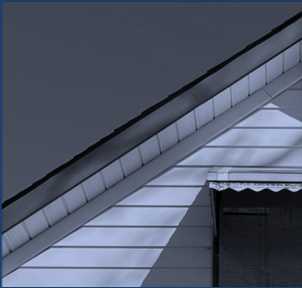




# Heritage Impact Assessment

114 Keith Street, Whitby, Ontario

Jenita Jeyan Baheerathan



September 2024

# ACKNOWLEDGEMENTS

## LAND ACKNOWLEDGEMENTS

As descendants of settlers to Canada, one of our goals is to inspire others to take action to support Indigenous communities. One of the ways we can help achieve this is through creating a meaningful and intentional land acknowledgement. Therefore, we respectfully acknowledge that the subject site and the Town of Whitby is located on the Lands of the Mississauga Nations whose communities include the Mississaugas of Scugog Island, First Nations of Alderville, Beausoleil, Curve Lake, Hiawatha, Chippewas of Georgina Island, and Rama. We are grateful to work on this land.

The Town of Whitby and the subject site is covered by three treaties. The first is the Dish with One Spoon Wampum Belt Covenant of 1701, made between the Anishinaabe Three Fires Confederacy and the Haudenosaunee Confederacy. The second is the Williams Treaties, signed on October 31 and November 15, 1923, by seven Anishinaabe First Nations and Crown representatives, addressed unsundered lands through a commission led by Treaty Commissioner A.S. Williams. The Treaties cover around 52,000 km<sup>2</sup>, from Lake Ontario's northern shore to Lake Nipissing, overlapping with earlier treaties. The third is the Johnson-Butler Purchase, also known as the "Gunshot Treaty," was made in 1788 between the Crown and certain Anishinaabe peoples. It covers land along Lake Ontario's north shore from the Toronto Purchase to the Bay of Quinte, with its boundary determined by the distance a gunshot could be heard. The land was confirmed in the Williams Treaties of 1923, and current communities in the area include Oshawa and Cobourg.

We are all treaty people. Many of us have come here as settlers, immigrants, and newcomers in this generation or generations past. We would also like to acknowledge and honour those who came here involuntarily, particularly those who are descended from those brought here through enslavement.

# BACKGROUND INFORMATION

## OWNER INFORMATION

The property municipally addressed as 114 Keith Street, Whitby (“subject site” or “site”) is presently owned by Jenita Jeyan Baheerathan.

## AUTHORS

This Heritage Impact Assessment was prepared by The Biglieri Group Ltd. (“TBG”). TBG is an urban planning, design, and heritage consulting firm based out of Toronto and Hamilton that specializes in the conservation and stewardship of cultural heritage resources across Ontario.

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Historical research and report drafting was completed by Giuseppe Ferreri, B.ES., a Junior Heritage Planner, and graduate of the University of Waterloo’s Honours Planning Program.

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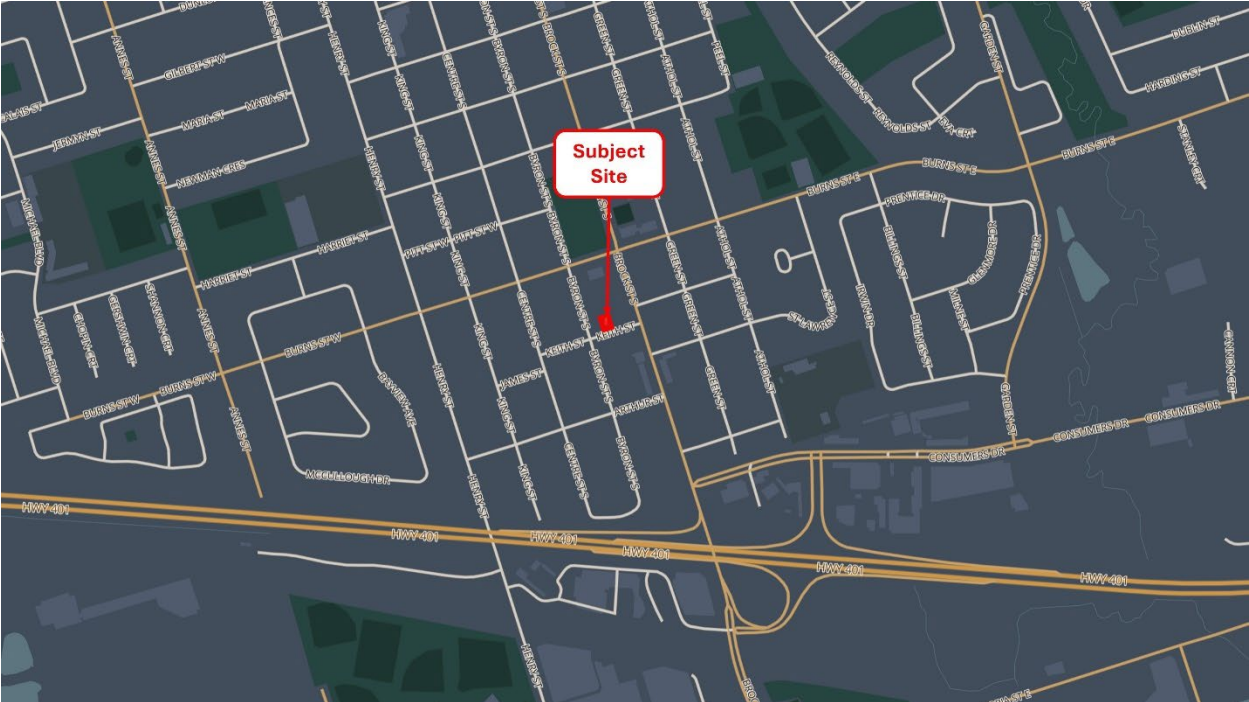
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# 1.0 INTRODUCTION

The Biglieri Group Ltd. (“TBG”) was retained by Intequa Designs, on behalf of the Owner, to prepare a Heritage Impact Assessment (“HIA”) and a Heritage Permit Application (“HPA”) for the proposed demolition of the structure at 114 Keith Street in Whitby, Ontario (the “subject site” or “site” – see Figure 1 below).

**Figure 1 - Location Map**



Source: VuMap, 2024a

The subject site is designated as a property of cultural heritage value or interest under Part V of the Ontario Heritage Act, R.S.O. 1990, Chapter O.18, through By-law No. 7297-17 (as approved / amended by the former Local Planning Appeal Tribunal on May 13, 2019) and is included on the Town of Whitby’s Municipal Heritage Register (the “Register”). This designation acknowledges the historical and cultural significance of the Werden’s Plan Neighbourhood as a whole and provides guidelines to manage physical changes in order to preserve its historic character over time.

The site currently contains a 1.5-storey dwelling with a single-storey rear addition, which has recently suffered severe fire damage and is now uninhabitable.

The purpose of this Heritage Impact Assessment (HIA) is to assess the potential impacts of the proposed demolition on the existing structure, to any adjacent heritage properties on the Town’s Register, and to the overall character of the Werden’s Plan Neighbourhood.

## 2.0 SITE AND SURROUNDINGS

### 2.1 THE PROPERTY

The subject site is located on the north side of Keith Street, between Brock Street South to the east and Byron Street South to the West, and south of Burns Street West. The major intersection nearest to the site is Burns Street West and Brock Street South. The subject site is legally described as:

*Part of Lot 27, Concession 1; Part Lot 7 East Side Of William Street Block D, Plan H50047; and Part Lot 8 East Side Of William Street Block D, Plan H50047 (Aka Byron Street) As In CO256458; Whitby.*

The site is a rectangular parcel measuring approximately 683.5 square meters (0.068 hectares), with about 22.3 meters of frontage along Keith Street and a lot depth of 30.5 meters. It features a 1.5-storey, single-detached dwelling with a vernacular front-gabled design influenced by Edwardian Classical architecture, along with a single-storey addition at the rear. The house is situated near the east side of the lot, resulting in a large side yard and, due to the size of the rear addition, a smaller backyard. Aside from the house, there are no other structures on the property. The southwest corner of the site, directly abutting Keith Street, contains a rectangular parking area that accommodates three to four vehicles. The house has been divided into rental units.

The house experienced a fire which has destroyed much of the interior but there are also clear signs of severe fire damage from the street, particularly around the front entrance and windows. In response to this damage, the house has been hoarded, with plywood boards covering the windows and doorways to prevent unauthorized access and further deterioration. A temporary fence has been erected around the property, serving as an additional security measure, indicating that the house is currently uninhabitable.

The figure below and images illustrate the subject site's aerial context within the neighbourhood and its existing conditions.



**Figure 2 - Aerial Context Map**



Source: VuMap, 2024b

*Subject Site from Keith Street Looking North (May 2024)*



Source: Original Photo



*Before Fire - Subject Site from Keith Street Looking Northwest (September 2014)*



Source: Google. 2014a

*Before Fire - Subject Site from Keith Street Looking Northeast (September 2014)*



Source: Google. 2014b



## 2.2 THE STRUCTURE

As mentioned above, the site consists of one structure: a 1.5-storey single-detached residential dwelling with a single storey rear addition that has been converted into rental unit, now damaged by fire. Based on the Werden's Plan Neighbourhood District prepared by the Town of Whitby, the existing structure (prior to the recent fire) is described as an “*early twentieth century profile, including a classically inspired front porch.*”

The dwelling includes several characteristics of an early 20th Century Edwardian architectural style including a gable roof, prominent front porch, and simple architectural details. Throughout the years, the dwelling has gone through several renovations with alterations completed to the exterior as well as the interior. As documented through aerial photographs, there was a rear addition completed prior to 2009. This rear addition was added to accommodate additional rental units within the dwelling. Additionally, interior modifications were completed to transform the original dwelling into a rental accommodation.

### South (Front) Façade



Source: Original Photo

The south (front) façade showcases the house’s vernacular front-gabled design influenced by Edwardian Classical architecture. Its most defining feature is the steeply pitched, front-facing gable, a common element in early 20th-century homes. The façade is symmetrical, reflecting the Edwardian emphasis on order and proportion. A full-width front porch supported by simple, square columns extends across the front of the house, typical of Edwardian homes, providing a transitional space between the interior and exterior. The columns, while lacking in elaborate detail, echo a classical influence through their solid and straightforward design. The exterior cladding is white horizontal composite siding, which is modern addition, and appears to be overlaid atop original wood siding also horizontally laid. Decorative details are minimal, with understated trim (painted green) around the roofline and eaves that emphasize function over ornate design, consistent with the simplicity characteristic of Edwardian architecture.

The front façade features a rectangular window on the main floor offset left of centre and a square window in the gable above, both boarded up. The entrance door, slightly off-centre to the right, is also covered with plywood.

#### West (Side) Façade



*Source: Original Photo*

The west (side) façade of the house consists of two distinct sections. The front part of the structure is the original 1.5-storey dwelling, featuring a pair of rectangular 1 by 1 windows with two smaller square windows aligned horizontally to its right. These windows remain unboarded but show signs of fire-related damage around the siding.



The rear section is a single-storey addition that has been heavily affected by fire, resulting in significant damage. Large plywood sheets cover what were likely windows and doors, indicating that they have been boarded up for safety following the fire. The siding is missing or deteriorated in several areas, exposing the concrete block foundation. A small side porch (stoop) extends to the right of the addition providing access to the house. The stoop appears to be made of a mix of concrete and stone. The visible fire damage and weathering throughout the façade give the house an appearance of abandonment.

The rear addition is unsympathetic to the original design of the house as seen on the front façade due to its flat, box-like shape that contrasts with the traditional gabled roof and more classical / symmetrical design of the main structure. It lacks any of the decorative features or architectural harmony found in the main structure, using simple horizontal siding and a flat roofline that disrupts the cohesive aesthetic of the original house. This stark difference in style and design makes the rear addition appear as a more recent, functional extension rather than an integrated part of the house's architectural heritage.

#### North (Rear) Façade



*Source: Original Photo*

The north (rear) façade of the house features the single-storey addition showing signs of extensive fire damage. The upper part of the wall, including the eaves and roofline, displays visible charring and blackened marks consistent with fire exposure. Two large windows are present, both boarded up with plywood, indicating either damage from the fire or efforts to

secure the structure post-fire. The siding is horizontal and appears relatively intact, except for some discoloration and soot marks near the roof. The foundation is made of concrete blocks with small vent openings, indicating the presence of a crawl space. It is unclear if these holes in the block wall are intentional as part of the architecture or as a result of fire suppression efforts. Overall, the rear façade shows clear indications of fire damage, particularly in the upper portion, while the lower section seems structurally sound but weathered. Again, the rear addition can be seen here as unsympathetic to the original design of the house as seen on the front façade due to its flat, box-like shape that contrasts with the traditional gabled roof and more classical / symmetrical design of the main structure.

### East (Side) Façade



Source: Original Photo

The east (side) façade of the house also showcases the two distinct sections: the original 1.5-storey portion at the front and a 1-storey addition at the rear. The original portion of the house has a gabled roof and features taller, narrower windows that are now boarded up. The siding here is horizontal, painted white, and sits above a foundation of mixed materials (i.e., concrete, concrete block, and a masonry wall clad with veneered fieldstone), providing a more textured and traditional appearance. The entryway, accessed via concrete steps with metal railings and stone veneers, is part of this section, reflecting its more detailed architectural design. In contrast, the rear 1-storey addition has a flat roofline that differs significantly from the pitched roof of the original house. This addition's façade is simpler and less detailed, with a concrete block foundation rather than the stone cladding of the original section. The windows on this addition are smaller, rectangular, and also boarded up. The material changes from stone to concrete, along with the differing rooflines and window sizes,



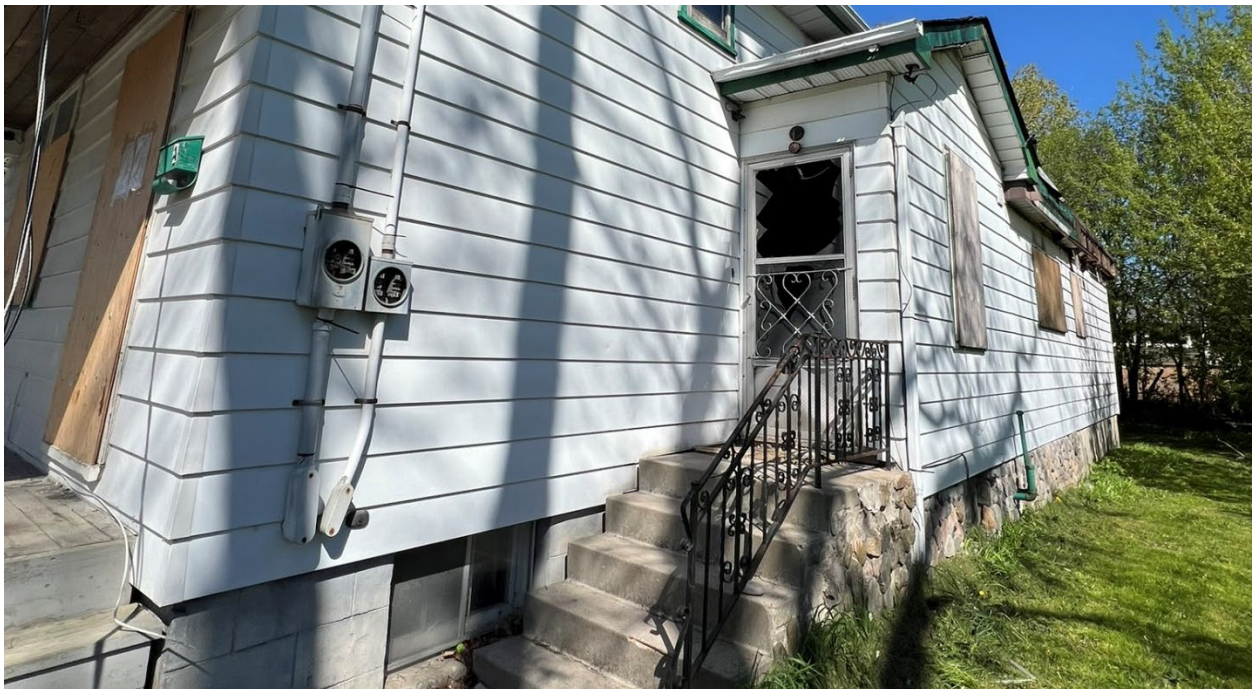
highlights the alterations over the years and the addition as a later, more utilitarian structure that contrasts with the style of the original house.

East (Side) Façade



Source: Original Photo

East (Side) Façade



Source: Original Photo

There is also a red brick chimney centrally positioned on the original 1.5-storey section visible from this side. Its simple, rectangular design lacks decorative details, indicating a functional purpose. The bricks appear weathered.

### Interior

The interior of the house has been severely damaged by fire, with the extent of destruction making it difficult to fully discern the original layout. In the kitchen area, the ceiling has partially collapsed, exposing charred beams and insulation, while the cabinets and walls are heavily scorched and covered in soot. This area shows significant damage, suggesting that the fire either started or spread intensely here. In another part of the house, the floor has completely caved in, exposing the subfloor and burnt beams, indicating the fire's likely impact on the structural integrity. The staircase and surrounding hallway show intense smoke and heat damage, with peeling paint and charred wood, yet the basic structure remains standing.

Other parts of the house, however, are more precarious, with walls partially collapsed and debris scattered across the floors. The bathroom, for example, shows significant heat damage with burn marks on the bathtub and tiles, while the surrounding flooring and walls appear dangerously compromised.

The photos below were taken with great caution, as weakened floors and collapsed sections rendered some areas inaccessible due to the ongoing risk of further structural failure. The conditions in these images make it clear that navigating the house was hazardous, and many parts could not be fully explored due to the instability caused by the fire. In places, the floor was completely burnt out exposing the level below.

The images below reveal that the rear addition of the house has been entirely destroyed, with no remaining layout remaining. The fire completely ravaged this section, leaving behind collapsed walls, exposed framing, and a floor that is no longer intact. The destruction is so severe that this area could not be safely explored, as any remaining structures appeared unstable and at high risk of further collapse.

The total destruction of the rear addition indicates that the fire may have burned most intensely here, leaving nothing but charred remnants and debris, making it impossible to access or assess without considerable danger.



*Kitchen and Fire Damage (Original Section)*



*Kitchen and Fire Damage (Original Section)*



*Room and Fire Damage (Original Section)*



*Burnt Through Floor (Original Section)*



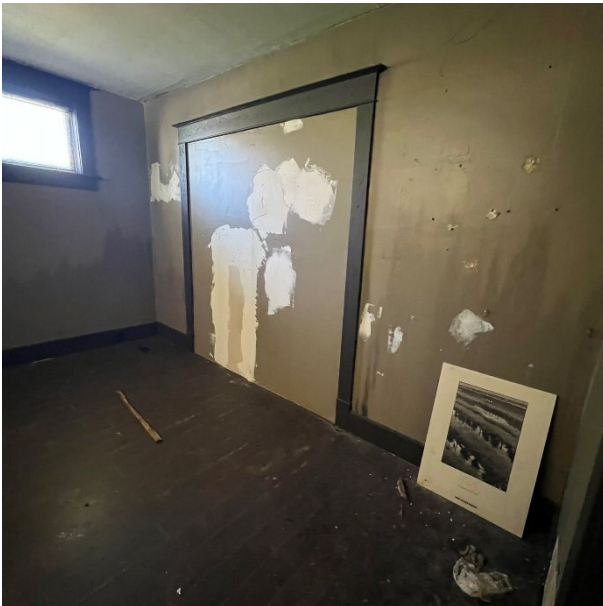
*Main Floor Entrance and Landing (Original Section)*



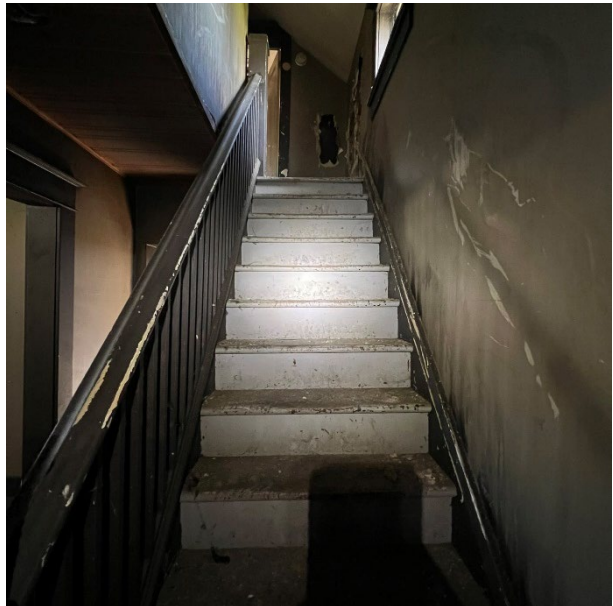
*Room and Fire Damage (Original Section)*



*Room and Fire / Fire Suppression Damage (Original Section)*



*Original Section Staircase*





*Upper-Level Room with Fire / Fire  
Suppression Damage (Original Section)*



*Upper-Level Room with Fire / Fire  
Suppression Damage (Original Section)*



*Upper-Level Room with Fire / Fire  
Suppression Damage (Original Section)*



*Upper-Level Room with Fire / Fire  
Suppression Damage (Original Section)*





*Upper-Level Room with Fire / Fire Suppression Damage (Original Section)*



*Upper-Level Room with Fire / Fire Suppression Damage (Original Section)*



*Upper-Level Room with Fire / Fire Suppression Damage (Original Section)*



*Upper-Level View of Addition*





*Upper-Level Room with Fire / Fire Suppression Damage (Original Section)*



*Upper-Level Bathroom with Fire / Fire Suppression Damage (Original Section)*



*Upper-Level Bathroom with Fire / Fire Suppression Damage (Original Section)*

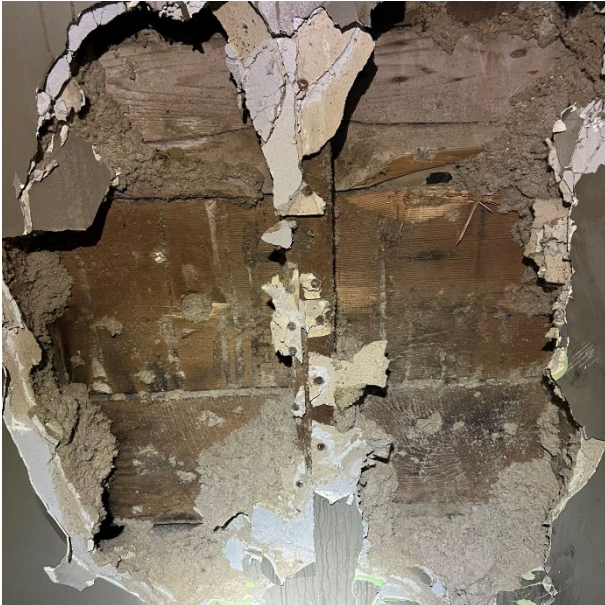


*Upper-Level Bathroom with Fire / Fire Suppression Damage (Original Section)*





*Upper-Level Exposed Lathe and Plaster  
(Original Section)*



*Upper-Level Bathroom with Fire / Fire  
Suppression Damage (Original Section)*



*Rear Addition with Total Fire Destruction*



*Rear Addition with Total Fire Destruction*





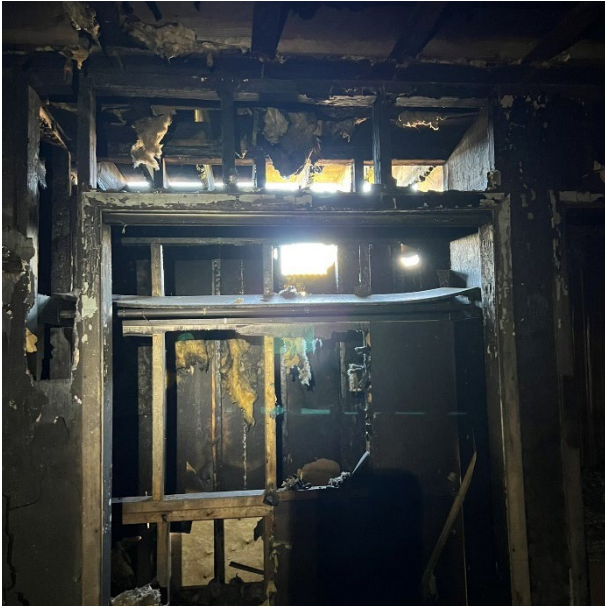
*Rear Addition with Total Fire Destruction*



*Rear Addition with Total Fire Destruction*



*Rear Addition with Total Fire Destruction*



*Rear Addition with Total Fire Destruction*





*Burnt Through Floor (Basement Visible Below)*



*Burnt Through Walls and Structural Elements*



*Stairwell to Basement*



*Electrical Panel (Basement)*





*Basement with Fire / Fire Suppression  
Damage*



*Basement with Fire / Fire Suppression  
Damage*



*Basement with Fire / Fire Suppression  
Damage*



*Basement with Fire / Fire Suppression  
Damage (Ceiling Collapse)*





*Closed Basement Entrance to Yard*



*Damaged Basement Bathroom*



Other Damage

*Cladding Destruction*



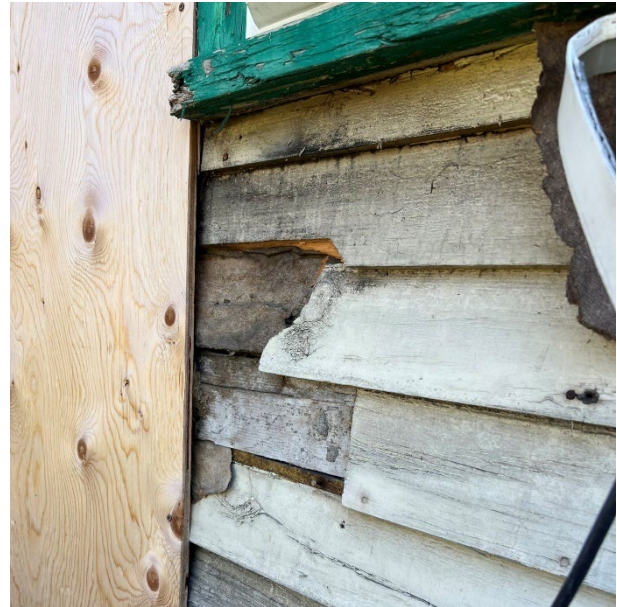
*Exposed Original Wood Siding*



*Exposed Original Wood Siding*



*Exposed Original Wood Siding*



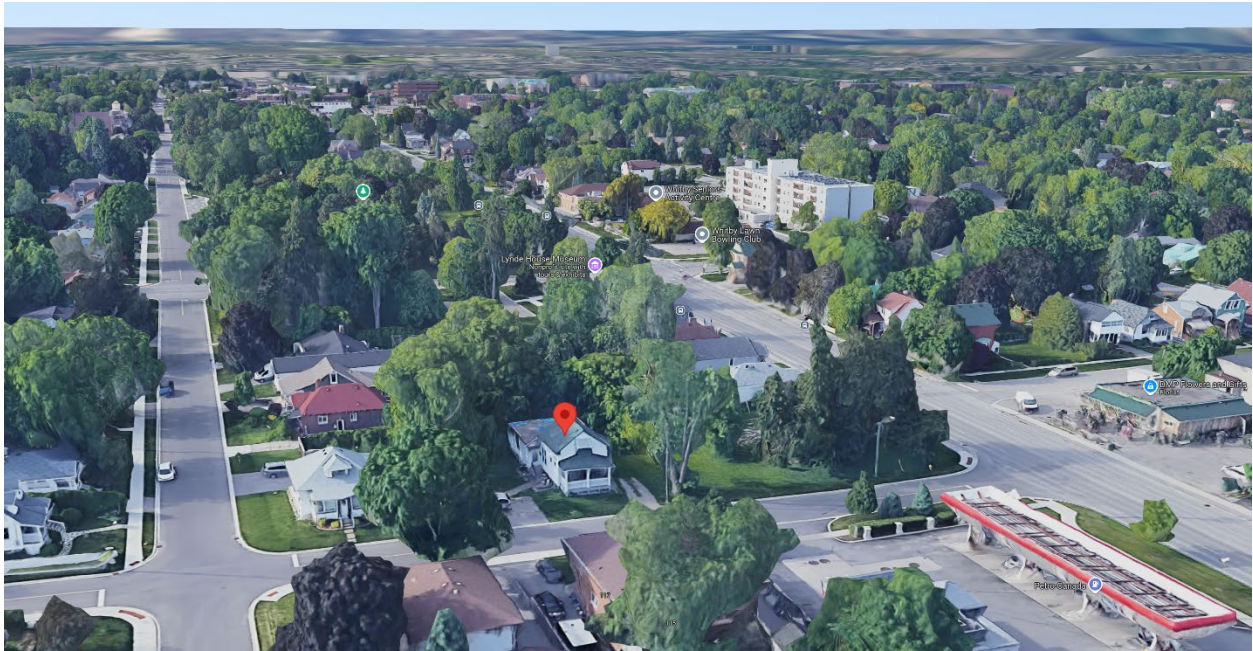
## **2.3 ADJACENT AND SURROUNDING**

The subject site is located in a predominantly residential area with detached homes to the north, west, and directly adjacent to the south. Across the street to the south, the context also includes a 2-storey walk-up apartment, adding a slightly higher-density residential character to the immediate surroundings. To the east, across Brock Street, the area transitions into a commercial strip, featuring a mix of small businesses. Notably, to the southeast, there is a gas station along with other commercial uses, indicating a more active, mixed-use corridor in contrast to the quieter residential setting around the subject property.

Further to the southeast along Brock Street, a variety of commercial establishments can be found, including professional offices, cafes, healthcare services, and specialty stores, indicating a diverse mix of small businesses. Continuing east, northeast, there are additional small businesses and service centers such as auto-related shops and florists. Further to the northeast, there is even a 5-storey apartment building at 850 Green Street. This blend of uses contributes to a dynamic urban edge along Brock Street, while the surrounding residential areas maintain a quieter suburban character.



**Figure 3 - 3D Aerial View of Lands North of Site (Site Indicated with Red Icon)**



Source: Google, 2024a

**Figure 4 - 3D Aerial View of Lands East of Site (Site Indicated with Red Icon)**



Source: Google, 2024b



**Figure 5 - 3D Aerial View of Lands South of Site (Site Indicated with Red Icon)**



Source: Google, 2024c

**Figure 6 - 3D Aerial View of Lands West of Site (Site Indicated with Red Icon)**



Source: Google, 2024d

## 2.4 HERITAGE CONTEXT

The subject site is a designated property of cultural heritage value or interest within Werden's Plan Neighbourhood Heritage Conservation District ("WPN-HCD") and is located at the southeast corner and edge of the WPN-HCD boundaries (see Figure 7 below). In the Register, the *Inventory of Part V Designated Properties – Werden's Plan Neighbourhood Heritage Conservation District*, classifies the subject site as a "Historic" resource.

The word "adjacent" is not a defined term in the Town of Whitby's Official Plan, therefore, it is assumed that the common definition for adjacent, meaning next to or adjoining is appropriate. Accordingly, there are four properties located adjacent to the subject site and two properties located across the street from the site, which in some municipalities is considered adjacent. These properties are 922 Brock Street South, 924 Brock Street South, 925 Byron Street South, 122 Keith Street, 119 Keith Street, 115-117 Keith Street, and 1006 Brock Street South. Of these adjacent properties, only 925 Byron Street South and 122 Keith Street have heritage status, with both being Part V designated properties classified as "Complementary" and "Historic" resources, respectively. Generally, everything to the west, northwest, and north of the site is designated by default as part of the WPN-HCD under Part V of the Ontario Heritage Act.

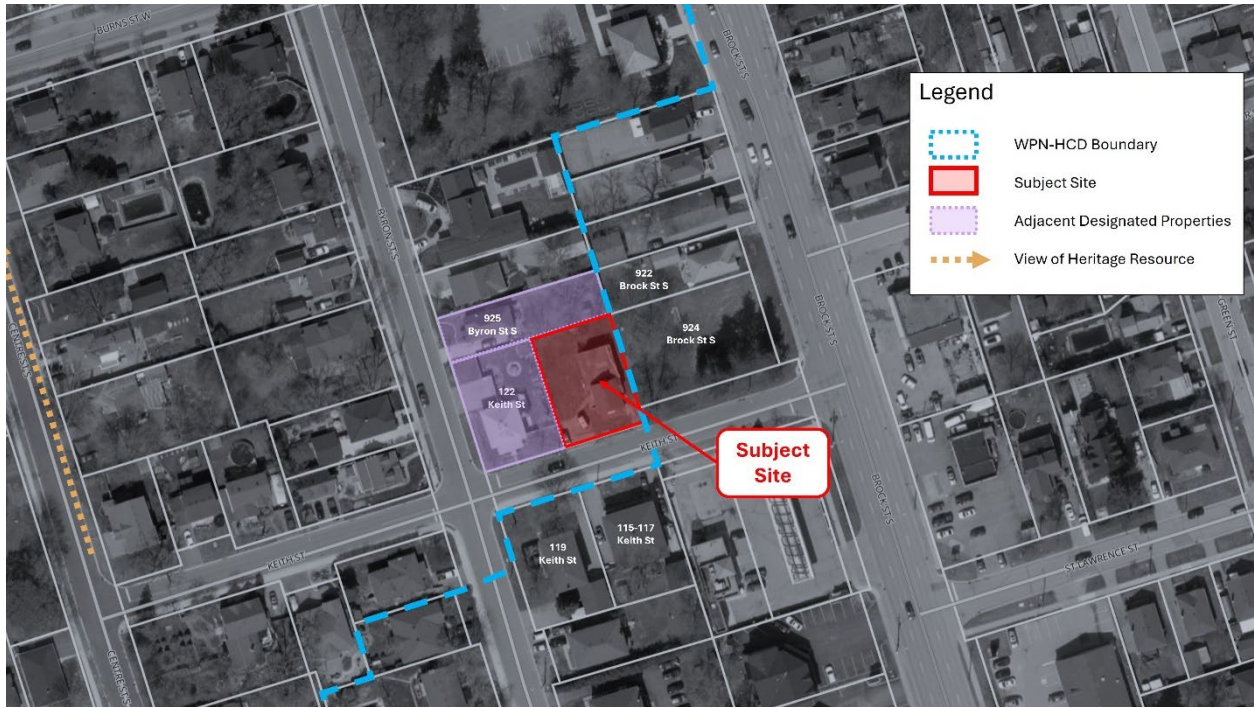
**Figure 7 - Werden's Plan Neighbourhood Heritage Conservation District**



Source: Town of Whitby, 2017a



**Figure 8 - Adjacent Heritage Context Map**



VuMap, 2024b

## 3.0 PROPOSAL

This Heritage Permit Application is proposing the demolition of the existing dwelling at 114 Keith Street. No other development is proposed at this time.

# 4.0 POLICY CONTEXT

## 4.1 Planning Act

The Planning Act, R.S.O. 1990, c. P.13 (the “Planning Act”) is provincial legislation that sets out the ground rules for land use planning in Ontario. It describes how land uses may be controlled, and who may control them. The Planning Act includes several sections that speak to matters relating to cultural heritage, including those matters of provincial interest in Section 2, which among other matters, states that:

*2 The Minister, the council of a municipality, a local board, a planning board, and the Tribunal, in carrying out their responsibilities under this Act, shall have regard to, among other matters, matters of provincial interest such as,*

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

To refine the matters of provincial interest described in Section 2 of the Planning Act, the Minister of Municipal Affairs and Housing, or the Minister together with any other minister of the Crown, issues policy statements on matters relating to municipal planning that are of provincial interest. In this regard, the in-force 2020 Provincial Policy Statement was prepared, which sets the rules for land use planning in Ontario.

## 4.2 Provincial Policy Statement

The 2020 Provincial Policy Statement (“PPS”), which is still in force and effect until October 20, 2024, includes policies about managing growth, using, and managing natural resources, protecting the environment, public health, and safety, and provides policy direction on matters of provincial interest including the wise use and management of cultural heritage resources.

Section 2.6 of the PPS provides specific policy direction with respect to cultural heritage and archaeology. Specifically, Policy 2.6.1 states that significant built heritage resources and significant cultural heritage landscapes shall be conserved.

This HIA assesses the proposed demolition to determine any potential impacts to heritage attributes and adjacent heritage properties on the Town’s Register and suggest mitigation/conservation measures. This includes an assessment of alternative development options, if necessary.

### **4.3 Provincial Planning Statement, 2024**

On August 20, 2024, the Ministry of Municipal Affairs and Housing (“MMAH”) released a new Provincial Planning Statement (“2024 PPS”). The 2024 PPS is intended to be a streamlined land use policy framework that replaces the Provincial Policy Statement 2020 and the Growth Plan for the Greater Golden Horseshoe 2019. It builds on housing-supportive policies from both documents and provides municipalities with the tools and flexibility to increase housing supply, align development with infrastructure for a competitive economy, support rural viability, and protect agricultural lands, the environment, and public health and safety.

The 2024 PPS comes into force and effect on October 20, 2024, and therefore, the policies within it, have been included in this report, as a way to highlight the new provincial policy directions as it relates to cultural heritage.

In this regard, Section 4 of the 2024 PPS provides policy direction on the wise use and management of resources in Ontario, including cultural heritage and archaeological resources. Section 4.6 specifically provides policy direction on cultural heritage and archaeology, providing the following policies:

1. Protected heritage property, which may contain built heritage resources or cultural heritage landscapes, shall be conserved.
2. Planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the significant archaeological resources have been conserved.
3. Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property unless the heritage attributes of the protected heritage property will be conserved.
4. Planning authorities are encouraged to develop and implement:
  - a. archaeological management plans for conserving archaeological resources; and
  - b. proactive strategies for conserving significant built heritage resources and cultural heritage landscapes.

5. Planning authorities shall engage early with Indigenous communities and ensure their interests are considered when identifying, protecting, and managing archaeological resources, built heritage resources and cultural heritage landscapes.

A protected heritage property is a defined term in the 2024 PPS, and means property designated under Part IV or VI of the Ontario Heritage Act; property included in an area designated as a heritage conservation district under Part V of the Ontario Heritage Act; property subject to a heritage conservation easement or covenant under Part II or IV of the Ontario Heritage Act; property identified by a provincial ministry or a prescribed public body as a property having cultural heritage value or interest under the Standards and Guidelines for the Conservation of Provincial Heritage Properties; property protected under federal heritage legislation; and UNESCO World Heritage Sites.

Significant heritage resource is also a defined term in the 2024 PPS and 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.

Accordingly, the policies of 4.6.1, 4.6.3, and 4.6.4 apply to the proposal, and therefore, have been captured in this report. The focus for heritage conservation in Ontario, as per the 2024 PPS, has now shifted to conserving protected heritage properties (such as the subject site), which means properties listed or inventoried but not designated are not provincial priorities for conservation.

The 2024 PPS is not yet in force and effect, and this section was provided for reference only to the emerging new planning framework. This HIA assesses the proposed demolition to determine any potential impacts to the site as a protected heritage property and adjacent protected heritage properties on the Town's Register and suggests mitigation/conservation measures. This includes an assessment of alternative development options, if necessary.

#### **4.4 Ontario Heritage Act**

The Ontario Heritage Act, R.S.O. 1990, c. O.18 (the "OHA"), is provincial legislation that sets out the ground rules specifically for the protection of heritage properties and archaeological sites in Ontario. The OHA came into force in 1975, and has been amended several times, including in 2005 to strengthen and improve heritage protections in Ontario, amended again in recent years through several bills including Bill 108 in July 2021, in November 2022 through Bill 23, in December 2023 through Bill 139, and in 2024 through Bill 200.

Under the OHA, Part V, Section 39.1 to 46 provide the legislation for heritage conservation districts.

Section 42 of the OHA provides that, in a designated heritage conservation district, property owners must obtain a municipal permit before altering, erecting, demolishing, or removing

any building or structure on their property. This excludes the building's interior. However, minor alterations that are allowed in the district's conservation plan can be made without a permit. Accordingly, property owners in a designated heritage conservation district can apply for a permit to alter, erect, or demolish parts of their property. The application must include information required by the municipality, which will acknowledge receipt and decide within 90 days, either approving, refusing, or attaching conditions to the permit. If no decision is made within this timeframe, the permit is deemed granted. Owners can appeal a refusal or conditional approval to the Tribunal.

## 4.5 Ontario Heritage Tool Kit

The Ontario Heritage Tool Kit (“OHTK”) is a series of guides designed to help understand the heritage conservation process in Ontario. The OHTK guides explain the steps to undertake the identification and conservation of heritage properties using the Ontario Heritage Act. They also describe roles community members can play in municipal heritage conservation, as participants on municipal heritage committees, or through local research conducted by groups with an understanding of heritage.

Following recent amendments to the Heritage Act, the OHTK was updated to assist users understand the changes. Some changes to the Heritage Act came into effect as O. Reg. 385/21 on July 1, 2021, but the OHTK drafts dated May 2021 were never finalized. Notwithstanding, the May 2021 draft of the OHTK are still posted on the Environmental Registry of Ontario (ERO # 019-2770), and as such, are helpful in understanding the revisions being considered by the Province.

The original OHTK consist of five documents. The document entitled “Heritage Resources In The Land Use Planning Process” and specifically Info Sheet #5: Heritage Impact Assessments and Conservation Plans are the most applicable to this HIA and set out the high-level types of negative impacts to be considered. These negative impacts include, but are not limited to:

1. **Destruction** of any, or part of any, significant heritage attributes or features;
2. **Alteration** that is not sympathetic, or is incompatible, with the historic fabric and appearance;
3. **Shadows** created that alter the appearance of a heritage attribute or change the viability of a natural feature or plantings, such as a garden;
4. **Isolation** of a heritage attribute from its surrounding environment, context, or a significant relationship;
5. **Direct or indirect obstruction of significant views or vistas** within, from, or of built and natural features;



6. **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; and
7. **Land disturbances** such as a change in grade that alters soils, and drainage patterns that adversely affect an archaeological resource.

The May 2018 draft OHTK document entitled, “Designating Heritage Properties” is also relevant to this HIA as it describes what a designation is and how it works to protect cultural heritage properties, and how a designation can work to conserve the heritage value of a property by managing alterations and supporting ongoing maintenance and conservation, among other matters.

Under the Heritage Act, O. Reg. 9/06 sets out the criteria for determining cultural heritage value or interest. Under O. Reg 9/06, a property may be designated under Section 29 of the Heritage Act if it meets two or more of the criteria for determining whether it is of cultural heritage value or interest. However, O. Reg 9/06 does not consider matters that relate to the heritage integrity of building or structures.

Although a heritage evaluation under O.Reg 9/06 is not a component of this report, Section 5.3 of the OHTK document “Heritage Property Evaluation” provides valuable insight related the discussion of “integrity”. Accordingly, a heritage property does not need to be in original condition, since few survive without alterations between their date of origin and today.

Integrity then, becomes a question of whether the surviving physical features (heritage attributes) continue to represent or support the cultural heritage value or interest of the property.

In this regard, buildings that have been irreversibly altered without consideration for design, may not be worthy of long-term protection. When surviving features no longer represent the design, the integrity has been lost. Similarly, removal of historically significant materials, or extensive reworking of the original craftsmanship, warrants an assessment of integrity. If a building has an association with a prominent owner, or if a celebrated event took place there, it may hold cultural heritage value or interest, but the challenge comes with defining the specific type of association.

Cultural heritage value or interest may also be intertwined with location or an association with another structure or environment. If these have been removed, the integrity of the property may be seriously diminished. As well, cultural heritage value or interest can be found in the evolution of a heritage property, as much can be learned about social, economic, technological, and other trends over time. The challenge again, is being able to differentiate between alterations that are part of an historic evolution, and those that are expedient and offer no informational value.

Section 5 of the May 2021 Draft OHTK document “Designating Heritage Properties” also provides draft guidance on conserving the heritage value of a designated property. The guidance provided in this section is helpful, as it speaks to matters regarding the loss of heritage integrity.

Accordingly, if a property is noted as being important for its architectural design or original details, and that design has been irreparably changed, it loses its heritage value and its integrity. Likewise, if a property is designated for its association with a significant person or event, but the physical evidence from that period has disappeared, the property’s cultural heritage value is diminished. For example:

*What a difference it makes to see the symbols and hideaway places associated with the Underground Railroad in a building, compared with only the ability to say, “this happened here.”*

As well, the same consideration applies to contextual qualities. A building, structure or other feature that has lost its context, has lost an important part of its heritage value.

## **4.6 A Place To Grow: Growth Plan For The Greater Golden Horseshoe**

A Place to Grow: The Growth Plan for the Greater Golden Horseshoe, 2019 (the “Growth Plan”) came into effect as of May 16, 2019, replacing the previous 2017 Growth Plan. All decisions made on or after May 16, 2019 in respect of the exercise of any authority that affects a planning matter must conform with the Growth Plan, subject to any legislative or regulatory provisions providing otherwise.

Subsequently, on August 28, 2020, the Growth Plan was amended by Growth Plan Amendment No. 1. The Growth Plan provides a framework for implementing the Province’s vision for managing growth across the Greater Golden Horseshoe (GGH) to the year 2051 and supports the achievement of complete communities.

The subject lands are located within the GGH, and therefore, the policies of the Growth Plan apply. It is noted that once the 2024 PPS comes into force and effect on October 20, 2024, the Growth Plan will be repealed.

The Guiding Principles, which are important for the successful realization of the Growth Plan, are set out in Section 1.2.1. The key principle relevant to the proposal includes conserving and promoting cultural heritage resources to support the social, economic, and cultural well-being of all communities, including First Nations and Métis communities.



In this regard, Section 4.2.7 of the Growth Plan sets out the policy framework for cultural heritage resources within the GGH. Specifically, Policy 4.2.7.1 states that *cultural heritage resources will be conserved in order to foster a sense of place and benefit communities, particularly in strategic growth areas.*

This Growth Plan policy will be considered in the context of this report through the assessment below.

## **4.7 Envision Durham (Durham Region Official Plan)**

The Regional Municipality of Durham adopted their new Regional Official Plan (“New DROP”) on May 17, 2023, which is the culmination of work completed through Envision Durham, the Municipal Comprehensive Review (MCR) process. The New DROP addresses a wide variety of strategic land use planning and development matters. Envision Durham also represents the Region’s provincially mandated exercise to ensure that the New DROP conforms with Provincial Plans or does not conflict with them; has regard to matters of Provincial interest; and is consistent with the Provincial Policy Statement.

On September 3, 2024, the Minister of Municipal Affairs and Housing approved Envision Durham, in part, with modifications. All of Whitby is included within this approval. Details on the approval of the new Regional Official Plan are available on the Environmental Registry of Ontario

The New DROP has a much more robust policy section on cultural heritage. Though not directly a cultural heritage policy, Section 3.2 of the New DROP provides policy direction with respect to climate change and sustainability. Section 3.2.10.c) speaks to promoting the use of sustainable design principles and green building design in the planning and construction of buildings, including adaptive reuse, and energy efficient building materials and designs. Similarly, Section 3.3 speaks to the creation of complete communities, with one of the objectives being the support for the adaptive reuse of cultural heritage sites and properties.

Generally, the Region prioritizes the recognition, conservation, and enhancement of cultural heritage in the region, including resources and landscapes, such as downtowns, historical areas, scenic lookout areas, archaeological sites or natural elements that are valued together for their interrelationship, meaning or association with the community. Objectives in this regard include: supporting the preservation of heritage and character within the region’s historic downtowns, streetscapes and neighbourhoods; promoting the conservation, protection and enhancement of Durham’s built and cultural heritage resources and landscapes, including Indigenous cultural heritage; promoting a balanced approach to intensification in downtowns where appropriate, while preserving built and cultural heritage value; supporting the adaptive reuse of cultural heritage sites and properties.

Policy 3.3.33 of the New DROP provides it is the policy of Council to strengthen, restore and enhance the local, historical and cultural heritage, character and role of Durham's downtowns and historical areas as walkable centres of tourism, recreation, housing, employment, main street shopping and social gathering to foster cultural capital and a creative economy. Policy 3.3.41 encourages area municipalities to adopt measures that protect and enhance cultural heritage resources. This includes incorporating heritage protection policies in official plans, using the Ontario Heritage Act to conserve heritage resources, establishing Municipal Heritage Committees for consultation during planning processes, regularly updating heritage registers, creating urban design standards in historic districts, and maintaining a list of cultural heritage landscape features with policies to protect and enhance them across the region.

Accordingly, these policies will be considered in the context of this report through the assessment below.

## **4.8 Town of Whitby Official Plan**

The Town of Whitby Official Plan, as amended ("OP") sets policy directions for land use planning matters regarding long-term growth and development in the municipality. The OP provides policies and directives for the overall management of growth, maintenance of the existing community, and sustaining the natural and cultural heritage environments.

In this regard, general goals and objectives related to cultural heritage are set out in Policy 2.3.4.2.4 and 2.3.4.2.5(g) the Town's goal is to protect and preserve the municipality's cultural heritage for future generations while fostering a sense of civic identity. This will be achieved by maintaining a high standard of community design in all future development and redevelopment, ensuring new projects are sensitively integrated with existing structures, including cultural heritage resources.

Accordingly, Section 6 of the OP provides the specific policy direction with respect to cultural heritage resources and archaeological resources in the Town. In this section, the specific objectives are to identify, conserve, and enhance cultural heritage resources in accordance with the Ontario Heritage Act, ensuring these resources are protected during the development approval process in compliance with relevant legislation, plans, programs, and guidelines. Additionally, they aim to conserve and enhance the character of Heritage Conservation Districts by carefully considering any proposed changes within or adjacent to the district.

### **Cultural Heritage Resources**



The OP defines Cultural Heritage Resources as resources that have been determined to have cultural heritage value or interest for the important contribution they make to our understanding of the history of a place, event, or a people and include built heritage, cultural heritage landscapes, archaeological resources, and documentary heritage left by people.

Policy 6.1.3.1 provides that the Municipality shall protect and conserve cultural heritage resources in accordance with applicable legislation, policies, and recognized heritage protocols. In this regard, Policy 6.1.3.4 states that:

*The Municipality, in consultation with the municipal heritage committee, shall encourage the designation and retention of cultural heritage resources on the original site and that such resources be integrated into new development and redevelopment, where appropriate, through the development approval process and other appropriate mechanisms. Retention of façades alone will generally be discouraged.*

Notwithstanding, Policy 6.1.3.6 provides that Council shall not restrict the right of the owner to alter a property designated under the Ontario Heritage Act, provided that the necessary permits are obtained, the alterations maintain the integrity of the property's cultural heritage values and attributes, and the alterations conform to the policies of this Plan, any applicable Heritage Conservation District Plan, designating by-law, and the Zoning By-law. Similarly, Policy 6.1.3.7 goes on to say that, in reviewing proposals for construction, demolition, relocation, removal, alterations, additions, renovation, or restoration of buildings or structures within a designated Heritage Conservation District, the Town shall be guided by the applicable Heritage Conservation District Plan guidelines and policies. The WPN-HCD Plan is discussed in the next section of this report.

Should any of these proposals be submitted, Policies 6.1.3.8 and 6.1.3.9 state that the Town may require a cultural heritage impact assessment that details the cultural heritage resource, assesses potential impacts of development, and suggests strategies to mitigate negative effects when alterations, development, or redevelopment are proposed on or adjacent to properties designated under Part IV or Part V of the Ontario Heritage Act. Additionally, a cultural heritage impact assessment may be required for the removal of a property from the Heritage Register or the demolition of part or all of a building or structure on a property listed on the Heritage Register. This HIA has been prepared in response to Policy 6.1.3.9 of the OP.

The Town may also impose, as a condition of any development approvals, the implementation of appropriate conservation, restoration, or mitigation measures to ensure the conservation of any affected cultural heritage resources (Policy 6.1.3.10).

With respect to proposed demolitions, Policy 6.1.3.11 states that “where cultural heritage resources cannot be retained, they shall be documented and are encouraged to be commemorated where appropriate.” This HIA can be utilized as an appropriate form of documentation. In addition, a structural assessment has been submitted as part of the complete HPA, and recommends that the house on site (i.e., the cultural heritage resource) as it cannot be retained.

#### **4.9 Werden’s Plan Neighbourhood Heritage Conservation District (By-Law No. 7297-17)**

The Werden’s Plan Neighbourhood Heritage Conservation District (“WPN-HCD”) is an agreement between the Town of Whitby and property owners in the Werden’s Plan Neighbourhood to preserve its historic small-town character. It guides long-term management of physical changes in the neighbourhood, covering public works and certain private property alterations requiring heritage review. It outlines which changes need review and those exempted, excluding most interior alterations. The WPN-HCD was designated under Part V of the Ontario Heritage Act through By-law No. 7297-17 (as approved / amended by the former Local Planning Appeal Tribunal on May 13, 2019) and is included on the Town of Whitby’s Municipal Heritage Register (the “Register”).

Proposals for demolition, alterations, and new construction are evaluated based on the plan’s guidelines. While property owners are not required to restore buildings, the plan supports those interested in doing so. Redevelopment is allowed but limited to specific types of construction, ensuring preservation and enhancement of the historic character.

The WPN-HCD covers the western part of Asa Werden's 1854 subdivision and parts of the Radenhurst and Wallace Plans, reflecting Whitby’s early growth (see Figure 9 below). It spans from Colborne Street West in the north to a historic cottage on James Street in the south, and from Brock Street South in the east to Henry Street in the west. The district includes 250 properties with historic residential streetscapes and key landmarks like St. Mark’s United Church, the Ontario County Courthouse, and the Whitby Central Library. The district preserves the area’s historic character while recognizing its significance in Whitby’s development.

In Werden’s Plan Neighbourhood, planning matters such as zoning and land subdivision will align with the Heritage Conservation District Plan. If there is a conflict between the WPN-HCD Plan and other planning documents, the WPN-HCD Plan takes precedence. In cases of



conflict with municipal by-laws, the WPN-HCD Plan will prevail, but the by-law remains valid in other respects to the extent of the conflict.

Within the WPN-HCD, the subject site is classified as a “Historic” property with the date of construction being unknown in the Register, and the house being un-named. “Historic properties are one of three classes created to describe the relative significance of property in the neighbourhood. This class of property includes those developed when Whitby was a stable small town, before its expansion in the mid-twentieth century. It excludes those properties built during the historic period, but which have been greatly or irreversibly altered. The other two classes of properties in the WPN-HCD are “Complementary” properties and “Uncharacteristic” properties.

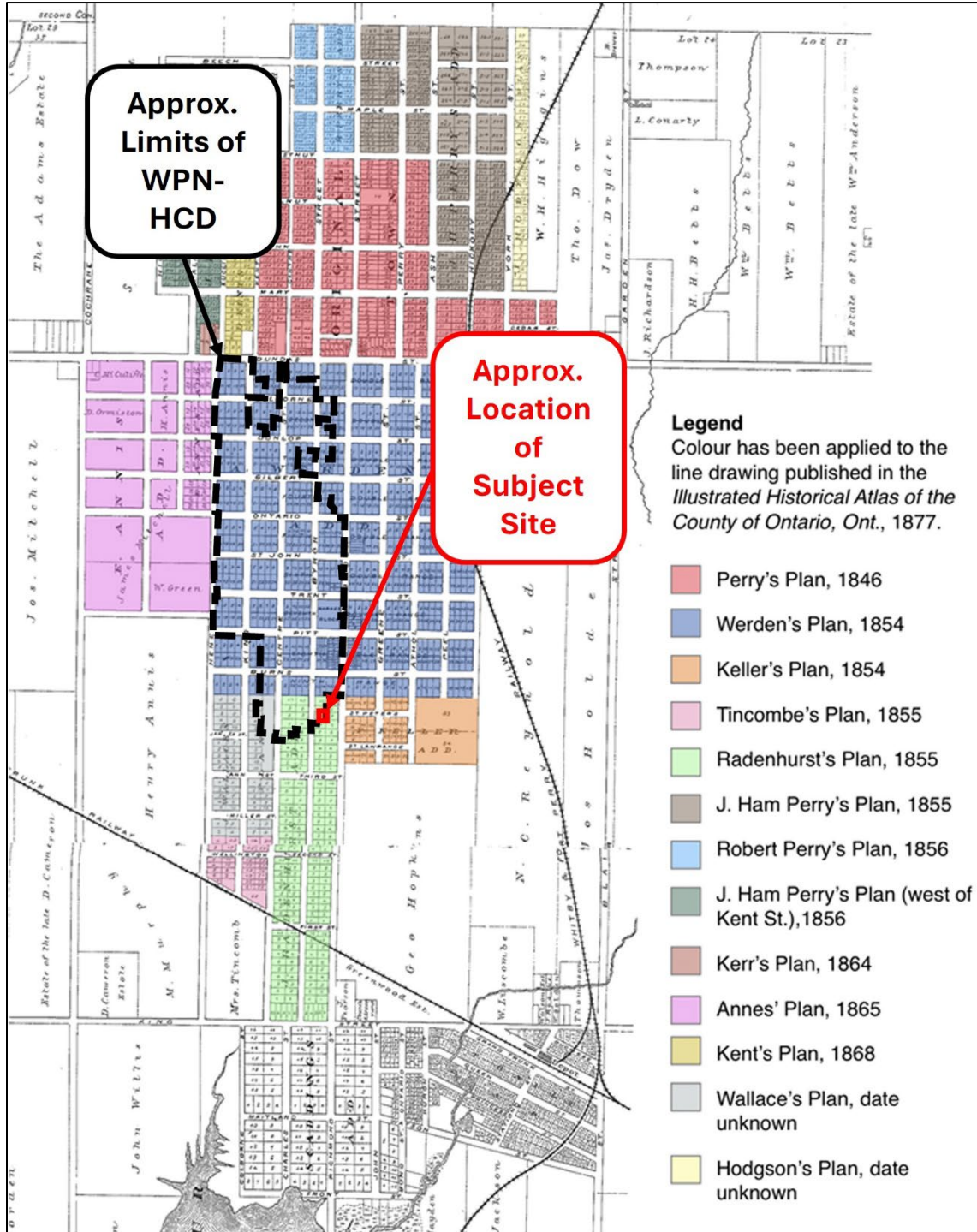
Although the site is classified as “Historic” it is not identified as one of the features important in the WPN-HCD (see Figure 10 below).

“Complementary” properties are those that include properties dating, or appearing to date, from the mid-twentieth century or later (built after 1950), and are from this time period and are compatible with the district’s historic character. “Uncharacteristic” properties are neither “historic” nor “complementary.”

As of 2019, there were 24 individually designated properties under Part IV of the OHA, which are also subject to the WPN-HCD Plan’s objectives, policies, and guidelines. These properties are as follows: 210 Trent Street West; 219 Keith Street; 300 Byron Street South; 300 King Street; 301 Centre Street South; 306 Gilbert Street West; 312 and 316 Colborne Street West (merged as 312 Colborne Street West); 300 King Street; 319 Dunlop Street West; 400 Byron Street South; 400 Centre Street South; 400 King Street; 401 Centre Street South; 402 Byron Street South; 404 Byron Street South; 413 Byron Street South; 416 Centre Street South; 501 Byron Street South; 508 Byron Street South; 513 Centre Street South; 600 King Street; 604 Brock Street South; 616 King Street; 800 Centre Street South; 900 (910) Brock Street South. None of the 24 individually designated properties are located adjacent to the subject site, nor is the site itself an individually designated heritage property.

Notwithstanding, there are two properties located adjacent to the subject site that have heritage status: 925 Byron Street South and 122 Keith Street have heritage status, with both being Part V designated properties classified as “Complementary” and “Historic” resources, respectively. Generally, everything to the west, northwest, and north of the site is designated by default as part of the WPN-HCD under Part V of the Ontario Heritage Act.

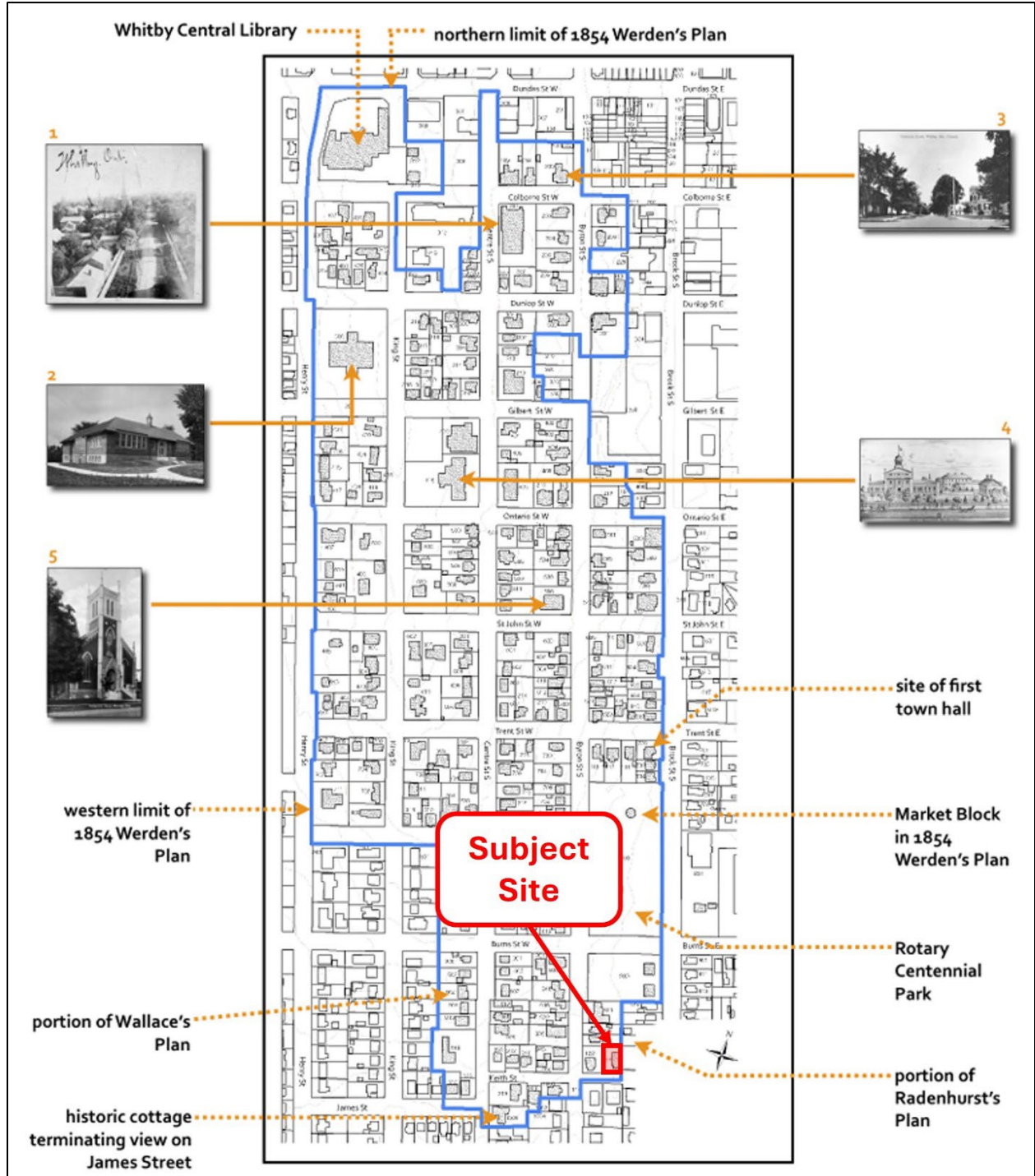
Figure 9 - Old Plans of Subdivision 1846 - 1868



Source: Town of Whitby, 2017a



**Figure 10 - Features Important in the WPN-HCD**



Source: Town of Whitby, 2017a

Werden's Plan Neighbourhood holds cultural heritage value due to its preservation of features from Whitby's long historic period (mid-19th to mid-20th century), during which it

remained a stable small town. The district contains the largest concentration of historic residential streetscapes in Downtown Whitby and landmarks of local and provincial importance. Public open spaces and assets contribute to its value. Most buildings are single-detached houses reflecting a range of traditional architectural styles, showcasing the domestic aspirations of the time. There is a mix of house sizes, indicating social diversity typical of small towns, with larger homes on spacious lots that maintain Whitby's historic pattern of private open spaces. Many houses share similar features like front yards, mature trees, and detached garages, creating a cohesive neighbourhood character. Historic landmarks, including St. Mark's United Church and the Ontario County Courthouse, further enhance the district's significance. Additionally, public spaces like Rotary Centennial Park and long views of key buildings like All Saints' Anglican Church and the old County Courthouse define the district's visual appeal. The district also preserves the small-town feel through its tree canopy and the rural section of many streets.

Although there are no direct policies related to the demolition or removal of Historic buildings, this plan states that Town staff will consider proposals for demolition according to the plan's objectives, policies, guidelines and implementation strategy. Accordingly, Section 3.2.2 of the WPN-HCD Plan states that one of the objectives for buildings in the WPN-HCD is to consider buildings which are neither from the historic period nor are complementary to be candidates for demolition and replacement. Furthermore, Section 4.2.1.1 provides that the district's five historic landmarks, including St. Mark's United Church, R.A. Sennett School, the former Ontario County Registry Office, the Centennial Building, and St. Arsenije Sremac Serbian Orthodox Church, will be preserved. The Town will support their maintenance and restoration by seeking funding and ensuring any new uses do not compromise their heritage attributes. If removal, demolition, or alterations are proposed, a cultural heritage impact assessment may be required, and the Town reserves the right to refuse such applications, with property owners having the right to appeal.

The subject site is not one of the district's five historic landmarks. However, Section 4.2.1.2 provides that existing house forms on historic properties will be retained. If removal or demolition is proposed, the property owner must prepare a cultural heritage impact assessment. Similarly, Section 6.1.2.1 states that building demolition is one of the types of proposals requiring heritage review via a HPA, and Section 6.1.6 requires a HIA for such a proposal. Accordingly, this HIA has been prepared as part of a complete HPA requesting demolition of the house on site.

In the WPN-HCD Plan, retention is preferred for Historic or Complementary properties and that buildings classified as uncharacteristic are candidates for demolition or removal.

What the WPN-HCD fails to discuss is matters pertaining to the loss of heritage integrity in existing "Historic" or "Complementary" buildings.



# 5.0 HERITAGE IMPACT ASSESSMENT

This section assesses the potential impacts of the proposed demolition of the house on site, as well as any potential impacts on adjacent heritage properties. Additionally, this section assesses how the proposed mixed-use development might affect the character and overall setting of the Werden's Plan Neighbourhood Heritage Conservation District.

Development impacts can be either direct or indirect, and they may impact resources and landscapes differently over time. The impacts on a cultural heritage resource or landscape can either be specific to the site or widespread, and they can vary in severity from low, moderate, or high. The subsequent sub-sections examine the development proposal's potential impact on various impact categories, as outlined in Info Sheet #5: Heritage Impact Assessments and Conservation Plans the Ontario Heritage Toolkit.

## 5.1 Alteration

Alterations are not proposed to the structure on site, nor to any of the existing structures adjacent to the subject site. Therefore, an assessment of impacts as a result of alterations is not applicable.

## 5.2 Shadows

No new additions, alterations, or other interventions are proposed for the structure on site, or on the subject site in a new location, nor is any development proposed to adjacent properties. Therefore, an assessment of impacts as a result of shadows is not applicable.

## 5.3 Isolation

The house on site is proposed to be demolished as a result of extensive fire damage. No heritage resources or adjacent heritage structures will be isolated as a result of this. Therefore, an assessment of impacts related to isolation of resources is not applicable.

## **5.4 Direct Or Indirect Obstruction Of Views**

The house on site is proposed to be demolished as a result of extensive fire damage. No identified views or view corridors will be affected as a result of this. Therefore, an assessment of impacts related to the direct or indirect obstruction of views is not applicable.

## **5.5 Change In Land Use**

No change in land use is proposed for the subject site or the adjacent designated properties. Should the HPA be approved resulting in the demolition of the house on site, the site will become vacant, leaving a hole in the building edge along this section of Keith Street.

While the demolition of the house on Keith Street will result in a temporary gap in the building edge, this impact is expected to be negligible, especially over time. The Town's Official Plan and Zoning By-law generally support infill development and provide policies and regulation that will help any future building application to align with the existing neighbourhood character. Future construction on the site can be designed to complement the surrounding area, adhering to any applicable design guidelines and the Werden's Plan Neighbourhood Heritage Conservation District Plan. These existing documents represent the planning framework for the area. Although there may be a short-term disruption as a result in the site becoming vacant, the long-term development of the site will be directed, regulated, and guided by this framework, providing a basis from which a future building can be designed to maintain the aesthetic and cultural integrity of the neighbourhood.

## **5.6 Land Disturbances**

Land disturbance impacts are typically associated with archaeological matters below grade. The only land disturbances proposed would be part of the demolition activities to excavate the existing basement.

As such, we do not anticipate any impacts with respect to new soil disturbances on site, especially since the only earth moving activities proposed are exceptionally non-invasive and limited to the removal of the existing foundation and basement, which will require minimal excavation. Accordingly, no impacts related to land disturbances are anticipated.

## 5.7 Destruction

The house has been mostly destroyed by fire and, prior to that, had undergone extensive alterations and additions over the years. As a result, it is no longer in its original or stable condition. Therefore, in our opinion, the proposed demolition will have a negligible impact on both the site and the overall character of the Werden’s Plan Neighbourhood Heritage Conservation District. If the house had not already been severely destroyed by fire, the demolition of the house, as a “Historic” property in the WPN-HCD would be more severe.

### **Destruction by Fire**

As seen in the images above, the house on site has been burned and ravaged by fire and has, in our opinion, experienced a significant loss of heritage integrity. The fire has destroyed or severely damaged the surviving physical features and original craftsmanship that would have once represented the cultural heritage value of the property. Any key architectural details and/or historically significant materials have been lost and/or irreparably altered, which diminishes the site's ability to convey its original design and historical context. The loss of physical evidence due to the fire further erodes its cultural heritage value. Without these defining elements, the house, in our opinion, no longer adequately supports its historical or cultural significance.

### **Loss of Heritage Integrity**

Heritage integrity is typically assessed through two key scenarios: the loss of originality and / or the loss of structural integrity. First, when a building suffers damage beyond reasonable repair—whether due to fire, neglect, or other causes—its structural integrity may be compromised to a point where restoration is no longer feasible. Second, when a building has undergone significant alterations or modifications over time, resulting in the loss of its original design and materials, it may no longer represent the historical value for which it was recognized. In both cases, the loss of heritage integrity often leads to a re-evaluation of whether a building is still worthy of long-term protection.

#### Originality

In our opinion, even before the fire, the house on the site had already been heavily altered without regard for its original design. Based on the site visit, these changes included a large single-storey addition with a flat roof at the rear that, while functional, was not in keeping with the original house design; the subdivision of the house into multiple rental units; and the creation of new primary access points, altering the original layout for ingress and egress to accommodate tenants. Additional modifications, such as the application of composite siding over the original wood rather than its repair and maintenance, along with a mix of



materials around the base of the house, further contributed to the loss of its original character.

### Structural Integrity

Ehsan Tawhidi & Associates, a structural engineering firm, was retained to undertake a structural assessment of the house. A copy of their structural assessment is enclosed as part of the complete HPA.

Ehsan Tawhidi & Associates has concluded that the house on site has suffered severe structural damage due to the fire and prolonged exposure to winter conditions. The rear addition of the house is extensively burnt, with collapsing wood framing and cracking foundation walls, making it unsafe. The front (original portion) of the house is also compromised, with signs of fire and frost damage and structural misalignments. The damage is so extensive that repair work would be extensive if not a complete reconstruction and repair costs were suggested to exceed the cost of rebuilding.

Overall, Ehsan Tawhidi & Associates have recommended that the house be demolished immediately to ensure public safety. The site should be cordoned off, and a demolition company should be hired.

### **Conclusion**

In our opinion, due to the destruction of the house and its loss of heritage integrity that has already occurred, the proposed demolition is both negligible in terms of impact and recommended by the structural engineer to ensure public health and safety.

# 6.0 MITIGATION & CONSERVATION RECOMMENDATIONS

## 6.1 Alternative Development Options

A Heritage Impact Assessment typically explores alternative development options for the subject site to evaluate all possible land-use alternatives in relation to heritage conservation. The goal is often to determine if there are less intrusive or impactful options available while balancing the objectives of both conservation and development.

Given the absence of identified negative impacts, the only feasible alternatives are to leave the site as it is or to carry out comprehensive repairs. However, leaving the site untouched is not advisable due to the house's severe state of disrepair, which poses a significant health and safety risk and visually detracts from the character of the area given the hoarding and visible fire damage. Therefore, this option is not recommended.

The rehabilitation option would involve extensive disassembly, inspection, and reconstruction to the point where the house would almost, if not entirely, be rebuilt—essentially amounting to a demolition. Moreover, the scale of the work required to reconstruct the building, which has already lost much of its heritage integrity, would result in a structure that is more a reimagining than a true conservation effort. This process would also be prohibitively expensive, as confirmed by a structural engineer, likely costing more than demolishing and constructing a new building. As such, this alternative is also not recommended.

## 6.2 Recommendations for Mitigation & Conservation

The following mitigation and conservation options are recommended:

1. Hoarding Plan and Warning Clauses During Demolition Activities: To ensure the protection of the adjacent structures at 925 Byron Street South and 122 Keith Street during demolition activities, a comprehensive hoarding plan is recommended. This plan should involve the installation of a solid barrier along the property lines of the adjacent structures at these addresses. The hoarding should be at least 8 feet in height, constructed with durable materials such as plywood or metal panels, and designed to withstand environmental factors and potential debris from the demolition. Stability will be further ensured through reinforced

bracing systems to prevent any collapse or damage due to the proximity of heavy machinery.

A safe buffer zone should be established between the demolition site and these neighbouring properties by positioning the hoarding at a sufficient distance from both structures. This will help minimize any potential vibrations or structural stress during the demolition process. Daily cleanup protocols should also be implemented to prevent any accumulation of loose materials near the hoarding, further safeguarding the surrounding area.

Clear communication with the owners or occupants of 925 Byron Street South and 122 Keith Street should be maintained throughout the demolition process, providing updates on the schedule and contact information for addressing any concerns or emergencies.

In the demolition permit notes, it is recommended to include specific instructions to contractors regarding the careful operation of machinery near the adjacent properties at 925 Byron Street South and 122 Keith Street. Contractors should be instructed to exercise extreme caution when operating equipment in close proximity to these structures to avoid causing unintended damage.

Additionally, contractors should minimize the use of high-impact equipment, such as hydraulic hammers or other heavy-duty machinery, near these sensitive areas to reduce vibrations and avoid compromising the foundations or structures of the adjacent properties. Operators must be aware of the buffer zones established by the hoarding and maintain safe distances at all times.

Contractors should also be reminded to document these properties prior to commencing any demolition and monitor the conditions of the adjacent properties throughout the demolition process, reporting any signs of damage or movement immediately. Regular checks and communication with site supervisors are recommended to ensure that all machinery is being operated with care near these properties. These precautions must be reinforced in the daily briefings to ensure all personnel are aware of the safety measures in place.

By adhering to this hoarding plan, the demolition process can be conducted in a manner that prioritizes the safety and protection of the adjacent properties, minimizing risks and ensuring structural integrity is maintained.



### **6.3 Implementation & Monitoring**

Implementation and monitoring of the above recommendations should be as follows. Normally, each recommendation is assigned their own timing category and who is responsible for carrying out each recommendation. However, for each of the above recommendations, the implementation and monitoring are the same.

Accordingly, the timing for completion should be tied to the demolition permit process. That is, the final demolition permit should include the suggested hoarding plan and warning clauses.

The responsibility will be on the Owner / Developer to agree to these recommendations which could be secured through the final demolition permit itself. Monitoring of these recommendations can take place through the execution of the demolition permit via the final inspection conducted to ensure that all work has been carried out in compliance with the permit conditions.

## 7.0 CONCLUSIONS

This Heritage Impact Assessment for the proposed demolition of the house at 114 Keith Street in Whitby, has carefully assessed the potential impacts on both the subject site and the surrounding Werden's Plan Neighbourhood Heritage Conservation District.

The existing structure has suffered extensive damage from fire, resulting in a significant loss of heritage and structural integrity. Based on structural assessments and the state of disrepair, rehabilitation is neither feasible nor practical, and leaving the structure in its current condition poses a public safety risk.

The assessment concludes that the demolition will have no to negligible adverse impacts on the subject site, the character of the WPN-HCD, or adjacent heritage properties, provided that appropriate mitigation measures, such as the recommended hoarding plan, are implemented to protect neighbouring properties during demolition activities. With these safeguards in place, the demolition can be carried out safely, preserving the adjacent heritage homes.

Based on the findings and recommendations, it is concluded that the proposed demolition will have no or negligible impact on the subject site, as the house is already largely destroyed. Furthermore, the demolition will not diminish the cultural heritage value of the district. Therefore, approval of the Heritage Permit Application is recommended.

Your truly,

**The Biglieri Group Ltd.**



**Evan Sugden, HBASc, MA, CAHP, RPP, MCIP**

Associate | Heritage Lead



**Giuseppe Ferreri, BES**

Junior Heritage Planner

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