

## Report to Planning and Environment Committee

**To:** Chair and Members  
Planning and Environment Committee

**From:** Scott Mathers, MPA, P. Eng.,  
Deputy City Manager, Planning and Economic Development

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

**Date:** July 25, 2022

## Recommendation

That, on the recommendation of the Director, Planning and Development, with the advice of the Heritage Planner, with respect to the demolition request for the built resources on the heritage listed property at 254 Hill Street, that:

- a) The Chief Building Official **BE ADVISED** that Municipal Council consents to the demolition of the built resources on the property;
- b) The property at 254 Hill Street **BE REMOVED** from the *Register of Cultural Heritage Resources*, and;
- c) The property owner **BE ENCOURAGED** to salvage buff brick during demolition for potential re-use in the current development proposal on the property or heritage conservation projects elsewhere in the City.

## 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.

## Linkage to the Corporate Strategic Plan

This recommendation supports the following 2019-2023 Strategic Plan area of focus:

- Strengthening Our Community:
  - Continuing to conserve London's heritage properties and archaeological resources.

## 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

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

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*.

#### **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 (CACCP) 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 salvage of the buff brick during demolition for possible retention into on-site features or incorporation into the new development.

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Development

### 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*



**Heritage Impact Assessment—  
254 Hill Street, London, Ontario**

FINAL REPORT

June 9, 2022

Prepared for:

Level Contracting Inc.  
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Prepared by:

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Project Number: 160940768

## Executive Summary

Level Contracting Inc. (Level Contracting) retained Stantec Consulting Ltd. (Stantec) to prepare a Heritage Impact Assessment (HIA) for the property located at 254 Hill Street in the City of London (the City), Ontario. Level Contracting is proposing to construct a three-storey apartment building with a total of 23 units and a footprint of 4,928 square feet (457.9 square metres) on the property. . The new structure will be located in the west section of the property and will necessitate the demolition of the current structure at 254 Hill Street.

The *City of London Register of Cultural Heritage Resources* identified 254 Hill Street as a listed property and is described as an Italianate structure built prior to 1868 (City of London 2019). The City's Official Plan requires the preparation of an HIA for developments on or adjacent to listed properties.

The property at 254 Hill Street was determined to demonstrate design/physical value as a representative late 19<sup>th</sup> century vernacular Italianate style residence. The house is a modest representative example of the Italianate style of architecture, evident in its two-storey height, rectangular plan, brick construction, segmental and round arched windows with two-over-two sash double hung wood frame windows, brick voussoirs, wood sills, low-pitched hip roof, and single entrance door with sidelights and transom. The style and type of dwelling is a portrayal of a residential dwelling suited to London's emerging middle class in the 19<sup>th</sup> century.

An assessment of impacts resulting from the proposed undertaking at 254 Hill Street has determined that the proposed undertaking would result in direct impacts to the property through demolition. Based on the adverse impacts identified to this cultural heritage resource, the retention of the residence *in situ* is the preferred alternative method from a heritage perspective since the CHVI of the property would be retained in its entirety. However, retention of the residence is not feasible due to site plan requirements and the poor condition of the residence. A Structural Condition Evaluation concluded the existing structure at 254 Hill Street poses a safety hazard and should be removed. Where retention *in situ* is not feasible or preferred, relocation is often the next option considered to mitigate the loss of a heritage resource. However, the residence is in poor condition and is unlikely to withstand the relocation process. Therefore, relocation is not a viable mitigation measure.

Detailed documentation and salvage are often the preferred mitigation strategy where retention or relocation is not feasible or warranted. For 254 Hill Street, 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.

Documentation activities should be carried out through a full recording of the residence through photography, mapping, photogrammetry, and/or LiDAR scan. Documentation should be carried out in advance of any changes made to the property. Salvage activities should consist of the identification and recovery of re-useable materials by a reputable salvage company or charity, with materials retained to be repurposed on site through landscape and built features. Salvaged materials should include:



## HERITAGE IMPACT ASSESSMENT—254 HILL STREET, LONDON, ONTARIO

- Buff brick
- Segmental arch and round arch windows with brick voussoirs, wood sills, and 2/2 sash wood frame double hung windows

*The Executive Summary highlights key points from the report only; for complete information and findings, the reader should examine the complete report.*



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## Project Personnel

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## Abbreviations

BA	Bachelor of Arts
CAHP	Canadian Association of Heritage Professionals
CHVI	Cultural Heritage Value or Interest
HIA	Heritage Impact Assessment
MA	Master of Arts
MHSTCI	Ministry of Heritage, Sport, Tourism and Culture Industries
N/A	Not Applicable
OHA	Ontario Heritage Act
O. Reg.	Ontario Regulation
PPS	Provincial Policy Statement



June 9, 2022

## 1.0 INTRODUCTION

Level Contracting Inc. (Level Contracting) retained Stantec Consulting Ltd. (Stantec) to prepare a Heritage Impact Assessment for the property located at 254 Hill Street in the City of London (the City), Ontario (Figure 1 and Figure 2). The Study Area is located on the north side of Hill Street and is located approximately 55 metres west of the intersection of Wellington Street and Hill Street. In accordance with Section 27 of the *Ontario Heritage Act* (OHA), the City maintains a register of properties that are of potential cultural heritage value or interest (CHVI). The *City of London Register of Cultural Heritage Resources* identified 254 Hill Street as a listed property and is described as an Italianate structure built prior to 1868 (City of London 2019).

Level Contracting is proposing to construct on the property a three-storey apartment building with a total of 24 units and a footprint of 4,816 square feet (447.5 square metres). The new structure will be located at west end of the property and will necessitate the demolition of the current residence at 254 Hill Street to accommodate parking. The current concept plan for the site is included in Appendix A.

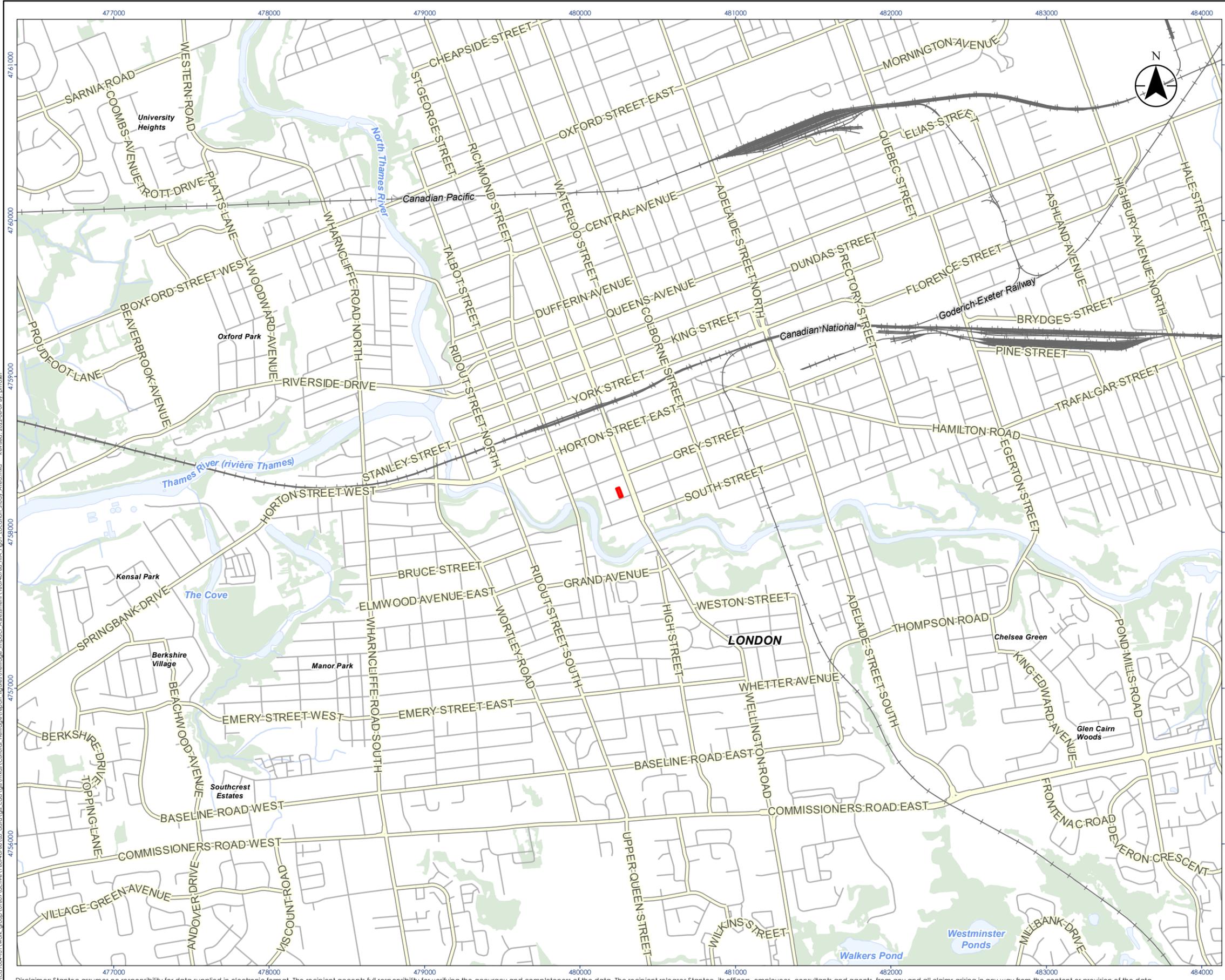
The purpose of the HIA is to respond to policy requirements regarding the conservation of cultural heritage resources in the land use planning process. Where a change is proposed within or adjacent to a protected heritage property, consideration must be given to the conservation of cultural heritage resources. The objectives of the report are as follows:

- Identify and evaluate the CHVI of the Study Area
- Identify potential direct and indirect impacts to cultural heritage resources
- Identify mitigation measures where impacts to cultural heritage resources are anticipated to address the conservation of heritage resources, where applicable

To meet these objectives, this HIA contains the following content:

- Summary of project methodology
- Review of background history of the Study Area and historical context
- Evaluation of CHVI
- Description of the proposed site alteration
- Assessment of impacts of the proposed site alterations on cultural heritage resources
- Review of development alternatives or mitigation measures where impacts are anticipated
- Recommendations for the preferred mitigation measures





- Legend**
- Study Area
  - Major Road
  - Minor Road
  - Railway
  - Watercourse
  - Waterbody
  - Wooded Area
  - Municipal Boundary, Lower



- Notes**
1. Coordinate System: NAD 1983 UTM Zone 17N
  2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © Queen's Printer for Ontario, 2021.



Project Location: London, ON  
 Prepared by PRM on 2022-06-09  
 Technical Review by FS on 2022-06-09

Client/Project: LEVEL CONTRACTING INC.  
 HERITAGE IMPACT ASSESSMENT  
 254 HILL STREET, LONDON, ONTARIO

Figure No. **1**  
 Title: **Location of Study Area**



- Legend**
- Study Area
  - Waterbody



- Notes**
1. Coordinate System: NAD 1983 UTM Zone 17N
  2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © Queen's Printer for Ontario, 2021.
  3. Orthoimagery © First Base Solutions, 2021, Imagery date 2020.



Project Location: London, ON  
 Prepared by PRM on 2022-06-09  
 Technical Review by FS on 2022-06-09

Client/Project: LEVEL CONTRACTING INC.  
 HERITAGE IMPACT ASSESSMENT  
 254 HILL STREET, LONDON, ONTARIO

Figure No.: **2**  
 Title: **Study Area**

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## 2.0 METHODOLOGY

### 2.1 POLICY FRAMEWORK

#### 2.1.1 Planning Act

The *Planning Act* provides a framework for land use planning in Ontario, integrating matters of provincial interest in municipal and planning decisions. Part I of the *Planning Act* identifies that the Minister, municipal councils, local boards, planning boards, and the Municipal Board shall have regard for provincial interests, including:

*(d) The conservation of features of significant architectural, cultural, historical or scientific interest*

(Government of Ontario 1990)

#### 2.1.2 The 2020 Provincial Policy Statement

The Provincial Policy Statement (PPS) was updated in 2020 and is intended to provide policy direction for land use planning and development regarding matters of provincial interest. Cultural heritage is one of many interests contained within the PPS. Section 2.6.1 of the PPS states that, “significant built heritage resources and cultural heritage landscapes shall be conserved”.

(Government of Ontario 2020)

Under the PPS definition, 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. This may be achieved by the implementation of recommendations set out in a conservation plan, archaeological assessment, and/or heritage impact assessment that has been approved, accepted, or adopted by the relevant planning authority and/or decision maker. Mitigative measures and/or alternative development approaches can be included in these plans and assessments.*

Under the PPS definition, significant means:

*In regard to cultural heritage and archaeology, resources that have been determined to have cultural heritage value or interest. Processes and criteria for determining cultural heritage value or interest are established by the Province under the authority of the Ontario Heritage Act.*

Under the PPS, “protected heritage property” is defined as follows:

*property designated under Parts IV, V or VI of the Ontario Heritage Act; property subject to a heritage conservation easement under Parts II or IV of the Ontario Heritage Act; property*



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*identified by the Province and prescribed public bodies as provincial heritage property under the Standards and Guidelines for Conservation of Provincial Heritage Properties; property protected under federal legislation, and UNESCO World Heritage Sites.*

(Government of Ontario 2020)

Under the PPS, “protected heritage property” is defined as follows:

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(Government of Ontario 2020)

### 2.1.3 City of London Official Plan

The property at 254 Hill Street is listed under the City’s Official Plan, *The London Plan*, contains the following policy regarding development within or adjacent to designated and listed heritage properties:

*586\_ The City shall not permit development and site alteration on adjacent lands to heritage designated properties or properties listed on the Register except where the proposed development and site alteration has been evaluated and it has been demonstrated that the heritage attributes of the heritage designated properties or properties listed on the Register will be conserved.*

The London Plan also contains the following general objectives regarding cultural heritage resources:

- 1. Promote, celebrate, and raise awareness and appreciation of London’s cultural heritage resources.*
- 2. Conserve London’s cultural heritage resources so they can be passed on to our future generations.*
- 3. Ensure that new development and public works are undertaken to enhance and be sensitive to our cultural heritage resources.*

(City of London 2016)

## 2.2 BACKGROUND HISTORY

To understand the historical context of the property, resources such as primary sources, secondary sources, archival resources, digital databases, and land registry records were consulted. Research was also undertaken at the London Public Library Ivy Family London Room. Due to COVID-19 pandemic restrictions, access to some sources was limited or unavailable. To familiarize the study team with the Study Area, historical mapping from 1855, 1888, 1907, 1915, and 1922 was reviewed.



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## 2.3 FIELD PROGRAM

A site assessment was undertaken on June 11, 2021, by Lashia Jones and Frank Smith, both Cultural Heritage Specialists with Stantec. The weather conditions were seasonably warm and clear. The site visit consisted of a pedestrian survey of the property. Interior access was not granted.

## 2.4 EVALUATION OF CULTURAL HERITAGE VALUE OR INTEREST

### 2.4.1 Ontario Regulation 9/06

The criteria for determining CHVI is defined by *Ontario Regulation (O. Reg.) 9/06*. In order to identify CHVI at least one of the following criteria must be met:

1. *The property has design value or physical value because it:*
  - a. *is a rare, unique, representative or early example of a style, type, expression, material or construction method*
  - b. *displays a high degree of craftsmanship or artistic merit*
  - c. *demonstrates a high degree of technical or scientific achievement*
2. *The property has historical value or associative value because it:*
  - a. *has direct associations with a theme, event, belief, person, activity, organization or institution that is significant to a community*
  - b. *yields, or has the potential to yield, information that contributes to an understanding of a community or culture*
  - c. *demonstrates or reflects the work or ideas of an architect, artist, builder, designer or theorist who is significant to a community*
3. *The property has contextual value because it:*
  - a. *is important in defining, maintaining or supporting the character of an area*
  - b. *is physically, functionally, visually or historically linked to its surroundings*
  - c. *is a landmark*

(Government of Ontario 2006a)



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## 2.5 ASSESSMENT OF IMPACTS

The assessment of impacts is based on the impacts defined in the Ministry of Heritage, Sport, Tourism, and Culture Industries (MHSTCI) *Infosheet #5 Heritage Impact Assessments and Conservation Plans* (Infosheet #5). Impacts to heritage resources may be direct or indirect.

Direct impacts include:

- *Destruction of any, or part of any, significant heritage attributes or features*
- *Alteration that is not sympathetic, or is incompatible, with the historic fabric and appearance*

Indirect impacts do not result in the direct destruction or alteration of the feature or its heritage attributes, but may indirectly affect the CHVI of a property by creating:

- *Shadows that alter the appearance of a heritage attribute or change the viability of a natural feature or plantings, such as a garden*
- *Isolation of a heritage attribute from its surrounding environment, context or a significant relationship*
- *Direct or indirect obstruction of significant views or vistas within, from, or of built and natural features*
- *A change in land use such as rezoning a battlefield from open space to residential use, allowing new development or site alteration to fill in the formerly open spaces*
- *Land disturbances such as a change in grade that alters soil, and drainage patterns that adversely affect an archaeological resource*

(Government of Ontario 2006b)

In addition to direct impacts related to destruction, this HIA also evaluated the potential for indirect impacts resulting from the vibrations of construction and the transportation of project components and personnel. This was categorized together with land disturbance. Although the effect of traffic and construction vibrations on historic period structures is not fully understood, vibrations may be perceptible in buildings with a setback of less than 40 metres from the curbside (Crispino and D'Apuzzo 2001; Ellis 1987; Rainer 1982; Wiss 1981). For the purposes of this study, a 50-metre buffer is used to represent a conservative approach to delineate potential effects related to vibration. The proximity of the proposed development to heritage resources was considered in this assessment.

## 2.6 MITIGATION OPTIONS

In addition to providing a framework to assess the impacts of a proposed undertaking, the MHSTCI Infosheet #5 also provide methods to minimize or avoid impacts on cultural heritage resources. These include, but are not limited to:

- *Alternative development approaches*
- *Isolating development and site alteration from significant built and natural features and vistas*
- *Design guidelines that harmonize mass, setback, setting, and materials*
- *Limiting height and density*



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- *Allowing only compatible infill and additions*
- *Reversible alterations*
- *Buffer zones, site plan control, and other planning mechanisms*

(Government of Ontario 2006b)



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## 3.0 HISTORICAL OVERVIEW

### 3.1 INTRODUCTION

The Study Area is located on part of Lot 15, Concession C in the former Township of London, present-day City of London. It is situated on the north side of Hill Street approximately 55 metres west of the intersection of Wellington Street and Hill Street. The Study Area includes the municipal address 254 Hill Street. The legal description of the property is 'PLAN NIL PT LOT 2'. The following sections outline the historical development of the Study Area from the period of colonial settlement to the present-day.

### 3.2 PHYSIOGRAPHY

The Study Area is located in the Caradoc Sand Plain and London Annex physiographic region. This region is largely composed of flat sand plains extending from east London to the Strathroy area in the southwest. In its entirety, the region comprises approximately 482 square kilometres in southwestern Ontario. The land is generally flat with a few rolling hills. The Caradoc Sand Plain and London Annex within and adjacent to the City of London is a basin between 850 and 900 feet above sea level. As the glaciers of the Ice Age retreated, muddy water was discharged into the basin, creating beds of silt and sand. When the water retreated, gravelly alluvium was spread throughout the lower parts of the basin (Chapman and Putnam 1984: 146).

The City of London is located along the Thames River. The well-defined river channel runs through a shallow valley. This is demonstrated through a history of critical flooding in the City as it has developed on land that, in physiographical terms, belongs to the river. This watershed area has proven from its land use history to be rich soil for agriculture development (Chapman and Putnam 1984: 139). London itself developed into the commercial centre for southwestern Ontario because of its position along the river as an early travel route and the high alluvial terrace which offered good building sites (Chapman and Putnam 1984: 146).

### 3.3 TOWNSHIP OF LONDON AND CITY OF LONDON

#### 3.3.1 Survey and Settlement

The present-day City of London is located on the traditional territory of the Attawandaron, Anishinaabeg, Haudenosaunee, and Lunaapeewak Indigenous peoples (City of London 2021). From the 17<sup>th</sup> century to 1763, present-day southwestern Ontario was part of France's sprawling colony of New France. In 1763, following France's defeat in the Seven Years War, it ceded nearly all of its colonial possessions in North America to Spain and Great Britain. Britain's Thirteen Colonies clustered along the Atlantic seaboard eagerly participated in the Seven Years War believing that removing France from the continent would open new lands west of the Appalachian Mountains to settlement. Instead, the British *Proclamation of 1763* closed most of former New France to colonization and transferred the Ohio Valley and present-day southwestern Ontario to the Province of Quebec. This contributed to rising tensions with the Thirteen



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Colonies which culminated with the British recognition of the independence of the Thirteen Colonies as the United States of America in 1783 (Craig 1963: 2).

Approximately one quarter of the population of the Thirteen Colonies were Loyalists to the British Crown and during the American Revolutionary War and following independence, about 50,000 people emigrated from the United States for Great Britain or other colonies, including Canada (Craig 1963: 3). The Loyalist population in Canada wished to live under the customs and common law they were familiar with in the former Thirteen Colonies and Great Britain. To accommodate this, the *Constitutional Act* divided Quebec into Upper Canada in the south and Lower Canada in the north. French laws and customs would be preserved in Lower Canada while British laws and customs would be established in Upper Canada (Taylor 2007: 2). John Graves Simcoe was appointed Lieutenant Governor of Upper Canada and arrived in June 1792 with ambitious plans to mold the colony and its laws into “the very image and transcript of that of Great Britain” (Taylor 2007: 9).

Part of Simcoe's transformative plan for Upper Canada included the forks of the river called La Tranche by the French. Simcoe selected it as the site for the capital of Upper Canada in 1791. He renamed La Tranche to the Thames River and first selected the name Georgina for the capital. By 1792, Simcoe settled on the name London. Prominent merchants of Upper Canada, as well as Guy Carleton, Governor of Canada, objected to the proposed site because of its inaccessibility. The capital never moved to London and was eventually transferred from Newark (present-day Niagara-on-the-Lake) to York (present-day Toronto) (Armstrong 1986: 21; Mombourquette 1992: 5). Simcoe departed Upper Canada in 1796 and the Township of London and site for the capital remained unsettled (Mombourquette 1992: 25).

The first settler in London Township was Joshua Applegarth, who arrived in 1807, and attempted to cultivate hemp before switching to other crops (Page 1878: 5). Despite Simcoe's vision, the entire Township of London remained largely unsettled until after the War of 1812. The first land patent in the township occurred in 1812 when John Hale was granted land. In 1813, several lots were granted to Mahlon Burwell, as part payment to formally survey the township (Page 1878: 9). Burwell had arrived in London Township with Colonel Thomas Talbot in 1810 with plans to develop the township and much of southwestern Ontario. Talbot would eventually be instrumental in the development of 29 townships. Burwell began his survey of London Township just prior to the War of 1812. Before the outbreak of hostilities, he surveyed Concessions 1 through 6. After the war, Burwell resumed his work and completed the remainder of the survey by 1818 (London Township History Book Committee [LTHBC] 2001: 12). London Township was the largest township in Middlesex County. Aside from road allowances, the township contained 96,000 acres of land (Page 1878: 9). The first township meeting was held on January 4, 1819, in Joshua Applegarth's house (Armstrong 1986: 29).

### 3.3.2 19<sup>th</sup> Century Development

Settlement of the Township of London progressed steadily during the first decades of the 19<sup>th</sup> century under the stewardship of Colonel Talbot. In 1818, he recommended his relative, Richard Talbot, settle about 25 new families in London Township. These settlers had come from Ireland. In 1819, the population further increased when Colonel Talbot settled an additional 98 immigrants in London Township (LTHBC 2001: 14).



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In November 1825, the London District courthouse and jail at Vittoria in Norfolk County were damaged by fire. District authorities, including Colonel Talbot, decided to move the district capital to a more central location, instead of rebuilding at Vittoria (Miller 1992: 7). In January 1826, the District Town for the London District was transferred from Vittoria to the Crown Reserve Land in London Township set aside for Simcoe's envisioned capital. In March 1826, Colonel Talbot solicited plans and cost estimates for the erection of a courthouse and jail in London (Brock 2011: 10).

Mahlon Burwell was instructed by Surveyor General Thomas Ridout to survey the town plot of London. Burwell completed his survey of the townsite in June 1826 (Armstrong 1986: 33; Brock 2011: 10; Miller 1992: 7). The borders of this survey were approximately present-day Queens Avenue to the north, the Thames River to the west, South Street to the south, and present-day Wellington Street to the east (Miller 1992: 9). The Study Area was located near the southeast edge of the original town plot 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 (Figure 3).

The first settler in London after the completion of the survey was Peter McGregor, who settled on the present-day southwest corner of King Street and Ridout Street (Brock 2011: 10). The new settlement experienced rapid growth and by 1832 the hamlet contained a courthouse, two churches, three hotels, six general stores, two doctors, two lawyers, and a newspaper. London had a population of about 300 and contained about 130 buildings, most of which were frame construction (Armstrong 1986: 35).

After the Upper Canada Rebellion of 1837, the British military decided to increase its presence in Upper Canada. London was selected as the site of an inland garrison. London was chosen because it was far enough from the American border to not be attacked easily, but also relatively close to Niagara, Windsor, and Lake Huron. The arrival of the army in 1838 resulted in a surge of economic growth and closely linked the community with the wider British Empire (Armstrong 1986: 59-60).

In 1840, the Town of London was incorporated (Brock 2011: 23). When the Town of London was incorporated, the boundaries of the town were extended north to present-day Huron Street and east to present-day Adelaide Street (Armstrong 1986: 67).

As the Town of London continued to develop, residents began to clamor for access to a railway. As early as 1831, merchants and farmers of London and London Township had proposed constructing a railway through the community. In the 1840s, planning began on a line that would run from Niagara to Detroit. The planned route would run through London and many prominent Londoners helped finance the project. The Great Western Railway was chartered in 1845 and construction on the London portion of the line began in October 1847. The ground-breaking ceremony in London was led by Colonel Talbot, who was then 77 years old and still deeply involved in the development of London. In December 1853, the first train pulled into London. (Armstrong 1986: 82-83).



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London benefited greatly from the arrival of the railway, experiencing a boom and developing into a regional centre of industry and finance. Reflecting this growth, the Town of London was reincorporated as a city on January 1, 1855 (Armstrong 1986: 68). Historical mapping prepared in 1855 shows that most development in the City was clustered in the downtown core and north towards the British military garrison. The southwest end of the City contained industrial developments and some residences, mostly clustered along the Thames River and Great Western Railway tracks. The Study Area and all of Hill Street remained undeveloped (Figure 4).

Land value greatly increased in the City, with some property values increasing nearly 300% between 1849 and 1856. This boom was curtailed by the conclusion of the Crimean War in 1857. The end of the war started a depression in the entire British Empire. The impact of the depression was particularly hard on London. By 1860, three quarters of the businesses in the city had failed and the population dropped from 16,000 to 11,000. It would take almost three decades for land values in London to rebound (Armstrong 1986: 86-87). London's economy would begin to recover when the American Civil War (1861-1865) created demand for exports to help feed and supply the Union Army (Armstrong 1986: 99).

The Study Area is located in a neighbourhood of London known as SoHo (South of Horton Street) and was originally known as St. David's Ward, which was Ward One of the City (Eqbal 2020). The early development of SoHo is tied to London's Black community. Before the abolition of slavery in the United States in 1865, London was a destination for enslaved African Americans seeking freedom in Canada. By 1839, about 200 former enslaved Africans and their descendants lived in the City. London was situated far enough from the American border that slave catchers rarely attempted to kidnap fugitive slaves in the City, and therefore offered more safety than border towns such as Windsor or Niagara (Landon 1919: 140). By the late 1850s, the Black population of London reached about 300 (Landon 1919: 141). A portion of the population settled in SoHo and formed a Methodist church at 275 Thames Street, located just north of Horton Street (Miller 1992: 44). The African American residents of SoHo are considered to have constituted "...the foundation for what is now SoHo" (SoHo Community Association 2020). In general, African Canadians readily found work in London and were often able to purchase their own property (Landon 1919: 142-143). African Canadians did experience prejudice and discrimination in London, culminating in an attempt in the early 1860s to segregate London's school system. In 1862, by a vote of 10 to 3 the London School Board voted to create a separate school for Black children "when financially practicable." However, the vote was never acted upon and no segregated school was formed (Landon 1919: 146-147).

The City of London began a period of steady growth after 1861, with the population increasing from 11,200 in 1860 to 19,746 in 1881 (Armstrong 1986: 327; Dominion Bureau of Statistics 1953). It was during this period that development of SoHo began to intensify. The *Bird's Eye View of London* from 1872 shows much of SoHo's street grid was lined with residences, in contrast to the mostly unsettled land depicted in mapping from 1855. The mapping also shows that much of the north side of Hill Street had been developed, including 254 Hill Street (Plate 1). The SoHo neighbourhood was generally a working-class area, and many workers would have been employed at the nearby factories or the railway (Eqbal 2020). In 1875 the London General Hospital opened in SoHo on South Street. The hospital was expanded in subsequent years and was renamed Victoria Hospital in 1899. The hospital was an important component of the SoHo community until its closure in 2013 (London Health Sciences Centre 2021).



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**Plate 1: *Bird's Eye View of London*, showing progression of settlement in the SoHo neighbourhood; the Study Area is denoted by an arrow (Glover 1872)**

During the late 19<sup>th</sup> development also accelerated along the outskirts of the City in the Townships of London and Westminster. The suburbs of London East, London West, and London South were all annexed by the City between 1885 and 1898 (Flanders 1977: 3; Armstrong 1986: 128-129). In 1891, the population of the City of London was recorded as 30,062, a result of growth and annexations (Dominion Bureau of Statistics 1953).

### 3.3.3 20<sup>th</sup> Century Development

In 1912, the City of London had a population of 49,102, which would increase to 69,742 in 1929 (Armstrong 1986: 163). During this period, many modern improvements arrived in the City. Main roads in the central part of the City were paved in asphalt, replacing cedar blocks (Armstrong 1986: 133). The Hydro Electric Power Commission (HEPC), under the leadership of Adam Beck, commenced to service London with hydroelectricity from Niagara in 1910 (Armstrong 1986: 136). The Public Utilities Commission was established in 1914 to manage the distribution of electricity, water, and city parks (Armstrong 1986: 168).



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Within SoHo, a Jewish community began to develop. In 1927, the Hebrew School-Talmud Torah was built for London's Jewish community, many of which lived in SoHo. The Jewish community of London traces its origins to the Pogroms of the late 19<sup>th</sup> century, which led to many Jewish people fleeing eastern Europe for the United States and Canada. The building was used by the Jewish community of London into the mid-20<sup>th</sup> century (Eqbal 2020; Gladstone 2011).

Compared to other municipalities in Ontario, London fared relatively well during the Great Depression. Several major building projects were completed in London during the 1930s, including the underpass of Richmond Street under the CNR tracks and construction of the Dominion Public Building on Richmond Street. In 1932, only 8% of the population was unemployed, a much lower number than other cities in southern Ontario such as Toronto, Hamilton, and Windsor (Armstrong 1986: 185). Nonetheless, the effects of the Great Depression and Second World War curtailed growth in the City (Curtis 1992: 15).

After the war, the growth of London accelerated and large swaths of land in surrounding townships were suburbanized. In response, the City of London annexed large portions of London and Westminster Townships in 1961 (Meligrana 2000: 8). The population of the City of London was recorded as 169,569 in 1961, an increase of 78% since 1951 (Dominion Bureau of Statistics 1953; Dominion Bureau of Statistics 1962).

Infrastructure improvements carried out in the City during the 1960s included new railway overpasses at Adelaide Street, Highbury Avenue, and Quebec Street. In the 1970s, Queens Avenue and Dundas Street were extended over the Thames River and Wonderland and Hutton roads were connected via the new Guy Lombardo Bridge (Armstrong 1986: 213-214). As the population of London shifted to the suburbs during the mid-20<sup>th</sup> century it was becoming increasingly unnecessary to visit downtown London (Armstrong 1986: 234). By the 1970s, a revitalization plan was needed for the City's downtown. A cohesive vision for the city core did not develop and a mix of infill and new construction occurred during the 1970s, including the City Centre Complex, the London Centre Arcade, the new City Hall, and new federal building and courthouse (Armstrong 1986: 234, 238).

During the 1980s, the pace of growth in the City steadied. The population of the City in 1980 was 261,841 (Armstrong 1986: 327) and most new growth in London occurred at the south and north ends of the city as subdivision development accelerated (Miller 1992: 229). The City of London is continuing to grow and develop in the 21<sup>st</sup> century. In 2016, the City of London had a population of 383,822, an increase of 4.8% since 2011 (Statistics Canada 2019). SoHo has retained its character as a distinct neighbourhood within the City of London into the present-day and retains many late 19<sup>th</sup> to early 20<sup>th</sup> century buildings and newer infill, including the proposed redevelopment of the Victoria Hospital South Street campus (SoHo Community Association 2021).

### 3.4 PROPERTY HISTORY

As noted in Section 3.3.1, the Study Area is located within the bounds of the original town plot of London. Early development in London was clustered around the courthouse and gradually expanded (Tausky and DiStefano 1986: 12-13). Based on historical mapping and historical research, the community of SoHo began to undergo significant development in the 1860s, driven by the economic and population growth of London in the 1860s. The residence at 254 Hill Street was likely built sometime between the start of the



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American Civil War in 1861 and when it appears on the *Bird's Eye View of London* in 1872. A date of construction prior to 1861 is unlikely as the structure does not appear in mapping from 1855 and London was in an economic depression during the 1850s, resulting in a population decrease in London between 1850 and 1860 (Figure 4).

The first available City Directory to include a street listing was published in 1872 and listed Job Cousins as the occupant of the Study Area. While this directory does not include address numbers, the directory listed Job Cousins as residing at the second structure on the north side west of the intersection of Wellington Street and Hill Street, which is the location of 254 Hill Street (Cherrier and Kirwin 1872: 31). Job Cousins was a pump maker and foreman who worked with his brother James M. Cousins and nephew John Cousins (Hunter and Cullery 1856: 34; Cherrier and Kirwin 1872: 70). James M. Cousins arrived in London in the 1840s from Truro, Nova Scotia. He was the owner and founder of the pump manufacturing business that employed the Cousins family. James served as the mayor of London for one year in 1871 and was known for his role in establishing the Western Fair (Armstrong 1986: 326; London Free Press 1899). It is likely that Job followed James to London around the same time, as Job Cousins is listed in a City Directory as early as 1856 (Hunter and Cullery 1856: 34).

Job Cousins began to reside at 254 Hill Street after 1866 as the City Directory for 1866 to 1867 lists Job Cousins as residing on Wellington Street and the City Directory for 1864 to 1864 lists Job Cousins as residing on Simcoe Street between Talbot Street and Richmond Street (Murphy 1863 :23; Sutherland and Co. 1866: 42). Therefore, if the residence at 254 Hill Street was built for Job Cousins, this likely took place between 1868 and 1871. Job Cousins is not listed in the Census of 1871 but is listed in the Census of 1881. He was listed as a 56-year-old pump maker born in Nova Scotia. He lived with his wife Esther, age 48; son Walter, age 24; daughter Nettie, age 19; son John, age 18; daughter Alice, age 14; and son Frank, age 12 (Library and Archives Canada 1881).

Fire Insurance Mapping from 1888 depicts the Study Area as containing the only brick structure on Hill Street between Wellington Street and Clarence Street. The residence is depicted as having two brick sections comprising a compound shape which matches the present-day configuration of the residence. A frame addition was attached to the north elevation of the brick structure (Figure 5). The final year that Job Cousins is listed as the occupant of 254 Hill Street was 1892 (Might Directories 1892: 55). According to the obituary of James Cousins, Job relocated to Westminster Township (London Free Press 1899). Job Cousins died in December 1904 and is buried at Woodland Cemetery in London (Find-A-Grave 2021).

The residence at 254 Hill Street was briefly occupied by Randall Mark in 1893. Beginning In 1895, John Wheatcroft was listed as the occupant of 254 Hill Street. John Wheatcroft was employed as a baggageman with the Grand Trunk Railway (Might Directories 1895: 338). The Census of 1901 listed him as a 52-year-old born in England employed in the baggage profession. He lived with his wife Mary, age 51; son Albert, age 23; son Frederick, age 21; daughter Lilley, age 19; son Arthur, age 17; son Harry, age 15; daughter Maud, age 14; son George, age 12; and son Clifford, age 8 (Library and Archives Canada 1901). John and Mary Wheatcroft were members of the Brotherhood of Railroad Trainmen, a labor organization for rail employees. The London, Ontario based Victoria Lodge of the Ladies' Auxiliary of the Brotherhood was led by Mary Wheatcroft during 1900 (Railroad Trainmen's Journal 1900). Between 1911 and 1915, John Wheatcroft and his family moved from 254 Hill Street (Vernon Directories 1909; Vernon Directories 1915).



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By 1921, the residence at 254 Hill Street was occupied by John Gardner. He was the owner of the Union Taxi Service based at 651 Richmond Street (Vernon Directories 1922: 315, 566; Library and Archives Canada 1921). The Census of 1921 lists John Gardner as a 54-year-old taxi driver born in England. He lived with his wife Caroline, age 48; son Paul, whose age is illegible; daughter Helen, age 29; and daughter Lillian, age 23 (Library and Archives Canada 1921). Fire insurance mapping from 1922 shows that the residence at 254 Hill Street remained a compound structure with a frame rear addition (Figure 6). Lillian Gardner would remain at 254 Hill Street into the mid-20<sup>th</sup> century, residing there in 1955 with a Mrs. M. Corrin (Vernon Directories 1955: 634). According to land registry records, the Gardner family was no longer associated with 254 Hill Street by 1967 (ONLand 2021). Based on a review of Google Streetview, the property was vacated and boarded sometime between 2015 and 2019.



Legend  
 Study Area

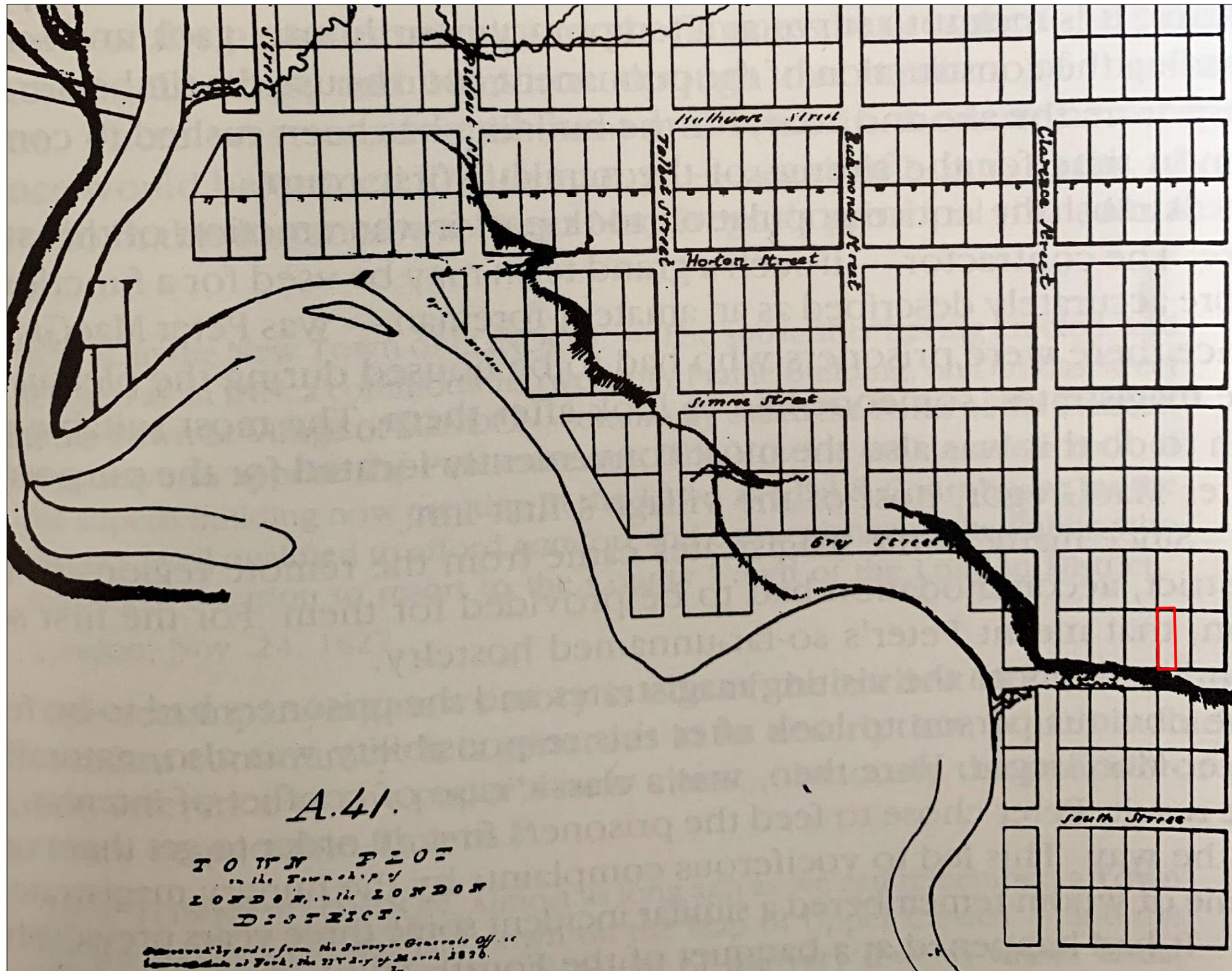


Figure Not to Scale

**Notes**  
 1. Burwell, Mahlon. 1826. Town Plot in the Township of London in the London District.



Project Location: London, ON  
 Client/Project: LEVEL CONTRACTING INC. HERITAGE IMPACT ASSESSMENT 254 HILL STREET, LONDON, ONTARIO  
 Figure No.: 3  
 Title: London Town Plot, 1826

160940768 REVA  
 Prepared by PRM on 2022-06-09  
 Technical Review by FS on 2022-06-09

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Figure No.  
**3**  
 Title  
**London Town Plot, 1826**



Legend  
 Study Area

Figure Not to Scale

Notes  
 1. Peters, Samuel. 1855. Map of the City of London, Canada West.



Project Location: London, ON  
 160940768 REVA  
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Figure No.  
**4**

Title  
**Map of the City of London, 1855**

Legend  
 Study Area

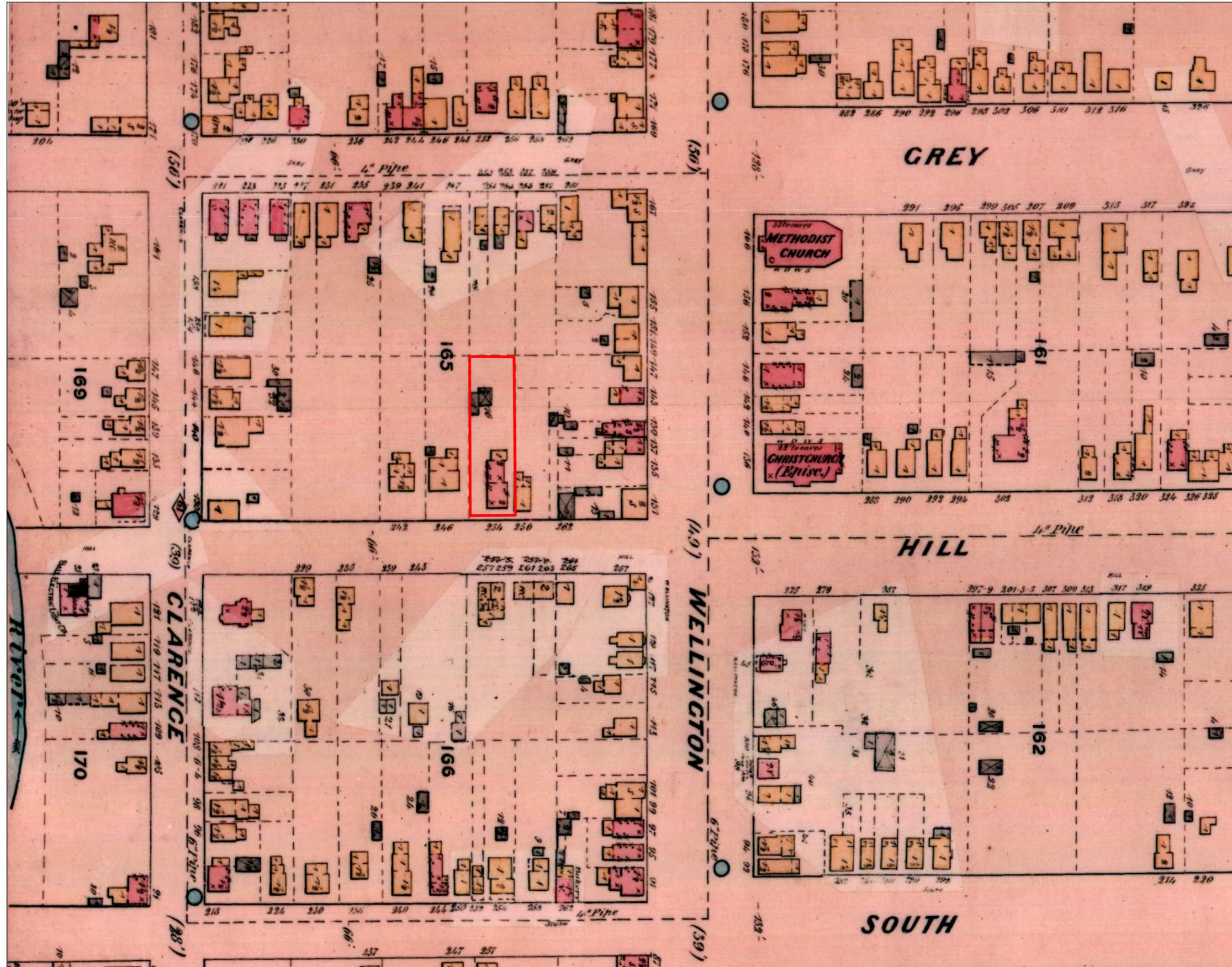


Figure Not to Scale

**Notes**  
 1. Goad, Charles, 1888. Insurance Plan of London Ontario, Sheet 28. Montreal: Charles E. Goad.



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 160940768 REVA  
 Prepared by PRM on 2022-06-09  
 Technical Review by FS on 2022-06-09

Client/Project:  
 LEVEL CONTRACTING INC.  
 HERITAGE IMPACT ASSESSMENT  
 254 HILL STREET, LONDON, ONTARIO

Figure No.:  
**5**  
 Title:  
**Fire Insurance Plan, 1888**

Legend  
 Study Area



Figure Not to Scale

Notes  
 1. Underwriters Survey Bureau, 1922, Key Plan of the City of London, Ontario, Sheet 28, Toronto: Underwriters Survey Bureau Limited.



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Figure No.

6

Title

Fire Insurance Plan, 1922

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## 4.0 SITE DESCRIPTION

### 4.1 INTRODUCTION

As outlined in Section 2.3, a site visit was undertaken on June 11, 2021 by Frank Smith and Lashia Jones, both Cultural Heritage Specialists with Stantec. Weather conditions were sunny and seasonably warm. The site visit consisted of a pedestrian survey of the property.

### 4.2 LANDSCAPE SETTING

The property is located on the north side of Hill Street, approximately 55 metres west of the intersection of Wellington Street and Hill Street. Hill Street is a two-lane asphalt paved road between Clarence Street and Wellington Street. Both sides of the street contain concrete sidewalks with no grass medians. Wooden utility poles line the south side of the street and contain municipal streetlighting. The north side of Hill Street gently slopes upward towards the north and contains mid-19<sup>th</sup> to early 20<sup>th</sup> century residences, a vacant lot at 242 Hill Street, and modern infill at 256 Hill Street. The south side of Hill Street contains mid-19<sup>th</sup> to early 20<sup>th</sup> century residences and a large vacant lot at 243-261 Hill Street. The residences along this section of Hill Street are detached structures set on lots with lawns and mature trees, resulting in a suburban character for the area (Plate 2 and Plate 3).

The property at 254 Hill Street is landscaped with a lawn, concrete steps to the residence, partially overgrown concrete driveway, a backyard which is in the process of naturalizing, and a small outbuilding. The front lawn gently slopes north, and the residence is located at the highest point of the property. A set of concrete steps connects Hill Street with the residence (Plate 4). Located west of the residence is a concrete driveway which has been partially overgrown and is exhibiting cracking (Plate 5). Aside from a Black Walnut tree which straddles the property line between 254 and 248 Hill Street, the front yard contains no ornamental plants, shrubs, or trees aside from the lawn. While no ornamental trees or shrubs were present, young, naturally occurring, vegetation borders the residence and the lot line (Plate 6). The backyard is divided from the front yard by a wooden fence (Plate 7). The backyard contains a lawn which has reverted to meadow and vegetation in the early stages of ecological succession. The north border of the property is delineated by an overgrown wooden fence. The east border of the backyard is delineated by a wooden fence and chain link fence. Dense vegetation obscured the western border in the backyard (Plate 8). A small outbuilding is located just northwest of the residence. The outbuilding has a shed roof and is clad in asphalt shingles. The outbuilding has an entrance on the south elevation and a window opening on the east elevation (Plate 9).



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**Plate 2: Looking east on Hill Street**



**Plate 3: Looking west on Hill Street**



**Plate 4: Concrete steps and front lawn, looking north**



**Plate 5: Concrete driveway, looking north**



**Plate 6: Looking northeast at Black Walnut tree (left) and vegetation along house**



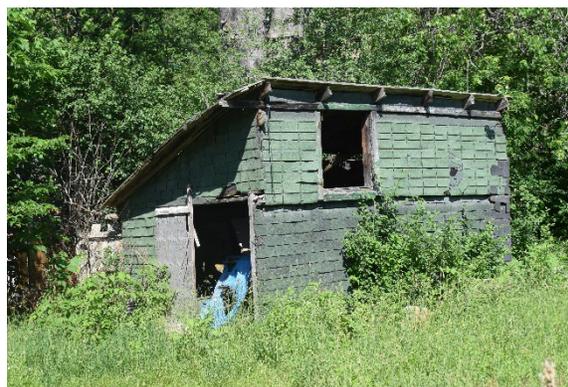
**Plate 7: Wooden fence, looking north**



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**Plate 8: Naturalizing back yard, looking north**



**Plate 9: Outbuilding, looking northwest**

### 4.3 RESIDENCE

The residence at 254 Hill Street is a two-storey structure with a compound plan. The principal mass contains a low-pitched hip roof with overhanging eaves and a brick chimney. The rear (north) projection contains a medium pitched gable roof. The exterior of the residence is buff brick with a Flemish bond pattern (Plate 10). Portions of the foundation of the residence is buff brick and other portions are not visible.

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 (Plate 11). The second storey contains three two-over-two (2/2) windows in segmental arch window openings, with wood frames, wood sills, and buff brick voussoirs (Plate 12). The first storey contains two boarded windows with segmental arch window openings, wood sills, and brick voussoirs (Plate 13). The main entrance contains a transom, sidelights, and a boarded door (Plate 14). The door is accessed via a porch. The porch is supported by concrete blocks and classically inspired wood columns and the brick exterior of the porch area has been painted (Plate 15).

The west elevation is divided into two sections. The southernmost section is part of the principal mass while the northern section is part of the gable roof projection (Plate 16). The principal section on the second storey contains a 2/2 window in a segmental arch opening with wood frames, wood sills, and a brick voussoir. This window also contains a modern storm window. The first storey contains a boarded window with a segmental arch opening, wood sills, and brick voussoir (Plate 17). The brick chimney projects outward on the west elevation south of the windows. The west elevation of the gable roof projection contains on the second storey two 2/2 windows in a segmental arch opening with wood frames, wood sills, and a brick voussoir. These windows also contain modern storm windows. The first storey contains a boarded window with a segmental arch opening, brick voussoir, and wood sill (Plate 18).

The north elevation is primarily comprised of the gable roof projection and only a small section of the principal mass is visible on the north elevation. The gable roof projection contains a narrow and boarded window opening with a segmental arch opening, brick voussoir, and wood sill on the first storey. The location of the former frame addition depicted in fire insurance mapping is evidenced by a section of brick



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which does not match the colour of the rest of the residence (Plate 19). The north elevation of the principal mass contains on the second storey a 6/6 window in a segmental arch opening with wood frames, wood sills, and a brick voussoir (Plate 20). The window has a modern storm window. The first storey contains a boarded window opening with a segmental arch opening, brick voussoir, and wood sill (Plate 21).

The east elevation is divided into two sections. The southernmost section is part of the principal mass while the northern section is part of the gable roof projection (Plate 22). The principal mass contained on the second storey an arched window opening with a 2/2 window with a wood frame, wood sill, and brick voussoir (Plate 23). The window has a modern storm window. The gable projection contains a shed roof addition clad in modern siding with a modern window. The second storey contains two 2/2 windows with segmental arch window openings, wood frames, wood sills, and brick voussoirs (Plate 24). The first storey contains a boarded window with a segmental arch opening, brick voussoir, and wood sill. Between the window and shed roof addition is a bricked over former entrance with a brick voussoir (Plate 25)

A Structural Condition Evaluation of 254 Hill Street was undertaken by DC Buck Engineering in February 2022. 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. A copy of the Structural Condition Evaluation is included in Appendix B.



**Plate 10: Brick bond, looking east**



**Plate 11: South (main) elevation, looking north**



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Plate 12: Second storey windows of south elevation, looking north



Plate 13: Boarded windows, looking north elevation



Plate 14: Main entrance, looking north



Plate 15: Close-up of concrete block and wood columns of porch



Plate 16: Looking southeast at the two sections of the west elevation



Plate 17: Windows of the principal section of the west elevation



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**Plate 18: Windows of the gable roof projection, looking east**



**Plate 19: North elevation of gable projection, looking south**



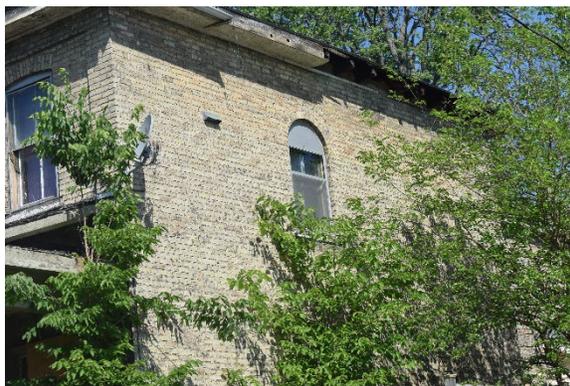
**Plate 20: Second storey window of north elevation of principal mass, looking south**



**Plate 21: First storey window of north elevation of principal mass, looking south**



**Plate 22: Looking west at east elevation**



**Plate 23: Arched window of east elevation, looking northwest**



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**Plate 24: Looking south showing second storey windows and shed roof addition of east elevation**



**Plate 25: Boarded window and bricked over doorway, looking west**

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## 5.0 COMPARATIVE ANALYSIS

The residence is identified on the City's *Inventory of Cultural Heritage Resources* (The Register) as being of the Italianate architectural style; it is one of 348 Italianate structures on the Register. This includes various types of buildings such as commercial, single detached residential, semi-detached or rowhouse, and farmhouses. Unlike the Gothic Revival architectural style with the sub-set of the Gothic Cottage or L-shaped farmhouse, the Italianate style does not have clear distinctions between residential building types that would have been found in rural as compared to urban areas. The residence at 254 Hill Street shares similarities with 31 Askin Street, 220 Burwell Street, 99 Byron Avenue, 268 Clarence Street, 482 Colborne Street, 20 Prospect Avenue, and 789 Queens Avenue.

Overall, the Italianate style is common in London and accounts for 5.8% of listed and designated heritage resources. The residence at 254 Hill Street is a relatively vernacular interpretation of the style. The City of London contains better examples of Italianate residences that contain additional architectural features not found at 254 Hill Street, including paired brackets, decorative cornices, window surrounds, and carved wooden trim that are common to the style.



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## **6.0 EVALUATION OF CULTURAL HERITAGE VALUE OR INTEREST**

### **6.1 INTRODUCTION**

The criteria for determining CHVI is defined by O. Reg. 9/06 (see Section 2.4.1). If a property meets one or more of the criteria it is determined to contain, or represent, a cultural heritage resource. A summary statement of cultural heritage value will be prepared, and a list of heritage attributes which define the CHVI identified. Given the identification of a cultural heritage resource, consideration should be given to the effects of a proposed change on the heritage attributes of that property. The evaluation of 254 Hill Street according to O. Reg. 9/06 is provided below.

### **6.2 DESIGN OR PHYSICAL VALUE**

The property at 254 Hill Street contains a representative example of a vernacular Italianate style residence, as demonstrated through rectangular plan, brick construction, segmental and round arched windows with 2/2 sash double hung wood frame windows, brick voussoirs, cast stone sills, low-pitched hip roof, and single entrance door with sidelights and transom. The dwelling does not contain decorative elements such as paired brackets, decorative cornices, window surrounds or carved wooden trim that were common to the style. The style and type of dwelling is a portrayal of a residential dwelling suited to London's emerging middle class in the 19<sup>th</sup> century.

### **6.3 HISTORIC OR ASSOCIATIVE VALUE**

The property is associated with Job Cousins, a local pump maker who came to London from Truro, Nova Scotia, in the mid-19<sup>th</sup> century. He worked with his brother James Cousins, who owned the pump making business. While James Cousins appears to have played a role in the development of the community by serving as Mayor in 1871 and establishing the Western Fair, there is no direct historical evidence to suggest that Job Cousins or his immediate family members residing at Hill Street played a significant role in this. As such, there are no indications that the family played a significant contribution to the evolution or pattern of settlement or development in the community, as per the MHSTCI application of this criteria. The property does not yield information that contributes to the understanding of a community or culture. Architect, builder, or designers for the property are not known and therefore the property does not meet this criterion.

### **6.4 CONTEXTUAL VALUE**

The property at 254 Hill Street does not demonstrate contextual value. The setting around the property contains a mix of residential building types from the mid-to-late 19<sup>th</sup> century and early 20<sup>th</sup> century but does not demonstrate a defined or consistent character. The property does not demonstrate a strong material connection to its surroundings, as it is not part of a landscape or area that is strictly defined by the relationship between resources and physical features of an area. The property is not necessary to



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fulfill a particular purpose in its surroundings (e.g., a barn on a farmstead, or a mill at an industrial site) and does not demonstrate a strong visual connection to elements in its surroundings. There is no significant historical connection between the property and its surroundings.

## 6.5 SUMMARY OF EVALUATION

Table 1 provides a summary of the findings of CHVI based on an evaluation according to O. Reg. 9/06.

**Table 1 Evaluation of 254 Hill Street According to Ontario Regulation 9/06**

Criteria of O. Reg. 9/06	Yes/No	Comments
<b>Design or Physical Value</b>		
Is a rare, unique, representative, or early example of a style, type, expression, material, or construction method	Yes	The residence on the property at 254 Hill Street is representative of the vernacular Italianate architectural style. This is demonstrated in its rectangular plan, low pitched hip roof, and segmental and round arched windows. Decorative elements common to the Italianate style, such as paired brackets at the eaves, decorative cornices, window surrounds or carved trim are not present.
Displays a high degree of craftsmanship or artistic merit	No	The residence does not demonstrate a high degree of craftsmanship or artistic merit. It uses materials and construction methods that are typical for the time period and building type and does not contain highly decorative elements that display craftsmanship or artistic merit.
Demonstrates a high degree of technical or scientific achievement	No	The residence does not demonstrate a high degree of technical or scientific achievement. It uses technology and methods that were typical for the time period and the building type.
<b>Historical or Associative Value</b>		
Has direct associations with a theme, event, belief, person, activity, organization, or institution that is significant to a community	No	The property does not have direct historical associations with a theme, event, belief, person, activity, or institution that is significant to a community. Extended family members of one property owner, Job Cousins, played a significant role in the development of the Western Fair, but there is no evidence to suggest that the residents of 254 Hill Street played a significant part.
Yields, or has the potential to yield, information that contributes to an understanding of a community or culture	No	The property does not yield information that contributes to an understanding of a community or culture.
Demonstrates or reflects the work or ideas of an architect, artist, builder, designer, or theorist who is significant to a community	No	The architect, builder, or designer of the house is not known, and therefore the criteria is not satisfied.
<b>Contextual Value</b>		



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Criteria of O. Reg. 9/06	Yes/No	Comments
Is important in defining, maintaining, or supporting the character of an area	No	The property is not important in defining, maintaining, or supporting the character of an area. While many of the properties on Hill Street appear to date to the later 19 <sup>th</sup> to early 20 <sup>th</sup> century, there are of various styles and do not demonstrate a strong or discernable character.
Is physically, functionally, visually, or historically linked to its surroundings	No	The property is no longer physically, visually, or historically linked to its surroundings. The property does not demonstrate a strong material connection to its surroundings, is not necessary to fulfill a particular purpose in its surroundings and does not demonstrate a strong visual connection to elements in its surroundings. There is no significant historical connection between the property and its surroundings.
Is a landmark	No	The property is not considered to be a landmark. It is one of several properties on Hill Street that were constructed in the later 19 <sup>th</sup> to early 20 <sup>th</sup> century.

## 6.6 STATEMENT OF CULTURAL HERITAGE VALUE

### 6.6.1 Description of Property

The property at 254 Hill Street is located on the north side of Hill Street, east of Wellington Street on a 0.2-acre lot. The property contains a late 19<sup>th</sup> century two-storey vernacular Italianate style dwelling constructed with buff brick, and with a low-pitched hip roof.

### 6.6.2 Cultural Heritage Value

The property at 254 Hill Street demonstrates design/physical value as a representative late 19<sup>th</sup> century Italianate style residence. The house is a modest representative example of the vernacular Italianate style of architecture, evident in its two-storey height, rectangular plan, brick construction, segmental and round arched windows with two-over-two sash double hung wood frame windows, brick voussoirs, wood sills, low-pitched hip roof, and single entrance door with sidelights and transom. The style and type of dwelling is a portrayal of a residential dwelling suited to London’s emerging middle class in the 19<sup>th</sup> century.

### 6.6.3 Heritage Attributes

Heritage attributes representative of the Italianate style residence include:

- Two storey, rectangular plan
- Low pitched hip roof
- Buff brick common bond construction with brick pilasters at the front elevation corners and plain brick frieze
- Segmental arch and round arch windows with brick voussoirs, wood sills, and two-over-two sash wood frame double hung windows



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- Single entrance with sidelights and transom

## 7.0 IMPACT ASSESSMENT

### 7.1 DESCRIPTION OF PROPOSED UNDERTAKING

Level Contacting is proposing to construct on the property a three-storey apartment building with a total of 23 units and a footprint of 4,928 square feet (457.9 square metres). The proponent is proposing to demolish the existing residence to allow for construction of the new apartment building and required site parking. The new structure will be located in the west section of the property. Conceptual landscaping modifications to the property include a parking area along the east and north edge of the property. The current concept plan for the site is included in Appendix A.

### 7.2 ASSESSMENT OF IMPACTS

The residence at 254 Hill Street has CHVI since it meets one criterion for determining cultural heritage value included in *O. Reg 9/06*. Accordingly, the assessment of potential impacts is limited to the heritage attributes of 254 Hill Street as outlined in Section 6.6.3. Impacts are defined by Info Sheet #5, as discussed in Section 2.5. Table 2 and Table 3 contain a discussion of impacts as defined in Info Sheet #5.

**Table 2 Evaluation of Potential Direct Impacts**

Direct Impact	Impact Anticipated	Relevance to 254 Hill Street
<b>Destruction</b> of any, or part of any, <i>significant heritage attributes</i> or features.	Yes	The proposed undertaking would result in demolition of the resource and its heritage attributes. <b>Therefore, mitigation measures are required.</b>
<b>Alteration</b> that is not sympathetic, or is incompatible, with the historic fabric and appearance.	Not Applicable (N/A)	The proposed undertaking would result in demolition of the resource. <b>Therefore, this impact is not applicable.</b>



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**Table 3 Evaluation of Potential Indirect Impacts**

Indirect Impact	Impact Anticipated	Relevance to 12035 Dixie Road
<b>Shadows</b> created that alter the appearance of a <i>heritage attribute</i> or change the viability of a natural feature or plantings, such as a garden	N/A	The proposed undertaking would result in demolition of the resource. <b>Therefore, this impact is not applicable.</b>
<b>Isolation</b> of a <i>heritage attribute</i> from its surrounding environment, context, or a <i>significant</i> relationship	N/A	The proposed undertaking would result in demolition of the resource. <b>Therefore, this impact is not applicable.</b>
<b>Direct or indirect obstruction</b> of <i>significant</i> views or vistas within, from, or of built and natural features	N/A	The proposed undertaking would result in demolition of the resource. <b>Therefore, this impact is not applicable.</b>
<b>A change in land use</b> such as rezoning a battlefield from open space to residential use, allowing new <i>development</i> or <i>site alteration</i> to fill in the formerly open spaces	N/A	The proposed undertaking would result in demolition of the resource. <b>Therefore, this impact is not applicable.</b>
<b>Land disturbances</b> such as a change in grade that alters soil, and drainage patterns that adversely affect an <i>archaeological resource</i>	N/A	The proposed undertaking would result in demolition of the resource. <b>Therefore, this impact is not applicable.</b>

### 7.3 DISCUSSION OF IMPACTS

The proposed undertaking would result in direct impacts to the property at 254 Hill Street as it would result in the demolition of the structure and all heritage attributes of the residence. This is an irreversible impact, and no additional direct or indirect impacts are applicable.



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## 8.0 MITIGATION

The property at 254 Hill Street was determined to have CHVI as it meets one criterion of *O. Reg. 9/06*. Specifically, the CHVI of the property is related to its design value as containing a representative example of a vernacular Italianate style residence. As identified in Table 2 and Table 3, the proposed undertaking has potential to result in a direct impact to the residence as demolition of the residence is proposed due to the poor condition of the residence and parking requirements for the new development. Accordingly, the mitigation options identified in Info Sheet #5 Mitigation Options (see Section 2.6) have been explored below.

### 8.1 INFO SHEET #5 MITIGATION OPTIONS

Consideration for each option is given both for the appropriateness of the mitigation in the context of the CHVI identified and the feasibility of the mitigation option. Also considered is an understanding of the surrounding context within which the property is located.

**Alternative development approaches:** Alternative development approaches were considered to incorporate the existing residence into the development plans and divide it into multiple apartment units. However, the poor condition of the existing resource and parking requirements makes this mitigation measure unfeasible. A Structural Condition Evaluation is contained in Appendix B. The evaluation concluded the existing structure at 254 Hill Street poses a safety hazard and should be removed.

**Isolating development and site alteration from significant built and natural features and vistas:** Isolating development was considered to incorporate the existing residence into the development plans and divide it into multiple apartment units. However, the poor condition of the existing resource makes this mitigation measure unfeasible. Given the condition of the residence, site topography, and parking requirements, the relocation of the residence within the existing site to isolate development is not feasible.

**Design guidelines that harmonize mass, setback, setting, and materials:** Design guidelines can be implemented that incorporate salvaged materials (if their condition is acceptable) which reflects the architectural style of the existing dwelling. This may include the use of buff brick, segmental and round arch window openings with voussoirs, two-over-two sash windows, a hipped roof, and plain brick friezes.

**Limiting height and density:** If the existing residence were to be demolished, limiting height and density would not be an applicable mitigation measure, as the heritage attributes of the property are limited to the existing structure.

**Allowing only compatible infill:** If the existing residence were to be demolished, allowing only compatible infill would not be an applicable mitigation measure, as the heritage attributes of the property are limited to the existing structure.

**Reversible alterations:** If the existing residence were to be removed, reversible alterations would not be an appropriate mitigation measure, as the heritage attributes of the property are limited to the existing structure.



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**Buffer zones, site plan control, and other planning mechanisms:** Should demolition of the existing residence be pursued, site plan controls should be implemented to incorporate salvaged materials or design elements of the existing building into the proposed development.

### 8.2 RETENTION

Generally, retention *in situ* is the preferred option when addressing any structure where CHVI has been identified, even if limited. The benefits of retaining a structure must be balanced with site specific considerations. Not only must the level of CHVI be considered, so too must the structural condition of the heritage resource, the site development plan, and the context within which the structure would be retained and development occur around the structure.

Retention *in situ* with the proposal to redevelop frontage on Hill Street is challenged by site constraints and the poor condition of the resource. A Structural Condition Evaluation concluded the existing structure at 254 Hill Street poses a safety hazard and should be removed. Therefore, in the context of the proposed development, retention is not a feasible alternative.

In addition, 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. Therefore, based on the poor condition of the structure, site constraints, and the presence of better examples of Italianate structures within the City, retention *in situ* is not considered the preferred mitigation option for 254 Hill Street.

### 8.3 RELOCATION

Where retention *in situ* is not feasible or preferred, relocation is often the next option considered to mitigate the loss of a heritage resource. As with retention, relocation of a structure must be balanced with the CHVI identified. Relocation removes the resource from its contextual setting but allows for the preservation of noteworthy heritage attributes. Relocation, therefore, should be considered only if the community wishes to preserve the structure for its design/physical value. The relocation of 254 Hill Street is likely not possible due to the poor condition of the resource. A Structural Condition Evaluation concluded the existing structure at 254 Hill Street poses a safety hazard and should be removed. Therefore, the structure is unlikely to withstand the relocation process. Based on the above discussion, relocation is not considered a viable mitigation option at 254 Hill Street.

### 8.4 DOCUMENTATION AND SALVAGE

Detailed documentation and salvage are often the preferred mitigation strategy where retention or relocation is not feasible or warranted. Documentation creates a public record of the structure which provides researchers and the general public with a land use history, construction details, and photographic record of the resource. Through the selective salvage of identified heritage attributes and other materials, the CHVI of the property can be retained, albeit in a different context. Documentation and



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salvage of heritage attributes in their current context and where feasible, allows for reuse. Documentation should be undertaken prior to any changes made to the property.

For 254 Hill Street, 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.

Although documentation and salvage would not lessen the impact of demolition, it would seek to record the CHVI identified, making the building available for future study. Documentation activities should be carried out through photography, mapping, photogrammetry, and/or LiDAR scan. Documentation should be carried out in advance of any changes made to the property.

Materials salvaged from the structure should be retained and incorporated into on-site features, such as entrance gates, landscape walls, garden beds, site furniture, or incorporation into the new development. Salvaged items should include:

- Buff brick
- Segmental arch and round arch windows with brick voussoirs, wood sills, and two-over-two sash wood frame double hung windows



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## 9.0 RECOMMENDATIONS

An assessment of impacts resulting from the proposed undertaking at 254 Hill Street has determined that the proposed undertaking would result in direct impacts to the property through demolition. Based on the adverse impacts identified to this cultural heritage resource, the retention of the residence *in situ* is the preferred alternative method from a heritage perspective since the CHVI of the property would be retained in its entirety. However, retention of the residence is not feasible due to site plan requirements and the poor condition of the residence. A Structural Condition Evaluation concluded the existing structure at 254 Hill Street poses a safety hazard and should be removed. Where retention *in situ* is not feasible or preferred, relocation is often the next option considered to mitigate the loss of a heritage resource. However, the residence is in poor condition and is unlikely to withstand the relocation process. Therefore, relocation is not a viable mitigation measure.

Detailed documentation and salvage are often the preferred mitigation strategy where retention or relocation is not feasible or warranted. For 254 Hill Street, 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.

Documentation activities should be carried out through a full recording of the residence through photography, mapping, photogrammetry, and/or LiDAR scan. Documentation should be carried out in advance of any changes made to the property. Salvage activities should consist of the identification and recovery of re-useable materials by a reputable salvage company or charity, with materials retained to be repurposed on site through landscape and built features. Salvaged materials should include:

- Buff brick
- Segmental arch and round arch windows with brick voussoirs, wood sills, and two-over-two sash wood frame double hung windows

The documentation and salvage work should be carried out under the direction of a Cultural Heritage Specialist in good professional standing with the Canadian Association of Heritage Professionals (CAHP).

## 9.1 DEPOSIT COPIES

To assist in the retention of historic information, copies of this report should be deposited with local repositories of historic material as well as with municipal and regional planning staff. Therefore, it is recommended that this report be deposited at the following location:

**London Public Library**  
251 Dundas Street  
London, ON N6A 6H9



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## **10.0 CLOSURE**

This report has been prepared for the sole benefit of Level Contracting Inc. and may not be used by any third party without the express written consent of Stantec Consulting Ltd. Any use which a third party makes of this report is the responsibility of such third party.

We trust this report meets your current requirements. Please do not hesitate to contact us should you require further information or have additional questions about any facet of this report.

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## 11.0 REFERENCES

- Armstrong, Frederick H. 1986. *The Forest City: An Illustrated History of London, Canada*. Windsor: Windsor Publications.
- Brock, Daniel J. 2011. *Fragments From The Forks: London Ontario's History*. London: London & Middlesex Historical Society.
- Chapman, L.J. and D.F. Putnam. 1984. *The Physiography of Southern Ontario*. Third edition. Toronto: Ontario Ministry of Natural Resources.
- Cherrier and Kirwin. 1872. *London Directory for 1872-73*. Montreal: Cherrier and Kirwin.
- City of London. 2016. *The London Plan*. Electronic Document: <https://london.ca/government/council-civic-administration/master-plans-strategies/london-plan-official-plan>. Last accessed: July 6, 2021.
- City of London. 2019. *City of London Register of Cultural Heritage Resources*. Electronic Document: <https://london.ca/sites/default/files/2020-10/Register-2019-AODA.pdf>. Last Accessed: July 6, 2021.
- City of London. 2021. *City of London Land Acknowledgement*. Electronic Document: <https://london.ca/city-london-land-acknowledgement>. Last Accessed: July 6, 2021.
- Craig, Gerald R. 1963. *Upper Canada: The Formative Years*. Don Mills: University of Toronto Press.
- Crispino, M. and M. D'Apuzzo. 2001. Measurement and Prediction of Traffic-induced Vibrations in a Heritage Building. *Journal of Sound and Vibration* 246 (2): 319-335.
- Curtis, Bruce E. 1992. *The Boundary Adjustment Process: The Case of Arbitration in the Greater London Area*. Electronic Document: [https://localgovernment.uwo.ca/resources/docs/research\\_papers/1992/Curtis,%20Bruce%20-%201992.pdf](https://localgovernment.uwo.ca/resources/docs/research_papers/1992/Curtis,%20Bruce%20-%201992.pdf). Last Accessed: July 23, 2021
- Dominion Bureau of Statistics. 1953. *Ninth Census of Canada, 1951, Volume 1—Population*. Ottawa: Edmond Cloutier.
- Dominion Bureau of Statistics. 1962. *1961 Census of Canada, Series 1.1, Population*. Ottawa: Dominion Bureau of Statistics.
- Ellis, Patricia. 1987. Effects of Traffic Vibration on Historic Buildings. *The Science of the Total Environment* 59: 37-45.
- Eqbal, Amelia. 2020. *London Neighbourhood Histories: SoHo—Built to Last, with Room to Grow*. Electronic Document: <https://londonfuse.ca/london-neighbourhood-histories-soho>. Last Accessed: July 7, 2021.



## HERITAGE IMPACT ASSESSMENT—254 HILL STREET, LONDON, ONTARIO

June 9, 2022

- Find-A-Grave. 2021. *Job Cousins*. Electronic Document: <https://www.findagrave.com/memorial/221100133/job-cousins>. Last Accessed: July 13, 2021.
- Flanders, Douglas. 1977. *The South London Planning District: A Report for the Local Advisory Committee for Architectural Conservation in London, Ontario*. On File at London Public Library.
- Gladstone, Bill. 2011. *A History of the Jewish Community of London, Ontario*. Toronto: Now and Then Books.
- Glover, E.S. 1872. *Bird's Eye View of London, Ontario, Canada*. Cincinnati: Strobridge & Co. Lith.
- Government of Ontario. 1990. *Planning Act, R.S.O. 1990, CHAPTER P.13*. Electronic Document: <https://www.ontario.ca/laws/statute/90p13>. Last accessed: July 6, 2021.
- Government of Ontario. 2006a. *Ontario Regulation 9/06, Criteria for Determining Cultural Heritage Value or Interest, Under the Ontario Heritage Act*. Electronic document: <https://www.ontario.ca/laws/regulation/060009>. Last accessed: July 6, 2021.
- Government of Ontario. 2006b. InfoSheet #5 in *Heritage Resources in the Land Use Planning Process, Cultural Heritage and Archaeology Policies of the Ontario Provincial Policy Statement, 2005*. Ministry of Heritage, Sport, Tourism, and Culture Industries Toronto: Queen's Printer for Ontario.
- Government of Ontario. 2020. *Provincial Policy Statement, 2020*. Electronic Document: <https://files.ontario.ca/mmah-provincial-policy-statement-2020-accessible-final-en-2020-02-14.pdf>. Last Accessed: July 6, 2021.
- Hunter and Cullery. 1856. *Directory of London, C.W.* London: Hunter and Cullery.
- Landon, Fred. 1919. Fugitive Slaves in London Before 1860. In *Ontario's African-Canadian Heritage, Collected Writings of Fred Landon, 1918-1967*. 2009 compilation. Toronto: Natural Heritage Books.
- Library and Archives Canada. 1881. *Census of Canada 1881*, District 170, Sub-District C, Reel C-13270.
- Library and Archives Canada. 1901. *Census of Canada 1901*, District 86, Sub-District A, Reel T-6480.
- Library and Archives Canada. 1921. *Census of Canada 1921*, District 101, Subdistrict 5, Item 2389936.
- London Health Sciences Centre. 2021. *Our History*. Electronic Document: <https://www.lhsc.on.ca/about-lhsc/our-history>. Last Accessed: July 7, 2021.
- London Township History Book Committee. 2001. *London Township: Volume 1: A Rich Heritage 1796-1997*. Aylmer: London Township History Book Committee.
- Meligrana, John F. 2000. The Politics of Municipal Annexation: The Case of the City of London's Territorial Ambitions during the 1950s and 1960s. *Urban History Review* 291: 3-20.



## HERITAGE IMPACT ASSESSMENT—254 HILL STREET, LONDON, ONTARIO

June 9, 2022

- Might Directories. 1892. *London City and Middlesex County Directory, 1892*. London: Might's Directory Co.
- Might Directories. 1895. *The London City and Middlesex County Directory*. Toronto: Might Directory Co.
- Miller, Orlo. 1992. *London 200: An Illustrated History*. London: Chamber of Commerce.
- Mombourquette, John. 1992. London Postponed, John Graves Simcoe and His Capital in the Wilderness. In *Simcoe's Choice, Celebrating London's Bicentennial*. Edited by Guy St-Denis, pp. 1-30.
- Murphey, Wrigley S. *City of London Directory for 1863-4*. London: Thomas Evans.
- ONLand. 2021. *Pt Lt 2, N/W Hill St, Being W ½ ; London*. On File at Stantec.
- Page. H.R. & Co. 1878. *Illustrated Historical Atlas of the County of Middlesex*: Toronto: Correll, Craig & Co. Lith. Toronto.
- Railroad Trainmen's Journal. July to December 1900. *Railroad Trainmen's Journal*. Electronic Document: [https://books.google.ca/books?id=s9rNAAAAMAAJ&pg=PA625-IA25&pg=PA625-IA25&dq=254+hill+street+london+ontario&source=bl&ots=Gfx0WjgRn1&sig=ACfU3U2scK4ZHnP\\_LqnGtfY0UWHpSgzn3A&hl=en&sa=X&ved=2ahUKEwiqqcH\\_sOHxAhULQ80KHWnbAI8Q6AEwB3oECBUQAw#v=onepage&q=254%20hill%20street%20london%20ontario&f=false](https://books.google.ca/books?id=s9rNAAAAMAAJ&pg=PA625-IA25&pg=PA625-IA25&dq=254+hill+street+london+ontario&source=bl&ots=Gfx0WjgRn1&sig=ACfU3U2scK4ZHnP_LqnGtfY0UWHpSgzn3A&hl=en&sa=X&ved=2ahUKEwiqqcH_sOHxAhULQ80KHWnbAI8Q6AEwB3oECBUQAw#v=onepage&q=254%20hill%20street%20london%20ontario&f=false). Last Accessed: July 13, 2021.
- Rainer, J.H. 1982. Effects of Vibrations on Historic Buildings. *The Association for Preservation Technology* XIV (1) 2-10.
- SoHo Community Association. 2020. *Hear, Here: Stories from the Fugitive Slave Chapel*. Electronic Document: <https://soholondon.ca/hear-here-stories-from-the-fugitive-slave-chapel/>. Last Accessed: July 7, 2021.
- SoHo Community Association. 2021. *Updates*. Electronic Document: <https://soholondon.ca/updates/>. Last Accessed: July 7, 2021.
- Statistics Canada. 2019. *Census Profile, 2016 Census, London, City*. Electronic Document: <https://www12.statcan.gc.ca/census-recensement/2016/dp-pd/prof/details/Page.cfm?Lang=E&Geo1=CSD&Code1=3539036&Geo2=PR&Code2=47&Data=C&SearchText=North&SearchType=Begins&SearchPR=01&B1=All>. Last Accessed: January 6, 2021.
- Sutherland and Co. 1866. *London General and Business Directory*. Woodstock: Sutherland and Co.
- Tausky, Nancy Z. and Lynne D. DiStefano 1986. *Victorian Architecture in London and Southwestern Ontario*. Toronto: University of Toronto Press.
- Taylor, Alan. 2007. The Late Loyalists: Northern Reflections of the Early American Republic. *Society for Historians of the Early American Republic* 27 (1) (Spring 2007):1-34.



## HERITAGE IMPACT ASSESSMENT—254 HILL STREET, LONDON, ONTARIO

June 9, 2022

Vernon Directories. 1909. *Vernon's City of London Directory 1909-1910*. Hamilton: Henry Vernon & Son.

Vernon Directories. 1915. *Vernon's City of London Directory 1915*. Hamilton: Henry Vernon.

Vernon Directories. 1922. *Vernon's City of London Directory 1922*. Hamilton: Henry Vernon.

Vernon Directories. 1955. *Vernon's City of London Directory 1955*. Hamilton: Henry Vernon.

Wiss, J.F. 1981. Construction Vibrations: State-of-the-Art. *Journal of Geotechnical Engineering Division* 107: 167-181.



# **APPENDIX A**

## **Concept Plan**





# **APPENDIX B Structural Condition Evaluation**





## Inspection Report

If you do not receive all pages please contact 1-226-270-9921

**Date:** Thursday, February 17, 2022

**Project: No.** 207022

**To:** Level Contracting

**Attn:** Jose Pinheiro

**Re:** Structural Condition Evaluation – 254 Hill Street

**No. of Pages:** 4

See attached,

1. Inspection Report

**Distribution:**

**PER: Dwayne C. Buck, P.Eng**

## Inspection Report

To: Level Contracting  
London, Ontario

Re: Structural Condition Evaluation  
254 Hill Street  
London, Ontario

Attn: Jose Pinheiro  
Project No. 207022

Date: Thursday, February 17, 2022

DC Buck Engineering Corp was contacted to provide an evaluation of the structural condition of the building at the above mentioned site due to vacant condition. The following was observed at the site;

### **Background:**

1. The building consists of a two storey single residential building with exterior load bearing brick wall and wood frame floor and roof construction on poured concrete foundations.
2. The inspection of the property was completed by the Principal Engineer at DC Buck Engineering Corporation, Dwayne C. Buck, P.Eng.
3. The building was visually inspected to confirm the current conditions of the building due to it being vacant and exposed to the elements.
4. The building was visually inspected from the interior of the building.

### **Observations:**

1. The building consists of two storeys and all rooms were visually inspected.
2. The building does not have any utilities for heat or hydro.
3. Sections of roof are open and allowing the elements to penetrate into the main building structure on both floors. The floor structure has rotten sections on the second floor and the main floor including the floor sheathing and the floor joists. Some sections are not safe and areas of hazardous falling are present.
4. Multiple floor joists in the basement areas were observed to have significant rot and it is appearing that the lateral support of the top of the foundation is compromised due to the rot in the joists.
5. Most areas of the building are covered in black mold.

Insert site photo's







**Evaluation comments:**

1. Based on the visual inspection it is my opinion that the existing building main structure is not sound. The structure in its current condition is not safe and does pose a hazard to any person entering the building and the surrounding buildings.
2. It is my recommendation that the existing structure be removed.
3. All work to be completed by qualified contractors.

We trust this report is adequate for your use for the review of the existing building conditions. If you require any further information regarding this matter. please contact the under signed at your convenience.

Yours Truly,  
DC Buck Engineering Corp.

A handwritten signature in black ink that reads "Dwayne C. Buck".

Dwayne C. Buck, P.Eng

