



**ZELINKA PRIAMO LTD**

*A Professional Planning Practice*

September 17, 2020

Planning and Environment Committee  
City of London  
300 Dufferin Avenue  
London, ON  
N6A 4L9

Attention: Ms. Heather Lysynski, Committee Secretary

Dear Ms. Lysynski

RE: Heritage Alteration Permit Application  
556 Wellington Street  
Our File: GWL/LON/17-01

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Zelinka Priamo Ltd., on behalf of GWL Realty Advisors, have submitted for Site Plan Approval and Heritage Alteration Permit for the above noted lands.

On May 12, 2019, a Site Plan Approval application was submitted to permit the development of one 18 storey and a 7 storey apartment atop a 5 storey parking structure containing a total of 405 residential units with ground floor commercial along the Wellington Street frontage. An additional 2 levels of underground parking is proposed as well.

The application included a Heritage Impact Assessment (HIA) prepared by Golder Associates Ltd., which evaluated the cultural heritage value and/or interest of the significant heritage resources based on the current heritage documents, the designating By-law for Victoria Park and the West Woodfield Heritage Conservation District Plan.

On September 26, 2019 Golder provided the 1st response to Heritage staff comments dated July 11, 2019 (attached).

On February 2, 2020 Golder provided the 2nd response to Heritage staff comments dated November 26, 2019 (attached).

As a requirement of Site Plan Approval, a Heritage Alteration Permit (HAP) was submitted on February 4, 2020. The application included the Heritage Impact Assessment (HIA) prepared by Golder Associates Ltd, along with the September 26, 2019 & February 2, 2020 responses to Heritage staff comments.

The HAP was considered by the London Advisory Committee on Heritage (LACH) at its September 10, 2020 meeting. We attended the September LACH meeting and have had the opportunity to review the Heritage staffs report in relation to the HAP.

With respect, we ask the Committee to reconsider the recommendation made by Heritage staff and LACH to refuse the HAP. While we acknowledge the views set out in Heritage staff's report, we feel the focus of the report was un-balanced and it does not acknowledge any of Golder's responses to Heritage staff comments; and more generally, the many complementary attributes of our client's proposal as it relates to its place and contribution to this neighbourhood

Golder stated in both sets of comments that the implementing heritage documents do not adequately address, nor provide clear and precise guidance on such matters as views/vistas, visual obstruction to and from Victoria Park and 'perceived isolation' of Victoria Park from the District. "Perceived isolation", views to and from the park are not defined in any heritage implementing documents and without that Golder could not evaluate potential impacts on heritage attributes that do not exist.

Golder also responded to the recommended height up to 10 stores in Policy 5.10.2 of the West Woodfield Heritage Conservation District Plan. Golder stated the use of the word 'perhaps' is subjective and the HCD Plan did not prescribe a minimum or maximum height requirement nor can it be reconciled with the existing zoning for the site which allows for heights in excess of 25 storeys. Development Services confirms this view in Section 4.5 of their September 21, 2020 report to Planning and Environment Committee.

Throughout the Site Plan review process, we have been working with Development Services staff to achieve a development that consists of a highly desirable building while respecting the aesthetic quality of the built form within the West Woodfield neighbourhood. The report provided by Heritage staff implies no response was made to their comments, and it does not provide a full understanding of all the progress that has been made.

Through various discussions between the first and fifth submissions of the Site Plan Approval process, we have contributed revisions and improvements to our proposal so as to better integrate our building into the fabric of the existing neighbourhood. Through various commenting efforts we have observed and asserted the unique stable character of the immediate neighbourhood which has undergone significant conversion to higher intensity uses. This character represents, in our view, a level of resilience that affords the opportunity to introduce a high-quality, well-curated high density design such as that proposed in a manner that contributes to this distinct Woodfield precinct rather than impact it. With the proposal largely focused on Wellington Road and the efforts made to soften and transition the rear building, particularly to the parking structure, we feel we have appropriately "woven" our project into the neighbourhood.

The building's massing is purposely broken into three layers (podium, midsection, upper) to help minimize the visual impact of the overall mass of the building within the neighbourhood. A strong urban edge is provided along Wellington and Wolfe Streets through building situation, building

articulation and landscape features that complements Victoria Park and the existing evolving streetscape.

Any views of the proposed building within Victoria Park are largely obstructed by mature trees and the overall massing of the building does not unduly overshadow the park. This is further supported by the City of London's virtual reality presentation provided during the Victoria Park Secondary Plan public process. The presentation provided an opportunity to experience the park with conceptual higher density building adjacent to the park. Overall, many of the views to the tall buildings were concealed by the mature trees, maintaining the character and pedestrian experience of the park.

Lastly, most recently, adjustments were made to increase the setback between the proposed rear building portion of the site and the adjacent dwelling at 302 Princess Avenue. Even though the zoning permits 100% lot coverage, a 3 metre landscaped garden is proposed to allow for additional landscaping to effectively respond to the transitional design goals of the HDC. While the adjoining properties are not notably sensitive in this regard, such additional space will ensure an enhanced positive interface between the older converted dwellings (particularly 302 Princess) and the proposed higher density building.

In conclusion, the proposed development fully complies with the allowable zoning regulations, it introduces a desirable high-density residential opportunity on an underutilized lot and is located on the more urbanized edge of the neighbourhood. Furthermore, this immediate area is perhaps the most resilient part of the West Woodfield neighbourhood, thereby making it uniquely able to welcome the contributions this project has to offer. The proposal introduces a multiple storey mixed-use building of high design that is distinctive, yet complementary with the overall character and form of the surrounding West Woodfield neighbourhood and importantly does not require the removal of any existing heritage resources.

We feel the proposed meets the overall goals and objectives of the West Woodfield Conservation District Plan and we ask that you approve the Heritage Alteration Permit as submitted.

We trust the enclosed is satisfactory to allow a fulsome review of the proposed development and look forward to discussing this matter with Committee on September 21<sup>st</sup>, 2020.

Yours very truly,

**ZELINKA PRIAMO LTD.**



Greg Priamo, BES, MCIP, RPP  
Principal Planner

cc. GWL Realty Advisors