

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
Ridout and Kent Block Inc. - 550 Ridout Street North, Our File: 1094X

MHBC has been retained by Ridout and Kent Block Inc. 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 550 Ridout Street. This site is located in the City's downtown core and it integrates a three storey, low-rise apartment building.

Planning Permissions (Existing and Proposed)

The properties are currently designated '**Multi-family High Density Residential**' on 'Schedule A – Land Use' of the City's Official Plan. Permitted uses within this designation include low-rise and high-rise apartment buildings apartment hotels and multiple-attached dwellings. Within this designation, excluding provisions for bonusing, the maximum density is 150 units and as-of-right density bonusing shall not exceed 25%. Additionally, the lands are zoned 'Residential 10 (R-10)', which permits a similar range of uses.

The second draft of The London Plan identifies the properties as '**Neighbourhoods**' on 'Map 1 - Place Types' and has frontage onto Ridout Street (lot frontage) which is classified as a 'Neighbourhood Connector' and Kent Street which is classified as a 'Neighbourhood Street' on 'Map 3 – Street Classifications' of the London Plan. The permitted uses for a site with these attributes include single detached, semi-detached, duplexes, triplexes, fourplexes, townhouses, stacked townhouses and low rise apartments. The permitted scale is a maximum height of 4 storeys for properties in Central London such as the subject property.

The subject lands are also located within the **Remnant High Density Residential** overlay identified on 'Map 2' of the London Plan. This overlay is intended to recognize existing properties with high density residential designation.

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. As per policies 880-884, residential development on properties that fall within 'Remnant High Density Residential' may be permitted up to develop up to 12 storeys in height and at a density of up to 150 units per hectare. Further, type 2 Bonus Zoning, will be discouraged for these properties. Development within the Remnant High Density Residential Designation will be monitored and this overlay will be evaluated every five years. Over the long term, this overlay may be removed from the Plan such that only the underlying place type policies will apply, which in the case of the subject lands is 'Neighbourhoods'. This is of particular concern because these properties represent investment opportunities for our client and there is uncertainty regarding future permissions of these lands.
2. The 'Neighbourhoods' designation and its permissions reflect the historic use of the site located at 550 Ridout Street, which is a low-rise (three storey) apartment building. The boundary for the 'Downtown' designation is located immediately to the south of the subject lands. The site is located at an intersection within Central London and is adjacent to high-density uses therefore the 'Neighbourhoods' designation is not reflective of the surrounding land uses.

In light of these considerations, we are not supportive of the 'Neighbourhoods' Place Type or the Remnant High Density Residential' overlay for 550 Ridout as it results in a loss of development permissions and would only permit lower density residential uses than what is currently permitted in the Official Plan. In summary, we recommend that the designation for the site should be 'Downtown' or another designation that would permit higher density uses. A Place Type that provides permissions for higher intensity uses would be more appropriate.

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



Scott Allen, MA, RPP
Associate

cc. Ali Soufan, York Developments

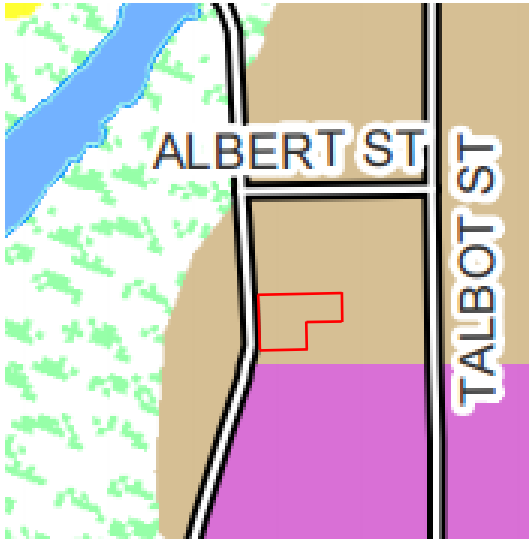
Address: 550 Ridout Street North

Ownership: Ridout and Kent Block Inc.

Our File No.: 1094'X' (Site 36)

Existing Official Plan Designation:

Multi-family High Density Residential



Proposed London Plan Designation:

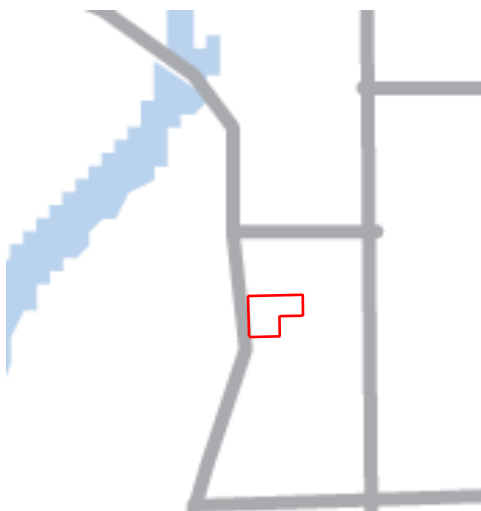
Neighbourhoods (Within Central London)
Remnant High Density Residential



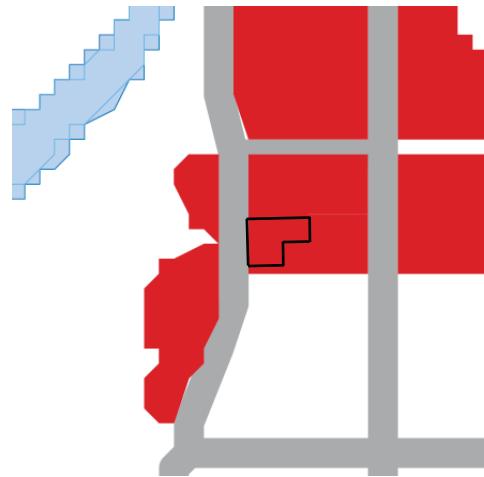
Street Classification:

Kent = Neighbourhood Street (Frontage)

Ridout = Neighbourhood Connector



Remnant High Density Residential



 Subject Lands