



Planning Justification Report

Zoning By-law Amendment

25 and 43 Castlereagh Street, Town of Niagara-on-the-Lake

For: Niagara Historical Society

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1.0 Introduction

NPG Planning Solutions Inc. (“NPG”) are planning consultants to Niagara Historical Society, the “Owner” of two parcels municipally known as 25 Castlereagh Street and 43 Castlereagh Street (“Subject Lands”) in the Town of Niagara-on-the-Lake. These two properties (now merged on title) form the Subject Lands. The Subject Lands have an area of approximately 2,751 m² and are legally described as Part of Block 39, Registered Plan TP-86, in the Town of Niagara-on-the-Lake, Regional Municipality of Niagara. NPG has been retained to provide professional planning advice on the Application for a Zoning By-law Amendment to implement an integrated and expanded museum facility on the Subject Lands and to address zoning requirements to implement the integrated and expanded museum facility. It is important to note that there are previous approvals to expand the existing museum on the lands known as 43 Castlereagh Street. These previous approvals include an approved site plan and a heritage permit from the Town. With the acquisition of 25 Castlereagh Street, the integrated and expanded museum facility will include both properties. The proposed Zoning By-law Amendment is to provide one site-specific Zoning By-law for 25 Castlereagh Street and 43 Castlereagh Street.

This Planning Justification Report (“PJR” or “Report”) evaluates the appropriateness of the Application for the Zoning By-Law Amendment when assessed against the requirements of the *Planning Act*, the policies in the Provincial Planning Statement 2024 (“PPS”), Niagara Official Plan (“NOP”), the current Town of Niagara-on-the-Lake Official Plan (“Town’s OP”), the proposed Town of Niagara-on-the-Lake Official Plan 2025 (“Town’s Draft OP”), and the regulations of the Town of Niagara-on-the-Lake Zoning By-law No. 4316-09 (“Town’s Zoning By-law”). The proposed development is appropriate for the Subject Lands, compatible with the adjoining neighbouring uses, and represents good land use planning and therefore it is recommended that the Application for a Zoning By-law Amendment be approved.

Sections 5.1, 5.2, and 5.3 of this report present analysis of the proposed Application within the Provincial and Regional planning policies. Section 5.4 and 5.5 of this report discusses the proposal’s conformity with the Town’s current and proposed OP, while Section 6.0 provides justification for approval of the Application for a Zoning By-Law Amendment.

2.0 Description of Subject Lands and Surrounding Area

2.1 Overview of Subject Lands

The Subject Lands are located at the northwest corner of the intersection of Davy Street and Castlereagh Street, within Old Town in Niagara-on-the-Lake. The Subject Lands have a combined frontage of 81.99 metres on Castlereagh Street and 22.16 metres on Davy Street, with a total area of approximately 2,751 m². The properties are generally flat with some landscaping along the front on 25 and 43 Castlereagh Street.

Both properties have merged on title, according to the Museum’s lawyer who confirmed this information. Additionally, a small piece of the property, specifically PIN #46405-0117, is under the ownership of the Town, and the Town has reserved rights over the right-of-

way easement (Instrument No. RO691959). Please refer to the Topographical Sketch, prepared by J.D.Barnes Limited, dated September 5, 2025, for the PIN and Instrument Numbers, included as part of this submission.



Figure 1 – Aerial View of the Subject Lands

Although both properties have merged on title, this Report continues to reference the former addresses of 43 Castlereagh Street and 25 Castlereagh Street, based on the context of the discussion, where needed. Detailed descriptions of both 43 Castlereagh Street and 25 Castlereagh Street are included below.

43 Castlereagh Street

The portion of the Subject Lands, municipally addressed as 43 Castlereagh Street, is the Niagara-on-the-Lake Museum. This portion of the Subject Lands has a frontage of 60.65 metres along Castlereagh Street and measures 1695.10 square metres in area. The existing museum building is a long rectangular brick building, joined through a wooden connecting building referred to as the Link Building, between the High School and Memorial Hall buildings. The buildings are oriented along Castlereagh Street, with the eastern portion measuring one-storey in height and the western portion measuring two-storeys in height. Main access to the museum building is from the entryway located along Castlereagh Street (see **Photo 1**). The lands to the rear are largely vacant consisting of existing shrubs and trees, and a board fence separating the property from the adjacent properties to the north.

43 Castlereagh Street is designated as Established Residential in the Town’s OP and has a site-specific zoning: Institutional-54, in Section 7.14.54 of the Town’s Zoning By-law. Section 7.10 Institutional Zone of the Town’s Zoning By-law permits a full range of

institutional uses, which includes a museum. The site-specific zoning for the museum permits a range of site-specific zone requirements related to the standards of development. As per subclauses (g) and (h), parking and loading spaces are not required for 43 Castlereagh. Further, NPG has been informed that the Town has provided an on-street accessible parking space on Castlereagh Street near the museum. Lastly, the site-specific zoning designates Castlereagh as the front lot line/street line.

The property contains an existing museum building. It is designated under section 29 Part IV of the *Ontario Heritage Act* for its Cultural Heritage Value or Interest (CHVI) (Town of Niagara-on-the-Lake *Ontario Heritage Act* designation by-law No. 1463-84).¹ The property is not located within the Queen-Picton Heritage Conservation District (HCD) boundary, per Schedule A of By-law No. 4362-10.² However, the property is located within an area proposed to be included within an expanded Queen-Picton HCD. The work on this proposed expansion is ongoing and is still subject to Council approval and/or any OLT appeals. Within the Study for the proposed HCD expansion, the museum building has been identified as contributing to the heritage character of the proposed expanded HCD.³ This area is currently under an interim control by-law (The Corporation of the Town of Niagara-on-the-Lake By-law No. 2025-010⁴). This project is exempted from the provisions of this by-law.

A review of Designation By-law No. 1463-84 and the previously conducted Heritage Impact Assessment (Section 2.3 of the HIA), completed by ASI dated July 2021, includes the following information concerning the history of the existing buildings on 43 Castlereagh Street:

- **1875:** Construction of the building on the property, which served as the Town's first High School. It operated in that capacity until 1947. It is a single-storey rectangular brick building.
- **1906:** Ownership of the property, now containing the Memorial Hall, was transferred to the Niagara Historical Society, and subsequently construction of Memorial Hall, the two-storey rectangular brick building, was started. The building officially opened in 1907⁵.
- **1949:** Ownership of the building and property containing the High School was transferred to the Niagara Historical Society⁵.
- **1971 – 1973:** The Society undertook a renovation program that included the construction of a connecting structure, known as the Link Building, between Memorial Hall and the former High School.

¹ Town Register: <https://pub-notl.escribemeetings.com/filestream.ashx?DocumentId=22210>

Designation By-law: <https://www.heritagetrust.on.ca/oha/details/file?id=1486>

² By-law No. 4362-10: [By-law No. 4362-10.pdf](#)

³ Page 36 of Queen-Picton (Old Town) Heritage Conservation District Phase 1: Study Report: https://www.notl.com/sites/default/files/2025-07/NOTL-HCD-Study-Final-20260616_1.pdf

⁴ By-law No. 2025-010: <https://www.notl.com/media/5866>

⁵ Information confirmed with Museum Staff.

25 Castlereagh Street

This portion of the Subject Lands is located immediately west of 43 Castlereagh Street and contains a two-storey vinyl clad dwelling structure (closer to the street), a one-storey vinyl clad addition (at the rear), a shed and a wooden ramp connecting the driveway and the one-storey addition at the rear. This portion of the Subject Lands has a frontage of 21.34 metres along Castlereagh Street and measures 1056.16 square metres in area. The building is located closer to the street, rendering lands to the rear vacant, except for an accessory structure, a few existing trees, and a combination of cedar plantings and board fence separating the property from the adjacent properties to the north and west.

The Subject Lands are designated and zoned as Established Residential in the Town's OP and Zoning By-law 4316-09. A minor variance application, A-01/25, was approved by the Committee of Adjustment on February 20, 2025, to allow the existing building to function as an office space for the museum.

Like 43 Castlereagh Street, this property is outside the current Queen-Picton HCD boundary², but is located within the proposed expanded HCD boundary. Within the Study for the proposed HCD expansion, the dwelling on the property has been identified as contributing to the heritage character of the proposed expanded HCD.⁶ This area is currently under an interim control by-law (The Corporation of the Town of Niagara-on-the-Lake By-law No. 2025-010). This property is not currently designated under the *Ontario Heritage Act*.

2.2 Description of Surrounding Area

Immediately surrounding the Subject Lands are residential uses to its north, south, east and west. The surrounding residential neighbourhood consists primarily of one- to two-storey single-detached dwellings, contributing to the established residential character of the area.

In reviewing the larger context, the Subject Lands, located in Old Town, are within 500 metres of the downtown core located along Queen Street to the north, which is the largest commercial area in Old Town. Commercial uses along Queen Street consist of tourism commercial uses, retail stores, restaurants, hotels and various overnight accommodations. There are various institutional uses and parks and open space areas within a 500-metre radius of the Subject Lands, consisting of the Tourism Centre, Royal George Theatre, the Shaw Festival, Simcoe Park, Veterans Memorial Park and the Voices of Freedom Park. There are existing parking facilities within the vicinity of the Subject Lands, including the municipal parking lot on Platoff Street as well as a municipal parking lot further west of the Subject Lands on Market Street. On-street parking is located along streets such as King Street, Davy Street and Wellington Street.

The Subject Lands are accessed from Castlereagh Street, a Local Road (per Schedule J of the Town's OP) that is part of a grid street pattern in Old Town and within a connected

⁶ Page 36 of Queen-Picton (Old Town) Heritage Conservation District Phase 1: Study Report: https://www.notl.com/sites/default/files/2025-07/NOTL-HCD-Study-Final-20260616_1.pdf

sidewalk network, which provides convenient pedestrian access. There are no public transit services in proximity to the Subject Lands. Transit service is provided through Niagara Region Microtransit, a shared-ride service where residents can request trips through a mobile app or over the phone by selecting a pickup point and destination throughout the region.
















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|---|--|---|---|
|  Subject Lands |  Post Office |  Bike Route |  Queen-Picton Heritage Conservation District |
|  Parks/Recreation |  Hotels |  Institutional |  Tourism Centre |
|  Schools |  Grocery stores |  Commercial |  The Shaw Festival Theatre |
|  Municipal Parking Lot | | | |

Figure 2 – Site Context and Surrounding Uses

2.3 Planning History

This section includes a summary of previous *Planning Act* and *Ontario Heritage Act* applications and approvals, as these variances, site-specific zoning provisions, and heritage permits help support the proposed approach for building additions.

Table 1 – Previous Planning Applications

APPLICATION TYPE	DATE	APPLICATION SUMMARY
Minor Variance (A-47-96) – 43 Castlereagh Street	January 2, 1997	Construction of a small dormer addition to the existing roof to contain a stairwell to provide a second exit from the second floor of Memorial Hall. Variance is related to: <ul style="list-style-type: none"> • A reduced interior side yard setback for the existing building to 1.83 m
Zoning By-law Amendment (500VK-10) – 43 Castlereagh	April 26, 2010	43 Castlereagh Street was rezoned to a site-specific Institutional-54 Zone, consisting of the following provisions in addition to the Old Town Community Zoning - Institutional (I) Zone: <ul style="list-style-type: none"> • Property frontage is identified along Castlereagh Street • Reduced front yard setback to 3.3 m • Reduced interior side yard setback to 3 m & 1.8 m • Reduced exterior side yard setback of 6.61 m • Reduced rear yard setback of 5 m, and for the existing building at 0 m • Increased lot coverage of 39% • No required parking and loading spaces • A 3 m wide buffer strip adjacent to a residential zone is not required.
Heritage Permit (HER-48-2021) – 43 Castlereagh	November 2021	Alterations and additions related to the reconfiguration and adaptive reuse of the Niagara-on-the-Lake Museum (43 Castlereagh Street). The permissions relevant to this Application are related to a two-storey addition located north of Memorial Hall, along with a proposed deck and shed situated further to the north.
Minor Variance (A-01/25) – 25 Castlereagh	February 20, 2025	Implement relocation of the office space to the single-detached dwelling at 25 Castlereagh Street in coordination with the

APPLICATION TYPE	DATE	APPLICATION SUMMARY
		adjacent Niagara-on-the-Lake Museum (43 Castlereagh Street). Variances are related to: <ul style="list-style-type: none"> • Permission for museum-related office use, • Allow 2 parking spaces (one tandem) and no accessible parking space, • Reduced rear and side yard setbacks for an existing shed to 1.52 metres.

2.4 Site Photos

The following photos were taken during a site visit on October 23, 2025, and help further contextualize the Subject Lands.

Photo 1 – View of the Museum Building from Castlereagh Street



Photo 2 – View of the Outdoor Seating Area along Castlereagh Street



Photo 3 – Interface between 25 Castlereagh Street (left) and 43 Castlereagh Street (right)



Photo 4 – Existing Condition of the Rear Yard of 43 Castlereagh Street



Photo 5 – Existing Condition of the Rear Yard of 43 Castlereagh Street



Photo 6 – Existing Condition of the Rear Yard of 25 Castlereagh Street



Photo 7 – Existing Condition of the Rear Yard of 25 Castlereagh Street



Photo 8 – Interface between 25 Castlereagh Street (right) and residence at 15 Castlereagh Street (left)



Photo 9 – Existing Condition of the Streetscape along Castlereagh Street



Photo 10 – Existing Condition of the Intersection of Castlereagh Street and Davy Street



Photo 11 – Extension of the Museum Building (left) onto 287 Davy Street (right), subject to PIN #46405-0117 and Easement Instrument No. R0691959.



3.0 Proposed Development

Niagara Historical Society is proposing an Application for a Zoning By-law Amendment (ZBA) to implement an integrated and expanded museum facility and to address identified zoning requirements. The proposed development establishes the museum’s long-term vision for an integrated facility through building additions that support the museum’s future programming and operational needs. This Zoning By-law Amendment application applies to both 25 and 43 Castlereagh Street and would have one site-specific zone applying to both properties.

It is important to note that the Town of Niagara-on-the-Lake is situated on an angle, which results in a slight tilt from true north. For ease of reference, the Lynch + Comisso’s Site Plan, dated December 12, 2025, uses a simplified north orientation. This convention has been adopted in descriptions to maintain clarity and consistency throughout the Report. The proposal is to introduce a two-storey addition at the rear (north) of the existing two-storey Memorial Hall⁷. The building addition extends westward as a one-storey addition, connecting to the rear of 25 Castlereagh Street. For clarity, the term “Link Building” refers specifically to the existing structure that connects the High School building and Memorial Hall, as identified in designation By-law No. 1463-84. To maintain consistency, the word “link” is used exclusively in reference to this building. When describing the proposed one- and two-storey additions, the terms “proposed building addition”, “proposed expansion”, “proposal” or “proposed development” are used. Similarly, the phrase “proposed connection” is only used to describe the one-storey addition that will connect to 25 Castlereagh Street. This clarification is important as the two-storey addition received *Ontario Heritage Act* approval in 2021 from the Town. An HIA was included as part of the 2021 application (and summarized in Section 3.2.1 of this Report). The heritage-related impacts and mitigation measures discussed in this Report focus specifically on the proposed one-storey connection between 25 and 43 Castlereagh Street.

Ground Floor Level

As part of the programming for the integrated and expanded museum facility, the plan is to utilize the ground floor of the existing museum building, as exhibit spaces, retail and point-of-sale areas, and storage areas. This floor consists of washrooms, a separate accessible washroom and a lounge area for volunteers. A connection to the proposed building addition, more specifically, the two-storey addition, is provided from the northern wall of Memorial Hall at the ground floor level. It consists of a servery, storage and a multi-purpose room, measuring approximately 120 square metres. An elevator shaft and staircase are also provided for access between the basement, ground and second floor levels.

Access to the integrated museum facility is envisioned from between the existing museum building and the existing building on 25 Castlereagh Street, via a long and wide access ramp that connects to the proposed one-storey connection. Adequate landscaping will be incorporated to enhance the entrance leading up to the main entrance, as demonstrated

⁷ The two-storey addition was part of the 2021 Heritage Permit granted by the Town.

on the Site Plan Planting (see SK-002 of the Architectural Drawing Package). The main entrance is situated in the proposed one-storey connection, which will consist of a lobby, reception and cloak room and storage spaces. The proposed connection utilizes an internal access with the existing building on 25 Castlereagh Street.

The administrative functions are located within the existing building at 25 Castlereagh Street. The ground floor features a research room, a conference room, accessible washroom and a lunchroom for the exclusive use of staff members. This portion of the building has an independent walkway connection from the municipal sidewalk and a barrier-free access ramp. It is important to note that the existing building is being utilized without changing the external layout or structure of the building, as illustrated on Lynch + Comisso's elevation drawings (see SK-301, south elevation, of the Architectural Drawing Package).

The ground floor plan of the proposed building addition opens into a common landscaped and paved area at the rear of the Subject Lands. A small pathway leads to the back of the proposed addition where the mechanical equipment, contained within an enclosure, are located. Details of the enclosure will be discussed at the Site Plan Approval stage of the application. The pathway circulates around the mechanical equipment, connecting the fire escape located on the north and east elevations of the proposed building addition.

Second Floor Level

Currently, the second floor of the High School building primarily consists of storage areas, while Memorial Hall provides more exhibit space overlooking the ground floor space. There are no changes proposed to the Link Building at this level.

A connection to the proposed two-storey addition is provided from the northern wall of Memorial Hall at the second floor level. The second floor of the proposed two-storey addition hosts exhibit space, which overlooks the lobby area below, located within the proposed connection.

The second floor portion of the building on 25 Castlereagh Street will be dedicated to individual offices. This portion of the building is not connected to the proposed addition at this level.

Basement Level

The basement of the existing museum building is largely a crawl space and consists of utility spaces for maintenance purposes under the extent of the Link Building. A connection to the proposed two-storey addition is provided from the basement level, via the stairwell. This new bridge joining the Link Building and the proposed two-storey addition is located only at the basement level and appears as a 0.46-metre-high projection at ground level. Under the two-storey addition, the basement level includes a mechanical room, the elevator and stairwell shaft, and a storage room for museum holdings.

Under the proposed one-storey connection, the basement level includes visitor washrooms and storage rooms. An internal ramp is provided to access the storage rooms

under the proposed one-storey connection and the existing building on 25 Castlereagh Street.

Exterior Elevations and Streetscape Enhancements

No changes are proposed to the exterior façade of the existing museum building, visible from Castlereagh and Davy Street. Similarly, no changes are proposed to the existing exterior façade of the building on 25 Castlereagh Street, except the introduction of a barrier-free ramp to access this portion of the existing building.

The proposed westward extension, constituting the proposed one-storey connection, will be visible from Castlereagh Street in the space between the two existing buildings (25 Castlereagh and Memorial Hall). This space is currently used for driveway and parking purposes, as shown in **Photo 3**. The proposed connection is set back behind the existing buildings, and the mature trees and the existing buildings along Castlereagh Street will provide a natural visual barrier, ensuring the proposed connection is largely screened from the street except when viewed directly from the front. This approach will help conserve the existing streetscape character, while planned landscaping enhancements will further improve the overall appearance.

As noted, 43 Castlereagh Street, containing the existing museum building, is designated under section 29 Part IV of the *Ontario Heritage Act* for its CHVI. The intent of the proposed development is to conserve the existing museum building in its current built form, with all new additions located at the rear (north) of Memorial Hall and designed to connect to the adjacent building at 25 Castlereagh Street. An *Ontario Heritage Act* permit application will be submitted for the proposed works, as necessary, while recognizing the existing 2021 *Ontario Heritage Act* permit.

Phased Development

A phased development approach will be implemented to prioritize the building additions based on the museum's operational needs and available funding. As shown on the Phasing Plans (see SK-003 of the Architectural Drawing Package), the two-storey addition, at the rear of Memorial Hall will be completed first. Next, the one-storey extension with the main entrance will follow, and finally, the remaining one-storey extension consisting of storage rooms will be implemented.

Parking

The proposed development does not provide any on-site parking spaces. The proposed additions are intended to enhance operational efficiency within the museum facility, rather than increase visitor capacity. This is important in understanding the nature and scale of the development. While the Subject Lands are constrained in terms of available space, the only feasible location for additional on-site parking would be at the front of the museum building at 43 Castlereagh. However, introducing parking in this area would significantly disrupt the established streetscape character. The proposed development supports broader planning objectives of heritage conservation and neighbourhood compatibility. The proposal maintains the pedestrian-oriented nature of the neighbourhood and

minimizes potential impacts on adjacent residential uses. As such, museum visitor and staff parking is expected to be accommodated using on-street parking. This approach supports a context-sensitive parking strategy, recognizing the museum’s location where transit and active transportation options are available. Further details are provided in the Parking Letter prepared by UrbanTrans, dated December 12, 2025.

Zoning By-law Amendment

The Subject Lands are currently regulated by two different zoning categories - Established Residential (for 25 Castlereagh Street), and Institutional-54 (for 43 Castlereagh Street). The Application for a Zoning By-law Amendment proposes to rezone the Subject Lands from the current zoning categories to a site-specific Institutional (I-XX) Zone with site-specific exceptions from the General Provisions and Zone Requirements generally related to the following:

Zoning Relief Requests

- Provide relief related to maximum lot coverage, interior side yard setback, maximum building height, buffer strip, permitted yard projection and encroachment.
- Recognize existing conditions related to minimum front yard setback, exterior side yard setback.
- Address deficiencies related to loading and parking spaces, including accessible parking spaces.
- Carry forward existing site-specific provisions for 43 Castlereagh Street, as appropriate.

Future Requirements to Implement the Integrated Museum Facility

In addition to the Zoning By-law Amendment, the proposed development will require a heritage permit and will be subject to a future Application for Site Plan Approval (“SPA”).

3.1 Pre-Consultation Summary

A pre-consultation meeting with the Town was held on October 02, 2025, to discuss the proposed Zoning By-law Amendment Application and future Site Plan Approval Application, as required by Section 22.3 of the Town’s OP.

The following reports/plans are required at the Zoning By-law Amendment stage for a complete application:

- Planning Justification Report (PJR)
- Draft Zoning By-law Amendment (as part of the PJR)
- Parking Impact Analysis
- Archaeological Assessment and Ministry letter(s) (see below)
- Arborist Report/ Tree Inventory
- Functional Servicing Report & Stormwater Management Report

- Geotechnical Study (Not required for ZBA, see below)
- Updated Heritage Designation By-law (Not required for ZBA, see below)
- Site Plan
- Conceptual Landscape and Planting Plan
- Building Elevations
- Floor Plans
- Servicing Plan (Not required for ZBA, see below)
- Lot Grading and Drainage Area Plan (Not required for ZBA, see below)
- Property Index Map and Parcel Registers

The aforementioned studies have been included in this submission and are summarized in Section 4.

Although, the pre-consultation agreement requests a Stage 1 and Stage 2 Archaeological Assessment for the entire Subject Lands, detailed comments from staff (email from Sumra Zia, dated October 2, 2025) note that a portion of 43 Castlereagh Street has been cleared of having archaeological potential and would be scoped out of the assessment. NPG had further discussions with staff confirming only a Stage 1 Archaeological Assessment with the Ministry Letter will be required for the ZBA stage. Correspondence with staff is included in **Appendix 7** of this Report. Accordingly, a Stage 1 Archaeological Assessment for 25 Castlereagh Street (with the understanding that a Stage 2 Archaeological Assessment would be required at the Site Plan Approval stage) has been included with this application.

Similarly, the pre-consultation agreement also requests for a Servicing Plan, Lot Grading and Drainage Area Plan and an updated Geotechnical Study. However, these studies have been confirmed to be required only at the Site Plan Approval stage, and not at the ZBA stage. Correspondence with staff is included in **Appendix 7** of this Report.

Lastly, NPG has also confirmed with staff that an updated Heritage Designation By-law is not required for the ZBA stage. Correspondence with staff is included in **Appendix 7** of this Report.

3.2 Previously Completed Studies

3.2.1 Heritage Impact Assessment

A Heritage Impact Assessment (HIA) was prepared by ASI, dated July 2021, as part of previously approved Heritage Permit (HER-48-2021), approved in November 2021. The HIA evaluated the impacts of the proposed alterations related to the proposed two-storey addition located north of Memorial Hall on 43 Castlereagh Street.

The relevant sections have been reviewed and discussed below:

- Section 1.3 identified that the High School has cultural heritage value as the first high school in Niagara-on-the-Lake. Memorial Hall has cultural heritage value as the first purpose-built museum building in Ontario. Appendix A of the HIA provides

the "Statement of Significance" [SCHVI] and description of "character-defining elements" [heritage attributes] associated with this designation.

- Further, 43 Castlereagh Street is also located within the Niagara-on-the-Lake National Historic Site of Canada. This is a district that has cultural heritage value as a collection of classically designed buildings constructed following the War of 1812, reflecting the Town's history as a prominent Loyalist colonial town.
- Section 3.2 of the HIA discusses the existing conditions of the existing buildings at 43 Castlereagh Street, namely, the Memorial Hall, High School and the Link Building.
- The HIA provides an overview of the surrounding streetscape, which is predominantly residential, characterized by a mix of nineteenth-century homes and Victory-style houses from the Second World War period. The street has a mature tree canopy, and buildings have deep setbacks from the street.

As the two-storey building addition behind Memorial Hall was reviewed as part of ASI's HIA, and this report was accepted by the Town, it has not been reassessed for heritage-related impacts and mitigation measures in this Report.

Information from this HIA has been used to assist in the assessment of potential impacts of the proposed one-storey connection between the proposed two-storey addition and the existing building at 25 Castlereagh Street on the identified heritage attributes. This analysis is provided within **Appendix 8** to this Report.

Assessments related to the detailed design and materials of the proposed one-storey connection will be conducted through the *Ontario Heritage Act* permit approval process and Site Plan Approval.

4.0 Supporting Studies Review

4.1 Parking Impact Analysis

A Parking Letter has been prepared by UrbanTrans Engineering Solutions Inc. ("UrbanTrans") dated December 12, 2025, in support of the proposed Zoning By-law Amendment Application. The following points can be summarized from the letter:

- There are currently nine (9) on-street parking spaces on Castlereagh Street, which are designated by municipal signage for exclusive museum and visitor use between 10:00 a.m. and 5:00 p.m. daily.
- The Operations Department Staff have advised that these designated museum parking signs will be relocated to fully encompass both properties at 25 and 43 Castlereagh Street, resulting in a total of twelve (12) on-street parking spaces including one (1) Accessible Parking Space. Please refer to Appendix B of the Letter for the Proposed On-street Pavement Marketing Plan.
- The proposed museum expansion is required to provide a total of 13 spaces, as detailed in Table 1 of the Letter.

- No on-site parking spaces are proposed on the Site Plan dated December 12, 2025. Based on this, a shortfall of only one (1) parking space is anticipated. This parking deficiency can be supported based on the following:
 - A parking survey analysis was conducted to assess peak parking demand and on-street parking availability and summarized in Table 2 of the Letter. The analysis confirms that ample on-street parking capacity exists in the nearby streets, within an approximate 250-metre walking distance, including Veterans Lane, Castlereagh Street, Platoff Street, and Davy Street, to fully accommodate visitor demand.
 - It is common for historical sites and museums, particularly in Niagara-on-the-Lake, to rely primarily on on-street parking rather than dedicated off-street lots, as this approach preserves the historic streetscape, avoids large, paved areas that disrupt the architecture and view from the street, and aligns with municipal policies minimizing off-street parking requirements in conservation zones.

The letter confirms that any incremental parking demand generated by the proposed development can be accommodated within the existing on-street parking capacity in the immediate vicinity of the Niagara-on-the-Lake Museum.

4.2 Archaeological Assessment

4.2.1 Stage 1-2 Archaeological Assessment for northern portion of 43 Castlereagh Street

A Stage 1 and 2 Archaeological Assessment of the northern portion of 43 Castlereagh Street was prepared by ASI on September 29, 2015. Key findings of the portion of the property located at the rear of Memorial Hall, where the building addition is proposed, are summarised below:

- The Stage 1 background research indicated potential for the presence of pre-contact Aboriginal and historical Euro-Canadian archaeological resources.
- The Stage 2 assessment included a test pit survey at 5-metre intervals on all accessible portions of the survey area. The survey area was found to be thoroughly disturbed except for a narrow strip along the west boundary where an intact buried topsoil deposit was documented. No archaeological material was encountered during the survey.
- The report recommends no further work for this portion of 43 Castlereagh Street.

The Stage 1 and 2 report was entered into the Ontario Public Register of Archaeological Reports on December 9, 2015 (MTCS File Number 0003975).

4.2.2 Stage 1-2 Archaeological Assessment for 43 Castlereagh Street

A Stage 1 and 2 Archaeological Assessment of the property at 43 Castlereagh Street was prepared by ASI on October 13, 2020. Key findings of the assessment are summarised below:

- The Stage 1 background research indicated potential for encountering both historical Euro-Canadian and pre-contact Indigenous remains within the Subject Lands.
- Subsequently, the Stage 2 field assessment was conducted on August 26, 2020. No archaeological material was encountered during the field survey.
- The report recommends no further archaeological assessment of this portion of the Subject Lands.

The Stage 1 and 2 report was entered into the Ontario Public Register of Archaeological Reports on 19 November 2020 (MHSTCI File Number 0003975).

4.2.3 Stage 1 Archaeological Assessment for 25 Castlereagh Street

A Stage 1 Archaeological Assessment was completed by Archaeological Consultants Canada (“ACC’s Archaeological Assessment”) on December 9, 2025, for 25 Castlereagh Street. The Ontario Ministry of Citizenship and Multiculturalism (MCM) assigned Project Information Form (PIF) number P1208-0715-2025 to this project.

Based on the background research conducted, the remaining 0.10 hectares, constituting 25 Castlereagh Street, has general archaeological potential and requires a Stage 2 assessment, as per the recommendations of ACC’s Archaeological Assessment. Key findings of the assessment are summarised below:

- 0.03 ha has been previously intensively and extensively disturbed by major landscaping and construction activities involving grading below topsoil for construction of residential buildings and driveways.
- 0.07 ha of the subject property retains archaeological potential. the Stage 2 assessment of these areas should be completed by test pit survey at 5 m grid intervals.
- The Stage 2 assessment must confirm, document, and map all areas of low to no archaeological potential identified during this Stage 1 archaeological assessment.

This Stage 2 archaeological assessment is proposed to be undertaken in spring 2026.

Additionally, staff have requested an acceptance letter from MCM confirming ACC’s Stage 1 Archaeological Assessment. ACC and the Museum have requested an expedited review and acceptance letter from MCM to facilitate inclusion of the Stage 1 Archaeological Assessment in the Ontario Public Register of Archaeological Reports. This letter is forthcoming and will be provided during the review of the ZBA application.

4.3 Tree Inventory

Davey Resource Group prepared the Tree Inventory, dated December 19, 2025, for the proposed development.

There are a total of thirty-nine (39) trees identified in the Tree Inventory, located on the Subject Lands and on neighbouring properties close to the property line. Of the total surveyed trees, thirty-five (35) trees are to remain. The remaining four (4) trees are proposed for removal based on the following observations and recommendations:

1. Tree #19: Manitoba Maple has been recommended for removal to accommodate excavation.
2. Tree #30: Colorado Blue Spruce has been recommended for removal to accommodate known storm sewer alignments.
3. Tree #31: Colorado Blue Spruce has been recommended for removal to accommodate known storm sewer alignments.
4. Tree #34: Eastern Redbud has been recommended for removal to accommodate the construction of the building addition.

The tree removal and protection plan will be finalized at the Site Plan Approval stage, following confirmation of the detailed servicing design.

4.4 Functional Servicing Report

Hallex Engineering has prepared a Functional Servicing Design Brief (or “Hallex’s FSDB”), dated December 16, 2025, to determine the functional sizing of the proposed storm, sanitary and water services and determine the impact on the existing municipal infrastructure. Key findings of the Brief are summarised below:

Stormwater

- Stormwater drainage will be through the municipal storm sewer at Davy Street.
- Stormwater quantity controls will be achieved by an orifice plate installation. The post-development stormwater run-off is anticipated to generate 36m³ volume from the five-year storm event. A stormwater detention will be required for the proposed development.
- Storm water quality controls can be achieved through a Hydroguard HG4.

Sanitary

- All existing sanitary laterals are to be located, capped, and abandoned at the property line. A new sanitary lateral shall be proposed from the building to the existing municipal sanitary sewer at Castlereagh Street.
- A minimum 150mm sanitary sewer @ 1.0% is recommended to be installed to convey sanitary flows from the proposed and existing buildings to the existing municipal sanitary sewer at Castlereagh Street.

Water

- All existing water services are to be located, capped, and abandoned at the property line. A new water service shall be proposed from the building to the existing municipal watermain at Castlereagh Street.
- There are 2 existing municipal fire hydrants located near the Subject Lands.
- A minimum 150mm water service is recommended to be installed to provide water supply to the proposed development from the existing municipal watermain at Castlereagh Street. The water service is to be separated into a domestic water service and fire protection service at the property line.

5.0 Planning Policies

This Planning Justification Report provides an analysis of the proposed development and evaluates the appropriateness of advancing an Application for a Zoning By-law Amendment in the context of the *Planning Act*, Provincial Planning Statement (“PPS”), Niagara Official Plan (“NOP”), the Town of Niagara-on-the-Lake Official Plan July 2017 (“Town’s OP”), and Town of Niagara-on-the-Lake Draft Official Plan, November 2025 (“Town’s Draft OP”). The following provides an overview and thorough analysis of these documents in the context of the proposed development.

5.1 *Planning Act*

The *Planning Act*, R.S.O. 1990, Chapter P.13, provides provincial legislation that establishes the requirements for land use planning in Ontario. The Act describes how land uses may be controlled, and who may control them.

Section 2 of the *Planning Act* (“the Act”) outlines the matters of provincial interest that Council shall have regard for in carrying out their responsibilities under the Act. Included in these matters are:

- (a) the protection of ecological systems, including natural areas, features and functions;*
- (d) the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest*
- (h) the orderly development of safe and healthy communities*
 - (h.1) the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;*
- (i) the adequate provision and distribution of educational, health, social, cultural and recreational facilities;*
- (l) the protection of the financial and economic well-being of the Province and its municipalities*
- (p) the appropriate location of growth and development*
- (q) the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;*
- (r) the promotion of built form that:*
 - i. is well-designed*
 - ii. encourages a sense of place*
 - iii. provides for public spaces that are of high quality, safe, accessible, attractive and vibrant*

Matters of provincial interest are articulated in Provincial, Regional, and Town planning documents, and discussed in this Planning Justification Report. The Application provides for the conservation of existing trees, with the removal of four (4) trees as illustrated on Davey Resource Group's Tree Inventory, dated December 19, 2025. The majority of trees on the Subject Lands will be retained, and there are no natural heritage features on the Subject Lands. It also conserves cultural heritage and archaeological resources by retaining the existing museum building and adjacent dwelling structure, with expansions primarily to the rear (and north) of Memorial Hall and designed to connect to the adjacent building at 25 Castlereagh Street. The Stage 1&2 Archaeological Assessment for 43 Castlereagh Street, has been cleared of having archaeological potential, while the Stage 1 Archaeological Assessment for 25 Castlereagh Street identifies the property has having archaeological potential and requires a Stage 2 assessment, as per the recommendations of ACC's Archaeological Assessment. A Stage 2 archaeological assessment is proposed to be undertaken in spring 2026. The Application supports the Town's economic well-being and strengthening the tourism focus of the area in an appropriate location in the Town. The proposed additions to the museum building are located on lands that permit community facilities. The proposed additions allow for improving the operational and programming needs by building on the existing museum facility and making efficient use of the available land and buildings. Furthermore, the proposed additions will be well-designed to integrate with and complement the existing museum building, while ensuring compatibility with adjacent properties. By retaining the existing buildings and not providing any parking spaces on the Subject Lands, the proposal also conserves the established streetscape character along both Davy and Castlereagh Streets.

Subsection 3(5) of the *Planning Act* requires that decisions of Council shall be consistent with provincial policy statements and shall conform with provincial plans that are in effect.

Subsection 24(1) of the *Planning Act* requires that by-laws passed by Council shall conform to official plans that are in effect.

Section 34 of the *Planning Act* permits councils of local municipalities to pass and/or amend zoning by-laws for such purposes as may be set out in the By-law, and for regulating construction and land use within the municipality.

For these reasons, the Application has regard for matters of provincial interest as considered throughout this Report. Consistency with Provincial policies, and conformity with Regional and Town policies are discussed in-depth in the subsequent sections of this Report.

5.2 Provincial Planning Statement (2024)

The Provincial Planning Statement (2024), hereinafter referred to as PPS, sets the policy foundation for regulating land use in Ontario. The PPS requires that developments make efficient use of land and services and supports opportunities for long term economic prosperity.

The Subject Lands are located within a Settlement Area. The following policies apply.

5.2.1 Settlement Areas

Section 2.3 of the PPS provides the following policies regarding settlement areas:

POLICY

2.3 Settlement Areas and Settlement Area Boundary Expansions

2.3.1 General Policies for Settlement Areas

- 1. Settlement areas shall be the focus of growth and development.*
- 3. Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.*

ANALYSIS

The Subject Lands are located within the Delineated Built-Up Area and Urban Area Boundary of the Town of Niagara-on-the-Lake Official Plan, where growth and development are to be directed. The lands are designated Established Residential in the Town's OP, which permits the existing community facility (museum) use and allows the proposed additions to the museum building.

The Subject Lands are located one block away from the Queen-Picton commercial area, which is recognized as a focus for tourist-serving commercial activities. The proximity of the commercial district supports the museum by increasing visitor exposure and contributing to the local tourism economy. Lastly, the proposed development utilizes the lands efficiently by ensuring appropriate growth occurs in a location suitable for the expansion of the existing community serving use, while being compatible with the nearby residential properties and heritage resources.

5.2.2 Employment

Section 2.8 of the PPS provides the following policies regarding employment:

POLICY

2.8 Employment

2.8.1 Supporting a Modern Economy

1. *Planning authorities shall promote economic development and competitiveness by:*

- a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;*

ANALYSIS

The Application to permit expansion of the existing museum facility supports the Town's local economy and tourism by helping draw visitors to the area. The proposed expansion will facilitate opportunities for extending visitors stay, supporting surrounding commercial and tourism-oriented uses.

5.2.3 Infrastructure and Transportation

The following sections of the PPS provide policies regarding infrastructure, public service facilities, transportation and servicing.

POLICY

3.1 General Policies for Infrastructure and Public Service Facilities

1. *Infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs.*

3.2 Transportation Systems

2. *Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.*

3. *As part of a multimodal transportation system, connectivity within and among transportation systems and modes should be planned for, maintained and, where possible, improved, including connections which cross jurisdictional boundaries.*

3.6 Sewage, Water and Stormwater

2. *Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety.*

For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.

8. Planning for stormwater management shall:

- a) be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle;*
- b) minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads;*
- c) minimize erosion and changes in water balance including through the use of green infrastructure;*
- d) mitigate risks to human health, safety, property and the environment;*
- e) maximize the extent and function of vegetative and pervious surfaces;*
- f) promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and*
- g) align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale.*

3.9 Public Spaces, Recreation, Parks, Trails and Open Space

1. Healthy, active, and inclusive communities should be promoted by:

- b) planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources;*

ANALYSIS

The museum building is currently serviced by existing municipal infrastructure, which aligns with the preferred servicing approach for settlement areas. The proposed expansion will also rely on the existing municipal facilities for water, sewage and stormwater facilities as confirmed in Hallex’s FSDB, dated December 16, 2025.

Castlereagh Street is part of a grid street pattern, containing a connected sidewalk network. Sidewalks are present on both sides of the abutting streets, which provides

convenient pedestrian access. The Niagara Region Microtransit service is available for reaching anywhere within the region. The parking strategy proposed by the development also encourages the use of the existing public transportation system.

In response to Policy 3.6.8, Hallex's FSDB recommends stormwater quantity and quality controls to minimize stormwater volume and contaminant loads. Roughly 64% of the Subject Lands will be preserved as landscaped open space, providing pervious surfaces for stormwater infiltration and reduce the load on the existing municipal facilities.

5.2.4 Cultural Heritage and Archaeology

Section 4.6 of the PPS provides the following policies regarding cultural heritage and archaeology:

POLICY

4.6 Cultural Heritage and Archaeology

- 1. Protected heritage property, which may contain built heritage resources or cultural heritage landscapes, shall be conserved.*
- 2. Planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the significant archaeological resources have been conserved.*
- 3. Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property unless the heritage attributes of the protected heritage property will be conserved.*

ANALYSIS

As previously described, the portion of the Subject Lands formally known as 43 Castlereagh Street is designated under section 29 Part IV of the *Ontario Heritage Act* for its CHVI. The proposed addition is located at the rear (north) of Memorial Hall and extends westward as a one-storey addition, connecting to the rear of 25 Castlereagh Street. The proposed addition is carefully located to avoid disruption to the existing building street elevations. The placement of the building addition ensures that the Subject Land's identified heritage attributes, as outlined in **Appendix 8** of this Report, will be conserved.

Additionally, previously conducted Stage 1-2 archaeological assessments for 43 Castlereagh Street, documented no archaeological material during the field survey. The reports recommend no further archaeological assessment for this portion of the Subject Lands. The Stage 1 Archaeological Assessment for 25 Castlereagh Street identified the need to undertake additional archaeological work, as per the recommendations of ACC's Archaeological Assessment. An expedited review and acceptance letter from MCM to facilitate inclusion of the Stage 1 Archaeological Assessment in the Ontario Public

Register of Archaeological Reports has been requested. This letter is forthcoming and will be provided during the review of the ZBA application. A Stage 2 archaeological assessment is proposed to be undertaken in spring 2026.

Lastly, the proposed development is compatible with the surrounding residential character of the area based on the analysis undertaken in Section 5.4.3 of this Report.

SUMMARY

Based on the foregoing, the proposed Application is consistent with the PPS as it is in a settlement area, will contribute to the conservation of the cultural heritage resources in the Town. Areas identified for further archaeological assessment are proposed to be assessed in Spring 2026. Moreover, the proposal makes efficient use of the existing municipal infrastructure for transportation and servicing. Lastly, the Application supports the Town’s tourism and local economy by attracting visitors to this area of Old Town.

5.3 Niagara Official Plan (2022)

The Region of Niagara Official Plan (“NOP”) is Niagara’s long-term, strategic policy planning framework for managing growth in the region. It contains objectives, policies and mapping that implement the Region’s approach to provide for managing growth, growing the economy, protecting the natural environment, resources and agricultural land, and providing infrastructure.

On March 31, 2025, the Town of Niagara-on-the-Lake became responsible for the interpretation and implementation of the NOP as it applies to the Town. The policies of the NOP continue to apply and will be referenced as the NOP for clarity within this report. As outlined in **Table 1** and shown in **Appendix 2**, the Subject Lands are located within the Delineated Built-up Area and are within an Area of Archaeological Potential.

Table 1 – NOP Schedules and Designations of Subject Lands

SCHEDULE	SUBJECT LANDS DESIGNATION
<i>Schedule B – Regional Structure</i>	Old Town is a Delineated Built-Up Area
<i>Schedule K – Areas of Archaeological Potential</i>	Old Town is within Areas of Archaeological Potential
<i>Figure 3 – Archaeological Potential Planning Map (Niagara Region Archaeological Management Plan)</i>	Subject Lands are within Areas of Archaeological Potential

5.3.1 Managing Urban Growth

Section 2.2.1 of the NOP provides the following policies regarding managing urban growth:

POLICY

2.2.1 Managing Urban Growth

2.2.1.1 Development in urban areas will integrate land use planning and infrastructure planning to responsibly manage forecasted growth and to support:

b. a compact built form, a vibrant public realm, and a mix of land uses, including residential uses, employment uses, recreational uses, and public service facilities, to support the creation of complete communities;

d. social equity, public health and safety, and the overall quality of life for people of all ages, abilities, and incomes by expanding convenient access to:

i. a range of transportation options, including public transit and active transportation;

e. built forms, land use patterns, and street configurations that minimize land consumption, reduce costs of municipal water and wastewater systems/services, and optimize investments in infrastructure to support the financial well-being of the Region and Local Area Municipalities;

j. conservation or reuse of cultural heritage resources pursuant to Section 6.5;

k. orderly development in accordance with the availability and provision of infrastructure and public service facilities; and

ANALYSIS

In accordance with Policy 2.2.1.1 b), the additions to the museum building will continue to operate alongside the existing museum use. Proposed programming will provide educational and recreational opportunities, encouraging passive surveillance and gentle street-level activity along Castlereagh Street, which is primarily residential in character.

With regard to Policy 2.2.1.1 d) the Subject Lands proximity to the Queen-Picton commercial area, access to NRT Microtransit, and connection to a sidewalk that is part of a grid-pattern street network all support the use of active transportation.

In reference to Policy 2.2.1.1 e) and k), the proposed building additions are located on lands that permit a community facility use. The museum and existing house are

connected to the existing municipal water, wastewater, and servicing infrastructure, thus optimizing current municipal investments, reducing servicing costs and supporting the financial well-being of the Town and Region.

Lastly, as previously noted, the proposed development will ensure the conservation of cultural heritage resources on the Subject Lands.

5.3.2 Supporting Economic Prosperity

Section 4.5.2 of the NOP provides the following policies regarding supporting economic prosperity.

POLICY

4.5.2 Economic Prosperity through Land Use Planning

4.5.2.1 This section consolidates policy direction integrated throughout this Plan that supports economic prosperity.

The Region will endeavour to:

e. support opportunities for nature and culture-based tourism by:

iv. promoting excellence in urban design and requiring conservation of significant cultural heritage resources to foster a sense of place;

vi. promoting revitalization and redevelopment within downtown and community cores to enhance their existing character.

ANALYSIS

The proposed additions to the existing museum facility directly supports the Region's goal of encouraging economic prosperity through culture-based tourism, based on the following points:

- The proposal preserves the existing museum building, aligning with the intent to foster a sense of place.
- The proposal promotes revitalization with new programming opportunities that contribute to gentle street-level activity along Castlereagh Street.
- The proposal contributes to the conservation of the cultural heritage and archaeological resources in the Town, based on the Stage 1-2 archaeological assessments conducted for 43 Castlereagh Street and Stage 1 archaeological assessment for 25 Castlereagh Street.

5.3.3 Infrastructure

Section 5.2 of the NOP provides the following policies regarding infrastructure:

POLICY

5.2.1 Infrastructure Planning, Development, and Asset Management

5.2.1.18 *Planning for stormwater management shall:*

- a. conform with Section 3.2;*
- b. be integrated with planning for sewage and water services and ensure that systems are optimized, feasible and financially viable over the long term;*
- c. minimize, or, where possible, prevent increases in contaminant loads;*
- d. minimize erosion and changes in water balance, and prepare for the impacts of climate change through the effective management of stormwater, including the use of green infrastructure;*
- e. mitigate risks to human health, safety, property, and the environment;*
- f. maximize the extent and function of vegetative and pervious surfaces;*
- g. promote stormwater management best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and*
- h. consider green infrastructure and other measures which address the impacts of climate change.*

5.2.2 Municipal Water and Wastewater Servicing within Urban Areas

5.2.2.2 *Municipal water and wastewater systems/services are the required form of servicing for development in urban areas.*

5.2.2.4 *Prior to approval of development, the municipality shall ensure that required water and wastewater services and servicing capacity is available to support the development.*

5.2.5 Stormwater Management and the Planning Process

5.2.5.1 *All new development and redevelopment in settlement areas must be provided with separate storm drainage systems or separate storm drainage connections.*

ANALYSIS

In accordance with Policy 5.2.2.2 and 5.2.2.4, the existing museum, together with the proposed additions, will be connected to the existing municipal water and wastewater servicing infrastructure of the property, as confirmed by Hallex's FSDB, dated December 16, 2025.

In accordance with Policy 5.2.5.1, there exists a separate storm sewer along Davy Street. Hallex's FSDB confirms that the existing storm sewer will be utilized for stormwater drainage purposes. For Policy 5.2.1.18, Hallex's FSDB recommends implementing stormwater quantity and quality controls to minimize runoff volume and reduce contaminant loads entering the municipal facilities. Approximately 64% of the Subject Lands will remain as landscaped open space, providing pervious surfaces that promote natural infiltration and groundwater recharge. This design approach significantly reduces stormwater discharge to municipal facilities, alleviating pressure on existing infrastructure and supporting sustainable water management practices.

5.3.4 Archaeology & Cultural Heritage

Section 6.4 and 6.5 of the NOP provides the following policies regarding archaeology and cultural heritage, respectively:

POLICY

6.4.2 Conservation in Accordance with Provincial Requirements

6.4.2.1 Development and site alteration shall not be permitted on lands containing archaeological resources or areas of archaeological potential unless significant archaeological resources have been conserved or the land has been investigated and cleared or mitigated following clearance from the Province.

6.4.2.5 Unexcavated archaeological sites and archaeological resources shall be protected against disturbance until all required archaeological assessments and requirements from the Province have been completed.

6.4.2.6 Where a site proposed for development is located within an area of archaeological potential, the Local Area Municipality shall circulate the application and a Stage 1 Archaeological Assessment by a licensed archaeologist, as well as a Stage 2 Assessment, where required, to the Region as part of a complete application. This policy applies when any part of a development application falls within an area of archaeological potential as identified on Schedule K and will be addressed as early as possible in the planning process.

6.4.2.10 Local Area Municipalities are encouraged to support conservation of archaeological resources by:

b. requiring an archeological assessment if the lands are located within an area of archaeological potential as indicated in the Archaeological Management Plan, the municipality's archaeological potential mapping, or where an archaeological site has been previously registered on the property.

6.5.1 Cultural Heritage Resources

6.5.1.1 Significant cultural heritage resources shall be conserved in order to foster a sense of place and benefit communities, including First Nations and Métis communities.

6.5.1.2 The Region encourages Local Area Municipalities to designate properties of cultural heritage value or interest, either individually or as part of a larger area or Heritage Conservation District, under the Ontario Heritage Act.

6.5.1.5 Development and site alteration on protected heritage property or adjacent lands shall not be permitted, except where the proposed development and site alteration has been evaluated through a heritage impact assessment and it has been demonstrated that the heritage attributes of the protected heritage property will be conserved.

6.5.1.7 Local Area Municipalities are encouraged to consider the use of heritage impact assessment in conserving cultural heritage resources on a community planning basis.

ANALYSIS

Schedule K of the NOP identifies the Subject Lands as being within an area of archaeological potential. Two Stage 1-2 archaeological assessments were conducted for 43 Castlereagh Street, one in 2015 for the northern portion at the rear of Memorial Hall, where the building addition is proposed, and another in 2020 for the remainder of the property. Both assessments found no archaeological materials during the field surveys. As a result, the reports concluded that no further archaeological assessment is required for this portion of the Subject Lands. A Stage 1 Archaeological Assessment has been completed for 25 Castlereagh Street, indicating that a Stage 2 archaeology assessment is required for most of the property. An expedited review and acceptance letter from MCM to facilitate inclusion of the Stage 1 Archaeological Assessment in the Ontario Public Register of Archaeological Reports has been requested. This letter is forthcoming and will be provided during the review of the ZBA application.

Additionally, 43 Castlereagh Street, containing the existing museum building is designated under section 29 Part IV of the *Ontario Heritage Act*. The proposed site alteration is located at the rear (north) of Memorial Hall and extends westward as a one-storey addition, connecting to the rear of 25 Castlereagh Street. As previously noted, the two-storey addition received *Ontario Heritage Act* approval in 2021 from the Town. An

HIA was included as part of the 2021 application. The heritage-related impacts and mitigation measures discussed in this Report focus specifically on the proposed connection between 25 and 43 Castlereagh Street. This westward extension from the proposed two-storey addition will be visible from Castlereagh Street in the space between the two existing buildings. This space is currently used for driveway and parking purposes, as shown in **Photo 3**. The proposed connection is set back behind the existing buildings, and the mature trees and the existing buildings along the Castlereagh Street right-of-way will provide a natural visual barrier, ensuring the proposed connection is largely screened from the streetscape except when viewed directly from the front. This approach will help conserve the existing streetscape character, while planned landscaping enhancements will further improve the overall appearance. As a result, the proposed development will not negatively impact the Castlereagh Street frontage.

Lastly, to address policy 6.5.1.7, this Report references the previous heritage approvals (refer to Section 2.3 and 3.2 of this Report) and outlines how the proposed development meets the provincial requirements for cultural heritage conservation. The potential impacts on the Subject Land’s heritage attributes, along with recommended mitigation measures, are discussed in **Appendix 8** of this Report. A future *Ontario Heritage Act* permit will also be required.

SUMMARY

Based on the foregoing, the proposed Application conforms to the policies of the Niagara Official Plan by supporting the expansion of the existing museum building that contributes to the economic vitality of the area, utilizing existing municipal infrastructure, and conserving cultural heritage resources.

5.4 Town of Niagara-on-the-Lake Official Plan (Office Consolidation 2017)

The Town of Niagara-on-the-Lake Official Plan (“Town’s OP”) sets out policies to guide physical growth and policies to address a wide variety of social, economic and environmental concerns in the Town.

As outlined in **Table 2** and shown in **Appendix 3**, the Subject Lands are located within the Urban Area and Built-Up Area, designated Established Residential and within an Area of Archaeological Potential. Davy Street and Castlereagh Street are both identified as Local Roads.

Table 2 – Town’s OP Schedules and Designations of Subject Lands

SCHEDULE	SUBJECT LANDS DESIGNATION
Schedule B: Land Use Plan	Established Residential
Schedule G: Transportation Plan	Davy Street and Castlereagh Street are both identified as Local Roads

Schedule H: Archaeological Potential	Subject Lands are within Areas of Archaeological Potential
Schedule I-1: Old Town Urban Structure	Subject Lands are within the Urban Area Boundary and Built-up Areas of Old Town

5.4.1 Archaeology and Heritage Conservation

Section 6.1 and 18 of the Town’s OP provides the following policies regarding archaeology and heritage conservation:

POLICY

6.1 ARCHAEOLOGICAL SURVEY

As a condition of a planning application for the development or redevelopment of land, the municipality in consultation with the authority having jurisdiction may require the proponent to undertake an Archaeological Survey for the purposes of determining whether prehistoric or historic archaeological resources exist on site and determining an appropriate course of action should these resources be found. Detailed requirements are contained in SECTION 18: HERITAGE CONSERVATION.

SECTION 18: HERITAGE CONSERVATION

18.2 GOALS AND OBJECTIVES

(1) To protect, preserve and encourage the restoration of the original architectural detail wherever feasible on all buildings having architectural and historical merit within the context of the Town of Niagara-on-the-Lake, as well as on all buildings contributing towards the heritage value of the Town of Niagara-on-the-Lake.

(2) To encourage good contemporary building design by using sympathetic forms while avoiding simply copying historic architecture. To restrict building design that is not compatible with existing structures or unsympathetic alterations to buildings that would detract from the character of a Heritage Resource. Where lands or buildings have been designated pursuant to the Ontario Heritage Act the provisions of that Act regarding buildings and additions shall apply. [...]

(3) To prevent the demolition, destruction or inappropriate alteration or use of heritage resources.

(5) To develop and encourage creative, appropriate and economically viable uses of heritage resources.

18.3 HERITAGE POLICIES

(4) Criteria for Assessing New Development

Where a planning application has been received that proposes new development in the municipality, the Planning & Development Services Department for the Town shall include LACAC as a commenting agency to be given an opportunity to review the application and provide comments. The comments from all circulated agencies shall form part of the required planning report prepared by the Town. The review by LACAC shall address the following:

- a) The impact of the development on existing heritage resources*
- b) The proposed building design and its effect on the historic character of abutting properties and the streetscape.*

18.4 GENERAL HERITAGE CONSERVATION POLICIES

(2) It shall be the policy of Council to encourage the preservation of buildings and sites having historical and/or architectural values.

(5) Council shall exercise its legislative authority to control the alteration or demolition of heritage. Where Council has through by-laws designated individual buildings or districts under The Ontario Heritage Act, and established an area of Demolition Control under Section 33 of the Planning Act, 1983, no person shall demolish the whole or any part of the designated property or property in a designated area, or alter or make additional to a designated property or property in a designated area, without first receiving a permit issued by Council.

(6) Council, with the advice of LACAC, will regulate and guide alterations and additions to heritage resources. Council may also request comments from LACAC for any development within a Heritage District, proposed expansion area or where it is believed that a development may impact on heritage resources.

18.5 ARCHAEOLOGICAL PLANNING

(1) An archaeological resource assessment may be required by the Regional Municipality of Niagara as the delegated authority (Planning and Development Department) in consultation with Town of Niagara-on-the-Lake as a result of a planning application should any portion of the subject property fall within a zone of archaeological potential as shown on Schedule “H” to this Official Plan or where an archaeological site has been previously registered on the property.

(2) An archeological assessment will be required for the entire property.

(3) Proponents will be encouraged to complete the necessary assessment and/or site mitigations prior to submitting their planning application. Where this is not possible the following ARCHAEOLOGICAL CONDITION will be included as part of any approval:

ARCHAEOLOGICAL CONDITION:

The proponent shall carry out an archaeological assessment and mitigate, through preservation or resource removal and documentation, adverse impacts to any significant archaeological resources found. No demolition, grading or other soil disturbances shall take place on the subject property prior to the Town, the approval authority being the Regional Municipality of Niagara and the Ministry of Tourism, Culture, and Sport confirming that all archaeological resource concerns have met licensing and resource conservation requirements.

The property will be assessed by a consultant archaeologist, licensed by the Ministry of Tourism, Culture, and Sport under the provisions of the Ontario Heritage Act (R.S.O. 1990); and any significant site found will be properly mitigated (avoided or excavated), prior to the initiation of construction, servicing, landscaping or other land disturbances. When adopted as Council policy the proponent agrees to adhere to the procedures of the “Contingency Plan for the Protection of Archaeological Resources in Urgent Situations”.

ANALYSIS

Schedule H of the Town’s OP identifies the Subject Lands as being within an area of archaeological potential. The pre-consultation agreement, dated October 02, 2025, identified the need for an Archaeological Assessment as the proposal involves ground disturbance. Stage 1-2 archaeological assessments were conducted for 43 Castlereagh Street, and both assessments found no archaeological materials during the field surveys. A Stage 1 Archaeological Assessment for 25 Castlereagh Street was completed on December 9, 2025, recommending Stage 2 archaeological work, which is proposed to be undertaken in spring 2026. An expedited review and acceptance letter from MCM to facilitate inclusion of the Stage 1 Archaeological Assessment in the Ontario Public Register of Archaeological Reports has been requested. This letter is forthcoming and will be provided during the review of the ZBA application.

As previously noted, the Subject Lands are not located within the Queen-Picton Heritage Conservation District (HCD) boundary. However, the HCD is currently undergoing a review for potential expansion, and the Subject Lands fall within the proposed expanded HCD. The property at 43 Castlereagh Street is designated under section 29 Part IV of the *Ontario Heritage Act*. The proposed connection will require an *Ontario Heritage Act* permit approval, in accordance with Policy 18.4 (5).

In addressing policy 18.4 (6), the proposed building addition is located at the rear (north) of Memorial Hall and extends westward as a one-storey addition, connecting to the rear of 25 Castlereagh Street. The scale and massing of the proposed connection are secondary and subordinate to the existing buildings on the Subject Lands. The proposed connection is set back behind the existing buildings, and the mature trees and the existing buildings along Castlereagh Street will provide a natural visual barrier, ensuring the proposed connection is largely screened from the streetscape except when viewed directly from the front. The proposed connection is intended to blend harmoniously with the existing buildings, and detailed design elements will be provided as part of the required *Ontario Heritage Act* permit application and Site Plan Approval process. The potential impacts on the Subject Land's heritage attributes, along with recommended mitigation measures, are discussed in **Appendix 8** of this Report.

5.4.2 General Policies

The following general policies regarding building height restrictions, public street frontage, parking and special events are provided in the Town's OP.

POLICY

6.4 BUILDING HEIGHT RESTRICTIONS

The Town of Niagara-on-the-Lake consists of low-rise structures in a small town setting with a large number of historic buildings. Generally, the building height has not exceeded 11 metres (36 feet). For the most part this low-rise character should be maintained and the implementing zoning by-law should limit building height accordingly. Special provisions may also be included in the implementing zoning by-law limiting the building height to less than 11 metres (36 feet) in low density residential, and established residential areas where the majority of the buildings are one or 1 1/2 storeys in height.

6.11 FRONTAGE ON A PUBLIC STREET

Development will only be permitted where the lot has frontage onto a public roadway.

6.21 PARKING AND LOADING FACILITIES

Off-street parking areas and loading facilities shall be provided for the applicable uses as required by the implementing Zoning By-law. Access points to parking areas and loading areas shall be limited in number and designed in a manner which will minimize the danger to pedestrian and vehicular traffic in the immediate area and compatible with abutting properties.

ANALYSIS

Section 6.4 stipulates that building heights in established residential areas should generally not exceed 11 metres, to conserve the low-rise character of portions of the Town. The proposed additions to the museum are anticipated to be one- and two- storeys in height, with the two-storey structure behind Memorial Hall measuring 11.5 metres, which is a minor increase from the 11-metre guidance provided in Section 6.4. An increase in height has been requested through the site-specific zoning provision. Please refer to the justification provided in Section 6.2.4 of this Report. As such, the proposed addition is a low-rise structure, aligning with the policy intention (“should”) of maintaining the Town’s scale of building height and residential setting.

In response to Section 6.11, the Subject Lands have frontage on Davy Street and Castlereagh Street, both of which are public (local) streets.

Section 6.21 requires the implementing Zoning By-law to address off-street parking areas for the applicable use. The implementing By-law for 43 Castlereagh Street does not require any parking for the existing museum, while two (2) parking spaces are provided on 25 Castlereagh Street for the exclusive use of staff members. The proposed building addition and programming requires 13 parking spaces, which is detailed in Section 6.6 of this Report. However, no additional parking spaces have been proposed as part of this Application, due to the following reasons:

- There is no space to accommodate additional parking on the Subject Lands without disturbing the existing built form and landscaped/open spaces area on the property. Any new parking on the Subject Lands could compromise the view of the historic building façade, which contributes to the overall streetscape character.
- Policy 20.3 (5) discourages the creation of off-street parking through the removal of heritage sensitive buildings in Old Town. In keeping with this policy, the proposal conserves the heritage attributes of the Subject Lands, as designated under Part IV of the *Ontario Heritage Act*. The additional parking requirements due to the proposed building addition and support for the proposed parking deficiency is elaborated further in Section 6.2.7 of this Report. As such, the museum currently operates without on-site parking, as supported by the site-specific zoning provision.
- The Parking Letter prepared by UrbanTrans, dated December 12, 2025, confirms that that any incremental parking demand generated by the proposed development can be accommodated within the existing on-street parking capacity in the immediate vicinity of the Subject Lands.
- There are currently nine (9) on-street parking spaces on Castlereagh Street, which are designated by municipal signage for exclusive museum and visitor use. The Town’s Operations Department have advised that the designated museum parking signs will be relocated to fully encompass both properties at 25 and 43 Castlereagh Street, resulting in a total of twelve (12) on-street parking spaces, including one (1) Accessible Parking Space.

- Lastly, the Subject Lands proximity to the tourist-serving Queen-Picton commercial area, access to Niagara Region Microtransit service, and connection to a sidewalk that is part of a grid-pattern street network all support the use of active transportation.

5.4.3 Land Use Compatibility

Section 6.7 and 6.20 of the Town's OP provides the following policies regarding land use compatibility:

POLICY

6.7 DEVELOPMENT OF NON-RESIDENTIAL USES

As conditions of approval for development or redevelopment of any non-residential use of an urban nature, the municipality may require the following along any side or rear lot line which adjoins a residential or other non-compatible use:

- a) Yards greater than the minimum normally required;*
- b) Planting strips, screening, fencing and/or berms;*
- c) Deflected lighting; and*
- d) Prohibitions on parking, loading and/or open storage.*
- e) Where a non-residential use is an industrial use an adequate separation distance shall be required by the Town in consultation with the authority having jurisdiction.*

6.13 HISTORIC SITES

Historic sites, which means a building, place or thing, either in original or recreated form which depicts the history or culture of the community and includes museums, parks, unusual architectural specimens, historic monuments, cairns, burial grounds, commemorative plaques and illustrations of earlier Canadian historical life, will be permitted in any land use classification of the Official Plan. Any other use of the property shall comply with the land use designations and policies of this plan.

6.20 NON-COMPLYING USES

The land use polices and designations of this plan represent a concept which will be worked towards. However, it is recognized that there are existing in the Town many uses of land that do not presently comply with this concept and that this situation is likely to persist for a long time. Moreover, many of these uses have been established for a considerable number of years and frequently a large measure of stability has been

obtained between them and their neighbors. While a conscious planning program would not seek deliberately to foster a mixture of uses that were believed to be detrimental to each other, it must be recognized that there are many existing situations that can be tolerated in the interim without serious adverse results.

The Plan, therefore, while endeavoring to obtain a high degree of land use compatibility for new development, intends that there be a greater degree of leeway in land use for existing areas where time and custom have achieved acceptable levels of compatibility.

(3) It is the policy of the Plan that incompatible non-conforming uses will be progressively eliminated by purchase or exchange of land or they may disappear by voluntary termination in the course of time.

(4) Where a property contains a non-complying use the use may expand including expansion onto neighbouring properties in accordance with the following:

a) The expansion will not seriously jeopardize the possibility of future developments in their vicinity that may comply more closely with intent of this Plan;

b) In any such expansion special efforts are made to enhance the compatibility of the uses and to improve amenity and design; more specifically, matters dealing with buffering, landscaping, parking and vehicular circulation will be given attention;

c) The expansion or re-development is only permitted through an amendment to a zoning by-law;

d) The expansion must not supersede Urban Area boundaries or involve a major intensification of land use.

(5) Where a zoning change as provided for in Policy (1) or where an expansion of a nonconforming use is proposed under Policy (4) the proponent shall submit to the Town Council for review and approval a planning impact analysis.

ANALYSIS

The proposed building additions are located primarily to the rear of the Subject Lands, which abut established residential areas as shown in Schedule B of the Town's OP. The proposal is therefore assessed as a non-residential use abutting residentially zoned lands along its north and west lot lines.

6.7.a): The requested site-specific zoning amendment is assessed against the requirements of the existing zoning framework for 43 Castlereagh Street (Section 7.14.54

of the Town's Zoning By-law) and the Institutional Zone (Section 7.10.2 of the Town's Zoning By-law). The proposed two-storey addition is setback 5 metres from the northerly lot line (rear yard setback) as required by the existing site-specific zoning requirement, while a setback of 1.8 metres from the easterly lot line (interior side yard) and 5.9 metres from the westerly lot line (interior side yard) are provided, where a 3-metre setback is required. The justification for the requested setbacks is elaborated further in Section 6.2 of this Report. A Draft Zoning By-law Amendment is appended to **Appendix 6** of this Report.

6.7.b): Similar to the above, the existing zoning framework for 43 Castlereagh Street does not require a 3-metre setback when abutting a residential zone, whereas the Institutional Zone imposes this requirement. This affects the western and northern lot lines interfacing with the adjoining residentially zoned lands for the proposed addition on 25 Castlereagh Street, and the easterly lot line on 43 Castlereagh Street, where a setback of only 1.8-metre is achieved. The Draft Zoning By-law Amendment recommends carrying forward the established provision into the consolidated by-law. The Draft Zoning By-law Amendment is appended to **Appendix 6** of this Report.

6.7.c): Lighting associated with the building addition will be limited to decorative fixtures, which will be largely screened by existing and proposed landscaping and will not create adverse impacts on the abutting residential parcels. As such, detailed lighting plans will be reviewed as part of the Site Plan Approval application.

6.7.d): There are no parking spaces located adjacent to the residential parcels to create any adverse impacts.

As per Section 6.13 of the Town's OP, museums, being buildings depicting the history or culture of a community, are permitted in any land use classification of the Town's OP. In this case, the Subject Lands are designated Established Residential, where museum use may be permitted, subject to meeting relevant criteria in the Town's OP. Historically, 43 Castlereagh Street has accommodated institutional uses since its initial development, as noted in Section 2.1 of this Report. Additionally, Minor Variance A-01/25 granted permission for museum-related office use at 25 Castlereagh Street. Based on the analysis undertaken in Sections 5.4.7 and 5.4.8 of this Report, the museum use is permitted under the Established Residential designation, and the proposed development conforms to the Town's OP.

Section 6.20 of the Town's OP provides direction for non-complying uses. These policies are not applicable to the proposed development however they have been reviewed as requested by staff through the Pre-consultation Agreement relating to the expansion of non-complying uses onto neighbouring properties. While Policy 6.20 (3) is mentioned in the Agreement, it relates to the elimination of incompatible non-conforming uses. We believe the intended policy reference is Policy 6.20 (4) of the Town's OP, which discusses expansion of non-complying uses. The museum is a permitted use through the Town's OP. However, as requested by Town staff, the proposal is assessed against the criteria as follows:

6.20 (4) a): The proposed expansion does not jeopardize the potential for future development in the surrounding area that aligns with the intent of the Town’s OP. The museum is a long-standing institutional use that contributes positively to the community’s heritage. The proposed addition can be considered a modest expansion to the existing museum facility.

6.20 (4) b): The proposed building addition is anticipated to be one- and two- storeys in height, which is consistent with the built form in the immediate surrounding area. Further, the site design incorporates landscape enhancements and pedestrian connections that improves integration with the streetscape. Lastly, the existing and proposed trees and plantings will provide effective screening from the abutting residential properties. No on-site parking spaces or driveway access for vehicles are proposed, which help maintain the character of the area.

The limited scale of the addition ensures the proposal reinforces the character of the area while improving the functionality of the museum facility. As such, the proposed additions have been carefully designed to enhance compatibility with surrounding residential properties.

6.20 (4) c): The proposed building addition is being advanced through a Zoning By-law Amendment, as required by this policy.

6.20 (4) d): The Subject Lands are within the Urban Area boundary. The proposed building addition is limited to supporting the museum’s operational and programming needs, maintaining the existing institutional function of the Subject Lands.

Lastly, as required by Policy 6.20 (5), a Planning Impact Analysis has been undertaken in the following sub-section of this Report.

It is important to note that the Town’s OP allows for a greater degree of flexibility in land use within existing areas “*where time and custom have achieved acceptable levels of compatibility*” (Section 6.20 of the Town’s OP). The museum has operated at this location since 1907, as per the timeline described in Section 2.1 of this Report. Based on the analysis provided above, the proposed development is compatible with the surrounding residential character of the area.

5.4.4 Planning Impact Analysis

Section 6.23 of the Town’s OP provides policies regarding a Planning Impact Analysis, which requires the submission of “*a Planning Impact Analysis[...].as part of any application for an Official Plan and/or Zoning change.*” The Official Plan further notes the purpose of the Impact Analysis as follows:

The Impact Analysis is required to determine the appropriateness of the proposed change and to identify ways of reducing any adverse impact on surrounding land uses. It is understood and expected that the Planning Impact Analysis will address broader issues when development is proposed that requires an amendment to this Plan. In the same sense, a minor application will not be expected to provide the

level of detailed analysis as would be required for significant developments. Town Council shall be the final arbiter in determining the level of analysis required.

Table 3 below provides a review and discussion of the matters to be considered for a Planning Impact Analysis in the context of the proposed Application.

Table 3 – Planning Impact Analysis

No.	Policy Requirement	Analysis of Proposed Development
a)	<p><i>Compatibility of the proposed use with surrounding land uses, and the likely impact of the proposed development on present and future land uses in the area and on the character and stability of the surrounding neighborhood. Where developments require an amendment to this Plan and are considered significant in terms of land area or impact the effect on the community and municipality must be addressed;</i></p>	<p>The proposed Application is compatible with the surrounding uses and would not impact the character, future land uses, and/or stability of the surrounding neighbourhood. The Application is proposing an extension to the rear of the Subject Lands. The proposed development complies with the setback requirements, except for the front yard and interior side yard setback. The existing site-specific zoning provisions are being carried forward for 43 Castlereagh. A detailed analysis and justification for the requested relief is discussed in Section 6.2 of this Report. The majority of the backyard of 25 Castlereagh Street will remain open and landscaped. The following is also relevant:</p> <ul style="list-style-type: none"> • Retention of the existing museum and building on 25 Castlereagh Street support the existing character of the area and streetscape being retained. • The museum use has existed for at least 118 years (since 1907 as per the historical research undertaken in Section 2.1 of this Report), having operated compatibly and harmoniously with the adjacent residential uses. The continuation of these uses is not anticipated to negatively impact the surrounding neighbourhood.

No.	Policy Requirement	Analysis of Proposed Development
		<ul style="list-style-type: none"> No Official Plan Amendment is required for this application.
b)	<p><i>The height, location, and spacing of any buildings in the proposed development, and any potential impacts on surrounding land uses;</i></p>	<p>The new additions proposed to the existing buildings are to be one- and two- storeys high, which is compatible with the surrounding residences which are of similar height. This is not anticipated to result in any impacts on the surrounding land uses. Further, the existing buildings on the Subject Lands would remain, which would maintain the existing streetscape on Castlereagh and Davy Streets.</p>
c)	<p><i>The extent to which the proposed development provides for the retention of existing vegetation or natural features that contribute to the ecological integrity and visual character of the surrounding area;</i></p>	<p>The proposed development prioritizes the conservation of existing trees, with the removal of only four (4) trees. The majority of trees on the Subject Lands will be retained, as illustrated on the Tree Inventory, dated December 19, 2025. A detailed tree protection plan will be finalized at the Site Plan Approval stage, following confirmation of the detailed servicing design. As such, there are no identified natural heritage features on the Subject Lands.</p> <p>Additionally, the proposal provides additional landscaping along the main entrance, located between the existing buildings on the Subject Lands. This is an improvement from the current use of the space for driveway and parking purposes.</p>
d)	<p><i>Where a medium density residential development is proposed: the proximity to public open space and recreational facilities, community facilities and transit services, and the</i></p>	<p>Medium density residential is not proposed in this Application.</p>

No.	Policy Requirement	Analysis of Proposed Development
	<p><i>adequacy of these facilities and services;</i></p>	
<p>e)</p>	<p><i>The physical suitability of the land for such proposed use and any anticipated environmental effects. In the case of land exhibiting a potential hazard, consideration shall be given to;</i></p> <ul style="list-style-type: none"> <i>(i) the existing environmental and/or physical hazards.</i> <i>(ii) the potential impacts of these hazards.</i> <i>(iii) the proposed methods by which these impacts may be overcome in a manner consistent with accepted engineering techniques and resource management practices.</i> <i>(iv) the costs and benefits in monetary, social and environmental terms of any engineering works needed to overcome the hazard.</i> 	<p>The Subject Lands are physically suitable for the proposed additions to the existing museum building. There are no known environmental or physical hazards on the Subject Lands.</p>
<p>f)</p>	<p><i>The size and shape of the parcel of land on which the proposed development is to be located, and the ability of the site to accommodate the intensity of the proposed use.</i></p>	<p>The Subject Lands are an irregularly shaped but largely rectangular lot, with the longer side oriented along Castlereagh Street. The existing buildings are positioned closer to the street, while the rear portions of the Subject Lands remain largely vacant. This configuration provides an opportunity for expansion, as the proposed additions can be accommodated toward the rear without disrupting the established streetscape or neighbouring properties. The following points demonstrate that the</p>

No.	Policy Requirement	Analysis of Proposed Development
		<p>Subject Lands are capable of accommodating the expanded museum use:</p> <ul style="list-style-type: none"> • Museum use is permitted under the Established Residential designation (as per the analysis of Sections 6.13, 9.3.3 (1) and 15.3.1 (1) of the Town’s OP). • The proposed addition is one to two storeys high, consistent with the surrounding built form. • The development is compatible with the surrounding residential uses in terms of scale, massing, setbacks and character. There are no adverse shadowing or privacy impacts anticipated on the surrounding lands. • The proposed design achieves a balance between the newly built area and open space preserved on the Subject Lands. Approximately 64% of the Subject Lands remains landscaped open space, providing opportunities for stormwater infiltration, tree preservation and maintaining the existing streetscape. Retaining the majority of the backyard space on 25 Castlereagh Street ensures the proposed development remains compatible with adjacent residential properties. • Although no on-site parking or loading spaces are proposed, UrbanTrans’ Parking Letter confirms that the parking demand generated by the proposed development can be accommodated within the existing on-street parking capacity in

No.	Policy Requirement	Analysis of Proposed Development
		<p>the immediate vicinity of the Subject Lands.</p> <p>Overall, the proposed development demonstrates that the Subject Lands are capable of accommodating the expanded museum use.</p>
<p>g)</p>	<p><i>The potential effect of the proposed use on the financial position of the municipality where a development is of a size that would have an impact in this regard.</i></p>	<p>The proposed Application would not have an adverse impact on the financial position of the Town. It would support the Town’s tourism and local economy by helping draw visitors to the area. The proposed expansion will facilitate opportunities for visitors, supporting surrounding commercial and tourism-oriented uses.</p>
<p>h)</p>	<p><i>The adequacy of the existing roadway system to accommodate the proposed use and the location of vehicular access points and the likely impact of traffic generated by the proposal on streets, pedestrian and vehicular safety, and on surrounding properties.</i></p>	<p>The Subject Lands front onto Davy and Castlereagh Street. There is no on-site parking or loading spaces nor any driveway access proposed on the Subject Lands.</p> <p>The Parking Letter, prepared by UrbanTrans, dated December 12, 2025, confirms that the parking demand generated by the proposed development can be accommodated within the existing on-street parking capacity in the immediate vicinity of the Subject Lands. As such, the Application is not expected to generate adverse impacts on parking and traffic in the locality.</p>
<p>i)</p>	<p><i>The regulations of the Regional Niagara Policy Plan, Niagara Peninsula Conservation Authority, the Niagara Escarpment Commission, Niagara Parks Commission, Provincial Policy and the requirements or regulations of any</i></p>	<p>The Provincial and Regional regulations, policies, and plans pertaining to the Applications have been addressed in Sections 5.2 to 5.3 of this Report, which concludes that the proposed Application is consistent with</p>

No.	Policy Requirement	Analysis of Proposed Development
	<i>other applicable government department or agency.</i>	and conforms to the applicable policies of these plans.
j)	<i>The servicing capabilities of the area and capacity of municipal services to accommodate the proposed use which shall include the drainage of the property and address the need for a storm water management plan.</i>	The Subject Lands are connected to existing municipal infrastructure for water, sewer and stormwater services, as confirmed in Hallex’s FSDB.
k)	<i>The location and adequacy of lighting, screening, and parking areas.</i>	There is no on-site parking or loading spaces nor any driveway access proposed on the Subject Lands. The proposal maintains the pedestrian-oriented nature of the neighbourhood and minimizes potential impacts on adjacent residential uses. Further details regarding landscaping, lighting and screening will be discussed at the Site Plan Approval process.
l)	<i>Provisions for landscaping and fencing.</i>	The retained trees (as shown on Davey Resource Group’ Tree Inventory) and proposed trees and plantings (as shown on Site Plan Planting SK-002, of the Architectural Drawing Package) will be sufficiently able to buffer the proposed building addition from the adjacent residential uses.
m)	<i>The location of outside storage, garbage and loading facilities.</i>	No new outside storage, garbage, or loading facilities are proposed with this Application.
n)	<i>The need and desirability of the use.</i>	The museum use exists on the Subject Lands and has been in this location since 1907. The proposed Application is desirable as it would support the Town by drawing visitors to the area and positively contribute to the local economy and tourism sector. Located in Old Town, the building additions and

No.	Policy Requirement	Analysis of Proposed Development
		<p>site enhancements will allow for programming providing patrons with educational activities, and enhancing the function of the existing museum use.</p>
o)	<p><i>The effect on the agricultural land base.</i></p>	<p>This is not applicable as the Subject Lands are located within the Urban Area.</p>
p)	<p><i>The identification of environmental, archaeological and heritage resources in the area and how the development will impact on those resources.</i></p>	<p>There are no known environmental resources on the Subject Lands.</p> <p>The Subject Lands are located within an area of archaeological potential as identified in the NOP, Niagara Region Archaeological Management Plan and the Town's OP. Archaeological work has been completed for 43 Castlereagh Street. A Stage 1 Archaeological Assessment has been completed for 25 Castlereagh Street recommending a Stage 2 Archaeological Assessment. 43 Castlereagh Street is designated under Section 29 Part IV of the <i>Ontario Heritage Act</i>. A future <i>Ontario Heritage Act</i> permit will be required.</p>
q)	<p><i>The availability of alternative sites where the application proposes an amendment to the Official Plan to change a land use designation or expand an urban boundary.</i></p>	<p>This is not applicable as the Application is not proposing an Official Plan Amendment nor an urban boundary expansion.</p>
r)	<p><i>Measures planned by the applicant to mitigate any adverse impacts on surrounding land uses and streets which have been identified in the Planning Impact Analysis including the submission of detailed plans sufficient to show how the items of this policy have been complied with.</i></p>	<p>The proposed building additions are not anticipated to generate adverse impacts on the surrounding land-uses and streets. The existing Memorial Hall building on 43 Castlereagh Street has operated as a museum facility for 118 years (since 1907 as per the historical research undertaken in Section 2.1 of this Report), which has operated</p>

No.	Policy Requirement	Analysis of Proposed Development
		<p>compatibly and harmoniously with the surrounding uses. The continuation of these uses is not anticipated to negatively impact the surrounding neighbourhood. In addition, the proposal maintains the established streetscape by preserving the existing buildings, which collectively contribute to the character of the area.</p> <p>The landscaping is envisioned to consist of a combination of coniferous trees, shrub/hedges and ground cover to define the new entrance. As illustrated on Davey Resource Group’s Tree Inventory, majority of the existing trees will be preserved, ensuring that the existing character of the street is minimally impacted by the proposed building addition.</p>

5.4.5 Servicing

Section 6.30 of the Town’s OP provides the following policies regarding servicing:

POLICY

6.30 SERVICING POLICIES

(1) GENERAL POLICIES

a) New development will be limited by the available capacities of services.

d) Land/soil stripping during pre-servicing and servicing activities, as part of new development shall not be permitted unless prior written authorization has been received from the municipality. Maintenance of ground cover for both erosion, sedimentation and dust control will be required. The municipality may consider controlling the removal of topsoil in the municipality in a by-law pursuant to the Top Soil Preservation Act.

(2) SANITARY SEWERS

c) *Within any Urban Boundary development shall be required to connect to municipal sanitary sewers upon confirmation that sewage treatment capacity is available.*

(4) DRAINAGE

a) *No development shall occur without appropriate regard for storm run-off, on-site collection and channeling of storm water to an adequate outlet. Drainage shall be to a storm sewer outlet satisfactory to the Town.*

e) *Design of development proposals shall incorporate on-site control techniques to minimize peak storm water flows, and to ensure adequate water quality treatment*

f) *Permanent or temporary sediment retention basins may be required to control quantities of suspended materials washed from the sites.*

h) *Development shall be permitted only on lands having soil and drainage conditions which are suitable for development and only with appropriate storm water management and sediment control.*

ANALYSIS

The Subject Lands are connected to existing municipal service, and the building addition is also proposed to be connected to the available municipal servicing, as per Hallex's FSDB, dated December 16, 2025.

In accordance with Policy 6.30 (4), the storm water sewer along Davy Street will be utilized for stormwater drainage purposes. Hallex's FSDB recommends implementing stormwater quantity and quality controls to minimize runoff volume and reduce contaminant loads entering the municipal facilities.

5.4.6 Tree Preservation

Section 6.33 of the Town's OP provides the following policies regarding tree preservation and reforestation.

POLICY

6.33 TREE PRESERVATION AND REFORESTATION

It is a policy of this Plan that existing trees must not be unnecessarily removed and that wherever possible existing trees should be preserved and protected. In urban areas where it is unavoidable that trees be removed the following policies shall apply.

(1) *As a condition of any development or redevelopment where it is unavoidable that trees must be removed. The proponent shall plant*

trees of a similar or comparable species having a minimum caliper acceptable to the Town elsewhere on the site and the Town may require the proponent retain the services of a qualified arbourist or similar professional. Where no other reasonable location exists on the site the town may require the owner to contribute to the town sufficient money to replant an equal number of new trees on public lands identified for reforestation by the Town.

(2) The Town will undertake to identify public lands owned by the municipality or by agreement lands owned by other public agencies where reforestation can occur

(3) Tree preservation and reforestation which encourages the reforestation with native species and naturalization of disturbed areas within the Niagara Escarpment Plan is encouraged; and

(4) In the case of dying or diseased trees particularly fruit trees which have the potential to infect healthy trees, such trees may be removed immediately and trees of an appropriate species shall be planted in accordance with policy (a) of this section.

ANALYSIS

The proposed development prioritizes the conservation of existing trees, with the removal of only four (4) trees. The majority of trees on the Subject Lands will be retained, as illustrated on Davey Resource Group's Tree Inventory, dated December 19, 2025. A detailed tree protection plan will be finalized at the Site Plan Approval stage, following confirmation of the detailed servicing design. According to Policy 6.33 (1), details regarding tree replacement will also be discussed at the SPA application stage.

5.4.7 Residential Policies

Section 9 of the Town's OP provides the following policies regarding residential

POLICY

9.2 GOALS AND OBJECTIVES

(3) To ensure that new development or redevelopment is appropriately located, is compatible with surrounding land uses, incorporates energy efficient aspects in its design, retains to the greatest extent feasible desirable natural features and uses land in an efficient manner.

(8) To minimize the potential for land use compatibility problems which may result from the mix of residential densities or the mix of residential and non-residential uses.

(11) To encourage the development of well-designed and visually distinctive forms.

9.3 LAND USE DESIGNATIONS

9.3.3 ESTABLISHED RESIDENTIAL

(1) In the established residential designation the following uses shall be permitted:

Uses permitted independent of a Main Use:

- Minor open space and community facilities subject to Section 15 of this Plan;

(4) Any construction of additions or new structures within this designation shall complement existing adjacent development in terms of its scale, character, height, design and mass.

(5) Several of the structures within the established Residential area have been designated as "Heritage" buildings under The Ontario Heritage Act. Every effort should be made by both the owner and the Town to ensure the continued existence of that structure in its historically significant form.

ANALYSIS

The proposed building addition is strategically located primarily at the rear of the Subject Lands. More specifically, the proposed one-storey connection, will be visible from Castlereagh Street in the space between the two existing buildings. The existing mature trees will provide a natural visual barrier, ensuring the proposed connection is largely screened from the streetscape except when viewed directly from the front. By retaining the existing buildings, the proposal conserves the heritage attributes on the Subject Lands, and the planned landscaping enhancements will further improve the overall streetscape. The property has operated as a museum since 1907, establishing a longstanding institutional use that is compatible with the adjacent residential land uses. The proposed additions are situated on the currently vacant portion of the Subject Lands, which allows for functional enhancements to the museum, supporting the museum's continued operation and improving its capacity to serve the community. The proposed development aligns with the goals and objectives of the Residential designation of the Town's OP.

Policy 9.3.3 (1) permits minor community facilities, subject to the provisions of Section 15 (Open Space and Community Facilities) of the Town's OP. A museum is recognized as a main use within the Open Space and Community Facilities designation, as per Policy 15.3.1 (1). As outlined within Section 2.1 of this Report, there has always been institutional use on lands known as 43 Castlereagh Street since its initial development. Further, through the approval of the Minor Variance application (A-01/25), 25 Castlereagh Street has been given the permission to be used for museum-related office use. As such, the proposed development will consist of a modest built-form, operating with limited staff and visitor volumes in comparison to larger institutional uses such as schools and community

centres. Its low-rise height, limited parking demand, and community-oriented programming ensure compatibility within the established residential context. A detailed analysis of Section 15 is provided in the following subsection.

As per Policy 9.3.3 (4), the proposed building additions and site plan enhancements complement the existing adjacent development in terms of scale, height, and massing. More specifically, the proposed addition is one and two storeys in height, which is consistent with the prevailing building heights in the surrounding area. Additionally, the retention of the existing buildings ensures that the massing and character from the street remain unchanged. The new addition is primarily located at the rear, minimizing its visibility and maintaining the sensitive streetscape.

In accordance with Policy 9.3.3 (5), as 43 Castlereagh Street is designated under section 29 Part IV of the *Ontario Heritage Act*, the existing museum building will be conserved. The proposed connection sensitively extends towards and connects to the rear of 25 Castlereagh, ensuring that the identified heritage attributes are conserved and protected.

5.4.8 Community Facility Policies

Section 15 of the Town's OP provides the following policies regarding community facilities:

POLICY

15.2 GOALS AND OBJECTIVES

- (1) To provide for appropriately located neighborhood parks, institutions and community facilities that are accessible to the people they serve, while not having an adverse effect on abutting land uses.*
- (2) To encourage the location of community facilities at strategic locations with convenient access for all residents of the community.*
- (3) To accommodate the changing needs of the community by allowing for re-development that is timely and appropriate.*

15.3 LAND USE DESIGNATIONS

15.3.1 OPEN SPACE AND COMMUNITY FACILITIES

- (1) In the Open Space and Community Facilities designation shown on the Land Use Schedules the following uses are permitted:*

Main Uses:

Active and passive neighborhood parks, elementary schools, health care facilities, churches, day care centers, cemeteries, museums, historic sites and similar community servicing uses.

- (3) LOCATION CRITERIA*

Minor open space and community facility uses, such as churches, neighborhood parks, recreation facilities, branch libraries and facilities for special population groups (including day care teaching of children) shall be permitted in residential land use designations without amendment to this plan subject to the following location criteria:

a) Direct or convenient access to an arterial or collector street as indicated on the Land Use schedules of this Plan.

b) Design which is compatible with surrounding land uses, maintaining the scale, density and character of the area.

c) Provision of adequate buffering and transition to protect surrounding existing development.

d) Provision of adequate off-street parking to serve the particular use, while retaining sufficient usable yard space to maintain the existing visual characteristics of the area.

e) On those streets which have been designated "no stopping" areas, provision shall be made for off-street locations to accommodate drop-off and pick-up of the users of such facilities.

ANALYSIS

Based upon the information outlined within Section 2.1 of this Report, an institutional use on 43 Castlereagh Street has been ongoing since the construction of the High School building in 1875. The proposed building additions represent an expansion of an existing, well-established community use, the museum, which has operated on the Subject Lands since 1907. This longstanding institutional use reinforces the museum's compatibility with surrounding residential land uses. Goal (2) of Section 15.2 emphasizes the importance of ensuring that development is appropriately located. The proposed additions are situated primarily at the rear of the Subject Lands, which preserves the visual integrity of the current streetscape. The existing buildings will be retained such that it continues to contribute to the area's existing character. The Town's OP also recognizes the evolving needs of the community and permits the redevelopment of community facilities that is timely and appropriate. This policy direction supports the proposed additions, which improves the functionality of the museum while maintaining compatibility with the adjacent land uses.

In considering Section 9.3.3(1) together with Section 15.3.1(1) of the Town's OP, museums may be permitted within the Established Residential designation, subject to meeting relevant criteria in the Town's OP. The locational criteria outlined in Policy 15.3.1 (3) are addressed as follows:

- a. Access to Arterial or Collector Street:** The proposed additions are to an existing, well-established museum facility, ensuring continued compatibility with the surrounding residential context. It fronts Castlereagh Street, a Local Road, and

has operated in the neighbourhood since 1949. King Street, which is a collector road borders the western side of the block, which contains the Subject Lands (as per Schedule 'G' Transportation Plan of the Town's OP).

- b. Compatible Design:** The proposed building additions and associated site plan enhancements are intended to complement adjacent residential properties in terms of scale, character, height, design, and massing. The building at 25 Castlereagh Street, previously a residential dwelling, will be conserved and incorporated into the museum facility. The retention of this building ensures that the residential character of the immediate area is maintained, even as the building serves a community use. The proposed additions are intended to blend harmoniously with the existing buildings, and detailed design elements will be discussed as part of the future *Ontario Heritage Act* permit application and Site Plan Approval process.
- c. Buffering and Transition:** The proposed addition is located primarily at the rear of the Subject Lands, set back from the Castlereagh streetscape, minimizing impact on the established streetscape character. Further, the proposed building addition is one to two storeys, which is consistent with surrounding built form. Retention of the existing mature trees, as shown in Tree Inventory, dated December 19, 2025, and proposed new plantings along the property boundaries (as shown in Site Plan Planting SK-002, of the Architectural Drawing Package) will provide visual buffering from adjacent residential parcels.
- d. Parking:** There is no on-site parking or loading areas proposed, avoiding noise, traffic impacts adjacent to residential properties. The Parking Letter dated December 12, 2025, and prepared by UrbanTrans, analyzed peak demand and on-street capacity within approximately 250 metres of the Subject Lands. The analysis confirmed that any incremental parking demand generated by the proposed development can be accommodated within the existing on-street parking capacity in the immediate vicinity of the Subject Lands.
- e. Drop-off and Pick-up:** The museum does not require a dedicated off-street drop-off or pick-up area. Observations from the site visit, conducted on October 24, 2025, confirm that part of the road right-of way, adjacent to the Subject Lands, is used for on-street parking. The existing street configuration adequately supports the operational needs of the museum facility.

5.4.9 Transportation

Section 20 of the Town's OP provides the following policies regarding transportation:

POLICY

20.2.4 LOCAL ROADS

Schedule "G" "Transportation Plan" identifies the Local Roads in the Town.

- a) Local roads are intended to provide access to individual properties.*

c) *The right-of-way width for Local Roads shall be sufficient to accommodate the intended traffic volumes as well as on-street parking. The right-of-way width, the construction of the road and the location of all necessary services shall be the satisfaction of the Town.*

d) *Design of access to Local roads will ensure safety and ease of entry and exit of traffic.*

20.3 GENERAL TRANSPORTATION POLICIES

(3) *Daylighting or sight triangles, according to accepted traffic engineering standards, shall be provided wherever possible, at road intersections. The construction of buildings, signs and opaque fences and the planting of trees or high shrubs therein will be discouraged or prohibited.*

(5) *The development of off-street parking lots shall be encouraged, however within Niagara/Old Town, Queen-Picton Streets Heritage Conservation District parking lots shall not be created by the removal of heritage sensitive buildings, nor shall the parking lot have exposure to Queen and Picton Streets except by signage. The following policies shall also apply:*

d) *On-street parking in Residential areas may be restricted, and/or prohibited.*

f) *A cash-in-lieu of parking policy and by-law, as provided for under Section 39 of the Planning Act, 1983, may be established to assist in resolving the issue of providing parking in a planned and orderly manner, while allowing the development or redevelopment of lands in established areas of the Town.*

Municipal Roads Section

Street/Road	Designated Road Right-of-way Width
<i>All Urban Roads</i>	<i>20 m</i>

ANALYSIS

According to Schedule “G” Transportation Plan of the Town’s OP, both Castlereagh Street and Davy Street are designated as Local Roads. These roads are intended primarily to provide access to individual properties. The existing museum facility is accessed from Castlereagh Street, and the proposed development does not alter this access. The

access continues to serve the museum facility efficiently without necessitating any upgrades to the surrounding street network.

In response to Policy 20.2.4 c), a road widening was not requested through the pre-consultation agreement, which means both Castlereagh Street and Davy Street along the Subject Lands have rights-of-way of approximately 20 metres, consistent with the standard for urban local roads identified in the Town's OP. Castlereagh Street accommodates two-way traffic and on-street parking, on the north side of the street.

For Policy 20.2.4 d), there is no vehicular access to the Subject Lands proposed. The proposed site plan includes improvements to pedestrian access and landscaping that will better define and emphasize the museum's main entrance. The proposal maintains the pedestrian-oriented nature of the neighbourhood and minimizes potential impacts on adjacent residential uses.

Policy 20.3 (3) requires daylighting triangles at road intersections. The Subject Lands being a corner property will address the daylighting triangle at the intersection of Castlereagh and Davy Street. No new buildings, fencing, or opaque landscaping are proposed within the south corner of the property (Castlereagh and Davy Street intersection) that could impact sightlines. The existing condition at this corner will be maintained, as seen in **Photo 10**, to ensure compliance with daylight triangle requirements.

Policy 20.3 (5) discourages the creation of parking lots through the removal of heritage sensitive buildings in Old Town. In keeping with this policy, the proposal does not involve the demolition of any heritage structures. The proposed development is not intended to increase visitor traffic to the museum, but rather to enhance its operational efficiency. The site-specific zoning provision on 43 Castlereagh Street does not require any on-site parking spaces for the museum. There are two (2) parking spaces located on-site at 25 Castlereagh, permitted through Minor Variance A-01/25, approved on February 20, 2025. Although, these spaces were reserved exclusively for museum staff, they are now proposed to be removed as part of this Application. It is important to note that staff have worked in the Museum building without any dedicated parking for the office use prior to the Minor Variance approval.

No on-site parking is proposed, and staff and visitor parking will continue to rely on surrounding on-street parking facilities. This approach encourages the use of active modes of transportation. UrbanTrans' Parking Letter reinforces that it is common for historical sites and museums, particularly in Niagara-on-the-Lake, to rely primarily on on-street parking rather than dedicated off-street lots, as this approach preserves the historic streetscape, avoids large, paved areas that disrupt architecture, and aligns with municipal policies minimizing off-street parking requirements in conservation zones. The proposal supports a pedestrian-friendly environment and conserves the heritage character of the neighbourhood.

5.4.10 Implementation

Section 22 of the Town's OP provides the following policies regarding implementation:

POLICY

22.6 HOLDING

The Council may, in a Zoning By-law, by the use of the symbol "H" as a suffix, in conjunction with any use designation specify the use to which lands, buildings or structures may be put at such time in the future as the holding symbol is removed by amendment to the by-law. This procedure will enable Council to hold lands designated for specific land uses in this Plan until such time as the land is required for that use for phasing purposes or until necessary concept plans or subdivision designs have been prepared or servicing is available or until an archaeological resource assessment has been completed in accordance with Part 4, RESOURCE & MANAGEMENT POLICIES, Section 18, ARCHAEOLOGICAL PLANNING Policies of the Official Plan. Notice will be given by Council when a holding symbol is to be removed by by-law, pursuant to the provisions of the Planning Act.

22.7 INTERIM CONTROL Under the Planning Act a municipality may pass a by-law identifying an interim control area. The purpose of passing such a by-law would be to restrict or prohibit development, redevelopment or the use of land where a problem or concern exists that requires special study before development proceeds. As an example an Interim Control By-law could apply to an area and prohibit development where there is a proven lack of adequate municipal services or significant environmental or health problem. An interim control by-law can be in place for one year and can be extended for one additional year.

22.13 SITE PLAN CONTROL

(1) Council may, by by-law, designate areas where Site Plan Control will be in effect as provided in the Planning Act, 1983. The entire Town of Niagara-on-the-Lake, with the exception of land used or proposed for single detached or semi-detached dwellings, farm buildings other than greenhouses and/or packaging operations, is designated as a Site Plan Control Area. Single detached dwellings which have been identified by Council as being of historic or architectural significance are not to be exempt from Site Plan Control.

22.16 THE ONTARIO HERITAGE ACT

The Town of Niagara-on-the-Lake shall use the provisions of The Ontario Heritage Act to implement the heritage policies of this Official Plan. The

LACAC established pursuant to the Legislation shall advise and assist Council on all matters specified in The Ontario Heritage Act.

ANALYSIS

As previously noted, a Stage 1 Archaeological Assessment for 25 Castlereagh Street has been completed and submitted to MCM. The Stage 1 assessment recommends requiring a Stage 2 Archaeological Assessment prior to Site Plan Approval. This Stage 2 assessment is proposed to be undertaken in spring 2026. Additionally, ACC and the Museum have requested an expediated review and acceptance letter from the MCM confirming ACC's Stage 1 Archaeological Assessment. This letter is forthcoming and will be provided during the review of the ZBA application. In accordance with Section 22.13, a site plan application will be submitted as part of the Town's approval process.

Council approved the Revised Study Area By-law under Section 40.1 of the *Ontario Heritage Act*, establishing temporary restrictions on property alterations within the Queen-Picton (Old Town) Heritage Conservation District Study Area for one (1) year, with specific exemptions. The By-law has been in effect since March 27, 2025. The proposed development is exempt from this interim control by-law due to the valid 2021 Heritage Permit, as per Provision 6 of By-law No. 2025-010. *Ontario Heritage Act* permit approvals related to the proposed connection will be submitted at later stages of the development application.

SUMMARY

Based on the foregoing, the proposed Application conforms to the relevant policies of the Town's OP by expanding a community use that contributes to the Town's local economy and tourism sector, maintaining the pedestrian-oriented character of Old Town, ensuring compatibility with adjacent uses, and conserving cultural heritage resources.

5.5 Town of Niagara-on-the-Lake Official Plan (DRAFT)

The Town is undertaking an update to its Official Plan, a critical document that will guide growth, development, and municipal priorities for the next 25 years and beyond. The Redlined Draft Official Plan, dated November 19, 2025⁸, (or "Town's Draft OP") has been released for review and comment. This Draft focuses on the Official Plan Update theme areas of: Growth Management, Employment/Economy, Climate Change, Cultural Heritage, Transportation/ Infrastructure, among other things. Although the Town's Draft

⁸Redline Draft Official Plan: https://ehq-production-canada.s3.ca-central-1.amazonaws.com/39bcb96bcad310bce7f0196cae61fc46f65fd650/original/1763666421/2a549a18f4aff06764c9b3f2468b226b_Appendix%20I%20-%20Redlined%20Third%20Draft%20Official%20Plan.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKIII4DU7AG%2F20251201%2Fca-central-1%2Fs3%2Faws4_request&X-Amz-Date=20251201T194200Z&X-Amz-Expires=300&X-Amz-SignedHeaders=host&X-Amz-Signature=cfe64f770d630077033efaccf52995d600a3a289eea81b1079654ae249978eea

OP is not final and in-effect, the following Section provides a summary and analysis of the Town’s Draft OP as it relates to the Application.

As outlined in **Table 4** and shown in **Appendix 4**, the Subject Lands are located within the Built-Up Area of Old Town and designated Established Residential, the National Heritage District, and are designated, in part, Part IV under the *Ontario Heritage Act*. Castlereagh Street and Davy Street are both identified as Local Roads.

Table 4 – Town’s Draft OP Schedules and Designations of Subject Lands

SCHEDULE	SUBJECT LANDS DESIGNATION
Schedule B2: Land Use Plan – Old Town	Subject Lands are within the Settlement Area Boundary of Old Town and designated Established Residential
Schedule B7: Growth Plans	Subject Lands are within the Built Up Areas of Old Town
Schedule D1, D2 & D3: Heritage Resources & Archaeology Settlement Areas	<ul style="list-style-type: none"> • 43 Castlereagh Street is a Section 29 Part IV Designated Properties under the <i>Heritage Act</i>; • Subject Lands are <u>outside</u> the Queen-Picton Heritage Conservation District • Subject Lands are within National Heritage District • Subject Lands are identified as Areas of Archaeological Potential
Schedule E1: Transportation Network	Castlereagh Street and Davy Street are Municipal Roads (local)

5.5.1 Community Structure, Economic Strategy and Complete Communities

Sections 1.2, 1.3 and 1.6 of the Town’s Draft OP provides the following policies regarding community structure, economic strategy and complete communities:

POLICY

1.2 Community Structure

1.2.4 The settlement areas range in size and level of service but strive to be complete communities. With the exception of Glendale, the settlement areas are moderate in scale, with well-defined urban boundaries, serviced with municipal water and sewer services. Most contain a mix of land uses and well established, stable residential neighbourhoods.

1.2.5 Old Town and Queenston, in particular, include significant built heritage resources and cultural heritage landscapes that must be

conserved. Most of the Town's administrative, educational, health care, and community facilities are located in, or adjacent to, the settlement areas.

1.3 Economic Strategy

1.3.3 As key components of the Town's economic development strategy, the Town:

- f) will maintain and enhance its role as a centre for culture, heritage, education and recreation;*
- g) will promote new economic development and tourism opportunities;*
- h) will ensure the conservation of the Town's many built heritage resources; and*
- i) supports transportation and transit networks to move residents and visitors.*

1.3.4 In order to achieve strong economic diversity, it is recognized that the Town's natural and cultural assets, including the specialty crop area, agricultural system, built heritage resources, cultural heritage landscapes, and working landscapes are important economic drivers that will be leveraged responsibly and promoted to attract a range of innovative and diverse businesses and attract and retain youth and families.

1.6 Complete Communities

1.6.1 Sustainability

1.6.1.3 Sustainability is achieved through a variety of initiatives that can include:

- d) conserving working landscapes, and built heritage resources and cultural heritage landscapes;*
- e) providing choices and opportunities for housing, employment, transportation, social, recreational and cultural amenities;*
- g) making efficient use of public infrastructure by focusing on a compact, mixed use, walkable, and connected community, and support for active transportation alternatives;*
- i) promoting the adaptive re-use of existing buildings and structures and the redevelopment of brownfields and greyfields.*

1.6.2 Healthy Neighbourhoods

1.6.2.1 Healthy neighbourhoods and communities are essential to the quality of everyday life in Niagara-on-the-Lake, from housing to community services, arts and culture and heritage. Components of healthy communities in the Town include:

- a) vibrant, safe, walkable, complete settlement areas with a mix of housing, jobs, parks, shops and services in close proximity to each other;*
- d) Community Design and heritage guidelines to ensure growth will conserve and, where possible, enhance the built resources of the Town;*
- g) measures to protect the Town's scenic beauty, tree cover and landscaping;*
- h) support for education, arts and culture through strategically located public service facilities;*
- j) supporting walkable and bikeable neighbourhoods through active transportation;*

1.6.4 Community Infrastructure

1.6.4.1 Community infrastructure is integral to creating sustainable communities by providing facilities and services to meet the needs of residents.

ANALYSIS

The Subject Lands include a section 29 Part IV *Ontario Heritage Act* designated heritage property. The proposed development supports its conservation, as per Policy 1.2.5 of the Town's Draft OP, by retaining the existing buildings on the Subject Lands and sensitively integrating new additions at the rear (north) of Memorial Hall and extending westward as a one-storey addition, connecting to the rear of 25 Castlereagh Street. In accordance with Policy 1.3.3 and 1.3.4, the museum plays a vital role in supporting economic development and tourism. As a long-standing community facility, it attracts visitors to the area and enhances local tourism offerings. The proposed improvements will enhance the museum's operational efficiency, enabling it to better serve residents and visitors.

The proposal also aligns with Policy 1.6.1.3 g), which encourages the efficient use of land for community-serving uses. The proposal makes use of an underused portion of the Subject Lands for the proposed building additions without requiring new municipal infrastructure. Furthermore, Policy 1.6.1.3 i) supports the adaptive reuse of existing buildings. The continued use and conservation of the buildings at 25 Castlereagh Street, previously a residential dwelling and now contributes to the museum's operations, will

maintain the residential character of the immediate streetscape. Similarly, the continued use and retention of the buildings at 43 Castlereagh Street, ensures the heritage attributes of the property are conserved.

In accordance with Policy 1.6.2.1 (a), the proposed development offers an accessible and attractive cultural experience for both residents and tourists, reinforcing the Town’s vision for a vibrant, safe, walkable and achievement of complete settlement within the Old Town community.

In support of Policy 1.6.2.1 d) that requires the conservation of built heritage resources, on-site cultural heritage resources shall be conserved, and an *Ontario Heritage Act* permit application will be submitted in accordance with *Ontario Heritage Act* requirements at a later stage, ensuring compliance with heritage conservation requirements.

Additionally, Policy 1.6.2.1 h) promotes support for education, arts, and culture. These objectives are directly advanced through the museum’s programming and community engagement offerings. Landscape enhancements are proposed to improve the streetscapes and provide additional screening for adjacent residential properties. Tree preservation measures are also being considered to contribute to environmental sustainability.

The Town’s Draft OP defines Community Infrastructure as follows:

Community infrastructure refers to lands, buildings, and structures that support the quality of life for people and communities by providing public services for health, education, recreation, socio-cultural activities, security and safety, and affordable housing.

The museum and its extension support the quality of life for Town residents through the provision of museum services and activities, education, socio-cultural activities and recreation. By supporting the existing museum and its expansion, being community infrastructure in the Town’s Draft OP, the Application also support the development of complete communities.

5.5.2 Settlement Areas

Section 3 of the Town’s Draft OP provides the following policies regarding settlement areas:

POLICY

3.1 Identification

3.1.1 The lands identified as Settlement Areas on Schedule A (Community Structure) and Schedule B1 (Land Use) will be the focus of urban development. Settlement areas have municipally-provided services, including water and sewage services.

3.1.2 The five (5) settlement areas in the Town are: • Old Town • Queenston • St. Davids • Virgil • Glendale

3.2 Framework for Development

3.2.1 Schedules B2 to B6 outline the settlement area boundaries and land use designations for each of the settlement areas.

3.2.2 Schedule B7 outlines the Built-Up Areas and Greenfield Areas.

3.2.3 Development within the settlement areas will be planned to support transit, active transportation opportunities and improved pedestrian and vehicular circulation. It must also ensure the conservation of built heritage resources and cultural heritage landscapes.

3.2.4 It is the goal of this Plan that the settlement areas in the Town continue to evolve into complete communities where there is:

- g) a range of cultural and recreational opportunities and facilities; and,
- h) a population level and density that supports the provision of public transit, where feasible.

3.3 Settlement Area Boundaries and Built-up Areas

3.3.1 The settlement area boundaries are shown on Schedules B1 to B6. The boundaries of the Built-up Areas are delineated on Schedule B7.

ANALYSIS

The Subject Lands are located within the settlement area of Old Town and are designated Established Residential under Schedule B2 of the Town's Draft OP. Additionally, the lands are situated within the Built-Up Area, as identified in Schedule B7 of the Town's Draft OP.

In alignment with Policy 3.2.3, the proposed development benefits from its location within a designated settlement area, where growth is intended to be supported by existing infrastructure, including public transit, active transportation networks, and pedestrian-friendly circulation. Moreover, the development ensures the conservation of built heritage resources, by retaining the existing buildings and preserving the historic significance of the area.

5.5.3 Land Use Compatibility

Sections 3.7 of the Town's Draft OP provides the following policies regarding land use compatibility:

POLICY

3.7 Land Use Compatibility

3.7.1 Residential Neighbourhoods

3.7.1.1. *Neighbourhoods are stable but not static. There is a degree of change that occurs within neighbourhoods over time. This change will be appropriate and compatible with the Town's existing neighbourhoods and with the entire Built-up Area.*

3.7.2 Compatibility

3.7.2.1. *Intensification within the Built-up Areas shall be compatible with surrounding existing and planned land uses. Intensification and/or redevelopment should be compatible with the property and the surrounding neighbourhood by:*

- a) conserving natural heritage and built heritage resources and cultural heritage landscapes;*
- b) Existing and/or planned densities;*
- c) Lot frontages, area and depth;*
- d) Building setbacks;*
- e) Access;*
- f) Parking;*
- g) Servicing, lot grading and drainage; and,*
- h) The existing and/or planned height and massing of buildings.*

3.7.2.2. *Development proposals shall demonstrate compatibility and integration with surrounding land uses by ensuring that an effective transition in built form is provided between areas of different development densities and scale. Transition in built form will act as a buffer between the proposed development and existing uses and should be provided through appropriate height, massing, architectural design, siting, setbacks, parking, public and private open space and amenity space.*

3.8 Community Design

3.8.1 Policies

3.8.1.1 *The character of the Town is reflected in its built heritage resources and cultural heritage landscapes, including, but not limited to, its heritage character areas, rural landscapes, tree-lined urban and semi-urban streetscapes, low profile development, walkable communities, and variety of architectural and design features.*

3.8.2 Building Height Restrictions

3.8.2.1 *With the exception of Glendale, the Town consists of low-rise structures in a small town setting with a large number of built heritage resources. Generally, building heights in Old Town, St. Davids, and Queenston do not exceed ten (10) metres. This lowrise character will be maintained, and the implementing zoning bylaw will limit building height accordingly. Special provisions may be included in the zoning by-law limiting the building height to less than ten (10) metres in residential areas where the majority of the buildings are 1 or 1.5 storeys in height. [...]*

ANALYSIS

The proposed development aligns with Policy 3.7.1.1 of the Town's Draft OP, which acknowledges that a degree of change is expected within existing neighbourhoods over time. Such change must be appropriate and compatible with the existing character of the area. The proposed museum additions are modest in scale and sensitively located primarily to the rear of the Subject Lands, ensuring minimal impact on the surrounding residential context and the existing streetscape, respectively.

In accordance with Policy 3.7.2.1, redevelopment must be compatible with both the Subject Lands and the surrounding neighbourhood, with consideration given to the following criteria:

- a. **Conservation of Natural and Built Heritage Resources:** 43 Castlereagh Street is designated under section 29 Part IV of the *Ontario Heritage Act*, and its heritage attributes will be conserved. An *Ontario Heritage Act* permit application will be submitted for the proposed connection in accordance with *Ontario Heritage Act* requirements at a later stage, ensuring compliance with heritage conservation requirements.
- b. **Existing and/or Planned Densities:** The proposed building additions enhances the museum's functionality without introducing new residential or commercial uses.
- c. **Lot Frontages, Area, and Depth:** The Subject Lands include 43 Castlereagh Street, which has historically been one of the larger properties on the block. The proposed merger with 25 Castlereagh Street property results in an increase of 1056.45 square metres in lot area and 21.34 metres in lot frontage. The properties have merged on title. The existing buildings on both properties will be conserved. This approach supports the visual character of the existing streetscape. The increased lot frontage and area will not disrupt the established character of the neighbourhood, as the additions are located at the rear (north) of Memorial Hall and designed to connect to the adjacent building at 25 Castlereagh Street. The building additions will remain secondary and subordinate to the existing buildings on the Subject Lands. Details of the building design will be subject to further review through the *Ontario Heritage Act* permit and Site Plan Approval process. A detailed assessment of potential impacts on heritage attributes, along with mitigation measures, is provided in **Appendix 8** of this Report.

- d. Building Setbacks:** The front yard setback remains as existing, preserving the streetscape character and alignment with neighbouring properties. The rear and interior side yard setbacks of the proposed two-storey addition comply with the existing zoning framework for 43 Castlereagh Street, which will be carried forward into the Draft Zoning By-law Amendment. The proposed building addition is adequately separated, minimizes potential impacts on privacy and shadowing, and maintains compatibility with adjacent residential uses. A detailed analysis related to setbacks has been undertaken in Section 6.2 of this Report.
- e. Access:** Access to the integrated museum facility is envisioned from between the existing museum building and the existing building on 25 Castlereagh Street, via a long, wide and barrier-free access ramp. This area is currently used for driveway and parking purposes, as shown in **Photo 3**. Landscaping is proposed to be incorporated, as conceptually demonstrated on the Site Plan Planting (see SK-002 of the Architectural Drawing Package). Pedestrian access to the museum will continue to be provided via the municipal sidewalk along Castlereagh Street, ensuring safe and convenient entry for visitors. There are no parking or loading spaces, nor any associated driveway accesses proposed on the Subject Lands. The location of the proposed building addition at the rear, landscape enhancements, coupled with no parking, loading or driveway access, is anticipated to improve the Castlereagh streetscape. The proposal maintains the pedestrian-oriented nature of the neighbourhood and minimizes potential impacts on adjacent residential uses.
- f. Parking:** No additional parking is proposed as part of this development. The museum currently operates without on-site visitor parking, in accordance with the site-specific zoning provisions. The UrbanTrans' Parking Letter informs that parking demand generated by the proposed development can be accommodated within the existing on-street parking capacity in the immediate vicinity of the Subject Lands. The proposed additions are intended to improve operational efficiency rather than increase visitor capacity. It is anticipated that visitors will continue to rely on active transportation modes and existing on-street parking options.
- g. Servicing, Lot Grading, and Drainage:** The proposed expansion will rely on the existing municipal facilities for water, sewage and stormwater facilities as confirmed in Hallex's FSDB, dated December 16, 2025. Further detailed reports on servicing plans and lot grading will be provided at the Site Plan Approval process.
- h. Existing and/or Planned Height and Massing:** The proposed additions are one and two storeys in height, which is compatible with the surrounding built form, where buildings range from one to two storeys in height.

In accordance with Policy 3.7.2.2, the following design elements have been integrated to ensure that the proposed building addition is compatible with and integrates with surrounding land uses:

- As previously discussed, the museum is a compatible use with the surrounding residential properties given its years of operation in this location.
- Through this application, the existing buildings on the Subject Lands will be conserved. This ensures that majority of the existing massing will remain as is without significantly impacting the streetscape and the surrounding land uses to the north and west of the Subject Lands.
- The proposed building addition is two storeys in height behind the existing two-storey Memorial Hall. The addition connecting to and behind the existing building on 25 Castlereagh Street is one-storey in height. The proposed building heights match the scale of the existing buildings on the Subject Lands which creates an appropriate transition to the abutting residential dwellings along the north and east property lines.
- The proposed building addition at the rear of 43 Castlereagh Street is setback 5 metres from the north property line. This is in compliance with the current site-specific I-54 zone requirements. Additionally, most of the rear yard on 25 Castlereagh Street will remain open and landscaped providing a buffer space between the proposed one-storey addition and the adjacent residential use to the north.

Policy 3.8.2.1 states that building heights in Old Town generally do not exceed 10 metres to conserve the area's small-town character. The proposed building additions are anticipated to be two storeys in height, measuring approximately 11.5 metres, which is higher than the 10-metre provision. A detailed analysis for the proposed building height is discussed in Section 6.2.4 of this Report. The proposal is a low-rise structure, aligning with the policy of maintaining the Town's small-scale setting. The two-storey portion of the proposal has received Site Plan approval from the Town and a heritage permit.

5.5.4 Urban Design

Sections 3.9 of the Town's Draft OP provides the following policies regarding urban design:

POLICY

3.9.1 Objectives

c) Revitalization and redevelopment shall be promoted to enhance the character of existing neighbourhoods.

3.9.2 Policies

a) The Town shall encourage:

ii. well-designed buildings, high quality streetscapes, and attractive public spaces that create neighbourhood character and strengthen community identity and diversity;

iii. the integration of views of built heritage resources and cultural heritage landscapes, landmarks, and significant natural heritage features to enhance a sense of place;

ANALYSIS

The proposed museum additions represent a sensitive form of redevelopment that strengthens the established neighbourhood character, as per Policy 3.9.1 c). The proposal expands the existing museum in a manner that respects the area's residential context, without introducing an incompatible built form or use. The proposal enhances the neighbourhood character through site plan enhancements and landscaping.

Policy 3.9.2 a) ii. encourages new development to be well-designed buildings, high-quality streetscapes, and attractive public spaces that reinforce community identity and diversity. Location and massing of the proposed building additions are contextually appropriate, respecting the existing built form and built heritage of the Subject Lands. Improvements to the pedestrian realm, including enhanced landscaping, and a defined public entrance, support an engaging and accessible streetscape along Castlereagh Street. Details of the building design will be subject to further review through the *Ontario Heritage Act* permit and Site Plan Approval process.

Policy 3.9.2 a) iii. encourages the integration of views of cultural heritage resources to foster a strong sense of place. The Subject Lands include a designated heritage property, which serves as an established cultural landmark within the neighbourhood. The proposed development has been designed to conserve the existing heritage property to reinforce its visibility and prominence within the streetscape and the broader neighbourhood.

5.5.5 Residential Areas

Sections 3.11 of the Town's Draft OP provides the following policies regarding residential areas:

POLICY

3.11. Residential Areas

3.11.1 Background and Identification

3.11.1.1 Residential Areas within the settlement areas are identified on Schedules B2 to B6.

3.11.2 Objectives

3.11.2.1 Objectives for residential development areas are as follows:

e) To support the conservation of built heritage resources and cultural heritage landscapes. This includes, but is not limited to the retention, and possible expansion of, Heritage Conservation Districts and cultural

heritage landscapes in the older residential areas of the Town and the establishment of new heritage conservation districts or cultural heritage landscapes.

3.11.3 Policies

3.11.3.1 Low-rise structures are the predominant built form throughout the residential areas. Medium-rise structures (e.g. multi-floor apartment buildings) may be recognized in specific locations within specific secondary plans, and subject to a zoning by-law amendment. Lowrise structures are generally one (1) or two (2) storeys in height. Medium-rise structures are generally three (3) or four (4) storeys in height, may not require elevators for access to units, and are subject to the restrictions on building height in Section 3.7.2.

3.11.3.4 Any construction of additions or new structures within residential areas will compliment and be compatible with existing adjacent development in terms of its scale, character, height, design and mass.

3.11.3.6 The implementing zoning by-law may use separate zoning categories to limit certain uses where appropriate.

3.11.3.7 Small scale community facilities or convenience commercial uses may be permitted in residential designations with an amendment to the zoning by-law and are subject to the following locational criteria:

- a) Direct or convenient access to an arterial or collector street.*
- b) Design which is compatible with surrounding land uses, maintaining the scale, density and character of the area.*
- c) Provision of adequate buffering and transition to protect surrounding existing development.*
- d) Provision of adequate off-street parking to serve the particular use, while retaining sufficient usable yard space to maintain the existing visual characteristics of the area*
- e) On those streets which have been designated no stopping areas, provision will be made for off-street locations to accommodate drop-off and pick-up of the users of such facilities.*

3.11.4 Established Residential Designation

3.11.4.1 Character:

- a) The Established Residential areas represent older, stable neighbourhoods. These neighbourhoods can include built heritage*

resources and cultural heritage landscapes that must be conserved. The existing character of the Established Residential areas shall be maintained.

3.11.4.2 Permitted Uses:

c) Other uses permitted include:

- *community facilities.*

3.11.4.3 Policies:

a) *Due to the wide variety of lot sizes, frontages, depths and setbacks in the Established Residential designation that result in a varied and attractive streetscape, the Zoning By-law may set requirements on a block-by-block basis to maintain the unique character of the area.*

c) *Within the Established Residential designation, the following policies apply:*

i. *Changes to lot frontage and/or lot depth may be permitted subject to a zoning by-law amendment.*

ii. *In the analysis of any application to amend the zoning by-law proposing changes to lot frontage and/or lot depth, the following will be considered:*

- *The average lot frontage and lot depth of the existing parcels on the block face;*
- *In the case of corner lots, average lot frontages and lot depths will be calculated on both block faces;*
- *The relevant intensification policies of the Official Plan;*
- *Preparation of a streetscape study, planning justification report, and/or heritage impact assessment, if required, which demonstrate that the proposed new lot(s) will maintain or improve the character of the block face;*
- *An arborist report which will consider the potential impacts on all trees with particular regard for Carolinian Canada species; and*
- *Existing and proposed land uses on the subject lands and surrounding lands.*

d) *Built heritage resources and cultural heritage landscapes shall be conserved.*

e) *Development will consider the existing physical character of the neighbourhood, including in particular:*

i. Patterns of streets, blocks and lanes, parks and public building sites;

ii. Size and configuration of lots;

iii. Heights, massing, scale and dwelling type of nearby residential properties;

iv. Prevailing building type(s);

v. Setbacks of buildings from the street or streets;

vi. Prevailing patterns of rear and side yard setbacks and landscaped open space;

vii. Continuation of special landscape or built-form features that contribute to the unique physical character of a neighbourhood; and

viii. Conservation of built heritage resources and cultural heritage landscapes.

ANALYSIS

The Subject Lands are designated Established Residential on Schedule B2 of the Town's Draft OP. This designation primarily accommodates low-rise residential structures which are one to two storeys in height. In accordance with Policy 3.11.3.1, the proposed building additions, being one and two storeys in height, are considered low-rise structures, consistent with the predominant built form within the surrounding residential areas. As the existing buildings on the Subject Lands are proposed to be retained, the massing, setbacks and character along the streets are also conserved. The proposed development maintains a height and massing that align with the established neighbourhood built form, where one- and two-storey buildings are the predominant built forms. Further information regarding architectural detailing and building materials will be reviewed through the future *Ontario Heritage Act* permit application and Site Plan Approval process.

Under Policy 3.11.3.4, development within the Established Residential designation is to be compatible in scale, character, height, design, and massing to adjacent residential uses. The proposed addition achieves this through its low-rise height, maintenance of existing massing and character along the street. Compatibility with the surrounding neighbourhood is discussed in detail in Section 5.4.3 and 5.5.3 of this Report.

Policy 3.11.3.7 permits small-scale community facilities within residential designations, subject to a Zoning By-law Amendment (ZBA). The proposed ZBA will introduce a site-specific Institutional (I-XX) Zone to recognize the merged parcel and facilitate the development as a unified museum facility. The Town's Draft OP carries forward the same locational criteria for community facilities as identified in Policy 15.3.1(3) of the current Town's OP, which the proposed development also satisfies. A detailed analysis of these criteria is provided in Section 5.4.8 of this Report.

Section 3.11.4 provides policies specific to the Established Residential designation. Policy 3.11.4.1 a) emphasizes the conservation of built heritage resources and the maintenance of existing neighbourhood character, which are fulfilled through the retention of the museum building and introducing additions that are secondary and subordinate to the existing heritage attributes of the Subject Lands.

While the merger of 25 and 43 Castlereagh Street has already occurred, the proposed ZBA will address updated lot dimensions, frontage, and depth. These revisions ensure that the Subject Lands continue to align with the policy intent of the Established Residential designation. In accordance with Policy 3.11.4.3 c) (ii), the following considerations apply:

- Intensification policies are not applicable to the proposed development, as the expansion supports an existing community use rather than introducing new residential or commercial density.
- A streetscape study was not requested through the pre-consultation agreement, dated October 02, 2025, however, the proposed additions maintain and enhance the character of the immediate neighbourhood by continuing the established pattern of low-rise buildings with landscaped frontages and pedestrian-oriented built-forms. A detailed analysis of the block face is discussed in the following paragraph.
- The proposed development prioritizes the conservation of existing trees, with the removal of only four (4) trees. The majority of trees on the Subject Lands will be retained, as illustrated on the Tree Inventory, dated December 19, 2025. Notably, there are no Carolinian Canada species inventoried in the enclosed Tree Inventory. A detailed tree protection plan will be finalized at the Site Plan Approval stage, following confirmation of the detailed servicing design.
- The proposed additions do not deviate from the established use of the Subject Lands and are compatible with adjacent residential properties.

In accordance with Policy 3.11.4.3 c)(ii) and Policy 3.11.4.3 e), the physical character of the neighbourhood and block face can be described as follows:

Block Face Calculation

Policy 3.11.4.3 c)(ii) requires analysis of the average lot frontage and lot depth on both block faces for corner lots. The average block face calculations⁹ are outlined in **Table 5** below.

Table 5 – Average Block Face Calculations

ADDRESS	FRONTAGE	DEPTH
LOTS FRONTING CASTLEREAGH STREET		
9 Castlereagh Street	25.7 m	36.5 m
15 Castlereagh Street	20 m	36.2 m
25 and 43 Castlereagh St	82 m	52.6 m
AVERAGE	42.5 m	41.7 m
LOTS FRONTING DAVY STREET		
25 and 43 Castlereagh St	21.8 m (exterior side yard)	42.56 m
287 Davy Street	22.8 m	44.7 m
279 Davy Street	18.6 m	58.5 m
267 Davy Street	18.7 m	58.5 m
263 Davy Street	14.3 m	44.3 m
40 Platoff Street	30.4 m	44.3 m
AVERAGE	21.1 m	48.8 m

Along Castlereagh Street, the Subject Lands have a lot frontage and depth greater than the block average, which is expected given that the lands have historically been one of the larger properties on the block while the adjacent properties are primarily single-

⁹ The values are derived from Niagara Navigator and the Topographical Sketch, prepared by J.D. Barnes Limited, dated September 5th, 2024.

detached dwellings with smaller lot sizes. Along Davy Street, the exterior side yard fronting the street was used for accurate measurement. The average lot frontage and depth are comparable to the overall block average, which supports the proposal's compatibility with the surrounding neighbourhood context.

- i. **Street and Block Patterns:** The Subject Lands are located within a traditional grid street pattern and proximity to several tourist and community uses. The museum, as a recognized cultural facility, contributes to the area's established pattern.
- ii. **Lot Size and Configuration:** The merged parcel results in an irregular rectangular lot that is larger than adjacent residential lots but in proportion for an institutional use. The increased lot size provides sufficient area for museum, the intended programming, and open space.
- iii. **Heights, Massing, Scale and Dwelling Type of Nearby Residential Properties:** Surrounding properties consist primarily of one- and two-storey detached dwellings. The proposed one- and two-storey additions are consistent in height and scale, that minimizes visual mass and integrates well with the existing residential setting.
- iv. **Prevailing building type(s):** The area is predominantly characterized by detached dwellings. The existing building at 25 Castlereagh Street will be retained and maintains a low-rise built form along the abutting streets. The Memorial Hall building (non-residential) on 43 Castlereagh Street has been in place since 1907. Its continued presence helps maintain the established low-rise built form along the abutting streets and the immediate neighbourhood.
- v. **Building Setbacks from the Streets:** There are no changes to the front setbacks from the existing buildings on the Subject Lands, while the proposed additions are located primarily towards the rear. This preserves the visual continuity along Castlereagh and Davy Streets.
- vi. **Rear and Side Yard Setbacks and Landscaped Open Space:** The proposed additions maintain the current side yard setbacks, especially where the proposed connection interfaces with the abutting residential dwelling along the west property line. Approximately 64% of the Subject Lands will be preserved as landscaped open space, providing pervious surfaces for stormwater infiltration and reduce the load on the existing municipal facilities. Preservation of the existing setbacks and the majority of the existing trees, contributes to the area's green character and ensures compatibility with adjoining residential uses.
- vii. **Special Landscape or Built-form Features:** The Subject Lands contribute to the area's unique physical character as an *Ontario Heritage Act* designated heritage property (on the portion of lands municipally known as 43 Castlereagh Street), mature vegetation, and pedestrian-oriented cultural function. The proposed additions will support these features by integrating sensitive building design and landscape enhancements.
- viii. **Conservation of Built Heritage Resources:** The proposal conserves the existing museum building, which is located on the property designated under section 29 Part IV of the *Ontario Heritage Act*. The new additions are located at the rear (north) of Memorial Hall and sensitively connected to the rear of 25 Castlereagh

Street to ensure minimal impact on the property's heritage attributes and the surrounding streetscape. Additionally, archaeological assessments have been completed for the Subject Lands. Archaeological assessments for 43 Castlereagh Street have been reviewed and accepted by MCM confirming that no further archaeological work is required. A Stage 1 Archaeological Assessment, dated December 9, 2025, has been completed for 25 Castlereagh Street by ACC, which recommends requiring a Stage 2 archaeological work. Additionally, ACC and the Museum have requested an expediated review and acceptance letter from the MCM confirming ACC's Stage 1 Archaeological Assessment. This letter is forthcoming and will be provided during the review of the ZBA application. Lastly, an *Ontario Heritage Act* permit approval will be required for the proposed connection. Together, these will ensure that the proposal reflects a commitment to conserving and enhancing the Town's cultural heritage resources.

5.5.6 Community Facilities

The museum is a permitted use in Section 3.15 which speaks to community facilities, relevant policies are discussed below:

POLICY

3.15 Community Facilities

3.15.1 Background and Identification

3.15.1.1 Community facilities are intended to provide for the culture, education, health and welfare of the existing and future residents of the Town.

3.15.1.3 Smaller-scale community facilities may be permitted in appropriate locations in Residential designations.

3.15.2 Objectives

3.15.2.1 The objectives for the Community Facilities designation are as follows:

- a) To provide for appropriately-located parks and community facilities in line with the Town's Parks and Recreation Master Plan that are accessible to the people they serve, while not having an adverse effect on abutting land uses.*
- b) To encourage the location of community facilities at strategic locations with convenient access for residents.*
- c) To recognize the changing needs of the community and the subsequent need for redevelopment of community facilities.*

3.15.2.2 *To ensure the conservation of built heritage resources and cultural heritage landscapes through the process of change.*

3.15.3 Permitted Uses

3.15.3.1 *Community facilities include a full range of uses such as private and public schools, day care facilities, treatments centres and clinics, health care facilities, museums, arts and cultural facilities, community centres, places of worship, government offices, libraries, emergency service facilities, public and private cemeteries, parks, and trails.*

ANALYSIS

Section 3.15 of the Town's Draft OP provides policy direction for community facilities, which are intended to serve the cultural, educational, health, and social needs of residents. The Subject Lands are designated Established Residential and community facilities, more specifically the proposed museum, is a permitted use in that designation under Policy 3.15.3.1 of the Town's Draft OP.

5.5.7 Heritage, Archaeology and Culture

Section 6 of the Town's Draft OP provides the following policies regarding heritage, archaeology and culture.

POLICY

6.1 Built Heritage Resources

7.1.1.1 [the numbering error is as noted in the Town's Draft OP, dated Nov 19, 2025] *Conservation and recognition of the Town's built heritage resources are important for protecting its cultural legacy and for developing a strategy for protecting these resources. Conserving built heritage resources forms an integral part of the Town's planning and decision-making. The Town will use the power and tools provided by legislation, policies and programs, particularly the Ontario Heritage Act, the Planning Act, the Ontario Building Code, the PPS, the Environmental Assessment Act, the Standards and Guidelines for the Conservation of Historic Places in Canada and the Municipal Act in implementing and enforcing the policies of this section.*

Built heritage resources are not renewable resources. Once lost, they are gone forever. These resources can be formally recognized as either individually or as cultural heritage landscapes, through designation under the Ontario Heritage Act or through identification within this Plan. They can also be recognized by Parks Canada or other approval or government bodies.

6.1.1 Identification and Documentation

6.1.1.1 *The Town, through a variety of initiatives, will identify, conserve and protect built heritage resources, including those shown on Schedules D1 to D3, and:*

a) will consult with the Municipal Heritage Committee (MHC) on all matters related to the Town’s built heritage resources in accordance with the direction of the Ontario Heritage Act;

b) identify built heritage resources using recognized methods such as those identified by the Province;

c) maintain a Register of Properties of Cultural Heritage Value or Interest which is accessible to the public and identifies properties designated under Section 29, Section 34.5, Section 41 and 52(1) of the Ontario Heritage Act, or a non-designated property under Section 27(3) of the Ontario Heritage Act (as amended and updated from time to time).

6.1.2 Protection of Built Heritage Resources

6.1.2.1 *Protection, maintenance, adaptive reuse and stabilization of existing heritage attributes and features, as opposed to removal or replacement, will be the core principle for all conservation projects and for all developments that have the potential to impact built heritage resources.*

6.1.2.2 *To protect heritage resources, the Town will establish policies and procedures to:*

a) Protect and conserve built heritage resources in accordance with the provisions of the Ontario Heritage Act, the Planning Act, the Environmental Protection Act, the Funeral, Burial and Cremations Act, the Municipal Act, the Ontario Building Code, the PPS, the Standards and Guidelines for the Conservation of Historic Places in Canada, the Venice Charter, the Appleton Charter for the Protection and Enhancement of the built environment, and other recognized heritage protocols and standards as applicable. Conservation, maintenance and stabilization of existing built heritage resources must be the first consideration for all properties on or adjacent to built heritage resources.

i. In the event of any conflict between this Plan and Ontario Heritage Act, the Ontario Heritage Act shall prevail.

b) Listing and/or designating an individual property under Part IV (Section 27 and/or 29) of the Ontario Heritage Act; designating a heritage conservation district under Part V of the Ontario Heritage Act, and/or encouraging the Province to designate an individual property under Part IV of the Ontario Heritage Act.

c) Use secondary plans, zoning by-laws, subdivision agreements, site plan control agreements, a community planning permit bylaw, the sign by-law and other municipal controls, to ensure that development on and/or within built heritage resources or adjacent to built heritage resources is designed, sited or regulated Protection, maintenance, adaptive reuse and stabilization of existing heritage attributes and features, This includes but is not limited to:

- i. impacts such as scale, massing, height, building orientation, materials and location relative to the built heritage resource;*
- ii. destruction of any part of any significant heritage attribute or features;*
- iii. alteration that is not sympathetic or is incompatible with the historic fabric and appearance;*
- iv. shadows created that alter the appearance of a heritage attribute or change the viability of a natural feature or planting;*
- v. isolation of a heritage attribute from its surrounding environment, context, or a significant relationship;*
- vi. direct or indirect obstruction of significant views or vistas within or from built and natural features;*
- vii. a change in land use for a more intensive use; and*
- viii. land disturbances such as a change in grade that alters soils, drainage patterns that adversely affect an archaeological resource.*

d) Impose conditions of approval where built heritage resources are to be affected to ensure the continued protection of the resource in accordance with Section of 33 and Section 42 of the Ontario Heritage Act.

e) Require preparation of a heritage impact assessment or heritage conservation plan for any proposed alteration, construction or

development involving, adjacent to a built heritage resource in accordance with Ontario Regulation 385/21.

g) Require a heritage permit for any work to a built heritage resource protected under the Ontario Heritage Act.

h) Require where development or site alteration is proposed on or adjacent to a Part IV Designated property under Section 29 of the Ontario Heritage Act, and where the designation by-law predates 2005, that any application or heritage impact assessment include an updated Statement of Cultural Heritage Value or Interest with a list of heritage attributes that is satisfactory to the Town. The potential impacts of any such development or site alteration must be evaluated against any identified heritage values or heritage attributes.

i) Review applications for development and site alteration on lands containing and adjacent to built heritage resources and require mitigative measures and/or alternative development approaches to conserve the heritage attributes impacted by the development. A Heritage Impact Assessment and/or an archaeological assessment may be required to demonstrate that the built heritage resources will be conserved. Development of lands adjacent to protected heritage properties shall be required to demonstrate that the heritage attributes of the adjacent protected heritage property are conserved through such approaches as appropriate siting of new development, setbacks, urban design and intensity and types of uses.

6.1.2.9 The Town will use zoning by-law provisions as appropriate, to conserve built heritage resources.

6.1.3 Management of Built Heritage Resources

6.1.3.1 The Town will actively manage built heritage resources and will:

b) Encourage a culture of sustainability by promoting retention, retrofitting, adaptive reuse and conservation of built heritage resources in such a way that conserves their heritage attributes and educating the public on the designations and preservation of built heritage resources as an opportunity for property owners to pursue.

c) Encourage excellence in design when considering additions to existing buildings or construction of new buildings and to consider both contemporary and traditional design options. Any addition must be secondary and sympathetic with adjacent built heritage resources, and must ensure that heritage attributes are conserved.

6.4 Archaeological Resources

6.4.3 *Development and site alteration shall not be permitted on lands containing archaeological resources or areas of archaeological potential unless significant archaeological resources have been conserved.*

a) The Town will promote conservation of its archaeological resources in accordance with the Niagara Region Archaeological Management Plan and will:

i. Require an archaeological assessment by a licensed archaeologist, as a result of a proposal or plan for site alteration or development if any portion of the subject property fall within a zone of archaeological potential, as shown on Schedules D1 to D4, or where an archaeological site has been previously registered on the property.

ii. Require an archaeological assessment in compliance with current Provincial requirements, standards and guidelines for consultant archaeologists; and assess the impact of the proposed development on any archaeological resources identified.[...]

iii. Require a provincial compliance review and acceptance letter verifying that an archaeological assessment is compliant with Provincial standards

iv. Require proponents to complete the necessary archaeological assessment and/or site mitigations prior to submitting their planning application. Where this is not possible, archaeological assessment(s) will be required as a condition of any approval or through a holding provision.

6.5 Cultural Facilities

6.5.2 *As the Town continues to grow and evolve, the demand for community access to quality cultural programming, facilities and opportunities for personal cultural expression will increase. The Town will consider opportunities for integrating arts and cultural facilities and programs as an integral part of the Community Design and development process. The Town will also identify a vision for arts and culture that establish priorities and strategies to strengthen the local arts and culture sector, and will:*

b) Recognize the importance of arts and culture in enhancing the livability of Niagara-on-the-Lake’s communities.

d) *Ensure that new arts and culture programs, services and facilities will, where feasible, be:*

i. integrated with new community development;

ii. designed to include flexible spaces suitable for programming various arts and culture programs and local community activities; and

iii. encourage the conservation of built heritage resources and cultural heritage landscapes.

ANALYSIS

As per Schedules D1, D2 and D3 of the Town's Draft OP, part of the Subject Lands are designated under section 29 Part IV of the *Ontario Heritage Act*. Accordingly, the proposed connection will require an *Ontario Heritage Act* permit. Further, the Subject Lands are noted to be within Niagara-on-the-Lake's National Heritage District on Schedules D1, D2 and D3 of the Town's Draft OP. According to ASI's HIA, this "*district has historical and architectural value as a collection of classically-designed buildings constructed following the War of 1812, reflecting the Town's history as a prominent Loyalist colonial town*". The heritage attributes of 43 Castlereagh Street (per Designation By-law No. 1463-84), associated with the recognition of being within Niagara-on-the-Lake's National Heritage District, are listed in **Appendix 8** of this Report.

Per Policy 6.1.2.1, the protection, maintenance, adaptive reuse and stabilization of existing heritage attributes and features are prioritized in the proposed development through the conservation of the existing buildings on 43 Castlereagh Street. The proposed building additions are located at the rear (north) of Memorial Hall and extend westward as a one-storey addition, connecting to the rear of 25 Castlereagh Street. As previously noted, the two-storey addition has received heritage permit approval in 2021 from the Town. The heritage-related impacts and mitigation measures discussed in this Report is in relation to the proposed connection to the rear of Castlereagh Street. The scale and massing of the proposed connection are intended to remain secondary and subordinate to the existing buildings on the Subject Lands. The proposed connection is intended to blend harmoniously with the existing buildings, and detailed design elements will be discussed as part of the required *Ontario Heritage Act* permit application and Site Plan Approval process. An assessment of potential impacts on heritage attributes, along with mitigation measures, is provided in **Appendix 8** of this Report.

The policies of 6.1.2.2 a) require protection and conservation of the built heritage resources in accordance with provincial legislation and guidelines as noted in the policy. It prioritizes the conservation, maintenance and stabilization of the existing built heritage resources for properties on or adjacent to built heritage resources. Accordingly, the proposal to conserve the existing buildings on 43 Castlereagh Street will ensure the continued protection of the built heritage resources. As previously noted, the proposed building additions are to the rear (north) of Memorial Hall and designed to connect to the

adjacent building at 25 Castlereagh Street, and their construction is intended to be in a manner that protects, maintains and stabilizes the existing built heritage resources. A detailed assessment of potential impacts on identified heritage attributes, along with mitigation measures, is provided in **Appendix 8** of this Report.

The following criteria of Policy 6.1.2.2 c) have been analyzed to ensure that development on and/or within built heritage resources or adjacent to built heritage resources is designed, sited or regulated through the ZBA process to be conserved and protected.

- i. The proposed connection has been sensitively massed to complement the existing built heritage resources. The proposed building additions are one- and two-storeys in height, consistent with the scale of the existing buildings on the Subject Lands. The two-storey addition was part of the 2021 Heritage Permit granted by the Town. The proposed connection to the rear of 25 Castlereagh Street is intended to remain secondary and subordinate to the existing buildings on the Subject Lands. Its design is intended to integrate harmoniously with the existing heritage structures, which will be discussed in detail at the future *Ontario Heritage Act* permit stage and the future Site Plan Approval application. As such, the proposed connection is not anticipated to result in significant impacts to the scale, massing, height, building orientation, materials and location relative to the built heritage resource.
- ii. No significant demolition or alteration that will alter the existing heritage attributes or features is proposed as part of this development. As outlined in **Appendix 8** of this Report, all identified heritage attributes will be conserved and maintained through the construction of the proposed expansion.
- iii. As previously noted, the proposed building additions are located to the rear (north) of Memorial Hall and connects to the rear of 25 Castlereagh Street. By conserving the existing buildings on the Subject Lands, the current streetscape will remain largely unaltered. The westward extension from the proposed two-storey addition will be visible from Castlereagh Street in the space between the two existing buildings (Memorial Hall and 25 Castlereagh). This space, is currently used for driveway and parking purposes, as shown in **Photo 3**, and is proposed to be utilized as the main entrance of the integrated museum facility. The addition will be complemented by landscaping improvements (as shown in Site Plan Planting SK-002, of the Architectural Drawing Package), enhancing this portion of the Castlereagh streetscape from its existing condition. The detailed design and selection of materials for the proposed connection will be carefully considered to ensure that the proposed connection is compatible with the heritage attributes of 43 Castlereagh Street through the *Ontario Heritage Act* permit and Site Plan Approval applications. It is noted that the two-storey addition was part of the 2021 Heritage Permit granted by the Town. This also addresses the requirements of Policy 6.1.3.1 c).
- iv. The proposed building additions, measuring one- and two-storeys in height, are consistent with the scale of the existing buildings on the Subject Lands and compatible with the immediate neighbourhood. Shadow impacts resulting from

- the new building extension are expected to be minimal and are not anticipated to alter the appearance of any heritage attributes or change the viability of a natural feature or plantings on the Subject Lands.
- v. The rear placement of the proposed extension ensures that the heritage attributes of the property will not be isolated from the surrounding environment or context. The additions are designed to maintain the existing relationship between the existing museum building and its setting in terms of its design, scale and orientation.
 - vi. The proposed extension is situated to the rear (north) of Memorial Hall and connects to the rear of 25 Castlereagh Street. The proposal recommends enhanced landscaping along the front to highlight the new building entrance. Notably, the new building entrance is set back behind the existing buildings and the mature trees along the Castlereagh Street right-of-way will provide a natural visual barrier, ensuring the proposed connection is largely screened from the streetscape except when viewed directly from the front. The suggested landscaping improvements are not anticipated to cause any direct or indirect obstruction to the heritage attributes of 43 Castlereagh Street, rather an enhancement to the existing streetscape condition. The proposed connection is intended to remain secondary and subordinate to the existing buildings on the Subject Lands.
 - vii. The Subject Lands are currently regulated by two different zoning categories. The proposed rezoning to a site-specific Institutional (I-XX) Zone will facilitate an integrated and expanded museum facility.
 - viii. The completed archaeological assessments for 43 Castlereagh Street have confirmed that the formerly landscaped open spaces have been thoroughly investigated, encountering no archaeological material during their field surveys. A Stage 1 archaeological report has been completed for 25 Castlereagh Street, by ACC and dated December 9, 2025, recommending a Stage 2 assessment for some, but not all, of the lands. This also addresses the requirements of Policy 6.4.3.

As noted above, the Stage 1 Archaeological Assessment has been completed and submitted to MCM for an expedited review and acceptance letter. This letter is forthcoming and will be provided during the review of the ZBA application. The Stage 2 Archaeological Assessment is proposed to be completed in the Spring of 2026.

Policy 6.1.2.2 e) requires the preparation of a Heritage Impact Assessment (HIA) for any proposed alteration, construction or development adjacent to a built heritage resource. As previously noted, NPG received confirmation from Town staff (refer to **Appendix 7** of this Report) that a scoped HIA is not required. Instead, this Report must provide a discussion of the prior heritage approvals for the site and demonstrate how the proposed development satisfies applicable provincial requirements. An analysis has been incorporated throughout this Report, and a scoped impact assessment on the property's heritage attributes is included in **Appendix 8** of this Report. It is noted that the two-storey

addition received *Ontario Heritage Act* approval in 2021 from the Town. An HIA was included as part of the 2021 application (and summarized in Section 3.2.1 of this Report).

In accordance with Policy 6.1.2.2 g), the two-storey addition has received approval, as per the 2021 Heritage Permit granted by the Town. An *Ontario Heritage Act* permit approval will be required for the proposed connection at later stages of the development approval process, where detailed building designs, materials and integration with the existing built heritage resources of the Subject Lands will be discussed. Further, to conform with Policies 6.1.2.2 h) and i), an assessment of potential impacts on the property's heritage attributes, as well as recommended mitigation measures, is provided in **Appendix 8** of this Report. NPG concurs with ASI's HIA recommendations for the two-storey proposed building addition, and the same mitigation techniques could be applied to the construction of the proposed connection with 25 Castlereagh Street.

5.5.8 Tree Preservation

Section 7.7.3 of the Town's Draft OP provides the following policies regarding tree preservation:

POLICY

7.7.3 Tree Preservation

The existing tree canopy in the Town is an important component of the character of the Town and its community design features. Tree preservation and management will be subject to the Region's Woodland Conservation By-law, and the Town's Private Tree Protection By-law, as applicable.

ANALYSIS

The proposed development emphasizes the preservation of existing trees, with only four (4) trees identified for removal as shown on Davey Resource Group's Tree Inventory, dated December 19, 2025. The majority of trees on the Subject Lands will be retained. A detailed tree protection plan will be finalized at the Site Plan Approval stage, following confirmation of the implications of the detailed servicing design.

5.5.9 Infrastructure

Sections 8 of the Town's Draft OP provides the following policies regarding infrastructure:

POLICY

8.1 Transportation

8.1.2 Objectives

8.1.2.1 *The objectives related to the Town's transportation network are:*

d) To minimize any adverse effects of the transportation systems on the natural and man-made environments, especially on established

residential areas, areas of agricultural significance, and to ensure the conservation of built heritage resources and cultural heritage landscapes

8.1.4 Active Transportation

8.1.4.1 The Town recognizes that active transportation is an important element of a sustainable and healthy community and encourages all means of active transportation.

8.1.9 Local Roads

8.1.9.1 Schedule E1 identifies the local roads in the Town.

a) Local roads are intended to provide access to individual properties.

b) The right-of-way width for local roads will be sufficient to accommodate the intended traffic volumes as well as on-street parking. The right-of-way width, the construction of the road and the location of any necessary services will be to the satisfaction of the Town.

c) The minimum required right-of-way width for individual local roads are listed in Schedule E2(i).

d) Design of access to local roads will ensure safety and ease of entry and exit of traffic.

e) Local roads may be subject to specific Community Design and streetscape criteria.

8.1.12 General Transportation Policies

8.1.12.2 Daylighting or sight triangles, according to accepted traffic engineering standards, will be provided wherever possible, at road intersections. The construction of buildings, signs and opaque fences and the planting of trees or high shrubs at the road intersections will be discouraged or prohibited.

8.1.12.4 The development of off-street parking lots is encouraged in appropriate locations in settlement areas. The following provisions apply to off-street parking lots:

c) on-street parking in residential areas may be restricted, and/or prohibited; and

8.1.12.5 Within Old Town in the Queen-Picton Heritage Conservation District, parking lots will not be created by the removal of heritage

sensitive buildings, nor will the parking lots have exposure to Queen and Picton Streets except by signage.

8.1.12.6 On-street parking in residential areas may be restricted and/or prohibited.

8.1.12.7 A cash-in-lieu of parking policy and by-law, as provided for under the Planning Act, may be established to assist in the provision of parking in a planned and orderly manner, while allowing the development or redevelopment of lands in established areas of the Town.

8.1.14 Frontage on a Public Street

8.1.14.1 Development will only be permitted where a lot has frontage onto a public roadway unless specifically permitted elsewhere in the plan.[...]

8.2 Water and Wastewater Services

8.2.1 General Policies

8.2.1.1 New development will be limited by the available capacities of services as determined in consultation with the Niagara Region. With the creation of a municipal servicing plan, within any settlement area boundary, full municipal services are not available, development will be restricted.

8.2.1.4 Land/soil stripping during pre-servicing and servicing activities, as part of new development will not be permitted unless prior written authorization has been received from the municipality. Maintenance of ground cover for both erosion, sedimentation and dust control will be required.

8.2.1.5 Any proposed works for water and wastewater services must ensure the conservation of built heritage resources and cultural heritage landscapes.

8.3 Stormwater Management

8.3.1 Planning for stormwater management will:

- a) minimize, or where possible, prevent increases in contaminant loads;*
- b) minimize changes in water balance and erosion;*
- c) not increase risks to human health and safety and property damage;*

- d) maximize the extent and function of vegetative and pervious surfaces;
- e) provide controls on invasive species including cattails and phragmites;
- f) promote stormwater management best practices, including stormwater attenuation and re-use, and low impact development; and
- g) develop stormwater master plans for serviced settlement areas.

8.3.2 No development will occur without appropriate regard for storm run-off, on-site collection and channeling of stormwater to an adequate outlet. Drainage will be to a storm sewer outlet satisfactory to the Town.

8.3.4 Stormwater management plans shall be prepared in accordance with the Ontario Ministry of the Environment Stormwater Management Planning and Design Manual 2003 or its successor, and with watershed and/or environmental planning studies for the area.

8.3.6 Design of development proposals will incorporate on-site control techniques to minimize peak stormwater flows, and to ensure adequate water quality treatment.

8.3.7 Permanent or temporary sediment retention basins may be required to control quantities of suspended materials washed from the sites.

8.3.9 Development will be permitted only on lands having soil and drainage conditions which are suitable for development and only with appropriate stormwater management and sediment control.

8.3.12 Any proposed works for stormwater management must ensure the conservation of built heritage resources.

8.4 Utilities

8.4.1 All new development will be required to be served by adequate utility networks, that are or will be, established to serve the anticipated development and these networks can be phased in a manner that is cost effective and efficient.

ANALYSIS

According to Policy 8.1.9.1 of the Town's Draft OP, both Castlereagh Street and Davy Street are classified as Local Roads, as shown on Schedule E1. In accordance with Policy 8.1.14.1, development is permitted only on lots that have frontage onto a public roadway.

This requirement is satisfied, as the Subject Lands have frontage on both Castlereagh and Davy Streets.

The Town's Draft OP maintains the same criteria for local roads as outlined in Policy 20.2.4 of the current Town's OP, which the proposed development meets. A detailed analysis of these criteria is provided in Section 5.4.9 of this Report. It is also noted that neither Castlereagh nor Davy Street is listed in Schedule E2(i) – Road Right-of-Way Municipal Sections.

The Town's Draft OP also carries forward the General Transportation Policies from Policy 20.3 (3) and (5) of the current OP, which the proposed development satisfies. These policies emphasize daylight triangle and off-street parking requirements that could negatively impact the character of Old Town. A detailed review of these policies is also included in Section 5.4.9 of this Report.

With respect to Water and Wastewater Services, the Town's Draft OP includes the same relevant provisions of Policy 6.30 (1) of the current Town's OP. The proposed development complies with these servicing requirements, as detailed in Section 5.4.5 of this Report. Additionally, to comply with Policy 8.2.1.5, there are no impacts anticipated on the built heritage resources on the Subject Lands arising from the servicing plans as outlined in Hallex's FSDB.

In response to Policy 8.3.1, 8.3.6 and 8.3.7, Hallex's FSDB recommends implementing stormwater quantity and quality controls to minimize runoff volume and reduce contaminant loads entering the municipal facilities. Policy 8.3.1 d) and f) supports vegetative and pervious surfaces to manage stormwater. Accordingly, approximately 64% of the Subject Lands will remain as landscaped open space, providing pervious surfaces that promote natural infiltration and groundwater recharge. This design approach will reduce stormwater discharge to municipal facilities, alleviating pressure on existing infrastructure and supporting sustainable water management practices.

The Town's Draft OP carries forward the stormwater management policies from Policy 6.30 (4) of the current Town's OP, reflected in Policies 8.3.2, 8.3.6, 8.3.7, and 8.3.9 of the Draft OP. The proposed development satisfies these policies, as outlined in Section 5.4.5 of this Report.

5.5.10 Implementation and Administration

Sections 9 of the Town's Draft OP provides the following policies regarding implementation and administration:

POLICY

9.5 Site Plan Approval

9.5.1 All areas of the Town are designated as proposed Site Plan Control areas under the provisions of Section 41 of the Planning Act. Specific uses subject to site plan control and exceptions to site plan control will be identified in the Town's Site Plan Control By-law.

9.5.2 *Where development consists of properties designated under Part IV and/or Part V of the Ontario Heritage Act, site plan control may apply for new buildings and structures.*

9.5.6 *As part of the site plan approval process, the Town will encourage an architectural review, which may include a review of the exterior design, character, scale, colour, building materials and design features of buildings as well as the impact on any of the heritage attributes and landscape features.*

9.5.9 *The Town shall encourage a high standard of design be applied and that the proponent may be subject to an Urban Design Review Panel and/or the Municipal Heritage Committee, to the satisfaction of the Town.*

9.16 Non-Conforming Uses

9.16.4 *Where a property contains a non-complying use the use may expand in accordance with the following:*

- a) The expansion will not seriously jeopardize the possibility of future developments in their vicinity that may comply more closely with intent of this Plan;*
- b) In any such expansion special efforts are made to enhance the compatibility of the uses and to improve amenity and design; more specifically, matters dealing with buffering, landscaping, parking and vehicular circulation will be given attention;*
- c) The expansion or redevelopment is only permitted through an amendment to a zoning by-law; and*
- d) The expansion must not supersede settlement area boundaries or involve a major intensification of land use.*

ANALYSIS

43 Castlereagh Street is designated under section 29 Part IV of the *Ontario Heritage Act*. A site plan approval is not required because of this designation. However, per Section 41(1) of the *Planning Act*, the proposed alterations “*has the effect of substantially increasing the size or usability*”, which triggers the site plan control process. As such, the intent of Section 9.5 of the Town’s Draft OP will be met even though it’s not currently in force and in effect. A site plan application will be submitted as part of the Town’s approval process.

The Draft OP carries forward the Policy 9.16.4 from Policy 6.20 (4) of the current OP, which the proposed development satisfies. These policies assess expansion of non-complying use. A detailed review of these policies is also included in Section 5.4.3 of this Report.

SUMMARY

Based on the foregoing, the proposed Application conforms to the relevant policies of the Town's Draft OP by contributing to a complete community, contributing to the Town's local economy and tourism sector, maintaining the pedestrian-oriented character of Old Town, ensuring compatibility with adjacent uses, conserving built heritage resources and archaeological resources, and utilizing existing municipal services.

6.0 Proposed Zoning By-law Amendment

The Subject Lands are presently zoned in part “Institutional – 54 (I-54) Zone” and in part, Established Residential (ER) Zone, in accordance with Zoning By-law No. 4316-09 (see **Appendix 5 – Zoning By-law Map**). The previously approved Minor Variance application (File No.: A-01/25), permits the structure at 25 Castlereagh Street to function as office space for the museum. The Zoning By-law Amendment is being undertaken to facilitate the proposed development and to rezone the Subject Lands from the existing dual zoning to a site-specific I-XX Zone.

The Zoning By-law Amendment proposes the following:

- Provide relief related to maximum lot coverage, interior side yard setback, maximum building height, buffer strip, permitted yard projection and encroachment.
- Recognize existing conditions related to minimum front yard setback, exterior side yard setback.
- Address deficiencies related to loading and parking spaces, including accessible parking spaces.
- Carry forward existing site-specific provisions for 43 Castlereagh Street, as appropriate.

The following comprehensive zoning table reviews the proposal against the relevant sections of the Zoning By-law to determine compliance with these requirements:

- **Section 6** – General Provisions
- **Section 7.10** – Institutional (I) Zone
- **Section 7.14.54** – site-specific I-54 Zone (for 43 Castlereagh Street)

A Draft Zoning By-law Amendment has been prepared (see **Appendix 6 – Draft Zoning By-law Amendment**).

6.1 Comprehensive Zoning Review

Table 6 – Zoning By-law 4316-09 Zoning Compliance Review

PROVISION	REQUIREMENT	PROPOSED	COMPLY
SECTION 7. - OLD TOWN COMMUNITY ZONING DISTRICT (Section 7.10 Institutional (I) Zone & 7.14.54 Site-Specific I-54 Zone)			
Permitted Uses (7.10.1)	(j) museum	museum	Yes
Minimum lot frontage	36.5 m	81.99 m	Yes
Minimum lot area	1387 m ²	2,751.55 m ²	Yes
Maximum lot coverage	15%	32% 869.94 m ² (GFA Ground Total)/ 2,751.55 m ² (lot area)	No
	39% (for 43 Castlereagh St, Section 7.14.54.1)		
Minimum landscaped open space	20%	64% (1782.08 m ²)	Yes
Minimum front yard setback	15.0 m	10.19 m, from 25 Castlereagh St (as existing)	No
	3.3 m (for 43 Castlereagh St, Section 7.14.54.1)	3.4 m (as existing)	Yes (carry forward to Draft ZBA)
Minimum interior side yard setback	3.0 m	5.9 m (as existing, along the west property line)	Yes
	3.0 m & 1.8 m (for 43 Castlereagh St, Section 7.14.54.1)	1.8 m (along proposed two-storey addition and east property line)	Yes (carry forward to Draft ZBA)

PROVISION	REQUIREMENT	PROPOSED	COMPLY
		<i>(Note: The 3.0 m setback between Memorial Hall and the west property line is not applicable due to the merging of the properties.)</i>	
	0 m for the existing building (for 43 Castlereagh St, Section 7.14.54.1)	0 m (as existing)	Yes (carry forward to Draft ZBA)
Minimum exterior side yard setback	9.0 m	N/A for 25 Castlereagh	N/A
	6.61 m (for 43 Castlereagh St, Section 7.14.54.1)	6.64 m (as existing)	Yes (carry forward to Draft ZBA)
Minimum rear yard setback	7.5 m	23.42 m	Yes
	5 m & 0 m (for 43 Castlereagh St, Section 7.14.54.1)	5.0 m (along proposed two-storey addition and north property line)	Yes (carry forward to Draft ZBA)
Minimum and maximum building height	10.5 m	11.5 m	No
Minimum accessory building yards setback	1.2 m	N/A	N/A
Minimum accessory building exterior	4.5 m	N/A	N/A

PROVISION	REQUIREMENT	PROPOSED	COMPLY
side yard setback			
Buffer Strip (7.10.3)	Where the interior side yard or rear lot line of a lot zoned Institutional (I) abuts a residential zone, a strip of land adjacent to the adjoining lot line being a minimum of 3.0 m in width shall be used as a buffer strip in accordance with Section 6.6.	No buffer strip	No
	A 3.0 m wide buffer strip adjacent to a residential zone is not required (for 43 Castlereagh St, Section 7.14.54.1)	No buffer strip	Yes (carry forward to Draft ZBA)
SECTION 6. GENERAL PROVISIONS			
Accessory Buildings And Structures (6.1)	(f) Within an urban boundary, all operating apparatus shall be permitted in the front yard, exterior side yard and rear yards only and be appropriately screened and buffered.	Mechanical equipment, contained within an enclosure, is located at the rear of the proposed two-storey addition	Yes
Buffer Strip (6.6)	(a) Where a buffer strip is required in any zone, it shall be of a minimum width and height as specified in the provisions of that zone;	Noted above.	Noted above.
	(b) A buffer strip shall be located within the zone for which it is required. It shall be planted, nurtured and maintained by the owner of the lot on which the buffer strip is located and the replacement of trees and plants shall be made when such plants have died or been removed; and	Noted	Noted.
	(c) A buffer strip may form part of any required landscaped open space.		

PROVISION	REQUIREMENT	PROPOSED	COMPLY
Building Reconstruction, Renovation And Restoration [Designated Buildings] (6.8)	Nothing in this By-law shall prevent the reconstruction, renovation, repair or restoration of a designated building or structure as designated under Part IV or Part V of the Ontario Heritage Act that is a non-conforming use or a non-complying building.	Noted	Yes
Fencing (6.17)	Where a fence is constructed, the height and location will be determined as regulated in the Town’s Fence By-law, as revised from time to time.	Noted for review at Site Plan Approval stage	N/A at this stage.
Garbage And Refuse Storage (6.19)	No garbage or refuse shall be stored on any lot in any Enterprise, Commercial, Industrial or Institutional Zone except within the principal building or an accessory building or structure on such lot, or in a container in the interior or exterior side yard or rear yard of such lot in accordance with the following: (a) A garbage and refuse storage area, including any garbage loading or unloading area, which is visible from an adjoining residential land use or from a public open space, the Niagara River or from a public street, other than a lane, shall have a visual screen; and (b) A dumpster or garbage container shall be regulated in the same manner as an accessory building or structure in the zone in which it is located.	Noted	Yes
Landscape Open	Landscaped open space shall be provided in accordance with the provision set out in each zone	Noted.	Noted

PROVISION	REQUIREMENT	PROPOSED	COMPLY
Space (6.25)	category and in accordance with the following:		
	(a) Any part of a lot which is not occupied by buildings, structures, parking area, loading spaces, driveways, excavations, agricultural uses or permitted outdoor storage areas, shall be maintained as landscaped open space;	Noted.	Noted
	(b) Except as otherwise specifically provided herein, no part of any required front yard or required exterior side yard shall be used for any purpose other than landscaped open space;	Noted.	Noted
	(c) Where landscaped open space of any kind, including a buffer strip is required adjacent to any lot line or elsewhere on a lot, nothing in this By-law shall apply to prevent such landscaped open space from being traversed by pedestrian walkways or permitted driveways;	Noted. Pedestrian walkway connection from the municipal sidewalk to the new main entrance is provided along the south lot line.	Noted, and addressed.
	(d) No part of any driveway, parking area, loading space, stoop, roof top terrace, balcony, other than a landscaped area above an underground parking area, shall be considered part of the landscaped open space; and	N/A	N/A
Lighting (6.26)	No person shall alter, enlarge, erect, renovate or use an outside light fixture in any zone except in compliance with the regulations of any By-law of the Town regulating lights and lighting, and in compliance with the following regulations:	Noted and will be reviewed at Site Plan Approval stage.	N/A at this stage.

PROVISION	REQUIREMENT	PROPOSED	COMPLY
	<p>(a) Flashing lights are prohibited, with the exception of stop signs;</p> <p>(b) Lights and lighting shall not be altered, enlarged, erected, renovated or used in such a way as to be confused with or interfere with traffic lights or otherwise be hazardous to traffic;</p> <p>(c) Lights and lighting shall not be altered, enlarged, erected, renovated or used in such a way as to be confused with or interfere with traffic lights or otherwise be hazardous to traffic;</p>		
Loading Space (6.27)	For a non-residential Building GFA of 2030.91 m ² , 2 loading spaces are required.	0 spaces	No
	(h) Where a building or structure has insufficient loading spaces on the date of passing of this By-law, this By-law shall not be interpreted to require that the deficiency be made up prior to the construction of any addition or a change of use, provided that any additional spaces required by this By-law for such addition or change of use are in accordance with all provisions respecting loading;		
	0 spaces(for 43 Castlereagh St, Section 7.14.54.1)		Yes (carry forward to Draft ZBA)
Lot Development Requirements (6.28)	Nothing in this By-law shall apply to prevent the erection or use for a purpose prohibited by this By-law of any building or structure for which a permit has been issued under Section 5 of the <i>Building Code Act</i> , prior to the day of the passing of this By-law, so long as the building or structure when erected is used and continues to be used for the purpose for which it	Noted, a building permit will be pursued at a later stage.	Yes

PROVISION	REQUIREMENT	PROPOSED	COMPLY
	was erected and provided the permit has not been revoked under Section 6 of the <i>Building Code Act</i> .		
Non-Complying Lots, Buildings, Or Structures (6.33)	(a) Nothing in this By-law shall apply to prevent the continued existence of a lot, building, or structure which complied to the applicable regulations and general provisions when the lot was created or the building or structure constructed so long as any changes to the lot, building or structure comply with the regulations and general provisions of this By-law;	Noted, and addressed through this application.	Yes
	(b) No building or structure shall be built upon any lot unless that lot abuts a street or on an existing lot that fronts on a Firelane;	Subject Lands have frontage on Castlereagh Street and Davy Street	Yes
Parking Requirements (6.38)	<p>No lot shall be used or developed and no building or structure shall be altered, enlarged, erected, renovated or used in any zone unless off-street parking areas are provided and maintained in accordance with the following regulations, unless otherwise provided for in this By-law:</p> <p>(a) Off-street parking areas shall be located on the same lot as the use requiring the parking unless otherwise provided for in this By-law, and shall not infringe on any required loading spaces;</p> <p>(c) Despite any provisions of this By-law, uncovered surface parking areas shall be permitted as required in the specific zone categories;</p>	Noted and addressed through this application.	Noted, see below.

PROVISION	REQUIREMENT	PROPOSED	COMPLY
	(i) Any parking area or access driveway provided in the front yard or exterior side yard of a lot in a non-residential zone, or in any yard of a non-residential use adjacent to a residential use, shall be paved with asphalt, concrete or paving stones. [...] Drainage shall be provided so as to prevent the flow of surface water onto adjacent lots;		
Parking Space Dimensions (Table 6-3)	2.75 x 6.0 m	N/A	N/A
Parking Space Requirements (6.39)	<p>Office: 1 per 28 m² GFLA</p> <p>Conference Rooms or Areas Used in Conjunction with Other Uses Herein: 1 per 18.5 m² GFLA</p> <p>Museum: 1 per 50 m² GFLA</p> <p>Other place of assembly: 1 per 8 seats or 1 per 18.5 m² GFLA used for a hall, auditorium use involving the assembly of persons, whichever is greater</p> <p>Required: 13 spaces</p> <p>0 spaces (for 43 Castlereagh St, Section 7.14.54.1)</p>	0 spaces	No
Parking Space Requirements, Additional Provisions (6.40)	(b) Where a building or structure has insufficient parking spaces on the date of passing of this By-law to comply to the requirements of this By-law, this By-law shall not be interpreted to require that the deficiency be made up prior to the construction of any addition or a change of use provided, however, in the event that any additional	Noted and addressed above.	Noted above.

PROVISION	REQUIREMENT	PROPOSED	COMPLY
	spaces required by this By-law for such addition or change of use, these shall be provided in accordance with all provisions respecting parking spaces and areas;		
	(d) Where parking areas are illuminated, lighting fixtures shall be designed and installed to direct light downward, with deflection away from adjacent lots;	N/A	N/A
	(i) Notwithstanding the yard and setback provisions of this By-law, uncovered surface parking areas shall be permitted in the required yards in the area between the road or street line and the required setback, provided that no part of any parking area, other than a driveway, is located closer than 2 m (6.56 ft) to any front or exterior lot line, and no closer than 1 m (3.28 ft) to any rear or interior side lot line. The minimum front and exterior side yard setback for a bus parking area is 3.0 m (9.84 ft), and 2 m (6.56 ft) to an interior or rear yard. The 2 m (6.56 ft) front yard setback for a parking space shall not be required for residential use, except an apartment building.	N/A	N/A
	(j) A driveway shall be setback a minimum of 8.0 m from an exterior property line and 1.0 m from an interior property line.	N/A	N/A
Parking, Accessible Space Requirements (6.42)	For total required regular parking spaces between 1-25, the required number of accessible parking spaces is 1.	0 spaces	No
	(b) The number of required accessible parking spaces shall be included in the total number of	Noted.	Noted.

PROVISION	REQUIREMENT	PROPOSED	COMPLY
	required parking spaces for the site;		
Permitted Yard Projections and Encroachments (6.44)	Unenclosed porches are permitted to encroach 1.5 m into the front yard	0 m	No
	Unenclosed and uncovered steps are permitted to encroach 1.5 m into the rear yard and 0.6 m into the side yard.	A 0.46-metre-high basement projection encroaches 1.8 m into the eastern interior side yard.	No
		The existing front porch and ramp encroaches 5.19 m into the front yard.	No
Public Street Frontages Required (6.45)	(a) No person shall erect, alter or enlarge any building or structure for permanent use unless the lot upon which such building or structure is to be erected has lot frontage on a street which has been assumed by the Town, Regional Municipality of Niagara, or the Niagara Parks Commission and is maintained in such a manner so as to permit its use by vehicular traffic, except as otherwise specifically permitted in this By-law.	Subject Lands have frontage on Castlereagh Street	Yes
Sight Triangle (6.52)	On a corner lot within the sight triangle, no hedge, shrub, tree, ornamental structure, statue or fence shall be planted, maintained or erected which will obstruct the vision of, or cause safety concerns regarding vehicular traffic.	Noted, there are no proposed landscaping or fencing illustrated on Site Plan Planting (refer to Drawing No. SK-002 of the Architectural Set)	Yes

6.2 Zoning Justification

6.2.1 Maximum Lot Coverage

Proposed: 32%

Required: 15%

The Site Plan, dated December 12, 2025, provides a detailed breakdown of floor areas for the proposed and existing buildings on the Subject Lands, as follows:

Table 7 – Floor Area Breakdown

LOCATION	FLOOR AREA
Existing buildings on 43 Castlereagh St	481.62 m ² (High School Building: 218.74 m ² + Link Building: 93.97 m ² + Memorial Hall 168.91 m ²)
Existing building on 25 Castlereagh St	84.08 m ²
Proposed building addition on the Subject Lands	304.23 m ² (Addition Phase 1: 187.34 m ² + Addition Phase 2: 84.08 m ² + Addition Phase 3: 32.81 m ²)

When combined, the overall lot coverage for the Subject Lands is calculated at 32%, compared to the required 15%. While this is an increase, it is considered appropriate for the following reasons:

- Based on the existing zoning requirements, the maximum permitted coverage for 43 Castlereagh Street is 661.08 square metres (39% of 1,695.10 square metres, per Section 7.14.54.1 of the Town’s Zoning By-law) and for 25 Castlereagh Street is 348.62 m² (33% of 1056.45 square metres, per Section 7.1.2 of the Town’s Zoning By-law). This results in a maximum permitted coverage of 1,009.70 square metres, whereas the proposed coverage is 869.94 square metres, which is below the maximum allowed under the current zoning framework. The proposed ZBA application will consolidate the existing dual zoning to a site-specific I-XX Zone.
- The floor area breakdown demonstrates that the existing buildings continues to account for the bulk of the lot coverage. The proposed building addition is secondary and subordinate to the established built form on the Subject Lands.
- The increase in floor area allows for improving the operational and programming needs by building on the existing museum facility and making efficient use of the available land.

6.2.2 Minimum Front Yard Setback

- Proposed:** 10.19 metres (for 25 Castlereagh Street) and 3.3 metres (for 43 Castlereagh Street)
- Required:** 15 metres

The existing building at 25 Castlereagh Street was originally constructed as a dwelling within the Town's Established Residential (ER) Zone, where the minimum front yard requirement was 7.5 metres, and therefore complied at the time of construction. Similarly, the existing buildings on 43 Castlereagh Street complies with the site-specific I-54 Zone requirement of 3.3 metres. The proposed ZBA application will consolidate the existing dual zoning to a site-specific I-XX Zone; the I Zone requires a minimum front yard setback requirement of 15 metres. The proposed reduction is appropriate as the exterior buildings on the Subject Lands remains unchanged, conserving the established streetscape character of the neighbourhood.

It is noted that the existing zoning for 43 Castlereagh Street (I-54 Zone) specifies that the frontage along Castlereagh Street is considered the frontage for zoning purposes. This is based on the Town's Zoning By-law, which identifies the shorter lot line abutting a street as the front lot line in the case of a corner lot. Although, the lot line abutting Davy Street is shorter in this case, we request that the lot line along Castlereagh Street be carried forward and captured in the Draft ZBA to maintain the current frontage.

6.2.3 Minimum Interior Side Yard Setback

- Proposed:** 1.8 metres
- Required:** 3.0 metres

The two-storey portion of the proposed building addition, located within the extent of 43 Castlereagh Street, is a northward extension of Memorial Hall and setback 1.8 metres from the east property line. The existing zoning permits an interior side yard setback of 1.8 metres on 43 Castlereagh Street (I-54 Zone). While the existing zoning permits this reduced setback, the proposed rezoning to I-XX Zone would require a minimum interior side yard setback of 3 metres. The request is to reduce the requirement to 1.8 metres, and is considered appropriate for the following reasons:

- The requested reduced setback reflects the established development pattern and previously approved site-specific permissions. The existing zoning would have permitted the proposed interior side yard setback as-of-right, if the consolidation of the existing dual zoning (through the proposed ZBA) was not pursued.
- The proposed extension does not include windows or door openings, except for an emergency exit, minimizing privacy and overlook concerns for adjacent properties on the east of the Subject Lands.
- The area between the proposed building addition and the east property line will primarily consist of landscaped paving, providing connection between exit stairs and the landscaped open area at the rear of the Subject Lands.

As previously noted, a portion of the existing (High School) building on 43 Castlereagh Street encroaches onto the property to the north. Section 7.14.54.1 (e) includes a 0-metre rear yard setback for the existing building. Based on the definitions of the rear and interior side lot lines, this segment of the property line would be considered a side lot line, accordingly a setback of 0-metre will be carried forward into the Draft ZBA.

LOT LINE, REAR means, in the case of a lot having four or more lot lines, the lot line farthest from and opposite to the front lot line. [...]

LOT LINE, SIDE means a lot line other than a front lot line or a rear lot line.

6.2.4 Maximum Building Height

Proposed: 11.5 metres

Required: 10.5 metres

The proposed two-storey building has been designed to align with the existing height of the Memorial Hall building (see elevation drawings SK-301, included in Architectural Site Package). The existing zoning does not have a site-specific maximum height restriction, making the height of Memorial Hall legal non-complying. Based on this, the height restriction of the Institutional Zone applies. The proposed two-storey building exceeds this requirement by 1 metre. This increase can be considered reasonable and appropriate for the following reasons:

- Matching the proposed addition to Memorial Hall's height supports a cohesive design approach and respects the heritage character of the Subject Lands.
- The proposed building addition is located behind Memorial Hall, with minimal direct impact on the streetscape or public views. The increase in building height is modest and necessary to accommodate the intended programming without compromising the established character of the neighbourhood.
- There are negligible shadowing concerns as the surrounding neighborhood consists primarily of one- and two-storey dwellings.
- The second-floor plans (see SK-102, included in Architectural Site Package) does not include windows or door openings along the northern and eastern elevations, except for an emergency exit, minimizing privacy and overlook concerns for adjacent residential properties.

It is noted that the High School building includes a cupola and a weathervane, which measures higher than the Memorial Hall building height. Section 6.21 of the Zoning By-law permits such ornamental features above the maximum height, provided they do not contain habitable floor space.

6.21 HEIGHT RESTRICTIONS EXCEPTIONS No building or structure shall exceed the height restrictions set out in this By-law for the zone within which such building or structure is located. However, the building

height restriction shall not apply to the following structures except where any part of such structure is situated higher than the maximum height permitted in this By-law contains habitable floor space:

(e) A cupola, parapet or other ornamental structure or device to enclose mechanical equipment;

6.2.5 Buffer Strip Requirement

Proposed: 0 metres

Required: 3 metres

Section 7.10.3 requires a 3-metre buffer strip where the interior side yard and rear lot line of institutionally zoned lands abuts a residential zone. It is noted that the existing site-specific provision does not require a buffer strip for the existing museum building. In the case of 25 Castlereagh, this affects the western and northern lot lines interfacing with the adjoining residentially zoned lands.

Through this application, the request is to remove the buffer strip requirement and is justifiable for the following reasons:

- It is consistent with the existing zoning framework for 43 Castlereagh Street. Historically, the property has functioned as an institutional use without a buffer strip, and this reduced setback has never posed an issue.
- The museum operates with limited staff and visitor volumes in comparison to larger institutional uses such as schools and community centres. Its low-rise height, limited parking demand, and community-oriented programming ensure compatibility within the established residential context, as previously analyzed in this Report.
- There is no change in the existing setbacks to 25 Castlereagh from the western and northern lot lines.
- Landscaping will be addressed through the Site Plan process which is the appropriate process to address landscaping and fencing.

Accordingly, the request is to carry forward the existing provision requiring no buffer strip for the entire Subject Lands into the Draft ZBA.

6.2.6 Loading Space Requirement

Proposed: 0 spaces

Required: 2 spaces

Section 6.27 of the Town's Zoning By-law requires two (2) loading spaces for a non-residential building with a Gross Floor Area (GFA) between 930 square metres - 4645 square metres. As per the Site Plan, dated December 12, 2025, the total GFA of the

proposed development is 2030.91 square metres. The proposed reduction to zero (0) loading spaces is appropriate for the following reasons:

- The current museum facility is subject to a site-specific zone (I-54, Section 7.14.54 of the Town's Zoning By-law), which does not require loading spaces.
- Deliveries and servicing needs are being accommodated through the existing building access without dedicated loading spaces.
- There is no space to accommodate loading areas without altering the front yard landscaping, the established streetscape and view of the heritage attributes of the Subject Lands.

The request is to carry forward the existing provision requiring zero (0) loading spaces into the Draft ZBA.

6.2.7 Parking Space Requirement

Proposed: 0 spaces

Required: 13 regular parking spaces, including 1 accessible space

Section 6.39 of the Town's Zoning By-law requires, as follows:

- Office: 1 per 28 square metres GFLA
- Conference Rooms or Areas Used in Conjunction with Other Uses Herein: 1 per 18.5 square metres GFLA
- Museum: 1 per 50 square metres GFLA
- Other place of assembly: 1 per 8 seats or 1 per 18.5 square metres GFLA used for a hall, auditorium use involving the assembly of persons, whichever is greater

According to Section 5 of the Zoning By-law:

FLOOR AREA, GROSS LEASABLE means the total area of a building for which tenants pay rent and have exclusive occupancy, measured from the centreline of partition walls and exterior face of outside walls and includes all such floor area on a main floor, mezzanine and upper storey in a cellar, as well as the area of an outdoor patio which is used as a secondary use to a restaurant, but does not include:

(a) Any floor area used in common by the tenants of the building such as a mall, aisle or hallway, elevator shaft or lobby, stairwell, any lunchroom or staff room, washroom, boiler room, maintenance room, mechanical, electrical or utility room, and any automobile parking facilities provided within the building; and

(b) Storage area to which the public cannot or does not have access or which is capable of being used for no other purpose than the storage of goods, fixtures and equipment related to an on-site use.

Based on the Architectural Floor Plans prepared by Lynch and Comisso, thirteen (13) parking spaces are required.

Table 8 – Parking Requirement Calculation

Description [Use, Parking rate]	Leasable Floor Area	Required Parking
GROUND FLOOR		
Retail & POS Area	92.39 m ²	0 space (per ZBL s. 7.14.54.1)
Exhibit Space	89.73 m ²	0 space (per ZBL s. 7.14.54.1)
Exhibit Space	154.83 m ²	0 space (per ZBL s. 7.14.54.1)
Multi-purpose Room [Place of Assembly, 1 space per 18.5 m ² GFLA]	119.59 m ²	6.46
Reception & Cloak Room [Museum, 1 space per 50 m ² GFLA]	45.14 m ²	0.90
Conference Room [Museum, 1 space per 50 m ² GFLA]	23.77 m ²	0.48
Research Room [Museum, 1 space per 50 m ² GFLA]	36.95 m ²	0.74
SECOND FLOOR		
Exhibit Space	121.01 m ²	0 space (per ZBL s. 7.14.54.1)
Exhibit Space [Museum, 1 space per 50 m ² GFLA]	120.98 m ²	2.42
Office [Office, 1 space per 28 m ² GFLA]	14.58 m ²	0.52
Office [Office, 1 space per 28 m ² GFLA]	15.17 m ²	0.54
Office [Office, 1 space per 28 m ² GFLA]	12.01 m ²	0.43
TOTAL		12.49 = 13 spaces

The proposed development does not provide any off-site parking spaces, as observed on the Site Plan, dated December 12, 2025. It is noted that the existing museum facility has a site-specific zone (I-54, Section 7.14.54 of the Town’s Zoning Bylaw) that requires no parking. Further, through the Minor Variance application, the proposed office uses were allotted two (2) parking spaces and zero (0) accessible parking spaces, until such time as a ZBA is approved. Through this ZBA application, the request is to reduce the required

parking spaces for the proposed uses to zero (0) on-site parking spaces. This parking deficiency can be supported for the following reasons:

- The Subject Lands are constrained in terms of available space, and the only feasible location for additional on-site parking would be at the front of the existing buildings at 43 Castlereagh Street. Introducing parking in this portion of the Subject Lands would alter the heritage character, disrupt the landscaped front yard and established streetscape of the Subject Lands.
- There are currently nine (9) on-street parking spaces on Castlereagh Street, which are designated by municipal signage for exclusive museum and visitor use. Further, the Town’s Operations Department have advised that these designated museum parking signs will be relocated to fully encompass both properties at 25 and 43 Castlereagh Street, resulting in a total of twelve (12) on-street parking spaces, including one (1) Accessible Parking Space. Based on this, a shortfall of only one (1) parking space is anticipated.
- The proposed building additions are intended to enhance operational efficiency of the museum facility, rather than increase visitor capacity. The parking survey conducted by UrbanTrans, in their Parking Letter, dated December 12, 2025, analyzed peak demand and on-street capacity within approximately 250 metres of the Subject Lands. The analysis confirms that any incremental parking demand generated by the proposed development can be accommodated within the existing on-street parking capacity in the immediate vicinity of the Subject Lands.
- Urban Trans’ Parking Letter mentions that it is common for historical sites and museums, particularly in Niagara-on-the-Lake, to rely primarily on on-street parking rather than dedicated off-street lots, as this approach preserves the historic streetscape, avoids large, paved areas that disrupt architecture, and aligns with municipal policies minimizing off-street parking requirements in conservation zones.
- The proposal maintains the pedestrian-oriented nature of the neighbourhood and minimizes potential impacts on adjacent residential uses. The proposed reduction in parking requirement is also supported by access to Niagara Region Microtransit service, and connection to a sidewalk that is part of a grid-pattern street network all support the use of active transportation. The requested reduction allows for the museum use to operate in a manner that is both functional and respectful of the existing neighbourhood character.

6.2.8 Front Yard Projections and Encroachments

Proposed:	0 metres (for 43 Castlereagh Street); 5.19 metres (for 25 Castlereagh Street)
Required:	1.5 metres into the front yard

For 43 Castlereagh Street, the southern elevation of Memorial Hall consists of an entrance porch that extends until the property line and nearly encroaches into the right-of-way of Castlereagh Street. The Town’s Zoning By-law defines “unenclosed” as,

a space that is open and not enclosed by walls, windows or a combination thereof on at least one (1) side and may or may not be covered.

The existing porch is an open, unenclosed structure consisting of a roof and a raised platform with steps. It was originally designed as an entryway porch for the Memorial Hall building at the time of its construction in 1906.

Section 6.44 of the Town's Zoning By-law lists the permitted yard projections and encroachments and provides an encroachment allowance of 1.5 metres into the front yard. The encroachment is greater than 1.5 metres into the front yard, as observed on the Site Plan, dated December 12, 2025. As this condition is existing and no demolition or alteration is proposed for the southern elevation of Memorial Hall, we request that the variance can be explicitly captured in the Draft ZBA to maintain the current setbacks.

For 25 Castlereagh Street, the southern elevation consists of a front porch that extends 2.7 metres into the front yard. Similar to the above justification, the front porch is an existing, unenclosed structure consisting of a roof and a raised platform with steps. In addition, through this Application, a barrier-free ramp is also proposed, as a connection between the walkway and the western elevation of the front porch. This ramp extends 5.19 metres into the front yard (10.19 metres (front yard setback) – 5 metres (setback of ramp from the front property line)) and requires a variance from the zoning provision. The requested variance is supportable as the ramp will provide a barrier-free access for staff who are the primary users of this building. The ramp is modest in scale and does not obstruct views of the established character of the streetscape. The variance supports inclusive design and is not anticipated to create privacy or other nuisance for the neighbouring properties.

6.2.9 Side Yard Projections and Encroachments

Proposed: 1.8 metres

Required: 0.6 metres into the side yard

At the basement level, a connection to the proposed two-storey addition is provided via the stairwell. This new bridge joining the Link Building and the proposed two-storey addition is located only at the basement level and appears as a 0.46-metre-high projection at ground level and encroaches 1.8 metres into the eastern interior side yard. According to Section 6.44 of the Town's Zoning By-law, only a 0.6-metre projection into the side yard is permitted and the proposal requests a variance from this provision.

The proposed 1.8-metre projection is justifiable for the following reasons:

- The basement projection is located at the rear corner of where the Link Building and the proposed two-storey addition connects.

- The projection is 0.46-metre high and can be comparable to a small platform accessed by approximately two and a half steps.
- Given its rear location, it does not interfere with pedestrian movement or emergency access routes, nor is it visible from the street.
- There are no privacy or shadowing impacts on neighbouring properties.

7.0 Summary and Conclusion

The proposed Zoning By-law Amendment Application implements an integrated museum facility on the Subject Lands, such that it contributes to the Town's local economy and tourism sector, maintains the pedestrian-oriented character and streetscape along Castlereagh Street and Davy Street in Old Town, ensures compatibility with adjacent uses, conserves cultural heritage resources, while utilizing existing municipal services.

It is our opinion that the proposed Zoning By-law Amendment represents good land use planning, is in the public interest, and should be approved for the following reasons:

1. The Application has regard for matters of Provincial interest as identified in the *Planning Act*, is consistent with the Provincial Planning Statement (2024), conforms with the Niagara Official Plan, the Town of Niagara-on-the-Lake Official Plan, and the Town of Niagara-on-the-Lake Draft Official Plan;
2. Land use compatibility between the proposed building additions with the adjacent residential uses is achieved through proposed building height, setbacks, and landscaping treatments. This approach helps conserve the character of the neighbourhood especially in an established community, by avoiding alterations to the current streetscape and increased vehicle activity levels on the Subject Lands. It also promotes walkability and reduced car dependency, in an area serviced by transit and pedestrian infrastructure.
3. The proposed development will facilitate the vision of complete communities within the Town by conserving cultural heritage resources in the Town, supporting the Town's tourism and local economy, and maintaining compatibility with the adjacent residential uses. The proposed development facilitates the efficient use of lands, while utilizing existing municipal infrastructure and making use of the vacant portion of the Subject Lands.
4. The proposal is supported by reports prepared by qualified professionals, subject to relevant recommendations, that confirm the proposed building additions can be municipally serviced and will not adversely impact the parking in the locality.
5. There were no findings of archaeological significance for 43 Castlereagh and the MCM's clearance letter has been received. A Stage 1 Archaeological Assessment has been completed for 25 Castlereagh and MCM has been requested for an expedited review and provision of the acceptance letter. A Stage 2 Archaeological Assessment is proposed to be completed Spring 2026, and a portion of 25 Castlereagh does not require further assessment.
6. The proposal provides for the conservation of majority of the existing tree as confirmed by the project arborist's Tree Inventory.

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Report reviewed and approved by:



Mary Lou Tanner, FCIP, RPP
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Report reviewed and approved by:



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8.0 Appendices

Appendix 1: Conceptual Site Plan

Appendix 2: Niagara Official Plan Schedules

Appendix 3: Town of Niagara-on-the-Lake Official Plan Schedules

Appendix 4: Town of Niagara-on-the-Lake Draft Official Plan Schedules

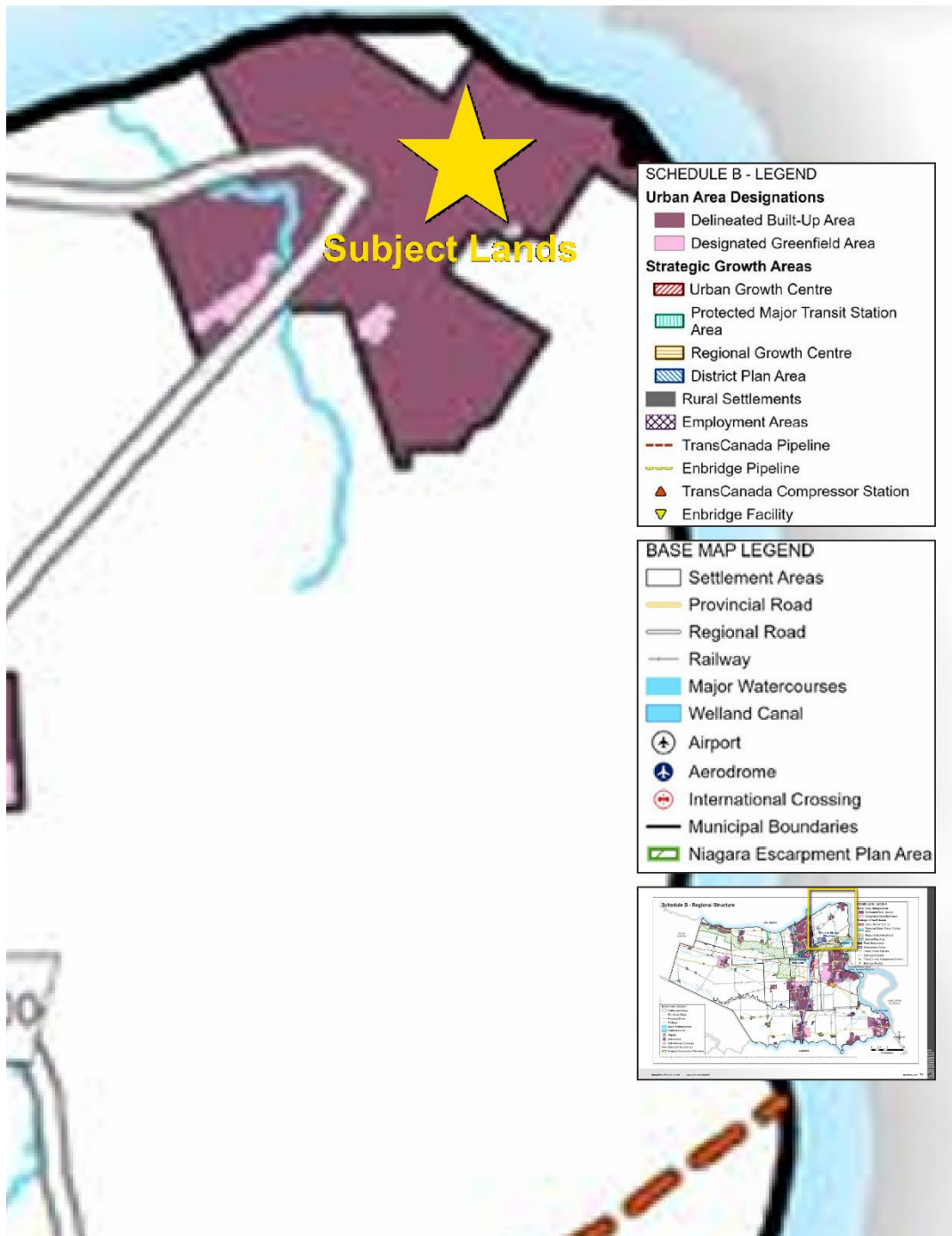
Appendix 5: Town of Niagara-on-the-Lake Zoning By-law Map

Appendix 6: Draft Zoning By-law Amendment

Appendix 7: Correspondence and Confirmation from Staff

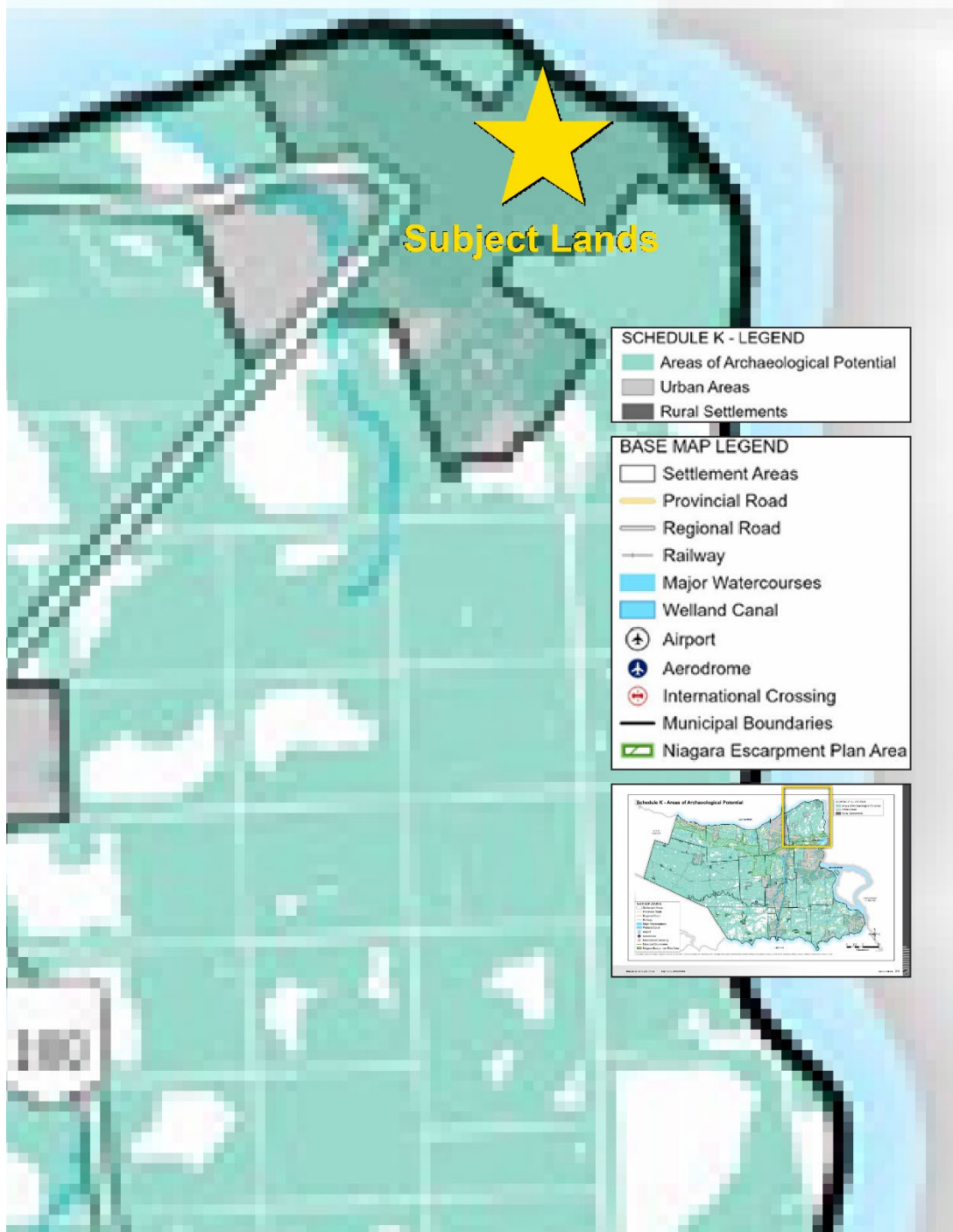
Appendix 8: Heritage Attributes, Impact and Mitigation Assessment Chart

Appendix 2: Niagara Official Plan Schedules



Schedule B – Regional Structure

Schedule J2 – Strategic Cycling Network



Schedule K – Areas of Archaeological Potential

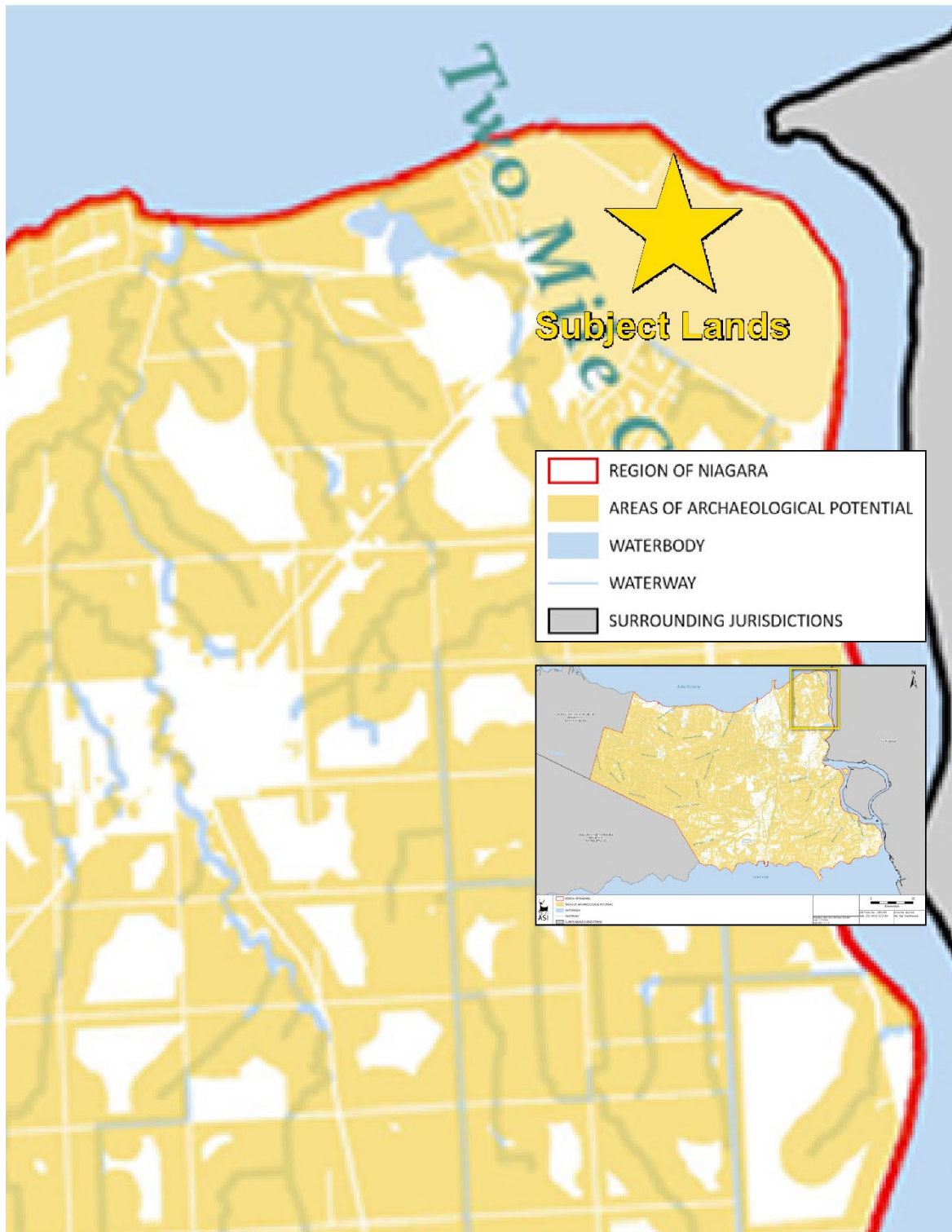


Figure 3: Archaeological Potential Planning Map

Appendix 3: Town of Niagara-on-the-Lake Official Plan Schedules



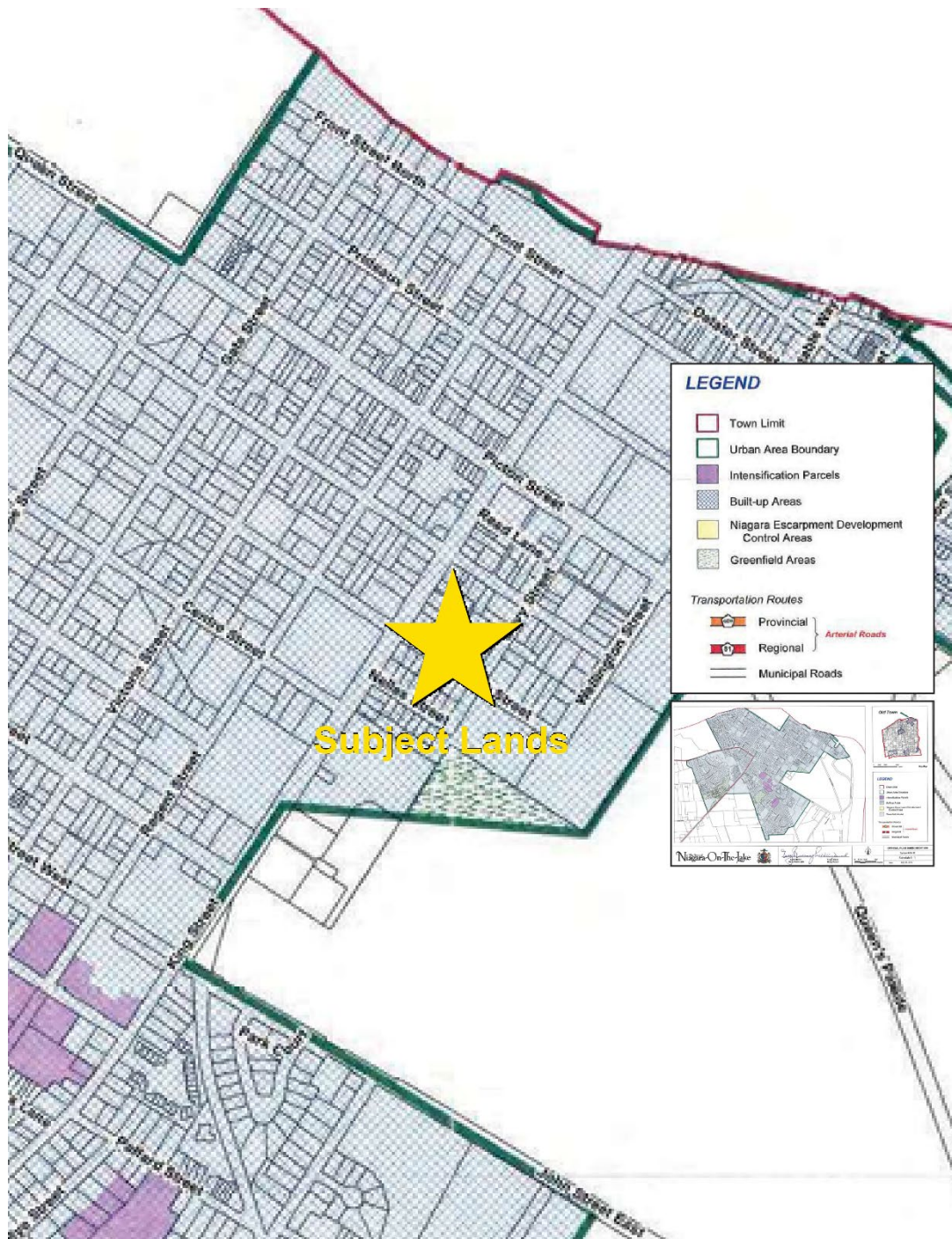
Schedule B – Land Use Plan



Schedule G – Transportation Plan



Schedule H – Archaeological Potential

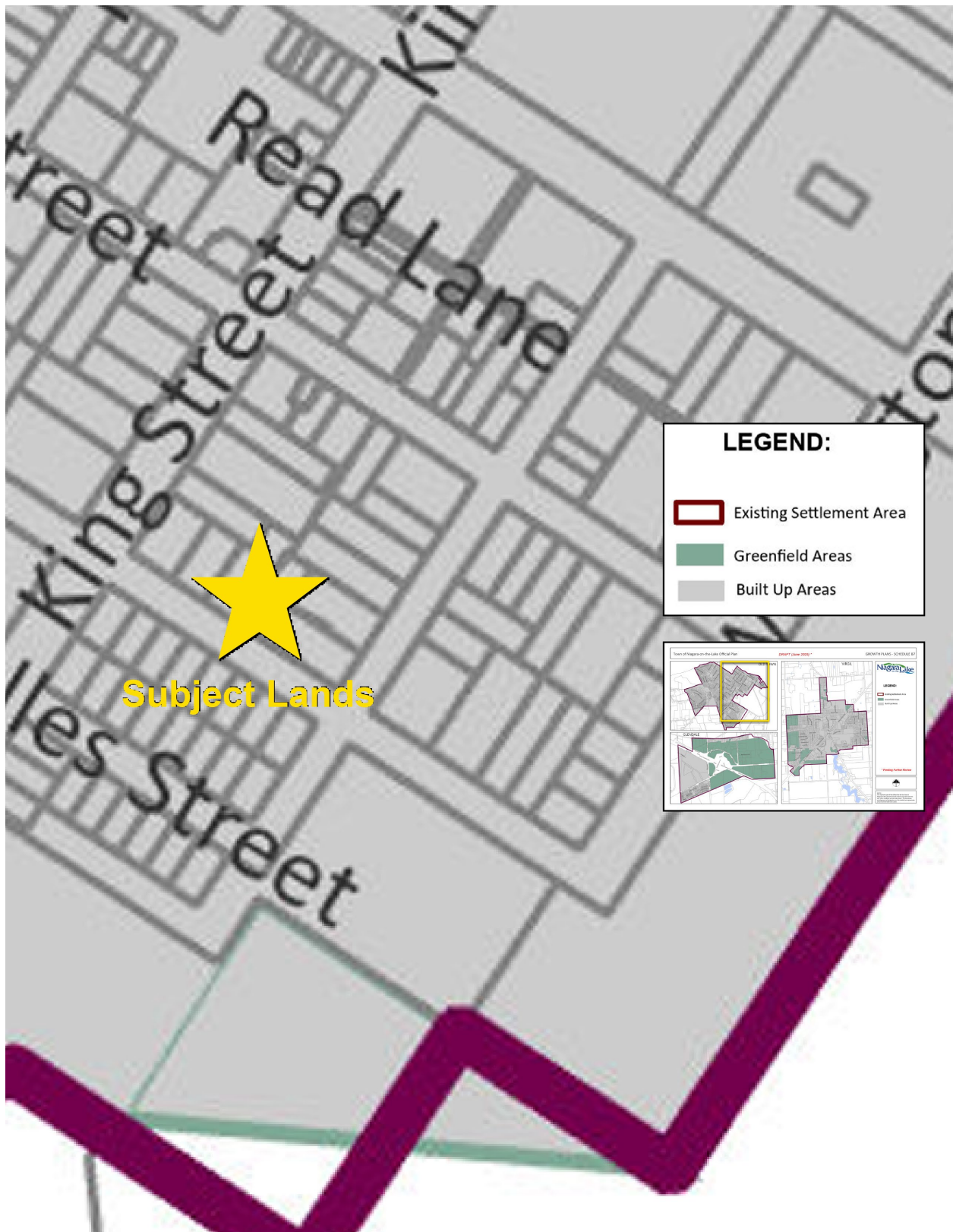


Schedule I1

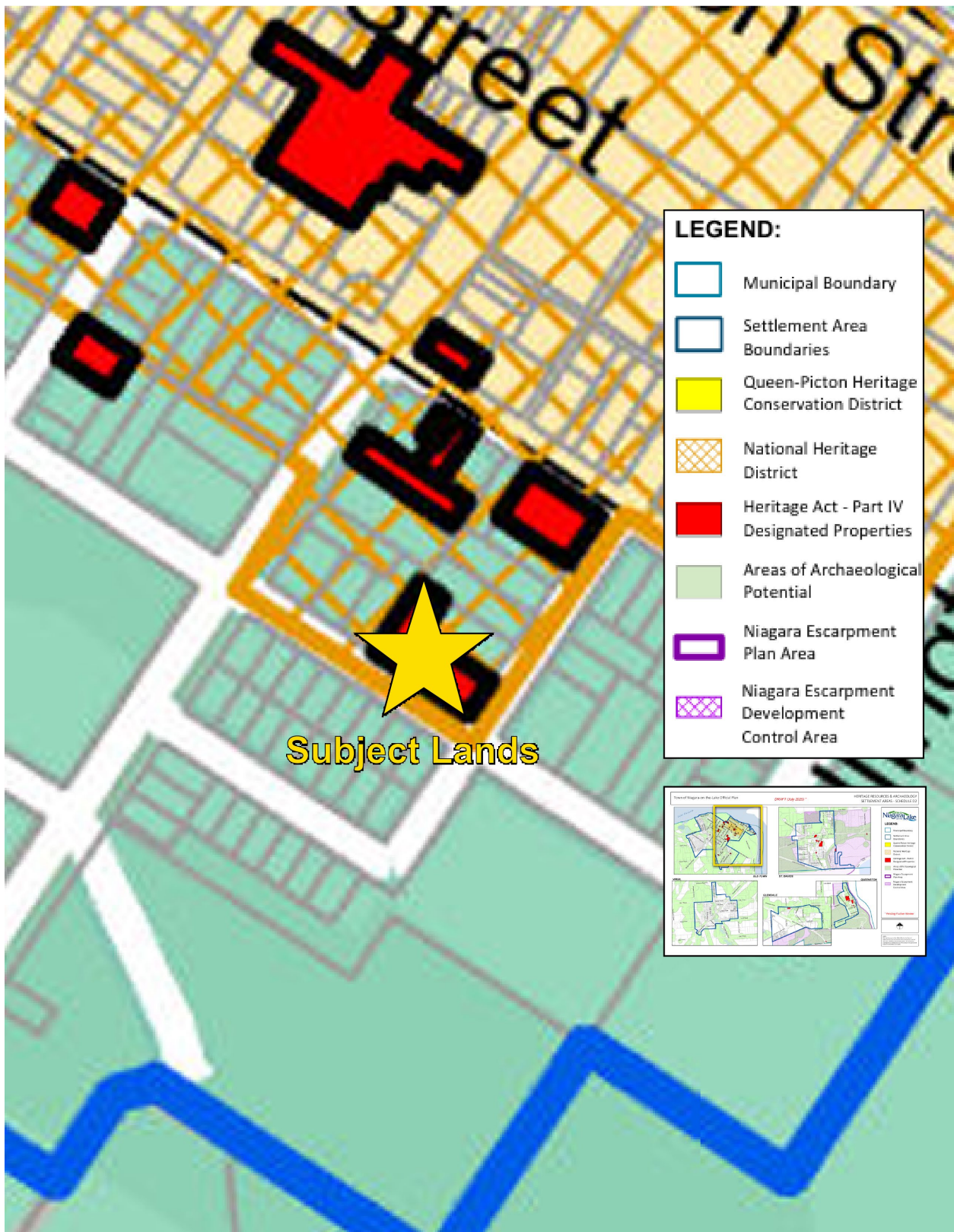
Appendix 4: Town of Niagara-on-the-Lake Official Plan Draft Official Plan Schedules



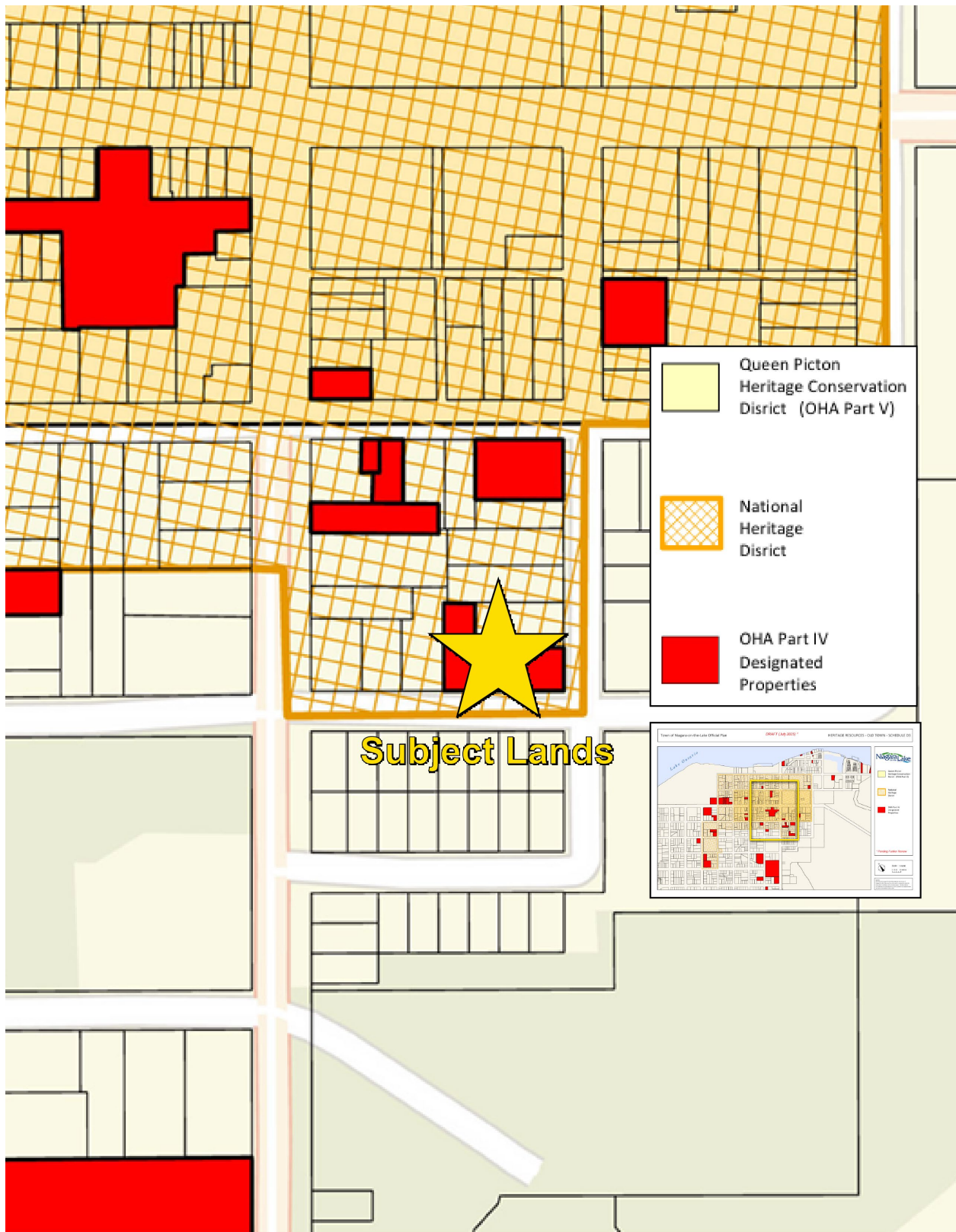
Schedule B2 – Land Use Plan – Old Town



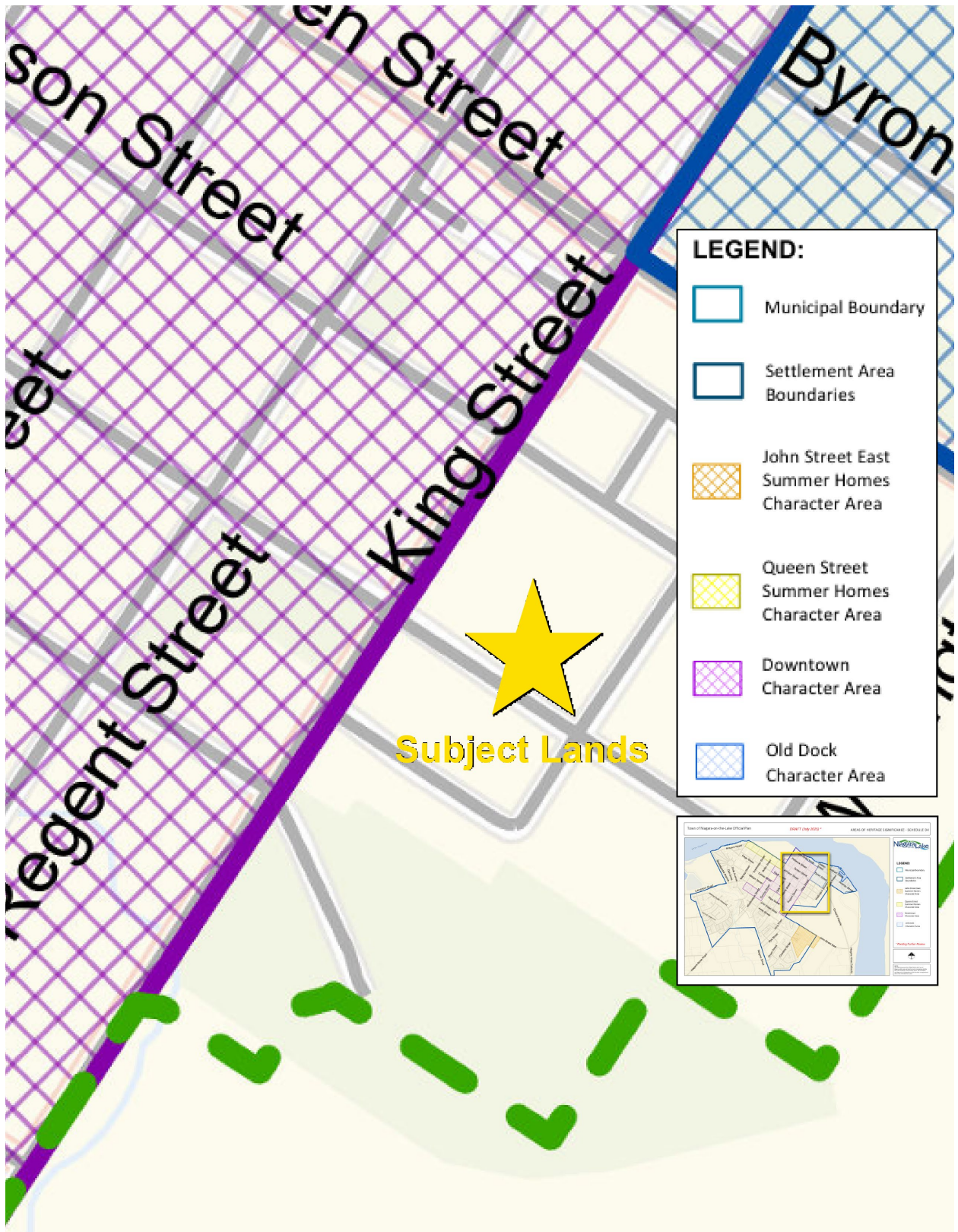
Schedule B7 – Growth Plans



Schedule D1&D2 – Heritage Resources & Archaeology



Schedule D3 – Heritage Resources – Old Town



Schedule D4 – Areas of Heritage Significance



Schedule E1 – Transportation Network

ROAD RIGHT-OF-WAY WIDTHS MUNICIPAL ROADS SECTION

Street/Road	From	To	Designated Road Right-of-way Width
Addison Avenue	Shakespeare Avenue	Circle Street	15.24 m (50 ft.)
Arnold Road	Concession 1 Road	Concession 2 Road	20.12 m (66 ft.)
Ball Street	Ricardo Street	Lake Ontario	20.12 m (66 ft.)
Campbell Street	Charlotte Street	Green Street	9.14 m (30 ft.)
Carlton Street Extension	Carlton St. (Reg Rd 83)	Read Road	20.12 m (66 ft.)
Charlotte Street	John Street East	East n.e. of Niagara Street	19.5 m (64 ft.)
Church Street	Read Road	Townline (Grantham) Road	20.12 m (66 ft.)
Clarence Street	entire roadway		18.29 m (60 ft.)
Concession 2 Road	Niagara River Parkway	Front Street South	18.29 m (60 ft.)
Concession 4 Road	East and West Line	York Rd. (Reg Rd 81)	26.21 m (86 ft.)
Concession 6 Road	Niagara Stone Road (Reg Rd 55)	Line 3 Road	26.21 m (86 ft.)
Cross Street	Niagara Falls/NOTL municipal boundary	East and West Line	26.21 m (86 ft.)
Deer Road 1	Stewart Rd. (Reg Rd 86)	Eastern terminus	18.29 m (60 ft.)
Deater Street	Niagara River Parkway	Queenston Street	20.12 m (66 ft.)
Dixie Avenue	King Street	Meville Street	20.12 m (66 ft.)
Dumfries Street	Lakeshore Road (Reg Rd 87)	Circle Street	15.24 m (50 ft.)
Eastchester Avenue	Niagara River Parkway	River Frontage Road	20.12 m (66 ft.)
Flynn Street	Stewart Road (Reg Rd. 86)	Western terminus	20.12 m (66 ft.)
Froebel Avenue	Charlotte Street	Rye Street	15.24 m (50 ft.)
Front Street South	Circle Street	Northern terminus	15.24 m (50 ft.)
Front Street South	York Street	Partition Street	18.29 m (60 ft.)
Green Street	Highlander Street	Maple Street	18.29 m (60 ft.)
Irvine Road	Niagara Street	Flynn Street	18.29 m (60 ft.)
Highlander Street	Church Street	Lake Ontario	20.12 m (66 ft.)
Kent Street	Niagara River Parkway	Front Street South	18.29 m (60 ft.)
Lakeview Street	Niagara River Parkway	Front Street South	18.29 m (60 ft.)
Lansdowne Avenue	Orchard Drive	Niagara Boulevard	15.24 m (50 ft.)
Lincoln Avenue	Niagara Boulevard	Palatine Place	15.24 m (50 ft.)
Line 1/Panmer Street	Airport Road (Reg Rd 90)	Eastern terminus	20.12 m (66 ft.)
Line 1 Road	Four Mile Creek Road	Concession 4 Road	26.21 m (86ft.)
Line 2 Road	Niagara Stone Road (Reg Rd 55)	Concession 4 Road	26.21 m (86 ft.)
Line 2 Road	Niagara Stone Road	Concession 6 Road	26.21 m (86 ft.)
Lockhart Street	Meville Street	Northwestern terminus	20.12 m (66 ft.)
Luther Avenue	Shakespeare Avenue	Circle Street	15.24 m (50 ft.)
Market Street	Regent Street	Court House Parking Lot	16.46 m (54 ft.)
Market Street	King Street	Court House Parking Lot	16.46 m (54 ft.)
Martin Road	Queenston Road	Townline (Grantham) Road	20.12 m (66 ft.)
Maple Street	Princess Street	River Frontage Road	18.29 m (60 ft.)
Michab Road	Carlton Street (Reg Rd 83)	Lake Ontario	20.12 m (66 ft.)
Melville Street	Byron Street	Niagara River	20.12 m (66 ft.)
Nelson Street	Nelson Street	Byron Street	23 m (75.47 ft.)
Niagara Boulevard	Palatine Place	Vincent Avenue	20.12 m (66 ft.)
Niagara Street	East and West Line	Rye Street	26.21 m (86 ft.)
Niven Road ?	Niagara Stone Road (Reg Rd 55)	Village Road	20.12 m (66 ft.)
Oak Drive	Lakeshore Road (Reg Rd 87)	Circle Street	15.24 m (50 ft.)
Orchard Drive	Lansdowne Avenue	Palatine Place	15.24 m (50 ft.)
Parford Street	Charlotte Street	King Street	15.24 m (50 ft.)
Palatine Place	Circle Street	Niagara Boulevard	20.12 m (66 ft.)
Partition Street	Niagara River Parkway	Front Street South / Princess Street	18.29 m (60 ft.)
Paxton Lane	York Road (Reg Rd 81)	Southern terminus	20.12 m (66 ft.)
Princess Street	Partition Street	Northern terminus	18.29 m (60 ft.)
Queenston Street	Niagara River Parkway (south intersection)	Niagara River Parkway (north intersection)	20.12 m (66 ft.)
Read Road *	Carlton Street (Reg Rd 83)	Lake Ontario	20.12 m (66 ft.)
Ricardo Street	Nelson Street	King Street	23 m (75.47 ft.)
Riverbeach Drive	Meville Street	Western terminus	20.12 m (66 ft.)
Rye Street	Niagara Street	Flynn Street	18.29 m (60 ft.)
Scott Street	Read Road	Townline (Grantham) Road	20.12 m (66 ft.)
Shakespeare Avenue	Lakeshore Road (Reg Rd 87)	Northern terminus	15.24 m (50 ft.)
Townline (Grantham) Rd	Lakeshore Road (Reg Rd 87)	Lake Ontario	20.12 m (66 ft.)
Townline (Grantham) Rd 4	Lakeshore Road (Reg Rd 87)	Carlton Street (Reg Rd 83)	20.12 m to 37 m (66 ft. – 116.4 ft)
Townline (Grantham) Rd	Queenston Road	York Road (Reg Rd 81)	26 m (85.3 ft.)
Vincent Avenue	Circle Street	Shakespeare Avenue	15.24 m (50 ft.)
Walnut Street	Queenston Street	Princess Street	18.29 m (60 ft.)
Warner Road	Four Mile Creek Road (Reg Rd 100)	Queen Elizabeth Way	20.12 m (66 ft.)
Wesley Avenue	Circle Street	Northern terminus	15.24 m (50 ft.)
Wilberforce Avenue	Circle Street	Niagara Boulevard	15.24 m (50 ft.)
Wyndie Avenue	Shakespeare Avenue	Circle Street	15.24 m (50 ft.)
All Other Rural Roads			20.12 m (66 ft.)

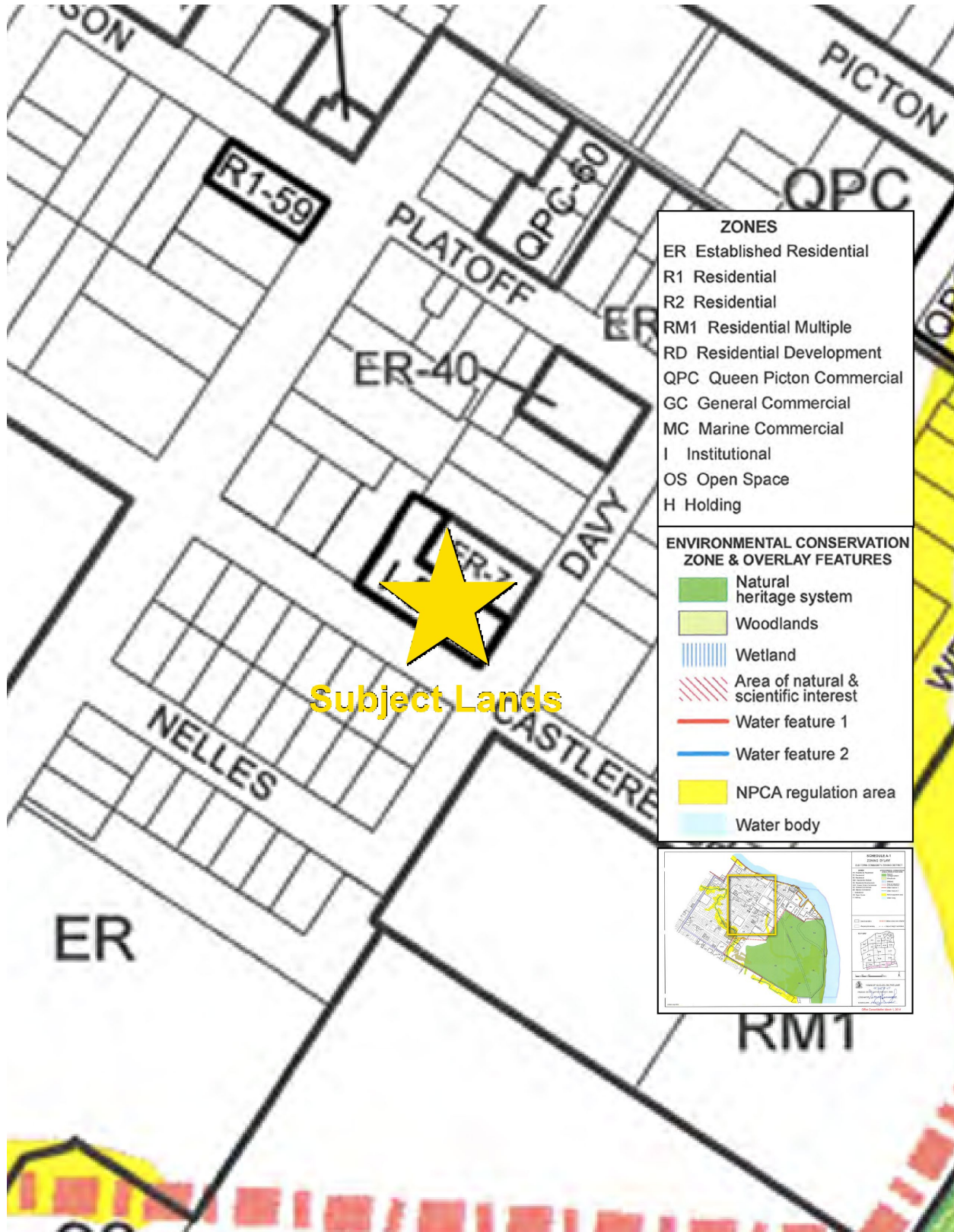
All Other Urban Roads except those developed under a Plan of Subdivision since 1970 (Plan of Subdivision width prevails)

- Southern edge of the required right-of-way is defined by the southern boundary (and projection thereof) of Parts 3 & 4 on Plan 30R-10929
- Full widening to be taken from the west side of Niven Rd.
- Read Road is shared with the City of St. Catharines, therefore a maximum of 50% of the widening necessary to achieve the desired road width is to be taken on the east (NOTL) side.
- Townline (Grantham) Rd. requires a variable widening along the westerly boundary of the road allowance as the municipal drainage channel occupies most of the existing right-of-way. Required widening to be measured 2.0 metres west of the existing western edge of the travelled roadway.

* Pending Further Review



Appendix 5: Town of Niagara-on-the-Lake Zoning By-law Map



Schedule A-1 Old Town Community Zoning District

Appendix 6: Draft Zoning By-law Amendment

**THE CORPORATION
OF THE
TOWN OF NIAGARA-ON-THE-LAKE**

BY-LAW NO. 4316##-XX

25 and 43 Castlereagh Street

Roll # 262701000309000

A BY-LAW PURSUANT TO SECTION 34 OF THE ONTARIO *PLANNING ACT* TO AMEND BY-LAW NO. 4316-09, AS AMENDED, ENTITLED A BY-LAW TO REGULATE THE USE OF LAND AND THE CHARACTER, LOCATION AND USE OF BUILDINGS AND STRUCTURES THEREON.

WHEREAS the Town of Niagara-on-the-Lake Council is empowered to enact this By-law by virtue of the provisions of Section 34 of the *Planning Act*, R.S.O. 1990, c.P.13, as amended;

AND WHEREAS this By-law conforms to the Town of Niagara-on-the-Lake Official Plan;

NOW THEREFORE THE COUNCIL OF THE CORPORATION OF THE TOWN OF NIAGARA-ON-THE-LAKE enacts as follows:

1. That Schedule ‘A-1’ of By-law 4316-09, is amended by changing the zoning of Lands identified on Schedule ‘A’ (attached to and forming part of this By-law) from “Institutional – 54 (I-54) Zone” in part and Established Residential (ER) Zone, in part to “Institutional (I-XX) – Site-Specific Zone”.
2. That Section 7.14 – Site Specific Exceptions, as amended, is hereby further amended by deleting the subsection 7.14.54 and adding the following subsection:

7.14.XX 25 and 43 Castlereagh Street – See Map A (I-XX)

Notwithstanding the provisions of the “Old Town Community Zoning – Institutional (I) Zone”, the following provisions shall apply to the lands identified as I-XX on Schedule ‘A-1’:

7.14.XX.1 I-XX Zone Requirements

In lieu of the corresponding provisions of Subsection 7.10.2, and in addition to such provisions, the following provisions shall apply on the lands identified as “Institutional (I-XX) on Schedule “A-1”:

(a)	Minimum front yard setback of the existing buildings <i>(for the purpose of this site-specific zoning, the front yard will be that part of the lot that has frontage on Castlereagh Street)</i>	3.3 m & 10.1 m
-----	--	-------------------

(b)	Maximum lot coverage	32%
(c)	Minimum interior side yard setback	3.0 m & 1.8 m
(d)	Minimum interior side yard setback for the existing building	0 m
(e)	Minimum exterior side yard setback of the existing building	6.61 m
(f)	Minimum rear yard setback	7.5 m & 5.0 m
(g)	Maximum building height	11.5 m

7.14.XX.2 I-XX Buffer Strip

Notwithstanding the provisions of Subsection 7.10.3 of Zoning By-law 4316-09, as amended, a 3.0 m wide buffer strip adjacent to a residential zone is not required.

7.14.XX.3 I-XX Loading Space Requirements

Notwithstanding the provisions of Subsection 6.27 of Zoning By-law 4316-09, as amended, the minimum number of required loading spaces shall be 0 spaces.

7.14.XX.4 I-XX Parking Space Requirements

Notwithstanding the provisions of Subsection 6.39 and 6.42 of Zoning By-law 4316-09, as amended, the minimum number of required parking spaces, including accessible spaces, shall be 0 spaces.

7.14.XX.5 I-XX Yard Projection and Encroachment Requirements

Notwithstanding the provisions of Subsection 6.44 of Zoning By-law 4316-09, as amended,

- a. the unenclosed porch on 43 Castlereagh Street, shall be permitted to project up to the required front yard, and recognized as existing.
- b. the unenclosed porch and ramp on 25 Castlereagh Street, shall be permitted to project 5.2 m up to the required front yard.
- c. a basement projection or uncovered steps, with a maximum height of 0.5 m above grade shall be permitted to encroach 1.8 m into the eastern interior side yard.

3. All other provisions of Zoning By-law 4316-09, as amended, shall continue to apply to the lands shown on the attached Schedule.

READ A FIRST, SECOND AND THIRD TIME THIS _____ DAY OF _____,
202X.

LORD MAYOR GARY ZALEPA

TOWN CLERK GRANT BIVOL

Schedule A



Appendix 7: Correspondence and Confirmation from Staff

Confirmation Regarding the Archaeological Assessment

From: Sumra Zia B. Arch., Dipl. Architectural Conservation <Sumra.Zia@notl.com>
Sent: November 13, 2025 9:55 AM
To: Marcus Letourneau <mletourneau@npgsolutions.ca>
Cc: Denise Horne <dhorne@npgsolutions.ca>; Victoria Nikoltcheva, MCIP, RPP <Victoria.Nikoltcheva@notl.com>
Subject: RE: 25-43 Castlereagh Street (NOTL Museum)

Hi Marc,

As per our conversation yesterday and after internal discussions, I can confirm that for ZBA a Stage 1 AA with the Ministry letter would suffice with an understanding that any further assessments that are required would be submitted at the site plan stage.

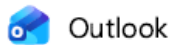
Let me know if there are any further questions.

Regards,

Sumra Zia B. Arch., Dipl. Architectural Conservation
Senior Heritage Planner
Sumra.Zia@notl.com

Town of Niagara-on-the-Lake
1593 Four Mile Creek Road
P.O. Box 100, Virgil, ON L0S 1T0
Telephone: (905) 468-3266
Website: www.notl.com

Confirmation Regarding the Servicing and Geotechnical Study



RE: 25 and 43 Castlereagh St - Geotechnical Study

From Robert Alguire <robert.alguire@notl.com>

Date Mon 2025-12-01 4:21 PM

To Rhea Varghese <rvarghese@npgsolutions.ca>; Aaron Butler <abutler@npgsolutions.ca>

Cc Anthony Infurna <ainfurna@hallex.ca>; Alex Topps <toppsalex@gmail.com>; Victoria Nikoltcheva, MCIP, RPP <Victoria.Nikoltcheva@notl.com>

Hello,

As discussed previously, the detailed grading and site servicing plans are required at the Site Plan Approval stage and not for the Zoning By-law Amendment.

Sincerely,

Robert Alguire
Engineering Technologist
robert.alguire@notl.com

Town of Niagara-on-the-Lake
1593 Four Mile Creek Road
P.O. Box 100, Virgil, ON L0S 1T0
Telephone: (905) 468-3266
Website: www.notl.com

Confirmation Regarding the Heritage Requirements

From: Marcus Letourneau
Sent: November 6, 2025 1:23 PM
To: 'Victoria Nikoltcheva, MCIP, RPP' <Victoria.Nikoltcheva@notl.com>; Sumra Zia B. Arch., Dipl. Architectural Conservation <Sumra.Zia@notl.com>; Aaron Butler <abutler@npgsolutions.ca>
Subject: RE: 25-43 Castlereagh Street - Heritage Requirements

Good Afternoon,

Thank you for meeting today.

To summarize our discussion:

<https://outlook.office.com/mail/inbox/id/AAkALgAAAAAHYQDEapmEc2byACqAC%2FEWg0An127f8U0keyoanCfaw8AwAFbEIKogAA?nativeVersion=...>

11/24/25, 1:28 PM

Inbox - Rhea Varghese - Outlook

1. A scoped HIA is not required, but the PJR will need to include a discussion of previous heritage approvals and how the project meets provincial requirement.
2. The updated by-law is not required for the rezoning. There is some discussion on needing to fix it at some point, but this can be deferred for now. The town is reviewing my suggest that any update be completed as part of the ongoing HCD process.
3. The museum project is exempt from the current interim control by-law, particularly as the project has a heritage permit. Any changes to the approved design will need an amending OHA permit.
4. For the archaeology, only the report will be required for the ZBA. The MCM review and acceptance letter can be part of the complete application for site plan.

Regards
Marc

Marcus R. Letourneau (he/him), PhD, MPlan, MCIP, RPP, CAHP, CIPM II
Senior Partner
M 613 331 0988 E mletourneau@npgsolutions.ca



Our Offices: Niagara Falls | Hamilton | Toronto | Kingston
Office Phone: 905.321.6743 Website: www.npgsolutions.ca

Appendix 8: Heritage Attributes, Impact and Mitigation Assessment Chart

NPG has reviewed ASI’s HIA, dated July 2021, prepared as part of the previously approved Heritage Permit (HER-48-2021) process. The proposed two-storey addition behind Memorial Hall was included in the prior approval and has not been reassessed in this review. This Appendix provides a scoped review of the proposed connection between the proposed two-storey addition and the existing building at 25 Castlereagh Street (or “proposed connection”), as illustrated in red in **Figure 4**.

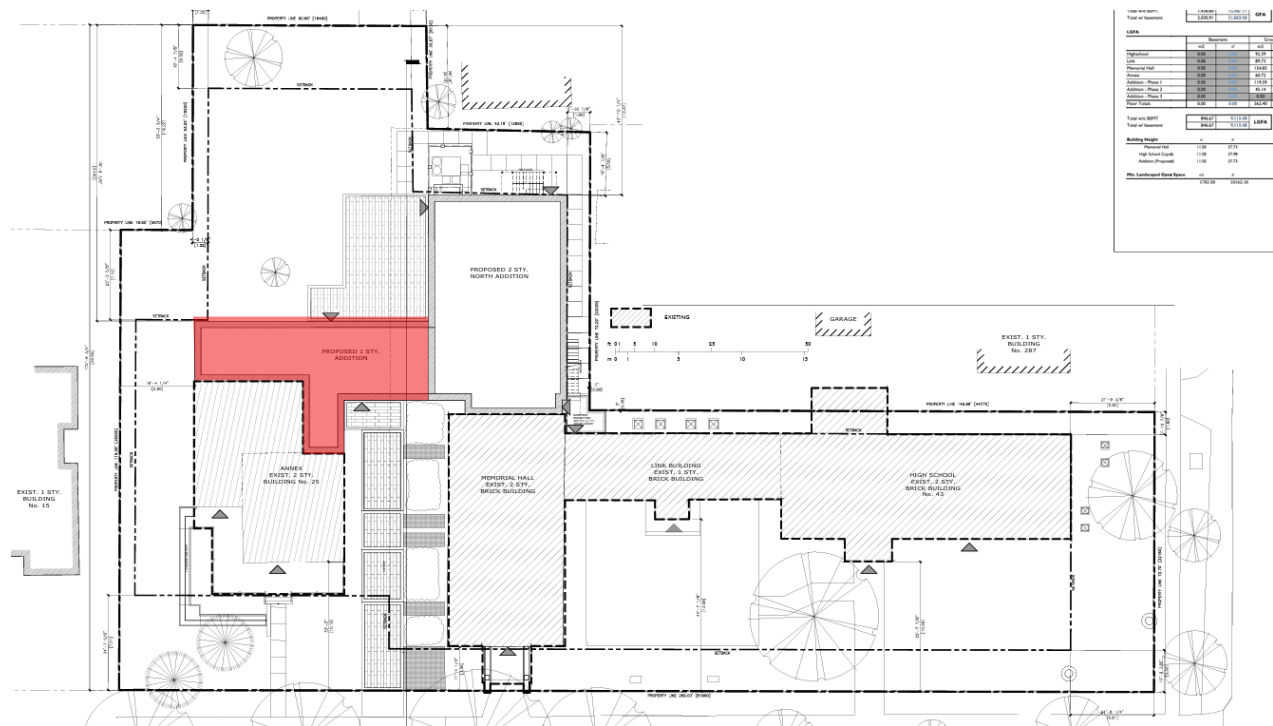


Figure 4 – Proposed Connection

Surrounding Streetscape

As noted in ASI’s HIA, the surrounding streetscape is predominantly residential in nature. The street benefits from a mature tree canopy and the buildings along the street generally exhibit deep setbacks, contributing to a well-established and green streetscape. The proposed building addition respects the existing streetscape by maintaining the current locations and setbacks of the existing buildings. The mature tree canopy and landscaped character will also be conserved, with opportunities for enhancement through selective planting and material choices during detailed design.

The proposed connection, which is the westward extension of the building addition, is setback behind the existing buildings and will only be partially visible from Castlereagh Street. This space is currently used for driveway and parking purposes, as shown in **Photo 3**, contains no existing trees, and is proposed to become the main entrance of the integrated museum facility. The addition will be complemented by landscaping improvements (as shown in **Figure 4**), enhancing this portion of the Castlereagh streetscape from its existing condition. Additionally, the mature trees along the

Castlereagh Street right-of-way will provide a natural visual barrier, ensuring the proposed connection is largely screened from the streetscape except when viewed directly from the front. This approach conserves the existing streetscape character of Castlereagh Street.

The proposed addition remains secondary and subordinate to the existing buildings on the Subject Lands. While the proposed building addition introduces a new built form, its integration within the existing context will be compatible in form, scale, and massing with the surrounding built forms. Detailed architectural articulation, including materials and finishes that complement local architectural traditions, landscaping treatments, view from the streetscape and preservation of existing vegetation will be addressed through the *Ontario Heritage Act* permit and Site Plan Approval processes.

ASI's Mitigation Measures

ASI's HIA recommended specific mitigation measures for the rear addition on 43 Castlereagh Street. This included preparing a Cultural Heritage Documentation Report prior to construction to record existing conditions, engagement of qualified contractors experienced with heritage buildings, and implementation of underpinning and temporary shoring in accordance with geotechnical and structural recommendations to prevent vibration-related impacts during excavation and backfilling. NPG concurs with these findings and recommends the same mitigation measures be applied to the construction of the proposed connection with 25 Castlereagh Street.

Heritage Attributes and Impact Assessment

Table 9 on the following page identifies and evaluates documented heritage attributes of Memorial Hall, the Link Building and the High School Building, per Designation By-law No. 1463-84¹, against a range of possible impacts outlined in the *Ontario Heritage Tool Kit, InfoSheet #5: Heritage Impact Assessments and Conservation Plans* (Ministry of Tourism and Culture, 2006). This document is referenced within the Town's Heritage Impact Assessment requirements, dated 17 May 2021, which states:

An assessment of alternative development options, mitigation measures, and conservation methods to avoid and limit the negative impact on any cultural heritage resource including, but not limited to, methods outlined in the Ontario Heritage Tool Kit.

Conclusion

Based on the assessment undertaken, the proposed connection between 25 Castlereagh Street and the previously approved rear addition on Memorial Hall has been carefully designed to respect the streetscape character of the area by its placement setback from the existing buildings. The proposed connection will be positioned within the location of existing parking and driveway area and contains no existing trees. The mature tree canopy and landscaped character will also be conserved, with opportunities for enhancement through selective planting and material choices during detailed design.

Although construction of the proposed connection will involve land disturbance, forthcoming archaeological and servicing studies will ensure that no adverse effects occur

on any identified archaeological resources. NPG agrees with the recommendation provided as part of the 2021 Heritage Permit for the two-storey rear addition. Mitigation measures, including preparation of a Cultural Heritage Documentation Report, engagement of qualified heritage contractors, and implementation of underpinning and temporary shoring in accordance with geotechnical and structural recommendations. These measures will be addressed through the *Ontario Heritage Act* permit and Site Plan Approval processes.

Overall, the proposed connection will not affect the identified heritage attributes on 43 Castlereagh Street, as detailed in **Table 9** below. It remains secondary and subordinate to the existing buildings on 43 Castlereagh Street. The proposed connection's form, scale, and massing are compatible with the surrounding context, as discussed in detail in Section 5.5.7 of this Report. Further detailed designs, including materials and landscaping, will be addressed through the *Ontario Heritage Act* permit and Site Plan Approval processes.

Table 9 – Heritage Attributes, Impact and Mitigation Assessment Chart

ATTRIBUTES (as per Designation By-law No. 1463-84)	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;	Direct or indirect obstruction of significant views or vistas within, from, or of built and natural features	A change in land use such as rezoning a battlefield from open space to residential use, allowing new development or site alteration to fill in the formerly open spaces;	Land disturbances such as a change in grade that alters soils, and drainage patterns that adversely affect an archaeological resource.
Memorial Hall							
<p>Memorial Hall is a two-storey rectangular brick building with full attic, and hipped roof. The features and details on the face of the building remain, and are unaltered since its construction in 1906. The rectangular lines of the face of the building are de-emphasized by the addition of a stepped front gable and a deep porch or portico.</p>	<p>No impact as the proposed connection to 25 Castlereagh Street is not directly connected to Memorial Hall. It is connected to the rear addition to be constructed.</p> <p>Detailed designs for the connection will be provided as part of an <i>Ontario Heritage Act</i> Permit and will be subject to Site Plan Approval.</p> <p>ASI provided several mitigative recommendations for the construction of the two-storey addition to the rear of Memorial Hall. These should be applied to the proposed connection as well.</p>	<p>No impact as the proposed connection to 25 Castlereagh Street is not directly connected to Memorial Hall. It is connected to the rear addition to be constructed.</p> <p>Landscape alterations will be made to the west side of Memorial Hall, with the addition of a walkway leading to the new entrance. These alterations will provide an aesthetic enhancement to the Subject Lands as compared to the existing driveway area and improve the Subject Land's character and functionality as a museum. The landscaping shown on SK-002 in the Architectural Package</p>	<p>The proposed connection, being one-storey high and lower than the two-storey Memorial Hall, will not result in the creation of shadows that will alter the appearance of a heritage attribute or change the viability of a natural feature or plantings.</p> <p>The proposed connection is not expected to cause shadowing along the Castlereagh Street frontage. The majority of shadowing will occur to the north, where the building is set back 23.42 metres from the north property line.</p>	<p>The proposed connection will not result in the isolation of any heritage attributes.</p>	<p>The proposed connection will not result in the obstruction of significant views.</p> <p>The connection will be secondary and subordinate to Memorial Hall. The proposed connection is set back behind Memorial Hall, and the mature trees along the Castlereagh Street right-of-way will provide a natural visual barrier, ensuring the proposed connection is largely screened from the streetscape except when viewed directly from the front. Further, its lower massing, height and flat roofline will not overwhelm or detract from the cultural heritage value of Memorial Hall.</p>	<p>The proposed connection is situated on a currently vacant portion of the Subject Lands and accessed from between the two existing buildings that are currently being used for parking and driveway purposes.</p> <p>The proposed connection is set back behind Memorial Hall are largely screened from the Castlereagh streetscape. The proposed connection supports the museum's continued operation. There will be no negative impact as the proposed connection will not result in a change in land use.</p>	<p>The proposed connection will result in land disturbance due to the anticipated construction work. Further archaeological studies and servicing studies are forthcoming to ensure the construction work does not have adverse impacts on any potential archaeological resource.</p>

ATTRIBUTES (as per Designation By-law No. 1463-84)	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;	Direct or indirect obstruction of significant views or vistas within, from, or of built and natural features	A change in land use such as rezoning a battlefield from open space to residential use, allowing new development or site alteration to fill in the formerly open spaces;	Land disturbances such as a change in grade that alters soils, and drainage patterns that adversely affect an archaeological resource.
		is conceptual. Detailed landscape plans will be prepared as part of the Site Plan Approval and the <i>Ontario Heritage Act</i> permit process.			As a result, the proposed development will not negatively impact the Castlereagh Street frontage.		
<i>The door opening and window openings on the first and second floor have segmental heads. The openings in the gable have semi-circular heads.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>On the ground floor, a double doorway with glazed upper panels is balanced by two windows with single-hung, divided sash windows-~(smaller upper sash with eight panes and larger lower sash with solid panes of glass).</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>On the second floor, there is a row of seven windows. Three of the windows are grouped in the</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)

ATTRIBUTES (as per Designation By-law No. 1463-84)	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;	Direct or indirect obstruction of significant views or vistas within, from, or of built and natural features	A change in land use such as rezoning a battlefield from open space to residential use, allowing new development or site alteration to fill in the formerly open spaces;	Land disturbances such as a change in grade that alters soils, and drainage patterns that adversely affect an archaeological resource.
<p><i>centre, and vertically aligned with the gable above and the doorway below. On either side of this centre arrangement of windows are two windows vertically aligned with the inner corner of the horizontal cornice, and the windows below. All the windows on this level have single-hung divided sashes-- (smaller upper sashes with four panes each, and larger lower sashes with a single pane).</i></p>							
<p><i>A gabled roof over the porch is supported by four square corner columns. On the face of the porch the columns are spanned by a corbelled arch, and topped by the eave return of the roof. Arches also join the front and back</i></p>	<p>No impact due to the proposed connection (see above)</p>	<p>No impact due to the proposed connection (see above)</p>	<p>No impact due to the proposed connection (see above)</p>	<p>No impact due to the proposed connection (see above)</p>	<p>No impact due to the proposed connection (see above)</p>	<p>No impact due to the proposed connection (see above)</p>	<p>No impact due to the proposed connection (see above)</p>

ATTRIBUTES (as per Designation By-law No. 1463-84)	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;	Direct or indirect obstruction of significant views or vistas within, from, or of built and natural features	A change in land use such as rezoning a battlefield from open space to residential use, allowing new development or site alteration to fill in the formerly open spaces;	Land disturbances such as a change in grade that alters soils, and drainage patterns that adversely affect an archaeological resource.
<i>columns which are butted up against the face of the building. The bases of the columns and the floor of the porch are made from poured concrete.</i>							
<i>As on the [m]ain [f]acade, the rectangular lines of the sides of the structure are de-emphasized by the addition of stepped gables .</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>The building was built with commercially-manufactured red and buff brick. The foundation is constructed from coursed rubble, reported to have been obtained from the ruins of the Indian Council House and Hospital on the Common (Built in 1816 or 1817, destroyed by fire in 1881).</i>	No impact due to the proposed connection (see above)	There is no direct impact, however, ASI’s assessment notes a potential risk that the proposed underpinning and excavation work could negatively impact the structural condition of the Memorial Hall during construction. The Structural Assessment Report, conducted for the previously approved 2021 Heritage Permit process recommends	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)

ATTRIBUTES (as per Designation By-law No. 1463-84)	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;	Direct or indirect obstruction of significant views or vistas within, from, or of built and natural features	A change in land use such as rezoning a battlefield from open space to residential use, allowing new development or site alteration to fill in the formerly open spaces;	Land disturbances such as a change in grade that alters soils, and drainage patterns that adversely affect an archaeological resource.
		that excavation and underpinning be carried out very carefully and in stages to ensure existing footings are not undermined (AMR Engineering Ltd, 2018). NPG agrees with their recommendation.					
<p><i>The plinth of the walls and the sills of the openings are made of cut limestone, obtained from the John Rogers Dry Goods Store, Queen Street, Niagara (built 1834, demolished c. 1900.). Buff brick is used to decorate the window heads, and imitation stone quoins on the front corners of the building. On the side facade two vertical rows of buff brick arranged in a geometric pattern from cornice to foundation visually divide the facade into</i></p>	<p>No impact due to the proposed connection (see above)</p>	<p>No impact due to the proposed connection (see above)</p>	<p>No impact due to the proposed connection (see above)</p>	<p>No impact due to the proposed connection (see above)</p>	<p>No impact due to the proposed connection (see above)</p>	<p>No impact due to the proposed connection (see above)</p>	<p>No impact due to the proposed connection (see above)</p>

ATTRIBUTES (as per Designation By-law No. 1463-84)	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;	Direct or indirect obstruction of significant views or vistas within, from, or of built and natural features	A change in land use such as rezoning a battlefield from open space to residential use, allowing new development or site alteration to fill in the formerly open spaces;	Land disturbances such as a change in grade that alters soils, and drainage patterns that adversely affect an archaeological resource.
<i>three illusory facades.</i>							
<i>The brick pattern of the structure is a stretcher bond with flush joints, using quarter bricks to complete Several rows of inclined headers of buff brick openings. on the trims of the window heads -- on the first floor the top rows form segmental arches and on the top floor form flattened arches.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>The trim surrounding the side gable opening is also buff brick, with brick "Darte" at the quarters of the circle. The steps of the gables are capped with cut limestone, and cut limestone finials top the gables.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>The roof is finished in sheet metal applied in 1906. The trim of</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)

ATTRIBUTES (as per Designation By-law No. 1463-84)	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;	Direct or indirect obstruction of significant views or vistas within, from, or of built and natural features	A change in land use such as rezoning a battlefield from open space to residential use, allowing new development or site alteration to fill in the formerly open spaces;	Land disturbances such as a change in grade that alters soils, and drainage patterns that adversely affect an archaeological resource.
<i>the eaves and the added details are machine-made and original to the building .</i>							
High School Building							
A projected rectangular brick tower divides the face of the building into two proportionate "wings" each with two segmental headed window openings. The windows have double-hung divided sashes, six panes in each sash. The segmental headed door opening of the main entrance located at the base of the tower originally contained panelled double-doors and door transom with two panes of glass divided by vertical glazing bar.	No impact as the proposed connection to 25 Castlereagh Street is not directly connected to the High School Building.	No impact as the proposed connection to 25 Castlereagh Street is not directly connected to the High School Building.	No impact as the existing Memorial Hall building and proposed two-storey addition act as intervening structures between the proposed connection and the High School building.	The proposed connection will not result in the isolation of any heritage attributes.	The proposed connection will not result in the obstruction of significant views. The High School Building is visible from both Castlereagh and Davy Street, and the proposed connection will not obstruct these views.	The proposed connection will not result in a change in land use and is intended to operate as a museum.	The proposed connection may result in land disturbance due to the anticipated construction work. Further archaeological studies and servicing studies are forthcoming to ensure the construction work does not have adverse impacts on the archaeological resource.

ATTRIBUTES (as per Designation By-law No. 1463-84)	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;	Direct or indirect obstruction of significant views or vistas within, from, or of built and natural features	A change in land use such as rezoning a battlefield from open space to residential use, allowing new development or site alteration to fill in the formerly open spaces;	Land disturbances such as a change in grade that alters soils, and drainage patterns that adversely affect an archaeological resource.
<i>The eaves of the roof on the main structure is supported by a row of brackets, and faced with a plain horizontal cornice. The end chimneys were originally stepped and topped out in corbelled banding.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>The dominant feature of the main facade is the tower.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>The span of the arch of the door trim is centered by a stone keystone pointing to the datestone above. The brackets on the main building are continued along the horizontal eaves of the Tower, and terminate at the front gable. The gable, decorated with barge board and turned pendants accenting the rising eaves of the gable, contains a round gable light. The horizontal</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)

ATTRIBUTES (as per Designation By-law No. 1463-84)	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;	Direct or indirect obstruction of significant views or vistas within, from, or of built and natural features	A change in land use such as rezoning a battlefield from open space to residential use, allowing new development or site alteration to fill in the formerly open spaces;	Land disturbances such as a change in grade that alters soils, and drainage patterns that adversely affect an archaeological resource.
<i>cornice of the Tower and the verges of the gable are decorated with cyma recta moulding.</i>							
<i>Built-in cornice gutters carry runoff from the roof to downspouts mounted on the main building.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>The ridge of the roof of the front gable is interrupted by the „ addition of mansard roof the top of which forms the base of the belfry.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>Around 1910 a brick extension was built from the south-east end wall to provide space for an auditorium. The lines of the main structure and the row of brackets were continued on this addition. The gable brackets, collar and moulding were probably removed</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)

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<i>and relocated at the gable of the addition. A wider door opening maintains the shape of its counter part on the Tower.</i>							
<i>The window opening does not--the segmental heads are eliminated. Three single-hung divided sash windows are proportionately divided by two wooden mullions, and contained in one rectangular opening.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>The building was constructed with commercially manufactured red and buff brick.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>The brick pattern on the main facade is a stretcher bond with flush joints. The courses are finished with quarter brick at the door and window openings.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)

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<i>A different pattern is evident on the north-west end wall, using a common bond with flush joints which was probably repeated on the opposite end wall of the original structure.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>Emphasis is given to the trim of the door and window heads by the use of buff brick. The span of the arches on the main facade consist of a single row of inclined brick, complemented by vertical row of projected brick. The arch of the main door opening is topped with another row of inclined headers. The trim of the gable light is a circle of headers, above which is another row of right-angled inclined headers following the contour of the opening in semi-circular pattern.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)

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<i>The sills of the windows and doors of the building are made from cut limestone.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>The wood trim, brackets and barge board are machine made, almost all of which is original to the building.</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)
<i>The former high school is one of four buildings in the Town of Niagara-on-the-Lake which were built using poly-chromatic brickwork to emphasize structural features, openings, and the lines of the buildings. The features and details of this building, given contemporary interpretation by the building, are derived from those of the Gothic and Italianate Vernacular styles prevalent in the architecture of</i>	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)	No impact due to the proposed connection (see above)

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<i>Ontario a generation before.</i>							
Link Building							
<i>From 1971 to 1973 the Society carried out a renovation programme for its facilities. Included in this programme was the construction of a joining Bridge between Memorial Hall and the High School. Eight windows were obtained from the Parish of St. Mark's Church, c. 1886, removed from the Parish Hall when it was renovated in 1965 and installed in the front facade of the Bridge.</i>	No impact as the proposed connection to 25 Castlereagh Street is not directly connected to the Link Building.	No impact as the proposed connection to 25 Castlereagh Street is not directly connected to the Link Building.	No impact as the existing Memorial Hall building and proposed two-storey addition act as intervening structures between the proposed connection and the Link building.	The proposed connection will not result in the isolation of any heritage attributes.	The proposed connection will not result in the obstruction of significant views. The Link Building is only visible from Castlereagh Street, and the proposed connection will not obstruct these views.	The proposed connection will not result in a change in land use and is intended to operate as a museum.	No impact as the proposed connection to 25 Castlereagh Street is not directly connected to the Link Building.