

Report to Planning and Environment Committee

To: Chair and Members
Planning and Environment Committee

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

Subject: Highland Communities Ltd.
978 Gainsborough Road
File Number: OZ-9247, Ward 7

Date: November 13, 2023

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of Highland Communities Ltd. relating to the property located at 978 Gainsborough Road:

- (a) the request to amend the Official Plan, The London Plan, for the City of London by **AMENDING** a site-specific policy for the Neighbourhoods Place Type to allow a maximum density of 370 units per hectare and a maximum height of 17-storeys, **BE REFUSED**;
- (b) the request to amend Zoning By-law No. Z.-1 to change the zoning of the subject lands **FROM** a Holding Residential R9 Special Provision (h-5.h-11.h-17. R9-7(17).H50) **TO** a Holding Residential R9 Special Provision (h-5.h-11.h-17. R9-7().H60 Zone to permit the development of two, 17 storey residential apartment buildings interconnected by a 6-storey podium with a total of 481 residential units, **BE REFUSED**;

IT BEING NOTED that the above noted requested amendments are being recommended for refusal for the following reasons:

- i) The proposed development is not consistent with the Provincial Policy Statement, 2020, which promotes intensification and redevelopment in appropriate locations and encourages sustainable and transit-oriented communities.
- ii) The proposed development does not conform to the Official Plan, The London Plan, for the City of London including, but not limited to, the Key Directions, City Design policies, Intensity and Form policies of the Neighbourhoods Place Type, and Our Tools policies.
- iii) These lands were recently subject of a site-specific appeal to The London Plan where the Ontario Land Tribunal determined, in May 2022, to allow a site-specific policy to permit 17-storeys and a density of 150 units per hectare to acknowledge the existing 2013-approved zoning on the site, where the High Density Residential overlay would only permit up to 12 storeys in height.
- iv) The proposed increase to 370 units per hectare would further deviate from the planned function of the Neighbourhoods Place Type without planning or policy justification and does not meet the evaluation conditions of Specific Area Policies in The London Plan, including not being sufficiently unique to not establish an argument of precedent for similar exceptions for high-density, high-rise buildings outside of the Built Area Boundary.
- v) The existing site-specific policy and in-force zoning on the property already allow for a significant amount of development to occur on the site, including a residential tower in addition to other mid-rise and low-rise forms.
- vi) The property does not currently have public street frontage or a long-term access or servicing solution and associated easements in place.
- vii) The subject site with the proposed intensity and form, given its location outside the Primary Transit Area and Built Area Boundary, is not appropriate and is not good planning.

Executive Summary

Summary of Request

The applicant has requested to amend a site-specific policy within the Neighbourhoods Place Type to allow a maximum density of 370 units per hectare, where 150 units per hectare is permitted through a recent decision of the Ontario Land Tribunal, and to maintain the maximum height of 17-storeys.

The applicant has also requested to rezone the subject site **FROM** Holding Residential R9 Special Provision (h-5.h-11.h-17. R9-7(17).H50) **TO** a Holding Residential R9 Special Provision (h-5.h-11.h-17. R9-7().H60) Zone to permit the development of two, 17 storey residential apartment buildings interconnected by a 6-storey podium with a total of 481 residential units.

Purpose and the Effect of Recommended Action

The purpose and effect of the recommended action is to refuse the request to amend Specific Policy Area 1077C_4. of The London Plan and rezone the subject lands to a Residential R9 Special Provision (R9-7(_)) Zone to facilitate the development of two, 17 storey residential apartment buildings at a density of 370 units per hectare.

Linkage to the Corporate Strategic Plan

This recommendation supports the following Strategic Areas of Focus:

- **Wellbeing and Safety**, by promoting neighbourhood planning and design that creates safe, accessible, diverse, walkable, healthy, and connected communities.
- **Housing and Homelessness**, by ensuring London's growth and development is well-planned and considers use, intensity, and form.
- **Housing and Homelessness**, by increasing access to a range of quality, affordable, and supportive housing options that meet the unique needs of Londoners.

Analysis

1.0 Background Information

1.1 Previous Reports Related to this Matter

Hyde Park Community Plan, December 15, 1999

Z-7399 – Planning Committee Report, December 10, 2007, and January 14, 2008

Z-8178 – Planning Committee Report, August 20, 2013, and November 26, 2013

1.2 Planning History

December 2013, Council approved a Zoning By-law amendment to permit two 15-storey apartment buildings at a maximum height of 50 metres and density of 150 units per hectare. Special provisions were also approved to allow for the reduction of the easterly side yard to 12 metres and a maximum projection into the required yard for apartment balconies to a maximum of 3 metres. Three holding provisions were also included to ensure that access and sanitary servicing concerns are addressed prior to the development of the site and that public site plan be required. This Zoning By-law amendment was approved under the framework of the 1989 Official Plan, prior to The London Plan being adopted by Council in 2016.

Through the development of The London Plan, the property was designated Neighbourhoods. The London Plan also identified the site on Map 2 – High Density Residential Overlay, which acknowledges properties that were previously zoned for high density, but no longer conform to the framework of The London Plan. London Plan policy 958 states that up to 12 stories in height and 150 units per hectare may be permitted for properties in the High-Density Residential Overlay outside of the Primary

Transit Area.

December 2021, a report was tabled for Planning Committee to refuse a Zoning By-law amendment to permit two, **20-storey**, apartment buildings interconnected by a 4-storey podium, with a total of 373 residential units, 477 parking spaces, and a density of **287 units per hectare**. The applicant requested a deferral of the application to revise the application to address staff's and public concerns.

As part of The London Plan appeals and settlements in May 2022, Site Specific Policies in the High Density Residential Overlay were added for many properties, including the subject site, to specifically protect for the height and density currently permitted through zoning where it is no longer consistent with The London Plan, including the High Density Residential Overlay policies. The argument was accepted that the current 50 metre zoned height could accommodate 17 storeys. The site-specific policy for the subject property is:

*1077C_4. For the lands located at 978 Gainsborough Road, a maximum density of **150 units per hectare** and a maximum height of **17 storeys** will be permitted.*

The current revised application was submitted in May 2023, requesting an Official Plan and Zoning Bylaw amendment to permit **two 17-storey** apartment buildings, 60 metres tall, interconnected by a 6-storey podium, with a total of 476 residential units and a density of **370 units per hectare**.

1.3 Property Description and Location

The subject lands are located south-east of Hyde Park Road and Gainsborough Road within the Hyde Park Hamlet area. Currently, the site is undeveloped and is surrounded by a 14-storey apartment building to the south, undeveloped lands and residential use to the east, commercial use to the north, and a single detached dwelling and commercial use to the west. The site does not have street frontage and access is proposed through a future private laneway.



Figure 1: Subject site and surrounding context



Figure 2: Apartment building and townhomes to the south



Figure 3: Office to the north

As mentioned previously, to the west is a single detached dwelling located at 1006 Gainsborough Road. This property is listed on the Register, however, has not been evaluated using Ontario Heritage Act Regulation 9/06.



Figure 4: Listed Property at 1006 Gainsborough Road

Site Statistics:

- Current Land Use – undeveloped
- Frontage (on future private laneway) – 131.5m

- Depth – 87.3m
- Area – 1.3 ha
- Shape – rectangular
- Located within the Built Area Boundary: No
- Located within the Primary Transit Area: No

Surrounding Land Uses:

- North – commercial use
- East – undeveloped property and residential use
- South – apartment building and townhomes
- West – singled detached dwelling and commercial use

Existing Planning Information:

- Existing London Plan Place Type: Neighbourhoods Place Type, no street frontage
- Existing Special Policies: High Density Residential Overlay, Hyde Park Community Plan
- Existing Zoning: Holding Residential R9 Special Provision (h-5*h-11*h-17*R9-7(17)*H50)

Additional site information and context is provided in Appendix A.

2.0 Discussion and Considerations

2.1 Initial Proposal

The initial proposal submitted in July 2020 consisted of two, 20 storey residential apartment buildings interconnected by a 4-storey podium with a total of 400 residential units.

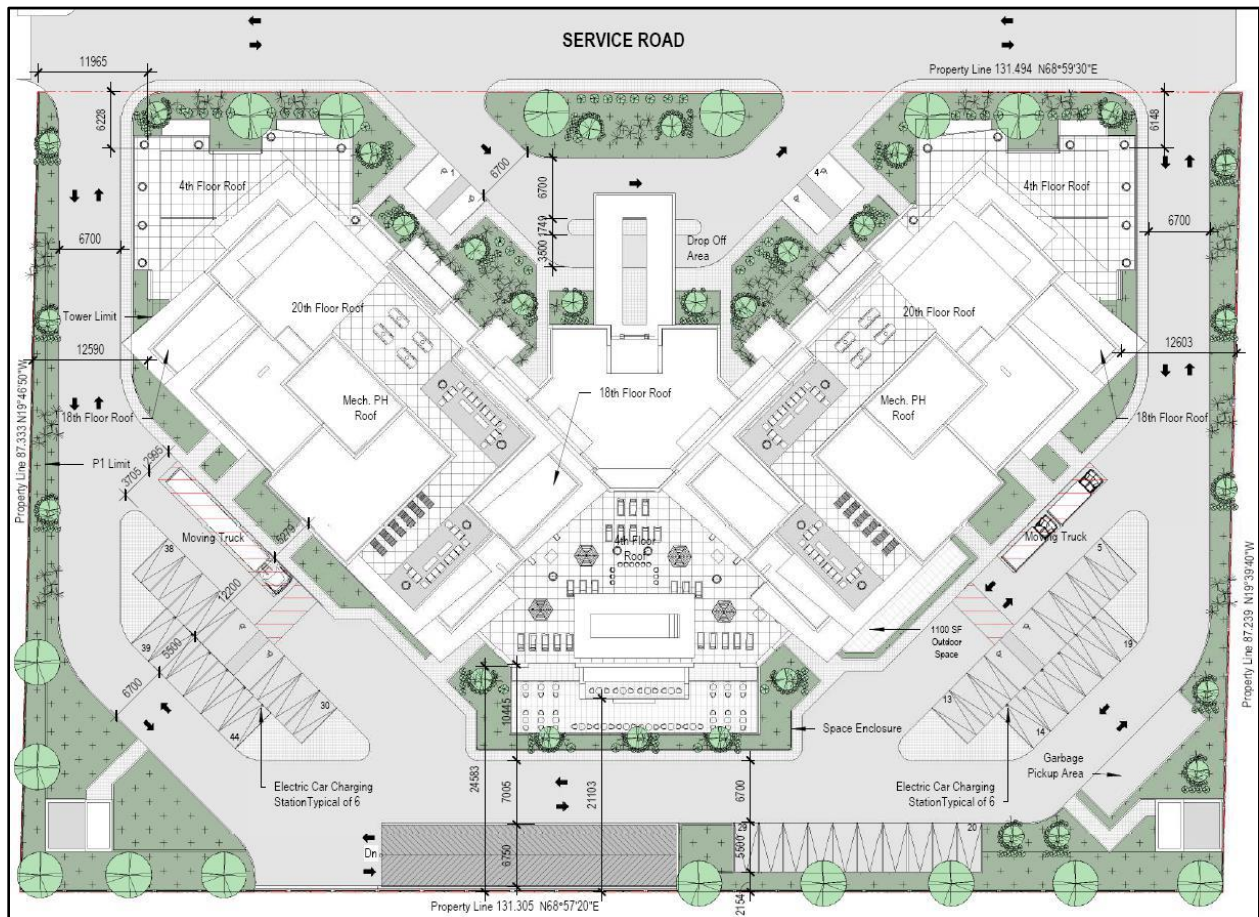


Figure 5: Initial Site Plan (July 2020)



Figure 6: Initial Design (20-storeys with a density of 308 uph) – Front Rendering

This application was revised and consisted of two, 20-storey residential apartment buildings interconnected by a 4-storey podium with a total of 373 residential units and a density of 287 units per hectare.

Vehicular access was proposed to be provided from a single, full-turn driveway through the adjacent property at 982 Gainsborough Road, in the interim. The long-term access was proposed to be from a private rear laneway system located to the north of the proposed development that will ultimately connect with the north leg of Sophia Crescent, extend westerly, and continue south along the rear of properties fronting on Hyde Park Road. A 12m public access easement will be established over the laneway, which is anticipated to extend through the subject lands.

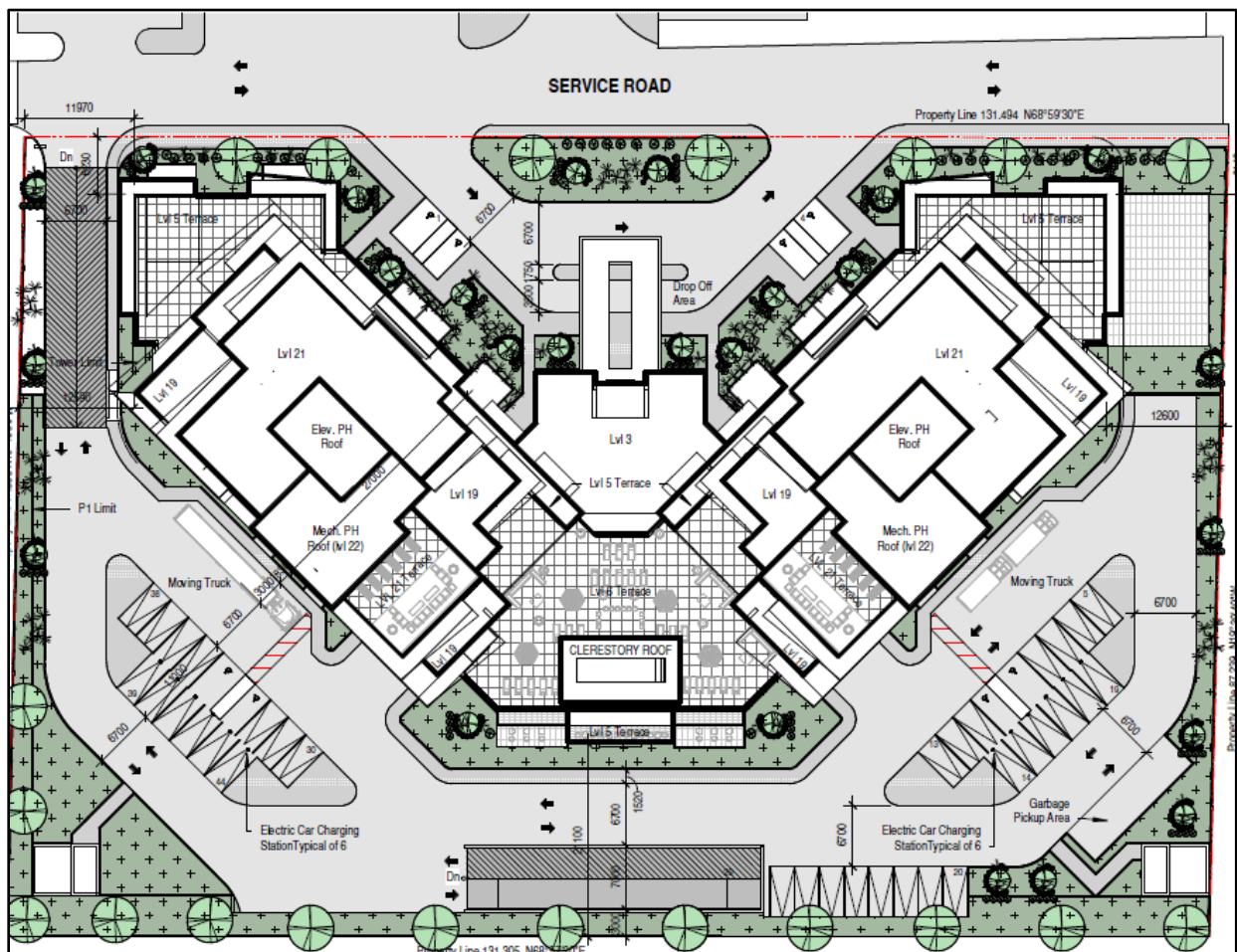


Figure 7: Revised Site Plan



Figure 8: Revised Proposal (20 storeys with a density of 287 uph) – Front Rendering

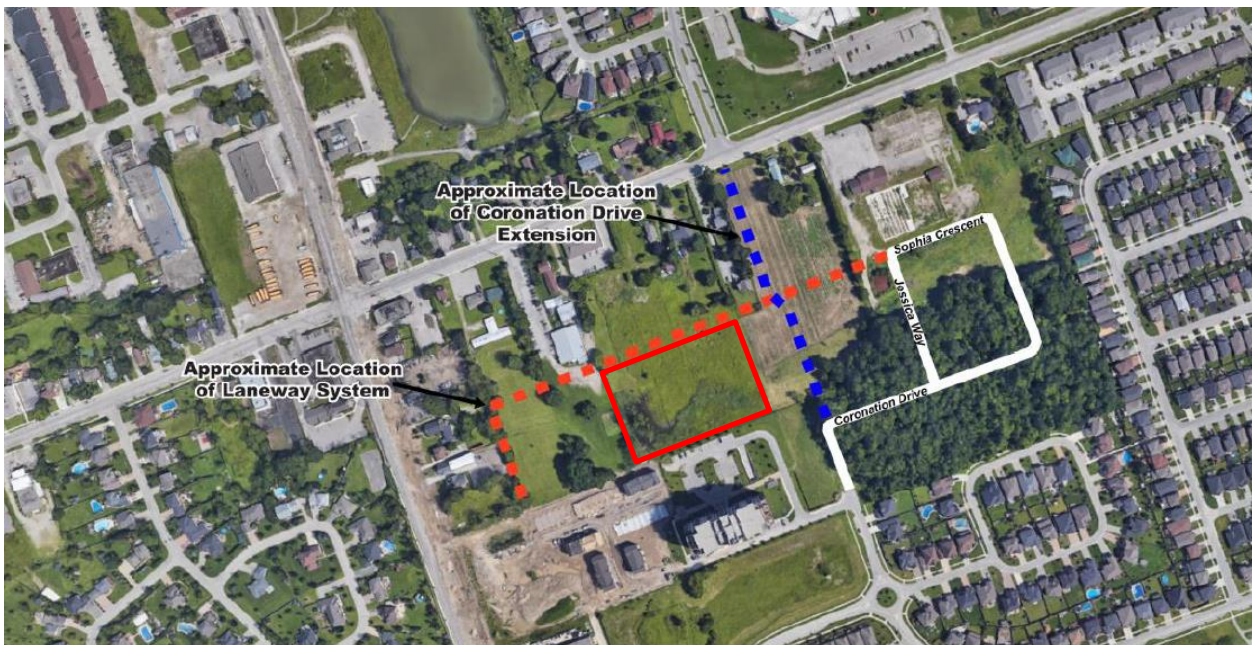


Figure 9: Planned rear lane and Coronation Drive connection

Through the review of the application, staff raised several concerns with respect to the proposed intensity and form of the site. In addition, the number of special provisions required to facilitate the proposed development were concerning, as these can often be indicative of overdevelopment.

2.2 Current Proposal

The current proposal (third submission) consists of two, 17-storey residential apartment buildings interconnected by a 6-storey podium with a total of 481 residential units and a density of 370 units per hectare.

Vehicular access will continue to be provided via Gainsborough Road through 982 Gainsborough Road (via easement), until such time that a future private laneway along the north property line will provide public access to the surrounding area. Two, two-way driveways along the east and west side of the subject lands are provided. Parking is provided via two levels of underground parking and within five levels of the 6-storey podium.

A total of 506 parking spaces are provided, which consists of 494 standard parking spaces and 12 barrier-free parking spaces. A total of 356 parking spaces are located in two levels of underground parking. The remaining 150 parking spaces are located within the first five levels of the podium. A total of 503 bicycling parking spaces are provided within both the underground parking garage and the podium, and external to the

building.

The proposed development includes the following features:

- Land use: Residential
- Form: Apartment buildings
- Height: 17 storeys
- Residential units: 481
- Density: 370 units / hectare
- Building coverage: 38%
- Parking spaces: 506
- Bicycle parking spaces: 474 internal, 56 external
- Landscape open space: 30.7%

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

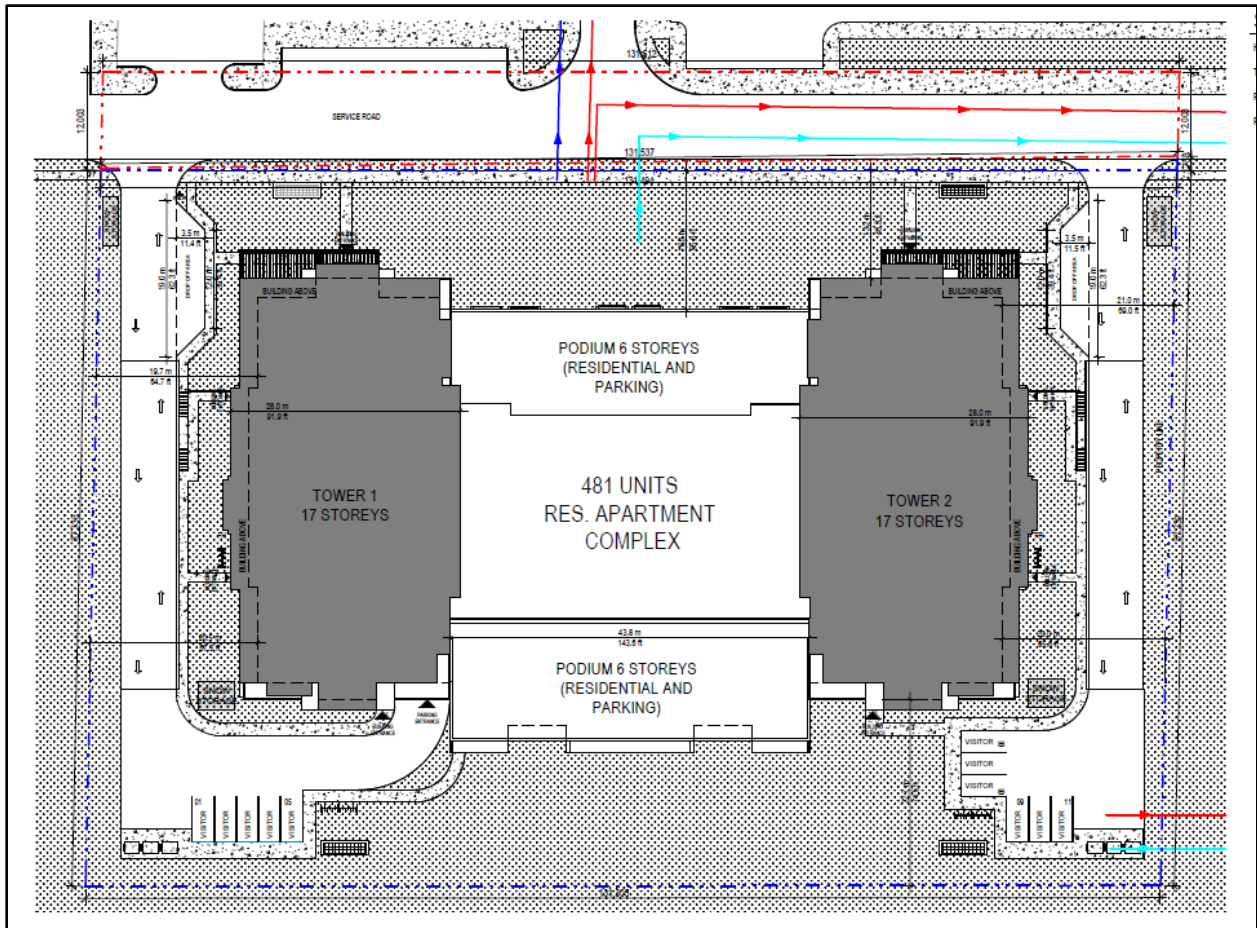


Figure 10: Current Site Plan



Figure 11: Current Proposal – Front / North Rendering

2.3 Summary of Proposal Changes

| Date | Height | Units | Density | Parking |
|---|---------------------|-------|---------|---------|
| 2013 (ZBA Approved) | 15 storeys (50m) | 195 | 150 | - |
| January 2020 (ZBA) | 20 storeys | 400 | 308 | 477 |
| October 2021 (ZBA Revised, Referred Back) | 20 storeys | 373 | 287 | 477 |
| May 2022 (OLT Decision) | 17 storeys | 195 | 150 | - |
| May 2023 (OZ Revised) | 17 storeys (60m) | 476 | 370 | 506 |

2.2 Requested Amendment(s)

The initial proposal submitted in July 2020 consisted of two, 20 storey residential apartment buildings interconnected by a 4-storey podium with a total of 400 residential units. Subsequently, this was revised to request two, 20-storey, apartment buildings interconnected by a 4-storey podium, with a total of 373 residential units at a density of 287 units per hectare, and 477 parking spaces. Through both concepts there was also a request to add a Bonus Zone for the increased density.

In May 2023, the applicant revised the requested amendment. The revised application requested to amend an existing site-specific policy, which was approved by OLT decision in May 2022, to allow a maximum density of 370 units per hectare, where 150 units per hectare is permitted, and maintain the existing maximum height of 17-storeys on the subject lands.

The applicant further requested to rezone the subject site from Holding Residential R9 Special Provision (h-5.h-11.h-17.R9-7(17).H50) to a Holding Residential R9 Special Provision (h-5.h-11.h-17.R9-7().H60 Zone to permit the development of two, 17 storey residential apartment buildings interconnected by a 6-storey podium with a total of 481 residential units. Special Provisions include: a minimum westerly interior side yard setback of 18.0m whereas 21.2m is required; a minimum rear yard setback of 17.5m whereas 21.2m is required; a maximum building height of 60.0m whereas 50.0m is permitted; a maximum lot coverage of 38% whereas 34% is permitted; and, a maximum density of 370 UPH whereas 150 UPH is permitted.

2.3 Internal and Agency Comments

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

Key issues identified by staff and agencies included:

- Access
- Private road
- Servicing
- Site functionality and design
- Intensity
- Parking

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

2.4 Public Engagement

Public notice was provided as part of the initial application on January 22, 2020, a revised notice of application for the second submission was provided on October 8, 2021.

There were 50 written comments received during the current proposal circulation. A summary of comments and concerns include the following:

- Shadow and wind effects
- Light

- Noise
- Increased traffic and pedestrian safety
- Height and density
- Too big for site and numerous changes required
- Access
- Buffering
- Sufficiency of Servicing Infrastructure
- Obstruction of view
- Type of tenancy
- Loss of property value
- Quality of life
- Does not meet the policies of the 'Neighbourhoods Place Type'

Further to the revised application sent out May 2023, there have been an additional 8 written comments received which oppose the development and include similar concerns as listed above.

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

2.5 Policy Context

The Planning Act and the Provincial Policy Statement, 2020

The Provincial Policy Statement (PPS), 2020 provides policy direction on matters of provincial interest related to land use planning and development. In accordance with Section 3 of the Planning Act, all planning decisions “shall be consistent with” the PPS.

Section 1.1 of the PPS encourages healthy, livable and safe communities which are sustained by promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term. The PPS directs settlement areas to be the focus of growth and development, further stating that the vitality and regeneration of settlement areas is critical to the long-term economic prosperity of our communities (1.1.3). As well, the PPS directs planning authorities to provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area (1.4.1).

The PPS encourages an appropriate affordable and market-based range and mix of residential types, including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons to meet long-term needs (1.1.1b)). The PPS also promotes the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs (1.1.1e)).

The PPS directs settlement areas to be the focus of growth and development. Land use patterns within settlement areas shall be based on densities and a mix of land uses which: efficiently use land and resources; are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion; minimize negative impacts to air quality and climate change, and promote energy efficiency; prepare for the impacts of a changing climate; support active transportation and are transit-supportive, where transit is planned, exists or may be developed (1.1.3.2). Land use patterns within settlement areas shall also be based on a range of uses and opportunities for intensification and redevelopment (1.1.3.2).

The subject site has already been identified through The London Plan Special Area Policy and existing zoning as an appropriate site for development up to 150 uph, as was confirmed by the Ontario Land Tribunal decision in May 2022. It is located in an area serviced by existing transit. As such, staff agree the site would be suitable for residential development; however, staff are also of the opinion that residential intensification in this location must be of an appropriate scale and density to meet the Province’s goals for a range and mix of housing options, efficient use of land, and transit-supportive development. Further, policy 1.7e) encourages a sense of place by promoting a well-

designed built form. While redevelopment and intensification of the subject lands would contribute to achieving a more compact form of growth, it is important that intensification is done in manner which is appropriate and is sensitive to the context of existing neighbourhoods. The application, as proposed, is not consistent with the PPS.

The London Plan

The London Plan provides Key Directions (54_) that must be considered to help the City effectively achieve its vision. These directions give focus and a clear path that will lead to the transformation of London that has been collectively envisioned for 2035. Under each key direction, a list of planning strategies is presented. These strategies serve as a foundation to the policies of the Plan and will guide planning and development over the next 20 years. Relevant Key Directions are outlined below.

The London Plan provides direction to build a mixed-use compact city by:

- Planning to achieve a compact, contiguous pattern of growth – looking “inward and upward”;
- Planning for infill and intensification of various types and forms to take advantage of existing services and facilities and to reduce our need to grow outward;
- Implement “placemaking” by promoting neighbourhood design that creates safe, diverse, walkable, healthy, and connected communities, creating a sense of place and character; and,
- Ensure a mix of housing types within our neighbourhoods so that they are complete and support aging in place. (Key Direction #5, Directions 1, 2, 4, 5).

The London Plan provides direction to make wise planning decisions by:

- Ensuring that all planning decisions and municipal projects conform with The London Plan and are consistent with the Provincial Policy Statement.
- Thinking “big picture” and long-term when making planning decisions – consider the implications of a short-term and/ or site-specific planning decision within the context of this broader view.
- Avoiding current and future land use conflicts – mitigate conflicts where they cannot be avoided.
- Ensuring new development is a good fit within the context of an existing neighbourhood.
- Ensuring health and safety is achieved in all planning processes. (Key Direction #8, Directions 1, 3, 8, 9, and 10).

Intensification Target

The London Plan includes an Intensification Target that 45% of all new residential development will occur within the Built Area Boundary, which is defined generally as the line circumscribing all lands that were substantively built out as of 2016. The Built Area Boundary was approved in the October 2020 Ontario Land Tribunal (formerly LPAT) decision for The London Plan.

The subject site is outside of the Built Area Boundary and would therefore not be considered intensification for the purposes of achieving the 45% intensification target.

The London Plan also includes a Primary Transit Area (PTA), which is identified as the focus of residential intensification and transit investment within London (TLP 90). The PTA is also planned to have a heightened level of pedestrian and cycling infrastructure to service and support active mobility and strong connections. Directing infill and intensification to the PTA is a major part of The London Plan’s strategy to manage growth in the city as a whole and to achieve the 45% intensification target.

The subject site is outside of the Primary Transit Area and therefore is not planned to have a heightened level of active transportation and transit amenities to support significant population growth in a way that reduces automobile reliance (TLP 91).

High Density Residential Overlay (From the 1989 Official Plan)

The London Plan recognizes High Density Residential areas that were designated in the previous Official Plan. Map 2 identifies these lands as High Density Residential Overlay (from 1989 Official Plan) and permits high-rise buildings, in addition to the policies of the underlying Urban Place Types identified in Map 1 (955).

Outside the Primary Transit Area residential development may be permitted up to 12 storeys in height and at a density of up to 150 units per hectare on lands within the High Density Residential Overlay (from 1989 Official Plan) (958_2).

The London Plan directs those large areas within the High-Density Residential Overlay (from 1989 Official Plan) capable of accommodating multiple buildings, should include a diversity of housing forms such as mid-rise and low-rise apartments and multiple attached dwellings (958_3).

Where Specific Policies are established for lands within the High Density Residential Overlay (from 1989 Official Plan), and there is a conflict between those policies and the parent High Density Residential Overlay (from 1989 Official Plan) policies, the Specific Policies shall prevail (958_5).

Neighbourhoods Place Type and Site Specific Policy

The subject site is in the Neighbourhoods Place Type of The London Plan and does not have frontage on any street but is planned in the long-term to be accessed from Coronation Drive via a private laneway. Coronation Drive is a future Neighbourhood Connector. Table 10 – Range of Permitted Uses in Neighbourhoods Place Type, would permit up to 3 storeys in this location.

However, the site is subject to a site-specific policy within the High Density Residential Overlay that permits a maximum density of 150 UPH and a maximum height of 17-storeys on the subject lands (TLP 1077C_4). This site-specific policy was approved by the Ontario Land Tribunal in May 2022, as part of The London Plan appeals. Within this height and density the applicant could develop up to 195 new residential units.

Hyde Park Community Plan/Urban Design

The Hyde Park Community Plan was adopted by Municipal Council on April 17, 2000. The plan is based on a vision of creating a healthy, functional and pleasing community environment where a mixed-use environment will be created. The Hyde Park Community Plan focuses on the streetscape, integration of natural heritage features, a range of housing forms and lot sizes, well connected and linked open space and the creation of a mixed use "main street" environment in the Hyde Park hamlet.

Section 4.0 of the Hyde Park Community Plan outlines the building design guidelines for the high-density residential development area. The section states that the Hyde Park Community should have a high quality of both urban and architectural design providing a mix of housing forms. The guidelines do not advocate a particular architectural design but provide for a variety of architectural expressions with attention focused to building elements and the streetscape.

The Hyde Park Community Plan encourages higher densities around the proposed Business District to encourage higher densities within walking distance of the hamlet commercial area.

3.0 Financial Impact/Considerations

None.

4.0 Key Issues and Considerations

4.1 Land Use

As noted above, this site is within the Neighbourhoods Place Type, with ultimate

frontage to Coronation Drive (a Neighbourhood Connector) via a private shared laneway. A range of residential building types are permitted in Neighbourhoods, with up to triplexes permitted on Neighbourhood Connectors. However, this property is subject to a site-specific policy which allows up to 17 storeys in height, which can facilitate apartment buildings.

Staff have no concern with the proposal for residential apartment buildings on the site. However, the proposed development represents a level of intensity that is inconsistent with the established land use pattern and surrounding area. Discussion about the intensity of development is provided below.

The City Structure Plan establishes a framework for where these types of high-rise apartment buildings are to be located, including the Primary Transit Area. Intensification will be directed to appropriate place types and locations within the Primary Transit Area and will be developed to be sensitive to, and a good fit within, existing neighbourhoods. (90_*).

The site is not located within the Primary Transit Area identified for increased intensification and the proposed intensification of the residential use is not consistent. As noted, the apartment building 'use' is considered an appropriate land use in the 'Neighbourhood' Place Type for the subject site; it is the scale and intensity of the apartment building use that is not supported.

The in force specific area policy and zoning on the site already support apartment building(s) up to 17 storeys.

4.2 Intensity

The City of London has identified appropriate locations and promoted opportunities for intensification and redevelopment through Official Plan policies that establish a hierarchy within the Urban Growth Boundary. Furthermore, Council specifically identified areas where higher intensity will be directed which includes a system of nodes and corridors within the Primary Transit Area in The London Plan.

Within the City Structure Plan of The London Plan, the framework for growth and change over the planning horizon establishes a clear and strategic hierarchy for development intensity inside the Urban Growth Boundary. In reference to the identified areas above, it places a high level of importance on growing "inward and upward" (Policy 79_), while directing the "most intensive forms of development to the Downtown, Transit Villages and at station locations along the Rapid Transit Corridors (Policy 86_*) along with the objective that 75% of intensification will occur within the PTA."

The subject site is located within the Urban Growth Boundary but outside of the Built Area Boundary (BAB) and the Primary Transit Area (PTA). The London Plan contemplates intensification where appropriately located and provided in a way that is sensitive to and a good fit with existing neighbourhoods (83_, 937_, 939_2 and 5, and 953_1).

The Neighbourhoods Place Type does not contemplate this level of intensification on a Neighbourhood Connector street. The intensity of the site was approved through a Zoning Bylaw amendment decision in 2013 to increase height and density to 15 storeys (50m) and 150uph, under the 1989 Official Plan planning framework.

In 2016, The London Plan added this property to High Density Residential (HDR) overlay on Map 2, to acknowledge the existing high-density zoning and allow for up to 12 storeys in height, despite the underlying Neighbourhoods Place Type. The HDR Overlay policies remained under appeal for multiple site-specific properties. Through the appeal settlement hearings, the applicant requested that the existing 1989 Official Plan policies and in force zoning regulations on the site be recognized through a site-specific policy in the Neighbourhoods Place Type. The Ontario Land Tribunal provided a decision in May 2022 that recognized the existing zoning on the site and permitted up to 17 storeys and 150 units per hectare in a site-specific policy. It was determined that 17 storeys was possible under the existing 50m height regulations. The applicant did not request the OLT to consider heights or densities beyond 150 units per hectare, despite

the zoning amendment application for 287 units per hectare being active at the time.

Staff do not have concerns with the proposed 17-storeys; however, do have concerns with the intensity of the proposed development and its overall appropriateness for the site. The original application (2020) at 20-storeys proposed 373 units was referred back to staff at the applicant's request so they could address staff and public concerns about scale and intensity, the revised application is now seeking a further increase to a total of 481 units which is 108 units more than the original proposal, or 286 units more than is permitted in the current zoning and OLT approved specific area policy. This increase in intensity results in additional impacts which will continued to be discussed throughout the report.

As noted above, the subject lands do not have legal frontage on a higher order street where greater levels of intensity should be located. The site is a land locked parcel, rather than at an intersection, and is therefore not at a strategic location for additional density. The location also makes it is more difficult to mitigate the impacts of the proposed intensity. Appropriate long-term access arrangements, safe pedestrian circulation, and adequate programmable amenity space have not been provided to accommodate the significant increase in population and vehicle and pedestrian volumes.

Policy 1730 and 1731 of Our Tools in the London Plan provides conditions for approving new or amended specific area policies.

The proposal does not meet all other policies of the plan (1730_1), in particular the City Structure Plan and Growth Framework that direct significant development to urban areas planned for high levels of intensification, and the High Density Residential overlay policies which direct a diversity of housing forms on large HDR Overlay sites.

- The proposal does have an adverse impact on the integrity of the Neighbourhoods Place Type (1730_2) as it establishes a precedent for high-rise built forms within the interior of neighbourhoods, and outside of the built area boundary.
- The proposal to exceed the existing specific area policy density is not sufficiently unique and distinctive (1730_3) to not establish the argument for significantly higher intensities outside of the Built Area Boundary in the surrounding area and across the city. The existing specific area policy to recognize the in-force zoning on the property, did meet this distinctiveness test.
- The proposal can be reasonably altered (1730_4) to incorporate a mix of building types at the densities contemplated in the specific area policy which would better transition to nearby low-rise areas in the Neighbourhoods Place Type.
- Staff are of the opinion that the proposal is not in the public interest or representing good planning (1730_5) as development has not been coordinated in an orderly way to ensure appropriate servicing and access; public concerns regarding adjacent impacts have not been reasonably addressed; and the appropriate amenities and services to support a walkable, transit-oriented community are not established.

Approval of the revised specific policy area would establish an argument of precedent (1731) for the creation of similar high-rise, high-density specific area policies within Neighbourhoods Place Type outside of strategic areas designated for intensification, and specifically in suburban locations outside of the Primary Transit Area and Built Area Boundary that are largely automobile-dependent.

Based on the policies mentioned above and the criteria for evaluating Planning and Development Applications, the site is not appropriate for this level of intensification. The request for the additional density does not conform to the City Structure Plan and represents an inappropriate level of intensification within the Neighbourhoods Place Type. The intensity is not in keeping with the key directions of The London Plan that

relate to the strategic location of more intensive forms of development.

4.3 Form

The London Plan encourages compact forms of development as a means of planning and managing for growth (7_, 66_) and encourages growing “inward and upward” to achieve compact forms of development (59_2, 79_). The London Plan also accommodates opportunities for infill and intensification of various types and forms (59_4). To manage outward growth, The London Plan encourages supporting infill and intensification in meaningful ways (59_8).

Within the Neighbourhoods Place Type, and according to the urban design considerations for residential intensification, compatibility and fit will be evaluated from a form-based perspective through consideration of the following: site layout in the context of the surrounding neighbourhood; building and main entrance orientation; building line and setback from the street; height transitions with adjacent development; and massing appropriate to the scale of the surrounding neighbourhood (953_2.a. to f.).

In addition to the Form policies of the Neighbourhoods Place Type, all planning and development applications will conform with the City Design policies of The London Plan (841_1). These policies direct all planning and development to foster a well-designed building form, and ensure development is designed to be a good fit and compatible within its context (193_1 and 193_2). The site layout of new development should be designed to respond to its context, the existing and planned character of the surrounding area, and to minimize and mitigate impacts on adjacent properties (252_ and 253_).



Figure 12 – Rendering of Proposed Building



Figure 13 – Rendering of Proposed Building



Figure 14 – Rendering of Rooftop Amenity Area

Staff are of the opinion that the following form and design concerns raised by City staff, the Urban Design Peer Review Panel and the public have not been adequately addressed.

- The proposed high-rise residential development lacks context and integration with the surrounding neighbourhood, as it is located farther away from the Gainsborough Road and Hyde Park Road intersection fronting onto an internal service lane. Therefore, the density envisaged along a corridor would not be appropriate in this context with the proposed building set back behind commercial development that fronts Gainsborough Road. Vehicle and pedestrian connectivity, navigability and amenity on the site have not been fully considered to create a safe environment that is pedestrian and transit friendly and street-oriented. The current layout is designed primarily around vehicular movements rather than a healthy and walkable residential living environment.
- The scale of the development at ground level as a six storey podium mass with main entrances and drop-off zones facing the interior side yards, and one large centralize vehicle entrance on the 'front' of the building does not create a pedestrian-friendly, street-oriented development or scale.
- Driveways, ingress/egress points (i.e. number of curb cuts from the service lane) should be reduced and consolidated to improve the pedestrian realm around the

building and provide space for outdoor amenity areas and landscaping.

- The only existing pedestrian connection from a public street to the site is a walkway through the parking lot of the commercial development to the north. The UDPRP identified that there may be challenges navigating to the development for deliveries and drop-offs given the only access currently proposed is through an easement on another site to the north and the property does not have its own street presence or frontage.
- Tower design should be slender and reduce overall impacts on the surrounding area. The floor plates of the towers are more than 1:1.5 length to width ratio creating wide towers with greater shadow and privacy impacts and lessening sky views and sunlight penetration.
- Large areas within the High Density Residential Overlay (from 1989 Official Plan), capable of accommodating multiple buildings, should include a diversity of housing forms such as mid-rise and low-rise apartments and multiple attached dwellings (958_3). The proposal is for one large monolithic building with two 17-storey towers and does not provide a variety of built forms that help to fit into the surrounding context, frame the public realm and create transition from high-rise forms to lower rise townhouse and single detached forms.

While the proposed built form offers some positive features, such as a podium design and tower separation, there are substantial revisions required to date that need to be addressed. The ultimate orientation of and access to the building is required to inform the site layout and functionality.

Furthermore, the site-specific zoning regulations requested indicate that the site is unable to accommodate the proposed intensity. The relief requested from the regulations cumulatively represent an over intensification of the site and a development form that should be located elsewhere.

Staff are of the opinion that a mix of buildings on the site, such as one high-rise along with mid-rise and low-rise forms, would be more appropriate and could be accommodated under the existing specific area policy and zoning which permits 17-storeys and 150 units per hectare (195 units).

4.4 Sanitary Servicing

Through the rezoning application in 2013, a holding provision for servicing was placed on the subject lands as at that time. The subject lands have consistently been identified as being tributary to a future municipal sanitary sewer, being the future extension of a 250 mm diameter sanitary sewer and future extension of Coronation Drive to the east of this site that would be extended north.

For this application, the applicant submitted a Servicing Feasibility Study for the proposed development. Environment and Infrastructure Services has reviewed the report and expressed concern that the applicant still has not demonstrated connections through easements on adjacent lands or through routes that could connect to the existing services at Coronation Drive. Sewer Engineering Department has advised that this development is premature based on the above and is not supported.

The sanitary servicing strategy for the area is under review by staff and requires the collaboration and coordination of several different property owners. This particular development requires an easement through a neighbouring private property for sanitary servicing to the site. No agreement has been secured at the time of writing this report and, therefore staff are of the opinion that this proposal is premature.

Additionally, the sanitary servicing of the adjacent properties at 1018 and 1006 Gainsborough Road will require easements over the subject property to accommodate the long-term servicing strategy for those properties.

Should Council resolve to approve this application, staff recommends holding provisions to address the servicing concerns on the site, such as the following:

h-() Purpose: To ensure that municipal servicing and easements are provided for 1018 and 1006 Gainsborough Road, this holding provision shall not be removed until a consent application has been approved to the satisfaction of the Approval Authority prior to site plan approval.

h-() Purpose: To ensure the orderly development of lands and the adequate provision of municipal services, the “h” symbol shall not be deleted until the required security has been provided for the development agreement or subdivision agreement, and Council is satisfied that the conditions of the approval of the plans and drawings for a site plan, or the conditions of the approval of a draft plan of subdivision, will ensure a development agreement or subdivision agreement is executed by the applicant and the City prior to development.

4.5 Long-term Vehicular Access

The applicant is proposing a singular interim access to the property through an easement over the property to the north which currently includes a medical building. The proposal includes parking for 506 vehicles that would be required to enter and exit through the existing drive aisle between the commercial building’s main entrance and their parking lot. There is no secondary access to the site. While Transportation staff have not raised concerns with the existing access on Gainsborough Rd, staff are concerned for the increase in pedestrian-vehicle conflicts given the number of vehicles planned for the site and the diverse needs and abilities of clientele of a medical building.

The applicant is proposing the long-term access to the site from future Coronation Drive via the planned private rear laneway to the north of the subject site. Staff have identified concerns with the long-term viability of constructing the private laneway due to grading issues (existing retaining walls) and the coordination and cooperation of several individual property owners along both Gainsborough Road and Hyde Park Road. Without access to Coronation Drive via the private laneway, long-term access to the site will be required to go through an adjacent private property and require an easement agreement. No agreement has been secured at the time of writing this report and, therefore staff are of the opinion that this proposal is premature.

Should Council resolve to approve this application, staff recommends a holding provision to address the access concerns on the site, such as the following:

h-() Purpose: To ensure a suitable access to a local road can be obtained by the owner as the site is landlocked and currently does not have any access to local roads, this holding provision shall not be deleted until access has been obtained, all to the satisfaction of the City.

4.4 Issue and Consideration #6: Zoning

The applicant has recommended several special provisions to the Residential R9 zone which include the following:

- a minimum westerly interior side yard setback of 18.0m whereas 21.2m is required;
- a minimum rear yard setback of 17.5m whereas 21.2m is required;
- a maximum building height of 60.0m whereas 50.0m is permitted;
- a maximum lot coverage of 38% whereas 34% is permitted;
- a maximum density of 287 UPH whereas 150 UPH is permitted.

Additionally, staff have identified the need for a special provision to allow for 0m of lot frontage, given that the property is not located on a public street and requires servicing and access through a neighbouring private property, that would need to be facilitated through a private easement agreement.

Regardless of the policy context, the combination of an increased height, density, coverage, and reduced side and rear yard setbacks and zero frontage is indicative of an over intensification of the property and is not an appropriate level or form of development.

The existing zoning on the site allows for 17 storeys and 150 units per hectare. The site is 1.3 hectares in size which is large enough to accommodate a variety of development forms while still achieving the required zoning provisions.

Conclusion

The proposed application is not consistent with the Provincial Policy Statement, 2020, which promotes intensification and redevelopment in appropriate locations, and does not conform to The London Plan, including, but not limited to, the Key Directions, City Design policies, Intensity and Form policies of the Neighbourhoods Place Type, and the Our Tools evaluation criteria for Specific Area Policies. The requested Official Plan Amendment, Zoning By-law Amendment, and proposed development represent an over-intensification of site with little effort made to mitigate impacts of the proposed increased intensity. As such, it is recommended the requested amendment be refused.

Prepared by: Alanna Riley, MCIP, RPP
Senior Planner, Planning Implementation

Reviewed by: Mike Corby, MCIP, RPP
Manager, Planning Implementation

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

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

Cc: Britt O'Hagan, Manager, Current Development
Michael Pease, Manager, Site Plans
Brent Lambert, Manager, Development Engineering

Appendix A - Site and Development Summary

A. Site Information and Context

Site Statistics

| | |
|-----------------------------|---------|
| Current Land Use | Vacant |
| Frontage | 131.5m |
| Area | 1.3 ha |
| Shape | Regular |
| Within Built Area Boundary | Yes |
| Within Primary Transit Area | No |

Surrounding Land Uses

| | |
|-------|----------------------------------|
| North | Commercial |
| East | undeveloped |
| South | Apartment building and townhouse |
| West | Single detached and commercial |

Proximity to Nearest Amenities

| | |
|----------------------------------|--|
| Major Intersection | Gainsborough Road and Hyde Park Road, 225m |
| Dedicated cycling infrastructure | Gainsborough Road, 130m |
| London Transit stop | Gainsborough Road 130m |
| Public open space | Van Horik Woods. 50m |
| Commercial area/use | Cherryhill Mall, 500 m |
| Food store | Ungers 100 m |
| Community/recreation amenity | Hyde Park Village Green |

B. Planning Information and Request

Current Planning Information

| | |
|--------------------------|---|
| Current Place Type | Neighbourhoods Place Type |
| Current Special Policies | Hyde Park Community Plan |
| Current Zoning | Holding Residential R9 Special Provision (h-5.h-11.h-17. R9-7(17).H50 |

Requested Designation and Zone

| | |
|----------------------------|---|
| Requested Place Type | N/A |
| Requested Special Policies | Permit two, 17-storey apartment buildings with a density of 370 uph |
| Requested Zoning | R9-7(_).H60 |

Requested Special Provisions

| Regulation (R8-4(_)) | Required | Proposed |
|-----------------------------------|----------|----------|
| Minimum interior sideyard setback | 21.2m | 18m |
| Minimum rear yard setback | 21.2m | 17m |
| Maximum height | 50.0m | 60.0m |
| Maximum lot coverage | 34% | 38% |

C. Development Proposal Summary

Development Overview

| |
|---|
| The subject lands are proposed to be developed for two, 17-storey, residential apartment buildings with a 6-storey podium containing a combined total of 48 |
|---|

residential units, with a density of 150 units376er hectare. 481 parking spaces are proposed within the podium. Common outdoor amenity areas are provided around the perimeter of the building and podium, and podium rooftop.

Proposal Statistics

| | |
|--|------------------------|
| Land use | Residential |
| Form | Apartment buildings |
| Height | 17 storeys (60 metres) |
| Residential units | 481 |
| Density | 376 units per hectare |
| Building coverage | 38% |
| Landscape open space | 30.7% |
| New use being added to the local community | No |

Mobility

| | |
|---|----------------------|
| Parking spaces | 481 |
| Vehicle parking ratio | 1.26 spaces per unit |
| New electric vehicles charging stations | Unknown |
| Secured bike parking spaces | 525 |
| Secured bike parking ratio | 1 space per unit |
| Completes gaps in the public sidewalk | N/A |
| Connection from the site to a public sidewalk | Yes |
| Connection from the site to a multi-use path | Yes |

Environmental Impact

| | |
|---|---------|
| Tree removals | 131 |
| Tree plantings | Unknown |
| Tree Protection Area | No |
| Loss of natural heritage features | N/A |
| Species at Risk Habitat loss | N/A |
| Minimum Environmental Management Guideline buffer met | N/A |
| Existing structures repurposed or reused | No |
| Green building features | Unknown |

Appendix B – Internal and Agency Comments

First Submission Comments

London Hydro

No objections

Parks Planning and Design

- Parkland dedication is required in the form of cash in lieu, pursuant to By-law CP-9 and will be finalized at the time of site plan approval.



MEMO

To: Alanna Riley, Senior Planner

From: Laura E. Dent, Heritage Planner

Date: November 18, 2021

Re: **Archaeological Assessment Requirements
Heritage Comments**

978 Gainsborough Road (Z-9247)

This memo is to confirm that I have reviewed the following and find the report's (analysis, conclusions and recommendations) to be sufficient to fulfill the archaeological assessment requirements for (Z-9247):

- Lincoln Environmental Consulting Corp. *Stage 1-2 Archaeological Assessment of 978 Gainsborough Road* [...] Middlesex County, Ontario (PIF P344-0409-2020), May 2020.

Please be advised that heritage planning staff recognizes the conclusion of the report that states that: "[n]o archaeological resources were identified during the Stage 2 archaeological assessment of the study area, and as such **no further archaeological assessment of the property is recommended.**" (p 2)

An Ontario Ministry of Heritage, Sport, Tourism, Culture Industries (MHSTCI) archaeological assessment compliance letter has not been received, indicating that this file may not have been identified for review by the Ministry.

Archaeological conditions can be considered satisfied for this application.

Sincerely,

Laura E. Dent, M.Arch, PhD, MCIP, RPP

Heritage Planner

Community Planning, Urban Design and Heritage
Planning & Development



MEMO

To: Alanna Riley, Senior Planner
From: Laura E. Dent, Heritage Planner
Date: November 18, 2021
Re: **Heritage Impact Assessment Requirements
– Heritage Comments
978 Gainsborough Road (Z-9247)**

This memo is to confirm that I have reviewed the following and find the report sufficient to fulfill the heritage impact assessment requirements for (Z-9247):

- Zelinka Priamo Ltd. (June 4, 2020). *Heritage Impact Assessment, 978 Gainsborough Road.*

978 Gainsborough Road (subject property) is adjacent to 1006 Gainsborough Road, a LISTED property on the City's *Register of Cultural Heritage Resources*.¹ A development consisting of two, 20-storey residential towers is being proposed on the subject property, and per *The London Plan* (policy 565_), potential impacts to adjacent properties LISTED on the *Register* must be evaluated to demonstrate that heritage attributes are conserved.

Specific supportable conclusions of the heritage impact assessment (HIA) are as follows:

- *If the adjacent property were to be designated, the proposed development would not have a negative impact on any potential heritage attributes.*
- *The location of the proposed development avoids overshadowing of the potential heritage property and there will be minimal impacts from its shadows.*
- *Site specific details, like fencing and on-site landscaping may be used to further screen the development, where appropriate. (p9)*

Based on the review of the HIA, heritage staff is satisfied that there will be no adverse impacts to the heritage resource located at 1006 Gainsborough Road as a result of the proposed development at 978 Gainsborough Road. The heritage resource is being retained and it is relatively remote to the proposed construction activity on the subject property. No mitigation measures have been recommended. The HIA can be accepted to meet complete application requirements for heritage (Z-9247).

Sincerely,

Laura E. Dent, M.Arch, PhD, MCIP, RPP

Heritage Planner
Community Planning, Urban Design and Heritage
Planning & Development

Urban Design Peer Review Panel Memo

The submission was lacking in contextual analysis to address how the development properly addresses the unique site condition, fits in with the neighbouring residential and commercial properties, sets a positive precedent for developing the service lane, and improves the pedestrian connections to the broader Hyde Park Commercial Area. The panel noted that the proposed development exhibits design attributes more characteristic of a large-scale commercial development (i.e. big-box), focused on ease of maneuvering for cars and services vehicles rather than a residential living environment for people. In this regard, the Panel noted that the design approach demonstrates a disregard for creating a habitable at-grade living experience. The Panel questions the allocation of any additional built height towards the current scheme. From a City Design perspective, the London Plan directs taller buildings towards locations in the city where they will more effectively contribute to the type of urban places being sought. Should additional density be required/desired on this site, it could be explored in a comprehensive redesign with a greater focus on the grade-level pedestrian environment and exceptional Urban Design. The Panel questioned the density being requested as the two towers lack proper tower separation (25m typical) and generally feel overbuilt for the site. The Panel questioned the V-shape and whether alternative designs were explored to better suit the site. The Panel expressed concern with the number of curb cuts along the service lane, 4 in total, none of which align with the commercial development to the north. This creates a convoluted vehicular circulation network and a vehicular dominant frontage. The Panel noted that the podium does not provide enough presence for the base of the building and requires further development to differentiate itself from the towers and establish a strong connection to the street.

Urban Design: September 21, 2021

- The application as proposed(20 storey high-rise residential development) does not meet urban design policies (both 1989 Official Plan and The London Plan) as the policy framework would encourage high-rise buildings closer to the street(along corridors) and with adequate setbacks or separation between the buildings.
 - The maximum height contemplated for Neighbourhoods Place Type with Type 2 bonusing is 6 storey.
 - Current Zoning permissions allows a maximum height of 50 m.
- Consistent with the previous staff and panel comments, there are concerns with the overall height, density and siting of the building being inconsistent with city design policies and urban design directions of both 1989 Official Plan and The London Plan.
 - The proposed high-rise residential development lacks context as it is located farther away from the Gainsborough Road and fronting the internal service lane. Therefore the heights and density envisaged along the corridor would not be appropriate in this context.
 - Envisage a pedestrian and transit friendly built form by providing an internal street network that allows for street oriented, walkable and pedestrian scale development. The current layout is designed primarily around vehicular movements rather than a healthy and walkable residential living environment.
 - Provide for a safe, convenient and direct pedestrian connections between the building entrances, amenity areas, parking stalls and leading to City Sidewalk along Gainsborough Road.
 - Explore opportunities to consolidate drive ways, ingress/egress points(i.e. reduce the number of curb cuts from the service lane) to improve the pedestrian realm around the building and provide space for outdoor amenity areas and landscaping.
 - Provide adequate separation distances between the proposed towers (a minimum of 25m) in order to reduce the overall impact of the building mass, improve sunlight penetration and increase access to sky views.
 - Increase the separation distances above 5th floor at the South East corner of 'East Building' and the South West Corner of 'West Building'. Alternatively explore alternate shapes or arrange the tower building(s) along North-South axis with adequate separation distances in order to minimize shadow and privacy impacts.
 - Enhance the podium design to have more presence on the ground to distinguish the podium and tower portion as well as to establish strong connection(s) to the street frontage along service lane and ultimately to the Gainsborough Road.

Development Services Engineering

Transportation

- Ensure service road is designed to the same specifications as the road behind the TSC, curb type, road width, etc.
- Show how accesses alignment with property to North
- Comments regarding accesses will be provided through the Site Plan process
- No dedication for this rear property

Water

Water requires that a holding provision be added on the new zoning until such time as it can be demonstrated that water servicing which meets the City of London Standards and Requirements can be met.

If the development proceeds without phasing under single ownership, then the requirement for looping must be met. Alternatively, if there is to be any phasing or any consideration for multiple ownership (i.e., each tower and or parking were to form

separate condos) then it is required that a municipal water service connection be made to a municipal water main for each building/separately owned entity.

This may be by extending separate water services for each building/separately owned entity to a municipal watermain on Gainsborough Road, or, by extending a municipal watermain in its ultimate alignment on Coronation Drive (Including property) and gaining access to connect to it.

It should be noted that the water servicing identified in the Preliminary Feasibility Study by Eng Plus does not meet City of London Requirements for water servicing.

It is requested that further information be provided wrt:

- The prospective future ownership is identified (1 owner, condos, multiple condos, etc...)
- A water servicing plan/report be provided detailing the servicing arrangement to and within the property which includes and demonstrates, but is not limited to:
 1. the need for looping/multiple connections to the municipal main (400+ units)
 2. the need for separate water services for separately owned buildings/separately owned entities
 3. the details of land/easement acquisitions to accommodate this servicing to this site or buildings from this site from the municipal water mains
 4. it is a requirement to demonstrate that adequate municipal water servicing to meet both domestic and fire flow requirements is available and to provide modelling detailing both domestic and fire flows

Wastewater

- As part of a future site plan application, the preliminary servicing report prepared by Stantec, dated November 4th, 2014, will need to be updated to reflect the current conditions of the development and drainage area.

Stormwater

- The subject lands are located in the Central Thames Subwatershed. The applicant shall be required to apply the proper SWM practices to ensure that the maximum permissible storm run-off discharge from the subject site will not exceed the peak discharge of storm run-off under pre-development conditions.
- The design and construction of SWM servicing works for the subject land shall be in accordance with:
 - The SWM criteria and targets for the Central Thames Subwatershed,
 - Any as-constructed information and any accepted report or development agreement for the area.
 - The City Design Requirements for on-site SWM controls which may include but not be limited to quantity/quality and erosion controls, and
 - The City's Waste Discharge and Drainage By-Laws; the Ministry of the Environment Planning & Design Manual; as well as all applicable Acts, Policies, Guidelines, Standards and Requirements of all approval agencies.
- The design of the SWM servicing work shall include but not be limited to such aspects as requirements for Oil/Grit separators for the proposed parking area, on-site SWM controls design, possible implementation of SWM Best Management Practices (e.g., Low impact Development "LID" features), grading and drainage design (minor, and major flows), storm drainage conveyance from external areas (including any associated easements), hydrological conditions, etc.
- The applicant and his consultant shall ensure the storm/drainage conveyance from the existing external drainage through the subject lands are preserved, all to the satisfaction of the City Engineer.
- Additional SWM related comments may be required and provided upon future review of this site.

Third Submission Comments

Parks Planning – Received May 25, 2023

Parks Planning and Design staff have reviewed the submitted notice of application and offer the following comments:

- Parkland dedication is required in the form of cash in lieu, pursuant to By-law CP-25 and will be finalized at the time of site plan approval.

Landscaped Architect – Received May 24, 2023

Ecology

Official Plan and Zoning amendments to allow two, 17-storey apartment buildings

This e-mail is to confirm that there are currently no ecological planning issues related to this property and/or associated study requirements.

Major issues identified

- No Natural Heritage Features on, or adjacent to the site have been identified on Map 5 of the London Plan or based on current aerial photo interpretation.

Ecology – complete application requirements

- None.

Notes

- None.

London Hydro – Received May 25, 2023

- Servicing the above proposed should present no foreseeable problems. Any new and/or relocation of existing infrastructure will be at the applicant's expense, maintaining safe clearance from L.H. infrastructure is mandatory. A blanket easement will be required. **Note:** Transformation lead times are minimum 16 weeks. Contact Engineering Dept. to confirm requirements & availability.
- London Hydro has no objection to this proposal or possible official plan and/or zoning amendment. However, London Hydro will require a blanket easement.

Urban Design – Received June 7, 2023

- The site abutting this property to the east (the lands between this property and the future Coronation Drive extension) is contemplated to develop with lower intensity forms such as townhouses. Integrate a reduction in overall building height (for the east tower) and/or an appropriately-sized building setback/step-back from the east property line to ensure the future development on this site is not overshadowed by the proposed building [TLP 298].
- Staff recommend the applicant revisit the proposed massing of the north façade to establish a more human-scale and pedestrian-oriented design along the proposed 'service road':
 - Provide a minimum 5.0m step-back above the 3rd or 4th storey (as opposed to the 6th storey) on the north façade to create a more comfortable environment for pedestrians along this corridor. The step-back should extend along the entirety of the north-facing façade. [TLP 292].
 - Include a highly visible and distinguishable principal building entrance for pedestrians on the north elevation. This entrance should be designed with architectural features such as transparent glazing, weather protection (such as canopies), signage and other architectural features that distinguish it as the principal building entrance. The proposed north elevation includes a highly articulated entrance to the parking garage with minimized pedestrian entrances which promotes a car-oriented design and diminishes the pedestrian-scale design of the building [TLP 291].

- **Matters for Site Plan:**
 - Provide a safe and convenient pedestrian walkway from the public sidewalk on Gainsborough Road and the public sidewalk on the future Coronation Drive extension to the principal building entrance(s) [TLP 268].
 - Consider locating the entrance(s) to the underground parking on the east and/or west elevations of the building as opposed to the north elevation to allow space for a central pedestrian access closer to the public street, to allow for more active uses on the front of the building, and to not have the parking garage entrance be the view terminus for the main access into site [TLP 291].
 - Consider providing individual unit entrances for the ground floor units along the 'service road' and include individual walkway access from each unit to the sidewalk along this street [TLP 286, 291].
 - Consider designing the proposed 'service road' to include pedestrian amenities such as landscaping, street furniture, human-scale lighting and sidewalks on both sides of the street [TLP 255].
 - Rooftop mechanical penthouses and equipment should be screened from view and/or incorporated into the overall building design [TLP 296].
 - Provide easily accessible temporary bicycle parking facilities on-site [TLP 280].
 - Confirm the location(s) of garbage pick-up and/or loading areas and ensure they are screened from view from public streets and/or pedestrian connections [TLP 266].
 - Provide a fully dimensioned site plan and elevations for all sides of the proposed building. Further urban design comments may follow upon receipt of the drawings.

Engineering – Received October 20, 2023

General Servicing:

- The site currently does not have access to municipal storm, sanitary and water services. A General h, h-17, and h-149 holding provisions are recommended to ensure adequate servicing for this site can be demonstrated.
- A consent application will be required to ensure that municipal servicing and easements are provided for 1018 and 1006 Gainsborough Rd. A new holding provision is recommended to ensure that this is completed prior to site plan approval.

Transportation:

- The site is landlocked and currently does not have any access to local roads. A new holding provision is recommended that ensures a suitable access to local road can be obtained by the owner, all to the satisfaction of the City.

Site Plan – Received October 20, 2023

- Site Plan Consultation will be required prior to the submission of a Site Plan application.
- Garbage and recycling are to be stored internal to the building and a pick up point identified on the site plan where bins will be brought out on collection day. This pickup point shall be located and designed to prevent collection vehicles from reversing onto the public street.
- An on-site fire route is required and can be no longer than 90m without a turnaround.
- 429 long-term bicycle parking spaces are required internal to the building, and 48 short-term bicycle parking spaces are required on site.
- The main building entrance shall be oriented to the north.
- Paratransit laybys shall be 3.5mx12m and must be within 15m of a main building entrance. It is noted that the ground floor plan doesn't have side building entrances where the laybys are shown.

Note to planner:

- The applicant calculated the interior side and rear yard setbacks incorrectly – 24m is required for a 58.8m tall building. Provided the by-law specifies yard setbacks in the special provisions without differentiating between tower and podium it should capture them. However, there isn't a front lot line here, so they need a special provision for a north interior side yard setback of 20m. Also recognizing the 0m frontage would clean things up.

Appendix C – Public Engagement

Community Engagement

Notice of Application:

Public liaison: On July 30, 2020, Notice of Application was sent to property owners and residents in the surrounding area. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on July 30, 2020. A “Planning Application” sign was also posted on the site.

Public Responses: Replies were received from 11 households and a petition was submitted.

Nature of Liaison: The purpose and effect of this Zoning change is to permit the development of two, 20 storey residential apartment buildings interconnected by a 4-storey podium with a total of 400 residential units. Possible change to Zoning By-law Z.-1 **FROM** Holding Residential R9 Special Provision (h-5.h-11.h-17. R9-7(17).H50) **TO** Holding Residential R9 Special Provision Bonus (h-5.h-11.h-17. R9-7().H68*B-() Zone; — to permit apartment buildings with special provisions for a minimum front yard setback of 6.2 metres, a minimum west interior side yard setback of 12.0m, a minimum rear side yard setback of 21.1m, a maximum lot coverage of 31.7%, a minimum landscaped open space of 28.3%, and a maximum building height of 67.4m. There is also a request to add a Bonus Zone to permit a maximum density of 308 units per hectare. The City also may consider adding special provisions and/or holding provisions in the zoning to implement the urban design requirements and considerations of the Hyde Park Community Plan.

Revised Notice of Application:

Public liaison: On May 5, 2023 a Revised Notice of Application was sent to property owners and residents in the surrounding area. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on Thursday, May 5, 2023. A “Planning Application” sign was also placed on the site.

Public Responses: Replies were received from 10 households

Nature of Liaison: The purpose and effect of this zoning change is to permit the development of two, 17-storey apartment buildings with 476 residential units and density of 373 units per hectare. Possible change to Zoning By-law Z.-1 **FROM** Holding Residential R9 Special Provision (h-5.h-11.h-17. R9-7(17).H50) **TO** a Holding Residential R9 Special Provision (h-5.h-11.h-17. R9-7().H60 Zone to permit the development of two, 17 storey residential apartment buildings interconnected by a 6-storey podium with a total of 481 residential Special Provisions include: a minimum westerly interior side yard setback of 18.0m whereas 21.2m is required; a minimum rear yard setback of 17.5m whereas 21.2m is required; a maximum building height of 60.0m whereas 50.0m is permitted; a maximum lot coverage of 38% whereas 34% is permitted; and, a maximum density of 287 UPH whereas 150 UPH is permitted.

Responses: A summary of the various comments received include the following:

- Shadow and wind effects
- Light
- Noise
- Increased traffic and pedestrian safety
- Height and density
- Too big for site and numerous changes required
- Access
- Buffering
- Sufficiency of Servicing Infrastructure
- Obstruction of view
- Type of tenancy

- Loss of property value
- Quality of life
- Does not meet the policies of the 'Neighbourhoods Place Type'

Responses to Public Liaison Letter and Publication in "The Londoner"

Good morning Ms. Riley and Mr. Morgan,

I am writing to ask you to decline the planning application for the twin 20 storey towers that are being considered for 978 Gainsborough Road. This massive building is completely unsuitable for the neighbourhood, a view supported by the city since the zoning bylaws prohibit such a behemoth. The proposed building is too tall, and the footprint is too large. In addition, the developer is asking for the maximum unit density to be more than doubled what is allowed. I find this to be completely inappropriate.

I own property in the building south of 978 Gainsborough and I moved to this neighbourhood with the expectation that London's planning policies would hold up against the pressures from developers. I refer to the planning policy which applies to this area-the subject lands are in the "Neighbourhoods" Place Type in the London Plan, permitting a range of housing including single detached, townhouses and low-rise apartments. Londoners must have confidence in the planning process so that when they purchase a home, they know the long-term vision for the neighbourhood.

I want to add that I take exception to one of the developer's comments in their proposal. They say that they "expect" to be given variances since, as they claim, a developer from a nearby property was given them. Where does this end? Will the next developer "expect" to be given all of the amendments that the 978 developers are provided plus anything else that they want? It has to stop. This is not the way that the planning process is meant to work, and it has the potential to destroy our neighbourhood.

I hope that the planners take a good look at the developer's plan for an access road that seems to cross over at least 7 properties. It astounds me that this is even being considered. This is a small piece of property, and, in my view, it is more suited for a residential cluster comprised of single detached or the popular townhouse style that has successfully been incorporated in many areas in this neighbourhood, including immediately to the south-west of 978 Gainsborough.

Finally, I want to comment on the traffic congestion that these towers, and other high-rise buildings, will create. Hyde Park Road is a busy north/south thoroughfare and at times, before Covid-19, it was getting to be almost as congested as Wonderland Road. A building of 308 units/hectare will just add to the problem.

I strongly recommend that you reject the proposal submitted by Highland Communities Ltd. and uphold the zoning bylaws originally created for this area.

Respectfully,

Steve Leckie

Good morning, Alanna

I am reaching out regarding the above proposal.

I am an owner of one of the town homes behind this parcel of land and want to express my concern that 2 buildings of this magnitude should even be in the "ballpark" as being considered for this area.

This land, when I purchased my home, I believe was low to medium density housing, which of course is totally understandable and acceptable when taking into account the size of the land and the surrounding properties,

The potential for 2 buildings 20 storeys high would have a major detrimental impact on the quality of life of the residents, privacy concerns, lack of natural light, noise levels, additional traffic volume, also this area is very "swampy" and waterlogged in wet weather, not my field of expertise, but where will all this excess water go?

1040 Coronation Drive is already becoming lost in amongst high rise buildings, either already built, approved but not yet built and currently under construction.

This is not downtown London; we are a small enclave in a suburb and buildings of this immense mass housing type do not belong or fit with this neighbourhood.

Also, the sign to announce this proposal is in a field on a no through road and cannot be seen by anyone to alert them to this, I myself only caught a glimpse of it whilst out on a walk and could not get close to even read the full details, without having to go onto private property and sinking into a muddy field, not sure why this is considered acceptable to inform the community?

Please re-consider this highly inappropriate proposal, it is just not right to place it here and diminish the feel and look of this neighbourhood to a concrete jungle.

I have cc'd Josh Morgan, so he is aware of the concern felt by his ward.

Thank you for your time.
Ann & Mark Dines

Josh/Alanna:

We are writing to express my concerns and opposition to the Notice of Planning Application by Highland Communities Ltd. in regard to the construction of two 20-storey towers at 978 Gainsborough Road.

We strongly object to this project.

We became owners at _____ in March, 2017 and our quality of life, and that of residents in our building and the surrounding neighbourhood, would be very negatively impacted by this proposed over-sized .

We relied on the zoning that was in place, along with the Council-approved London Plan, and were confident that our view and quality of life would not be severely impacted by future development on adjacent lands. At that time, we were unaware that a developer could so easily convince City Council to override or change zoning (as has recently occurred on a property slightly to the west of 978 Gainsborough Road) to accommodate their ambitious projects which are so unfitting for this residential neighbourhood.

The subject lands at 978 Gainsborough Road are aptly described in the Application Details on page 2 of the Notice of Planning Application as being "in the 'Neighbourhoods' Place Type in the London Plan, permitting a range of housing including single detached, townhouses and low-rise apartments". Homeowners in the area purchased their homes expecting that any new housing within their community would conform to the existing policies then in place. The policies of the Official Plan (London's long-range planning document) allow for density of up to 150 units per hectare; Highland Communities Ltd. is requesting permission for a maximum density of 308 units per hectare – more than double the current permitted density. This proposed density simply does not conform with London's Official Plan – a plan upon which purchasers of homes ought to be able to rely. The applicant is also requesting special zoning provisions "to reduce yard depths, reduce landscaped open space, increase height and increase lot coverage", thereby eating up existing green space by pushing the development unreasonably close to the margins of the lot, and building two new towers reaching far beyond the height of any existing structure in the area. The project in every way is out of step with the "Neighbourhoods' place type" in the Council-approved London Plan and the surrounding neighbourhood as it currently exists - it is far too large a project not only for the lot, but for the neighbourhood in general. Increased traffic in this already-congested area near Gainsborough Rd. and Hyde Park Rd. is an inevitability if Council approves this zoning by-law amendment; a negative impact on the daily lives of current residents, as well as business activity near the intersection, is a certainty.

Increasing traffic congestion and road safety concerns in the Hyde Park/Fanshawe area are something Council is very well aware. This proposed project 978 Gainsborough Road, located

so close to the intersection of Hyde Park Road, will undoubtedly result in problems similar to those experienced at Aldersbrook Gate, as vehicles attempt to exit and enter 978 Gainsborough Road near an already congested intersection. Queues will block driveway entrances to already-existing businesses on Gainsborough Road, and angle collisions are likely as vehicles attempt to make left turns into or out of 978 Gainsborough Road.

It is time Council heeds the concerns of residents in the Hyde Park/Fanshawe area and respects their desire for zoning to remain intact in their neighbourhood, preserving the quality of life they currently enjoy. The London Plan currently permits “a range of housing including single detached, townhouses and low-rise apartments” – this is a Council-approved plan. In no way does Highland Communities Ltd.’s proposed development of two 20-storey towers at 978 Gainsborough Road fit within that Plan. The design and scale of the proposed development are entirely inappropriate for this location. The added traffic congestion that this over-sized, excessively dense residential development will bring to an area already experiencing traffic safety problems (of which Council is well aware) is entirely unacceptable. The requested reduction in yard depths and reduced landscaped open space, along with a significant increase in height and lot coverage, will have a tragic impact on the green, open feel of this residential area – once that is gone, it cannot be recovered.

We ask Council to deny this zoning by-law amendment

Sent from my iPad
Alison/Ivan St. John

Hello Josh and Alanna

I am writing in response to the Notice of Planning Application by Highland Communities Ltd. I received in the mail, regarding the proposed two 20 storey apartment buildings at 978 Gainsborough Rd

This is my **formal objection** to this project, I am an owner at _____, the proposition of this huge project being constructed within steps of our building is disturbing to say the least.

When I purchased and moved into the Hyde Park area it was like living on the outskirts of London with the benefit of city living but much quieter and very enjoyable. The recent neighbourhood construction has been welcomed, but also un-welcomed due to the consistent construction noise, dirt, mud and dust, that the city doesn't seem to keep very well maintained in regard to the roads being washed and swept.

The proposed huge apartment complex is completely outside of what I ever expected to see within Hyde Park, it will not suit any of the related existing buildings or projects under way in the area. It is oversized and unsightly for Hyde Park. Why is land size not considered in construction such as above, the land listed for the development is so small and having two huge apartments in that space would be overwhelming and unsightly. What happened to considering London the Forest City? Why eliminate green space with high rises and concrete?

Hyde Park should not be the epicentre of such a project and the city planning and zoning committees should **seriously re-consider** this project. Please consider **not** permitting this project in our area. It is not welcomed or appreciated.

Sincerely,

Lina Narusevicius

Dear Josh & Alanna:

I am writing to also express my great concerns and opposition to the Notice of Planning Application by Highland Communities Ltd. in regard to the construction of two 20-storey towers at 978 Gainsborough Road.

I strongly object to this project.

I am an owner at _____ and my quality of life, and that of residents in my building and the surrounding neighbourhood, would be very negatively impacted by this proposed oversized project.

The project in every way is out of step with the “Neighbourhoods’ place type” in the Council-approved London Plan and the surrounding neighbourhood as it currently exists - it is far too large a project not only for the lot, but for the neighbourhood in general. Increased traffic in this already-congested area near Gainsborough Rd. and Hyde Park Rd. is an inevitability if Council approves this zoning by-law amendment; a negative impact on the daily lives of current residents, as well as business activity near the intersection, is a certainty.

It is time Council heeds the concerns of residents in the Hyde Park/Fanshawe area and respects their desire for zoning to remain intact in their neighbourhood, preserving the quality of life they currently enjoy. The London Plan currently permits “a range of housing including single detached, townhouses and low-rise apartments” – this is a Council-approved plan. In no way does Highland Communities Ltd.’s proposed development of two 20-storey towers at 978 Gainsborough Road fit within that Plan. The design and scale of the proposed development are entirely inappropriate for this location. The added traffic congestion that this over-sized, excessively dense residential development will bring to an area already experiencing traffic safety problems (of which Council is well aware) is entirely unacceptable. The requested reduction in yard depths and reduced landscaped open space, along with a significant increase in height and lot coverage, will have a tragic impact on the green, open feel of this residential area – once that is gone, it cannot be recovered.

I ask Council to deny this zoning by-law amendment.

Thank you,

Ryan Marcy

Hello Josh and Alanna,

We are in agreement with the concerns expressed by Mary Dowds in her email regarding the massive building project being proposed for 978 Gainsborough Road.

Mary has done the research and has expressed very clearly and concisely the concerns of many of the residence at 1030 Coronation Drive.

We wish to add our concerns to those expressed in her email and expect that London Council will see the major difficulties added to the current traffic problems as well as

the total appropriateness of the size of this proposed project in this neighbourhood.

Thank you for your work on our behalf.

Best Regards,

Jay Campbell

Nancy Claus

Josh and Alanna

I am writing in response to the Notice of Planning Application by Highland Communities Ltd. in regard to the proposed 2 x 20 storey apartment buildings at 978 Gainsborough Road.

I would like to formally file my objection to this project. As an owner at _____, the prospect of this mega-project being constructed within steps of our building is disturbing.

When we purchased and moved my father into this area of the city only a few short years ago, the Hyde Park area possessed a quiet and comfortable atmosphere that he and my (since deceased) mother very much enjoyed. With the exception of another nearby apartment building, the neighbourhood developments have been tasteful and in keeping with the dynamic of the neighbourhood. Even the nearby apartment building is at the very least in keeping with the dimensions of the few other projects in the area.

But this proposed megalith of an apartment complex is completely outside anything we could have anticipated. I do not understand what the purpose of city planning, and zoning is when counsel will override zoning codes so readily. How are property purchasers to plan and understand the neighbourhoods into which they are moving when one cannot rely upon the zoning that is in place?

But this inconsistency aside, these 20 storey buildings cannot be permitted to move ahead. It is completely outsized for the community. The traffic congestion is already difficult for the current residents and as most people in the Hyde Park area rely upon car ownership, this huge project will only add to problems. The zoning application calls for these massive buildings to be placed on a postage stamp space which will further reduce green space and any open feel that remains in the area. We do not want our community to become a metropolis of high rises and concrete.

I ask you to please consider not permitting this project in our area. It is simply not appropriate.

Thank you

John Hauffe

Alanna Riley & Josh Morgan:

Regarding to zoning by-law amendment at the above address I can only agree with a lengthy email already sent to you by John Hauffe. This is not just a complaint by someone with nothing better to do but a real concern about the overall impact this development will have in our area. I have no sympathy for the developers. If they want to build this project then pony up and purchase enough land in the right area to support its size! While the City is attracted to the revenue that would come with this project, they have a duty to the area residents to ensure development does not diminish our lifestyle and incumbent infrastructure.

Yours truly; Richard McDuffe

Alanna:

I am writing to express my concerns and opposition to the Notice of Planning Application by Highland Communities Ltd. in regard to the construction of two 20-storey towers at 978 Gainsborough Road.

I strongly object to this project.

I am an owner at _____ and my quality of life, and that of residents in my building and the surrounding neighbourhood, would be very negatively impacted by this proposed over-sized project. When my husband and I purchased our home, we took into account the zoning of adjacent properties. In making our decision, we relied on the zoning that was in place, along with the Council-approved London Plan, and were confident that our view and quality of life would not be severely impacted by future development on adjacent lands. At that time, we were unaware that a developer could so easily convince City Council to override or change zoning (as has happened recently on a property slightly to the west of 978 Gainsborough Road) to accommodate their ambitious projects which are so unfitting for this residential neighbourhood.

The area around 978 Gainsborough Road is a quiet residential neighbourhood composed mainly of two-storey single-family homes and townhouses. The subject lands at 978 Gainsborough Road are aptly described in the Application Details on page 2 of the Notice of Planning Application as being “***in the ‘Neighbourhoods’ Place Type in the London Plan, permitting a range of housing including single detached, townhouses and low-rise apartments***”. Homeowners in the area purchased their homes expecting that any new housing within their community would remain of this type. Additionally, the policies of the Official Plan (London’s long-range planning document) allow for density of up to 150 units per hectare; Highland Communities Ltd. is requesting permission for a maximum density of 308 units per hectare – ***more than double the current permitted density***. This proposed density simply does not conform with London’s Official Plan – a plan upon which purchasers of homes ought to be able to rely in choosing where to buy. The applicant is also requesting special zoning provisions “to reduce yard depths, reduce landscaped open space, increase height and increase lot coverage”, thereby eating up existing green space by pushing the development unreasonably close to the margins of the lot, and building two new towers reaching far beyond the height of any existing structure in the area. The project in every way is out of step with the “Neighbourhoods’ place type” in the **Council-approved** London Plan and the surrounding neighbourhood as it currently exists - **it is far too large a project not only for the lot, but for the neighbourhood in general**. Increased traffic in this already-congested area near Gainsborough Rd. and Hyde Park Rd. is an inevitability if Council approves this zoning by-law amendment; a negative impact on the daily lives of current residents, as well as business activity near the intersection, is a certainty.

Increasing traffic congestion and road safety concerns in the Hyde Park/Fanshawe area are something Council is very well aware of. Within the past year, a long-overdue traffic light was installed at the corner of South Carriage Way and Hyde Park Road, a mere block from the proposed high-density development at 978 Gainsborough Road. Just this past week, an advanced left-turn signal was installed on Hyde Park at the intersection of Gainsborough Road (a few hundred metres from the entrance to this proposed development), necessitated by the rapidly increasing volume of traffic travelling along Hyde Park Road. For several years now, residents at Aldersbrook Gate (within a mile of this proposed development) have expressed concerns about traffic volume and road safety on their street; a meeting with the Ward Councillor and a traffic assessment took place. Amongst the concerns expressed by residents were: “Angle (T-bone) collisions resulting from vehicles turning on and off of Aldersbrook Gate from Fanshawe Park Road” and “traffic queues on Aldersbrook Gate approaching Fanshawe Park Road result in driveways being blocked”. In response to the concerns, the Transportation staff responded, “by investigating conditions at the site and implementing appropriate mitigation measures”. This proposed project 978 Gainsborough Road, located so close to the intersection of Hyde Park Road, will undoubtedly result in problems similar to those experienced at Aldersbrook Gate, as vehicles attempt to exit and enter 978 Gainsborough Road near an already congested intersection. Queues will block driveway entrances to already-existing businesses on Gainsborough Road, and angle collisions are likely as vehicles attempt to make left turns into or out of 978 Gainsborough Road.

It is time Council heeds the concerns of residents in the Hyde Park/Fanshawe area and respects their desire for zoning to remain intact in their neighbourhood, preserving the

quality of life they currently enjoy. The London Plan currently permits **“a range of housing including single detached, townhouses and low-rise apartments” – this is a Council-approved plan.** In no way does Highland Communities Ltd.’s proposed development of two 20-storey towers at 978 Gainsborough Road fit within that Plan. The design and scale of the proposed development are entirely inappropriate for this location. The added traffic congestion that this over-sized, excessively dense residential development will bring to an area already experiencing traffic safety problems (of which Council is well aware) is entirely unacceptable. The requested reduction in yard depths and reduced landscaped open space, along with a significant increase in height and lot coverage, will have a tragic impact on the green, open feel of this residential area – **once that is gone, it cannot be recovered.**

I ask Council to deny this zoning by-law amendment.

Thank you,
Mary Dowds

Hello Alanna and Josh:

I am writing to express my objection to the File Z-9247 Zoning By-law Amendment requested by Highland Communities Ltd for property situated at 978 Gainsborough Rd.

I live at _____. When I purchased my condo almost 8 years ago, I knew the neighbouring fields I appreciated would eventually be developed. In early 2013 when the initial application for twin 15 story towers for a total of 176 condo units on that property was submitted it was disappointing. It was not the single dwelling or townhouse type residential buildings I was led to expect to be in keeping for the area.

The latest request to accommodate twin 20 story towers for a total of 400 apartments units on that small piece of property far exceeds a 195-unit density that would be acceptable for 1.3 hectare lot based on the Official Plan guidelines for 150 units for hectare. It is not just a small 5 to 10% increase, it is an astonishing 105% increase in units.

They then in turn want to reduce the surrounding yard depths. Considering the increased density (if approved or compromise reached) the yard depths should not be decreased. If anything, one would think the yard depths should be increased if any units over the Official Plan of 150 per hectare is approved.

I believe other homeowners at _____ have already expressed their concern regarding the impact the increased density would have on the traffic volume along Gainsborough leading to an already congested corner at Hyde Park. There are already development plans announced for 1018 Gainsborough and the corner of Hyde Park/Gainsborough that will increase traffic volume along Gainsborough without approving density at 978 Gainsborough that far exceeds the City’s own Official plan.

I would like to again say that I would like the Amendments outlined in File Z-9247 to be denied.

Thank you,

Connie Sanders

To whom it may concern,

I am emailing you today as the Director of Thompson Medical Centre (TMC+) on 990 Gainsborough Road. We have been informed of a proposal to construct a 400-unit residential

building on (978 Gainsborough Rd.). With the current plan, access to this building would be exclusively through our site, causing a large concern for our business operations.

At TMC+, we manage approximately 35-40 physicians who bring in a vast number of patients daily. Therefore, the noise created during construction would be harmful to patients' safety as we conduct medical procedures that require a nearly silent environment.

Our parking lot is regularly at capacity. Thus, patients in need of urgent care would have limited access to our premises due to the busy traffic generated by residents, all of which can only enter and exit through our Gainsborough Road driveway.

With the building having 400-units, we estimate approximately 1,000 extra vehicles using our narrow driveway regularly (400 units x 2 vehicles each + 200 visitors). This heavy traffic would lower our ratings as it would create a hassle for patients, employees, and physicians, harming TMC+'s operation.

Additionally, we are concerned that the parking overflow of the residential building would occupy our parking lot, which would result in turning our patients down and preventing physicians from providing service to their patients.

Our main goal at TMC+ is to serve the community of London and provide health care for those in need. We strongly believe the proposed development behind our center will prevent us from achieving that goal.

Hence, on behalf of our physicians, medical tenants including a blood laboratory and pharmacy, and our 50,000+ patients, we request a halt to this proposed development.

We hope that this request will be accommodated, however, in the case that this request is denied, we will retain specialized legal counsel.

Sincerely,

Chantelle Wragg

I am writing to express my concerns and opposition to the Notice of Planning Application by Highland Communities Ltd. in regard to the construction of two 20-storey towers at 978 Gainsborough Road.

I strongly object to this project.

I am an owner at _____ and my quality of life, and that of residents in my building and the surrounding neighbourhood, would be very negatively impacted by this proposed over-sized project. When my husband and I purchased our home, we took into account the zoning of adjacent properties. In making our decision, we relied on the zoning that was in place, along with the Council-approved London Plan, and were confident that our view and quality of life would not be severely impacted by future development on adjacent lands. At that time, we were unaware that a developer could so easily convince City Council to override or change zoning (as has happened recently on a property slightly to the west of 978 Gainsborough Road) to accommodate their ambitious projects which are so unfitting for this residential neighbourhood.

The area around 978 Gainsborough Road is a quiet residential neighbourhood composed mainly of two-storey single-family homes and townhouses. The subject lands at 978 Gainsborough Road are aptly described in the Application Details on page 2 of the Notice of Planning Application as being "in the 'Neighbourhoods' Place Type in the London

Plan, permitting a range of housing including single detached, townhouses and low-rise apartments". Homeowners in the area purchased their homes expecting that any new housing within their community would remain of this type. Additionally, the policies of the Official Plan (London's long-range planning document) allow for density of up to 150 units per hectare; Highland Communities Ltd. is requesting permission for a maximum density of 308 units per hectare – more than double the current permitted density. This proposed density simply does not conform with London's Official Plan – a plan upon which purchasers of homes ought to be able to rely in choosing where to buy. The applicant is also requesting special zoning provisions "to reduce yard depths, reduce landscaped open space, increase height and increase lot coverage", thereby eating up existing green space by pushing the development unreasonably close to the margins of the lot, and building two new towers reaching far beyond the height of any existing structure in the area. The project in every way is out of step with the "Neighbourhoods' place type" in the Council-approved London Plan and the surrounding neighbourhood as it currently exists - it is far too large a project not only for the lot, but for the neighbourhood in general. Increased traffic in this already-congested area near Gainsborough Rd. and Hyde Park Rd. is an inevitability if Council approves this zoning by-law amendment; a negative impact on the daily lives of current residents, as well as business activity near the intersection, is a certainty.

Increasing traffic congestion and road safety concerns in the Hyde Park/Fanshawe area are something Council is very well aware of. Within the past year, a long-overdue traffic light was installed at the corner of South Carriage Way and Hyde Park Road, a mere block from the proposed high-density development at 978 Gainsborough Road. Just this past week, an advanced left-turn signal was installed on Hyde Park at the intersection of Gainsborough Road (a few hundred metres from the entrance to this proposed development), necessitated by the rapidly increasing volume of traffic travelling along Hyde Park Road. For several years now, residents at Aldersbrook Gate (within a mile of this proposed development) have expressed concerns about traffic volume and road safety on their street; a meeting with the Ward Councillor and a traffic assessment took place. Amongst the concerns expressed by residents were: "Angle (T-bone) collisions resulting from vehicles turning on and off of Aldersbrook Gate from Fanshawe Park Road" and "traffic queues on Aldersbrook Gate approaching Fanshawe Park Road result in driveways being blocked". In response to the concerns, the Transportation staff responded, "by investigating conditions at the site and implementing appropriate mitigation measures". This proposed project 978 Gainsborough Road, located so close to the intersection of Hyde Park Road, will undoubtedly result in problems similar to those experienced at Aldersbrook Gate, as vehicles attempt to exit and enter 978 Gainsborough Road near an already congested intersection. Queues will block driveway entrances to already-existing businesses on Gainsborough Road, and angle collisions are likely as vehicles attempt to make left turns into or out of 978 Gainsborough Road.

It is time Council heeds the concerns of residents in the Hyde Park/Fanshawe area and respects their desire for zoning to remain intact in their neighbourhood, preserving the quality of life they currently enjoy. The London Plan currently permits "a range of housing including single detached, townhouses and low-rise apartments" – this is a Council-approved plan. In no way does Highland Communities Ltd.'s proposed development of two 20-storey towers at 978 Gainsborough Road fit within that Plan. The design and scale of the proposed development are entirely inappropriate for this location. The added traffic congestion that this over-sized, excessively dense residential development will bring to an area already experiencing traffic safety problems (of which Council is well aware) is entirely unacceptable. The requested reduction in yard depths and reduced landscaped open space, along with a significant increase in height and lot coverage, will have a tragic impact on the green, open feel of this residential area – once that is gone, it cannot be recovered.

I ask Council to deny this zoning by-law amendment.

Thank you,

Anita Sorensen

Josh/Alanna:

I am writing to express my concerns and opposition to the Notice of Planning Application by Highland Communities Ltd. in regard to the construction of two 20-storey towers at 978 Gainsborough Road.

I strongly object to this project.

I am an owner at _____ and my quality of life, and that of residents in my building and the surrounding neighbourhood, would be very negatively impacted by this proposed over-sized project. When my husband and I purchased our home, we took into account the zoning of adjacent properties. In making our decision, we relied on the zoning that was in place, along with the Council-approved London Plan, and were confident that our view and quality of life would not be severely impacted by future development on adjacent lands. At that time, we were unaware that a developer could so easily convince City Council to override or change zoning (as has happened recently on a property slightly to the west of 978 Gainsborough Road) to accommodate their ambitious projects which are so unfitting for this residential neighbourhood.

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permitting a range of housing including single detached, townhouses and low-rise apartments". Homeowners in the area purchased their homes expecting that any new housing within their community would remain of this type. Additionally, the policies of the Official Plan (London's long-range planning document) allow for density of up to 150 units per hectare; Highland Communities Ltd. is requesting permission for a maximum density of 308 units per hectare – more than double the current permitted density. This proposed density simply does not conform with London's Official Plan – a plan upon which purchasers of homes ought to be able to rely in choosing where to buy. The applicant is also requesting special zoning provisions "to reduce yard depths, reduce landscaped open space, increase height and increase lot coverage", thereby eating up existing green space by pushing the development unreasonably close to the margins of the lot, and building two new towers reaching far beyond the height of any existing structure in the area. The project in every way is out of step with the "Neighbourhoods' place type" in the Council-approved London Plan and the surrounding neighbourhood as it currently exists - it is far too large a project not only for the lot, but for the neighbourhood in general. Increased traffic in this already-congested area near Gainsborough Rd. and Hyde Park Rd. is an inevitability if Council approves this zoning by-law amendment; a negative impact on the daily lives of current residents, as well as business activity near the intersection, is a certainty.

Increasing traffic congestion and road safety concerns in the Hyde Park/Fanshawe area are something Council is very well aware of. Within the past year, a long-overdue traffic light was installed at the corner of South Carriage Way and Hyde Park Road, a mere block from the proposed high-density development at 978 Gainsborough Road. Just this past week, an advanced left-turn signal was installed on Hyde Park at the intersection of Gainsborough Road (a few hundred metres from the entrance to this proposed development), necessitated by the rapidly increasing volume of traffic travelling along Hyde Park Road. For several years now, residents at Aldersbrook Gate (within a mile of this proposed development) have expressed concerns about traffic volume and road safety on their street; a meeting with the Ward Councillor and a traffic assessment took place. Amongst the concerns expressed by residents were: "Angle (T-bone) collisions resulting from vehicles turning on and off of Aldersbrook Gate from Fanshawe Park Road" and "traffic queues on Aldersbrook Gate approaching Fanshawe Park Road result in driveways being blocked". In response to the concerns, the Transportation staff responded, "by investigating conditions at the site and implementing appropriate mitigation measures". This proposed project 978 Gainsborough Road, located so close to the intersection of Hyde Park Road, will undoubtedly result in problems similar to those experienced at Aldersbrook Gate, as vehicles attempt to exit and enter 978 Gainsborough Road near an already congested intersection. Queues will block driveway entrances to already-existing businesses on Gainsborough Road, and angle collisions are likely as vehicles attempt to make left turns into or out of 978 Gainsborough Road.

It is time Council heeds the concerns of residents in the Hyde Park/Fanshawe area and respects their desire for zoning to remain intact in their neighbourhood, preserving the quality of life they currently enjoy. The London Plan currently permits "a range of housing including single detached, townhouses and low-rise apartments" – this is a Council-approved plan. In no way does Highland Communities Ltd.'s proposed development of two 20-storey towers at 978 Gainsborough Road fit within that Plan. The design and scale of the proposed development are entirely inappropriate for this location. The added traffic congestion that this over-sized, excessively dense residential development will bring to an area already experiencing traffic safety problems (of which Council is well aware) is entirely unacceptable. The requested reduction in yard depths and reduced landscaped open space, along with a significant increase in height and lot coverage, will have a tragic impact on the green, open feel of this residential area – once that is gone, it cannot be recovered.

On a personal note, living on the ground floor facing north, my view of the sky will be completely cut off by this mega complex.

I ask Council to deny this zoning by-law amendment.

Thank you,

Maureen and Gary Norwood

Good morning, Alanna

We have received the notice of planning application for 978 Gainsborough Road here in London.

There are obviously many concerns with a proposal this size going into a smaller neighbourhood, mainly the increase amount of traffic this will bring in.

It feels as though the developer is trying to fit this massive project into a small area and has no concern for the residents they are impacting.

We built here three years ago and were told that behind us was zoned for a single family home dwelling or the potential of more condos. Which was understandable considering the space. There was never talk of 2 20-story high rise 400-unit buildings, which is unfortunate as a lot of residents are extremely let down and disappointed in the city's decision to even accept this type of proposal.

I know this note may not go very far, and who knows I may be the only person who took the time to speak up, but I feel compelled to say something on such a disruption.

I hope the city reconsiders this application, or at best takes a drive out to the proposed site to see the number of trees, farm land, and green space that will be gone should this high rise complex go up.

Thank you

Rachel Rabi

We are writing this in response to the above-mentioned company in regards to the proposed two 20 storey apartment buildings at 978 Gainsborough Road.

We are formally filing our objections to this project.

We are both extremely disturbed by the proposals of this mega project at our doorstep at _____.

We moved to London— "Hyde Park Village " from the country 7 years ago. It was the most appealing area in the city to us with a family community atmosphere.

A few other apartment buildings that are being constructed in the neighbourhood are acceptable for progress BUT High-Rise Apartments of this magnitude would forever change "Hyde Park" and this lovely neighbourhood completely.

These two 20 storey buildings should not be allowed to be built here in Hyde Park. Not only because of adding to our already heavy traffic congestion but these massive buildings do nothing to enhance this area of our beautiful Forest City and our family oriented community.

Please Do Not Permit these buildings to be constructed here in Hyde Park Village!!

Thank you for listening and respecting our community.

Sincerely

Bob & Marion Brady

Josh/Alana: I am writing this email about my concerns for building such a high-density apartment building at 978 Gainsborough Rd. I strongly disagree with this project of 2 - 20 story building begin built just outside of my building at _____. When I moved here to this area, I did not expect worries about a building of such a enormous height within this community. The problems with traffic and road safety are my main concern. Other issues are over zoning in a small area and taking away more green space. I ask Council to deny this zoning by law amendment. Thank you, Janina Cowan, owner at _____.

Dear Josh & Alanna:

We are writing to express our concerns and opposition to the Notice of Planning Application by Highland Communities Ltd. in regard to the construction of two 20-storey towers at 978 Gainsborough Road.

We strongly object to this project!

We are owners at _____ and our quality of life, and that of all residents in our building and the surrounding neighbourhood would be very negatively impacted by this proposed over-sized project. When we purchased our home in 2019, we took into account the zoning of adjacent properties at that time. In making our decision, we relied on the zoning that was in place, along with the Council-approved London Plan, and were confident that our view looking north, and quality of life would not be severely impacted by future development on adjacent lands. At that time, we were **totally unaware** that a developer could so easily convince City Council to override or change zoning (as has happened recently on a property slightly to the west of 978 Gainsborough Road) to accommodate their ambitious projects which are so unfitting for this residential neighbourhood. We feel totally blindsided by this proposal. Our investment into our lovely condo will be drastically affected negatively, with no thoughts or regards to us, the current residents living in this beautiful neighbourhood, let alone the congestion of traffic in this area at Hyde Park & Gainsborough.

Green space in our city is disappearing at record levels, and I am surprised a city the size of London would allow this to happen. Our city is known for its green areas and to our knowledge, is still known as the Forest City. Our voices need to be heard to save this beautiful green area deemed for destruction and the erection of two 20 story buildings. This very small green space at 978 Gainsborough was home for many species of ducks, geese, birds and wildlife of all kinds. It was pleasant to sit on our balcony and watch or listen to their busy lives in this green space. Now, as it appears, we will get to look at the monstrosity of two oversized 20 story buildings. encroaching every inch of green space, we had. Our scenic view will be gone as we look at cars, trucks etc. coming and going in place of nature at it's best.

Has there been any thought given to the safety of the children who live in this neighbourhood? Adding the number of vehicles to this residential area by erecting two 20 story buildings, will put the safety of our children playing in this neighbourhood at high risk. Having a school within the boundaries of this proposed development, has certainly attracted more families with children to this community. We are extremely concerned for their safety with the increased number of vehicles coming and going throughout this neighbourhood should this development proposed go forward.

The area around 978 Gainsborough Road is a quiet residential neighbourhood composed mainly of two-storey single-family homes and townhouses. The subject lands at 978 Gainsborough Road are aptly described in the Application Details on page 2 of the Notice of Planning Application as being "in the 'Neighbourhoods' Place Type in the London Plan, permitting a range of housing including single detached, townhouses and low-rise apartments". Homeowners in the area purchased their homes expecting that any new housing within their community would remain of this type. Additionally, the policies of the Official Plan (London's long-range planning document) allow for density of up to 150 units per hectare; Highland Communities Ltd. is requesting permission for a maximum density of 308 units per hectare – more than double the current permitted density. This proposed density simply does not conform with London's Official Plan – a plan upon which purchasers of homes ought to be able to rely in choosing where to buy. The applicant is also requesting special zoning provisions "to reduce yard depths, reduce landscaped open space, increase height and increase lot coverage", thereby eating up existing green space by pushing the development unreasonably close to the margins of the lot, and building two new towers reaching far beyond the height of any existing structure in the area. The project in every way is out of step with the "Neighbourhoods' place type" in the Council-approved London Plan and the surrounding neighbourhood as it currently exists - it is far too large a project not only for the lot, but for the neighbourhood in general. Increased traffic in this already-congested area near Gainsborough Rd. and Hyde Park Rd. is an inevitability if Council approves this zoning by-law amendment; a negative impact on the daily lives of current residents, as well as business activity near the intersection, is a certainty.

Increasing traffic congestion and road safety concerns in the Hyde Park/Fanshawe area are something Council is very well aware of. Within the past year, a long-overdue traffic light was installed at the corner of South Carriage Way and Hyde Park Road, a mere block from the proposed high-density development at 978 Gainsborough Road. Just this past week, an advanced left-turn signal was installed on Hyde Park at the intersection of Gainsborough Road (a few hundred metres from the entrance to this proposed development), necessitated by the rapidly increasing volume of traffic travelling along Hyde Park Road. For several years now, residents at Aldersbrook Gate (within a mile of this proposed development) have expressed concerns about traffic volume and road safety on their street; a meeting with the Ward Councillor and a traffic assessment took place. Amongst the concerns expressed by residents were: “Angle (T-bone) collisions resulting from vehicles turning on and off of Aldersbrook Gate from Fanshawe Park Road” and “traffic queues on Aldersbrook Gate approaching Fanshawe Park Road result in driveways being blocked”. In response to the concerns, the Transportation staff responded, “by investigating conditions at the site and implementing appropriate mitigation measures”. This proposed project 978 Gainsborough Road, located so close to the intersection of Hyde Park Road, will undoubtedly result in problems similar to those experienced at Aldersbrook Gate, as vehicles attempt to exit and enter 978 Gainsborough Road near an already congested intersection. Queues will block driveway entrances to already-existing businesses on Gainsborough Road, and angle collisions are likely as vehicles attempt to make left turns into or out of 978 Gainsborough Road.

It is time Council heeds the concerns of residents in the Hyde Park/Fanshawe area and respects their desire for zoning to remain intact in their neighbourhood, preserving the quality of life they currently enjoy. The London Plan currently permits “a range of housing including single detached, townhouses and low-rise apartments” – this is a Council-approved plan. In no way does Highland Communities Ltd.’s proposed development of two 20-storey towers at 978 Gainsborough Road fit within that Plan. The design and scale of the proposed development are entirely inappropriate for this location. The added traffic congestion that this over-sized, excessively dense residential development will bring to an area already experiencing traffic safety problems (of which Council is well aware) is entirely unacceptable. The requested reduction in yard depths and reduced landscaped open space, along with a significant increase in height and lot coverage, will have a tragic impact on the green, open feel of this residential area – once that is gone, it cannot be recovered.

We ask Council adamantly, to deny this zoning by-law amendment on behalf of all residents who live in this neighbourhood by listening to all residents who do have a voice and an investment in this community. Let this green space live on and the wildlife it houses.

Thanking you in advance for your consideration and attention to the important matter at hand.

Gillian & Keith Brant

Josh/Alanna:

I am writing to express my concerns and opposition to the Notice of Planning Application by Highland Communities Ltd. in regard to the construction of two 20-storey towers at 978 Gainsborough Road.

I strongly object to this project.

I am an owner at _____ and my quality of life, and that of residents in my building and the surrounding neighbourhood, would be very negatively impacted by this proposed over-sized project.

When we purchased our home at Northcliff, in the fall of 2011, we chose this location, in part, because of its tranquility. In the past 7 years, of those nine years, there has been nothing but new construction around us in every direction. The Johnson 3 story homes to the west, a medical centre to the north, a housing project to the east and now a new 6 story apartment building has begun. To the south of us, there has been a massive housing development (which is continuing) and a new elementary school, as well as a 12-storey apartment building from Drewlo. There remains a junkyard of sorts on this property to the south as Drewlo is planning another high rise next to its first phase. Drewlo should be ashamed of the unsightly construction site, leaving all this rusted equipment and debris and the city does nothing about this?

This constant construction, the to and for of large machinery and trucks with equipment at every turn, is very demoralizing, depressing and nerve-wracking since it is hard to retrieve the peace, quiet and safety we once enjoyed. One cannot relax on their balcony from the sounds and sights of constant construction. If this new mega project goes ahead, I believe nerves will be frayed even further and we will be living in a concrete jungle. Had I been looking to live in that environment I would have bought a condo in downtown London.

In this time of Covid, isolation and uncertainty, for the city to approve such a proposal, would most likely add another dimension of stress and worry to the psyche of your Hyde Park residents. This decision could be seen as very irresponsible, as it would surely add a burden to the mental health of all residents.

I implore Council to deny this zoning by-law amendment. Thank you.

Carole Gregoire
Northcliff Resident

Good Morning, Josh

Good morning, Alana

I hope this email finds you both in good health and spirits.

I am writing to express my concern and strong opposition to the proposed zoning change Application by Highland Communities Ltd. in regard to the construction of two 20-story towers at 978 Gainsborough Road.

I strongly oppose this project.

I am an owner at _____ and my quality of life, and that of residents in my building and the surrounding neighbourhood, would be very negatively impacted by this proposed over-sized project. When my wife and I purchased our home, we took into account the zoning of adjacent properties. In making our decision, we relied on the zoning that was in place, along with the Council-approved London Plan, and were confident that our view and quality of life would not be severely impacted by future development on adjacent lands. At that time, we were aware of a plan to build 2 -15 story condominium apartments on the empty lot at 978 Gainsborough Road. We were not happy about this project but accepted it because it was within the limits set by the City of London zoning density limits. This proposed monstrosity not only exceeds the building setback requirements in place on all three sides, but it also more than doubles the allowed density of 150 units per hectore. Since we purchased our home in 2015, we have had a major apartment building completed on the south side of our property, with a twin to this building already started. Construction has started on an apartment building immediately to our east. Another 15-story building is planned for the property just to the north of 1040 Coronation and a huge complex is planned for the corner of Gainsborough and Hyde Park. I understand the need for development in a city, but taking all these projects into consideration, there is sufficient intensification happening in this small neighbourhood without allowing this mega project to proceed on such a small footprint. We moved to the Forest City from Hamilton when we retired. We enjoy all the green spaces and trails London is so proud of. If I had wanted to live in a concrete jungle, I would have moved to Toronto. There needs to be balance in any city development plan, and we are reaching a tipping point with the projects already planned for this neighbourhood. If this project gets approved, any hope of regaining this balance is lost.

I strongly request Council deny this zoning by-law amendment.

Thank you, and have a great day,

Roland & Cheryl Katzer

I am writing to voice my concern and opposition to the proposed development and changes to the zoning by-law.

This proposed development seems very out of step with the approved London Plan. It seems out of step on what experts recommend. London Official plan was established to protect the citizen from this type of project. How could council allow special zoning by laws that reduce yard depths, reduce landscaped areas and increase heights of buildings and more than double the density of population in this residential neighbourhood? The property is much too small for the size of the proposed buildings. Our

infrastructure can not handle this increase, people did not buy in this neighbourhood to live in this proposed environment. Property values will fall in the surrounding area and quality of life will suffer. Much of the areas wet land area has been filled and built on which has caused significant ground water issues. This patch of land gets much of the runoff from surrounding properties and where will that water go?

I urge council to protect the current people who live in the area and not allow this type of mammoth project ruin this area.

Sincerely

Douglas Kennedy

I am writing to express my concern and opposition to the Notice of Planning Application by Highland Communities Ltd. in regard to the construction of two 20-storey towers at 978 Gainsborough Road. As a resident of _____ I strongly object to this project. I feel my quality of life as well as all residents in my building and the surrounding neighbourhood would be very negatively impacted by this project. I ask Council to deny this zoning by-law amendment.

Thank you,
Lois Hyde

Josh/Alanna:

I am writing to express my concerns and opposition to the Notice of Planning Application by Highland Communities Ltd. in regard to the construction of two 20-storey towers at 978 Gainsborough Road.

I strongly object to this project.

I am an owner at _____ and my quality of life, and that of residents in my building and the surrounding neighbourhood, would be very negatively impacted by this proposed over-sized project. When my husband and I purchased our home, we took into account the zoning of adjacent properties. In making our decision, we relied on the zoning that was in place, along with the Council-approved London Plan, and were confident that our view and quality of life would not be severely impacted by future development on adjacent lands. At that time, we were unaware that a developer could so easily convince City Council to override or change zoning (as has happened recently on a property slightly to the west of 978 Gainsborough Road) to accommodate their ambitious projects which are so unfitting for this residential neighbourhood.

The area around 978 Gainsborough Road is a quiet residential neighbourhood composed mainly of two-storey single-family homes and townhouses. The subject lands at 978 Gainsborough Road are aptly described in the Application Details on page 2 of the Notice of Planning Application as being "in the 'Neighbourhoods' Place Type in the London Plan, permitting a range of housing including single detached, townhouses and low-rise apartments". Homeowners in the area purchased their homes expecting that any new housing within their community would remain of this type. Additionally, the policies of the Official Plan (London's long-range planning document) allow for density of up to 150 units per hectare; Highland Communities Ltd. is requesting permission for a maximum density of 308 units per hectare – more than double the current permitted density. This proposed density simply does not conform with London's Official Plan – a plan upon which purchasers of homes ought to be able to rely in choosing where to buy. The applicant is also requesting special zoning provisions "to reduce yard depths, reduce landscaped open space, increase height and increase lot coverage", thereby eating up existing green space by pushing the development unreasonably close to the margins of the lot, and building two new towers reaching far beyond the height of any existing structure in the area. The project in every

way is out of step with the "Neighbourhoods' place type" in the Council-approved London Plan and the surrounding neighbourhood as it currently exists - it is far too large a project not only for the lot, but for the neighbourhood in general. Increased traffic in this already-congested area near Gainsborough Rd. and Hyde Park Rd. is an inevitability if Council approves this zoning by-law amendment; a negative impact on the daily lives of current residents, as well as business activity near the intersection, is a certainty.

Increasing traffic congestion and road safety concerns in the Hyde Park/Fanshawe area are something Council is very well aware of. Within the past year, a long-overdue traffic light was installed at the corner of South Carriage Way and Hyde Park Road, a mere block from the proposed high-density development at 978 Gainsborough Road. Just this past week, an advanced left-turn signal was installed on Hyde Park at the intersection of Gainsborough Road (a few hundred metres from the entrance to this proposed development), necessitated by the rapidly increasing volume of traffic travelling along Hyde Park Road. For several years now, residents at Aldersbrook Gate (within a mile of this proposed development) have expressed concerns about traffic volume and road safety on their street; a meeting with the Ward Councillor and a traffic assessment took place. Amongst the concerns expressed by residents were: "Angle (T-bone) collisions resulting from vehicles turning on and off of Aldersbrook Gate from Fanshawe Park Road" and "traffic queues on Aldersbrook Gate approaching Fanshawe Park Road result in driveways being blocked". In response to the concerns, the Transportation staff responded, "by investigating conditions at the site and implementing appropriate mitigation measures". This proposed project 978 Gainsborough Road, located so close to the intersection of Hyde Park Road, will undoubtedly result in problems similar to those experienced at Aldersbrook Gate, as vehicles attempt to exit and enter 978 Gainsborough Road near an already congested intersection. Queues will block driveway entrances to already existing businesses on Gainsborough Road, and angle collisions are likely as vehicles attempt to make left turns into or out of 978 Gainsborough Road.

It is time Council heeds the concerns of residents in the Hyde Park/Fanshawe area and respects their desire for zoning to remain intact in their neighbourhood, preserving the quality of life they currently enjoy. The London Plan currently permits "a range of housing including single detached, townhouses and low-rise apartments" – this is a Council-approved plan. In no way does Highland Communities Ltd.'s proposed development of two 20-storey towers at 978 Gainsborough Road fit within that Plan. The design and scale of the proposed development are entirely inappropriate for this location. The added traffic congestion that this over-sized, excessively dense residential development will bring to an area already experiencing traffic safety problems (of which Council is well aware) is entirely unacceptable. The requested reduction in yard depths and reduced landscaped open space, along with a significant increase in height and lot coverage, will have a tragic impact on the green, open feel of this residential area – once that is gone, it cannot be recovered.

I ask Council to deny this zoning by-law amendment.

Thank you

Parvin Basharat

I am contacting you to voice my formal opinion regarding the zoning amendment put forth by Highland Communities Ltd for 978 Gainsborough Road. This amendment requests rezoning for two 20-storey residential apartment buildings comprising of 400 residential units.

I was unhappy to find out there was going to be one 12 storey residential building to start with as I am a resident of _____ with a unit facing north which will be looking directly into the windows of this new building.

I am a senior and I purchased my unit because of the quiet setting, the view and elder population in my building, this monstrosity of a building will change all that for me in what was to be my final home in this lifetime.

Most people in my building rely on their cars to get around and the traffic congestion a 400-unit complex would cause is beyond thinking about as well. Traffic here is a problem as it is now.

Thank you for understanding that living in a concrete jungle was not my intention when I purchased my home here.

Norma Trevelyan

Hello,

I received a notice of a zoning by-law amendment for the above-named property. I am deeply concerned with this proposed development as it appears to request a large number of amendments, all of which negatively impact the surroundings with no positive trade offs. The buildings will be in direct view of our current residence and the amendments all directly impact our building negatively. I wish council will consider existing residents and voters when reviewing this amendment request. Historically amendment protests have been brushed off with one-sentence responses which cannot keep happening! I am all for the area to be developed but following the existing by-law and zoning requirements!

This latest proposed development is seeking to amend the permitted use for all the following areas:

- Increased building height
- reduced yard depth
- reduced landscaping
- increased lot coverage
- increased density
- reduced setbacks

All these amendments will negatively impact the area with no offer of benefit. Where's the trade offs here for accepting these amendments beside developer profits? And why should they be permitted to reduce landscaping, increase height, density, and reduce setbacks? I am deeply concerned with this proposed development.

Again, I am for development in the area however please ensure they follow the by-laws which have been established for a reason. An amendment is meant to address site specific constraints, not to allow developers to skip by-laws. Meet the setbacks from our property and provide the landscaping required. Also adhere to the maximum building heights! The open space and landscaping are of paramount importance to keep with the City's goals of becoming an environmentally friendly City, reducing parking spots and storm water run-off. This amendment request does the opposite. There is no benefit to the City or the residence for accepting these amendments.

I'm strongly opposed to these by-law amendments but do welcome the land being developed in accordance with the existing by-laws.

Mo

I own a condo at _____. A 2 - 20 storey apartment building at 978 Gainsborough Rd. Will kill the beauty of the area.
20 STOREY IS STUPID. AND LOWER OUR PROPERTY VALUE

Josh:

I am writing to express my concerns and opposition to the Notice of Planning Application by Highland Communities Ltd. in regard to the construction of two 20-storey towers at 978 Gainsborough Road.

I strongly object to this project.

I am an owner at _____ and my quality of life, and that of residents in my building and the surrounding neighbourhood, would be very negatively impacted by this proposed oversized project. When my husband and I purchased our home, we took into account the zoning of adjacent properties. In making our decision, we relied on the zoning that was in place, along with the Council-approved London Plan, and were confident that our view and quality of life would not be severely impacted by future development on adjacent lands. At that time, we were unaware that a developer could so easily convince City Council to override or change zoning (as has happened recently on a property slightly to the west of 978 Gainsborough Road) to accommodate their ambitious projects which are so unfitting for this residential neighbourhood.

The area around 978 Gainsborough Road is a quiet residential neighbourhood composed mainly of two-storey single-family homes and townhouses. The subject lands at 978 Gainsborough Road are aptly described in the Application Details on page 2 of the Notice of Planning Application as being ***“in the ‘Neighbourhoods’ Place Type in the London Plan, permitting a range of housing including single detached, townhouses and low-rise apartments”***. Homeowners in the area purchased their homes expecting that any new housing within their community would remain of this type. Additionally, the policies of the Official Plan (London’s long-range planning document) allow for density of up to 150 units per hectare; Highland Communities Ltd. is requesting permission for a maximum density of 308 units per hectare – ***more than double the current permitted density***. This proposed density simply does not conform with London’s Official Plan – a plan upon which purchasers of homes ought to be able to rely in choosing where to buy. The applicant is also requesting special zoning provisions “to reduce yard depths, reduce landscaped open space, increase height and increase lot coverage”, thereby eating up existing green space by pushing the development unreasonably close to the margins of the lot, and building two new towers reaching far beyond the height of any existing structure in the area. The project in every way is out of step with the “Neighbourhoods’ place type” in the **Council-approved** London Plan and the surrounding neighbourhood as it currently exists - **it is far too large a project not only for the lot, but for the neighbourhood in general**. Increased traffic in this already-congested area near Gainsborough Rd. and Hyde Park Rd. is an inevitability if Council approves this zoning by-law amendment; a negative impact on the daily lives of current residents, as well as business activity near the intersection, is a certainty.

Increasing traffic congestion and road safety concerns in the Hyde Park/Fanshawe area are something Council is very well aware of. Within the past year, a long-overdue traffic light was installed at the corner of South Carriage Way and Hyde Park Road, a mere block from the proposed high-density development at 978 Gainsborough Road. Just this past week, an advanced left-turn signal was installed on Hyde Park at the intersection of Gainsborough Road (a few hundred metres from the entrance to this proposed development), necessitated by the rapidly increasing volume of traffic travelling along Hyde Park Road. For several years now, residents at Aldersbrook Gate (within a mile of this proposed development) have expressed concerns about traffic volume and road safety on their street; a meeting with the Ward Councillor and a traffic assessment took place. Amongst the concerns expressed by residents were: “Angle (T-bone) collisions resulting from vehicles turning on and off of Aldersbrook Gate from Fanshawe Park Road” and “traffic queues on Aldersbrook Gate approaching Fanshawe Park Road result in driveways being blocked”. In response to the concerns, the Transportation staff responded, “by investigating conditions at the site and implementing appropriate mitigation measures”. This proposed project 978 Gainsborough Road, located so close to the intersection of Hyde Park Road, will undoubtedly result in problems similar to those experienced at Aldersbrook Gate, as vehicles attempt to exit and enter 978 Gainsborough Road near an already congested intersection. Queues will block driveway entrances to already

existing businesses on Gainsborough Road, and angle collisions are likely as vehicles attempt to make left turns into or out of 978 Gainsborough Road.

It is time Council heeds the concerns of residents in the Hyde Park/Fanshawe area and respects their desire for zoning to remain intact in their neighbourhood, preserving the quality of life they currently enjoy. The London Plan currently permits **“a range of housing including single detached, townhouses and low-rise apartments” – this is a Council-approved plan**. In no way does Highland Communities Ltd.’s proposed development of two 20-storey towers at 978 Gainsborough Road fit within that Plan. The design and scale of the proposed development are entirely inappropriate for this location. The added traffic congestion that this over-sized, excessively dense residential development will bring to an area already experiencing traffic safety problems (of which Council is well aware) is entirely unacceptable. The requested reduction in yard depths and reduced landscaped open space, along with a significant increase in height and lot coverage, will have a tragic impact on the green, open feel of this residential area – **once that is gone, it cannot be recovered**.

I ask Council to deny this zoning by-law amendment.

Thank you,
Mary Dowds

Good morning, Josh,

Regarding the above proposed action.
Margaret and I are totally against this project in a mainly residential area.

This is a project that would fit with the London downtown area.

You can see even now if you need to fiddle with by-laws to "make it fit, or force it to fit", this should be an indication that it doesn't belong.

Please address this to city Hall that this project is out of place in Hyde Park. The "shoe" doesn't fit.

Thanks, Margaret and Henry Kling


MENEAR WORRAD
& ASSOCIATES

August 19, 2020

Sent Via Email – ariley@london.ca

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Real Estate/Corporate

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Attention: Alanna Riley

Dear Ms. Riley:

**RE: 978 Gainsborough Rd., London
Your File No Z-9247**

Michael A. Menear

Brian K. Worrad

Daniel J. McNamara

Karen E. MacDonald

Michael H. Murray

Mary F. Portis
RETIRED

William R. Poole Q.C.
COUNSEL TO THE FIRM
(1990-2010)

Please be advise that I am legal counsel for MIT-Medical Investment Team Inc., the owner of the of the property municipally known as 990 Gainsborough Rd., London. My client was provided with a copy of the Notice of Planning Application document sent out to the public by you on July 30, 2020.

The proposed rezoning causes a number of concerns for our client. Firstly, the proposed zoning increases the number of units on the subject property by approximately 224 units. The Applicant's were provided a Right of Way and servicing corridor across our client's land which was sized for the development as contemplated at the time the same was registered. The additional units applied for will cause servicing concerns not properly addressed by the infrastructure currently in place. The additional units will also cause a substantial increase in traffic which would traverse our client's lands as the most direct route to Gainsborough Road. Furthermore, the substantial increase in units will cause other related traffic concerns associated with parking. Our client's commercial development must have available parking as it provides medical and health care services from 30-40 health care practitioners and available parking is a necessity. The foreseeable management of the increased parking demands caused by the Application is a great concern not only for our client but for the viability of the health care practitioners who occupy the property.

In addition to the foregoing, the contemplated development currently has no construction access other than across our client's property. Neither the internal roadway nor the existing land use can in any way accommodate such a development occurring.

- 2 -

In consideration of the foregoing, and in consideration of other concerns not detailed herein, the City should not move forward with the proposed Application. Should it choose to do so, our client intends to retain litigation counsel in order to adequately represent its interests at all levels considering the proposed Application.

Yours very truly,


MENEAR WORRAD
& ASSOCIATES



Brian K. Worrad
BKW:cb

Alana Riley (ariley@london.ca)

Josh Morgan (jmorgan@london.ca)

Re: Notice of Planning Applicant: Highland Communities Ltd., File Z:9247

We are writing to express our strong opposition to the above application and the proposed zoning by-law amendment.

When we were looking to relocate to London almost five years ago, we enquired about the zoning of adjacent properties and that factored into our decision to purchase our current home. We felt that our view and our desire for a quiet neighbourhood in retirement would not be severely impacted by any future development on adjacent properties.

In our opinion, the size and the density of the proposed development is entirely inappropriate for this very small location and, if it were to proceed, would have a tragic impact on traffic flow and the green, open feel of this area.

We respectfully ask that council deny this zoning by-law amendment.

Thank you,

Donald O. Astles
Patricia D. Astles

Hello Councillor Morgan and Alanna,

John Petersen called from _____, right beside the proposed site for Z-9247 and he would like to be put on the record as saying that he is not happy with this application. He has lived there for a long time, and although large buildings are inevitable and they have a 14-storey building behind them, he feels that 20 storeys are too high and that the building as it looks in the plans will be nearly on top of them. He feels that the proximity of the towers will negatively affect his enjoyment as well as the value of his property.

John would like to be notified of when there will be a public meeting on this application, please.

19 August 2020

Alanna Riley
Development Services
City of London
300 Dufferin Avenue
6th Floor
London, ON N6A 4L9
ariley@london.ca

Dear Alanna Riley,

Re: File: Z-9247
Zoning By-law Amendment – 978 Gainsborough Road, London

I am writing to you to express concerns regarding the proposed zoning by-law amendment at 978 Gainsborough Road.

The design of the development at 978 Gainsborough Road is concerning for the following reasons:

- The design of the building does not fit the Urban Design Guidelines for Hyde Park or existing surrounding context. The guidelines suggest that buildings should be oriented to the street in order to define the public space of the street and achieve a more urban development character. Setting the residential tower far back from the street prevents visibility from Gainsborough Road and sparks security concerns. The proposed future "service road" will not be a prominent passageway to provide active surveillance on the proposed building. The position of the building at the rear of the site favours vehicular over pedestrian type lifestyles. The prominent angle of the tower above the podium and rear podium does not address its surrounding properties and instead juxtaposes its context. This proposed development evokes the "tower in a park" strategy which has been proven to fail in promoting healthy and sustainable living and creating a succinct relationship with the surrounding community and context. The angle of the tower allows the residents of the proposed development to directly face the surrounding residential properties, impeding on residents' privacy and comfort. The imposing 20 stories introduces greater density than buildings currently on Gainsborough Road.
- The shadow study shows the office building north of the proposed development with little direct sunlight for most of the day, especially when that office building is intended to be occupied. The study also fails to capture the impact of the cast shadow close to sunrise and sunset when the shadow will have the greatest impact. Many surrounding municipalities take these factors into consideration when performing a sun study. It is our experience that the actual shadow of the building at 1030 Coronation Drive casts much further than what is depicted and would cause us to question the legitimacy of the shadow from the proposed 978 Gainsborough development.

/...2

- The desire to decrease the amount of landscaped open space is concerning due to the current flooding that occurs in transition seasons. The rear of the 978 Gainsborough property is a seasonal home to many migratory birds. We have already noticed the impacts of development in the area through the loss of habitat for many animals.

The density of the development at 978 Gainsborough Road is concerning for the following reasons:

- It is understood that a range of housing typologies, densities, and owned vs. rented apartments are required to meet the needs of all persons and families, however we believe the continued densification of the Hyde Park neighbourhood does not suit the existing context and Design Guidelines. The current site proposes an increased density of 320 units per hectare which is more than double the density of any comparable site in the area.
- Currently there is a new apartment building at the corner of South Carriage and Hyde Park (Drewlo), and another building identical to this one to be built next to it. The first building has not yet reached full capacity and has been available for lease since last fall. A six-storey apartment building is currently under construction at 1020 Coronation Drive and another high-rise apartment building is to be built on the property at 1018 - 1028 Gainsborough Road beside Ungers Market. It appears the precedent for high density rental development in this area is not being supported by actual occupancy in these new developments.
- The Hyde Park neighbourhood at Gainsborough and Coronation Drive is currently developing with two distinct housing typologies: low-density single-family homes and townhouses vs. high density condo and apartment buildings. In order to tie these two opposing typologies together, we advocate for mid-rise and mid-density intensification to create a built landscape which supports the diverse and varied community of Hyde Park. This is evident in the decision to build three story townhouses at 1040 Coronation Drive. By continuing to surround the 1040 Coronation Drive development with high-rise buildings, it takes away from a varied built landscape and imposes large buildings onto the townhome community.

Attached is a list of signatures of residents from Northcliffe Towns at 1040 Coronation Road, London. Thank you for taking our concerns into consideration when reviewing the proposed amendments to the zoning at 978 Gainsborough Road, London.

Sincerely,

Residents of Northcliffe Towns
1040 Coronation Road, London, ON

Cc: Josh Morgan, Ward Councillor
jmorgan@london.ca

Comments on Revised Notice

I received a notice for a zoning amendment, file OZ-9247. I would like to vote NO to this application, please and thank you.

Dan Bee

Dear Corrine & Alanna,

I'm writing to you with regards to the yet again, proposed amendment to the zoning for 978 Gainsborough road.

This application was previously rejected for the few reasons outlined below as indicated by your current and former colleagues in 2021.

*The request to amend Zoning By-law No. Z.-1 to change the zoning of the subject property FROM a Holding Residential R9 Special Provision (h-5.h-11.h-17. R9-7(17).H50) Zone, TO a Holding Residential R9 Special Provision Bonus (h-5.h-11.h-17. R9-7().H70*B-()) Zone, BE REFUSED for the following reasons:*

1. The proposed development is not consistent with the Provincial Policy Statement, 2020, which promotes intensification and redevelopment in appropriate locations.

2. *The proposed development does not conform to the in-force policies of The London Plan, including but not limited to:*

- i. the Key Directions relating to the strategic location of more intensive forms of development, high-intensity development to strategic locations- along rapid transit corridors and within the Primary Transit Area and new development that is a good fit within an existing neighbourhood.*
- ii. the City Structure Plan policies of The London Plan that create a hierarchy of residential intensity with the most intensive forms of development directed to the Downtown, Transit Villages and at station locations along the Rapid Transit Corridors.*

My wife, Lisa Clark and I, owners and occupants of _____ oppose and reject this proposal.

It is inconsistent with any existing structures, approved and standing. This proposal will further encase _____ in ultra tall structures, nearly all around us.

There are no comparable height towers in the area nor is this area a part of the rapid transit plan.

We, as with many other neighbours, do not see this a fit for the area and agree with Council's previous decision to reject the development.

We encourage you to reject this decision again.

Please consider who has to live amongst these gigantic towers and don't let these developers negatively impact our wellbeing for their profit.

Thank you,

Matthew Bird & Lisa Clark

Hello,
I hope all is well.

I am just inquiring about the proposed plan of subdivision and zoning amendment for both 954 & 978 Gainsborough Road.

As much as new housing is trying to be tabled and developed, the environmental impact needs to be assessed as well. I believe there is a percentage of greenspace that needs to be maintained and this has not been outlined in the proposals of either document.

Also, you have probably already heard from others that the sightline that was an initial proposition of the neighborhood will be severely impacted due to the new infrastructure being tabled.

What is the impact of the nearby ponds and wildlife?

Was the farmhouse that was torn down not a historical structure? Why was the dismantling of a historical structure allowed to take place?

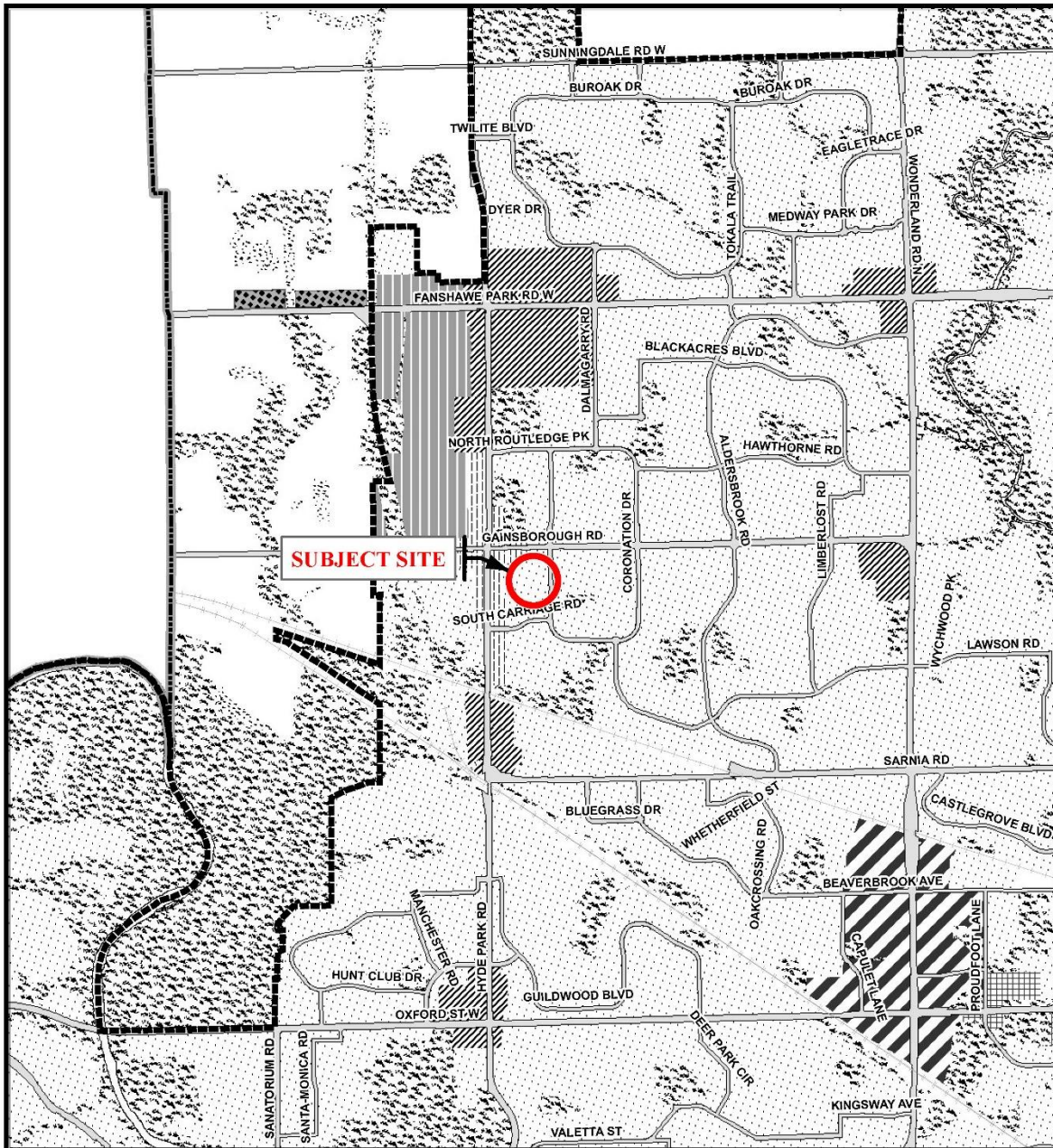
When we bought my home in 2017, we were enamoured by the view of the field, pumpkins (when in season) and the farmhouse that resided directly behind us. We were expecting at the time and wanted our child and now children to grow up with this same perspective. The destruction and lack of communication in the process that has followed has really dampened my opinion of the city as a whole. London is supposed to be the "Forest City." We have not just become another engulfment of the metropolis that is Toronto.

As outlined by the questions above, I and my family are not in favor of the proposed plans for 954 and 978 Gainsborough Road.

Sincerely, Sangev

Appendix D – Relevant Background

The London Plan – Map 1 – Place Types



Legend

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

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

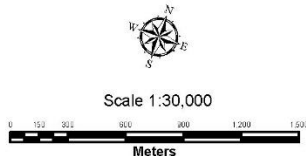
At the time of the printing of this map, the Rapid Transit EA is in progress. This map shows the Rapid Transit Corridors and Urban Corridors to recognize potential alignments. These Place Types will be modified to align with the results of the EA process for the final version of The London Plan.

CITY OF LONDON

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Development Services

LONDON PLAN MAP 1 - PLACE TYPES -

PREPARED BY: Planning Services



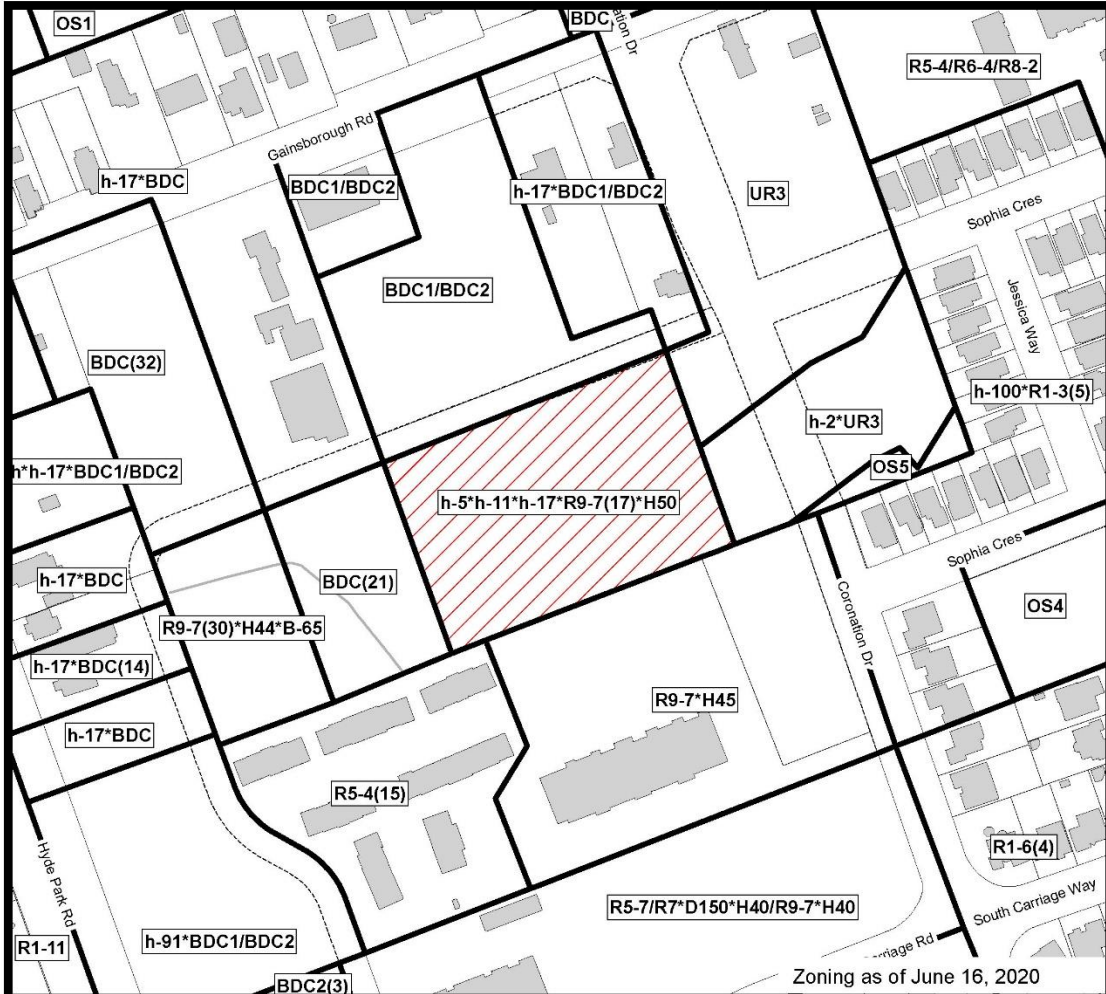
File Number: Z-9247

Planner: AR

Technician: RC

Date: July 27, 2020

Zoning By-law Z.-1 – Zoning Excerpt



COUNCIL APPROVED ZONING FOR THE SUBJECT SITE:

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

- | | |
|--|---|
| <ul style="list-style-type: none"> R1 - SINGLE DETACHED DWELLINGS R2 - SINGLE AND TWO UNIT DWELLINGS R3 - SINGLE TO FOUR UNIT DWELLINGS R4 - STREET TOWNHOUSE R5 - CLUSTER TOWNHOUSE R6 - CLUSTER HOUSING ALL FORMS R7 - SENIOR'S HOUSING R8 - MEDIUM DENSITY/LOW RISE APTS. R9 - MEDIUM TO HIGH DENSITY APTS. R10 - HIGH DENSITY APARTMENTS R11 - LODGING HOUSE DA - DOWNTOWN AREA RSA - REGIONAL SHOPPING AREA CSA - COMMUNITY SHOPPING AREA NSA - NEIGHBOURHOOD SHOPPING AREA BDC - BUSINESS DISTRICT COMMERCIAL AC - ARTERIAL COMMERCIAL HS - HIGHWAY SERVICE COMMERCIAL RSC - RESTRICTED SERVICE COMMERCIAL CC - CONVENIENCE COMMERCIAL SS - AUTOMOBILE SERVICE STATION ASA - ASSOCIATED SHOPPING AREA COMMERCIAL OR - OFFICE/RESIDENTIAL OC - OFFICE CONVERSION RO - RESTRICTED OFFICE OF - OFFICE | <ul style="list-style-type: none"> RF - REGIONAL FACILITY CF - COMMUNITY FACILITY NF - NEIGHBOURHOOD FACILITY HER - HERITAGE DC - DAY CARE OS - OPEN SPACE CR - COMMERCIAL RECREATION ER - ENVIRONMENTAL REVIEW OB - OFFICE BUSINESS PARK LI - LIGHT INDUSTRIAL GI - GENERAL INDUSTRIAL HI - HEAVY INDUSTRIAL EX - RESOURCE EXTRACTIVE UR - URBAN RESERVE AG - AGRICULTURAL AGC - AGRICULTURAL COMMERCIAL RRC - RURAL SETTLEMENT COMMERCIAL TGS - TEMPORARY GARDEN SUITE RT - RAIL TRANSPORTATION "h" - HOLDING SYMBOL "D" - DENSITY SYMBOL "H" - HEIGHT SYMBOL "B" - BONUS SYMBOL "T" - TEMPORARY USE SYMBOL |
|--|---|

CITY OF LONDON

PLANNING SERVICES / DEVELOPMENT SERVICES

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



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

FILE NO:

Z-9247

AR

MAP PREPARED:

2020/07/27

RC

1:2,500

0 12.525 50 75 100 Meters