



**Zelinka Priamo Ltd.**

LAND USE PLANNERS

May 5, 2022

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

**Dear Chair and Members of the Planning and Environment Committee**

**RE: Draft Victoria Park Secondary Plan  
556 Wellington Street – Great West Life  
London, Ontario  
Our File: GWL/LON/17-01**

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Zelinka Priamo Limited are planning consultants for Great West Life Realty Advisors ('GWL'), owners of the lands known municipally as 556 Wellington Street (the 'subject lands'), located at the southeast corner of Wolfe Street and Wellington Street, east of Victoria Park. We have been involved in the Victoria Park Secondary Plan ("VPSP") process since the first public information meeting on October 1, 2018, and have engaged City staff in discussions regarding the subject lands. We have also reviewed the Planning Report being presented at the Planning and Environment Committee meeting on May 9, 2022, and have concerns regarding the recommendation and contents of the VPSP.

Overall, the direction of the draft VPSP is positive as it relates to development opportunities on the subject lands. The increase in proposed building heights from previous versions reflects current development permissions as permitted by the Zoning By-law, and the recently approved Site Plan for the subject lands. This draft VPSP allows for a more efficient built form, which could potentially yield additional units, and achieve many of the design principles of the VPSP. However, in reviewing this version of the VPSP, some conflicting design policies on tower setbacks have significant impacts on the development potential for the subject lands, particularly along the southerly property line. The VPSP identifies two key setback requirements for tower portions of high-rise developments: 12.5m from property lines where adjacent properties can accommodate another high-rise

building, and 3.0m from pedestrian connections. In the VPSP the southerly property line meets both these policies in the VPSP. The lands to the south, currently occupied by Centennial Hall, can accommodate additional high-rise development, and the VPSP also identifies the Princess Street extension as a physical connection. Given the subject lands context regarding these differing policies, the impacts are significant as the lesser setback of 3.0m would permit an additional building on the subject lands, whereas the more restrictive 12.5m setback would reduce the ability to place said additional building on the subject lands and reduce the efficiency of the land use. While the Princess Street connection may not be a full width public right-of-way, it could take the form of a public plaza of varying width which would automatically provide a separation distance between development on the subject lands, and any future development on the lands to the south of Princess Street extension. The following figures are conceptual plans of potential development on the subject lands; one reflecting the required 12.5m setback, and one reflecting the 3.0m setback for the high-rise tower portions. Both plans adhere to all other design criteria as provided in the VPSP.

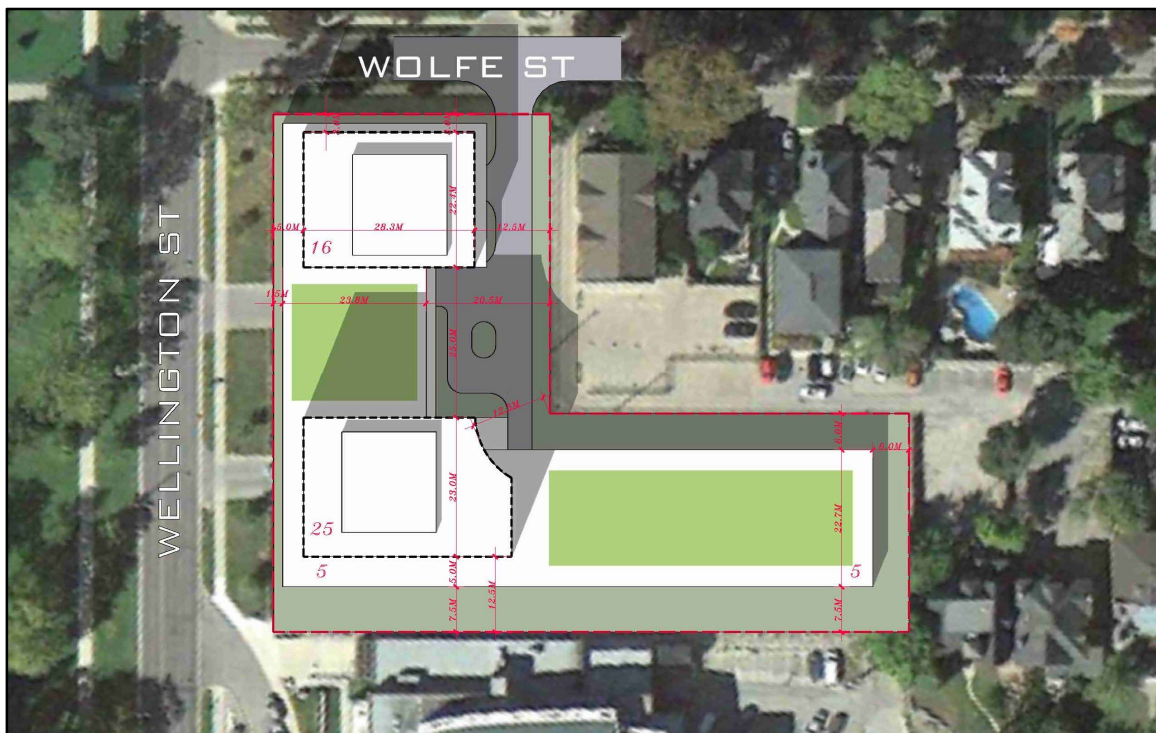


Figure 1: Conceptual Site Plan reflecting Policy 3.8.6vii (12.5m setback from south property line)



**Figure 2: Conceptual Site Plan reflecting Policy 3.8.6vi (3.0m setback from south property line)**

As demonstrated in the figures above the differing policies have significantly different impacts on the development potential of the subject lands. Given the potential impacts, we would like the opportunity to have additional discussions with staff on clarifying the policy direction for setbacks as it relates to the East Policy Area, particularly along the southerly property line of the subject lands.

In addition to the setback policies noted above, we have concerns regarding Section 3.10 of the VPSP, Housing Mix and Affordability. Throughout this section the term 'affordable housing' is used quite often. Over the last number of years, affordable housing has been obtainable through either non-profit housing initiatives, or through Bonus Zoning. The Bonus Zoning option resulted in agreements being entered into with the Housing Development Corporation over the number of units dedicated, the percentage of average market rent, and the length of term the units would be provided for. This would be in exchange for an increase in density and height of a proposed development above and beyond what the Official Plan and Zoning By-law would permit. This approach has been used successfully in several developments within the city. With amendments to

the Planning Act, the ability to use Bonus Zoning to acquire affordable housing will no longer exist beyond September 2022. While the need for affordable housing in the City of London continues, the inclusion of these affordable housing policies in the VPSP are concerning for the following reasons:

- Lack of definition on what qualifies as an affordable housing unit;
- 25% target for the entire Secondary Plan area is vague how it would be implemented on a site-by-site basis; and
- The appropriateness of this policy direction for such a small area, when affordability is a city-wide matter.

Under the current Bonus Zoning approach, it is clear what is and is not an affordable housing unit, as the terms are set through agreements put into place as noted above. The VPSP does not provide clear direction on what is an affordable housing unit, and therefore what would count towards the 25% goal of units within the VPSP area as being affordable is unclear. This leads into the approach to securing the units themselves. The VPSP states that “each site-specific development proposal will be assessed on its ability to contribute to a mix of housing options and supportive amenities”. This policy would suggest some developments may not be able to contribute to the affordable housing cause nor meet the 25% threshold for that development; however, the units from such a development would still be added to the VPSP area. Any shortfall of a single development from contributing affordable housing units to the overall area would result in their required allotment being deferred to other parcels within the area. This could result in developments needing to provide a significant number of affordable housing units to achieve 25% within the entire VPSP area. Moreover, the need for affordable housing is a city-wide need currently, and a policy framework for achieving levels of affordable housing would be better implemented through the London Plan and Place Type policies, rather than a Secondary Plan that only covers a small portion of developable lands. In addition, clarity around what constitutes an affordable housing unit, and how they will be secured needs to be provided in order for there to be a level of certainty within the development industry to bring proposals forward.

We request that the report and draft Secondary Plan be received, and that there be further public consultation to refine some of the policies where ambiguity exists to ensure the design and affordability policies do not unnecessarily constrain development in the East Policy Area and the VPSP as a whole.

Thank you for having regard for our client's concerns. We look forward to continuing our involvement in this City initiative.

Yours very truly,

**ZELINKA PRIAMO LTD.**

A handwritten signature in black ink, appearing to read 'Casey Kulchycki', written in a cursive style.

Casey Kulchycki, BAA, MCIP, RPP  
Senior Planner