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## **Second Peer Review**

### ***Response to Norval Quarry Rezoning Application (Brampton Brick) Peer Review of the Cultural Heritage Study and Cultural Heritage Impact Assessment Report, March 28, 2012, prepared by Archaeological Services Inc.***

#### **Purpose**

The purpose of the Archaeological Services Inc. Response report is clearly stated in the memorandum. The memorandum was prepared in response to comments in the Peer Review by Unterman McPhail Associates of the above-noted Rezoning Application and further clarified during a teleconference held on July 21, 2011.

The 2012 memorandum study has prepared additional inventory, and impact assessment analysis within the 300 m of the area proposed licensing.

The stated purpose of the memorandum is to accompany the 2008 and 2010 reports.

Comment: The purpose of the memorandum is clear and concise based on the site documentation available.

#### **Approach and Methodology**

The memorandum has restated provincial and municipal policies and guidance for the assessment, evaluation and conservation of cultural heritage resources.

#### Comment

The memorandum sets out the policies as described in the identified documents. It confirms the heritage significance of 10315 Winston Churchill Boulevard was supplemented with additional comparative analysis within the 300 m buffer. The comparative analysis completed within 300 m of the project site is considered too narrow a sample for review. It is recommended the original townships within the 300 m impact study be used as a comparative for this project.

## **Information**

Under this category the additional research content supplemented with existing and historical mapping is well presented. The study information related to the off-site 300 m study impact zone is thorough.

## Comment

The memorandum provides a link to the Visual study by Todhunter Associates and incorporates the Visual impact and mitigation measures into the Cultural Heritage report conclusions.

The Haul Route/Transportation study within 300 m has been completed. It is still necessary the Haul Route impacts be studied for a complete report to measure impacts and prepare mitigation. This would permit mitigation measures to be developed that are not solely related to the on-site or 300m buffer study area.

The following gaps in information are noted:

Haul Route impacts outside of 300 m remain to be identified. More information is required for these off-site impacts to adjacent cultural heritage resources so that mitigation actions can be identified.

CHL 6 is not identified on Figure 9. Page 44.

## **Mitigation/Monitoring**

A review of mitigation actions for both on-site and off-site impacts was completed.

## Comment

Mitigation should be offered for cultural heritage resources along the haul route when the study is prepared.

More detailed information related to screening to the north of CHL 5 is recommended. On what basis was a 2-metre conifer selected as a screen from the berm?

As stated in the initial peer review, the value of cultural heritage resources on-site may be considered of greater heritage value if the study area is expanded beyond 300 m and the comparative analysis deem the properties to be of greater cultural heritage significance or value. More detailed mitigation may be required if this is the result of further study.

### **Adequacy**

Generally, the 2012 memorandum is well prepared and meets the standard assessment and evaluation measures for a CHAR and HIA with the exception of gaps in analysis related to off-site comparative analysis and further haul route analysis and evaluation.

### **Comment**

Comparative analysis of the project site and an examination beyond 300m off-site study area would fill in the gap in assessment and evaluation. Consultation with the Brampton Heritage Co-ordinator and the Halton Heritage Planner to review additional comparative is recommended.

### **Interdisciplinary Discussion with the Visual Peer Review Expert**

It is recommended that the Visual Peer consultant review the Rezoning Application design plans to confirm if impacts have been mitigated satisfactorily.

**Norval Quarry Rezoning Application (Brampton Brick)**

November 2012

**Peer Review Results Chart - Cultural Heritage Resources**

This table is to provide a summary of the peer review work and must be submitted with the peer review report (draft and final).

It is not meant to be fully comprehensive, but to provide a starting point to organize thoughts and lead to final conclusions on the peer review assignment.

<b>Guideline Question</b>	<b>Findings in the initial Peer Review Results</b>	<b>Findings in the Second Peer Review Results -2012</b>	<b>Implications if this concern/issue is not addressed</b>
<b>Purpose</b>			
Is the purpose of the work clearly and understandably stated in the applicant's report?	<p>2008—generally purpose is well articulated for the period of the report. No discussion of off-site haul route. No inclusion of the 120m or 300m study area zones.</p> <p>2010- HIA report is clear. However, the scope is too narrow, involving only two properties. The other sites within the larger study areas were not considered.</p>	<p>The memorandum report addresses the impacts of the off-site haul route within the 300m buffer of area proposed for licensing. Cultural heritage resources identified and subject to impact assessment within the 300 m buffer area were assessed.</p>	<p>There is no information related to the haul route alternatives beyond 300 m. To measure associated impacts beyond 300 m an impact zone along route alternatives should be established.</p> <p>Haul Route assessment will inform the study more fully when available.</p>
Does the purpose set out the proper direction to undertake the study?	<p>2008-yes</p> <p>2010-yes, within the City of Brampton HIA guidelines. However, the scope is too limited to the</p>	<p>The memorandum report addresses the impacts of the off-site haul route within the 300m buffer of area proposed for licensing. Cultural heritage</p>	<p>As above.</p>

	Brampton Brick defined study area for Cultural Heritage Resources.	resources identified and subject to impact assessment within the 300 m buffer area were assessed.	
<b>Methodology</b>			
Is the methodological approach technically sound? Is the review of issues, data, facts objective and appropriate?	2008-historical data is good. Objective good.  2010- follows HIA guideline	The memorandum report broadened the process of field survey and impact assessment for cultural heritage resources within 300m of the area proposed for licensing.	The report provides a more complete assessment as requested. The comparative analysis of similar cultural resources within the 300m buffer is too narrow. The comparative should apply respectively to cultural heritage resources in the former Chinguacousy Township and Esquesing Township.
Does the peer review identify any technical concerns stemming from the methodology (and assumptions made to inform the methodology) that may compromise the analysis and/or conclusions of the report?	2008- study does not address potential visual impacts from Heritage Road 2010 as above.	The memorandum report prepared a response which addresses visual impacts of the application on cultural heritage resources located within 300 m. It concluded the active quarry operations would be screened from the farm complex located at 10294 Heritage Road. Associated long-range views from the farm	The review of the visual impacts comprehensive based on information available from Todhunter Associates. Should the plan be altered, a new visual impact assessment for cultural heritage resources should be completed.

		<p>entrance drive would be “altered” by the introduction of an earthen berm. The visual impacts were determined to be not significantly adverse. The reports states the existing vegetation will screen the berm and comprises part of the background views looking westerly from the entrance drive to the farm. The report confirms the existing visual experience will not be significantly distorted along the entrance drive. The remaining visual impacts were evaluated and judged to be not significant or were unchanged. CHL 5 will receive a vegetative screen enhancement to the northeast.</p>	
<p><b>Information</b></p>			
<p>Are relevant data and facts clearly and consistently presented in the technical report?</p>	<p>2008- facts clearly presented 2010- facts clearly presented</p>	<p>The 2012 memorandum report has provided the facts clearly.</p>	<p>None</p>

<p>Is information gathered from appropriate sources? Is the information useful? Accurate? are there concerns regarding their quality or validity?</p>	<p>2008- yes, generally</p> <p>2010- yes, generally. However, the scope of the study was too limited. It did not include properties in the larger study area.</p>	<p>The memorandum report confirms that relevant contact with municipal heritage planning staff was complete. This contact provided sufficient information to inform the study within the 300 m buffer of the area proposed for licensing.</p>	<p>The comparative analysis should apply to cultural heritage resources in the former Chinguacousy Township and Esquesing Township beyond the 300 m buffer of the area proposed for licensing. The above noted issue related to the comparative analysis should be addressed.</p>
<p>Is the data used critical to the conclusions?</p>	<p>2008- generally yes</p> <p>2010- generally yes</p>	<p>Yes. The memorandum report response includes the cultural heritage resource inventory data and impact assessment within 300m of the area proposed for licensing.</p>	<p>The results are based on a critical review of the collected data. The data weakness relates to the comparative analysis.</p>
<p>Is the Brampton Brick report thorough/comprehensive/compl ete?</p> <p>To respond to this question, peer reviewers must consider accuracy, appropriateness and timing/seasonality of the data collection (if applicable).</p> <p>Where specific technical report</p>	<p>2008</p> <p>2010- more linkage should be made to the Visual study and the Haul Route/Transportation study.</p>	<p>The report establishes links between Archaeological Services Inc., Todhunter Associates and Long Environmental regarding the on-site haul route, vegetation management and site rehabilitation and the site plans prepared between 2008 and 2012.</p>	<p>The data weakness relates to the comparative analysis.</p>

<p>warrants, there may be a need to consider broader connections (i.e.: water inter-relationships). Please indicate if you feel this is lacking in the Brampton Brick report and what broader connections should be considered.</p>		<p>The study further addresses the cultural heritage value of 10315 Winston Churchill Boulevard based on comparative assessment within 300m of the area proposed for licensing.</p>	
<p>How comprehensive and complete are the recommended mitigation and monitoring measures proposed by Brampton Brick? This includes assessing direct and indirect impacts; short and long term aspects.</p>	<p>2008- this study was limited in terms of knowledge of the proposed final design. Minimal landscape buffering requested</p> <p>2010- the mitigation is too limited to the two residences and the site. More info needed for off-site resources</p>	<p>The report now provides impact assessment and mitigation actions for all identified cultural heritage resources within 300m of the area proposed for licensing.</p>	<p>More detailed information related to screening to the north of CHL 5 is recommended. On what basis was a 2-metre conifer selected as a screen from the berm?</p>
<p>The gap analysis will assess the relative importance of the data gaps and limitations to the project and identify potential options for addressing them. As such, a recommendation from a peer reviewer could be that additional survey and baseline</p>	<p>2008/2010- as stated above more off-site data should be collected.</p>	<p>As above.</p>	<p>Further local comparative analysis should be completed in the former Chinguacousy Township and Esquesing Township beyond the 300 m buffer of the area proposed for licensing.</p>



monitoring must be undertaken as the project proceeds, provided the necessary frameworks are in place to direct this data collection and any changes that are triggered.			
<b>Certainty</b>			
Are certainties and uncertainties of the proposal’s success openly and objectively stated in the applicant’s report/study?	Yes, as limited to the site and two adjacent properties	As above.	No concerns.
Are all assumptions clearly stated? Are the assumptions reasonable? Analysis of assumptions and parameters.	Yes, based on prescribed Brampton Brick study area, limited to the site and two adjacent properties	As above.	Clearly stated based on the existing drawings but does not contain haul route analysis.
Are the standards or thresholds commonly accepted in this type of technical area identified and appropriately utilized? (i.e.: transportation, soils, natural environment? Etc....)	Yes, based on prescribed Brampton Brick study area, limited to the site and two adjacent properties	As above.	The 300 m study area is using the proper tools for assessment.
<b>Issue Gaps</b>			
Are there issue gaps arising from	2008/2010- lacks comparative	The report responds by	A larger comparative

the review?	assessment in larger geographic/municipal context	addressing the cultural heritage value for 10315 Winston Churchill Boulevard through the evaluation of the comparatives within 300m of the area proposed for licensing.	assessment should be completed to measure the value in the larger contextual community.
Were the identified issues addressed in the technical report?	Yes, for the immediate study area, but there was no study impact addressed outside of the prescribed Brampton Brick study area within the 120m or 300m zone.	The 300 m study area was assessed as recommended.	The comparative analysis is limited to within the 300 m study area and should be expanded as described earlier.
Are there key issues, related to the specific technical report, that have not been considered?	Comparative analysis of cultural heritage landscape not discussed.  Better mapping would be useful of the larger study area.	The report response concluded that the area proposed for licensing retains only remnant landscape features. While important, the adjacent properties at 10315 Winston Churchill Boulevard and 10294 Heritage Road represent a more intact and complete nineteenth century settlement activities associated with the Curry family, an important pioneer local family.	As above. No expanded information on the impacts related to a haul route alternatives beyond 300 m. are offered. (Minor concern is CHL 6 is not identified on Figure 9. Page 44.)
<b>Mitigation/Monitoring</b>			

<p>Are realistic mitigation measures/ rehabilitation plans proposed in the applicant’s report? Is there sufficient detail?</p>	<p>2010- calls for general landscape buffering but does not reference other plan studies. No photo documentation of the site requested.</p>	<p>The report response concludes with recommendations for cultural landscape documentation in advance of site alterations. The report documents that collaboration between the heritage and visual technical studies.</p>	<p>A concern remains for the screening of the berms. The Landscape Peer Review member should comment this on aspect.</p>
<p>Do the proposed measures mitigate the impacts? Is the end result desirable from a technical point of view?</p>	<p>The consultant proposed mitigation measures however they are limited in their detail because the identified gaps in study area application exposes concerns in sections that are not considered There could be more specific reference to cultural heritage included in the design plan.</p>	<p>The report confirms that detailed mitigation measures are reflected in operational, vegetation management, and site rehabilitation plans.</p>	<p>Generally yes. A concern remains for the screening of the berms. The Landscape Peer Review member should comment this on aspect.</p>
<p>Will the proposed measures be adequate to address outstanding concerns?</p>	<p>Yes, for the area studied. More documentation required for the site prior to development.</p>	<p>As above.</p>	<p>The concerns regarding adequacy have been satisfactorily resolved. A documentation record of the site and surrounding area context prior to development is essential to enrich local history records.</p>
<p><b>Conclusion</b></p>			

<p>Do the conclusions satisfy the applicable policies of the relevant policy documents that need to be consulted as per the specific discipline (i.e.: Official Plan, Provincial legislation, standards and guidelines, etc....)? This should be informed by the policy matrix.</p> <p>Have implications relating to required jurisdiction and agency approvals including environmental assessments been identified?</p>	<p>The consultants have applied regulations and guidelines that are applicable. They generally satisfy the policies. Further research to be completed to see if the Standard and Guidelines for Historic properties is applicable.</p>	<p>The report has met the required regulations and guidelines.</p>	<p>The report did not confirm if the Standards and Guidelines for Historic Properties are applicable for property of significance located in the City of Brampton.</p>
<p>Are the conclusions relevant to the purpose/objectives and supported by the work undertaken by the report authors?</p>	<p>Yes for the 2010 HIA and the limited study area it reports on.</p>	<p>The report includes the additional data collection, more impact assessment, detailed mitigation, resulting in a fuller assessment of impacts within 300m of the area proposed for licensing.</p>	<p>Haul route assessment beyond the 300 m study area remains to be completed.</p>
<p>Based on the peer review, would the same conclusions be determined?</p>	<p>Value of cultural heritage resources on-site may be of greater heritage value and more mitigation would be required.</p>	<p>The report confirms the findings identified in the 2010 study.</p>	<p>While the larger comparative analysis may not effect the final evaluation under the municipal guidelines this actions merits</p>

			completion to verify the evaluation.
<b>Adequacy</b>			
Does the applicant’s report/study adequately address the stated purpose?	Yes, with some info gaps as stated above.	The report responded to all info gaps identified in the earlier peer review with exceptions.	Haul route info still deficient. Comparative assessment outside the 300 m study zone is recommended.
Is there anything that should, in your opinion, have been done differently?	Comparative analysis of the project site to other similar areas in Brampton and Halton Hills and an examination of the 120m and 300m off-site study area. Consultation directly with Brampton Heritage. A study of the off-site Haul Route is required.	The report completes a comparative analysis limited to within the 300 m area of the proposed licensing.	A larger comparative assessment study would have been completed to determine the rarity of the resource based on type, integrity and historical value. The haul route information is still deficient beyond 300 m. In other similar studies haul route using municipal or regional roads have been studied to measure the direct or indirect impacts.

**Conclusion Summary** (indicate in point form what overall conclusions are made on the technical report and identify issues to focus on).

- The revised document contains information that was initially missing in the 2008 and 2010 reports.

- The document has applied relevant legislation and guidelines for cultural heritage resources located within the 300 m buffer of the area proposed for licensing.
- The comparative assessment remains an issue. It is too narrow a data set to compare the value or significance of the cultural heritage resources only located in the 300 m study area.
- The larger haul route analysis remains to be completed.
- The general landscape enhancement plans may not be adequate according the City of Brampton Norval Peer Reviewer and the plan for cultural heritage resource impact mitigations measures should be reviewed by the discipline specialist.