

## **LONDON AREA PLANNING CONSULTANTS – LAPC**

(a local organization of private professional land use planners)

January 13, 2012

**Chair Bud Polhill and Committee Members  
Planning and Environment Committee  
City of London  
300 Dufferin Avenue  
London ON  
N6A 4L9**

**Re: City file number O-7970-Official Plan Amendment Application concerning the INTENSIFICATION POLICIES in the City's Official Plan.**

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**Dear Chair Polhill and Committee Members:**

This letter is being submitted on behalf of the LONDON AREA PLANNING CONSULTANTS – LAPC. I am acting President representing approximately 25 professional planners in the London area working for planning and engineering consulting firms and land development companies.

The members of LAPC have met only last Wednesday, January 11, 2012 and significant concern was expressed that the proposed changes to the policies are insufficient to achieve infill and intensification development. As we know intensification is so encouraged by the Provincial Policy Statement and the City's Official Plan, and otherwise known to be a solid and sound land use planning principle.

Our comments are as follows:

Recommended Changes that LAPC AGREE WITH are as follows:

1. The recommended change to section 3.2.3.1 that would ensure vacant blocks in new plans of subdivision are not part of Residential Intensification;
2. The recommended change to section 3.2.3.5 are IN PART - specifically that describes instances where development applications already has a public process to enable the address of site plan review.

The concerns of LAPC are as follows:

1. The recommended change to section 3.2.3.1 which would subject all consents for land severance to the intensification process. For example, severing a single detached lot into two lots and requiring the new residential building (or buildings) to require a public site plan review with such documents and studies as a neighbourhood character study, a land use compatibility statement, a planning impact analysis and an urban design brief, is inappropriate ("overkill"), and would serve only to discourage the overall goal of infill and intensification;
2. The recommended change to section 3.2.3.5 that excepts ... "single detached dwelling conversion to add one additional residential unit only" ... is very limiting and the unit count

should be higher. "Conversions" are about changing the interiors of buildings and there can be no additions (to meet the City's definition). Off-street parking and landscaping can be regulated through Site Plan Approval – and public site plan review with such documents and studies as a neighbourhood character study, a land use compatibility statement, a planning impact analysis and a an urban design brief, are significant requirements, that are unnecessary, and again serve only to discourage the overall goal of infill and intensification;

**LAPC sees that there are two underlying problems, as follows:**

- A. It is the line between "minor intensification" and major intensification" that needs to be better defined .** Making sure "major" intensification is scrutinized through the public site plan review and that the necessary studies are completed is appropriate. However, there is a significant amount of "minor" intensification that occurs that should not be subjected to site public plan review and the various studies. . It may be based on the Official Plan policies of land use and density thresholds or the broad zoning category or by other means. LAPC does not have the "answer" but would participate in developing one.
  
- B. Consolidating the Studies required ...** In addition, the task of improving the Residential Intensification policies could be improved by streamlining the required documentation. The required Neighbourhood Character Study, the Planning Impact Analysis, the required Land Use Compatibility Statement, and the required Urban Design Brief could be scoped, down-sized and consolidated into one document perhaps titled, "Planning and Design Analysis". The time and expense saved would help to encourage infill and intensification. LAPC does not have the clear "answer" here either, but would participate in developing one.

#### **Conclusion**

Points A and B above are significant and more time and study is required. Therefore, we would ask PEC to refer back the Staff Planning Report and Recommendation, to be given further study in conjunction with LAPC (and interested others) and to be brought back in the near future. LAPC believes that more can be done to encourage infill and intensification that would contribute positively to the City of London in the long run.

Respectfully,

**Laverne Kirkness, BES.RPP.MCIP.  
Acting President – LAPC**

cc. Sean Meksula  
cc. Gregg Barrett  
cc. John Fleming  
cc. LAPC members