

**2ND REPORT OF THE
LONDON ADVISORY COMMITTEE ON HERITAGE**

Meeting held on September 12, 2012, commencing at 5:30 p.m.

PRESENT: G. Goodlet (Chair), D. Brock, J. Cushing, D. Dann, D. Dudek, W. Kinghorn, J. Lutman, J. Nelson, S. Potter and D. Vandenberg and H. Lysynski (Secretary).

ALSO PRESENT: D. Menard and C. Saunders.

REGRETS: T. Fowler.

I YOUR COMMITTEE RECOMMENDS:

Planning and
Policy Sub-
Committee

1. (i) That the following actions be taken with respect to the attached Planning and Policy Sub-Committee (PPSC) Minutes from its meeting held on September 10, 2012:

- a) the Civic Administration **BE ASKED** to provide the PPSC with a list of vacant heritage properties, as outlined in the 2006 *Inventory of Heritage Resources*, to allow the PPSC to provide comments to the LACH at a future meeting;
- b) the Civic Administration **BE ASKED** to provide written interpretation on Section 34 (2) of the *Ontario Heritage Act*, with respect to the types of conditions that can be imposed when Council consents to a demolition application, including future site plan approval; and,
- c) the attached Solar Panel Guidelines for Designated Heritage Properties **BE ADOPTED** as an official City of London guideline document;

it being noted that the LACH heard a verbal presentation from D. Dudek, Sub-Committee Chair, with respect to these matters.

Stewardship
Sub-Committee

2. (iii, 9) That the following actions be taken with respect to the Stewardship Sub-Committee Minutes from its meeting held on August 28, 2012:

- a) the Stewardship Sub-Committee **BE REQUESTED** to prepare Statements of Significance for all pioneer cemeteries that have not been designated;
- b) the Heritage Planner **BE REQUESTED** to work with the Westminster-Delaware Historical Society to identify and plaque the pioneer cemeteries that were located in the former Westminster Township; and,
- c) the Heritage Planner **BE REQUESTED** to forward the Statement of Significance, for the property located at 1170 Wilton Grove Road, to the owner for signature;

it being noted that the LACH heard a verbal presentation from J. Lutman, Sub-Committee Chair, with respect to these matters.

Heritage
Planner's
Report

3. That the following actions be taken with respect to the Heritage Planner's Report:

- a) the Stewardship Sub-Committee **BE REQUESTED** to prepare a Statement of Significance for the Priority 1 building located at 2332 Main Street, Lambeth; and,
- b) the Stewardship Sub-Committee **BE REQUESTED** to prepare a Statement of Significance for the Priority 1 building located at 591 Maitland Street;

it being noted that the Heritage Planner also advised of the following:

- the London Public Library will be presenting an "Architecture in Film" series;

- the "Freedom Tree" in Westminster Ponds is being renamed the "Meeting Tree" and Trees Ontario will be putting a plaque near the tree at a ceremony to be held in September, 2012; and,
- Doors Open and Culture Days events have been combined and will be held the last weekend in September.

Heritage
Alteration
Permit
Application – B.
Iaboni – 642
Princess
Avenue

4. (8) That, on the recommendation of the Director, Land Use Planning & City Planner, with the advice of the Heritage Planner, the Heritage Alteration Permit Application of B. Iaboni, requesting permission for changes to the roof, façade, including painting some of the bricks around the window, and porch of the designated heritage property located at 642 Princess Avenue, **BE APPROVED**; it being noted that the Heritage Planner has reviewed the proposed changes and has advised that the impact of such alteration on the heritage features of the property identified in the Reasons for Designation is negligible; it being further noted that the London Advisory Committee on Heritage heard a verbal presentation from Mr. Iaboni, with respect to this matter.

II YOUR COMMITTEE REPORTS:

Orientation 5. That the London Advisory Committee on Heritage heard the attached Orientation presentation from C. Saunders, City Clerk.

199 Queens Avenue 6. That the London Advisory Committee on Heritage (LACH) supported the request of S. Farhi, Farhi Holdings Corporation, to demolish the heritage property located at 199 Queens Avenue; it being noted that the LACH received the attached presentation from S. Farhi, with respect to this matter.

Education Sub-Committee 7. (ii) That the London Advisory Committee on Heritage was advised by D. Menard, Heritage Planner, that the plaque for the property located at 84 Commissioners Road East is too large and the supplier is making a smaller plaque for the property.

Archival Sub-Committee 8. (vi) That the London Advisory Committee on Heritage was advised by G. Goodlet, on behalf of the Archival Sub-Committee (ASC) that the ASC will be meeting with J. Purser, Manager of Records & Information Services, and representatives of Middlesex County to discuss the possibility of having a joint City/County archive.

Tempo VII Sub-Committee 9. (vii) That the London Advisory Committee on Heritage was advised that D. Dann would like to participate on the Tempo VII Sub-Committee.

Heritage Conservation District Representative 10. (viii) That the London Advisory Committee on Heritage was advised by D. Menard, Heritage Planner, that there will be a community meeting at the Elmwood Presbyterian Church to discuss the draft guidelines for the proposed Wortley Village-Old South Heritage Conservation District.

Woodfield Developments Inc. – 390 Princess Avenue 11. (3) That the London Advisory Committee on Heritage (LACH) received a Notice, dated August 17, 2012, from Barb Debbert, Senior Planner, with respect to an application submitted by Woodfield Developments Inc., relating to the property located at 390 Princess Avenue. The LACH asked that the applicant be invited to attend the next meeting of the LACH to provide further details on this application.

Communication of LACH Meetings 12. (Add) That the London Advisory Committee on Heritage (LACH) was advised that J. Nelson and S. Potter will provide a proposal to a future meeting of the LACH to allow portions of the LACH meeting to be broadcast through social media, such as Twitter or a blog post.

13. That the London Advisory Committee on Heritage received and noted the following:

1st Report of the LACH (a) (1) the 1st Report of the London Advisory Committee on Heritage from its meeting held on August 8, 2012;

York
Developments
– 3313, 3341
and 3405
Wonderland
Road South

(b) (2) a Notice, dated August 10, 2012, from Barb Debbert, Senior Planner, with respect to an application submitted by York Developments, relating to the properties located at 3313, 3341 and 3405 Wonderland Road South;

Sifton
Properties
Limited – 1451,
1311 and 1383
Wharnccliffe
Road South

(c) (4) a Notice, dated August 21, 2012, from Terry Grawey, Senior Planner, with respect to an application submitted by Sifton Properties Limited relating to the properties located at 1451, 1311 and 1381 Wharnccliffe Road South;

Dr. Afzal
Mohammed –
510, 518 and
526 Southdale
Road East

(d) (5) a Notice, dated August 27, 2012, from Ethan Ling, Planner II, with respect to an application submitted by Dr. Afzal Mohammed, relating to the properties located at 510, 518 and 526 Southdale Road East;

Moubarak
David – 1494
Commissioners
Road West

(e) (6) a Notice, dated August 21, 2012, from Craig Smith, Planner II, with respect to an application submitted by Moubarak David, relating to the property located at 1494 Commissioners Road West; and,

1st Report of
the LACH

(f) (7) a Municipal Council resolution adopted at its meeting held on August 28, 2012, with respect to the 1st Report of the LACH, from its meeting held on August 8, 2012.

14. That the London Advisory Committee on Heritage (LACH) passed the following resolution prior to moving in camera from 7:55 p.m. to 8:03 p.m.:

“That the London Advisory Committee on Heritage move in camera to consider a matter pertaining to personal matters about identifiable individuals, including municipal or local board employees, relating to the 2013 Mayor’s New Year’s Honour List and the 2012 Ontario Heritage Community Recognition Award.” (See Confidential Appendix to the 2nd Report of the London Advisory Committee on Heritage.)

Next Meeting

15. That the London Advisory Committee on Heritage will hold its next meeting on October 10, 2012.

The meeting adjourned at 8:34 p.m.

1

LACH

Planning and Policy Subcommittee - September 10, 2012

Present: Derek Dudek (chair), Jim Cushing, Greg Thompson, Trevor Fowler, Stephanie Potter, Wes Kinghorn, Don Menard

At its meeting of September 10, 2012 the Planning and Policy Subcommittee discussed the following matters for consideration by LACH:

1. Delegation of Authority By-law (re: minor alterations - Heritage Planner)

The P&P Subcommittee was advised by the City's heritage planner that a draft by-law was being reviewed by City Planning staff with consideration that the Planning Manager with direct supervision of the Heritage Planner would be the delegated authority. It was noted that a further draft of the by-law may be returning to LACH in late 2012 for comment.

No action required.

2. 20-year Official Plan review

The P&P subcommittee will provide a summary of policies currently in the Official Plan and possible amendments at the October LACH meeting for further consideration.

No action required.

3. PPS review – heritage matters – Chair to provide update

The P&P subcommittee discussed the status of possible amendments to the Provincial Policy Statement 2005. It was noted that the PPS 2005 was currently being reviewed at the Provincial inter-ministerial level and that a draft document may be available for public review in late 2012.

No action required.

4. Heritage Tree program – P&P to research Ontario Heritage Tree Alliance and Trees Ontario information (attached)

The P&P subcommittee discussed at length whether there were sufficient tools in place to designate trees for heritage value on private property. Further research is required to determine what tools are available for designating trees not located on real property. The P&P subcommittee is intending to provide further information to LACH at the October meeting.

No action required.

5. Property Standards By-law for Heritage Buildings

THAT the LACH request of the City to provide them with a list of vacant "listed" heritage buildings of all types (residential, commercial, industrial, etc) for further consideration by the P&P Subcommittee to determine what future actions may be necessary.

6. Demolition Permits – ability to attach conditions re: site plan approval (Section 34 (2)(a)(i.1) of the OHA)

THAT the LACH request that the City provide written interpretation of the legal authority to request that a condition of site plan approval can be attached to an application for a demolition permit on designated heritage properties.

7. Solar Panel Guidelines

THAT the LACH request to the City to finalize the LACH endorsed *Solar Panel Guidelines for Designated Heritage Properties* as an official City of London guideline document which could be made available for public review.



London Advisory Committee on Heritage Guidelines on the Installation of Solar Panels on Designated Properties

**DRAFT
FOR APPROVAL**

Preamble

Heritage buildings must adapt to survive. In most cases, the most distinctive features of designated buildings can be preserved while also accommodating solar energy installations. Indeed, as the need for renewable energy systems increases, technology evolves, political pressure to remove regulatory barriers mounts, and logistical problems are resolved, refusing the installation of solar energy systems may become indefensible. Applications to install solar and other alternative energy systems within heritage conservation districts are likely to increase dramatically.

The following considerations should be used by the London Advisory Committee on Heritage in its review of Heritage Alteration Permits that contain a request for the installation of solar panels.

The primary objective of heritage designation is to preserve heritage features or facades, so LACH will encourage alteration outcomes that meet solar access requirements while maintaining the integrity of designated properties. Consideration should always be given to solutions that protect heritage features, materials, and spatial relationships, with the visibility of all solar energy installations – including solar panels – minimized to the greatest extent possible.

Guidelines

1. **Locate solar panels on the grounds of a heritage property.** If possible, use a ground-mounted solar panel array. Consider solutions that respect the building's historic setting by locating arrays in an inconspicuous location, such as a rear or side yard, low to the ground, and sensitively screened to further limit visibility. Care should be taken to respect the historic landscape, including both its natural (i.e. topography) and built (i.e. materials) features.
2. **Locate solar panels on new construction.** In cases where new buildings or new additions to designated buildings are proposed and approvable, encourage the placement of solar panels on the new construction. To achieve overall compatibility with the designated building and its setting, consider solutions that integrate the solar panel system in less visible areas of the new design.
3. **Locate solar panels on non-designated buildings and additions.** If the grounds cannot accommodate solar panels and the project does not include new construction, consider placing solar panels on an existing, non-heritage addition or accessory structure. This will minimize the impact of solar installation on the significant features of the heritage resource and protect the historic fabric against alteration.
4. **Place solar panels in areas that minimize their visibility from the street.** The primary façade of a designated building is often the most architecturally distinctive and publicly visible, and thus the most significant and character defining. To the greatest extent possible, avoid placing solar panels on street-facing walls or roofs, including those facing side streets. Installations below and behind parapet walls and dormers or on rear-facing roofs are often good choices.
5. **Avoid installations that would result in the permanent loss of significant, character-defining, or designated features of heritage properties.** Solar panels should not require alterations to significant or character-defining features of a historic resource, such as altering or interfering with existing roof lines or dormers. Avoid installations that obstruct views of significant architectural features (such as overlaying windows or decorative detailing) or intrude on views of neighbouring properties in a heritage conservation district.
6. **Avoid solutions that would require or result in the removal or permanent alteration of historic fabric.** Solar panel installations should be reversible. The use of solar roof tiles,

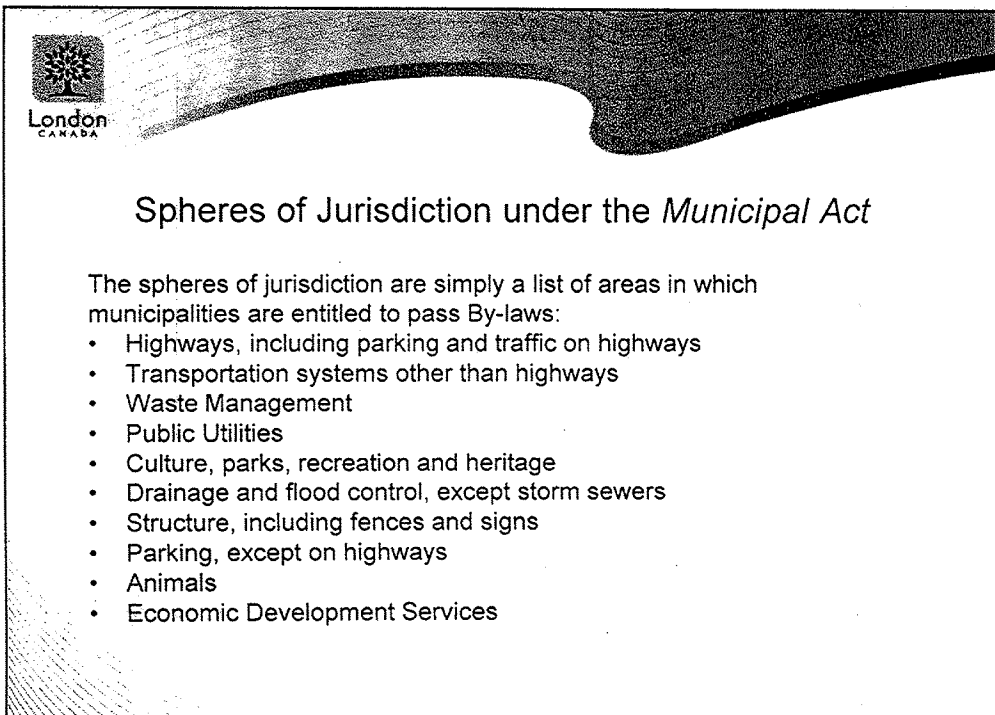
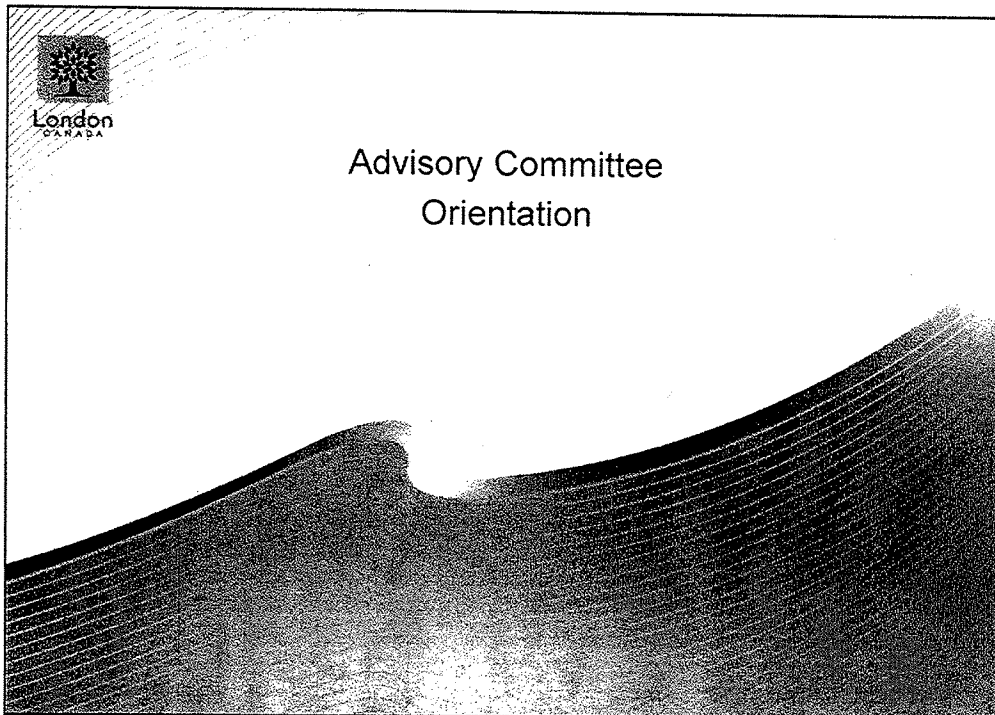



laminates, glazing, and other technologies that require the removal of intact historic fabric or that permanently alter or damage such fabric must be avoided. Consider the type and condition of the existing building fabric for which solar panels installation is proposed, as well as the method of attachment and future removal. Minimizing the number of points of attachment, including the use of brackets, will avoid damaging historic fabric.

7. **Require low profiles.** Solar panels should be flush with the existing roof surface and roof line. They should not be visible above the roof line of a primary façade.
8. **On flat roofs, set solar panels back from the edge.** Because they are generally hidden from view, flat roofs can provide an ideal surface for solar panel arrays. To ensure that a solar installation is minimally visible, set the solar panels back from the roof's edge as far as possible and adjust the angle and height of the panels as necessary to ensure that the panels are not visible from the street.
9. **Avoid disjointed and multi-roof solutions.** Solar panels should be set at angles consistent with the slope or pitch of the supporting roof. In addition, solar panels should be located on one roof plane (as opposed to scattered among several roofs) and arranged in a pattern that matches the general shape and configuration of the roof upon which they are mounted.
10. **Ensure that solar panels, support structures, and conduits blend into the surrounding features of the historic resource.** The overall visibility and reflectivity of solar panels and their support structures can be substantially reduced if elements of the solar installation match the surrounding building fabric in color. The trim work on the panels, any support structures and conduits should be painted, finished or stained to match the predominant colour of the surrounding materials.

Note: These guidelines are adapted with permission from the National Trust for Historic Preservation.


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What can Municipalities do under the Spheres of Jurisdiction

- By-laws passed under the spheres of jurisdiction allow:
 - regulation or prohibition of activities
 - the ability to make people do things, provide for licenses, permits, approvals, and registrations, and to impose conditions for the granting of licenses, approvals and registrations




Role of Council

Under the *Municipal Act* it is the role of Council

- to represent the public and to consider the well-being and the interests of the municipality
- to develop and evaluate the policies and programs of the municipality
- to determine which services the municipality provides
- to ensure that administrative practices and procedures are in place to implement the decisions of Council
- to maintain the financial integrity of the municipality and
- to carry out the duties of Council under this or any other Act

5

13/09/2012




London
CANADA

Role of Municipal Administration

Under the *Municipal Act* it is the role of the officers and employees of the municipality

- to implement council's decisions and establish administrative practices and procedures to carry out council's decisions
- to undertake research and provide advice to council on the policies and programs of the municipality and
- to carry out other duties required under this or any Act and other duties assigned by the municipality




London
CANADA

Advisory Committee Jurisdiction

- provide recommendations, advice and information to Municipal Council on those specialized matters which relate to the purpose of the advisory committee
- to facilitate public input to City Council on programs and ideas to assist in enhancing the quality of life for the community in keeping with the City's Strategic Plan
- advisory committees shall not give direction to the Civic Administration or any local board or commission
- advisory committees shall not request, without approval of City Council, the preparation of any administrative reports, research or work assignments
- advisory committees may ask the Civic Administration for information and data when, such requests can be reasonable accommodated within the existing workload


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13/09/2012




Standing Committees

- advisory committees recommendations are forwarded to the Standing Committee having jurisdiction over the matters being considered by the advisory committee by means of a Report
- the Reports are prepared by the committee's recording secretary
- the advisory committee chair, or their designation, may be requested by the standing committee, to be a delegation to the standing committee meeting to provide further information or clarification
- the advisory committee chair, or designate shall accurately represent the views of the advisory committee as a whole




Appointment Process

- current term expires February 28, 2015
- in September 2014, City Council will be inviting applications for the term commencing March 1, 2015 to February 28, 2019
- a Striking Committee will be appointed to review the applications and provide recommendations to City Council for consideration in November 2014
- vacancies that occur throughout the term will be considered by the Finance and Administrative Services Committee



Advisory Committee Code of Conduct

- abide by the provisions of the Ontario Human Rights Code, City of London polices and any other applicable related statutes
- treat every person, including other committee members, corporate employees and the public with dignity, understanding and respect
- act in the best interest of the municipality
- members shall not place themselves in a position where they are under any obligation to any person or organization who may seek preferential treatment
- members shall not place themselves in a position where they could derive any direct benefit or interest from any matter about which they can influence a decision




Municipal Conflict of Interest Act

- advisory committee members are required to disclose when they have any pecuniary interest in a matter to be considered at a meeting
- the disclosure of a pecuniary interest shall be made prior to consideration of the matter and the general nature of the interest must be disclosed
- members must remove themselves from the table for the duration of time that that the matter is being considered and during in-closed session leave the room and shall not attempt in any way before, during or after the meeting to influence the voting on the matter


5

13/09/2012



Role of the Chair

- to act as a facilitator for the advisory committee
- to monitor issues to ensure adequate input and discussion
- to represent the advisory committee and to present its recommendations to the appropriate Standing Committee
- to remind the advisory committee of its mandate, purpose and mission



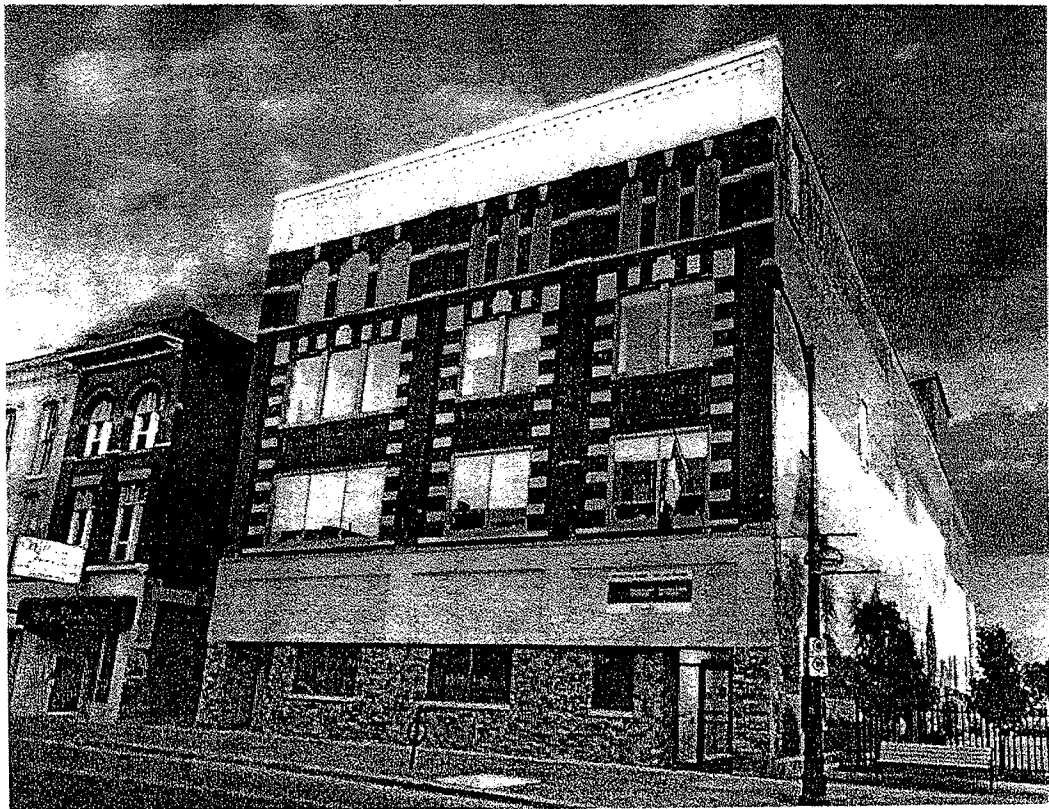
Meeting Guidelines

- before speaking, wait to be recognized by the Chair
- when speaking to a motion, confine remarks to the motion
- do not speak more than once to a motion, until all who desire to speak have spoken once
- please do not interrupt the person who is speaking
- questions should be addressed through the Chair
- motions must be seconded before being debated or put to a vote
- business which is not on the agenda will not be considered unless it is an emergency or it relates to a specific agenda item

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To the members of the London Advisory Committee on Heritage

I am coming before you to ask for your approval of the demolition of the building at 199 Queens Avenue. I believe my record in this community clearly shows I am a supporter of heritage preservation, and I have spent millions of dollars in related efforts. But preserving heritage sometimes requires us to look beyond an individual building to the welfare of many others. That is the situation here, and I hope you will allow me to put that statement in context.



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Pictured on the previous page is **197-199 Dundas Street**. Built in the late 1800's, it was long known as the Fairweathers building. The majority of the 3rd and all of the 4th floors have remained vacant for the past 25 years. It has a negligible 4 parking spaces to the rear of the building. Total empty space: 15,000 square feet.



This is **204-206 Dundas Street**. The former Capitol Theatre and Bowles Lunch buildings were essentially reconstructed literally from the ground up at a cost of \$3.5 million, a sum that will not be recaptured even after a 20-year lease to the City of London (please see London Free Press article on last page). These buildings actually have some very limited contiguous parking to the rear, but not as much as could be put to use.

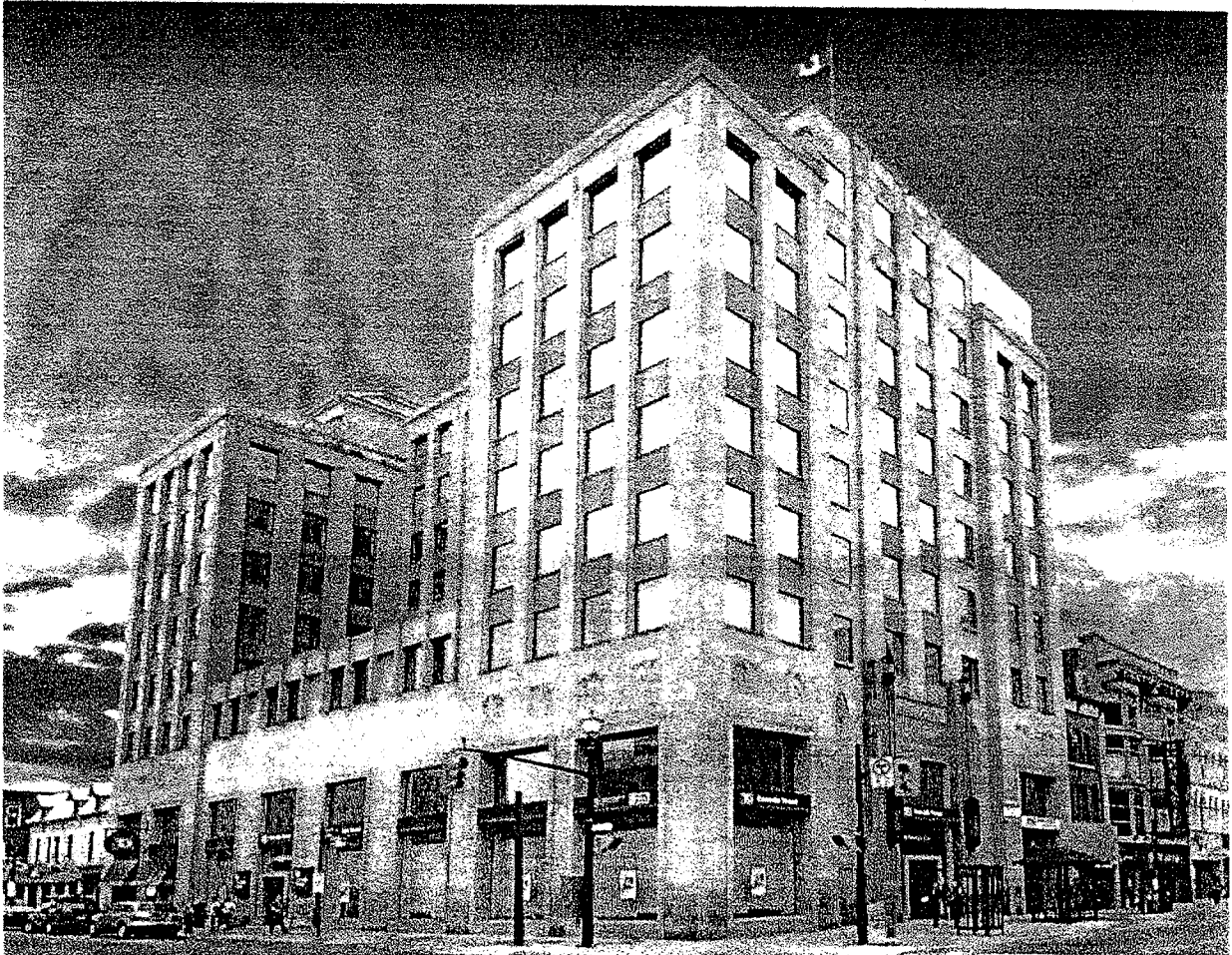
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Above is **215 Dundas Street**, the former Duffield Block, built in 1871. Currently empty except for a fast-food restaurant on the ground floor, its 2nd floor has been vacant for over 10 years and the 3rd for 5 years. It is a beautiful building that suffers the common downtown fate of having no attached or convenient parking.

Total empty space: 10,000 square feet.

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This is **220 Dundas Street**, built in 1931 as the original home of the Huron and Erie Savings and Loan, forerunner of TD Canada Trust. With the 3rd, 5th and 7th floors vacant for the past 11 years, it is currently sitting at just over 60% occupancy. It, too has no attached parking.

Total empty space: 25,000 square feet.

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Above is **229-231 Dundas Street**. Built in 1877 as the Majestic Theatre and most commonly known as the Scott's Building. The front half of the 3rd floor has been empty for 8 years and the entire 4th floor has been unoccupied for 22 years. It is unrentable for

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most uses because it does not offer accessibility to the handicapped, and the cost of retrofitting is not an economically viable proposition. We and the former owner spent \$1.5 million restoring the beautiful façade, and an additional \$3.5 million on base building and leasehold improvements to bring the structure up to modern office standards (save for the upper-floor accessibility issues). Even for prospective clients for whom that would not be a problem, like most of our other downtown heritage buildings it has no parking.

Total empty space: 17,000 square feet.

We were recently advised that the major tenant at 229-231 Dundas, the Federal Tax Courts, will be vacating 8,000 square feet at the end of this year and leaving the city. They were a unique user in that they required only 4 parking spaces and were able to negotiate them with Citi Plaza, something that can no longer be arranged since it became primarily an office building and no longer rents space to 'competitors'.

(That, by the way, is why I purchased so many heritage buildings that had no parking. Until the Galleria failed as a retail mall and was re-purposed as primarily offices, we were able to lease virtually as many parking spaces as we needed or would need for our office buildings. But when the now-Citi Plaza went into competition with us for office tenants, they refused to lease us any spaces at all. That has remained a very large problem for us ever since.)

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This is **424 Wellington Street**, known as the Wright Lithography building. It does have limited parking to the rear, but that could change with potential redevelopment of that space. Another major disadvantage of this building is the high expense required to comply with newer building, safety and accessibility codes. The cost is so high that likely only a single company seeking a prestige location will eventually locate there. It has been unoccupied for the past 6 years and looks to stay that way for some time yet. **Total empty space: 16,300 square feet.**

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This is **305 Queens Avenue**. Built in 1937 as the **Elsie Perrin Williams Memorial Library, Art Gallery and Museum**.



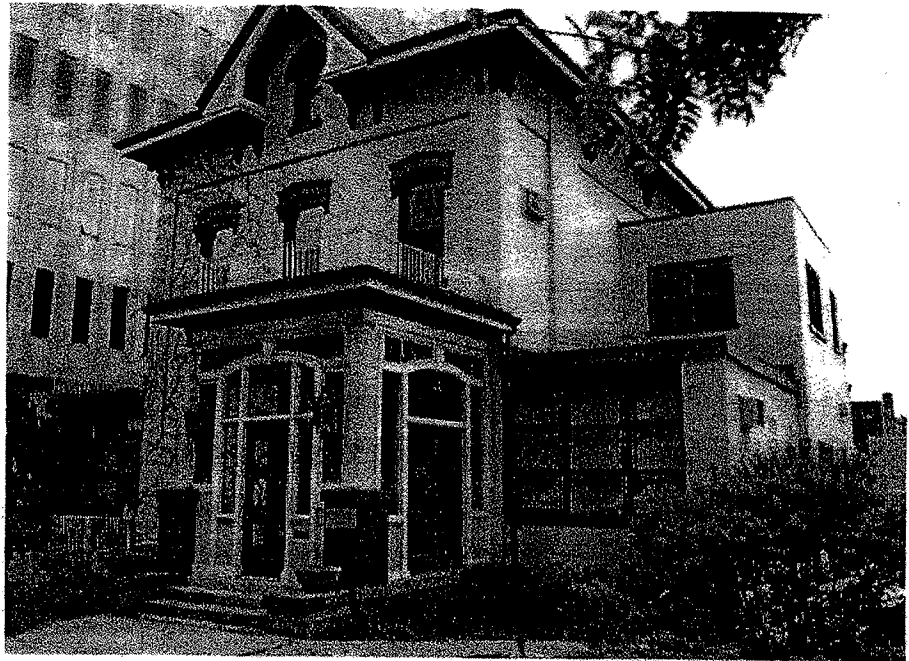
It has been without a tenant for more than 7 years. It does have limited parking but future development of the parking area could severely restrict the amount available. Removal of extensive asbestos, as required by law, left the building essentially an empty shell, requiring a total interior rebuild to make it useable again, estimated at \$8.3 million. For the right tenant this will be well worth the investment and it will make outstanding premises, but in the meantime it remains vacant.

Total empty space: 90,000 square feet.

If these beautiful and important pieces of London's architectural heritage are to survive, we need to find tenants to fill them. People are the lifeblood that keeps old buildings alive but in order to attract and keep them we must be able to provide parking for the now-empty office space.

(6)

This is 199
Queens
Avenue, the
subject of our
current
concern. It has
lost much of its
exterior
architectural
originality due
to successive
add-ons, and
major
modifications



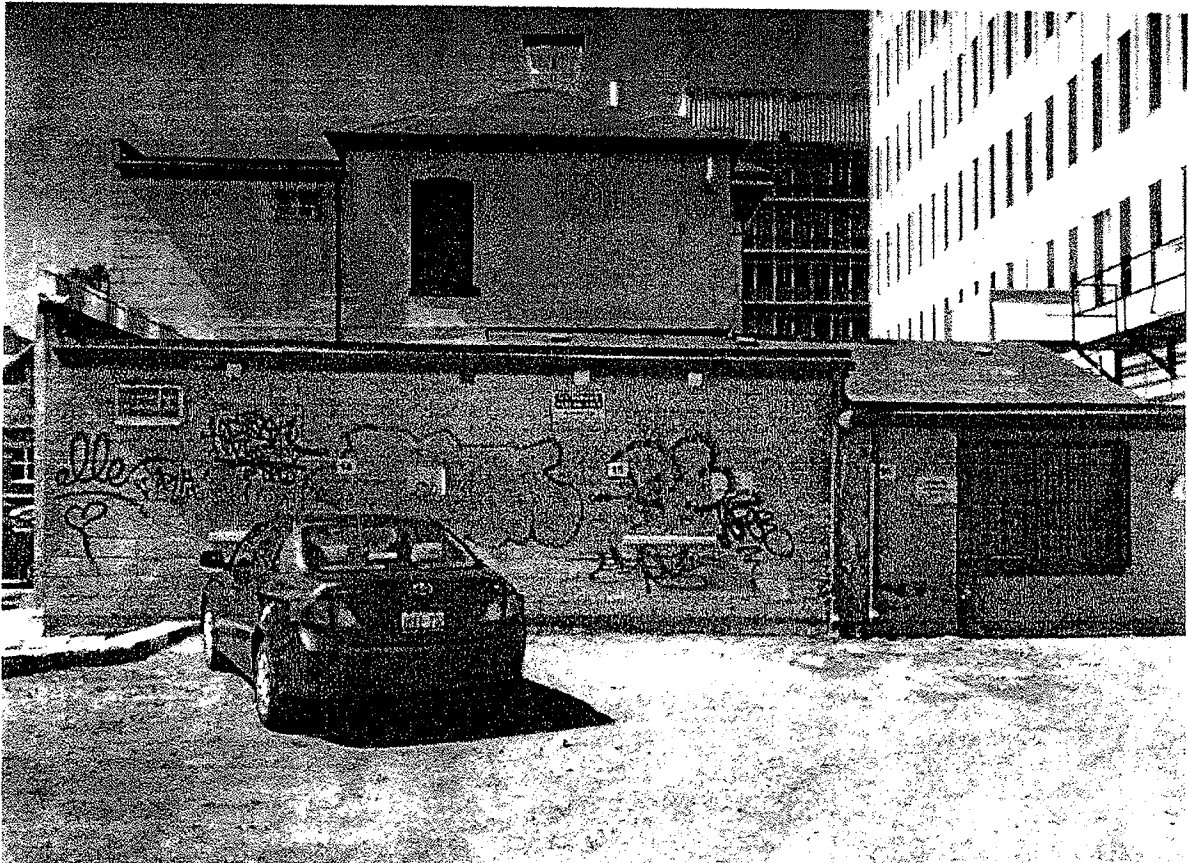
have turned the interior into a dog's breakfast. A previous owner seriously neglected required maintenance and upkeep and the building has suffered accordingly. They also tacked on various additions almost at random, creating a very unsightly exterior covering serious structural deficiencies within.

But the biggest impediment to this building's future is the current Human Rights legislation that prohibits the use of non-accessible premises by any government or government-related organizations. I discovered this the hard way when I offered space to the City in the historic Labatt House overlooking Victoria Park. This is an outstanding location, and there was genuine interest at City Hall. But as soon as it was realized the building could not be made accessible for the handicapped, that was the end of all discussions.

The same restrictions apply to any commercial office use where public access is required. Could 199 Queens Ave be made handicapped-accessible? Not at a price that would allow it to be subsequently rented. The math just doesn't work.

⑥

The existing interior doorways are too narrow to allow access to wheelchairs, requiring major and expensive structural re-engineering. There are differences in floor heights and internal steps between some of the rooms, too, further limiting wheelchair use unacceptably unless they are eliminated at significant expense. The placement of existing exterior doors and the internal layout of the building would mean the legally-required handicapped-accessible elevators would have to be located on the outside, which would be both unsightly and prohibitively expensive (approximately \$289,000).



Without the possibility of a government or related tenant, the only use for 199 Queens Ave that makes even remote fiscal sense is as private office space that would not be open to the public and consequently exempt from accessibility legislation. But even with

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such a tenant available (and they are few and far between) the building requires so much remedial work to make the facilities competitive that the resulting lease payments would be unacceptably high. For considerably less rent per square foot we could provide better space in nicer downtown heritage structures we already own within a block's distance.

Even so, I contacted the major local real estate firms to research the market. They all said the same thing: Given the current glut of empty office space in the downtown, none of them has any confidence they could find a tenant for the building, given its poor overall condition and lack of handicapped accessibility.

When I asked about its prospects if we were to bring it into compliance with the latest legislation and codes, and suggested the rents we would require in order to recover our investment, none of them even wanted the listing.



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As a result, 199 Queens is empty now except for a small hairdressing shop in a rear addition, the proprietor of which has indicated her poor opinion of the condition of the property. But unsecured empty buildings in the downtown tend to attract squatters and vandals, creating potentially-costly liability issues. To protect the public and my company I would have no choice but to board up the building. Sadly, that would create an unneeded eyesore between the modern office building at 201 Queens and the venerable London Club.

A much more productive and useful solution would be to take the building down and build an attractive new, multi-purpose structure on the site, and I am prepared to do so. We are currently working with our architects on the design of a building that would include a main-floor retail component, several storeys of parking above, and several



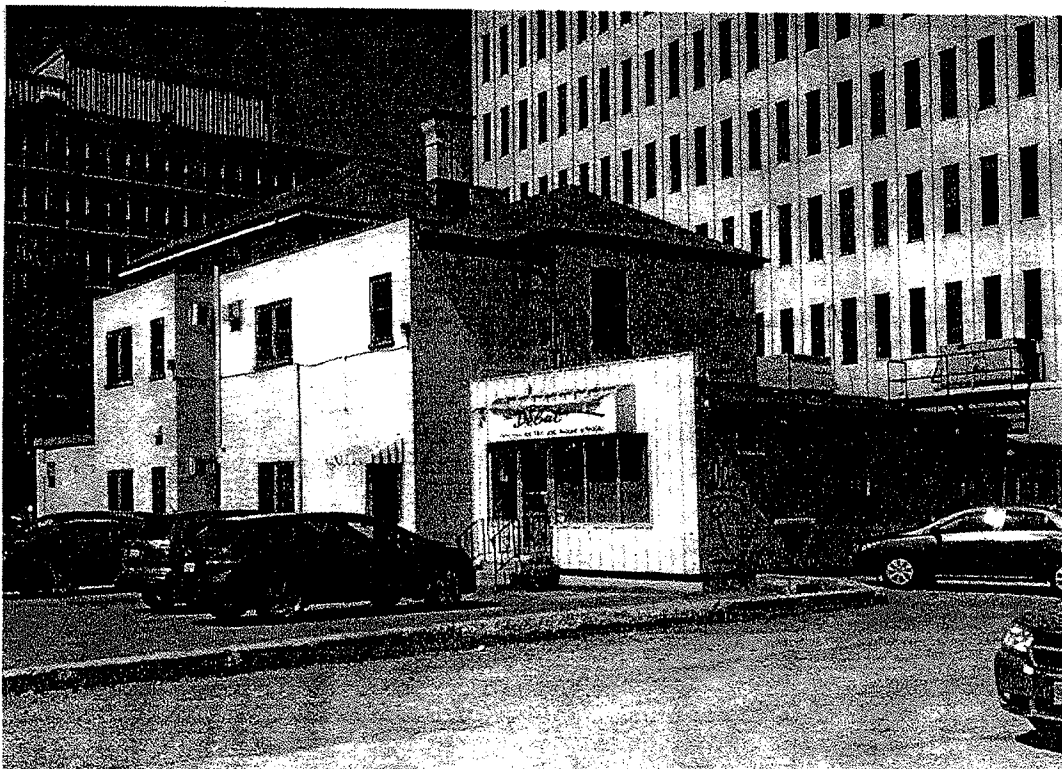
more floors of quality residences above that. The building would be well-built, attractive, and in keeping with the architectural values of the downtown. The parking component is most crucial

because of the restored heritage properties we have noted above, all located within a block or so of this site. In addition to significant vacancies, they have little or no parking available for potential tenants. That makes the remaining vacant space in them virtually

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unrentable. These buildings are heritage gems, but even where accessibility is not a problem we have found it impossible to fill them without sufficient parking close at hand.

When the Federal Tax Courts vacate 229-231 Dundas St. at the end of the year, that will push our empty square footage in downtown heritage buildings to more than 180,000 square feet. If we were lucky enough to find tenants for all of them, we would require room to park an additional 720 vehicles, based on the standard of 4 parking stalls per 1,000 square feet of office space. Even if half the new tenants took public transit or rode bicycles, we would still need 360 new spaces. There is nowhere near that amount of space available in the core and without it our chances of leasing these landmark buildings remain very slim.



Farhi Holdings has proved its commitment to heritage preservation. We have invested millions in improving and retro-fitting the buildings we own, and lost millions more

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because we cannot reduce our vacancies without being able to increase the parking we can offer.

Yet we continue to spend a lot of money to ensure they remain in top-notch condition because we maintain our belief in downtown London's long-term future. If we could find a way to recover the cost of salvaging 199 Queens Ave we would certainly do so. Sadly, the numbers just don't add up.

But the good news is that we could see a phoenix rise from its demolition. Our proposed new structure will help meet the needs of our recovering downtown and provide the additional parking that is vital to the long-term preservation of our most noteworthy heritage structures in the core. The new retail and residential components on the site will be important additions to the future of our downtown, but it is particularly the creation of so many new parking spaces that will play a crucial role in saving the most important landmarks of earlier generations.

I respectfully ask LACH to consider the above facts, and lend its support to what is not a step backward in heritage preservation, but a clear step forward in our efforts to ensure the ongoing survival and vibrancy of many of our most noteworthy downtown heritage structures.

Sincerely yours,



Shmuel Farhi

September 12, 2012