



ZELINKA PRIAMO LTD

A Professional Planning Practice

Sent via email

September 21, 2018

Mr. Michael Tomazincic, MCIP, RPP
Manager, Current Planning
Planning Services
City of London
206 Dundas Street
London, ON
N6A 1G7

Dear Mr. Tomazincic,

RE: Zoning By-Law Amendment Application (File Z-8905)
JAM Properties Inc.
147-149 Wellington Street and 253-257 Grey Street
Our File: WDR/LON/16-01

Further to the comments received at the PEC meeting of September 10, 2018, and our subsequent discussions regarding the above, we are pleased to provide you with the following information regarding the bonusing provisions for the proposed development, on behalf of JAM Properties Inc.

Firstly, we acknowledge PEC's request to incorporate affordable housing as part of the proposed development. As you are aware, there were no discussions with respect to the provision of affordable housing, or requests for the provisions of such, between our client and City Staff prior to the PEC meeting. Although we appreciate PEC's request and acknowledge that there is a desire and need to provide affordable housing units within the City, we respectfully believe that it is premature to mandate this type of housing within a privately-owned development at this time.

To our knowledge, the City does not currently have a policy mechanism in place that outlines the requirements for the provisions of affordable housing within private developments. As you can appreciate, there are several factors including, but not limited to, number/size of units, term, rent, financial incentives, administration, etc. that are important and necessary to be evaluated at the onset of a project of this magnitude to determine its economic viability. As noted above, our client was never made aware at any point during the process that affordable housing would be required as part of the development, nor was it evaluated as part of the overall viability of the project. Through previous discussions with Staff, it was our understanding that bonusing provisions for the proposed development would be focused on the implementation of BRT initiatives.

As such, our client is hesitant and opposed to accepting the provision of affordable housing as part of the bonusing provisions for this project. Our clients have spent considerable time on this project with significant investment and financial obligations that do not take into consideration the prospect of an affordable housing unit component. It would be difficult, if not impossible, to go back and modify the economics of this project to include the cost implications of such a change at this late stage in the process.

We note, however, that the proposed increase in height and density will result in significant additional revenues to the City in the form of development charges and on-going tax revenues. This additional revenue could be used to facilitate affordable housing initiatives while a more comprehensive and publicly vetted process can be designed and adopted by Council. Should such a mechanism be developed, it could then be introduced at the beginning of the development approval process (i.e. at the pre-consultation stage) so that the developer working with City Staff can pursue an appropriate pro-forma for the project prior to making significant capital commitments. In the interim, the extent of bonusing qualified amenities being proposed (detailed below) for this project are consistent with, if not greater than, that which have been approved in many similar developments.

As such, we request that the following items be considered as appropriate bonusing provisions to permit an 18-storey apartment building, with a density of 557 units per hectare, consistent with Section 19.4.4 of the current, in-effect, Official Plan:

1. Provision of a building with an exceptional design standard (Section 19.4.4.ii)
As you are aware and, as was presented by zedd Architects at the PEC meeting, the proposed building design has undergone several iterations to address comments received from Staff, UDPRP and the public; and also addresses the urban design principles as per Section 11 of the Official Plan. The result is a high-quality design that incorporates various components, materials, and colours to achieve an aesthetically pleasing and vibrant design that will significantly improve and enhance the Wellington Street and Grey Street streetscapes, which currently consists primarily of a parking lot on the subject lands.
2. Provision for underground parking (Section 19.4.4.ii(c))
A total of 200 parking spaces are proposed for the development. A significant amount (80% or 162 spaces) of the parking will be located within an underground parking structure, to be accessed internally within the site, via Grey Street. The balance of the parking (required for accessible, visitor, and commercial use) will be located at-grade but situated behind the building, so that it is not directly exposed to the public.
3. Provision of enhanced landscaping along the Wellington Street frontage, within the public road allowance (Section 19.4.4.ii(d))
The proposed development will include the provision for enhanced public space elements along the Wellington Street frontage portion of the subject lands, with an emphasis to be placed on the southwest corner of Wellington Street and Grey Street. Conceptual drawings have been previously provided showing a potential mixture of hard surface (paving stone, benches, planters) and vegetation. The final design can be determined at the Site Plan Approval stage, to the satisfaction of the City.
4. Financial contribution towards the future BRT Station to be located to the south of the subject lands (Section 19.4.4.ii(h))

It is our understanding that the City's current accepted practice with respect to financial contributions that are put towards various public initiatives is an amount equal to 1% of the construction of the project, not to exceed a total amount of \$250,000.00. JAM Properties Inc. agrees to contribute \$250,000.00 towards the construction of the future BRT transit station, to be located to the south of the subject lands.

We believe that a financial contribution towards the BRT initiatives is appropriate in this instance as the subject lands are located along the future BRT route; the proposed development is a response to the City's desire for growth along the Wellington Street corridor; and the proposed development will promote the use of transit. As such, it is our opinion that any public benefit to be derived through bonusing, in addition to the above, should be for the purpose of advancing the BRT initiatives.

The proposed financial contribution towards the BRT station would also satisfy Type 2 Bonusing under the London Plan (contribution to the development of transit amenities, features and facilities).

We trust the proposed bonusing components discussed above are fair and reasonable in exchange for the required height and density for the proposed development, as per Section 19.4.4 of the Official Plan, and are consistent with bonusing provisions approved for other similar developments within the City. We believe the resulting development will effectively address the City's stated goals for developments such as this; will be regarded as a strong contributor to the neighbourhood character; and will be an enviable example for appropriate transit-based residential intensification.

Should you have any questions or require additional information, please feel free to contact our office.

Yours very truly,

ZELINKA PRIAMO LTD.



Harry Froussios, BA, MCIP, RPP
Senior Associate

cc. JAM Properties Inc. (via email)