

London Planning & Environment Committee
Monday April 10th, 2017 - 4:00 p.m.

To the London Planning & Environment Committee Members:

Counsellor T. Park (Chair)
Counsellor M. Cassidy
Counsellor J. Helmer
Counsellor A. Hopkins
Counsellor S. Turner

Planning Department's Proposed New Policy Language:

DELETE the following policy form policy 20.5.3.9(iii)(g), "for all office and apartment building development, parking shall be located underground in a structure integrated into the building" and *replace it with policy to be consistent with the London Plan* (page 2 of John M. Fleming, Managing Director, Planning Department briefing document for Committee members).

NEW POLICY LANGUAGE PROPOSED:

"Parking should be located underground for large buildings, such as high-rise residential buildings, office buildings, and mixed-use buildings." (page 5 of John M. Fleming, Managing Director, Planning Department briefing document for Committee members).

Objection to the New Policy Language Proposed:

The new language is ambiguous and subject to interpretation. The term 'high-rise' is not defined. What constitutes a 'high-rise'? Is it three stories, five stories, seven stories, ten stories, or twelve stories? A Developer may classify a 'high-rise' as a building over ten stories, but a local home owner who lives in the shadow of a high-rise may classify a 'high-rise' as any building over three stories.

The consequences of not clearly defining the term 'high-rise' is that it will be subject to interpretation. There is a real danger that the subjective term 'high-rise' will change over time and the initial intent and objective of the Planning Department and Planning Committee will be lost. In addition, when a term such as 'high-rise' is not defined, the number of appeals associated with the term will escalate on all sides of a debate from Developers, Planning Department, and members of the

general public. This Committee and the Planning Department will then be 'bogged down' with unnecessary meetings discussing the term.

Recommendation:

Therefore, it is recommended that the Planning and Environment Committee reject the proposed new policy language as it is and request the Planning Department clearly define the term 'high-rise'.

From a residential home owner perspective, any building greater than three stories should be defined as a high-rise and should require mandatory underground parking to achieve a compact form, pedestrian-friendly streetscapes, reduce environmental impact, and encourage higher levels of green space for all residents.

Thank you for the opportunity to address this committee today.

Stephen Gallant