

Architectural Conservancy Ontario – London Region Branch
Grosvenor Lodge
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September 17, 2020

Members of Planning & Environment Committee:

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Re: File SPA19-046 – 556 Wellington Street

Dear Councillors:

On behalf of the London Region branch of Architectural Conservancy Ontario (ACO London), I am writing to express opposition to the proposed site plan control and Heritage Alteration Permit applications for 556 Wellington Street.

Our concerns can be summarized as follows:

- It seems premature to consider a development proposal of this magnitude, adjacent to Victoria Park and within the boundaries of the West Woodfield Heritage Conservation District, while the public consultation process regarding the draft Victoria Park Secondary Plan is still ongoing. Approval of this site plan application would give the impression that the public consultation process is not meaningful and that public input has no impact on the development decisions made by the city.
- Approval of the proposed development and of the Heritage Alteration Permit application would not seem to be in accordance with Policy 4.3 of the West Woodfield HCD Plan which states (our emphasis) that “new buildings shall respect and **be compatible with** the heritage character of the West Woodfield area, through attention to **height, built form, setback, massing, material and other architectural elements.**”
- At 18 storeys, one of the proposed buildings is approximately twice as high as the West Woodfield HCD’s recommended maximum height for the City Hall Precinct (which includes 556 Wellington Street). The recommended maximums are 8 to 10 storeys for buildings facing Wellington Street and Dufferin Avenue, and 3 storeys for buildings adjacent to houses on Wolfe Street and Princess Avenue. The proposed development is adjacent to five houses on Wolfe Street and one house on Princess Avenue. As a result, our view is that the 3-storey maximum should apply.

- The proposed development is inconsistent with the Ontario Municipal Board's 2015 decision in *CHC MPAR Church Holdings v. City of Toronto*. In that case, the proponent wished to construct a 32-storey building adjacent to a designated property. The OMB determined that respectful separation distance was critical to conserving the heritage attributes of the neighbouring designated and listed properties. The 556 Wellington Street site is immediately adjacent to properties that are designated under Part V of the Ontario Heritage Act (as part of the West Woodfield HCD).
- The proposed development would set a precedent for inappropriate construction in other City of London Heritage Conservation Districts. There is little point to establishing Heritage Conservation Districts if their architectural heritage integrity is not respected by the city. There is no point to having rules if exceptions are always granted to anyone who requests one.
- The suggested design and massing are out of character with West Woodfield, a neighbourhood of Victorian homes, and with the other homes bounding Victoria Park.
- Five storeys of above-ground parking, and only two below-ground levels of parking, are proposed. Since the proposed parking structure would apparently be only 2 meters away from one of the neighbouring houses (on Princess Avenue), there is no room for the owner of 556 Wellington Street to plant trees or do anything else to shield the parking structure from the view of nearby residents.
- Nearby properties on Wolfe Street, including the five that border on 556 Wellington Street, and nearby properties on Princess Avenue would be adversely impacted by the proposed development. There would be a significant loss of privacy and a loss of natural sunlight. The shadow studies show that the shadow of the buildings would extend all the way to Waterloo Street during some time periods, and that several houses on Wolfe Street and Princess Avenue would be in shadow almost all of the afternoon during March and September.
- Victoria Park would be adversely impacted by the proposed development. There would be a significant loss of natural sunlight, to the detriment of vegetation and public enjoyment of the park.

For 556 Wellington Street, our opinion is that a residential development (with underground parking) that is in keeping – in height, massing, construction material, and design – with the character of the West Woodfield HCD (and that is in accordance with the relevant HCD Plan policies) would be more appropriate than what has been proposed.

Sincerely,

Kelley McKeating
President, Architectural Conservancy Ontario – London Region

Copy: Cathy Saunders, City Clerk (csaunder@london.ca)
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