

March 8, 2020

Members of the Planning & Environment Committee:

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Dear Councillors:

**Re: 84 - 86 St. George Street and 175 -197 Ann Street Official Plan and Zoning Amendments
File OZ-9127**

In recent years, city staff have spent thousands of hours considering how London should grow over the coming decades. Thousands of Londoners provided their input to that process. The result of that thoughtful analysis was the London Plan. My view is that new buildings should follow the zoning rules set out in the London Plan. Those zoning rules should not be changed willy-nilly to accommodate the wishes of property owners.

According to the London Plan, the maximum height for a building on the subject site is 2.5 storeys. According to current zoning, the maximum height is 12 meters. The requested zoning amendment would permit a building 7.75 times higher than current zoning allows, and 26 storeys more than the London Plan would allow.

Ann Street east of St. George Street is a short, dead-end street. It is poorly suited to the level of intensification proposed:

- The property in question is within the expected study area for the North Talbot Heritage Conservation District. The Kent Brewery complex is an important component of this heritage neighbourhood. It should be preserved, at least until the HCD study has been completed.
- A 28-storey building on this site, very close to the three neighbouring mid-rise and high-rise apartment buildings, would result in a loss of privacy, sunlight, and view. It would make many units of the existing buildings less desirable as living spaces. This is unfair to the residents of those units, and to the owners of those units/buildings.
- The only access from Ann Street to Richmond Street is by way of a narrow, winding pedestrian lane that crosses private property. This walkway has many blind spots and is poorly lit at night. Thus, there is no practical direct access from Ann Street to Richmond Street.

- Many of the 800+ residents of the proposed building will obtain their meals by delivery service, use ride shares rather than public transit, and shop on-line rather than in person. With proposed lot coverage at 97%, there appears to be no provision for off-street parking for all those delivery vehicles. The coming and going, and on-street parking, of those delivery vehicles has the potential to create chaos on Ann Street and St. George Street – a busy route for dump trucks and cement mixers.
- The proposed development appears to be inconsistent with the provincial policy statement (PPS) which requires that significant built heritage resources be conserved, and encourages livable, diverse communities. The proposed development fails on both counts.

With respect to intensification projects in general:

- Given the shortage of affordable housing units in London, should the city consider making approval of development proposals conditional on a minimum number or percentage of affordable housing units? The staff report does not address this possibility.
- The staff report appears to suggest that tenant parking would be above ground. Generally speaking, it would be preferable to require the vast majority of parking spots in new apartment buildings to be underground.

I respectfully ask that the PEC to consider the above comments as it decides what guidance to give to staff in respect of this Official Plan and zoning by-law amendment request.

Yours truly,

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