September 6, 2024

Mr. Stuart Filson & Sarah Baldwin sfilson@london.ca & sbaldwin@london.ca Planning & Development City of London

Dear Mr. Filson and Ms Sarah Baldwin,

Re: The Proposed Oxford/Richmond Transit Village (File: O-9752 (Heights) and File OZ 9726 (Transit Village)

The latest Revised Notice of Planning Application & Public Meeting regarding Official Plan/Zoning By-Law Amendments states the following:

The purpose and effect of the Official Plan Review is to ensure The London Plan policies conform to Provincial Plans and Policies, and conform with municipal growth management responsibilities

Unfortunately, these latest proposals fall short of such conformity.

I do not have a problem with intensification in the Oxford/Richmond area with the proposed broad range of uses (e.g. residential, retail, service, office, cultural, etc.). This intensification, however, must: (i) be in conformity with the Planning Act, the Provincial Planning Statement 2024 and provisions of The London Plan (Official Plan); and (ii) take into consideration how the intensification affects existing buildings within the proposed Transit Village and affects the surrounding areas. Permitting 30-storey buildings in the Oxford-Richmond area as of right is not appropriate. For example, there is a row of heritage houses on the south side of Piccadilly Street west of Wellington Street within the latest proposed boundary of the Transit Village. If the proposed amendments to The London Plan and the Zoning By-Law are approved, these houses will likely be demolished and replaced by a 30-storey building. Given that additional housing is required on an expedited basis, isn't it counter-productive to demolish existing houses? How does this conform to provincial and federal initiatives to build more housing (especially affordable housing) faster?

Using the federal Housing Accelerator Fund, the City retained SvN Architects + Planners to review the existing heights framework in The London Plan. This review involved consultation with developers and with City staff – but no other parties. Building 30-storey towers may fulfill the requirement for intensification but does not adequately take into consideration the effect on existing buildings (especially residential buildings) within the proposed Transit Village nor the surrounding areas (particularly to the east and north). The adjacent location of the Bishop Hellmuth Heritage Conservation District and the potential St. George-Grovenor Heritage Conservation District (which was extensively studied as set out in a 2016 report) should not be ignored.

I point out the following provisions in the Planning Act, the Provincial Planning Statement 2024, and