

## Report to Planning and Environment Committee

**To:** Chair and Members  
Planning and Environment Committee

**From:** Scott Mathers, MPA, P.Eng.  
Deputy City Manager, Planning and Economic Development

**Subject:** KAP Holdings Inc.  
2-4 Audrey Avenue & 186-188 Huron Street  
File Number: Z-9755, Ward 6  
Public Participation Meeting

**Date:** September 10, 2024

## Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of KAP Holdings Inc. (c/o Zelinka Priamo Ltd.) relating to the property located at 2-4 Audrey Avenue & 186-188 Huron Street:

- (a) the proposed by-law attached hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting September 24, 2024, to amend Zoning By-law No. Z.-1, in conformity with the Official Plan, The London Plan, to change the zoning of the subject property **FROM** a Residential R1 Special Provision (R1-5(3)) Zone **TO** a Residential R6 Special Provision (R6-5(\_)) Zone;
- (c) The Site Plan Approval Authority **BE REQUESTED** to consider the following design issues through the site plan process:
  - i) Screen all parking areas from the public roadway with enhanced all season landscaping, as well as from neighbouring properties to mitigate any noise or light pollution.
  - ii) Relocate the proposed bicycle parking to be separate from the proposed waste collection area.
  - iii) Explore opportunities to incorporate additional short and long-term bicycle parking on site.
  - iv) Provide a fully integrated pedestrian connection through the central parking area by shifting the southern spur sidewalk and providing an accessible pedestrian crossover.
  - v) Provide a common outdoor amenity space on site.
  - vi) Ensure units fronting the public streets are oriented to the street by including the principal unit entrance (front door) on the street-facing elevation.

**IT BEING NOTED**, that the above noted amendment is being recommended for the following reasons:

- i. The recommended amendment is consistent with the *Provincial Policy Statement, 2020 (PPS)*, which encourages the regeneration of settlement areas and land use patterns within settlement areas that provide for a range of uses and opportunities for intensification and redevelopment. The *PPS* directs municipalities to permit all forms of housing required to meet the needs of all residents, present and future;
- ii. The recommended amendment conforms to The London Plan, including but not limited to the Key Directions, City Building policies, the Neighbourhoods Place Type policies; and
- iii. The recommended amendment would permit an appropriate form of redevelopment at an intensity that can be accommodated on the subject lands and is considered compatible with the surrounding neighbourhood.

## Executive Summary

### Summary of Request

The applicant has requested an amendment to Zoning By-law Z.-1 to rezone the subject lands from a Residential R1 Special Provision (R1-5(3)) Zone to a Residential R6 Special Provision (R6-5(\_)) Zone.

## Purpose and the Effect of Recommended Action

Staff are recommending approval of the requested Zoning By-law Amendment. Staff are recommending approval with special provisions that will facilitate the development. The recommended action will permit the redevelopment of the subject lands for the proposed back-to-back townhouse development.

The recommended action will permit two 3-storey blocks of back-to-back cluster townhouse dwellings with **11 new residential units** in addition to the existing three (3) units for a total of 14 units at a maximum density of 82 units per hectare.

## Linkage to the Corporate Strategic Plan

This recommendation will contribute to the advancement of Municipal Council's 2023-2027 Strategic Plan in the following ways:

- **Strategic Plan Area of Focus: Housing and Homelessness**, by ensuring London's growth and development is well-planned and considers use, intensity, and form.
- **Strategic Plan Area of Focus: Housing and Homelessness**, by increasing access to a range of quality, affordable, and supportive housing options that meet the unique needs of Londoners.
- **Strategic Plan Area of Focus: Housing and Homelessness**, by supporting faster/streamlined approvals and increasing the supply of housing with a focus on achieving intensification targets.

## Analysis

### 1.0 Background Information

#### 1.1 Previous Reports Related to this Matter

Consent Report – 186/188 Huron Street (B.049/05)

Consent Report – 186/188 Huron Street (B.086/06)

Consent Report – 186/188 Huron Street (B.028/07)

Minor Variance Report – 186 Huron Street (A.067/07)

Consent Report – 186 Huron Street (B.060/11)

PEC Report – 186/188 Huron Street (OZ-7912) – 2011

#### 1.2 Planning History

City Council, at its session held on October 3, 2011, resolved that the application to amend The Official Plan relating to the property located at 186-188 Huron Street and 2 Audrey Avenue be refused. The application requested an amendment to the Official Plan to change the designation of the subject lands from a Low Density Residential which allows single detached dwellings, semi-detached dwellings, duplex dwellings, and converted dwellings (to a maximum of 2 dwelling units) TO a Policy for Specific Area (Chapter 10 of the 1989 Official Plan) to permit stacked townhouses with a maximum of 56 bedrooms in addition to the permitted uses in the Low Density Residential designation.

The rationale supporting refusal of the application included: the requested amendments are not consistent with the policies of the Provincial Policy Statement, 2005 which encouraged efficient development and land use patterns which sustain the financial well-being of the municipality; ii) the requested amendments were not consistent with the Residential Intensification policies of the Official Plan; iii) the requested amendments were not consistent with the intent of the North London/ Broughdale Neighbourhood Special Official Plan Policies which exist in the area to promote neighbourhood stability; iv) the requested amendments constituted "spot" designation for a site that is not unique and did not have any special attribute which would warrant a site specific amendment; and v) the requested amendments were contrary to a decided matter of Council and an OMB ruling.

Since this decision in 2011, the Provincial Policy Statement has been updated on multiple occasions. The London Plan has also replaced the 1989 Official Plan which contemplates townhouse dwellings at a maximum of 3-storeys at this location. The North London/Broughdale Neighbourhood Special Official Plan Policies were also not carried over to The London Plan, and are therefore, no longer applicable to the subject lands.

### **1.3 Property Description and Location**

The subject lands, municipally known as 2-4 Audrey Avenue and 186-188 Huron Street, are at the intersection of Audrey Avenue and Huron Street in the North London Planning District. The subject lands are comprised of four separate parcels, which once consolidated would have a total area of approximately 0.17 hectares (1,709.3 square metres), 37.1 metres of frontage along Huron Street and 53.9 metres of frontage along Audrey Avenue. The subject lands are comprised of four parcels, each containing a single detached dwelling of varying heights and separate access points from Audrey Avenue and Huron Street. The existing single detached dwelling at 2 Audrey Avenue is proposed to be demolished while the existing dwellings at 4 Audrey Avenue and 186-188 Huron Street are proposed to be incorporated into the proposed development. Public sidewalks exist on both sides of Audrey Avenue and Huron Street.

The subject lands are part of an established neighbourhood consisting primarily of low-density residential uses in the immediate surrounding area, with a greater diversity of residential densities further east along Richmond Street. Adjacent properties consist of one- and two-storey single detached dwellings. Western University is also in close proximity, located north of the subject lands.

#### **Site Statistics:**

- Current Land Use: Residential
- Frontage: 37.1 metres (Huron Street)
- Depth: 53.9 metres (Audrey Avenue)
- Area: 0.17 hectares (1,709.3 square metres)
- Shape: Regular (Rectangular)
- Located within the Built Area Boundary: Yes
- Located within the Primary Transit Area: Yes

#### **Surrounding Land Uses:**

- North: Residential/Western University
- East: Residential
- South: Residential
- West: Residential

#### **Existing Planning Information:**

- The London Plan Place Type: Neighbourhoods at the intersection of two Neighbourhood Streets
- Special Planning Areas: Primary Transit Area
- Special Planning Areas: Near Campus Neighbourhoods Area
- Existing Zoning: Residential R1 Special Provision (R1-5(3)) Zone



Figure 1- Aerial Photo of the subject lands and surrounding area.

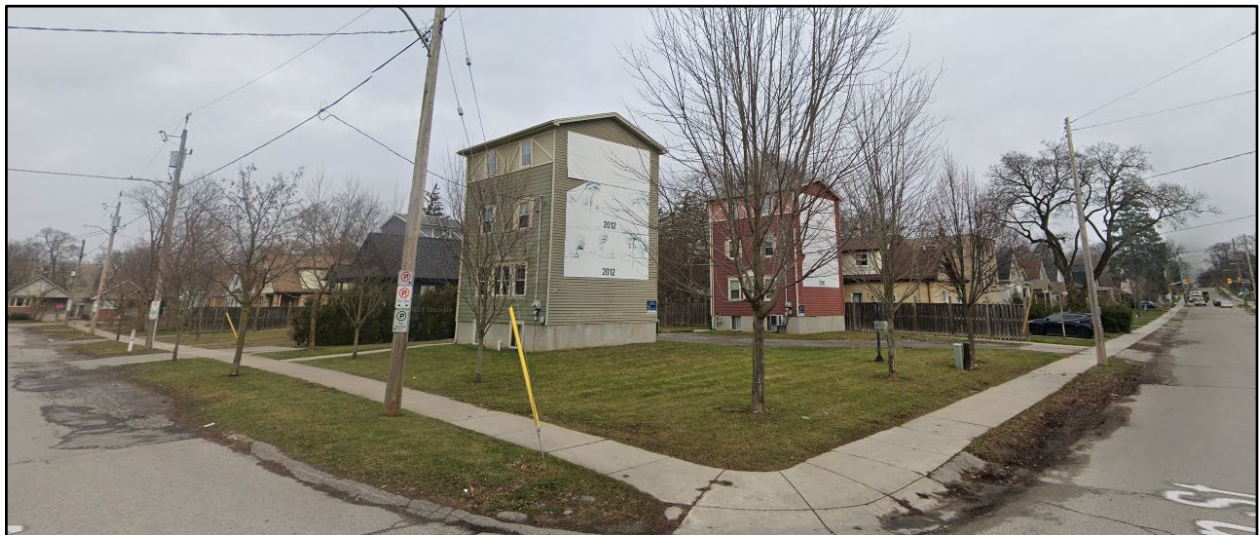


Figure 2 - Streetview of the subject lands (view looking northeast)

## 2.0 Discussion and Considerations

### 2.1 Development Proposal

The applicant is proposing two 3-storey blocks of back-to-back cluster townhouse dwellings with 11 new residential units in addition to the existing three (3) units for a total of 14 units at a maximum density of 82 units per hectare, and a maximum height of 10.3 metres. A 1-storey accessory building is also proposed on the northeasterly portion of the subject lands to provide a common indoor amenity area for the subject lands. Vehicular access to the subject lands will be provided via a driveway from Audrey Avenue. A total of 14 surface parking spaces will be provided as well as 2 short-term bicycle parking spaces. The conceptual site plan is shown below as Figures 3.

The proposed development includes the following features:

- Land use: Residential
- Form: Cluster Townhouse Dwellings
- Height: 3-storeys (10.3 metres)
- New Residential Units: 11-units
- Density: 82 units per hectare
- Lot Coverage: 38%
- Landscape Open Space: 35%
- Parking Spaces: 14 surface parking spaces (1.0 space/unit)
- Bicycle Parking Spaces: 2 short-term parking spaces (0.1/unit)

Additional information on the development proposal is provided in Appendix B.



Figure 3 - Conceptual Site Plan

Additional plans and drawings of the development proposal are provided in Appendix D.

## 2.2 Requested Amendment(s)

The applicant has requested an amendment to Zoning By-law Z.-1 to rezone the subject lands from a Residential R1 Special Provision (R1-5(3)) Zone to a Residential R6 Special Provision (R6-5( )) Zone.

The following table summarizes the special provisions that have been proposed by the applicant and those that are being recommended by staff.

Regulation (R6-5( ))	Required	Proposed	Recommended
Front Yard Depth (minimum)	6.0 metres	4.5 metres	As requested
Exterior Side Yard Depth (minimum)	6.0 metres	4.5 metres	As requested

Regulation (R6-5(_))	Required	Proposed	Recommended
East Interior Side Yard Depth (minimum)	6.0 metres	1.4 metres	As requested
Rear Side Yard Depth (minimum)	6.0 metres	1.4 metres	As requested
Accessory Building Setback	1.6 metres	1.0 metres	As requested
Density (maximum)	35 units per hectare	82 units per hectare	As requested
Number of Bedrooms	3 per dwelling unit	5 per dwelling unit	As requested

### 2.3 Internal and Agency Comments

The application and associated materials were circulated for internal comments and public agencies to review. Comments received were considered in the review of this application and are addressed in Section 4.0 of this report.

Key issues identified by staff and agencies included:

- Planning and Development staff encourage the applicant to continue to explore additional mitigation measures to reduce potential impacts on abutting properties.
- Site layout considerations, including:
  - Screening all parking areas from the public roadway.
  - The relocation of the proposed bicycle parking.
  - Fully integrated pedestrian connections.
  - The provision of an adequately sized common outdoor amenity space.

Detailed internal and agency comments are included in Appendix D of this report.

### 2.4 Public Engagement

On July 8, 2024, Notice of Application was sent to 136 property owners and residents in the surrounding area. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on July 18, 2024. A “Planning Application” sign was also placed on the site.

There were **five** responses received during the public consultation period. Comments received were considered in the review of this application and are addressed in Section 4.0 of this report.

While one response spoke positively about the proposed development, concerns expressed by the public related to:

- Density and over-intensification
- Insufficient vehicle and bicycle parking
- Pedestrian and road safety concerns
- Potential users (e.g., students) of the site

Detailed public comments are included in Appendix E of this report.

### 2.5 Policy Context

#### ***The Planning Act and the Provincial Policy Statement, 2020***

The Provincial planning policy framework is established through the *Planning Act* (Section 3) and the *Provincial Policy Statement, 2020 (PPS)*. The *Planning Act* requires that all municipal land use decisions affecting planning matters shall be consistent with the *PPS*.

Section 1.1 of the PPS encourages healthy, livable, and safe communities which 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. Healthy, livable, and safe communities are sustained by accommodating an appropriate affordable and market-based range and mix of residential types, (1.1.1.b) Further, the PPS directs planning authorities 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 (1.4.1).

The policies of the PPS direct planning authorities to identify appropriate locations and promote opportunities for transit-supportive development and accommodating a significant supply and range of housing options through intensification and redevelopment where it can be accommodated. The PPS also considers existing building stock, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs (1.1.3.3) and is supportive of development standards which facilitate intensification, redevelopment, and compact form (1.1.3.4). Planning authorities are further directed to permit and facilitate all housing options required to meet the social, health, economic and well-being requirements of current and future residents as well as all types of residential intensification, including additional residential units and redevelopment (1.4.3b)). Densities for new housing which efficiently use land, resources, infrastructure, public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed, are promoted by the PPS (1.4.3d)).

Land use patterns within settlement areas shall be based on densities and a mix of land uses which: efficiently use land and resources; 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; minimize negative impacts to air quality and climate change, and promote energy efficiency; prepare for the impacts of a changing climate; support active transportation; are transit-supportive, where transit is planned, exists, or may be developed (1.1.3.2). Land use patterns within settlement areas shall also be based on a range of use and opportunities for intensification and redevelopment (1.1.3.2). Finally, the PPS supports long-term economic prosperity by encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply (1.7.1.b).

The mechanism for implementing Provincial policies is through the Official Plan, The London Plan. Through the preparation, adoption, and subsequent Ontario Land Tribunal (OLT) approval of The London Plan, the City of London has established the local policy framework for the implementation of the Provincial planning policy framework. As such, matters of provincial interest are reviewed and discussed in The London Plan analysis below.

As the application for a Zoning By-law amendment complies with The London Plan, it is staff's opinion that the application is consistent with the *Planning Act* and the *PPS*. The proposed development also meets the intent of the *Planning Act* and the *PPS* by promoting residential intensification in the form of back-to-back cluster townhouse dwellings within the urban growth boundary and complete neighbourhood planning.

### ***The London Plan, 2016***

The London Plan (TLP) includes evaluation criteria for all planning and development applications with respect to use, intensity and form, as well as with consideration of the following (TLP 1577-1579):

1. Consistency with the Provincial Policy Statement and all applicable legislation.
2. Conformity with the Our City, Our Strategy, City Building, and Environmental policies.
3. Conformity with the Place Type policies.
4. Consideration of applicable guideline documents.
5. The availability of municipal services.
6. Potential impacts on adjacent and nearby properties in the area and the degree to which such impacts can be managed and mitigated.
7. The degree to which the proposal fits within its existing and planned context.

Staff are of the opinion that all the above criteria have been satisfied.

## **3.0 Financial Impact/Considerations**

### **3.1 Financial Impact**

None.

## 4.0 Key Issues and Considerations

### 4.1 Land Use

The proposed residential use is supported by the policies of the Provincial Policy Statement, 2020 (PPS) as noted above. The subject lands are in the Neighbourhoods Place Type per Map 1 – Place Types, at the intersection of two Neighbourhood Streets, per Map 3 – Street Classifications in The London Plan (TLP). The proposed townhouse dwelling is a contemplated use in accordance with Table 10 – Range of Permitted Uses of The London Plan. Standard townhouse dwellings are permitted on all properties within the Neighbourhoods Place Type. The range of permitted uses under the Residential R6 (R6-5) Zone is also being scoped to permit only those uses permitted in accordance with Table 10 – Range of Permitted Uses of The London Plan.

The subject lands are also located within the Primary Transit Area (PTA) which will be a focus of residential intensification and transit investment within London that will be a good fit within existing neighbourhoods (TLP 90\_). The proposed townhouse dwellings align with the vision of the Neighbourhoods Place Type and PTA by supporting all forms of intensification, while ensuring that they are appropriately located and fit well within their neighbourhood. In this case, the proposed townhouse dwelling use contribute to a diversity and mix of different housing types, intensities, and forms (TLP 918\_2) while also being considered sensitive to, compatible with, and fits within the existing and planned neighbourhood context (TLP 953\_1).

### 4.2 Intensity

The proposed residential intensity is consistent with the policies of the PPS that encourage residential intensification, redevelopment, and compact form (1.1.3.4), an efficient use of land (1.1.1 a), and a diversified mix of housing types and densities (1.4.1). The proposed residential intensity conforms with Table 11 – Range of Permitted Heights in the Neighbourhoods Place Type of The London Plan which contemplates a maximum height of 3-storeys where a property fronts onto a Neighbourhood Street. The proposed height of 3-storeys (10.3 metres) aligns with the vision of the Neighbourhoods Place Type and contributes to the intensification targets within the PTA (TLP, Policy 90\_).

The proposed residential intensity will facilitate an appropriate scale of development that is compatible within the existing and future neighbourhood character (TLP 918\_13). The existing dwellings at 4 Audrey Avenue and 186-188 Huron Street are also proposed to be repurposed and incorporated into the proposed development. As such, the requested 3-storey height seeks to align the new development to that which is existing. The townhouse dwellings also include design features such as a street-oriented built form with screened parking, corner-responsive massing, and appropriate setbacks and landscape buffering to mitigate potential impacts of the height and encourage a pedestrian-scale environment at street level.

Further, the subject lands are of a sufficient size and shape (following the consolidation of the four parcels) to support the use and intensity, while ensuring the height is sensitive to, compatible with, and fits within the existing and planned neighbourhood context. The buildings have been designed in a way that mitigates the impacts of the proposed intensity on the surrounding lower intensity uses, through such considerations as orienting units fronting the public street to the street, designing any street-flanking elevations to include a similar level of architectural detail consistent with the surrounding neighbourhood context, siting the two townhouse blocks with minimum front and exterior side yard setbacks, locating and screening the parking areas internal to the site, and providing interior side yard setbacks that align the new development to that which is existing and which is sufficient to accommodate additional landscape buffering (TLP 953\_1). The development will also facilitate the efficient use of land and existing municipal services, as existing services are available and sufficient to adequately service the proposed number of units (TLP 953\_2 and 3).

### 4.3 Form

The proposed built form is supported by the policies of the *Provincial Policy Statement, 2020 (PPS)* and is contemplated in accordance with the Neighbourhoods Place Type of The London Plan. It is the intent of The London Plan to encourage residential intensification within existing neighbourhoods which add value to neighbourhoods by



adding to their planned and existing character, quality, and sustainability (TLP 937\_). The proposed built form is consistent with the Neighbourhoods Place Type policies and the City Design policies of The London Plan by facilitating an appropriate form and scale of residential intensification that is compatible with the existing and future neighbourhood character (TLP 953\_2). Specifically, the proposed built form supports a positive pedestrian environment, a mix of housing types to support aging in place and affordability and is designed to be a good fit and compatible within its context/neighbourhood character (TLP 193\_).

The built form consists of two 3-storeys (10.3 metres) blocks of back-to-back cluster townhouse dwellings oriented towards Audrey Avenue and Huron Street. To further ensure units fronting the public streets are oriented to the street it is recommended that the principal unit entrances (front door) are provided on the street-facing elevation (TLP 291\_). The development directs the townhouse blocks towards the intersection, acknowledging the subject lands as a corner lot (TLP 936\_). The two townhouse blocks are also sited with minimum front and exterior side yard setbacks to define the street edge, and create an inviting, active, and comfortable pedestrian environment (TLP 259\_). The proposed built form and massing of the townhouse blocks also have consideration for the surrounding land uses and are appropriate within the existing context of the neighbourhood (TLP 953\_2). Furthermore, the existing dwellings at 4 Audrey Avenue and 186-188 Huron Street are proposed to be repurposed and incorporated into the proposed development. As such, the requested interior side yard setbacks seek to align the new development to that which is existing. The proposed development also includes a 1-storey accessory building proposed on the northeasterly portion of the subject lands to provide a common indoor amenity area; a common outdoor amenity space should also be provided on site and is included as a recommended consideration of the Site Plan Approval Authority.

Vehicular access to the subject lands will be provided via a driveway from Audrey Avenue, closing the existing access from Huron Street and promoting connectivity and safe movement for pedestrians, cyclists, and motorists (TLP 255\_). Parking for the proposed townhouse dwellings will be located internal to the site at a rate of 1.0 space per unit, in compliance with the minimum requirement under Zoning By-law Z.-1. The parking areas will generally be visually screened from the street, however, to further mitigate the impacts of the parking areas on the neighbourhood (e.g., noise or light pollution) and encouraging a strong pedestrian-oriented streetscape (TLP 936\_4), the parking areas should be screened with enhanced all season landscaping (TLP 235\_). Short-term bicycle parking spaces will also be provided, as well as pedestrian walkways to ensure connectivity between the building, onsite amenities and to the surrounding public streets. An increased number of short and long-term bicycle parking spaces which are relocated to be separate from the proposed waste collection area, are also recommended as considerations of the Site Plan Approval Authority. Additionally, a fully integrated pedestrian connection through the central parking area by shifting the southern spur sidewalk and providing an accessible pedestrian crossover would also further assist in creating a strong internal pedestrian environment.

Through the review of the application and consideration of concerns raised by the public, staff recommended matters such as screened parking and a common outdoor amenity place be considered by the Site Plan Approval Authority. Staff are satisfied that these matters can be sufficiently addressed through a subsequent Site Plan application.

#### **4.4 Near Campus Neighbourhoods Areas**

The Near-Campus Neighbourhoods (NCN) are located within proximity to Western University and Fanshawe College and are identified as extremely valuable city neighbourhoods that will be planned to enhance their livability, diversity, vibrancy, culture, sense of place, and quality of housing options for all (TLP 962\_, 963\_ and 964\_). The subject site is in proximity to Western University and is subject to the Near-Campus Neighbourhoods policies. To augment the applicable place type policies and the Our Tools section of The London plan, Policy 965 requires the Near-Campus Neighbourhoods policies to form part of the evaluation of planning applications within the Near-Campus Neighbourhoods. The criteria relevant to the proposed development include:

- Plan for residential intensification in a proactive, coordinated, and comprehensive fashion;

- Identifying strategic locations where residential intensification is appropriate within Near-Campus Neighbourhoods and which use strong transit connections to link these opportunities to campuses;
- Avoiding incremental changes in use, density, and intensity that cumulatively lead to undesirable changes in the character and amenity of streetscapes and neighbourhoods;
- Encouraging a balanced mix of residential structure types at appropriate locations while preserving stable residential areas and recognizing areas that have already absorbed significant amounts of intensification;
- Encourage appropriate forms of intensification that support the vision for Near-Campus Neighbourhoods and encouraging residential intensification in mid-rise and high-rise forms of development;
- Directing residential intensification to transportation nodes and corridors and away from interior of neighbourhoods;
- Utilizing zoning to allow for residential intensification which is appropriate in form, size, scale, mass, density, and intensity.
- Ensuring that residential projects incorporate urban design qualities that enhance streetscapes and contribute to the character of the neighbourhood while respecting the residential amenity of nearby properties;
- Conserve heritage resources in ways that contribute to the identity of streetscapes and neighbourhoods, in compliance with the Cultural Heritage chapter of The London Plan;
- Encourage affordable housing opportunities; and,
- Ensure intensification is located and designed to respect the residential amenity of nearby properties.

The Near-Campus Neighbourhoods policies supplement the general residential policies in The London Plan. The planning goals for the Near-Campus Neighbourhoods is to ensure that changes in use, density, intensity, and lot size do not lead to undesirable changes in the character and amenity of streetscapes and neighbourhoods (TLP 965\_3). The NCN policies seek to maintain the vibrancy, culture, and sense of place of these neighbourhoods while planning for measured and strategically located intensification and growth (TLP 962\_). The Near-Campus Neighbourhoods will be planned to enhance their livability, diversity, vibrancy, culture, sense of place, and quality of housing options for all residents (TLP 964\_). In Near-Campus Neighbourhoods, most intensification will be directed to place types that are intended to allow for mid-rise and high-rise residential development. Intensification may also occur in some locations within the Neighbourhoods Place where it is permitted in Tables 10 to 12 and meets the Near-Campus Neighbourhoods policies of The London Plan.

The proposed development will not result in a form of development that is inconsistent with the policies for residential intensification in the Near-Campus Neighbourhoods. The proposed development will provide for the intensification of four consolidated lots located at an intersection where townhouse dwellings at a maximum height of 3-storeys are contemplated. The proposed development is appropriate for the size and shape of the land and provides for a built form that is compatible with the existing and future neighbourhood character (TLP 953\_2). The design of the site supports a positive pedestrian environment, a mix of housing types to support aging in place and affordability and is designed to be a good fit and compatible within its context/neighbourhood character (TLP 193\_). The proposed development also encouraging residential intensification in a mid-rise form of development which encourages a balanced mix of residential structure types at appropriate location, consistent with the goals of the Near-Campus Neighbourhoods (TLP 965\_6, 7). The subject lands are also identified as a strategic locations where residential intensification is appropriate within Near-Campus Neighbourhoods as there is a strong transit connection to link this residential intensification to the campuses and surrounding City (TLP 965\_2). Overall, the proposed development is in keeping with the policies of the Near-Campus Neighbourhoods.

Policy 968\_ of The London Plan further outlines that residential intensification or an increase in residential intensity may be permitted in the Neighbourhoods Place Type within Near-Campus Neighbourhoods only where it has been demonstrated that all of the criteria listed below have been met.

- The proposed development is in conformity with the vision and planning goals for Near-Campus Neighbourhoods.

- The proposed development is consistent with Tables 10 to 12 in the Neighbourhoods Place Type.
- The development conforms to the Residential Intensification policies of this Plan, where those policies do not conflict with Near-Campus Neighbourhoods Policies.
- The development conforms to any relevant Specific Policies of this chapter.
- The development provides for an adequate amenity area that is appropriately shaped, configured, and located.
- 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.
- Significant heritage resources are protected and conserved where appropriate and necessary according to the Cultural Heritage policies of this Plan.
- The proposal establishes a positive and appropriate example for similar locations within the Near-Campus Neighbourhoods areas.

Urban design qualities are to be incorporated into the design to ensure intensification projects contribute to the character of the neighbourhood while respecting the residential amenity of nearby properties. Zoning is to be utilized to ensure residential intensification occurs in a manner which is appropriate in form, size, scale, mass, density, and intensity (TLP 965\_9, 10). Staff is agreeable that redevelopment of the subject lands into a townhouse form of development aligns with the intent of the Near-Campus Neighbourhoods policies. The subject lands are also situated within the PTA and are located at an intersection in a strategic location where residential intensification would be appropriate.

As such, through the review of the development in the context of the Near Campus Neighbourhoods policies, staff are satisfied that the recommended zoning and direction to site plan meet the intent of the policies. Furthermore, staff are satisfied that matters related to ensuring that the proposed residential intensification incorporates urban design qualities that enhance the streetscape, complement adjacent properties, and contribute to the character and functional and aesthetic quality of the neighbourhood can be sufficiently addressed through a subsequent Site Plan application.

#### **4.5 Zoning**

The applicant has requested an amendment to Zoning By-law Z.-1 to rezone the subject lands from a Residential R1 Special Provision (R1-5(3)) Zone to a Residential R6 Special Provision (R6-5(\_)) Zone. The following summarizes the special provisions that have been proposed by the applicant and those that are being recommended by staff.

*A maximum density of 82 units per hectare.*

A special provision to permit a maximum density of 82 units per hectare is proposed by the applicant and is being recommended by staff. The proposed maximum density provisions will allow for the implementation of the proposed development, facilitating an appropriate scale of development that is compatible within the existing and future neighbourhood character (TLP 918\_13). The proposed density is consistent with the residential intensification policies of The London Plan that encourage infill development on underused lots (TLP, 939\_5). The proposed development is located in the close proximity of multiple London bus routes, which will support the use of transit by future residents. Further, the subject site is also located close to areas identified as cycling and walking route in The London Plan. As such, staff are of the opinion that the proposed density will support the viability of existing public transit and active modes of transportation.

Additional mitigation measures including reducing the front and exterior side yard depths, ensuring all surface level parking is screened from the public street, and enhanced landscaped buffering to offset any potential adverse impacts of the increased intensity will also be considered by the Site Plan Approval Authority.

*A minimum front yard (Huron Street) and exterior side yard (Audrey Avenue) depths of 4.5 metres.*

Special provisions to permit a minimum front yard (Huron Street) and exterior side yard (Audrey Avenue) depths of 4.5 metres are proposed by the applicant and are being recommended by staff. The intent of front and exterior side yard depths is to ensure sufficient space is provided between the buildings and street to accommodate all onsite

functions while facilitating a pedestrian oriented development. As proposed, the townhouse blocks are sited with setbacks that will define the street edge, create an inviting, active, and comfortable pedestrian environment (TLP 259\_), while also acknowledging the subject lands as a corner lot (TLP 936\_). Further, the reduced setbacks are considered sufficient to ensure for the provision of services, landscaping, and that there are no encroachments into the public right-of-way.

*A minimum interior side and rear yard depth of 1.4 metres, and a minimum accessory structure setback of 1.0 metres.*

Special provisions to permit a minimum north and east interior side yard depth of 1.4 metres are proposed by the applicant and are being recommended by staff. The intent of interior side yard depths is to ensure sufficient space between the building and lot line to accommodate all onsite functions while mitigating potential adverse impacts on adjacent properties. In this case, the special provisions are recognizing the interior side yard setbacks of existing dwellings at 4 Audrey Avenue and 188 Huron Street which are proposed to be repurposed through the ultimate redevelopment of the subject lands. As such, the interior side yard depths are considered existing conditions and will not facilitate the townhouse blocks being located closer to the lot lines.

The minimum interior side yard depths of 1.4 metres are considered sufficient for the provision of site maintenance and functionality between the building and lot line. The setback is not anticipated to negatively impact the abutting property to the east as the setback provides sufficient space for enhanced landscaping and buffering between properties. Additionally, the laneway to the north of the subject lands provides an additional buffer to the abutting lands.

A special provision to permit a minimum accessory structure setback of 1.0 metres is also proposed by the applicant and recommended by staff, as the setback is considered sufficient. Staff have no concerns with the reduced setback as the building placement ensures appropriate spacing between the lot line allowing for light, landscape buffering and fencing.

*To permit a maximum of 5 bedrooms per dwelling unit.*

A special provision to permit a maximum of five (5) bedrooms per dwelling unit is being proposed by the applicant and recommended by staff. Controls on intensity seek to maintain the vibrancy, culture, and sense of place in the Near-Campus Neighbourhoods. Bedroom limits are one of several zoning tools used to effectively implement these goals and priorities for the Near-Campus Neighbourhoods. However, it should be noted that a change to the bedroom limits was introduced as part of a recent City-initiated amendment (OZ-9661), which would increase the bedroom limit of townhouses in the Near-Campus Neighbourhoods from three (3) to five (5). Although the amendment is currently under appeal, the requested amendment aligns with Council's direction for residential intensification in Near-Campus Neighbourhoods. Note that the amendment being considered is site specific to permit a specific proposal, which is separate to the city-initiated amendment, and can proceed for a decision by Council notwithstanding the current Ontario Lands Tribunal appeal.

## Conclusion

The applicant has requested an amendment to Zoning By-law Z.-1 to rezone the subject lands from a Residential R1 Special Provision (R1-5(3)) Zone to a Residential R6 Special Provision (R6-5(\_)) Zone. The requested amendments will permit two 3-storey blocks of back-to-back cluster townhouse dwellings with **11 new residential units** in addition to the existing three (3) units for a total of 14 units and a maximum density of 82 units per hectare. Staff are recommending approval of the requested Zoning By-law amendment with special provisions.

The recommended action is consistent with the Provincial Policy Statement, 2020 (PPS), conforms to The London Plan, contributes to a mix of housing types, and will facilitate a form of residential development at an appropriate scale and intensity.

**Prepared by:**                    **Michaela Hynes**  
**Planner, Planning Implementation**

**Reviewed by:**                 **Catherine Maton, MCIP, RPP**  
**Manager, Planning Implementation**

**Recommended by:**         **Heather McNeely, MCIP, RPP**  
**Director, Planning and Development**

**Submitted by:**                **Scott Mathers, MPA, P.Eng.**  
**Deputy City Manager, Planning and Economic**  
**Development**

Copy:  
Britt O'Hagan, Manager, Current Development  
Mike Corby, Manager, Site Plans  
Brent Lambert, Manager, Development Engineering

## Appendix A – Zoning By-law Amendment

Bill No. (number to be inserted by Clerk's Office)  
2024

By-law No. Z.-1-

A by-law to amend By-law No. Z.-1 to rezone an area of land located at 2-4 Audrey Avenue & 186-188 Huron Street.

WHEREAS this amendment to the Zoning By-law Z.-1 conforms to the Official Plan;

THEREFORE, the Municipal Council of The Corporation of the City of London enacts as follows:

1. Schedule "A" to By-law No. Z.-1 is amended by changing the zoning applicable to lands located at 2-4 Audrey Avenue & 186-188 Huron Street, as shown on the attached map **FROM** a Residential R1 Special Provision (R1-5(3)) Zone **TO** a Residential R6 Special Provision (R6-5(\_)) Zone.
2. Section Number 10.3 of the Residential R8 Special Provision (R6-5(\_)) Zone is amended by adding the following Special Provisions:

R6-5(\_) 2-4 Audrey Avenue & 186-188 Huron Street

a. Permitted Uses

- a. Single detached dwellings
- b. Semi-detached dwelling
- c. Duplex dwelling
- d. Townhouse dwelling

b. Regulations

- a. Front Yard Depth (minimum): 4.5 metres
- b. Exterior Side Yard Depth (minimum): 4.5 metres
- c. East Interior Side Yard Depth (minimum): 1.4 metres
- d. Rear Yard Depth (minimum): 1.4 metres
- e. Density (maximum): 82 units per hectare
- f. Accessory Building Setback: 1.0 metres
- g. Number of Bedrooms: 5 per dwelling unit

3. This Amendment shall come into effect in accordance with Section 34 of the *Planning Act, R.S.O. 1990*, c. P13, either upon the date of the passage of this by-law or as otherwise provided by the said section.

PASSED in Open Council on September 24, 2024, subject to the provisions of PART VI.1 of the *Municipal Act*, 2001.

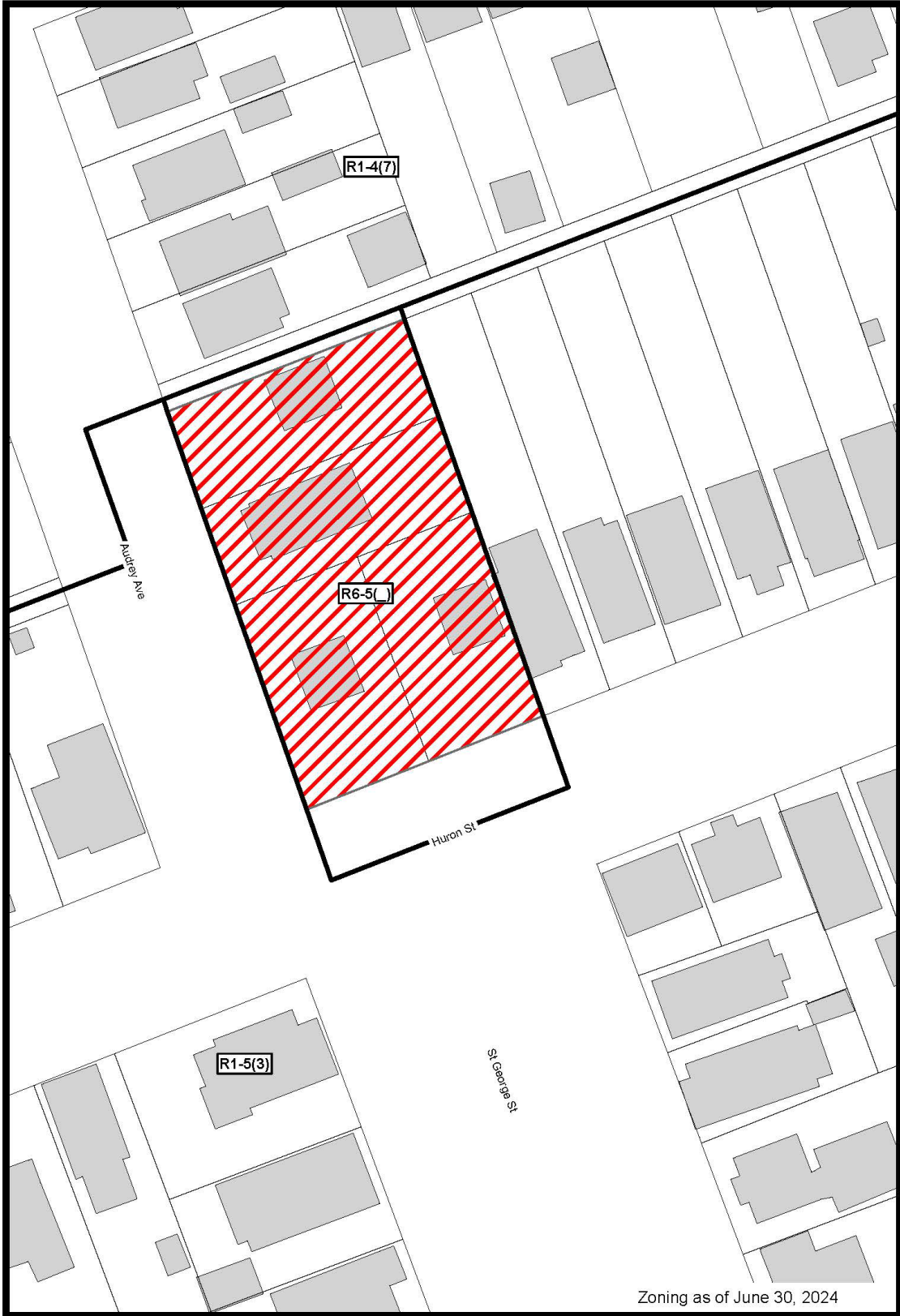
Josh Morgan



Mayor

Michael Schulthess  
City Clerk

First Reading – September 24, 2024  
Second Reading – September 24, 2024  
Third Reading – September 24, 2024

AMENDMENT TO SCHEDULE "A" (BY-LAW NO. Z.-1)



<p><b>File Number:</b> Z-9755 <b>Planner:</b> MH <b>Date Prepared:</b> 2024/08/06 <b>Technician:</b> JI <b>By-Law No:</b> Z.-1-</p>	<p><b>SUBJECT SITE</b> </p> <p><b>1:600</b></p> <p>0 3 6 12 18 24 Meters </p>
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## Appendix B - Site and Development Summary

### A. Site Information and Context

#### Site Statistics

Current Land Use	Residential
Frontage	37.1 metres (Huron Street)
Depth	53.9 metres (Audrey Avenue)
Area	0.17 hectares (1,709.3 square metres)
Shape	Regular (Rectangular)
Within Built Area Boundary	Yes
Within Primary Transit Area	Yes

#### Surrounding Land Uses

North	Residential/Western University
East	Residential
South	Residential
West	Residential

#### Proximity to Nearest Amenities

Major Intersection	Huron Street and Richmond Street (150 metres)
Dedicated cycling infrastructure	Huron Street (onsite)
London Transit stop	Routes 6/13/27 Richmond at Huron (150 metres)
Public open space	Thames Valley Parkway – Baldwin Flats (525 metres)
Commercial area/use	1127-1137 Richmond Street (100 metres)
Food store	Valu-mart (1,350 metres)
Community/recreation amenity	Gibbons Park (450 metres)

### B. Planning Information and Request

#### Current Planning Information

Current Place Type	Neighbourhoods Place Type at the intersection of two Neighbourhood Streets
Current Special Policies	N/A
Current Zoning	Residential R1 Special Provision (R1-5(3)) Zone

#### Requested Designation and Zone

Requested Place Type	N/A
Requested Special Policies	N/A
Requested Zoning	Residential R6 Special Provision (R6-5(_)) Zone

#### Requested Special Provisions

Regulation (R6-5(_))	Required	Proposed	Recommended
Front Yard Depth (minimum)	6.0 metres	4.5 metres	As requested
Exterior Side Yard Depth (minimum)	6.0 metres	4.5 metres	As requested
East Interior Side Yard Depth (minimum)	6.0 metres	1.4 metres	As requested
Rear Side Yard Depth (minimum)	6.0 metres	1.4 metres	As requested
Accessory Building Setback	1.6 metres	1.0 metres	As requested
Density (maximum)	35 units per hectare	82 units per hectare	As requested

Regulation (R6-5(_))	Required	Proposed	Recommended
Number of Bedrooms	3 per dwelling unit	5 per dwelling unit	As requested

## C. Development Proposal Summary

### Development Overview

Two 3-storey blocks of back-to-back cluster townhouse dwellings with 11 new residential units in addition to the existing three (3) units for a total of 14 units and a maximum density of 82 units per hectare.

### Proposal Statistics

Land use	Residential
Form	Cluster Townhouse Dwellings
Height	3-storeys (10.3 metres)
New Residential units	11 units
Density	82 units per hectare
Building coverage	35%
Landscape open space	35%
New use being added to the local community	Yes

### Mobility

Parking spaces	14 surface parking spaces
Vehicle parking ratio	1.0 space/unit
New electric vehicles charging stations	Unknown
Secured bike parking spaces	2 short-term bicycle parking spaces
Secured bike parking ratio	0.1/unit
Completes gaps in the public sidewalk	N/A
Connection from the site to a public sidewalk	Yes
Connection from the site to a multi-use path	Yes

### Environment

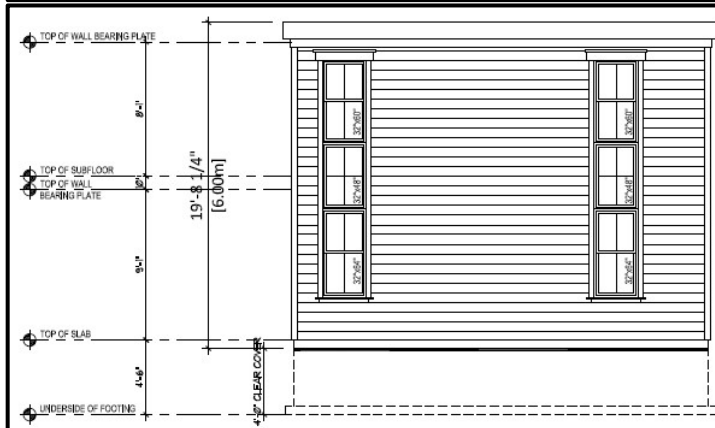
Tree removals	Yes
Tree plantings	Yes
Tree Protection Area	No
Loss of natural heritage features	No
Species at Risk Habitat loss	No
Minimum Environmental Management Guideline buffer met	No
Existing structures repurposed or reused	Yes
Green building features	Unknown

# Appendix C – Additional Plans and Drawings

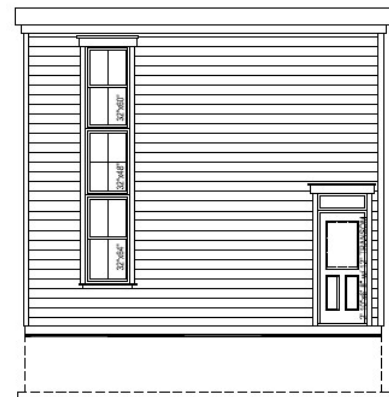
## Conceptual Site Plan



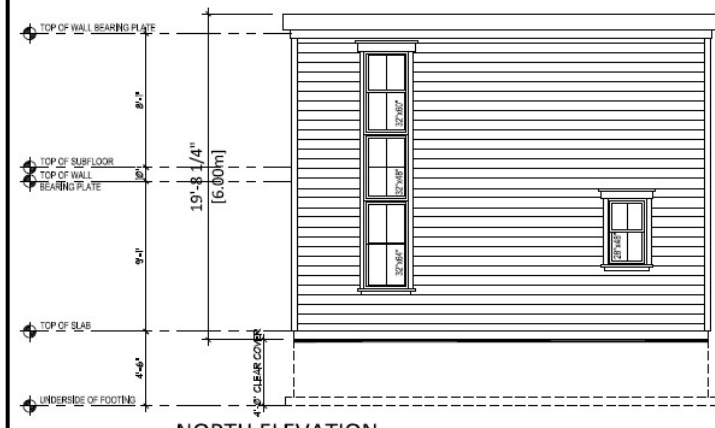
## Building Renderings/Massing Model



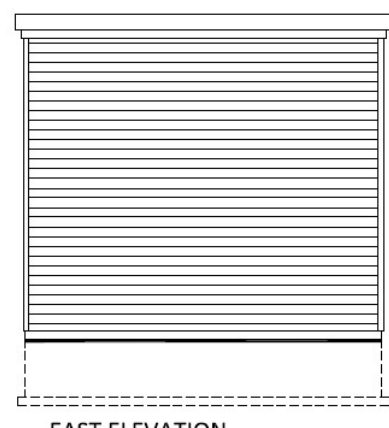
**SOUTH ELEVATION**



**WEST ELEVATION**



**NORTH ELEVATION**



**EAST ELEVATION**

## Appendix D – Internal and Agency Comments

### Site Plan

#### Matters for ZBA

- None at this time.

#### Matters for ZBA

- The applicant is to confirm that they are able to merge all 4 properties into 1 larger property under the same ownership. The Zoning review was completed based on the assumption that this is possible.
- Special Provisions will be required for the following:
  - Accessory Building setback of 1.0m whereas 1.6m is the minimum required;
  - Interior Side Yard setback of 1.4m whereas 6.0m is the minimum required;
  - Front Yard setback of 4.5m whereas 6.0m is the minimum required;
  - Exterior Side Yard setback of 4.5m whereas 6.0m is the minimum required;
  - Rear Yard setback of 1.4m whereas 6.0m is the minimum required.
  - Density of 82 uph whereas 35 is the maximum permitted;
  - 5 bedrooms per dwelling unit whereas 3 is the maximum permitted.

#### Matters for Site Plan

- Provide all necessary fire route information such as location, labelling, and signage.
- Revise the proposed waste collection strategy as municipal vehicles can only collect from the front of the truck and not the side. Alternatively consider private collection and provide a note on the Site Plan drawing if that is the intention. As well, waste collection areas should be screened from all public roadways and residences.
- Screen all parking areas from the public roadway with enhanced all season landscaping, as well as from neighbouring properties to mitigate any noise or light pollution.
- Relocate the proposed bicycle parking to be separate from the proposed waste collection area.
- Provide a fully integrated pedestrian connection through the central parking area by shifting the southern spur sidewalk and providing a accessible pedestrian crossover.
- Provide a common outdoor amenity space on site.
- Confirm how snow storage will be handled on site.
- Ensure that all sidewalks are a minimum of 1.5 metres wide, and that those abutting a parking area are a minimum of 2.1 metres wide to account for vehicular overhang.
- Provide a 1.5 metre landscape buffer along the east interior side yard to screen this property from the neighbouring property.
- Revise the proposed accessible parking space to ensure that it meets the Type A standards within the Site Plan Control By-law.

### Heritage

- There are no cultural heritage or archaeological concerns with this application.

### Urban Design

#### Matters for ZBA

- No further comments

#### Matters for Site Plan

- The following comments were provided to the applicant through the Site Plan Consultation process (SPC24-048):
  - Ensure units fronting the public streets are oriented to the street by including the principal unit entrance (front door) on the street-facing elevation with direct walkway access to the street from the individual unit entrances [TLP Policy 268, 291, 953(2), 965(10)].

- Design any street-flanking elevations to include a similar level of architectural detail as is provided on the front elevation including wrap around porches, front entrances, size and number of windows, materials, massing, and any other relevant architectural detailing [TLP Policy 291, 953(2), 965(10)].
- Provide a centrally located outdoor common amenity space that is adequately sized for the number of units proposed [TLP Policy 295].
- Locate the proposed garbage pick-up area away from the public street frontage [TLP Policy 266].
- Include facilities for temporary bicycle storage (bike racks) close to the building entrance(s) to promote active transportation [TLP Policy 280].
- Provide adequate setbacks from parking areas and drive aisles to the property line to allow space for buffering and landscaping [TLP Policy 282].
- The design and layout of the site should have regard for and incorporate significant mature trees [TLP Policy 210, 258].
- Provide a full set of dimensioned elevations for all sides of the proposed buildings as well as a fully dimensioned and labelled site plan. Further comments may follow upon receipt of the drawings.
  - Provide elevations for the proposed 1-storey accessory building.

## London Hydro

- London Hydro has no objection to this proposal or possible official plan and/or zoning amendment. Any new or relocation of the existing service will be at the expense of the owner.

## Parks Planning

### Matters for Site Plan

- The proposed redevelopment of the lands requires Parkland dedication to be provided for the additional dwelling units. It is to be noted that the applicant, at the time of building permit, will be required to provide parkland dedication in the form of cash-in-lieu pursuant to By-law CP-25

## UTRCA

- The subject lands **are not** affected by any regulations (Ontario Regulation 41/24) made pursuant to Section 28 of the *Conversation Authorities Act*.
- The UTRCA has **no objections** to the application, and we have no Section 28 approval requirements.

## Landscape Architecture

- I do not have any comments to provide.

## Ecology

- No comment.

## Engineering

### *Planning and Development*

- Engineering has no objection to the above noted application and recommends zoning approval.
- The following comments shall be addressed by the applicant at the site plan stage.

### Matters for Site Plan

### *Wastewater:*

- The municipal sanitary sewers to service the site are the 200mm on Audrey Ave and the 200mm/300mm on Huron St.
- A sanitary brief outlining the anticipated peak flow and intended population count would be required as part of a complete application.

### *Water:*

- Water is available to the site via the municipal 150mm DI watermain on Audrey Ave and or the 150mm CI watermain on Huron Street.
- A water servicing report will be required addressing domestic and any required fire flow demands, and water quality.
- Water servicing shall be configured in a way to avoid the creation of a regulated drinking water system.
- Further comments to be provided during site plan application.

### *Stormwater:*

- Note: All applicants and their consultants shall ensure compliance with the recently revised City of London, 2024 Design Specifications and Requirements Manual, as a number of updates have been published to Chapter 6 (Stormwater Management Requirements) including redefining Major and Minor design storm events, LID design measures and requirements, and revised Stormwater Engineering checklists for consultants.
- As per section 6.9 of the DSRM, Permanent Private Stormwater Systems (PPS) are a mandatory part of a regional stormwater servicing strategy for all Medium and High Density Residential site plan developments. A standalone Operation and Maintenance manual document for the proposed SWM system is to be included as part of the system design and submitted to the City for review. This application falls under PPS case 4.
- From available records, the City cannot confirm the existence of PDCs servicing the Huron Street properties. However there are existing services to Audrey Avenue. SWED would recommend maintaining the existing 300mm connection to MN#2 to best service the site and minimize ROW disruption (ref. as-con 19772). The consultant may wish to assess the
- As part of a complete development application, the owner will be required to have a professional engineer submit to and have approved by the City Engineer the design of a PPS system, including a Storm/Drainage Servicing report and drawings which should include calculations, recommendations, and details to demonstrate compliance with the below identified SWM criteria and environmental targets:
  - The consultant shall provide/connect to a pdc in accordance with Drainage bylaw (WM-4) and DSRM requirements.
  - The proposed site conditions shall reduce/match existing peak flows from the 2 through 100 year return period storms. The parcels are tributary to their respective Streets which are separate municipal stormwater systems. The consultant may wish to overstore or compensate such that only one PDC connection is warranted.
  - Any increase in peak flows from pre to post development conditions shall be managed by onsite SWM control design including, but not limited to, bioswales, infiltration galleries/systems, storage volume calculations, flow restrictor sizing, etc. It is suggested that primarily “clean” roof runoff be directed to infiltration features.
  - The on-site private stormwater system must be designed to meet the minimum subwatershed water quality control criteria requirements outlined in DSRM Table 6.4. (70% TSS removal, Central subwatershed)
  - A Stormwater Management checklist for Site Plan shall be signed and submitted with the initial application. Please refer to DSRM Section 6.1.5 & 6.12.
- The Owner agrees to promote the implementation of SWM Best Management Practices (BMP's) within the plan to the satisfaction of the City Engineer, including, but not limited to, decreasing impervious areas, Low Impact Development (LID) when possible. Additionally, as part of climate change resiliency objectives the consultant is to use best efforts to maximize the provided site storage, and is encouraged to consider options, such as but not limited to, optimized grading for ponding areas, roof flow control drains, and orifice controls.
- Grading and Disposal of Storm, Surface and Wastewater shall be in accordance with Section 12 of the Site Plan Control By-Law (SPCB). A grading plan is to be designed by a Professional Engineer and certified by a designated professional, and include the following considerations:
  - The sites grading and drainage shall conform to the overall drainage pattern of the adjacent lands

- Storm water is contained within the site to the greatest extent practical, and directed to an internal storm drainage system, thereby generally preventing drainage onto adjacent properties.
- No surface ponding should develop under a 5-year design storm event.
- The major storm event for the development shall be safely conveyed via overland flow routes on Huron Street or Audrey Avenue, to the greatest extent practical.
- Storm sewers on private property are regulated by the Ontario Building Code (OBC). Where there are no specific regulations in the OBC, applicable design guidance from Chapter 5 & 6 of the City of London, 2024 Design Specifications and Requirements Manual (DSRM) shall apply.

*Transportation:*

- No road widening road dedication needed.
- Detailed comments regarding access design and location will be made through the site plan process.



## Appendix E – Public Engagement

### Public Comment #1 – Dr. Franke Schumacher

- Opposed to the zoning bylaw amendment as the proposed is an inappropriate densification that further adds to the decay of the neighbourhood.

Major Concerns Include:

- Increased density exasperates many existing problems:
  - More temporary residents to the neighbourhood (e.g., students) that has consequences such as noise and poor treatment of the properties.
  - Negative impacts on the quality of life on permanent residents.
  - No concern with the security and safety of the neighbourhood.
  - Not in favor of the density, particularly since there is a new student residence being proposed.
- Insufficient parking
  - Likely student rental that will require additional parking.
  - Consequence is boulevard and lawn parking and safety concerns (e.g., decreases visibility) despite 1hr parking maximums.
  - Effectively 28 parking spaces short assuming that each new unit has 3 separate tenants with vehicles.
  - Reality is that more and more students have cars, and these cars need to go somewhere.
- Short-term bicycle parking should be increased to encourage environmental consciousness.

### Public Comment #2 – Valerie Moretti

Hello Sam and City Hall colleagues...

Please know that I am writing with sorrow, and lower-case-a annoyance regarding Arnon Kaplanski's latest ideas to tear down the silos of ugliness / "towers of spite" in order to add more dense-housing to the corner of Huron and \_\_\_\_\_ where they currently stand.

I am already sorrowful enough about another group of entrepreneurs who seem to have City Hall by the word-that-rhymes-with-halls: Trent Forristal and Ashley Winder and Co who either blithely tear things down in Old North, in order to replace beautiful homes with Sunningdale-meets-Flintstones constructs, not caring about punitive fines, or perhaps, having already pushed past ACO/ Architectural Conservancy celebrants to just 'get their way'.

I want to not write with my own anger or spite, but to express disappointment with a system which doesn't seem to be working.

We live in times where our words, and certainly our childrens' words and actions and job-choices, are expressing a profound need to preserve what is here. To protect that which can be protected. To re-use/ up-cycle/ renovate rather than raze.

May our next generations' visions be fostered and supported by those of us 'in power' now, to DO THE RIGHT THING, in protecting not 'just' natural habitats, but built environments.

Thank you for passing this along to whomever at City Hall might benefit from my opinion joining others, regarding this matter.

I'm grateful to hear from you. I hope that the inclusion of my name in the public record merely denotes the respectful thought I put/ one puts into discussions of concern to neighbours in our area. I also hope that officials, like citizens, think more broadly, regarding how the City of London responds to the needs of our planet and of our city as we try to respond to needs for housing, and apply what builders or land-owners may want to what leaders reflect and determine how, with integrity, a community/ a country should evolve. And thrive.

### Public Comment #3 – Ben Lansink

#### Western University - since 1878

*"With Western Ontario having one third of the population of the province, it merited a university. As a result of a meeting of Huron College alumni held at Christ Church in London on February 20, 1877, a resolution was presented to Bishop Hellmuth, encouraging him to work for a*

university in Western Ontario. Basically in agreement, Hellmuth and the alumni leaders immediately undertook the several steps which culminated in a university. Hellmuth College was purchased for use as the university's first building, a Senate was selected and the institution received the name "The Western University of London, Ontario".



Bishop Hellmuth applied to the Provincial

Government for incorporation and royal assent was given on March 7, 1878. The Senate of the University elected Hellmuth as the first Chancellor."

"The acquisition of the Kingsmill property "Bellevue Farm" and other adjacent farm lands in London Township, immediately north of Huron Street, between 1916 and 1922 provided needed land for expansion."

"In 1924 the University left the Huron College grounds, which had been its home since 1895, and settled on its new campus. Symbolic of the change in locale was a revision of the original Act of Incorporation of 1878 under which the name of the University was altered from "The Western University of London, Ontario" to "The University of Western Ontario", thus reflecting the true regional nature of the institution."

"Huron College retained its original site for the next thirty years. The vacant rooms left by the departure of the University were reconstructed to provide a residence for Western students in Arts and Medicine. Plans were also formulated to build near the new Western Ontario campus. The initial step in this direction was taken in 1932 with the purchase of the Magee property on Western Road to the west of the University. The first building in the planned complex of structures was completed in 1951 and classes commenced there in the autumn of that year. Then the old buildings, which had served Huron College since its inception in 1863, were sold and demolished for an apartment development."

Source: **Western University - since 1878**

The North and the East of London, an historical and Architectural Guide, by John Lutman and Christopher L. Hives with the assistance of Charles Addington, 1982.4

## Broughdale

*“Broughdale, named in honour of the Reverend Charles Crosbie Brough, rector of St. John’s Anglican Church in Arva, was a largely self-contained community in London Township for almost a century. The area stretched from north of Huron Street (the City of London boundary) to the north branch of the Thames River, just below the Mount St. Joseph Motherhouse.”*

*“Brough and his family moved into their new brick rectory, located on clergy reserve lands south of the Thames, in the 1860s. That house, at 1132 Richmond Street, on the northeast corner of Broughdale Avenue and Richmond Street, still stands, although the north wing is a modern addition, faithful to the original architectural style; it has been designated under the Ontario Heritage Act.”*

1132 Richmond houses  
students 2024



*“When the Broughs settled in their new home, their only*

*neighbours were mill owner William Turville and his family. About 1860, Turville built a grist mill near the present site of Parkdale Avenue - remnants of the mill’s tailrace are visible along the Medway today. The community’s main thoroughfare was Proof Line Road (Richmond Street), which ran from London North to Lucan. For many years, travellers passing through Broughdale had to pay two tolls to use the road — one tollgate was at Huron Street, the second at Epworth Avenue.”*

*“In 1901, the London Street Railway was extended from St. James Street north to the settlement of Brough (the original name), then home to about 25 families living on small farm plots. The settlement still lacked stores, churches or a school but the street railroad helped to develop the community as a residential suburb of London.”*

***“During the 1920s, Broughdale’s character began changing when the University of Western Ontario moved to a bluff overlooking the former Kingsmill farm. With the university’s relocation to Broughdale, the community was soon home to professors and other university staff, as well as to student boarders.”***

*“With most of the streets infilled by the 1960s, Broughdale lost its bid to remain part of London Township. On January 1, 1961, it was annexed to the City of London.”*

**Broughdale source:**

Brackets & Bargeboards, © Copyright The Artichitectural Conservancy of Ontario Inc. London Region Branch, London, Ontario 1989.

Lansink’s comments: Western University established in 1878. By 1901 there were about 25 families living in the Brough settlement. As Western grew, professors and students made Broughdale home. Many homes were constructed during the 1960s.

Western is a top 1% university in the world, there are 44,000 plus students from 128 countries and 362,000 alumni across 160 countries word wide.

Western was functioning before any the current residents moved to Broughdale. All residents are aware of the existence of Western University which is still growing, and that student housing is very much in need in 2024.

Student Housing at / near Western University gates - Aug 5, 2024						
Property	Number of Apartments	Sq. Ft. Land Area	M2 Land Area	Hectares	Apartments per hectare	Developer
1164-1170 Richmond	16	28,149	2,615	0.2615	61	Kaplansky
905-907 Richmond	2	7,316	680	0.0680	29	Kaplansky
911 Richmond	4	7,800	725	0.0725	55	Mclver
915 Richmond	4	7,800	725	0.0725	55	Mclver
1124 Sunset	4	10,050	934	0.0934	43	Kaplansky
223 Broughdale	2	7,449	692	0.0692	29	Kaplansky
1235 Ricmond	311	75,295	6,995	0.6995	445	Rise Real Estate
2-4 Audrey 186-188 Huron	14	18,405	1,710	0.1710	82	Kaplansky

Density ranges from 29 to 445 apartment Units per hectare. Z-9755 contemplates 82 Apartments per hectare for 2-4 Audrey 186-188 Huron. 82 apartment units per hectare is reasonable and appropriate.

**Bill 23, *More Homes Built Faster Act, 2022***, has been enacted as Chapter 21 of the Statutes of Ontario, 2022, and received Royal Assent on November 28, 2022. Substantial portions of the Bill came into force upon Royal Assent, while other portions will come into force on a date to be proclaimed by the Lieutenant Governor. Bill 23 is an omnibus piece of legislation that includes significant amendments to 10 separate Acts. Bill 23 no longer requires public meetings for Plans of Subdivision. Bill 23 fundamentally changes how land use planning approvals are processed, approved and implemented in Ontario.

**Planning Act, R.S.O. 1990, c. P.13, Consolidated June 8, 2023**

Restrictions for residential units:

- (3) No official plan may contain any policy that has the effect of prohibiting the use of,
  - (a) two residential units in a detached house, semi-detached house or rowhouse on a parcel of urban residential land, if all buildings and structures ancillary to the detached house, semi-detached house or rowhouse cumulatively contain no more than one residential unit;
  - (b) three residential units in a detached house, semi-detached house or rowhouse on a parcel of urban residential land, if no building or structure ancillary to the detached house, semi-detached house or rowhouse contains any residential units; or
  - (c) one residential unit in a building or structure ancillary to a detached house, semi-detached house or rowhouse on a parcel of urban residential land, if the detached house, semi-detached house or rowhouse contains no more than two residential units and no other building or structure ancillary to the detached house, semi-detached house or rowhouse contains any residential units. 2022, c. 21, Sched. 9, s. 4 (1).

2-4 Audrey and 186-188 Huron consist of four buildings each housing a single dwelling unit.

If Bill 23 is applied, 12 units could be developed vs. 14 requested.			
2-4 Audrey 186-188 Huron	4	3	12

## **Lansink Conclusion**

When Kaplansky (Kap Holdings Inc.) sought planning approvals to construct 4-buildings at 1164-1170 Richmond housing 16-apartment units in 2003, objections were made by the community.

The usual neighbour arguments of increase traffic, to many apartments, hence to much density, there will be value diminution to neighbouring homes, etc. were made and had to be tribunal resolved.

None of the arguments had any merit. They still don't.

Constructed in 2003-2004, the 1164-1170 Richmond complex has been leased to King's University College since August 2020. Safe, affordable, efficient, healthy accommodations for about 80 students per year or 1,600 so far have successfully passed through the complex doors during the last 20-years.

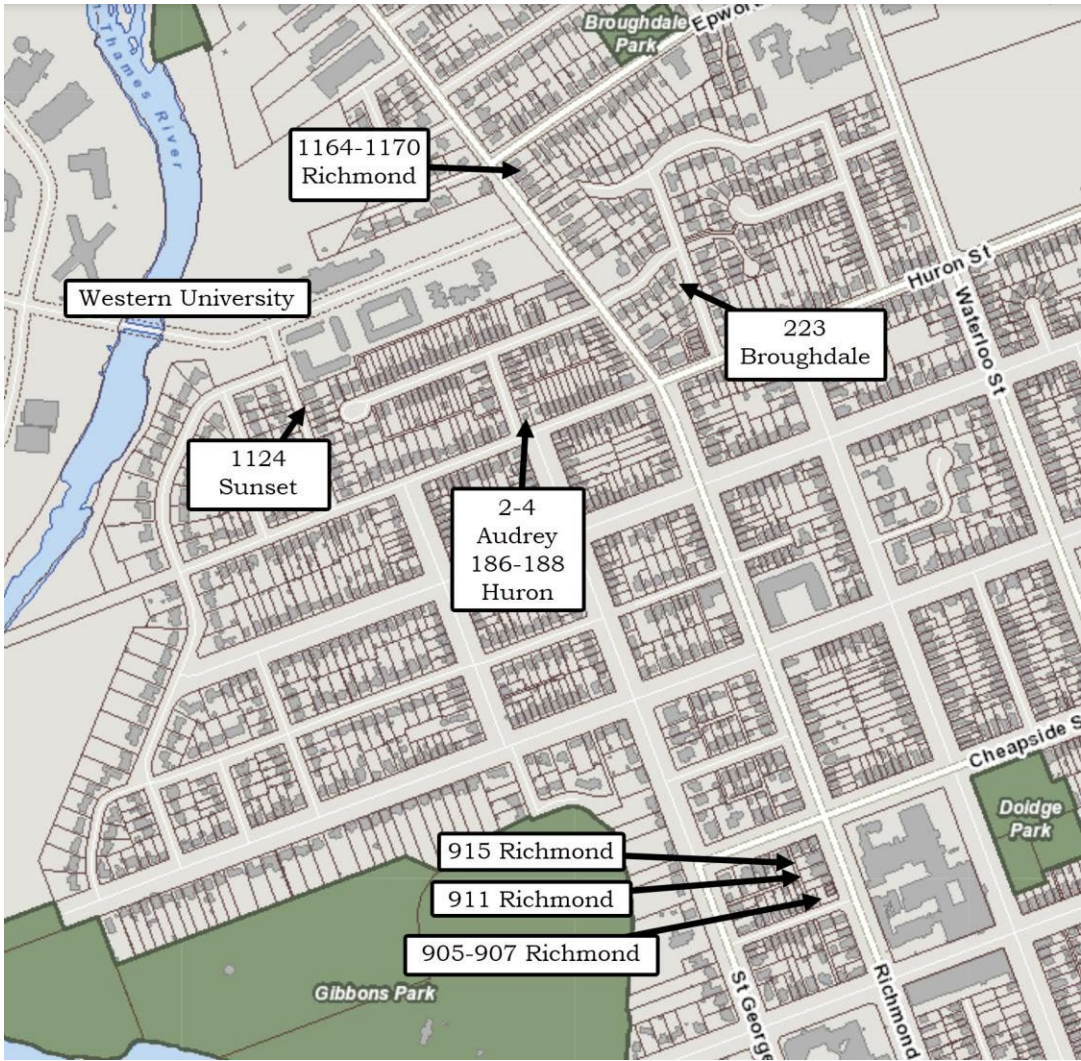
When the Kaplansky Audrey Huron complex has been constructed, King's University College will also lease the buildings to provide Safe, affordable, efficient, healthy accommodations housing for its students. I spoke with a long-term worker at the Kaplansky student housing complex, he noted the only change over the years is that students now require very little parking.

All of the buildings detailed in this report function efficiently and safely as much needed affordable student housing with no detrimental affects to the neighbourhood. Each developer made the decision to foot the capital cost to develop each complex with no monies required from the public nor from King's University College.

The public may object to the Z-9755 application but like 1164-1170 Richmond none of the objections will have any merit.

Student housing near Western University density ranges from 29 to 445 apartment Units per hectare. Z-9755 contemplates 82 Apartments per hectare for 2-4 Audrey 186-188 Huron.

82 apartment units per hectare is reasonable and appropriate.







1132 Richmond Street  
Aug 5 2024 Ben Lansink



911 Richmond Street  
Aug 5 2024 Ben Lansink



905-907 Richmond Street  
Aug 5 2024 Ben Lansink







1235  
Richmond  
Street  
Google

#### **Public Comment #4 – R.D. Gidney**

For consideration by Council re this proposal :

The buildings at 2-4 Audrey Ave. and 186-88 Huron St. are already way out of proportion to the neighbouring residential streets and a source of parking and residential problems.

We are long-time proprietors and residents at 551 St. George St. (50 + years) and owners of the property next door at 553 St George. In that time we have watched the next-door neighbourhood go through some changes; Huron Street is now mainly rental housing/absentee landlord territory, and the neighbourhood around St George has a great many rental properties as well. But our block from Huron to Regent Street, and neighbouring blocks, have had a substantial number of resident owners like ourselves. Now our numbers are dwindling. But we still feel strongly that this can be an attractive and livable area provided developments like the proposed one are not allowed.

The three 3-storey tower blocks that were erected have already too many tenants and problems of spaces for adequate car parking. They are completely out of proportion in a neighbourhood composed of mainly 1 or 1 ½ or 2 storey houses. To allow 14 more car parking spaces, 14 residential units, and 70 (!) bedrooms – i.e. 140 at least tenants – is absurd. That property will become an even greater source of too many cars and traffic, too many people, and quite possibly problems of tenant noise and unacceptable behaviour.

We wish strongly to register our opposition to the proposal.

#### **Public Comment #5 – Mark Tovey**

Dear Ms. Hynes,

I respectfully request that you take into consideration the comments below on the proposed zoning amendments concerning 2-4 Audrey Avenue and 186-188 Huron Street. On behalf of the St. George-Grosvenor Neighbourhood Association and its membership I respectfully submit the following comments regarding the above noted file.

965\_3. Do not allow for incremental changes in use, density, and lot size through zoning amendments, minor variances and consents to sever that cumulatively lead to undesirable changes in the character and amenity of streetscapes and neighbourhoods.

Zoning By-Law Amendment File Z-9755 requests:

- 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 units per hectare, whereas the maximum permitted is 35 units per hectare;

These are each significant changes which cumulatively lead to undesirable changes in the character and amenity of the streetscape and neighbourhood.

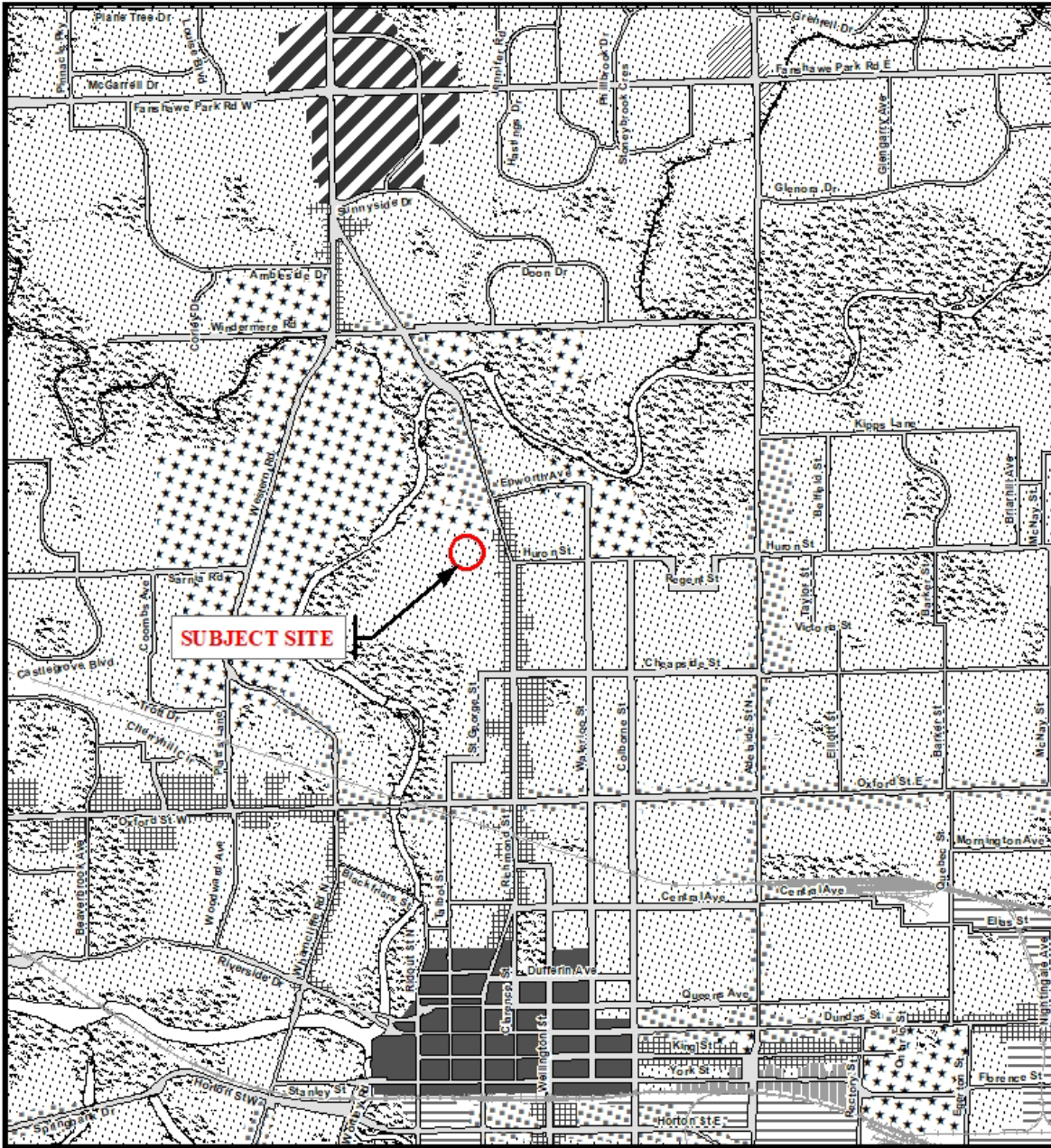
By 965\_3, Zoning By-Law Amendment File Z-9755 should be denied.

Although this would be true of any development of this scale in the interior of the neighbourhood, it is worth noting that the subject property sits at the T-junction at the north end of St. George Street. That location represents a terminating vista along St. George Street, magnifying the impact of any development on that site with respect to the character and amenity of the streetscape and neighbourhood.

We appreciate this opportunity to offer feedback on this project.

Thank you for your consideration.

# Appendix F – Relevant Background



### Legend

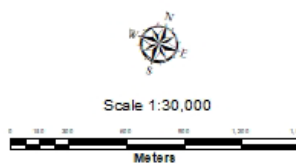
- |                        |                          |   |
|------------------------|--------------------------|---|
| Downtown               | Future Community Growth  | Environmental Review                    |
| Transit Village        | Heavy Industrial         | Farmland                                |
| Shopping Area          | Light Industrial         | Rural Neighbourhood                     |
| Rapid Transit Corridor | Future Industrial Growth | Waste Management Resource Recovery Area |
| Urban Corridor         | Commercial Industrial    | Urban Growth Boundary                   |
| Main Street            | Institutional            |   |
| Neighbourhood          | Green Space              |   |

This is an excerpt from Planning & Development's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

**CITY OF LONDON**  
Official Plan

LONDON PLAN MAP 1  
- PLACE TYPES -

PREPARED BY: Planning & Development



File Number: Z-9755  
Planner: MH  
Technician: JI  
Date: 2024/08/08



**COUNCIL APPROVED ZONING FOR THE SUBJECT SITE: R1-5(3)**

1) **LEGEND FOR ZONING BY-LAW Z-1**

- |   |                                   |
|---|-----------------------------------|
| R1 - SINGLE DETACHED DWELLINGS            | RF - REGIONAL FACILITY            |
| R2 - SINGLE AND TWO UNIT DWELLINGS        | CF - COMMUNITY FACILITY           |
| R3 - SINGLE TO FOUR UNIT DWELLINGS        | NF - NEIGHBOURHOOD FACILITY       |
| R4 - STREET TOWNHOUSE                     | HER - HERITAGE                    |
| R5 - CLUSTER TOWNHOUSE                    | DC - DAY CARE                     |
| R6 - CLUSTER HOUSING ALL FORMS            | OS - OPEN SPACE                   |
| R7 - SENIOR'S HOUSING                     | CR - COMMERCIAL RECREATION        |
| R8 - MEDIUM DENSITY/LOW RISE APTS.        | ER - ENVIRONMENTAL REVIEW         |
| R9 - MEDIUM TO HIGH DENSITY APTS.         |                                   |
| R10 - HIGH DENSITY APARTMENTS             | OB - OFFICE BUSINESS PARK         |
| R11 - LODGING HOUSE                       | LI - LIGHT INDUSTRIAL             |
| DA - DOWNTOWN AREA                        | GI - GENERAL INDUSTRIAL           |
| RSA - REGIONAL SHOPPING AREA              | HI - HEAVY INDUSTRIAL             |
| CSA - COMMUNITY SHOPPING AREA             | EX - RESOURCE EXTRACTIVE          |
| NSA - NEIGHBOURHOOD SHOPPING AREA         | UR - URBAN RESERVE                |
| BDC - BUSINESS DISTRICT COMMERCIAL        |                                   |
| AC - ARTERIAL COMMERCIAL                  | AG - AGRICULTURAL                 |
| HS - HIGHWAY SERVICE COMMERCIAL           | AGC - AGRICULTURAL COMMERCIAL     |
| RSC - RESTRICTED SERVICE COMMERCIAL       | RRC - RURAL SETTLEMENT COMMERCIAL |
| CC - CONVENIENCE COMMERCIAL               | TGS - TEMPORARY GARDEN SUITE      |
| SS - AUTOMOBILE SERVICE STATION           | RT - RAIL TRANSPORTATION          |
| ASA - ASSOCIATED SHOPPING AREA COMMERCIAL |                                   |
| OR - OFFICE/RESIDENTIAL                   | "h" - HOLDING SYMBOL              |
| OC - OFFICE CONVERSION                    | "D" - DENSITY SYMBOL              |
| RO - RESTRICTED OFFICE                    | "H" - HEIGHT SYMBOL               |
| OF - OFFICE                               | "B" - BONUS SYMBOL                |
|   | "T" - TEMPORARY USE SYMBOL        |

**CITY OF LONDON**

PLANNING SERVICES / DEVELOPMENT SERVICES

**ZONING  
BY-LAW NO. Z.-1  
SCHEDULE A**



THIS MAP IS AN UNOFFICIAL EXTRACT FROM THE ZONING BY-LAW WITH ADDED NOTATIONS

FILE NO:

Z-9755

MH

MAP PREPARED:

2024/08/06

Jl

1:800

0 4 8 16 24 32

Meters