

London Development Institute

June 22, 2015

Hand Delivered

City of London
300 Dufferin Avenue
London, Ontario
N6A 4L9

Attn.: Chair and Members of the Planning and Environment Committee

Re: The London Plan, Second Draft Review

Chair and Members of the Committee,

The LDI appreciates the opportunity to review the second draft of the London Plan as revised based on the comments received from the review of the first draft. We have been actively reviewing the second draft with our members and consultants against our initial comments, the comment matrix provided by city staff and relevant comments from the Provincial reviewing Agencies. We acknowledge and appreciate the opportunity to work with staff on outstanding development issues and to provide our final comments on the draft plan by October 2, 2015.

We recognize the great effort staff have put into the London Plan and the excellent response from the public through the ReThink London process to make London an exciting exceptional city. It is the Planners role to filter these comments into a realistic and obtainable vision for the future of the City.

The intent of this letter is to raise some general concerns with the overall policies and vision presented in the London Plan. We are not looking to discuss the details of any specific outstanding development related issues that we have with the revised document at this time, but rather to raise concerns that Council should consider when reviewing the plan and the affect on future costs to the tax payer to implement the plan.

The London Plan paints an optimistic vision for the future of London in the different policies throughout the plan but it is silent on the costs to achieve the proposed goals. The development industry will pay its fair share of these costs in relation to their developments but the majority of the costs will be borne by the tax payer on enhanced capital projects and the ongoing operation and maintenance costs associated with these works into the future. With London's growth rate at less than 1% per year and without significant growth in the industrial and tech sector to create new jobs to bring

future residents to the City the majority of these costs will be borne by existing tax payers.

One of the goals in the preparation of the London Plan was to create a policy document using plain language for the benefit and comprehension of the greatest number of the citizens of the City. This goal has been achieved in part, but unfortunately the plan's complexity and length fails to provide clear direction on land use for specific properties. The current Official Plan provides clear direction on land use planning and accomplishes it in approximately 200 pages, not the 450 pages of the London Plan. In fact, the Plan still contains a policy that requires that all the text of the plan is to be read as policy creating a lengthy and cumbersome task for any development application review and approval.

At its core, the London Plan serves to focus growth and development through intensification, a principle tenant of smart growth. In doing so however, the policies of the plan go too far in dictating the form and location of housing that may not suit the market so that a rapid transit system can be supported by new growth. The net result is a shift in market supply and form which has already begun with the emergence of significant residential growth in surrounding satellite communities such as Dorchester, Ilderton, Komoka-Kilworth, Arva, and others to name but a few. In fact, the mobility policies of this plan go further in support of this external fringe growth by promoting the creation of park and ride facilities around the City's perimeter, and in conjunction with neighbouring municipalities.

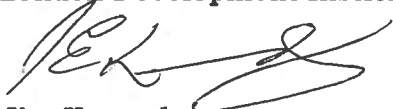
As you look around the City today you see well dispersed forms of higher density that meet market choices and provide opportunities for residents to age in place because not everyone wants, or needs, to live on a bus route, or in the core.

There are other considerations to be taken in account by Council as acknowledged in the staff report, including the outcome of the Rapid Transit EA for future routes and the changes to the Planning Act as proposed by the Province.

Again we appreciate the effort staff has put into the London Plan but proper time and consideration is needed when making a major shift in the direction of the Official Plan that will have implications for how the city develops and operates well into the future.

We look forward to continue working with staff on our concerns with specific policies in the plan related to development issues and we would like to offer to meet with members of the Planning Committee or Council to discuss any of the items raised in this letter or the London Plan in general, our door is always open.

Sincerely,
London Development Institute



Jim Kennedy
President, LDI

cc LDI Members