

My name is Drew Smith, I live at 2151 Blackwater Road. My family has lived in this subdivision 10 years this November, we were one of the first ones to build in this subdivision.

I am here tonight to do a presentation to show you why the amendment to the Zoning By-law for the subject lands at 2250 Blackwater Road and 660 and 670 Garibaldi should not be allowed to go through and why Drewlo Holdings should not be able to build their 3 6 storey buildings on these lands.

When this zoning change was first distributed to our neighbourhood there were a few of us that got together to discuss what could be done regarding this proposed change. Out of this group we did start a petition. From this I have been nominated by a few residents in our neighbourhood to do this as one presentation on behalf of our small community.

Looking at the report prepared by the Planning department, they are recommending that this amendment change to the zoning go through. The only reason why this zoning is up for amendment is because Drewlo Holdings wants to build three apartment buildings at a height of 18m, 6 storeys each. When I look at this proposal and what Drewlo wants to do I am looking for a reason **why this has** to be done. What is here that is **specifically stating** that a 6 storey apartment building has to be on these lands instead of 4 storey apartments or townhouses. I do not see anything. On the second page of this report there are listed 5 points as rationale as to why the zoning change should happen and subsequently the 6 storey apartments be built. The points made are consistent whether you keep the existing zoning and build townhouses or 4 storey apartments, whether you change the zoning and do 6 storey apartments, and a couple would even apply if you were to build a 24 storey apartment building. If I read this without knowing its purpose I could take it any way. There is **no** specific rationale that states why 6 storey apartments have to be here. I argue that the 2nd point is not valid. The second rationale is stating that this amendment is in conformity of the Multi-Family, Medium density Residential policies of the city's Official Plan and provides a compatible transition from existing developed areas to planned uses for surrounding area. Medium Density is set at 30 – 75 u/ha, high density is 75 – 150 u/ha. Changing the zoning puts you at the extreme end of the medium density

setting **and** in the low end of the high density. How does going from existing low density housing to low end high density zoning giving any transition, it doesn't it is a jump! As for the surrounding area the lands to the north have not been zoned yet, they are still currently UR4 and ER, there is not a 100% set planned use yet, it is not known what will actually be here. The commercial block referred to in this report and other Drewlo documents is very small and only contains 1 floor units including a Tim Hortons, a gas station and lube shop car wash. The lot east of Adelaide is zoned commercial but it too is small and has not had any development for 10 years either. The land at the north east corner of Adelaide and Sunningdale is zoned as UR and there are no current applications for it that I can see. Going to the extreme end of medium density will not offer any transition to surrounding areas.

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On these pages there are some numbers given regarding the number of houses and the number of people that have responded to this proposed change and development. These numbers are incorrect and do not reflect the accurate numbers of our community. The Planning department when determining there are 257 houses is looking at the original plan submitted to the city in 2004. At the bottom of page 12 the very last line lists Grasslands Way, Okanagan Way and Firefly Dr. however these streets are on other side of the ravine which borders our community to the west and southwest and have nothing to do with the subject site and our little community. The actual number of houses in our community is 205. This can be verified from page 5 in the report for Aug 9, 2002 where there are 144 houses on Blackwater, Clearwater and Garibaldi and from Aug 26, 2004 61 houses on the northern Garibaldi and Kokanee. This number is also stated in the Transportation study provided by Drewlo on page 3 section 3.2. As for the number of respondents the report cites 136 total, 17 by phone, 48 by written document and 158 by petition. 136 is **not** correct. Looking at the back of the report from pages 27 – 32 there is a list of all the people in the community that have done some type of response to the city. Except for Stan Brown each line represents 1 household, counting every line on these pages I come up with 176 respondents. Using 176 respondents in a neighbourhood of 205 houses this makes for more than 85% response rate of people opposed to this change in amendment and building of the 6 storey apartments. In conversation with Amanda Watson

at the Planning department she told me that usually they would see a couple respondents, may 5 or 6. The volume they received was astounding.

To add some impact to these numbers and to give a sense of the feeling our community has against the proposed change. I had the honour of taking the petition and presenting it to houses on Blackwater. It was not a simple here is a petition please sign and a thank-you and leave. Every house was a minimum 10 minute conversation, 15 – 20 minutes usually. I even had people going down the street looking for me to sign it, a couple sat in their car waiting for me to finish at a house, another gentleman waited on the sidewalk later on. That is how passionate and opposed our community is to this development.

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Provincial Policy Statement

The last 3 paragraphs are stating how this zoning change and proposed development by Drewlo will meet the guidelines. Again the statements made can be applied if you are building townhouses, low rise apartment buildings or 6 storey apartment buildings. There is nothing that state why the 6 storey apartment buildings should be done over 4 storey buildings and why the zoning of these lands needs to change.

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Paragraph under 3.1.3 Multi-Family, Medium Density Residential

Objectives which is referring to the city's Official Plan, there is an excerpt from the plan noted and an interpretation. The Plan does direct that multi-family medium density designation permits multiple-unit residential developments with densities exceeding those of Low Density Residential (30 u/ha) but does not approach the densities intended for the Multi-Family High density designation - and they have noted this as 150 u/ha. This interpretation is stating the max number of u/ha for high density, which is 150 u/ha. The actual range for high density is 75 – 150 u/ha, if the Official plan directs that multi-family, medium density should **not** approach the density of Multi-Family High density then why is this amendment application aiming for 75 u/ha? Is that not going against the Official Plan directive as that is also the low end of the high density rating?

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Section 3.3.3 Scale of Development

- This statement mentions “development within areas designated multi-family, medium density residential shall have a **low-rise** form and site coverage and density that could serve as a transition between low density residential and more intensive forms of commercial and high density.”
- This statement to me is covering the low end range of medium density and not the extreme high end as it provides a nice easy transition to the surrounding area. The recommendation for the amendment change is at the very high end of the medium density, by allowing this change to go through you lose that easy transition to existing commercial and other possible medium density to the north. ~~The transition you will see will be low density — very high medium if not low high density — back down t~~
- The height restriction of 12m was specifically put in because of the topography of the land!!!

The paragraph on height

Read paragraph

- In the current zoning we have the height limitation which has been set at 12m, this height restriction is here because it is being sensitive towards the possible development, the topography of the land and the surrounding neighbourhood. If you allow the rezoning to take place you will give this limitation away and never get it back. Drewlo wants this change and will be in violation of the policy that is in place for no reason at all as there is absolutely no reason why a 6 storey apartment building has to be here.
- The policy does state that in some instance the height can be changed if determined through a compatibility report that it is appropriate subject to a site specific zoning by-law amendment. Regarding some points from that compatibility report based on points on page 18.

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Section covering “Pursuant to section 3.3.3 of the Official Plan,

- Point 1 - The transition between the building and the current housing done by parking lot and landscaping. This is alright, the exact same thing can be done with a 4 storey apartment. In fact the landscaping can be richer, fuller and more abundant because you will not have to have so many parking spaces which would make a nicer transition.
- Point 3 and 4 – lighting and privacy fencing – this can be done with any development

- Point 2 – this is stating that the 6 storey apartments built in the proposed location would not have any more impact than a 4 storey building being about 5 m from the backyard of a house on Garibaldi.
 - This is making an assumption that a 4 storey unit would be build that close, why would this be done, if Drewlo is putting the 6 storey units away from the housing and separating the two with a parking lot and landscaping why would the same not be done for a 4 storey building, is this not part of the Official Plan? You need to do a proper comparison
 - Is the 75.5 m distance even accurate? The frontage of the subject lands on Blackwater is 80 m as per page 4 of the planning dept's report. That is the distance from the backyards of houses on Garibaldi to Sunningdale road. This means the building will only be 4.5 m deep, that is a narrow building. This distance of 75.5 m is not accurate, is not relevant.
 - According to Drewlos's Urban Design Brief on page 8 it states the separation between the single family lots and the apartment buildings is in excess of 35 m at the closest point to over 54 m for the buildings running east west. Now if you have a building 18m tall approx. 54 m from a house will it have an impact compared to a 4 storey put 5 m away from a house. I think it will. Building 1 is L-shaped with part coming south down Blackwater, the closest it will be is about 35m from the houses. Even with the 5th and 6th floors being tiered I think it will have an impact compared to a 4 storey 5m away from the existing houses.
 - What about the people who live at the northern edge of Blackwater and any future development at the southwest corner of Blackwater and Sunningdale? They look onto the subject lands as well. The 4 storey building has to go in the same spot as the 6 storey, 6 is greater than 4 so there will be an impact.
 - Also have to consider the topography. According to Drewlo's Urban Design brief on page 7 the parking lot is 2m above the residential houses, because of the topography of the land the apartment building will be starting its ground floor higher than the parking lot this means that the apartment building is already starting about 1 floor higher than the existing housing to the south of the subject lands. The model used in point 2 was it done as if the land was flat or did they actually consider the slope of the land as well because it does play a very important factor. This report doesn't say. **Use picture from Urban Brief on page 4 at bottom**

- Based on these points this development by Drewlo is not mindful of the subject lands topography and effects of the neighbouring lands. As a result the compatibility report does not give a substantial reason as to why the height limitation should be ignored and the height changed to allow a 18m building!

Pg 18 Upland community plan

- In the Uplands Community Plan report prepared by the City of London Department of Planning and Development Dec 1998 on page 19 section 4.7.2 it states
 - “The medium density residential portions of the new Uplands Community are focused primarily along Sunningdale Road East and Adelaide Street North These locations have been selected for the medium density residential development for several reasons. First of all, these locations are along the arterial road system surrounding the community plan area. This allows easy access to the main traffic carrying roads **without having to travel through lower density residential neighbourhoods**
 - Drewlo’s proposal for his building are violating this statement. Building 3 exits onto Garibaldi. People in that building have to go through the existing low density neighbourhood. In addition the only way in and out of our community is from Blackwater, residents in any of these 3 buildings will have to go through a low density area to get to the arterial roads, there is no other entrance/exit. According to the Transportation Assessment Plan submitted by Drewlo on page 4 paragraph 2 the volume of traffic is 2800 more vehicles per day on our low density roads because of the proposed apartments. It could be argued that the apartment residents will exit the buildings and go straight to the arterial roads and not come through our community. The Transportation Impact assessment submitted by Drewlo pages 18 – 23 shows that vehicles will be turning south onto Blackwater to head towards Adelaide Street. Their own assessment show vehicles coming through the low density housing to the arterial roads. Over the past several years I have watched my neighbours at the northern end of Blackwater do the same pattern, it is the logical choice to head south into the city. All of this means that potential 2800 more cars per day will travel through a low density community which is against the Uplands Community Plan as stated before.
 - Other points from the Upland community Plan

- There is **NO** mention of any Multi Family High Density Residential of 75 or more u/ha in this document.

Pg 19 – Transition with Existing development

- the rationale that the apartment buildings will be used as a noise barrier for the low density housing does not apply because in the uplands community plan 1998 on page 22-23 section 4.7.6 Mitigation of Arterial Road noise “Locating the medium density residential developments adjacent to the arterial roads provides a greater opportunity to incorporate design considerations which alleviate the need for noise barrier walls” means that having these lands as medium density anything that was built here would be a noise barrier.
- The Upland Community Plan was an endeavour of residents, city and developers of which Drewlo was one. All of the ideas and recommendations that were in that plan including designations of land use and densities were agreed to by all the parties. The Municipal Council, at its session of January 18, 1999 resolved that on the recommendations of the Commissioner of Planning and Development that the Uplands Community Plan document be adopted pursuant to Section 19.2.1 of the Official Plan as a guideline document for the review of development applications.. According to this submission there were **NO** objections or concerns to this Community plan by Drewlo Holdings Inc.. Ron Burnett, Development Engineering, on behalf of Drewlo Holdings Inc. expressed support for the Uplands Community Plan. Now several years later Drewlo wants to go back on his agreement with everything that was laid out in that Plan.

Replies to responses:

ii) Traffic

- The response from the city is confusing. It is stating that with a 2 access option to Garibaldi Ave will have a daily traffic volume of 1900 on Blackwater Road where the 1 access option would be 650 vehicles per day. This is incorrect. According to the Transportation Assessment Plan submitted by Drewlo on page 4 paragraph 2 the actual volume of traffic is 2800 vehicles per day.
- There is a huge concern regarding the massive increase in traffic and the children in our neighbourhood which our community is rich in. The local park with playground is on Blackwater Road and even though

there are traffic calming measures they will not reduce the volume of traffic that will be on this street with these apartments.

Additional comments:

- According to a “City of London Sunningdale Road Improvements Wonderland Road North to Adelaide Street North Environmental Study Report” prepared in May 2013 by Aecom there are a couple of references on page 5 under Public Consultation and page 63 section 4.3 Public and Agency Comments to “Existing traffic problems on Thistlewood Drive and Blackwater Road”. The report does not get into specifics but if this independent report already has stated that there are existing traffic problems on Blackwater Road 400+ cars will only compound the problem.

lii) Parking

- Although there are more spaces than a by-law has as a requirement for the apartment developments on page 1 iv) there is a recommendation that some of the parking be reconfigured to breakup the parking fields with landscaping. Based on the design plans I feel this will reduce some of the spaces. Less spaces means more possibility of overflow to the city streets of which Garibaldi will not be able to sustain many parked cars and with only one entrance to Blackwater the top of Blackwater could become congested as you approach Sunningdale.

iv) Privacy – this was covered when going over the compatibility points on page 18

Other concern

I also have a concern with the proposed development regarding drainage. Currently residents of Garibaldi do experience some problems with flooding in their basements due to the slope of the land. Should the development of 3 6 storey apartments go through there will be less natural land to absorb water run off which could cause further problems for the people on Garibaldi. It was recommended on page 1 of the report v) to introduce small ponds to assist with drainage but part of Drewlo’s plans have at the end of every parking laneway an area designated Snow removal area. This area backs onto the backyards of residents and could potentially cause more problems with drainage.

Summary

- Throughout my presentation I have stated that there is no clear cut reason why this zoning amendment needs to be allowed to proceed and there is no reason why Drewlo has to build 3 6 storey apartments. The current zoning is perfectly fine as is the possible developments that could be done on these subject lands, they would meet the current zoning by-law.
- I have shown that allowing buildings of 18m and a density of 75 u/ha is **not compatible** with the existing neighbourhood and does **not offer** any transition in the surrounding areas but is a jump. The lands to the north have not been defined as to what will be there. Immediately to the east is a very small commercial land. East of Adelaide is zoned for commercial but there is nothing there. North east is land designated as UR and it also has no set plans for the future.
- The Uplands community Plan was bought into by all participants in 1998. As residents have moved in they have all accepted what this area was zoned for and what possible development could be done. They made the decision to live here knowing that zoning. Now Drewlo wants to take all that away.
- What is in this overall
 - City
 - No big corporation coming to town
 - No new jobs
 - No big boost to economy
 - Community
 - There is nothing this brings to our community but congestion and a much heavier traffic load. There is no commercial in these apartments to improve our lifestyle, there is no pool or other resources. Space and park like atmosphere but we already have a park and walkways.
 - And lastly you have had greater than 85% of the community say that they do not want this.