



April 3, 2024

City of London  
Mayor and Members Planning and Environment Committee

**Re: Byron Gravel Pits Secondary Plan, File 0-8434-Byron Baseline Policy Area  
Submission on behalf of Boler Heights Development Inc. and 1044 Baseline Developments  
Inc.(Auburn Developments Inc and Orange Rock Development Inc.)**

We are owners of lands municipally known as 2100 Colonel Talbot Road and 1044 Baseline Rd and on behalf of Boler Heights Developments Inc. and 1044 Baseline Developments Inc., we submit the following for your review and consideration.

We are all excited about the opportunities that await the City from both a recreational perspective, as well as a housing perspective, and thank Planning staff and others involved for bringing forth the Byron Gravel Pit Secondary Plan for approval.

We agree with staff that this is a unique asset not only due to its development capability but also the future beauty and natural setting that will be available once the gravel pit license is surrendered providing this incredible opportunity for the City's current and future residents to live and enjoy.

We do appreciate the approach by staff in the preparation of the Secondary Plan which acknowledges the uniqueness of lands within and adjacent to the Byron Pit and the ability of these lands to fulfill many objectives of the London Plan including intensification forms of housing in support of the City of London targets.

The proposed Secondary Plan does recognize this unique context and staff has identified the highest forms of housing within the Byron Baseline Policy Area which we agree should be the focus of the high-rise forms of housing yet the permissions seem to fall short in the recognition of the areas ability to accommodate additional height without impacts and as such would seek modifications to the maximum height permissions.

In the analysis of the locational context and attributes of the area and the opportunities that exist, it is not only possible, but also desirable, for the City to increase intensification in the Byron Baseline Policy Area as there is little or no impact on larger neighborhood. Through a modest increase in height permissions the area can greatly assist in attaining the City intensification targets.

The lands within the Byron Baseline Policy Area have the attributes necessary for higher intensification: transportation capacity, and the ability to increase height without negatively impacting the larger community, proximity to commercial uses and access to a vast open space network. Although staff have considered these various attributes and has applied the higher order land use permissions as prescribed within the current London Plan, it also seems that the Province of Ontario as well as Council, as identified in various recent approvals, have strived to go beyond those permissions throughout the City and believe that the Byron Baseline Policy Area should also be considered for additional height permissions. In reviewing the pertinent documents, it becomes more evident that this area should surpass basic permissions as identified by the London Plan and that the Secondary Plan before you, can and should, do more given the proposed tiering and internalization of the building's height and the current objectives for intensification.

Increasing the height permissions within the Byron Baseline Policy Area, can be done without impacting the streetscape as the transition of building setbacks would be maintained as prescribed which is to 'tier' the increases in height away from the street and internalizing any impacts. Our proposed modest additions to the prescribed height permissions enables implementation of other desired goals of the plan more easily including providing flexibility for increased urban design opportunities while also incorporating 'green' technologies also being promoted with little to no impacts to the larger community. To fully utilize this opportunity "to do more", we would seek that height permissions be increased, while preserving the objective to 'tier' the height from Baseline inward while maintaining the goals to intensify.

We would ask PEC and members of Council to consider the following modifications to the Byron Baseline Policy Area to acknowledge a modest increase in height as well as to clarify the intent of transition of that height from Baseline.

Proposed modification to policy-(strikeout and replace with bold)

4.2.4 Built Form and Intensity

iv) The standard building height in the Byron Baseline Policy Area along the Byron Baseline Road frontage shall be four storeys, with the upper maximum of six storeys. At the future intersection of the road access points and Byron Baseline, the maximum height is nine storeys and the upper maximum is ~~42~~ **15** storeys. There shall be a transition to the interior of the Policy Area where the buildings shall have a standard maximum height of ~~42~~ **15** storeys with an upper maximum height of ~~48~~ **25** storeys for the lands fronting onto the Central Pond and Green Space Policy Area. Applications to exceed the standard maximum will be reviewed according to Our Tools part of the London Plan. Applications exceeding the upper maximum heights will not be permitted without amendment to this Plan in accordance with the Our Tools part of the London Plan.

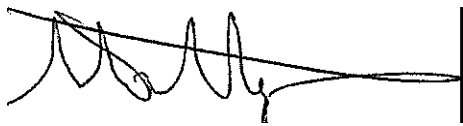
The proposed modifications to increase the standard maximums of the Byron Baseline Policy Area is consistent with the direction of Council to intensify where impacts are limited to existing neighborhoods such as exists in this Policy Area.

We thank you for considering this request and believe the spirit of the Plan is maintained and we will be able to meet the demands for growth and recreational opportunities.

Should you have any further questions, please contact me at your convenience.

Sincerely,

**Auburn Developments Inc. acting as agent for  
1044 Baseline Developments Inc and Boler Heights Developments Inc.**



Per Stephen Stapleton,  
Vice-President