

Report to London Advisory Committee on Heritage

To: Chair and Members
London Advisory Committee on Heritage
From: John M. Fleming
Managing Director, Planning and City Planner
Subject: Demolition Request for Heritage Designated Property at 123
Queens Avenue by JAM Properties Inc.
Meeting on: Wednesday May 8, 2019

Recommendation

That, on the recommendation of the Managing Director, Planning & City Planner, with the advice of the Heritage Planner, with respect to the request for the demolition of a heritage designated property located at 123 Queens Avenue, within the Downtown Heritage Conservation District, the following report **BE RECEIVED** and the following actions **BE TAKEN**:

- A. That the demolition request **BE REFUSED**; and,
- B. That the Chief Building Official **BE ADVISED** of Municipal Council's intention in this matter.

Executive Summary

A demolition request was received for the heritage designated property located at 123 Queens Avenue. The subject property is located within the Downtown Heritage Conservation District. The request for demolition is due to health and safety concerns arising from the unsecured nature of the building, not structural concerns, and the property is proposed to be used for an interim surface parking lot. A Heritage Impact Assessment accompanied the demolition request for the property, which found that both direct and indirect impacts are anticipated as a result of the proposed site alteration.

Although retention of the building at 123 Queens Avenue has not been recommended in the Heritage Impact Assessment, the anticipated impacts as a result of the demolition of the property would need to be mitigated. The property has been designated as part of the Downtown Heritage Conservation District and the property contributes to the existing streetscape and character of the District. Impacts to the streetscape and to the property at 123 Queens Avenue cannot be mitigated with the development of a surface parking lot. The *Downtown Heritage Conservation District Plan* recognizes that there are situations where demolition may be permitted to allow for redevelopment that is in keeping with appropriate City policies and where the impact associated with the alterations to the property are able to be mitigated. Such redevelopment has not been proposed in this instance.

The purpose and effect of the recommended action is to refuse the demolition request for the heritage designated property at 123 Queens Avenue.

Analysis

1.0 Background

1.1 Property Location

The property at 123 Queens Avenue is located on the south side of Queens Avenue, east of Talbot Street (Appendix A). The structure at 123 Queens Avenue bookends the west side of the commercial parking lots that stretches between Talbot Street and Richmond Street.

1.2 Heritage Status

The property at 123 Queens Avenue is designated under Part V of the *Ontario Heritage Act*, as it is located within the Downtown Heritage Conservation District, which was

designated in 2013 by By-law No. L.S.P. - 34191-24. The property is ranked C in the *Downtown Heritage Conservation District Plan*. Properties that have a C ranking contribute to the Downtown Heritage Conservation District and must still comply with the Design Guidelines within Section 6.0 of the *Downtown Heritage Conservation District Plan*.

1.3 Description

The building located at 123 Queens Avenue was built between 1916 and 1922. The building at 123 Queens Avenue is a three storey, red brick, industrial structure that is connected to 450 Talbot (Appendix B). The building located at 450 Talbot Street was one of the London's first buildings constructed using reinforced concrete, a construction method continued that continued at 123 Queens Avenue (Stantec 3.7). The building is constructed of reinforced concrete, reinforced concrete masonry units, and plain concrete masonry units.

The front façade is clad in red and buff brick with concrete posts and beams and is topped with a concrete parapet. The horizontal beams use to align with the beams at 450 Talbot Street (Appendix B, see Image 4). However, 450 Talbot Street has since been re-cladded. Ornamental concrete diamonds appear on the second and third storey between the concrete posts and beams. The remnants of Cities Heating Company sign and logo can still be seen on the horizontal beam between the first storey and second storey. The first storey has an off-centre entrance with a concrete lintel. A wooden door and transom window with municipal address number is inset from the front façade. Next to the doorway is a window opening with a concrete sill and lintel. Two windows with a concrete lintel have been filled in with red brick next to the laneway. A laneway divides 123 Queens Avenue and 450 Talbot Street at street level, but is connected at the second and third storeys.

The east and south façade is clad in parged concrete and contains window openings on the second and third floor with no windows remaining. The west façade is also clad in parged concrete. The third storey contains five window openings with concrete windowsills and what appear to be the original windows. The windows are 15-pane glass windows with six panes in the middle that pivot open. The second storey contains five window openings with concrete sills. The connection between 450 Talbot Street and 123 Queens Avenue contains one 20 and one 25 pane glass windows with concrete sills. Just above the laneway is a large window opening with a concrete sill. The first storey contains three entrances and three window openings with metal bars and concrete sills.

The attributes of the property located at 123 Queens Avenue, such as scale, location, materials, and features support the character of the Downtown Heritage Conservation District. The physical connection with the adjacent property located at 450 Talbot Street also contributes to the pattern of development within the Downtown Heritage Conservation District and contributes to the Queens Avenue streetscape.

1.4 Property History

The building located on the property at 123 Queens Avenue originally housed two boilers for Green-Swift as well as a chimney, coal hopper, and boiler feed pumps. The building was built as an addition for the clothing manufacturer, the Greene-Swift Company, at 450 Talbot Street. Although, the Greene-Swift company was mainly a clothing manufacturer, they also sold the exhaust from the boiler to nearby buildings as steam heat (Stantec 3.7). The addition of two new boilers meant that Greene-Swift could expand their ability to sell steam heat.

By 1928 the steam heating component of the Greene-Swift Company formed a separate company known as the Cities Heating Company and was assigned the municipal address of 123 Queens Avenue (Stantec 3.7). Between 1925 and 1939, the Cities Heating Company expanded and an addition to 123 Queens Avenue was built. By 1958, the Cities Heating Company was supplying heat to the majority of downtown businesses, including the Kingmills Department Store, Covent Garden Market, and the Simpsons Department Store (Stantec 3.7).

From the 1950s until about 1989, Cities Heating Company was owned by Thomas Hayman, a noted member of the community and avid outdoorsman (Stantec 3.8). He was also a columnist for the London Free Press, writing the “World Outdoors” column for 48 years (Stantec 3.8). According to the research uncovered in the Heritage Impact Assessment, Hayman’s dedication to conservation and birding earned him an award from the Ontario Field Ornithologists in 2003 and the Conservation Award from Nature London in 2006 (Stantec 3.8). Hayman passed away in 2014.

In 1989, Hayman sold Cities Heating Company to Trigen, who until 1993, continued to use the Cities Heating Company name. The directories listed 123 Queens Avenue as “Trigen London District Energy and Cities Heating Company” (Stantec 3.8). In 1994, the Cities Heating Company name was retired, becoming known as London District Energy, and the plant and offices at 123 and 125 Queens Avenue were closed (Stantec 3.8). Trigen left 123 and 125 Queens Avenue in 1995 (Stantec 3.8).

In 2003, the building located at 125 Queens Avenue, which was built as an addition for Cities Heating Company, was demolished. In 2010, the original east façade of 123 Queens Avenue was parged over in response to a Property Standards Order. The property at 123 Queens Avenue continues to be vacant.

1.5 Downtown Development – 20th century

The building located at 123 Queens Avenue is directly associated with London’s downtown development during the 20th century. During the early 20th century the City of London was in the midst of an industrial boom. Many modern improvements arrived in the City of London, such as electrical power from Niagara Falls, paving main roads in asphalt, and the distribution of water by the Public Utilities Commission. During the 1930s, several major building projects were completed in London, including the underpass of Richmond Street under the CNR tracks and construction of the Dominion Public Building, located approximately 50 metres east of 123 Queens Avenue.

The building located at 123 Queens Avenue participated in London’s industrial development of the 20th century. The building at 123 Queens Avenue began selling steam heat to nearby buildings between 1916 and 1922 and by 1928 the company known as Cities Heating Company was formed (Stantec 3.7). By 1958, Cities Heating Company was supplying heat to the majority of downtown businesses. The research completed by Stantec for the Heritage Impact Assessment found that that Cities Heating Company provided heat to buildings south to York Street, west to Ridout Street, and east to Waterloo Street (3.7). The approximate northern extent of Cities Heating Company’s service was not determined (Stantec 3.7).

2.0 Legislative and Policy Framework

2.1 Provincial Policy Statement

Heritage conservation is a matter of provincial interest (Section 2.d, Planning Act). The Provincial Policy Statement (2014) 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.”

“Significant” means “resources that have been determined to have cultural heritage value or interest for the important contributions they make to our understanding of the history or a place, an event or a people” (PPS 2014). “Built heritage resource” means “a building, structure, monument, installation or any manufactured remnant that contributes to a property’s cultural heritage value or interest as identified by a community, including an Aboriginal community. Built heritage resources are generally located on property that has been designated under Parts IV or V of the Ontario Heritage Act, or included on local, provincial and/or federal registers’ (PPS 2014).

“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 under the Ontario Heritage

Act. This may be achieved by the implementation of recommendations set out in a conservation plan, archaeological assessment, and/or heritage impact assessment. Mitigative measures and/or alternative development approaches can be included in these plans and assessments” (PPS 2014).

2.2 Ontario Heritage Act

Revisions to the Ontario Heritage Act strengthened its protection of Ontario’s cultural heritage resources. While the pre-2005 Ontario Heritage Act could only delay the demolition of a building located on a heritage designated property for 180 days, revisions to the Ontario Heritage Act in 2005 enabled municipalities to refuse demolition requests of buildings located on heritage designated properties.

In requests for demolition of a building located on a heritage designated property, *the Ontario Heritage Act* enables municipalities 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 respond within 90 days after receipt of a demolition request. Consultation with the municipality’s municipal heritage committee (the London Advisory Committee on Heritage) is required. Non-decision within 90-days, the refusal, or terms and conditions on the approval of a demolition request may be appealed to the Local Planning Appeal Tribunal (LPAT).

2.3 Official Plan/The London Plan

Chapter 13 (Heritage of the City of London’s Official Plan (1989, as amended) recognizes that properties of cultural heritage value or interest

Provide physical and cultural links to the original settlement of the area and to specific periods or events in the development of the City. These properties, both individually and collectively, contribute in a very significant way to the identity of the City. They also assist in instilling civic pride, benefitting the local economy by attracting visitors to the City, and favourably influencing the decisions of those contemplating new investment or residence in the City.

The objectives of Chapter 13 (Heritage) support the conservation of heritage resources, including encouraging new development, redevelopment, and public works to be sensitive to, and in harmony with, the City’s heritage resources (Policy 13.1.iii). This direction is also supported by the policies of The London Plan (adopted 2016); The London Plan has greater consideration for potential cultural heritage resources that are listed, but not designated under the *Ontario Heritage Act*, through planning processes.

Applicable policies include:

- Policy 563_: In conformity with the Urban Regeneration policies in the Our City part of this Plan, initiatives will be taken to support the adaptive re-use of cultural heritage resources to facilitate economic revitalization of neighbourhoods and business areas.
- Policy 566_: Relocation of cultural heritage resources is discouraged. All options for on-site retention must be exhausted before relocation may be considered.
- Policy 567_: In the event that demolition, salvage, dismantling, relocation or irrevocable damage to a cultural heritage resource is found necessary, as determined by City Council, archival documentation may be required to be undertaken by the proponent and made available for archival purposes.
- Policy 568_: Conservation of whole buildings on properties identified on the Register is encouraged and the retention of façades alone is discouraged.

The portion of a cultural heritage resource to be conserved should reflect its significant attributes including its mass and volume.

The 1989 Official Plan and The London Plan also has policies related to Permitted Uses in the Downtown. Policy 4.1.6 in the 1989 Official Plan, addresses commercial parking structures and surface parking lots:

viii) Commercial parking structures are a permitted use in the Downtown and are encouraged to locate in peripheral areas of the Downtown. The design of these structures along the street edge should be addressed through consideration of the Downtown Design Guidelines specifically requiring enhanced landscaping and consideration of pedestrian connections.

The long term intent of the Plan is to improve the aesthetics of existing surface parking lots and to discourage new surface parking lots in the Downtown, especially where they involve the removal of buildings.

Policy 800_ in The London Plan also directs that new surface commercial parking lots shall not be permitted. Although, this policy is currently under appeal at the time of writing, it is important to note the permitted uses in the Downtown.

2.4 Downtown Heritage Conservation District

The *Downtown Heritage Conservation District Plan* came into force an effect in 2013 by By-law No. L.S.P. - 34191-24. The *Downtown London Heritage Conservation District Plan* provides polices and guidelines to protect, manage, and enhance the unique heritage attributes and character of London's Downtown.

The *Downtown London Heritage Conservation District Plan* contains specific policies with regard to demolition. Section 4.6 of the *Downtown London Heritage Conservation District Plan* contains the following policies on demolition within the district:

The goal of a heritage conservation district is to preserve and protect the heritage assets within the short term and over the long term. Demolition of buildings within a heritage district is strongly discouraged.

However, the *Heritage Conservation District Plan* recognizes that there are situations where demolition may be necessary 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.

Principles outlined in Section 3.1 of the *Downtown Heritage Conservation District Plan*, establish fundamentals derived from The Venice Charter (1964). One of these heritage principles, is particularly pertinent to demolition requests:

Find a Viable Social or Economic Use - Buildings that are vacant or underutilized come to be perceived as undeserving of care and maintenance regardless of architectural or historic merit. City Council and staff should actively encourage and support appropriate forms of adaptive reuse when necessary to preserve heritage properties.

Encouraging redevelopment, intensification, and acceptance of the Downtown as the cultural and social focus of the community is a social goal and objective of the Downtown Heritage Conservation District Plan. There are also goals for the *Downtown Heritage Conservation District Plan*, which include the retention, conservation, and adaption of existing building stock as well as encouraging the repair and maintenance of heritage buildings.

2.5 Property Standards

The City of London has implemented By-law CP-16 (Property Standards By-law) that outlines the standards for Heritage Properties. Section 2.7 of the Property Standards By-law defines "maintained", in respect of heritage attributes, as maintained, preserved, protected, repaired, reconstructed, refinished, or replaced, in compliance with the *Ontario Heritage Act*.

Section 2.7.2 directs that:

In addition to the minimum standards for the maintenance of property set out in this by-law, all of the heritage attributes of a Part IV heritage property and a Part V heritage property shall be maintained.

Section 2.8 of the Property Standards By-law applies only to vacant buildings on a Part IV heritage property or a Part V heritage property. Section 2.8 directs that:

(2) Despite section 4.3, in order to minimize the potential of deterioration of a building, where the exterior doors, windows or other openings are missing, broken, improperly fitted, unsecure or in disrepair, or where the property remains vacant for a period of 30 days or more, the property shall be boarded in compliance with the following requirements:

(a) all boards used in the boarding shall be installed from the exterior and shall be properly fitted in a watertight manner to fit within the side jambs, head jamb and the exterior bottom sill of the door or window so that any exterior trim remains uncovered and undamaged by the boarding;

(b) all boards should be at least 12.7mm (0.5 in.) weatherproofed sheet plywood secured with nails or screws at least 50 millimetres (2 inches) in length and be installed at appropriate intervals on centre;

(c) all boards shall be painted or otherwise treated so that the colour blends with the exterior of the building or structure.

(4) In addition to section 4.6, the exterior of the building shall be maintained to prevent moisture penetration and damage from the elements.

3.0 Demolition Request

The property owner's written notice of their intention to demolish the building located on the heritage designated property at 123 Queens Avenue was received on March 27, 2019. This demolition request was accompanied by a Heritage Impact Assessment (prepared by Stantec dated March 26, 2019) (Appendix C).

Municipal Council must respond to a request for the demolition of a heritage designated property within 90 days, or the request is deemed consented. During this 90 day period, the London Advisory Committee on Heritage (LACH) is consulted and, pursuant to Council Policy, a public participation meeting is held at the Planning and Environment Committee.

The 90-day period for the demolition request for the building located on 123 Queens Avenue expires on June 25, 2019.

Consultation

Pursuant to Council Policy for the demolition of heritage designated properties, notification of the demolition request was sent to 47 property owners within 120m of the subject property on April 23, 2019, as well as community stakeholders including the Architectural Conservancy Ontario – London Region, London & Middlesex Historical Society, and the Urban League. Notice was also published in The Londoner on April 25, 2019. At the time of writing, no replies have been received seeking further information regarding this demolition request.

4.0 Analysis

A Heritage Impact Assessment accompanied the demolition request for the building located at 123 Queens Avenue. JAM Properties Inc. retained Stantec Consulting Ltd. (Stantec) to prepare a Heritage Impact Assessment for 123 Queens Avenue. The

property owner recently purchased the property and is requesting demolition due to health and safety concerns and plans to turn the property into an interim parking lot.

The Ministry of Tourism, Culture, and Sport's Info Sheet #5 provides the purpose of a Heritage Impact Assessment and what should be included in the assessment. A Heritage Impact Assessment, according to the Ministry of Tourism, Culture, and Sport is:

a study to determine if any cultural heritage resources (including those previously identified and those found as part of the site assessment) are impacted by a specific proposed development or site alteration. It can also demonstrate how the cultural heritage resource will be conserved in the context of redevelopment or site alteration. Mitigative or avoidance measures or alternative development or site alteration approaches may be recommended. (MTCS, Infosheet #5)

The impacts to a cultural heritage resources are assessed on a case by case basis.

4.1 Impacts to Heritage Designated Properties

The Heritage Impact Assessment reviewed the *Downtown Heritage Conservation District Plan* and character statements of the Downtown Heritage Conservation District. The Heritage Impact Assessment found that:

"Both direct and indirect impacts are anticipated as a result of the proposed development. Direct impacts include the demolition of the structure at 123 Queens Avenue. This is an irreversible impact and contrary to the policies of the Downtown London HCD, which discourages demolition of heritage buildings." (Stantec 6.3)

Direct impacts are also anticipated to the building located at 450 Talbot Street as the building is both physically and historically connected to the building at 123 Queens Avenue. The building at 450 Talbot Street is physically connected at the second and third story to the building at 123 Queens Avenue and demolishing the building at 123 Queens Avenue would result in alterations to the east façade of 450 Talbot Street. The building located at 123 Queens Avenue was built as an addition to 450 Talbot Street. The Greene-Swift Company began selling exhaust from the boiler to nearby buildings as steam heat and the addition, located at 123 Queens Avenue, meant that the Greene-Swift Company could expand their ability to sell steam heat. Despite the success of the Cities Heating Company, the Greene-Swift Company did not survive the Great Depression and closed during the 1930s.

Indirect impacts, such as vibration, are also identified as having impacts on adjacent buildings within 50 metres of the property at 123 Queens Avenue (Stantec 6.3).

4.2 Impacts to the Downtown Heritage Conservation District

The Heritage Impact Assessment assessed how the proposed interim parking lot impacts the significant features or character of the Downtown Heritage Conservation District. Other anticipated direct impacts are to the heritage attributes and character of the Downtown Heritage Conservation District. The anticipated impacts include:

- The removal and alteration to original building composition of independent structures of typically two or three storeys
- The removal of existing building materials,
- Alteration of the existing streetscape along Queens Avenue, and
- The removal of the laneway connecting Talbot Street and Queens Avenue, which the Heritage Impact Assessment notes as being a "relatively unique characteristic in this portion of the Downtown HCD." (Stantec 6.5)

These anticipated impacts are the result of a change in the existing patterns of the building, lot, and landscape fabric as the building at 123 Queens Avenue, which contributes to these elements, would be removed and replaced with an empty lot (Stantec 6.3).

In the cases where no impacts are anticipated, it was noted that the scope of the proposed undertaking is not applicable to an attribute of the Downtown Heritage Conservation District.

4.3 Heritage Impact Assessment Recommendations

The Heritage Impact Assessment finds that retention in situ is not the preferred option because the health and safety concerns outweigh the retention of the building at 123 Queens Avenue. The health and safety concerns stem from the challenges securing the building. According to the Heritage Impact Assessment “the building has been repeatedly broken into and represents a substantial safety hazard to any unauthorized occupants” (Stantec 7.2). The health and safety concerns outweigh the retention of the building at 123 Queens Avenue because “the building does not contribute significantly to the streetscape” and does not communicate its history due to “the significant modifications in the front façade, including windows that have been closed in with bricks.” (Stantec 7.2).

The building at 123 Queens Avenue successfully communicates its history within the City of London’s downtown as the front façade retains many of its heritage attributes. The retention of the heritage features can easily be seen when comparing the photo from 1955 to the present front façade (Appendix B, Image 4). The front façade retains the red and buff brick cladding with concrete posts and beams, concrete parapet, ornamental concrete diamonds, off-centre recessed entrance with a concrete lintel, and transom window with municipal address number. The window opening next to the door has been retained as well as the concrete sill and lintel. Also, the laneway continues to exist between the buildings at 123 Queens Avenue and 450 Talbot Street at street level. Even remnants of the Cities Heating Company sign can still be seen on the front façade. The windows that used to exist on the main floor was adapted while the building was still being used by the Cities Heating Company. As this change occurred before the Cities Heating Company moved buildings in 1995, this alteration contributes to the evolution of the property.

4.3.1 Mitigative Measures

As retention in situ is not the preferred option by the Heritage Impact Assessment, the anticipated impacts need to be mitigated. However, the Heritage Impact Assessment does not provide recommendations to mitigate impacts to the streetscape. The Heritage Impact Assessment states:

Impacts associated with the Downtown HCD relate largely to modification of the current streetscape. The current building at 123 Queens Avenue is consistent with the character of the district in scale, three storeys in height, and position, built out to the boundary of the building lot. While Queens Avenue between Richmond and Talbot Streets deviates from the general character of the Downtown HCD in its street level parking and lack of building frontages, it is considered part of the district and changes to it should be in keeping with district guidelines. Therefore, in the absence of a structure to replace the current building, mitigating this impact is challenging. The use of the property as a parking lot does not allow for the impact to be lessened with replacement of the building with a similar scaled or positioned structure. Nor does a parking lot allow for similar materials to be used or the laneway to be incorporated. (Stantec 7.2.4)

In the absence of such a proposal, the impacts to the heritage designated buildings and the Downtown Heritage Conservation District cannot be mitigated. If there was a redevelopment proposal, mitigative measures could be proposed that would address to the impacts to both the heritage designated properties and the streetscape.

4.4 Future Redevelopment

The property located at 123 Queens Avenue is a significant cultural heritage resource, with direct associations to the City of London’s downtown development during the 20th century. Demolishing the building at 123 Queens Avenue is contrary to the *Downtown Heritage Conservation District Plan* and impacts the streetscape, which cannot be mitigated through the implementation of an interim parking lot. However, the *Downtown Heritage Conservation District Plan* recognizes that there are situations where

demolition may be permitted for redevelopment that is in keeping with appropriate City policies.

If redevelopment of the property located at 123 Queens Avenue was proposed, the Heritage Alteration Permit process would ensure that the redevelopment maintains the character of the Downtown Heritage Conservation District and complies with the *Downtown Heritage Conservation District Plan*.

4.0 Conclusion

Our cultural heritage resources are records that tells a story about how our city has been modified by human activity and how it continues to evolve. It gives us a sense of our city’s past so that we can better understand our future. Our cultural heritage resources are non-renewable. Once demolished, they are gone forever.

The current demolition request is contrary to the heritage policy framework for the subject property including the Provincial Policy Statement, The London Plan, and the Downtown Heritage Conservation District Plan. There is no policy basis to support the demolition request for this heritage designated property.

The property located at 123 Queens Avenue is a significant cultural heritage resource with direct associations to the City of London’s downtown development during the 20th century. The demolition request should be refused.

Prepared by:	Krista Gowan, Heritage Planner
Submitted by:	Gregg Barrett, AICP Manager, Long Range Planning and Sustainability
Recommended by:	John M. Fleming, MCIP, RPP Managing Director, Planning and City Planner
Note: The opinions contained herein are offered by a person or persons qualified to provide expert opinion. Further detail with respect to qualifications can be obtained from Planning Services	

May 3, 2019
KG/kag

Appendix A - Location



Figure 1: Location of the property at 123 Queens Avenue.

Appendix B – Images



Image 1 – Photo of the front façade of the building located at 123 Queens Avenue (April 25, 2019)



Image 2 – Photo of the front façade of the building located at 123 Queens Avenue (April 25, 2019)



Image 3- Photo of the east façade of the building located at 123 Queens Avenue (April 25, 2019)



Image 4 – Photo of the front façade at 123 Queens Avenue looking west from Richmond (London Free Press, 1954).



Image 5 – Photo of the south side of Queens Avenue looking east from Talbot Street. Photo taken prior to 1988. The photo shows the bricked in windows at 123 Queens Avenue, but also shows 3 pipes running into the building through the former openings. The exact date of the photo has not been confirmed, but an aerial from 1988 shows the lot located at 134 Carling Street as vacant, which dates the photo to prior 1988 as the photo shows a building on the property at 134 Carling Street. This means that the windows were bricked in at some point between 1955 and 1988.

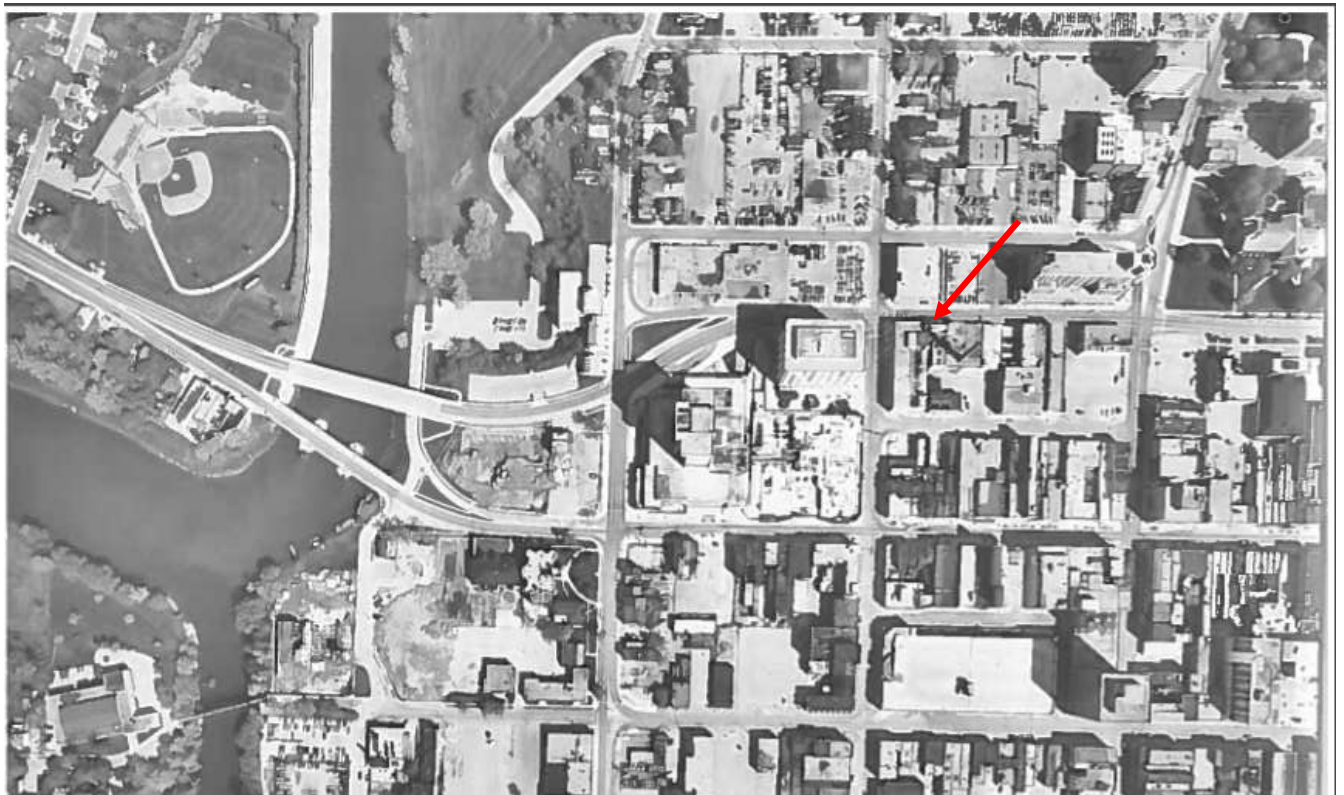


Image 6 – 1986 Aerial showing Queens Avenue. The property located at 123 Queens Avenue is shown by red arrow.



Image 7 – 1988 Aerial showing Queens Avenue and the vacant lot at 134 Carling Street. The property located at 123 Queens Avenue is shown by red arrow.

Appendix C – Heritage Impact Assessment

Stantec, Heritage Impact Assessment 123 Queens Avenue, City of London, Ontario
(March 26, 2019) [attached separately].