

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
Richmond Corporate Centre -291, 297, 303, 305 Richmond Street
Our File: 1094AE**

MHBC has been retained by Richmond Corporate Centre 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 **291, 297, 303, 305 Richmond Street**. The subject lands are located immediately south of the downtown area.

Planning Permissions (Existing and Proposed)

The subject lands are designated '**Office Area**' which permits offices within purpose-designed office buildings, and buildings converted for office use as well as a range of secondary uses including eat-in restaurants, financial institutions, personal services and clinics. Development within this designation is generally low to medium rise in height and of a scale that will minimize impacts on and integrate with surrounding land uses. The subject site is zoned Office Zone (O8) which permits a similar range of uses.

The London Plan designates the subject lands as '**Neighbourhoods**' on 'Map 1 – Place Types' and Richmond Street is identified as a Neighbourhood Connector and Horton (lot frontage) is identified as a Civic Boulevard on 'Map 3 – Street Classifications'. Permitted uses as per Table 12 include single detached, semi-detached, duplexes, townhouses, stacked townhouses, low-rise apartments, and mixed use buildings. The maximum permitted height for a site with these attributes is 4 storeys or 6 storeys with bonusing. Additionally, as per Table 14, up to 200square metres of retail, service and office space at the intersection.

Commentary

1. The proposed 'Neighbourhoods' designation does not align with the existing Official Plan 'Office Area' designation or the existing commercial plaza. The 'Office Area' designation in the current

Official Plan permits a variety of commercial uses including the existing uses. These uses would no longer be permitted under the 'Neighbourhoods' designation of the London Plan. Should The London Plan be approved in its current form, the zoning for the site would need to be updated to reflect the limited residential permissions discussed above (as discussed in Policy 32). Accordingly, we anticipate that the status of the existing commercial plaza would be relegated from a permitted use to a legal non-conforming use following the City's Zoning By-law update. **No rationale has been provided for removing the office permissions benefitting this property.**

2. While 200 square metres of retail, service and office is permitted, this is limited in scale and less than what currently exists on the site. The site is located on a main arterial, at an intersection and is commercial in nature and surrounded by other commercial uses and some light industrial uses further to the west.

In summary, we are not supportive of the 'Neighbourhoods' Place Type for the subject site. We recommend a Place Type that permits and encourages commercial development including the existing uses. The locational context of the site is important to consider.

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

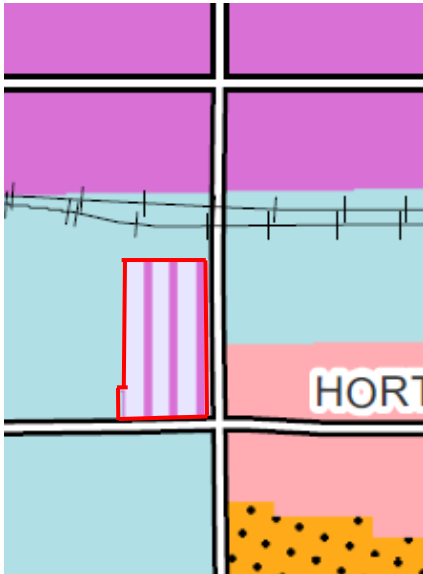
cc. *Ali Soufan, York Developments*

Address: 291,297,303, and 305 Richmond Street

Ownership: Richmond Corporate Center
Our File No.:1094'AE' (Site 30)

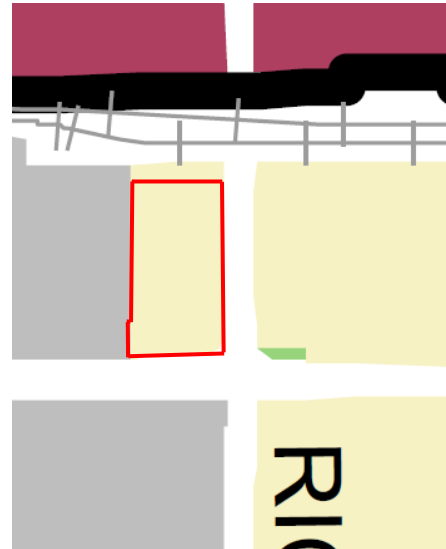
Existing Official Plan Designation:

Office Area



Proposed London Plan Designation:

Neighbourhoods



Street Classification:

Richmond = Neighbourhood Connector
Horton = Civic Boulevard (frontage)

 Subject Lands

