



North Talbot Neighbourhood Assoc.

October 25, 2017

Members of London City Council

Dear Council,

Please accept our comments regarding the development proposal at 661-667 Talbot Street by Drewlo Holdings.

The residents of North Talbot are asking you to please support the position of our Councillor Tanya Park in rejecting this proposal. Our understanding is that Councillor Park rejects this proposal because it is an over-intensification of the site that will loom over and dominate the surrounding low rise heritage neighbourhood of Talbot Street and the North Talbot Community.

Council as recent as July approved fast tracking North Talbot as a potential heritage conservation district and we hope you measure his development against the overall heritage quality of Talbot Street as a whole and not just the immediate vicinity.

Keeping this in mind, we believe this development is contrary to the goals of the Near Campus Neighbourhood Strategy which states:

“Intensification has been a primary concern within the near campus neighbourhoods since the first strategy was adopted in 2008. Many of the planning policies adopted in the 2012 Official Plan and Zoning By-law Amendments were intended to ensure that the amount and location of intensification is appropriate, and that the intensity of uses does not overwhelm existing neighbourhoods infrastructure and amenities. “ page 3 Staff Report - December 14, 2015

This development requires a Zoning By-law Amendment which seeks relief from the established minimum setbacks of the zone – an indication of over intensification. We support Councillor Park’s position and ask council to permit a new development that remains within the current zoning of high density residential without a bonus zone.

It is our hope that by upholding the current zoning, the developer will build a more modest and humble development that offers a greater variety of housing options at a greater diversity of costs accessible to a wide range of renters.

It also our desire to support a development with greater amenities including open green space that better reflects Talbot Street’s history of stately homes and a ‘leafy’ tree-lined street.

Near Campus Neighbourhood Strategy.

Mayor Matt Brown stated that is development reflects the goals of the Near Campus Neighbourhood Strategy. We couldn’t disagree more and encourage you to please

review the Near Campus Neighbourhood Strategy Staff Report, especially section **Balance of Long Term vs Short Term Residents** – page 2. Staff Report - December 14, 2015

Specifically it states:

The 2008 strategy and subsequent amendment to the Official Plan recognized that it is important for the overall success of neighbourhoods that there is a balance of long and short term residents. It was observed that in some parts of the near campus neighbourhoods the balance has tipped too far towards a majority of short term residents, resulting in a lack of stability in the neighbourhood.

Table 2 on page 4 shows that our neighbourhood, the North Talbot Community, has had the greatest intensification of all near campus neighbourhoods at greater than 200 units between 2012 and 2014.

We believe our neighbourhood has surpassed that tipping point with the influx of investment property developers who have converted many of the large homes and highrises into short-term rentals aimed exclusively at the Toronto student market. This has pushed rental prices to reflect the Toronto housing market and above the average rental cost of similar units found throughout the city.

Glenn Matthews, Housing Mediation Officer for Western University has kindly provided me with a link to off-campus housing listings <http://offcampus.uwo.ca/listings/>. We are encouraging you to please review and compare these prices – priced per bedroom – to other typical rentals throughout the city – found on Kijiji London.

Housing determines who lives where and when - and the vast majority of housing stock in our neighbourhood is exclusively reserved for the Toronto student market with units averaging 5 to 3 bedrooms.

The net result of these housing conversions and developments is that our neighbourhood is becoming less diverse, more exclusive and people are being pushed out because the cost of units are unaffordable.

Units are also designed for short-term renters. The bedrooms are dorm-like with little or no storage with an emphasis on common areas. They are inhospitable to renters such as families who may require more private space and storage.

To date, we would say that the Near Campus Neighbourhood Strategy is failing us.

Our neighbourhood is so dominated by high end short-term rentals, we cannot, for example, establish a Neighbourhood Watch because there is not enough density of long-term residents to support a Neighbourhood Watch.

This is not a year to year problem but a month to month problem as many students are only present for a few months of the year, leaving for their home base once school is finished and returning once school resumes.

This makes the neighbourhood unsafe and unstable making long-term residents isolated and vulnerable.

We are asking that council embrace the goals of the Near Campus Neighbourhood Strategy in real practical terms. The North Talbot Community supported the strategy initially because we support a diverse neighbourhood. We understand diversity is key to healthy stable communities.

This development proposal doesn't bring us closer to a balanced neighbourhood.

It offers housing stock that is already over supplied and no options for lower income individuals.

The London Plan

The London Plan is still in its infancy yet council is already considering deviating from it by supporting a Zoning Amendment that will create a bloated block building in the middle of a historical street that is larger and denser than the surrounding neighbourhood. This site is already zoned high density residential and the current zoning will achieve the goals of the London Plan as it is, without over intensification.

The Near Campus Neighbourhood Strategy already recognizes in policy the potential conflict between short term and long term residents by prohibiting balconies on new developments. It is our understanding that the absence of balconies is to control noise. Therefore 'block' buildings is all that can be offered. Whether these buildings are 'U-shaped', 'C-shaped' or stepped, they will always remain 'block' buildings.

There is an overwhelming consensus among residents that this development is extremely unattractive. Planning staff have confirmed that the final design was not peer reviewed by the [Urban Design Peer Review Committee](#), and it was made clear by the presentation at Planning and Environment Committee by the city planner that a bonus zone was offered to the developer as a 'given' and long before the final design was approved.

Therefore, we are comfortable in relinquishing control over design to the developer as would be the case if the zoning remained intact and no bonus zone offered. We see this as the best case scenario is securing a more modest building with greater open space. We support more green space than a reconfigure 'block' building.

Environmental Impact Study is required.

According to City of London GUIDELINES For the Preparation and Review of Environmental Impact Studies (EIS) November 2003 - Council Approved January 19, 2004, an Environmental Impact Study is required prior to approval of this proposed development because it is adjacent to a Natural Heritage Feature – the Thames River – which is classified as a Significant Corridor in Schedule B1- Natural Heritage Features - of the Official Plan.

The Guideline states explicitly:

BACKGROUND AND FRAMEWORK

“Section 3 of the Planning Act of Ontario requires that in exercising any authority that affects planning matters, planning authorities “shall have regard to“, among other matters, the protection of ecological systems, including natural areas, features and function.

Section 2.3 of the Provincial Policy Statement (1997) states, that where development and site alteration may be permitted, within or ***adjacent to significant areas***, proponents must demonstrate that there will be “no negative impact” (loss) on the natural features or the ecological functions for which the significant area is identified. Municipalities through their official plan set out how to satisfy the requirements of “no negative impact”. The process involves the preparation of a report typically called an Environmental Impact Study (EIS), or Development Assessment Report (DAR). “

The transfer of hazardous property - the ravine slope to the Thames River - from Drewlo Holdings to the city does not relinquish the city's responsibility to environmental protection nor cancel the need for an EIS. We are fierce in protecting what little green space remains in our neighbourhood as so much has already been lost. There is nothing that replaces an EIS as part of the approval process for any development that encroaches on natural heritage features.

We are asking that you please recognize council's responsibility to environmental protection.

Sincerely,

Eugene Di Trolio and AnnaMaria Valastro

on behalf of the residents of the North Talbot Community

CC: Council Tanya Park, Mayor Matt Brown and Residents of the North Talbot Community