



## PLANNING JUSTIFICATION REPORT

### OFFICIAL PLAN AND ZONING BYLAW AMENDMENTS TO PERMIT A HIGH-RISE APARTMENT BUILDING

2118 RICHMOND STREET  
LONDON, ON

Prepared by:  
**Strik, Baldinelli, Moniz Ltd.**  
1599 Adelaide Street North, #301  
London, ON, N5X 4E8

Prepared for:  
**Encore at Upper Richmond Village**  
303 Richmond Street, #201  
London, ON, N6B 2H8

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## **CONTENTS**

<b>1</b>	<b>Introduction .....</b>	<b>2</b>
<b>2</b>	<b>Site Description .....</b>	<b>3</b>
<b>3</b>	<b>Surrounding Land Uses .....</b>	<b>4</b>
<b>4</b>	<b>Development Proposal .....</b>	<b>5</b>
<b>5</b>	<b>Design Considerations .....</b>	<b>7</b>
<b>6</b>	<b>Pre-Application Consultation .....</b>	<b>10</b>
<b>7</b>	<b>Supporting Studies .....</b>	<b>10</b>
7.1	Traffic Impact Study .....	10
<b>8</b>	<b>Planning Policy Framework and Analysis .....</b>	<b>11</b>
8.1	Provincial Policy Statement.....	11
8.2	The London Plan.....	13
<b>9</b>	<b>Zoning Bylaw Analysis.....</b>	<b>17</b>
<b>10</b>	<b>Proposed Planning Applications .....</b>	<b>20</b>
10.1	Official Plan Amendment .....	20
10.2	Zoning Bylaw Amendment.....	20
10.3	Planning Rationale .....	23
<b>11</b>	<b>Closing .....</b>	<b>23</b>

## **FIGURES**

<b>Figure 1.</b>	<b>Aerial imagery of 2118 Richmond Street (subject site) and surrounding context.....</b>	<b>2</b>
<b>Figure 2.</b>	<b>View of subject site looking east from the Richmond Street North .....</b>	<b>3</b>
<b>Figure 3.</b>	<b>View of subject site looking north from Sunningdale Road .....</b>	<b>3</b>
<b>Figure 4.</b>	<b>Commercial development on Richmond Street to the west of the subject site.....</b>	<b>4</b>
<b>Figure 5.</b>	<b>Low density residential on Sunningdale Road to the south of the subject site.....</b>	<b>4</b>
<b>Figure 6.</b>	<b>Context map illustrating subject site and surrounding uses within 400m.....</b>	<b>5</b>
<b>Figure 7.</b>	<b>Rendering illustrating the front façade looking from Richmond Street and Sunningdale Road intersection.....</b>	<b>7</b>
<b>Figure 8.</b>	<b>Proposed Site Plan Layout.....</b>	<b>8</b>
<b>Figure 9.</b>	<b>Proposed Building Elevation (South) – Looking from Sunningdale Rd E.....</b>	<b>9</b>
<b>Figure 10.</b>	<b>Proposed Building Elevation (West) – Looking from Richmond St. ....</b>	<b>9</b>
<b>Figure 11.</b>	<b>The London Plan, Map 1, Place Types.....</b>	<b>13</b>
<b>Figure 12.</b>	<b>The London Plan, Map 7, Specific Policy Areas.....</b>	<b>14</b>
<b>Figure 13.</b>	<b>Proposed Map Amendment to City of London Zoning Bylaw .....</b>	<b>22</b>

## **TABLES**

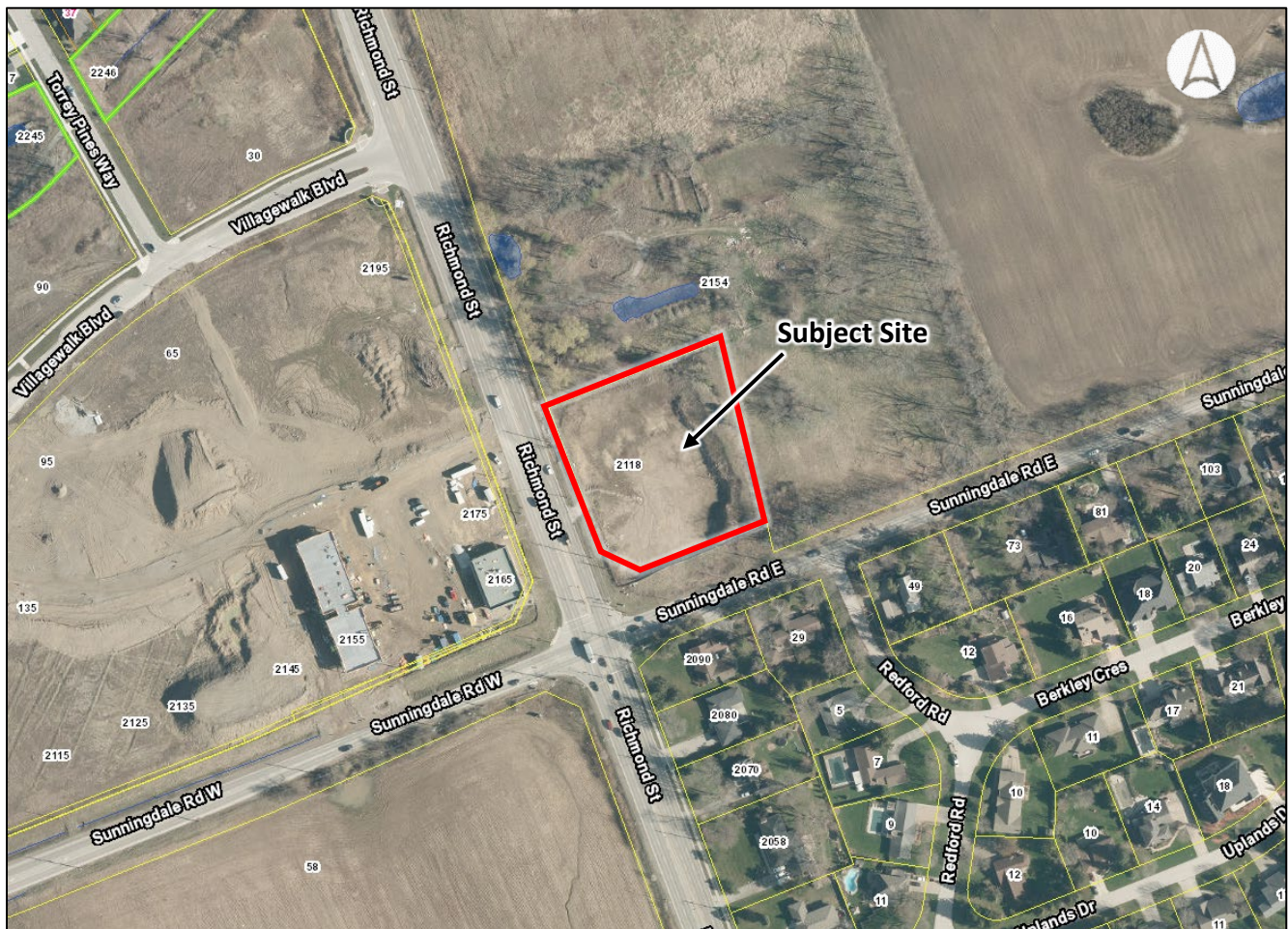
<b>Table 1.</b>	<b>Zoning Data Table Comparison .....</b>	<b>19</b>
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## 1 INTRODUCTION

Strik, Baldinelli, Moniz, Ltd. has been retained by Encore at Upper Richmond Village to prepare a Planning Justification Report (PJR) and provide planning policy analysis in support of an Official Plan Amendment (OPA) and Zoning Bylaw Amendment (ZBA) applications to permit the development of a high-rise apartment building at 2118 Richmond Street North in London, hereinafter referred to as the “subject site” (Refer to **Figure 1**).

Encore at Upper Richmond Village is submitting an OPA and ZBA applications to amend the approved site specific policies and Bone Zoning (B-30) that have been previously established for the site. The intended applications would modify the envisioned 10 storey apartment building with a revised exterior and internal building design, revised site plan layout to adapt to an altered housing market, and increased density and unit configuration.

This report demonstrates that the proposed ZBA application is consistent with the Provincial Policy Statement, is in keeping with the City of London’s land use planning policies, is suitable for the subject site, would be compatible with neighbouring land uses, and would contribute to housing supply within the City of London.



**Figure 1.** Aerial imagery of 2118 Richmond Street (subject site) and surrounding context

## 2 SITE DESCRIPTION

The subject site is located at the northeast intersection of Richmond Street and Sunningdale Road East (**Figure 2** and **Figure 3**). The lot is an irregular shaped lot that is approximately 0.88 ha (2.2 ac) in area, with  $\pm 62\text{m}$  of frontage on Sunningdale Road East and a lot depth of  $\pm 90\text{m}$ . The lands are currently accessed by a gravel driveway from Richmond Street. An Imperial Oil pipeline is located along the frontage of Sunningdale Road and has an associated easement over the front portion of the lands, partially within lands to be dedicated for road widening. Any new buildings on the subject lands are required to be set back a minimum of 20m from the centreline of the underground pipeline.



**Figure 2.** View of subject site looking east from the Richmond Street North  
Source: Google Streetview



**Figure 3.** View of subject site looking north from Sunningdale Road  
Source: Google Streetview

### 3 SURROUNDING LAND USES

The surrounding land uses consist of a mix of low density residential, commercial, and agricultural lands. Refer to **Figure 6**, illustrating the subject site and surrounding context within 400m walking distance.

North & East: Vacant agricultural land planned for future residential development.

West: Across Richmond Street to the west is the Villagewalk commercial shopping centre, currently under construction. Several existing retail units have been completed, consisting of a bank, fitness facility, restaurants, etc. (**Figure 4**).

South: Low density residential, consisting of single detached dwellings fronting onto Sunningdale Road, within “The Uplands” community (**Figure 5**).



**Figure 4.** Commercial development on Richmond Street to the west of the subject site.



**Figure 5.** Low density residential on Sunningdale Road to the south of the subject site

Richmond Street is a 4-lane arterial road (Urban Thoroughfare) that accommodates large volumes of daily traffic. Sunningdale Road East is presently a 2-lane rural cross-section with planned improvements to an ultimate urban 4-lane arterial cross section (Civic Boulevard). Improvements to the Sunningdale Road East and Richmond Street intersection, including underground infrastructure, additional travel lanes, and boulevard improvements are

planned to start in 2024. The subject site is located within 400m from transit facilities (Route #34 Masonville Place – Alumni Hall / Natural Science), commercial and service amenities, and open space (**Figure 6**). Additional cycling and trail infrastructure within Villagewalk and Pebblecreek Park offer alternatives modes of transportation and access to recreational opportunities



**Figure 6.** Context map illustrating subject site and surrounding uses within 400m.

#### **4 DEVELOPMENT PROPOSAL**

The subject site has been previously approved for high-rise residential development, under the B-30 Bonus Zone provisions of the Zoning Bylaw. The current B-30 provisions permit a 10-storey apartment building with a maximum height of 3m, with three-storey townhouses integrated into the base of the building adjacent to Sunningdale Road East, for a maximum of 107 dwelling units (123 units per hectare). The proposed application intends to rezone the subject site to reconfigure the site plan layout and the apartment building design.

The proposed building would be in an ‘L’ shape configuration with a three-storey base. The previous ground oriented, three-storey townhouse units that were integrated into the base would be replaced by apartment units. The revised building facade would maintain an active street frontage with front entrances to ground floor

apartment units along both Sunningdale and Richmond Streets, complete with walkways connected to the public sidewalk.

Above the base is a 7-storey tower oriented to Richmond Street, with a floorplate of up to 1,300m<sup>2</sup>. A stepback has been incorporated into the building from Sunningdale Road East above the 3<sup>rd</sup> and 8<sup>th</sup> level storeys. Each floor has also been redesigned to generally provide smaller floorplans to reflect current development standards, market demands, and increased construction costs. The total number of units would be increased from 107 units to 158 units, an increase of 39 units. The building's structural design would also be revised to allow for a different joist system, requiring an increased floor-to-floor height.

Outdoor common amenity would be provided on the east side of the site and a two amenity areas provided internal to the building. A ground floor amenity room and lounge would great resident on the main floor and a rooftop amenity room/level is proposed to be added to the building, to include both indoor and outdoor communal amenity area, restrooms, mechanical and elevator equipment. The overall building height would amount to 11-storeys with a total height of 40m.

Access would be provided from a single right-in/right-out driveway from Richmond Street. The single driveway would provide vehicle access to the rear of the building with a lay-by (drop off area) and access to the underground parking garage with ramp access located to the northeast corner of the site. The previous driveway access to Sunningdale Road has been removed. The building would be oriented toward both fronting streets; however, an Imperial Oil gas line along Sunningdale Road requires a 20m building setback from the pipeline, creating a 17m "Front Yard". Walkways would connect building entrances to the public sidewalk with enhanced landscaping to provide wayfinding and aesthetic promenade.

Pedestrian access, via walkway, would be maintained to both public rights-of-way. Most of the required parking will be located within the two levels of underground parking, with surface parking located to the rear of the site for primarily visitor parking and barrier free spaces.

A preliminary Site Plan, including below grade parking plans and conceptual elevations are enclosed for consideration. A comparison of the previously proposed is provided below, illustrating the revisions to the site and building elevations.

## 5 DESIGN CONSIDERATIONS

The following outlines the key considerations that have been implemented within the proposed development.

Relationship to the Street: The proposed apartment building would be brought forward to both street frontages (as much as possible), reducing the setback from Richmond Street. The street edge would include a principal building entrance and entrances to individual units via walkways that connect to the public sidewalk along Richmond Street and Sunningdale Road East. Enhanced landscaping and promenade would soften the building massing and improve the public realm at the street level.

Along Richmond Street, the site elevations decline toward the north creating a natural grade difference (low area) near at the site entrance. This requires an elevated entrance along the northwest side of the building and along Richmond Street. The building design incorporates an stairs and walkway to maintain pedestrian connectivity to the principal building entrance, and a landscaped terracing to minimize the impact of an elevated finished floor elevation (see **Figure 7**).



**Figure 7.** Rendering illustrating the front façade looking from Richmond Street and Sunningdale Road intersection.

Pedestrian Realm: Façade treatment at-grade includes a higher proportion of landscaping to enhance the public realm and reduce the perceived scale of the building. Enhanced landscaping is offered along the building’s frontages, particularly along the promenade adjacent to Sunningdale Rod, softening the hardlines of the building and emphasizing a human-scale environment. A network of walkways improve the interconnectivity of the site linking public sidewalks to the subject site’s parking area, unit and principal and ground floor unit entrances, and common outdoor amenity area.

Infrastructure Improvements: The City of London is currently planning and designing infrastructure improvements at the abutting intersection. Current Plans for the improvements have been considered for servicing upgrades and widening of the road and boulevard improvements. The proposed development has considered the future improvements to ensure there is seamless integration, which would be confirmed through the more detailed Site Plan Approval application process.



**Surrounding Uses & Access to Sky View:** Lands to the south of Sunningdale Avenue East consist of low-rise buildings, primarily single detached buildings. To ensure that the proposed building would not negatively impact the buildings to the north, the proposed building would stepback the massing of the building above the 3<sup>rd</sup> and 8<sup>th</sup> storeys to achieve more sky view conditions. Residential uses to the south of the site would also be receive additional setbacks from the proposed building, created by a significant building setback imposed by the existing Imperial Oil gas line within the Sunningdale Road East right-of-way

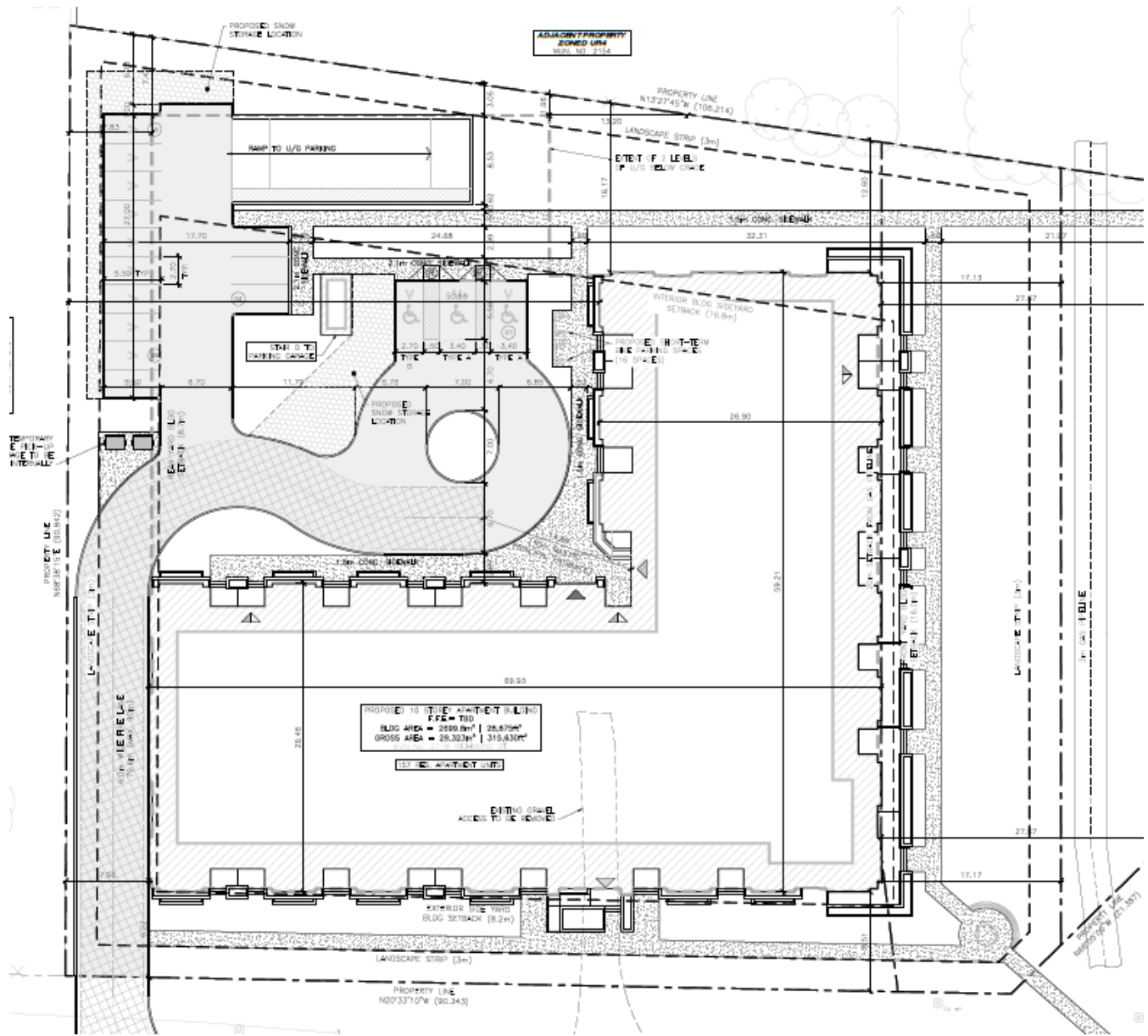


Figure 8. Proposed Site Plan Layout



Figure 9. Proposed Building Elevation (South) – Looking from Sunningdale Rd E



Figure 10. Proposed Building Elevation (West) – Looking from Richmond St.

## **6 PRE-APPLICATION CONSULTATION**

A pre-application consultation meeting took place with City of London Staff on August 22, 2023, to confirm the submission requirements. As set out in the Record of Pre-Application Consultation issued by the City for this revised proposal, the following plans and reports have been prepared in support of the proposed planning applications:

- Planning and Design Report
- Updated Transportation Impact Study
- Tree Preservation Plan

The proposed development was also presented to the Urban Design Peer Review Panel (UDPRP) on September 20, 2023. The UDPRP had subsequently been dissolved by City Council in October 2023.

## **7 SUPPORTING STUDIES**

### **7.1 Traffic Impact Study**

Paradigm Transportation Solutions Ltd. has completed a Traffic Impact Study (TIS), dated July 2024, to review the revised development proposal and assess the impacts on operations of the surrounding intersections. The assessment analysed the existing traffic conditions and the impacts of the proposed development on nearby intersection operations through to 2031. The proposed development is anticipated to generate 57 and 62 trips during the weekday AM and PM peak hours, respectively. This level of traffic generation is considered relatively low additions to the existing and future traffic volumes on the abutting arterials.

The assessed intersections included:

- Richmond Street and Sunningdale Road;
- Richmond Street and Villagewalk Boulevard; and
- The proposed site access onto Richmond Street.

Sunningdale Road in this area is planned for a two-to-four lane road upgrade with some road improvements extending along Richmond Street as well. The anticipated construction would start in the Fall of 2024.

The TIS concludes that the two study area intersections are forecast to operate at acceptable levels of service through to 2031, similar to the existing conditions. The site access on Richmond Street is forecast to operate within acceptable levels of service during the weekday AM and PM peak hours.

## 8 PLANNING POLICY FRAMEWORK AND ANALYSIS

### 8.1 Provincial Policy Statement

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*” to help ensure efficient, cost-efficient development and the protection of resources. The proposed development is consistent with the PPS and more specifically supports the following policies:

PPS Policy	Response
<p>1.1.3.1 Settlement areas shall be the focus of growth and development.</p>	<p>The subject site is located within the urban growth boundary of the City of London and located within the settlement area.</p>
<p>1.1.3.2 Land use patterns within settlement areas shall be based on densities and a mix of land uses which:</p> <ul style="list-style-type: none"> <li>a) efficiently use land and resources;</li> <li>b) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;</li> <li>c) minimize negative impacts to air quality and climate change, and promote energy efficiency;</li> <li>d) prepare for the impacts of a changing climate;</li> <li>e) support active transportation;</li> <li>f) are transit-supportive, where transit is planned, exists or may be developed;</li> </ul>	<p>The development proposal represents an intensification of land use and built form that is compact, efficient, and maximizes land and infrastructure, in proximity to commercial service uses and open space, and served by bus transit.</p>
<p>1.4.1 To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:</p> <ul style="list-style-type: none"> <li>a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through residential intensification and redevelopment and, if necessary, lands which are designated and available for residential development;</li> </ul>	<p>The development proposal would contribute to the housing stock in a compact form, supports a range of housing options and affordability levels, which contribute to city’s housing needs in a location that is well suited for increased density.</p>
<p>1.4.3 Planning authorities shall provide for an appropriate range and mix of housing options and densities to</p>	<p>The proposed building would offer 1-, 2, and 3-bedroom apartment units and would appeal to a</p>

PPS Policy	Response
<p>meet projected market-based and affordable housing needs of current and future residents of the regional market area by:</p> <p>b) permitting and facilitating:</p> <ol style="list-style-type: none"> <li>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</li> </ol> <p>d) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;</p>	<p>wide range of household types and income levels. The proposed apartment building would offer accessible elevator and entrances with the ability to convert units for barrier free design, as needed.</p> <p>The proposed development would create 158 units on the site, at a density of 182 units per hectare. The proposed density is appropriate for apartment buildings within urban areas to be efficiently serviced by municipal infrastructure and to improve transit usage and commercial services.</p>
<p>1.6.6.2 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 use of existing municipal infrastructure is being optimized through Richmond Street and Sunningdale Road East rights-of-way. A Functional Servicing Brief has previously been completed to assess water, stormwater, and wastewater demands and sewer capacities.</p> <p>Intersection improvements at this location are anticipated to start in 2024 to upgrade underground infrastructure and construct new travel lanes and cycling/sidewalk infrastructure. The proposed development would not create the need for additional capital investment or improvements.</p>
<p>1.6.7.4 A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.</p>	<p>The subject site is located within 200m walking distance of a commercial node under development, and bus transit stops linking to the University and Masonville Place. The subject site is also within walking distance of the Pebble Creek Park and trail system.</p>

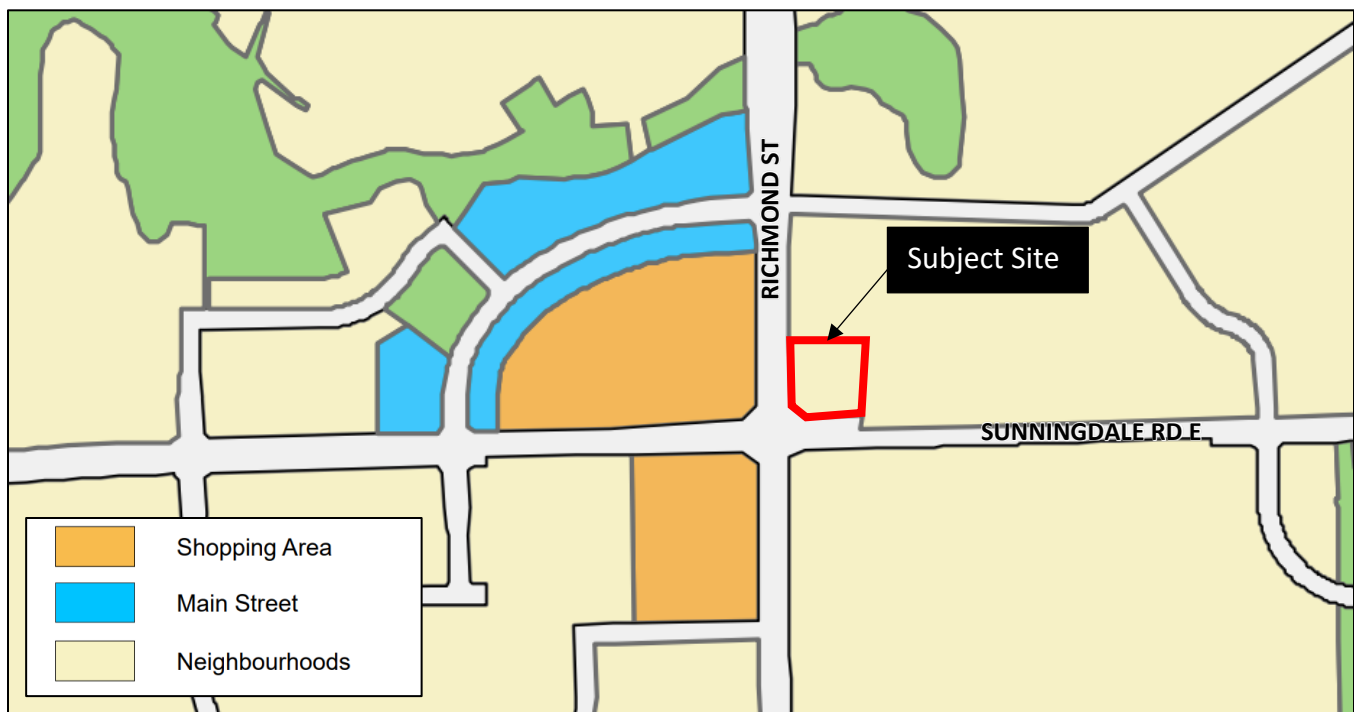
The Proposed Development represents a significant intensification opportunity of a vacant property within the Urban Growth Area of the City. The Proposed Development will efficiently use existing municipal infrastructure and services, will provide for increased densities within proximity to goods and services. Based on the above, it is

the opinion of the writer that the proposed development is consistent with the policies of the 2020 Provincial Policy Statement.

## 8.2 The London Plan

The subject site is located within an area designated ‘Neighbourhoods’ as per Map 1 - Place Type Plan (**Figure 11**) and fronting onto an “Urban Throughfare” (Richmond Street) and “Civic Boulevard” (Sunningdale Road East), per Map 3 of The London. In 2014, an Official Plan Amendment had been approved to create a Specific Policy Area (#16) for the subject site to permit a high-rise apartment building with street oriented townhouse units, up to 10 storeys in height and a density of 123 units per hectare, with enhanced urban design, underground parking, and aesthetically attractive landscaped open space (**Figure 12**).

A text amendment to the previously approved Specific Policy Area (1069\_) is required to permit the proposed development including one additional storey, increased density, as well as the removal of street-oriented townhouses. Refer to Section 10 of this report for the proposed text amendment.



**Figure 11.** The London Plan, Map 1, Place Types

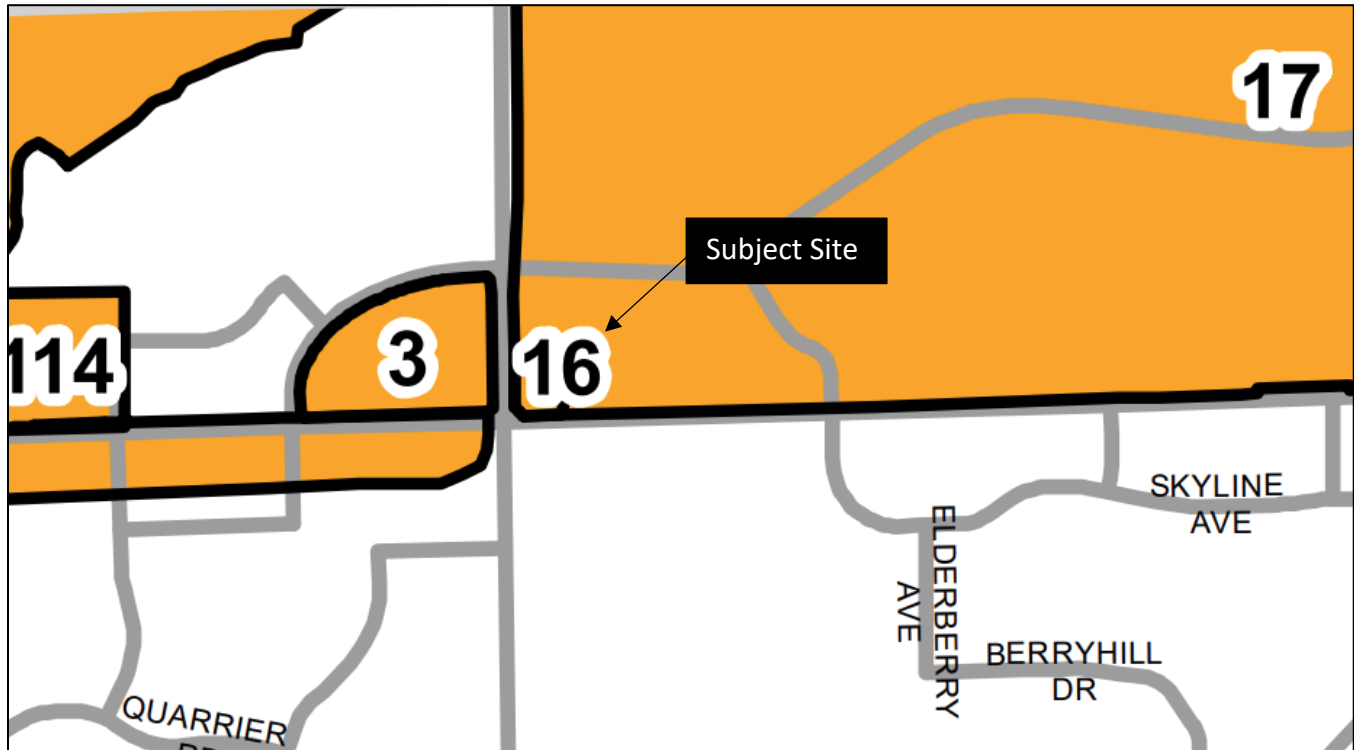


Figure 12. The London Plan, Map 7, Specific Policy Areas

The following evaluates the urban design merits of the proposal relative to the applicable City Building policies of The London Plan.

The London Plan	Response
<p><b>City Building Policies</b></p> <p><b>City Design</b>                      191_ City design also helps us to create pedestrian and transit-oriented environments that support our plans for integrating mobility and land use. It helps us to offer a high quality of life in London and it also allows us to develop neighbourhoods, places and spaces that function more effectively and safely for everyone.</p>	<p>The subject site is located at a Gateway intersection along Richmond Street to the north of the city. The northwest and southwest quadrants of this intersection are planned for commercial and high density residential, encouraging a compact a mixed use node with transit and commercial services within a short walk.</p>
<p>193_ In all of the planning and development we do and the initiatives we take as a municipality, we will design for and foster:</p> <ol style="list-style-type: none"> <li>1. A well-designed built form throughout the city.</li> </ol>	<p>The proposed development would continue to achieve a positive built form and pedestrian experience along the Gateway location to create a sense of place.                      At the street level, appropriate building setbacks allow enhanced landscaping along the street edge.</p>

The London Plan	Response
<ul style="list-style-type: none"> <li>2. Development that is designed to be a good fit and compatible within its context. A high-quality, distinctive and memorable city image.</li> <li>3. Development that supports a positive pedestrian environment.</li> <li>7. A mix of housing types to support ageing in place and affordability.</li> <li>8. Sustainably designed development that is resilient to long-term change.</li> <li>9. Healthy, diverse and vibrant neighbourhoods that promote a sense of place and character.</li> </ul>	<p>Street level front entrances would be provided direct access to the public sidewalk, encouraging walkability and “stoop culture”, animating the front of the building with pedestrian activity. All parking and waste removal is located at the rear of the building and limited to one single access from Richmond Street, reducing the perceived visual impacts of vehicles from the public realm. The proposed development would also create additional 158 dwelling units, of 1-3 bedroom units for a variety of households types.</p>
<p><b>Character</b> 202_ Buildings and public spaces at key entry points into neighbourhoods will be designed to help establish a neighbourhood’s character and identity.</p>	<p>The proposed building has been designed to frame the Gateway location, by locating the ‘L’ shaped building near the corner intersection, by providing emphasizing pedestrian entrances and walkways to the street and providing 360 architecture to remove blank walls from view from the street/intersection. The high-rise building would create a unique landmark when passing through the intersection.</p>
<p><b>Streetscapes</b> 235_ Landscaping should be used to define spaces, highlight prominent features and landmarks, add visual interest, define pedestrian areas, delineate public and private spaces, add comfort and improve health, offer visual screening, and improve the aesthetic quality of neighbourhoods.</p>	<p>The street frontages along Richmond Street and Sunningdale Road East would be designed with additional trees and vegetation, walkways, and low planter features that utilize the site’s topography to make a visually appealing streetscape.</p>
<p><b>Site Layout</b> 255_ Site layout will promote connectivity and safe movement for pedestrians, cyclists, and motorists between, and within, sites.</p>	<p>The proposed development would create a single driveway access from Richmond Street, located at the north property to increase the distance from the intersection. Walkways within the site would connect all building entrances, parking areas/layby, to the public sidewalks along the two frontages.</p>
<p>256_ Buildings should be sited so that they maintain and reinforce the prevailing street wall or street line of existing buildings. Where a streetscape has not been built out, buildings should be sited with regard for the planned street wall or street line.</p>	<p>The proposed building would be located toward the southwest corner of the site, adjacent to the intersection, with active frontages directed to both frontages. The Imperial Oil easement along the south edge of the property would remain vacant with the</p>



The London Plan	Response
259_ Buildings should be sited with minimal setbacks from public streets and public spaces to create an inviting, active, and comfortable pedestrian environment.	building located 20m from the centerline of the pipeline.
261_ Buildings at corner sites should be oriented towards the higher-order street classification.	
266_ 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.	All loading, layby, parking, and waste removal locations would be located to the rear and screened from view by the building.
268_ Sites shall be designed to provide a direct, comfortable, and safe connection from the principle building entrance to the public sidewalk.	Several walkways would connect the principal building entrance and individual unit entrances to the public sidewalk.
273_ Parking structures should be integrated into the design of buildings to ensure the public realm is not negatively affected. Structured parking will be screened.	The majority of parking would be located within an underground parking garage. The access to the underground parking structure would be located to the northeast of the site.
275_ To reduce the visual impact of parking, make efficient use of land, to provide for outdoor amenity space, and promote active uses on street-facing facades, parking for large buildings, such as high-rise residential buildings, office buildings, and mixed-use buildings should be located underground or integrated within the building design.	Parking has been located within an underground garage, allowing for the site to be fully utilized for the building, back of house uses, and communal outdoor amenity area along the east property limit.
<b>Buildings:</b> 285_ To support pedestrian activity and safety, large expanses of blank wall will not be permitted along the street edge.	The street edge would be provided with large windows and front entrances to individual units.
286_ Buildings should be designed to achieve human-scale relationships that are comfortable for pedestrians.	The high-rise building utilizes setbacks from the street to provide space for an enhanced landscaped street edge to provide a human scale.
290_ Buildings located on corner sites should address the corner through building massing, location of entrances, and architectural elements.	The proposed building would address the intersection, providing windows, porticos, and unit entrances along both street frontages. A principal building entrance would be located in the façade abutting Richmond Street, providing secured pedestrian access to the building from the street.
291_ Principal building entrances and transparent windows should be located to face the public right-	

The London Plan	Response
of-way and public spaces, to reinforce the public realm, establish an active frontage and provide for convenient pedestrian access.	
292_ High-rise buildings will incorporate a podium at the building base, or other design solutions to reduce the apparent height and mass of the building on the pedestrian environment, allow sunlight to penetrate into the right-of-way, and reduce wind impacts.	The building is differentiated with a base, middle and top, including setbacks from Sunningdale Road East above the 3 <sup>rd</sup> and 8 <sup>th</sup> levels. The architectural design would create visual interest and address the lower street levels with glazing, entrances, and architectural features (materials, colours, protrusions, articulation, etc.) to differentiate the lower levels of the building from the upper. The building would also be setback 8m from the property line and would mitigate wind impacts on the walkways and public sidewalk with canopy. The tower would be oriented north-south, reducing sun shadows north of the building.
293_ High-rise buildings should be designed to minimize massing, shadowing, visual impact, and the obstruction of views from the street, public spaces, and neighbouring properties. To achieve these objectives, high rise buildings should take the form of slender towers. High rise buildings should not be designed with long axes where they create an overwhelming building mass.	
296_ Rooftop utility equipment should be screened from view and integrated into the overall building design.	The rooftop mechanical penthouse would be incorporated into the building design. A rooftop amenity room and area would create a unique “top” level of the building.
301_ A diversity of materials should be used in the design of buildings to visually break up massing, reduce visual bulk and add interest to the building design.	The building elevations demonstrate the preliminary architectural elements that would visually break up the building, both vertically and horizontally, using high-quality materials.

The redevelopment the subject site meets the general intent of The London Plan as it generates the intended purpose and vision required to support transit oriented development within the City of London. The only policy of The London Plan to which the proposed development does not fully comply is the maximum height of the development and as a result is the source of the requested Official Plan Amendment.

## 9 ZONING BYLAW ANALYSIS

The site is currently zoned with multiple Residential zones (h, h-5, h-11, h-183, R6-5, R8-4, B-30), that permits a wide range of residential uses (**Figure 13**). Generally, the R6-5 Zone permits low/medium density housing forms including Apartment buildings up to 12m in height and a density of 35 UPH. The R8-4 Zone permits Apartment buildings and stacked townhouses up to 13m and a density of 75 UPH.

The holding provisions currently applied to the subject would remain with the land until they are able to be removed at the appropriate time, including:

- h: To ensure the orderly development of lands and the adequate provision of municipal services, the “h” symbol shall not be deleted until the required security has been provided for the development agreement or subdivision agreement, and Council is satisfied that the conditions of the approval of the plans and drawings for a site plan, or the conditions of the approval of a draft plan of subdivision, will ensure a development agreement or subdivision agreement is executed by the applicant and the City prior to development
- h-5: To ensure that development takes a form compatible with adjacent land uses, agreements shall be entered into following public site plan review specifying the issues allowed for under Section 41 of the Planning Act, R.S.O. 1990, c. P.13, prior to the removal of the "h-5" symbol. Notwithstanding this, residential developments of 10 or fewer units are exempt from Public Site Plan Meetings, as per Bill 23, More Homes Built Faster Act, 2022. Permitted Interim Uses: Residential Developments of 10 units or fewer. (Z.-1-94236 deleted and replaced by Z.-1-233100)
- h-11: To ensure the orderly development of lands and the adequate provision of municipal services, the "h-11" symbol shall not be deleted until a development agreement associated with a site plan which provides for appropriate access arrangements to the satisfaction of Council is entered into with the City of London.
- h-183: To ensure that development will not have any negative impacts on the groundwater in the area, with specific attention given to any negative impacts on existing wells, a Hydrogeological Study shall be prepared by a qualified professional and submitted to the City to evaluate the potential impact of the proposed development to area private wells and provide recommendations for monitoring post construction impacts and possible mitigation measures to the satisfaction of the City Engineer prior to the removal of the h-183 symbol. Any recommendations contained therein shall be incorporated into the development agreement to the satisfaction of the City of London. (Z.-1-142350)

It is being requested that the subject site be rezoned to include a Site Specific Residential R9-7 zone to allow for a high-density Apartment building with a density of 182 UPH and several site specific exemptions.

For comparison purposes, **Table 1** provides a review of the current B-30 Bonus Zoning regulations, the standard R9-7 Variation regulations, and the proposed development.

**Table 1.** Zoning Data Table Comparison

Item	Regulation	B-30 Zone (to be removed)	R9-7 Zone Variation	Proposed	Compliance
1	Total Area		-	8,765.5	-
2	Permitted Use	Apartments Townhomes	Apartments Townhomes	Apartments	Yes
3	Lot Area (m <sup>2</sup> ) Minimum	8,000	1,000	8,765	Yes
4	Lot Frontage (m) Minimum	60	30	62	Yes
5	Front Yard Setback (m) Minimum (South)	16	12 <sup>(1.)</sup>	17	Yes
6	Exterior Side Yard Setback (m) Minimum (West)	8.2	12 <sup>(1.)</sup>	9	<b>*NO</b>
7	Interior Side Yard Depth (m) Minimum (East)	13.2 <sup>(3.)</sup>	16 <sup>(2.)</sup>	12	<b>*NO</b>
8	Rear Yard Depth (m) Minimum (North)	8.7	16 <sup>(2.)</sup>	13	<b>*NO</b>
9	Landscaped Open Space (%) Minimum	55	30	52.8	Yes
10	Lot Coverage (%) Maximum	30	40 <sup>(4.)</sup>	28	Yes
11	Height (m) Maximum	33	n/a	40	<b>*NO</b>
12	Number of Units	107 (OP)	-	158	-
13	Density (uph) Maximum	123	150	182	<b>*NO</b>
14	Bicycle Spaces Minimum Short term Long term	-	16 142	16 142	Yes Yes
16	Vehicle Parking Spaces Minimum	-	79 Spaces (0.5/du)	231 Spaces (1.4/du)	Yes Yes
17	Barrier Free Parking Minimum	-	4 Spaces (4%)	7 Spaces (4 Type 'A' & 3 Type 'B')	Yes

\* *Special Provision required.*

(1.) 6 metres (19.7 feet) plus 1 metre (3.3 feet) per 10 metres (32.8 feet) of main building height or fraction thereof above the first 3.0 metres (9.8 feet).

(2.) 1.2 metres (3.9 feet) per 3 metres (9.8 feet) of main building height or fraction thereof above 3 metres (9.8 feet), but in no case less than 4.5 metres (14.8 feet).

(3.) 1.2 metres (3.9 feet) metres (9.8 feet) of main building height or fraction thereof, but in no case less than 4.5 metres (14.8 feet) 6.0 metres (19.7 feet) plus 1.0 metres (3.3 feet) per 1.0 metre (3.3 feet) in height for all portions of a building above 6.0 metres (19.7 feet) in height where the subject site abuts lands zoned Residential R1 or Residential R2.

(4.) 30%; plus up to 10% additional coverage, if the landscaped open space provided is increased 1% for every 1% in coverage over 30%.

## 10 PROPOSED PLANNING APPLICATIONS

### 10.1 Official Plan Amendment

The existing site specific policy (1069\_) is proposed to be amended to:

- remove reference to the Bonus Zone provisions which have been removed from Section 37 of the Planning Act by Provincial Legislation (Bill 108);
- increase the permitted residential density from 123 UPH to 182 UPH, to create a total of 158 dwelling units; and
- revise provision (#1) by removing the required three-storey townhouses along the base of the building.

The following is the proposed text amendment to the Official Plan. Text is **bold and blue** for added text and ~~strikethrough and red~~ for deleted text:

#### 2118 RICHMOND STREET

1069\_ For the property located at 2118 Richmond Street, ~~Type 2 Bonus Zoning may be permitted to allow for~~ a maximum height of up to ~~ten~~ **eleven** storeys, **including a rooftop amenity level**, and a maximum density of up to ~~123~~ **182** units per hectare, subject to the following:

1. The permitted form of development shall be an apartment building with three-storey ~~townhouses forms integrated into the~~ base of the building adjacent to Sunningdale Road East. The apartment building component of the structure shall be restricted to the north portion of the property, thereby locating the maximum intensity away from the single detached dwellings within the residential neighbourhood south of Sunningdale Road East.
2. The proposed form of development shall address the City Design chapter and the Our Tools part of this Plan with respect to, at a minimum, enhanced urban design, the provision of underground parking, and encouraging aesthetically attractive residential developments through the enhanced provision of landscaped open space.

### 10.2 Zoning Bylaw Amendment

Based on the zoning data comparison, a Zoning Bylaw Amendment is required to:

- a) remove the B-30 Bonus Zone; and
- b) create a Site-Specific R9-7(\*\*) Zone

As per the **Table 1**, the proposed site-specific provisions would include the following:

**R9-7 (##)- 2118 Richmond Street**

**a. Regulations**

i)	Exterior Side Yard Depth: (Minimum)	9 m
ii)	Interior Side Yard Depth: (Minimum)	12 m
iii)	Rear Yard Depth: (Minimum)	13 m
iv)	Landscaped Open Space: (Minimum)	48.4 %
v)	Lot Coverage: (Maximum)	28 %
vi)	Height: (Maximum)	40 m
vii)	Density: (Maximum)	182 units per hectare
viii)	Building setback from Sunningdale Road East:	
	a. Above 3 <sup>rd</sup> Floor (Minimum)	21 m
	b. Above 8 <sup>th</sup> Floor (Minimum)	29 m



Figure 13. Proposed Map Amendment to City of London Zoning Bylaw

### 10.3 Planning Rationale

As mentioned, the intended application and proposed development updates the intending building and site layout that was previously approved in 2014 under the B-30 Bonus Zone. Generally, the proposed building configuration and site layout would maintain the same intent as the B-30 Bonus Zone; however the integrated townhouses would be replaced with apartment dwelling units, an additional storey would be added to the building for a rooftop amenity room, the internal floor plan and structural design would receive an update, and the façade of the building would be improved.

The proposed development would intensify the vacant site and improve the utilization of the existing and planned infrastructure in the area, including imminent road and servicing improvements at the intersection of Richmond Street and Sunningdale Road. In addition, the proposed development is located within walking/cycling distance of bus transit facilities, trails and open space, and a commercial node that is currently under development. This location is appropriate for high-density development and supports the overall vision of intensification and creation of new housing in suitable locations.

Consistent with the design criteria and vision of the 2014 development concept, the revised building design considers the built form and its compatibility with the surrounding area. The proposed development maintain a 3 storey base along Sunningdale Road and locates the highest intensity of the tower to the rear of the site, stepping back the building above the 3<sup>rd</sup> and 8<sup>th</sup> storey levels. The base of the building maintains the “street-oriented” concept by connecting front doors of ground level units to the public sidewalk and encouraging walkability; and providing a human scale streetscape by creating appropriate building setbacks, architectural features, and using landscaping to enhance the streetscape.

## 11 CLOSING

Based on a review of the Subject site, surrounding context, supporting technical studies, and applicable planning documents and policies, it is my opinion that the proposed Official Plan and Zoning Bylaw Amendments represent sound land use planning practice for the following reasons:

- The proposal is consistent with the policies of the Provincial Policy Statement, 2020, which promotes healthy, liveable and safe communities by accommodating appropriate intensification and recognizes the need for municipalities to accommodate growth in a cost effective manner by encouraging a range of built forms, housing types and densities.
- The proposed development is of a height, scale and intensity which is planned for this area, and uses mitigation in the form of setbacks and stepbacks to reduce perceived massing from the lower density residential development south of Sunningdale Road East.



- The proposed Official Plan Amendment to revise the text of an existing Specific Policy Area is considered minor and maintains the intended vision for the site's development.
- The proposed Zoning Bylaw Amendment would permit a built form that is well-designed, compact, unique, and compliments the Gateway corridor and the streetscape; and
- The proposed application allows for residential intensification that is designated for residential development and represents an efficient utilization of land, infrastructure, and resources.

Respectfully submitted,

**Strik, Baldinelli, Moniz Ltd.**

Planning • Civil • Structural • Mechanical • Electrical



Nick Dyjach, MCIP RPP CPT  
Associate, Planning Division Manager