

PEER REVIEW

of

**CULTURAL HERITAGE LANDSCAPE ASSESSMENT
AND HERITAGE IMPACT ASSESSMENT**

by

ERA ARCHITECTS INC.

Nov. 9 2016

as

submitted to the Town of Oakville

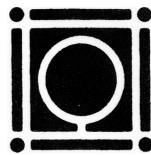
by

Clublink Corporation ULC and Clublink Holdings Ltd.

in support of its development applications for

a proposed mixed-use development of

the Glen Abbey Golf Club



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Huntsville, Ontario

6 September 2017

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I. INTRODUCTION

I.1 MANDATE

This report has been produced in response to a request from the Town of Oakville to carry out an independent peer review of a document entitled *Cultural Heritage Landscape Assessment and Heritage Impact Assessment*, prepared by ERA Architects Inc. It was submitted to the Town by Clublink Corporation ULC and Clublink Holdings Ltd. in support of its development applications for a proposed mixed-use development of the Glen Abbey Golf Club.

That document is hereafter referred to as 'the ERA Report'.

It should also be noted that the full property of approximately 229 acres, identified in the ERA Report as the Glen Abbey Golf Club, is hereafter referred to in this report as simply 'Glen Abbey'.

I.2 SCOPE

As part of the peer review, arrangements were made for the author to make a day-long visit to the site during its hosting of the Canadian Open. Additional documents related to the Town's cultural heritage landscape framework and to Glen Abbey were made available for consultation and review. The author's report on the values and attributes of the Glen Abbey property, as well as the Town's report on an intention to designate, were occurring in parallel with this report. The peer review itself was undertaken independently, drawing on these resources plus the author's own experience working with cultural heritage landscape theory and practice at the local, national and international levels.

1.3 LITERATURE REVIEW

The following material was reviewed:

- ERA Architects Inc. *Cultural Heritage Landscape Assessment and Heritage Impact Assessment: Proposed Redevelopment of the Glen Abbey Golf Club, Oakville*

- Town of Oakville *Livable Oakville: Town of Oakville Official Plan*
- _____ *Oakville Cultural Heritage Landscapes Strategy*
- _____ *Terms of Reference for a Heritage Impact Assessment for Cultural Heritage Landscapes*
- _____ *Terms of Reference for a Heritage Impact Assessment Required as part of a Complete Planning/Heritage Application*
- _____ *Notice of Intention to Designate - 1333 Dorval Drive*
- Julian Smith & Associates *Cultural Heritage Landscape Values and Attributes of the Glen Abbey Property*

- Letourneau Her. Consult. *Final Report: Cultural Heritage Landscape Strategy Implementation - Phase II: Cultural Heritage Report. 1333 Dorval Drive (Glen Abbey Golf Course), Oakville, Ontario*

- Halton Region *Halton Region Official Plan*
- Government of Ontario *Ontario Heritage Act*
- _____ *Planning Act*
- _____ *Provincial Policy Statement*
- Ontario Heritage Trust *Cultural Heritage Landscapes: An Introduction*
- Min. of Municipal Affairs *2017 Growth Plan for the Greater Golden Horseshoe*
- Min. of Tourism & Culture *Heritage Conservation Principles for Landuse Planning*
- City of Kitchener/Landplan *Cultural Heritage Landscapes*
- Parks Canada *Standards and Guidelines for the Conservation of Historic Places in Canada*

- UNESCO *World Heritage Centre: Cultural Landscapes*
- _____ *World Heritage Convention: Operational Guidelines*
- _____ *Recommendation on the Historic Urban Landscape*

In addition, reference was made to other related documents and best practices in the cultural heritage landscape field. This included reviewing the work of the Cultural Landscape Foundation based in Washington, D.C. as well as the activities of the Cultural Landscape International Scientific Committee of ICOMOS (advisory body to UNESCO), and the Joint Culture/Nature Initiative of ICOMOS and IUCN related to cultural landscapes and UNESCO's World Heritage Convention.

II. SUMMARY OF FINDINGS

There are five fundamental and inter-related concerns with the E.R.A. document. The first three have to do with the Cultural Heritage Landscape Assessment, the fourth with the Heritage Impact Assessment, and the fifth with the overall report.

1. A review of the evidence indicates that Glen Abbey is, first and foremost, a *designed* cultural landscape, not an *evolved* cultural landscape as suggested in the ERA document. The evidence seems quite clear, and this distinction is critical.
2. The assessment process for a *designed* cultural landscape is compatible with the criteria set out in Ontario Regulation 9/06, despite the claims in the ERA document. The partial, component-based approach suggested in that document, while perhaps relevant for some *evolved* cultural landscapes, is not particularly relevant or informative in the Glen Abbey situation.
3. The *Statement of Significance* needs to be rewritten to reflect a full and proper re-assessment, one that treats the property as a whole before considering its components. This is the only way to recognize its full significance.
4. The Heritage Impact Assessment is not relevant in its present form, because it is based on a misleading and incomplete Cultural Heritage Landscape Assessment. The authenticity and integrity of the site, as a *designed* and *significant* cultural heritage landscape, are seriously undermined by the proposed redevelopment. This broader impact must be assessed first, before deciding how to measure the impact on individual components.
5. Overall, the report fails to identify the key cultural heritage values of the property in question, and to highlight their significance. It fails to properly identify the heritage impact of the proposed development on these cultural values, which is severe and irreversible. Such an approach undermines the Provincial Policy Statement directive that significant cultural heritage landscapes shall be conserved.

These concerns are discussed in more detail below, following a broader discussion of cultural heritage landscape theory and practice.

Note: Words in italics are either original to the texts being quoted, or are introduced in the body of the report by the author. In the latter case, they refer to terms that are defined (or form part of definitions) in the reference documents.

III. CULTURAL HERITAGE LANDSCAPE FRAMEWORK

The conservation of significant cultural heritage landscapes is part of the official planning framework for Ontario. The intent is set out in the Provincial Policy Statement (2014) as follows:

2.6 Cultural Heritage and Archaeology

2.6.1 *Significant built heritage resources and significant cultural heritage landscapes shall be conserved.*

Cultural heritage landscape:

a defined geographical area that may have been modified by human activity and is identified as having cultural heritage value or interest by a community, including an Aboriginal community. The area may involve features such as structures, spaces, archaeological sites or natural elements that are valued together for their interrelationship, meaning or association.

As noted in the Ontario Heritage Trust's 2012 document, *Cultural Heritage Landscapes - An Introduction*, the term 'cultural landscapes' was introduced into the heritage field in the 1990s, by the United Nations Educational, Scientific, and Cultural Organization (UNESCO). There was need for a term to apply to sites that combine both natural and cultural significance, and that represent the interaction between human activity and the natural environment. The term also allowed a recognition of both tangible and intangible features - hence the reference in the definition to 'interrelationships, meanings and associations'.

The term 'cultural heritage landscapes' used in Ontario legislation is a variation on the more general term 'cultural landscapes', and recognizes that these have been designated for their 'cultural heritage value'.

The Ontario Heritage Trust, in its guidance document, goes on to define the primary categories of cultural landscapes as first set out by UNESCO. They can be summarized as follows:

- *designed* cultural landscapes - clearly defined and designed intentionally by man.
- *organically evolved* cultural landscapes - a response to an initial cultural imperative, taking on its present form by association with, and in response to, its natural environment
- *associative* cultural landscapes - places where the value arises from powerful religious, artistic or cultural associations with the natural elements, rather than with material cultural evidence (which may be insignificant or absent)

These categories are used both in Ontario and internationally, and are specifically adopted by the Town of Oakville in its *Cultural Heritage Landscapes Strategy* of 2014.

The reason for these categories is to simplify the approach to identification, assessment and management.

A *designed* cultural landscape, such as Versailles, can be understood and treated in ways not so different from those applied to designed buildings or artifacts. Plantings and other natural elements may mature and be replaced over time, but the design intentions that underlie these elements must be understood and respected. Notable works by notable designers are given pride of place in this category, as they represent key achievements in human history. The creations of landscape architect Frederick Law Olmsted are treated not so differently from the creations of building architect Arthur Erickson.

An *evolved* cultural landscape, by contrast, is not the result of any one designer, at any one time, but rather a slow evolution of an urban or rural landscape through thousands of individual design decisions by hundreds of individual property owners. *Evolved* cultural landscapes are the most common form of designated cultural landscapes both in Canada and internationally, and the majority are rural. From rice terraces in the Philippines to the Loire Valley in France to the Grand Pré landscape in Nova Scotia, these landscapes are anonymous but culturally specific. The definition makes it clear that the *present form* of an evolved cultural landscape must reflect this process of evolution. The full and correct term for this category is *organically evolved* cultural landscape, reflecting this ongoing dynamic.

An *associative* cultural landscape is applied to places where the natural elements are dominant, and where it is the cultural associations that give the place its significance. Ayers Rock, or Uluru, the dramatic sandstone rock formation in central Australia, was one of the first *associative* cultural landscapes on the World Heritage List, and the category has since been applied to other indigenous sites in Canada and around the world.

In terms of assessing heritage impact, it is important to measure the effects on the *authenticity* and *integrity* of the cultural heritage landscape. These two terms, again developed by UNESCO and applied globally, are used to judge the significance of the site, at the time of designation, and then to measure the enhancement or loss of significance during a time of change.

Authenticity is used primarily for cultural sites, and relates to the "meanings and associations" referred to in the PPS definition. It occurs at the intersection of the tangible and the intangible, as for example when traditional practices continue to bring a place to life. *Integrity* is used for both natural and cultural sites, and is oriented more towards the physical completeness and health of the place.

IV. REVIEW OF THE CULTURAL HERITAGE LANDSCAPE ASSESSMENT

The purpose of a cultural heritage landscape assessment is to explore whether a given place is a significant cultural heritage landscape. This begins by deciding what its boundaries are, what category best describes the place within these boundaries, and whether the place exhibits sufficient authenticity and integrity to evaluate its significance. If so, its significance is then tested against the criteria of design value, historical value, and contextual value.

The process must be supported both by comprehensive historical research, and by an assessment of current value. For cultural heritage landscapes, current value must address the questions of interrelationships, meanings and associations - the three key categories identified in the Provincial Policy Statement.

The ERA report provides comprehensive historical research, but a limited assessment of current value.

IV.1 FUNDAMENTAL ISSUES

There are three fundamental issues with the Cultural Heritage Landscape Assessment in the ERA report, which are the following:

IV.1.1 Failure to recognize Glen Abbey as a *designed* cultural landscape.

Although the ERA report appears to be following the required framework, by using the UNESCO categories of cultural landscapes as a starting point for the assessment, it fails to justify the decision to label Glen Abbey as an *evolved* rather than *designed* cultural landscape.

To begin with, it does not provide, in either the text or the appendices, the definitions of the three categories of cultural heritage landscape - *designed*, *evolved*, and *associative* - that are required as the basis for this discussion. It simply excerpts, from these documents, the definition of an *evolved* cultural landscape without comparison to the other two.

By doing so, it fails to address the clear relationship between Glen Abbey and the *designed* cultural landscape category. This relationship is central to the discussion.

Glen Abbey was fully designed by the legendary professional golfer and golf course architect, Jack Nicklaus, in the 1970s. Although there have been minor alterations since then, the course contains almost the entirety of Jack Nicklaus' original and groundbreaking design. The boundaries he was working with are essentially unchanged today. The interrelationships between its component parts - land uses, land forms, water features, built features, circulation patterns, and so on - were central considerations in Nicklaus' design and remain fundamental to its understanding to this day. These interrelationships encompass the entirety of the site.

These characteristics are what make this a *designed* cultural landscape - a place that is fully formed at a particular point in time, as a result of a conscious design process.

As the Ontario Heritage Trust guidelines point out, the categories *designed* and *evolved* are both significant and mutually exclusive. To quote the Trust:

- A cultural landscape may be designed at a specific time by a specific person or it may have evolved organically over a long period time (and may still be slowly evolving).

Designed cultural landscapes almost always contain remnants of earlier landscapes or natural features, but this does not fit them into the definition of *evolved* cultural landscapes. The remnants of earlier landscapes become consciously integrated into a new design, which establishes a new and defining character.

In an *evolved* cultural landscape, by contrast, the *present form*, as defined by the Ontario Heritage Trust, would itself reflect the process of evolution. This is why the more accurate term is *organically evolved* cultural landscape.

The agricultural landscape of this area, when it still existed in the early 20th Century, was an *evolved* cultural landscape. It was the result of hundreds of design decisions by many different property owners over a long period of time, sharing only a few cultural assumptions and practices. And there may be a few golf courses, such as some of the very earliest links courses, which have evolved over decades or centuries to their present form.

But Glen Abbey, as with most iconic 20th Century courses, fits quite precisely the definition of being "designed at a specific time by a specific person".

Jack Nicklaus himself refers to Glen Abbey as his design (and in fact his first solo design), and also refers to the stadium nature and the hub-and-spoke design as features of his work at that time, in that place.

The use of the *designed* cultural landscape category for golf courses is reflected in the work of the Cultural Landscape Foundation, the pre-eminent proponent for the recognition of significant cultural landscapes in North America. It should be noted that in the U.S., about 60 golf courses are listed on the National Register of Historic Places, and 4 of these have been registered as National Historic Landmarks. In all cases, it is the golf course as a whole, as an interrelated set of natural and cultural features, that is listed.

It is both important and appropriate, within Ontario's established regulatory system, to classify Glen Abbey as a *designed* cultural heritage landscape. This determination then has consequences for all subsequent sections of the report.

IV.1.2 **Assessment of Glen Abbey under Ontario Regulation 9/06**

The Assessment of Cultural Heritage Value is a key section of the ERA report. This section begins by questioning the applicability of Ontario Heritage Act Regulation 9/06 to Glen Abbey. It uses the argument that these criteria are not useful in assessing the "broad geographic and temporal scale of cultural heritage landscapes and the imprint of varied patterns of use by different ethnic, religious, and cultural groups on these landscapes".

But these are not the conditions at Glen Abbey. It does not have a broad geographic or temporal scale - it has clear, fixed boundaries and a design imprint from the 1970s, virtually unchanged. The golf course has had only one pattern of use and one cultural group (golfers and golf spectators) since its emergence as a *designed* cultural landscape. The use of Ontario Regulation 9/06, in its intended form, is therefore reasonable and appropriate.

The report also says the criteria are difficult to use when applied to only a portion of the property. Again, this is neither necessary nor relevant when considering Glen Abbey. No one is debating, currently, the question of whether one portion or another of the Glen Abbey property has cultural heritage value. The question is whether the golf course as a whole - the *designed* cultural landscape envisioned by Jack Nicklaus, embodied as a physical reality, and experienced by hundreds of thousands of people over many years - has cultural heritage value.

As made very explicit in the Provincial Policy Statement, the cultural heritage value of these places is found in their interrelationships, meanings and associations - not in their isolated components. The components are to be "valued together", not separately.

The interrelationships at Glen Abbey involve the full range of components for cultural landscape assessment, as set out in the *Standards and Guidelines for the Conservation of Historic Places in Canada*. This is one of the key references noted by the Town of Oakville for assessing cultural heritage landscapes.

The defined components are the following (with their nature at Glen Abbey noted in brackets):

- Land Use [golf course]
- Traditional Practices [playing of recreational and tournament golf]
- Land Patterns [serpentine nature of the 18-hole course]
- Spatial Organization [hub-and-spoke design, stadium features]
- Visual Relationships [for golfers, for spectators, for passers-by]
- Circulation [adaptation to topography, golfing patterns]
- Ecological Features [valley, river, marshland, woodland]
- Vegetation [trees, special grasses]
- Landforms [shaping of tees, fairways, greens, viewing berms]
- Water Features [river, water features]
- Built Features [clubhouse, RayDor, stables, etc]

These interrelationships exist at the scale of the golf course as a whole.

The meanings and associations of Glen Abbey are those attitudes towards the place that exist within various communities of interest. These include, but are not limited to, the communities comprised of Club Link members and other recreational golfers, professional golfers participating in tournament golf events, spectators at golfing events, and passersby with visual views into and across the golf course. They also include meanings and associations that exist within the local neighbourhood, the Town of Oakville, the metropolitan Toronto region, and Canada as a whole - all communities of interest for whom the Glen Abbey can be seen to exist as a contributor to sense of place and sense of identity.

As stated very succinctly in the *2017 Growth Plan for the Greater Golden Horseshoe, 4.2.7.1: "Cultural heritage resources will be conserved in order to foster a sense of place and benefit communities, particularly in strategic growth areas."* This last phrase highlights the important role of cultural heritage landscapes in areas where rapid change is undermining this sense of a community's history and current identity.

A property's meanings and associations can extend to earlier aspects of the site's history, through surviving remnants. But in the case of a *designed* cultural heritage landscape such as Glen Abbey, these are very much secondary, as is evident in the current community discussions about the site and its values. The Town of Oakville, in recognizing the significance of Glen Abbey, is referring to the golf course and its setting as an integrated whole.

It is necessary, therefore, that the assessment of cultural value apply Ontario Regulation 9/06 to this overall property, as required by the PPS, before examining the parts. And it is the *present form* that must be used, in accordance with the PPS and the principles outlined in the reference documents.

Appendix I contains notes on how such an application of Regulation 9/06 would occur. This exercise is missing from the ERA report. As can be seen, the results indicate that Glen Abbey, in its present form, is of significant cultural heritage value.

IV.1.3 **Statement of Significance**

The Statement of Significance in the ERA report is unfortunately not relevant to the question of Glen Abbey's significance as a golf course. Instead, it speaks only to the significance of portions of the golf course that relate to the valley and the valley edge.

This limitation is unfortunate given that the opening part, 'Description of the Cultural Heritage Landscape', begins logically enough. It describes the site as having 78 acres of valley lands and 151 acres of table lands. And it correctly identifies the fact that it has evolved through several phases, until its most recent transformation when, in 1976, "the celebrated golfer, Jack Nicklaus, designed the Glen Abbey Golf Club".

The problem is that this evolution, as discussed above, does not make Glen Abbey an *organically evolved* cultural landscape, because its final phase was a transformation by Nicklaus into a *designed* cultural landscape. The Nicklaus landscape defines its *present form*.

The second part, 'Cultural Heritage Value', never addresses this *present form*. It instead limits itself to remnants of earlier phases in the area's development, and related portions of the current layout. The key question - does Glen Abbey have value as a designed cultural heritage landscape - is neither asked nor answered.

This problem of definition makes the third section, on Attributes, not relevant to the discussion of cultural heritage value.

Best practice in the assessment of cultural heritage landscapes begins with choosing the correct category, based on international practice, and the application of this practice within Ontario's regulatory structure.

Appendix II contains notes for a more appropriate approach to a Statement of Significance for Glen Abbey.

IV.2 **OTHER ISSUES AND CONCERNS**

There are some related concerns, particularly in the assessment portion, that reflect the more fundamental issues noted above.

The ERA report applies the Ontario Regulation 9/06 criteria not only to the current golf course, but to the 'Country Club and Ski Hill' era, the 'Estate Era', the 'Jesuit Seminary' era and so on. This is both unnecessary and misleading. These are not the subject of the assessment. Only to the extent that the current Glen Abbey golf course contains remnants of these eras are they relevant.

Nicklaus was aware of these remnants. He retained, for example, the RayDor house and the stables. But he made the conscious decision to isolate them from the key functioning of the golf course, by building a new clubhouse and surrounding the stable area with plantings. This was part of imposing a complete new design vision.

Also, it should be noted that it is incorrect or misleading to keep referring to the valley holes and the 18th hole as having exclusive significance in terms of Glen Abbey's cultural landscape value. The valley holes have high scenic value. The 18th hole can witness dramatic finishes. But as was evident in the recently-completed 2017 Canadian Open, neither golfers nor spectators at Glen Abbey divide the course this way. Every hole has the potential to be dramatic or game-changing. Every hole and every public space is directly related to the Canadian Open experience, and carries Jack Nicklaus' design ideas. Spectator movement is related to this reality.

This is why the cultural heritage landscape concept is important. As set out in the Provincial Policy Statement definition, it is the interrelationships that are critical. The whole is greater than the sum of the parts.

And finally, the contextual significance discussion lacks information about the meanings and associations attached to Glen Abbey, both past and present. These relate to its role in the cultural imagination and sense of identity, both for the residents of Oakville and for the larger national and international golfing community.

V. REVIEW OF THE HERITAGE IMPACT ASSESSMENT

As stated in the Town of Oakville's *Terms of Reference for a Heritage Impact Assessment of Cultural Heritage Landscapes*, such a report is intended to be

"a study to determine the impact of a proposed development on the cultural heritage value of a cultural heritage landscape (CHL) and to recommend an overall approach to the conservation of the resources of that landscape".

It is therefore critical to understand the cultural heritage value before proceeding to the determination of impact.

V.1 FUNDAMENTAL ISSUES

There is an underlying and fundamental issue with the ERA Heritage Impact Assessment. It is based on an inappropriate definition and a misleading assessment, as set out in the Cultural Heritage Landscape Assessment report.

This then leads to a failure to address the key cultural heritage values, against which the impacts are supposed to have been assessed.

The Terms of Reference for a Heritage Impact Assessment, referred to above, list the various components required in the report. These are as follows:

- Introduction to the cultural heritage landscape
- Research and analysis
- Statement of Significance
- Assessment of existing condition
- Description of the proposed development
- Impact of development on heritage attributes
- Mitigation and conservation strategies
- Appendices

The following sections deal with each of these items in turn. For convenience, the first three items are grouped together.

V.1.1 **Introduction, Research and Analysis, Statement of Significance:**

In the ERA report, the first three sections are covered under the Cultural Heritage Landscape Assessment, and are therefore not repeated in the Heritage Impact Assessment.

However, the serious problems with the landscape assessment carry over to the heritage impact assessment. Because of the failure to address the cultural heritage value of Glen Abbey in its *present form*, namely as an internationally significant and active golf course, there is no assessment of the heritage impact on that significance.

This is a serious issue. The whole apparatus of cultural heritage legislation, regulation and policy in Ontario is designed to address the current reality of properties with potential cultural heritage value. The criteria related to physical, historical and contextual significance are meant to identify areas of value as understood by the various communities of interest.

It is worth noting that the Terms of Reference state that the Statement of Significance "will be written in a way that does not respond to or anticipate any current or proposed interventions on the site". This is a further reminder that the question of cultural heritage significance has neither to do with past realities nor potential future realities - it has to do with the present reality.

V.1.2. **Assessment of existing condition:**

This section is very detailed for the buildings, but entirely missing for the landscape.

This is a serious omission, since the landscape is the focus of the Assessment. Its condition assessment is specifically requested in the terms of reference.

As stated previously, the golf landscape - the combination of landforms, water features, plantings, circulation patterns, and so on - is the central feature of the current *designed* landscape at Glen Abbey.

Although missing from the report, it is safe to say that overall the current landscape is in excellent condition. Golf courses, especially tournament golf courses hosting major events, are among the most carefully managed landscapes in the world, with an attention to form, texture and detail virtually unmatched in any other landscape form.

V.1.3. **Description of the proposed development:**

This description is very detailed - more than sufficient to provide a clear basis for assessing its impact. All that is really necessary to know is that the development would essentially erase and replace the current *designed* landscape with a new urban landscape.

V.1.4. **Impact of the proposed development**

The impact of the proposed development is very problematic and highly consequential. It is surprising that only one page in a 238-page report is devoted to this impact. The proposed development undermines both the *authenticity* and *integrity* of the current *designed* cultural heritage landscape - the Glen Abbey golf course with all its "interrelationships, meanings and associations". Ironically enough, it is a new *designed* landscape that replaces it, one with an entirely different vision.

Although brief reference is made in the text to this new "master-planned neighbourhood . . . that incorporates residential, office, and retail components", the actual volume and scale of this new landscape are not spelled out. What is clear, from the perspective drawings, is that this is a complete and irreversible intervention, converting the entire property into new physical forms and interrelationships.

The very first paragraph of this impact section refers to "the removal of the golf course" as if it were a given. And yet nowhere in the report, as noted above, has the cultural heritage value of that golf course - the defining feature of the property - been explored.

Given that the PPS framework for dealing with cultural heritage landscapes specifically defines an inclusive, holistic approach, rather than a component-by-component approach, it is a concern that the impact statement does the opposite - separating the brief discussion into a section on the Valley Lands, then on the Table Lands, and nowhere a section on the two together.

The interrelationships, the meanings, the associations - key characteristics of cultural heritage landscapes as set out in the Provincial Policy Statement - are ignored. This is a significant omission.

V.1.5. **Mitigation and conservation strategies**

As with the rest of the impact assessment, this section does not address the key issue at hand - namely, what mitigation and conservation strategies might be used to sustain the authenticity and integrity of the existing cultural heritage landscape.

For a landscape of significant value, conservation strategies begin with a continuation of its land use, traditional practices, land patterns, spatial organization, visual relationships, circulation, ecological features, vegetation, landforms, water features, and built features. As outlined in the reference documents, these are the components that create the cultural heritage landscape to begin with, and that constitute its key qualities.

In the case of Glen Abbey, the clearest way to implement such a conservation strategy is ongoing use as an 18-hole golf course.

Such a determination would not freeze the golf course in time, but instead allow future changes to be sensitive to the values embedded in the *present form*. If it completely

ceases to be a golf course exhibiting the overall forms and relationships created by Jack Nicklaus, then the *designed* cultural heritage landscape will cease to exist.

The ERA report, in the discussion of mitigation and conservation strategies, bases its comments on two points - a focus on the site's history and natural heritage [rather than its present form] and a focus on the valley and valley edge [rather than the site as a whole]. This is stated in the introductory section, and repeated in the discussion of the "Six Big Ideas For An Evolving Landscape".

The 'Six Big Ideas' highlight the problems with erasing an intact cultural heritage landscape. Hidden in these assumptions is the first, and most critical intervention - removing most of the golf course so that Jack Nicklaus's design survives only as a remnant. Once this has been accomplished, the golf course remnant can be combined with the remnants of all the earlier periods to create a landscape based on commemoration and interpretation. But it is that first, hidden, step that runs counter to the central intent of cultural heritage resource protection in Ontario's regulatory environment.

Greenway Park (Big Idea 1), for example, is said to interpret the "spatial qualities and principles associated with golf course and picturesque park design" - but this after having destroyed a genuine example of this kind of landscape in the process. The description of Greenway Park is particularly ironic as reference is made to a proposed Block 169 park in the midst of a new housing development. This park is described by ERA as follows:

Block 169 takes on a 'dog leg' shape, "which references this common form of golf hole, but also interprets a strategy utilized by Olmsted, most famously informing the design of the 'long meadow' of Prospect Park, where a gentle curve ensures that a view of the entire space is not possible, creating the sense of a larger landscape that unfolds as one moves through it.

Jack Nicklaus was as aware as anyone of the power of Olmsted's work. He loved Augusta National, which was designed by the Olmsted firm in partnership with Bobby Jones. Because of his sensitivity to Olmsted, he was recently asked to redesign the golf course at Olmsted's famous Delaware Park in Buffalo. He designed the 9th hole at Glen Abbey to have exactly the type of Olmsted feature referenced by ERA. As described by DuToit Allsop Hillier in their Views Analysis of Glen Abbey, (see Letourneau Report):

The 9th hole provides the longest water vista along its scene. Planted edges and mounding extend the apparent length of the pond by hiding its end behind trees and landforms, suggesting its indefinite continuity.

In many ways Glen Abbey (with the Jack Nicklaus imprint), is to Canada what Augusta National (with the Bobby Jones imprint) is to the U.S. And both contain clear Frederick Law Olmsted influences. Why would one first erase Glen Abbey, and then consider ways to commemorate it?

Valley's Edge Open Space (Big Idea 2) has a similar interpretive mission. It recalls the Estate Era by adapting parts of the original RayDor estate entrance drive as a trail, and recalls the Glen Abbey era by creating the 'Rolling Fairways', an active and passive recreation space. The RayDor estate drive already plays this kind of vestigial role in the current Jack Nicklaus design, and would not be particularly enhanced in this new iteration. Of more concern, clearly, is the use of a new 'Rolling Fairways' landform to commemorate the culturally-significant landforms erased by the proposed new development.

The Great Belvedere (Big Idea 3) is equally problematic. It is an entirely new construction, and is meant to interpret a "19th Century picturesque park belvedere", a form and a landscape that have never existed on this site. The proposal is that it be set near the existing 11th tee, one of the best-known and dramatic sites of the existing golf course. Along with the water vista at the 4th hole, this is another of the 6 key existing views identified by DuToit Allsop Hillier. There is no clear reasoning for substituting a false memory for a true and culturally-significant component of the existing site.

The Village Market (Big Idea 4) is an adaptive reuse of the stables building. This puts an over-emphasis on the RayDor estate by undermining the Glen Abbey era. Jack Nicklaus had already done an adaptive reuse of this building in his overall design, and that use seems more related to the existing cultural heritage landscape.

The Social Hub and Central Park (Big Idea 5) has several more ironic associations with the golf course being proposed for elimination. The name itself refers to the famous 'hub and spoke' idea of Nicklaus's design. Similarly, a 'wall of champions' and a 'great lawn' commemorate the Canadian Open and the 18th hole - both of which could remain living cultural attributes of the site rather than being first removed and then memorialized.

The Valley Open Space (Big Idea 6) is left aside since a transfer of ownership from private to public is proposed.

The residential, office, and retail components, although not discussed in the ERA report except for the brief mention in the introduction, together form the most important Big Idea. They occupy a majority of the site, they change the site from open green space to an emphasis on built form, they fundamentally alter the ecology of the site and its adjacent neighbourhoods, and, most significantly in the context of a Heritage Impact Assessment, they destroy Glen Abbey in its present form as a cultural heritage landscape of significance.

The golf course was designed to occupy the entire property, and the present boundaries remain as the logical limits to a defined cultural heritage landscape. The interrelationships that define the cultural heritage value encompass the entirety of the site.

Allowing new development parcels along the perimeter, or at random points within the site, would be like allowing new residential, office and retail components to intrude within the boundaries of Olmsted's Central Park in New York City. The cultural heritage value in either case would be seriously jeopardized, even if significant 'remnants' were preserved. New uses might be introduced into the RayDor estate house, or the stables, just as the uses of historic buildings in Central Park evolve from time to time. But overall, a designed cultural landscape is shaped with intent - "at a specific time by a specific person", to quote the Ontario Heritage Trust. And it is understanding this intent, and the physical form it takes, that allows one to assess its value and to evaluate the true impact of proposed developments. This is why Heritage Impact Assessments exist.

Unfortunately, this understanding is not evident in the ERA report, and an assessment of the whole is never made.

VI. CONCLUSIONS

The ERA report provides good historical research, but does not appear to apply cultural heritage landscape categories and criteria in the way envisioned by the Provincial Policy Statement and elaborations on this Statement by the Ontario Heritage Trust or the Town of Oakville.

This is unfortunate, because Glen Abbey Golf Course provides a clear and compelling example of a *designed* cultural landscape with high design, historical and contextual value. It retains very high levels of authenticity and integrity, continuing to serve as a challenging setting for both recreational and tournament golf in tune with its original design intentions.

The cultural heritage field was expanded in a significant way in 2005, with the first mention of Cultural Heritage Landscapes in that year's Provincial Policy Statement. The commitment of the Government of Ontario to the protection of landscapes of significant cultural heritage value is strong and clear.

The ERA report avoids the key question confronting the Town of Oakville, the owners of Glen Abbey, and the various communities of interest. That question is whether the golf course, in its *present form*, constitutes a cultural heritage landscape of sufficient cultural heritage value to be preserved. The answer, when properly assessed, is yes. But the report avoids this question by attributing an incorrect category at the outset, and then further breaking down the site into individual components without ever considering the key issue of their shared value, based on interrelationships, meanings and associations. The heritage impact assessment, in turn, is flawed by never linking future interventions to the present form and its values.

The impact of the proposed development is highly consequential. It would essentially remove the current *designed* cultural heritage landscape, the Glen Abbey golf course, and replace it with a new urban landscape.

If Glen Abbey were a building, designed by someone as notable as Jack Nicklaus, and was considered to be one of that designer's most creative and important works, it would almost certainly be designated and conserved. That idea, of designating privately-owned property because of its cultural heritage value, was new and challenging when first introduced in the Ontario Heritage Act of 1974. Since then the principles behind this legislation have been largely accepted. This is particularly true when people accept the idea of keeping the essential authenticity and integrity of such a building, but allowing those subtle forms of evolution that are needed to accommodate new needs and opportunities.

The Glen Abbey golf course provides a similar opportunity to move forward, but in the newer category of significant cultural heritage landscapes. It is unfortunate that the ERA report does not focus on this opportunity, which is important in a broader historical sense, as well as critical to the debate about the future of this property.

Julian Smith
2017.09.06

APPENDICES

APPENDIX I

NOTES ON ASSESSMENT UNDER ONTARIO REGULATION 9/06

Without attempting to redo the entire assessment, the following comments apply a more holistic and appropriate cultural heritage landscape approach.

1. **Applying the Ontario Regulation 9/06 Criteria:**

As mentioned in the text, it is important to apply the criteria as written - namely, as criteria designed to assess the property as a whole.

This is not only because of this being a designed cultural landscape, and therefore easily adapted to the criteria framework. Whether *designed*, *evolved*, or *associative*, every potential cultural heritage landscape has to be assessed first as a whole, in order to discover whether value exists or not. This is the clear direction in the PPS - components are to be evaluated not in isolation, but together.

Specifically, the following are not consistent with the PPS definition:

- changing "The property has design value" to "The property features component parts or zones which possess design value"
- changing "The property has historical value" to "The property features component parts or zones which possess historical value:"
- changing "The property has contextual value" to "The property features component parts or zones which possess contextual value".

By adjusting the criteria in this way, and applying Regulation 9/06 as intended, the aesthetic, historical and contextual values of the golf course landscape become more evident, and their significance is much easier to identify. The quality of Jack Nicklaus's original design, and the positive associations built up over more than 40 years, highlight this significance.

2. **Assigning equal weight to six different layers in the site's history**

This is an equally problematic approach, given that the present form of the cultural heritage landscape is not the result of this evolution, but rather a *designed* landscape replacing these earlier landscapes and containing only a few surviving remnants.

To start the design assessment, for example, with a discussion of the RayDor Estate is highly inappropriate given the preponderance of the golf course landscape. The remnants of the RayDor estate have been fully integrated into Jack Nicklaus's design, and are now components of that design. This is the starting point for understanding their current design value.

The historical assessment is similarly skewed by assuming equal weight to all eras. In terms of length of commentary, the first Criteria (2.i) has a predominant focus on the RayDor estate era, despite its remnants being a relatively insignificant component of the present property. The second Criteria (2.ii) privileges the RayDor estate era and the Country Club and Ski Hill era, the latter particularly surprising since there are virtually no surviving traces at all. Only a single sentence is assigned to the historical and associative values of the present golf course, despite its having by far the broadest and deepest associative and historical value within Oakville, Canada and internationally.

The same problem is found in the contextual assessment, specifically Criteria (3.ii). The RayDor estate is given far more prominence than the golf course, in terms of physical, functional, visual and historical linkages to its surroundings. Yet it has virtually disappeared as a cultural landscape, and this assessment is meant to be about the current situation. It is also worth noting that particular attention is given to the views from the RayDor estate house into the valley - a feature that has long since disappeared with the plantings that shape the golf course experience.

All these eras carry design, historical and contextual values only to the extent that they survive as remnants in the present form, the Glen Abbey golf course. This is the framework within which they need to be understood. Glen Abbey, after all, is 'the property' being assessed under Ontario Regulation 9/06. And as can be seen, it carries a high level of significance with or without these additional layers of association.

3. **Limiting the value of the Glen Abbey golf course to a few holes and a clubhouse**

This is a repeated theme that seems to be completely unsupported by evidence from players, spectators or the community.

In its most dramatic form, the assertion is made in the very first Criteria (1.i) that the amphitheatre zone of the 18th green and the original portion of the clubhouse are the only components of the course that possess some design value. This is simply not reflected in the comments over the years from professional or amateur golfers, or spectators, or townspeople. There is design value connected with the every hole, and it is the interrelationships, meanings and associations of these components valued together that create the cultural heritage landscape.

Criteria (2.i) asserts that "the valley holes and the amphitheatre-like hub in the vicinity of the 18th hole green are the portions of the property that are directly associated with the Canadian Open." This is a very misleading statement. Every playing surface and every viewing berm is directly associated with the Canadian Open, because they form an integral part of that experience for both golfer and spectator.

Criteria (2.ii) sets out a similar assumption, without evidence: that only the valley holes, and the 18th green, have the potential to contribute to an understanding of the golfing community and the culture associated with spectatorship and competitive golf at the Canadian Open. On the contrary, every part of the golf course has this potential.

The problem comes to a head in Criteria (2.iii), which states: "The valley holes and the amphitheatre-like hub in the vicinity of the 18th hole green are the portions of the golf club which demonstrate and reflect Nicklaus' design ideas." This is simply not true. Nicklaus has spoken extensively about Glen Abbey, and he has made it very clear that his design ideas are reflected in every tee, fairway and green, as well as in the spectator experience not at one hole, but throughout the course. In fact, he has gone to pains to indicate the significance of his design ideas in the tableland holes as much as in the valley holes. He considered the 8th hole, for example, to be one of his best. There is no clearer repudiation of the claims put forward under this and the other criteria mentioned above.

4. **Failure to recognize a craftsmanship or artistic value:**

The claim is made under Criteria (1.ii) that the craftsmanship or artistic value of Glen Abbey is largely attributable to its natural setting. Therefore, the golf course is not considered to display these qualities in and of itself.

This directly contradicts the idea of cultural heritage landscapes, which exist at the intersection of culture and nature. It is recognized that neither one nor the other exists in isolation, but that they can be brought together in ways that become highly valued.

Particularly when talking about designed cultural landscapes, including parks and golf courses, craftsmanship and artistic value always emerge out of a particular way of dealing with a natural setting. If the ERA argument were applied, it would be difficult to assign value to any designed landscape, whether an Olmsted park or an English estate landscape or a Japanese garden.

It is more appropriate to recognize the achievement of Jack Nicklaus in crafting a beautiful course out of a combination of a natural setting and a cultural shaping of that setting.

5. **Failure to recognize contextual value:**

There are two criteria under the contextual category to which ERA assigns no value - its importance in defining the character of an area, and its importance as a landmark.

To address its importance in defining the character of an area (Criteria 3.i), it would seem that the opinion of Town of Oakville residents is the key determining factor. And that opinion is clearly in support of the importance of Glen Abbey in defining the character of both its immediate neighbourhoods and the Town of Oakville itself. This significance comes from its identity not just as open space but as a world-famous golf course.

Although the report admits that the property may support the suburban character of its neighbourhoods, it is probably more accurate to say that it is valued by these communities to differentiate them from the more typical suburban character of other

neighbourhoods. A world famous golf course is not typical of suburbia.

A similar consideration applies to the question of Glen Abbey as a landmark (Criteria 3.iii). It is not possible for ERA to answer this question without reference to the opinions of Oakville residents and the larger golfing community both in Canada and internationally. To use ERA's own definition of 'landmark' from the OED, Glen Abbey is clearly a prominent object in its neighbourhood or district. And in fact this prominence extends much further afield.

It is important to remember that contextual criteria must be based on both the tangible and intangible qualities of a cultural heritage landscape.

APPENDIX II

NOTES ON STATEMENT OF SIGNIFICANCE

As indicated, the Statement of Significance in the ERA report uses a component-based approach, without ever considering the golf course as a whole. This is unusual for any cultural landscape, but particularly inappropriate for a *designed* cultural landscape.

A Statement of Significance for Glen Abbey Golf Course should instead be structured more as follows:

1. **Description**

The intent of the description is to focus on the existing landscape - its use, its form, its boundaries. Instead it focuses on past history and evolution.

2. **Cultural Heritage Value**

The ERA report was intended to address the cultural significance of the current Glen Abbey property. And yet in neither the description nor the section on cultural heritage value do the words 'golf course' appear.

This is unacceptable for a cultural heritage landscape when the present form - as a functioning golf course - retains both a high level of authenticity and integrity, within a defined geographical area whose boundaries have remained essentially unchanged since it was first designed.

The authenticity of Glen Abbey is underscored by its ongoing use for both tournament and recreational golf, reflecting its original design intent. Its integrity is underscored by the fact that only minor alterations have been made since its inception, and Jack Nicklaus himself has consulted on many of these changes.

The cultural heritage value of Glen Abbey, therefore, is more appropriately expressed in ways that highlights these qualities. Mention should be made of how cultural heritage value emerges from the pioneering quality of the golf course design, the significance of the course in relation to the stature and career of Jack Nicklaus, the unique nature of its association with the Canadian Open, the connections it has with some of the most prominent figures in the international golfing community, and the importance of its role as a defining feature of the Town of Oakville. References to earlier layers is relevant primarily to the extent that the golf course responded to and incorporated some of the existing features, including not only built features but the unique qualities of the valley and table lands.

It then needs to be pointed out that this cultural heritage value is enhanced by the high degree of authenticity and integrity.

3. **Attributes**

The ERA report does not provide either general or specific attributes that relate to the overall *designed* cultural landscape. Instead, these sections focus on particular valley and valley edge components.

This section identifies, as its very first attribute, "the layered and evolving character of the landscape, reflecting different patterns of use by numerous social and cultural groups over time; uses have included cultivation of land for agricultural purposes, habitation, recreation, and public gathering".

The current cultural landscape is neither strongly layered nor evolving. The agricultural and private habitation landscapes have been almost completely replaced, and the current landscape of golf is not evolving in any significant way. There are associations with earlier layers through some of the remnant pieces, but these too have been consciously integrated into the new design.

These problems continue with the other attributes, most of which have very little to do with the landscape's current form and use. The remnants of the RayDor estate, highlighted in attributes such as the siting and views of the stable building, are not prominent elements for most visitors to the site. They retain some remnant significance but within what is now a larger context.

No evidence is given for the choice of attributes. The Oakville community, and the local and international community of golfers, are important voices in identifying Glen Abbey's attributes. For the most part, these are people who experience the golf course as a single, designed entity.