

London Development Institute

December 11, 2015

By Email

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

Attn.: Chair and Members of the Planning and Environment Committee (PEC)

Re: Review of Intensification Targets in the London Plan

Chair and Members of the Committee,

The LDI wants to raise some concerns with the Intensification Targets Report being presented to PEC on December 14, 2015. We further request that the Committee refer the report back to staff to meet with the industry to address our concerns with this report.

The report states “The inclusion of an intensification target in the London Plan provides a measurable benchmark that can be applied to test whether the policies of the Plan are having the intended consequences of directing development into the existing built up area.”

The London Plan is supposed to provide a comprehensive review of land needs and provide Intensification policies once the new Official Plan (OP) is adopted. The Built Area Boundary (BAB) should reflect the findings of the comprehensive review undertaken for the new OP and be based on the BAB as of 2015 to set the baseline to “test” if the new Intensification policies have the intended outcomes.

The 2006 BAB as proposed in the report is irrelevant to monitoring the new policies in the Plan because it is ten years out of date and covers a period under the current OP that has Intensification targets for all residential development set at 23%.

The fact that the passing of the Growth Plan for the Greater Golden Horseshoe occurred in 2006 is irrelevant to London’s intensification targets because their numbers are ten years ahead of London’s intensification targets and are not comparable to the London market.

The definition for BAB on page 446 of the second draft of the London Plan states “describes the built of the City as of January 2011.” (see attached)

The City Structure Plan on Page 34 shows the 2011 BAB which is different from the BAB on Page 2 of the PEC report. There has been no discussion on why this change has been made and why it shouldn't be the 2015 BAB.

The report goes on to say on page 3 that it is important to understand the role that the development market plays relative to intensification targets and that policy efforts to support intensification cannot be successful if they are fundamentally contrary to long term market trends. London has a well distributed supply of High Density Residential buildings that meet the requirements of the current OP and meet the market demand for location and living in place. Not everyone wants to live on rapid transit corridors or has a need for rapid transit.

The current OP has a High Density designation that covers all of the existing buildings and designates new High Density sites that have gone through a Community Planning Process. The London Plan refers to these approved High Density sites as Remnant High Density and vilifies them as threats for intensification and goes on to say they are not in accordance with the Place Type policies of the new Plan.

The majority of the lands designated High Density the in current OP are built out and will become non-conforming uses under the new OP in most instances.

Again these are existing OP designations and should be respected in the new Plan. The housing market will adjust to the new London Plan once it is approved and the Rapid Transit system is in place whatever type of system is selected. The intensification targets set in the new OP are to be measured over the twenty year life of the plan not just the first five years.

Sincerely,

London Development Institute



Jim Kennedy
President, LDI

cc LDI Members
cc John Fleming, City Planner

18.0 Glossary of Terms

1657_ By default, the common meaning of a term or phrase should be used to interpret the majority of policy in *The London Plan*. However, in some cases a specific definition is to be used in the interpretation and application of the policies of this Plan. For such cases, definitions have been provided below.

Abiotic factors are things which are non-living. Within an ecosystem, this could include such things as water, air and minerals.

Active transportation means human-powered travel, including but not limited to walking, cycling, inline skating, skateboarding and travel with the use of mobility aids for those who need them. Transit ridership is often seen as a form of active transportation, because every transit trip begins and ends with a walk. The active transportation network includes sidewalks, crosswalks, cycling lanes, designated streets and multi-use pathways to accommodate active transportation.

Accessory and ancillary means a use, building or structure that is incidental, subordinate and exclusively devoted to the main use and carried on with such main use, building or structure on the same lot.

Adaptive re-use means the conversion of an existing building for a use that differs from the use it was initially constructed for. In most cases, the term applies to the conversion of a non-residential uses to a residential use.

Adjacent when considering potential impact on cultural heritage resources means sites that are contiguous; sites that are directly opposite a cultural heritage resource separated by a laneway, easement, right-of-way, or street; or sites upon which a proposed development or site alteration has the potential to impact identified visual character, streetscapes or public views as defined within a statement explaining the cultural heritage value or interest of a cultural heritage resource.

Affordable housing means either one of the following:

1. In the case of ownership housing, will mean either one of the following:

- a. Housing for which the purchase price results in annual accommodation costs which do not exceed 30 percent of gross annual household income for low and moderate income households; or
 - b. Housing for which the purchase price is at least 10 percent below the average purchase price of a comparable resale unit in the City of London;
2. In the case of rental housing, will mean either one of the following:
 - a. A unit for which the rent does not exceed 30 percent of gross annual household income for low and moderate income households; or
 - b. A unit for which the rent is at or below the average market rent of a unit in the City of London.

Aging in place means the ability for people to continue to live in their neighbourhood through all stages of their life and still be mobile and independent, and experience a quality of life they know and enjoy for their housing needs, community supports, recreation, leisure, social, cultural and spiritual activities in the community.

Biotic factors are living organisms. Within an ecosystem this includes such things as plants and animals.

Brownfield means undeveloped or previously developed properties that may be contaminated. They are usually, but not exclusively, former industrial or commercial properties that may be underutilized, derelict or vacant.

Built-area Boundary describes the built area of the City as of January, 2011. The City Structure Plan shows the Built-area Boundary. The Built-area Boundary is fixed in time for the purposes of implementing and monitoring the City's target for intensification. Residential development occurring within the Built-area Boundary will be considered as intensification for the purposes of meeting the City's intensification target.

why 2011 not 2014 or 2015 update every 5 years

3.1 The Growth Framework

75_ The Growth Framework establishes a plan for shaping growth over the next 20 years.

Figure 1 - Urban Growth Boundary



Figure 4 - Central London



Figure 2 - Built-Area Boundary

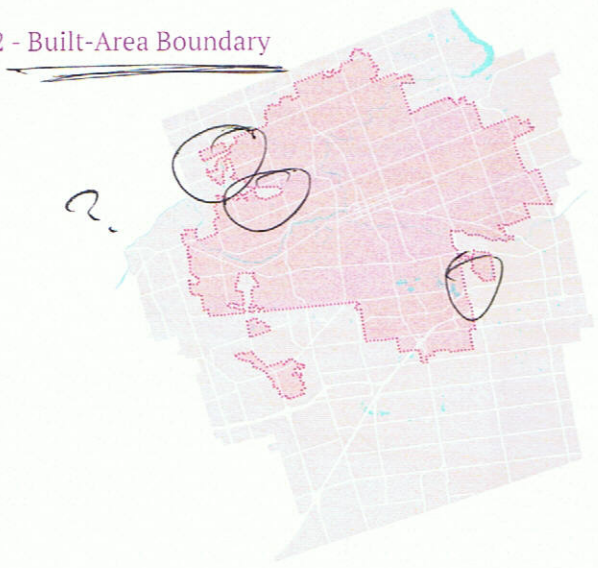


Figure 5 - Downtown, Transit Villages and Rapid Transit Corridors

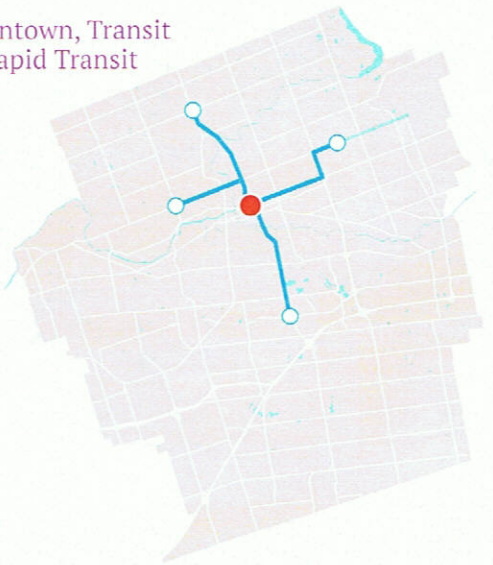


Figure 3 - Primary Transit Area



Figure 6 - Rural-Urban Interface

