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February 13, 2018

Members of the Municipal Heritage Committee  
Town of Niagara-on-the-Lake  
1593 Four Mile Creek Road  
P.O. Box 100, Virgil, ON L0S 1T0

Dear Members of the Municipal Heritage Committee:

**RE : Staff Report MHC-18-008, 144 & 176 John Street East, Randwood**

E.R.A. Architects has been retained by Save Our Randwood Estate (SORE) to review the Two Sisters hotel proposal for the Randwood Estate from a heritage perspective. As part of our review, we have been following the public process associated with the Zoning By-law Amendment and Site Plan Approval applications for the site. These comments pertain to the Staff Report currently before the Municipal Heritage Committee (Report MHC-18-008, February 13, 2018).

First and foremost, we would like to congratulate Heritage Staff on an excellent report which demonstrates a commitment to conserving Niagara-on-the-Lake's cultural heritage resources. As recognized by the Town, the community, and the Applicant's heritage consultant, the Randwood Estate is a significant heritage resource with both built and landscape elements dating back to the early nineteenth century and including work by Dunnington-Grubb, one of Canada's most important landscape architecture firms.

Operating within the framework of the Town's Official Plan, provincial policy, and best practices in heritage conservation, Heritage Staff have made a series of recommendations to steward this resource. These recommendations include: the peer-review of the Applicant's Heritage Impact Assessment, the preparation of an Ontario Regulation 9/06 assessment as the basis for a Designation By-law, and listing 588 Charlotte Street and 200 John Street on the Town's register of Heritage Resources.

We support Staff's recommendations and submit the following comments for the Committee's consideration:

**Peer-Review**

Both an independent peer reviewer (Brook McIlroy Inc.) and Parks Canada provided comments on the 2011 proposal for the same site. These comments should be addressed in the peer review of the current application and reflected in any proposal that is approved by the Town.

General comments from Brook McIlroy include:

- Consideration for siting and setbacks to create architecture that is restrained and contextually sensitive to the heritage context.
- Maximum recommended height of 3-storeys above grade for new construction.
- Use of high quality architectural materials in keeping with the period of the existing buildings.

As noted in the Staff Report, the site is adjacent to Butler's Barracks National Historic Site which includes the Commons. In its review of the 2011 proposal, Parks Canada recommended development be limited to 4 storeys with consideration for chimney and turret heights to protect the forested horizon as viewed from the Commons. Under the Provincial Policy Statement, the Municipality has a responsibility to protect adjacent resources. The peer review should address potential impacts to the Parks Canada site which is a national heritage resource and a significant tourist attraction for the Town.

We also strongly recommend that the Municipal Heritage Committee be involved the preparation of a Terms of Reference for the peer review.

Furthermore, while the subdivision is not part of the current application, it requires clarification in the context of heritage considerations for the site and should be addressed by in the peer review.

### **9/06 Assessment**

The Applicant's heritage consultant has prepared a draft Statement of Significance which should be used as the basis for the 9/06 assessment.

We note that the draft Statement of Significance identifies the boxwood hedge as an attribute which, we understand, has been decimated by the Applicant. The Applicant's actions point to the urgency of proceeding with designation. We request that the Town take immediate action to ensure further and irreparable damage to the Randwood Estate be prevented.

### **588 Charlotte Street and 200 John Street**

588 Charlotte Street and 200 John Street have a historic relationship to the Randwood Estate and their cultural heritage value and significance should be fully understood before impacts to Randwood can be properly assessed. This comprehensive assessment of the estate landscape and adjacent resources is important for evaluating impacts of the current proposal.

Additional research on Dunington-Grubb's contributions to the full extent of the Estate's landscape, including 588 Charlotte Street and 200 John Street will also be required to inform the 9/06 assessment for 144 & 176 John Street.

E.R.A. has begun its own analysis of Dunington-Grubb's contributions to the Estate landscape and can provide supporting comments if needed.

Again, we congratulate Heritage Staff on an excellent report and their commitment to conserving the Town's cultural heritage resources.

Sincerely,

A handwritten signature in black ink, appearing to be 'Michael McClelland', written in a cursive style.

Michael McClelland, Principal  
E.R.A. Architects Inc.

Copy:  
Save Our Randwood Estate (SORE)  
Lord Mayor  
Town Council Council  
Denise Horne  
Raymond Chung