MEMORIAL UNIVERSITY

Office of the Vice-President (Administration & Finance)

St. John's, NL Canada A1C 5S7
Tel: 709 864 8217 Fax: 709 864 8028 www.mun.ca

August 6, 2021

To Whom It May Concern:

Please accept the revised submission from Memorial University based on documents made available in recent weeks in advance of public consultations. The information below is being submitted on behalf of Memorial University in response to the ***6 Lambe's Lane development by Werkliv, for three Apartment Buildings with a total of 205 units.***

Memorial has identified several areas of concern regarding potential impacts of the proposal on the university which are not currently addressed in documents available from the City of St. Johns. Namely:

a) **Traffic in the area:** Westerland Road is a busy roadway with an existing high volume of pedestrian traffic. In the past several years, upgrades to the roadway for pedestrian safety have been undertaken. However, further roadway upgrades to Westerland Road may be required to accommodate increased traffic and increased pedestrian safety.

b) **Access to Alumni House:** The document outlines roadway changes that may cause confusion or reduced/constricted flow of traffic to the Alumni House (also located on Lambe's Lane). This includes the road turning into a circle in front of the development, then continuing on to the Alumni House.

   Memorial would like confirmation if access to the Alumni House building will be altered or impacted during the construction process or indefinitely post-construction.

c) **Parking:** The June 2020 City Decision/Direction Note indicates "This application is unique in that the applicant is requesting parking relief for all parking requirements." In addition, it is indicated ". . . significant amount of publicly available parking spaces within a seven-minute walk of the proposed development. Some offer monthly rental rates to the public. MUN also has on-campus parking spots that are not pictured that serve faculty staff and students on a first come first serve basis."

   These points raise concerns for Memorial, as it is believed that the demand for parking is drastically underestimated. Memorial's student housing provides some parking for students, yet the demand from this group consistently exceeds supply. Memorial is concerned that parking demand from residents, visitors, service persons, etc., of the new development will face the same issue. This will result in individuals illegally parking in the nearby Memorial facilities. These facilities are already under considerable strain, and illegal

parking would impact nearby employees, paying customers of the Aquarena, students, and others frequenting the university. This will also increase demand for parking enforcement by Memorial and/or investment in alternate measures such as parking gates to ensure parking is available for students/staff/faculty, clients/customers, donors, alumni, volunteers, and similar.

Memorial has been actively working with the City of St. John's and other levels of Government to develop approaches designed to reduce the volume of traffic and parking congestion in the area of the university for several years. Some options that have been reviewed include park and ride arrangements, increased participation in public transit by way of a universal student pass program, improved bus terminal facilities on campus, etc. A project considering high density residential applications is anticipated to further compound existing parking and traffic concerns.

In consideration that the required new zoning is for residential purposes, it is anticipated that illegal parking will extend to overnight. This will impact parking lot servicing, snow clearing, etc., that is done outside normal business hours.

d) Emergency access: Memorial has concerns with additional access and flow relating to the query in the proposal to "Indicate if access can be provided to the Aquarena parking lot such that emergency access can be improved." The Werkliv project also contains minimal information on emergency access, and Memorial requests more information on this item.

e) Snow clearing: Consideration is required on the planned snow clearing operations of the property to ensure no snow dumping or access issues on Memorial's property or impacts to the Aquarena. Additionally, if access is expected to the property from the Aquarena, this will impact snow clearing operations for the university and illegal parking will impact the university's ability to keep its lots cleared. More information is required.

f) Lambe's Lane road condition: Lambe's Lane roadway is narrow and currently in a state of disrepair with no sidewalks. Upgrades and expansion of the area would be required to accommodate the increased two-way vehicular traffic flow, pedestrians, and bike traffic.

The university has received complaints regarding the condition of the road along with safety concerns for pedestrians and vehicles alike due to the narrow roadway and limited sightlines. This roadway serves as a regular pedestrian route for students, staff and faculty of Memorial, and students of Prince of Wales Collegiate. The current documents do not demonstrate how, or if, a high density residential project will mitigate the risks to the high pedestrian traffic resulting from the increase in vehicular traffic frequenting the site (taxis, deliveries, support services such as trades for building repairs/snow clearing/grounds maintenance/garbage collection, residents, visitors, etc.).

Given the tight proximity of neighboring facilities (St. Augustine's Church, Aquarena, Alumni House), options to improve sightlines/traffic flow are very limited.

g) Expropriation: Memorial requires confirmation if any of its land is required and will be expropriated to complete the required facilities upgrades.

h) Bus stop: Additional public transportation upgrades may be needed to accommodate the increased use for Metrobus services in the area (i.e., shelter).

i) **Proposed development ingress/egress:** Additional consideration needs to be given to the ingress/egress of the building and the impact on Memorial's nearby facilities.

j) **Impact on business model:** Aside from the numerous operational and logistical considerations outlined herein, Memorial also has concerns about the impact on Memorial-owned residences. In particular, the potential impact to Memorial's own housing facilities, including lost revenue and competition by a for-profit private business. As you are aware, Memorial's residences were built and operated with tax payer support and as a not-for-profit, we strive to offer reasonably priced, high-quality accommodations to students at cost recovery for annual operations. A development of 205 units (and currently unknown total inhabitants) may impact Memorial's ability to maintain its current business model.

k) **Impact on brand and reputation:** Beyond simply providing a place to live, Memorial provides a high level of proactive safety, emergency and wellness services, and support from trained residence and student life teams, and Campus Enforcement and Patrol staff available 24 hours a day, 7 days a day week. Students, their families, and the public may not distinguish between Memorial-run residences and this development, and may have an expectation that similar services are provided to all students regardless of who the landlord may be. The fact remains that *Werkliv's* tenants will largely be Memorial students not governed by the same rules or provided with the same student supports as on-campus residents. This may negatively impact Memorial's brand and reputation, which should not be underestimated.

l) **Potential noise concerns for neighboring Alumni House.** High density residential is bound to bring noise. Everyday living for residents will result in noise that may potentially interrupt business operations within the neighboring Alumni House.

Thank you in advance for your consideration of these potential issues.

Sincerely,



Kent Decker

WerkLiv

4-1484 Carlton St., Halifax, Nova Scotia B3H 3B7

August 10, 2021

Dear Mr. Kent Decker,

This letter is in response to the written concerns around the 6 Lambe's lane development proposal (dated August 6 2021), of which we acknowledge receipt.

Thank you for bringing concerns to our attention. We take every one of these very seriously. Over the past year and a half, we have been working with the city in preparation of this Land Use Assessment Report (LUAR). Many of the concerns outlined below have been explored in depth in that document, which is available for public viewing through the city of St. John's website, however I have responded specifically to some of your concerns below. I hope we can continue this discussion in person this fall.

Our intention is to make this project a benefit to students, but also to the surrounding area. Please take a minute to review these responses and feel free to send any additional concerns our way. We are open and eager to have collaborative and constructive conversations.

a) Traffic in the area: We believe that adding sidewalks to the current dirt road will help navigate pedestrian traffic the right direction. The reduction of car parking should keep the vehicular traffic the same or similar and 2 lanes will help with circulation of existing cars. There will be a loading zone off the road for deliveries and 4 parking spots on the left for accessible vehicles and other pick ups.

b) Access to Alumni House: There will be major improvements to the existing road. It will be paved and able to accommodate two-way traffic. The connection to the Alumni House will not be affected. The Alumni House will benefit from the road upgrades in several ways including having pedestrian-designated sidewalks instead of what is currently a 1-way gravel road used to enter the Alumni House parking lot. As for during the construction period, we will be developing a construction management plan to address any circulation issues and ensure access to the Alumni House is clear. Note that this step will come if/when the project is accepted. We are happy to discuss this in greater detail, if necessary.

c) Parking:

We acknowledge your valid concerns and realize that MUNL has had to mitigate parking issues over the past few years. We have reviewed this situation in great detail and believe that an underlying issue with parking is a result of a lack of housing options in close proximity to campus. This has increased the need

for students to own and use their car to commute to university and resulted in a higher demand for parking spots.

We believe the Aquarena likely faces similar issues, as a result of out of area students driving in to attend class and not having a designated parking spot or permit to park.

While this project will not increase enrollment numbers, it will eliminate the need for many students to drive long distances to attend class.

Adding parking will only address the surface issue and not the real problem, which we believe can be resolved by increasing adequate housing close to campus.

d) Emergency access: The proposed development has considered all emergency vehicles and circulation in great depth over the last year and a half. The LUAR submission was delayed to specifically address these items in the design, in consultation with the Engineering and Traffic Departments at the city. We will be happy to give you more information once we are past this preliminary stage.

Currently, Lambe's Lane is a one-way dirt road and the Alumni House uses this to access its parking spots. We believe this is an unsafe practice for pedestrians and drivers. Our proposal upgrades Lambe's Lane to a 2-way road with pedestrian sidewalks on both sides. The building is fully sprinklered and a new fire hydrant will be installed in the area, ensuring top safety features. Additionally, the turning circle was included so emergency vehicles have clear and direct access. Any additional changes can be reviewed when civil drawings begin. Planning and Fire Code Engineers with the City of St. John's have thoroughly reviewed this project and have recommended changes that are reflected in the current design. At this juncture, we are looking for public approval for the development and we will continue to make efficiencies and improvements as this project moves forward.

e) Snow clearing: We have discussed this in great detail with the city and the need to plan accordingly is well understood. Lambe's lane and the turning circle will become public property and the snow clearing will be municipality's responsibility. However, our property management plan will include an additional back-up snow clearing plan for the property. We are open to discussing these details further and taking additional suggestions.

f) Lambe's Lane road condition: These issues will be greatly improved by the upgrades included in our proposal.

g) Expropriation: We are currently in discussion with facilities. The land in question has services that are currently tied into MUNL's system. We have a proposal to add additional capacity alongside the sewer services (without tying into MUNL's capacity). For this we may require access to the serving area for a short time to upgrade the services in general. These discussions can be had in more depth with our engineers and your facilities.

h) Bus stop: we had not considered this, seeing as most of the students in our potential building will be at walking distance to campus. However, we are open to discussing having a bus shelter.

i) Proposed development ingress/egress: Egress guidance must be followed according to Building Code and will be part of the planning and permitting stage. A larger discussion with MUNL can be had to share details.

j) Impact on business model: We understand and validate these concerns.

It is not in our business model to house first year students. In fact, we have not had any first-year students lease our units in the last 5 years. We plan to redirect any inquiries from first-year students to the MUNL residences office (unless MUNL would require assistance in housing individuals in which we would be happy to help).

Our model is to develop near universities where the supply of university residences does not meet the number of students enrolled. For example, we have projects in proximity to the Dalhousie University campus. Dalhousie is a university with similar enrollment about 20,000 enrolled over their campuses, and with about 2311 University residence beds. The number of apartments available close to campus, even including those that have been built in the last couple of years do not keep up with the need for student accommodation. Hence our development project on Seymour Street – also built very close to campus and will serve close to 500 students looking for safe, affordable, and convenient apartments.

l) **Potential noise concerns for neighboring Alumni House.** We take noise issues very seriously and although we cannot manage all noise, we do manage our buildings in a way that encourages love and respect for the community. Live-in super-intendants and additional management will be integrated into the day-to-day property management.

Note that generally, our buildings are quiet during the day, while students are studying (or sleeping).

We look to continue to improve the living experience for all. Our most important goal is to ensure students have the right environment to excel in academics and enjoy their university experience. Thank you kindly for providing a written list of your concerns, we are open to discussing all and any issue further in person at your convenience.

Sincerely,

Maggie Terrone
Vice President, Atlantic Canada
902-442-8408 x 201 | maggie@werkliv.com
www.werkliv.com

Building Quality.
Of Life.™

MEMORIAL UNIVERSITY

Office of the Vice-President (Administration & Finance)

St. John's, NL Canada A1C 5S7
Tel: 709 864 8217 Fax: 709 864 8028 www.mun.ca

August 13, 2021

To Whom It May Concern:

RE: WERKLIV DEVELOPMENT PROPOSAL - 6 LAMBE'S LANE

Further to the August 10, 2021, public meeting held regarding the development of 6 Lambe's Lane and the revised submission the university made to Council via letter dated August 6, 2021, please be advised that the university did receive Werkliv's response dated August 10, 2021, which Werkliv indicated they would be providing to the City.

The university would like to go on record as stating that, although it appreciated Werkliv's response, it feels the response did not directly answer many of the concerns raised by the university and the university does not adopt or accept Werkliv's response as a fulsome or acceptable response to the university's concerns.

The university reiterates that all of the concerns raised in the August 6, 2021, letter are valid and unanswered concerns.

It was very apparent from the August 10, 2021, public meeting that not only the university has concerns but St. Augustine's Anglican Church and many local residents share these concerns. Various voices at the meeting reiterated the concern with the City allowing the requested parking variance. Parking is already a major concern in that area among residents and on behalf of the church and there was nothing stated by Werkliv neither in its response to the university nor in its answers to questions raised at the meeting that would serve to alleviate those concerns.

Werkliv's response was that there are simply not enough housing options close to campus. As discussed at the meeting, this is not the case. There are university owned and operated apartments and residences on campus and many rental options for students all in very close proximity and within walking distance to campus. To think that an apartment complex with 205 units housing 650 (or potentially more) students would eliminate vehicle use because of its proximity to campus is simply not feasible. It does not take into account other uses students have for their vehicles such as visiting family and friends, carrying out errands, shopping, going on outings, etc., in other parts of the City as well as outside of the City. It does not account for the considerable parking requirements for visitors to the building. Werkliv's response to these issues was to compare St. John's to European cities where people bicycle and walk everywhere. That is not happening in St. John's. Allowing the requested parking variance will lead to a larger congestion and parking problem than already exists in that area.

Werkliv has repeatedly indicated that they have consulted with the university on issues of concern yet, to date, there has been only one communication of which we are aware and that served as an introductory discussion rather than a meaningful discussion of their proposed project and its impact on the university.

The university would like to take this opportunity to reiterate all of its concerns and to advise that it does not adopt Werkliv's response as any real answer to the concerns of the university.

Sincerely,

Kent Decker

Karen Chafe

From: [redacted]
Sent: Thursday, July 15, 2021 10:20 PM
To: CityClerk
Subject: (EXT) 6Lambe's Lane

Parking is a problem in MUN area. How can approval be given for relief of 254 parking spaces.?. Additionally Lambe's Lane is a lane at best . Difficult to drive to and from church in winter.
I cannot support this proposal.

[redacted]
Sent from my iPad

Karen Chafe

From: [redacted]
Sent: Friday, July 16, 2021 12:10 PM
To: CityClerk
Subject: (EXT) 6 Lambe's Lane

Hi, I am writing to voice my support for what appears to be a beautiful, thoughtfully designed project that could do much to improve how the city of St. John's thinks about apartment housing.

I support their request to have full parking relief at this site.

And *as long as the built heritage experts panel has no objections*, and a plan is made to salvage the existing building (which is woefully, shamefully slipped under the rug in this otherwise excellent plan) for materials, this project would have my enthusiastic support.

Kind regards

[redacted]

[redacted]

Jennifer Squires

From: Karen Chafe on behalf of CityClerk
Sent: Monday, August 9, 2021 10:02 AM
To: Jennifer Squires; Andrea Roberts; Ashley Murray; Ann-Marie Cashin; Dave Wadden; Jason Sinyard; Ken O'Brien; Lindsay Lyghtle Brushett; Planning
Subject: FW: (EXT) Lambe's Lane Development Public Meeting

From: [redacted]
Sent: Monday, August 9, 2021 10:00 AM
To: Ian Froude <ifroude@stjohns.ca>
Cc: CityClerk <cityclerk@stjohns.ca>; Mayor <mayor@stjohns.ca>
Subject: Re: (EXT) Lambe's Lane Development Public Meeting

Thank you for responding. I am amazed that the City will even entertain such a deviation from its regulations, especially so close to the end of its term. The residents of our area have major concerns for current and future implications.

This is not a Memorial University sponsored, nor supervised project. **It is a private, for profit proposal which will not follow City by-laws and regulations. To exempt a company from providing mandatory 254 (two hundred fifty four) parking spaces is not a minor adjustment. It is unrealistic and lacks any semblance of good judgement.** The timing of the request is also questionable, and could be issue of contention in the upcoming election.

As our Ward representative, I ask that you ensure that any construction in this area follow current guidelines.

[redacted]

On Jul 26, 2021, at 10:19 AM, Ian Froude <ifroude@stjohns.ca> wrote:

> Thank you for the feedback, [redacted].
> I notice you have copied the City Clerk, so they will ensure the link is active and rules are being followed.
>
> Ian Froude
> Councillor - Ward 4 | Conseiller municipal – District 4
> City of St. John's, NL | Ville de Saint-Jean, TN
> (709) 576 - 8217
>
> ---
>
> **From:** [redacted]
> **Sent:** Saturday, July 24, 2021 10:50 AM
> **To:** Ian Froude <ifroude@stjohns.ca>; CityClerk <cityclerk@stjohns.ca>
> **Cc:** Mayor <mayor@stjohns.ca>; Sheilagh O'Leary <soleary@stjohns.ca>; Deanne Stapleton <dstapleton@stjohns.ca>; Debbie Hanlon <dhanlon@stjohns.ca>; Jamie Korab <jkorab@stjohns.ca>; Maggie Burton <mburton@stjohns.ca>; Wally Collins <wcollins@stjohns.ca>; Sandy Hickman <shickman@stjohns.ca>
> **Subject:** (EXT) Lambe's Lane Development Public Meeting
>
> Your link posted in today's paper referencing the Lambe's Lane Development does not appear to be active.

Unfortunately the timing of this request and the invalid link will prevent people from registering a reaction for a development whereby exemptions from several City regulations are being requested.

Again, I wish to issue a strong objection to construction of any apartment complex in our area that does not meet current city code standards, especially with respect to parking.

I have lived on University Avenue for the past 34 years. There is currently no parking available for people to visit my home before five pm, and that is without University in session. I also have problems accessing my mailbox on [redacted] when University and schools are in session. All streets in this area experience the same problems.

* To exacerbate the current situation is totally unacceptable.

* To use the excuse that the apartments will be designated for students with no access to transportation flies in the face of logic when one sees empty residences and experiences students seeking to rent parking spaces in private driveways to provide access to parking.

I respectfully ask that the information published be corrected and my concerns taken into consideration.

[redacted]

<image001.jpg>

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Any correspondence with employees, agents, or elected officials of the City of St. John's may be subject to disclosure under the provisions of the Access to Information and Protection of Privacy Act, 2015, S.N.L. 2015, c.A-1.2.

Jennifer Squires

From: [redacted]
Sent: Tuesday, August 10, 2021 4:36 PM
To: Jennifer Squires
Subject: (EXT) Re: Public Meeting - 6 Lambe's Lane Confirmation

Hi Ms. Squires,

Some questions for tonight's Zoom meeting re Lambe's Lane:

1. Will any of the units be rented to the public? What is prohibiting this from happening.

2. Is not owning a vehicle while leasing an apartment a condition of leasing?

3. Does the developer realize that the parking spaces in the area are now heavily used by clients of those facilities ie, the Aquarena, St. Augustine's Church etc

4. How does the developer prose to change the culture of students to alternate forms of transportation.

Thank you,
[redacted]

Sent from my iPad

On Aug 9, 2021, at 9:41 AM, Jennifer Squires <no-reply@zoom.us> wrote:



[redacted]

u for registering for Public Meeting - 6 Lambe's Lane. You can find information about this meeting below.

Meeting - 6 Lambe's Lane

& Time Aug 10, 2021 07:00 PM Newfoundland and Labrador

ng ID 897 8306 7505

Jennifer Squires

From: [redacted]
Sent: Wednesday, August 11, 2021 3:26 PM
To: Jennifer Squires
Cc: Ian Froude; CityClerk
Subject: Re: (EXT) Lambe's Lane Development Public Meeting

Further to last night's zoom meeting, my husband and I were registered to attend. Unfortunately we both had prior commitments and were a little late checking in. I did take some notes, but must have missed some points and dialogue on how this proposal got as far as it did despite violating basic City codes.

1). Would it be possible to obtain a copy of the minutes of that session?

2). Was any investigation undertaken on the company making the proposal, ie background, experience, membership of its board of directors, or any Newfoundland connections? It seems unusual that such a basic requirement as **205....TWO HUNDRED FIVE** parking spaces could be bypassed as well as bypassing codes for space variances.....the latter being far more important considering the confined road space both to the property and on the property itself.

3). I was concerned over the comment that the complex could not be mandated for university students only, but basically no one else would want to live there??? Will the City be assuming liability over what such a complex could create?

4). Finally, has there ever been a proposal of a similar nature reviewed by Council, and if so, what was the result?

Anything you could provide would be greatly appreciated.

[redacted]

Sent by me

On Jul 26, 2021, at 10:02 AM, Jennifer Squires <jsquires@stjohns.ca> wrote:

> Good Morning [redacted]
>
> There was an error in the link when it was originally posted, it may have carried over to the version in the paper. Staff are in the process of sending out a revision for future publications. The online link is correct and if you would like to register you can do so at the following:
>
> Register in advance for this meeting:
> https://stjohns-ca.zoom.us/meeting/register/tZ0qf-goqDwvGtEZAgX4wNhEUb8cAJhyGUS0
>
> After registering, you will receive a confirmation email containing information about joining the meeting. If you require any additional assistance please let me know.
>
> Thank you,
>
> Jennifer Squires

Karen Chafe

From: [redacted]
Sent: Saturday, August 14, 2021 10:44 AM
To: CityClerk
Subject: (EXT) 6 Lambe's Lane re-zoning

To Whom it May Concern:

My husband and I have lived at [redacted] for over 30 years. According to your memo, this puts us within the proximity of the application site for the construction of three apartment buildings and a 254 vehicle parking space at 6 Lambe's Lane specified for public consultation.

We are totally opposed to this project. This area, along with the adjacent fields beside the Aquarena and Prince of Wales Collegiate, comprise the only space in this immediate part of the city that offers a home and feeding area to birds and other wildlife, as well as to trees, grasses, and wildflowers. It is a quiet, tree-lined area - a green space - used by dog walkers, students, schoolchildren, and nature-lovers, as well as parishioners at the Anglican church beside it. The construction and subsequent buildings and parking lot proposed would totally destroy all of this, and add one more to the stripped and destroyed green spaces of our City - at a time when the City seems simultaneously to be trying to augment green spaces.

Please do not allow this re-zoning and project to go ahead.

Sincerely,
[redacted]

Jennifer Squires

From: Karen Chafe on behalf of CityClerk
Sent: Tuesday, September 7, 2021 11:04 AM
To: CouncilGroup; Executives
Cc: Andrea Roberts; Ann-Marie Cashin; Ashley Murray; Dave Wadden; Jason Sinyard; Ken O'Brien; Lindsay Lyghtle Brushett; Planning; Jennifer Squires
Subject: FW: (EXT) Lambe's Lane Development

From: [redacted]
Sent: Friday, September 3, 2021 10:21 PM
To: SarahStoodley@gov.nl.ca
Cc: Ian Froude <ifroude@stjohns.ca>; CityClerk <cityclerk@stjohns.ca>; Mayor <mayor@stjohns.ca>
Subject: (EXT) Lambe's Lane Development

As MHA for our area, I thought you should be aware of the following. I have been advised by the City Planning Office that it will be a topic for Monday night's City Council meeting. I have also been advised that this is the first time such a request has ever been entertained.

I ask that you consider whether a proposed development, on inadequate space, for three buildings consisting of 205 apartments for 600 people, with an exemption request for ANY PARKING SAVE FOR THREE HANDICAPPED SPACES .... in an area where there is no off street parking, and despite objections from MUN, St. Augustine's Church and the residents of the University Avenue and Elizabeth Avenue areas .... is appropriate. These complaints were voiced via a Zoom call, during August, with the referral to Government coming on the Labour Day weekend.

My apologies for the late notification, as I was only made aware of this today following my phone call requesting a status update.

[redacted]

Begin forwarded message:

> **From:** [redacted]
> **Date:** September 3, 2021 at 1:54:56 PM NDT
> **Subject: Lambe's Lane Development**
>
> I spoke with you a while back regarding the proposed Lambe's Lane development. You referred me to someone in Municipal and Rural Affairs, and I left a message but no one called me back. For the record, could you please relay my comments below to the appropriate parties? Thanks.
>
> There is a proposal to develop 6 Lambe's Lane (next to the Aqua Arena and St. Augustine's Church) into a private, for profit three building complex housing 205 apartments for 600 people. This is not associated with MUN. The contractor is not Newfoundland based.
>
> The City is requesting two exemptions:

- The first allows for an exemption from providing ***any*** parking spaces except for three handicapped spaces, which are required by law.
- The second requests a space variance exemption, as the area in question is not large enough to house the buildings themselves. The rationale is that the building will be designed for students who will not have cars.

I just wanted to reiterate the concerns of the people of the University Avenue area with respect this request, which I understand will be going to St. John's City Council on Monday night and, if approved, then be forwarded to your Department for Government approval.

I attended a Zoom meeting sponsored by the City for reaction. Concerns relative safety, oversight, security, emergency access, deliveries, traffic flow behind Aqua Arena, confusion with MUN housing and damage to Memorial's branding, and especially parking were expressed by Memorial University, St. Augustine's Church, and residents of the Elizabeth Avenue area and the University Avenue area, as well as others.

We learned from the meeting that the developers cannot mandate that residents only attend post secondary, nor that they cannot have a vehicle. The comment made that "Nobody else would want to live there" was extremely worrisome for our neighbours..

In addition to the other issues raised, we have lived for forty years in our home and know only too well the area's struggles respect to student parking during regular times. If there is such a need for housing, a more appropriate solution would be to redevelop the Hoyles Escasoni Complex which has the space, the parking and is more suited to accommodate MUN, the Marine Institute and CONA students. The solution is not to ignore City codes and construction guidelines which were established for valid reasons. To ignore or amend these regulations will create precedents which will be impossible to walk back from.

The timing of the request has also raised flags:
- so close to the end of the current Council's term;
- rushed through in August month (when many houses in our area are in transition), the adjacent two schools are closed, and Memorial is in closed session;
- being brought to Council on Labour Day weekend during the back to school/university/work timeframe;
- during Covid restrictions through Zoom, which severely restricts participation (especially since the first link to register was not working).

The concept that consideration would be given to ***THREE*** apartment complexes without the appropriate space requirements, and ***WITHOUT ANY PARKING,*** in an area where on street parking is banned, seemed impossible. However, common sense and good judgement appear to be in short supply and we are now at this point in the process.

I wanted you to be aware of the concerns of the area residents, the Church and the University prior to your making this decision.

Thank you for your consideration

[redacted]