



VIA EMAIL

March 26, 2021

City Planning
City of London
206 Dundas Street
London, ON
N6A 1G7

Attention: Ms. Sonia Wise, Planner

Dear Ms. Wise:

**Re: Draft Masonville Secondary Plan (File O-9881)
Preliminary Comments on Behalf of 1635 Richmond (London) Corp.
1623 & 1631-1649 Richmond Street
London, Ontario
Our File: AVL/LON/20-01**

We are the planning consultants for 1635 Richmond (London) Corp (“RLC”) as it relates to the City of London Masonville Secondary Plan process. RLC is the owner of lands within the area subject to the Masonville Secondary Plan, including lands municipally known as 1631-1649, and 1623 Richmond Street. These lands are generally located on the west side of Richmond Street and south of Hillview Boulevard (“RLC Lands”). The lands at 1631-1649 Richmond Street were recently developed with 2, seven storey apartment buildings that are targeted primarily for student housing needs. RLC owns a portion of the lands south of the developed lands (1623 Richmond Street), which are currently developed for single storey residential purposes, and therefore has an interest in this collective planning area on the west side of Richmond Street. The intent of RLC would be to develop these lands in the future consistent with the development on the lands to the north.

On behalf RLC, we have been monitoring the Masonville Secondary Plan. We have reviewed the Draft Secondary Plan dated March, 2021 and the March 1, 2021 Staff Report in the context of the RLC Lands.

Based on our review of the Masonville Secondary Plan:

- Schedule 2: Community Structure identifies the RLC Lands as “Low-Rise” and “Specific Policy Area”;
- Schedule 3: Land Use identifies the RLC Lands as “Transit-Village Mixed Use”;
- Schedule 4: Heights identifies the RLC Lands as “Low-Rise [2-4 Storeys]; and
- Schedule 6: Priority Streets identifies Richmond Street as a “Mixed-use Character Street” where the abode lands have frontage.

We understand that the special policy areas applicable to the RLC Lands relates to policy 10.1 “Richmond Street-Old Masonville” and 10.2 “1643, 1649, 1653 Richmond Street” of the draft Secondary Plan. Based on our review, Policies 10.1 and 10.2 seek to carry through site specific policies that were originally established and implemented in the 1989 Official Plan (OPA 565), and further reflected in the London Plan (Policies 821-825). We

note that the site specific policies applicable to the draft Secondary Plan, are not consistent with recent approvals including OPA 698 to the 1989 Official Plan, and LPA 7 to the London Plan to permit the development at 1631-1649 Richmond Street.

Further to the above, it is prudent to consider these lands as appropriate to accommodate greater density than the current special policy contemplates. The policy area was established within the 1989 Official Plan (pre-London Plan), and since this time significant growth has been projected for the area, culminating in the draft Masonville Secondary Plan. The Masonville Secondary Plan is based upon a Place Type in the London Plan (Transit Village) that seeks to accommodate building heights up to 22 storeys. The Special Policy Area applicable to the RLC Lands is not reflective of the direction intended for the Transit Village place type, and it is appropriate to consider updating the policy framework as part of the Secondary Plan process.

The special policy area recognizes the opportunity that the lands have for accommodating growth, noting “Given the prominent location, it is desirable to increase the net residential density of these lands...” to facilitate transit-supportive development. The southern portions of the RLC Lands remain undeveloped, and according to the existing established policy framework, these lands are permitted to develop as apartment buildings/cluster townhouses, at a maximum density of 150 units per hectare, and maximum height of 4 storeys.

The lands subject to this site specific policy are located along Richmond Street, which is identified as a major artery, where a majority of growth is to be directed. Specifically, we would note draft Policy 2.1 which states:

“The two main transportation corridors of Richmond Street and Fanshawe Park Road intersect in the plan area which forms a major central point of convergence. Lands surrounding this intersection have excellent access to the transit interchange and are well separated from existing lower density neighbourhoods. The most intensive land uses and forms are directed to these arteries to transform the intersection into a vibrant, transit-oriented, mixed-use focal point for the area. New development along these frontages will have active commercial ground floors to create interest and animation along the street and support a walkable main street environment”

The majority of growth is to be directed towards Richmond Street. In our submission, the RLC Lands are appropriate to consider for building heights and at a density in excess of what would currently be permitted by the site specific policy. In particular, the undeveloped lands to the south are, in our opinion, appropriate to consider beyond the 4 storey and 150 unit per hectare maximum that is contemplated by the site specific policy, which predates the Secondary Plan. In our submission, the RLC Lands could be considered for a Mid-Rise development, permitting building heights up to 8 storeys (as currently drafted), which would be consistent with what is approved for the lands to the north (up to 7 storeys). The undeveloped RLC Lands could be developed consistent with what has been constructed already, and contemplated within the Secondary Plan Area at large.

The policy direction provided by the draft Masonville Secondary Plan, in part seeks to ensure compatibility of uses, in particular for intensification in proximity to existing residential areas. This policy direction would provide sufficient direction to ensure any redevelopment of the RLC Lands is appropriate for the existing context.

We will continue to review the Masonville Secondary Plan in more detail, will monitor the implementation, and may provide additional comments as required.

Please kindly ensure that the undersigned is notified of any further meetings or notices related to this matter.

Yours very truly,

ZELINKA PRIAMO LTD.



Rob MacFarlane, MPL, MCIP, RPP
Planner

cc. 1635 Richmond (London) Corp (via email)