

DREWLO

LIFESTYLE APARTMENTS

“Family Built, Owned and Managed For Over 60 Years”

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August 13, 2019

Attn: Nancy Pasato, Senior Planner

Development Services
City of London
300 Dufferin Avenue
London, ON
N6A 4L9

Re: Z-9068 (475 & 480 Edgevalley Rd): Drewlo Response to Public Comment

Dear Ms. Pasato,

Drewlo Holdings Inc. submitted a Zoning By-law Amendment (“ZBA”) application for Block 139 and Block 140 (municipally known as 475 & 480 Edgevalley Rd.) on May 8, 2019. The “Notice of Planning Application” was circulated June 3, 2019; comments were to be provided in advance of June 24, 2019.

Following review of the comments provided, Drewlo Holdings elected to host a Community Information Night for the file noted above. The meeting was hosted August 8, 2019 at Siloam United Church; 45 individuals attended, including 2 planners from the City of London (yourself and Dan Fitzgerald) as well as Councillor Mo Salih and a representative from his office.

Comments at the meeting echoed those received through the planning submission. On behalf of Drewlo Holdings Inc., we provide the following **responses**:

1552 Benjamin Drive

Just want to send an email to express my concerns about the zoning by law for apartment building on EdgeValley Road. I currently and raising my 4 young kids in a single detached home on Benjamin Drive. It is a nice quiet s neighbourhood. Many houses are already being added along Edgevalley Road at Killaly just to the east of us. This will bring many more population to the quiet area than we are already getting with the new house a going in. I am really concerned about the safety of my kids as they wait alone at the bus stop before school in the mornings, and play outside all the time, with the influx of many more people brings greater risk to their safety. Please consider the families who live on our street who moved here because it was a small, quiet, safe neighbourhood.

Thank you for hearing my concerns.

This area is a designated area for growth within the City of London, with both lands to the east and south designated under the London Plan and 1989 Official Plan for future residential uses. Through planning of the proposed development Drewlo has made reasonable effort to ensure the



impacts of development are minimized and mitigated. This is further detailed in the Planning Justification Report.

Safety means of active transportation have been provided throughout the site. Sidewalks on Kilally Road connect to sidewalks to be installed in the Edgevalley Subdivision (33M-757); these further connect to the Thames Valley Parkway and park lands in the surrounding area.

We noticed that this individual lives adjacent the temporary/emergency connection from Kilally Road to Benjamin Drive. It is important to note that this connection will be removed prior to the issuance of a Certificate of Conditional Approval and upon the opening of Edgevalley Subdivision. Benjamin Drive should not have any traffic impact from the subdivision or proposed development.

69-1403 Highbury Ave N.

Just some comments and observations re above development. This is a huge development in a rural style setting that is going to present a traffic nightmare. Traffic flow has not been well thought out and if the development is allowed to be built as proposed, there will shortly be a demand to upgrade all roads and traffic lights costing \$millions for the tax payer for the benefit of the developer. Here is the problem.

With the population density allowed, what will be the final total population of the new development? It looks like it could be in the thousands.

Traffic flowing from the development onto either Highbury or Kilalley will be a nightmare. Most of the traffic onto Kilalley will turn west to Highbury. The turning lanes at Kilalley are inadequate now and with the new development and the funeral home will be impossible. Similarly, turning onto Highbury from Edge Valley will be impossible.

In addition, Kilalley needs to be upgraded all the way from Webster to Clarke. As will Webster from Kilalley to Jensen. This development will shortly require an upgrade at Kilalley and Highbury, Edge Valley and Highbury, Kilalley and Clark.

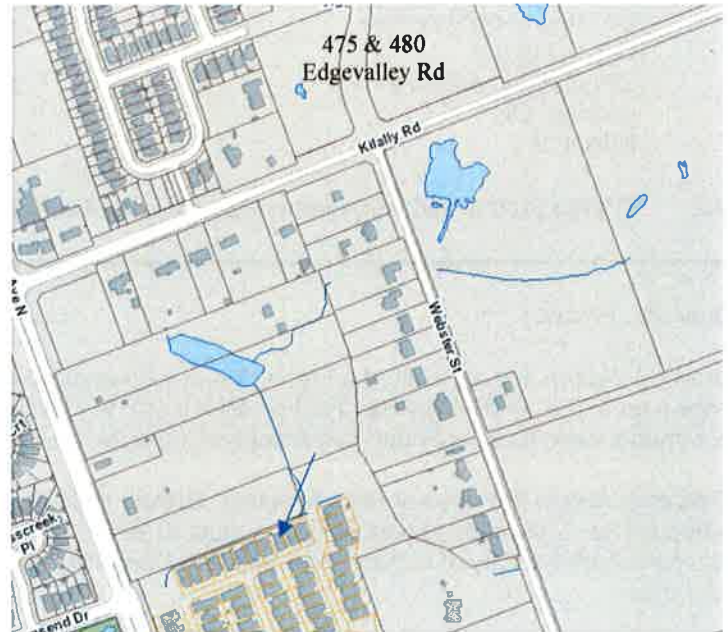
Possible these upgrades will require traffic lights at Edge Valley and Highbury and Clarke and Kilalley.

Since all this is for the benefit of Drewlo Holdings. They need to be responsible for the cost of these upgrades including the upgrade to Kilalley to Clarke and of Webster street.

Please do not allow any zoning changes or a finalization of the plans until Drewlo has upgraded all those areas for a reasonable traffic flow.

If these concerns are not dealt with before building begins, the tax payer will pay dearly.

Further, the speed on Highbury will have to be reduced from 70 to 60 kph.



As mentioned above, this area is a hub of future growth for the City; agricultural areas to the east and south are planned residential areas in both the 1989 Official Plan and London Plan.

Unfortunately Drewlo Holdings has limited control over street upgrades. These are determined by the City through the GMIS process. Development Charges contribute to upgrades where new development has resulted in an issue or need.

1478 Agathos Street

In regards to the subject zoning bylaw amendments, we request that the city deny the proposed changes requested by the developer.

After conversations with several of the existing neighbours, along Agathos St and Purser St, we feel that the construction of 5 and 6 storey buildings will not enhance the neighbourhood and will have grave consequences on the property values of our houses. We request the denial based on the following:

The London Plan (2016)

Policy 253: Site layout should be designed to minimize and mitigate impacts on adjacent properties

- The construction of 5 and 6 storey buildings will not add to the property value of our existing homes.

Policy 298: An appropriate transition of building height, scale and massing should be provided between developments of significant different intensities. This may be an important consideration at the interface of two different place types.

- The transition is far too quick, from our existing 2 storey houses to 4, 5, and 6 storey buildings. Also given that the land naturally rises, running east along Agathos St, the proposed buildings will look even taller.

City of London Official Plan (1989)

3.3.3 ii) Medium density development will not exceed an approximate net density of 75 units per hectare (30 units per acre).

- A six storey building will exceed this density

11.1.1 xiv) To the extent feasible, the design and positioning of new buildings should minimize the loss of privacy for adjacent residential properties.

- The natural land rise, combined with the height of these apartments will take away privacy of our existing houses.

In response to the Policies mentioned above;

The London Plan

Policy 253: As outlined in the *Planning Justification Report* and *Urban Design Brief* submitted with the application;

Landscaped buffers and setbacks have been considered where Block 139 and 140 abut with the adjacent, low-rise residential development to the west and future low-rise residential to the north to minimize and mitigate the impacts of the proposed development on adjacent uses. Height and shadow impacts of the proposed development are mitigated and minimized by concentrating the buildings to Kilally Road and Edgevalley Road, and focusing the taller building to the easterly edge of Block 139 where it interfaces future residential development of a proposed similar scale, height and form.

Policy 298: It is important to note that this policy is currently under appeal; however it was also addressed in the *Planning Justification Report* and *Urban Design Brief* submitted with the application;

The London Plan designates both the surrounding lands and subject lands under the Neighbourhood Place Type. The proposed buildings will not conflict with the scale, height and massing of land uses permitted in the Neighbourhoods Place Type. Lands to the north, south and east are currently vacant and will be developed in the future. Lands to the west, while also designated under the Neighbourhoods Place Type, have already been developed as single family, low-rise residential. An appropriate transition has been provided through spatial separation and proposed landscape screening. Building heights transition from the lowest (4 storeys), adjacent low-rise residential, to six (6) storeys at the east limit where the subject lands interface with future development of similar height, scale and form .

City of London Official Plan (1989)

3.3.3 ii) was addressed in the *Planning Justification Report* provided with the application:

Block 140 has a proposed density of less than 75 upha.

Block 139 has a proposed density of approximately 100 upha. In accordance with policies of Section 19.4.4, Drewlo Holdings will be providing affordable units in accordance with discussions with London HDC and the City of London.

11.1.1 xiv) was addressed in the *Planning Justification Report* provided with the application:

The siting of taller buildings will be toward the east limit of the subject lands away from existing low-rise residential to the west, to minimize loss of existing privacy.

Additionally, landscaping provides screening to minimize potential loss of privacy.

930 Blackmaple Court

It has come to my attention that Drewlo Holdings has submitted a request for a zoning bylaw change at the addresses shown in the subject line. I am a resident in the area and would like to voice my concern about any change that would increase the population density in this area. The vehicle traffic along Kilally Road is becoming increasingly heavy and will continue to do so as the planned developments proceed. A move to high density housing will further exasperate this condition. Although the intersection to this development has been modified to handle higher density traffic the arterial roads feeding this intersection are not, in my opinion, of sufficient capacity to handle the increased traffic flow. I am also concerned about the impact that this development could have on crime in the area.



The surrounding neighbourhoods are already impacted by “affordable housing” areas where there is increased criminal activities by some of the occupants. Access to lower density properties is facilitated by the multi-use paths and walkways that are included in these developments. Inserting high density affordable housing into the middle of such a development will further increase the opportunity for criminal activity. If this application proceeds I would expect that there would be some public consultation meetings required. I would like to be made aware of any such meetings when they are scheduled. I would appreciate any assistance you can provide with this.

As mentioned previously, Drewlo has little control over road improvements.

Drewlo has implemented a number of CPTED (Crime Prevention Through Environmental Design) principles with this development; ‘eyes on the street’, appropriate lighting and the placement of buildings have all been used to improve safety in the area. These have been addressed in the Urban Design Brief and Planning Justification Report submitted with the Zoning By-law Amendment application.

1501 Agathos St.

Asking about the above address, there is a zoning by-law amendment (file Z-9068) being presented to city hall. This being an amendment, I am curious about what was originally zoned for this area. When we purchased our home 3 years ago, we were told the zoning was for “for sale” condominiums. With this amendment, it appears that we will be “looking” at a parking lot in front of the 4 floor apartment building. Other than the parking lot, will the building’s proximity to Fanshawe College bring an undesirable element to our little corner of the world? My wife and I moved from the Blackfriars area after being there for 42 years. We wouldn’t like to have the same occurrence here.

The present zoning is R5-7 and R6-5. The R5-7 zone regulates medium density development in the form of cluster townhouses. It allows a maximum density of 60upha and a maximum height of 12m. The R6-5 zone allows for a range of dwelling types, including Apartment buildings. The maximum density permitted is 35upha and also permits a maximum height of 12m.

This development is not being marketed as a student residence, however students will not be prohibited from renting. The buildings consist of a range of 1 and 2 bedroom units.

27-44 Edgevalley Road

I have read the promo for the low rental apartment buildings that are for 480 Kilally. My objections are as follows:

One: The city is thinking about allowing low rentals in a community where the houses are anywhere between 400,000 to ????. Can you guarantee us that our house worth will continue to grow with low rentals this close? Do our taxes get lowered??

We all know from experience that renters in low rentals, most but not all, do not look after their places of living. Take a look at Boulee Street and Kipps Lane. There are things hanging out of the balcony, bikes and toys everywhere. How are houses going to sell here and around the area? Cheaper so that our homes are not worth as much?

I am not a snob, however I bought here due to the price and the surrounding area. Across the river there are very nice expensive homes, expensive condos at 99, 44 Edgevalley Road and on Highbury Ave. We have a gas station on Kilally that has never opened but is no an eye sore. Actually if that one ever opens, it will be 7 gas stations in a 3.3. km area.

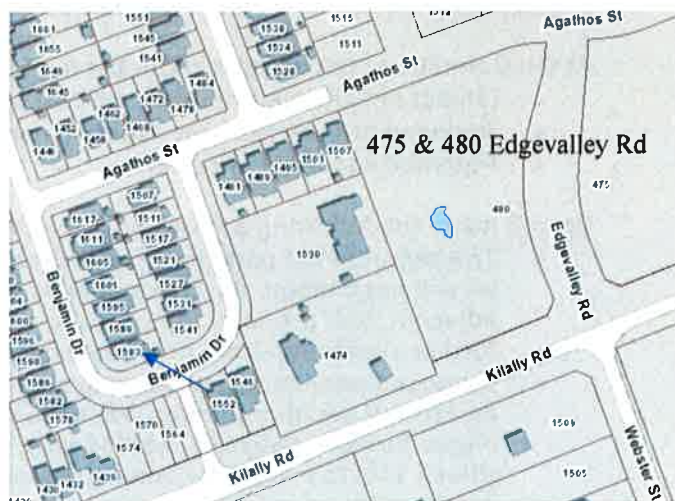


The London Plan and 1989 Official Plan speak to the desire for complete communities. Providing a range of housing options allows individuals to remain in their community, should they choose to do so.

Four (4) affordable units are proposed to be included, to satisfy the Bonusing requirement on Block 139 (475 Edgevalley Rd.) Following discussions with London HDC and City Staff, these units are proposed to be provided at 85% CMHC average market rent for a period of 15 years. These units are still operated and maintained by the Developer.

1583 Benjamin Drive

I am writing today to express my strong opposition to the proposed re-zoning at Edgevalley and Killaly streets to allow multi-story residential buildings on this site. I live on Benjamin Dr, in the adjacent subdivision, and chose to move to this neighbourhood with my family as it was a quiet and peaceful area with single family homes. The introduction of multi-story buildings, with over 200 units will drastically change our neighbourhood. As our neighbourhood is located quite close to Fanshawe College, I have grave concerns that multi-story buildings in our area will be filled with students. While post-secondary students can of course be wonderful neighbours, when there is a concentration of short term (1 year) renters in an area, the culture of the neighbourhood changes. We currently have students who rent houses in our subdivision, and are wonderful neighbours, but they are scattered throughout the area, not concentrated in one very small corner. There are many children in our neighbourhood and there are at least 6 different school buses that pick up and drop off children every single day. I have serious safety concerns for our children who wait for the bus, if such a large increase in traffic were to be introduced to this area. It is already very dangerous to have our children ride their bikes or walk along the sidewalks on Killaly Rd. as people drive far too fast along this route between Clarke Rd. and Highbury Ave., and the added congestion that over 200 apartments will bring is scary. Many of us who have recently purchased our houses (within the last 5 years) have done so after reviewing the plans for the proposed development of the lots to the North and East of our homes. The plans were for single family homes, as well as condo style town-homes to be built. This is what we expected when we purchased the house, and I am extremely disappointed and upset at the proposed change. I would strongly encourage the City of London to deny the re-zoning request of Drewlo and not allow multi-story residential buildings to be built.



As noted in previous comments:

- **Drewlo has limited control over road improvements;**

- The connection between Benjamin Dr. and Kilally Rd. is temporary and will be removed upon Conditional Approval of the adjacent subdivision (33M-757);
- The buildings are not being marketed as a student residence, however students will not be prohibited from renting; and
- Current zoning allows for medium density of a similar nature, cluster townhomes or apartment buildings at a lower density (60 upha and 35 upha, respectively) and a maximum height of 12m.

1530 Benjamin Drive

We are homeowners that occupy a single-family residential property that abuts the largest existing portion of the proposed development site, and would like to be provided with additional supporting information regarding the proposed zoning amendment. When we purchased our property on Benjamin Drive in 2012, we were aware that future development was planned for the vacant land in question, but that it was not zoned for high-density residential apartments such as those included in the proposal. Consider this letter as our formal appeal application; if an appeal needs to be filed via other means, then provided additional details so we can ensure the appeal against this file is submitted appropriately & within the time limits provided.

When site preparation operations began on the development property in 2018, we had opportunity to meet with the site engineer for MTI Engineering (Randy Lucas) who reviewed the city-approved site plan with us, which clearly indicated that the area directly adjoining our property was zoned for medium-density residential units, and he indicated that the only apartment-style multi-storey building approved by the City of London was located at the corner of Highbury Ave & Edgevalley Road, at the north-west end of the new development. He also indicated that the zoning in place would permit the developer to commit to condominium-style townhomes, or something similar, which would not exceed 2 stories in height.

We have significant concerns with the zoning amendment proposal that we intend on bringing forth since our property & personal security is likely the most impacted by these proposed changes. Please provide details for the public meeting where we can voice our concerns & objections to this proposal. Our councillor (Mo Salih) is cc'd on this message, and we look forward to the opportunity to meet with him personally to review the many concerns we have with the zoning amendment proposal.

Drewlo staff met with the residents of 1530 Benjamin Drive to discuss their concerns, and potential solutions/ compromises to the highlighted issues.

In response to the shift from medium density townhomes to a low-rise apartment development, we advised that this change was driven by changes in the market. Housing costs have increased significantly across Ontario, particularly southwestern Ontario. Housing in the form of low-rise apartments will introduce a more affordable option to the neighbourhood, in addition to the planned towns, high rise and single family in the remainder of the subdivision. We advised the homeowners, while this density is higher than what is permitted under the current zoning it is still considered 'medium density'; in accordance with the permissions of the London Plan and 1989 Official Plan.

At the Community Information Night the homeowners expressed a number of concerns including:

- Impact of vehicles from the adjacent parking;
- Reduced privacy from the buildings on Block 140; and
- Potential security concerns.

Drewlo made the following adjustments to address majority of their concerns:

- The layout of the parking lot is proposed to be adjusted. While the actual location of the parking lot will not change, the parking stalls will relocate so that vehicles are not parking directly adjacent their property (new layout: approx. 5m buffer + approx. 6.7m drive aisle). This provides further separation from potential adverse impacts.
- Proposed additional landscaping adjacent existing homeowners. Initially the proposal included one row of deciduous trees. We have proposed to add an additional layer of coniferous species to create further screening. Additionally, more landscaping will be added in front of Building A (Block 140) to eventually screen balconies from looking into the adjacent properties.
- A 1.8m (6ft) wooden privacy fence will be installed along the property boundary (slightly within Drewlo property limits and will be the responsibility of Drewlo to maintain).

- **We discussed the “Crime Prevention through Environmental Design” (“CPTED”) measures that will be implemented. These should improve existing security concerns. The CPTED measures include:**
 - **Lighting;**
 - **‘Eyes of the street’;**
 - **Placement of the building; and**
 - **Identified points of entry.**

Following our meeting the residents were satisfied with the proposed changes. Drewlo intends to continue conversations with the homeowner after these changes have been incorporated into the Site Plan and will consider their feedback in future site plan submissions.

1507 Agathos

Email Submission:

I would like to lodge a formal complaint and object to the proposed zoning changes for above referenced lands.

My wife and I own 1507 Agathos Street and do not want to have apartment complexes and large parking lot beside my residence. I have emailed you before to add me to the distribution list and keep me informed regarding the development of this new subdivision but have never received any emails regarding this. I am extremely upset that no one reached out to the neighbouring properties for input on the proposed change. I found out about this from a sign that was posted but wish that I was contacted directly. Drewlo Holdings seems to be able to set their own rules and not follow the current zoning that is in place. The planned subdivision has already nearly lapsed many times and I don't feel the zoning should be changed just because a large developer wants to increase the density and their profit margins.

Reasons for not wanting rezoning include:

- *Do not want high density development in my back yard (fish bow effect)*
- *Traffic is already bad enough and will be much worse once the subdivision and funeral home are completed.*
- *Do not want to increase the impermeable surface coverage (worried about surface runoff water).*
- *Do not want a large parking lot with no trees.*
- *Drewlo has already clear cut the forest that used to grow beside my house and now they want to pave the entire site which has environmental and hydrological impacts.*

I look forward to hearing more about this proposal and hope that the city can work with the existing residence to avoid this unnecessary proposed zoning change.

The resident of 1507 Agathos was also part of the meeting with the residents of 1530 Benjamin Drive. The changes expressed above were implemented to address his concerns as well. Preliminary engineering plans were shared to address grading and stormwater management concerns.

Following our meeting with the resident he was satisfied with the concessions made. We intend to continue conversations with the homeowner.

Call to City of London:

- *Against application*
- *Concern over traffic*
- *Concerns over landscape OS/lack of greenspace – all parking*
- *Concern over high density*
- *Will have petition*

As mentioned above, Drewlo staff met with the resident at the Community Night and subsequently to discuss his concerns. Based on conversation with the resident at 1507 Agathos St. and 1530 Benjamin Dr. Site Plan alterations were proposed. This addressed parking and landscape concerns, in addition to others. A sketch of the proposed changes have been attached. Drewlo continues to work through the Site Plan process with the City of London.

438 Briarhill Avenue

I am totally against allowing a zoning change for the area of Edgevalley & Kilally roads. We do not need apartment buildings in this lovely quiet single family homes neighbourhood. Please don't change the zoning for this area.

As previously mentioned (and outlined in the Planning Justification Report), apartments are a desired product to address affordability concerns currently plaguing southwestern Ontario. Different forms of housing helps to create a complete community with varying demographics, allowing individuals to remain in their neighbourhood if they choose to do so.



1546 Benjamin Drive

Call to City of London

- Against 5 apartment buildings
- Was supposed to be low rise condos 1-2 storeys
- Been here 16 years
- Issues with property on Kilally – junk, fixes cars onsite
- Nothing has been done
- Apartments don't go with the area

1505 & 1509 Webster Street

Front Counter visit (June 18, 2019)

- *Background: application for Edgevalley subdivision – Drewlo was going to extend services to 3 lots on Webster – this never happened*
- *Reconstruction of Kilally – 9 foot retaining wall along 1505 & 1509 Webster due to grade changes; 1499 Webster was supposed to have 2 foot wall, now 6 foot wall – and no extension of services*
- *Traffic light & sidewalk were supposed to be installed @ Webster & Kilally – not done – no sidewalks or services on Webster*
- *Traffic considerations increased by this development – stop sign at Edgevalley/ Webster & Kilally – can't see because of retaining wall (mentioned above) – area roads will not handle this increase*
- *Need to be intervening land use/transition from singles to apartments – needs to be a buffer from higher intensity to singles*
- *Object to zone change overall*

Follow up was provided by Kevin Edwards (City of London) regarding Road projects and estimated dates.

The reconstruction of Kilally Rd was a City of London project, unfortunately Drewlo had limited control. This was discussed with the resident at the Community Night, and understood.

Letter Submitted to Development Services:

Further to our conversation last week I would like to reiterate and add to our concerns.

We are holders of 2 large residential lots at 1509 and 1505 Webster Street and are negatively affected by this proposal.

The original draft plan by Drewlo Holdings included single family and townhouse developments along Kilally Road, serving as a buffer between single family and high density development.

The proposed zero setbacks and apartment buildings are a drastic change and not welcome.

The huge proposed parking lots to service high rise dwellings are more conducive for a shopping mall.

Would underground parking not be a better option?

The anticipated population would nearly double and traffic would negatively affect Kilally Road to the east as well as Webster Street to the south, both being the equivalent to paved county roads.

Webster Street has a deep culvert closer to Jensen Road that has a metal guard to the west and an old tree to the east, none of the locals pass each other at that location but take turns.

The Homes on the west side of Webster Street between Jensen and Kilally Roads were built on lots 100' wide more or less with setbacks of 100'. These homes are on septic tanks and wells. There are no sidewalks, curbs or gutters with the exception of curbs and gutters at 1499 to 1505 Webster Street at the reconstructed Street section.

Homes constructed on the south side of Kilally between Highbury Ave and Webster Street were built to similar specifications but have curbs and gutters – but do not have sidewalks; on the north side of Kilally Road there are sidewalks from Highbury Ave to Edgevalley Roads as well as curbs and gutters.

To align Webster street and Edgevalley Roads Webster Street's grade was lowered by the City and a retaining wall was proposed of 2' in height at 1499 Webster gradually increasing to 9' at 1505 Webster Street.

A three foot error occurred and we now have a retaining wall that starts at 6' and graduates to 10' along the three properties.

The newly constructed wall makes it impossible to see oncoming traffic from the left at the stop sign on Webster Street, you have to advance two car lengths into the intersection to be able to do so. When will the proposed traffic lights be installed?

The expected services on the three properties were not provided. Also street lights, traffic lights at the intersection, sidewalks, hydro poles moved to the east side of Webster only showed on the City plans displayed at Montcalm High school to the general public.

Please note that the changes to the road on Webster Street starts in May of last year, the work is not yet completed. We had been told that this work would be completed in 4 months.

Trusting the afore going information is helpful.

The owner of 1505 & 1509 Webster attended the community night. It was discussed that concerns related to Kilally Road reconstruction or potential upgrades of Webster Street should be directed to the City of London.

The initial proposal depicted 'zero setbacks', as is generally desired, to create a positive pedestrian experience. Due to grades, a 'zero setback' along Kilally Rd would have resulted in the construction of retaining walls. Consultation with the City of London indicated that retaining walls were not desired and the buildings were setback approximately 4m from the property line to eliminate the need for retaining walls. This was explained to the resident at the Community Night; she was satisfied with the new setback.

Attendance sheets from the Community Information Night have been attached to this letter. It is our understanding that public comments as well as agency comments will be included in the Staff Report.

We hope that this letter will assist in discussions at the Planning & Environment Committee meeting on September 9th, as well as at Council. If there are any concerns or questions, do not hesitate to contact our office.

Sincerely,
DREWLO HOLDINGS INC.


Carrie O'Brien
Land Planner

cc. George Bikas, Drewlo Holdings Inc.
Paul Hinde, Ironstone Building Company
Lou Pompilli, City of London
Mohamed (Mo) Salih, Ward 3 Councillor

encl. Community Night attendance sheets
Sketch – proposed site plan changes (per discussions with 1507 Agathos and 1530 Benjamin)