



January 28, 2021

Mayor and Members of Council
The Corporation of the City of London
Building Division, Room 708
300 Dufferin Avenue
London, ON N6A 4L9

Your Worship and Members of Council:

Re: City of London File Z-9155
East Village Holdings Limited (**EVHL**) application for a zoning by-law amendment 690, 696, 6989, 700 King Street, 400 Lyle Street, 701, 725, 729, 735, 737 Dundas Street, and 389, 391, 393 Hewitt Street (collectively referred to as the "**EVHL Property**")

We, the Unity Project, are a homeless shelter that owns and operates its emergency shelter and supportive housing at its property municipally known as 717-721 Dundas Street (the "**UP Property**"). The UP Property abuts and situated immediately to the west of EVHL Property.

EVHL is proposing a zoning by-law amendment for the EVHL Property to permit a mixed-use development having one apartment building being twenty-four storeys in height with a six-storey podium and ground floor commercial space. EVHL is proposing a total of 243 residential units and two levels of underground along with some ground level parking (the "**Proposed Development**").

The EVHL Proposed Development, if permitted, will represent one of the more significant developments in the unique area of Old East Village and will have a considerable impact on the surrounding community including the UP Property and its operations. The Proposed Development is situated within the Old East Village Dundas Street Corridor Secondary Plan area (the "**Old East Dundas St. Secondary Plan**").

Unity Project has been operating in the area for more than 17 years and provides emergency shelter and supportive housing for adults and youth of all genders age 18 and over. Unity Project's goals are to divert people from shelters wherever this is an opportunity; to stabilize participants in a moment of crisis by meeting their basic needs; to help people obtain housing and maintain stability in community; and, works towards preventing or ending the experience of homelessness for its participants. As recently as November 25, 2020 the CBC identified that COVID-19 has exposed a widening economic inequality in the City of London resulting in an increasing number of residents needing shelter. Unity Project provides an increasingly required service at its UP Property to help people in their time of need. More recently as a result of the pandemic Unity Project has expanded its operations.

The Old East Dundas St. Secondary Plan was passed by Council on June 25th, 2019. We note that the EVHL zoning by-law amendment application for the Proposed Development was deemed complete by the City on November 28th, 2019, a full five months after the Old East Dundas St. Secondary Plan was approved by City Council.

The City's Core Action Plan dated October 28, 2019 (the "**Core Action Plan**") confirms that Old East Village is part of the City's Core Area. The Core Action Plan identifies the Old East Dundas St. Secondary Plan as guiding the design of the streetscape improvements along Dundas Street and provided a policy for future development along the corridor.

The Core Action Plan identifies four needs that must be addressed to achieve success and includes: (i) people struggling with homelessness and health issues need help; (ii) people need to feel safe and secure; (iii) businesses need an environment that allows them to be successful; and (iv) the Core Area needs to attract more people. Unity Project address two of these needs alleviating homelessness and providing a safe space for people to feel safe and secure. It is important that any development being proposed in the area does not put the operations of Unity Project and other similar service providers at risk or resulting in its participants and services being pushed out of the area through the gentrification of the area without consideration for the existing area and operations.

The planning report prepared by the City in support of EVHL's Proposed Development of the EVHL Property states that proposed zoning by-law amendment conforms to the in-force policies of the Old East Dundas Street Secondary Plan as it promotes the continued revitalization of the area. This statement while recognizing the importance of the Old East Dundas Street Secondary Plan governing the area and the Proposed Development fails to take into consideration the importance of the character of the existing area and neglects to apply all of the policies to EVHL's Proposed Development.

While it appears that the City has determined that an increase in height is appropriate due to the application of the bonusing provisions it is unclear as to what was provided by EVHL to support the increased height and density being proposed. While parking appears to be mentioned in the City's staff report as a rationale for the bonusing such provision is not set out in the Old East Dundas Street Secondary Plan.

The Old East Dundas Street Secondary Plan provides for bonusing in favour of facilities and services, or matters such as: affordable housing; off-site community amenities; contribution to the development of transit features; secure bicycle parking and cycling infrastructure; façade restoration and other heritage investments; and other facilities or services that provide substantive public benefit. It is unclear as to what facilities or services were provided and accepted by the City to justify the approximately additional 8 storeys on the building and an increase in density from 250 units per hectare to 750 units per hectare.

EVHL has indicated that a total of 13 of the approximately 243 residential units of the Proposed Development will be affordable housing. This is merely 5% of the total units and insufficient for the Old East area and the City as a whole. Particularly in circumstances where it is known that the housing affordability crisis is increasing.

The Proposed Development also ignores that it is situated immediately adjacent to a heritage property, being the UP Property. The UP Property was designated as a heritage property in 2011. The impact of the Proposed Development on the UP Property needs to be taken into consideration. The Proposed Development fails to take into consideration or mitigate any impacts on the UP Property.

The Proposed Development, in providing a negligible number of affordable housing units, and neglecting to protect built heritage resources, is inconsistent with the *Planning Act*, and the Provincial Policy Statement (“**PPS**”) specifically the policies set out below, among others:

1. Under section 2 of the *Planning Act* regard must be given to matters of provincial interest including:
 - h. the orderly development of safe and healthy communities;
 - j. the adequate provision of a full range of housing, including affordable housing;
 - p. the appropriate location of growth and development; and,
2. Policy 1.1.1 of the PPS provides that healthy, liveable and safe communities are sustained by:
 - - a. promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long-term;
 - - b. accommodating an appropriate affordable and market-based range and mix of residential (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;
 - - c. avoiding development and land use patterns that would prevent the efficient expansion of *settlement areas* in those areas which are adjacent or close to *settlement areas*;
 -
3. Policy 1.4.3 of the PPS provides that planning authorities shall provide an appropriate range and mix of *housing options* and densities to meet projected market-based and affordable housing needs of current and future residents of the *regional market area* by:
 - a. establishing and implementing minimum targets for the provision of housing which is affordable to low and moderate income households and which aligns with applicable housing and homelessness plans. ...
 -
4. Policy 1.7.1 of the PPS provides that long-term economic prosperity should be supported by: (e) encouraging a sense of place, by promoting well-designed built form and cultural planning, and by conserving features that help define character, including *built heritage resources* and *cultural heritage landscapes*;
 -
5. Policy 2.6.1 of the PPS confirms that *significant built heritage resources* and *significant cultural heritage landscapes shall be conserved*.

The UP Property fulfills a demonstrated need in the City of London to relieve the homelessness crisis. The Proposed Development falls short on the provision of affordable housing in the Old East Village area and fails to meet the objectives of the Old East Village Dundas St. Secondary Plan. Should the Proposed Development proceed a minimum of 61 affordable units should be provided representing 25% of the total 243 units being proposed.

The Proposed Development and zoning by-law is inconsistent with the PPS and fails to provide adequate affordable housing and recognize the heritage resources in the area, particularly Unity Project’s heritage building.

Unity Project also has serious concerns about the impacts of EVHL's Proposed Development on its building particularly the construction of a building at the scale being proposed along with the underground parking garage.

Unity Project has significant concerns that the construction of EVHL's Proposed Development will negatively impact the UP Property; foundation, drainage and slope stability, particularly in light of the negligible side yard setback being proposed.

Unity Project respectfully requests Council, that for these reasons among the other reasons presented at the public meeting relating to the EVHL's Proposed Development, deny the approval of EVHL's proposed zoning by-law amendment until such time as the issues associated with: the provision of affordable housing; protection of Unity Project's designated heritage building; impacts of the development on the surrounding properties; appropriate development setbacks; compliance with the Old East Dundas St. Secondary Plan; consistency with the PPS; and, maintaining the character of Old East Village, are appropriately addressed.

Unity Project attended the Public Meeting as it relates to the proposed development on January 18, 2020 and submitted detailed comments on the proposed development. Unity Project is formally requesting through this letter and its participation at the public meeting that it be notified of the decision of City Council as it relates to EVHL's Proposed Development and zoning by-law amendment.

Yours truly,



Amanda Grzyb, Ph.D.
Chair, Board of Directors, Unity Project



Rick Odegaard
Treasurer, Board of Directors, Unity Project

c: Cathy Saunders, City Clerk, csaunder@london.ca
Jesse Helmer, jhelmer@london.ca