



Ontario Association of Architects

The Honourable Michael Tibollo
Minister of Tourism, Culture and Sport
900 Bay Street
Toronto, ON
M7A 2A1

[sent via e-mail]

December 12, 2018

Dear Minister:

Please accept the following submission about the importance of architecture to the province's tourism industry. As a self-regulating body, the Ontario Association of Architects (OAA) is dedicated to promoting and increasing the knowledge, skill and proficiency of its members, and to administering the *Architects Act*, in order that the public interest may be served and protected. We remain committed partners with the Government to realize the best possible outcomes for the province, and people, of Ontario.

Architecture is culture in and of itself. It both creates culture, and reflects culture as a built expression of a moment or period in time. The last study of the travel activities and motivations of Canadian residents showed that more than 57 per cent of visiting tourists plan their activities to include viewing the buildings, historic sites and architecture of their destination. Ontario's cities can stand out as world class on the world stage, but only if we nurture our existing built form and create conditions that support exciting new projects.

Architectural Tourism (“architourism”) and Architectural Recognition

A 2018 report prepared for the OAA by the Altus Economic Group entitled “Contribution of the Architectural Services to Ontario’s Economy” found that the single largest motivator to visit Ontario among tourists is a desire to visit historic sites and see architecture. The study also found that tourists who were motivated by historic sites and architecture spent \$1.9 billion in 2010, helping to support thousands of jobs and contributing over a billion dollars to Ontario’s GDP.

In 2007, Ontario’s Ministry of Tourism released a study on travel activities and motivations. It found that 39% of visitors cited “strolling around a city to observe its buildings and architecture” as an activity during overnight trips and was tied as the most common reason for planning trips. The majority of the remaining motivations (e.g. aquariums, art galleries, museums, etc.) occurred within buildings that are designed by architects.

A 2012 report from the Ontario Arts Council echoed this point, finding that “seeing historic sites and/or strolling through cities to see architecture is the largest arts and culture trip driver”. In this report, 61% of North American tourists cited “Historic Sites, Buildings, Architecture” as one of the main tourist activities and 32% (again, the largest percentage of all activities listed) specifically cited it as a trip driver.

According to this report from the Ontario Arts Council, arts and culture tourists “contributed \$3.7 billion towards the province’s gross domestic product (GDP).” Given that architecture is the largest motivating factor behind tourist visits, and that most of the other tourist activities occur within the

province's architecture, the underlying significance of architecture to the tourism sector cannot be understated. The government should take steps to ensure that architecture is nurtured and able to flourish.

Architecture Policy

The OAA would like to make the Government aware that conversations continue around the establishment of a national (and provincial) architecture policy. A public architecture policy can help to raise awareness about the importance of the built environment, promoting design excellence while also addressing other key issues such as economic growth, sustainable development, and housing affordability. A national architecture policy can also help to facilitate the design and construction of architecturally significant buildings that draw tourism to the province and help drive economic development. National architecture policies are in place in a majority of European countries and play an important role in shaping the built environment. As this national conversation continues, we hope that Ontario will actively support an architecture policy, both nationally and provincially.

Architectural Recognition

Toronto City Council enacted a policy in 2006 which required architectural recognition signs/plaques to be prominently displayed on all new buildings with a floor space of 1,000 square metres or more. To support his motion, former Minister Peter Milczyn (then Chair of the City's Planning & Growth Management Committee) wrote:

"The popularity of events like Doors Open, of Heritage Walks, and various architectural and urban publications highlights the public's interest in who is building the city. Globally, architectural tourism is an important element of tourists' interest in the history and culture of the places they visit. By requiring that all new buildings be required to display the name of the Architect of Record or primary Design Architect, an ongoing record of the history and development of the City of Toronto can be created. This will also serve to engage the public more in the debate about architecture, design, and creativity that is growing in Toronto." The OAA recommends that the Province of Ontario enact a similar policy especially considering the growing popularity of architourism activities like Doors Open events and Heritage Walks across Ontario municipalities.

Statute: Ontario Heritage Act

Buildings are routinely demolished across the province and the OAA recognizes that not all can or should be saved. With this said, Ontario must give greater consideration to protecting the province's unique architecture before it is gone. Over the past year, the OAA has engaged in a number of conversations regarding saving important historic buildings across the province. In these instances, the OAA unilaterally pushed for adaptive reuse as the preferred option for saving historic buildings slated for demolition.

Another area of concern relates to what is referred to as "demolition by neglect" and post-disaster response, both of which tend to have the same outcome: a building is condemned and is demolished. Some examples of this have been seen in communities around Ontario such as Goderich, Hamilton, Kitchener and Ottawa. Architects with demonstrable experience in heritage preservation contested that various buildings could (and should) have been saved following a natural disaster or situations where the owner neglected to maintain the building. Ultimately though, buildings were still demolished and the historic fabric of communities altered. In the United States, the Federal Emergency Management Agency (FEMA) has made it a practice to integrate architects onto their post-disaster response teams. These architects bring unique insights and expertise to assessing compromised structures and the need or value in preserving them.

The deciding factor to demolish a structure generally appears to be a lack of political will and a lack of appreciation for the architectural and cultural significance of these structures in our communities. Our first response should not always be to condemn buildings that have been

compromised. Not prioritizing our built heritage may compromise tourism opportunities, good-paying jobs and economic development. Ontario must better incorporate architects into decision-making processes around saving or demolishing historically significant buildings and the OAA recommends making changes to the *Ontario Heritage Act* to reflect this. In doing so, Ontario has the opportunity to protect our built and environmental heritage, save and create jobs and help to grow the economy.

Infrastructure for Jobs and Prosperity Act

In June 2015, the *Infrastructure for Jobs and Prosperity Act* received Royal Assent bringing with it the requirement for Ontario to “incorporate design excellence into infrastructure planning.” Subject to the enactment of regulations, the legislation requires that an architect “be involved in the preparation of the design for the construction of every infrastructure asset...unless it is not practicable in the circumstances.” With this legislation, the government ultimately committed to constructing better buildings both in terms of functionality and design, as well as the legacies the buildings will leave behind within their communities. The CN Tower is a prime example of how an important piece of infrastructure has become one of Ontario’s, and Canada’s, most recognizable and popular tourist attractions.

Nearly three years later, the OAA continues to push for the government to develop the regulations that are required to enact this critical part of the legislation. Be it for the sake of tourism, design excellence, adding value, lowering operating costs, or contributing to our economic growth, these regulations should have long been developed and put into place. Committing to the introduction of these regulations would align well with the Government’s election platform to increase local infrastructure funding. Having well-designed public infrastructure can save money, create jobs and help improve the provincial economy. Furthermore, the money saved can be re-invested into other areas of the economy or areas in need of increased investment. In light of the points noted above, every project undertaken by the government without this increased involvement of architecture and a commitment to design excellence is a lost opportunity for the province. We stress that these regulations must be written and enacted as quickly as possible.

The OAA hopes to partner with the Government to reduce regulatory burden, to enhance architecture and architourism, insure our infrastructure is safe and suitable for the people, and ultimately to ensure that Ontario is open for business. Thank you for your time and consideration of this submission and please do not hesitate to contact us moving forward, as we remain a ready and willing resource for you and your Ministry.

Sincerely,



John K. Stephenson, Architect
OAA, FRAIC
President

