

# Heritage Impact Assessment

Royal Host GP Inc. & Holloway Lodging

320 King Street

City of London



October 6, 2022



## EXECUTIVE SUMMARY

Zelinka Priamo Ltd. was retained by Royal Host GP Inc. and Holloway Lodging to prepare a Heritage Impact Assessment (HIA) as a background document for the proposed redevelopment of the lands known municipally as 300-320 King Street (hereinafter referred to as the “subject lands”) for a 35-storey, 435-unit high-rise residential development. The proposed development is to be located on lands currently used for a parking structure. The existing hotel on the subject lands is to remain. This HIA involves a built heritage assessment to assist the City of London (the City) with its decision-making process regarding rezoning approval.

The purpose of this HIA is to determine if the identified built heritage resources will be impacted by the proposed development by responding to provincial and municipal policy requirements regarding the conservation of built heritage resources in the land use planning process. Consideration must be given to the conservation of heritage resources where a development or site alteration is proposed within or adjacent to a protected heritage property.

This report will identify and evaluate the heritage value of those properties adjacent to the proposed development; identify potential impacts to the identified heritage resources; and, propose appropriate mitigation measures and recommendations for minimizing and avoiding potential negative impacts of the identified heritage resources.

The HIA determined that there are potential indirect impacts to adjacent properties resulting in vibration impacts from construction activities. Given the presence of cultural heritage resources which have the potential to be affected by the proposed development, the following mitigation measures have been recommended:

- Appropriate construction methodologies to be prepared, if required, and careful adherence to such methodologies to prevent any undue impacts to adjacent identified cultural heritage resources as per the City’s Development and Construction Standards; and,
- If required, monitoring for possible construction/demolition impacts such as vibrations would occur during the construction phase of the proposed development.

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## 1.0 INTRODUCTION

Zelinka Priamo Ltd. was retained by Royal Host GP Inc. and Holloway Lodging to prepare a Heritage Impact Assessment (HIA) as a background document for the proposed redevelopment of the lands known municipally as 300-320 King Street (hereinafter referred to as the “subject lands”) for a 35-storey, 435-unit high-rise residential development. The proposed development is to be located on lands currently used for a parking structure. The existing hotel on the subject lands is to remain. This HIA involves a built heritage assessment to assist the City of London (the City) with its decision-making process regarding rezoning approval.

### 1.1 Purpose

The purpose of this HIA is to determine if the identified built heritage resources will be impacted by the proposed development by responding to provincial and municipal policy requirements regarding the conservation of built heritage resources in the land use planning process. Consideration must be given to the conservation of heritage resources where a development or site alteration is proposed within or adjacent to a protected heritage property.

This report will identify and evaluate the heritage value of those properties adjacent to the proposed development; identify potential impacts to the identified heritage resources; and, propose appropriate mitigation measures and recommendations for minimizing and avoiding potential negative impacts of the identified heritage resources.

### 1.2 Subject Lands

The subject lands are located at the northwest corner of the King Street and Waterloo Street intersection. The subject lands consist of multiple irregularly-shaped parcels, including a portion of the lands known municipally as 275 Dundas Street; the entirety of 300 King Street; and the entirety of 320 King Street. The irregularly-shaped lands have an area of approximately 0.73ha with frontages of approximately 105m along King Street and approximately 50m along Waterloo Street. The subject lands abut the Delta Armouries hotel and a parking lot to the north; Waterloo Street to the east; King Street to the south; and, the City Centre (TD) towers to the west. RBC Place is located opposite the subject lands on the south side of King Street; and, the Centre Branch YMCA facility is located opposite the subject lands on the east side of Waterloo Street.

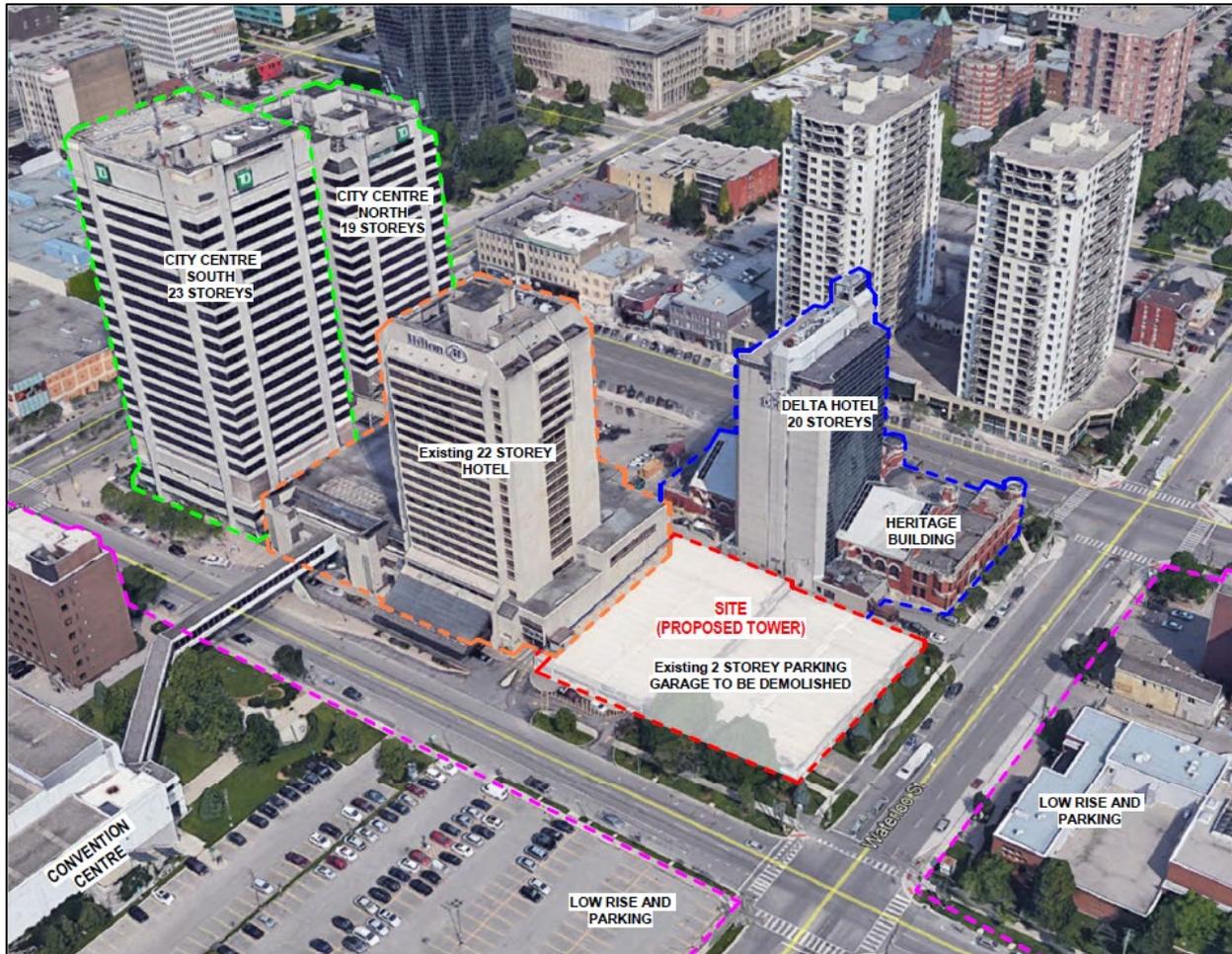
The subject lands are currently occupied by an existing 22-storey hotel building and an existing 2-level parking structure, which is wholly located on 320 King Street. A Site Plan Approval application is currently being processed to permit the conversion of part, or all, of the hotel units to residential units.

The subject lands are generally flat in topography. Several street trees are located around the perimeter of the existing parking structure.

Existing vehicular access is provided along King Street, leading to a lay-by in front of the existing hotel building, to the underground parking ramp, and to the existing parking structure. The

vehicular portion of the King Street right-of-way consists of two, one-way eastbound lanes, with turning lanes where necessary. A grassed landscaped strip provides a small buffer between the pedestrian sidewalk, located on both sides of the King Street right-of-way, and the outermost vehicular lane. Signalized intersections at both Wellington Street/King Street and Waterloo Street/King Street control pedestrian and vehicular traffic.

Image 1 – Subject lands



### 1.3 Study Area

The study area includes the adjacent properties to the subject lands, at 325 Dundas Street, 275 Dundas Street, and 362 Waterloo Street (Image 2), that are listed or designated on the *City of London Register of Cultural Heritage Resources*.

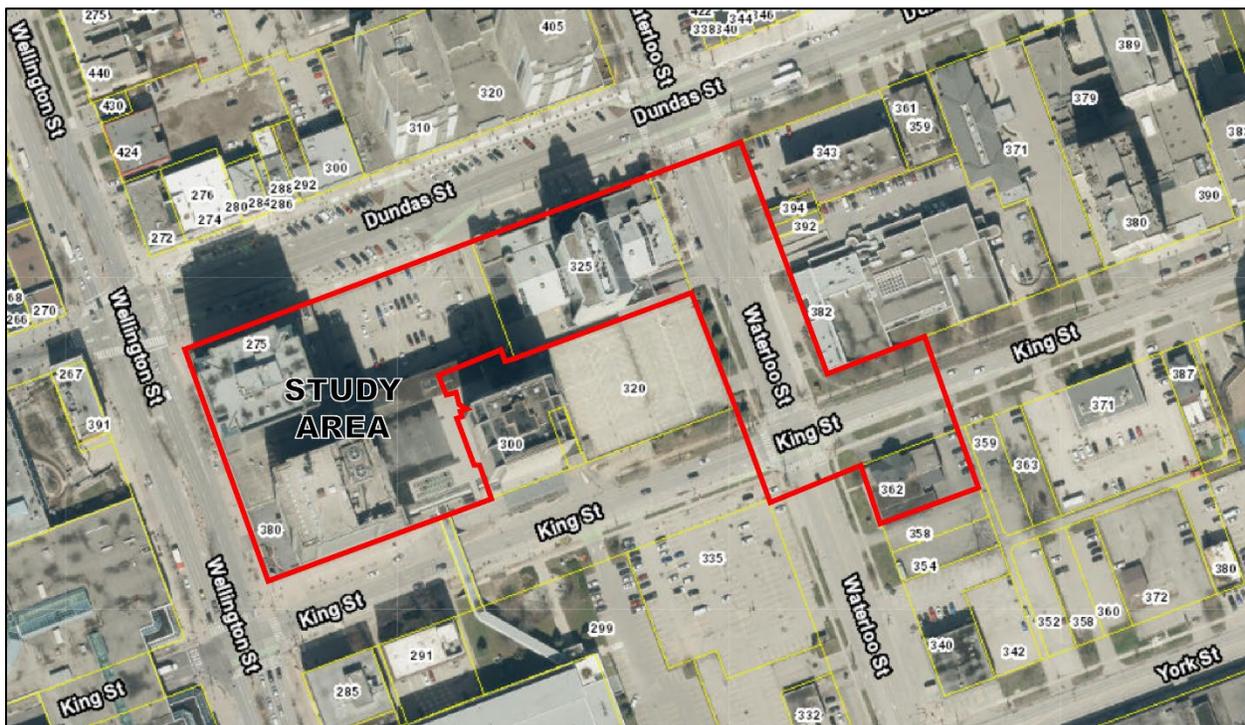
325 Dundas Street (Image 3), well-known as the Delta London Armouries Hotel, is a designated heritage property under Part V of the *Ontario Heritage Act*. The Delta London Armouries was built in 1905 in the Romanesque Revival architectural style. The Armouries feature a solid red brick construction, with a stone base, cylindrical turrets, stylized archways over the windows, and a wide arch at the entrance, designed by Canadian architect David Ewart (Iocorum, 2021). The

Armouries served the City for decades as a training facility and weapons storage for reserve and regular army units. The building opened as a 20-storey hotel in 1986. 325 Dundas Street is located at the southwest corner of the Dundas Street and Waterloo Street intersection, directly adjacent to the subject lands to the north.

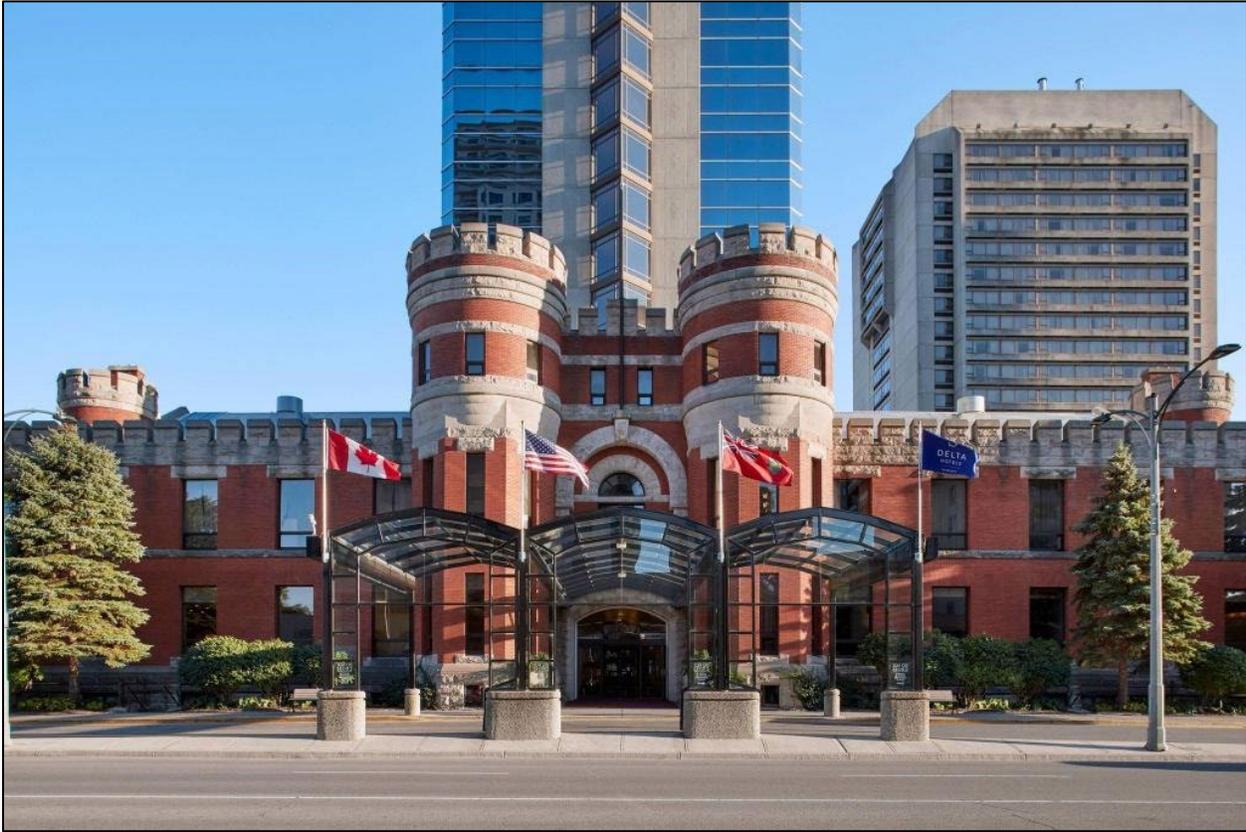
275 Dundas Street (Image 4), known as the City Centre Towers or Canada Trust Towers, is a designated heritage property under Part V of the *Ontario Heritage Act*. The property consists of two towers, City Centre north (19-storeys) and City Centre south (23-storeys), built 1974 in the Brutalist architectural style. The towers rise from a wide base with each façade dominated by two vertical strips of precast material into which alternating horizontal bands of glass and precast material are integrated. 275 Dundas Street is directly adjacent to the subject lands to the west, and abut King Street to the south; Wellington Street to the west; and, Dundas Street to the north. This property, and 325 Dundas Street, was added to the *Register* by Municipal Council on June 27, 2013.

362 Waterloo Street (Image 5), known as Donohue Funeral Home, is a listed heritage property occupied by a 2-storey red brick building with an unknown building date. 362 Waterloo Street is located at the southeast corner of the King Street and Waterloo Street intersection, opposite the subject lands. This property was added to the *Register* by Municipal Council on March 27, 2018.

Image 2 – Study area



**Image 3 – 325 Dundas Street (Delta London Armouries Hotel)**



**Image 4 – 275 Dundas Street (City Centre towers / Canada Trust towers)**



Image 5 – 362 Waterloo Street (Donohue Funeral Home)



## 2.0 BUILT HERITAGE RESOURCE ASSESSMENT CONTEXT

### 2.1 Policy Framework

#### 2.1.1 The Planning Act

The *Planning Act* is provincial legislation that provides a framework for land use planning in Ontario. One of the general purposes of the *Planning Act* is to integrate matters of provincial interest in provincial and municipal planning decisions. Part I of the *Planning Act* identifies that the Minister, municipal councils, local boards, planning boards, and the Ontario Land Tribunal shall have regard to matters of provincial interest, such as:

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

#### 2.1.2 The Provincial Policy Statement, 2020

The *Provincial Policy Statement (PPS)*, issued under the authority of Section 3 of the *Planning Act* and updated in 2020, provides policy direction on matters of provincial interest related to land use planning in order to ensure efficient development and protection of natural resources. All planning applications required to be consistent with these policies. The PPS has several provisions relating to heritage conservation.

The relevant policies for the conservation of cultural heritage features are contained in Section 2 – Wise Use and Management of Resources, wherein Subsection 2.6 – Cultural Heritage and Archaeological Resources, states the following provisions:

2.6.1 Significant built heritage resources and significant cultural heritage landscapes shall be conserved.

2.6.3 Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property except where the proposed development and site alteration has been evaluated and it has been demonstrated that the heritage attributes of the protected heritage property will be conserved.

Under the PPS definition, 'built heritage resource' means:

*A building, structure, monument, installation or any manufactured or constructed part or remnant that contributes to a property's cultural heritage value or interest as identified by a community, including an Indigenous community. Built heritage resources are located on property that may be designated under Parts IV or V of the Ontario Heritage Act, or that may be included on local, provincial, federal and/or international registers.*

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' in regards to cultural heritage and archaeology means:

*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.*

### 2.1.3 The London Plan

The properties at 325 Dundas Street and 275 Dundas Street are designated heritage properties on the *City of London Register of Cultural Heritage Resources*, and the property at 362 Waterloo Street is a heritage listed property on the *Register*. The City's Official Plan, *The London Plan*, sets out the following policy with regard to 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* defines adjacency as:

*"sites that are contiguous; sites that are directly opposite a cultural heritage resource separated by a laneway, easement, right-of-way, or street; or sites which a proposed development or site alteration has the potential to impact identified visual character, streetscapes or public views as defined within a statement explaining the cultural heritage value or interest of a cultural heritage resource"*

The following general objectives from *The London Plan* regarding cultural heritage resources also apply:

554\_In all of the planning and development we do, and the initiatives we take as a municipality we will:

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.

Under *The London Plan* definition, 'cultural heritage resource' means:

*A human work or a place that gives evidence of human activity or has spiritual or cultural meaning or value, and which has been determined to have historic value. Cultural heritage resources include both the physical and intangible resources, properties protected under the Ontario Heritage Act, built heritage resources, cultural heritage landscapes, archaeological resources, paleontological resources and both documentary and material heritage.*

The following design objective from *The London Plan* is applicable:

565\_ New development, redevelopment, and all civic works and projects on and adjacent to heritage designated properties and properties listed on the Register will be designed to protect the heritage attributes and character of those resources, to minimize visual and physical impact on these resources. A heritage impact assessment will be required for new development on and adjacent to heritage designated properties and properties listed on the Register to assess potential impacts and explore alternative development approaches and mitigation measures to address any impact to the cultural heritage resource and its heritage attributes.

#### *2.1.4 Downtown London Heritage Conservation District Plan*

The proposed development and part of the study area reside in within the Downtown London Heritage Conservation District. Therefore, the guidelines of the Downtown London Heritage Conservation District Plan are applicable. The purpose of the Plan is stated below.

The purpose of this Heritage Conservation District Plan is to establish a framework by which the heritage attributes of the Downtown can be protected, managed and enhanced as this area continues to evolve and change over time. It will provide property owners, business owners, contractors, and other Downtown stakeholders with clear guidance regarding appropriate conservation, restoration and alteration activities and assist municipal staff and Council in reviewing and making decisions on building permits and development applications within the district.

The intent of the Plan is to assist in the protection and conservation of the unique heritage attributes and character of London's Downtown. The Plan provides guidelines for new construction to ensure the conservation of character-defining elements of the buildings any new construction will neighbour. These elements and associated guidelines are listed below.

- **Façade composition and height** are two major components in maintaining the character of the current streetscapes. A single excessively tall and imposing structure can completely alter the pedestrian-focused atmosphere of the Downtown. Use roof shapes and major design elements that are complementary to surrounding buildings and heritage patterns.

- **Setbacks** of new development should be consistent with adjacent buildings. New buildings and entrances must be oriented to the street and are encouraged to have architectural interest to contribute to the streetscape. Respond to unique conditions or location, such as corner properties, by providing architectural interest and details on both street facing facades.

## 2.2 Impact Assessment Criteria

The impact assessment on cultural heritage resources is based on the impacts as defined by *Infosheet #5 Heritage Impact Assessments and Conservation Plans* prepared by the Ontario Ministry of Heritage, Sport, Tourism and Culture Industries. 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 cause destruction or alteration of the cultural heritage resource, but may include:

- **Shadows** created 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 context or a significant relationship.
- **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 soils, and drainage patterns that adversely affect an archeological resource.

In addition, the potential for indirect impacts resulting from vibration resulting from construction activities should be considered. For the purpose of this HIA, this impact has been categorized under “land disturbances”. Although the impacts of vibration on heritage buildings are not thoroughly studied or well understood, studies have shown that impacts may be perceptible within a 40m radius of development activities including demolition of existing structures, road traffic, and construction of new development (M. Crispino, 2001; Ellis, 2003) and consideration should be given to this potential impact. If left unaddressed, it could result in long-term issues for the maintenance, use, and conservation of the heritage resources.

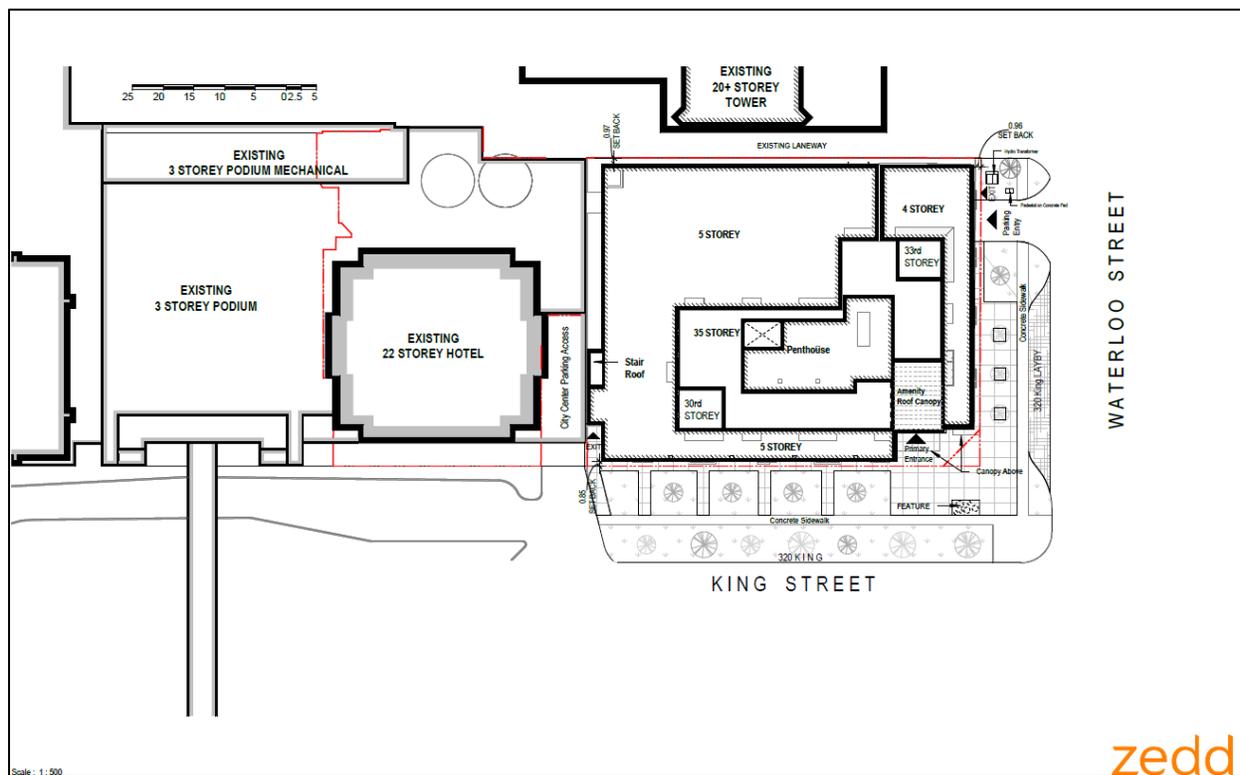
### 3.0 IMPACT ASSESSMENT

#### 3.1 Proposed Development

The easterly portion of the subject lands (320 King Street) is proposed to be redeveloped for a new 35-storey, 435-unit residential apartment building (Image 6). The existing parking structure is to be removed. A density of 595UPH (units per hectare) is proposed for the development. The proposed building and the existing building, if converted to apartments, would yield a total site density of approximately 940UPH.

The new 35-storey residential apartment building is comprised of a 4- and 5-storey podium across the entire site, a 25-storey central tower with a floor plate of 1,008m<sup>2</sup>, a 4-storey slimmer tower, and a 1-storey penthouse. The total building height is to be approximately 111m. The podium is comprised of commercial space on the ground floor, a parking structure on the interior, including bicycle storage, with apartment units wrapping around the King Street and Waterloo Street frontages on floors 2-4. A rooftop amenity area is proposed above the four-storey podium, and the upper roof.

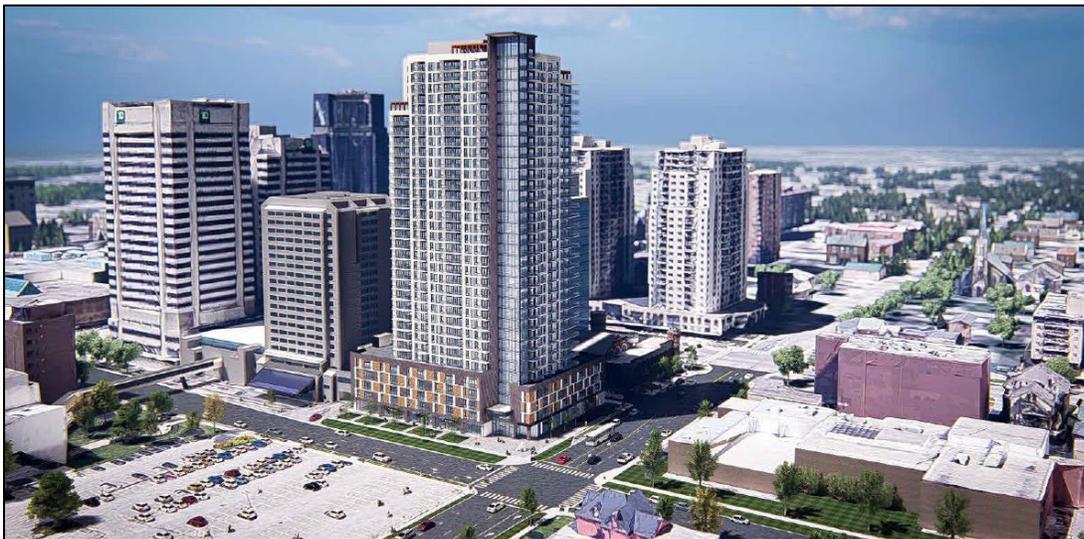
Image 6 - Conceptual Site Plan (excerpt)



The proposed building is oriented along, and located close to, the King Street streetscape. The primary building entrance will be located along the King Street frontage with a canopy and signage to clearly define the entrance along the streetscape. Several pedestrian pathways connect the commercial uses on the ground floor to the existing municipal sidewalk on King Street. The site design provides a 0.85m front yard setback from King Street and a 0.96m exterior side yard setback from Waterloo Street to maintain the established street-walls of adjacent buildings and contribute to a positive pedestrian public realm (Image 7).

The building is articulated by distinct building façades. The design recognizes the vertical division and articulation of the range of unit layouts in the building with the use of a mix of high-quality building materials. The tower-over-podium built form provides a pedestrian oriented interface to ensure the building is designed according to a human scale. A variety of materials, colours, and textures break the massing of the building into smaller sections, both vertically and horizontally, to appropriately frame the street and enhance the streetscape (Image 8).

**Image 7 – Architectural rendering, overall view**



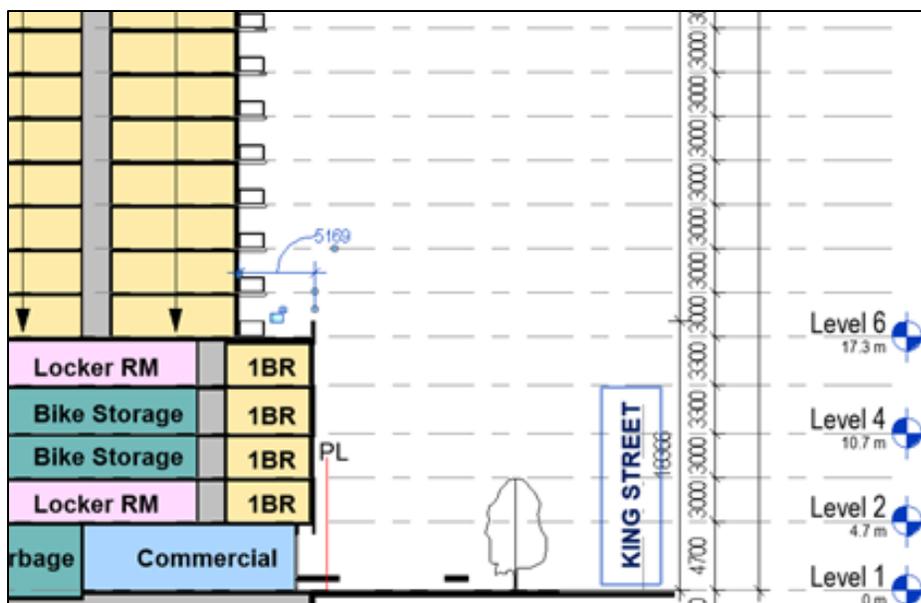
**Image 8 – Architectural rendering, perspective along King Street**



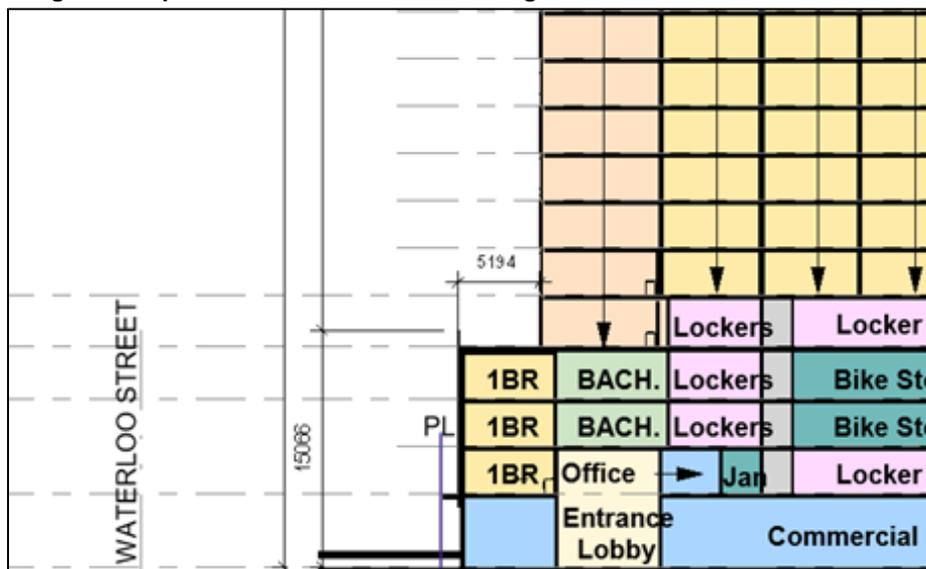
A 35-storey building, as proposed, is a significant contribution to the City of London skyline. The Downtown London HCD considers multi-storey buildings to be a defining characteristic of the District. When a building exceeds the typical established building height within the District, the HCD Plan provides for a building step back from the street frontage to minimize the spatial impact to the streetscape, and to ensure a human-scale is established. The step back is required at the 18.0m height with a step back distance of 5.0m. The resulting podium at the base of the tower distinguishes itself well from the massing of the upper tower.

The proposed building provides a step back above the podium at both the King Street and Waterloo Street frontages. The podium is approximately 17.3m in height and the provided step back to the tower is approximately 5.2m at both the King Street and Waterloo Street frontages (Images 8-9).

**Image 8 – Step back at King Street frontage**



**Image 9 – Step back at Waterloo Street frontage**



The exterior design of the proposed building is anticipated to provide an attractive and well-executed design with modern architectural details, drawing inspiration from the surrounding architectural elements and materials while remaining noticeably distinct. Notably, the brown and red brick used for the podium pays homage to the materials used for the Delta Armouries, and continues vertically up portions of the building. The overall design of the proposed building is intended to convey a modern look while remaining respectful to the historical character of the surrounding neighbourhood.

**Image 10 – Elevation along Waterloo Street**



## 3.2 Assessment of Impacts

The following discussion addresses anticipated and potential impacts of the proposed development on built heritage attributes of at 325 Dundas Street, 275 Dundas Street, and 362 Waterloo Street. Generally speaking, no direct impacts were identified for the buildings as the proposed development will be entirely restricted to the adjacent property at 320 King Street. The identified heritage attributes relate exclusively to building form, materials, and architectural details. Given this, the proposed development will not affect the heritage resources directly.

In contrast, the indirect impact on land disruption has the potential to reach beyond the extent of the proposed development and reach the adjacent heritage resources. Vibration effects may be experienced where construction activities are expected. While the impacts of vibration on heritage buildings are not thoroughly studied or well understood, studies have shown that impacts may be perceptible within a 40m radius of development activities including demolition of existing structures, road traffic, and construction of new development. It is unclear at this time how these factors could impact the heritage resources long-term.

No other indirect impacts on the heritage resources from the proposed developed were identified. While the proposed development is likely to cause shadows where they may not currently exist, shadowing on the building form, materials, and architectural details is not anticipated to be permanent as they will fluctuate throughout the day and season and will not cause alteration or destruction.

Isolation and obstruction typically deal with relationships between heritage resources and their associated views. The proposed development is located across the King Street and Waterloo Street intersection from 362 Waterloo Street. From the pedestrian level, the proposed development may obstruct the view of 325 Dundas Street if looking directly north from King Street. However, this is not considered to be a significant view. As such, no attributes will be isolated and no significant views will be obstructed by the proposed development.

The subject lands are proposed to be redeveloped from a two-level parking garage to a 35-storey high-rise building. While there is a significant change in land use proposed, the land use will be similar and complimentary to the existing surrounding uses.

A summary of these findings is included in Table 1 below. Where no impacts to heritage resources are anticipated, 'N' is listed in the 'Impact Potential' column. Where potential impacts to heritage resources are anticipated, 'P' is listed in the column.

**Table 1 – Impact Assessment**

<b>Possible Impact</b>	<b>Proposed Development</b>	<b>Impact Potential</b>
Destruction	Study Area buildings will be maintained as-is.	N
Alteration	Study Area buildings will be maintained as-is.	N
Shadows	Proposed height is complementary to the neighbourhood.	N
Isolation	No isolation of heritage attributes.	N
Obstruction	View from streetscape will not be significantly affected.	N
Land Use Change	Proposed land use is consistent with surrounding land uses.	N
Land Disturbance	Possible vibration from construction activities.	P

## **4.0 MITIGATION, IMPLEMENTATION, AND MONITORING**

### **4.1 Potential Mitigation Measures**

The proposed development has the potential to result in indirect impacts to the identified heritage resources. As such, mitigation measures may be required. Several methods of minimizing or avoiding potential impacts on heritage resources resulting from project activities are described in InfoSheet #5; of the options presented, the establishment of buffer zones, site plan controls, and other planning mechanisms best avoid impacts related to potential vibration effects.

### **4.2 Mitigation Discussion**

As the study area properties are situated directly adjacent or opposite King Street to the proposed development with construction activities anticipated within 40m of the study area, indirect impacts from vibration are possible. Where construction activities are anticipated proximate to heritage resources, monitoring activities of vibration levels can gauge whether such activities exceed acceptable vibration levels as determined by a qualified engineer.

An approach to mitigating the potential vibration effects can be done in two stages: first, if required, to develop appropriate construction methodologies in the form of site plan controls, site activity monitoring, or avoidance; second, further action can be taken, if deemed necessary, in the form of monitoring for possible construction and/or demolition impacts such as vibrations during the construction phase.

## 5.0 RECOMMENDATIONS

The assessment of impacts resulting from the proposed development at 320 King Street has determined that the proposed development could have possible indirect impacts related to vibration effects to the adjacent identified cultural heritage resources at 325 Dundas Street, 275 Dundas Street, and 362 Waterloo Street. Based on the identified impacts, the following mitigation measures are recommended:

- Appropriate construction methodologies to be prepared, if required, and careful adherence to such methodologies to prevent any undue impacts to adjacent identified cultural heritage resources as per the City's Development and Construction Standards; and,
- If required, monitoring for possible construction/demolition impacts such as vibrations would occur during the construction phase of the proposed development.

## 6.0 REFERENCES

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