

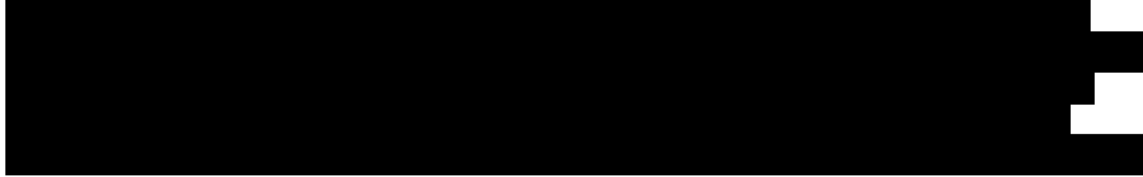
FW: Strengthening Heritage Protections in Brant County

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To: Spencer Pluck <spencer.pluck@brant.ca>

Hello Christine, John, and Steve,



We are concerned with the lack of heritage protections in place in the County, and in Paris in particular. Within the last few years, we've seen more and more demolitions of buildings of significance take place in Paris unopposed or with very few concessions or compromises. Since we have lived in town, which has only been a few years, we've seen several high profile buildings come down. We would love to live in a community with a strong creative vision for adaptive reuse and strong planning tools in place to protect heritage.

As you know, over Easter weekend, we saw the demolition of the Walker Press Building at 3-7 Yeo Street, particularly the unique Second Empire corner block known as the Maxwell Wing (1882). This buff brick building had beautifully decorated window hood moulds and a rarely seen bullnose corner on its mansard roof. As a corner building abutting the lot line, it would have made an excellent candidate for adaptive reuse; retention would need only focus on its exterior envelope. Even those who don't often give heritage much thought have commented on how much of a shame it is to see such a beautiful building sent to the landfill. The building was on a highly visible stretch of Willow Street in an area of Paris that is underrepresented by heritage buildings of this stature. Instead, we understand that there are no active development applications in place for the property (this may have since changed) and so, for the time being, Paris is left with both the loss of a heritage building and an empty site. This is one case where it would have been an easy win to keep the historic exterior and introduce density around and behind. A few weeks prior, the County also supported the demolition of another heritage building at 191 Pinehurst Road (Ames House). And, just a few months before that, a noticeable part of the commercial main street was cut out at 5-9 Grand River Street North. I understand that 719 Watts Pond Road may be soon to follow.

We've noticed that the County of Brant does not make use of many of the common tools that other municipalities have in place to enable heritage protection. For example, we understand that:

- The County does not have demolition control
- The County does not have a heritage grant program
- The County does not have dedicated heritage planning staff
- The County does not have any listed heritage properties
- The County does not have any heritage conservation districts and
- The County only has [30 individually designated properties](#); of which only 14 are in Paris.

We do not want these concerns to reflect poorly on staff in any way. In our limited experience with staff in Brant County, they have been friendly and are excellent at what they

do. Instead, we believe that these issues stem from outdated processes and a lack of tools available for staff to use.

For example, in Brant County, it appears that the Heritage Committee is operating by using outdated evaluation criteria. The Committee is using a 100-point scoring table to assess heritage value, an approach on a rating system that was last broadly used in Ontario in the 1990s. Instead, a values-based approach is more commonly used by municipalities today, in line with federal standards and guidelines and outlined in Ontario Regulation 9/06. A property either meets two or more criteria under the regulation, and can be considered for designation, or it meets less than two and cannot. Brant County's system also seems to rely exclusively on the Heritage Committee to conduct their own in-house volunteer evaluations and those recommendations appear to simply become staff's position to Council. [Section 4.43 of the Zoning By-law](#) enables "All proposals for new development within Heritage Areas will be commented on by the County's Municipal Heritage Committee who will advise Council of their position and comments", however there doesn't appear to be a mechanism in place to require outside heritage impact assessments. Heritage committees are volunteer organizations and very different from outside heritage professionals. The Heritage Act only requires that heritage committees be consulted on heritage matters, to advise and assist, they are not enabled to make binding decisions.

In the case of the Walker Press' Maxwell Wing, the Committee considered the property to merit getting "50+ Points", which, according to the County's own rating system, should be a trigger for designation, but the Committee still ended up supporting demolition. For 191 Pinehurst Road, the well-maintained Italianate home, the Committee conducted their own preliminary assessment instead of relying on heritage professionals or structural engineers. Instead, the Committee opted to support the demolition from the outset with only a few salvaged bricks as consolation. Normally, municipalities ask for heritage impact assessments upfront as standard requirements. This home had a number of notable heritage features including paired round-headed windows, decorative brackets, and a large pedimented frontispiece. Before the demolition, it was the last heritage building of this quality in the north part of town.

Another example of missing tools in Brant are listed properties on the heritage register. All municipalities in Ontario are enabled to have a heritage register, and most do. The register contains both designated properties and "listed" properties. Listed properties have some demolition protections which provide municipalities with the time to consider retaining properties either through designation or negotiations with property owners before they are taken down. In Brant, we understand that there are no listed properties, meaning that hundreds of properties that would normally have some demolition protection have none. Although Bill 23 will soon make the protections of listed properties temporary (2027), this is still quite unusual in Ontario, especially for a municipality with as many heritage resources as Brant in places like Paris, St. George, and Glen Morris.

Brant also lacks any heritage conservation districts and only has 30 designated properties in total. Compare that to other small communities known for their heritage character like **Niagara-on-the-Lake** and **Stratford** which have **231** and **89** individually designated properties respectively. Both of these municipalities, along with hundreds of other municipalities across Ontario, also have both heritage conservation districts and listed properties of their own.

In our view, heritage properties need to be better protected in Brant County. Standardizing heritage planning practices with other municipalities and following best practices is a great place to start. In a positive direction, we did see that ERA Architects has recently authored a new [Arts, Culture, and Heritage Strategy](#) which is a great first step forward for the County. Among the recommendations in the new Strategy is a call to designate more properties, begin to ask for heritage impact assessments, carve out a heritage planning role in Brant, and look to designate at least one heritage conservation district.

For any other run-of-the-mill community, cultural heritage isn't as important to identity and economy. But for Brant County, and Paris in particular, heritage really is the *defining characteristic* of the town. It's why people come here, and why others want to film. Hundreds of thousands of tourists and new residents choose Paris every year precisely because of its heritage character. Our encouragement to you, as residents and folks with some experience in this vein, is to strengthen heritage protections in Brant, and aim to maintain more of its unique character.

Thank you for your time,

