September 14, 2026

To: Members of the Built Heritage Committee:

Councillor Rawlson King (chair), Councillor Stéphanie Plante (Vice-Chair), Councillor Clarke Kelly, Councillor Jeff Leiper, Councillor Ariel Troster, Member Brian Bourns, Member Christine Legault, Member James Maddigan, and Member Carolyn Quinn

(c/o Christopher Zwierzchowski, Committee Coordinator)

From: Guildwood Residents Alliance, ward 18

Dear Members of the Built Heritage Committee,

On behalf of the Guildwood Residents Alliance, representing the neighbourhood and community that include the 1495 Heron Road site, we wish to confirm that we do not oppose the proposed demolition of Buildings C and K on this site. We recognize that these areas of the site are required to accommodate the planned affordable housing component of the Build Canada Homes project. We reviewed the federal Building Condition Assessment, which indicates that rehabilitation costs for these structures would be prohibitive. In a publicly funded housing initiative, public value is a priority, and decisions must balance heritage conservation with the responsible use of public resources. In our view, the heritage character of the campus will be adequately preserved through the conservation of other designated buildings, building façades and interior courtyard in the core area of the campus, in accordance with the *Conservation Design Guidelines* issued on July 24, 2024 and revised September 5, 2024.

Jurisdictional problem

We hope that the Committee will correct the jurisdictional error contained in Recommendation 1 of Report ACS2026-PDB-RHU-0050 so that its deliberations remain consistent with its Terms of Reference approved by Council.

The Built Heritage Committee does **not** have the mandate or authority to recommend the approval of a concept plan under the *Planning Act.* The recommendation to Council that it "approve the 1495 Heron Road Concept Plan attached as Document 4, in principle" exceeds the scope of the Committee's delegated authority. Ensuring that this recommendation is amended will maintain proper procedural alignment and uphold the integrity of the Committee's heritage-focused mandate. Recommendation no. 1 should be amended to read:

"That the Built Heritage Committee recommend that Council:

1. **Approve the Application for demolition of the following buildings, in line with the 1495 Heron Road Concept Plan attached as Document 4, as may be revised from time to time:**

    a. **Demolition of Buildings C and K, conditional upon the submission of a Conservation Plan as outlined in this report."**

Concerning Recommendation 2, we suggest that the reference to the concept plan should be clarified so that any delegated authority under section 33 applies only to future heritage applications "**arising from the redevelopment described in** the Concept Plan, as may be revised from time to time…", and remains anchored in the *Ontario Heritage Act*. The highlighted wording above would bring the required clarity.

Challenges of Integrating MMC into a Heritage Site

Integrating Modern Methods of Construction (MMC) into a heritage-designated site such as 1495 Heron Road will present significant challenges. Research indicates that MMC depends on standardized, rapid, modular construction, while heritage legislation requires context-sensitive, conservation-driven design. A summary AI-assisted review of Canadian and international practice indicates that integrating Modern Methods of Construction into a municipally designated heritage site has no precedent in Canada. There appears to be no documented cases of modular or volumetric construction being deployed inside a legally protected heritage landscape.

This means that the redevelopment of 1495 Heron Road is not only innovative, it is precedent-setting and could become a national case study.

Regular monitoring by Built Heritage Committee

We are aware of the proposed delegation of authority outlined in Recommendation 2 of the staff report. However, the Conservation Design Guidelines for 1495 Heron Road were last amended on September 5, 2024 – one year before the Prime Minister of Canada announced, on September 14, 2025, that six federal sites across Canada – including 1495 Heron Road in Ottawa – would being prioritized for factory-built housing under the Build Canada Homes initiative. This means that the Guidelines currently in use were developed without any reference to Modern Methods of Construction (MMC) and without anticipating the integration of modular or volumetric construction within a heritage-designated landscape.

Given this context, it is unclear how the Built Heritage Committee will be kept informed of the progress, risks and implications associated with integrating MMC into a site whose heritage value is rooted in modernist architectural principles. Doesn't the Committee require information and updates on how Modern Methods of Construction will be adapted, constrained or modified to remain compatible with the character-defining elements of the campus – including massing and height of new

structures – and whether the emerging practices at 1495 Heron Road will be transferable to other modernist sites or buildings in this City that have a municipal heritage designation?

For these reasons, we believe the Committee should issue a “direction to staff” requiring regular reporting on the integration of MMC within the heritage landscape at 1495 Heron Road. Such reporting would ensure that the Committee remains informed as the project evolves, that delegated authority is exercised transparently, that the public is kept informed and that Council’s heritage oversight function is preserved. The reports would also provide valuable precedent-setting information for future Committee decisions involving other modernist buildings or landscapes in Ottawa that have a municipal heritage designation.

Furthermore, under the Built Heritage Committee’s Terms of Reference, we understand that any applicable comments from heritage planning staff and from the Committee itself would be transmitted to the appropriate decision-maker responsible for approving the final concept plan, in accordance with established procedure.

Thank you for the opportunity to make comments.

Best regards,

Lynne Davidson-Fournier
President, Guildwood Residents Alliance
Ward 18, Ottawa

Cc: Marty Carr, Councillor, Ward 18
Ms. Lesley Collins, Program Manager, Heritage Planning
Ms. Marcia Wallace, General Manager, PDBS
Ms. Mary Jarvis, Project Manager, BCH
Mr. James Ireland, Planner III, City of Ottawa