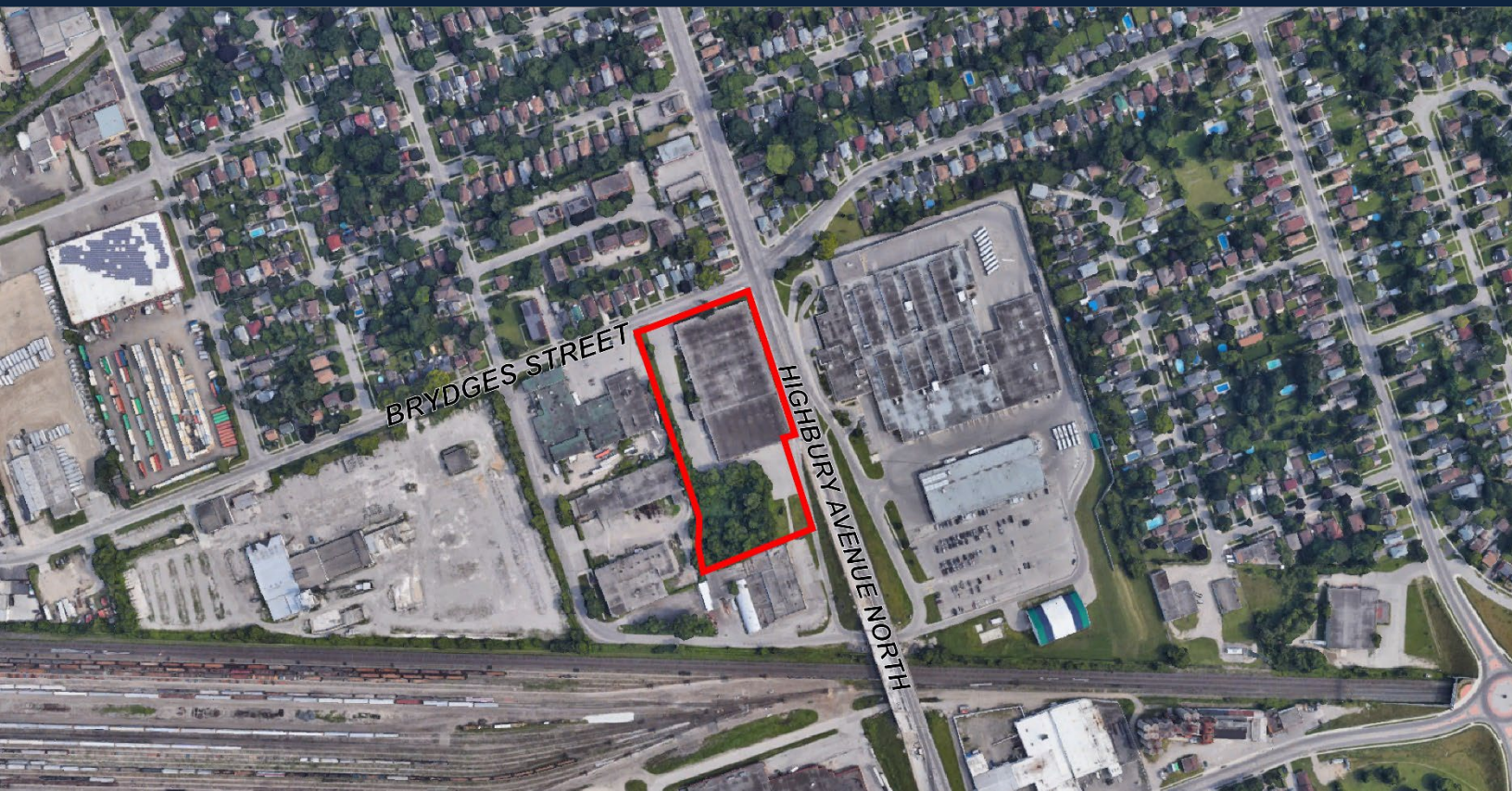


# Planning Justification Report

**Highbury Self-Storage Equities Ltd.**

**455 Highbury Avenue North**

**City of London**



**April 18, 2024**



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## 1.0 INTRODUCTION

Zelinka Priamo Ltd., on behalf of Highbury Self-Storage Equities Ltd., is pleased to submit this report in support of Official Plan Amendment and Zoning By-law Amendment applications to the City of London to permit the redevelopment of the southerly portion of the lands known municipally as 455 Highbury Avenue North (hereinafter referred to as the “subject lands”) for an expansion of the existing self-storage establishment use on the subject lands.

The purpose of this Planning Justification Report is to provide design details and evaluate the proposed Official Plan Amendment and Zoning By-law Amendment within the context of existing land use policies and regulations, including the 2020 Provincial Policy Statement, The London Plan (the City of London Official Plan), and the City of London Zoning By-law Z.-1.

## 2.0 SUBJECT LANDS

The subject lands are located at the southwest corner of the Highbury Avenue North and Brydges Street intersection (see Figure 1). The irregularly-shaped lands have an area of approximately 1.97ha; a lot frontage of approximately 195.0m along Highbury Avenue North; and, a lot depth of approximately 96.0m along Brydges Street.

Figure 1 – Subject Lands



The subject lands abut a number of commercial and industrial uses to the west and south, including auto parts suppliers, powder coating businesses, and warehouses. A storage depot containing a number of shipping containers arranged in rows is located further west. The CN railway corridor and stock yard is located further south, on the south side of Oakland Avenue. The London Transit Commission bus depot is located adjacent to the east of the subject lands, on the east side of Highbury Avenue North. A range of residential uses, including single detached dwellings, converted dwellings, and low-rise apartment buildings are located to the north, across Brydges Street.

The subject lands are currently occupied by a large, single-storey self-storage building with an area of approximately 7,000m<sup>2</sup>, and hard-surface parking and maneuvering area. It is understood that the building formerly contained a manufacturing facility for sports equipment (now vacated). The building is located proximate to the front and exterior lot lines, abutting Highbury Avenue North and Brydges Street, respectively. A full-turn vehicular driveway is available on Brydges Street. Surface parking areas are located to the west of the building for passenger vehicles, and an additional, larger parking area is located to the south of the building. The City of London issued a Tree Removal Permit in May, 2023 which permitted the removal of all trees within the Tree Protection Area, with the exception of several trees identified at the time for preservation, and with conditions for replacement tree plantings. See Figures 2-5 of the subject lands. Pedestrian sidewalks are present adjacent to the subject lands on both Highbury Avenue North and Brydges Street, providing connections to surrounding areas.

The subject lands are identified as within the “*Light Industrial*” Place Type along an “*Urban Thoroughfare*” Street Classification in The London Plan; and, are zoned “*Light Industrial (LI1(22))*” in the City of London Zoning By-law.

**Figure 2 – Subject Lands, looking north towards Brydges Street**



**Figure 3 – Subject Lands, looking east towards Highbury Avenue North**



**Figure 4 – Subject Lands, looking southeast**



**Figure 5 – Subject Lands, looking south**



### 3.0 SURROUNDING LAND USE CONTEXT

The subject lands are generally surrounded by commercial, industrial, and residential uses. The land uses within a 400m and 800m radii of the subject lands, representing an approximate 5-minute and 10-minute walking distance respectively, are shown in Figure 6.

Figure 6 – Surrounding Land Use Context



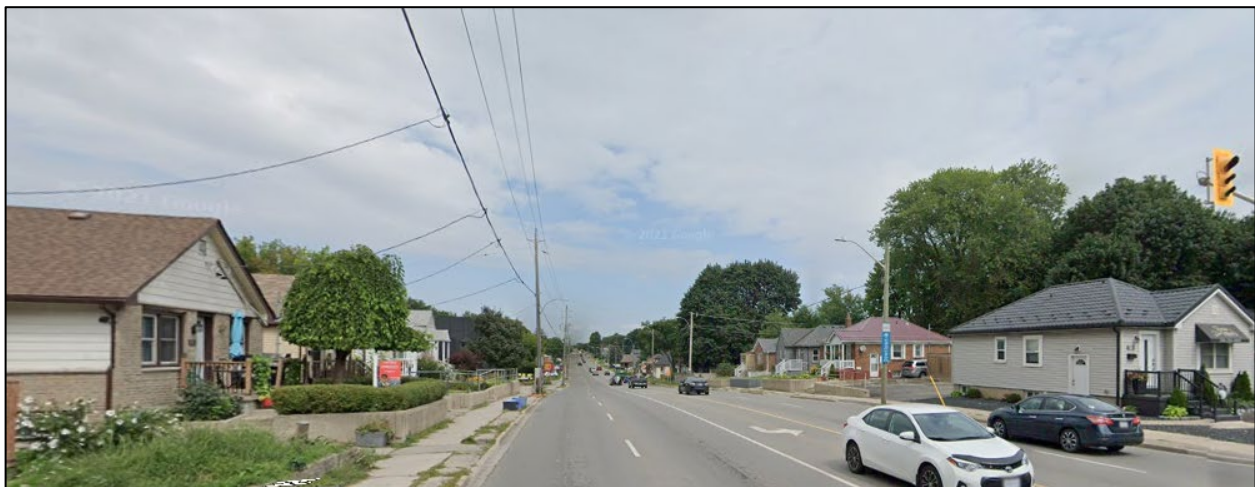
Notably, the character of Highbury Avenue North significantly differs from the character of Brydges Street and the residential streets in the adjacent neighbourhood. Both distinct area characteristics will be described; the character of the area along Highbury Avenue North, and the character of the residential neighbourhood north and west of the subject lands branching out from Brydges Street. The subject lands front both Highbury Avenue North and Brydges Street. Thus, consideration of the character of both the surrounding neighbourhoods is warranted.

The segment of Highbury Avenue North adjacent to the subject lands is classified as an *Urban Thoroughfare* according to The London Plan. The characteristics of an *Urban Thoroughfare*, as stated within The London Plan, include:

- Priority on through movement of vehicles and freight;
- Moves high volumes of traffic (pedestrian, cycle, and vehicular);
- High-quality pedestrian realm; and,
- High standard of urban design.

The existing streetscape along this segment of Highbury Avenue North consists of a variety of uses, including industrial, commercial, and residential. The subject lands abut industrial uses to the east, south, and west. The CN railway corridor and stock yard is located approximately 85.0m south of the subject lands. Small and large-scale commercial uses are located further south of the subject lands, in the form of a large commercial plaza and some stand-alone buildings. Low-density residential uses, primarily in the form of single detached dwellings, are located north and south of the subject lands along Highbury Avenue North, and further east beyond the LTC depot. Building heights proximate to the subject lands are generally 1- to 2-storeys in height.

**Figure 7 – Highbury Avenue North (looking north from Highbury Ave N and Brydges St intersection)**



**Figure 8 – Highbury Avenue North (looking south from Highbury Ave N and Brydges St intersection)**





The existing character of local streets within the immediate vicinity of the subject lands consists of a range of residential uses, including single detached dwellings, converted dwellings, and low-rise apartment buildings, generally 1- to 3-storeys in height along Brydges Street, Oakland Avenue, and other neighbouring streets. The neighbourhood is mature with predominantly older homes on modest lots, with a typical front yard setback of approximately 6.0m and a lot depth of approximately 30.0m for single family lots. Large, mature trees are located on many of the properties. Vehicular access is typically via driveways located in the front yard, and vehicular parking is typically surface parking. The exterior finishes of these dwellings are typically brick/masonry with vinyl siding and a mix of window styles and treatments.

**Figure 9 – Brydges Street (looking northwest from the subject lands)**



**Figure 10 – Oakland Avenue (looking north)**



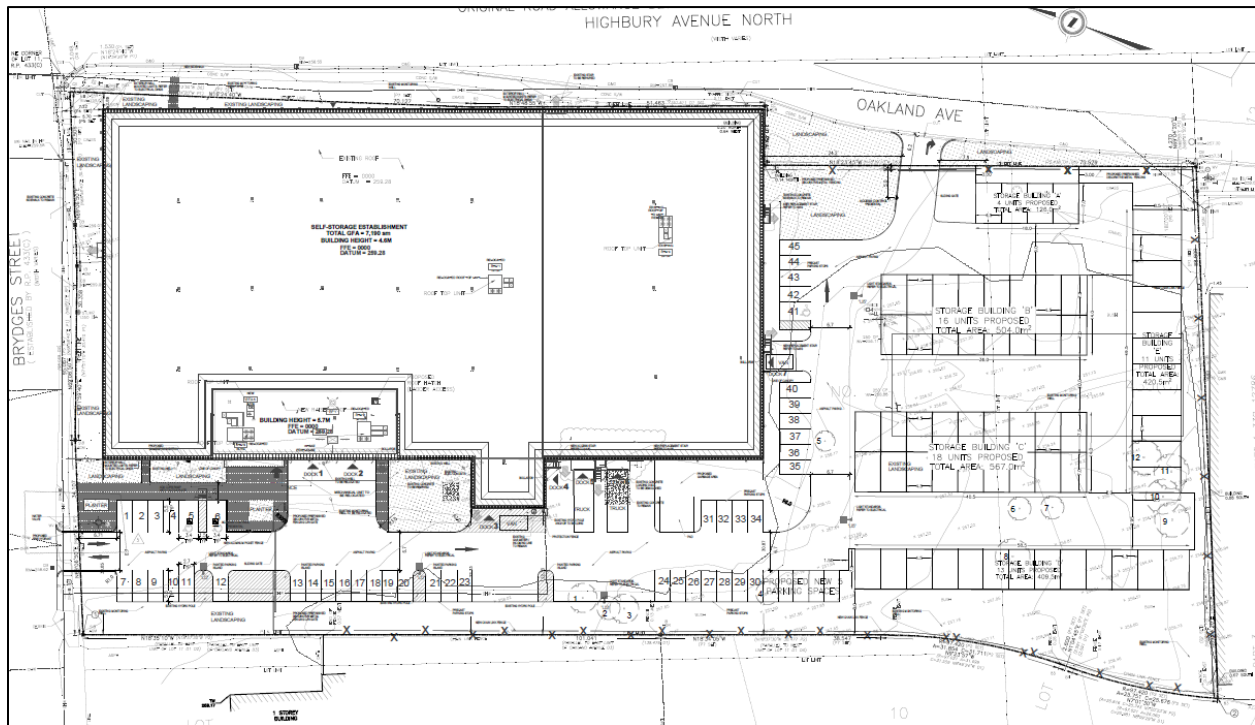
Lands within an 800m, 10-minute walk radius, are similar to those described above within 400m of the subject lands. They include low-density and medium-density residential uses, and some small-scale commercial uses, to the north; industrial, commercial, and low-density residential uses to the east and south; and, light and heavy industrial uses to the west. Several small-scale neighbourhood parks are located within 800m of the subject lands.

## 4.0 PROPOSED DEVELOPMENT

On April 4<sup>th</sup>, 2023, City of London Municipal Council approved a Zoning By-law Amendment to rezone the subject lands to the site-specific “Light Industrial (LI1(22))” zone with a special provision to permit self-storage establishment use within the existing building on the subject lands. Since this approval, the land owners have been working diligently to update and restore the existing building for a permitted self-storage facility.

The proposed development seeks to expand the self-storage use to include detached storage units on the southerly portion of the subject lands, which is generally cleared and underutilized. The proposed expansion comprises five stand-alone buildings with approximately 65 storage units (see Figure 11).

Figure 11 – Conceptual Site Plan (excerpt)



The redevelopment of the existing building was an adaptive reuse of a vacant building to a modern and aesthetically pleasing climate-controlled self-storage establishment. The conversion of the existing building to a self-storage establishment has revitalized the subject lands, which sat vacant for many years prior to its redevelopment.

The redevelopment of the existing building has enhanced the appearance of the building with modern updates, including new cladding and roofing, and improvements to building entrances and loading areas. The active portions of the subject lands, such as the building entrances and loading areas, are located away from the residential areas to the north, and as such, the self-storage establishment and associated outdoor storage facilities are not anticipated to have any

significant impact on the noise and traffic levels for the surrounding residential areas. Additionally, proximate industrial uses would not be adversely affected by the proposed development.

The subject lands are identified as being within the “*Brydges Street Area*” Special Policy Area in The London Plan, which permits a limited amount of commercial uses within an existing building. The Zoning By-law Amendment that was approved in April, 2023 was consistent with these policies. Due to a significant anticipated demand for storage units in this area, the owners are seeking an expansion of the self-storage use onto the underutilized, vacant area of the subject lands.

The proposed low-rise outdoor storage building renderings (as follows in Figures 12-13) are conceptual at this time and will be further refined through a future Site Plan Approval process. The overall design of the proposed buildings is intended to convey a modern light industrial appearance, while remaining respectful with the character of the surrounding neighbourhood. It is anticipated that a range of materials, colours, and textures will be provided in an aesthetically pleasing and compatible manner.

From a built-form perspective, the proposed buildings are appropriately positioned with their entrances oriented internal to the site, facing away from the street. The internal movements on the subject lands will generally be screened from view from pedestrians. The proposed development provides appropriate setbacks along the easterly, southerly, and westerly property lines to provide spatial separation from adjacent lots and to provide sufficient areas for landscaping. The proposed buildings are low-rise, being single-storey, and are sympathetic and complementary to the existing building on the subject lands.

Figure 12 – Conceptual Rendering

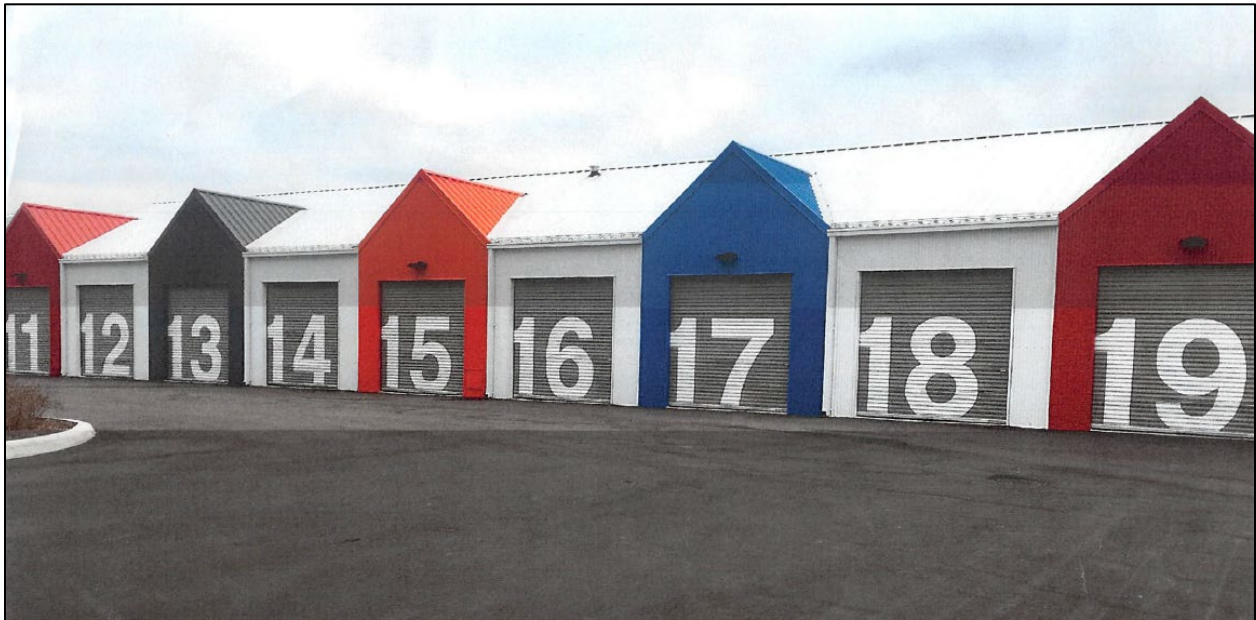
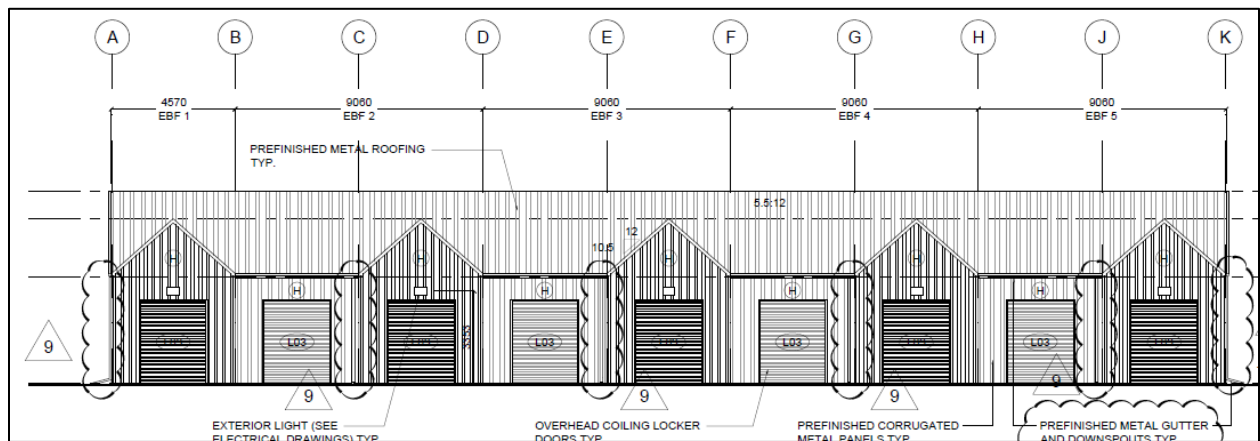


Figure 13 – Conceptual Elevation



## 5.0 PROPOSED AMENDMENTS

The current regulatory framework permits the self-storage establishment use only within the existing building on the subject lands. A site-specific Official Plan Amendment and Zoning By-law Amendment are required to permit the proposed detached self-storage buildings.

### 5.1 Official Plan Amendment

The subject lands are identified as being within the “*Brydges Street Area*” Special Policy Area in The London Plan, which permits a limited amount of commercial uses within an existing building. As such, the requested site-specific Official Plan Amendment seeks to permit the self-storage establishment use outside of the existing building.

The subject lands are identified as within the “*Light Industrial*” Place Type along an “*Urban Thoroughfare*” Street Classification in The London Plan, which permits industries that generate minimal planning impacts (i.e., less intensive industrial uses), and industrial uses which may require separation from heavy industrial uses.

It is our professional opinion that the proposed development is generally contemplated within these policies as it is not anticipated to generate an excessive amount of noise, odour, or other undesirable impacts, due to the internalized nature of its operations.

### 5.2 Zoning By-law Amendment

The subject lands are currently zoned a site-specific “*Light Industrial (LI1(22))*” zone with a special provision to permit the self-storage establishment use, within the existing building on the subject lands. As such, the requested site-specific Zoning By-law Amendment seeks to permit the detached self-storage buildings.

At this time, no other special regulations have been identified as necessary; however, additional special regulations may be identified through the planning process.

## 6.0 PLANNING ANALYSIS

The following sections of this report provide analysis on the proposed development and associated Official Plan Amendment and Zoning By-law Amendment applications with respect to applicable policy and regulatory documents.

### 6.1 Provincial Policy Statement (2020)

The Provincial Policy Statement (PPS), issued under the authority of Section 3 of the Planning Act, “provides policy direction on matters of provincial interest related to land use planning” in order to ensure efficient, cost-effective development and the protection of resources. All planning applications, including Official Plan Amendment and Zoning By-law Amendment applications, are required to be consistent with these policies.

The policy analysis describing how the proposed application is consistent with the stated policies within the PPS is detailed in the table below.

<b>Provincial Policy Statement (2020) Policy Analysis Table</b>	
<b><i>Policy</i></b>	<b><i>Response</i></b>
<p><b><u>Section 1.1.1 Managing and Directing Land Use [...]</u></b></p> <p>Healthy, liveable and safe communities are sustained by:</p> <ul style="list-style-type: none"> <li>a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;</li> <li>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;</li> <li>g) ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;</li> </ul>	<p>The proposed development promotes efficient development and land use patterns by permitting a desirable use on underutilized lands.</p> <p>The expansion of the existing permitted use is a cost-effective form of development that is anticipated to utilize existing municipal services within an existing built-up area of the City. Thus, the consumption of land and servicing costs are minimized.</p>
<p><b><u>Section 1.1.3.1 Settlement Areas</u></b></p> <p>Settlement areas shall be the focus of growth and development.</p>	<p>The subject lands are located within a settlement area, being within the built-up area of the City of London.</p>
<p><b><u>Section 1.1.3.2 Settlement Areas</u></b></p> <p>Land use patterns within settlement areas shall be based on densities and a mix of land uses which:</p> <ul style="list-style-type: none"> <li>a) efficiently use land and resources;</li> <li>b) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available,</li> </ul>	<p>The proposed development contributes to the range of land uses in the immediate area. It makes efficient use of underutilized land, resources, infrastructure, and existing transportation networks by reusing the subject lands. It is anticipated that there is sufficient infrastructure capacity to</p>

<p>and avoid the need for their unjustified and/or uneconomical expansion; f) are transit-supportive, where transit is planned, exists or may be developed;</p>	<p>adequately service the subject lands through full municipal services. The subject lands are serviced by pedestrian sidewalks via the Highbury Avenue North and Brydges Street rights-of-way, supporting the use of active transportation; and, are situated along existing transit routes, supporting existing transit opportunities.</p>
<p><b><u>Section 1.1.3.4 Settlement Areas</u></b> Appropriate development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety.</p>	<p>The L11 zone provides for appropriate regulations, including lot requirements, building setbacks, lot coverage, and parking that are established as appropriate for the subject lands. There are no risks to public health and safety from the proposed development. There are no special zoning provisions being requested aside from the expansion of the permitted use.</p>
<p><b><u>Section 1.6.6.2 Sewage, Water and Stormwater</u></b> Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services.</p>	<p>The proposed development will make full use of municipal services and it is anticipated that there is existing sufficient capacity to support the development.</p>
<p><b><u>Section 2.6.1 Cultural Heritage and Archaeology</u></b> Significant built heritage resources and significant cultural heritage landscapes shall be conserved.</p>	<p>There are no undue adverse impacts anticipated from the proposed development on significant built and cultural heritage resources, as the existing character of the subject lands is to remain generally unchanged.</p>

Given the above, the proposed development and associated Official Plan Amendment and Zoning By-law Amendment applications generally conform to the 2020 Provincial Policy Statement.

## 6.2 City of London 2016 Official Plan

The 2016 Official Plan (The London Plan) is the policy framework for all planning in London. It emphasizes growing inward and upward to reduce the costs of growth, creating walkable communities, revitalizing urban neighbourhoods and business areas, protecting farmlands, and reducing greenhouse gases and energy consumption.

The subject lands are identified as being within the “Light Industrial” Place Type (Figure 14) along an “Urban Thoroughfare” Street Classification, and within the “Brydges Street” Specific Policy Area (Figure 15) in The London Plan.

Figure 14 – The London Plan Map 1: Place Types

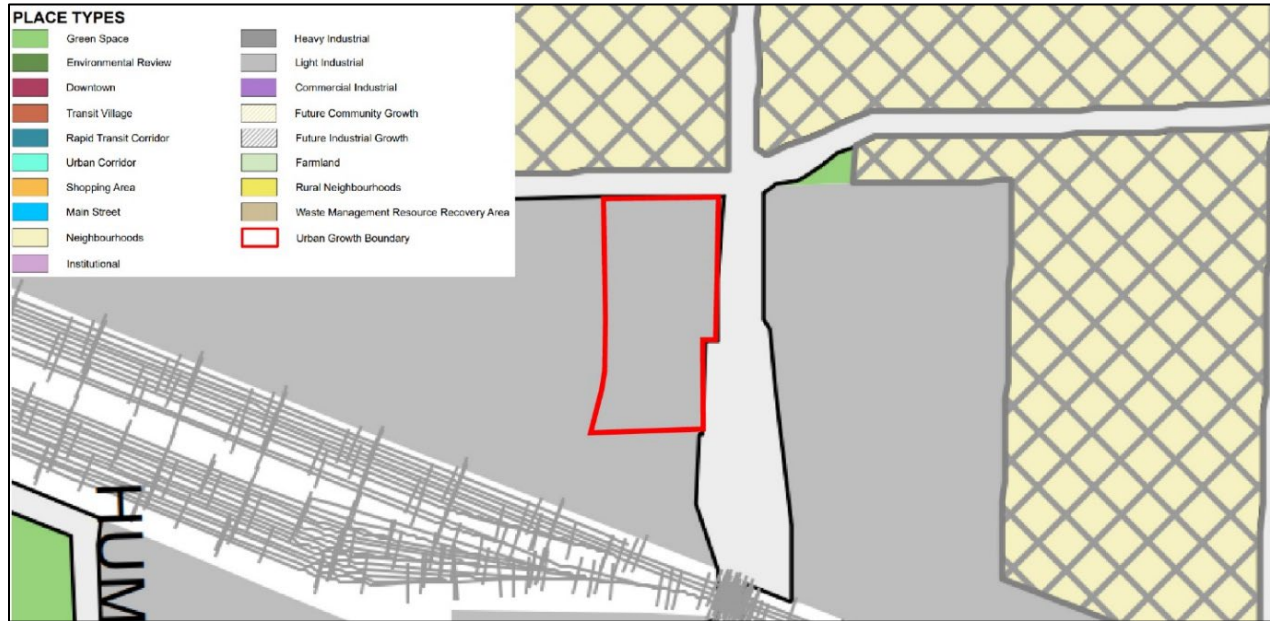
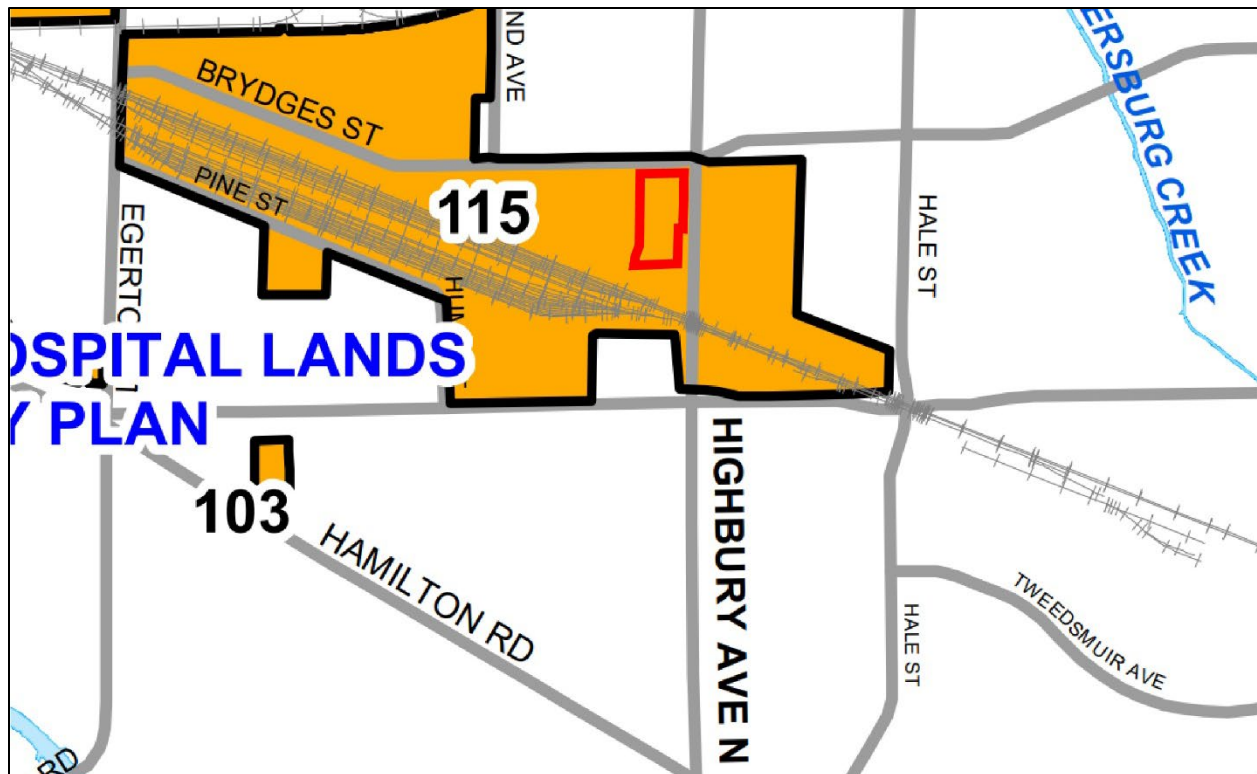


Figure 15 – The London Plan Map 7: Specific Policy Areas





**Section 1110\_** states that the *Light Industrial* Place Type is where industries that generate minimal planning impacts (i.e., less intensive industrial uses) will be permitted. The following table contains a policy analysis detailing how the proposed development conforms with The London Plan and the *Light Industrial* Place Types policies:

<b>The London Plan (2016) Policy Analysis Table</b>	
<p><b><u>Section 1115 Permitted Uses in Light Industrial Place Type</u></b></p> <p>The following uses may be permitted in the Light Industrial Place Type:</p> <ol style="list-style-type: none"> <li>1. A broad range of industrial uses that are unlikely to impose significant impacts on surrounding light industrial land uses due to their emissions such as noise, odour, particulates and vibration, may be permitted.</li> </ol>	<p>The proposed development is generally contemplated within these policies as it is not anticipated to generate an excessive amount of noise, odour, or other undesirable impacts, due to the predominantly internalized nature of its operations. Municipal Council has acknowledged that the permitted use is appropriate on the subject lands through the previous approval to permit the self-storage use.</p>
<p><b><u>Section 1124 Intensity Policies for all Industrial Place Types</u></b></p> <p>The following intensity policies apply within all Industrial Place Types:</p> <ol style="list-style-type: none"> <li>1. Industrial uses will be encouraged to utilize land efficiently. High building coverage ratios and high employment densities will be sought wherever possible.</li> <li>2. The intensity of industrial uses may be moderated by zoning regulations, where appropriate, to limit the extent of their noise, vibration, dust and odour emissions.</li> </ol>	<p>The proposed development provides an adequate lot coverage, and will utilize zoning regulations that are generally applied to this type of development, including appropriate building setbacks and parking. As previously mentioned, there are no special zoning provisions being requested relating to setbacks, lot coverage, or parking.</p>
<p><b><u>Section 1125 Form Policies for all Industrial Place Types</u></b></p> <p>The following form policies apply to all Industrial Place Types:</p> <ol style="list-style-type: none"> <li>6. Loading facilities will be located in areas that minimize visual impact to other industrial uses and the street.</li> <li>7. Sites will be large enough to accommodate on-site truck movements for loading, unless it is deemed appropriate to utilize streets where there are no viable alternatives.</li> </ol>	<p>The subject lands provide an appropriate lot size and site layout to accommodate on-site movements for loading trucks and visitors. Existing loading spaces are located in the rear yard to minimize the visual impact to the adjacent residential neighbourhood and to the pedestrian travelling along Highbury Avenue North.</p>
<p><b><u>Section 252 Site Layout</u></b></p> <p>The site layout of new development should be designed to respond to its context and the existing and planned character of the surrounding area.</p>	<p>The site layout has been appropriately designed as to fit within its surroundings and to be compatible with the existing neighbourhood. The existing building addresses both the Highbury Avenue North and Brydges Street frontages, providing a positive experience for the traveling pedestrian. The proposed self-storage establishment use acts as a transition between the industrial areas and adjacent residential neighbourhood. The proposed detached storage units provide appropriate spatial</p>

	separation between the buildings and property lines to implement meaningful landscaping and/or tree plantings to screen the buildings from pedestrian-level views.
<p><b><u>Section 253 Site Layout</u></b> Site layout should be designed to minimize and mitigate impacts on adjacent properties.</p>	The existing building is situated less than 1.0m from the easterly property line, being Highbury Avenue North. This layout provides suitable space in the rear yard for parking and loading facilities, generally screened from view from both the adjacent streets and the adjacent residential neighbourhood. Landscaped elements are proposed along the westerly, southerly, and easterly lot lines to act as screenings and buffers between the subject lands and the adjacent lands to the west, south, and east.
<p><b><u>Section 259 Site Layout</u></b> Buildings should be sited with minimal setbacks from public streets and public spaces to create an inviting, active and comfortable pedestrian environment.</p>	The existing building provides a front yard setback of 0.64m which maintains the existing street wall established along Highbury Avenue North and ensures a compatible relationship between the built-form and the public realm.
<p><b><u>Section 266 Site Layout</u></b> Loading, garbage and other service areas will be located so that they will not have a negative visual impact from the street or detract from pedestrian connections.</p>	The existing development provides servicing and loading facilities in the rear yard to minimize visual impact. The proposed development will utilize these facilities.
<p><b><u>Section 272 Parking</u></b> The impact of parking facilities on the public realm will be minimized by strategically locating and screening these parking areas. Surface parking should be located in the rear yard or interior side yard.</p>	The proposed site layout locates loading areas and surface parking in the rear yard. Its positioning in relation to the existing building generally screens the surface parking areas from the street.
<p><b><u>Section 290 Buildings</u></b> Buildings located on corner sites should address the corner through building massing, location of entrances, and architectural elements.</p>	The existing building is oriented the towards both Highbury Avenue North and Brydges Street, which establishes a clearly defined street wall. High-quality architectural details will be provided to enhance the visual identity of the street character.
<p><b><u>Section 1140A Brydges Street Area</u></b> Within the Brydges Street Area, as shown on Map 7, a limited amount of commercial uses may be permitted, through a site-specific zoning by-law amendment provided the following conditions can be met:</p> <ol style="list-style-type: none"> <li>1. The commercial use is located within an existing building.</li> <li>2. Additions to or enlargement of the building to accommodate commercial uses will be discouraged. Substantial additions or alterations to existing building to accommodate commercial uses will not be permitted.</li> <li>3. The commercial use does not fit will within the Downtown, Transit Village, Rapid</li> </ol>	<p>A Zoning By-law Amendment was approved by Municipal Council in April, 2023 which permitted the self-storage use (considered a commercial use as per The London Plan) within the existing building on the subject lands.</p> <p>The proposed Official Plan Amendment seeks to permit detached self-storage buildings on the southerly, vacant and underutilized portion of the subject lands.</p> <p>The proposed expansion of the permitted self-storage use on the subject lands is a logical form of development for the subject lands. Implementing</p>

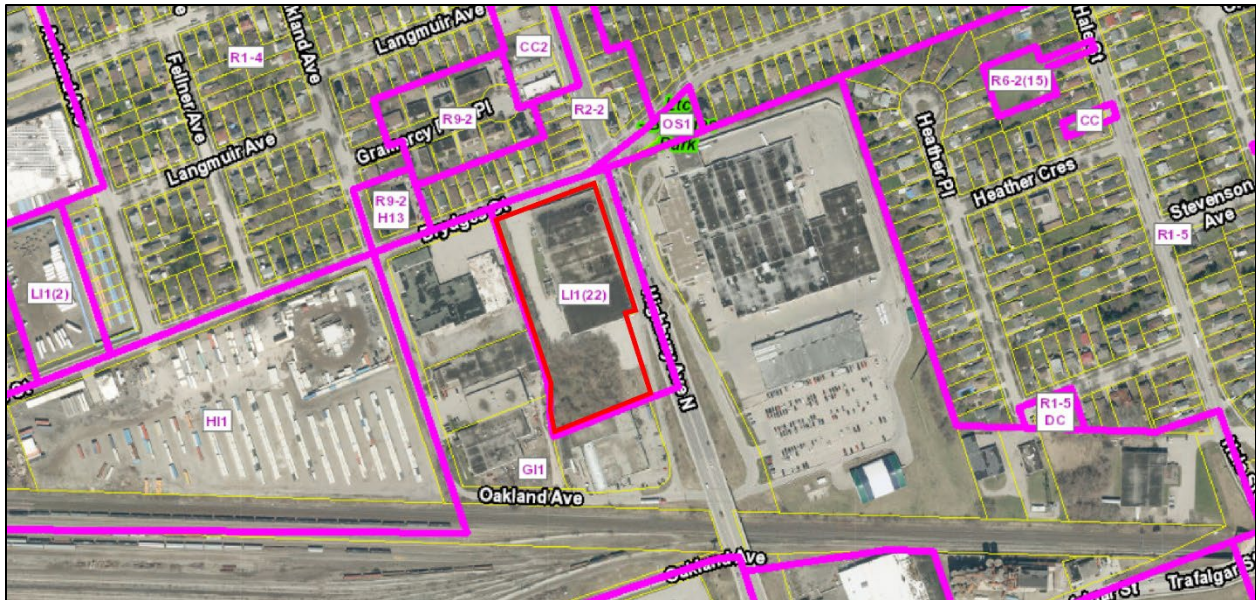
<p>Transit Corridor, Urban Corridor, Shopping Area or Main Street Place Type due to its planning impacts.</p> <ol style="list-style-type: none"> <li>4. The commercial use may generate noise, vibration or emission impacts.</li> <li>5. The commercial use may generate large volumes of truck traffic.</li> <li>6. The commercial use may require large storage and/or display space.</li> <li>7. Minor variances to accommodate additional parking or minor variances that could have an impact on the industrial operations in the area will be discouraged.</li> <li>8. The commercial use would not prevent the future re-use of the buildings for industrial uses.</li> <li>9. The commercial use does not generate significant additional traffic that will interfere with the industrial uses or operations in the area.</li> <li>10. The commercial use does not constitute a sensitive land use which would have an impact on, or would impair or interfere with the existing or planned industrial use of the area.</li> </ol>	<p>a traditional Light Industrial use on the vacant portion of the lands may result in incompatibilities with the use within the existing building. The proposed expansion will ensure the land use on the subject lands is consistent, and avoid any potential compatibility issues.</p> <p>The existing site layout already accommodates the necessities of a self-storage development, including required parking and loading spaces. The proposed development does not require any other variance or special zoning provision to accommodate the proposed expansion.</p> <p>While the expansion of the self-storage use may generate some additional traffic, it is inherently a low-traffic land use and is not anticipated to have any undue impacts on the surrounding neighbourhood.</p> <p>The self-storage use is, in our professional opinion, a quasi-industrial use which will not interfere with the existing industrial operations in the area.</p>
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The proposed development represents an appropriate and compatible form of development at an appropriate location. The proposed Zoning By-law Amendment to permit the expansion of the self-storage establishment use is generally in conformity with the policies and intent of The London Plan and is consistent with the planned function of the *Light Industrial* Place Type.

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

The subject lands are zoned “*Light Industrial 1 (LI1(22))*” in the City of London Zoning By-law (Figure 16).

Figure 16 – Zoning



The *LI1(22)* zone permits the self-storage establishment use within the existing building only.

A self-storage establishment use is appropriate for the subject lands, as noted throughout this report. No undue adverse impacts on adjacent lands are anticipated as a result of the proposed expansion of the use. The *LI1* zone provides for appropriate regulations, including lot requirements, building setbacks, lot coverage, and parking that are established as appropriate for the subject lands.

Table 1 provides a breakdown of the regulations of the *LI1(22)* zone, as well as a comparison to the built form regulations exhibited in the Concept Plan. Site-specific development standards are to be confirmed and refined subject to a review of the application by Staff through the approvals process.

**Table 1 – Zoning Statistics**

	<b>Existing Regulations</b>	<b>Concept Plan</b>
<b>Zone</b>	<b>LI(22)</b>	<b>L1(□)</b>
<b>Permitted Use</b>	Self-storage establishment	Self-storage establishment
<b>Lot Area (min.)</b>	2,500m <sup>2</sup>	17,826m <sup>2</sup>
<b>Lot Frontage (min.)</b>	30.0m	115.7m
<b>Front Yard Setback (Highbury Ave N – min.)</b>	0.64m	0.64m
<b>Interior Side Yard Setback (min.)</b>	2.4m	75.6m
<b>Exterior Side Yard Setback (Brydges St – min.)</b>	1.5m	3.4m
<b>Rear Yard Setback (min.)</b>	2.4m	22.2m
<b>Building Height (max.)</b>	50.0m	6.0m
<b>Lot Coverage (max.)</b>	60%	52%
<b>Landscaped Open Space (min.)</b>	10%	19%
<b>Off-street Parking (min.)</b>	5 spaces (1 per 2,000m <sup>2</sup> GFA)	50 spaces
<b>Loading Spaces (min.)</b>	3 spaces	7 spaces

**\*Denotes required special provision.**

No site-specific regulations, including lot requirements, yard setbacks, or parking reductions, are required. It is our professional opinion that the proposed Zoning By-law Amendment to permit the expansion of the self-storage establishment use on the subject lands is appropriate.

## 7.0 ADDITIONAL CONSIDERATIONS

### 7.1 Public Consultation Strategy

It is proposed that the public consultation process for the proposed applications follow the statutory requirements as set forth in the *Planning Act*. The following procedure of public consultation is proposed:

- Adequate information and material, including a copy of the proposed development, to be made available to the public;
- A public meeting be held for the purpose of giving the public an opportunity to make representations in respect of the proposed development; and,
- If deemed necessary, an open house be held for the purpose of giving the public an opportunity to review and ask questions about the information and material made available.

The consultation strategy proposed will provide members of the public with meaningful opportunities to review, understand, and comment on the proposed development and associated applications.

### 7.2 Tree Preservation Report

Ron Koudys Landscape Architects Inc. (RKLA) was retained to prepare a tree assessment report in conjunction with the proposed development at 455 Highbury Avenue North. The intent of the report was to summarize the findings of the tree assessment and make recommendations regarding tree preservation and removal based on tree health.

As previously mentioned in this report, in May 2023, the majority of the trees in the southwest corner of the subject lands were removed in compliance with a permit and authorization granted by the City of London Forestry Operations. 12 trees were retained, and a replanting plan was provided to Forestry Operations at the time of acquiring the permit. However, the layout and siting of the proposed detached self-storage buildings means that the previously proposed preservation plan will need to be amended.

The recommendations of the tree preservation report are as follows:

- Removal of all 12 trees located within the subject site.
- Following pre-, during-, and post-construction recommendations outlined in the Construction Impact Mitigation Recommendations in the report.

It is our opinion that, by means of the tree removal permit which approved the removal of the majority of the trees on the subject lands, the *Tree Protection* overlay on the southwest corner of the subject lands is not applicable, and that it may be appropriate for City staff to arrange to have this overlay removed as part of this application.

## 8.0 CONCLUSIONS

The proposed Official Plan Amendment and Zoning By-law Amendment seek to permit an expansion of the permitted self-storage establishment use on the subject lands. The subject lands represent an appropriate opportunity to expand the self-storage establishment use on the subject lands, as it would make an efficient use of vacant, underutilized lands. The subject lands are an appropriate location for an expanded self-storage establishment, as they are fully serviced by municipal services, and are located along a major arterial road in the City with good access to the general public.

The subject lands are located in an area of the City where it has been difficult to attract new industrial uses, and which has experienced pressures to transition away from traditional industrial uses. The proposed self-storage establishment conforms to the general criteria of permitted uses within the *Light Industrial* Place Type. Furthermore, the existing approved self-storage establishment acts as a compatible transitional use between the surrounding industrial, commercial, and residential uses.

The active portions of the subject lands, such as the building entrances and loading areas, are located away from the residential areas to the north, and as such, the expansion of the self-storage establishment is not anticipated to have any significant impact on the noise and traffic levels to the surrounding residential areas. Additionally, proximate industrial uses would not be adversely affected by the proposed development. The expansion of the self-storage establishment use outside of the existing building is not anticipated to have any adverse impacts on the surrounding neighbourhood and land uses.

The proposed Official Plan Amendment and Zoning By-law Amendment to permit the expansion of the self-storage establishment use on the subject lands is appropriate as the proposed development conforms with the general intent of The London Plan, and would pose no significant undue impacts on surrounding land uses.

Based on the above, and as detailed throughout this Planning Justification Report, the proposed development is consistent with the intent and policies as set forth in provincial and municipal planning legislation. As such, the proposed amendments are considered appropriate and represent good land use planning.