

2 February 2020

Project No. 19116445-L02

Laura Dent, Heritage Planner

City of London
 Development Services - Current Planning
 PO Box 5035, 300 Dufferin Avenue
 London, Ontario
 N6A 4L9

**RE: RESPONSE TO CITY OF LONDON’S MEMORANDUM (26 NOVEMBER 2019)
 556 WELLINGTON STREET, CITY OF LONDON, ONTARIO**

Dear Laura,

This letter is provided in response to the City of London’s memorandum dated November 26, 2019 regarding the proposed development at 556 Wellington Street, a 0.6 hectare property currently being used as a parking lot and located within the West Woodfield Heritage Conservation District (HCD).

Golder Associates Ltd. (Golder) completed a Heritage Impact Assessment (HIA) in May 2019 for GWL Realty Advisors Inc., which concluded that the proposed development would have direct and indirect impacts to the West Woodfield HCD in terms of alterations, land disturbance, and shadows. However, design of the proposed development has included elements intended to complement the heritage character of the West Woodfield HCD while following development guidance from the City’s Zoning By-law. Direct and indirect impacts from the proposed development can be mitigated through design and construction mitigation practices. Golder therefore recommended to monitor for construction vibration at the property boundaries as per the City’s Development and Construction Standards.

On September 26, 2019 Golder provided one round of comments in response to a City of London memorandum from July 11, 2019.

Table 1 presents the City’s comments from November 26, 2019 on the HIA and Golder’s responses.

Table 1: City Comment and Golder Response

| # | City Comment | Golder Response |
|----|---|--|
| 01 | The intent of the West Woodfield HCD Plan is to maintain the predominantly low-density, | Acknowledged and addressed in Golder’s first comment response letter of Sept 26, 2019. |

| # | City Comment | Golder Response |
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| | residential character of the district. | Golder's HIA recognizes the challenges in reconciling the proposed development with the predominately low-density character of the district. 556 Wellington Street is one of the places in the district that the HCD Plan recognizes for more dense development (West Woodfield HCD Plan section 5.10.2). Although the proposed development is denser than suggested in the plan the HCD Plan does not prescribe a maximum height and the proposed development has attempted to mitigate potential adverse impacts through design. Since the proposed development is on a property currently used for parking no low-density residential form houses will be removed and the majority of the HCD will retain its low-density residential character. |
| 02 | There is some latitude in the HCD Plan for increased heights and density for redevelopment purposes. However an 18 storey high-rise, slab tower form is outside of the range of height of the surrounding 2-3 storey heritage homes. | Acknowledged. This has been discussed in comments 2 and 3 of Golder's September 26, 2019 comment response letter. The height of the proposed development is 12 to 18 stories as opposed to 2 to 3 stories and therefore different from the adjacent houses. The rear building part of the proposed development that is adjacent to the houses on Princess Avenue and Wolfe Street is 12 stories. The proposed development will have a steep transition from adjacent properties. However, the design of the development includes measures to mitigate the transition such as the podium base with stepped back sections above it. String courses and cornice around the podium visually divide the levels into visually smaller sections. These design elements are intended to mitigate and balance some of the effect the building will have on the heritage character of the HCD. |
| 03 | The impacts on adjacent properties on Wolfe Street and Princess Avenue will be overwhelming and not compatible with the smaller, highly detailed scale and heritage character of the district. | <p>Addressed in Golder's comment response letter of September 26, 2019. The Wolfe Street properties were included in Golder's HIA and recognized as Part IV and Part V heritage properties (see Figure 13). Golder must follow the interpretation of 'adjacent' as noted in the City of London's <i>Official Plan</i> which identifies adjacent lands as those lands that are contiguous and lands that are directly opposite a protected heritage property, separated only by a laneway or municipal road.</p> <p>Although many are not 'adjacent', Golder still considered the properties on Wolfe Street in the impact assessment as properties that will be minimally impacted by shadows from the proposed development. However, only the adjacent properties at 560-62 Wellington Street, 300 Princess Avenue, and 295 Wolfe Street are explicitly addressed in the impact assessment as adjacent properties. None of these properties are dual designated and the HIA found there would be minimal potential for adverse impacts from the proposed development which would be temporary and limited to potential vibration. These impacts can be mitigated through site controls and vibration monitoring.</p> |

| # | City Comment | Golder Response |
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| 04 | More careful transitioning to the scale of the surrounding context, and consideration for a lower height tower and rear portion should also be considered. | Acknowledged. This is a suggestion for GWL to address with their planners, architects and designers. Golder's HIA was based on renderings provided on March 27 and April 10, 2019. |
| 05 | The HIA needs to clearly address how the proposed 5-storey podium is compatible in scale to adjacent heritage homes and identify the potential impacts and mitigation measures. | The five-storey podium is in scale with 560 Wellington Street which is on the northeast corner of Wolfe and Wellington Street. Golder acknowledges that the podium is higher than residential form buildings on Wolfe Street and Princess Avenue. However, the cornice around the fifth storey lines up with the building at 560 Wellington street and the decorative string course around the building at the second storey level is intended to approximately line up with the roof lines of nearby house form buildings in the HCD giving a sense of visual continuity. |
| 06 | Aligning the setback of the development along Wolfe Street with the existing heritage homes can help mitigate the impact of scale and form of the development | Acknowledged. It is Golder's understanding that the setback of the proposed development along Wolfe Street is approximately 8 m and that the average setback of other buildings along the street is approximately 11 m. The difference of approximately 3 m is relatively small. |
| 07 | What is absent from these design measures is a description of what the character of the district precisely is and the attributes the development is trying to be compatible with. | <p>It is understood that the architectural character of the HCD is heavily influenced by Queen Anne, Edwardian and Italianate styles of architecture. The streetscape character is intimate with large mature trees lining the streets and a canopy over streets and front yards. It is understood that most buildings in the area are brick. Different colours of brick from buff to red are common. The architectural styles common in the district have front porches, decorative gables, projecting bays, recurring window styles and patterns. The houses in the district are oriented to the street and corner lots tend to have details of architectural interest facing both streets.</p> <p>It is understood that the proposed development is not one of the styles mentioned above and does not include many of the fine-grained details of the aforementioned styles. However, it is oriented to both streets it faces and includes a colour palette and some materials that are common throughout the district. Materials in the district include stone, brick, stucco and wood. Common colours include buff and red brick, and painted woodwork and stucco in common heritage colours such as subdued tones of red, brown, blue, green, grey and white. The proposed development includes red brick cladding similar to the building at 560 Wellington Street, along with cladding in subdued tones of white and grey. At street level the proposed development includes stone and brick. The design of the proposed development includes plain sills and lintels and cornices and trim that is relatively plain. It is simpler than many of the</p> |

| # | City Comment | Golder Response |
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| | | <p>Queen Anne, Edwardian and Italianate house form buildings nearby, but the podium base has similar features as the building across Wolfe Street at 560 Wellington Street. String courses and cornice on the proposed development are consistent with the styles of building found throughout the district. This is a modest approach that includes a few design elements consistent with the heritage character of buildings in the district while remaining relatively plain and therefore not distract from the character of the HCD.</p> |
| 08 | <p>Golder will provide shadow studies that reflect the revised design from April 2019</p> | <p>Shadow studies have been supplied by GWL. Golder addressed shadow impacts from shadow studies provided by GWL. However, based on the study provided to Golder, it is understood that while there will be shadows cast from the proposed development onto nearby buildings, the shadows will not be dark enough or last long enough to have an adverse impact on the mature trees important to the streetscape. Nor will shadows be adverse enough to affect gardens or lawns on nearby properties.</p> |
| 09 | <p>Loss of views, the potential loss of views which is integral to the Park and Victorian character of the district is worthy of further consideration or study.</p> | <p>As discussed in Table 3 of the HIA, any development on the property will obstruct views from the east towards Victoria Park and from the Park to the residential area to the east because the property is currently open with an at grade parking lot on it. Golder could not find any discussion in City documents about important views across this property. Since 556 Wellington Street is considered development land the City has envisioned some form of building on the site which will change current views. Golder could find no evidence to suggest the loss of views across the property would be a significant adverse change to the character of the district Golder could not identify any significant focal points from 556 Wellington Street to or from Victoria Park. No significant gateways into the park were identified near the proposed development. Wolfe Street does terminate at the Park, but there is no gateway or entrance infrastructure at this terminus nor will any views from along Wolfe Street be blocked by the proposed development. Since no significant views were identified in the HCD Plan additional identification and evaluation of views across the property was beyond the scope of the HIA.</p> <p>Renderings showing various perspectives and views were provided and referenced in the HIA (see Figures 14 to 19). The visual connections between each built heritage resource on Wellington Street, Waterloo Street, Wolfe Street, and Princess Avenue were not identified by the City as significant to the development of each property or the properties in their entirety, and the viewscape across the property from Victoria Park has not been previously identified by the City as significant.</p> |
| 10 | <p>The proposed development has the potential of separating and</p> | <p>The potential is acknowledged, however it is understood that the proposed development will include a setback of approximately 8 m from Wolfe Street,</p> |

| # | City Comment | Golder Response |
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| | isolating the western edge of the district from the Park which could potentially impact the quality of the environment. | and, therefore, there will be no change to access from the eastern part of the HCD to Victoria Park along that route. The HCD also extends north several blocks from the proposed development, so there will be no separation from the HCD and Park north of Wolfe Street. It is Golder's understanding that the Park and HCD will still be connected regardless of what is developed at 556 Wellington Street. |
| 11 | The MTCS InfoSheet #5 (p3) does not precisely identify 'visual obstruction' as a negative impact but notes that the list is not limited to the (8) mentioned impacts and allows for others to be identified. | Acknowledged. Golder specified in the HIA methodology that impacts would be assessed using provincial guidance and municipal policies. There are many potential impacts not included in the provincial list. Golder did not find terms of reference for heritage impact assessments from the City of London to inform the impact assessment and without such guidance can not assess unknown potential impacts. In Table 3 Golder acknowledged that any development on the site will result in obstruction of views of Victoria Park. However, the viewscape across the property has not been identified in any City documents or plans as being significant. Furthermore, these lands are development lands which indicates that something should eventually be built here and anything that is built will obstruct views across the property since it is currently a parking lot. |
| 12 | The HIA should explicitly address this concept of 'perceived isolation' and the quality of experience and impacts of obstruction on property at this park-edge of West Woodfield. | Without published guidance from the City defining 'perceived isolation' Golder cannot address this concept. Please also see Golder response #11 (above). The HIA follows the MTCS definition of 'isolation', being the isolation of a heritage attribute from its surrounding environment, context, or a significant relationship (see Section 7.2). 'Perceived isolation' is not defined in City documents, and as such, Golder assessed impacts as per the guidance provided in the MTCS <i>Heritage Resources in the Land Use Planning Process</i> (2005). As noted above, the view of Victoria Park from the properties on Wolfe Street, Waterloo Street and Princess Avenue are not identified as heritage attributes of either the park, the individual properties or West Woodfield HCD. The visual connections between each built heritage resource were not identified by the City as significant to the development of each property or the properties in their entirety. |
| 13 | Development staff are not in agreement with the conclusion that: the height and massing of the proposed development has incorporated design measures to mitigate impacts. | Acknowledged. Golder reiterates that the setback from the street, step back levels above the podium base, use of cladding materials such as brick, decorative details including a string courses and cornice are measures intended to mitigate impacts to the character of the HCD. |

| # | City Comment | Golder Response |
|----|---|---|
| 14 | Development staff are not in agreement with the conclusion that: the proposed development is compatible with the heritage character of the West Woodfield HCD. | Acknowledged. Golder reiterates that the proposed development has included measures to mitigate impacts to the character of the HCD (see comment response #7). |
| 15 | Development staff are not in agreement with the conclusion that: no adverse impacts to Victoria Park, the WWHCD and adjacent heritage properties will result from the proposed development. | Acknowledged. Golder reiterates that the proposed development has included measures to mitigate impacts to Victoria Park, the WWHCD and adjacent heritage properties. In Section 7.2, Table 3 of the HIA Victoria Park is explicitly addressed. It was found that none of the heritage attributes of Victoria Park are expected to be impacted due to destruction, alteration, shadows, isolation, direct or indirect obstruction, or a change in land use. |
| 16 | Staff is requesting that additional studies/drawings be prepared to better illustrate the surrounding context, with specific attention to new development and the charactering and relationship of existing heritage homes, West Woodfield and Victoria Park. | It is Golder's understanding that no additional studies or drawings will be prepared at this time. |

In conclusion, Golder understands that the proposed development is larger than the West Woodfield HCD Plan envisioned for development on this site. Golder acknowledges that the City recommends additional design work to increase compatibility between the proposed development and the character of the HCD. Compatibility and sensitivity to the broader surrounding context is an important component of any infill proposal within an HCD and adjacent to significant cultural heritage resources. However, the HIA noted that the height and massing of the proposed development, although larger than the existing surrounding properties within the HCD, has incorporated design measures to mitigate impacts. Golder reiterates that we do not expect adverse impacts to Victoria Park from the proposed development.

Respectfully submitted,
Golder Associates Ltd.



Benjamin Holthof, M.Pl., M.M.A. CAHP
Cultural Heritage Specialist



Michael Teal, M.A.
Associate, Senior Archaeologist

BH/MT/ly

CC: Heather Garrett, Zelinka Priamo Ltd.
Agnes Sliwa, GWL Realty Advisors Inc.

Attachments: Attachment A – City of London Memo dated November 26, 2019

https://golderassociates.sharepoint.com/sites/103556/deliverables/03_co2/19116445-I02-rev1_2feb2020-556_wellington_street_response_letter.docx

ATTACHMENT A

City of London Memo dated
November 26, 2019



MEMO

To: Dan Fitzgerald, Planner II

From: Laura E. Dent, Heritage Planner

Date: November 26, 2019

**Re: 556 Wellington Street (SPA19-046)
2nd Submission Review Comments
Heritage Impact Assessment (addendum)
Heritage Commenting**

Overview

Development Services – Heritage Planning has completed its review of the addendum to the Heritage Impact Assessment (HIA) dated September 26, 2019 – prepared by Golder Associates Ltd. on behalf of GWL Realty Advisors – and submitted as part of the above noted site plan application. In response, staff provides the following comments, noting that the following comments are in addition to those previously submitted by staff (July 11, 2019) and should be read and understood together.

Scale, height and form (character and quality) of new development

Notwithstanding the use of the term ‘perhaps’ in Policy 5.10.2 (*WW HCD*), the intent of the West Woodfield Heritage Conservation District Plan (*Plan*) (as considered in all parts – its goals, objectives, policies and guidelines) is to maintain the predominantly low-density, residential character of the district (West Woodfield). The *Plan* recognizes that there are some areas of West Woodfield where other uses and forms of development may be appropriate. Yet the focus remains on land use goals and objectives that primarily support this low-density residential character while mitigating the potential impacts of nonresidential or higher intensity residential uses (*WW HCD*, 3.1). Further, development pattern policies identified in the *Plan* are also consistent with land use goals and objectives by ensuring that the low-density, residential land use character remains dominant, and that new land uses are consistent with the general residential character of the district (*WW HCD*, 4.1).

There is some latitude provided in the *Plan* for increased heights and density for redevelopment purposes (i.e. infill and vacant lots). However, an 18-storey, high-rise, slab tower form is outside the range in height of the surrounding 2-3 storey heritage homes. Further, there is little or no buffering or effective transitioning in height and form to the adjacent, low-rise heritage homes. For example, the rear portion of the development is nearly ‘butt-up’ against the heritage home at 300 Princess Avenue, with what appears to

be not much more than 10-12 feet between a 12-storey high-rise, including a 5 storey parking structure abutting a 2 ½ -storey heritage home. The rear of other Wolfe Street properties will similarly be impacted with 295 Wolfe Street being adjacent to rear servicing and parking access with no buffering. Even with a 5-storey podium and step backs of the tower form, the immensity of the height and scale of the development, and impacts on adjacent properties on Wolfe Street and Princess Avenue, will be overwhelming and not compatible with the smaller, highly detailed scale and heritage character of the district. The Wolfe Street podium façade (at the rear portion) reflects the utility of a parking garage as does the façade that is adjacent to Princess Avenue; both facades are not compatible with the heritage character of the district

The use of an architectural vocabulary that relies on a podium base, mid-section and cap – along with step backs – can be successful in strengthening a pedestrian scale and mitigating impacts of high-rise development at the street level. This mitigative approach however, is much more effective in a typical downtown area that is dominated by mid to high-rise development. At 556 Wellington Street, this architectural vocabulary can partially mitigate the impacts of height and form, but more careful transitioning to the scale of the surrounding context, and consideration for a lower height tower and rear portion, should also be considered (i.e. 3-stories rising to 8-10 – as suggested in the WW HCD and consistent with the Victoria Park Secondary Plan). The HIA needs to clearly address how the proposed 5-storey podium is compatible in scale to adjacent heritage homes, and identify the potential impacts and mitigation measures. Further, aligning the setback of the development along Wolfe Street with the existing heritage homes (295-303+ Wolfe St) can also help to mitigate the impact of scale and form of the development, making the development more compatible with the surrounding context, and helping to widen the frame of view from Wolfe Street to Victoria Park.

The HIA addendum notes several design measures used to mitigate the impact of the scale and form of the proposed development, and enhance its compatibility with the heritage character of the area:

- a podium design that is divided vertically to replicate rhythm of existing streetscape resulting in more compatible with scale of adjacent buildings, and
- the use of similar materials that compliment and is compatible with most design guidelines in HCD.

What is absent from these design measures is a description of what the character of the West Woodfield Heritage Conservation District precisely is and the attributes the development is trying to be compatible with; the district's unique forms and features; the common rhythm and character of its streetscapes; the materials that are typically used and its colour palette; and an understanding of the character of the district, and how this residential character is translated into the architectural vocabulary of a high-rise, in a

meaningful, site specific manner. All the above, are critical to substantiating design compatibility as measure to mitigate the larger form and scale of this development.

Shadow studies

Golder will provide shadow studies that reflect the revised design from April 2019. Any negative impacts should be noted and mitigative measures proposed.

Views and visual obstruction/isolation of heritage resources (Victoria Park and Wolfe Street Properties)

Previous comments by DS-Staff identified the importance of views and the negative impacts of what was termed ‘visual obstruction’ as it relates to this development. No specific views were identified in the *WW HCD Plan*; however, views and their integration with streetscape and landscaping as part of the character of West Woodfield is described in the *Plan* (9.1). Particularly noted is the potential ‘loss of views’ where zoning permits higher buildings, with the suggestion that studies evaluate potential loss of views should be conducted and measures be taken to mitigate the potential effects (4.3(d); 8.2.3). Within the context of the Victorian styling prominent in the district and character of the Park, the framing of views is also important as it provides viewing opportunities from the heritage homes to the gardens [and by association, the park]. Although no specific views were identified in the Victoria Park designating by-law, this is certainly not unusual given the date of the by-law being prior to the approval of the *Victoria Park Restoration Master Plan* (Restoration Master Plan) in 2005. As a Victorian-styled park, the Restoration Master Plan identified focal points, entrances and gateways to the park as important elements to re-establish the unique status of the Park – providing interesting destination points within the concept of a heritage strolling park and future revitalization plans. Visual connections between specific heritage buildings and Victoria Park and specific views across Victoria Park have not been previously identified, but have been noted as important in City documents. The potential loss of views – which is integral to the Park and Victorian character of the district – is worthy of further consideration and study. To date, no comprehensive study has been provided as part of this HIA or addendum to evaluate the potential loss of views/viewsapes and propose mitigating measures.

‘Visual obstruction’ of heritage resources is associated with the above mentioned concept of the viewscape. Obstruction, whether physical or visual, can be understood as a barrier which isolates heritage resources from their relationship with Victoria Park (particularly at the western edge of the WW HCD along Waterloo Street); this relationship is mutually supportive and is integral to the character of both the WW HCD and Victoria Park. The new development at 556 Wellington Street – due to its form, scale and height – has the potential of separating and isolating the western edge of the district from the Park which is not only a Part IV designated property, but a resource of West Woodfield as well. This isolation could potentially impact the quality of the environment and Londoners’ experience of their City. City policies do not specifically note visual obstruction, but do

place importance on relationships and the concept of connectivity and view corridors. The MTCS InfoSheet #5 (p3) does not precisely identify 'visual obstruction' as a negative impact, but notes that the list is not limited to the (8) mentioned impacts and allows for other impacts to be identified. Staff recognizes that new development at 556 Wellington Street considers the pedestrian experience at grade on the subject site, but the HIA has not fully considered broader impacts on the potential loss and obstruction of views due to the scale of the development and the resultant pedestrian experience and quality of the environment. Staff reiterates that the HIA should explicitly address this concept of 'perceived isolation', and the quality of experience and impacts of obstruction on properties at this park-edge of West Woodfield.

Conclusions

Based on the review of the addendum to the heritage impact assessment, Development Services staff are not in agreement with its conclusions, specifically that:

- the height and massing of the proposed development, although larger than the existing surrounding properties within the HCD, has incorporated design measures to mitigate impacts;
- the proposed development is compatible with the heritage character of the West Woodfield Heritage Conservation District; and,
- no adverse impacts to Victoria Park, the West Woodfield Heritage Conservation District and adjacent heritage properties will result from the proposed development.

Golder will provide shadow studies that reflect the revised design from April 2019. Any negative impacts found should be noted and mitigative measures proposed.

In addition to previous comments provided (July 11, 2019), staff are reiterating that consideration still be given to:

- establishing a maximum height of up to 10 stories for the proposed development; a height that is compliant with the intent and direction of goals, objectives, policies and guidelines of the *WW HCD Plan* (5.10.2);
- better transitioning of height and form from the new development to adjacent lower scale neighbouring building typologies, noting that the *WW HCD Plan* (5.10.2) recommends a maximum of 3-stories adjacent to existing properties on Wolfe Street and Princess Avenue; and,
- aligning the setback of the development along Wolfe Street with the existing heritage homes (295-303+ Wolfe St)

Finally staff is also requesting that additional studies/drawings be prepared to better illustrate the surrounding context, with specific attention to new development and the charactering and relationship of existing heritage homes, West Woodfield and Victoria Park:

- A street level view (rendered perspective) looking west from Wolfe Street to Victoria Park showing corner of development at the intersection of Wolfe and Wellington Streets and south side of Wolfe Street (295-303), making sure to indicate broader context in background
- A street level view (rendered perspective) looking west from Princess Avenue showing corner of rear portion of development and north side of Princess Avenue (300-308), making sure to indicate broader context in background.
- A series of view studies at the western edge of the WW HCD along Waterloo Street looking generally westward towards the subject development site and Victoria Park.

Additional Comments Related to Application

The London Advisory Committee on Heritage (LACH) was circulated on the Heritage Impact Assessment (and addendum) and is currently reviewing the report. The LACH will be providing comments to Council as part of their minutes to the Planning and Environment Committee (PEC) on January 6, 2020.

The applicant should consider submitting a heritage alteration permit application (HAP) as soon as possible, noting that issues brought up within staffs' comments will be likely be integral to staff's review of the HAP. Permit approval is a requirement of Site Plan approval and requires review by the London Advisory Committee on Heritage (LACH) and Municipal Council approval. Heritage alteration permit approval is also required prior to issuance of a Building Permit.

Please advise if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura E. Dent', written in a cursive style.

Laura E. Dent

Development Services
Heritage Planner
M.Arch, PhD, MCIP, RPP