

October 20, 2017

Councillor T. Park (Chair)	tpark@london.ca
Councillor M. Cassidy	mcassidy@london.ca
Councillor J. Helmer	jhelmer@london.ca
Councillor A. Hopkins	ahopkins@london.ca
Councillor S. Turner	sturner@london.ca

Dear Members of the Planning and Environment Committee,

Please accept these comments regarding the development proposal for 661 – 667 Talbot Street.

- Members of the North Talbot Neighbourhood who submitted comments to the planning staff did not receive notices of this public meeting. I did not receive a notice. I am the Chair of the North Talbot Neighbourhood Association. I did not receive a notice even though I have been active in the process from the beginning. As I write this, I can also confirm Heather Chapman of 152 Albert Street did not receive a public notice and I will confirm with others whether public notices were received. I did raise the lack of public notification with our Councillor Tanya Park, but as of yet received no reply. I do not anticipated that you will be hearing from many residents because they were not notified and also because all the concerns raised regarding this development have been ignored by planning staff.
- There is very little support from residents for this development proposal for the following reasons:
- The development is too large. Variances are designed to protect people from oversized ambitious developments that could negatively impact the surrounding neighbourhood. In other words, variances are rules to protect people from bad planning. This development ignores too many variances, resulting in a bloated building so large that no canopy trees can be established on site. With this development dozens of large mature trees will be removed with no space to replace them. The variances on the setbacks are extreme. I have attached what the variances actually are in real terms.
- This development requires a bonus zone that almost doubles the height and density of what is currently permitted. It is unclear why this development is awarded such an extreme bonus zone. The development will house ONLY three bedroom units. The target market is students. Three bedroom units ignore the demand for more affordable housing especially for elderly and single renters. It is broadly acknowledged that elderly and single renters have a harder time finding affordable housing. This development offers no social or affordable housing in exchange for bonus zones. The North Talbot neighbourhood already has an excess of student housing, therefore adding more student housing will not benefit this neighbourhood. North Talbot is currently a mixed neighbourhood. This development will tip the balance making it more campus-like and

less diverse and stable. There are negative consequences to tipping the balance towards non-permanent or short-term residents. The tangible impacts of a student dominated neighbourhood is that it is empty for many months of the year, making the neighbourhood vulnerable and susceptible to crime because there is no one to watch over it. Two years ago, three men of no fixed address lived on the porch at 129 John Street from May to August because the house was empty. Another individual lived in the garden shed at 167 John Street this summer because that house was also empty. The house at 137 John Street too was empty for half of the year except when parties were held in the backyard but not by the renters. While this development is a highrise and not a single house, the activities I describe are all symptomatic of a neighbourhood that lacks eyes and ears to protect it. This development will make it worse not better. This development will add a highrise that is empty for half a year or it will be rented out as temporary housing as is common practice with on campus residency at Western University. That is the tangible and predictable outcome of this development. While any renter can be transient, students are predictably transient.

- It is also common practice for landlords to rent these units per room under one lease. Not all residents within one unit or lease are 'family' or even known to each other. Students rent what is affordable and will enter into these lease agreements to obtain affordable housing regardless if other occupants are known to them. Renting per room allows landlords to raise the cost of the unit rather than offering one price for one unit. It is cheaper for a single student to rent a 'room' than a one bedroom apartment. This effectively creates illegal rooming houses and is exploitive of low income students. It also reduces fair market rental units for single people who cannot live in shared accommodations and on fixed incomes such as seniors or minimum wage earners.
- We have raised these concerns over and over again with staff only to receive blank stares back. It is a chronic problem in Near Campus Neighbourhoods that is exploitive yet council does nothing about it. It is council's responsibility to ensure housing meets the needs of the community and this one does not. It does not help students, does not provide affordable housing or encourage a more diverse and stable demographic. This type of housing is abundant and not needed.

So why then does it deserve a bonus zone that will double the permissible density so much so that not one canopy tree can be grown on the site?

The planning department has ignored every concern raised by residents and has thrown out every precaution embedded in good planning principles to ensure this development precedes. Why? Simply because they can? They can justify anything under the Planning Act, but it is good planning?

The targeted market for this development must be considered because it will have a real tangible impact for potential renters, long-term residents and who is being excluded. We are not talking about bricks and mortar. We are talking about REAL PEOPLE, REAL

COMMUNITIES and much needed affordable housing in the downtown core to ensure the downtown remains diverse.

- This development requires an Environmental Impact Study (EIS). Planning staff decided it wasn't necessary because they acquired the slope behind the development zone. The staff believes the slope will be protected if it belongs to the city. That is irrelevant to the purposes of an EIS.

The slope is designated as a hazardous slope. It is undevelopable regardless of its ownership. Therefore, it is protected from development by default and the issue of development is mute. An EIS is needed to access the impacts of the development on the natural environment such as hard shadowing on the vegetation, disruption of rainfall blocked by the height of the building and impacts to shoreline species. All these concerns have been raised with staff, all of them dismissed. This development sits along a natural heritage corridor and requires a study to understand the negative impacts of this development.

The One River Environmental Assessment Agency Advisory Committee Report states in section 3.3.2:

“..... at least 17 SAR (Species at Risk) have been observed or mapped near the One River study area, upstream of the Springbank Dam. While some species may use the study area on a transient basis for migration or foraging, some species are considered “resident species” and use the habitat to fulfil their life-cycle needs to maintain a viable population. If a SAR is considered a resident, then the area is considered critical habitat.

SAR habitat is protected by both federal and provincial legislation by the Species at Risk Act and Endangered Species Act respectively. “

The One River Study Area reaches to Blackfriars Bridge. This development is within a few metres of Blackfriars Bridge. Planning staff are indicating that this development will have no impact on SAR because they have now obtained ownership of a hazardous slope. Similar concerns were also raised by the authors of the Land Status Report reporting that the city lacked data to make any decisions of SAR.

The Land Status Report also made comments describing that the aquifer on this site and all along Talbot Street is very close to the surface – only 9 metres deep and likely the reason why adjacent older highrises have primarily above ground parking lots.

There is no shadow report to determine shadowing on neighbouring lowrise houses or the natural heritage slope.

All these issues would be reviewed through an EIS.

- Without any public discussion, planning staff decided to dismiss the requirement for public open space and instead accepted a cash in lieu. This neighbourhood absolutely

wants more open space and does not appreciate planning making a prior decision to forego this requirement. Downtown neighbourhoods are rapidly losing tree canopy and green space. They are being replaced by parking lots that leave no room for canopy trees. The accumulative consequences of these decisions site by site result in denuding downtown residential neighbourhoods of green space and canopy trees or 'shade' trees while at the same time increasing density. I have attached a petition with signatures taken within a two block radius of the development site supporting MORE green space not less.

Finally, I need to express the acute frustration, shared by many, of the lack of public consultation of development proposals that will profoundly shape their neighbourhoods. The frustration is not mine alone. Staff at the OMB recognize that the City of London has a disproportionate number of Appeals compared to other municipalities and I assume this is a direct result of the lack of public consultation and recognition of their very reasonable and understandable concerns.

This development needs to comply to the existing zoning parameters because it offers nothing unique to this community. And the city needs to live up to its environmental responsibilities by conducting an EIS.

Thank You

AnnaMaria Valastro
133 John Street, Unit 1
London, Ontario N6A 1N7

Attached:

A sample of previous comments from residents to planning staff. (hard copies)

Photographs of the slope along the Thames River behind highrise developemnts that show the lack of vegetation due to hard shadowing and lack of moisture obstructed by the highrise.

First two photographs were taken behind the Mary Campbell Co-op.

Second two photographs were taken behind 359 Riddout – The Blackfriars Apartments

The last three photographs show the slope behind 661-667 Talbot. The slope is not barren as the sloped areas behind existing highrises. The understory trees are buckthorn but in this case do not seed, so while present, are not aggressive.

Petition requesting greater green space at 661-667 Talbot Street. (hard copy).

The One River Environmental Assessment Agency Advisory Committee Report sent separately.