



Save Heritage Sandbanks Homes

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Copied to:

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Dear Mr Finnerty, Mr Imbrogno and Ms Stuart,

Re: In light of new information arising, urgent request to review the application of the provincial *Standards & Guidelines* to Hyatt and MacDonald Houses at Sandbanks Provincial Parks for compliance

Our group, Save Heritage Sandbanks Homes (SHSH), is writing to you because of your responsibility for monitoring and reviewing the effectiveness of the *Standards & Guidelines for Conservation of Provincial Heritage Properties* and compliance with them (Deputy Minister, MHSTCI); and your responsibility to ensure that staff responsible for making decisions and undertaking activities that may affect provincial heritage properties are aware of and adhere to the *Standards & Guidelines* (Deputy Minister MECP and Executive Lead for Ontario Parks).

We understand that for some time the Architectural Conservancy of Ontario has been generally concerned about adherence to the *Standards & Guidelines*; therefore, we have copied Kae Elgie, ACO President on this letter. Ms Elgie is aware of the imminent threat of demolition of the Hyatt and MacDonald Houses in Sandbanks Provincial Park as early as September 1, 2021, and she has written a letter to Minister Piccini about ACO's concerns.

For those officials who are coming fresh to the matter of these culturally significant heritage buildings (both of which meet the criteria of O.Reg. 9/06 of the Ontario Heritage Act), please see our video *Saving Heritage Sandbanks Homes*, which is an easily digestible primer about the houses and an expression of our community's commitment to adaptive re-use of heritage buildings. Indeed, we believe that our community is an example of the entrepreneurial and

creative spirit that drives the conservation of Ontario's built heritage and cultural heritage landscapes. We believe further that the future survival of this heritage legacy lies in close cooperation and respect between government and the community. The video can be viewed at:

<https://saveheritagesandbankshomes.com/video>

or

<https://www.youtube.com/watch?v=gbq114nzxjA>

or

home page of countylive.ca (top right)

In this letter, SHSH is bringing to your attention new information that was not available at the time that MHSTCI provided its input to Ontario Parks. The new information triggers a **fresh and urgent reconsideration** of two requirements of the *Standards & Guidelines*: E2, demolition as the last resort, requiring Ontario Parks to “apply best efforts to arrange for an alternate use of the property”; and F3, “granting leases, licences, rights, or operating agreements” as recognized alternatives to demolition.” Significantly, nowhere do the *Standards & Guidelines* limit or prescribe adherence to a particular point in a particular administrative process. Rather, best efforts are required, following the (very first) principle of “accountability and transparency ... taking into account the views of interested persons and communities” (p 4).

The new circumstance is Ontario Parks' May 28, 2021 announcement of a program to seek innovative proposals from the private and not-for-profit sectors to enhance visitor experiences, funded by a \$6M investment: <https://news.ontario.ca/en/backgrounder/1000218/ontario-investing-in-enhancements-and-upgrades-to-provincial-parks> We are told that the details of the new program have not yet been worked out, but as we noted to Minister Piccini in our call with him on August 17, a program that sees Ontario Parks entering into partnership with the private and not-for-profit sectors is tailor-made for Prince Edward County and the Sandbanks heritage houses.

The key points arising from this new circumstance are:

- The Hyatt and MacDonald Houses are still standing.
- The new program offers an alternative to demolition (F3).
- Ontario Parks is required to apply best efforts to arrange for this alternate use (E2), especially as this is the expressed wish of the community (first principle).

In our view, Ontario Parks can, and should be required to, pursue this approach now, to be in compliance with the *Standards & Guidelines*.

Ontario Parks' original stated reason for demolition was that “the resources do not exist to undertake further studies or to rehabilitate and maintain the structure” (final Heritage Impact Assessments for both houses, p iii). Although this was never an acceptable reason for demolition as a last resort, the reason is now moot, given the new program.

We must also mention that MECP recently stated publicly that Ontario Parks' cultural heritage consultant recommended tearing down the buildings for health & safety reasons as they are “no longer safe to maintain or access” (CKWS Global Kingston News, 27 August 2021). This advice from a cultural heritage consultant who is unqualified to comment on such technical matters is contradicted by the highly qualified heritage architects Edwin Rowse and Philip Evans of the pre-eminent Toronto firm ERA Architects. As per *Standards & Guidelines* (D4), when changes are proposed to meet health & safety requirements and the changes adversely affect a property's

cultural heritage value, advice must be obtained from a qualified person on compliance alternatives. In the case of the Hyatt and MacDonald Houses, the qualified person would be an engineer or architect.

Demolition of the Hyatt and MacDonald Houses could happen as early as September 1. In light of Ontario Parks' new program, **SHSH requests your urgent review** of the application of the provincial *Standards & Guidelines* to these heritage houses, to ensure compliance and to ensure that the relevant staff are aware of and adhere to the *Standards & Guidelines*. We trust that MHSTCI and MECP will work closely together on this review.

In our view, compliance requires Ontario Parks to take decisive steps now to seek proposals for adaptive reuse of the Hyatt and MacDonald Houses.

Sincerely,

Liz Driver on behalf of:

Lead Team for Save Heritage Sandbanks Homes

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