



October 28, 2021

Dear Mayor & Members of Council:

Re: 560 & 562 Wellington St – Application for Official Plan and Zoning By-law  
Amendment – File OZ-8462

We appreciate being able to bring this amended application back to PEC and Council and would like to thank staff for continuing the dialogue and professionalism shown despite our current disagreement on the appropriate course for this application.

Although the process has continued for almost 8 years since the application was accepted, we believe that the continued dialogue enabled a clearer understanding of the differences and permitted the refinement that is now before Council. Our analysis shows that the proposal is appropriate given the locational attributes and the planning context given its proximity to downtown and being situated within the Core of London which have been directed by the goals and objectives of the City.

As previously noted, the application preceded the approval of the London Plan and the review is subject to the 1989 Official Plan policies, however, we have also considered the goals of the London Plan as we evolved this application. It should be noted that we have had numerous meetings with the public and previously at PEC that illustrated both as many of those in support and those in resistance. We would submit that the community does have support for this application given previous commentary and polling by the London Free Press.

In addition to the submissions of our Planning Consultants, we would like to reiterate some of the rationale that should be considered in addition to the policy review undertaken by GSP Planning Consultants.

## **Context**

The proposal to redevelop the existing 2 and 5 storey office buildings to high rise residential must be viewed in context of the Wellington Corridor as much as being part of Woodfield given its distinct difference in the evolution and transition of the area.

The Wellington corridor which these two office buildings are part, has already seen a transition from the original single-family character associated with Woodfield. This transition occurred in late 1960's and early 1970's with the construction of City Hall, Centennial Hall and Apartments as well as the office buildings at 560-562 Wellington. Even though this 1970 transition was a drastic change from the original single family fabric, there wasn't a negative impact to the wider Woodfield Community and therefore we know there is a resilience in changes in the community. This proposal is a change but it shouldn't be viewed as a negative as many areas at the periphery of Woodfield have areas of transition and incorporate a more abrupt change from single family to high rise residential housing. This transition is a normal and evolutionary aspect for lands adjacent to the downtown's or within the core of a City given the prominence of the area, locational attributes and amenities, employment and entertainment opportunities in pursuit of the fulfillment of a urban lifestyle.

## **Character/Locational Attributes/Prominence**

The identification of the character of an area requires a focused perspective. Although the lands are part of the Woodfield area, it is located on the periphery and within a block that continues to evolve. The immediate area can be characterized as a 'transitional' neighbourhood as the original housing stock has seen conversions to multi family housing units and commercial offices. The locational attributes of the area includes close proximity to employment, retail, restaurants and open space in Victoria Park, all assisted in the natural evolution of the area. The locational attributes of an area heighten the areas prominence and areas in proximity to Downtown continue to share in this evolutionary aspect of most City's, in which London shares. This attribute is something that is needed to maintain healthy cores and downtowns. When an area is defined as 'transitional' it refers to a stage of evolution. This can inform Planners and Councillors on sensitivities relating to the continued evolution of the area and how to measure impacts such as may be presented by a proposal such as this 17 storey proposal.

In determining the appropriateness of a proposal, a review the locational context as well as the policy context is necessary in determining the appropriate planning impacts associated with the proposal. We respectfully submit that this analysis has not be completed by staff and fails to identify the obvious difference between the Wellington Corridor and Woodfield both through its previous redevelopment evolution as well as current state of transition for the immediate block.

The immediate area has seen the transition of the previous single-family homes to more multifamily and office conversions. An 8 storey apartment building has existed in harmony for some time located at Central and Waterloo. Council's recent approval of the Canada Life 18 story building on Wellington Street supports this proposal and urban design aspects associated with the streetscape of Wellington Street.

The issue of height raised by staff has not been reviewed within the proper context. The issue is not the houses adjacent are only 2-3 storeys in height. The issue of height relates to impacts. The sensitivity to height is measured by the context of the area. Is the area a stable single family home with rear yard amenity space or has the rear yards been converted to parking areas due to the changes in land use to more intensive uses? These contextual examples will derive different impacts given the context and therefore have greater or lesser impacts or sensitivities to increasing the height of a building. Given the context regarding this proposal has replaced rear yard amenity space with parking spots. The sensitivity to height is less and therefore increasing height has less impact. The transition of the area, the locational attributes support increase intensification of this area for the City.

### **Intensification/Transit supportive Objectives**

It is important to note that both the 1989 Official Plan and the London Plan direct further intensification of Central London, the Core and areas in proximity of Downtown. This proposal is in complete conformity with that objective and given the evolution of the Wellington Corridor and the immediate context of the abutting area, the proposal is appropriate. The proposal does conform to the Provincial Policy Statement, both the one that existed when the application was accepted and the current PPS.

Not only do the policies direct additional intensification, the recent approvals of an 18 storey building immediately across Wolfe Street, which shares the Wellington streetscape, also endorses the transition of the area and defines the evolutionary character of the Wellington corridor. The historic evolution and separation from the contextual Woodfield neighbourhood as well as the recently approved Canada Life 18 storey development on this corridor is a component of the review that should not be ignored.

The proximity of open space (Victoria Park), employment, retail, restaurants and transit are planning attributes that support this proposal and support the objectives of the City. This proposal will not negatively impact Woodfield's place as a great place to live. It will only serve to enable the retention of existing residents within the area that wish to maintain that inner core lifestyle. The locational attributes will also entice additional residents to the core given the amenity associated with the area. The area has seen change in the 1970's and it has integrated it with the Woodfield area, this proposal will do the same.

## **Development Charges Revenue; Assessment Growth and Tax Revenue**

The proposed 17 storey building is anticipated to have 173 units of 1, 2 and 3 bedroom units. This proposal will yield the following revenues:

**Development Charges (2021 rates): \$2,855,109.00**

**Assessment (est. approx.) \$80 Million**

**Tax Revenue/year (est. approx.): \$1,110,624.00**

### **Summary**

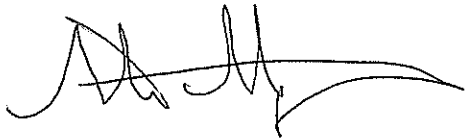
- The locational attributes of this proposal supports and directs intensification and this form of residential housing; and supports the wider objectives of supporting transit, employment and retail and restaurants in the area.
- The characterization of the immediate neighbourhood is different and distinct from that of the Woodfield neighbourhood as it has previously redeveloped and continues to transition to high rise character along the Wellington corridor as witnessed by the Canada Life approval. The existing office buildings are not significant heritage structures and have little relationship with the history or architecture of the area.
- The Policies of the 1989 OP and the London Plan both support intensification in the Core and Central London and specifically areas adjacent to Downtown. The proximity of employment, transit and amenities reinforces the policies within the OP for location of High Rise Residential Land Uses.
- The project will generate significant revenues for Development Charges and Municipal taxes.

### Next Steps

The approval of the Official Plan and zoning bylaw isn't the end of this process. We will also commit to continuing to work with staff if this proposal is approved by Council. We will work through the design considerations in site plan approval and address the housing affordability contributions of this project as well as public art/heritage contributions that may be desired given the historical context. We understand that change is difficult but the locational attributes and context of this project, which aligns with the evolution of the Wellington corridor, should be recognized and supported.

We thank you for your consideration. Feel free to contact me directly if you have any questions.

Respectfully submitted,  
Auburn Developments Inc.

A handwritten signature in black ink, appearing to read 'S. Stapleton', with a long horizontal flourish extending to the right.

Per, Stephen Stapleton,  
Vice President