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## **Norval Quarry Rezoning Application (Brampton Brick) Peer Review of the Cultural Heritage Study and Cultural Heritage Impact Assessment Report prepared by Archaeological Services Inc.**

### **PURPOSE**

The purpose of the Cultural Heritage Study is clearly stated in the initial assessment in 2008 for the rezoning application and revised in 2010 Heritage Impact Assessment. The 2010 study followed the development of the quarry extraction location plan showing the delineated pile boundary, associated on-site haul route and a landscaping programme to mitigate views of the quarry consistent with the cultural heritage landscape context including built heritage resources of the area and the associated tributary of the Credit River.

The stated purpose of these reports is to accompany the 2008 rezoning application.

Comment: Generally the purpose of the study is well articulated based on the intent and documentation available at the time of the reports. The opinions expressed in this peer review (including appendices) may be supplemented, reconsidered or otherwise revised by the author(s) due to new or previously unknown information.

### **METHODOLOGY**

The 2008 Cultural Heritage Study was prepared in the form of a Cultural Heritage Assessment Report to evaluate the significance of the resources located on-site and immediately adjacent the property boundary. It also provided conclusions and recommendations on the design of the on-site haul route.

In 2010 a Heritage Impact Assessment for 10315 Winston Churchill Boulevard, City of Brampton was completed. An evaluation of the cultural heritage resources was completed resulting in the evaluation of the impacts and the preparation of 'mitigation' measures.

#### Comment

2008 Report – the report is well prepared. However, no detailed discussion was made of the off-site haul route(s). There is no inclusion of the 120m or 300m study area

zones in the review of the site the report. This is considered a deficiency in measuring off site impacts.

2010- The HIA report is clear in describing the intent based on available site background documentation.

In 2008, the off-site haul route was not discussed and did not form part of this assessment. The off-site 120m zone was not examined in a comprehensive manner in this study. It did not form part of the evaluation of significance. Off-site cultural heritage resources were not assessed.

In the 2010 report, there was no inclusion of the 120m or 300m study area zones for review although other disciplines were using the zones. The HIA is focused specifically on No. 10315 and No. 10333 Winston Churchill Boulevard. There are adjacent properties that should be considered for review in the larger impact study zones and haul route(s).

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## **INFORMATION**

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Under this category the research content related to assessing and evaluating resources on-site was deemed to be well prepared and clear. What is lacking in both the 2008 and 2010 study is information related to the off-site 120m and 300m study impact zones.

### Comment

The 2010 report does not provide linkages to the Visual study undertaken by Todhunter Associates and the Haul Route/Transportation study. Little or no reference was made to these studies or issues that are related in terms of the Heritage Impact Assessment document.

There is no comparative analysis made of other cultural heritage landscapes in the area related to the integrity, value and historical significance of the property in this study. The value ascribed to the site appears too limited and site specific. A larger study area scope would form the basis to measure impacts in the northwest area of Brampton and the adjacent municipality of Halton Hills. This would permit mitigation measures to be developed that are not related solely to the on-site study area.

The completeness of mitigation actions are too restricted and limited to the site only. The 2008 study was limited in terms of knowledge of the proposed final design with only minimal landscape buffering identified for implementation. In the 2010 HIA report, mitigation actions are limited to the two residences and the site. More information is required for the off-site impacts to adjacent cultural heritage resources in order to identify appropriate mitigation actions.

In terms of information gaps, the following is noted:

2008 CHAR- this study was limited in terms of knowledge of the proposed final design.  
2010 HIA - the recommended mitigation actions are limited to the two residences and the site. More assessment is needed for off-site resources to successfully measure impacts to the wider geographic area and community. No contact with the City of Brampton Heritage Co-ordinator or Heritage Brampton is documented in the consultation for this site.

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### **MITIGATION/MONITORING**

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The mitigation offered is related to on-site impacts. The 2010 HIA concludes changes will “occur through the introduction of physical, audible and atmospheric elements that are not in keeping with the setting or context” of the site and immediate study area.

#### Comment

Mitigation does not cover cultural heritage resources within the 120m or 300m impact assessment zones. No mitigation actions are offered for cultural heritage resources located within or adjacent to the haul route.

The study area is too limited in scope therefore it limits comparative analysis in regard to the heritage value of the cultural heritage resource’s significance. If the values of the on-site cultural heritage resources are determined to be of greater cultural heritage value in an expanded study area further recommendations will be required.

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### **ADEQUACY**

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Generally, the 2008 and 2010 HIA are considered to be well prepared and meet the standard assessment and evaluation measures for a CHAR and HIA.

#### Comment

The report did not provide comparative analysis of the project site or an examination of the 120m and 300m off-site study areas. This omission has resulted in an information gap in the assessment and evaluation.

The lack of direct consultation with Brampton Heritage has resulted in a reduced knowledge of local cultural heritage sensitivities.

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### **INTERDISCIPLINARY DISCUSSION WITH VISUAL PEER REVIEW EXPERT**

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Visual impacts to the site from the north-looking south were not addressed in the CHER or HIA. The area north of the site is at a higher elevation. There is a visual impact associated with the farm complex located off Heritage Road that backs onto the site. It is not mentioned in either the CHER or HIA. No measure of cultural heritage significance or value for surrounding properties is discussed in the 2008 CHER or 2010 HIA.

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**CONCLUSION**

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The two technical reports in support of the application supplied by Brampton Brick for the Norval Quarry site do not include sufficient off-site study area information to conclude that an acceptable level of assessment was completed. The 2010 Heritage Impact Assessment followed the City of Brampton guidelines for HIA studies to the extent of measuring impacts to two immediately adjacent properties. The content of the work was acceptable for the two properties. However, the HIA did not assess the off-site haul route impacts or visual and contextual change impacts within the 120m study area zone. This is not acceptable for this level of assessment. Consequently, the mitigation actions recommended are not acceptable as they fail to address the 120m study zone and the off-site haul route.

**SOURCES CONSULTED:**

City of Brampton. Guidelines for Preparing Heritage Impact Assessment, Draft July 2008.

Ontario Regulation 9/06 made under the *Ontario Heritage Act*, Criteria for Determining Cultural Heritage Value or Interest, January 25, 2006.

Ontario Ministry of Culture. *Heritage Resources in the Land Use Planning Process*. Queen's Printer for Ontario, Toronto, 2006.

Ontario Ministry of Municipal Affairs and Housing, Provincial Policy Statement 2005, Queen's Printer for Ontario, Toronto, 2005.

### Norval Quarry Rezoning Application (Brampton Brick)

#### **Preliminary Review Table – Cultural heritage**

This table is to provide a summary of the peer review work and must be submitted with the draft peer review report. It is not meant to be fully comprehensive, but to provide a starting point to organize thoughts and lead to final conclusions on the peer review assignment.

<b>Guideline Question</b>	<b>Findings regarding the Brampton Brick Report * two reports 2008 CHAR and 2010 HIA</b>	<b>Implications if this concern/issue is not addressed in the technical report</b>
<b>Purpose</b>		
Is the purpose of the work clearly and understandably stated in the applicant's report?	2008—generally purpose is well articulated for the period of the report. No discussion of off-site haul route. No inclusion of the 120m or 300m study area zones. 2010- HIA report is clear.	2008-off site haul route not known in 2008. Off-site 120m zone not examined thoroughly. 2010- No inclusion of the 120m or 300m study area zones. Focus of HIA only on #10315 and #10333.
Does the purpose set out the proper direction to undertake the study?	2008-yes 2010-yes, within the City of Brampton HIA guidelines	2010- impact limited to site area and immediately adjacent properties
<b>Methodology</b>		
Is the methodological approach technically sound? Is the review of issues, data, facts objective and appropriate?	2008-historical data is good. Objective good. 2010- follows HIA guideline	2008- 2010-impacts to narrowly defined to 2 properties; should include #10444.
Does the peer review identify any technical concerns stemming from the methodology (and assumptions made to inform the methodology) that may compromise the analysis and/or conclusions of the report?	2008- study does not address potential visual impacts from Heritage Road 2010 as above	2010 -More study needed.

<b>Guideline Question</b>	<b>Findings regarding the Brampton Brick Report * two reports 2008 CHAR and 2010 HIA</b>	<b>Implications if this concern/issue is not addressed in the technical report</b>
<b>Information</b>		
Are relevant data and facts clearly and consistently presented in the technical report?	2008- facts clearly presented 2010- facts clearly presented	2008- more info req'd 2010- more info req'd
Is information gathered from appropriate sources? Is the information useful? Accurate? Are there concerns regarding their quality or validity?	2008- yes, generally 2010- yes, generally	2008 and 2010 municipal contact limited with Brampton Heritage
Is the data used critical to the conclusions?	2008- generally yes 2010- generally yes	2008- study area not broad enough 2010- study area not broad enough
Is the Brampton Brick report thorough/comprehensive/complete? To respond to this question, peer reviewers must consider accuracy, appropriateness and timing/seasonality of the data collection (if applicable). Where specific technical report warrants, there may be a need to consider broader connections (i.e.: water inter-relationships). Please indicate if you feel this is lacking in the Brampton Brick report and what broader connections should be considered.	2008 2010- more linkage should be made to the Visual study and the Haul Route/Transportation study.	2010- no comparative analysis was made of other cultural heritage landscapes in the area to compare integrity, value and historical significance
How comprehensive and complete are the recommended mitigation and monitoring measures proposed by Brampton Brick? This includes assessing direct and indirect impacts; short and long term aspects.	2008- this study was limited in terms of knowledge of the proposed final design. Minimal landscape buffering requested 2010- the mitigation is too limited to the two residences and the site. More info needed for off-site resources	2008/2010- requires more detailed mitigation based off site impacts in 120m zone.

<b>Guideline Question</b>	<b>Findings regarding the Brampton Brick Report * two reports 2008 CHAR and 2010 HIA</b>	<b>Implications if this concern/issue is not addressed in the technical report</b>
The gap analysis will assess the relative importance of the data gaps and limitations to the project and identify potential options for addressing them. As such, a recommendation from a peer reviewer could be that additional survey and baseline monitoring must be undertaken as the project proceeds, provided the necessary frameworks are in place to direct this data collection and any changes that are triggered.	2008/2010- as stated above more off-site data should be collected.	2008/2010- requires more detailed mitigation based off site impacts in 120m zone.
<b>Certainty</b>		
Are certainties and uncertainties of the proposal’s success openly and objectively stated in the applicant’s report/study?	Yes as limited to the site and two adjacent properties	2008/2010- new certainties and uncertainties may relate to 120m zone.
Are all assumptions clearly stated? Are the assumptions reasonable? Analysis of assumptions and parameters.	Yes, based on prescribed study area	2008/2010- new assumptions may relate to 120m zone.
Are the standards or thresholds commonly accepted in this type of technical area identified and appropriately utilized? (i.e.: transportation, soils, natural environment? Etc...)	Yes, but limited to study area.	Value of cultural heritage resources on-site may be of greater heritage value.
<b>Issue Gaps</b>		
Are there issue gaps arising from the review?	2008/2010- lacks comparative assessment in larger geographic/municipal context	Value of cultural heritage resources on-site may be of greater heritage value.
Were the identified issues addressed in the technical report?	Generally yes.	
Are there key issues, related to the specific technical report, that have not been considered?	Comparative analysis of cultural heritage landscape not discussed. Better mapping would be useful of the larger study area.	Value of cultural heritage resources on-site may be of greater heritage value.

<b>Guideline Question</b>	<b>Findings regarding the Brampton Brick Report * two reports 2008 CHAR and 2010 HIA</b>	<b>Implications if this concern/issue is not addressed in the technical report</b>
<b>Mitigation/Monitoring</b>		
Are realistic mitigation measures/ rehabilitation plans proposed in the applicant’s report? Is there sufficient detail?	2010- calls for general landscape buffering but does not reference other plan studies. No photo documentation of the site requested.	2010- record of change for archival use not available to wider public review.
Do the proposed measures mitigate the impacts? Is the end result desirable from a technical point of view?	Generally yes. Could be more specific through reference to cultural heritage and included in the design plan.	
Will the proposed measures be adequate to address outstanding concerns?	Generally yes. More documentation required.	
<b>Conclusion</b>		
Do the conclusions satisfy the applicable policies of the relevant policy documents that need to be consulted as per the specific discipline (i.e.: Official Plan, Provincial legislation, standards and guidelines, etc...)? This should be informed by the policy matrix.  Have implications relating to required jurisdiction and agency approvals including environmental assessments been identified?	The consultants have applied regulations and guidelines that are applicable. They generally satisfy the policies. Further research to be completed to see if the Standard and Guidelines for Historic properties is applicable.	May require greater examination of value of the study area CHL beyond the that of the 2008 study.
Are the conclusions relevant to the purpose/objectives and supported by the work undertaken by the report authors?	Generally yes.	Assessment not fully complete.
Based on the peer review, would the same conclusions be determined?	Value of cultural heritage resources on-site may be of greater heritage value and more mitigation would be required.	More info would not change conclusion substantially but greater knowledge of comparative evaluation would confirm findings.



Guideline Question	Findings regarding the Brampton Brick Report * two reports 2008 CHAR and 2010 HIA	Implications if this concern/issue is not addressed in the technical report
<b>Adequacy</b>		
Does the applicant’s report/study adequately address the stated purpose?	Yes, with some info gaps.	More info would not change conclusion substantially but greater knowledge of comparative evaluation would confirm if findings are adequate.
Is there anything that should, in your opinion, have been done differently?	Comparative analysis of the project site and an examination of the 120m off-site study area. Consultation directly with Brampton Heritage	

**Conclusions**

The two technical reports in support of the application supplied by Brampton Brick for the Norval Quarry site do not include sufficient off-site study area information to conclude that an acceptable level of assessment was completed. The 2010 Heritage Impact Assessment followed the City of Brampton guidelines for HIA studies to the extent of measuring impacts to two immediately adjacent properties. The content of the work was acceptable for the two properties. However, the HIA did not assess the off-site haul route impacts or visual and contextual change impacts within the 120m study area zone. This is not acceptable for this level of assessment. Consequently, the mitigation actions recommended are not acceptable as they fail to address the 120m study zone and the off-site haul route.

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