



**VIA EMAIL**

October 12, 2021

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

Attention: Ms. Sonia Wise, Planner

Dear Ms. Wise:

**Re: Masonville Secondary Plan (File O-9881) – August 2021 Draft  
Preliminary Comments on Behalf of Rock Developments  
50 North Centre Road  
London, Ontario  
Our File: ROD/LON/20-01**

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We are the planning consultants for Rock Developments as it relates to the City of London Masonville Secondary Plan process. Rock Developments is the owner of lands within the area subject to the Masonville Secondary Plan, including lands municipally known as North Centre Road, and generally located south of Fanshawe Park Road East, and east of North Centre Road (“Rock Lands”). The Rock Lands are built for single storey commercial retail uses and associated parking, and are currently occupied by a variety of uses, including a Jysk, Winners, and Bulk Barn, amongst others.

On behalf of Rock Developments, we have been monitoring the Masonville Secondary Plan. We submitted a comments regarding the Masonville Secondary Plan dated March 23, 2021, and met with Staff on April 6, 2021 to discuss the same. We have reviewed the Draft Secondary Plan dated August, 2021 and the August 30, 2021 Staff Report in the context of the Rock Lands.

Based on our review of the Masonville Secondary Plan:

- Schedule 2: Community Structure identifies the Rock Lands as “Low-Rise” and “Mid-Rise”. A “Future Connection” is identified through the Rock Lands;
- Schedule 3: Land Use identifies the Rock Lands as “Mixed Use”;
- Schedule 4: Heights identifies the Rock Lands as “Mid-Rise [2-8 Storeys]”, and “Low-Rise [2-4 Storeys]” and with a “Future Connection” through the lands;
- Schedule 5: Connections identifies a “Future Connection” through the Rock Lands; and
- Schedule 6: Priority Streets identifies both Rich Fanshawe Park Road East and North Centre Road as “Commercial Character Streets” where they align with the Rock Lands. A “Future Connection” is identified within the Rock Lands.

## **PRELIMINARY COMMENTS ON DRAFT MASONVILLE SECONDARY PLAN**

The Masonville Secondary Plan Area is a Protected Major Transit Station Area, where significant growth through intensification is anticipated. The Secondary Plan seeks to direct growth to this area, while ensuring a transition to existing established neighbourhoods, which surround this node. As outlined in our March 23, 2021 letter, we believe that the Rock lands are appropriately sized so as to accommodate height and densities beyond what the draft policy currently contemplates (being 4 and 8 storeys max). We continue to encourage Staff to consider a less rigid policy framework in terms of height locations, so as to allow appropriate development to be determined at the time of development application. There continue to be draft policies, such as angular plane guidelines, that would direct what scale of development is appropriate through a development application.

We also continue to encourage Staff to consider interim development policies in recognition of the existing uses of the Secondary Plan area, and that realization of the direction provided by the Secondary plan will take years or decades to fully establish. In the interim, it is our opinion that modest expansion or growth is appropriate and should be guided based on market demands.

Further to the above comments, at this time our specific preliminary comments for the Draft Secondary Plan are as follows:

- Draft Policy 3.1.1iv) states that “The provision and construction of connections in Schedule 5 are required where a development parcel front on, is adjacent to, or requires the access of a connection, and shall be determined at the time of planning and development applications such as...”. It is unclear the function of this draft policy, and clarification is sought. It is unclear if the aforementioned policy is intended to identify instances in which new road creation is not necessary to accommodate development, which is an overarching concern of our client. Should this be the intent, we believe clarity is appropriate. Further, it is unclear if an Official Plan Amendment would continue to be required, given the language of draft Policy 7.9, which states, “Substantive changes or eliminations of any road alignments will require an Official Plan Amendment...”;
- Draft Policy 3.1.2ix) requires all new multi-unit residential developments include indoor and outdoor communal amenity spaces. In our submission, flexibility is important for site design and we suggest that “shall” be replaced with “should”;
- Draft Policy 3.1.3.1 would require an easement to be established over every private road in the Secondary Plan area, the purpose of which would allow public access. We seek clarification on the intent and nature of implementing this policy. For instance, who would assume liability of the private road, and could there be instances where it is generally not necessary for the broader public to have access to a public road. We suggest that there may be instances where a public access easement may not be warranted, and suggest that the corresponding policy be more flexible in nature to only pursue easements where deemed appropriate;

- Draft Policy 3.8i) (Formerly 3.7i)) would require a range of housing types to be provided on every site. In our submission, flexibility should be introduced to best respond to market demand;
- Draft Policy 3.8ii) (Formerly 3.7ii)) would require all properties to provide for live-work opportunities. We continue to encourage flexibility so as to best respond to market demand, and in particular considering the proposed cap on employment generating uses by draft Policy 4.1v);
- Draft Policy 3.8iii) (Formerly 3.7iii)) requires a range and mix of unit sizes and types. We continue to encourage flexibility in this Policy to best respond to market demand, and suggest “shall” be replaced with “should”;
- Draft Policy 4.1v) caps office use for the Secondary Plan area at 20,000sq.m. We continue to have concerns with a cap that is plan wide, and wherein a single building could occupy upwards of ¼ of the overall cap. The implementation of a plan-wide cap remains unclear. We suggest the overall cap be removed.
- Draft Policy 4.2.1iii) would restrict any new stand-alone single tenant commercial buildings, whereas we continue to encourage Staff to consider interim development permissions prior to realization of the plan objectives;
- Draft Policy 6.1ii) requires that all buildings express three components including a base, middle and top. It is unclear how these elements are to be transitioned to certain building types, in particular those permitted in the “Low Rise” areas. It may be more appropriate for this draft policy to be specific to certain building types; and
- Draft Policy 6.5iii) (Formerly 5.1iii)) requires buildings and main entrances to be located and oriented towards public streets. We suggest flexibility be introduced to accommodate site specific circumstances, and suggest replacing “shall” with “should”.

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. Rock Developments (via email)