

Please place on the PEC agenda. Thank You

Dear Members of Council,

There is growing concern regarding Councillors who only view the 'core' area as a place of business and continually ignore concerns of the residents that actually live there. Comments made at Committee and Council also reflect decisions that are not thoughtful or well informed, and this is causing a lot of concern that some Councillors are pushing a narrow business agenda at the expense of neighbourhoods. It is as if residents don't matter.

There is good reason to refuse this application. In addition to all the policy reasons cited by staff, residents are concerned that this sort of development is not respectful and oblivious to its impacts on the area neighbourhood. They are a bad neighbour, and good development is one that enhances an area.

Below are good reasons why this development is viewed as negative to the North Talbot Neighbourhood. But perhaps more importantly, the city's expensive plan to alleviate homelessness is bound to fail because Council continues to ignore the root causes of homelessness and residents are becoming hardening to paying for bad ideas that clearly will not solve the problem. The problem being that this development does not offer a range of housing options and affordability. It is being marketed exclusively to a specific demographic with a specific income. And it is this kind of development that is making housing unaffordable and exclusionary. It is unrealistic to expect that residents can continually build affordable housing for the steady stream of homelessness individuals. It is your responsibility to ensure each new housing offers a range of affordability.

Again, people are growing weary of Councillors with a business agenda at the expense of neighbourhoods.

Al Faez Real Estate Corp., which owns the property, is resubmitting a new development proposal under Bill 23 at 599-601 Richmond Street. It is now a 12 storey building, with 89 units being shoe-horned into a property that is approximately 7 car lengths long and 3 car lengths deep. It is proposing to cut away the only green space in that section of the street - the boulevard, and is hostile to children and families as the units are primarily compact 1 bedroom and 2 bedroom units with no green amenity space. It is expensive, exclusionary housing that is already over represented in the North Talbot neighbourhood.

In North Talbot, renters are being charged approx. \$1400 PER ROOM in student housing. Therefore, these new units are not likely to be affordable. That is not what this neighbourhood needs.

We understand this development is an infill project and as such is very desirable. The North Talbot Community is supportive of infill development; however, overarching and neighbourhood specific policy is often ignored in favour of higher densities. We are asking that you please consider these more specific policies applicable to this site. We are asking for a building that is compatible with the neighbourhood and does not contribute to negative outcomes resulting from over intensification in **near campus neighbourhoods.**

Policies include: London Plan (OP) for Neighbourhood Type Policy, Main Street Commercial and the Near Campus Neighbourhood Policy (NCN). For example, the neighbourhood description in the **first staff report** was limited to the buildings on the corner of Richmond Street and Central Ave., but in Official Plan the intent of the applicable policy describes neighbourhoods beyond the adjacent properties.

The NCN is a unique policy specific to neighbourhoods that are experiencing over intensification of single use housing, specifically, exclusive temporary housing that has unintentionally resulted in *people zoning* and a decline in housing diversity. A collection of intensification through minor variances, sub-divisions of single family homes and oversized parking lots has resulted in a deterioration of the neighbourhood's character. These neighbourhoods are potentially unbalanced because of dwindling long term residents. Through zoning and policy, the NCN seeks to alleviate the pressures of over intensification by limiting bedrooms per unit, oversized parking areas and reviewing minor variances against the overall neighbourhood.

Residents have become acutely sensitive when planning decisions ignore the intent of the OPs. The City of London has adopted a specific and unique policy to help address declining housing options and neighbourhood character in near campus neighbourhoods, yet the policies are inconsistently applied to infill projects.

This development is physically located on a residential street at the addresses 205 and 193 Central Avenue according to the City of London Roll #. The four nearby peripheral businesses are within historical houses on the residential street. The new building sits behind an elongated lot fronting the commercial corridor of Richmond Street (599-601), but the building itself is not on Richmond Street.

On Richmond Street, older facades have no setbacks, but newer development does have setbacks. New mixed use buildings have setbacks. On Central Avenue all existing businesses have setbacks, which comply with the planning objectives for this area.

Talbot Mixed Use Area

Central Avenue

1. iv) The lands fronting onto the north and south side of Central Avenue, between Talbot Street and the Richmond Row Commercial District, are appropriate for the development of a mixed-use corridor with a low profile which provides a transition between the higher intensity uses to the south and the lower intensity uses to the north. In addition to the uses provided for under either the Multi-Family, Medium Density Residential or Multi-Family High Density Residential (192-200 Central Avenue) designation, new buildings or the conversion of existing buildings, or portions thereof, to uses such as office, financial institution, personal service, retail business service or eat-in restaurant uses may be allowed. It is intended that conversions shall maintain the form and external appearance of the building. New buildings will be encouraged to adopt a residential style. Limitations will be placed on signage, location of parking areas and additions to buildings. The consolidation of off-street parking at a location that is peripheral to this area shall be encouraged.

Neighbourhood Character Statement

An inventory of the urban design characteristics of the structures and the natural environment within a neighbourhood should be undertaken by the applicant and planning staff. The physical environment of the neighbourhood, composed of its lots, buildings, streetscapes, topography, street patterns and natural environment are some of the elements that collectively determine much of the character of a neighbourhood and its streetscape, and the 'neighbourhood' is not just the corner of Central and Richmond. That is selective bias.

A well organized and documented understanding of a neighbourhood's character is an effective tool in assessing the appropriateness of a proposed change and the implications the change may have on the character of a neighbourhood. **Planning staff ignored our concerns initially. Our concerns were shared by the city's heritage planner, and they too were tossed aside.**

The Heritage Planner made this comment in her initial report:

"More carefully consider form and massing of the new development in relationship to the existing heritage building on site on the subject property, and the streetscape along Central Ave."

As part of an application for residential intensification, planning staff should require an adequately detailed statement of the compatibility, where it is clearly demonstrated that the proposed project is sensitive to, compatible with, and a good fit within, the existing surrounding neighbourhood based on, but not limited to, a review of both the existing and proposed built form, massing and architectural treatments of the surrounding neighbourhood.

Central Avenue: within a 100 metres from the planning site. Photos taken on Jan. 12 2023.

South side from east to west:





North Side from east to west:





Existing highrise development on Talbot St. to Kent St. All these buildings have setbacks and green amenity space.



600 Talbot St.



City Planners completely ignored policy that applies to this site in the London Plan, such as:

LONDON PLAN

Even though it is acknowledged that small scale businesses will wrap around into the edges of residential streets, the objective is to direct businesses to the main commercial corridor.

APPLICATIONS TO EXPAND THE MAIN STREET PLACE TYPE

912_ Expanding the Main Street Place Types, beyond their current size, could negatively impact a number of important goals for recognizing, infilling and strengthening existing main streets, and will be strongly discouraged. However, in the event that an expansion of a Main Street is proposed, the following criteria will be considered together with all the policies of this plan.

1. The potential for an inappropriate intrusion of the Main Street function into an adjacent residential neighbourhood.

NEAR CAMPUS NEIGHBOURHOODS

In the Near Campus Neighbourhood Policy it states: page 259 -260

968_ Residential intensification or an increase in residential intensity, as defined in these policies, may be permitted in the Neighbourhoods Place Type within Near-Campus Neighbourhoods only where it has been demonstrated that all of the criteria listed below have been met.

1. The development conforms to the Residential Intensification policies of this Plan, where those policies do not conflict with Near-Campus Neighbourhoods Policies.
2. The development conforms to any relevant Specific Policies of this chapter.
3. The development provides for an adequate amenity area that is appropriately shaped, configured, and located.
4. The proposal establishes a positive and appropriate example for similar locations within the Near-Campus Neighbourhoods areas.

969_ For lands in the Neighbourhoods Place Type that are located within Near-Campus Neighbourhoods, the following forms of intensification and increased residential intensity will not be permitted:

1. Development proposals that are inconsistent with the uses and intensity shown in Tables 10 to 12 of this Plan.
2. Developments within neighbourhoods that have already absorbed significant amounts of residential intensification and/or residential intensity and are experiencing cumulative impacts that undermine the vision and planning goals for Near-Campus Neighbourhoods.
3. Residential intensity that is too great for the structure type that is proposed.
4. Proposed lots and buildings requiring multiple variances that, cumulatively, are not in keeping with the spirit and intent of the zoning that has been applied.
5. Inadequately sized lots that do not reasonably accommodate the use, intensity or form of the proposed use due to such issues as:
6. A lack of on-site amenity area.
7. Inadequate parking areas to accommodate the expected level of residential intensity.
8. Built forms that are not consistent in scale and character with the neighbourhood, streetscape and surrounding buildings.

PLANNING GOALS FOR NEAR-CAMPUS NEIGHBOURHOODS pg. 258

965_

1. Utilize zoning and other planning tools to allow for residential intensification and residential intensity which is appropriate in form, size, scale, mass, density, and intensity.
2. Ensure that residential intensification projects incorporate urban design qualities that enhance streetscapes, complement adjacent properties, and contribute to the character and functional and aesthetic quality of the neighbourhood.
3. Conserve heritage resources in ways that contribute to the identity of streetscapes and neighbourhoods, in compliance with the Cultural Heritage chapter of this Plan.
4. Encourage affordable housing opportunities.
5. Ensure intensification is located and designed to respect the residential amenity of nearby properties.

Special Planning Areas – Primary Transit Area (The London Plan, Policy 90_).

The subject site is located within the Primary Transit Area (“PTA”) which will be a focus of residential intensification and transit investment within London (The London Plan, Policy 90_). The PTA has specific Zoning By-law regulations to ensure that the scale of intensification is compatible and sympathetic to the existing neighbourhood character.

Urban Forest Strategy

The City of London is struggling to meet its obligation under the Urban Forest Strategy and Climate Action Plan. City Forestry Staff has concluded that there is no more public land for tree planting, and competing planning policies for mixed use buildings is removing private land for tree planting through reduced setbacks. Therefore, it becomes increasingly important to review all applicable policy in new development plans to ensure one policy is not cancelling out another.

9th Meeting of the Trees and Forests Advisory Committee

November 24, 2021, 12:15 PM

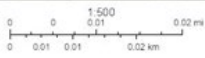
1. On-going Loss of Street Tree Planting Spaces The city is running out of vacant sites for trees on existing streets. Street trees are very important as they define community character. In addition to all their environmental benefits, street trees provide shade to pedestrians and can extend the lifespan of the asphalt roads. The city has planted most of the planting spaces identified through a recently completed tree inventory. In the process of creating annual planting plans, the city notifies residents via letter of the upcoming tree planting. Residents have the option to “opt out” and reject a street tree outside their home, even if one was there before. Over the past few years, this trend is increasing to as much as a 20% of the total tree planting numbers annually and has a cumulative impact. Private Land Approximately, 90% of tree planting opportunities are located on private lands. Encouraging tree planting on private land has the greatest impact to affect tree canopy cover goals.

The North Talbot Community is losing tree canopy at an alarming rate due to over intensification. Residents are adamant that new residential buildings, whether mixed-use or not, contribute to the character of the neighbourhood through architecture and green space.

London City Map



1/29/2022, 5:16:57 PM



London City Map



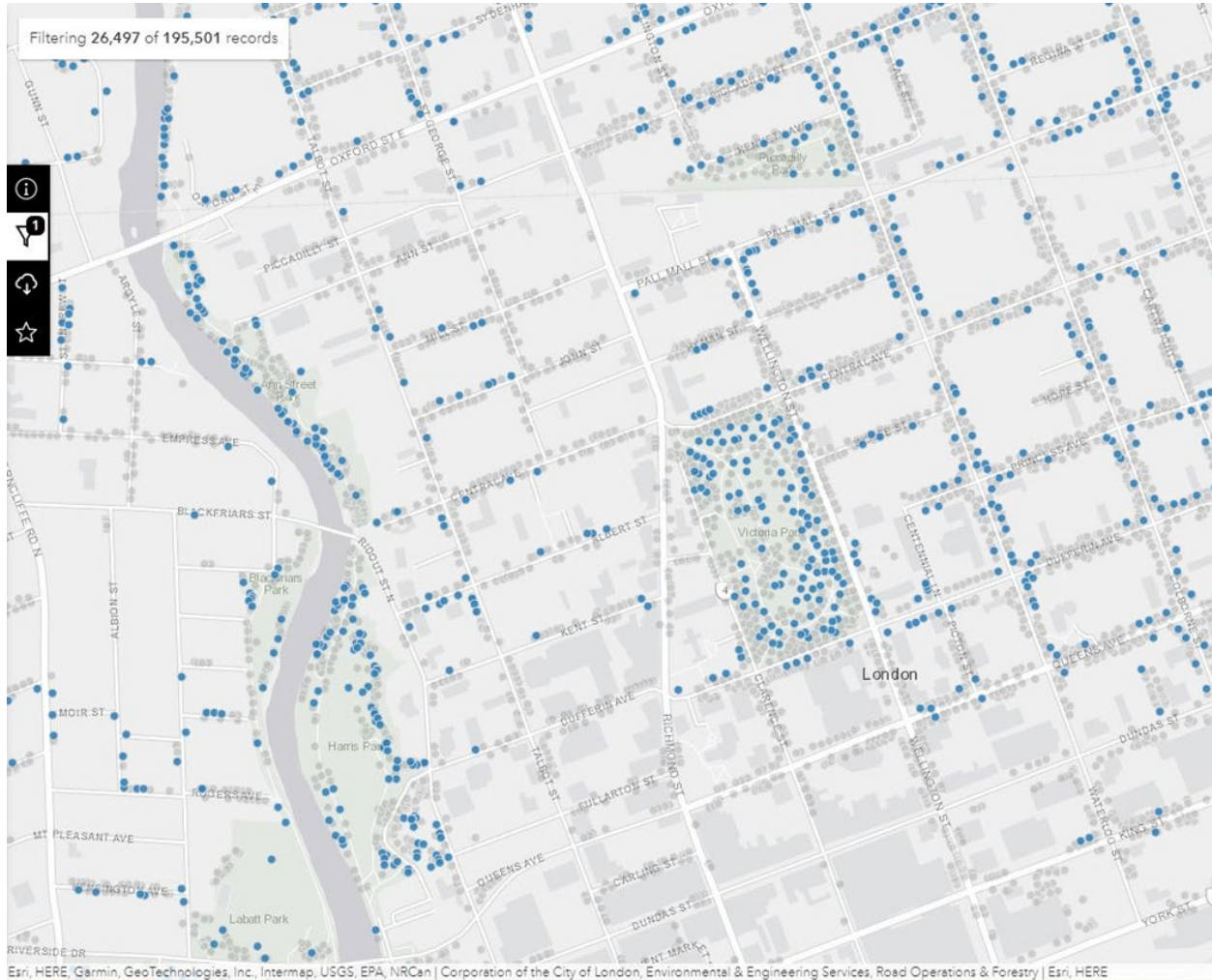
Corporation of the City of London (Produced For: Environmental & Engineering Services - Solid Waste) (Produced by: Environmental & Engineering Services - Parks & Transportation (Geomatics))



The map below was chosen to show street trees in North Talbot that can be considered canopy or mature shade trees at 50 centimetres in diameter and protected under the Tree protection By-law. It is these trees that provide shade, enhance walkability, and contribute to neighbourhood character.

North Talbot Community located between the Thames River to the left and Richmond Street to the right.

City Trees at 50 centimetres in diameter - within the Tree Protection By-law - 2019



While the last council approved this development simply because it was an infill development, we are asking, that this time, planning staff and City Council uphold city policy and respect neighbourhood concerns. Asking that infill projects preserve neighbourhood character, offer a diversity of housing including housing suitable to children, and expand green amenity space is the foundation of healthy resilient neighbourhood. This is a reasonable request.

Sincerely,

AnnaMaria Valastro