

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
College Avenue Lofts Inc – 193, 195, 197, 199 College Avenue , Our File: 1094T**

MHBC has been retained by College Avenue Lofts Inc. 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 **193, 195, 197 and 199 College Avenue**. The site currently contains three single detached dwellings, and is located north of the Downtown core, east of Richmond Street.

Planning Permissions (Existing and Proposed)

The site is currently designated '**Low Density Residential**', which permits uses including single detached, semi-detached and duplex dwellings. Heights generally do not exceed four storeys and the maximum density is 30 units per hectare. Residential intensification, with the exception of dwelling conversions, will be considered in a range up to 75 units per hectare. Infill housing is permitted in the form of single detached dwellings, semidetached dwellings, attached dwellings, cluster housing and low rise apartments.

The second draft of The London Plan designates the subject lands as '**Neighbourhoods**' on 'Map 1 – Place Types' with College Street (lot frontage) classified as a 'Neighbourhood Street' on 'Map 3 – Street Classifications'. Table 12 specifies that a limited range of residential dwelling types are permitted on sites with these attributes, including single detached, semi-detached and duplex dwellings. Further, Table 13 prescribes that building forms are to have a maximum height of 2.5 storeys.

'Map 6 – Specific Policy Areas' of The London Plan identifies the subject lands as falling within the 'St. George/ Grosvenor Neighbourhood'. Policies 956 and 957 outline permissions for lands in this neighbourhood. It is our understanding that the vision is to remain as a predominantly low density, low-rise residential neighbourhood notwithstanding pressures for redevelopment, expansion and office conversions. Policy 957 identifies that while some areas are appropriate for redevelopment and conversion, any development proposals shall not adversely impact the amenities and character of the

surrounding area. The Plan states that based on the St. George/Grosvenor area study that was conducted, suitable areas for office conversions and medium and high-rise apartment land uses have been identified in this Plan. It is intended that additional areas will not be designated for these uses without a re-evaluation of the area study and a subsequent decision by Council to amend this Plan.

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 permissions in the second draft of the London Plan are less than what is currently permitted in the 'Low Density Residential' designation in the existing Official Plan. Further, The London Plan permits less height than the existing Official Plan and does not provide policies to support infill development on this site.
2. The subject lands are located within convenient walking distance of the proposed rapid transit route along Richmond Street and in very 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.**
3. The subject lands are located directly south of a large institution facility that is six stories in height and occupies the entire city block. There is a diversity of land uses within the immediate area thereby making the subject lands an ideal candidate for suitable infill and intensification in keeping with the surrounding neighbourhood.

In light of these considerations, we are not in support of the 'Neighbourhoods' Place Type for the subject lands located at 193, 195, 197 and 199 College Avenue. In our opinion, a designation that supports redevelopment and intensification opportunities, such as 'Rapid Transit Corridor' would be more appropriate for the site due to its proximity to the proposed Rapid Transit route.

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

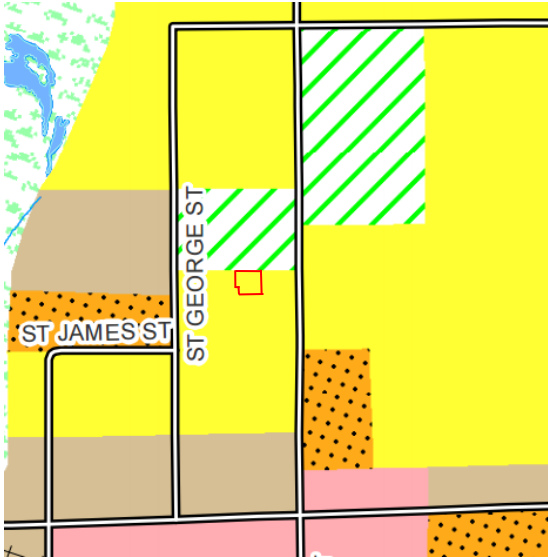


Scott Allen, MA, RPP
Associate

cc. *Ali Soufan, York Developments*

Existing Official Plan Designation:

Low Density Residential



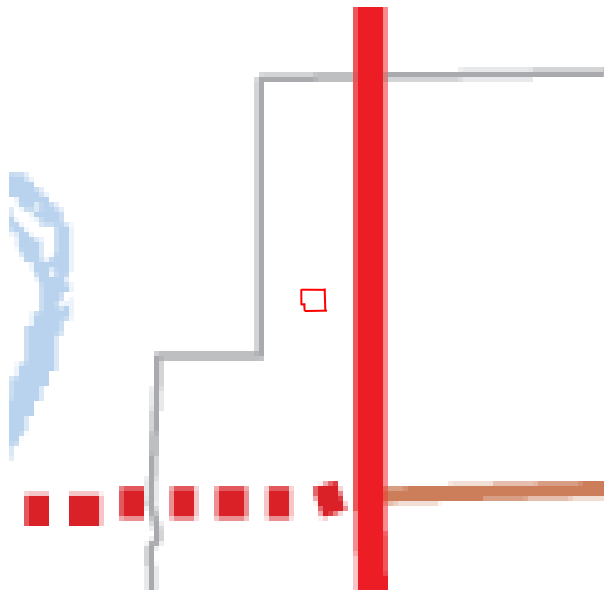
Proposed London Plan Designation:

Neighbourhoods



Street Classification:

College = Neighbourhood Street



Special Policy Area:

42



 Subject Lands