

30-40 Margaret Avenue Heritage Impact Assessment

Architectural Conservancy of Ontario North Waterloo Region branch

mission: to encourage the conservation and re-use of structures, districts and landscapes of architectural, historical and cultural significance through education and advocacy.



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Hello, my name is Sandra Parks and I'm speaking on behalf of the Architectural Conservancy of Ontario, North Waterloo Region branch. We encourage the conservation and re-use of structures, districts and landscapes of architectural, historical and cultural significance through education and advocacy.

Today, I'd like to share a few thoughts on the heritage impact assessment being discussed for the proposed development at 30-40 Margaret Avenue.

This is one project we must get right

Because it is such a large site and is located on one of the more highly traveled streets in the District, it has pronounced visibility with the potential to significantly enhance or detract from the overall character of the neighbourhood depending on the ultimate appearance of development on the site.



The purpose of the conservation plan is to establish a framework by which the heritage attributes of the Civic Centre Neighbourhood can be protected, managed and enhanced as the community evolves and changes over time. It will provide residents and property owners with clear guidance regarding appropriate conservation, restoration and alteration activities and assist municipal staff and council in reviewing and making decisions on permit and development applications within the district. Specific requirements to be included in the Conservation Plan,



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As the Civic Centre Neighbourhood Heritage Conservation District plan so rightly points out, because this property “is such a large site and is located on one of the more highly traveled streets in the District, it has pronounced visibility with the potential to significantly enhance **OR** detract from the overall character of the neighbourhood.” This site is not on the periphery, on Victoria Street or Weber. It’s in the middle of the District. This is one project we must get right.

The purpose of creating a Heritage Conservation District is to protect and manage the heritage character of the neighbourhood as the community evolves. The District plan provides clear guidance regarding appropriate alteration activities for those living there now **AND** for future residents, such as those who may move into this development. It’s precisely because of possible developments like this that the District was created in the first place.

Site Specific Policies – 3.3.5.3 Margaret Avenue

Policies:

- (a) New development on the east side of Margaret Avenue shall maintain the overall residential character of the neighbourhood (Section 13.1.2.4 of Municipal Plan).
- (b) Underground parking is encouraged for all forms of redevelopment and is required for apartment developments, with the exception of surface visitor parking (Section 13.1.2.4 of Municipal Plan).
- (c) Redevelopment should be of a height, siting and design which will prevent it from encroaching on lower density dwellings located on Ellen and Ahrens Streets (Section 13.1.2.4 of Municipal Plan).
- (d) Development proposals shall establish a strong, pedestrian oriented street edge that is consistent with the residential character of the District, through the use of appropriate setbacks, height, architectural features and building articulation.



Within the site-specific policies section, the District plan states: the following “are to apply to this site to ensure that new development **MAINTAINS** the heritage character of the District”:

- “new development on the north side of Margaret Avenue **SHALL** maintain the overall residential character of the neighbourhood”
- “redevelopment should be of a height, siting and design which will prevent it from encroaching on lower density dwellings”
- “development proposals **SHALL** establish a strong, pedestrian oriented street edge that is consistent with the residential character of the District, through the use of appropriate setbacks, height, architectural features and building articulation”

HIA's response to Site Specific Policies

Policy	Response	Rebuttal
maintain the overall residential character of the neighbourhood	#1 - architectural details such as stepbacks and landscape features	steep mansard roof with corner terraces is not sufficient mitigation
be of a height, siting and design which will prevent it from encroaching on lower density dwellings	#3 - third, fourth and fifth storeys are stepped back from the first and second; the sixth level is within the mansard roof which minimizes the impact of the building's height	'stepback' on the front façade from a porch, not the exterior of the second floor, and sixth mansard-storey do not adequately minimize the impact of height
establish a strong, pedestrian oriented street edge that is consistent with the residential character of the District	#4 - architectural elements such as stepbacks as well as incorporated architectural features	again, sixth mansard-storey does not establish a pedestrian oriented street edge through the use of appropriate height



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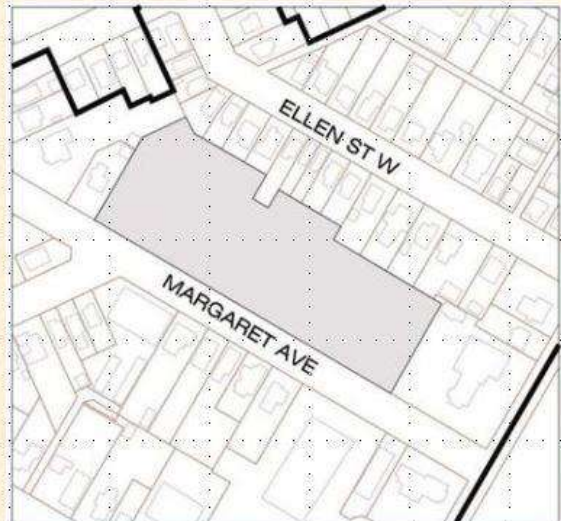
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I've prepared a chart to compare these site-specific policies with the HIA's responses. In each case, the HIA suggests proposed stepbacks are adequate to satisfy policy requirements. It proposes there are two types of stepbacks: (A) the third storey is stepped back from the second, and (B) the sixth level. The first 'stepback' on the front façade is from a porch, not from the exterior of the second floor, therefore not a stepback; and the second is a very minimal stepback in the form of a steep mansard roof with corner terraces. These do not adequately minimize the impact of height to prevent it from encroaching on lower density dwellings, nor establish a pedestrian oriented street edge through the use of appropriate height as the policies require.

Importance of Margaret Avenue site

- "large site . . . located on one of the more highly traveled streets in the District, it has pronounced visibility with the potential to significantly enhance **OR** detract from the overall character of the neighbourhood"
- **NOT** on the periphery - in the middle of the district
- "new development on the north side of Margaret Avenue **SHALL** maintain the overall residential character of the neighbourhood"
- "development proposals **SHALL** establish a strong, pedestrian oriented street edge"



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In regard to this site, we feel these policies should be **MORE CLOSELY** adhered to than is proposed in the HIA because of how important the development of this property is to the character of the District.

Site-specific guidelines are used to evaluate proposals to ensure compatibility. We've shown how the District plan singles out this site as important. To honour this importance, we feel the guidelines should also be **MORE CLOSELY** adhered to.

Site Specific Design Guidelines – 6.9.1 Margaret Avenue

- Building setbacks are encouraged for any development greater than 3-4 storeys in height to minimize the impact of new development on the pedestrian environment of the street. Setbacks should be a minimum of 2 metres to provide for useable outdoor terraces on the upper levels.

Response	Rebuttal
<p>#10 - centred three storey glass atrium . . . transition between three main building portions to the east and west transitioned with two alternate setbacks. Architectural elements such as setbacks and landscaping have also been incorporated in order to demonstrate and enforce the pedestrian orientation of the building and its relationship with Margaret Avenue. The setbacks meet the minimum requirement of 2 metres to provide useable terraces</p>	<p>floors above 3 to 4 storeys should each have a continuous 2 m setback – guidelines don't mention an angular plane of 45 degrees – two alternate setbacks = one at porch level, which is not setback, and the other is on the sixth mansard-storey with corner terraces, which are not continuous</p> <p>do not adequately minimize the impact of height on the pedestrian environment</p>



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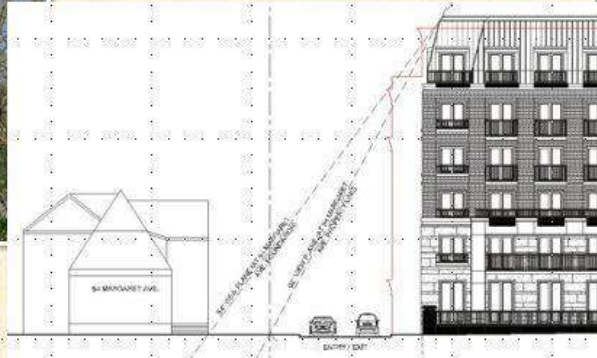
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Especially with regard to this guideline:

- “building setbacks are encouraged for any development greater than 3 to 4 storeys in height to minimize the impact of new development on the pedestrian environment of the street” – I interpret this to mean the floors above 3 to 4 storeys should each have a continuous 2 m setback from the floor below – the guidelines don't mention an angular plane of 45 degrees as the HIA suggests, just “any development greater than 3 to 4 storeys” – the HIA suggests there are two alternate setbacks, as I've outlined previously and suggested are insufficient. Therefore, I contend the development does not adequately minimize the impact of height on the pedestrian environment per this guideline.

54 Margaret Avenue – don't isolate heritage resource



- built 1904 • one of the best examples of Queen Anne Revival Style in the district

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The final point I would like to make is with regard to the property at 54 Margaret Ave. When considering the impact of new development within a District, we must take into consideration the effect on the heritage character of the District as a **WHOLE**, on the particular **STREETSCAPE** in which it is planned, and especially on **ADJACENT** buildings.

A well-established principle of built heritage conservation is the concept of **NOT** isolating a built heritage resource.

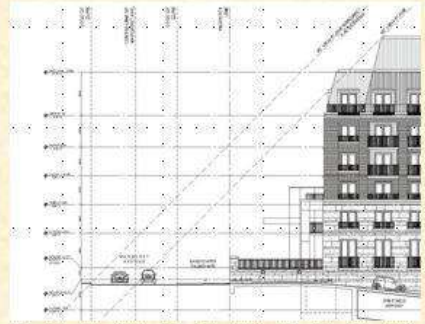
In this case, 54 Margaret is a Group A building, meaning it's one of the best examples of the heritage character of the District. We can't change the fact it's located between two new development lots. What we can do is ensure some mitigation of the impacts.

The HIA suggests the proposal will not isolate this heritage building. But the development is the width of the visitor parking driveway away from this historic home, a full five storeys in height with the very slight stepback in the sixth, mansard-storey. Stepbacks above the third floor or some other means must be used to mitigate this impact.

Identified impacts don't include height

In conclusion, this Heritage Impact Assessment has determined that the proposed development on the subject lands conforms to the policies and guidelines within the CCNHCD Plan (2007) and has limited adverse impacts on-site and to adjacent buildings. Limited adverse impacts are in the form of the removal of 67 trees on-site (only approximately ten (10) of which are part of the tree boulevard along the front property line of the subject lands), indirect or direct obstruction of views and potential land disturbances.

It fails to adequately address the impact of the height of the building, with its limited stepbacks, on the adjacent heritage homes next door **AND** across the street.



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The HIA concludes, impacts are limited to removal of trees, obstruction of views and potential land disturbances. It fails to adequately address the impact of the height of the building, with its limited stepbacks, on the **ADJACENT** heritage homes, next door and across the street.

The District plan provides clear guidance to municipal staff in reviewing development applications. We feel this is a clear case where the policies and guidelines should be most closely adhered to, on this important site in the middle of the Civic Centre.

Thank you.