Response of LACH Working Group to Item 5.4 on the Nov 13<sup>th</sup> 2019 Agenda regarding the Heritage Impact Statement (Golder Associates May 13<sup>th</sup>, 2019) for 556 Wellington St

LACH does not agree with or support the findings of the HIA for the following reasons:

**HCD Guidelines for West Woodfield** (WWHCDP) state: 'a new building should be sensitive to and compatible with the existing cultural heritage landscape through attention to height, built form, setback, massing, materials and other architectural elements'.

It is considered that none of these criteria have been met.

**Height**: WWHCDP states that the 'City Hall Precinct' (which includes the lands of 556 Wellington St) consider new development to be of 3 storeys adjacent to Wolfe St and Princess Ave and 8-10 facing Dufferin and Wellington. The majority of the surrounding buildings are of 2 storeys.

**Built Form:** Table 3 of the HIA 'Assessment Direct and Indirect' admits that this development will be a 'significant alteration to the existing character of the HCD' but saying that setbacks align to streets and that the podium is in scale. This committee believes that the whole building is not in scale with a huge massing and height that bear no relation to the surroundings.

**Setback:** The setback may be compatible with (or slightly larger than) the much smaller residential properties adjacent but are meaningless for a property of this huge size and height. It is at a 'zero lot line'.

**Massing:** LACH considers that in Table 4 of the HIA "Design Guidelines' the guideline to 'match setback, footprint, and massing patterns to the immediately adjacent neighbours' has not in any way been met — the scale of the main building is  $50 \times 70 \text{m}$  and the height of 18 storeys which does not accord at all with the residential buildings of the HCD.

The 'stepbacks' of the building which are intended to accord with neighbouring properties are not sufficient to bring the proposed development into compatibility with nearby buildings. In addition the 'stepbacks' have far less use for a building that overlooks a public space — Victoria Park - where the views are much longer, creating significant visual impact for it. The building's massing cannot be considered just from street level but from surrounding properties, including Victoria Park.

The podium has been designed to fit in with the height of the surrounding streetscape but it is part of the appearance of a very large, bulky and dominant building. In particular this building will be eminently visible from a distance, that is from Victoria Park, which will negate the desired effect of the podium.

The parking garage is expected to be 'screened' – but a 5 storey height is going to require very large trees, hedges and very tall fences. The shadow impact statement demonstrates that shadows will fall considerably on the neighbouring buildings. It is noted that there is no Winter Solstice study included.

The large footprint is that of a very substantial monolith and ancilliary buildings of such a scale that will overlook, dominate and overwhelm the surroundings. The massing is bulky, crowded and not consistent with the residential character of the HCD. In addition no attempt has been to transition the building into the surrounding built heritage landscape. The stepbacks do not achieve this.

**Materials:** It is noted in the HIA that the building 'uses materials similar to those found throughout the HCD'. The WWHCDP states that new residential buildings should 'use materials and colours that represent the texture and palette' of the neighbourhood. The HIA states that building cladding material is not common in the HCD but is found on 'several large buildings close to the property including London City Hall, Centennial Hall, Central Secondary School and Centennial Towers'. LACH notes that these are not appropriate comparators, as they do not reflect the predominant building materials throughout the HCD, nor do they reflect the heritage character of the HCD.

**Other architectural elements:** No 'traditional details' of the heritage houses surrounding have been, or could be, incorporated into a project of this scale and massing. The application of a narrow 'decorative cornice' on part of the second and fifth storey fails to achieve this.

THE HIA Table 4 also states that the development is compatible with WWHCDP design guidelines which state that the 'size, shape, proportion and placement of windows and doors should reflect common building patterns and styles of other buildings in the immediate area'. This HIA notes that the window size, shape and placement is consistent with that of Centennial Hall. Once again this is not an appropriate comparator and does not reflect the predominant style and heritage character of the HCD.

The WWHCDP further comments on 'visual setting (including significant views or vistas to or from a protected heritage property)'. And the *London Plan* speaks of protecting cultural heritage and includes 'public spaces and landscapes as well as buildings'. It is notable that the views from Victoria Park in particular will be impacted by this development as well as the adjacent properties on Wolfe St.

The statement did not adequately address the impact on Victoria Park and its heritage attributes – the development has potential to impact significant archeological resources of this historic City park.

It is also to be noted that a *Victoria Park Secondary Plan* is about to be implemented and this has included substantial city-wide input.

The LACH considers the conservation of the heritage character of the West Woodfield Heritage Conservation District to be fundamental to good land use planning for this site.