

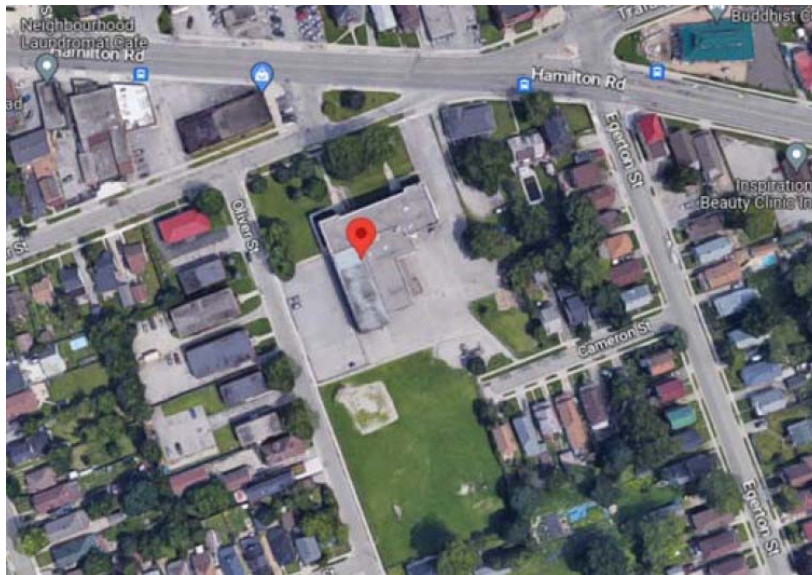
HERITAGE IMPACT ASSESSMENT MEMO

Project:	Townhouse Infill	Project No.:	2044
Location:	165-167 Egerton Street, London ON	Date:	2023 03 09

a+LiNK Architecture Inc has been retained by Gerald Pedros (property Owner) to prepare a Heritage Impact Assessment (HIA) Memo to assess the potential impacts of the proposed residential infill development at 165-167 Egerton Street on a LISTED Heritage Resource located 919 Trafalgar Street. This HIA memo was prepared according to the general guidelines set out in the Ontario Ministry of Tourism, Culture, and Sport (MTCS) *Infosheet #5 Heritage Impact Assessment and Conservation Plans*, as well as application-specific guidelines provided by the City of London. The memo is intended to respond to the impacts (or lack of negative impacts) of the proposed townhouse development on the adjacent cultural heritage resource.

PROJECT SUMMARY

The Owner of 165-167 Egerton Street is proposing a townhouse infill development on the property. The concept design of the proposed development was submitted for Pre-Consultation to the City of London on May 7, 2021 to review the proposed development and confirm the submission requirements for a Site Plan Approval application. In the subsequent Record of Site Plan Consultation, dated June 8, 2021, the City indicated that an HIA must be submitted along with the Site Plan Application as the site is located directly adjacent to 919 Trafalgar Street, a property listed on the City's Inventory of Heritage Resources. It is our understanding that the City indicated that it would be acceptable for the applicant to provide an HIA Memo prepared by a heritage consultant to address this requirement.



1 Aerial View showing relation of school to development property / Source: Google Maps

SITE DESCRIPTION

919 Trafalgar Street is located near the intersection of Hamilton Road and Egerton Street. The Listed property is situated in the southeast area of London's core, in the Hamilton Road Area. This portion of Trafalgar Street is slightly set back from the arterial road of Horton Road which is lined with predominantly commercial properties and backs onto the surrounding residential neighborhood. The footprint of the existing Trafalgar Public School aligns with Trafalgar Street, where the main entrance is located.

Due to the building's proximity to the north end of the property, a broad vacant space containing a playground and a baseball field exists between the school building and the lots to the south of the property. The neighbouring properties to the west, south and east predominantly consist of single-family residential lots. The south east corner of the subject property is adjacent to the north west corner of the proposed residential development.

HISTORICAL CONTEXT

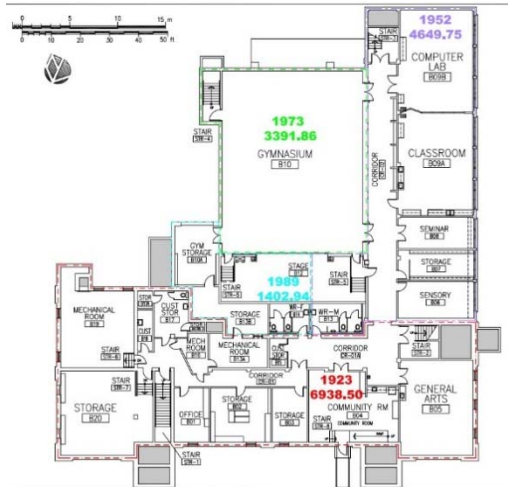
Trafalgar Public School, located at 919 Trafalgar Street, is included in the City of London Register of Cultural Heritage Resources as a heritage Listed property.

The main architectural style that the school falls under is Collegiate Gothic, which is commonly used for academic buildings and other structures from the early twentieth century. It includes Gothic Revival details, arched doorways and windows, often repetitive and can have symmetrical elements and sometimes including steep gables or towers.



2 Historic Photo showing Trafalgar Public School from Hamilton Road in 1939 / Source: Western University Archives, London Free Press Negative Collection, Mike Rice via Vintage London

The Trafalgar Public School opened in 1923. Later, in 1940, it was taken over by the army to operate as a military hospital for 5 years. In 1945, it was no longer needed by the army, and was reopened as a school to resolve the overcrowding that was happening in nearby schools. It currently operates as a public school under the Thames Valley District School Board.



The current footprint is an accumulation of additions that have been built over different periods of time onto the original building. The original footprint from 1923 was rectangular in shape, with the main façade prominently facing the street. The first addition, built in 1952, was a second linear volume, placed perpendicular to the main building as a rear extension to the west wing. The resultant form became an L-shaped footprint. Later, the semi-enclosed space between the original building and the first addition was built through two additions, during 1973 and 1989, to further expand the size of the school, resulting in the current building massing.

3 Floor plan showing the phases of additions on the school / Source: Thames Valley District School Board

Under the Register of Cultural Heritage Resources, the property at 919 Trafalgar Street is listed as a Collegiate Gothic architectural style, including Gothic Revival details, arched doorways and windows, and gables, implying that only these features of the building provoke heritage interest. This style is only evident in the original building that is situated on the north portion of the property, facing Hamilton Road. The rear additions facing the neighborhood to the south were built in a different architectural style that were current with the age that they were built in (1950's-1970's).



4 Recent Photo showing the different architectural styles between the original building at the north and the later addition to the south / Source: schooldirectory.tvdsb.ca

HERITAGE PLANNING FRAMEWORK

The Planning Act and the Provincial Policy Statement

The Planning Act (1990) and the Provincial Policy Statement (PPS) provide a legislative and policy framework for land use planning in Ontario. Section 2 of the Planning Act directs municipal councils to have regard for *“the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest”* as a matter of Provincial interest. The PPS also recognizes the wise use and management of cultural heritage resources as a matter of provincial interest, and states that *“significant built heritage resources and significant cultural heritage landscapes shall be conserved”* (Sec. 2.6.1). Furthermore, the PPS does not permit development or site alteration of lands adjacent to heritage properties, *“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”* (Sec. 2.6.3).

Ontario Heritage Act

The Ontario Heritage Act enables the Province and municipalities to designate individual properties or districts as places of cultural heritage value or interest, according to criteria set out in Ontario Regulation 9/06 (Sec. 29(1)). A property may be designated under Section 29 of the Ontario Heritage Act if it has design or physical value; historic or associative value; or contextual value within the community (O. Reg. 9/06, s. 1 (2)).

1989 Official Plan

Chapter 13 of the London Official Plan (1989) identifies planning objectives and policies associated with the identification, evaluation, and management of cultural heritage resources (including built heritage, archeological resources, Heritage Conservation Districts, and Cultural Heritage Landscapes). The City's heritage planning objectives are to:

- i) Protect in accordance with Provincial policy those heritage resources which contribute to the identity and character of the City;
- ii) Encourage the protection, enhancement, restoration, maintenance, and utilization of buildings, structures, areas, or sites within London which are considered to be of cultural heritage value or interest to the community;
- iii) Encourage new development, redevelopment, and public works to be sensitive to, and in harmony with, the City's heritage resources; and
- iv) Increase public awareness and appreciation of the City's heritage resources, and encourage participation by the public, corporations, and other levels of government in the protection, restoration, and utilization of these resources. (Sec. 13.1).

London Plan

The London Plan, which is partially in force and effect, includes policies related to cultural heritage resource conservation in the City of London. Policy 565 of the London Plan requires that an HIA be undertaken when new development takes place *“on or 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.”

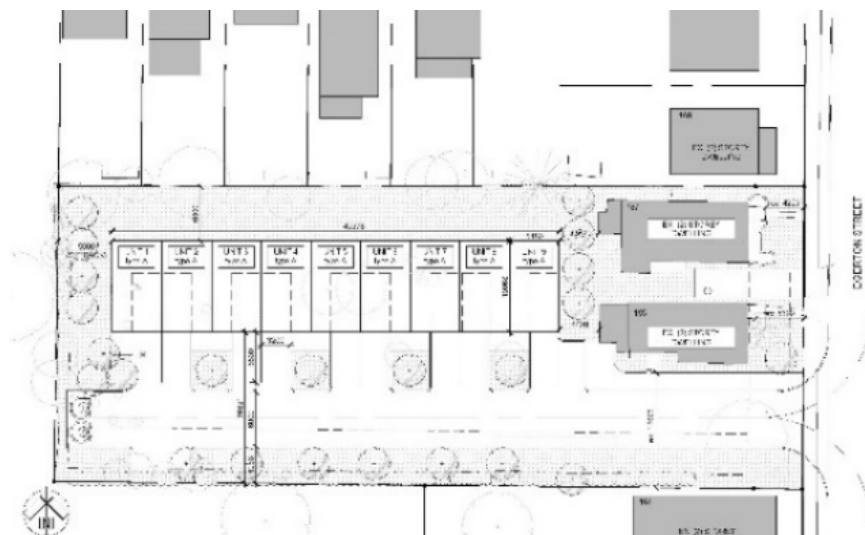
City of London Inventory of Heritage Resources

The Inventory of Heritage Resources (December 2020) identifies over 6,200 buildings and properties which are to be protected and preserved for architectural, historical, or contextual reasons in order to maintain the distinctive character of the City of London. Buildings and properties are ranked by priority level to “*indicate and justify the heritage value of the resources as objectively as possible*”, with Priority #1 buildings being London’s most important and significant heritage resources (Sec. 4.0). The Inventory is used by City Council, the London Advisory Committee on Heritage (LACH), planners, developers, and property owners to help guide development and planning decisions related to heritage matters.

Trafalgar Public School, located at 919 Trafalgar Street, is included in the City of London Register of Cultural Heritage Resources as a Listed property (March 26, 2007). It is listed as being built in 1923 and is in the Collegiate Gothic architectural style.

PROPOSED DEVELOPMENT

The proposed townhouse infill development at 165-167 Egerton Street will provide much needed residential units, adding to the fabric of the neighbourhood. The property itself is comprised of two lots with existing single-family homes fronting Egerton Street. The two lots are to be combined into one to allow for 9 new townhouse units to be located behind the existing houses on the property. The townhouses will be accessed by a driveway off of Egerton Avenue. The portion of the property at 167 Egerton abuts the subject lands at the south east corner, where currently the school’s playing fields are located. It is the intention of the proposed development that the existing mature trees at the rear of the property remain to provide a green buffer along this edge.



5 Concept Site Plan / Source: a+LiNK Architecture Inc.

POTENTIAL IMPACTS

The intention of the development at 165-167 Egerton Street is to provide a small-scale residential infill that fits into the existing neighbourhood context. The top half of the development property backs on to the south east portion of the Listed property where currently the school's playing fields are located. Due to the distance of the property to the existing heritage resource, the proposed development would have not negatively affected the historical character and attributes of Trafalgar Public School. The mature trees that are located at the north east portion of the development property help to provide screening from adjacent subject property, and act as a clear boundary marker along the school grounds. The large playing field at the southern end of the school property provide an additional buffer between the historic school building and the proposed development. In addition to the distance from the building, the majority of the school structure that faces the south, towards the development property, is comprised of newer building additions, with the original portion of heritage school obscured from view. Being that the original school building is virtually hidden from view due to its various additions to the south, the proposed residential development at 165-167 Egerton Street will have little to no impact on the Listed cultural heritage resource at 919 Trafalgar Street.



6 Street View of school the south west portion of the school building (1952 addition) from the bottom of the property / Source: Google Maps



7 Street View from end of Cameron St towards south portion of school / Source: Google Maps

MITIGATION AND CONSERVATION

No mitigation or conservation efforts are recommended, as the proposed development is not anticipated to have any negative impacts on the Listed property at 919 Trafalgar Street.

CONCLUSION

Trafalgar Public School, located at 919 Trafalgar Street, is included in the City of London Register of Cultural Heritage Resources as a Listed property (March 26, 2007). It is listed as being built in 1923 and is in the Collegiate Gothic architectural style, including Gothic Revival details, arched doorways and windows, and gables. The current footprint is an accumulation of additions that have been built over different periods of time, including two large additions at the southeast and south of the original building that were built in 1952 and 1973 respectively.

Our evaluation of the anticipated impacts of the proposed residential infill development at 165-167 Egerton Avenue to the Listed property at 919 Trafalgar Street was informed by a review of the conceptual site plan, historical research, and a visit to the site. As a result of this research and analysis, we have come to the conclusion that the proposed site development will not have any direct or indirect impacts on the heritage attributes of Trafalgar Public School, mainly due to the physical distance to the proposed development. A buffer between the original school building and the proposed development is provided by both the newer additions to the rear and the existing playing fields to the south of the school. As well, screening is provided by the mature trees at the north west corner of the development property. As such, no mitigation or conservation efforts are necessary.

We trust that the enclosed information is satisfactory to address the submission requirements. If you have any questions regarding this assessment, or require any additional information, please do not hesitate to contact us.

Sincerely,



Ed van der Maarel
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REFERENCES

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