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November 16, 2021

Heather Lysynski
Committee Clerk
City Clerk's Office
City of London, City Hall
300 Dufferin Avenue
London, ON N6B 1Z2

Attention: Planning and Environment Committee

**Re: Official Plan and Zoning By-law Amendments
1453-1459 Oxford Street East & 648-656 Ayreswood Avenue
City File – OZ-9269; Applicant – Red Maple Properties**

We act on behalf of Fanshawe College (“**Fanshawe**” or “**Client**”) and have been retained to review and comment on the proposed official plan and zoning by-law amendments (the “**Amendments**”) as they relate to the property located at 1453 – 1459 Oxford Street East & 648 – 646 Ayreswood Avenue (the “**Subject Property**”) being proposed by Red Maple Properties.

FANSHAWE COLLEGE

Fanshawe College (“**Fanshawe**”) is a comprehensive college serving the greater London region by providing flexible learning arrangements and experiential education opportunities developed in response to labour market needs. Fanshawe is one of Ontario’s largest colleges - with four campuses in London, Simcoe, St. Thomas and Woodstock - Fanshawe serves close to half a million people with a promise to educate, engage, empower, and excite.

Fanshawe has a significant presence in the City of London with campuses situated throughout the City including its London Campus located at 1001 Fanshawe College Boulevard situated along Oxford Street East, the Fanshawe Aviation Centre located at the London International Airport, and its Centre of Applied Transportation Technologies located at 1764 Oxford Street East. Its downtown locations include the School of Digital and Performing Arts, School of

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Information Technology and School of Tourism, Hospitality and Culinary Arts situated at its Dundas Street location. Also downtown is the Academic Upgrading and Community Employment Services located on Richmond Street. Situated in south London is Fanshawe's London South Campus located on Wellington Road.

Fanshawe's main campus is located at 1001 Fanshawe College Boulevard in the City of London, Province of Ontario (the "**Main Campus**"). The Main Campus provides services to approximately 21,000 full-time students. The Main Campus is a prominent landmark in the City and is situated 15 minutes from downtown and consists of 21 modern buildings set on 100 acres.

The Main Campus provides four on-campus residences that offer accommodations for approximately 1,200 students in traditional apartment-style residence rooms and 400 townhouse-style accommodations. There are significant benefits to Fanshawe and the City for ensuring the viability of its on-campus residences. Such benefits include but are not limited to:

- Clarity of accommodation fees including internet, optional meal plans, and other services required for a successful educational experience;
- Security and safety arrangements including swipe card access systems and campus security;
- An extensive range of facilities and amenities; and,
- College community, living on campus provides students with the opportunity to interact with other students from diverse social and cultural backgrounds.

The development of the Subject Site for 259 residential units in a 24-storey mixed use building within a four (4) minute walk from Fanshawe directly impacts the viability of Fanshawe's on-campus housing. It also creates an intensity of development in the area resulting in additional activity on Fanshawe's campus regardless of whether or not they are students. Due to the proximity of the proposed development to Fanshawe it is foreseeable that the residents of the new 24-storey mixed-use building will utilize Fanshawe's property for a wide variety of services and result in a number of residents crossing Oxford Street East to access public transit from the Main Campus. This also results in Fanshawe students having to wait long for public transit due to the increased number of people accessing public transit in the area.

COMMENTS

We ask that the Planning and Environment Committee ("**PEC**") receive and review these written comments when considering the Proposed Official Plan and Zoning By-law Amendments (the "**Amendments**") for the Subject Property. Fanshawe is submitting these comments for consideration at the public participation meeting scheduled for Monday,

November 22, 2021. We reiterate and rely on our submissions to the City of London (the “City”) on the Proposed Zoning By-law Amendment dated June 14, 2021.

THE SUBJECT PROPERTY

The Subject Property currently consists of detached residential dwellings consistent with the general character of the area. The Amendments seek to provide for the development of a 24-storey mixed use building containing 259 residential units and 500 m² of commercial gross floor area on the Subject Property. It appears that there has been no amendment / alteration to the Amendments following the submission of our Client’s comments to the City.

To accommodate Red Maple Properties’ proposed development on the Subject Property several reductions and modifications are required to the zoning by-law requirements including but not limited to: reductions to the front yard depth, exterior side yard depth, side yard depth, rear yard depth, reduced landscaped open space, increased lot coverage, reduced parking, increased building height and increased maximum density of 390 units per hectare. The Amendments are significant resulting in an increase in the intensity of development and causing considerable impacts to the existing neighbourhood and Fanshawe’s campus.

TRANSIT CORRIDOR AREA

The London bus rapid transit (the “BRT”) system is a proposed transportation network running throughout the City’s busiest corridors. The east-west corridor of the BRT runs west from the downtown area past Wonderland Road and east to Fanshawe’s Main Campus.

The City of London designated Protected Major Transit Areas (“PMTSAs”) to incorporate policies into The London Plan, 2016 to designate PMTSAs and added policies pertaining to building heights and minimum densities for these areas.

PMTSAs are located in the areas surrounding and include the existing and planned higher order transit station or stop, generally within a 500 to 800 metre radius (a 10-minute walk) of the transit station and are generally located in the downtown core. The area along Oxford Street East across from the Main Campus is designated as part of the Transit Corridor Area.

We note that the proposed Transit Corridor station will be located immediately south of Building A of Fanshawe’s Main Campus. The Subject Property is located outside of this area by approximately 300 metres to the east of the proposed Transit Corridor station.

To treat this area similar to a PMTSA is inappropriate and directly contradicts The London Plan policies.

The purpose of the PMTSA, which is consistent with the Provincial Policy Statement, 2020, as encouraging transit supportive development and promoting a clear relationship between land use and transit.

PROPOSED AMENDMENTS

The proposed Amendments result in an increased density and height that is not consistent with the general nature and character of the area. The proposed 24 storey tower is not in-keeping nor does it reflect any other buildings situated in the general neighbourhood in which is situated which is primarily a low-density area. The height and density associated with Red Maple Properties' proposed development results in significant impacts to the Main Campus including but not limited to the services it provides to its student population and is not in keeping with the character of the surrounding area.

MAIN CAMPUS

Fanshawe's Main Campus is intentionally developed in such a manner to ensure that its new five storey building (being one of the highest buildings located on the campus) is situated in the middle of the campus away from and off of Oxford Street East. The buildings located on the Main Campus fronting along Oxford Street East are generally low-rise in character with Building D being the highest building at 3 storeys plus a penthouse level.

For the reasons set out above, the proposed 259 residential units have a significant impact on Fanshawe's residences that are constructed with the specific intention of being integrated into the college and part of the college experience. The size, massing, density, location, and nature of Red Maple Properties' proposed development is tantamount to a student housing proposal.

In addition, the height impacts on the Main Campus are significant resulting in the development of a tower that overpowers the area and the Main Campus entirely. The impact of Red Maple Properties' proposed development on Fanshawe's Main Campus needs to be taken into consideration. Such an intense development is not in-keeping with the character and nature of the surrounding area specifically the Fanshawe Main Campus.

FAILURE TO MEET APPROPRIATE POLICY FRAMEWORK

The proposed development of the Subject Site with the increased density, failure to respect the existing character of the area is inconsistent with the provisions of the *Planning Act* and the Provincial Policy Statement, 2020 including but not limited to:

- A. 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;
 - p. the appropriate location of growth and development; and,
- B. Policy 1.0, of the PPS, Building Strong Healthy Communities, the proposed Zoning By-law Amendment fails to take into consideration the impact of the proposed development on the surrounding land use patterns in the area;
- C. Policy 1.1.1 of the PPS provides that healthy, liveable and safe communities are sustained by:
 - 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*;

The proposed development of the Subject Site with the increased density, failure to respect the existing character of the area does not conform to The London Plan policies including but not limited to Transit Villages and Rapid Transit Corridors.

Fanshawe has significant concerns that Red Maple Properties' proposed development is not in-keeping with the character and nature of the surrounding area specifically the Main Campus. The proposed development is inconsistent with the *Planning Act*, and the Provincial Policy Statement, 2020.

The Zoning By-law Amendment also fails to conform to The London Plan Buildings policies as it relates to the proposed development's scale, massing, materials, relationship to adjacent buildings, and other such form-related consideration, among others.

Our opinion is based on the information submitted to date and we preserve our Client's right to raise any additional issue that may arise upon further review and consideration.

Should you have any questions or concerns, please do not hesitate to contact us.

Yours very truly,

Siskinds LLP

 e-signature

Per:

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