New Uses for Old Churches: An Examination of the Effects of Planning Regulations on the Adaptive Reuse of Church Buildings

By

Ermias Amayu

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Executive Summary

Older church buildings are central features of Canadian urban landscapes. These buildings are very important to both religious and secular communities as they have many socio-cultural values with which people associate and because they serve as physical markers of place and focal points for community gatherings. Church buildings are originally built to function specifically as places of worship. However, changes in the demographic make-up and social values of Canadian urban communities have made some of these buildings redundant and inappropriate for their original purposes. As a result, an increasing number of these buildings are now being adaptively reused for other purposes.

The adaptive reuse of old church buildings is by no way a new concept. Over the years, many unused church buildings that were structurally secure have been adapted to fit changed needs or new functions. The adaptive reuse of old church buildings generally involves repurposing these historic buildings for economically viable new uses while at the same time preserving the heritage elements of the buildings. Adaptive reuse therefore offers a creative and sustainable solution for economically revitalizing neighbourhoods and preserving the heritage of old church buildings once they stop functioning as places of worship. However, undertaking a successful adaptive reuse of an old church building is a complex process as it is influenced by several planning policies and regulatory requirements.

The purpose of this report is to explain how the existing planning policy framework, both at the provincial and municipal level, influences the adaptive reuse of old church buildings. This is achieved by examining how clauses within primary policy and regulatory documents create both
opportunities and barriers for developers undertaking adaptive reuse projects. A multiple-case study approach, which consisted of two church adaptive reuse projects in the City of Kingston, was adopted to undertake the study. The two adaptive reuse projects studied were the former Queen Street United Church and the former Congregational Church. The examination of the effects of the planning policy framework was also based on four provincial and municipal documents: the Provincial Policy Statement, the Ontario Heritage Act, the City of Kingston Official Plan and the City of Kingston Downtown and Harbour Zoning Bylaw. Additionally, interviews and discussions were conducted with key informants.

The results of the study are generally consistent with the literature. They indicate that the existing planning policy framework creates both opportunities and barriers in various ways for developers undertaking church adaptive reuse projects. The major opportunity created for developers was the presence of a general policy support for adaptive reuse initiatives both at the provincial and municipal levels. There are several clauses and provisions within the planning documents that support intensification and heritage conservation. Other opportunities that existed for developers were primarily realized through the facilitation of procedural issues that hindered adaptive reuse projects. On the other hand, the major barriers that were identified related to issues such as limited financial incentives for developers and a lack of similar zonings for church buildings in the Zoning Bylaws. The presence of bureaucratic hurdles during project approval by the Heritage Approval Committee and a lack of policies and regulations that explicitly speak to the issues faced by adaptive reuse projects were also identified as barriers.
Based on the findings of the study, four recommendations were made. These recommendations are areas that should be further explored by the municipality to enhance the repurposing process of old unused church buildings.

- The City should take a more proactive role in facilitating church adaptive reuse projects.
- The City should develop new funding initiatives aimed at encouraging adaptive reuse projects.
- The City should streamline the existing Zoning Bylaws and provide more flexibility in meeting zoning requirements.
- The City should develop specific designation criteria.
Chapter One: Introduction

1.1 Context

Change is an inevitable part of the spatial organization of urban areas. As urban areas grow, many elements of the built environment transform to accommodate these changes. The outcomes of this process are clearly reflected in the transformation of old buildings that outlive the original purposes for which they were built. Throughout human history, people have continuously changed the uses of buildings once they become old and inappropriate for their original uses. This process is referred to as adaptive reuse.

Adaptive reuse generally involves developing old historic buildings for economically viable new uses while preserving elements of their original design and character (Cantell, 2005; Johnson, 2004). This phenomenon is increasingly becoming popular in many cities around the world as an important neighbourhood revitalization strategy (Burchell and Listokin, 1981) and as a means for preserving the historic, socio-cultural and architectural values of older buildings. The preservation and reuse of old buildings has numerous economical, environmental and socio-cultural benefits for urban communities. As Jane Jacobs states, it is also almost impossible for cities to have vigorous streets and growing districts without preserving their old buildings (Jacobs, 1961).

Built primarily as grand structures for the congregation of large groups of people, old church buildings have always been part of the landmark features of Canadian cities. Many features of these buildings, such as their distinctive architectural style, spires and crosses, are also highly recognizable elements of the urban environment. In addition to this, these old church buildings
have many religious, historic and cultural values that people associate with. Contemporary changes in the demographic make-up and social values of Canadian urban communities have however resulted in significant impacts on urban churches and their buildings. With the continuous decline in the number of people going to church, many of these historic buildings are increasingly becoming redundant and as a result are being vacated by their congregations who no longer can afford to maintain them. This increasing trend of vacant church buildings seen in the urban core of many Canadian cities has therefore become an issue of concern not only for the congregations owning the buildings but also for municipal governments.

As many Canadian cities are now faced with the dilemma of how to best deal with the problem of vacant church buildings in their cores, adaptive reuse offers a creative and sustainable means for preserving and reusing these buildings. An increasingly growing number of cities are therefore currently adopting and implementing adaptive reuse strategies as an integral part of their overall planning policies to tackle this problem. The implementation of these strategies is however strongly influenced by planning policies and tools that exist to guide and regulate land use development. In Ontario, the planning policy framework, both at the provincial and municipal levels, encourages notions such as intensification and heritage conservation and this in turn influence the adaptive reuse of historic buildings.

1.2 Problem Statement

The adaptive reuse of old inner-city church buildings is by no way a new concept. Over the years, many vacant church buildings have been successfully repurposed for new economically viable uses. As most of these buildings are historically and architecturally significant landmarks
of neighborhoods, adaptively reusing them will help in preserving the buildings. In addition, as old church buildings command high real estate values due to their proximity to city centres, finding new economically feasible uses for them will also assist in economically revitalizing urban cores. The most common conversions of these buildings to date have been to residential units, office spaces, community centres, museums and retail stores.

![Figure 1.1 Location of church buildings in Kingston’s urban core (Source: City of Kingston KMaps)](image)

The City of Kingston has a large stock of old church buildings in its urban core that are currently being used as places of worship by their congregations. However, as the City continues to grow, current demographic trends indicate that a lot of these buildings will become redundant and consequently vacated by their congregations. Adaptive reuse therefore offers the City a unique opportunity for preserving the historic and architectural significance of these buildings while simultaneously tackling the problems associated with vacant buildings. However, the decision to
adaptively reuse these buildings is not easy when compared to other types of buildings. In addition to the common challenges presented by public interest groups and the physical design of these buildings, developers are faced with many legislative and regulatory restrictions that make the successful reuse of older buildings challenging. These legislative barriers primarily arise from stringent regulations that require adaptive reuse projects to comply with planning regulations that are mainly designed to address the issues of new developments. Despite these challenges however, planning policies and initiatives that encourage adaptive reuse also exist both at the provincial and municipal levels. However, very little research (Hackworth and Gullikson, 2013) has been done to examine the effects these policies and regulatory tools have on the adaptive reuse of church buildings.

1.3 Research Question

The main purpose of this report is to determine how the existing planning policy framework influences the adaptive reuse of old church buildings in the City of Kingston. This is achieved by examining how clauses within primary policy and regulatory documents create both opportunities and barriers for developers undertaking adaptive reuse projects. In order to do so, the following research questions are addressed:

1. Are there planning policies and regulations to support the adaptive reuse of old church buildings? If so, what opportunities do they create for developers undertaking adaptive reuse projects?

2. What are the major challenges developers may face as a result of the existing planning policies and regulations when adaptively reusing old church buildings?
1.4 Scope

The findings of the study are based on two adaptive reuse projects situated in the City of Kingston: the former Queen Street United Church and the former Congregational Church. The examination of the effect of planning policy and regulations is limited to the Provincial Policy Statement, the Ontario Heritage Act, the City of Kingston Official Plan and the Downtown and Harbour Zoning Bylaw 96-259. The primary data used for the study was also collected between the months of March and April 2014.

1.5 Organization

The report is divided into five main chapters. Chapter One is an introductory chapter that provides the reader with a general overview of the research. The chapter outlines the context of the research, the problem statement, research questions, and the scope of the study. A review of relevant literature is presented in Chapter Two. The chapter summarizes existing literature on adaptive reuse, church abandonment and reuse and planning regulations that create obstacles for undertaking adaptive reuse projects. Chapter Three is a methodology chapter that outlines the research approach and design employed, the rationale for selecting cases, and the sources of data and the techniques of data collection and analysis utilized. In Chapter Four, the findings from the analysis of the case studies, planning policy framework and key informant interviews are presented. Finally, Chapter Five concludes the report and presents general recommendations.
Chapter Two: Review of Literature

2.1 Adaptive Re-use

The reuse of buildings for new purposes is not a recent phenomenon. Throughout human history, people have constantly changed the uses of buildings as they get old and become inappropriate for the original uses for which they were built. The conversions of the Athena Temple into a church and that of the Rome Theatre into apartments are testaments of how far back in time the reuse of buildings go (de Vries, 1990 cited in Velthuis and Spennemann, 2007). It was however, as a result of increasing environmental concerns in the 1960s and 1970s that the term adaptive reuse first emerged in mainstream architectural parlance (Cantell, 2005). Even though decades have now passed since the term adaptive reuse first emerged, there still appears to be no single clear definition of the term. According to Garstka (2012), a variety of meanings, varying greatly in their degree of complexity, have been attached to the term depending on who defines it and the perspective from which it is defined. It is therefore important to have a clear definition of the term in order to understand the complexities surrounding it.

2.1.1 Adaptive Re-use Defined

In their book, The Adaptive Re-use Handbook, Burchell and Listokin (1981:1) define adaptive reuse as a ‘neighbourhood revitalization strategy which employees a series of linked procedures to: plan for, inventory, acquire, manage and reuse surplus or abandoned real estate.’ This definition however appears to be very broad and fails to capture the key features behind the concept of adaptive reuse. On the contrary, other definitions of adaptive reuse have tended to focus only on specific aspects of the idea such as functionality, economic viability or conservation. For instance, Conejos et al. cited in Garstka (2012:12) describe adaptive reuse
from a solely functional perspective as ‘a significant change to an existing building function when the former function has become obsolete.’ Meanwhile, Johnson (2004:19) takes a more conservation orientated approach on adaptive reuse and defines it as ‘the process by which historic buildings are converted for new modern uses while preserving elements of their original design and character.’ On the other hand, Cantell (2005:2) focuses on the importance of the profitability aspect of the adaptive reuse and defines it as ‘a process by which structurally sound old buildings are developed for economically viable new uses.’

A more comprehensive definition of adaptive reuse, which is adopted for the purpose of this paper, is one proposed by Yung and Chan (2011). They define adaptive reuse as ‘any building work and intervention to change its capacity, function or performance to adjust, reuse or upgrade a building to suit new conditions or requirements’ (Yung and Chan, 2011:353). This definition is important because it acknowledges that adaptive reuse, in addition to preserving the historic significance of buildings, involves making modifications to their structure and function, to make them comply with contemporary standards.

2.1.2 Why Adaptive Reuse

In her book, The Death and Life of Great American Cities, Jane Jacobs emphasizes the importance of preserving old buildings in cities. She explains that “cities need old buildings so badly it is probably impossible for vigorous streets and districts to grow without them” (Jacobs, 1961). Even though the presence of old buildings is important for the vitality of urban areas, negative effects can also be associated with them once their useful life is over and they get abandoned. Cantell (2005) states that old derelict buildings attract crime and as a result can
reduce property values and also discourage investment in a community. Therefore, it is here that adaptive reuse plays an important role. Adaptive reuse can assist in preserving the historic and architectural significance of older buildings while at the same time reducing the number of derelict buildings that exist in communities. In addition to this, the adaptive reuse of older buildings also has many important environmental, economic and social-cultural benefits for communities (Wilson, 2010; Garstka, 2012; Bond, 2011; and Commonwealth of Australia, 2004).

**Environmental Benefits**

Reusing older buildings has significant environmental benefits. These benefits are experienced mainly through the reuse of the buildings’ existing materials and structures (Wilson, 2010). This contributes to the environmental sustainability of adaptive reuse projects as it allows for the retention of the “embodied energy” existing in older buildings (Commonwealth of Australia, 2004). Since older buildings are made with materials that have longer useful lives, these materials can be reused unlike those used in current construction projects (Langston et al., 2007). This therefore means that adaptively reusing older buildings requires less energy and has fewer emissions unlike new building developments.

Another important environmental benefit of adaptive reuse is its contribution to Smart Growth initiatives. The reuse of existing buildings preserves the natural environment by reducing the need for prime agricultural and natural lands for new construction purposes (Bond, 2011). In addition, adaptive reuse also allows for the use of already existing public infrastructure such as sewer, water and electric lines (Wilson 2010; Bond, 2011). Finally, Bullen and Love (2010) cited
in Garstka (2012) claim that the adaptive reuse of buildings is better for the environment as it reduces the amount of contaminants that are released during the demolition of buildings.

**Economic Benefits**

The economic benefits realized from reusing older buildings are probably the most debated of all the benefits of adaptive reuse. As Bullen and Love (2009) state, building owners and developers usually regard the adaptive reuse of older buildings as uneconomic. This is mainly due to the perceived problems related with health and safety, maintenance costs and building layouts. In addition, Bullen and Love (2011) also state that the idea of reusing buildings is seen as an unfeasible option by developers due to the planning and building restriction associated with historic buildings. Thus, many historic buildings have as a result of these reasons been demolished. On the other hand however, many scholars also point out the numerous economic benefits gained from adaptively reuse older buildings.

The economic benefits of reusing older buildings are experienced both by the community and the developer. Bond (2011) explains that the preservation and adaptive reuse of a historic building in a community adds economic value to the community by acting as an attractant of other investment projects. She also argues that adaptive reuse projects create more local jobs when compared with new construction projects as most of the work costs go to labour. At the city and regional level, adaptive reuse projects can also positively contribute to the economy by increasing tax revenues and by attracting tourism interests (Bond, 2011). Reusing historic buildings also has economic benefits for developers and property owners since reusing buildings is usually cheaper than demolishing and rebuilding (Bullen and Love, 2009; Shipley et al., 2006).
Finally, Garstka (2012) points out that the reduced construction time required for adaptive reuse projects, when compared to demolishing and rebuilding the same building size, also has significant financial implications for developers.

**Socio-Cultural**

The historic significance of older buildings can be maintained and restored through their adaptive reuse (Commonwealth of Australia, 2004). This, in addition to ensuring the survival of the buildings, has long-term social and cultural benefits for the communities in which they are situated. The social benefits of adaptive reuse come primarily through its potential for reducing the quantity of abandoned buildings that attract crime. Bond (2011) claims that the adaptive reuse of old buildings can socially revitalize neighbourhoods by reversing decay unlike demolition and new build which only tend to move the problems elsewhere. Adaptive reuse projects can also offer other social functions for communities by serving as new focal points (Johnson, 2004). Furthermore, successful projects can play important roles in creating positive images for impoverished communities associated with negative connotations (Sampson, 2009 cited in Garstka, 2012).

Adaptive reuse also contributes to the culture of a society by preserving the heritage and cultural values of older buildings. These reused buildings can “retain attractive streetscapes, add character, provide status and image … and add to a sense of community” (Langston et al., 2007:4). Finally, Velthuis and Spennemann (2007) claim that retaining older buildings is also important for the well-being of communities as they are rooted deeply into the history of their communities.
2.2 Abandonment and Adaptive Reuse of Churches

Church buildings are centrepieces of neighborhoods as they have numerous values with which people associate themselves with (Lueg, 2011; and Johnson, 2004). Besides serving as places of worship, these buildings serve as focal points for community gatherings, physical markers of a sense of place and as heritage and cultural symbols (Johnson, 2004; and Ahn, 2007). However, with the decline in the number of churchgoers in the western world, these buildings are now being abandoned.

A number of factors have contributed to the redundancy and abandonment of church buildings. Changes in the demographic make-up of urban centres is thought to have had the greatest impact on inner-city churches and their buildings. These changes, caused mainly due to the movement of existing church members to the suburbs, has resulted in a drop in church memberships (Lueg, 2011; Johnson, 2004; Taguiam, 2013; Velthuis and Spennemann, 2007). Taguiam (2013) notes that the ageing of congregations in recent years has also been one of the main reasons for the abandonment of many church buildings. Other factors such as a shift in the public’s perception of churches due to different scandals and the reduction in the number of young people turning to religion are also stated as contributing factors for the abandonment of church buildings (Lueg, 2011; Velthuis and Spennemann, 2007). This decrease in membership has resulted in significant decreases in the income of churches and, coupled with the high cost required for maintaining these old buildings, has forced many congregations to abandon their churches or convert them for other uses.
As church buildings are important neighbourhood landmarks, finding an economically feasible use for abandoned churches helps to both preserve these historic buildings and to economically revitalize the neighbourhoods in which they are situated (Johnson, 2004). Over the years, there have been many reuse options available for abandoned church buildings. The most common conversions of these buildings have been to residential units, offices, community centres, museums and retail stores. Velthuis and Spennemann (2007) note that of the various reuse options available for redundant churches, reuse for residential purposes is the most popular type.

As Kingston continues to grow, the City will start to see an increasingly growing number of its historic church buildings converted to other uses. However, the decision to adaptively reuse church buildings is not easy when compared to other types of buildings. This is mainly because these buildings are held in high regards by the public due to reasons such as historicity, representation of morals and aesthetic values (Garstka, 2012). The physical design of church buildings also makes them difficult buildings to convert to new uses (Johnson, 2004). Apart from these social and structural obstacles for adaptively reusing old church buildings, compliance with regulatory requirements will be a challenge to their conversion.

2.3 Legislative Obstacles for Adaptive Reuse

The adaptive reuse of older buildings with historic significance is a complex process that poses numerous challenges for developers. In addition to the common challenges presented by public interest groups and the physical design of the buildings, developers are faced with many legislative obstacles that work against the successful adaptive reuse of older buildings such as historic churches. These obstacles arise from stringent local government regulations that require
adaptive reuse projects to comply with the same planning and building standards designed primarily for new buildings. Ironically, many local governments also still do not have separate sets of regulations for new construction and for building rehabilitation (Kiley, 2004). Thus, inadvertently, this lack of flexibility on the part of local government regulations can discourage developers from reusing older buildings as complying with these regulations can undermine the feasibility and viability of the projects. Some of the major regulatory barriers that should therefore be considered when adaptively reusing older buildings include zoning requirements and heritage preservation ordinances.

2.3.1 Zoning Regulations

Local government zoning regulations usually pose legislative barriers to the adaptive reuse of older historic buildings. Traditionally, zoning codes have allowed municipalities to control development and promote public health and safety through the segregation of different land uses into separate zoning districts (Cantell, 2005). This has been based largely on the assumption that urban land uses should be separated in order to create healthy communities. However, these underlying assumptions that are still reflected in most municipal zoning bylaws make it difficult to adaptively reuse older buildings such as churches. This is because the conversion of these structures usually involves a change in use that might not be allowed in the zoning district. As Mirza-Avakyan (2013) notes, when a former church building changes use, it will be subject to a rezoning process and will have to go through a review process as part of the development. In addition to regulating the types of uses allowed in a specific zoning district, zoning laws also have provisions that set minimum standards for each zoning area such as floor-area ratios, building heights and setbacks, parking requirements and various other restrictions. Complying
with these minimum requirements usually presents regulatory burdens on developers working on adaptive reuse projects, as they are usually impractical to meet. For instance, in many cities today, the same parking supply requirements are still applied to new construction and adaptive reuse projects, even if in most cases the latter could be in an urban context where people choose to rely less on private automobiles and use public transit more (Johnson, 2004). Therefore, in order to obtain variances for these requirements, developers in most cases have to go through lengthy and costly administrative processes.

2.3.2 Heritage Preservation Ordinances

The designation of older buildings as local historic landmarks or as contributing to a local historic district is an important mechanism for preserving these buildings (Cantell, 2005). These designations prevent private owners of properties with historical significance from demolishing their own buildings at will. However, these same designations designed for protecting and preserving these buildings can on the other hand hinder their preservation. As Johnson (2004) notes, the existence of heritage designations on these buildings influences the kind of adaptive reuse that can be undertaken and the level of changes that can be made to the structures. Complying with these requirements that are aimed at retaining the historic fabric of these buildings can however present regulatory obstacles for developers interested in adaptively reusing older buildings such as historic churches.
Chapter Three: Methodology

3.1 Research Approach and Design

The review of literature indicated that planning regulations in most municipalities present certain challenges for projects aimed at adaptively reusing older buildings as they are primarily designed to address the issues of new constructions. However, it also showed that opportunities do exist as some municipalities now have planning regulations designed specifically to deal with the situations faced by adaptive reuse projects. In addition, the review of literature revealed that the main regulatory instruments that affect these projects are zoning restrictions and heritage development regulations.

The research approach for this study therefore builds upon these observations. It is generally aimed at examining the policies and regulations that influence the adaptive reuse of older buildings in the City of Kingston. Centered on the main research questions, the study’s methodology allows for the examination of the opportunities and barriers created by existing planning policies and regulations. Specifically, the research design seeks for information on how planning policies, zoning restrictions and heritage development regulations affect the adaptive reuse of old church buildings.

Given the nature of the research and the main research questions it addresses, a case study approach was adopted to undertake the study. This approach, as described by Yin (1984:13), is most appropriate when conducting research “when how or why questions are being posed, when the investigator has little control over events, and when the focus is on a contemporary phenomenon within some real-life context.” This study is therefore particularly suitable for a
case study design as the study’s main purpose is to understand how contemporary planning regulations beyond the control of the researcher affect the adaptive reuse process of older church buildings. In addition, as case study methodology is ideal when a holistic, in-depth inquiry is needed (Tellis, 1997), its adoption as the study’s research method will help in undertaking a detailed analysis of the complex issues surrounding planning regulations and the adaptive reuse of old church building.

The research process started with a thorough review of relevant literature which helped to select an appropriate research design for the study. It also helped in establishing a theoretical framework to guide the study and for the identification of cases to be studied. The review of literature was followed by the preparation of interview questions and the collection of necessary data using different techniques. The data collected was then analyzed to identify the main opportunities and barriers presented by the existing planning policy framework. Finally, policy recommendations were made based on the study’s findings. The research protocol at the end of this section visually illustrates the research process followed in the study.

### 3.2 Case Study Selection

The study relies on a multiple-case design in which multiple cases are selected as literal replications with the expectation that they would predict similar results (Yin, 2009). The selection of multiple cases, as Yin points out, increases the robustness of the study’s findings as it allows for the collection of more convincing evidence. For the purpose of this study therefore, two adaptive reuse church projects were identified and examined as units of analysis. The two
case studies examined were the former Queen Street United Church and the former Congregational Church, both of which are located in downtown Kingston.

The two cases were carefully selected to enhance the quality of information collected for analysis. The former Queen Street United Church was selected as a case study because it reflects an ongoing adaptive reuse project whereas the second case study illustrates a successfully repurposed church building that is currently operational. For both cases studies, a background on the church building and a description of the projects’ development is provided. In addition to this, a general description of the neighborhoods in which the churches are located such as the surrounding land uses and the regulatory controls and planning policies affecting the properties are provided. This helps in telling the story of each case study and also provides context for the overall study.

3.3 Data Sources and Collection Techniques

As a qualitative research approach, a case study involves using multiple sources and techniques of data collection to examine cases in detail (Bowen, 2009). This enhances the credibility of the research findings and its conclusions as it enables for the triangulation of data. This triangulation of data is usually seen as a process by which multiple perceptions are used to clarify the meaning and repeatability of an observation (Stake, 1994). Tellis (1997) also points out that in case studies, these multiple sources and techniques of data collection increase the internal validity of the study as well as its external validity and reliability. Usually, the data collection methods used in case studies consist of interviews, observations and document analysis. In this study, data was primarily collected using both interview and document review techniques. In-depth interviews
with key informants were used to collect primary data for the research whereas secondary data was collected through a review of planning documents. This helped in obtaining both in-depth information and multiple insights of the issue being studied.

### 3.3.1 Interviews

Interviewing is an important method for collecting data in case study research. The goal of interviewing, as Gill et al. (2008) explain, is to explore different views and experiences on specific matters in order to obtain a deeper understanding of the issue being studied. This data collection method was particularly appropriate for the study as the purpose of the study was to get an in-depth understanding of the challenges and the opportunities created by existing planning regulations. To achieve this, in-person interviews and discussions were conducted with four key informants who were experienced on the issue being studied and who had first-hand knowledge of the selected case studies. In order to enhance the credibility of the findings and present a balanced perspective, the interviewees were selected from both the private and public sectors (Rubin and Rubin, 2005). Accordingly, discussions were held with one heritage and two policy planners from the City’s Planning and Development department and a professional from a private consulting firm that had worked on one of the case study projects.

There are three main types of interviews: structured, semi-structured and unstructured. For this study, semi-structured interviews were used as their flexibility allows researchers to diverge from the main interview questions in order to pursue new ideas that come up during the interview (Gill et al., 2008). As semi-structured interviews consist of several key questions that help to define the areas to be explored, both close- and open-ended questions were developed
and used to facilitate the interviews (Hay, 2010). These questions focused mainly on the effects planning policies, zoning requirements and heritage regulations have on the adaptive reuse process of old buildings. Refer to Appendix B for the interview questions. The interviews were both digitally recorded and manually transcribed to ensure that the accuracy of the responses is reflected in the report. Prior to the interviews, the participants were also assured that the confidentiality of the information gathered during the interview would be protected.

### 3.3.2 Document Review

A review of relevant provincial and municipal planning documents was used as the main method for collecting secondary data. As Bowen (2009) mentions, this method involves a systematic review and evaluation of documents and is used in combination with other qualitative research methods. In this study, an analysis of the planning documents was undertaken parallel to the key informant interviews to get an in-depth understanding of the effects of the planning policy framework. Apart from providing context for the research, the information collected from the documents was particularly useful for corroborating the information gathered from the interviews. The main documents analyzed included the Provincial Policy Statement, the Ontario Heritage Act, the City of Kingston Official Plan and the City of Kingston Downtown and Harbour Zoning By-Law 96-259.

The Official Plan was reviewed to analyze the City’s policy direction with regards to the adaptive reuse of old buildings. The Zoning Bylaw was also reviewed to assess the effects land use development restrictions such as land use compatibility, development density, building setback and parking have on the conversion of old church buildings to other uses. In addition, the
Provincial Policy Statement and the Ontario Heritage Act were reviewed to understand how provincial policies influence adaptive reuse projects at the municipal level. A review of other secondary data sources such as planning reports, heritage impact assessments and newspaper and website articles were also used to collect background information on the case studies. Secondary data obtained from books and peer-reviewed journal articles was also used for the review of literature.

3.4 Data Analysis

As the explicit purpose of this study is descriptive in nature, the general strategy followed to guide the data analysis involved both developing a case description and relying on theoretical propositions (Yin, 2009). The information gathered from the review of documents and interviews was analyzed in three stages. The first stage involved developing a case description for the case study projects from secondary data sources. This helped to provide context for the overall analysis. The second stage of the analysis comprised of a content analysis of the data obtained from the policy and regulatory documents. This involved organizing the information obtained from the planning documents into broad themes that related to the study’s research question (Bowen, 2009). Within all of the documents, the information was organized into three broad areas which included general policies, zoning regulations, and heritage designations. This helped to manage the information collected from the policy documents and regulations and to identify what planning policies exist with regards to adaptive reuse. From this, a framework that describes the policy direction with regards to adaptive reuse and the planning policies and regulations that affect adaptive reuse efforts was established. The third stage of the analysis involved a qualitative analysis of the interview data. This was conducted to identify common
characteristics between the cases and to describe how the existing policies and regulations affected the adaptive reuse of old church buildings.
Chapter Four: Analysis

4.1 Case Studies

This section of the analysis provides a general overview of the two adaptive reuse projects used as case studies for this research. The history of the adaptive reuse projects (ongoing and completed) as well as a land use description of the neighborhoods in which they are situated is presented to provide context for the overall study. In addition, the regulatory controls affecting these projects are presented in this section to lay the foundation for the policy analysis presented in the next two sections. The two case studies analyzed are the former Queen Street United Church and the former Congregational Church situated in the City of Kingston.

4.1.1 Former Queen Street United Church

History

The former Queen Street United Church is located at the corner of Queen and Clergy Streets. The design and construction of the first church building on this site started in 1863 and was completed in December 1864 on a lot donated by John Bredin who was one of the first mayors of Kingston. At first, the church started as the Queen Street Wesleyan Church, a Methodist Church that was originally part of the Sydenham Street Wesleyan Church. However, the church got its current name, Queen Street United Church, only after 1925 when the United Church was formed as a union of the Methodist, Congregationalist and Presbyterian churches (Queen Street United Church, 1975).
Heritage Significance and Physical Transformation

The former Queen Street United Church has a long history in Kingston and is a municipally designated heritage building under section 29 of the Ontario Heritage Act. The building has gone through several physical transformations throughout its lifetime. This is mainly because the church had a long history of fires. The original church was designed in 1863 by John Power and was considered at the time to be the best laid out church in Kingston (Ibid).

According to McKendry (1986), the design of the original church was “a rectangular plan of four bays over a high basement with a simple gable roof.” However, the original church was partially burned in 1884 and was restored by another architect by the name William Coverdale Jr.

The restoration of the church burnt in 1884 did not last long as the church was totally destroyed just two years later. This time however, the church decided to build a new building with a new design. The reconstruction of the new church was carried out in 1886 by S.R. Badgeley (City of Kingston, 1977). Unlike the original church building, the design of the new building was Gothic Revival in style. The new church also featured an asymmetrically placed rectangular tower oriented to the corner of Queen and Clergy Streets and its main entrance was oriented towards Clergy Street (McKendry, 1986). An article written on May 1887 in the British Whig described...
the new church building as “a handsome edifice on the site of the Second Methodist Church and one that is not only an ornament to the city and a credit to the congregation but a magnificent monument to the latter … the building is English, Gothic in style and built of rough faced limestone” (Queen Street United Church, 1975).

Figure 4.2 Image of Queen Street United Church building after the fire of 1886

Source: Queen Street United Church (1964)

The church building that currently stands on the corner of Queen and Clergy Streets was reconstructed in 1920 after it was destroyed by fire in 1919. It is also Gothic in style and was reconstructed by Joseph Power according to the design of the 1886 building (City of Kingston, 1977). Since then, most of the changes that have been made to the physical structure of the building involved only minor alterations to its interior. For instance, in 1939 the church’s auditorium ceiling was lowered and the pews were changed as part of an interior renovation (Queen Street United Church, 1975).
At present, BPE Development has submitted plans to repurpose the church building for residential use. Figure 1 shows a partial rendering of the proposed repurposed church building. The plan for this adaptive reuse project sees to enlarge the church lot by merging several properties together. The church building will also be renovated and enlarged through the construction of an addition to the existing structure. This project, called The Tower: Clergy on Queen, will see a total of 16 residential units developed within the church building and the new addition. Other structures such as a 4-storey 14-unit condominium and an underground parking garage will also be constructed on the enlarged lot as part of the development. Apart from the residential units, the project also features commercial uses on the first floor and on portions of the church’s basement (City of Kingston, 2013).
Surrounding Land Uses and Regulatory Controls

Queen Street United is located in the northwest part of downtown Kingston. The existing church building sits at the corner of Queen and Clergy streets and is surrounded predominantly by residential land uses comprised of a mix of housing types. Different land uses including a vacant commercial land and a church building are also found in the surrounding area. One block to the south of the project on Princess Street, there are a variety of different

Figure 4.5 Satellite view of the neighborhood (Source: Google Maps)
commercial land uses predominantly consisting of local retail and service shops.

The project falls under the regulatory control of two zoning by-laws: the City of Kingston Downtown and Harbour Zoning By-Law 96-259 and the Restricted Area Zoning By-law 8499. The church building is designated ‘Central Business System (C1) Zone’ whereas the other properties fronting onto Colborne and Clergy streets are designated ‘Residential’. The project proposes lot mergers that will see three lots merged in title with the Church and rezoned from ‘Residential’ to ‘Central Business System’. A rezoning of the other lots is also proposed to accommodate the new development. The church property is specifically zoned Neighbourhood Fringe Commercial (C1-1) in the City of Kingston Downtown and Harbour Zoning By-Law 96-259. This zone permits for a wide range of uses including Commercial, Mixed Commercial / Residential Development and Non-Commercial. The maximum building height permitted for buildings or structures is 3 storeys which should not exceed 12.75 metres. Other zoning regulations that apply to this zone also include a maximum density of 123 residential units per net hectare, minimum amenity area requirements and minimum off-street parking space requirements (1 per residential unit and a 1.2 per 100 m² gross floor area of retail).

4.1.2 Former Congregational Church

History

The former Congregational Church is also referred to as the former Masonic Temple. The first building on this site was a small frame church that was built around 1822 and used by the Wesleyan Methodist Church. This building was later sold to the Congregationalists in 1850 who demolished it and built their own church on the site (City of Kingston, 1980). The history of the
The building that currently exists on this site dates back to 1864 – 1865 when it was constructed to be a house of worship for the First Congregational Church. After being used for many decades as a place of worship, the church was closed in 1922 and was sold to the Masons in 1923 (Mika and Mika, 1989). The building was then sold again by the Masons in 2002 and is now privately owned.

**Heritage Significance and Physical Transformation**

The former Congregational Church is a municipally designated heritage building under section 29 of the Ontario Heritage Act. In fact, the building has been an architecturally and historically designated building since 1984 (Mckendry, 2003). The significance of this building greatly lies in its remarkable design as it is considered to be one of the finest Gothic structures that still remain in Canada (Mika and Mika, 1989). This former church building was originally designed in 1864 by John Power but since then several changes have been made to the original building. In 1884, the church building was enlarged through the addition of the Church Hall (City of Kingston, 1980).

Figure 4.6 Original design by John Power (McKendry, 1995)
Like most other buildings of its time, fire destroyed the church’s interior and caused serious damage to the new Church Hall in 1891 (Mckendry, 2003). The building was then restored and further enlarged with transepts according to the plans of J.B. Reid (City of Kingston, 1980). Apart from these structural changes, the function of the building has also changed throughout its lifetime. After being sold to the Masons, the church served as a Masonic Temple for about eight decades. Its nave functioned as a ritual room and the Church Hall served as a banqueting room (Mckendry, 2003). The building was sold by the Masons in 2002 and has since been repurposed for different uses. Currently the building functions as a day care centre run by Kids and Company.

Figure 4.7 Present image of the Former Congregational Church

**Surrounding Land Uses and Regulatory Controls**

The former Congregational Church is situated in downtown Kingston. The building sits at the northwestern corner of Johnson and Wellington streets and is immediately surrounded by major
landmarks. Saint George’s Cathedral, which is a designated heritage building, is located to the South of the building on Wellington Street. The Kingston Frontenac Public Library’s central branch and Kingston’s main Post Office are also found immediately to the west and east of the building respectively. In addition, City Hall, Confederation Park and Kingston’s marina are also located in very close proximity. The surrounding area of this adaptive reuse project is also comprised of a variety of different land uses. Institutional and commercial uses including banks, offices, retail stores and coffee shops are located a few blocks to the east in the heart of Kingston’s downtown. On the western side, residential land use, consisting of different housing types, is the predominant land use type. The southern and northern sides of the project also consist of a mixture of different land use types.

The project is situated within the ‘Downtown and Harbour Special Policy Area’ identified in the City of Kingston Official Plan. The Official Plan encourages a broad mix of uses in this area including “the widest range of commercial use, as well as civic, institutional, open space, recreation and higher density residential use provided that such uses are supportive of the
vitality, human scale, pedestrian activity, historic fabric and function of this Centre” (City of
Kingston, 2009). Properties that are located in the special policy area fall under the regulatory
control of the City of Kingston Downtown and Harbour Zoning By-Law 96-259. The building is
designated ‘Central Business System (C1) Zone’. The specific zone in By-Law 96-259 that
applies to the project is ‘Heritage Commercial (C1-3)’. This zone permits for a wide range of
commercial uses including Day Care Centres. No minimum off-street parking space
requirements apply to Day Care Centres in this zone. All developments in this zone should also
give regard to the recommendations of the Downtown and Harbour Area Architectural
4.2 Policy Framework

There is no single set of planning policies both at the provincial and municipal level that specifically set regulations for the adaptive reuse of older church buildings. Nevertheless, there are a number of policies and bylaws that influence the development and repurposing of these buildings. At the provincial level, the Provincial Policy Statement and the Ontario Heritage Act set the basic policy framework that provides direction on matters related to land use development and the reuse of older heritage buildings. Meanwhile, the City of Kingston Official Plan and the City of Kingston Zoning Bylaws set the policy and regulatory foundations that influence the adaptive reuse of older buildings at the municipal level. As most of these older church buildings are also designated heritage buildings, by-laws such as the Procedural Bylaw for Heritage and other development guidelines also influence adaptive reuse.

The provincial and municipal policy documents do not set specific regulations for the reuse of church buildings. However, they affect the adaptive reuse process of buildings through reinforcing notions such as intensification, heritage conservation, and conformity with existing uses and other regulatory specifications. The following section provides a summary of the key policy documents that were reviewed and the policies and regulations within them that influence adaptive reuse projects. For the provincial policies, both the Provincial Policy Statement and the Ontario Heritage Act were analyzed. With regards to municipal policies and bylaws, the City of Kingston Official Plan and the City of Kingston Downtown and Harbor Zoning Bylaw are discussed. This helps to understand how the adaptive reuse of older church buildings can be influenced by existing planning policies and regulations.
4.2.1 Provincial Policy Context

I. Provincial Policy Statement

Ontario’s Provincial Policy Statement (PPS) is a key component of the province’s land use planning system. Issued under the authority of the Planning Act, the PPS provides policy direction on matters of provincial interest related to land use and development. It also sets the necessary foundation for regulating the development and use of land in the province. The stated objective of the PPS is to provide for appropriate development while protecting resources of provincial interest, public health and safety, and the quality of the natural environment (Ministry of Municipal Affairs and Housing, 2005). In doing so, the PPS contributes to a more effective and efficient land use planning system that, apart from other things, ensures the protection of the province’s built heritage resources. The fundamental principles set out in the PPS therefore apply to any land use planning undertaken by municipalities in Ontario.

The major policy areas included in the PPS are around building strong communities, resource management, and public health and safety. Though the term ‘adaptive reuse’ is not directly mentioned in these policy areas of the PPS, its policies have been designed to include a number of elements that are intended to facilitate the conversion and reuse of older buildings. Adaptive reuse projects are mainly influenced by the PPS through its support for two key elements: compact development through intensification and conservation of built heritage.

Intensification in the PPS is defined as the ‘development of a property, site or area at a higher density than currently exists through redevelopment, development of vacant and/or underutilized lots, infill development and expansion or conversion of existing buildings’ (Ibid). Through
intensification, the PPS therefore reinforces the importance of converting existing buildings for other uses, or in other words, the importance of adaptively reusing existing buildings. Policies in the PPS require planning authorities to undertaken intensification within urban areas by establishing and implementing minimum targets for intensification and redevelopment. More specifically, policy 1.1.3.3 of the PPS states that:

Planning authorities shall identify and promote opportunities for intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.

The PPS also recognizes the importance of conserving heritage resources for Ontario’s prosperity. Specific to built heritage, policy 2.6.1 of the PPS requires planning authorities to conserve significant built heritage resources. The PPS also allows municipalities to undertake mitigative measures and / or alternative development approaches, with the goal of conserving the heritage attributes of protected heritage properties that could be affected by adjacent development or site alteration. With regards to alterations, policy 2.6.3 states that:

Development and site alteration may be permitted on adjacent lands to protected heritage property where the proposed development and site alteration has been evaluated and it has been demonstrated that the heritage attributes of the protected heritage property will be conserved.
II. Ontario Heritage Act (OHA)

While the PPS provides policy directions for land use and development, the Ontario Heritage Act provides the primary legislative framework for protecting and conserving heritage resources in the province. The Act was introduced in 1975 to give the provincial government and municipalities the authority to protect properties of heritage value and archaeological resources. Amendments were later made to the Act in 2002 and 2005 to reinforce and improve its provisions, particularly those related to built heritage. The changes give the province and municipalities powers to regulate alterations made to heritage buildings. The provisions also enable municipalities to stop or delay the demolition of heritage buildings (Ministry of Tourism, Culture and Sport, 1990). These provisions therefore influence the adaptive reuse of older church buildings in the province since many of them are designated heritage buildings. However, similar to the PPS, there is no direct mentioning of the term adaptive reuse in the Act.

Part IV of the OHA enables municipal councils to pass bylaws to formally designate individual properties of cultural heritage value or interest. This designation enables municipalities to manage changes or alterations made to or adjacent to heritage designated properties and to also enforce property maintenance standards. Making alterations to designated properties is specifically addressed by section 33 of the Act. Clause 1 of this section states that:

No owner of property designated under section 29 shall alter the property or permit the alteration of the property if the alteration is likely to affect the property’s heritage attributes, as set out in the description of the property’s heritage attributes that was required to be served and registered under subsection 29 (6) or (14), as the case may
be, unless the owner applies to the council of the municipality in which the property is situate and receives consent in writing to the alteration.

Meanwhile section 34 (1) of the Act restricts the demolition or removal of heritage buildings. It states that:

No owner of property designated under section 29 shall demolish or remove a building or structure on the property or permit the demolition or removal of a building or structure on the property unless the owner applies to the council of the municipality in which the property is situate and receives consent in writing to the demolition or removal.

Other provisions of the Act that affect the adaptive reuse process include section 35.3(1) which allows municipalities to prescribe minimum standards for the maintenance of designated properties. In addition, sections 37(1) and 39(1) enable municipalities to pass bylaws providing for the entering into of heritage easements to protect properties of cultural heritage value and to provide grants and loans for undertaking appropriate alterations to these properties respectively.

4.2.2 Municipal Policy Context

I. City of Kingston Official Plan

In accordance with Ontario’s planning system, Official Plans are important means by which municipalities protect provincial policy interests. Section 4.5 of the PPS requires municipalities to have Official Plans that provide clear, reasonable and attainable policies to protect provincial interests. Official Plans also reflect a municipality’s vision for growth and they set out goals and
policies for land use and development. Likewise, the City of Kingston Official Plan reflects the City’s vision for the future and the policy framework established by the province. This policy document sets out the City’s land use planning goals and the policies that guide physical development and redevelopment, protect natural and cultural heritage and manage resources and necessary supporting infrastructure (City of Kingston, 2009). With regards to the adaptive reuse of older buildings in the City, there are also a number of relevant policies in Section 2 of the Official Plan that influence the process. The section below provides a summary of the City’s policy direction (policies referenced in brackets) as they relate to adaptive reuse in general and to the case study projects looked at in this study specifically.

2.1 Sustainable Development

The goal as stated in the Official Plan is “to protect, conserve, and strategically deploy the natural, cultural and built resources of the City in a manner that promotes compatibility between different functions; …”. Policies aimed at achieving this include:

- **Most growth will occur within the Urban Boundary where development will be directed to achieve greater sustainability (2.1.2).**

- **The City promotes the development of mixed use buildings that contain commercial and office uses on at least the ground floor and residential units on upper floors as part of its sustainability and intensification program along the Princess Street Corridor and its Centres (2.1.4).**

- **In the design and operation of City buildings, land, equipment and facilities, the City will seek to lead by example through initiatives that promote sustainability, including but not limited to: adaptive re-use and promotion of cultural heritage resources (2.1.8. g).**
2.3 Principles of Growth

The stated policy direction is to encourage intensification by redeveloping the existing built area through compatible infill development that respects cultural heritage resources, existing housing stock, and the stability of neighbourhoods. Intensification is directed towards mixed land use development areas and mixed use buildings. Policies aimed at achieving this include:

- **The City intends to increase the overall net residential density within the Urban Boundary through compatible and complementary infill, the appropriate redevelopment of under-utilized and brownfield sites, and the targeting of a density increase for large-scale vacant land development in the Princess Street Corridor and Centres (2.3.2).**

- **Cultural heritage resources will continue to be valued and conserved as part of the City’s defining character, quality of life, and as an economic resource that contributes to tourism in both the urban and rural portions of the City (2.3.7).**

2.4 Phasing of Growth

The stated goal in the Official Plan is to ensure that the City develops in a compact and orderly manner within its ability to support a full range of utilities, infrastructure and social services. Policies aimed at achieving this include:

- **It is the intent of the City to increase urban residential density by a minimum of nine percent (9%) from the current overall density of 21.6 units per hectare within the Urban Boundary to an overall minimum density of 23.5 residential units per net hectare by the horizon year of 2026. The residential intensification target is to be achieved through larger scale developments, the expansion or conversion of existing buildings, and the**
redevelopment of vacant, underutilized, or brownfield sites and infill developments (2.4.5).

2.6 Stable Areas and Areas in Transition

- It is the intent of this Plan to promote development and adaptive re-use opportunities in areas where change is desired while protecting stable areas from incompatible development or types of development and rates of change that may be destabilizing (2.6.1).

7. Cultural Heritage Resources

Section 7 of the Official Plan deals with cultural heritage resources, including protected heritage properties, built heritage resources, cultural heritage landscapes, and archaeological resources. Policies in this section are aimed at conserving and enhancing heritage resources and in turn also influence the adaptive reuse of heritage buildings. These policies include:

- The City will acquire heritage easements, and enter into development agreements for the conservation of cultural heritage resources where appropriate (7.1.4).
- The City may require that a heritage impact statement be prepared by a qualified person to the satisfaction of the City for any development proposal, including a secondary plan, which has the potential to impact a cultural heritage resource ... A heritage impact statement may be required where construction, alteration, demolition, or addition to a property located within a heritage conservation district or heritage area is proposed (7.1.7).
- The City may permit development and site alteration on adjacent lands to a protected heritage property where the proposed development and site alteration has been
evaluated, and it has been demonstrated through the preparation of a heritage impact statement that the heritage attributes of the protected heritage property will be conserved (7.2.5).

9.5 Bylaws

• As established by the Planning Act, the City may enter into an agreement with any landowner or building occupant to exempt such owner or occupant from the provision of parking required by a zoning by-law in return for the payment of money and such agreement may be registered on title, and considered a tax under the Municipal Act (9.5.11).

• The City may approve a by-law authorizing an increase in height or density beyond that allowed in the zoning by-law pursuant to the Planning Act, in return for facilities, services or matters benefiting the public, including the following: conserving cultural heritage resources (9.5.25 h).

II. City of Kingston Zoning Bylaws

Zoning bylaws are one of the most important regulatory tools by which municipalities implement the objectives and policies of the Official Plan. Provisions in zoning bylaws enable municipalities to regulate land use and development within their boundaries. These provisions set minimum or maximum standards to regulate development density, parking requirements and other form-related standards such as building heights, setbacks and lot sizes. The set standards affect both new development projects and those aimed at reusing existing buildings.

The City of Kingston has five principal zoning bylaws to regulate land use that apply to varying geographical areas: City of Kingston Restricted Area Bylaw 8499; Downtown and Harbour Bylaw 96-259; Kingston Township Restricted Area By-law 76-26; Cataraqui North Bylaw 97-
102; and Pittsburgh Township Restricted Area Bylaw 32-74. However, as most of the buildings with historic and heritage value and a potential for reuse are located in the downtown, this analysis is undertaken only with reference to the zoning provisions that apply to the Downtown and Harbour Zoning Bylaw. This bylaw was adopted in 1996 and is based on a form-based zoning format. The bylaw regulates the use of land in the Downtown and Harbour areas of the City.

The bylaw defines building conversion as ‘the alteration or change of use of an existing building or structure, or a portion thereof, to another use.’ Section 5 of the bylaw provides general provisions that cover matters such as amenity area and parking requirements (City of Kingston, 1996). These provisions apply to more than one zone in the zoning bylaw. The general provisions (referenced in brackets) as they relate to building conversions in general and to the case studies specifically are summarized in the following section.

5.5 Amenity Area

- Section 5.5.1 sets minimum amenity area requirements for each residential unit developed based on the type of units. This ranges from a minimum of 10m² for a bachelor and one bedroom unit up to 85m² for units with four bedrooms and over.
- Except for a senior citizen apartment dwelling or where otherwise provided herein, where a dwelling contains ten (10) or more apartment dwellings, an equipped children’s play area shall be provided at a rate of 2.5 square metres per residential unit. The minimum size of such equipped children’s play area shall be 46 square metres, while the maximum size of such equipped children’s play area shall be 140 square metres (5.5.2).
5.21 Off-street Loading

Minimum off-street loading space requirements are set for all buildings used for non-residential uses. However, when addition to or change to existing use occurs, the by-law states that:

- Where a building or structure has insufficient loading spaces on the date of passing of this By-Law to comply to the requirements of this By-Law, this By-Law shall not be interpreted to require that the deficiency be made up prior to the construction of any addition or a change of use provided, however, that any additional spaces required by this By-Law for such addition or change of use are provided in accordance with all provisions respecting loading (5.21.6).

5.22 Off-street Parking

The by-law states that buildings shall not be altered, enlarged, erected, renovated or used in any zone unless off-street parking areas are provided and maintained. For additions to or changes to existing uses, the by-law states that:

- Where a building or structure has insufficient parking spaces on the date of passing of this By-Law to comply to the requirements of this By-Law, this by-law shall not be interpreted to require that the deficiency be made up prior to the construction of any addition or a change of use provided, however, that any additional spaces required by this By-Law for such addition or change of use are provided in accordance with all provisions respecting parking spaces and areas (5.22.5.8).
4.2.3 Summary of Policy Implications for Church Adaptive Reuse

The provincial and municipal policies and regulations discussed in the previous sections have significant implications for church adaptive reuse as they influence the probability of vacant church buildings being successfully repurposed while retaining elements of their original design and character. In general terms, policies within the Provincial Policy Statement provide support for congregations or developers that are interested in adaptively reusing vacant church buildings. This is mainly because policies in the PPS require municipal planning authorities to encourage and promote the reuse of existing buildings whenever possible in order to achieve set intensification targets within their urban areas. On the other hand, policies within the Ontario Heritage Act present certain challenges for adaptively reusing church buildings that have heritage value as they impose restrictions on features of these buildings can be altered. Generally, these policies are stricter on adaptive reuse projects that involve the alteration of a building envelope. In addition, the Act also has policies that prevent congregations or private developers from tearing down entire or certain sections of these buildings in order to develop new buildings on the site. However, the policy restrictions regarding alterations are not entirely inflexible as they in most cases allow for alterations to be made to the interior of church buildings so as to make the design and interior layout of the church buildings appropriate for new uses.

Policies existing within the City of Kingston Official Plan provide support for congregations or developers seeking to adaptively reuse vacant church buildings in the City. Similar to the PPS, support for church adaptive reuse projects is generally realized through the Official Plan’s commitment to encouraging intensification in the downtown core. Worth mentioning also is the
Official Plan’s strong intent to promote measures that preserve built heritage within in the urban area. These therefore imply that it is in the City’s own policy interest to encourage and provide support for projects that aim to adaptively reuse vacant church buildings. In contrary to the support provided by the policies of the Official Plan, regulations within the Zoning Bylaws and particularly those within the Downtown and Harbour Zoning Bylaw, set restrictions such as amenity and play area requirements that church adaptive reuse projects find difficult to comply to. Complying with parking requirements is also a challenge for church adaptive reuse projects since the Zoning Bylaw regulations requires these projects to meet the parking space requirements of the new use.
4.3 Interviews

This section of the analysis provides a summary of the findings of in-person interviews conducted with key informants from both the public and private sectors. Section 3.3 of the Methodology Chapter outlines the process and rationale for conducting these interviews. Since the interviewees were guaranteed anonymity, none of the interviewee’s names are referenced and all other identifying elements are removed from the interview responses presented in this section. The responses are outlined below according to their corresponding sub-sections in the interview questionnaire.

4.3.1 Planning Policy Framework

The general consensus among the interviewees from the public sector was that the existing planning policy framework both at the provincial and municipal levels supported the adaptive reuse of old buildings that were no longer being used for their original purposes. Specifically, for old church buildings in Kingston that were no longer being used by their congregations, it was stated that it was not in the City’s interest to leave the buildings sitting empty simply because there are no other churches that want to use them as a place of worship. The repurposing of unused church buildings is therefore generally supported by the City’s policies and thus by planning staff. However, it was also noted that there was no special consideration given during the development approval process for projects that involve the adaptive reuse of older church buildings. Like all other development projects submitted to the City for approval, the approval of these projects is reviewed on a case-by-case basis. This generally involves reviewing the proposal in terms of what is expected of the development as outlined in the relevant sections of the City’s Official Plan and the Zoning Bylaw restrictions that affect the property. In most cases
however, the City was said to give approvals for projects that involved the adaptive reuse of older buildings. It was only in cases where a proposed adaptive reuse project creates undue impacts on designated heritage attributes of buildings or on the areas around it that the City rejects the development proposals.

The key respondent interviewed from the private sector shared a similar view with regards to the planning policy framework. From a private sector perspective, the existing planning policy framework was also seen as being generally supportive of adaptive reuse projects. The Official Plan’s support for intensification in the downtown core and its support for heritage conservation were also mentioned as the two main policy directions that encouraged the private sector to engage in adaptive reuse projects. In particular, policies stated under section 7 of the Official Plan that deal with heritage matters were mentioned as being very supportive for the conversion of the former Queen Street United Church and the former Congregational Church. Other broad policies in the Official Plan that deal with sustainability, the effective use of existing resources, effective use of infrastructure and servicing were also said to encourage the reuse of downtown properties.

**Major Opportunities**

The existence of a strong policy commitment on the part of the City to encourage the adaptive reuse of old unused buildings was cited as a major opportunity for developers. This commitment was expressed by, among other things, the presence of many policies that promote intensification and heritage conservation in the City’s planning documents. Apart from this however, the interviewees stated that the existing policy documents were there simply to guide developers in
the general direction the City envisaged for development to take place. The interviewees also stated that it was up to individual developers to come up with creative ideas for what they thought was good for a particular building they wanted to repurpose.

The possibility of entering into heritage easement agreements with the City was also mentioned as another opportunity created by the existing policy framework for developers repurposing heritage buildings. Municipalities are given the authority to enter into conservation easement agreements with property owners under section 37 of the Ontario Heritage Act. Although the incentive to enter into easement agreements with the City may vary for different developers, these agreements in general enable developers to get returns on their property taxes in exchange for agreeing to conserve the heritage attributes of their buildings from unwanted alterations during the adaptive reuse process. In addition to this, the City’s Heritage Grant Program which gives out up to two thousand dollars per year to heritage property owners for refurbishing the heritage attributes of their properties, was also raised as another opportunity developers could make use of. In reality however, the amount of the grant was stated to be insignificant to be actually considered as an opportunity that encourages developers undertaking big adaptive reuse projects. These grants were instead stated to be more beneficial for owners of heritage properties undertaking minor conservation works on their buildings.

**Major Challenges Encountered**

The City’s lack of a single Zoning Bylaw to implement the policies of the Official Plan and other provincial legislation was said to be a challenge for development work in general and for church adaptive reuse projects specifically. As it stands, the City has five principal Zoning Bylaws and
each of these bylaws reflect specific jurisdictional contexts and contain differing definitions, regulations and zone classifications. Even though church buildings were said to have specific zonings, which are usually institutional in character, the zonings varied from Zoning Bylaw to Zoning Bylaw. This makes it challenging for developers as they have to work with different sets of restrictions for similar projects. The City is currently undertaking a comprehensive review of its existing Zoning Bylaws with an objective of amalgamating them into one Zoning Bylaw. Therefore, this problem can be addressed in this process.

Obtaining the approval of Heritage Advisory Committees when working on adaptive reuse projects that involve making changes to heritage buildings was also another challenge for developers. One interviewee stated that the Heritage Advisory Committees often consisted of people who were enthusiasts about architectural history and therefore strongly resisted any physical changes made to designated buildings. This resistance was said to occur even when the alterations proposed were to parts of the buildings that are not covered by the designation bylaws. This problem also occurred in part due to a lack of specificity in the designation bylaw itself. One interviewee claimed that the designation bylaw was very minimal and left a lot open to interpretation thereby creating misconceptions as to what can and cannot be altered. As a result, developers have to at times go through unnecessary lengthy and detailed educational and negotiation processes to try to convince the committee members about the benefits that will be achieved from implementing their adaptive reuse projects.

Even though this challenge is not unique to the City of Kingston, one key informant interviewed indicated that the planning process in general was still largely directed towards newer
construction. This was stated to be a challenge for developers adaptively reusing older buildings as there was no specific set of guidelines addressing the issues of older buildings. Together with this, it was stated that the problem also created a shortage of staff that were capable of working with older buildings and understanding how the existing regulatory framework could be adapted to work with these buildings. The issue therefore was stated to have created a mindset, experience and training challenge that many municipalities have difficulty providing.

**Incentives Provided by the Municipality**

The City was stated to have an incentive-oriented approach to development. The incentives are provided through the Municipal Incentive Programs. The programs are mainly aimed at encouraging redevelopment by providing financial incentives for developers who undertake brownfield redevelopment projects within the Community Improvement Plan Area. However, the interviewees stated that these programs do not include adaptive reuse projects and that the City does not provide direct financial incentives as such for developers who undertake adaptive reuse projects. Even in some few cases where developers received financial incentives, the process for getting the incentives was said to be very rigorous. One of the interviewees, when asked about how developers felt about incentives, said:

“The conclusion most developers have come to is that they the developers are in the best position to understand the budget, understand how to make money and so rather than having to fill out a lot of forms and meet a lot of criteria to justify they are given money by the public agencies, they rather the public agencies make the rules very clear and the process transparent and efficient.”
For developers undertaking adaptive reuse projects, the assistance provided by the City is therefore more in procedural issues rather than financial incentives. Assistance provided by municipal staff for developers starts with a pre-application consultation during which developers are provided with detailed feedback on their preliminary development application by City staff from multiple departments. This, in addition to establishing a transparent relationship between City staff and developers from the get-go, reduces the risk on developers as they are made aware of any pitfalls they might encounter prior to investing heavily on the projects. With regards to the former Congregational and Queen Street United Church projects, financial incentives were also not provided by the City for the developers. The incentive received by the developers in both cases was stated to be in the restructuring of the way the City dealt with heritage properties. This was explained in terms of the City establishing the Heritage and Urban Design Section within its planning department and passing a Delegation Bylaw. This was said to have helped speed up the development process for developers as the section has its own dedicated professional staff that have delegated authority to undertake regulatory work that formerly went to the Heritage Advisory Committee of council. This committee was made up of volunteers and used to meet only once a month.

Other incentives provided by the City were stated to be part of the overall development approval process and they affected projects on a case-by-case basis. These incentives included things like flexibility in rezoning properties and the reduction of certain regulatory requirements such as parking space and particularly, reductions in amenity and park space requirements in situations like in the downtown core where it is not possible for developers to meet the set requirements. With regards to fulfilling parking space requirements, it was mentioned that the City allowed
phased construction to take place so that developers have interim approvals for surface parking until they can build underground parking in later phases of their project.

Section 37 of the Ontario Planning Act allows municipalities to authorize increases in the height and density of developments otherwise permitted by their by-law in exchange for additional public goods. However, the interviewees from both the public and private sectors stated that the City had no formal process of providing these incentives for developers like in other cities such as Toronto. This was stated to be due to the ineffectiveness of these incentives to attract the interest of developers as the Kingston market is very small. Nevertheless, one interviewee explained that density bonusing was to some extent part of the rationale behind the adaptive reuse of the former Queen Street United Church.

4.3.2 Zoning Requirements

The process for meeting zoning requirements is generally unique to individual projects since each proposed development project, whether new build or adaptive reuse, will have its own particular issues to contend with. When asked to compare how difficult it was to comply with the existing zoning requirements for adaptive reuse projects and new builds, an interviewee from the private sector stated that it was relatively more difficult for adaptive reuse projects to comply with these requirements. However, this view was in contradiction with that held by an interviewee from the public sector who suggested that meeting zoning requirements was not necessarily more difficult for adaptive reuse projects. According to the interviewee, the level of difficulty in complying with the zoning restrictions did not depend on the type of the project but rather instead on the project’s location within the city as different parts of the city are given
different treatments depending of their significance. Restrictions in terms of what can be done on a specific site were stated to be stricter in the Downtown and Harbour areas of the city because of the area’s significance to the City’s overall character. The restrictions however get more relaxed and open to creative response to sites as one moves further away from the Downtown area.

The two adaptive reuse case studies are located within the area of the City where generally stricter sets of regulatory requirements apply. However, as these projects differed significantly in terms of the type and scale of their conversions, the number of regulatory requirements they had to comply with also differed significantly. In the case of the former Congregational Church, there was relatively little challenge in complying with the existing zoning requirements. A zoning bylaw amendment was not required in this case as the proposed use of a Day Care Centre fell within the permitted use for the zone. Therefore, the project was stated to have only gone through a site plan control. The proposed changes to the building also involved only interior alterations and therefore complying with building height and setback requirements did not also apply to the project. In addition, complying with other zoning requirements such as density, parking space, and amenity area requirements were also not applicable to the project.

The proposed adaptive reuse project for the former Queen Street United Church involves both a conversion of the old church building itself and an addition of new buildings. For this reason, the project has to comply with more regulatory restrictions than the former reuse project discussed. With regards to the regulatory compliance challenges facing this project, a key informant interviewed from the City declined to comment on the specifics as the review of the project was
still ongoing. A Zoning Bylaw amendment is however required for the project to be approved as the proposed uses of the project are not specifically permitted in the existing Zoning Bylaw. The interviewee however stated that the approval of the Zoning Bylaw amendment would not be a challenge for the project as the proposed development was in keeping with the principles of the Official Plan. A second interviewee that worked on the project also indicated that compliance with other regulatory requirements such as massing and density where addressed through good design solutions. For instance, the interviewee stated that the massing of the new building was made to be compatible with its surrounding by bringing down the bulk of the building where it meets with the residential neighbourhood to the north of the project. This was said to pull back the density of the building away from the street fronting the neighbourhood and towards the interior of property. With regards to the conversion of the old church building itself to residential use, the new use should comply with parking space and play space requirements set in the Zoning Bylaw. According to the interviewee, parking space requirements will be met by providing one parking space for each residential unit underneath the new building. However, complying with the play space requirements for residential development in the Zoning Bylaw appears to be a challenge for the project and therefore a variance would be required for the project to comply with this requirement.

4.3.3 Heritage Designation

These two former church buildings, as mentioned in previous sections, are designated heritage buildings under the Ontario Heritage Act. Therefore, any alterations made to these buildings should be in compliance with the regulations outlined in the Act. A common notion that exists with regards to these regulations is that they make the adaptive reuse of heritage buildings
substantially more difficult for developers. However, discussions with the interviewees from both the public and private sectors indicated that this notion is not necessarily true. When asked if designating heritage buildings makes it more challenging for developers to adaptively reuse the buildings, one of the interviewees stated that:

“There is the standard phobia that if it is heritage designated, it’s got too many restrictions on it. But it’s actually an advantage but you have to know how to work with it ... You need to follow the Ontario Heritage Toolkit, you need to follow the Act, and you need to be very clear about what the key elements you need to conserve and what can be changed because in most cases you are not really preserving, you are keeping some elements of a building and you are rehabilitating, your are changing stuff.”

Another interviewee also stated that clauses within Section 33 of the Ontario Heritage Act that prevent owners of designated properties from making alterations to their properties do not entirely discourage adaptive reuse. Depending on the nature of the project, developers were said to face varying levels of difficulties in making alterations to designated buildings. While getting approval for an adaptive reuse project that significantly changes a designated building is difficult, it was stated that projects that retain the envelope of designated buildings unchanged are generally approved without facing any major challenges. With regards to complying with the heritage regulations, no major challenges that were faced by the two case study projects were brought up during the interviews. This might be in part because the City of Kingston does no designate the interior features of heritage buildings and thus developers are generally allowed to make interior alterations to designated buildings. Heritage designation per se therefore does not prevent developers from adaptively reusing older buildings. In fact it was stated that designation,
from a marketing perspective, was in most cases beneficial to developers because they can get premiums from the heritage elements associated with the buildings. However, a Heritage Impact Statement is required for these types of projects to get approved. Likewise, a Heritage Impact Statement describing the heritage significance and the heritage attributes of these two former church buildings was prepared and submitted to the City.
Chapter Five: Conclusions and Recommendations

5.1 Conclusions

Adaptive reuse offers a creative and sustainable solution for preserving and reusing old church buildings once they stop functioning as places of worship. However, undertaking a successful adaptive reuse of an old church building is a complex process that is influenced by several factors. The review of literature revealed that the factors that usually make this process more complicated than standard adaptive reuse projects were related to the unique design of the buildings and the historic and cultural values often attached to them. Moreover, it also showed that complying with numerous policy and regulatory standards often makes the process of repurposing old church buildings more complicated.

This study reviewed the effects provincial and municipal planning policies and regulations have on the adaptive reuse of old church buildings. To achieve this, the study took a closer look at how developers undertaking adaptive reuse projects benefited from or were constrained by provisions that existed within primary policy and regulatory documents. The review was based on four provincial and municipal planning documents that regulate land use development. Opportunities and barriers were also identified through key informant interviews and by using two church adaptive reuse projects as case studies. In general, the existing planning policy framework was found to both facilitate and impede the adaptive reuse of older church buildings.

Specifically, the results of the study revealed that there is a general policy support for adaptive reuse initiatives both at the provincial and municipal levels. The primary policy documents that regulate land use development, which include the Provincial Policy Statement, the Ontario
Heritage Act and the Official Plan, all have several provisions that support or influence adaptive reuse initiatives. This strong policy commitment aimed at encouraging the adaptive reuse of old unused buildings with heritage value is primarily realized through numerous policies that support intensification in the downtown core and heritage conservation. However, there are no provisions within these policy documents that explicitly speak to the adaptive reuse of old church buildings. The results showed that there are very limited opportunities for developers to get financial incentives for adaptively reusing old church buildings. The very few opportunities that exist are limited to the returns developers could get on their property taxes for entering into heritage conservation easement agreements with the City. Small grants for refurbishing the heritage attributes of heritage properties are also made available for property owners through the City’s Heritage Grant Program. However, the incentives provided by the City for developers are primarily in the form of facilitating procedural issues that hinder project success. The pre-application consultation was identified as a very important strategy for lessening developers’ risk.

A number of policy and regulatory barriers that impede the successful repurposing of old church buildings were also identified. The findings of the study indicated that, apart from the very limited financial opportunities available for developers, there is a general lack of policy commitment for providing tangible financial incentives that encourage developers to undertake adaptive reuse initiatives. The existing Zoning Bylaws also fail to provide similar zonings for church buildings. As a result, developers repurposing undertaking church adaptive reuse projects have to work with different sets of restrictions for similar types of projects. Another barrier identified for the successful adaptive reuse of church buildings was that created during the
approval process of project proposals by Heritage Advisory Committees. Although the end goal of these committees is to ensure the protection of buildings with heritage value, their strong resistance to building alterations was stated to discourage developers from undertaking church adaptive reuse projects as it increased project costs. Finally, there are no explicit policies and specific sets of regulations that deal with adaptive reuse as the existing planning framework is still largely directed towards new build.

5.2 Recommendations for the Municipality

The adaptive reuse of older buildings within the City serves a number of purposes, all of which will enhance the City’s rich and diverse heritage and contribute to achieving the City’s goal of becoming one of the foremost sustainable municipalities in the nation. The following are a set of recommendations that should be explored by the municipality to further enhance the repurposing process of old unused church buildings within the City.

1. The City should take a more proactive role in encouraging adaptive reuse projects.

Currently, most of the adaptive reuse initiatives in the City tend to be driven by development applications rather than something that is happening proactively. As many of the downtown churches are struggling to keep their doors open due to the constant decrease in church membership, City staff should go out, identify struggling congregations and actively engage in discussions with them on possible ways of preserving and reusing the buildings and also keeping the church functions. The City can establish a working group from the various departments to facilitate the process. This will also benefit potential developers interested in repurposing the buildings as it will speed up the process and in a worst case scenario, head off some disasters
where congregations sell their churches to developers that have no intention to adaptively reuse the buildings.

2. The City should develop new funding initiatives that encouraging adaptive reuse projects.

The City should develop alternative financial incentives to encourage the repurposing of old church buildings and other adaptive reuse projects. Evidence from municipalities where adaptive reuse has been successful shows that a key to the success of adaptive reuse initiatives is the offering of financial incentives. Therefore, the City should explore new ways of providing financial incentives that will entice developers to undertake these adaptive reuse projects. Funding for select adaptive reuse projects could be provided through the City’s Municipal Incentive Programs. The City should also explore other ways of providing tangible financial incentives that could be adapted to the context of Kingston from successful cities such as Los Angeles where developers are given different types of tax credits.

3. The City should streamline the existing Zoning Bylaws and provide more flexibility in meeting zoning requirements.

The City should introduce a single zoning for church buildings throughout the City as part of its ongoing comprehensive zoning review. Legislations that specifically target adaptive reuse projects and reduce zoning requirements for these projects should also be implemented. Many non-compliant requirements such as parking space, density, setbacks, and amenity and play area requirements should also be permitted without requiring a variance. This will make the
repurposing of older church buildings that might require a lot of resources to meet zoning requirements more attractive to developers as viable reuse projects.

4. The City should develop specific designation criteria.

The City should develop and adopt specific criteria that will thoroughly define and specify the attributes of buildings that should be preserved from alterations during adaptive reuse projects. This will assist in reducing the challenges that developers face during the approval of development applications by the Heritage Approval Committee.
References


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Ministry of Tourism, Culture and Sport. 1990. Ontario Heritage Act (Amended 2009)


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Appendix A. Research Protocol

- Literature Review
- Selection of Case Studies
- Formulation Research
- Establishment of Theoretical Framework
- Development of Interview Questions & Selection of Planning Documents
  - Key Informant
  - Document Review
- Data Analysis
- Report Writing
- Review of Report
Appendix B. Interview Questions

I. Planning Policy

1. Does the City of Kingston’s Planning Policy Framework encourage adaptive reuse efforts?
   a. What are the major opportunities that it presents for parties involved in the adaptive reuse of old buildings?
   b. What are the major challenges that it presents for parties involved in the adaptive reuse of old buildings?

2. Was there any assistance provided by the Planning and other City departments that supported the adaptive reuse of this building?
   a. Were there any financial incentives provided by the City? If so, what were the details of the incentives?
   b. Were there any other incentives such as density bonuses provided for preserving and reusing the building? If so, please describe the incentives provided.

II. Zoning Requirements

3. How did the Zoning bylaw and designation affect the development of the project?
   a. Were there any difficulties faced in rezoning the property to adhere to the new use if it was not already zoned accordingly? If so, please describe process.

4. Were there difficulties encountered in adapting the building to comply with other existing zoning requirements?
   a. Were there any compatibility issues with the surrounding land uses? If so, what are they and how did they affect the project?
   b. Did the building meet current parking space requirements? If no, what was done to comply with the requirements?
   c. Did the building comply with the density requirements for the area? If no, what was done to comply with the requirements?
   d. Were there any other zoning requirements that affected the conversion process of the building? If so, describe how they affected the project.
   e. Were there any other variances allowed for not complying with other zoning requirements? If yes, what were the details?
III. Heritage Designation

5. Is the building designated under the Ontario Heritage Act? If so, what process was completed and what obstacles were present in reusing the building?
6. What effects does the building being designated as heritage have on its adaptive reuse?
7. Are there benefits to the building being a heritage building, whether it is designated or not? If so, what are the benefits?

V. Conclusion

8. What did you find to be the most important policy tool that affected the conversion of the building?
9. Were there any compliance issues that you thought may cause more of a problem than what ended up occurring?
10. Are there any other important opportunities or barriers created by the existing regulations that were not brought up by any of the above questions that affected the adaptive reuse of the building? If so, what are they and how did they affect the conversion process?
11. Are there any additional comments that you would like to make regarding this topic?