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

Attn: Planning & Environment Committee (PEC)

RE: Report regarding Review of Intensification Targets in The London Plan

Minto has an ownership interest in a number of properties along Oxford Street West in the City of London commonly known as Cherryhill Village and Cherryhill Mall. Combined, these properties include a total of 2114 rental apartment units and 160,000 sq. ft of commercial space.

We have just been made aware of the staff report being presented to PEC on Monday December 14th which provides information regarding the City's current and proposed intensification targets.

There are a number of interesting comments included in the staff report as follows:

- Intensification is one of the primary objectives of The London Plan, and ensuring a minimum level of intensification is critical to achieving the Plan's vision to grow the city "inward and upward". (pg.1)
- It is important to understand the role that the development market plays relative to intensification targets. Policy efforts to support intensification cannot be successful if they are fundamentally contrary to long-term market trends. Policies must work within the context of what the housing market is currently demanding and how that demand may shift in the future. (pg. 3)
- The London Plan permits intensification in "appropriate locations and in a way that respects the existing neighbourhoods and represents a good fit". (pg. 5)
- The London Plan includes significant policy support for intensification and infill development within the Built-Area Boundary. (pg. 9)
- Direction #5 in the Our Strategy part of the Plan establishes that building a mixed-use and compact city is important to achieving a number of other goals. (pg. 9)

Cherryhill Village is located within the City's Built-Area Boundary as identified on Figure 1 of the Staff report. It is on a major transit route and is in close proximity to shopping, personal services, medical offices and many other support services. The site is separated from low density areas by significant features, including a railway. It is also a short distance to the Downtown and UWO. In short, Cherryhill Village is strategically placed to help the City meet its intensification targets and should be a focal point for future growth.

We are dismayed therefore to see that the entire Cherryhill complex has not been recognized as a location for intensification and has, rather, been designated as a Neighbourhood Place Type in The London Plan. The Neighbourhood Place Type does not permit apartment buildings in the form that currently exist on the property. In addition to this designation, Cherryhill Village is subject to a 'Remnant High Density Residential' overlay. The staff report states that these overlay designations "represent opportunities for high density development that are not in accordance with the Place Type policies."

We do not understand why these properties have been identified as being unsuitable for intensification, but rather have been grouped-in with a designation that has been classified as a "potential threat" to the City achieving its intensification targets. In fact, this seems counter intuitive to other statements in the report as noted above where intensification along transit routes within the Built-Area boundary is being encouraged. Cherryhill Village meets these criteria, and sites such as it should be designated in a manner encouraging their development as a full featured, mixed use area, not discouraged.

We have previously submitted comments, through our planning consultants MHBC, pertaining to Draft #2 of The London Plan, expressing concerns with the Remnant High Density Residential overlay. We remain concerned that properties such as Cherryhill Village and other high density residential sites have not been identified as intensification areas in order to encourage further redevelopment and investment.

In our opinion, there needs to be a 're-think' of the approach being taken in The London Plan such that existing high density residential developments are recognized as valuable contributors to the City's future growth and development.

Minto has a strong history of partnering with cities in order to develop communities for all stakeholders' benefit. We would be pleased to discuss with the City how Cherryhill Village can contribute to the City's transit-oriented growth objectives.

Yours truly,

Minto Properties

Ben Mullen
Vice President, Asset Management

Cc: Carol Wiebe, MHBC
Andrew Jeanrie, Bennett Jones LLP