

**BLOCK 34, 33M-845  
SUMMERSIDE PH19; CITY FILE  
NO.39T-92020\_19)  
PLANNING JUSTIFICATION AND DESIGN REPORT**

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## 1.0 INTRODUCTION

This Planning Justification & Design Report (PJR) is being submitted by Drewlo Holdings Inc. in support of an Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) for the block known as Block 34, 33M-845, otherwise known as Phase 19 Summerside (City File No. 39T-92020\_19). A draft municipal address has been provided, being 1622 Evans Boulevard.

This application is being submitted to facilitate the development of low-rise apartment buildings as well as cluster and stacked townhomes, intended for use as purpose-built rental residential units.

A site plan application is being submitted concurrently. The proposed development consists of 174 units in the form of two (2) low-rise apartment buildings, being 6 storeys in height, totaling 124 units; two (2) blocks of 3-storey stacked townhouses, and five (5) blocks of 3-storey cluster townhouses, totaling 50 units. The proposed development is consistent with the intentions of the area, as well as Provincial and Municipal policies.

### 1.1 OVERVIEW

The Block, municipally referred to as 1622 Evans Boulevard is flanked by Highbury Ave South to the west, Evans Boulevard to the east, the Summerside Shopping Centre to the north, and future medium-density residential development to the south. The parcel is mostly rectangular in shape with an approximate frontage of 93.00m (305.13ft) along Evans Boulevard. The Site is 2.13ha (5.26ac) in size.

The subject property is within the Neighbourhoods Place Type of the London Plan, fronting a Neighbourhood Connector, which allows for a variety of land uses ranging from single detached dwellings to townhouses. An Upper Maximum Height of 3 storeys is permitted. The lands are currently zoned h1\*R6-5\*R8-4.

An Official Plan Amendment (“OPA”) as well as a Zoning By-law Amendment (“ZBA”) are being sought to amend the City of London’s Zoning (Z.-1) by-law and the London Plan to permit the proposed development.

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## 2.0 PLANNING FRAMEWORK

### 2.1 THE LONDON PLAN

Block 34 is located within the Neighbourhoods Place Type, with frontage along a Neighbourhood Connector, and also abutting an Expressway. Majority of lands surrounding the Block are also within the Neighbourhoods Place Type, with the exception of lands to the north, which are within the Shopping Area Place Type.

The London Plan indicates that Neighbourhoods are intended to provide a diversity and mix of housing types, intensities and forms. The use, form and height permitted within a Place Type are governed by the classification of the street to which the property has frontage. As shown on Map 3: Street Classifications, Block 34 has frontage onto a Neighbourhood Connector – namely, Evans Boulevard. The property is also bordered by Highbury Avenue South – an Expressway.

Current permissions of Table 10 and 11 of the London Plan for properties with frontage onto a Neighbourhood Connector, located outside of Central London, permit single detached, semi-detached, duplex, converted dwellings, townhouses, ARU's, home occupations, and group houses up to a Maximum Height of 3 storeys.

On September 25, 2024 City of London Council approved amendments to the London Plan. These amendments are currently posted for consultation on the Environmental Registry of Ontario, and are subject to approval by MMAH before they come into force and effect. These changes would introduce stacked townhouses as a permitted use across the City, and introduce apartment buildings as a permitted use within the Primary Transit Area. This amendment also increased the permitted heights; allowing up to 4 storeys, maximum, within the Primary Transit Area.

It is noted that under the current framework, stacked townhouses as well as low-rise apartment buildings, and the proposed maximum height of 6 storeys would not be permitted. A Specific Policy Area is being requested to facilitate the proposed development. When the pending Height Changes would facilitate the desired uses without amendment, a Specific Area Policy is still needed to facilitate the desired maximum height.

The Block falls within the “Dingman Creek” subwatershed. Map 5 and Map 6 do not identify any natural heritage, hazard or resources associated with the lands.

The Site is not subject to any Specific Policies, CIPs, or Heritage protections. The Block is not part of an identified Protected Major Transit Station Areas, but is located within the Primary Transit Area – an area intended to be the focus of residential intensification.

## **2.2 ZONING BY-LAW**

Under the City of London Zoning By-law (Z.-1), the subject lands are currently zoned h-1\*R6-5\*R8-4.

The Residential R6 zone variations provide for and regulate medium density development in various forms of cluster housing from single detached dwellings to townhouses and apartments. The R6-5 variation permits the full range of housing forms up to a maximum height of 12.0m and a maximum density of 35 upha.

The Residential R8 zone provides for and regulates medium density development in the form of low-rise apartment buildings. The R8-4 variation permits apartment buildings, lodging houses, emergency care establishments and continuum-of-care facilities up to a height of 13.0m and a maximum density of 75 upha.

Block 34 is also subject to one (1) holding provisions “h-1”. The purpose of the “h-1” holding provision is to ensure mitigating measures are taken in areas which are adjacent to transportation and utility corridors. It requires the Owner to agree to follow requirements for the incorporation of appropriate noise/vibration attenuation measures into the design of the development.

A Zoning By-law amendment is being requested to facilitate additional heights and density upon the site. The proposed zoning will continue to provide for and regulate medium density development in various forms of cluster housing and low-rise apartment buildings, while implementing additional height and density permissions, reduced setbacks, landscaped open space coverage and site-specific permitted encroachments to facilitate the proposed development.

A site plan application for the Block is being submitted concurrently. As required for a complete application, a noise study will be submitted at the time of site plan. Noise attenuation measures will be included within, and implemented by, the Development Agreement. For that reason, this proposal requests that the holding provisions be removed.

## **3.0 SITE LOCATION AND SURROUNDING USES**

### **3.1 SITE DESCRIPTION AND CONTEXTUAL ANALYSIS**

Block 34 located within Plan 33M-845 known as “Summerside Phase 19” (City File 39T-92020\_19), is intended to provide a mix of housing options, units and types. The subdivision is bound by Commissioners Road East to the north, Highbury Avenue South to the west, Jackson Road to the East, and Bradley Avenue to the South. This block makes up part of the larger Summerside Subdivision which mainly features low-density, single-family homes, as well as forms of medium-density residential development.

Block 34 is located directly south of the Summerside Shopping Centre. It is bordered by existing and planned low-density residential uses to the east, and planned medium-density residential development to the south. The block is 2.13ha (5.26ac) in size, and is fully serviced.

## Adjacent Land Uses:

NORTH	Commissioners Road; existing Summerside Shopping Centre and undeveloped Shopping Area Place Type lands;
SOUTH	Block 33, slated for medium-density townhouse development (The Ironstone Building Company, SPA 23-120);
WEST	Highbury Avenue South Expressway; existing single-family residential subdivision (33M-151);
EAST	Evans Boulevard; planned low-density, single-family residential development (part of unregistered plan of subdivision 39T-2020_20).

### **3.2 SPATIAL ANALYSIS**

Lands within a 400-metre radius of Block 34 are designated for varying forms and scales of development. There is a local commercial plaza, the Summerside Shopping Centre, as well as an additional vacant lands within the Shopping Area Place Type.

Lands within 800 metres of the subject site are predominately residential. There are two (2) school blocks located within 800 metres of the site; the Summerside Public School, located at 2541 Meadowgate Boulevard, and Ecole Elementaire Catholique Saint-Jean-de-Breuf, located at 270 Chelton Road. Also within 800 metres, is the Pond Mills Square, an existing shopping centre located at 1200 Commissioners Road East.

There are multiple green spaces and City parks within 800m, such as Carroll Park, the Summerside Woods west of Evans Boulevard and Chelton Road; the Highbury Woods directly north of Commissioners Road; the Meadowlily Woods Environmentally Significant Area (ESA); the City Wide Sports Park which provides soccer fields and ball diamonds; and the Southeast Optimist Park.

Multiple unpaved walking trails are available throughout the Meadowlily Woods ESA which provide connections to the Thames Valley Parkway and other multi-use pathways, promoting active transportation within the area. There are also links to public transit within an 800-metre range of the site, with stops for London Transit Route 24 found along Meadowgate Boulevard and running through the rest of the Summerside neighbourhood. This route provides connections for residents of Summerside to West London, with important transfer points allowing for connections into North and South London as well.

### **3.3 ENVIRONMENTAL CONDITIONS**

There are no records of spills on this site nor do the previous uses suggest a potential for site contamination. A Record of Site Condition (RSC) is not required for this property.

### **3.4 ARCHAEOLOGICAL/BUILT HERITAGE**

Archaeological concerns were cleared as part of the subdivision approval process prior to plan registration.

## **4.0 DESCRIPTION OF PROPOSAL**

The proposed development consists of 174 units; consisting of two (2) 6-storey apartment buildings containing 154 units, seven (7) blocks of 3-storey cluster and stacked townhouses containing a total of 50 units, and an above ground parking structure. Blocks and buildings have been sited to ensure a consistent street-wall along Evans Boulevard, and to create a transition of height and density from east to west.

### **4.1 PRE-APPLICATION CONSULTATION**

A pre-application consultation meeting for the required OPA/ZBA was originally held July 6, 2023, with comments issued July 11, 2023. A site plan consultation meeting was held March 8, 2024 to review a revised concept that reflect comments received in relation to the original consultation meeting.

### **4.2 PROPOSED OFFICIAL PLAN AMENDMENT (OPA)**

An Official Plan Amendment (OPA) is being requested to add a Specific Policy Area to the Neighbourhoods Place Type in The London Plan, as well Map 7 of the London Plan, to facilitate the above-noted development proposal, specifically to permit low-rise apartments and stacked townhouses, up to a maximum height of 6 storeys.

#### **1622 EVANS BOULEVARD**

**\*\*Requested Specific Policy Area\*\***\_ In the Neighbourhoods Place Type at 1622 Evans Boulevard, stacked townhouses and low-rise apartment buildings up to 6 storeys in height may be permitted.

### 4.3 PROPOSED ZONING BY-LAW AMENDMENT (ZBA)

Under the City of London Zoning By-law (Z.-1), the subject lands are currently zoned h-1\*R6-5\*R8-4.

The Residential R6 zone variations provide for and regulate medium density development in various forms of cluster housing from single detached dwellings to townhouses and apartments; permitting the full range of housing forms up to a maximum height of 12.0m and a maximum density of 35 upha.

The Residential R8 zone provides for and regulates medium density development in the form of low-rise apartment buildings; permitting apartment buildings, lodging houses, emergency care establishments and continuum-of-care facilities up to a height of 13.0m and a maximum density of 75 upha.

A Zoning By-law Amendment (ZBA) is being requested to amend the density, height and setback regulations of the R6-5 zone, and/or to add cluster townhouse dwellings and amend density, height and setback regulations of the R8-4 zone.

#### **R6-5( ) 1622 Evans Boulevard**

- a) Regulations
  - i. Front Yard Depth (minimum): 1.75m
  - ii. Interior Side Yard Depth (minimum): 3.5m
  - iii. Landscaped Open Space (minimum): 25%
  - iv. Building Height (maximum): 6 storeys, 22 metres
  - v. Density (upha maximum): 85 upha
  - vi. Encroachments for open or covered but unenclosed decks or porches: unlimited, front yard
  - vii. Encroachments for balconies on other dwellings: unlimited, front yard

#### **R8-4( ) 1622 Evans Boulevard**

- a) Additional Permitted Uses
  - i. Cluster Townhouse Dwellings
- b) Regulations
  - i. Front Yard Depth (minimum): 1.75m
  - ii. Interior Side Yard Depth (minimum): 3.5m
  - iii. Landscaped Open Space (minimum): 25%
  - iv. Building Height (maximum): 6 storeys, 22 metres
  - v. Density (upha maximum): 85 upha
  - vi. Encroachments for open or covered but unenclosed decks or porches: unlimited, front yard
  - vii. Encroachments for balconies on other dwellings: unlimited, front yard



**R6-5(\_):****Municipal Street Address:** 1622 Evans Boulevard**Legal Description:** Block 34, 33M-845

	<b>Standard R6-5</b>	<b>Requested Variances</b>
Use	Single detached dwelling; Semi-detached dwelling; Duplex dwelling Triplex dwelling; Townhouse dwelling; Stacked Townhouse dwelling; Apartment buildings; Fourplex dwelling;	None
Lot Area (m <sup>2</sup> ) min.	850m <sup>2</sup>	None
Lot Frontage (m) min.	10m	None
<b>Front Yard Depth (m) Main Building/Garage (m) min.</b>	6.0m	<b>1.75m plus unlimited encroachment for open or covered by unenclosed decks or porches, and balconies on other dwellings.</b>
Rear Yard Depth (m) min.	0.4m per 1m of main building height or fraction thereof, but in no case less than...	None
<b>Interior Yard Depth (m) min.</b>	0.4m per 1m of main building height or fraction thereof, but in no case less than...	<b>3.5m</b>
Lot Coverage (%) max	45%	None
<b>Landscaped Open Space (% min.)</b>	30%	<b>25%</b>
<b>Height (m) max</b>	12.0m	<b>6 Storeys; 22m</b>
Off-street Parking min. (rate/number)	Apartment = 0.5 per unit  Townhouse = 1 per unit	None
Bicycle Parking min. (rate/number)	Apartment = 0.9 long-term; 0.1 short-term per unit  Townhouses = 0.1 short term spaces per unit	None
<b>Density (max)</b>	35 upha	<b>85 upha</b>

**R8-4(\_):****Municipal Street Address:** 1622 Evans Boulevard**Legal Description:** Block 34, 33M-845

	<b>Standard R8-4</b>	<b>Requested</b>
<b>Use</b>	Apartment buildings; Handicapped person's apartment buildings; Lodging house class 2; Stacked townhousing; Senior citizen apartment buildings; Emergency care establishments; Continuum-of-care facilities	<b>ADD - Cluster townhouse dwellings</b>
Lot Area (m <sup>2</sup> ) min.	1000m <sup>2</sup>	None
Lot Frontage (m) min.	30m	None
<b>Front Yard Depth (m) Main Building/Garage (m) min.</b>	6m plus 1m per 10m of main building height or fraction thereof above the first 3m	<b>1.75m plus unlimited encroachment for open or covered by unenclosed decks or porches, and balconies on other dwellings.</b>
Rear Yard Depth (m) min.	1.2m per 3m of main building height or fraction thereof above 3m; not less than 4.5m	None
<b>Interior Yard Depth (m) min.</b>	1.2m per 3m of main building height or fraction thereof above 3m; not less than 4.5m	<b>3.5m</b>
Lot Coverage (%) max	40%	None
<b>Landscaped Open Space (% min.)</b>	30%	<b>25%</b>
<b>Height (m) max</b>	13.0m	<b>6 Storeys; 22m</b>
(Off-street Parking min. (rate/number)	Apartment = 0.5 per unit Townhouse = 1 per unit	None
(k) Bicycle Parking min. (rate/number)	Apartment = 0.9 long-term; 0.1 short-term per unit Townhouses = 0.1 short term spaces per unit	None
<b>Density (max)</b>	75 upha	<b>85 upha</b>

Additionally, it is being requested that the holding provision (h-1) be removed. The “h-1” holding provision is applied to ensure mitigating measures are taken in areas which are adjacent to transportation and utility corridors. It requires the Owner to agree to follow requirements for the incorporation of appropriate noise/vibration attenuation measures in the design of the development.

A Noise Report has been submitted with the concurrent Site Plan application. Site Plan Approval under Section 41 of the Planning Act will ensure mitigating measures are implemented through the review/approval of associated site design drawings and an executed Development Agreement.

Removing the associated holding provision as part of this OPA/ZBA application will avoid unnecessary delay and processing in the future.

#### **4.4 SUPPORTING INFORMATION**

##### **Water**

There is an existing 250mm diameter municipal watermain located within the Evans Boulevard right-of-way along the eastern frontage of the site. There are also two (2) municipal fire hydrants within the Evans Boulevard right-of-way on the opposite (eastern) side of the road. The site is located within the Westmount / Pondmills pressure zone with a design hydraulic grade line (HGL) of 335.00m.

The subject site will require a private water service for domestic and fire flow demands. A single watermain connection is proposed for this development to avoid the requirement of premise isolation in accordance with DSRM section 7.9.5..One (1) connection to the existing watermain on Evans Boulevard is proposed via a 250x250mm cut in tee and valve. One or more private fire hydrants will be proposed within the development in accordance with City of London and OBC requirements to provide adequate fire protection coverage to the proposed units. Water valves will be constructed in standard locations in accordance with City of London requirements.

Water servicing will be further discussed in responses to the Site Pan Consultation Record, and will be detailed on civil engineering drawings and within the functional servicing report provided with the Site Plan application.

## Sanitary

There is an existing 200mm diameter municipal sanitary sewer within the Evans Boulevard right-of-way along the eastern frontage of the site. A 200mm sanitary stub at 1.0% slope has been provided to property line at southeast corner of the subject site. The subject site was included as Area 'A4' in the May 7, 2024 Sanitary Sewer Drainage Area Plan & Design Sheet by DevEng (project no. D20-035) and designated a population of 332 people.

A new 200mm diameter on-site private sanitary sewer system is proposed to service this development, which is to be connected to the existing 200mm diameter sewer stub provided for the development connected to a proposed sanitary maintenance hole within the Evans Boulevard right-of-way. The development proposes 50 townhouse units and 124 apartment units with an estimated residential population of 319 people, using a per capita flow rate of 230 L/p/day, including infiltration flow, the 2.13 ha site will produce an estimated total peak sanitary sewage rate of 3.67 L/s. The peak sewage from the proposed development is less than the allocated design sewage of 4.16L/s per Area 'A4' in the May 7, 2024 Sanitary Sewer Drainage Area Plan & Design Sheet by DevEng (project no. D20-035) and should be considered acceptable.

Sanitary servicing will be further discussed in responses to the Site Plan Consultation Record, and will be detailed on the civil engineering drawings and within the functional servicing report provided with Site Plan application.

## Storm

There is an existing 600mm dia. municipal storm sewer within the Evans Boulevard right-of-way along the eastern frontage of the site. A 600mm storm stub at 1.0% slope has been provided to property line at southeast corner of the subject site. The subject site was included as Area 'A4' in the May 7, 2024 Storm Sewer Drainage Area Plan & Design Sheet by DevEng (project no. D20-035) at a design runoff coefficient of  $C=0.65$ .

New on-site private storm sewers ranging in size from 300mm to 600mm diameter, are proposed to convey minor drainage to the existing storm outlet and are conveyed through existing municipal storm sewers ultimately reaching the existing Subdivision SWMF. The preliminary site plan results in a site imperviousness of +/- 63% ( $C=0.64$ ). Given the preliminary site plan is lower than the allowable design runoff coefficient of  $C=0.65$  (64% imperviousness), additional stormwater quantity controls are not expected to be required. Quality control is to be provided via an oil-grit separator unit given the site includes more than 30 parking stalls per DSRM Section 6.2.1.3. If the final site plan runoff coefficient exceeds a  $C=0.65$  (65% imperviousness), onsite quantity controls will be required such as underground storage and or orifice plate controls.

There is an existing 375mm dia. municipal third pipe storm sewer within the Evans Boulevard right-of-way along the eastern frontage of the site. A 300mm storm stub at 1.0% slope will be provided to the property line at southeast corner of the subject site. The subject site was included as Area 'T1' in the May 7, 2024 Third Pipe Storm Sewer Drainage Area Plan & Design Sheet by DevEng (project no. D20-035) at a design runoff coefficient of  $C=0.50$  with an  $AxC$  of 0.106 AC.

New on-site third pipe storm sewers ranging in size from 300mm to 375mm diameter, are proposed to convey minor drainage from an area with an AxC value approximately equivalent to the design of AC=0.106 to meet Subdivision water balance objectives. All drainage areas to the proposed third pipe storm sewer system are to be from a combination of rooftop and grassed yards, runoff from which can be considered “clean” for the purposes of Stormwater Control. As such, no oil-grit separator will be required at the proposed third pipe outlet.

Stormwater Management will be further discussed in responses to the Site Plan Consultation Record, and will be detailed on the civil engineering drawings and within the stormwater management report provided with Site Plan application.

## 4.5 SITE PLAN APPROVAL

In addition to the requested Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) application for Block 34, an application for Site Plan Approval has been submitted concurrently.

## 5.0 POLICY REVIEW

### 5.1 PROVINCIAL PLANNING STATEMENT, 2024 (PPS)

The proposed development is consistent with the policies of the Provincial Planning Statement (2024). Block 34 is within the Urban Growth Boundary and is identified by the London Plan as lands intended for residential development. The site has full access to City services.

The following is an analysis of applicable PPS policies:

*Policy 2.3.1.3 Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.*

**Response:** The proposed development meets the PPS definition of “intensification” (development at a higher density than what currently exists). It contributes to a “complete community” by providing a range and mix of housing types that are supported by the available infrastructure.

*Policy 2.9.1 Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through approaches that:*

- a) *Support the achievement of compact, transit-supportive, and complete communities;*
- b) *Incorporate climate change considerations in planning for and the development of infrastructure, including stormwater management systems, and public service facilities;*
- c) *Support energy conservation and efficiency*
- d) *Promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality and*

e) *Take into consideration any additional approaches that help reduce greenhouse gas emissions and building community resilience to the impacts of a changing climate.*

**Response:** The proposed development represents a compact, transit supportive development. It will contribute additional population to existing transit infrastructure helping to make transit viable. The higher residential densities are consistent with desired compact forms of development in proximity to elements of the transportation system.

Infrastructure of the parent subdivision incorporates elements of low impact development in the form of a third pipe system. Block 34 will contribute clean roof leader water to this system helping to feed a PSW located at the south end of Evans Boulevard.

*Policy 3.6.2 Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.*

**Response:** The proposed development will be connected to municipal sewage and water services.

## 5.2 THE LONDON PLAN

The following is a planning analysis of the applicable London Plan policies and how they relate to the requested Official Plan and Zoning By-law Amendment for the proposed development.

### Specific Area Policy Request

Drewlo Holdings Inc. is requesting that a Specific Policy Area be applied to the Neighbourhoods Place Type designation on the site to permit the proposed development, specifically to allow stacked townhouse units and low-rise apartment buildings up to 6 storeys in height. The following London Plan policies speak specifically to how the proposed development supports the addition of a Specific Policy Area upon the site.

**LP Policy 1730\_.** *The adoption of policies for Specific Areas may be considered in limited circumstances where the following conditions apply:*

1. *The proposal meets all other policies of the Plan beyond those that the specific policy identifies.*

**Response:** As documented throughout this report, the proposed development thoughtfully meets the other policies of the Plan beyond those that the requested specific policy area identifies.

2. *The proposed policy does not have an adverse impact on the integrity of the place type policies or other relevant parts of this Plan.*

**Response:** The requested policy to allow stacked townhouse units and low-rise apartment buildings with heights up to 6 storeys does not have an adverse impact on the integrity of the Neighbourhoods Place Type, or other relevant policies laid out in the

London Plan. A key element of the vision of the Neighbourhoods Place Type is to provide for a diversity of housing choices within our neighbourhoods, to allow for affordability and give residents the option to age-in-place if they choose (*LP Policy 916\_3.*). Adding further forms of medium-density residential to the Summerside Community allows for a more diverse housing stock within the area, providing residents with more attainable housing options, and offers the opportunity for area residents to live within their community as they age. Major goals of The London Plan place emphasis on creating a compact form (*LP Policy 66\_*) through the efficient use of residential intensification which emphasizes development which is “inward and upward” (*LP Policy 79\_*). The proposed development satisfies these overarching goals, ensuring London is prepared to meet and successfully manage expected growth.

*3. The proposed use is sufficiently unique and distinctive such that it does not establish an argument for a similar exception on other properties in the area.*

**Response:** Majority of land in the surrounding area, generally bound by Highbury Avenue (Expressway) between Commissioners Road East and Bradely Avenue, has already been developed, or is under the process of being developed. The site provides for a unique situation as it is bordered by an Expressway and commercial area within an already built-up area of the City. Further it is located within the Primary Transit Area which is intended to absorb large portions of intensification. The unique circumstances of the parcel ensures that that this project does not create a precedent in the nearby area.

*4. The proposed use cannot be reasonably altered to conform to the policies of the place type.*

**Response:** Given the opportunity the subject site presents for residential intensification, and the proximity of the site to major transportation corridors, it would be unreasonable to apply the existing maximum height through a firm lens. The London Plan also does not explicitly dictate development standards along Expressways, which are the highest order street classification. Therefore, the request is justified and allows for a more diverse housing stock in the Summerside subdivision, meeting core goals of the Neighbourhoods Place Type.

*5. The proposed policy is in the public interest, and represents good planning.*

**Response:** The proposed policy allows for better utilization of the site, fostering more diverse forms of housing within the Summerside neighbourhood and allowing more London residents to find a place to call home. It allows for an appropriate level of residential intensification while ensuring that possible impacts on adjacent properties are mitigated. The overall intention of The London Plan supports the proposed development, as does provincial planning policies regarding housing and intensification within built-up areas.

**LP Policy 1641\_.** *Increases in building height above the Standard Maximum may be permitted where the resulting intensity and form of the proposed development represents good planning within its context.*

**Response:** The proposed development ensures the creation of a more complete community in Summerside, and creates a compact built form fulfilling multiple core goals of the London Plan.

### Key Directives

The following London Plan policies respond to the plan's Key Directions which provide focus for development and guide the city towards the vision which is created throughout the plan.

**LP Policy 59\_.** *Build a mixed-use compact city.*

**Response:** The proposed development represents a pattern of growth which is compact and contiguous (*LP Policy 59\_2.*). It efficiently uses land which is designated for residential development in the Neighbourhoods Place Type, and within the Primary Transit Area, an area intended for intensification. The site is located within London's Urban Growth Boundary, reducing the need for urban expansion and managing growth in an efficient way (*LP Policy 59\_5.*). It supports the vision of growing "inward and upward" (*LP Policy 59\_2.*) by promoting higher densities, meeting core goals of The London Plan. It adds to the housing mix found within the Summerside community, creating a more complete community, and allowing area residents to age in place within their neighbourhood if they choose to do so (*LP Policy 59\_8.*).

**LP Policy 61\_2.** *Design complete neighbourhoods by meeting the needs of people of all ages, incomes and abilities, allowing for aging in place and accessibility to amenities, facilities and services.*

**Response:** The proposed development further diversifies the housing options in the Summerside subdivision, contributing to attainable form and tenure options within the area. The addition of more medium-density housing forms into the neighbourhood creates opportunities for community completeness. Complete communities represent neighbourhoods which are strong, healthy and attractive for all citizens.

This gives residents a choice to age-in-place in their community. Block 34 is also located within close proximity to existing commercial areas, as well as schools, parks, and open green spaces, which helps to develop an attractive community. Adding dense housing forms within the area further supports the active use of these services, and creates a tight-knit community within Summerside, producing a neighbourhood which is strong, healthy, attractive, and most importantly – open to everyone.



**LP Policy 62\_.** *Make wise planning decisions.*

**Response:** The development proposed for Block 34 supports the creation of a safe and healthy community within Summerside, diversifying the existing housing stock, providing an opportunity for more attainable housing forms within the area. This allows for a varied population to reside within the neighbourhood, ensuring that more Londoners have a place to call home, creating social sustainability within the subdivision (*LP Policy 62\_2.*).

The proposed development is located within London's Urban Growth Boundary, in an already built-up area, which is designated for residential uses. It represents an efficient land use pattern and helps to promote environmental sustainability, mitigating the effects of urban sprawl (*LP Policy 62\_2.*). The site is located within close proximity to existing pedestrian and cycling infrastructure as well as existing public transit services, representing the efficient use of these services, and reducing the need to further expand them. These existing forms of active transportation found within the area allow for an active pedestrian realm, which is safe and accessible for all.

The proposed development adds on to existing forms of medium density residential uses found along Evans Boulevard with medium density residential uses also being planned south of the site (*LP Policy 62\_9.*). Proposed low-rise apartment buildings have been sited towards the Highbury Avenue Expressway, with townhouses being sited towards lower density uses found along Evans Boulevard to act as a transitional barrier between the different types of housing form found in the area (*LP Policy 62\_8.*).

### City Building Policies

The City Building Policies of the London Plan guide how growth will occur (*LP Policy 184\_.*), including setting out policies regarding the shape, character, and form which is preferred (*LP Policy 186\_.*). The following London Plan policies speak to the directives found under the City Building section.

**LP Policy 193\_.** *In all of the planning and development we do and the initiatives we take as a municipality, we will design for and foster: (1) A well-designed built form throughout the city; (2) Development that is designed to be a good fit and compatible within its context; (4) Development that supports a positive pedestrian environment; (5) A built form that is supportive of all types of active mobility and universal accessibility; (7) A mix of housing types to support ageing in place and affordability; and (9) Healthy, diverse and vibrant neighbourhoods that promote a sense of place and character.*

**Response:** The proposed development represents a well-designed built form, adding on to a built-up area, and meeting core London Plan goals of intensification and compact development patterns. It is designed to be a good fit within the surrounding area and supports a positive pedestrian environment. The built form proposed for the site is accessible for all residents, and supports forms of active mobility, with pedestrian connections, and existing cycling and transit routes within close proximity of the site. Adding further forms of medium-density housing into the area contributes to the diversity of housing types within the Summerside subdivision, as does the proposed development's rental tenure, allowing for a different and more attainable housing option

in the neighbourhood, and providing residents an opportunity to remain in their community as their lives evolve. The proposed development adds diversity and vibrance to the neighbourhood, furthering overall community completeness in Summerside.

**LP Policy 252\_.** *The site layout of new development should be designed to respond to its context and the existing and planned character of the surrounding area. AND LP Policy 253\_.* *Site layout should be designed to minimize and mitigate impacts on adjacent properties.*

**Response:** The layout of the proposed development has been designed to respond to the context of the surrounding area. The proposed low-rise buildings are proposed to be located on the eastern side of the site, closer to Highbury Avenue North (an Expressway). Expressways are the highest order street classification in The London Plan. The proposed townhouses found on the site act as a transitional barrier toward lower density forms of housing. This also continues to create a cohesive street wall along Evans Boulevard, with the proposed development matching the forms currently found along the street.

**LP Policy 495\_.** *Providing accessible and affordable housing options for all Londoners is an important element of building a prosperous city. Quality housing is a necessary component of a city that people want to live and invest in. Housing choice is influenced by location, type, size, tenure, and accessibility. Affordability and housing options are provided by establishing variety in these factors.*

**Response:** The proposed development diversifies the existing housing stock found within the Summerside neighbourhood, providing a more attainable option within the area. It also further introduces new tenure forms into the subdivision, bringing more purpose-built rental housing in the community. This diversity of housing allows more residents to find housing in Summerside, creating in a more prosperous city.

**LP Policy 497\_.** *Through all the planning we do and the initiatives we pursue, our goal is to:*

*7. Promote a choice of housing types so that a broad range of housing requirements is satisfied in a wide range of locations.*

*8. Allow for aging in place, so that there are opportunities for people to remain in their neighbourhood as their housing needs change over time.*

**Response:** The proposed development further adds different housing forms into the Summerside community, creating opportunities for more people to reside in the area, as well as provide the option for people to remain in their neighbourhood as they age if they choose to do so.

**LP Policy 506\_.** *Subject to the City Structure Plan and Residential Intensification policies in the Neighbourhoods Place Type chapter of this Plan, infill and intensification in a variety of forms, including additional residential units, will be supported to increase the supply of housing in areas where infrastructure, transit, and other public services are available and accessible. (OPA 78)*

**Response:** The proposed development is representative of a project which adds intensity to an otherwise predominantly low-density residential area, making efficient use of existing public services and infrastructure.

**LP Policy 507\_.** *New neighbourhoods will be planned to provide a mix of housing types and integrated mixed-use developments, accessible housing and integrated services, and housing forms and densities.*

**Response:** The proposed development further adds forms of medium-density residential uses to the Summerside community. This adds to the housing mix found in the neighbourhood and creates a community which better meets the goals of the Neighbourhood Place Type.

**LP Policy 509\_.** *New neighbourhoods will be planned to include a variety of different housing types such that it is possible for people to remain in a neighbourhood as their housing needs change over time.*

**Response:** The addition of purpose-built rental, medium density residential uses upon the site gives area residents additional choices in regards to housing options, which will help members of the community be able to remain in their community as they age and as their housing needs change.

### Place Type Policies

As outlined in London Plan policy 917\_., the Neighbourhoods Place Type makes up the vast majority of our City Structure's land area. The key elements of the Neighbourhood Place Types are outlined in Policy 916\_. The proposed development helps to achieve the vision of the Neighbourhoods Place Type as outlined below.

**LP Policy 918\_.** *We will realize our vision for the Neighbourhoods Place Type by implementing the following in all the planning we do and the public works we undertake:*

*2. Neighbourhoods will be planned for diversity and mix and should avoid the broad segregation of different housing types, intensities, and forms.*

*13. Intensification will respect existing neighbourhood character and offer a level of certainty, while providing for strategic ways to accommodate development to improve our environment, support local businesses, enhance our physical and social health, and create dynamic, lively, and engaging places to live.*

**Response:** The proposed development adds to the existing mix of housing in the Summerside neighbourhood, and avoids segregation of different housing types by combining both forms of apartment buildings, as well as townhouses on the site. The development represents intensity which is within a reasonable level for the area. The

addition of townhouses upon the site makes for a gentle transition between the different levels of density found upon the block.

**LP Policy 919\_.** *The policies and tables within this chapter implement the following basic approach to plan for both new and existing neighbourhoods within the Neighbourhoods Place Type:*

6. *In general terms, the intent of this approach is to balance neighbourhood stability and predictability with the goals of creating neighbourhoods that allow for different housing types, an appropriate mix of uses, affordability, aging in place, and vibrant, interesting communities.*

**Response:** The proposed development further diversifies Summerside's housing stock, and provides a form of housing in the area which is attainable for residents and will allow residents to continue to live in their neighbourhood as they age, if they choose to do so.

**LP Policy 937\_.** *Residential intensification is fundamentally important to achieve the vision and key directions of The London Plan. Intensification within existing neighbourhoods will be encouraged to help realize our vision for aging in place, diversity of built form, affordability, vibrancy, and the effective use of land in neighbourhoods...*

**Response:** The proposed development represents intensification in an area which is already built up within London. Permitting forms of higher density upon the site will help to achieve the key vision for the Neighbourhoods Place Type.

**LP Policy 938\_.** *Residential intensification means the development of a property, site, or area at a higher residential density than currently exists. Intensification adds one or more residential units to a site...*

**Response:** The proposed development represents a development which creates a higher residential density than currently exists. Permitting higher densities and heights upon the site will allow for positive residential intensification to take place.

**LP Policy 940\_.** *It is an important strategy of this Plan to support all of these forms of intensification, while ensuring that they are appropriately located and fit well within their neighbourhood.*

**Response:** The proposed development is a form of residential intensification which fits well into its surrounding neighbourhood. The addition of townhouses upon the site provides for a transitional barrier between the different uses of density found upon the site, ensuring that these different housing forms transition seamlessly into the neighbourhood.

**LP Policy 953\_.** *The City Design policies of this Plan will apply to all intensification proposals. In addition, the following design policies will apply:*

2. *Compatibility and fit, from a form perspective, will be evaluated based on such matters as:*
  - a. *Site layout within the context of the surrounding neighbourhood, considering such things as access points, driveways, landscaping, amenity areas, building location, and parking.*
  - b. *Building and main entrance orientation.*
  - c. *Building line and setback from the street.*
  - d. *Character and features of the neighbourhood.*
  - e. *Height transitions with adjacent development.*
  - f. *Massing appropriate to the scale of the surrounding neighbourhood.*
3. *The intensity of the proposed development will be appropriate for the size of the lot such that it can accommodate such things as driveways, adequate parking in appropriate locations, landscaped open space, outdoor residential amenity area, adequate buffering and setbacks, and garbage storage areas.*

**Response:** The proposed development meets the City Design Policies, as it is compatible with its surrounding context. The size of the block allows for intense residential development as well as adequate space for parking, screened from public roads; adequate driveways allowing access into and throughout the site; as well as landscaped green spaces. The development also creates a continuation of the existing street wall found along Evans Boulevard and adds to the pedestrian realm of the area. In addition, the different forms of development found within Block 34 act as a transitional barrier between differing heights found on the site and existing buildings in the neighbourhood.

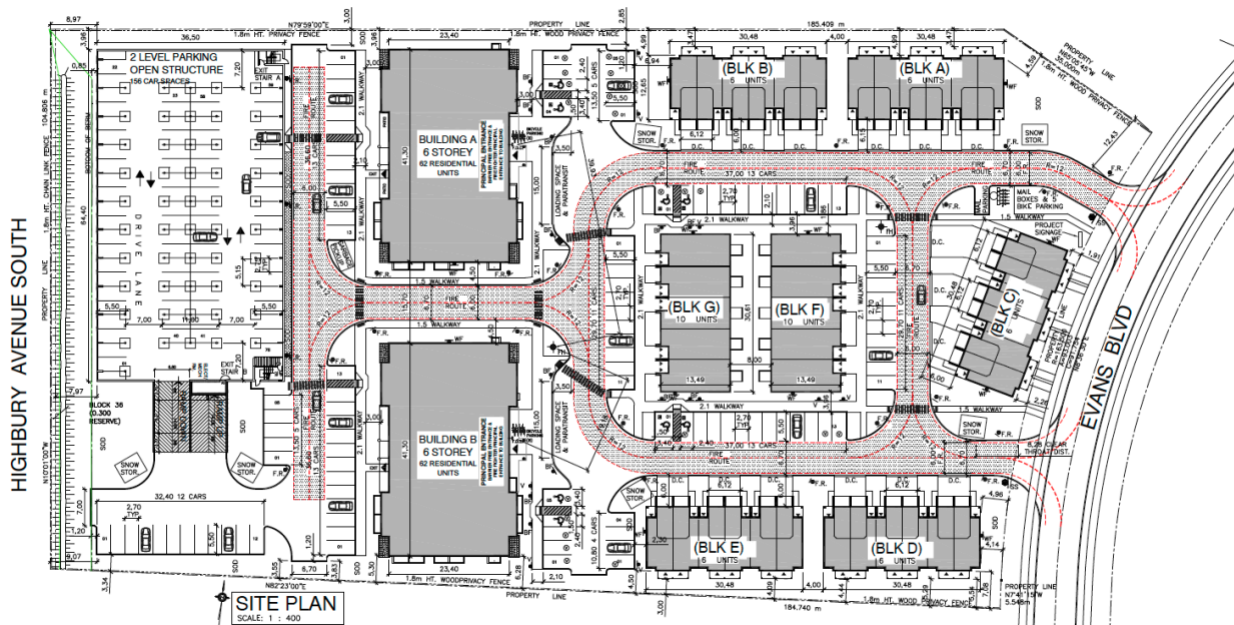
## 5.4 Urban Design

### SITE DESIGN

The proposed development at Block 34 (33M-845) abuts public streets on two sides; with Highbury Avenue located to the west, and Evans Boulevard located to the east. To the north, the block is bordered by the Summerside Shopping Centre, while to the south the site is bounded by planned medium-density residential development (intended form, townhouses)

The design consists of a total of 174 units, with approximately 1.25 surface parking spaces per unit, in the form of:

- Two (2) 6-storey apartment buildings (144 units);
- Seven (7) blocks of townhomes; (totalling 50 units):
  - Five (5) 3-storey cluster townhouse blocks
    - Blocks along the frontage of Evans Boulevard will be designed to feature entrances to the street, complete with pedestrian connections to sidewalks located within the municipal right-of-way; and
  - Two (2) blocks of stacked townhouses, located centrally in the site acting as a transitional form of development between the low-rise apartment buildings and surround lower-density residential uses.

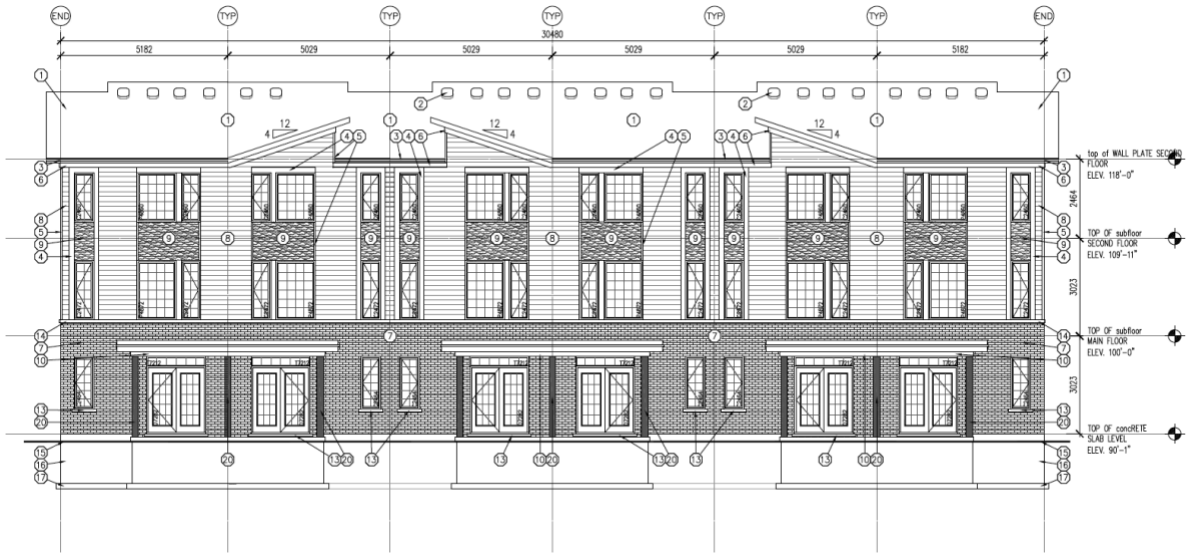


The following describes the intended built form:

- The mass of proposed apartment buildings has been broken up using a number of massing techniques including: projections and recessions, changes in building materials/colours, and the incorporation of varying window sizes.
- The massing of all proposed buildings has been designed to create a comfortable pedestrian environment, which will be further enhanced through the provision of private amenity space in the form of balconies and patios, as well as common amenity areas.
- Articulated building designs, with particular attention to building elevations visible to the surrounding public realm, with elements that create a rhythm along the streetscape.
- High quality materials that result in an attractive modern design.
- Repetition of lines and windows through both vertical and horizontal articulations to break up building mass.
- Outdoor living space of the individual townhome units provided in the form of 2<sup>nd</sup> floor decks and patios at grade-level.









The following London Plan policies speak directly to the site's proposed design.

**LP Policy 197\_.** *The built form will be designed to have a sense of place and character consistent with the planned vision of the place type... AND LP Policy 916\_.* *In 2035 the Neighbourhoods Place Type will be vibrant, exciting places to live, that help us to connect with one another and give us a sense of community well-being and quality of life. Some of the key elements of our vision for the Neighbourhoods Place Type include:*

- 1. A strong neighbourhood character, sense of place and identity.*
- 3. A diversity of housing choices allowing for affordability and giving people the opportunity to remain in their neighbourhoods as they age if they choose to do so.*

**Response:** The vision for the Neighbourhood Place Type is established by London Plan Policy 916\_.

The proposed development is a component of the overall Summerside Subdivision (City File No. 39T-92020). Strong neighbourhood character, sense of place and identify is establish throughout the community.

The community is primarily dominated by single detached dwellings and low-density forms of residential development. The proposal will contribute to a diversity of housing choice, allowing for attainability in the market and giving people the opportunity to remain in their neighbourhood as they age, if they choose to do so.

The proposed development connects residents to the existing community, and provides opportunities for connections with existing active mobility networks found in the area. The development is located within an area which is well-connected to differing land uses, allowing for easy access to daily needs and services within the community.

**LP Policy 255\_.** *Site layout will promote connectivity and safe movement for pedestrians, cyclists, and motorists between, and within, sites.*

**Response:** The proposed layout of the site provides safe and efficient connections for pedestrians, cyclists, and motorists. Multiple paths connect throughout the site to existing pedestrian infrastructure found along Evans Boulevard, allowing for high levels of active transportation throughout the site and within the Summerside community.

**LP Policy 259\_.** *Buildings should be sited with minimal setbacks from public streets and public spaces to create an inviting, active and comfortable pedestrian environment.*

**Response:** The proposed townhouses along Evans Boulevard make use of minimal setbacks, creating an activated streetscape. These units will feature entrances onto the street and pathways to units, creating an inviting and comfortable pedestrian realm along the road.

**LP Policy 268\_.** Sites shall be designed to provide a direct, comfortable and safe connection from the principle building entrance to the public sidewalk.

**Response:** The principal entrances of the proposed buildings found on Block 34 connect to pedestrian networks found upon the site which allow for direct, comfortable and safe access to public pedestrian infrastructure.

**LP Policy 269\_.** Buildings should be sited to minimize the visual exposure of parking areas to the street.

**Response:** The siting of buildings proposed for Block 34 minimizes the visual exposure of parking areas from Evans Boulevard. The majority of the parking proposed for the site is located near the Highbury Avenue Expressway which is buffered by a natural landscaped berm.

**LP Policy 270\_.** The location, configuration, and size of parking areas will be designed to support the planned vision of the place type and enhance the experience of pedestrians, transit-users, cyclists, and drivers.

**Response:** The parking areas proposed for Block 34 support the planned vision of the Neighbourhoods Place Type. The majority of parking for Block 34 is found in the rear yard of the site, placing emphasis on the creation of an active streetscape, and creating a vibrant community atmosphere which allows automobiles to co-exist with pedestrians, transit-users, and cyclists.

**LP Policy 272\_.** The impact of parking facilities on the public realm will be minimized by strategically locating and screening these parking areas. Surface parking should be located in the rear yard or interior side yard. **AND LP Policy 273\_.** ...Structured parking will be screened.

**Response:** The location of parking areas on Block 34 are effectively screened through the siting of buildings upon the site and the use of landscaping measures. A two-storey parking structure has been proposed to be located in the rear portion of the site, screened from the pedestrian realm on Evans by the siting of the proposed buildings, and buffered from the Highbury Avenue Expressway by a landscaped berm.

**LP Policy 280\_.** Adequate bicycle parking facilities will be required for all development to encourage cycling as a viable form of transportation. Covered and secure forms of bicycle parking should be incorporated into multi-unit residential, large-scale commercial or retail, institutional, and recreational developments.

**Response:** The proposed development will provide both long-term and short-term bicycle parking/storage as required by Section 4.19.14) of the City's Zoning By-law.

## CITY OF LONDON'S PLACEMAKING GUIDELINES (NOVEMBER 2007)

The activity of placemaking is described within the Guideline Document as a design process that strives to create livable communities, providing identifiable character, a sense of place and a high quality of life. It is further indicated that Placemaking Guidelines classify and explain elements and stages of Placemaking; they are intended to be a starting point for design and development of smart growth.

The proposed development is located within the established Summerside community. This neighbourhood features mostly single-family detached residential dwellings constructed within the last 15 years. There are also examples of townhome communities within the neighbourhood, with further townhouse developments planned south of this block in the remaining phases of the subdivision. The area features multiple parks and is within close proximity to naturalized areas. The neighbourhood is also within close distance to shopping areas, restaurants, pharmacies, schools and important transportation routes. The neighbourhood will be complimented by future growth in the South East London area, with large-scale residential subdivisions, such as Jackson Meadows, currently under development or planned. The Summerside neighbourhood has been designed to support a healthy and sustainable population which offers different housing forms for all stages of life.

Block 34 is located within the Summerside subdivision (City File No. 39T-92020), and will build further on the vision of the community, furthering the diversity of housing options in the neighbourhood in the form of purpose-built rental townhomes and low-rise apartment buildings.

## 6.0 CONCLUSIONS

In summary, the requested Zoning By-law Amendment is consistent, and in general conformity with, the framework of planning policy; including the *Planning Act*, Provincial Planning Statement (PPS, 2024), the London Plan and associated Guideline Documents.

The proposed development is compatible with existing development, and will be compatible with future surrounding development; it will increase the range of housing opportunities by providing a diversity of housing types and forms; and represents efficient growth patterns.