

Heritage Impact Assessment

Citi Plaza London Inc.

267 York Street

City of London



April 17, 2024



EXECUTIVE SUMMARY

Zelinka Priamo Ltd. was retained by Citi Plaza London Inc. to prepare a Heritage Impact Assessment (HIA) as a background document for the proposed redevelopment of the lands known municipally as 267 York Street (hereinafter referred to as the “subject lands”) for a 45-storey, 1,067-unit high-rise residential development. The proposed development is to be located on lands currently used for a parking associated with the Citi Plaza commercial shopping centre located in Downtown London. 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. 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, including monitoring activities of vibration levels to gauge whether such activities exceed acceptable vibration levels as determined by a qualified engineer. It is recommended that this be further explored through the Site Plan Approval process.

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1.0 INTRODUCTION

Zelinka Priamo Ltd. was retained by Citi Plaza London Inc. to prepare a Heritage Impact Assessment (HIA) as a background document for the proposed redevelopment of the lands known municipally as 267 York Street (hereinafter referred to as the “subject lands”) for a 45-storey, 1,067-unit high-rise residential development. The proposed development is to be located on lands currently used for a commercial parking lot. 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 southwest corner of the York Street and Wellington Street intersection (see Image 1). The subject lands consist of a single rectangularly-shaped parcel with an area of approximately 0.47ha with frontages of approximately 81.0m along York Street and approximately 58.5m along Wellington Street. The subject lands abut York Street to the north; Wellington Street to the east; the CN (Canadian National) Rail line to the south; and, commercial parking areas to the west. A 4-storey commercial building is located opposite the subject lands on the north side of York Street; and, a commercial parking area is located opposite the subject lands on the east side of Wellington Street.

The subject lands currently serve as a commercial parking area associated with Citi Plaza, a commercial shopping centre in Downtown London. The subject lands are generally flat in topography, with no vegetation located on the lands (see Image 2).

Existing vehicular access is provided via a single right-in/right-out driveway from York Street. The vehicular portion of the York Street right-of-way consists of two eastbound lanes and two westbound lanes, with turning lanes where necessary, and a centre median. Pedestrian sidewalks are located on both the north and south sides of the York Street right-of-way. Signalized intersections at both Wellington Street/York Street and Clarence Street/York Street control pedestrian and vehicular traffic.

Image 1 – Subject lands



Image 2 – Subject lands, looking southwest from the Wellington St & York St intersection



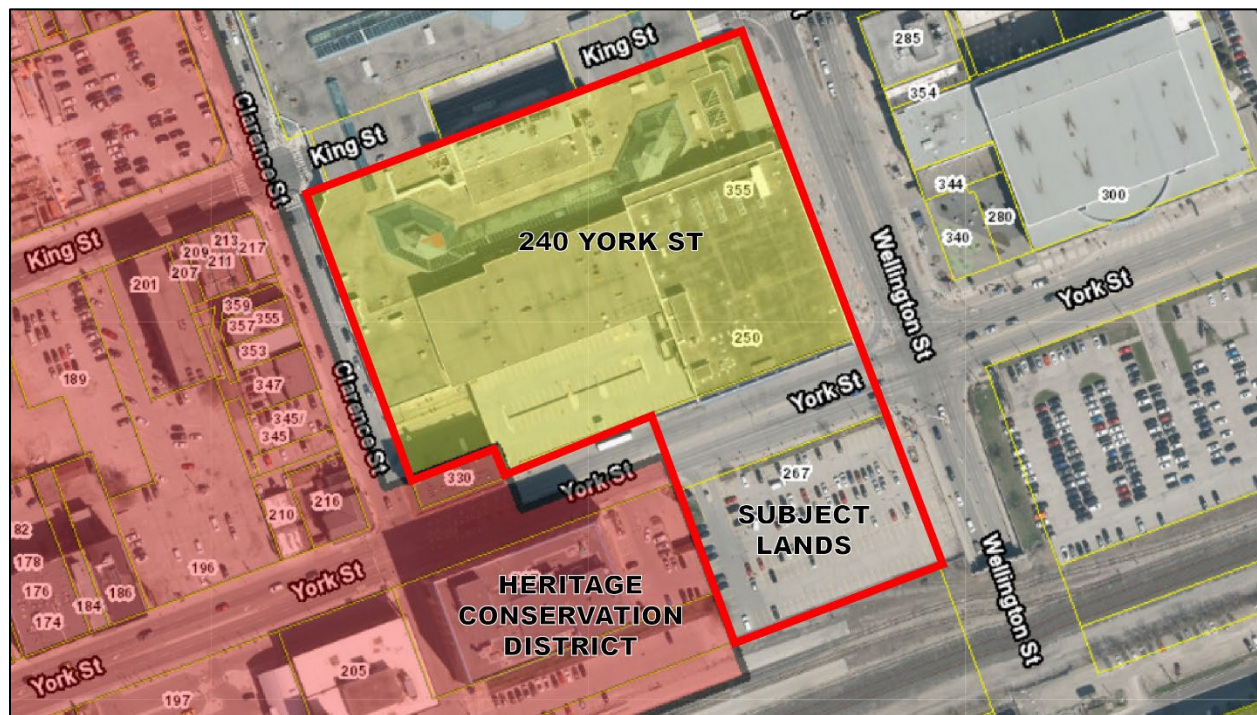
The subject lands are identified as within the “Downtown” Place Type in The London Plan; and, are zoned “Holding, Downtown Area (h-1, h-3, DA2, D350)” in the City of London Z.-1 Zoning By-Law. The subject lands are outside of, but adjacent to, the Downtown London Heritage Conservation District.

267 York Street is not identified as a listed or designated property according to the *City of London Register of Cultural Heritage Resources*.

1.3 Study Area

The study area includes the subject lands and adjacent property to the subject lands, at 240 York Street, that is listed in the *City of London Register of Cultural Heritage Resources* (see Image 3). As the subject lands are adjacent to the Downtown London Heritage Conservation District, the proposed development is evaluated on a high-level basis to analyze its general compatibility to the district.

Image 3 – Study Area



240 York Street (355 Wellington Street as per the Register), known as Wellington Square Mall, is a listed heritage property under Part V of the *Ontario Heritage Act*. Wellington Square Mall is a 4-storey commercial/office building with a glass façade, constructed in 1960 in the Modern architectural style (see Image 4). 240 York Street is located at the northwest corner of the York Street and Wellington Street intersection, opposite the subject lands. This property was added to the *Register* by Municipal Council on March 27, 2018. 240 York Street is located at the northwest corner of the Wellington Street and York Street intersection, directly adjacent the subject lands to the north.

This property has no design or physical value, as it is not a rare or unique representation or early example of a style, type, expression, material or construction method; and, does not display a high degree of craftsmanship, technical merit, or technical or scientific achievement. In addition, the property has no known historical or contextual value. This is further evidenced by the property bordering, but not being included within, the Downtown London Heritage Conservation District.

The original study area boundary of the Downtown London Heritage Conservation District included all lands considered to be within the downtown (Stantec Consulting Ltd., 2011). An in-depth architectural and heritage landscape review led to further recommendations of boundary adjustments, including the removal of most lands encompassing the Wellington/York intersection, including the subject lands. This adjustment came after lengthy debate and discussion between the consulting team, Steering Committee, and City staff at the time the study was being conducted. Upon conclusion, there was agreement that the vacant sites as well as the substantial re-development of Citi Plaza had removed the attributes that had any continuity to the historical and heritage landscape of the downtown. As such, these lands have been pre-evaluated by City staff and deemed to not meet the criteria for designation under O. Reg. 9/06.

Image 4 – 240 York Street / 355 Wellington Street



To the west, the subject lands abut 217 York Street, 205 York Street, and a road allowance which are within the Downtown London Heritage Conservation District.

217 York Street is a designated heritage property under Part V of the *Ontario Heritage Act*. 217 York Street was built in 1960 and formerly known as a Postal Station. 217 York Street is currently occupied by a 5-storey commercial building (Image 5). The property has been completely renovated in recent years, leaving no original features. 217 York Street is directly adjacent to the subject lands to the west. This property was added to the *Register* by Municipal Council on June 27, 2013.

205 York Street is a designated property under Part V of the *Ontario Heritage Act*. 205 York Street was built in 1963 in the Mid-Century Modern architectural style and was formerly used as the CN

Office. 205 York Street is currently occupied by a portion of the VIA Rail Station (Image 6). The property has been renovated, but maintains some original character defining elements, such as original clear glass and coloured panel arrangement, steel frame projecting beyond the façade to create a canopy, and the door entry. Notably, because of the irregular-shape of the property line, only the parking area abuts the subject lands. The building on the subject lands is located west of the building at 217 York Street, described above. This property was added to the *Register* by Municipal Council on June 27, 2013.

The road allowance abutting the subject lands to the west is unoccupied. As noted above, this property, 217 York Street, and 205 York Street are located within the Downtown London Heritage Conservation District and abut the subject lands to the west.

Image 5 – 217 York Street



Image 6 – 205 York Street



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 property at 240 York Street is a listed heritage property on the *City of London Register of Cultural Heritage Resources*. 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 study area are outside of, but adjacent to, the Downtown London Heritage Conservation District. Although the guidelines of the Plan are not applicable to the proposed development, they have been analyzed to ensure a general level of compatibility between the proposed development and the District. 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.

While the proposed development is adjacent to the Downtown London HCD and not subject to the Plan's guidelines, the guidelines were considered in the design of the proposed development.

The proposed development provides a modern glass façade which is reflective of the façade styles of the adjacent built heritage resources. The proposed building will be significantly taller than the surrounding existing buildings, but is consistent with the planned function of the subject lands as per The London Plan (the City of London Official Plan).

The proposed development maintains the established street wall by providing a built-form that addresses both the York Street and Wellington Street frontages with minimal setbacks. The main building entrance is oriented to the street and provides architectural interest in the form of a canopy over the main entrance, similar to the built heritage resource at 205 York Street.

The proposed development respects its proximity to the Downtown London HCD by providing a substantial setback (12.5m) between the 40-storey tower and the shared property line with the adjacent built heritage resources.

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.

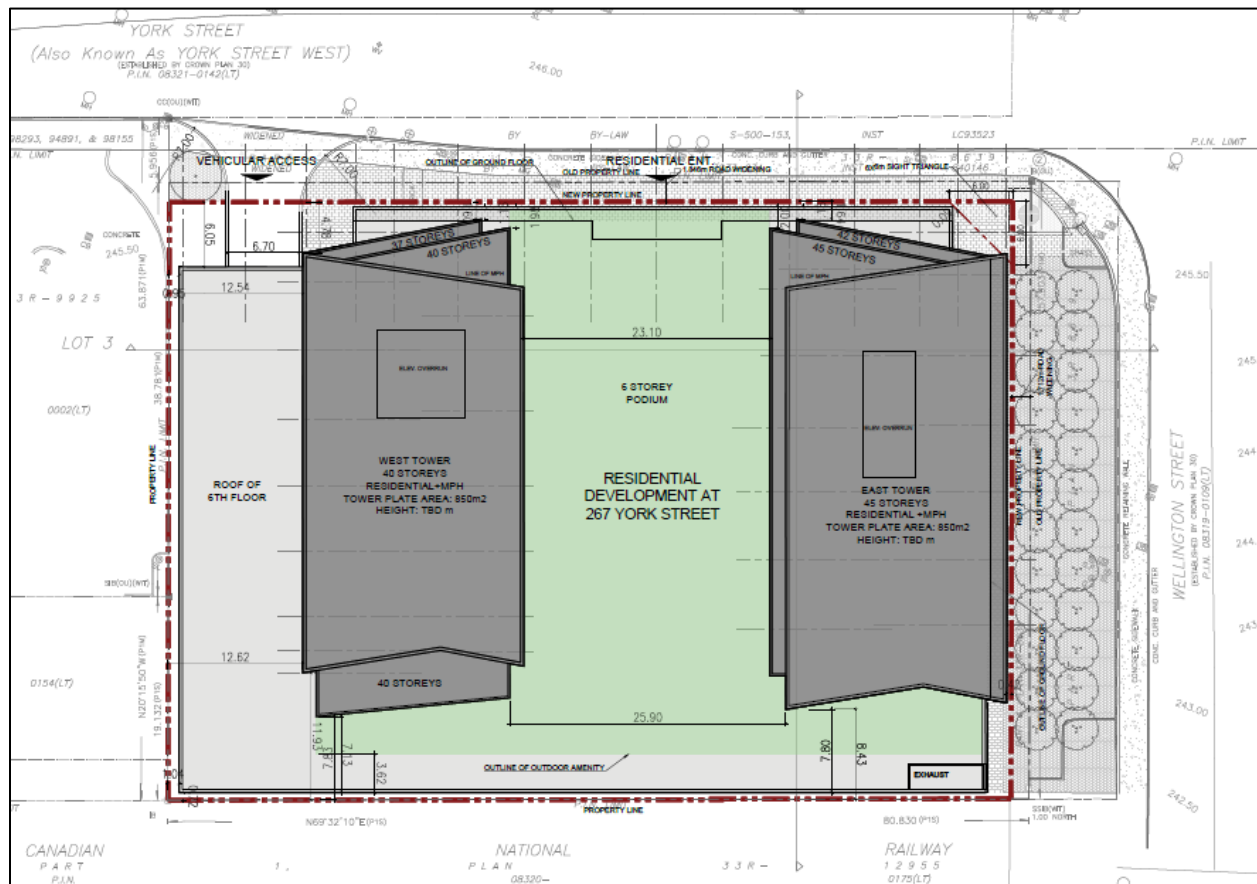
In addition, the potential for indirect impacts resulting from vibration resulting from construction activities should be considered. For the purpose of this HIA, this impact has been categorized under “land disturbances”. Although the impacts of vibration on heritage buildings are not thoroughly studied 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 subject lands are proposed to be redeveloped for a 40-storey west tower and a 45-storey east tower interconnected by a 6-storey podium (see Image 5). The proposed development consists of 1,067 residential dwelling units, equating to a residential density of approximately 2,270uph (units per hectare).

Image 5 – Conceptual Site Plan (excerpt)



The 6-storey podium will consist of six levels of parking, along with building amenities and 80 residential dwellings units. Two levels of underground parking are provided, for a total of 609 total parking spaces with a parking ratio of 0.65 spaces per unit. Bicycle parking is provided, with 961 long-term bicycle parking spaces, as well as 107 short-term bicycle parking spaces, for a total bicycle parking ratio of 1 space per unit.

Both indoor and outdoor amenity areas are provided. To accommodate outdoor amenity space, a rooftop terrace is provided on top of the 6-storey podium.

The proposed building is oriented along, and located close to, the York Street and Wellington Street streetscapes. The primary building entrance will be located along the York Street frontage

with a canopy and signage to clearly define the entrance along the streetscape. Pedestrian pathways connect the building entrances to the existing pedestrian realm along York Street.

The site design provides a 1.16m front yard setback from York Street and a 0m exterior side yard setback from Wellington 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.

A 45-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. While the building does not provide the recommended 5.0m setback from the York Street and Wellington Street frontages, a 12.54m setback is provided between the property line interfacing with the District and the westerly tower.

The exterior design of the proposed building is anticipated to provide an attractive and well-executed design with modern architectural details. While the building utilizes modern materials, it is not anticipated to detract from the unique architectural style of the District (see Image 6).

Image 6 – Conceptual renderings



3.2 Assessment of Impacts

The following discussion addresses anticipated and potential impacts of the proposed development on the built heritage attributes of 240 York Street, 217 York Street, and 205 York Street. Generally speaking, no direct impacts were identified for the buildings as the proposed development will be entirely restricted to the adjacent property at 267 York 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.

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 will 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 York Street right-of-way from 240 York Street., and adjacent to 217 York Street. The proposed development is unlikely to obstruct the view of 240 York Street from the pedestrian level, considering the CN Rail track directly abuts the subject lands to the south. The proposed development may obstruct the view of 217 York Street if looking directly west from York 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 commercial parking lot to a 45-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	Study Area buildings will be maintained as-is.	N – The proposed development does not include the destruction or demolition of the adjacent built heritage resources.
Alteration	Study Area buildings will be maintained as-is.	N – The proposed development does not include the alteration of the adjacent built heritage resources.
Shadows	Proposed height is complementary to the neighbourhood.	N – While the proposed development may produce shadows where none currently exist, these will be temporary depending on the season and time of day and will not result in any permanent impact. There are no natural features, such as community gardens, that would be affected by additional shadowing.
Isolation	No isolation of heritage attributes.	N – Considering the proposed development is on the periphery of the Downtown London HCD, the properties within the District will remain as-is and will not be isolated from their context. The property at 240 York Street is separated from the proposed development by a public right-of-way, and as such will remain as-is.
Obstruction	View from streetscape will not be significantly affected.	N – The views of the built heritage resources may be affected by the proposed development. However, these are not considered to be significant views.
Land Use Change	Proposed land use is consistent with surrounding land uses.	N – The proposed development is consistent with the planned function of the subject lands according to The London Plan. The proposed land use, being high-density residential, is consistent and complimentary to the surrounding uses in the Downtown.
Land Disturbance	Possible vibration from construction activities.	P – The construction activities to construct the proposed development may result in vibrations which could affect the adjacent built heritage resources.

4.0 MITIGATION, IMPLEMENTATION, AND MONITORING

4.1 Potential Mitigation Measures

The proposed development has the potential to result in 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 study area property, and properties located within the HCD, are situated directly adjacent or opposite York 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 267 York Street has determined that the proposed development could have possible indirect impacts related to vibration effects to the adjacent identified cultural heritage resources at 240 York Street, and adjacent properties within the HCD. 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, including monitoring activities of vibration levels to gauge whether such activities exceed acceptable vibration levels as determined by a qualified engineer. It is recommended that this be further explored through the Site Plan Approval process.

6.0 REFERENCES

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