

# PLANNING JUSTIFICATION **REPORT**

931 – 1225 Southdale Road East, London  
ZONING BY-LAW AMENDMENT

Date:

**August 2022**

Prepared for:

**London and Middlesex Community Housing**

Prepared by:

**MacNaughton Hermesen Britton Clarkson Planning Limited**

7050 Weston Road, Suite 230

Woodbridge ON L4L 8G7

T: 905 761 5588

F: 905 761 5589

Our File 0903K

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# 1.0 Introduction

MHBC has been retained by London and Middlesex Community Housing (hereafter referred to as the "the Applicant") to seek approval for a Zoning By-law Amendment (hereafter referred to as "Application") to permit the redevelopment of the lands municipally known as 931-1225 Southdale Road East/551-605 Millbank Drive in the City of London (hereafter referred to as the "Subject Lands" or "the Site"). The Applicant is seeking approval for a Zoning By-law Amendment in order to rezone the Subject Lands and create site-specific definitions and standards to permit the development of the proposed apartment dwellings.

The proposal involves demolishing 68 existing townhouse units and constructing three 6-storey apartments and multiple landscape amenity areas on the portions of the Subject Lands located at the southeast corner of Southdale Road East and Millbank Drive. The Subject Lands measure approximately 4.32 ha in size and have approximately 365 m of frontage on Southdale Road East and 152 m frontage on Millbank Drive. The existing townhouse units presently occupy these lands.

The development proposal represents a density of 64.7 units/ha distributed across three phases via proposing (3) apartment buildings containing 167 affordable apartment units. Vehicular and pedestrian access to the development would build on the existing right of way(s), off of Southdale Road East and Millbank Drive. Access is provided across the Site by way of an internal (private) road system and integrated sidewalks connecting to the parking areas, residential entrances, and on-site amenity areas.

Implementation of the proposed redevelopment requires approval of a Zoning By-law Amendment (ZBA) to add special provisions to the Subject Lands that permit a reduced front yard depth, reduced parking rate, and increased building height. This Planning Justification Report supports the required application and assesses the proposal in the context of the applicable planning framework. The planning merits of this proposal are evaluated in detail in this Report and are summarized below:

- The project supports the development of lands designated for medium-density residential purposes pursuant to the City of London's new Official Plan (the London Plan);
- The property is well-suited for the intended infill use considering; 1) size and density, 2) location at the intersection of a civic boulevard and neighborhood connector, 3) set within an established residential community, 4) proximity to established retail/commercial uses, employment areas, recreational areas, and 4) proximity to public transit routes;
- The proposed redevelopment would help to diversify housing choices and affordable housing options within the community and, more broadly, the City of London. These additional units would also help to promote neighbourhood stability by diversifying the

quantity and mix of housing available in the community (to better meet the changing needs of local residents over the long-term);

- The development proposal represents cutting edge intensification and renewal of aged low-density affordable housing stock, a visionary development in London and an excellent exemplar of gentle intensification and a great precedent for future housing developments;
- Design elements integrated into the proposal promote an attractive site development plus quality architecture that would contribute positively to the local streetscape;
- The proposed development will provide accessible family units that are affordable and will contribute positively to the neighbourhood, improving diversity in housing stock availability.

In light of these considerations, in our opinion, this proposal is appropriate for the Subject Lands and the development context and should not generate negative land use issues with adjacent properties.

## **1.1 Report Framework**

In support of the application, this Report includes:

- An introduction and general description of the Site, surrounding uses and existing conditions; to provide an understanding of the locational and policy context;
- An overview of the proposed redevelopment;
- A description of the overall land use planning and design elements of the proposed redevelopment;
- A review of the applicable policy framework and an assessment of consistency with the Provincial Policy Statement and conformity with the City of London Official Plan (London Plan); and,
- A review of the existing and proposed zoning framework.

The following planning documents were primary references in the preparation of this Report:

- Provincial Policy Statement;
- City of London Official Plan (The London Plan); and
- City of London Zoning By-law Z.-1.

CGS | Curran Gacesa Slote Architects Inc. are the architect of record for the project and has been responsible for the overall coordination of the application. All required reports have been prepared and submitted concurrently with the planning application.

## **1.2 Planning Applications**

Our analysis has confirmed that the following applications are required to permit the proposed project:

**Table 1 - Required Planning Applications**

<b>Planning Application</b>	<b>Approval Authority</b>
<b>Zoning By-law Amendment</b> To apply an R8 Zone to the Site to accommodate the proposed apartment development's use, scale and density, plus special provisions to allow the reduced front yard depth, parking rate, and increased height.	City of London
<b>Site Plan Approval</b>	City of London

A Pre-Application Consultation meeting for this project was held with City of London staff on November 16, 2021. As set out in the associated Record of Pre-Application Consultation, the following reports have been prepared in support of the proposal and are enclosed with the ZBA application:

- Planning Justification Report (AODA);
- Conceptual renderings and site plan for new buildings;
- Engineering submission on servicing capacity;
- Archeological Assessment;
- Zoning Review Data Sheet; and,
- Electronic copies of all supporting background information.

# 2.0 **Site Location & Surrounding Land Uses**

## **2.1 Site Description**

The Site is located in South London at the southeast corner of Southdale Road East and Millbank Drive and is municipally addressed 931-1225 Southdale Road East/551-605 Millbank Drive in London, Ontario. The Site was built in 1970 although it has undergone various site and building renovations throughout the years. The current Subject Lands are aged and in poor condition and currently occupied with a campus of 2-storey cluster townhouses comprised of 166 units. These residential units are presently serviced by surface-level parking lots that are accessed via private laneways. The Site currently has two vehicular access points; one off of Southdale Road East to the north and one off of Millbank Drive to the west.

These lands generally have a rectangular shape, measuring approximately 4.32 ha in area with approximately 365 m of frontage on Southdale Road East, and 152 m of frontage on Millbank Drive. The Site is in a relatively flat condition.

The Site is currently serviced by the existing municipal sanitary sewer and watermain on Southdale Road.

The Subject Lands are located entirely within the City of London's Urban Growth Boundary and form part of the Westminster Planning District. The London Plan policies for the Site are those of a Neighbourhoods Place Type at the intersection of a civic boulevard and neighbourhood connector. These policies permit low-rise apartment buildings up to 4-storeys with bonusing up to 6 storeys and mixed-use element permission up to 200 sq. m including small-scale community and commercial community facilities. As such, the proposal appears in keeping with the policies which are outlined later in this Report.

**Figure 1** of this Report illustrates the location of the Subject Lands.

## **2.2 Surrounding Land Uses**

The development area surrounding the Site is largely established as a residential community containing a variety of low-rise residential forms, open spaces, and recreational facilities with some retail/service commercial activities to the west of the Subject Lands, including the shopping area at Adelaide Street South intersection. The surrounding development context is described in detail below.

The Subject Lands are located within convenient walking distance of the existing transportation, public transit and active transportation networks, including:

- Southdale Road East and Millbank Drive, which are classified as Civic Boulevard and Neighborhood Connector pursuant to Map 3 (Street Classifications) of the London Plan;

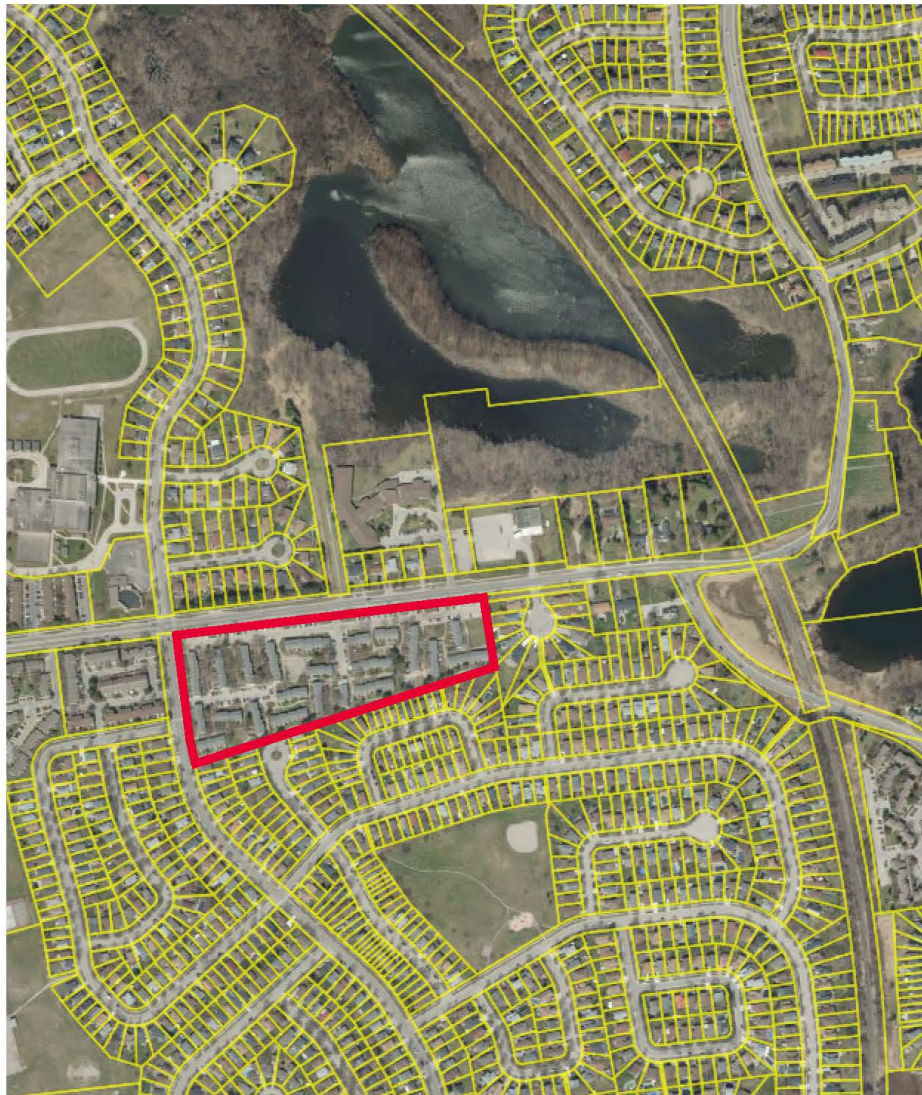
- London Transit Commission (LTC) bus service operates route 14 along the Southdale Road East corridor and connects the Subject Lands to the planned rapid transit corridor to the west along Wellington Street. Proximate to the Site, transit service operates route 13A along the Millbank Drive corridors. Route 13A is a local bus service operating through Westminster District and providing access to the surrounding parks and recreational facilities; and
- A well-connected public sidewalk network along Millbank Drive and Southdale Road East and the overall sidewalk system provided within Westminster and adjacent neighbourhoods.

The Site is currently surrounded by the following uses:

- NORTH:** Immediately to the north, across Southdale Road East, there is a variety of uses ranging from a combination of low-rise and medium-density residential and commercial buildings to two places of worship, a Long Term Care Facility, and a school.
- EAST:** Various low-rise, medium-density residential buildings occupy lands directly to the east. Further east of these lands is Pond Mills pond and recreational-educational facilities.
- SOUTH:** Immediately to the south are low-rise low-density residential units. Further south is Heritage Park.
- WEST:** Immediately to the west, west of Millbank Drive, are townhouse dwellings. Further west, there are institutional and community service uses, including two school sites, Westminster Park, and a public pool.

A 1000-meter context map has been prepared to illustrate existing and planned land use, built form, community interest point, and mobility network within a 10-minute walking distance surrounding the Site. (refer to **Figure 2** of this Report). As shown on the map, this area has a wide variety of uses. The property is located within walking distance of multiple community services, parks, recreational, and institutional uses. The area's overall built form and character is typically medium-density residential along Southdale Road East, with low-density residential located further north and south. Significant features in proximity to the Site are Pond Mills, Westminster ponds and the recreation area. The Site is serviced by major bus routes along Southdale Road East and Bradly Avenue, connecting the Site to the Major Transit Stations corridor and service commercial in the west, along Wellington Road. The Site is also located within Active Mobility Network and along cycling and walking routes which link the Site to the surrounding trails and Thames Valley Parkway along Thames River in the north.





Data Source: First Base Solutions

**Figure #1**  
**General**  
**Location**  
**Map**

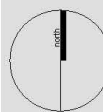
**931 Southdale Road,**  
**London, Ontario**

**LEGEND**

 Subject Lands

**DATE:** 21-06-22

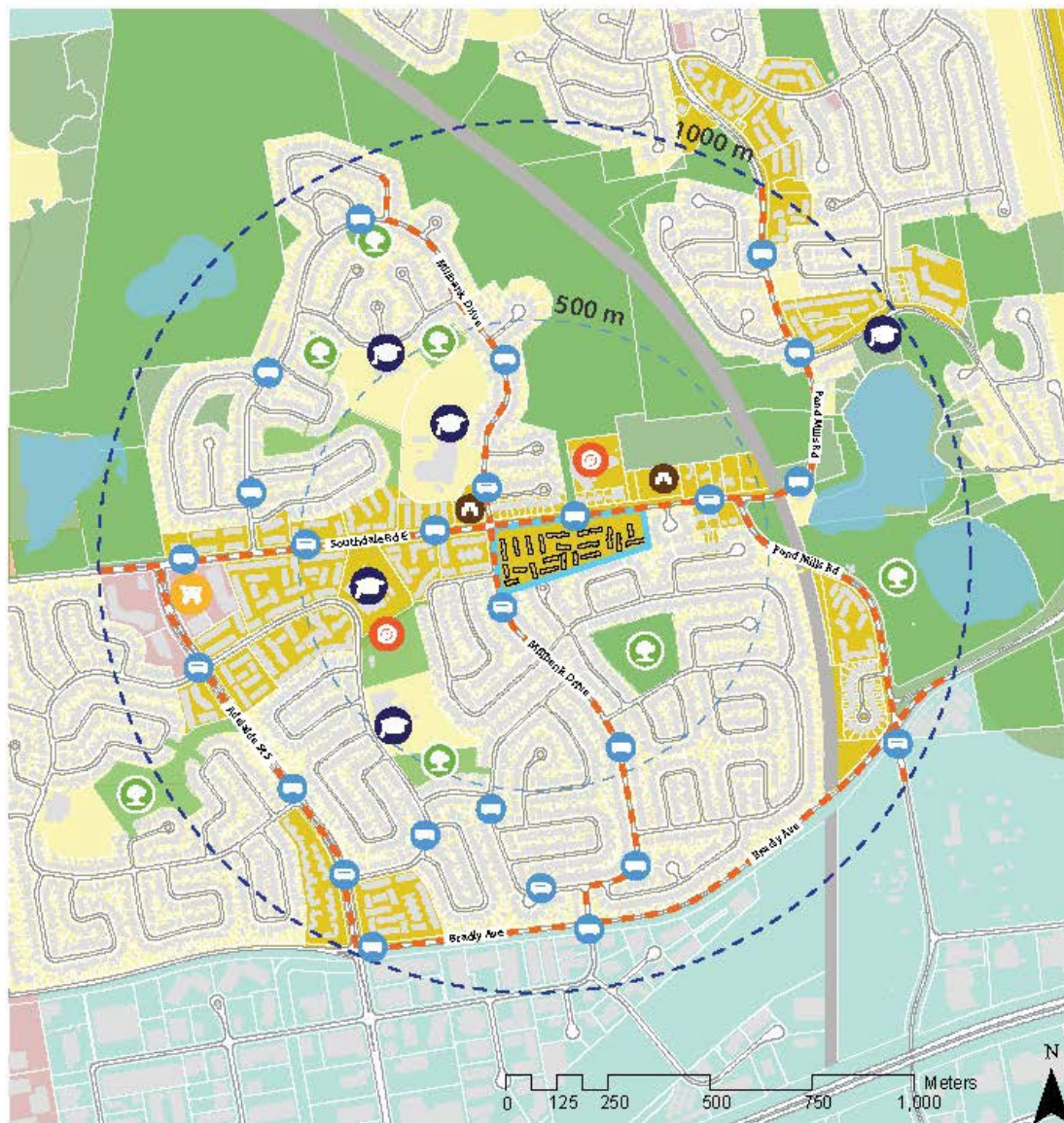
SCALE  
0 75 150 m



**MHBC** PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE  
230-7050 WESTON ROAD WOODBRIDGE, ON, L4L 8G7  
P: 905 761 5588 F: 905 761 5589 | WWW.MHBCPLAN.COM

**Figure 1 General Location Map**





Data Source: <https://data.mcgill.ca/maps/angle.com/>

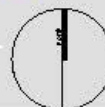
**Figure #2**  
**Context Map**

**931 Southdale Road,  
London, Ontario**

**LEGEND**

- Subject Lands
- Active Mobility Network
- Low Density Residential
- Multi-Family, medium Density Residential
- Light Industrial
- Parks
- Open Space

- Neighborhood Commercial Node
- Bus Stop
- Parks
- Grocery
- School
- Place of Worship
- Community Service



DATE: 21-06-22



Figure 2 Context Map

# 3.0

## Description of Proposal

### 3.1 Concept Plan

The proposal involves the replacement of 68 existing townhouse units on the Site with three 6-storey, 18 metre apartment buildings. The proposed redevelopment contains a total Gross Floor Area (GFA) of 24,280 sq. m, including 4,648 sq. m of existing townhouses. The proposal provides a total of 265 units, including 98 existing townhouses and 167 apartment units ranging in type from 1 to 4-bedroom. The proposed redevelopment is distributed across three phases of demolition/construction. Phase 1 involves demolishing 18 existing units and constructing "Building A" with 6,544 m<sup>2</sup> of GFA representing 53 apartment units. Phase 2 involves demolishing 30 existing townhouse units and constructing "Building B" with 6,544 m<sup>2</sup> of GFA offering 57 apartment units.

Similarly, Phase 3 includes demolishing 20 townhouse units to construct "Building C" with 6,544 m<sup>2</sup> of GFA, culminating in 57 apartment units. The proposal will have a total Building Floor Area of approximately 7,986.9 m<sup>2</sup> (as opposed to the existing 7,810 m<sup>2</sup>) and, in combination with the existing townhouses, will have a proposed density of 64.7 units per hectare (in contrast to the current 38.4 units/hectares). The ground floor of the development features proposed non-residential uses, including LMHC office and community partner space. The ground floor also contains indoor amenity areas, residential lobbies, garbage and moving rooms, maintenance workspace, mechanical and electrical rooms, storage, and mailrooms.

In terms of unit type breakdown, the proposed redevelopment will provide a total of 167 new affordable units inclusive of 3 one-bedroom units (2%), 47 two-bedroom units (28%), 100 three-bedroom units (60%), and 17 four-bedroom units (10%). This unit breakdown represents a very healthy proportion of family-friendly units. A total of 229 parking stalls, including 157 new and 72 existing parking spaces, are proposed to support the redevelopment parking needs and existing residents. Of these, 7 spaces are in the form of barrier-free parking spaces. The development proposal provides 0.75 long-term bike spaces per apartment unit in the form of indoor bike parking rooms on the ground floor of each building and 0.06/apartment unit short-term bike parking at the exterior of the main entrances.

Overall the proposed redevelopment is intended to be compatible with the local development context and complementary to the existing mix of residential dwellings surrounding the Site. Further, implementing this proposal would help broaden housing choices within the Westminster community.

CGS | Curran Gacesa Slote Architects Inc. prepared a preliminary site and building design in support of the aforementioned design goals and objectives. A conceptual site plan (concept

plan) and conceptual architectural renderings have been developed to illustrate the proposed redevelopment's layout, scale and character (refer to **Figure 3** of this Report).

In summary, the proposed redevelopment has been designed to support compact urban form and provide residential buildings compatible with the local development context (existing and planned). The proposed redevelopment also incorporates sufficient setbacks for appropriate landscaping and buffering from the existing developments and adjacent transportation routes. In light of these considerations and commentary provided in this Report, in our opinion, this development should not generate any land use issues with adjacent properties.

The following is an overview of site design and urban design considerations incorporated into the proposed redevelopment concept.

## **3.2 Urban Design Considerations**

### **3.2.1 Site Design**

The proposal includes adding multiple publicly accessible landscape amenity spaces across the Site to serve the existing and new residents and visitors. At the prominent locations along the Site's active frontages, the proposal provides landscape enhancement areas and amenity areas in the form of quality public spaces such as parkettes and amenity gardens to identify and enhance the Site's primary gateways. For instance, the parkette space proposed between Buildings A and B forms the primary pedestrian gateway to the Site, while the pedestrian amenity area at the northwest corner of the Site promotes the Site as a focal point with a high level of legibility. Gateway features identify primary pedestrian entry points to the Site, providing legible connections to the surrounding neighbourhood and community. A multi-use basketball/hockey/pickle ball court is proposed at the rear side of Buildings A and B with direct access through the parkette.

The proposal comprises a network of landscaped pedestrian walkways that connect to the surrounding public realm and creates greatly improved landscape and gateway elements along much of the Site's front yard to improve the Site's appearance, enriching the pedestrian experience. Furthermore, the development's primary residential entrances and lobbies will front the Southdale Road East and have direct pedestrian access from the public sidewalk.

The Site has an existing primary vehicular circulation through a network of private laneways and two access points, one off of Southdale Road East to the north, and one off of Millbank Drive to the west. The proposal connects these two access points to provide better site navigation. The proposal also includes a multi-modal connecting network of laneways and sidewalks to and across the Site to promote pedestrian-friendly circulation with minimum vehicular and pedestrian conflict. The laneways act as the primary vehicular routes that provide direct access to the side and rear of buildings and vehicular entry to parking lots, service, waste, and loading areas.

### 3.2.2 Building Design

The preliminary conceptual renderings illustrate the overall built form for the proposed apartment dwellings. The building forms have been designed with high-quality facades featuring a mix of materials, large windows and varied architectural details to create high-quality, dynamic facades. Additionally, parking and service areas are located on the rear side of the buildings, screened from public view. The massing of the apartments is broken up using a number of design techniques, including:

- Vertical and horizontal articulation;
- Recessions;
- Projections, especially at corners;
- Assemblage of windows;
- Changes in building materials and colours;
- Variety in façade treatments; and
- A variety of window sizes.

Large, low wood and steel canopies mark the main building entrances on Southdale. Benches and landscaping encourage residents to gather, providing eyes on the street and a sense of community. A multi-colour red brick blend and wood-look siding ties the new apartment buildings in with planned exterior renovations for the existing townhouses on the Site. The exterior renovations to the townhouses will refresh and update these units, further improving the neighbourhood character, sense of place, and identity. Areas of buff and charcoal brick on the apartment buildings provide articulation and help further break down the scale of the apartment buildings.

As illustrated in **Appendix A**, the various articulation and changes in building materials and colours being considered visually break the mass of the overall built form into smaller components and create a dynamic composition to convey civic pride and enhance resident dignity.

# 4.0

## Planning Analysis

The proposed redevelopment plan must be assessed in terms of applicable policies prescribed by the Province of Ontario and the City of London. The following discussion outlines how this proposal addresses relevant policies of the Provincial Policy Statement and the new Official Plan (The London Plan).

### 4.1 Provincial Policy Statement

The Provincial Policy Statement (the "PPS") was issued under Section 3 of the Planning Act and applies to planning decisions made on or after May 1, 2020. The PPS provides overall policy direction on matters of provincial interest related to land use planning and development and sets the policy foundation for regulating the development and use of land. One of the key considerations of the PPS is that planning decisions "shall be consistent with" the Policy Statement. Part IV of the PPS provides a vision for land use planning in Ontario that focuses growth within settlement areas and encourages efficient development patterns to optimize the use of land, resources and public investment in infrastructure and public service facilities.

The proposed redevelopment has been evaluated with regard to the policy direction and provisions of the PPS. Based on this analysis, it is our opinion that specific policies within Section 1.0 (Building Strong Healthy Communities) of this policy statement are particularly relevant to this project. Table 2.0 demonstrates how the proposed redevelopment is consistent with the identified policies.

**Policy 1.1.1** Healthy, livable and safe communities are sustained by:

- a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;
- b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;
- c) avoiding development and land use patterns which may cause environmental or public health and safety concerns;
- e) promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs;



g) ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;

**Evaluation:** The development proposal promotes an increased and efficient land use pattern that would support the long-term financial well-being of the Province of Ontario and the City of London (in the form of increased property tax assessment and the optimization of existing and planned infrastructure). Further, the residential population accommodated by this development would support the vitality of existing service/retail commercial enterprises and transportation infrastructure operating within the Westminster District, and along Wellington corridors. Economic benefits would also be derived from the construction of the project.

The Subject Lands are located within a development area containing a range of residential types (existing and planned). Implementation of this proposal would help further diversify the range and mix of housing (including affordable housing) available in this area and, more broadly, the Westminster community.

The proposed redevelopment would not result in environmental or public health and safety concerns.

The proposal will redevelop underutilized lands for residential development within the neighbourhood place type which is serviced by existing transit and infrastructure; thereby minimizing land consumption and servicing costs.

The proposal increases intensification of existing infrastructure to meet current and future needs, thereby optimizing their use.

**Policy 1.1.2** Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of up to 25 years, informed by provincial guidelines. However, where an alternate time period has been established for specific areas of the Province as a result of a provincial planning exercise or a provincial plan, that time frame may be used for municipalities within the area.

**Evaluation:** This proposal would develop lands located within the City's Urban Growth Boundary (UGB) designated to allow for medium density residential purposes pursuant to The London Plan. As discussed in Sections 4.2 of this Report, respectively, the proposed apartment development is consistent with the permissions of The London Plan (Official Plan).

The residential types associated with this proposal are designed to be: compatible with, and complementary to, the local development context (including the mix of residential uses existing on and around the Site). Implementation of this proposal would also broaden the range and mix of housing available within the Westminster community to help meet market demands. Further, this development would help the City accommodate its forecasted population growth and achieve its projected housing requirements.

**Policy 1.1.3.1** Settlement areas shall be the focus of growth and development.

**Evaluation:** The Site is situated within the City's UGB and is therefore considered part of a settlement area defined by the PPS.

**Policy 1.1.3.2** Land use patterns within settlement areas shall be based on densities and a mix of land uses which:

- a) efficiently use land and resources;
- b) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;
- c) minimize negative impacts to air quality and climate change and promote energy efficiency;
- d) prepare for the impacts of a changing climate;
- e) support active transportation;
- f) are transit-supportive, where transit is planned, exists, or may be developed;

**Evaluation:** The proposal will allow for the development of existing underutilized lands with an increased density (compared to the existing uses) and will connect to existing municipal infrastructure. The proposal efficiently uses land and resources at an appropriate and reasonable density for the designation.

To help promote active transportation, the proposed redevelopment includes walkways that will connect to public sidewalk infrastructure along Southdale Road East and Millbank Drive.

The proposed intensification of the Site will provide opportunities to reduce the negative impacts of climate change by promoting active transportation through proximity to existing public transportation and connections to the existing pedestrian network.

**Policy 1.1.3.3** Planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.

**Evaluation:** The Subject Lands are located within an area designated for intensification and redevelopment. Municipal services exist within the area, making the Subject Lands available to accommodate the medium-density residential development that will seek to assist the City in achieving residential growth targets. The proposed redevelopment will reuse an underutilized site and will increase the utilization of existing infrastructure.

**Policy 1.4.3** Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:

- b) permitting and facilitating:



1. all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities;
- c) directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;
- d) promoting densities for new housing which efficiently use land, resources, infrastructure, and public services facilities, and support the use of active transportation and transit in areas where it exists or is to be developed.

**Evaluation:** The proposal will replace 68 townhouse units with 167 apartment units designed in a compact built form on the Site which will broaden the range and mix of multiple-unit housing available to current and future residents of Westminster District in the City of London. This project would also help the City accommodate its forecasted population growth and achieve its projected housing requirements.

The development will occur in an area with a range of services, facilities and existing infrastructure to support intensification. The proposed overall density of 64.7 units/hectare will support active transportation options, and the overall design is in keeping with the surrounding low-rise built form.

The redevelopment plan would utilize existing land and servicing resources efficiently and would be supported by the road transportation system, the active transportation network and transit services.

The proposal represents a compact development pattern that is compatible with and complementary to the local development context. Additionally, it is our opinion that the project would help to further diversify housing choices within the Westminster community.

1.6.1 Infrastructure and public service facilities shall be provided in an efficient manner that prepares for the impacts of a changing climate while accommodating projected needs.

Preliminary servicing reviews have been carried out by Driven Engineering to confirm that the development can proceed in a cost-effective manner and to ensure that the necessary infrastructure is available to meet projected needs. As discussed, it is also anticipated that the development can be accommodated by existing public service facilities.

**Policy 1.6.7.2** Efficient use shall be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.

**Policy 1.6.7.4** A land use pattern, density and mix of uses should be promoted that minimizes the length and number of vehicle trips and support current and future use of transit and active transportation.

**Evaluation:** The proximity of the Site to established service/retail commercial uses, employment areas and parks and recreational facilities would help future residents minimize the length and frequency of vehicle trips. Further, the site layout would also support alternative

transportation modes including pedestrian movement (walking and cycling), as well as transit service along Southdale Road East.

The 2020 Provincial Policy Statement seeks to achieve healthy, livable and safe communities by promoting efficient development and land use patterns. Given the foregoing assessment, in our opinion, the proposed redevelopment plan is consistent with this broad vision. In this respect, the intended use of the Site:

- Represents an efficient development as it supports a more compact, intensive residential form on lands designated as "Neighborhood" place type and for medium density residential purposes;
- Proposes a site design that has regard for the established neighbourhood character, is compatible with the existing development context and encourages active transportation;
- Introduces a range of housing types to help broaden multiple-unit housing choices, including affordable housing options for current and future residents of Westminster community, and to help the City accommodate its forecasted population growth and to achieve its projected housing requirements; and
- Promotes a scale of residential development that would help to (1) optimize municipal investments in servicing infrastructure and public transit, (2) support the long-term viability of commercial activities proximate to the Site, and (3) generate substantial tax revenues to benefit the financial well-being of the Province and the City.

In light of these considerations and our broader evaluation of this development proposal relative to the policies of the PPS, it is our opinion that the project is consistent with this policy document.

## **4.2 City of London Official Plan (The London Plan)**

### **4.2.1 Status**

The City of London Council adopted a new Official Plan on June 23, 2016 and the Ministry of Municipal Affairs (MMA) issued its approval of The London Plan, with modifications, on December 30, 2016. All of the City's by-laws and public works must conform to the policies of The London Plan. As of May 2022, *The London Plan* is in force as the new official plan for the City of London and the *1989 Official Plan* has been repealed by both the OLT and City Council.

The proposal aligns with the policy direction and development provisions of The London Plan as approved.

### **4.2.2 Place Type and Policy Overview**

The Site is designated Neighbourhoods on the land use schedule Map 1 - Place Types of The London Plan as shown in **Figure 4 & Figure 5**. In light of this designation and the scope of this project, in our opinion, the Our Strategy, Our City, City Building, Place Type Policies of The London Plan contain policies applicable to the proposed redevelopment.

The following discussion (1) summarizes, in our opinion, the core policies of The London Plan relating to this proposal and (2) evaluates the project's merits relative to this policy framework.

#### 4.2.3 **Our Strategy**

The Our Strategy part of The London Plan contains a series of policies that address the core values, vision and key directions of the Plan to help guide planning and city-building activities. The core values of this Official Plan are set out in Policy 52, and include a number of themes relating to development proposals (e.g., be collaborative, be innovative, think sustainable). Further, Policy 53 defines the vision for The London Plan to provide a focus for planning decisions: "London 2035: Exciting, Exceptional, Connected".

Policies 54 to 63 define eight key directions to help achieve this broad vision and guide planning development to the year 2035 (The London Plan's 20-year planning horizon). In our opinion, the following key directions and associated planning strategies have particular relevance to this proposal:

##### **"55\_ Direction #1 Plan strategically for a prosperous city**

1. Plan for and promote strong and consistent growth and a vibrant business environment that offers a wide range of economic opportunities.
4. Revitalize our urban neighbourhoods and business areas.
11. Plan for cost-efficient growth patterns that use our financial resources wisely.

##### **59\_ Direction #5 Build a mixed-use compact city**

1. Implement a city structure plan that focuses high-intensity, mixed-use development to strategic locations - along rapid transit corridors and within the Primary Transit Area.
2. Plan to achieve a compact, contiguous pattern of growth – looking "inward and upward".
3. Sustain, enhance, and revitalize our downtown, main streets, and urban neighbourhoods.
5. Ensure a mix of housing types within our neighbourhoods so that they are complete and support aging in place.

##### **60\_ Direction #6 Place a new emphasis on creating attractive mobility choices**

5. Plan for intense, mixed-use development to centres that will support and be served by rapid transit integrated with walking and cycling
6. Dependent upon context, require, promote, and encourage transit-oriented development forms.

##### **61\_ Direction #7 Build strong, healthy and attractive neighbourhoods for everyone**

1. Plan for healthy neighbourhoods that promote active living, provide healthy housing options, offer social connectedness, afford safe environments, and supply well distributed health services.
2. Design complete neighbourhoods by meeting the needs of people of all ages, incomes and abilities, allowing for aging in place and accessibility to amenities, facilities and services.
3. Implement "placemaking" by promoting neighbourhood design that creates safe, diverse, walkable, healthy, and connected communities, creating a sense of place and character.

## **62\_ Direction #8** Make wise planning decisions

1. Ensure that all planning decisions and municipal projects conform with The London Plan and are consistent with the Provincial Policy Statement.
2. Plan for sustainability – balance economic, environmental, and social considerations in all planning decisions.
4. Plan so that London is resilient and adaptable to change over time.
8. Avoid current and future land use conflicts – mitigate conflicts where they cannot be avoided.
9. Ensure new development is a good fit within the context of an existing neighbourhood."

**It is our opinion** that the proposal supports the key directions set out in the referenced policies, as the development would:

- Promote cost-effective development that efficiently utilizes existing and new servicing infrastructure to accommodate project needs;
- Integrate a compact and contiguous growth pattern;
- Broaden housing choice in the Westminster community to accommodate a range of household (by providing a mix of affordable apartment units);
- Incorporate a land use pattern that is in keeping with Provincial and City planning policies, is compatible with the existing development context and should not generate adverse land use impacts; and
- Evaluate sustainable development features during the detailed design phase of the development approval process.

### **4.2.3.1 Overview**

The Our City part of The London Plan contains policies and schedules relating to the City Structure Plan that have particular relevance to this development proposal.

Policy 69 of the Official Plan states that the City Structure Plan establishes a framework for London's growth for the 20-year planning horizon and informs other policies of the Plan. Policy 70 of this Official Plan further prescribes that, "All of the planning we do will be in conformity with the City Structure Plan ... Planning and development applications will only be approved if they conform with the City Structure Plan."

Policy 69 also identifies that the City Structure Plan is set out in five associated frameworks: growth, green, mobility, economic, and community. Policies 71 to 146 provide policy direction relating to each of these frameworks.

In our opinion, the development context associated with this proposal is in keeping with the City Structure Plan. It is also our opinion that the project has regard for the policies and/or schedules relating to the five frameworks.

#### **4.2.4 City Building**

##### **4.2.4.1 City Design Policies**

Within the City Building part of this Official Plan, the City Design chapter provides a series of guidelines with respect to urban design. Policies 189 to 306 of this Official Plan define the City Design policies that are intended to guide the character and form of development.

The overarching objectives of these policies are outlined in Policy 193:

"In all of the planning and development we do and the initiatives we take as a municipality, we will design for and foster:

1. A well-designed built form throughout the city.
2. Development that is designed to be a good fit and compatible within its context.
3. A high-quality, distinctive and memorable city image.
4. Development that supports a positive pedestrian environment.
5. A built form that is supportive of all types of active mobility and universal accessibility.
6. High-quality public spaces that are safe, accessible, attractive and vibrant.
7. A mix of housing types to support ageing in place and affordability.
8. Sustainably designed development that is resilient to long-term change.
9. Healthy, diverse and vibrant neighbourhoods that promote a sense of place and character."

In our opinion, the project description and concept provided in this Report demonstrate that the proposed redevelopment has been designed to achieve these broad objectives. Further, it is our opinion that the project design aligns with the intent of the character, street network, streetscape, public space, site layout and building form policies set out in the City Design section of the new Official Plan. Of particular relevance to this proposal are those policies related to the neighbourhood Character and Placemaking, Site Layout, and Building Design, including the following:

**"197\_** The built form will be designed to have a sense of place and character consistent with the planned vision of the place type by using such things as topography, street patterns, lotting patterns, streetscapes, public spaces, landscapes, site layout, buildings, materials and cultural heritage.

**199\_** All planning and development proposals within existing and new neighbourhoods will be required to articulate the neighbourhood's character and demonstrate how the proposal has been designed to fit within that context. ...

**252\_** The site layout of new development should be designed to respond to its context and the existing and planned character of the surrounding area.

**253\_** Site layout should be designed to minimize and mitigate impacts on adjacent properties.

**256\_** Buildings should be sited so that they maintain and reinforce the prevailing street wall or street line of existing buildings.

**261\_** Buildings at corner sites should be oriented towards the higher-order street classification.

**269\_** Buildings should be sited to minimize the visual exposure of parking areas to the street.

**286\_** Buildings should be designed to achieve human-scale relationships that are comfortable for pedestrians.

**287\_** Within the context of the relevant place type policies, the height of buildings should have a proportional relationship to the width of the abutting public right-of-way to achieve a sense of enclosure.

**288\_** Buildings fronting onto public spaces should establish an edge to provide definition, and a sense of enclosure around the public space.

**290\_** Buildings located on corner sites should address the corner through building massing, location of entrances and architectural elements.

**291\_** Principal building entrances and transparent windows should be located to face the public right-of-way and public spaces, to reinforce the public realm, establish an active frontage and provide for convenient pedestrian access.

**295\_** Residential and mixed-use buildings should include outdoor amenity spaces.

**298\_** Design measures relating to building height, scale and massing should be used to provide a transition between development of significantly different intensities, considering the existing and planned context."

Given the commentary provided in this Report, **it is our opinion** that the design elements of the proposed redevelopment are in keeping with the aforementioned design direction. Most notably, the site design and orientation, streetscape design, the planned housing types and building architecture are intended to support a complementary and context-sensitive development with a definable sense of place. It is anticipated that certain design elements (e.g., contemporary building façade materials and vernacular, universally accessible amenity areas, and enhanced landscaping) would also be utilized to enhance the surrounding streetscape and

public realm while promoting the development's character and functionality and complementing the identity of the neighbourhood. The proposed height and density provide for a scaled transition to the existing context and are compatible with and complementary to the planned residential setting.

#### 4.2.5 Neighbourhoods Place Type Policies

The London Plan shows the Subject Lands within the "Neighbourhoods" place type (**Figure 4** – Map 1 – Place Types) along a "Civic Boulevard" road type (**Figure 5** - Map 3 – Street Classifications). As per Tables 10-12 of The London Plan, this combination of place type and road type classification permits a variety of residential uses including townhouses and low-rise apartments. The maximum height for these permitted uses along a "Civic Boulevard" is four (4) storeys, or six (6) storeys with bonusing (discussed later in this Report).

Policy 921 of The London Plan characterizes Neighborhood Place Type designation as vibrant areas with a strong "sense of Place", a diversity of housing, and easy access to (within walking distance of) daily goods and services.

With respect to the abovementioned designation and policies, a residential redevelopment (intensification) consisting of three apartment buildings offering 167 residential units is being proposed on the Subject Lands. This is permitted within the Neighborhood Place Type and is proposed at the appropriate scale and intensity. The Zoning By-law ultimately regulates the scale and intensity of uses.

The Zoning By-law Amendment requested for the proposed redevelopment will facilitate development that is context-sensitive and at an intensity that is compatible with the surrounding neighborhood.

##### 4.2.5.1 Vision

Policy 916 sets out an overall vision for development in the Neighbourhoods place type, "...will be vibrant, exciting places to live that help us to connect with one another and give us a sense of community well-being and quality of life."

Eight principal elements are also defined in this Policy to help achieve the vision statement:

1. A strong neighbourhood character, sense of place and identity.
2. Attractive streetscapes, buildings, and public spaces.
3. A diversity of housing choices allows for affordability and gives people the opportunity to remain in their neighbourhoods as they age if they choose to do so.
4. Well-connected neighbourhoods, from place to place within the neighbourhood and to other locations in the city such as the downtown.
5. Lots of safe, comfortable, convenient, and attractive alternatives for mobility.
6. Easy access to daily goods and services within walking distance.

7. Employment opportunities close to where we live.
8. Parks, pathways, and recreational opportunities that strengthen community identity and serve as connectors and gathering places."

Further, Policy 918 provides additional direction regarding how this broad vision will be achieved, including these policies which, in our opinion, are relevant to this proposal:

1. "Through the review of all planning and development applications, neighbourhoods will be designed to create and enhance a strong neighbourhood character, sense of place and identity.
2. Neighbourhoods will be planned for diversity and mix and should avoid the broad segregation of different housing types, intensities, and forms.
13. Intensification will respect existing neighbourhood character and offer a level of certainty, while providing for strategic ways to accommodate development to improve our environment, support local businesses, enhance our physical and social health, and create dynamic, lively, and engaging places to live."

In our opinion, the site layout integrates several components to support the broad vision of the Neighbourhoods place type and the related objectives of Policy 918. Most notably:

- The land use pattern is intended to: promote a distinctive character and respond to the local development context;
- The apartment forms integrated into the development plan are intended to help meet market demands in the Westminster community through much needed affordable housing; and
- The internal road system is designed to encourage neighbourhood connectivity and offer mobility options by way of linkages to the neighborhood connectors and local street networks.

#### **4.2.5.2 Permitted Uses and Building Scale**

Several residential forms and secondary uses (e.g., retail/service commercial activities, community facilities, small-scale offices) are permitted in the Neighbourhoods place type contingent, in part, on the adjacent road network. With respect to this Site, Map 3 (Street Classifications) of The London Plan categorizes Southdale Road as a Civic Boulevard which permits stacked townhouses, four plexes, low-rise apartments, emergency care establishments, rooming houses, supervised correctional residences, and mixed-use buildings.

#### **4.2.5.3 Forms of Residential Intensification**

Section 937 of *The London Plan* states that residential intensification, in the form of redevelopment, and the removal of existing buildings in favour of one or more new buildings, is encouraged. The proposed redevelopment is considered residential intensification as it offers more dwelling units than the existing townhouse dwellings.

#### **4.2.5.4 Urban Design Consideration for Residential Intensification**



Sections 940 and 953 of *The London Plan* provide that intensification projects should be appropriately located to fit well within the surrounding context. The Subject Lands are unique in their context, being situated on the corner abutting a civic boulevard to the north and a neighborhood connector to the west. The proposal is compatible with and appropriately transitions to existing low-density residential uses on the Site, and the surrounding lands that have the same designation. The proposed redevelopment will also be compatible with potential future development in the surrounding area that takes advantage of the similar policy objectives of the Plan.

#### **4.2.6 Bonus Zoning**

The London Plan policies for the Site are those of a Neighbourhoods Place Type at the intersection of a civic boulevard and neighbourhood connector. These policies permit low-rise apartment buildings up to 4-storeys with bonusing up to 6 storeys in favour of facilities, services, or matters that provide substantive public benefits. As demonstrated in this Report, the proposed redevelopment meets the objectives of Type 2 bonusing by way of the Zoning By-law Amendment and through 1) Provision of affordable housing, 2) Provision of community facilities and amenities, 3) Contribution to the development of transit amenities, features, and facilities, and 4) Supporting sustainable forms of development and active transportation. The following policies of The London Plan, described as Bonus Zoning, are relevant to this development proposal and Zoning By-law Amendment as the proposed development exceeds the height permitted by the Neighborhood place type and the Zoning By-law. The proposed development falls under Type 2 Bonusing as outlined through policies 1649 to 1655 of the Plan.

**1638\_** City Council may pass a by-law, known as a bonus zone, to authorize increases in the height and density of development beyond what is otherwise permitted by the Zoning By-Law, in return for the provision of such facilities, services, or matters as are set out in the bonus zone.

**1639\_** Where an owner of land elects to provide facilities, services, or matters in return for an increase in the height or density of development, the municipality will require the owner to enter into one or more agreements with the City dealing with the facilities, services, or matters. This agreement may include such things as drawings, elevations and site plans. The agreement may be registered against the land to which it applies and the City will be entitled to enforce the agreement against the owner and, subject to the provisions of the Registry Act and the Land Titles Act, against any and all subsequent owners of the land.

**1640\_** Each proposal for Bonus Zoning will be considered on its own merits. The allowance for greater height and density on one Site in return for certain facilities, services and matters will not be considered to establish a precedent for similar height and density on any other site.

**1641\_** The facilities, services and matters to be provided in return for greater height or density do not necessarily have to be provided on the same Site as the proposed development. City Council may want to have such benefits directed to a property in the applicable neighbourhood or to lands within the wider city.

**1642\_** Where an application has been made for a Type 1 or Type 2 Bonus Zone, the applicant shall submit a Justification Report that identifies the facilities, services or matters that are to be provided and how their public benefit is commensurate with the extent of the greater height and density that is being requested.

**1643\_** Bonus Zoning may be utilized to achieve any of the policy objectives of The London Plan. Consistent with the Planning Act, The London Plan establishes the following two separate classifications of Bonus Zoning:

1.Type 1 Bonus Zoning – where the proposed bonus zone allows for a height or density that is within the standard maximum height or density limit allowed in the applicable place type.

2.Type 2 Bonus Zoning – where the proposed bonus zone allows for a height or density that exceeds the standard maximum height or density limit allowed in the applicable place type.

**1644\_** A framework of heights, permitted under Type 1 and Type 2 Bonus Zoning, is shown on Table 8 at the beginning of the Urban Place Type policies.

#### **4.2.6.1 Type 2 Bonus Zoning**

Policy 1649 states that Type 2 Bonus Zoning may allow for a height or density that exceeds the standard height or density limit otherwise permitted by the applicable place type. The redevelopment proposal proposes height within the height limits under Type 2 Bonus Zoning and the following policies are relevant to the requested bonusing.

**1650\_** Type 2 Bonus Zoning may permit greater height or density in favour of a range of facilities, services, or matters that provide significant public benefit in pursuit of the City Building goals of this Plan. However, an applicant must demonstrate that this greater height or density represents good planning.

**1651\_** In all cases, proposals for Type 2 Bonus Zoning shall meet the requirements of Type 1 Bonus Zoning.

**1652\_** Under Type 2 Bonus Zoning, additional height or density may be permitted in favour of facilities, services, or matters such as:

1. Exceptional Site and building design.
2. Cultural heritage resources designation and conservation.
3. Dedication of public open space.
4. Provision of off-site community amenities, such as parks, plazas, civic spaces, or community facilities.
5. Community garden facilities that are available to the broader neighbourhood.
6. Public art.
7. Cultural facilities accessible to the public.
8. Sustainable forms of development in pursuit of the Green and Healthy City policies of this Plan.

9. Contribution to the development of transit amenities, features and facilities.
10. Large quantities of secure bicycle parking, and cycling infrastructure such as lockers and change rooms accessible to the general public.
11. The provision of commuter parking facilities on Site, available to the general public. Affordable housing.
12. Day care facilities, including child care facilities and family centres within nearby schools.
13. Car parking, car sharing and bicycle sharing facilities all accessible to the general public. Extraordinary tree planting, which may include large caliper tree stock, a greater number of trees planted than required, or the planting of rare tree species as appropriate. Measures that enhance the Natural Heritage System, such as renaturalization, buffers from natural heritage features that are substantively greater than required, or restoration of natural heritage features and functions.
14. Other facilities, services, or matters that provide substantive public benefit.

**1653\_** Type 2 Bonus Zoning will only be permitted where it is demonstrated that the resulting intensity and form of the proposed development represents good planning within its context.

**1654\_** Greater height or density offered through Type 2 Bonus Zoning will be commensurate with the public value of the facility, service or matter that is provided.

**1655\_** Where cash is received by the municipality in favour of greater height or density through bonus zoning, all money received shall be paid into a special account and spent only for the facilities, services or matters specified in the implementing by-law.

The development proposal introduces a range of housing types to help broaden multiple-unit housing choices including affordable housing options for current and future residents of the Westminster community and to help the City accommodate its forecasted population growth and achieve its projected housing requirements. These additional units would also help to promote neighbourhood stability by diversifying the mix of housing available in the community (to better meet the changing needs of local residents over the long-term while responding to the much-needed affordable housing). In addition, the proposed redevelopment promotes a scale of residential development that would help to (1) optimize municipal investments in servicing infrastructure and public transit, (2) support the long-term viability of commercial activities proximate to the Site, and (3) generate substantial tax revenues to benefit the financial well-being of the Province and the City, 4) promote a sustainable form of development through efficient use of land in the form of infill development and supporting active transportation initiatives, 4) contribute positively to the expansion of community amenities and facilities, and 5) respond to the local development context through proposing a compact and transit-oriented development. In our opinion, the residential uses integrated into this proposal conform to the land use, intensity, and form permissions of The London Plan, including City Design policies as outlined in section 4.2.4 City Building of this Report.

In light of these considerations and our broader evaluation of this development proposal relative to the policies of The London Plan, **it is our opinion** that the proposal meets the objective of Type 2 Bonus Zoning by way of the proposed Zoning By-law Amendment.

#### 4.2.7 **Summary**

In our opinion, the proposed redevelopment plan supports the vision, guiding elements and permissions of Neighbourhoods Place Type. In light of the foregoing considerations and our broader review of The London Plan, it is also our opinion the proposal conforms to the policy direction and provisions of this Official Plan.

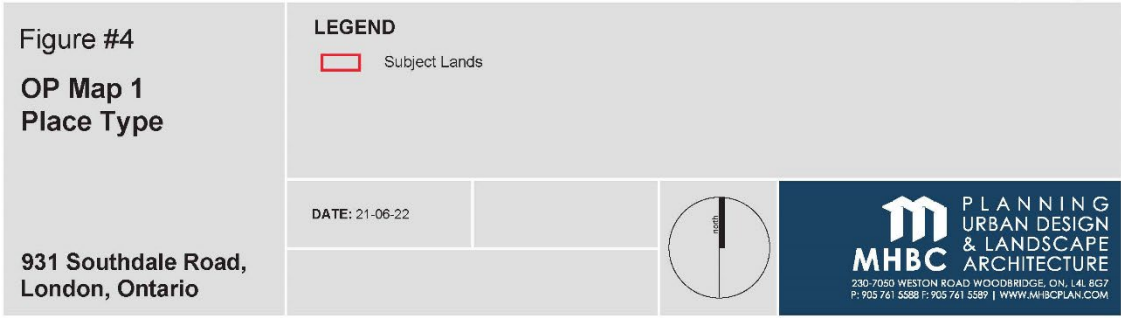
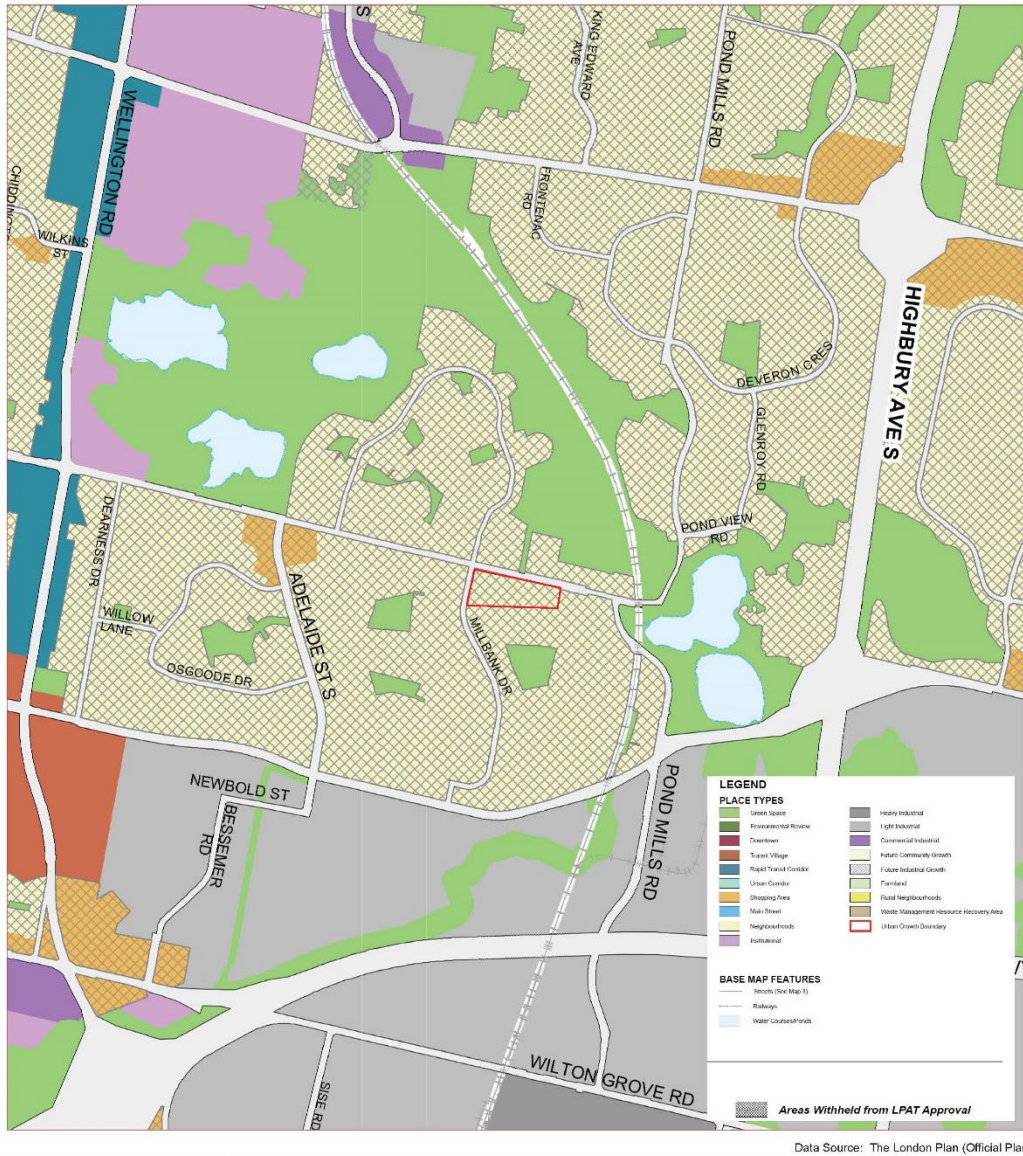


Figure 3 Official Plan Map 1- Place Type



Data Source: The London Plan (Official Plan)



Figure 4 Official Plan Map 3- Street Classification

# 5.0 City of London Zoning By-law Z.-1

## 5.1 Existing Zoning

**Figure 6** of this Report illustrates that R5-5 zone is applied across the Site pursuant to Schedule A of the City of London Zoning By-law Z.-1 (Zoning By-law). The east portion of the Subject Lands is zoned Residential R5 with a temporary T-65 zone that permits a Family Health Nurse Practitioner-Led clinic for a specific time, started June 20, 2011 and ended June 20, 2014 (3 years after the initial date). There is a Special Provision (R5-5(DC)) on a portion of the lands that permits Day Care use with special provision.

Section 9 of the Zoning By-law Z.-1 prescribe that the R5-5 Zone permits cluster townhouses with a maximum building height of 12.0 m, and a maximum density of 45 units/ha.

The following is a summary of the zoning provisions applicable to the proposal:

**Table 2 – Zoning Regulation for R5-5 Zone Variation**

Residential R5 Zone	(Zoning By-law Section 9) Regulation for R5-5 Zone Variation
ZONING PROVISIONS	REQUIREMENTS
Residential Type	This R5 Zone provides for and regulates medium density residential development in the form of cluster townhouses.
Permitted Uses *	a) Cluster townhouse dwellings; b) Cluster stacked townhouse dwellings
Lot Area (M2) Minimum	1500 m2
Lot Coverage (%) (Maximum)	40%
Lot Frontage (M)	30.0 m Subsection 9.3(1): In infilling situations, the frontage requirement may be reduced to 10.0 metres (32.8 feet) provided that no buildings are located in any part of the lot less than 30.0 metres (98.4 feet) in width.
Density – Units Per Hectare Maximum	45
Front Yard Setback (M) (Maximum)	Subsection 9.4 (1)(i): 6.0 m
Front and Exterior Side Yard Depth (M) Minimum	Arterial; Southdale Rd E 8.0 m
	Secondary: Millbank Drive 6.0 m



Residential R5 Zone	(Zoning By-law Section 9) Regulation for R5-5 Zone Variation
ZONING PROVISIONS	REQUIREMENTS
Interior Side & Rear Yard Depth (M) Minimum	Subsection 9.3): A) 0.5 metres (1.6 feet) per 1.0 metres (3.28 feet) of main building height or fraction thereof, but in no case less than 3.0 metres (9.8 feet) when the end wall of a unit contains no windows to habitable rooms, or 6.0 metres (19.7 feet) when the wall of a unit contains windows to habitable rooms; B) 3.0 metres (9.8 feet) where the end wall of an end unit facing the rear yard and/or interior side yard may contain a window(s) to habitable rooms on the group floor only and no access points to the dwelling unit along the end wall facing the rear yard and/or the interior sideyard.(Z.-1-00761) (Z.-1-021025)
Landscaped Open Space (%) Minimum	35%
Height (M) Maximum	12.0 m

## 5.2 Proposed Zoning

Following an analysis of the Zoning By-law, it was concluded that the existing zoning structure does not permit the intended apartment buildings on the Site. It was also concluded through this review that the proposal closely aligns with the permissions of the Residential R8 Zone as outlined in section 12 of the Zoning By-law and can be accommodated under that zone structure with special provisions that permit the increased height, reduced parking rate, and reduced front yard depth as indicated in **Appendix C** of this Report.

The following is a summary of the R8 Zone requirements and the proposal provisions. Fields shown in bold indicate proposed site-specific provisions.

**Table 3 – Comparison of the proposal with Selected Zoning Regulation (R8 Zone)**

Residential R8 Zone	(Z.-1-Sec 12) Regulation for R8 Zone Variations	PROPOSAL
ZONING PROVISIONS	REQUIREMENTS	PROVISION
Residential Type	Apartment Buildings, Stacked Townhouses, Lodging Houses, & Special Population's Accommodations	Apartment Buildings
Lot Area (M) Minimum	1000	43,200
Lot Frontage	30	365.50
Density – Units Per Hectare Maximum	75	64.7
Maximum Lot Coverage (%)	40	19.5



Residential R8 Zone	(Z.-1-Sec 12) Regulation for R8 Zone Variations	PROPOSAL
ZONING PROVISIONS	REQUIREMENTS	PROVISION
Front and Exterior Side Yard Depth (M) Minimum (Arterial; Southdale Rd E Secondary: Millbank Drive)	6 metres (19.7 feet) plus 1 metre (3.3 feet) per 10 metres (32.8 feet) of main building height or fraction thereof above the first 3.0 metres (9.8 feet)	<b>Front Yard Depth: 1.0 m to building, 0 m to canopy</b>  Exterior Yard Depth: 31.97m
Interior Side & Rear Yard Depth (M) Minimum	1.2 metres (3.9 feet) per 3 metres (9.8 feet) of main building height or fraction thereof above 3 metres (9.8 feet), but in no case less than 4.5 metres (14.8 feet)	Interior Yard Depth: 104.11 m  Rear Yard Depth: 66.5 m
Landscaped Open Space (%) Minimum	30	58.6
Height (M) Maximum	The Zone provides for and regulates medium density development in the form of low rise apartment buildings which will vary in form depending on adjacent land uses, but in no case shall exceed 16 metres (52.5 feet) in height.	<b>18 m</b>
	(Z.-1-Sec 4) General provision	
Parking for Apartment Building (Recommended Minimum Parking Requirements)	Sec 4) 10b ; 1.25 per unit	<b>0.75 space/apt unit and 1.0 space/townhouse unit</b>
Parking for Townhouse Cluster (Area 3)	Sec 4) 10b ; 1.5 per unit	<b>Total: 229 spaces</b>
Number of Bicycle Parking Spaces	Sec 4) 16); Apartment buildings and lodging houses (with five or more residential units) shall be required to provide 0.75 long-term bicycle parking space per residential unit.	0.75/ apt. unit long-term; 0.06/ apt. unit short-term
Accessible Parking Space (where there are between 201 and 1,000 parking)	Sec 4) 10C(V); Two parking spaces for the use of persons with disabilities and an additional two percent of parking spaces for the use of persons with disabilities	229 x 2% = 5, plus 2 = 7
Yard Encroachment Permitted (Balconies)	Sec 4) 4.27); 1.5 metres (4.9 feet) provided the projection is no closer than 3.0 metres (9.8 feet) to the lot line	NA

**Appendix C** to this Report contains a Zoning Data Sheet prepared by MHBC for this project. This zoning review illustrates that the proposed building scale and site layout meet R8 Zone regulations, save and except for the front yard depth, height, and parking provisions. The site-specific permissions are required to address the following matters, and to provide flexibility to accommodate minor design modifications that may arise during project planning:

- Permit the minimum front yard depth of 1.0 m, whereas the Zoning By-law requires 7.5 m;
- Permit the minimum off-street parking rate of 0.75 space per apartment unit and 1.0 space per townhouse unit, whereas the Zoning By-law requires 1.25/apt unit and 1.5/ townhouse unit.
- Permit a maximum building height of 18 m to accommodate the 6-storey building height of the proposed apartment;

### 5.3 Rationale for the Amendment

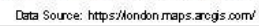
The proposal seeks an increase in height from 16 to 18 m, reduced parking rate from 1.25 spaces per unit to 0.83 spaces per unit, and reduced front yard depth from 8.0 m to 1.0 m to building and 0 m to ground floor canopies. The following outlines the rationale for the amendment. The building height is being minimized as an affordable housing project.

The increase in height is in line with the bonusing provisions of the London Plan, accommodating 6 storeys in exchange for affordable housing. Furthermore, the additional height required is only two additional metres.

The reduced parking rate is in line with more current practices, particularly for rental housing, where there is an anticipated lesser demand on car ownership. In addition, the proposed parking rate is consistent with the City of London's hybrid approach toward parking regulation and recommendations as outlined in the staff report dated July 25th, 2022. This report suggested a reduced minimum parking rate of 1 per townhouse unit and 0.5 per apartment unit for Neighborhoods place type. Lastly, the proposal is well served by area transit and meets the required bicycle parking on Site.

The proposed reduction in front yard setback is appropriate as they bring the built form closer to the street, promoting the objectives of the Civic Boulevard in the London Plan. This will promote eyes on the street and informal surveillance that encourages activity and safety along the streetscape. Finally, the uses on the ground floor, including indoor amenities and community partner spaces, further encourage activity and animation on the streetscape that supports a reduced front yard setback.

Given the above rationale, the proposed amendments are in the public interest and represent good planning.



### Figure 5 Existing and Proposed Zone

# 6.0

## Conclusions

In conclusion, it is our opinion that the proposed Zoning By-law Amendment is appropriate for the Site, compatible with the existing development context and in keeping with the framework of applicable planning policy. This assessment is based, in part, on consideration of the following project merits:

1. The Subject Lands are situated within the Westminster Planning Area and are currently designated for medium-density residential purposes pursuant to the City of London's new Official Plan (The London Plan);
2. The property is well-suited for the intended Apartment use considering its physical dimensions, its location within an established residential community and its proximity to the established retail/commercial uses, employment areas, recreational facilities, parks and public transit routes;
3. The apartment development would help promote housing choice within the Westminster community and, more broadly, the City of London. These additional units would also help encourage neighbourhood stability by diversifying the mix of housing available in the community (to better meet the changing needs of local residents over the long-term);
4. The residential types associated with this proposal are designed to be compatible with the local development context and complementary to the mix of residential uses planned for Westminster Planning District. Accordingly, in our opinion, this development project should not generate a negative land use impact on the adjacent properties;
5. Design elements integrated into the apartment layout would contribute positively to the local streetscape, support active transportation and transit service and provide common outdoor amenity space for residents and visitors;
6. The design elements and landscaping integrated into the site design promote publicly accessible landscape and amenity areas and create a safe, comfortable, and attractive pedestrian realm;
7. Preliminary assessments indicate that adequate servicing infrastructure is available to accommodate the proposed redevelopment;
8. In our opinion, this development proposal is consistent with the Provincial Policy Statement and conforms with the policy direction and permissions of the City's new Official Plan; and
9. The proposed site-specific amendment to the City's Zoning By-law would appropriately implement the intended building design and site layout.

Given the noted considerations and the commentary presented in this Report, it is our opinion that the application is in the public interest and represents good planning. We recommended that the City of London approve the Zoning By-law Amendment application, as proposed.

Respectfully submitted,

**MHBC**

A handwritten signature in black ink, appearing to read 'E. Theodore'.

Eldon C Theodore, BES, MUDS, MCIP, RPP, LEED AP  
Partner

A handwritten signature in black ink, appearing to read 'Mahshid fadaei'.

Mahshid Fadaei, BArch, MArch, MPlan  
Intermediate Planner & Urban Designer