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### **PEER REVIEW: HERITAGE IMPACT ASSESSMENT FOR 276 STE. MARIE STREET APARTMENTS, TOWN OF COLLINGWOOD**

#### **1.0 OBJECTIVE**

This is a Peer Review of the *Heritage Impact Assessment, 276 Ste. Marie Street Apartments, Town of Collingwood, Ontario, Submitted to Shelley Wells, Plan Wells Associates*, by Golder Associates Ltd., October 17, 2018 ("Golder HIA"). The Town of Collingwood ("Town") forwarded the Golder HIA to Su Murdoch Historical Consulting ("heritage consultant") accompanied by the *Application for Zoning By-law Amendment & Site Plan Approval, 276 Ste. Marie Street* ("Planning Application") prepared by Plan Wells Associates on October 2018, Amended March 2019. The Golder HIA is a condition set by the Town for this zoning bylaw amendment and site plan approval application.

The primary objective of this Peer Review is to review the analysis of the Golder HIA in sufficient detail to consider the merit of its findings. As this peer reviewer is not a landuse planning specialist, only an overview of the Planning Application was conducted,

The property at 276 Ste. Marie Street is familiar to the heritage consultant because of a Peer Review conducted in December 2016 of the *Heritage Impact Assessment, Property Severance 276 Ste. Marie Street, Collingwood Downtown Heritage Conservation District, Town of Collingwood, Simcoe County, Ontario*, submitted to the Town by Golder Associates Ltd. on November 18, 2016.

#### **2.0 PROPERTY LOCATION**

This property, Part Lot 10, west side, Ste. Marie Street, Plan 144, is on the west side of Ste. Marie Street between Fourth and Hume. It is within the Downtown Collingwood Heritage Conservation District ("HCD") and subject to the provisions of the Downtown Collingwood Heritage

Conservation District Plan ("HCD Plan"), House Form category.

The Planning Application Executive Summary describes the property as "on the north-east quadrant of Ste. Marie and Fourth Street" and in 1.0 as the "north-west quadrant of Ste. Marie and Fourth Street. Golder HIA, 4.1, describes it as "on the east-central portion of a block bound to the north by Fourth Street East, Hume Street to the south, Ste. Marie Street to the east, and Hurontario Street to the west. The setting along Ste. Marie Street is described by Golder HIA, 5.1, as "characterized as an urban 'small town' streetscape, typified by one-to-two storey, single-detached brick buildings."

### **3.0 PROPERTY GOVERNANCE**

#### **3.1 ONTARIO HERITAGE ACT**

The Golder HIA and the Planning Application agree that this property is within the HCD, is subject to the HCD Plan, and is within the HCD Plan, House Form boundary. As stated in Golder HIA, 3.4.2, "It is important to note that in the event there is a conflict between the HCD Plan and other municipal by-laws, the HCD Plan takes priority."

Overall, the property must comply with the provisions of Part 5, Heritage Conservation Districts, of the Ontario Heritage Act ("OHA"). As such, a permit to alter the property is required under s. 42(1) of the OHA.

In Table 5, 5.1, *Objectives and Policies for Heritage Buildings*, item 3, "To apply the provisions of the Ontario Heritage Act to control the demolition or removal of a heritage building or structure," the Golder HIA assesses that the development proposal is "Compatible. The proposed development will retain the existing heritage structure, except for the rear wood-frame addition. Alteration to the rear addition will be subject to the approval by the Minister."

#### ***Peer Review Comment***

*To clarify the applicability of the OHA, the removal of the rear porch and deck, construction of an addition, and other physical changes constitute an alteration to a protected property and is subject to the requirements of s. 42(1) of the OHA. This permit process is embedded in the HCD Plan. Town Council issues a decision regarding the permit to alter application. An appeal by the owner to that decision is forwarded to the Local Planning Appeal Tribunal, which conducts a hearing and issues a binding decision.*

#### **3.2 OFFICIAL PLAN AND ZONING**

Figure 2, Golder HIA, labels the subject property as "*proposed* lot and study area boundary" and plots it within the boundary of By-law 2012-2020, Special Policy Area No. 2. The implication of being within Special Policy Area 2 is only briefly described in 3.4.3, Golder HIA:

Cultural resource management is sometimes addressed under Secondary Plans or other policies such as Master Plans. The property is not within a secondary plan area but is within Special Policy Area 2, passed as By-law 2012-020. This area encompasses the property and is exempt from several provisions in sections of the HCD Plan, primarily those concerned with the details of new construction.

In Golder HIA, 7.1, the zoning of the site is identified as “(H14) C1-4: Downtown Core Commercial - Exception 4. H14 signifies that the property is subject to an authorization by-law for a site plan control agreement.”

The Planning Application notes in 6.2 that “Schedule A – Land Use Plan to the Town of Collingwood Official Plan designates the subject Lands ‘Downtown Core Exception 3 (DC-3)’ ” and that “the DC-3 designation applies to the subject lands and the abutting former Admiral’s Village Lands.” The Planning Application delineates in 6.2 the “special development policies” that apply to this designation.

The Planning Application notes in 6.3 that “the subject lands are zoned Downtown Core Commercial-Exception 4 (C1-4) within the Town of Collingwood’s Zoning By-law 2010-040.” The implications of Exception 4 are outlined. There is no mention in the Planning Application of By-law 2012-2020 or Special Policy Area No. 2, as cited in the Golder HIA.

Planning Application, 1.0, explains, “From approximately 2006 to 2016, the subject site was incorporated as part of the Admiral’s Village development. On August 26, 2016, consent application D101016 was approved allowing the site to be severed, as the Admiral development was not going to proceed as planned.” Figure 2 of the Planning Application indicates the block between Hurontario, Hume, Ste. Marie, and below Fourth, is divided into three parcels: the 276 Ste. Marie site; the “Former Admiral Collingwood Place (now Monaco Phase 1)” on the west half, and the “Former Admiral’s Village (now Monaco Phase 2)” on the east half except for the 276 Ste. Marie parcel.

Seemingly in contrast to the information given in the text, the stated purpose of the Planning Application is for an amendment to Zoning By-law 2010-040:

The site specific C1-4 zone was placed on the subject lands in conjunction with the abutting lands to the south, to facilitate the Admiral’s Village development. As previously noted, this development did not proceed, and the applicant severed his lands 2016. The current C1-4 zoning is not relevant to the standalone site and an amendment to the Town of Collingwood Zoning By-law 2010-40 is required to allow the proposed development to proceed. It is proposed to re-zone the subject lands to the Downtown Core Commercial Zone, with exceptions for rear yard setback and building height.

**Peer Review Comment**

*This peer reviewer is not a landuse planning specialist and may not fully comprehend zoning provisions in place for this property. Neither the Golder HIA nor the Planning Application provide a comprehensive checklist of what planning parameters are specific and current to this property. This inhibits the ability of the peer reviewer to apply accurately a framework with which to assess compliance of the proposed development. Clarification on which provisions/parameters are applicable is needed before this Peer Review can be finalized.*

*In the interim and with the knowledge that the HCD Plan takes priority over any conflict with a municipal bylaw, this Peer Review defers to the provisions of the HCD Plan, House Form category, as being relevant to the subject property.*

**4.0 PROPOSED DEVELOPMENT****4.1 DESCRIPTION OF PROPOSED DEVELOPMENT**

The Golder HIA states in 7.1 Development Description:

Bay Haven [Bay Haven Nursing Home] proposes to:

- Develop a 4-storey, 18.75 m long (east to west) by 8.85 m wide (north-south) addition to the existing structure with:
  - New red brick and mortar cladding to match existing house
  - Flat roof with rooftop balcony
  - Ground floor parking; and,
  - Symmetrical fenestration with tempered glass balconies from the second level to rooftop
- Renovate the exiting heritage structure with:
  - An apartment in the attic space lit by four Velux roof windows on the north and south façade;
  - An additional white painted, double hung wood windows on the south façade
- Construct a 2.05 m long (east to west) by 6.086 wide (north-south) red brick clad passage to separate the rear addition with the existing heritage structure, which will:
  - Provide access to ground floor parking through one exterior door on the north elevation
- Landscaping plan has not yet been developed.

Elsewhere, the Golder HIA indicates that the existing rear porch and deck will be removed. The Proposed Development Renderings are contained in Appendix B, Golder HIA.

#### **4.2 GOLDER HIA CONCLUSION**

In Table 5, 5.2, *Objectives and Policies for New Construction and Development*, item 3, “To ensure that new construction and development complement the District,” the Golder HIA concludes:

The addition will be located to the rear of the existing heritage building, ensuring it retains prominence in the streetscape. A visual separation has been created between the existing heritage building and the proposed addition, which will further ensure the development complements the HCD. The proposed development is compatible in terms of form, alignment, height, massing, architectural features (symmetrical fenestration), colour schemes and materials (red brick, wooden windows).

In Table 5, 5.3, *Townscape Features*, the Golder HIA finds the proposed development “Compatible”:

The proposed development will restore the heritage character of the streetscape by retaining the existing heritage building and constructing a compatible rear addition which uses similar colour schemes, architectural features and materials.

Other statements regarding the perceived compatibility of the proposed development with the HCD Plan are made throughout the Golder HIA.

### **5.0 PEER REVIEW ANALYSIS OF PROPOSED DEVELOPMENT**

#### **5.1 OVERALL DESIGN AND MASSING**

The subject property is within the House Form boundary of the HCD. As such, it is subject to HCD Plan, 14.3 *New Construction: House Form*, which preambles with the following statement:

The overall principles for new construction of commercial buildings apply, with some modification, to new construction in the House Form areas of the District. The design guidelines for the category of House Form address general characteristics, as well as common and uncommon elements that contribute to the overall heritage character of this part of the District.

Throughout the Golder HIA and the Planning Application the design of the proposed 4 storey, flat roof addition is defended principally in the context of the future 5 and 6 storey developments on the now vacant Admiral Collingwood/Monaco parcels of land abutting at the south and southwest.

Golder HIA, 5.1, states, “To the immediate south of the property is a vacant lot which will be redeveloped with a six-storey condominium building known as Admiral Collingwood Place (Figure 10).” Figure 10 shows a vacant lot. No conceptual renderings or materials specifications for this proposed development are provided. The Golder HIA, Table 4, Shadows, contends:

The height of the development is minor in comparison to the proposed development immediately adjacent and will be an appropriate transition from the commercial Hurontario Street to the more residential portion of the Ste. Marie Street. The rear addition may cast some shadows but is not predicted to adversely impact the heritage attributes of adjacent properties.

There is no indication that a Shadow Study was conducted.

The Golder HIA, Table 4, Isolation, states:

The existing heritage structure at 276 Ste. Marie will be retained to ensure prominence from the street. No significant surrounding environmental elements, context or relationship were identified. The proposed rear addition will act as a moderate density transition between single family dwellings to the east and north, and the six-storey proposed development to the immediate south of the property.

### **Comment**

*As shown in Elevations 2, Appendix B, Golder HIA, the 4 storey addition will be clearly visible looking west or southwest toward the property from Ste. Marie. There seems to be only cursory analysis of the visual impact of this new feature on a section of Ste. Marie identified in Golder HIA, 5.1, as “an urban ‘small town’ streetscape, typified by one-to-two storey, single-detached brick buildings.” The consideration of the property as an element within the HCD House Form boundary seems to be secondary.*

*Instead, the justification for a 4 storey, flat roof addition is being assessed in the context of the anticipated high rise development on the now vacant south abutting lands and any future development on Hurontario Street to the west. The addition has been assigned the role of a transition structure between these potentials, and the existing, low rise built form along Ste. Marie.*

*Neither the Golder HIA nor the Planning Application confirm the status of the approval process and/or construction start date for the south lands. There is no indication of development plans for the Hurontario side. No renderings are provided to illustrate the intended built form or materials of the south development, therefore, there is nothing provided against which to compare or evaluate the appropriateness of the design of the proposed addition in that future context. If that*

*south development design were to change, could the addition at No. 276 become an orphan with an incompatible design and lacking in purpose as a transition structure?*

## **5.2 HEIGHT**

The intent is to erect a “4-storey, 18.75 m long (east to west) by 8.85 m wide (north-south) addition to the existing structure.” In Table 5, 14.1, *General Principles for New Construction*, item 1, the Golder HIA assesses the proposed development as follows:

Compatible: The proposed development incorporates similar colour schemes and materials (e.g. red brick painted wood windows) and architectural features (e.g. symmetrical fenestration). The addition is located to the rear of the existing heritage property to ensure its prominence on the streetscape and will not exceed the maximum building height.

The HCD Plan principle against which the height is being assessed is 14.1, *General Principles for New Construction*, which reads:

The design of a new building, or an addition, does not need to replicate historic design model to be compatible with the HCD. Attention to the form, alignment, height, massing, setback, architectural features, colour schemes, and materials can result in a design that maintains the architectural rhythm of the neighbouring buildings and streetscape, and thus the heritage character of the District.

This wording in the Golder HIA is transposed from the HCD Plan as follows:

The design of a new building, or an addition, does not need to replicate historic design model to be compatible with the HCD. Attention to the form, alignment, setback, architectural features, colour schemes, and materials can result in a design that maintains the architectural rhythm of the neighbouring buildings and streetscape, and thus the heritage character of the District.

Of note is that the Golder HIA omits the HCD Plan words “height” and “massing” from the text of that principle. The Golder HIA also adds a sentence that is not in the HCD Plan, as follows:

On these lands the maximum building height permitted is four storeys plus an additional storey for mechanical penthouses and amenity spaces.

The source of this statement is not the HCD Plan. There are minor variations elsewhere in the transposing of the “Town HCD Design Guidelines” to Table 5 of the Golder HIA.

Regarding permissible height for new construction, 14.0 of the HCD Plan states:

The HCD Plan sets the objectives and principles to be applied when undertaking new construction. The Town’s zoning bylaw sets the numeric measurements for such parameters as setback and height. When in conflict, the provisions of the HCD Plan prevail over the zoning bylaw.

HCD Plan, 14.2, *New Construction: Commercial Core* (to which the zoning amendment application aspires) states:

There is no requirement to replicate; far more important is the similarity of a new building to its orientation, setback, height, massing, bay width, roofline, materials, and alignment to the neighbouring properties.

Under the heading of Height and Massing, 14.2 of the HCD Plan states, in part:

- Height must be established based on surrounding context and streetscape analysis.
- The total height measured from grade to the highest point of the roof, excluding any tower or ornamentation, must be equal to or be an average of the neighbouring heritage buildings; or in default, be equal to the general standard of the District.
- The massing within the determined height must reflect the traditional composition of two or three storeys, with each storey aligned with or complementary to the neighbouring buildings. Some variation in rooflines, such as through the use of a variety of parapet or cornice styles, is encouraged.
- The allowable height is as stated in the Town’s zoning bylaw.

**Comment**

*As noted in 3.2 of this Peer Review, consideration of other zoning parameters, apart from the HCD Plan, was set aside until these are confirmed by the Town.*

*If the principle of the HCD Plan to establish height “based on surrounding context and streetscape analysis,” with the upper limit established by the Town’s zoning bylaw, is applied, the maximum height of new construction on this property would likely not exceed two storeys.*

*Of concern is that the Golder HIA uses the proposed development on the Admiral Collingwood/Monaco lands, and potential for future development on Hurontario Street, as justification for the height (as well as the form and massing) of the addition. As stated, neither the*



*Golder HIA nor the Planning Application confirm the status of the approval process and/or construction start date for those lands, and no renderings are provided. The context of the HCD Plan House Form category seems to be a secondary consideration.*

### **5.3 MATERIALS AND PASSAGEWAY**

The Golder HIA contends that the use of “new red brick and mortar cladding to match existing house” will integrate the addition with the heritage dwelling, thereby reducing some of the negative impact resulting from the new construction.

A flat roofed link or passageway is proposed for the area between the rear of the dwelling and the start of the addition. The purpose of the passageway is noted in Table 5, 10.5, *General Guidelines*, which outlines “common guidelines” for the conservation of cultural heritage. These are not drawn from the HCD Plan. Item 3, of this section states “the passageway between the existing building and new addition will provide a visual separation.”

#### **Comment**

*An acceptable mitigation strategy option when proposing an addition to a heritage resource is to match the existing architectural elements, including the type and colour of the building materials and old to new design elements, while ensuring that the main structure maintains prominence. This implies that the addition is to appear to be lesser in scale and design. The HCD Plan advocates this option, without requiring new construction to replicate existing.*

*Based on the Proposed Development Renderings in Appendix B, Golder HIA, it is evident that if the 4 storey structure with a flat roof is approved, the use of matching materials will hardly be sufficient to mitigate the visual impact of the addition. As evident in Elevations 2, Appendix B, it will loom above the rear of the dwelling when viewed from the east or north at Ste. Marie. The view from the south likely will be obliterated if the south development is completed.*

*It is agreed that the use of a passageway tucked under the eaves at the rear maintains the four-sided definition of the truncated roof of the dwelling. The removal of the existing porch and deck to construct the passageway is of no consequence. These elements are not original and not visible from the streetscape. This positive initiative differs in intent from the Golder HIA contention that the inset of a passageway between the rear of the dwelling and the addition is sufficient to ensure the continued “prominence” of the dwelling. The passageway has no design relationship to the dwelling. Even with a passageway, the 4 storey, flat roofed addition will be an intruding backdrop to the dwelling. Looking west from Ste. Marie, the passageway will not be visible.*

### **5.4 FENESTRATION AND BALCONIES**

Elevations 2, Appendix B, Golder HIA, indicate the adding of two roof windows on the east (front) façade. Only the adding of roof windows on the north and south facades is identified in Golder

HIA, 7.1, and depicted in Elevations 1, Appendix B. No roof windows on any façade are depicted in Appendix C, Planning Application. As such, the actual intent regarding the roof windows is unknown.

The addition of one “white painted, double hung wood windows on the south façade” (Golder HIA, 7.1) is proposed. Of note is that this window addition is depicted on Elevations 1, Appendix B, Golder HIA, but is not depicted in Appendix C, Planning Application.

The use of “symmetrical fenestration with tempered glass balconies from the second level to rooftop” is proposed. The sanction given in Golder HIA, Table 5, 10.5, *General Guidelines* (not drawn from the HCD Plan) is that the symmetrical fenestration complies with the principle that “additions must maintain the original character of the building, the balance of composition and the traditional relationship to the surroundings.”

The use of tempered glass is assessed in Golder HIA, Table 5, 14.3, *New Construction: House Form: Exterior Finish* regarding the principle “Combinations of materials when a similar heritage example can be documented in the District.” The Golder HIA finds tempered glass “Compatible. Although tempered glass balconies are proposed, this material has been accepted by the Town in other recent developments.”

#### **Comment**

*It is recommended that the use of roof windows on the east and north facades be avoided as these modern elements are not in keeping with the Edwardian Classicism style of the dwelling and will be visible from Ste. Marie.*

*The addition of one double hung window on the south façade is of no consequence, assuming it is matched and aligned to existing. The renderings in the Planning Application should be corrected to indicate this proposed change.*

*The contention that the “symmetrical fenestration” is a positive and compatible initiative has no substance given the dramatic difference in the massing, style, form, and height of the addition compared to the dwelling.*

*The Golder HIA reference to seeking other examples of a material within the HCD to justify the tempered glass for the balconies is a misinterpretation of the wording. The HCD Plan states this provision applies when a similar heritage example can be documented in the HCD.*

## **5.5 ROOF**

The proposal is for a flat roof with a roof top balcony.

In Table 5, 14.3, *New Construction: House Form – Appropriate Materials, Roofs*, the Golder HIA assesses that “the proposed development has a flat roof to ensure the existing heritage building

remains prominent.”

**Comment**

*The justification for the use of a flat roof to give prominence to the heritage dwelling ignores the principle under House Form Area – Inappropriate Materials, Roofs: which lists both “slopes or layouts not suitable to the architectural style” and “low sloped or flat roofs” as inappropriate.*

*The principle of giving prominence to an existing heritage structure is more complex than choosing a contrasting design. The successful integration of old and new relies on employing compatible design principles and forms, whatever age. In this case, the key element of concern for compatibility is the roof type.*

## **5.6 INTERIOR RENOVATION**

Much of the Golder HIA is devoted to an analysis of the interior of the dwelling. It should be noted that Part 5 of the HCD is prohibited from considering interiors of structures within a HCD.

## **5.7 PARKING**

The Golder HIA, Table 5, 5.3 *Townscape Features*, item 8, states, “parking is located to the rear of the building.” The renderings in Appendix B, Golder HIA, seem to indicate that the doors to the ground level parking are along the north façade of the addition.

**Comment**

*As the view of the south façade of the addition likely will be obliterated by development on the south abutting lands, it is recommended that the doors to the ground level parking be on the south façade. This will present an opportunity for landscaping on the north façade that is in keeping with this residential stretch of Ste. Marie.*

## **5.8 LANDSCAPING PLAN**

Golder HIA advocates for the development of a landscape plan.

**Peer Review Comment**

*It is recommended that the intent of this landscape plan be to reinforce the separation of the dwelling from any addition that is not compatible in design with the heritage dwelling. The reasoning for this approach is explained in 6.0 of this Peer Review.*

## **6.0 CONCLUSION**

As indicated, in the absence of any definitive direction as to what zoning parameters may otherwise have been approved by the Town for development of this property, this Peer Review applied the provisions of the HCD Plan for a property within the House Form boundary. The Golder HIA seems to waver in its analysis between the provisions of the HCD Plan and other potential zoning parameters.

Under any provisions or parameters, this Peer Review is skeptical of the analysis by the Golder HIA that leads to the conclusion that the design, massing, height, and architectural elements of the proposed 4 storey, flat roofed addition are compatible with the existing Edwardian Classicism dwelling and/or with this section of the Ste. Marie streetscape. It somehow finds compatibility in what are essentially polar opposite designs.

This Peer Review does agree with the Golder HIA that the physical impact on the historic fabric of the heritage building will be minimal, if limited to the removal of the rear porch and deck, addition of one period window, and if the proposal for roof windows on the north and east facades is eliminated. This does not address the negative visual impact on the property, its dwelling, and the context of the Ste. Marie streetscape resulting from the proposed height and design of the addition.

**If the Town choses to permit the 4 storey, flat roof addition**, there is some merit to the Golder HIA suggestion that the addition has a greater role and relationship to the context of the potential 5 and 6 storey development on the Admiral Collingwood/Monaco lands, and the unknown future development at Hurontario Street. It could serve as the transition property between the high rises to the south and southwest, potentially Hurontario, and the low rise, residential streetscape to the north and east. The shortcoming of the Golder HIA in presenting this argument is that the south complex does not exist and no confirmation of final approval, construction schedule, or renderings of the to be built design or materials specifications are provided for comparison. Hurontario to the west is currently low rise and no development seems pending.

If there were an approved, soon to be built, design in place for the Admiral Collingwood/Monaco lands, a suggestion would be to match the addition in form and materials to that complex, not the dwelling. In this way, the addition might visually group or orient to the south complex and visually disconnect from the heritage dwelling, lessening the visual impact on Ste. Marie.

A passageway designed in the traditional manner, using historic materials and design elements, could give the illusion when viewed from the north that it is a rear tail or extension of an Edwardian Classicism style dwelling. This design approach to the passageway would increase the visual separation between the rear of the dwelling and the 4 storey addition. It could reinforce the prominence and traditional setting of a heritage dwelling on a residential streetscape.

The proposed 4 storey, flat roof backdrop to a truncated roofed dwelling may continue to be visually problematic.

The overall intent of this approach would be that, at a glance, one might consider that the addition is not linked to the heritage property but is an extension of the south complex. The risk is that if the south development does not proceed in the anticipated manner, the addition could be a design orphan.

**If the Town does not permit the 4 storey height and/or the proposed design for the addition,** some increase in density may still be possible through the HCD Plan, House Form provisions. The key component would be to match the roof of the addition with the truncated roof type of the dwelling. The intent would be to create a design that gives prominence to the heritage dwelling as the entrance feature within a larger, design-integrated complex. In this scenario, matching the red brick and mortar, window type and alignment, roof type, etc., and possibly using an Edwardian Classicism inspired passageway could help visually bind the assembly.

This Peer Review recognizes that the HCD Plan is not intended to block new development within the HCD. It agrees with the provincial intensification strategy, as referenced in the Golder HIA, but it needs to be noted that this strategy is not meant to be at the cost of the character and quality of established neighbourhoods.

It is recommended that the comments of this Peer Review be considered as the Town and property owners continue to seek a creative design solution to integrating the proposed development into the HCD.

Yours truly,

A handwritten signature in black ink, appearing to read 'S. Murdoch', with a stylized, cursive script.

Su Murdoch, B.A., CAHP