

Final

# Planning Justification Report

## 192-196 Central Avenue, London

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Prepared for Farhi Holdings Corporation  
by Arcadis Professional Services (Canada) Inc.  
August 1, 2023

# Document Control Page

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# 1 Introduction

On behalf of our client, Farhi Holdings Corporation, we are pleased to submit this Planning Justification Report as part of the complete Zoning By-Law Amendment application for the proposed development on the subject lands municipally known as 192-196 Central Avenue in the City of London (“Subject Lands”, “Site” or “Subject Property”).

Our client is proposing to develop the lands with a 13 storey residential development consisting of 126 residential dwellings and two (2) levels of underground parking to provide 68 parking spaces. To advance the proposed development, the applicant is proposing a Zoning By-Law Amendment by way of Site-Specific Relief to the existing R10-4 Zone.

This Report has been prepared as part of the complete Zoning By-Law Amendment Application required prior to the development of the subject property. This Report provides an analysis of the land use planning framework applicable to the subject property, including Provincial legislation, plans and policy, as well as the City of London’s planning framework.

Based on our assessment of this planning framework, it is our opinion that the proposed development has regard for the “Matters of Provincial Interest” set out by the Planning Act and is consistent with the Provincial Policy Statement. It is our opinion that the proposed development represents context-sensitive intensification of an underutilized property, which is supported and encouraged by Provincial policy and plans. For these reasons and other matters discussed in this Report, it is our opinion that the proposed development represents good land use planning.

# 2 Site Location and Context

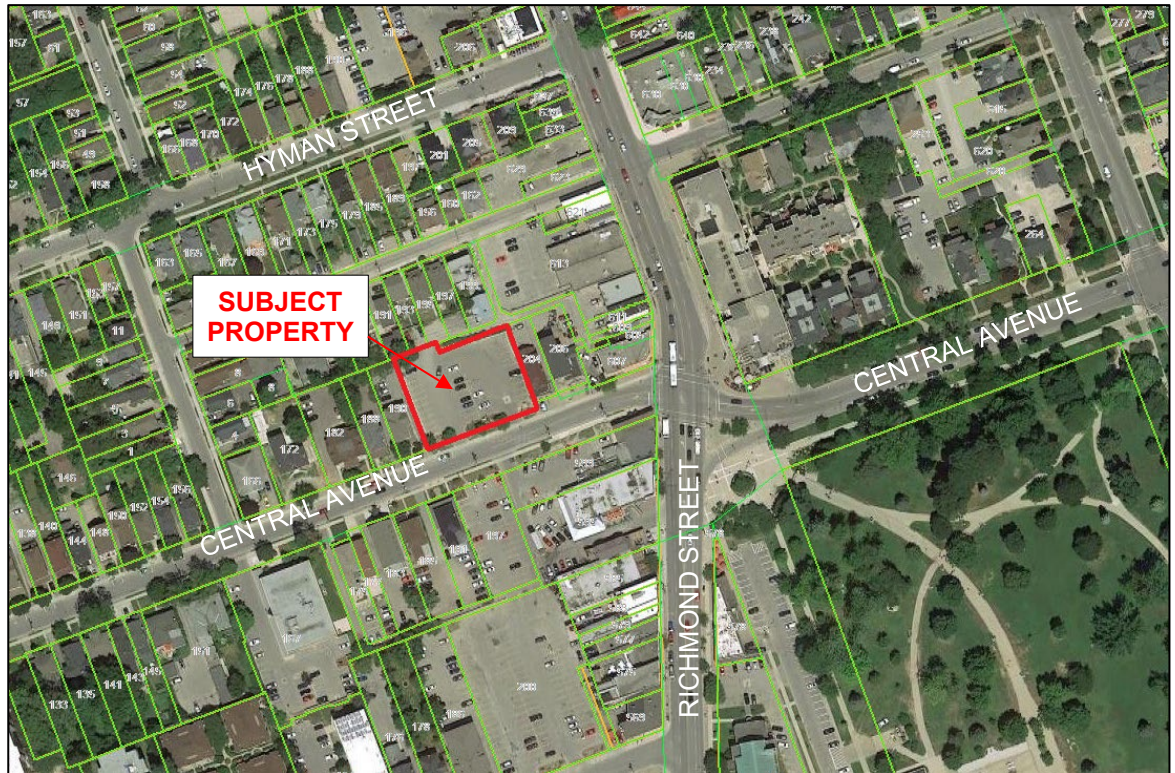
This section of the Report describes the existing conditions of the subject lands and its context within the broader area.

## 2.1 Site Location and Context

The subject lands are municipally known as 192-196 Central Avenue in the City of London and legally identified as follows:

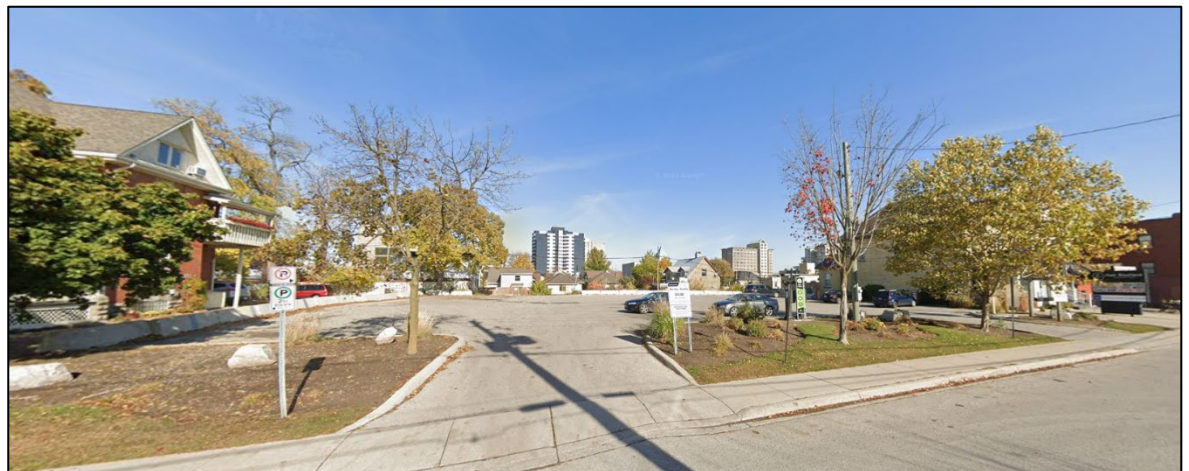
PARCEL 27-1, SECTION 33-L-238(W) PT LT 27 & ALL LOTS 28, 29 & A PLAN 238(W),  
PTS 1 & 5 33R10101; T/W ROW W13470 LONDON

The subject lands are located on the north side of Central Avenue; west of the intersection of Richmond Street and Central Avenue; and north of the Downtown Area. The subject lands have an estimated frontage of 49 metres along Central Avenue and an approximate area of 1,869 square metres (0.46 acres). An aerial image of the subject lands and surrounding neighbourhood is shown in Figure 1 below.



**Figure 1:** Aerial Imagery of the Subject Lands (Source: GeoWarehouse)

The subject property is currently a surface parking lot that does not contain any buildings or structures. Parking meters are located throughout the site. The subject property contains two (2) accesses from Central Avenue and can also be accessed via a laneway to adjacent property parking lots to the rear and east (leading to 204 & 206 Central Avenue and Hyman Street). Figure 2 provides a Streetview image of the subject property.



**Figure 2:** Street View Image of the Subject Lands facing North from Central Avenue (Source: Google Street View, December 2022)

## 2.2 Neighbourhood Context

The subject property is surrounded by a broad range of uses given its proximity to the downtown area. To the immediate north are low-rise residential buildings and a Law Office. Most buildings to the north range from one to three-storeys. Across Central Avenue, south of the subject property is a parking lot and a range of commercial uses including a Circle K Convenience store.

West of the subject property is a local bookstore, with low rise residential properties along Central Avenue to the west. East of the subject property are personal service commercial businesses and restaurant / take-out services along Central Avenue to the east.

Richmond Street is also within walking distance of the subject property, thus providing access to public transit that runs south into the downtown area. This will provide future residents with greater access to other areas of the City and Region for goods and services. On the east side of Richmond Street is Victoria Park, providing multi-use trails and open green space.

Further west is the Thames River which provides access to the Thames Valley Parkway trail and various green spaces located along the river.

The subject lands are located just north of the City's downtown area and are within proximity of the Rapid Transit Boulevard and Urban Corridor that runs parallel with Richmond Street. This makes for a short walking and cycling distance to the downtown area, as well as the broad range of commercial and institutional uses located along Richmond Street.

The following table highlights land uses within proximity of the subject lands. This table is to be read in conjunction with the Neighbourhood Context Map in Figure 3 below.

No.	Description
1	Commercial, Retail, Institutional, and Residential Uses
2	Commercial, Retail, Institutional, and Residential Uses
3	Victoria Park
4	London City Hall
5	Centennial Hall
6	London Downtown
7	Harris Park
8	Thames Valley Parkway trail
9	Commercial, Retail, Institutional, and Residential Uses
10	Ann Street Park



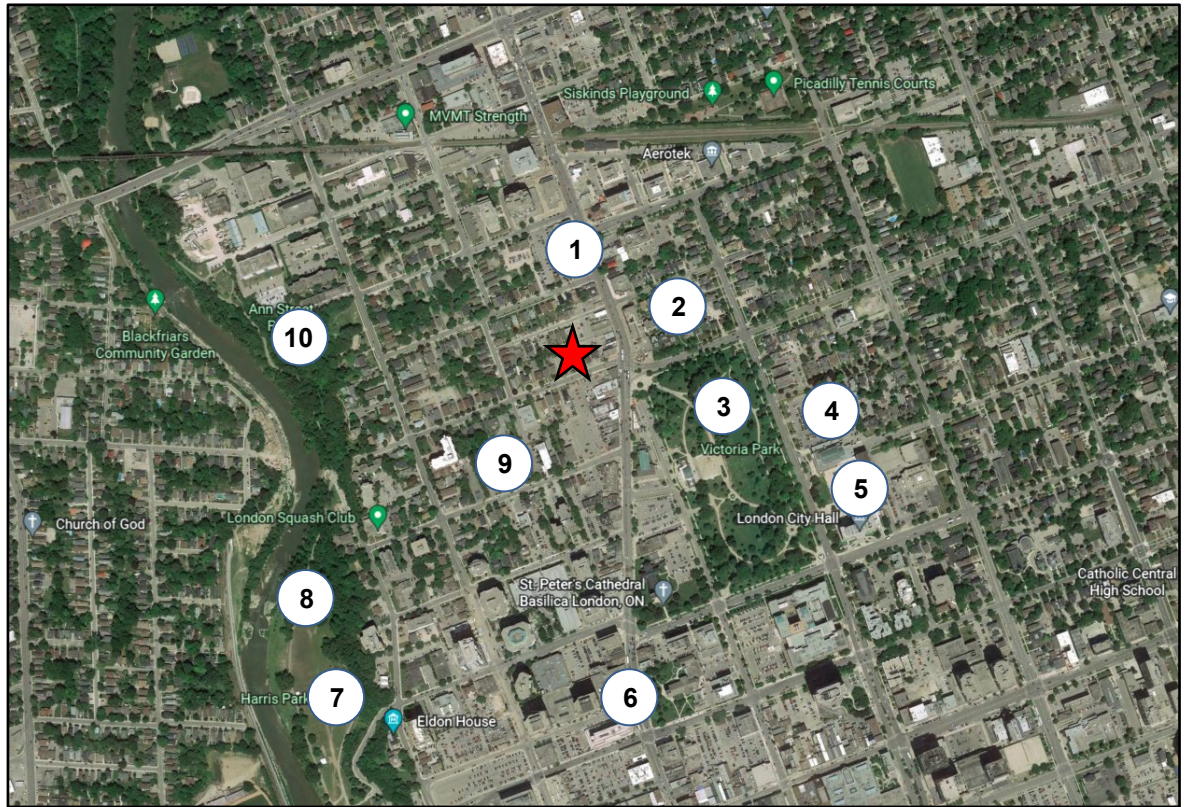


Figure 3: Neighbourhood Context Map (Source: Google Earth)

### 3 Proposed Development Concept

Our client is proposing to develop the lands with a 13 storey residential development consisting of 126 residential dwellings and two (2) levels of underground parking to provide 68 parking spaces. The design prepared by SRM Architects Inc. consists of a 3 storey podium, with stepbacks at Levels 4 and 10. Please refer to Figure 4 below for the Site Plan prepared by SRM Architects Inc.

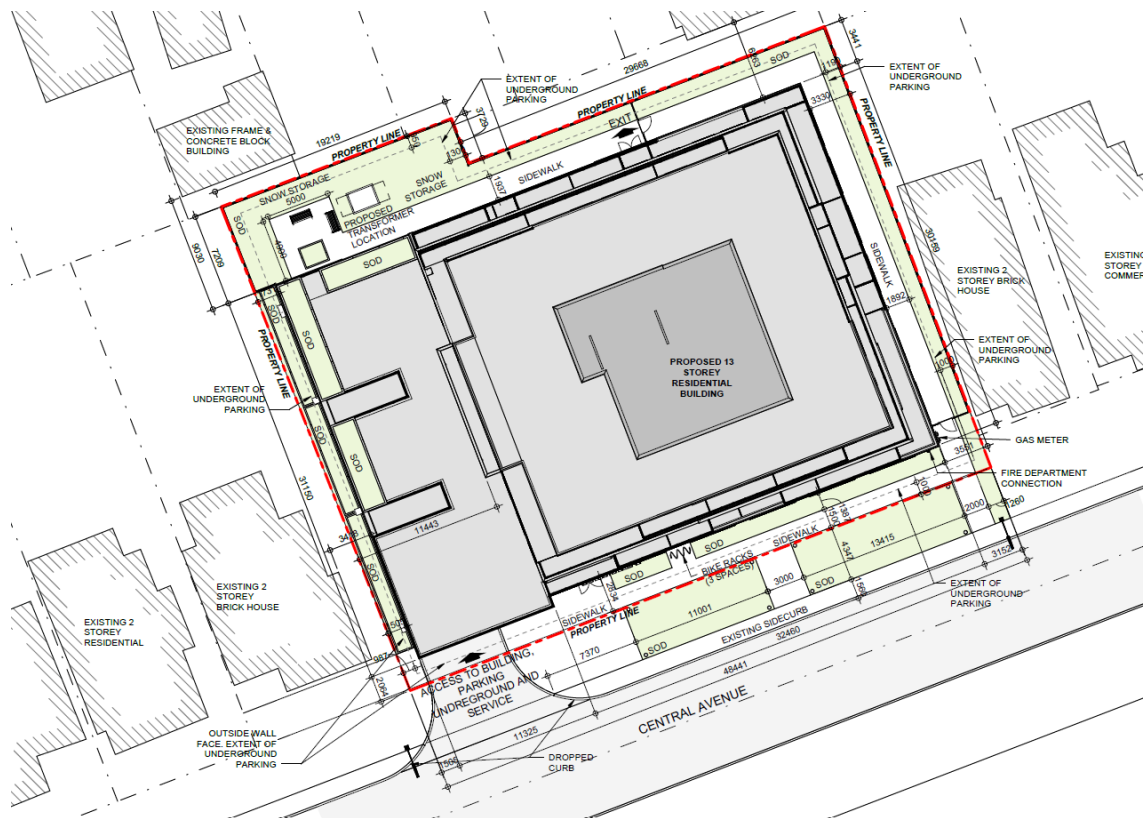


Figure 4: Proposed Site Plan prepared by SRM Architects Inc.

The ground floor consists of a central Lobby area leading to a mail room, moving room, internal garbage storage room, and elevators and stairways to the upper residential floors and underground parking. There are also private internal accesses to the 6 townhouse dwellings on the ground floor. The townhouse units also have an external private patio area and extend to the second floor.

Along the west side of the subject property is a driveway giving access to a drop off area, loading space and ramp to the underground parking. This area is covered and screened along the west side. An outdoor amenity area will be situated on the top of the covered area and can be accessed from the 3<sup>rd</sup> floor to provide private outdoor space for residents.

The second floor includes a large indoor amenity area along with 2 one-bedroom plus den units, and the upper level of the townhouse dwellings (that are not accessible from this level).

The third floor comprises mostly residential units with a smaller indoor amenity area which leads out to the outdoor amenity area over the driveway area (as previously mentioned).

Floors 4 to 13 consist of a mix of residential units with a central stairway and elevator. A mechanical penthouse is situated on top of the roof and will be screened from the street view.

The proposed development includes two (2) levels of underground parking. No surface parking is proposed. The underground parking area will provide a total of 68 spaces. Six (6) visitor parking spaces are included within the total parking count. Further, four (4) accessible spaces (2 Type A and 2 Type B) are provided and be accessed via a ramp at the north-west corner of the building.

The proposed development also includes a total of 114 bicycle parking spaces. 101 spaces are dedicated to long-term parking, while the remaining 13 are dedicated to short-term parking.

The proposed Site Plan and Building Elevations for this project have been prepared by SRM Architects Inc. and are included as part of the complete application. An analysis of the urban design and architectural elements are further discussed in the Urban Design Brief prepared by Arcadis.

### 3.1 Proposed Land Use Planning Applications

This section of the Report discusses the land use planning approvals required to accommodate the proposed development concept. The subject lands require a Zoning By-Law Amendment to advance the proposed development. A future Site Plan Application is also required to advance the proposed development.

#### 3.1.1 Official Plan Amendment

Based on previous discussion with City staff and the Record of Pre-Application Consultation dated June 24, 2022, it is our understanding the City of London has approved a new Official Plan, The London Plan (“LP”). The subject property is located within the High Density Residential Overlay Area where no specific density limit is stated for properties within the High-Density Residential Overlay Zone.

Therefore, an Official Plan Amendment is not required for the proposed development.

#### 3.1.2 Zoning By-Law Amendment

The zoning classification of the subject lands is to remain as R10-4, however, the applicant will be submitting the following Special Provisions (R10-4(#)) to permit:

- Permit a maximum building height of 13-storeys / 47.8 metres;
- Permit a maximum density of 678 units per hectare;
- Permit a minimum front yard setback of 3.0 metres;
- Permit a minimum interior side yard setback of 3.1 metres;
- Permit a minimum rear yard setback of 3.4 metres;
- Permit a minimum landscaped open space of 14.7%;
- Permit a maximum lot coverage of 70.5%;
- Permit a minimum long-term bicycle parking rate of 0.8 spaces per dwelling unit, and;
- The existing Temporary Use zone, T-70, be removed from the subject lands.

Please refer to Section 4.4.6 of this Report for additional details, as well as the Architectural Package prepared by SRM Architects Inc. for reference.

#### 3.1.3 Site Plan Application

The proposed development will be subject to Site Plan review and approval by the City of London. In accordance with City of London procedures, a Site Plan Pre-Submission Consultation Meeting was held to discuss the application.

It is anticipated that the formal Site Plan approvals process will be initiated following the initial review of the Zoning By-Law Amendment application by City, technical agencies, and consultation with City Council and area residents. It is understood that final approval of the Zoning By-Law Amendment application with no appeals will be required prior to the approval of the Site Plan application.

## 4 Land Use Planning Framework

The development of the subject property is guided by a range of Provincial legislation, The London Plan (Official Plan), City of London’s Zoning By-Law. This section of the Report discusses the application and how it adheres and responds to the applicable land use planning framework.

### 4.1 Planning Act

*The Planning Act*, R.S.O. 1990 sets out the legislative framework for land use planning in Ontario and provides the authority for the Minister of Municipal Affairs and Housing to issue policy statements and plans to guide land use planning and development in the province. The Act also sets out the legislative framework for local land use planning tools and plans, including Official Plans, Zoning By-Laws and Site Plan Approvals.

#### 4.1.1 Matters of Provincial Interest

Section 2 of the Planning Act outlines various “Matters of Provincial interest”, which decision-makers must have regard to in carrying out their duties under the Act. These Matters are summarized and addressed in the following table:

Provincial Interest	Demonstration of Regard
a) <b>The protection of ecological systems, including natural areas, features, and functions;</b>	<ul style="list-style-type: none"> <li>The subject property does not contain any significant natural features or areas, nor is it designated as a natural heritage area in the LP.</li> </ul>
b) <b>The protection of agricultural resources of the Province;</b>	<ul style="list-style-type: none"> <li>The lands are not identified as prime agricultural lands.</li> </ul>
c) <b>The conservation and management of natural resources and the mineral resource base;</b>	<ul style="list-style-type: none"> <li>No natural resources or mineral resources are anticipated to be impacted by the proposed development.</li> </ul>
d) <b>The conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;</b>	<ul style="list-style-type: none"> <li>A Heritage Impact Assessment (HIA) was prepared by MHBC. as part of a complete application package to review the relevant historical documents, evaluate potential cultural heritage value or interest, identify cultural heritage resources and assess potential impacts, and recommend mitigation options. A number of recommended mitigation and conservation measures were outlined in the report to mitigate the identified adverse impacts. Please see the HIA for details.</li> </ul>
e) <b>The supply, efficient use, and conservation of energy and water;</b>	<ul style="list-style-type: none"> <li>The proposed development will connect to existing municipal servicing. Please see the Functional Servicing Report and Stormwater Management Report for details related to this Matter of Provincial Interest.</li> </ul>
f) <b>The adequate provision and efficient use of communication, transportation, sewage and</b>	<ul style="list-style-type: none"> <li>It is anticipated that the proposed development will connect to existing communication infrastructure, which will be confirmed through the Site Plan approvals process. The proposed</li> </ul>



<p><b>water services and waste management systems;</b></p>	<p>development is also anticipated to connect to existing municipal servicing.</p>
<p><b>g) The minimization of waste;</b></p>	<ul style="list-style-type: none"> <li>The proposed infill development is located within the existing urban area of the City of London and is proposed to be connected to existing municipal servicing. It does not propose the expansion of infrastructure or the loss of greenfield land.</li> </ul>
<p><b>h) The orderly development of safe and healthy communities;</b></p>	<ul style="list-style-type: none"> <li>The proposed development facilitates intensification on an underutilized property within the City's urban boundary. The planned functions of the site is for high-density residential development.</li> <li>The site is located in close proximity of the downtown area where a mix of existing commercial, institutional, and residential buildings exist.</li> <li>The proposed development is located in walking/cycling distance to greenspaces/trails, as well as goods and services within the immediate area.</li> </ul>
<p><b>h.1) The accessibility for persons with disabilities to all facilities, services, and matters to which this Act applies;</b></p>	<ul style="list-style-type: none"> <li>The proposed development will conform to the minimum requirements of the OBC and the AODA to ensure that accessibility for persons with disabilities is provided.</li> </ul>
<p><b>i) The adequate provision and distribution of educational, health, social, cultural, and recreational facilities;</b></p>	<ul style="list-style-type: none"> <li>Not applicable.</li> </ul>
<p><b>j) The adequate provision of a full range of housing, including affordable housing;</b></p>	<ul style="list-style-type: none"> <li>The proposed development will contribute 126 dwelling units to the City's housing stock.</li> <li>The proposed development consists of range of studio, one-bedroom, one-bedroom plus den, two-bedroom units, and two-bedroom townhouse dwellings on the ground floor. These units have been tailored to the needs of young professionals.</li> </ul>
<p><b>k) The adequate provision of employment opportunities;</b></p>	<ul style="list-style-type: none"> <li>The proposed development will provide employment opportunities through construction and property maintenance. The proposed development does not contemplate commercial uses, as it is strictly residential.</li> </ul>
<p><b>l) The protection of the financial and economic well-being of the Province and its municipalities;</b></p>	<ul style="list-style-type: none"> <li>The construction of the development will contribute to the local economy for building supplies and labour.</li> </ul>
<p><b>m) The co-ordination of planning activities of public bodies;</b></p>	<ul style="list-style-type: none"> <li>The proposed development applications will be subject to municipal and agency review to ensure the coordination of development activities and the adherence of public policy.</li> </ul>

<p><b>n) The resolution of planning conflicts involving public and private interests;</b></p>	<ul style="list-style-type: none"> <li>• The development has been designed in order to minimize compatibility issues with adjacent commercial and residential lands, with the bulk of the massing being positioned to the south and east of the site addressing Central Avenue.</li> <li>• The intent of this design is to minimize shadowing and overlook onto adjacent lands, while conforming to the planned function of the site based on the LP designation and policies.</li> </ul>
<p><b>o) The protection of public health and safety;</b></p>	<ul style="list-style-type: none"> <li>• The proposed development will promote the protection of public health and safety by conforming to the requirements of the OBC and the AODA.</li> </ul>
<p><b>p) The appropriate location of growth and development;</b></p>	<ul style="list-style-type: none"> <li>• The LP identifies the lands within the ‘Neighborhoods’ Place Type, Primary Transit Area, and the ‘High Density Residential Overlay’, which permits high-rise apartments. It is understood that the planned function of the site supports high-density, transit-oriented development such as the development being proposed.</li> <li>• Further, the site is located along a ‘Neighbourhood Connector’ road and within proximity of “Rapid Transit Boulevard” which is supportive of intensive forms of housing. Therefore, the proposed development is located in an area intended for growth and development.</li> </ul>
<p><b>q) The promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;</b></p>	<ul style="list-style-type: none"> <li>• The subject property is extensively supported the London Transit Commission bus routes, including routes 4, 6, 13, 15, 90, 104 and 106 along Richmond Street. This will provide future residents transportation options and encourage the use of public transit.</li> </ul>
<p><b>r) The promotion of built form that,</b></p> <p><b>i) is well-designed,</b></p> <p><b>ii) encourages a sense of place, and</b></p> <p><b>iii) provides for public spaces that are of high quality, safe, accessible, attractive, and vibrant.</b></p>	<ul style="list-style-type: none"> <li>• The proposed development has been designed to acknowledge and compliment the neighbourhood which predominantly consists of residential, institutional, and commercial uses.</li> <li>• The proposed development aims to achieve a high level of urban design to create a unique sense of place for future residents and surrounding land uses in proximity to the downtown.</li> </ul>
<p><b>s) The mitigation of greenhouse gas emissions and adaptation to a changing climate.</b></p>	<ul style="list-style-type: none"> <li>• Energy saving and environmental design considerations will be implemented into the development which will be confirmed through the Site Plan Approval process.</li> </ul>

Based on the information presented in the table above, it is our opinion that the proposed development has regard for the 'Matters of Provincial Interest' set out by the Planning Act.

#### 4.1.2 Zoning By-Law Amendments and Site Plan Applications

The Planning Act establishes the legislative basis for Official Plan and Zoning By-Law Amendment applications, as well as Site Plan applications. The proposed applications are being requested pursuant to:

- Section 34 of the Planning Act, which establishes the legislative basis for Zoning By-Law Amendments; and
- Section 41 of the Planning Act, which establishes the legislative basis for Site Plan applications.

### 4.2 Provincial Policy Statement 2020

The Provincial Policy Statement (PPS) provides policy direction on matters of provincial interest related to land use planning and development. In accordance with the Planning Act, land use planning decisions are to be consistent with the PPS. The PPS sets the policy framework for efficient land use and development patterns that support sustainability by promoting strong, livable, healthy and resilient communities, protecting the environment and public health and safety, and facilitating economic growth, as follows:

Policy No.	Policy	Discussion of Consistency
<b>1.1 Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns</b>		
<b>1.1.1</b>	Healthy, livable and safe communities are sustained by: <ul style="list-style-type: none"> <li>a) promoting efficient development and land use patterns which sustain the financial well being of the Province and municipalities over the long term;</li> <li>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;</li> <li>c) avoiding development and land use patterns which may cause</li> </ul>	<ul style="list-style-type: none"> <li>a) The proposed development facilitates intensification within the City's urban boundary using existing municipal services, promoting the efficient use of land and infrastructure.</li> <li>b) The proposed development will add to a mix and range of residential units to the City's housing stock by providing apartment style and townhouse style units for young professionals. The range of studio units one-bedroom units; one-bedroom plus den units; two-bedroom units and two-bedroom townhouse dwellings will provide a variety of housing options.</li> <li>c) It is not anticipated that the proposed development will cause an environmental or public health</li> </ul>

	<p>environmental or public health and safety concerns;</p> <p>d) avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas which are adjacent or close to settlement areas;</p> <p>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;</p> <p>f) improving accessibility for persons with disabilities and older persons by addressing land use barriers which restrict their full participation in society;</p> <p>g) ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;</p> <p>h) promoting development and land use patterns that conserve biodiversity; and</p> <p>i) preparing for the regional and local impacts of a changing climate.</p>	<p>and safety concern. The proposed development will conform to the requirements of the OBC and the AODA.</p> <p>d) The proposed development will not prevent the efficient expansion of settlement areas, as it is located within the existing urban boundary.</p> <p>e) The proposed development facilitates intensification within the City's urban boundary. Existing services will accommodate this intensification, promoting a cost-effective development pattern and minimizing land consumption and servicing costs. The proposed development is also well-served by seven (7) bus routes along Richmond Street.</p> <p>f) The proposed development will conform to the requirements of the OBC and the AODA.</p> <p>g) It is anticipated that the necessary infrastructure, electricity generation facilities and distribution systems, and public service systems are available to meet the projected needs of the proposed development.</p> <p>h) No negative impacts to designated environmental features are anticipated.</p> <p>i) Energy saving and environmental design elements will be incorporated into the project, which will be confirmed through the Site Plan Approvals and Building Permit processes.</p>
<b>1.1.3 Settlement Areas</b>		
<p><b>1.1.3.1</b></p>	<p>Settlement areas shall be the focus of growth and development.</p>	<p>a) The proposed development will facilitate intensification within the City's urban boundary on a site that has been designated and zoned for intensification. The applicant is proposing a use</p>



		permitted by the LP approved by City Council.
<b>1.1.3.2</b>	<p>Land use patterns within settlement areas shall be based on densities and a mix of land uses which:</p> <ul style="list-style-type: none"> <li>a) efficiently use land and resources;</li> <li>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;</li> <li>c) minimize negative impacts to air quality and climate change, and promote energy efficiency;</li> <li>d) prepare for the impacts of a changing climate;</li> <li>e) support active transportation;</li> <li>f) are transit-supportive, where transit is planned, exists or may be developed; and</li> <li>g) are freight-supportive.</li> </ul>	<ul style="list-style-type: none"> <li>a) The proposed infill development will include the development of underutilized lands, existing municipal infrastructure, and is transit supportive.</li> <li>b) It is anticipated that the proposed development will connect to existing municipal services.</li> <li>c) Various energy saving and environmental design elements will be incorporated into the project, which will be confirmed through the Site Plan Approvals process.</li> <li>d) Various energy saving and environmental design elements will be incorporated into the project, which will be confirmed through the Site Plan Approvals process. The proposed development will provide residential uses within walking/cycling distance to the downtown, surrounding commercial, retail, and greenspace uses.</li> <li>e) The proposed development will connect to the existing municipal sidewalk system. This will support and encourage active transportation.</li> <li>f) The proposed development is also within walking / cycling distance of seven (7) LTC bus routes, thus providing greater mobility for future residents</li> <li>g) Not applicable.</li> </ul>
<b>1.4 Housing</b>		
<b>1.4.1</b>	To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of	

	<p>current and future residents of the regional market area, planning authorities shall:</p> <ul style="list-style-type: none"> <li>a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through residential intensification and redevelopment and, if necessary, lands which are designated and available for residential development; and</li> <li>b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned to facilitate residential intensification and redevelopment, and land in draft approved and registered plans.</li> </ul>	<ul style="list-style-type: none"> <li>a) The proposed development will provide for an opportunity to achieve infill development and will contribute to increasing the City's housing stock.</li> <li>b) The proposed development is located in an area of the City that has been designated and zoned to accommodate residential development and will connect to existing municipal services.</li> </ul>
<p><b>1.6.6 Sewage, Water and Stormwater</b></p>		
<p><b>1.6.6.2</b></p>	<p>Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services.</p>	<ul style="list-style-type: none"> <li>• The proposed development facilitates intensification within the City's urban boundary on lands that are underutilized. It is anticipated that existing municipal sewage and water services will support the proposed development.</li> </ul>
<p><b>1.6.6.7</b></p>	<p>Planning for stormwater management shall:</p> <ul style="list-style-type: none"> <li>a) be integrated with planning for sewage and water services and ensure that systems are optimized, feasible and financially viable over the long term;</li> <li>b) minimize, or, where possible, prevent increases in contaminant loads;</li> <li>c) minimize erosion and changes in water balance, and prepare for the impacts of a changing climate through the effective management of stormwater, including the use of green infrastructure;</li> </ul>	<ul style="list-style-type: none"> <li>• Stormwater management principles and best practices will be incorporated into the development and will be confirmed through the site plan approvals process.</li> </ul>

	<ul style="list-style-type: none"> <li>d) mitigate risks to human health, safety, property and the environment;</li> <li>e) maximize the extent and function of vegetative and pervious surfaces; and</li> <li>f) promote stormwater management best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development.</li> </ul>	
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Based on the foregoing, it is our opinion that the proposed Zoning By-Law Amendment required to advance the proposed development is consistent with the Provincial Policy Statement.

### 4.3 The London Plan

The City of London is currently working with two (2) Official Plans. The London Plan was adopted by City Council and then approved by the Province in December 2016 to replace the 1989 Official Plan. It is understood that the London Plan was appealed to the Ontario Land Tribunal (OLT). Through OLT decision on May 25, 2022, the final phase of policy appeals have been resolved and several site-specific appeals remain. As such, The London Plan is in force and the new official plan for the City of London.

#### 4.3.1 Place Type

The London Plan designates the subject property as ‘Neighbourhoods’, as shown in Figure 5 below. As per Table 10, Row 2 of the LP, permitted uses within the “Neighbourhoods’ Place Type for properties fronting ‘Neighbourhood Connector’ include Single-detached, semi-detached, Duplex, Converted dwellings, Townhouses, Additional residential units, Home occupations, Group homes, Triplexes, Small-scale, and Community facilities.

Table 11 of the LP states that the ‘upper’ maximum permitted height within the ‘Neighbourhood’ Place Type for properties fronting ‘Neighbourhood Connector’ is 4-storeys.

Notwithstanding the above policies pertaining to permitted uses and height/intensity, Section 920\_1 of the LP states, “Where more specific policies exist relating to permitted uses and intensity of development for an area or specific site, those more specific policies shall prevail.” Therefore, policies of the ‘High Density Residential Overlay Area’ applicable to the subject property supersede the permitted uses and intensity listed above. Please refer to Section 4.3.2 of this Report for analysis of the ‘High Density Residential Overlay Area’. It is our opinion that the proposed development is in conformity with these policies pertaining to use and intensity.

Section 936\_4 states, “Front yard parking will not be permitted on properties fronting a Neighbourhood Street or Neighbourhood Connector.” Given the subject property fronts a Neighborhood Connector, this policy applies. The proposed development does not include off-street parking that is located in the front yard. All off-street parking is located in the proposed two (2) levels of underground parking to ensure vehicular parking is not visible from the public realm. The proposed building is situated 3.0 metres from the front property line in order to activate the street frontage and create a pedestrian-oriented environment.

Section 937 of the LP provide policy direction with respect to residential intensification in the ‘Neighbourhood’ Place Type. The proposed development would be considered infill

development, as per Section 939\_5, given that the applicant is proposing to develop 126 dwelling units on an underutilized property that is currently a surface parking lot. It is our opinion that the proposed massing and built form, as well the placement and orientation of the building is compatible with the surrounding neighbourhood. The proposed setbacks allow for greater buffering and tower separation distances between the proposed tower and property lines, thus providing flexibility for a future development on the adjacent lots, as well as respecting the existing buildings today. It is our opinion that the proposed setbacks will provide a smoother transition in height between the adjacent buildings. Please also refer to the Urban Design Brief prepared by Arcadis for a discussion of urban design consideration pertaining to residential intensification, and how the proposed design meets the design objectives of the LP.

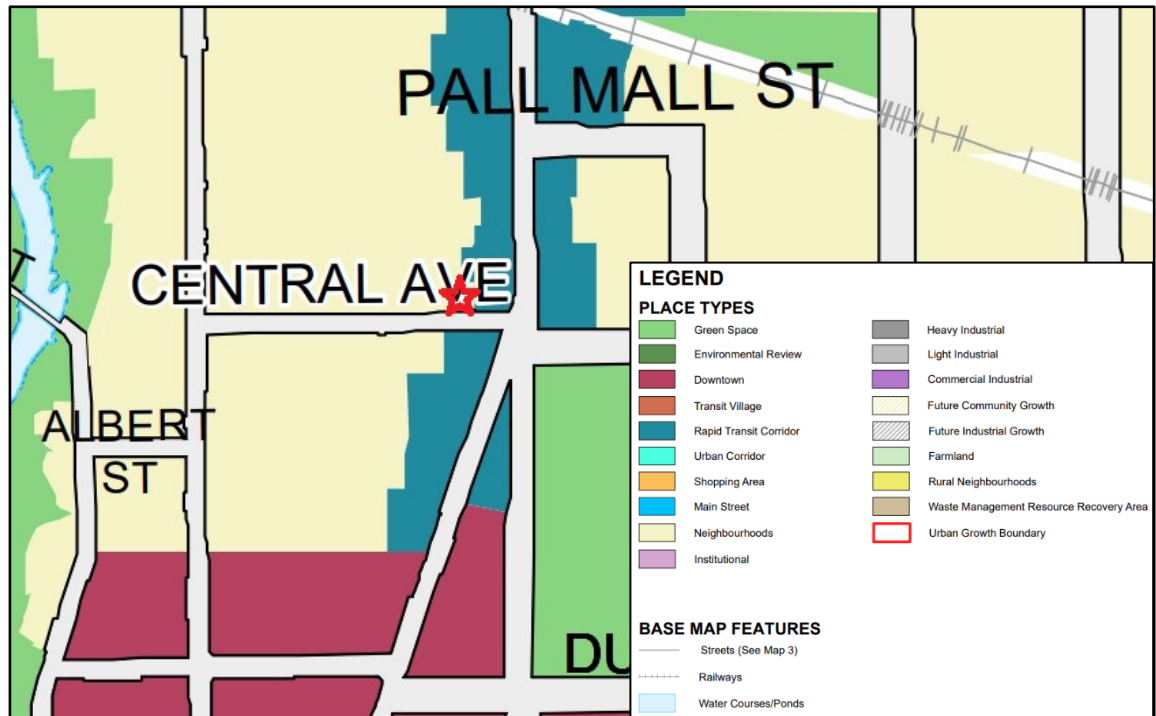
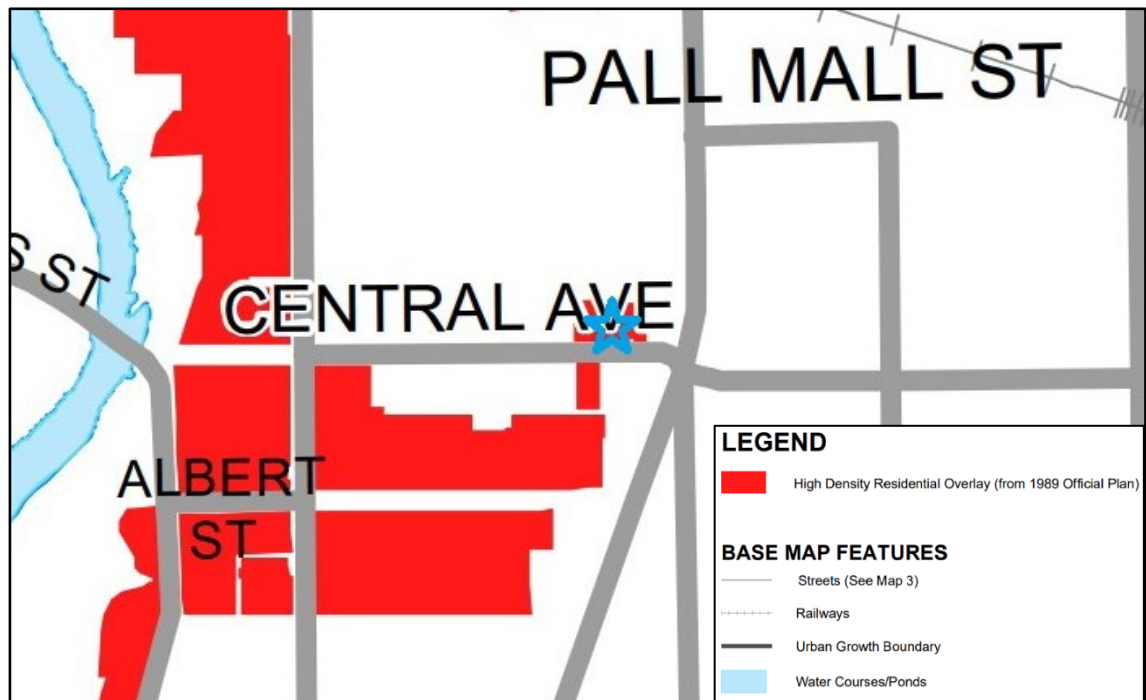


Figure 5: Excerpt of Map One – Place Types

#### 4.3.2 Hight Density Residential Overlay Area

The subject property is also within the ‘High Density Residential Overlay Area’ (HDRO), Map 2 (from the 1989 Official Plan), as shown in Figure 6 below. It is understood that development in HDRO areas should support and generate significant densities and have a maximum height of 12 storeys, however no density limits required.



**Figure 6:** Excerpt of Map Two – High Density Residential Overlay (from 1989 Official Plan)

Given that no density limits are required, the proposed maximum height of 13 storeys is necessary to facilitate the proposed density of 678 units per hectares (126 dwelling units total). It is our opinion that the proposed 13 storeys are appropriate in order to achieve the proposed density of 678 units per hectares for lands intended for high density residential use. It is our opinion that the proposed height and density are appropriate given the close proximity to the downtown core to the south and is less than 200 metres walk from a Rapid Transit Station and Clarence Street which is designated a ‘Rapid Transit Boulevard’.

Further, it is our opinion that the proposed height of 13 storeys is respectful of the adjacent buildings, as stepbacks are provided on Levels 4 and 10 in order to reduce the tower floorplate to achieve a tower that is not ‘slab-like’ and imposing. In addition, the proposed stepbacks allow for greater tower separation distances between the proposed tower and property lines, thus providing flexibility for a future development on the adjacent lots.

As previously mentioned, it is our opinion that the proposed height and density of the development are in keeping with the London Plan’s policy objective to promote transit-oriented development on underutilized lands intended for higher-density development. The proposed density will provide a range of housing types on lands within close proximity of the downtown core, where a number of goods and services are located. As such, it is our opinion that the proposed development meets the intent of the HDRO.

#### 4.3.3 Street Classification

The subject property fronts Central Avenue, which is designated as a ‘Neighbourhood Connector’ street and is also less than 200 metres walk from a Rapid Transit Station and Clarence Street which is designated a ‘Rapid Transit Boulevard’, as shown in Figure 7 below.

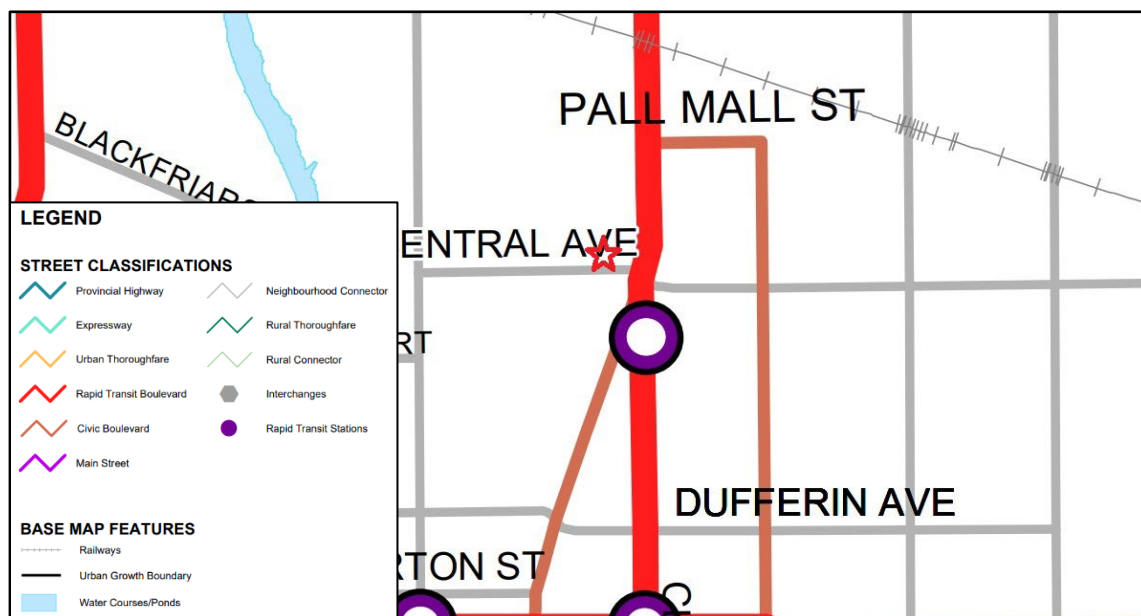


Figure 7: Excerpt of Map Three – Street Classifications

As per Section 372(7), ‘Neighbourhood Connector’ streets are intended to prioritize pedestrians; move low to medium volumes of cycle, transit and vehicle movements; minimize width of vehicle zone; achieve a high standard of urban design; and high quality pedestrian realm.

It is our opinion that the proposed development is supportive of the municipal road system, as well as the Clarence Rapid Transit Station based on the site’s proximity. The proposed development will connect to the municipal road system and provided a reduced front yard setback to create a pedestrian-oriented environment. One (1) vehicular access point is provided to minimize points of conflict between pedestrian and vehicular traffic. Further, the site is within close proximity to public transit routes, thus providing an excellent opportunity to develop the lands for a higher density residential use supportive of transit.

It should also be noted that a Transportation Impact Study (TIS) was prepared by GHD as part of a complete application package. Based on the study, it was determined that the proposed development will produce acceptable levels of traffic to Central Avenue and the surrounding area. Please see Section 6.2 of this Report for a summary of the TIS findings/conclusion.

#### 4.3.4 Active Mobility Network

The London Plan provides guidance and policies for other mobility choices, such as walking and cycling. These physical activities not only offer health benefits but have an impact on the quality of life, the environment and are environmentally more sustainable. As shown in Figure 8 below, the subject property is adjacent to cycling and walking routes along Central Avenue, which also connects to Victoria Park to the east. Further, the Thames Valley Parkway is directly west, just under 500 metres and is the City’s primary multi-use trail.



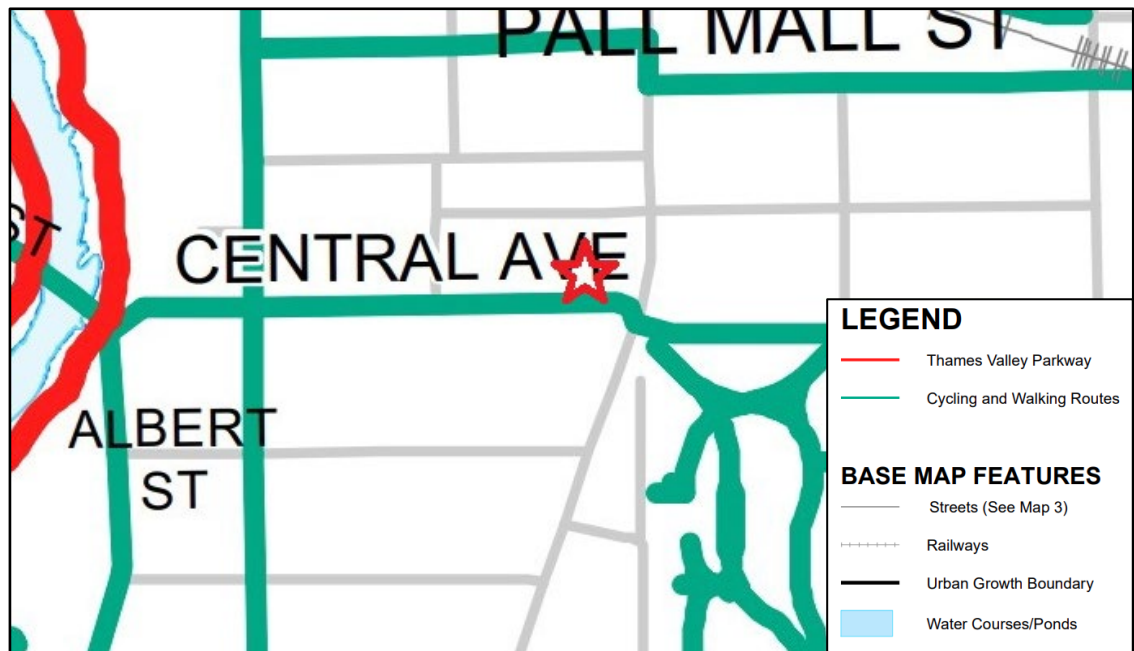


Figure 8: Excerpt of Map Four – Active Mobility Network

It is our opinion that the proposed development supports the City’s mobility network and encourages the active transportation. The proposed development will connect to the municipal sidewalk system, include a total of 114 bicycle parking spaces, and the proposed parking rate of 0.54 spaces/unit will incentivize more sustainable modes of transportation such as walking, cycling or public transit. Given the proposed development is adjacent the City’s active transportation network, this provides opportunities for residents to walk or cycle to goods and services, as well as green spaces within close proximity.

**4.3.5 Hazards and Natural Resources**

The subject property is within a ‘Significant Groundwater Recharge Area’ and ‘Highly Vulnerable Aquifer’ area, as shown in Figure 9 below. These designations aim, “to protect drinking water resources and to ensure high-quality drinking water supply and to address significant drinking water threats” (Section 1514). As per Section 1152 of the London Plan, Source Protection Plans and a hydrological study may be required to determine the impacts of development on the quality and quantity of the groundwater resources. Based on the Record of Pre-Application Consultation with City staff dated June 24, 2022, a study was not required for the Zoning By-Law Amendment submission.

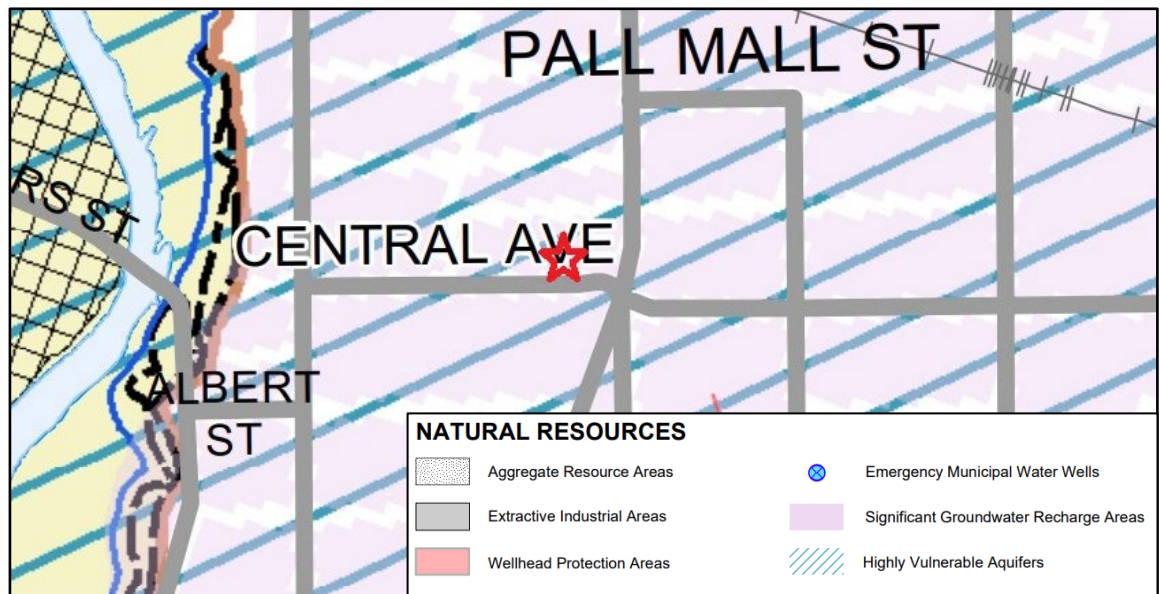


Figure 9: Excerpt of Map Six – Hazards and Natural Resources

#### 4.3.6 Special Policy Area 74

The subject property is located within Special Policy Area 74, which is identified as the ‘Talbot Mixed-Use Area’, as per Figure 10 below. According to Section 1030 in the LP, lands fronting Central Avenue between Talbot Street and the Richmond Row Commercial District, are appropriate for the development of a mixed-use corridor with a low profile which provides a transition between the higher intensity uses to the south and the lower intensity uses to the north. Further, Section 1027 also notes that lands within Special Policy Area 74 subject to the High Density Residential Overlay may be considered for high and medium density residential forms of development. These forms of development would need to provide a high standard of site and building design with emphasis on landscaped open space and underground or appropriately screened parking areas.



Figure 10: Excerpt of Map Seven – Special Policy Areas



Based on the policies applicable to Special Policy Area 74, the proposed 13-storey apartment is considered a permitted use and appropriate development for the site. The proposed development is mindful of the adjacent 1 to 3-storey buildings based on the siting of the building and aims to achieve a high standard of urban design. For example, the proposed development is street-oriented based on the siting of the podium, facing Central Avenue, and proposed front yard setback reduction. This will create a development that addresses Central Avenue and enhances the public realm for pedestrians.

In addition, the proposed development does not include surface parking, as the proposed 68 parking spaces will be located underground. This will provide screened parking from the public realm, as well as an opportunity to provide greater surface area for landscaping.

## 4.4 City of London Zoning By-Law

### 4.4.1 Residential Zone - R10-4

The subject property is zoned R10-4 (H26, OR5, T-70, D303) under the City of London's Zoning By-Law Z.-1. as shown in Figure 11 below. It is understood that the general purpose and intent of the R10-4 Zone is to provide the highest density residential developments in the form of apartment buildings. As such, permitted uses outlined in Section 14.2 of the Zoning By-Law include Apartment buildings, Lodging house class 2, Senior citizens apartment buildings, Handicapped persons apartment buildings, and Continuum-of-care facilities. The proposed residential development is considered a permitted use in the R10-4 Zone.

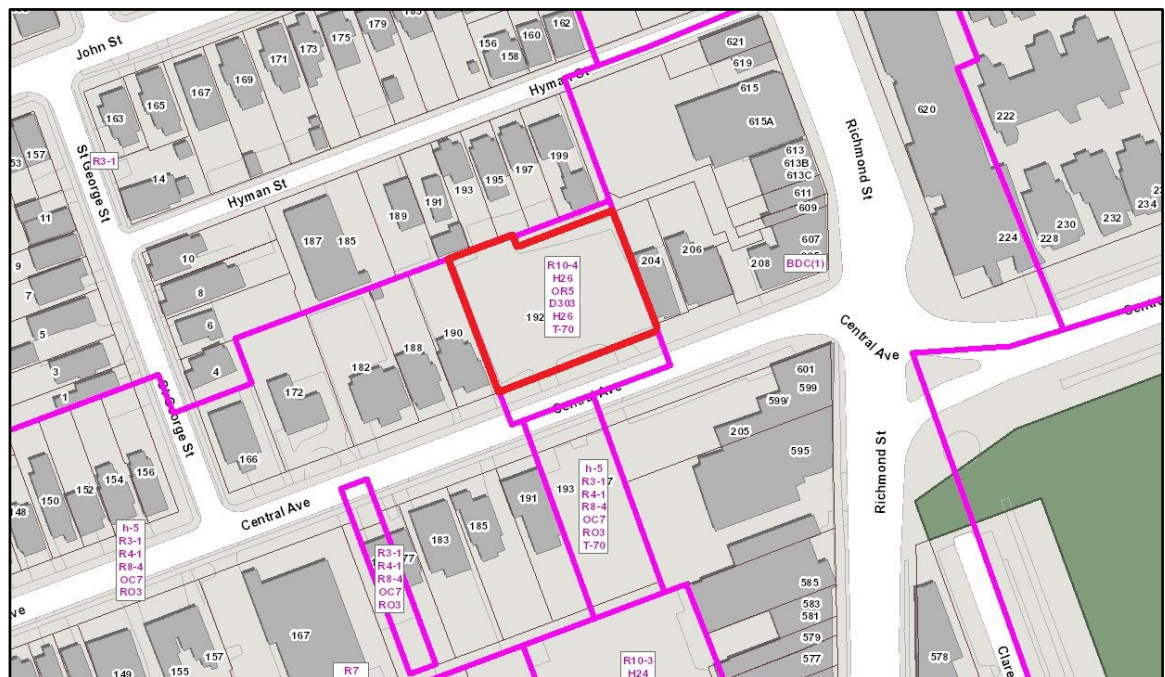


Figure 11: City of London Zoning By-Law – Interactive Mapping

### 4.4.2 Height – H26

Section 3.6 of the Zoning By-Law states where the symbol "H" follows a zone applying to certain lands on a zoning map, the number following the "H" specifies the maximum height in metres permitted on these lands. The existing R10-4 zone is followed by "H26", therefore, it is understood that the maximum permitted height on the subject property is 26 metres.

The proposed development will have a maximum height of 13-storeys / 47.8 metres, which exceeds the requirement. Therefore, a Special Provision to the R10-4(#) Zone is required. Please refer to Section 4.4.7 below of this Report for a breakdown of the requested Special Provision.

#### 4.4.3 Office Residential Zone – OR5

The lands are also subject to the Office Residential Zone variation, OR5. As per Section 16.1 of the Zoning By-Law, this zone is intended to regulate offices and residential uses within mixed-use buildings, generally within the transition areas between the Downtown and nearby residential neighbourhoods. Further, it is understood that apartment buildings may be permitted by compounding with the Residential R8, R9 or R10 Zones.

The OR5 Zone variation states that the following uses are permitted within an office-apartment building:

- a) Any use permitted in the OR Zone Variation;
- b) Business service establishments;
- c) Day care centres;
- d) Emergency care establishments.
- e) Personal service establishments;
- f) Restaurants eat-in;
- g) Retail stores;
- h) Studios.

The subject property does not contain any existing offices or residences, given the lands are used for commercial parking lot. While the applicant acknowledges the OR5 Zone is intended for mixed-use buildings, the proponent is seeking to develop the lands strictly for residential purposes.

#### 4.4.4 Temporary Zone – T-70

The lands are subject to a Temporary Use zone, T-70, which provides for and regulates temporary uses in accordance with Section 39 of the Planning Act. This zone permits temporary uses for a specified period of time after which the Temporary (T-\_) Zone symbol and text are removed and revert back to the main zone. It is not intended that a temporary zone will permanently establish a use on a property.

As per Section 50.2 of the Zoning By-Law, the existing T-70 Zone permits the following:

A commercial surface parking lot is permitted at 192-196 Central Avenue, 193-197 Central Avenue and 200 Albert Street, as shown on the map attached hereto comprising part of Key Map No. A107, for a temporary period not exceeding three (3) years from the date of the passing of this By-Law beginning June 24, 2014.

This Temporary Use is hereby extended for an additional three (3) years beginning October 30, 2017. (Z.-1-172623)

a) Regulations:

- i) Front Yard Setback 0.0 metres from the Original Central Avenue Street line (Z.-1-142313)

This Temporary Use is hereby extended for an additional three (3) years beginning May 25, 2021. (Z.-1-212935)

As a result of the proposed residential development, the lands will no longer be used for a commercial parking lot. Therefore, we request that the T-70 Zone be removed as part of the proposed Zoning By-Law Amendment application.

#### 4.4.5 Density – D303

Section 3.4 of the Zoning By-Law states where the symbol "D" follows a zone applying to certain lands on a zoning map, the number following the "D" specifies the maximum net residential density in units per hectare permitted on those lands. The existing R10-4 zone is followed by "H303", therefore, it is understood that the maximum net residential density on the subject property is 303 units per hectare.

The proposed development will have a maximum net residential density of 678 units per hectare, which exceeds the requirement. Therefore, a Special Provision to the R10-4(#) Zone is required. It is our opinion that the proposed density is in keeping with the planned function of the site, based on the policies outlined in the London Plan. The proposed development will provide both apartment-style and ground floor townhouse-style units within close proximity to the downtown area to the south and supported by rapid transit along Richmond Street. Please refer to Section 4.4.8 below of this Report for a breakdown of the requested Special Provision.

#### 4.4.6 Proposed Special Provisions

Based on the applicable zones, the following table provides a breakdown of the zoning regulations that are relevant to the proposed development. What is denoted in red in the table below is the requested Special Provision to the R10-4(#) Zone:

Regulation	Required	Proposed
<b>Residential Type</b>	Apartment Buildings and Special Populations Accommodations	Apartment Building
<b>Permitted Uses</b>	Apartment Buildings, Lodging house class 2, Senior citizens apartments, Handicapped persons apartments, Continuum-of-care facilities	Apartment Building
<b>Lot Area (min)</b>	1,000 m <sup>2</sup>	1,861.8 m <sup>2</sup>
<b>Lot Frontage (min)</b>	30.0m	49.0 m
<b>Front &amp; Exterior Side Yard depth (min)</b>	6.0m (local street) plus 1.0m per 10.0m of main building height (or fraction of) above first 3.0m	3.0 m
<b>Rear Yard depth (min)</b>	1.2m per 3.0m of main building height (or fraction of) but in no case less than 4.5m	3.4 m
<b>Interior Side Yard depth (min)</b>	1.2m per 3.0m of main building height (or fraction of) but in no case less than 4.5m	3.1 m
<b>Landscaped Open Space (min)</b>	20% (0.20 x 1,861.8 m <sup>2</sup> = 372.4 m <sup>2</sup> )	14.7%

		(273.76 m <sup>2</sup> / 1,861.8 m <sup>2</sup> = 14.7%)
<b>Coverage (max)</b>	45%	70.5% (1,312.38 m <sup>2</sup> / 1,861.8 m <sup>2</sup> = 70.5%)
<b>Height (max)</b>	H26 = 26.0 m	47.8 m (including MPH)
<b>Density (max)</b>	D303 = 303 units per hectare	678 units per hectare
<b>Parking (Section 4.19)</b>		
<b>Off-street Parking</b>	0.5 space per unit (apartment) (0.5 x 126 units = 63 parking spaces)	0.54 spaces per unit (68 total parking spaces)
<b>Parking provided to include: Accessible Spaces</b>	4% of parking spaces required where there are 101 – 200 parking spaces (0.04 x 63 spaces = 3 spaces)	4 spaces (2 Type A, and 2 Type B)
<b>Bicycle Parking – Long Term</b>	0.9 spaces per unit (126 x 0.9 = 113 space)	0.8 spaces per unit (101 spaces)
<b>Bicycle Parking – Short Term</b>	0.1 spaces per unit (126 x 0.1 = 13 spaces)	0.1 spaces per unit (13 spaces)

Based on the table above, the following Special Provisions are required to the R10-4(##) Zone:

- Permit a maximum building height of 13-storeys / 47.8 metres;
- Permit a maximum density of 678 units per hectare;
- Permit a minimum front yard setback of 3.0 metres;
- Permit a minimum interior side yard setback of 3.1 metres;
- Permit a minimum rear yard setback of 3.4 metres;
- Permit a minimum landscaped open space of 14.7%;
- Permit a maximum lot coverage of 70.5%;
- Permit a minimum long-term bicycle parking rate of 0.8 spaces per dwelling unit, and;
- The existing Temporary Use zone, T-70, be removed from the subject lands.

#### 4.4.7 Maximum Building Height

The applicant is proposing a maximum building height of 13 storeys (47.8 metres including the mechanical penthouse), whereas the Zoning By-Law requires a maximum building height of 24 metres or 12 storeys. It is our opinion that the proposed maximum building height of 47.8 metres is appropriate and should be supported in order to achieve the desired density on the subject lands that is supported and strongly encouraged by the ‘High Density Residential Overlay Area’, as per the London Plan. It is our opinion that the additional storey / height to the proposed

building will meet the planned function of the site and allow for more dwelling units within proximity to public transit, as well as goods and services within the downtown core to the south.

It is our opinion that the proposed height of 13 storeys is respectful of the adjacent buildings, as stepbacks are provided on Levels 4 and 10 in order to reduce the tower floorplate size to achieve a tower that is not 'slab-like' and imposing over the neighbouring lands. Further, it is our opinion that the proposed stepbacks allow for adequate tower separation distances from the property lines, which will provide flexibility for future buildings should they be developed on the adjacent lots.

It is our opinion that the proposed building height, in combination with the massing and built form, creates a development that it is respectful of the adjacent lands. It is further our opinion that the 13-storeys will not have adverse impacts due to shadowing, as well as privacy concerns, based on the proposed stepping and buffering around the site.

#### **4.4.8 Maximum Density**

The applicant is proposing a maximum density of 678 units per hectare, whereas the Zoning By-Law requires a maximum density of 303 units per hectare. It is our opinion that the proposed density exceedance is appropriate and should be supported, given that the subject lands are located within the 'High Density Residential Overlay Area', as per the London Plan. The intent of this overlay is to support high-density residential development that is pedestrian-oriented and supportive of public transit. It is our opinion that the proposed density achieves the objectives of these designations and is aligned with Provincial direction to provide housing within close proximity of MTSA's, notably the BRT. It is our opinion that the proposed development is aligned with the City's planned function of the site, which is encouraged to accommodate infilling and intensification of residential and mixed-use buildings.

The proposed development is also currently within walking/cycling distance of seven (7) LTC bus routes, which will support the use of transit and active modes of transportation by future residents. The subject property is less than 200 metres walk from a Rapid Transit Station and Clarence Street which is designated a 'Rapid Transit Boulevard'. Further, Central Avenue is an identified cycling and walking routes in the London Plan. The proposed development features a total of 114 bicycle parking spaces, which will promote active transportation. As such, it is our opinion that the proposed density will support the viability of these existing public transit routes and future routes within walking/cycling distance of the subject property.

#### **4.4.9 Minimum Front Yard Depth**

The applicant is proposing a minimum front yard depth of 3.0 metres. It is our opinion that the proposed minimum front yard depth is appropriate and should be supported, as a reduced minimum front yard depth allows the proposed building to address the streetscape and foster a stronger relationship between the private and public realm. It is our opinion that good urban design principles advocate for reduce front yard setbacks in order to site buildings closer to the street line and create a pedestrian-oriented environment.

To reduce concerns of massing and imposing over the public realm, the proposed building includes stepbacks at Levels 4 and 10. More specifically, from the front property line, Levels 4 to 9 will have a setback of 4.0 metres, and Levels 10 to 13 will have a setback of 4.0 metres. Therefore, it is our opinion that the proposed front yard depth is appropriate and has been addressed through additional stepbacks to ensure a smooth transition from the front lot line.

#### **4.4.10 Minimum Interior Side Yard Depth**

The applicant is proposing a minimum interior side yard depth of 3.1 metres. The proposed interior side yard deficiency is located on the eastern side of the proposed building and lot line. It

is our opinion that the proposed interior side yard depth deficiency is appropriate and should be supported, as the eastern property line will include landscape buffering, sidewalk, and fencing between the adjacent property. In addition, the interior side yard depth increases as you go up the proposed building due to the proposed setbacks at Levels 4 and 10. From the interior side yard on the east, Levels 4 to 9 propose a setback of 5.0 metres, and Levels 10 to 13 propose a setback of 6.0 metres. As such, it is our opinion that there is sufficient space and buffering between the proposed building and existing building on the adjacent lot to the east. The proposed setbacks will also allow sufficient separation should a future tower be developed on the adjacent lands to the east, given that they are designated as 'Rapid Transit Corridor' in the London Plan.

#### **4.4.11 Minimum Rear Yard Depth**

The applicant is requesting a minimum rear yard depth of 3.4 metres. It is our opinion that the proposed rear yard depth is appropriate and should be supported for the following reasons. The proposed development includes landscape buffering, as well as an internal sidewalk around the rear portion of the site in order to provide separation and buffering between the proposed building and rear lot line.

Further, the rear portion of the proposed building includes setbacks at Levels 4 and 10 in order to provide additional tower separation from the rear lot line and the highest portion of the proposed tower. From the rear property line, Levels 4 to 9 propose a rear yard setback of 4.8 m, and Levels 10 to 13 propose a rear yard setback of 6.28 metres. As such, it is our opinion that the setbacks provide adequate separation from the tower portion of the development and allows for sufficient separation should a future tower be developed on the adjacent lots to the rear.

#### **4.4.12 Minimum Landscaped Open Space**

The applicant is proposing a minimum landscape open space of 14.7%, whereas the Zoning By-Law requires 20%. It is our opinion that the proposed minimum landscape open space is appropriate and should be supported for the following reasons. The proposed development provides an outdoor amenity space, for a total of 271.61 m<sup>2</sup> located on the top of Level 3 that contemplates extensive soft and hard landscaping. While landscaping details will be finalized during the Site Plan Application stage, it is our opinion that the proposed outdoor amenity space will provide a balance between of green and urban space on the subject property and contribute to the overall greenery of the site.

Further, the proposed development is within walking and cycling distance of numerous open and green spaces in the surrounding neighbourhood. For example, this includes Victoria Park and Piccadilly Park to the east, as well as Ann Street Park and the Thames Valley Parkway trail network to the west that runs along the Thames River connecting to a variety of green space in the City.

#### **4.4.13 Maximum Lot Coverage**

As part of the proposed Zoning By-Law Amendment, the applicant is proposing a maximum lot coverage of 70.5%, whereas the Zoning By-Law permits a maximum coverage of 45%. This increased lot coverage is appropriate in this context for a number of reasons. Namely, the London Plan designates the site as within the Rapid Transit Place Type, where intensification is encouraged in order to support the viability of the planned BRT service.

It is also noted that while the lot coverage of the building is increasing, it is noted that the entirety of the subject property is paved and used for surface parking. Through the redevelopment of the subject property additional landscape areas will be added which will decrease the amount of impervious surface on the property. It is also noted that a large, raised amenity space is

proposed above the cantilevered portion of the building over the drive aisle. This will provide additional outdoor amenity space and landscaping which are aligned with the planning goals of maximum lot coverage standards. In our opinion this maximum lot coverage is appropriate for the subject lands and in keeping with the goals and objectives of the London Plan.

#### **4.4.14 Minimum Long-Term Bicycle Parking Rate**

The applicant is proposing a minimum long-term bicycle parking rate of 0.8 spaces/unit. It is our opinion that the proposed minimum long-term bicycle parking rate is appropriate and should be supported, as the deficiency of 12 spaces is considered minor in nature. The applicant is providing a total of 114 bicycle parking spaces on-site (101 long-term and 13 short-term) to promote the use of active transportation. The proposed development is also within walking distance of various goods and services, as well as seven (7) public transit routes, thus providing future residents multiple options for transportation.

## **5 Land Use Planning Rationale**

The following section of this Report summarizes the rationale in support of the proposed Zoning By-Law Amendment application.

### **5.1 Alignment with Overarching Planning Framework**

Based on the analysis provided in Section 4 of this Report, it is our opinion that the proposed development demonstrates regard for the “Matters of Provincial Interest” set out by the Planning Act and is consistent with the PPS. In our opinion, the proposed residential development provides context appropriate intensification of underutilized lands adjacent to the City’s downtown area. The proposed development supports the planned function of the site, given its proximity to the downtown and various transit routes along Richmond Street. It is our opinion that the proposed development is consistent with the London Plan.

### **5.2 Context-Appropriate Intensification**

As discussed previously, the subject lands are located adjacent to the City’s downtown area is intended for high density residential development, as per the ‘High Density Residential Overlay Area’ in the London Plan. It is our opinion that the proposed development is aligned with the City’s planned function of the site, which is encouraged to accommodate infilling and intensification of residential buildings.

It is our opinion that the proposed development is in keeping with the London Plan policies and is consistent in form and function with the surrounding area. The proposed development achieves the City’s goal towards intensifying lands within the ‘High Density Residential Overlay Area’. Therefore, it is our opinion that the proposed development is in keeping with the growth and policy direction of Provincial legislation.

### **5.3 Efficient Use of Infrastructure and Municipal Services**

The proposed development is anticipated to make efficient use of existing infrastructure and municipal servicing. Being located within the City’s urban boundary, the proposed development has access to full municipal services. In addition, the proposed development is located within walking/cycling distance of seven (7) LTC bus routes, which will support the use of transit and active modes of transportation by future residents.

## 5.4 Range and Mix of Housing Options

The Province of Ontario (as expressed through the PPS) and the City of London (as expressed through the London Plan), place a strong emphasis on the provisions of a range and mix of housing options to meet the needs of their residents. The proposed residential development encourages the intensification of underutilized lands in order to provide high-density residential units. This application supports the provision of a broader range of housing types and mix of housing options in the City of London.

## 5.5 Promotes the Health and Livability of the Local Community

The proposed development is located within walking/cycling distance to a broad range of commercial uses, institutional uses, and greenspace. Most notably, the proposed development is located adjacent to the City's downtown area, where a number of goods and services can be accessed by future residents. Further, given the subject lands are within proximity of seven (7) LTC bus routes along Richmond Street to the east, this may encourage the use of public transit and minimize dependency on independent motor vehicles. By encouraging or incentivizing active forms of transportation, this may improve the health and well-being of future residents. It is our opinion that the proposed development supports the development of a healthy and livable community within the City of London.

# 6 Supporting Studies and Background Reports

As part of the complete application for the proposed Zoning By-Law Amendment, the following supporting studies have been prepared and submitted for City and Agency review. This section will provide a brief overview of the findings and conclusions of each of these supporting studies.

## 6.1 Stage 1 and 2 Archaeological Assessment

A Stage 1 and 2 Archaeological Assessment was prepared by Lincoln Environmental Consulting Corp. (LEC) as part of the complete application. The subject lands are adjacent to several listed properties on the City's Register of Cultural Heritage Resources, including 190 and 204 Central Avenue, and 195, 197 and 199 Hyman Street. The subject lands are also located in the North Talbot area, which has been identified as future potential heritage conservation district (Heritage Places 2.0). It is also identified on the City's Archaeological Mapping. As such, a Stage 1 and 2 Archaeological Assessment was requested by City Staff in order to evaluate the archaeological potential of the subject lands.

The Stage 1 Archaeological Assessment of the subject lands determined that the study area exhibited high potential for the identification and recovery of archaeological resources, thus warranting a Stage 2 Archaeological Assessment. It was determined by LEC that no archaeological resources were identified during the Stage 2 Archaeological Assessment of the study area, and as such, no further archaeological assessment of the subject property was recommended.

## 6.2 Transportation Impact Study

A Transportation Impact Study (TIS) was prepared by GHD to determine the traffic-related impacts on the roadway system due to the proposed development traffic, and to determine the proposed parking supply is adequate to accommodate the future site parking demands. The TIS also provides Transportation Demand Management (TDM) measures.



It was determined that the proposed development will generate a total of 12 inbound and 35 outbound automobile trips during AM peak hour, and 35 inbound and 21 outbound automobile trips during PM peak hour. It was concluded that under the future traffic forecasts, the traffic generated by the proposed development along with non-site related traffic growth can be accommodated by the abutting street system. The traffic generated by the proposed development does not add significant adverse impacts on the study intersections. As such, no additional road improvements are triggered by the proposed development.

Further, the Institute of Transportation Engineers (ITE) parking demand rates contained in the Parking Generation portion for the report found that the proposed development would require a total of 59 parking spaces. GHD concluded that the proposed 68 parking spaces will meet the ITE parking demands and provide a surplus of 9 spaces beyond what is anticipated to be required.

### 6.3 Urban Design Brief

An Urban Design Brief was prepared by Arcadis as part of the complete application. This study provided an overview of the urban design framework applicable to the site, the existing conditions of the property and its neighbourhood context and summarized how the design of the proposed development reflects the urban design objectives of The London Plan.

### 6.4 Heritage Impact Assessment

A Heritage Impact Assessment (HIA) was prepared by MacNaughton Hermsen Britton Clarkson Planning Limited (MHBC) to review the relevant historical documents, evaluate potential cultural heritage value or interest (CHVI), identify cultural heritage resources and assess potential impacts, and recommend mitigation options. The HIA determined that the properties located at 190, 191 and 204 Central Avenue, 205 Central Avenue/ 599-601 Richmond Street and 195, 197 and 199 Hyman Street have Cultural Heritage Value or Interest as per O. Reg. 9/06.

Based on the work completed by MHBC, the following was concluded:

- *Negligible impact of indirect obstruction of views as it relates to the kinetic views of the properties located at 190 and 204 Central Avenue and the background view of the properties along Hyman Street; and,*
- *Potential impact as a result of land disturbances as it relates to construction activities, particularly the two-level underground parking garage which is within close proximity (2-6 metres) of excavation. There is also potential impact as a result of changes to grade and accidental damage from construction activities, equipment and material.*

In order to address the above impacts, mitigation and conservation measures were recommended in the HIA. These included increased step backs on the front (south) and step back along the east elevation, as it relates to the building located at 204 Central Avenue. Further, a landscape plan that provides a transitional buffer between the new development and surrounding area to integrate the new building into the mature neighbourhood and conserve views. Also, a Temporary Protection Plan is recommended to be completed, specific to the construction period for the properties located at 190 and 204 Central Avenue and 199 Hyman Street. Please see the full HIA for specific details pertaining to the mitigation and conservation measures.

## 7 Conclusions and Recommendations

This Report provides an overview of the proposed development of the subject lands known municipally as 192-196 Central Avenue in the City of London, as well as the surrounding context and the applicable land use planning policy. It also describes the required Zoning By-Law Amendment Application process and future Site Plan Approval to permit the proposed development.

Based on the rationale provided in this Report, it is our opinion that the proposed Zoning By-Law Amendment is justified, has regard to the “Matters of Provincial Interest” set out in the Planning Act and is consistent with the PPS. It is further our opinion that this application serves the public interest and overall facilitates good planning.

It is, therefore, our recommendation that the City of London:

- Together with the completed application forms and fees, deem the Zoning By-Law Amendment application complete and process the application in accordance with the municipal process;
- Schedule a Public Meeting to obtain comments from neighbouring residents, applicable commenting agencies and Council; and
- That City staff Circulate the application materials, including this Report, to the City of London Council, technical review agencies, and the community as appropriate.

Yours truly,

**ARCADIS PROFESSIONAL SERVICES (CANADA) INC.**



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