

SCOPED CULTURAL HERITAGE IMPACT ASSESSMENT

Address

3089 Greenfield Road,
Ayr, Ontario

Client

Greenfield Mill Co.

Project No. 26407

Date May.26.2026

Biglieri

Land Acknowledgement

As descendants of settlers to Canada, one of our goals is to inspire others to take action to support Indigenous communities. One of the ways we can help achieve this is through creating a meaningful and intentional land acknowledgement. Therefore, we respectfully acknowledge that the Subject Site and the Township of North Dumfries is located on the land that was shared between the Attiwonderonk (Neutral), Anishinaabe (Anishinabewaki), Mississauga, Mississaugas of the Credit First Nation and Haudenosaunee peoples.

It is also important to acknowledge that the Township of North Dumfries is situated on territory governed by Treaty 3, 1792, which was an agreement made to clarify the earlier Between the Lakes purchase made in 1784. Treaty 3 is an agreement between the British Crown and the Mississaugas of the Credit First Nation and included approximately 3 million acres of land which includes the North Dumfries for which the Mississauga were compensated according to the Crown. There is ongoing discussion related to the Indigenous interpretations of the Treaty, including whether fully informed consent was given by the Indigenous communities, whether the compensation was adequate, and the acknowledgement of Treaty rights.

We are all treaty people. Many of us have come here as settlers, immigrants, and newcomers in this generation or generations past. We would also like to acknowledge and honour those who came here involuntarily, particularly those who are descended from those brought here through enslavement.

Research Assistance

We would like to acknowledge the research assistance and support that was provided by North Dumfries Historical Preservation Society, Waterloo Region Public Library Local History Collections, Waterloo Generations, Ayr News.

Background Information

Contact Information

The property at 3089 Greenfield Road, Ayr, Ontario (“Subject Site”), is presently managed by Greenfield Mill Co (“Client”). This Scoped Cultural Heritage Impact Assessment has been requested by the Client; their contact information is provided below:

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This Scoped Cultural Heritage Impact Assessment was prepared by The Biglieri Group Ltd. (“TBG”). TBG is an urban planning, design, and heritage consulting firm based out of Toronto and Hamilton that specializes in the conservation and stewardship of cultural heritage resources across Ontario.

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1. INTRODUCTION



The Biglieri Group Ltd. has been retained by Greenfield Mill Co. to prepare a Scoped Cultural Heritage Impact Assessment (“CHIA”) for the property municipally addressed as 3089 Greenfield Road, formerly known as the Greenfield Mill (“Subject Site”- see **Figure 1 - Location Map**). The Subject Site is located within the Greenfield Heritage Conservation District (GHCD”) and therefore is designated under Part V of the *Ontario Heritage Act* (“OHA”) and considered a Protected Heritage Property.

As the proposal requires alteration of a Protected Heritage Property as part of a development application under the *Planning Act*, the Township of North Dumfries (the “Township”) has requested the completion of a CHIA as part of the formal consultation. The CHIA is based on the Township’s CHIA Terms of Reference and has been scoped based on correspondence with Staff (Campos, February 24, 2026) which is attached in Appendix ‘E’.

The proposed development consists of an Official Plan Amendment The proposed development consists of an Official Plan Amendment (“OPA”) to include the site within the Greenfield settlement area and a Zoning By-law Amendment (“ZBA”) to rezone the property for commercial uses including an Event Venue and Restaurant. The proposed development includes the rehabilitation of the Greenfield Mill to be adaptively re-used as a four-season wedding venue. The zoning change will facilitate the re-use of the extant historic building.

The impact assessment analyzes potential impact to identified cultural heritage value as a result of the proposal. Based on the identified CHVI of the property, an impact analysis will be completed to determine potential direct and indirect impacts to the identified value. If the impact assessment concludes that there are adverse impacts to identified cultural heritage value as a result of the redevelopment, alternative development options will be explored and mitigation and conservation recommendations provided as necessary.

Figure 1. **Aerial Context Map**

Google Earth, 2025



2. SITE DESCRIPTION & SURROUNDINGS

2.1 The Subject Site

2.2 Surrounding Area

2.3 Heritage Status and Cultural Heritage Value



2.1 The Subject Site

The Subject Site is located on the south side of Greenfield Road, west of Northumberland Street (Highway 58), east of Trussler Road and north of the Nith River. The Subject Site is legally described as the following:

*PT LT 37 CON 9 NORTH DUMFRIES PT 1, 67R3370;
NORTH DUMFRIES*

The Subject Site is approximately 1.79ha size and irregularly shaped. It contains the former Greenfield Mill and associated supportive features such as the smoke stack, sluice gates and ruins. Access is off a narrow line off of Greenfield Road. The entrance is sloped and the remaining area is open space and wooded areas which includes a concentration of Poplar trees as well as Black Cherry and Hackberry.

The property is included in the residential urban community of Greenfield and historically was an industrial site.

Figure 2. **Location Map**

Google Earth, 2025



2.2 Surrounding Area

The Subject Site is surrounded by low-rise residential uses, industrial/ commercial to the east and agricultural/ natural lands to the south (see **Figure 1**- Aerial Context Map). The immediate surrounding land uses include the following (see **Figure 3** for photographs of the surrounding context):

North: The lands directly north of the Subject Site along Greenfield Road include rural residential lots and agricultural lands. The properties immediately to the north include saltbox worker's cottages and on the north side of Greenfield Road, one storey dwellings.

East: The lands to the east of the Subject Site include rural residential properties and lands zoned industrial that include Ayr's Home Hardware Building Centre and Team Vincent Motorsports.

South: The lands to the south of the Subject Site include an expanse of natural features that primarily are within the Nirth River flood plain; this includes natural wooded areas and open space/ meadows and the Nith River.

West: The lands to the west of the Subject Site includes wood areas, meadows, the Nith River and remnants of the former dam that supported the operation of the historic mill. There are also residences that line the south side of Greenfield Road.

Greenfield Road is characterized as a rural roadscape with naturalized edges and some mature trees. Upon entering the District from the east, it is mostly trees and vegetation in view. During "leaves off" months, the upper brick levels of the Greenfield Mill are visible from this gateway (see **Figure 4** for photographs of Greenfield Road).



Figure 3. **Views of the Surrounding Context from within the Subject Site**

TBG, 2026



1. View looking north-west towards Greenfield Road;
2. View looking westwards towards residences along the south side of Greenfield Road with the remnants of the historic mill race to the bottom left;
3. View looking south west looking towards the Nith River;
4. View looking south-west towards Nith River.
5. View looking westwards towards Northumberland Street and the FS Partners' grain facility.
6. View of area of the proposed new driveway on adjacent lands to the east looking towards Greenfield Road.

Figure 4. **Photographs of Greenfield Road within Vicinity of the Subject Site**

TBG, 2026



1. View looking south east along Greenfield Road from the north side of the road;
2. Looking north-west along Greenfield Road from north side of Greenfield Road;
3. View of Greenfield Road look westwards along south side of Greenfield Road at the entrance or 'gateway' of the District;
4. View of Greenfield Road looking westwards from south side of the road towards the interior of the District.



2.3 Heritage Status and Cultural Heritage Value

The Subject Site is designated under Part V of the OHA as part of the Greenfield Heritage Conservation District (“GHCD”) thereby affording it protection under Section 42 of the OHA. The following sub-sections review the cultural heritage value associated with the GHCD and the individual Site. The attributes of the District are reviewed innately through the review of the GHCD policies and guidelines; potential impacts to the following specific attributes of the Greenfield Mill outlined in sub-section 2.3.2 site are assessed for impact in sub-section 7.3 of this report.

2.3.1 Greenfield Heritage Conservation District

The following Statement is verbatim from the HCD Plan:

Statement of Cultural Heritage Value

The history of Greenfield, as it relates to key heritage resources present today, centers around early Scottish settler John Goldie and his establishment of several mills, most significantly the Greenfield Mill. Goldie arrived and settled in the former Dumfries Township (Canada West) from Scotland in 1848. He established several successful mill sites that included housing for his family and employees as well as a school. Greenfield Mill, established in 1865, was run by the Goldie family until 1910 and continued operating as a mill until 1965. The influence of the Goldie family extended beyond Greenfield and is significant to the history of the local region. John Goldie’s sons had a major impact on the area, with James and John Jr. establishing successful businesses in Galt and Guelph respectively. John Goldie’s youngest son, David, remained in Greenfield and oversaw expansion of the mill there. The Township of North Dumfries had a number of mills but few were as extensive or productive as the Greenfield Mill; none have the same integrity.

Greenfield was one of four rural settlements located on the River Nith in Township of North Dumfries. The history of Greenfield is fairly typical of other rural association with John Goldie’s botanical interests and for the success and expansion of the milling operation over a long period of time.

While many other mill centres disappeared, Greenfield was well known for its products such as Goldie Star flour across Canada and abroad. The villages of Nithvale and Jedburgh have been absorbed into Ayr, but Greenfield survives as a distinct community. Greenfield is unique in that it was not located on a major railway line prior to 1879 but remained competitive, teaming goods to Paris along the Ayr-to-Paris toll road, constructed in 1848. The construction of a railway siding in 1879 to connect the Greenfield Mill with the Credit Valley line in Ayr reflects the considerable size of the Goldie milling business at that time. The rail connection lead to further expansion and the mill remained profitable into the twentieth century long after most mills in Dumfries had ceased to operate. There are many protected heritage resources within Greenfield Heritage Conservation District, centered on the settlement of John Goldie and his establishment of several mills, primarily the Greenfield Mill. Architecturally, the Greenfield Mill, Goldie Manor, River House, and “saltbox” workers’ cottages are contributing resources because they typify building styles and construction techniques occurring in early, rural settlements. The Greenfield Mill is particularly significant as a mill site that evolved over 100 years (c. 1865-1965) and includes intact buildings, river dam remnants, sluice gates remnants, mill pond, mill race, remnant railway siding, archaeological resources and industrial artefacts. When considered as a whole, along with the Greenfield School(Union School No. 15), these contributing resources collectively represent a cultural heritage Landscape of Euro-Canadian mill settlement in a rural hamlet. There is a distinctly different character to Greenfield when compared to adjacent roads and development.

The contextual value of Greenfield is largely marked by rolling topography and the long, semi-enclosed viewsheds looking east and west along Greenfield Road corridor. The diversity of housing types, massing, and set-backs interspersed with agricultural lands and natural areas relate to the historical context of the village and the evolution of development here. Greenfield contains a matrix of landscape typologies ranging from riparian lands surrounding the Nith River and Eden Creek, valley lands and wetlands to flat areas where development has taken place, to rolling, fertile agricultural lands. Mature vegetation planted by Goldie is a significant tangible link to Greenfield's origins. This results in a cross-sectional rhythm for the entire length of Greenfield Road and directly relates to the development patterns of John Goldie and the other early European settlers. Together, these elements contribute to cultural heritage value of Greenfield Heritage Conservation District.

Figure 5. **Greenfield Heritage Conservation District Boundary**

Greenfield Village, Heritage Conservation District Plan, 2014





Heritage Attributes

The heritage attributes that articulate the cultural heritage value of Greenfield Heritage Conservation District include:

- Greenfield Road between Trussler Road and Northumberland Street in the Township of North Dumfries
- Long, semi-enclosed corridor
- East-west viewshed
- The streetscape; narrow road width, no street lights, no sidewalks, no curbs or gutters; open swales and vegetation along right-of-way associated with rural settlement
- Intact pattern of Euro-Canadian settlement in a rural hamlet
- Contributing Resources located along the road
- Barns and outbuildings
- Significant views to contributing resources
- Physical associations with the Nith River
- Nith River as a tributary of the Grand River Canadian Heritage River System
- Intervention to the Nith River to supply the Greenfield Mill with water power
- Historical associations with John Goldie and the Goldie family
- Ontario Heritage Trust commemorative plaque of the significance of John Goldie Botanical interests of John Goldie illustrated by exiting mature vegetation
- Greenfield Mill (3089 Greenfield Road)
- Historical associations with Goldie Star Flour
- Intact buildings that have evolved over time
- Industrial heritage attributes of the former Greenfield Mill, including:
 - River dam remnants
 - Sluice gates remnants
 - Mill pond
 - Mill race
- Historical association to Credit Valley Railway; siding constructed in 1879
 - Remnant railway siding
- Goldie Manor (3144 Greenfield Road)
 - Including barns and outbuildings
 - Association with Eden Creek
- River House (White House) (3185 Greenfield Road)
- Five workers' cottages located on Greenfield Road (3161, 3163, 3167, 3169, 3175 Greenfield Road), as well as other contributing resources located within Greenfield Heritage Conservation District
- Former Greenfield School (Union School No. 15, "Beehive School") (3206 Greenfield Road)
- The overall evolved cultural heritage landscape, including the interconnections between the before mentioned heritage attributes.

2.3.1 Subject Site

A Statement of Cultural Heritage Value and heritage attributes were identified in the GHCD Plan (2014) for the Greenfield Mill. The following provides the Statement and attributes from the Plan:

Greenfield Mill Complex

The Greenfield Mill Complex (3089 Greenfield Road) contains remarkably intact large milling complex that contains buildings and man-made features that reflect changes in milling practices from the nineteenth and twentieth century including the transition from waterpower to steam power.

Buildings from the first phase of development use locally sourced building materials. The four-storey mill building was constructed in 1865 of large regularly coursed fieldstone blocks. The four-storey grain storehouse attached to the rear is timber-frame with walls constructed of stacked-planks. Stacked-plank construction is a technique that was once common in Ontario where sawmills operated, before the railways were established. This technique allowed for large buildings to be easily constructed at a time when skilled carpenters were rare.

It was not uncommon for early mills and grain storage bins to be built this way but surviving examples of stacked-plank construction in Ontario are rare. There are examples at the Williamsford Mill, the Neustadt Mill, the Caledonia Mill and the Coldwater Mill. The Mill is large and sturdily built. It is typical of large mid-nineteenth century mills located on major rivers and their tributaries in southern Ontario. The corners and the windows openings are reinforced with large blocks to allow for an open interior to house the milling equipment. Two storeys constructed in brick were added to the mill in the 1890s.

Other alterations were made to accommodate technological developments in milling, such as the change from mill stones to porcelain rollers in 1889, the change from water power to steam power in the 1890s. Remnant of the former railway siding are still visible and there are industrial artefacts on the site including the fire pump house in a separate brick building on the west side of the Mill. The Mill site includes a long mill race constructed to divert water from the Nith River to power the Mill. Remnants of the dam and sluice gates have survived. The mill pond and head of the mill race are clearly defined despite low water levels. The tail race is less visible but its outline is still discernible. The arched opening where water entered the Mill is now below grade and no longer visible. The connection between the Goldie family and the Greenfield Mill ends in the early twentieth century but the Mill continued to operate under new ownership. In 1910, the Mill left Goldie ownership but David Goldie's son John continued to run the Mill until 1922. Some renovations were carried out in 1910 to install new machinery to produce 'Force' cereal for the Canadian subsidiary of an American company called Hecker-H-0 Co. In 1945 the property was sold to Best Foods Canada and the Mill was repurposed to manufacture margarine and mayonnaise. In 1965 this facility closed and from that period till the present the Mill building has been used for warehousing and offices by a number of businesses. No major changes have been made to the Mill since that time. The main interior areas of the Mill building and storehouse are in good condition. Unused sections of the building and extant outbuildings have been abandoned and are in a poor state due to lack of maintenance.



Greenfield Mill Heritage Attributes

- Historical associations with Scottish settler John Goldie and his establishment of the earliest water-powered mill on this section of the Nith River;
- Historical association with the Greenfield Milling Company, one of the largest flour mills in North Dumfries that supplied an international market;
- Physical/design value as a four-storey stone mill and attached four-storey stacked-plank storehouse built by David Goldie between 1863 and 1865 and additional brick storeys added in the 1890s;
- Physical design value as rare example of a large intact milling site that evolved from water-power to steam power in the second half of the nineteenth century and continue to operate until 1965. The milling site includes a mill with attached storehouse, separate mill office, remnant dam, sluice gates, mill pond and mill race, as well as industrial artefacts including remnant railway lines and a cast iron fire pump housed in a separate brick structure;
- Physical/design value as a rare example of stacked plank construction from the 1860s used to construct a large grain storehouse attached to a mill building; and,
- Physical/design value as a typical example of a large fieldstone mill constructed in the 1860s, similar to other examples in the Township including the Goldie Mill in Guelph which was constructed around the same time.

3. POLICY FRAMEWORK

3.1 Planning Act

3.2 Provincial Planning Statement (2024)

3.3 Ontario Heritage Act

3.4 Ontario Heritage Tool Kit

3.5 Waterloo Region Official Plan

3.6 Township of North Dumfries Official Plan

**3.7 Greenfield Heritage Conservation District
Plan**

3.8 Zoning By-law 689-83



3.1 Planning Act

The Planning Act, R.S.O. 1990, c. P.13 (the “Planning Act”) is provincial legislation that sets out the ground rules for land use planning in Ontario. It describes how land uses may be controlled, and who may control them. The Planning Act includes several sections that speak to matters relating to cultural heritage, including those matters of provincial interest in Section 2, which among other matters, states that:

2 The Minister, the council of a municipality, a local board, a planning board, and the Tribunal, in carrying out their responsibilities under this Act, shall have regard to, among other matters, matters of provincial interest such as,

(d) the conservation of features of significant architectural, cultural, historical, archaeological, or scientific interest; [...].

In order to refine the matters of provincial interest described in Section 2 of the Planning Act, the Minister of Municipal Affairs and Housing, or the Minister together with any other minister of the Crown, issues policy statements on matters relating to municipal planning that are of provincial interest. In this regard, the 2024 Provincial Policy Statement was prepared, which sets the rules for land use planning in Ontario.

3.2 Provincial Planning Statement (2024)

On August 20, 2024, the Ministry of Municipal Affairs and Housing (“MMAH”) released a new Provincial Planning Statement (“2024 PPS”), which came into force and effect on October 20, 2024. The 2024 PPS is intended to be a streamlined land use policy framework and has replaced the 2020 Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe 2019. It builds on housing-supportive policies from both documents and provides municipalities with the tools and flexibility to increase housing supply, align development with infrastructure for a competitive economy, support rural viability, and protect agricultural lands, the environment, and public health and safety.

In this regard, Section 4 of the 2024 PPS provides policy direction on the wise use and management of resources in Ontario, including cultural heritage and archaeological resources. Section 4.6 specifically provides policy direction on cultural heritage and archaeology, providing the following policies:

1. *Protected heritage property, which may contain built heritage resources or cultural heritage landscapes, shall be conserved.*
2. *Planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the significant archaeological resources have been conserved.*
3. *Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property unless the heritage attributes of the protected heritage property will be conserved.*

4. *Planning authorities are encouraged to develop and implement:*
 - a) *archaeological management plans for conserving archaeological resources; and*
 - b) *proactive strategies for conserving significant built heritage resources and cultural heritage landscapes.*
5. *Planning authorities shall engage early with Indigenous communities and ensure their interests are considered when identifying, protecting, and managing archaeological resources, built heritage resources and cultural heritage landscapes.*

Accordingly, the policies of 4.6.1 and 4.6.4 apply to as it relates to understanding the significance of the heritage value that is tied to the Subject Site, and therefore, have been captured in this report. The focus for heritage conservation in Ontario, as per the 2024 PPS, has now shifted to conserving protected heritage properties, which means properties inventoried, listed (non-designated) properties are not provincial priorities for conservation. This Subject Site is considered of significant cultural heritage value and a Protected Heritage Property as per the PPS 2024.

A protected heritage property is a defined term in the 2024 PPS, and means property designated under Part IV or VI of the Ontario Heritage Act; property included in an area designated as a heritage conservation district under Part V of the Ontario Heritage Act; property subject to a heritage conservation easement or covenant under Part II or IV of the Ontario Heritage Act; property identified by a provincial ministry or a prescribed public body as a property having cultural heritage value or interest under the Standards and Guidelines for the Conservation of Provincial Heritage Properties; property protected under federal heritage legislation; and UNESCO World Heritage Sites.

Significant heritage resource is also a defined term in the 2024 PPS and means, in regard to cultural heritage and archaeology, “resources that have been determined to have cultural heritage value or interest. Processes and criteria for determining cultural heritage value or interest are established by the Province under the authority of the Ontario Heritage Act”.



3.3 Ontario Heritage Act

The *Ontario Heritage Act*, R.S.O. 1990, c. O.18 (the “Heritage Act”), is provincial legislation that sets out the ground rules for the protection of heritage properties and archaeological sites in Ontario. The Heritage Act came into force in 1975, and has been amended several times, including in 2005 to strengthen and improve heritage protections in Ontario, and in recent years through Bill 108 in July 2022, in November 2022 through Bill 23, in December 2023 through Bill 139, and then again in June 2024 through Bill 200, (i.e., the Homeowner Protection Act, 2024).

Under the Heritage Act, O. Reg. 9/06 sets out the criteria for determining cultural heritage value or interest for properties that may be designated under Section 29 of the Heritage Act, which were amended following Bill 23 through O. Reg. 569/22. Bill 23 received Royal Assent on November 28, 2022, and has now been enacted as Chapter 21 of the Statutes of Ontario, 2022.

Under Bill 23, “listing” a property on the Register requires that they meet one or more of the prescribed criteria set out in O. Reg. 9/06 (Criteria for Determining Cultural Heritage Value or Interest) under the Heritage Act. Furthermore, to “designate” a property under Part IV of the Heritage Act (i.e., an individual designation), properties must now meet two or more of the nine prescribed criteria set out in O. Reg. 9/06. These criteria are as follows:

1. *The property has design value or physical value because it is a rare, unique, representative, or early example of a style, type, expression, material, or construction method.*
2. *The property has design value or physical value because it displays a high degree of craftsmanship or artistic merit.*
3. *The property has design value or physical value because it demonstrates a high degree of technical or scientific achievement.*
4. *The property has historical value or associative value because it has direct associations with a theme, event, belief, person, activity, organization, or institution that is significant to a community.*
5. *The property has historical value or associative value because it yields, or has the potential to yield, information that contributes to an understanding of a community or culture.*
6. *The property has historical value or associative value because it demonstrates or reflects the work or ideas of an architect, artist, builder, designer, or theorist who is significant to a community.*
7. *The property has contextual value because it is important in defining, maintaining, or supporting the character of an area.*
8. *The property has contextual value because it is physically, functionally, visually, or historically linked to its surroundings.*
9. *The property has contextual value because it is a landmark.*

3.4 Ontario Heritage Tool Kit

The Ontario Heritage Tool Kit (“OHTK”) is a series of guides that are designed to help illustrate the heritage conservation process in Ontario. The OHTK guides explain the steps to undertake the identification and conservation of heritage properties using the Ontario Heritage Act. They also describe the roles that community members can play in municipal heritage conservation, as participants on municipal heritage committees, or through local research conducted by groups with an understanding of heritage.

Following recent amendments to the Heritage Act, the OHTK was updated to assist users to understand the changes. The updated OHTK debuted in May of 2025. The original OHTK consist of five documents. The documents entitled “Designating Heritage Properties” is the most applicable to this CHIA. The “Heritage Conservation Districts” document is a guide to municipal designation of Heritage Conservation Districts under the Ontario Heritage Act and their conservation thereafter. Chapter 4 of this guide speaks to the management of districts including the review of alteration, new construction, demolition and removal (4.1). This section will help guide the analysis of the proposed development in Section 7.0 of this report.

3.5 Waterloo Region Official Plan

As of January 2025, the Waterloo Region Official Plan (ROP) is now administered by the seven local municipalities including the Township of North Dumfries; this is a result of changes implemented through *Bill 23: the More Homes Built Faster Act, 2022*.

Section 3.G of the Official Plan outlines the policies relevant to cultural heritage. This includes the identification of cultural heritage resources which includes a region-wide inventory of cultural heritage resources, cultural heritage landscapes, archaeology, heritage planning advisory committee, cultural heritage impact assessments, conservation, promotion and research and scenic roads. A CHIA is required for proposed development when it includes or is adjacent to a designated property:

3.G.13 Area municipalities will establish policies in their official plans to require the submission of a Cultural Heritage Impact Assessment in support of a proposed development that includes or is adjacent to a designated property or Cultural Heritage Landscapes, or includes a non-designated resource of cultural heritage value or interest listed on the Municipal Heritage Register.

Section 3.G. 17 identifies the required contents of the Cultural Heritage Impact Assessment:

3.G.17 Cultural Heritage Impact Assessment will include, but not be limited to the following:

- a. historical research, site analysis and evaluation;
- b. identification of the significance and heritage attributes of the cultural heritage resource;



- c. description of the proposed development or site alteration;
- d. assessment of development or site alteration impacts;
- e. consideration of alternatives, mitigation and conservation methods;
- f. schedule and reporting structure for implementation and monitoring; and
- g. a summary statement and conservation recommendations.

The following provides policies related to the conservation and integration of cultural heritage resources within developments and the promotion of reuse or adaptive reuse if it is not feasible to conserve a cultural heritage resource in-tact. It also includes a policy relevant to the waiving or scoping of a Cultural Heritage Impact Assessment which has been applied to this project following correspondence.

3.G.18 Where a Cultural Heritage Impact Assessment required in this Plan relates to a cultural heritage resource of Regional interest, the conservation recommendations will, wherever feasible, aim to conserve cultural heritage resources intact by:

(a) recognizing and incorporating heritage resources and their surrounding context into the proposed development in a manner that does not compromise or destroy the heritage resource;

(b) protecting and stabilizing built heritage resources that may be underutilized, derelict, or vacant; and;

(c) designing development to be physically and visually compatible with, and distinguishable from, the heritage resource.

3.G.19 Where it is not feasible to conserve a cultural heritage resource intact in accordance with Policy 3.G.18, the conservation recommendations will:

(a) promote the reuse or adaptive reuse of the resource, building, or building elements to preserve the resource and the handiwork of past artisans; and,

(b) require the owner/applicant to provide measured drawings, a land use history, photographs and other available documentation of the cultural heritage resource in its surrounding context.

3.G.20 Cultural Heritage Impact Assessments may be scoped or waived by the Region or the area municipality as applicable.

The proposal includes the removal of a portion of the existing building and is proposed for adaptive reuse.

3.6 Township of North Dumfries Official Plan

Chapter 7 of the Official Plan outlines policies related to heritage resource management in the Township. This includes the Registry of Cultural Heritage Resources, Designation of Heritage Properties, Cultural Heritage Landscapes, Cultural Heritage Impact Assessments, Archaeological Resources, Cemeteries and Burial Places and the Grand River Corridor. The objective of these policies is to conserve and enhance cultural heritage resources.

The Township has a Registry of Cultural Heritage Resources that operates as their adopted Municipal Heritage Register as per Section 27 of the OHA. This includes listed (non-designated) and protected heritage properties including the Subject Site which is designated under Part V of the OHA. Policies are included that speak to the designation of a Heritage Conservation District. It states that Heritage Conservation Districts may include in Section 7.3.2.:

- a. *a significant number of the buildings reflect an aspect of the history of the community by nature of location and historical significance of setting;*
- b. *significant number of the buildings are of a style or architecture or a method of construction to be significant historically or architecturally at a local, regional, provincial, national or international level;*
- c. *district contains other important physical, archaeological, environmental, cultural or aesthetic characteristics that in themselves do not constitute sufficient grounds for the designation of a district, but which lend support in evaluating the criteria for designation;*
- d. *or, the district is an area of special association that is distinctive within the township and, as a result, contributes to the character of the entire community.*

The Subject Site is located within the Greenfield Heritage Conservation District which was designated under Part V of the OHA. Section 7.5 outlines the policies relevant to Cultural Heritage Impact Assessments. The Township states that the submission of a CHIA will be required for any proposed development or site alteration that includes or is adjacent to a designated or listed (non-designated property). The CHIA should include the following content:

- a. *historical research, site analysis and evaluation;*
- b. *identification of the significance and heritage attributes of the cultural heritage resource;*
- c. *description of the proposed development or site alteration;*
- d. *assessment of development or site alteration impacts;*
- e. *consideration of alternatives, mitigation and conservation methods;*
- f. *schedule and reporting structure for implementation and monitoring; and*
- g. *a summary statement and conservation recommendations.*

Section 7.5.2. allows for the municipality, in consultation with the Municipal Heritage Committee, to scope or waive a CHIA. The Township has agreed to the scoping of the report (Campos, 2026). The Township states that it considered a series of alternatives for conservation as follows, in order of preference:

- a. *rehabilitate and incorporate the heritage resource(s) and its surrounding context into the proposed development;*
- b. *recognize and incorporate the cultural heritage resource(s) and its surrounding context into development applications in a manner which does not conflict with the heritage resource;*
- c. *promote the use of scale and design in new developments which blends harmoniously with existing cultural heritage resources;*



- d. *promote the re-use of the resource, building, or building elements where the heritage resource cannot be conserved intact; and,*
- e. *require, prior to approving a development application that would result in the destruction of a heritage resource, that the applicant provide measured drawings, a land use history, photographs and other available documentation of the heritage feature in its surrounding context and, if feasible, relocate the heritage resource.*

The proposal includes the retention and restoration of the original stone mill (1860) of the Greenfield Mill to be adaptively reused and integrated new, contemporary additions. The impact of this approach is assessed in Section 8 of this report.

The Subject Site is located within the Greenfield rural settlement areas as per Map 2 entitled “Planned Township Structure”. The site is also located within an area of environmental constraints (Map 5b) and within lands designated as “Prime Agricultural Area” as per Map 7 of the Official Plan.

3.7 Greenfield Heritage Conservation District Plan

The Greenfield Heritage Conservation District Plan (“GHCD”) was completed in March of 2014 by Taylor Hazell Architects, GSP Group and Golder Associates. The Greenfield Heritage Conservation District is bound by Northumberland Street to the east and Trussler Road/ town Line Road to the west. The Plan’s principles are as follows:

- Heritage conservation fosters community revitalization;
- Heritage conservation encourages tourism;
- Heritage conservation can enhance property values;
- Heritage conservation may create jobs and develops skills;
- Heritage conservation fosters a sense of place, encouraging distinct and attractive areas for residents, workers, and visitors;
- Heritage conservation enhances local cultural life; and,
- Heritage conservation is sustainable.

The overall objectives of the Plan are identified as follows:

- To acknowledge and protect the cultural heritage value of Greenfield Road;
- To ensure the long-term conservation and management of contributing resources in Greenfield, including significant properties, landscapes, views, and historical associations; and,
- To establish a planning process that takes a “change management” approach for cultural heritage conservation.

The Plan includes policies and guidelines for the conservation of the District. These policies and guidelines are reviewed in Section 7.0 of this report.

Other policies that are discussed in the HCD Plan include that of Zoning and Site Plan Control as follows:

7.3.1 Zoning Policies

a) The current Zoning of properties located in the Greenfield Heritage Conservation District shall apply;

b) Any proposed Zoning By-law Amendment that may apply to Greenfield Heritage Conservation District must demonstrate that the cultural heritage value and the contributing resources of Greenfield Heritage Conservation District shall be conserved.

The proposal includes a proposed Zoning By-law Amendment. The intention of this Scoped CHIA is to assess the compatibility of the proposal within the context of the District; this is completed in Section 7.0 of this report. Mitigation and conservation measures are included in Section 8.0.

7.4 Site Plan Control

The Site Plan Control process helps ensure appropriate siting and massing of new development and addresses efficiency of land use, servicing, safety, attractiveness and compatibility. In accordance with section 8.8 of the Official Plan, all lands within the Township of North Dumfries are deemed to be a Site Plan Control Area, excluding the follow forms of development:

- *Farming and farming related development; and*
- *Single, semi-detached and duplex dwellings, except where lands are within or abutting lands designated Open Space.*

- *Site Plan Control has been used in the Township of North Dumfries to regulate environmental concerns as well as compliance with setback, scale and form of development.*
- *Site Plan Control should continue to be required to ensure that redevelopment is appropriately reviewed and that the Design Guidelines included in the Greenfield Heritage Conservation District Plan are being applied.*

7.4.1 Site Plan Control Policies

a) When a Site Plan Application is received for lands within Greenfield Heritage Conservation District, the application must demonstrate that it is consistent with the Greenfield Heritage Conservation District Plan and Guidelines.

The proposal will require Site Plan Approval. As mentioned above, the intention of this Scoped CHIA is to assess the compatibility of the proposal within the context of the District; this is completed in Section 7.0 of this report. Mitigation and conservation measures are included in Section 8.0.

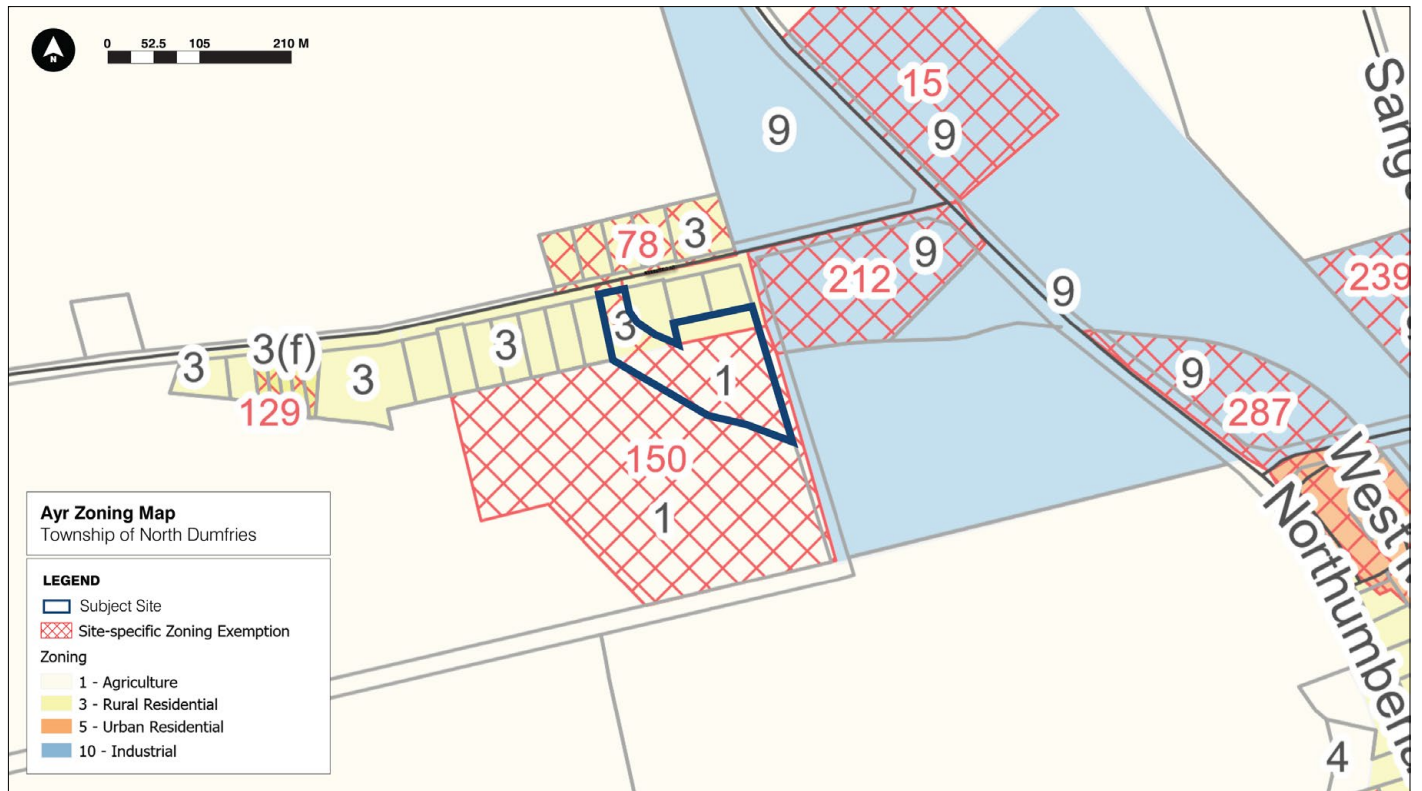


3.8 Zoning By-law 689-83

The Subject Site is currently zoned as Agriculture with Site Specific Zoning (20.1.150) which establishes minimum lot area and frontage requirements. Adjacent properties include agriculture, rural residential, and industrial uses. Uses, however, within the District is limited to Zone 1- agricultural zone on the southern half of the property which permits farming and related uses and Zone 3 which is a residential zone which permits residential uses in the form of single detached dwellings, bed and breakfast establishments, group homes, home occupations, and accessory uses.

Figure 6. **Township of North Dumfries Zoning Map**

Zoning By-law 689-83



4. DEVELOPMENT PROPOSAL



The proposed development includes the adaptive reuse of the existing building on the Subject Site which is locally known as the former “Greenfield Mill”. The intent is to redevelop the site as an event venue/ four season wedding venue and restaurant. The Owner is requesting that the developable portion of the Site and the municipal road allowance be redesignated as “Settlement Core Area” on Map 2.8 and those developable areas removed as being designated as “Core Environmental Features and Significant Valleys” (Map 5A), “Environmental Constraints Areas” (Map 5B), “Hazard Lands” (Map 5C) and “Prime Agricultural Area” (Map 7). The Owner is also requesting that the developable portion of the Site and the municipal road allowance be rezoned from “Z.3” and “Z.1” to a site-specific “Zone 7 (Z.7) – Holding Provision” and the removal of site-specific regulation 20.1.150. (see **Appendix ‘A’**- Conceptual Plan, Elevations and Renderings and **Appendix ‘C’** for the Demolition Plan).

The property would include 1, 394 square metres of event space, 465 square metres of restaurant space, 465 square metres of kitchen space and 465 square meters of common/ shared/ storage space (total of 2, 251m²). The proposal will include a restaurant, kitchen, bar, retail, lobby, reception, cocktail lounge/ event space, ceremony room, bridal suite, wine cellar/ meeting room, groom suite/ golf simulator room, office/ meeting space, storage, washrooms, services, shipping/ receiving, circulation.

The adaptive reuse of the building includes the following:

- Removal of the existing plank (nail-lamb) wing (formerly operated as the grain house) and retention of associated rubble stone foundation and retention of stone foundation;
- Restoration of stone mill with the removal of the existing two storey brick masonry addition above and restoration of original gabled roofline;

- The construction of a new wing located south of the original stone mill with elevator;
- One storey glazed addition above the restored stone mill;
- Filling in of select openings and extension of openings;
- Addition of accessibility features such as a ramp and new accessible entrances;
- New window frames and doors; and,
- Repurposing salvaged brick masonry for hardscaping and plank construction for installation and exposure within the new wing.

The removal of the rear plank wing is due to the condition of this structure as described in Section 6.0 of this report and in Appendix ‘D’. The two-storey brick masonry addition above the original stone mill is proposed to be removed as the intent is to restore the original stone structure and associated gable roofline. The glass addition allows for additional ceiling height and natural light while keeping the stone walls and stone gable visually prominent. Accessibility within the building complex was a key consideration for the adaptive re-use of the building. The existing elevator’s placement will not function with the overall building circulation unless there was an addition proposed to the front façade which is not recommended. Its current placement would require corridor down the centre of the floor plate which would preclude the use of the building as a gathering space.

The proposal includes the restoration of the existing chimney stack on site and stabilization and restoration of related mill infrastructure as part of the use provided by the venue; this includes outdoor event space. There is an intention that the existing archways associated with the mill race along the east elevation will be opened.

The Scoped Environmental Impact Study states that “-Approximately 0.4ha of cultural meadow area and 0.4ha of cultural woodland will be removed to accommodate the development”. The proposal includes the permanent loss of approximately 0.25 ha of the Deciduous Forest and 0.4 ha of Cultural Woodland communities (Acardis, 2026, pp.32). It is proposed that new tree plantings will be used to replace those that are removed.

The proposal includes two large parking areas including two large parking areas containing a total of 110 surface parking spaces are dedicated to the use of the property. A loading space to the rear of the building and 6 barrier free spaces are also proposed for the site. The site will be accessed from a new driveway to the east of the Site from Greenfield Road and the existing access will be closed.



Figure 7. **Site Plan**

Martin Simmons Sweers Architects, 2026

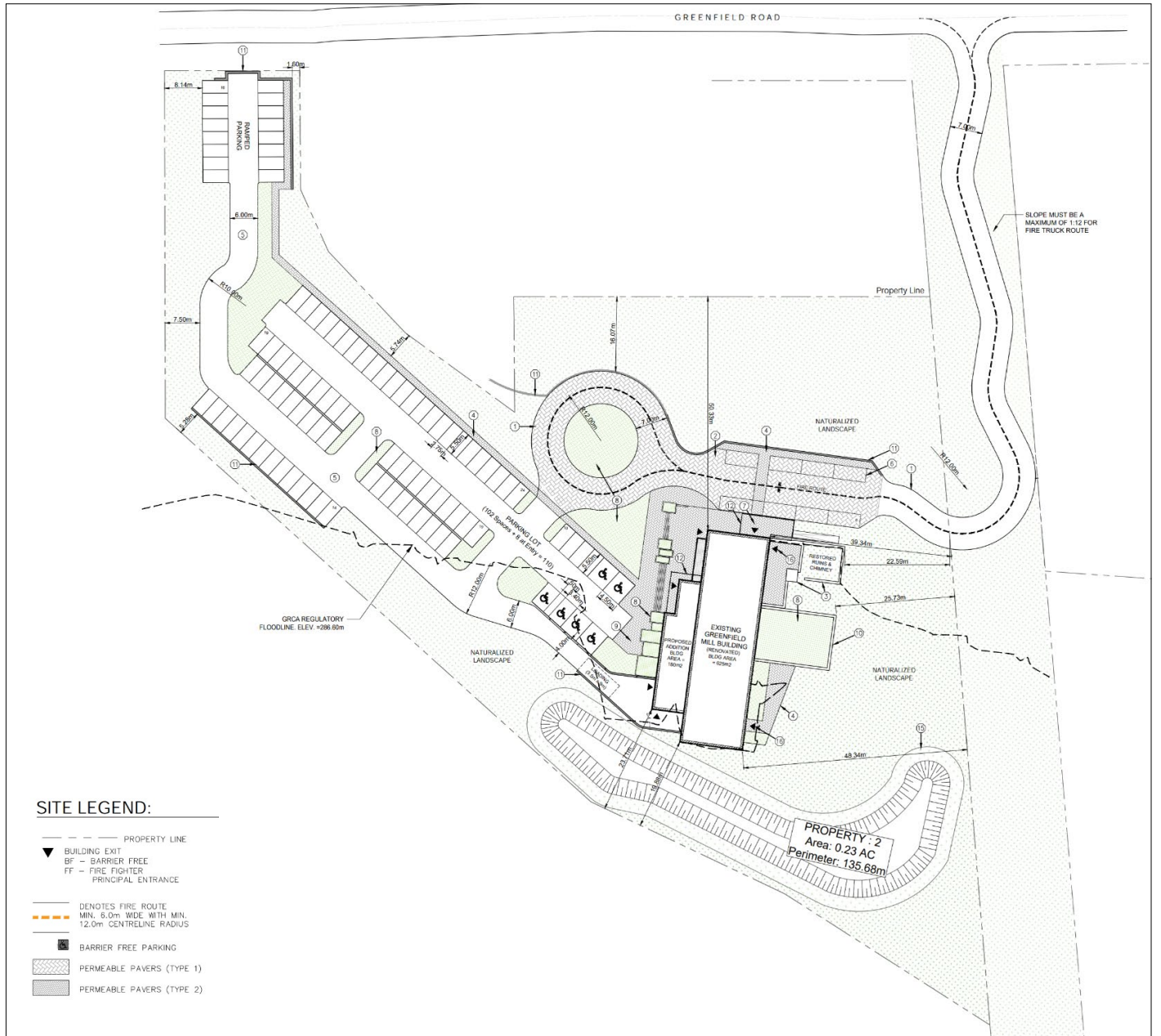


Figure 8. Elevations and Proposed Use

Martin Simmons Sweers Architects, 2026

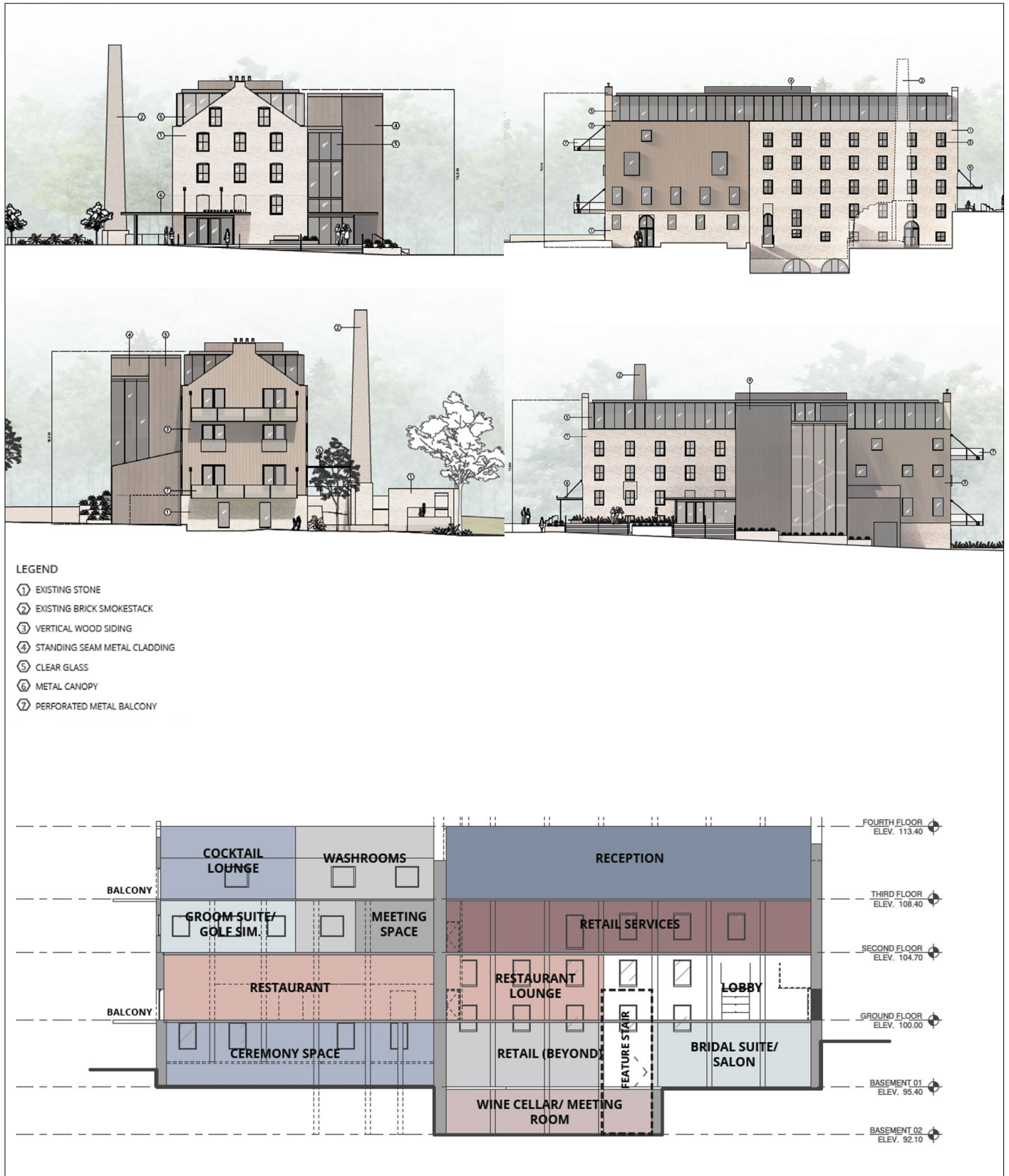




Figure 9. **Coloured Conceptual Renderings**

Martin Simmons Sweers Architects, 2026



Figure 10. **East and South Elevations (Proposed Demolitions and Restoration)**

Martin Simmons Sweers Architects, 2026

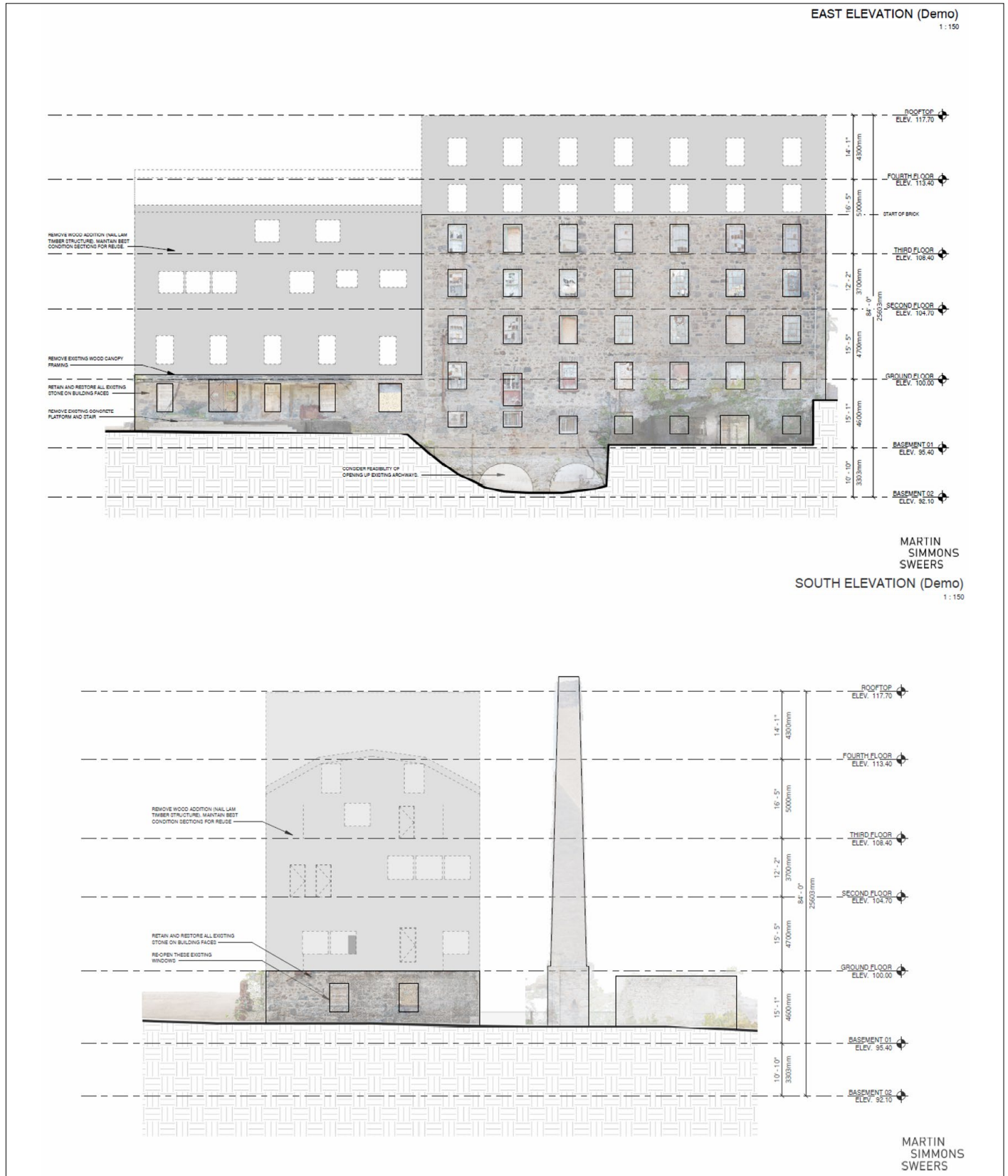




Figure 11. **West and North Elevations (Proposed Demolitions and Restoration)**

Martin Simmons Sweers Architects, 2026



5. HISTORICAL OVERVIEW



This section is not intended to provide an exhaustive history of the site, but rather to provide a general historical overview and narrative of the physical evolution of the site.

The Greenfield community was settled by John Goldie who originally came to Canada between 1817 and 1819. John was a Scottish botanist and as part of his travels he collected plant specimens. He became associated with the Botanic Gardens of Glasgow in his homeland, Scotland, where he met his good friend David Douglas, namesake of the Douglas Fir (Falkner). It was Sir William Jackson Hooker, professor of botany, that encouraged John to go on his early expedition to Canada where he attributed the name “Goldie Fern” to one of his discoveries after John Goldie.

In 1844, John returned to settle on a farm within Lots 37 and 38 in Concession 9 with within the Township of North Dumfries. With him came his family including his wife, two sons, John and David, and his four daughters; he named the settlement “Greenfield” after a place near their home in Scotland (Falkner). He had two sons, William and James, who had travelled alternatively to the United States, who later joined him. At first, a sawmill, raceway and dam were constructed near the Greenfield Dam. Soon, they were working on a raceway for, as John Goldie wrote, “-erection of an oatmeal mill, one of the best paying concerns in the country. We will have hard scraping to get it erected” (Falkner). As the sawmill proved to be unprofitable, they decided to build a flour mill with the oatmeal mill (Falkner). He also spoke to the machinery stating “-we are getting ready for the wheel to be put in. It is to be a horizontal one on a total new plan and we are going to put in a run of flour stones and get another for oatmeal” (July 27, 1849). Two runs of stones were driven by a turbine water wheel (Falkner).

By 1850, the Goldie Family had established an operating grist and oatmeal mill. In 1865, the mill was enlarged with the plank wing (formerly used as the grain house) for the production of refined local wheat for an international market.

Features that supported the mill including the mill pond, dam, sluice gates and mill race.

The Historical County Map of Waterloo County published by Tremaine in 1861 identifies the Goldie Mill under the initials “G.M.” and a black square which indicates a built feature just east of the Nith River and mill pond. There is a road shown on the map that is delineated directly straight from Greenfield Road to the east of the mill. The land is shown under the ownership of David Goldie, John Goldie’s son. David, who was taking over more of the responsibility of the mill, entered into an agreement in 1863 to cut a mill race 4’ on each side with 2’ path on the edge of the raceway; this mill race was still in operation in 1959. In 1880, new machinery was installed to manufacture flour on the new Hungarian roller process system, a system that was pioneered by the Goldies (Falkner).

The 1881 Illustrated Historical Atlas of the County of Waterloo depicts the mill identified as “Grist Mill” and broadly as “Greenfield Mills” and shows that the internal roadway had transitioned to an arched driveway. Note that the existing driveway consists of only the western portion of the drive which is proposed to be closed. Due to a great flood in 1883, the dam was subsequently lengthened and raised a foot and new headgates were added and a protection dike installed from the head gates to the road (Falkner). Upon the death of John Goldie Sr., David became the proprietor of the mill. In 1889, it was estimated that there was an annual output of 125,000 barrels transferred in approximately 1,000 railway cars (Falkner).

An article published October 12, 1889, in *The Saturday Globe* entitled "A Day in Ayr" mentions the Greenfield Mill as an important industry:

Another important industry, located at Greenfield, about a mile up the Nith, is the extensive flouring mills of Mr. David Goldie. The business was established in 1850 by the late John Goldie- than which a more honour named has never been identified with the affairs of either the village or county- and conducted by him on the "old process systems, but with marked success, until 1865, when a new structure, more in keeping with increasing requirements of the business, was erected and the industry entered upon an era of still greater prosperity. The main portion, or that containing the flouring appliances of this, one of unquestionably the model mills of Ontario, is a substantial 44 x 88 feet stolid stone structure, five storeys in height, fitted nine years ago with machinery for the manufacture of flour on the new process system.... A 44 x 65 attachment, of similar height, in the rear constitutes a grain warehouse" (pp.1).

Based on this information, it is understood that the primary stone building was constructed in 1850 and the existing wood plank structure, formerly used as a grain house, was constructed in 1865. The article does not mention the brick addition nor is it portrayed in the illustration with the article which is dated October 12, 1889. Instead, the illustration depicts a gabled roofline that was placed slightly below the gabled roofline of the grain house. Theresea Goldie Falkner, granddaughter of John Goldie, stated in a memoir, "Two storeys of brick were added to the stone mill in the early nineties" in reference to the 19th century; therefore, the second storey addition would have been constructed between 1890 and 1899. Two other mills were acquired as the business expanded in Galt and Highgate. The method changed completely from stones to full Hungarian process (Falkner).

Historical photographs shown in 1902 and possibly the early 20th century, show the mill at its fullest; this included a two-storey brick addition and upper structure above and the rear structure, consisting of the grain house which remains apparent with its historic form. There are additional buildings including the former mill office, and multiple outbuildings as well as the railway line within the view looking towards the eastern elevation of the mill. These early photographs demonstrate that the property was not heavily treed. There is a clear view of a grassed slope down to the property from Greenfield Road and a rather clear view towards the Nith River to the right of the photograph dated in 1902.

In 1910, what was then known as the Goldie Four Mill was bought by the Canada Cereal Milling Company, although the manager of the firm for several years was Mr. John Goldie Jr., grandson of John Goldie Sr. (Tweedsmuir). In a 1916 topographic map, the railway line is shown entering from the east. The brick mill office is shown to the north of the mill. The Site is labelled "G.M" although at this point the Goldie Flour Mill had been purchased. The mill race is present as well as the dam from the mill operations.

In 1922, the mill was purchased by the Hecker-H-O Company which produced a breakfast food "Force". At the time, some alterations were made to the mill by the changing of some of the machinery. In 1929 and 1938 historic topographic maps, the features present in the 1916 topographic map remain. The site continues to be labelled "G.M". The Hecker-H-O Company did well until 1940 during World War II when they encountered troubles in shipping the food as their major market was overseas and subsequently, the cereal was discontinued (Tweedsmuir). In 1945, the company was purchased by The Best Foods (Canada) Limited and they produced margarine and mayonnaise which merged in 1959 with the Canada Starch Company (Tweedsmuir, recorded by E.D Watson and Murdo Lillico).



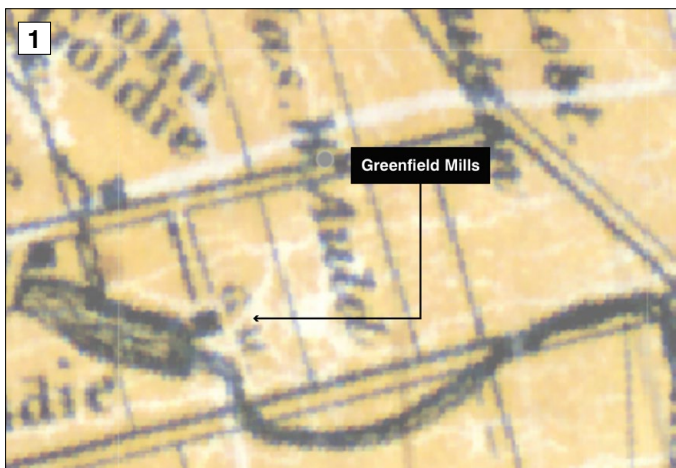
In a 1954 aerial photograph, the mill is present, although there is a dense wooded area located to the north of the mill. The mill race is still present with some plantings, the remainder of the land surrounding the mill is open, cleared green space towards the Nith River. It does appear that the arched driveway into the site, shown originally in the 1881 historical mapping, is still present.

The property was purchased in 1982 by 415665 Ontario Limited (Jad Vent). A comparative review between the 1954, and 2006 aerial photographs indicate that since 1954 there were several changes to the site and its immediate surroundings including: removal of the eastern entrance to the Site which was the original historic entrance according to the 1861 Tremaine Map, the significant increase in vegetation/plantings along the Nith River and south of the mill, the deterioration of the historic dam.

The property was sold in 2016 to Collingwood Cambridge Holdings Inc. The mill office and pumping station was removed in the 2017-2018 following this purchase and the original intent by the owner was to adaptive re-use the property as a residential condominium. An aerial photograph of 2024 shows the absence of the mill office and significant increase in forestation within and surrounding the Subject Site. In 2025, the property was purchased by the current owner, Greenfield Mill Inc., to adaptively reuse the mill complex for a wedding venue.

The site historically has been part of the Greenfield community and used for industrial uses which differs from the agricultural nature of nearby lands. The Greenfield Mill played a central role in the development of the Greenfield community including the provision of the notable salt box worker's cottages which line Greenfield Road and supported employees of the mill. Today, the mill remains vacant.

Figure 12. **19th Century History Cartography**

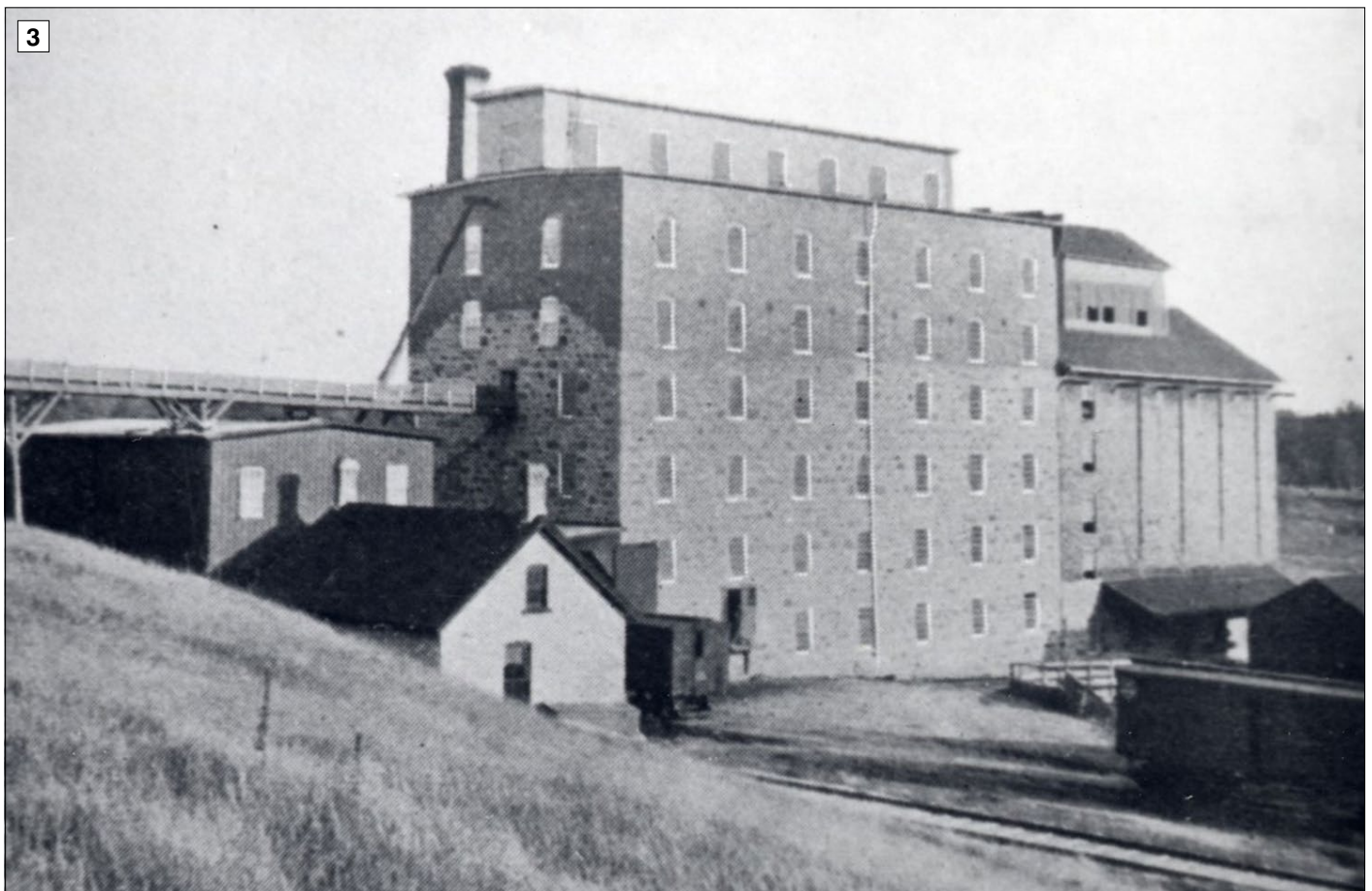
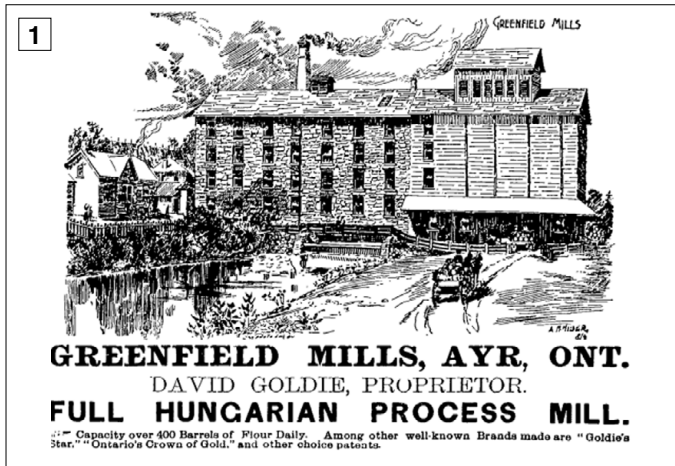


1. Excerpt of the 1861 Tremaine Map of the County of Waterloo (Ontario Historical County Map Project);



2. Excerpt of the Illustrated Historical Atlas of Waterloo County, 1881 (Courtesy of McGill University).

Figure 13. **Historical Illustration and Photographs of the Greenfield Mill**



1. Illustration of the Greenfield Mill published in an 1889 news article The Saturday Globe.
2. Undated historical Photograph of the Greenfield Mill looking at the east elevation along mill race, possible early 20th century (Source: Ayr News, Undated from article "Scenes of Olden Days".)
3. Historical Photograph of Greenfield Mill in 1902 (Courtesy of the Kitchener Public Library, PB1)



Figure 14. **Historical Topographic Maps**

Historical Topographic Map Digitization Project

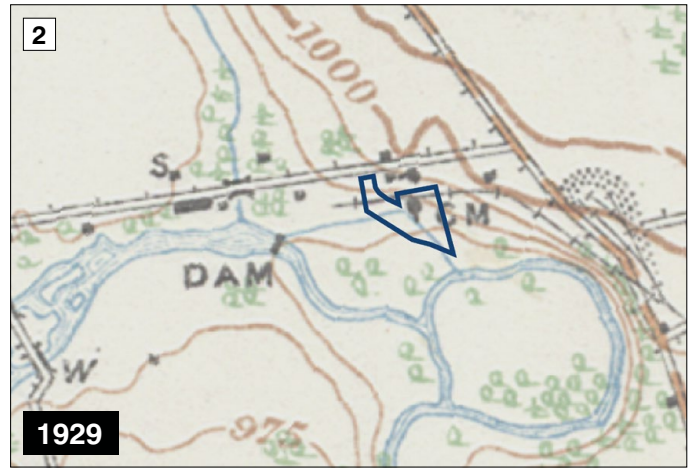
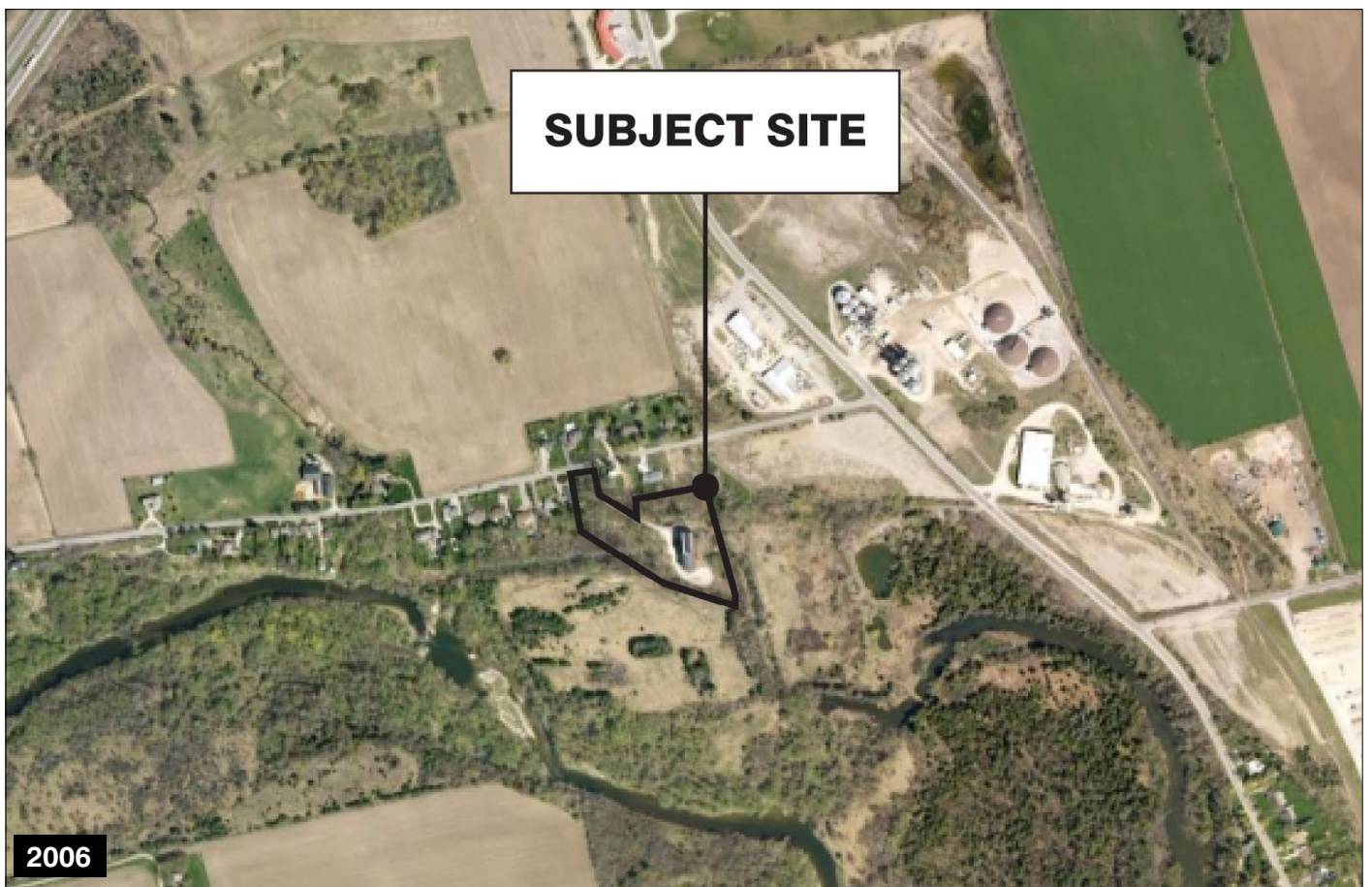


Figure 15. **Aerial Photographs**

University of Toronto Map and Data Library and Google Earth





6. EXISTING CONDITIONS

6.1 Subject Site



6.1 Subject Site

A site visit was completed by TBG Staff on March 12, 2026, to review and document the existing conditions of the building on the Subject Site. The Site itself contains the building complex and supportive infrastructure (e.g. chimney stack, the remnants of the mill race/ raceway, remnants of the railway line), western driveway and organic vegetation. Although not located within the Subject Site, there are supportive features located within the surrounding context including the remnants of the full raceway leading to and from the Nith River (See **Figure 16**), the remnants of the dam structure and former mill pond.

The building complex is composed of two sections: 1) Six storey building with interior timber structure and exterior mass masonry and brick walls and (Building Part 1 in Figure 17); 2) Four-storey constructed with an interior timber structure and exterior horizontally laid timber plank walls (known as nail-lam timber) (Building Part 2 in Figure 17).

The following review by TBG is not intended to be a comprehensive or professional assessment of condition, but rather to review the built and landscape features from a heritage conservation perspective. Sub-section 6.1.3 will provide a high-level review of the condition of the building complex through the completed Condition Brief (April 2026) by Tacoma Engineers who are heritage engineers (see **Appendix 'C'**). Please note, existing conditions of the building were documented through 3D scanning by Matterport 3D scan (March 2026).

Figure 16. **Current Conditions of Remaining Mill Infrastructure**

TBG, 2026



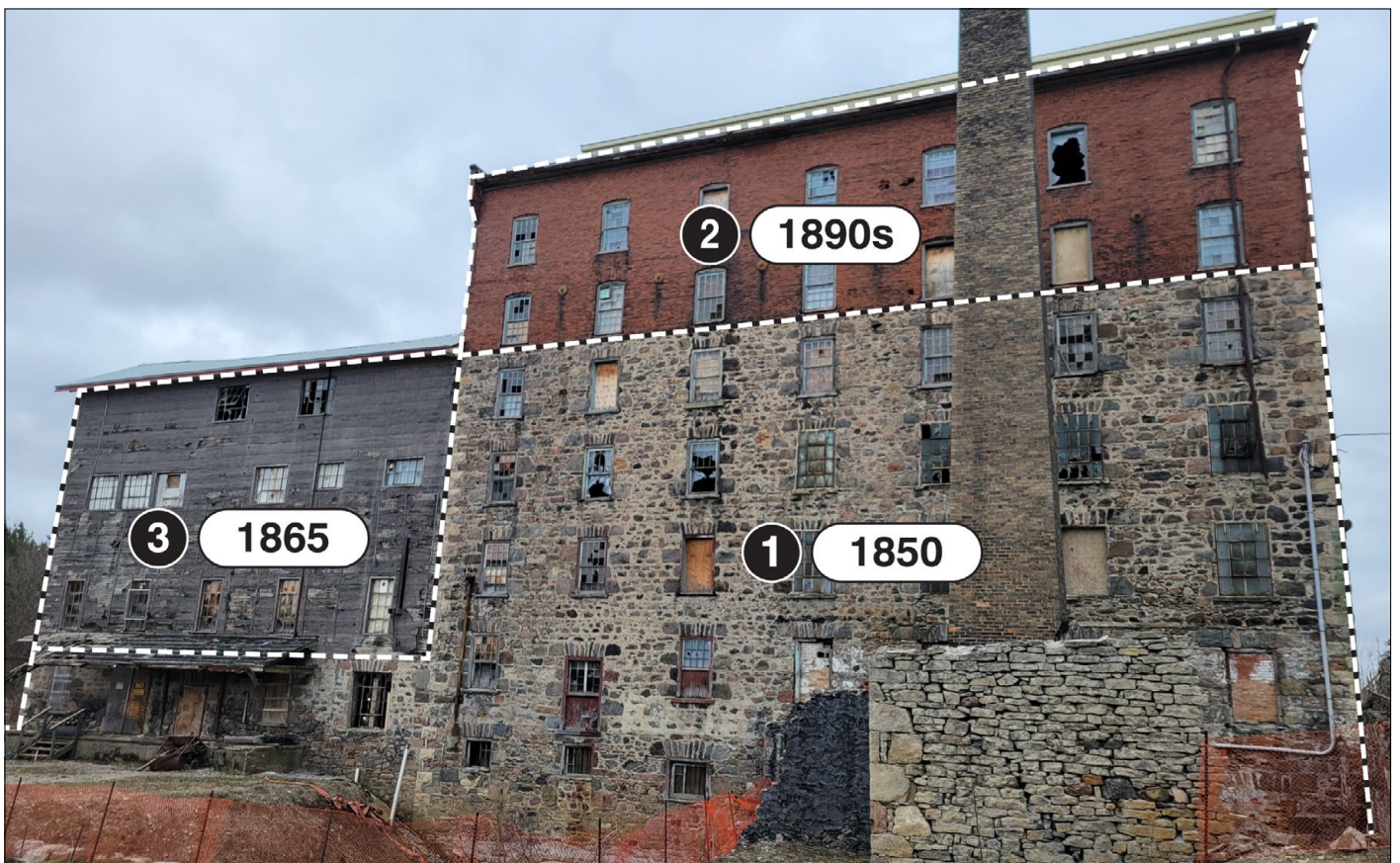
Figure 17. **Building Morphology & Cross Section**

TBG, 2026



Figure 18. **Building Morphology**

TBG, 2026





6.1.1 Built Features

The building includes a rubble stone foundation which includes the allowance of the mill race in a portion below which formally operated the historic mill. Although boarded, the two archways to facilitate the flow of water for the production of power to operate the mill are still present on the east elevation. Most of the original window frames, which are generally 12 over 12, double hung windows, are present throughout the complex, however, are significantly deteriorated.

The Former Mill Complex

North Elevation

The north elevation consists of the four-storey stone mill structure and a two-storey brick masonry upper addition with platform roofline. The remnants of gabled roofline line can be seen integrated into the red brick above which partially interjects with two window openings. The first two levels include a loading area to the left with a set of concrete steps. Three openings are filled with concrete blocks, one is boarded and the remaining window is exposed. This portion is covered in a greenish substance. Portions particularly along the first level appear to be missing mortar. The upper storeys include two filled openings, both appear to originally be window opening (one was extended) a boarded door opening (appears to be have been an altered window opening) and boarded window. The remaining windows are exposed. Most of the openings include segmental arches (See Figure 19).

East Elevation

The east elevation includes the four-storey stone elevation and two storey brick upper addition. It appears that the original window openings have been retained.

There are a few windows to the east of the elevation that have been filled in with brick masonry whereas some of the upper windows have been boarded or include the original frames or replacements (4 over 4 window frames). The window frames that are present appear to be in a deteriorated state. The window openings along the stone mill include timber sills and stone window headers. The window openings along the brick upper storeys include segmental arches with three rows of header bond brick coursing. On the west side of the upper storey of the brick addition, there is a corbelled brick end. There is significantly darkened of brick on this elevation in areas of the sills and tie rods anchors/ wall ties which indicate poor drainage. There is some discolouration around the basement level of the building in the area of the mill race arches where three window openings were adjusted to be half their length. The stone arches include what appears to be efflorescence. There is stone quoining along the corners of the stone mill. There is a section to the south of the chimney shaft where it appears there is a significant crack; this area has been filled in with some brick masonry and a layer of tar applied to a section of the wall.

The first level of the rear wing is integrated into the original stone mill and includes rubble stone. It appears that a significant amount of the original mortar has deteriorated. This first level includes five openings which have stone headers. A wooden overhang in poor condition partially covers four of the openings along this level. A poured concrete platform is currently present for access into the building through this entrance; these openings are boarded. The remaining window opening includes a replacement frame. The upper levels are composed of the plank/nail-lam timber structure. There is an exterior asphalt cladding which has significantly deteriorated exposing the wood structure to the elements. Some of the original windows remain, however, the windows are significantly damaged (See Figure 20).

South Elevation

The south elevation includes the southern façade of the plank/ nail-lam timber structure formerly used as the grainhouse for the historic mill. The first level includes two window openings; the opening to the right appears to have had alterations to the header for an upper opening. The first level consists of a rubble stone which appears to be missing mortar. This section includes stone quoining and exposes the ends of the timber beams supporting the upper wood structure. The openings along this façade are sporadic in nature with some window openings including later replacement windows while the two upper windows under the roofline appear to be original wood frames. The windows appear to be in an advanced stage of deterioration. The majority of the façade is concealed in an asphalt cladding, however, there are exposed areas of the wood structure that appear to be darkened/ rotted due to exposure to the elements. The unique roofline of this portion of the building can be viewed from the elevation which would have supported the former grain elevator (See Figure 21).

West Elevation

The west elevation includes the rear wing; the first level of this wing consists of rubble stone with five openings with stone headers with boarded openings. The upper level includes the plank/ nail-lam timber structure which is primarily concealed by an asphalt cladding; there are a few portions that have been exposed to the elements and appear to be darkened inferring significant deterioration. Windows along the façade of this addition are sporadic in proportion and sequencing and include later replacement windows. The window frames appear to be in poor condition.

This elevation also includes the historic four storey mill section which generally includes symmetrically placed and sequenced window openings with timber sills and stone headers. Some of the window openings have been boarded while some of the original window frames appear present but in a deteriorated state.

There is a loading area along the first level to the left of the façade as well as a human door entry into the building which leads to a stairwell. There is a wooden canopy with remnants of an asphalt roof along this section of the building. The upper two brick levels include symmetrically placed window openings with segmental arches composed of three rows of header brick coursing. Between the levels are tie rod anchors/ masonry wall ties which appear to have caused some discolouration along the faced. There is a brick corbel along the south-west corner of the brick addition.

There are some localized areas where it appears that the mortar has significantly deteriorated along the stone portion of this façade. There is an egress stairwell from the top storey to the fourth storey with a landing at two openings. There is darkening particularly below this stairwell along the stone façade which possibly indicates negative impacts from this feature on the masonry (See Figure 22).

Interior (underline)

Figure 24 provides a selection of images of the interior of the building showing the general conditions of each section. The interior of the building, however, is not under the protection of the Part V designation under the OHA. The intent is to provide a general understanding of the interior of the building as it pertains to the exterior building envelope.



Figure 19. **North Elevation**

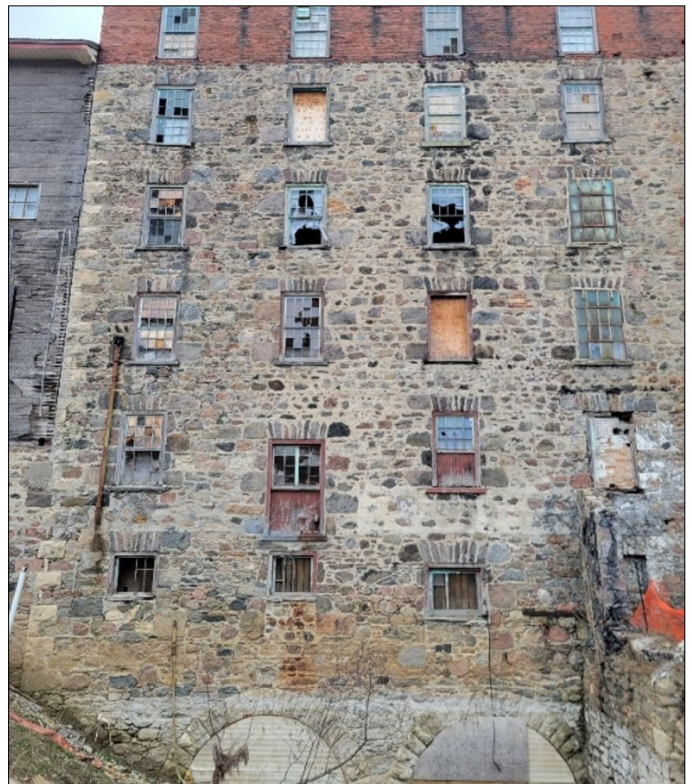
TBG, 2026



Views of the north elevation of the building showing the four storey historic stone mill (1850) and upper brick addition (1890s). (TBG, 2026).

Figure 20. **East Elevation (Plank/Nail-lam Section)**

TBG, 2026



Views showing plank/ nail-lam timber structure which constitutes the rear wing as well as detailed images of the level of deterioration on this façade.



Figure 21. **East Elevation (Plank/Nail-lam Section)**

TBG, 2026



Views showing plank/ nail-lam timber structure which constitutes the rear wing as well as detailed images of the level of deterioration on this façade.

Figure 22. **South Elevation**

TBG, 2026



Views of the south elevation which includes the plank/ nail-lam timber structure which constitutes the rear wing.



Figure 23. **West Elevation**

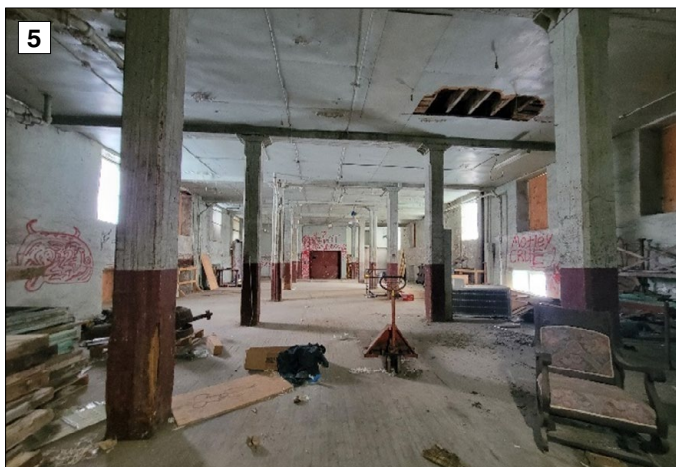
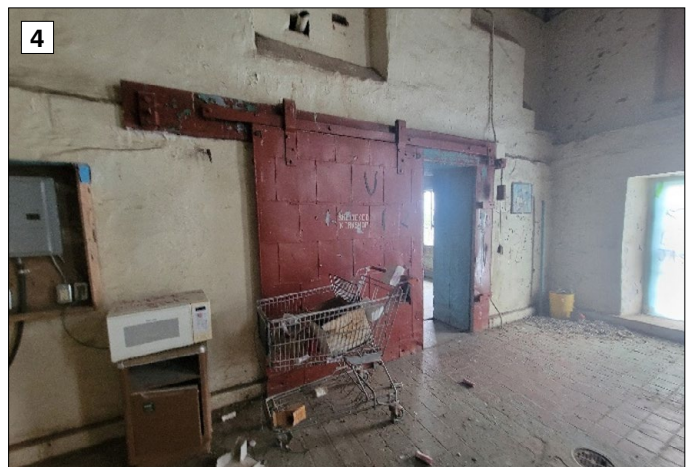
TBG, 2026



Views of the west elevation of the mill complex which shows the three main portions of the building including the original stone mill (1850), the plank/ nail-lam timber wing (1865) and the brick addition (1890s).

Figure 24. Selection of Interior Photographs

TBG, 2026



1. View of interior of the rear wing plank/ nail-lam timber structure looking towards south façade;
2. View of interior of the original stone mill portion of the building;
3. View of the interior location of the transition between the original stone mill and brick addition with corbelled detail looking towards north elevation
4. View of industrial sliding door in the original stone building leading to rear wing;
5. View of interior upper level (4th) of stone mill
6. View of ground/ basement floor showing the area where water would have formerly entered the building from the mill race to generate energy to power the historic mill



Mill Infrastructure

The property includes remnants of the mill infrastructure and supporting features. These features include: the chimney stack, retaining walls relative to the chimney area and supporting the mill race, remaining railway line.

The chimney stack is observed to be constructed of what appears to be a buff brick which tapers at the end. There is significant discoloration along the chimney shaft indicating deterioration. The brick chimney shaft is positioned on a stone platform which is supported by a rubble stone base. This base appears to have been altered over time including the addition of some brick masonry and later applications to the masonry. The masonry is missing significant mortar and appears to be in poor condition. The surrounding/nearby stone walls also are in poor condition showing a greater state of deterioration where masonry has collapsed in areas. There are portions of the wall, particularly along both the eastern and southern side surrounding the chimney, which appear to be a different form of masonry construction. Although the foundation appears to be a mix of fieldstone, the upper level is similar to dry stone walling which is a tradition of both Scottish and Irish masons where thin stones are used to create a wall. In the case of true dry-stone walling, no mortar is used. Large fieldstones have been incorporated as quoins. As the top later of the walls have no protection, exposure to the elements, particularly water appears to have impacted the integrity of these walls. This same construction technique has been used for a retaining wall north of the mill race arches that would have supported the mill race.

There are remaining railway lines located immediately in front of the north elevation where there was a former railway line which was a branch off the Canadian Pacific Railway which ran just north of the Village of Ayr.

Figure 25. **Mill Infrastructure**

TBG, 2026



1. General view of mill infrastructure;
2. View of chimney shaft and retaining wall;
3. View of chimney shaft and retaining wall with existing opening;

4. View of retaining walls enclosing the chimney shaft and opening from stone building;
5. View of the remaining railway line;
6. General context view of remaining railway line and mill infrastructure.



6.1.2 Landscape Features

The north and east side of the site include a small portion of deciduous trees which includes Poplar, Black Cherry and Hackberry. The Site also includes remnants of mill infrastructure and railway ties from former rail line. To the south is a mix of coniferous trees and regenerating deciduous trees and cultural meadows.

The site includes a sloping hill which leads to the mill complex and the Nith River floodplain which was a physical and functional linkage for the operation of the mill in the past. This topographical and physiographic feature is part of the over character of the Subject Site. The remainder of the property is a gravelled area for parking, loading and storage.

Figure 26. **Landscape Features**

TBG, 2026



1. View of the open green space immediately surrounding the mill complex;
2. View of the gravelled parking/ storage area along the western side of the site;
3. View of the remnants of the mill race along the eastern side of the site;
4. View of the remnants of the mill race from the west side of the side.

6.1.3 Condition Brief (April 2026)

A Structural Memo Condition Assessment has been completed by Tacoma Engineers dated April 23, 2026 (see **Appendix 'D'**). The purpose of the assessment was to provide a baseline against which future conditions can be measured and to provide guidance for the future redevelopment of the subject site. The report separates the two sections of the building complex: The building complex is composed of two sections: 1) Six storey building with interior timber structure and exterior mass masonry and brick walls and; 2) Four-storey constructed with an interior timber structure and exterior horizontally laid timber plank walls (known as nail-lam timber). The building complex includes several interior structures which provide support for the interior stairwells and elevator.

In summary, the following conclusions were made (see Appendix 'C' for full assessment):

- The interior wood framing is in fair condition with some isolated areas with damage due to long term water ingress. Reinforcing did not address poor condition or overloading on the floor framing.
- Exterior mass masonry walls are in poor condition. No structurally concerning areas but restoration work should be completed. Interior masonry was largely concealed; some of the heavy timber lintels for window openings are deteriorated and require replacement.
- The nail-lam exterior walls (rear wing) were in poor condition due to long term exposure to the elements. The existing asphaltic based exterior is in an advanced state of deterioration. There is evidence of a roof leak in the south-east corner (roof has recently been replaced to control leaking). The corner of the building “was found to be in very poor condition, with significant bowing” (pp.3).

- The ruins were found to be in poor condition as water has entered the cavity of the walls and will require reconstruction. The chimney is in poor condition and restoration will be required.

In conclusion, the assessment stated that the building is in poor condition and that restoration should be carried out as part of the redevelopment. It states that there would be significant reconstruction of the rear nail-lam wing which “may make restoration of this area unpractical from a project budget prospective” (pp. 5).

6.1.4 Heritage Integrity

The Ontario Heritage Toolkit discusses the importance of heritage integrity as part of the rigorous review of a property within the context of a heritage designation. The following provides an excerpt of this discussion:

Cultural heritage value or interest may also be intertwined with location or an association with another structure or environment. If these have been removed, the integrity of the property may be seriously diminished. As well, cultural heritage value or interest can be found in the evolution of a heritage property, as much can be learned about social, economic, technological, and other trends over time. The challenge again, is being able to differentiate between alterations that are part of an historic evolution, and those that are expedient and offer no informational value.

This sub-section reviews the extant building on-site, available historical visuals to assess its heritage integrity. A historical illustration from 1889 (cognisant that this is an artistic depiction) and a photograph from 1902 are used to provide a comparative analysis to understand and gauge the level of heritage integrity of the existing building.



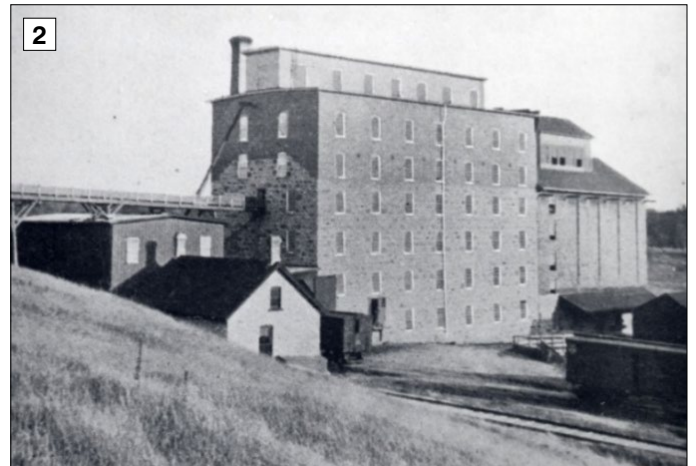
As with many historic properties, the mill complex evolved over time to suit the needs of the companies that operated within. There were three main phases of the building 1) the original stone mill constructed in 1850; 2) the nail-lam/ plank rear wing (former grain house) constructed in 1865 and 3) the two storey brick masonry addition above the stone building between 1890 and 1899 based on imagery and information written by John Goldie's granddaughter, Theresa Falkner.

These changes to the building should be considered part of the historic evolution of the building that do offer informational value on the changes in industry and types of industries formerly operating within the complex. However, changes over time, have altered some aspects of the design of the building complex including:

- The removal of the original gabled roofline of the stone mill with the addition of two upper brick levels with a platform roofline and additional mechanical structure above;
- Removal of the grain elevator from the grain house and alteration of the roof the roof.
- Canopy/ overhang along the first level of the grain house (west elevation) was removed.
- Some infilling of openings on the front (north) elevation and alterations to facilitate later operations (i.e. changes to openings to facilitate a chute/ shaft for the transfer of goods).

It is important to note that from a perspective of the overall site, supporting outbuildings, including the mill office, were removed as well as a pumping station. However, there are still remnants of supporting historic mill features including the mill race and dam.

Figure 27. **Heritage Integrity Comparative Analysis**



1. Illustration of the Greenfield Mill in 1889;
2. Photograph of the Greenfield Mill in 1902;
3. TBG Photograph from March 2026.



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7. HERITAGE IMPACT ASSESSMENT

7.1 Introduction

7.2 Compatibility with Greenfield Heritage Conservation District Plan

7.3 Impact Analysis

7.4 Summary



7.1 Introduction

This section aims to evaluate the potential impacts of the proposed development on the Greenfield Village Conservation District, based on the GHCD Plan policies and guidelines, and to the individual resource with the understanding that the protection of the property is under Part V of the OHA.

It should be noted that the policies and guidelines of the GHCD Plan are predicated on the provincial and federal conservation standards which are mentioned in the Township's Terms of Reference. This includes the Eight Guiding Principles in Conservation of Built Heritage Properties, Standards and Guidelines for the Conservation of Historic Places in Canada. Guidelines such as the Region of Waterloo- Practical Conservation Guidelines for Heritage Properties are inherent in the GHCD Plan.

7.2 Compatibility with Greenfield Heritage Conservation District Plan

7.2.1 HCD Plan Policies

The Greenfield Heritage Conservation District Plan (2014) outlines the policies and guidelines to protect the District. Section 8.0 of the Plan outlines the following relevant policies: general policies, Greenfield Road Policies, Trees and Vegetation on Private Property Policies, Woodland Policies, View Policies, Contributing Resource Policies, Demolition of Contributing Resources Policies and New Development Policies. The overarching general policies within sub-section 7.1.1. of the Greenfield HCD Plan are as follows:

- a) *Greenfield Heritage Conservation District shall be conserved; and,*
- b) *Contributing resources located within Greenfield Heritage Conservation District shall be conserved.*

The following Tables 1-4 review the policies in the HCD Plan as applicable to the Subject Site. The following Table 1 review the policies relevant to roads, nature and views.

Table 1. **HCD Plan Policies- Roads Nature and Views**

HCD Policies- Roads, Nature and Views	
Policy	Response
Greenfield Road Policies (Section 8.2.1)	
a) Greenfield Road shall be identified in policies and schedules of the Township of North Dumfries' Official Plan as a Scenic Road;	Noted. Obligation of the municipality.
b) Greenfield Road shall be conserved;	The proposed development will not alter Greenfield Road, however, a new driveway is proposed to the east of the existing property which will require integration with the Greenfield right-of-way. This "new" laneway is within the location of what was the original historic entrance to the mill.
c) Public works within Greenfield Heritage Conservation District meeting the definition of "maintenance," as defined by the Greenfield Heritage Conservation District Plan, shall be permitted to proceed without Heritage Permit approvals;	Noted. Relevant to the municipality.
d) Public works within Greenfield Heritage Conservation District exceeding the definition of "maintenance," as defined by the Greenfield Heritage Conservation District Plan, shall require Heritage Permit approvals prior to proceeding. A Cultural Heritage Impact Assessment may be required for works exceeding the definition of "maintenance," as defined by the Greenfield Heritage Conservation District Plan; and,	Noted. Obligation of the municipality.
e) Any changes to Greenfield Road as a result of changes to Provincial engineering standards that are required to be implemented for health and safety reasons will be undertaken in such a manner to permit the conservation of heritage attributes of contributing resources while still ensuring the health and safety of the public.	Noted. Obligation of the municipality.



Trees and Vegetation on Private Property (Section 8.3.2)	
<p>The Township considers a heritage tree designation at the request or nomination by the community and that the Townships staff, in conjunction with the North Dumfries Municipal Heritage Committee considers listing</p> <p>the tree(s) within the Greenfield Heritage Conservation District on the Inventory of Heritage Resources and that the North Dumfries Municipal Heritage Committee determine what level of protection could be provided for trees selected for heritage protection and which legislative tools are relevant for protective measures.</p>	<p>Noted. Obligation of the municipality. There are no designated heritage trees on the property.</p>
<p>An approved Tree Preservation Plan completed by a Certified Arborist or Registered Professional Forester shall accompany all Site Plan Applications and/or Cultural Heritage Impact Assessments where construction activities on private property may impact trees found on private property.</p>	<p>A Tree Preservation Plan (“TPP”) is proposed to be completed by Arcadis Professional Services (Canada) Inc. (“Arcadis”) as part of a Site Plan Application submission. This CHIA reviews the impact of the removal of tree plantings and provides recommendations in Section 9.0 of this report. Specific recommendations should be implemented as recommended in the completed TPP as submitted with the SPA application.</p>
Woodland Policies (Section 8.3.3)	
<p>a) Where the injury, destruction, and/or removal of trees from a woodland is desired within Greenfield Heritage Conservation District, the applicant must demonstrate that, in addition to the requirements of the by-law, the injury, destruction, and/or removal is consistent with the Greenfield Heritage Conservation District Plan and Guidelines.</p>	<p>According to the Scoped Environmental Impact Study (“EIS”) (2026), some woodland areas occur within the Site. Due to a tornado on August 17, 2024 most of the mature trees on the site’s west and northwest side (see Figure 28 - Significant Woodlands). The proposal will include the clearing of some trees and regrading of the site and in particular potentially clearing trees along the eastern right of way to instal a new driveway.</p>

View Policies (Section 8.4.1)	
<p>a) Significant views, as identified within the Greenfield Heritage Conservation District Plan, shall be conserved; and,</p>	<p>There is a significant closed/ short view identified in sub-section 8.4.1. of the Plan commencing approximately from 3066-3067 Greenfield Road looking westwards along Greenfield Road towards 3089 Greenfield Road. There is no specific information relevant to the particular view and why it is significant, however, Figure 29 demonstrates that the view is along the roadway. The proposed development results in the reduction of height of the existing building so it would reduce the appearance of building mass along the road.</p>
<p>b) Works on adjacent properties shall not negatively impact identified views and viewsheds.</p>	<p>The Subject Site is within the HCD and considered a Contributing Property within the District.</p>
<p>Where proposed development or site alteration, within or adjacent to the Greenfield Heritage Conservation District, has the potential to impact a significant view, the completion of a Cultural Heritage Impact Assessment may be required.</p>	<p>This CHIA serves as the impact assessment for the proposed development and potential impacts on views which is also reviewed in sub-section 8.3.5 of this report.</p>



Figure 28. **Significant Woodlands and Area of Impact**

Greenfield Heritage Conservation District Plan

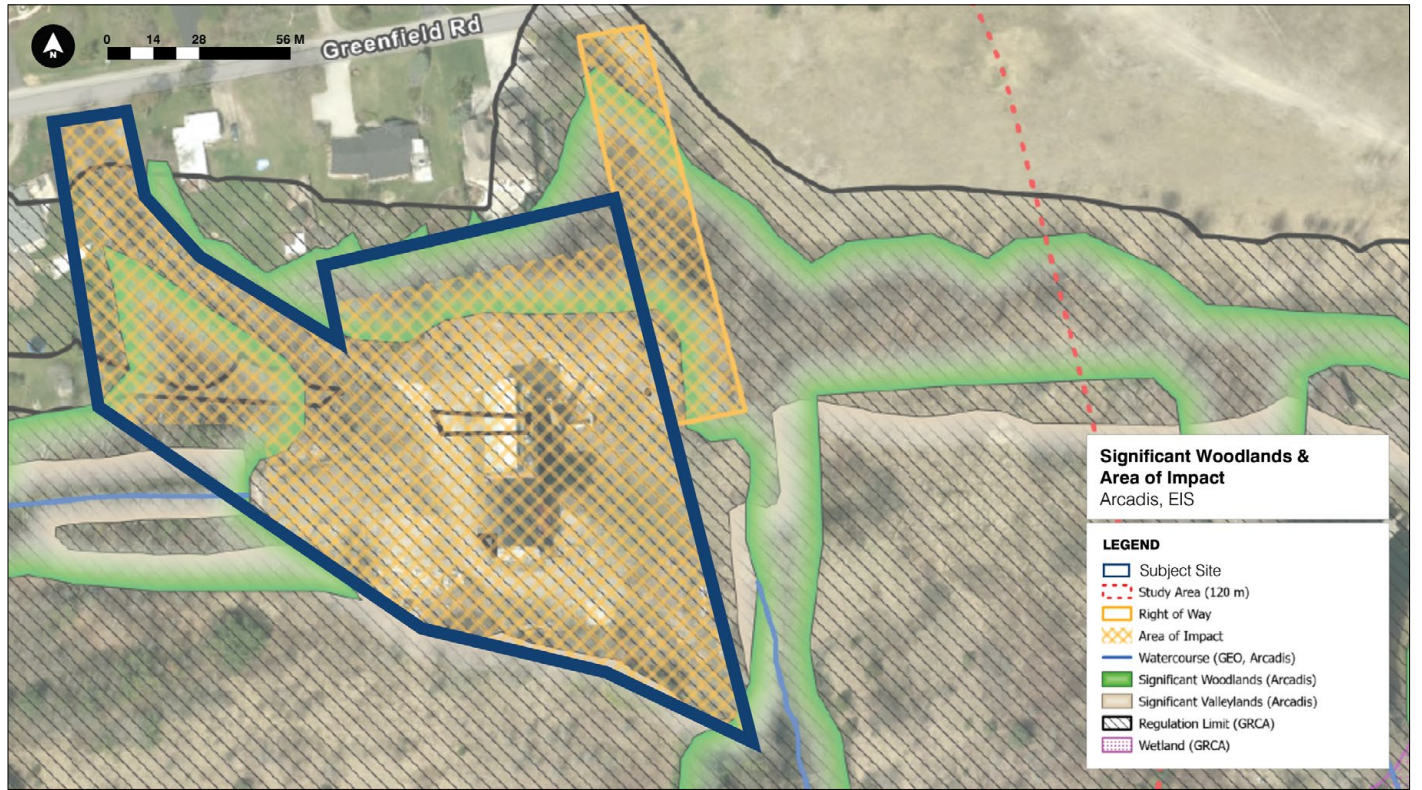


Figure 29. **Significant Views and Vistas**

Greenfield Heritage Conservation District Plan



Table 2. **HCD Plan Policies- Contributing Resources**

HCD Policies- Contributing Resources (Section 8.5.1)	
Policy	Response
a) Contributing resources shall be conserved;	Noted.
b) Works meeting the definition of “maintenance,” as defined by the Greenfield Heritage Conservation District Plan, shall not require municipal approvals;	Noted.
b) Classes of alterations for contributing resources requiring or not requiring a Heritage Permit shall be identified in Section 9.0 of the Greenfield Heritage Conservation District Plan;	Section 9.0 of the GHCD identifies the classes of alterations for contributing properties. Based on the proposal described in Section 4.0 of this report, the proposed development would be considered requiring a heritage permit for: window replacements, door replacements, changes to window and door openings, alteration to roofline and re-roofing, new or increased parking areas, addition or alteration that may impact the identified heritage attributes of the contributing resources. A heritage permit would also be required for proposed major interventions including erection of a new building, major alteration visible from the street/ or may impact heritage attributes of the contributing resource and partial demolition wood plank structure (Building Part 2).
c) In support of a Heritage Permit, the preparation of a Cultural Heritage Impact Assessment may be required for alterations or interventions with the potential to impact a contributing resource, an adjacent contributing resource, and/or a heritage attribute of Greenfield Heritage Conservation District;	This CHIA constitutes the meeting of this policy as it relates to the proposed alterations and contributing status of the property.
d) Alterations that have the potential to adversely impact heritage attributes of a contributing resource or those of an adjacent contributing resource shall not be permitted barring exceptional circumstances;	This CHIA assesses the level of impact that the proposal has upon heritage attributes of the contributing resource. The proposal is intended to provide a long-term, viable adaptive re-use of the property which has been vacant for over a decade.



<p>e) Additions or alterations to contributing resources should be sympathetic, subordinate, distinguishable, and contextual in relation to the existing resource and its context, as well as the heritage attributes of Greenfield Heritage Conservation District;</p>	<p>A new addition is proposed to replace the existing structure facilitating the former grain house of the mill. Due to the poor condition, it is proposed to be replaced with a new building constructed upon the old, stone foundation. The intention is that it will be designed in a way that pays homage the former structure while being subordinate and distinguishable.</p> <p>Alterations, including the removal of the two-storey brick addition, will be part of the restoration of the original stone mill. An addition composed of glazing will be addition to the top of the building to avoid the appearance of massing and allude to a subordinate and distinguishable form.</p> <p>Other alterations, such as the changes to entrances, window and door openings are to create consistent, symmetrical openings in the restored mill and provide accessible entrances to be consistent with the Ontario Building Code.</p>
<p>f) The administration of the Ontarians with Disabilities Act, the Ontario Building Code and related codes and regulations will be undertaken in such a manner to permit the conservation of heritage attributes of contributing resources while still ensuring the health and safety of the public. Preference should be given to reversible interventions;</p>	<p>A new elevator is proposed in the new addition to avoid impacting the historic building. There will be an entrance located on the north elevation which will extend an existing loading door with an at grade entrance. This change requires the removal of some stone masonry to facilitate this new opening/ access to the building which can be accessible at grade.</p>
<p>g) The conversion of contributing resources from a defined use within a zoning by-law to a different use may be permitted provided that the proposed change does not adversely impact the cultural heritage value of the contributing resource or the heritage attributes of Greenfield Heritage Conservation District and other applicable municipal requirements are met. The preparation of a Cultural Heritage Impact Assessment may be required;</p>	<p>The proposed requires the submission of a Zoning By-law Amendment application for the removal of Prime Agricultural lands for the proposed uses which includes the use of the property as a wedding venue. The extension of uses supports the adaptive reuse of the structure which allows for long-term viability of the building. Currently, the property is vacant and has limited uses. This CHIA has been prepared to address the impacts and severity (see Section 8.3).</p>

<p>h) Interventions or alterations for energy efficiency (e.g. solar panels, windows) should be encouraged but shall not compromise, diminish, or negatively impact contributing resources or the heritage attributes of Greenfield Heritage Conservation District; and,</p>	<p>The existing windows will be replaced with new, high-efficiency windows. This does require the removal of the existing window frames which range in condition.</p>
<p>i) Guidelines established within Section 11.0 of the Greenfield Heritage Conservation District Plan should be followed for proposed development or site alteration, including addition or major renovation, to contributing resources. These Guidelines should be used in the review and evaluation of Heritage Permit applications and Cultural Heritage Impact Assessments.</p>	<p>Sub-section 8.2.2 of this report reviews the guidelines provided within Section 11 of the GHCD within the context of the proposal.</p>

The proposal includes the proposed demolition of the southern wing of the existing industrial complex which includes the former grain house of the mill which is a wood structure, however, the original stone mill and stone foundation of this wing will be retained. As this is a proposed demolition, albeit partial, the following Table 3 reviews the policies relative to demolition.



Table 3. **HCD Plan Policies for Demolition of Contributing Resources**

HCD Policies- Demolition of Contributing Resources (Section 8.6)	
Policy	Response
a) The North Dumfries Municipal Heritage Committee shall review all Demolition Applications for protected heritage resources located within Greenfield Heritage Conservation District. Comments of the North Dumfries Municipal Heritage Committee shall be forwarded to Council for their decision;	Noted.
b) The demolition or relocation of a contributing resource located within Greenfield Heritage Conservation District is strongly discouraged. The demolition or relocation of a contributing resource may only be permitted in exceptional circumstances;	Demolition is limited to the wood structure constituting the rear wing and two storey brick masonry addition to the primary stone building. The condition of the rear wing is poor to fair and therefore, the proposal is to remove the structure and replace it with a new addition while incorporating portions of the former structure into the new building as feature walls, etc.
c) Any proposal for a permit under the Ontario Building Code that includes the complete removal of a building or structure located upon real property identified as a protected heritage resource is considered as demolition or removal under Section 27(3) of the Ontario Heritage Act and that such applications are required to adhere to the requirements of Section 27 (3), Section 27 (4), and Section 27 (5) of the Ontario Heritage Act (which governs the demolition and removal of a building or structure);	The proposal includes a partial demolition, however, and will require a demolition permit under the Ontario Building Code.

<p>d) Any proposal for a permit under the Ontario Building Code that includes the removal of a structural element (such as a wall) of a building or structure located upon real property identified as having cultural heritage value or interest by the municipality under Section 27 (1.2) of the Ontario Heritage Act ('listed' property), and that this removal will result in the structure or building being unable to stand without support, is considered as demolition or removal under Section 27(3) of the Ontario Heritage Act and that such applications are required to adhere to the requirements of Section 27 (3), Section 27 (4), and Section 27 (5) of the Ontario Heritage Act (which governs the demolition and removal of a building or structure);</p>	<p>The proposal includes a partial demolition, however, and will require a demolition permit under the Ontario Building Code.</p>
<p>e) Documentation of a contributing resource must be completed prior to demolition to create a record of the resource and its components;</p>	<p>The Project Architect, Martin Simmons Sweers Architects ("MSS") have completed documentation of the existing building including floor plans and elevations (see Appendix 'B' of this report). There is also a 3D scan of the building as a digital documentation of the structure.</p>
<p>f) Replacement of contributing resource lost due to circumstances, such as severe structural instability, fire, flood or other reasons, shall be consistent with policies and guidelines of the Greenfield Heritage Conservation District Plan;</p>	<p>Noted.</p>
<p>g) The Chief Building Official shall be directed that, prior to the issuance of a Demolition Permit, Site Plan Approval, a Building Permit, and/or a Heritage Permit for a proposed development or site alteration shall be obtained to mitigate against premature demolition and to ensure that the Municipal Heritage Committee and Council have an opportunity to review the development plans prior to removal of a contributing resource; and,</p>	<p>This CHIA is being completed to be submitted with a Zoning By-law Amendment Application as well as to supplement future planning processes including Site Plan Approval and the Heritage Permit Application relevant to the Demolition Permit Application for the removal of the rear wing and two storey masonry addition on the primary stone building and the New Construction of an addition to the south of the existing historic stone building.</p>



<p>h) Property owners/authorized applicants are encouraged to reclaim (salvage) suitable building materials, such as windows, doors, moldings, columns, bricks, for potential reuse in a new building on the property or as replacement components for other contributing resources within Greenfield Heritage Conservation District which require repair and restoration over time.</p>	<p>The property owners intend on reclaiming building materials including original window and door frames, remnants of the rear wing structure (historic grain house), masonry, and reuse where feasible on-site. Suggestions include the reuse of masonry for hardscaping, reuse of stone masonry where needed to proposed alterations to openings in the primary stone structure and storage of surplus for reversibility and the reuse of wood from the removed rear wing and reconstruction of a portion of the wall within the new building addition as an aesthetic feature (i.e. feature wall).</p>
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New development in the GHCD Plan includes future infill, lot severance, redevelopment and reconstruction due to a catastrophic event. The following Table 4 assesses the development proposal within the framework of these policies.

Table 4. **HCD Policies- New Development**

HCD Policies- New Development (Section 8.8.1)	
Policy	Response
a) Proposed development or site alteration that is not sympathetic to contributing resources and the heritage attributes of Greenfield Heritage Conservation District and/or may result in a negative impact shall be not be permitted;	This CHIA is intended to assess the compatibility of the proposal within the context of the development proposal. The proposed approach to the site is a hybrid between restoration and rehabilitation. The original stone mill will be restored, while new additions will be made to facilitate the adaptive reuse of the building complex.
b) Council will endeavour, through its approval process, to discourage proposed development or site alteration that detracts or negatively impacts contributing resources or the heritage attributes of Greenfield Heritage Conservation District;	Noted.
c) The replacement of non-contributing resources and/or structures or dwellings lost due to circumstances such as severe structural instability, fire, flood, or other catastrophic reasons shall be sympathetic, contextual, and respectful to contributing resources and the heritage attributes of Greenfield Heritage Conservation District. The replication of a lost structure or dwelling is not required; however, the replacement structure or dwelling shall conform to the guidelines of the Greenfield Heritage Conservation District Plan;	Noted. The proposal does not include the replacement of a non-contributing resource.
d) Guidelines, as developed in Section 11 of the Greenfield Heritage Conservation District Plan, should be used in the evaluation of Heritage Permits for new development. Proposed development or site alterations are encouraged to be consistent with the Guidelines of the Greenfield Heritage Conservation District Plan; and,	Section 8.2.2 of this CHIA reviews the proposed development within the context of the GHCD Guidelines.
e) When considering change or an alteration to a contributing resource, property owners are encouraged to consult with the Township of North Dumfries early in the design process to understand the objectives of the Greenfield Heritage Conservation District Plan as well as the resources available to them.	The property owners have consulted members of the Township, including on the heritage committee, to gain insight on the design of the proposal. The owners also are proposing an open house/ public meeting on site as part of the planning process.



The GHCD also includes policies relevant to the public realm. Sub-section 8.9.1 (e) states,

e) The existing informal road edges such as grassed verges and open swales shall be maintained; curb treatments shall not be introduced;

The Plan describes Greenfield Road as, “-a narrow, two-lane, paved road, typifies a rural settlement, with no curbs or gutters, modest gravel shoulders and open, shallow drainage swales.” (pp.51). The intent is that new roadways that intersect with Greenfield Road, should not impact the character of the roadway.

7.2.2 HCD Conservation and Design Guidelines

Section 11.0- 13.0 of the GHCD speaks to Conservation and Design Guidelines. The following sub-section provides a review of these guidelines as applicable to a private contributing property. Guidelines applicable only to public property are not reviewed as they are deemed unapplicable.

Table 5. **Guidelines for Trees, Vegetation, Massing, Setback, Vehicle Parking and Driveways**

Guidelines for Trees, Vegetation, Massing, Setback, Vehicle Parking and Driveways	
Guideline	Response
<i>Trees and Vegetation (12.2.1)</i>	
Maintain the health of trees and shrubs through an appropriate pruning and fertilizing schedule;	Noted.
Do not cut down or damage publicly owned street trees that are adjacent to private property. If a publicly owned tree appears to be in poor condition, health, or is severely damaged or requires major pruning, contact the Township;	Noted.
Use care when cutting grass and using power lawn equipment around trees to avoid damage to the trunk and to surface roots;	Noted. A Scoped EIS (Arcadis, 2026) recommends during construction that orange snow fencing or other suitable fencing should be used to delineate construction limits from the adjacent natural areas for protection (pp. 34). Post-construction recommendations are provided including post-construction tree maintenance to be used to repair any damage caused to trees by construction activities. An assessment of preserved trees is recommended to be completed within 12 months of the construction.

<p>Where new street trees have been planted by the Township, it is recommended that the adjacent property owner assists in the monitoring and watering of the tree, particularly in periods of dry weather; and</p>	<p>Noted.</p>
<p>Where possible, select indigenous tree species when planting a new tree. Indigenous species would have been widely available during the early settlement of Greenfield. The Grand River Conservation Authority's Forestry department offers a number of resources (refer to Appendix F) for the selection of native trees appropriate for planting in the Greenfield District.</p>	<p>The Tree Preservation Plan or Landscape Plan have not yet been completed. A Scoped EIS (Arcadis, 2026) states that the removal of trees on the site should be mitigated through the replanting of native tree species on site in the northeast corner of the site. It will be recommended that the new plantings reflect the selection outlined in Appendix F of the GHCD Plan (see Figure 30- Suggested Tree Species GHCD).</p>
<p>Massing and Setback (12.4.1)</p>	
<p>New development/infill construction should be 1-2 storeys in size with a scale comparable to and complementary with adjacent dwellings; and,</p>	<p>The existing building complex is currently six storeys and contrary to the 1-2 storeys low rise residential historic buildings along the streetscape, should be considered differently. The proposed addition will be similar in height to the existing south wing (4 storeys). The removal of the two storey masonry addition to the primary stone building will reduce the height and therein appearance of massing from Greenfield Road, lessening the impact on views and vistas from the road.</p>
<p>The setback for new development/infill construction should be the average of the setbacks located on either side.</p>	<p>The setback of the existing building complex varies from the residential built form along Greenfield Road. The existing setbacks will be maintained to the road (northern setback) and southern setback as the new addition will repurpose the existing stone foundation on-site. There will be a change, however, in the western setback.</p>



Vehicle Parking and Driveways (12.5.1)	
Should infill development occur along Greenfield Road, driveways will be designed with a single-lane access from the road, to minimize the visual impact on the streetscape;	The proposed new access to the site will be to the east of the property; the existing access from the west side of the site will be closed. The proposed driveway is two-lane access from the road and therefore, may have an impact on Greenfield Road. Currently, however, there are infill properties located north-west of the property along Greenfield Road which includes 2-3 car wide driveways (3067 & 3073 Greenfield Road). This “new” laneway is within the location of what was the original historic entrance to the mill.
New paved parking areas for existing development should be kept away from the road; where feasible, parking should be directed to the side or the back of a property, where space allows, ensuring there are no visual or physical impacts to adjacent heritage resources;	Additional parking to facilitate the adaptive reuse of the property will be located to the rear of existing residential properties primarily along the west side of the site. The parking will be screened by vegetation and sloping topography.
Where setbacks are limited, efforts should be made to explore alternative methods of ‘paving’, such as turf geogrids or to minimize the paved area by implementing a ‘two-track’ driveway, if parking beside or behind the house is not feasible, in order to preserve the expanse of the front yard;	Parking will be located away from the Greenfield Road right-of-way, however, a new double lane driveway is proposed to access the site from the east. Recommendations are provided in this report for the use of alternative methods of paving, for the entrance at a minimum to conserve the aesthetic of the road.
Parking should be screened or softened, where feasible, through the use of landscaping; and,	A Landscape Plan has not yet been developed, however, recommendations can be provided for the use of plantings and design that will screen and soften the parking within the site itself to provide an appropriate setting for the contributing resource on-site.
Paving materials can include asphalt, gravel, concrete, or concrete pavers and should be selected from a natural colour palette. Residents are also encouraged to consider permeable paving options to reflect the sustainable character of the community.	Noted.

Figure 30. **Suggested Tree Species for the GHCD**

GHCD Plan- Figure 11 and Appendix F

Suggested Tree Species for Greenfield Heritage Conservation District				
Botanical Name	Common Name	Native Species	Suitable for Street Tree	Historical Association
Deciduous Trees and Shrubs				
<i>Acer saccharinum</i>	Silver Maple	Yes	No	✓
<i>Acer saccharum</i>	Sugar Maple	Yes	Yes	✓
<i>Amelanchier laevis</i>	Allegheny Serviceberry	Yes	No	
<i>Betula alleghaniensis</i>	Yellow Birch	Yes	No	
<i>Celtis occidentalis</i>	Hackberry	Yes	Yes	
<i>Cornus alternifolia</i>	Alternative Leaf Dogwood	Yes	No	
<i>Fagus grandifolia</i>	American Beech	Yes	No	
<i>Gymnocladus dioicus</i>	Kentucky Coffee Tree	Yes	Yes	
<i>Larix laricina</i>	American Larch	Yes	No	
<i>Ostrya virginiana</i>	American Hophornbeam	Yes	No	
<i>Populus deltoids</i>	Eastern Cottonwood	Yes	No	✓
<i>Prunus serotina</i>	Black Cherry	Yes	No	✓
<i>Prunus virginiana</i>	Choke Cherry	Yes	No	
<i>Quercus macrocarpa</i>	Bur Oak	Yes	Yes	
<i>Quercus robur</i>	Red Oak	Yes	Yes	
<i>Syringa vulgaris</i>	Common Lilac	No	Yes	
<i>Tilia americana</i>	American Basswood	Yes	Yes	
Coniferous Trees				
<i>Picea glauca</i>	White Spruce	Yes	No	
<i>Pinus strobus</i>	White Pine	Yes	No	
<i>Thuja occidentalis</i>	Eastern White Cedar	Yes	No	

Section 13 of the GHCD provides guidelines for built cultural heritage conservation and design. These guidelines are specific to the built heritage features within the District.

The following Tables 6 & 7 review the general guidelines for contributing resources, façade guidelines, roofing and exterior cladding guidelines, doors and windows guidelines and utilities and services guidelines and new development/ infill construction guidelines as they apply to the Subject Site.



Table 6. **Built Cultural Heritage Conservation and Design Guidelines**

Conservation of Contributing Resources (Section 13.1)	
Guideline	Response
General Guidelines (Section 13.1.1)	
Confirm whether Heritage Permit approvals are required for the work being considering;	Heritage permits will be required for the partial demolitions and new construction proposed for the site. These permits will likely be submitted at the time of the building and demolition permit stage as the detailed information will be available at that point to avoid amending heritage permits.
Where feasible, repair rather than replace all elements of a contributing resource. Where repair is not possible, use available historic material as precedent and avoid the use of standard or generic materials that are not appropriate to the contributing resource;	The proposed development will remove the existing windows and replaced with contemporary counterparts intended to following the historic profile and design as demonstrated in historical photography.
Do not restore based on conjecture. Use historic photographs, drawings, and physical evidence to inform interventions. Consider contacting the Municipal Heritage Committee or the local chapter of the Architectural Conservancy of Ontario for possible advice;	There are historical photographs and other imagery of the Greenfield Mill that can be used for restoration purposes. The original stone mill is intended to be restored, however, there is also the approach of rehabilitation which includes a contemporary addition to the upper level of the stone building and new addition to the rear.
Avoid the introduction of “new” materials and methods of construction if the original is still available and possible to conserve.	The rear wing is in poor condition and therefore the conservation of this structure has been challenged. In order to maintain legibility, the new addition will include vertical wood siding to pay homage to the previous wood structure while being of its own time.
Preference should be given for the restoration of features such as windows, doors, porches, and decorative trim, rather than replacement;	Stone masonry walls are intended to be restored as well as built features such as the chimney stack located to the east of the building complex. The proposal includes the replacement of windows and doors rather than replacement due to their existing condition. Some windows have been removed due to infilling of openings and therefore, some of the original windows are no longer available for restoration.

<p>Where replacement of features (e.g. – doors, windows, trim) is unavoidable, the replacement components should be of the same style, size, and proportions; Avoid the use of vinyl or plastic replicas of replacement features if possible, wood is generally a more appropriate material;</p>	<p>The windows are proposed to be 2 over 2 or 4 over 4 grills with a flat profile, aluminum-clad wood windows, in a deep bronze finish (https://bavarianwindows.com/portfolio/commercial/)</p>
<p>Similar building forms, materials, scale and design elements from the existing contributing resource should be incorporated in the adaptive reuse project or alteration;</p>	<p>The new addition will be placed on the existing stone foundation of the rear wing and continue to have the same footprint. The structure will include wood siding to reflect the existing wood structure. The height of the new addition will be the same height as the existing wing (four storeys). The gabled roofline will be used to book end either side of the building which reflects the original roofline of the building complex according to historical sketches from the 19th century.</p>
<p>Avoid concealing original parts of contributing resource, such as entrances and decorative details, when undertaking alterations;</p>	<p>There are limited areas where original parts of the contributing resource to be retained will be concealed, however, within a reversible manner.</p> <p>On the west elevation, a portion of two window openings on the first level of the primary stone structure while be concealed within an entrance, however, the entrance/ vestibule is proposed to be composed of glazing and should continue to be visible within the entrance way. A portion of the new addition(1 ½ storey profile), used for shipping/ receiving, waste management and back of house kitchen that will conceal a limited portion of the stone foundation of the existing rear wing.</p>
<p>If in doubt, use discretion and avoid irreversible changes to the contributing resource. A preference should be given to reversible alterations; and</p>	<p>The proposal will remove the rear wing and remove the two storey addition to the existing primary stone building. These changes are irreversible, however, changes to openings are intended to be completed in a manner that is reversible. The new glazed addition to the retained building is intended to be done in a manner that has the least amount of intervention.</p>
<p>Keep accurate photos and other records, and samples of original elements that have been replaced.</p>	<p>Documentation of the building has been completed including original elements. The intention is that material to be removed including the brick masonry, windows, doors, stone, is intended to be inventoried and stored for future use.</p>



Façade Guidelines (Section 13.1.2)	
Maintain the street-facing façade of the contributing resource. This is not an appropriate location for additions or interventions, such as new window (including dormers) or door openings, or alteration to the roofline;	The existing mill complex is situated away from Greenfield Road at the base of sloped topography. The removal of the two-storey addition existing on the primary building will lessen the impact of the appearance of massing along the street. There is a proposed new entrance on the north elevation, however, this is significantly distanced and screened from the public realm.
The rear of a contributing resource is a more appropriate location for an addition or intervention to reduce the visual impact on the streetscape or contextual value of Greenfield Heritage Conservation District;	The new addition is to the rear of the original primary building and will be size, scale and footprint reflective of the existing rear wing.
Additions should remain secondary in nature and clearly distinguishable from the existing contributing resource. This can be achieved, for example, through the use of an additional setback and/ or the use of traditional materials and finishes rather than exact duplicates of form to provide an appropriate transition between an addition and the existing contributing resource. Additions should not be visible from the street. Additions should be reversible;	Although the new addition will be similar in height to the existing primary stone building, the material and design will be distinguishable from the historic structure. The proposed material for the new addition will be vertical wood cladding which is 'play on' the original wood plank construction of the building. The addition is intended to be attached in a way that has minimal intervention and should not be clearly visible from the street as it is significantly distanced (130 metres). There is a portion of the addition that projects from the west elevation which includes the stairway, elevator and public corridor which is proposed to be standing seam metal cladding to juxtapose with the traditional stone and wood materials.
The architectural style of the contributing resource should be considered as a guiding influence in the design of an addition or alteration. Strict adherence is not required, but the principles of sympathy, respect, and context should be demonstrated in the design and finishes of an addition or alteration; and	The original stone building is of a utilitarian design intended for industrial uses. The gabled roofline and use of symmetrical openings lends itself to a design purposed for utility and not particular to an architectural style. Alterations to the primary stone building includes the establishment of a consistent rhythm related to window openings. The original gabled roofline that will be revealed following the restoration work is mimicked in the new addition. The addition is of similar scale to the retained stone building.

<p>Should the introduction of new exterior stairs be required for access or emergency exit purposes on a contributing resource, they should be situated at the rear or side of the structure, away from the streetscape, using materials and construction methods and finishes that are compatible with the contributing resource.</p>	<p>There are no exterior stairs (i.e. egress) proposed for the contributing resource. There will be new stairs to the entrances on the north and west elevation for access to these primary entrances to the building.</p>
<p>Roofing and Exterior Cladding Guidelines (Section 13.1.3)</p>	
<p>The use of overly bright colours should be avoided in the cladding of a contributing resource, including exterior walls and roofing. Neon and fluorescent colours should be avoided as well.</p>	<p>A neutral palette is proposed for the cladding of the new addition. There is a proposed upper level of the existing primary stone building and addition which will be composed of glazing. The proposed vertical wood cladding of the new addition is a muted brown colour.</p> <p>Standing seam metal cladding is proposed for a portion of the addition that projects from the west elevation which is purposed for the stairway. The colour of the addition will be either a copper bronze or a warmer bronze tone for metal cladding and accents.</p> <p>For the new wood cladding, a charred wood product in a medium tone (amber or natural) to pay respect to the historic grainhouse.</p>
<p>Asphalt shingles are the most prevalent roof cladding material within Greenfield Heritage Conservation District. Heritage Permit approvals are not required when replacing an asphalt shingle roof with the same.</p> <p>While steel or metal roofs exist, asphalt shingles remain the preferred roofing option. Clay tiles and flat roofs are not appropriate on residential dwellings in Greenfield Heritage Conservation District;</p>	<p>The existing building complex is industrial in nature. The majority of the roof is proposed to be a flat, platform roof composed mostly of glazing, however, the original stone gable roofline will be retained and present in the foreground as part of the buildings roofline; this is mimicked on the south façade of the new rear addition “book-ending” the building.</p>
<p>Alterations to the roof and roofline of a contributing resource visible from the street should be avoided;</p>	<p>The proposal includes the restoration of the original gabled roofline of the primary stone building which removes the two storey brick addition that was added to this building. The removal of this upper addition will lessen visual impact on the street.</p>



<p>Where possible, the roofing material should be consistent between a contributing resource and an addition;</p>	<p>The proposed roofing material will be consistent between the existing primary stone building and the new addition. The upper level will be clear glass with a platform roofline with the exception of the faux gabled roofline line on the north and south elevation.</p>
<p>Retain chimneys. Avoid removing chimneys, even if they are no longer functional, as they contribute to the rhythm of the built form in Greenfield Heritage Conservation District. If a chimney is no longer used, it should be capped and sealed by a knowledgeable tradesperson;</p>	<p>There are no chimneys to be retained. The brick smokestack, however, will be retained and restored as part of the proposal.</p>
<p>Contributing resources should be kept in a state of good repair so as to minimize damage caused by environmental factors; appropriate exterior cladding materials include wood, rough cast, brick or fieldstone where appropriate. These materials should be considered before using fiber-cement board, vinyl and aluminum cladding options. Cultured/faux stone and stucco are not appropriate cladding materials;</p>	<p>The historic stone masonry of the primary building will be restored. The proposed cladding of the rear addition is primarily vertical wood siding with the exception of a projecting portion which is proposed to be standing seam metal cladding to create a legible transition between old and new.</p>
<p>The painting of exterior masonry is not encouraged;</p>	<p>The proposal does not include the painting of exterior masonry.</p>
<p>Exterior masonry should not be sandblasted. Sandblasting is likely to permanently damage the surface of the brick or stone and may accelerate deterioration;</p>	<p>The proposal does not include sandblasting masonry. The masonry will be restored appropriately based on heritage best practices.</p>
<p>In the repointing of masonry, testing should be completed to utilize the appropriate composition of mortar for historic bricks (e.g. lime-based mortar compared to more contemporary Portland-based compounds);</p>	<p>Noted.</p>
<p>The cladding of an addition or alteration to a contributing resource should not attempt to “match” or replicate the cladding of a contributing resource, within reason. A different, but sympathetic material may be selected for the cladding of an addition or alteration. Sympathy, within the context of cladding, could be demonstrated through the selection of an appropriate colour that does not match but complements the historic material; and</p>	<p>The new addition primarily consists of vertical wood cladding of a subdued brown palette. This selection does not match but rather complements the historic stone material of the primary stone building.</p>
<p>Fiberglass and plastic versions of decorative trims should be avoided. Wooden decorative trim is preferred.</p>	<p>The windows will be modestly designed. Trim is to be confirmed.</p>

Doors and Windows Guidelines (13.1.4)	
Original or historic doors and windows should be conserved. The frames, glass, and decorative details have unique qualities and characteristics that are difficult to replicate;	The proposal includes the removal of remaining original doors and windows and replacement with contemporary counterparts that replicate the historic design of these features.
Original wood frame doors and windows can often be conserved through the use of new wooden products to match. Replacement should only be considered if restoration or other conservation approaches are not viable. The replacement of wooden windows with aluminum or vinyl windows of the same size, glazing pattern, and type will be permitted if the existing windows have deteriorated beyond repair; however, wooden windows are the preferred replacement. Where replacement is the only feasible option, the details of the door or window to be replaced should be maintained. Wooden flashing and trim detail should be retained and reinstated where possible;	Restoration of windows was considered, however, the state of deterioration of the existing windows is advanced. The wooden windows are intended to be replaced with aluminum windows. Wood flashing and trim detail have deteriorated.
If a door or window that has a decorative transom must be replaced with new, make every effort to conserve at least the transom at the top of the door or window opening;	The existing historic industrial building complex does not include decorative transoms for windows or doors.
Original door and window openings on the street facing facade should not be blocked up or covered as this can greatly alter the visual character of the contributing resource; and	The front (north elevation) is not easily visible from the Greenfield Road right-of-way or public realm. There is an existing opening for loading which will be altered to create one of the primary entrances for the building. Rather than concealing, the opening will be altered to create a larger, accessible entrance. Based on the utilitarian nature of the building, the 'street facing facade' does not lend itself as being defined or different than the modest and simplified nature of the other facades of the building.
Choose storm and screen doors that reflect the age and character of the house. Wood framed doors are much more preferable than aluminum screen / storm doors and have the added advantage of being able to be painted to complement the house.	Storm and screen doors are not proposed.



Porches and Verandahs Guidelines (Section 13.1.5)	
A porch or a verandah is not appropriate for the façade of every contributing resource within Greenfield Heritage Conservation District particularly where there is no historical precedent. The rear elevation of a contributing resource may be a more appropriate location for the addition of a porch or verandah;	An overhang is proposed for the north and west elevation for the entryways to provide some protection from the elements for guests/ attendees entering the building.
Existing porches and verandahs on contributing resources should be conserved. The removal or substantial alteration to the size, shape, and design of existing porches and verandahs is strongly discouraged; and	There are no existing porches and verandahs.
When restoring a porch or verandah that is either intact or completely demolished, research should be undertaken to determine the historic design which may have been much different from its current condition and decide whether to restore the historic precedent.	See above.
Utilities and Services and Guidelines (13.1.6)	
Service equipment, including dryer vents, electrical connections, and air conditioners, should not be located on the façade of a contributing resource; side or rear elevations are more appropriate; and,	This equipment is not proposed for the street facing façade.
Discussions should occur with utility providers concerning the placement of metres; new metres should be located on side or rear elevations.	Noted.

Table 7 provides the guidelines outlined within Section 13.3 of the GHCD Plan for new development and infill construction. It is important to note that the Subject Site, known as the former Greenfield Mill, was oriented, situated differently than the low-rise residential historic housing along Greenfield Road. Its industrial nature is reflected in its greater scale, massing, height, material/ composition, and its proximity to the Nith River, which was an important physical linkage to the surrounding area and therefore, it is important to consider this within the context of redevelopment.

Table 7. **HCD Guidelines for New Development**

New Development/ Infill Construction Guidelines (Section 13.3.1)	
Guideline	Response
New development/infill construction should be sympathetic to contributing resources;	The proposed new development is designed to be sympathetic to the contributing resource. There is the proposed removal of the two storey brick masonry addition to the original stone mill and the removal of the wood structure wing formerly used as the grain house. These changes are partly due to condition and also to facilitate the adaptive reuse of the building as a wedding venue.
New development/infill construction should be oriented towards the street;	As the site is unique, topographical and in relation to its former land use, the orientation to the street has a different nuance compared to the residential buildings along the Greenfield right-of-way. The front (north) elevation facing Greenfield Road, however, is intended to be designed in a way that is oriented northwards as the primary entrance to the building.
New development/infill construction should be 1-2 storeys in massing with a scale comparable to adjacent structures;	The existing building complex on-site is 4-6 storeys in height. The building complex is located south of the residential strip of buildings. The proposal will reduce the height of the primary stone building by two storeys to be of a height of approximately 4 storeys. This height and massing is representative of the building's historical use as a mill.
The setback for new development/infill construction should be the average of the setbacks located on either side;	The building complex is currently located approximately 104 metres from Greenfield Road; proposed new development will be located to the rear of the front (north) elevation and therefore this setback will be maintained.
A traditional relationship of solid (wall structure) to voids (windows and doors) should be demonstrated. Glass walls are not appropriate on the façade of a new development/infill construction, but may be located on the rear elevation;	A solid wall structure is proposed for the new addition to the rear. The upper storey that is proposed for the primary stone building and the new addition is proposed to be clear glass to reduce the appearance of massing and scale.



<p>Hip or gable roofs are the most common within Greenfield Heritage Conservation District and should be demonstrated in new construction/infill development. Mansard roofs, pagoda-style, and flat roofs are not appropriate for residential dwellings;</p>	<p>A pseudo gabled roofline will be located on the north and south elevation. The north elevation will expose the original gabled roofline of the historic stone mill whereas the south will be replicated as the opposite 'book end' of the building. The remaining roofline will be flat to reduce massing and appearance from Greenfield Road. The building is not considered residential and historically has been industrial.</p>
<p>Demonstration of more traditional architectural styles/influences is appropriate to Greenfield Heritage Conservation District. Contributing resources demonstrate the Gothic Revival, Regency, and "saltbox" workers cottages styles, which may be a source of inspiration for new construction/infill development;</p>	<p>This property is representative of mill infrastructure and industrial land uses. The style is utilitarian in nature. However, the gabled roofline is incorporated into the design.</p>
<p>Brick and wood siding are the preferred exterior cladding materials for new construction/infill development in Greenfield Heritage Conservation District. Other materials have less historical precedence;</p>	<p>Wood siding is proposed primarily for the rear addition. There is a projecting segment of the addition along the western elevation that is proposed to be standing seam metal cladding to juxtapose between the old and new.</p>
<p>Bright, neon, and fluorescent colours should be avoided; and</p>	<p>Bright, neon and fluorescent colours are not proposed.</p>
<p>Parking areas should be located behind or next to the main dwelling. Garages are most suitably located at the rear of a dwelling. Front yard parking should not be permitted.</p>	<p>Parking is located to the north of the building due to the flood plain. In order to adaptively reuse the building complex and provide adequate parking, particularly in this rural location, there is no other option but to include the parking to the north of the building complex. The parking will be screened by vegetation but should be addressed through mitigation measures.</p>

7.3 Impact Analysis

Development impacts can be either direct or indirect, and they may impact resources and landscapes differently over time. Impacts can be adverse, neutral, or beneficial. The construction process itself can cause effects on resources and landscapes during various stages such as the pre-construction phase when the site is being prepared for construction, the construction phase, and the post-construction phase when protective barriers are removed. The description of adverse impacts, as outlined in the Ontario Heritage Tool Kit, Info Sheet #5 are provided in **Table 8**.

Impacts are assessed as it relates to identified heritage attributes. The GHCD identifies heritage attributes of the property which is reviewed in sub-section 2.3.1 of this report and outlined below:

- Historical associations with Scottish settler John Goldie and his establishment of the earliest water-powered mill on this section of the Nith River;
- Historical association with the Greenfield Milling Company, one of the largest flour mills in North Dumfries that supplied an international market;
- Physical/design value as a four-storey stone mill and attached four-storey stacked-plank storehouse built by David Goldie between 1863 and 1865 and additional brick storeys added in the 1890s;
- Physical design value as rare example of a large intact milling site that evolved from water-power to steam power in the second half of the nineteenth century and continue to operate until 1965. The milling site includes a mill with attached storehouse, separate mill office, remnant dam, sluice gates, mill pond and mill race, as well as industrial artefacts including remnant railway lines and a cast iron fire pump housed in a separate brick structure;
- Physical/design value as a rare example of stacked plank construction from the 1860s used to construct a large grain storehouse attached to a mill building; and,
- Physical/design value as a typical example of a large fieldstone mill constructed in the 1860s, similar to other examples in the Township including the Goldie Mill in Guelph which was constructed around the same time.


 Table 8. **Direct and Indirect Adverse Impacts**

Direct/ Indirect	Adverse Impact	Description
<i>Direct Impacts</i>	Destruction	Destruction of any, or part of any, significant heritage attributes or features.
	Alteration	Alterations that are unsympathetic or incompatible with the cultural heritage value or interest of the property.
<i>Indirect Impacts</i>	Shadows	Shadows or obstruction that alter the appearance of a heritage attribute or change the viability of the attribute (e.g. blocking sunlight to natural features or plantings that have been identified as heritage attributes).
	Isolation	Isolation of a heritage attribute from its surrounding environment, context or a spatial/ significant relationship that contributes to cultural heritage value or interest.
	Obstruction of Views (Direct or Indirect)	Direct or indirect obstruction of views or vistas within, from, or of built and natural features.
	Change in Land Use	A change in land use such as a rezoning of a battlefield from open space to residential use, allowing new development or site alteration to fill in the formerly open spaces.
	Land Disturbances	Land disturbance such as vibrations that occur from construction activity, change in grade that alters soils and drainage patterns and may adversely affect attributes of a cultural heritage resource (built heritage resource or cultural heritage landscape), archaeological resources or areas of archaeological potential.

The impacts on a cultural heritage resource or landscape can either be specific to the site or widespread, and they can vary in severity from none, negligible, low, moderate, or high. The International Council on Monuments and Sites (ICOMOS) and the OHTK provides guidance for gauging severity in the publication *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* (2011) and *Info Sheet #5*, respectively, which can be applied at a micro-level.

The graduation of severity ranges from beneficial, neutral/ no change, negligible adverse, minor adverse, moderate adverse and major adverse impacts. The following **Table 9** provides a description of each level of impact.

Table 9. **Direct and Indirect Adverse Impacts**

Levels of Adverse Impacts to Cultural Heritage Resources	
Major	Change to key historic building elements that contribute to OUV, such that the resource is totally altered. Comprehensive changes to the setting.
Moderate	Changes to many key historic building elements, such that the resource is significantly modified. Changes to the setting of an historic building, such that it is significantly modified.
Minor	Change to key historic building elements, such that the asset is slightly different. Change to setting of an historic building, such that it is noticeably changed.
Negligible	Slight changes to historic building elements or setting that hardly affect it.
Neutral/ No Impact	No change to fabric or setting.

The subsequent sub-sections examine the potential impact of the proposed development based as outlined in the Ontario Heritage Toolkit including destruction, alteration, shadows, isolation, direct or indirect obstruction of views, change of land use, and land disturbances, within the context of the levels of impact provided above.



7.3.1 Destruction

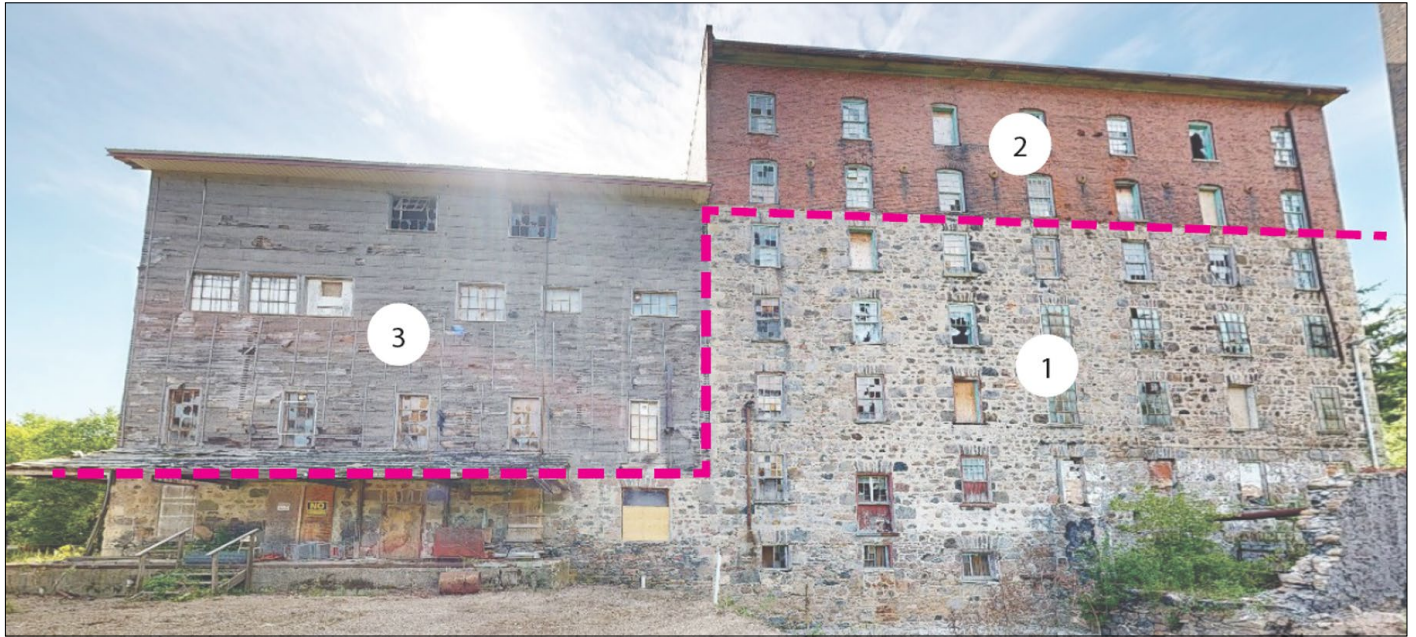
Moderate Impact

The development proposes the removal of the additional brick storeys added in the 1890s and the removal of the four-storey stacked plank storehouse (see **Figure 31 and Appendix 'B' for Demolition Plan**). The stacked plank construction considered a rare example of construction from the 1860s is identified as a heritage attribute; this will be removed as part of the proposal. The building was known as the 'largest flour mills' and therefore its size is considered a heritage attribute. The partial demolitions removing these portions of the building is considered a moderate impact as it is a change such that the resource is significantly modified including the setting.

In addition to removal of portions of the extant building complex, there will be a permanent loss of approximately 0.25 ha of the deciduous forest and 0.4 ha of cultural woodland communities. These, however, are not identified as a heritage attribute specific to the cultural heritage value of the site but are rather addressed specifically within the GHCD. There is potential for the destruction of the remnant railway lines on-site and mill related infrastructure to facilitate parking and new entrance.

Figure 31. **Building Fabric to be Demolished**

Martin Simmons Sweers Architects, 2026





7.3.2 Alteration

Minor Impact

The removal of the additions will require stabilization of the retained structure and restoration of stone masonry. New additions will require integration with the existing structure which will require alterations. The proposal includes the addition of new stairs, overhangs for the entrances which requires support from the existing building envelope.

The existing windows and doors are proposed to be replaced with contemporary counterparts with a historic aesthetic look.

The existing stacked chimney and mill infrastructure is proposed to be restored as part of the proposal. There may be some alterations required to ensure appropriate integration into the site to facilitate the property's new use. There may be alterations to remnant mill infrastructure including remnant dam, sluice gates, mill pond and mill race.

The Part V heritage designation does not apply to the interior of the building, however, there will be interior changes made to the building to ensure that the proposed new occupancy will meet the requirements of the Ontario Building Code. This may include upgrades in mechanical, electrical and plumbing systems and accessibility improvements. These alterations are needed to facilitate the adaptive reuse of the building to provide a viable use for long-term conservation.

Change to key historic building elements, such that the asset is slightly different. Change to setting of an historic building, such that it is noticeably changed.

7.3.3 Shadows

No Impact

The proposed new development will reduce the height of the existing building complex. The new addition to the rear will be a consistent height with the original historic stone structure. Shadows will not result in adverse impacts to the identified heritage attributes.

7.3.4 Isolation

Negligible Impact

The existing mill complex has important linkages to the Nith River, the former railway line and the worker's cottages along Greenfield Road which provided housing for the mill industry. Its association with mill infrastructure and remnants thereof contributes to the cultural heritage value of the site. The proposed development will not impact the building's relationship to the river or to the street or infrastructure, however, parking may have an impact on the historic setting of the property as there will be a significant portion of the site comprised of surface parking/ hardscaping which otherwise would be naturalized. Additionally, a new entrance on the north elevation will conceal the former railway ties that still are present on site.

7.3.5 Direct or Indirect Obstruction of Views

No Impact.

The heritage attributes of the property do not include significant views or vistas, however, Section 8.2.1 of this report reviews the significant views identified in the GHCD. There is a significant closed/ short view identified in sub-section 8.4.1. (pp.33) of the Plan commencing approximately from 3066-3067 Greenfield Road looking westwards along Greenfield Road towards 3089 Greenfield Road. The proposed development results in the reduction of height of the existing building so it would reduce the appearance of building mass along the road.

7.3.6 Change in Land Use

Beneficial Impact.

The proposed adaptive reuse of the building for commercial purposes allows for greater flexibility in permitted uses which broadens the viability of the building and therein long-term conservation. Therefore, the change of land use in retrospect can be considered a beneficial impact for the property as it allows for a greater variety of adaptive reuse opportunities.

7.3.7 Land Disturbances

Potential Impact.

An archaeological assessment has not yet been completed for the property as it will be completed as part of the Site Plan Approval process. There is potential that there could be impact to archaeological resources as a result of the redevelopment of the property, however, there will be limited disturbances as the construction is refrained to the existing footprint of the building complex and surface parking.

There will be impacts to the trees on-site, however, these are not identified as individual attributes of the property. The removal of trees are assessed as part of the review of compatibility with the GHCD Plan in Section 8.2 of this report.



7.4 Summary

Overall, the proposal is compatible with the GHCD Plan policies and guidelines with the exception of the following:

- Impact as a result of the removal of some trees on the private property;
- Removal of original window and door frames;
- Potential impacts as a result of a new, double lane driveway off of Greenfield Road;
- Potential impact as a result of new parking if not appropriately screened;
- Removal of original grainhouse and two storey brick addition, although required as part of the adaptive reuse of the property; and,
- Method of attachment of the new addition.

Based on an assessment of impacts to the Subject Site based on the CHVI and Heritage Attributes identified in the GHCD, the following impacts have been identified:

- *Destruction* – **Moderate Impact** -Partial demolition of later brick storeys and the four-storey stacked plank storehouse will result in the loss of a rare 1860s construction method and a portion of the historically significant mill massing.
- *Alteration* – **Minor Impact**- Stabilization and integration of new additions will introduce limited alterations to the historic fabric, including new openings, contemporary window and door replacements, and entrance features.
- *Isolation* – **Negligible Impact**- The mill's historic relationships to the river, street, and associated infrastructure are preserved. Surface parking may slightly affect the setting but does not sever key historic linkages.

- *Change in Land Use* – **Beneficial Impact**- Adaptive reuse for commercial purposes increases flexibility, viability, and prospects for long-term conservation.
- *Land Disturbance* – **Potential Impact**- Archaeological resources may be affected pending future assessment, though disturbance is limited to the existing building footprint and surface parking. Tree removal occurs but does not impact heritage attributes.

The proposal does not pose impacts of shadows, indirect or direct obstruction of views.

8. MITIGATION AND CONSERVATION RECOMMENDATIONS

8.1 Alternative Development Options

8.2 Recommendations for Mitigation and Conservation

8.3 Implementation and Monitoring



8.1 Alternative Development Options

As there were adverse impacts identified in Section 8.0 of this report, alternative development options are explored. It should be noted that the options presented below are not exhaustive but rather represent scenarios that would be logical alternatives for the Subject Site. The alternatives have been integrated into the following alternative development options outlined in this section; these options were guided by the approaches to conservation outlined by the Standards and Guidelines for the Conservation of Historic Places in Canada (“S&Gs”).

The current proposal described in Section 4.0 includes a hybrid approach of restoration and rehabilitation. The following provide alternative development options following separately the conservation approaches outlined in the S&Gs.

8.1.1 Option 1: Do Nothing / Leave Lands as Is (Preservation)

- **Not Recommended**

The "do nothing" approach is a passive strategy in heritage property ownership that emphasizes non-intervention and minimal or no upkeep. While it preserves the historical authenticity leaving the building complex untouched, it poses risks related to property deterioration, vandalism and trespassing, and potential long-term financial implications. The property has been vacant for over a decade.

This option would consist of retaining the building as is with continued zoned use.

This approach would be considered “Preservation” which is considered appropriate when 1) *materials, features and spaces of historical place are essentially intact and convey the historic significance, without extensive repair or replacement;* 2) *Depiction during a particular period in its history is not appropriate;* and 3) *Continuation or new use does not require extensive alterations or additions.*

The proposed new use of the property is not currently compatible with the existing zoning for the property. If the zoning were to change to permit additional uses as is included in this proposal, the new use will require alterations and a new addition to facilitate its use as a wedding venue. Part of the current proposal includes a hybrid of restoration and rehabilitation in addition to extended uses which is considered better options for the long-term viability of the property than ‘doing nothing’ or leaving the land ‘as is’.

8.1.2 Option 2: Restore to Original 1850s Mill Complex (Restoration)

- **Not Recommended**

This option would consist of retaining and restoring the original Mill Complex. This approach would be considered “Restoration” which is considered appropriate when 1) *An historic place’s significance during a particular period in its history significantly outweighs the potential loss of existing, non-character-defining materials, features and spaces from other periods;* 2) *Substantial physical and documentary or oral evidence exists to accurately carry out the work; and,* 3) *Contemporary additions or alterations and are not planned.* This approach would include the restoration of the building to its original 1850s appearance and the removal of the 1860s grain house and 1880s brick addition. Restoration is intended to depict a specific period of time. The 1860s and 1890s addition are considered part of the contributing value of the property and will be considered a loss. Although there are existing physical documentary and

oral evidence, some of it is illustrative and therefore some restorative works may be based on conjecture which should be avoided. The adaptive reuse requires contemporary additions and alterations to facilitate the new use.

A review of the condition of the former grain house (reviewed in sub-section 6.1.3 of this report) completed by Tacoma Engineers, who are members of the Canadian Association of Heritage Professionals, indicate that this structure is in poor condition. The removal of portions of the plank construction challenges the end authenticity of this structure following restorative work and alternative options have been proposed, such as exposing a portion of the wall construction as a feature within the new addition.

The restoration of the original stone mill includes the restoration of existing masonry and revealing of the original gabled roofline which will be maintained as a feature of the development. The original foundation and building form will be maintained with the new addition.



8.1.3 Option 3: Rehabilitate Existing Building Mill Complex (Rehabilitation)

■ Partially Recommended

This option would include the retention of the existing building complex, including two storey brick addition and rear wing, rehabilitation of this space for future adaptive re-use. This approach would be “Rehabilitation” which is considered appropriate when 1) *Repair or replacement of deteriorated features is necessary*; 2) *Alterations or additions to the historic place are planned for a new or continued use*; and 3) *Depiction during a particular period in its history is not appropriate*. This option would include the incorporation of some contemporary elements unlike the approach of restoration.

This option could include alternatives such as:

1. *Retain and rehabilitate the building mill complex as it is exists in its current form; or,*
2. *Retain and rehabilitate the building mill complex with the retention of the upper brick masonry addition but removal of the rear wing.*

The rehabilitation options that propose full retention of the existing mill complex, including the upper brick storeys and rear wing, present several practical and contextual challenges related to building condition, functionality, accessibility, and compatibility with the surrounding Greenfield community. The grain house is in poor physical condition, requiring substantial structural intervention that would significantly increase cost and complexity while limiting design flexibility. Retaining the full four-storey height and massing of the historic mill, together with the later brick additions, constrains opportunities to improve functionality, particularly given the low-rise residential character of the surrounding neighbourhood, where the existing scale is already visually prominent and difficult to reconcile.

Functional reuse of the upper brick storeys is further challenged by accessibility constraints: the proposed new elevator is intended to be accommodated within a new addition and would not extend to the uppermost brick levels, resulting in inaccessible floor space that would be difficult to program in compliance with contemporary building and accessibility standards. In addition, the adaptive reuse of the building as a wedding and event venue raises concerns regarding noise transmission from the fifth and sixth storeys, which would be difficult to adequately mitigate given the building’s historic construction and proximity to sensitive residential uses. Collectively, these factors limit the feasibility of retaining and rehabilitating the full extent of the upper brick storeys and rear wing, despite the theoretical appropriateness of an alternative rehabilitation approach, and underscore the tension between heritage retention, functional viability, and community compatibility.

Figure 32. **Alternative Retention Scenarios for Rehabilitation**

Martin Simmons Sweers Architects, 2026





8.1.4 Summary

Overall, the evaluation of alternative development options demonstrates that while multiple conservation approaches were considered in response to the identified adverse impacts, none offer a fully viable standalone solution without significant limitations. A “do nothing” preservation approach is not recommended, as the prolonged vacancy of the site, incompatible zoning, and lack of active use pose substantial risks to the long-term condition and security of the heritage resource. A full restoration to the original 1850s mill complex is also not recommended, as it would require removal of later contributing elements, rely in part on conjectural reconstruction, and fail to accommodate the contemporary additions and alterations necessary for adaptive reuse, particularly given the poor condition of the grain house. Rehabilitation of the existing mill complex is generally the most appropriate conservation approach; however, options that rely on full retention of the upper brick storeys and rear wing present significant challenges related to structural condition, functionality, accessibility, noise impacts, and compatibility with the surrounding low-rise residential Greenfield community. As a result, rehabilitation is only partially recommended, reinforcing the conclusion that a hybrid approach, balancing selective restoration, rehabilitation, and sensitive new construction, is the most pragmatic means of conserving heritage value while ensuring functional viability, community compatibility, and long-term sustainability of the property.

8.2 Recommendations for Mitigation and Conservation

8.2.1 Mitigation Recommendations

If the proposed development proceeds in its current form, and in consideration of the impacts identified in Section 8.0 of this report, the following mitigation measures are recommended:

1. Documentation and Salvage Plan

A Documentation and Salvage Plan should be prepared prior to any selective demolition. This plan should include:

1.1 Documentation Requirements

- Comprehensive photographic record of the building’s exterior and interior, capturing all elevations, character-defining features, construction materials, and architectural details.
- Digital scanning or 3D modelling, noting that the Client has already completed exterior and interior modelling as of March 2026 (Matterport 3D scan) <https://my.matterport.com/show/?m=H7wUVS2dfAg>.
- Inclusion of existing architectural drawings, such as elevations and floor plans, to complement the visual record (see Appendix ‘B’)

- This documentation will serve as a permanent historical record of Greenfield Mill, allowing future researchers and the public to understand its evolution and the modifications that occurred over time. The documentation should be provided to local archival collections including the North Dumfries Historical Preservation Society and the Waterloo Region Library Local History Collection.

1.2 Salvage of Heritage Materials

- Identification of materials that can be feasibly recovered (e.g. windows, doors, brick, stone, plank construction material).
- An outline of the methods of extraction, including equipment needed, personnel responsible, and the scheduling of salvage activities to avoid damage.
- Recommendations for reuse or repurposing of salvaged materials, either integrated into the new development or used in commemorative or interpretive installations.
- The current proposal includes the salvaging of a portion of the historic plank construction and reinstatement within the new addition as an interior feature. The process of how this will be completed and final design will have to be detailed within this Plan.
- The current proposal includes the salvage of brick masonry for hardscaping and possible repurposing for the restoration of the mill infrastructure to be used as bridal gardens around the chimney stack. This approach should be explained in this Plan.
- The salvage and repurpose of stone for openings should be described in this Plan.
- If feasible, the railway ties that are situated immediately to the front of the north elevation should be salvaged and repurposed creatively on site. Consideration should be made for their incorporation into the front entrance.

2. Commemoration / Interpretation Plan

A Commemoration Plan should be developed to communicate the history and significance of the Greenfield Mill to the public and provide information on the portions of the building proposed for demolition. The Plan should include:

2.1 Commemorative Approach

- Identification of appropriate interpretive methods, such as:
 - Interpretive panels or plaques
 - Landscape-integrated markers
 - Digital or interactive platforms
 - Incorporation of salvaged materials
- Messaging should provide an accessible and engaging narrative of the mill's history and its role within the community. It should also consider the spatial organization of the site between the mill infrastructure, mill and proximity to the Nith River. Also, consideration could be made to commemoration within the location of the closed historic West entrance/ access which could be used as a commemorative garden space and the former mill race.
- Considerations should be made for commemorative plantings in association with John Goldie, who was a Scottish Botanist who named Greenfield and established the Greenfield Mill. Three of the plants identified by Goldie include: *Dryopteris Goldieana* (Goldie's Wood Fern), *Sellaria Longpipes* (Long-stalked Starwort) and *Drosera Linearis* (Linear-leaved Sundew). Additional plantings, such as the Douglas Fir, named after Goldie's friend David Douglas, a fellow botanist and apprentice of Goldie could also be considered. A Douglas Fir was planted by the John Goldie at the Gore Estate in Ayr to honour his friend.



2.2 Location and Visibility

- Commemorative elements should be placed in locations that are visible and/or accessible to the public.

3. Landscape and Design Considerations

3.1 Landscape and Setting Conservation

- A Landscape Plan shall be implemented that reflects the historic rural character of Greenfield Road and commemorates the site's cultural landscape history. Consideration should be made to the circulation on site between features such as the mill infrastructure, mill and proximity to the Nith River. Respect should be made for the topography of the former mill race towards the east elevation (this area is within the floodplain).
- Tree and shrub plantings shall be used to screen the new driveway and parking areas, particularly along visually sensitive areas, including the north end of the property and particularly at the entrance of the new driveway along Greenfield Road.
- Landscaping shall prioritize naturalistic, indigenous plantings, consistent with early settlement patterns in Greenfield.
- Where possible, native tree species shall be selected for new plantings. Indigenous species that would have been widely available during early settlement shall be prioritized, with reference to Appendix F of the GHCD Plan and resources from the Grand River Conservation Authority Forestry Department.

3.2 Tree Protection and Natural Features

- A Tree Preservation Plan, required as a condition of Site Plan Approval (SPA), shall be followed and implemented in full. During construction, protective measures shall be installed to safeguard all preserved trees and adjacent natural areas. Within 12 months following construction, preserved trees shall be reviewed to assess their condition, and remedial action shall be taken where required.
- Any required replanting shall consist of native species, as outlined in Appendix F of the GHCD Plan.
- Grading and excavation activities shall be carefully managed to respect existing topography, particularly in relation to the historic mill race and views from Greenfield Road.

3.3 Circulation/ Parking

- The character-defining features of Greenfield Road, including grassed verges, gravel shoulders, and open drainage swales, shall be conserved with the introduction of a new driveway. The new driveway is recommended to be designed without curb treatments and instead incorporate gravel shoulders and shallow, open drainage swales.
- Potential visual and spatial impacts shall be mitigated through sensitive grading and enhanced landscaping. Alternative paving methods should be considered such as permeable paving for the entrance way.
- Proposed grading and landscaping should be completed in a manner that sensitively screens the surface parking proposed for the site.

8.2.2 Conservation Measures

Scoped Conservation Plan

The following recommendations should be completed in a manner that is consistent with the Standards and Guidelines for the Conservation of Historic Places in Canada, Building Resilience: Practical Guidelines for Sustainable Rehabilitation of Buildings in Canada and the Region of Waterloo Practical Conservation Guidelines for Heritage Properties. A Scoped Conservation Plan should be prepared to guide the short-, medium-, and long-term conservation of the retained building fabric. The Plan should address:

3.1 Stabilization Measures and Demolition Plan

- Structural stabilization prior to demolition of adjacent building components.
- Ongoing protection during demolition and construction phases.
- Final stabilization and weatherproofing upon completion of surrounding works.
- Demolition Plan has been prepared and is included in Appendix 'B' of this report.

3.2 Temporary Protection Plan

- Protective hoarding, environmental controls, and access limitations to ensure the retained structure is not compromised.
- All grading, servicing, and construction activities shall avoid unnecessary disturbance to heritage attributes and natural features.
- A risk management strategy covering all phases of on-site activity.

3.3 Conservation Guidelines

- Restoration of stone masonry as per the S&Gs;
- If possible, the restoration of windows and doors using storm windows for energy performance upgrades. If this is not feasible, careful consideration will be given to the material, colour and pane configuration.
- Reversibility of proposed changes such as the attachment of the new addition, changes to openings and anchoring of overhangs for primary entrances.

The conservation work should align with the Standards and Guidelines for the Conservation of Historic Places in Canada, ensuring that all interventions respect heritage conservation best practices.



8.3 Implementation and Monitoring

Implementation and monitoring of the above recommendations should be as follows:

1. Documentation and Salvage Plan

Timing: Processed as part of the Heritage Permit Application Submission which is required prior to demolition.

Responsibility/Personnel: Heritage Consultant, Developer, Architect and Demolition Contractor.

2. Commemoration/ Interpretation Plan

Timing: Carried through to final Site Plan Approval and/ or as part of the Heritage Permit Application Submission.

Responsibility/Personnel: Heritage Consultant and Developer.

3. Landscape and Design Considerations

Timing: Carried through to final Site Plan Approval (landscaping, Tree Management/ Preservation Plan) and processed as part of the Heritage Permit Application Submission (design).

Responsibility/Personnel: Heritage Consultant, Developer, Architect, Landscape Architect.

4. Scoped Conservation Plan

Timing: Condition of Site Plan Approval and/ or Heritage Permit Application submission. Implementation of short- and medium-term goals can be monitored by the Owner's heritage consultant and City Staff.

Responsibility/Personnel: Heritage Consultant, Developer, Structural Engineers, Masonry Specialist (Optional).

9. CONCLUSION



The Biglieri Group Ltd. was retained by Greenfield Mill Co. to prepare a Scoped CHIA for the property municipally addressed as 3089 Greenfield Road, Ayr, Ontario (known locally as the Greenfield Mill). The Subject Site is located within the Greenfield Heritage Conservation District and therefore is designated under Part V of the *Ontario Heritage Act* as a Protected Heritage Property.

This Scoped CHIA assessed the proposed redevelopment of the Greenfield Mill property within the context of the Greenfield Village Heritage Conservation District (GHCD), the identified cultural heritage value and attributes of the site, and the guiding principles set out in the Standards and Guidelines for the Conservation of Historic Places in Canada.

Overall, the proposed development is largely consistent with the objectives, policies, and guidelines of the GHCD Plan. The proposal strengthens the long-term conservation prospects of the property through adaptive reuse, reintegration into active use, and investment in stabilization and restoration of the surviving historic stone mill structure. The introduction of a viable commercial use, particularly one that supports public access and awareness, is recognized as a beneficial outcome that addresses the risks associated with prolonged vacancy, deferred maintenance, and continued deterioration of the site.

The impact assessment undertaken in Section 8.0 identifies a range of effects associated with the proposed development. These include a moderate impact related to destruction resulting from the removal of later brick storeys and the four-storey stacked plank grain house, which represents a rare 1860s construction method and contributes to the historic massing of the mill complex. Minor impacts related to alteration are identified as a result of stabilization works, integration of new additions, replacement of windows and doors, and the introduction of new access features necessary to support the proposed adaptive reuse.

Negligible impacts related to isolation due to the introduction of surface parking, beneficial impacts associated with change in land use which underscore the importance of adaptive reuse in ensuring the site's long-term viability. Potential impacts associated with land disturbances, including archaeological resources and tree removal, are recognized but can be appropriately addressed through future assessment and site plan controls. Importantly, the proposal does not introduce adverse impacts related to shadows or obstruction of significant views as identified in the GHCD Plan.

Where the proposal diverges from GHCD policies and guidelines, including the removal of trees, loss of original window and door frames, introduction of a new driveway and parking areas, removal of the grain house and brick addition, and questions regarding the reversibility of the new addition, have been carefully considered and balanced against the functional requirements of adaptive reuse, the physical condition of the buildings, and the broader conservation objectives of the site. In particular, the removal of the grain house and later additions, while recognized as adverse from a heritage standpoint, is supported by technical evidence demonstrating poor structural condition and limited feasibility for continued retention without compromising authenticity or functional viability.

In response to these identified impacts, a comprehensive review of alternative development options was undertaken. The analysis demonstrates that a "do nothing" preservation approach is not appropriate given the site's prolonged vacancy, incompatible zoning, and the high risk of continued deterioration. A full restoration to the original 1850s mill form was also found to be impractical, as it would necessitate the removal of later contributing elements, rely in part on conjectural reconstruction, and fail to accommodate the contemporary interventions required for adaptive reuse. Rehabilitation of the entire existing mill complex, while conceptually aligned with heritage best practices, is only partially recommended due to significant challenges related to structural

condition, accessibility, noise mitigation, functional programming, and compatibility with the low-rise residential character of the Greenfield community.

As a result, the assessment supports the conclusion that the current proposal's hybrid approach to conservation, combining selective restoration of the original stone mill, rehabilitation of retained elements, and sensitive contemporary additions, is the most balanced and pragmatic option available for the building's continued use. The mitigation and conservation recommendations outlined in Section 9.2 provide a robust framework to further reduce adverse impacts and enhance heritage outcomes. These measures, including comprehensive documentation and salvage prior to demolition, interpretation and commemoration of lost elements, sensitive landscape design, tree preservation strategies, reversibility of new interventions, and the preparation of a Scoped Conservation Plan, ensure that heritage values are respected, understood, and sustained over time. Implementation and monitoring measures further reinforce accountability and ongoing stewardship through coordinated roles for heritage consultants, designers, engineers, and City staff.

In conclusion, while the proposed development will result in the loss of certain historic building components and landscape elements, these impacts are justified within the broader context of adaptive reuse, structural realities, and long-term conservation goals. With the application of the recommended mitigation and conservation measures, the proposal represents a defensible and appropriate balance between heritage conservation, functional reuse, and community compatibility, securing a sustainable future for the Greenfield Mill as a valued cultural heritage resource within the Greenfield Village Heritage Conservation District.

Lastly, allowing the property's inclusion in the Greenfield settlement area, which historically it has contributed to over the past 170 years, and permitting extended uses, supports the long-term conservation of this significant cultural heritage resource and overall Greenfield Heritage Conservation District.



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11. APPENDICES

Appendix A: Site Plan, Elevations & Renderings

Appendix B: Existing Drawings & Photographs

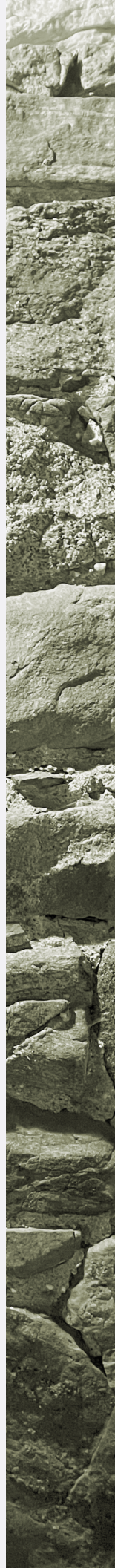
Appendix C: Demolition Plan

**Appendix D: Building Condition Assessment
Brief**

**Appendix E: Township's Terms of Reference for
Scoped CHIA**



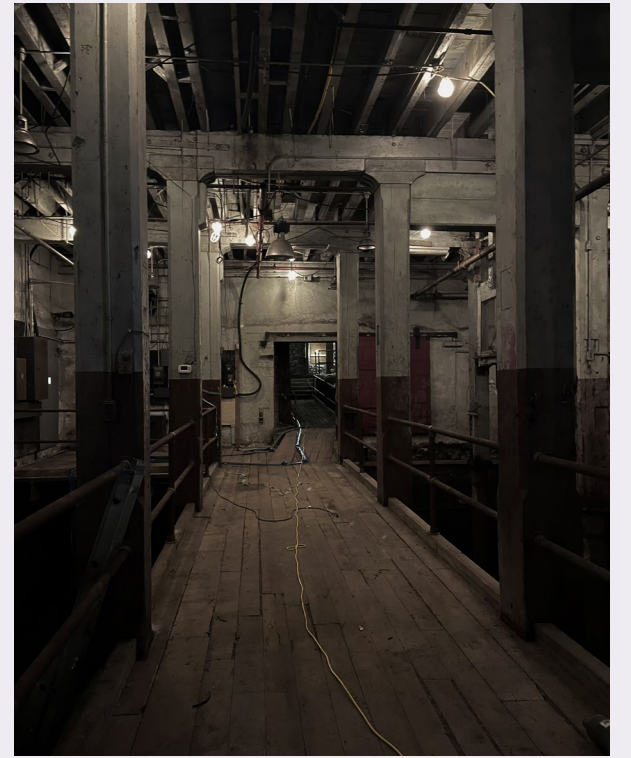
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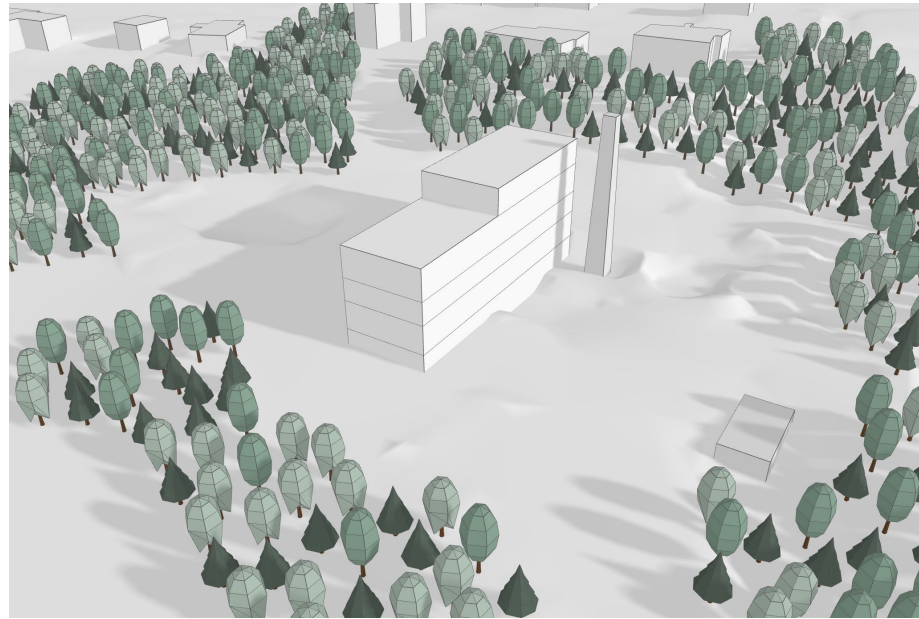


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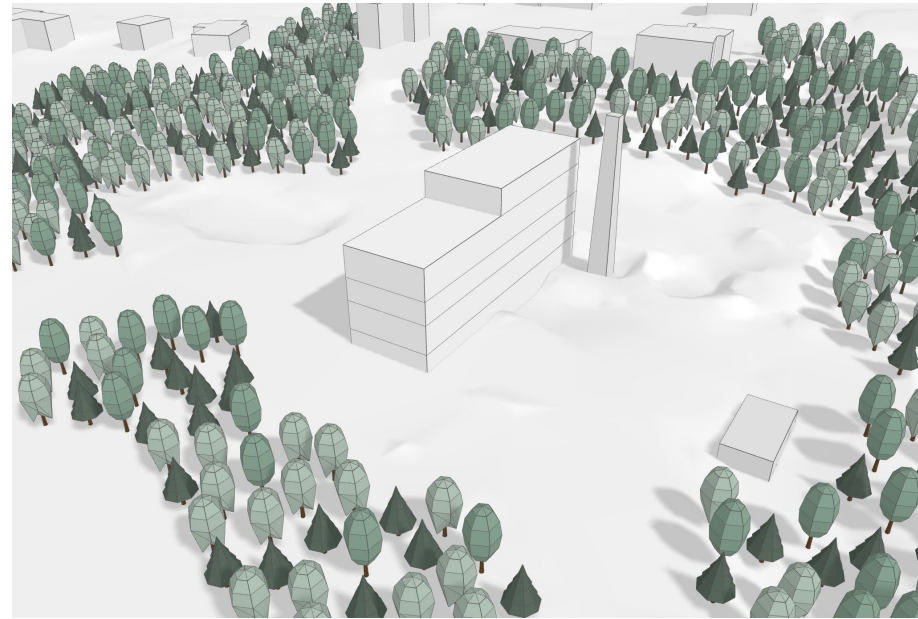
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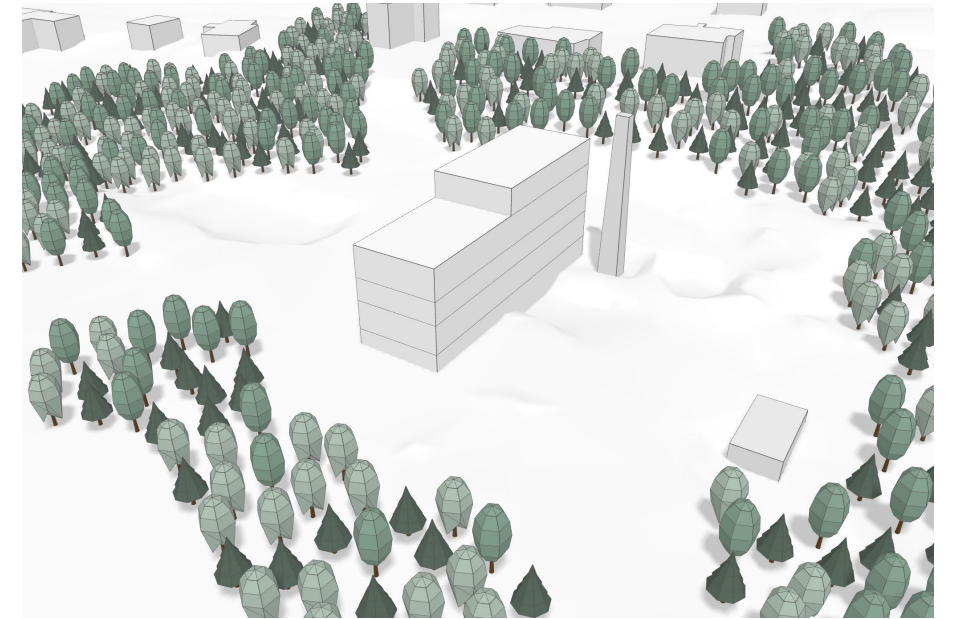




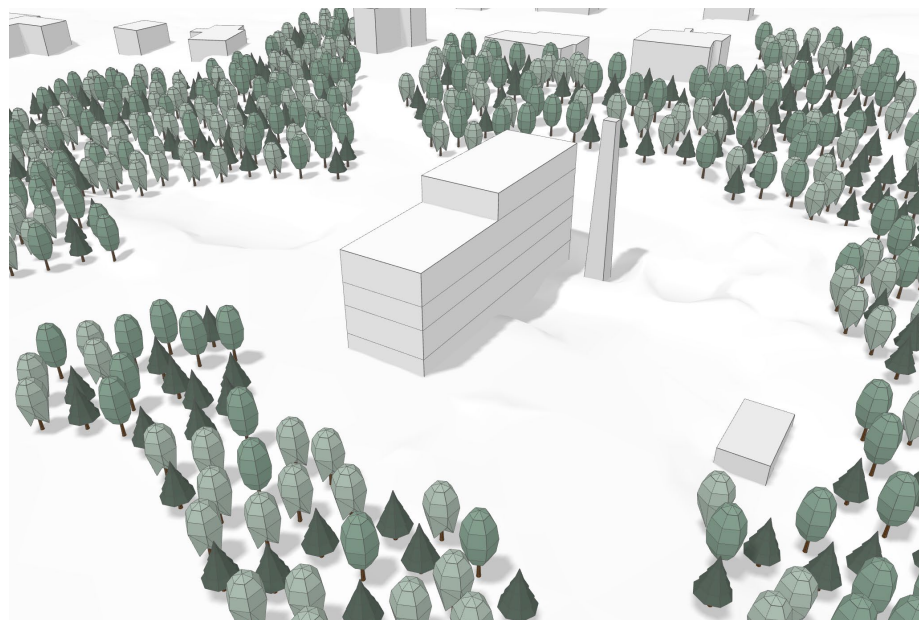
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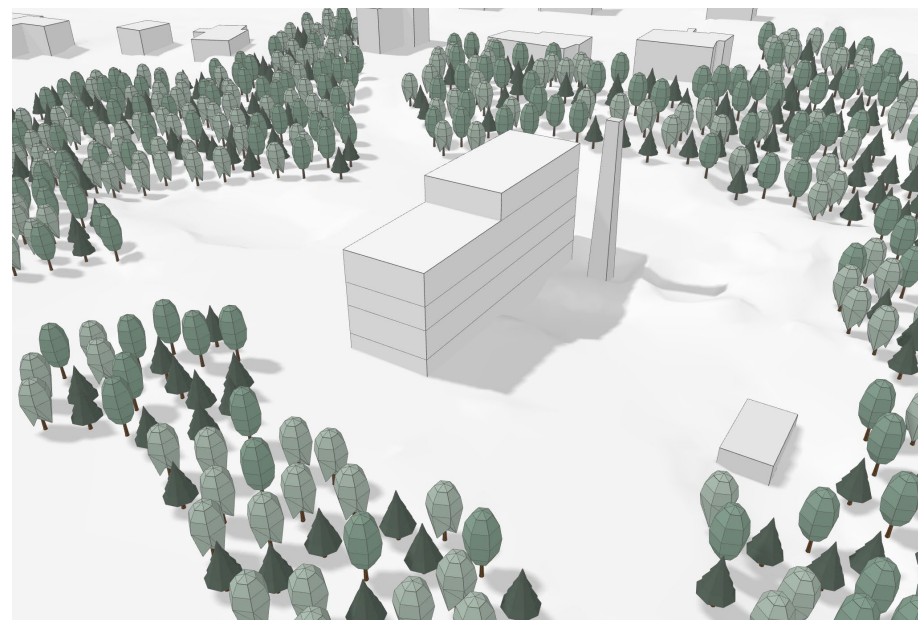
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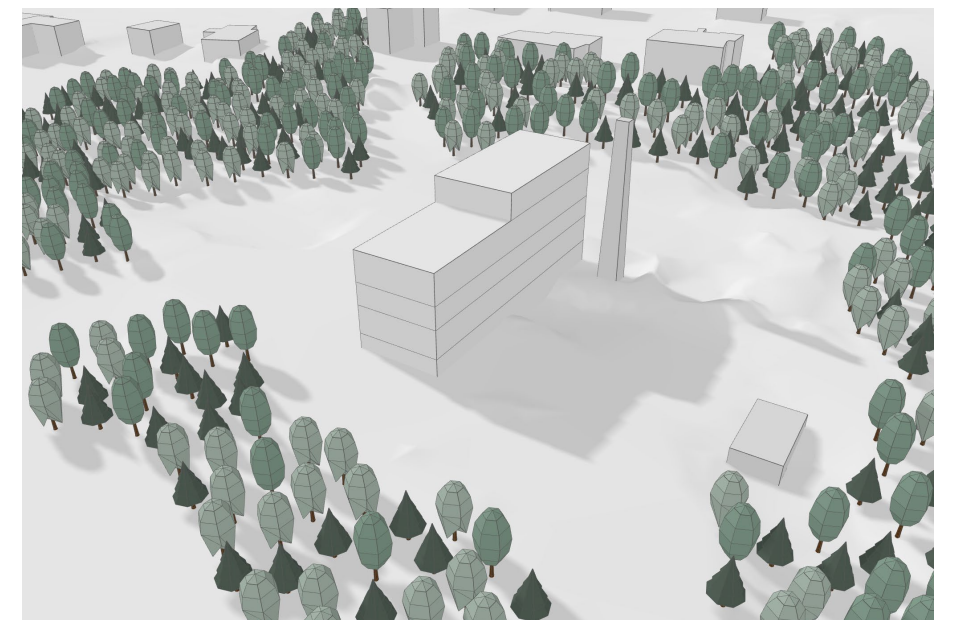
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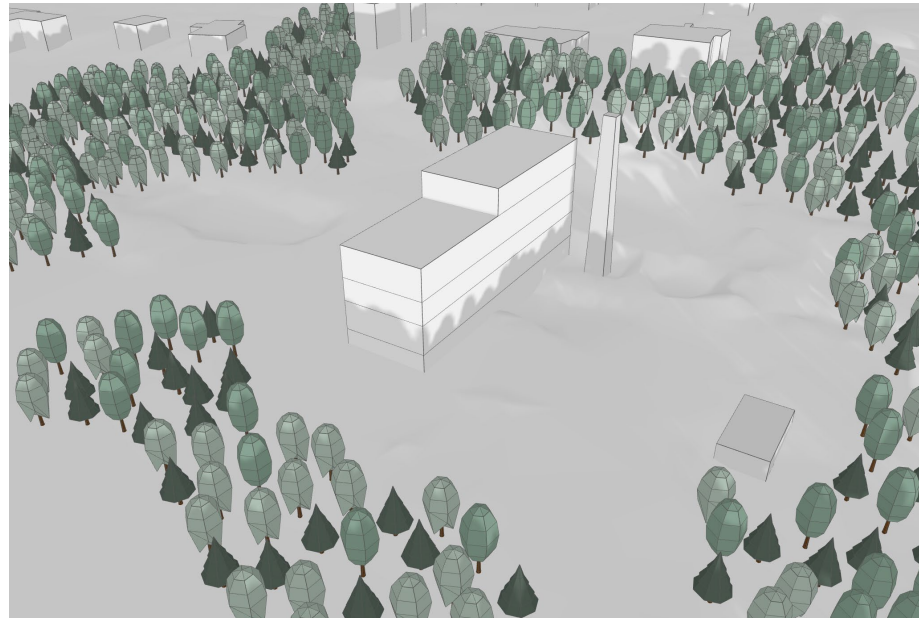
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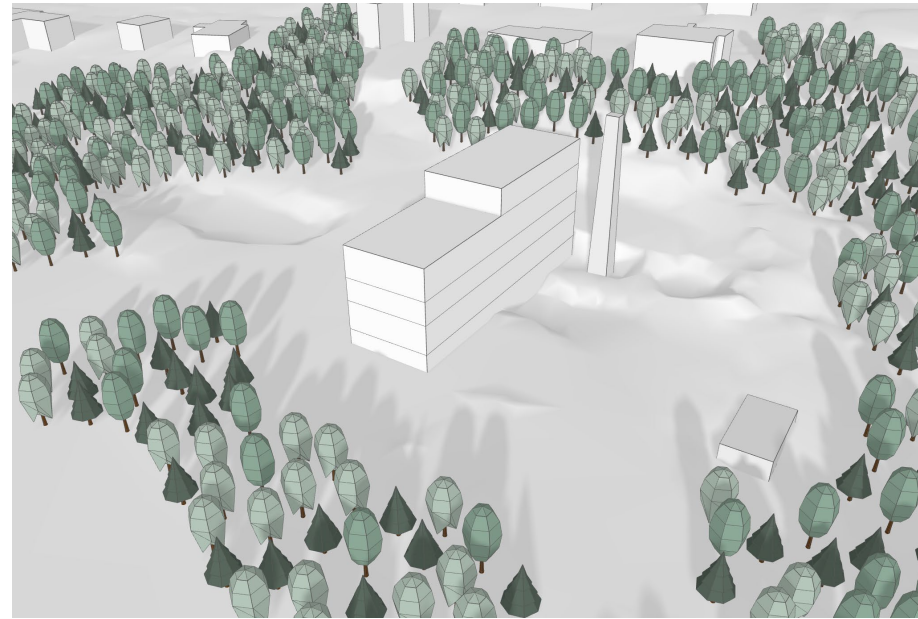
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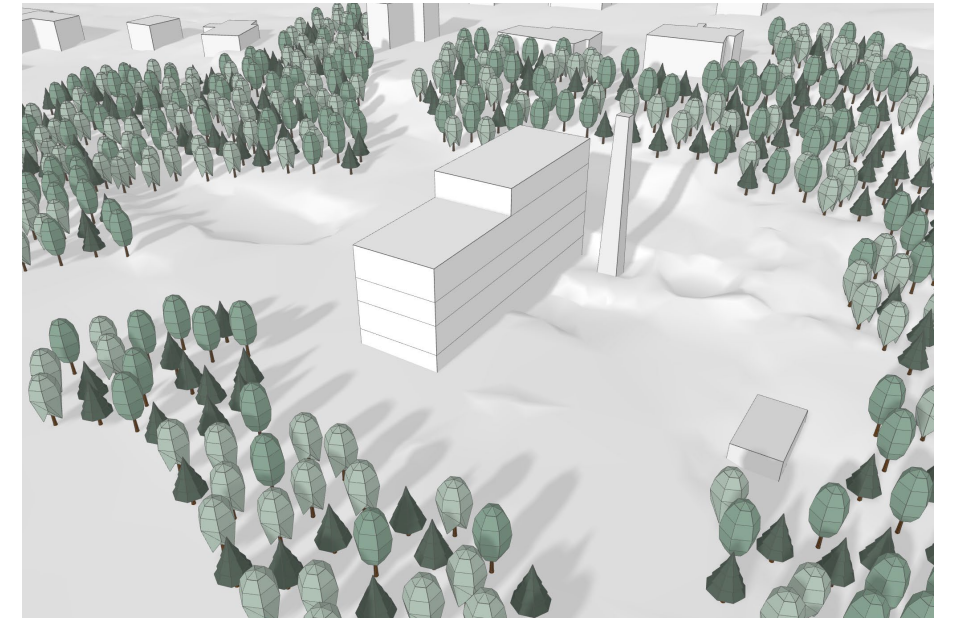
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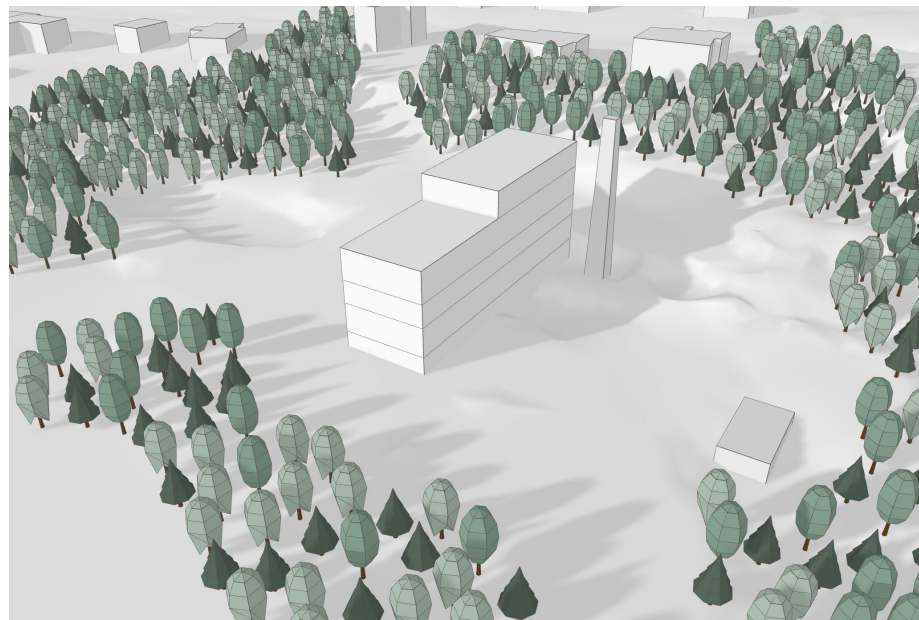
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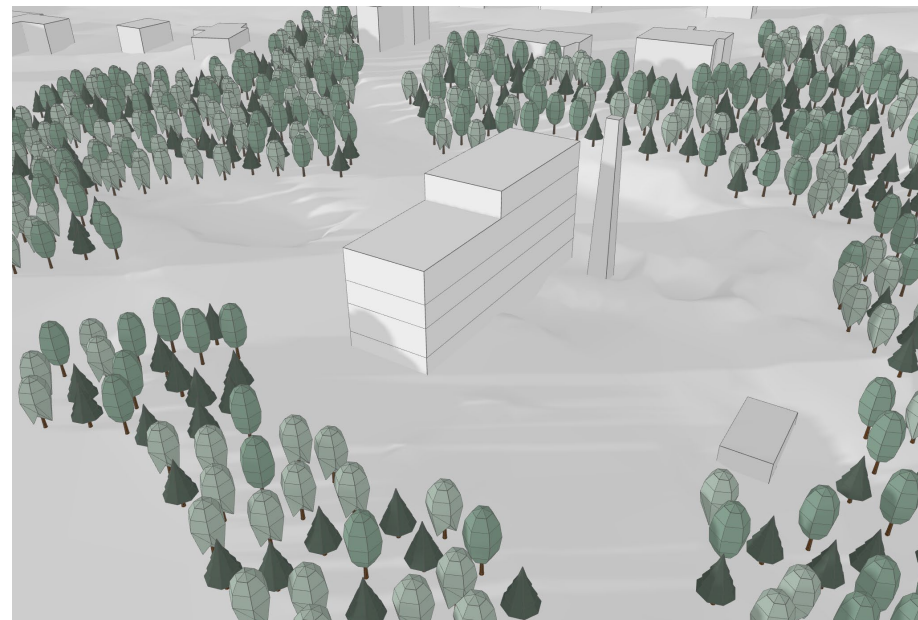
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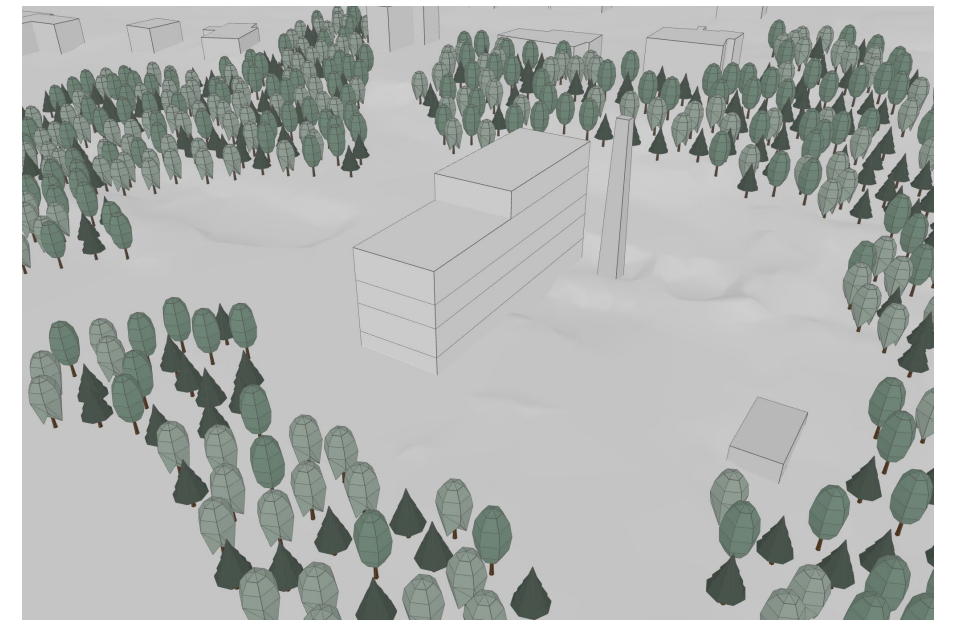
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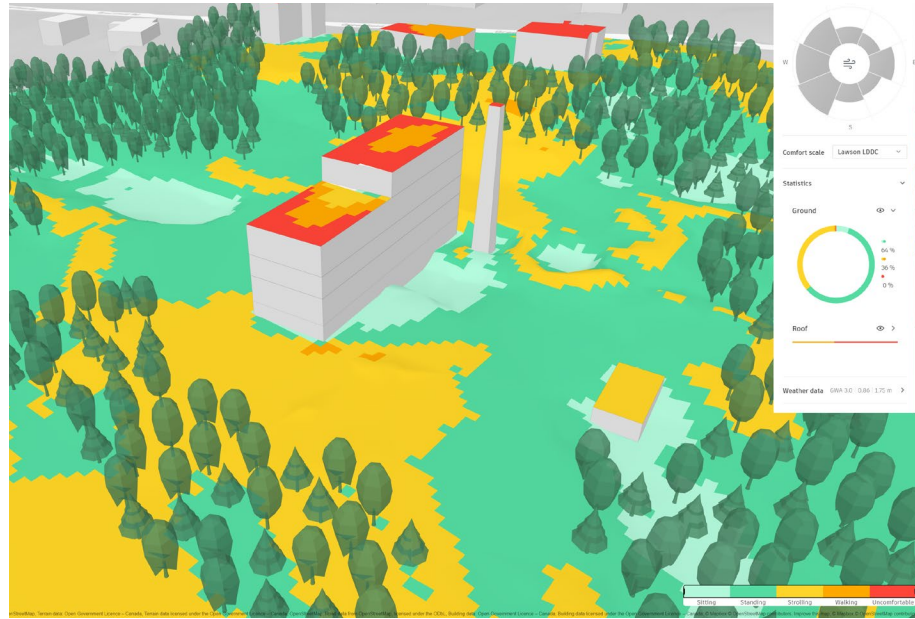
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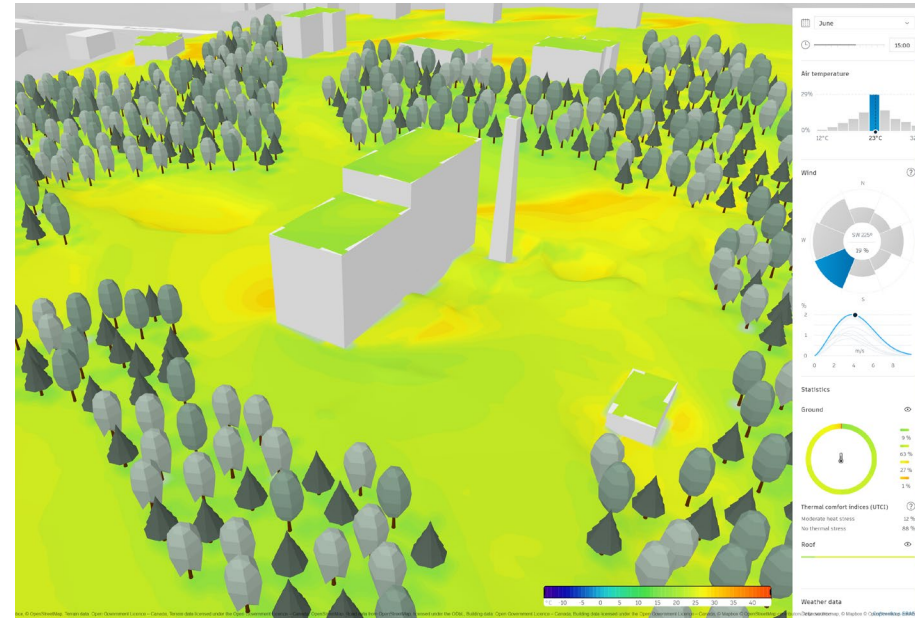
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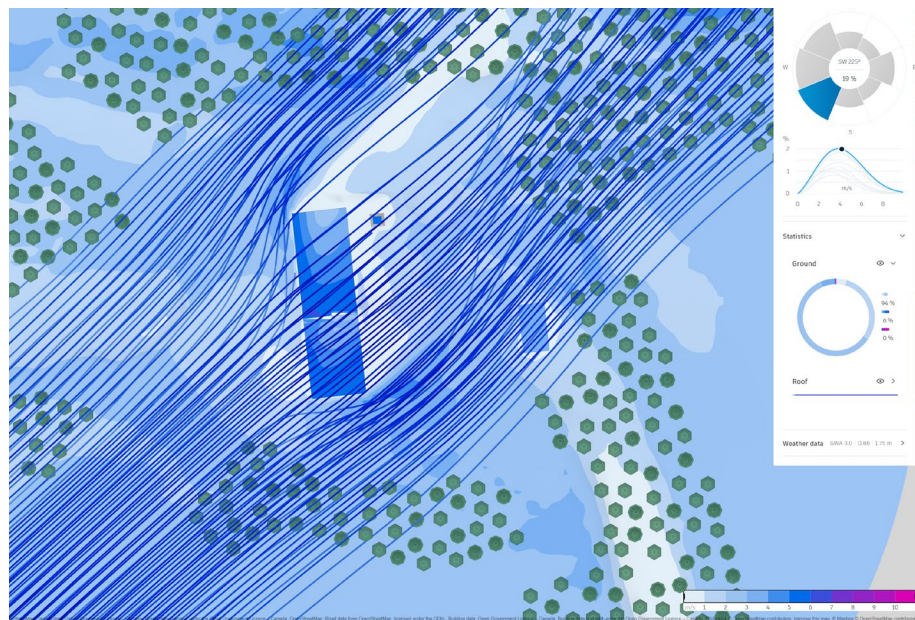
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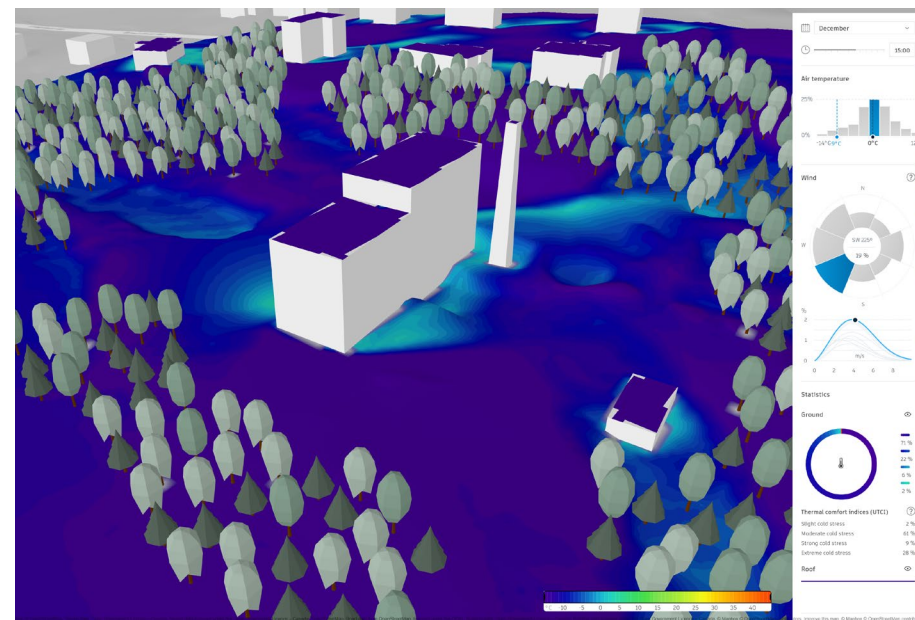
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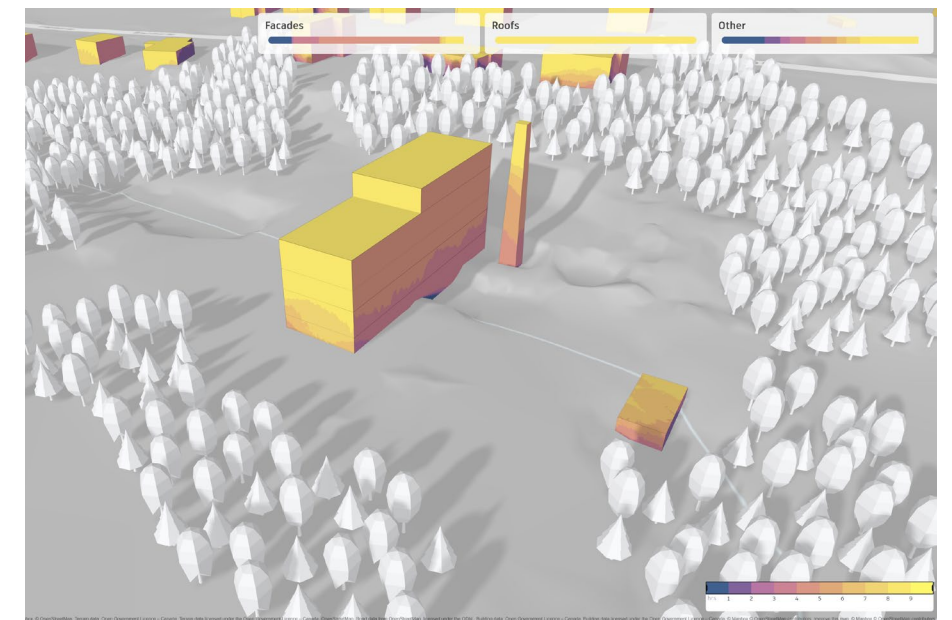
SUN HOURS - JUNE 21



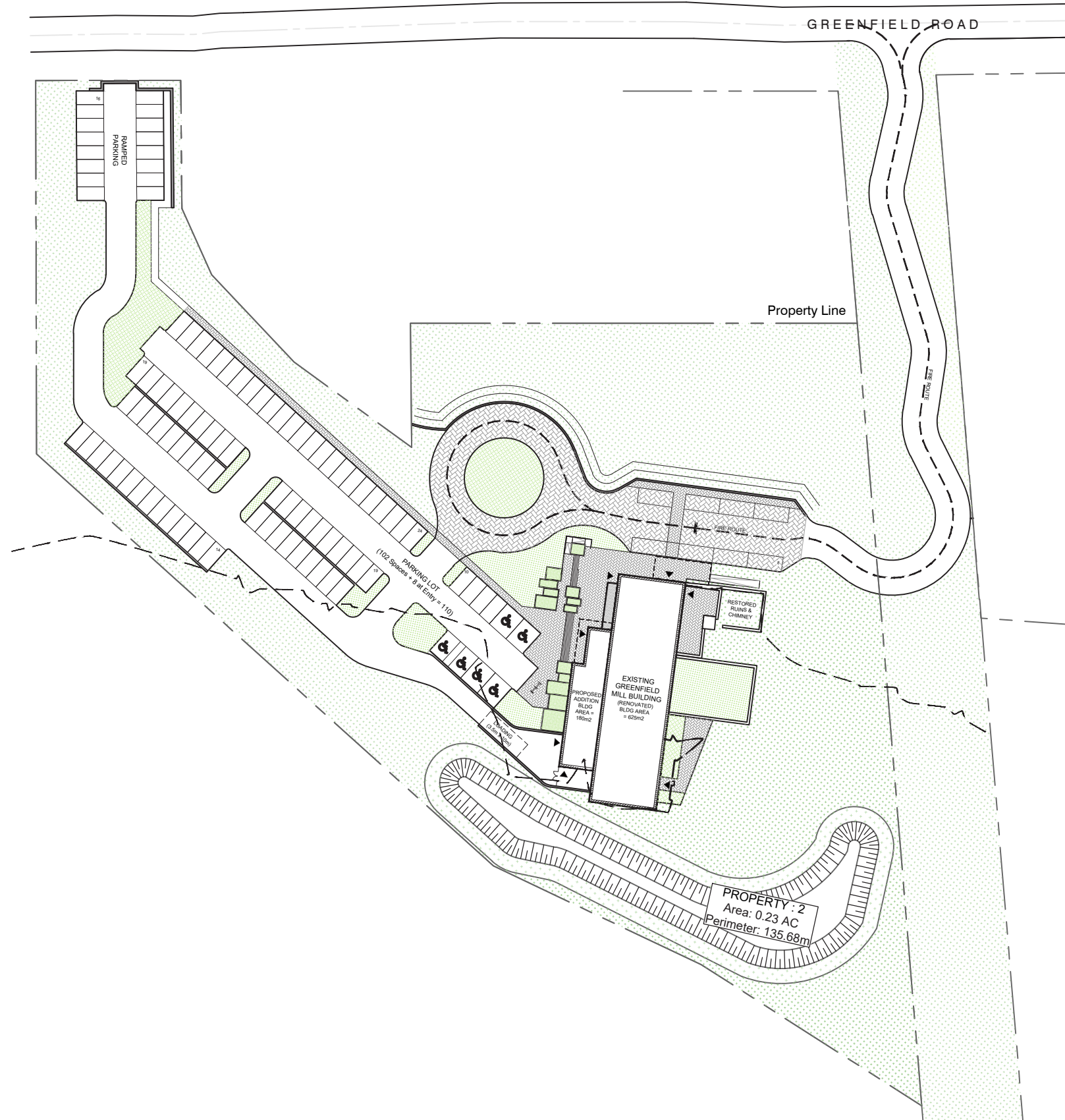
WIND DIRECTION (PREDOMINANT SW WINDS)



MICROCLIMATE - DECEMBER



SUN HOURS - DECEMBER 21



SITE DATA & ZONING PROPOSED

Township of North Dumfries
3089 Greenfield, Ayr
Proposed: Zone 7

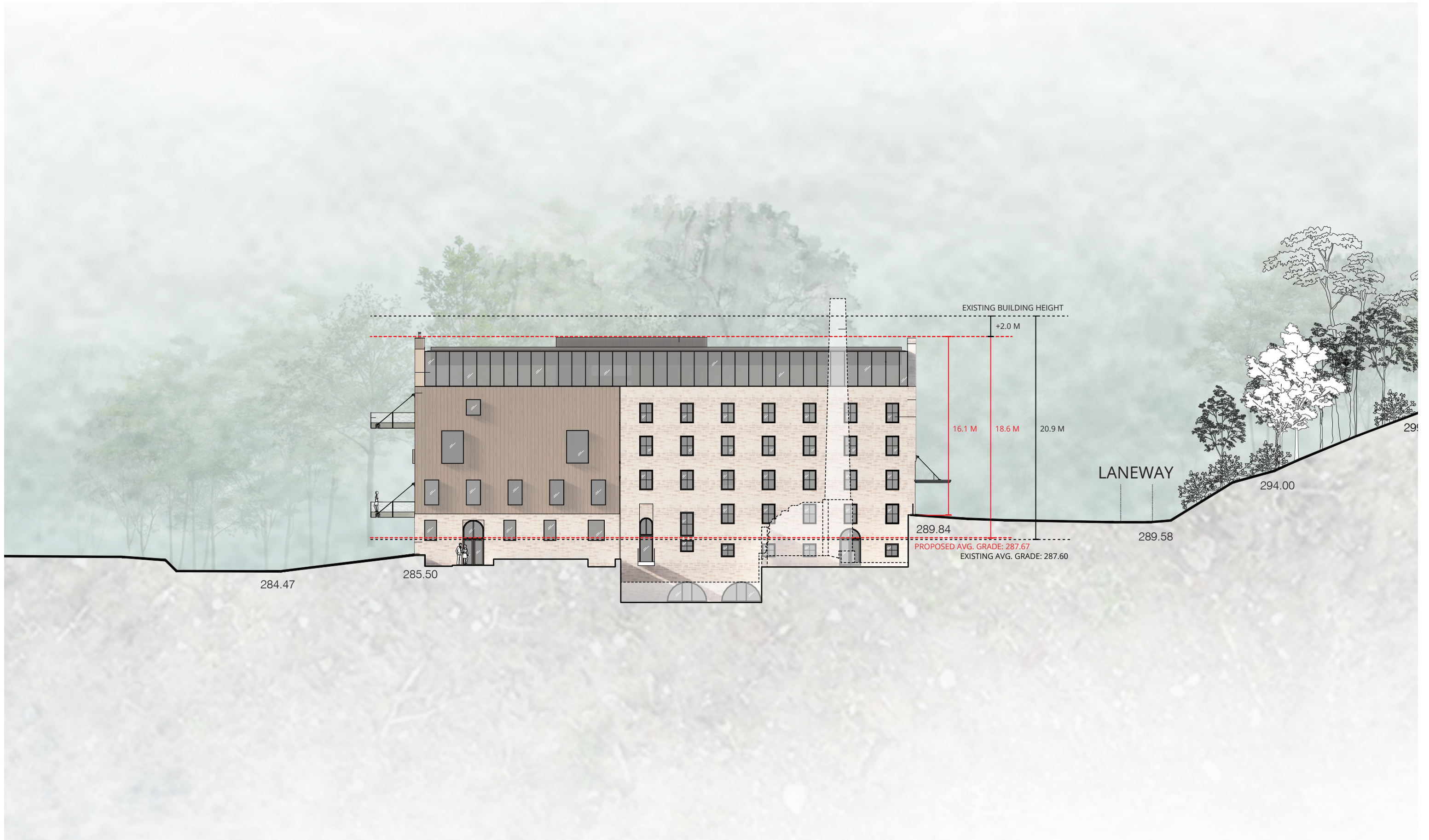
Total Site Area = 17,630 m² or 1.763 ha
Percentage of Landscape Open Space (excludes pond) = 60.4% (10,645 m²)
Total Building Area = 805m²
Total GFA = 2,251 m²

	REQUIRED	PROPOSED
Setback from Zones 2, 2a, 3, 4, 4a, 5	3.0 m of the boundary	min. 3.0 m (see below)
Buffer Strips	Required	min. 1.5 m at all side/rear yards
Minimum Lot Area	Area of the existing lot	1.763 hectares
Minimum Lot Frontage	Frontage of the existing lot	13.5 m Frontage
Maximum Building Height (at average grade)	Existing height	18.6 m
Off-Street Parking & Loading	As per zoning	110 + 1 Loading
Minimum Rear Yard	7.5 m	18 m
Enclosed Buildings Requirement	All commercial uses	Event Center & Restaurant

BUILDING SETBACKS	'Front' Yard (North)	Side Yard(s)	Rear Yard (South)
Building (Existing)	50 m	38 m (min)	19.8 m
Building (Addition)	60 m	50 m (min)	23.7 m

MINIMUM REQ'D PARKING SPACES	REQUIRED	PROVIDED
•• Surface Parking Spaces	n/a	110
•• Loading (at Rear)	1	1
•• Barrier free parking (4%)	5	6
TOTAL	n/a	110 Spaces





LEGEND

- ① EXISTING STONE
- ② EXISTING BRICK SMOKESTACK
- ③ VERTICAL WOOD SIDING
- ④ STANDING SEAM METAL CLADDING
- ⑤ CLEAR GLASS
- ⑥ METAL CANOPY
- ⑦ PERFORATED METAL BALCONY



LEGEND

- ① EXISTING STONE
- ② EXISTING BRICK SMOKESTACK
- ③ VERTICAL WOOD SIDING
- ④ STANDING SEAM METAL CLADDING
- ⑤ CLEAR GLASS
- ⑥ METAL CANOPY
- ⑦ PERFORATED METAL BALCONY



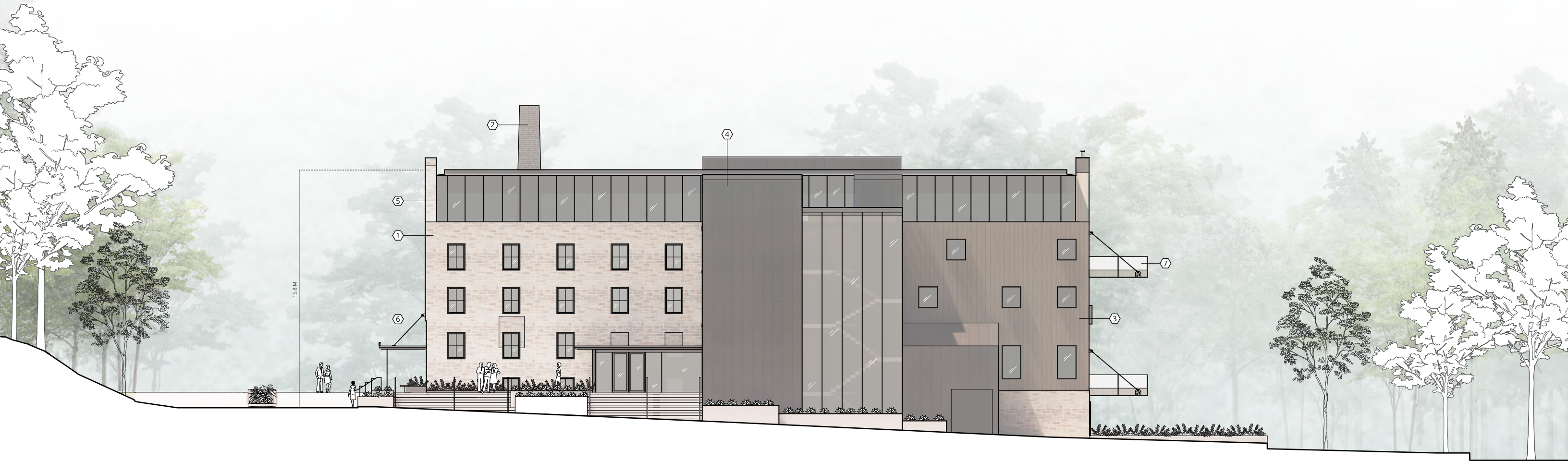
LEGEND

- ① EXISTING STONE
- ② EXISTING BRICK SMOKESTACK
- ③ VERTICAL WOOD SIDING
- ④ STANDING SEAM METAL CLADDING
- ⑤ CLEAR GLASS
- ⑥ METAL CANOPY
- ⑦ PERFORATED METAL BALCONY



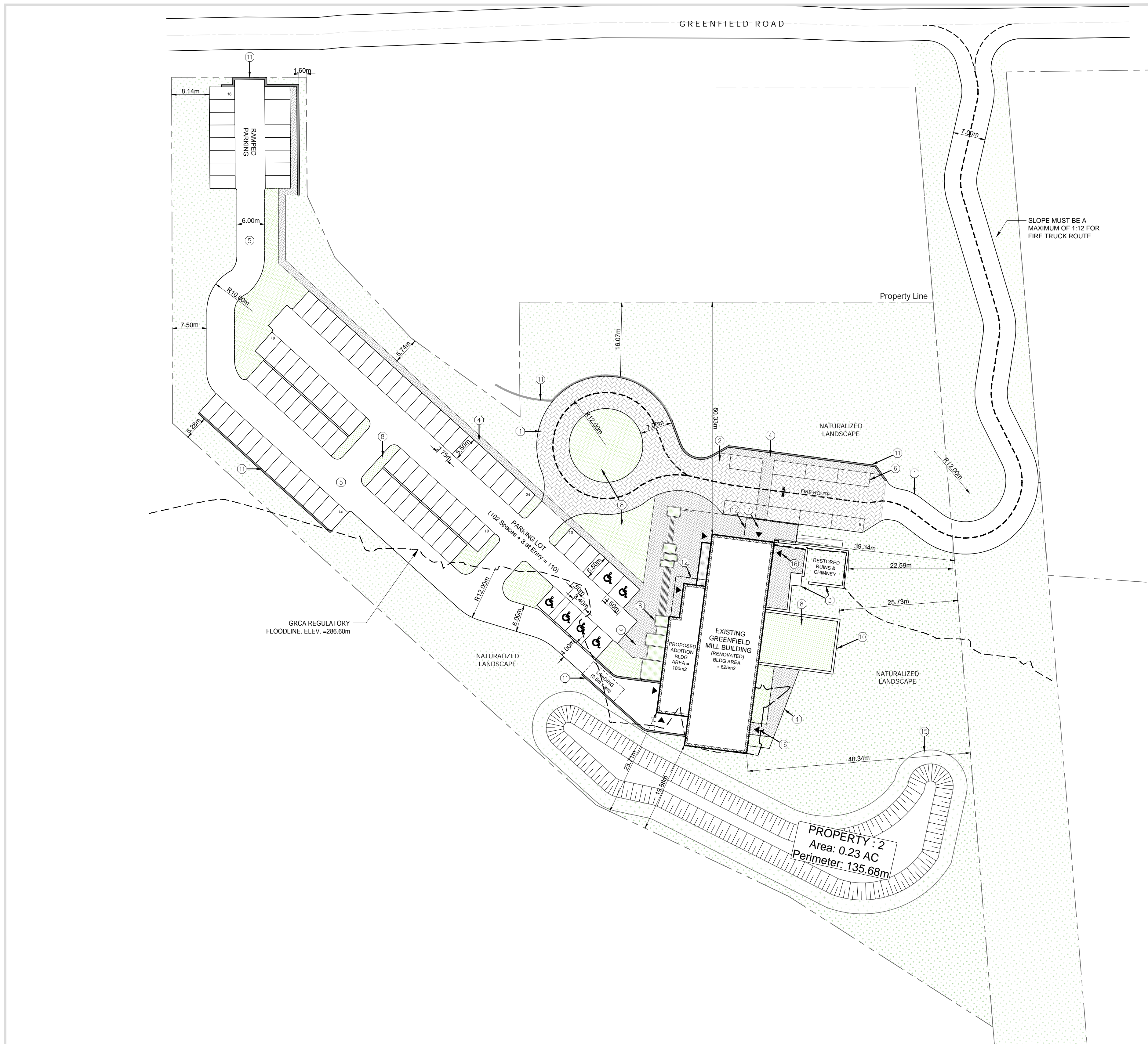
LEGEND

- ① EXISTING STONE
- ② EXISTING BRICK SMOKESTACK
- ③ VERTICAL WOOD SIDING
- ④ STANDING SEAM METAL CLADDING
- ⑤ CLEAR GLASS
- ⑥ METAL CANOPY
- ⑦ PERFORATED METAL BALCONY









SITE DATA & ZONING PROPOSED

Township of North Dumfries
 3089 Greenfield, Ayr
 Proposed: Zone 7

Total Site Area = 17,630 m² or 1.763 ha
 Total Building Area = 805m²
 Total GFA = 2,251 m²

	REQUIRED	PROPOSED
Setback from Zones 2, 2a, 3, 4, 4a, 5	3.0 m of the boundary	min 3.0 m (see below)
Buffer Strips	Required	xx ??
Minimum Lot Area	Area of the existing lot	1.763 hectares
Minimum Lot Frontage	Frontage of the existing lot	13.5 m Frontage
Maximum Building Height (Main Building)	18m (existing height)	18 m (from average grade)
Off-Street Parking & Loading	xx ??	110 + 1 Loading
Minimum Rear Yard	7.5 m	18m
Enclosed Buildings Requirement	All commercial uses	Event Center & Restaurant

BUILDING SETBACKS	Front Yard	Side Yard(s)	Rear Yard
Building (Existing)	50 m	38 m (min)	19.8 m
Building (Addition)	60 m	50 m (min)	23.7m

MINIMUM REQ'D PARKING SPACES	REQUIRED	PROVIDED
Surface Parking Spaces	n/a	110
Loading (at Rear)	1	1
Barrier free parking (4%)	5	6
TOTAL	n/a	110 Spaces

SITE PLAN NOTES

- ① CURB - LANDSCAPE DRAWING T.B.D.
- ② VEHICULAR HEAVY DUTY UNIT PAVING (LANDSCAPE DWGS T.B.D.)
- ③ RESTORED STONE RUIN WALLS, BRICK CHIMNEY
- ④ PEDESTRIAN UNIT PAVING (LANDSCAPE DWGS T.B.D.)
- ⑤ ASPHALT PAVING
- ⑥ DROP-OFF AND TEMPORARY PARKING
- ⑦ MAIN ENTRY, FIRE DEPARTMENT ENTRY & CONNECTION
- ⑧ PLANTING BED/LANDSCAPED AREA - REFER TO LANDSCAPE DRAWINGS
- ⑨ BIKE RACK AREA
- ⑩ NEW RETAINING WALL TO REPLACE EXISTING
- ⑪ CONCRETE RETAINING WALL - REFER TO ARCHITECTURAL DRAWINGS
- ⑫ LINE OF CANOPY
- ⑬ BARRIER FREE FLUSH CURB - PROVIDE TACTILE WARNING STRIPS AT CROSSWALKS. (REFER TO CIVIL DWGS. T.B.D.)
- ⑭ GAS METER - T.B.D.
- ⑮ STORM WATER POND (REFER TO CIVIL DWGS)
- ⑯ RESTORED EXISTING OPENING

SITE LEGEND:

- PROPERTY LINE
- ▼ BUILDING EXIT
- BF - BARRIER FREE
- FF - FIRE FIGHTER
- PRINCIPAL ENTRANCE
- DENOTES FIRE ROUTE
- MIN. 6.0m WIDE WITH MIN. 12.0m CENTRELINE RADIUS
- BARRIER FREE PARKING
- ▨ PERMEABLE PAVERS (TYPE 1)
- ▩ PERMEABLE PAVERS (TYPE 2)

№	DATE	ISSUE
	29/05/2026	ISSUED ZPA/OPA

**MARTIN
 SIMMONS
 SWEERS**

200 - 113 Breithaupt Street
 Kitchener, ON N2H 5G9
 t 519.745.4754 f 519.745.0061

DO NOT SCALE THESE DRAWINGS. THE CONTRACTOR SHALL VERIFY DIMENSIONS AND REPORT ANY ERRORS AND / OR OMISSIONS TO ARCHITECT / CONSULTANT BEFORE COMMENCING THE WORK. THESE DRAWINGS ARE THE PROPERTY OF THE ARCHITECT / CONSULTANT AND ARE NOT TO BE DUPLICATED OR DISTRIBUTED WITHOUT CONSENT OF ARCHITECT / CONSULTANT.

**PROJECT
 GREENFIELD MILL**

3080 Greenfield Road, Ayr, Ontario

DRAWING

**CONCEPTUAL
 SITE PLAN**

DRAWN BY _____ CHECKED BY _____

KS

DATE _____

SCALE _____ DRAWING 1

1:500
 PROJECT № _____

A1

APPENDIX B: EXISTING DRAWINGS & PHOTOGRAPHS

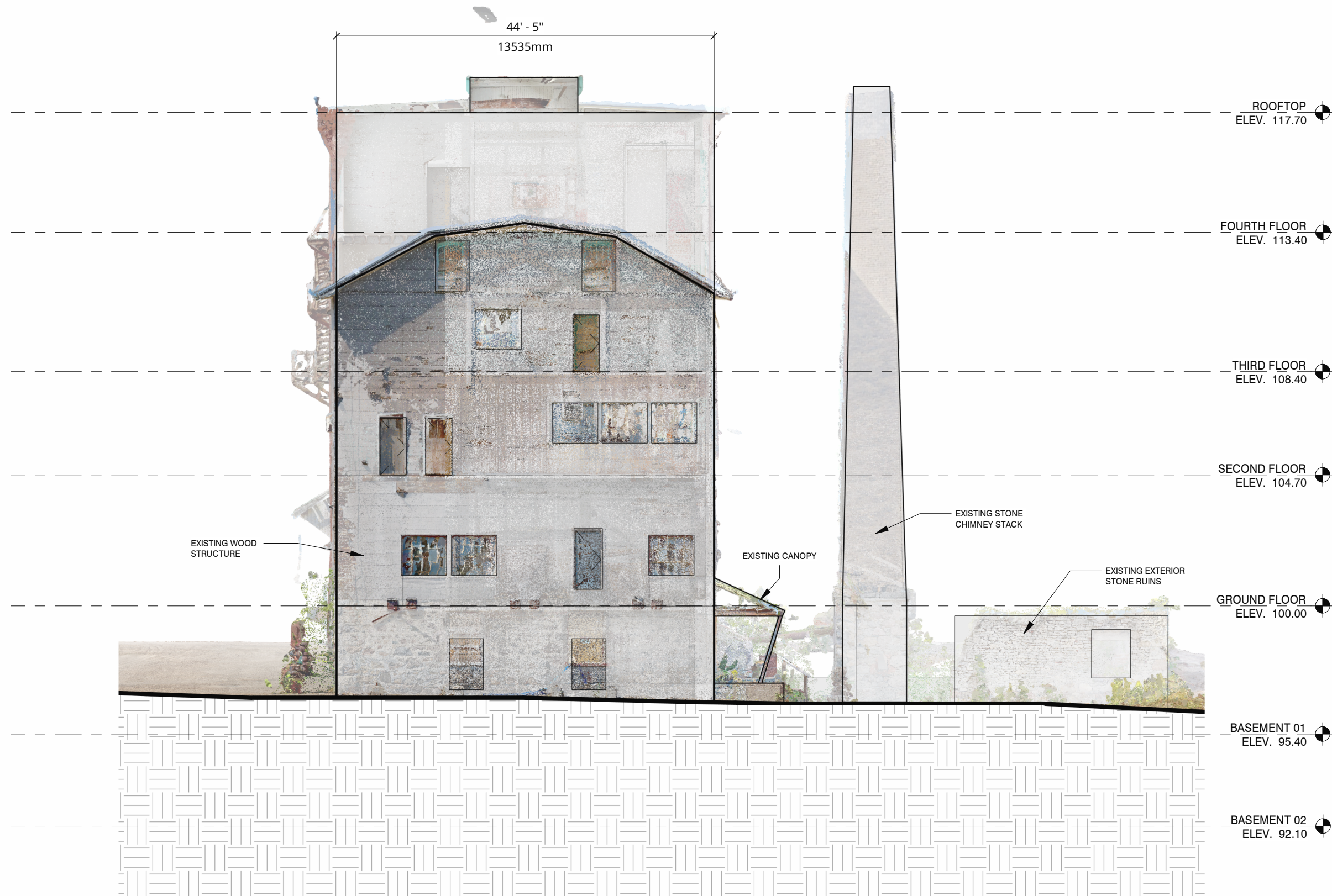
3089 Greenfield Road, Ayr
EXISTING EAST ELEVATION

1 : 150



3089 Greenfield Road, Ayr
EXISTING SOUTH ELEVATION

1 : 150



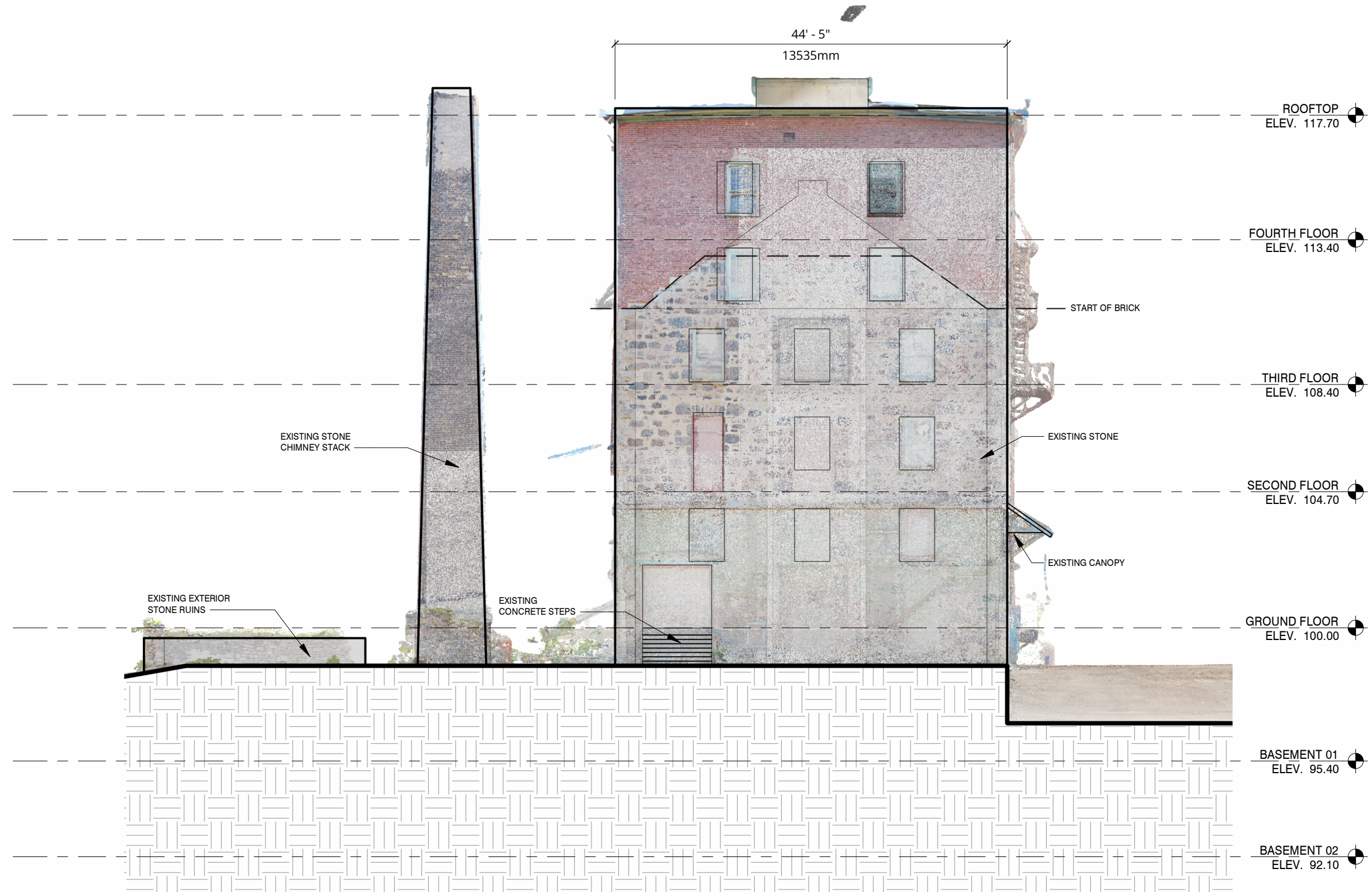
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EXISTING WEST ELEVATION

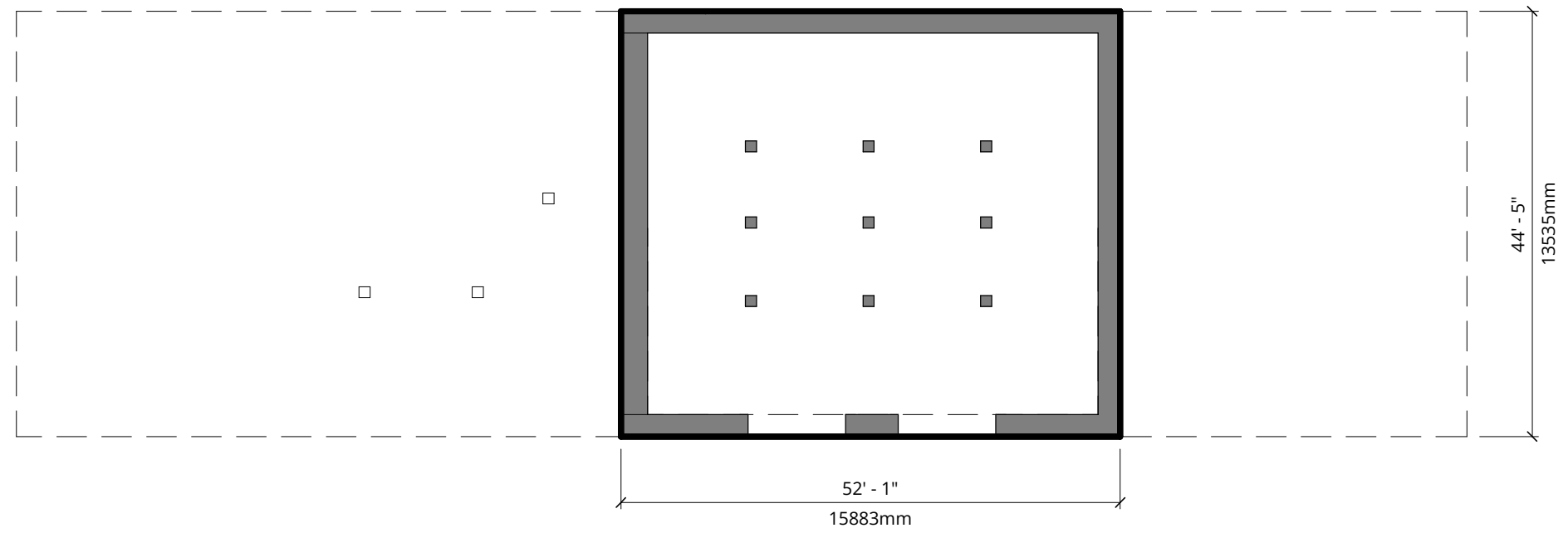
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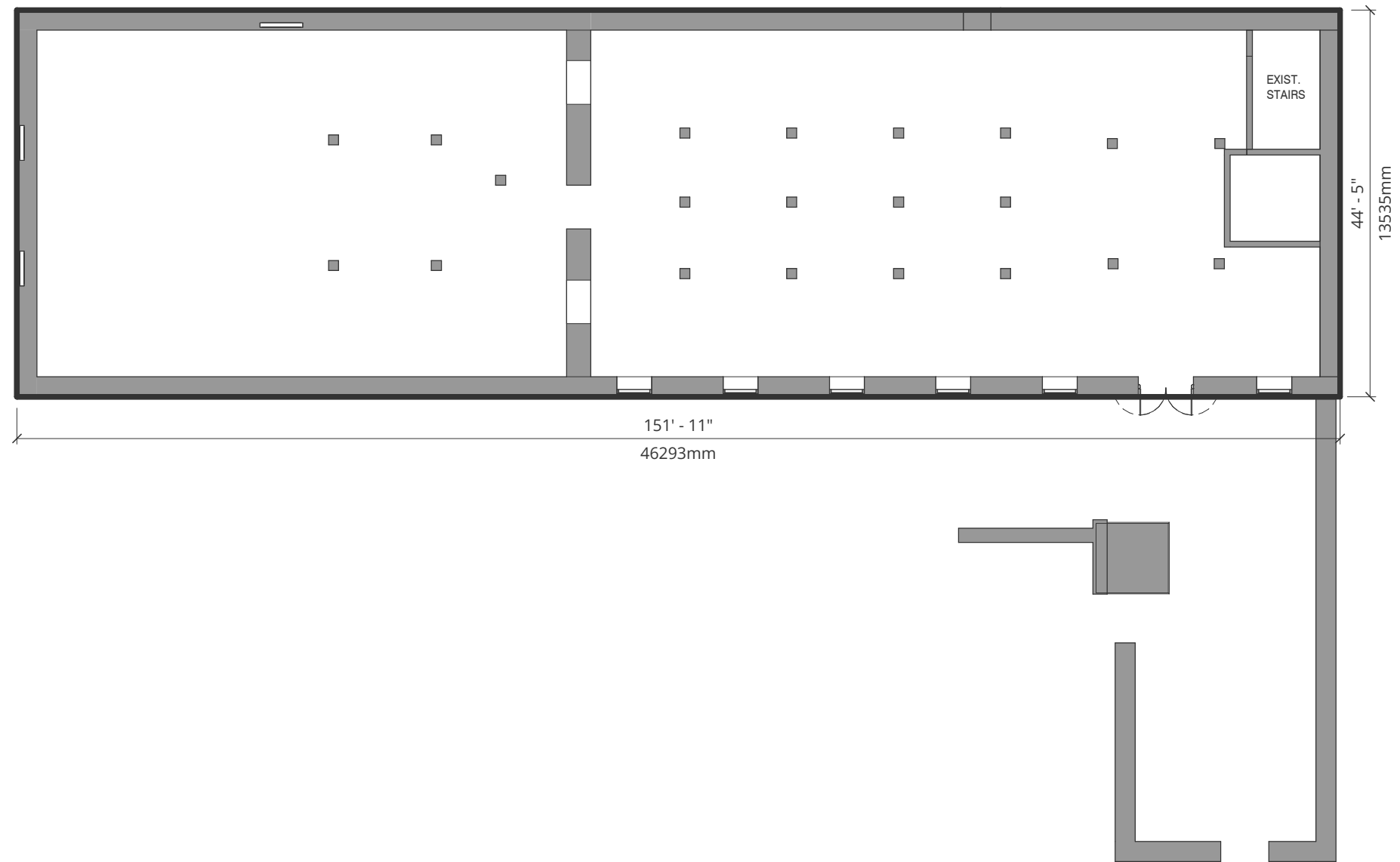


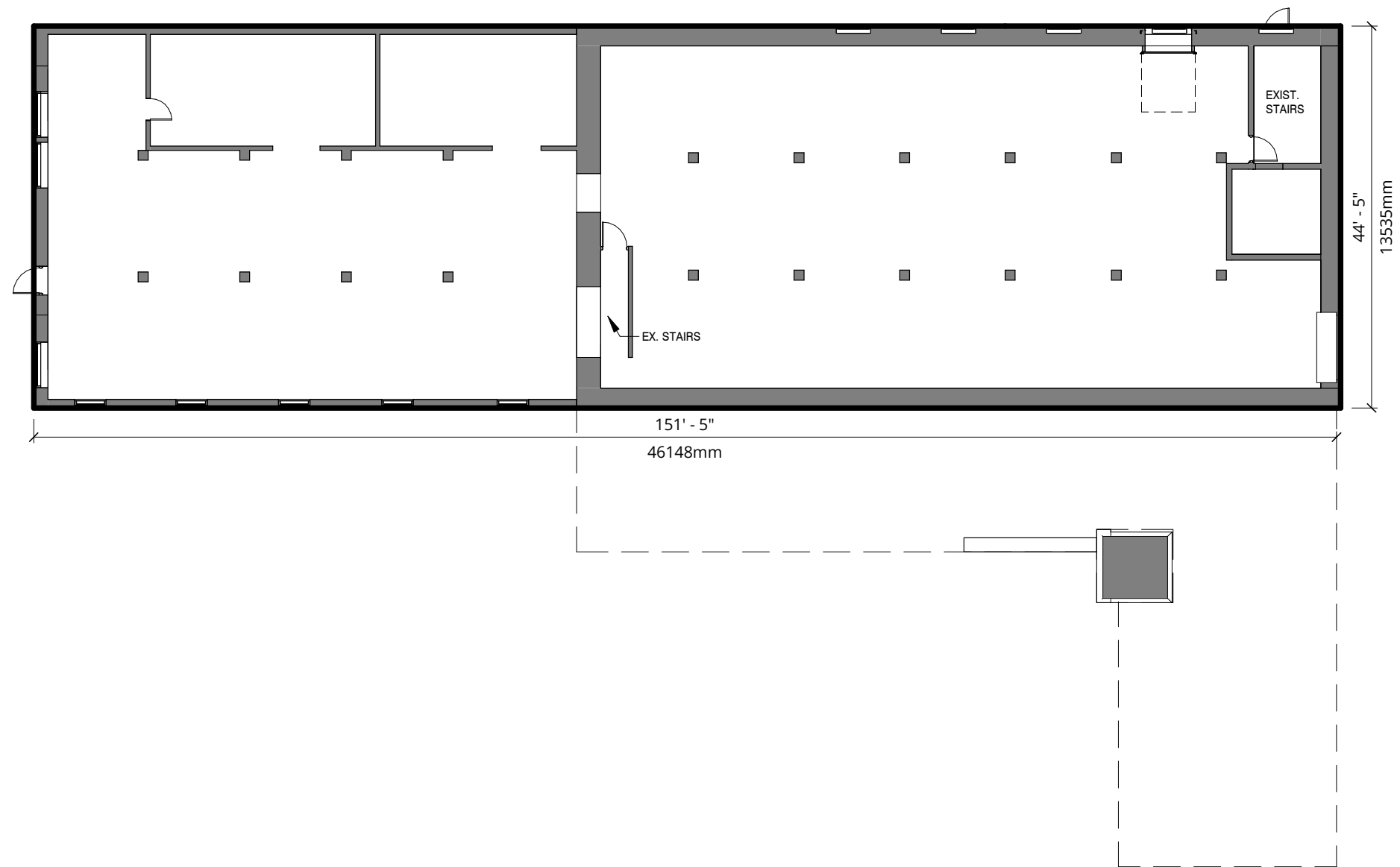
3089 Greenfield Road, Ayr
EXISTING NORTH ELEVATION

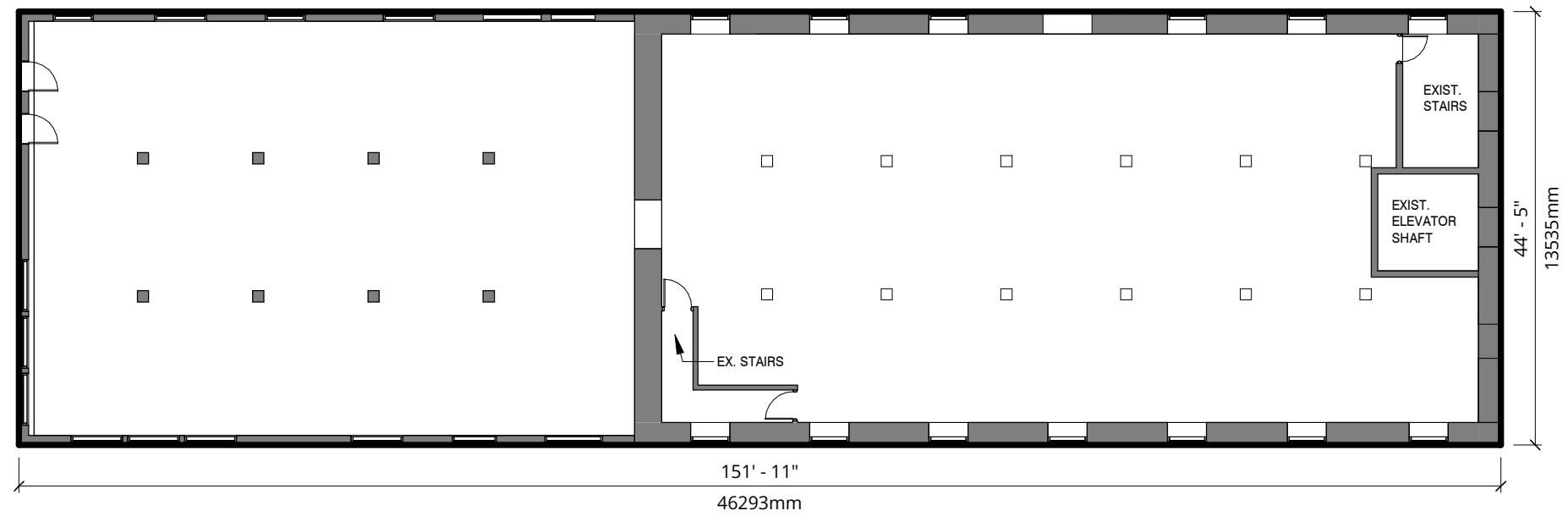
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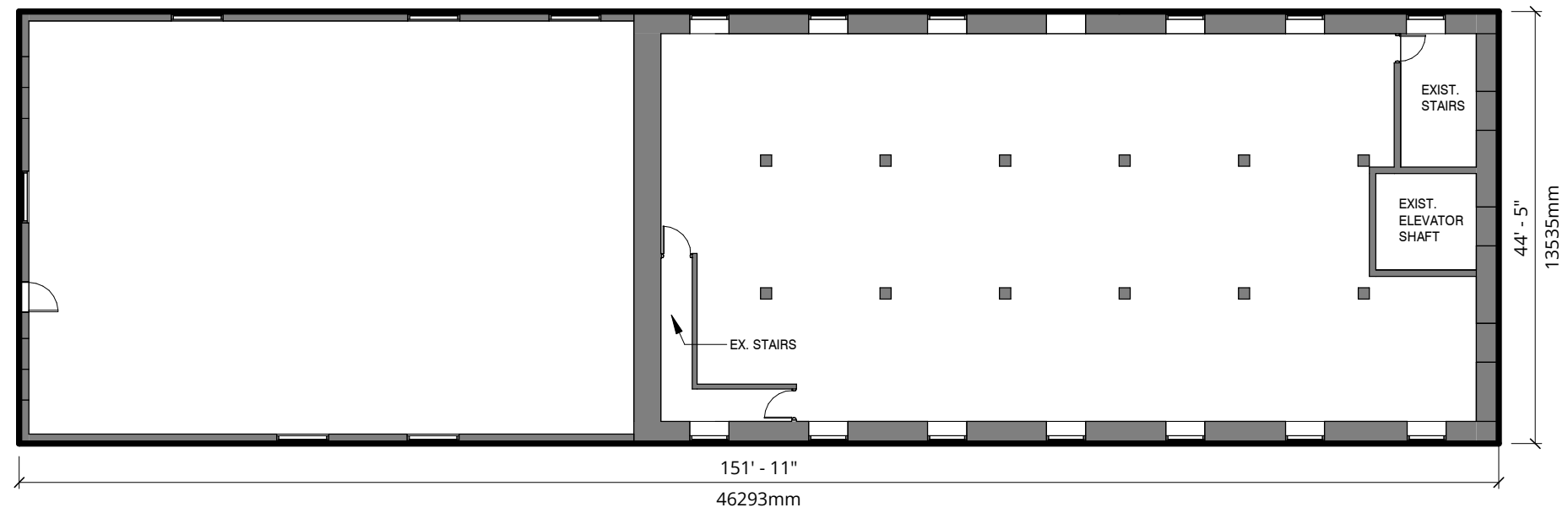


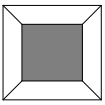
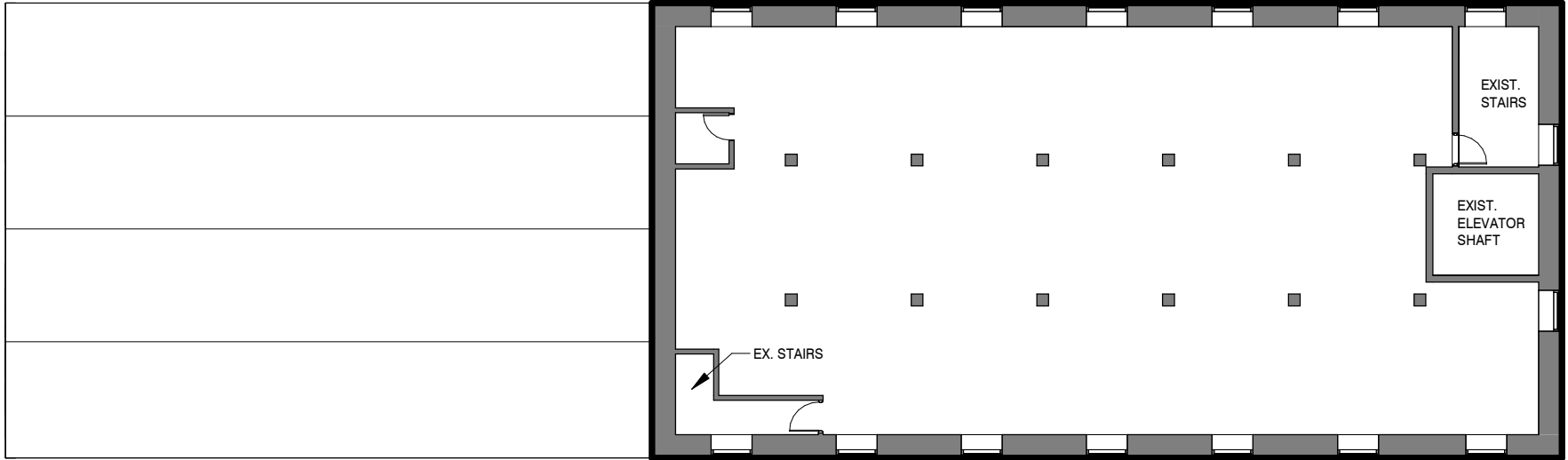


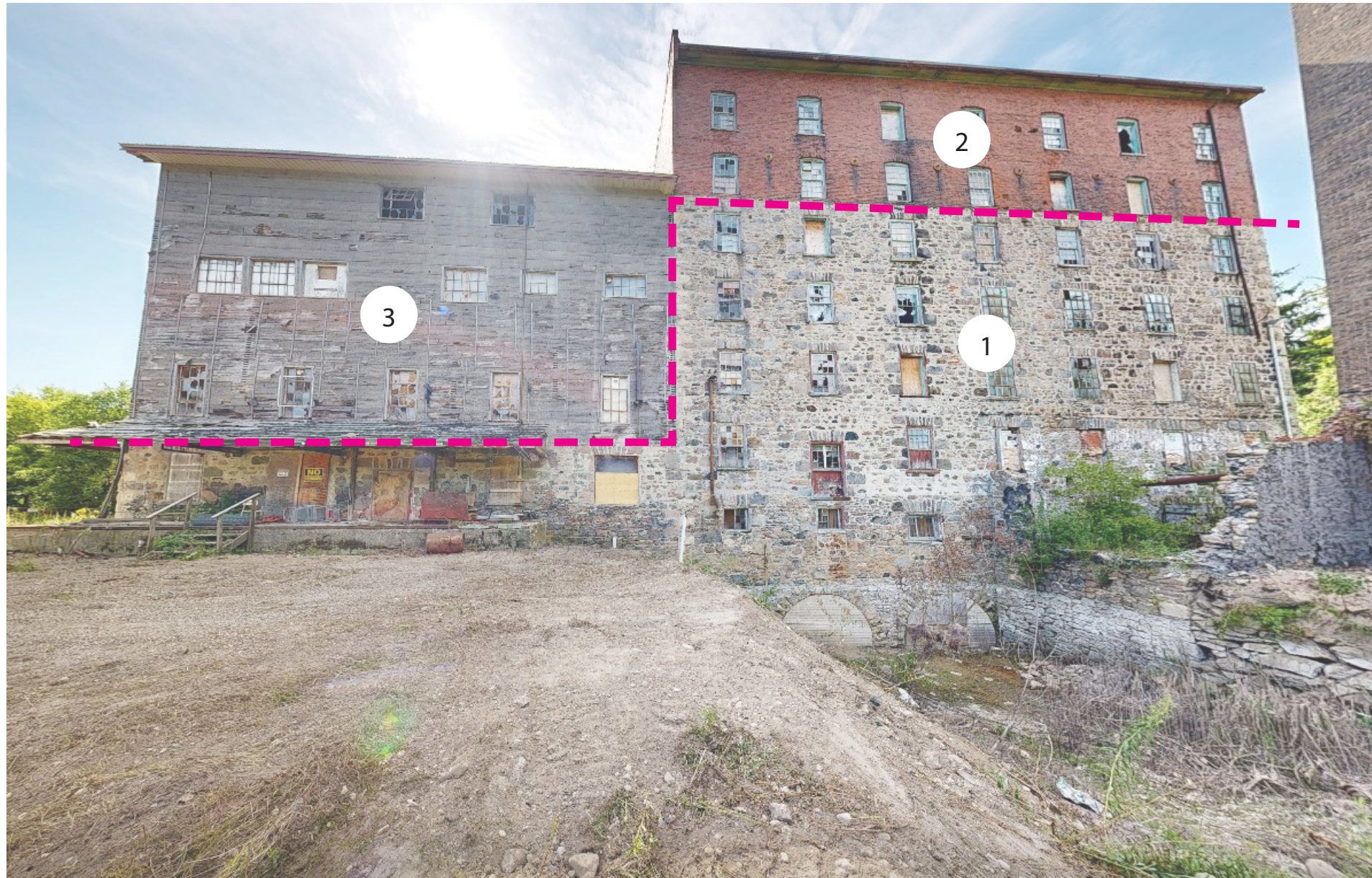












General Note:

- Maintain and restore all existing and infilled openings where possible;
Replace with new window/door suites.

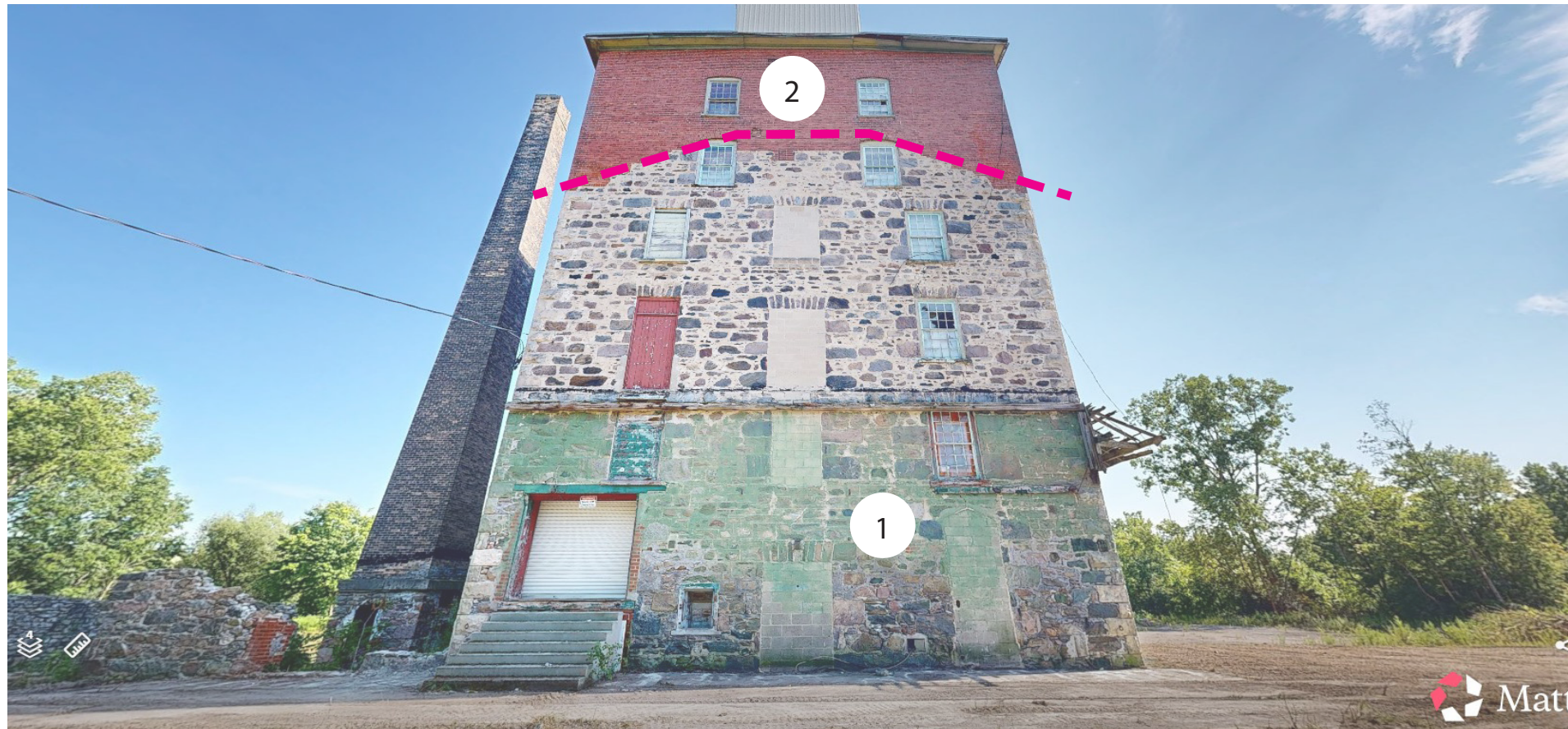
1. Retain and restore all existing stone on building faces.

2. Remove upper storey and a half, at line of brick facades.

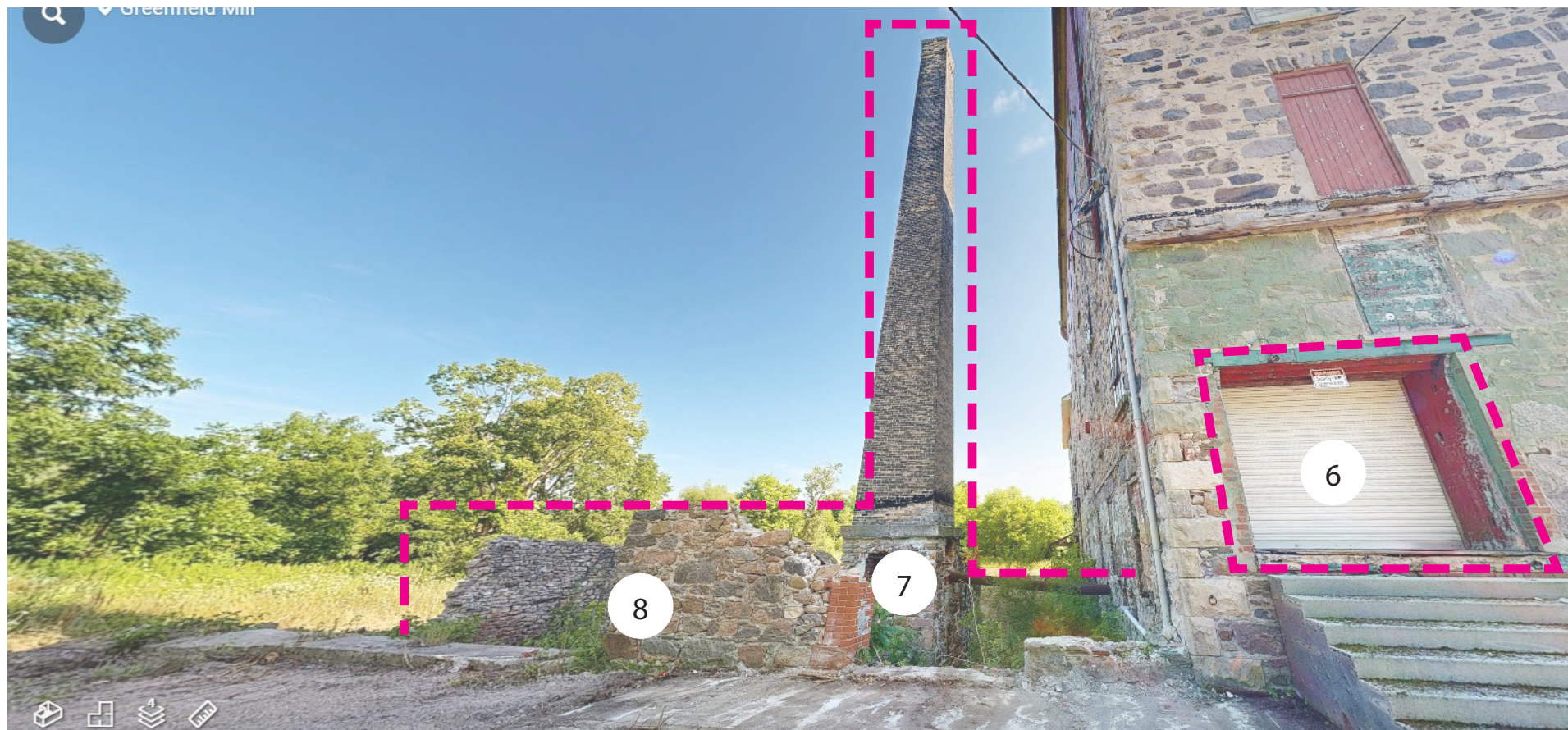
3. Remove Wood Addition (nail lam timber structure); Maintain best
condition sections for reuse.

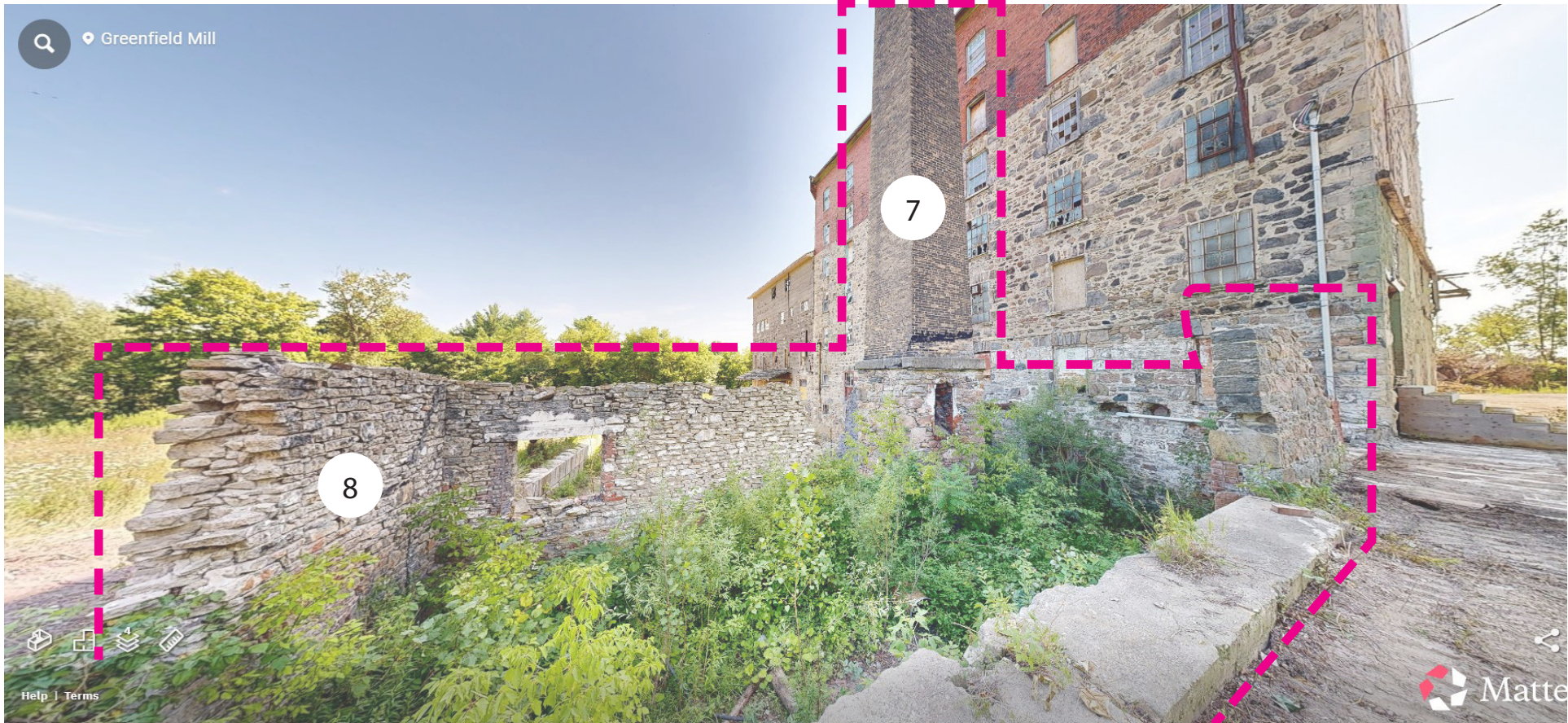


1. Retain and restore all existing stone on building faces.
2. Remove upper storey and a half, at line of brick facades.
3. Remove Wood Addition (nail lam timber structure); Maintain best condition sections for reuse.
4. Remove existing fire escape.
5. Remove existing canopy,



1. Retain and restore all existing stone on building faces.
2. Remove upper storey and a half, at line of brick facades.
6. Maintain existing opening for new main lobby entrance, remove existing stair; new stair/ramp will consider a raise of grade at entry.
7. Maintain and restore existing brick and stone Chimney stack.
8. Maintain and restore existing exterior stone ruins; Design intent is to restore these areas as a landscape feature. Stone repair needed to ensure stability/safety. If a section is deemed to be unstable for restoration it can be removed or partially rebuilt.

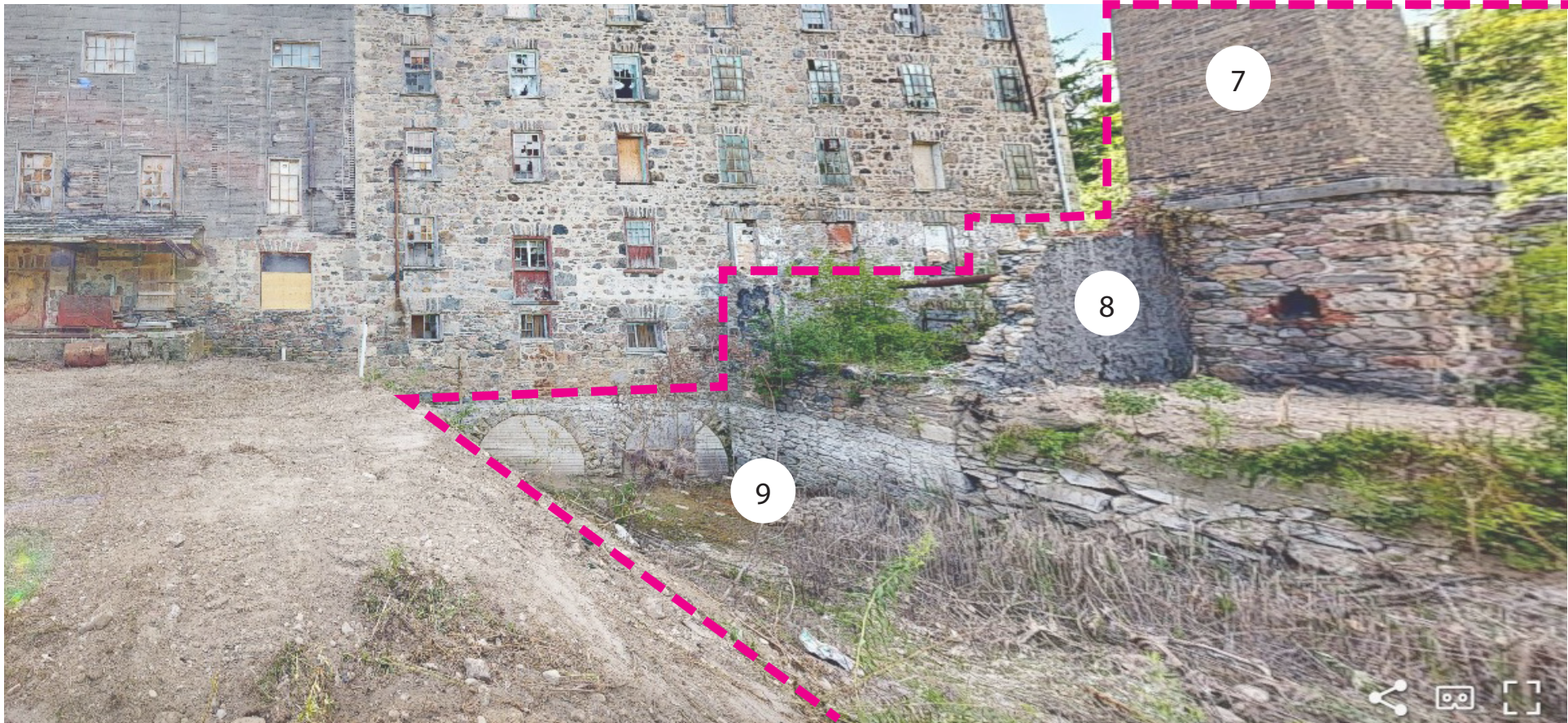


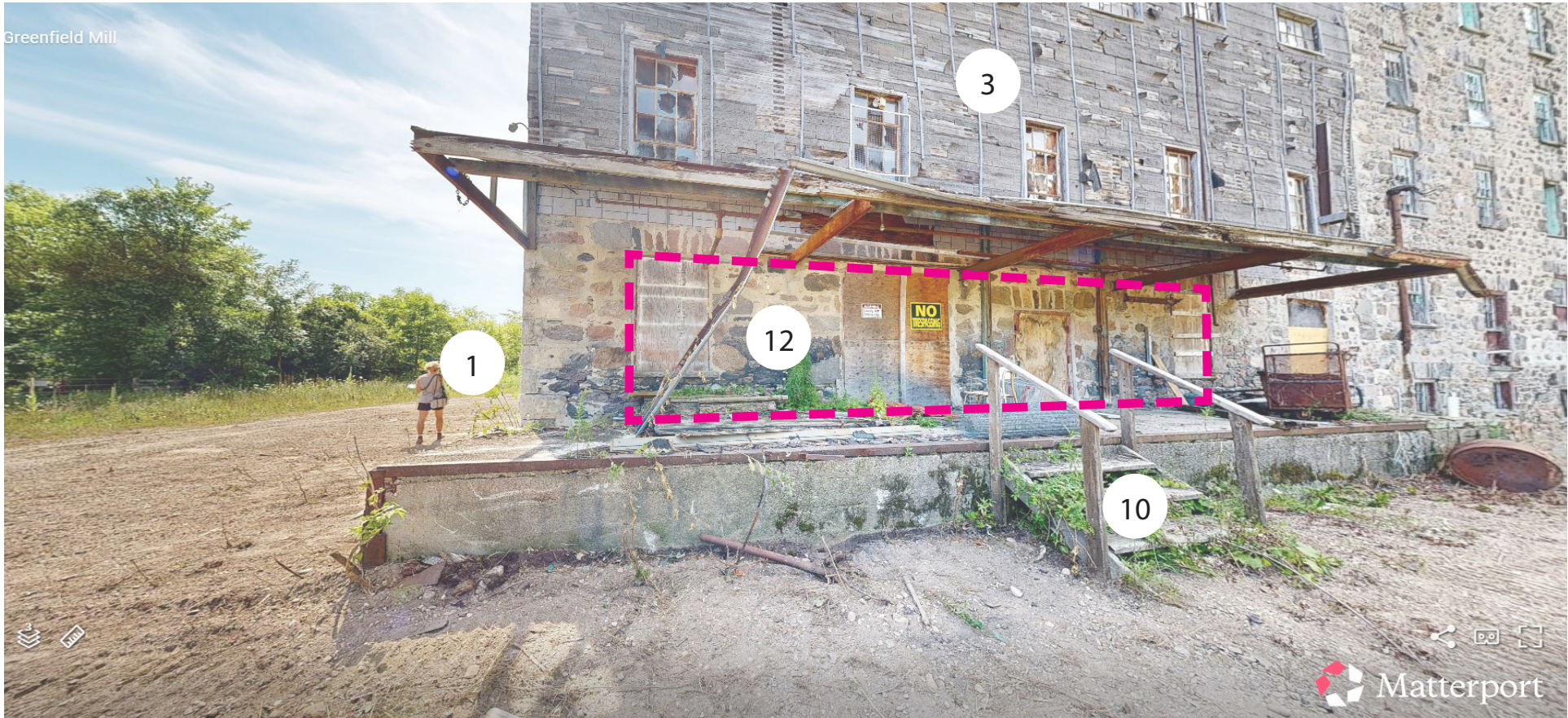


7. Maintain and restore existing brick and stone Chimney stack.

8. Maintain and restore existing exterior stone ruins; Design intent is to restore these areas as a landscape feature. Stone repair needed to ensure stability/safety. If a section is deemed to unstable for restoration it can be removed or partially rebuilt.

9. Consider feasibility of opening up existing Archways from future Groom's Suite/Cellar space; This lower grade area can be incorporated into a landscape and water feature and will likely require new retaining walls.





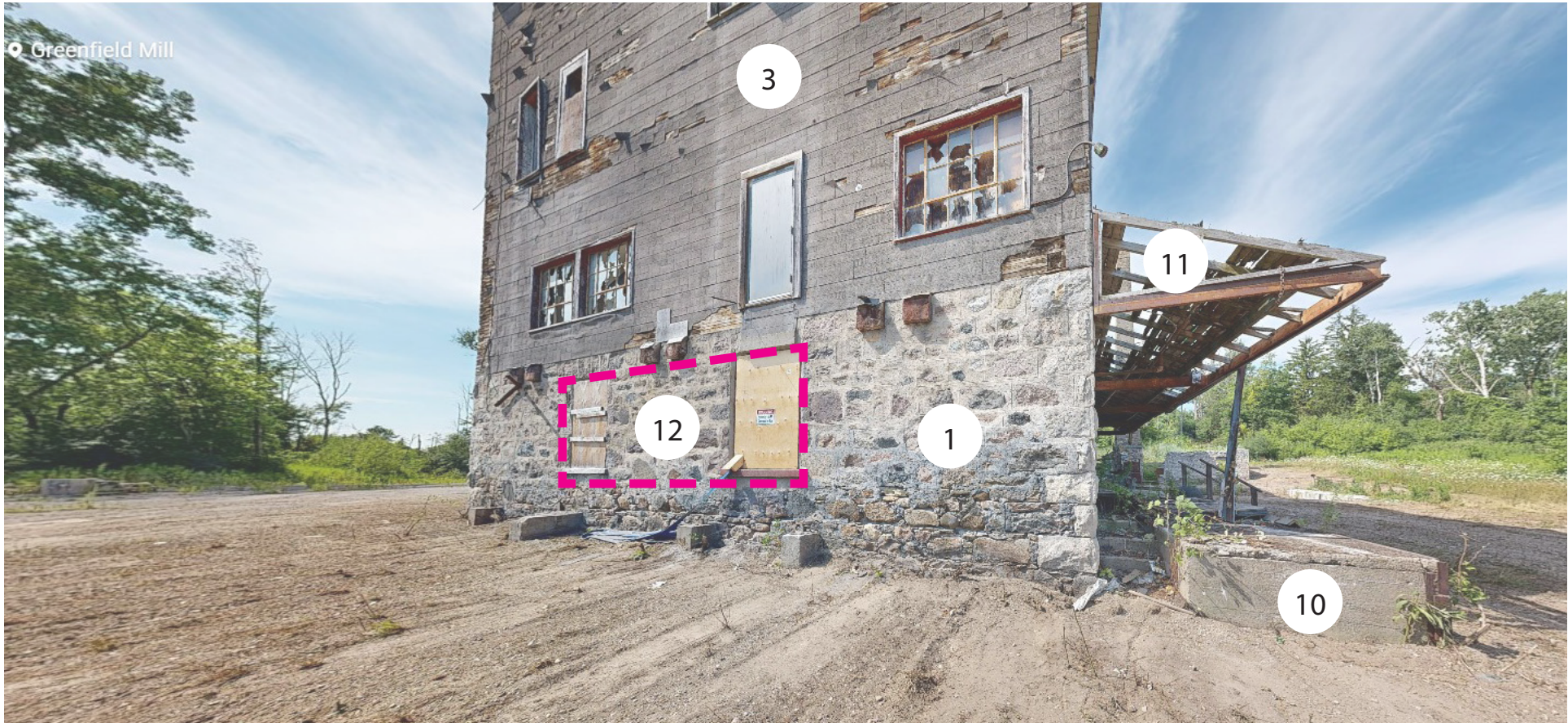
1. Retain and restore all existing stone on building faces.

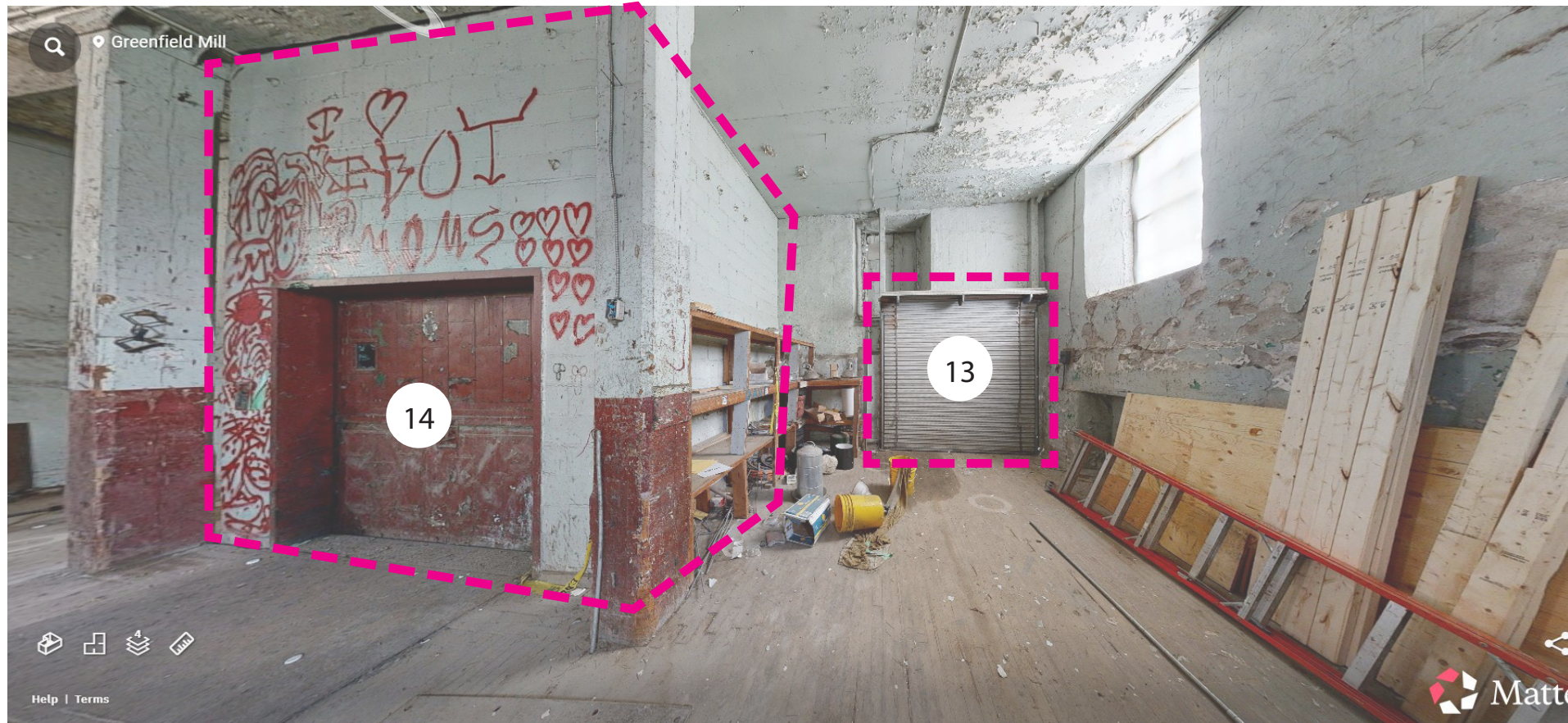
3. Remove Wood Addition (nail lam timber structure); Maintain best condition sections for reuse.

10. Remove existing concrete platform and stair.

11. Remove existing wood canopy framing.

12. Re-open these existing windows (This space currently slated to become the indoor Ceremony space); inside floor elevation will be lowered with exact elevation still t.b.d.



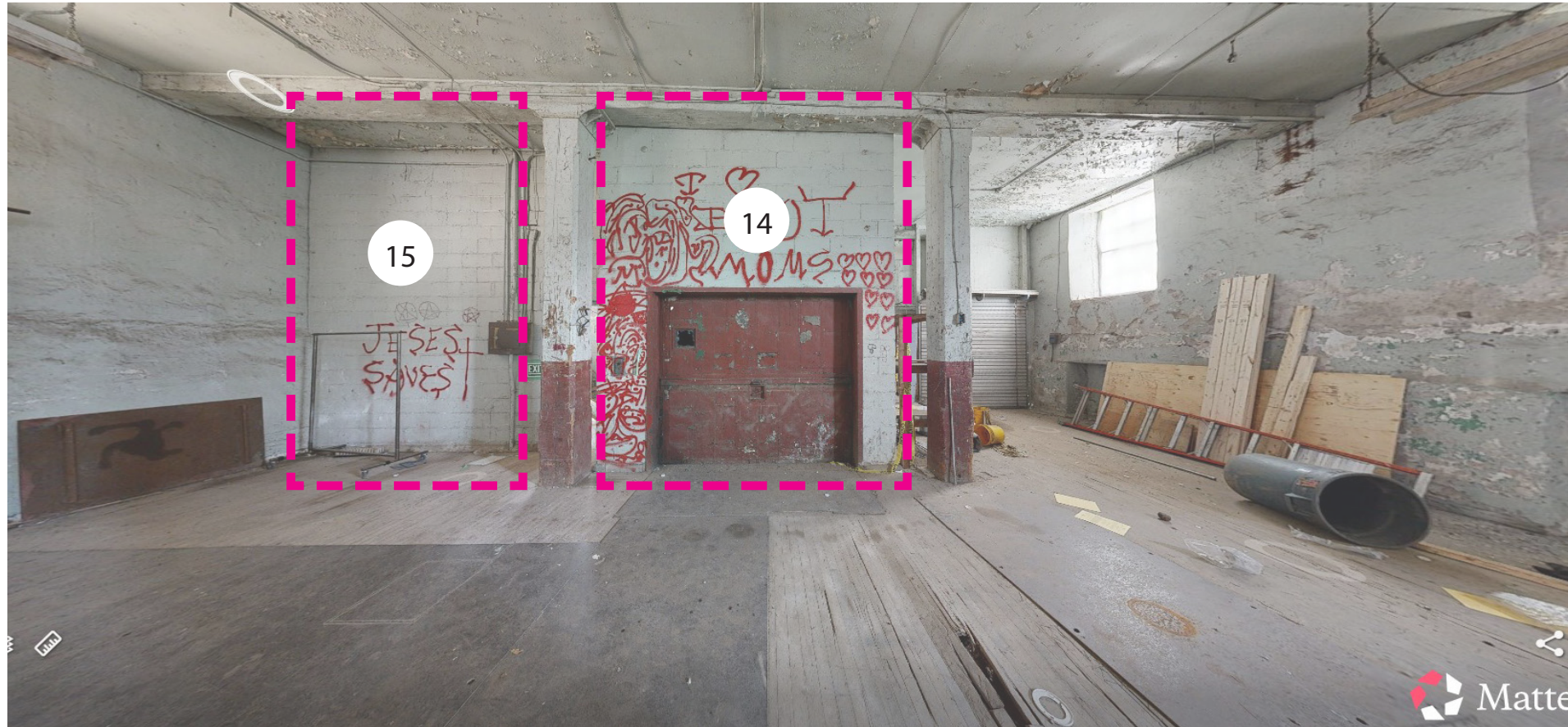


13. Maintain existing garage style opening for new main entrance; to be replaced with glazed door suite.

14. Demolish existing elevator shaft on all levels.

15. Maintain and restore existing N-W stairwell; to be reviewed further under OBC Part 11 Renovation.



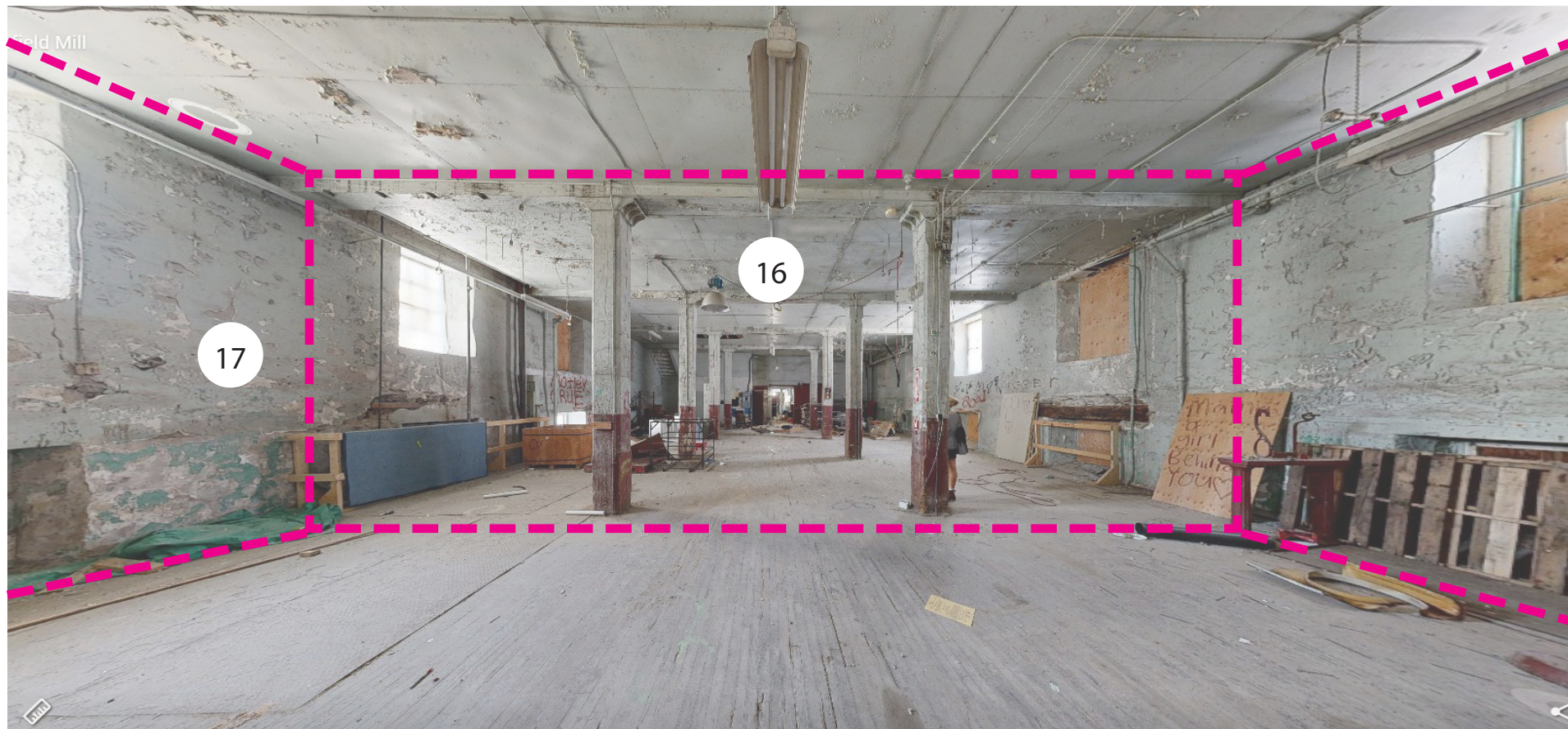


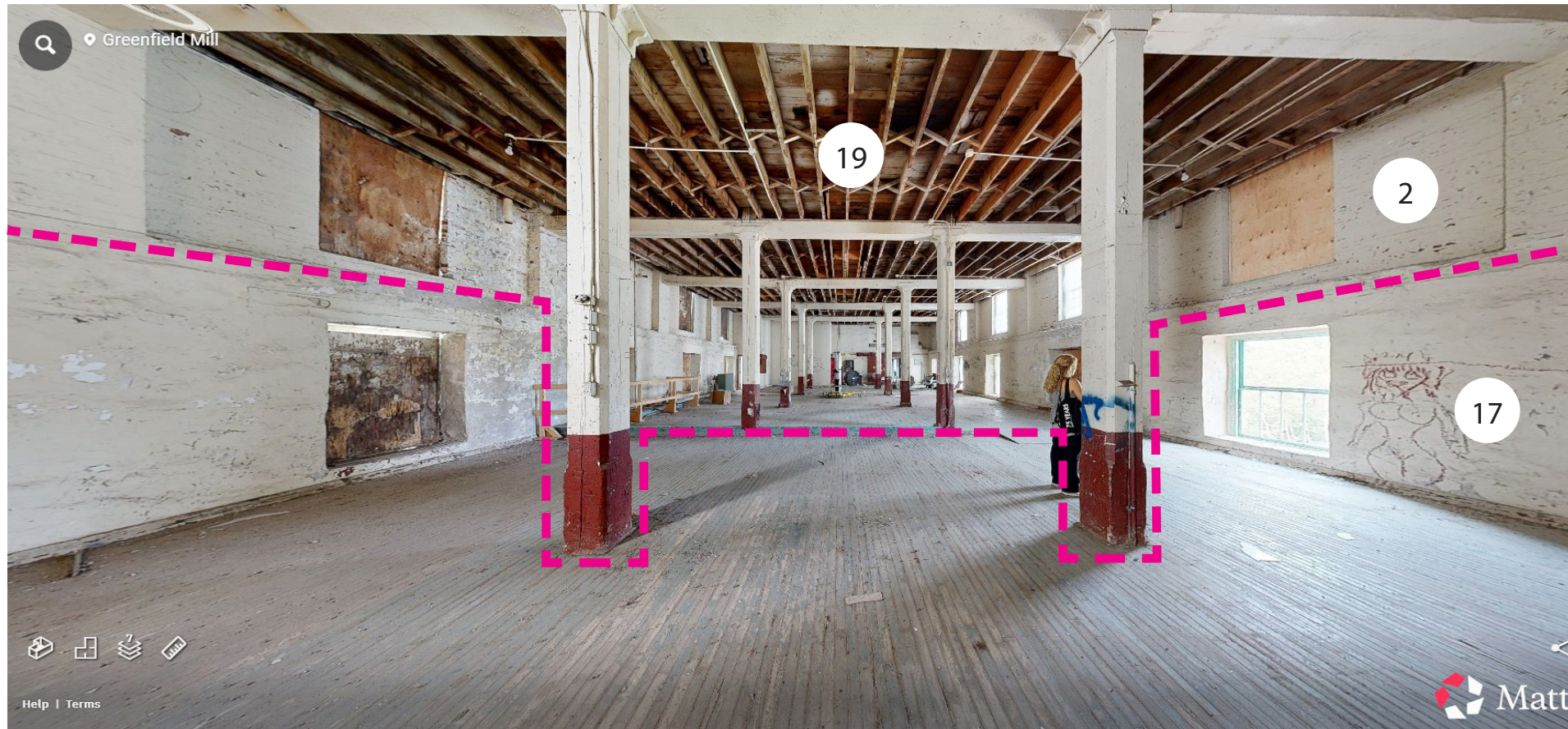
14. Demolish existing elevator shaft on all levels.

15. Maintain and restore existing N-W stairwell; to be reviewed further under OBC Part 11 Renovation.

16. Maintain and restore all existing column and beams up within existing stone structure.

17. Maintain and restore all stone walls at the interior face; approach to building envelope t.b.d. (e.g. extent and location for insulation back-up walls).



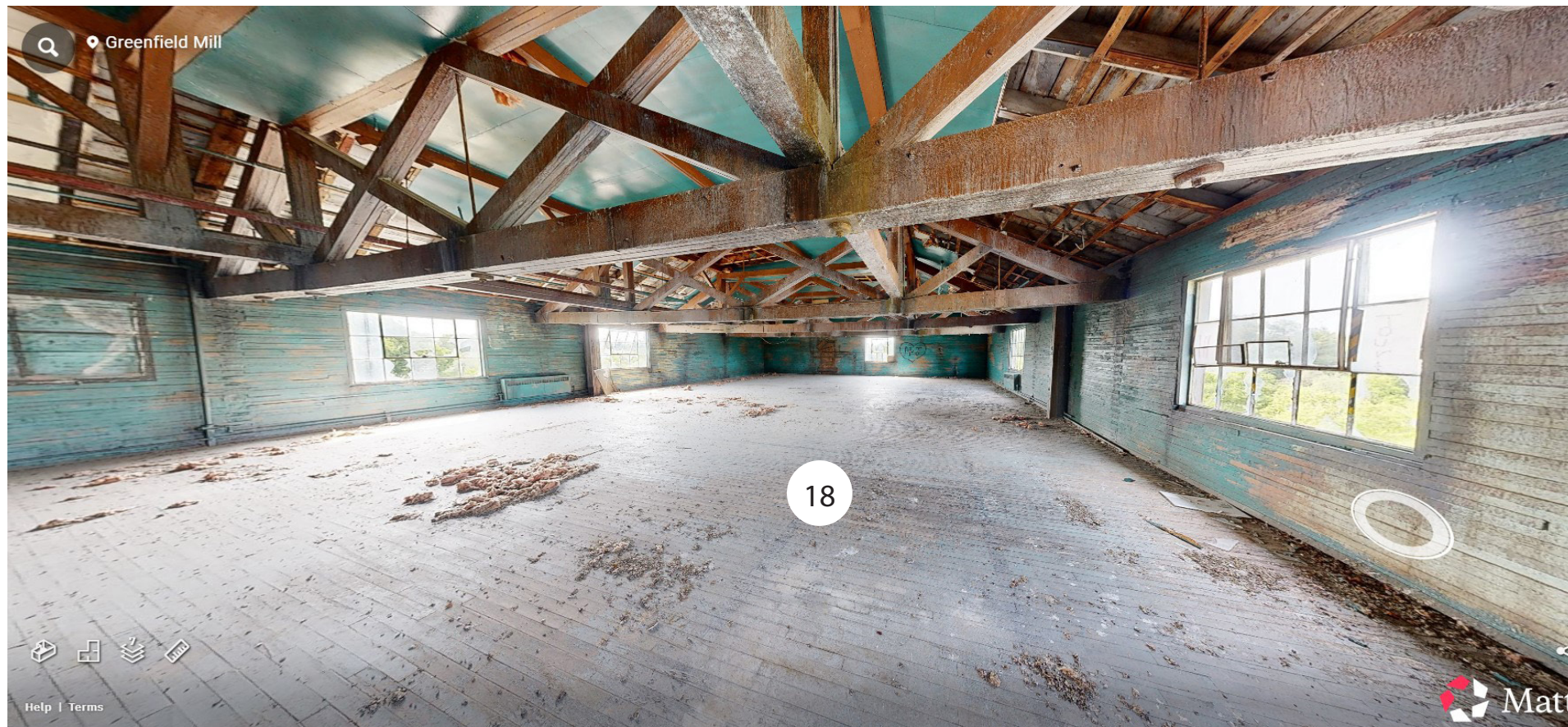


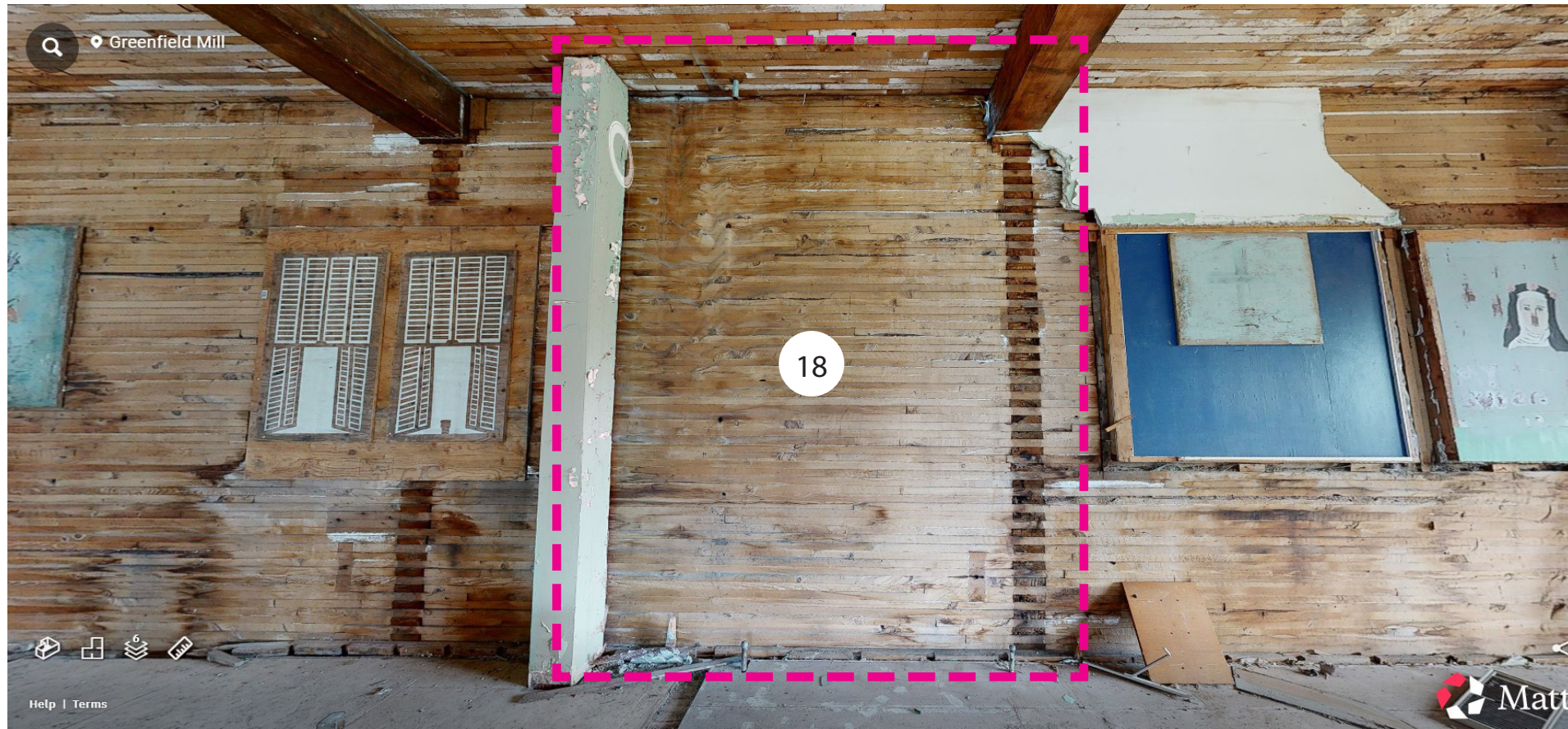
2. Remove upper storey and a half, at line of brick facades; prepare for new wall extension and new roof.

17. Maintain and restore all stone walls at the interior face; approach to building envelope t.b.d. (e.g. extent and location for insulation back-up walls).

18. Remove the South wood Addition entirely; maintain and restore best components for use in adaptive reuse. If feasible, maintain best sections of nail-lam timber walls for use as interior features. Note: Addition to be replaced with new structure.

19. Remove existing columns, beams, roof at Level 04, to prepare for new full-spanning structure, wall extension and new roof.



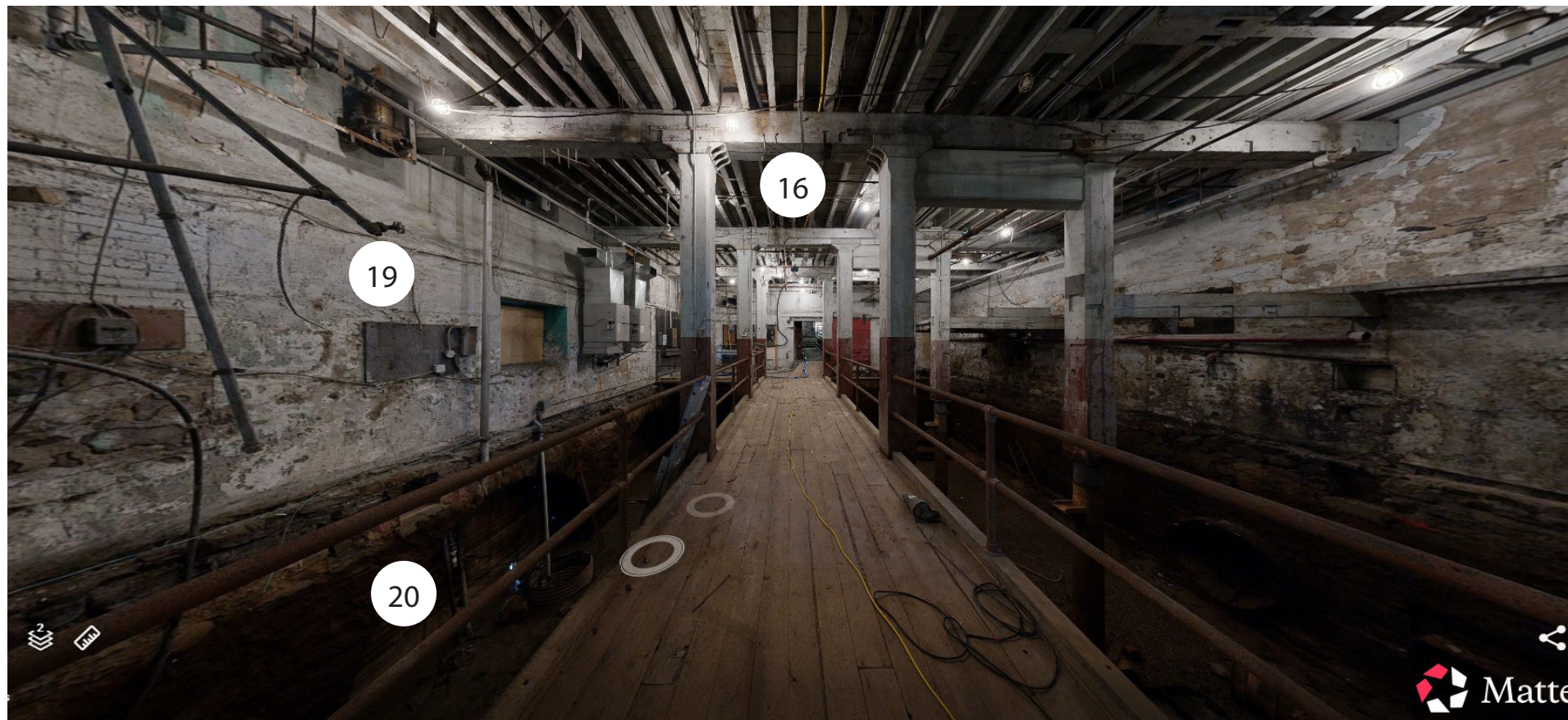


16. Maintain and restore all existing column and beams up within existing stone structure.

18. Remove the South wood Addition entirely; maintain and restore best components for use in adaptive reuse. If feasible, maintain best sections of nail-lam timber walls for use as interior features. Note: Addition to be replaced with new structure.

19. Existing stone walls to be repainted/repared and existing openings to be restored at basement levels on South and East sides for natural light.

20. Lowest basement level to be repurposed as Groom Suite/Wine Cellar with partial open to above floor area at the East wall is proposed.

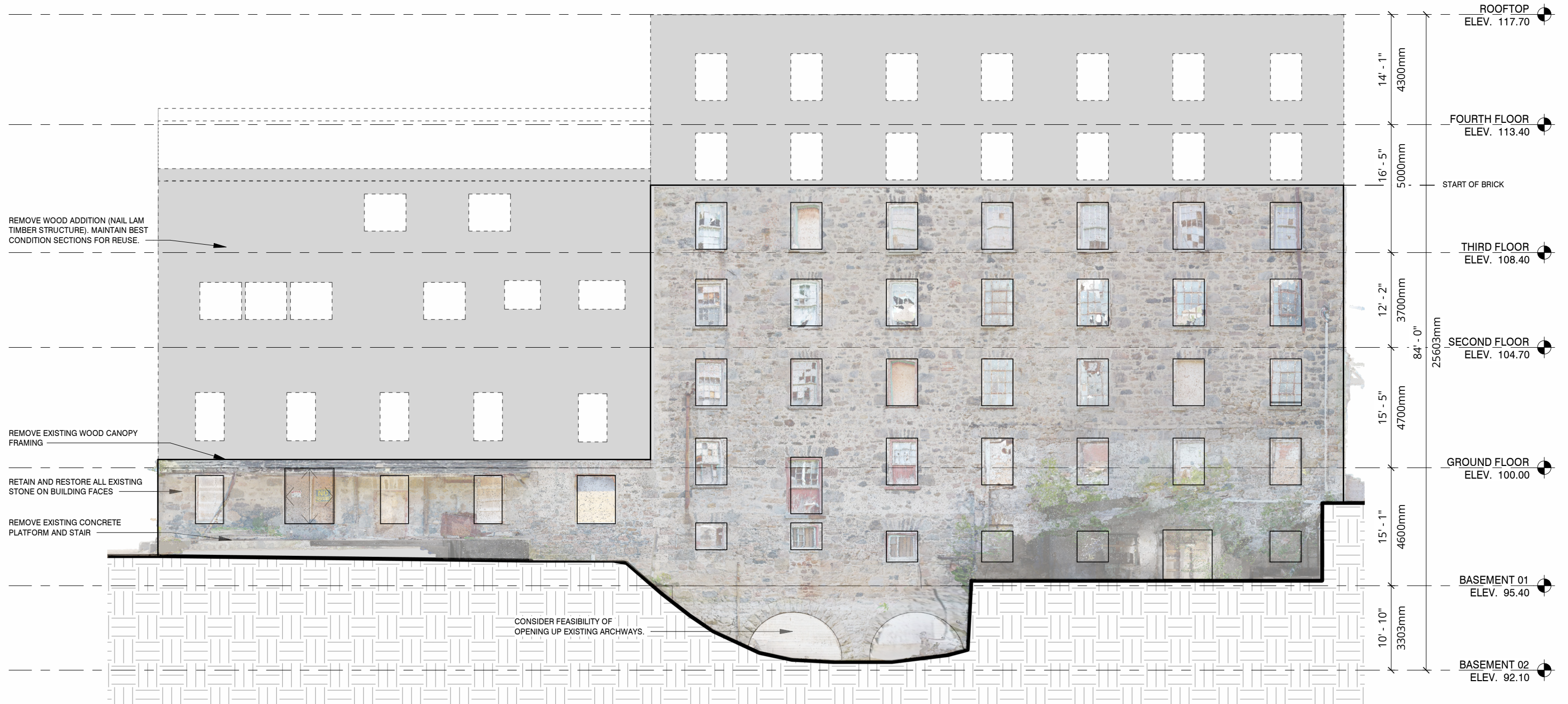




APPENDIX C: DEMOLITION PLAN

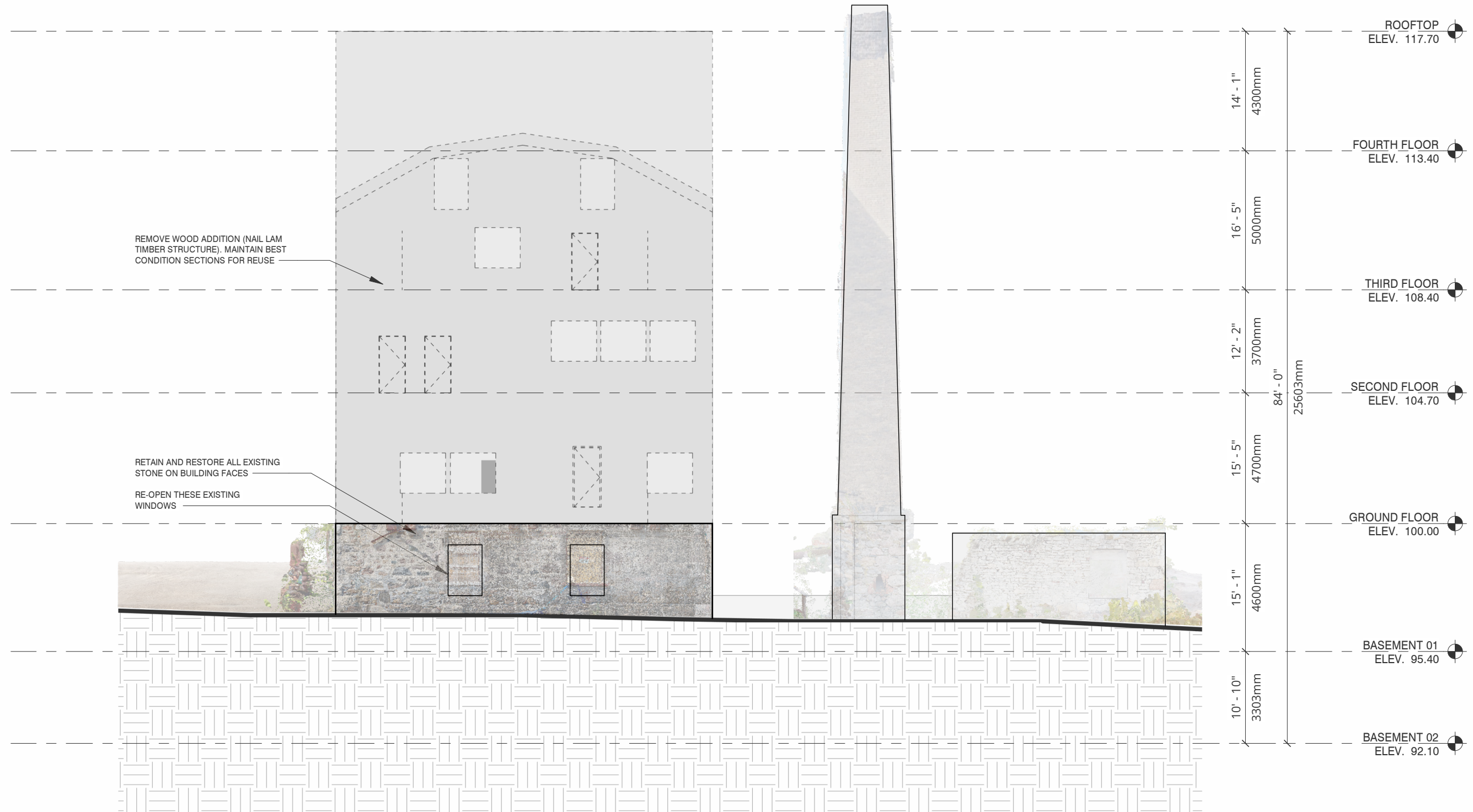
3089 Greenfield Road, Ayr
EAST ELEVATION (Demo)

1 : 150



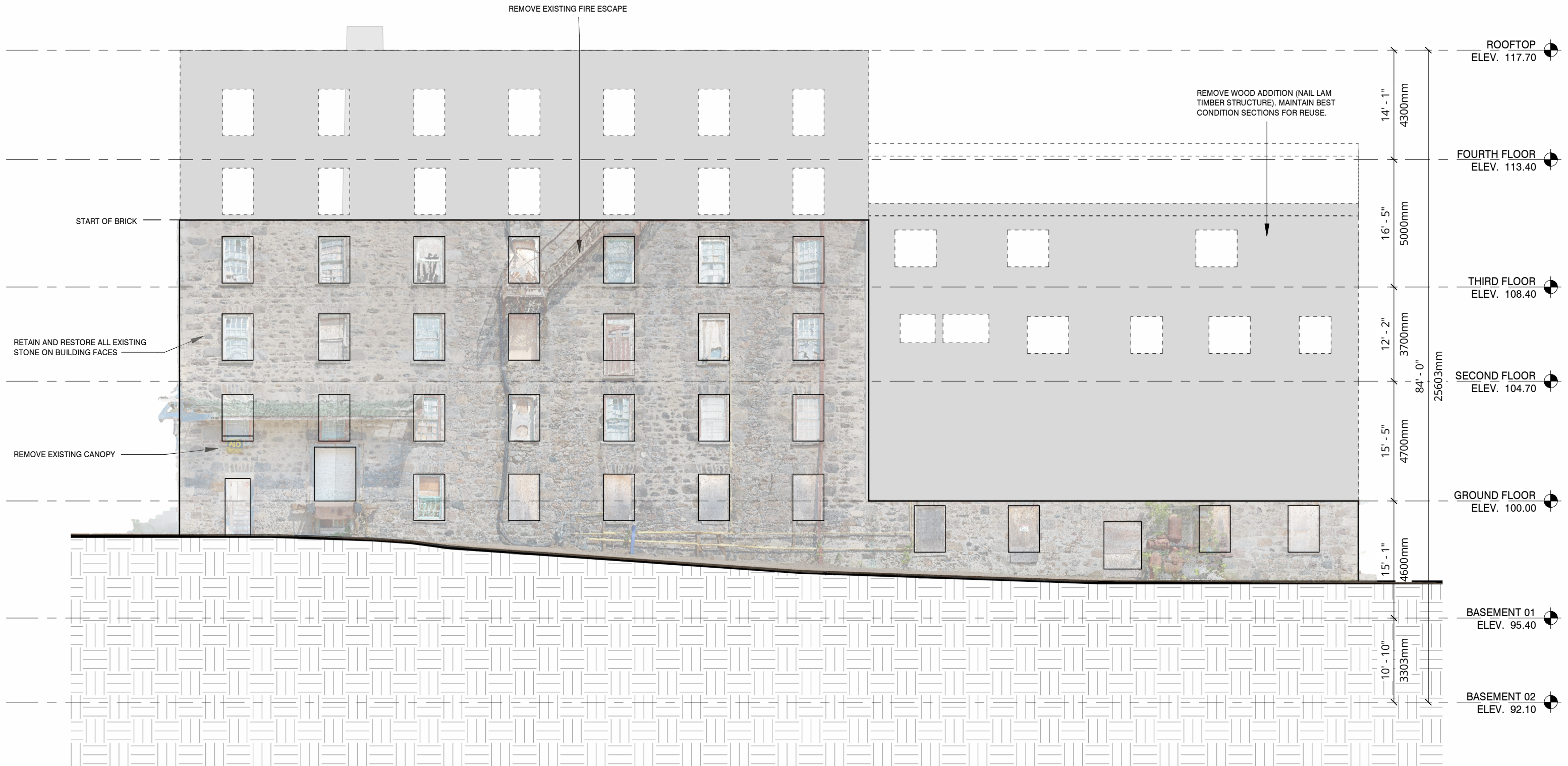
3089 Greenfield Road, Ayr
SOUTH ELEVATION (Demo)

1 : 150



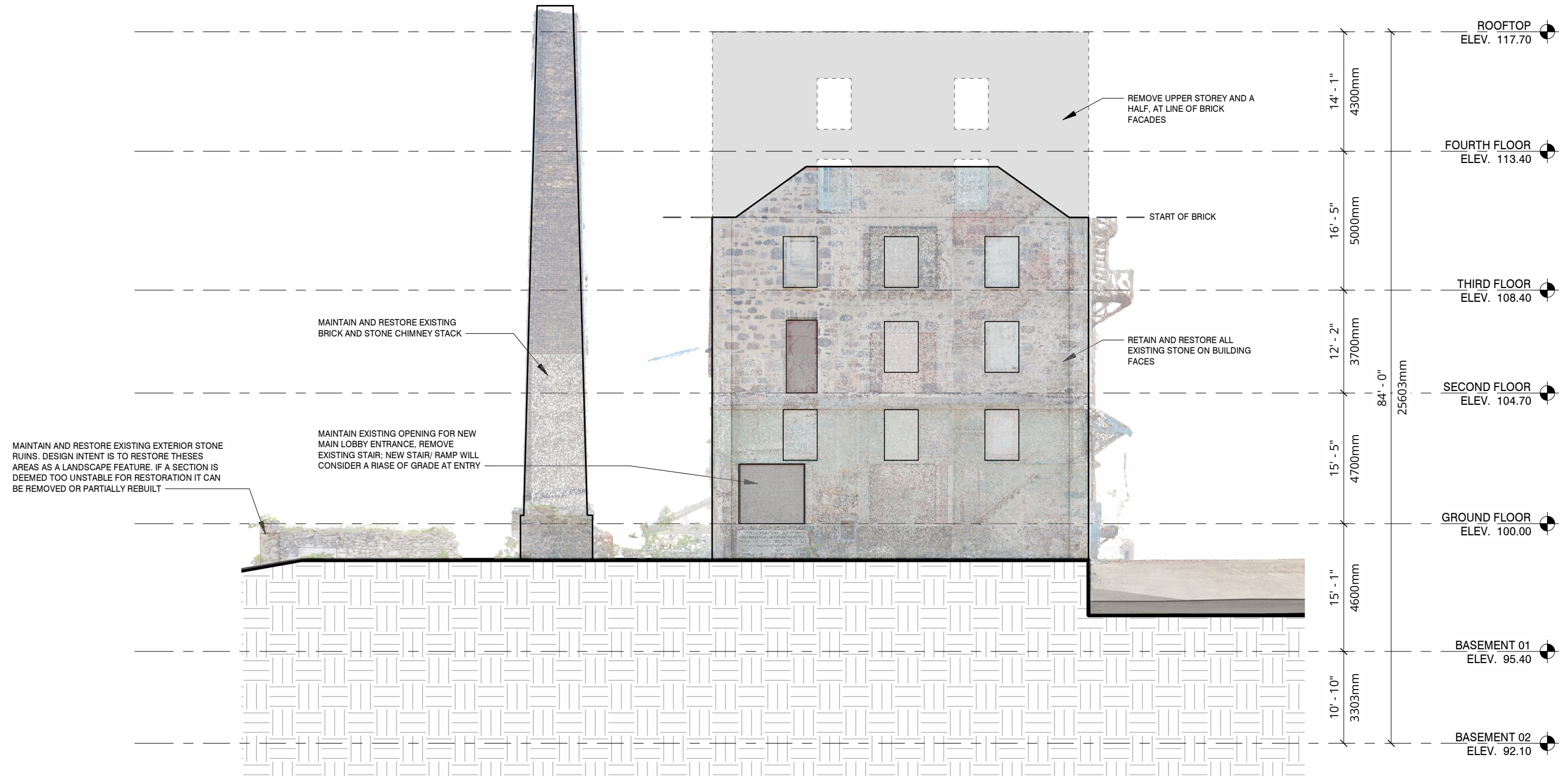
3089 Greenfield Road, Ayr
WEST ELEVATION (Demo)

1 : 150



3089 Greenfield Road, Ayr
 NORTH ELEVATION (Demo)

1 : 150



APPENDIX D: BUILDING CONDITION ASSESSMENT BRIEF

Date:	April 23, 2026	No. of Pages:	5 + Encl.
Project:	Greenfield Mill	Project No.:	TW-2747-26
Address:	3089 Greenfield Road, Ayr, Ontario	Permit No.:	N/A
Client:	Martin Simmons Sweets Architects		
Distribution:	Kristin Schreiner Rachel Redshaw Kurt Fried	Martin Simmons Sweets Biglieri Group Building Owner	kschreiner@mssarchitects.ca rredshaw@thebiglierigroup.com kurt@greenfieldmillco.ca

Background

Tacoma Engineers has been retained by Martin Simmons Sweets Architects to provide structural engineering assessment for the existing mill located at 3089 Greenfield Road, Ayr, Ontario, locally known as the Greenfield Mill.

Tacoma Engineers is being retained as a sub-consultant of Martin Simmons Sweets, who have been retained directly by the Owner. This report is not being prepared as a response to an Order, recommendations, or request by any regulatory body.

The primary purpose of this assessment is to provide a baseline against which future conditions of the structure can be measured. The intention is to provide a snapshot of the current building condition, and to provide guidance for future planning and redevelopment of the site.

This report is based on a visual inspection only and does not include any destructive testing. Where no concerns were noted, the structure is assumed to be performing adequately. The structure is assumed to have been constructed in accordance with best building practices common at the time of construction. No further structural analysis or building code analysis has been carried out as part of this report unless specifically noted.

The subject building was purpose built as a mill by John Goldie and the Goldie Milling Company. The original portions of the building were believed to be constructed between 1863 and 1868, with various changes and additions being added over the years, until the Mill ceased operating in 1964.

Greenfield Mill is designated under Part IV of the Ontario Heritage Act.

On April 10, 2026, the undersigned, accompanied by Emily van Riesen of Tacoma Engineers reviewed the property in detail. Development of a comprehensive structural condition assessment is underway. A summary of our preliminary findings can be found below.

1. General Structural Conditions

The building can be considered two separate structures for the purposes of this report.

The six-storey portion is constructed with an interior timber structure. Exterior walls are constructed with mass masonry and brick.

The four-storey portion is constructed with an interior timber structure, including timber trusses for the roof framing. The exterior walls are constructed with horizontally laid timber planks, known as nail-lam timber walls.

In addition, there are several interior structures constructed of concrete masonry units, which provide support for the interior stairs and freight elevator.

1.1. Interior Wood Framing

The interior wood framing was found to be in fair condition. Some isolated areas had experienced damage due to long term water ingress.

Evidence of previous reinforcing was noted in select areas where previous equipment was assumed to have been located. None of the reinforcing was found to have been done to address poor condition, or overloading scenarios on the floor framing.



Photograph 1: Interior Wood Framing

1.2. Exterior Mass Masonry Walls

The exterior mass masonry walls were found to be in poor condition, with signs of long-term deterioration. When exposed to the elements, lime based mortars used at the time of construction of the original building are susceptible to deterioration. Preventative maintenance, such as repointing repairs are required to maintain a structurally sound and water tight wall. This preventative maintenance has not been done on a regular basis, and as such, restoration will be required. No structurally concerning areas were found, however the restoration work should be carried out as a part of any redevelopment of the site.

The interior face of the mass masonry has been painted and / or parged, so observations were limited. The window openings were structured with heavy timber lintels. Isolated lintels have experienced deterioration due to water ingress, and will need to be replaced.



Photograph 2: Exterior Walls

1.3. Nail-Lam Exterior Walls

The nail-lam timber walls were found to be saturated and in poor condition, due to long term exposure to the elements. The exterior cladding, an asphaltic based shingle is at an advanced state of deterioration, and provides little to no protection to the nail-lam walls from the elements.

Evidence of a roof leak in the south-east corner of the building was found. It was reported that the roof had been recently replaced, and the leaking controlled. However, this corner of the building was found to be in very poor condition, with significant bowing. The structure had been shored to prevent collapse. It is anticipated that a significant portion of this corner of the building would need to be reconstructed to provide long term stability to the structure.



Photograph 3: Nail-Lam Portion from Exterior

1.4. Ruins and Chimney

To the east of the site, there are a set of stone ruins and a brick chimney. The ruins were found to be in poor condition. The top of the wall was unprotected from the elements, and as such, water has been allowed to enter the “core” of the wall, causing deterioration. From our preliminary findings, it is anticipated that the ruin walls will need to be reconstructed to ensure long term stability.

The chimney is constructed with yellow clay brick masonry, approximately 70’-0” high. The top 6’ to 10’ was found to be in poor condition, with restoration required. It is also anticipated that the top of the chimney will need to be closed to prevent long term exposure to the elements. It should be noted that the chimney is a suspected chimney swift habitat, and as such, the covering will need to conform to the required regulations surrounding endangered animals.



Photograph 4: Ruins and Chimney

2. Conclusions

In general, the building is in poor condition. Long term deferred maintenance has caused advanced damage to the building structure. However, anticipated restoration, to be carried out as a part of the redevelopment of the property will address any long term affects.

Significant reconstruction of the nail-lam portion of the building is anticipated, which may make restoration of this area unpractical from a project budget prospective.

Per

Nick Lawler, M.A.Sc., PE, P.Eng., CAHP
Waterloo Team Lead, Senior Associate
Tacoma Engineers

Encl. Nil.



APPENDIX E: TOWNSHIP'S TERMS OF REFERENCE FOR SCOPED CHIA



The TOWNSHIP of
NORTH DUMFRIES

**CULTURAL HERITAGE IMPACT ASSESSMENT
TERMS OF REFERENCE**

Prepared By: Planning Division
Development Services Department
June 2016
Revised November 2018

1. **When is a Cultural Heritage Impact Assessment Required?**

A Cultural Heritage Impact Assessment (CHIA) is required for the following application types if the application is adjacent to or contains a property that is included on the *Township of North Dumfries Inventory of Buildings of Architectural and Historical Importance*:

- Notice of Intent to Demolish – Section 27(3) of the *Ontario Heritage Act*
- Application to Demolish – Section 34(1) of the *Ontario Heritage Act*
- Official Plan Amendment
- Zoning By-law Amendment
- Plans of Subdivision / Condominium
- Site Plan Control

A CHIA may be required by Staff for the following additional application types:

- Consent and/or Minor Variance and Building Permit applications for any property included on the *Township of North Dumfries Inventory of Buildings of Architectural and Historical Importance*
- Consent and/or Minor Variance and Building Permit applications for any property adjacent to a cultural heritage resource included on the *Township of North Dumfries Inventory of Buildings of Architectural and Historical Importance*

2. **Purpose of a Cultural Heritage Impact Assessment**

Heritage conservation involves identifying, protecting and promoting the elements that our society values. A CHIA is the primary heritage planning tool utilized by the Township to assess and review the potential cultural heritage significance of a particular resource, consider the impact of any proposed site development or alteration and recommend an overall approach that best conserves any identified cultural heritage resource(s).

A CHIA forms an integral part of the Municipal planning framework. Its rationale emerges from a range of Provincial and Municipal policies including:

- *Provincial Policy Statement, 2014*, Policies 2.6.1 and 2.6.3
- *Ontario Planning Act, R.S.O. 1990*, Part I, 2(d)
- *Ontario Heritage Act, R.S.O. 1990*, Part IV, Sections 27, 29 and 34
- *Township of North Dumfries Official Plan*, Sections 7.1, 7.2, 7.3 and 7.5

Where there is a potential of impacting archaeological resources an archaeological assessment must be undertaken by a licensed archeologist as an additional study. Please refer to the Ministry of Tourism, Culture and Sport for the triggers and stages of an archeological assessment.

3. Who Can Prepare a Cultural Heritage Impact Assessment ?

All CHIAs and other related documents including adaptive reuse plans and site security plans must be prepared by a qualified heritage professional such as a heritage planner and/or heritage architect with a demonstrated knowledge of accepted heritage conservation standards, and who has undertaken historical research and identification / evaluation of cultural heritage value.

All heritage consultants submitting a CHIA must be members in good standing of the Canadian Association of Heritage Professionals.

In addition, under Provincial law, only a licensed, professional archeologist may carry out an Archeological Assessment using specific Provincial standards and guidelines.

4. What Should a Cultural Heritage Impact Assessment Contain and in What Format?

The CHIA will include, but is not limited to the following information:

(1) Introduction to the Development Site

- A location plan indicating the subject property (Property Data Map and aerial photo).
- Concise written and visual description of the property identifying significant features, buildings, landscape and vistas.
- A concise written and visual description of the cultural heritage resource(s) contained within the development site identifying significant features, buildings, landscape, vistas and including any heritage recognition of the property with existing heritage descriptions as available. Reference should be made to the *Township of North Dumfries Inventory of Buildings of Architectural and Historical Significance*, *Ontario Heritage Properties Database*, *Parks Canada National Historic Sites of Canada*, and/or *Canadian Register of Historic Places*.

- A concise written and visual description of the surrounding context including adjacent heritage properties, their landscapes and any potential undesignated cultural heritage resource(s).
- Present owner contact information.

(2) Overview of Applicable Heritage Legislation, Policies and Guidelines

The CHIA must provide a detailed description of the heritage planning framework stemming from legislation, policies and guidelines that are applicable to the subject proposal. In addition, an analysis must be provided below under Conservation Strategy in sub-section 9 of this document, on how the proposal has been developed in accordance with the applicable heritage planning framework.

Legislation, policies and guidelines (as updated from time to time) that are to be assessed **must include**, but are not limited to:

- The *Ontario Heritage Act*
- The *Planning Act*
- The *Provincial Policy Statement*
- The *Growth Plan for the Greater Golden Horseshoe*
- Ontario Heritage Tool Kit (Ministry of Culture)
 - ~~Heritage Property Evaluation~~
 - Heritage Conservation Districts
 - Heritage Resources in the Land Use Planning Process
- Eight Guiding Principles in Conservation of Built Heritage Properties (Ministry of Culture, 2007)
- Standards and Guidelines for the Conservation of Historic Places in Canada (Canada's Historic Places, 2010)
- Building Resilience: Practical Guidelines for the Sustainable Rehabilitation of Buildings in Canada (2016)
- Region of Waterloo – Practical Conservation Guidelines for Heritage Properties. These guidelines provide heritage conservation tips on topics such as additions, infill and new construction, landscaping, masonry, metalwork, paint and colour, porches, roofs, and windows/shutters/doors.
- Region of Waterloo - Official Plan (2015)
- Region of Waterloo - Arts, Culture and Heritage Master Plan (2002)
- Region of Waterloo – Archaeological Facilities Master Plan (1989)
- Region of Waterloo - Guidelines for CHL Conservation (2013; Reviewed 2017)
- Township of North Dumfries - Official Plan



- Township of North Dumfries - Cultural Heritage Impact Assessment Terms of Reference
- Township of North Dumfries - Greenfield Heritage Conservation District Study Report (January 2014)
- Township of North Dumfries - Greenfield Heritage Conservation Plan Report (March 2014)
- The Grand River – Canadian Heritage System

(3) Background Research and Analysis

- Comprehensive written and visual research and analysis related to all potential cultural heritage value or interest of the site (both identified and unidentified) as per the applicable legislation, policies and guidelines including: physical or design, historical or associative, and contextual values.
- A development history of the site including original construction, additions and alterations with substantiated dates of construction.
- Research material to include relevant historic maps and atlases, drawings, photographs, sketches / renderings, permit records, land records, assessment rolls, Township of North Dumfries directories, etc.

(4) Statement of Significance

- A statement of significance identifying the cultural heritage value and heritage attributes of the cultural heritage resource(s). This statement will be informed by current research and analysis of the site as well as pre-existing heritage descriptions. This statement is to follow applicable legislation, policies and guidelines such as the Provincial guidelines set out in the *Ontario Heritage Tool Kit*.
- The statement of significance will be written in a way that does not respond to or anticipate any current or proposed interventions. The Township may, at its discretion and upon review, reject or use the statement of significance, in whole or in part, in crafting its own statement of significance (reasons for listing or designation) for the subject property.
- Professional quality record photographs of the cultural heritage resource in its present state.

(5) Assessment of Existing Condition

- A comprehensive written description accompanied with high quality color photographic documentation of the cultural heritage resource(s) in its current condition and physical context (location, streetscape, etc).
- If demolition or removal of the heritage resource (in full or part) is proposed, a companion written and visual assessment and analysis by a qualified individual shall be undertaken which documents the economic value of the building in terms of structural deficiencies, mold, water or outside climate damage to the interior of the building, or other factors influencing the request. The analysis and assessment shall include the ability to restore and recover against the observed physical damage (in full or in part). The demolition must be assessed in accordance with applicable legislation, policies and guidelines.

(6) Description of the Proposed Development or Site Alteration

- A written and visual description of the proposed development or site alteration.

(7) Impact of Development or Site Alteration

- An assessment identifying any impact(s) the proposed development or site alteration may have on the cultural heritage resource(s) as per applicable legislation, policies and guidelines. Impacts on a cultural heritage resource(s) as stated in the *Ontario Heritage Tool Kit* and *Appleton Charter* include, but are not limited to:
 - + Removal of any, or part of any, significant heritage attributes or features
 - + Alteration that impact on the historic fabric and appearance
 - + Shadow impacts that alter the appearance and/or setting of a heritage attribute, or change the viability of an associated natural feature
 - + Isolation of a heritage attribute from its surrounding environment, context or a significant relationship
 - + Direct or indirect obstruction of significant views or vistas within, from or of built and natural features

- + A change in land use (such as rezoning a church to a multi-unit residence) where the change in use negates the property's cultural heritage value
- + Land disturbances such as a change in grade that alters soils, and drainage patterns that adversely affect a cultural heritage resource, including archeological resource
- + Relocation (to be considered under the conditions described in the *Appleton Charter*)

(8) Considered Alternatives and Mitigation Strategies

- An assessment of alternative options, mitigation measures, and conservation methods that may be considered to avoid or limit the negative impact on the cultural heritage resource(s), as per applicable legislation, policies and guidelines. Methods of minimizing or avoiding a negative impact on a cultural heritage resource(s) as stated in the *Ontario Heritage Tool Kit* include, but are not limited to:
 - + Alternative development approaches
 - + Isolating development and site alteration from significant built and natural features and vistas
 - + Design guidelines that harmonize mass, setback, setting and materials;
 - + Limiting height and density so as to respect scale and context of the significant built heritage resource
 - + Allowing only compatible infill and additions that are complementary and reinforce the key elements or attributes of the built heritage resource
 - + Reversible alterations
 - + Relocation (to be considered under the conditions described in the *Appleton Charter*)

(9) Conservation Strategy

- The preferred strategy based on best-practice conservation principles and applicable legislation, policies and guidelines that protect and enhance the

cultural heritage value and heritage attributes of the cultural heritage resource(s) including, but not limited to:

- + A mitigation strategy including the proposed methods
 - + A conservation scope of work including the proposed methods
 - + An implementation and monitoring plan
 - + Recommendation for additional studies / plans related to, but not limited to: conservation, interpretation and/or commemoration
- If removal of the cultural heritage resource is recommended, the CHIA must provide site specific requirements in terms of features or resources that can be protected, removed and re-used, and, undertake a photographic documentation of the history and importance of the built feature prior to demolition. The photographic documentation shall be presented and transferred to the Township.
 - A detailed analysis on how the preferred strategy is in accordance with the applicable legislation, policies and guidelines. Reference conservation principles and precedents.

(10) Appendices

- A bibliography listing research materials used and sources consulted in preparing the CHIA

5. *How Many Copies of a CHIA are to be Provided to the Township?*

- Please provide the following to the Township of North Dumfries Planning Division:
 - + Three (3) bound hard copies
 - + One (1) camera ready copy
 - + One (1) CD copy in a PDF Format

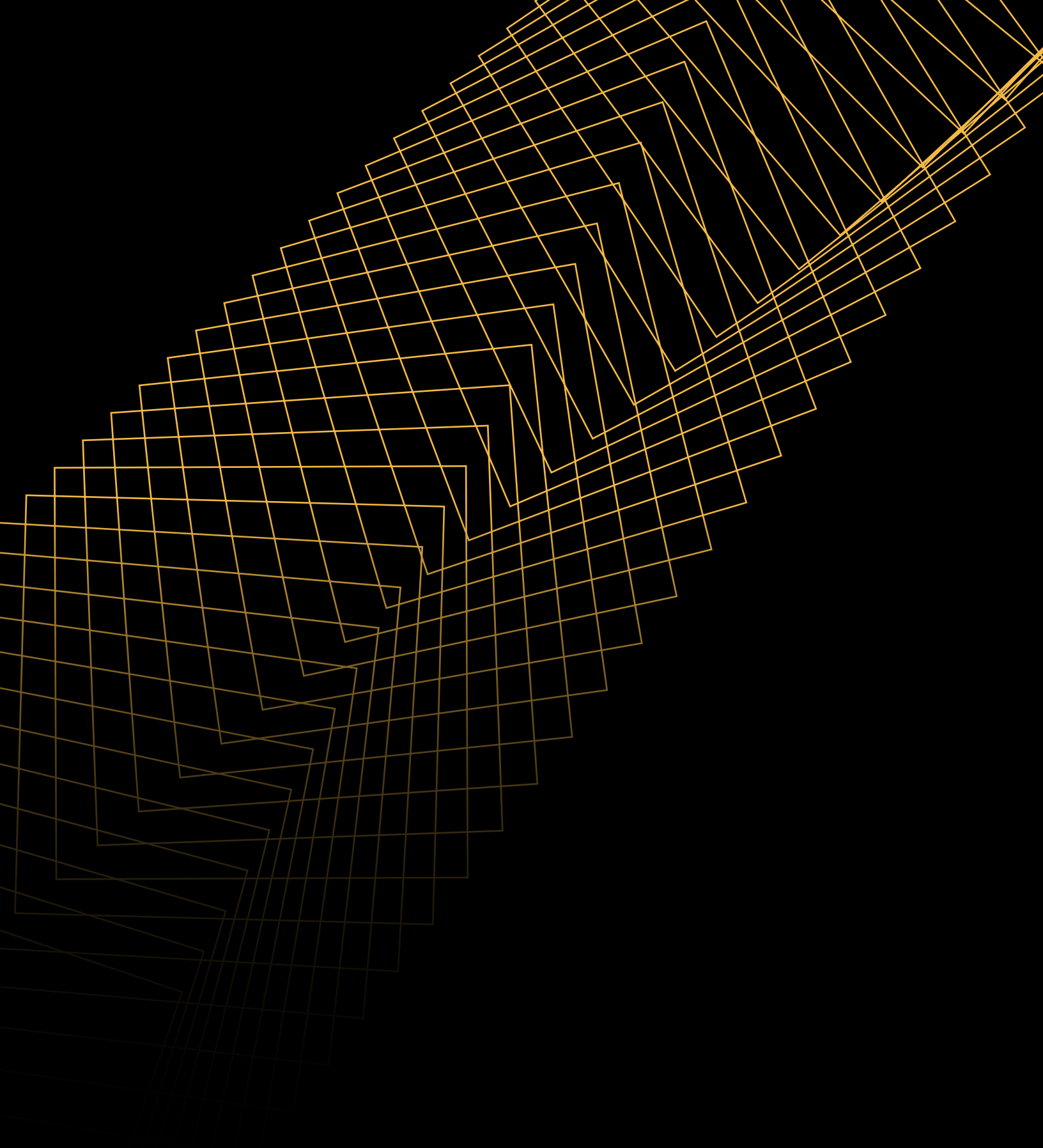
6. Consultation Process

- As part of the consideration of a CHIA, consultation with Township Staff and the North Dumfries Heritage Advisory Committee are required. This shall involve:
 - + A pre-consultation meeting with Staff prior to the commencement of the CHIA.
 - + Presentation and discussion with the Heritage Advisory Committee and Township Staff on the *draft* CHIA Report.
 - + Presentation and recommendations with the Heritage Advisory Committee and Township Staff on the *final* CHIA Report.
 - + Staff Report to Council on the CHIA Report.

Contact Information:

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