

John Fleming, MCIP, RPP
Principal – City Planning Solutions
john@cityplanningsolutions.com
519-476-0071

City of London Planning Committee and Municipal Council
c/o City Clerks Office
pec@london.ca

This submission relates to item 4.1 “Comprehensive Review of the London Plan Update” on Planning Committee Agenda – July 17, 2023

Re: Request for Industrial Land Conversion and Re-designation for Residential Purposes – Land Needs Assessment and Official Plan Review Process

I am submitting this letter on behalf of three property owners that hold approximately 25 ha of land within the Commercial Industrial Place Type in Hyde Park. We are requesting that Staff and Municipal Council consider the conversion of these lands from the existing Commercial Industrial Place Type to a new Place Type that will allow for intense forms of residential development. The following letter provides an overview of the subject area, the character of the uses that currently exist, and a brief planning rationale for the requested conversion.

We understand that a formalized process is about to begin to consider such conversions and we would like to participate in that process. We will provide additional information and more detailed planning analysis throughout that process.

Land Ownership

The property owners hold land within the area generally bounded by Fanshawe Park Road West (north), Hyde Park Road (east), Gainsborough Road (south) and the Hyde Park Bike Trail (west). Figure 1 outlines the properties owned by these three parties.

Official Plan Review Process, Land Needs Assessment and Industrial Land Conversion

It has come to our attention that the City of London intends to launch a review of the London Plan – initially adopted by City Council and approved by the Province in 2016. This process will involve an evaluation of land supply to meet projected growth needs for the next 25 years. As part of this land needs assessment, we understand that the City will consider whether there are industrial lands in the City that would be better used for other purposes, such as mixed use residential development.

Figure 1 – Land Holdings Owned by Proponents

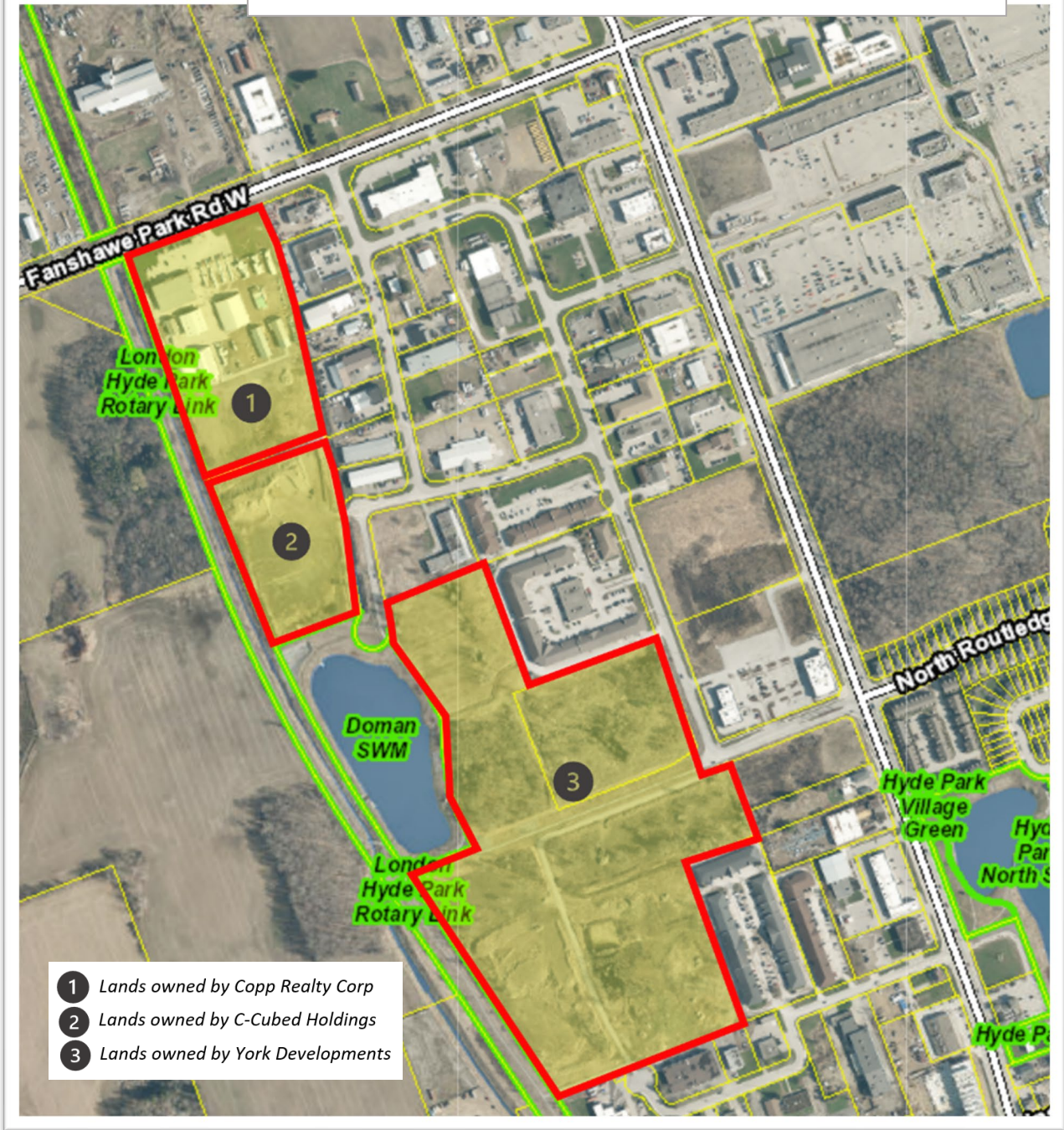


Figure 2 shows the Place Types that are currently applied to lands within the are of interest. More specifically, Figure 2 shows a Place Type referred to as “Commercial Industrial”, shaded in purple. This is the area that we are requesting be converted to an alternative Place Type to support a transition to mixed use residential.

The Commercial Industrial Place Type is intended to accommodate a mix of commercial and light industrial uses that are compatible with one-another. The range of industrial uses is limited and does not include those that would impose significant impacts from noise, vibration, odours or emissions.

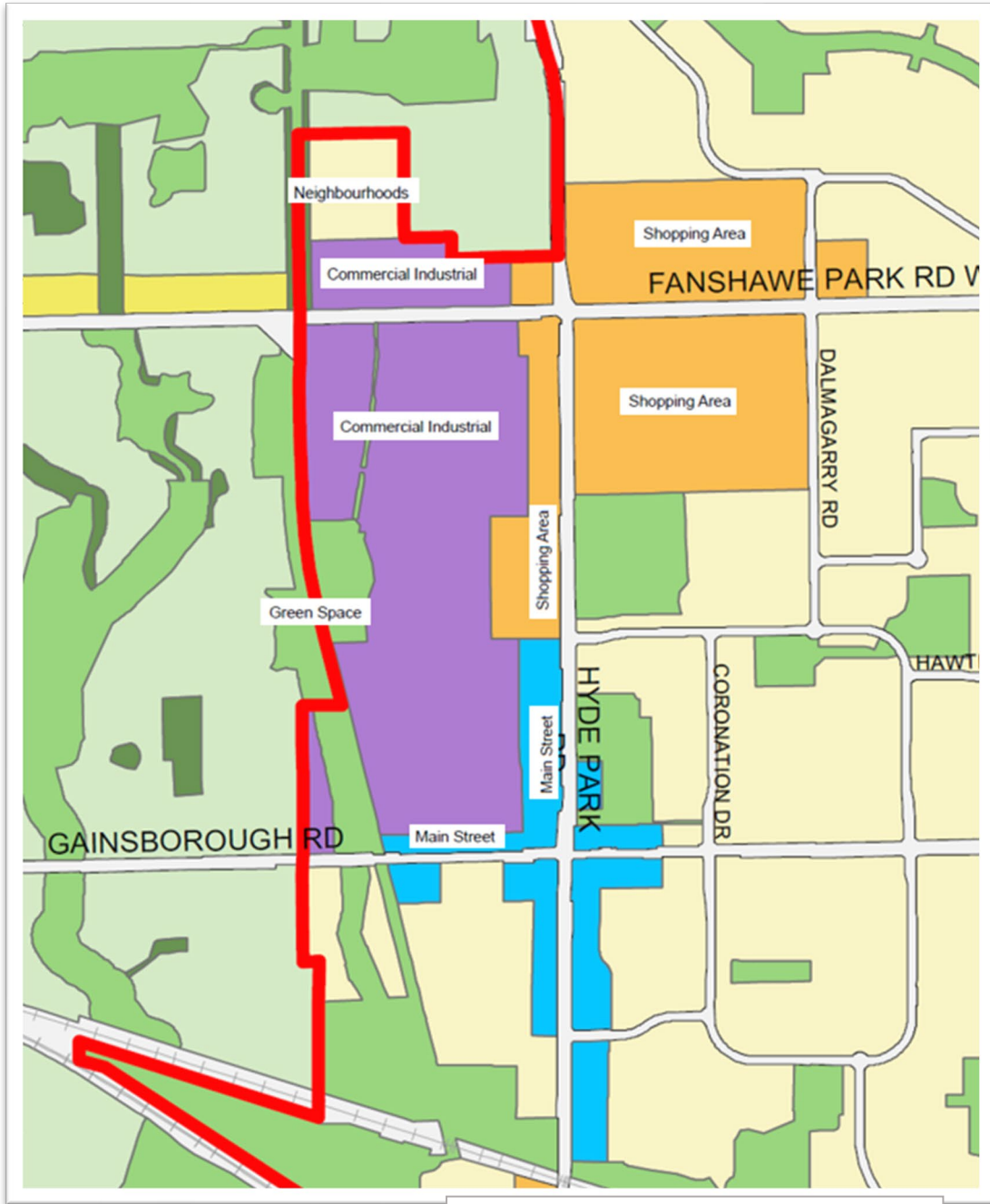
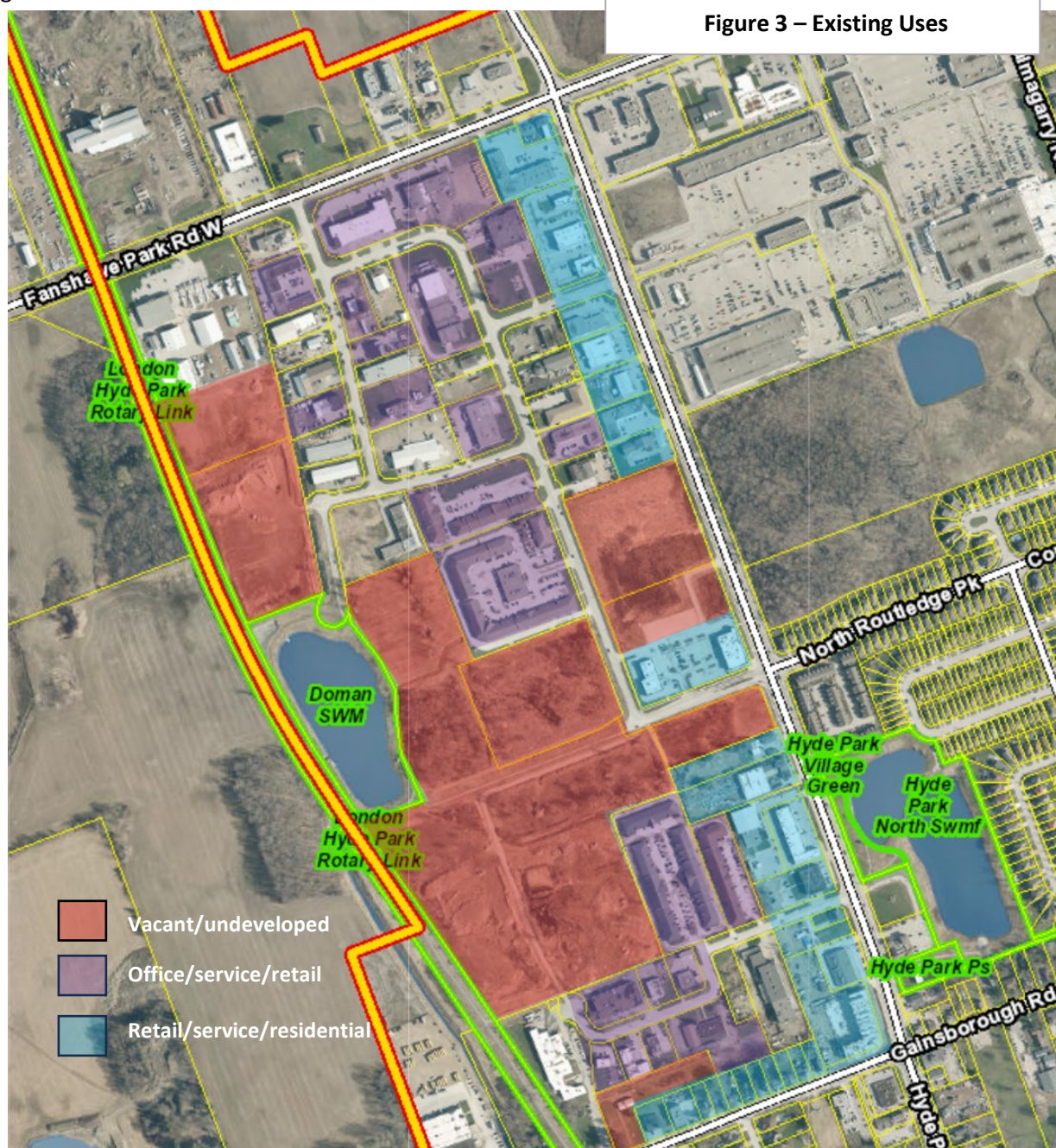


Figure 2 – London Plan Designations

Character of the Area

The 1989 Official Plan identified the subject lands as “Light Industrial”. However, the proliferation of non-industrial uses into this designated Light Industrial area was recognized within the 2016 London Plan, whereby the new Commercial Industrial Place Type was applied.

Figure 3 shows a high-level overview of existing uses in the area. A light blue shading has been applied over the lands assigned either as a Main Street Place Type or a Shopping Area Place Type, both of which allow for a broad range of commercial and residential uses.



Existing uses in the blue shaded area are primarily retail and service commercial, but a mid-rise residential tower with commercial uses at its base is currently under construction at the northwest corner of Gainsborough Road and Hyde Park Road.

Figure 3 also shows red shading, which depicts vacant/undeveloped lands. Approximately 40% of the Commercial Industrial Place Type is vacant and the majority of this land is clustered together and in close proximity to the Doman Stormwater Management Pond.

The purple shaded areas on Figure 3 show lands which are primarily used for office, service commercial or retail purposes within the Commercial Industrial Place Type. Many of the properties shaded in purple look like strip plazas from the street, have no outdoor storage and generally have well maintained front yards similar to any other office park or retail commercial area. A large number of these properties are occupied by retail and service commercial uses, such as home improvement display and sales, printing services, commercial gyms and health services. There is also a cluster of social services and children services - including a large daycare use.

Rationale For Requested Conversion of Place Type

This submission requests conversion of the current Commercial Industrial Place Type to a new Place Type that will allow for intense forms of residential development. The following provides a brief planning rationale for such a change:

1. The Commercial Industrial designation does not represent an employment area as defined by the Planning Act and proposed Provincial Planning Statement. Both of these documents include definitions of “employment area” that exclude office and retail uses unless they are associated with an industrial use. As shown on Figure 3, there is an abundance of retail and office uses in the Commercial Industrial Place Type that are not associated with manufacturing, research and development or warehousing uses, suggesting that this area is not consistent with the Province’s definition of an employment area. Accordingly, the loss of an employment area should not be a consideration for the requested land conversion.
2. This “legacy industrial area” has lost much of its value and amenity to accommodate industrial uses. What was once a relatively remote light industrial park on the fringe of London’s urban area is now surrounded by highly urban uses of a commercial and residential character. This creates significant challenges for industrial uses such as:
 - a. Increasingly busy commercial/residential areas surrounding these lands make access from major transportation corridors congested and difficult to use for delivery vehicles.
 - b. Truck-car conflicts are a problem, given the substantial volumes of car traffic associated with commercial and residential uses.
 - c. There is growing potential for nuisance complaints generated by surrounding residential and commercial uses that have now built up around this area.
 - d. Alternative industrial areas of the City exist that are separated from commercial and residential uses and are better located for access to highways and truck routes.

As a result, the area has been steadily transitioning away from a light industrial character to a more commercial and office character over time. This is clearly illustrated in Figure 3.

3. Redesignation of these lands to a non-industrial place type would allow the City to consider an alternative location for industrial uses. This could be accomplished through the designation of new industrial lands in a location that is better suited for attracting new industrial businesses to London.
4. This area is located within a 5-10 minute walk to the large commercial node at Hyde Park Road and Fanshawe Park Road West. Development of these lands for intense residential uses would be consistent with the “15-Minute City” concept, whereby the daily needs of residents can be easily attained within a 15 minute walk. This is also consistent with the Province’s emphasis on building more complete communities.
5. Intense forms of residential development on these lands would be positive from a climate change perspective. It would reduce reliance on cars by locating a large number of housing units in close proximity to a broad range of commercial goods and services, cycling infrastructure and transit.
6. Residential development on these lands would support commercial uses in Hyde Park, including those smaller scale commercial uses that are emerging in the Hyde Park Main Street area
7. These lands are well serviced by extensive transportation infrastructure. Major (and costly) improvements to Hyde Park and Fanshawe Park Roads were completed within the past 5-10 years and the proposed intense forms of residential development within the subject area would more effectively utilize this infrastructure.
8. This area is well serviced by LTC transit, with direct routes to various destinations such as Masonville Mall, Western University and links to Downtown London.
9. This area is well serviced by existing water, sanitary and storm sewer infrastructure. Allowing for residential intensification in this area will strategically take advantage of this costly existing infrastructure and help to reduce pressure for new services on more remote vacant lands.
10. As shown on Figure 3, there is a substantial amount of vacant land within the Commercial Industrial Place Type – approximately 40% of the Place Type’s land area. This represents almost 25ha+ of developable area that can be carefully planned to avoid potential land use conflicts with existing uses and to create a new character for the area, encouraging further transition of the remaining lands over time.
11. A large amount of this vacant land is owned by a small number of land owners. This improves the opportunity for development that is well coordinated from a layout, sequencing, servicing and timing perspective.
12. The vacant lands in the area are clustered/consolidated, allowing for the creation of a coherent residential plan that can offer a distinct residential environment with quality residential amenities.
13. The vacant lands are generally surrounded by uses of a retail or office character, minimizing the potential for land use conflicts. The existing streets leading to the developable lands are not fronted by unsightly industrial uses; these streets would present a positive entrance into a new residential community.

14. Development of the vacant lands in this area can be focused on the Doman Stormwater Management Pond to provide an excellent community focal point and various recreational opportunities.
15. The London Hyde Park Rotary Link will provide an excellent amenity for residents of this area. It provides a paved pathway for walking and cycling and connects to London's extensive trail and park system.
16. The Commercial Industrial designation represents a significant underutilization of these lands. Intense forms of residential development would represent a higher-order use of these lands and would better utilize the municipal investment in this area.
17. With a new Place Type to support residential development, existing uses could continue in this area based on the needs and desires of the existing property owners and their tenants. At the same time, assigning a new Place Type that allows for a more intense and valuable land use than what currently exists will encourage the market to transition away from these existing lower value uses over time.
18. The City of London needs more housing. The proposed conversion would create a significant opportunity for the development of intense forms of housing that could add a large supply of housing in the near future.

Summary

Clearly there is a strong planning argument to redesignate the Commercial Industrial Place Type in the Hyde Park area to establish a new designation that permits intensive forms of residential development. Doing so would allow for a higher order use of this land that takes advantage of existing servicing infrastructure, supports complete communities, allows for alternative forms of transportation, and creates a substantial supply of new housing within an existing urban area. With a substantial amount of vacant land clustered on the west side of this Place Type, there is opportunity to carefully plan for a new residential community and avoid potential conflicts with existing uses. This would set the stage for the remainder of the area to transition over time.

We look forward to participating in the upcoming land needs assessment process and we would appreciate the opportunity to work with Planning Staff and provide a more complete planning analysis in support of this conversion.

Sincerely,



John Fleming, MCIP, RPP
Principal – City Planning Solutions
john@cityplanningsolutions.com
519-476-0071