

## **221 Sterling Road – Proposed Designation By-law Under Part IV, Section 29 of the Ontario Heritage Act - Consideration of Objections**

**Date:** August 3, 2022

**To:** City Council

**From:** Chief Planner and Executive Director, City Planning

**Wards:** Davenport - Ward 9

### **SUMMARY**

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This report recommends that Council affirm its decision of May 11 and 12, 2022 (Item PH33.17) stating its intention to designate the property at 221 Sterling Road (including active entrances at 225 and 227 Sterling Road) under Part IV, Section 29 of the Ontario Heritage Act. The City has received an objection to the Notice of Intention to Designate on behalf of the property owner within the statutory timeline.

The property at 221 Sterling Road is a complex of former industrial buildings located on the east side of Sterling Road, south of Bloor Street West.

Staff have reviewed the objections raised by the owner and are of the opinion that despite these objections, 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/physical, historical/associative, and contextual values.

As the property has cultural heritage value or interest and meets the prescribed criteria pursuant to Part IV, Section 29 of the Ontario Heritage Act, this property should be designated. Designation enables Council to review proposed alterations for the property, enforce heritage property standards and maintenance, and refuse demolition.

In June 2019, the More Homes, More Choice Act, 2019 (Bill 108) received Royal Assent. Schedule 11 of this Act included amendments to the Ontario Heritage Act (OHA), which included amendments to the listing and designation processes. The Bill 108 Amendments to the OHA came into force on July 1, 2021.

## **RECOMMENDATIONS**

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The Chief Planner and Executive Director, City Planning recommends that:

1. City Council affirm its decision to state its intention to designate the property at 221 Sterling Road (including active entrances at 225 and 227 Sterling Road) under Part IV, Section 29 of the Ontario Heritage Act as set out in Council Decision PH33.17 on May 11 and 12, 2022.
2. City Council authorize the City Solicitor to introduce the Bill in Council designating the property at 221 Sterling Road (including active entrances at 225 and 227 Sterling Road) under Part IV, Section 29 of the Ontario Heritage Act.

## **FINANCIAL IMPACT**

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

## **DECISION HISTORY**

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On May 11 and 12, 2022, City Council stated its intention to designate the property at 221 Sterling Road (including active entrances at 225 and 227 Sterling Road) under Part IV, Section 29 of the Ontario Heritage Act.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2022.PH33.17>

## **BACKGROUND**

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City Council has stated its intention to designate the property at 221 Sterling Road (including active entrances at 225 and 227 Sterling Road) under Part IV, Section 29 of the Ontario Heritage Act (the Act). Notice of Council's intention to Designate was served on the property owners and the Ontario Heritage Trust, and was published in accordance with the Act. The objection period ended on June 16, 2022.

A Notice of Objection was received by the City Clerk on behalf of the owners of the property within the required timeframe set out in the Act. The Act requires that Council consider and make a decision on an objection within 90 days from the end of the objection period, subject to any permitted exceptions under the Act. Council may decide to withdraw, amend, or affirm its intention to designate.

## COMMENTS

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Staff have reviewed the Notice of Objection dated June 16, 2022, and prepared by Overland LLP. The Notice of Objection is included as Attachment 1 to this report. Within this letter the owners outline a number of reasons for their objection. No new or relevant information was provided.

The owners have expressed the opinion that property lacks design value as "a modest example of early twentieth century industrial development in the City," and that the structures "have been significantly altered over the years as part of their adaptive reuse." They contend that the Notice of Intention to Designate's identification of associative and contextual value is at odds with the "broader planning vision" for the surrounding area, and that there is "nothing unique" about the property's relationship with 213 Sterling Road. They also state that in general, physical features identified as heritage attributes in the Statement of Significance (Reasons for Designation) "should be listed as characteristics of design and physical value" rather than historical/associative and/or contextual value. The Statement of Significance (Reasons for Designation) adopted by Council is appended to this report as Attachment 2.

Staff have re-examined the Statement of Significance (Reasons for Designation) for the property at 221 Sterling Road and remain of the opinion that the extent of the Statement of Cultural Heritage Value and the Heritage Attributes appropriately describe the cultural heritage value or interest of this property as it relates to the criteria prescribed by Ontario Regulation 9/06 of the Act. Staff do not recommend revisions to the extent of this statement.

In the opinion of Heritage Planning staff, the property at 221 Sterling Road is a rare and unique example of a former industrial complex that evolved to accommodate various manufacturing uses, and later gained prominence for its adaptive reuse as an incubator of arts and culture. Few such examples of live-work complexes remain extant in Toronto. The property is directly associated with the Canadian Fairbanks-Morse Company, and with the themes of industrial development as well as arts and culture in the area. The property is important in maintaining and supporting the character of Sterling Road as a former industrial streetscape, which has evolved as an area known for supporting arts and culture. The adjacent property at 213 Sterling Road, which was also associated with the Canadian Fairbanks-Morse Company, stands in clear architectural dialogue with the property at 221 Sterling Road.

## **CONCLUSION**

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The property at 221 Sterling Road 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/physical, historical/associative, and contextual values. As such, despite the Notice of Objection, this property should be designated.

## **CONTACT**

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Mary L. MacDonald, MA, CAHP  
Senior Manager, Heritage Planning  
Urban Design, City Planning  
Tel: 416-338-1079; Fax: 416-392-1973  
E-mail: Mary.MacDonald@toronto.ca

## **SIGNATURE**

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Gregg Lintern, MCIP, RPP  
Chief Planner and Executive Director  
City Planning

## **ATTACHMENTS**

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Attachment 1 – Letter of Objection – 221 Sterling Road  
Attachment 2 – Statement of Significance – 221 Sterling Road

**221 STERLING ROAD  
LETTER OF OBJECTION**

**ATTACHMENT 1**

Daniel B. Artenosi  
Partner  
Direct 416-730-0320  
Cell 416-669-4366  
dartenosi@overlandllp.ca

Overland LLP  
5255 Yonge St, Suite 1101  
Toronto, ON M2N 6P4  
Tel 416-730-0337  
overlandllp.ca



June 16, 2022

John Elvidge  
City Clerk  
City of Toronto  
100 Queen Street West, 2nd Floor West  
Toronto ON M5H 2N2

Attention: Administrator, Secretariat, City Clerk's Office

Dear Mr. Elvidge,

**RE: 221 Sterling Road  
Notice of Objection by 221 Sterling Road Holdings Inc. to the  
Notice of Intention to Designate issued by the City of Toronto  
on May 17, 2022  
Ontario Heritage Act, Section 29(5)**

We are the solicitors for 221 Sterling Road Holdings Inc. ("the **Owner**"), being the owner of the property municipally known as 221, 225 and 227 Sterling Road (the **Site**).

On May 17, 2022, the City of Toronto (the **City**) issued a Notice of Intention to Designate the Site under Part IV, Section 29 of the *Ontario Heritage Act*, R.S.O. 1990, c.O.18, as amended (the **Notice of Intention**). On behalf of our client, we hereby object to the Notice of Intention pursuant to Section 29(5) of the *Ontario Heritage Act* (the **Notice of Objection**). Our general reasons in support of the Notice of Objection are set out on a preliminary basis below.

**Background**

***The Subject Site***

The Site is located on the east side of Sterling Road, south of Bloor Street and north of Perth Avenue.

The Site is currently occupied by a complex of five buildings with heights ranging between one and three storeys, built between 1910 and 1966 (the **Buildings**). The Site was historically occupied by the Fairbanks Morse Canadian Manufacturing Company Limited. The Site and Buildings have been repurposed over time, with resultant modifications having been made to their physical features. The Buildings are currently used for a variety of commercial and residential uses.

Prior to the issuance of the Notice of Intention to Designate, the Site was not listed on the Toronto Heritage Register.

### ***Bloor Street Study***

The Site is located within the boundary of the lands subject to the City-initiated *Bloor Street Study: St. Helen's Avenue to Perth Avenue* (the “**Study**”). The Study area is generally bounded by the north side of Bloor Street West, St. Helen's Avenue to the east, the Kitchener GO Rail corridor to the west and Sterling Road to the south.

The Study is being undertaken by the City to guide development given the increased development pressures as the character of the Area continues to transform through infill intensification. The Study area and the Site are proximate to significant higher order transit, presenting obvious opportunities to promote optimization of existing and planned infrastructure.

The Study also envisions the creation of new community infrastructure, particularly on the Site, in the form of a public road extension, a new public park, and pedestrian connections. Within this broader planning exercise, the City identified the Site as a potential heritage resource.

Our client has been active throughout the Study process. We enclose herewith correspondence submitted to the City on behalf of our client in respect of the Study and in particular, the suggestion by City Staff that the Site constitutes a potential heritage resource.

### ***The Proposed Development***

On May 4, 2021, 221 Sterling submitted applications for a zoning by-law amendment and draft plan of subdivision approval (City Files No. 21 151438 STE 09 SB and 21 151444 STE 09 OZ, collectively, the “**Applications**”).

As submitted, the Applications propose to permit the redevelopment of the Site with three residential buildings of 20, 25 and 29-storeys above two residential podiums of 4 and 7 storeys. The buildings would contain 892 residential units, including 23 live-work units and 33 rental replacement units, with a total of 417 vehicular parking spaces in two levels of underground parking. The proposal will facilitate the extension of Ruttan Street south to Sterling Road and it includes an on-site parkland dedication (collectively, the “**Proposed Development**”).

On May 30, 2022, the Applications were appealed to the Ontario Land Tribunal on the basis of a non-decision pursuant to Sections 34(11) and 51(34) of the Planning Act, R.S.O. 1990, c.P.13, as amended.

### **The Surrounding Area**

The Site is located in Toronto's Dufferin Grove neighborhood. This area is comprised of various residential and non-residential uses. As identified in the Bloor Street Study, the area is currently undergoing significant physical change and intensification.

Surrounding land uses include:

- i. To the north of the Site there are 4.5-storey residential developments dating to c.2010, adjacent a 15-storey residential tower to the east.
- ii. To the east of the Site there are a series of more recent residential townhouses dating to the early 2000s.
- iii. To the south of the Site at 213-219 Sterling Road, there is a 2-storey former industrial building (the former Moloney Electric Building) currently occupied by a variety of commercial uses. This building is not currently included on the Heritage Register, however, it is identified as a property of historical interest in the Bloor Street Study.

Further south is the property municipally known as 158 Sterling Road. The existing building was originally developed for industrial purposes, in the form of an early example of flat slab construction in Toronto at a height of 10-storeys. More recently, the building has been repurposed to a mixed-use development, with the Museum of Contemporary Art occupying the first three storeys of the building. This property is currently designated under Part IV of the Ontario Heritage Act.

- iv. To the west of the Site are 1-storey automotive commercial buildings and adjacent low-rise residential buildings fronting Sterling Road. The property municipally known as 1405 Bloor Street West, being immediately adjacent to the Site, is proposed to be re-developed with an 18-storey mixed-use development and a proposed new public park..

### **Planning Context**

The Site is designated *Apartment Neighborhoods* on Map 17 of the City of Toronto Official Plan, as are the townhouses immediately adjacent to the east of the Site. The lands to the north of the Site are designated *Mixed Use Areas*, as are the lands further east of the Barrie Go Rail Corridor. The properties at 213-219 Sterling Road are designated *Core Employment Area*. Properties further to the west are designated *Neighborhoods*.

*Apartment Neighborhoods* are made up of apartment buildings and parks, local institutions (including day nurseries), cultural and recreational facilities and small-scale retail, service, and office uses that serve the needs of the area residents.

The Site is zoned "R(d1.5)(x58)" under By-law 569-2013, as amended, with a height limit of 14 metres. The Site is zoned R4 Z1.5 under the former City of Toronto Zoning By-law 438-86, as amended, with a maximum height of 14 metres and maximum density of 1.5 FSI.

### **Reasons for Objection**

The Notice of Intention states that the Site is worthy of designation under Part IV on the basis that the Site has cultural heritage value that meets all three of the criteria set out in Ontario Regulation 09/06; namely, that it has design or physical value, historical or associative value, and contextual value.

### ***Design or Physical Value***

O.Reg 09/06 states that a property has design value or physical value if it satisfies one or more of the following three criteria:

- i. It is a rare, unique, representative or early example of a style, type, expression, material or construction method;
- ii. It displays a high degree of craftsmanship or artistic merit; or,
- iii. It demonstrates a high degree of technical or scientific achievement.

The Staff Report prepared by Chief Planner and Executive Director, City Planning, dated January 24, 2022 (the “**Staff Report**”) confirms that the Site does not qualify under criteria (ii) and (iii) above. The stated criteria that the Staff Report relies on for design or physical value is (i).

The Site has been evaluated as part of the Proposed Development by our client’s heritage consultant, Goldsmith Borgal & Company Ltd. Architects (“**GBCA**”). The findings of GBCA are set out in its Heritage Impact Assessment dated April 26, 2021 filed in support of the Applications and further enclosed herewith. As a general proposition, the existing complex of buildings on the Site is a modest example of early twentieth century industrial development in the City. The Reasons for Designation make this very point in recognizing that *“typical of industrial architecture, its exterior is generally utilitarian in nature and relatively unadorned.”*

The Notice of Intention states that the Site contains cultural heritage value as an evolved manufacturing complex that has been adaptively reused to support the arts. The Notice of Intention appears to anchor the purported Design or Physical Value in part on the scale, form and massing of the Buildings’ original portion (dating to c.1914-1918) and the early eastern and northern additions (dating to c.1924-1939). Scale, form and massing are characteristics of development in general. There is nothing rare, unique, representative of the scale, form and massing of the Buildings that rises to the level of significant heritage value worthy of conservation. As stated above, industrial development in the immediate area is found at different scales, forms and massing, such as, for example, the building at 158 Sterling Road which is an example of industrial development in the form of a 10-storey slab constructed building.

Similarly, the Notice of Intention suggests that the Site’s design and physical heritage attributes include an industrial material palette with primarily red brick and concrete on



both the exterior and interior; original window openings and operable windows; original door openings, including some that include double doors and some that include garage doors; and, 18-to-20 foot ceiling heights in many units, some of which include exposed structural beams. These physical features repeat a common issue with this proposed list of heritage attributes in that they include characteristics of industrial development generally, without substantiating that the Buildings rise to the level of significant cultural heritage resource worthy of conservation. Otherwise put, the characteristics do not display a rare, unique, representative or early example of an architectural style, type, expression, material or construction method that rises to the level worthy of designation and conservation.

The proposed heritage attributes further lack specificity to direct the reader to the purported elements of value. For example, the Notice of Intention refers to “original” window openings and doors without identifying which openings are included in this categorization, suggesting that further work is to be completed in order to identify the elements of purported cultural heritage value.

In addition, the Buildings have been significantly altered over the years as part of their adaptive reuse, further undermining their integrity as even modest examples of early twentieth century industrial development in this area. The physical change that has occurred on the Site is principally acknowledged in the Staff Report, particularly as this physical change has been a characteristic of the Buildings’ adaptive reuse.

As a related point, the proposition that 18-to-20 foot ceilings constitutes a design and physical value worthy of conservation is novel. The Notice of Intention recognizes that these ceiling heights exist in “many of the units,” making clear that this design feature is not a consistent characteristic of the Buildings, likely on account of the fact that the Buildings have been significantly altered as part of their adaptive reuse. In fact, the Staff Report notes that alterations to the building have occurred to the interior spaces “*such as adding mezzanine levels to studios*” (p.13 of the Staff Report). To the extent that this stated physical feature is intended to contribute to the defined heritage value of the Site and in turn constitute a value to be conserved, it would limit the opportunities for adaptive reuse of the physical space despite the fact that this has been ongoing for much of the Buildings’ history as acknowledged in the Notice of Intention and Staff Report, thereby creating an internal inconsistency.

It is also unclear how the ceiling height found in certain units rises to the level of a design feature that contributes to the understanding and appreciation of the history of a place, an event or people, given the location of the feature internal to private units that are not generally accessible to the public.

#### ***Historical or Associative Value***

O.Reg 09/06 states that a property has historical or associative value if it meets one or more of the following three criteria:

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

The Staff Report confirms that the Site does not qualify under criteria (ii) and (iii) above. The stated criteria that the Staff Report relies on for historical or associative value is (i).

The Notice of Intention suggests that the Site's historic or associative value is based on the Site reflecting the history of industrial development and arts-related adaptive reuse along Sterling Road. The Notice of Intention then goes on to list general physical characteristics of the Buildings, including its siting and orientation, the general large-scale interior spaces with flexible configurations, skylights in hallways and units, some of which are original, exterior communal spaces as points of connection, and original rail lines that remain visible in the floors and hallways of units.

To the extent that the physical features constitute elements of value, they should be listed as characteristics of design and physical value and in turn subject to the criteria set out in O.Reg. 09/06 listed above. That being said, the stated characteristics do not rise to the level of heritage value worthy of conservation.

As a general proposition, the Notice of Intention and supporting Staff Report attempt to link the internal configurations of space and physical characteristics listed above as supporting the promotion of arts and culture. It would in turn appear that one of the underlying objectives of the original recommendation for designation is to preserve a specific use(s) that currently exists on the Site, which is not a basis for designation under Part IV of the Ontario Heritage Act.

There is also a fundamental disconnect between the suggestion that the Site's siting and orientation constitutes a heritage attribute worthy of conservation and the general planning vision for the Site and surrounding area emerging through the Bloor Street Study, which envisions a new public road connection through the Site and the introduction of a new public park with pedestrian connections. The Applications propose to introduce new community infrastructure consistent with this broader planning vision through the redevelopment of the Site, which will undoubtedly alter the Site's siting and orientation relative to its surroundings. Otherwise put, the Notice of Intention fails to recognize the physical change envisioned for the Site as part of the broader policy objectives for the Area, which will be implemented through the Applications and redevelopment of the Site.

#### ***Contextual Value***

O.Reg 09/06 states that a property has contextual value if it meets one or more of the following three criteria:

- i. it is important in defining, maintaining or supporting the character of an area;
- ii. it is physically, functionally, visually or historically linked to its surroundings; or,
- iii. it is a landmark.

The Staff Report confirms that the Site does not qualify under criteria (iii) above. The stated criteria that the Staff Report relies on for contextual value is (i) and (ii).

The Notice of Intention states that the cultural heritage value of the Site is that it constitutes one of a concentration of former industrial buildings, many of which now have cultural functions. The Notice of Intention then states that heritage attributes under the category of Contextual Value include the Site's siting and orientation, accessed via Sterling Road but situated in parallel with the railway tracks to the east, and the Site's visual and spatial relationships to the adjacent property at 213 Sterling Road, particularly via visibility and public access to the alleyway formed between the north elevation of 213 Sterling Road and the south elevation of 221 Sterling Road.

While the surrounding area includes industrial buildings, the area is more properly characterized as a mixed-use community that is currently undergoing a process of reinvestment and intensification. This is reflected in both existing and proposed developments, underlying land use, and the emerging planning vision through the Bloor Street Study that is generally intended to guide growth through the optimization of significant infrastructure, and to promote the development of new community infrastructure to support this growth. To the extent that there is any relationship between the Site and its industrial origins, it does not rise to the level of significance worthy of conservation.

The stated heritage attributes above are again examples of physical or design features of the Site. If these features are a basis to support designation, they are subject to the criteria listed above under Design or Physical Value. That being said, the stated features do not substantiate the proposed Part IV designation of the Site. These features appear to be general urban design considerations that do not contribute to our understanding and appreciation of the history of a place, an event or people in a manner that warrants designation. All buildings will inherently have a spatial relationship to adjacent properties and other buildings. There is nothing unique about the existing building separation to the adjacent property at 213 Sterling Road that constitutes a contextual value worthy of heritage designation and conservation.

#### **Enclosures**

In support of this Notice of Objection, please find enclosed the following materials:

1. Report for Action to Toronto Presentation Board, dated November 10, 2021, 221 Sterling Road – Notice of Intention to Designate a Property under Part IV, Section 29 of the Ontario Heritage Act;
2. Correspondence dated December 1, 2021, to Toronto Preservation Board Regarding Item PB 29.1, including enclosures;
3. Notice of Intention to Designate the Property, dated May 17, 2021;
4. Heritage Impact Assessment for 221-225 Sterling Road (prepared by GBCA Architects);
5. Planning & Urban Design Rationale (Prepared by Bousfields Inc).

Should you require any further information, documentation, or any other thing to constitute this Notice of Objection, please advise the undersigned forthwith, or in his absence Natalie Ast ([nast@overlandllp.ca](mailto:nast@overlandllp.ca) or 416-730-0387)

Yours truly,  
**Overland LLP**

  
Per: Daniel B. Artenosi  
Partner

**STATEMENT OF SIGNIFICANCE  
(REASONS FOR DESIGNATION)**

The property at 221 Sterling Road 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 the categories of design/physical value, historical/associative value, and contextual value.

**Description**

The property at 221 Sterling Road comprises a complex of adjoining one- and two-storey brick structures, constructed incrementally in c.1914-1918, c.1924-1939, and c.1954-1965. Located on the east side of Sterling Road, the property is set back at an angle from the street, oriented instead in parallel with the railway tracks to the east. The complex runs generally north-south on an irregularly shaped lot, which is defined by Merchant Lane to the north, and alleyways to the east and south. Because the building evolved in an unplanned way through a series of additions to suit the requirements of various occupants, boundaries between the building's components are not always legible within the building's flexible interior spaces. Typical of industrial architecture, its exterior is generally utilitarian in nature and relatively unadorned. The property features multiple entrances, on all elevations, and its unique footprint creates exterior opportunities for social connection, particularly in the eastern alleyway, where communal spaces are bordered by a retaining wall.

**Statement of Cultural Heritage Value**

The property at 221 Sterling Road is a rare and unique example of a former industrial complex that evolved to accommodate various manufacturing uses, and later gained prominence for its adaptive reuse as an incubator of arts and culture. Originally part of a site developed alongside the Grand Trunk Railway tracks for the Fairbanks-Morse Canadian Manufacturing Company Ltd., the property was constructed incrementally with an original portion from pre-World War I, interwar additions in c.1924-1939, and postwar additions in c.1954-1965. It served a variety of industrial uses through the mid- to late-twentieth century, and has since continued to evolve as a hub of cultural activities, housing a number of creative organizations and performance spaces. The property's gradual construction and adaptation produced an unusual, rambling complex with an interior that allows for reconfiguration to suit tenants' needs, and an exterior that creates moments of social connection. The building's physical value is expressed through industrial characteristics that facilitate adaptive reuse for live-work studios and light industrial cultural businesses.

The property reflects the history of industrial development along Sterling Road within the lower Junction Triangle and Brockton Village areas, and contributes to a concentration of former industrial buildings, many of which now have cultural functions. It originated as part of lands developed by the Fairbanks-Morse Canadian Manufacturing Company Ltd. adjacent to the Grand Trunk Railway line. This company

played an important role in the industrial development of the area through their development of a large manufacturing complex, including the subject property. Needs arising from Canada's involvement in the First World War meant that by the late 1910s, the Canadian Fairbanks-Morse Company, like other plants in Toronto, received a munitions contract and manufactured explosive shells during this period. In addition to the theme of industrial development, the property reflects the theme of promotion of arts and culture through adaptive reuse of industrial buildings; this theme is especially significant to the local community. Few such examples of formerly industrial, live-work complexes remain extant in Toronto.

The property is important in maintaining and supporting the character of Sterling Road as a former industrial streetscape, which has evolved as an area known for supporting arts and culture. In particular, it is linked to the adjacent property at 213 Sterling Road, which was also associated with the Canadian Fairbanks-Morse Company, and with which it stands in architectural dialogue. The only building of its kind on Sterling Road that continues to house a live-work community, 221 Sterling Road relates to surrounding industrial properties on Sterling Road that have been adaptively reused for the purposes of arts and culture.

## **Heritage Attributes**

### **Design and Physical Value**

The following heritage attributes contribute to the cultural heritage value of the property at 221 Sterling Road as an evolved manufacturing complex that has been adaptively reused to support the arts:

- Scale, form, and massing of the property's original portion (dating to c.1914-1918), located at the building's southwest corner
- Scale, form, and massing of the property's early eastern and northern additions (dating to c.1924-1939)
- Throughout the complex, features that represent the property's industrial origins and later facilitated its adaptive reuse, including:
  - An industrial material palette with primarily red brick and concrete on both the exterior and interior
  - Original window openings and operable windows
  - Original door openings, including some that include double doors and some that include garage doors
  - 18'-to-20' ceilings in many units, some of which include exposed structural beams

### **Historic and Associative Value**

The following heritage attributes contribute to the cultural heritage value of the property at 221 Sterling Road as reflecting the history of industrial development and arts-related adaptive reuse along Sterling Road:

- The property's siting and orientation, accessed via Sterling Road but situated in parallel with the railway tracks to the east
- Original window openings and operable windows
- Original door openings, including some that include double doors and some that include garage doors
- An industrial material palette with primarily red brick and concrete on both the exterior and interior
- 18'-to-20' ceilings in many units, some of which include exposed structural beams
- Generally large-scale interior spaces with flexible configurations
- Skylights in many hallways and units, some of which are original
- Exterior communal spaces as points of connection, including in the eastern (rear) alley, which is set apart by a grade change and a retaining wall
- Original rail lines that remain visible in the floors and hallways of units

### **Contextual Value**

The following heritage attribute contributes to the cultural heritage value of the property at 221 Sterling Road as one of a concentration of former industrial buildings, many of which now have cultural functions:

- The property's siting and orientation, accessed via Sterling Road but situated in parallel with the railway tracks to the east
- The property's visual and spatial relationships to the adjacent property at 213 Sterling Road, particularly via visibility and public access to the alleyway formed between the north elevation of 213 Sterling Road and the south elevation of 221 Sterling Road