

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
545 Fanshawe -545 Fanshawe Park Road West,
Our File: 1094L**

MHBC has been retained by 545 Fanshawe 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 **545 Fanshawe Park Road West**. The subject lands are located in the northwest portion of the City and are currently vacant and are planned for future high rise residential development.

Planning Permissions (Existing and Proposed)

The subject lands are designated '**Multi-family High Density Residential**' in the existing 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%. The subject lands are zoned R9-7 (22) which permits a similar range of uses.

The London Plan designates the properties as '**Neighbourhoods**'. The subject lands are located on north side of Fanshawe Park Road West, just east of Wonderland Road. As per 'Map 3 – Street Classifications', Fanshawe Park Road is identified as an Urban Thoroughfare. As per Table 12, permitted uses include a range of residential uses including single detached, semi-detached, duplex, townhouses, stacked townhouses and low-rise apartments. As per Table 13, the maximum permitted height is 4 storeys or 6 storeys with bonusing. Further, up to 200 square m of retail, service, office space is permitted as per Table 14 because of the sites location on an Urban Thoroughfare.

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.

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.

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. The existing Official Plan designation 'Multi-family High Density Residential' permits a range of higher density residential uses, including the proposed high-rise apartment buildings. The proposed 'Neighbourhoods' designation does not permit high-density residential uses on this site. 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). **No rationale has been providing for removing the high-density residential permissions benefitting this property.**
2. 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.
3. The 'Neighbourhoods' Place Type and its permissions do not reflect the proposed use of the site. The site is located at an intersection within north London adjacent to a shopping area. The 'Neighbourhoods' Place Type represents a loss of development permissions on this site. It is our opinion that the site is appropriate for higher density uses, or at a minimum the proposed high-density residential uses.

In light of these considerations, we are not supportive of the 'Neighbourhoods' Place Type being applied to 545 Fanshawe Park Road West as it will result in a loss of development permissions. As an alternative, we recommend that the designation for the site should be another Place Type that would permit higher density uses or at a minimum the proposed high-density residential uses similar to those permissions of the existing 'Multi-family High Density Residential' designation in the Official Plan.

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

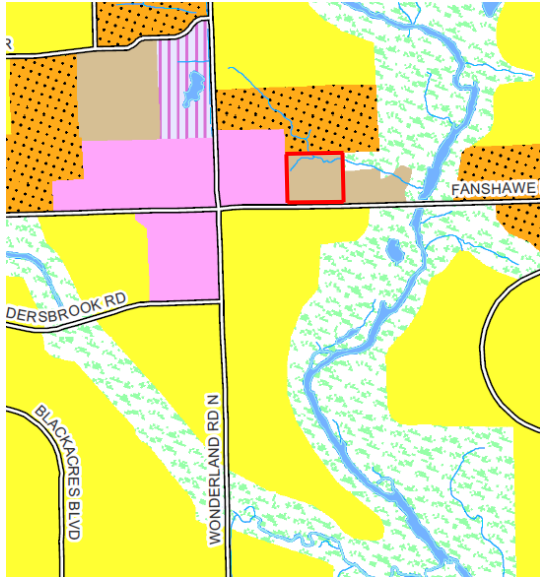
cc. *Ali Soufan, York Developments*

Address: 545 Fanshawe Park Road

Ownership: 545 Fanshawe
Our File No.: 1094'L' (Site 9)

Existing Official Plan Designation:

Multi-family High Density Residential



Proposed London Plan Designation:

Neighbourhoods
Remnant High Density Residential



 Subject Lands

Street Classification:

Fanshawe = Urban Thoroughfare



Remnant High Density Residential

