

PLANNING JUSTIFICATION REPORT

KAP Holdings Inc.

**2-4 Audrey Avenue & 186-188 Huron Street
London, ON**



July 2, 2024



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1.0 INTRODUCTION

This Planning Justification Report has been prepared in support of an application for a Zoning By-law Amendment to permit a proposed cluster townhouse development, located at 2-4 Audrey Avenue and 186-188 Huron Street, London (hereinafter referred to as the “subject lands”).

The proponent, KAP Holdings Inc., intends to merge the four (4) parcels into one (1) larger property under the same ownership to facilitate the construction of cluster townhouse units.

2.0 SUMMARY

This report concludes that the proposed development and associated Zoning By-law Amendment are appropriate and desirable for the following reasons:

- The proposed Zoning By-law Amendment is consistent with the 2020 Provincial Policy Statement, and The London Plan;
- The proposed development meets the intent and purpose of the “*Neighbourhoods*” Place Type policies in The London Plan;
- The proposed Zoning By-law Amendment will permit a back-to-back townhouse development with an appropriate density given its proximity to a Rapid Transit Corridor, commercial and institutional uses, and open spaces; strong transit connections; and, full access to municipal services;
- The site layout will contribute to an active pedestrian-oriented design. Appropriate separation is provided between the proposed development and the abutting residential uses, ensuring compatibility and maintaining the intent and purpose of The London Plan;
- The proposed intensification is desirable and is a positive addition to the neighbourhood.

3.0 SUBJECT LANDS

3.1 Site Description

The subject lands are comprised of four (4) rectangular-shaped parcels, located on the north side of Huron Street, on the east side of Audrey Avenue. The subject lands have an approximate total frontage of 37.1m (121.7ft) along Huron Street, an approximate total lot frontage of 53.9m (176.8ft) along Audrey Avenue, and a total approximate lot area of 1,709.3m² (18,398.8ft²) (Figure 1).

Figure 1: Location map of the subject lands (Source: Interactive mapping of City of London)



The subject lands are currently occupied by four (4) (one per parcel) single-detached dwellings of varying heights (Figures 2-6), with associated parking areas and amenity spaces. The subject lands are generally flat in topography.

Figure 2: Existing residential dwellings on the subject lands (looking north on Huron Street)

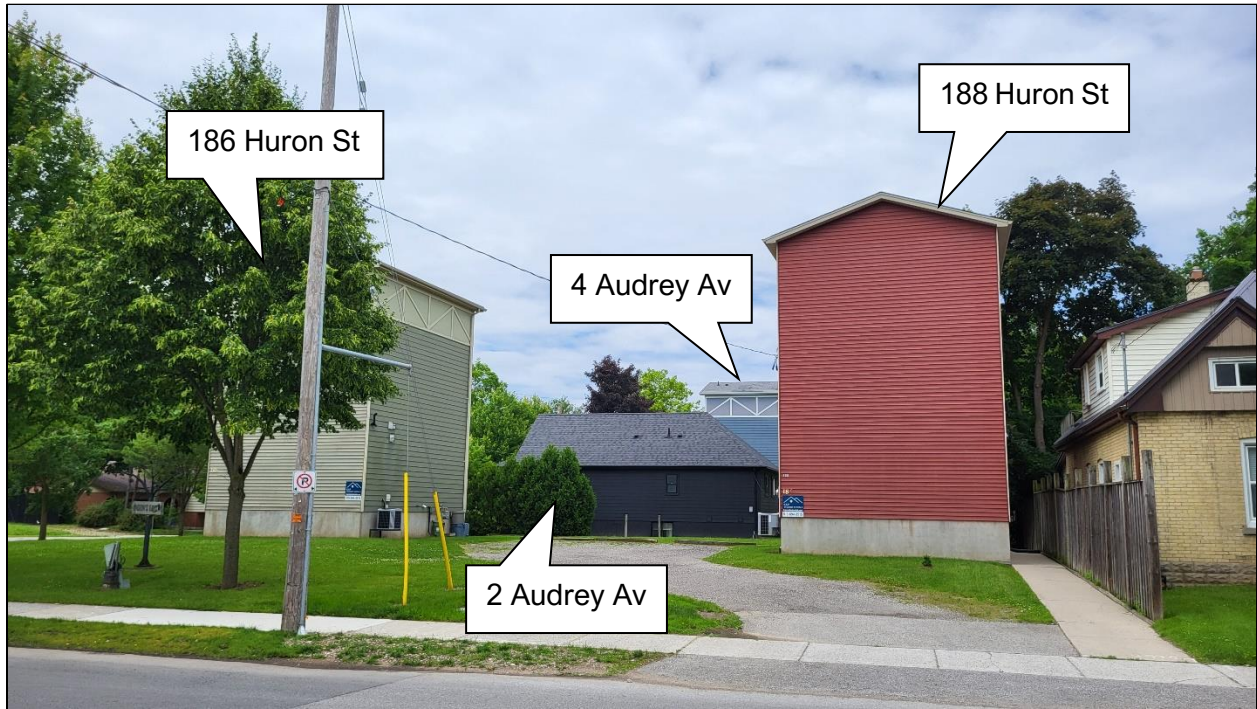


Figure 3: Existing residential dwelling at 2 Audrey Avenue (existing dwelling on 4 Audrey Avenue to the left)



Figure 4: Existing 3-storey residential dwelling at 4 Audrey Avenue

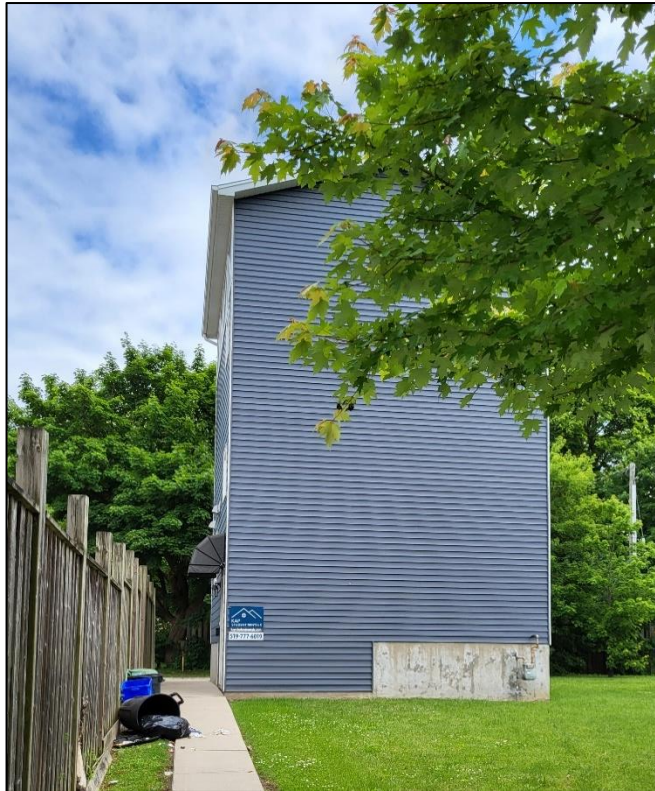


Figure 5: Existing 3-storey residential dwelling at 186 Huron Street



Figure 6: Existing 3-storey residential dwelling at 188 Huron Street



Vehicular access is provided by one driveway located on Huron Street (Figure 7), two driveways along Audrey Avenue (Figures 8 and 9), and vehicular access in the rear yard of 4 Audrey Street via an existing private laneway (Figure 10).

Figure 7: Existing driveway from Huron Street



Figure 8: Existing driveway from Audrey Avenue



Figure 9: Existing driveway from Audrey Avenue



Figure 10: Existing laneway from Audrey Avenue



Public sidewalks are available on both sides of Huron Street (Figure 11) and Audrey Avenue (Figure 12). Access to the Thames River Valley Parkway is available to the west at the terminus of Huron Street (Figure 13).

Figure 11: Public sidewalks on Huron Street - looking west (Subject lands to the right).



Figure 12: Public sidewalks on Audrey Avenue - looking north (Subject lands to the right).



Figure 13: Thames Valley Parkway



The subject lands have access to London Transit Commission bus routes #6 (University Hospital – Parkwood Institute), #13 (Masonville Place – White Oaks Mall), and #102 (Downtown – Natural Science), available along Richmond Street, approximately 155m to the east of the subject lands. In addition, the subject lands are within walking distance of the main campus of Western University and the main campus of King’s University College.

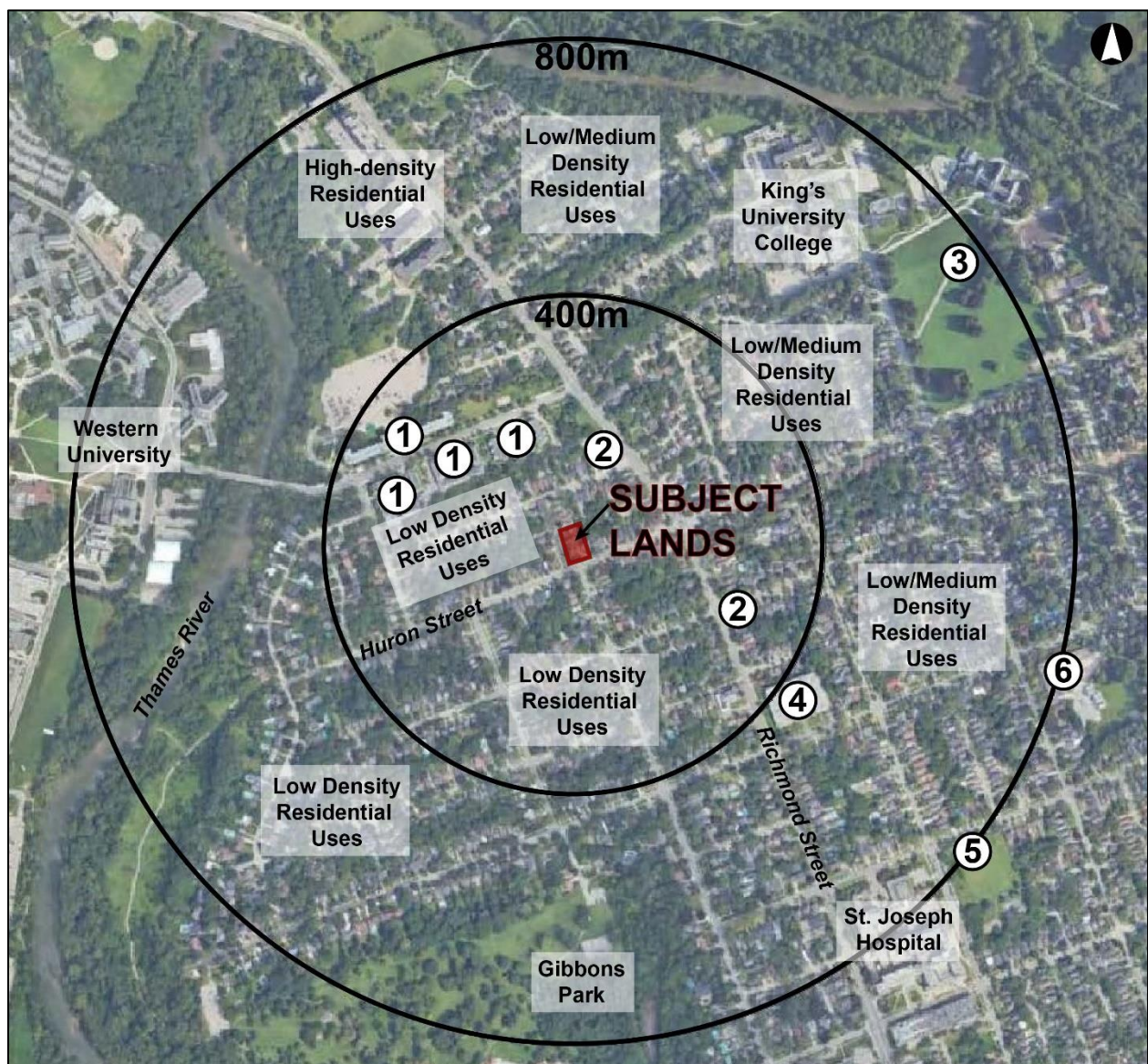
3.2 Spatial Analysis and Neighbourhood Character

Figure 4 illustrates the surrounding land uses, as well as, notable features within a 400-metre and 800-metre buffer radius in relation to the subject lands. Importantly, the two radii represent the walking distances of approximately 5 and 10 minutes, respectively; however, due to sidewalk networks and other pedestrian barriers, the radii may not represent true walking times.

Notable features, labeled with corresponding numbers in Figure 14, within 400m and 800m include:

1. On-campus residences;
2. Convenience commercial uses;
3. St. Peter's Seminary;
4. Retirement residence;
5. Doidge Park;
6. Old North Public School

Figure 14: Spatial Analysis – Surrounding Context



Lands within 400m are characterized by a mix of land uses, predominantly consisting of low-density residential uses in the form of one and two-storey single-detached dwellings (Figures 15 and 16). On-campus residences, in the form of apartment buildings, are located to the northwest of the subject lands (Figures 17 and 18). Converted dwellings and medium-density type housing are located to the east of Richmond Street. Commercial uses, generally limited to convenience-type commercial uses, are located along both sides of Richmond Street.

Lands within an 800m, 10-minute walk radius are still predominantly characterized by low-density residential uses, being generally comprised of one and two-storey single-detached dwellings. Medium-density residential uses are generally located to the northeast and east of the surrounding area. High-density residential uses are located to the north of the 800m radius. A retirement residence is located approximately 450m southeast of the subject lands. Institutional uses include Western University Campus, located to the northwest, King's University College Campus and St. Peter's Seminary located to the northeast, St. Joseph Hospital and Old North Public School located to the southeast. Open spaces include Gibbons Park and Doidge Park, located to the south and southeast respectively; and, the Thames River, which runs through the west and is surrounded by vegetated areas.

Figure 15: Single-detached dwellings south of the subject lands on Huron Street



Figure 16: Single-detached dwellings south of the subject lands on Huron Street



Figure 17: Student housing (Medway Hall) northwest of the subject lands on University Drive



Figure 18: Student housing (Alumni House) northwest of the subject lands on University Drive



3.3 Design Goals and Objectives

The subject lands are well-served by roads, public transit, utilities and municipal services; and, are within walking distance of institutional and convenience commercial uses.

The surrounding area is characterized by land uses that are predominantly comprised of low-density residential uses, including medium-density residential areas in the form of cluster housing and low-rise apartments and high-density residential uses in the form of high-rise apartments. The subject lands are large enough to accommodate a medium-density development while providing an appropriate site layout.

Based on the above, the design goals for the redevelopment of the subject lands are as follows:

- Provide a form of infill development that makes efficient use of the subject lands for uses that are contemplated under the current policy and regulatory framework; compatible with, and complementary to, existing and planned development in the area; and, appropriate for available and planned services, infrastructure, and transportation facilities;
- Provide appropriate design standards that result in compatibility with adjacent lands and the surrounding neighbourhood, specifically addressing matters such as siting, scaling, massing, and pedestrian realm;
- Locate entrances, ground-level windows, and other active features along the public sidewalk to establish a clear pedestrian focus, achieving a pedestrian-friendly environment;
- Ensure parking is well-screened and buffered from adjacent low-density residential uses and public rights-of-way, contributing to a pedestrian-oriented environment.

4.0 PROPOSED DEVELOPMENT

4.1 Site Design

The four (4) rectangular-shaped parcels that comprise the subject lands are proposed to be consolidated into one parcel to facilitate the construction of two (2) blocks of back-to-back townhouses (Figure 19). A total of fourteen (14) dwelling units and one (1) accessory building are proposed on the subject lands with associated sidewalks and parking areas, resulting in a residential density of 82 units per hectare (UPH).

The northerly portion of the subject lands is proposed to be redeveloped for a 6-unit, 3-storey back-to-back townhouse block. The existing 1-storey dwelling on 2 Audrey Avenue is proposed to be removed to facilitate the construction of 3-storey additions to the existing 3-storey single-detached dwelling on 4 Audrey Avenue to create a total of six (6) residential units. A 1-storey accessory building is proposed on the northeasterly portion of the subject lands to provide a common indoor amenity area for the subject lands.

The southerly portion of the subject lands are proposed to be redeveloped for an 8-unit, 3-storey back-to-back townhouse block. The two existing 3-storey single-detached dwellings on 186-188 Huron Street will be maintained and 6-unit, 3-storey additions are proposed to the existing residential dwellings to create a total of eight (8) residential units.

The dwelling footprints vary from approximately 42.7m² to 44.2m², and each residential unit is proposed to have a total of 5 bedrooms. The common indoor amenity area (accessory building) is proposed to have a total area of approximately 49.9m².

A total of 14 parking spaces are provided for the proposed redevelopment, including one Type A accessible parking space. Three (3) parking spaces located on the northeasterly portion of the subject lands are proposed to be maintained with access from the existing adjacent laneway. Twelve (12) parking spaces are proposed between the two (2) back-to-back townhouse blocks. A new driveway is proposed to provide access from Audrey Street to the central parking area. A total of 2 short-term bicycle parking spaces are provided for the proposed development, located to the west of the central parking area.

Pedestrian connections are provided from the public sidewalk to a proposed internal sidewalk, which leads to the dwelling units, accessory building and bicycle and parking areas.

Figure 19: Site plan (excerpt)



4.2 Built Form, Massing and Articulation

The proposed site design will enhance the public realm by providing minimal front and exterior yard setbacks (4.5m) and active walls along two public streets (Huron Street and Audrey Avenue).

The townhouses are proposed to have a height of 10.3m, whereas a maximum of 12.0m is permitted on the subject lands. The proposed form and massing can be accommodated on-site through appropriate setbacks, buffering, and compatible façade design.

Overall, the additions are proposed to have the same design elements as the existing single-detached dwellings on 4 Audrey Avenue and 186-188 Huron Street.

4.3 Architectural Treatment

The concept material palette for the proposed cluster townhouse development consists of high-quality, durable materials that balance sustainability and functionality with visual appearance and cost.

The exterior façade of the cluster townhouses will mostly be wood cladding to protect against exposure to the elements, prevent heat loss, and visually unify the façade. Windows are provided at regular intervals, supporting a defined rhythm of solid-void that supports order and cohesion on all facades. Conceptual elevations are shown in Figures 20-28. Detailed building elevations will be refined in coordination with City staff as part of future Site Plan Approval and Building Permit applications.

Figure 20: North elevation for the proposed townhouse block facing Huron Street



Figure 21: South elevation for the proposed townhouse block facing Huron Street



Figure 22: East elevation for the proposed townhouse block facing Huron Street

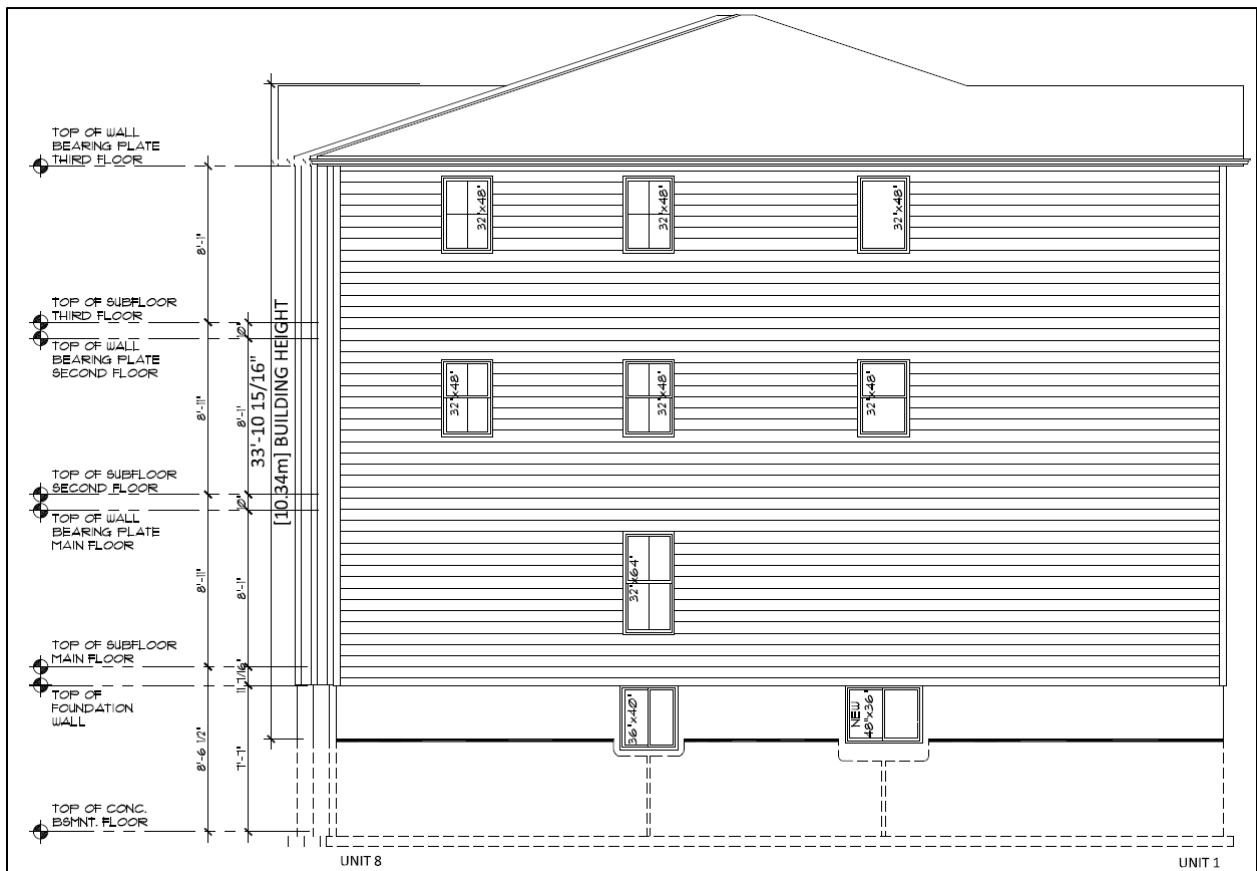


Figure 23: West elevation for the proposed townhouse block facing Huron Street



Figure 24: West elevation for the proposed townhouse block facing Audrey Avenue



Figure 25: North elevation for the proposed townhouse block facing Audrey Avenue



Figure 26: East elevation for the proposed townhouse block facing Audrey Avenue



Figure 27: South elevation for the proposed townhouse block facing Audrey Avenue

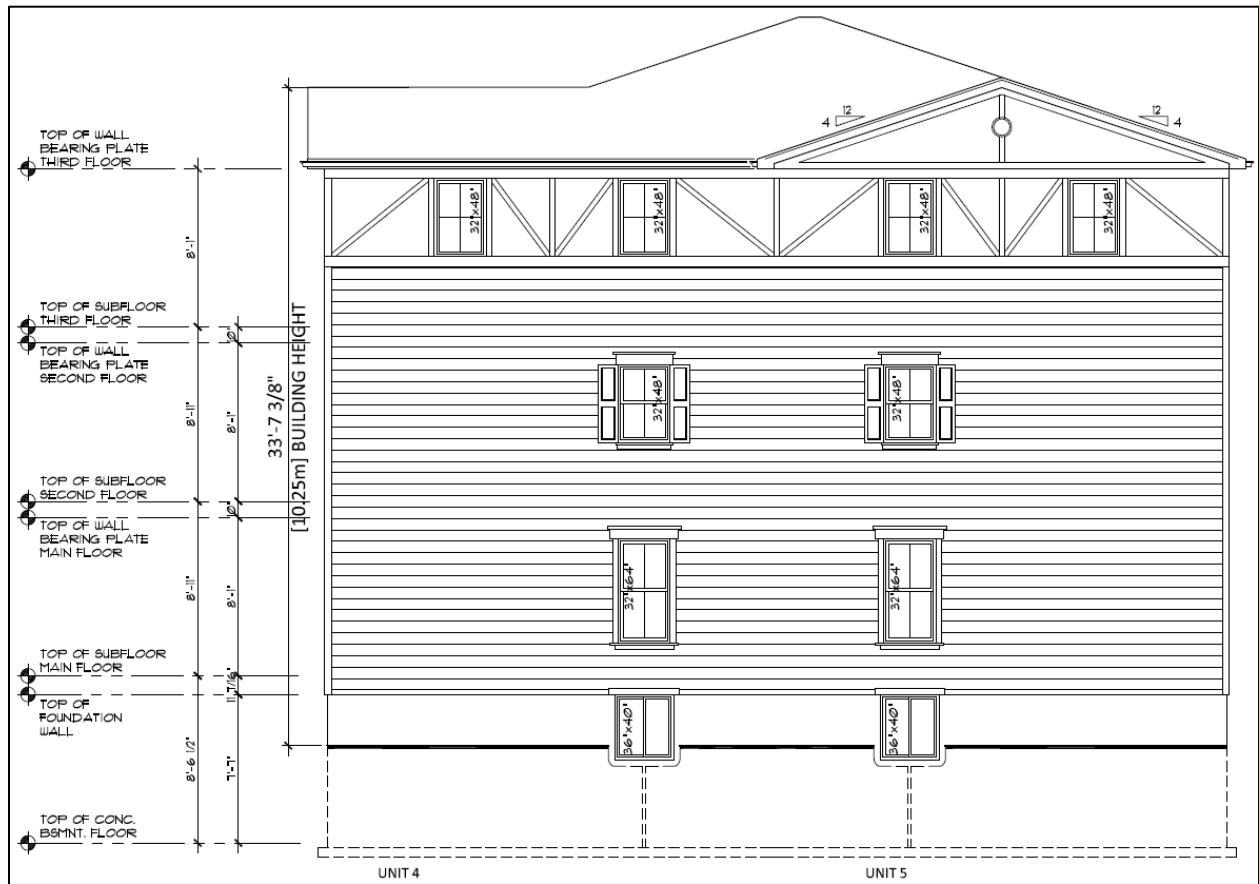
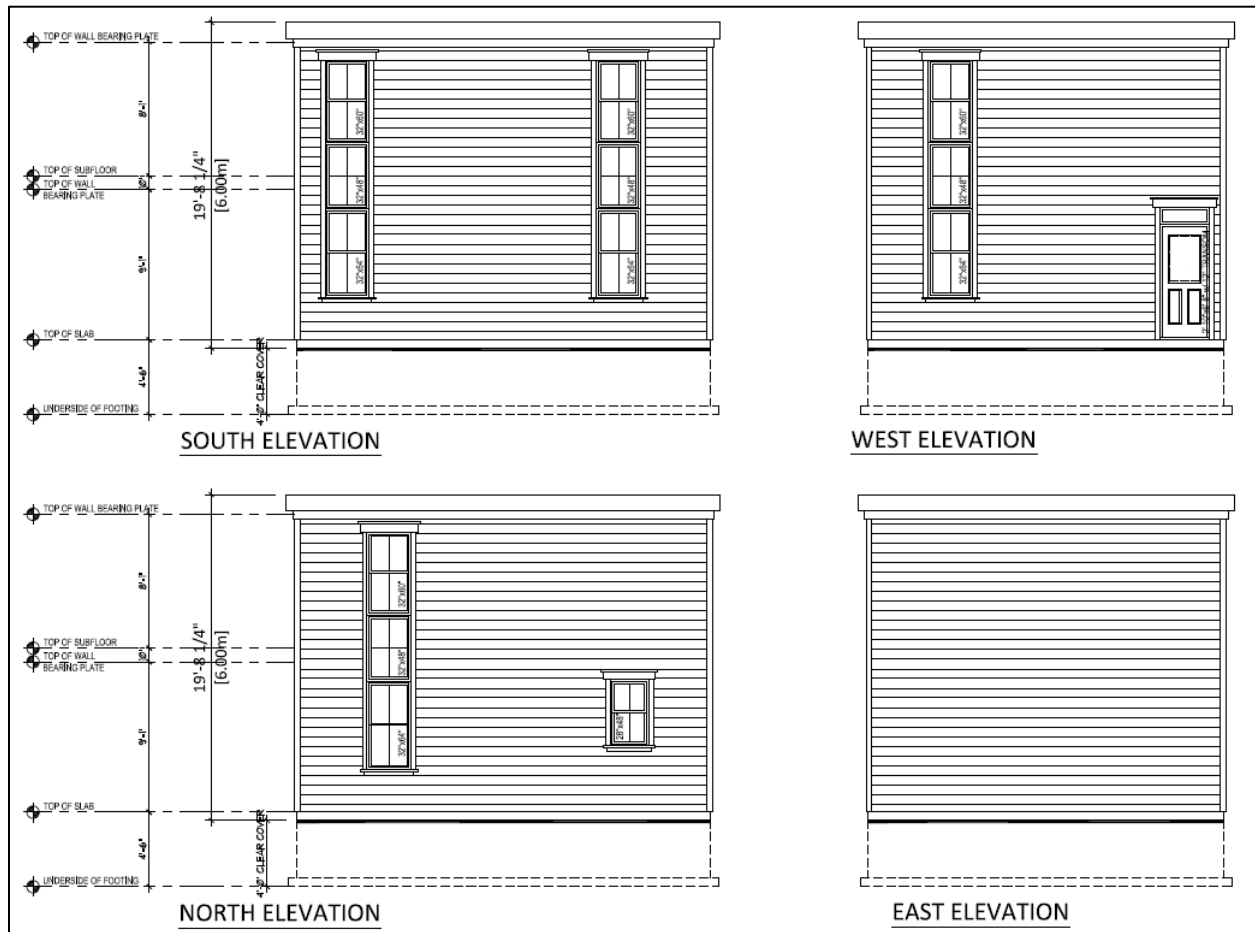


Figure 28: Elevations for the proposed accessory building



4.4 Public Realm

The public realm consists of Huron Street and Audrey Avenue streetscapes, which will be enhanced by the proposed development. The 3-storey back-to-back townhouse block that is proposed in the southerly portion of the subject lands will be positioned close to Huron Street and the 3-storey back-to-back townhouse block proposed in the northerly portion will be positioned close to Audrey Avenue. The units facing the public roads will provide pedestrian access from the public sidewalk, contributing to a strong street presence.

Pedestrian-supportive features, including new sidewalks, will be introduced throughout the site to separate the private and public realms. Landscaping features will be incorporated along Huron Street and Audrey Avenue to enhance the pedestrian realm and contribute to the overall visual appearance of the subject lands.

Overall, the public realm in the vicinity of the subject lands will be defined, enhanced, and made extremely pedestrian-oriented as a result of the proposed development.

5.0 PROPOSED ZONING BY-LAW AMENDMENT

The subject lands are zoned “*Residential 1 (R1-5(3)) Zone*” in the City of London Zoning By-law No. Z.-1. As townhouse dwellings are not permitted under the current “*Residential (R1-5(3)) Zone*”, a Zoning By-law Amendment will be required to permit the proposed use, together with a site-specific regulation.

A Zoning By-law Amendment is proposed to rezone the subject lands to a site-specific “*Residential 6 (R6-5(_)) Zone*” permitting cluster townhouses. The following special provisions are required:

- A minimum front & exterior yard setback of 4.5m, whereas the minimum required is 6.0m;
- A minimum interior side yard setback of 1.4m, whereas a minimum required is 6.0m;
- A maximum density of 82 UPH, whereas the maximum permitted is 35 UPH;
- To provide 5 bedrooms per dwelling unit, whereas 3 bedrooms per dwelling unit is the maximum permitted.

6.0 CURRENT POLICY AND REGULATORY FRAMEWORK

The following sections of this report provide an analysis of the proposed development and Zoning By-law Amendment application with respect to applicable policy and regulatory documents, including the Provincial Policy Statement (2020), The London Plan (2016), and the City of London Zoning By-law (Z.-1).

6.1 Provincial Policy Statement, 2020

The 2020 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 development, cost-efficient development and protection of natural resources.

All planning applications, including Zoning By-law Amendment applications, are required to be consistent with the PPS policies. Table 1 provides a summary of the relevant PPS policies and a policy analysis detailing how the proposed development is consistent with the applicable PPS policies.

Table 1: 2020 PPS Policy Analysis

<i>Policy</i>	<i>Analysis/Response</i>
<p><u>Section 1.1.1.a</u> Healthy, liveable and safe communities are sustained by promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term.</p> <p><u>Section 1.1.1.b</u> Healthy, liveable and safe communities are sustained by 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> <p><u>Section 1.1.1.c</u> Healthy, liveable and safe communities are sustained by avoiding development and land use patterns which may cause environmental or public health and safety concerns.</p> <p><u>Section 1.1.3.4</u> 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 proposed cluster townhouses will efficiently utilize the subject lands and existing municipal services and provide residential intensification in a compact built form, helping meet the short and long-term housing needs of current and future residents, without causing environmental or public health concerns.</p>
<p><u>Section 1.1.1.e</u> 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><u>Section 1.1.3.2.a</u> Land use patterns within settlement areas shall be based on densities and a mix of land uses which efficiently use land and resources.</p> <p><u>Section 1.1.3.2.b</u> Land use patterns within settlement areas shall be based on densities and a mix of land uses which</p>	<p>The proposed development represents an efficient use of land, infrastructure, and public service facilities. The subject lands have access to public transportation (Bus Routes #6, 13 and 102) and are within walking distance of the main campus of Western University, the main campus</p>

<p>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.</p> <p style="text-align: center;"><u>Section 1.1.3.2.e</u></p> <p>Land use patterns within settlement areas shall be based on densities and a mix of land uses which support active transportation.</p> <p style="text-align: center;"><u>Section 1.1.3.2.f</u></p> <p>Land use patterns within settlement areas shall be based on densities and a mix of land uses which are transit-supportive, where transit is planned, exists or may be developed.</p> <p style="text-align: center;"><u>Section 1.1.3.3</u></p> <p>Planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.</p>	<p>of King’s University College, and convenience retails along Richmond Street, supporting active and public transportation and making efficient use of the existing infrastructure and transportation networks.</p>
<p style="text-align: center;"><u>Section 1.1.3.1</u></p> <p>Settlement areas shall be the focus of growth and development.</p> <p style="text-align: center;"><u>Section 1.1.3.6</u></p> <p>New development taking place in designated growth areas should occur adjacent to the existing built-up area and should have a compact form, mix of uses and densities that allow for the efficient use of land, infrastructure and public service facilities.</p>	<p>The subject lands are within the built-up area in the City of London, which are the focus areas of urban growth and development. The proposed density is reflective of a compact, efficient form of housing which adds to the mix of uses and densities in the surrounding area.</p>
<p style="text-align: center;"><u>Section 1.4.3.b</u></p> <p>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 permitting and facilitating 1. all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and 2. all types of</p>	<p>The proposed cluster townhouses are sufficiently sized to accommodate all the requisite components for residential development, including sufficient</p>

residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3.	building setbacks, parking, amenity space, and appropriate vehicular and pedestrian circulation.
<p style="text-align: center;"><u>Section 1.6.6.2</u></p> Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services.	<p style="text-align: center;">The cluster townhouses are proposed to be serviced by existing public servicing, thereby promoting an efficient and cost-effective development.</p>
<p style="text-align: center;"><u>Section 1.6.7</u></p> Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.	<p style="text-align: center;">The proposed development will provide intensification at a location where public transportation exists, making efficient use of the transit system.</p>

Given the above, it is our professional opinion that the proposed development is consistent with the applicable policies of the 2020 PPS.

6.2 The London Plan, 2016

The London Plan ('TLP') provides a policy framework which encourages the development of vibrant, healthy, safe and fulfilling neighbourhoods, attractive mobility alternatives, and affordable housing for those in need.

The subject lands are designated "*Neighbourhoods*" Place Type as identified in Map 1 – Place Types of TLP (Figure 29), and are located within the "*Near Campus Neighbourhood*" as shown in Map 7 – Specific Policy Areas of TLP and within the "*Primary Transit Area*" as identified in Figure 3 – Primary Transit Area of TLP.

The "*Neighbourhoods*" Place Type designation contemplates a wide range of dwelling types to provide a full range of residential uses, including townhouses, stacked townhouses, and low-rise apartments.

Figure 29: The London Plan – Map 1 Place Types (Excerpt)

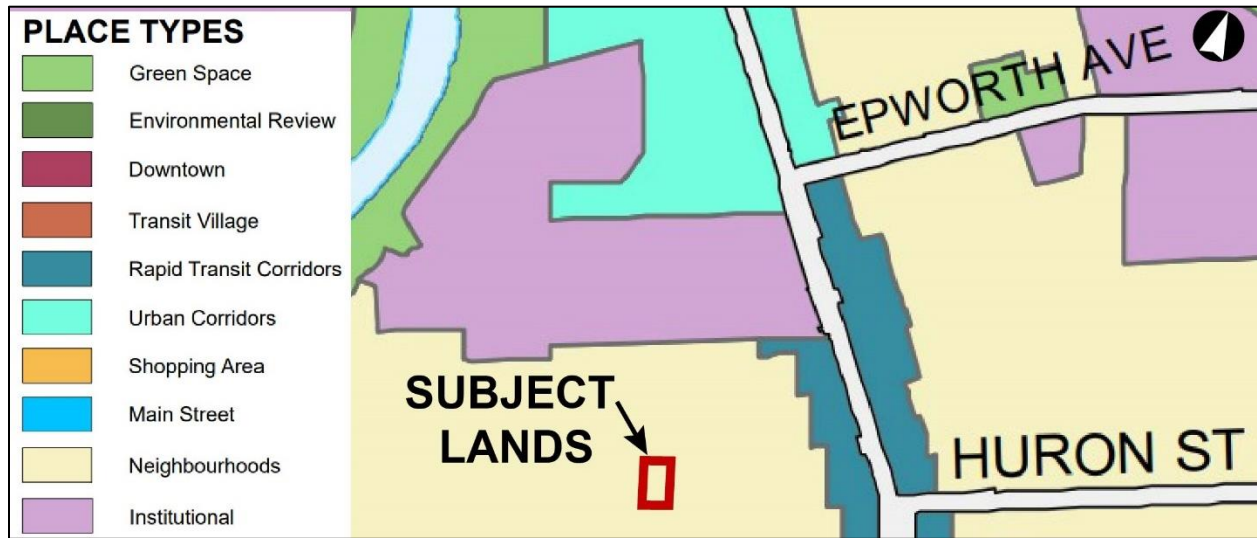


Table 2 provides a policy analysis detailing how the proposed development on the subject lands is consistent with the applicable policies of TLP.

Table 2: The London Plan Policy Analysis

<i>Policy</i>	<i>Response</i>
<p><u>Policy 80.4 & 6</u> Residential intensification will play a large role in achieving our goals for growing “inward and upward”. Intensification will be supported, subject to the policies of this Plan, in the following forms: 4. Infill development of vacant and underutilized lots; 6. Redevelopment, at a higher than existing density, on developed lands.</p> <p><u>Policy 84</u> Intensification may occur in all of the Place Types that allow for residential uses.</p>	<p>The proposed development provides redevelopment and intensification of underutilized lands located within the built-up area, reducing the need to grow outward.</p>
<p><u>Policy 90</u> The Primary Transit Area will be a focus of residential intensification and transit investment within London. It includes the Transit Villages and the Rapid Transit Corridors. The nature and scale of intensification will vary depending on the Place Type within the Primary Transit Area and will be a good fit within existing neighbourhoods. The Primary Transit Area will also have a heightened level of pedestrian and cycling infrastructure to</p>	<p>The subject lands are located within the Primary Transit Area, which is the desired location for residential growth. The proposed cluster townhouses are a permitted use within the “Neighbourhoods” Place Type and are located within an area with strong connections to existing transportation and pedestrian networks and public transportation.</p>

<p>service and support active mobility and strong connections within these urban neighbourhoods.</p> <p style="text-align: center;"><u>Policy 91</u></p> <p>Directing infill and intensification to this area is a major part of this Plan's strategy to manage growth in the city as a whole and to target 45% of all future residential growth in the Built-Area Boundary.</p> <p style="text-align: center;"><u>Policy 92 3</u></p> <p>To promote intensification in the Primary Transit Area, it is an objective of this Plan that 75% of the intensification target will be in the Primary Transit Area.</p> <p style="text-align: center;"><u>Policy 968 3</u></p> <p>The development conforms to the Residential Intensification policies of this Plan, where those policies do not conflict with Near-Campus Neighbourhoods Policies.</p> <p style="text-align: center;"><u>Policy 968 4</u></p> <p>The development conforms to any relevant Specific Policies of this chapter.</p>	
<p style="text-align: center;"><u>Policy 154 2</u></p> <p>Through our urban regeneration efforts we will maximize the value returned on the investment made in civic infrastructure.</p>	<p>The proposed development supports a high return on investment relating to civic infrastructure, by making full use of existing utilities and municipal services.</p>
<p style="text-align: center;"><u>Policy 252</u></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 proposed cluster townhouses are sufficiently sized to accommodate all the requisite components for residential development, including adequate building setbacks, parking, amenity space, and appropriate vehicular and pedestrian circulation.</p>
<p style="text-align: center;"><u>Policy 255</u></p> <p>Site layout will promote connectivity and safe movement for pedestrians, cyclists, and motorists between, and within, sites.</p>	<p>The proposed development includes a network of sidewalks around and internal to the subject lands to provide appropriate connections to the public spaces, building entrances, parking areas, and common indoor amenity area.</p>
<p style="text-align: center;"><u>Policy 261</u></p> <p>Buildings at corner sites should be oriented towards the higher-order street classification.</p>	<p>The subject lands are located on the northeast corner of the intersection of Huron Street and Audrey Avenue. Both streets have the same street classification and the proposed townhouses are oriented towards both streets.</p>
<p style="text-align: center;"><u>Policy 269</u></p> <p>Buildings should be sited to minimize the visual exposure of parking areas to the street.</p> <p style="text-align: center;"><u>Policy 270</u></p> <p>The location, configuration, and size of parking areas will be designed to support the planned</p>	<p>Parking areas are provided in the rear yard and the central area of the subject lands, between the cluster townhouse blocks, supporting pedestrian-friendly parking areas and minimizing visual exposure to the street. The configuration and size of the parking areas accommodate 15 parking</p>

<p>vision of the place type and enhance the experience of pedestrians, transit-users, cyclists, and drivers.</p>	<p>spaces, whereas a total of 14 parking spaces are the minimum required.</p>
<p><u>Policy 965 2</u> Identify strategic locations where residential intensification is appropriate within Near-Campus Neighbourhoods and zone these opportunities accordingly; use strong transit connections to link these residential intensification opportunities to campuses.</p> <p><u>Policy 965 8</u> Direct residential intensification to significant transportation nodes and corridors and away from the interior of neighbourhoods.</p>	<p>The subject lands are located approximately 155m west of Richmond Street, which is a Rapid Transit Corridor that is intended to connect the Downtown to neighbourhoods, institutions and other employment nodes, centres of culture and commerce, and our urban areas. Furthermore, the subject lands are located within walking distance of the main campus of Western University and the main campus of King’s University College, being a strategic location for residential intensification.</p>
<p><u>Policy 286</u> Buildings should be designed to achieve human-scale relationships that are comfortable for pedestrians.</p> <p><u>Policy 965 4</u> Encourage appropriate forms of intensification that support the vision for Near-Campus Neighbourhoods and discourage forms of intensification that may undermine the long-term vision for Near-Campus Neighbourhoods.</p> <p><u>Policy 968 1</u> The proposed development is in conformity with the vision and planning goals for Near-Campus Neighbourhoods.</p>	<p>The proposed development is designed to contribute to a sense of place and quality of housing options by providing an interface along the public spaces with dwellings designed to address the street and achieve human-scale relationships.</p>
<p><u>Policy 965 6</u> Encourage a balanced mix of residential structure types at the appropriate locations while preserving stable residential areas.</p> <p><u>Policy 965 7</u> Encourage residential intensification in mid-rise and high-rise forms of development and discourage a concentration of residential intensification and residential intensity in low-rise forms of housing.</p> <p><u>Policy 154 8</u> Through our urban regeneration efforts we will facilitate intensification within our urban neighbourhoods, where it is deemed to be appropriate and in a form that fits well within the existing neighbourhood.</p>	<p>The proposed cluster townhouses represent an appropriate and complementary form of housing to the surrounding low-density residential neighbourhood, increasing the range of housing units available in a location that can support medium-density development.</p>

<p><u>Policy 965 10</u> Ensure that residential intensification projects incorporate urban design qualities that enhance streetscapes, complement adjacent properties, and contribute to the character and functional and aesthetic quality of the neighbourhood.</p>	<p>The exterior façade of the cluster townhouses will mostly be wood cladding, respecting the character of the neighbourhood.</p>
<p><u>Policy 968 2</u> The proposed development is consistent with Tables 10 to 12 in the Neighbourhoods Place Type.</p>	<p>The proposed 3-storey cluster townhouses are consistent with permitted uses and heights identified in Tables 10 and 11.</p>
<p><u>Policy 968 5</u> The development provides for an adequate amenity area that is appropriately shaped, configured, and located.</p>	<p>The proposed development provides an appropriately sized indoor amenity area located in the rear yard of the subject lands.</p>
<p><u>Policy 968 6</u> Mitigation measures are incorporated into the proposed building(s) and site design which ensure that the amenity of surrounding residential land uses is not negatively impacted.</p>	<p>The northerly and easterly portions of the proposed development abut low-density residential uses. The proposed rear yard setback of 4.5m and the proposed 1.4m interior side yard setback are existing conditions and there have not been any impacts on surrounding residential uses. We do not anticipate any new or unanticipated impacts as a result of the proposed intensification.</p>
<p><u>Policy 968 8</u> The proposal establishes a positive and appropriate example for similar locations within the Near-Campus Neighbourhoods areas.</p>	<p>The proposed cluster townhouses are a positive addition to the well-established neighbourhood, supporting a mix of housing types in an appropriate built form and adding a much-needed housing supply to the neighbourhood.</p>

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

The subject lands are currently zoned “Residential 1 (R1-5(3)) Zone” in the City of London Zoning By-law No. Z.-1 (Figure 30). The R1 Zone is the most restrictive residential zone and permits only single-detached dwellings. A Zoning By-law Amendment is required to rezone the subject lands to “Residential 6 (R6-5(_)) Zone” to permit cluster townhouses with site-specific provisions to capture the extent of the proposed redevelopment.

Figure 30: City of London Zoning By-law (Source: Interactive Zoning Map)

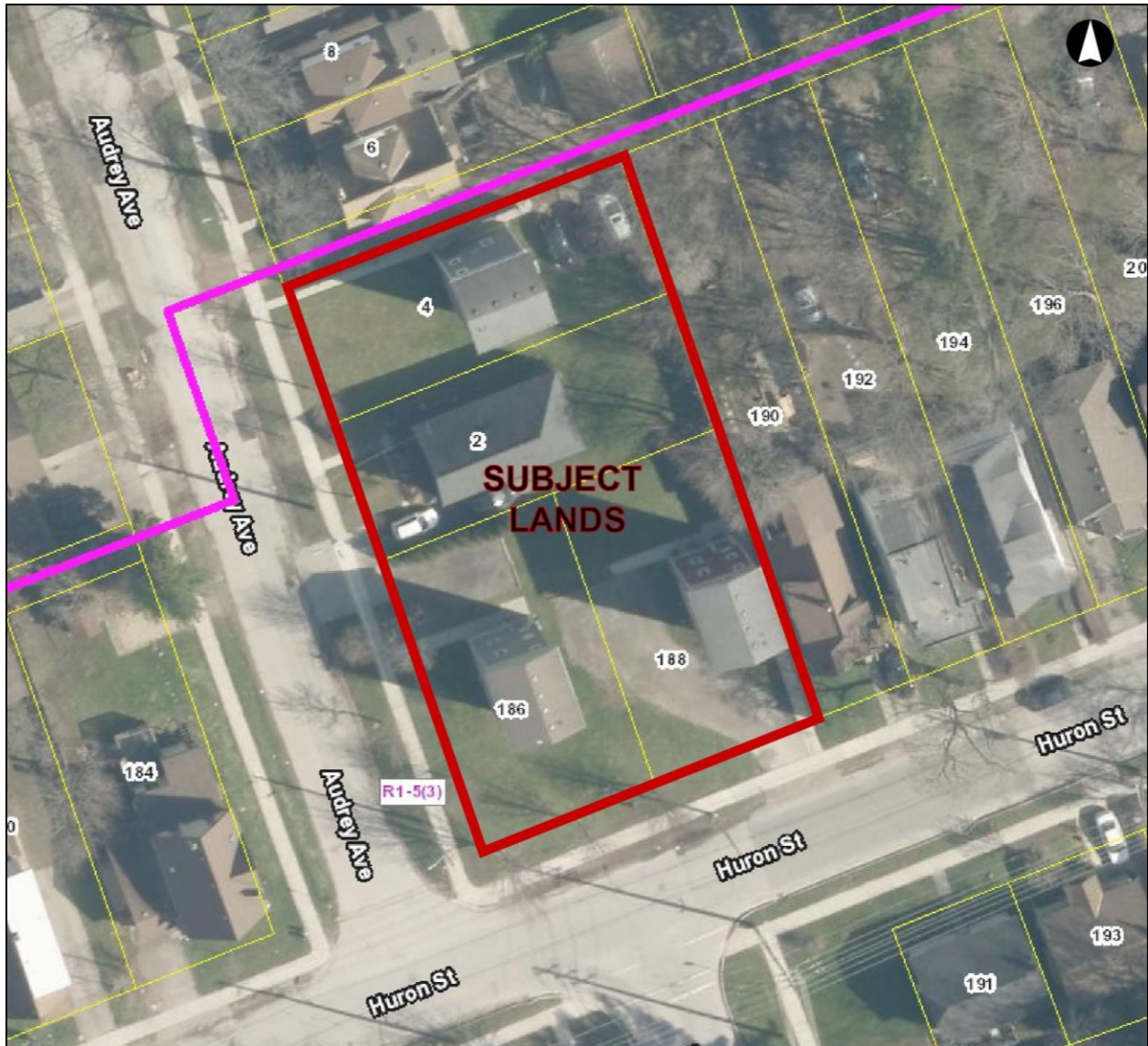


Table 3 provides a comparison of the applicable zoning regulations for the “Residential 6 (R6-5(_)) Zone” with the proposed regulations for the subject lands.

Table 3: Site Statistics

	<i>Required R6 5 Zone</i>	<i>Proposed R6 5() Zone</i>
Permitted Use	Cluster Housing	Cluster Townhouses
Lot Area	850.0 m ²	1714.0 m ²
Lot Frontage	10.0 m	31.7 m
Lot Depth	N/A	53.9m
Front Yard	6.0 m	*4.5 m
Exterior Side Yard	6.0 m	*4.5 m
Rear Yard Setback	6.0 m	*1.4 m
Interior Side Yard (N)	7.5 m	*1.4 m
Landscape Open Space	30%	35%
Lot Coverage	45%	38%
Height	12.0 m	10.3 m
Density	35 UPH	*82 UPH
Number of Bedrooms	3 per dwelling unit	*5 per dwelling unit
Lot Coverage (Accessory Building)	10%	3%
Height (Accessory Building)	6.0 m	6.0m
Interior Side Yard Setback (E) (Accessory Building)	0.6 m	0.6 m
Parking Spaces	1 parking per unit = 14	14
Accessible Parking Spaces	4% of total provide parking spaces = 1 Type A	1
Bicycle Parking	0.1 per unit = 2 short-term bicycle parking spaces	2
Driveway width	6.0m	6.5m

*Denotes special zoning regulation

The proposed specific regulations are discussed below:

Front yard and Exterior Side Yard Setback

The proposed development results in a reduced front yard and exterior side yard setbacks of 4.5m, whereas 6.0m is the minimum required for both yards. The intent of the front yard and exterior side yard setbacks is to provide adequate spatial separation from the street to the dwelling and maintain the street's character by providing similar setbacks between existing and proposed residential buildings oriented to the same street. It is important to note that several residential lots along Huron Street present reduced front yard and exterior side yard setbacks, demonstrating that the proposed 4.5m front yard keeps with the character of the area. As such, the proposed reduced front yard and exterior side yard setbacks of 4.5m ensure a generally consistent street wall and maintain the streetscape character.

Furthermore, the proposed reduced front yard and exterior side yard setbacks will enhance the public realm by providing minimal front yard and exterior side yard setbacks of 4.5m, contributing to a strong street presence.

Rear Yard Setback

The proposed development results in a reduced rear yard setback of 1.4m, whereas the minimum required is 6.0m. It is important to note that the proposed rear yard setback of 4.5m is an existing condition, but because additions to the existing single-detached dwellings are being proposed on the subject lands, this requirement is to recognize an already deficient rear yard setback. Also, there have not been any impacts on surrounding residential uses and it is not anticipated any new or unanticipated impacts as a result of the proposed intensification.

Interior Side Yard Setback

The proposed development results in a reduced northerly side yard setback of 1.4m, whereas the minimum required is 7.5m. The intent of the interior side yard setback regulation in the R6-5 Zone is to provide adequate spatial separation and reduce the impacts of privacy on abutting properties. It is important to note that the existing residential dwelling on the northerly portion of the subject lands has already a deficient side yard setback. There have not been any impacts on adjacent residential uses and it is not anticipated any new or unanticipated impacts as a result of the proposed intensification.

Furthermore, there is a laneway between the abutting residential dwelling and the subject lands, resulting in a minimum interface between the proposed development and the neighbouring residential property. Given that, the functionary intent of the R6-5 Zone is maintained and the reduced northerly side yard of 1.4m is to recognize an existing condition.

Density

The proposed development results in a density of 82 UPH, whereas 35 UPH is the maximum under the “R6-5 Zone”. This report demonstrates that the subject lands can support medium-density development and are an appropriate location for the increased residential density as they are located in proximity to the Rapid Transit Corridor and within walking distance of commercial and institutional uses and open spaces.

Furthermore, the proposed development will increase the range of housing units available in the neighbourhood, helping meet the short and long-term housing needs of current and future residents and aiding in housing affordability. Overall, the proposed development effectively leverages the proposed density to meet the intent and objectives of the Official Plan of redeveloping lands at a higher than existing density and making a positive addition to the neighbourhood.

Number of Bedrooms

The cluster townhouses are proposed to have a total of five (5) bedrooms per unit, whereas a maximum of three (3) bedrooms are currently permitted. Importantly, the Municipal Council approved amendments to The London Plan and the Zoning By-law No. Z.-1, on the recommendation of the Director, Planning and Development, at a meeting held on February 13, 2024, including an amendment to the bedroom limit within “*Near Campus Neighbourhoods*” from

three (3) to five (5). Even though the above-mentioned Official Plan Amendment and Zoning By-law Amendment are under appeal, it is acknowledged that Staff and Municipal Council are generally in favour of increasing the number of bedrooms to increase the supply of housing with a focus on achieving intensification targets and increase access to a range of quality, affordable, and supportive housing options that meet the City's needs.

The proposed 5-bedroom per residential unit on the subject lands supports the vision and goal for residential intensification within "Near Campus Neighbourhoods", resulting in an appropriate intensification that conforms with The London Plan policies and supports housing supply and affordability.

7.0 SUPPORTING SUBMISSION MATERIALS

The supporting submission materials were prepared in accordance with the submission requirements identified in the Records of Pre-Application Consultation dated April 17, 2024. It is acknowledged that further supporting materials will be required through the Site Plan Approval application.

Tree Preservation Plan

The Tree Preservation Plan has been deferred to the SPA stage.

Sanitary Brief

A Sanitary Brief was completed by Strik, Baldinelli, Moniz Ltd. (SBM) on June 06, 2024, to outline the anticipated peak flow and intended population count. A site's occupancy load of 70 people (14 units at 5.0 people/ unit) was considered to determine the proposed flows for the subject lands and a total peak sanitary flow was estimated to be 0.895 L/s for the proposed development.

8.0 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 joint public meeting be held for the purpose of giving the public an opportunity to make representations in respect of the proposed development; and,

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.

9.0 CONCLUSIONS

The proposed Zoning By-law Amendment seeks to permit a proposed back-to-back townhouse development on the subject lands. Based on the findings of this report and the supporting materials, the subject lands represent an appropriate opportunity for intensification.

The proposed application is consistent with the 2020 Provincial Policy Statement and conforms with The London Plan. The Zoning By-law Amendment will facilitate the proposed intensification consisting of cluster townhouses, which are not permitted under the current zoning. Furthermore, the proposed development generally complies with the City of London Zoning By-law Z.-1 regulations for the “*Residential 6 (R6-5(_)) Zone*” with some site-specific provisions required.

The form, scale and massing of the proposed cluster townhouses are appropriate for the subject lands, resulting in a positive addition to the neighbourhood and responding to core housing needs in the City of London. The proposed compact form of development is encouraged in The London Plan and the dwelling units may be priced competitively in the housing market, supporting housing affordability. Furthermore, the subject lands are strategically located in the neighbourhood with strong transit connections, within walking distance to a Rapid Transit Corridor, commercial and institutional uses, and open spaces.

Based on the above, and as detailed throughout this report, the proposed application is consistent with the intent and policies as set forth in provincial and municipal planning legislation. As such, the proposed amendment is considered appropriate and represents good land use planning.