

Report to Planning and Environment Committee

To: Chair and Members
Planning and Environment Committee

From: Scott Mathers, MPA, P. Eng.
Deputy City Manager, Planning and Economic Development

Subject: Demolition Request and Heritage Alteration Permit
Application by Zelinka Priamo Ltd. for 320 King Street –
Downtown Heritage Conservation District, Ward 13

Date: Monday August 14, 2023

Recommendation

That, on the recommendation of the Director, Planning and Development, the application made under Section 42 of the *Ontario Heritage Act* seeking approval to demolish the existing parking garage and erect a new high-rise building on the subject property at 320 King Street, within the Downtown Heritage Conservation District, **BE PERMITTED** as proposed and described herein and shown in drawings attached as Appendix D, subject to the following terms and conditions:

- a) Design Modifications be implemented if and as appropriate to accommodate any measures required to mitigate potential telecommunications signal interference;
- b) A vibration monitoring strategy be prepared and undertaken during demolition and construction activities to assess and mitigate potential vibration impacts on adjacent cultural heritage resources;
- c) The Heritage Planner be circulated on the applicant's Building Permit application drawings to verify compliance with this Heritage Alteration Permit prior to issuance of the Building Permit; and,
- d) The Heritage Alteration Permit be displayed in a location visible from the street until the work is completed.

Executive Summary

The Demolition Request and Heritage Alteration Permit application are seeking a permit from Municipal Council to demolish the existing parking garage and to erect a new high-rise building on the subject property at 320 King Street, within the Downtown Heritage Conservation District, in accordance with Section 42 of the *Ontario Heritage Act*. The subject property is identified in the *Downtown Heritage Conservation District Plan* as an "infill" property that does not retain identifiable heritage characteristics. The existing parking garage on the subject property is a suitable candidate for replacement with a new building that is compatible with the *Downtown Heritage Conservation District Plan*. The design of the new high-rise building proposed for the subject property is compliant with the policies and guidelines of the *Downtown Heritage Conservation District Plan*. Staff recommend that the Demolition Request for the existing parking garage and Heritage Alteration Permit application for the construction of a high-rise building on the subject property be approved with terms and conditions.

Linkage to the Corporate Strategic Plan

This recommendation supports the following 2023-2027 Strategic Plan area of focus "Wellbeing and Safety":

- London has safe, vibrant, and healthy neighbourhoods and communities.
 - Londoners have a strong sense of belonging and sense of place.
 - Create cultural opportunities that reflect arts, heritage, and diversity of community.

Analysis

1.0 Background Information

1.1 Location

The subject property at 320 King Street is located on the northwest corner of King Street and Waterloo Street. (Appendix A).

1.2 Cultural Heritage Status

The subject property at 320 King Street is located within the Downtown Heritage Conservation District (Downtown HCD), which was designated pursuant to Part V of the *Ontario Heritage Act* by By-law No. L.S.P.-3419-124.

The subject property is identified as “I” (Infill) with a Commercial landscape pattern (ii) by the *Downtown Heritage Conservation District Plan (Downtown HCD Plan, March 2012)*; it does not retain identifiable heritage characteristics.

1.3 Description

The subject property at 320 King Street is a rectangular shaped corner lot with a frontage along Waterloo Street of approximately 50.2m (164.7ft) and along King Street of 64.5m (211.6ft), and overall lot area of approximately 3,238.9m² (34,850.5ft²). The subject property is part of a larger parcel that also contains the municipal address 300 King Street, which is the location of the Hilton DoubleTree Hotel. The subject property is adjacent to a parking lot located across King Street to the south, and the Centre Branch YMCA located across Waterloo Street to the east (Appendix B).

Currently there is a two-level, concrete parking garage structure on the property covering the full lot with an entrance and exit ramps at King Street and Waterloo Street, respectively. The structure is surrounded by a mature buffered area which includes a grassed area with numerous trees and shrubs.

Buildings on properties (that are within the Downtown HCD), abutting or in close proximity to the subject property, include high rise towers such as the Hilton DoubleTree Hotel (300 King Street) and the City Centre (TD) Towers (formerly Canada Trust Towers, 380 Wellington Street/275 Dundas Street), as well as the landmark Delta Armouries Hotel (325 Dundas Street). These properties are “A” ranked by the *Downtown Heritage Conservation District Plan* and are included as some of the most significant properties in the Downtown.

2.0 Discussion and Considerations

2.1 Legislative and Policy Framework

Cultural heritage resources are to be conserved and impacts assessed as per the fundamental policies in the *Provincial Policy Statement (2020)*, the *Ontario Heritage Act*, and *The London Plan*.

2.2 Provincial Policy Statement

Heritage Conservation is a matter of provincial interest (Section 2.d, *Planning Act*). The *Provincial Policy Statement (2020)* promotes the wise use and management of cultural heritage resources and directs that “significant built heritage resources and significant cultural heritage landscapes shall be conserved” (Policy 2.6.1, *Provincial Policy Statement 2020*).

“Significant” is defined in the *Provincial Policy Statement (2020)* as, “resources that have been determined to have cultural heritage value or interest.” Further, “processes and criteria for determining cultural heritage value or interest are established by the Province under the authority of the *Ontario Heritage Act*.”

Additionally, “conserved” means, “the identification, protection, management and use of built heritage resources, cultural heritage landscapes and archaeological resources in a manner that ensures their cultural heritage value or interest is retained.”

2.3 Ontario Heritage Act

The *Ontario Heritage Act* enables municipalities to protect properties of cultural heritage value or interest. Properties of cultural heritage value can be protected individually, pursuant to Section 29 of the *Ontario Heritage Act*, or where groups of properties have cultural heritage value together, pursuant to Section 41 of the *Ontario Heritage Act* as a Heritage Conservation District (HCD). Designations pursuant to the *Ontario Heritage Act* are based on real property, not just buildings.

2.3.1 Heritage Permit Approvals

Section 42(1) of the *Ontario Heritage Act* requires that a property owner obtain a permit from the municipality to demolish or remove a building or structure, as well as to erect any building or structure on a property situated in a heritage conservation district that has been designated by the municipality under Part V of the *OHA*. The *Ontario Heritage Act* enables Municipal Council to give the applicant:

- a) The permit applied for;
- b) Notice that the council is refusing the application for the permit; or,
- c) The permit applied for, with terms and conditions attached. (Section 42(4), *Ontario Heritage Act*)

Municipal Council must make a decision on a permit application within 90 days, or the request is deemed permitted (Section 42(4), *Ontario Heritage Act*).

2.4 The London Plan

The policies of *The London Plan* found in the Key Directions and Cultural Heritage chapter support the conservation of London's cultural heritage resources for future generations. To ensure the conservation of significant cultural heritage resources, including properties located within a Heritage Conservation District, *The London Plan* provides the following policy direction; these policies are most relevant to this application:

Policy 565_ New development, redevelopment, and all civic works and projects on and adjacent to heritage designated properties and properties listed on the Register will be designed to conserve the heritage attributes and character of those resources and to minimize visual and physical impact on these resources. A heritage impact assessment will be required for new development, redevelopment, and civic works and projects on, and adjacent to, heritage designated properties and properties listed on the Register to assess potential impacts and explore alternative development approaches and mitigation measures to address any impact to the cultural heritage resource and its heritage attributes.

Policy 594_ Within heritage conservation districts established in conformity with this chapter, the following policies shall apply:

- 1. The character of the district shall be maintained by encouraging the retention of existing structures and landscapes that contribute to the character of the district.*
- 2. The design of new development, either as infilling, redevelopment, or as additions to existing buildings, should complement the prevailing character of the area.*
- 3. Regard shall be had at all times to the guidelines and intent of the heritage conservation district plan.*

Policy 596_ A property owner may apply to alter a property within a heritage conservation district. The City may, pursuant to the Ontario Heritage Act, issue a permit to alter the structure. In consultation with the London Advisory Committee on Heritage, the City may delegate approvals for such permits to an authority.

Policy 597_ Where a property is located within a heritage conservation district designated by City Council, the alteration, erection, demolition, or removal of buildings or structures within the district shall be subject to the provisions of Part V of the Ontario Heritage Act.

Policy 599_ Where a property is located within a heritage conservation district and an application is submitted for its demolition or removal, the

Heritage Planner and the Clerks Department will be notified in writing immediately. A demolition permit will not be issued until such time as City Council has indicated its approval, approval with conditions, or denial of the application pursuant to the Ontario Heritage Act. Council may also request such information that it needs for its consideration of a request for demolition or removal.

2.5 Downtown Heritage Conservation District Plan

The *Downtown Heritage Conservation District Plan (Downtown HCD Plan)* includes policies and guidelines related to the construction of new buildings within the District. Section 6.1.4 deals with new construction and is a significant portion of the *Downtown HCD Plan*. It addresses issues of setback, height and massing and façade composition, and general principles of compatibility of the 'old' with the 'new'. These guidelines are intended to help ensure that new construction respects the history that surrounds it in material, massing and other aesthetic choices.

An analysis of the policies and guidelines for the Demolition Request and Heritage Alteration Permit application is contained below in Section 4.4 (below).

3.0 Financial Impact/Considerations

None.

4.0 Key Issues and Considerations

4.1. Proposed Development

A planning application (Z-9570) for a Zoning By-law Amendment to allow the development of a 35-storey, 435-unit mixed building on the subject property at 320 King Street was considered at the March 23, 2023, Planning and Environment Committee and was passed by Council (April 25, 2023, By-law no.Z.-1-233103). A Site Plan Application (SPA23-022) has subsequently been submitted.

The 35-storey development on the subject property is comprised of a building with a 4- and 5-storey podium and tower (Appendix C, Appendix D). The podium contains commercial space on the ground floor, two levels of underground parking are also proposed. The development is comprised of a building with a 4- and 5-storey podium, and a slimmer tower portion, positioned off-centered on the podium towards the King Street and Waterloo Street corner. The proposed building is stepped back above the podium at both the King Street and Waterloo Street frontages. The height of the podium is shown on elevations as 18.37m along King Street, and 15.47m along Waterloo Street (Appendix C, A4.1, A4.2). The step back to the tower is indicated at 5.11m and 4.94m at the King and Waterloo Street frontages, respectively. The podium contains commercial space on the ground floor, a parking garage on the interior, with apartment units wrapping around the King Street and Waterloo Street frontages on floors 2 to 4. A rooftop amenity area is proposed above the four-storey podium and the upper roof.

The building is articulated by distinct building façades. The overall massing reflects the vertical division and articulation of the range of unit layouts in the building with several different building materials being used. The 'tower-over-podium' built form provides a pedestrian oriented interface to enhance a human-scale at grade.

The primary building entrance is located along the King Street frontage with a steel canopy marking the entrance location at the corner. Several pedestrian pathways connect the commercial uses on the ground floor to the existing municipal sidewalk on King Street. The site design provides for a setback of the building from King and Waterloo Streets to 1) maintain the commercial landscape identified within the Downtown HCD Plan; 2) maintain the established street-walls of adjacent buildings; and, 3) contribute to a positive pedestrian public realm.

A variety of materials, colours, and textures break the massing of the building into smaller sections, both vertically and horizontally, to frame the street and enhance the streetscape. Materials include the use of a glazed aluminum window wall system with spandrel panels, architectural brick/panels in various natural grey and earth tones, precast stone panels, aluminum commercial storefront system, glass and aluminum

handrails at exterior balconies, and a steel canopy at the corner entrance at King and Waterloo Streets.

The intention is for the exterior design of the building to reflect modern architectural detailing – but remaining distinctive – while drawing inspiration from surrounding heritage architectural elements and materials. Notably, the brown and red brick used for the podium reflects the colour palette and materials used for the Delta Armouries Hotel. This colour palette is also used to integrate the base podium with the tower form, with coloured material portions continuing vertically up the tower of the building; visually linking the base with the tower. The overall design of the proposed building is intended to convey a modern look while remaining respectful to the historical character of its surrounding context.

4.2 Heritage Impact Assessment (HIA)

A Heritage Impact Assessment (HIA, Zelinka Priamo Ltd., dated November 17, 2022) was submitted as a part of the planning application, and accompanied the Demolition Request/Heritage Alteration Permit application. Conclusions of the HIA identified both direct and indirect impacts which could result in potential negative impacts on the subject property and adjacent properties (Appendix E).

Direct impacts include the demolition of the existing parking garage on the subject property. Mitigation of this direct impact was not recommended because the subject property was identified in the *Downtown HCD Plan* as an (“I”-Infill) property that does not retain identifiable heritage characteristics. The HIA did not recommend retention of the existing parking garage on the property.

Indirect impacts were identified in the HIA and include possible negative impacts on adjacent properties from vibrations due to demolition and construction activity. Based on the identified impacts, the following mitigation measures were recommended by the HIA:

- *Appropriate construction methodologies to be prepared, and careful adherence to such methodologies to prevent any undue impacts to adjacent identified cultural heritage [...]; and,*
- *If required, monitoring for possible construction/demolition impacts such as vibrations.*

4.3 Demolition Request

The proposed development is predicated on the demolition of the existing parking garage on the subject property, which is designated pursuant to Part V, *Ontario Heritage Act*, as part of the Downtown Heritage Conservation District. Pursuant to Section 42(1), *Ontario Heritage Act*, the approval of Municipal Council is required to demolish the existing parking garage. A Heritage Impact Assessment (HIA) was submitted as a part of the Demolition Request (Zelinka Priamo Ltd., dated November 17, 2022), which was received on June 27, 2023. The maximum 90-day timeline for this Demolition Request, pursuant to Section 42(4), *Ontario Heritage Act*, expires on September 25, 2023.

In general, the demolition of buildings within any of London’s Heritage Conservation Districts is discouraged. However, as noted in Section 4.6, *Downtown HCD Plan*, there are situations where demolition may be an appropriate consideration such as partial destruction due to fire or other catastrophic events, severe structural instability, and occasionally redevelopment that is in keeping with appropriate City policies. In these situations where consideration of a demolition request is appropriate, photographic documentation and reclamation is recommended.

The subject property at 320 King Street is identified in the *Downtown HCD Plan* as an “infill” property that does not retain identifiable heritage characteristics. As the property does not have a “historic” ranking in the *Downtown HCD Plan*, the existing parking garage is a suitable candidate for replacement with a new building that is compatible with the *Downtown HCD Plan*.

The Heritage Planner undertook photographic documentation of the property (see Appendix B). The site visit undertaken on June 28, 2023, did not identify any suitable materials for salvage, reclamation, or reuse.

4.3.1 Mitigation of Demolition Impacts

The *Ontario Heritage Act* allows municipalities to establish terms and conditions for demolition, as well as the preparation of strategies to mitigate potential impacts from demolition and/or construction activities.

Relevant to this application is the submission of a Request for Demolition in advance of final Site Plan Approval (SPA), which if permitted, could result in an extended time with an open, active construction site while site plan approval remains underway.

Further, findings of the Heritage Impact Assessment (HIA) identify the potential for impacts from demolition and construction activity due to the close proximity of significant heritage resources to the subject property and area of development; monitoring of vibrations caused by demolition and construction activity is recommended.

As the majority of the study area properties are situated directly adjacent or opposite King Street to the proposed development with demolition and construction activities anticipated within 40m of the study area, indirect impacts from vibration are possible. Where construction activities are anticipated proximate to heritage resources, monitoring activities of vibration levels can gauge whether such activities exceed acceptable vibration levels as determined by a qualified engineer.

An approach to mitigating the potential vibration effects can be done in two stages: first, if required, to develop appropriate construction methodologies in the form of site plan controls, site activity monitoring, or avoidance; second, further action can be taken, if deemed necessary, in the form of monitoring for possible construction and/or demolition impacts such as vibrations during the construction phase.

4.4 Heritage Alteration Permit application (HAP23-040-L)

Accompanying the Demolition Request, a complete Heritage Alteration Permit (HAP) application was received by the City on June 27, 2023, for the proposed new building. The maximum 90-day timeline for this Heritage Alteration Permit application, pursuant to Section 42(4), *Ontario Heritage Act*, expires on September 25, 2023.

Included below in Table 1 to Table 4, is an analysis of the proposed development on the subject property at 320 King Street alongside relevant policies found in Section 6.1.4./6.1.4.1 (New Construction) and 6.2.2 (Commercial Landscape), *Downtown HCD Plan*. Section 6.2.7 (Spatial Elements), *Downtown HCD Plan*, is also noted and considered.

Table 1: Analysis of the applicable policies of Section 6.1.4 (New Construction – General Principles), Downtown Heritage Conservation District Plan, for the proposed new development

General Principles	Analysis
Conserve character-defining elements of neighbouring buildings.	The proposed development is limited to the subject property at 320 King Street and will not directly impact abutting and adjacent buildings.
New development that is physically and visually compatible with the heritage context while not replicating it.	The podium design of the new building responds to the fundamental scale and rhythm of the Downtown HCD by lowering the perceptible massing and height of the base of the building to be more in line with the low to mid-rise height typical of the District's historic streetscape character, while also applying distinctive, contemporary design in a tower-over-podium form.
New development that is decipherable from historic precedent while complementing adjacent heritage buildings.	The proposed development applies distinctive contemporary design and material with an upper tower that is set back from the street edge. The height, materials and colour palette used on the

General Principles	Analysis
	podium base are complimentary with the Armouries building.
Roof shapes and major design elements of the development that are complementary to surrounding buildings and heritage patterns.	The podium datum line is compatible with the adjacent Armouries building and a complimentary colour palette is applied, reflecting the tones of the Armouries' building exterior.
Setbacks of new development that are consistent with adjacent buildings.	The new building is setback to align with the Armouries building along Waterloo Street and the Hilton DoubleTree Hotel building along King Street.
New buildings/entrances are oriented to street and encouraged to have architectural interest.	The new building's primary entrance is located along the King Street frontage with a canopy and signage to clearly define the entrance along the streetscape. A variety of materials, colours, and textures – such as brick, brick panels, and precast stone in neutral colours of brown, red and grey tones, as well as glass panels, aluminum spandrels and steel – add architectural and visual interest. Several pedestrian pathways connect the commercial uses on the ground floor to the existing municipal sidewalk on King Street.
New development that responds to unique conditions or location (i.e. corner properties) by providing architectural interest/details at both street facades.	The difference in the podium heights at the King Street and Waterloo Street elevations differentiates each of the facades and addresses differing adjacencies at the Armouries building and the Hilton DoubleTree hotel. A steel canopy feature is positioned at the intersection of the two podium heights which marks the corner and adds architectural interest.

Table 2: Analysis of the applicable policies of Section 6.1.4 (New Construction – Façade Composition), Downtown Heritage Conservation District Plan, for the proposed new development

Façade Composition	Analysis
New development to enhance character of street by using high quality materials (brick, stone and slate)	A variety of materials, colours, and textures – such as brick, brick panels, and precast stone in neutral colours of brown, red and grey tones as well as glass panels, aluminum spandrels and steel – are used to break the massing of the building into smaller sections, both vertically and horizontally, to frame the street and enhance the streetscape.
Detailing should add visual interest and texture.	The new building is designed with facades that are distinctive from one another. The podium heights on the south and east elevations differ in height and the architectural and landscape treatment at the commercial level varies. The massing and articulation of the tower perceptibly varies on all four elevations.
One-storey commercial faces must characterize new and renovated buildings. Storefronts that have a two-	Commercial space at street level, within the podium, is one floor with storefronts design to reflect this feature.

Façade Composition	Analysis
level or greater presence on the street should be avoided.	
Retain a 3 to 4-storey height at the building line with step back of 5m above 18m.	The new building design includes a 4- and 5-storey podium (Waterloo St, 15.47m; King St, 18.37m) with step backs above the podium at of 4.94m and 5.11m, respectively.
At grade - up to 80% glazing is appropriate: 2nd floor and above +/- 50% glazing (with between 25% < and <75%)	The glazing of the proposed development appears to be compliant with the <i>Downtown HCD Plan</i> .
Horizontal rhythm and visual transitions between floors articulated.	The new building design is articulated by distinct building façades. The overall massing reflects the vertical division and articulation of the range of unit layouts in the building with the use of a mix of building materials. The contemporary tower-over-podium form of the new building establishes a horizontal rhythm at the street level, with upper level window placement and glass/aluminum panel system and balconies, indicating on the exterior by their function, floor levels.
Floor-ceiling height of ground floor to be consistent with heights and respect scale of adjacent buildings.	The podium datum line is compatible with the adjacent Armouries building.
New development to respect significant design features and horizontal rhythm of adjacent buildings.	A variety of materials, colours, and textures break the massing of the new building into smaller sections, both vertically and horizontally, and a complimentary colour palette is applied, reflecting the tones of the Armouries' exterior. The podium datum line is compatible with the adjacent Armouries building.
Blank façades are not permitted facing main or side streets.	There are no blank facades facing King Street or Waterloo Street.
New development is sympathetically designed to reflect District heritage attributes (massing, rhythm of solids and voids, significant design features, and high-quality materials)	A variety of materials, colours, and textures break the massing of the new building into smaller sections, both vertically and horizontally, and a complimentary colour palette is applied, reflecting the tones of the Armouries' exterior. A podium is used to create a pedestrian scale at the street level and to make the scale more compatible with the historic context. The podium datum line is compatible with the adjacent Armouries building.

Table 3: Analysis of the applicable policies of Section 6.1.4 (New Construction – Setback, Height, and Massing), Downtown Heritage Conservation District Plan, for the proposed new development

Setback, Height, and Massing	Analysis
New development to maintain and enhance the continuity of the street edge by building out to front property line	The proposed development maintains the continuity of the street edge by building out to the property line. The new building is setback to align with the Armouries building along Waterloo Street and the Hilton DoubleTree Hotel building along King Street.

Setback, Height, and Massing	Analysis
Façades should be two-storeys minimum and no more than 18m maximum.	The design of the proposed development includes a 4- and 5-storey podium which functions as a façade. The façade is approximately 15.47m in height along Waterloo Street and 18.37m along King Street.
New development to consider the perception of building height from the pedestrian's view on the sidewalk.	The tower-over-podium built form of the proposed development provides a pedestrian oriented interface at grade to ensure the new building is designed with a human scale at grade. Several pedestrian pathways connect the commercial uses on the ground floor to the existing municipal sidewalk on King Street. The site design contributes to a positive pedestrian public realm.
The scale and spatial understanding of the District should be retained while allowing for new development.	The podium design establishes a base height that is compatible with the scale of the District lowering the perceptible massing and height of the base of the building to be more in line with the low to mid-rise height typical of the District's historic streetscape character. The tower-over-podium high rise form allows for a contemporary form and use for the new development.
Step-backs not permitted less than 13m in building height.	Step backs occur at the 4- and 5-storey podium height with a step-back above the podium of 4.94m (along Waterloo Street) and 5.11m (along King Street), respectively.
New development abutting existing structures at the building line to match adjacent building height or provide visible/apparent offset in height to maintain the visual integrity of the existing structure.	The podium design responds to the datum line of the adjacent Armouries building.
Single-storey, new development is discouraged.	The proposed development is for a 35-storey, high-rise residential building with a 4- and 5-storey podium.
New development to build the full extent of the property width fronting the HCD streets.	The proposed development builds to the full extent of the property's width along Waterloo Street and King Street.

Table 4: Analysis of the applicable policies of Section 6.2.2 (Commercial Landscape – Landscape and Streetscape), Downtown Heritage Conservation District Plan, for the proposed new development

Landscape and Streetscape	Analysis
New development built out to the front and side lot lines.	The new building is fully built out to street line along Waterloo Street and King Street.
New tree plantings where sidewalk is greater than 3.0m in width.	Street trees have been identified on the site plan drawing A1.2. Size not noted.
Provide landscaping to screen parking and for pedestrian quality.	Not applicable. Parking is internal to the structure and underground.
Reinforce significant historic cultural gardens and landscapes.	Not applicable

Landscape and Streetscape	Analysis
Existing lanes and pathways shall be preserved and positive uses enhanced	Not applicable.

Several historic views have been recorded in the *Downtown HCD Plan* from specific vantage points in historic photos, postcards, publications. Mostly these have been views of landmark buildings and their settings. Policy 6.2.7 Spatial Elements – Views and Vistas, *Downtown HCD Plan*, recommends that vistas and sight lines toward significant historic cultural features and buildings be preserved, reinstated, and reinforced. Relevant to this application is the view of the Armouries building seen from the north-west corner of Waterloo Street and Dundas Street (Appendix B, Image 7 and 8). The proposed development does not obstruct or interfere with the view of the corner at the intersection or of the primary facades of the Armouries building along Waterloo Street and Dundas Streets.

The analysis finds that the proposed development of the new high-rise building on the subject property at 320 King Street complies with the policies and guidelines of the *Downtown Heritage Conservation District Plan*.

4.4.1 Consultation

In accordance with Section 42(4.1), *Ontario Heritage Act*, the Community Advisory Committee on Planning (CACP, the City’s municipal heritage committee) was consulted on this demolition request and Heritage Alteration Permit application at its meeting on August 9, 2023. Notification of the demolition request was sent property owners within 120m of the subject property on July 25, 2023, as well as to community groups including the Architectural Conservancy Ontario – London Region, London & Middlesex Historical Society, and the Urban League. Further, notice was also published in *The Londoner* on July 27, 2023. At the time of writing, no replies have been received regarding this demolition request.

Conclusion

As the property at 320 King Street is not identified as historically significant in the *Downtown HCD Plan*, the existing parking garage is a suitable candidate for demolition and replacement. The proposed development is a 35-storey high-rise building with a podium base. The proposed development conserves significant built heritage resources, conforms with the heritage policies of *The London Plan*, and is compliant with the goals, objectives, policies, and guidelines of the *Downtown HCD Plan*. Mitigative measures, recommended by the HIA, should be implemented to ensure that appropriate regard is had for adjacent cultural heritage resources. The Demolition Request for the removal of the existing parking garage and the Heritage Alteration Permit application for the proposed development should be approved with terms and conditions.

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Appendices

Appendix A	Property Location
Appendix B	Images
Appendix C	Drawings – 320 King Street (Zedd Architecture, May 4, 2023) <i>select drawings from Architectural Package-Second Submission SPA</i>
Appendix D	Architectural Package-Second Submission SPA – 320 King Street (Zedd Architecture, May 4, 2023)
Appendix E	Heritage Impact Assessment – 320 King Street (Zelinka Priamo Ltd., November 17, 2022)

Sources

2023, March 23 – Notice of Public Meeting, City of London File Z-9570.

2023, April 26 – Municipal Council Resolution. (3.5/7/PEC). London, ON: Corporation of the City of London. [re: passage of By-law no.Z.-1-233103, Council meeting held on April 25, 2023]

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Appendix A – Property Location

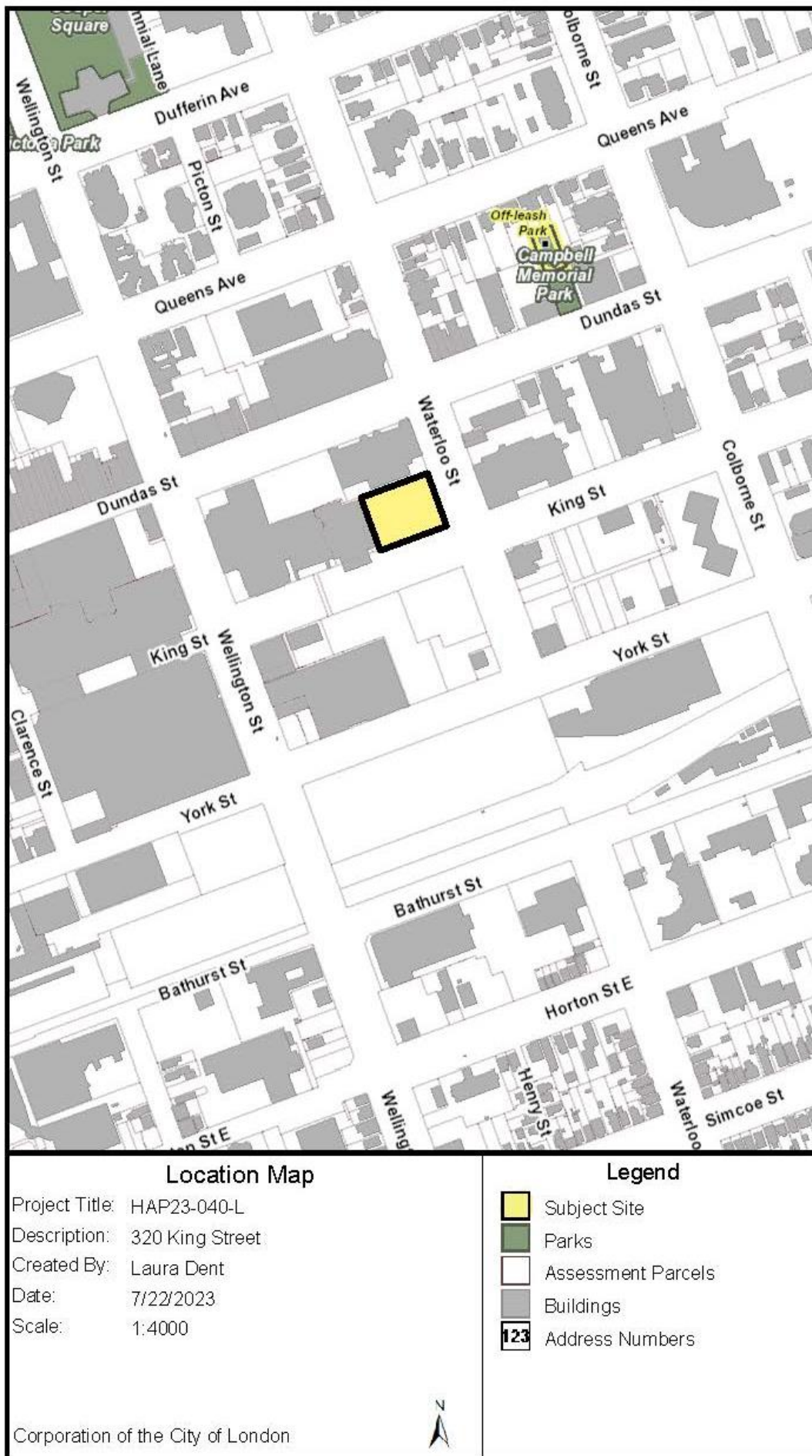


Figure 1: Location Map showing the location of subject property at 320 King Street, located within the Downtown Heritage Conservation District.

Appendix B – Images

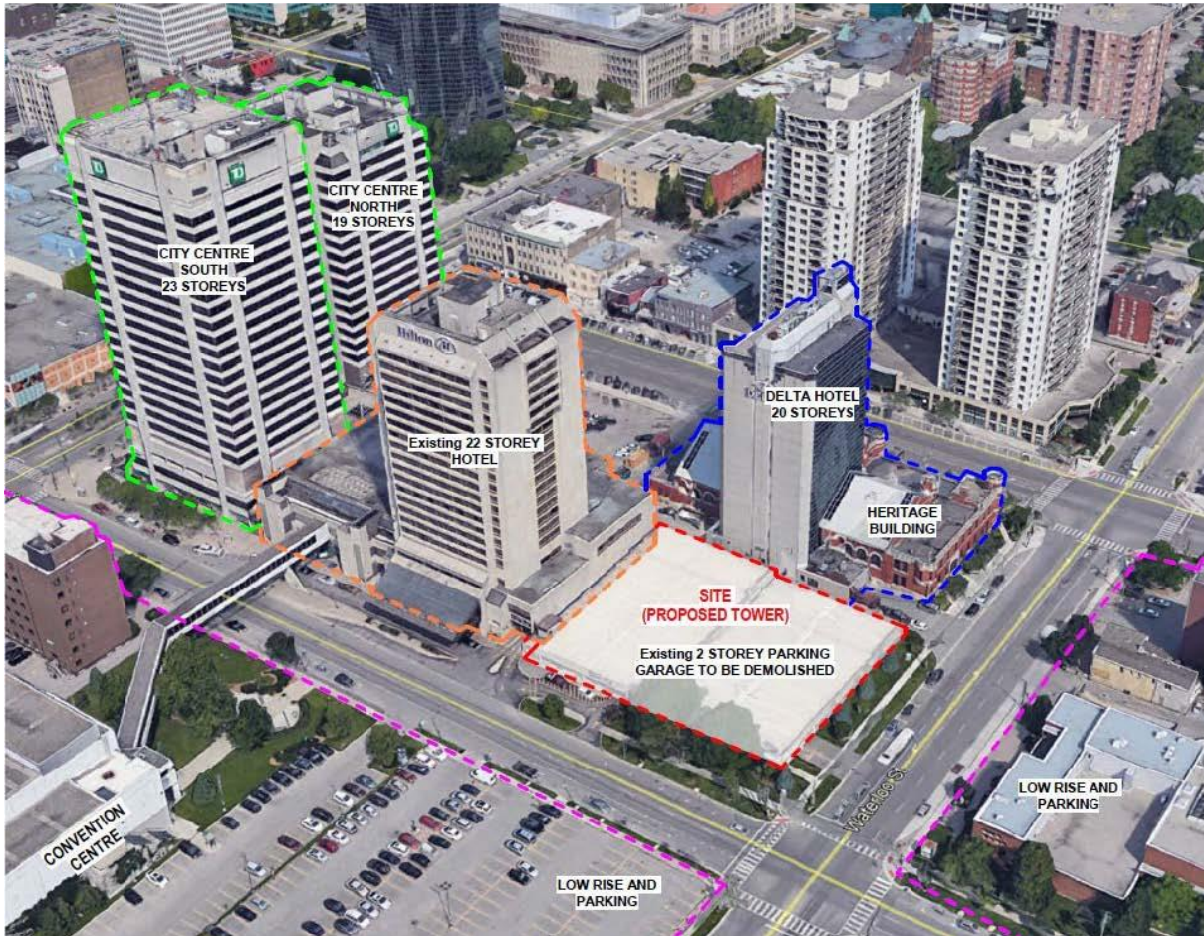


Image 1: Annotated aerial photograph – looking northwest showing the corner of the subject property at 320 King Street with existing parking garage and adjacent properties (Zedd Architecture, Architectural Package – May 4, 2023, from drawing A1.1).



Image 2: View of existing parking garage exit ramp onto Waterloo Street – facing west (L.E. Dent, June 28, 2023).



Image 3: View of existing parking garage showing green buffer and plantings – facing west (L.E. Dent, June 28, 2023).



Image 4: View of existing parking garage showing exit ramp, green buffer, and plantings –facing west (L.E. Dent, June 28, 2023).



Image 5: View of existing parking garage along King Street – facing northwest (L.E. Dent, June 28, 2023).

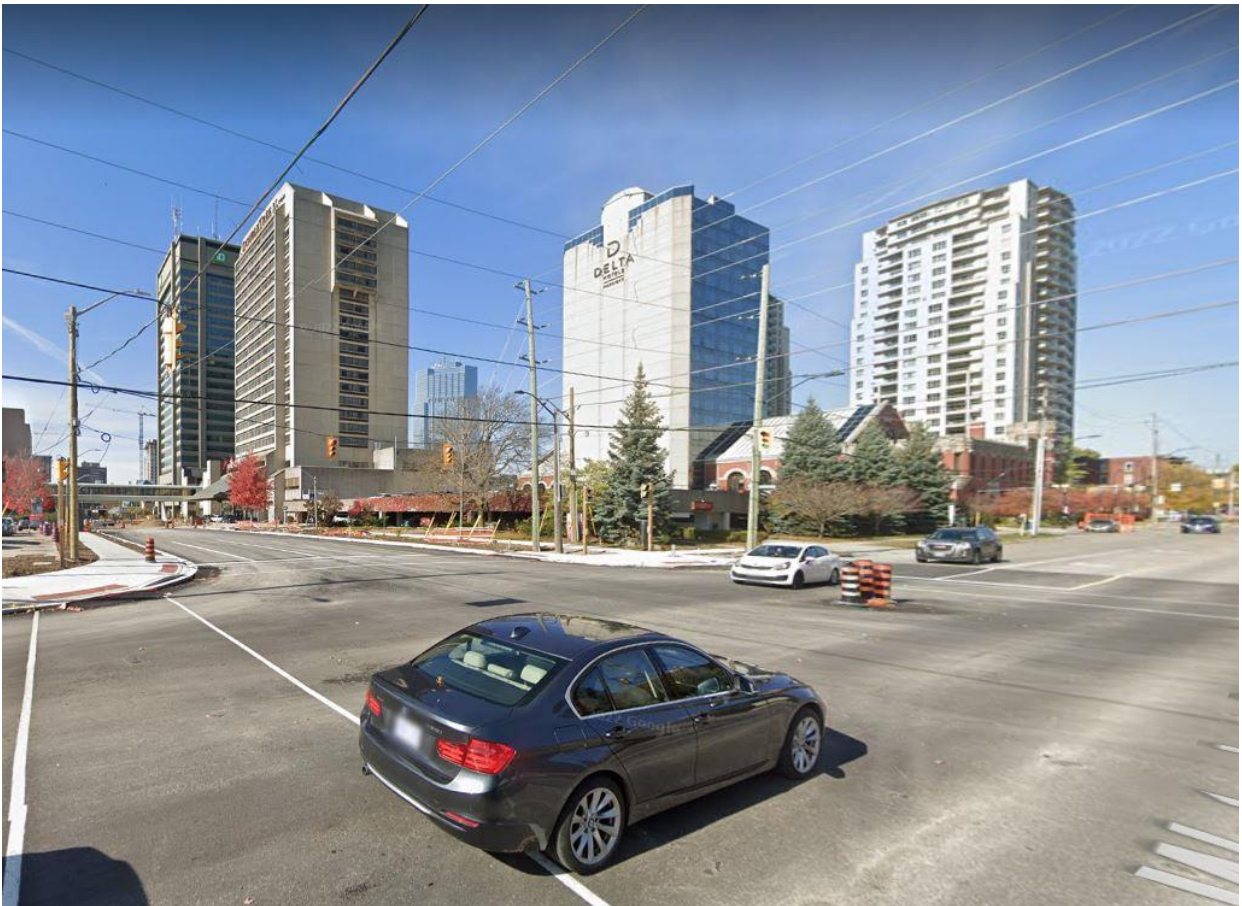


Image 6: View of King Street and Waterloo Street intersection with the existing parking structure at the corner and high-rise buildings including and the Hilton DoubleTree Hotel, Delta Armouries Hotel, and City Place apartment – facing northwest (Google Street View, October 2022 - extracted July 22, 2023).

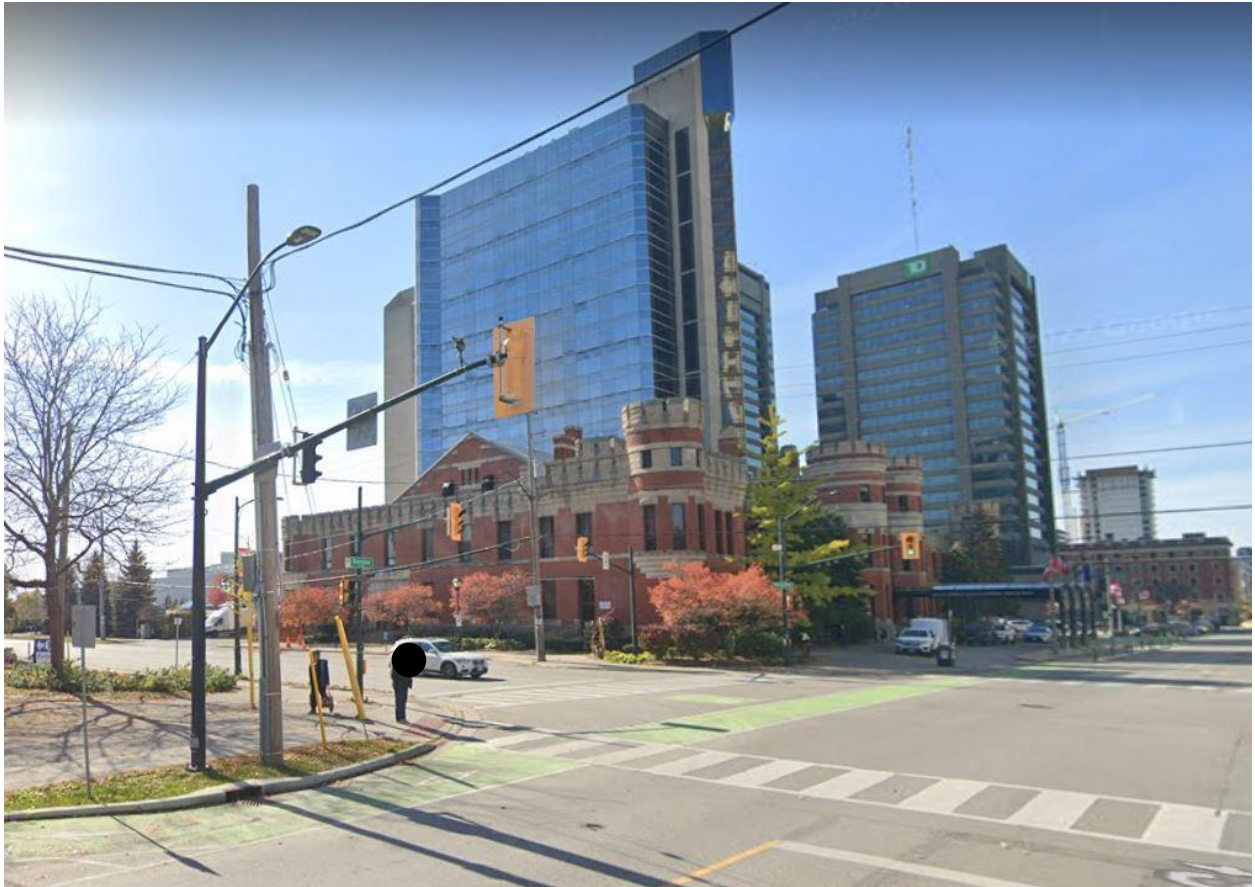


Image 7: View of Dundas and Waterloo Street intersection with the Delta Armouries Hotel in the foreground – facing southwest (Google Street View, October 2022 - extracted July 22, 2023).



Image 8: Conceptual rendering of the proposed development at the Dundas and Waterloo Street intersection showing the building podium and tower, with the Delta Armouries Hotel in the foreground – facing southwest (Zedd Architecture, image from Notice of Public Meeting Z-9570 – March 23, 2023).



Image 9: Conceptual rendering of the proposed development – view of the King Street and Waterloo Street intersection looking northwest (Zedd Architecture, Architectural Package – May 4, 2023, from title page).



Image 10: Conceptual rendering of the proposed development – aerial view of the King Street and Waterloo Street intersection looking northwest (Zelinka Priamo Ltd. Heritage Impact Assessment – November 17, 2022, p14)



Image 11: Conceptual rendering of the proposed development – south elevation, podium level (Zelinka Priamo Ltd. Heritage Impact Assessment – November 17, 2022, p14).



Image 12: Conceptual rendering of the proposed development – east elevation with adjacent Delta Armouries Hotel (Zelinka Priamo Ltd. Heritage Impact Assessment – November 17, 2022, p16).

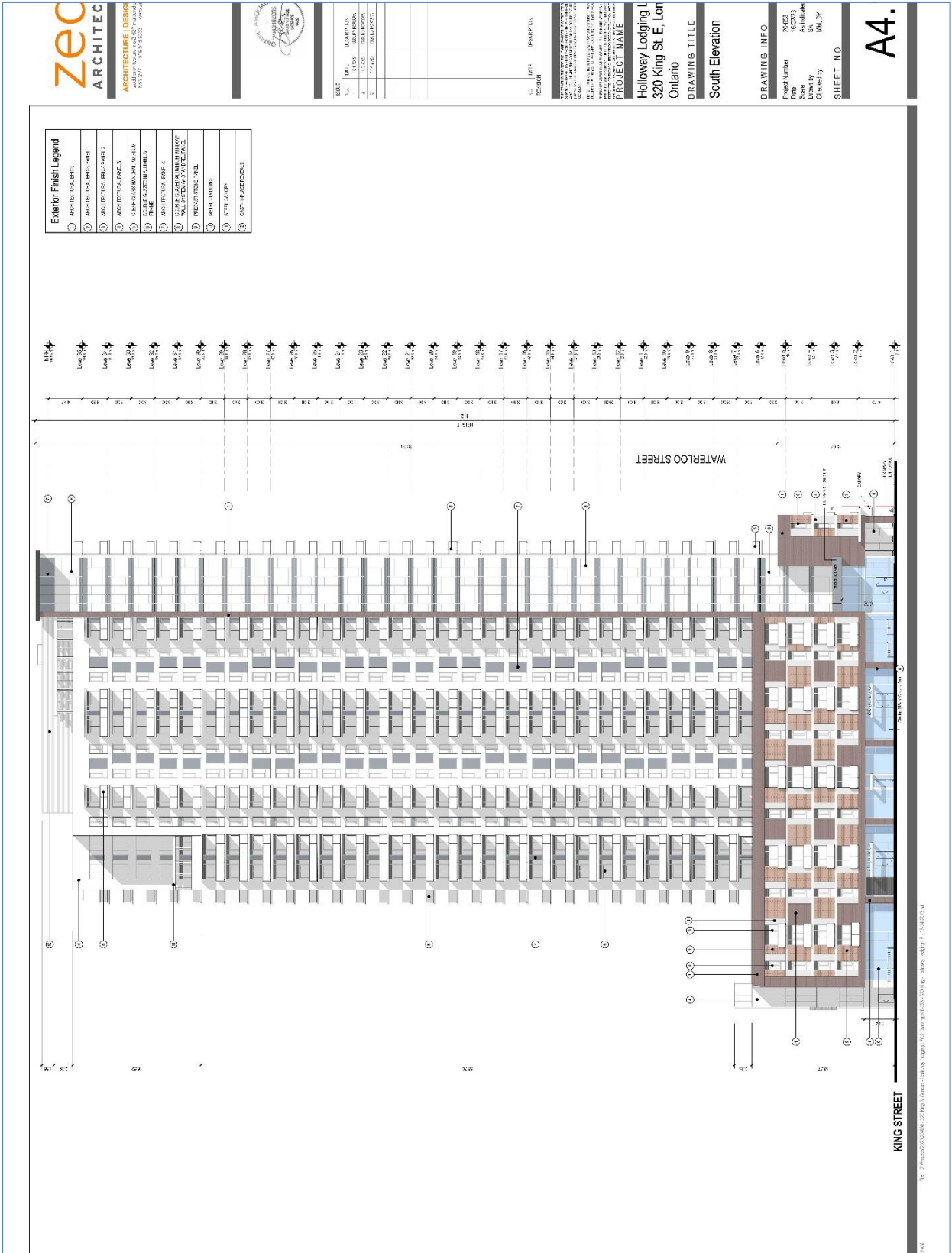


Figure 2: South Elevation (Zedd Architecture, Architectural Package – May 4, 2023, from drawing A4.1).

Appendix D – Architectural Package

Architectural Package-Second Submission SPA – 320 King Street (Zedd Architecture, May 4, 2023) [attached separately]

Appendix E – Heritage Impact Assessment

Heritage Impact Assessment – 320 King Street (Zelinka Priamo Ltd., November 17, 2022) [attached separately]



Holloway Lodging LP

320 King St. E, London,
Ontario

20-058

MAY 04, 2023

zedd
ARCHITECTURE



ARCHITECTURE | DESIGN | PLANNING

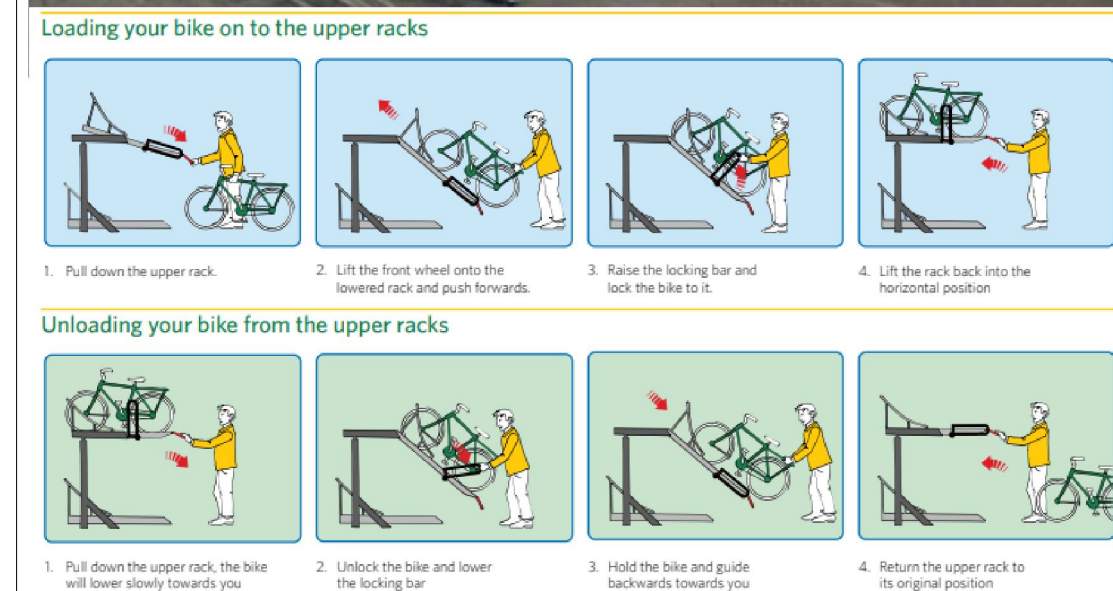
zedd architecture inc Z-627 maitland street london ontario N5Y 2V7 519 518 9333 www.zeddarchitecture.com info@zeddarchitecture.com

Name of Practice: zedd architecture inc. Z - 627 Maitland St. London, Ontario N5Y 2V7		Name of Project: 320King - Holloway Lodging		Location: 320King Street, London	
Ontario's 2012 Building Code Data Matrix Part 3 or 9			OBC Reference		
References are to Division B unless noted [A] for Division A or [C] for Division C.			References are to Division B unless noted [A] for Division A or [C] for Division C.		
1	Project Description:	<input checked="" type="checkbox"/> New <input type="checkbox"/> Addition <input type="checkbox"/> Alteration	<input type="checkbox"/> Part 11	1.1.2. [A]	1.1.2. [A] & 9.10.1.3.
2	Major Occupancy(s): Group E & Group C Residential			3.1.2.1.(1)	9.10.2.
3	Building Area (m ²): Existing	New 2,835.5m ² Total: 2,835.5m ²		1.4.1.2. [A]	1.4.1.2. [A]
4	Gross Area	Existing	New 49,421.78m ² Total: 49,421.78m ²	1.4.1.2. [A]	1.4.1.2. [A]
5	Number of Storeys	Above grade: 35 Below grade: 2		1.4.1.2. [A]&3.2.1.1.	1.4.1.2. [A] & 9.10.4
6	Number of Streets/Fire Fighter Access: 2			3.2.2.10 & 3.2.5	9.10.20
7	Building Classification: Group C, Any Height, Any Area, Sprinklered (3.2.2.42.)			3.2.2.20-83	9.10.2
8	Sprinkler System Proposed	<input checked="" type="checkbox"/> entire building <input type="checkbox"/> selected compartments <input type="checkbox"/> selected floor areas <input type="checkbox"/> basement <input type="checkbox"/> not required	<input checked="" type="checkbox"/> in lieu of roof rating	3.2.2.83 3.2.1.5. 3.2.2.17.	9.10.8.2.
9	Standpipe required	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		3.2.9.	N/A
10	Fire Alarm required	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		3.2.4	9.10.18.
11	Water Service/Supply is Adequate	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		3.2.5.7.	N/A
12	High Building	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		3.2.6.	N/A
13	Construction Restrictions	<input type="checkbox"/> Combustible permitted <input checked="" type="checkbox"/> Non-combustible required	<input type="checkbox"/> Both Actual Construction <input checked="" type="checkbox"/> Non-combustible	3.2.2.20-83	9.10.6.
14	Mezzanine(s) Area m ² : N/A				
15	Occupant load based on	<input checked="" type="checkbox"/> m ² /person <input type="checkbox"/> design of building		3.1.17.	9.9.1.3.
Level P2: Other(Storage)		Load = 46.0 m ² /person @ 127.5m ²	= 3 persons		
Occupancy Group F3		Load = 46.0 m ² /person @ 2297m ²	= 50 persons		
Level P1: Other(Storage)		Load = 46.0 m ² /person @ 127.5m ²	= 3 persons		
Occupancy Group F3		Load = 46.0 m ² /person @ 2297m ²	= 50 persons		
Level 1: Occupancy Group E (Retail)		Load = 3.7 m ² /person @ 475 m ²	= 129 persons		
Occupancy Group F3		Load = 46.0 m ² /person @ 1332m ²	= 29 persons		
Level 2: Occupancy Group C Other(Storage)		Load = 2 persons per bedroom Load = 46.0 m ² /person @ 286m ²	= 18 persons = 7 persons		
Occupancy Group F3		Load = 46.0 m ² /person @ 1254m ²	= 28 persons		
Level 3-4: Occupancy Group C Other(Storage)		Load = 2 persons per bedroom Load = 46.0 m ² /person @ 325m ²	= 20 persons = 7 persons		
Occupancy Group F3		Load = 46.0 m ² /person @ 1336m ²	= 29 persons		
TOTAL			= 112 persons		
Level 5: Occupancy Group C Other(Storage)		Load = 2 persons per bedroom Load = 46.0 m ² /person @ 193m ²	= 10 persons = 4 persons		
Occupancy Group F3		Load = 46.0 m ² /person @ 1252m ²	= 33 persons		
Occupancy Group A (Terrace)		Load = 225 m ² (by design)	= (25-30) = 55 persons		
Occupancy Group A (Terrace)		Load = 9.3 m ² /person @ 343m ²	= 36 persons		
Level 6: Occupancy Group C		Load = 2 persons per bedroom	= 34 persons		
Level 7-29: Occupancy Group C		Load = 2 persons per bedroom	= 36 persons		
TOTAL			= 828 persons		
Level 30-32: Occupancy Group C		Load = 2 persons per bedroom	= 34 persons		
TOTAL			= 102 persons		
Level 33-34: Occupancy Group C		Load = 2 persons per bedroom	= 32 persons		
TOTAL			= 64 persons		
Level 35: Occupancy Group A (Amenity)		Load = 111m ² (by design)	= 35 persons		
Occupancy Group A (Terrace)		Load = 9.3 m ² /person @ 161m ²	= 18 persons		
TOTAL OCCUPANCY = 433 UNITS			= 1,659 persons		
16	Barrier-free Design	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Explain)		3.8.	9.5.2.
17	Hazardous Substances	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		3.3.1.2. & 3.3.1.19.	9.10.1.3.(4)
18	Required Fire Resistance Rating (FRR)	Horizontal Assemblies: Listed Design No. or Description (SB-2 or SB-3) Roof: NR Mezzanine: N/A FRR of Supporting Members: Listed Design No. or Description (SB-2 or SB-3) Floors: 2 Hours Roof: NR Mezzanine: N/A		3.2.2.20-83 & 3.2.1.4.	9.10.8. & 9.10.9.
19	Spatial Separation - Construction of Exterior Walls	Area of EBF (m ²) LD (m) LH or HL Permitted Max. % of Openings Proposed % of Openings FRR (hours) Listed Design or Description	Comb. Noncomb. Comb. Noncomb.	3.2.3.	9.10.14.
North (Podium)		1069 0.97 N/A 11 8.3%	1	SB2	x x - x
North (Tower)		3814 24.6 N/A 100 55%	N/A	-	x x - x
South (Podium)		1102 25.4 N/A 100 44%	N/A	-	x x - x
South (Tower)		3800 >25.4 N/A 100 61%	N/A	-	x x - x
East (Podium)		668 25.2 N/A 100 36%	N/A	-	x x - x
East (Tower)		2880 >25.2 N/A 100 50%	N/A	-	x x - x
West (Podium)		899 2.2 N/A 17 9.6%	1	SB2	x x - x
West (Tower)		2726 14.8 N/A 100 27%	N/A	-	x x - x
(Additional wall areas continued below)					
20	Plumbing Fixture Requirements				
Male/Female Count @ 50% / 50% , except as noted otherwise		Occupant Load	BC Table Number	Fixtures Required	Fixtures Provided
Group C: Occupancy		1,659	3.7.4.5	Min. 1 per Unit	1 to 2 Per Unit
21	Energy Efficiency: Compliance Path: Prescriptive (2013 ANSI/ASHRAE/IES 90.1 and Chapter 2, OBC SB-10)				
22	Code Compliance Notes				

Building 2 Stats									
Floor Level	Parking Count	Amenity (SqM)2	Retail / Commercial Area (SqM)2	Floor Area (SqM) 2	Total Unit Number	1 Bed	1 Bed + Den	2 Bed	Bach.
-1 (P1 & P2)	134			2919					
1	31		456	2835					
2	36			2894	9	7	2		
3-4	74			2894	20	8	1		1
5	36	245		2548	5	3	2		
6				1013	14	11		3	
7-29				1013	322	10	4		4
30-32				968	39	9		4	
33-34				921	24	8		4	
35		111	463	463	433	56	5	15	1

Site Development Stats		
320 KING ST. E. LONDON, ONTARIO (NEW TOWER)		
ITEM	REQUIRED/ ALLOWED	PROPOSED
1 ZONE - PROPOSED BUILDING PERMITTED USES	Apartment Buildings	Apartment Buildings
2 LOT AREA (MINIMUM)		3236.3 SQM (0.32ha)
3 LOT FRONTAGE (MINIMUM)	3.0m	64.1m
4 FRONT YARD SETBACK (KING ST. MIN. (MINIMUM)	0.0m	0.90m
4a TOWER - FRONT STEP BACK (KING ST.)		5.11m
5 REAR YARD DEPTH MIN. (MINIMUM)	0.0m	0.97m
5a TOWER - REAR STEP BACK		12.25m
6 EXTERIOR SIDEYARD SETBACK (WATERLOO ST.) MIN. (MINIMUM)	0.0m	0.96m
6a TOWER - EXTERIOR SIDEYARD STEP BACK		5.0m
7 INTERIOR SIDEYARD DEPTH MIN. (MINIMUM)	0.0m	0.0m
7a TOWER - INTERIOR SIDEYARD STEP BACK		15.05m
8 LANDSCAPE OPEN SPACE (% MINIMUM)	5%	3%
9 COVERAGE (% MAXIMUM)	95%	95%
10 HEIGHT (M MAXIMUM)	90m	112m
11 DENSITY (UPH MAXIMUM)	595UPH	1338UPH
13 GROSS FLOOR AREA RETAIL	THE LESSER OF: 20% OR 5000m ²	468 m ²
14 COMMERCIAL PARKING	5:18	6 spaces
15 RESIDENTIAL PARKING	1:0.71	305 spaces
16 VISITOR PARKING	1:10	44 spaces (Incl. total)
17 B.F. PARKING	2+2% = 8.2	9 spaces (Incl. total)
18 TOTAL PROPOSED PARKING	1:0.71	311 spaces
19 BICYCLE PARKING	0.9 per unit (Long Term)	390 spaces (Above grade)
20 BICYCLE PARKING	0.1 per unit (Short Term)	44 (On grade)

LONG-TERM BICYCLE STORAGE AREA DETAILS

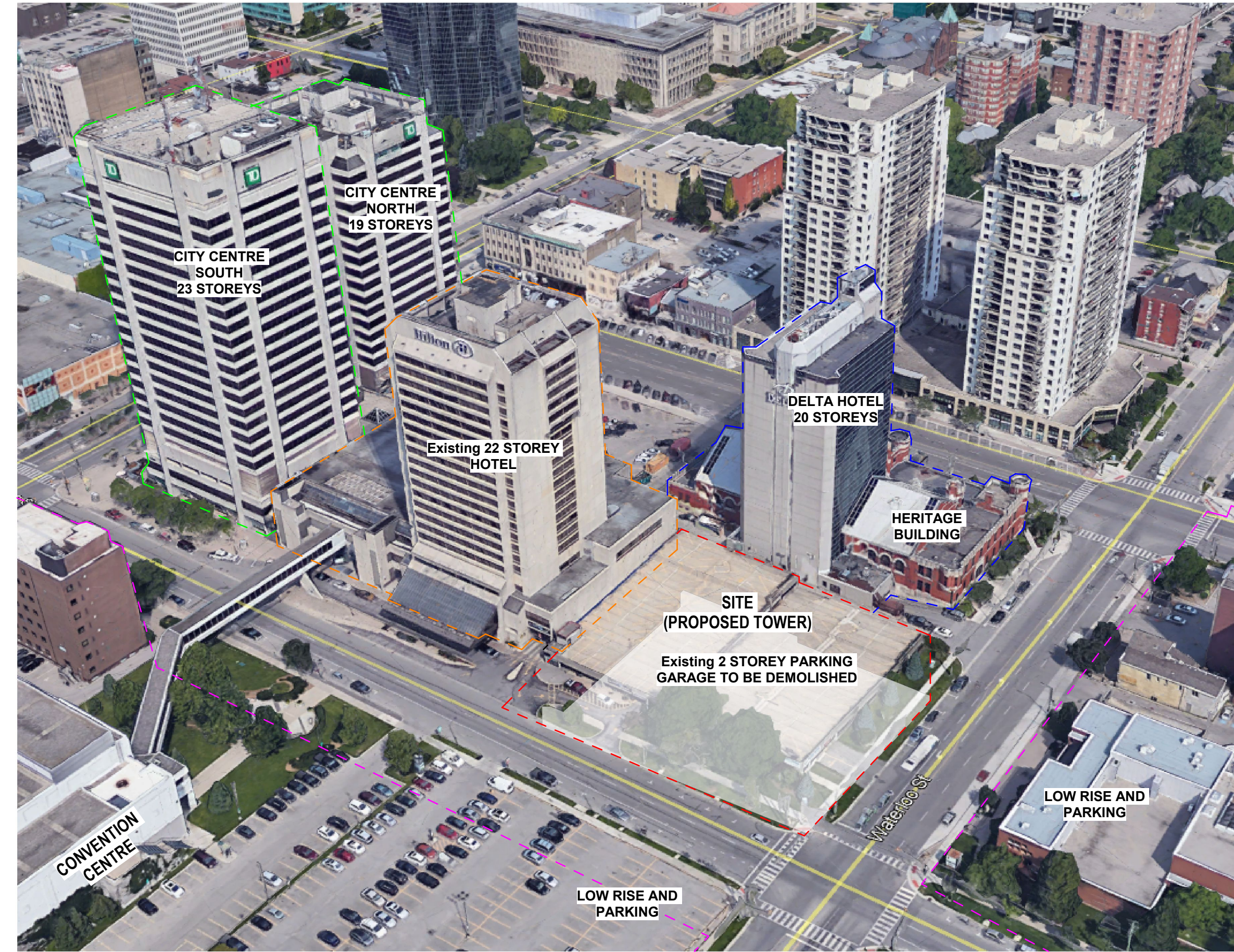


TOTAL LOCKERS = 194
TOTAL BICYCLE PARKING = 387 spaces
TOTAL EXTERNAL BICYCLE PARKING = 44 spaces

B.F. UNITS 15%
TOTAL 65 B.F. UNITS

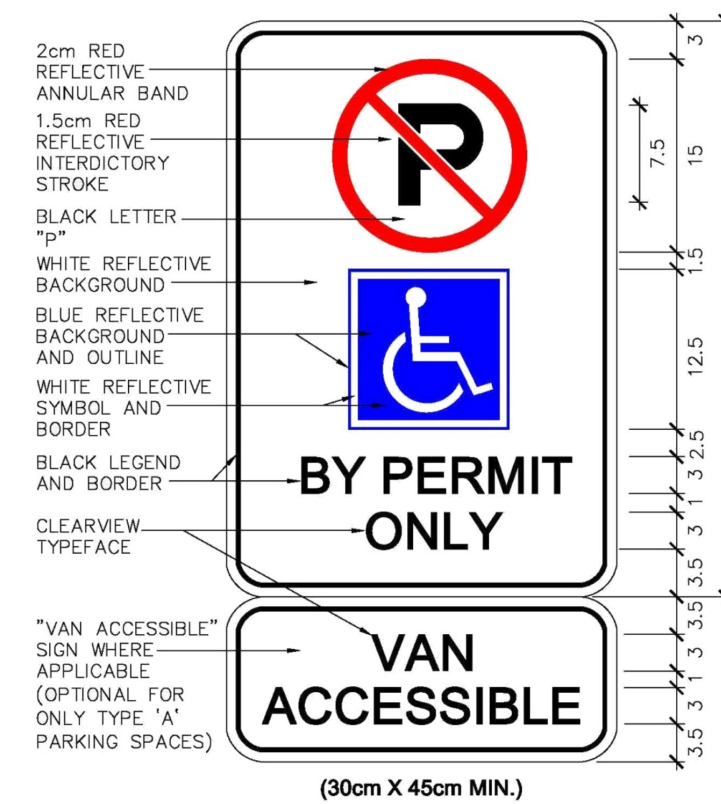
PARKING TYPE CALC:
TYPE A: 5 spots
TYPE B: 4 spots

GARBAGE CALC:
27 RECYCLING CART
15 GARBAGE BINS



SITE CONTEXT

FIGURE 7.3 ACCESSIBLE PARKING SIGN



NOTE: SIGN ON A POST TO BE AT LEAST 1.5M ABOVE GRADE AND NOT MORE THAN 2.0M WHEN MEASURING FROM GRADE TO THE CENTRE OF THE SIGN.

FIGURE 7.4 INTERNATIONAL SYMBOL OF ACCESS (OPTIONAL ON THE SURFACE OF THE PARKING SPACE)

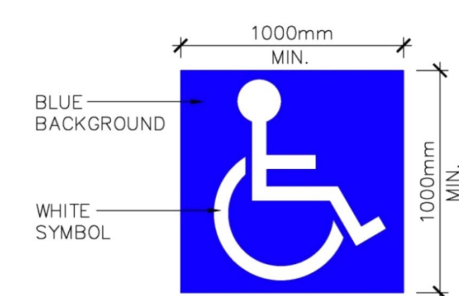
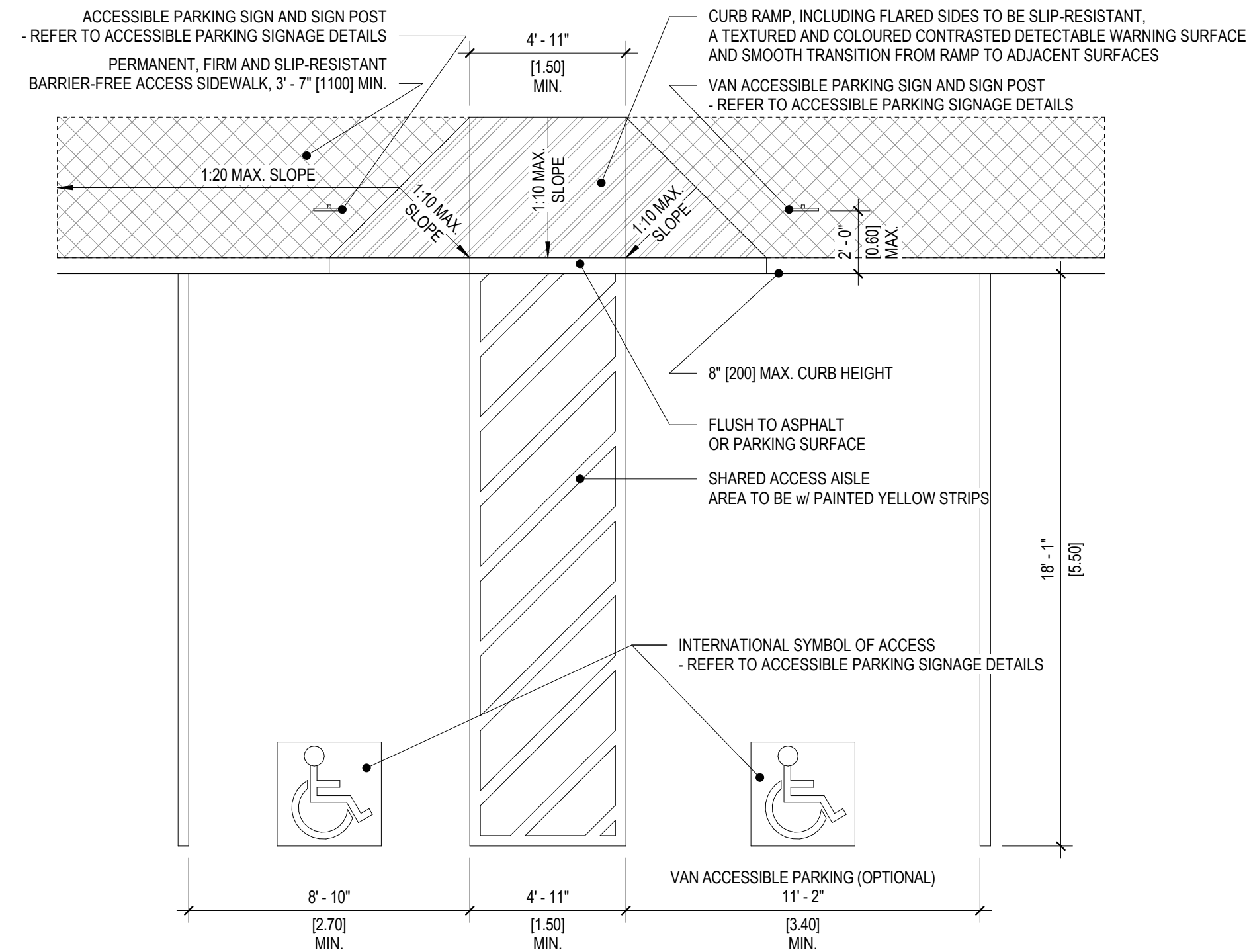


FIGURE 7.5 NO STOPPING SIGN



Rb-55 30 cm x 30 cm
Rb-155 60 cm x 60 cm
Font N/A
Colour Interactivity Symbol - Red Reflective
Legend & Border - Black
Background - White Reflective



B-F Curb Ramp



ISSUE		
NO.	DATE	DESCRIPTION
1	10.1.2023	ISSUED FOR SPA
2	30.1.2023	ISSUED FOR SPA
3	16.2.2023	ISSUED FOR SPA
4	24.03.2023	UPDATED FOR SPA
5	13.04.2023	UPDATED FOR SPA
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PROJECT NAME
Holloway Lodging LP
320 King St. E, London, Ontario
DRAWING TITLE
Matrix and Statistics

DRAWING INFO.
Project Number 20-058
Date 13/04/23
Scale As indicated
Drawn by SA
Checked by Checker

SHEET NO.
A1.1

Site Legend	
Symbol	Description
---	PROPERTY LINE
---	SETBACK LINE REFER TO SITE DEVELOPMENT STATISTICS
▲	PRIMARY ENTRANCE REFER TO SITE DEVELOPMENT STATISTICS
▲	"B.F." DENOTES BARRIER FREE ENTRANCE "F.F.E." DENOTES FIRE FIGHTER ENTRANCE
△	SECONDARY ENTRANCE
▨	FIRE ROUTE. REFER TO NOTE 1.
F.R.	FIRE ROUTE SIGN
▨	BARRIER-FREE PATH OF TRAVEL EXT. WALKWAY. REFER TO NOTE 2.
♿	ACCESSIBLE PARKING SIGN
⊕	CATCH BASIN REFER TO CIVIL
○	MAN HOLE REFER TO CIVIL
⊕	FIRE HYDRANT REFER TO CIVIL
⊕	WATER METER REFER TO CIVIL AND PLUMBING
⊕	GAS METER REFER TO CIVIL AND PLUMBING
⊕	LIGHT FIXTURE REFER TO ELECTRICAL DRAWINGS
⊕	LIGHT FIXTURE REFER TO ELECTRICAL DRAWINGS
⊕	GROUND MOUNTED LIGHT FIXTURE REFER TO ELECTRICAL DRAWINGS
⊕	SOFFIT LIGHT FIXTURE REFER TO ELECTRICAL DRAWINGS
⊕	WALL MOUNTED LIGHT FIXTURE REFER TO ELECTRICAL DRAWINGS
T	TACTILE ATTENTION SURFACE REFER TO CIVIL DRAWING

- NOTE:**
- HARD SURFACE LEADING FROM BARRIER FREE CURB RAMP TO B.F. ENTRANCE TO HAVE DISTINCT COLOUR AND TEXTURE REFER TO LANDSCAPE
 - LANDSCAPE SHOWN FOR REFERENCE ONLY, REFER TO LANDSCAPE
 - FOR SPOT ELEVATIONS AND DRAINAGE SLOPES REFER TO CIVIL GRADING PLANS
 - SANITARY STORM, MAN HOLE AND CATCH BASINS ARE SHOWN FOR COORDINATION PURPOSES REFER CIVIL DRAWINGS
 - ALL CLEARANCES TO ELECTRICAL CONDUCTORS AS SET OUT IN THE 2012 OBC DIV B-3.1.19.1 ELECTRICAL CONDUCTOR CLEARANCES TO BUILDINGS SHALL BE MAINTAINED.
 - FOR LIGHT STANDS REFER TO LANDSCAPE AND ELECTRICAL DRAWINGS
 - TRANSFORMER SHOWN FOR REFERENCE ONLY, REFER TO ELECTRICAL FOR SIZE
 - LOCATION OF BICYCLE RACK - (8 SHORT-TERM REQ.). REFER TO LANDSCAPE FOR DETAILS



ISSUE		
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Holloway Lodging LP
320 King St. E, London,
Ontario

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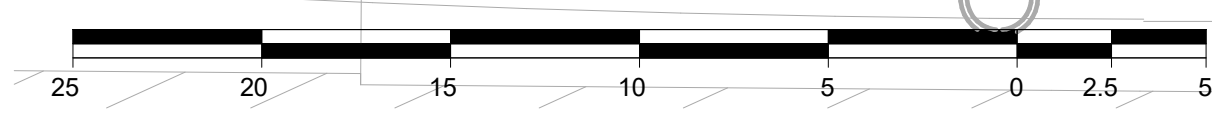
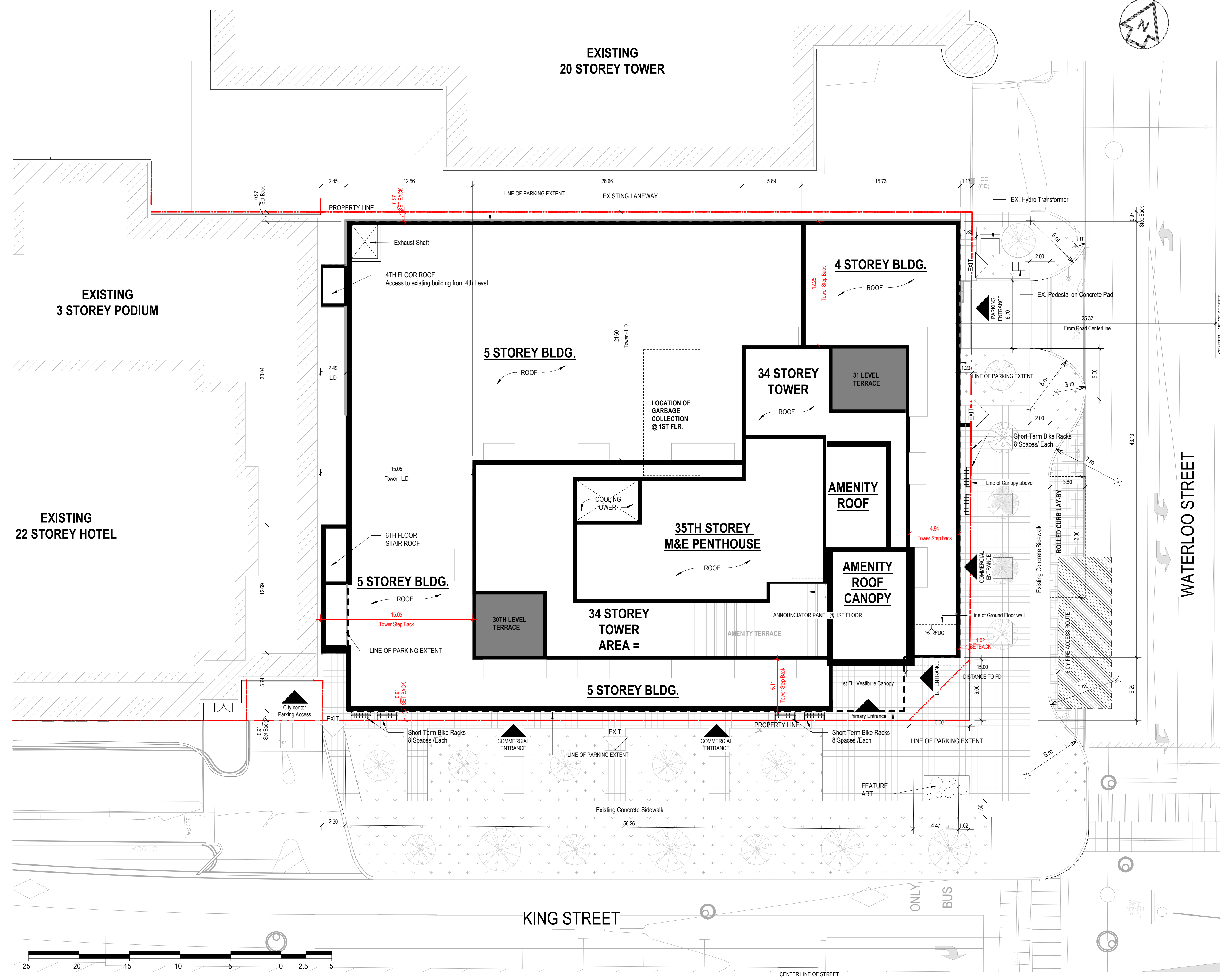
Site Plan

DRAWING INFO.

Project Number 20-058
Date 13/04/23
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Checked by MM, DY

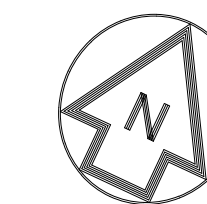
SHEET NO.

A1.2



20 Site Plan Approval
1:200

1



ISSUE		
NO.	DATE	DESCRIPTION
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3	13.04.2023	UPDATED FOR SPA
NO.	DATE	DESCRIPTION
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PROJECT NAME

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320 King St. E, London,
Ontario

DRAWING TITLE

Parking Level Floor Plans (P1 & P2)

DRAWING INFO.

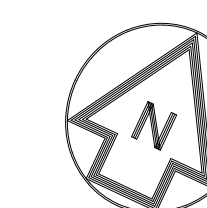
Project Number 20-058
Date 13/04/23
Scale 1:120
Drawn by SA
Checked by MM, DY

SHEET NO.

A2.1



Level P1 & P2
1:120 1



ISSUE NO.	DATE	DESCRIPTION
1	10.1.2023	ISSUED FOR SPA
2	30.1.2023	ISSUED FOR SPA
3	16.2.2023	ISSUED FOR SPA
4	24.03.2023	UPDATED FOR SPA
5	13.04.2023	UPDATED FOR SPA
6	01.05.2023	UPDATED FOR SPA

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PROJECT NAME

Holloway Lodging LP
320 King St. E, London,
Ontario

DRAWING TITLE

Ground Floor Plan

DRAWING INFO.

Project Number 20-058
Date 13/04/23
Scale 1:120
Drawn by SA
Checked by MM, DY

SHEET NO.

A2.2



Ground Floor Plan 1
1:120

Heritage Impact Assessment

Royal Host GP Inc. & Holloway Lodging

320 King Street

City of London



November 17, 2022



EXECUTIVE SUMMARY

Zelinka Priamo Ltd. was retained by Royal Host GP Inc. and Holloway Lodging to prepare a Heritage Impact Assessment (HIA) as a background document for the proposed redevelopment of the lands known municipally as 300-320 King Street (hereinafter referred to as the “subject lands”) for a 35-storey, 435-unit high-rise residential development. The proposed development is to be located on lands currently used for a parking structure. The existing hotel on the subject lands is to remain. This HIA involves a built heritage assessment to assist the City of London (the City) with its decision-making process regarding rezoning approval.

The purpose of this HIA is to determine if the identified built heritage resources will be impacted by the proposed development by responding to provincial and municipal policy requirements regarding the conservation of built heritage resources in the land use planning process. Consideration must be given to the conservation of heritage resources where a development or site alteration is proposed within or adjacent to a protected heritage property.

This report will identify and evaluate the heritage value of those properties adjacent to the proposed development; identify potential impacts to the identified heritage resources; and, propose appropriate mitigation measures and recommendations for minimizing and avoiding potential negative impacts of the identified heritage resources.

The HIA determined that there are potential indirect impacts to adjacent properties resulting in vibration impacts from construction activities. Additionally, direct impacts are anticipated within a protected heritage property due to demolition activities. Given the presence of cultural heritage resources which have the potential to be affected by the proposed development, the following mitigation measures have been recommended:

- Appropriate construction methodologies to be prepared, if required, and careful adherence to such methodologies to prevent any undue impacts to adjacent identified cultural heritage resources as per the City’s Development and Construction Standards; and,
- If required, monitoring for possible construction/demolition impacts such as vibrations would occur during the construction phase of the proposed development.

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1.0 INTRODUCTION

Zelinka Priamo Ltd. was retained by Royal Host GP Inc. and Holloway Lodging to prepare a Heritage Impact Assessment (HIA) as a background document for the proposed redevelopment of the lands known municipally as 300-320 King Street (hereinafter referred to as the “subject lands”) for a 35-storey, 435-unit high-rise residential development. The proposed development is to be located on lands currently used for a parking structure. The existing hotel on the subject lands is to remain. This HIA involves a built heritage assessment to assist the City of London (the City) with its decision-making process regarding rezoning approval.

1.1 Purpose

The purpose of this HIA is to determine if the identified built heritage resources will be impacted by the proposed development by responding to provincial and municipal policy requirements regarding the conservation of built heritage resources in the land use planning process. Consideration must be given to the conservation of heritage resources where a development or site alteration is proposed within or adjacent to a protected heritage property.

This report will identify and evaluate the heritage value of those properties adjacent to the proposed development; identify potential impacts to the identified heritage resources; and, propose appropriate mitigation measures and recommendations for minimizing and avoiding potential negative impacts of the identified heritage resources.

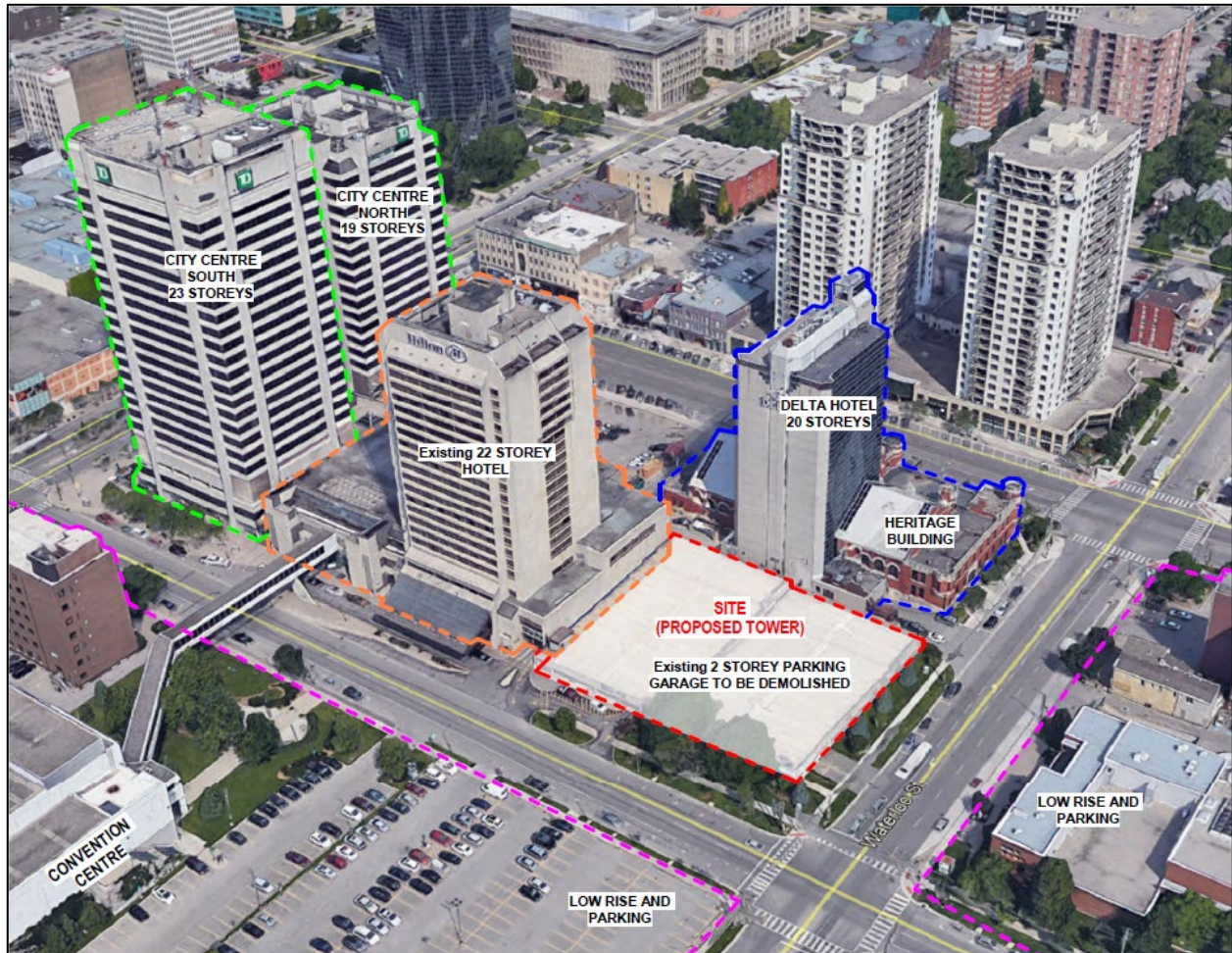
1.2 Subject Lands

The subject lands are located at the northwest corner of the King Street and Waterloo Street intersection. The subject lands consist of multiple irregularly-shaped parcels, including a portion of the lands known municipally as 275 Dundas Street; the entirety of 300 King Street; and the entirety of 320 King Street. The irregularly-shaped lands have an area of approximately 0.73ha with frontages of approximately 105m along King Street and approximately 50m along Waterloo Street. The subject lands abut the Delta Armouries hotel and a parking lot to the north; Waterloo Street to the east; King Street to the south; and, the City Centre (TD) towers to the west (Image 1). RBC Place is located opposite the subject lands on the south side of King Street; and, the Centre Branch YMCA facility is located opposite the subject lands on the east side of Waterloo Street.

The subject lands are currently occupied by an existing 22-storey hotel building and an existing parking structure, which is wholly located on 320 King Street. A Site Plan Approval application is currently being processed to permit the conversion of part, or all, of the hotel units to residential units.

The subject lands are generally flat in topography. Several street trees are located around the perimeter of the existing parking structure. Existing vehicular access is provided along King Street, leading to a lay-by in front of the existing hotel building, to the underground parking ramp, and to the existing parking structure. The vehicular portion of the King Street right-of-way consists

Image 1 – Subject lands



of two, one-way eastbound lanes, with turning lanes where necessary. A grassed landscaped strip provides a small buffer between the pedestrian sidewalk, located on both sides of the King Street right-of-way, and the outermost vehicular lane. Signalized intersections at both Wellington Street/King Street and Waterloo Street/King Street control pedestrian and vehicular traffic.

300 King Street and 320 King Street were added to the *City of London Register of Cultural Heritage Resources* by Municipal Council on June 27, 2013. Both of these properties are also located within the Downtown London Heritage Conservation District.

300 King Street (Image 2), known as the Hilton Double Tree Hotel, is a designated heritage property under Part V of the *Ontario Heritage Act*. The Hotel is a 22-storey structure built in 1978 composed of recessed glass with room windows alternating with bands of precast materials on the north and south elevations. The east and west elevations are composed of a centre strip of windows set in a largely concrete wall. 300 King Street is directly adjacent to the proposed development to the west.

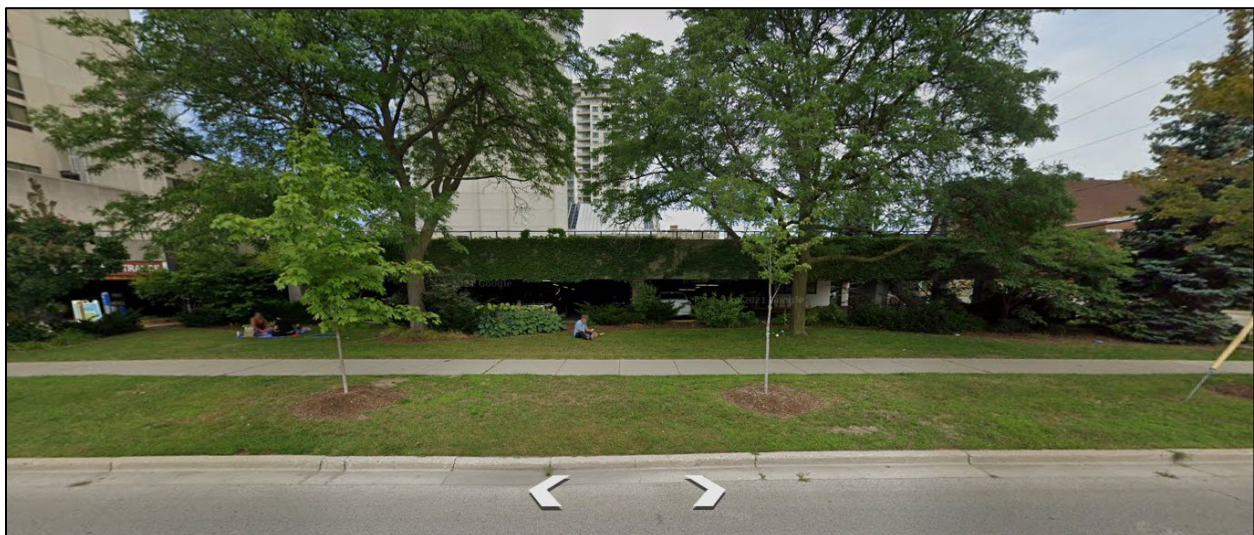
320 King Street (Image 3) is a designated heritage property under Part V of the *Ontario Heritage Act* and is the site of the proposed development, as shown in Image 1. The property consists of a 2-level concrete parking structure which is to be demolished as part of the proposed

development. The property has an “I (Infill)” assignment within the Downtown London HCD, meaning it is a structure and/or site with no identifiable heritage characteristics but, their location as part of the streetscape and/or proximity to other heritage structures deems them integral to the district. The property is identified as having a “ii – Commercial” landscape due to the development of lots built out to the front and side lot lines, thereby creating a continuous street wall with adjacent properties. The property is described as an “empty lot” within the Downtown London HCD with no character defining elements listed and is not assigned a ranking, meaning a heritage alteration permit will not be required and demolition/replacement will be subject to guidelines for new development only (City of London, 2012).

Image 2 – 300 King Street (Hilton Double Tree Hotel)



Image 3 – 320 King Street (existing parking structure)



27, 2013. Both of these properties are also located within the Downtown London Heritage Conservation District.

362 Waterloo Street (Image 7), known as Donohue Funeral Home, is a listed heritage property occupied by a 2-storey red brick building with an unknown building date. 362 Waterloo Street is located at the southeast corner of the King Street and Waterloo Street intersection, opposite the subject lands. This property was added to the *Register* by Municipal Council on March 27, 2018.

Image 5 – 325 Dundas Street (Delta London Armouries Hotel)



Image 6 – 275 Dundas Street (City Centre towers / Canada Trust towers)



Image 7 – 362 Waterloo Street (Donohue Funeral Home)



2.0 BUILT HERITAGE RESOURCE ASSESSMENT CONTEXT

2.1 Policy Framework

2.1.1 *The Planning Act*

The *Planning Act* is provincial legislation that provides a framework for land use planning in Ontario. One of the general purposes of the *Planning Act* is to integrate matters of provincial interest in provincial and municipal planning decisions. Part I of the *Planning Act* identifies that the Minister, municipal councils, local boards, planning boards, and the Ontario Land Tribunal shall have regard to matters of provincial interest, such as:

(d) the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest

2.1.2 *The Provincial Policy Statement, 2020*

The *Provincial Policy Statement (PPS)*, issued under the authority of Section 3 of the *Planning Act* and updated in 2020, provides policy direction on matters of provincial interest related to land use planning in order to ensure efficient development and protection of natural resources. All planning applications required to be consistent with these policies. The PPS has several provisions relating to heritage conservation.

The relevant policies for the conservation of cultural heritage features are contained in Section 2 – Wise Use and Management of Resources, wherein Subsection 2.6 – Cultural Heritage and Archaeological Resources, states the following provisions:

2.6.1 Significant built heritage resources and significant cultural heritage landscapes shall be conserved.

2.6.3 Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property except 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.

Under the PPS definition, 'built heritage resource' means:

A building, structure, monument, installation or any manufactured or constructed part or remnant that contributes to a property's cultural heritage value or interest as identified by a community, including an Indigenous community. Built heritage resources are located on property that may be designated under Parts IV or V of the Ontario Heritage Act, or that may be included on local, provincial, federal and/or international registers.

Under the PPS definition, 'conserved' means:

The identification, protection, management and use of built heritage resources, cultural heritage landscapes and archaeological resources in a manner that ensures their cultural heritage value or interest is retained. This may be achieved by the implementation of recommendations set out in a conservation plan, archaeological assessment, and/or heritage impact assessment that has been approved, accepted or adopted by the relevant planning authority and/or decision-maker. Mitigative measures and/or alternative development approaches can be included in these plans and assessments.

Under the PPS definition, 'significant' in regards to cultural heritage and archaeology means:

Resources that have been determined to have cultural heritage value or interest. Processes and criteria for determining cultural heritage value or interest are established by the Province under the authority of the Ontario Heritage Act.

2.1.3 The London Plan

The properties at 325 Dundas Street and 275 Dundas Street are designated heritage properties on the *City of London Register of Cultural Heritage Resources*, and the property at 362 Waterloo Street is a heritage listed property on the *Register*. The City's Official Plan, *The London Plan*, sets out the following policy with regard to development within or adjacent to designated and listed heritage properties:

586_The City shall not permit development and site alteration on adjacent lands to heritage designated properties or properties listed on the Register except where the proposed development and site alteration has been evaluated and it has been demonstrated that the heritage attributes of the heritage designated properties or properties listed on the Register will be conserved.

The London Plan defines adjacency as:

"sites that are contiguous; sites that are directly opposite a cultural heritage resource separated by a laneway, easement, right-of-way, or street; or sites which a proposed development or site alteration has the potential to impact identified visual character, streetscapes or public views as defined within a statement explaining the cultural heritage value or interest of a cultural heritage resource"

The following general objectives from *The London Plan* regarding cultural heritage resources also apply:

554_In all of the planning and development we do, and the initiatives we take as a municipality we will:

1. Promote, celebrate, and raise awareness and appreciation of London's cultural heritage resources.

2. Conserve London's cultural heritage resources so they can be passed on to our future generations.
3. Ensure that new development and public works are undertaken to enhance and be sensitive to our cultural heritage resources.

Under *The London Plan* definition, 'cultural heritage resource' means:

A human work or a place that gives evidence of human activity or has spiritual or cultural meaning or value, and which has been determined to have historic value. Cultural heritage resources include both the physical and intangible resources, properties protected under the Ontario Heritage Act, built heritage resources, cultural heritage landscapes, archaeological resources, paleontological resources and both documentary and material heritage.

The following design objective from *The London Plan* is applicable:

565_ New development, redevelopment, and all civic works and projects on and adjacent to heritage designated properties and properties listed on the Register will be designed to protect the heritage attributes and character of those resources, to minimize visual and physical impact on these resources. A heritage impact assessment will be required for new development on and adjacent to heritage designated properties and properties listed on the Register to assess potential impacts and explore alternative development approaches and mitigation measures to address any impact to the cultural heritage resource and its heritage attributes.

2.1.4 Downtown London Heritage Conservation District Plan

The proposed development and part of the study area reside in within the Downtown London Heritage Conservation District. Therefore, the guidelines of the Downtown London Heritage Conservation District Plan are applicable. The purpose of the Plan is stated below.

The purpose of this Heritage Conservation District Plan is to establish a framework by which the heritage attributes of the Downtown can be protected, managed and enhanced as this area continues to evolve and change over time. It will provide property owners, business owners, contractors, and other Downtown stakeholders with clear guidance regarding appropriate conservation, restoration and alteration activities and assist municipal staff and Council in reviewing and making decisions on building permits and development applications within the district.

The intent of the Plan is to assist in the protection and conservation of the unique heritage attributes and character of London's Downtown. The Plan provides guidelines for new construction to ensure the conservation of character-defining elements of the buildings any new construction will neighbour. These elements and associated guidelines are listed below.

- **Façade composition and height** are two major components in maintaining the character of the current streetscapes. A single excessively tall and imposing structure can completely alter the pedestrian-focused atmosphere of the Downtown. Use roof shapes

and major design elements that are complementary to surrounding buildings and heritage patterns.

- **Setbacks** of new development should be consistent with adjacent buildings. New buildings and entrances must be oriented to the street and are encouraged to have architectural interest to contribute to the streetscape. Respond to unique conditions or location, such as corner properties, by providing architectural interest and details on both street facing facades.

2.2 Impact Assessment Criteria

The impact assessment on cultural heritage resources is based on the impacts as defined by *Infosheet #5 Heritage Impact Assessments and Conservation Plans* prepared by the Ontario Ministry of Heritage, Sport, Tourism and Culture Industries. Impacts to heritage resources may be direct or indirect. Direct impacts include:

- **Destruction** of any, or part of any, significant heritage attributes or features.
- **Alteration** that is not sympathetic, or is incompatible, with the historic fabric and appearance.

Indirect impacts do not cause destruction or alteration of the cultural heritage resource, but may include:

- **Shadows** created that alter the appearance of a heritage attribute or change the viability of a natural feature or plantings, such as a garden.
- **Isolation** of a heritage attribute from its surrounding context or a significant relationship.
- **Obstruction** of significant views or vistas within, from, or of built and natural features.
- **A change in land use** such as rezoning a battlefield from open space to residential use, allowing new development or site alteration to fill in the formerly open spaces.
- **Land disturbances** such as a change in grade that alters soils, and drainage patterns that adversely affect an archeological resource.

In addition, the potential for indirect impacts resulting from vibration resulting from construction activities should be considered. For the purpose of this HIA, this impact has been categorized under "land disturbances". Although the impacts of vibration on heritage buildings are not thoroughly studied or well understood, studies have shown that impacts may be perceptible within a 40m radius of development activities including demolition of existing structures, road traffic, and construction of new development (M. Crispino, 2001; Ellis, 2003) and consideration should be given to this potential impact. If left unaddressed, it could result in long-term issues for the maintenance, use, and conservation of the heritage resources.

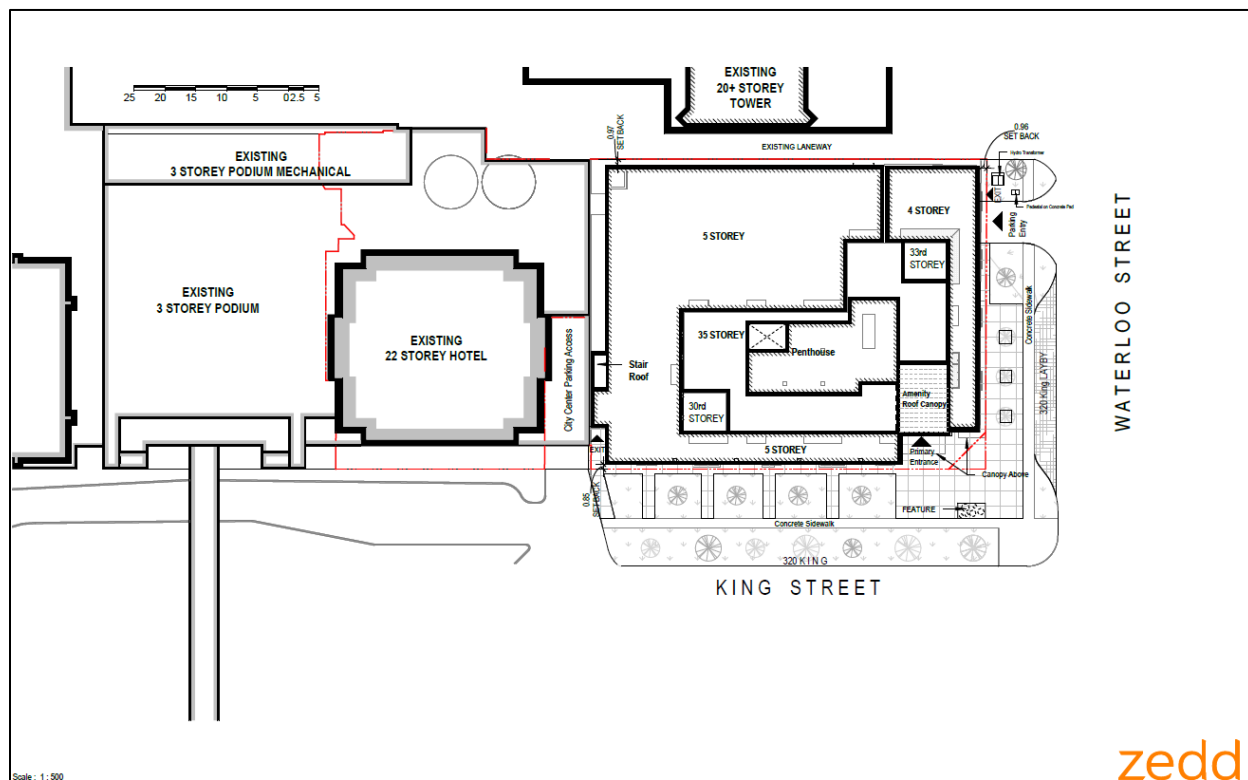
3.0 IMPACT ASSESSMENT

3.1 Proposed Development

The easterly portion of the subject lands (320 King Street) is proposed to be redeveloped for a new 35-storey, 435-unit residential apartment building (Image 8). The existing parking structure is to be demolished. A density of 595UPH (units per hectare) is proposed for the development. The proposed building and the existing building, if converted to apartments, would yield a total site density of approximately 940UPH.

The new 35-storey residential apartment building is comprised of a 4- and 5-storey podium across the entire site, a 25-storey central tower with a floor plate of 1,008m², a 4-storey slimmer tower, and a 1-storey penthouse. The total building height is to be approximately 111m. The podium is comprised of commercial space on the ground floor, a parking structure on the interior, including bicycle storage, with apartment units wrapping around the King Street and Waterloo Street frontages on floors 2-4. A rooftop amenity area is proposed above the four-storey podium, and the upper roof.

Image 8 - Conceptual Site Plan (excerpt)



The proposed building is oriented along, and located close to, the King Street streetscape. The primary building entrance will be located along the King Street frontage with a canopy and signage to clearly define the entrance along the streetscape. Several pedestrian pathways connect the commercial uses on the ground floor to the existing municipal sidewalk on King Street. The site design provides a 0.85m front yard setback from King Street and a 0.96m exterior side yard setback from Waterloo Street to maintain the commercial landscape identified within the Downtown London HCD; established street-walls of adjacent buildings; and, contribute to a positive pedestrian public realm (Image 9).

The building is articulated by distinct building façades. The design recognizes the vertical division and articulation of the range of unit layouts in the building with the use of a mix of high-quality building materials. The tower-over-podium built form provides a pedestrian oriented interface to ensure the building is designed according to a human scale. A variety of materials, colours, and textures break the massing of the building into smaller sections, both vertically and horizontally, to appropriately frame the street and enhance the streetscape (Image 10).

Image 9 – Architectural rendering, overall view

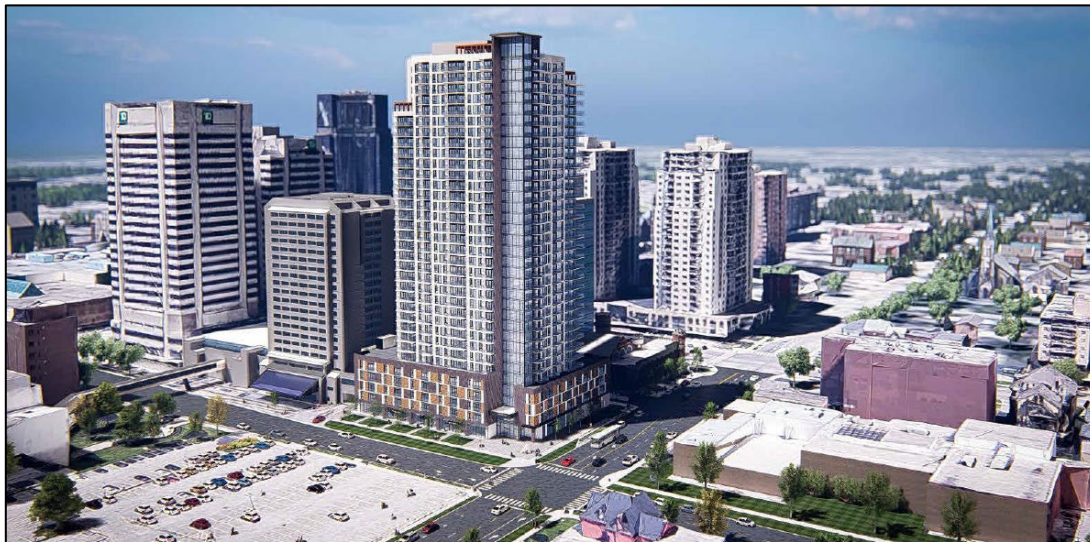


Image 10 – Architectural rendering, perspective along King Street



A 35-storey building, as proposed, is a significant contribution to the City of London skyline. The Downtown London HCD considers multi-storey buildings to be a defining characteristic of the District. When a building exceeds the typical established building height within the District, the HCD Plan provides for a building step back from the street frontage to minimize the spatial impact to the streetscape, and to ensure a human-scale is established. The step back is required at the 18.0m height with a step back distance of 5.0m. The resulting podium at the base of the tower distinguishes itself well from the massing of the upper tower.

The proposed building provides a step back above the podium at both the King Street and Waterloo Street frontages. The podium is approximately 17.3m in height and the provided step back to the tower is approximately 5.2m at both the King Street and Waterloo Street frontages (Images 11-12).

Image 11 – Step back at King Street frontage

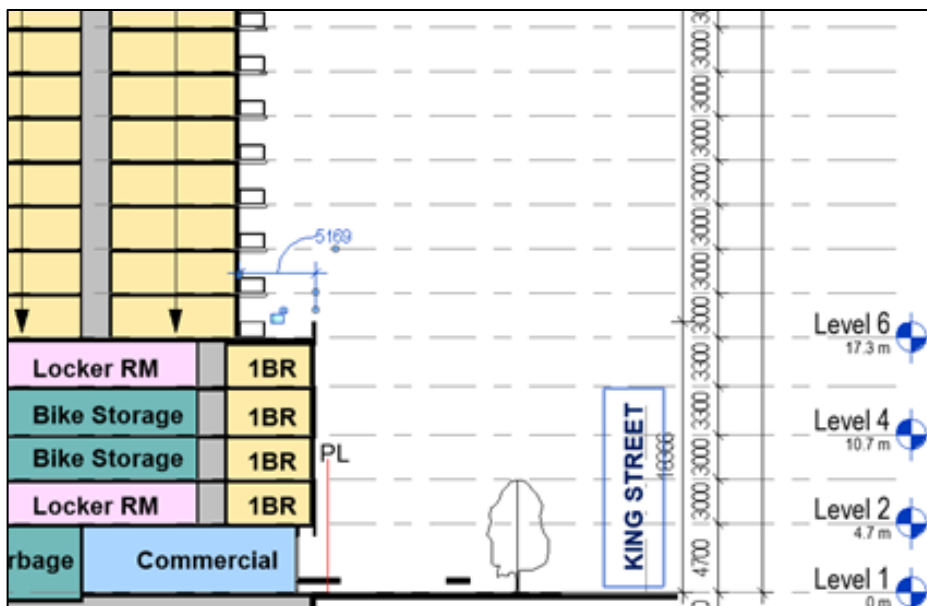
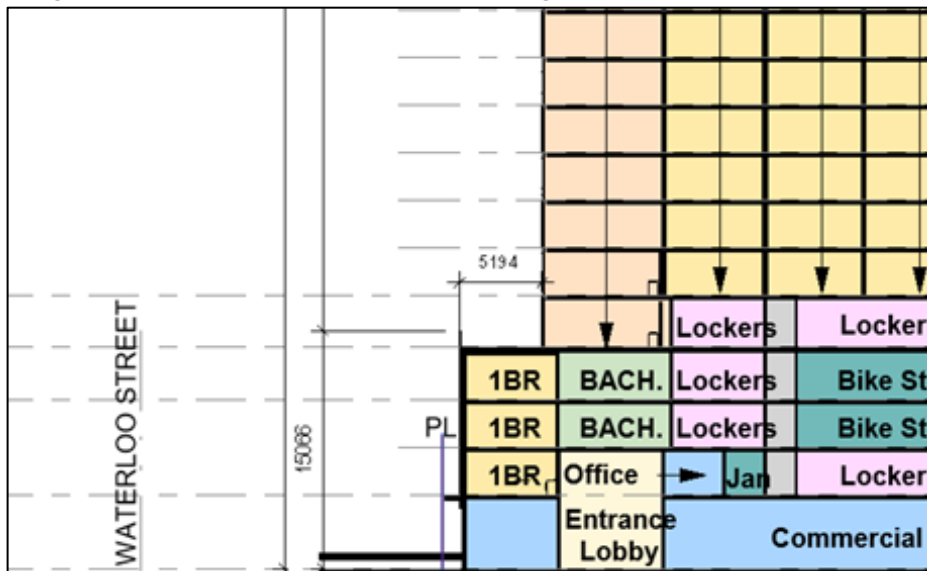


Image 12 – Step back at Waterloo Street frontage



The exterior design of the proposed building is anticipated to provide an attractive and well-executed design with modern architectural details, drawing inspiration from the surrounding architectural elements and materials while remaining noticeably distinct. Notably, the brown and red brick used for the podium pays homage to the materials used for the Delta Armouries, and continues vertically up portions of the building. The overall design of the proposed building is intended to convey a modern look while remaining respectful to the historical character of the surrounding neighbourhood.

Image 13 – Elevation along Waterloo Street



3.2 Assessment of Impacts

The following discussion addresses anticipated and potential impacts of the proposed development on built heritage attributes of 300 King Street, 325 Dundas Street, 275 Dundas Street, and 362 Waterloo Street. Generally speaking, no direct impacts were identified for the buildings as the proposed development will be entirely restricted to the adjacent property at 320 King Street. The identified heritage attributes relate exclusively to building form, materials, and architectural details. Given this, the proposed development will not affect these heritage resources directly. Direct impacts are identified as a result of the proposed development on the built heritage attributes at 320 King Street, being the demolition of the existing parking structure.

Further, the indirect impact on land disruption has the potential to reach beyond the extent of the proposed development and reach the adjacent heritage resources. Vibration effects may be experienced where construction activities are expected. While the impacts of vibration on heritage buildings are not thoroughly studied or well understood, studies have shown that impacts may be perceptible within a 40m radius of development activities including demolition of existing structures, road traffic, and construction of new development. It is unclear at this time how these factors could impact the heritage resources long-term.

No other indirect impacts on the heritage resources from the proposed developed were identified. While the proposed development is likely to cause shadows where they may not currently exist, shadowing on the building form, materials, and architectural details is not anticipated to be permanent as they will fluctuate throughout the day and season and will not cause alteration or destruction.

Isolation and obstruction typically deal with relationships between heritage resources and their associated views. The proposed development is located across the King Street and Waterloo Street intersection from 362 Waterloo Street. From the pedestrian level, the proposed development may obstruct the view of 325 Dundas Street if looking directly north from King Street. However, this is not considered to be a significant view. As such, no attributes will be isolated and no significant views will be obstructed by the proposed development.

The subject lands are proposed to be redeveloped from a two-level parking garage to a 35-storey high-rise building. While there is a significant change in land use proposed, the land use will be similar and complimentary to the existing surrounding uses.

A summary of these findings is included in Table 1 below. Where no impacts to heritage resources are anticipated, 'N' is listed in the 'Impact Potential' column. Where potential impacts to heritage resources are anticipated, 'P' is listed in the column.

Table 1 – Impact Assessment

Possible Impact	Proposed Development	Impact Potential
Destruction	The existing parking structure at 320 King Street is to be demolished. All other Study Area buildings will be maintained as-is.	P
Alteration	Study Area buildings will be maintained as-is.	N
Shadows	Proposed height is complementary to the neighbourhood.	N
Isolation	No isolation of heritage attributes.	N
Obstruction	View from streetscape will not be significantly affected.	N
Land Use Change	Proposed land use is consistent with surrounding land uses.	N
Land Disturbance	Possible vibration from construction activities.	P

According to Section 4.6 of the Downtown London Heritage Conservation District Plan, demolition of buildings within a heritage district is generally discouraged. However, it is recognized that there are situations where demolition may be appropriate and supportable.

In this case, the existing parking structure at 320 King Street is not a contributing property to the Downtown London HCD as it has no notable character defining elements. Thus, demolition of the existing parking structure will not have a significant impact on the character of the District and is appropriate and supportable. Further, the proposed development will contribute to the historical character of the District by providing appropriate façade composition, height, and setbacks to complement adjacent heritage buildings.

4.0 MITIGATION, IMPLEMENTATION, AND MONITORING

4.1 Potential Mitigation Measures

The proposed development has the potential to result in direct and indirect impacts to the identified heritage resources. As such, mitigation measures may be required. Several methods of minimizing or avoiding potential impacts on heritage resources resulting from project activities are described in InfoSheet #5; of the options presented, the establishment of buffer zones, site plan controls, and other planning mechanisms best avoid impacts related to potential vibration effects.

4.2 Mitigation Discussion

As the majority of the study area properties are situated directly adjacent or opposite King Street to the proposed development with demolition and construction activities anticipated within 40m of the study area, indirect impacts from vibration are possible. Where construction activities are anticipated proximate to heritage resources, monitoring activities of vibration levels can gauge whether such activities exceed acceptable vibration levels as determined by a qualified engineer.

An approach to mitigating the potential vibration effects can be done in two stages: first, if required, to develop appropriate construction methodologies in the form of site plan controls, site activity monitoring, or avoidance; second, further action can be taken, if deemed necessary, in the form of monitoring for possible construction and/or demolition impacts such as vibrations during the construction phase.

5.0 RECOMMENDATIONS

The assessment of impacts resulting from the proposed development at 320 King Street has determined that the proposed development could have possible indirect impacts related to vibration effects to the adjacent identified cultural heritage resources at 300 King Street, 325 Dundas Street, 275 Dundas Street, and 362 Waterloo Street. Further, the proposed development is anticipated to have direct impacts related to demolition activities to the identified cultural heritage resources at 320 King Street. Based on the identified impacts, the following mitigation measures are recommended:

- Appropriate construction methodologies to be prepared, if required, and careful adherence to such methodologies to prevent any undue impacts to adjacent identified cultural heritage resources as per the City's Development and Construction Standards; and,
- If required, monitoring for possible construction/demolition impacts such as vibrations would occur during the construction phase of the proposed development.

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