

April 26, 2019

File No: 11054

**Re: Victoria Park Secondary Plan
Status Update and Draft Principles
Planning and Environment Committee – April 29, 2019**

To Councillor A. Hopkins (Chair) and Planning and Environment Committee members:

We are the planning consultants for 560 Wellington Holdings Inc, owners of 560 and 562 Wellington Street (the “site”), which is contained within the study area for the ongoing Victoria Park Secondary Plan process. Situated on the east side of Wellington Street facing Victoria Park, the site is approximately 0.22 hectares in size and is currently occupied by a 5-storey office building and a 2-storey office building.

By way of background, GSP Group filed applications on behalf of 560 Wellington Holdings in December 2014 to amend the 1989 Official Plan and Zoning By-law to allow the redevelopment of the site for a new residential building with ground floor commercial uses. Further to public meetings and committee review, the proposed development was refined and the applications were re-submitted. Further refinements were discussed with City staff; however, they were not advanced past that point given ongoing concerns.

The need for the Secondary Plan specifically arose in response to our proposed applications through the May 8, 2018 consideration of the application by the Planning and Environment Committee at which Council directed the “*review of the existing plans, policies, and guidelines applying to the properties surrounding Victoria Park and to consider a comprehensive plan for the properties surrounding the Park*”. We have been following the Secondary Plan process and attending the engagement sessions to date. Representatives from 560 Wellington Holdings and GSP Group have attended the prior community information meetings for the Study. Both 560 Wellington Holdings and GSP Group submitted letters providing comments and input concerning the January 24, 2019 community meeting’s materials and information.

We have reviewed the staff report for the April 29, 2019 Planning and Environment Committee concerning the Victoria Park Secondary Plan status and draft principles. We note that the set of draft principles has expanded to 10 principles from the 6 principles presented in

January 2018. From a planning perspective, while our client doesn't necessarily disagree with the intent of these 10 principles, their general nature and subjective interpretation is challenging without an understanding of how they manifest in terms of policies. These principles must be read together with the implementing policies of the Secondary Plan to fully understand the vision for the Victoria Park Precinct. While we reserve any detailed comments until the Draft Secondary Plan is available for consideration, there are several general points of concern regarding the process to date that we offer for your consideration.

First, the progression of the Study has been challenging to follow. It has generally proceeded from the discussion of ideas and principles through to the formulation of development scenarios, and now returning to endorsement of principles. While we agree that establishing higher-level principles at the outset is common on most area-based land use planning exercises, it is unclear of the purpose of this step at this point in the process. Our client's concern is that this is meant to pre-determine a development scenario for the Precinct prior to presentation of the draft Secondary Plan, in the interest of making it more palatable at the time of consideration. The short timeframe between April 29, 2019 and the intended consideration of the draft Secondary Plan in June 2019 reinforces this concern.

Second, a comprehensive plan for the Precinct warrants a "fresh" look at the policy and physical context surrounding the park. Our client and ourselves have consistently stressed that the east side of the park along the Wellington Street corridor is distinct from the remainder of the Woodfield neighbourhood. This distinction is due to its historic evolution, present uses and form, and current applicable policies. We would expect that such a distinction warrants a review of existing/proposed policies and existing conditions to determine what is appropriate. We have not seen, however, anything in the first two consultation sessions that suggests such a background review and assessment has been done as part of the Secondary Plan.

Third, height and intensity of development is the crux of the Secondary Plan. It was the reason it was initiated and has generated much of the discussion and opposing views through consultation. The characterization of Woodfield as a low-rise residential neighbourhood is not factually correct, as Woodfield contains portions that are mid- and high-rise as well as non-residential. The Precinct sits as the convergence of several different land use designations (as compared to the internal areas of Woodfield) which needs a specific approach. We note that Principle #6 appears to have been "watered down" from the January 2019 version, the latter which directly addressed the conversation of height. Objective tests for measuring impact and transition were considered as part of the January 2019 scenarios, but we are unsure at this point where those scenarios stand.

And fourth, the reliance on the London Plan "as-is" is concerning. The staff report indicates a portion of the London Plan is in force and effect; however, many of the operative parts of the

London Plan that would affect the Secondary Plan process are under appeal. In particular, this includes general appeals concerning the form and intensity sections of the Downtown, Rapid Transit and Urban Corridors and Neighbourhoods Place Types; all the tables outlining height permissions; and, the majority of the City Design chapter as it concerns site and building design. Simply carrying forward the policy direction of the appealed London Plan for the Precinct is not appropriate, as it is owed a specific direction and policy framework given its prominence and varied context.

Based on the above, we would suggest that the Planning and Environment Committee “receive” these draft principles rather than “endorse” them, until such time as the full vision and policies for the Victoria Park Precinct can be considered as part of the Draft Secondary Plan.

Yours truly,

GSP Group

A handwritten signature in black ink, appearing to read 'KM', written in a cursive style.

Kevin Muir, MCIP, RPP, LEED ND
Senior Planner

cc. Steve Stapleton, Vice President, Auburn Developments Inc.
Hugh Handy, Senior Associate, GSP Group Inc.