

**2016-04-25**

**Opposition to file number OZ-8579**

With the proliferation of drive-through facilities in London and impacts on air quality, GHG emissions, litter, noise, built form and pedestrian safety; this re-zoning proposal is particularly concerning and has broader city-wide implications.

Perhaps the most troubling part of this proposal is the demolishing of two homes on both Highbury and Short Avenue to develop a Tim Hortons. In a city where poverty, homelessness, precarious housing and employment are rampant, the tearing down of affordable homes to build a commercial drive-through restaurant is appalling. The Mayors Advisory Panel on Poverty may have a lot to say about a plan that eliminates affordable housing in favour of adding to the existing 59 Tim Hortons restaurants that currently permeate our cityscape.

I am in direct opposition to this re-zoning proposal and request that the City of London invest in a Drive-Through Study and public consultation process and defer re-zoning applications and zoning by-law standards related to drive through facilities pending further study. Many other communities have undergone such studies used to inform their municipal policies and directives to be in concert with their official plans. Such communities include: Ajax, Markham, Hamilton, Ottawa, Toronto and Oakville. Of particular mention is Ottawa. The city planning division sought public input regarding zoning by-laws within residential neighbourhoods. Of the 359 area residents who completed the small sample online questionnaire, when asked the question: "Would you have any concerns if a drive-through facility were located close to your home?", 89% expressed a range of concerns. Some of these expressed concerns include:

- Drive-throughs do not foster community coherence and connection
- Does not support walkability
- Congestion of traffic and noise
- Does not support neighbourhoods as safe gathering places, and are impersonal
- Drive-throughs do not promote the local culture and needs of the community that they are located in, but rather cater to outsiders who have no investment in the health, wellness and livability of that neighbourhood
- Drive-throughs are contrary to all principles of a pedestrian neighbourhood and livable city

As far as I can tell, London's by-laws include some of the lower set-back distances of 30 metres to residential lot lines- most municipalities regard 30 metres to be the bare minimum. Set-back and parking spaces are also lower than many municipalities and are the same for residential neighbourhoods as well as institutional and facility use neighbourhoods. Now is the time to

invest in such a study, complete with guidelines that will assist in regulating the layout, built form and appearance of drive-through facilities as well as assist in mitigating any adverse impacts. The overall intent of the guidelines will be to promote:

- Compatible development that fits in well with the surrounding area and minimizes impacts on adjacent uses
- Functional and safe traffic movement
- Safe stacking lane and site access placement
- Safe and accessible pedestrian connections to the building from both the public and private realms
- A high quality and pedestrian supportive urban streetscape

In regards to zoning by-laws, the existing policy context points to The Provincial Policy Statement: a set of objectives and policies which provide a high level land use planning framework. Policies within the Building Strong Communities section encourage efficient land use patterns which promote livability, healthy communities and the protection of public health and safety.

In the Fall of 2009, Ontario Professional Planners Institute in partnership with the Ministry of Municipal Affairs and Housing (MMAH) published a healthy communities handbook which outlines the links between health and the built environment. As the link between health and the built environment is reconnected, consideration must be provided for the arrangement and design of the built environment and how this affects people's health and the way they physically and psychologically relate to and interact with their community and the wider world around them. Growing research points to a number of land-use components that influence human activity, facilitate health and mental well being and promote social interaction and inclusion, including:

- Layout, design, connectivity and maintenance of sidewalks, roads and non-motorized transportation, paths and trails
- Land uses that might include some combination of homes, stores, businesses, institutions, community and cultural facilities and industries
- Compactness, density and accessibility of built areas
- Connected networks of motorized and non-motorized transport systems
- Safe, comfortable and attractive streets, public spaces, buildings and structures
- Healthy and resilient natural environments and biodiversity

A Drive-through Facilities study and subsequent Design Guidelines should be viewed as part of a much wider set of policy based initiatives that the City of London is pursuing in an effort to attain a higher level of livability, sustainability and community health.

London Strengthening Neighbourhoods Strategy places the environment first and sustainability at the core of every aspect of London's land use policies, practices and service delivery within neighbourhoods. London's goals to create a healthy environment, a high quality of life for all,

economic prosperity and social and cultural vibrancy are being advanced through strategies aimed at delivering a new form of neighbourhood growth that is more dense, transit-supportive and respects the natural and built heritage. The links between the health and longevity of new and existing communities with land use planning and transportation are of key importance as the City moves towards its goals.