

April 7, 2017

Mr. Lief Maitland
City of London
206 Dundas Street
N6A 4L9

Dear Mr. Maitland,

RE: Official Plan Amendment O-8741
Southwest Area Secondary Plan
Our File: OOP/LON/15-01

On behalf of our client Old Oak Properties, we provide the following comments with respect to the above noted Official Plan Amendment application initiated by the City of London.

Our client is the owner of two vacant, parcels of land designated and zoned for high density residential uses in the southwest area. Prior to the Southwest Area Plan (SWAP) being approved in 2014 these properties had as-of-right policy permissions to construct apartment buildings with any form of parking including surface, underground or structured. Indeed, the existing in-force zoning does not mandate any particular form of on-site parking.

Most large-scale residential buildings outside of the downtown have structured or surface parking. The policy changes proposed through the OPA will result in substantial added costs, placing new buildings at a disadvantage in the market. Furthermore, it will result in higher rents thereby increasing housing costs in the City. We also note that many land uses result in the need for large surface areas. There is no clear policy explanation as to why high-rise residential buildings, office buildings, and mixed use buildings are being singled out.

We believe that a policy that provides more deliberate flexibility in the provision of parking methods to allow the City and the land owner to have regard for site-specific circumstances is preferable. Further a clear policy incentivising land owners, through height and density increases, without the burden of further policy amendments would clearly assist in achieving the broader design goals of urban forms contemplated by the proposed policy.

We further note that The London Plan contains this same policy, which is currently under appeal. It may therefore be premature to approve an Official Plan Amendment to coincide with a document that is not yet in full force and effect and may be subject to change through the pending appeals. As such, we ask that the application be deferred until such time as the London Plan appeals have been fully addressed or so that alternative policy approvals can be explored.

Your consideration to these comments is appreciated.

Yours very truly,

ZELINKA PRIAMO LTD.

Michelle Doornbosch, BA
Associate

cc. Greg Bierbaum, Old Oak Properties