
PLANNING JUSTIFICATION REPORT ADDENDUM

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

**PREPARED FOR
Foundation Development Fund II LP**

**60-68 High Street
City of London**

August 2026
GSAI File: 1707-002

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**Planning Justification Report Addendum
Foundation Development Fund II LP
Official Plan Amendment & Zoning By-law Amendment
60-68 High Street (City of London)**

1.0 INTRODUCTION

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

- 60 High Street, *PT LT 25, CON Broken Front, As In 847049; London;*
- 62 High Street, *PT LT 25, CON Broken Front, Part 1 & 2, 33R5186; S/T & T/W 941958; London;*
- 64 High Street; *PT LT 25, CON Broken Front, PT LT 1, PL 33(4TH), Part 2 & 3, 33R2852, S/T & T/W 729535, T/W Easement Over PT 2 PL 33R-16001 As In ER341297, London; and,*
- 68 High Street; *PT LT 1, PL 33(4TH), As In 927220; London.*

The above lands are collectively referred to as the ‘Subject Lands’ or ‘Site’ and are located east of High Street, west of Wellington Road, 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 57-75 Wellington Road, and which are collectively proposed to share an internal laneway and amenity area.

The Subject Lands are approximately 0.18 hectares (0.45 acres) in total area and currently occupied by three 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 and accessed by High Street. The Proposed Development is planned to provide affordable housing units accessible to lower income residents in an efficient and functional apartment design. An Official Plan Amendment and Zoning By-law Amendment (the ‘Amendments’) are 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 June 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 June 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:

- **May 2026:** Pre-Application Consultation with City staff to discuss an initial concept plan and identify a submission checklist for the Proposed Development.
- **June 2026:** Initial application submission made, including PJR (GSAI, June 2026), and deemed complete (City File: **OZ-26079**).
- **June 2026:** Submission for neighbouring application (57-75 Wellington Street and 68 High Street) made and deemed complete (City File: **OZ-26078**). The neighbouring application was also made by the Applicant and designed comprehensively with the Proposed Development.
- **August 2026:** Application resubmission made for OZ-26079, 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 June 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, unit mix, and vehicle and bicycle parking.

Building Height and Design

The revised proposal increases tower height from 25-storeys (77.5 metres) to 31-storeys (99.6 metres). There is a subsequent increase in gross floor area from 19,283 square metres (207,568 square feet) to 19,582 square metres (210,788 square feet). There is also an increase in FSI from 10.58 to 10.74, and an increase in density from 2,368 units per hectare to 2,960 units per hectare.

We note that although there is a 24% and 25% increase in height and density (respectively), there is only a relatively minor 1.5% increase in both gross floor area and FSI. This is in part due to a reconfiguration of the floorplate from 841 to 693 square metres, and a reduction in lot coverage from 46% to 38%. The reconfigured floorplate also accommodates functionally accessible sidewalks on all sides of the building.

The revised proposal also adds new amenity space by adding unit balconies (1.7 metre depth) on the second to fourth storeys and also incorporates a 1.5 metre stepback at the fourth storey. In the revised proposal, the amenity rate is slightly reduced from 1.60 square metres per unit to 1.28 square metres per unit.

The building design is otherwise generally the same, being massed and oriented towards High Street, with a pre-cast construction method and energy efficient features. This practical design facilitates a functional and affordable development that facilitates the provision of affordable units.

Ground Floor Configuration

The revised proposal refines the ground floor layout to remove the underground parking ramp and reconfigure the bicycle parking areas. Minor refinements were also made to the location and sizing of loading spaces, garbage room, and resident amenity spaces. There is no change to the proposed building access, which is maintained from High Street, with vehicle pickup/dropoff access at the rear and continuous pedestrian pathways around the building.

Unit Mix

With the increase in building height, the unit mix is revised from 432 to a total of 540 residential units. At 50% affordability, this is an approximate increase from 216 to 260 affordable units. In the revised proposal, unit sizes range from 274-370 square metres (2,949-3,982 square feet) for Studio, 453-500 square metres (4,876-5,382 square feet) for One-bedroom, and 631 square metres (6,792 square feet) for Two-bedroom. Each residential floor has 18 units, including 13 Studio, 4 One-bedroom, and 1 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 pickup/dropoff 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 a total of 333 spaces. 116 long-term and 25 short-term bicycle parking spaces are located on the ground floor and 192 long-term spaces are located in the rear yard. 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.

The rear yard bicycle spaces are provided in a unique WÖHR Bikesafe bicycle storage structure. The WÖHR Bikesafe is an automated, space saving system for long-term bicycle storage that consists of above- and below-ground storage. Residents will pickup and dropoff bicycles via an automated gate but do not enter the structure. The structure will be designed with a quality exterior and enhanced or screened with a landscape treatment. Exact dimensions of the structure are to be determined but the structure will be approximately the same height as a landscaping pergola. Due to sizing, the location of the structure requires a small portion to overlap with the rear yard of the

Applicant's comprehensively planned 57-75 Wellington Road development and will need to be addressed in the implementing Zoning By-law Amendment.

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

Table 1 - Revised Site Statistics

DEVELOPMENT CHARACTERISTIC	DESCRIPTION
Total Site Area	1,823 m ² (0.18 ha; 0.45 ac)
Building Footprint	693 m ² (7,460 ft ²)
Gross Floor Area (GFA)	19,583 m ² (210,788 ft ²)
Floor Area Ratio (FAR)	10.74
Density (UPH)	2,960
Lot Coverage	38%
Landscaped Open Space	10%
Total Units	540
Unit Mix	390 Studio; 120 One-bedroom; 30 Two-bedroom
Resident or Visitor Parking Spaces	None
Pickup/Dropoff Spaces	7
Short-Term Bicycle Parking	25 Spaces (0.05 per unit)
Long-Term Bicycle Parking	308 Spaces (0.57 per unit)
Loading Spaces	2 (1 Type A, 1 Type G)
Amenity Space	689.8 m ² (7,425 ft ²) or 1.28 m ² per unit
Height	31 Storeys (99.6 m)
Front Yard Depth	3.5 metres (from main wall of building) 1.8 metres (from extent of balcony structure)
Interior Yard Depth	3.0 metres (north) 6.4 metres (south)
Rear Yard Depth	12.29 metres
Tower Separation (to 57-75 Wellington Road 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 June 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% (216 units) provision of affordable rental units is subject to the receipt of expected grants and loans, whereas the 10% provision (54 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 the 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 June 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. As noted, the Applicant has an active planning application for the residential properties immediately east and abutting the Subject Lands (57-75 Wellington Road

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

and 68 High Street; City File OZ-26078). 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 31 storeys, the Proposed Development is intended to support transition westward from Wellington Road, in coordination with the Applicant's adjacent 57-75 Wellington Road application. The 57-75 Wellington Road application was reduced to 21 storeys (from 27) and the Proposed Development was increased to 31 storeys (from 25), which shifts relative height from the Wellington Road corridor to High Street. Oriented towards High Street, the Proposed Development interfaces with an existing apartment neighbourhood with established vehicle access. The increase of height is generally mitigated by a more minor 1.5% increase in GFA for the Proposed Development and a related 29% decrease in GFA for the comprehensively planned 57-75 Wellington Road application.

The revised proposal attempts to facilitate an enhanced street condition (via functional walkways, increased setbacks, reduced lot coverage, unit balconies, and fourth storey step-back), support transition between neighbouring uses, and generally maintain a similar level of intensification as contemplated within London's City structure. A maximum lot coverage of 38% is proposed, excluding accessory structures, whereas a maximum lot coverage of 80% is permitted in the Zoning By-law.

Regarding Provincial policy direction on settlement areas, the Provincial Planning Statement (PPS) prioritizes growth and development to 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. The revised proposal maintains a level of intensification consistent with PPS direction on growth and does so with new design intent to facilitate transition, enhanced public realm, and continued delivery of affordable housing.

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 City structure, the Subject Lands are located in an appropriate area for intensification and the proposed 31-storey design supports the planned vision of the Rapid Transit Corridor Place Type. 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 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 revised proposal is increased in height but generally maintains the same intensification (as measured in GFA or FSI), in line with the planned City structure. The Proposed Development creates a variety of heights along the Wellington LRT corridor and facilitates approximately 270 affordable units.

Per the Official Plan, 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 540 units or an approximate population of 760². 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 57-75 Wellington Road application (City File: OZ-26078). Buildings are encouraged to create a pedestrian-oriented street wall (841_2), with articulation and animation to support the pedestrian environment (841_3). The Proposed Development was revised to enhance the pedestrian environment through a reduced ground floor and building coverage, the addition of unit balconies, and the addition of a fourth storey setback. To accommodate these design considerations and continue to deliver a high number of affordable units, additional height has been added with only a minor 1.5% increase in FSI. The revised design intends to balance the City goals for affordable housing, urban design, and growth management.

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

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)

affordable housing, the Proposed Development's height and density is considered more modest than these approved precedents.

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

Address	Zone	Height	Residential Density (FAR)	Building Coverage
60-68 High Street (the Subject Lands)	TSA1	99.6m (31-storeys)	10.74	38%
57-75 Wellington Road (by the Applicant)	TSA1	69.5m (21-storeys)	10.57	55%
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, where intensification on site will use existing capacity in municipal services and avoid 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. Additionally, the Applicant's adjacent high density redevelopment, may further concentrate available services and result in increased municipal efficiency.

Regarding Provincial direction on efficient development, the PPS generally emphasizes development at densities that efficiently use 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.

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).

The residential density of the Proposed Development is 2,960 units per net hectare. There is no maximum density in the City of London 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 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 – especially when considered alongside the Applicant’s adjacent application. 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 targets 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 increased height of 31-storeys and resulting increased unit count, the revised Proposed Development will now provide approximately 270 affordable units. This is an approximate increase of 25% more affordable units from the previous concept. 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 housing alternatives (513 _). The pre-cast 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 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:

- Permit a south interior side yard of 6.4 metres at the second floor (8.1 metres at ground level)
- Permit a rear yard of 0.0 metres to accessory bicycle structure
- Permit a height of 99.6 metres
- Permit a floor area ratio of 10.74
- Permit an amenity area rate of 1.28 square metres per residential unit
- Permit a long-term bicycle parking space rate of 0.57 spaces per residential unit
- Permit a short-term bicycle parking space rate of 0.05 spaces per residential unit

Table 3 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 3 – 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	1,823m ²
TSA1	Lot Frontage (min)	30m	48m
TSA1	Front Yard Depth (min-max)	1.0m-3.5m	1.8 metres to extent of balcony structure 3.5 metres to main wall of building
TSA1	Exterior Yard Depth	N/A	N/A
TSA1	Interior Yard Depth (min)	3.0m 17.5m (where abutting a Residential zone)	3.0m (north) 6.4m at the second floor (south) 8.1m at the ground floor (south)
TSA1	Rear Yard Depth (min)	7.5m 17.5m (where abutting a Residential zone)	12.29m to main wall of building 0.0m to accessory bicycle structure
TSA1	Landscaped Open Space (min)	10%	10%
TSA1	Lot Coverage (max)	80%	38%
TSA1	First Storey Height (min)	4.0m	4.25m
TSA1	Height (min-max)	8.0m – 82.0m	99.6m
TSA1	Residential Density (min)	45 UPH	2,960 UPH
TSA1	Floor Area Ratio (max)	6.5	10.74
TSA1	Gross Floor Area Office (max)	5,000m ²	N/A
TSA1	Amenity Area (min)	6.0m ² per residential unit	1.28m² per unit
TSA1	Step Back	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 more than 40 res. units)	N/A
General Provisions	Bicycle Parking (Short-Term) (min)	0.1 spaces per unit	0.05 spaces per unit
General Provisions	Bicycle Parking (Long-Term) (min)	0.9 spaces per unit	0.57 spaces per unit

As discussed in the June 2026 PJR, 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 be considered against the minimum depth of 7.5 metres, rather than the more restrictive rear yard depth. The Proposed Development meets and exceeds the minimum rear yard depth of 7.5 metres.

As further discussed in the June 2026 PJR, Zoning By-law Section 52 identifies conditional regulations for interior yard depths depending on context. The minimum interior yard depth is 3.0 metres⁹ and there is a more restrictive interior yard depth required where abutting any lands zoned R1, R2, or R3¹⁰. The abutting use to the south is an existing, non-conforming apartment building (5 units) within the R3-2/h-13/TSA1 zone. As the existing use (apartment building) is not permitted in the R3-2 zone (nor R1 or R2), we suggest that the Proposed Development should be considered against the minimum depth of 3.0 metres, rather than the more restrictive side yard depth. The Proposed Development meets and exceeds the minimum side yard depth of 3.0 metres.

And as noted in Section 2.0 above, a unique WÖHR Bikesafe bicycle storage structure is proposed in the rear yard. A rear yard setback of 0.0 metres to an accessory structure is required to facilitate the siting of this structure.

⁷ Zoning By-law 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 Zoning By-law 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.*”

⁹ Zoning By-law Table 52.3 (TSA Zone Regulations)

¹⁰ See Footnote 4 above (Section 52.3.2)

4.0 CONCLUSION

This PJR Addendum should be read in conjunction with the original PJR dated June 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 conform 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,

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