



January 30<sup>th</sup>, 2020.

City of London  
Planning & Environment Committee  
300 Dufferin Ave.,  
P.O. Box 5035 London ON N6A 4L9

**Attn: Councillor M. Cassidy, Chair of Planning and Environment Committee**

**RE: Victoria Park Secondary Plan**

This process represents the most significant gap in planning opinion between myself and staff that I have had in my career. Although we appreciate infill projects provide additional elements to consider, most do not represent such a large deviation in a recommendation to Council. Given this significant deviation in what represents 'Good Land Use Planning', we offer our examination of the proposed Victoria Park Secondary Plan as well as our analysis and commentary regarding the rationale that Council should consider as an appropriate alternative for the East Policy area of the Plan.

#### Evolution of Wellington

Like most Cities, the expansion and development of their downtown places pressures beyond the boundaries and extend its influences into the greater core areas. These pressures exist on all boundaries and have been experienced along Wellington St on the periphery of Woodfield neighbourhood. As noted previously, Woodfield is not a homogenous neighbourhood within a unified built form, it has a potpourri of housing types, forms, heights all of which can be experienced side by side.

The Wellington St corridor differentiates itself from many areas of Woodfield and in fact developed separately to much of Woodfield. The corridor developed from the transformation of the Military base and dedication of Victoria Park. This remnant neighbourhood was created east of Wellington St and north of Dufferin Ave. This distinct evolution continued in the 1960's and 1970's when the original residential fabric was replaced with Civic, entertainment, residential highrise and office uses which transformed the original fabric of the area. This redevelopment included 560-562 Wellington St. How did this negatively impact Woodfield? It didn't.



## **Assessment of Character**

The proposed Secondary Plan has not fulfilled the Terms of Reference for the study. There has not been a proper assessment and characterization that would be utilized to inform the evolution of the area. We can advise that the location of the lands east of the Wellington Corridor have already seen redevelopment and do not maintain the original single-family residential character. The area cannot be classified as a 'stable' neighbourhood, in fact it is classified as a 'Transitional' neighbourhood. This classification is identified by the conversion of single-family residents to multi-family units and office conversions. The once private rear yard amenities (rear yards) have been replaced with parking to accommodate the increased density and office uses. This is a normal evolution that signals a need to address land use change. This happens in locations close to downtown because of the 'locational attributes' associated with the area. Employment, open spaces (Park), restaurants, retail and entertainment all support a locational desire and increase the areas prominence. This prominence, if supported by a change in land use will grow the City. Matching land use hierarchy and locational prominence should be the goals of this report. The question then becomes, how much? Or How to determine appropriate height?

## **How to Determine Appropriate Height**

We all agree that the PPS (Provincial Policy Statement) directs cities to intensify. The London Plan directs Central London to be an area of intensification. The periphery of Downtown, areas of employment (City Hall, London Life Office towers), open space (Victoria Park), restaurants, retail and entertainment (Richmond Row) and transit all direct intensification to the area. To determine where and how much requires additional work.

Staff has identified their preference in determining the distribution of intensification opportunities as "higher along Dufferin Ave and lower as you move north". On the surface this seems logical, understanding Dufferin Ave as a built form boundary of the downtown, however, staff has also included height along Richmond St – 30 and 25 storeys immediately north of the Basilica and 16 storeys on top of the Baptist Church and Williams Café.

Staff also suggest that despite being the furthest distance from Dufferin Ave, the North Policy Area enjoys 4 to 16 storey height determination, north of Central Ave, 16 storeys is appropriate. Why is this? Staff's answer: Richmond is a planned Transit Corridor.



The East Area also sees an increase in Height for City Hall and the London Life site (to varying degrees), however, staff indicate a sensitivity to high-rise buildings adjacent to low rise built form only in this Policy Area. The rationale is not provided and does not correspond to our characterization nor does it speak to completing the streetscape along Wellington Rd.

It is interesting to note that the distance to the Clarence St Transit stop from the North Policy Area as well as, 560 Wellington St are both approximately 200m. If this was the rationale and they are similar distances, there should be an adjustment to the permission. They both have similar 'low rise buildings adjacent. This needs to be recognized by increasing the East Policy Area (B) to 16 storeys.

Staff's allocation and distribution of height was done without any consistent analysis, characterization or weighing of impacts. Given the North parcel has similar attributes, the proposed height should be similar. Given the proposed streetscape of Wellington St, 560-562 should be increased. The development context has been created.

### **EAST Policy Area – Special Tools Not Required**

As noted, the immediate area is classified as a transitional neighbourhood. The Secondary Plan has proposed the use of the Planning Tool – Angular Plane (45 degrees) to be applied to developments adjacent to 'low rise' buildings but only in the East Policy Area. There is no justification for use of this tool. There is no sensitivity given the transitional context nor is there incompatible uses. This tool should not be applied to a 'transitional' area, in fact, the application of angular planes as a planning tool should not be used where intensification is the goal and where the remainder of the street ranges to 30 storeys. Perhaps this is something that should apply to a Transit or Urban Corridor which abuts 'stable' neighbourhoods such as the case along Oxford St, Wharncliffe Rd, Adelaide St, etc. It is interesting to note that this 'sensitivity' tool would be used in an area of transition and which has previously undergone redevelopment to other uses. Its' applicability is questionable and should be removed.

It also appears that staff's concerns of compatibility relate to Built form. Built form doesn't equate to compatibility. The uses of the built form and impacts of a structure may affect compatibility but this needs to be analyzed. There are numerous examples of compatible High-rise and low-rise buildings throughout Woodfield and throughout the City, in fact, an existing 8 storey apartment is within East Policy Area block and has not impacted the enjoyment of adjacent properties. The premise of uniform built form is not "good land use planning."



## Action Required

We can appreciate that it is difficult to embrace change and believe there can be a positive evolution. The history and experience of Auburn Developments Inc. in London and in Kitchener and Waterloo illustrate our commitment to infill success.

Previously, we successfully integrated Highrise across from Eldon House. We have successfully transformed Uptown Waterloo with the Barrel Yards project which included 1,200 RES units, office and a hotel. We look forward to adding to our success with the completion of Arrow Lofts, Phase 2 and with the transformation of the Schneider's plant (2,000 RES units) to an integrated community, however, we also wish to contribute to the success of Victoria Park area.

We would ask Planning Environment Committee and Council to revise the Secondary Plan, enable our site to be redesignated for increased height up to 16 storeys as noted and eliminate the use of angular planning tool applicable to the East Policy Area.

We truly believe that the character of the Wellington Corridor is enhanced with our proposal and believe we can begin the positive evolution that we can call inspirational.

Sincerely;  
Auburn Developments Inc., acting as agent for  
560 Wellington Holdings Inc.

A handwritten signature in black ink, appearing to read "Stephen Stapleton", with a long horizontal flourish extending to the right.

Per; Stephen Stapleton  
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## Attachments:

- Wellington Corridor Rendering – as per existing zoning & our proposal – 15 storeys
- View from Clarence St looking East from the Bandshell
- 'Rear Yard' Parking Spaces
- Transit Stop Map
- Victoria Park – 1881 Map