

**From:** AM Valastro

**Sent:** Friday, June 17, 2022 1:49 AM

**To:** PEC <pec@london.ca>

**Subject:** [EXTERNAL] Fwd: File: Z-9367: 599-601 Richmond Street

Please place on the added agenda with consent.

Thank You

AnnaMaria

File: Z-9367: 599-601 Richmond Street

Dear Members of Council,

It is important to Appeal this file because the staff report cherry picks its policies in support of the development and ignores other aspects of the same policies which would not support it. And never are policies such as the Climate Action Plan or the Urban Forest Strategy referenced even though adopted in the London Plan.

**What is not supported:**

This development is not Downtown. It is located on a residential street.

It is a mixed use development but primarily a residential building, on a residential street that abuts a residential neighbourhood and the Urban Design requirements that encourage no setbacks to do apply here. The 1989 Plan is clear. This development requires setbacks and streetscapes that conform to the neighbourhood 'texture'. The Near Campus Neighbourhood Policy is the overarching policy applicable on this site and that policy takes precedence. This policy carries over the same requirements from the 1989 Official Plan.

This trend to waiver all setbacks and build to the outer boundaries seems to be unique to the broader old city area. If the same building was to be built on Fanshawe Park Rd. there would be setbacks despite having a commercial main floor. There is really no rhyme or reason why this building cannot have setbacks. It is a choice not to have setbacks but not because the policy supports it. The policy does not permit it and the density requested is double what is permitted.

It is important to ask the question whether a building design that ignores the neighbourhood texture, looks like all the other buildings being proposed in this city and gives only two (2) affordable housing units is worth **a doubling of density per hectare** in a space that is only three (3) cars lengths wide. It is so tight that the building had to be moved back slightly so the doors don't open onto the sidewalk. Really?

This approach has had serious consequences over the long term because it literally removes outdoor 'ground' green space and as approvals are site by site, there is no assessment of the long term accumulative impacts of such a policy.

In conjunction with the London Hydro **generic** 'zone' tree planting guidelines in which no shade trees are permitted in the old city area because of hydro lines, the only place to plant shade trees is on private property and the current trend is to eliminate all private open space and build to the boundaries.

This is achieved by waiving all property setback zoning requirements.

Setbacks are a protective zoning requirement. It protects space between buildings to ensure privacy, safety, air circulation, cooling heat radiating from building and greenspace and this in turn protects residents.

**Setbacks are a protective policy.**

That's the purpose of a setback and by waiving setbacks in new development results in no open land for shade trees anywhere in the old city area. You want people to walk? They are not going to walk blocks in the sweltering heat and hot sun without protective shade trees. And while staff reports always reference the 'big' policies such as Provincial Policy Statement and the London Plan, rarely do they reference the policies within the London Plan which are policies too such as the Urban Forest Strategy and the Climate Action Plan Strategy. These strategies will only work if applied broadly and to all development plans.

For example:

**9th Meeting of the Trees and Forests Advisory Committee**

**November 24, 2021, 12:15 PM**

- 1. On-going Loss of Street Tree Planting Spaces** The city is running out of vacant sites for trees on existing streets. Street trees are very important as they define community character. In addition to all their environmental benefits, street trees provide shade to pedestrians and can extend the lifespan of the asphalt roads. The city has planted most of the planting spaces identified through a recently completed tree inventory. In the process of creating annual planting plans, the city notifies residents via letter of the upcoming tree planting. Residents have the option to “opt out” and reject a street tree outside their home, even if one was there before. Over the past few years, this trend is increasing to as much as a 20% of the total tree planting numbers annually and has a cumulative impact. Private Land Approximately, 90% of tree planting opportunities are located on private lands. Encouraging tree planting on private land has the greatest impact to affect tree canopy cover goals.

**Applying the Same Policy Differently Across the City**

This policy of infill targets 'dilapidated' (direct quote from the 1989 Official Plan) buildings which tend to be low income older neighbourhoods. Protective setback zoning is not waived for new development in other areas within the city. You may cringe at the suggestion that these policies are applied differently depending on who lives where, but it is seen as taking advantage of inner cities and low income neighbourhoods because there is no reason why this site cannot house a building that fits and offers green space to its residents and contributes to the Urban Forestry Strategy and the Climate Change Action Plan. The Urban Design guidelines are intended to apply to commercial streetscapes. They are discriminatory if applied to new residential development differently depending on the neighbourhood where people live. Again, this development is on a residential street and any commercial business on this street is in a heritage house. The staff report ignores this fact and instead relies on the address which is Richmond St. but the building is behind the commercial strip.

More and more people will be living in highrises permanently and will not choose or cannot choose to live in single family homes or the like. Therefore, these new developments need to accommodate

families as well as others. Again, this building is being marketed to people without children and segregates populations within the city. The same qualities, green space or 'grounds' and play area should also apply to all new highrise development and must be family friendly. Ground green amenity space is essential so residents can take their dogs out, children can play and sit under canopy (shade) trees for relief from the heat and have some privacy.

It is broadly acknowledged that children in highrises with no immediate play area, use the corridors for play space and are more prone to depression.

If Council will not acknowledge the full slate of policies, including people zoning, then this file must be appealed.

Sincerely,

AnnaMaria Valastro