

Heritage Districts Work!

Heritage Conservation District Study
King Street East - Town of Cobourg
2009



Heritage Conservation District Study 2009

Prepared By

The Architectural Conservancy of Ontario

(North Waterloo and Hamilton Branches)

With the Assistance of

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The efforts of the volunteers were assisted and coordinated through cooperation between the ACO and the Heritage Resources Centre (HRC) at the University of Waterloo. Professor Robert Shipley is the Director of the HRC. The Project Coordinator, report manager and principal volunteer facilitator was Kayla Jonas. Additional data collection and research analysis was conducted by Jason Kovacs, Beatrice Tam and Martha Fallis. Administration and help was also provided by Marg Rowell, Chelsey Tyers, Paul Dubniak and Kirsten Pries.

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We would also like to thank the following local volunteers and municipal staff for their time and effort surveying residents, answering interview questions and helping to gather other vital information: Rob Franklin and Stephanie Barber.

Thanks!

King Street East Executive Summary

Introduction

- This study of Heritage Conservation Districts has been funded by the Ontario Trillium Foundation and is a joint effort among volunteers of the Architectural Conservancy of Ontario, the Heritage Resources Centre and volunteer historical societies across the province
- The Ontario Heritage Act enables municipalities to designate Heritage Conservation Districts (HCDs)
- Heritage Conservation Districts allow municipalities to guide future changes in these areas of special character
- 32 districts designated in or before 1992 were examined

Background of King Street East Heritage Conservation District

- Located in the Town of Cobourg
- Consists of 130 commercial properties
- The district was designated in 1990
- Plan was written by Robert D. Mikel with the assistance of Margaret Baily

Study Approach

- Resident surveys were conducted door to door by members of the Heritage Resources Centre
- Land use mapping and a streetscape evaluation were conducted
- Sales history trends were collected from GeoWarehouse™ and analyzed
- A key stakeholder was interviewed

Analysis of Key Findings

- The following objective of the district plan has been met:
 - to promote and enhance distinct historic areas
- The following objectives of the district plan have been less successful:
 - to ensure through guidelines, increased cohesion and compatibility with existing built form
 - to provide comprehensive administration which is simple and efficient
- 66% of the people surveyed are very satisfied or satisfied with living or owning property in the district
- Four of nine properties had average or above average sales history trajectories while five performed below average
- Designation is not a factor in property values
- Overall, the King Street East Heritage Conservation District has been a successful planning initiative

Recommendations

- Track alteration requests in a comprehensive and easily accessible manner
- Sell the benefits of the Heritage Conservation District as an advantage to business owners and tenants
- Transfer more responsibility for the district to the Heritage Staff

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1.0 Introduction

1.1 Heritage Act and Designation

The *Ontario Heritage Act* (Subsection 41. (1)) enables municipalities to designate Heritage Conservation Districts (HCDs). A Heritage Conservation District is an area with “a concentration of heritage resources with special character or historical association that distinguishes it from its surroundings”¹. Districts can be areas that are residential, commercial, rural, industrial, institutional or mixed use. According to the Ministry of Culture “the significance of a HCD often extends beyond its built heritage, structures, streets, landscape and other physical and special elements to include important vistas and views between buildings and spaces within the district”².

The designation of a Heritage Conservation District allows municipalities to protect the special character of an area by guiding future changes. The policies for guiding changes are outlined in a Heritage Conservation District Plan that can be prepared by city staff, local residents or heritage consultants. A Heritage Conservation District Plan must also include a statement of objectives and guidelines that outline how to achieve these objectives³.

1.2 Rationale for Heritage Conservation District Study

Many people now consider the Heritage Conservation District to be one of the most effective tools not only for historic conservation, but for good urban design and sound planning. At least 92 HCDs are already in existence in Ontario with the earliest designations dating back to 1980. While more are being planned and proposed all the time there is also a residual resistance to HCDs from some members of the public. Typically this resistance centres on concerns about loss of control over one’s property, impact on property values and bureaucratic processes. On the other hand, the benefits of HCDs, establishing high standards of maintenance and design, allowing the development of and compliance with shared community values and the potential for increasing property values, are not as widely perceived as might be the case.

With funding from the Ontario Trillium Foundation, volunteers from branches of the Architectural Conservancy of Ontario (ACO) and Historical Societies were assisted by the Heritage Resources Centre (HRC) at the University of Waterloo to undertake a province wide research program to answer the question: have Heritage Conservation Districts in Ontario been successful heritage planning initiatives over a period of time?

Since it takes a period of time for the impacts of district designation to manifest this study concentrated on examining districts that are well established. Applying the criterion of residential, commercial or mixed use areas designated in 1992 or before there were 32 HCDs that the study examined. These districts are found in or near the following areas: Cobourg, Hamilton, Kingston, Ottawa, St. Catharines, Huron County, Brampton, Toronto, Ottawa, the Region of Waterloo and Thunder Bay.

¹ Ontario Heritage Toolkit, Heritage Conservation Districts, Ministry of Culture (2006), Page 5

² Ontario Heritage Toolkit, Heritage Conservation Districts, Ministry of Culture (2006), Page 5

³ Ontario Heritage Toolkit, Heritage Conservation Districts, Ministry of Culture (2006), Page 12

Figure 1 shows that the 32 districts have a wide geographic distribution and represent the various community sizes. The various types of districts which are part of the study are also evident.

Geographical Distribution		Community Size		Type	
Northern	1	Small Community	9 ~	Commercial	9~
Eastern	11 *	Medium Sized	11	Residential	18*
Central	12	Large City	12 *	Mixed	5
South Western	8 ~				
	32		32		32

* 5 of these districts make up the HCD known as Sandy Hill
 ~ 2 of these districts make up the HCD known as Goderich Square

Figure 1: Distribution of Heritage Conservation Districts under Examination

The study sought to answer the following specific questions in each of the 32 Heritage Conservation Districts:

- Have the goals or objectives set out in the District Plan been met?
- Are residents content living in the Heritage Conservation District?
- Is it difficult to make alterations to buildings in the Heritage Conservation District?
- Have property values been impacted by the designation of the district?
- What are the key issues in the district?

These questions were answered through the contributions of local volunteers from the Architectural Conservancy of Ontario branches, Historical Societies and local heritage committees as well as through communication with local municipal officials.

2.0 Background of King Street East Heritage Conservation District

2.1 Description of the District

The King Street East Heritage Conservation District is located along King Street between Ontario Street to the west and College Street to the east, in the Town of Cobourg. The district contains 130 properties. These properties are predominantly commercial with some residential and public buildings.

2.2 Cultural Heritage Value of the District

According to the King Street East District Plan the value of the district is:

“The area is the geographic centre of Cobourg. It contains the major commercial centre, the municipal offices and many public institutions. Mostly constructed before the turn of the century the uniform density and situation of the buildings plus their surviving period details create an appealing continuity and uniformity rarely surviving in Ontario’s urban centres.

The commercial area is characterized by largely two to three storey commercial buildings built largely between 1840 and 1890 with subsequent infill development that has continued in small spurts to the present day. The commercial core is quite dense with many of the buildings covering most of the lot or lots. Most of the space in the area is given over to commercial use but there are also offices, some residential and storage components.

Architecturally the district first appears to be uniform but on closer inspection one can see the great diversity that has come to the area over time as a result of active and sometimes intense commercial activity”⁴.

2.3 Location of the District

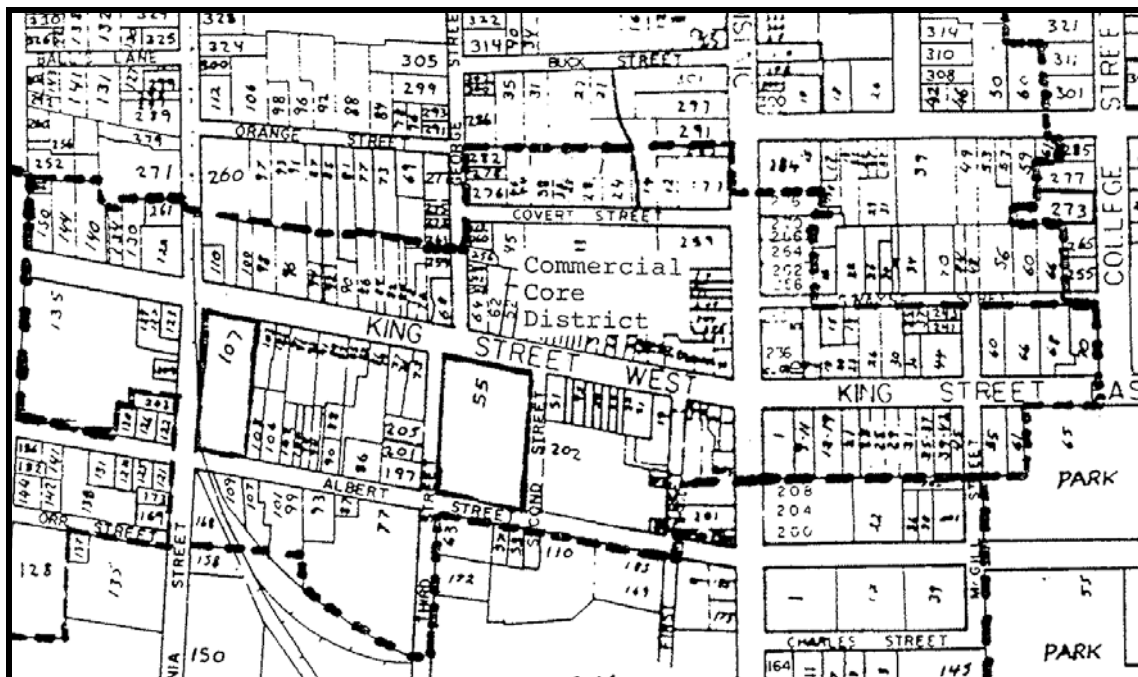


Figure 2: Map of King Street East Heritage Conservation District

⁴ Mikel, D. Robert. Heritage Conservation District Study, Town of Cobourg, 1991.

2.4 Designation of the District

The King Street East Heritage Conservation District is protected by By-law 27-90 which was passed on February 19, 1990 by the Town of Cobourg. The King Street East Heritage Conservation District Plan was prepared for the Town of Cobourg by Robert D. Mikel with the assistance of Margaret Baily and in conjunction with the Town of Cobourg.

The Heritage Conservation District Plan contains sections on the summary of recommendations, evaluation of work, research and analysis, historical importance of the town of Cobourg, areas of character, significance, boundaries, development trends, the official plan, policies and the Cobourg LACAC.

3.0 Study Approach

3.1 Resident Surveys

Residents of the King Street East Heritage Conservation District were asked a series of questions relating to their experiences and satisfaction living in the district. These surveys were conducted door to door by members of the Heritage Resources Centre. Thirty-nine of 130 residents answered surveys, representing a 30% response rate. The tabulated findings of the survey are presented in Appendix A.

3.2 Townscape Survey

A Townscape Survey of King Street East was conducted in August 2008. The purpose of this survey is to provide an objective way to evaluate streetscapes. There are two elements to the survey; land use mapping and a streetscape evaluation. Land use maps, which represent the current use of buildings in the district, were produced for King Street East (see Appendix B). The streetscape evaluation involves the use of a view assessment pro forma which generates scores between one and five for 25 factors in view. A total of 15 views were photographed and evaluated (see Appendices C and D). The summary of the scores is included as Appendix E.

3.3 Real Estate Data

Sales history trends for properties within each Heritage Conservation District under study were calculated and compared against non-designated properties in the immediate vicinity of each district. Sales records spanning an average 30 year period range were identified for individual district properties using GeoWarehouse™, an online subscription database commonly used by real estate professionals.

Properties with more than one record of sale were plotted on graphs and compared with the average sales figures for non-designated properties. A number of sales property averages were obtained for each “non-designated area” within a 1 km radius from the district. The mean selling price for these property averages, which were also obtained through GeoWarehouse™, were calculated and plotted against each district unit sales record (see Appendix F)⁵. It was expected that the use of average sales prices from the immediate vicinity of a district as opposed to the use of city-wide sales trends would provide a more accurate comparative record to show how the district designation status itself affects property values. Aside from the locational factor (*i.e.* properties located within an district), it must be recognized that this study did not take into account a variety of other issues that can also affect sales prices (*e.g.* architecture, lot size, *etc.*).

3.4 Key Stakeholder Interviews

People who had special knowledge of each district were interviewed for their experiences and opinions. These stakeholders often included the local planner, the chair or a member of the Municipal Heritage Committee and members of the community association or BIA. One person was interviewed for the King Street East district over the phone. A summary of their responses is included in Appendix G. Interviewees are not identified in accordance with the University of Waterloo policy on research ethics.

⁵ The method for obtaining the average sales price for non-designated areas within the 1 km radius was adjusted according to the number of properties within a Heritage Conservation District. For example, to obtain figures on non-designated areas, average sales histories within a 1 km radius from the largest districts (201-600 properties) were obtained using every fiftieth district property as a basis for calculating each area sales record. The mean average of these sales records were subsequently calculated and used as the comparative sales history trend on each graph. Every fifth, tenth, and twenty-fifth property were used to find the immediate average sales histories within a 1 km radius for smaller districts with 1-10, 11-100 and 101-200 properties respectively.

3.5 Requests for Alterations

With respect to the requests for alterations within the Heritage Conservation Districts, the study wished to answer these questions in each district:

- How many applications for building alterations have been made?
- How many applications have been approved or rejected?
- How long did the application process take for individual properties?
- What type of changes were the applications for?

For the King Street East Heritage Conservation District the information regarding alteration requests was not available.

4.0 Analysis of Key Findings

4.1 Have the goals or objectives been met?

The Heritage Conservation District Plan prepared in 1991, states that the goals will be met through objectives which fall within three categories:

a) Promote and enhance distinct historic areas

The objective to promote and enhance distinct historic areas has been met. Drawing on measures collected in the Townscape Survey, detailed maintenance and absence of dereliction both scored high. This means that the area has been maintained. High scores in public planting, signage and street furniture also contribute to the visual confirmation that the Town of Cobourg takes pride in their heritage (see Figure 3). The one area in which the score is low is historic reference seen. This means that there is no indication to the significance of the buildings in the area.

b) Ensure through guidelines, increased cohesion and compatibility with existing built form

The second objective, to ensure through guidelines, increased cohesion and compatibility with existing built form has not been met. Low scores on the Townscape Survey in the categories of quality of new development and quality of conservation work shows that visually the area has not maintained its historic elements and existing buildings. This low score and the corresponding picture (see Figure 4) show that there are some newer structures in the district that are not compatible. While these buildings may have been constructed prior to the designation of the district they demonstrate the need to control new construction. Although there are building guidelines in the King Street East District Plan, it is evident they are not being followed.

c) Provide comprehensive administration which is simple and efficient

The objective to provide comprehensive administration which is simple and efficient has not been met. It is difficult to determine the communication process within the district because the stakeholder did not mention any. According to resident surveys there is tension between the Town and the business owners in the district. This is an area for improvement.

4.2 Are people content?

Two questions in the resident surveys addressed people's contentment with living or owning a property within the district. In spite of the fact that four out of five residents were apprehensive about the district at the time of designation, now 26 out of 39, or 66%, of the residents are either satisfied or very satisfied with living or owning property in the district. Eight people are neutral about the district and five are dissatisfied with the district.



Figure 3: An example of view with a high score in public planting



Figure 4: An example of development that is not compatible

4.3 Is it difficult to make alterations?

Of the residents surveyed 15 people said they had made an alteration request. Three of 15 were not approved and the rest of the applications were approved within a month. According to the stakeholder the alteration requests take about two to three weeks. There was no data available from the Town of Cobourg. There is some concern about the consistency of decisions on applications for change. The process for completing alterations appears to present some opportunities for improvement.

4.4 Have property values been impacted?

According to the resident surveys 35% of people felt that the designation would increase their property values and 16% felt it would decrease their property values. Forty-five percent felt there would be no impact on their property values. Sixty-two percent of the residents surveyed felt the designation would not affect their ability to sell, however 19% felt that the designation would make it harder to sell their property. Clearly, people in King Street East are not overly worried about property sales.

The data from GeoWarehouse™ indicated that nine of 130 properties had sales histories. Of these nine properties three had above average sales value increases (see Figure 5). One property performed average and the remaining five all performed below average. These trends indicate the designation is not a factor in the property values because this distribution would be expected from any random sample.

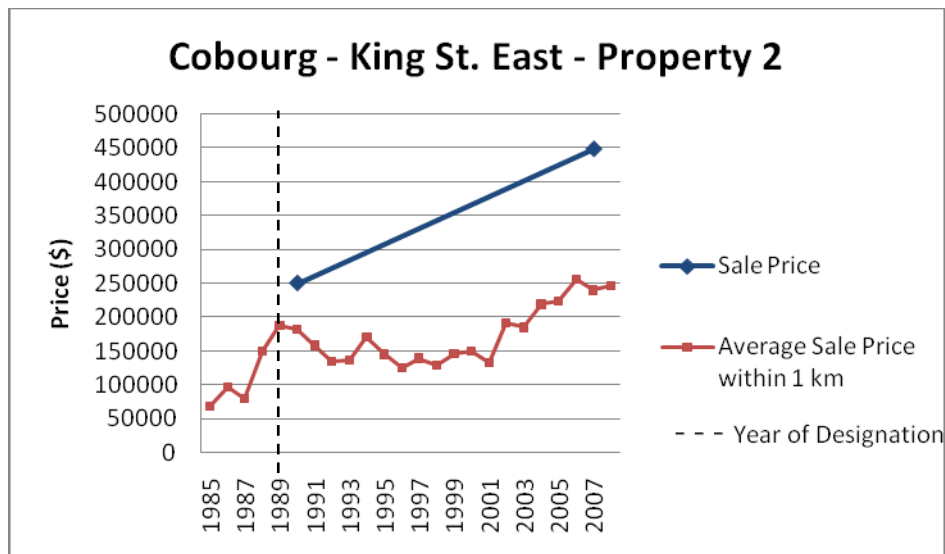


Figure 5: Above Average Sales History Trajectory

4.5 What are the key issues in the district?

a) Not embracing heritage

One significant issue expressed throughout the resident surveys is that there is a vocal minority of business owners who have not embraced the heritage concept for marketing and planning purposes. The business owners might do better to embrace the heritage aspect of the district instead of trying to compete with the edge of town shopping centres. This might be the reason for some of the low scores in the Townscape Survey.

b) Staff responsibility

There is some feeling that more of the management of the district should rest with the staff, who now only have an advisory role, rather than totally with the heritage committee. This might improve the consistency of decisions.

5.0 Conclusions

5.1 Conclusions

- The following objective of the district plan has been met:
 - to promote and enhance distinct historic areas
- The following objectives of the district plan have been less successful:
 - to ensure through guidelines, increased cohesion and compatibility with existing built form
 - to provide comprehensive administration which is simple and efficient
- 66% of the people surveyed are very satisfied or satisfied with living or owning property in the district
- Four of nine properties had average or above average sales history trajectories while five performed below average
- Designation is not a factor in property values

Overall, the King Street East Heritage Conservation District has been a successful planning initiative.

5.2 Recommendations

The following aspects of the district are areas for improvement:

- Track alteration requests in a comprehensive and easily accessible manner
- Sell the benefits of the Heritage Conservation District as an advantage to business owners and tenants
- Transfer more responsibility for the district to the Heritage Staff

Appendices

Appendix A

Tabular Results of Resident Surveys

King Street East – Cobourg

1. Are you the owner or tenant of this property?

Responses

	Owner	Tenant-Commercial	Tenant - Residential
Counts	13	26	0
Percentage	33.33	66.67	0.00

2. Are you aware you live within a HCD?

Responses

	Yes	No
Counts	39	0
Percentage	100.00	0.00

3. Did you move here before or after the area was designated?

Responses

	Before	After
Counts	14	24
Percentage	36.84	63.16

4. If you lived here before designation, how did you feel about it at the time?

Responses

Positive	1
Negative	1
Neutral	3
Mixed Feelings	0
Do Not Know	1

5. If you came after the designation did the designation affect your decision to move here?

Responses

	Yes	No
Counts	0	24
Percentage	0.00	100.00

6. What is your understanding of how the HCD works?

Responses

Preserve	17
Restrict	11
Guidelines	4
Committee	5
Do not know	9

Additional Comments: bureaucracy (1), not your vision (1), make it as hard as possible to have a business (1)

Note: Residents could provide more than one response to question 6

7. Have you made application(s) for building alterations?

Responses

	Yes	No
Counts	15	22
Percentage	40.54	59.46

8. If so, were your applications for alterations approved?

Responses

	Yes	No
Counts	12	3
Percentage	80.00	20.00

9. On average, how long did the application take?

Responses

Over 5 months	0
4 to 5 months	0
1 to 3 months	4
Less than 1 month	9
Not long	1

10. Overall, how satisfied are you with living in a HCD?

Responses

	Mean Score out of 5	Very Satisfied	Satisfied	Neither Satisfied or Dissatisfied	Dissatisfied	Very Dissatisfied	Do not Know
Counts	3.82	13	13	8	3	2	0
Percentage		33.33	33.33	20.51	7.69	5.13	0.00

11. How do you think the HCD designation has affected the value of your property compared to similar non-designated districts?

Responses

	Mean Score out of 5	Increased a Lot	Increased	No Impact	Lowered	Lowered a lot	Do not Know
Counts	3.23	1	11	14	5	0	7
Percentage		2.63	35.48	45.16	16.13	0.00	18.42

12. Do you think the HCD designation will affect your ability to sell your property?

Responses

No	20
Yes	0
Yes, easier	0
Yes, harder	6
Don't know	0
Maybe	5

13. Comments

Additional Comments: Overkill especially in hard economic times (1), Port Hope is better- more unified (1), favouritism (1), should be able to control your own property (4), long term impact on viability (1), Town Hall almost lets anything happen (1), rather not be in the HCD (1), never want to live anywhere else (1)

Total Population	130
Participants	39
Participation Rate	30

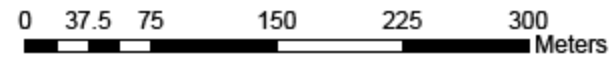
Appendix B
Land Use Maps

Ground Level Land Use in King Street East Heritage Conservation District, Cobourg



Legend

HCD Boundary	Office / Commercial	Services
Not in HCD	Parking	Soft or hard landscaping
Eating / Drinking Places	Public buildings	Under development
Industrial	Residential	Vacant
Land use not assigned	Retail (low end - DS)	Warehouse / Storage
Leisure	Retail	



Author: Heritage Resources Centre
 January 19, 2009
 Data Provider: Teranet Inc.
 Coordinate System: NAD_1983_UTM_Zone_18N

Second Floor Land Use in King Street East Heritage Conservation District, Cobourg



Legend

HCD Boundary	Office / Commercial	Services
Not in HCD	Parking	Soft or hard landscaping
Eating / Drinking Places	Public buildings	Under development
Industrial	Residential	Vacant
Land use not assigned	Retail (low end - DS)	Warehouse / Storage
Leisure	Retail	

0 37.5 75 150 225 300 Meters



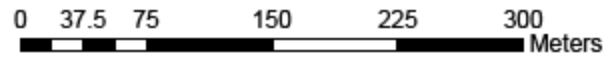
Author: Heritage Resources Centre
 January 19, 2009
 Data Provider: Teranet Inc.
 Coordinate System: NAD_1983_UTM_Zone_18N

Third Floor Land Use in King Street East Heritage Conservation District, Cobourg



Legend

- | | | |
|--------------------------|-----------------------|--------------------------|
| HCD Boundary | Office / Commercial | Services |
| Not in HCD | Parking | Soft or hard landscaping |
| Eating / Drinking Places | Public buildings | Under development |
| Industrial | Residential | Vacant |
| Land use not assigned | Retail (low end - DS) | Warehouse / Storage |
| Leisure | Retail | |

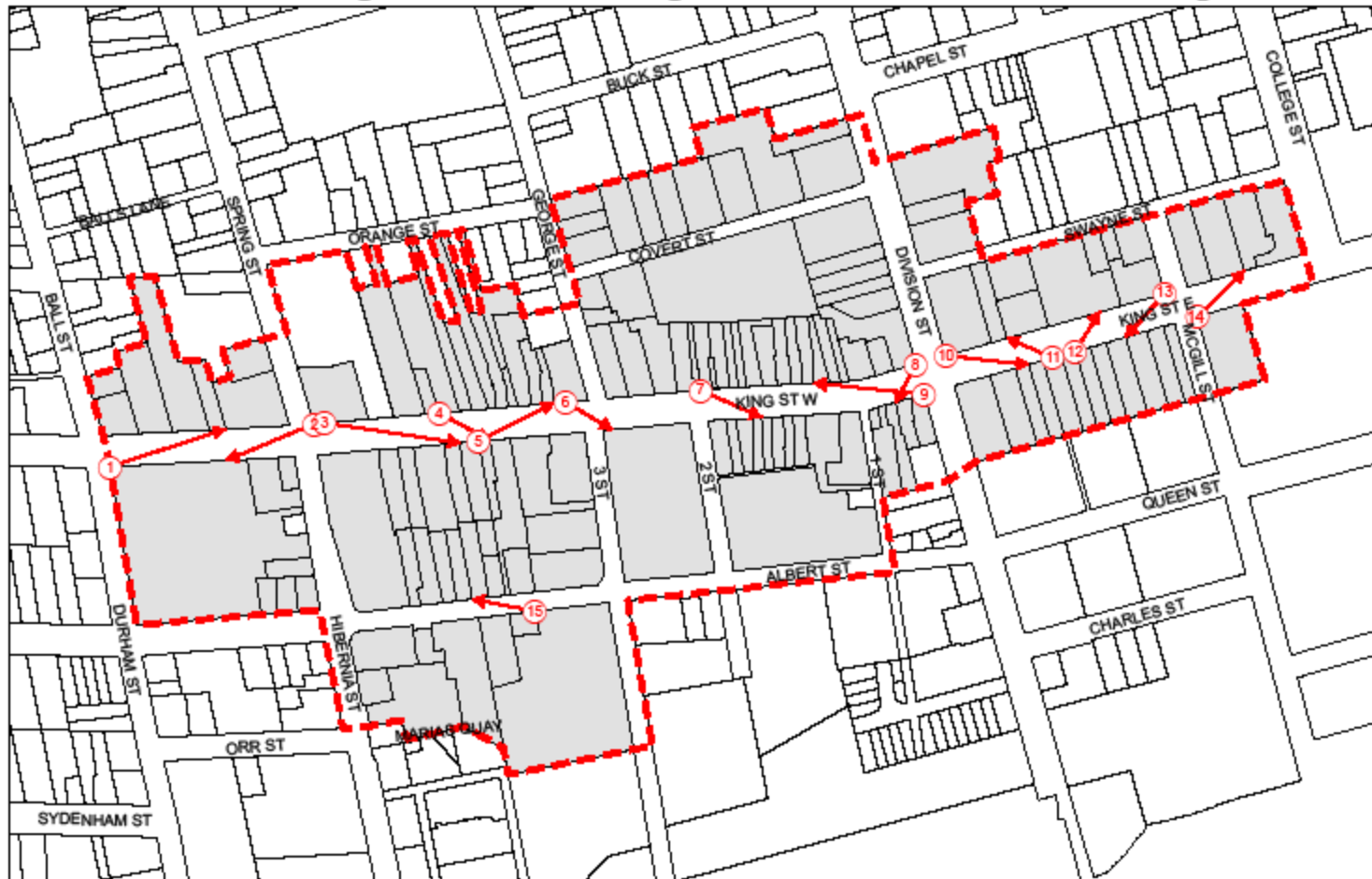


Author: Heritage Resources Centre
 January 19, 2009
 Data Provider: Teranet Inc.
 Coordinate System: NAD_1983_UTM_Zone_18N

Appendix C

Map of Views

Views in King Street East Heritage Conservation District, Cobourg



Legend

- Viewpoints
- Viewlines
- HCD Boundary
- Not in HCD
- In HCD

0 37.5 75 150 225 300
Meters

Author: Heritage Resources Centre
 January 19, 2009
 Data Provider: Teranet Inc.
 Coordinate System: NAD_1983_UTM_Zone_18N



Appendix D
Photographs of Views



View 1



View 2



View 3



View 4



View 5



View 6



View 7



View 8



View 9



View 10



View 11



View 12



View 13



View 14



View 15



View 16

Appendix E

Townscape Evaluation Pro Forma

Heritage Conservation District Townscape Summary

Name of District: Cobourg

Date: August 1, 2008

A. Streetscape Quality				
	Score	Out of	%	Out of 5
A1-Pedestrian Friendly	60	75	80.00	4.0
A2-Cleanliness	50	75	66.67	3.3
A3-Coherence	48.5	75	64.67	3.2
A4-Edgefeature Quality	55	75	73.33	3.7
A5-Floorscape Quality	58	75	77.33	3.9
A6-Legibility	54.5	75	72.67	3.6
A7-Sense of Threat	61	75	81.33	4.1
A8-Personal Safety: Traffic	32.5	40	81.25	4.1
A9-Planting: Public	58	70	82.86	4.1
A10-Vitality	51	75	68.00	3.4
A11- Appropriate Resting Places	54	75	72.00	3.6
A12-Signage	50.5	65	77.69	3.9
A13-Street Furniture Quality	63	75	84.00	4.2
A14-Traffic Flow Appropriateness	34	40	85.00	4.3
SUM A	730	965	75.65	3.8

B. Private Space in View				
	Score	Out of	%	Out of 5
B15-Advertising, In keeping	42	70	60.00	3.0
B16-Dereliction, Absence of	61.5	75	82.00	4.1
B17-Detailing, Maintenance	57	75	76.00	3.8
B18-Facade Quality	50.5	75	67.33	3.4
B19-Planting: Private	15	20	75.00	3.8
SUM B	226	315	71.75	3.6

C. Heritage in View				
	Score	Out of	%	Out of 5
C20-Conserved Elements Evident	47.5	70	67.86	3.4
C21-Historic Reference Seen	30	75	40.00	2.0
C22-Nomenclature/Place Reference	57	75	76.00	3.8
C23-Quality of Conservation Work	40.5	70	57.86	2.9
C24-Quality of New Development	13.5	30	45.00	2.3
C25-Historic Features, Maintained	51	70	72.86	3.6
SUM C	239.5	390	61.41	3.1

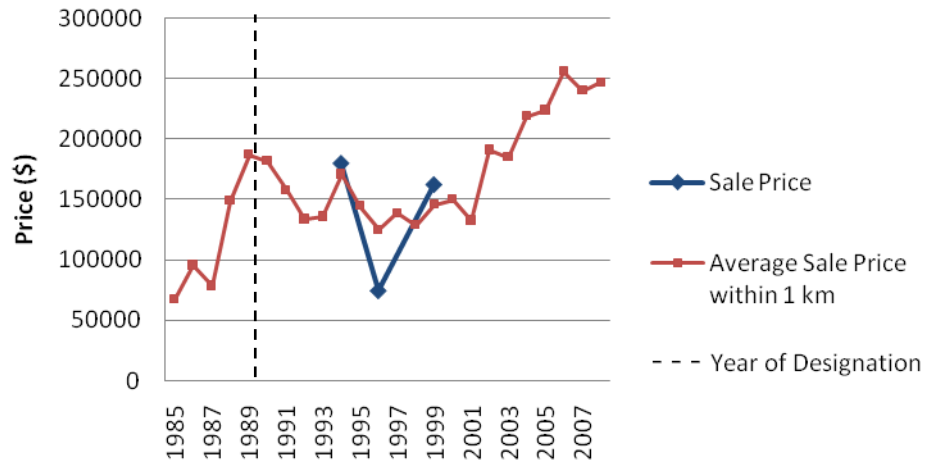
Impression Score				
Aggregate Score	1196	1670	71.59	3.6

Weather: Sunny

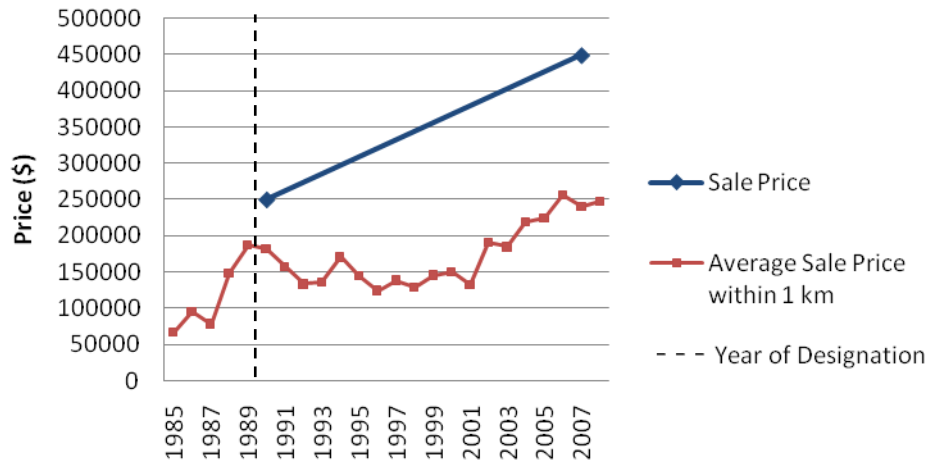
Views: 15

Appendix F
Real Estate Data

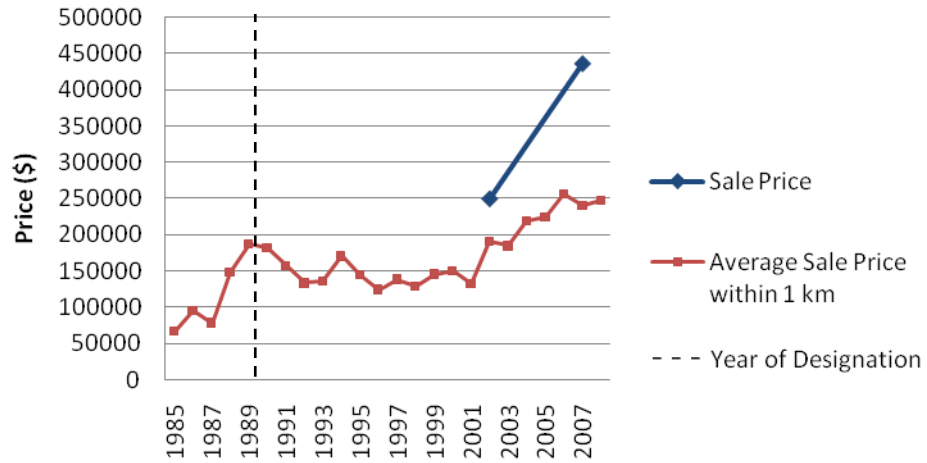
Cobourg - King St. East - Property 1



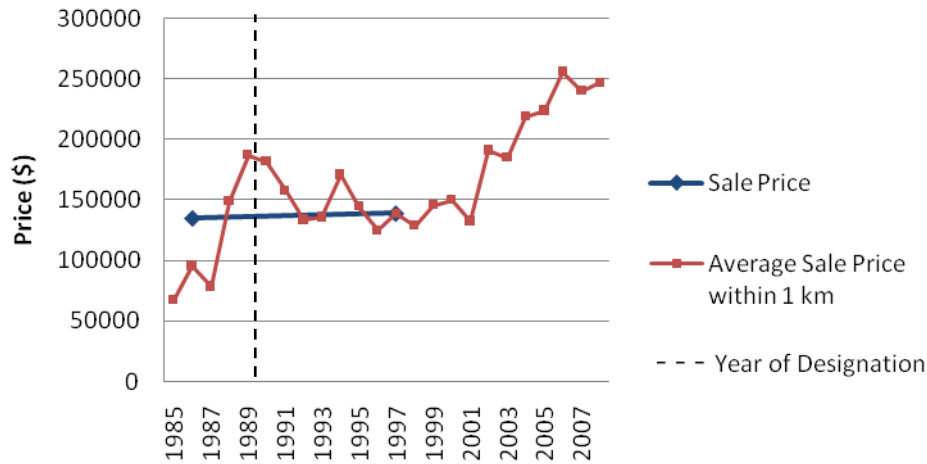
Cobourg - King St. East - Property 2



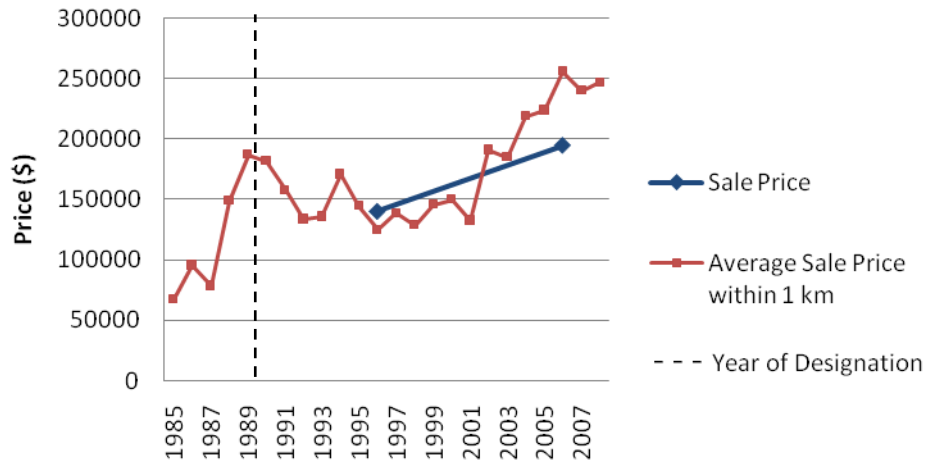
Cobourg - King St. East - Property 3



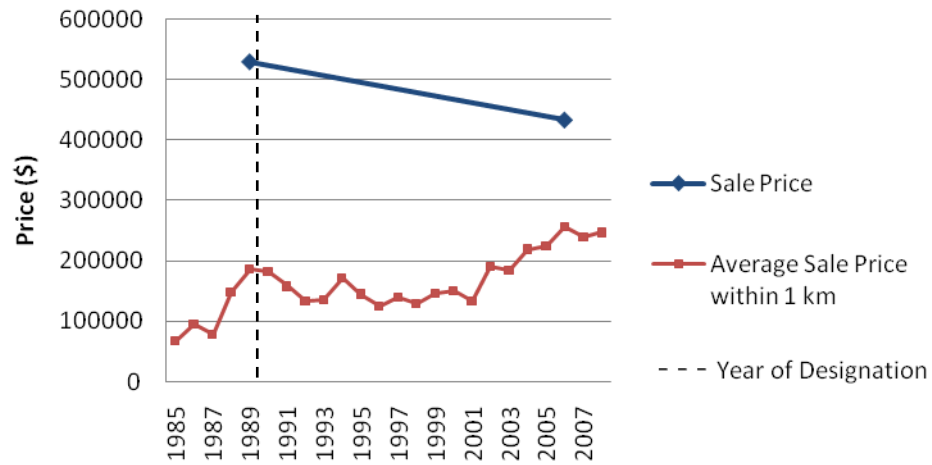
Cobourg - King St. East - Property 4



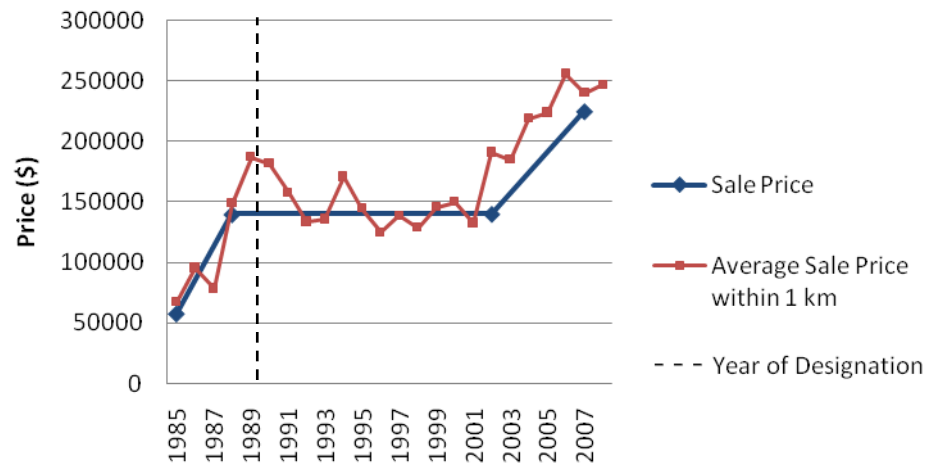
Cobourg - King St. East - Property 5



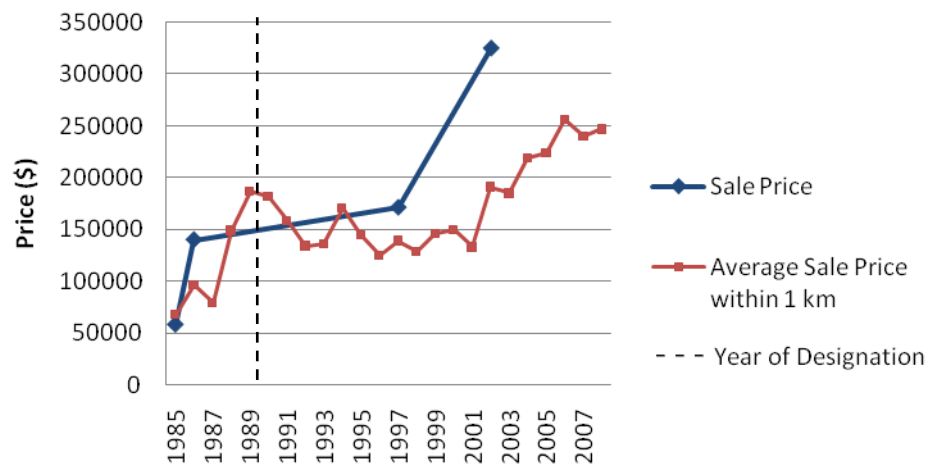
Cobourg - King St. East - Property 6

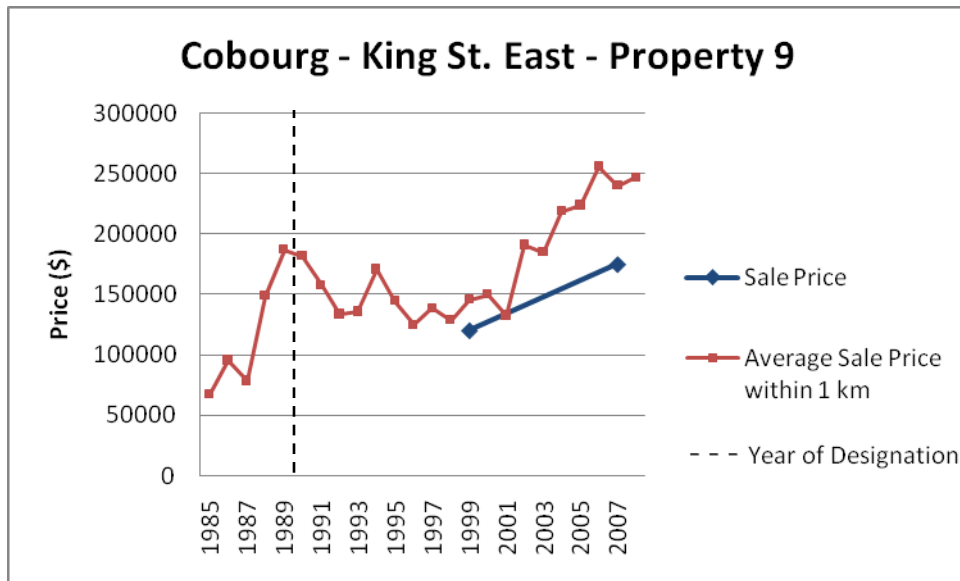


Cobourg - King St. East - Property 7



Cobourg - King St. East - Property 8





Appendix G

Summary of Key Stakeholder Interview

Heritage Conservation District Name: King Street East Heritage Conservation District

Month of Interview: April 2009

Number of People Interviewed: 1

Question	Summary of Answer
1. How are you involved in the HCD?	<ul style="list-style-type: none"> • Was not there when HCD was formed (1) • Planners and Building Department work with MHAC but staff are only resource people (1)
2. How did the HCD come about?	<ul style="list-style-type: none"> • Was not sure how the HCD came about but in the years before the town renovated Victoria Hall and suspects there was enthusiasm carried over from that project (1)
3. In your opinion how has the HCD designation been accepted?	<ul style="list-style-type: none"> • Merchants accept the designation and have pride in King St. (1) • The Victorian atmosphere draws residents and tourists (1) • They realize importance (1)
4. In your experience what are the HCD management processes in place and how do they work?	<ul style="list-style-type: none"> • Applications form at Town Hall (1) • Straight forward process (1) • What they need is better information on paint colours and design ideas to give to people (1)
5. In your experience what is the process for applications for alterations?	<ul style="list-style-type: none"> • MHAC used to meet monthly which meant applicants had to wait longer for approval – HCD Sub-Committee was formed to meet twice per month to consider paint colour and signage only; whole Committee handled structural matters (1) • Now whole MHAC meets twice per month so future of Sub-Committee unsure (1)
6. Is there a communication process set up for the HCD?	<ul style="list-style-type: none"> • There was a mail out a year ago (1) • Many new comers not aware of designation mostly because real estate agents use Title Insurance instead of title searches (1)
7. In your opinion, what are the issues that are unique to the HCD and how have they been managed?	<ul style="list-style-type: none"> • King St is unique in that other local HCD are residential (1)
8. What are similar non designated areas?	<ul style="list-style-type: none"> • n/a
9. Other comments	<ul style="list-style-type: none"> • Staff work with BIA whom thinks they are in favour of district but BIA does advocate for members (1) • Staff is currently arms length from MHAC (1) • Committee is sometimes inconsistent in direction and feels staff should be more involved (1) • Work load means that sometimes there is committee member burn out since they are volunteers (another reason to have more staff involvement) (1) • Real estate professionals relying on Title Insurance means new owners are not properly informed (1)

