

via email

July 13, 2023

City of London  
300 Dufferin Street  
London, ON  
N6A 4L9

**Attention: Mayor and Councillors City of London**

**Mr. Scott Matthers, P. Eng., Deputy City Manager  
Planning and Economic Development**

**Re: Zoning By-law Amendment Approval  
599-601 Richmond Street – 12 Storey Mixed-Use Apartment Development**

Dear Mayor, Councillors and Mr. Matthers:

The 12-storey mixed-use commercial and residential apartment proposal brought forward by Westdell Development Corp., on behalf of Richmond Res Corp., builds upon the earlier approved 8-storey mixed-used commercial and apartment proposal (Z-9367) for 599-601 Richmond Street. The 8-storey proposal was processed by City Planner, Alanna Riley RPP MCIP; however, Alanna did not process application for the 12-storey proposal.

The 12-storey proposal would see an increase in building height of 4 storeys and 36 additional units being provided on the subject lands which are within a Protected Major Transit Station Area (PMTSA). While the currently requested Zoning By-law Amendment would by default remove the previously granted zoning including the bonus zone, Westdell remains committed to affordable housing previously agreed to, the preservation and maintenance of the existing heritage buildings, and increasing housing supply in the City of London.

In keeping with the previous bonus zone which was granted for these lands, our promise of affordable units will remain the same, and we will execute the protective and mitigative measures recommended by the Heritage Impact Assessment (HIA) for the existing heritage buildings which will be preserved. As noted in the HIA and supported by the respective Planning Justification Report (PJR) there are no anticipated impacts with respect to the planned change in land use.

While supportive of the 8-storey proposal which was approved by Council, City Planning Staff have recommended refusal of the 12-storey proposal on the basis on over-intensification. However, no substantial evidence has been presented that this proposal would be unsuitable for the site or incompatible with surrounding land uses. Further, staff have made assertions that are inconsistent with previous decisions related to the 8-storey proposal. For example, City Transportation Staff has blatantly stated (without rationale) that the planned lay-by along Central Avenue cannot be supported for the 12-storey proposal, although the said lay-by is identical to the lay-by for the 8 storey proposal.

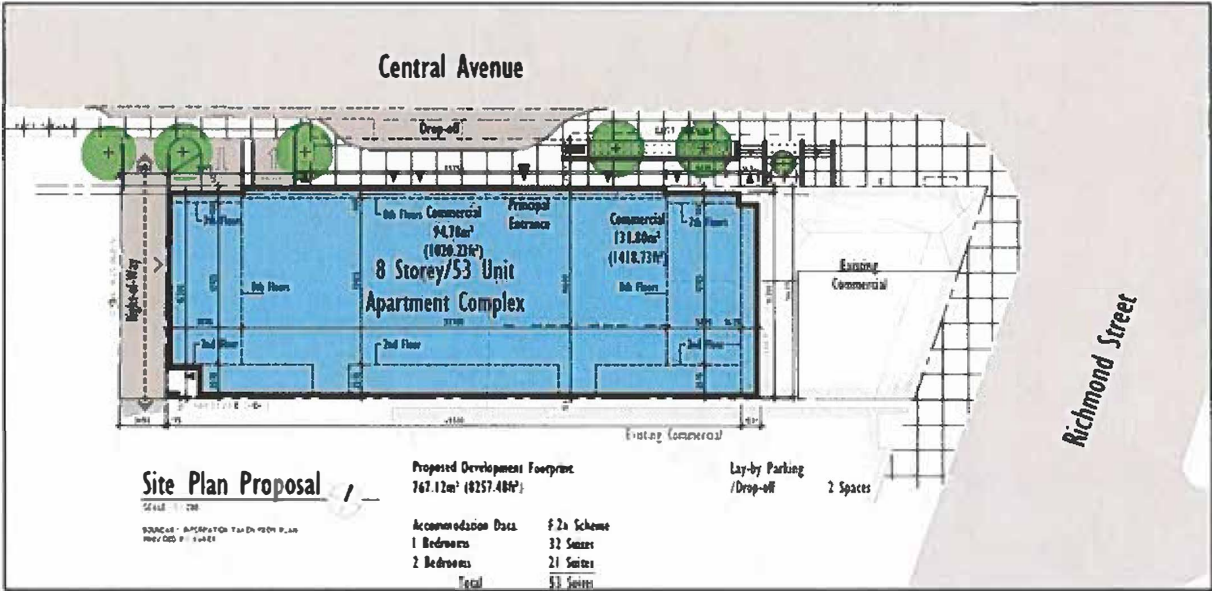


Figure 1: Site Plan for 8-Storey Proposal

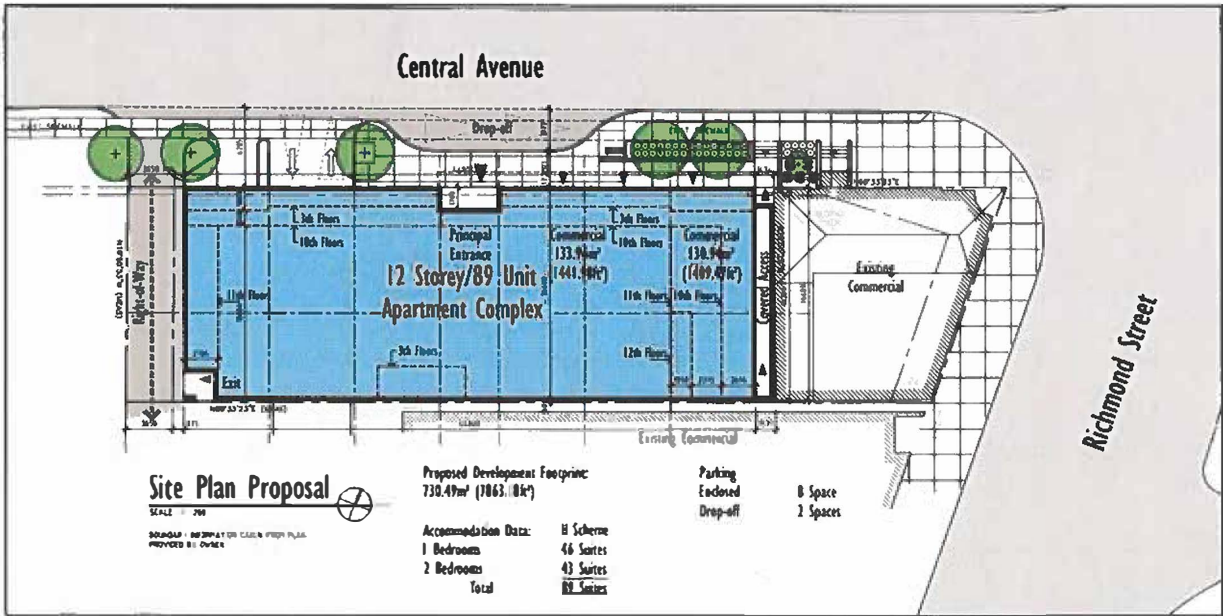


Figure 2: Site Plan for 12-Storey Proposal





Figure 3: Rendering of 8-Storey Proposal



Figure 4: Rendering of 12-Storey Proposal

As stated by the previous Director of City Planning in his report to Council recommending the adoption of PMTSA policies in the London Plan:

*“The proposed amendment to add PMTSA policies to the London Plan maintains the existing vision, values, and key directions for London while gaining the benefit of the PMTSA designation from the Planning Act...”*

*preferred land uses around transit stations or stops include: institutional uses; entertainment uses; high density employment uses; social services; recreational facilities; retail uses; and medium to high density residential uses, particularly affordable or social housing*

***The PMTSA policies will support the future implementation of the rapid transit and accommodate increased demand for intense, urban communities in a way that can be supported by higher order transit service”***

Outside of PMTSA policies, the view of over-intensification is not consistent with nearby surrounding development in the Downtown and central London. Pictures of the subject site and surrounding land uses are provided below for context.



Figure 5: Subject Lands and Lands to the South



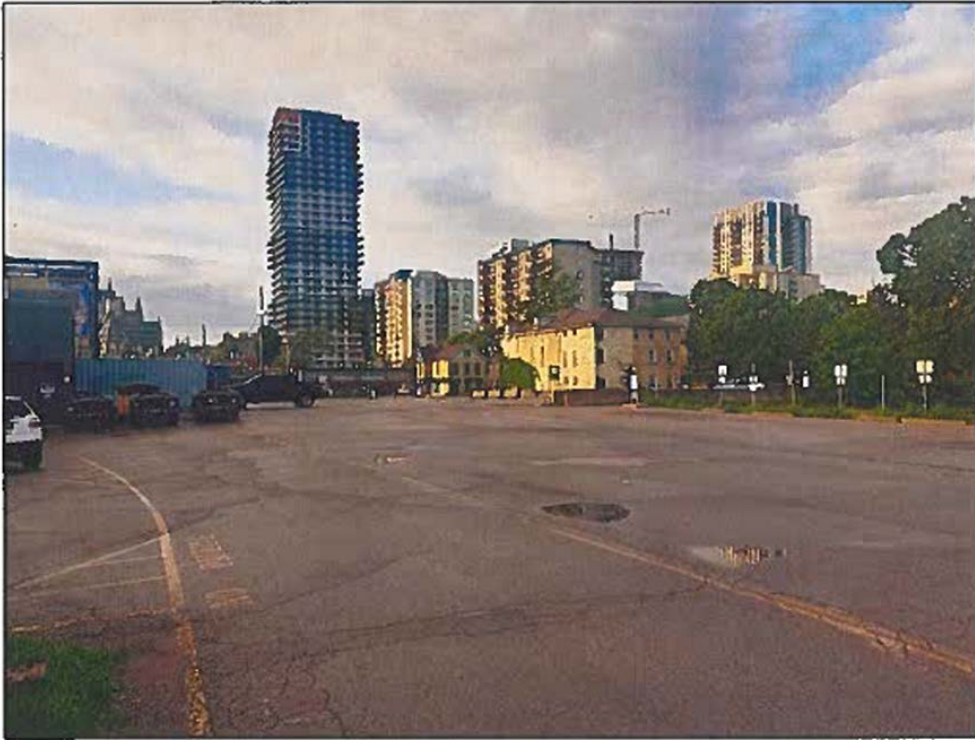


Figure 6: Lands to the South

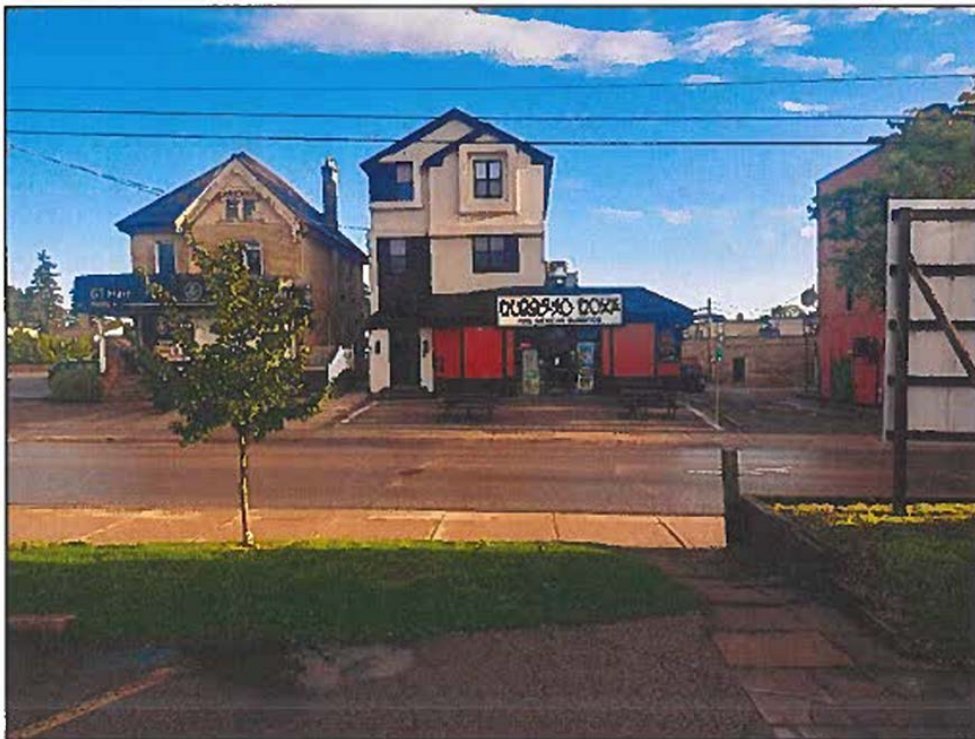


Figure 7: Lands to the North (Commercial Buildings)



Figure 8: Lands to the North (Surface Parking Lot)

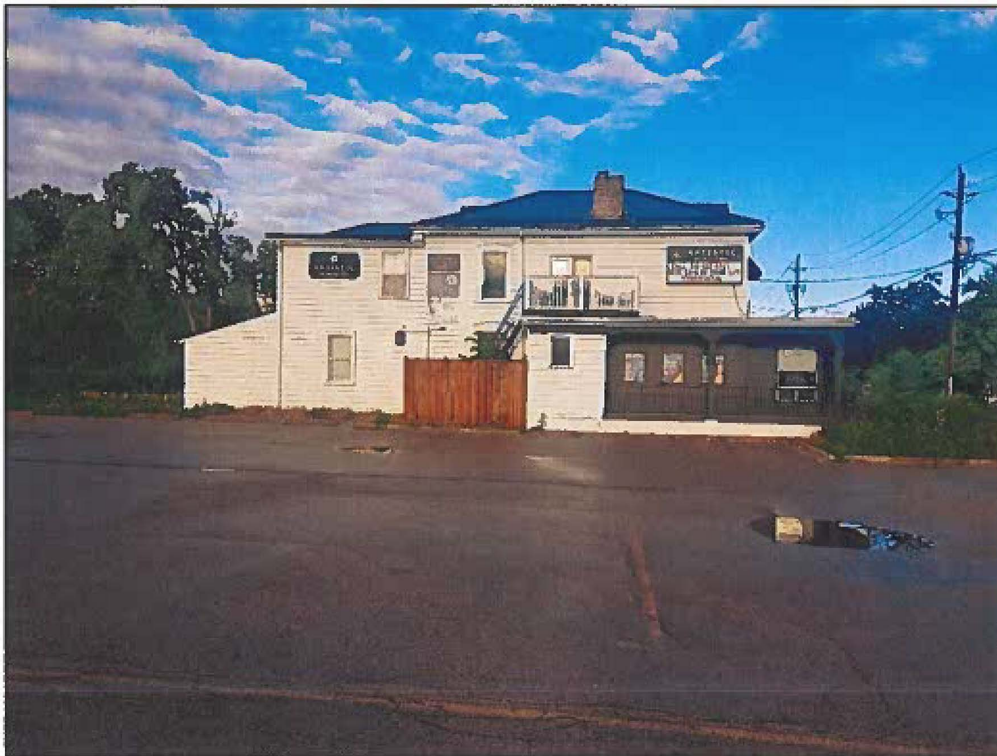


Figure 9: Lands to the West (Commercial Building - Spa)



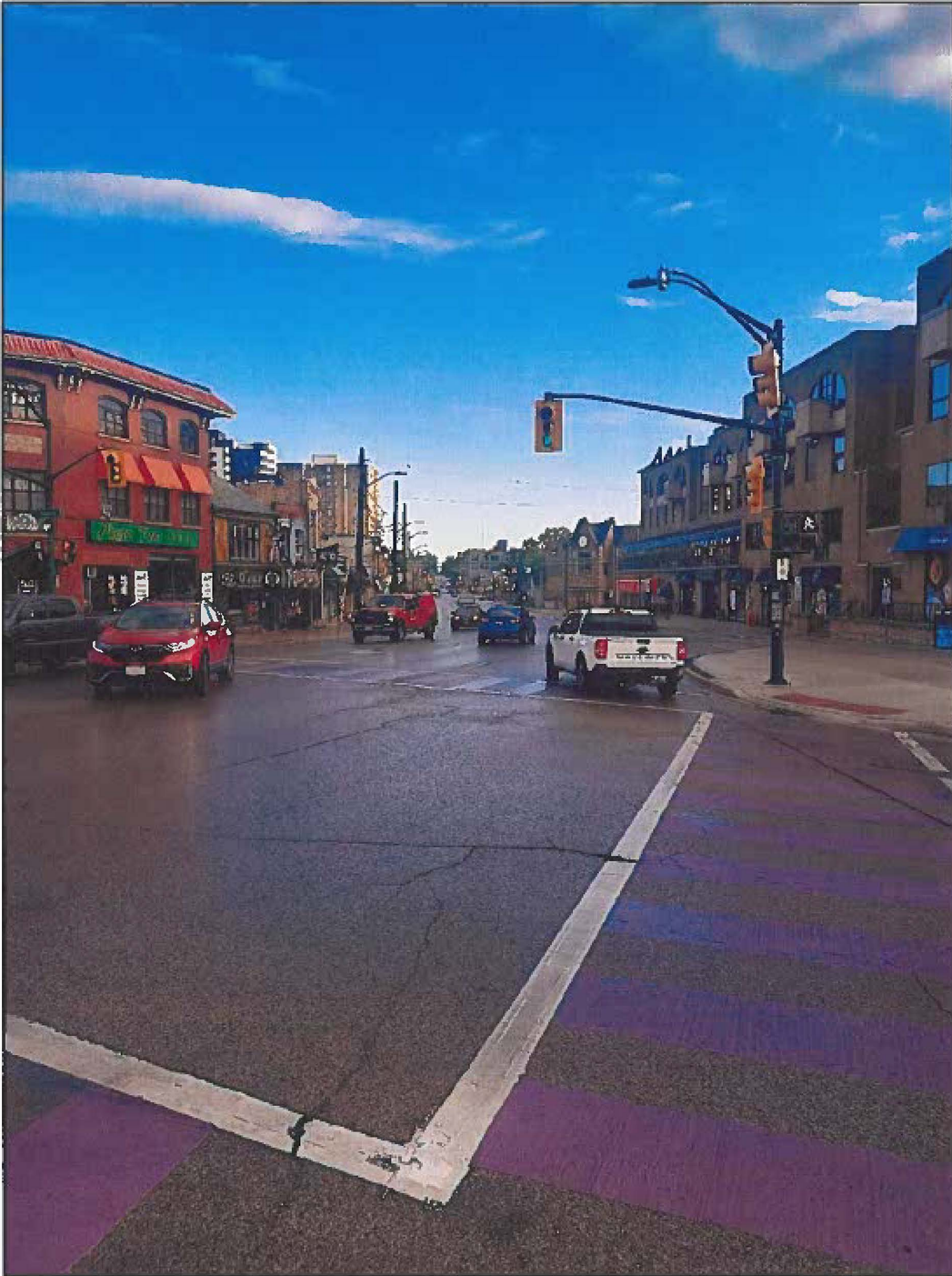


Figure 10: Richmond St. Streetscape (North View – Central Ave and Richmond St Intersection)



Figure 11: Richmond St. Streetscape (South View – Central Ave and Richmond St Intersection)

It should be noted that the previous zoning approval was challenged at the Ontario Land Tribunal (OLT). However, the Tribunal dismissed the appeal given no evidence could be found that the Zoning By-law Amendment for the planned apartment building had failed to meet applicable provincial or municipal planning and development policies or guidelines. As illustrated in the figures above, the location of the 12-storey proposal is both logical and suitable, and respectful of surrounding development. There is an existing 10 storey apartment building at Talbot Street and Central Avenue.





Figure 12: Google Earth Image of Talbot Street and Central Avenue Area



Figure 13: Apartment at Southeast Corner of Talbot St and Central Ave (600 Talbot St)

Also, the proposed development would not be as intense as previously approved residential developments along Wellington Street that abut the Woodfield neighbourhood and Victoria Park. One

such development is the "QV on the Park" – a 17 storey high-rise residential apartment building at 560 and 562 Wellington Street.

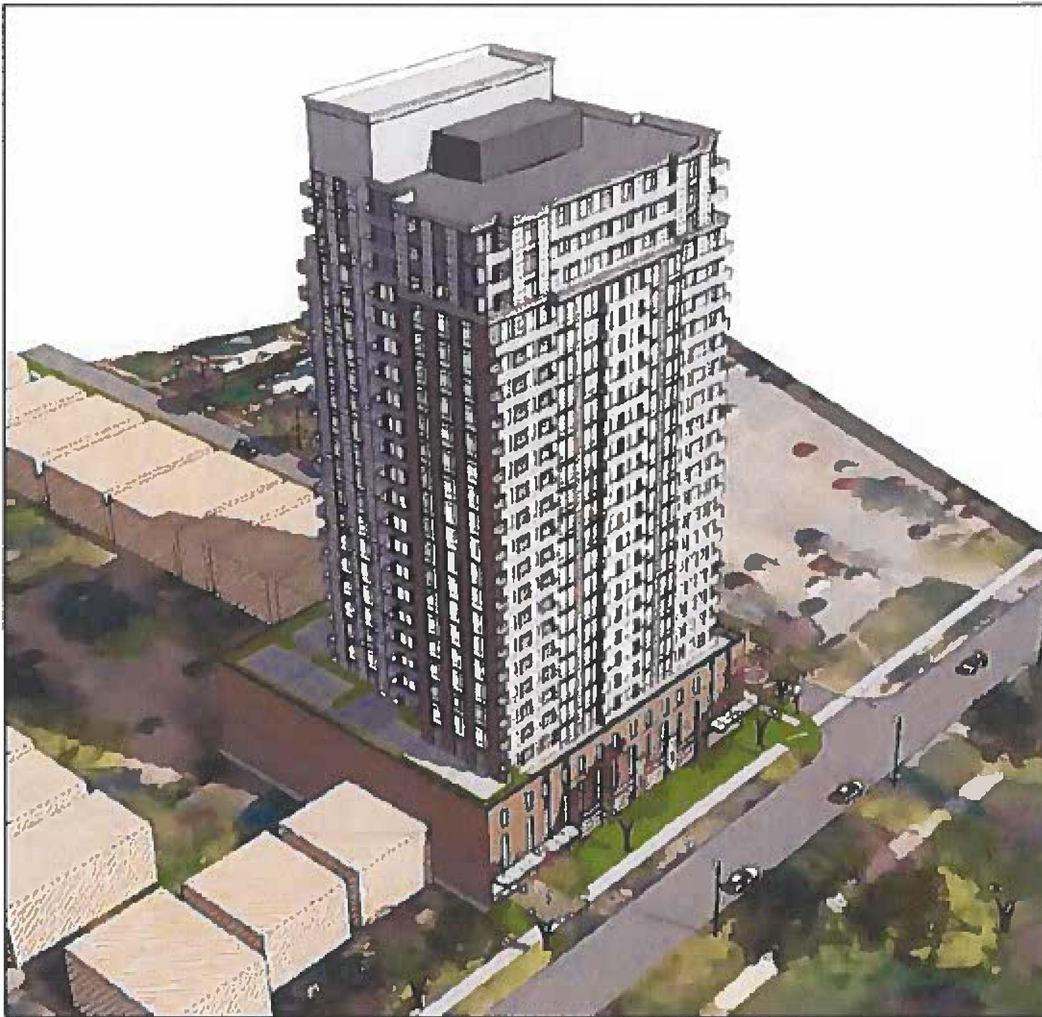


Figure 14: Illustration of the Planned Development Approved at 560- 562 Wellington St (Auburn)

In addition to the above examples, there are multiple examples throughout the City where mid-rise and high-rise apartments are developed adjacent to low-rise residential subdivisions dominated by single-detached dwellings. Examples of these developments are provided below:



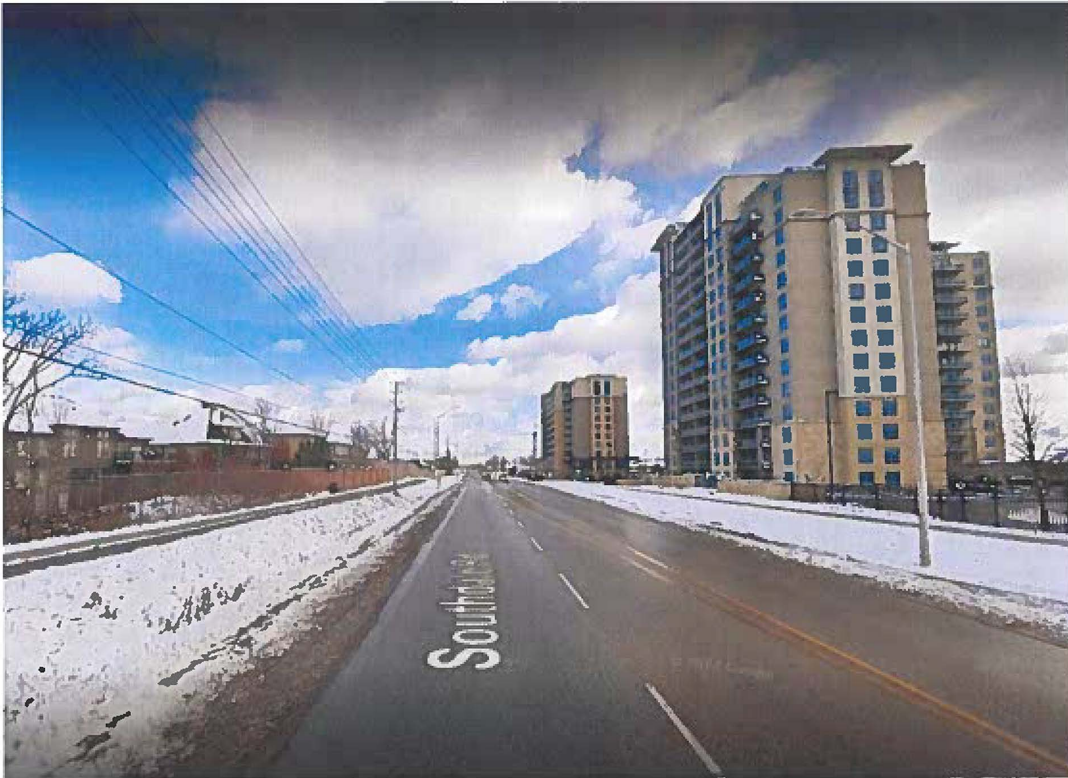


Figure 15: Pomeroy Place Apartments, 905 Southdale Rd W (Old Oak Properties)



Figure 16: Hyde Park Place II & III, 1605 Dyer Dr (Old Oak Properties)



Figure 17: Village North II, 260 Villagewalk Blvd. (Tricar)

We appreciate your consideration and review of this matter and hope to have your support for the proposed development which:

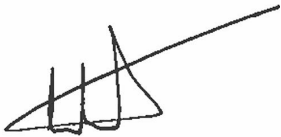
- 1) helps meet PTMSA's goals and objectives;
- 2) has no anticipated negative impact on surrounding (predominantly commercial) land uses;
- 3) is suitable and logical use for the subject lands;
- 4) is at a scale and height that is appropriate for its location;
- 5) contributes desirably to housing supply and the provision of attainable housing;
- 6) will preserve existing heritage buildings;
- 7) will maintain its previous commitment to affordable housing units; and
- 8) is an innovative and attractive mixed-use commercial and residential apartment development.



Should you have any questions or require further information, please do not hesitate to contact us. We look forward to hearing you.

Thank you.

Sincerely,  
**Westdell Development Corporation**

A handwritten signature in black ink, appearing to read 'Lyman Meddoui', with a long horizontal stroke extending to the right.

**Lyman Meddoui**  
**President, Westdell Development Corporation**