

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
1551733 Ontario Ltd - 598-608 Springbank Drive
Our File: 1094M

MHBC has been retained by 1551733 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 properties addressed as 598-608 Springbank Drive. The subject lands are located in the west portion of the City and are being planned for high density 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%. Additionally, the lands are zoned for medium and higher density residential uses (R5, R7, R9), which permits similar uses to the Official Plan.

The London Plan designates the properties as '**Neighbourhoods**' on 'Map 1 – Place Types'. The subject lands are located on the southwest corner of the intersection of Springbank Drive and Wonderland Road. As per 'Map 3 – Street Classifications', Springbank drive is classified as a Civic Boulevard and Wonderland is identified as an Urban Thoroughfare. Table 12 of the draft Plan permits uses including single detached, semi-detached, townhouses, stacked townhouses, low-rise apartments, mixed-use buildings, stand-alone retail, service and office uses are permitted on sites with these attributes. Further, Table 13 prescribes that building forms are to have a maximum of 4 storeys or 6 storeys with bonusing. Additionally, because of the sites location at an intersection, up to 2000 square m of retail, service, and office space is permitted.

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. 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 598-608 Springbank Drive, 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

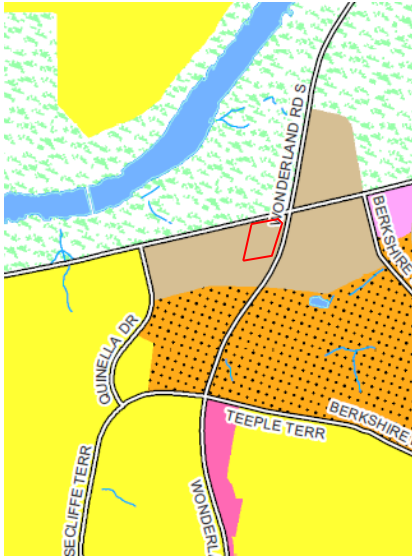


Scott Allen, MA, RPP
Associate

cc. *Ali Soufan, York Developments*

Existing Official Plan Designation:

Multi-family High Density Residential



Proposed London Plan Designation:

Neighbourhoods
Remnant High Density Residential

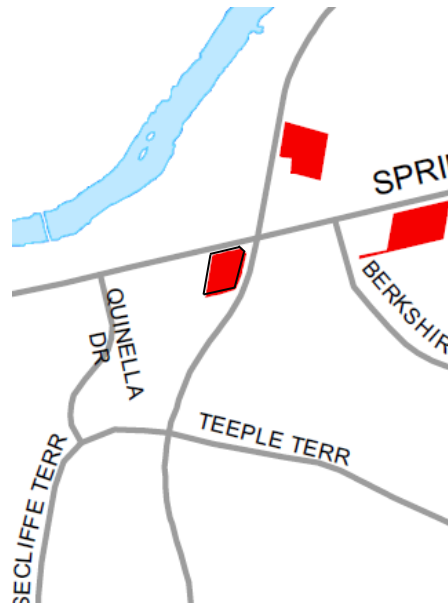


Street Classification:

Springbank = Civic Boulevard
Wonderland = Urban Thoroughfare



Remnant High Density



 Subject Lands