

June 22, 2015

The Corporation of the City of London
London, ON N6B 1Z2

ATTENTION: Chair and Members of the Planning and Environment Committee

RE: London Plan – Second Draft Comments

I respectfully submit this letter to Council and staff for consideration regarding the London Plan as presented in the second draft.

- I attended the last Shift PIC, and the preferred routing presented differs significantly from that which is shown in the London Plan on Map 1. It is my understanding that the preferred alternative of Shift will be revealed in October 2015. The London Plan will have to undergo another substantial revision to ensure consistency with Shift after October 2015. Please outline how staff intend to accommodate the changes prescribed by Shift, and the expected timelines. I suggest that any discussion of the London Plan must be prefaced by stating that it will change substantially pending the outcome of the Shift EA process.
- The London Plan purports to facilitate infill, intensification and redevelopment in order to maximize the use of existing infrastructure. This policy direction is a positive one. In my opinion, however, the London Plan effectively discourages infill, intensification and redevelopment in the Neighbourhood place type prohibiting much of London from realizing many significant redevelopment possibilities. For example, the range of permitted uses in the Neighbourhood place type on a neighbourhood (local) street only go up to a semi-detached or duplex type form. There are many existing low and medium rise apartment buildings (4 and 6 storey) located on local streets which many would argue have enhanced these existing neighbourhoods. To prohibit duplication of these forms of housing on local streets seems contrary to the overall goals and objectives of the London Plan. To discourage the development of even something like townhouses on local streets seems heavy-handed. Even a neighbourhood connector like Ridout Street is even limited to 2.5 storeys in height. There exists numerous mid and high rise apartment buildings on that street which provide not only a wide variety of housing options in that neighbourhood, but also contribute to the walkable nature, making transit viable.
- I am concerned that because of the desire to only locate higher density forms of development along RT corridors and the downtown, we will miss out on opportunities for redevelopment and intensification in other areas of the city which already can accommodate higher density developments. There are many areas in the city which have ample shopping and employment opportunities, multiple public transit routes and perhaps unused servicing capacity which will simply continue to be underutilized. The London Plan perpetuates the development of low rise building

forms in all areas other than as prescribed. Is this not what is often characterized as “*urban sprawl*”? Are we really saying “no” to any development over four storeys (six with “bonusing”) on streets like Fanshawe Park, Wonderland, Commissioners, Springbank, and Adelaide etc.?

- By severely limiting the locations for higher density forms of development, you restrict the supply of lands suitable for a select style of development. Prices for lands along the RT corridors, nodes and downtown will likely increase. This makes land assembly more difficult, time consuming, costly and will ultimately result in more expensive built forms – something which does not favour creation of affordable housing. Note that the most affordable forms of housing are typically higher density in nature.
- Someone who wishes to facilitate the construction of a higher density building form in an area where it is not expressly supported by the London Plan may apply for an Official Plan Amendment. However, in reading the London Plan, it seems to be authored in such a way that amendments will be extremely difficult. For example, under the current OP, if I want to go from low to medium density, I apply for an OPA which states I want to apply for the change from low to medium. In the new plan, densities are only prescribed by the street classification system. Do I apply to have the street classification changed, or do I apply for a different place type that suits what I want to do? Or, perhaps it is as simple as the creation of a special policy pertinent to the subject lands. There is currently no clear way to seek a change to the London Plan on a site by site basis. I am concerned this perception will have two consequences. The first will be the reluctance for anyone to contemplate such an endeavour, thereby slowing the rate of infill, intensification and redevelopment. Secondly, if an applicant does decide to proceed with an application, the “plain language” in the plan is open to many interpretations and may cause a form of planning gridlock as the application process may grind to a halt.
- The London Plan should clearly state that property owners shall be allowed to reconstruct buildings in the same form and intensity should an “act of God” occur and the building be destroyed regardless of the overlying place type designation or street classification. Additionally, developments at the end of their natural life cycle should be allowed to be reconstructed to replicate the same form and intensity of use regardless of place type or street classification.

DEVELOPRO LAND SERVICES INC

One goal of this plan is to accommodate 40% of all new residential development within the built-area boundary of the city. According to city staff, over the last 5+ year period, we achieved 36%. This was under a plan which was purported by many to create urban sprawl, and allow development to occur in a haphazard manner. In reality, what the existing OP allowed were market driven responses to demands made by the public for a wide variety of housing options in a wide variety of locations, something which the London Plan does not appear to have the flexibility to achieve.

Sincerely,

Craig Linton
Developro Land Services Inc.