

LACH

Working Group for 850 Highbury Ave OPA/Draft Plan of Subdivision

Thursday, April 22, 2021, 7:30pm-9:00pm

Location: Online

Present: S. Bergman, L. Fisher, J. Manness, E.J. Rath, M. Walley,

DRAFT RECOMMENDATION TO LACH:

- 1) THAT the following recommendations of the 850 Highbury Ave (London Psychiatric Hospital Lands) Working Group be accepted by LACH, it being noted that:
 - a. Sufficient information has not been received as part of the application in order to appropriately assess the impacts of the proposed applications on the significant heritage resources on this property. With respect to the HIA provided, LACH notes the following:
 - i. The HIA should be prepared by a qualified heritage professional.
 - ii. The HIA should include an assessment of impacts to identified heritage resources of the proposed development, among other content as identified in Info Sheet #5 provided by the Ministry of Heritage, Sport, Tourism and Culture Industries. The HIA provided with the application does not speak to the impacts of the proposed development or proposed policy changes on the cultural heritage resources on the site.
- 2) LACH is supportive of maintaining the overall land use concept identified within the proposal, which is generally consistent with that in the London Psychiatric Hospital Secondary Plan (LPHSP). This includes the proposed low density residential in the core area with concentration of higher densities along adjacent arterial roadways (the 'bowl' concept) and the revisions to the road and pedestrian networks, which appear to support the protection and enhancement of the cultural heritage resources.
- 3) LACH emphasizes the need to consider the built heritage resources as landmarks within the cultural heritage landscape, and that the assessment of impacts must address the cultural heritage landscape including views and vistas as described through the appropriate governing documents.
- 4) LACH acknowledges the differences or 'inconsistencies' between elements of the Heritage Conservation Easement, designating by-law L.S.P.-3321-208, and the LPHSP as identified within the HIA, but notes that these documents each have different forms and functions, and do not necessarily conflict (save for mapping discrepancies). Where these differences or 'inconsistencies' are identified, the more detailed description and assessment should apply.
- 5) LACH does not support many of the proposed changes to heritage policies within the LPHSP which serve to reduce protection of the heritage resources and introduce greater uncertainty. We note that sufficient rationale or justification for these revisions to heritage policies have not been provided within the Final Proposal Report or HIA. Examples include but are not limited to:
 - a. LPHSP 20.4.1.4 – "Retain as much of the identified cultural and heritage resources of the area as possible *feasible*."
 - b. LPHSP 20.4.1.5.II.a) – "provide for ...and mixed-use buildings *where possible*."

- c. LPHSP 20.4.2.2 – “Development proposed through planning applications... will need not only to consider the significant heritage buildings, but also the unique cultural heritage landscape *where possible.*”
 - d. LPHSP 20.4.3.5.2.III. d) “Built form adjacent to the Treed Allee within the Heritage Area ~~shall~~ *should be encouraged* to oriented towards the Allee in applicable locations.”
 - e. LPHSP 20.4.4.10 - “shall” to “should”
- 6) LACH requests clarification from City Heritage and Planning staff on the next steps with respect to this development application, including how the impacts to built heritage resources and the cultural heritage landscape will be assessed and addressed as the planning and design phases progress. For example, can/will an HIA be required for subsequent zoning bylaw amendment applications and/or site plan applications? LACH respectfully requests that these assessments be provided to LACH for review and comment.
 - 7) LACH respectfully requests to be consulted early on any proposed changes to the designating bylaw or heritage conservation easement and would welcome a delegation from the proponent to present on heritage matters on the property.
 - 8) LACH requests information from City Staff and/or the proponent on the current physical conditions of the heritage structures on the site.