

Planning Justification Report

1484 Gore Road

November 27, 2024

Prepared for:
Richfield Custom Homes

Prepared by:
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Project/File:
161414301



Planning Justification Report

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Planning Justification Report

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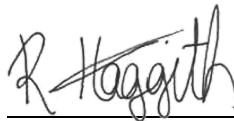


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Executive Summary

Stantec Consulting Ltd. (Stantec) was retained by Richfield Custom Homes (the “Client”), to complete a Planning Justification Report as part of the submission for a Zoning By-law Amendment (ZBA) application. This application is in support of a proposed redevelopment located at 1484 Gore Road in the City of London (Subject Lands). The proposed development involves the demolition of an existing single-detached dwelling, to create eight (8) townhouse units, and a 3.5-storey stacked townhouse complex comprising sixteen (16) residential units, for a total of twenty-four (24) residential units and twenty (20) off-street parking spaces. The Subject Lands has frontage onto Gore Road, which is classified as a Civic Boulevard according to Map 3 – Street Classifications in the London Plan.

The purpose of this report is to provide a planning rationale demonstrating how the proposed development and requested application conforms to the existing Provincial and local land use policy framework. The following policies and regulations were reviewed:

- Provincial Planning Statement, 2024 (Effective as of October 20, 2024)
- The London Plan (Official Plan), 2023 Consolidation
- City of London Zoning By-law No. Z.-1

This report also summarizes the site context, development concept, and other supporting studies that are included in the submission package to provide a comprehensive evaluation of the proposed redevelopment.

Based on an analysis of the existing policy framework and supporting studies, the requested application is consistent with Provincial and local land use policies and regulations. The proposed redevelopment supports housing goals and objectives in the City through intensification while contributing to a more compact and transit-supportive urban structure. The proposed redevelopment represents a more efficient use of the Subject Lands as well as existing public service facilities and infrastructure within its vicinity. In our professional planning opinion, the proposed residential redevelopment represents good planning practice.



1 Introduction

On behalf of our Client, Richfield Custom Homes, this Planning Justification Report has been prepared in accordance with Provincial Planning Statement, 2024, the London Plan (Official Plan), and the City of London Zoning By-law No. Z.-1, for the redevelopment of an existing residential dwelling lot located at 1484 Gore Road, London, Ontario (herein referred to as the Subject Lands). This report has been prepared with consideration of pre-consultation comments received from the City of London, based on the formal pre-consultation meeting held in 2022. The most up-to-date version of the proposed site plan (**Figure 2**) also considers additional revisions, which addresses to the extent feasible public comments and feedback received from the Public Open House held on August 27, 2024.

The evolution of the proposed development concept and the ways in which the most recent site plan (**Figure 2**) addresses both public and Staff comments/concerns are detailed in this report under Section 3.1 Project History, and Section 3.1.1 Response to Public Comments.

This Planning Justification Report is part of a comprehensive and Complete Application package that supports the requested Zoning By-law Amendment (ZBA) application. This report provides a review and analysis of relevant land use policies as they pertain to the relevant Place Type and zoning provisions for the Subject Lands and proposed development. It should be noted that additional design refinements may occur through a future Site Plan Approval process, and as such, the concepts provided within this report should not be considered as final. The proponent acknowledges that any proposed changes or further amendments/variances to zoning regulations will be subject to applicable review and approval processes.

2 Site Description

The Subject Lands are municipally known as 1484 Gore Road in London, Ontario, on the north side of Gore Road, west of the Montebello Drive and Gore Road intersection. It is legally known as Part of Lot 7, Concession B, Geographic Township of London, former Middlesex County, now City of London, Ontario.

Measuring approximately 0.55 hectares (1.36 acres) in size, the Subject Lands has approximately 45.83 m of frontage along Gore Road, which is classified as a Civic Boulevard on Map 3 – Street Classifications in the London Plan (Official Plan). The lot is wider and longer compared to surrounding and abutting residential lots, with the rear half of the property being generally underutilized.

Currently, there is a single-detached dwelling with a detached accessory garage on the Subject Lands. Both structures are proposed to be demolished. The Subject Lands are classified as the Neighbourhood Place Type, according to Map 1 – Place Types, in the London Plan (Official Plan), and zoned R1-6 in the City of London Zoning By-law No. Z.-1. More information about relevant Official Plan policies and zoning provisions can be found in Section 4 of this report.





Figure 1: Site Context

2.1 Surrounding Land Use

There are single-detached dwellings abutting the north, east, and west property lines of the Subject Lands. There is a Hydro One corridor with a utilities tower immediately to the south of the Subject Lands. There is also an underutilized lot to the south of the Hydro One lands, which currently contains a vacant building that was previously an old bingo hall. According to the City's Zoning By-law, the underutilized parcel with the abandoned bingo hall was recently rezoned to the Residential R5-7 Zone, which is a different zone variation that belongs to the same parent zone (R5) as the one proposed for the Subject Lands.

Despite being in a neighbourhood with primarily single-detached dwellings, there are housing types of similar density, such as low-rise apartments and townhouses, located within a 500 m radius of the Subject Lands. These similar-density housing forms exist to the west and to the southeast of the Subject Lands.

Several large parks, trails, and recreational spaces are in proximity of the Subject Lands, including River East Optimist Park and Kiwanis Park to the southeast, Fairmont Park to the northeast, and Pottersburg Park, Meadowlily Trail, and a golf course to the south. East Park London is also located approximately 1 kilometre southeast of the Subject Lands. The Subject Lands' proximity to parkland provides future



residents of the proposed development with access to ample recreation opportunities. Additionally, there are commercial uses to the west of the Subject Lands, and several institutional uses located in proximity to the Subject Lands, including an early childhood centre and two schools within walking distance. The proposed development would also be well-serviced by transit, as the Subject Lands are within a short walking distance to several bus stops.

3 Development Overview

The original development concept involved the demolition of the existing single-detached dwelling and accessory garage to construct two 3.5-storey mid-rise apartment buildings with twenty (20) units each, for a total of 40 residential units and 40 parking spaces. The original concept had a density of 73 units per hectare (uph). This was the version of the conceptual site plan that was presented to City staff at the pre-consultation meeting held in 2022.

Since the 2022 pre-consultation, the Client has made several modifications to the original concept as per City staff request. The updated development proposal includes the demolition of the existing single-detached dwelling and accessory garage on the Subject Lands for the construction of 8 townhouses, and one street-facing 3.5-storey stacked townhouse complex comprising 16 units. This concept yields a total of 24 residential units, for a density of 44 uph. Twenty-five surface parking spaces are provided, in addition to 8 driveway spaces and 8 garage spaces for the townhouses. As part of the 25 surface parking spaces, 3 are visitor parking spaces and 1 is an accessible parking space. Three bicycle parking spaces will also be provided.

There is one proposed access onto the property from Gore Road. The updated conceptual site plan is shown in **Figure 2** below and attached as **Appendix A** for greater legibility.



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3 Development Overview

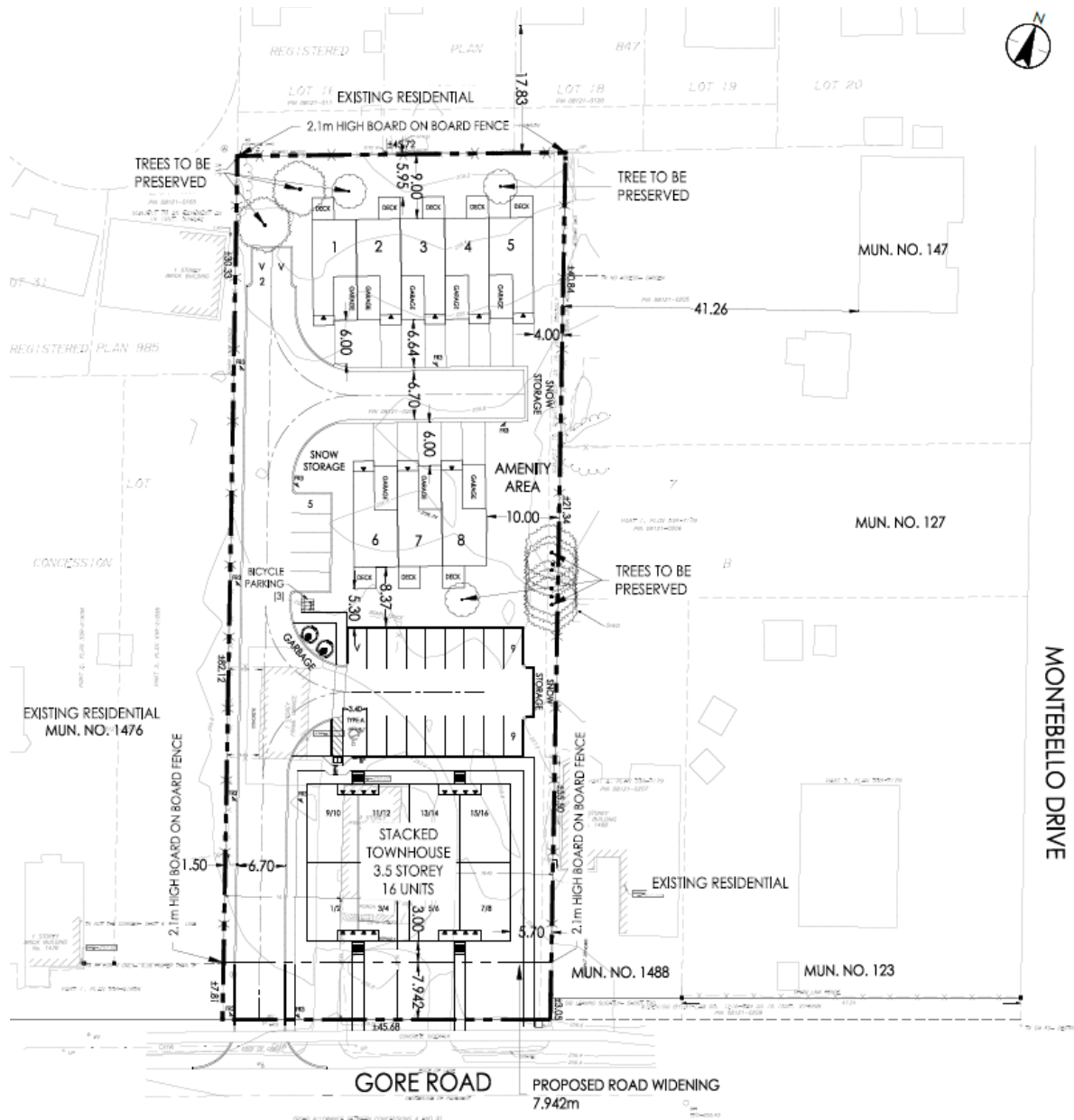


Figure 2: Development Concept – Preliminary Site Plan, Most Updated Version (September 2024)

The proposed development will bring a wider range of housing options and choice to a community of primarily single-detached homes. The updated site concept represents a gentler form of density and intensification than the one originally proposed in 2022, with greater consideration for the existing neighbourhood character. Front elevations for the townhouses are shown in **Figure 3**, while the front elevation for the street-facing stacked townhouses is shown in **Figure 4** below. For visualization purposes, building elevations for the townhouses and stacked townhouse complex are attached as **Appendix B**.



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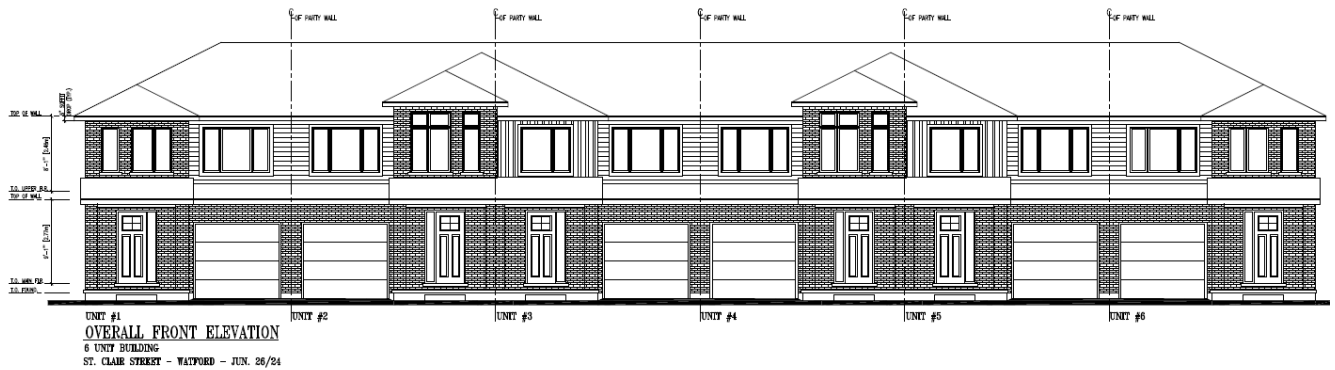


Figure 3: Front elevation for the proposed townhouses

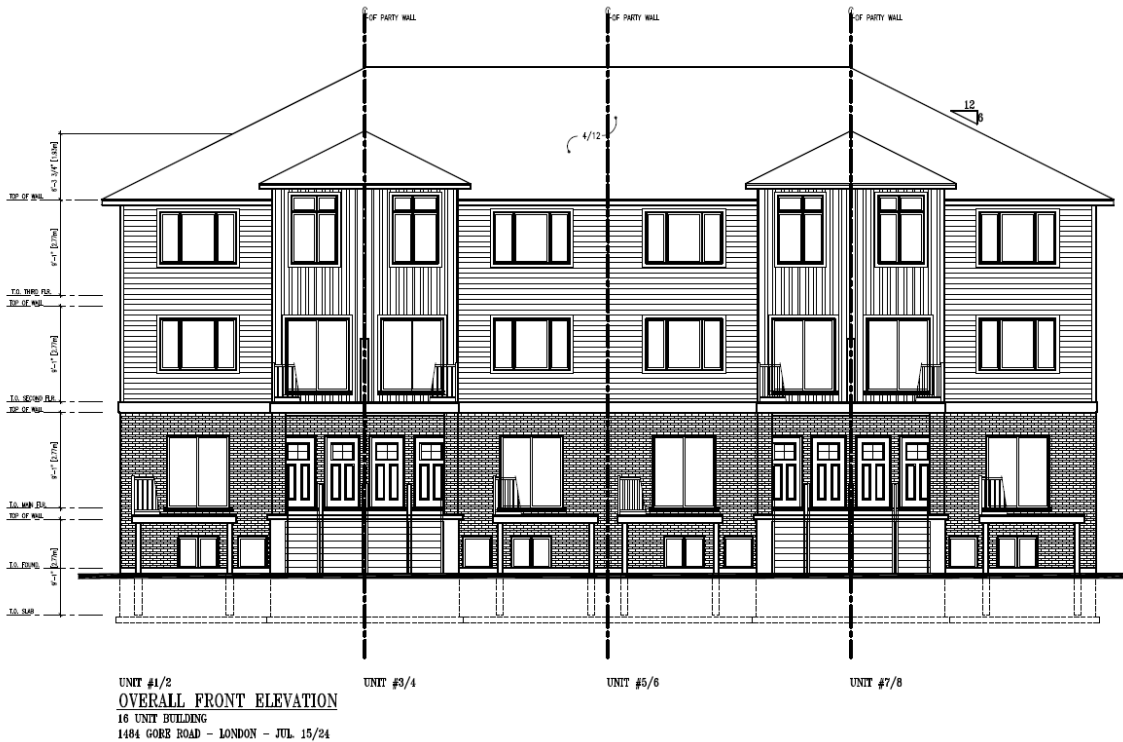


Figure 4: Front elevation for the street-facing stacked townhouses, facing Gore Road

The final Site Plan and detailed design of the proposed development will be confirmed during the Site Plan Approval process once the Subject Lands have been appropriately rezoned for the proposed development. The updated preliminary site plan attached as **Appendix A** is strictly for illustration and discussion purposes.



3.1 Project History

The original development concept involved the construction of two 3.5-storey mid-rise apartment buildings with 20 units each, for a total of 40 residential units and 40 parking spaces (**Figure 5**). The original concept had a density of 73 units per hectare (uph). This was the site plan version that was presented to City staff at the pre-consultation meeting held in 2022.

Staff requested amendments to the original concept plan presented, citing concerns regarding density and compatibility with the existing neighbourhood character, the location and number of on-site parking spaces, as well as the location and orientation of the proposed amenity space. The Client has worked closely with the City to address Staff concerns and comments. Since the 2022 pre-consultation meeting, the original concept plan has undergone three major revisions, leading to the creation of multiple different site layout options. The proponent is confident that the site layout shown in the most recent, up-to-date concept (**Figure 2**) sufficiently addresses Staff concerns. Compared to the original development concept (**Figure 5**), the most updated version of the development concept (**Figure 2**) demonstrates:

- Gentler forms of density through intensification than the original concept, making it more compatible with the existing neighbourhood character;
- Better transition between housing forms with different densities, with the highest density housing form (i.e., stacked townhouses) facing a Civic Boulevard road, and lower density housing forms (i.e., townhouses) situated toward the back of the lot, close to other single-detached dwellings north of the Subject Lands. This creates a density gradient, providing a transition from higher density housing forms to surrounding lower density housing;
- A reduction in the number of off-street parking spaces, which are appropriately screened from the street;
- A greater mix and range of housing types, which provide a greater diversity in built form, with more choices for residents in terms of unit sizes, types, and price points;
- A more centralized amenity space, providing a more accessible focal point and gathering place for future residents of the proposed development to enjoy. The amenity space is also appropriately screened from the road for public safety;
- A more pedestrian friendly development, with the stacked townhouse complex oriented toward the street – providing a more interesting streetscape for passerby pedestrians along Gore Road; and
- The most up-to-date measurements for the proposed road widening.



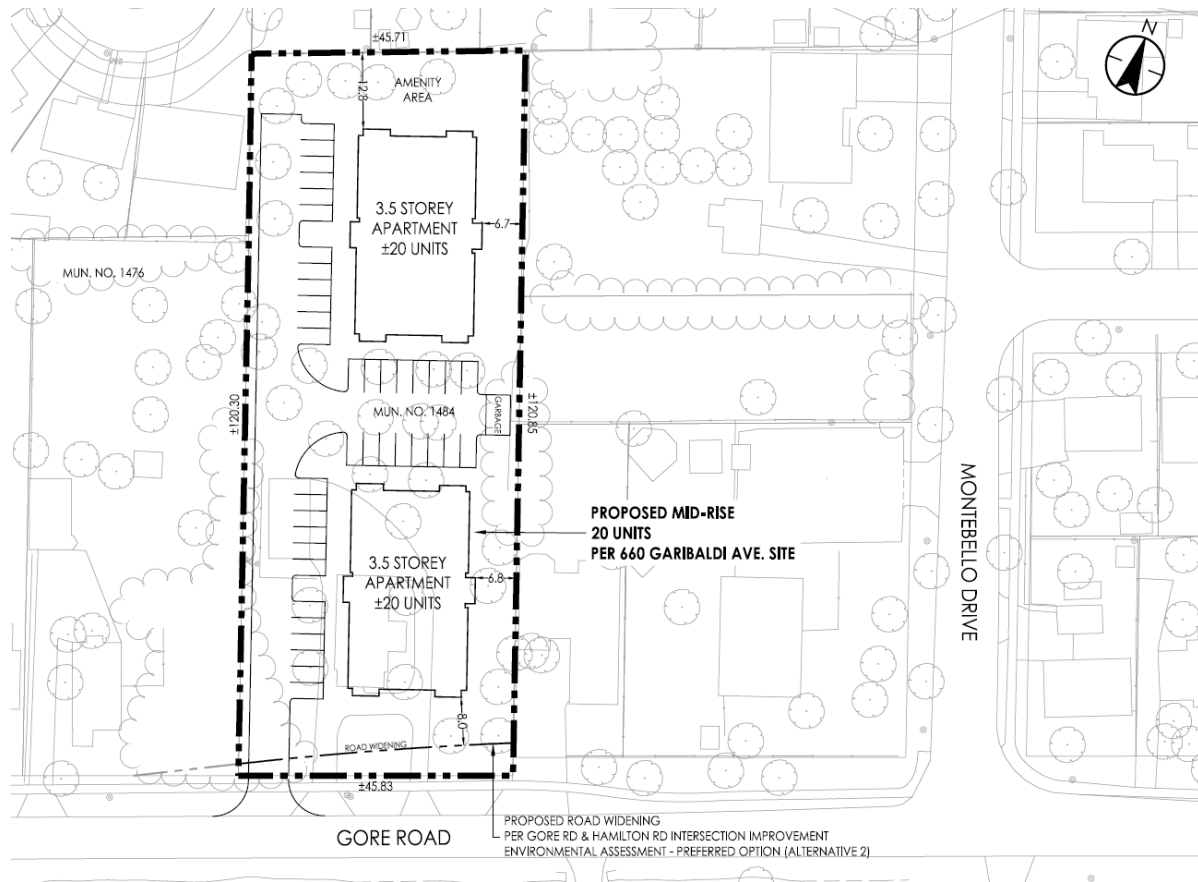


Figure 5: Original Development Concept Presented at the Pre-Consultation Meeting (October 2022)

3.1.1 Response to Public Comments

On August 27, 2024, a Public Open House/Community Information Meeting was held as an opportunity for the public to provide their comments and input on the proposed development. **Figure 6** shows the version of the site plan that was presented to the public during the Public Open House/Community Information Meeting, while **Figure 2** represents the subsequent, amended version of the site plan – which incorporates community feedback/comments from the Public Open House. **Table 1** below provides a summary of the written comments/feedback received from the Public Open House, as well as the ways in which the proponent has incorporated this feedback into the most recent version of the proposed site plan (**Figure 2**). The amendments consist mainly of site layout adjustments to address privacy concerns, as well as the addition of a few more parking spaces to address parking concerns.



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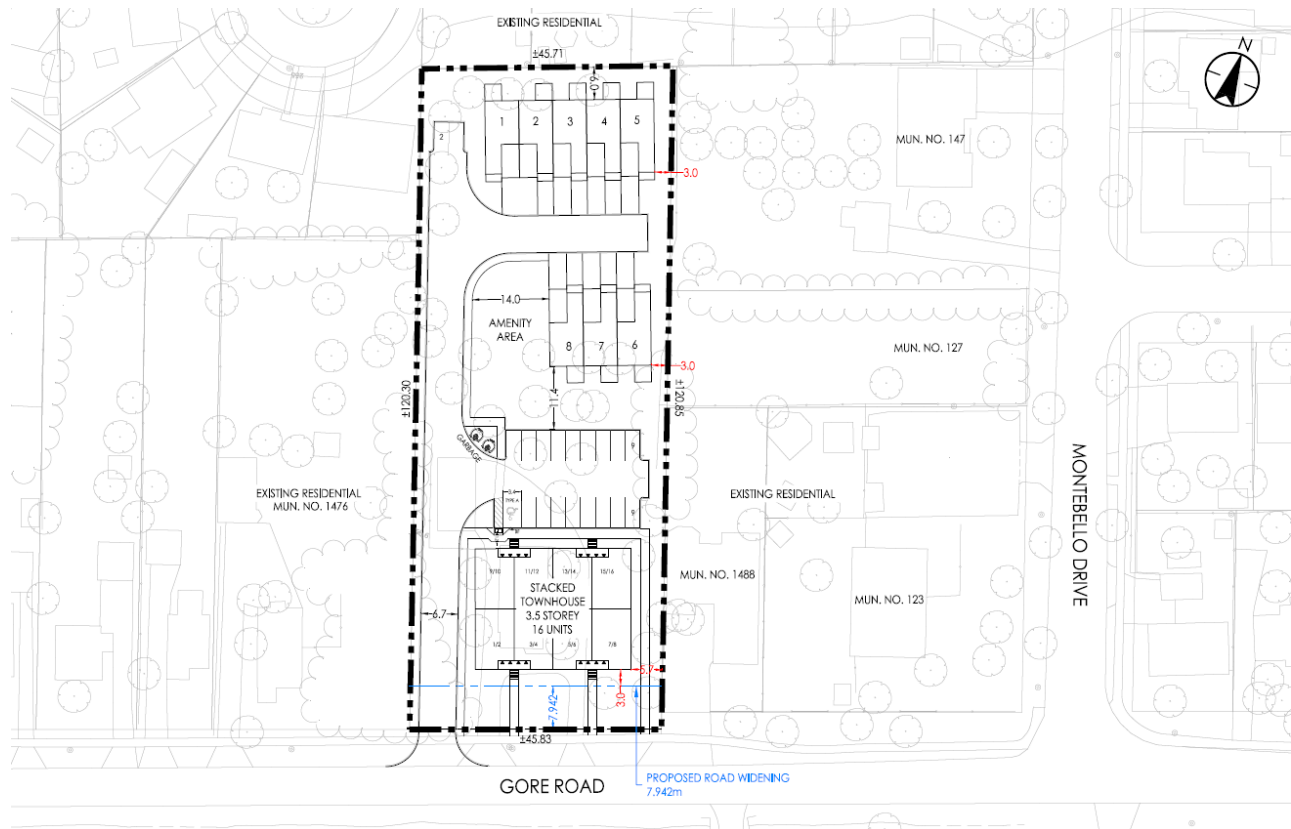


Figure 6: Development Concept Presented to Public During Community Information Meeting Held on August 27, 2024. This is the August 2024 Version of the Conceptual Site Plan, which Addresses City Staff Comments/Concerns.

Table 1: Summary of Public Comments from Community Information Meeting Held on August 27, 2024, and Corresponding Amendments Made to Site Plan.

Theme	Public Comments	Corresponding Amendments Made to Site Plan
Privacy/Screening	<ul style="list-style-type: none"> Large, mature trees along property boundaries should be maintained, as they provide ample screening. Replacement of these mature trees with new trees will not provide the same level of privacy screening. Townhouses are too close to adjacent properties – especially along the north and east property lines. Insufficient side yard setbacks. Concerns about new residents in townhomes being able to look into neighbors’ homes and backyards. 	<ul style="list-style-type: none"> Pushing units 1 through 5 south 3m to provide additional space from the existing residential to the north. Pushing units 6 through 8 to the west to provide additional space from the existing residential to the east. With the shift of these units there is potential to preserve the trees in the northwest corner of the site and along the east property limit to provide additional privacy screening.



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	<ul style="list-style-type: none"> • Six-foot fence is not tall enough to provide sufficient privacy screening for adjacent properties. • Would like fence to be taller and for the boards to be tight, to prevent vehicle headlights from shining through to neighbouring properties 	<ul style="list-style-type: none"> • A 2.1m (7ft) board (tallest fence per by-law) on board fence provided along the perimeter of the site to provide additional privacy screening. • Amenity area has been moved to the other side of the lot (still in a central location) to provide a greater buffer between the townhouses, and the existing residential dwellings to the east of the Subject Lands, to provide greater privacy screening for neighbours.
Neighbourhood Character	<ul style="list-style-type: none"> • Neighbourhood currently consists of mostly single-detached bungalows. Proposed development does not reflect neighbourhood character. • Round-about development and new housing happening at the same time takes away from the neighbourhood character. • Would be nice to have the exterior of the buildings match the houses in the area and not look too modern, so that the charm of the neighbourhood can be kept • The townhomes do not fit the character of the neighbourhood, the proposed buildings are too tall. The proposed townhouses should be bungalows instead to fit the character of the neighbourhood. Units should be 2-storeys maximum to fit the neighbourhood character of the area. 	<ul style="list-style-type: none"> • See Planning Justification and Project History sections of this report.
Traffic and Noise	<ul style="list-style-type: none"> • Concerned about the amount of traffic down the access road at all hours of the day. • Concerns about increased traffic and noise generated from an influx of people moving into the area. • Traffic volumes are already too high for the area. How will the added traffic volumes be taken into account for the proposed round-about? 	<ul style="list-style-type: none"> • Additional review and efforts have been made to preserve more mature trees on the lot. A 2.1m (7ft) board (tallest fence per by-law) on board fence will also be provided along the perimeter of the site. Both measures will help buffer some of the noise that existing residents are concerned about. • See Planning Justification and Project History sections of this report.
Parking	<ul style="list-style-type: none"> • There is not enough parking to accommodate the number of units. Most homeowners have at least 2 cars per household as London is not a transit friendly city. There are no "visitor" spots allocated. Concerns about overflow of cars 	<ul style="list-style-type: none"> • 5 additional parking spaces provided next to unit 6.



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	into surrounding neighbourhood due to insufficient parking.	
Schools	<ul style="list-style-type: none"> Schools in neighbourhood are already over capacity. 	<ul style="list-style-type: none"> Cannot be addressed through site plan. This must be addressed by the school board and City. The school board is an agency that the City typically circulates planning applications to.
Density	<ul style="list-style-type: none"> Neighbour on Niagara St. is supportive of development. Density is suitable for the lot size. More housing is needed in London, and there are limited opportunities for infill redevelopments like this. Some other neighbours on Fundy Ave are concerned about density. One neighbour has concerns about density for the amount of land available, with concerns about noise, parking, and privacy. The proposed density is inappropriate for London, this is not Toronto. 	<ul style="list-style-type: none"> See Planning Justification and Project History sections of this report.
Trees and Landscaping	<ul style="list-style-type: none"> Would like to see more green space and trees along property lines as a buffer for noise. Neighbour liked the positioning of the buildings and where the laneway (access) is, and appreciates the proposed planting of bushes along the property line, which will help provide screening from vehicle headlights A treeline of mature trees, not saplings, should be planted along the perimeter of the proposed development (to provide privacy) 	<ul style="list-style-type: none"> Pushing units 1 through 5 south 3m to provide additional space from the existing residential to the north. Pushing units 6 through 8 to the west to provide additional space from the existing residential to the east. With the shift of these units there is potential to preserve the trees in the northwest corner of the site and along the east property limit to maintain privacy screening, and to provide buffer for noise.
Construction & Safety	<ul style="list-style-type: none"> Construction will make traffic worse. Detours will bring more cars from Gore Road into the surrounding neighbourhoods/subdivision. This will be a hazard for neighbourhood kids and pedestrians, and it will be a safety concern for kids coming home from school. 	<ul style="list-style-type: none"> Signage will be provided during construction, and all efforts will be made to ensure community/public safety in accordance with City standards & by-laws.



4 Land Use Policy Framework

Planning policies exist within a hierarchy of plans directed by the Ontario Planning Act. **Figure 7** provides an overview of the current hierarchy for planning policies that are relevant for the proposed development. There are several additional frameworks which exist in parallel to the planning policies and legislation shown below. As such, this list is not exhaustive, but rather provides an overview with respect to the primary planning policies applicable to this development proposal.

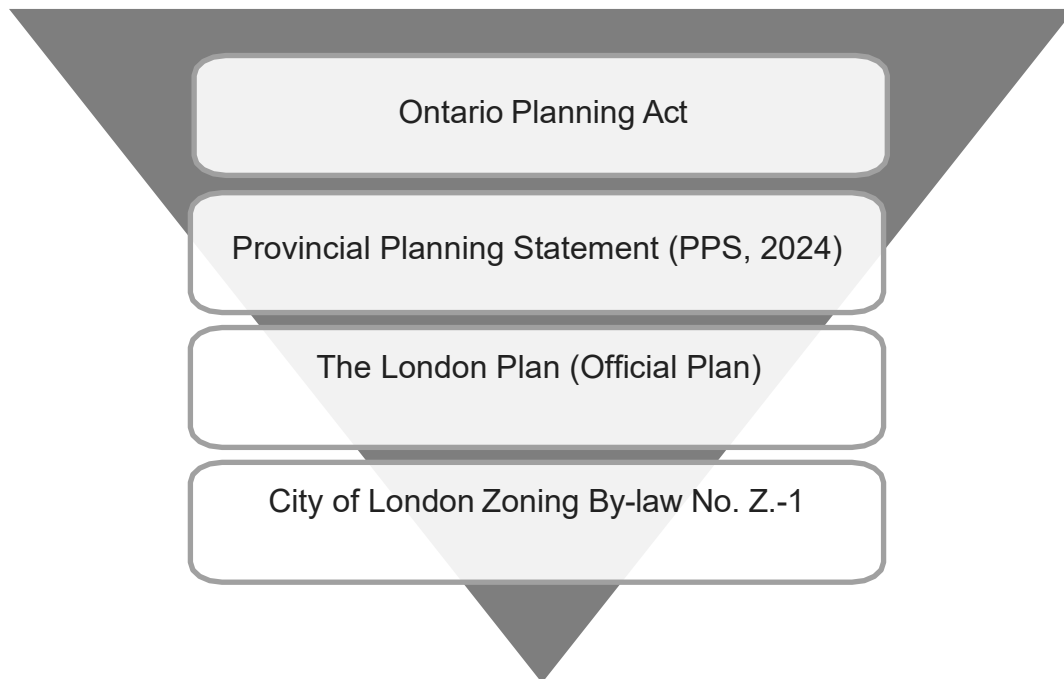


Figure 7: Planning Framework Hierarchy

4.1 Provincial Planning Statement (PPS, 2024)

On October 20, 2024, the new Provincial Planning Statement, 2024 (PPS, 2024) came into effect, issued pursuant to Section 3 of the Planning Act. The Planning Act requires all land use planning matters “be consistent” with the PPS. The new PPS, 2024 replaces the Provincial Policy Statement, 2020 (PPS, 2020) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan). The merging of these planning documents creates a comprehensive, streamlined provincial planning document to guide matters related to land use planning. The PPS, 2024, contains several new and updated policies, and places a greater emphasis on generating housing supply..

As per Schedule 1 of the PPS, 2024, the City of London has been identified as a Large and Fast-Growing Municipality. Municipalities included in this list are anticipated to experience significant growth, and as such, are expected to accommodate higher density development and more compact built forms. The new



PPS, 2024, encourages Large and Fast-Growing Municipalities to plan for a target of 50 residents and jobs per gross hectare in designated growth areas (S.2.3.1.5). In the PPS, 2024, designated growth areas include lands which are designated and available for residential growth.

To support the achievement of complete communities, the PPS, 2024 states that planning authorities should accommodate an appropriate range and mix of land uses, housing options, employment, public service facilities and other institutional uses, recreation, and parks and open spaces to meet long-term needs (S.2.1.6.a). The PPS asserts, that the improvement of social equity and the overall quality of life for people of all ages, abilities, and incomes, is also important for the achievement of complete communities (S.2.1.6.c). The Province supports the development of a full range of housing options that address emerging demands from demographic changes and new employment opportunities (S.2.2.1.b.1).

PPS, 2024 policies require the facilitation of residential intensification, and the introduction of new housing options within previously developed areas (S.2.2.1.b.2). It supports redevelopment that results in a net increase in residential units (S.2.2.1.b.2), for the achievement of complete communities that provide a range and mix of housing options (S.2.3.1.3). Land use patterns within settlement areas should be based on densities and a mix of land uses that efficiently uses land and resources, optimizes existing and planned infrastructure and public service facilities, and that are transit-supportive (S.2.3.1.2). Other PPS, 2024 policies reflect previous PPS, 2020 policies by prioritizing intensification on lands in proximity to transit, including near corridors and stations (S.2.2.1 d).

To this end, the proposed development will introduce multi-residential housing to a previously developed neighbourhood that comprises a range and mix of other land uses. In doing so, the proposed development will provide more housing options and choice for residents, and it will support the achievement of a complete community. The proposed redevelopment of the Subject Lands would result in a net increase of residential units (S.2.2.1.b.2), and it would optimize the use of existing infrastructure, public service facilities, and resources in the area. The proposed development would be transit-supportive, and would optimize existing transit investments, as the Subject Lands are situated on an existing bus route. Furthermore, the proposed development will have consideration for different household sizes and incomes, by offering units of different sizes and at various price points. This will improve social equity by catering to the dynamic needs of a diverse population. A greater variety of unit sizes and price points will make the neighbourhood more accessible to people of different ages, abilities, and incomes.

Based on these considerations, it is our professional opinion that the proposed residential redevelopment as part of this ZBA application, is consistent with the policies of the PPS, 2024.

4.2 Local Planning Framework

4.2.1 The London Plan (Official Plan)

The London Plan (Official Plan) regulates the extent, type, and pattern of development within the City, and provides direction regarding the management of resources and land use in efforts to achieve and maintain a high quality of life for residents. The following policy review is based on the May 2023



Consolidation of the London Plan. The proposed development conforms to the general intent of the London Plan and its applicable Place Type policies. The Subject Lands are contained within the 'Neighbourhoods' Place Type, according to Map 1 – Place Types in the London Plan (**Figure 8**).



Figure 8: The London Plan Map 1 – Place Types

The London Plan envisions the Neighbourhoods Place Type to be vibrant, exciting places to live that support aging in place, with attractive streetscapes, well-connected neighbourhoods, easy access to daily goods and services within walking distance, and a diversity of housing choices for increased affordability(916_).

Within the Neighbourhoods Place Type, segregation of different housing types, intensities, and forms is to be avoided, and neighbourhoods are to be planned for a diversity and mix of housing (918_2). Appropriate levels of intensification are to be accommodated in efforts to support local businesses, enhance physical and social health, and create dynamic, lively, and engaging places to live (918_13). However, the London Plan states that intensification will need to respect the existing neighbourhood character (918_13).

To achieve the vision of the Neighbourhoods Place Type, the range of permitted uses on a given property, and the intensity of development allowed, is dependent on the classification of street onto which the property has frontage (919_2). The London Plan states that the general intent of taking such an approach is to balance neighbourhood stability with the goal of creating neighbourhoods that allow for



different housing types, an appropriate mix of uses, affordability, aging in place, and vibrant, interesting communities (919_6). The Subject Lands have frontage onto Gore Road, which is classified as a Civic Boulevard according to Map 3 – Street Classifications in the London Plan. As per Table 10 and Table 11 in the London Plan, townhouses and stacked townhouses (as proposed – see **Figure 2**) up to a standard maximum height of 4 storeys are permitted on properties fronting onto Civic Boulevards.

Residential intensification has been identified as a crucial part of achieving the vision and key directions of the London Plan (937_). In efforts to support aging in place, diversity of built form, affordability, vibrancy, and the effective use of land in neighbourhoods, the London Plan encourages intensification within existing neighbourhoods (937_). However, the London Plan states that intensification should add value to neighbourhoods by adding to their planned and existing character, while ensuring that the proposed intensification is appropriate for its neighbourhood context (937_). Within the London Plan, residential intensification is defined as *‘the development of a property, site, or area at a higher residential density than currently exists’* (938_).

Intensification may take various forms, as long as one or more residential units are added to a site (938_). In the London Plan, redevelopment, which involves *‘the removal of existing buildings in favour of one or more new buildings that house a greater number of dwelling units than what currently exists’* (939_6), is considered to be one form of intensification. Within the Neighbourhood Place Type, intensification is supported where it is appropriately located and fits well into the neighbourhood context in which it is situated (940_).

With respect to intensification policies in the Neighbourhood Place Type, the proposed redevelopment of the Subject Lands would increase the diversity and vibrancy of built form, while offering opportunities for aging in place through smaller unit sizes. By offering a variety of housing forms with various unit sizes, the proposed development may increase affordability by providing housing options at different price points. The proposed redevelopment represents a more effective use of land in an existing neighbourhood by providing more residential units and options on a lot that is currently underutilized. In response to City Staff comments, numerous revisions have been made to the original development concept. Upon addressing Staff concerns, the applicant is of the opinion that the newest development concept (**Figure 2**) represents gentle density and intensification, such that the proposed redevelopment is appropriate for the existing neighbourhood. This gentle density would effectively balance neighbourhood stability and existing character, with the introduction of new housing types for greater affordability and mix.

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

The Subject Lands are zoned Residential R1-6 under the current City of London Zoning By-law No. Z.-1 (as shown in **Figure 9**). The R1 Zone is the most restrictive residential zone, which only permits and regulates single detached dwellings. The R1-6 Zone variation is applied to most suburban single dwelling developments in the City (S.5.1).

As the proposed residential uses (i.e., townhouses and stacked townhouses) are not permitted in the current zone, a Zoning By-law Amendment (ZBA) is required to facilitate the proposed development. As



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4 Land Use Policy Framework

part of this ZBA application, the R5-6 Zone is proposed for the Subject Lands, with special provisions as detailed in Section 5.1 of this report.

The R5 Zone provides for and regulates medium density residential development in the form of cluster townhouses. Different intensities of development are permitted in the R5 Zone, ranging from 25 uph to 60 uph depending on the zone variation (S.9.1).

The R5 Zone permits the following uses:

- Cluster townhouse dwellings; and
- Cluster stacked townhouse dwellings.

While 'cluster townhouse' and 'cluster stacked townhouse' are not defined within the Zoning By-law Z.-1, the following definitions are provided for 'Cluster Housing', 'Stacked Townhouse', and 'Townhouse'. Together, these definitions may define the permitted uses.

"CLUSTER HOUSING" means a group or groups of dwelling units which may be in various forms, and so located on a lot that each dwelling unit may not have legal frontage on a public street or road and more than one dwelling unit may exist on one lot.

"STACKED TOWNHOUSE" means a building designed to contain three or more dwelling units attached side by side, two units high, with each dwelling unit having a private entrance to grade level and a private open space area of any upper unit may utilize a portion of the roof of any lower unit.

"TOWNHOUSE" means a building divided vertically into three or more attached dwelling units by common walls extending from the base of the foundation to the roof line, each dwelling unit having a separate entrance at grade, and so located on a lot that individual units may not have legal frontage on a public street.

The standard provisions of the R5-6 Zone are detailed in Section 5.1 of this report.



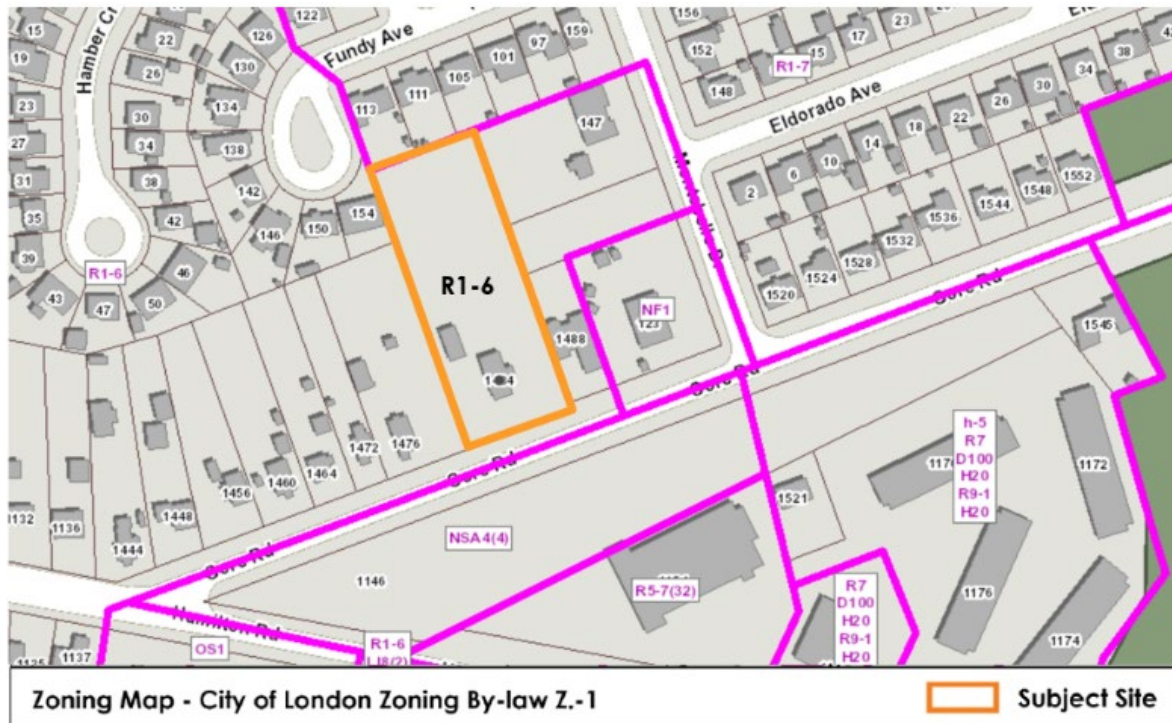


Figure 9: Interactive Zoning Map – City of London Zoning By-law No. Z.-1

5 Proposal

5.1 Zoning By-law Amendment (ZBA)

The applicant is seeking a Zoning By-law Amendment (ZBA) to rezone the Subject Lands from a Residential R1-6 Zone, to a Residential R5-6 Zone with special provisions (R5-6(X)).

The following table (**Table 2**) shows an analysis of zoning compliance for the most recent development concept, based on the proposed R5-6 Zone. Site-specific special provisions are requested for the regulations highlighted in red. As per Section 4.14 of the Zoning By-law, the road widening area is factored into the calculations for the provided landscaped open space, lot coverage, and density shown below in **Table 2**.



Planning Justification Report
5 Proposal

Table 2: Zoning Compliance Table

Regulation (R5-6 Zone)	Required	Provided	Site Specific Provision Requested
Minimum Lot Area (m ²)	1,000 m ²	5,505 m ²	No
Minimum Lot Frontage (m) (Infilling – per Section 9.3(1) in the Zoning By-law)	10.0 m	45.68 m	No
Minimum Front Yard Depth (m) (Arterial)	8.0 m	3.0 m	Yes – 3.0 m
Minimum Exterior Side Yard Depth (m) (Arterial)	N/A	N/A	No
Minimum Interior Side Yard Depth (m) (Standard Regulation)	2 Storey Townhouse – 4.0 m Stacked Townhouse – 6.5 m	4.0 m 5.7 m	No Yes – 5.5 m
Minimum Rear Yard Depth (m) (Standard Regulation)	6.0 m	9.0 m	No
Minimum Landscaped Open Space (%)	30%	41.6%	No
Maximum Lot Coverage (%)	45%	24.1%	No
Maximum Height (m)	12.0 m	13.5 m	Yes – 13.5 m
Maximum Density Units Per Hectare (UPH)	50 uph	44 uph	No
Minimum Parking			
Townhouse, Cluster: 1 per unit	16 units x 0.5 = 8	21 surface spaces	No
Townhouse, Stacked: 0.5 per unit	8 units x 1 = 8	8 driveway spaces + garage spaces	
Visitor Parking	1 space per 10 units = 3 spaces	3 surface spaces	No
Minimum Accessible Parking (4% of total parking)	4% of total surface parking = 1 space	1 Type A surface space	No
Minimum Bicycle Parking (0.1 short-term space per unit)	0.1 space per unit = 3 spaces	3 spaces	No



Based on the zoning compliance analysis provided in **Table 2**, the special provisions requested for the Subject Lands are as follows:

- A **decrease** in the minimum **front yard depth** from 8.0 m to 3.0 m;
- A **decrease** in the minimum **interior side yard depth** from 6.5 m to 5.5 m for stacked townhouse;
- An **increase** in the maximum **height** from 12.0 m to 13.5 m; and

The proposed Zoning By-law Amendment would read as follows:

R5-6(X) 1484 Gore Road

a) Regulations

- i) Front and exterior side yard depth (m) (Minimum): 3.0 m
- ii) Rear and interior side yard depth (m) (Minimum): 5.5 m for stacked townhouse
- iii) Height (m) (Maximum): 13.5 m

5.2 Planning Justification

5.2.1 Provincial Considerations

The proposed ZBA would help facilitate residential intensification through infill redevelopment and would introduce new housing options in a previously developed neighbourhood (PPS, 2024, S.2.2.1.b.2). The proposed redevelopment represents a more efficient use of land on a larger residential lot, which is currently underutilized. Such development would result in a net increase in the number of residential units provided (PPS, 2024, S.2.2.1.b.2) and would be consistent with provincial directives to establish efficient land use patterns (PPS, 2024, S.2.3.2 a). As the Subject Lands are also situated near several bus stops, schools, parks and recreational spaces, and grocery stores, the proposed redevelopment would be transit-supportive (PPS, 2024, S.2.2.1 d), and would make efficient use of planned and available infrastructure and public service facilities (PPS, 2024, S.2.2.1 c).

Under the PPS, 2024, municipalities are required to permit and facilitate all types of residential intensification, including redevelopment, to provide an appropriate range and mix of housing options and densities that will meet the projected needs of current and future residents (S.2.2.1.b.2). Further to this, provincial policies promote densities for new housing that efficiently uses land, resources, infrastructure, and public service facilities (PPS, 2024, S.2.2.1 c), as reflected in the proposed redevelopment. The proposed development would bring a greater range and mix of housing options to an established neighbourhood which currently consists of primarily single-detached dwellings, to support the achievement of a complete community (PPS, 2024, S. 2.3.1.3). It would help accommodate the dynamic needs of a diverse workforce and population within what has been identified as a large and fast-growing municipality (PPS, 2024, Schedule 1).



New PPS, 2024 policies support the achievement of complete communities. Such policies encourage planning authorities to accommodate an appropriate range and mix of land uses, housing options, employment, public service facilities, and other institutional uses, as well as recreation, parks and open spaces to meet long-term needs (PPS, 2024, S.2.1.6 a). These policies also state that complete communities can be achieved by improving accessibility (PPS, 2024, S.2.1.6 b) and overall quality of life for people of all ages, abilities, and incomes (PPS, 2024, S.2.1.6 c). To this end, the proposed development offers a wider range of housing options at various price points and unit sizes, to accommodate the needs of people with different income levels, and at different stages of their lives. Furthermore, the proposed development would be situated in an established neighbourhood with a mix of land uses and public service facilities, institutional uses, and recreation, parks, and open spaces, to support the achievement of a complete community.

5.2.2 Local Considerations

The proposed R5-6 Zone for the Subject Lands would be more consistent with the policies and general intent of the Neighbourhood Place Type within the London Plan. It would allow for the introduction of new housing forms in a neighbourhood of primarily single-detached dwellings, to provide a greater range and mix of housing (918_2) that accommodates the needs of a diverse population. In doing so, the proposed ZBA would allow for different housing types at different price points to increase affordability, and create diverse, vibrant, and interesting communities (919_6) with more compelling streetscapes and built forms. Furthermore, the wider range of housing options and choice offered by the proposed development, would provide an increased range of unit sizes in support of aging in place (919_6).

The proposed R5 Zone is one of the lower intensity medium-density zones in the City's Zoning By-law, with permitted uses being generally restricted to various forms of cluster townhouses. As such, the proposed zone and development would allow for relatively gentle forms of intensification, while adding to the existing character of the neighbourhood (937_). Through gentle density, the proposed ZBA and development would achieve balance between neighbourhood stability and predictability, with the goal of creating neighbourhoods that allow for different housing types (919_6). The site layout of the proposed development further supports these policies and objectives by providing a transition from higher density housing types (i.e., stacked townhouses) facing the Civic Boulevard road to lower density housing types (i.e., standard townhouses) toward the rear of the lot.

Generally, Neighbourhood Place Type policies in the London Plan permits medium-density forms of housing, including townhouses and stacked townhouses, on lands with frontage onto a Civic Boulevard (The London Plan, Table 10). As the Subject Lands' current R1 Zone is highly restrictive and only permits single-detached dwellings, the proposed medium-density R5 Zone would be more suitable for the Subject Lands. The proposed R5 Zone would allow for a scale and density of development that is intended for properties fronting onto a Civic Boulevard, as per Neighbourhood Place Type policies in the London Plan (The London Plan, Table 10).

The proposed R5-6 Zone would be appropriate for the neighbourhood context in which it is situated (940_), as there are several clusters of housing with similar densities, such as low-rise apartments and townhouses, located within a 500 m radius of the Subject Lands. These similar-density housing forms



exist to the west and to the southeast of the Subject Lands. Additionally, the parcel municipally known as 1154 Hamilton Road, which is located across the road and south of the Subject Lands, has recently been rezoned to the R5-7 Zone with special provisions. The proposed R5-6 Zone for the Subject Lands, with special provisions, would permit residential development at a similar scale and density as the recently approved R5-7 Zone for 1154 Hamilton Road – given that these zones belong to the same parent zone (R5).

6 Supporting Studies

Supporting studies have been completed to support the requested Zoning By-law Amendment. These studies will be provided to the City under separate cover and are summarized below.

6.1 Geotechnical Study

EXP Services Inc. prepared a draft Geotechnical Investigation report (dated October 17, 2024) for the Subject Lands to assess the subsurface conditions at multiple borehole locations. The report provides engineering guidelines to support the geotechnical design and construction of the proposed development. Specifically, it provides engineering comments and recommendations for site preparation, excess soil management, excavations, dewatering, foundations, slab-on-grade and basement construction, bedding and backfill, earthquake design considerations, low impact development, pavement recommendations, and curbs and sidewalks. Based on the findings of this report, the following was determined by EXP Services Inc.:

- Construction traffic should be minimized on the finished subgrade, and the subgrade should be sloped to promote sub-surface drainage and runoff. In the building areas where the grade will be raised, the fill material should comprise imported granular or approved onsite (excavated) material. The fill material should be inspected and approved by a Geotechnical Engineer and should be placed in maximum 300 mm (12 inch) thick loose lifts and uniformly compacted to 100 percent Standard Proctor Maximum Dry Density (SPMDD) within 3 percent of optimum moisture content. *In situ* compaction testing should be carried out during the fill placement to ensure that the specified compaction is being achieved.
- Where excavations extend into or through Type 3 soil, excavation side slopes must be cut back at a maximum inclination of about 1H:1V from the base of the excavation. Should groundwater egress loosen the side slopes of Type 3 soils, slopes of 3H:1V or flatter will be required.
- The proposed low-rise structures can generally be supported on the conventional spread and strip footings founded below the topsoil or unsuitable soils on the natural competent subgrade soils or on engineered fill.
- For footings placed on engineered fill, it is recommended that the strip footings be widened to 500 mm (20 inches) and contain nominal concrete reinforcing steel.



- It is recommended that structural fill comprises granular material, such as OPSS Granular 'B', or approved alternative material. The fill should be placed in maximum 300 mm thick lifts and compacted to a minimum of 98 percent Standard Proctor Maximum Dry Density (SPMDD).
- No special underfloor drains are required, provided that the exterior grades are lower than the floor slab, and positively sloped away from the slab. It is recommended that an impermeable soil seal such as clay, asphalt or concrete be provided on the surface to minimize water infiltration from the exterior of the building.

A more fulsome, detailed discussion of the recommendations and findings of this geotechnical study, can be found in the Geotechnical Investigation report prepared by EX Services Inc.

6.2 Stormwater Management (SWM) Report

A Stormwater Management Brief was prepared by Stantec Consulting Ltd. (dated October 16, 2024), which outlines the stormwater management (SWM) strategy for the proposed development. Based on this SWM design brief, the following was determined:

- Under the existing conditions, there is a high point in the southern half of the Site. Drainage from the northern portion of the site area flows north towards the existing residential lots along the northern boundary of the site. Drainage from the southern portion of the site flows south towards the Gore Road Right-Of-Way (ROW).
- Considering that no storm sewer outlet is available for the proposed Site, no outflows are allowed from the proposed development and all flows from the Site, up to the 100-year storm event, are required to be controlled and retained onsite.
- Runoff from rooftop and landscaped areas is considered clean and sediment/contaminant loading to runoff from these areas is anticipated to be minimal.
- Stormwater runoff from the Site will be provided with on-site water quality and water quantity controls. Water quantity control will be provided via the proposed infiltration facility under the proposed parking lot and water quality control will be provided by the proposed Oil/Grit Separator.

The details and locations of the proposed erosion and sediment control measures, the contingency plan, and inspection requirements for the proposed development will be established at the detailed design stage.

6.3 Tree Preservation Plan

A Tree Preservation/Management Plan was prepared by Stantec Consulting (October 2, 2024) to create an inventory of all existing trees on the Subject Lands. It includes an assessment of the health and condition of the inventoried trees, and identifies which trees will be protected, and which trees are slated for removal. The Tree Preservation/Management Plan also delineates the proposed locations of tree protection fencing. Of the 58 trees inventoried, 27 are proposed to be preserved/protected. As per public



request, the site layout has been modified following the Public Open House, so that additional mature trees along the site boundary may be preserved. There are also two (2) additional trees (Tree 15 & 16) in the southeast corner, which are currently slated for removal, that may be preserved if the proposed sidewalk on the east side of the lot is removed/eliminated.

It is noted that the ability to preserve these trees will ultimately depend on the site servicing and grading design for the proposed development, which will be confirmed during the Site Plan Approval process.

6.4 Archaeological Assessment Stage 1 & 2

A Stage 1 & 2 Archaeological Assessment was completed by Stantec Consulting Ltd. (report dated October 22, 2024) for the Subject Lands. The study area comprises of manicured lawn and previously disturbed areas.

The Stage 1 Archaeological Assessment provided information about the study area's geography, history, previous archaeological fieldwork, and current land conditions. It also included a desktop evaluation of the study area's archaeological potential. The Stage 1 Archaeological Assessment determined that the study area retained potential for the identification and recovery of archaeological resources. As such, a Stage 2 Archaeological Assessment was required, and it was completed on August 9, 2024. The objectives of the Stage 2 Archaeological Assessment were to document archaeological resources within the study area, and to determine whether the study area contains archaeological resources that require further assessment. However, no archaeological resources were identified during the Stage 2 survey.

As no archaeological resources were identified during the Stage 1 & 2 Archaeological Assessment of the study area, no further archaeological work is required.

7 Conclusion

Based on an analysis of the existing policy framework, supporting studies, the planning justification discussed within this report, and the recommendations provided herein, we conclude that this Planning Justification Report, along with other supporting studies, should be considered as part of a Complete Application for the Zoning By-law Amendment application. The following points provide a summary of the planning justification in support of the proposed development and ZBA application:

- The proposed development as part of this ZBA application is consistent with the PPS, 2024, as it promotes efficient, transit-supportive development and land use patterns, that optimizes existing infrastructure and public service facilities (PPS, 2024, S.2.3.1.2) within a settlement area (PPS, 2024, S.2.3.1.1). The proposed development and ZBA application would accommodate an increased range and supply of housing options through intensification and redevelopment (PPS, 2024, S.2.2.1.b.2) for a diverse workforce and population (PPS, 2024, S.2.2.1.b.1), and in support of achieving complete communities (PPS, 2024, S.2.3.1.3).



Planning Justification Report

7 Conclusion

- The proposed development and ZBA application conform to the policies of the London Plan, which promotes a diversity and mix of housing types within the Neighbourhood Place Type (918_2). The proposed ZBA would allow for an appropriate level of intensification for the planned and existing neighbourhood character (937_), in support of local businesses (918_13), diversity in built form, effective use of land, and increased housing options for aging in place (937_). The proposed development represents built form at a scale and density that is appropriate for the Subject Lands, given its frontage onto a Civic Boulevard (The London Plan, Table 10).
- The proposed development as part of this ZBA application, represents sound planning and aligns with provincial and local interests.



Appendix



Appendix A Updated Site Concept



Liability Note

The Contractor shall verify and be responsible for all dimensions. DO NOT scale the drawing - any errors or omissions shall be reported to Stantec without delay.

Design Data

Regulation	Requirement	As Shown on Plan
Existing Zone:	R1-6	
Proposed Zone:	RS-6	
Proposed Use:	Townhouse & Stacked Townhouse - 24 Units	
Site Area (m ²):	5,505 m ² / 0.550 ha	
Lot Area Minimum (m ²):	1,000 m ²	5,505 m ²
Lot Frontage Minimum (m):	10.0 m	45.68 m
Front Yard Depth (m) minimum:	8.0 m	3.0 m*
Exterior Side Yard Depth (m) minimum:	N/A	N/A
Interior Side Yard Depth (m) minimum:	2 Storey Townhouse - 4.0 m Stacked Townhouse - 6.5 m	4.0 m 5.7 m*
Rear Yard Depth (m) minimum:	6.0 m	9.0 m
Landscaped Open Space (%) Minimum:	30%	41.6%
Lot Coverage Maximum (%):	45%	24.1%
Height Maximum (m):	12 m	13.5 m*
Density - Units per Hectare Maximum:	50 uph	44 uph
Off-Street Parking - Stacked Townhouse:	16 Units x 0.5 = 8	21 surface spaces
Off-Street Parking - Townhouse:	8 Units x 1 = 8	8 driveway spaces + garage
Visitor Parking:	1 space per 10 units = 3	3 surface spaces
Accessible Parking:	4% of total surface parking = 1 space	1 surface space
Bicycle Parking:	0.1 space per unit = 3	3 spaces

* Special provisions required

Notes

- THIS IS A COMPILED PLAN AND SHOULD NOT BE CONSIDERED A PLAN OF SURVEY.
- ONTARIO BASE MAPPING USED FOR AREAS AND DIMENSIONS. LEGAL PLAN REQUIRED FOR PRECISE CALCULATIONS.
- CONCEPT PLAN IS PRELIMINARY AND HAS NOT BEEN REVIEWED BY THE CITY.
- ZONING BY LAW AMENDMENT MAY BE REQUIRED.

Revision	By	Appd.	YY.MM.DD
1. FOR ZBA APPROVAL Issued	RT	BB	24.11.18

File Name:	RT	BB	RT	24.11.18
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Client/Project
RICHFIELD CUSTOM HOMES

1484 GORE ROAD

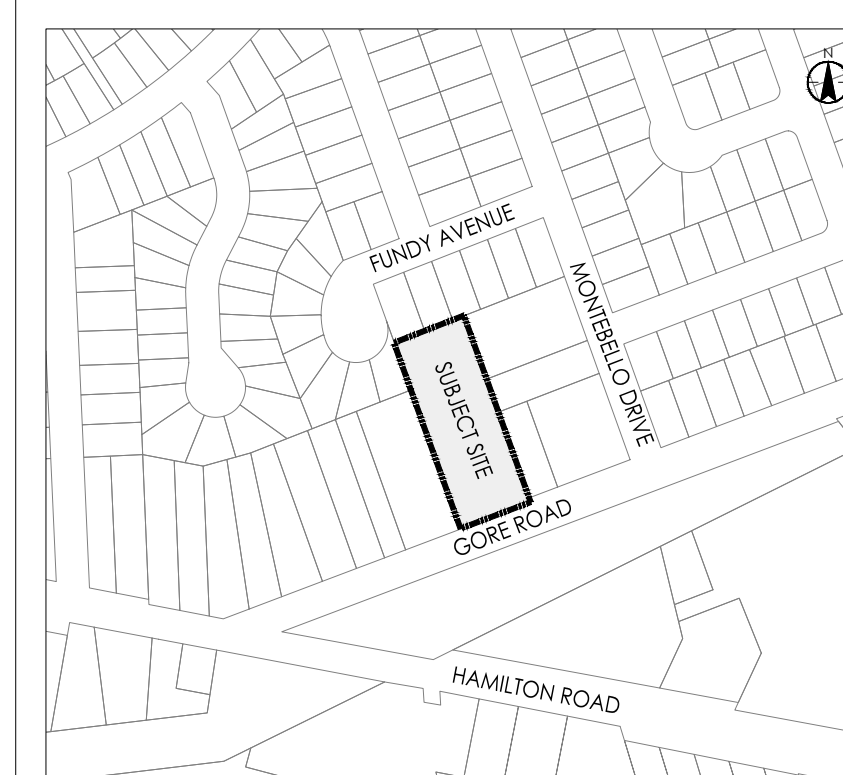
London, ON Canada

Title
SITE PLAN

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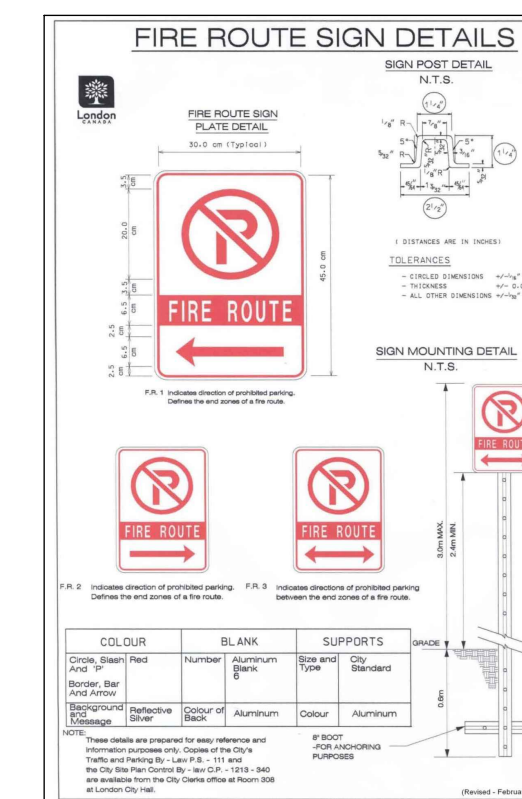
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KEY PLAN N.T.S.

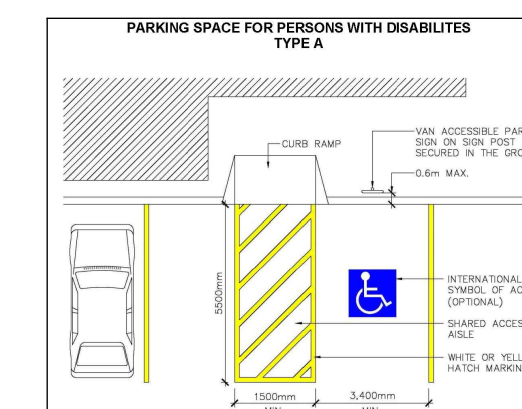


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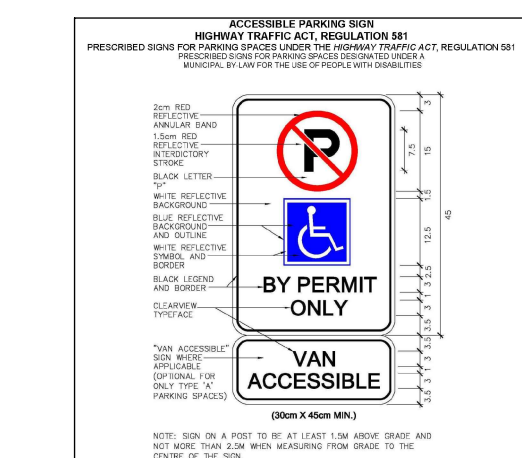
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- CONTOUR
- FIRE ROUTE
- ▬ PROPOSED FENCE
- ▼ BUILDING ENTRANCE
- FR3 FIRE ROUTE SIGN
- BF ACCESSIBLE PARKING SIGN



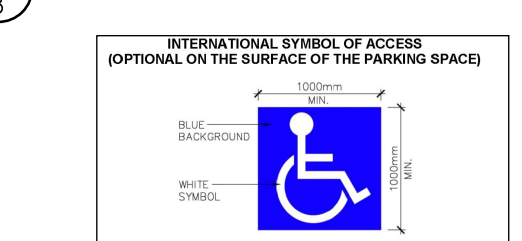
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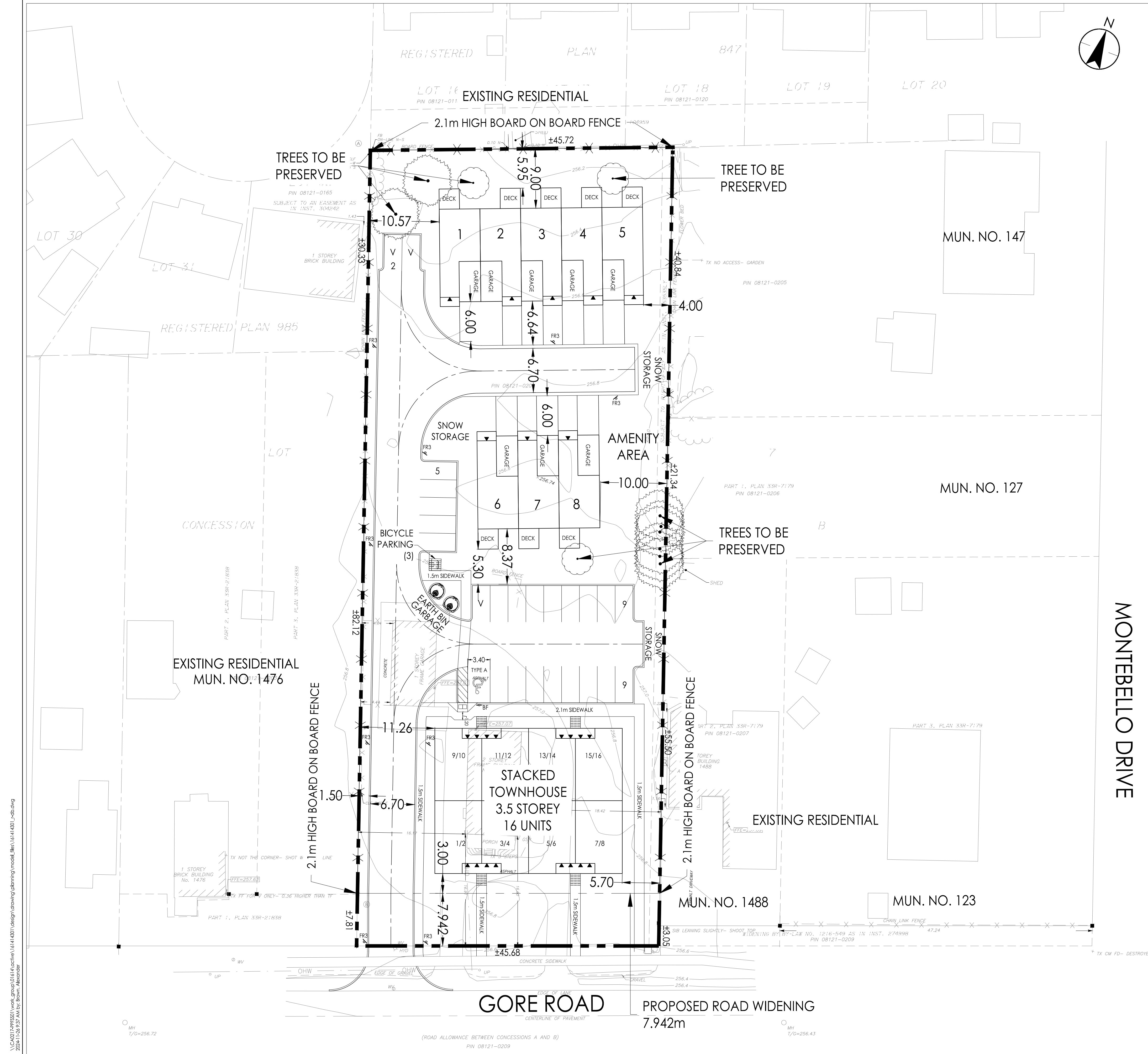
ACCESSIBLE PARKING - TYPE A



ACCESSIBLE PARKING SIGN



ACCESSIBLE PARKING SURFACE MARKING

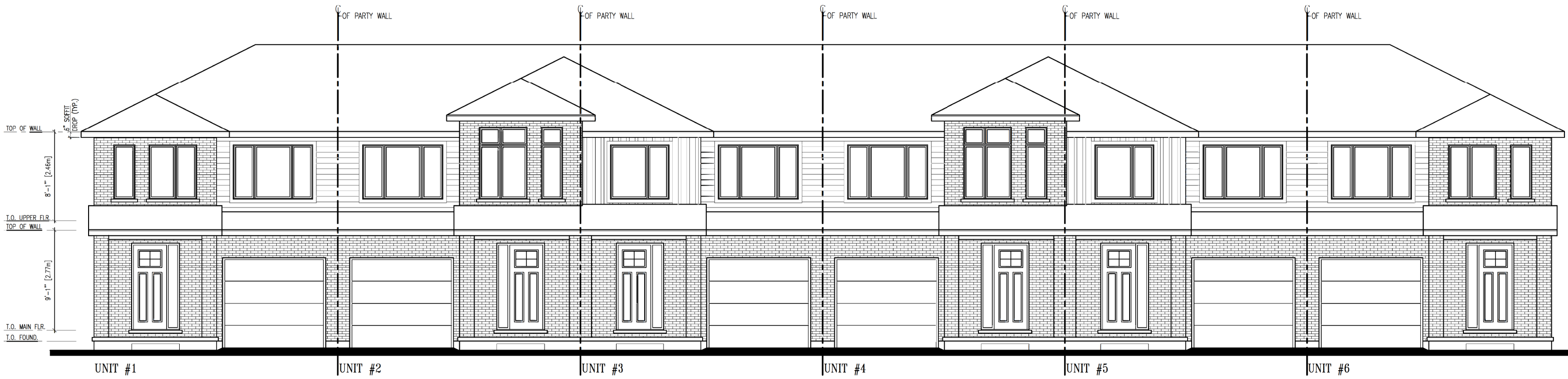


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 ORIGINAL SHEET - ANSI D

Appendix B Building Elevations

B.1 Townhouses





FRONT ELEVATION

Standard Townhouse

B.2 Stacked Townhouses





UNIT #1/2
OVERALL FRONT ELEVATION
 16 UNIT BUILDING
 1484 GORE ROAD - LONDON - JUL. 15/24

UNIT #3/4

UNIT #5/6

UNIT #7/8



Stantec is a global leader in sustainable architecture, engineering, and environmental consulting. The diverse perspectives of our partners and interested parties drive us to think beyond what's previously been done on critical issues like climate change, digital transformation, and future-proofing our cities and infrastructure. We innovate at the intersection of community, creativity, and client relationships to advance communities everywhere, so that together we can redefine what's possible.

