



### **Heritage Ottawa to CCCA Public Consultation 23 April 2013**

From a heritage perspective, our concerns are two.

#### **1. Protection of Class 1 & 2 Heritage Buildings**

We are all agreed that the HCD needs to be re-evaluated to bring it in line with current legislation, policies and practices. We agree that until the HCD study is completed and implemented existing protections should remain in force.

The wording that focuses value on Category 1 and 2 buildings in the CDP and Secondary Plan has been a concern of ours since the CDP was first mooted. The review of the categories should leave open the possibility that Categories 3 and 4 might be upgraded. Currently the wording focuses on re-examining categories 3 and 4 to see if they can be redeveloped. This Council has a track record for defending category 3 buildings, and I fear this wording will only lead us down the road to yet more battles to protect Category 3 contributing resources.

#### **2. Clusters.**

While it is true that a revised HCD will probably focus on areas of concentrated heritage value, one fears that the cluster concept might in fact lead to a scoping down of down the HCD, so that ultimately it has no defensible coherence, or indeed gets broken up into smaller bits. It will be hard to argue for buildings outside these privileged clusters.

On one hand, we can appreciate that if clusters are the way to go, then their geographic location and extent should be identified - otherwise, what are we defending? But the proposed amendment to identify NOW where those clusters are by reinstating a previous schedule is premature and will tend to exacerbate this process. Surely the review of the HCD will result in not only upgraded categories, but a better understanding of where these heritage clusters should be. While the text says reassuring things about heritage protection outside these clusters, the fact that greater height limits are already being proposed for outside these designated clusters is not reassuring.

It is worth considering whether, upon re-evaluation, one simply decides to consider buildings as either contributing resources or non-contributing resources, and save us all the hair-splitting.