



LONDON DEVELOPMENT INSTITUTE

November 25, 2024

The Minister of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, ON
M7A 2J3

Reference: ERO 019-9334

Dear Minister Calandra

Please accept this letter in relation to the City initiated Official Plan Amendment (OPA) 125 regarding the height permissions within a number of place types in the London Plan as well as some additional Map changes. This letter is focused on the height permissions included in OPA 125.

The London Development Institute (LDI) is a member-based organization representing most land developers in the London area. LDI has been the leading voice on development issues in our city for more than 40 years. Our goal, working with our partners in local government and the community, is to build a better London.

Our organization was fully consulted and engaged by the City of London during the OPA review of the height's permissions in the London Plan.

Our organization supports the changes outlined in the approved OPA 125.

LDI did advocate for some additional changes that were not included. We would ask for your consideration of one change to allow for more housing.

The following request was presented on September 10th, 2024 to the Planning and Environment Committee of the City of London at the statutory public meeting.

Table 11 (Neighbourhood Place Types):

Civic Boulevard and Urban Thoroughfare (Major Streets)

- Change base condition from a maximum of 6 stories to 8 stories on all major streets defined as Civic Boulevard/Urban Thoroughfare in the London Plan

Reasons to support the requested change:

562 Wellington St., Suite 203, London, Ontario, N6A 3R5

tel. (519) 642-4331

www.londondev.ca

londondev@rogers.com



LONDON DEVELOPMENT INSTITUTE

- Restricting building heights to 6 storeys along major streets is leaving a lot of development potential and housing supply on the table, for locations where 7 or 8 storeys could be appropriate. Requiring an OPA, and not just a ZBA, any time an applicant wants more than 6 storeys on a major street will make such proposals very difficult once this new policy is set. If 8 storeys were permitted, as a base condition on major streets, that height would align with the definition of mid-rise at the Official Plan policy level. The zoning by-law can determine where this maximum height is not permitted, either through pre-zoning or through planning applications. But the policy permissions would allow for 8 stories without an OPA.
- Providing for a base condition of 8 stories along all Major Streets will align with the goal of creating a "hierarchy" of building heights. The increase of heights to a maximum of 10 stories at intersections of Major Streets will provide opportunities for a higher intensity of development, at key locations, where it can be supported.
- The change request is also supported in other approved planning policies including the approved Southwest Area Secondary Plan in the London Plan. This secondary plan identifies mid-rise to 9 storeys. In addition, the London Plan definition of High-rise is being above 8 storeys.

We would appreciate if this change could be made.

Finally, our industry has several applications ready to proceed under the new height framework in the OPA. These applications will not move through the approval process until a decision has been made by your Ministry. As an example, one application has over 8000 homes (over a 20-year period) proposed based on the new height provisions.

We would ask that you not take the full allotted time to approve this OPA. It is our understanding that you have up to 120 days to confirm or change the proposed By-law from the City of London. We ask you to approve this OPA as soon as possible.

Thank you for your consideration.

Sincerely,

Mike Wallace
Executive Director