

Intention to Designate under Part IV, Section 29 of the Ontario Heritage Act - 100 Simcoe Street

Date: November 9, 2020

To: Toronto Preservation Board

Toronto and East York Community Council

From: Senior Manager, Heritage Planning, Urban Design, City Planning

Wards: Ward 10 - Spadina-Fort York

SUMMARY

This report recommends that City Council state its intention to designate the property at 100 Simcoe Street under Part IV, Section 29 of the Ontario Heritage Act. The property was included on the City of Toronto's Heritage Register on March 9, 2017.

Located on the west side of Simcoe Street between Pearl and Adelaide streets in the King-Spadina neighbourhood, the property contains an early-20th century industrial complex with Edwardian Classical styling that was constructed in two phases and originally occupied by Rolph and Clark Limited (forerunners to Rolph-Clark-Stone Limited), lithographers, graphic designers and stationery manufacturers. In its setting with the neighbouring heritage buildings on King, Adelaide, Duncan and Pearl streets, the Rolph and Clark Limited Building anchors the eastern area of King-Spadina.

Following further research and evaluation, it has been determined that the property meets Ontario Regulation 9/06, which sets out the criteria prescribed for municipal designation under Part IV, Section 29 of the Ontario Heritage Act, for its design/physical, historical/associative and contextual value.

The Province and the City's policies seek the conservation of cultural heritage resources. Designation supports conservation as it enables City Council to review alterations to the site, enforce heritage property standards and maintenance, and refuse demolition.

RECOMMENDATIONS

The Senior Manager, Heritage Planning, Urban Design, City Planning recommends that:

1. City Council state its intention to designate the property at 100 Simcoe Street under Part IV, Section 29 of the Ontario Heritage Act, in accordance with the Statement of Significance: 100 Simcoe Street (Reasons for Designation) attached as Attachment 3 to the report, November 9, 2020, from the Senior Manager, Heritage Planning, Urban Design, City Planning.
2. If there are no objections to the designation in accordance with the Ontario Heritage Act, City Council authorize the City Solicitor to introduce the necessary bill in Council.
3. If there are objections in accordance with the Ontario Heritage Act, City Council direct the City Clerk to refer the proposed designation to the Conservation Review Board.
4. If the designation is referred to the Conservation Review Board, City Council authorize the City Solicitor and appropriate staff to attend any hearing held by the Conservation Review Board in support of Council's decision to designate the property.

FINANCIAL IMPACT

There are no financial implications resulting from the adoption of this report.

DECISION HISTORY

The property at 100 Simcoe Street was identified as a contributing property in the Heritage Inventory for the King-Spadina Heritage Conservation District (HCD) Draft Plan which was released for public comment on October 25, 2016:

<https://hcdtoronto.wordpress.com/2016/10/25/king-spadina-hcd-plan-draft>

In November 2016, Heritage Preservation Services presented an overview of the King-Spadina HCD Plan to the Toronto Preservation Board.

The property at 100 Simcoe Street was included on the City of Toronto's Heritage Register on March 9, 2017.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.TE22.18>

The property at 100 Simcoe Street was identified as a contributing heritage property in the final King-Spadina HCD plan adopted by Council at its October 2, 2017 meeting (currently under appeal).

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.TE26.14>

BACKGROUND

Heritage Planning Framework

The conservation of cultural heritage resources is an integral component of good planning, contributing to a sense of place, economic prosperity, and healthy and equitable communities. Heritage conservation in Ontario is identified as a provincial interest under the Planning Act. Cultural heritage resources are considered irreplaceable and valuable assets that must be wisely protected and managed as part of planning for future growth under the Provincial Policy Statement (2020) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020). Heritage Conservation is enabled through the Ontario Heritage Act. The City of Toronto's Official Plan implements provincial policy regime, the Planning Act, the Ontario Heritage Act and provides policies to guide decision making within the city.

Good planning within the provincial and municipal policy framework has at its foundation an understanding and appreciation for places of historic significance, and ensures the conservation of these resources are to be balanced with other provincial interests. Heritage resources may include buildings, structures, monuments, and geographic areas that have cultural heritage value or interest to a community, including an Indigenous community.

The Planning Act establishes the foundation for land use planning in Ontario, describing how land can be controlled and by whom. Section 2 of the Planning Act identifies heritage conservation as a matter of provincial interest and directs that municipalities shall have regard to the conservation of features of significant architectural, historical, archaeological or scientific interest. Heritage conservation contributes to other matters of provincial interest, including the promotion of built form that is well-designed, and that encourages a sense of place.

The Planning Act requires that all decisions affecting land use planning matters shall conform to the Growth Plan and shall be consistent with the Provincial Policy Statement, both of which position heritage as a key component in supporting key provincial principles and interests.

<https://www.ontario.ca/laws/statute/90p13>

The Provincial Policy Statement provides policy direction on land use planning in Ontario and is to be used by municipalities in the development of their official plans and to guide and inform decisions on planning matters, which shall be consistent with the Provincial Policy Statement. The Provincial Policy Statement articulates how and why heritage conservation is a component of good planning, explicitly requiring the conservation of cultural heritage and archaeological resources, alongside the pursuit of other provincial interests. The Provincial Policy Statement does so by linking heritage conservation to key policy directives, including building strong healthy communities, the wise use and management of resources, and protecting health and safety.

Section 1.1 Managing and Directing Land Use to Achieve Efficient and Resilient Development states that long-term economic prosperity is supported by, among other considerations, the promotion of well-designed built form and cultural planning, and the conservation of features that help define character. Section 2.6 Cultural Heritage and Archaeology subsequently directs that "significant built heritage resources and significant cultural heritage landscapes shall be conserved". Through the definition of conserved, built heritage resources, cultural heritage landscape and protected heritage property, the Provincial Policy Statement identifies the Ontario Heritage Act as the primary legislation through which heritage conservation will be implemented.

<https://www.ontario.ca/page/provincial-policy-statement-2020>

A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020) builds on the Provincial Policy Statement to establish a land use planning framework that supports complete communities, a thriving economy, a clean and healthy environment and social equity. Section 1.2.1 Guiding Principles states that policies in the plan seek to, among other principles, "conserve and promote cultural heritage resources to support the social, economic, and cultural well-being of all communities, including First Nations and Metis communities". Cultural heritage resources are understood as being irreplaceable, and are significant features that provide people with a sense of place. Section 4.2.7 Cultural Heritage Resources directs that cultural heritage resources will be conserved in order to foster a sense of place and benefit communities, particularly in strategic growth areas. Strategic growth areas include the downtown urban growth centre where this property is located.

<https://www.ontario.ca/document/place-grow-growth-plan-greater-golden-horseshoe>

The Ontario Heritage Act is the key provincial legislation for the conservation of cultural heritage resources in Ontario. It regulates, among other things, how municipal councils can identify and protect heritage resources, including archaeology, within municipal boundaries. This is largely achieved through listing on the City of Toronto's Heritage Register, designation of individual properties under Part IV of the Ontario Heritage Act, or designation of districts under Part V of the Ontario Heritage Act.

Section 27 of the Ontario Heritage Act gives municipalities the authority to maintain and add to a publicly accessible heritage register. The City of Toronto's Heritage Register includes individual heritage properties that have been designated under Part IV, Section 29, properties in a heritage conservation district designated under Part V, Section 41 of the Act as well as properties that have not been designated but City Council believes to be of "cultural heritage value or interest."

Ontario Regulation 9/06 sets out the criteria for evaluating properties to be designated under Part IV, Section 29 of the Ontario Heritage Act. The criteria are based on an evaluation of design/physical value, historical and associative value and contextual value.

<https://www.ontario.ca/laws/statute/90o18>
<https://www.ontario.ca/laws/regulation/060009>

The City of Toronto's Official Plan contains a number of policies related to properties on the City's Heritage Register and properties adjacent to them, as well as the protection of areas of archaeological potential. Indicating the integral role that heritage conservation plays in successful city-building, Section 3.1.5 of the Official Plan states that, "Cultural heritage is an important component of sustainable development and place making. The preservation of our cultural heritage is essential to the character of this urban and liveable City that can contribute to other social, cultural, economic and environmental goals of the City."

Policy 3.1.5.4 states that heritage resources on the City's Heritage Register "will be conserved and maintained consistent with the Standards and Guidelines for the Conservation of Historic Places in Canada, as revised from time to time and adopted by Council." Policy 3.1.5.6 encourages the adaptive re-use of heritage properties while Policy 3.1.5.26 states that, when new construction on, or adjacent to, a property on the Heritage Register does occur, it will be designed to conserve the cultural heritage values, attributes and character of that property and will mitigate visual and physical impacts on it.

<https://www.toronto.ca/city-government/planning-development/official-plan-guidelines/official-plan/>

<https://www.historicplaces.ca/media/18072/81468-parks-s+g-eng-web2.pdf>

Heritage Impact Assessments (HIA) will be required for development applications that affect listed and designated properties. An HIA shall be considered when determining how a heritage property is to be conserved.

The Ontario Heritage Toolkit also provides guidance on designating properties of municipal significance. The Tool Kit provides direction on the purpose of designating heritage properties for identifying and protecting places in our communities that have cultural heritage value and is an important part of planning for the future, and of helping to guide change while keeping the buildings, structures and landscapes that give each of our communities its unique identity.

COMMENTS

The original staff report recommending that the property at 100 Simcoe Street be added to the City of Toronto's Heritage Register was adopted by City Council at its March 9, 2017 meeting. Following further evaluation to determine the merit of the property for designation under Part IV, Section 29 of the Ontario Heritage Act, the content of the 2017 report is deemed still to be valid and the site unchanged since that time.

ROLPH AND CLARK LIMITED BUILDING, 100 SIMCOE STREET
Research and Evaluation according to Ontario Regulation 9/06



Photos of the property at 100 Simcoe Street (Rolph and Clark Limited Building, showing the 1904 south section and east elevation along Simcoe Street (top), and the 1905 north section adjoining Adelaide Street (bottom) (Heritage Planning, 2020)

1. DESCRIPTION

100 SIMCOE STREET – ROLPH AND CLARK LIMITED BUILDING	
ADDRESS	100 Simcoe Street (west side between Pearl and Adelaide streets) ¹
WARD	Spadina-Fort York
LEGAL DESCRIPTION	Plan 223E, Part Block C
NEIGHBOURHOOD/COMMUNITY	King-Spadina
HISTORICAL NAME	Rolph and Clark Limited Building
CONSTRUCTION DATE	1904 (north section); 1905 (south section) ²
ORIGINAL OWNER	Clark Lithographing Company (south section); Rolph and Clark Limited (north section)
ORIGINAL USE	Industrial
CURRENT USE*	Commercial * This does not refer to permitted use(s) as defined by the Zoning By-law
ARCHITECT/BUILDER/DESIGNER	G. W. Gouinlock, architect (south section); Sproatt and Rolph, architects (north section)
DESIGN/CONSTRUCTION/MATERIALS	Brick cladding with brick and stone detailing
ARCHITECTURAL STYLE	See Section 2
ADDITIONS/ALTERATIONS	See Section 2
CRITERIA	Design/Physical, Historical/Associative & Contextual
HERITAGE STATUS	Listed (March 2017)
RECORDER	Heritage Planning: Kathryn Anderson (2017 report) Liz McFarland
REPORT DATE	November 2020

2. BACKGROUND

This research and evaluation section of the report describes the history, architecture and context of the property at 100 Simcoe Street, and applies evaluation criteria as set out in Ontario Regulation 9/06, under the headings of historical/associative, design/physical and contextual value to determine whether it merits designation under Part IV, Section 29 of the Ontario Heritage Act. The application of the criteria is found in Section 3 (Evaluation Checklist). The conclusions of the research and evaluation are found in the Conclusion of the report. Maps and Photographs are located in Attachment 1. The archival and contemporary sources for the research are found in Attachment 2. The Statement of Significance is contained in Attachment 3.

¹ The property has convenience addresses at 90 Simcoe Street, 130 Pearl Street, and 203 Adelaide Street West

² The Rolph and Clark Limited Building is labelled "South Section" and "North Section" on the atlas attached as Image 5

i. HISTORICAL TIMELINE

Key Date	Historical Event
1832	Upper Canada College (UCC) opens its first campus on King Street West, west of Graves (Simcoe) Street, where it remains until 1891 (Images 2 and 6)
1846	Thomas Brown establishes a bookbinding business in Toronto as the forerunner to Brown Brothers Limited
1849	Rolph, Smith and Company, lithographers, is founded in Toronto
1902	With the relocation of UCC to Deer Park, its former campus is subdivided under Plan 223E (Image 7)
1902	The Clark Lithographing Company is established in Toronto
1903 Sept	Architect George Gouinlock is “receiving tenders for a large warehouse on the corner of Pearl and Adelaide streets for the “Clark Lithographic Company” according to the Canadian Contract Record ³
1903	The subject property remains vacant on Goad’s Atlas (Image 4)
1904 Feb	The Clark Lithographing Company is issued a building permit for a three-storey warehouse on the northwest corner of Simcoe and Pearl streets, and a building is under construction by April (Image 8) ⁴
1904 Mar	Leonard Foulds purchases the subject property from UCC’s executors
1904 Apr	The Great Fire destroys Toronto’s manufacturing centre where Rolph, Smith and Company’s business is located
1904 May-June	The Clark Lithographing Company merges with Rolph, Smith and Company as Rolph and Clark Limited
1904 July	Rolph and Clark Limited is issued a building permit for a warehouse at Simcoe and Adelaide streets, with Sproatt and Rolph identified as the architects (Image 8)
1904 Aug	An “unfinished building” occupies the south end of the property at 100 Simcoe Street according to the tax assessment rolls
1904 Oct	Foulds sells the property at 100 Simcoe to Rolph and Clark Limited, followed by adjoining land in December 1904
1905 Jan	Rolph and Clark Limited are listed in the City Directory on Simcoe Street between Pearl and Adelaide streets
1905 Aug	The tax assessment rolls identify Rolph and Clark Limited as the owners and occupants of two buildings on Simcoe Street with a collective value of \$67,000
1906 Jan	The City of Toronto Directory contains a full-page advertisement illustrating Rolph and Clark’s new complex (Image 9)
1912	The subject property is included on the update to Goad’s Atlas (Image 12)
1912	Rolph and Clark Limited purchase additional land on Adelaide Street from UCC’s executors, as well as property on Carlaw Avenue for a new manufacturing facility

³ Canadian Contract Record, September 23, 1903, 3

⁴ 100 Years of Lithographing and Printing, unpagged

1913	Brown Brothers Limited, bookbinders and stationery manufacturers, purchase the property at 100 Simcoe Street and rent the north building to stationers Blackwell and Company
1936	Brown Brothers' complex is illustrated in an advertising brochure (Image 12)
1943	Revisions to the Underwriters' Survey Bureau's 1921 atlas show the building while it is occupied by Brown Brothers Limited (Image 5)
1951	Wilfred Gordon acquires the subject property and leases the premises to a series of tenants
1952-1962	The subject property is owned by One Hundred Simcoe Limited and, in 1956, an application is made to alter the main (east) entrance
1982	Famous Players Realty Limited acquires the subject property and submits plans for alterations, including the entrance on the east elevation and a two-storey interior atrium and skylight
2012	City Council authorizes the study of the King-Spadina neighbourhood as a potential Heritage Conservation District (HCD) under Part V of the Ontario Heritage Act, with the property at 100 Simcoe Street included within the study boundaries
2016	The King-Spadina HCD Plan [Draft] is released, identifying 100 Simcoe Street as a contributing heritage property
2017 March	The property is included on the City's Heritage Register
2017 Oct.	The King-Spadina HCD is approved by Council and designated under Part IV, Section 29 of the Ontario Heritage Act (currently under appeal); 100 Simcoe Street is identified as a contributing property within the HCD boundary

ii. HISTORICAL BACKGROUND

The following section outlines the history and facts related to the property which are the basis for determining 'Historical and Associative Value' according to O. Reg. 9/06 Criteria.

King Spadina Neighbourhood:

The property at 100 Simcoe Street is located in the King-Spadina neighbourhood, which is named for the main cross-roads of King Street West and Spadina Avenue. Following the founding of York (Toronto) at the end of the 18th century, the Military Reserve was established between the town site and the Humber River, with (Old) Fort York guarding the entrance to the harbour. The rapid growth of the community led to its westward expansion to the edge of the Military Reserve, creating a "New Town" In 1797. West of Simcoe (originally Graves) Street, large squares were created for the Third Parliament Buildings and Upper Canada College's inaugural campus. Following the incorporation of the City of Toronto in 1834, parts of the Military Reserve were sold and the area subdivided for residential development. The introduction of the first steam railways in the century witnessed tracks extending across the former Military Reserve, followed by early small-scale industries.

The Great Fire of 1904, which destroyed the city's manufacturing district adjoining Front and Bay streets, resulted in the transformation of the King-Spadina neighbourhood from a predominantly residential and institutional enclave to an industrial area. The removal (at the end of the 19th century) of the provincial legislature and Upper Canada College from King-Spadina provided significant tracts of land for the large-scale factories and warehouses that characterized the area prior to World War II. After the latter conflict, many industries relocated to Toronto's suburbs, leaving buildings vacant or underutilized. The revitalization of the King-Spadina neighbourhood is largely credited to famed businessman Edwin "Honest Ed" Mirvish who restored the landmark Royal Alexandra Theatre in the 1960s and converted many of the neighbouring warehouses to restaurants as the nucleus of the "Entertainment District." This led to the transformation during the 1970s and 1980s of industrial buildings for commercial uses. The adoption of the King-Spadina Secondary Plan in 1996 lifted the restrictive industrial zoning, encouraging the adaptive reuse of former industrial buildings. Today, the regeneration of King-Spadina as a sought-after mixed-use community continues where part of the neighbourhood has been identified and studied as a potential Heritage Conservation District.⁵

The historical development of the King-Spadina can be traced on archival maps and atlases, including those attached in Section 6 of this report.

100 Simcoe Street:

The property at 100 Simcoe Street is located at the east end of the King-Spadina neighbourhood on land originally subdivided for Russell Square, Upper Canada College's first campus. After the boys' school moved to Deer Park in 1891, representatives of the University of Toronto (which formed the College's Board of Governors) rented out the premises to various businesses before registering a plan of subdivision in 1902. Two years later, Leonard Foulds, a local architectural draftsman, acquired two parcels on the west side of present-day Simcoe Street, which he immediately conveyed to the new lithography company of Rolph and Clark Limited.

The development of 100 Simcoe Street is linked to the Great Fire of April 19, 1904 when T. J. Clark, founder in 1902 of the Clark Lithographing Company, was constructing a new facility on the subject property to manufacture lithographed labels.⁶ He arranged to complete urgent orders from one of his rivals, the Rolph and Smith Company, whose premises were destroyed in the inferno.⁷ Headed in 1904 by Frank Rolph, the latter enterprise was one of the oldest lithography establishments in Toronto (with origins dating to the mid-19th century) and among the first to produce business stationery in Canada.⁸ After working together, the two companies decided to create a

5 In 2012, City Council authorized the study of King-Spadina as a potential Heritage Conservation District for Part V designation under the Ontario Heritage Act. The HCD Study was prioritized in 2014, with the King-Spadina HCD Plan [Draft] released two years later

6 Lithography is a printing process invented at the end of the 18th century to reproduce artwork and text
7 Evidently the building permits were issued and construction of the complex began before the land was legally transferred to Rolph and Clark

8 Founded in 1873 by English watercolorist J.T. Rolph, his brother Frank Rolph and partner David Smith, the company took over the existing business and premises of Ellis and Company, engravers (*100 Years of Lithographing and Printing*, unpagged)

“multiple service graphics arts house” and “with the new plant [on Simcoe Street] nearing completion, a merger was arranged and Rolph and Clark was formed.”⁹

Following its amalgamation in 1904, Rolph and Clark immediately extended the company's complex north to Adelaide Street West. The north section of the building was completed by August 1905 when it was recorded in the tax assessment rolls. Rolph and Clark Limited used a full-page advertisement in the City Directory of 1906 to illustrate the complex (Image 9). While “the new building, one of the most spacious and modern plants of its type on the continent, had been considered too big for the company by some sceptics in the trade”, Rolph and Clark Limited soon outgrew the facility and relocated to a larger manufacturing complex in the east end of Toronto in 1912.¹⁰ Five years later, the company amalgamated with Stone Limited, lithographers specializing in calendars and advertising, as Rolph-Clark-Stone Limited.¹¹

The property at 100 Simcoe Street was acquired in 1915 by Brown Brothers Limited, which was “one of the city’s most prominent bookbinders, manufacturing stationers, and dealers in bookbinders’ and printers’ supplies.”¹² Founded in 1856 by bookbinder Thomas Brown, the company relocated to a custom-built facility on Wellington Street West that was destroyed in the Great Fire of 1904. After purchasing Rolph and Clark Limited’s Simcoe Street facility, Brown Brothers Limited expanded its product lines (including leather goods and fountain pens) and, with its continued success, rented additional space in King-Spadina and New Toronto before moving to an expansive complex in East York in 1951.¹³ During the latter year, 100 Simcoe was transferred to Wilfred Gordon “in trust for a company to be incorporated.”¹⁴ The property was leased to a series of businesses, including printers and publishers, until 1982 when it was purchased by Famous Players Realty Limited. The current owners acquired 100 Simcoe Street in 1985.

Architects, 100 Simcoe Street:

The Clark and Rolph Limited Building was designed in two phases by Toronto architect G. W. Gouinlock (south section, completed 1904) and the architectural partnership of Sproatt and Rolph (north section, completed 1905).

In 1903, the Clark Lithographing Company engaged Toronto architect G. W. (George Wallace) Gouinlock to design its new warehouse at 100 Simcoe Street. Gouinlock opened a solo practice in 1889 and first received local recognition six years later as the winner of a competition for the Temple Building, the North American headquarters of the Independent Order of Foresters (IOOF) on Bay Street, which was completed in 1897 as the tallest building in the British Empire. Gouinlock designed the first of many warehouses and factories in the up-and-coming King-Spadina neighbourhood when he worked in partnership with F. S. (Francis Spence) Baker between 1899 and 1902.¹⁵

9 *100 Years of Lithographing and Printing*, unpagged

10 *100 Years of Lithographing and Printing*, unpagged

11 Rolph and Clark’s complex at 201 Carlaw Avenue is designated under Part IV, Section 29 of the Ontario Heritage Act, along with Stone Limited’s manufacturing facility at 461 King Street West

12 Brown Brothers Limited, City of Toronto Archives, Fonds 1141, unpagged

13 Brown Brothers was sold to an American company in 1972 and closed 25 years later

14 Land Registry Office, Plan 223E, Block C, Instrument 33841, November 1951

15 Located at 461 King Street West, the property is designated under Part IV, Section 29 of the Ontario Heritage Act

Among the pair's clients was the Toronto Lithography Company, which may have led to Gouinlock's commission for 100 Simcoe Street. The latter project was commenced when Gouinlock was working as a solo practitioner and prior to his appointment in 1906 as the official architect for the Canadian National Exhibition. Gouinlock remains best known for this role, whereby he reorganized the exhibition grounds after a disastrous fire and designed 15 new buildings for the property, five of which were designated by the federal government as National Historic Sites. The architect remained in practice until the 1930s and the City of Toronto's Heritage Register contains many of his landmark buildings, including the Birkbeck Building (1910, a National Historic Site and current headquarters of the Ontario Heritage Trust) on Adelaide Street East, and the Ontario Hydro-Electric Power Commission's administration building (1915, and now part of Princess Margaret Hospital) on University Avenue.

The new firm of Rolph and Clark Limited commissioned an extension to its facility at 100 Simcoe Street while the south section was under construction. The project was undertaken by Henry Sproatt (1866-1934) and Ernest Rolph (1871-1958) who, in 1901, had established "one of the most important architectural partnerships in Canada after 1900."¹⁶ Rolph had a personal connection to 100 Simcoe Street as the son of Frank Rolph, co-founder with T. J. Clark of Rolph and Clark Limited.¹⁷ While Sproatt and Rolph received other commissions in the King-Spadina neighbourhood, including the Southam Press Building (1909) at 19 Duncan Street, the firm remains best remembered for landmark buildings such as Hart House at the University of Toronto (1919, and famed for popularizing the Collegiate Gothic style in Canada) and Eaton's College Street Store (1930, in association with Ross and Macdonald). Among Sproatt and Rolph's later designs was the Ontario Hydro-Electric Power Commission's offices (1935) on University Avenue, which also adjoins an earlier building designed by G. W. Gouinlock.

iii. ARCHITECTURAL DESCRIPTION

The following section provides an architectural description and analysis related to the property which will establish the basis for determining 'Design and Physical Value' according to O. Reg. 9/06 Criteria.

Current photographs of the property at 100 Simcoe Street are found on the cover and in Sections 2 and 6 of this report. The Rolph and Clark Limited Building displays features of Edwardian Classicism that, "with a selective distribution of strong Classical elements, provided a transitional style from 19th century eclecticism to the 20th century Beaux-Arts Classicism."¹⁸ As the most popular style for commercial, residential and industrial buildings in the pre-World War I era, the distinctive elements of Edwardian Classicism are displayed on the Rolph and Clark Limited Building with its sombre red brick cladding, the symmetrical placement of the door and window openings, and the detailing in stone and brick derived from classical architecture. As shown in the illustration and archival photographs attached as Images 9, 11 and 12, the Rolph and Clark Limited Building was designed with the classical organization of the base, body

16 "Ernest Ross Rolph," entry in <http://www.dictionaryofarchitectsincanada.org/node/579>, unpagged

17 Ernest Rolph's brother, Frank A. Rolph, became the company's president in 1949

18 Blumenson, 166

and cornice. The original oversized cornice with brackets, as well as the cornice separating the third and fourth floors were removed (as shown in Image 13, dating to 1973).

The two-part complex is organized into south (1904) and north (1905) sections that share rectangular-shaped plans, red brick cladding with brick and stone detailing, and a flat roof (where the original cornice, visible in Images 9, 11 and 12, was removed in the late-20th century). The south section extends eight bays on Simcoe Street (east) and six bays on Pearl Street (south) with a canted southeast corner (the original entrance, seen in Images 9, 12 and 13, was recently converted to a window opening, with the addition of an entrance in the southernmost bay on the east elevation). On the principal (east) and south elevations, the bays contain single flat-headed window openings with stone labels in the first, second and fourth floors and segmental-arched window openings with brick voussoirs and stone keystones in the third storey. As a compatible, yet distinguishable addition in the late-20th century, the fifth storey features regular and oversized segmental-arched openings with brick and stone detailing that reflect the historical fenestration and are aligned with the bays below. On the east elevation, an entrance is found in the eighth bay from the south end while, on the south wall, some of the openings are placed according to the original interior layout (refer to cover photograph on page 6).

The north section of the complex runs four bays on both Simcoe and Adelaide streets and repeats the fenestration from the south section. However, it is distinguished from the earlier construction by the pairs of window openings in each bay (apart from the single bay at the west end of the north wall). The entrance on the north wall was modified in the late 20th century (an archival photograph attached as Image 10 shows it circa 1911). The west elevation is concealed by the adjoining parking garage.

iv. CONTEXT

The following section provides contextual information and analysis related to the property which is the basis for determining 'Contextual Value' according to O. Reg. 9/06 Criteria.

The maps attached as Image 1 show the location of the property at 100 Simcoe Street. The Rolph and Clark Limited Building is located on the west side of Simcoe Street where it extends along the block between Pearl Street (south) and Adelaide Street West (north). The property at 100 Simcoe Street anchors the east end of the King-Spadina neighbourhood and, with its vantage point on Adelaide Street West, offers a strong introduction to the collection of factory and warehouse buildings that characterized the early-20th century development of the area.

Directly south, the Union Building (1907) at 212 King Street West is designated under Part IV, Section 29 of the Ontario Heritage Act, along with the adjoining warehouses between Simcoe Street and John Street.¹⁹ West of the property at 100 Simcoe Street,

¹⁹ The block also contains the Royal Alexander Theatre (1907) at 260 King and the Princess of Wales Theatre (1993) at 300 King, which are designated under Part IV, Section 29 of the Ontario Heritage Act

the early-20th century former factories and warehouses around the intersection of Duncan and Pearl streets are also recognized on the City's Heritage Register, along with the Canadian Magazine Company Building (1913) at 200 Adelaide Street West. The latter sites are all identified as contributing properties in the King-Spadina HCD Plan (2017).

3. EVALUATION AND APPLICATION OF O.REG 9/06 CRITERIA

The following evaluation applies Ontario Regulation 9/06 made under the Ontario Heritage Act: Criteria for Determining Cultural Heritage Value or Interest. The criteria are prescribed for municipal designation under Part IV, Section 29 of the Ontario Heritage Act, and the City of Toronto also uses these criteria when assessing properties for inclusion on the City of Toronto Inventory of Heritage Properties. There are three categories for a total of nine criteria under O. Reg 9/06. A property is only required to meet one criteria to warrant designation. As demonstrated below, the property at 100 Simcoe Street meets several criteria amongst the three categories.

The evaluation table is marked “N/A” if the criterion is “not applicable” to the property or X if it is applicable to the property, with explanatory text below.

DESIGN OR PHYSICAL VALUE

Design or Physical Value	
i. rare, unique, representative or early example of a style, type, expression, material or construction method	X
ii. displays high degree of craftsmanship or artistic merit	N/A
iii. demonstrates high degree of scientific or technical achievement	N/A

Representative example of a style and type

The Rolph and Clark Limited Building is valued for its design as a representative example of Edwardian Classicism, which was popular for industrial and other building types in the pre-World War I era. The subject building displays the features of the style, with the sombre red brick surfaces, the symmetrical fenestration, and the classical organization and detailing that (according to archival images) originally included elaborate cornices. The complex was updated in the late-20th century with the addition of the fifth storey, which complements the original sections of the building with the brickwork and the segmental-arched window openings that reflect the historic fenestration.

HISTORICAL OR ASSOCIATIVE VALUE

Historical or Associative Value	
i. direct associations with a theme, event, belief, person, activity, organization or institution that is significant to a community	X
ii. yields, or has the potential to yield, information that contributes to an understanding of a community or culture	X
iii. demonstrates or reflects the work or ideas of an architect, artist, builder, designer or theorist who is significant to a community	X

Yields information that contributes to an understanding of a community or culture

The property at 100 Simcoe Street is valued historically for its contribution to the development, evolution and regeneration of the King-Spadina neighbourhood during the 20th century. The area changed from an institutional enclave adjoined by residential subdivisions to Toronto's new manufacturing district after the Great Fire of 1904, which led to the merger of two leading Toronto lithography companies that occupied and expanded the industrial building at 100 Simcoe Street. Although King-Spadina declined after World War II with the departure of many industries to Toronto's suburbs, it was revived in the 1960s when entrepreneur Edwin "Honest Ed" Mirvish restored the Royal Alexandra Theatre and adapted the neighbouring early-20th century warehouses for restaurants. In the late 1980s, the property at 100 Simcoe Street was converted from industrial to commercial uses as part of the ongoing regeneration of King-Spadina.

Direct association with an organization that is significant to a community

The cultural heritage value of the Rolph and Clark Limited Building is also through its historical association with significant businesses in King-Spadina. After the Great Fire of 1904 destroyed the premises of the Rolph, Smith and Company, it merged with the rival Clark Lithographing Company as Rolph and Clark Limited and completed the complex at 100 Simcoe Street. Rolph and Clark Limited left King-Spadina in 1912 ((prior to the company's amalgamation with lithographers Stone Limited as Rolph-Clark-Stone Limited) and sold the subject property to Brown Brothers Limited. For the next 40 years, Brown Brothers Limited operated its bookbindery and business stationery company at 100 Simcoe Street.

Demonstrates or reflects the work or ideas of an architect, artist, builder, designer or theorist who is significant to a community

The Rolph and Clark Limited Building's historical value is also through its links to important Toronto architects. Famed practitioner G. W. Gouinlock received the commission for the south section of the building at 100 Simcoe Street after designing the headquarter of the Toronto Lithography Company (1901), a designated heritage property at 461 King Street West. The Rolph and Clark Limited Building reflected Gouinlock's ability to design high-end classically-inspired buildings, a skill that contributed to his subsequent role as official architect of the Canadian National Exhibition where he oversaw the early-20th century reorganization of the grounds with more than a dozen new structures, including several commemorated as National Historic Sites. The north section of the Rolph and Clark Limited Building was completed by the notable Toronto architectural partnership of Sproatt and Rolph as an early

example of the firm's work. While Sproatt and Rolph had a personal connection to the project (Ernest Rolph was the son of Rolph and Clark Limited's co-founder), it demonstrated the architects' dexterity in the design of a complementary yet distinguishable extension to the complex, and prefaced Sproatt and Rolph's success in designing other industrial edifices in King-Spadina and landmark buildings throughout Toronto.

CONTEXTUAL VALUE

Contextual Value	
i. important in defining, maintaining or supporting the character of an area	X
ii. physically, functionally, visually or historically linked to its surroundings	X
iii. landmark	N/A

Important in defining, maintaining or supporting the character of an area

Character - Contextually, the property at 100 Simcoe Street has value through its support for the historical character of the King-Spadina neighbourhood where it is part of an important collection of former factories and warehouses that changed the area from its origins as an institutional and residential district to Toronto's new manufacturing centre following the Great Fire of 1904 and, in the late-20th century, evolved into a commercial hub and the city's Entertainment District. With its location on Simcoe Street, the Rolph and Clark Limited Building anchors the east end of the King-Spadina neighbourhood.

Physically, functionally, visually or historically linked to its surroundings

The Rolph and Clark Limited Building is historically and visually linked to its setting on the west side of Simcoe where it extends along the block from Pearl Street to Adelaide Street West. The property at 100 Simcoe Street forms part of an enclave of surviving early-20th century industrial buildings northwest of King and Simcoe streets, including the collection of former factories and warehouses on King Street West between Simcoe and John streets and on Duncan Street, north of King, which are recognized on the City of Toronto's Heritage Register.

CONCLUSION

Staff have completed the Research and Evaluation Report for the property at 100 Simcoe Street and determined that the property meets Ontario Regulation 9/06, the criteria prescribed for municipal designation under Part IV, Section 29 of the Ontario Heritage Act under all three categories of design, associative and contextual values.

The property at 100 Simcoe Street is valued as an early-20th century industrial complex with Edwardian Classical styling that is historically linked to the development, evolution and regeneration of the King-Spadina neighbourhood, as well as to noted Toronto architects G. W. Gouinlock and Sproatt and Rolph and companies connected with

graphic arts and design and the bookbinding and stationery industries. While the Rolph and Clark Limited Building complex was enlarged in the late-20th century, the property at 100 Simcoe Street retains its integrity and embodies its cultural heritage values and attributes.

Contextually, the Rolph and Clark Limited Building supports the unique character of King-Spadina where, in its setting with the neighbouring heritage buildings on King, Adelaide, Duncan and Pearl streets, it anchors the east end of the area.

The Statement of Significance (Attachment 3) for 100 Simcoe Street comprises the Reasons for Designation, which is the Public Notice of Intention to Designate.

CONTACT

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SIGNATURE

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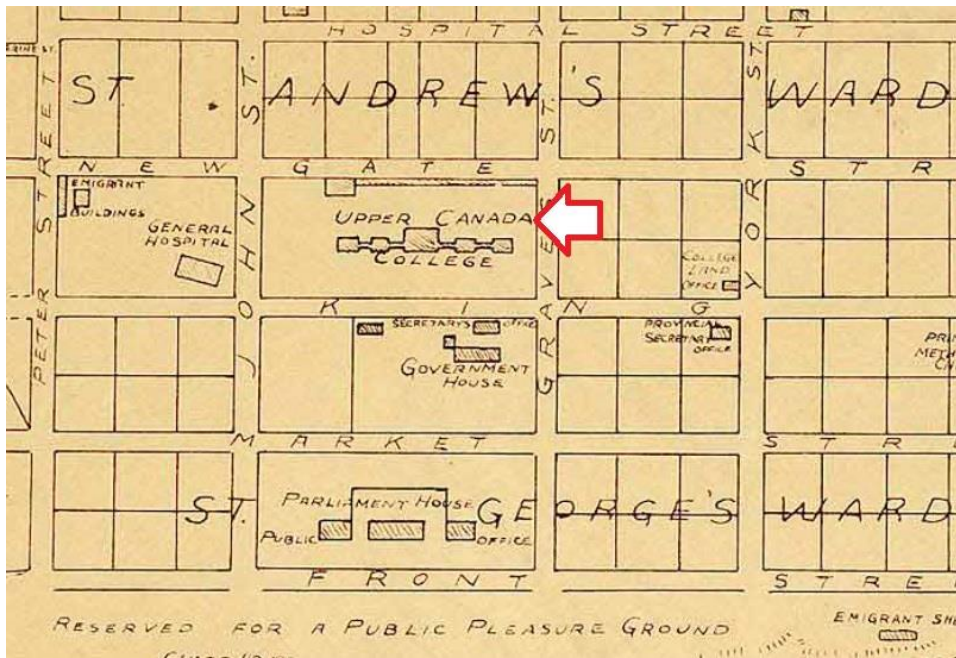
ATTACHMENTS

Attachment 1 – Maps and Photographs
Attachment 2 – List of Research Sources
Attachment 3 – Statement of Significance (Reasons for Designation) 100 Simcoe Street

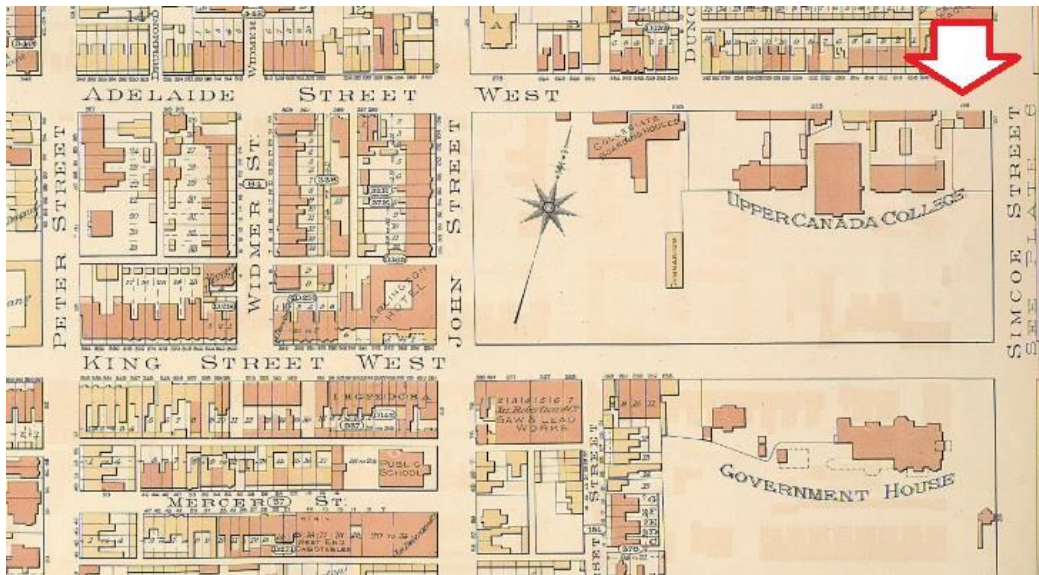


1. Location Maps: showing the location of the subject property on the west side of Simcoe Street between Pearl (south) and Adelaide Street West (north). The aerial photograph (below) is oriented with north on the bottom and looks south toward Roy Thomson Hall (City of Toronto Property Data Map and www.bing.ca/maps).

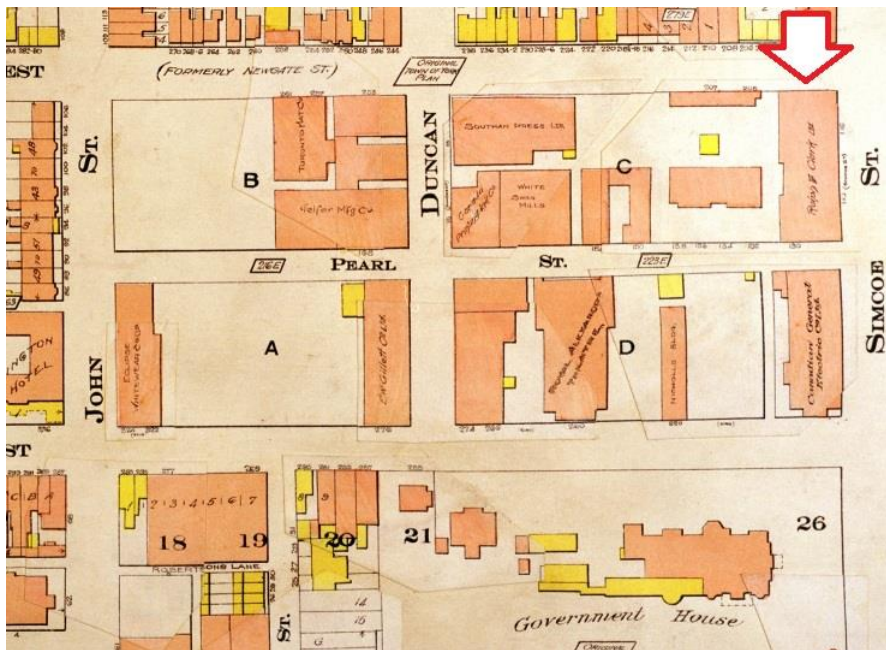
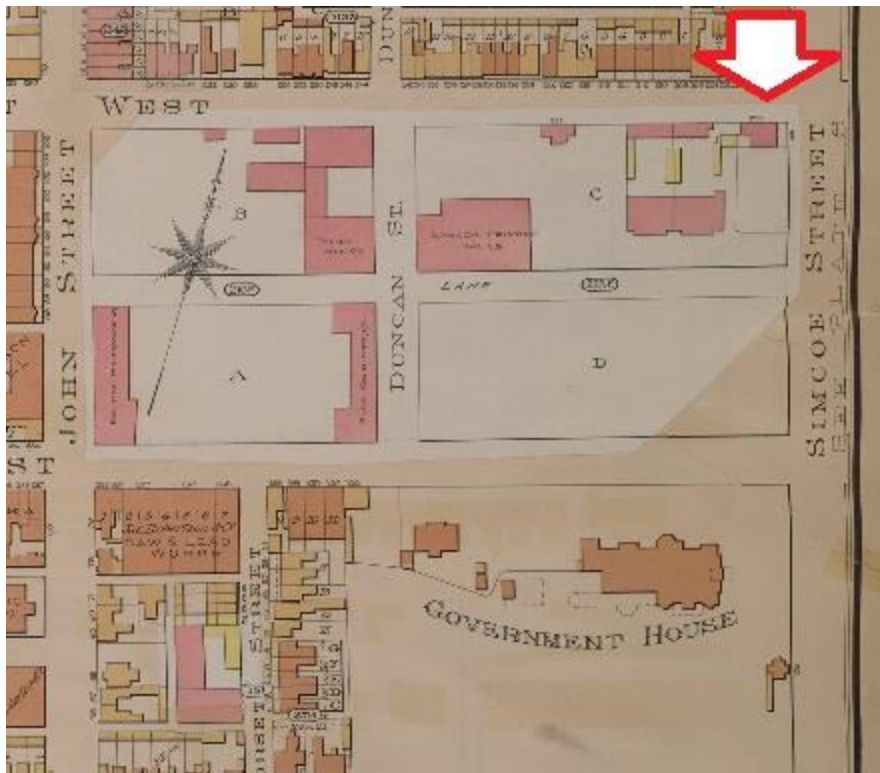
Please note: all maps are oriented with north at the top, unless otherwise indicated



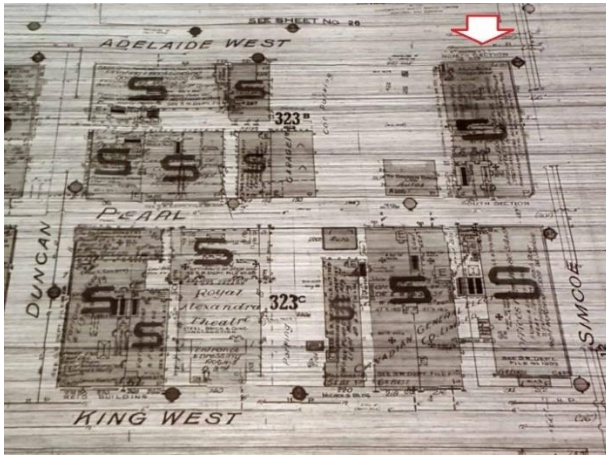
2. Map, Bonnycastle and Tazewell, 1834: showing the subject property occupied by the original campus of Upper Canada College



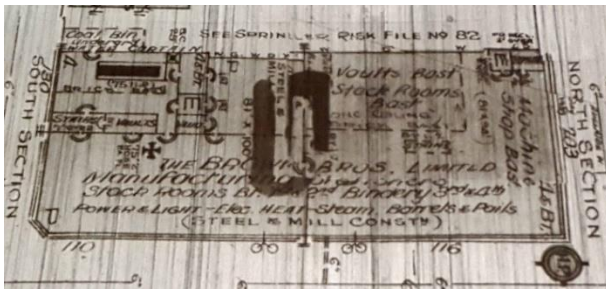
3. Goad's Atlas, 1890: Upper Canada College is illustrated prior to the subdivision of the lands for industrial development.



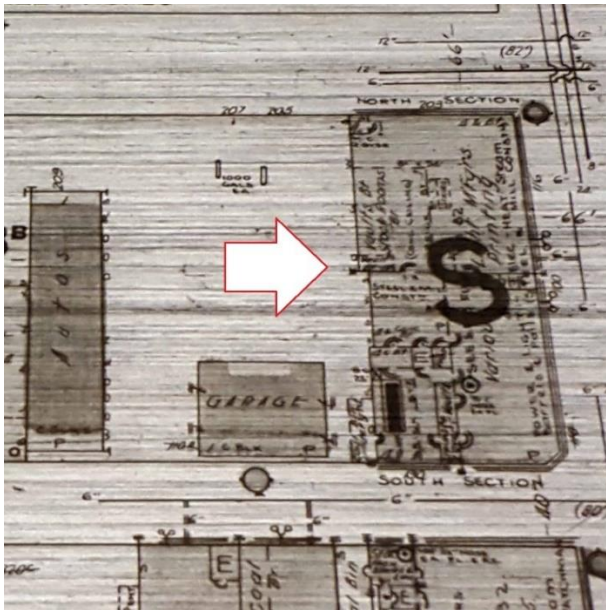
4. Goad's Atlas, 1903 (above) and 1910 revised to 1912 (below): showing the subject property prior to and after the construction of the subject building, as well as the development of the adjoining King-Spadina neighbourhood with industrial buildings.



1921 revised 1943



1921 rev 1943 (detail, with north on the right)



1954 revised 1964

5. Underwriters' Survey Bureau Atlases, 1921 revised to 1943 (above) and 1954 revised to 1964 (below): showing the subject property when it was occupied by Brown Brothers Limited, followed by light manufacturing.



6. Archival Photograph, Russell Square, 1890: looking east from the Upper Canada College to Simcoe Street prior to the relocation of the institution (Toronto Public Library, Image 2331).



7. Plan 223E, 1902: showing the subdivision of the former Upper Canada College Campus at Russell Square where the subject property was developed afterward on part of Block C (Land Registry Office, Toronto).

BUILDING PERMIT.

Permit No. 8

Toronto, **FEB - 9 1904** 189

Permission is hereby granted to

Passed by The Clark Lithographic Co

Address Louisa St

for the Three storey Warehouse

Stone & rich steel columns

& rams

h. w. cor of Simcoe St

John Peter St

Architect Lot # 40 000

Limit - a Water # 8

BUILDING PERMIT

No. 862

Plan No. _____

Lot No. _____

Toronto, **JUL 11 1904** 190

Permit granted to

Mr Ralph Clark

To erect a Three Storey Brick & Stone Warehouse

on Cor of Simcoe & Adelaide Sts

Architect Sprague & Ralph

Builder H. Martin

Cost of Building, \$ 30 000

Plans and Specifications approved by _____

City Architect

No. of Block Plan _____

Limit a Water, \$ metered

8. Building Permits, 100 Simcoe Street, 1904: issued for the construction of the north and south parts of the complex.

ROLPH AND CLARK
 LITHOGRAPHERS
 ENGRAVERS STATIONERS
 DIE SINKERS EMBOSSERS

TORONTO
 COR. SIMCOE, PEARL & ADELAIDE STS.

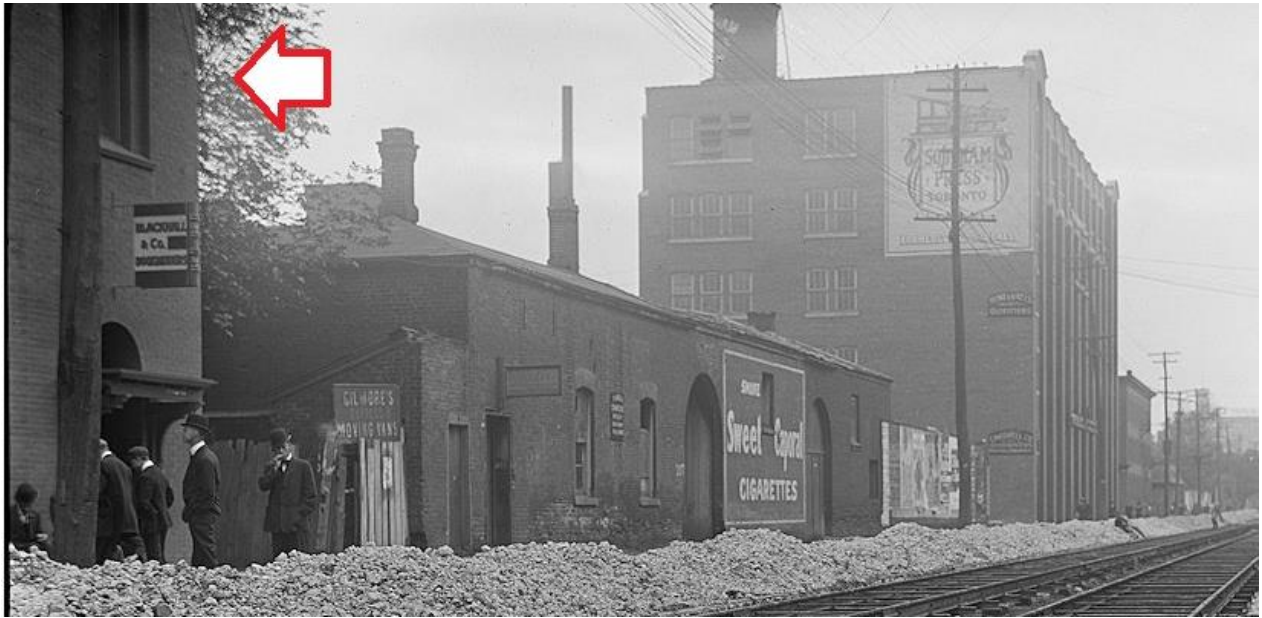
BILL HEADS, LETTER HEADS, ENVELOPES,
 NOTE PAPER, BUSINESS CARDS, CHEQUES,
 STOCK CERTIFICATES, DEBENTURES, BONDS,
 NOTES, DRAFTS, PHAMPLETS, CIRCULARS.

FOLDERS, SEALS, INVITATION CARDS, CRESTS,
 VISITING CARDS, MEDAL DIES, BOOK PLATES,
 MAPS, PLANS, LABELS, HANGERS, CALENDARS,
 POSTERS, SHOW CARDS, STREET CAR SIGNS.

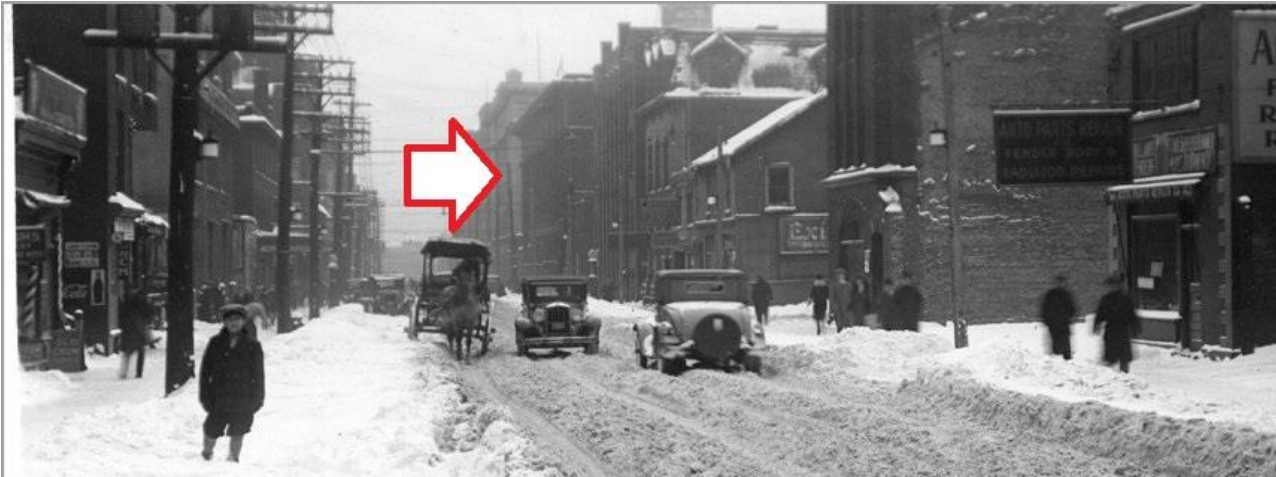
WE ARE AGENTS FOR
**NATIONAL
 SAFETY
 PAPER**



9. Advertisement, City of Toronto Directory, January 1906: showing Rolph and Clark's newly completed complex at 100 Simcoe Street.



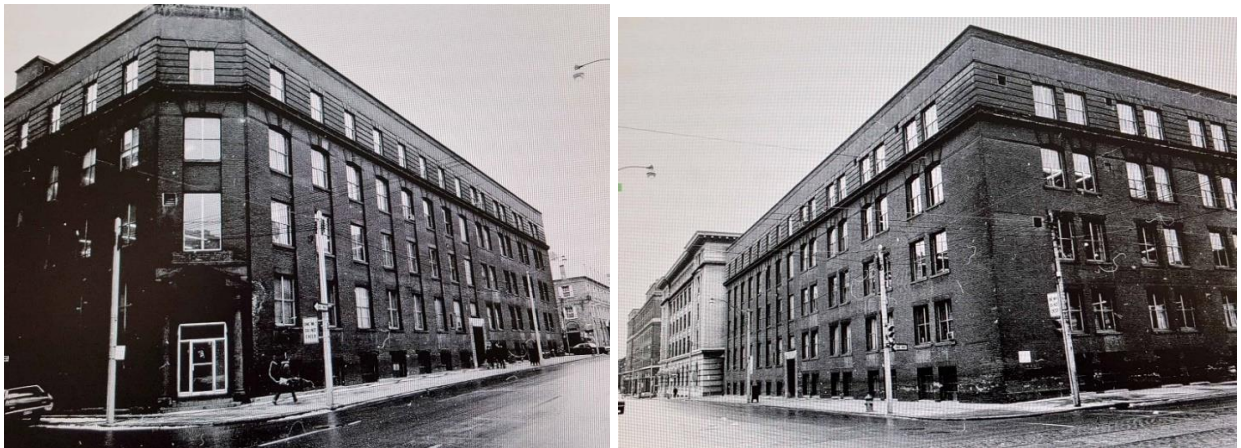
10. Archival Photograph, 100 Simcoe Street, circa 1911: view looking west on Adelaide Street West from Simcoe Street showing the north entrance to Rolph and Clark Limited's complex on the left (City of Toronto Archives, Series 372, Item 48).



11. Archival Photograph, 100 Simcoe Street, 1929: Clark and Rolph Limited's complex with the cornice is shown in this view looking south on Simcoe Street from Richmond Street West (City of Toronto Archives, Series 71, Item 7335).



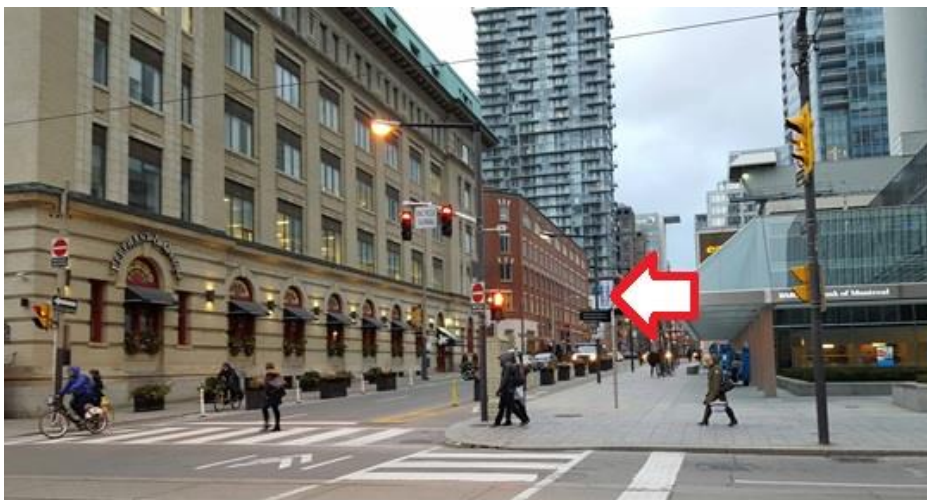
12. Archival Photograph, 100 Simcoe Street, 1936: showing the property during its long-term occupancy by Brown Brothers Limited (catalogue image reproduced in Foder).



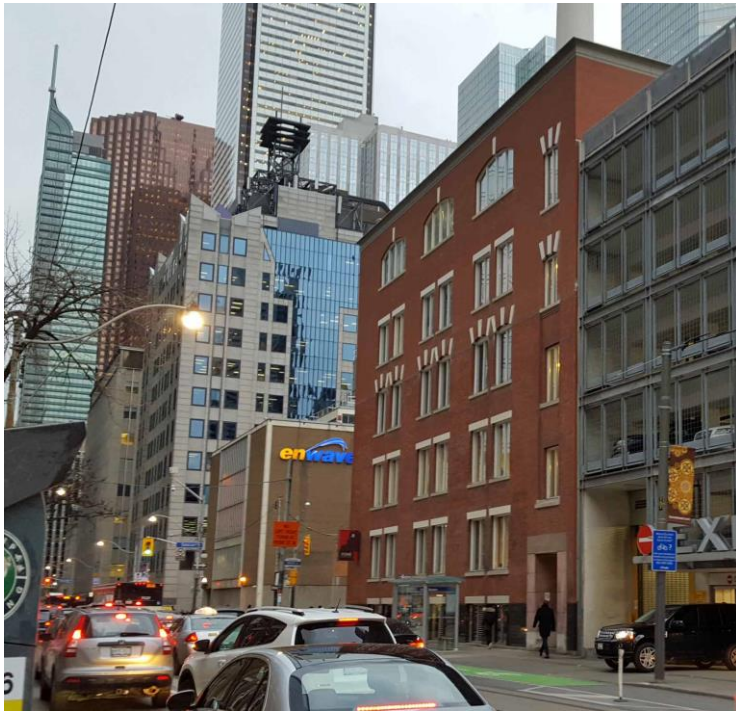
13. Archival Photographs, 100 Simcoe Street, 1973: showing the complex following the removal of the cornice and before the addition of the fifth storey (City of Toronto Archives, Fonds 2040, Files 4, 202 and 257).



14. Archival Photograph, 100 Simcoe Street, 1988: showing the north elevation of the complex on Adelaide Street West after the addition of the complementary fifth storey (Toronto Historical Board).



15. Current Photograph, 100 Simcoe Street, 2016: looking north on Simcoe Street from King Street West and showing the subject property on the northwest corner of Pearl Street (Heritage Preservation Services).



16. Current Photographs, 100 Simcoe Street, 2016: contextual views on Adelaide Street West (above) and Pearl Street (below), showing the subject complex on Simcoe Street between Adelaide (north) and Pearl (south) (Heritage Preservation Services).

Archival Sources

- Abstract Index of Deeds, Plan 223E, Part Block C
- Archival Photographs, City of Toronto Archives and Toronto Historical Board (individual captions in Section 6)
- Assessment Rolls, City of Toronto, Ward 4, Division 1
- Bonnycastle and Tazewell, Map of the City of Toronto, 1834
- Building Permits 8 (February 9, 1904) and 862 (July 11, 1904), City of Toronto Archives
- Building Records, City of Toronto, Toronto and East York, 1951-1983
- City of Toronto Directories, 1900 ff.
- Goad's Atlases, 1880-1923
- Underwriters' Survey Bureau Atlases, 1921 revised to 1943, and 1954 revised to 1964

Secondary Sources

- Arthur, Eric, *Toronto: No Mean City*, 3rd ed. revised by Stephen A. Otto, 1986
- Careless, J. M. S., *Toronto to 1918*, 1984
- "Contracts Awarded," *Canadian Contract Record*, September 23, 1903 and October 28, 1903
- Dendy, William, *Lost Toronto*, 2nd ed., revised 1993
- Doucette, Joanne, "Rolph-Clark-Stone Limited, 201 Carlaw Avenue," Riverdale Historical Society, October 2016, <https://leslievillehistory.com/2016/10/22/rolph-clark-stone-ltd-201-carlaw/>
- "Ernest Ross Rolph," entry in *Biographical Dictionary of Architects in Canada, 1800-1950*, <http://www.dictionaryofarchitectsincanada.org/node/579>
- Foder, D. J., *The Brown Brothers: History*, 2000
- "George Wallace Gouinlock," entry in *Biographical Dictionary of Architects in Canada, 1800-1950*, <http://dictionaryofarchitectsincanada.org/node/1593>
- "Graphic Art and Design," entry in *The Canadian Encyclopedia*, www.thecanadianencyclopedia.com/en/article
- "Henry Sproatt," entry in *Biographical Dictionary of Architects in Canada, 1800-1950*, <http://dictionaryofarchitectsincanada.org/node/1322>
- "Leonard Foulds," entry in *Biographical Dictionary of Architects in Canada, 1800-1950*, <http://www.dictionaryofarchitectsincanada.org/node/770>
- McHugh, Patricia, *Toronto Architecture: A City Guide*, 2nd ed., 1989
- "Noted Industrialist dies in Preston" (Frank A. Rolph), *The Globe*, October 25, 1941, 1-2
- Rolph-Clark-Stone Limited, *100 Years of Lithographing and Printing*, 1949
- -----, *A Profile of Rolph-Clark-Stone*, 1970
- Rolph Family Records, www.ancestry.ca

The property at 100 Simcoe Street is worthy of designation under Part IV, Section 29 of the Ontario Heritage Act for its cultural heritage value, and meets Ontario Regulation 9/06, the provincial criteria prescribed for municipal designation under all three categories of design, associative and contextual value.

Description

The property at 100 Simcoe Street is located on the west side of Simcoe Street between Pearl Street (south) and Adelaide Street West (north) in the King-Spadina neighbourhood. It contains a former industrial building that was constructed in two sections for Rolph and Clark Limited following the merger of two leading Toronto lithography firms. Toronto architect G. W. Gouinlock designed the south section (1904), with the architectural firm of Sproatt and Rolph completing the complementary north section (1905). From 1912 until 1951, the property at 100 Simcoe Street was occupied by Brown Brothers Limited, bookbinders and stationery manufacturers. The complex was modified for commercial uses at the end of the 20th century.

Statement of Cultural Heritage Value

Physical and Design Value

The Rolph and Clark Limited Building is valued for its design as a representative example of Edwardian Classicism, which was popular for industrial and other building types in the pre-World War I era. The subject building displays the features of the style, with the sombre red brick surfaces, the symmetrical fenestration, and the classical organization and detailing that (according to archival images) originally included elaborate cornices. The complex was updated in the late-20th century with the addition of the fifth storey, which complements the original sections of the building with the brickwork and the segmental-arched window openings that reflect the historic fenestration.

Historical and Associative Value

The property at 100 Simcoe Street is valued historically for its contribution to the development, evolution and regeneration of the King-Spadina neighbourhood during the 20th century. The area changed from an institutional enclave adjoined by residential subdivisions to Toronto's new manufacturing district after the Great Fire of 1904, which led to the merger of two leading Toronto lithography companies that occupied and expanded the industrial building at 100 Simcoe Street. Although King-Spadina declined after World War with the departure of many industries to Toronto's suburbs, it was revived in the 1960s when entrepreneur Edwin "Honest Ed" Mirvish restored the Royal Alexandra Theatre and adapted the neighbouring early-20th century warehouses for restaurants. In the late 1980s, the property at 100 Simcoe Street was converted from industrial to commercial uses as part of the ongoing transformation of King-Spadina.

The cultural heritage value of the Rolph and Clark Limited Building is also through its historical association with significant businesses in King-Spadina. After the Great Fire

of 1904 destroyed the premises of the Rolph, Smith and Company, it merged with the rival Clark Lithographing Company as Rolph and Clark Limited and completed the complex at 100 Simcoe Street. Rolph and Clark Limited left King-Spadina in 1912 (prior to the company's amalgamation with lithographers Stone Limited as Rolph-Clark-Stone Limited) and sold the subject property to Brown Brothers Limited. For the next 40 years, Brown Brothers Limited operated its bookbindery and business stationery company at 100 Simcoe Street.

The Rolph and Clark Limited Building's historical value is also through its links to important Toronto architects. Famed practitioner G. W. Gouinlock received the commission for the south section of the building at 100 Simcoe Street after designing the headquarters of the Toronto Lithography Company (1901), a designated heritage property at 461 King Street West. The Rolph and Clark Limited Building reflected Gouinlock's ability to design high-end classically-inspired buildings, a skill that contributed to his subsequent role as official architect of the Canadian National Exhibition where he oversaw the early-20th century reorganization of the grounds with more than a dozen new structures, including several commemorated as National Historic Sites. The north section of the Rolph and Clark Limited Building was completed by the notable Toronto architectural partnership of Sproatt and Rolph as an early example of the firm's work. While Sproatt and Rolph had a personal connection to the project (Ernest Rolph was the son of Rolph and Clark Limited's co-founder), it demonstrated the architects' dexterity in the design of a complementary yet distinguishable extension to the complex, and prefaced Sproatt and Rolph's success in designing other industrial edifices in King-Spadina and landmark buildings throughout Toronto.

Contextual Value

Contextually, the property at 100 Simcoe Street has value through its support for the historical character of the King-Spadina neighbourhood where it is part of an important collection of former factories and warehouses that changed the area from its origins as an institutional and residential district to Toronto's new manufacturing centre following the Great Fire of 1904 and, in the late-20th century, evolved into a commercial hub and the city's Entertainment District. With its location on Simcoe Street, the Rolph and Clark Limited Building anchors the east end of the King-Spadina neighbourhood.

The Rolph and Clark Limited Building is historically and visually linked to its setting on the west side of Simcoe where it extends along the block from Pearl Street to Adelaide Street West. The property at 100 Simcoe Street forms part of an enclave of surviving early-20th century industrial buildings northwest of King and Simcoe streets, including the collection of former factories and warehouses on King Street West between Simcoe and John streets and on Duncan Street, north of King, which are recognized on the City of Toronto's Heritage Register.

Heritage Attributes of the Rolph and Clark Limited Building at 100 Simcoe Street are:

- The placement, setback and orientation of the building on the west side of Simcoe Street between Pearl Street and Adelaide Street West
- The scale, form and massing of the five-storey building above the raised base with the window openings
- The materials, with the red brick cladding and the brick and stone detailing
- The flat roofline covering the complex
- The organization of the building into the south (1904) and north (1905) sections, which are distinguished from one another by the paired openings on the north section
- The south section of the building, which extends eight bays on Simcoe Street (east) and six bays on Pearl Street (south), with the canted southeast corner
- The fenestration on the south section (east and south elevations), with the flat-headed window openings with the stone lintels in the first, second and fourth stories and the segmental-arched window openings with the brick voussoirs and stone keystones in the third storey
- The entrance on the east wall of the south section, which is placed in the northernmost bay (the eighth bay from the south end) and reflects the late-20th century conversion of the building from industrial to commercial uses
- The north section, which extends four double bays on both Simcoe Street (east) and Adelaide Street West (north), with the single bay at the west end of the north elevation with the entrance at the base (the entrance has been modified)
- The fenestration on the north section (east and north elevations), where the flat-headed window openings in the first, second and fourth stories and the segmental-arched window openings in the third storey have brick and stone detailing and are arranged in pairs (apart from the single openings in the westernmost bay of the north elevation)
- The fifth storey, which was added in the late-20th century and extends across the north and south sections, with the complementary red brickwork with brick and stone trim, and the symmetrically-placed regular and oversized segmental-arched window openings that reference the shape and detailing of the third-storey openings

The window opening at the base of the southeast corner (which replaced the original corner entrance), the adjoining entrance opening in the southernmost bay of the east elevation, and the cladding adjoining the latter openings are not identified as heritage attributes.