

From:

Sent: Friday, October 6, 2023 11:43 AM

To: Council Agenda <councilagenda@london.ca>

Subject: [EXTERNAL] Objection to York Developments' Request for Official London Plan Amendment and Zoning Bylaw Amendment

Note: I give permission for my letter to be placed on the Council Meeting Agenda.

October 6, 2023

London City Council

City of London

Dear Members of Council,

Re: Objection to York Developments' Request for *Official London Plan Amendment* and *Zoning Bylaw Amendment*

I understand that York Developments is requesting an *Official London Plan Amendment* and a *Zoning Bylaw Amendment* to add two high-rise towers on the historic Middlesex County Court House property. One proposed tower will be 53-storeys high, the other 43. The current maximum building height is 20 storeys.

It is quite shocking to me that such an amendment is even being considered. A building of this height might be reasonable in a city like Toronto, New York, or Chicago, but is completely inappropriate for London.

Aside from having a negative impact on the river front and the historic Courthouse, the area around King Street and Thames Street has already experienced significant problems with flooding, storm water runoff, sewers overflowing and traffic volume, which will only become exacerbated with such a large-scale structure. Furthermore, I would assume a construction project of this scope will take several years to execute properly and safely, and there will be problems and delays experienced along the way. This will mean several more years of disruption, inconvenience, and frustration to Londoners travelling, working, and visiting in the downtown core. And further to that, given the serious skilled labour shortages Canada is currently experiencing, it's unrealistic to assume the proponent will finish the project within the proposed timeline. Again, it's Londoners who will bear the negative consequences.

No doubt proponents of the project argue these high rises will be a "sustainable" and "green" option for London because they allow for so much density and avoid urban sprawl and the destruction of farmland, and that somehow this will be good for fighting climate change. First, London will (unfortunately) continue with urban sprawl regardless of whether this project goes ahead. Second, the environmental sustainability of super high buildings has been challenged by experts in the field, such as Patrick Condon of the University of British Columbia who notes, among other things, that high rises use almost twice as much energy per square metre as mid-rise structures and because they are build largely of steel and concrete, they product a lot of greenhouse gas (GHG) emissions, compared to wood which traps it. As he puts it: "Concrete is 10 times more GHG-intensive than wood." (see: <https://ourworld.unu.edu/en/a-city-that-runs-on-itself>) Given London has declared a "climate emergency", I don't see the sense of building a couple of structures that are going to increase rather than reduce GHG emissions.

Extremely tall buildings are also more structurally demanding than lower ones. For example, it takes more effort to stop them from swaying, and they are much harder and more expensive to fix when something goes wrong. Then there are soil conditions to consider. In Manhattan, for example, tall buildings are constructed mostly on rock. In London, U.K., which is mostly clay, tall buildings require ample foundations. <https://www.theguardian.com/artanddesign/2020/jul/11/skyscrapers-wasteful-damaging-outmoded-time-to-stop-tall-buildings> London, Ontario is mostly clay and sand so I have no idea how the proponent can expect to build a foundation deep enough in that location that could safely support a 53-storey structure. Of course, the proponent will no doubt counter that this will all come out in the environmental assessment. This leads me to another critical point which is who will be performing the environmental assessment? Will it be a neutral third-party engineering firm or will it be a firm of the proponent's own choosing?

The downtown core already has an abundance of vacant space that could be used for residential and commercial purposes. We will have even more space available as more small business owners close shop because of the rising crime, drug use, and overall unpleasantness in the area. It makes no sense to increase our inventory of vacant space when we are not using what we have to its full capacity.

Apart from all these technical issues I just raised, high-rise buildings of this scale also undermine the character, livability, workability, and social fabric of cities. It will leave the downtown area devoid of charm and authenticity.

Finally, high-rises of this scope can be a barrier to equity. Tall buildings offer increased profits for developers; however, the higher the building, the more expensive the construction. Developers no doubt are looking for a return on investment (ROI) and therefore are not going to be renting these units to people of modest financial means. If we're looking to solve the housing crisis, we need to offer affordable rental options for people, which these units will certainly not be.

In conclusion, the fact that York Developments spent a lot of money to acquire the land, knowing full well how it was zoned, is not our problem as Londoners. If developers wish to build, let them come up with projects that fit with existing by-laws, not expect the City to adjust the bylaws (many of which are in place for good reason) to suit their economic objectives. This proposal must be flat out rejected.

Sincerely,

Anne Papeh