

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
1803244 Ontario Ltd. / 2213916 Ontario Ltd. –205 Horton Street East and 204 Simcoe
Street, Our File: 1094AQ**

MHBC has been retained by 1510203 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 properties addressed as **205 Horton Street East and 204 Simcoe Street**. These properties are located immediately south of the downtown core on the southwest corner of Horton and Clarence and contain an existing commercial centre.

Planning Permissions (Existing and Proposed)

We have organized our comments into the following two main components:

- 1) 205 Horton Street East
- 2) The parcel at 204 Simcoe Street

205 Horton Street East

The subject lands are currently designated as '**Main Street Commercial Corridor**' in the existing City of London Official Plan which permits commercial uses including but not limited to, small-scale retail, service and repair establishments, food stores, convenience commercial uses, personal and business services, pharmacies, restaurants and financial institutions. The subject lands are zoned Residential 7 (R7), Residential 9 (R9) as well as Arterial Commercial (AC4) which permit a similar range of uses as well as higher density residential uses.

The second draft of the London Plan designates the project site '**Neighbourhoods**' on 'Map 1 – Place Types' with Clarence Street (lot frontage) identified as a 'Neighbourhood Street' and Horton Street classified as a 'Civic Boulevard' on 'Map 3 – Street Classifications'. Table 13 identifies a limited range of

permitted residential uses including single detached, semi detached and duplex dwellings. As per Table 13, the maximum permitted height is 2.5 storeys.

Commentary

1. The existing Official Plan designation 'Main Street Commercial Corridor' permits a range of commercial uses including the existing uses. The 'Neighbourhoods' designation under the London Plan does not permit any commercial uses on this site, including the existing commercial plaza. 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 commercial permissions benefitting this property.**
2. In our opinion, the existing permissions should at a minimum be carried forward into the London Plan. It is important to note that the subject lands are located within close walking distance of the proposed Rapid Transit Route along Wellington Road South and in very close proximity to properties designated 'Rapid Transit Corridor' in the London Plan. The 'Rapid Transit Corridor' designation permits a range of residential, retail, service, office, cultural, recreational and institutional uses and heights up to 15 storeys with Type 2 bonusing. It is our opinion that this designation would be appropriate for this site to permit a broad range of uses.
3. The subject lands are located within convenient walking distance of the proposed rapid transit route along Wellington Road South and also in close proximity to properties in the 'Rapid Transit Corridor' Place Type. This Place Type permits a range of residential, retail, service, office, cultural, recreational and institutional uses and building heights up to 15 storeys with Type 2 bonusing. In our opinion, there is planning merit to support the extension of the 'Rapid Transit Corridor' westerly to include this site.

204 Simcoe Street

The subject lands are designated '**Multi-family Medium Density Residential**' in the existing London Official Plan. This permits multiple-attached dwellings, such as row houses or cluster houses and low-rise apartment buildings. Under the 'Multi-family Medium Density' designation the permitted height will normally will not exceed 4 storeys or density of 75 units per hectare. Intensification may be permitted up to 100 units per hectare.

The subject lands are designated '**Neighbourhoods**' in the London Plan, however, Simcoe is a Neighbourhood Street and therefore as per Table 12, primarily low density uses are permitted including single detached, semi detached and duplexes. Further, Table 13 prescribes that built forms should be a maximum of 2.5 storeys.

Commentary

1. In our opinion, existing medium density permissions should at a minimum be carried over into the new London Plan.
2. The subject lands are located within convenient walking distance of the proposed rapid transit route along Wellington Road South and also in close proximity to properties in the 'Rapid Transit

Corridor' Place Type. This Place Type permits a range of residential, retail, service, office, cultural, recreational and institutional uses and building heights up to 15 storeys with Type 2 bonusing. In our opinion, there is planning merit to support the extension of the 'Rapid Transit Corridor' westerly to include this site.

In light of these considerations, we are not supportive of the 'Neighbourhoods' designation for the aforementioned properties and propose that all of these properties should instead be designated as 'Rapid Transit Corridor.'

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*

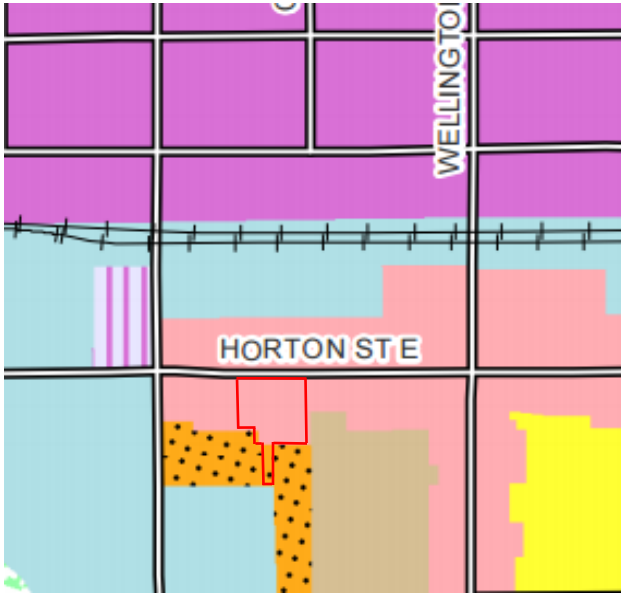
Address: 205 Horton Street and 204 Simcoe Street

Ownership: 1803244 Ont. Ltd./ 2213916 Ont. Ltd

Our File No.: 1094 'AQ' (Site 3)

Existing Official Plan Designation:

Main Street Commercial Corridor, Multi-family Medium Density Residential



Proposed London Plan Designation:
Neighbourhoods



Street Classification:

Horton west of Clarence = Civic Boulevard

Clarence = Neighbourhood Street

Simcoe = Neighbourhood Street

 Subject Lands

