

KITCHENER WOODBRIDGE LONDON KINGSTON BARRIE BURLINGTON

April 11, 2016

City of London Planning Division 204/206 Dundas Street London, ON N6A 1G7

Attention: Heather McNeely, Senior Planner

Long Range Planning and Research

Dear Ms. McNeely:

RE: 'The London Plan' (File O-7398) – Second Draft

1705823 Ontario Ltd - 556 Wonderland Rd N, Our File: 1094AN

MHBC has been retained by 1705823 Ontario Ltd to evaluate the policy direction and provisions associated with the proposed Official Plan ('The London Plan'). We wish to provide comments regarding the second draft of the Plan (June 2015) for the property addressed as **556 Wonderland Rd N.** The site is located in the northwest part of London and it integrates a self-storage facility.

Planning Permissions (Existing and Proposed)

The northern portion of the subject lands is designated 'Low Density Residential' and the southern portion is designated 'Multi-Family High Density Residential' in the existing Official Plan. The Low Density Residential designation permits primarily low density uses such as single detached, semi-detached and duplex dwellings. Multiple-attached dwellings, such as row houses or cluster houses may also be permitted. Within the 'Low Density Residential' designation development will normally not be greater than 4 storeys in height and will be a maximum of 30 units per hectare.

The Multi-family High Density Residential designation permits low and high rise apartment buildings as well as multiple-attached dwellings. Excluding provisions for bonusing, density is normally less than 150 units per hectare. As-of-right density bonusing shall not exceed 25%.

An Official Plan Amendment (OPA) in June 2007 amended the Official Plan to add 'self-storage establishment' as a permitted use on the subject lands while maintaining the existing land use designations on 'Schedule A – Land Use' of the Official Plan. Further, the subject lands are zoned Restricted Service Commercial (RSC-4) which permits a self-storage complex use and a portion of the subject lands are zoned Open Space (OS4).

The second draft of the London Plan designates the property as '**Neighbourhoods'** Place Type on 'Map 1 – Place Types' with Wonderland Road (lot frontage) classified as an 'Urban Thoroughfare' on 'Map 3 – Street Classifications'. Table 12 of the draft London Plan specifies that a range of residential uses are

permitted on sites with these attributes, including single detached, semi-detached, duplex, townhouses, stacked townhouses and low-rise apartments. Further, Table 13 prescribes that the maximum height for building forms on the subject property will be 4 storeys or 6 storeys with bonusing. Additionally, Table 14 permits the subject site to have 200 square metres of office space because of its location along an 'Urban Thoroughfare'.

Commentary

Based upon our review of the policy structure and permissions of the second draft of The London Plan, we have identified the following concerns relative to the subject lands:

- 1. We would like confirmation that a self-storage complex use is permitted on the subject lands. While the subject lands abut residential neighbourhoods to the north, south and west of the subject lands, the property is a separate parcel with direct access onto Wonderland Road North. It is our opinion that because the existing self-storage complex use is permitted in the existing Official Plan and this should be carried forward. Policy 863 (3) states that non-residential uses may be permitted when it is demonstrated that the development can fit well into the neighbourhood context. We would like clarification that the existing self-storage complex is a permitted use on the subject lands.
- 2. Should the London Plan be approved in its current form, the zoning for the site would need to be updated to reflect the limited commercial permissions discussed above (as discussed in Policy 32). Accordingly, we anticipate that the status of the existing self-storage complex would be relegated from a permitted use to a legal non-conforming use following the City's Zoning Bylaw update. No rationale has been provided for removing the existing commercial permissions benefitting this property.

In light of these considerations, we would like confirmation that the existing storage complex use is permitted to exist, expand or redevelop on the site located at 556 Wonderland Road North. Otherwise, we would recommend a designation that would permit this type of use.

We thank you for the opportunity to provide comments on Draft Two of 'The London Plan'. We trust that ongoing discussions and dialogue will be available to address the issues noted above. We reserve the right to raise additional issues and provide further comments on the Draft Plan as the review process moves forward.

Yours truly,

MHBC

Carol M. Wiebe Partner

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Scott Allen, MA, RPP Associate

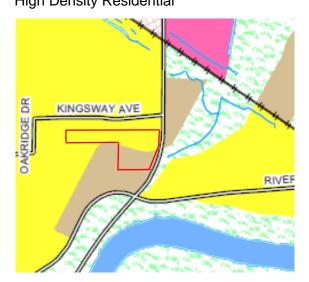
cc. Ali Soufan, York Developments

Address: 556 Wonderland Road North

Ownership: 1705823 Ont. Ltd. Our File No.: 1094 'AN' (Site 13)



Existing Official Plan Designation: Low Density Residential, Multi-family High Density Residential

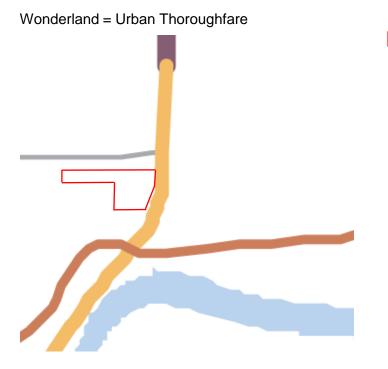


Proposed London Plan Designation:

Neighbourhoods



Street Classification:



Subject Lands