



PLANNING & DESIGN REPORT

Zoning By-law Amendment

1151 and 1163 Richmond Street

London, Ontario

March 2024



MHBC
PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE

PLANNING & DESIGN REPORT

1151 and 1163 Richmond Street
City of London

Prepared For: University of Western Ontario
Date: March 2024

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1.0 Introduction

1.1 Overview

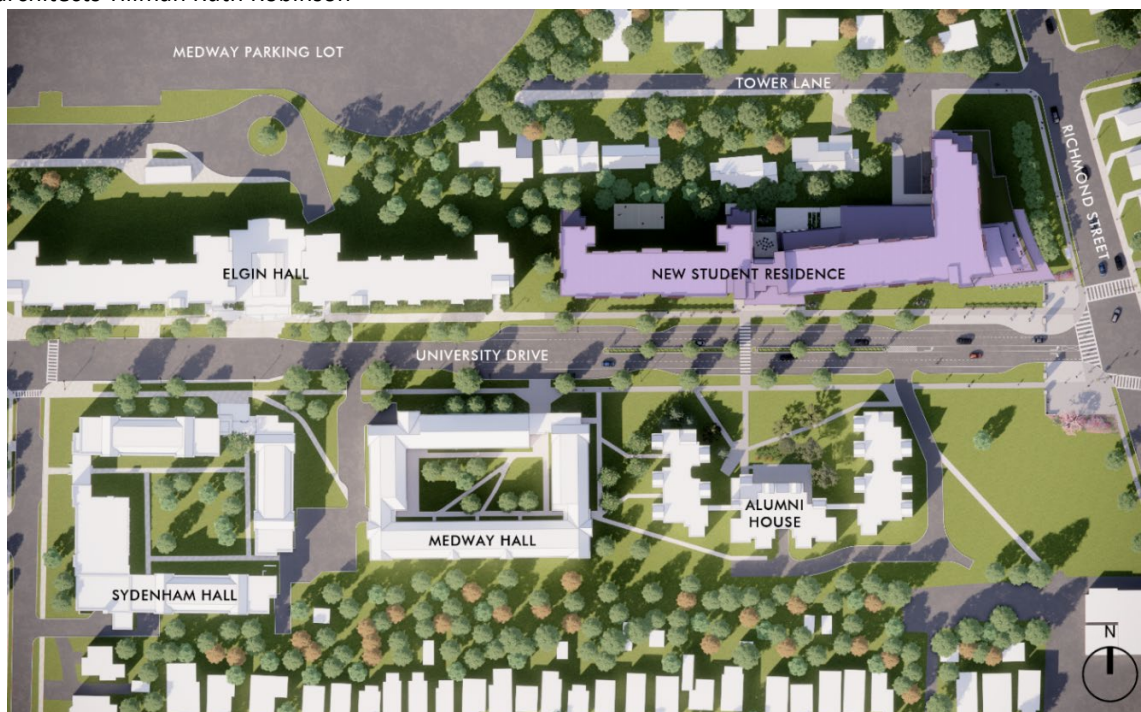
MacNaughton, Hermsen, Britton, Clarkson Planning Limited (“MHBC”) has been retained by the University of Western Ontario (“Western”) to prepare a Planning & Design Report in support of a Zoning By-law Amendment application for lands addressed as 1151 and 1163 Richmond Street in the City of London (hereinafter referred to as the “subject lands” or “site”).

1151 Richmond Street comprises the eastern part of the main Western campus. The portion of this campus proposed to be developed as part of this application is currently vacant and is located at the northeast corner of the Richmond Street and University Drive intersection, surrounded by existing student residences. 1163 Richmond Street is owned by Western and contains a former Bank of Montreal building that has been converted into a University services use (Child and Youth Development Clinic). Collectively, the subject lands measure approximately 1.4 hectares in area (all measurements herein are approximations).

An eight storey student residence is planned for the subject lands, containing 259 residential suites and an anticipated yield of 772 beds (refer to **Figure 1**; proposed development shown in purple). As part of this project, a two storey dining area is proposed fronting Richmond Street, with the main building entrance oriented to the University Drive corridor.

Figure 1: Proposed Development

Image: architects Tillman Ruth Robinson



Pursuant to the permissions of the City's Official Plan ("The London Plan"), the subject lands are designated Institutional and front on a Rapid Transit Boulevard. As discussed further in this Report, this arrangement permits student residences with a standard height permission between two (2) and 12 storeys, with an upper maximum height permission of 15 storeys. With respect to permissions under City of Zoning By-law No. Z.-1 ("Zoning By-law", 1151 Richmond Street is zoned Regional Facility (RF) and 1163 Richmond Street is zoned Regional Facility Special Provision (RF(7))). Student residences are permitted in the RF zone, however the RF(7) Zone variation excludes student residences, licensed drinking establishments, and restaurants and establishes site-specific provisions including a maximum height of 8.0 metres.

In effect, the proposed Zoning By-law Amendment would replace the aforementioned RF and RF(7) Zones with a new RF Special Provision (RF(_)) Zone applicable to the entirety of the subject lands. The proposed RF Zone exception integrates site-specific building setbacks that are intended to accommodate the scale and positioning of the planned residence.

The planning merits of this proposal are evaluated in detail within this Report and are summarized below:

- The application supports the development of lands located within the City's Urban Growth Boundary and designated for institutional uses pursuant to The London Plan;
- The site is well suited for the proposed development, given its physical dimensions and its location within a largely residential area of Western that has convenient access to public transit, active transportation opportunities, commercial services and campus amenities;
- The introduction of an additional 259 residential units within the campus setting: responds to demand for student housing; helps to address housing needs within the City at large; and supports the continued growth and development of Western as a major educational institution;
- Design components integrated into the proposal would contribute positively to the local streetscape and are intended to be compatible with, and complementary to, the surrounding neighbourhood;
- The Bank of Montreal Building, which is a listed heritage property, has been evaluated in a Heritage Impact Assessment and determined not to meet criteria for designation;
- Preliminary assessments indicate that adequate road and servicing infrastructure is available to accommodate the proposed development;
- The planned residence has been designed in accordance with the terms of the Master Development Agreement between Western and the City of London;
- The requested Special Provision supports the design objectives of The London Plan and aligns with the intent of the applicable Zoning By-law regulations; and,
- In our opinion, this proposed development consistent with the Provincial Policy Statement and conforms to the policy direction and permissions of the City's Official Plan.

In light of these considerations, it is our opinion that this proposal is appropriate for the subject lands,

compatible with the local development context, and should not generate significant land use conflicts with adjacent properties.

1.2 Report Framework

This Planning Justification Report has been prepared for submission to the City of London in support of the aforementioned Zoning By-law Amendment (“ZBA”) application and includes these primary components:

- An introduction and general description of the subject lands, surrounding uses and existing conditions, to provide an understanding of the locational context;
- An overview of the proposed development;
- A description of the overall land use planning and design elements of the proposed development;
- A summary of the proposed Zoning By-law Amendment; and,
- A review of the proposal relative to the applicable planning framework, including an assessment of the project’s: consistency with the Provincial Policy Statement, conformity with The London Plan, and compliance with development regulations of the Zoning By-law.

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

- Provincial Policy Statement (2020)
- The London Plan;
- City of London Zoning By-law No. Z.-1; and,
- Master Development Agreement between Western and the City of London.

1.3 Planning Applications

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

Table 1: Required Planning Applications

Planning Application	Approval Authority
Zoning By-law Amendment To apply a new RF Zone exception to the subject lands to accommodate the proposed residence.	City of London
Site Plan Approval Future application	City of London

A Pre-submission Consultation Meeting was held with City of London staff on August 29, 2023 to discuss the proposed development. City staff identified that the following submission materials are required for a complete Zoning By-law Amendment application:

- Planning & Design Report
- Urban Design Peer Review Panel Review and Response

- Urban Design Brief
- Stage 1-2 Archaeological Assessment
- Heritage Impact Assessment
- Record of Site Plan Consultation
- Tree Preservation Plan
- Servicing Report
- Transportation Impact Study
- Community Information Meeting
- Zoning Referral Record

Subsequent to the Pre-submission Consultation Meeting, City of London staff waived the requirement for a Transportation Impact Study. In lieu of this study, Western has prepared a Parking Impact Assessment.

All required reports, studies and plans have been prepared in support of the ZBA application. Summaries of the technical reports are provided in Section 5.0 of this Report.

2.0 Context

2.1 Site Location and Description

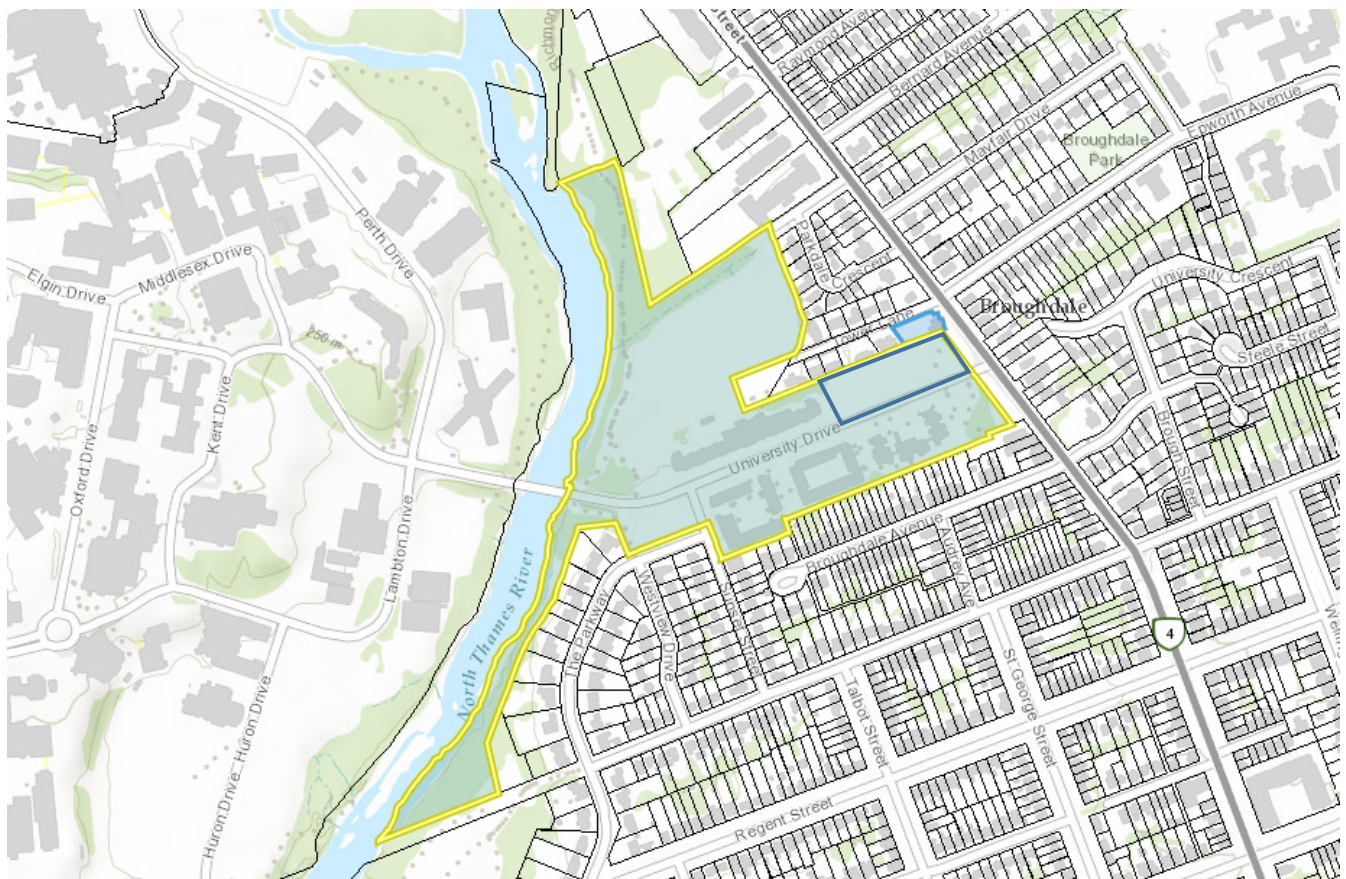
2.1.1 Location

The subject lands form the eastern portion of the main University of Western Ontario campus, and are situated on the east side of the Thames River. The property addressed as 1151 Richmond Street, shown outlined in yellow in **Figure 2**, is developed with University buildings including an adjacent student residence (Elgin Hall). The portion of 1151 that is subject to the proposed development is outlined in dark blue in Figure 2.

1163 Richmond Street, outlined in light blue in Figure 2, is occupied by a former Bank of Montreal building that has been converted by Western for institutional uses.

Figure 2 – Site Location

Image: City of London



Collectively, the subject lands measure 1.4 ha in size and have approximately 106 metres of frontage on Richmond Street, 52 metres of frontage on Tower Lane, and 614 metres of frontage on University Drive.

The portion of 1151 Richmond Street that is subject to the proposed development is currently vacant and includes a beach volleyball court fronting onto University Drive and bus stops along Richmond Street and University Drive (**Figure 3**). The existing building on 1163 Richmond Street, the former Bank of Montreal building, is proposed to be demolished to accommodate the proposed development (**Figure 4**). Entrance gates to the Western campus are located east of the subject lands at the entrance to University Drive from Richmond Street.

Figure 3 – Proposed Development Area (1151 Richmond Street) Looking West to Elgin Hall

Image: MHBC (October 23, 2023)



Figure 4 – Existing Site (1163 Richmond Street), Looking West to the Former Bank of Montreal Building

Image: MHBC (October 23, 2023)



2.1.2 Transit Service and Connectivity

The subject lands are well served by public and active transportation options. London Transit service is available along University Drive and Richmond Street, with bus stops located adjacent to the subject lands and the University Gates (refer to **Figure 5**). Sidewalks are available on both sides of Richmond Street and University Drive, as well as the south side of Tower Lane nearest the subject lands. Pedestrian pathways are provided throughout campus along desire lines, connecting the subject lands to surrounding destinations on campus. University Drive includes an on-road bicycle lane, providing a direct connection through the campus from King's Campus and the residential area to the east via a path from University Crescent.

Figure 5 – Two London Transit Bus Stops (Shown with Arrows) Adjacent to the Subject Lands

Image: Google



2.1.3 Cultural Heritage

1151 Richmond Street is listed on the City of London Heritage Registry with regard to several existing University buildings (e.g. Hume Cronyn Memorial Observatory, Medway Hall). The University Gates, which are adjacent to the project site, are also listed within the Registry. Further, 1163 Richmond Street is identified as a listed property with regard to the former Bank of Montreal building shown in **Figure 4**.

A Heritage Impact Assessment (HIA) has been prepared to address the proposed demolition of the Bank of Montreal building and the potential impact of the project on identified cultural heritage resources in the vicinity of the site. The findings of the HIA are summarized in Section 5.2 of this Report.

2.1.4 Natural Heritage and Natural Hazards

The lands do not contain any features with natural heritage significance pursuant to Map 5 (Natural Heritage) of The London Plan. Map 6 (Hazards and Natural Resources) does identify that the northern portion of the site is located within the Regulation Limit of the Upper Thames River Conservation Authority (UTRCA). These lands are subject to a two zone flood approach in accordance with the aforementioned Master Development Agreement. As a result a UTRCA permit will be required prior to development.

2.1.5 Landscaping

The subject lands contain mature trees that were planted for landscaping purposes and have been assessed in the Arborist Report and Tree Preservation Plan summarized in Section 5.5 of this Report.

2.1.6 Site Servicing and Grading

The subject lands are relatively flat with little topographic relief evident throughout the site. These lands have access to municipal water and wastewater services. A Stormwater Management Report has been prepared to assess stormwater management options for the proposed development. The findings of the assessment are summarized in Section 5.3 of this Report.

2.2 Surrounding Uses

The subject lands are located on the Western campus in an area occupied principally by existing student residences, including Elgin Hall, which is immediately west of the site. Beyond the campus, the lands are located in a mixed-use area that is generally comprised of low density residential development with convenience commercial uses located along Richmond Street. High rise residential buildings are located north of the subject lands along Richmond Street.

Surrounding land uses are summarized below (**Figure 6**):

Figure 6
Surrounding Land Uses

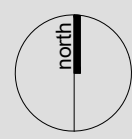
1151 Richmond St
 1163 Richmond St
 City of London
 County of Middlesex

LEGEND

- Subject Lands
- 400m & 800m Walking Distance
- School/Institutional
- Park/Open Space
- Bus Route
- Bus Stop
- Multi-Use Trails



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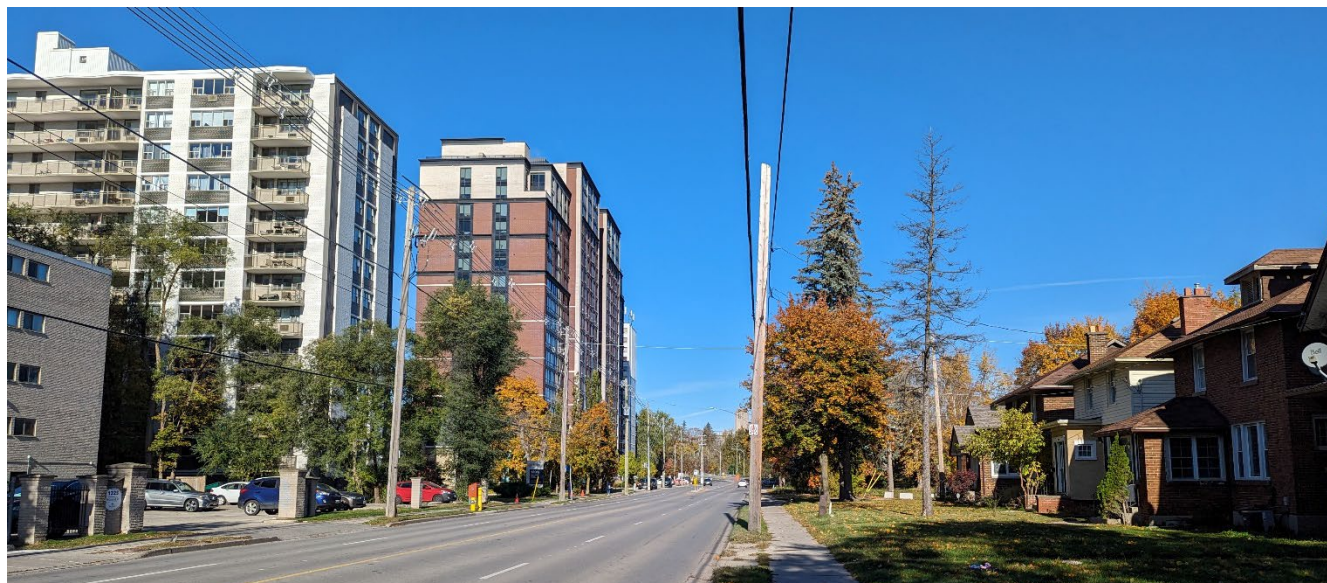


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- North:** A low-rise residential neighbourhood is located north of the lands along Tower Lane and Parkdale Crescent. High-rise residential buildings are located approximately 300 metres north of the subject lands and vary between eight (8) and 19 storeys (**Figure 7**). A large surface parking lot is situated to the north of Elgin Hall and provides parking for the university campus.
- South:** Low-rise residential forms predominate lands to the south, with limited commercial uses also fronting Richmond Street immediately north of the Broughdale Avenue intersection. Central London, which includes the City’s downtown core, is located 1.7 kilometres south of the subject lands.
- East:** A low-rise residential neighbourhood and King’s University College are located east of the subject lands. Further east, the North London Athletic Fields are located along the Thames River corridor and are accessible via the City’s active transportation system (e.g., multi-use pathways, sidewalk network).
- West:** The Western campus and the Thames River corridor are located west of the subject lands. The University Hospital / London Health Sciences Centre is additionally located west of the site. The subject lands are well connected to the surrounding campus through a private street network, cycling paths, sidewalks, and trails.

Figure 7 – High-Rise Buildings 300 Metres North of the Subject Lands, Adjacent to Low Density Residential

Image: MHBC (October 23, 2023)



3.0 Proposal

3.1 Proposed Development

3.1.1 Overview

Western is proposing to amend the current zoning that applies to the subject lands to permit the development of an eight storey student residence with an anticipated yield of 772 beds in 259 residential suites (**Figure 8**). The residence will be dormitory style with 13 additional Don suites providing supervision and support for students. Each residential floor includes two barrier free suites and shared study and lounge rooms.

The building includes a 350 person dining hall and servery on the ground floor fronting on Richmond Street with glazing and a dining hall patio facing University Drive (**Figure 9**). Lounges, study rooms, laundry facilities, music rooms, meeting rooms, and support spaces are additionally provided within the building.

Figure 9 – Rendering from Richmond Street

Image: architects Tillman Ruth Robinson



Outdoor amenity spaces include a landscaped courtyard and outdoor volleyball sand court at the north of the proposed building, replacing the existing outdoor volleyball court that will be removed to accommodate the proposed development. The existing bus stops along Richmond Street and University Drive will be retained. Further, the University Gates at the entrance to University Drive will be retained.

In summary, the proposed building will have a total floor plate of 3,928 m², a gross floor area of 28,727 m² and a total height of 27 m. Pedestrian access is provided from Richmond Street and University Drive, with the primary entrance from University Drive. Parking is provided campus-wide, with the nearest parking lot approximately 100 m from the subject lands behind Elgin Hall Residence. An additional four parking spaces and a loading/receiving area are proposed at the north of the subject lands for employees and deliveries. This service entrance is to utilize the Tower Lane access that currently serves the Child and Youth Development Clinic.

Bicycle parking is to be provided by way of 28 outdoor spaces adjacent to the main entrance from University Drive, with an additional 37 indoor parking spaces provided in the basement, for a total of 65 spaces. Waste and recycle storage is to be provided in the basement of the building and would be picked up from the existing Tower Lane access.

A lay-by drop off area is proposed along University Drive, providing an area for deliveries and drop offs. A loading area is provided along Tower Lane.

The building façade consists of elements of collegiate gothic campus architecture, with the ground floor utilizing transparent glazing for common areas to complement Western's existing campus architecture and activate the streetscape. Common areas on upper floors, such as lounges and study rooms, are to be glazed to provide visual interest and visual surveillance ('eyes on the street'). The building is stepped back from Richmond Street and includes a terrace on top of the two storey dining area, as well as a green roof component (refer to **Figure 10**).

The eight storey portion of the building is setback a minimum of 13.2 m from the low-rise residential uses along Tower Lane. The existing trees along University Drive and to the north will be maintained and additional trees are planned to be planted to provide additional screening from the existing dwellings. The existing fence along the mutual property line to the north will be retained.

The proposed building is also to be setback 7.0 m from Elgin Hall and a minimum of 7.0 m from the current property line to accommodate a potential future road widening in accordance with the Master Development Agreement.

Figure 10 – Overhead View from Richmond Street, Looking Northwest

Image: architects Tillman Ruth Robinson



The building is targeted to achieve LEED Gold Certification.

Urban design considerations associated with the proposed development are evaluated within The Urban Design Brief prepared by architects Tillman Ruth Robinson (“aTRR”) in support of the Zoning By-law Amendment application, dated September 11, 2023.

Floor plans and elevations are provided in **Appendix A**.

3.1.2 Master Development Agreement

The subject lands are part of “Area 1” in the Master Development Agreement executed between the University of Western Ontario and the City of London, registered on title on dated February 11, 2022. All development of the campus, including the proposed development, are subject to the terms of the Master Development Agreement until August 2031. With regard to the proposed development, the Master Development Agreement addresses the following:

- Urban Design Principles, which are to include:
 - Activity generators in ground floors adjacent to public streets,
 - Pedestrian connections that mimic desire paths;
 - Locate parking at the rear of sites / screen parking from the public realm;

- Provide a hardscape plaza or forecourt between the public sidewalk and building in cases where buildings are required to be setback from public streets;
- Buildings are to provide maximum frontage along public streets with the principal building entrance facing the street;
- Large buildings are to have broken up massing;
- Buildings facing streets are to provide pedestrian-friendly and human-scale design features;
- Where fencing is necessary, the building is to be used as a portion of the required fencing;
- Parkland dedication is to be via temporary easements for the existing Thames Valley Parkway paths throughout campus, with no additional parkland dedication or cash-in-lieu of parkland required;
- A two zone flood approach is permitted within the Regulated Areas of the Upper Thames River Conservation Authority, with limited development permitted in the flood fringe. A Section 28 permit is required under the Conservation Authorities Act;
- Development is not permitted within 24 m from the centerline of this area of Richmond Street to account for future road widenings;
- A Master Servicing Study (2019) addresses servicing for the next 30 years and additional water, wastewater, and stormwater engineering drawings or servicing briefs are not required for development of the campus;
- A Heritage Impact Assessment is required prior to development in this area;
- A Stage 1 – 2 Archaeological Assessment is required prior to development;
- Bicycle parking is to be provided for each building in accordance with the Zoning By-law; and
- Tree preservation, landscaping, and lighting are to be provided in accordance with the agreement.

In our opinion, the proposed development has been designed in accordance with the direction set out in the Master Development Agreement.

3.2 Applications

This section provides an overview of the proposed Zoning By-law Amendment and future planning application(s) required to facilitate the proposed redevelopment.

3.2.1 Zoning By-law Amendment

A Zoning By-law Amendment is required to facilitate the proposed development. The proposed Amendment would replace the RF Zone applied to the affected portion of 1151 Richmond Street and the RF(7) Zone applied to 1163 Richmond Street with a new RF Special Provision (RF(_)) Zone applicable to the entirety of the subject lands. The proposed RF Zone exception integrates site-specific building setbacks that are intended to accommodate the scale and positioning of the planned residence.

The proposed ZBA is discussed in detail in Section 4.3 of this Report.

3.2.2 Site Plan Approval

The proposed development will be subject to Site Plan Approval prior to issuance of a building permit. A Pre-submission Consultation Meeting was held with City of London staff on November 16, 2023 to discuss the proposed site plan. As required in the complete application requirements for the ZBA application, a Record of Site Plan Consultation is included in this Report as **Appendix B**.

4.0 Planning Analysis

The proposed Zoning By-law Amendment application 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 London Plan.

4.1 Provincial Policy Statement

The Provincial Policy Statement (“PPS”) was issued under Section 3 of the Planning Act and came into effect on 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. Part IV of the PPS sets out that this policy instrument 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 development 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 and Healthy Communities) and Section 2.0 (Wise Use and Management of Resources) of the PPS are particularly relevant to this proposal. **Table 2** demonstrates how the proposed development is consistent with the identified policies.

Table 2 – Consistency with the Provincial Policy Statement

PPS Policy	Response
<p>1.1.1 Healthy, livable and safe communities are sustained by:</p> <ul style="list-style-type: none"> 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; 	<p>The development proposal promotes an efficient land use pattern that would support the long-term financial well-being of the Province of Ontario and the City of London by optimizing the use of existing and planned infrastructure. Additionally, it is anticipated that students accommodated by the proposed residence would contribute to service and retail uses in London. Economic benefits would also be derived from construction of the project.</p> <p>The subject lands are located within a mixed-use development area containing a variety of institutional, commercial, and residential uses, including a mix of low, medium, and high density residential forms. Implementation of this proposal would (1) provide a housing form compatible with the local development context and (2) further diversify the range and mix of housing options available for Western students.</p>

PPS Policy	Response
<p>c) avoiding development and land use patterns which may cause environmental or public health and safety concerns;</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>g) ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;</p>	<p>The proposed development should not result in environmental or public health and safety concerns.</p> <p>Preliminary servicing reviews have been completed to confirm that (1) the development can proceed in a cost-effective manner and (2) the necessary servicing infrastructure would be available to meet projected needs. Notably, MTE completed a Sanitary Servicing Analysis, dated December 19, 2023, which concludes that the City’s existing servicing infrastructure within the study area has sufficient capacity to accommodate the proposed development.</p> <p>It is anticipated that existing service facilities provided on campus would accommodate the needs of residents of this development.</p>
<p>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.</p> <p>Within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas.</p>	<p>This proposal would develop lands located within the City’s Urban Growth Boundary (UGB) designated for institutional purposes pursuant to The London Plan. As discussed in Section 4.2 of this Report, this proposal conforms to the use permissions of this Official Plan. The development would also help the City accommodate its forecasted population growth and achieve its projected housing requirements as set out in The London Plan and related policy documents.</p> <p>As discussed, the proposal would accommodate approximately 772 beds in 259 residential suites. The intended intensity of this proposed development would support the continued growth of Western and, more broadly, the City of London. Moreover, implementation of this proposal would diversify the range and mix of housing available within the UGB for Western students to help meet market demand. It is also anticipated that these additional on-campus units would broaden housing options for non-student households in near-campus neighbourhoods.</p>
<p>1.1.3.1 Settlement areas shall be the focus of growth and development.</p>	<p>The site is located within the City’s UGB and is therefore considered part of a settlement area, as defined by the PPS.</p>
<p>1.1.3.2 Land use patterns within settlement areas shall be based on densities and a mix of land uses which:</p>	<p>This proposal would help promote the efficient use of land and existing services by developing vacant lands on Western’s campus for a mid-rise student residence.</p>

PPS Policy	Response
<ul style="list-style-type: none"> 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; 	<p>As discussed, preliminary servicing reviews have been carried out to confirm that adequate servicing is available to accommodate the intended development.</p> <p>To help promote active transportation, the proposed development includes walkways that provide connectivity to on- and off-campus sidewalks and pathway systems.</p> <p>The Site is well serviced by public transit, with London Transit bus stops conveniently located along the University Drive and Richmond Street frontages of the subject lands. Through the bus transfer network, London Transit routes in the vicinity of the Site provide connectivity to Downtown London, designated employment areas, major public institutions, shopping centres and recreational facilities.</p>
<p>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:</p> <ul style="list-style-type: none"> b) permitting and facilitating: <ul style="list-style-type: none"> 2. 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 	<p>Development of a mid-rise residential student residence on the site would broaden the range and mix of multiple-unit housing available to Western students.</p> <p>Preliminary studies have been completed to confirm that servicing infrastructure is available to meet projected needs. Additionally, it is anticipated that existing public service facilities available on- and off-campus would accommodate the projected demands of this development.</p> <p>The development plan would utilize existing land and servicing resources in an efficient manner and would be supported by the road transportation system, the active transportation network, and transit services. The proposal also supports a compact land use pattern that is compatible with, and complementary to, the local development context.</p>

PPS Policy	Response
<p>facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;</p> <p>e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations; and</p> <p>f) establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety.</p>	
<p>1.5.1 Healthy, active communities should be promoted by:</p> <p>a) Planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate active transportation and community connectivity.</p>	<p>The proposed development would promote safety through glazed elements that overlook the public realm, providing eyes on the street, and through outdoor lighting. The lobby is to be staffed 24 hours a day by Western personnel as an additional security measure. The residence is also to be positioned outside of natural hazard areas.</p> <p>The subject lands are well connected to the surrounding active transportation network, including sidewalks on- and off campus. Bicycle parking is provided in accordance with the Zoning By-law, and transit passes are provided to students.</p> <p>Social interaction is fostered through common areas inside and outside of the building. Community connectivity is promoted through site location, building design, and landscaping.</p>
<p>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.</p>	<p>Preliminary servicing reviews have been carried out 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</p>

PPS Policy	Response
	can be accommodated by existing public service facilities.
<p>1.6.7.3 As part of a multimodal transportation system, connectivity within and among transportation systems and modes should be maintained and, where possible, improved including connections which cross jurisdictional standards.</p> <p>1.6.7.4 A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.</p>	<p>The subject lands are serviced by two existing London Transit bus service stops. The bus transfer system provides connectivity throughout the City and to regional transportation facilities (e.g., London International Airport, VIA Rail Station).</p> <p>The proximity of the site to campus amenities, service/retail commercial uses, Central London, and parkland would help future residents minimize to the length and frequency of vehicle trips. To further reduce car dependency, students attending Western are provided with a transit pass. As discussed, the subject lands are well served by existing bus transit.</p>
<p>1.7.1 Long-term economic prosperity should be supported by:</p> <ul style="list-style-type: none"> b) encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce; c) optimizing the long-term availability and use of land, resources, infrastructure and public service facilities; 	<p>The planned mid-rise residence would help to broaden the range and mix of housing options available to Western residents.</p> <p>Western is designated for institutional purposes, which includes permissions for student-oriented housing. Further, this project would have access to, and would help to optimize, the arterial road transportation network, transit services, municipal infrastructure and public service facilities.</p>
<p>1.8.1 Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and preparing for the impacts of a changing climate through land use and development patterns which:</p> <ul style="list-style-type: none"> a) promote compact form and a structure of nodes and corridors; b) promote the use of active transportation and transit in and between residential, employment (including commercial and industrial) and institutional uses and other areas; 	<p>The project supports a compact, multiple-unit residential form on lands designated for these purposes and situated with an institutional campus, fronting a Rapid Transit Boulevard and connected via public transit to Central London, commercial areas, and parkland.</p> <p>Development of this project would help to broaden housing choice for Western students and the intensity of this development would support existing transit services and future transit investments.</p>

PPS Policy	Response
e) encourage transit-supportive development and intensification to improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion;	
2.1.1 Natural features and areas shall be protected for the long-term.	The subject lands do not contain any designated natural areas. This property is located within the Regulated Area of the UTRCA and a permit will be required prior to development.
2.4.1 Minerals and petroleum resources shall be protected for long-term use.	The subject lands do not contain any known mineral or petroleum resources.
2.5.1 Mineral aggregate resources shall be protected for long-term use and, where provincial information is available, deposits of mineral aggregate resources shall be identified.	The subject lands do not contain any known mineral aggregate resources.
2.6.1 Significant built heritage resources and significant cultural heritage landscapes shall be conserved.	A Heritage Impact Assessment was completed by MHBC, dated February 2024, to evaluate the cultural heritage of the former Bank of Montreal building on 1163 Richmond Street. The Assessment determined that the BMO building does not meet the criteria for designation.
2.6.2 Development and site alteration shall not be permitted on lands containing archaeological resources or areas of archaeological potential unless significant archaeological resources have been conserved.	TMHC Inc. completed a Stage 1-2 Archaeological Assessment for these lands. TMHC concludes in the associated report, dated January 9, 2024, that no further archaeological assessment is recommended for the Site. The findings of this assessment have been registered with the Ministry of Heritage, Sport, Tourism and Culture Industries.

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

- Supports an efficient development pattern, as it proposes a compact residential form;
- Proposes a residential development plan that: has regard for the Official Plan’s vision for these lands; has consideration for the existing development context; promotes active and public transportation; and is in close proximity to the City’s arterial road network;

- Provides 772 purpose-built beds for students on campus, which broadens the range of housing choices available for Western students within the City and may provide additional housing options for non-student households in near-campus neighbourhoods;
- Promotes a scale of residential development that optimizes municipal investment in servicing infrastructure and public transit; and,
- Does not involve development on lands having known significant environmental, archaeological, mineral aggregate, or petroleum resources.

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 and the required Zoning By-law Amendment application is consistent with this policy document.**

4.2 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. Several policies and schedules of this Official Plan were appealed, and were subject to adjudication by the Ontario Land Tribunal and its predecessors (Case No. OLT-22-002286). The Tribunal, in its Decision issued May 25, 2022, resolved the final phase of the general policy appeals and ordered The London Plan to be fully in-force (excluding outstanding site-specific appeals).

4.2.2 Place Type and Policy Overview

Figure 11 of this Report illustrates that the Site is designated Institutional pursuant to the land use schedule of The London Plan (Map 1 - Place Types) and are within the Rapid Transit Boulevard on Map 3 (Street Classifications). Given this Official Plan designation and the scope of this project, in our opinion, the Our Strategy, Our City, City Building, Place Type Policies and Our Tools policies of The London Plan contain provisions applicable to the proposed development.

The following discussion (1) summarizes, in our opinion, the core policies of The London Plan relating to this proposal and (2) evaluates the merits of this project 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 as follows: “London 2035: Exciting, Exceptional, Connected”.

Policies 55 to 63 define eight key directions to help achieve this broad vision and to guide planning development to the year 2035 (being 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.
7. Plan for, and support, our institutions with strategic investments, strong communications and information technology infrastructure, support for the knowledge-based economy and opportunities for their growth and development.
11. Plan for cost-efficient growth patterns that use our financial resources wisely.

58_ Direction #4 Become one of the greenest cities in Canada

7. Practice and promote sustainable forms of development.
8. Promote green development standards such as LEED Neighbourhood Development and LEED Building Design and Construction standards.

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.
4. Plan for infill and intensification of various types and forms to take advantage of existing services and facilities and to reduce our need to grow outward.
5. Ensure a mix of housing types within our neighbourhoods so that they are complete and support aging in place.
6. Manage outward growth through the use of an Urban Growth Boundary and by supporting infill and intensification in meaningful ways.

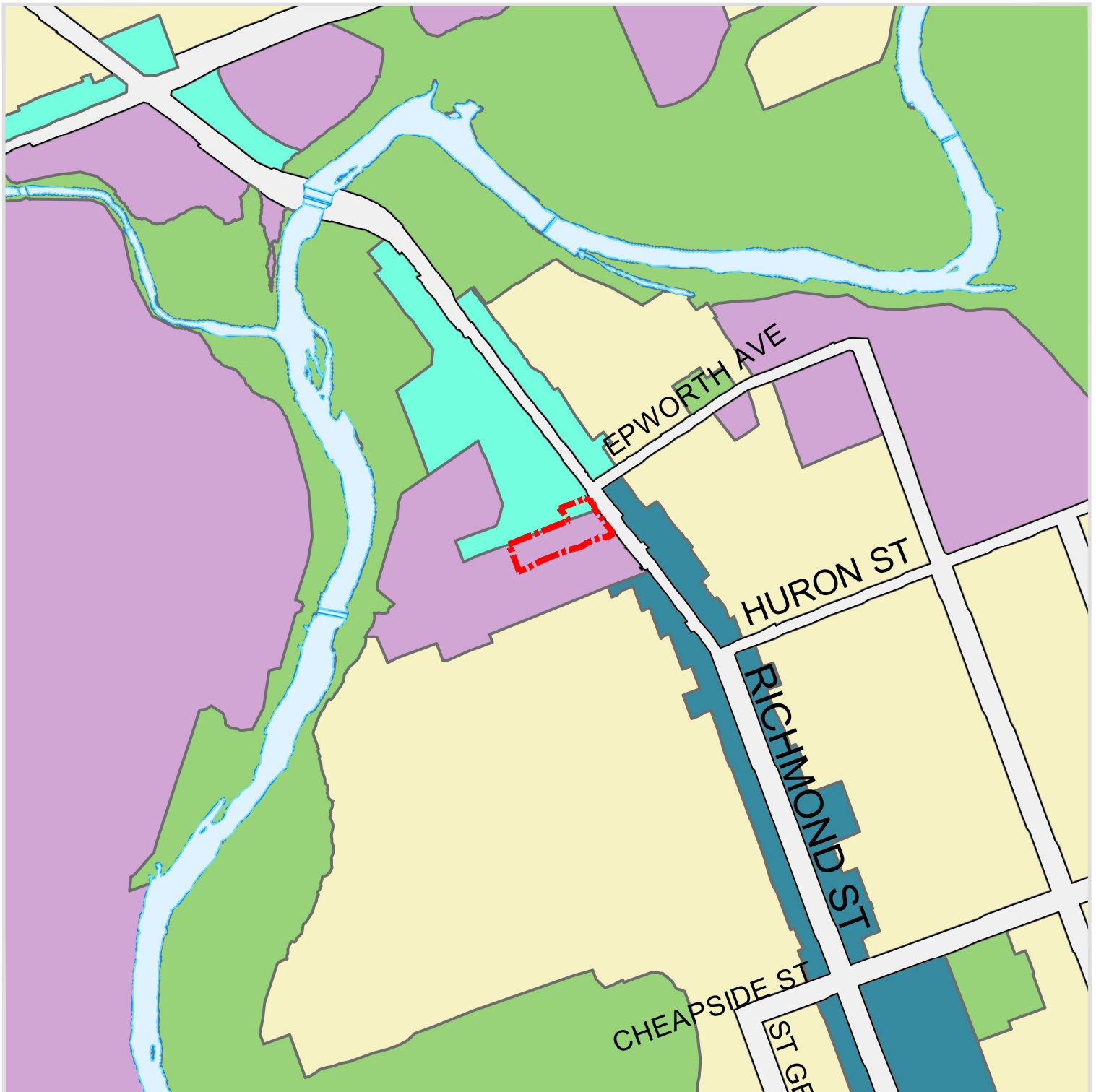






















Figure 11:
**The London Plan
 Official Plan Map 1 -
 Place Types**

1151 Richmond St
 1163 Richmond St
 City of London
 County of Middlesex

LEGEND

 Subject Lands

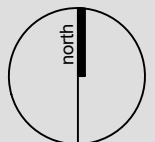
PLACE TYPES	
	Green Space
	Environmental Review
	Downtown
	Transit Village
	Rapid Transit Corridors
	Urban Corridors
	Shopping Area
	Main Street
	Neighbourhoods
	Institutional
	Heavy Industrial
	Light Industrial
	Commercial Industrial
	Future Community Growth
	Future Industrial Growth
	Farmland
	Rural Neighbourhoods
	Waste Management Resource Recovery Area
	Urban Growth Boundary

DATE: December 2023

SCALE: 1:10,000

FILE: 10175B

DRAWN: LC/PL



K:10175B - WESTERN UIRPT/LONDON PLAN MAP 1 PLACE TYPES_DEC2023.DWG

MHBC PLANNING
 URBAN DESIGN
 & LANDSCAPE
 ARCHITECTURE

200-540 BINGEMANS CENTRE DR. KITCHENER, ON, N2B 3X9
 P: 519.576.3650 F: 519.576.0121 | WWW.MHBCPLAN.COM

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 this development:

- Supports the continued growth of Western, a prominent institution and important economic generator in the City;
- Promotes a compact design that efficiently utilizes servicing infrastructure to accommodate projected needs and supports existing transit service;
- Integrates a compact growth pattern and proposes a mid-rise form and site layout designed to be compatible with adjacent residential and institutional development;
- Broadens housing choice for Western students by proposing a total of 772 beds in 259 residential suites;
- Contributes to a complete community by providing on-campus housing proximate to retail/service commercial uses and downtown London; and,
- Incorporates a land use pattern that is: in keeping with Provincial and City planning policies; appropriate for the subject lands; complements the local development setting, and should not generate adverse land use impacts.

Given these considerations, in our opinion, this proposal confirms to the Our Strategy policies defined within The London Plan.

4.2.4 Our City

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

As per Policy 69, 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 to 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. Within this policy structure, it is identified that the subject property is located within the City’s Urban Growth Boundary and Built-Area Boundary pursuant to Figures 1 and 2 of The London Plan, respectively, of the Growth Framework. Policies associated with the Growth Framework generally direct development and intensification to these areas. The subject lands are also situated within the City’s Primary Transit Area as delineated on Figure 3 of The London Plan, which is intended to be a focus of residential intensification with heightened pedestrian and cycling infrastructure in accordance with Policy 90.

Based on our assessment of City Structure Plan policies, in our opinion the development context associated with this proposal is in keeping with this Plan. It is also our opinion that the project has regard for the policies and/or schedules relating to the five frameworks. Most notably, the plan addresses the intensification and Primary Transit Area objectives of the Plan. In this regard, Policy 91 states that directing infill and intensification to the Primary Transit Area is a key component of the Official Plan’s strategy to manage growth in the City and to achieve the Plan’s target that 45% of all new residential development occur within the Built-Area Boundary. Further, Policy 92_3 sets out that it is an objective of the Plan that 75% of this intensification target will be in the Primary Transit Area.

The subject lands have frontage on Richmond Street, a Rapid Transit Corridor pursuant to Map 3 (Street Classification) of The London Plan. Policy 96 states, “Development along these corridors will be on an intensity that will support rapid transit ridership, without detracting from the highest intensity of development that is to be directed to the Downtown and Transit Village centres.”

Additionally, Our City policies detail the City’s strategy for growth servicing and financing (Policies 166 to 183). The principal objective of these policies is described in Policy 166, “The city’s structure could not operate successfully without sustainable, secure, reliable, and affordable infrastructure”. Further, Policy 168 states that municipal services will be planned on a long-term basis to support the City Structure Plan.

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

- Proposes a scale of development that aligns with the growth policies of the City Structure Plan, including the intensification objectives set out for the Primary Transit Area;
- Supports transit use within a Primary Transit Area and along a Rapid Transit Boulevard at a height and density that is appropriate for the subject lands and does not detract from Downtown; and,

- Preliminary servicing reviews have been completed to confirm that (1) the development can proceed in a cost-effective manner and (2) the necessary servicing infrastructure would be available to meet projected needs.

Given these considerations, in our opinion, this proposal conforms to the City Structure policies defined within The London Plan.

4.2.5 City Building

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. These policies are addressed in the accompanying Urban Design Brief, prepared by aTRR.

4.2.6 Institutional Place Type

As discussed, the site is located within the Institutional Place Type. Policies 1078 and 1079 describe that this designation applies to the largest educational facilities in the City, being Western and Fanshawe College, as well as large health care centres and the Western Fairgrounds, recognizing the substantial impact these uses have on London’s economy and social fabric.

Policy 1084_1 states that the vision for the Institutional Place Type is to plan with flexibility to allow for their change and evolution over time and to create the context for new mixes of uses that may be advantageous for institutions. Permitted uses are provided in Policy 1085 and include dormitories and residences accessory to institutional uses. Policy 1086_1 and Table 8 prescribe that the standard permitted height for buildings within this Place Type is between two (2) storeys (8 m) and 12 storeys, with an upper maximum height of 15 storeys.

The built form of development within this Place Type is set out in Policy 1087:

- “1. All planning and development applications will conform with the City Design policies of this Plan, any existing heritage conservation district plan, the Ontario Heritage Act and any other applicable guidelines.
2. Surface parking areas should be located in the rear and interior side yard. Underground parking and structured parking integrated within the building design is encouraged.
3. Public squares, urban parks and other social spaces should be incorporated into new development proposals and located in areas of high pedestrian activity, near transit stations or rapid transit corridors and at focal points within the district.
4. Transit stations on sites within the Institutional Place Type will be situated in prominent locations where there is a high level of pedestrian activity or where it can form a focal point for the site.
5. Robust tree planting will be encouraged on institutional lands, recognizing that such uses are often located on large lots and offer a significant opportunity to help achieve the canopy targets set in this Plan.

6. Cultural heritage resources will be conserved in conformity with the Cultural Heritage policies of this Plan and in accordance with the Ontario Heritage Act.”

It is our opinion that the proposed development is in keeping with the above-referenced policies, in light of the following considerations:

- A student residence is a permitted use;
- The proposed maximum height of 8 storeys is within the permitted height range;
- Surface parking is located at the rear of the building, accessed from Tower Lane;
- Social spaces are incorporated along both street frontages and help activate the pedestrian realm (**Figures 12 and 13**);
- The existing transit stations on Richmond Street and University Drive will be enhanced and are located near the primary entrance of the proposed building;
- Landscaping planned for the development would help the City achieve canopy cover targets set out in The London Plan; and,
- Cultural heritage resources have been assessed in accordance with The London Plan and in accordance with the Ontario Heritage Act.

Figure 12 – View of the Main Entry, Animating University Drive with a Large Social Area and Landscaping

Image: architects Tillman Ruth Robinson



Figure 13 – View of the Dining Area Animating Richmond Street, as Viewed From Tower Lane / Richmond St

Image: architects Tillman Ruth Robinson



Given these considerations, in our opinion, this proposal confirms to the Institutional Place Type policies defined within The London Plan.

4.2.7 Our Tools

The proposed use of the site from has been evaluated in the context of the Evaluation Criteria for Development Applications policies of the Our Tools part of The London Plan (Policies to 1577 to 1579). Policy 1578 states that all planning applications are subject to the following criteria:

1. Consistency with the Provincial Policy Statement and in accordance with all applicable legislation.
2. Conformity with the Our City, Our Strategy, City Building, and Environmental policies of this Plan.
3. Conformity with the policies of the place type in which they are located.
4. Consideration of applicable guideline documents that apply to the subject lands.

5. The availability of municipal services, in conformity with the Civic Infrastructure chapter of this Plan and the Growth Management/Growth Financing policies in the Our Tools part of this Plan.
6. Potential impacts on adjacent and nearby properties in the area and the degree to which such impacts can be managed and mitigated. Considering the type of application under review, and its context, an analysis of potential impacts on nearby properties may include such things as:
 - a) Traffic and access management.
 - b) Noise.
 - c) Parking on streets or adjacent properties.
 - d) Emissions generated by the use such as odour, dust, or other airborne emissions.
 - e) Lighting.
 - f) Garbage generated by the use.
 - g) Privacy.
 - h) Shadowing.
 - i) Visual impact.
 - j) Policy Deleted.
 - k) Trees and canopy cover.
 - l) Cultural heritage resources.
 - m) Natural heritage features and areas.
 - n) Natural resources.
 - o) Other relevant matters related to use and built form

The above list is not exhaustive.

7. The degree to which the proposal fits within its context. It must be clear that this is not intended to mean that a proposal must be the same as development in the surrounding context. Rather, it will need to be shown that the proposal is sensitive to, and compatible with, its context. It should be recognized that the context consists of existing development as well as the planning policy goals for the site and surrounding area. Considering the type of application under review, and its context, an analysis of fit may include such things as:
 - a. Policy goals and objectives for the place type.
 - b. Policy goals and objectives expressed in the City Design chapter of this Plan.
 - c. Neighbourhood character.
 - d. Streetscape character.
 - e. Street wall.
 - f. Height.
 - g. Density.
 - h. Massing.
 - i. Scale.
 - j. Placement of building.
 - k. Setback and step-back.
 - l. Relationship to adjacent buildings.

- m. Proposed architectural attributes such as windows, doors, and rooflines.
- n. Materials.
- o. Relationship to cultural heritage resources on the site and adjacent to it.
- p. Landscaping and trees.
- q. Coordination of access points and connections.
- r. Other relevant matters related to use, intensity and form.

The above list is not exhaustive.”

It is our opinion that the proposal demonstrates consistency with the PPS and conformity with the policy direction and provisions of The London Plan, including the use, form and intensity policies of the Institutional Place Type. Further, the intended design components of the mid-rise student residence and the associated site layout should not generate significant land use impacts, particularly in relation to shadows, traffic management, and parking, which have been assessed in technical reports. Impacts on cultural heritage resources have additionally been assessed.

The project represents an appropriate development for the subject lands and would effectively ‘fit’ with its community context, which includes existing student residences and private residential buildings ranging from low-rise to high-rise within 300 m of the subject lands. In this regard, as set out in this Report, the building design and site layout proposed for the subject lands is compatible with the local development setting and would contribute positively to Western’s campus and the surrounding public streetscape.

Given these considerations, in our opinion, this proposal conforms to the Our Tools policies defined within The London Plan.

4.2.8 Summary

In light of these considerations and commentary provided in this Report, **it is our opinion that the proposed development (1) supports the broad vision and guiding objectives of the Institutional Place Type and conforms to the land use permissions and broader policies of The London Plan.**

4.3 City of London Zoning By-law No. Z.-1

4.3.1 Existing Zoning

Figure 14 of this Report illustrates that 1151 Richmond Street is zoned Regional Facility (RF) and 1163 Richmond Street is zoned Regional Facility Special Provision (RF(7)) pursuant to Schedule “A” of the Zoning By-law. Section 31.1 of the Zoning By-law identifies that the RF Zone is intended to regulate large institutional type facilities which serve a regional function.

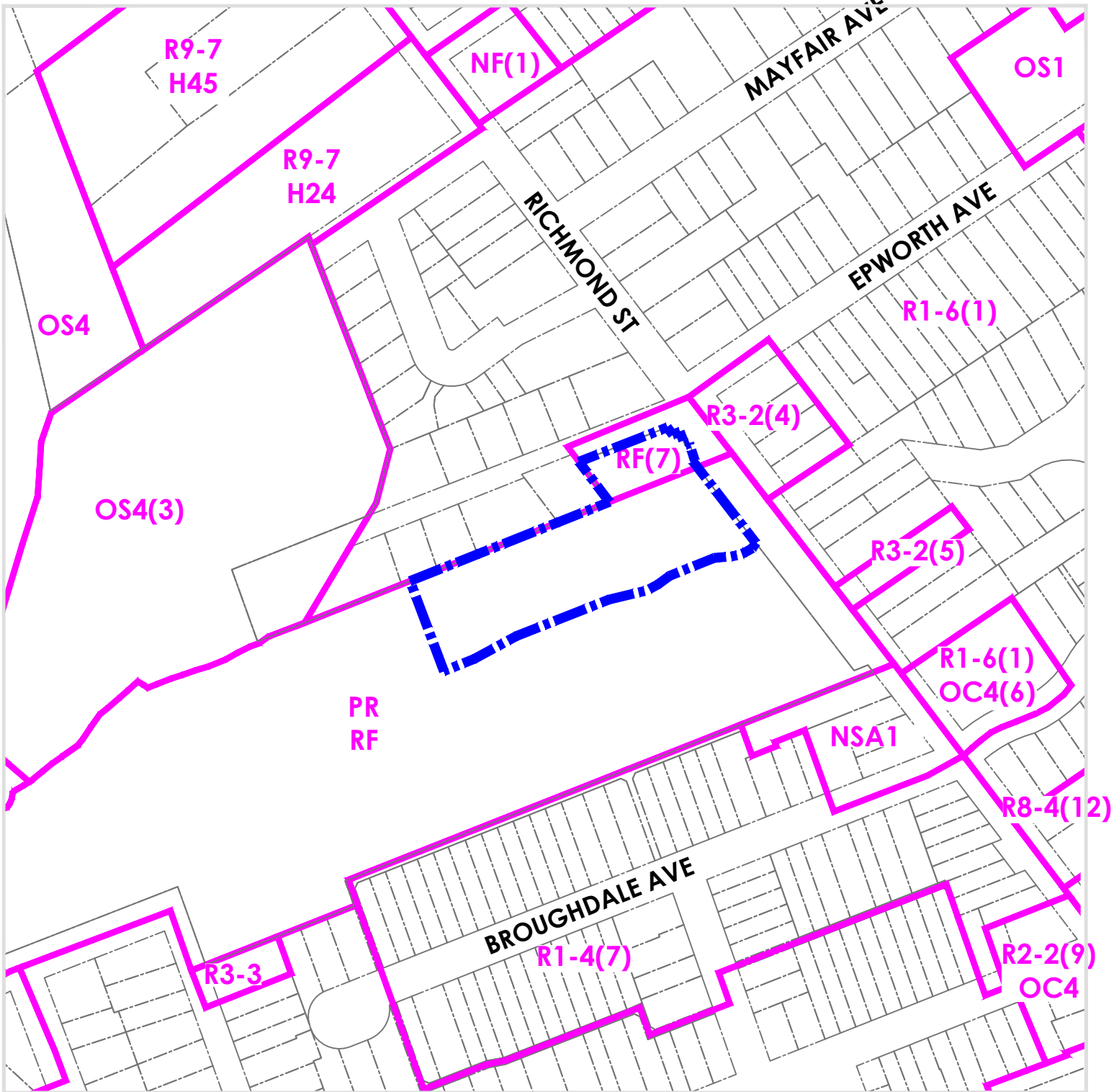


Figure 14:
City of London Zoning
By-law No. Z.-1

LEGEND

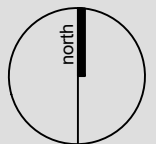
- Subject Lands
- Z.-1 Zones
- CC Convenience Commercial Zone
- CF Community Facility Zone
- NF Neighbourhood Facility Zone
- OS Open Space Zone
- RF Regional Facility Zone
- R1 Residential R1 Zone
- R2 Residential R2 Zone
- R3 Residential R3 Zone
- R8 Residential R8 Zone
- R9 Residential R9 Zone

DATE: December 2023

SCALE: 1:3,000

FILE: 10175B

DRAWN: LC/PL



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1151 Richmond St
 1163 Richmond St
 City of London
 County of Middlesex


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 ARCHITECTURE
200-540 BINGEMANS CENTRE DR. KITCHENER, ON, N2B 3X9
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Permitted uses in the RF Zone are set out in Section 31.2 of the Zoning By-law and include:

- | | |
|--|----------------------------|
| a) Adult secondary schools; | j) Group Home Type 2; |
| b) Ancillary residential and/or hostels and accommodations, together with permitted uses in this zone; | k) Hospitals; |
| c) Places of Worship; | l) Institutional uses; |
| d) Commercial parking structures and/or lots; | m) Libraries; |
| e) Commercial schools; | n) Nursing homes; |
| f) Community colleges; | o) Private schools; |
| g) Day care centres; | p) Recreational buildings; |
| h) Elementary schools; | q) Secondary schools; |
| i) Emergency care establishments; | r) Stadia; |
| | s) Supervised residences; |
| | t) Universities |

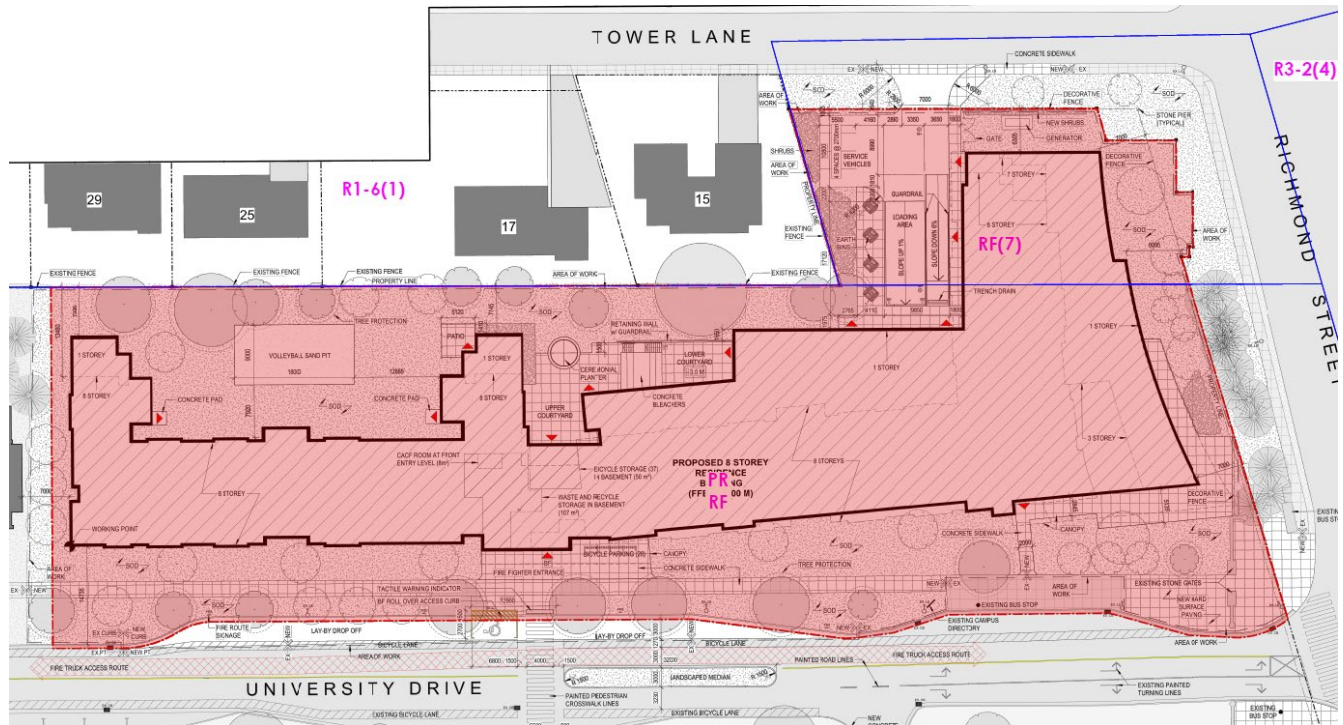
Section 31.4 prescribes that the RF(7) Zone permits University uses excluding residences, licenced drinking establishments, and restaurants. Additionally, the Special Provision establishes a maximum height of 8.0 m, a minimum landscaped open space of 30%, and that a maximum of 25% of the gross floor area of a building may be used for a retail store associated with a University use.

Table 3.0 compares the proposal to development regulations applying to the RF Zone, using the following yards and the development area shown in **Figure 15**:

- Richmond Street: frontage (to be defined as such in the Zoning By-law Amendment)
- Tower Lane: exterior side yard
- University Drive: interior side yard (private road)
- Elgin Hall: rear yard (for zoning area)
- Yard adjacent to 15, 17, 25, and 29 Tower Lane: interior side yard
- Yard adjacent to 15 Tower Lane (at the rear of the BMO building): interior side yard

Figure 15 – Proposed Zoning Area

Image: MHBC



4.3.2 Zoning Review

In light of the zoning analysis presented in Table 3, a site-specific RF Zone variation is proposed for the entire project site to accommodate the intended site layout and building design, and to allow for minor design modifications that may arise during project planning.

Table 3: Zoning Assessment of Proposal

Provision	Required: RF and RF(7) Zone	Proposed: (RF() Zone)	Compliance
Minimum Lot Frontage	50 m	106 m	Yes
Minimum Lot Area	4,000 m ²	14,289 m ²	Yes
Minimum Front and Exterior Side Yards	6 m plus 1 m per 3 m of main building height or fraction thereof above the first 3 m		

Provision	Required: RF and RF(7) Zone	Proposed: (RF() Zone)	Compliance
	Front (Richmond St), 1 - 3 storey elements = 8.26 m	Front (Richmond St), 1 - 3 storey elements = 7.0 m (before road widening) 0.0 m (after road widening)	No
	Front (Richmond St), 8 storey element = 13.4 m	Front (Richmond St), 8 storey element = 14.7 m (before road widening) 7.5 m after road widening	No
	Exterior (Tower Ln), 1 - 3 storey element = 8.26 m	Exterior (Tower Ln), 1 - 3 storey element = 6.4 m	No (Note: Measurement taken from building face to main exterior side yard)
	Exterior (Tower Ln), 7 - 8 storey element = 13.4 m	Exterior (Tower Ln), 7 - 8 storey element = 6.4 m	No (Note: Measurement taken from building face to main exterior side yard)
Minimum Side and Rear Yards	6 m plus 1.2 m for each 3 m of building height or fraction thereof above the first 3 m		
	Interior (University Dr) = 14.9 m	Interior (University Dr) = 9.5 m	No
	Interior (15 Tower Ln, from rear of BMO building) = 14.9 m	Interior (15 Tower Ln, from rear of BMO building) = 18.5 m	Yes

Provision	Required: RF and RF(7) Zone	Proposed: (RF() Zone)	Compliance
	Interior (Residential lots on Tower Ln), 1 storey element = 6.8 m	Interior (Residential lots on Tower Ln), 1 storey element = 7.4 m	Yes
	Interior (Residential lots on Tower Ln), 8 storey element = 14.9 m	Interior (Residential lots on Tower Ln), 8 storey element = 13.4 m	No
	Rear (Elgin Hall) = 14.9 m	Rear (Elgin Hall) = 3.5 m	No
Minimum Landscaped Open Space	15% 30% (RF(7))	50%	Yes
Maximum Lot Coverage	30%	27%	Yes
Maximum Height	40.0 m 8.0 m (RF(7))	26.8 m	Yes (RF) No (RF(7))
Bicycle Parking Spaces (Tier 2 = School Use) GFA = 28,300 sq. m	0.2 spaces / 100 sq. m of GFA plus 3 spaces = 60	65	Yes

This information is additionally included in the Zoning Data Sheet, included as **Appendix C**.

In accordance with the terms of the Master Development Agreement, vehicular parking for Western is provided campus-wide and is not required for individual buildings. Bicycle parking is required for each building under the Agreement.

4.3.2 Proposed Zoning

The proposed site-specific RF() Zone exception would incorporate the following RF Zone exceptions to accommodate the intended building design and site layout:

- For zoning purposes, Richmond Street is the frontage;
- A reduction in the front yard setback:
 - For 1 – 3 storey elements: from 8.26 m to 7.0 m before road widening and 0.0 m after road widening;
 - For 4 storeys and above: from 13.4 m to 14.7 metres before road widening and 7.5 m after road widening;
- A reduction in the exterior side yard setback:
 - For 1 - 3 storey elements: from 8.26 m to 6.4 m;
 - For 4 storeys and above: from 13.4 m to 6.4 m;
- A reduction in the interior side yard setback:

- University Drive: from 14.9 m to 9.5 m;
- Residential lots fronting onto Tower Lane, 4 storeys and above: from 14.9 m to 13.4 m;
- A reduction in the rear yard setback:
 - From 14.9 m to 3.5 m.

Discussion and justification for the requested Amendment and site-specific exceptions are provided below.

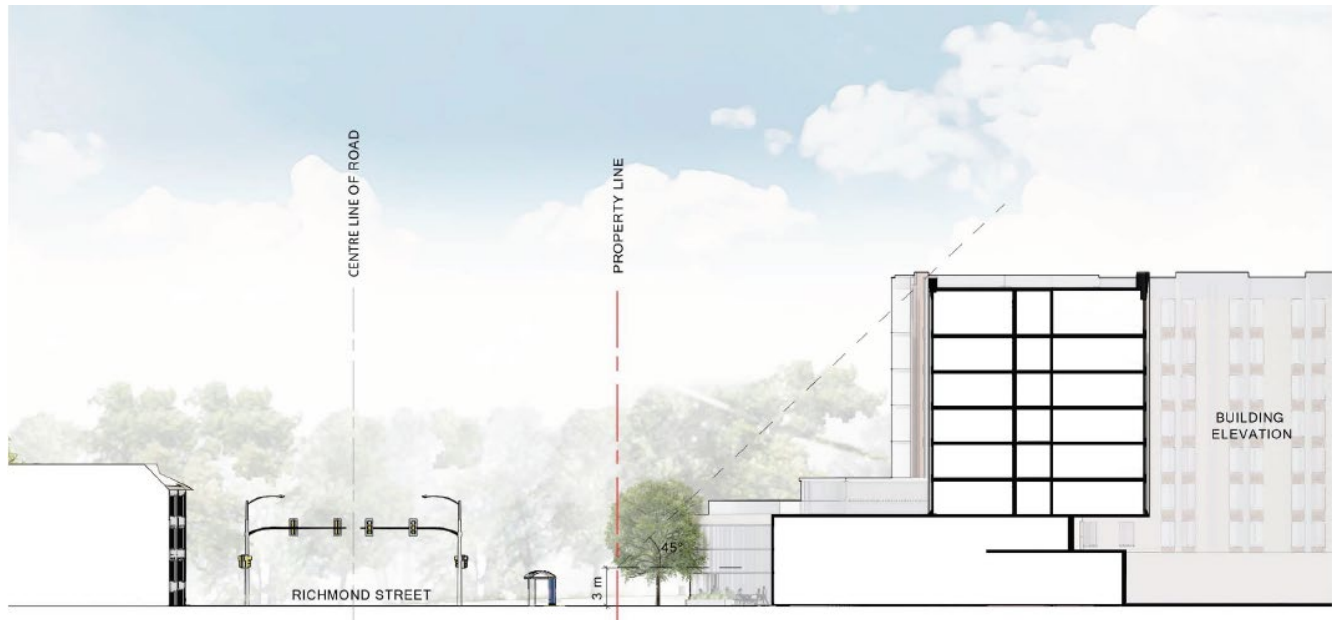
Removal of RF Zone Special Provision (1163 Richmond Street)

The effect of removing the RF(7) Zone applied to 1163 Richmond Street would be the lifting of Special Provisions respecting: the restriction on permitted use; the maximum height of 8.0 metres; the minimum landscaped open space provision (30%), and the restriction on percentage of floor area occupied by a retail use. In our opinion, these site-specific zoning regulations are intended to address the compatibility of development at this interface between Western and the surrounding residential neighbourhood. It is also our opinion that the proposed amendment to this Zone is appropriate in the context of this project, as the proposed development adequately considers compatibility elements of the RF(7) Zone with the adjacent neighbourhood in the following ways:

- The height reduces to one storey along Richmond Street and a portion of Tower Lane as shown in **Figure 16**, creating a pedestrian-oriented streetscape that reflects the intent of the 8.0 metre height restriction in this area;
- The proposed development provides 50% open space, well above the 30% requirement stipulated in the Special Provision;
- A retail use, which may generate additional parking demands from visitors and employees, is not proposed; and,
- A university residence is an appropriate use that is compatible with the surrounding residential neighbourhood, including mid- and high-rise residential buildings proximate to the subject lands.

Figure 16 – East-West Cross Section, Looking South

Image: architects Tillman Ruth Robinson



Richmond Street as the Defined Front Yard

The Amendment proposes to establish Richmond Street as the front yard for zoning purposes, where the Zoning By-law directs that Tower Lane would be the zoning frontage (as the shortest street frontage). This request is made to simplify the application of zoning regulations to the site and to acknowledge that Richmond Street functions as the main public street frontage for subject lands.

Reduction in Front Yard Setback

A reduction in the front yard setback is requested to facilitate the proposed development. The proposed Amendment distinguishes between setbacks for the one (1) to three (3) storey building elements and the elements that are four (4) storeys and above to require that the development steps down towards Richmond Street. The Amendment additionally includes the provision of a 0.0 m setback from Richmond Street to account for the required road widening and to provide flexibility for any design changes that may occur post-widening as the University adapts to changes over the life of the building.

In our opinion, the intent of a minimum front yard setback is to ensure that appropriate distance is provided between the public realm and the building face (1) to create an attractive pedestrian realm where the building massing does not impose on the streetscape and (2) to provide an opportunity for landscaping along streetscapes.

In this case, it is also our opinion that these objectives are met with a minimal setback. Firstly, the building steps down to one storey along Richmond Street and features a dining area with glazing along Richmond Street, creating a pedestrian-oriented frontage along Richmond Street that benefits from proximity to the public realm (**Figure 17**). In this respect, with the requested 0.0 m setback, the building

will be adjacent to the City sidewalk. Secondly, it is our understanding that road widening will be taken to support future transit improvements along Richmond Street. In that case, it is anticipated that Richmond Street will further urbanize to have a built form more typical of downtown London, where reduced setbacks are common. Taking these matters into consideration, in our opinion, the front yard setback can be reduced with minimal land use impacts.

Figure 17 – Richmond Street Elevation

Image: architects Tillman Ruth Robinson



Reduction in Exterior Side Yard Setback

The subject lands have an exterior side yard facing Tower Lane. A reduced minimum setback is requested to accommodate the proposed development, with all building elements being setback at least 6.0 metres from the exterior side yard.

In our opinion, the intent of the minimum exterior side yard setback is to provide adequate space for corner lots for adequate vehicular sight lines and for aesthetic purposes. It is our opinion that both of these objectives are achieved with the proposed reduction, given the matters noted below:

- The proposed exterior side yard setback is greater than the existing setback of the former Bank of Montreal building, providing increased sight lines for turning vehicles and providing additional space for landscaping;
- The two existing accesses from Tower Lane will be consolidated into one entrance, increasing pedestrian safety over current conditions;
- The increased height of the planned development over the existing building is mitigated by the step down proposed along Tower Lane;
- The podium area occupies approximately half of the building frontage along Tower Lane, and the higher element also steps from eight to seven storeys, as shown in **Figure 13**; and
- Landscaping and fencing will be used to soften the transition along Tower Lane.

Reduction in Interior Side Yard Setback

The development area has three interior side yards – one along University Drive, which is a private road, and two along the property lines of the existing dwellings that front onto Tower Lane (one at the north and one behind the BMO building). The interior yard setbacks along University Drive and the dwellings along Tower Lane require a reduction to accommodate the proposed development.

In our opinion, the intent of an interior side yard setback is to provide space between buildings for landscaping / aesthetics, fire separation, and privacy.

With regard to the University Drive setback, which functions as the main entrance from campus and the frontage for residents and staff of the building, the provided setback is appropriate. The building is oriented towards the street, providing eyes on the street and animating the street frontage. In our opinion, the provided setback (9.5 m) provides ample room for landscaping while providing convenient and accessible access for users.

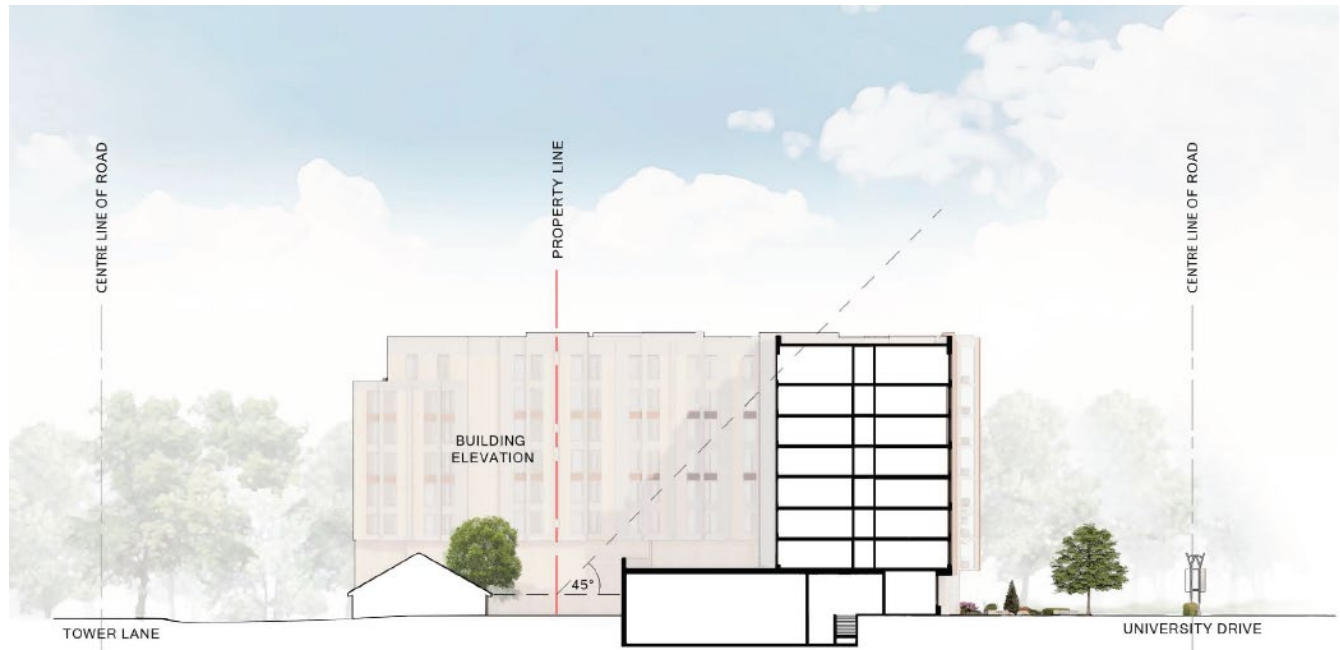
The interface between the existing low-rise residential buildings along Tower Lane and the proposed development have been carefully considered in the design, with privacy, shadowing, and building massing designed to reduce impacts on the existing dwellings as follows and as shown in **Figure 18**:

- The proposed setback is similar to the existing setback established by Elgin Hall;
- Existing fences and mature trees along the mutual property line are to be retained, and additional trees are proposed to augment this visual buffer;
- Similar to the Richmond Street frontage, the building is proposed to reduce to one storey along the side yard interface to reduce visual impacts and privacy concerns; Outdoor amenity areas are proposed between the building and the side property line, creating a well-maintained and occupied area that increases safety and reduces nuisances associated with unoccupied areas; and,
- Shadows have been assessed in the Urban Design Brief, with impacts on the rear yards of the adjacent low-rise dwellings being minimal from noon onward during the outdoor seasons (spring, summer, and autumn).

In light of these considerations, it is our opinion that the proposed reduction in the interior side yard setback from Tower Lane is also appropriate.

Figure 18 – North-South Cross Section, Looking East

Image: architects Tillman Ruth Robinson



Reduction in Rear Yard Setback

As Richmond Street is proposed to be the frontage for zoning purposes and the site is to be zoned separately from the RF Zone applied to the balance of the Western campus, the defined rear yard is the yard abutting Elgin Hall (an existing five storey student residence located immediately west of the site). Elgin Hall is shown in **Figure 19**, as viewed from the existing volleyball court on the subject lands. For zoning purposes the 7.0 m distance between Elgin Hall and the planned residence is proposed to be split (3.5 m and 3.5 m) to create the zoning area for site-specific RF() Zone.

In our opinion, the purpose of a rear yard setback is to ensure that adequate distance is provided for outdoor amenity space, privacy, and servicing (if required). In this respect, Western is an urban campus where walkability and safety are prioritized. Existing campus buildings, including residences, are constructed proximate to one another to achieve these goals. This is evidenced by the positioning of existing residences on the south side of University Drive and throughout campus, as shown in **Figure 20** where Medway Hall and Sydenham Hall have a small area between the buildings. The reduced area between buildings allows for adequate lighting, limits areas that are unprogrammed, and decreases walking distance for students and faculty.

It is our opinion that the aforementioned objectives and development pattern have been considered in relation to the proposed reduction of the rear yard setback.

Figure 19 – View of Elgin Hall from Subject Lands

Image: MHBC (October 23, 2023)



Figure 20 – Elgin Hall, Viewed from the South Between Sydenham Hall (left) and Medway Hall (right)

Image: MHBC (October 23, 2023)



Zoning Amendment Request Summary

As discussed above, it is our opinion that the requested RF() Zone and associated Special Provisions are appropriate to implement the planned development and represent good planning.

5.0 Technical Reports

5.1 Stage 1 – 2 Archaeological Assessment

A Stage 1 -2 Archaeological Assessment was prepared by TMHC Inc. (dated January 9, 2024) to determine if the subject lands contain archaeological resources.

The Stage 1 Assessment involved a desktop review of the current land use, historic land use, past settlement history, and a consideration of the topographic and physiological features of the site. It also included a review of previously registered archaeological resources within a kilometre of the lands. The Stage 1 Assessment determined that the subject lands had potential for recovery of archaeological features based on a registered archaeological site, proximity to the North Thames River, previous use (Richmond Street and Huron Street, a 19th century grist mill), and listed heritage properties.

The Stage 2 Assessment included standard test pit surveys as the lands were non-ploughable. Obviously disturbed soils were immediately encountered, and a test pit survey was conducted at 10 metre intervals (87.8% of site area, with the remaining area consisting of built features). No archaeological resources were discovered during the Stage 2 Assessment, and no further assessment was recommended.

5.2 Heritage Impact Assessment

MHBC prepared a Heritage Impact Assessment to assess the heritage value of the subject lands and nearby features. 1151 and 1163 Richmond Street are identified on the City of London's Register of Cultural Heritage Resources (2019) as containing "listed" (non-designated) properties. Additionally, the subject lands are adjacent to several "listed" properties.

The City of London requested a scoped review of 1137, 1140, 1142, 1144, 1148, 1150, 1156, 1158, and 1160 Richmond Street. In accordance with the Master Development Agreement, Medwall Hall and the University Gates (east), both identified built heritage features located within 50 metres of the subject lands, were additionally assessed.

The Assessment determined that 1142, 1144, 1148, 1150, 1156, and 1160 Richmond Street have cultural heritage value or interest ("CHVI"). The properties located at 1163 Richmond Street (the former Bank of Montreal building, constructed in 1964) and 1137, 1140, and 1158 Richmond Street do not have potential to meet at least two of the prescribed criteria under O. Reg 9/06 and therefore are not considered cultural heritage resources and subsequently not included in the impact analysis.

The Assessment determined that adverse impacts are limited to potential impacts of alteration and land disturbances as it relates to the University Gates (east) and the landscaping associated with the proposed redevelopment. There are no adverse impacts identified for Medway Hall (1151 Richmond Street) or for adjacent aforementioned properties determined to be of CHVI.

The following mitigative measures are recommended to eliminate or limit potential negative impacts as it relates to the University Gates:

1. “Ensure that hardscaping and other related landscape works be of a material and location that is compatible with the existing masonry of the University Gates;
2. Protective measures (i.e. hoarding or tarping) should be implemented around the masonry monuments to reduce/ eliminate potential damage to the structures;
3. The guidelines for masonry in Section 4.5.3 within the Standards and Guidelines for the Conservation of Historic Places (“S&Gs”) be applied, where necessary. In particular:
 - a. Ensure proper documentation of the University Gates East is completed prior to works (i.e. architectural drawings, digital scanning) and identifying characteristics of the source of the type of stone use and composition of mortar;
 - b. Protect and maintain masonry by preventing water penetration, and maintaining property drainage so that water or organic matter does not stand on flat surfaces, or accumulate in decorative figures by making appropriate repairs;
 - c. Cleaning masonry to remove heavy soiling where needed using gentle cleaning methods and carrying out masonry cleaning tests prior to the use;
 - d. Repairing masonry by repointing the mortar joints where there is evidence of deterioration and using mortars that ensure the long-term preservation of the masonry by duplicating original mortar joints in colour, texture, width and joint profile.”

Similar conservation work is recommended for Medway Hall areas where there is discolouration and minor deterioration of masonry and associated mortar and that works be completed in consistency with Section 4.5.3 of the S&Gs as recommended similarly above for the masonry university gates.

5.3 Stormwater Management Report

A Stormwater Management Report was prepared by MTE (dated December 19, 2023) to assess stormwater management requirements of the City and propose a stormwater management design for the proposed development.

The Report relies on a Geotechnical Investigation (also prepared by MTE, dated August 31, 2023), which revealed that the subject lands are generally underlain by native granular deposits, silt and sand layers, and glacial till. One monitoring well was installed to collect groundwater samples and measure groundwater elevation. It was observed that the groundwater elevation is 238.6 masl.

The subject lands are currently in one catchment area draining towards Tower Lane. The post-development condition divides the land into four catchment areas, being the roof, the controlled area, the uncontrolled area draining onto University Drive, and the uncontrolled area draining to Tower Lane. Runoff from the roof will be directed to an underground storage tank, while runoff from the controlled area will be conveyed to catchbasins which will be directed to the proposed underground storage tank. Flow from the tank will be controlled with an overflow that connects to the proposed storm sewer network downstream of the orifice plate. No surface ponding is proposed.

The proposed development will improve the stormwater management of the subject lands, with events up to and including the 100-year storm event redirected away from the northern residential dwellings

along Tower Lane. No on-site quality controls are proposed. Erosion and sediment control fencing will be installed, and a mud mat will be installed at the primary construction entrance.

The Report concludes that:

- i. “the proposed stormwater management design provides adequate attenuation of the 2- and 100-year storm events when considering pre-development conditions as well as capacity of receiving storm infrastructure;
- ii. the proposed stormwater management design satisfies the water quality control requirement; and,
- iii. upon completion of construction, the site will conform to the design criteria specified by the City of London.”

And recommends that:

- i. “the site grading be undertaken according to the proposed elevations, details and erosion control measures shown on the enclosed engineering drawings;
- ii. the stormwater management facilities be installed as detailed on the enclosed engineering drawings; and
- iii. the stormwater management facilities be inspected by MTE Consultants Inc. during construction and certified to the City of London upon completion.”

5.4 Sanitary Capacity Analysis

A Sanitary Capacity Analysis (December 19, 2023) was prepared by MTE to assess sanitary services for the proposed development. Effluent from the proposed development will be directed to the 250mm diameter municipal sewer on the west side of Richmond Street. The anticipated additional peak flow rate is approximately 9.1L/s.

5.5 Parking Impact Assessment

In lieu of a Transportation Impact Study, which was waived by City of London staff following the Pre-Submission Consultation Meeting, Western prepared a Parking Impact Assessment (dated February 2, 2024) detailing parking demand for student residences on campus and parking supply on campus. The letter explains that only 3.6% of students in residence apply for parking permits, which would equate to a demand of 11 spaces for the proposed development. Adequate parking is available on campus to accommodate the additional parking demand, and staff and additional parking will be considered as part of the ongoing campus-wide parking study.

5.6 Arborist Report and Tree Preservation Plan

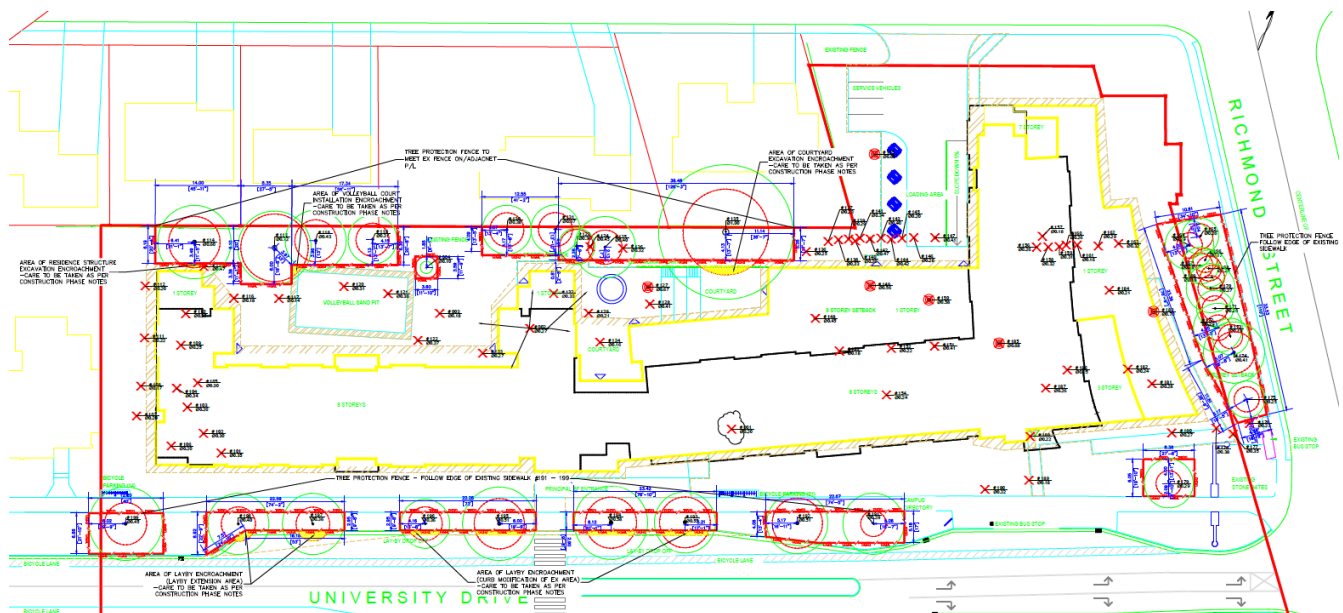
An Arborist Report (dated October 12, 2023) was prepared by GLN Farm & Forest to assess the impact of the proposed development on existing trees within and adjacent to the development area. The Report identifies:

- The subject lands are not within or immediately adjacent to a Tree Protection Area as described by the City of London Tree Protection By-law;
- There are 103 trees within the subject lands, of which 13 are “Distinctive Trees” (50cm DBH and larger on private land) that require tree replacement and 14 are located on public land. Of these trees:
 - Distinctive Trees:
 - 6 to be removed;
 - 6 to be injured;
 - 1 to be fully protected and outside of the construction proposed;
 - Public Trees:
 - 1 to be removed (due to construction impact);
 - 1 to be removed (due to condition);
 - 12 to be fully protected and located outside of the construction envelope
- There are 76 non-regulated private trees

The Tree Protection Plan is shown in **Figure 21**.

Figure 21 – Tree Protection Plan

Image: GLN Farm & Forest



5.7 Urban Design Brief

aTRR prepared an Urban Design Brief (dated September 11, 2023) to assess the built form of the proposed structure development in accordance with The London Plan. The Brief identifies the design goals and objectives for the proposed development:

- An improved streetscape along University Drive and Richmond Street;
- Campus cohesion;
- An improved gateway to University Drive;

- Improved safety and accessibility; and,
- Supporting student housing.

The Brief provides a detailed design response for the building, site, and public realm, and additionally provides sustainability measures that will be utilized.

A shadow study (**Figure 22**) is included in the Brief and identifies that shadow impacts on the residential dwellings fronting onto Tower Lane will be minimal in the spring and summer, with shadow impacts limited to the rear yards of the dwellings on spring mornings. In the autumn and winter the shadow impacts are increased, with rear yards shadowed until autumn afternoons and entirely shadowed during the winter.

Figure 22 – Shadow Impacts from Proposed Development

Image: Architects Tillman Ruth Robinson



6.0 Consultation

6.1 Public Consultation

The Planning Act (specifically O. Reg 544/06, amended by O. Reg. 178/16) requires that applicants submit a proposed strategy for consulting with the public with respect to an application as part of the complete application requirements. In addition, the City of London identified a Community Information Meeting as a requirement of a complete application. This section summarizes the proposed Public Consultation Strategy.

Western hosted a Community Information Meeting detailing the proposed development on June 26, 2023. Invitations were provided to the neighbourhood associations of St. George-Grosvenor, Broughdale, Orchard Park, and Sherwood Forest, as well as additional local residents who have interest in Western initiatives in the area. The presentation from this meeting is included as **Appendix D**. City staff have confirmed that this meeting satisfies the requirement for a Community Information Meeting.

The remainder of the public consultation process for the proposed Zoning By-law Amendment is anticipated to follow the Planning Act statutory requirements. The following points of public consultation are proposed:

1. A Notice of Application setting out the intent of the proposed ZBA will be circulated to local property owners and placed on the City’s corporate website for consideration and requesting comment. The Notice will also identify that a future Planning and Environment Committee (“PEC”) will be held respecting the application;
2. A PEC meeting at which time all available information including the City Staff Report will be available and public input will be received; and
3. A Council Meeting, at which time the City Staff Report, the PEC recommendation, all available information, and public input will be considered in Council’s final decision. A Notice of Council Decision will subsequently be issued to interested parties.

The consultation strategy proposed will provide members of the public with opportunities to review understand and comment on the proposed Zoning By-law Amendment application. The consultation strategy will be coordinated with City Staff and additional opportunities for consultation will be considered and may be warranted based on the input received.

7.0 Conclusion

The purpose of this Planning Justification Report is to evaluate the proposed Zoning By-law Amendment required to facilitate the redevelopment of the subject lands. This report has assessed the proposed application in the context of existing land use policies and regulations, including the Provincial Policy Statement, the City of London Official Plan, and the City of London Zoning By-law. The analysis contained in this report demonstrates that the proposed Zoning By-law Amendment is in the public interest and represents good planning for the following reasons:

- The application supports the development of lands located within the City's Urban Growth Boundary and Institutional designations pursuant to The London Plan;
- The site is well suited for the proposed development, given its physical dimensions and its location within a largely residential area of Western that has convenient access to public transit, active transportation opportunities, commercial services and campus amenities;
- The introduction of an additional 259 residential units within the campus setting: responds to demand for student housing; helps to address housing needs within the City at large; and supports the continued growth and development of Western as a major educational institution;
- Design components integrated into the proposal would contribute positively to the local streetscape and are intended to be compatible with, and complementary to, the surrounding neighbourhood;
- The Bank of Montreal Building, which is a listed heritage property, does not meet the required criteria for designation;
- Preliminary assessments indicate that adequate road and servicing infrastructure is available to accommodate the proposed development;
- The planned residence has been designed in accordance with the terms of the Master Development Agreement between Western and the City of London;
- The requested Special Provision supports the design objectives of The London Plan and aligns with the intent of the applicable Zoning By-law regulations; and,
- In our opinion, this proposed development consistent with the Provincial Policy Statement and conforms to the policy direction and permissions of the Official Plan.

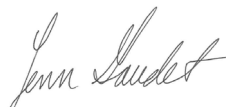
Based on these conclusions, it is our opinion that the application for Zoning By-law Amendment is appropriate and should be considered for approval.

Respectfully submitted,

MHBC



Scott Allen, MA, RPP
Partner



Jennifer Gaudet, BES, MCIP, RPP
Associate

