CITY OF BRAMPTON PROJECT NUMBER: 209-00238-00

## HERITAGE IMPACT ASSESSMENT VICTORIA PARK ARENA, 20 VICTORIA CRESCENT

FEBRUARY 24, 2021





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**CITY OF BRAMPTON** 

FINAL

PROJECT NO.: 209-00238-00 DATE: FEBRUARY 24, 2021

WSP 582 LANCASTER STREET WEST KITCHENER, ON N2K 1M3

T: +1 519 743 8777 WSP.COM

## SIGNATURES

PREPARED BY

Chelsey Tyers, BES, MCIP, RPP Cultural Heritage Specialist

APPROVED<sup>1</sup> BY

Joel Konrad, PhD, CAHP, Cultural Heritage Lead - Ontario

February 24, 2021 Date

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## CONTRIBUTORS

CLIENT

Contact	Sonika Soor, P.Eng. PMP Project Manager, Building Design and Construction Public Works & Engineering, City of Brampton
WSP	
Cultural Heritage Specialist	Chelsey Tyers, BES, RPP, MCIP Cultural Heritage Specialist
Mapping/GIS	Andrew Turner, HBA Geomatics Specialist
Report Review	Joel Konrad, PhD, CAHP Cultural Heritage Lead, Ontario Cultural Heritage Specialist
Administrative Support	Lyn Pederson Document Control

## **EXECUTIVE SUMMARY**

WSP Canada Inc. was retained by the City of Brampton to complete a scoped Heritage Impact Assessment for Victoria Park Arena located at 20 Victoria Crescent in the City of Brampton. Located on the north side of Victoria Crescent, between a residential area to the north and an industrial area to the south, Victoria Park includes the Arena constructed in 1966, a one-storey daycare, the fieldhouse attached to the Victoria Park Stadium, several sports fields and a parking lot. The subject property is not listed on the City of Brampton's Municipal Register of Cultural Heritage Resources nor is it designated under Part IV or Part V of the *Ontario Heritage Act,* but it has been identified by the City of Brampton's City Council as a significant historical asset.

Victoria Park Arena was subject to a fire in 2016 when it was closed indefinitely. After thorough consideration the City of Brampton's Committee of Council decided at its meeting on May 29, 2019 to demolish the Victoria Park Arena and to replace it with a new recreational facility. At this meeting, Committee of Council also acknowledged Victoria Park Arena as a significant historical asset to the Brampton community and resolved that every effort should be made to incorporate important architectural elements in the design of the new building to commemorate the original Arena.

This purpose of this report is to provide a documentary record of the Victoria Park Arena, to record the study area's site specific and contextual history, to identify the important heritage elements that should be salvaged, provide recommendations for how they can be incorporated into the design of the new recreational facility and to provide any additional mitigation measures that would ensure further commemoration of the original Arena.

Based on the review and analysis of mitigation measures, the following recommendations are provided.

### SUMMARY OF KEY RECOMMENDATIONS

The following recommendations to mitigate the impact of the loss of Victoria Park Arena include:

- 1 That a copy of this scoped Heritage Impact Assessment be submitted to the Peel Art Gallery, Museum and Archives (PAMA) and the Brampton Library's local history section to provide a documentary record of the Victoria Park Arena.
- 2 That unique and distinct architectural features be salvaged including:
  - a The front section of glulam beams that do not have significant fire damage;
  - b The concrete pillars supporting these glulam beams; and,
  - c The 1966 date plaque.
- 3 That salvaged materials be thoughtfully and meaningfully incorporated into the new recreational facility.
- 4 That an interpretive plaque or display be installed in the new recreational facility in a highly trafficked, publicly accessible space.

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## **1 INTRODUCTION**

WSP Canada Inc. was retained by the City of Brampton in December 2020 to conduct a scoped Heritage Impact Assessment (HIA) for the property at 20 Victoria Crescent, City of Brampton, known as Victoria Park Arena (see Figure 1). The property is not listed on the City of Brampton's Municipal Heritage Register nor is it designated under the *Ontario Heritage Act* (OHA) (2006). The approximately 23-acre property includes a large arena, a one-storey commercial building currently used as a daycare, the Fieldhouse attached to the Victoria Park Stadium, sports fields and a parking lot (Figure 1). At its meeting on May 29, 2019, the City of Brampton's Committee of Council acknowledged Victoria Park as a significant historical asset to the Brampton community, however, the subject property is not listed on the City of Brampton's Municipal Register of Cultural Heritage Resources nor is it designated under Part IV or Part V of the *Ontario Heritage Act*.

The Victoria Park Arena was subject to a fire in May 2016, which caused extensive fire and smoke damage to the whole facility. The City of Brampton's intent is to demolish the remains of the Victoria Park Arena to allow construction of a new recreational facility that will provide modern amenities including a dry floor. Plans for the new facility have not yet been designed. A scoped HIA is required to document the history of the Victoria Park Arena, record the existing conditions of the property and identify mitigation measures to respond to the loss of the Victoria Park Arena.

This HIA was undertaken by Chelsey Tyers, Cultural Heritage Specialist with WSP (Appendix B). The descriptions of the subject property are based on a site visit conducted around the exterior of the building on January 7, 2021, by Chelsey Tyers and in the interior by Daniel Buck, Environmental Technician on December 16, 2020. It should be noted that Victoria Park Arena does not have working electricity, as reflected by interior pictures taken by WSP. As such, some interior photos were provided by the City of Brampton and included in this report to reflect the interior conditions prior to the fire.

This HIA is structured to adhere to the City of Brampton's *Heritage Impact Assessment - Terms of Reference* (June 2017) as scoped by the City's Heritage Planner, Ana Martins (Appendix C) and guidance provided in the Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI) *Ontario Heritage Tool Kit: Heritage Resources in Land Use Planning Process* (2006), the OHA, Section 2(d) of the *Planning Act*, Section 2.6.3 of the *Provincial Policy Statement* (2020), and Section 4.10 of the *City of Brampton Official Plan* (2006).

To address the requirements of the scoped HIA, this report provides the following information:

- Background on the project and introduction to the development site;
- A summary of the history of Victoria Park Arena and its context including a review of the former Township History, history of Bramalea, land registry records, census records, newspaper articles, etc.;
- Documentation of apparent physical conditions;
- A description of the proposed development;
- An evaluation of the advantages and disadvantages of mitigation measures;
- Recommendations for appropriate mitigation measures; and,
- Recommendations for salvage of materials and inclusion of materials in new development.

Figure 1: Location Map

## 2 POLICY FRAMEWORK

### 2.1 PLANNING ACT AND PROVINCIAL POLICY STATEMENT

The *Planning Act* (1990) and the *Provincial Policy Statement* (PPS) (Ministry of Municipal Affairs and Housing (MMAH), 2020) issued under Section 3 of the *Planning Act*, provide Ontario-wide policy direction on land use planning. All decisions affecting land use planning "shall be consistent with" the PPS, which identifies that properties and features demonstrating significant architectural, cultural, historical, archaeological, technical or scientific interest are of provincial interest and should be conserved.

The importance of identifying, evaluating and conserving built heritage resources and cultural heritage landscapes is noted in two sections of the PPS 2020:

- Section 2.6.1 "Significant built heritage resources and significant heritage landscapes shall be conserved"; and,
- Section 2.6.3 "Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property except where the proposed development and site alteration has been evaluated and it has been demonstrated that the heritage attributes of the protected heritage property will be conserved."

The following concepts, as defined in the PPS, are fundamental to an understanding of the conservation of cultural heritage resources in Ontario:

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

**Conserved** is defined as "the identification, protection, management and use of *built heritage resources*, *cultural heritage landscapes* and *archaeological resources* in a manner that ensures their cultural heritage value or interest is retained. This may be achieved by the implementation of recommendations set out in a conservation plan, archaeological assessment, and/or heritage impact assessment that has been approved, accepted or adopted by the relevant planning authority and/or decision-maker. Mitigative measures and/or alternative development approaches can be included in these plans and assessments."

**Cultural heritage landscapes** (CHL) "means a defined geographical area that may have been modified by human activity and is identified as having cultural heritage value or interest by a community, including an Indigenous community. The area may include features such as buildings, structures, spaces, views, archaeological sites or natural elements that are valued together for their interrelationship, meaning or association. Cultural heritage landscapes may be properties that have been determined to have cultural heritage value or interest under the *Ontario Heritage Act* or have been included on federal and/or international registers, and/or protected through official plan, zoning by-law, or other land use planning mechanisms."

**Heritage attributes** "means the principal features or elements that contribute to a protected heritage property's cultural heritage value or interest, and may include the property's built, constructed, or manufactured elements, as well as natural landforms, vegetation, water features, and its visual setting (e.g. significant views or vistas to or from a protected heritage property)."

**Significant** 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*."

## 2.2 ONTARIO HERITAGE ACT

The OHA gives municipalities and the provincial government powers to preserve the heritage of Ontario, with a primary focus on protecting heritage properties and archaeological sites. The OHA grants authority to municipalities and the province to identify and designate properties of heritage significance, provide standards and guidelines for the preservation of heritage properties and enhance protection of heritage conservation districts, marine heritage sites and archaeological resources.

Properties can be designated individually (Part IV of the OHA) or as part of a larger group of properties, known as a Heritage Conservation District (Part V of the OHA). Designation offers protection for the properties under Sections 33 and 34 of the OHA, prohibiting the owner of a designated property from altering, demolishing or removing a building or structure on the property unless the owner applies to the council of the municipality and receives written consent to proceed with the alteration, demolition or removal.

In addition to designated properties, the OHA allows municipalities to list properties that are considered to have CHVI on their Register, which provides interim protection against demolition in the form of a 60-day delay in issuing a demolition permit. Under Part IV, Section 27, municipalities must maintain a Register of properties situated in the municipality that are of CHVI. Section 27 (1.1) states that the Register shall be kept by the Clerk and that it must list all designated properties (Part IV and V). Under Section 27 (1.2), the Register may include a property that has not been designated, but that the municipal council believes to possess CHVI. Listed properties, although recognized as having CHVI, are not protected under the OHA against demolition or unsympathetic alteration as are designated properties but are acknowledged under Section 2 of the *PPS* (MMAH, 2020).

## 2.3 ONTARIO REGULATION 9/06

The evaluation of cultural heritage resources is guided by *Ontario Regulation 9/06* (O. Reg 9/06), which provides three principal criteria with nine sub-criteria for determining CHVI. The criteria set out in the regulation were developed to identify and evaluate properties for designation under the OHA. Best practices in evaluating properties that are not yet protected employ O. Reg. 9/06 to determine if they have CHVI. These criteria include: design or physical value, historical or associative value and contextual value.

1. The property has design value or physical value because it,

i. is a rare, unique, representative or early example of a style, type, expression, material or construction method,

ii. displays a high degree of craftsmanship or artistic merit, or

iii. demonstrates a high degree of technical or scientific achievement.

2. The property has historical value or associative value because it,

i. has direct associations with a theme, event, belief, person, activity, organization or institution that is significant to a community,

ii. yields, or has the potential to yield, information that contributes to an understanding of a community or culture, or

iii. demonstrates or reflects the work or ideas of an architect, artist, builder, designer or theorist who is significant to a community.

- 3. The property has contextual value because it,
  - i. is important in defining, maintaining or supporting the character of an area,

ii. is physically, functionally, visually or historically linked to its surroundings, or iii. is a landmark. O. Reg. 9/06, s. 1 (2).

### 2.4 MHSTCI HERITAGE RESOURCES IN LAND USE PLANNING

The MHSTCI's *Heritage Resources in Land Use Planning Process* (2006) identifies HIAs as an important tool to evaluate cultural heritage resources and to determine appropriate conservation options. The document identifies what an HIA should contain and any specific municipal requirements.

To determine the effect that a proposed development or site alteration may have on a significant cultural heritage resource, the MHSTCI's *Heritage Resources in Land Use Planning Process* outlines seven potential negative or indirect impacts:

- Destruction of any, or part of any, significant heritage attributes or features;
- Alteration that is not sympathetic, or is incompatible, with the historic fabric and appearance;
- **Shadows** created that alter the appearance of a heritage attribute or change the viability of a natural feature or plantings, such as a garden;
- **Isolation** of a heritage attribute from its surrounding environment, context or a significant relationship;
- Direct or indirect obstruction of significant views or vistas within, from, or of built and natural features;
- A change in land use such as rezoning a battlefield from open space to residential use, allowing new development or site alteration to fill in the formerly open spaces;
- Land disturbances such as a change in grade that alters soils, and drainage patterns that adversely affect an archaeological resource.

## 2.5 PEEL REGION OFFICIAL PLAN

The *Peel Region Official Plan* (2018) was first adopted by Regional Council on July 11, 1996 through By-law 54-96 and was subsequently approved with modifications by the Minister of Municipal Affairs and Housing. There have been many amendments approved by the Minister since. The Office Consolidated version of Plan was released in 2018.

Section 3.6: Cultural Heritage addresses heritage resource conservation. Relevant policies include:

- 3.6.2.5 Direct the area municipalities to require, in their official plans, that the proponents of development proposals affecting heritage resources provide for sufficient documentation to meet Provincial requirements and address the Region's objectives with respect to cultural heritage resources.
- 3.6.2.6 Encourage and support the area municipalities in preparing, as part of any area municipal official plan, an inventory of cultural heritage resources and provision of guidelines for identification, evaluation and impact mitigation activities.

### 2.6 CITY OF BRAMPTON OFFICIAL PLAN

The City's *Official Plan* (2006) was adopted by City Council in October 2006 and approved in part by an Ontario Municipal Board (OMB) Order in October 2008 and last consolidated in September 2020. It provides policy on a wide range of topics including future land use, physical development, and future infrastructure needs to provide a balance between the needs of individual residents and the greater community.

Section 4.10 of the Official Plan provides policies specific to cultural heritage resources across the City.

### 2.6.1 CULTURAL HERITAGE IMPACT ASSESSMENTS

The following sections of the City of Brampton's *Official Plan* identify when a Heritage Impact Assessment is required and provides appropriate guidance for the retention or documentation and salvage of cultural heritage resources. Relevant policies within the *Official Plan* include:

- S. 4.10.1.10 A Heritage Impact Assessment, prepared by qualified heritage conservation professional, shall be required for any proposed alteration, construction, or development involving or adjacent to a designated heritage resource to demonstrate that the heritage property and its heritage attributes are not adversely affected. Mitigation measures and/or alternative development approaches shall be required as part of the approval conditions to ameliorate any potential adverse impacts that may be caused to the designated heritage resources and their heritage attributes. Due consideration will be given to the following factors in reviewing such applications:
  - i. The cultural heritage values of the property and the specific heritage attributes that contribute to this value as described in the register;
  - ii. The current condition and use of the building or structure and its potential for future adaptive re-use;
  - iii. The property owner's economic circumstances and ways in which financial impacts of the decision could be mitigated;
  - iv. Demonstrations of the community's interest and investment (e.g. past grants);
  - v. Assessment of the impact of loss of the building or structure on the property's cultural heritage value, as well as on the character of the area and environment; and,
  - vi. Planning and other land use considerations.
- S. 4.10.1.11 A Heritage Impact Assessment may also be required for any proposed alteration work or development activities involving or adjacent to heritage resources to ensure that there will be no adverse impacts caused to the resources and their heritage attributes. Mitigation measures shall be imposed as a condition of approval of such applications.
- S. 4.10.1.12 All options for on-site retention of properties of cultural heritage significance shall be exhausted before resorting to relocation. The following alternatives shall be given due consideration in order of priority:
  - i. On-site retention in the original use and integration with the surrounding or new development;
  - ii. On site retention in an adaptive re-use;
  - iii. Relocation to another site within the same development; and,
  - iv. Relocation to a sympathetic site within the City.
- S. 4.10.1.13 In the event that relocation, dismantling, salvage or demolition is inevitable, thorough documentation and other mitigation measures shall be undertaken for the heritage resource. The documentation shall be made available to the City for archival purposes.

### 2.6.2 BUILT HERITAGE POLICIES

The following sections of the City of Brampton's Official Plan identify the recognition and commitment to designate cultural heritage resources of significant cultural heritage value or interest and for their ongoing protection and conservation.

- S. 4.10.1.3 All significant heritage resources shall be designated as being of cultural heritage value or interest in accordance with the Ontario Heritage Act to help ensure effective protection and their continuing maintenance, conservation and restoration.
- S. 4.10.1.4 Criteria for assessing the heritage significance of cultural heritage resources shall be developed. Heritage significance refers to the aesthetic, historic, scientific, cultural, social or spiritual importance or significance of a resource for past, present or future generations. The significance of a cultural heritage resource is embodied in its heritage attributes and other character defining elements including: materials, forms, location, spatial configurations, uses and cultural associations or meanings. Assessment criteria may include one or more of the following core values:
  - Aesthetic, Design or Physical Value;
  - Historical or Associative Value; and/or,

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- Contextual Value.
- S. 4.10.1.6 The City will give immediate consideration to the designation of any heritage resource under the Ontario Heritage Act if that resource is threatened with demolition, significant alterations or other potentially adverse impacts.
- S. 4.10.1.8 Heritage resources will be protected and conserved in accordance with the Standards and Guidelines for the Conservation of Historic Places in Canada, the Appleton Charter for the Protection and Enhancement of the Built Environment and other recognized heritage protocols and standards. Protection, maintenance and stabilization of existing cultural heritage attributes and features over removal or replacement will be adopted as the core principles for all conservation projects.

### 2.7 FEDERAL AND PROVINCIAL HERITAGE GUIDELINES

Additional guidelines were considered including Parks Canada's *Standards and Guidelines for the Conservation of Historic Places in Canada* (Second Edition, 2010), hereafter referred to as Parks Canada's Standards and Guidelines; the former Ministry of Culture's *Eight Guiding Principles in the Conservation of Historic Properties* (1997) and *Heritage Conservation Principle's for Land Use Planning* (2007); and *Well Preserved: the Ontario Heritage Foundation's Manual of Principles and Practice for Architectural Conservation* (1988).

## **3 HISTORICAL CONTEXT**

## 3.1 PRE-EUROPEAN CONTACT PERIOD

The first populations to occupy southern Ontario are referred to as 'Paleoindians' (Ellis and Deller, 1990:39), though this era is now referred to as the Paleo period. Paleo period populations moved into the region following the retreat of the Laurentide Ice Sheet approximately 11,000 years before present (BP).

Early Paleo period groups are identified by their distinctive projectile point morphologies, exhibiting long grooves, or 'flutes', that likely functioned as a hafting mechanism. These Early Paleo group projectile morphologies include Gainey (ca. 10,900 BP), Barnes (ca. 10,700 BP), and Crowfield (ca. 10,500 BP) (Ellis and Deller, 1990:39-43). By approximately 10,400 BP, Paleo projectile points transitioned to various un-fluted varieties such as Holocombe (ca. 10,300 BP), Hi-Lo (ca. 10,100 BP), and Unstemmed and Stemmed Lanceolate (ca. 10,400 to 9,500 BP). These morphologies were utilized by Late Paleoperiod groups (Ellis and Deller, 1990:40).

Both Early and Late Paleo period populations were highly mobile, participating in the hunting of large game animals. Paleo period sites often functioned as small campsites (less than 200 m<sup>2</sup>) where stone tool production and maintenance occurred (Ellis and Deller, 1990).

By approximately 8,000 BP the climate of Ontario began to warm. As a result, deciduous flora began to colonize the region. With this shift in flora came new faunal resources, resulting in a transition in the ways populations exploited their environments. This transition resulted in a change of tool-kits and subsistence strategies recognizable in the archaeological record, resulting in what is referred to archaeologically as the Archaic period. The Archaic period in southern Ontario is dived into three phases: the Early Archaic (ca. 10,000 to 8,000 BP), the Middle Archaic (ca. 8,000 to 4,500 BP) and the Late Archaic (ca. 4,500 to 2,800 BP) (Ellis et al., 1990).

The Archaic period is differentiated from earlier Paleo populations by a number of traits such as: 1) an increase in tool stone variation and reliance on local tool stone sources, 2) the emergence of notched and stemmed projectile point morphologies, 3) a reduction in extensively flaked tools, 4) the use of native copper, 5) the use of bone tools for hooks, gorges, and harpoons, 6) an increase in extensive trade networks and 7) the production of ground stone tools. Also noted is an increase in the recovery of large woodworking tools such as chisels, adzes, and axes (Ellis and Deller, 1990:65- 66). The Archaic period is also marked by population growth. Archaeological evidence suggests that by the end of the Middle Archaic period (ca. 4,500 BP) populations were steadily increasing in size (Ellis et al., 1990). Over the course of the Archaic period populations began to rely on more localized hunting and gathering territories. By the end of the Archaic period, populations were utilizing more seasonal rounds. From spring to fall, settlements would exploit lakeshore/riverine locations where a broad-based subsistence strategy could be employed, while the late fall and winter months would be spent at interior site where deer hunting was likely a primary focus with some wild edibles likely being collected (Ellis and Deller, 1990:114). This steady increase in population size and adoption of a more localized seasonal subsistence strategy eventually evolved into what is termed the Woodland period.

The Woodland period is characterized by the emergence of ceramic technology for the manufacture of pottery. Similar to the Archaic period, the Woodland period is separated into three primary timeframes: the Early Woodland (approximately 800 BC to 0 AD), the Middle Woodland (approximately 0 AD to 700/900 AD) and the Late Woodland (approximately 900 AD to 1600 AD) (Spence et al., 1990; Fox, 1990).

The Early Woodland period is represented in southern Ontario by two different cultural complexes: the Meadowood Complex (ca. 900 to 500 BC) and the Middlesex Complex (ca. 500 BC to 0 AD). During this period the life ways of Early Woodland population differed little from that of the Late Archaic with hunting and gathering representing the primary subsistence strategies. The pottery of this period is characterized by its relatively crude construction and lack of decorations. These early ceramics exhibit cord impressions, likely resulting from the techniques used during manufacture (Spence et al., 1990).

The Middle Woodland period is differentiated from the Early Woodland period by changes in lithic tool morphologies (projectile points) and the increased elaboration of ceramic vessels (Spence et al., 1990). In southern Ontario, the Middle Woodland is observed in three different cultural complexes: the Point Peninsula Complex to the north and northeast of Lake Ontario, the Couture Complex near Lake St. Claire and the Saugeen Complex throughout the remainder of southern Ontario. These groups can be identified by their use of either dentate or pseudo-scalloped ceramic decorations. It is by the end of the Middle Woodland period that archaeological evidence begins to suggest the rudimentary use of maize (corn) horticulture (Warrick, 2000).

The adoption and expansion of maize horticulture during the Late Woodland period allowed for an increase in population size, density, and complexity among Late Woodland populations. As a result, a shift in subsistence and settlement patterns occurred, with the adoption of a more sedentary village life and reliance on maize horticulture, with beans, squash and tobacco also being grown. Nearing the end of the Late Woodland Period (approximately 1400 AD) villages reached their maximum size. During this period, increased warfare resulted in the development of larger villages with extensive palisades.

Early contact with European settlers at the end of the Late Woodland, Late Ontario Iroquoian period resulted in extensive change to the traditional lifestyles of most populations inhabiting southern Ontario.

### 3.2 COUNTY OF PEEL HISTORY

20 Victoria Crescent is in an area of the City of Brampton that was formerly part of the Township of Chinguacousy in the County of Peel, and in the late 1950s it became part of the planned satellite community known as Bramalea.

### 3.2.1 COUNTY OF PEEL

Euro Canadian settlement in the County of Peel began in 1819 by United Empire Loyalists. The land within the area was sold in parcels to individuals as well as awarded to soldiers in lots under the stipulation that a percentage of the land be cleared and planted. After the *Municipal Act* of 1849, Upper Canada was further sectioned into Townships to reflect land division in Britain, linking the County of Peel with those of York and Ontario. However, in 1867, due to the desire to retain greater control of local affairs, the County of Peel broke away from York and Ontario as an independent county (Loverseed, 1987).

### 3.2.2 CHINGUACOUSY TOWNSHIP

The Township of Chinguacousy was surveyed in 1819 and land was soon granted to United Empire Loyalists who began to settle in the area. The Etobicoke and Credit Rivers ran through the township, which provided an abundant water supply. The township was divided by Hurontario Street, which ran through its centre and from which concessions were numbered east and west. In 1828, Charles Haines constructed a mill near Cheltenham, and James Curry established one near Norval. By the mid-1800s, small villages of Campbell's Cross, Cheltenham, Snelgrove, Terra Cotta, Tullamore, and Victoria had developed. At this time, the population of the township had reached 7,000. Industries in the township included wheat production and the manufacturing of timber products. Further, lumber was hauled to Port Credit to allow it to be shipped to markets via Lake Ontario (Mika & Mika, 1977).

Brampton was established in 1834 and was incorporated as a village in 1852. Further settlement continued, and by 1867, Brampton was the location of the County of Peel's government (Mika & Mika, 1977). According to the census of 1871, the township's population was 6,129.

On January 1, 1974, the Township of Chinguacousy ceased to exist as a portion of it was annexed each by the City of Brampton and the Town of Caledon (Mika & Mika, 1977).

### 3.2.3 CITY OF BRAMPTON

Brampton was incorporated as a village in 1852, and as a town in 1873. Mr. William Buffy is credited as being an early settler in the town, having built the first tavern within its boundaries, which is said to have been the first substantial building within the town (Walker and Miles, 1877). Brampton had a predominantly agricultural economy with few other industries until the introduction of a railway in the mid-nineteenth century, which connected it with towns and cities in the surrounding area. Prior to the addition of the railway, the main trade routes to and from Brampton consisted of plank roads, which were found to be unreliable in wet weather and in constant need of repair. The Grand Trunk Railway was opened on June 16, 1856, providing a reliable route to Toronto and other areas, and creating an economic boom. The Peel Courthouse was completed in 1876 and it became a county seat until 1974 (Loverseed, 1987). Brampton housed a large greenhouse industry and was described as the most important agricultural supply point within the mainly agricultural tract of land to the north of Toronto (Chapman and Putnam 1984: 294). In 1974, the City of Brampton was created from the Town of Brampton, Toronto Gore Township and the southern half of Chinguacousy Township and a portion of the Town of Mississauga (Moreau, 2020).

### 3.2.4 BRAMALEA

Originally part of the Township of Chinguacousy and now the City of Brampton, Bramalea was designed as Canada's first satellite city (Cricket, 2013a). The first development of houses as part of the establishment of Bramalea as a satellite city were constructed c.1959 and occupied in 1960 (Cricket, 2013b). The first residential neighbourhood in the satellite city development was planned by Bramalea Consolidated Development Ltd. (Toronto Star, 1958). The satellite city concept was a new urban planning concept that was framed as an end to suburban sprawl. Located outside, but proximal, to a large metropolitan area, the satellite city was designed to be self-sustaining, balanced and to integrate community with industrial, commercial and residential areas to satisfy economic, cultural and social needs of the community. Bramalea is now a larger suburban district in the City of Brampton.

### 3.3 SITE SPECIFIC HISTORY

The study area lies within Part of Lots 1 and 2, Concession 4 East of Centre Road (or Hurontario Street). The following site-specific histories provide the history of the portion of Lots 1 and 2 that became the current property in the 1960s.

### 3.3.1 LOT 1, CONCESSION 4 EAST OF CENTRE ROAD

Lot 1, Concession 4 East of Centre Road was granted from the Crown to King's College on January 3, 1828 (PLRO). The University of Toronto was originally called King's College and Lot 1 was likely part of the 226,000 acres of crown land the institution was granted for the purposes of selling to obtain revenues to open and run the university (University of Toronto, n.d.).

On June 10, 1839 the Lot was sold to Samuel Wallace (PLRO Instrument 17233). The 1851 Census of Canada identifies Wallace as a 48-year-old farmer (Schedule A, Enumeration District 2, Pg. 79). Tremaine's 1859 *Map of the County of Peel* confirms Samuel Wallace owned Lot 1, Concession 4 East of Centre Road and identifies a dwelling footprint along the south border of the property east of a water feature running through the west part of the Lot (Figure 2). However, there are no building footprints on Lot 1 within the current study area identified in the map.

The east half of Lot 1 was sold to Louisa Bletcher on December 10, 1873 (PLRO Instrument 1712). The 1881 Census of Canada identifies Louisa as 46 years-old living with her 60-year-old husband Stephen and their children Arthur, Edward, Bertha and Theresa (Schedule 1, District 140, S. District 2, Page 7). The 1877 *Historical Atlas of the County of Peel* identifies the east half of Lot 1 belonging to Stephen Bletcher and along

the south border of the Lot there are two dwelling footprints, a barn footprint and a cultivated area identified (Figure 3). These buildings and cultivated areas are not within the footprint of the current subject property.

Louisa Bletcher sold the east half of Lot 1 to Robert Laycock on November 1883 (PLRO Instrument 4675). The 1909 topographic map identifies one frame dwelling on the east half of Lot 1, outside of the current study area (Figure 4). The 1929 and 1942 *Topographic Map* (Figure 5-6) and the 1954 Aerial Photo (Figure 7) demonstrate the continued agricultural use of the subject property and surrounding area. The east half of Lot 1 remained in the Laycock family until it was sold to Bayton Holdings Limited on January 22, 1958 (PLRO Instrument 25450). Bayton Holdings Ltd. and Close Brothers Ltd made up Bramalea Consolidated Developments Ltd, responsible for the initial development of Bramalea as a satellite city.

### 3.3.2 LOT 2, CONCESSION 4 EAST OF CENTRE ROAD

Lot 2, Concession 4 East of Centre Road was granted from the Crown to George Daggan on October 7, 1822 (PLRO). George Daggan sold the Lot to Matthew Chamber on May 16, 1823 (PLRO Instrument 4538). On December 27, 1844, the east half of the Lot was sold to Edward Pearson (PLRO Instrument 23816). Tremaine's 1859 *Map of the County of Peel* confirms that Edward Pearson owned Lot 2, Concession 4 East of Centre Road and does not identify any dwelling footprints on the Lot, but there is a water feature that travels north to south through the middle of the Lot (Figure 2).

It was then sold to Peter Wardlaw on October 4, 1870 (PLRO Instrument 668). The 1877 *Historical Atlas of the County of Peel* (Figure 3) identifies the property belonging to Jason Wardlaw as well as a building and barn footprint and a cultivated area along the south border of the Lot, just north of the current property boundary. The Department of Militia and Defence's 1909 *Topographic Map* identifies a frame dwelling on the east half of Lot 2, northeast of the subject property (Figure 4). The east half of the Lot remained in the Wardlaw family until October 31, 1923 when it was sold to Henry Robinson (PLRO Instrument 14967). The 1929 and 1942 *Topographic Map* (Figure 5-6) and the 1954 Aerial Photo (Figure 7) demonstrate the little change to the subject property and continued agricultural use of the surrounding area. The east half of the Lot was sold on September 20, 1954 to Doris and William Sheard (PLRO Instrument 23181) and then to Bayton Holdings Limited on February 12, 1958 (PLRO Instrument 25519).

### 3.3.3 VICTORIA PARK

The 1962 *Topographic Map* (Figure 8) demonstrates the boom of residential development in the new satellite city known as Bramalea. North of the subject property the map depicts residential subdivisions both completed and identified as under construction.

Located close to the Bramalea Shopping Centre and nearby residential development, Victoria Park was a centennial project that formed a barrier between the residential and selected industrial lands and was an important component of the Satellite City concept that intended to provide a self-sustaining community where people would live, work and play. The Victoria Park Arena was designed by Canadian Mitchell Associates of Bramalea and built by Arlean Construction in 1965 and 1966 to provide a hockey rink that served Bramalea and adjacent neighbourhoods. Original plans and elevations for the Arena are included in Appendix D. The Arena reflected the same mid-century modern design aesthetic adopted by the surrounding residential subdivisions, supporting and complementing the character of the area. The mid-century modern design aesthetic is characterized by the rectangular shape of the building with a modestly slopped gable roof with large overhangs, wood paneled soffits and rectangular windows. The design aesthetic is also apparent in the geometric configuration of the projecting entrance and the arrangement of windows that follows the pattern of the roofline. The method of using glulam (laminated) beams mounted to concrete pillars which also reflected this modern aesthetic, was not used before according to the construction firm's foreman, Bill Gustaveson (Bramalea Guardian, 1966). The concept of glued laminated timber construction was first used in Europe in the early 1890s, and was patented in 1901. The introduction of water-resistant phenol-resorcinol adhesives in 1942 allowed for glulam beams to be exposed to exterior elements (APA, 2018). While the glulam beams were not a new construction technique, it was likely that Bill Gustaveson was indicating that the Arena was an early use of glulam beams supported by concrete pillars in Ontario.

The Victoria Park Arena, which was also known as the Bramalea Arena and the Chinguacousy Township Arena, hosted 40 hockey teams annually during the winter seasons soon after it was constructed. Notably it was home to the Bramalea Blues, a hockey teams that formed in 1972 and joined the Metro Junior "B" league. In 1978 the Bramalea Blues won the Ontario Winter Games hockey competition in Kingston Ontario. In 1991, the Metro league, along with the Bramalea Blues, went Junior "A". The Bramalea Blues folded after the 2008-2009 season. Over the years, the Victoria Park Arena was a training ground for many players that succeeded to the National Hockey League including Michael Cammalleri, Tom Laidlaw, Tyler Seguin and Sean Monahan (Rogers, 2018). In addition to hockey, the Arena was also occasionally used for lacross and curling.

Notably in the 1970s, the City of Brampton organized the *NITTYGRITTYBRAMACHINGWINGDING* at Victoria Park, an annual outdoor carnival festival that had carnival rides, a corn roast, and beer garden in the Arena.

The 1974 *Topographic Map* (Figure 9) identifies the expansion and development of Bramalea as a whole and identifies the footprint of Victoria Park Arena on the subject property as well as a footprint that may be the current daycare building. This map also clearly depicts the park's role as a barrier between the residential development to the north and the industrial buildings to the south of the property.

In 2003, Victoria Park Arena was named in honour of James F McCurry to commemorate his successful career as the Director of Recreation in the City of Brampton.

## **4 EXISTING CONDITIONS**

The subject property is located at 20 Victoria Crescent on the north side of Victoria Crescent within the City of Brampton. It is surrounded by residential properties to the north most of which were constructed in the late 1950s and industrial properties to the south. There are no recognized heritage properties adjacent to the subject property.

The subject property is approximately 23-acres, irregularly shaped, and includes the Victoria Park Arena, a Daycare centre, a one-storey building attached to the Victoria Park Stadium, sports fields, walking trails and Spring Creek. The primary structure of interest is the Victoria Park Arena, the front of which is oriented towards the northeast and is visible from Avondale Boulevard.

### 4.1 LANDSCAPE CONDITIONS

Victoria Park Arena is located within Victoria Park (Image 1-Image 4). Northwest of the Arena is a grassed area and Spring Creek which travels roughly parallel to Avondale Boulevard. Southeast of the Arena is a paved parking lot and a one-storey building attached to the Victoria Park Stadium. The daycare centre is located north of the Arena along with a paved parking lot and the sports fields are located south and southeast of the Arena.



Image 1: View of the grassed area northwest of the Arena and Spring Creek.



Image 2: View of the parking lot area and Victoria Park Stadium.



Image 3: View of the Daycare Centre.



Image 4: View looking southeast from the daycare parking lot towards the soccer fields.

### 4.2 THE ARENA: EXTERIOR

Victoria Park Arena is oriented with its front facade facing Avondale Road at an angle. The Arena is a rectangular shaped building with a gable roof supported by glulam beams on angular concrete pillars, parts of the glulam beams are exposed on the exterior of the building under the eaves overhang. The eaves overhang also reveals wood fascia and soffits which demonstrate fire damage towards the rear of the Arena. The Arena's gable roof is clad with asphalt shingles. The foundation of the Arena consists of concrete block painted a rust colour and the walls of the Arena are clad in a red-brown rug-brick veneer, all the windows are metal framed and painted the same rust colour. The use of rust coloured paint is continued on the angled concrete pillars supporting the glulam beams.

The front elevation includes the gable end of the building and a central one-storey projecting portion, the interior of which contains stairs and the front entrance (Image 5-Image 9). This elevation is symmetrically arranged with two metal double door entrances with glass transoms on either side of the projecting portion. There is also a central metal door painted blue, but this appears to lead to a storage area (Image 9). This elevation is dominated by long, vertically oriented metal frame windows that are currently boarded up. Photographs of the Arena before the fire in 2016 demonstrate the windows on each sloped side of the projecting portion provided views to staircases leading to the second storey viewing area. Above the one-storey projecting portion, the Arena's name 'James F McCurry Victoria Park Arena' is attached under the gable end and consists of a geometric rust coloured background with simple white lettering (Image 10). A slight difference between the original lettering (Victoria Park Arena) and the 'James F. McCurry' lettering added in 2003 is noticeable.

The side elevations are almost identical to each other and demonstrate the angular concrete pillars supporting the glulam beams and the deep overhang of the gable roof (Image 11-Image 16). The walls along the side elevations have painted concrete block foundation and red-brown rug-brick cladding. The main part of the walls with the brick cladding protrude from the concrete block foundation. At the top of the wall is a row of square metal framed windows, some of which are boarded with plywood. At the front end of both side elevations, the rug-brick cladding extends to the ground and there is a metal door and three small horizontally oriented rectangular windows, which are boarded with plywood.

Unlike the northwest oriented side elevation, off the southeast oriented side elevation towards the back of the building, there is a wire fenced section and a wood fenced section.

The rear elevation is oriented southwest and consists of a painted concrete block wall with what appears to be three concrete block additions but may be original to the building. The concrete block on this elevation is painted the same rust colour used throughout the building. The additions are of simple construction, with two having flat roofs and one having a gable roof. The additions include a number of doors, some of which are

currently boarded up, and a garage door opening in the gable roof addition. A large piece of equipment associated with the refrigeration system for the ice rink is located atop the central rear addition. At the northmost corner of the rear elevation there is a small shed attached to the building as well as a double door entrance above a wood set of stairs.



Image 5: View of Victoria Park Arena from Avondale Road.



Image 6: View of the front elevation of Victoria Park Arena.



Image 7: View of the projecting portion on the front elevation of Victoria Park Arena.



Image 8: View of the concrete pillar supporting the glulam beam, note all concrete pillars are of this shape, but the other concrete pillars are partially enclosed inside the building.



Image 9: View of the front elevation of Victoria Park Arena prior to the fire dated February 19, 2016 (City of Brampton, 2020).



Image 10: View of the sign on the front elevation of Victoria Park Arena.



Image 11: View of the northwest side elevation.



Image 12: View of the southeast side elevation.



Image 13: View of a section of the northwest side elevation.



Image 14: View of the front section of the northwest side elevation.



Image 15: View of the front section of the southeast side elevation.



Image 17: View of the rear elevation of Victoria Park Arena.



Image 19: View of the southeast side of one of the rear additions.



Image 16: View of the southeast side elevation towards the rear of the building.



Image 18: View of the rear elevation from the southmost corner.



Image 20: View of the southwest side of one of the rear additions.



Image 21: View of a door between two rear additions.



Image 22: View of two of the rear additions.



Image 23: View of the gable roof rear addition with garage door.



Image 24: View of a small shed attached to the rear elevation.



Image 25: View of the stairs and door at the northmost corner of the rear elevation.

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### 4.3 THE ARENA: INTERIOR

A brief description of Victoria Park Arena's interior is provided and is supplemented by some photographs of the Arena's interior before the fire for documentation purposes.

The interior of the arena includes a front entryway on the ground floor, a viewing area on the second floor, the former ice rink, changerooms, concessions and various utility rooms (Image 26-Image 33). Photographs taken before the fire in February 2016 identify the ice rink located centrally in the room, surrounded by bleachers and the concrete pillars painted yellow supported the glulam beams. Recent photographs of the ice rink demonstrate the fire damage to the roof and glulam beams.



Image 26: View of the former ice rink, looking northeast.

Image 27: View of the bleachers.



Image 28: View of the ice rink in February 2016, prior to the fire (City of Brampton, 2020).



Image 29: View of the bleachers in February 2016, prior to the fire (City of Brampton, 2020).



Image 30: View of the stairs at the front of the building leading to the viewing area on the second floor.



Image 32: View of the concession stand in the Arena.



Image 31: View of double door at the front of the building.



Image 33: View of another concession stand in the Arena.

## 4.4 ARCHITECTURAL STYLE: MID-CENTURY MODERN

The mid-century modern architectural style, also known as modernist, machine age or '50s Contempo came about after World War II and was popular until the mid-1960s (Kyles, n.d; Blumenson, 1990). The style is characterized by long linear roofs with low pitches and horizonal lines. The roofs often projected well beyond

Victoria Park Arena HIA Project No: 209-00238-00 City of Brampton WSP February 2021 Page 27 walls, exposing spaced steel or timber beams as well as creating covered patio areas, decks and carports. When needed these overhanging roofs were supported by extending one supporting wall or by thin columns or posts (Blumenson, 1990). These buildings are also characterised by rectangular windows, often smaller windows placed according to the function of the interior. Typical finishes of these buildings include brick, stone, horizontal and vertical siding and often include a mixture of these materials.

Many of the hallmarks of mid-century modern architecture are visible in the design of the Victoria Park Arena. These hallmarks include the long, linear and low-pitched gable roof and the projection of the roof over the eaves such that it must be supported by concrete pillars. The concept of the exposed glulam beams under the soffits is consistent with the steel and timber beams often found on residential mid-century modern structures. Furthermore, the use of small rectangular windows that were arranged according to the interior function of the Arena along the side elevations and along the stairs on the front elevation also reflect the midcentury modern aesthetic. Lastly, the use of brick is also typical of mid-century modern style.

## **5 PROPOSED NEW DEVELOPMENT**

## 5.1 NEW RECREATIONAL CENTRE

While Victoria Park Arena is a valued local community asset that was part of the original development of Bramalea as a satellite city, its extensive damage caused by a fire that occurred in 2016 brought the City of Brampton to its decision to replace the facility. The replacement recreational facility will be able to address current standards, including but not limited to the *Accessibility for Ontarians with Disabilities Act, Ontario Building Code,* technological advancements and needs of both the sports communities (ie. Hockey, lacrosse, curling, etc.) and the local community, but the intent is to recognize and respect the value of the original Victoria Park Arena to the local community by incorporating salvaged materials that reflect its quintessential architecture into the new development. The development plans for the new recreational centre are currently underway.

### 5.2 IMPACTS & MITIGATION MEASURES

While the subject property is neither listed on the Municipal Heritage Register nor designated under the *Ontario Heritage Act*, the Victoria Park Arena has served the local community since 1966 and is of value for its social and recreational role within the community. Furthermore, this scoped HIA has not included an evaluation under Ontario Regulation 9/06, but it is observed that in addition to the social and recreational value, the Victoria Park is also notable for its mid-century modern aesthetic (Section 4.4 and 5.4) which contributes to the character of Bramalea that was established in 1957 and developed in the late 1950s into the 1960s.

Given that the City of Brampton has confirmed that the Victoria Park Arena has community value, WSP has worked with the City to outline mitigation measures to reduce the impact of this building's loss and to continue to express the Arena's history and community value. These include:

- Submission of a copy of this scoped Heritage Impact Assessment to the Peel Art Gallery Museum and Archives and the local library's local history section to provide a documentary record of the Victoria Park Arena.
- Salvage of unique and distinct architectural features and reuse in the new recreational facility.
- Installation of an interpretive plaque or display within the new recreational facility.

## 5.3 EVALUATION OF MITIGATION MEASURES

### **Table 1: Evaluation of Mitigation Measures**

OPTION	ADVANTAGES	DISADVANTAGES	ADDITIONAL COMMENTS
Submission of a copy of this scoped Heritage Impact Assessment to the Peel Art Gallery Museum and Archives and the local library's local history section to provide a documentary record of the Victoria Park Arena.	This is consistent with best practice to create an accessible record of the former resource that will be demolished or significantly altered. This option is also consistent with the City's <i>Official Plan</i> policies (S. 4.10.1.13) that require documentation and preparation of mitigation measures when demolition is inevitable.	None.	This report can also be distributed to other relevant agencies for documentation purposes as the City of Brampton deems fit.
Salvage of unique and distinct architectural features and reuse in the new recreational facility.	When it is not possible to retain a cultural heritage resource, salvage of attributes of significance is appropriate. The City's <i>Official Plan (</i> S. 4.10.1.13) does briefly acknowledge that salvage may be inevitable for some properties and requires thorough documentation to accompany it. This is also consistent with the Committee of Council's direction provided on May 29, 2019 to salvage and reuse significant heritage features.	There are few drawbacks to salvaging significant architectural features where the demolition of a building is inevitable. However, salvaged items should be thoughtfully incorporated into the new recreational facility and should be accompanied by an interpretation plaque or display.	Thoughtful incorporation of the salvaged attributes is vital. Appropriate thoughtful and meaningful incorporation will depend on the salvaged attribute itself (see section 6.4 for more detailed discussion). The interpretation plan may include a display or plaque, something that clearly identifies which items are salvaged and why they were salvaged.

Interpretive plaque or display within the new recreational facility.	An interpretation plaque or display is essential when salvaging and reusing significant attributes from cultural heritage resources so that their meaning, significance and history is not lost overtime.	None.	See Section 6.4 for more discussion on an interpretation plaque or display.
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## 5.4 MATERIALS FOR SALVAGE AND INCORPORATION INTO THE NEW RECREATIONAL FACILITY

Based on the history of the Victoria Park Arena, a review of the existing conditions, and discussion with the heritage staff at the City of Brampton, the front glulam beams that have not been damaged by the fire should be salvaged and reused in any new structure, where feasible. In addition, the concrete pillars that support the beams as well as the 1966 date plaque (identifying the Council of Chinguacousy at the time of construction, the Arena's Board members, the consultant architect and the contractors) should also be salvaged and reused, where possible. While there are other elements of the Arena that reflect the mid-century modern aesthetic including the small rectangular windows, and the brick veneer, it is the placement and use of these elements on the overall design of the Victoria Park Arena that together reflect the mid-century modern aesthetic. The glulam beams and concrete pillars are the more defining features that independently of the whole building provide a reference to the mid-century modern aesthetic.

The glulam beams and the concrete pillars that support them define the Victoria Park Arena and were a construction technique new to Canada in the 1960s. The shape and angle of the concrete pillars along the side elevation of the Arena also provide the distinct and unique look for which the Victoria Park Arena is locally recognized. The glulam beams are partially visible on the exterior but had the biggest visual impact on the interior where the pattern of the laminated wood was brought out by a warm stain.

The Concrete pillars supporting the glulam beams are precast and appear to sit on a concrete footing below grade, but how they are connected to the footing is unknown (Appendix D). Thoughtful incorporation of the concrete pillars and glulam beams should place these features preferably at the entrance to the facility, but at least in a public space where they can be seen and admired. Consideration should also be given to the fact that most of the glulam beams have been inside the facility since 1966 and, if possible, they should be afforded a similar condition in the new design. If salvage of the concrete pillars is not physically possible or feasible it could be possible to replicate the pillars. While this option is less preferred than salvaging the original pillars due to the loss of original integrity, it would be possible to accurately replicate the pillars with modern techniques, noting publicly that they were reproductions.

Additionally, the 1966 date plaque is a key feature that should be included in any interpretive display inside the new recreational facility. The interpretive display should be located in a heavily trafficked, publicly accessible space. At a minimum this interpretive display should identify the location of the Victoria Park Arena, include a summary of its history and identify the salvaged materials used in the new recreational facility. There is also an opportunity to include history about the land-use planning vision of Bramalea as a Satellite City in the 1950s and 1960s and the role that the Park and Arena played in this vision. The display could also include memories of the facility from previous athletes that played there, historic photographs of the facility and teams and include space for continued recording of the new facility's history. Details on this interpretive display would benefit from consultation with the public for suggestions.

As the Arena will be demolished aside from the salvaged items, the new design of the recreational facility will not require the same approach as a new build that incorporates an intact cultural heritage resource into a new facility. While the new recreational facility should incorporate the salvaged materials recommended, as a

new build it should seek to reflect contemporary architectural styles and values instead of seeking to recreate or mimic the former Arena's style that was contemporary to the 1960s. Some options to consider include use of the same materials (i.e. Concrete, laminated wood) intermingled with additional contemporary materials and/or replication of the shape of the concrete pillars and/or glulam beams in contemporary materials. There may be additional creative measures that arise through the design process that also effectively create cohesion between the salvaged items and the design of the new facility.

## 6 RECOMMENDATIONS

The Victoria Park Arena has been an important social and recreational hub since its construction in 1966. Damaged by a fire in 2016, the City of Brampton's City Council has voted to replace the facility with a new recreational facility that will meet current standards, including but not limited to the *Accessibility for Ontarians with Disabilities Act* and the *Ontario Building Code* and to satisfy the contemporary needs of sports communities (hockey, lacrosse, curling, etc.) and local community use (ie. Community events).

The following recommendations to mitigate the impact of the loss of Victoria Park Arena include:

- 1 That a copy of this scoped Heritage Impact Assessment be submitted to the Peel Art Gallery, Museum and Archives (PAMA) and the Brampton Library's local history section to provide a documentary record of the Victoria Park Arena.
- 2 That unique and distinct architectural features be salvaged including:
  - a The front section of glulam beams that do not have significant fire damage;
  - b The concrete pillars supporting these glulam beams; and,
  - c The 1966 date plaque.
- 3 That salvaged materials be thoughtfully and meaningfully incorporated into the new recreational facility.
- 4 That an interpretive plaque or display be installed in the new recreational facility in a highly trafficked, publicly accessible space.

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# APPENDIX A FIGURES 2-9



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# APPENDIX B QUALIFICATIONS OF AUTHOR

### wsp

#### **Chelsey E. Tyers**, BES, MCIP, RPP CULTURAL HERITAGE SPECIALIST

Years with firm - 2 Years of experience -9

#### AREAS OF PRACTICE

Cultural Heritage Assessments Heritage Planning Heritage Designation Heritage Conservation Districts

#### **EDUCATION**

BES, Land Development Planning Specialization, Honours Planning Co-op, University of Waterloo, 2011

#### CAREER

Cultural Heritage Specialist, WSP, 2018 – present

Cultural Heritage Planner Planning Development & Heritage Design, City of Hamilton, 2014-2018

Policy Planner (Heritage), Policy Planning, City of Brantford, 2014

Planner II / Heritage Coordinator, Planning and Development, Township of King, 2013-2014

Planner, Heritage & Urban Design, City of Kingston, ON, 2012-2013

Application Technician, Committee of Adjustment, City of Toronto, 2011-2012

Heritage Documentation Specialist (Co-op Position), Historic Places Initiative, Waterloo, ON, 2008-2009

#### Profile

Ms. Tyers is a Cultural Heritage Specialist for WSP. She previously worked as Heritage Planner in fast-paced municipal environments for over eight years. She provides a variety of cultural heritage services including historical research, evaluation and analysis of cultural heritage resources, evaluation of complex development applications and facilitation through the heritage permit process.

As a municipal heritage planner Ms. Tyers gained experience managing and evaluating cultural heritage resources including seven heritage conservation districts, and a wide variety of cultural heritage resources ranging from single detached dwellings, to evolved industrial cultural heritage landscapes. She also evaluated heritage permits, prepared reports for municipal councils and worked closely with the municipal heritage committees. Ms. Tyers also managed the commencement of the of the St. Clair Boulevard HCD Update including initial public consultation and project organization.

Ms. Tyers' experience as a heritage consultant has included the environmental assessment process completing CHRAs, CHERs, HIA and Cultural Heritage Documentation Reports for a variety of public sector clients including the City of London, City of Toronto, Region of Peel and more. Additionally, Ms. Tyers has completed several Heritage Impact Assessments for private clients and provided heritage planning consulting services for the City of Cambridge including review of heritage permits in HCDs.

#### Select Relevant Experience

Cultural Heritage Resource Assessments

- Hopkins Bay EA, Ramara Township, ON (2020): Conducted historical research for the study area including historic map review, reviewed potential heritage resources in the study area and prepared report with findings.
- Concord GO Environmental Assessment, Vaughan, ON (2019): Conducted historical research for the study area including historic map review, conducted field review identifying potential cultural heritage resources and prepared report with preliminary impact assessment.
- Lower Simcoe GO Environmental Assessment, Toronto, ON (2019): Conducted historical research for the study area including historic map review, conducted field review identifying potential cultural heritage resources and prepared report with preliminary impact assessment.

#### Cultural Heritage Evaluation Reports

- Wharncliffe Road South CN Subway, London, ON (Ongoing): Conducted thorough historical research for study area, evaluated bridge according to Ontario Regulation 9/06 and provided thorough photographic documentation for archival purposes.
- 69 Wharncliffe Road South, London, ON (Ongoing): Conducted thorough historical research for study area, evaluated bridge according to Ontario Regulation 9/06 and provided appropriate recommendations for next steps in the Environmental Assessment process.
- Grantham Rail Bridge, Cambridge, ON (Ongoing): Conducted through historical research for the rail bridge, evaluated bridge according to Ontario Regulation 9/06 and prepared a Statement of Cultural Heritage Value or Interest.

- University Drive Bridge, London, ON (2019): Conducted thorough historical research for study area, evaluated bridge according to Ontario Regulation 9/06 and provided appropriate recommendations for next steps in the Environmental Assessment process.
- Clark's Bridge, London, ON (2019): Conducted thorough historical research for study area, evaluated bridge according to Ontario Regulation 9/06 and provided appropriate recommendations for next steps in the Environmental Assessment process.
- 1110 Richmond Road, London, ON (2018): Conducted thorough historical research for subject property, evaluated bridge according to Ontario Regulation 9/06 and provided appropriate recommendations for next steps in the Environmental Assessment process.

#### Heritage Impact Assessments

- Beaconsfield Avenue, Wortley Village/Old South HCD, London, ON (2019): Evaluated potential impact to heritage attributes as expressed in the HCD Plan and recommended appropriate mitigation measures.
- 98 Stanley Street, London, ON (2019) [CHER and HIA]: Conducted thorough historical research for study area, evaluated property according to Ontario Regulation 9/06, assessed the potential impact to the heritage attributes and recommended appropriate mitigation measures.
- 20 Milton Trail, Milton (2020): Conducted thorough historical research for the subject property, identified existing conditions, evaluated property according to Ontario Regulation 9/06 and 10/06 in accordance with the Town of Milton's HIA terms of reference, assessed the potential impact to heritage attributes and recommended appropriate materials for salvage.
- 12250 Centreville Creek Road, Caledon (2020): Conducted thorough historical research for the subject property, identified existing conditions, evaluated property according to Ontario Regulation 9/06, prepared statement of cultural heritage value or interest, assessed the potential impact to heritage attributes and recommended alternatives that would best conserve the identified heritage attributes and cultural heritage landscape.
- 14045 Airport Road, Caledon (2020): Conducted thorough historical research for the subject property, identified existing conditions, evaluated property according to Ontario Regulation 9/06, prepared statement of cultural heritage value or interest, assessed the potential impact to heritage attributes and recommended alternatives that would best conserve the identified heritage attributes and cultural heritage landscape.
- Willow Lane Bridge/Culvert, Meadowvale Village HCD, Mississauga, ON (Ongoing). Evaluated impacts of bridge rehabilitation to the heritage attributes expressed in the HCD Plan and recommended appropriate mitigation measures.
- Heritage Documentation and Salvage
  - Winston Churchill and Olde Base Line Road, Caledon, ON (2019-2020): As part of the Environmental Assessment process for road reconstruction, thoroughly documented the nineteenth century stone walls and wooden fences through the study area, identifying opportunities for relocation where possible



## C SCOPED HIA TERMS OF REFERENCE

### Heritage Impact Assesment Terms of Reference

\*Highlighted portions of the following terms of reference identify the requirements for this scoped HIA.





Planning, Design and Development Heritage



#### Heritage Impact Assessment - Terms of Reference

A Heritage Impact Assessment (HIA) is a study to determine the impacts to known and potential heritage resources within a defined area proposed for future development. The assessment results in a report that identifies all heritage resources, provides an evaluation of the significance of the resources, outlines any impact proposed development or site alteration will have on the resources, and makes recommendations toward conservation methods and/or mitigative measures that would minimize impacts to those resources. The report will be used to help the municipality make informed decisions related to the identified heritage resources.

#### 1. Background

The requirement to provide a Heritage Impact Assessment is derived from the *Ontario Heritage Act* O. Reg. 9/06, Section 2(d) of the *Planning Act*, Section 2.6 of the Provincial Policy Statement, and Section 4.9 of the City of Brampton's Official Plan.

According to Section 4.9.1.10 of the Official Plan:

A Heritage Impact Assessment, prepared by a qualified heritage conservation professional, shall be required for any proposed alteration, construction, or development involving or adjacent to a designated heritage resource to demonstrate that the heritage property and its heritage attributes are not adversely affected. Mitigation measures and/or alternative development approaches shall be required as part of the approval conditions to ameliorate any potential adverse impacts that may be caused to the designated heritage resources and their heritage attributes.

Official Plan Policy 4.9.1.11 states that:

A Heritage Impact Assessment may also be required for any proposed alteration work or development activities involving or adjacent to heritage resources to ensure that there will be no adverse impacts caused to the resources and their heritage attributes. Mitigation measures shall be imposed as a condition of approval of such applications.

Official Plan Policy 4.9.1.12 outlines and prioritizes preferred mitigation options starting with onsite retention.

In addition, Official Plan Implementation Policy 4.9.9.2 (ii) allows for:

Requiring the preparation of a Heritage Impact Assessment for development proposals and other land use planning proposals that may potentially affect a designated or significant heritage resource or Heritage Conservation District.

#### 2. When a Heritage Impact Assessment is Required

2.1 An HIA will be required for the following:

- Any property listed or designated in the municipal heritage register, pursuant to Section 27 (1.1) or (1.2) of the *Ontario Heritage Act* that is subject to land use planning applications;
- Any property listed or designated in the municipal heritage register, pursuant to Section 27 (1.1) or (1.2) of the *Ontario Heritage Act* that is facing possible demolition;
- Any property that is subject to land use planning applications and is adjacent to a property designated in the municipal heritage register, pursuant to Section 27 (1.1) of the *Ontario Heritage Act.*

A HIA may be required for the following:

- Any property that is subject to land use planning applications and is adjacent to a property listed in the municipal heritage register, pursuant to Section 27 (1.2) of the *Ontario Heritage Act.*
- 2.2 A property does not have to be designated or listed in a heritage register to be subject to a Heritage Impact Assessment. Any property that may exhibit cultural heritage value or interest or 'heritage potential' as determined by City heritage staff will be subject to an appropriate level of heritage due diligence and may require an HIA.
- 2.3 Heritage Impact Assessments may be 'scoped' based on the specific circumstances and characteristics that apply to a heritage resource. Further consultation with heritage staff will be required to determine when a scoped HIA may be required, as well as requirements for the content.

#### 3. Content of Heritage Impact Assessments

#### 3.1 Background

- 3.1.1 Provide a background on the purpose of the HIA by outlining why it was undertaken, by whom, and the date(s) the evaluation took place.
- 3.1.2 Briefly outline the methodology used to prepare the assessment.

#### 3.2 Introduction to the Subject Property

3.2.1 Provide a location plan specifying the subject property, including a site map and aerial photograph at an appropriate scale that indicates the context in which the property and heritage resource is situated.

- 3.2.2 Briefly document and describe the subject property, identifying all significant features, buildings, landscapes, and vistas.
- 3.2.3 Indicate whether the property is part of any heritage register (e.g. Municipal Register of Cultural Heritage Resources Designated under the Ontario Heritage Act, or Municipal Register of Cultural Heritage Resources)
- 3.2.4 Document and describe the context including adjacent properties, land uses, etc.
- 3.2.5 Document, describe, and assess the apparent physical condition, security, and critical maintenance concerns, as well as the integrity of standing buildings and structures found on the subject property.
- 3.2.6 If the structural integrity of existing structures appears to be a concern, recommend the undertaking of a follow-up structural and engineering assessment to confirm if conservation, rehabilitation and/or restoration are feasible. Assessments must be conducted by qualified professionals with heritage property experience.
- 3.3 Evaluation of Cultural Heritage Value or Interest
- 3.3.1 Thoroughly document and describe all heritage resources within the subject property, including cultural heritage landscapes, structures, buildings, building elements, building materials, architectural features, interior finishes, natural elements, vistas, landscaping and potential archaeological resources.
- 3.3.2 Provide a chronological history of the site and all structure(s), including additions, deletions, conversions, etc.
- 3.3.3 Provide a list of owners from the Land Registry office and other resources, as well as a history of the site use(s) to identify, describe, and evaluate the significance of any persons, groups, trends, themes, and/or events that are historically or culturally associated with the subject properly.
- 3.3.4 Document heritage resource(s) using current photographs of each elevation, and/or measured drawings, floor plans, and a site map at an appropriate scale for the given application (i.e. site plan as opposed to subdivision). Also include historical photos, drawings, or other archival material that is available and relevant.
- 3.3.5 Using Regulation 9/06 of the *Ontario Heritage Act* (Criteria for Determining Cultural Heritage Value or Interest), identify, describe, and evaluate the cultural heritage value or interest of the subject property as a whole, outlining in detail all significant heritage attributes and other heritage elements.
- 3.3.6 Provide a summary of the evaluation in the form of a table (see Appendix 1) outlining each criterion (design or physical value; historical or associative value; contextual value), the conclusion for each criterion, and a brief explanation for each conclusion.

#### 3.4 Description and Examination of Proposed Development/Site Alterations

- 3.4.1 Provide a description of the proposed development or site alteration in relation to the heritage resource.
- 3.4.2 Indicate how the proposed development or site alteration will impact the heritage resource(s) and neighbouring properties. These may include:
  - o Destruction of any, or part of any, significant heritage attributes or features;
  - Alteration to the historic fabric and appearance;
  - Shadow impacts on the appearance of a heritage attribute or an associated natural feature or plantings, such as a garden;
  - Isolation of a heritage attribute from its surrounding environment, context or a significant relationship;
  - o Impact on significant views or vistas within, from, or of built and natural features;
  - A change in land use where the change in use may impact the property's cultural heritage value or interest;
  - Land disturbances such as a change in grade that alters soils, and drainage patterns that may affect a cultural heritage resource.
- 3.4.3 Submit a drawing indicating the subject property streetscape and properties to either side of the subject lands, if applicable. The purpose of this drawing is to provide a schematic view of how the new construction is oriented and how it integrates with the adjacent properties from a streetscape perspective. Thus, the drawing must show, within the limits of defined property lines, an outline of the building mass of the subject property and the existing neighbouring properties, along with significant trees and/or any other landscape or landform features. A composite photograph may accomplish the same purpose with a schematic of the proposed building drawn in.

#### 3.5 Mitigation Options, Conservation Methods, and Proposed Alternatives

- 3.5.1 Provide mitigation measures, conservation methods, and/or alternative development options that avoid or limit the direct and indirect impacts to the heritage resource.
- 3.5.2 Evaluate the advantages and disadvantages (pros and cons) of each proposed mitigation measure/option. The mitigation options may include, but are not limited to:
  - Alternative development approaches;
  - Appropriate setbacks between the proposed development and the heritage resources;
  - o Design guidelines that harmonize mass, setback, setting, and materials;
  - Limiting height and density;
  - o Compatible infill and additions;
  - Refer to Appendix 2 for additional mitigation strategies.

- 3.5.3 Identify any site planning and landscaping measures that may ensure significant heritage resources are protected and/or enhanced by the development or redevelopment.
- 3.5.4 If relocation, removal, demolition or other significant alteration to a heritage resource is proposed by the landowner and is supported by the heritage consultant, provide clear rationale and justification for such recommendations.
- 3.5.5 If retention is recommended, outline short-term site maintenance, conservation, and critical building stabilization measures.
- 3.5.6 Provide recommendations for follow-up site-specific heritage strategies or plans such as a Conservation Plan, Adaptive Reuse Plan, and/or Structural/Engineering Assessment.
- 3.5.7 If a heritage property of cultural heritage value or interest cannot be retained in its original location, consider providing a recommendation for relocation by the owner to a suitable location in reasonable proximity to its original siting.
- 3.5.8 If no mitigation option allows for the retention of the building in its original location or in a suitable location within reasonable proximity to its original siting, consider providing a recommendation for relocation to a more distant location.
- 3.5.9 Provide recommendations for advertising the sale of the heritage resource. For example, this could include listing the property on the Architectural Conservancy of Ontario (ACO) website in order to allow interested parties to propose the relocation of the heritage resource. Acceptable timelines and any other requirements will be determined in consultation with City staff. The link to the ACOs Historic Architectural Linking Program is provided below:

http://www.arconserv.ca/buildings\_at\_risk/for\_sale.cfm

3.5.10 If a property cannot be retained or relocated, alternatives will be considered for salvage and mitigation. Only when other options can be demonstrated not to be viable will options such as ruinification or symbolic conservation be considered. Detailed documentation and commemoration (e.g. a heritage interpretative plaque) may also be required. Salvage of material must also occur, and a heritage consultant may need to provide a list of features of value to be salvaged. Materials may be required to be offered to heritage-related projects prior to exploring other salvage options.

Ruinfication allows for only the exterior of a structure to be maintained on a site. Symbolic conservation refers to the recovery of unique heritage resources and incorporating those components into new development, or using a symbolic design method to depict a theme or remembrance of the past.

3.5.11 If the subject property abuts to one or more listed or designated heritage properties, identify development impacts and provide recommended mitigation strategies to ensure the heritage resources on the adjacent properties are not negatively impacted. Mitigation strategies include, but are not limited to:

- o vegetation screening;
- o fencing;
- o buffers;
- o site lines
- an architectural design concept for the massing and façade treatment of proposed buildings to ensure compatibility with the adjoining property and the like.
- 3.5.12 An implementation schedule and reporting/monitoring system for implementation of the recommended conservation or mitigation strategies may be required.

#### 3.6 Recommendations

- 3.6.1 Provide clear recommendations for the most appropriate course of action for the subject property and any heritage resources within it.
- 3.6.2 Clearly state whether the subject property is worthy of heritage designation under the *Ontario Heritage Act*.
- 3.6.3 The following questions must be answered in the final recommendation of the report:
  - Does the property meet the criteria for heritage designation under the Ontario Regulation 9/06, *Ontario Heritage Act*?
  - Why or why not does the subject property meet the criteria for heritage designation?
  - Regardless of the failure to meet criteria for heritage designation, can the structure or landscape be feasible integrated into the alteration/development?
- 3.6.4 Failure to provide a clear recommendation as per the significance and direction of the identified cultural heritage resource will result in the rejection of the Heritage Impact Assessment.

#### 3.7 Executive Summary

- 3.7.1 Provide an executive summary of the assessment findings at the beginning of the report.
- 3.7.2 Outline and summarize all recommendations including mitigation strategies, need for the preparation of follow-up plans such as conservation and adaptive reuse plans and other requirements as warranted. Please rank mitigation options from most preferred to least.

#### 4. Standards and Practices

- 4.1 Heritage Impact Assessments must be impartial and objective, thorough and complete, and sound in methodology and application of Ontario heritage evaluation criteria, and consistent with recognized professional standards and best practices in the field of heritage consulting.
- 4.2 Heritage Impact Assessments must be completed to the satisfaction of the City. HIAs that are not completed to the satisfaction of the City may be subject to revision and

resubmission, critique by peer review or a similar process to determine if the report meets recognized standards and practices.

#### 5. Acceptance of Heritage Impact Assessments

- 5.1 The Heritage Impact Assessment will undergo a compliance review by City heritage staff to determine whether all requirements have been met, and to review the option(s) outlined in the report. Staff comments will be provided to the applicant and heritage consultant.
- 5.2 A Heritage Impact Assessment will be considered a 'draft' until such time that City heritage staff deem the report complete. Staff will notify the applicant and heritage consultant when the report is considered complete.
- 5.3 An accepted Heritage Impact Assessment is required for the final processing of a development application. The recommendations within the final approved version of the Heritage Impact Assessment may be incorporated into legal agreements between the City and the proponents at the discretion of the municipality. Until the HIA is deemed complete, schedules associated with planning and building applications related to heritage properties cannot commence.

#### 6. Other Requirements

- 6.1 Provide a bibliography listing <u>all</u> sources used in preparing the HIA.
- 6.2 Provide proper referencing within the HIA, including images, maps, etc.
- 6.3 Provide five copies of the final HIA, and one digital copy (PDF or Word)
- 6.4 Provide a digital copy of all images taken or obtained for the HIA on Compact Disk.
- 6.5 Measured drawings of the heritage resource(s) may be required in support of a conservation plan or as a record prior to demolition.
- 6.6 A site visit of the subject property by City heritage staff and/or members of the Brampton Heritage Board may be required prior to the HIA being deemed complete.

#### 7. Qualified Parties for Preparing Heritage Impact Assessments

- 7.1 All heritage impact assessments, conservation plans, adaptive reuse plans, security plans and/or related studies must be prepared by qualified professionals with applied and demonstrated knowledge of accepted standards of heritage conservation, historical research, identification, evaluation of cultural heritage value or interest, mitigation, and the like.
- 7.2 All heritage consultants submitting heritage impact assessments must be members in good standing of the Canadian Association of Heritage Professionals (CAHP).

7.3 Under provincial law only licensed, professional archaeologists may carry out archaeological assessments using specific provincial standards and guidelines.

#### 8. Scope of a Conservation Plan

- 8.1 If a property is to be retained, a follow-up Conservation and Adaptive Reuse Plan may be recommended. Conservation and Adaptive Reuse Plans will provide:
  - o Preliminary recommendations for adaptive reuse;
  - Critical short-term maintenance required to stabilize the heritage and building fabric and prevent deterioration;
  - Measures to ensure interim protection of heritage resources during phases of construction or related development;
  - o Security requirements;
  - Restoration and replication measures required to return the property to a higher level of cultural heritage value or interest integrity, as required;
  - Appropriate conservation principles and practices, and qualifications of contractors and trades people that should be applied;
  - Longer term maintenance and conservation work intended to preserve existing heritage fabric and attributes;
  - 'As found' drawings, plans, specifications sufficient to describe all works outlined in the Conservation Plan;
  - An implementation strategy outlining consecutive phases or milestones;
  - Cost estimates for the various components of the plan to be used to determine sufficient monetary amounts for letters of credits or other financial securities as may be required to secure all work included in the Conservation Plan; and
  - Compliance with recognized Standards and Guidelines for the Conservation of Historic Places in Canada, the Appleton Charter for the Protection and Enhancement of the Built Environment and other recognized heritage protocols and standards.

#### Evaluation of Cultural Heritage Value or Interest Summary Table

Criteria for Determine Cultural heritage value or interest	Assessment (Yes/No)	Rationale
1. Design or physical value:		
a) Is a rare, unique, representative or		
early example of a style, type,		
expression, material, or construction		
method		
b) Displays a high degree of		
craftsmanship or artistic merit		
a) Domonatratos a high dogras of		
c) Demonstrates a high degree of technical or scientific achievement		
2. Historical or associative value:		
a) Has direct associations with a		
theme, event, belief, person, activity,		
organization, or institution that is		
significant to a community		
b) Yields, or has potential to yield,		
information that contributes to an		
understanding of a community or		
culture		
c) Demonstrates or reflects the work		
or ideas of an architect, artist, builder, designer or theorist who is significant		
to a community		
3. Contextual value:		
a) Is important in defining,		
maintaining, or supporting the		
character of an area		
b) Is physically, functionally, visually,		
or historically linked to its		
surroundings		
c) Is a landmark		

#### Appendix 2

#### Additional Mitigation Strategies

If any negative impacts are identified, a mitigation plan must be outlined. A mitigation plan will be tailored to the unique conditions and cultural heritage value or interest of a given property. The following list represents a summary of the more common types of mitigation that may be appropriate:

- Avoidance protocols to isolate development and land alterations to minimize impacts on significant built and natural features and vistas;
- Architectural design guidelines for buildings on adjacent and nearby lots to help integrate and harmonize mass, setback, setting, and materials;
- o Limiting height and density of buildings on adjacent and nearby lots;
- Ensuring compatible lotting patterns, situating parks and storm water ponds near a heritage resource;
- Allowing only compatible infill and additions;
- Preparation of conservation plan and adaptive reuse plans as necessary;
- Vegetation buffer zones, tree planting, site plan control, and other planning mechanisms;
- Heritage Designation, Heritage Conservation Easement;
- In certain rare instances, permitting the relocation of built heritage resources within the subject parcel, to nearby lands, or to other parts of the City in order to better accommodate conservation and adaptive reuse. The appropriate context of the resource must be considered in relocation.
- In instances where retention may not be possible, partial salvage, documentation through measured drawings and high-resolution digital photographs, historical plaquing and the like may be appropriate.
- Opportunities to commemorate historical land uses, past owners, landscape and landform features through the naming of streets and other public assets such as parkettes and storm ponds; interpretative plaques may also be required.

**APPENDIX** ORIGINAL PLANS AND **ELEVATIONS** FOR VICTORIA PARK ARENA

## TOWNSHIP OF CHINGUACOUSY

CONTRACT FOR THE CONSTRUCTION OF THE

## VICTORIA PARK ARENA

CONTRACT Nº 11-65-P

LIST OF CONTRACT DRAWINGS

P-1 SITE PLAN AND S	SERVICES	M-1	MECHANICAL -	PLUMBING AND DRAINAGE FLOOR FLANS
A-1 ARCHITECTURAL -	FIBST FLOOR PLAN	M - 2	MECHANICAL -	HEATING AND VENTILATING GROUND FLOOF.
A-2 ARCHITECTURAL -	SECOND FLOOR PLAN	M-3	MECHANICAL	HEATING AND VENTILATING SECOND FLOOR
A-3 ARCHITECTURAL -	ELEVATIONS	E - I	ELECTRICAL -	PLOT PLAN AND DETAILS
A-4 ARCHITECTURAL -	DETAILS I	E - 2	ELECTRICAL -	GROUND FLOOR PLAN AND DETAILS
A-5 ARCHITEGTURAL -	DETAILS I	E -3	ELECTRICAL -	SECOND FLOOR FLAN AND DETAILS
A-6 ARCHITECTURAL -	DOOR AND ROOM FINISH SCHEDULE			
S-I STRUCTURAL -	FOUNDATION PLAN			
S-2 STRUCTURAL -	FOOTING DETAILS			
S-3 STRUCTURAL -	ROOF AND SECOND FLOOR FRAMING			
S-4 STRUCTURAL -	EQUIPMENT FOUNDATIONS AND MISCELLANE	OUS, STEEL		



PROJECT 781















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