# **Report to Planning and Environment Committee**

To: Chair and Members

**Planning & Environment Committee** 

From: George Kotsifas, P. Eng

Managing Director, Development & Compliance Services &

**Chief Building Official** 

Subject: GWL Realty Advisors

**556 Wellington Street** 

Public Participation Meeting on: September 21, 2020

### Recommendation

That, on the recommendation of the Director, Development Services, the following actions **BE TAKEN** with respect to the application of GWL Realty Advisors relating to the property located at 556 Wellington Street:

- (a) The Planning & Environment Committee **REPORT TO** the Approval Authority the issues, if any, raised at the public meeting with respect to the application for Site Plan Approval to permit the construction of two buildings containing a total of 405 units; and
- (b) Council **ADVISE** the Approval Authority of any issues they may have with respect to the Site Plan Application, and whether Council supports the Site Plan Application.

# **Executive Summary**

#### **Summary of Request**

The development for consideration consists of two apartment buildings on the east side of Wellington Street at Wolfe Street, with a total of 405 residential units and a total of 550 parking spaces. The units and parking are provided in two buildings. The first building fronting onto Wellington is 18 storeys tall with 17-storeys of residential above one-storey of retail, and 264 underground parking spaces. The second building in the rear of the site is 12 storeys tall with seven-storeys of residential above a five-storey parking structure, containing 286 parking spaces. The site is to be developed with municipal services from Wellington Street and vehicular access from Wolfe Street. The development proposal is subject to a public site plan meeting in accordance with the policies of the West Woodfield Heritage Conservation District Plan.

### Purpose and the Effect of Recommended Action

The purpose and effect of the recommendation is to report to the Approval Authority any issues or concerns raised at the public meeting with respect to the application for the Site Plan Approval.

### It being noted

- 1. With the exception of minor drawing amendments that will be required prior to Site Plan Approval, the proposed Site Plan could comply with the Downtown Area (DA1(1) Zone that is in full force and effect that permits a high rise development on the property.
- 2. On June 13, 2019 conditional Site Plan Control Approval was granted, subject to the applicant satisfying their conditions of approval. Prior to Site Plan approval, minor revisions are required to the proposed site plan, landscape plan and elevations that will result in development that is in compliance with the Site Plan Control By-law, and Zoning By-law, noted above, and the successful receipt of a Heritage Alteration Permit is required.

# 1.0 Site at a Glance

# 1.1 Property Description

The development for consideration consists of 2 apartment buildings on the east side of Wellington Street at Wolfe, for a total of 405 residential units and a total of 550 parking spaces. The proposed development is comprised of two buildings with a total density of 660 units per hectare. The first building fronting onto Wellington is 18 storeys tall with 17-storeys of residential above 1-storey of retail. The second building in the rear of the site without street frontage is 12 storeys tall with 7-storeys of residential above a 5-storey parking structure. The site is to be developed with municipal services from Wellington Street and vehicular access from Wolfe Street. The development proposal is subject to a public site plan meeting in accordance with the policies of the West Woodfield Heritage Conservation District Plan.

# 1.2 Current Planning Information (See Appendix 'D')

- 1989 Official Plan Designation Office Area
- The London Plan Place Type Neighbourhoods Place Type
- Existing Zoning Downtown Area (DA1(1)) with a special provision to permit a Convention Centre.

#### 1.3 Site Characteristics

- Current Land Use Commercial parking lot with a total of 204 parking spaces
- Frontage 86.0 metres
- Depth 104.3 metres
- Area 0.61 ha (6070 m²)
- Shape L-shaped.

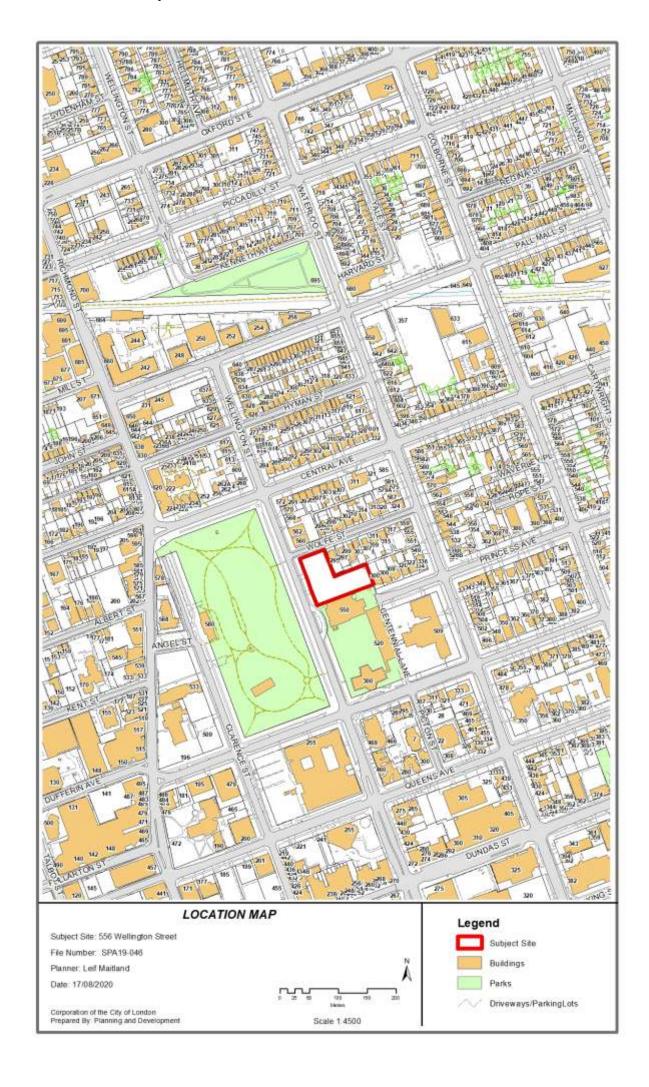
# 1.4 Surrounding Land Uses

- North Five-storey Office and two and a half storey detached dwellings
- East Three-storey Office/Residential building and three-storey detached dwellings
- South Centennial Hall institutional venue
- West Victoria park regional park bounded by Dufferin Avenue, Clarence Street,
   Central Avenue and Wellington Street

# 1.5 Intensification

- 405 units within the Built-area Boundary
- 405 units within the Primary Transit Area

# 1.6 Location Map



# 2.0 Description of Proposal

#### 2.1 Development Proposal

The development for consideration has a total of 405 apartment units in two apartment buildings, and a total of 1370m² commercial floor area in one of the buildings. One building is to contain 17 storeys of residential above one storey of commercial fronting on Wellington, and two levels of underground parking. The second building proposed is to contain seven storeys of residential above five storeys of parking in the rear of the property without direct frontage.

The buildings are proposed in a tiered formation with step-backs to distinguish the tiers and a number of material changes. The front building has a two-storey podium followed by tiers of 3, 5, 3, 2, 2, 1 and 1 storey in height. The rear building has five storeys of parking, the first four in the same architectural wrap, followed by residential tiers of 2, 2, 2 and 1 storey in height.

The front building is primarily clad in pre-cast concrete in a number of finishes up to the fifth storey, clad in EIFS panels from storey 6 to 13 and a mixture of clear and spandrel glazing above. The rear building is clad primarily in pre-cast concrete up to the 5 storey a mix of a spandrel and clear glazing on the top three-storeys and a combination of primarily spandrel glazing and primarily pre-cast section in between. Red brick is used in the development but its use is limited to the podium of the front building.

Automobile parking is provided in the form of 550 parking spaces both in two below grade levels and in five-storeys of structured parking in the rear building. This is in excess of 16 parking spaces required by the by-law to service the commercial uses.

The buildings are situated near the property limits on the site. The front building is located 0.7m from Wellington Street and 0.35m from Wolfe Street. The rear building is site 0.6m from the easterly (rear), 0.5m from the northerly property line and 0.2m from the southerly property line (both interior side).

Detailed plans of the development are contained in Appendix 'A' of this report.

### 3.0 Relevant Background

### 3.1 Planning History

The site was zoned to permit a convention centre in 1993 in an effort by Municipal Council at the time to create a number of location options for the Convention Centre being sought. The zoning that was approved at this time, Downtown Area DA1(1), is in effect for the site.

The West Woodfield Heritage Conservation District Plan and Guideline document (Plan) was approved in 2008. The heritage alteration permit process is the main tool by which the City of London implements the goals and objectives of the Plan. It provides the City with the ability to regulate and guide development within West Woodfield to maintain the character of the District and the intent of this Plan. The City Hall Precinct, which includes 556 Wellington Street (the subject lands), acknowledges "enormous development potential" in the future given the Downtown Area DA1(1) zoning permissions. The policies and guidelines of the Plan serves to guide potential development that is respectful of the heritage character of the district, yet, "is not too restrictive to the potential of the site".

The City of London is currently undertaking a secondary plan review for the Victoria Park Precinct, in which the subject lands are included. Following a public meeting at the Planning and Environment Committee on February 3, 2020, the draft of the secondary plan was referred to City staff for further public review and engagement. The draft versions of the proposed secondary plan contemplates high intensity forms of

development on the subject lands. At present the secondary plan has no policy status.

On May 16, 2019, the subject application of this report, being a Site Plan Control Application (file no. SPA19-046) for a 408-unit apartment development, was received by the City of London. Conditional approval was issued on June 13, 2019. Only the policy, guidelines and zoning in effect at the time of the submission of an application can be considered by the Approval Authority.

# 3.3 Community Engagement (see more detail in Appendix B)

### Notice of Application

On July 3, 2019 Notice of Application was posted in the Londoner, and circulated to landowners within 120m of the subject lands

### Notice of Public Meeting

On September 3, 2020 Notice of Public Meeting was posted in the Londoner, and circulated by regular mail to 20 landowners within 120m of the subject lands, and those who had identified themselves as interested parties following notice of application.

#### Comments

Eleven responses were received; all but two were in opposition to the development proceeding. Of note, two respondents provided archaeological information that would support further investigations proceeding prior to an approval.

All comments received are available in Appendix "B"

### 3.4 Policy Context

Provincial Policy Statement, 2014 (PPS)

The PPS encourages intensification and redevelopment where it can be accommodated, which takes into account the existing building stock and the suitability of existing or planned infrastructure (1.1.3 PPS). The proposal will redevelop an underutilized site that has full access to municipal services at the edge of the downtown. Land use within settlement areas shall be based on densities that efficiently use land and resources, and are appropriate for and efficiently use the infrastructure and public service facilities that are planned or available and support active transportation ((1.1.3.2.a) & 1.4.3.d)). The proposal efficiently utilizes public services adjacent to an established neighbourhood. Further, the proposed redevelopment will assist in achieving an established intensification target for built up areas, consistent with the goals of Municipal Council and in accordance with the PPS (1.1.3.5).

The proposed development is consistent with the policies of the PPS as it will facilitate the redevelopment of an underutilized site within a settlement area. The proposed redevelopment introduces an efficient form of development along an existing Civic Boulevard (Arterial). No new roads or infrastructure are required to service the site, therefore the development makes efficient use of existing services. As such, the proposal is consistent with the intensification policies of the PPS.

#### The London Plan

The London Plan is the new Official Plan for the City of London (Council adopted, approved by the Ministry with modifications, and the majority of which is in force and effect). The London Plan policies under appeal to the Local Planning Appeals Tribunal (Appeal PL170100) and not in force and effect are indicated with an asterisk throughout this report. The London Plan policies under appeal are included in this report for informative purposes indicating the intent of City Council, but are not determinative for

the purposes of this planning application.

The subject site is located within the Neighbourhoods Place Type on a Civic Boulevard as identified by *The London Plan*.

The Our Strategy section of *The London Plan* establishes key directions to guide planning and development in our neighbourhoods. The proposal seeks to achieve key directions by developing housing options within close proximity to employment lands. Additionally, the proposal seeks to build a mixed-use compact city by providing a development that achieves a compact, contiguous pattern of growth by developing inward and upward; and intensifying development within the Urban Growth Boundary to protect valuable agricultural lands.

The Neighbourhoods Place Type and City Design policies of the plan seeks to create a strong neighbourhood character, sense of place and identity. The proposal does not respond to the planned character for the place type and a number of the City Design policies which direct the appropriate approach to high-rise development.

Taking the applicable policies into consideration (as expanded on in section 4.0), the development would not be considered to be in conformity with *The London Plan*.

#### 1989 Official Plan

The subject site is designated Office Area in the 1989 Official Plan, which permits offices within purpose-designed office buildings, and buildings converted for office use and contemplates secondary uses which may be permitted as accessory to offices including eat-in restaurants; financial institutions; personal services; day care centres; pharmacies; laboratories; and clinics. Regarding form the policies direct that office buildings in Office Area designations shall be low to medium rise in height, and of a scale that will minimize the impact on, and can be integrated with, surrounding uses. Office buildings shall be permitted up to a medium scale in the Office Area designation.

The proposal is not in conformity with the Official Plan (1989); however, the Downtown DA1(1) Zoning that is in effect prevails over the Official Plan.

#### Z.-1 Zoning By-law

The subject lands are zoned Downtown Area DA1(1). The DA1(1) Zone permits dwelling units above the second storey and a wide variety of commercial uses in the ground floor. A maximum height of 90.0 metres (approximately 30storeys), is permitted along with 100 percent lot coverage and 0.0m setbacks, whereas the proposed development is for two buildings with heights of 18 and 12 storeys, respectively, and a lot coverage of 80 percent. For the residential portion of the building there is a setback requirement of 1.2 metres (3.9 feet) per 3.metres (9.8 feet) of main building height or a fraction thereof above 15 metres (49.2 feet). This setback as shown on the drawings is not met by the proposal at this time, however could be, given minor drawing amendments (see 4.3 below).

The building is located within parking standard area 1 and the Downtown Area, with no parking requirements for residential uses and 1/90 square metre for residential uses for a total of 16 required spaces. The 550 provide parking spaces exceeds the parking requirements for the site; however, as the parking requirement is a minimum the proposed number of parking spaces does not contravene the Zoning By-law.

# 4.0 Key Issues and Considerations

### 4.1 Use

The proposed use of a mixed-use high rise apartment building of 18 storeys and a second 12-storey apartment building with five storeys of structure parking are permitted under the applicable DA1(1) Zone. The dwelling units at grade are "restricted to the rear portion of the ground floor or on the second floor or above" as provided in the proposal. The DA1(1) Zone that is in full force and effect is the prevailing regulatory tool to assess the use permitted on this site contrary to the policies of *The London Plan* and 1989 Official Plan.

The London Plan policies applicable to the site would limit development to four storeys (or up to six storeys with bonusing) in a low-rise apartment building form, given the location on a Civic Boulevard within the Neighbourhoods Place Type. Commercial uses are not contemplated at this location by the policies of *The London Plan*.

The uses contemplated under the 1989 Official Plan would be limited to office uses of a medium scale, and as such the proposal is not in keeping with the direction provided by that plan.

#### 4.2 Intensity

The proposal for 405 residential units and 550 parking spaces would not be achievable in a four storey (six-storey with bonusing) apartment building as contemplated by *The London Plan* at this location.

The site is also subject to policy of 1034\* of *The London Plan* regarding the Woodfield Neighbourhood. That policy notes that: "it is a policy of this Plan to maintain the Woodfield Neighbourhood as a low-rise residential area."

The Downtown Area zone does not provide a maximum residential intensity – as measured through density in units per hectare – without additional site specific regulation. It is, however, one of the most wide-ranging and permissive zones in the city, contemplating the greatest level of intensity of all residential and commercial zones. No site specific regulation on this site limits the maximum density in units per hectare. The setbacks, step-back and heights provide the only regulatory limit on intensity for this property.

#### **4.3** Form

Under the Neighbourhoods Place Type within The London Plan, new residential development is limited at this location to six storeys with bonusing. Both proposed buildings exceed this policy limit; however, additional policies and guidelines on building form apply to each.

For high-rise buildings, the City Design policies (293\* specifically) direct that such buildings be designed with slender towers and a maximum floor plate of 1000 square metre is recommended. For the front building the first floor above the podium (3<sup>rd</sup> floor) the floor plate is 2400 square metre approx., and continues to exceed the recommended 1000 square metre on all floors until the 15<sup>th</sup>. The rear building also exceeds the recommended floor plate for the first 4 floors of residential use. To minimize the massing and shadow impacts of the two buildings, the Applicant has incorporated multiple step-backs to mitigate impacts on the surrounding low-rise neighbourhood. The tiered formation of the buildings also reflects Zoning requirements.

Form in relation to the existing neighbourhood is another policy requirement for consideration. Specifically policy 298\* reads "appropriate transition of building height, scale and massing should be provided between developments of significantly different intensities. This may be an important consideration at the interface of two different place types." While the DA1(1) Zone regulations permit 0.0m setbacks, Staff has requested the applicant to provide screening, in particular vegetated landscape

treatment, in recognition that at this location the proposed development has an interface with different development types surrounding the identified lands. The setback would also recognize the interface with the adjacent heritage properties and aid in transition from a low-rise character to more intensive development. As of the writing of this report, the Applicant has submitted elevation and plans that support an increased setback and vegetative screen along the most easterly boundary.

Considerations of building form for the Heritage Alteration Permit are Sections 5.10, 8.1, and 8.2 of the West Woodfield Heritage Conservation District Plan that provides heritage <u>guidelines</u> for new and infill construction. Those relevant to this application include the following:

- "....for the design of new buildings taller than 3 floors, should be required to provide an adequate transition to neighbouring building types and heights, as well as being sensitive to the quality of the elevation contributed to the rest of the street." (WW-HCD Plan, 8.1.9).
- New development shall be sensitive to and compatible with adjacent heritage resources on the street with respect to height, massing, built form and materials." (WW-HCD Plan, 8.2.7.3)

As indicated above, the Applicant has incorporated multiple step-backs, and an increased setback from the east property limit to mitigate impacts on the surrounding low-rise neighbourhood.

There are some minor Zoning discrepancies that can be addressed without significant redesign. The requirement to meet 20.3.3 of the Zoning By-law limits the height and step-back at any given point on the property. The minor adjustment that is required to comply with Zoning is illustrated on the below elevation underlay with the blue broken line to show the specific locations requiring adjustments. In this case, height being defined as "the highest point of the roof surface or parapet wall".



This development proposal has been before the Urban Design Peer Review Panel, on May 15, 2019, at which time the Panel indicated support of the building siting and orientation along Wellington Street, and stated that "the use of glazing and solid materials at the podium level appear to create an appropriately scaled urban experience at the street level". The Panel offered suggestions regarding the towers height and benefits with a reduction/simplification of the "stepping" treatment. The Panel also suggested further revisions to the parking garage design to better incorporate the structure into the overall development. The Panel recommendations are included herein as part of Appendix "C".

# 4.4 Archaeology

The subject lands have been identified as having archaeological potential through the City's archaeological master plan. Clearance is required prior to site plan approval. Staff have been informed by the applicant that archaeological work is complete and with the Ministry for review. Final site plan approval will be contingent on the results and recommendations of the archaeological review and associated findings.

# 4.5 Heritage Status and Heritage Alteration Permit (HAP)

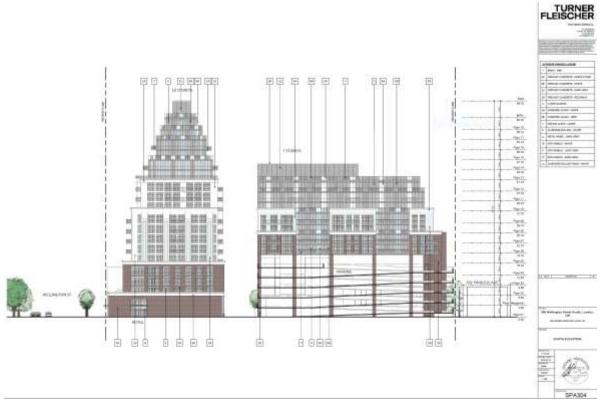
The property at 556 Wellington Street is a heritage designated property located within the West Woodfield Heritage Conservation District (WW-HCD), which was designated pursuant to Part V of the *Ontario Heritage Act* (*OHA*) in 2009. As/per the *Provincial Policy Statement-2014*, the *Ontario Heritage Act*, and *The London Plan*, heritage resources are to be conserved and impacts evaluated. For evaluation purposes, a heritage impact assessment (HIA) was submitted by Golder Associates Ltd., dated May 13, 2019. In addition, in accordance with Section 42 of the *Ontario Heritage Act*, the property owner has applied for a heritage alteration permit (HAP) to allow the construction of the proposed development on the subject site.

The HAP was considered by the London Advisory Committee on Heritage (LACH) at its meeting on September 10, 2020, and the report from LACH is an agenda item on the September 21, 2020 Planning and Environment Committee meeting to be considered by Committee and Council together with this report. The issuance of a Heritage Alteration Permit is a requirement of Site Plan Approval and building permit.

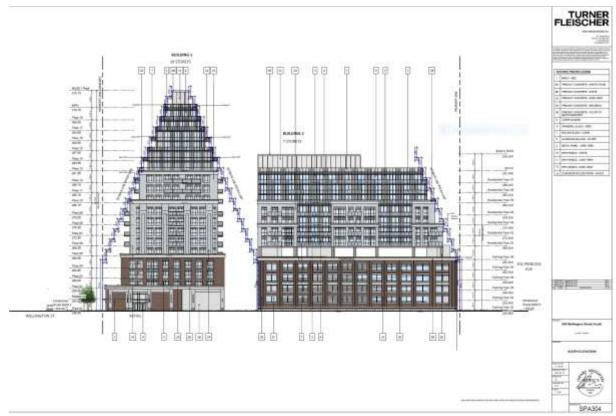
Throughout the Site Plan review, staff have requested that consideration be given to establishing a transition in height from the new development to the adjacent lower scale neighbouring building typologies that is compliant with the intent and direction of goals, objectives, policies and guidelines of the *WW HCD Plan* (5.10.2). These requests have been made noting that the *WW HCD Plan* (5.10.2) suggests 8 to 10 storeys may be appropriate for new development in this location given the adjacent low-rise neighbourhood character. The WW HDC Plan, however, does not prescribe height restrictions and the language used related to heights does pose implementation challenges, especially in relation to the zoning permissions available to the site.

#### 4.6 Elevations

Through the various iterations between first and fifth submissions of the Site Plan, the Applicant has demonstrated movement towards addressing identified transition and interface issues between the proposed development with the predominantly low-rise character of the existing neighbourhood that surrounds the subject site. The below comparison illustrates the nature of the changes.



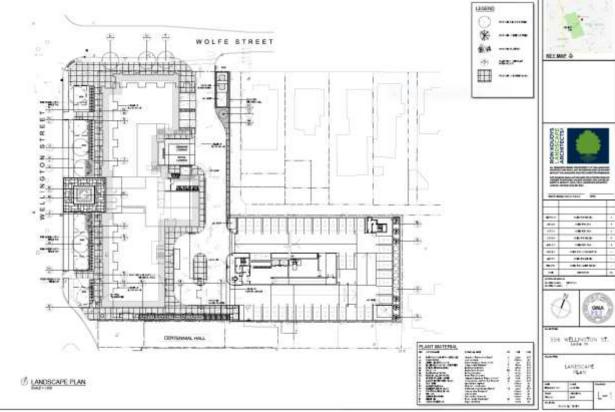
South Elevation: First Submission, May 16, 2019



South Elevation: Fifth Submission, August 12, 2020

At the time of the writing of this report, the Applicant further demonstrated their willingness to address a requirement of the Site Plan Control By-law by increasing the most easterly side yard setback of the rear building from 0.6 m to 3.0 metres and to incorporate landscape screening. The intent of the submitted revision is to address the interface between the parking garage and the existing residential dwelling located at 300 Princess Avenue. The south elevation, below, depicts the newly revised 3.0 metre setback, and the landscape plan shows the addition of trees and vegetated plantings in within the identified 3.0 metre side yard. Notwithstanding that the recent revision still requires review by Staff, the intent is to show the progressive movement by the Applicant to address an identified interface issue.





It is noted that the landscape vegetation is proposed to include six Canadian Hemlock trees, of which three are located within the direct interface between the existing residential dwelling to the east and the proposed parking garage; seven flowering dogwoods between the interface of the residential dwelling surface parking lot and the proposed parking garage; and nine hosta plants are proposed to be planted intermittent along the entire landscape treatment.

### 4.7 Parking

Automobile parking is provided by 550 parking spaces both in two below grade levels and in five-storeys of structured parking in the rear building. This is in excess of 16 parking spaces required by the by-law to service the commercial uses. Were the site not zoned DA1 at this location and residential parking was required, the parking provided would still include 129 additional spaces beyond the one per unit benchmark (534 minus 405 at one space per unit).

Section 6.2 of the Site Plan Control By-law identifies the intent of limiting impacts of parking areas on neighbours. Further, Section 6.5 of the Site Plan Control By-law directs parking structures to include architectural treatment and landscaping to soften the impact to surrounding property. As noted in the section on Elevation, above, the Applicant is proposing to increase the most easterly side yard setback to 3.0 metres and incorporate a vegetated landscape treatment to address the interface between the proposed parking garage and existing residential building, located at 300 Princess Street. In addition, as illustrated in the fifth submission, above, the Applicant has modified the design and material of the parking garage in precast concrete coloured to match the masonry at the ground level of the front building.

### 4.8 Outstanding Site Plan Comments

Fourth submission site plan control comments were provided to the applicant May 29, 2020. The fifth submission, submitted on August 12, 2020, is under review. Outstanding requirements include the following:

- Archaeological clearance is required from Ministry of Tourism, Culture and Sport prior to approval of plans and registration of Development Agreement.
- Issuance of a Heritage Alteration Permit prior to approval of plans and registration of Development Agreement.
- Drawing amendments for the parapets to comply with the Zoning requirements, as illustrated above.
- Address the architectural detail (as it relates to materials, windows, and doors) on the southwest corner of the front building in keeping with the west and north facades, and northwest corner treatment. Noting that as part of the 5<sup>th</sup> submission package the southwest corner has incorporated additional features matching those on the northwest corner to tie the building ends together.
- Elements to limit the impacts of the rear building parking structure on the immediate neighbours, in accordance with Section 6.2 and 6.5 of the Site Plan Control By-law. Noting that as of the writing of this report the Applicant submitted a revision that shows a 3.0 metre setback and landscape treatment along the east property limit.
- Revise internal water hydrant in accordance with the Ontario Building Code.
- Warning clauses for noise are to be included in the Development Agreement following the findings of the Noise Study.

# 5.0 Conclusion

The proposed Site Plan is consistent with the intensification policies of the Provincial Policy Statement. The proposal is not supported in terms of use or form by either The London Plan or the City of London Official Plan, 1989. Notwithstanding the Official Plan policy framework, the application has been reviewed in accordance with the Z.-1 Zoning By-law, and, as proposed, complies with the use provisions. With minor drawing amendments the Applicant could achieve the required step-back and height regulations of the Zoning By-law. Prior to Site Plan approval, further revisions are required to the proposed site plan, landscape plan and elevations that will result in development that is in compliance with the Site Plan Control By-law; archaeological clearance is required from the Ministry of Tourism, Culture and Sport; and the issuance of a Heritage Alteration Permit is required.

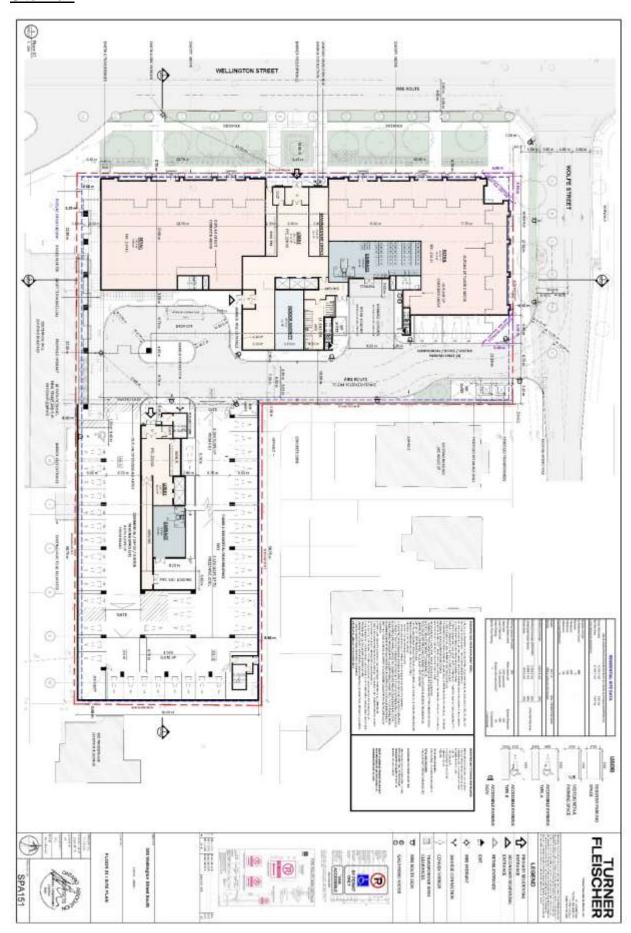
Prepared by:	
	Leif Maitland Site Development Planner, Development Services
Recommended by:	
	Paul Yeoman, RPP, PLE
	Director, Development Services
Submitted by:	
	George Kotsifas, P.Eng.
	Managing Director, Development and Compliance Services & Chief Building Official
The opinions contained herein are offered by a person or persons qualified to provide expert opinion. Further detail with respect to qualifications can be	
obtained from Development Services.	

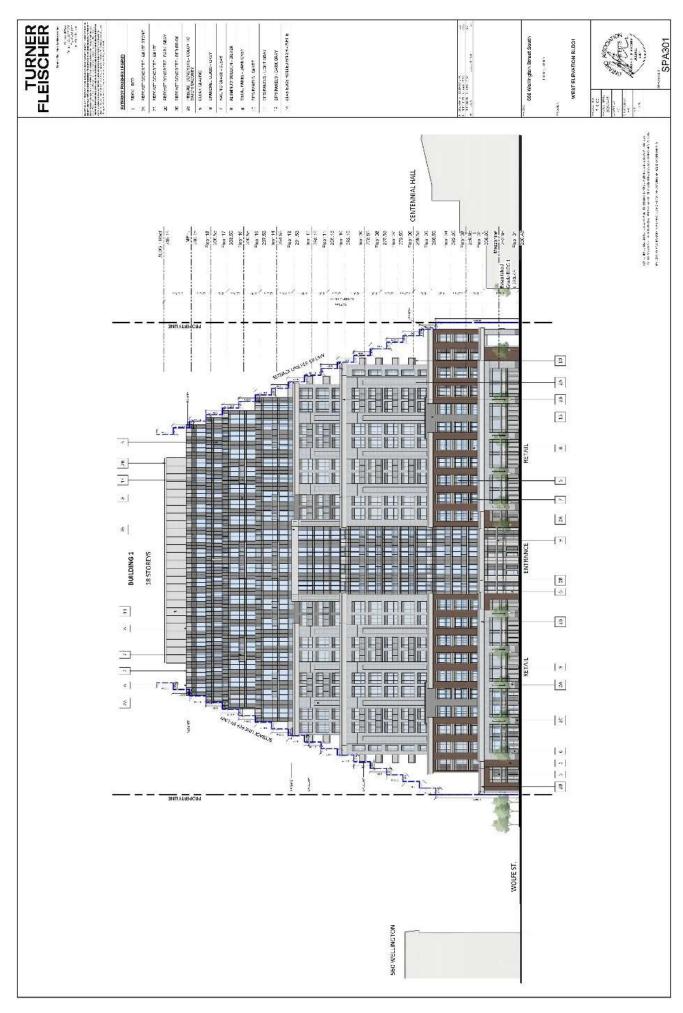
September 14, 2020 LM/mp

CC: Heather McNeely, Manager, Development Services (Site Plan) Michael Pease, Manager, Development Planning Ismail Abushehada, Manager, Development Engineering

# **Appendix A: Plans**

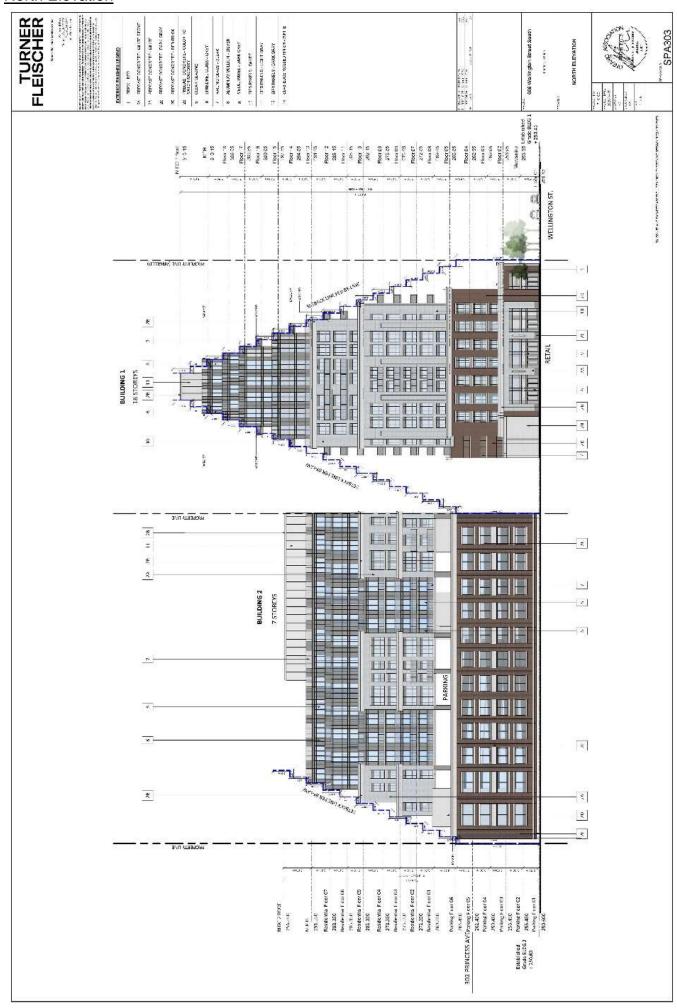
# Site Plan





The Elevation above shows the front building for the current proposal as viewed from Wellington Street as submitted and is subject to change.

# North Elevation



The elevation above shows the current proposal for the north elevation of both buildings as viewed from Wolfe Street and is subject to change.

### **Appendix B - Public Engagement**

#### **Nature of Liaison**

On July 3, 2019 Notice of Application was posted in the Londoner, and circulated to landowners within 120m of the subject lands

The purpose and effect of this proposal is to develop the subject lands, as shown on the attached plan. The Site Plan, as proposed, would result in an 18 storey residential apartment building with commercial space on the first storey along Wellington Street, and a 12 storey residential apartment building at the rear of the property including a 5 storey parkade at the base.

# **Comments Received**

Re: Notice of Application for Approval of a Site Plan Control Application,

File # SPA19-046

Municipal Address: 556 Wellington Street

I would like to bring to attention that the property subject to the site plan control application (File # SPA19-046), located at the southeast corner of Wellington and Wolfe Streets, relates to a known and registered archaeological site (AfHh-244 – the Victoria Park site). The Victoria Park site includes lands that formed part of the occupation by the British Military Garrison, dating from 1837 through to 1869, in what is now the City of London. More specifically, the property in question is known to be location of what is termed the "Log Barracks."

The Victoria Park site is a site of extreme historical and archaeological importance. Not only is it of local and regional significance, but it is also of provincial and national importance. At the time it was established, the London garrison was the largest British force in Canada west of Toronto. It played a crucial role in the security of the region in the mid 19th century, from the months following the Rebellion of 1837 through the period of the American Civil War and the Fenian Raids of the 1860s. The last years of the barracks post-date the withdrawal of the troops and pertain to civilian uses of the complex, including the use of the political evolution of the region, from the transition of Upper Canada to Canada West, and the establishment of the Dominion of Canada and the Province of Ontario.

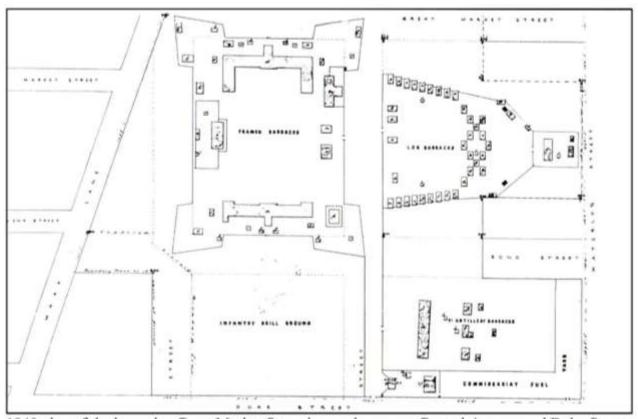
Of relevance to the approval application for the proposed 18 storey building, the subject property is located in an area deemed of high archaeological potential, as noted in the 2017 City of London Archaeological Management Plan. As is shown in the 1849, 1850 and 1867 Plans for the British Military Garrison, what is currently the Kiwanis parking lot was home to the Log Barracks (see attached). As has been proven with past archaeological investigations and having been involved with those investigations on and off for the last 20 years in the adjacent Victoria Park, it is known that there is most certainly remnants of the Log Barracks and of the occupation of the lands by the British Military Garrison beneath the existing Kiwanis parking lot, which forms the subject property. Not only will there be building footprints, but also there is a very high potential for other cultural features such as middens (refuse disposal areas), privies (outhouses), wells, drains and other unknown structures that do not appear on the surveys or site plans for the garrison.

The ultimate goal of archaeology is to preserve archaeological sites through avoidance, or to state otherwise, protect the site from development. To reiterate, the Victoria Park site is an archaeologically rich site with immense cultural heritage value and interest. As the subject property includes lands that relate to the British Military Garrison occupation, by default, it too may have equal significance and should be treated as such. Given this, I feel that it is the City's responsibility to protect this valuable and irreplaceable archaeological resource and to consider it strongly in moving forward with the proposed site plan approval.

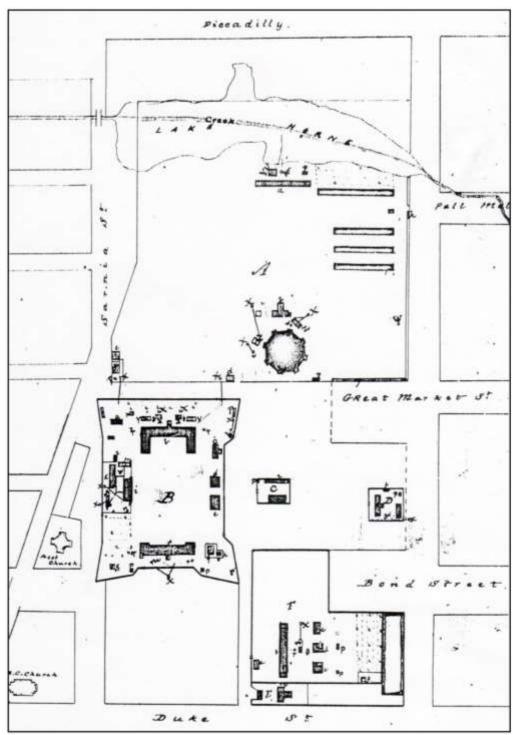
I would also recommend that, should the City decide to approve the plan, as part of the City's due diligence, inform the developer of the requirement to conduct an archaeological assessment and to make them aware of what this will entail and the need to plan for such an archaeological assessment in their construction schedule and budget.

Attached to this document are three military plans documenting the location of the Log Barracks. Also provided are select images of excavations at the Victoria Park site with the intent to demonstrate what lies beneath the pavement (and lawn) that remain intact. Sincerely,

Sherri Pearce Professional Archaeological Consulting Licence P316 90 Caprice Crescent, London, ON N5V-3M2



1849 plan of the barracks. Great Market Street is now known as Central Avenue and Duke Street is Queen's Avenue.



The 1867 plan shows that some changes have occurred to the Log Barracks; however, buildings relating to the British Military Garrison are still present within the subject property.

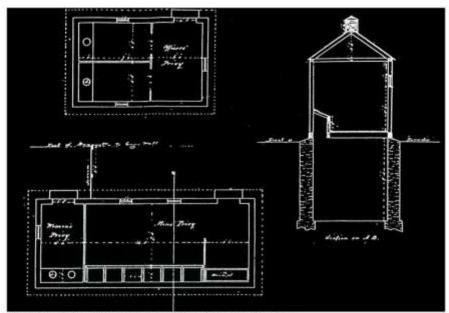


The 1867 plan shows that some changes have occurred to the Log Barracks; however, buildings relating to the British Military Garrison are still present within the subject property.



Floor of Stone Lined Cellar in Officers' Quarters.





1840 Plan of the Soldier's and Men's and Women's Privies.



Overlay of the plan for the soldier's privy with the excavated Feature 11 privy.



West wall profile of the Soldier's Privy (Feature 800: NW Corner, Victoria Park).



Officers' Privy - Loop Path, Victoria Park.

Good afternoon Mr. FitzGerald.

We are writing to provide some information on the documented archaeological remains that are of concern for test and mitigative excavations within the proposed construction of the residential and commercial development at 556 Wellington Street. It encompasses part of a very significant archaeological site: the mid 19th century British Military Log Barracks. The site will already have been red flagged as an important unregistered archaeological site by the archaeological master plan of the City of London.

The lands that will be impacted by the proposed development have been inaccessible to archaeological investigations for decades, ever since the Kiwanis parking lot was constructed. Prior to that, those lands consisted of large residential lots with mansions that fronted on Wellington Street, all of which had front and back yards. Given the land use history of this property, it is inevitable that the proposed development will contain a wealth of well-preserved archaeological resources. The same has been the case for every large downtown development in Ontario cities that has been the subject of an archaeological assessment, including the Talbot Block in London in the 1990s.

The attached details some of the concerns we have for the proposed development. For the record, my firm has no financial interest in the archaeological assessment of the property, as we retired from fieldwork in 2016.

Regards,

Dana Poulton and Christine Dodd, D.R. Poulton & Associates Inc.

Enclosed:

Dan FitzGerald
Development Services,
6th Floor City Hall
City of London,
P.O. Box 5035,
London ON. N6A 4L9

July 29, 2019

RE: Municipal Address: 556 Wellington Street

GWL Realty Advisors/London Life Insurance Company c/o Zelinka Priamo Ltd.

File Number: SPA19-046

Dear Sir

Between 1995 and 2015, working on behalf of the City of London, D.R. Poulton & Associates Inc. conducted archaeological assessments of Victoria Park. The focus of these assessments was the Framed Infantry Barracks, which formed the single largest building complex in the 73-acre British Military Reserve in London. Individual assessment reports by D.R. Poulton & Associates also included reference to, and details on, the Log Barracks directly east of what is now Victoria Park.

Most of the southern half of the Log Barracks building complex falls within the proposed GWL Realty Advisors / London Life Insurance Company development at 556 Wellington Road. The Log Barracks was the earliest barracks the British constructed. It dates from 1838 and most of it was demolished in 1850. As such, whatever survives of this barracks would be an excellent example of an archaeological time capsule. The Log Barracks covered an area 2-3 hectares in size. It included some 49 separate buildings. Nineteen of them housed soldiers – 15 for the infantry; and four for the Royal Artillery. As the name implies, the Log Barracks was constructed of hewn logs, probably from trees that were felled to make way for the 73-acre Military Reserve. Each of the buildings in this barracks that were used for accommodation measured 16 feet by 24

feet (4.9 metres by 7.4 metres) and could house 20 men (D.R. Poulton & Associates 1998: 10). The Log Barracks also included cells, a guard house and a defaulter's room (identified as a prison on later plans), three staff sergeant quarters, three cook houses, a washing house, an armourer's shop, a library, tailor's and shoemaker's shops, two gun sheds, three privies, an old school room (later an engineer's office), three wells and two ash pits (*Ibid.*). In addition, it included the Log Hospital. This building had a long life. From 1858 to 1862 it served as a civic hospital and in 1871 it became the House of Refuge for the poor of the City of London (Seaborn 1944: 228).

We have attached a series of contemporary plans that show the Log Barracks, two of which are overlaid on the modern streetscape. One of the overlays is based on an 1849 plan, which includes most of the buildings that ever-formed part of this barracks, and the other is based on an 1853 plan, which was produced following the demolition of most of the structures. As you can see, the barracks evolved and devolved over time, but it originally consisted of a horseshoe-shaped complex that fronted on what later became Wellington Street.

Based on the above, roughly one-quarter of the buildings in the historic Log Barracks complex fall within the site of the proposed development. They include the prison and about a dozen of the soldiers' quarters. How well preserved the archaeological remains of this complex are remains to be determined. However, our experience in working in the adjacent Victoria Park for almost 20 years suggests that the City, the landowner and the developer should all accept that there is a strong likelihood the archaeological remains of the Log Barracks within the proposed development will be well preserved, and that it will be a major undertaking to excavate the site, to analyze the remains and to ensure their long-term curation in a suitable public repository.

Regards

Dana Poulton
President
D.R. Poulton & Associates Inc.

Christine Dodd Senior Archaeologist D.R. Poulton & Associates Inc.

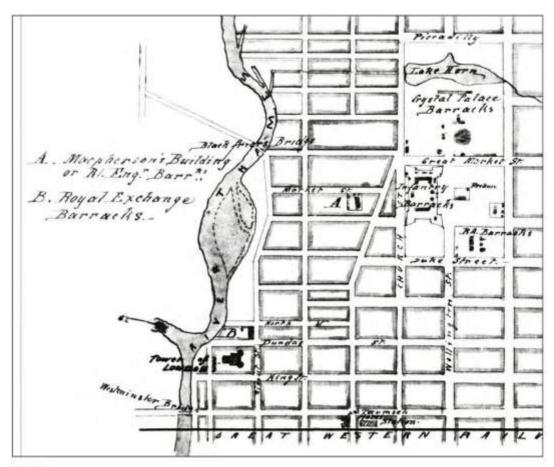
Referenced Cited

D.R. Poulton & Associates Inc.

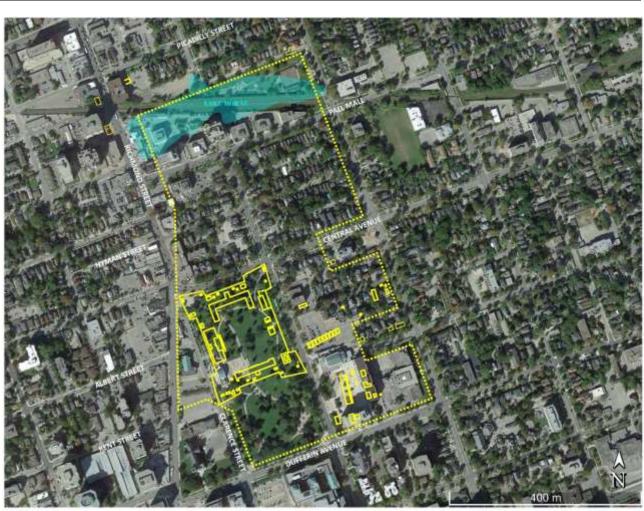
1998 The Stage 1-2 Archaeological Assessment of Victoria Park, City of London. September 1998. Report on file City of London and Ontario Ministry of Tourism, Culture and Sport.

Seaborn, E.

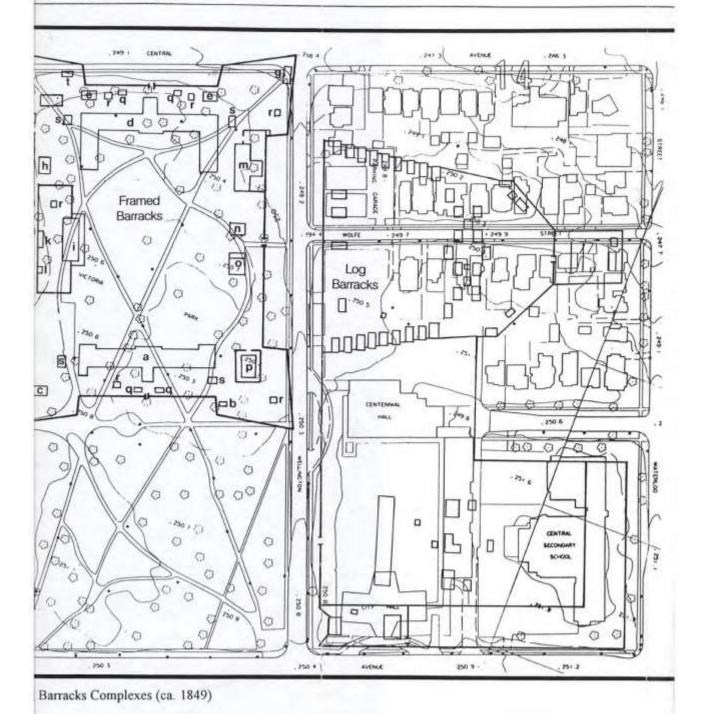
1944 The March of Medicine in Western Ontario. The Ryerson Press, Toronto.

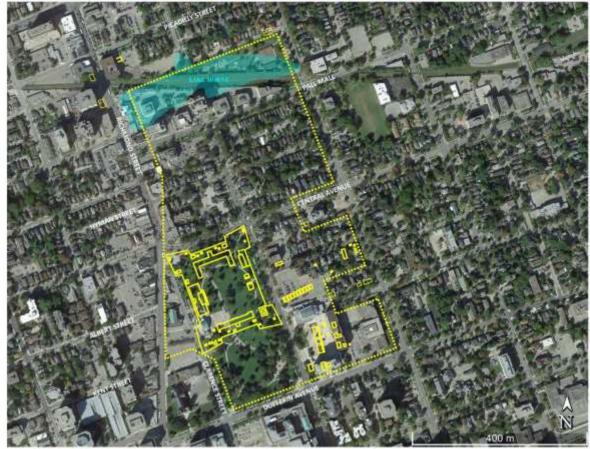


1866 Plan

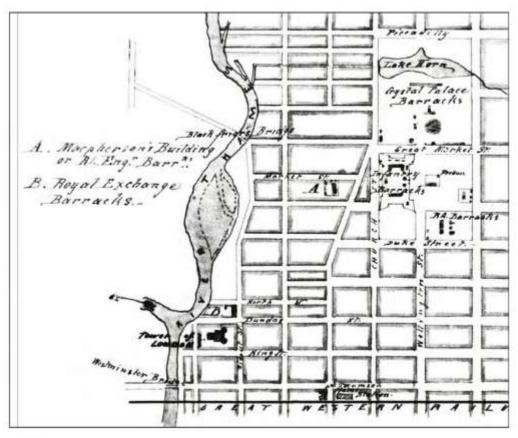


1853 Plan





1853 Plan



1866 Plan

Dear Mr. Fitzgerald.

My apologies if my thought are going in different direction as yours in regards the Victoria park and the developments planed around.

I have lived in this city enough time to suffer the orthodoxy of the "limitations" the city of London have put to the "open living concept". I strongly believe that there are some deep changes that have to happen into the local government in order to become this city a more productive city putting aside the aspects of the old way fashion living.

Cities grow Mr, Fitzgerald, in that way the human side of the cities evolve into a more modern living style as well. In my long time living in this city I have seen the Victoria park sub utilized, the only time of the year this park is crowded is on the Sun Fest, which is something need to have changes as well by the way, too much of the same year after year, same thing, no changes, we need to evolve.

The proposed projects (high rise developments) are opportunities that needs to be addressed with the propose to develop a more dynamic city, no sticking us in an orthodox city where the only orientation is becoming the city a nursing home.

Why not instead the city assess new business opportunities (different that the current) oriented to expand the concept of the innovation into a city that has to see the youth moving to other more adapted cities to the newest generations.

We have to expand the concepts of living with more productive opportunities instead keep saving trees and areas that are not potentially used for the mass. Victoria Park is just a park, it is an area in core downtown that require also changes. New developments around this park are mostly buildings creating more business space in downtown, it is important to understand that Victoria park is not even a place that people around can go for finding lunch or dinner while working in the surrounding area. Victoria park "needs also changes".

What you are trying to avoid is a new generation of potential users living or working around downtown creating a traffic the slow people do not want to face, now here is the question, how many of the Londoneers use the Victoria Park on regular bases? I live around, I can say by experience, very little number of people use this park on regular bases. I am an outdoor person and I consider the downtown area need changes as much as the whole city. There are so many important things to get resolve in this city instead to be spending time, effort and resources trying to keep this city living in the 1900, let's move forward with better and more dynamic proposals that bring to this city a NEW SENSE OF LIVING.

VICTORIA PARK NEEDS CHANGES AS MUCH AS THE WHOLE CITY, I guess the best is getting the opportunity to participate in the decisions.

Manuel Romero.

Thank you for sending me the SPA19-046 site development proposal pertaining to 556 Wellington.

Why not make it clear to the public that SPA19-046 is not a rezoning application?

The proposed development is "as-of-right" subject only to site plan approval.

556 Wellington proposes 12 and 18 stories intruding into Woodfield all the way to dwellings on Princess.

And yet the 560/562 Wellington proposal a much less intrusive proposed development, is being denied.

High density development on both sites is reasonable and appropriate.

Ben Lansink, Woodfield Rate Payers Association 507 Colborne Street, London, ON N6B 2T6

It should not be more than 8 stories same as Auburn. Wolfe St is residential.

"BOB" 621 Waterloo St

\_\_\_\_\_

I believe in density and infill in the downtown but I am strongly against ruining the heritage and human scale of Victoria Park as we do it.

I relocated to London when I was recruited for a job last year. I had many choices of where to live and work and, quite frankly, hesitated because we could not find anywhere in London that met our desire for a walkable urban neighbourhood. The downtown is largely a mess of parking lots and bad development. It is both unappealing and does not feel safe for a woman walking at night...or in the day on some streets and corners. However, when I found Victoria Park and Woodfield I decided to take the job and move to London. I know several other young professionals who have similar requirements, are mobile, and have chosen my neighbourhood for these same reasons. We bring high tax dollars to the city and retail dollars to the stores and restaurants downtown. And, quite simply, we want it to be attractive. Destroying Victoria Park with high-rises will truly leave London without a hub and without an attractive and walkable urban area of the sort that is well known to attract mobile professionals and knowledge workers. This at a time when cities around the country and globe are trying to make their downtowns more green, more walkable, and more human scale.

In short, London is simply going backwards with the proposed Great West Life development at 556 Wellington Street.

I sincerely hope London City Council and the Planning Department is more far-sighted than to destroy the one attractive part of downtown we have left."

Allison Montgomery

# Dear Dan Fitzgerald

I was extremely distressed to read the application for site plan approval for 556 Wellington. The 18 storey apartment building and 12 storey building behind it would have a devastating effect on Victoria Park and on all the thousands of Londoners who enjoy the park every day.

This property is part of the West Woodfield Heritage Conservation District. The goal is to protect the character of the neighborhood and to keep all buildings less than 2-3 storeys.

If this development is allowed, it could create a wind tunnel effect similar to what occurs at Dundas and Wellington with the large high rise buildings there. There would be increased traffic from the large number of tenants of the apartment. The building will shadow the park and limit the sunshine reaching it. Tenants may complain about the summer festivals that occur each summer and bring thousands of residents and tourists to the city.

If this building is allowed to proceed, others will follow, resulting in the destruction of Victoria Park as the peaceful oasis many enjoy.

I have been a resident of Woodfield for the past 23 years and walk in the park almost every day. I have voiced my concerns for the past 3 years about the dangers of this development. Many of my fellow Woodfielders and thousands of Londoners have signed petitions opposing this development. Please do not allow greedy developers to destroy London's crown jewel: Victoria Park.

There are many areas around the city that can be developed such and former health unit at King and Ridout, or Talbot and Ridout. There is only one Victoria Park. Do not destroy it.

Please add my voice to the thousands who oppose this development.

Sincerely

Ruth Hoch

The application to build an 18-storey high-rise at 556 Wellington Street, if approved, will be the downward spiral that will destroy VP as we enjoy it today, a tranquil, open oasis with 5 storey buildings and no retail outlets.

This high-rise at 556 Wellington Street, if built, will initiate future highrises on Victoria Park's perimeter. London's citizenry and tourists will avoid VP as it becomes engulfed with high-rises. This will have a negative impact on London's social core and economy.

City Council has a duty and obligation to pass on Victoria Park unblemished for future generations.

I request City Council reject the application for the high-rise at 556 Wellington Street.

Mary Frances O'Hagan 460 Wellington Street, King's Court, London, ON

RE: Proposed Development 556 Wellington Street

As a homeowner and resident on Pall Mall Street (between Colborne & Maitland) I have reviewed the preliminary plans for the proposed development and have no pressing objections at this time.

I am also a member of the Piccadilly Area Neighbourhood Association however will stress that any opinions expressed below are personal and not intended to be representative of any group.

The plans are aesthetically pleasing, the building slopes away from the park thus mitigating any concerns regarding blocking sunlight, it will add new residents and businesses to the neighbourhood and the downtown in general.

That said, a little constructive criticism and observation if I may.

#### Parkade on Wolfe

Where the front of the building (along Wellington) should add to the park setting, the parkade component (according to the plans) might appear a bit of an eyesore and if I was living next to it I'd be concerned for my property value, safety and security. I would encourage to developer to find a suitable façade that would enclose the area and would insist that the whole property has adequate security. I believe the parkade in question will be flanked by the rears of some properties and Centennial Hall. All the more reason to address any and all security concerns.

Some concerns may be raised on the increased traffic flow as a result of the parkade but I do not believe that will be a problem.

#### **Retail Spaces**

The ground floor retail spaces should be consistent with the themes of Victoria Park and the area in general. The property should compliment the park, not detract from it. Cafes, art & crafts etc. - Not big chain operations or stores that encourage loitering and litter.

Owner Occupied

If the intent is to build a property for rental accomodations only, my views may change dramatically. Owner occupied or long term rental residences are usually better managed, better maintained and bring buying power to the neighbourhood. Short term rentals, student rentals and or AirBnB (or equivalents) will detract from the area and I would wholeheartedly oppose any intent to propose such a business model.

### Victoria Park Upgrades and Maintenance

With increased interest in development around the park, the city should seek concessions, and developers should agree, to upgrading and helping maintain what would essentially be the major attraction to their properties and subsequent values. I would suggest that if not in place already, conditions be set so that no development can occur without and appropriate investment into the public space.

Thank you in advance for giving consideration to the above comments.

Regards,

Norman N. Sproule 441 Pall Mall Street London ON N5Y 2Z3

Hi Dan, After our conversation and reviewing the site plan, I am sending you our comments/concerns regarding the site plan for 556 Wellington Street, London On

#### ACCESS TO PARKING GARAGE:

We are very concerned when we heard that there were 544 vehicles entering and exiting the parking garage from Wolfe Street.

Wolfe Street is a narrow, one block, 2 way street, that already gets speeding drivers using as a cut-over both ways.

The pedestrian step-off/sidewalk at Victoria Park where Wellington & Wolfe meet is very hazardous for people crossing the street today, let alone when drivers are exiting or entering the proposed parking garage on Wolfe.

This will inevitably cause high traffic congestion/jam when they are turning right onto Wolfe from Wellington or left onto Wellington from Wolfe or right onto Wellington and getting caught by the stoplights 500 yards away at Central.

Recommendation: access to proposed garage off Wellington at south end of 556 Wellington where present parking access is so half way between both stoplights (Dufferin and Central) to reduce traffic back up on Wolfe which is a tight narrow corner.

### STREET LINE

We also noticed that the building has not maintained the street line that was originally set back in the late 1800's when homeowners were building and then was deemed a building requirement/by-law by the West Woodfield Heritage Conservation District. The developer has the building nesting right to the sidewalk.

Recommendation: As Wolfe is a narrow and tight street, the proposed building needs to step back to line up with the Heritage homes/buildings so the street scape/line is even all the way to Waterloo. This will provide a clear site line from Victoria Park to Waterloo Street and will not suffocate the street.

Thank you - If you require any clarification, please call me directly. Alicia

Alicia Nelms Nelms Group Ltd. City Centre Apartments

### Dear Dan,

I just received the application for development at Wellington and Wolfe Sts. I that see the developers wasted no time submitting a new application since the city's secondary development plan for Victoria Park came out.

I just wanted to register my deep disappointment over the plan to raise height limits around the park, even if 18 stories on the east side is a concession to the heritage district. After one tower goes up, more will certainly follow (in fact, a single tower would look quite unbalanced), and we'll soon be bathed in the shadow of large looming objects.

I had hoped that the city would preserve existing building heights limits around the park, but there's seems to be no hope of stopping the tide of development. This is truly depressing.

LZ Lynne Zarbatany 41 Palace St. London, ON N6B3A6

### **Appendix C: Urban Design Peer Review Panel Recommendations**



# Memo

**Proponents** To:

Russell Fleischer, Principal, Turner Fleischer Architects

From: Urban Design Peer Review Panel (UDPRP)

- Steven Cooper, Architect
   Ryan Ollson, Architect

#### Regrets:

- McMichael Ruth, Architect
- Tim O'Brien, Landscape Architect

#### Conflicts:

Heather Price, Urban Designer

Pre-submission Concept: 556 Wellington Street Presentation & Review, May 15, 2019

The Panel provides the following comments the submission:

- The Panel is supportive of the current building base. The scale, proportion and material selection appear to be in character with that of the surrounding urban context.
- The massing of the building may benefit from reducing / simplifying the setbacks from floors 13 and above (the grey and white coloured spandrel panel clad floors). Furthermore, the massing may benefit from these floors aligning, perhaps with the middle setback, so the top of the building reads as a glass tower sitting on the lower masonry/concrete clad base elements.
- · Should the setbacks be reduced at the upper levels, consideration should be given to moving the glass clad tower portion southward on the base below. This would break the symmetry of the building and provide a greater buffer / setback to the residential neighbourhood to the north, while allowing the taller portion of the building to be more closely associated with the south side of the site.
- The "eastern" building should step back along grid line 'G' (it's west face), to provide additional relief between the tower on Wellington Street while making it feel like a second stand-alone tower, not just a building that was "cut" from its neighbour.
- The Panel asked the applicant to consider introducing more landscaping within the existing surface parking field to break up the visual predominance of surface parking.
- The Panel suggests with the amount of terracing, there may be an opportunity for storm water management through intensive green roofs. Specifically, at the podium level where the rooftop will be most visible by residents.

206 Dundas Street | London ON N6A 1G7 | (519) 661-CITY | www.london.ca

- The Panel suggests the Proponent review the parking garage design further. At the moment it appears to be Architecturally inconsistent with the towers.
- The Panel has questioned whether a traffic study has been undertaken to recognize the amount of traffic that will enter/exit onto Wolfe Street during peak hours.
- The applicant is commended on the demonstrated tree preservation measures and for selecting new tree species complimentary to those in Victoria Park (directly adjacent).

#### Concluding comments:

The Panel is supportive of the building siting and orientation along Wellington. The use of glazing and solid materials at the podium level appear to create an appropriately scaled urban experience at the street level. Several suggestions regarding the towers height and amount of stepping were discussed during the presentation. The Panel understands the basic rationale for these steps, however, the building may benefit from a reduction/simplification of these reductions in mass. The Panel suggests that the project would benefit from a traffic study and further revisions to the parking garage design to better incorporate the structure into the overall development.

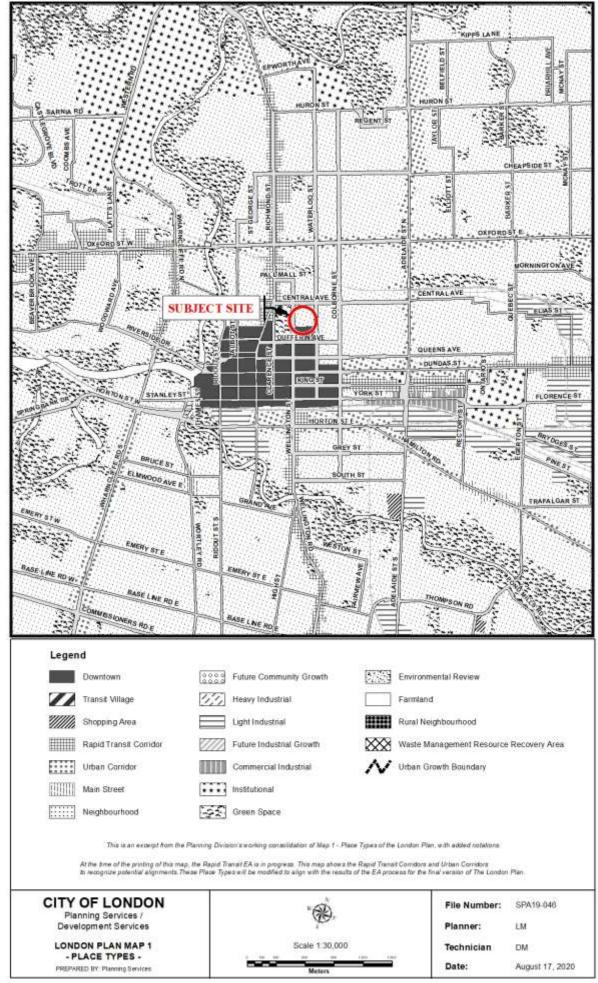
Sincerely on behalf of the UDPRP,

5/2- G

Steven Cooper, OAA, LEED AP (BD+C), UDPRP Chair

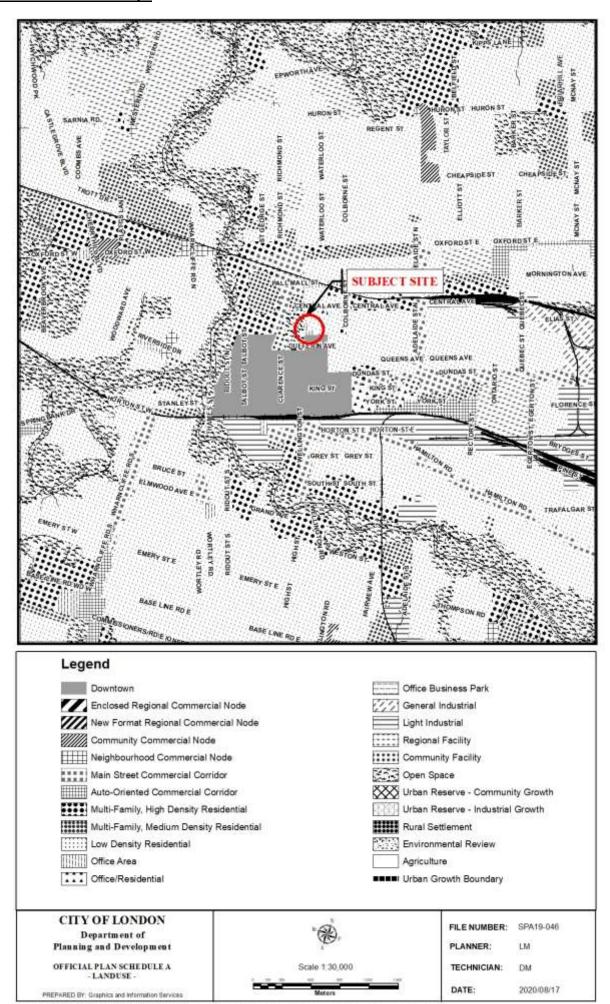
# Appendix D -The London Plan, Official Plan Map and Zoning excerpts

### **The London Plan**



Project Location: G:GisWork\Planning\Projects\p\_officia\plan\workconsol00\excerpts\_LondonPlan\mxdsiSPA19-046-Map1-PlaceTypes.mxd

# Official Plan Excerpt



 $PROJECT LOCATION: e'iplanning' projects' p\_official plan iwork consol/00' excerpts' mixd\_templates' schedule A\_NEW\_b \&ir\_8x14 mixd$ 

# **Zoning Excerpt**

