

329 Victoria Street
London, Ontario
N6A 2C6

April 12, 2019

By Electronic Mail Only

Members of the Planning and Environment Committee:

Anna Hopkins (Chair) – ahopkins@london.ca
Maureen Cassidy – mcassidy@london.ca
Jesse Helmer – jhelmer@london.ca
Phil Squire – psquire@london.ca
Stephen Turner – sturner@london.ca

Dear Councillors:

Re: Demolition Request for 160 Oxford Street East

We own two heritage-designated properties – 163 and 165 Oxford Street East – that are adjacent to 160 Oxford Street East, and we are writing to inform you of our objection to the application to demolish the listed building located at 160 Oxford Street East.

This application has revealed shortcomings in the current demolition request process that, we believe, can only be rectified by city council denying the request for demolition.

If the demolition application was being made in conjunction with a redevelopment plan for the property, then the property owner would be required to prepare an updated Heritage Impact Assessment based on that redevelopment plan and to propose measures to mitigate the negative impacts of the redevelopment on our adjacent heritage-designated properties. According to Policy 565 of the London Plan:

“New development, redevelopment, and all civic works and projects on and adjacent to heritage designated properties and properties listed on the Register will be designed to protect the heritage attributes and character of those resources, to minimize visual and physical impact on these resources. A heritage impact assessment will be required for new development on and adjacent to heritage designated properties and properties listed on the Register to assess potential impacts, and explore alternative development approaches and mitigation measures to address any impact to the cultural heritage resource and its heritage attributes.”

However, since the demolition application is being made without an accompanying redevelopment plan, there is no requirement for any mitigation measures. The city’s only options (we are told) are either to approve the application without any conditions or to deny the application. If this demolition application is approved without any conditions attached, we are very concerned that the property at 160 Oxford Street East will sit in “limbo” for an extended period of time – much like the vacant lot on the southwest corner of Central Avenue and Waterloo Street. The only way to prevent such an outcome – given the available options – is to deny the demolition request until such time as the property owner submits a redevelopment plan and an updated Heritage Impact Assessment that

includes a proposal for appropriate mitigation measures. In our view, appropriate mitigation would include:

- If the property is to become a parking lot:
 - a landscaping plan that includes preservation of the existing mature trees to the west, south, and east of the building (most of which are on city property); installation of trees and bushes near the north and south property lines; and substantial sign-posting to frame this important gateway into the proposed Great Talbot HCD
 - no new access to or from the existing, enlarged parking lot from either Oxford Street or St. George Street
- If the property is to be redeveloped as a commercial or residential building:
 - a new building of similar massing to the demolished building, with architectural features consistent with the adjacent and neighbouring 19th century and early 20th century streetscape and not consistent with the style and features of nearby buildings constructed in the mid to late 20th century
 - preservation of the existing mature trees to the west, south, and east of the building (most of which are on city property)

For the reasons outlined above, we respectfully request that the PEC recommend to city council that the application to demolish the subject building be denied.

If the PEC decides to recommend approval of the demolition request, we respectfully request that they direct city staff to take all necessary steps to ensure that the mature trees on the city's property adjacent to 160 Oxford Street East are preserved and protected during the demolition.

It seems strange to us that the requirements on a property owner who demolishes a building adjacent to a heritage-designated property should differ based on whether or not they have a plan for their property post-demolition – and that the requirements would be less onerous on those without a plan. Regardless of the decision taken with respect to this specific demolition application, we respectfully request that the PEC and city council consider directing city staff to review this issue with the objective of identifying procedures that could be adopted to require reasonable mitigation measures – with respect to visual and other impacts on adjacent heritage-designated properties – at the demolition stage even in the absence of a redevelopment plan.

Thank you for considering our views.

Sincerely,

Bruce Jones and Kelley McKeating
329 Victoria Street
London, Ontario N6A 2C6

Copies: Cathy Saunders, City Clerk (csaunder@london.ca)
Heather Lysynski, PEC Committee Secretary (hlysynsk@london.ca)