



June 9, 2016

File No: 11054.10

City Clerk's Office
300 Dufferin Avenue, Room 308
P.O. Box 5035
London, ON N6A 4L9

Attention: Ms. Heather Lysynski
Committee Secretary, City Clerk's Office

**Re: The London Plan (File No. O-7938)
Public Participation Meeting (June 13, 2016)
Comments respecting 560 and 562 Wellington Street
Auburn Developments Inc.**

Dear Ms. Lysynski:

We are the planning consultants to Auburn Developments Inc., owners of 560 and 562 Wellington Street (herein referred to as the "site"). The site is approximately 0.22 hectares (0.54 acres) in size and has frontage on Wellington Street and Wolfe Street. It lies immediately east of Victoria Park within in the West Woodfield neighbourhood, and is north of Centennial Hall, City Hall and the boundary of Downtown London. The site is currently occupied by a 5-storey office building and a 2-storey office building.

Auburn Developments submitted applications for an Official Plan Amendment and Zoning By-law Amendment for the site in November 2014. The applications would facilitate a high rise, mixed-use development on the site with ground floor commercial uses and residential units on the upper storeys. Public consultations were held in April 2015. The applications remain active at this time.

On behalf of Auburn Developments, we reviewed the 1st and 2nd drafts of The London Plan and submitted comments on the draft versions regarding the site in November 2014 and June 2015, respectively. On the whole, we continue to support the final version of The London Plan for its vision of reinvesting in Central London and encouraging transit, mixed-use and higher densities. Our comments on the May 2016 final version of The London Plan specifically relate to the geographical distribution of height and density within the Downtown and Central London in relation to Auburn's site and the missed opportunity of better capitalizing on the park, rapid transit, and downtown activities that converge around the site.

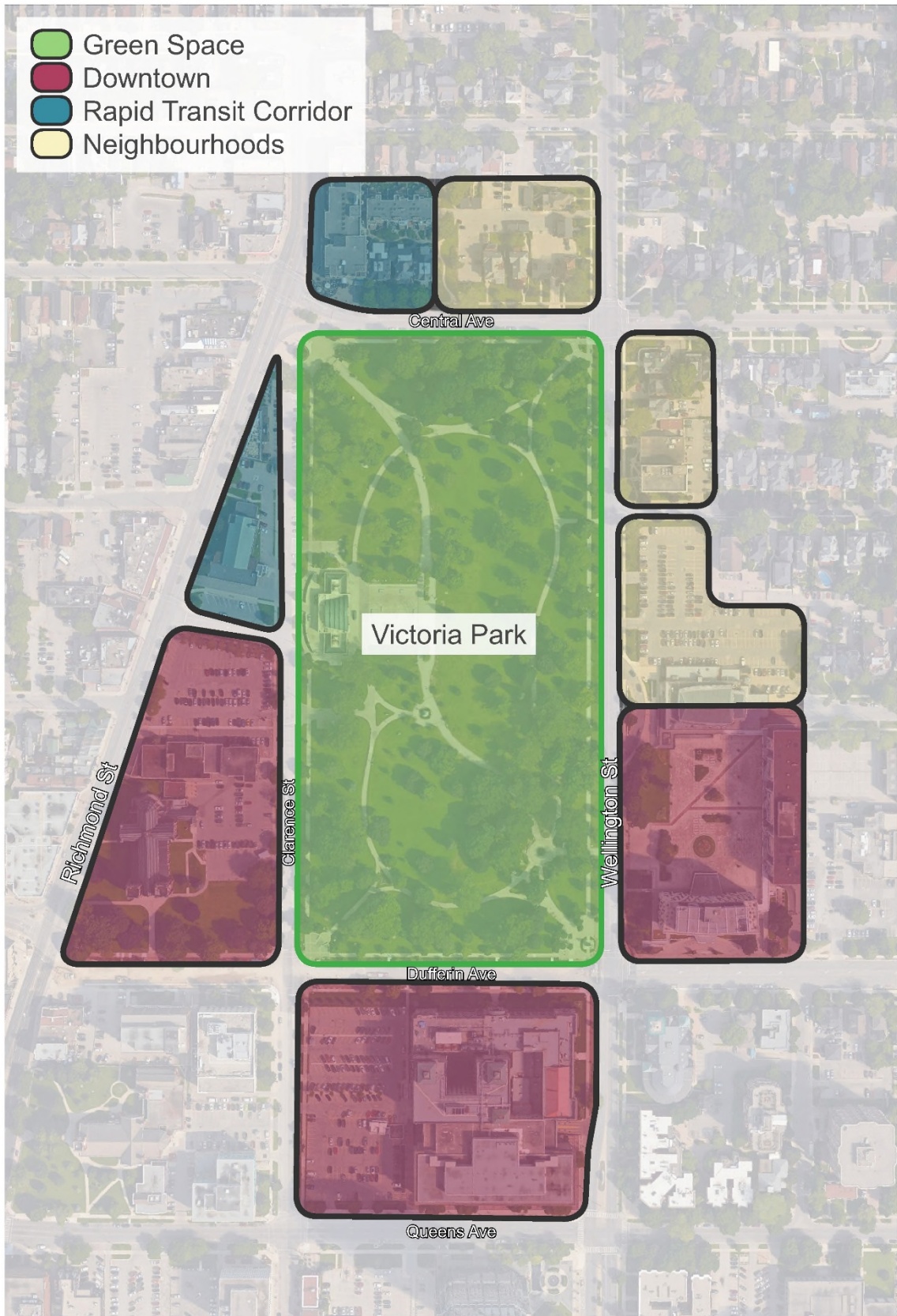
Our comments on the 1st Draft related principally to the site's designation in the "Neighbourhoods" Place Type, a lower order, lower intensity designation that does not recognize the prominent locational characteristics of the site in the context of Richmond Street, Wellington Street, Victoria Park, Central London, and, particularly, Downtown London. It was our opinion that the proposed maximum height permission of the Neighbourhoods Place Type for the site did not appropriately reflect the locational characteristics that make the site ideal for intensification. Further to our comments, the maximum heights did not change from the 1st Draft, but rather the matter was indicated to be dealt with through the application process per the response table to public comments on the 1st Draft.

Our comments on the 2nd Draft again related to the site's designation in the "Neighbourhoods" Place Type, concerning the lack of recognition of the locational characteristics of the site, per the above. Specifically, we requested consideration of a Special Policy Area for the site that captures permissions for higher rise, higher density residential development in keeping with the site's prominence. Further to these comments, the site remains in the "Neighbourhoods" Place Type with the same maximum height permissions. At the time of writing this letter, a response table to the public comments on the 2nd Draft has not been posted online.

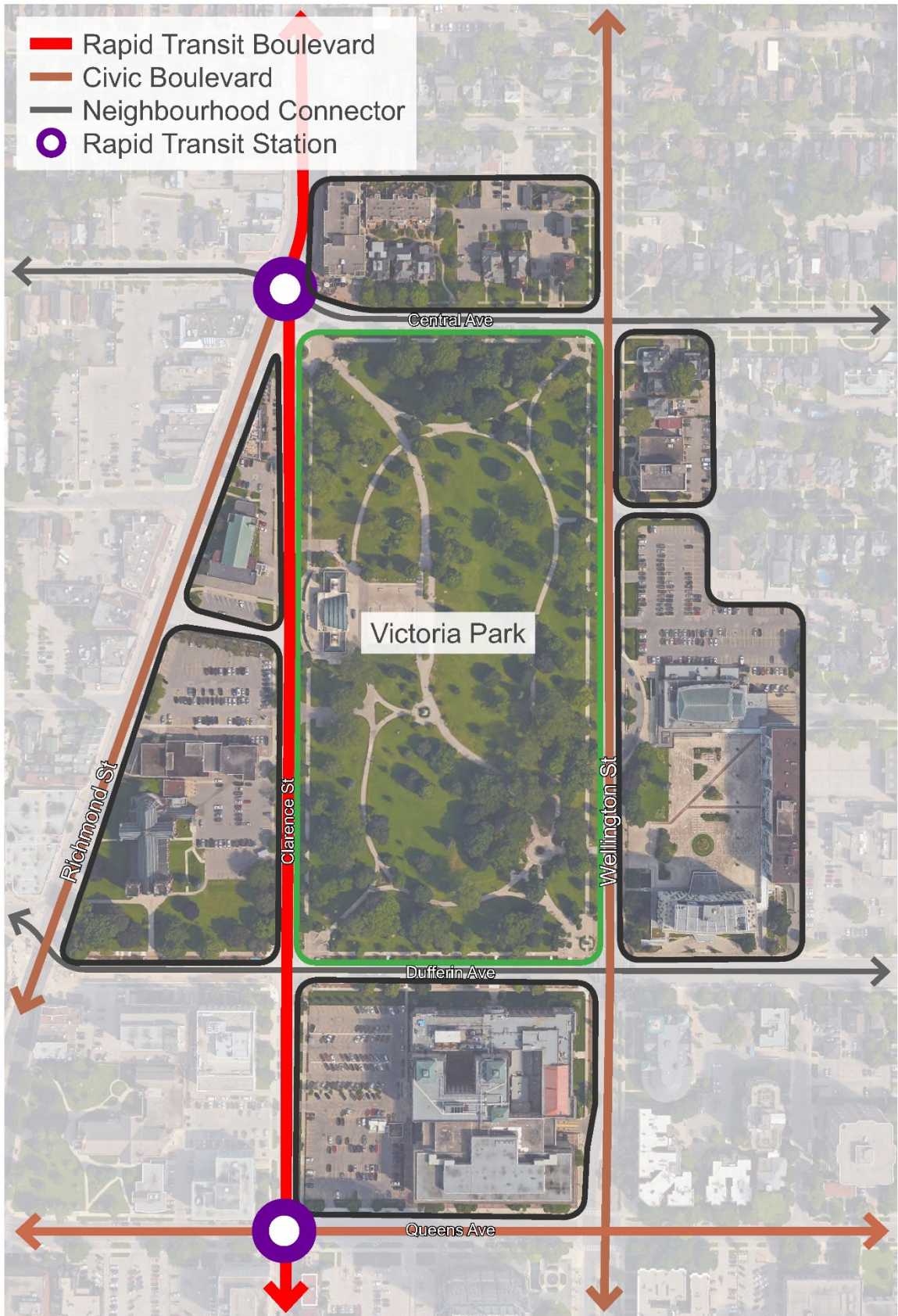
In the May 2016 final version of The London Plan, the site and the Wellington Street corridor remains designated under the "Neighbourhoods" Place Type. We feel that this Place Type fails to recognize the prominence of the area along Wellington Street north of Downtown and the area immediately surrounding Victoria Park in the context of the overall planning hierarchy. Specifically, we feel it fails to:

- Recognize the transition from the "Downtown" Place Type (and "Rapid Transit Corridor" Place Type) into the neighbourhood in terms of development intensity, height, and form, similar to the transition accommodating in other directions from Downtown London;
- Recognize the proximity to future rapid transit routes along Richmond Street and Clarence Street within a short walking distance, and accommodating intensification opportunities that are consistent with the general transit-supportive and urban regeneration policies within Central London;
- Capitalize on the opportunity to more appropriately improve and animate the built edges of Victoria Park, which lies between various higher order Place Types within the planning hierarchy; and,
- Reflect the prominence of Wellington Street as a higher order "Civic Boulevard" in terms of function and more intense development, as is the case with other Civic Boulevards throughout the city.

Prominence of the area in the Place Type hierarchy within The London Plan (May 2016)



Prominence of the area in the transportation hierarchy within The London Plan (May 2016)

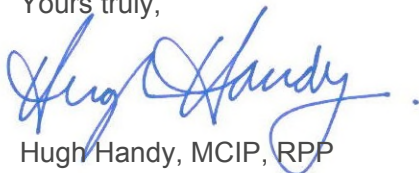


The higher-order prominence of this location and the above land use planning and transportation factors merits a consistent approach for a more intense form of development along the Wellington Street corridor that more appropriately frames and animates Victoria Park, supports Downtown London and its employment and shopping activities, supports transit use along the Richmond/Clarence transit route, and provides transitions from Downtown London into the West Woodfield neighbourhood. Redevelopment and intensification in such prominent locations is consistent with The London Plan broad goal of accommodating “*strategic ways to accommodate development to improve our environment, support local businesses, enhance our physical and social health, and create dynamic, lively, and engaging places to live*” (s.904_13).

Accordingly, Auburn is seeking a change in the Place Type for the Wellington Street corridor north of Downtown to a more suitable Place Type that captures the above considerations (such as “Urban Corridor”) together with a “Special Policy Area” that recognizes the prominence of the location, the changing character of the corridor, corresponding increased maximum building heights, and context-appropriate considerations in relation to compatibility and fit with the Victoria Park and West Woodfield neighbourhood interface. For this reason, Auburn respectfully requests that the May 2016 version of The London Plan not be adopted at this time, or alternatively any decisions affecting the land considered by our comments be deferred, allowing further time for Auburn to dialogue with City Staff on the above request.

On behalf of our client, we thank you for your consideration of our comments. Please ensure that we are notified of any future public meetings or decisions made with respect to The London Plan. Should you have any questions or wish to discuss, please do not hesitate to contact me.

Yours truly,

A handwritten signature in blue ink that reads "Hugh Handy". The signature is fluid and cursive, with a period at the end.

Hugh Handy, MCIP, RPP
Associate, Planner
GSP Group Inc.

cc S. Stapleton, Auburn Developments Inc.
K. Muir, GSP Group Inc.
G. Barrett, City of London Planning Division
S. Galloway, City of London Planning Division
J. Adema, City of London Planning Division