



**303 Richmond St., Suite 201  
London, ON N6B 2H8**

June 17, 2022

By email:

Chair Anna Hopkins; Members of City of London Planning and Environment Committee  
City of London  
300 Dufferin Avenue  
PO Box 5035  
London, ON N6A 4L9

Dear Chair Hopkins and Committee Members:

**Re: Official Plan Amendment/Zoning By-law Amendment Applications (OZ-9127)  
84-86 St. George Street and 175-197 Ann Street  
St. George and Ann Block Limited (c/o York Developments)  
City of London File: OZ-9127**

We have reviewed the Planning and Economic Development report ('Planning Staff report') relating to our planning applications for 84-86 St. George Street and 175-197 Ann Street and prepared for the Committee's June 20, 2022 meeting. In this report, City staff address a number of outstanding matters associated with our proposed mixed-use, high-rise development, as identified as part of City Council's referral of our applications back to Civic Administration. As noted in the report, our project team met with City staff to review these matters, which included consideration of recent refinements to our project design.

While it is acknowledged in the Planning Staff report that progress has been made in resolving many of the outstanding issues, City staff recommend that the planning applications be refused. **We respectfully disagree with this recommendation and in response, for the Committee's consideration, we offer the following comments relating to the outstanding matters identified in the Planning Staff report.**

## Review of Outstanding Issues

### **1. Built Form, Buffering and Intensity**

Zedd Architecture has designed the proposed high-rise tower envisioning an iconic building for Central London that provides a high architectural standard and is compatible with the surrounding community. The tower arrangement incorporates a series of five volumes, or rectangles, that vary in height and size. These tower elements and are intended to respond to the local development setting and to reduce the massing impact of the tower elements relative to other towers in the vicinity of our site. **It is important to note that this tower design is not intended to be a typical apartment building similar to others in the local community.** Rather, its crafted form and volume, materials and fenestration and complex program are to bring a new level of sophistication and superior building design to Central London.

#### Design Refinements

As outlined in the Planning Staff report, Zedd Architecture has refined its unique tower design to reduce the height of the nine (9) storey component addressing the St. George Street and Ann Street frontages to a six (6) storey podium. Along St. George Street the six storey block acts as a podium and extends from the south property line to the north property line. In addition, this form is setback from St. George Street over 6.5 m and aligns with the 45 degree view angle required at the corner of St. George and Ann Streets. Please refer to the attached design sheets.

A secondary, or lower, two storey volume cantilevers from the six storey podium (1.9 m setback from the property line) to assist in the stepping affect from the street, to align with the adjacent height of the parking podium and townhouses to the south of the development and to provide a human scale environment along St George Street. This volume does not extend across the entire façade, as it must respect the view angle requirement at the corner. The volume is also designed to allow for the building's sculptural corner element and heritage entrance to the proposed brewery to be viewed. This corner element strengthens the pedestrian environment, while allowing for an open, outdoor seating area in front of the building.

Along Ann Street, both the six storey podium at the corner and the single storey cantilevered volume that houses the game rooms cantilever over the pedestrian walkway (providing weather protection leading to the main building entrance). This again provides a human scale to the Ann Street facade. In addition, there is a high level of glazing and activity at both streetscapes for a more dynamic pedestrian experience. In particular, the heritage entrance and brewery pub adjacent to the gym and fitness rooms are all visible from the pedestrian walkway (putting additional eyes on the street).

The remaining two volumes house the majority of the apartments. The 18 storey thin volume is setback 12 m from St. George Street and 7 m from Ann Street. The tallest 23 storey volume is situated towards the three existing apartment buildings to the eastern side of the site. Collectively, the five forms 'cover' 61% of the site, when areas above the landscaped parking deck and similar open areas are considered. In this respect, a green terrace above the first floor parking deck provides 808 m<sup>2</sup> of open space, which equates to approximately 22% of the site.

## Commentary

We are satisfied that the revised design adequately addresses the adjacent streetscapes and that the building elements collectively support our project vision: to establish a unique, student-oriented development on this site providing residents with an exceptional level of amenities. **In our view, the refined design resolves any outstanding concerns regarding the built form and intensity of this project.**

We have also reviewed the alternative tower design proposal set out in the Planning Staff report and illustrated in Figure 6. In our opinion, the development envelope defined through the associated zoning regulations would result in a conventional block tower design that would not accommodate neither the amenity nor the residential program intended for this project or support a creative design response to our site. It is also our opinion that in terms of pedestrian experience and compatibility, the podium component of our development is far superior to the townhouse arrangement at 180 Mill Street referenced in the report.

In light of these considerations, we do not support the Alternative Zoning By-law Amendment proposed in the Planning Staff report.

### **2. Rail Safety (Crash Wall)**

The City Planning report recommends that a new holding provision 'h-(\_) ' be incorporated into the proposed zoning to address the crash wall design as part of the detailed design process. While we do not oppose this recommendation, the crash wall design will be further reviewed as part of both the City's Site Plan Approval process and City's Building Permit review process, and therefore the proposed holding provision may be redundant.

### **3. Heritage Designation**

As we have previously advised the Committee, we intend to implement key recommendations of the MHBC Heritage Impact Assessment (HIA) by developing a Document Report, Salvage Plan and Interpretation Plan. These plans will establish a detailed process to guide the removal of the building complex associated with the former Kent Brewery and the removal of 175, 179 and 183 Ann Street and 84 and 86 St. George Street. In particular, the Interpretation Plan will explore the incorporation of tangible cultural heritage elements (i.e., salvaged material) and intangible elements (i.e., stories, practices, rituals such as the tradition of brewing and industrial, working-class lifestyle) into the proposed tower.

Following further evaluation and with consideration for comments received through the application review process, we are not proposing to relocate 183 and 197 Ann Street. Rather, heritage conservation efforts will focus on effectively implementing the mitigation measures set out in the HIA.

Additionally, the Committee should be aware that we have submitted a letter of objection to the City's Notice of Intention to Designate 183 and 197 Ann Street. As set out in our letter, dated June 16, 2022, **the proposed heritage designation can be considered as part of the approval and implementation of**

**the ongoing planning approvals.** In this regard, designating the buildings in advance of the consideration of the planning applications unnecessarily complicates the planning process. It is better to bring a designation by-law forward after the Official Plan Amendment and Zoning By-law Amendment applications have been approved. That way the designation by-law can be tailored to the general form of development that has been considered and approved by Council.

Given these considerations, we are not supportive of the Planning Staff report that holding provision (h-41) be applied to the proposed zoning. We are satisfied that the proposed mitigation measures can be adequately reviewed and implemented by way of the City's Site Plan Approval process and set out in the associated Development Agreement. Our proposed Zoning By-law includes a holding provision (h) which requires that we execute a Development Agreement with the City to advance this project.

#### **4. Traffic Mitigation**

As noted in the Planning Staff report, the City's Transportation staff have confirmed that this project would not generate any traffic issues (this matter is resolved).

#### **5. Impacts to Groundwater**

EXP has confirmed the pump testing and data analysis that should be carried prior to construction to help design the construction dewatering system for the project and to support the associated Permit to Take Water application (submitted to the Ministry of the Environment, Conservation and Parks). The Planning Staff report recommends that a holding provision (h-183) be added to a proposed Zoning By-law Amendment requiring City staff review of this hydrological study. While we question the need to have City staff review this hydrogeological assessment as Ministry approval is required, we have no objection to this proposed holding provision.

#### **6. Convenience Commercial Uses**

As we have previously advised the Committee, a key element of our project vision is the **craft brewery** planned for the corner of St. George Street and Ann Street within the tower podium. This small-scale brewery is proposed to be operated by 4EST Brewery, a London-based company, and would include a tasting room open to the community. In addition to supporting a local industry, **operating a craft brewery at this location would provide a historic connection to the Kent Brewery**, which operated at 197 Ann Street during the late-19th and early-20th century.

Also, as we have previously advised the Committee:

- Several commemorative interpretative panels and installations would be placed within the brewery layout to commemorate and respect the historical value of the properties located on the project site.
- Bricks salvaged from existing buildings on-site would be used to create partition walls within the new brewery as well as architectural elements associated with the Kent Brewery, including its Florentine arches.

Given the overall value of the proposed brewery to this development, we are seeking limited permissions for a commercial use within the tower podium as part of our proposed amendments.

## **7. Bonus Zone**

We are satisfied with the Bonus Zone requirements set out in the Committee's April 25, 2022 resolution. The language of that Bonus Zone is included in our proposed Zoning By-law Amendment, which also sets out the development regulations needed to implement the current project design.

### **Alternative Recommendation**

In light of these considerations, **we request that the Planning and Environment Committee support our applications and endorse a recommendation for approval to City Council.** As such, we have enclosed a draft recommendation of approval for the applications to amend the City's Official Plan (The London Plan) and its Zoning By-law, noting that draft amendments supporting are project design are included in the Planning Staff report. We also note that additional holding provisions may need to be included in the draft Zoning By-law Amendment to address rail safety and hydrogeological issues.

Please note that I will address key matters noted in this submission as part of my presentation to the Committee at the June 20<sup>th</sup> public meeting.

Our team is available to assist in any way to address any questions you may have regarding the matters discussed. I may be contacted at 519-640-8968.

Respectfully submitted,



Ali Soufan  
President, York Developments

Cc: S. Wise, H. Lysinksi; City of London  
Mayor E. Holder, Council Members; City of London

Enclosure:

1. Draft Council Recommendation.
2. Additional project renderings (Zedd Architecture)

## Recommendation

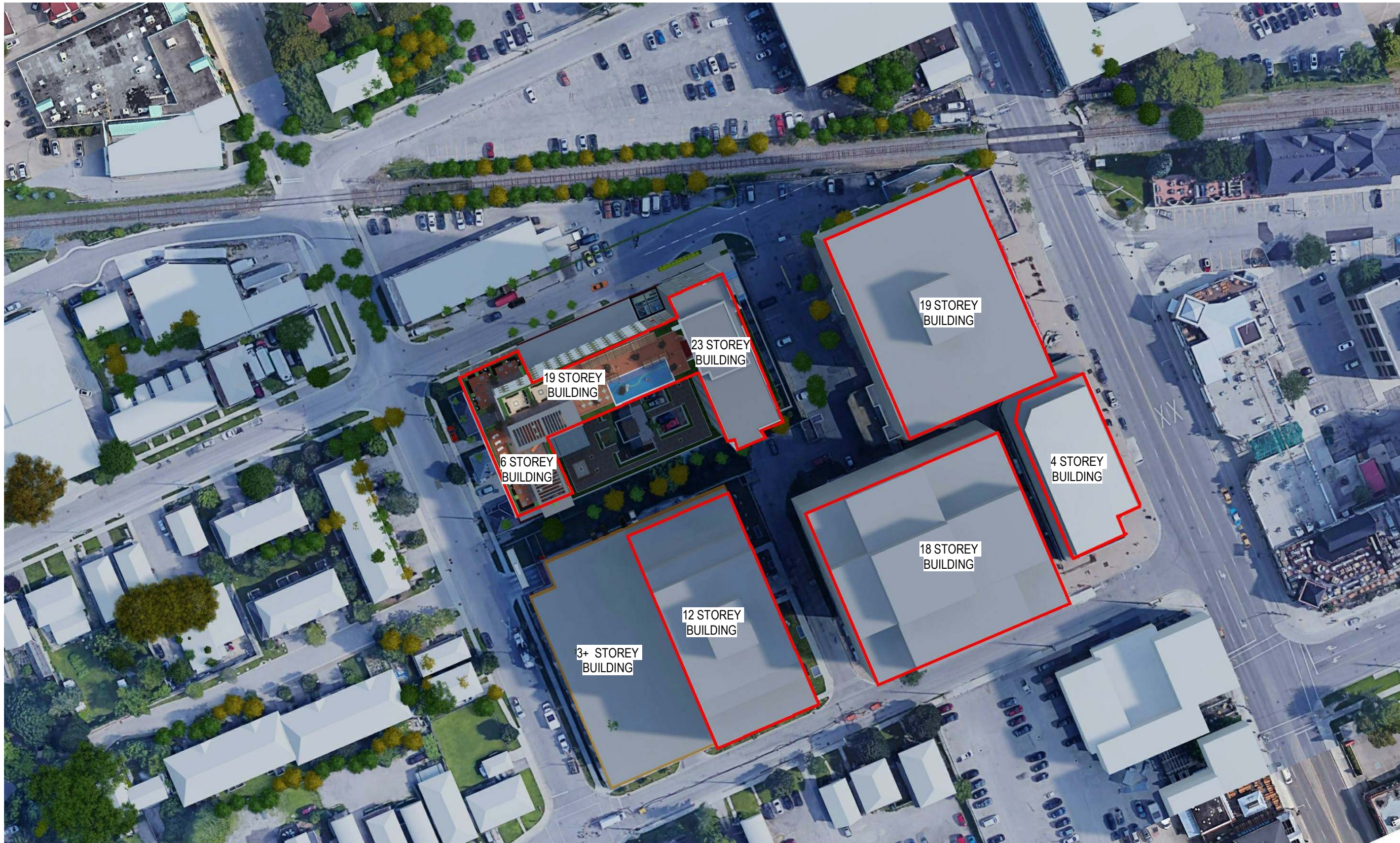
That the following actions be taken with respect to the application of St. George and Ann Block Limited, relating to the property located at 84-86 St. George Street and 175-197 Ann Street:

- (a) The proposed by-law attached hereto as Appendix "B" **BE INTRODUCED** at the Municipal Council meeting on May 3, 2022 to amend The London Plan by **REPLACING** Policy 1038C to permit an intensive, mixed-use development having a maximum building height of 23 storeys, exclusive of the mechanical penthouse, and a maximum floor area of 500 m<sup>2</sup> for retail, service and office uses with the podium base, and by **ADDING** the subject lands to Map 7 – Specific Area Policies - of The London Plan;
- (b) The proposed by-law attached hereto as Appendix "C" **BE INTRODUCED** at the Municipal Council meeting on May 3, 2022 to amend Zoning By-law No. Z.-1, in conformity with the Official Plan as amended in part (a) above, to change the zoning of the subject property **FROM** a Residential R9 (R9-3\* H12) Zone **TO** a holding Residential R10/Convenience Commercial Special Provision/Bonus (h\*R10-5/CC4( )\*B-( )) Zone;

The Bonus Zone shall be implemented through one or more agreements to facilitate development of a high quality, mixed-use apartment building with a maximum density of 603 units per hectare and a maximum height of 84 metres, which substantively implements the Site Plan and Elevations attached as Schedule "1" to the amending by-law and in return for the facilities, services and matters set out in the amending by-law.

- (c) Development Services Staff **BE DIRECTED** to make the necessary revisions to the Official Plan Amendment and Zoning By-law Amendment documents in advance of the Municipal Council meeting on July 5, 2022, in consultation with the Applicant.





ZEDD ARCHITECTURE INCLUDES THIS DRAWING, THE COPYRIGHT AND OWNERSHIP OF THE DESIGN, AND ALL INSTRUMENTS OF SERVICE AS EXCLUSIVE PROPERTY AND MAY NOT BE USED FOR ANY OTHER PROJECT, SOLD OR BE OFFERED FOR SALE (OR AS PART OF A SALE OF PROPERTY) WITHOUT THE WRITTEN CONSENT OF ZEDD ARCHITECTURE INC.

Scale :

18-032

High-Rise Residence

Ann Street - London, ON

Overall Site View

03/21/19

X008

**zedd**  
ARCHITECTURE

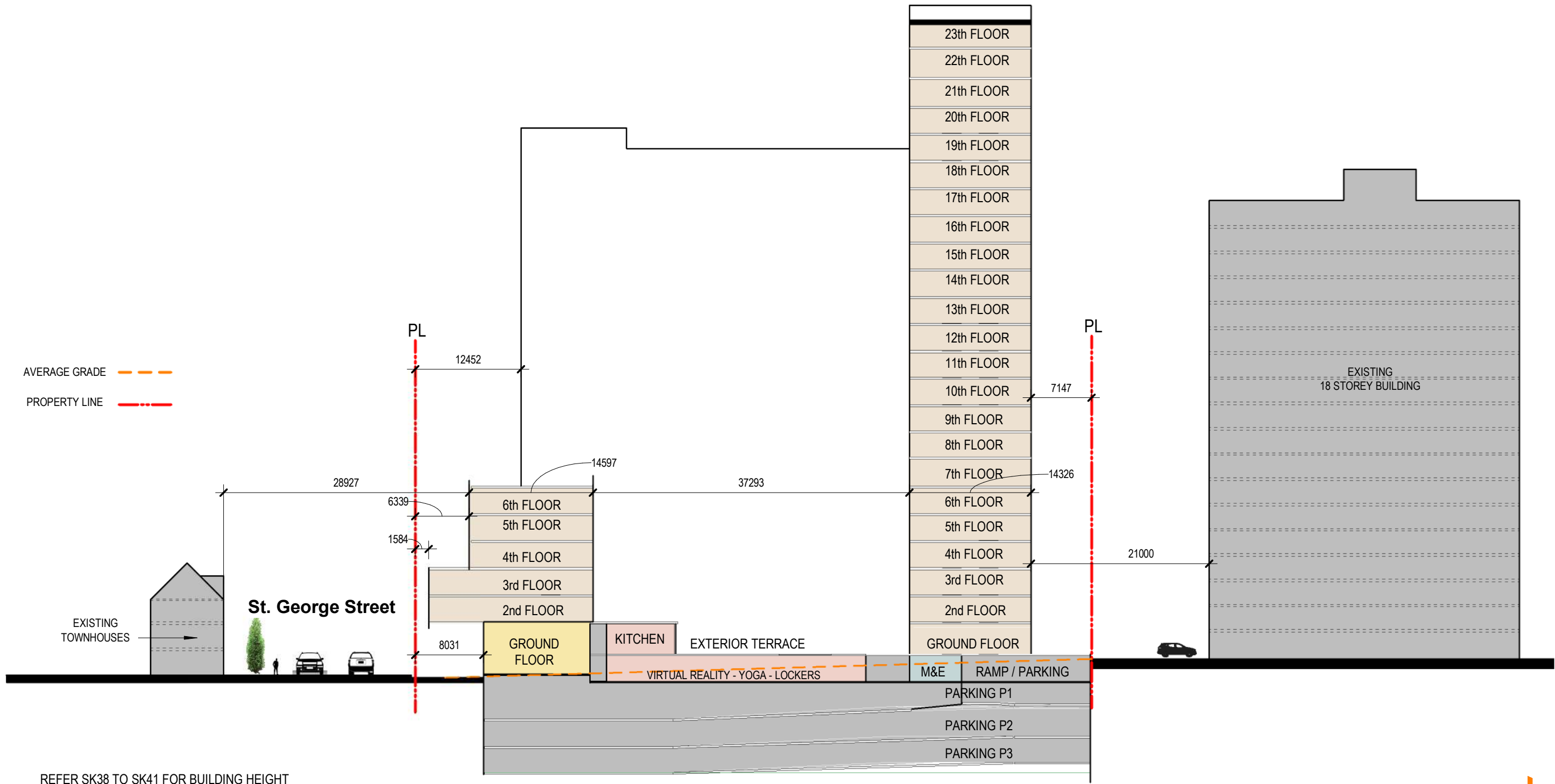
363 horton street east london ontario N6B 1L6 519 518 9333  
www.zeddarchitecture.com info@zeddarchitecture.com

2022-05-18 3:43:43 PM

File: C:\Users\rsantos.DOMAIN\Documents\Revit Local\18-032 - Anne Street Student Housing-Central File\_Revised\_rsantosSSWQX.rvt



ZEDD ARCHITECTURE INCLUDES THIS DRAWING, THE COPYRIGHT AND OWNERSHIP OF THE DESIGN, AND ALL INSTRUMENTS OF SERVICE AS EXCLUSIVE PROPERTY AND MAY NOT BE USED FOR ANY OTHER PROJECT, SOLD OR BE OFFERED FOR SALE (OR AS PART OF A SALE OF PROPERTY) WITHOUT THE WRITTEN CONSENT OF ZEDD ARCHITECTURE INC.



REFER SK38 TO SK41 FOR BUILDING HEIGHT

Scale : 1" = 40'-0"

18-032 High-Rise Residence

Ann Street - London, ON

East - West Spatial Separation

10/27/20

X006

**zedd**  
ARCHITECTURE

363 horton street east london ontario N6B 1L6 519 518 9333  
www.zeddarchitecture.com info@zeddarchitecture.com



ZEDD ARCHITECTURE INCLUDES THIS DRAWING, THE COPYRIGHT, AND OWNERSHIP OF THE DESIGN, AND ALL INSTRUMENTS OF SERVICE AS EXCLUSIVE PROPERTY AND MAY NOT BE USED FOR ANY OTHER PROJECT, SOLD OR BE OFFERED FOR SALE (OR AS PART OF A SALE OF PROPERTY) WITHOUT THE WRITTEN CONSENT OF ZEDD ARCHITECTURE INC.

Scale :

18-032

High-Rise Residence

Ann Street - London, ON

N & W Rendered Elevations

10/27/20

X007

zedd

ARCHITECTURE

363 horton street east london ontario N6B 1L6 519 518 9333  
www.zeddarchitecture.com info@zeddarchitecture.com



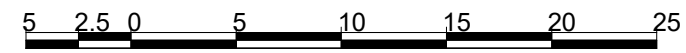
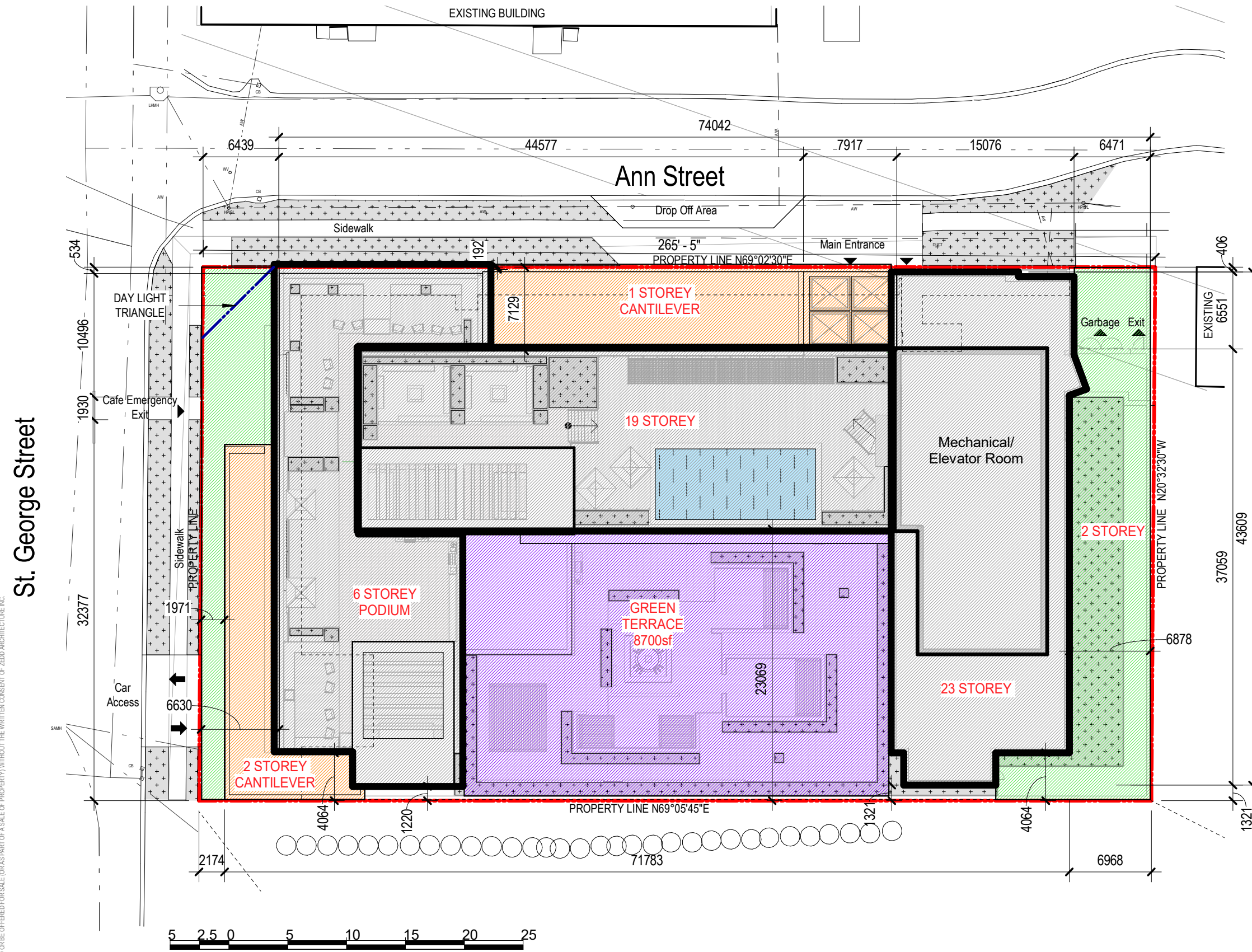
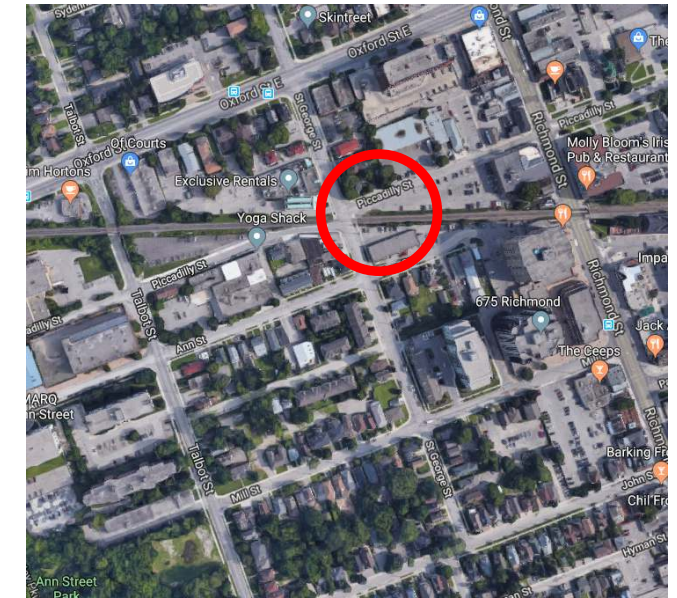
WEST ELEVATION



NORTH ELEVATION



# Key Map



SITE STATISTICS		
Address: 175 ANN STREET - Proposed Zoning: R10(R10-5)		
ZONING	REQ'D	PROPOSED
USE:	Apartment Building	Apartment Building / Restaurant Use
SITE (LOT) AREA:(min.)	1000m <sup>2</sup>	3,667.57m <sup>2</sup>
LOT FRONTAGE (min.)	30 m	45.26 m
REAR YARD (min.)	37.2m	0 m
FRONT YARD (min.)	15 m	0 m
INTERIOR YARD (min.)	37.2m	0 m
EXTERIOR YARD (min.)	15 m	0 m
LANDSCAPE, OPEN SPACE (min.)	30%	0% - 2,315m <sup>2</sup> (Roof Terraces@ 2nd, 10th & 20th), & Pool)
LOT COVERAGE (max.)	50%	94.6%
HEIGHT (m)	n/a	**73.21m from average grade
OFF-STREET PARKING	214*	189 & 15 Tandem
DENSITY (max.)	350 UNIT/ Ha	583 UNIT/ Ha
BICYCLE PARKING	0.75 PER UNIT = 206	206 (MIN)

\*Parking Calculation - 1 / unit (214) Not Including Restaurant (Internal Use) = 214 Total  
 \*\*Tower 1 = 32.26m, Tower 2 = 64.26m, Tower 3 = 73.21m

ZEDD ARCHITECTURE INC. HAS THE DRAWING, THE COPYRIGHT AND OWNERSHIP OF THE DESIGN AND ALL INSTRUMENTS OF SERVICE AS EXCLUSIVE PROPERTY AND MAY NOT BE USED FOR ANY OTHER PROJECT, SOLD OR BE OFFERED FOR SALE OR AS PART OF A SALE OF PROPERTY WITHOUT THE WRITTEN CONSENT OF ZEDD ARCHITECTURE INC.

Scale : As indicated

18-032 High-Rise Residence

Ann Street - London, ON

Site Plan

03/21/19

X009



ZEDD ARCHITECTURE INCLUDES THIS DRAWING, THE COPYRIGHT AND OWNERSHIP OF THE DESIGN, AND ALL INSTRUMENTS OF SERVICE AS EXCLUSIVE PROPERTY AND MAY NOT BE USED FOR ANY OTHER PROJECT, SOLD OR BE OFFERED FOR SALE (OR AS PART OF A SALE OF PROPERTY) WITHOUT THE WRITTEN CONSENT OF ZEDD ARCHITECTURE INC.

Scale : 1/4" = 1'-0"

18-032

High-Rise Residence

Ann Street - London, ON

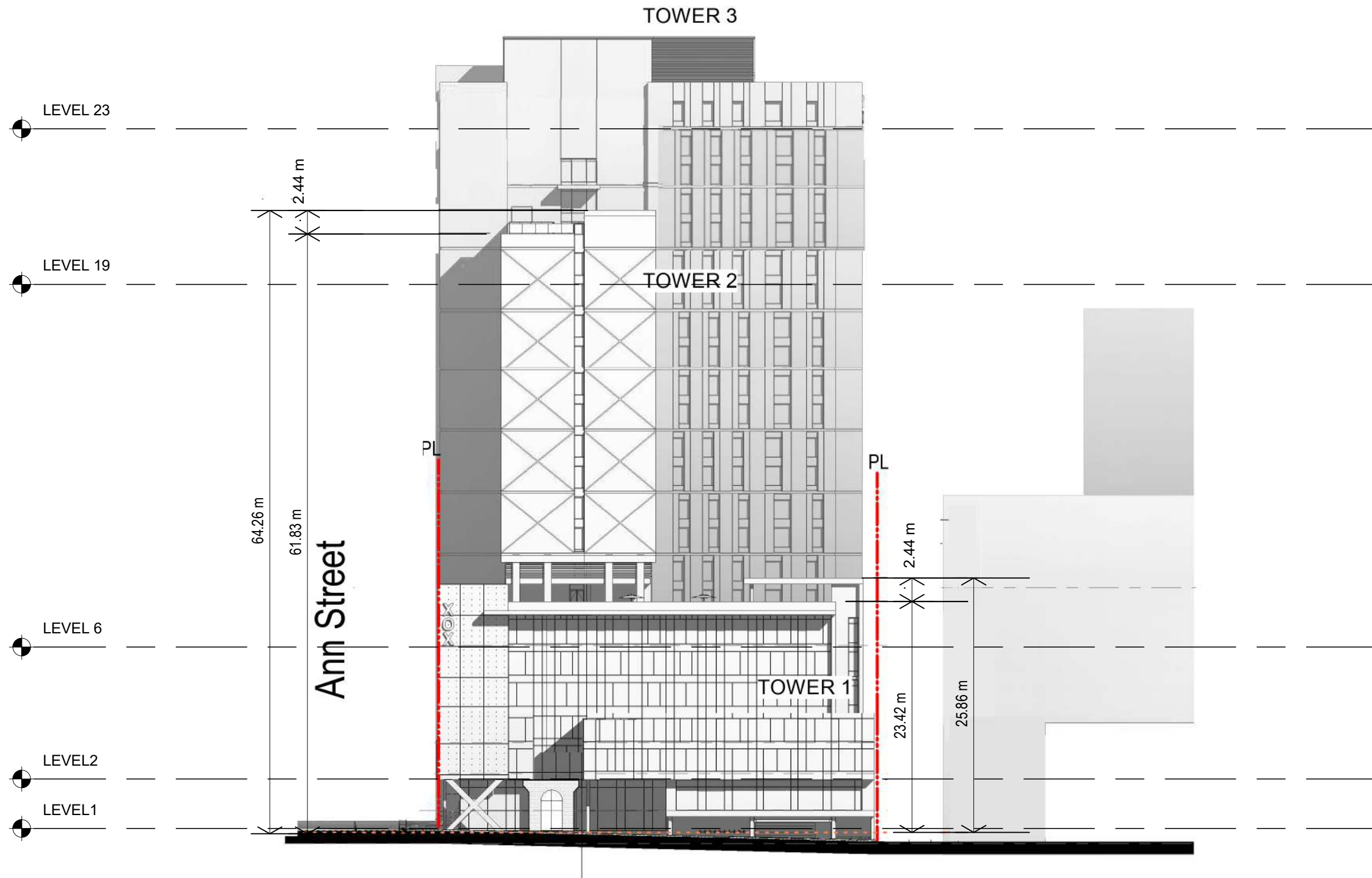
West Elevation

03/21/19

X013

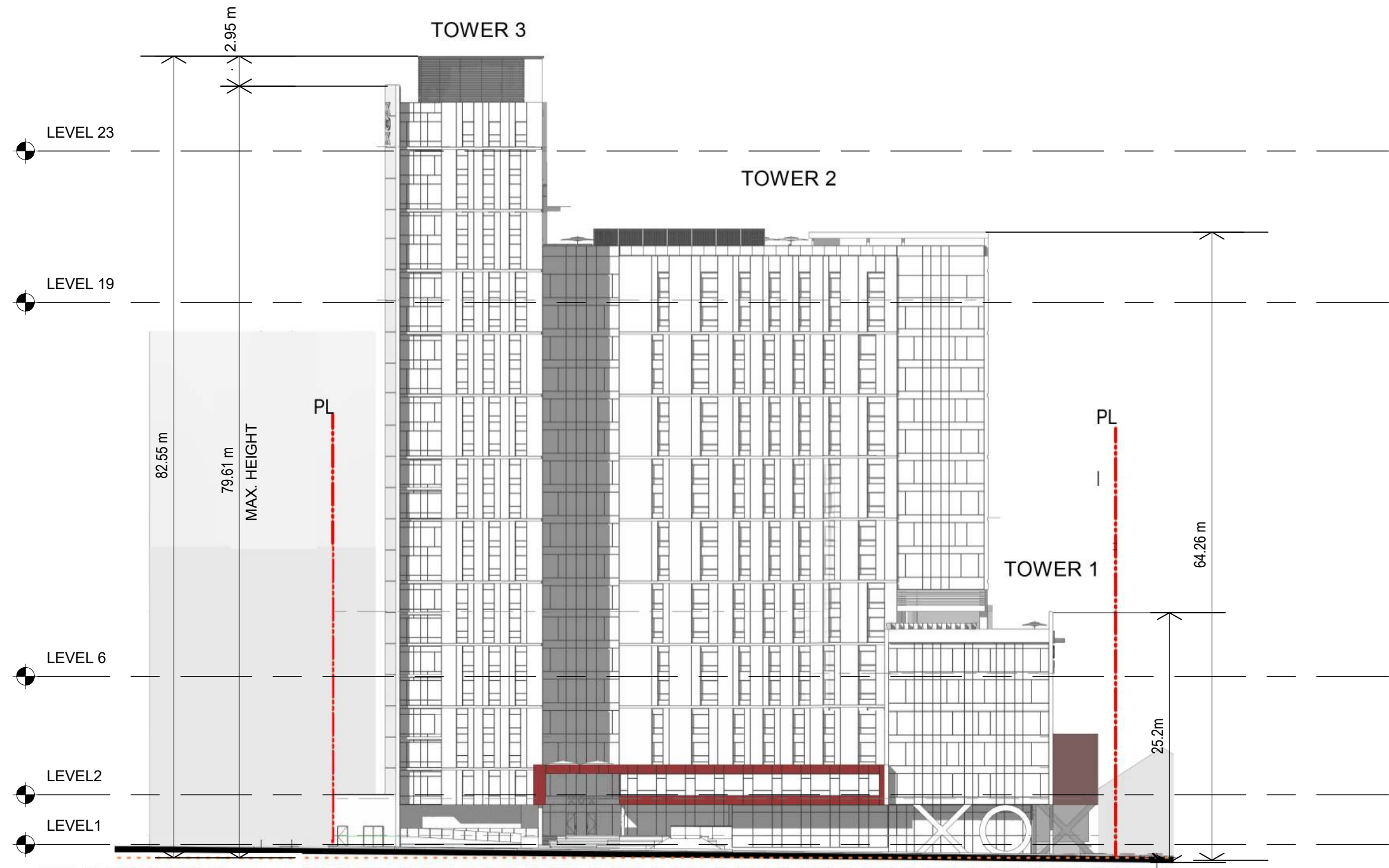
zedd  
ARCHITECTURE

363 horton street east london ontario N6B 1L6 519 518 9333  
www.zeddarchitecture.com info@zeddarchitecture.com





ZEDD ARCHITECTURE INCLUDES THIS DRAWING, THE COPYRIGHT AND OWNERSHIP OF THE DESIGN, AND ALL INSTRUMENTS OF SERVICE AS EXCLUSIVE PROPERTY AND MAY NOT BE USED FOR ANY OTHER PROJECT, SOLD OR BE OFFERED FOR SALE (OR AS PART OF A SALE OF PROPERTY) WITHOUT THE WRITTEN CONSENT OF ZEDD ARCHITECTURE INC.



Scale : 1/4" = 1'-0"

18-032

High-Rise Residence

Ann Street - London, ON

North Elevation

03/21/19

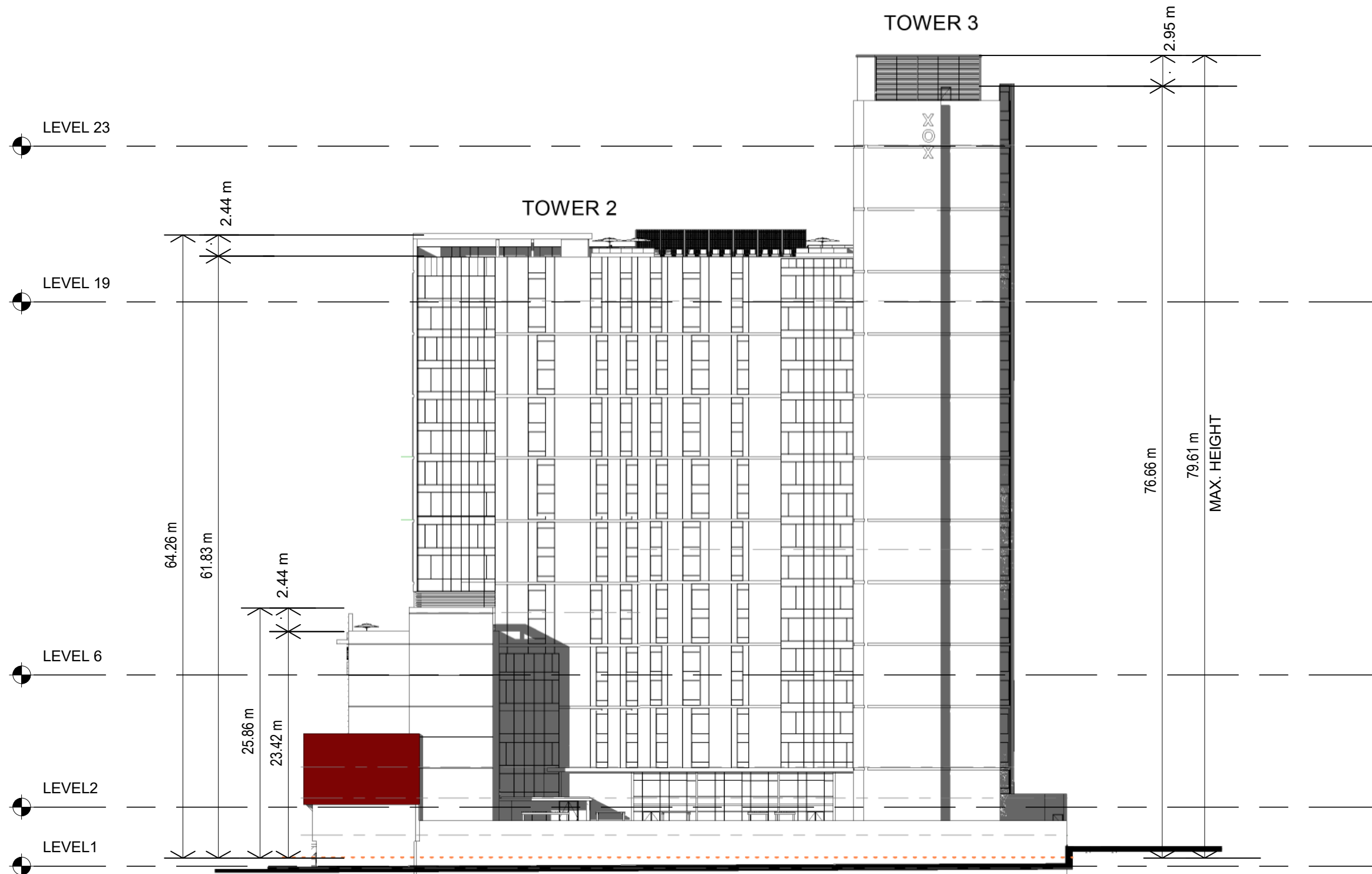
X010

zedd  
ARCHITECTURE

363 horton street east london ontario N6B 1L6 519 518 9333  
www.zeddarchitecture.com info@zeddarchitecture.com

2022-05-18 3:43:47 PM

File: C:\Users\rsantos.DOMAIN\Documents\Revit Local\18-032 - Anne Street Student Housing-Central File\_Revised\_rsantosSSWQX.rvt



ZEDD ARCHITECTURE INCLUDES THIS DRAWING, THE COPYRIGHT, AND OWNERSHIP OF THE DESIGN, AND ALL INSTRUMENTS OF SERVICE AS EXCLUSIVE PROPERTY AND MAY NOT BE USED FOR ANY OTHER PROJECT, SOLD OR BE OFFERED FOR SALE (OR AS PART OF A SALE OF PROPERTY) WITHOUT THE WRITTEN CONSENT OF ZEDD ARCHITECTURE INC.

Scale : 1/4" = 1'-0"

18-032 High-Rise Residence

Ann Street - London, ON

South Elevation

03/21/19

X011

**zedd**  
ARCHITECTURE

363 horton street east london ontario N6B 1L6 519 518 9333  
www.zeddarchitecture.com info@zeddarchitecture.com

ZEDD ARCHITECTURE INCLUDES THIS DRAWING, THE COPYRIGHT AND OWNERSHIP OF THE DESIGN, AND ALL INSTRUMENTS OF SERVICE AS EXCLUSIVE PROPERTY AND MAY NOT BE USED FOR ANY OTHER PROJECT, SOLD OR BE OFFERED FOR SALE (OR AS PART OF A SALE OF PROPERTY) WITHOUT THE WRITTEN CONSENT OF ZEDD ARCHITECTURE INC.

Scale : 1/4" = 1'-0"



18-032 High-Rise Residence

Ann Street - London, ON

East Elevation

03/21/19

X012

**zedd**  
**ARCHITECTURE**  
 363 horton street east london ontario N6B 1L6 519 518 9333  
 www.zeddarchitecture.com info@zeddarchitecture.com