

## Report to Community Advisory Committee on Planning

**To:** Chair and Members  
Community Advisory Committee on Planning

**From:** Jana Kelemen, M.Sc.Arch., MUDS, RPP, MCIP  
Manager, Urban Design and Heritage

**Subject:** Demolition Request for Heritage Listed Property at 254 Hill Street, by Level Contracting Inc.

**Date:** July 13, 2022

### Summary of Recommendation

The demolition request by Level Contracting Inc, to demolish the built resources at 254 Hill Street is recommended for approval based on heritage research, evaluation and conclusions outlined in the heritage impact assessment submitted with the demolition request.

### Executive Summary

A demolition request was received for the heritage listed property at 254 Hill Street. The subject property is listed on the City's *Register of Cultural Heritage Resources*. A demolition request for a building or structures on a heritage listed property triggers a formal review process pursuant to the requirements of the *Ontario Heritage Act* and the Council Policy Manual. A heritage impact assessment (HIA) was submitted with the demolition request for the property. The HIA determined that the property at 254 Hill Street does not retain historical/associative or contextual value and that although the built resource on the property may be a representative example of the Italianate style, it is a relatively vernacular interpretation of the style and there are stronger examples in the City. As well, due to its compromised structural integrity and the safety hazards of the existing structure, the suggested mitigation approach to demolition is documentation of the existing built resource and salvaging of materials from the structure. Staff have reviewed the heritage impact assessment and do not disagree with the conclusions of the HIA, and staff is not recommending designation of this property.

## Analysis

### 1.0 Background Information

#### 1.1 Property Location

The property at 254 Hill Street is located on the north side of Hill Street, between Clarence and Wellington Streets (Appendix A). The property is located "South of Horton", an area colloquially known as SoHo which has a long history in the City of London. SoHo maintains its character as a distinctive, early working-class neighbourhood, and retains many late 19<sup>th</sup>-to early 20<sup>th</sup> century buildings along with newer infill development. The SoHo area has been identified in *Heritage Places 2.0* as a potential candidate for a future Heritage Conservation District.

#### 1.2 Cultural Heritage Status

The property at 254 Hill Street is a heritage listed property, included on the City's *Register of Cultural Heritage Resources*. The property is of potential cultural heritage value. The listing of the property on the City's *Register* came into force and effect on March 26, 2007.

#### 1.3 Description

The property at 254 Hill Street measures approximately 17m x 60m (56' x 197') (Appendix A). There are several vacant lots within the vicinity of the property as well as several newer infills and parking lots (Appendix B).

The building at 254 Hill Street is positioned at the crest of an embankment on the north side of Hill Street with a concrete drive located on the west side of the property. There is a wooden outbuilding (4m x 6m) located in the rear yard.

The building on the property is a two-storey, buff brick vernacular house exhibiting Italianate design elements with a low-pitched hip roof and overhanging eaves. There is a rear (north) projection with a medium pitched gable roof, and a small added entrance vestibule on the east side at the rear projection.

The front (south) elevation is framed by a continuous buff brick pilaster running along the corners of the elevation and just below the overhanging eave. A porch extends across the entire front elevation and is supported by concrete blocks and wooden posts. The primary entrance is from the porch which appears to be an original wooden door and surround unit comprised of sidelites, transom and wooden infill panels. Two rounded pilasters are positioned in the transom and mirror the door and sidelite geometry. The entrance is currently boarded-up.

Most all windows openings throughout consist of shallow-arch openings with brick voussoirs and wood sills. A singular arched window opening is located on the east elevation and contains a double row of brick voussoirs. Some existing window openings have been blocked in with brick, and openings on the first floor have been boarded up. Many of the window frames that are visible appear to be two-over-two (2/2) wooden frames; many of these have been installed with aluminum storms. The building on the property is currently vacant and is in a deteriorating condition.

Heritage planning staff conducted a site visit and photo-documented the property and built resources on June 29, 2022.

#### **1.4 Property History<sup>1</sup>**

254 Hill Street is located within the bounds of the original town plot of London near the southeast edge, on a short east-west road running from the Thames River to the border of the town plot at present-day Wellington Street. The road was named Hill Street on the survey map for the town plot and is shown running along a hill that stretched from Grey Street southeast to the end of Hill Street.

The property at 254 Hill Street is located “South of Horton,” an area colloquially known as SoHo which has a long history in the City of London being located along the edges of the Downtown and the Thames River. The early development of SoHo is associated with London’s Black community and later a Jewish community in the early 20th century.

Based on historical mapping and historic research undertaken as part of the heritage impact assessment (HIA), the building at 254 Hill Street was likely built 1861 to 1872. Job Cousins may have been the first occupant at 254 Hill Street. He was a pump maker and foreman who worked with his nephew John Cousins and with his brother James M. Cousins, who was the owner and founder of the family pump manufacturing business. James served as the mayor of London for one year in 1871 and was also known for a role in establishing the Western Fair.

Following Job Cousins, 254 Hill Street was briefly occupied by Randall Mark in 1893, and then by John Wheatcroft in 1895, who was employed as a baggageman with the Grand Trunk Railway. By 1921, 254 Hill Street was occupied by John Gardner, who was the owner of the Union Taxi Service based at 651 Richmond Street. His daughter Lillian would remain at 254 Hill Street into the mid-20th century, residing there in 1955 with a Mrs. M. Corrin. According to land registry records, the Gardner family was no longer associated with 254 Hill Street by 1967. Based on a review of *Google Streetview*, the property was vacated and boarded between 2015 and 2019.

## **2.0 Discussion and Considerations**

### **2.1 Legislative and Policy Framework**

Cultural heritage resources are to be conserved and impacts assessed as per the fundamental policies of the *Provincial Policy Statement (2020)*, the *Ontario Heritage Act*, and *The London Plan*.

---

<sup>1</sup> This section is excerpted from Stantec, 2022 (pp11-16).

### **2.1.1 Provincial Policy Statement**

Heritage Conservation is a matter of provincial interest (Section 2.d, *Planning Act*). The *Provincial Policy Statement (2020)* 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” (Policy 2.6.1, *Provincial Policy Statement 2020*).

“Significant” is defined in the *Provincial Policy Statement (2020)* as, “resources that have been determined to have cultural heritage value or interest.” Further, “processes and criteria for determining cultural heritage value or interest are established by the province under the authority of the *Ontario Heritage Act*.”

Additionally, “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.”

### **2.1.2 Ontario Heritage Act**

Section 27, *Ontario Heritage Act* requires that a register kept by the clerk shall list all properties that have been designated under the *Ontario Heritage Act*. Section 27(1.2), *Ontario Heritage Act* also enables Municipal Council to add properties that have not been designated, but that Municipal Council “believes to be of cultural heritage value or interest” on the Register.

The only cultural heritage protection afforded to heritage listed properties is a 60-day delay in the issuance of a demolition permit. During this time, Council Policy directs that the Community Advisory Committee on Planning (CACP) is consulted, and a public participation meeting is held at the Planning and Environment Committee.

Section 29, *Ontario Heritage Act* enables municipalities to designate properties to be of cultural heritage value or interest. Section 29, *Ontario Heritage Act* also establishes consultation, notification, and process requirements, as well as a process to appeal the designation of a property. Objections to a Notice of Intention to Designate are referred back to Municipal Council. Appeals to the passing of a by-law to designate a property pursuant to the *Ontario Heritage Act* are referred to the Ontario Land Tribunal (OLT).

#### **2.1.2.1 Criteria for Determining Cultural Heritage Value or Interest**

*Ontario Heritage Act* Regulation 9/06 establishes criteria for determining the cultural heritage value or interest of individual properties. These criteria are:

1. Physical or design value:
  - i. Is a rare, unique, representative or early example of a style, type, expression, material or construction method;
  - ii. Displays a high degree of craftsmanship or artistic merit; or,
  - iii. Demonstrates a high degree of technical or scientific achievement.
2. Historical or associative value:
  - i. Has direct associations with a theme, event, belief, person, activity, organization or institution that is significant to a community;
  - ii. Yields, or has the potential to yield, information that contributes to an understanding of a community or culture; or,
  - iii. Demonstrates or reflects the work or ideas of an architect, artist, builder, designer or theorist who is significant to a community.
3. Contextual value:
  - i. Is important in defining, maintaining or supporting the character of an area;
  - ii. Is physically, functionally, visually or historically linked to its surroundings; or,
  - iii. Is a landmark.

A property is required to meet one or more of the abovementioned criteria to merit protection under Section 29 of the *Ontario Heritage Act*. Should the property not meet the criteria for designation, the demolition request should be granted. These same criteria are in Policy 573\_ of *The London Plan*.

### **2.1.3 The London Plan**

The Cultural Heritage chapter of *The London Plan* recognizes that our cultural heritage resources define our City’s unique identity and contribute to its continuing prosperity. It

notes, “The quality and diversity of these resources are important in distinguishing London from other cities and make London a place that is more attractive for people to visit, live or invest in.” Policies 572\_ and 573\_ of *The London Plan* enable the designation of individual properties under Part IV of the *Ontario Heritage Act*, as well as the criteria by which individual properties will be evaluated.

Policies 575\_ and 576\_ of *The London Plan* also enable City Council to designate areas of the City under Part V of the *Ontario Heritage Act* as Heritage Conservation Districts. These policies include a set of criteria in the evaluation of an area. *Heritage Places 2.0* is a guideline document as a part of the Cultural Heritage Guidelines. The document describes potential heritage conservation districts and assigns a priority to these districts for consideration as heritage conservation districts.

#### **2.1.4 Register of Cultural Heritage Resources**

Municipal Council may include properties on the *Register of Cultural Heritage Resources* that it “believes to be of cultural heritage value or interest.” These properties are not designated but are considered to have potential cultural heritage value or interest.

The Register of Cultural Heritage Resources states that further research is required to determine the cultural heritage value or interest of heritage listed properties. The property at 254 Hill Street is included on the *Register of Cultural Heritage Resources*.

### **3.0 Financial Impact/Considerations**

None

### **4.0 Key Issues and Considerations**

#### **4.1. Demolition Request**

Site plan consultation (SPC22-035) with the applicant occurred in March 2022 for a 3-storey apartment building which also includes the adjacent property at 248 Hill Street. The proposed development is predicated on the demolition of the listed built resources on the property at 254 Hill Street which requires Council approval. Written notice of intent to demolish the built resources on the property, along with a required heritage impact assessment (HIA), was received as a complete application by the City on June 16, 2022.

Municipal Council must respond to a notice of intention to demolish a building or structure on a heritage listed property within 60 days, or the request is deemed consented. During this 60-day period, the Community Advisory Committee on Planning (CACP) is consulted and, pursuant to Council Policy, a public participation meeting is held at the Planning and Environment Committee (PEC).

The 60-day period for the demolition request for the property at 254 Hill Street expires on August 13, 2022.

#### **4.1.1 Heritage Impact Assessment**

A heritage impact assessment (Stantec Consulting Corp., dated June 9, 2022) was submitted as a part of the demolition request for the heritage listed property at 254 Hill Street (Appendix C). Heritage planning staff have reviewed the heritage impact assessment and is satisfied with the report’s (analysis, conclusions, and recommendations) and find the heritage research and evaluation to be sufficient to fulfill conditions for (SPC22-035).

The Heritage Impact Assessment found that: *the residence meets only one criterion of O. Reg 9/06 as a representative vernacular Italianate residence. It is one of more than 300 properties listed on the City’s Register that are of the Italianate Style. The building is a vernacular example and does not contain decorative details common to many Italianate structures; there are stronger examples of the Italianate style in the City of London (p35).*

A structural condition evaluation (DC Buck Engineering, 2022) was also included as part of the heritage impact assessment. The report noted damage to the roof, and rotten floor sections and floor joists. In addition, much of the structure was noted to contain

black mold (Appendix C). Conclusions and recommendations state that: *the existing structure at 254 Hill Street poses a safety hazard and should be removed* (p35).

Detailed documentation and salvage are often the preferred mitigation strategy where retention or relocation is not feasible or warranted. For 254 Hill Street, the HIA concluded that documentation and salvage would be an appropriate mitigation measure. This mitigation alternative is appropriate considering that there are similar and stronger remaining examples of Italianate architectural styles in the City of London and that the structure is likely not able to withstand relocation (Stantec, pp35-36)

#### **4.2 Evaluation**

Conclusions of the HIA are that the built resource on the subject property does not retain historical/associative or contextual value. The built resource may be representative of the Italianate style however, it is a relatively vernacular interpretation of the style. There are stronger examples of Italianate residences that contain additional architectural features not found at 254 Hill Street such as paired brackets, decorative cornices, window surrounds, and carved wooden trim that are common to the style.

Conclusions and recommendations state that: the main structure of the existing building is not sound and that its current condition is not safe and poses a hazard to any person entering the building and the surrounding buildings; the recommendation is that the existing structure be removed.

In-situ retention or relocation of the built resource on the property was not recommended due to its compromised structural integrity and the safety hazards of the existing structure. The suggested mitigation approach to demolition is documentation of the existing built resource and salvaging of materials from the structure. Salvaged items mainly include buff brick for possible retention into on-site features or incorporation into the new development.

Staff do not disagree with the conclusions of the HIA.

#### **4.3 Consultation**

In accordance with Section 27(1.3) of the *Ontario Heritage Act*, the Community Advisory Committee on Planning (CACCP) is being consulted at its meeting on July 13, 2022, regarding this demolish request and a decision by Municipal Council is expected at the August 2, 2022, meeting.

It is a policy and practice of Municipal Council that the demolition of a heritage listed property shall be considered at a public participation meeting before the Planning and Environment Committee (PPM). This item will be heard at the July 25, 2022, PPM of the Planning and Environment Committee. Notification of the demolition request was sent property owners within 120m of the subject property on July 4, 2022, as well as to community groups including the Architectural Conservancy Ontario – London Region, London & Middlesex Historical Society, and the Urban League. Further, notice was also published in *The Londoner* on July 7, 2022. At the time of writing, no replies have been received regarding this demolition request.

## **Conclusion**

A heritage impact assessment was submitted as a part of the demolition request for the heritage listed property at 254 Hill Street. The Heritage Impact Assessment found that the built resource on the subject property does not retain historical/associative or contextual value and that although it may be a representative example of the Italianate style, it is a relatively vernacular interpretation of the style and there are stronger examples in the City. Due to its compromised structural integrity and the safety hazards of the existing structure, the suggested mitigation approach to demolition is documentation of the existing built resource and salvaging of materials during demolition of the structure. Staff do not disagree with the conclusions of the HIA, and staff is not recommending designation of this property. The owner of the property is encouraged to consider the salvage of the buff brick during demolition for possible retention into on-site features or incorporation into the new development.

The demolition request by Level Contracting Inc, to demolish the built resources at 254 Hill Street is recommended for approval based on heritage research, evaluation and conclusions outlined in the heritage impact assessment submitted with the demolition request. Approval of the demolition request is being recommended to the Planning and Environment Committee at its meeting on July 25, 2022.

**Prepared by:** Laura E. Dent, M.Arch, PhD, MCIP, RPP  
Heritage Planner

**Submitted by:** Jana Kelemen, M.Sc.Arch., MUDS, RPP, MCIP  
Manager, Urban Design and Heritage

### **Appendices**

Appendix A Property Location  
Appendix B Images  
Appendix C Heritage Impact Assessment

### **Sources**

2022, March 7 – E-mail Correspondence to Leif Maitland, Site Development Planner, from Laura E. Dent, Heritage Planner. re: SPC22-035 – 248-254 Hill Street – Heritage Commenting.

Corporation of the City of London. n.d. Property files: 254 Hill Street Pack Road.

Corporation of the City of London. (2016, consolidated 2022, May 25). The London plan. London, ON: Author.

Corporation of the City of London. (2020, Dec 8). City of London Register of Cultural Heritage Resources. London, ON: Author.

DC Buck Engineering (2022, Feb 17). Inspection Report. Structural Condition Evaluation – 254 Hill Street. London, ON: Author.

Government of Canada. Parks Canada. *Standards and Guidelines for the Conservation of Historic Places in Canada*. 2010.

Ministry of Municipal Affairs and Housing. (2020). Provincial policy statement, 2020. Ontario: Queen's Printer for Ontario.

Ontario Heritage Act, (last amendment 2021, c. 4, Sched. 6, s.74). Retrieved from e-Laws website <https://www.ontario.ca/laws/statute/90o18>

Ontario Ministry of Culture. (2006). *Heritage resources in the land use planning process information sheet series*. "InfoSheet #5, Heritage impact assessments and conservation plans." Ontario: Queen's Printer for Ontario.

Ministry of Culture. (2006). *Ontario Heritage Toolkit: Heritage Property Evaluation*. Ontario: Queen's Printer for Ontario.

Stantec Consulting Ltd. (2022, Jun 9). Heritage Impact Assessment – 254 Hill Street, London, Ontario (final report). London, ON: Author. [Where applicable, see additional sources referenced in report].

# Appendix A – Property Location

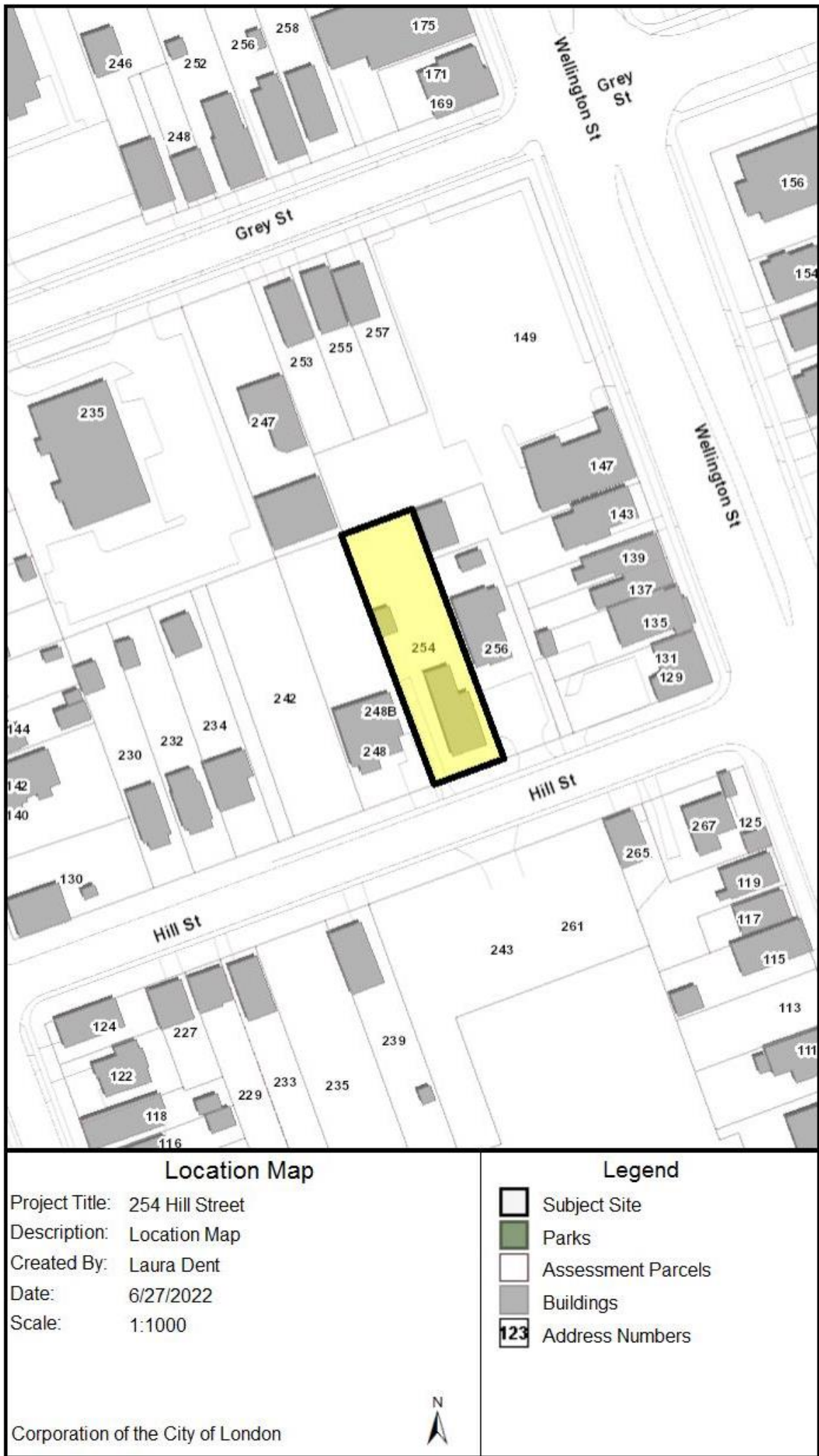


Figure 1: Location of the property at 254 Hill Street

**Appendix B – Images**



Image 1. Front elevation at 254 Hill Street – facing south



Image 2. South-west elevations at 254 Hill Street





Image 3. West elevation at 254 Hill Street



Image 4. Ancillary shed structure in rear yard – 254 Hill Street



Image 5. Rear (north) projection – 254 Hill Street (Stantec, 2022)



Image 6. East elevation showing rear (north) projection and added entrance vestibule



Image 7. East and south elevations featuring arched window and front porch



Image 8. Front elevation showing porch positioned across the full width of the residence



Image 9. Front entrance door surround with transom and sidelites



Image 10. Porch supported by concrete blocks and wooden posts



Image 11. Front elevation at 254 Hill Street showing positioning on embankment



Image 12. 254 Hill Street and adjacent property to the west at 248 Hill Street – both properties comprise the subject lands for the development proposal (SPC22-035)



Image 13. Detail of window opening – 2<sup>nd</sup> floor, west elevation – showing shallow arch with voussoirs and two-over-two (2/2) wooden window frame and wood sill



Image 14: Detail of boarded-up window opening – 1<sup>st</sup> floor, west elevation – showing shallow arch with voussoirs and two-over-two (2/2) wooden window frame and wood sill

## **Appendix C – Heritage Impact Assessment**

Heritage Impact Assessment (Stantec Consulting Ltd., dated June 9, 2022) – *attached separately*