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SENT BY MAIL AND E-MAIL

May 21, 2010

Kent Kirkpatrick
City Manager
City of Ottawa
110 Laurier Avenue West
Ottawa, Ontario K1P 1J1

**Re: Aberdeen Pavilion, 1 Lansdowne Park, Ottawa
Ontario Heritage Trust – Conservation Easement Agreement
Preliminary Comments to the Redevelopment of Lansdowne Park**

Dear Mr. Kirkpatrick,

I am writing in regards to Aberdeen Pavilion and the proposed redevelopment of Lansdowne Park in Ottawa. As you are aware, Aberdeen Pavilion, located within the Lansdowne Park lands is protected by a heritage conservation easement agreement held by the Ontario Heritage Trust (Registered April 22, 1996 as Instrument No. N739845). As such, the Trust has a direct real property interest in the site and is a legal stakeholder in decisions that affect the property. All alterations, construction of new buildings and structures, landscape designs and plantings, as well as excavations affecting the "Heritage Elements" and the "Property" including the Aberdeen Pavilion and protected viewscales, as defined in the agreement, must be approved by the Trust prior to being undertaken.

As the province's lead heritage agency, the Trust has a statutory mandate to preserve Ontario's cultural and natural heritage. One means by which this is accomplished is through heritage conservation easements, such as the one at Lansdowne Park. An important tenet of all conservation easement agreements is the conservation of the "Heritage Elements" and the long term stewardship of the property. Alterations of protected elements are permitted only when the proposed work furthers the conservation of the cultural heritage resources. The owner is required under section 1.1 of the agreement to submit alterations and activity requests in writing and to subsequently obtain the written approval of the Trust in advance of the work. To date no written requests have been submitted to the Trust, nor has the Trust issued any written approvals or comments related to the Lansdowne project.

On Friday August 28th 2009 Trust staff met with City staff at Lansdowne and discussed the preliminary plans for the Lansdowne redevelopment. The meeting was introductory. No

drawings were submitted and no approvals were sought. During the consultation Trust staff expressed a number of significant concerns with the proposal including the proposed relocation / demolition of the Horticultural Building, the scale and block plan of the proposed new development, the potential encroachment into the easements lands, and the general lack of heritage expertise and vision.

The Trust did not receive any further consultation with the City until late April of this year. On Friday April 30, 2010 Trust staff met with representatives of the City of Ottawa and its consultants to receive a project briefing and discuss the proposed redevelopment of Lansdowne Park. This included a high-level overview of the public park competition and the Ottawa Sports and Entertainment Group plan for the stadium and commercial / residential development. Again, no drawings were submitted and no approvals have been sought under the agreement.

In the period between these two meetings the Trust was not consulted regarding the development of the competition, the urban design or new plans. As a legal stakeholder and provincial approval agency for a large portion of the site the Trust needs to be closely involved in the design review and project team selection in order to ensure that the resulting designs are consistent with the easement agreement, and meet a high standard of architectural, landscape and urban conservation. We do acknowledge that the five designs for the Lansdowne Park redevelopment have now been posted on the City's website for public comment.

The Trust adheres to the Standards described in Parks Canada's *Standards and Guidelines for the Conservation of Historic Places in Canada* and uses these in its review of alteration requests for its easement properties. The *Standards and Guidelines* defines Conservation as:

All actions or processes that are aimed at safeguarding the *character-defining elements* of a cultural resource so as to retain its *heritage value* and extend its physical life. This may involve "preservation", "Rehabilitation," "Restoration," or a combination of these actions or processes.

The proposed redevelopment project involves a number of cultural heritage resources including: the Aberdeen Pavilion, Horticultural Building, Rideau Canal and the general character of the adjacent commercial neighbourhood of Bank Street and residential neighbourhood of the Glebe. The City's Lansdowne Park plans as outlined to the Trust and in the documentation available on the City of Ottawa website do not adequately address conservation as described above – especially as this relates to the proposal to partially demolish and partially relocate the façade of the Horticulture building (designated under the *Ontario Heritage Act*) and the scale of some of the new development in the north west quadrant of the Park.

In response to the preliminary overview provided by the City, the Trust requests that the City address the following items and incorporate them into the design and planning process:

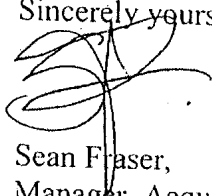
1. As an important legal stakeholder the Trust should have an active role in the design review process and should be represented on the design review panel (i.e. jury) as are our peers at Parks Canada and the National Capital Commission.
2. The overall project should be developed with direct reference to and using the technical vocabulary of the Parks Canada *Standards and Guidelines for the Conservation of Historic Places in Canada*.
3. The Horticultural Building, a rare and important designated heritage property is integral to the heritage value of the site and any proposals should incorporate this structure into the design *in situ* and *in toto*.
4. To ensure it meets *Planning Act* requirements the preliminary development proposal needs to be reviewed with attention to the Provincial Policy Statement (PPS 2.6.1, 2.6.2 and 2.6.3) which includes the *conservation* of significant built heritage resources, cultural landscapes, archaeology and the impacts on adjacent protected heritage resources.
5. Comparative heritage impact assessments should be prepared for all 5 submissions for the park lands as well as the Ottawa Sports and Entertainment Group design and those assessments should be part of the review criteria.
6. The Lansdowne Park Transformation Plan and the Heritage Brief as well as the RFP should contain consistent language and definitions particularly in reference to heritage (see memo attached).
7. The City is requested to complete in writing an OHT alteration approval request including any accompanying documentation (e.g. plans, specifications, Heritage Impact Assessments, Conservation Plans etc.) that fully describes the scope and method of the work proposed at the site and in those areas protected by the easement.

The Trust cannot support the current approach to the redevelopment and sees some fundamental flaws in process, competition parameters, preliminary designs and heritage review. The partial demolition and relocation of the Horticultural building is contrary to the Trust's mandate, the easement agreement, the *Ontario Heritage Act*, the Provincial Policy Statement of the *Planning Act* and can not be considered as heritage conservation. The Trust requests the City to re-consider their design selection and review process in order to address the heritage concerns at Lansdowne Park and on the easement lands until such time as stakeholders, including the Trust are satisfied that the design will be to the benefit of the heritage resources associated with these lands. In order to secure the long term protection of the Horticultural building (*in situ* and *in toto*) the Trust will be seeking a conservation easement agreement on this building.

Trust staff have additional and more detailed comments, which we have attached to this letter a memo for your consideration. We welcome the opportunity to meet with your team as you refine the transformation and enhancement of this important site. Lansdowne is recognized as significant to all levels of government and internationally through the Rideau Canal UNESCO World Heritage Status. As a result the plans for its renewal should involve the participation of all of these stakeholders.

Should you have any concerns or questions with regard to the conservation easement agreement or the comments listed within this letter, please contact me by telephone at 416-325-5019 or via e-mail at sean.fraser@heritagetrust.on.ca.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'Sean Fraser', written over a vertical line that extends downwards.

Sean Fraser,
Manager, Acquisitions and Conservation Services

Copy: John Smit, Manager, Development and Planning , City of Ottawa (E-mail Only)
John Stewart, Commonwealth Historic Resource Management Limited (E-mail only)
Jay Baltz, Chair, Ottawa Municipal Heritage Committee (E-mail Only)
Pam Buell, Parks Canada Limited (E-mail Only)
Linda Dicaire, National Capital Commission (E-mail Only)