

## **171 East Liberty Street - Inclusion on the Heritage Register**

**Date:** March 13, 2026

**To:** Toronto Preservation Board

Toronto and East York Community Council

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

**Wards:** 10 – Spadina-Fort York

### **SUMMARY**

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This report recommends that City Council include 171 East Liberty Street (including structure addresses at 165 – 167 East Liberty Street, 171 East Liberty Street and 37 Hanna Avenue) on the City of Toronto's Heritage Register for its cultural heritage value and interest according to the Listing Statement (Reasons for Inclusion) found in Attachment 1.

The subject property at 171 East Liberty Street is located at the southeast corner of East Liberty Street and Hanna Avenue in the Fort York – Liberty Village neighbourhood. The property is a former factory complex containing three brick buildings constructed in 1942 as the John Inglis Company Bren Gun Assembly and Test Buildings. The site comprises buildings at 171 East Liberty Street (the north structure), 37 Hanna Avenue (the south structure) and 165-167 East Liberty Street (the northeast structure with associated smokestack). The property contributes to an important collection of surviving industrial buildings in Liberty Village. A location map and current photograph of the heritage property are found in Attachment 1.

The property recommended for inclusion on the City's Heritage Register has been researched and evaluated by staff using the criteria prescribed in Ontario Regulation 9/06 and meets one or more of the provincial criteria for determining cultural heritage value or interest and is believed to be of cultural heritage value or interest.

On January 1, 2023, amendments to the Ontario Heritage Act (the Act) through the More Homes Built Faster Act, 2022 (Bill 23) came into effect. Under the Act, as amended, a municipal heritage register may include properties that have not been designated but Council believes to be of "cultural heritage value or interest", and that meet one or more of the provincial criteria for determining whether they are of cultural heritage value or interest. The Act now also limits listing to a period of two years.

As of January 1, 2023, should a property be subject to an Official Plan Amendment, Zoning By-law Amendment and/or Draft Plan of Subdivision Application, properties must be listed on the heritage register prior to Part IV designation and before the occurrence of a prescribed event. A prescribed event is a point of time when the application for an Official Plan Amendment, Zoning By-law Amendment and/or Draft Plan of Subdivision Application has been deemed complete and the City Clerk provides notice of that complete application to the public in accordance with the Planning Act.

The listing of non-designated properties on the municipal heritage register under the Act also extends interim protection from demolition and provides an opportunity for City Council to determine whether the property warrants conservation through designation under the Act should a development or demolition application be submitted.

Properties on the Heritage Register will be conserved and maintained in accordance with the Official Plan Heritage Policies. Heritage Impact Assessments (HIA) are required for development applications that affect listed properties.

## **RECOMMENDATIONS**

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

1. City Council include 171 East Liberty Street (including structure addresses at 165 – 167 East Liberty Street, 171 East Liberty Street and 37 Hanna Avenue) on the City of Toronto's Heritage Register in accordance with the Listing Statement (Reasons for Inclusion) attached as Attachment 1 to the report, March 13, 2026, from the Senior Manager, Heritage Planning, Urban Design, City Planning.

## **FINANCIAL IMPACT**

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There are no financial implications resulting from the recommendations included in this report in the current budget year or in future years.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the information as presented in the Financial Impact Section.

## **DECISION HISTORY**

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On April 17 and 18, 2024, Council adopted the Liberty Village Public Realm Strategy. The property located at 171 East Liberty Street was identified in the Public Realm Strategy as a potential heritage property requiring heritage evaluation. [Item – 2024.TE12.16](#)

## **POLICY AND REGULATION CONSIDERATIONS**

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

Further, the policies and definitions of the Provincial Planning Statement (2024) identify the Ontario Heritage Act as the primary legislation through which heritage evaluation and heritage conservation will be implemented.

[Provincial Planning Statement, 2024 \(ontario.ca\)](#)

Ontario Regulation 9/06 sets out the criteria for evaluating properties to be included in the Heritage Register under subsection 27 (1) of the Ontario Heritage Act. The criteria are based on an evaluation of design/physical value, historical and associative value and contextual value. A property may be included on the Heritage Register as a non-designated property if the property meets one or more of the provincial criteria for determining whether it is of cultural heritage value or interest.

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

### **Official Plan**

The City of Toronto's Official Plan implements the provincial policy regime and provides policies to guide decision making within the City. It 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. The Official Plan should be read as a whole to understand its comprehensive and integrative intent as a policy framework for priority setting and decision making. The Official Plan can be found here:

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

## **COMMENTS**

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Identifying properties of cultural heritage value or interest is an essential part of a municipality's role in heritage conservation. Including non-designated properties in the municipal register is a means to identify properties that the City believes to have cultural heritage value or interest.

The subject property at 171 East Liberty Street (including structure addresses at 165 – 167 East Liberty Street, 171 East Liberty Street and 37 Hanna Avenue) comprises a former factory complex containing three brick buildings constructed in 1942 as the John Inglis Company Bren Gun Assembly and Test Buildings.

The subject property was identified in the 2024 Liberty Village Public Realm Strategy as a potential heritage property requiring heritage evaluation. The subject property is located within the study area of the Liberty Village Cultural Heritage Resource

Assessment, which is currently in progress by Heritage Planning staff through the Liberty Planning for All Study.

The subject property at 171 East Liberty Street (including structure addresses at 165 East Liberty Street, 167 East Liberty Street, and 37 Hanna Avenue) has been identified as having design/physical, historical/associative, and contextual value.

More detailed historical research conducted through a future evaluation for designation under Part IV of the Ontario Heritage Act may determine additional cultural heritage values for the subject property.

### **Inclusion of (non-designated) properties on the City's Heritage Register**

Non-designated listed properties do not have any protection under the Ontario Heritage Act, except insofar as an owner must give Council at least 60 days' notice of their intention to demolish or remove a structure on the property.

Properties that are listed on the City's Heritage Register are flagged for review by Heritage Planning staff once a demolition permit has been submitted and owners must follow established Notice requirements under the Ontario Heritage Act following this action.

Although inclusion on the Heritage Register as a listed property provides interim protection from demolition, it does not preclude an owner's ability to make exterior and interior alterations in the case when demolition or a development application is not involved.

Listing does not trigger maintenance requirements over and above existing property standards and it does not restrict altering, removing or adding any features on the property. It does not allow the City to withhold a building permit for non-demolition related alterations and it does not preclude a property from undergoing renovation.

A municipality is not required to consult with property owners or the public before including non-designated properties on the municipal register under the Act. The City's current practice, developed prior to Bill 23 amendments to the Act coming into effect, notifies property owners and invites them to attend the Toronto Preservation Board meeting to discuss the recommendation of a property's inclusion on the City's Heritage Register. There is also an opportunity for owners and the public to share concerns (in person or writing) when Community Council or Planning and Housing Committee considers a heritage related matter.

Short descriptive listings are prepared using a method by which properties are identified and recommended for inclusion on the Heritage Register. This approach to listing provides sufficient information to meet the requirements of Section 27 of the Act to list a non-designated property on the Heritage Register.

Brief statements, named "Reasons for Inclusion", are prepared for all recommended properties explaining why the property is believed to have cultural heritage value and how it meets one or more of the provincial criteria under O. Reg 9/06 providing a

preliminary evaluation of the cultural heritage value or interest of the property. The description may include features of the property that may warrant conservation should the property be subject to development and/or further evaluated and determined to merit designation under Part IV of the Act. Location map and photographs are included in each Reasons for Inclusion.

Through Bill 108 and Bill 23, amendments were made to the Ontario Heritage Act to establish a process whereby owners can object to a property's listing on the Heritage Register and, should they do so, a subsequent decision on the listing must be made by the municipality. Owners can object to listings at any time. Chapter 103 of the Toronto Municipal Code establishes the process for Council consideration of objections to properties included on the Heritage Register.

## **CONCLUSION**

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Following research and evaluation of the property at 171 East Liberty Street (including structure addresses at 165 – 167 East Liberty Street, 171 East Liberty Street and 37 Hanna Avenue) according to Ontario Regulation 9/06, it has been determined that the property, known as the John Inglis Company Bren Gun Assembly and Test Buildings, meets one or more provincial criteria and merit inclusion on the City's Heritage Register. The Listing Statement (Reasons for Inclusion) is included as Attachment 1

## **CONTACT**

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## **SIGNATURE**

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Mary L. MacDonald, MA, CAHP  
Senior Manager, Heritage Planning  
Urban Design, City Planning

## **ATTACHMENTS**

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Attachment 1 – 171 East Liberty Street Listing Statement (Reasons for Inclusion)

**Listing Statement (Reasons for Inclusion)**

Staff have undertaken research and evaluation for the property at 171 East Liberty Street, known as the John Inglis Company Bren Gun Assembly and Test Buildings, and believe that the property has cultural heritage value or interest and meets at least one or more of the criteria prescribed in Ontario Regulation 9/06 for including a non-designated property on a municipal register under Section 27 of the Ontario Heritage Act. The subject property may meet additional criteria, which could be informed by community engagement and determined through further research and evaluation.

**Listing Statement:**

Description: Located at the southeast corner of East Liberty Street and Hanna Avenue in the Fort York – Liberty Village neighbourhood, the property at 171 East Liberty Street is a former factory complex containing three brick buildings constructed in 1942 as the John Inglis Company Bren Gun Assembly and Test Buildings. The site comprises buildings at 171 East Liberty Street (the north structure), 37 Hanna Avenue (the south structure) and 165-167 East Liberty Street (the northeast structure with associated smokestack)

The property at 171 East Liberty Street (including structure addresses at 165 East Liberty Street, 167 East Liberty Street, and 37 Hanna Avenue) has cultural heritage value as it meets the following criteria under Ontario Regulation 9/06 of the Ontario Heritage Act:

The property has historical and associative value for its association with the industrial activity which historically defined the Liberty Village area throughout most of the late nineteenth and twentieth centuries. The buildings were constructed as an adjunct to the John Inglis Company factory complex at 14 Strachan Avenue, a significant and sprawling manufacturing facility in Liberty Village from 1881 – 1991. Located adjacent, and to the southwest of the company's main complex, buildings at 171 East Liberty Street survive as structures that recall the sizable presence of the John Inglis Company factory complex in Liberty Village. Upon completion, the John Inglis Company Bren Gun Assembly and Test Buildings at 171 East Liberty Street contributed to the area's industrial activity and served as a major Second World War munitions factory.

The property has design and physical value for being representative of an early twentieth century factory complex typology. Typical of factory complexes, each building was designed for a division of functions. At this complex, the north building (171 East Liberty Street) was designed as a Bren Gun Assembly Building and contained a cafeteria, machine shops and offices. The south building (37 Hanna Avenue) - designed as the Test Building – also contained machine shops as well as an indoor firing range; the northeast building with smokestack (165-167 East Liberty Street) was the boiler and chip house, serving as the heating plant for the complex. The buildings were unified by their brick and concrete construction with their cohesive exteriors of red, hard, facing brick cladding and large multi-light steel-sash windows to maximize natural light - some of which remain extant.

The former factory complex at 171 East Liberty Street is also significant because it reflects the work of the Toronto architects Henry J. Allward and George R. Gouinlock. The well-regarded partnership rose to prominence in the later half of the 1930s and early 1940s with their commissions of factories, universities and colleges, offices and high-end residential designs. Notably, the firm designed several factory buildings for war-related purposes, including other factory buildings at the John Inglis complex and the Research Enterprises facility at Leaside. Later, the firm gained international renown for their 1948 Mechanical and Engineering Building at the University of Toronto which has been praised as "one of Toronto's most significant mid-twentieth century modern buildings." Other notable projects have included the Sunnyside Hospital (1948), Massey Harris showroom and offices (1948), Veterans Memorial Buildings in Ottawa (1956 and 1962) as well as the International Hockey Hall of Fame (1962) and the Sport Hall of Fame (1966), both at the Canadian National Exhibition. The firm also designed the 1966-68 Royal Ontario Museum's McLaughlin Planetarium.

The property also possesses historical value for its association with the theme of Canada's war effort in the Second World War, for which it served an integral role. The government of Canada financed and owned the Bren Assembly and Test Buildings at 171 East Liberty Street, with the John Inglis Company overseeing the design and construction of the facility, as well its operation.

Designed in 1941, and constructed in early 1942, the property at 171 East Liberty Street manufactured the Bren gun, the primary machine gun used by the Allies in the Second World War. Prior to the completion of the plant at 171 East Liberty Street, Bren guns were initially manufactured at the original John Inglis Company plant. The adjacent property at 9 Hanna Avenue (altered) was constructed during the war in the early 1940s for the company to produce Colt Browning guns.

Development of machine gun manufacturing is one of the most important chapters in the story of Canada's war effort and accomplishments. The John Inglis Company factory turned out more Bren guns than any other Allied facility, and in 1942 was reputed to be the largest automatic small arms plant in the world. The original factory gained prominence in 1941 when the National Film Board featured the facility in a series of photographs used for recruitment purposes. The initiative highlighted the work of the women workers, and specifically "Ronnie the Bren Gun Girl" (Veronica Foster, 1922-2000) from whom the famous "Rosie the Riveter" in the American war effort is modelled.

Following Second World War, the property was known as the "Liberty Building" and concurrently housed numerous factories and light industries for decades.

The property also possesses contextual heritage value for helping to define, maintain and support the area's historical industrial character. From the 1870s through the twentieth century the area was defined by factories and warehouses, as one of the city's primary industrial areas. The property contributes to the character of the area through its form, scale, materials, and factory typology. It is part of a collection of industrial buildings that have already been identified on Toronto's Heritage Register, including the adjacent Part IV designated sites at 40 Hanna Avenue (Brunswick-Balke -Collender Factory) and 80 Lynn Williams Street (Liberty Storage Warehouse), and the Listed site

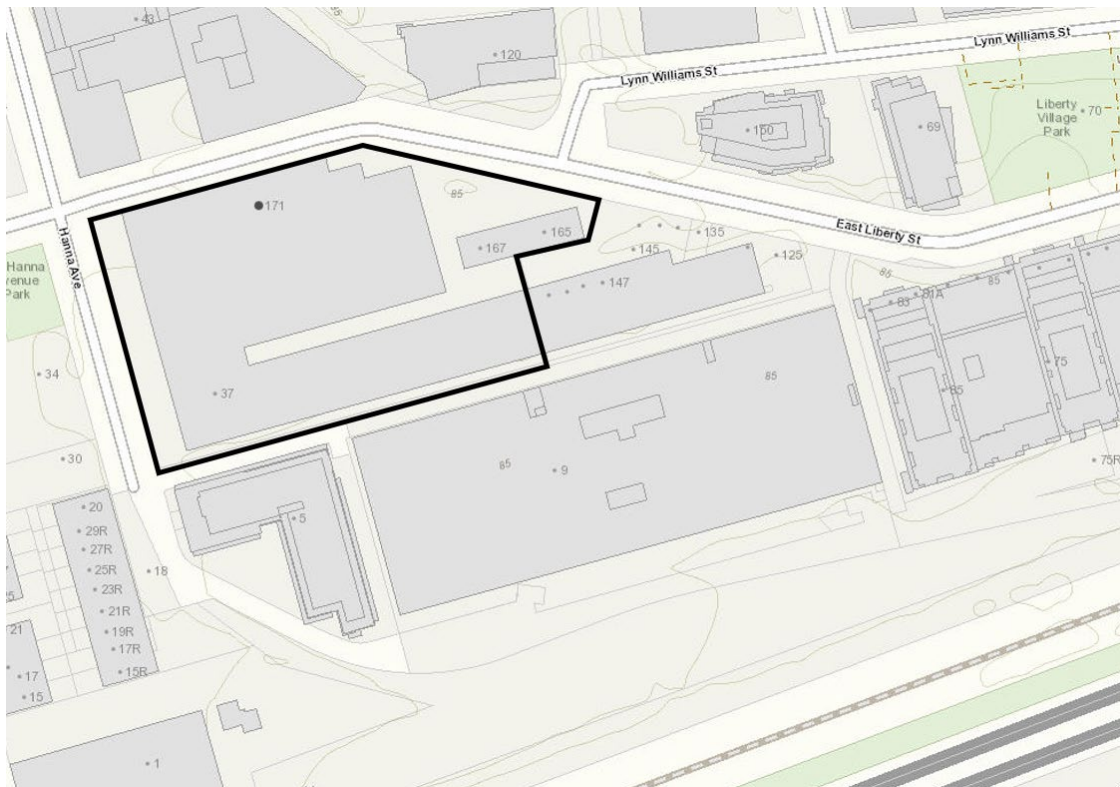
at 43 Hanna Avenue (Hinde and Dauch Paper Company). The rail spur tracks running through the property recalls the site's integral connection to the adjacent railway lines.



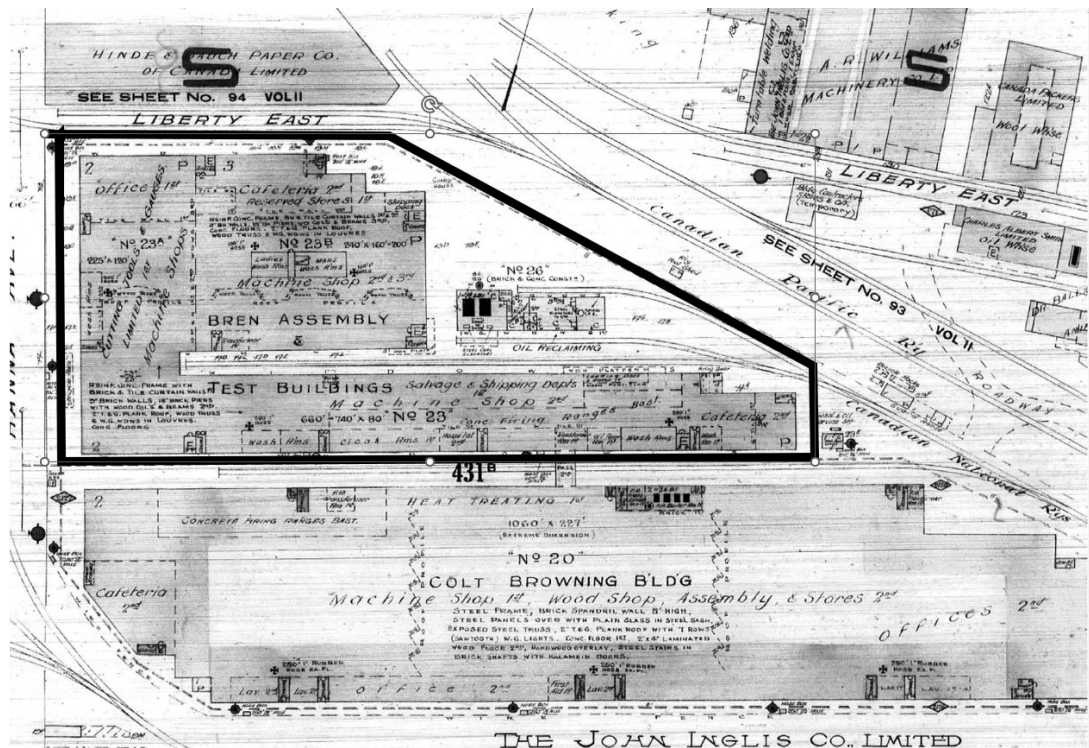
On the left is the building at 165-167 East Liberty Street (north elevation) and on the right is the building at 171 East Liberty Street (east elevations) (City of Toronto Heritage Planning, 2026)



On the left, the west elevation of the building at 171 East Liberty Street and on the right is the building at 37 Hanna Avenue (City of Toronto Heritage Planning, 2026)



The property parcel of 171 East Liberty Street is outlined in black outline (structure addresses of 165-167 East Liberty Street, 171 East Liberty Street, and 37 Hanna Avenue identified). Note: This location map is for illustrative purposes only; the exact boundaries of the property are not shown (City of Toronto Mapping).



A historical map (annotated) from January 1943 showing The John Inglis Company Bren Gun Assembly and Test Buildings complex with historical (not current) boundary shown in thick black outline (City of Toronto Archives)