

**From:** Jared Zaifman

**Sent:** Thursday, September 5, 2024 5:09 PM

**To:** PEC <[pec@london.ca](mailto:pec@london.ca)>

**Subject:** [EXTERNAL] RE: Communication - PEC Agenda Items 3.6 and 3.7

Members of the Planning and Environment Committee,

I am getting in touch today to share LHBA's position on the heights framework and PMTSA's, items 3.6 and 3.7 on the agenda.

These two items have come about as a result of London's successful application to the Housing Accelerator Fund which at its core is about "Removing barriers to encourage local initiatives to build more homes, faster."

From the London HAF Action Plan summary, this item aligns well to achieve initiatives 1 and 3: Proactive As-of-Right Zoning to Promote High-Density Development, and Promoting Infill Development.

While early on in this process we felt there was a lot of positive aspects to come out of this work by staff which looks to help achieve these initiatives and reduce overall development and building timelines, we have seen the latter end of the process take two steps back with concern of more barriers being introduced into the process rather than removed.

We fully support the recommendations and feedback shared by LDI as we worked collaboratively amongst our members on this effort to try and put forward one position which industry can broadly support and work with.

Rather than repeat all the points in what they have shared, I wanted to highlight a few key areas:

**Stacked Townhomes:**

- Stacked townhouses should be added to the Neighbourhood Streets classification as permitted use and in support of that to have a base condition of 4 stories along a Neighbourhood Connector

- Providing 4 stories in neighbourhood connectors would give the flexibility needed to make a stacked townhouse project broadly viable

### **Reasons for support of change:**

- Immediately opens up a great deal of opportunity for dense and attainable forms of housing. With rising costs of all inputs into building, stacked townhomes are becoming a popular type of home to build which is often now becoming the new starter home
- This is also a type of home that many builders in our community have done and are beginning to do enabling many of our members to begin building much sooner
- Reiterating one point from the LDI submission, Stacked townhouses are currently allowed under R6 and some R5 zones so why are we reducing current permissions? Is this not the opposite of encouraging more housing units.

### **TSA Zones**

- Permitted uses should allow for stand-alone residential in all TSA's and not exclude TSA2, 4, and 7

### **Reasons for support of changes:**

- London's downtown is currently experiencing its highest ever downtown office vacancy rate of 30%
- National vacancy rates are at an average of 19% which is up from an average of 8% dating back to 2014.
- Trends seem to indicate that number will remain high, and while staff have suggested advice from the economic development team indicating we will still need more ICI space downtown in the future, builders will not build more commercial space while such a glut remains vacant.
- Forcing the building of commercial space will also limit the potential number of residential units that can ultimately be built which is opposite to the intent of the HAF funds
- If at a future point new commercial or office is in demand, we would see conversions/renovations

### **Draft Request to Civic Administration (Site Plan)**

- Staff have added a “Draft Request to Civic Administration”. The request is for staff at the site plan stage to consider several new targets that were previously raised as possible regulations to go along with the recommendations to council.
- We are requesting this “Request” be removed

### **Reasons for support of changes:**

- We believe the HAF funds are intended to simplify processes, remove barriers, help with affordability, and ultimately get more homes built faster.
- Unfortunately what staff is recommending to become part of the site plan process is counter to all of those goals
- Because these are targets set out to site plan, and site plan is a subjective process which can vary staff to staff, it will likely slow the overall timeline of projects and make them and ultimately housing, more expensive.

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We thank you for the opportunity to provide feedback and hope it can be taken into consideration as part of your discussion on the matter.

Thank you,

Jared

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