

**THE CORPORATION OF THE TOWN OF GEORGINA**

**REPORT NO. DS-2024-0057**

**FOR THE CONSIDERATION OF  
COUNCIL**

**October 9, 2024**

**SUBJECT: MUNICIPAL HERITAGE REGISTER REVIEW – DRAFT CULTURAL HERITAGE EVALUATION REPORT AND PRELIMINARY ASSESSMENT OF LISTED PROPERTIES (TOWN FILE: 05.269)**

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**1. RECOMMENDATIONS:**

- 1. That Council receive Report No. DS-2024-0057 prepared by the Planning Policy Division, Development Services Department, dated October 9, 2024, respecting the Municipal Heritage Register Review – Draft Cultural Heritage Evaluation Report and Preliminary Assessment of Listed Properties; and,**
- 2. That staff report back to Council no later than Q2 of 2025 following the receipt and assessment of all Council and public comments, with recommendations on the designation of Listed properties that incorporate considerations in addition to the minimum criteria established in the Ontario Heritage Act.**

**2. PURPOSE:**

The purpose of this report is to present a draft Cultural Heritage Evaluation Report (CHER) and preliminary assessment of all Listed properties on the Town's Heritage Register, in addition to comments received from the public to date as part of the Municipal Heritage Register Review project.

**3. BACKGROUND:**

On September 27, 2023, Council considered [Report No. DS-2023-0074](#) which addressed changes to the *Ontario Heritage Act* resulting from Bill 23 (The More Homes Built Faster Act) and their implications on the Town's Heritage Register. The report noted that given the implications of Bill 23, including the extensive amount of background research that is required to review existing Listed properties, the need for defensible recommendations to Council on which properties are worthy of Designation, the rights of landowners to object to heritage Designations and/or appeal decisions to the Ontario Land Tribunal (OLT), and the tight timeframe to complete this work, it was recommended that a heritage consultant be retained to complete the necessary work. At that meeting, Council adopted [Resolution No. C-2023-0335](#) which in part approved a budget of \$100,000 for a heritage consultant to complete the review

of the Heritage Register, including seven (7) additional properties which were recommended to be included on the Register by the previous Georgina Heritage Advisory Committee, and to report back to Council with the results of the review on any properties worthy of designation under the *Ontario Heritage Act* to facilitate any designation process as directed by Council prior to January 1, 2025.

Following Council's approval of the budget, staff undertook a procurement process to retain a consultant, and awarded the contract to the successful firm, Giaino + Associates Architects Inc. (the "consultant"), a consulting firm specializing in architecture and heritage preservation. This procurement was conducted on the basis that the Heritage Register Review would need to be completed by January 1, 2025. However, since Bill 23 was passed, the Province has extended the deadline to complete this work to January 1, 2027.

The project start-up with the consultant was commenced in Q1 2024. This included the implementation of a communication strategy and outreach to the owners of all Listed properties to inform of the study process and in some instances to request permission to enter on property where sites were not readily visible from the street. The consultants undertook field investigation site visits, review of archival records, published sources and municipal / provincial records. This included assistance of the team at the Georgina Pioneer Village and Archives and the Georgina Public Library and access to relevant records and materials.

On [May 8, 2024](#), Council considered a Briefing Note which provided a project update and overview of the proposed work program, and passed Resolution No. C-2024-0156 as follows: *"That staff be directed to put forward an Ad Hoc Working Group to assist the Heritage Consultant firm in updating the Municipal Heritage Register Review project, that this ad hoc working group be built into the consultant's work plan with details on promoting the working group to be part of communications, that once the project is completed in January of 2025, that staff commence the process to establish Heritage Committee for the remainder of the 2022-2026 Term of Office and that an honorarium be considered for Committee Members, once established."*

Based on the Council direction the Ad-Hoc Heritage Working Group (Working Group) was established. The Working Group has met with staff and the consultant on two occasions and provided valuable background information and advice to assist in the completion of the project.

A further Briefing Note was prepared and received by Council on [August 14, 2024](#). The Briefing Note provided a further update on the progress of the project. This included outlining the next steps and the public open house process with property owners and interested parties that was scheduled for the week of September 9, 2024. In addition, the schedule for the remainder of the study process was provided including the timing of the October 9, 2024 staff report on the draft CHER and the consultant's

preliminary findings on the applicability of the statutory criteria for designation to the Listed properties.

The Briefing Note further outlined the target date for the report to Council on recommendations for Designation (November 20, 2024) and the schedule for the remainder of the process. Further details are provided in the subject briefing notes and in Sections 4 and 5 below.

#### **4. PUBLIC CONSULTATION AND NOTICE REQUIREMENTS:**

##### **4.1 PUBLIC COMMENTS**

As of the completion of this report, staff have received 18 written submissions from the public. These submissions are provided for Council's review as Attachment 1, Pages 1 through 23. Of the 18 written submissions received, 17 are from landowners of Listed properties. One landowner also owns two Listed properties.

The location of all Listed properties for which comments have been received and the position taken by the landowner(s) are shown on Attachment 2 (18 total properties). These submissions have been colour coded based on the landowner's position on their property potentially being Designated. Red indicates the owner is opposed to the Designation of their property; green indicates the owner is in favour of the Designation of their property; and, yellow indicates that the owner has provided no position on Designation to date.

Based on discussions with landowners of Listed properties, it is expected that more submissions will be received following the public release of this report.

##### **4.2 PUBLIC CONSULTATION AND NOTICE**

During the weeks of September 9<sup>th</sup> and 16<sup>th</sup>, 2024, staff hosted a Public Open House. The Open House was in the form of one-on-one virtual and in-person meetings between staff and residents. The meetings included a brief presentation by staff followed by an opportunity for residents to ask questions and discuss the project. Notice of the Open House was mailed to all Listed property owners, posted on the Town's website and in several Town facilities, and advertised on the Town's social media accounts. In total there were 20 meetings held; 18 of which were with landowners of Listed properties.

Based on the discussions with landowners of Listed properties at the Public Open House sessions, staff received the following positions respecting the potential Designation of their properties:

- 0 indicated support for their property being Designated;

- 10 indicated objection to their property being Designated; and,
- 8 provided no position on Designation. Many of these landowners suggested that they would wait to read the CHER and the consultant's recommendations regarding their property before providing a position.

It should be noted that although the above positions were received from landowners of Listed properties at the Open House, staff requested that landowners follow up and provide written submissions to confirm their position for the public record.

There are no statutory notice requirements that apply to this report. Despite this, notice of this report was sent by regular mail to all assessed landowners of Listed properties and by email to all Interested Parties on record on September 19, 2024. The dedicated project webpage was also updated to provide notice of the report.

## **5. ANALYSIS:**

### **5.1 ONTARIO REGULATION 9/06: CRITERIA FOR DETERMINING CULTURAL HERITAGE VALUE OR INTEREST**

O. Reg. 9/06 under the *Ontario Heritage Act* establishes nine (9) criteria for Designation as follows:

1. The property has design value or physical value because it is a rare, unique, representative or early example of a style, type, expression, material or construction method.
2. The property has design value or physical value because it displays a high degree of craftsmanship or artistic merit.
3. The property has design value or physical value because it demonstrates a high degree of technical or scientific achievement.
4. The property has historical value or associative value because it has direct associations with a theme, event, belief, person, activity, organization or institution that is significant to a community.
5. The property has historical value or associative value because it yields, or has the potential to yield, information that contributes to an understanding of a community or culture.
6. The property has historical value or associative value because it demonstrates or reflects the work or ideas of an architect, artist, builder, designer or theorist who is significant to a community.
7. The property has contextual value because it is important in defining, maintaining or supporting the character of an area.
8. The property has contextual value because it is physically, functionally, visually or historically linked to its surroundings.
9. The property has contextual value because it is a landmark.

In order for a property to potentially be Designated, it must meet a minimum of two (2) of the nine (9) criteria.

The nine (9) criteria for Designation are expressed broadly as they would apply Province wide. There is a degree of subjectivity to some of the criteria and they are generally informed by local values and community context.

In accordance with Part IV, Section 29(1) of the Act, “*the council of a municipality may, by by-law, designate a property within the municipality to be of cultural heritage value or interest...*”. In this regard, there is no obligation imposed on Council to designate all properties meeting the criteria within the municipality; it is solely at Council’s discretion.

The current direction in the Act as introduced by Bill 23 has forced municipalities to become more proactive in their respective heritage conservation programs by, in effect, forcing the determination of the merits for Designation of currently Listed properties in a relatively short period of time. This significantly changes established practice and forces critical decision-making respecting potential Designation on all Listed properties contained in a municipal heritage register by January 1, 2027, or alternatively, the Listed properties will be removed from the Register in accordance with the Act and will not be eligible to be put back onto the Register for a period of five (5) years. Properties that are not Listed or Designated have no protection against the demolition of buildings or structures.

## 5.2 PLANS AND POLICIES RELATED TO HERITAGE CONSERVATION

In order to inform the heritage Designation process, staff have conducted a review of the Town’s applicable policy documents to better understand the Town’s stated values, direction and vision with respect to heritage conservation. Staff have also reviewed the new Provincial Planning Statement, 2024 (PPS) that comes into effect on October 20, 2024.

### 5.2.1 Town of Georgina Official Plan and Secondary Plans

#### Official Plan, 2016

There are two references to cultural heritage resources in the Official Plan’s Guiding Principles and Objectives in Section 2.2.

Policy 2.2.2.9 under Sustainability Objectives states it is an objective of the Town “to conserve, protect, and enhance the Town’s cultural heritage resources and promote cultural expression in the Town.”

Policy 2.2.12.6 under Healthy and Complete Communities Objectives states it is an objective of the Town “to recognize, conserve and promote cultural heritage resources and to perpetuate their value and benefit to the community as outlined in the Town’s Municipal Cultural Plan.”

Section 8.8 of the Official Plan addresses Cultural Heritage and Archaeological Resources (refer to Attachment 3). Cultural heritage resources include archaeological resources, built heritage resources and cultural heritage landscapes. The combination of human-made buildings and structures as well as the natural landscape create an area that is valued by the community. The policies in this section support the identification, restoration, protection and maintenance of cultural heritage and archaeological resources through the development approvals process. There are also enabling policies that establish the ground rules and requirements for the consideration of the creation of heritage conservation districts.

#### The Keswick Secondary Plan, 2023

Section 13.1.4.3.2(k) of the new Keswick Secondary Plan defers to the Official Plan for policies related to Cultural Heritage and Archaeological Resource Conservation. As such, there is no additional direction or criteria provided respecting the potential Designation of cultural heritage resources.

#### Sutton/Jackson’s Point Secondary Plan, 2013

Section 13.2.3.3 of the Sutton/Jackson’s Point Secondary Plan contains policies for Heritage Conservation and Archaeological Preservation. Similar to the Official Plan, this section supports the identification, restoration, protection and maintenance of cultural heritage and archaeological resources through the development approvals process, but does not provide additional direction or criteria as it relates to identifying which cultural heritage resources are unique to the community and require protection through Designation, either as part of a development approval process or otherwise.

#### Pefferlaw Secondary Plan, 1996

Section 13.3.6 of the Pefferlaw Secondary Plan contains enabling policies to conserve, protect and enhance heritage resources in the community, as well as policies that shall be considered through the processing of development applications. Again, there is no additional direction or criteria as it relates to the identification of cultural heritage resources requiring protection through Designation.

#### Analysis of Official Plan and Secondary Plans

The existing policies in the Town’s Official Plan and related Secondary Plans are basic enabling provisions for the establishment of a heritage planning program as permitted by the *Ontario Heritage Act*. These policies do not establish any specific direction

either in terms of thematic objectives of a heritage program nor any specific geographic context, historic themes, time-period or points of interest. Similarly, the policies do not provide any localized values, priorities or principles by which to consider the Designation of properties, cultural landscapes or heritage conservation districts beyond the minimum standards and requirements of the *Ontario Heritage Act*.

Further, the policies do not provide an expression of a vision or guiding direction as to cultural heritage resources or elements which are unique, representative of the community, or important to the history of the municipality to further guide the selection of sites which shall be protected through Designation.

This situation is not unusual in the municipal Ontario context. The Designation of properties under the Act is a significant undertaking by a municipality and can have profound impacts on the use and enjoyment of private property depending upon the nature of the restrictions and the perspective of the property owner. It is for this reason that many municipalities in Ontario have only Designated key properties and retain larger rosters of Listed properties for which the decision making on Designation is triggered by a specific event such as a planning application or building/demolition permit application.

#### 5.2.2 Municipal Cultural Plan, 2012

The goals of the Municipal Cultural Plan are:

- To identify the cultural resources in Georgina;
- To set these resources into the provincial, regional and local planning context;
- To identify goals and strategies for developing Georgina's cultural resources; and,
- To provide a framework for managing cultural development going forward.

Cultural heritage is one of the several disciplines that are discussed in the Municipal Cultural Plan. Cultural heritage includes natural heritage, built heritage, material heritage, and folkloric arts.

The Plan references an illustrated local history produced by residents of Georgina in 2010 entitled "The Georgina Book: What Citizens Value Most". The book describes Georgina as a "Community of Communities" whose unique character is derived from "lakefront communities and small rural hamlets interwoven between its three larger communities – Keswick, Sutton and Pefferlaw."

The Plan takes the position that Georgina's three larger communities of Keswick, Sutton/Jackson's Point and Pefferlaw, will continue to maintain their own cultural

identities within Georgina as distinct urban places with their own residential neighbourhoods clustered around a commercial/retail core.

### Analysis of Municipal Cultural Plan

While the Plan acknowledges the uniqueness of each of Georgina's communities, it does not provide any further detail as to what makes them unique from one another or provide any guidance or criteria to be considered for the preservation of cultural heritage resources through Designation.

### 5.2.3 Provincial Planning Statement, 2024 (PPS 2024)

On October 20, 2024, the new PPS 2024 will replace the PPS 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019.

Section 4.6.4 of the PPS 2024 provides that:

*"Planning authorities are encouraged to develop and implement:*

- a) Archaeological management plans for conserving archaeological resources; and,*
- b) Proactive strategies for conserving significant built heritage resources and cultural heritage landscapes."*

Planning authorities (i.e. Council) are encouraged, but not required, to develop and implement archaeological management plans and proactive strategies for conserving significant built heritage resources and cultural heritage landscapes.

### 5.3 JACKSON'S POINT MARINE RAILWAY

On August 11, 2021, Council considered a request from the previous Georgina Heritage Advisory Committee and passed Resolution No. C-2021-0253 to direct that the Jackson's Point Marine Railway be Designated a historical site. In order to carry out Council's direction, the consultant has assessed the Jackson's Point Marine Railway and provided the necessary information to proceed with Designation of the property.

Based on the consultant's analysis, the Jackson's Point Marine Railway is worthy of Designation under Part IV, Section 29 of the *Ontario Heritage Act* for its cultural heritage value, and meets O. Reg. 9/06, the provincial criteria prescribed for municipal Designation under the categories of design/physical, associative/historical and contextual value.

The remaining intact section of the Jackson's Point marine railway at the bottom of Lake Simcoe is a unique example of a marine railway from the 19<sup>th</sup> century Lake



Simcoe steam-shipping industry. The railway measures approximately 200 feet long by 24 feet wide, is constructed of interlocking logs and reflects the property's use by The Lake Simcoe Transportation and Dry Dock Company. Attachment 4 is a draft copy of Schedule A, Statement of Significance and Reasons for Designation, which will be appended to the future Notice of Intent to Designate and subsequent Designation By-law that will be brought to Council for passing.

#### 5.4 CONSIDERATION OF A HERITAGE CONSERVATION DISTRICT

At the September 27, 2023 Council Meeting, a member of Council requested that staff examine and determine whether the scope of work for this project as it relates to High Street in Sutton, could be more effectively conducted through a Heritage Conservation District (HCD) approach.

Staff note that from 2006 to 2009, the Town investigated the merits of establishing a HCD along High Street in Sutton. Although a Preliminary Evaluation concluded that High Street was a suitable candidate for protection as a Heritage Conservation District, the HCD process was never advanced or concluded due to, in part, the amount of strong opposition received from landowners and businesses at that time.

With respect to the latest request, the Town's consultant has indicated that the creation of a HCD within the scope of this project is not feasible or recommended due to the specific requirements contained within the *Ontario Heritage Act*, as amended by Bill 23. One of these requirements includes a threshold that requires a minimum of 25% of all properties within the proposed district to be worthy of Designation in order for the district to be established.

There is also an extensive process that is involved in establishing a HCD. This includes undertaking a HCD Study that would identify a proposed geographic boundary that would apply to the HCD and include a review, inventory and assessment of all buildings and structures within such boundary to determine if the area should be preserved as a HCD. The Study would also make recommendations on the objectives of the Designation, the content of a HCD Plan and identify any changes that will be required to the Town's Official Plan and any municipal by-laws, including zoning by-laws.

Following the conclusion of a HCD Study, a HCD Plan would need to be prepared which would establish objectives, a policy statement, guidelines and procedures for achieving the stated objectives, and identify heritage attributes and establish a description of alterations that are minor and could be carried out without obtaining a heritage permit from the municipality. There is also a considerable public engagement processes required to implement a HCD.

It is also important to recognize that even if a HCD for a specific geographic area such as High Street in Sutton was considered, it would not capture the majority of the

properties Listed on the Register. Therefore, there would be no efficiencies gained by undertaking a HCD as the bulk of the consultant's work would still have been required to assess the other properties Listed on the Register and not located on High Street.

#### 5.5 DRAFT CULTURAL HERITAGE EVALUATION REPORT (CHER)

The draft CHER, provided as Attachment 5, is a culmination of the technical background research and analysis undertaken by the Town's consultant. The draft report provides an evaluation of 128 properties (121 Listed properties as well as the additional seven (7) properties of interest directed by Council) against the nine (9) criteria for Designation as contained in O. Reg. 9/06 under the *Ontario Heritage Act* and provides a preliminary assessment with respect to Designation. The report is still in draft form as we continue to review and collect information on the subject properties. A final version of the CHER will be provided with final recommendations when staff return next to Council.

The draft CHER prioritizes the 128 properties under review into four (4) categories as follows:

- Priority 1 (50 properties): Highly significant properties, owners interested in designation, and those at risk.
- Priority 2 (27 properties): Properties with existing protections or those owned by the municipality, eligible for longer timelines for designation.
- Priority 3 (28 properties): Candidates for further research, meeting a single criterion.
- Delist (19 properties): Properties deemed too altered or damaged to warrant inclusion on the register.

A further three (3) properties have not yet been prioritized, as they were not able to be reviewed in person yet. While one (1) property is in the process of being Designated (Jackson's Point Marine Railway).

Summary of key findings of the CHER:

- Of the 128 properties being evaluated, 78 meet the minimum threshold for Designation.
- There are two (2) properties which meet the threshold for Designation, but which have previously been Designated and then de-listed by previous Councils.
- There is one (1) property that meets the threshold for Designation and was previously investigated for Designation, but Council did not proceed with Designation.
- There are six (6) properties which, due to major irreversible alterations or deteriorated conditions, have been preliminarily assessed to be removed from the Register.

- There are two (2) properties which were previously removed from the Register by Council, but were not taken off the Register administratively.

As noted above, regardless of a property meeting a minimum of two (2) of the criteria, Council is not obligated by any statutory requirements to designate each property.

## 5.6 IMPLICATIONS OF A HERITAGE DESIGNATION

There are a number of implications of the Heritage Designation process both from the perspective of the municipality and from that of a property owner.

The Ontario Heritage Trust identifies a number of benefits of designation under the *Ontario Heritage Act*, including:

- Designation of individual properties empowers a municipality with the legal ability and jurisdiction to determine if a heritage property will be preserved.
- Designation can be undertaken with or without the support or consent of the owner.
- There is no compensation requirement for an owner of a designated property.
- Designation can be undertaken quickly.
- Any form of real property can be identified and protected in a designation bylaw, including buildings, structures, open space, landscape features, trees and plantings.
- Compared with expropriation or purchase, designation is an extremely cost-effective way to protect a heritage property.
- Designation provides the fundamental and legal eligibility criteria for a municipality to use in awarding any heritage incentives, including grants, planning incentives and property tax rebates.

From a property owner's perspective, the Designation process can be impactful particularly to those who do not wish to have their property designated. The impacts can include restrictions on the use and enjoyment of property. Depending upon the nature of the Designation by-law, restrictions could be imposed on alterations to features of the building, structure or landscape. This includes restrictions on demolition and redevelopment.

There have been studies conducted which have suggested that there are little or no negative property value impacts as a result of the Designation process. Individual circumstances will vary depending upon market conditions and property specifics and it is not possible to be definitive on the subject. Property owners have indicated that there are a variety of complications associated with heritage property ownership including increased insurance and maintenance costs and difficulties with mortgage financing. It is unclear whether these complications are inherent to older buildings in general and to what extent they are exacerbated by being Listed or Designated. In

response to these types of concerns, and to encourage heritage preservation, some municipalities have instituted tax rebate programs and other incentives to offset the impacts of a heritage designation on a property.

There can be no question that the Designation of a property under the *Ontario Heritage Act* represents an imposition on a property owner in order to achieve a public policy objective. It is for this reason that the legislation establishes criteria and regulations to ensure effective and appropriate use of the powers vested in the Act, including requirements for notice and the ability to appeal.

### 5.7 NEXT STEPS

Staff continue to receive comments and inquiries from landowners of Listed properties as of the date of report preparation. It is expected that once the staff report and the draft CHER are released that comments will continue to be received.

Following the October 9, 2024 Council meeting, staff will review all comments from Council and the public in detail, along with the draft CHER and preliminary assessment of Listed properties produced by the Consultant. Additional consultation with property owners and stakeholders will take place, as well as an outreach to owners of Listed properties which the CHER has preliminarily identified as meeting two or more of the criteria for Designation.

Given the magnitude of this undertaking and the response from property owners, staff will examine an approach / option to the potential Designation of listed properties that Council can consider in addition to the minimum criteria established in the *Ontario Heritage Act*. This may include such matters as ranking, priority and property owner input amongst other matters. Now that the Province has extended the deadline to Designate Listed properties to January 1, 2027, some additional time is available to complete the project, consider input and more carefully assess next steps.

It is proposed that staff return to Council no later than Q2 of 2025 with a report recommending future steps and options, once the additional consultation, review and outreach is completed.

## 6. RELATIONSHIP TO STRATEGIC PLAN (2023-2027):

This report does not address a specific strategic goal as identified in the Town's Strategic Plan but is a critical step of due diligence undertaken by the Town to ensure that potential heritage resources within the municipality are considered for protection for the long-term public benefit.

## 7. FINANCIAL AND BUDGETARY IMPACT:

There are no financial or budgetary impacts associated with this report.

The project remains within the Council approved budget as of the completion of this report.

Should Council proceed with the Designation of properties, landowners will have a right to appeal Council's decision to the Ontario Land Tribunal (OLT) under the *Ontario Heritage Act*. Costs that would be incurred by the Town to defend against any appeals at an OLT hearing(s) would not be covered by the project's budget and would require a separate source of funding.

## **8. CONCLUSION:**

The changes to the *Ontario Heritage Act* in 2022 that set in motion the current review of the Heritage Register are unprecedented and have placed profound demands on municipalities to undertake expedited reviews of their existing Listed properties and advance them to Designation by January 1, 2025 or have them removed from their listed registers. In response to feedback from municipalities and stakeholders, the Province has extended this deadline by 2 years to January 1, 2027.

The Town's study process has been designed to enable Council an opportunity to consider its Listed properties by the original provincial deadline of January 1, 2025.

On that basis, the original timing for a second staff report to Council to recommend which properties should be considered for Designation was originally scheduled for the November 20, 2024 Council meeting. The extension of the deadline by the Province to January 1, 2027 now provides additional time for the Town to undertake a more thoughtful and consultative approach to this matter. This is particularly important given the number of properties that have been identified in the consultant's draft CHER as potentially meeting the criteria in the Act for Designation, and the level and nature of property owner comments.

Given the magnitude of this undertaking and the response from property owners, staff will examine approaches / options to the potential Designation of Listed properties that Council can consider in addition to the minimum criteria established in the *Ontario Heritage Act*. This may include such matters as ranking, priority and property owner input amongst other matters. It is proposed that staff report back to Council on this matter no later than Q2 of 2025.

## **APPROVALS**

Prepared By:

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Senior Policy Planner

Reviewed By: Alan Drozd, MCIP, RPP  
Manager of Planning Policy

Recommended By: Denis Beaulieu, MCIP, RPP  
Director of Development Services

Approved By: Ryan Cronsberry,  
Chief Administrative Officer

**Attachments:**

Attachment 1 – Public comments received

Attachment 2 – Map showing Listed property owners and their position on Designation (based on comments received)

Attachment 3 – Section 8.8 of the Official Plan, Cultural Heritage and Archaeological Resources

Attachment 4 – Jackson’s Point Marine Railway, Statement of Significance

Attachment 5 – Draft CHER with preliminary assessment for Designation