



March 26, 2024

To: Honourable Mayor Danny Breen, Deputy Mayor Sheilagh O’Leary, and members of the St. John’s City Council

This letter is in response to the proposal for an infill development at 34 Monkstown Rd, in St. John’s Heritage Area 2. The building, as proposed, would be acceptable almost anywhere else in the city, but the design as it currently stands is, unfortunately, a poor fit for our dwindling heritage areas and should not be permitted to move forward without modifications.

Some quick statements of context may be useful:

- St. John’s stock of heritage buildings is small and getting smaller.
- The allowance of vinyl siding was perhaps well-intentioned once upon a time as a way to ward off gentrification of the downtown, but is now being **exploited as a loophole by wealthy homeowners and developers** to save money or to make more money from a sale.
- Standards for restoration and new construction are *in desperate need of updating* to avoid this backwards slide.

Homeowners who purchase in a Heritage Area do so with the awareness that buildings in this historic part of the city come with certain regulations and restrictions. Indeed, whether they realise it or not, the architecture of the historic downtown is likely what leads them to move here. Anyone familiar with high quality historic districts in Quebec City, Montreal, Nova Scotia, various cities and villages in Italy or the U.K., has seen with their own eyes how effective the standards have been in preserving these unique places – while keeping them alive and vibrant.

One of our major obstacles is that Heritage Area 2 is rapidly becoming covered in vinyl, *undermining the integrity of the historic streetscape*. This, of course, costs all of us, as citizens, and business owners who depend on the standards of heritage areas to uphold a cohesive, attractive, streetscape – in other words, to keep this asset in good condition.

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Luckily there is action that council can take to begin repairing the damage, by postponing this application for now, until modifications are made, and then working to bring our lagging Heritage Areas up to the standards of Heritage Area 1.

Ironically, today we're discussing a new build. That's because how we go about new development in a heritage district is just as important as maintaining standards for existing buildings.

Although if you were to squint at the sketch of the proposal from a distance, it appears to echo some of the details of a hundred-year-old heritage home, anyone with knowledge of what actually makes our historic buildings tick can instantly spot the difference. In brief: the second-floor windows are too wide and squat; the garage belongs in the suburbs; the "curtain wall" windows in the centre lack context; the vinyl siding and vinyl windows are **fake heritage and not the real thing**.

Council may be surprised to learn that the board of the Historic Trust would **actually prefer a contemporary design**. One that – to quote the [Jan. 31 minutes](#) of the city's Built Heritage Experts Panel– represents an "exceptional" piece of architecture. Ironically again, this site was once offered as a package deal with just such a design, one that meets exactly that criteria, by noted Newfoundland and Labrador architect Beaton Sheppard (see image attached). Why would we prefer an excellent, but contemporary design? Because accurately replicating a heritage building is rarely done well, and when a thoughtful, vernacular design emerges, based on our climate and history, it's a beautiful addition to a historic streetscape that represents our own time and place, and will live on.

The Beaton Sheppard design takes care of many of the heritage community's complaints:

- The garage is moved to the rear of the property to echo its neighbours,
- It's built with clapboard (though in a modern style with mitred corners), and
- It echoes neighbouring designs with a handsome mansard-style roof, while remaining distinctly modern.
- It does not pretend to be something it is not.

The Trust also notes that the applicant has requested a height increase. What are citizens receiving in return for this request? At the least, these minor design requests should be met. We're in the midst of a housing crisis. Let's not pretend this is a nonprofit asking for permission to design an apartment building. Every sign so far

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indicates this is a single-family mansion, with costs nearing or exceeding a million dollars. We'd be much more sympathetic if the design was a credit to this heritage district.

34 Monkstown is indeed **surrounded by some of the best heritage buildings the province has to offer**. Harris cottage across the street, one of the oldest buildings in the province; 36 Monkstown, an elaborate, beautiful residence that's long been a registered heritage property; 30 Monkstown and 28 Monkstown, both belonged to the Southcott family, the designers and builders responsible for the look and feel of the downtown core as it appears today, the people who popularized the mansard roof as the dominant feature of downtown homes. This is just a list of immediate neighbours. It's also one block away from the Rennies Mill Road National Historic District.

From the minutes of the BHEP meeting, the applicants appear reluctant to budge on these complaints. The Trust would note that the heritage community needs willing partners in this enterprise. As members of council, you are stewards of a small and fragile heritage areas. You have the power to guide their future.

We are available at your convenience to discuss this application, and the bigger issue of how we move forward to improve the current situation for design standards in the city's heritage areas, bringing them in line with Heritage Area 1.

Kind Regards,

Board of Directors
Newfoundland and Labrador Historic Trust

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34 MONKSTOWN

Application is for a Single Detached Dwelling at 34 Monkstown Road, which is located adjacent to a designated Heritage Building in Heritage Area 2. Section 11(1)(e) of the St. John's Heritage By-Law requires public consultation for an application for a new development located next to a Heritage Building. The City is considering the proposed building design shown below in accordance with the Heritage Design Standards for new buildings in a Heritage Area. The applicant is also requesting consideration for the approval of a variance on the Building Height. The maximum height requirement in the Residential 1 (R1) Zone for a Single Detached Dwelling is 8m. A 10% variance is requested which will result in a Dwelling Building Height of 8.8m. Section 7.4 of the Envision St. John's Development Regulations can allow Council to grant a Variance from the applicable requirements to a maximum of 10%.

Comment by: 9:30 a.m. Tuesday, March 26, 2024. Council decision date: April 16, 2024.

