MHBC PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

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RE: Planning Consultation Stage 2 Comments – Heritage Impact Assessment - 1880 Assumption Street, Windsor
OUR FILE: 24348C

We have reviewed City staff comments provided in the Planning Consultation Stage 2 Letter PC-091/25 dated November 14, 2025. A comment response matrix addressing staff comments pertaining to the Heritage Impact Assessment is provided below.

Staff Comment	MHBC Response
With regards to the Heritage Impact Assessment/Built Heritage Impact Study guidelines/Terms of Reference: 3. Description of proposed Site Changes/Development and Impact to the Cultural Heritage Resource iv. Provide visual depiction of subject proposal and streetscapes with neighbouring properties (e.g. composite photograph of the subject property streetscape with and without the proposed development, cross-section diagrams, for heritage areas/districts a visual contextual analysis with surrounding properties to demonstrate compatibility with common datum regulating lines and floor to height ratios of surrounding heritage buildings) The Study submitted includes Section 6.0 Description of Proposed Development, along with conceptual renderings showing multiple perspectives of the proposed development within the neighbourhood and streetscape. However, the relationship between the height	The requested comparisons are available in Section **4.2 of the Urban Design Study**, which concludes that the proposed development complies with the applicable policies and guidelines.

of the proposed building and the height of other buildings within the proximity is unclear. **Submit an elevation drawing to demonstrate comparable heights. Show the proposed building along the same horizontal plane as other notable buildings within Walkerville. Use horizontal datum lines, floor-to-height ratios, and proper scale for all buildings:** • **Walker Power Building (325 Devonshire Rd)** • **Hiram Walker Grain Silos (1950 Riverside Dr E)** • **Crown Inn (378-396 Devonshire Rd)** • **Hiram Walker Warehouses (480, 500, and 525 Argyle Rd)** • **Club Lofts Condominium (2175 Wyandotte St E)** • **Walkerville Garage (420 Kildare Rd)** • **Mayor J.E. Dobie House (423 Kildare Rd)** • **Windsor-Essex Children's Aid Society (1671 Riverside Dr E)**	
With regards to the Heritage Impact Assessment/Built Heritage Impact Study guidelines/Terms of Reference: 4. Analysis of Development Impact i. Demonstrate that policies from the City of Windsor Official Plan and the Provincial Policy Statement have been addressed. Address Windsor Intensification Guidelines (June 2022) resulting from the Multi-Residential Interim Control By-law Study where relevant. The Study submitted includes Section 7.4 Compatibility with City's Official Plan and Relevant Guidelines which lacks details about how the following Official Plan policies are addressed:	The Heritage Impact Assessment and Urban Design Study have been updated to address these points, specifically. The impact analyses which are available in **Section 7.0 of the Heritage Impact Assessment** have concluded that no adverse impacts are anticipated as a result of the massing, scale, form, or height of the proposed development, such as impacts from shadows or obstruction of significant views or vistas. **Section 3.4 of the Urban Design Study** provides an analysis and description of architectural and design features which reduce the perception of building mass. **Section 4.2 of the Urban Design Study** speaks to the overall scale and form of the building as well as the compatibility of the design and massing with the context. The Urban Design Study

OP s.9.3.5.1.a.(ii) Development be of compatible height, massing, scale, setback and architectural style OP s. 9.3.7.1(e)(i) Respecting the massing, profile and character of adjacent buildings; The response provided in Table 6 – Compliancy with Heritage Conservation Urban Design Guidelines speaks to the height of the 3-storey podium relative to nearby buildings and the step back of the podium. However, the response does not speak to the overall height, massing, and profile of the building which is proposed at 20-storeys (220 ft / 67 m) tall. **However, the response does not address techniques used to reduce the perception of building mass.** The response provided in Table 7 – Compliancy with City of Windsor Intensification Guidelines, "1. Locate and design buildings to respect and complement the scale, character, form, and siting of on-site and surrounding cultural heritage resources" speaks to the siting, design elements, colour palette, and cladding materiality. **However, the response does not speak to the overall scale and form of the building which is proposed at 20-storeys (220 ft / 67 m) tall.** It compares itself to larger industrial/institutional buildings like Walkerville Brewery, Distillery Towers, and Windsor-Essex Children's Aid Society. The response provided in Table 7 – Compliancy with City of Windsor Intensification Guidelines, "2. Ensure that conceptual design and massing of development or redevelopment projects are compatible with adjacent listed heritage buildings and/or sites" notes that no adverse impacts are anticipated to the adjacent listed heritage resources, therefore the development is considered compatible. **However, the response does not speak to the compatibility of the design and massing of the proposed 20-storeys (220 ft / 67**	concludes that the proposed development complies with the City of Windsor Official Plan and Intensification Guidelines and represents good urban design. Additionally, the proposed building includes the following design features which the project architect has advised were inspired by the heritage context of the surrounding area: • Segmental arched proportions at the podium. • Use of red brick and limestone-inspired concrete panels. • Grid-and-infill composition inspired by the neighbouring Power building.

m) tall development to the adjacent listed heritage resources.	
With regards to the Heritage Impact Assessment/Built Heritage Impact Study guidelines/Terms of Reference: 5. Options for Mitigation and Alternatives i. Consider and describe alternative conservation/mitigation and development options that reduce and avoid negative impacts to the heritage resource ii. Assess and clarify the benefits and negatives of each option proposed and conservation principles used iii. Demonstrate effort to mitigate impact, maximizing integrity and compatibility with heritage resources impacted by provision of description of work and analysis of visual impact of proposal with heritage resources The Study submitted includes Section 8.0 Alternative Development Options and Mitigation Measures which notes that the exploration of alternative development options is not warranted due to no identified major adverse impacts. No suggestions, recommendations, or options of alternative measures or designs are provided. **However, please incorporate options that consider how the proposed development could maximize integrity and compatibility with nearby heritage resources to better fit into the Walkerville Heritage Area and better harmonize with the surrounding heritage resources.** A common guideline in Heritage Impact Assessments is to provide at least three options ranging from a "do-nothing" approach through to a complete redevelopment of the subject property.	As no major adverse impacts were identified, alternative development options were not explored in previous HIA dated June 26, 2025. However, an exploration of alternative development options is provided in **Section 8.0 of the updated HIA** (attached). This HIA has concluded that there are no impacts to cultural heritage resources within the Walkerville Heritage Area that result from the proposed development. In addition, the Urban Design Study concludes that the proposed building complies with the City's urban design policies and guidelines. Therefore, in our opinion, the proposed development appropriately fits within the Walkerville Heritage Area and consideration of other options or alternatives is not necessary in regard to cultural heritage matters.

Elevation drawings with height comparisons to the surrounding buildings are provided in **Section 4.2 of the Urban Design Study** and the updated Heritage Impact Assessment is provided in addition to this comment response matrix.

Yours truly,

MHBC



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cc. Dan Currie, MA, MCIP, RPP, CAHP, Partner