
PLANNING JUSTIFICATION REPORT ADDENDUM

**IN SUPPORT OF
OFFICIAL PLAN AMENDMENT &
ZONING BY-LAW AMENDMENT
APPLICATIONS**

**PREPARED FOR
Foundation Development Fund I LP**

**57-75 Wellington Road
City of London**

August 2026
GSAI File: 1707-001

TABLE OF CONTENTS

1.0 INTRODUCTION	1
1.1 APPLICATION HISTORY	2
2.0 REVISED PROPOSED DEVELOPMENT	2
2.1 AFFORDABILITY	5
2.2 SURROUNDING CONTEXT	5
3.0 PROPOSED ZONING BY-LAW AMENDMENT	10
4.0 CONCLUSION	12

**Planning Justification Report Addendum
Foundation Development Fund I LP
Official Plan Amendment & Zoning By-law Amendment
57-75 Wellington Road (City of London)**

1.0 INTRODUCTION

Glen Schnarr & Associates Inc. (GSAI) was retained by Foundation Development Fund I LP (the ‘Applicant’) to assist with planning approvals to implement redevelopment of the lands municipally known and legally described as per below:

- 57 Wellington Road, *Part Lot 25, Concession Broken Front, Part 1, 33R2852 Except Part 6 On 33R9660 And Part 3, 33R21870; T/W Ease Over PT 2 PL 33R-16001 As In ER341297 Subject To An Easement In Gross Over Part 4, 33R21870 As In ER1603968 City of London;*
- 63 Wellington Road; *Part Lot 25, Concession Broken Front, As In Istly Of 729535 Except Part 5, 33R21870; S/T Ease Over PT 2 PL 33R-16001 As In ER341297 (Partial Release As In ER1603978) Subject To An Easement In Gross Over Part 6, 33R21870 As In ER1603976 City of London;* and,
- 75 Wellington Road; *Part Lot 9, Plan 33(4TH) As In 862829, Save & Except Part 7 Plan 33R21870 Subject To An Easement In Gross Over Part 8 Plan 33R21870 As In ER1594194 City of London.*

The above lands are collectively referred to as the ‘Subject Lands’ or ‘Site’ and are located west of Wellington Road, east of High Street, and south of Grand Avenue, in the City of London.

The Subject Lands are adjacent to another land assembly under the ownership of Foundation Development Fund II LP, municipally known as 60-68 High Street, and which are collectively proposed to share an internal laneway and amenity area.

The Subject Lands are approximately 0.15 hectares (0.38 acres) in total area and currently occupied by two three-storey apartment buildings and two single detached structures. The surrounding area is highly serviced by active transportation and public transit infrastructure, including new investment in the City’s Wellington Gateway LRT rapid transit project.

The Proposed Development on the Subject Lands is a high density affordable apartment building, fronting Wellington Road and with vehicle access from High Street. The Proposed Development is planned to provide affordable housing units accessible to lower income residents in an efficient and functional apartment design. A Zoning By-law Amendment (the ‘Amendment’) is required to facilitate the Proposed Development.

GSAI previously prepared a Planning Justification Report (“PJR”) in support of the first application submission for Proposed Development and Amendments, dated May 2026. The

purpose of this PJR Addendum is to evaluate a revised concept for the Proposed Development. The revised concept is discussed below in Section 2.0. This PJR Addendum should be read in conjunction with the original PJR dated May 2026 and not in isolation as a stand-alone document.

1.1 APPLICATION HISTORY

This section provides a brief summary of the Applicant's submission and engagement history regarding the Proposed Development:

- **April 2026:** Pre-Application Consultation with City staff to discuss an initial concept plan and identify a submission checklist for the Proposed Development.
- **May 2026:** Initial application submission made, including PJR (GSAI, May 2026).
- **June 2026:** Application submission deemed complete (City File: **OZ-26078**).
- **June 2026:** Submission for neighbouring application (60-68 High Street) made and deemed complete (City File: **OZ-26079**). This neighbouring application was also made by the Applicant and designed comprehensively with the Proposed Development.
- **August 2026:** Application resubmission made for OZ-26078, which includes this PJR Addendum. The resubmission includes minor revisions to the concept plan, as discussed further in Section 2.0 Below.

2.0 REVISED PROPOSED DEVELOPMENT

Consistent with the May 2026 submission, the Proposed Development continues to be high density infill and a high rise purpose-built rental apartment. The fundamental approach to the Proposed Development has not changed but the revised proposal refines building height and design, ground floor configuration, unit mix, and vehicle and bicycle parking.

Building Height and Exterior Design

The revised proposal decreases tower height from 27-storeys (84 metres) to 21-storeys (69.5 metres). There is a subsequent 29% decrease in gross floor area from 23,417 square metres (252,058 square feet) to 16,617 square metres (178,863 square feet). There is also a decrease in FSI from 11.17 to 10.57, and an increase in density from 2,727 units per net hectare to 2,802 units per hectare.

The revised proposal also adds additional amenity space by adding unit balconies on the second to fourth storeys and also incorporates a 1.5 metre stepback at the fourth storey. The amenity rate is increased from 1.5 square metres per unit to 2.51 square metres per unit.

The building floor plate has been reduced from approximately 888 square metres (9,558 square feet) to 862 square metres (9,278 square feet) to accommodate functionally accessible sidewalks on all sides of the building and to reduce massing, while still meeting the technical specifications

required for the pre-cast modular building construction method. This practical design facilitates a functional and affordable development that directly facilitates the provision of affordable units.

The proposed revised height of 21-storeys (69.55 metres) is permitted within the “Rapid Transit Corridor” Place Type, per the City of London Official Plan, as well as the TSA1 zone, per the City of London Zoning By-law.

Ground Floor Configuration

The revised ground floor configuration primarily includes a new retail use in the northeast corner and increases the overall functionality of the building. Minor refinements were made to optimize the location and sizing of loading spaces, garbage room, bicycle parking, resident amenity spaces, and the pick-up/drop-off area. The new retail use is approximately 134 square metres (1,445 square feet), with frontage on Wellington Road, and intends to support residents and serve the immediate community. Potential retail use is convenience store/retail store, as permitted in the TSA1 zone. There is no change to the proposed building access. Primary access remains from Wellington Road, with additional access at the rear and continuous pedestrian pathways around the building.

Unit Mix

With the decrease in building height, the unit mix was revised from 572 to 440 units. At 50% affordability, this is an approximate reduction from 286 to 220 affordable units. In the revised proposal, unit sizes range from 274 square metres (2,949 square feet) for Studio, 401-479 square metres (4,316-5,155 square feet) for One-bedroom, and 604-650 square metres (6,501-6,996 square feet) for Two-bedroom. Each residential floor has 22 units, including 14 Studio, 5 One-bedroom, and 3 Two-bedroom. Each unit has at least one window facing east or west. Street-facing units on the second to fourth storeys have balcony access.

Vehicle and Bicycle Parking

Per the City of London Zoning By-law, there is no minimum parking requirement for the Subject Lands and no personal or visitor parking spaces are proposed. Seven short-term vehicle pick-up/drop-off spaces are located in the rear via High Street, intended for short-term, interim parking only. The supply of short-term parking exceeds the demand for pick-up/drop-off operations, per the Transportation Impact Assessment prepared by MDT in support of the Proposed Development.

Bicycle parking locations are reconfigured and the number of long-term spaces is increased to 196 total spaces. 196 long-term and 40 short-term bicycle parking spaces are located on the ground floor. The Subject Lands remain highly connected to public transit connections, including existing public transit stops within 50 metres, and future Wellington LRT rapid transit public stations within 400 metres.

As part of the comprehensive redevelopment with 60-68 High Street, a unique WÖHR Bikesafe bicycle storage structure is proposed between the two apartment buildings. The WÖHR Bikesafe is an automated, space saving system for long-term bicycle storage and will be used for bicycle

storage by the residents of 60-68 High Street. As contemplated through the comprehensive planning for both the Subject Lands and the 60-68 High Street application, and due to sizing and location requirements, a small portion of the Bikesafe structure will overlap with the rear yard of the Subject Lands. As such, the Bikesafe structure will need to be addressed in the implementing Amendment for the Proposed Development.

Revised site statistics are detailed in **Table 1** below.

Table 1 - Revised Site Statistics

DEVELOPMENT CHARACTERISTIC	DESCRIPTION
Total Site Area	1570 m ² (0.15 ha; 0.38 ac)
Building Footprint	861 m ² (9,272 ft ²)
Gross Floor Area (GFA)	16,617 m ² (178,868 ft ²)
Floor Area Ratio (FAR)	10.57
Density (UPH)	2,797
Lot Coverage	54%
Landscaped Open Space	10%
Retail Use	134 m ² (1,445 ft ²)
Total Units	440
Unit Mix	260 Studio; 120 One-bedroom; 60 Two-bedroom
Resident or Visitor Parking Spaces	None
Pick-up/Drop-off Spaces	7
Short-Term Bicycle Parking	40 Spaces (0.09 per unit)
Long-Term Bicycle Parking	196 Spaces (0.45 per unit)
Loading Spaces	2 (1 Type A, 1 Type G)
Amenity Space	1,106 m ² (11,902 ft ²) or 2.5 m ² per unit
Height	21 Storeys (69.5 m)
Front Yard Depth	2.0 metres (from main wall of building) 0.5 metres (from extent of balcony structure)
Interior Yard Depth	1.4 to 2.0 metres (north) 1.9 to 6.9 metres (south)
Rear Yard Depth	4.7 to 13.2 metres
Tower Separation (to 60-68 High Street proposal)	18.3 metres to 34.2 metres

2.1 AFFORDABILITY

The Provincial Planning Statement defines rental affordability as the least expensive of: “a unit for which the rent does not exceed 30 percent of gross annual household income for low and moderate income households; or a unit for which the rent is at or below the average market rent of a unit in the municipality”. To supplement this definition, the Province publishes an annual bulletin which identifies the thresholds of affordable and average market rents for Ontario municipalities¹. Recently (since submission of the May 2026 PJR), the Province updated their annual bulletin and we note that from 2025 to 2026, the threshold for affordability has increased slightly by an average of approximately 5%.

The Proposed Development will provide a minimum of 50% of units at affordable rents per unit type, 10% of which will be deeply affordable rents (80% of average market rent). Per the Applicant, the 40% (176 units) provision of the affordable rental units is subject to the receipt of expected grants and loans, whereas the 10% provision (44 units) of the deeply affordable rental units has been confirmed. The remaining units will be targeted at or near the affordable monthly rent of the City of London (see **Table 2**).

Table 2 identifies the affordable monthly and average market rents for the City of London per the Province’s annual bulletin (July 2026). For additional comparison, see the fourth column of **Table 2** for 2025 average market rents for the City of London published by Canada Mortgage and Housing Corporation (CMHC). There were no updates to the CMHC averages since the May 2026 PJR submission.

Table 2 - Affordable Monthly Rents in the City of London

UNIT TYPE	AFFORDABLE MONTHLY RENT (Provincial Bulletin)	AVERAGE MARKET RENT (Provincial Bulletin)	AVERAGE MARKET RENT (CMHC)
Bachelor (Studio)	\$1,081	\$1,081	\$1,066
One-bedroom	\$1,384	\$1,384	\$1,371
Two-bedroom	\$1,657	\$1,657	\$1,645
Three-bedroom	\$1,830	\$1,830	\$1,872

2.2 SURROUNDING CONTEXT

There is no change to the physical context of the surrounding area to the Subject Lands, however, the planning context is evolving. The Applicant now has an active planning application for the residential properties immediately west and abutting the Subject Lands (60, 62, 64, 68 High Street;

¹ July 2026 Bulletin of the Affordable Residential Units for the Purposes of the Development Charges Act, 1997

City File OZ-26079). The abutting lands are comprehensively planned with the Proposed Development for a similar high density affordable housing development.

The Applicant is also engaged in early planning stages for a third and future affordable housing development on adjacent lands (76, 80, 84 High Street). This parcel consolidation currently consists of three detached houses directly south of the Subject Lands and plans for a similar high density affordable housing development.

3.0 ADDITIONAL JUSTIFICATION

Revised Built Form and City Structure

At a revised height of 21 storeys, the Proposed Development provides a transition of height and intensity between Wellington Road, the Subject Lands, and the adjacent comprehensively-planned application for 60-68 Wellington Road (also on behalf of the Applicant). The 21-storey building defines the street edge along a rapid transit corridor and has a modest maximum lot coverage of 55% compared to the permitted maximum of 80% in the Zoning By-law. In the comprehensive plan, density is transitioned westward, towards High Street, which is an established apartment neighbourhood with established vehicle access. Further building revisions (balconies up to the fourth storey and 1.5 metre step back above) contribute to a more human-scale experience along the Wellington Road frontage. The proposed balconies and new proposed retail on the ground floor will also contribute to eyes on the street and an active street frontage.

The Provincial Planning Statement (PPS) prioritizes growth and development to Settlement Areas and within Strategic Growth Areas and Major Transit Station Areas (MTSA). The PPS plans for the greatest amount of growth to be within MTSA's and to achieve transit-supportive densities. The Subject Lands are within an MTSA and the City of London's Rapid Transit Corridor Place Type and remain consistent with the direction of the PPS for intensification and higher density development in a compact built form.

The City of London Official Plan identifies a planned City structure and directs the most intense forms of development to the Downtown, Transit Villages, and at station locations along the Rapid Transit Corridors (86_). 75% of the City's intensification target will be directed to the Primary Transit Area, including Rapid Transit Corridors (92_3). It is recognized that Downtown is unique and planned for the greatest level of intensity, however the Rapid Transit Corridors are also intended to attract and promote transit-supportive infill and intensification. Rapid Transit Corridors are intended to connect the Downtown to Transit Villages (95_) and per the Official Plan it is "critical" that Rapid Transit Corridors are developed intensively to make rapid transit sustainable over the long term (817_). Refer also to Key Direction #5 of the Official Plan, which directs high intensity development along Rapid Transit Corridors (59_1).

In the planned City structure, the Subject Lands are located in an appropriate area for intensification. Per the Official Plan, not all segments of the Rapid Transit Corridor Place Type

will be the same in character, use, or intensity, and some segments will be primarily residential, with small-scale commercial, rather than mixed-used (826_). Parts of Rapid Transit Corridors in close proximity to transit stations may allow for a greater intensity and height to support transit usage (827_). The City plans to implement the vision for the Rapid Transit Corridor Place Type by supporting a variety of residential types, including in location, size, affordability, design, and accessibility, in order to satisfy a broad range of housing requirements (830_11). Development will be sensitive to adjacent land uses by transitioning building heights and providing sufficient buffers (840_1). The proposed 21-storey design with affordable housing and ground floor retail supports the planned vision of the Rapid Transit Corridor Place Type

Development in the Rapid Transit Corridor Place Type will be planned to achieve a minimum number of 120 residents and jobs per hectare (840_3). This minimum target is met and exceeded in the Proposed Development, which plans for 440 units or an approximate population of 636². Lot consolidation to create comprehensive developments and reduce vehicular accesses to the street is also encouraged (840_5), as provided in the Proposed Development and the adjacent 60-68 High Street application (City File: OZ-26079). Buildings are encouraged to create a pedestrian-oriented street wall (841_2), with articulation and animation to support the pedestrian environment (841_3). The massing and scale of the Proposed Development continues to meet the density and development goals of the Official Plan. The proposed revisions discussed in this PJR Addendum will support the pedestrian environment along Wellington Road and support transition to the neighbouring environment.

Table 3 below identifies recent high density development applications and approvals in the City of London along the peripheral areas of the Downtown (Downtown Area (DA2) Zone); the Business District Commercial (BDC) Zone; and the Wellington Gateway (Transit Station Area (TSA1) Zone). Please note that due to inconsistent public documentation, the FAR calculations should be considered approximate estimates. On review, and notwithstanding its provision of affordable housing, the Proposed Development's height and density is considered more modest than these precedents.

² Per the density assumptions with the City of London "2021 Development Charges Background Study": High Density Apartment 1-bedroom (**1.38** persons per unit); High Density Apartment 2-bedroom (**1.87** persons per unit)

Table 3 – Precedent High Density Developments in the City of London

Address	Zone	Height	Residential Density (FAR)	Building Coverage
57-75 Wellington Road (the Subject Lands)	TSA1	69.5m (21-storeys)	10.57	55%
60-68 High Street (by the Applicant)	TSA1	99.55m (31-storeys)	10.74	38%
359 Wellington Road & 657 Base Line Road East ³	R9-7(58)*H73/h-13*TSA1	72.9m (23-storeys)	14.7	61%
267 York Street ⁴	DA2(8)	150m (40 & 45-storeys)	11.7	85%
50 King Street & 399 Ridout Street North ⁵	DA2(7)	186m (43 & 53 storeys)	12.8	39%
743 Richmond Street ⁶	BDC(52)	125m (35-storeys)	24	77%

Efficient Development Pattern

The Proposed Development further contributes to the City's goals of efficient development, providing for intensification on site with existing municipal services and avoiding extension of municipal services into greenfield areas to accommodate growth. There is an existing concentration of municipal services accessible to the Subject Lands, including recent investment in the Wellington LRT project.

PPS policy generally emphasizes development at a density that efficiently uses land and resources (see Section 2.2.1(c); 2.3.1.2(a); and 3.1.1). Further, Section 2.4.2.2(b) of the PPS states that municipalities should plan for a minimum density target of 160 residents and jobs combined in an MTSA served by light rail rapid transit. The Proposed Development plans for 440 units or an approximate population of 636, which meets and exceeds the PPS density target. The Proposed Development is located adjacent to existing municipal water, wastewater, stormwater, transportation, and community services, and is consistent with the PPS in this regard.

The residential density of the Proposed Development is approximately 2,797 UPH. There is no maximum density in the Official Plan or Zoning By-law for the Subject Lands, and as discussed above, the Proposed Development meets the density and development goals of the Rapid Transit Corridor Place Type. The Proposed Development is considered efficient in that it avoids a spread

³ Per Report to PEC dated July 16, 2024 (OZ-9719, Ward 11).

⁴ Per Report to PEC dated August 13, 2024 (OZ-9736, Ward 13). Excludes the structured parking area.

⁵ Per Report to PEC dated October 3, 2023 (OZ-9622, Ward 13).

⁶ Per Report to PEC dated June 10, 2025 (OZ-25048, Ward 13).

pattern of development, as defined in the Official Plan to mean a form of development that inefficiently uses lands, does not incorporate a substantial mix of height and density, and may include gaps in the urban form (1795_). As such, the cost of growth on the Subject Lands may be different from the costs of growth in other areas of the city. Refer also to Key Direction #5 of the Official Plan, which plans for infill and intensification of various types and forms to take advantage of existing services and facilities and to reduce the need to grow outward (59_4).

The Official Plan states that the rapid transit system, including the Wellington LRT, is tended to attract and stimulate intensification (341_). Further, the Official Plan states that civic infrastructure is to be coordinated and cost effective in delivery (451_8), and it is a “*high priority*” to plan civic infrastructure to accommodate infill and intensification within the Downtown, Main Street, Transit Village, and Rapid Transit Corridor Place Types (453_), rather than extending services outward to undeveloped lands. The Proposed Development meets the goal of the Official Plan for efficient development in a location planned for intensification.

Affordability

The Proposed Development will be 50% affordable, including 10% deeply affordable. This remains consistent with Section 2.2 of the Provincial Planning Statement (PPS), which supports a range and mix of housing options, as well as all types of residential intensification that results in a net increase in residential units. *Housing Options* is defined in the PPS as a range of housing options such as but not limited to apartments and affordable housing.

Further, the City of London Official Plan identifies a target of 25% of new housing to be affordable to low-and-moderate-income households (517_). The Proposed Development will meet and exceed this target, providing 50% affordability, with the remaining units rented at or near the affordable monthly rent of the City of London per unit type. At the reduced height of 21-storeys and resulting reduced unit count, the revised Proposed Development will provide approximately 220 affordable units. Affordable monthly rents are identified in **Table 2** of this report and range between \$1,081 (studio/bachelor) to \$1,657 (two-bedroom) per unit type. These rents would represent approximately 30% of before-tax income for households making up to and around \$60,000.

The Official Plan supports infill and intensification in a variety of forms with intent to increase the supply of housing in areas with highly accessible infrastructure (506_), and “*abundant opportunities*” will be provided for the development of housing types and densities in conformity with the City Structure Plan (508_). The Official Plan states that “*building height and densities may be increased, in conformity with the Our Tools part of this Plan, to support the provision of affordable housing*” (521_). The Proposed Development conforms to the Official Plan policy in this regard, providing a high percentage of affordable units in a Place Type that encourages high density intensification, without which an increase in density could not be achieved.

The Official Plan also encourages innovative design features and construction techniques that broaden the range of available housing alternatives (513_). The pre-cast modular construction

method and functional design features of the Proposed Development are intended to streamline construction and reduce housing costs – resulting in greater capacity for affordable housing and 50% affordability.

4.0 PROPOSED ZONING BY-LAW AMENDMENT

The Subject Lands are subject to the City of London Zoning By-law Z.-1 and are currently compound zoned “Holding-Residential R3/Transit Station Area (R3-2/h-13/TSA1)”. A Zoning By-law Amendment (‘ZBA’) is required to facilitate the Proposed Development.

The Proposed Development requires site-specific TSA1 permissions to implement site-specific building standards. To facilitate the revised proposal, site-specific zoning standards are as follows:

- Identify Wellington Road as the front lot line
- Permit an interior yard depth of 1.4 metres
- Permit a rear yard depth of 4.7 metres to the main wall of the building, or 0.0 metres to an accessory structure
- Permit a front yard depth of 2.0 metres to the main wall of the building, or 0.5 metres to a balcony structure
- Permit a landscaped open space area of 8%
- Permit a floor area ratio of 7.92
- Permit an amenity area rate of 2.5 square metres per residential unit
- Permit a long-term bicycle parking space rate of 0.45 spaces per residential unit
- Permit a short-term bicycle parking space rate of 0.09 spaces per residential unit

Table 4 below provides a review of applicable zoning regulations, compared to the Proposed Development. Areas of deficiency are bolded and identified in orange in the ‘Proposed’ column.

Table 4 – Zoning By-law Review Table

Applicable Zone (per 3.9(1)(i))	Regulation	Permitted	Proposed
TSA1	Permitted Use	Apartment Building, Retail Store	Apartment Building, Retail Store
R3-2	Lot Area (min)	360m ²	1,572m ²
TSA1	Lot Frontage (min)	30m	54.5m
TSA1	Front Yard Depth (min-max)	1.0m-3.5m	0.5 metres to extent of balcony structure 2.0 metres to main wall of building
TSA1	Exterior Yard Depth	N/A	N/A
TSA1	Interior Yard Depth (min)	3.0m	1.4m
TSA1	Rear Yard Depth (min)	7.5m 13.7m (where abutting a Residential zone)	4.7m to main wall of building 0.0m to accessory bicycle structure
TSA1	Landscaped Open Space (min)	10%	13%
TSA1	Lot Coverage (max)	80%	54%
TSA1	First Storey Height (min)	4.0m	4.25m
TSA1	Height (min-max)	8.0m – 82.0m	69.5m
TSA1	Residential Density (min)	45 UPH	2,792 UPH
TSA1	Floor Area Ratio (max)	6.5	10.57
TSA1	Gross Floor Area Office (max)	5,000m ²	N/A
TSA1	Amenity Area (min)	6.0m ² per residential unit	2.5m² per residential unit
TSA1	Step Back (for building greater than 21.0 metres)	1.5 metres between 8.0 metres and 21.0 metres	1.5m
R3-2	Maximum Number of Units Per Lot (max)	4	N/A
R3-2	Parking Area Coverage (max)	25%	N/A
General Provisions	Parking (min)	N/A in Rapid Transit Corridor Place Type	N/A
	Visitor Parking	No requirement	N/A
General Provisions	Electric Vehicle Parking Spaces	5% of spaces (for building with more than 40 res. units)	N/A
General Provisions	Parking (Short-Term Bicycle) (min)	0.1 spaces per unit	0.09 spaces per unit
General Provisions	Parking (Long-Term Bicycle) (min)	0.9 spaces per unit	0.45 spaces per unit

As discussed in Section 2.0 above, a unique WÖHR Bikesafe bicycle storage structure is proposed between the Subject Lands and the Applicant's adjacent, comprehensively planned development (60-68 High Street). A rear yard setback of 0.0 metres to an accessory structure is required to facilitate the siting of this structure.

Additionally, we acknowledge that Zoning By-law Section 52 (TSA Zones) identifies conditional regulations for rear yard depths depending on context. The minimum rear yard depth is 7.5 metres⁷ and there is a more restrictive rear yard depth required where abutting a Residential zone⁸. The existing rear abutting zone is currently 'R3-2/h-13/TSA1' – but as noted – those lands now have an active planning application on behalf of the Applicant for a site-specific TSA1 zone. Given this context, we suggest that the Proposed Development should also be considered against the minimum depth of 7.5 metres, rather than the more restrictive rear yard depth.

5.0 CONCLUSION

This PJR Addendum should be read in conjunction with the original PJR dated May 2026 and not in isolation as a stand-alone document. We maintain our position that the Proposed Development and Amendments are consistent with the Provincial Planning Statement and conforms to the City of London Official Plan.

The Proposed Development is feasible and supportable from a planning perspective. The Proposed Development represents good planning and will contribute to the creation of complete communities through the introduction of much-needed affordable housing adjacent to higher order rapid transit and multiple community uses.

Respectfully submitted,

GLEN SCHNARR & ASSOCIATES INC.



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Planner

⁷ Section 52.3.1: “Within the TSA1, TSA2 and TSA3 Zone variations, the minimum rear yard depth shall be 7.5 metres, or 3.5 metres where a rear yard abuts a right-of-way.”

⁸ Section 52.3.2 “Notwithstanding 52.3 1) and Table 52.3, within any TSA Zone variation, the minimum rear and interior side yard depth shall be 7.5 metres plus 1.0 metre per 10.0 metres in height for all portions of a building above 7.5 metres in height where any TSA Zone variation abuts lands zoned Residential R1, Residential R2, and Residential R3 along the rear or interior property line.