



April 25th, 2019.

City of London,
300 Dufferin Ave.
London, ON N6A 4L9

Attention : Councillor A. Hopkins (Chair) & members of PEC

Re: Victoria Park Secondary Plan – Status Update and Draft Secondary Plan Principles

Please be advised of the following submission to be considered in addition to the numerous other comments provided to staff as part of the Victoria Park Precinct Secondary Plan. We believe the approach taken by Staff to seek endorsement of a limited number of Principles within ongoing public consultations is a disservice to the process and confuses participants on their contributions moving forward. Given there has not been a complete analysis of the various comments received or a review of the area completed to formulate proper principles, any endorsement is premature.

We have been in attendance at the public meetings and have witnessed a public process that identifies groups in support of change and intensification as well as a group seeking the status quo. We submit that the evolution of a City's core is something that should be embraced as it is the evolution of the core that provides vitality to the City. We agree with the submissions that Victoria Park is a special place and it's this amenity that has triggered the desire to intensify the area and to fulfill many of the goals of the London Plan for Central London. The same can be said for Woodfield, however, it must be acknowledged that Woodfield is not a homogeneous neighbourhood and opportunities exist for intensification without significant impacts and we have sought dialogue regarding the assessment and continue to do so.

The review of the planning context is the purpose of the Secondary Plan and to evaluate the opportunities that exist which can only be accomplished with a full understanding of the area and its context. Further discussion of the anticipated evolution of the area is needed to determine how this can contribute to a better City of London. This objective cannot be accomplished without an understanding of the development anticipated for Wellington Street Corridor as this dictates the evolution of the area. There are substantial lands currently recognized in existing zoning at heights greater than 18 storeys and this will influence our site within this context. There seems to be resistance to acknowledging 'as-of-right' zoning which should concern Council. Instead of resistance, we would suggest utilizing this as the opportunity that it provides, especially given the locational attributes that exist.

The process to date has lacked focus and seems the messaging has deteriorated as many comments from the Public seem to fear the development of Victoria Park itself. The process needs to be redefined and clarity provided so as not to confuse the participants. I

can appreciate the confusion felt by some of the participants given we are now asking Council to endorse principles only weeks after the last public session conquered three development concepts for the area (Low-Medium-High), a process I like to term the 'Goldilocks' concepts. It is not surprising to hear a reaction regarding heritage when two of the three concepts show massive 35 storey towers enveloping St Peter's Basilica which obviously evoked a strong response from all of us.

We have suggested in our submissions that staff incorporate a similar approach utilized in the preparation of the London Plan where they changed areas within a Low Density Residential neighbourhood designation to an Urban or Transit Corridor Place Type. The attributes of these areas have similar issues as this Secondary Plan. The height increase to up to 18 storeys immediately and directly abutting single family homes in a stable neighbourhood, some within Heritage Districts (Bishop Helmuth or Blackfriars) which is similar to Woodfield or perhaps even more intrusive as these are within stable neighbourhoods with rear yard private amenity spaces. Surely a similar approach would be applicable in this circumstance. Staff has not completed an analysis of the abutting lands and the impacts, determination of transitional or stable areas nor have they determined a measuring stick in determining acceptable impacts and therefore we respectfully submit that we are premature in the establishment of Principles to direct the formation of a Secondary Plan for this area.

We cannot have a process that has iterative endorsements as is being proposed. The process should be left to its evolution and to endorse principles limits the Secondary Plan's ability to address issues and undertake a legitimate analysis of the area and the specific impacts. It is the role of Planning staff to undertake this analysis and to provide the framework for the decisions that will be needed to determine the evolution of this area. It should not be limited by the stated principles and there is significant work still required to be undertaken. The process requires additional time; additional analysis and additional dialogue. There is no reason to accept the limited approach taken in the Staff report as it does not reflect the totality of the work that is ongoing and is not representative of the two voices of the public, as noted in the attachment, "The Two Voices of Woodfield" as prepared by Blackridge Strategy.

We would therefore request that the report be received for information and that no endorsement of the stated Principles be given. If you have any questions or would like to discuss any specifics, please contact me directly at your convenience.

Yours truly,
Auburn Developments Inc.,



Per; Stephen Stapleton,
Vice President

Attachment: "The Two Voices of Woodfield", by Blackridge Strategy