

**HERITAGE IMPACT ASSESSMENT:  
YORK ROAD ENVIRONMENTAL DESIGN STUDY,  
GUELPH, ONTARIO**

**PROJECT NUMBER: TP115100**

Prepared for:



**Revised August 2019**

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**Project Number: TP115100**

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## Executive Summary

Wood Environment & Infrastructure Solutions, a Division of Wood Canada Limited (Wood), was retained by the City of Guelph ("CLIENT") to conduct a Heritage Impact Assessment (HIA) as part of the Environmental Design Study for York Road Improvements, Wyndham Street South to East City Limits. A Schedule C Class Environmental Assessment had been undertaken in accordance with the Municipal Class Environmental Assessment planning and design process approved by City council in 2007 (Appendix A: Figure 1–3).

The City of Guelph completed the 2007 York Road Improvements Class EA to identify transportation improvements to address the travel needs on York Road between Wyndham Street South and the East City Limits. The need for road improvements on York Road was identified in the Guelph Wellington Transportation Study (GWTS) that was completed in 2005. The impetus for these improvements originates from the proposed development of the Guelph Innovation District (OPA 54) Secondary Plan south of York Road, east of the CP rail line. This area was previously referred to as the Ontario Correctional Institute Lands.

While the cultural heritage of the entire study area along York Road from Victoria Road to East City Limit was reviewed in a Wood memorandum of January 2016, this Heritage Impact Assessment will focus on the area of the Guelph Correctional Centre at 785 York Road that would be impacted by the widening of York Road and the realignment of Clythe Creek. This report is to be read as an appendix to the EIS.

The memorandum of January 2016 contained:

- ▶ A summary of heritage concerns identified in previous reports: the 2005 York District Land Use & Servicing Study: Background Report; the 2007 York Road Improvements Wyndham Street South to East City Limits Class Environmental Assessment; a Preliminary Heritage Easement Assessment by the Ontario Heritage Trust Staff; a Cultural Heritage Assessment Report by the Ontario Realty Corporation; and the Official Plan Amendment 54 (Guelph Innovation District Secondary Plan [GID]) for the City of Guelph Official Plan.
- ▶ A recommendation for additional heritage research including a Heritage Impact Assessment.
- ▶ Determination of potential impacts on the identified heritage attributes with recommendations and/or mitigation.

Located within the study area is Clythe Creek, which is proposed to be relocated to permit the widening of the roadway and to create a channel that can convey higher flows, typical of 1.5 to 2-

year storm events. The creek realignment and rehabilitation would improve the natural functions of the creek and enhance floral and faunal habitats. The creek channel would be realigned south from the York Road right-of-way and the connection to the floodplain would be upgraded.

Cultural heritage resources of local and provincial significance have been identified within the study area. This report takes potential impacts to these resources into consideration within the framework of the preferred design alternative.

The background research was conducted by Ms. Linda Axford. The heritage property inspection of the entire study area between Wyndham Street south and the East City Limit was conducted on December 4, 2015. Further investigations for the Heritage Impact Assessment at 785 York Road along the Guelph Correctional Centre frontage near the roadway were undertaken on October 28, November 1, and November 22, 2016. The weather was cool and overcast during all four property reviews and did not impede the inspections in any way.

The proposed roadway widening has the potential to impact cultural heritage resources in a variety of ways. These include the loss or displacement of resources through removal or relocation and the disruption of resources by introducing physical, visual, audible or atmospheric elements that are not in keeping with the heritage resources and/or their setting.

On December 20, 2017, Wood presented the City of Guelph with Road Alternatives 1 and 2. Pursuant to a Memo sent to the City of Guelph on April 5, 2018, Wood was requested to provide two additional roadway design alternatives. The objective of investigating these two new alternatives was to determine if the multi-use pathways could be maintained adjacent to York Road through either narrowing the multi-use pathway or relocating the built heritage features at the Reformatory Entrance. The two new alternatives are as follows:

Alternative 3: Eliminate the boulevards and narrow the multi-use pathways on both the north and south sides of York Road to 2.5 m adjacent to the Reformatory Property entrances.

Alternative 4: Eliminate the boulevards, maintain 3.0 m multi-use pathways on both the north and south sides of York Road, and relocate the heritage wall outside of the clear zone.

The effects of these two new alternatives is limited to the section of York Road between the western entrance to Royal City Jaycees Park (east of the existing Elizabeth Street intersection), and east of the Reformatory Property entrance where the multi-use path had been located south of

the Clythe Creek in the original Environmental Design Study (March 2017 submission). At the December 20, 2017 meeting, the City of Guelph indicated that the recently approved *Active Transportation Network Study Update* (June 2017) requires that active transportation facilities must (where feasible) provide the same level-of-service as non-active modes of transportation. Locating the multi-use path south of Clythe Creek would place it within the floodplain and make it unusable during moderate to significant storm events (>2-year frequency), therefore significantly compromising its level of service relative to the roadway. Therefore, as indicated by the City at the December 20, 2017 meeting, it is preferred that the multi-use path be located adjacent to the road.

Also, at the December 20, 2017 meeting and pursuant to an email on April 23, 2018, the City of Guelph Senior Heritage Planner, Steven Robinson indicated that he was not opposed to the curved, stone wing walls on both sides of the main entrance to the Correctional Centre being carefully dismantled and relocated and reconstructed further south. He also stated in the April 23<sup>rd</sup> email that, before he could give a full support, this option would need to include the creation and approval of a Conservation Plan.

Accordingly, only Alternative 4 will be discussed in this revised report. The Alternative 4 road design would eliminate the boulevards and provide full 3.0-m wide multi-use paths on both the north and south sides of York Road from Beaumont Avenue to east of the Reformatory property. Unlike earlier alternatives, Alternative 4 includes relocation of the former Reformatory entrance gateway features/walls to beyond the limits of the 6.5-m roadway clear zone. Relocation of the main entrance wing walls would provide additional space for snow storage and utilities, while eliminating the need to provide a guiderail along the roadway adjacent to the heritage features. A benefit of the relocation and reconstruction of both wing walls would also uncover and restore the walls' original height. The wing wall on the east side of the entranceway would be reconstructed in roughly the same location, with an extension on the east end of 7 m so that the end treatment would not conflict with the existing in-water feature. An additional advantage of rebuilding the east portion of the wing wall would be that it was more visible to the public, and it would be similar in height to the original wall. The relocation of the wing wall on the west side of the entranceway would move the wall further south so that it would be outside of the clear zone (Drawing 1). Relocation and reconstruction of both wing walls would also uncover and restore the walls' original height. Relocation of the wall would need to be undertaken by skilled heritage masons and would require additional embankment grading and the use of retained soil systems (or retaining walls) between the heritage wall and the creek.

In order to optimize the available space within the right-of-way, the roadway alignment would be shifted 1.5 m to the north relative to the design presented in the draft EIS dated March 2017. The road profile has also been adjusted to minimize grading impacts on adjacent properties. Similar to the design presented in the draft EIS, extension of the Hadati Creek culvert would be required, and opportunities to reduce impacts to the creek and heritage features through implementation of various segments of retaining walls/soil systems could be investigated as part of detailed design.

As indicated throughout this report, the Guelph Correctional Centre is a very important cultural heritage landscape. Through the convergence of two large reform movements, namely prison reform and the City Beautiful reform concept, this cultural heritage landscape is unique in its value and interest in the Province of Ontario. The heritage impacts to the listed built heritage resources are all considered important due to their proximity to the roadway or to the creek realignment.

Accordingly, it is recommended that the following mitigation measures be taken:

- 1) Since preservation in situ is not feasible for all of the heritage resources, rehabilitation, adaptive reuse and restoration must be done in a sensitive manner in order to protect the site's heritage value.
- 2) It is recommended that a Conservation Plan be prepared during the detailed design plan phase for improvements to York Road. A Conservation Plan would be prepared by a qualified heritage consultant and would guide the work of relocating the built heritage resources within this locally and provincially significant cultural heritage landscape. The scope of the Conservation Plan should include the following:
  - Interpretation plan and/or strategy
  - Preliminary recommendations for restoration, rehabilitation and/or adaptive reuse;
  - Critical short-term maintenance required to stabilize the heritage resources and prevent deterioration;
  - Measures to ensure interim protection of heritage resources during phases of construction or related development;
  - Security requirements;

- Conservation, relocation and reconstruction measures required to successfully carry out the approved interventions;
- Appropriate conservation principles and practices, and qualifications of contractors and trades people that should be applied, especially in the dismantling and reassembling of the wing walls;
- Longer term maintenance and conservation work intended to preserve existing heritage fabric and attributes;
- 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; and,
- Compliance with recognized *Standards and Guidelines for the Conservation of Historic Places in Canada*, the *Guelph Innovation District (York District Lands) Official Plan Amendment 54*, City of Guelph Official Plan (2014) and other recognized heritage protocols and standards. As stated in the *Standards and Guidelines for the Conservation of Historic Places in Canada*, it is important to begin with a thorough understanding of the heritage value of the site, along with its condition, evolution over time, and past and current importance to the community (pg.3). The author of the Conservation Plan should work closely with the City of Guelph and the Province of Ontario (Infrastructure Ontario) to compile all available information pertinent to defining the study area's cultural heritage character-defining elements.



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**Project Personnel**

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<i>Report Author</i>	Linda Axford, MLA, CAHP
<i>Graphics</i>	Cara Howell, B.A.
<i>Report Reviewer</i>	Shaun Austin, Ph.D.

## 1.0 Project Context

### 1.1 Development Context

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The memorandum of January 2016 contained:

- ▶ A summary of heritage concerns identified in previous reports: the 2005 York District Land Use & Servicing Study: Background Report; the 2007 York Road Improvements Wyndham Street South to East City Limits Class Environmental Assessment; a Preliminary Heritage Easement Assessment by the Ontario Heritage Trust Staff; a Cultural Heritage Assessment Report by the Ontario Realty Corporation; the Official Plan Amendment 54 (Guelph Innovation District Secondary Plan [GID]) for the City of Guelph Official Plan; the GCC Conservation Plan (2009) by Infrastructure Ontario.
- ▶ A recommendation for additional heritage research including a Heritage Impact Assessment.

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<sup>1</sup> The Heritage Guelph Committee refers to the type of report as a Cultural Heritage Resource Impact Assessment (CHRIA).

- ▶ Determination of potential impacts on the identified heritage attributes with recommendations and/or mitigation.

Located within the study area is Clythe Creek, which is proposed to be partially relocated to permit the widening of the roadway and to create a channel that can convey higher flows, typical of 1.5 to 2-year storm events. The creek realignment and rehabilitation would improve the natural functions of the creek and enhance floral and faunal habitats. The creek channel would be realigned south from the York Road right-of-way and the connection to the floodplain would be upgraded.

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On December 20, 2017, Wood presented the City of Guelph with Road Alternatives 1 and 2. Pursuant to a Memo sent to the City of Guelph on April 5, 2018, Wood was requested to provide two additional roadway design alternatives. The objective of investigating these two new alternatives was to determine if the multi-use pathways could be maintained adjacent to York Road through either compromise of the multi-use pathway width, or acceptance of the cost of relocating the built heritage features at the Reformatory Entrance. The two new alternatives are as follows:

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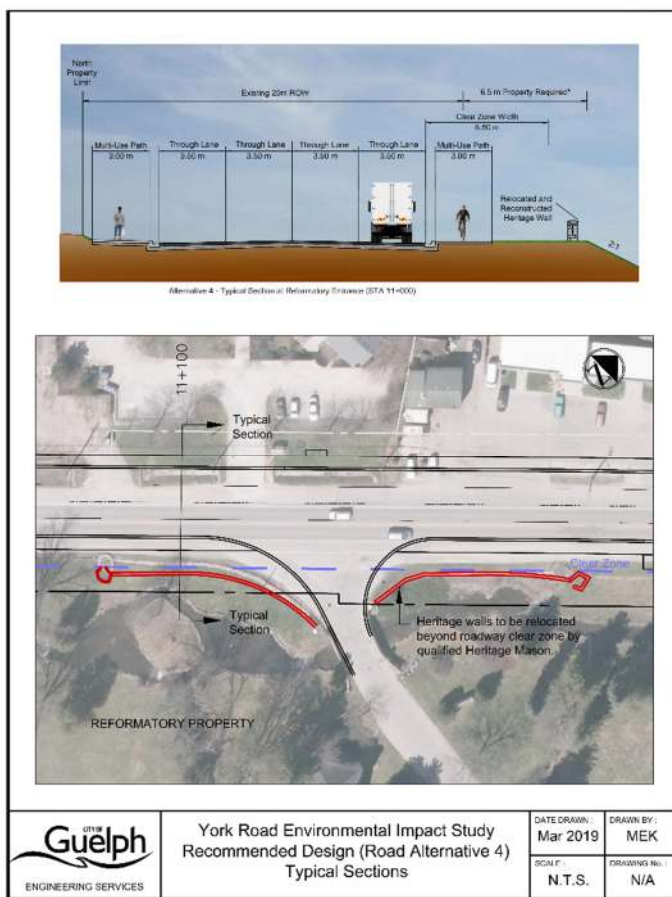
The effects of these two new alternatives was to be limited to the section of York Road between the western entrance to Royal City Jaycees Park (east of the existing Elizabeth Street intersection), and east of the Reformatory Property entrance where the south multi-use path had been located south of the Clythe Creek in the original Environmental Design Study (March 2017 submission). At the December 20 2017 meeting, the City of Guelph indicated that the recently approved *Active Transportation Network Study Update* (June 2017) requires that active transportation facilities must (where feasible) provide the same level-of-service as non-active modes of transportation. Locating the multi-use path south of Clythe Creek would place it within the floodplain and make it unusable during moderate to significant storm events (>2-year frequency), therefore significantly compromising its level of service relative to the roadway. Therefore, as indicated by the City at the December 20, 2017 meeting, it is preferred that the multi-use path be located adjacent to the road.

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the west side of the entranceway would move the wall further south so that it would be outside of the clear zone (Drawing 1). Relocation and reconstruction of both wing walls would also uncover and restore the walls' original height. Relocation of the wall would need to be undertaken by skilled heritage masons and would require additional embankment grading and the use of retained soil systems (or retaining walls) between the heritage wall and the creek.

In order to optimize the available space within the right-of-way, the roadway alignment would be shifted 1.5 m to the north relative to the design presented in the draft EIS dated March 2017. The road profile has also been adjusted to minimize grading impacts on adjacent properties. Similar to the design presented in the draft EIS, extension of the Hadati Creek culvert would be required, and opportunities to reduce impacts to the creek and heritage features through implementation of various segments of retaining walls/soil systems could be investigated as part of detailed design. The Alternative 4 roadway cross-section adjacent to the relocated heritage walls is illustrated below:



**Drawing 1: Typical Roadway Cross-Section for York Road Alternative 4 and Drawing Showing Relocation of Wing Walls**

## 1.2 Methodology

Amendment No. 48 to the City of Guelph Official Plan<sup>2</sup>, Envision Guelph – Official Plan Update Phase 3 explains in detail the requirements of a Heritage Impact Assessment:

*i) a description of the proposed development, redevelopment or site alteration, including a location map showing proposed buildings, existing land uses, site survey, architectural drawings, detailed conceptual façade renderings, interior architectural details where the heritage attributes are identified within a building or structure and other details as specified by the City;*

*ii) a detailed description of the built heritage resource(s), cultural heritage landscape features, heritage attributes, sources of research and conclusions regarding the significance of the cultural heritage resource with respect to their cultural heritage value or interest;*

*iii) a description of the existing regulations if any, affecting the proposal (e.g. flood or fill regulation);*

*iv) a description of cultural heritage resources and heritage attributes that may be directly or indirectly affected by the proposal;*

*v) a description of the impacts that may reasonably be caused to the cultural heritage resource or heritage attributes and how the impacts may affect the value or interest of the resource or attribute;*

*vi) an evaluation of alternative conservation and avoidance or mitigation measures and their effectiveness in conserving the cultural heritage resource or heritage attributes. Such evaluation shall be based on established principles, standards and guidelines for heritage conservation and include an assessment of the advantages and disadvantages of each;*

*vii) an implementation and monitoring plan shall be required and include a reporting structure for the implementation of the recommended actions as development and site alteration proceeds; and*

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<sup>2</sup> The City of Guelph Official Plan, March 2018 Consolidation



*viii) any other information required by the Province or the City, in consultation with Heritage Guelph that is considered necessary to evaluate the proposal.*

The background research was conducted by Ms. Linda Axford. The heritage property inspection of the entire study area between Wyndham Street south and the East City Limit was conducted on December 4, 2015. Further investigations for the Heritage Impact Assessment at 785 York Road along the Guelph Correctional Centre frontage near the roadway were undertaken on October 28, November 1, and November 22, 2016. The weather was cool and overcast during all four property reviews and did not impede the inspections in any way.

This work is based on a systematic qualitative process carried out to assess the potential heritage value of a given property based on its physical and design characteristics, historical land use and associations, and context, both social and environmental.

Based on a review of all pertinent background sources and information collected during the site visit, the built heritage resources and cultural heritage landscape observed were assessed based on provincial policy guidelines. The Province states that “significant built heritage resources and significant cultural heritage landscapes shall be conserved” (PPS, 2014: Section 2.6.1). Built heritage resources are defined as “one or more significant buildings, structures, monuments, installations or remains associated with architectural, cultural, social, political, economic or military history and identified as being important to a community.” Cultural heritage landscapes are defined as “a defined geographical area of heritage significance which has been modified by human activities and is valued by a community...it involves a grouping(s) of individual heritage features such as structures, spaces archaeological sites and natural elements, which together form a significant type of heritage form, distinctive from that of its constituent elements or parts”. These resources may be identified through designation or heritage conservation easement under the OHA. In assessing a property’s cultural heritage value, Wood staff refers to *Ontario Regulation 9/06 - Criteria for Determining Cultural Heritage Value or Interest* and *Ontario Regulation 10/06 – Criteria for Determining Cultural Heritage Value or Interest of Provincial Significance*.

*Ontario Regulation 9/06* outlines three main criteria for determining cultural heritage value or interest, further divided into nine sub-categories. A property must meet one or more the criteria in Table 1 to be considered significant. Table 1 provides an evaluation of the given property based on each of the criteria.

**Table 1: Evaluation of Cultural Heritage Value (Ontario Regulation 9/06)**

<b>Criteria</b>	<b>No.</b>	<b>Detailed Criteria</b>	<b>Evaluation</b>
Design or Physical Value  (The property has design value or physical value because it)	1	Is a rare, unique, representative or early example of a style, type, expression, material or construction method.	It is a rare convergence of two large reform movements: prison reform and the City Beautiful movement.
	2	Displays a high degree of craftsmanship or artistic value.	The inmates were taught stone and mason work which they employed throughout the grounds of the Guelph Correction Centre. This drew on the prison reform concepts of W.J. Hanna which included moving away from imprisonment as a form of punishment, towards the use of productive work and training as a means of rehabilitating inmates and providing them with employable skills for life after prison. This coincided with the Beaux-Arts movement which emphasised civic improvements. Architect John M. Lyle incorporated the French concept of Beaux-Arts in his design of the Reformatory buildings and grounds.
	3	Displays a high degree of technical or scientific achievement.	The inmates were taught the technical skills of stone and mason work which they employed throughout the grounds of the Guelph Correction Centre.
Historical or Associative Value  (The property has historical value or associative value because it)	1	Has direct associations with a theme, event, belief, person, activity, organization or institution that is significant to a community.	The cultural heritage landscape of the Reformatory (later the Guelph Correction Centre), has a direct association with W.J. Hanna, a major prison reformer, and the Beaux-Arts movement which was employed by the architect, John M. Lyle. These two themes, and the people who made use of them, were significant to the Reformatory and the community, but also had international importance.
	2	Yields or has the potential to yield information that contributes to the understanding of a community or culture.	The manner of inmate rehabilitation through the acquisition of new skills provides information as to how and why the cultural heritage landscape was created. The landscapes, including the stone walls, weirs, stairs and dams the inmates created, are still enjoyed by the Guelph public today.
	3	Demonstrates or reflects the work or ideas of an architect builder, artist	The cultural heritage landscape reflects the prison reform theories of W.J. Hanna.

<b>Table 1: Evaluation of Cultural Heritage Value (Ontario Regulation 9/06)</b>			
<b>Criteria</b>	<b>No.</b>	<b>Detailed Criteria</b>	<b>Evaluation</b>
		designer or theorist who is significant to a community.	The inmates applied their newly learned skills to stone working and landscaping.
Contextual Value  (The property has contextual value because it)	1	Is important in defining, maintaining or supporting the character of an area.	The cultural heritage landscape is important in defining the character of the now closed Guelph Correction Centre, which is currently a public space for the citizens of Guelph.
	2	Is physically, functionally, visually or historically linked to its surroundings.	The cultural heritage landscape provides value as a physical, functional, visual and historical link to the City of Guelph and its inhabitants by presenting the historic stonework and landscaping done by inmates. These built features are still highly valued today.
	3	Is a landmark.	Many parts of the cultural heritage landscape can be seen from York Road and provide a landmark that links the road, the neighbourhood and the City to an important marker of past achievement.

The ORC Conservation Plan of 2006 details the design and physical value and the historical and associative value of the site due to the work of John M. Lyle, a well-known Canadian architect who used the French concept of Beaux-Arts in his designs (ORC, pg. 46). The landscape setting of the GCC also communicates the prison reform movement of W.J. Hanna through its organization of spaces and the features constructed by the inmates. These two transformative individuals contributed to the contextual value by a convergence of new thinking in both prison reform and landscape reform that created a unique site that has survived beyond the correctional facility itself. This site, while functioning visually and historically, is a landmark that is a cherished space for the inhabitants of Guelph and the surrounding area.

*Ontario Regulation 10/06* outlines eight criteria for determining cultural heritage value or interest of provincial significance.

A property must meet one or more the following criteria to be considered provincially significant. In a 2013 report, by the Ontario Heritage Trust, entitled *Preliminary Heritage Easement Assessment by Ontario Heritage Trust Staff*, a preliminary evaluation based on the eight criteria of *Ontario Regulation 10/06* is made (OHT, 2013). The report concludes that the site does have provincial heritage significance based on the eight criteria which are taken from the description offered by OHT staff as per the following:

1. *The property represents or demonstrates a theme or pattern in Ontario's history:* The Guelph Correctional Centre (GCC) is associated with the provincial theme of Law and Security.
2. *The property yields, or has the potential to yield, information that contributes to an understanding of Ontario's history:* The design, architecture and landscape of the GCC property is reflective of prison reform and contributes to an understanding of the evolution and history of inmate treatment and rehabilitation in the 20<sup>th</sup> century.
3. *The property demonstrates an uncommon, rare or unique aspect of Ontario's cultural heritage:* Based on ... the well preserved integrity of the heritage attributes (such as the collection of landscape features completed by inmate labour, the expanses of open space and the Beaux-arts architecture of the buildings), it is probable that the GCC demonstrates a unique aspect of Ontario's history and has the potential to possess provincial significance.
4. *The property is of aesthetic, visual or contextual importance to the province:* The City Beautiful Movement, popular in North America from the late 19<sup>th</sup> century to the start of the Great Depression was an urban planning style and strategy that promoted the creation of civic beauty through architectural harmony, unified design and visual variety.
5. *The property demonstrates a high degree of excellence or creative, technical or scientific achievement at a provincial level in a given period:* The GCC does not have the potential to possess provincial significance under Criterion 5.
6. *The property has a strong or special association with the entire province or with a community that is found in more than one part of the province. The association exists for historic, social, or cultural reasons or because of traditional use:* The GCC does not have the potential to possess provincial significance under Criterion 6.
7. *The property has a strong or special association with the life or work of a person, group or organization of importance to the province or with an event of importance to the province:* The GCC is associated with architect John M. Lyle. Lyle trained as an architect at the Yale School of the Arts and the École de Beaux-Arts in Paris .... On his return to Canada in 1906, he became a key figure in the dissemination of Beaux-Arts ideals to the architectural profession and a leader in Toronto's City Beautiful movement.
8. *The property is located in unorganized territory and the Minister determines that there is a provincial interest in the protection of the property:* The Subject Property is located in an incorporated municipality and therefore Criterion 8 does not apply (OHT, 2013).

In a 2018 report, by Infrastructure Ontario, entitled *Strategic Conservation Plan, Guelph Correctional Centre*, recommendations were made for conservation strategies for the property. This report was written to provide guidance on conserving the cultural heritage value of the property leading up to and during the proposed disposition of the property.

Resources within the Study Area have been assessed on a preliminary basis against the above criteria to determine whether they have any cultural heritage value or interest. They have also been considered in terms of potential project impacts and mitigation measures.

## 2.0 Historical Context

### 2.1 Physiography

The study area is located within the Guelph Drumlin Field physiographic region (Chapman and Putnam, 1984, pg. 137). The Guelph Drumlin Field centres on the City of Guelph and Guelph Township and occupies an area of 828 square kilometres. Topsoils are loamy and calcareous, with underlying red shale. The glacial till throughout is rather stony, with large surface boulders being more numerous in some localities than others.

The City of Guelph is the social, cultural, and commercial centre of this region. Founded in 1827 by John Galt of the Canada Company, it was located on a gravel terrace at the confluence of the Speed and Eramosa Rivers. As the city has grown it has spread over the surrounding hills. The Roman Catholic basilica surmounts a drumlin at the end of Macdonell Street in downtown Guelph, while the University of Guelph occupies another couple of drumlins in the south. In the early part of the city's development manufacturing firms were situated in the southeastern part of the city on the gravel terraces adjacent to the Eramosa River. Streams located in the Guelph Drumlin Field are in the spillway valleys, and though small, usually hold some water even in the driest summers, indicating the great reservoir capacity of the Pleistocene gravel beds. This has allowed for significant gravel excavation in the vicinity of Guelph (Chapman and Putnam, 1984, pg. 138).

### 2.2 Brief History of Guelph and the Guelph Correctional Centre

A review of primary and secondary source material provides a contextual overview of the study area at the front of the Guelph Correctional Centre, including a general description of Euro-Canadian settlement and land use. Historically, the study area of the front portion of the GCC next to York Road comprises Lots 1 to 5 in Concession 2 and Lots 1 to 5 in Concession 3 in the former Township of Guelph, County of Wellington. The two earliest maps used to trace property owners and historical features are the 1861 *Charles J. Wheelock Map of Wellington County*, and the 1877 map of Guelph Township from the *Illustrated Historical Atlas of the County of Wellington*. It should be noted that not all features of interest were mapped systematically in either of these maps as they were financed by subscription and subscribers were given preference with regard to the level of detail provided on the maps (Appendix A: Figures 4 and 5).

Table 2: Review of Historical Maps							
Location		1861 Illustrated Historical Atlas of Wellington County		1877 Illustrated Historical Atlas		1906 Atlas Map of Guelph Township	
Conc.	Lot	Owner(s)	Features	Owner(s)	Features	Owner(s)	Features
II	1	Thomas Coghlin	Tributary	North of the Historic Tributary D. Cameron South of the Historic Tributary H. J. Sanders	Speed River and Tributary Structure	Wm. Gibson	Canadian Pacific Railroad and Tributary
	2	Thomas Coghlin	Tributary	D. Cameron	Structure and Tributary	Wm. Gibson	Canadian Pacific Railroad and Tributary
	3	W. Allan	Tributary	NW corner: D.G. Farr D. Allan	Structure and Tributary	Miss. Tend(?) & Wm. Farr	Structure and Tributary
	4	R. Mathews	Tributary	H. Matthews	Tributary	Chas. & Geo. Mathews	Tributary
	5	R. Mathews		R. Cochrane	School and Tributary	Jas. Love	Structure and School and Tributary
III	1	R. Dunbar	Railroad	F. Lowal	Tributary and Railroad	H.O. Stutt	Railroad
	2*	H.M. Culloch	Inn and Railroad	Triangle and West 1/2: J. Smart Eastern 1/2: W.J.P.	Railroad	West ½: Anthony Krajewski, East ½ and Triangle unreadable	Three Structures, Railroad and Tributary
	3*	F. Kerr	Railroad	SW R.C. NW J.P. SE B.G. NE R. Cochran	Railroad	Wm. Davidson	Railroad
	4	Traynor	Tributary and Railroad	Southern portion: P Gried Northern portion: J. Murphey	Railroad and Two Structures	Wm. Davidson	Railroad and One structure
	5	D. Duggan	Tributary and Railroad	Mrs Duggard	Railroad	Valentine Brelski	Railroad and Tributary

### Wellington County

In 1838 the District of Wellington was set apart from the previously designated Home District of 1798. Guelph became the county seat and the first meeting of the District Council was held in the Court House on February 8<sup>th</sup>, 1842 (1906 Historical Atlas, pg. 2). In 1854 the Townships



comprising Wellington County were organized into: Amaranth, Arthur, Eramosa, Erin, Garafraxa, Guelph, Maryborough, Nichol, Peel, Piklington and Puslinch.

Prior to the establishment of the railways, reliable roads were very important as all goods were taken by road from Guelph to Dundas to be shipped by water through the Great Lakes. Gravel, for road building, was in abundance in the area and became important in road construction.

The age of the railway followed by the mid-19<sup>th</sup> century. According to the *Illustrated Historical Atlas of Wellington County* (1906: 2): "On the 30<sup>th</sup> of January 1852, the first train over the Toronto and Guelph Railway, conveying a large deputation of visitors arrived at the York Road bridge." Thus, commenced an era of great prosperity for Guelph and Wellington County with the Toronto and Guelph Railway later becoming the Grand Trunk Railway.

## **City of Guelph**

The City of Guelph was founded by John Galt, Superintendent of the Canada Company, and a well-known author, on April 23, 1827. Shortly thereafter a frame store was built on East Market Square, near the Grand Trunk station. A sawmill, blacksmith, gristmill and several taverns followed (1906 Historical Atlas, pg.3). By 1833, approximately 1,050 people inhabited the city. During the Rebellion of 1837-38, Guelph suffered from trade depression and it wasn't until the arrival of the railroad that the city started to prosper. Steady growth ensued, and the population rose to 5,000 by 1865 and to 10,000 by 1879.

During the first half of the 20<sup>th</sup> century, periods of war and economic downturns slowed the growth of Guelph. Factory culture dominated with more than 35% of the population employed by less than half a dozen industries. During this period, civic projects including the Carnegie Library, the Armoury, the enlargement of the Guelph Fairgrounds and the construction of the Provincial Reformatory were built (Cultural Heritage Action Plan: Background Report (July 2018), City of Guelph, pg. 52). The second half of the 20<sup>th</sup> century saw the relocation of industry outside of the downtown area which meant more automobile dependence and road construction.

## **Township of Guelph**

In 1827 through the Canada Company, Galt bought unsold lands in Upper Canada to compensate people loyal to the British Government who had lost land during the War of 1812. Galt chose Guelph Township as it was one of the largest vacant blocks of land within reasonable distance to York for trade purposes and settlement on either side of the township was well-established (Cultural Heritage Action Plan, City of Guelph, pg. 49).

Guelph Township was patented on July 9<sup>th</sup> 1829 and contained an area of 42,338 acres (17,134 hectares). The first settler in the township was Samuel Rife who arrived in 1825 and the first road was called the Waterloo road, and later renamed the Broad road. A ship full of Scottish settlers arrived in 1827 and left their mark in the names of various streets and buildings such as Paisley Street (1906 Historical Atlas, pg. 8).

Throughout the 19<sup>th</sup> and 20<sup>th</sup> centuries Guelph Township became a centre for agricultural excellence supported by rural and agricultural educational institutions.

## **Guelph Correctional Centre**

In 1909, 1,000 acres (453 hectares) of farmland were purchased by the Province of Ontario along York Road in the City of Guelph for the purpose of creating a new prison. The prison was not only at a new location but was also new in concept. The driving force behind the location and the concept was William John Hanna, Secretary and Registrar General for the Province of Ontario. He was responsible for public charities, prisons, asylums, health, child welfare, statistics, corporate registration and liquor regulations.

Although eventually known as the Guelph Correctional Centre (GCC), the site was initially known as the Ontario Reformatory, and followed W.J. Hanna's reform theories of moving away from incarceration as a form of punishment toward the use of productive work and training as a means of rehabilitating inmates and giving them employable skills for life on the outside. Hanna's "reformist ideals were not restricted to corrections; Hanna was also a leading force in the building of the Whitby psychiatric hospital beginning in 1913 where he hoped that a similar program of humane treatment, useful work, extensive grounds, sympathetic architecture and attentive staff would create an environment conducive to treatment and cure" (ORC, 2006, pg.5).



**Photograph 1: 1948 Aerial Photo of Guelph Correctional Centre (initially known as Ontario Reformatory) Taken from Toronto Public Library website:**  
<https://www.torontopubliclibrary.ca/search.jsp?Erp=20&N=&No=20&Ntt=Ontario+Reformatory+Guelph+%28Ont.%29&view=grid>

In 1911 Hanna hired well-known architect John M. Lyle to design the buildings at GCC. Lyle was trained in France and the United States in the Beaux-Arts style of architecture and although Hanna and Lyle could not agree on fees, the design of the early buildings have a strong Lyle design style. By 1915, Lyle had been replaced by James Govan, an architect in the Department of Provincial Secretary, who had been responsible for the designs of the Whitby hospital buildings. The grounds were planned and managed by the reformatory managers and staff of the Ontario Agricultural College at Guelph (ORC, 2006, pg.5).

While the design was done by professionals, it was the actual construction and craftsmanship that embodies the work of the prisoners. The park-like entrance way including stone gateways with wing-walls opening to the street, weirs and dams in Clythe Creek, and the gatehouse along York Road are part of the landscape's formal presentation zone. This area is unlike any previously

constructed prison in the province and envisioned the prison reform theories of W.J. Hanna. The bucolic setting later became a recreational setting for the residents of Guelph who held picnics and walked the pathways.

Besides showcasing the prison reform movement, the Guelph Correctional Centre also represented the City Beautiful movement of the early twentieth century. "While the term 'City Beautiful' implied a range of civic improvement efforts, most planning historians have emphasized the so-called 'comprehensive schemes of city beautification' which focused on the treatment of streets, parks and/or civic centres. Design principles included axial arrangements, vistas and focal points, classical touches, and a tendency towards order and symmetry" (Meek 1979, pg. ii).

Similar to the prison reform movement, the City Beautiful movement espoused that beautiful cities could affect human behaviour. As a by-product of the Beaux-Arts movement, it contained the notion that urban beautification actively improved the moral and social character of the citizens. Using this model, it was assumed that citizens would value, respect and keep their surroundings beautiful and tidy and by doing so would become more genteel and respectable (<http://vancouverpublicspace.ca/2016/02/04/the-city-beautiful-movement-urban-design-and-moral-well-being>). As the perfect convergence of both reform movements, the Guelph Correctional Centre stood alone in its uniqueness and significance during this transformative period.



**Photograph 2: 1935 Postcard Showing Water Falling over Weirs:**  
<http://guelphpostcards.blogspot.ca/search/label/Guelph%20Correctional%20Centre>

This circa 1935 postcard is entitled: "Scene by the Highway, near Guelph, Ontario, Canada. " There is no mention of the Guelph Correctional Centre.

It was the Reformatory inmates which was integral to landscaping the site. They dug two large lakes along York Road, beautified Clythe Creek with stone retaining walls, piers and dams, and installed tile drainage systems in the now unused Royal City Jaycees Bicentennial Park and in the field opposite Willowbank Hall. They maintained the grounds, flower beds, floral displays, tree pruning and all aspects of vegetable gardening. From a visual perspective, it was their artistry and labour that created the extensive and beautiful stone walls, steps, bridge features and dams and weirs along Clythe Creek.



**Photograph 3: Ontario Reformatory gardens circa 1960, taken from Guelph Museum Collections**  
<https://guelph.pastperfectonline.com/photo/6491B56C-7EB3-41B6-AA82-162011154698>

While it is the front of the property next to York Road that is the focus of this report, the entirety of the GCC contained a self-sufficient industrial complex and working farm. The whole site included an astonishing array of buildings that not only housed the inmates but added in their rehabilitation. Some of these reintegration facilities included a greenhouse, a textile shop, a woolen mill, a cannery and an abattoir.

Farm operations were discontinued in the mid-1970's when the prison reform movement changed direction yet again. The entire Centre was closed in 2001 when the Province decided that it was too expensive to maintain and chose to streamline the correctional system. It has remained vacant since then, except for occasional use by the film industry and security training groups.

### 3.0 Legislative Framework, Cultural Heritage Resource Evaluation Tools

#### 3.1 Ministry of Tourism Culture and Sport

Guidelines for undertaking the assessment of cultural heritage resources are provided by various government ministries, including the Ministry of Tourism, Culture and Sport (MTCS), which acts as administrator of the *Ontario Heritage Act*, and is ultimately responsible for the conservation, protection, and preservation of cultural heritage in the province.

The MTCS has issued guidelines to assist in the identification and assessment of cultural heritage resources as part of the environmental assessment process. These guidelines include: “*Guidelines for Preparing the Cultural Heritage Resource Component of Environmental Assessments*” (1992) and “*Guidelines on the Man-Made Heritage Component of Environmental Assessments*” (1980). These guidelines distinguish between built heritage resources and cultural heritage landscapes. Built heritage resources are individual person-made or modified resources such as buildings or structures. Cultural heritage landscapes are geographical areas that have been modified by human activity over time and may include a grouping of built heritage components.

The MTCS has also issued the *Ontario Heritage Toolkit* (“Toolkit”) to assist in understanding the legislation and tools available for the conservation of cultural heritage resources. The Toolkit provides a framework for heritage property evaluation and defines “cultural heritage properties” as: “built heritage resources, cultural heritage landscapes, heritage conservation districts, archaeological resources and/or areas of archaeological potential that have cultural heritage value or interest, cemeteries and burial features, landscapes, spiritual sites, ruins, archeological sites, and areas of archaeological potential (MTCS, 2006: 6).

#### 3.2 Ontario Heritage Act

Using policy direction as outlined in the *Provincial Policy Statement* (Ministry of Municipal Affairs and Housing, 2014), the protection of cultural heritage resources is considered a matter of provincial interest under the authority of the *Planning Act* and further defines a built heritage resource as “significant” if it is “valued for the important contribution [it] make[s] to our understanding of the history of a place, an event or a people”. The *Ontario Heritage Act* (OHA) charges the MTCS with the responsibility for the conservation, protection and preservation of Ontario’s cultural heritage and, as such, the MTCS acts as administrator of heritage legislation.



The OHA provides tools to Ontario's municipalities to protect their heritage resources. Municipalities' conservation efforts are enabled by the OHA, which outlines the criteria to be used for the evaluation of significance. Section 29 of the OHA allows cultural heritage properties to be designated, which results in long-term protection. Further, Section 27 requires the Clerk of a municipality to keep a public register of heritage properties, which includes all those properties designated under the OHA, but also allows municipalities to list non-designated properties on the "Municipal Register," which provides short-term protection from removal. When a property is designated under the OHA, it is also placed on the Ontario Heritage Trust's provincial register of heritage properties.

The primary goals of heritage assessments are: to create a register or inventory of cultural heritage resources within a project Study Area; to evaluate potential impacts on those resources; and to propose mitigation options (MTCS, 2006). The criteria for identifying and evaluating heritage properties include both quantitative and qualitative attributes. Ontario regulation 9/06 made under the OHA, outlines three criteria for determining cultural heritage value or interest. These include: design/physical value, historical/associative value, and contextual value.

Cultural heritage landscapes can be evaluated using the same criteria. These can include remnant landscapes where only a fraction of the original heritage features is present.

Defined landscapes include gardens, parks, and cemeteries which were designed for aesthetic or economic reasons. Organically evolved landscapes result from a long-term relationship between human activity and the natural environment. They may represent a past event or process with tangible markers of that time or their use may be continuing to play a role in contemporary society but retain evidence of past use. Associative cultural landscapes include those which may have no evidence of cultural activity, but the natural features are known to have spiritual, artistic, or other cultural significance.

### **3.3 City of Guelph Official Plan (March 2018 Consolidation)**

Within the Official Plan Consolidation (March 2018) (Section 2.2 Protecting What Is Valuable) 2c: Enhance the visual identity of the city through protecting and celebrating the City's cultural heritage resources. In section 4.8 Cultural Heritage Resources, the Official Plan states that: Cultural heritage resources are the roots of the community. They may include tangible features, structures, sites or landscapes that either individually or as a part of a whole are of historical, architectural, scenic or archaeological value. Cultural heritage resources may also represent intangible heritage such as customs, ways of life, values and activities. These resources may represent local, regional, provincial or national heritage interests and values. They include built heritage resources, cultural



heritage landscapes and archaeological resources. Cultural heritage resources paint the history of the city and provide identity and character while instilling pride and contributing to economic prosperity.

Objectives:

a) To maintain and celebrate the heritage character of the city, including built heritage resources, cultural heritage landscapes and archaeological resources.

b) To identify, evaluate, list, conserve and protect cultural heritage resources through the adoption and implementation of policies and programs including partnerships amongst various public and private agencies and organizations.

c) To enhance the culture of conservation city-wide by promoting cultural heritage initiatives as part of a comprehensive environmental, economic and social strategy where cultural heritage resources contribute to achieving a sustainable, healthy and prosperous city.

d) To ensure that all new development, site alteration, building alteration and additions are contextually appropriate and maintain the integrity of all in situ cultural heritage resources or adjacent protected heritage property.

e) To promote and foster the preservation, rehabilitation and adaptive re-use or restoration of built heritage resources and cultural heritage landscapes so that they remain in active use.

f) To promote public and private awareness, appreciation and enjoyment of the City's cultural heritage resources through public programs and activities, heritage tourism and guidance on appropriate conservation practices.

g) To maintain a municipal register of properties of cultural heritage value or interest in accordance with the Ontario Heritage Act.

h) To identify, designate and conserve built heritage resources and cultural heritage landscapes in accordance with Part IV of the Ontario Heritage Act.

i) To identify, designate and conserve Heritage Conservation Districts under Part V of the Ontario Heritage Act.

j) To identify, evaluate and conserve heritage trees which satisfy the criteria for determining cultural heritage value or interest as prescribed by regulation under the Ontario Heritage Act.

k) To identify, evaluate and conserve archaeological resources and areas of archaeological potential in accordance with the Ontario Heritage Act. 2.4.15, the Culture of Conservation, the OP states the importance of cultural heritage conservation, including conservation of cultural heritage and archaeological resources, where feasible.

Section 4.8.1 Policies (that pertain to this site):

1. Cultural heritage resources shall be conserved in accordance with this Plan and all other relevant legislation.

3. A register of property situated in the city that is of cultural heritage value or interest shall be maintained and kept up to date by the City, in consultation with Heritage Guelph, according to Section 27 of the Ontario Heritage Act. The Municipal Register of Cultural Heritage Properties (or Heritage Register) will list designated cultural heritage resources and non-designated built heritage resources and cultural heritage landscape resources.

6. Built heritage resources and cultural heritage landscapes are required to be maintained with appropriate care and maintenance that conserves: i) the City's Property Standards By-law, the Tree By-law and the Site Alteration By-law; and ii) prescribed federal and provincial standards and guidelines.

7. The ongoing maintenance and care of individual built heritage resources and cultural heritage landscapes and the properties on which they are situated together with associated features and structures is required in accordance with City standards and bylaws and, where appropriate, the City will provide guidance on sound conservation practices.

10. The City will encourage property owners to seek out and apply for funding sources available for conservation and restoration work.

12. The City will ensure the conservation and protection of cultural heritage resources in all planning and development matters including site alteration, transportation, servicing and infrastructure projects.

14. It is preferred that cultural heritage resources be conserved in situ and that they not be relocated unless there is no other means to retain them. Where a cultural heritage resource cannot be conserved in situ or through relocation and approval for removal is granted, the City in consultation with Heritage Guelph will require the proponent to provide full documentation of the cultural heritage resource for archival purposes, consisting of a history, photographic record and measured drawings, in a format acceptable to the City.

15. The proponent shall provide and deliver to the City all or any part of the demolished cultural heritage resource that the City, in consultation with Heritage Guelph, considers appropriate for reuse, archival, display, or commemorative purposes, at no cost to the City. The City may use or dispose of these artifacts as it deems appropriate in accordance with the Ontario Heritage Act and any applicable regulations or guidelines.

In Section 5.8: Road Design Policies (that pertain to this site):

1. The City will ensure any impacts on the Natural Heritage System and cultural heritage resources are addressed in the design process for road capital projects in accordance with the provisions of this Plan.
2. The City shall have regard for and, when necessary, will require measures to mitigate any negative impacts on cultural heritage resources, especially the character of landscapes, streetscapes, tree lines, bridges, views and points of scenic interest and the prevailing pattern of settlement, when considering the construction of new roads and road improvements, including road re-alignment and road widening.

### **3.4 The Official Plan Amendment (OPA) #54 – Guelph Innovation District (York District Lands)**

Principle 4: Create an Attractive and Memorable Place, specifically mentions the former Guelph Correction Centre in 'j)' by stating: "respect (and emulate where appropriate) the Beaux-Arts design of the *cultural heritage landscape* component of the historic Reformatory Complex".

In Section 11.2.2.2 Cultural Heritage the Amendment states that development within the Guelph Innovation District (Appendix A: Figure 6) that are designated as Adaptive Re-use within a *cultural heritage landscape* with *built heritage resources* should adopt an architectural vocabulary and design elements that are compatible with and respectful of the cultural heritage value and heritage attributes of the *cultural heritage resources* on site.

It further states that *cultural heritage resources* including all features identified as provincially significant shall be conserved through long term protection mechanisms (e.g. heritage conservation easements) and that a Cultural Heritage Resource Impact Assessment and/or Conservation Plan will be required as part of a complete application to ensure that the *cultural heritage resources* within the site will be conserved. Also, important in OP54 are the visual relationships between *cultural heritage landscapes* and *built heritage resources*.

Also, important to understanding the level of significance of the study area, the Amendment states that "development will respect the existing *cultural heritage resources* and important *public views* and *public vistas* in site design (OPA 54, pg. 34).

## 4.0 Analysis

The study area is comprised of an evolved cultural heritage landscape. While the maintenance of the GCC has been limited since the closure of the facility in 2001, the man-made landscapes in the study area are still in evidence and viable. This ornamental landscape faces York Road and consists of man-made ponds, dams and weirs in Clythe Creek, park-like grounds, lawns, mature trees, small stone wing walls at the north east corner of the CHL, stone stairs and a stone gateway with wing-walls opening to the street. Willowbank Hall, the cottage near the entrance, also adds a domestic appearance to the front of the site.

In 2006, the property was recognized as a provincially significant heritage resource by the Ontario Realty Corporation (now Infrastructure Ontario). The ensuing ORC Cultural Heritage Assessment Report gave an overview of the site, a detailed history of the facility and the individual buildings. The description of the landscape explains the reform theory of the site:

*The evolved cultural landscape has two main parts: an ornamental landscape created by prison labour to define the hierarchy of the site and to create scenic and gardenesque elements; and the working landscape, where agricultural and industrial activities supported the correctional philosophy and everyday prison life (ORC 2006, pg. 34).*

The section of the ORC report most salient to this Heritage Impact Assessment describes the main York Road entrance which:

*...still retains its landscape features including the mature trees and ornamental stone walls, and two decorative concrete bridges. The main driveway crosses over a manmade rustic watercourse of ponds, dams, and streams. Within the ornamental landscape with its park like arrangement of wide open lawns dotted with mature specimen trees are other stonework features which are unique and rare surviving examples of this craft. The stonework, a result of years of inmate labour, is found in the stairs, walls, gateposts, bridges and dams. There are two types of stone, native limestone and granite fieldstone used with a variety of joint patterns. The extensive stonework is generally intact and is of unrivaled heritage value (ORC 2006, pg. 34).*

The ORC report further suggested that the “two ponds are considered part of the designed landscape that forms the larger cultural heritage landscape” (ORC 2006, pg. 38).

In a 2018 report, by Infrastructure Ontario, entitled *Strategic Conservation Plan, Guelph Correctional Centre*, recommendations were made for conservation strategies for the property. This report was written to provide guidance on conserving the cultural heritage value of the property leading up to and during the proposed disposition of the property.

The primary watercourse through the study area is Clythe Creek, which crosses York Road west of Watson Parkway. Its headwaters are a coldwater stream that has historically sustained a trout population. It is feasible that at some point in time, the lower section of the creek also supported cold to cool water fish populations, however current temperature monitoring suggests this is no longer the case.

Presently, the creek is highly altered, with numerous drop structures (most of which have cultural heritage value that restrict fish passage and on-line ponds that warm the water. Clythe Creek is further constrained by the available area between York Road and two large on-line ponds.



In addition to Clythe Creek, consideration must also be given to Hadati Creek, which drains in an easterly direction along Elizabeth Street before outletting across York Road to Clythe Creek.

As noted within the original 2007 Class EA, the proposed roadway improvements were expected to impact Clythe Creek and recommendations were made with respect to an extension of the existing Clythe Creek Culvert where it crosses York Road. Also recommended was the possible relocation of approximately 135 m of the Clythe Creek Channel to accommodate the proposed road widening, which would leave the heritage features in situ but without water flow.

The potential re-alignment of Clythe Creek (Appendix A: Figure 7a, b and c), due to the potential widening of York Road and the natural heritage objective to create a cool/cold-water creek, would alter the overall look of the cultural heritage landscape in several ways. Furthermore, the widening of York Road could also potentially impact some of the heritage resources due to visibility, grading and road salt.




Appendix A: Figures 7a, b and c show the potential realignment of Clythe Creek (Option 4) and indicate numbers used in the Heritage Resources Table 3 below.



Table 3: Current Heritage Resource Photographs with Impacts and Mitigation			
No	Photo	Impacts	Recommended Mitigation
1	 <p>Bridge shown from the south side of York Road. Clythe Creek passes through the culvert under the road at this location.<sup>3</sup></p>	<p><b>Relocation or Removal:</b>            Bridge/culvert would be removed and replaced with a wider arched culvert for the road widening.</p>	<p>No mitigation</p>
2	 <p>Reinforced concrete road bridge railing (remnant) circa 1920 on the north side of York Road.</p>	<p><b>Relocation or Removal:</b>            This feature would be removed due to road widening and multi-use path.</p>	<p>If possible, relocation within the GCC or to other parts of Guelph in order to better accommodate conservation and adaptive reuse. The appropriate context of the resource must be considered in relocation. Partial salvage, documentation through measured drawings and high-resolution digital photographs, and/or historical plaquing.</p>

<sup>3</sup> Source of all photos in Table 3 is the City of Guelph, Heritage Planning file photos.



Table 3: Current Heritage Resource Photographs with Impacts and Mitigation			
No	Photo	Impacts	Recommended Mitigation
3	 <p>Fieldstone weir with steps and sentinel stones. This is a barrier to fish passage.</p>	<p><b>Maintained in situ:</b> This feature would be maintained in landscape but will be impacted by loss of flow as a result of channel realignment.</p>	<p>May require repairs. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant. Where possible, creek realignment design should incorporate the 'high-flow' channel to convey higher flows over the weir structure.</p>
4	 <p>Fieldstone garden wall with sentinel stones.</p>	<p><b>No Impact:</b> Wall to remain in existing condition</p>	<p>May require repairs. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant.</p>
5	 <p>Fieldstone weir with clay pipes. This is a barrier to fish passage.</p>	<p><b>Maintained in situ:</b> This feature would be maintained in landscape but would be impacted by loss of flow as a result of channel realignment</p>	<p>May require repairs. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant. Where possible, creek realignment design should incorporate the 'high-flow' channel to convey higher flows over the weir structure.</p>

**Table 3: Current Heritage Resource Photographs with Impacts and Mitigation**



No	Photo	Impacts	Recommended Mitigation
6	 <p data-bbox="298 674 493 705">Fieldstone steps.</p>	<p data-bbox="911 317 1045 380"><b>Potentially impacted:</b></p> <p data-bbox="911 380 1143 499">The steps may be covered by grading for road and pathway.</p>	<p data-bbox="1170 317 1419 926">If possible, relocation within the GCC or to other parts of Guelph in order to better accommodate conservation and adaptive reuse. The appropriate context of the resource must be considered in relocation. Partial salvage, documentation through measured drawings and high-resolution digital photographs, and/or historical plaquing.</p>
7	 <p data-bbox="298 1346 704 1377">Large Boulder or bedrock outcrop.</p>	<p data-bbox="911 968 1045 1031"><b>Potentially impacted:</b></p> <p data-bbox="911 1031 1110 1150">This feature may be covered by grading for road and pathway</p>	<p data-bbox="1170 968 1419 1577">If possible, relocation within the GCC or to other parts of Guelph in order to better accommodate conservation and adaptive reuse. The appropriate context of the resource must be considered in relocation. Partial salvage, documentation through measured drawings and high-resolution digital photographs, and/or historical plaquing.</p>



Table 3: Current Heritage Resource Photographs with Impacts and Mitigation			
No	Photo	Impacts	Recommended Mitigation
8	 <p>Fieldstone weir. This is a barrier to fish passage</p>	<p><b>Maintained in situ:</b> The weir would be maintained in landscape but would be impacted by loss of flow as a result of channel realignment.</p>	<p>May require repairs. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant. Where possible, creek realignment design should incorporate the 'high-flow' channel to convey higher flows over the weir structure.</p>
9	 <p>Fieldstone weir beside gabion baskets. (Gabion baskets are not part of listed heritage resource).</p>	<p><b>Removal or possibly maintained in situ:</b> This feature would be removed due to grading for road widening and multi-use path. If a proposed retaining wall is built it could be maintained in the landscape but will be impacted by loss of flow.</p>	<p>If possible, relocation within the GCC or to other parts of Guelph in order to better accommodate conservation and adaptive reuse. The appropriate context of the resource must be considered in relocation. Partial salvage, documentation through measured drawings and high-resolution digital photographs, and/or historical plaquing.</p>



Table 3: Current Heritage Resource Photographs with Impacts and Mitigation			
No	Photo	Impacts	Recommended Mitigation
10	 <p>Fieldstone weir.</p>	<p><b>Removal or possibly maintained in situ:</b> This feature would be removed due to grading needed for road widening and multi-use path. If a proposed retaining wall is built it could be maintained in the landscape but will be impacted by loss of flow.</p>	<p>If possible, relocation within the GCC or to other parts of Guelph in order to better accommodate conservation and adaptive reuse. The appropriate context of the resource must be considered in relocation. Partial salvage, documentation through measured drawings and high-resolution digital photographs, and/or historical plaquing.</p>
11	 <p>Fieldstone weir, steps and ashlar stone terrace wall.</p>	<p><b>Maintained in situ:</b> This feature would be not be removed. If a proposed retaining wall is built it could be maintained in the landscape but would be impacted by loss of flow.</p>	<p>May require repairs. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant. The installation of a closed water loop system would give periodic appearance of creek flow.</p>
12	 <p>Ashlar cut limestone terrace wall.</p>	<p><b>Maintained in situ:</b> Feature could be maintained as the creek realignment could avoid it.</p>	<p>May require repairs. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant.</p>

**Table 3: Current Heritage Resource Photographs with Impacts and Mitigation**

No	Photo	Impacts	Recommended Mitigation
13	 <p data-bbox="298 667 824 695">Confluence of creek and intermittent stream.</p>	<p data-bbox="911 317 1084 373"><b>Relocation or Removal:</b></p> <p data-bbox="911 380 1133 499">The existing intermittent stream would be filled and re-graded.</p>	<p data-bbox="1170 317 1403 373">The confluence will be relocated.</p>
14	 <p data-bbox="298 1087 867 1178">Fieldstone weir with cut stone terrace wall. New channel would tie into existing creek just west of #14.</p>	<p data-bbox="911 701 1084 758"><b>Maintained in situ:</b></p> <p data-bbox="911 764 1138 1129">This feature does not need to be removed. An overflow channel could be incorporated so that the feature will be reconnected during high-flow stages (i.e., flows greater than the 2-year discharge).</p>	<p data-bbox="1170 701 1419 1094">May require repairs. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant. The installation of a closed water loop system would give periodic appearance of creek flow.</p>
15	 <p data-bbox="298 1619 867 1709">Roughly squared stones cut from the limestone quarry and fieldstone east entrance wall, curved with sentinel stones.</p>	<p data-bbox="911 1220 1062 1247"><b>Relocation:</b></p> <p data-bbox="911 1253 1138 1703">This feature would be removed due to grading needed for road widening and multi-use path. Road widening without moving this feature would result in less visibility of feature, potential damage due to grading requirements, snow and salt issues.</p>	<p data-bbox="1170 1220 1419 1703">This structure would be removed and reconstructed back further from the road by skilled heritage masons. The details of the reconstruction would be decided during the preparation of a Conservation Plan by a qualified heritage consultant. See Drawing 1 on page 4.</p>



**Table 3: Current Heritage Resource Photographs with Impacts and Mitigation**










No	Photo	Impacts	Recommended Mitigation
16	 <p data-bbox="300 724 868 808">Roughly squared stones cut from the limestone quarry and fieldstone west entrance wall, curved with sentinel stones.</p>	<p><b>Relocation:</b> This feature would be removed due to grading needed for road widening and multi-use path.</p>	<p>This structure would be removed and reconstructed back further from the road by skilled heritage masons. The details of the reconstruction would be decided during the preparation of a Conservation Plan by a qualified heritage consultant. See Drawing 1 on page 4.</p>
17	 <p data-bbox="300 1249 673 1270">Stone and concrete road bridge.</p>	<p><b>No Impact:</b> Feature to remain in existing location.</p>	<p>May require repairs. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant.</p>
18	 <p data-bbox="300 1619 820 1640">Fieldstone steps to the south of road bridge.</p>	<p><b>No Impact:</b> Feature to remain in existing location.</p>	<p>May require repairs. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant.</p>



Table 3: Current Heritage Resource Photographs with Impacts and Mitigation			
No	Photo	Impacts	Recommended Mitigation
19	 <p>Entrance sign, ashlar, rock-faced limestones with jack arch.</p>	<p><b>No Impact:</b> Feature to remain in existing location.</p>	<p>May require repairs. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant.</p>
20	 <p>Ashlar dry stone wall.</p>	<p><b>No Impact:</b> Feature is located within the floodplain and will not be impacted by proposed channel works. Feature is to remain in existing location.</p>	<p>May require repairs. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant.</p>
21	 <p>Willowbank Hall (B13498) - North-East Elevation Willowbank Hall.</p>	<p><b>No Impact:</b> Feature to remain in existing location.</p>	<p>If it is to be part of the Conservation Plan, it may be rehabilitated. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant.</p>



**Table 3: Current Heritage Resource Photographs with Impacts and Mitigation**

No	Photo	Impacts	Recommended Mitigation
22	 <p data-bbox="300 688 898 961">Fieldstone weir.</p>	<p data-bbox="914 317 1133 380"><b>Relocation or Removal:</b></p> <p data-bbox="914 380 1133 499">This feature would be removed as a result of channel work.</p>	<p data-bbox="1175 317 1411 926">If possible, relocation within the GCC or to other parts of Guelph in order to better accommodate conservation and adaptive reuse. The appropriate context of the resource must be considered in relocation. Partial salvage, documentation through measured drawings and high-resolution digital photographs, and/or historical plaquing.</p>
23	 <p data-bbox="300 1293 898 1493">Fieldstone weir and culvert.</p>	<p data-bbox="914 961 1133 1024"><b>Maintained in situ:</b></p> <p data-bbox="914 1024 1133 1241">Feature would be maintained in landscape but would be impacted by loss of flow as a result of channel realignment.</p>	<p data-bbox="1175 961 1411 1486">May require repairs. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant. Where possible, creek realignment design should incorporate the 'high-flow' channel to convey higher flows over the weir structure.</p>
24	 <p data-bbox="300 1845 898 1873">Fieldstone weir and culvert.</p>	<p data-bbox="914 1493 1133 1556"><b>Relocation or Removal:</b></p> <p data-bbox="914 1556 1133 1738">This feature would be removed as a result of channel work and grading for roadway and pathway.</p>	<p data-bbox="1175 1493 1411 1709">Partial salvage, documentation through measured drawings and high-resolution digital photographs, and/or historical plaquing.</p>

**Table 3: Current Heritage Resource Photographs with Impacts and Mitigation**

No	Photo	Impacts	Recommended Mitigation
25	 <p data-bbox="298 699 487 730">Fieldstone weir.</p>	<p data-bbox="911 317 1084 373"><b>Relocation or Removal:</b></p> <p data-bbox="911 380 1130 562">This feature would be removed as a result of channel work and grading for roadway and pathway.</p>	<p data-bbox="1170 338 1416 926">If possible, relocation within the GCC or to other parts of Guelph in order to better accommodate conservation and adaptive reuse. The appropriate context of the resource must be considered in relocation. Partial salvage, documentation through measured drawings and high-resolution digital photographs, and/or historical plaquing.</p>
26	 <p data-bbox="298 1367 487 1398">Fieldstone weir.</p>	<p data-bbox="911 968 1084 1024"><b>Relocation or Removal:</b></p> <p data-bbox="911 1031 1130 1146">This feature would be removed as a result of channel work.</p>	<p data-bbox="1170 968 1416 1577">If possible, relocation within the GCC or to other parts of Guelph in order to better accommodate conservation and adaptive reuse. The appropriate context of the resource must be considered in relocation. Partial salvage, documentation through measured drawings and high-resolution digital photographs, and/or historical plaquing.</p>

**Table 3: Current Heritage Resource Photographs with Impacts and Mitigation**



No	Photo	Impacts	Recommended Mitigation
27	 <p data-bbox="298 709 894 919">Limestone pillars with wood board fencing leading to main entrance.</p>	<p data-bbox="911 317 1148 533"><b>Relocation or Removal:</b> This feature would be removed due to grading needed for road widening and multi-use path.</p>	<p data-bbox="1170 317 1416 926">If possible, relocation within the GCC or to other parts of Guelph in order to better accommodate conservation and adaptive reuse. The appropriate context of the resource must be considered in relocation. Partial salvage, documentation through measured drawings and high-resolution digital photographs, and/or historical plaquing.</p>
28	 <p data-bbox="298 1398 894 1839">Metal and wood pedestrian bridge.</p>	<p data-bbox="911 932 1148 1234"><b>Potential Modification or Removal:</b> Potential for feature to be modified to accommodate pedestrian traffic or removed due to channel works.</p>	<p data-bbox="1170 932 1416 1818">The modifications to be developed during the preparation of a Conservation Plan by a qualified heritage consultant. If possible, relocation within the GCC or to other parts of Guelph in order to better accommodate conservation and adaptive reuse. The appropriate context of the resource must be considered in relocation. If removal is required, partial salvage, documentation through measured drawings and high-resolution digital photographs, and/or historical plaquing.</p>



Table 3: Current Heritage Resource Photographs with Impacts and Mitigation			
No	Photo	Impacts	Recommended Mitigation
29	 <p>Box culvert at confluence of Clythe Creek and Hadati Creek.</p>	<p><b>Potential Modification:</b> Culvert may be extended to accommodate roadway grading requirement and CSP replacement.</p>	<p>No Mitigation required.</p>
30	 <p>Concrete and stone weir.</p>	<p><b>Maintained in situ:</b> Feature would be maintained in landscape but would be impacted by loss of flow as a result of channel realignment.</p>	<p>May require repairs. This would be decided during the preparation of a Conservation Plan by a qualified heritage consultant. Were possible, creek realignment design should incorporate the 'high-flow' channel to convey higher flows over the weir structure.</p>
31	 <p>GJR railroad bridge.</p>	<p><b>No Impact:</b> Feature to remain in existing condition.</p>	

## 5.0 Mitigation

The Ministry of Tourism, Culture and Sport in Info Sheet #2, entitled *Cultural Heritage Landscapes*, states that:

*The conservation of a significant cultural heritage landscape considers not only the preservation of specific features which make up the landscape, but also the relationships of such features inside and outside its boundaries. Consideration should also be given to the surrounding context within which a cultural heritage landscape is located and the need for conservation strategies such as buffer zones.*

The Ontario Heritage Act enables municipalities to identify, list and protect properties with cultural heritage value or interest. It also gives municipalities and the Ontario Heritage Trust the ability to hold heritage conservation easements on real property. The Ontario Heritage Trust, an agency of the Ministry of Culture, is dedicated to identifying, preserving, protecting and promoting Ontario's rich and varied heritage resources.

Info Sheet #5, entitled *Heritage Impact Assessments and Conservation Plans*, suggests that municipalities and approval authorities can further enhance their own heritage preservation objectives by using heritage impact assessments and conservation plans.

Info Sheet #5 also lists some of the negative impacts that can affect a cultural heritage resource:

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

Mitigation, according to the MTCS, in Info Sheet #5, allows for the avoidance or minimization of negative impacts on a cultural heritage resource and may include:

- Alternative *development* approaches;
- Isolating *development* and *site alteration* from *significant* built and natural features and vistas;
- Design guidelines that harmonize mass, setback, setting, and materials;
- Limiting height and density;
- Allowing only compatible infill and additions;
- Reversible alterations; and
- Buffer zones, site plan control and other planning mechanisms.

While the development approaches that have been currently determined for the York Road improvements, leave few options for mitigation of the heritage resources, suggestions are itemized below. The heritage resources of the former GCC lands that front York Road in the City of Guelph, are unique and highly valued and, as such, would require careful planning. They include stone wing walls, a creek with multiple weirs, retaining walls and stairways, ponds and both vehicular and pedestrian bridges and form an extensive landscape enjoyed both in the past and the present by the Guelph community.

The wing walls (Table 3: #15 and #16) at the entrance off York Road to the GCC would need to be dismantled and reconstructed with the east wall in the approximate same location but extended by 7 m so that the end treatment does not conflict with the existing in-water feature. The west wall would be moved further south, away from the roadway and out of the clear zone. If the walls were left in the current locations, a guardrail would need to be placed approximately 0.5 m to 1.5 m in front of the walls, and with the walls remaining partially buried, the view of the walls would be greatly diminished. There would also be a possibility of damage to the walls during the road construction. In addition, snow could be piled up next to them due to the lack of space from the road and multi-use pathway. This could potentially also result in structural damage to the walls.

A qualified heritage stone mason would be required to document the location of key stones by a numbering system as preparation for the carefully relocation of the existing walls according to an approved Conservation Plan. Interpretive signage would add to the understanding of the significance of the walls.

Although the west wall would be further south and the east wall would be extended, the rebuilding of the two walls would bring the walls closer to the original 1920 appearance. This, along with



interpretive signage, would improve the public's view and understanding of the history of the entranceway.



**Photograph 4: 1920's Picture of Dry Stone Wing Wall with Circular End Treatment. The height of the wall is noticeably taller. The existing wall has been partially buried due to road grading. Photo from the Guelph Civic Museum.**

The realignment of major portions of Clythe Creek also impacts the heritage features. While some of the features would need to be removed, others would stay in situ but without regular water flow; flow would occur in some locations in large storm events. Mitigation may include the installation of a closed water loop system to give periodic appearance of creek flow.

Section 4.0 Analysis contains *Table 3: Heritage Resource Photos with Impacts and Mitigation* which shows each resource and the resulting road improvement impact and mitigation suggestion. The changes would include removal of the cast-in-place concrete culvert (#1) which travels under York Road; the remnant bridge railing on the north side of York Road (#2); the intermittent stream which feeds into Clythe Creek (#13) and the field stone weirs #22, 24, 25, and 26; and the limestone pillars and wood board fencing alongside York Road (#27). Some field stone weirs and steps would remain in situ but without water flow (these include stone weirs #3, 5, 8, 23 and #30 which is cast-in place concrete). Were possible, creek realignment design should incorporate the 'high-flow' channel to convey higher flows over the weir structures.

Field stone weirs #9, 10, 11, and 14 and the terrace wall #12 may be removed or could possibly be maintained in situ with retaining walls or grading. However, if they remain, the weirs would all be impacted by loss of flow as a result of channel realignment. The current design of the realignment of the creek bed would be relocated south of the existing creek bed just west of weir #14 with the existing bed filled in and re-graded.

Due to the road redesign, the grading of both the road and the multi-use path may impact the fieldstone steps (#6) and a large bedrock outcrop (#7), the metal and wood bridges (#28 and 29) and the box culvert (#30) due to the channel work or pedestrian traffic needs.

Any removed heritage resources should be salvaged and reused if possible. A detailed documentation and commemoration (e.g. a heritage interpretation plaque) may also be required. A heritage consultant may need to provide a list of features of value to be salvaged. This could be accomplished in a Conservation Plan. Materials may be required to be offered to heritage-related projects, on or near the GCC, prior to exploring other salvage options.

Ruinification would allow some of the resources to be maintained on the site. Symbolic conservation refers to the recovery of the appropriate resources and incorporating them into new development of the site, or possibly using a symbolic design method to depict a theme or remembrance of the history of the GCC.

## 6.0 Recommendations

In light of the preceding, it is recommended that the following mitigation measures be taken:

- 1) Since preservation in situ is not feasible for all of the heritage resources, rehabilitation, adaptive reuse and restoration must be done in a sensitive manner in order to protect the site's heritage value.
  
- 2) It is recommended that a Conservation Plan be prepared during the detailed design plan phase for improvements to York Road. A Conservation Plan would be prepared by a qualified heritage consultant and would guide the work of relocating the built heritage resources within this locally and provincially significant cultural heritage landscape. The scope of the Conservation Plan should include the following:
  - Interpretation plan and/or strategy
  - Preliminary recommendations for restoration, rehabilitation and/or adaptive reuse;
  - Critical short-term maintenance required to stabilize the heritage resources and prevent deterioration;
  - Measures to ensure interim protection of heritage resources during phases of construction or related development;
  - 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, especially in the dismantling and reassembling of the wing walls;
  - Longer term maintenance and conservation work intended to preserve existing heritage fabric and attributes;
  - 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; and,
- Compliance with recognized *Standards and Guidelines for the Conservation of Historic Places in Canada*, the *Guelph Innovation District (York District Lands) Official Plan Amendment 54*, City of Guelph Official Plan (2014) and other recognized heritage protocols and standards. As stated in the *Standards and Guidelines for the Conservation of Historic Places in Canada*, it is important to begin with a thorough understanding of the heritage value of the site, along with its condition, evolution over time, and past and current importance to the community (pg.3). The author of the Conservation Plan should work closely with the City of Guelph and the Province of Ontario (Infrastructure Ontario) to compile all available information pertinent to defining the study area's unique character-defining elements.

## **7.0 Assessor Qualifications**

This report was prepared and reviewed by the undersigned, employees of Wood Environment & Infrastructure Solutions, a division of Wood Canada Limited. Wood is one of North America's leading engineering firms, with more than 50 years of experience in the earth and environmental consulting industry. The qualifications of the assessors involved in the preparation of this report are provided in Appendix B.

## 8.0 Closure

This report was prepared for the exclusive use of the City of Guelph and is intended to provide a Heritage Impact Assessment of the study area. The property is located on York Road, City of Guelph, Ontario.

Any use which a third party makes of this report, or any reliance on or decisions to be made based on it, are the responsibility of the third party. Should additional parties require reliance on this report, written authorization from Wood will be required. With respect to third parties, Wood has no liability or responsibility for losses of any kind whatsoever, including direct or consequential financial effects on transactions or property values, or requirements for follow-up actions and costs.

The report is based on data and information collected during the field inspections conducted by Wood. It is based solely on a review of historical information and data obtained by Wood as described in this report. Except as otherwise maybe specified, Wood disclaims any obligation to update this report for events taking place, or with respect to information that becomes available to Wood after the time during which Wood conducted the archaeological assessment.

In evaluating the property, Wood has relied in good faith on information provided by other individuals noted in this report. Wood has assumed that the information provided is factual and accurate. In addition, the findings in this report are based, to a large degree, upon information provided by the current owner/occupant. Wood accepts no responsibility for any deficiency, misstatement or inaccuracy contained in this report as a result of omissions, misinterpretations or fraudulent acts of persons interviewed or contacted.

Wood makes no other representations whatsoever, including those concerning the legal significance of its findings, or as to other legal matters touched on in this report, including, but not limited to, ownership of any property, or the application of any law to the facts set forth herein. With respect to regulatory compliance issues, regulatory statutes are subject to interpretation and change. Such interpretations and regulatory changes should be reviewed with legal counsel. This report is also subject to the further Standard Limitations contained in Appendix C.



We trust that the information presented in this report meets your current requirements. Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Respectfully Submitted,

Wood, Environment & Infrastructure,  
a Division of Wood Canada Limited

**Prepared by,**



Linda Axford, MLA, CAHP  
Senior Heritage Specialist

**Reviewed by,**



Shaun Austin, Ph.D.  
Associate Archaeologist (P141)

## 9.0 Bibliography

Chapman, L.J., & D.F. Putnam

1984 *The Physiography of Southern Ontario*. Third Edition. Toronto, Ontario: Ontario Geological Survey.

City Beautiful Movement

2017 <http://vancouverpublicspace.ca/2016/02/04/the-city-beautiful-movement-urban-design-and-moral-well-being/>

City of Guelph

2018 City of Guelph Official Plan, March 2018 Consolidation.

2005 York District Land Use & Servicing Study: Background Report (March 17, 2005).

2007 York Road Improvements *Wyndham Street South to East City Limits Class Environmental Assessment*, (February 2007).

2014 *Guelph Innovation District (York District Lands) Official Plan Amendment 54*, City of Guelph Official Plan.

2018 *Cultural Heritage Action Plan: Background Report*, City of Guelph.

Government of Canada:

2010 *Standards and Guidelines for the Conservation of Historic Places in Canada*, Second Edition.

Government of Ontario:

1990 *Environmental Assessment Act RSO 1990*. Queen's Printer, Toronto.

1990 *Ontario Heritage Act RSO 1990*. Queen's Printer, Toronto.

1990 *Planning Act RSO 1990*. Queen's Printer, Toronto.

2006 *Ontario Heritage Act Regulation 9/06. Criteria for Determining Cultural Heritage Value or Interest, January 2006*. Queen's Printer, Toronto.

2006 *Ontario Heritage Act Regulation 10/06. Criteria for Determining Cultural Heritage Value or Interest of Provincial Significance. January 2006*. Queen's Printer, Toronto.

2006 *Ontario Heritage Toolkit*. Ontario Ministry of Tourism, Culture and Sport Queen's Printer, Toronto.

- 2012 *Cultural Heritage Landscapes – An Introduction*, Ontario Heritage Trust.  
[www.heritagetrust.on.ca/user\\_assets/documents/HIS-020-Cultural-heritage-landscapes-An-introduction-ENG.pdf](http://www.heritagetrust.on.ca/user_assets/documents/HIS-020-Cultural-heritage-landscapes-An-introduction-ENG.pdf)
- 2006 *Ontario Realty Corporation (Infrastructure Ontario)*  
*Cultural Heritage Assessment Report: Former Guelph Correctional Centre (N00249)*, June 2006.
- 2009 *Ontario Realty Corporation (Infrastructure Ontario)*  
*Conservation Plan for the Guelph Correctional Centre* (Content Works).
- 2018 *Infrastructure Ontario*  
*Strategic Conservation Plan: N00249 Guelph Correction Centre* (May 2018).
- 2013 *Preliminary Heritage Easement Assessment by Ontario Heritage Trust Staff, (for the Guelph Correctional Centre)*, Ontario Heritage Trust, November 6, 2013.
- 2014 *Provincial Policy Statement*. Ministry of Municipal Affairs and Housing  
Queen's Printer, Toronto.

*Grottenthaler, Karl*

2010 *The House on the Hill, One hundred years of Memories*. Self-published.

*Guelph in Postcards*

2017 <http://guelphpostcards.blogspot.ca/search/label/Guelph%20Correctional%20Centre>

*Guelph Mercury*

2011 *A gift to the city: Prison labour created much-loved ponds off York Road*. September 24, 2011.

*Historical Atlas Publishing Company*

1906 *Illustrated Historical Atlas of the County of Wellington*. Toronto.

*Meek, Margaret Anne*

1979 *History of the City Beautiful Movement in Canada 1890-1930*. University of British Columbia, Vancouver.

*Pope, J.H.*

1877 *Illustrated Historical Atlas of the County of Wellington*. Walkers and Miles, Toronto.

*Toronto Public Library*

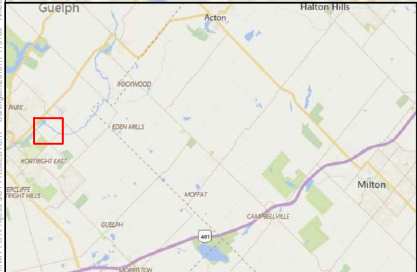
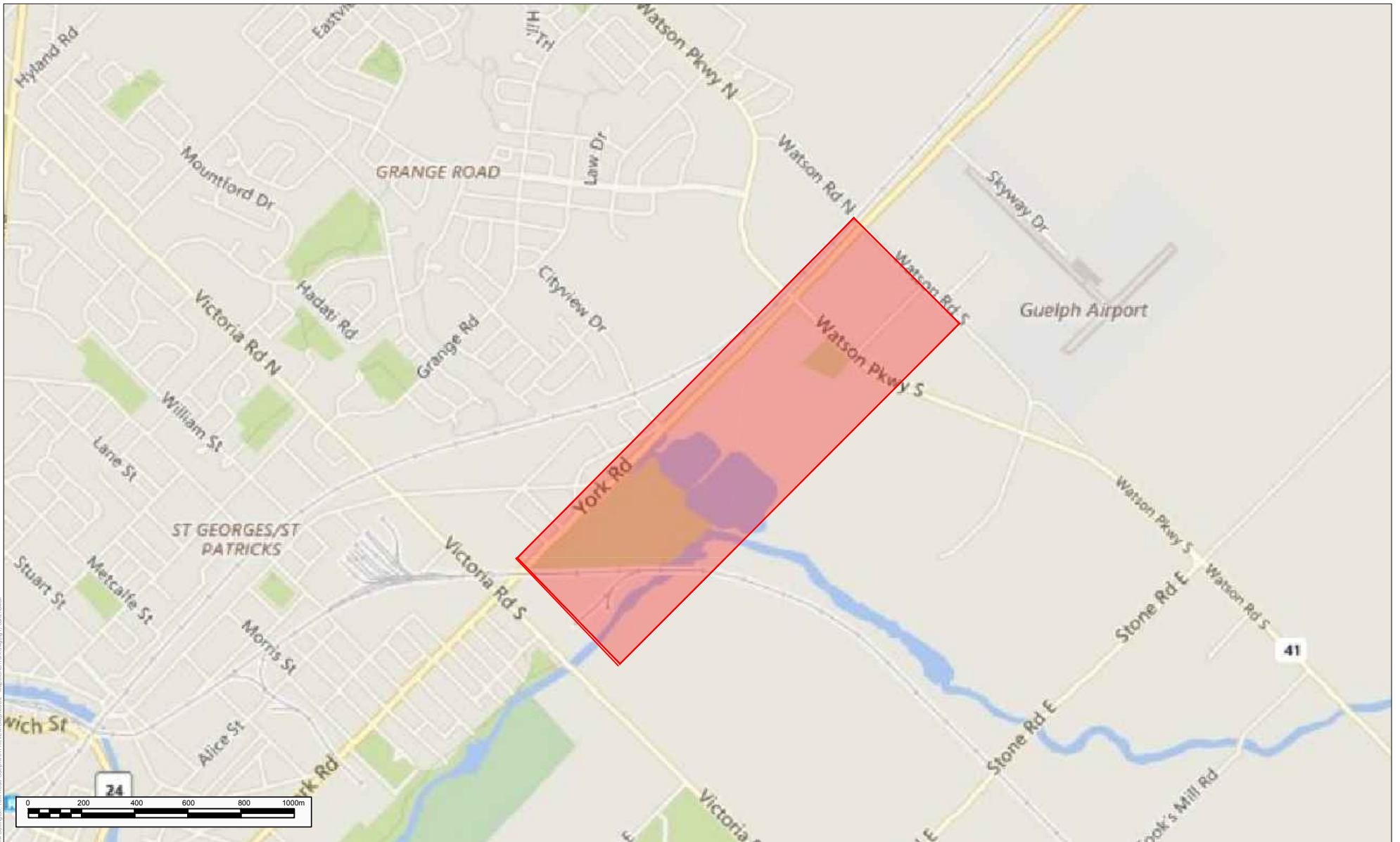
2019 <https://www.torontopubliclibrary.ca/search.jsp?Erp=20&N=&No=20&Ntt=Ontario+Reformatory+Guelph+%28Ont.%29&view=grid>


Guy Leslie and Charles J. Wheelock

1861 Wheelock's Map of the County of Wellington, Canada West, University of Toronto Map and Data Library.

# **Appendix A**

## **Figures**



<b>LEGEND</b>	
	Study area

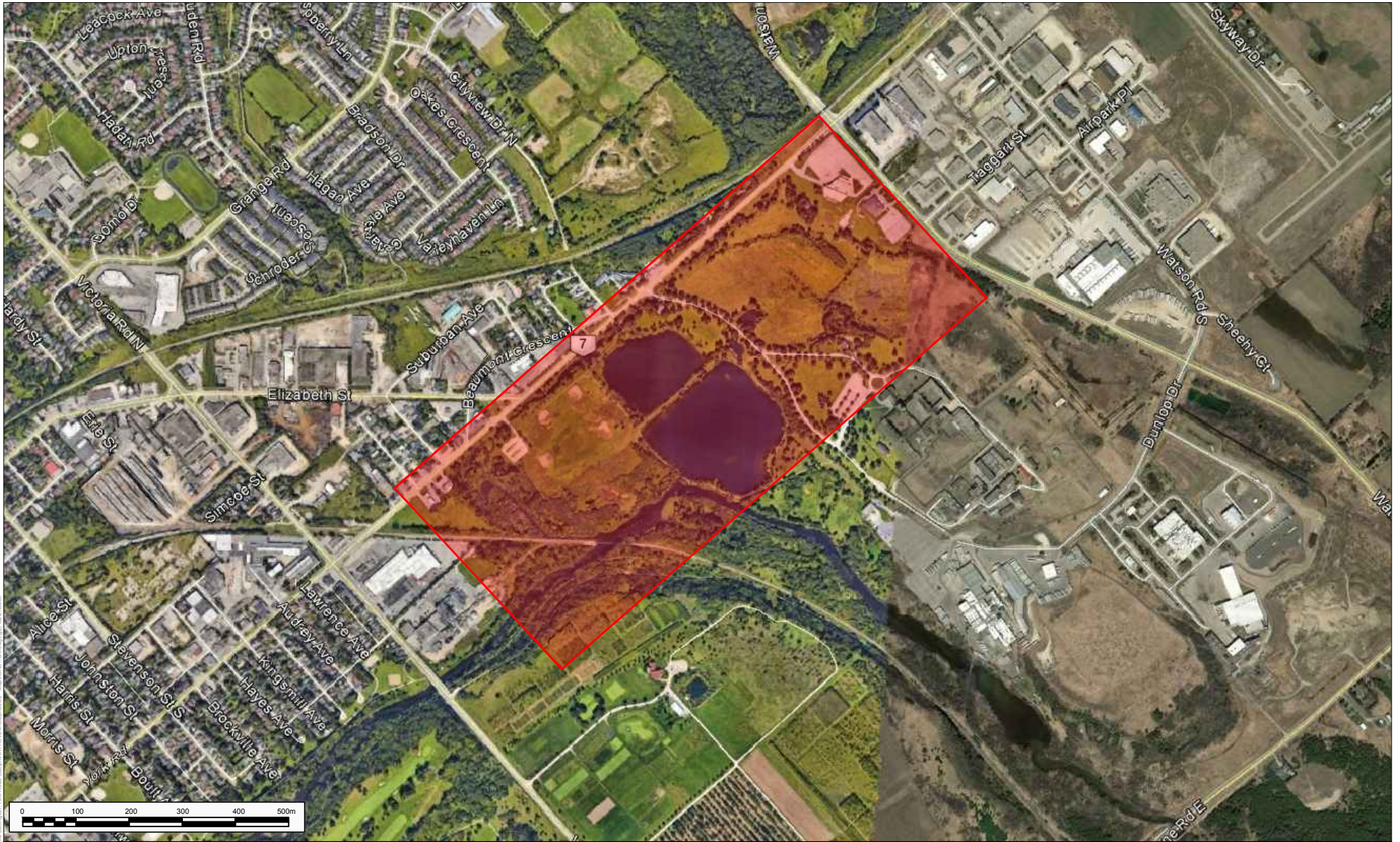
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 THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH THE AMEC ENVIRONMENT & INFRASTRUCTURE REPORT No. TP115100.  
 Conditions encountered in the field may be different from the interpreted information presented on this figure.  
 SOURCE: Canadian Topographic maps [http://www.gisapplication.lrc.gov.on.ca/matrix/index.htm?site=Make\\_A\\_Topographic\\_Map&viewer=MATM&locale=en-US](http://www.gisapplication.lrc.gov.on.ca/matrix/index.htm?site=Make_A_Topographic_Map&viewer=MATM&locale=en-US)

CLIENT:	CITY OF GUELPH
Drawn By:	CH
Checked By:	SA
Revision N°:	01
Scale:	1: 20,000


<b>HERITAGE IMPACT ASSESSMENT</b> York Road Environmental Design Study		<b>FIGURE:</b> <b>1</b>
Location of the Study Area		
PROJECT N°:	TP115100	<b>wood.</b> Wood Environment and Infrastructure Solutions 3450 Harvester Road, Suite 100, Burlington, ON L7N 3W5 tel: 905-335-2353 www.woodplc.com
DATE:	01 Mar 2019	







**LEGEND**

 Study area

**NOTES:**

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Conditions encountered in the field may be different from the interpreted information presented on this figure.

SOURCE: Bing Maps

**CLIENT:**

CITY OF GUELPH

**HERITAGE IMPACT ASSESSMENT**  
York Road Environmental Design Study

Drawn By: CH

Checked By: SA

Revision N°: 01

Scale: 1: 10,000

PROJECT N°: TP115100

DATE: 01 Mar 2019

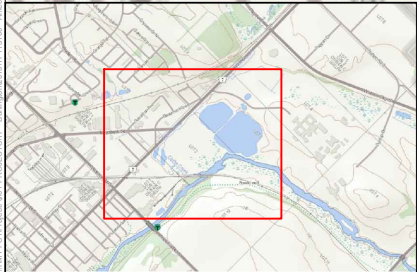
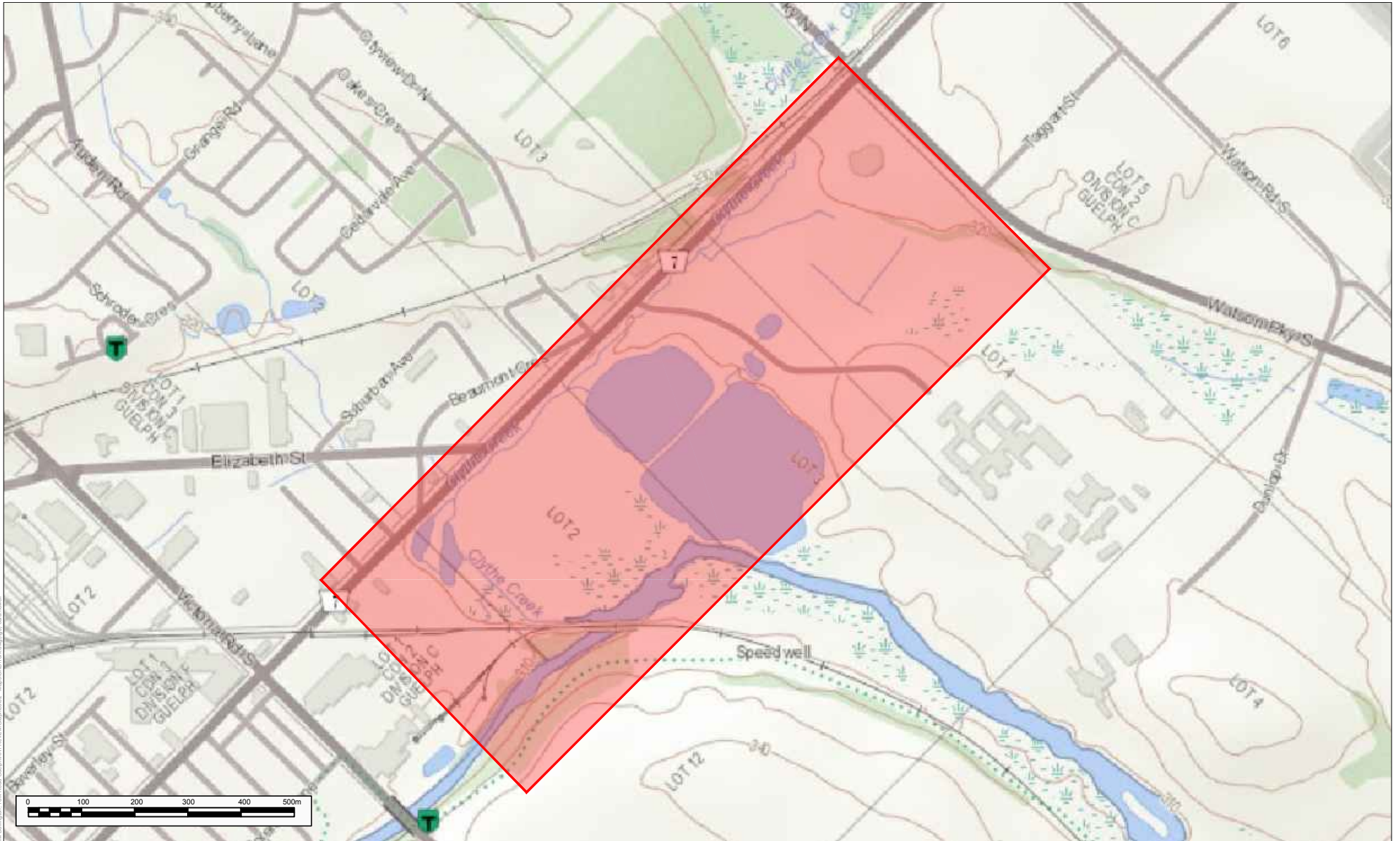
**FIGURE:**  
**2**



Wood Environment and Infrastructure Solutions  
3450 Harvester Road, Suite 100, Burlington, ON L7N 3W5  
tel: 905-335-2353 www.woodplc.com







**LEGEND**

Study area

**NOTES:**


THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH THE AMEC ENVIRONMENT & INFRASTRUCTURE REPORT No. TP115100.

Conditions encountered in the field may be different from the interpreted information presented on this figure.

SOURCE: Canadian Topographic maps  
[http://www.gisapplication.lrc.gov.on.ca/main/index.htm?site=Main\\_A](http://www.gisapplication.lrc.gov.on.ca/main/index.htm?site=Main_A)  
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**CLIENT:**  
CITY OF GUELPH

Drawn By: CH  
 Checked By: SA  
 Revision N°: 01  
 Scale: 1: 10,000



**HERITAGE IMPACT ASSESSMENT**  
York Road Environmental Design Study

**Topographic Map Showing the Location of the Study Area**

PROJECT N°: TP115100  
 DATE: 01 Mar 2019

Wood Environment and Infrastructure Solutions  
 3450 Harvester Road, Suite 100, Burlington, ON L7N 3W5  
 tel: 905-335-2353 www.woodplc.com

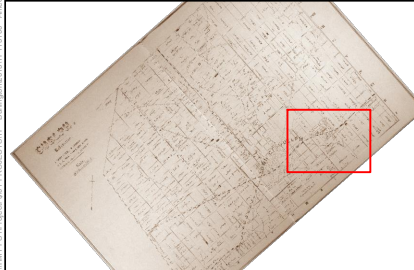
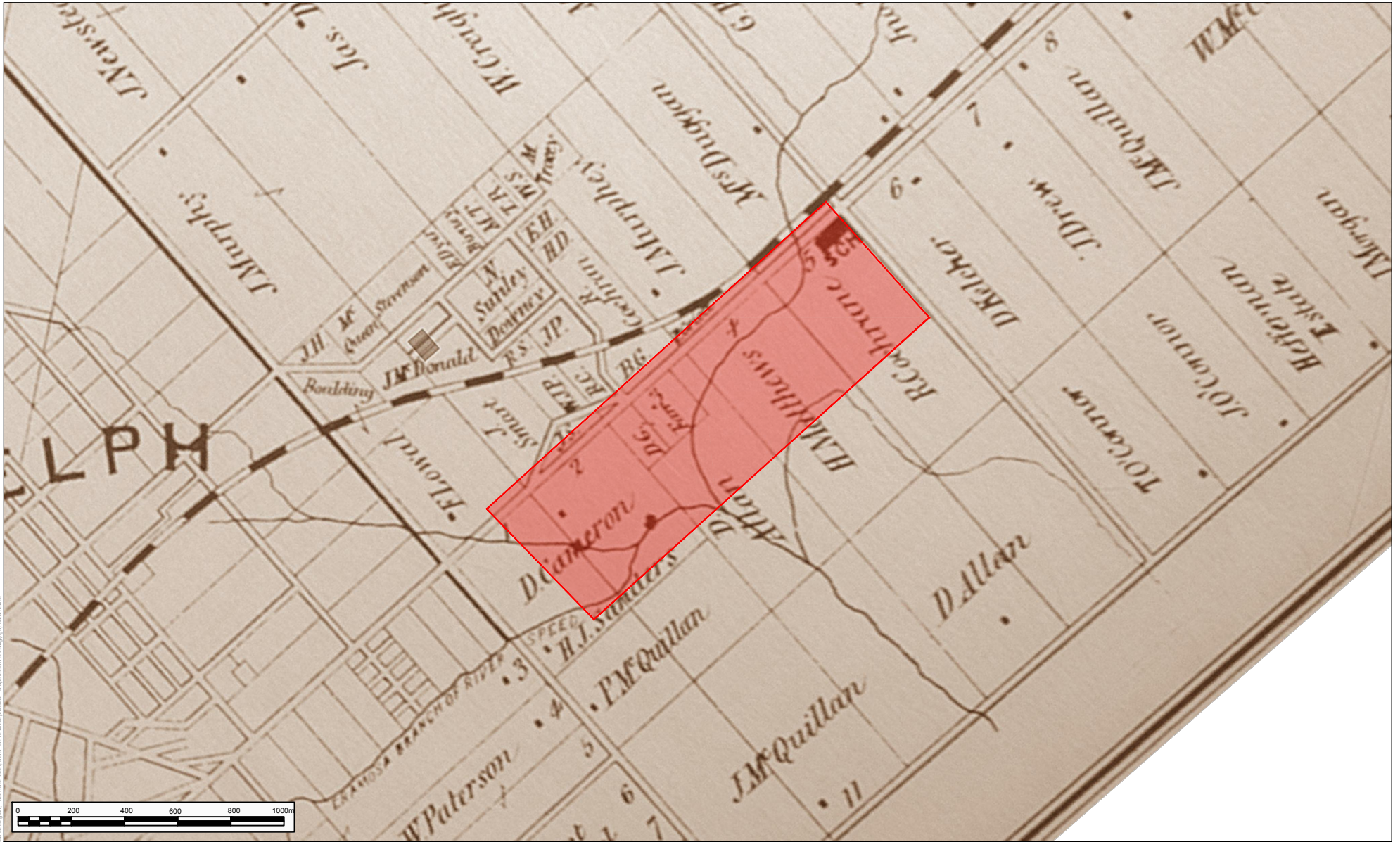
**wood.**

**FIGURE: 3**










**LEGEND**

 Study area

**NOTES:**

THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH THE AIEC ENVIRONMENT & INFRASTRUCTURE REPORT No. TP115100.

Conditions encountered in the field may be different from the interpreted information presented on this figure.

SOURCE: 1877 Illustrated Historical Atlas of the County of Wellington

**CLIENT:**

CITY OF GUELPH

Drawn By: CH

Checked By: SA

Revision N°: 01

Scale: 1: 20,000



**HERITAGE IMPACT ASSESSMENT**  
York Road Environmental Design Study

1877 Illustrated Historical Atlas of the County of Wellington Showing the Location of the Study Area

PROJECT N°: TP115100

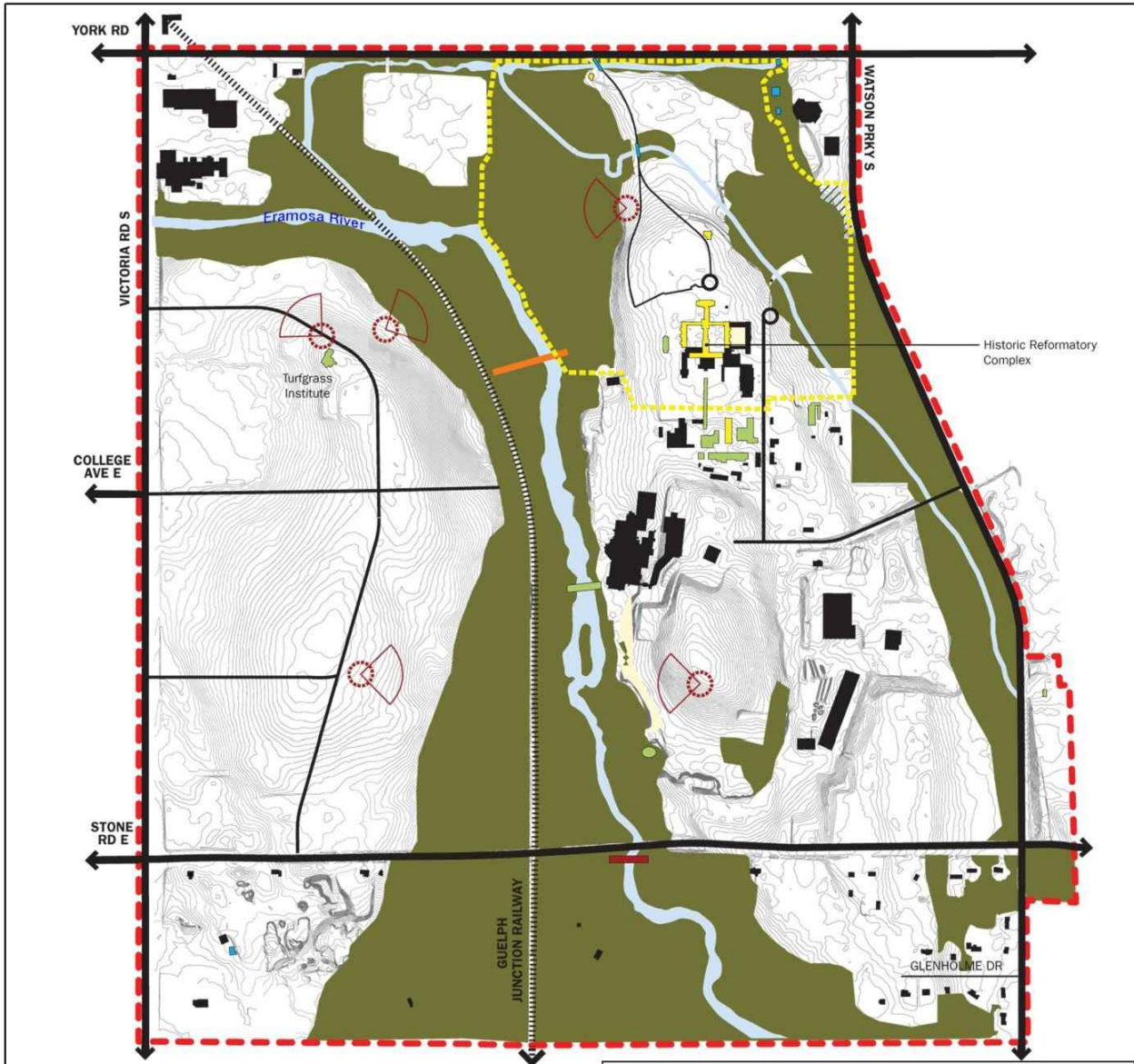
DATE: 01 Mar 2019

**FIGURE: 5**

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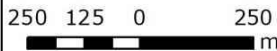
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**Legend**

- Secondary Plan Boundary
- Roads
- Railway
- Pedestrian Crossings
- Existing Built Form
- Public Views
- Waterbody
- Natural Heritage System
- Contours (0.5m intervals)

**Cultural Heritage Resources (CHR)**

- Non-Listed CHR
- Municipally Listed CHR
- Provincially Listed CHR
- Designated CHR (Part IV O.H.A)
- Cultural Heritage Landscape



Produced by the City of Guelph  
Planning Services  
August 2017

**CITY OF GUELPH  
OFFICIAL PLAN  
APPENDIX A:  
GUELPH INNOVATION DISTRICT  
SECONDARY PLAN  
HERITAGE**



**LEGEND**

Indicated Above

**NOTES:**

THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH THE AMEC ENVIRONMENT & INFRASTRUCTURE REPORT No. TP115100.

Conditions encountered in the field may be different from the interpreted information presented on this figure.

SOURCE: City of Guelph, Official Plan, Appendix A: Guelph Innovation District Secondary Plan, heritage

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**HERITAGE IMPACT ASSESSMENT  
York Road Environmental Design Study**

Guelph Innovation District,  
Secondary Plan, Heritage

PROJECT N°: TP115100

DATE: 01 Mar 2019

**FIGURE:**

**6**

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**LEGEND**

- Study area
- Proposed realignment Clythe Creek
- # Cultural heritage feature/structure

**NOTES:**  
 THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH THE AMEC ENVIRONMENT & INFRASTRUCTURE REPORT No. TP115100.

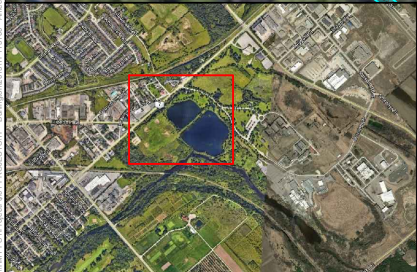
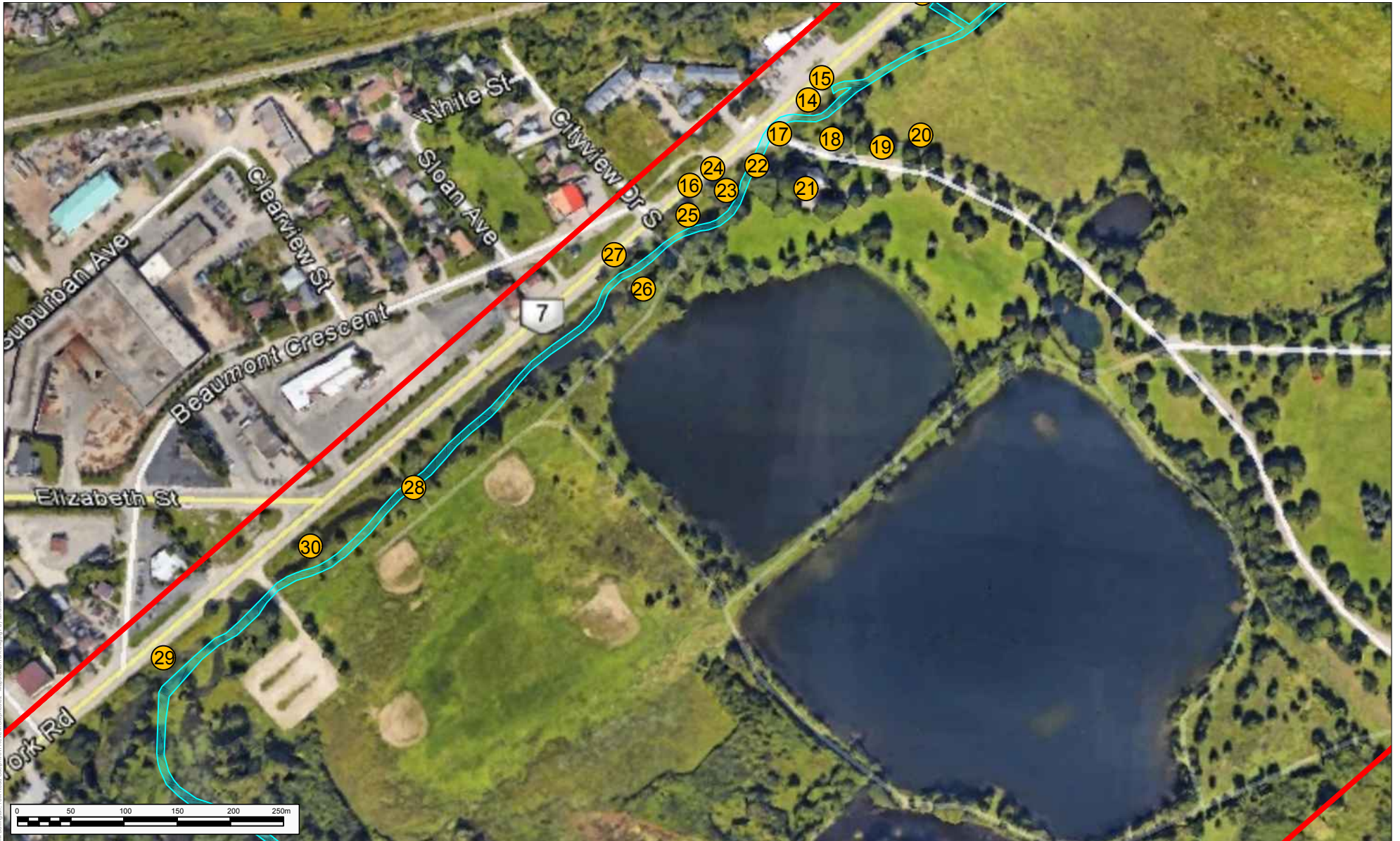
Conditions encountered in the field may be different from the interpreted information presented on this figure.

SOURCE: Bing Maps

<b>CLIENT:</b> CITY OF GUELPH	
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<b>HERITAGE IMPACT ASSESSMENT</b> York Road Environmental Design Study	
Cultural Heritage Features/Structures within the Study Area	
PROJECT N°:	TP115100
DATE:	01 Mar 2019
<b>FIGURE:</b> <span style="font-size: 24pt;"><b>7a</b></span>	
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**LEGEND**

- Study area
- Proposed realignment Clythe Creek
- # Cultural heritage feature/structure

**NOTES:**  
 THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH THE AMEC ENVIRONMENT & INFRASTRUCTURE REPORT No. TP115100.

Conditions encountered in the field may be different from the interpreted information presented on this figure.

SOURCE: Bing Maps

**CLIENT:**  
 CITY OF GUELPH

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Revision N°: 01  
 Scale: 1: 5,000

**HERITAGE IMPACT ASSESSMENT**  
 York Road Environmental Design Study

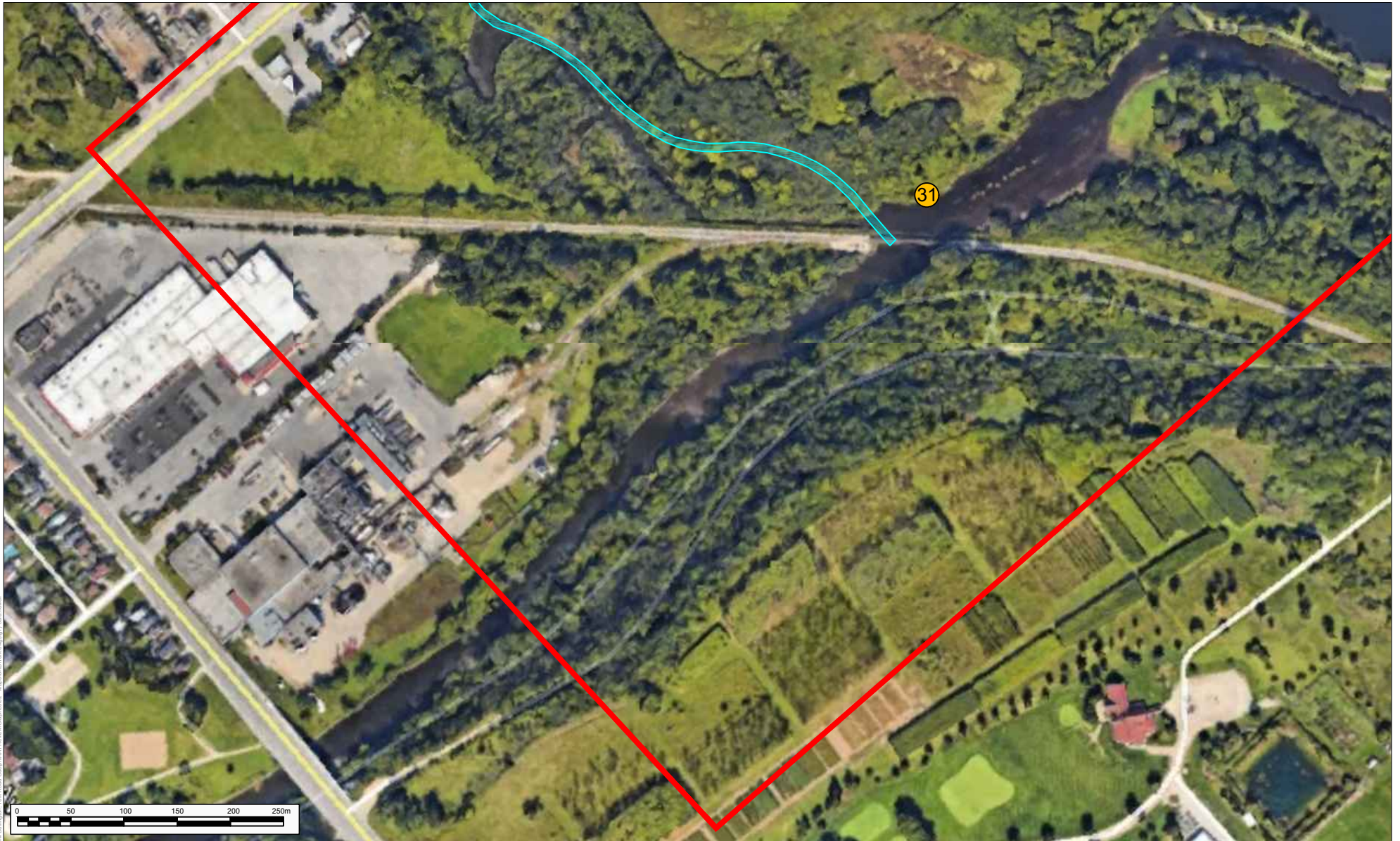
**Cultural Heritage Features/Structures within the Study Area**

PROJECT N°: TP115100  
 DATE: 01 Mar 2019

**FIGURE: 7b**

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**LEGEND**

- Study area
- Proposed realignment Clythe Creek
- # Cultural heritage feature/structure

**NOTES:**

THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH THE AMEC ENVIRONMENT & INFRASTRUCTURE REPORT No. TP115100.

Conditions encountered in the field may be different from the interpreted information presented on this figure.

SOURCE: Bing Maps

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Scale:

1: 5,000



**HERITAGE IMPACT ASSESSMENT**  
York Road Environmental Design Study

**Cultural Heritage Features/Structures within the Study Area**

PROJECT N°:

TP115100

DATE:

01 Mar 2019

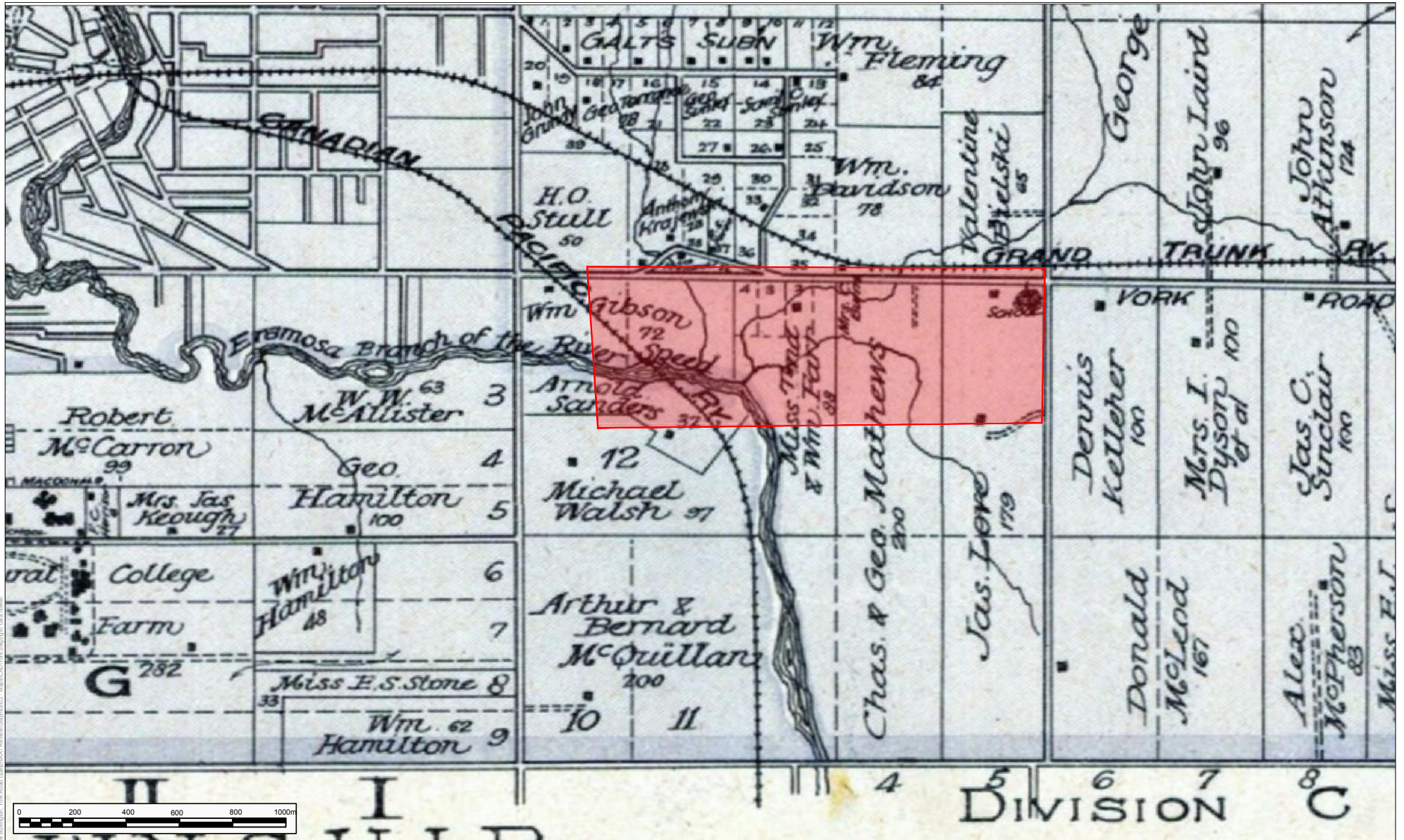
**FIGURE:**


**7c**

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LEGEND	
	Study area

NOTES:  
 THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH THE AMEC ENVIRONMENT & INFRASTRUCTURE REPORT No. TP115100.

Conditions encountered in the field may be different from the interpreted information presented on this figure.

SOURCE: 1877 Illustrated Historical Atlas of the County of Wellington

CLIENT:	CITY OF GUELPH
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Checked By:	SA
Revision N°:	01
Scale:	1: 20,000

<b>HERITAGE IMPACT ASSESSMENT</b> York Road Environmental Design Study	
1906 Illustrated Historical Atlas of the County of Wellington Showing the Location of the Study Area	
PROJECT N°:	TP115100
DATE:	01 Mar 2019
<b>FIGURE: 8</b>	
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**Appendix B**  
**Assessor Qualifications**

## Assessor Qualifications

**Linda Axford, MLA, Senior Heritage Specialist, Role: Heritage Fieldwork and Research, Report Writer** – Ms. Axford has been working in heritage planning since 2001. She has conducted historical background research, field surveys, analysis of built heritage and cultural landscapes and report writing. She has worked in municipal government and is very knowledgeable about federal and provincial planning policy as it relates to heritage. She holds a master's Degree in landscape architecture, an Honours Bachelor of Arts in History and is a **professional member of the Canadian Association of Heritage Professionals.**

**Shaun Austin, Ph.D., Associate Archaeologist, Role: QA/QC Review** – Dr. Austin is the Senior Advisor to Wood's Cultural Heritage Resources Group in Ontario and is based in the Burlington Office. He has been working in Canadian archaeology and heritage since 1976 and as an archaeological and heritage consultant in Ontario since 1987. He is a dedicated cultural heritage consultant with repeated success guiding projects through to completion to the satisfaction of development proponents, Indigenous nations and cultural heritage stakeholder groups. His areas of interest and expertise include pre-contact Aboriginal lithics and ceramics. Dr. Austin holds a Professional License (P141) in Archaeology, is MTO RAQs certified in Archaeology/Heritage and is a professional member of the Ontario Association of Professional Archaeologists.

**Cara Howell B.A., Senior Archaeologist, Role: Graphics Support** – Ms. Howell holds a B.A. in Anthropology and Classical Archaeology from McMaster University and provides CAD graphics support for Wood's Cultural Heritage Resources Group in Ontario. She holds an Applied Research Licence (R180) in Archaeology and has become an authority on early Euro-Canadian material culture and historic period background research. As the Archaeology Laboratory Director for Wood's Cultural Heritage Resources Group in Ontario, she developed and implements a computerized cataloguing system for artifacts and other resources. Ms. Howell also serves as lead liaison with Indigenous communities.

# **Appendix C**

## **Limitations**



## Limitations

1. The work performed in the preparation of this report and the conclusions presented are subject to the following:
  - (a) The Standard Terms and Conditions which form a part of our Professional Services Contract;
  - (b) The Scope of Services;
  - (c) Time and Budgetary limitations as described in our Contract; and,
  - (d) The Limitations stated herein.
2. No other warranties or representations, either expressed or implied, are made as to the professional services provided under the terms of our Contract, or the conclusions presented.
3. The conclusions presented in this report were based, in part, on visual observations of the Study Area. Our conclusions cannot and are not extended to include those portions of the Study Area which were not reasonably available, in Wood's opinion, for direct observation.
4. The potential for heritage resources, and any actual heritage resources encountered, at the Study Area were assessed, within the limitations set out above, having due regard for applicable heritage regulations as of the date of the inspection.
5. Services including a background study and property inspection were performed. Wood's work, including archival studies and a site visit were conducted in a professional manner and in accordance with the Ministry of Tourism and Culture's guidelines. It is possible that unforeseen and undiscovered heritage resources may be present at the Study Area.
6. The utilization of Wood's services during the implementation of any further heritage work recommended will allow Wood to observe compliance with the conclusions and recommendations contained in the report. Wood's involvement will also allow for changes to be made as necessary to suit field conditions as they are encountered.
7. This report is for the sole use of the parties to whom it is addressed unless expressly stated otherwise in the report or contract. Any use which any third party makes of the report, in whole or in part, or any reliance thereon, or decisions made based on any information of conclusions in the report, is the sole responsibility of such third party. Wood accepts no responsibility whatsoever for damages or loss of any nature or kind suffered by any such third party as a result of actions taken or not taken or decisions made in reliance on the report or anything set out therein.
8. This report is not to be given over to any third-party other than a governmental entity, for any purpose whatsoever without the written permission of Wood, which shall not be unreasonably withheld.

