

PLANNING JUSTIFICATION REPORT

Palumbo Homes

279 Sarnia Road
London, ON



July 17, 2024



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1.0 INTRODUCTION

This Planning Justification Report has been prepared on behalf of Palumbo Homes in support of an application for a Zoning By-law Amendment to permit a proposed 3-storey back-to-back townhouse development, located at 279 Sarnia Road, London (hereinafter referred to as the “subject lands”).

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;
- The proposed development meets the intent and purpose of the “*Neighbourhoods*” Place Type policies, and all other relevant 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 existing public transportation, 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 a rectangular-shaped parcel, located on the north side of Sarnia Road, approximately 500m west of the intersection of Sarnia Road and Western Road. The subject lands have an approximate total frontage of 32.6m (106.9ft) along Sarnia Road, and a total approximate lot area of 2,179.3m² (23,457.7ft²) (Figure 1).

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



The southern portion of the subject lands is currently occupied by a single-storey, single-detached dwelling and an accessory building while the remainder of the subject lands consists of grassed and vegetated areas. Vehicular access is provided from Sarnia Road by a driveway located along the easterly portion of the subject lands (Figure 2). The subject lands are generally flat.

Figure 2: Existing residential dwelling on the subject lands (looking north on Sarnia Road)

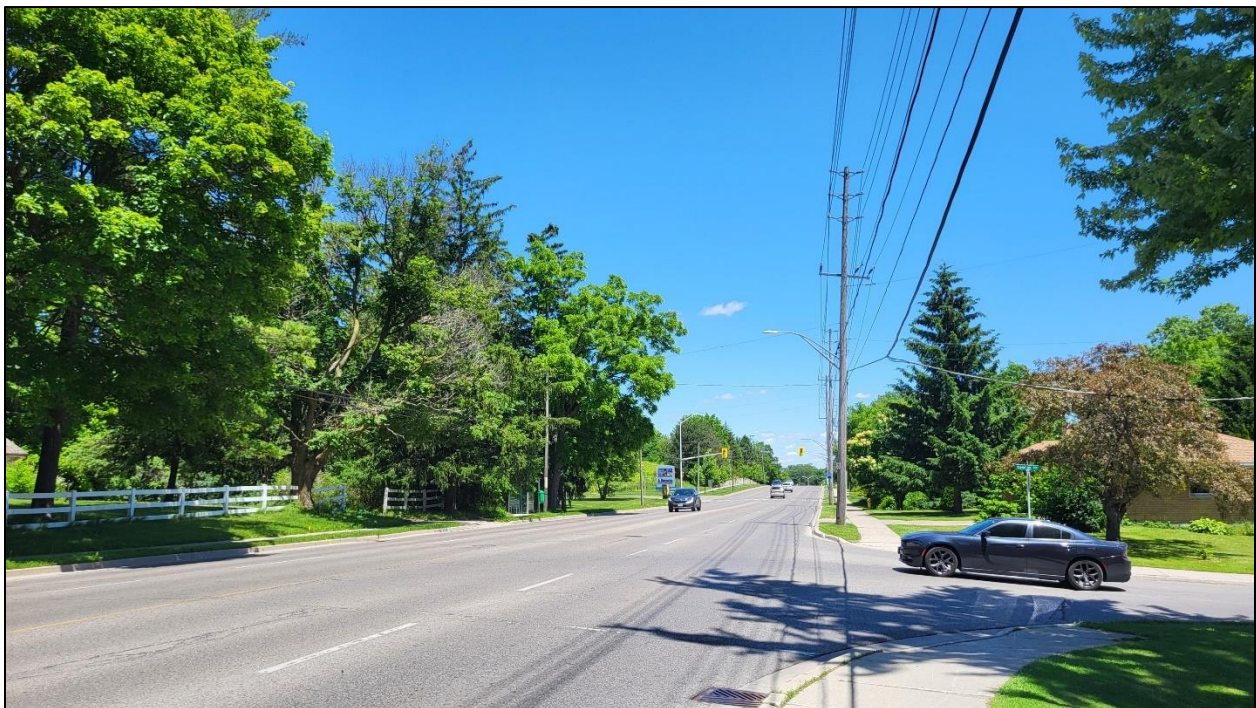


Sarnia Road is classified as a Civic Boulevard street. Public sidewalks are available on both sides of the street (Figures 3 and 4).

Figure 3: Public sidewalks on Sarnia Road - looking west



Figure 4: Public sidewalks on Sarnia Road - looking east (Subject lands to the left)



The subject lands have good access to London Transit Commission bus routes #9 (Downtown – Whitehills), #10 (Barker at Huron – Natural Science / Masonville Place), #27 (Fanshawe College – Capulet), and #31 (Alumni Hall – Hyde Park Power Centre) providing connections to Western University, Masonville Place, and Wonderland/Oxford commercial area. The closest bus stop is located on the southeast corner of the subject lands on Sarnia Road (Figure 5) and another bus stop is located on the south side of Sarnia Road, approximately 50m from the subject lands (Figure 6). In addition, the subject lands are within walking distance of Brescia University College-Western University, the main campus of Western University, and commercial uses along Western Road.

Figure 5: Bus stop located on the southeast corner of the subject lands.

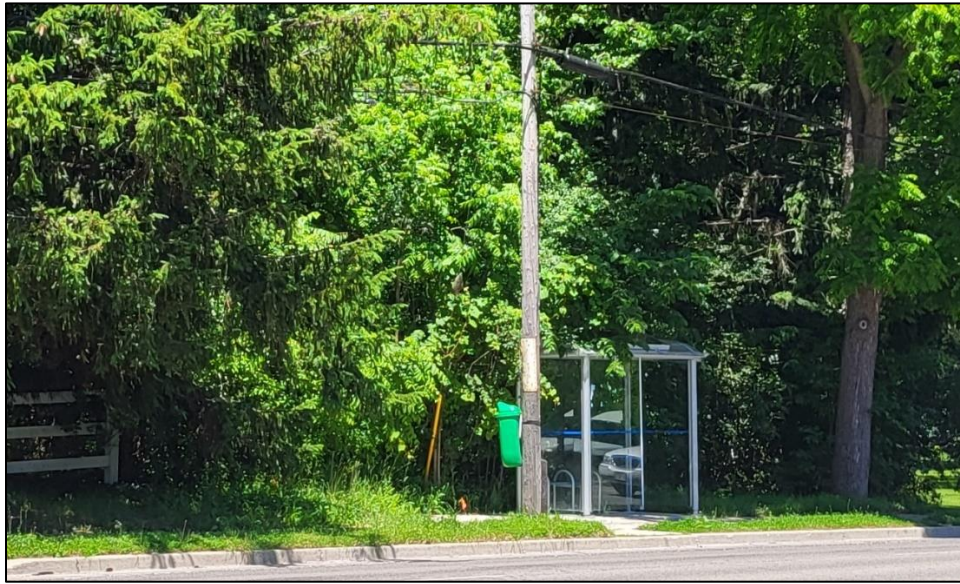
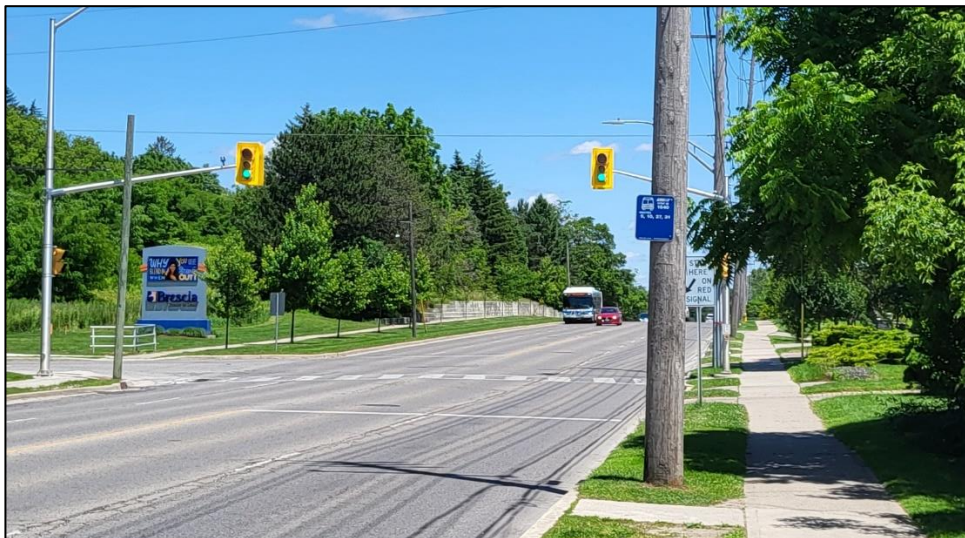


Figure 6: Bus stop located on the south side of Sarnia Road.



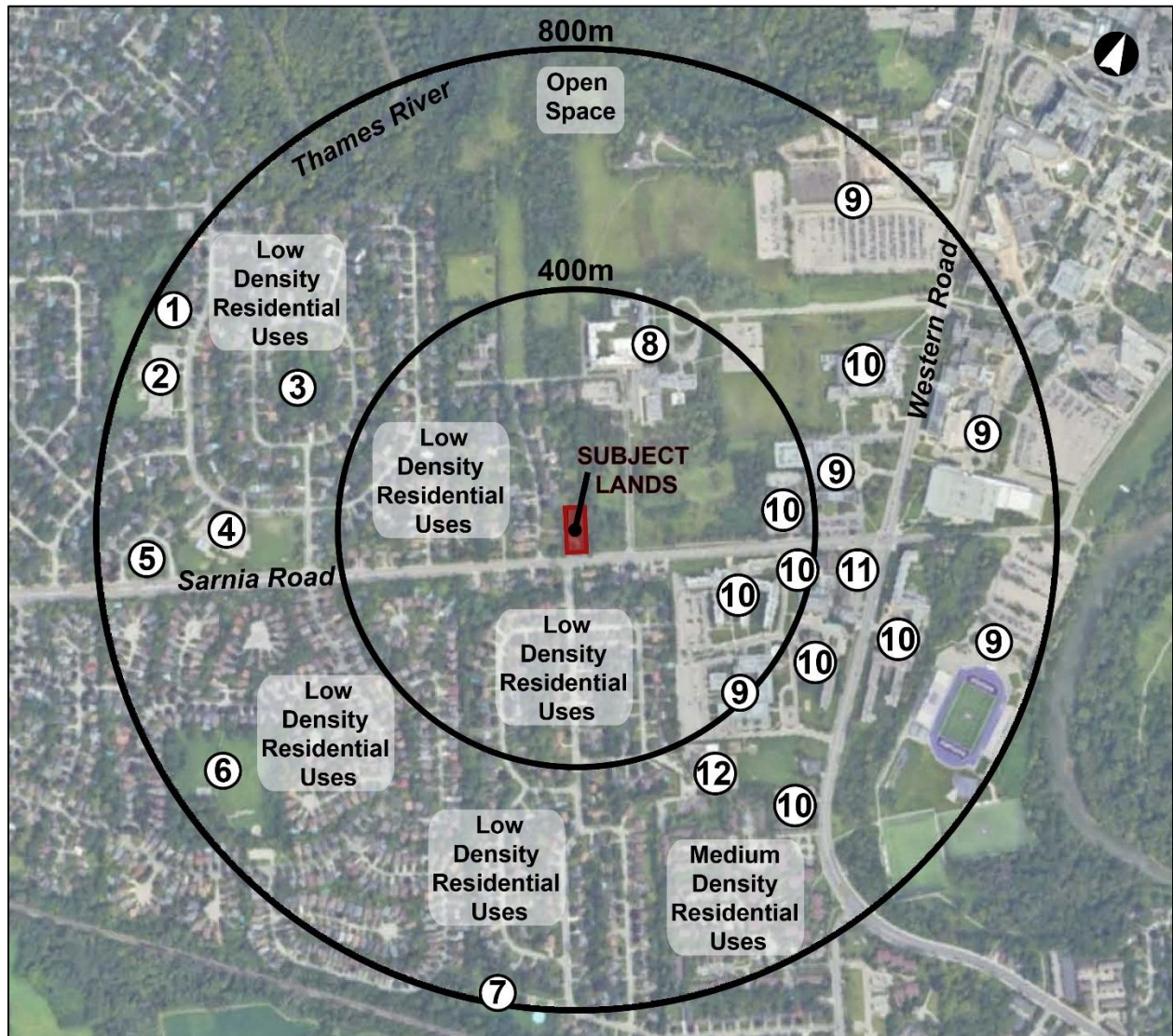
3.2 Spatial Analysis and Neighbourhood Character

Figure 7 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 7, within 400m and 800m include:

1. A. L. Furanna Park;
2. Orchard Park Public School;
3. Rollingwood Circle Park;
4. St. Thomas More Catholic School;
5. Ruskin Park;
6. Chesham Heights Park;
7. University Heights Park;
8. Brescia University College – Western University;
9. Western University Facilities;
10. Student housing;
11. Convenience commercial uses;
12. University Heights Public School.

Figure 7: 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 8 and 9). Student housing (#10 in Figure 7), in the form of apartment buildings, is located to the southeast of the surrounding area (Figures 10 and 11). The Brescia University College – Western University (#8) is located to the northeast of the surrounding area and Western University facilities (#9) are located to the southeast.

Figure 8: Single-detached dwellings on Sarnia Road



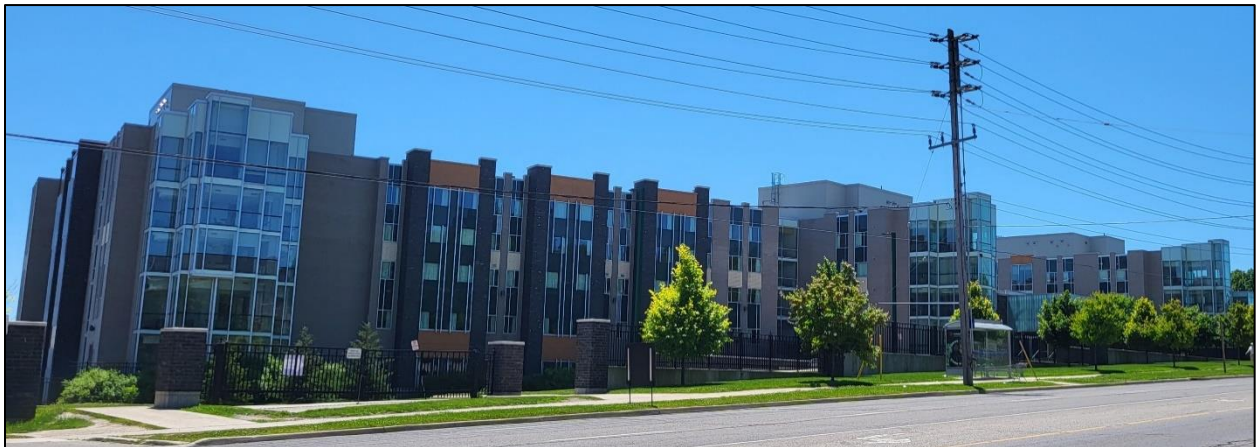
Figure 9: Single-detached dwellings on Kininvie Drive



Figure 10: Student housing on Sarnia Road



Figure 11: Student housing on Sarnia Road



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 type housing is generally located to the southeast of the surrounding area. Commercial uses, generally limited to convenience-type commercial uses, are located at the intersection of Sarnia Road and Western Road (#11). Institutional uses include Western University Campus (#9), located to the easterly portion of the surrounding area (#9); University Heights Public School located to the southeast (#12), Orchard Park Public School (#2) and St. Thomas More Catholic School (#4) located to the west. Open spaces include A. L. Furanna Park (#1); Rollingwood Circle Park (#3) and Ruskin Park (#5) located to the west and Chesham Heights Park (#6) and University Heights Park (#7) located to the southwest; and, the Thames River, which runs through the north and is surrounded by vegetated areas.

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. 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 intensification that makes efficient use of the subject lands 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;
- 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;
- Provide landscape treatments, wherever possible, to enhance the area and limit potential impacts of hardscaping on the subject lands;
- 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 subject lands are proposed to be redeveloped for two (2) blocks (Block A and Block B) of three-storey back-to-back stacked townhouses (Figure 12). Block A is proposed on the front yard, facing Sarnia Road, and Block B is proposed towards the rear yard. A total of twenty (20) dwelling units are proposed on the subject lands, resulting in a residential density of 91 units per hectare (UPH). Each residential unit is proposed to have a total of 3 bedrooms, with an average unit size of 106 m² (1150 ft²).

An appropriately sized common outdoor amenity area is proposed at grade on the northeasterly portion of the subject lands. This space is located adjacent to Block B and is connected to the internal sidewalk, making it accessible and convenient for daily use by future residents. Sufficient area for landscaping is provided within and along the perimeter of the site and a 1.8-m high wood

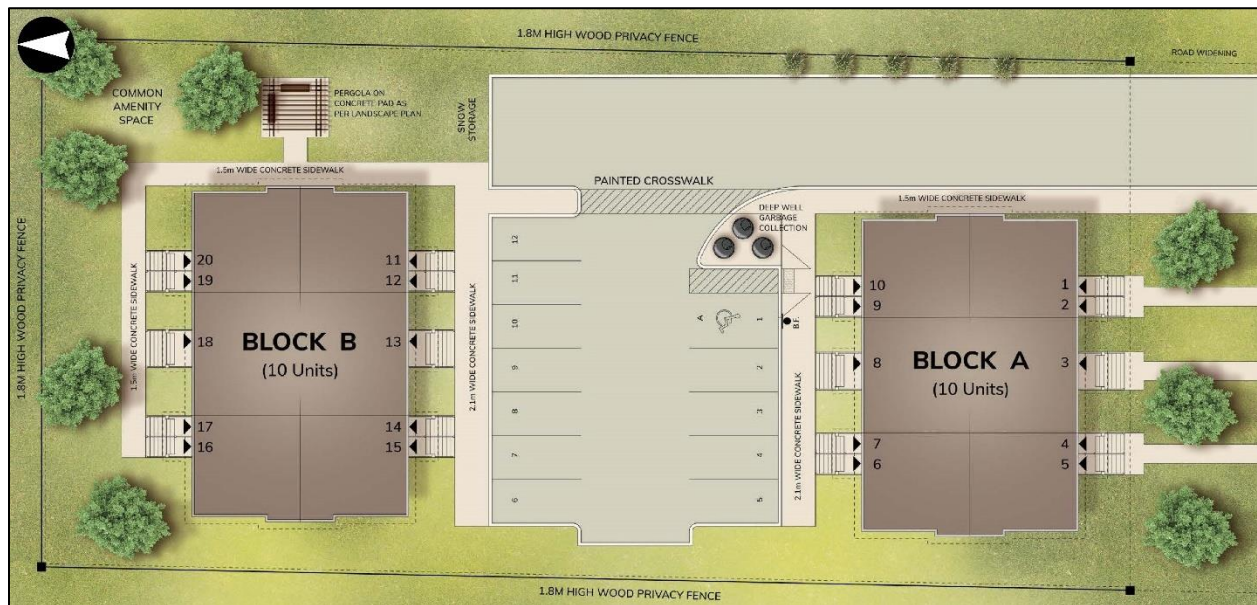
fence is proposed along the northerly, easterly and westerly lot lines to reduce privacy concerns on abutting parcels.

Pedestrian connections are provided from the public sidewalk to the proposed internal 1.5-m sidewalk, which lead to the individual entrances of dwelling units, common outdoor amenity area and parking area. A reduced front yard setback (3.2m) and direct pedestrian access from the public sidewalk are proposed for the residential units facing Sarnia Road, resulting in a strong street presence.

A new driveway (6.7m width) is proposed to provide access from Sarnia Road to the parking area. A total of 14 parking spaces are provided for the proposed redevelopment, including one Type A accessible parking space and 2 visitor parking spaces, resulting in a parking rate of 0.5 spaces per unit.

An appropriately sized snow storage area is proposed at the end of the proposed driveway and a deep well garbage storage is proposed in the central area of the subject lands to maximize waste management capacities in a minimal space.

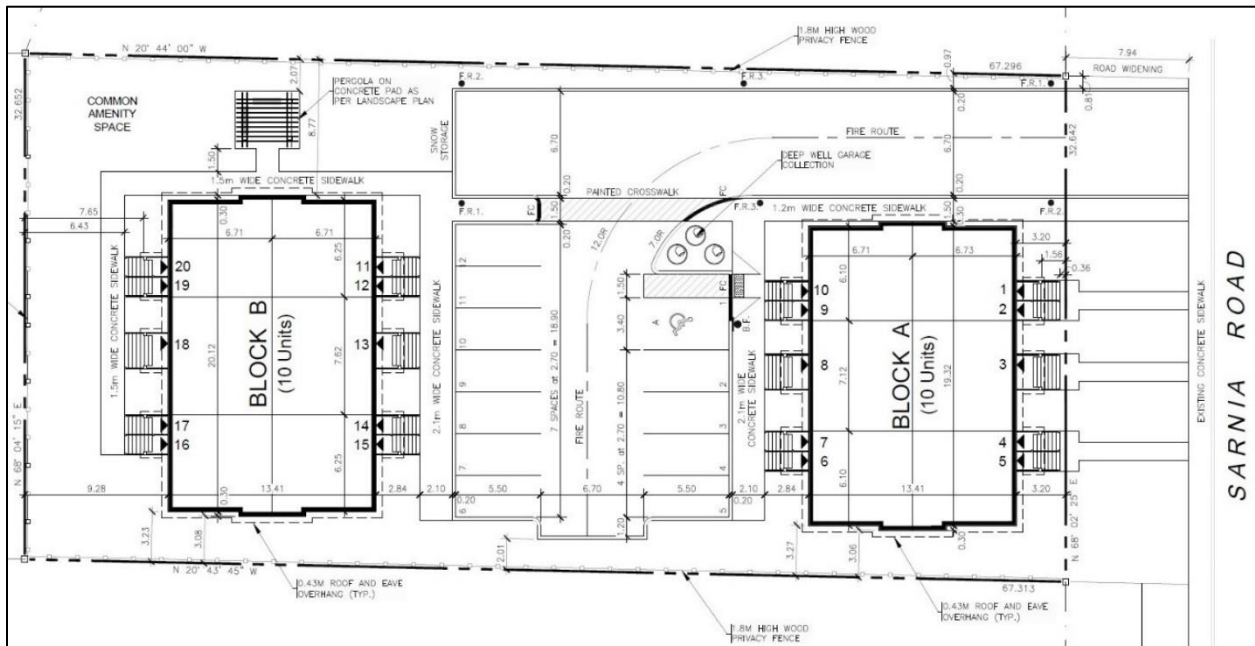
Figure 12: Coloured site plan (excerpt)



The proposed development will provide sufficient setbacks from adjacent parcels and right-of-way as detailed below (Figure 13).

- Front yard setback: 3.2m
- Rear yard setback: 9.2m
- Westerly interior side yard setback: 3.0m
- Easterly interior side yard setback: 8.7m

Figure 13: Site plan (excerpt)



4.2 Built Form, Massing and Articulation

The proposed site design will enhance the public realm by providing a minimal front yard setback (3.2m) and an active wall along the public street (Sarnia Road). Rendering views of the proposed development are presented in Figures 14 and 15.

Figure 14: Rendering of the proposed development, facing northwest from Sarnia Road



Figure 15: Rendering of the proposed development (rear view)



The proposed development will provide a high-quality modern appearance. Residential unit entrances are well-defined by porches. Projections in the façade and a diverse palate of materials will be incorporated to effectively break up visual massing while contributing to a varied appearance. The proposed form and massing are appropriate for the current and planned neighbourhood.

4.3 Architectural Treatment

The conceptual material palette for the proposed development consists of high-quality, durable materials that support a contemporary, modern appearance while balancing sustainability and functionality.

Materials and a diverse colour scheme will be used strategically to reinforce massing and articulation, provide visual interest, and define entrances and openings. Architectural detailing will be used to emphasize openings and contribute to a desirable external appearance. Fenestration is provided at regular intervals, supporting a defined rhythm of solid-void that supports order and cohesion on all facades, contributing to a street-oriented function and appearance.

Conceptual elevations are shown in Figures 16-19. Detailed building elevations will be refined in coordination with City staff as part of future Site Plan Approval and Building Permit applications.

Figure 16: Front and right-side elevations for the proposed Block A

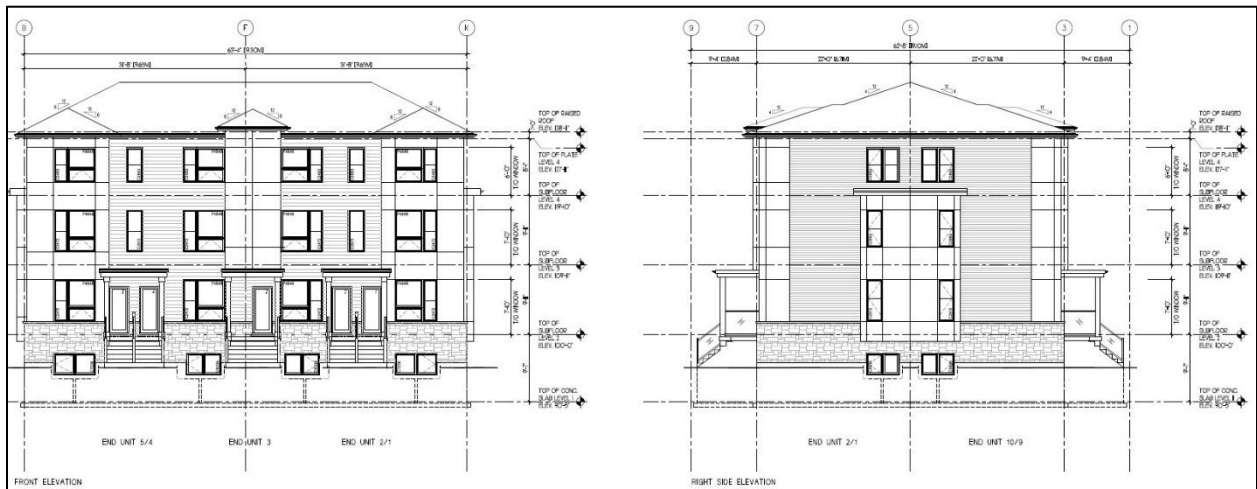


Figure 17: Rear and left-side elevations for the proposed Block A

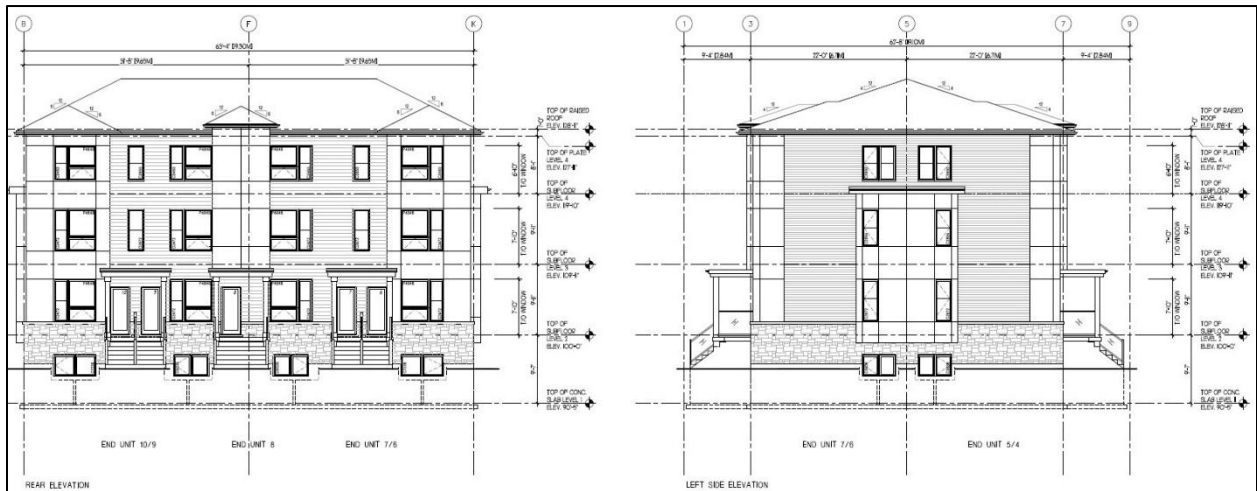


Figure 18: Front and right-side elevations for the proposed Block B

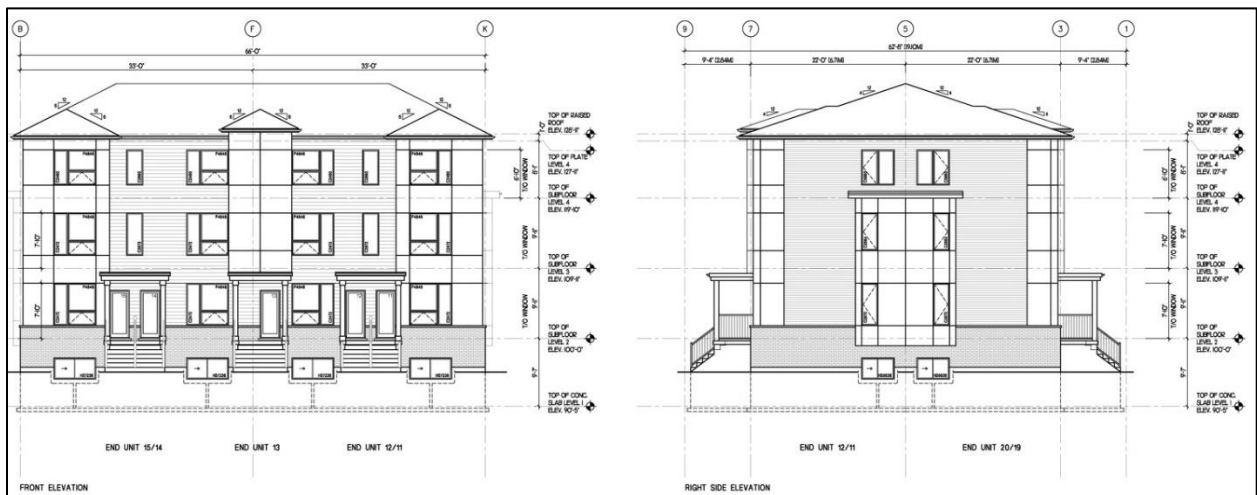
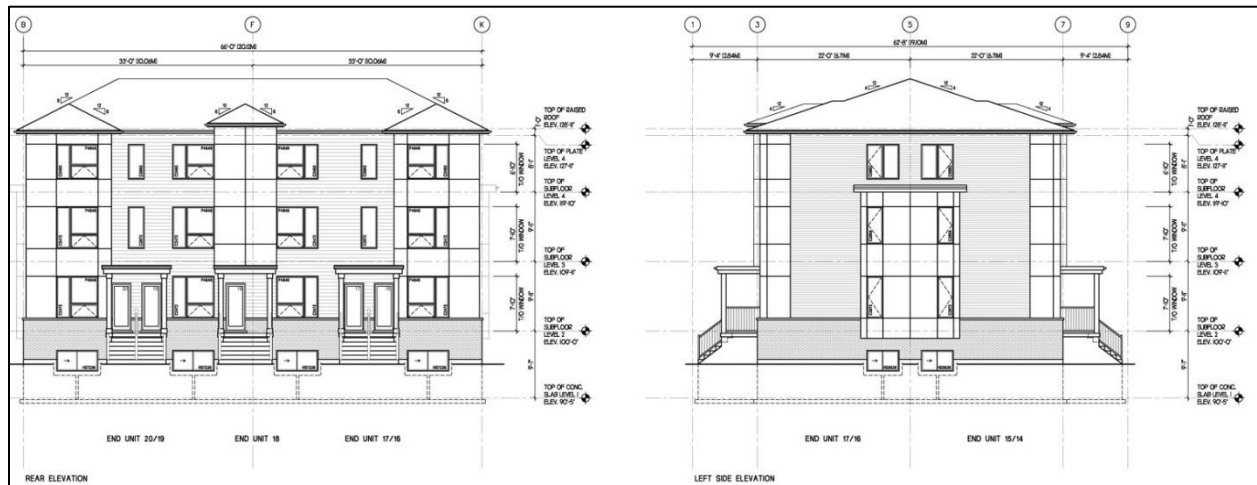


Figure 19: Rear and left-side elevations for the proposed Block B



4.4 Public Realm

The public realm consists of the Sarnia Road streetscape, which will be enhanced by the proposed development through high-quality building design and pedestrian-friendly elements. Block A of the proposed 3-storey back-to-back townhouse will be positioned close to Sarnia Road and the residential units facing the public road will provide direct 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 the front yard 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 (R1-10) Zone*” in the City of London Zoning By-law No. Z.-1. As townhouse dwellings are not permitted under the current “*R1-10 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 (R8-4(_)) Zone*” to permit stacked townhouses. The following special provisions are required:

- A minimum front yard setback of 3.2m, whereas a minimum of 7.0m is required;
- A minimum westerly interior side yard setback of 3.0m, whereas a minimum of 4.8m is required;
- A maximum density of 91 UPH, whereas a maximum of 75 UPH is 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 stacked 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 #9, 10, 27 and 31) and are within walking distance of the main campus of Western University, the Brescia University College-Western University, and</p>

<i>Policy</i>	<i>Analysis/Response</i>
<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>convenience retails along Western Road, 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 is the focus area 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</p>	<p>The proposed stacked townhouses will contribute to the supply and mix of housing options available to future residents in the area, and are sufficiently sized to accommodate all the requisite components for residential development,</p>

<i>Policy</i>	<i>Analysis/Response</i>
employment opportunities; and 2. all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3.	including sufficient rear yard setback, easterly side yard setback, lot coverage, landscaped area, 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 stacked 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 and associated Zoning By-law Amendment are 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 20), and are located along a Civic Boulevard Street Classification (Figure 21). The subject lands are also 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 20: The London Plan – Map 3 Street Classifications (Excerpt)

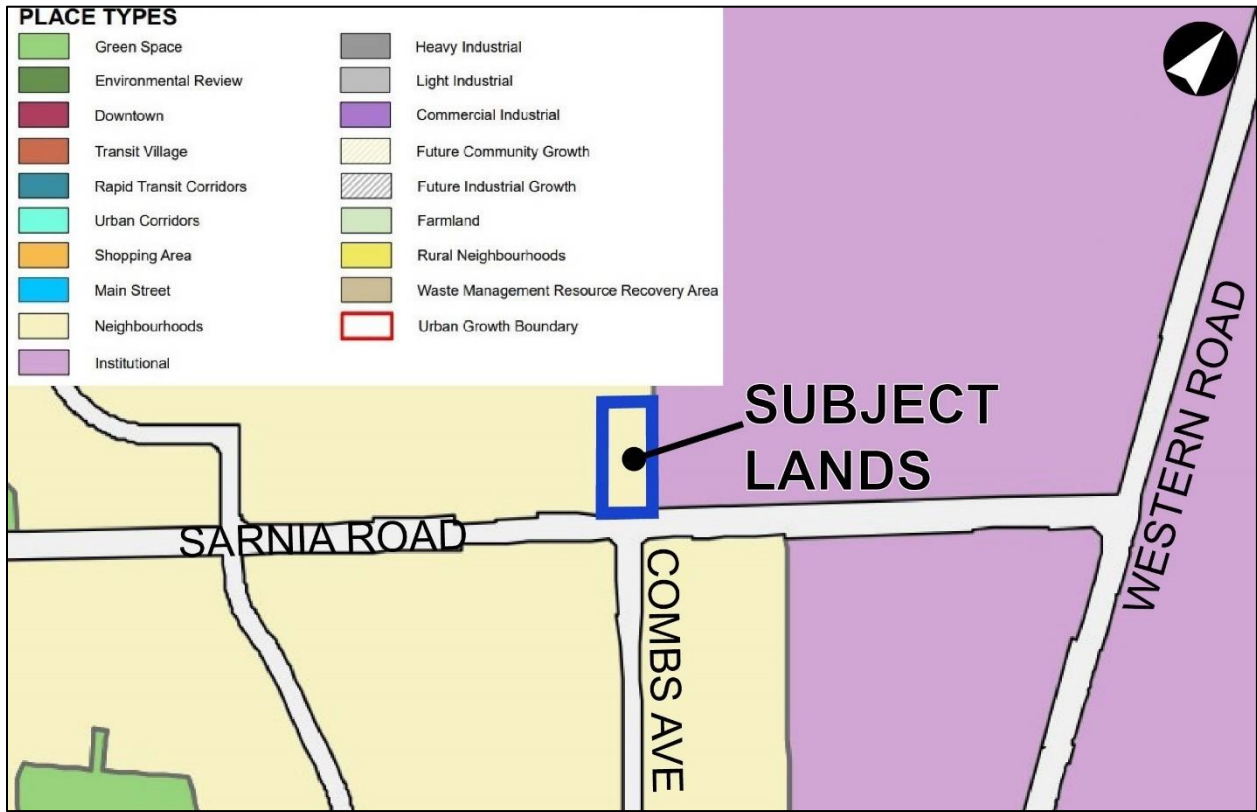


Figure 21: The London Plan – Map 3 Street Classifications (Excerpt)

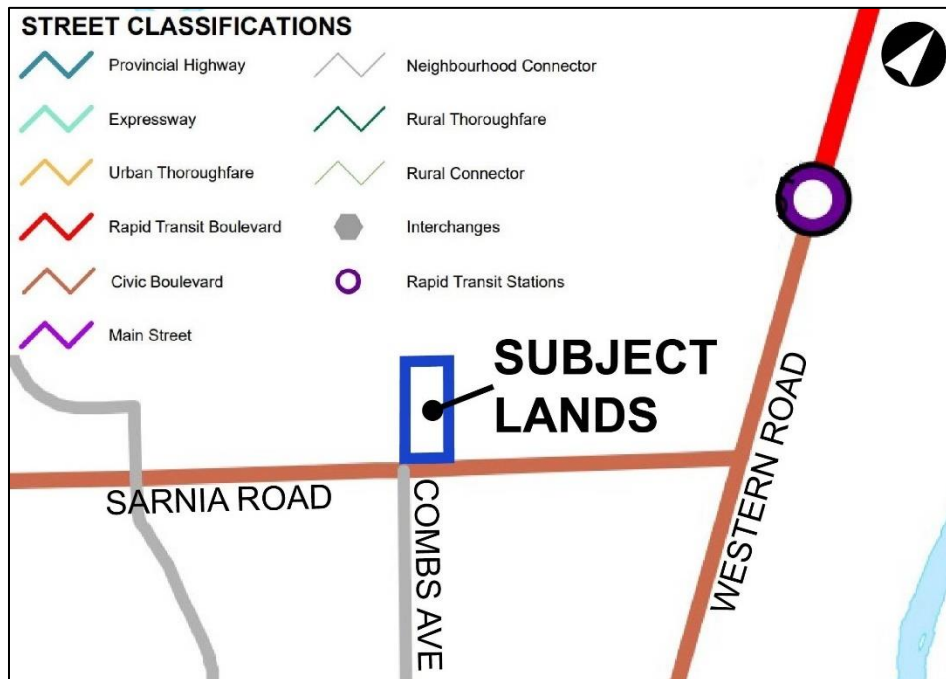


Table 2 provides a policy analysis detailing how the proposed development on the subject lands is consistent with the applicable policies of TLP.

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 service and support active mobility and strong connections within these urban neighbourhoods.</p> <p><u>Policy 91</u> 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><u>Policy 92 3</u> 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><u>Policy 968 3</u> The development conforms to the Residential Intensification policies of this Plan, where those policies do not conflict with Near-Campus Neighbourhoods Policies.</p> <p><u>Policy 968 4</u> The development conforms to any relevant Specific Policies of this chapter.</p>	<p>The subject lands are located within the Primary Transit Area, which is the desired location for residential growth. The proposed stacked 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. The increased density provided by the proposed development will contribute to the intensification target within the Primary Transit Area.</p>

<p><u>Policy 154 2</u> 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><u>Policy 252</u> 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 stacked townhouses are sufficiently sized to accommodate all the requisite components for residential development, including adequate rear yard and easterly side yard setbacks, lot coverage, parking, amenity space, and appropriate vehicular and pedestrian circulation. The proposed development is consistent with the character of the surrounding area, and is an appropriate transition between existing low density development to the west and institutional and commercial development to the east.</p>
<p><u>Policy 255</u> 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 internal sidewalks to provide appropriate connections to the public spaces, building entrances, parking area, and common outdoor amenity area.</p>
<p><u>Policy 269</u> Buildings should be sited to minimize the visual exposure of parking areas to the street.</p> <p><u>Policy 270</u> The location, configuration, and size of parking areas will be designed to support the planned vision of the place type and enhance the experience of pedestrians, transit-users, cyclists, and drivers.</p>	<p>Parking area is provided in the central area of the subject lands, between the two townhouse blocks, supporting a pedestrian-friendly parking area and minimizing visual exposure to the street. The configuration and size of the parking areas accommodate 12 parking spaces, at a parking rate of 0.5 parking spaces per unit.</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 500m west of Western Road, 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 Brescia University College-Western University, 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></p>	

<p>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 style="text-align: center;"><u>Policy 968 1</u></p> <p>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 style="text-align: center;"><u>Policy 965 6</u></p> <p>Encourage a balanced mix of residential structure types at the appropriate locations while preserving stable residential areas.</p> <p style="text-align: center;"><u>Policy 154 8</u></p> <p>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 stacked 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 style="text-align: center;"><u>Policy 965 10</u></p> <p>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 stacked townhouses will mostly be wood cladding, respecting the character of the neighbourhood.</p>
<p style="text-align: center;"><u>Policy 968 2</u></p> <p>The proposed development is consistent with Tables 10 to 12 in the Neighbourhoods Place Type.</p>	<p>The proposed 3-storey stacked townhouses are consistent with permitted uses and heights identified in Tables 10 and 11.</p>
<p style="text-align: center;"><u>Policy 968 5</u></p> <p>The development provides for an adequate amenity area that is appropriately shaped, configured, and located.</p>	<p>The proposed development provides an appropriately sized outdoor amenity area located in the northeasterly side yard of the subject lands.</p>
<p style="text-align: center;"><u>Policy 968 6</u></p> <p>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 westerly portions of the proposed development abut low-density residential uses. We do not anticipate any new or unanticipated impacts as a result of the proposed intensification.</p>
<p style="text-align: center;"><u>Policy 968 7</u></p> <p>Significant heritage resources are protected and conserved where appropriate and necessary according to the Cultural Heritage policies of this Plan</p>	<p>There are no cultural heritage or archaeological concerns with the subject lands or proposed development.</p>
<p style="text-align: center;"><u>Policy 968 8</u></p>	<p>The proposed stacked townhouses are a positive addition to the well-established neighbourhood, supporting a mix of housing types in an</p>

The proposal establishes a positive and appropriate example for similar locations within the Near-Campus Neighbourhoods areas.	appropriate built form and adding a much-needed housing supply to the neighbourhood.
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Based on the above, it is our professional planning opinion that the proposed development and associated Zoning By-law Amendment satisfies the intent of the policies of the London Plan.

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

The subject lands are currently zoned “Residential 1 (R1-10) Zone” in the City of London Zoning By-law No. Z.-1 (Figure 22). 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 (R8-4(_))” to permit stacked townhouses with site-specific provisions to capture the extent of the proposed redevelopment.

Figure 22: City of London Zoning By-law (Source: Interactive Zoning Map)

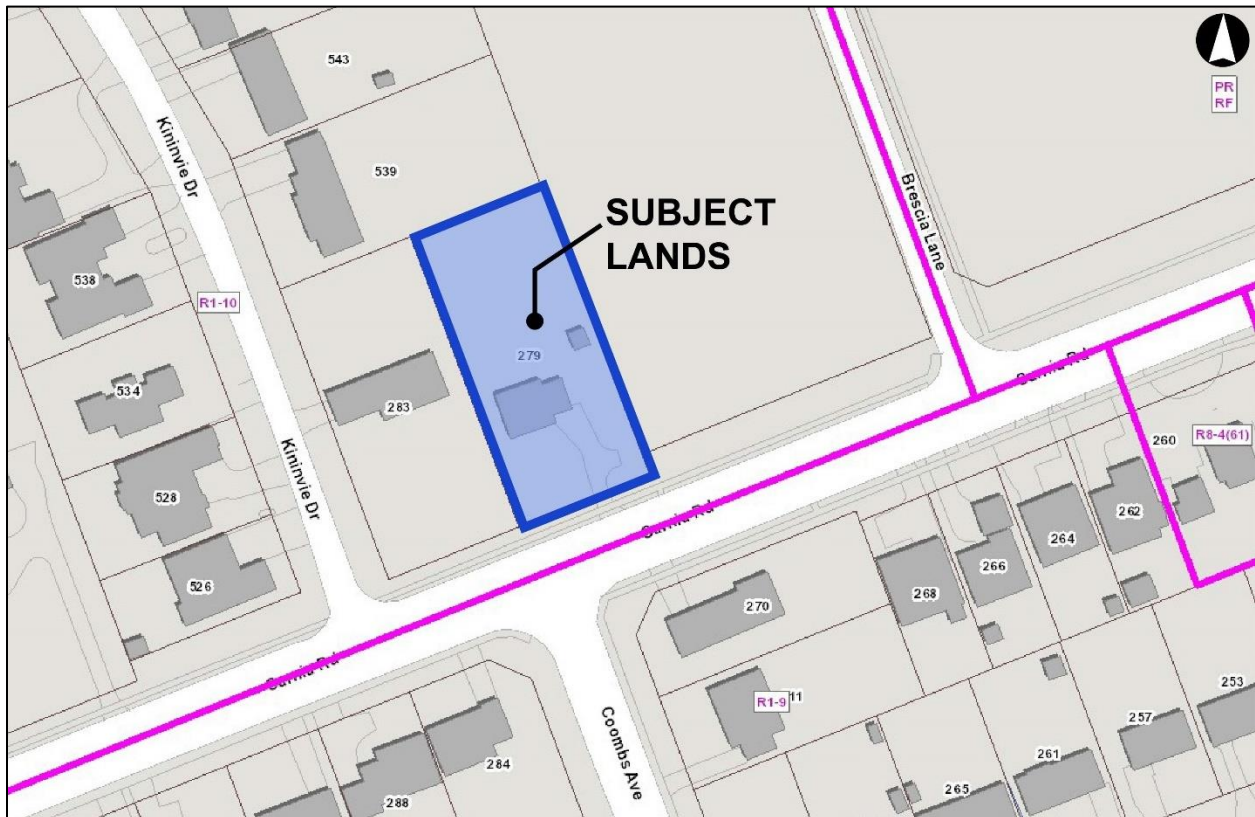


Table 3 provides a comparison of the applicable zoning regulations for the “Residential (R8-4) Zone” with the proposed regulations for the subject lands.

Table 3: Site Statistics

	<i>Required R8 4 Zone</i>	<i>Proposed R8 4() Zone</i>
Permitted Use	Stacked townhousing	Stacked townhousing
Lot Area	1,000.0 m ²	2,197.32 m ²
Lot Frontage	30.0 m	32.6 m
Lot Depth	N/A	67.3 m
Front Yard	7.0 m	*3.2 m
Rear Yard Setback	7.5 m	9.2 m
Interior Side Yard (W)	4.5 m	*3.0 m
Interior Side Yard (E)	4.5 m	8.7 m
Landscape Open Space	30%	43.9%
Lot Coverage	40%	28.2%
Height	13.0 m	11.3 m
Density	75 UPH	*91 UPH
Number of Bedrooms	3 per dwelling unit	3 per dwelling unit
Parking Spaces	0.5 parking per unit = 10	12
Accessible Parking Spaces	4% of total provided parking spaces = 1 Type A	1
Driveway width	6.0m	6.7m

*Denotes special zoning regulation

The proposed specific regulations are discussed below:

Front yard Setback

The proposed development results in a reduced front yard of 3.2m, whereas 7.0m is the minimum required. The intent of the front yard setback 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 the 3.2m front yard setback is the proposed setback from the ultimate road allowance, which includes a 7.94m road widening requirement as part of the proposed development. Several residential lots along Sarnia Road are also subject to road widening requirements and will also present reduced front yard setbacks when the City proceeds to widen the street. As such, the proposed reduced front yard setback of 3.2m ensures a generally consistent street wall, an appropriate spatial separation from Sarnia Road to the building, and provides a strong pedestrian connection.

Interior Side Yard Setback

The proposed development results in a reduced westerly side yard setback of 3.0m, whereas the minimum required is 4.5m. The intent of the interior side yard setback regulation in the R8-4 Zone is to provide adequate spatial separation and reduce the impacts of privacy on abutting properties. It is important to note that the westerly side of Block A and Block B will generally interface with the exterior side yard and northerly side yard, respectively, of the abutting residential lot to the

west. Additionally, a 1.8-m high wood privacy fence is proposed along the lot lines to reduce privacy concerns on abutting parcels. Furthermore, no balconies are proposed on the residential units, which significantly decreases overlooking neighbours' property. As such, the proposed reduced westerly side yard setback of 3.0m provides an appropriate separation between the proposed development and abutting properties with a minimum interface between the proposed development and the neighbouring residential property; and, the proposed fence along the side yard contributes to reducing privacy concerns. Given that, the functionary intent of the R8-4 Zone is maintained.

Density

The proposed development results in a density of 82 UPH, whereas 75 UPH is the standard under the "R8-4 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.

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 November 1, 2023. It is acknowledged that further supporting materials will be required through the Site Plan Approval application.

Tree Preservation Plan

MTE Consultants Inc. (MTE) was retained to complete a detailed tree inventory and evaluate the potential for tree preservation. A total of 38 (thirty-eight) trees were inventoried and it was concluded that 13 trees will be preserved and 25 (twenty-five) trees are suggested for removal, being 8 trees of the 28 trees boundary trees that will require neighbour's consent and 3 trees out of 28 trees located on the City of London's boulevard property.

It is recommended that tree preservation fencing be installed according to the location and details shown on the enclosed tree preservation drawings; and that tree preservation fencing be inspected by MTE before and during construction to ensure that it is working properly.

Sanitary Brief

A Sanitary Capacity Analysis was completed by MTE on April 1, 2024, to analyze the downstream sewer capacity to accommodate the increased flow rate resulting from the proposed development on the subject lands, considering future development lands within the sewershed area.

A total population of 48 (forty-eight) people (20 residential units x 2.4 people per unit) was considered for the sanitary capacity analysis. The City's typical design parameters of 230L/cap/day for daily per capita consumption & an Inflow and Infiltration (I&I) rate of 0.1 L/s/ha and a daily consumption rate of 250 L/cap/day & an I&I rate of 2.0 L/s/ha was used by MTE to determine the sanitary capacity.

The analysis concluded that the existing downstream sewers have sufficient capacity to accommodate sanitary effluent from the proposed site with the exception of one run of sewer on Coombs Road.

Environmental Noise Assessment

An Environmental Noise Assessment was completed by MTE on February 1, 2024, to evaluate the road traffic noise impact from forecasted traffic volumes of Sarnia Road on the subject lands and to recommend noise mitigation measures, if required.

The study concluded that:

- An analysis for attenuating noise barrier requirements is not required for the subject lands
- All floors of the residential units facing Sarnia Road (Block A) will require an analysis to determine the extent, if required, of special building components to meet the minimum STC rating requirements. Furthermore, these units shall be fitted with central air conditioning and a Type D Noise Warning Clause shall be registered on title;
- The residential units facing north in Block A and all the residential units in Block B will require forced air heating as well as provisions for the future installation of central air conditioning by the owner. Furthermore, a Type C Noise Warning Clause shall be registered on title;
- A Type A Noise Warning Clause shall be registered on title for all units in Block A and Block B, as detailed in the enclosed Environmental Noise Assessment report.

8.0 ADDITIONAL CONSIDERATIONS

8.1 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,
- 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.

8.2 Community Open House

On May 15, 2024, a Community Open House was held to provide members of the public with meaningful opportunities to review, understand, and comment on the proposed development and its associated applications.

A total of 18 people attended the Open House, including City staff, the Councillor for Ward 6 (Councillor Sam Trosow), the President of the Orchard Park and Sherwood Forest Neighbourhood Association (Sandy Levin) and neighbourhood residents.

During the community meeting, attendees mostly asked site plan-related questions, including the number of parking spaces to be provided, building setbacks, and proposed measures for privacy concerns regarding nearby residential properties.

Additionally, the attendants sought clarification on whether the units are intended for residential rental purposes and requested clarification on the building design, including architectural treatment and the total number of bedrooms per unit.

Attendees expressed concerns about potential traffic increase along Sarnia Road, service capacity, and privacy issues. Finally, a request has been made for an additional Community Open House during the Site Plan Approval application stage.

9.0 CONCLUSIONS

The proposed Zoning By-law Amendment seeks to permit a proposed back-to-back stacked 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 back-to-back stacked 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 (R8-4(_)) Zone” with some site-specific provisions required.

The form, scale and massing of the proposed stacked 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. 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.