

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: College Avenue Lofts Inc. (c/o York Developments)
193-199 College Avenue
File Number: OZ-8693, Ward 6
Public Participation Meeting

Date: May 22, 2024

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of College Avenue Lofts Inc. (c/o York Developments) relating to the property located at 193-199 College Avenue:

- (a) Council supports refusal of the request to amend the Official Plan for the City of London (1989) to change the designation of the subject lands **FROM** a Low Density Residential designation **TO** a Multi-Family, Medium Density Residential designation, for the following reasons:
- i) The requested amendment is not consistent with the Provincial Policy Statement, 2020, which promotes intensification and redevelopment in appropriate locations.
 - ii) The requested amendment does not conform to the 1989 Official Plan, including, but not limited to, the locational criteria of the Medium Density Residential designation, Permitted Uses, Density and Scale, Residential Intensification policies, the St. George/Grosvenor Neighbourhood Specific Residential Area policies, and the Policies for Near Campus Neighbourhoods.
 - iii) The proposed development represents an over-intensification of the site and does not satisfy the criteria of the Planning Impact Analysis.
- (b) Council supports refusal of the request to amend Zoning By-law No. Z.-1 to change the zoning of the subject property **FROM** a Residential R2 Special Provision (R2-2(7)) Zone **TO** a Residential R10 Bonus (R10-2*B-_) Zone, for the following reasons:
- i) The requested amendment is not consistent with the Provincial Policy Statement, 2020, which promotes intensification and redevelopment in appropriate locations.
 - ii) The requested amendment does not conform to the 1989 Official Plan, including, but not limited to, the locational criteria of the Medium Density Residential designation, Permitted Uses, Density and Scale, Residential Intensification policies, the St. George/Grosvenor Neighbourhood Specific Residential Area policies, and the Policies for Near Campus Neighbourhoods.
 - iii) The proposed development represents an over-intensification of the site and does not satisfy the criteria of the Planning Impact Analysis.
 - iv) The requested Residential R10 (R10-2) Zone is not in conformity with the requested Multi-Family, Medium Density Residential designation.
 - v) Density bonusing provisions have been removed from section 37 of the *Planning Act*.

Executive Summary

Summary of Request

The applicant has requested an amendment to the 1989 Official Plan for the City of London, to redesignate the property from Low Density Residential to Multi-Family,

Medium Density Residential.

The applicant has requested an amendment to the Zoning By-law Z.-1 to rezone the property from a Residential R2 Special Provision (R2-2(7)) Zone to a Residential R10 Bonus (R10-2*B-_) Zone. Special provisions would permit a maximum building height of 21.0 metres, a minimum front yard depth of 5.0 metres, a rear yard depth of 4.0 metres, an east interior side yard depth of 2.5 metres, and a maximum lot coverage of 45%.

The requested amendments would permit the development of a 6-storey, **43-unit** residential apartment building with a maximum height of 21.0 metres and density of 200 units per hectare.

Purpose and the Effect of Recommended Action

The recommended action is for Council to support refusal of the requested Official Plan amendment and Zoning By-law amendment.

Linkage to the Corporate Strategic Plan

This recommendation will contribute to the advancement of Municipal Council's 2023-2027 Strategic Plan in the following ways:

- **Strategic Plan Area of Focus: Housing and Homelessness**, by ensuring London's growth and development is well-planned and considers use, intensity, and form.
- **Strategic Plan Area of Focus: Wellbeing and Safety**, by promoting neighbourhood planning and design that creates safe, accessible, diverse, walkable, healthy, and connected communities.
- **Strategic Plan Area of Focus: 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

None.

1.2 Planning History

The application was initially submitted and deemed complete on October 11, 2016 and placed on hold at the request of the applicant. In September 2020, the applicant requested the application be taken off hold and that staff resume processing the application. No changes were made to the proposed development or requested amendments.

On February 8, 2024, the subject application OZ-8693 was appealed for lack of decision made under section 17(40) of the Planning Act. The appeal is active as case number OLT-24-000183. Council may endorse a position; however, is not able to approve or refuse the request. This report and the Council resolution would be considered by the OLT as part of the appeal proceedings.

1.3 Property Description and Location

The subject lands are located mid-block on the south side of College Avenue, west of Richmond Street and east of St. George Street, in the North London Planning District. The lands are currently developed with four (4) single detached dwellings.

Site Statistics:

- Current Land Use: Single detached dwellings
- Frontage: 49.2 metres (161.4 feet)
- Depth: 36.8 metres (120.7 feet) to 46.2 metres (151.6 feet)
- Area: 2,189 square metres (23,562.2 square feet)
- Shape: Irregular
- Located within the Built Area Boundary: Yes

- Located within the Primary Transit Area: Yes

Surrounding Land Uses:

- North: Mount Hope Centre for Long Term Care
- East: Medical Office
- South: Low Rise Apartment Building (3 storeys) and Single Detached Dwellings
- West: Single Detached Dwelling

Existing Planning Information:

- 1989 Official Plan Designation: Low Density Residential
- The London Plan Place Type: Neighbourhoods Place Type
- Existing Special Policies: St. George/Grosvenor Neighbourhood; Near-Campus Neighbourhoods
- Existing Zoning: Residential R2 Special Provision (R2-2(7)) Zone

Additional site information and context is provided in Appendix "A".



LOCATION MAP		Legend
<p>Address: 193-199 College Avenue</p> <p>File Number: OZ-8693</p> <p>Planner: Catherine Maton</p> <p>Date: 2024/04/16</p> <p>Corporation of the City of London Prepared By: Planning and Development</p>		<ul style="list-style-type: none"> Subject Site Buildings Assessment Parcels Driveways/ParkingLots
<p>0 4.5 9 18 27 36 Meters</p> <p>Scale 1:800</p>		<p>N</p>

Figure 1- Aerial Photo of 193-199 College Avenue and surrounding lands



Figure 2 - Streetview of 193-199 College Avenue (view looking SW)

2.0 Discussion and Considerations

2.1 Development Proposal

The applicant is proposing a six (6) storey apartment building containing 43 dwelling units. 51 parking spaces are proposed in an underground parking garage accessed from College Avenue. 33 bicycle parking spaces are also proposed.

The proposed development includes the following features:

- Land use: Medium Density Residential
- Form: Apartment Building
- Height: 6 storeys (20.4 metres)
- Residential units: 43
- Density: 196 units per hectare
- Gross floor area: 6,290 square metres
- Building coverage: 44.5%
- Parking spaces: 55 underground
- Bicycle parking spaces: 33 spaces
- Landscape open space: 46.6%

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

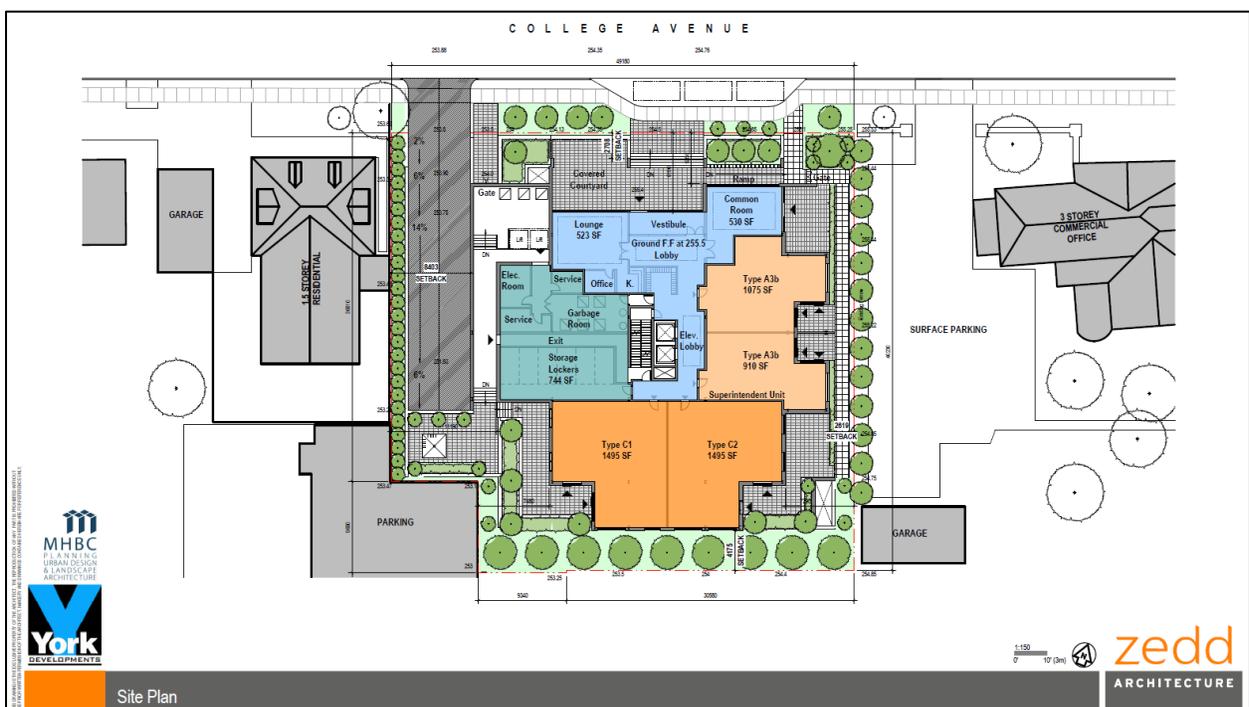


Figure 3 – Conceptual Site Plan (October 2016)



Figure 4 – Rendering – southwest (front) view from College Avenue (October 2016)



Figure 5 – Rendering – southeast (front) view from College Avenue (October 2016)

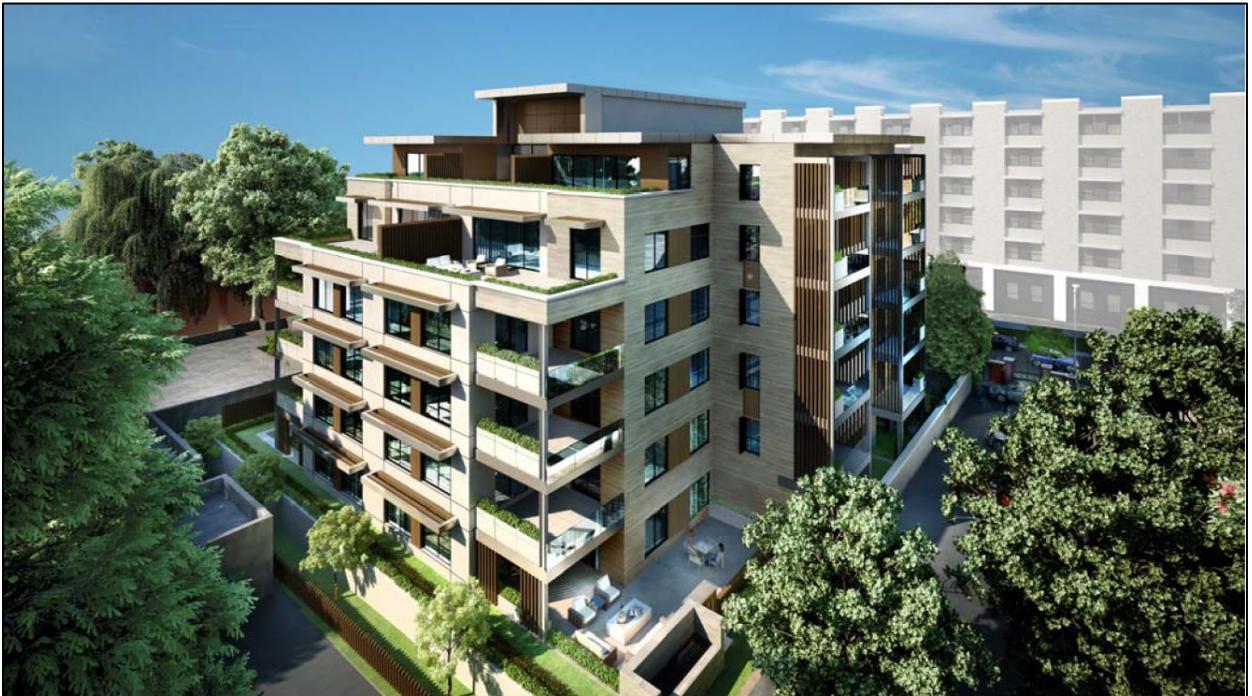


Figure 6 – Rendering – northwest (rear) view (October 2016)

Additional plans and drawings of the development proposal are provided in Appendix “B”.

2.2 Requested Amendments

The applicant has requested to redesignate the property from Low Density Residential to Multi-Family, Medium Density Residential in the 1989 Official Plan.

The applicant has requested an amendment to the Zoning Bylaw Z.-1 to rezone the property from a Residential R2 Special Provision (R2-2(7)) Zone to a Residential R10 Bonus (R10-2*B-_) Zone.

The following table summarizes the special provisions that have been proposed by the applicant.

Regulation (R10-2 Zone)	Required	Proposed
Building Height (Maximum)	N/A	21.0 metres
Front Yard Depth (Minimum)	7.0 metres to the podium and 8.0 metres to the tower	5.0 metres
Rear Yard Depth (Minimum)	7.0 metres to the podium and 8.0 metres to the tower	4.0 metres
East Interior Side Yard Depth (Minimum)	8.4 metres	2.5 metres
Lot Coverage (Maximum)	40%	45%

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:

- Intensity of development is not in keeping with the neighbourhood context
- Reduced interior side and rear setbacks provide insufficient separation from adjacent properties
- Impacts on heritage and insufficient Heritage Impact Assessment

Detailed internal and agency comments are included in Appendix “C” of this report.

2.4 Public Engagement

On October 26, 2016, Notice of Application was sent to 136 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 October 27, 2016. A “Planning Application” sign was also placed on the site. Due to the elapsed time since the initial circulation in 2016, a new Notice of Application was mailed on September 24, 2020 and published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on September 25, 2020 upon reinitiation of file processing.

On May 1, 2024, Notice of Public Meeting was sent to 198 property owners and residents in the surrounding area. Planning & Development staff also contacted the property management company for rental apartment buildings in the vicinity, requesting Notice be posted in a location visible to residents. Efforts were made to contact the Mount Hope Centre for Long Term Care to request Notice be posted in a location visible to residents. Lastly, Notice of Public Meeting was published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on May 2, 2024.

There were nine (9) responses received during the public consultation period in 2016 and eight (8) responses received during the public consultation period in 2020. Comments received were considered in the review of this application and are addressed in Section 4.0 of this report.

Concerns expressed by the public relate to:

- Request to convert College Avenue to a one-way street
- The proposed bonusable features are not commensurate for the density of development
- Requested amendments are not in conformity with the 1989 Official Plan or The London Plan
- Proposed density and height are inconsistent with policy and out of character with the existing residential neighbourhood
- Parking concerns
- Design not in keeping with the character of the neighbourhood
- Impact on adjacent heritage properties
- Over-intensification
- Increased traffic

Detailed public comments are included in Appendix “D” of this report.

2.5 Policy Context

The Planning Act and the Provincial Policy Statement, 2020

The Provincial planning policy framework is established through the *Planning Act* (Section 3) and the *Provincial Policy Statement, 2020 (PPS)*. The *Planning Act* requires that all municipal land use decisions affecting planning matters 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 (PPS 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 (PPS 1.4.1).

Planning authorities shall identify appropriate locations and promote opportunities for *transit-supportive* development, accommodating a significant supply and range of *housing options* through *intensification* and *redevelopment* where this can be accommodated taking into account existing building stock or areas, including *brownfield sites*, and the availability of suitable existing or planned *infrastructure* and *public service facilities* required to accommodate projected needs (PPS 1.1.3.3).

Planning authorities are further directed to permit and facilitate all housing options required to meet the social, health, economic and well-being requirements of current and future residents as well as all types of residential intensification, including additional residential units and redevelopment (PPS 1.4.3b)). Densities for new housing which efficiently uses land, resources, infrastructure and public service facilities, and supports the use of active transportation and transit in areas where it exists or is to be developed, is promoted by the PPS (PPS 1.4.3d)).

Planning authorities shall ensure to identify areas where growth or development will be directed, including the identification of nodes and the corridors linking these nodes (PPS 1.2.4 and 1.2.5). The subject lands are not located within a node or along a major corridor, but rather mid-block along a local street.

The PPS is supportive of appropriate development standards which facilitate intensification, redevelopment, and compact form (PPS 1.1.3.4). The PPS also identifies that long term economic prosperity should be supported by encouraging a sense of place by promoting a well-designed built form (PPS 1.7.1e)).

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. In staff’s opinion the proposed apartment building is seeking an intensity and built form

which is inconsistent with the established land use pattern and surrounding neighbourhood.

The PPS directs that significant built heritage resources and significant cultural heritage landscapes be conserved (PPS 2.6.1). Planning authorities shall not permit development and site alteration on adjacent lands to protect heritage properties except where the proposed development and site alteration has been evaluated and it has been demonstrated that the heritage attributes of the protected heritage properties will be conserved (PPS 2.6.3).

The four (4) consolidated properties that form the subject lands are all Listed heritage properties under Part IV of the *Ontario Heritage Act*. In addition, the subject lands are directly adjacent to other Listed heritage properties, as well as a Designated heritage property under Part IV of the *Ontario Heritage Act*, municipally addressed as 835 Richmond Street. The existing buildings are proposed to be demolished to facilitate redevelopment of the site with the proposed apartment building.

The applicant submitted a Heritage Impact Assessment (MHBC Planning, August 2016) as part of the complete application, hereinafter referred to as the 'HIA'. Heritage Planning staff have reviewed the HIA and advised of several matters which were not adequately addressed. Heritage Planning staff recommended a new HIA be prepared to address these deficiencies. To date, a new HIA has not been submitted and staff are of the opinion that the cultural heritage considerations have not been sufficiently addressed. On this basis, it is staff's opinion that the requested amendments are not consistent with the PPS.

1989 Official Plan

The site is designated Low Density Residential in accordance with Schedule 'A' of the 1989 Official Plan and is subject to the St. George/Grosvenor Neighbourhood Specific Residential Area policies, as well as the Near-Campus Neighbourhoods policies. The applicant has requested to redesignate the subject lands to Multi-Family, Medium Density Residential (MFMDR) to facilitate the proposed development.

The MFMDR designation permits multiple-unit residential developments having a low-rise profile, and densities that exceed those found in Low Density Residential areas but do not approach the densities intended for the Multi-Family, High Density Residential designation. Residential uses that typically comprise medium density development include row houses, cluster houses, low-rise apartment buildings, and certain specialized residential facilities such as small-scale nursing homes, homes for the aged and rest homes (OP 3.3).

The London Plan, 2016

This application was accepted as complete in October 2016, after The London Plan was adopted by Council (June 2016) but before approval by the Province (December 2016). The applicant participated in The London Plan consultation process and subsequently filed site-specific appeals. The London Plan policies under appeal to the *Ontario Land Tribunal* and not in force and effect are indicated with an asterisk throughout this report. The London Plan policies under appeal are included in this report for informative purposes indicating the intent of City Council, but are not determinative for the purposes of this planning application.

The London Plan (TLP) includes evaluation criteria for all planning and development applications with respect to use, intensity and form, as well as with consideration of the following (TLP 1577-1579):

1. Consistency with the Provincial Policy Statement and all applicable legislation.
2. Conformity with the Our City, Our Strategy, City Building, and Environmental policies.
3. Conformity with the Place Type policies.
4. Consideration of applicable guideline documents.
5. The availability of municipal services.
6. Potential impacts on adjacent and nearby properties in the area and the degree

to which such impacts can be managed and mitigated.

7. The degree to which the proposal fits within its existing and planned context.

Staff are of the opinion that not all of the above criteria have been satisfied. An analysis of the deficiencies is addressed in Section 4.0 of this report.

3.0 Financial Impact/Considerations

None.

4.0 Key Issues and Considerations

4.1 Land Use

1989 Official Plan

The Low Density Residential designation is applied to lands that are primarily developed or planned for low-rise, low density housing forms including detached, semi-detached, and duplex dwellings. Where appropriate, some multiple-attached dwellings at densities similar to neighbouring detached units may be permitted (OP 3.2). Development shall result in net densities that range to an approximate upper limit of 30 units per hectare (OP 3.2.2). Residential intensification may be considered up to a maximum density of 75 units per hectare (OP 3.2.3.2).

The applicant has requested to redesignate the subject lands to Multi-Family, Medium Density Residential (MFMDR) to facilitate the proposed development. In addition to areas predominantly composed of existing or planned medium density residential development, the preferred locations for the MFMDR designation include lands in close proximity to Shopping Areas, Commercial Districts, designated Open Space areas or Regional Facilities; lands adjacent to a Multi-Family, High Density Residential designation; and, lands abutting an arterial, primary collector or secondary collector street.

Staff are of the opinion that the subject lands do not satisfy the locational criteria for re-designation to MFMDR. The subject lands are not located in an area that is predominantly composed of existing or planned medium density residential development. Notwithstanding the existing long-term care facility across the street, the subject lands are surrounded predominantly by existing single detached dwellings which are low rise in character. The lands are not in proximity to shopping areas or commercial districts, but are in proximity to public open space (Gibbons Park) and a regional facility (Mount Hope Centre for Long Term Care). Lastly, the lands are mid-block abutting a local street.

In addition to the locational criteria, consideration must also be given to the following criteria in designating lands MFMDR:

- i) *Compatibility: Development of the site or area for medium density residential uses shall take into account surrounding land uses in terms of height, scale and setbacks and shall not adversely impact the amenities and character of the surrounding area.*

Notwithstanding the 6 storey Mount Hope Centre for Long Term Care across the street, the surrounding development consists predominantly of 1.5-2.5 storey residential development and a 3 storey residential apartment building. Staff are of the opinion that the proposed 6 storey height, in combination with reduced front, rear, and interior side setbacks, will adversely affect the amenities and character of the surrounding area. Further, the only building stepback is proposed on the rear facade at the 5th storey; no stepbacks are provided on the east and west facades to provide a gentler transition in building height.

- ii) *Municipal Services: Adequate municipal services can be provided to accommodate the needs of the development.*

A Servicing Feasibility Study (Strik, Baldinelli, Moniz, May 2016) was submitted as part of the complete application confirming adequate capacity is available to service the site.

- iii) *Traffic: Traffic to and from the location should not have a significant impact on stable, low density residential areas.*

A Traffic Impact Assessment (BTE Engineering, May 2016), hereafter referred to as the 'TIA', was submitted as part of the complete application. The TIA concluded the proposed development would have little impact on the existing road network. City Transportation staff have reviewed and accepted the findings of the TIA.

- iv) *Buffering: The site or area is of suitable shape and size to accommodate medium density housing and to provide for adequate buffering measures to protect any adjacent low density residential uses.*

While staff agree the site is suitably shaped and sized for intensification, the setbacks for the proposed development are insufficient and offer little opportunities for buffering. A 4.1 metre rear yard setback is proposed adjacent to the low density residential properties fronting on St. James Street which does not sufficiently mitigate concerns for oversight and privacy.

The primary permitted uses in the MFMDR designation shall include multiple-attached dwellings, such as row houses or cluster houses; low-rise apartment buildings; rooming and boarding houses; emergency care facilities; converted dwellings; and small-scale nursing homes, rest homes and homes for the aged.

The London Plan, 2016

The subject site is in the Neighbourhoods Place Type as identified on *Map 1 – Place Types. *Table 10 - Range of Permitted Uses in Neighbourhoods Place Type permits the following: single detached, semi-detached, duplex, converted dwellings, townhouses, additional residential units, home occupations, and group homes. The lands are within the St. George/Grosvenor Neighbourhood and a Near-Campus Neighbourhood, as identified on *Map 7 – Specific Policy Areas.

Lands within the St. George/Grosvenor Neighbourhood will remain a predominantly low density, low-rise residential area despite continual redevelopment pressure for apartment buildings, expansions to existing hospitals, and office conversions (TLP *1018).

Based on the foregoing, staff are of the opinion that the proposed mid-rise apartment building use is not in conformity with The London Plan.

4.2 Intensity

1989 Official Plan

Development within areas designated Multi-Family, Medium Density Residential shall have a low-rise form and a site coverage and density that could serve as a transition between low density residential areas and more intensive forms of commercial, industrial, or high-density residential development (OP 3.3.3).

Development shall be subject to height limitations in the Zoning By-law which are sensitive to the scale of development in the surrounding neighbourhood. Normally height limitations will not exceed four storeys. In some instances, height may be permitted to exceed this limit, if determined through a compatibility report to be appropriate subject to a site-specific zoning by-law amendment and/or bonus zoning provisions (OP 3.3.3.i).

Medium density development will not exceed an approximate net density of 75 units per hectare (OP 3.3.3.ii). Exceptions to the density limit may be made without amendment to the Official Plan for developments which qualify for density bonusing under the provisions of section 19.4.4 of the 1989 Official Plan. Where exceptions to the usual

density limit of 75 units per hectare are made, the height limitations prescribed in Section 3.3.3.i) will remain in effect. Developments which are permitted to exceed the density limit of 75 units per hectare shall be limited to a maximum density of 100 units per hectare.

The proposed development consists of a 6 storey, 43-unit residential apartment building which equates to a residential density of 196 units per hectare. As such, the height exceeds the four storey height limitation established in section 3.3.3.i), as well as the 75 unit per hectare density limitation established in section 3.3.3.ii).

To permit an increased maximum density, the applicant has requested a bonus zone pursuant to sections 3.3.3.ii) and 19.4.4 of the 1989 Official Plan. However, legislative changes through Bill 108 removed density bonusing provisions from section 37 of the *Planning Act*, and new bonus zones can no longer be approved by Council. The applicant did not amend their requested zoning after Bill 108 came into effect, therefore there is no legal mechanism for Council to approve the requested bonus zone.

Section 3.3.3.ii) limits increases in density through bonusing to a maximum density of 100 units per hectare, which the proposed development exceeds at 196 units per hectare. As such, the proposed height and density both exceed the height and density permitted with bonusing in the requested MFMDR designation, and are not in conformity with the 1989 Official Plan. It should be noted that the proposed density also exceeds the standard maximum density of 150 units per hectare permitted in the Multi-Family, High Density Residential designation.

The London Plan, 2016

The subject site is on a Neighbourhood Street as identified on Map 3 – Street Classifications. In the Neighbourhoods Place Type, development on a Neighbourhood Street is permitted up to a maximum height of 2.5 storeys in accordance with *Table 11 – Range of Permitted Heights in Neighbourhoods Place Type. On this basis, the proposed 6 storey building height is not in conformity with The London Plan. However, it should be noted that since this application was submitted, the maximum permitted height on a Neighbourhood Street has been increased to 3 storeys.

4.3 Form

1989 Official Plan

One of the overall objectives for the MFMDR designation is to encourage the development of well-designed and visually attractive forms of multi-family, medium density housing (OP 3.1.3.iii). Development proposals are further guided by the urban design principles in Chapter 11 for evaluation and review, including:

- v) *Architectural Continuity: The massing and conceptual design of new development should provide for continuity and harmony in architectural style with adjacent uses which have a distinctive and attractive visual identity or which are recognized as being of cultural heritage value or interest.*

The site is located in an area with architectural and cultural heritage significance, as it abuts several Listed heritage properties and a Designated heritage property. The area is largely characterized by existing low rise residential uses, save and except the existing long term care facility to the north of the site. The massing of the building has not been designed to mitigate impacts on adjacent low rise residential properties, with limited building stepbacks provided and no increased setbacks to offer a gentler transition in height. The only building stepback is proposed on the rear facade at the 5th storey; no stepbacks are provided on the east and west facades aside from the single storey covered parking garage ramp in the west interior side yard.

- viii) *Pedestrian Traffic Areas: In pedestrian traffic areas, new development should include street-oriented features that provide for the enhancement of the pedestrian environment, such as canopies, awnings, landscaped setbacks and sitting areas.*

Staff commend the applicant for the inclusion of street-oriented features to assist in the enhancement of the pedestrian environment, including a covered courtyard and landscaping along College Avenue. However, a reduced building height and inclusion of a stepback on the front façade would assist in achieving a more human-scale design to further enhance the pedestrian environment along College Avenue. Staff recommend the ground floor units located along the College Avenue frontage be designed to include individual access to the street, the proposed patios should be treated as front porches in order to animate the street edge. The inclusion of appropriately sized and safe pedestrian connections between the proposed building and the City sidewalks along the adjacent street frontages is also recommended.

- ix) *Access to Sunlight: The design and positioning of new buildings should have regard for the impact of the proposed development on year-round sunlight conditions on adjacent properties and streets. In reviewing proposed developments, access to sunlight for adjacent properties should be maximized to enhance the potential for energy conservation and the amenity of residential areas and open space areas, such as parkettes and outdoor plazas.*

A Shadow Study was not submitted as part of the complete application therefore the risk of shadow impacts is unknown. The site should be redesigned with appropriate setbacks from the rear and side yards, where units are facing into those yards, to provide for adequate access to sunlight and privacy for adjacent properties.

- x) *Landscaping: Landscaping should be used to conserve energy and water, enhance the appearance of building setback and yard areas, contribute to the blending of new and existing development and screen parking, loading, garbage and service facilities from adjacent properties and streets.*

With the requested setback reductions, limited landscaping and tree planting opportunities are available at grade to buffer the proposed development from neighbouring properties. Further, the increased lot coverage offers little opportunity for an adequately sized common outdoor amenity area on site.

- xiv) *Privacy: To the extent feasible, the design and positioning of new buildings should minimize the loss of privacy for adjacent residential properties.*

Privacy concerns were raised by the public through the circulation of the application. The proposed building presents concerns for overlook into private amenity spaces of adjacent properties. The building does not offer a low or mid-rise transition from the adjacent properties to the rear, resulting in an imposing mass and privacy concerns. The site should be redesigned with appropriate setbacks from the rear and side yards, where units are facing into those yards, to provide for adequate access to sunlight and privacy for adjacent properties.

While efforts have been made on the site and building design, the proposed intensity and built form is not appropriate nor compatible within the context of the existing neighbourhood. Staff have provided recommendations for design refinements to address the form-based concerns, which have not been incorporated into the design to date. In accordance with section 3.7, a Planning Impact Analysis is to be used to evaluate applications for an Official Plan amendment and/or zone change, to determine the appropriateness of a proposed change in land use, and to identify ways of reducing any adverse impacts on surrounding uses. The Planning Impact Analysis is contained in Appendix "E" and addresses matters of both intensity and form.

The London Plan

All planning and development applications will conform with the City Design policies of The London Plan (TLP 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 (TLP 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 (TLP 252_ and 253_).

High and mid-rise buildings should be designed to express three defined components: a base, middle, and top (TLP 289):

Base

The base should establish a human-scale façade with active frontages including, where appropriate, windows with transparent glass, forecourts, patios, awnings, lighting, and the use of materials that reinforce a human-scale (TLP 289_1). While efforts have been made through the inclusion of a covered courtyard and landscaping, a reduced building height and the inclusion of a stepback is recommended to provide an improved transition in height and human-scale to further enhance the pedestrian environment along College Avenue.

Middle and Top

The middle should be visually cohesive with, but distinct from, the base and top (TLP 289_2). The middle of the building is the portion of the building above the podium-base and consists of the residential tower. The top should provide a finishing treatment, such as roof or a cornice treatment, to hide and integrate mechanical penthouses into the overall building design (TLP 289_3).

The middle of the proposed building is differentiated from the base through the use of a canopy over the principle entrance, and from the top through the use of transparent glazing on the front façade at the 6th storey. Building elevations are provided in Appendix “B”.

Although staff is satisfied the proposed building provides a defined base, middle, and top, the design features incorporated into the building do not sufficiently mitigate impacts of the proposed intensity on adjacent properties. A lower building height with enhanced stepbacks and setbacks would improve the building’s compatibility with the existing context and adjacent heritage buildings.

The application was reviewed by the Urban Design Peer Review Panel (UDPRP) on October 21, 2020. Full comments from the UDPRP are provided in Appendix “C”. However, it should be noted that since this application was submitted, the UDPRP has been dissolved.

4.4 Near-Campus Neighbourhoods

Near-Campus Neighbourhoods are identified as extremely valuable city neighbourhoods that will be planned to enhance their livability, diversity, vibrancy, culture, sense of place, and quality of housing options for all (TLP 963 and 964; OP 3.5.19.3). The policies of The London Plan and 1989 Official Plan establish a number of planning goals in an effort to support this vision for these neighbourhoods (TLP *965; OP 3.5.19.4.). These goals are intended to serve as an additional evaluative framework for all planning applications within Near-Campus Neighbourhoods, and include:

- Planning for residential intensification in a proactive, coordinated, and comprehensive fashion;
- Identifying strategic locations where residential intensification is appropriate within Near-Campus Neighbourhoods and which use strong transit connections to link these opportunities to campuses;
- Avoiding incremental changes in use, density, and intensity that cumulatively lead to undesirable changes in the character and amenity of streetscapes and neighbourhoods;
- Encouraging a balanced mix of residential structure types at appropriate locations while preserving stable residential areas and recognizing areas that have already absorbed significant amounts of intensification;
- Encourage appropriate forms of intensification that support the vision for Near-Campus Neighbourhoods and encouraging residential intensification in mid-rise and high-rise forms of development;

- Directing residential intensification to significant transportation nodes and corridors and away from interior of neighbourhoods;
- Utilizing zoning to allow for residential intensification which is appropriate in form, size, scale, mass, density, and intensity;
- Ensuring that residential intensification projects incorporate urban design qualities that enhance streetscapes and contribute to the character of the neighbourhood while respecting the residential amenity of nearby properties.
- Encourage affordable housing opportunities; and,
- Ensure intensification is located and designed to respect the residential amenity of nearby properties.

In Near-Campus Neighbourhoods, residential intensification or an increase in residential intensity may be permitted in the Neighbourhoods Place Type and MFMDR and MFHDR designations where the following criteria is met (*968; OP 3.5.19.9):

- The proposed development is consistent with *Tables 10 to 12 in the Neighbourhoods Place Type;
- The development provides for adequate amenity area;
- Mitigation measures are incorporated which ensure surrounding residential land uses are not negatively impacted;
- The proposal does not represent a site-specific amendment for a lot that is not unique within its context and does not have any special attributes;
- The proposal is appropriate in size and scale and does not represent over-intensification of the site; and
- The proposal establishes a positive and appropriate example for similar locations in the Near-Campus Neighbourhoods areas.

Policies *969 of The London Plan and 3.5.19.5 of the 1989 Official Plan further discourage forms of intensification within Near-Campus Neighbourhoods that:

- Are inconsistent with uses and intensity shown in *Tables 10 to 12 of The London Plan;
- Are within neighbourhoods that have already absorbed significant amounts of residential intensification and/or residential intensity;
- Require multiple variances that, cumulatively, are not in keeping with the spirit and intent of the zoning that has been applied;
- Are located on inadequately sized lots that do not reasonably accommodate the use, intensity or form of the proposed use;
- Contain built forms that are not consistent in scale and character with the neighbourhood;
- Continue an ad-hoc and incremental trend towards residential intensification within a given street, block or neighbourhood.

Residential Intensification in the form of medium and large-scale apartment buildings situated at appropriate locations in the MFMDR and MFHDR designations are preferred in Near-Campus Neighbourhoods (OP 3.5.19.6). In areas designated MFMDR and MFHDR, planning applications to allow for Residential Intensification or Residential Intensity are directed to those areas located along arterial roads and designated accordingly (OP 3.5.19.9).

Urban design qualities are to be incorporated into the design to ensure intensification projects contribute to the character of the neighbourhood while respecting the residential amenity of nearby properties. Zoning is to be utilized to ensure residential intensification occurs in a manner which is appropriate in form, size, scale, mass, density, and intensity. The proposed development does not satisfy these policies, as the intensity and density far exceed the maximum contemplated by the proposed MFMDR designation and the Neighbourhoods Place Type.

The subject lands are not located on an arterial road or in a strategic location where residential intensification would be appropriate. Although medium and large-scale forms of redevelopment are preferred in Near-Campus Neighbourhoods, these forms are directed to significant transportation nodes and corridors, away from the interior of neighbourhoods. The proposed form, scale, mass, density, and intensity are not appropriate for the site, as detailed in the Planning Impact Analysis contained in

Appendix D of this report.

Although the site is of a suitable size and shape to accommodate residential intensification within the current policy framework, and the consolidation of four properties would result in a coordinated and comprehensive approach to development, the intensity of the proposed development would result in over-intensification of the site and impacts on the residential amenity of nearby properties.

Based on the above, the proposed development does not satisfy the criteria for residential intensification in the Near-Campus Neighbourhoods.

4.5 Requested Zoning

The applicant has requested a Residential R10 Bonus (R10-2*B-_) Zone. The Residential R10 Zone provides for and regulates the highest density residential developments in the form of apartment buildings, and is more appropriately directed to areas designated MFHDR in the 1989 Official Plan. The requested R10-2 Zone variation permits a maximum density of 200 units per hectare, which far exceeds the maximum density of 75 units per hectare (or 100 units per hectare with bonusing) contemplated in the requested MFMDR designation.

As a result of the legislative changes through Bill 108, density bonusing provisions have been removed from section 37 of the *Planning Act* and new bonus zones cannot be approved by Council. The applicant did not amend their requested zoning after Bill 108 came into effect and there is no longer a legal mechanism for Council to approve the requested bonus zone.

Conclusion

The applicant has requested an amendment to the 1989 Official Plan for the City of London, to redesignate the property from Low Density Residential to Multi-Family, Medium Density Residential. The applicant has further requested an amendment to the Zoning By-law Z.-1 to rezone the property from a Residential R2 Special Provision (R2-2(7)) Zone to a Residential R10 Bonus (R10-2*B-_) Zone. The requested amendments would permit the development of a 6-storey, 43-unit residential apartment building with a maximum height of 21.0 metres and density of 200 units per hectare.

The recommended action is for Council to support refusal of the requested Official Plan amendment and Zoning By-law amendment. The requested amendments are not consistent with the Provincial Policy Statement, 2020; are not in conformity with the 1989 Official Plan; the proposed development represents an over-intensification of the site and does not satisfy the criteria of the Planning Impact Analysis; the requested Residential R10 (R10-2) Zone is not in conformity with the requested Multi-Family, Medium Density Residential designation; and density bonusing provisions have been removed from section 37 of the *Planning Act*.

Prepared by: Catherine Maton, 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

Copy:
Britt O'Hagan, Manager, Current Development
Mike 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	Single detached dwellings
Frontage	49.2 metres (161.4 feet)
Depth	36.8 metres (120.7 feet) to 46.2 metres (151.6 feet)
Area	2,189 square metres (23,562.2 square feet)
Shape	Irregular
Within Built Area Boundary	Yes
Within Primary Transit Area	Yes

Surrounding Land Uses

North	Mount Hope Centre for Long Term Care
East	Medical Office
South	Low Rise Apartment Building (3 storeys) and Single Detached Dwellings
West	Single Detached Dwelling

Proximity to Nearest Amenities

Major Intersection	Oxford Street East and Richmond Street, 500 metres
Dedicated cycling infrastructure	St. George Street, 65 metres
London Transit stop	Richmond Street, 160 metres
Public open space	Doidge Park, 450 metres
Commercial area/use	Oxford Street East and Richmond Street, 500 metres
Food store	Oxford Street Valu-Mart, 500 metres (residential only)
Community/recreation amenity	Carling Heights Optimist Community Centre, 2.9 kilometres

B. Planning Information and Request

Current Planning Information

Current 1989 Official Plan Designation	Low Density Residential
Current Place Type	Neighbourhoods Place Type, Neighbourhoods Street
Current Special Policies	St. George/Grosvenor Neighbourhood; Near-Campus Neighbourhoods
Current Zoning	Residential R2 Special Provision (R2-2(7)) Zone

Requested Special Provisions

Regulation (R10-2 Zone)	Required	Proposed
Building Height (Maximum)	N/A	21.0 metres
Front Yard Depth (Minimum)	7.0 metres to the podium and 8.0 metres to the tower	5.0 metres
Rear Yard Depth (Minimum)	7.0 metres to the podium and 8.0 metres to the tower	4.0 metres
East Interior Side Yard Depth (Minimum)	8.4 metres	2.5 metres
Lot Coverage (Maximum)	40%	45%

C. Development Proposal Summary

Development Overview

The applicant is proposing a six (6) storey apartment building containing 43 dwelling units. 51 parking spaces are proposed in an underground parking garage accessed from College Avenue. 33 bicycle parking spaces are also proposed.

Proposal Statistics

Land use	Medium Density Residential
Form	Apartment Building
Height	6 Storeys (20.4 metres)
Residential units	43
Density	196 units per hectare
Gross floor area	6,290 square metres
Building coverage	44.5%
Landscape open space	46.6%
New use being added to the local community	No

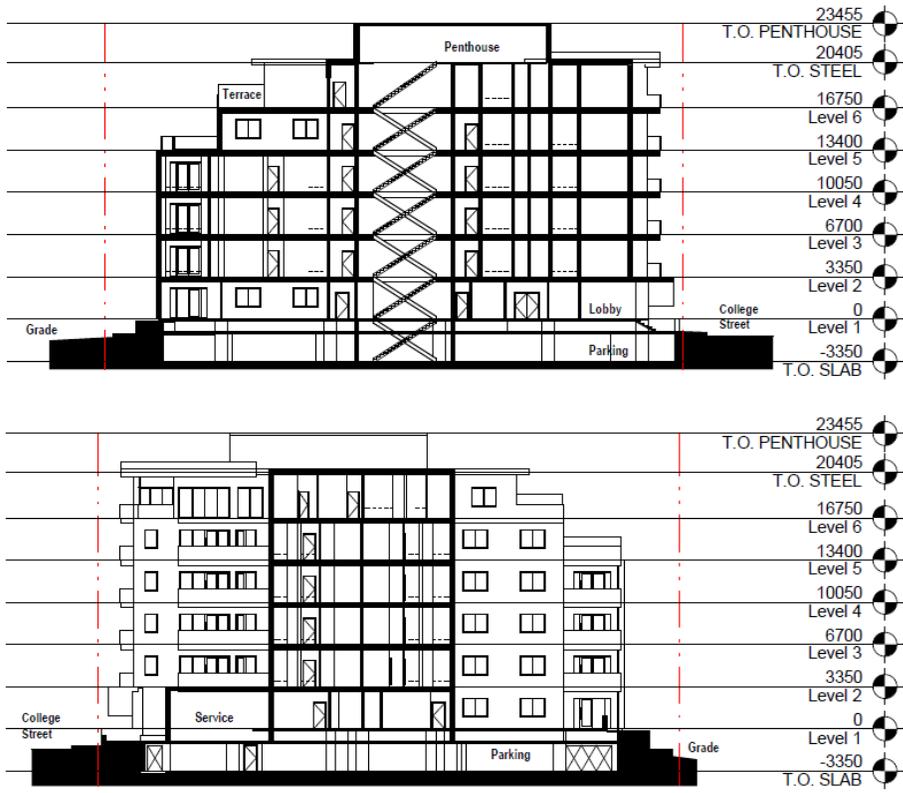
Mobility

Parking spaces	55 underground
Vehicle parking ratio	1.27 spaces per unit
New electric vehicles charging stations	0
Secured bike parking spaces	33
Secured bike parking ratio	0.76 spaces per unit
Completes gaps in the public sidewalk	NA
Connection from the site to a public sidewalk	Yes
Connection from the site to a multi-use path	NA

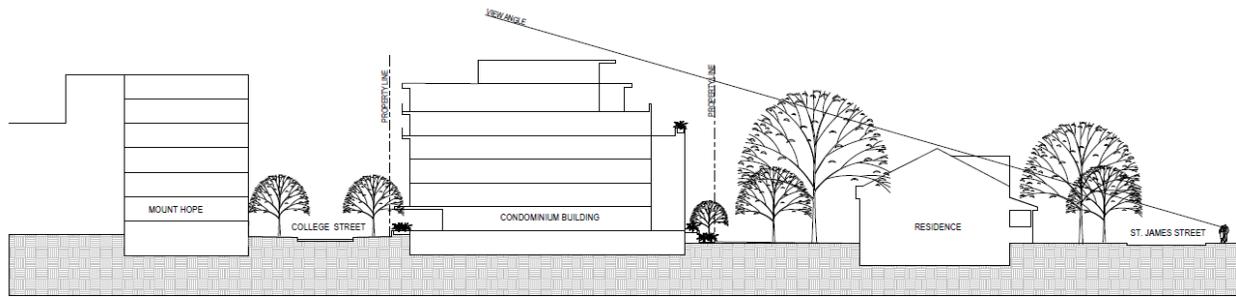
Environment

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

Appendix B – Additional Plans and Drawings



Building section drawings (October 2016)



NORTH - SOUTH STREET SECTION



VIEWS NORTH FROM ST. JAMES STREET

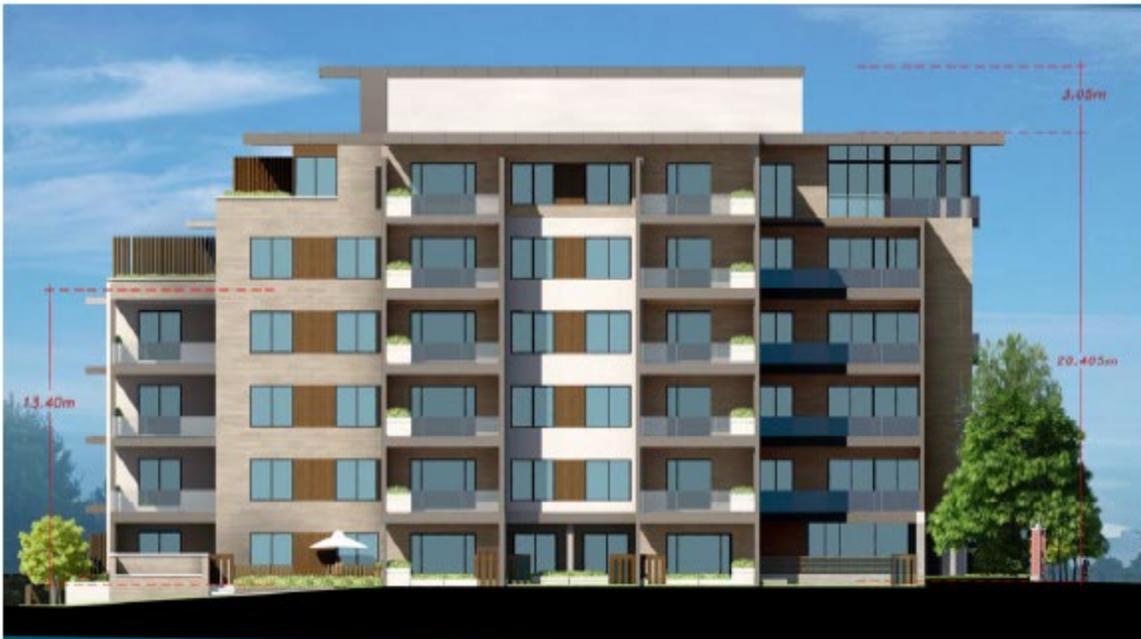


North to south street section drawing (October 2016)

NORTH ELEVATION



EAST ELEVATION



North and east elevations (October 2016)

SOUTH ELEVATION



WEST ELEVATION



South and west elevations (October 2016)

Appendix C – Internal and Agency Comments

2016 Circulation:

London Advisory Committee on Heritage (LACH) – November 9, 2016

That the following actions be taken with respect to the Notice dated October 26, 2016, from J. Adema, Planner II, with respect to the application by MHBC Planning Ltd., relating to the properties located at 193 to 199 College Avenue:

- a) the Civic Administration BE ADVISED that the LACH is satisfied with the research in the Heritage Impact Assessment, dated August 4, 2016 prepared by MacNaughton Hermsen Britton Clarkson Planning Limited (MHBC), for the properties located at 193 to 199 College Avenue;
- b) the Civic Administration BE ADVISED that the LACH has no concerns with potential impacts on the subject property;
- c) the Civic Administration BE ADVISED that LACH expressed concerns with potential impacts on neighbouring heritage properties and suggestions related to the following:
 - i) the massing as the proposed building is bulky and intrusive on a small street;
 - ii) the scale of the proposed building;
 - iii) the setback of the proposed building;
 - iv) recommending a proposal that is more appropriate to the neighbourhood;
 - v) suggesting the implementation of historic elements, heritage building design and materials such as the extensive use of red brick and stone highlights; and,
 - vi) encouraging a building design with particular emphasis on the Moore house; and,
- d) the Civic Administration BE ADVISED that the LACH expressed concern with the impact on the property located at 189 College Avenue as it will be isolated.

Engineering – November 9, 2016

The City of London's Environmental and Engineering Services Department offers the following comments with respect to the aforementioned Official Plan and Zoning By-Law amendments application:

Verbatim comments as per the Transportation Division:

Details regarding access design will be discussed in greater detail during the site plan process.

Verbatim comments as per the WADE Division:

The sanitary sewer available for the subject lands is the municipal 200mm sanitary sewer on College Ave.

Verbatim comments as per the SWM Division:

The Stormwater Engineering has no objection to the above noted application, noting that additional comments will be provided upon future review of the site. The preliminary list of SWM issues to be considered by the applicant includes, but it is not limited to:

- 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; the City Design
- Requirements for on-site SWM controls which may include but not be limited to quantity/quality and erosion controls; the City's Waste Discharge and Drainage By-Law; 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 separator, SWM Best Management

Practices, grading and drainage design (minor, and major flows), storm drainage conveyance from external areas (including any associated easements), hydrological conditions, etc.

- The existing 300mm storm pipe along College Ave as replaced by the City in 2011(2011 Reconstruction Project) may not have sufficient capacity to accommodate the proposed redevelopment and therefore, capacity of the storm sewer on College Ave and downstream storm system to accommodate the proposed re-development should also be confirmed.

Please note that the subject lands are located in the Central Thames Subwatershed and therefore, the Developer 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.

Please note that this response has been made without input from the Water Engineering Division.

The above comments, among other engineering and transportation issues, will be addressed in greater detail when/if these lands come in for site plan approval.

Upper Thames River Conservation Authority – November 9, 2026

November 9, 2016

City of London – Planning Services
P.O. Box 5035
London, Ontario N6A 4L9

Attention: Justin Adema (sent via e-mail)

Dear Mr. Adema:

Re: File No. OZ-8693 - Application to Amend the Official Plan & Zoning By-Law
Applicant: MHBC Planning Ltd.
193-199 College Avenue, London, Ontario

The Upper Thames River Conservation Authority (UTRCA) has reviewed this application with regard for the policies in the *Environmental Planning Policy Manual for the Upper Thames River Conservation Authority (June 2006)*. These policies include regulations made pursuant to Section 28 of the *Conservation Authorities Act*, and are consistent with the natural hazard and natural heritage policies contained in the *Provincial Policy Statement (2014)*. The *Upper Thames River Source Protection Area Assessment Report* has also been reviewed in order to confirm whether the subject lands are located in a vulnerable area. The Drinking Water Source Protection information is being disclosed to the Municipality to assist them in fulfilling their decision making responsibilities under the Planning Act.

CONSERVATION AUTHORITIES ACT

These lands are not affected by any regulations (Ontario Regulation 157/06) made pursuant to Section 28 of the *Conservation Authorities Act*.

DRINKING WATER SOURCE PROTECTION

Clean Water Act

The *Clean Water Act (CWA)*, 2006 is intended to protect existing and future sources of drinking water. The Act is part of the Ontario government's commitment to implement the recommendations of the Walkerton Inquiry as well as protecting and enhancing human health and the environment. The CWA sets out a framework for source protection planning on a watershed basis with Source Protection Areas established based on the watershed boundaries of Ontario's 36 Conservation Authorities. The Upper Thames River, Lower Thames Valley and St. Clair Region Conservation Authorities have entered into a partnership for The Thames-Sydenham Source Protection Region.

The Assessment Report for the Upper Thames watershed delineates three types of vulnerable areas: Wellhead Protection Areas, Highly Vulnerable Aquifers and Significant

Groundwater Recharge Areas. We wish to advise that the subject lands are identified as being within a vulnerable area. Mapping which shows these areas is available at: http://maps.thamesriver.on.ca/GVH_252/?viewer=tsrassessmentreport

Provincial Policy Statement (PPS, 2014)

Section 2.2.1 requires that: *“Planning authorities shall protect, improve or restore the quality and quantity of water by: e) implementing necessary restrictions on development and site alteration to:*

- 1. protect all municipal drinking water supplies and designated vulnerable areas; and*
- 2. protect, improve or restore vulnerable surface and ground water features, and their hydrological functions.”*

Section 2.2.2 requires that *“Development and site alteration shall be restricted in or near sensitive surface water features and sensitive ground water features such that these features and their related hydrologic functions will be protected, improved or restored.”*

Municipalities must be consistent with the Provincial Policy Statement when making decisions on land use planning and development.

Policies in the *Approved Source Protection Plan* may prohibit or restrict activities identified as posing a *significant threat* to drinking water. Municipalities may also have or be developing policies that apply to vulnerable areas when reviewing development applications. Proponents considering land use changes, site alteration or construction in these areas need to be aware of this possibility. The *Approved Source Protection Plan* is available at:

<http://www.sourcewaterprotection.on.ca/source-protection-plan/approved-source-protection-plan/>

RECOMMENDATION

The UTRCA has no objections to this application.

Conseil Scolaire Viamonde – November 15, 2016

Hi J,

The Conseil scolaire Viamonde (French public school board) has no comments regarding file OZ-8693.

Regards,

Vincent Lacoursière
Agent de Planification | Planning Officer
416-614-5910 | www.csviamonde.ca

2020 Circulation:

Housing Development Corporation – September 23, 2020

Hi Barb

I just took a look at the CMHC numbers for North London and they demonstrate that there are severe affordability challenges in this neighbourhood. 1 bedroom vacancy rates are shown to be 1.2% and average rental rates around \$1,100 per month. We know from experience that CMHC's numbers are typically better than what it is "on the ground". If you look at pad finder for example, you will have a hard time finding a 1 bedroom let alone a 1 bedroom for \$1,100 a month.

I hope this helps and we would welcome an opportunity to activate the Bonus. Let us know if York is interested.

Cheers and have a great rest of the day!

Brian

London Hydro – September 28, 2020

Servicing the above proposal should present no foreseeable problems. Any new and/or relocation of existing infrastructure will be at the applicant's expense, maintaining safe clearances 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.

Upper Thames River Conservation Authority – October 16, 2020

City of London – Development Services
P.O. Box 5035
London, Ontario N6A 4L9

Attention: Barb Debbert (via email)

Dear Ms. Debbert:

Re: Application to Amend the Official Plan and Zoning By-law - File No. OZ-8693
Applicant: College Avenue Lofts Inc. c/o York Developments
193 to 199 College Avenue, London, ON

The Upper Thames River Conservation Authority (UTRCA) has reviewed this application with regard for the policies in the *Environmental Planning Policy Manual for the Upper Thames River Conservation Authority (June 2006)*. These policies include regulations made pursuant to Section 28 of the *Conservation Authorities Act*, and are consistent with the natural hazard and natural heritage policies contained in the *Provincial Policy Statement (2020)*. The *Upper Thames River Source Protection Area Assessment Report* has also been reviewed in order to confirm whether these lands are located in a vulnerable area. The Drinking Water Source Protection information is being disclosed to the Municipality to assist them in fulfilling their decision making responsibilities under the *Planning Act*.

CONSERVATION AUTHORITIES ACT

The subject lands **are not** affected by any regulations (Ontario Regulation 157/06) made pursuant to Section 28 of the *Conservation Authorities Act*.

DRINKING WATER SOURCE PROTECTION: Clean Water Act

The subject lands have been reviewed to determine whether or not they fall within a vulnerable area (Wellhead Protection Area, Highly Vulnerable Aquifer, and Significant Groundwater Recharge Areas). Upon review, we can advise that the subject lands **are** within a vulnerable area. For policies, mapping and further information pertaining to drinking water source protection, please refer to the approved Source Protection Plan at:

<https://www.sourcewaterprotection.on.ca/approved-source-protection-plan/>

RECOMMENDATION

As indicated, the subject lands are not regulated by the UTRCA and a Section 28 permit application will not be required. The UTRCA has no objections to this application.

Urban Design Peer Review Panel – October 21, 2020

The Panel provides the following comments on the submission:

- The Panel commends the applicant for providing a contextually appropriate mid-rise design solution which addresses College Ave by managing the vehicular and pedestrian entrances, terracing of the entrance landscape, corner treatment, 6th floor setback and canopy feature, as well as the material selection and application.
- The Panel recommended further development of the building as follows:
 - Consideration for how the neighbourhood may evolve assuming adjacent properties will eventually be developed – i.e. rear condition to

neighbouring properties to the south if they were developed in a similar manner, condition along College Avenue if properties to the west were developed.

- Refine 6th floor setback and canopy to provide a consistent termination to the building.
- Shape rear of the building for best fit and transition from neighbouring properties to avoid overlook and privacy issues.
- Reconsider reducing size/number of east facing units to increase minimal setback currently provided from east property line – is this a desirable living condition?
- The Panel recommended further consideration of the pedestrian realm along College Ave, including how different terraces are intended to be used and balancing the active usable space vs landscaped space to ensure a desirable entry experience.

Concluding comments:

This UDPRP review is based on City planning and urban design policy, the submitted brief, and noted presentation. It is intended to inform the ongoing planning and design process. Subject to the comments and recommendations above, the proposed design is a well-considered solution for the site that could be elevated further by minor refinements to improve the living conditions for residents and relationship to neighbouring properties. The panel looks forward to the proponent's response.

Water Engineering – November 2, 2020

Hello,
Water Engineering does not oppose the application.

Water serving evaluations provided in the attached "Servicing Feasibility Study" may be insufficient. Additional evaluation may be required at the time of development application.

Regards,
Jeff

Heritage – November 18, 2020

Good Afternoon Barb,

OZ-8693 – 193-199 College Avenue six storey, 21 metre tall apartment building with 43 units

Major issues identified

The above subject property (including 193, 195, 197 and 199 College Ave) is LISTED on the City's Register of Cultural Heritage Resources.

- 193-195 College Ave (1917 – cottage vernacular) mirror images; likely built by R. G. Wilson & Son, contractor
- 197 College Ave (c1885 – side hall plan cottage)
- 199 College Ave (1914)

The subject property is also adjacent to 835 Richmond Street which is designated as an individual property under Part IV of the *Ontario Heritage Act*.

- 835 Richmond St (1907 – Edwardian) semi-circular front gable with finial; second storey projected bay with bracketed eave; turret on left side; tripartite windows on side gables; keystone over front window

As per/Policy 586 (*The London Plan*): "no development and site alteration shall be permitted on adjacent lands to heritage designated properties or properties listed on the Register except where the proposed development and site alteration has been evaluated and it has been demonstrated that the heritage attributes of the heritage designated properties or properties listed on the Register will be conserved."

Archaeological potential at the above subject property (all four addresses) is also identified on the City's 2018 Archaeological Mapping, and soil disturbance is anticipated due to proposed development.

Finally, the proposed development is predicated on the demolition of (4) individual buildings located on properties LISTED on the City's *Register*. Note that demolition of properties on the City's *Register* requires Council approval.

Heritage planning – complete application requirements

- Heritage Impact Assessment (HIA)
- Cultural Heritage Evaluation Report
 - The CHER should be a component of the HIA – and can be included within the HIA, as opposed to a separate report. The CHER should be submitted as supporting documentation with any demolition request.
- Archaeological Assessment Stage 1-2 – entire property

If an archaeological assessment has already been completed and received a compliance letter from the Ministry, the compliance letter along with the assessment report may be submitted for review to ensure they meet municipal requirements.

Notes

HIA

- This assessment should respond to information requirements in the Ministry's InfoSheet #5.
- Heritage Impact Assessments should be prepared by heritage planner, heritage consultant and or a member of the Canadian Association of Heritage Professionals (CAHP).
- Resumes of those involved in the preparation of the HIA should be included in the appendix.

CHER

- This evaluation should be based on 9/06 regulation criteria.
- The CHER should be prepared by heritage planner, heritage consultant and or a member of the Canadian Association of Heritage Professionals (CAHP).
- Resumes of those involved in the preparation of the CHER should be included in the appendix.

Archaeological Assessment

- The proponent shall retain a consultant archaeologist, licensed by the Ministry of Heritage, Sport, Tourism and Culture Industries under the provisions of the Ontario Heritage Act (R.S.O. 1990 as amended) to carry out a Stage 1-2 archaeological assessment on the entire property and follow through on recommendations to mitigate, through preservation or resource removal and documentation, adverse impacts to any significant archaeological resources found (Stages 3-4).
- The archaeological assessment must be completed in accordance with the most current Standards and Guidelines for Consulting Archaeologists, Ministry of Tourism, Culture and Sport.
- All archaeological assessment reports will to be submitted to the City of London once the Ministry of Heritage, Sport, Tourism and Culture Industries has accepted them into the Public Registry; both a hard copy and PDF format of archaeological reports should be submitted to Development Services.
- No soil disturbance arising from demolition, construction, or any other activity shall take place on the properties prior to Development Services receiving the Ministry of Heritage, Sport, Tourism and Culture Industries compliance letter indicating that all archaeological licensing and technical review requirements have been satisfied.
- It is an offence under Section 48 and 69 of the *Ontario Heritage Act* for any party other than a consultant archaeologist to make alterations to a known archaeological site or to remove any artifact or other physical evidence of past human use or activity from an archaeological site.
- Should previously undocumented (i.e. unknown or deeply buried) archaeological resources be discovered, they may be a new archaeological site and therefore be subject to Section 48(1) of the *Ontario Heritage Act*. The proponent or person

discovering the archaeological resources must cease alteration of the site immediately and engage a consultant archaeologist to carry out archaeological fieldwork, in compliance with Section 48(1) of the *Ontario Heritage Act*. Archaeological sites recommended for further archaeological fieldwork or protection remain subject to Section 48(1) of the *Ontario Heritage Act* and may not be altered, or have artifacts removed from them, except by a person holding an archaeological license.

- If human remains/or a grave site is discovered, the proponent or person discovering the human remains and/or grave site must cease alteration of the site immediately. The *Funerals, Burials and Cremation Services Act* requires that any person discovering human remains must immediately notify the police or coroner and the Registrar of Burial Sites, War Graves, Abandoned Cemeteries and Cemetery Closures, Ontario Ministry of Government and Consumer Services.

Heritage – September 16, 2021

Good Evening Barb,

I have reviewed the following heritage impact assessment (HIA) for general completeness only, and find the document insufficient to accept as a heritage component of a complete application for the College Avenue Residential Development (OZ-8693).

- MHBC Planning Ltd (2016, August 4). *Heritage Impact Assessment – College Avenue Residential Development*.

OVERVIEW—HERITAGE STATUS

The subject site at 193-199 College Avenue is completely surrounded by properties LISTED on the City's *Register of Cultural Heritage Resources* and flanked on one end by 835 Richmond Street, a Part IV designated property. (9) properties on the *Register* are impacted by the proposed development.

Note that the heritage context on, and adjacent to, the subject site has changed since 2016 when the proposal was initially submitted. The HIA does not respond to this new context in which the development is now being proposed. Additional properties were added to the City's *Register* as/per recommendation from the, *St George-Grosvenor, Heritage Conservation District Study* (2016). A section of the HIA should include an evaluation (using 9/06 criteria) of the following properties:

- 200 St. James St (1929 – apartments, Classical Revival) LISTED, 2007
- 202 St. James St (1882 – Italiante) LISTED, 2017
- 204 St. James St (1915 – Dutch Colonial) LISTED, 2007
- 189 College Ave (1931 – cottage, Georgian Revival) LISTED, 2007
- 193 College Ave (1917 – cottage, vernacular) LISTED, 2007
- 195 College Ave (1917 – cottage, vernacular) LISTED, 2007
- 197 College Ave (c1895 – cottage, SHP) LISTED, 2017
- 199 College Ave (1914) LISTED, 2017

Note that 835 Richmond Ave (1907 – Edwardian) is designated pursuant Part IV of the *Ontario Heritage Act* (designated, 1999)

The subject site is also located within the boundaries of a potential heritage conservation district (HCD) – the St George-Grosvenor Heritage Conservation District – which Council approved for the preparation of the HCD Plan document. Recognition of the broader context of the surrounds of the subject site should be part of the assessment and evaluation of impacts.

DEFICIENCIES

The following is a list of matters that were not adequately addressed in the HIA (and should be addressed) in a resubmitted HIA:

- the demolition of (4) contiguous LISTED properties; the impact is greater than the loss of just one adjacent building; the broader context is also impacted;

- evaluate the impact on the context with the demolition of (4) contiguous LISTED properties
- the HIA did not address issues of compatibility of new development within a well established and cohesive heritage area;
 - the HIA did not itemize impacts and provide a response; there are impacts on individual properties and impacts on collective/context area
- the subject site is located within the St George-Grosvenor Heritage Conservation District study area;
- the number of adjacencies and LISTED properties has expanded; specifically 197 and 199 are now LISTED on the City's *Register* which aren't addressed in HIA;
- the properties were not individually evaluated using the criteria of Regulation 9/06 to determine cultural heritage value or interest;
- adjacency issues, including compatibility, have not been addressed in HIA;
- the HIA notes that "commemoration of the history of these four properties on College Avenue would be required", however it is not clear what would be commemorated as the HIA found that the properties did not demonstrate CHVI;
- heritage planning staff does not have adequate information (as part of the HIA) on the impacted properties to render a recommendation on their futures status;
- O. Roy Moore, architect is important within the area and development would result in loss of buildings attributed to him;
- summary in the HIA of St. George HCD Study pre-dates the final report and does not reflect final conclusions;
- the HIA did not evaluate potential impacts of proposal on heritage attributes identified in the by-law for 835 Richmond St.; and,
- the HIA did not address construction related impacts (vibration, buffering, monitoring etc...) specific direction/details required as part of HIA given the proximity of construction to heritage resource which completely surround the subject site.

ADDITIONAL HERITAGE MATTERS

As well, note the following heritage matters related to this application:

- The application – with a newly prepared HIA – should be circulated to the LACH for review and commenting.
- Should a demolition request be received, Municipal Council must consent to the demolition (or designate under Part IV of the OHA) of the four heritage listed properties comprising the subject site. Cultural Heritage Evaluation Reports (CHER) for all impacted LISTED properties will be required as part of the Required Clearances for Demolition Permit.
- Archaeological potential on the subject site is identified on the City's Archaeological Mapping. An archaeological assessment stage 1-2 on the entire subject site is required as part a complete application.

Moving forward, heritage staff recommends that a newly prepared HIA be submitted to address the above heritage matters.

Urban Design – March 18, 2021

Urban Design staff reviewed the submitted site development concept and elevations for the zoning by-law amendment at the above noted address and provide the following urban design comments consistent with the Official Plan, applicable by-laws, guidelines, and guidance provided by the Urban Design Peer Review Panel (UDPRP);

- Consistent with comments provided by the UDPRP, the change to the zoning of the site should provide for a building design that is compatible with its context and appropriate for the size of the site;
 - Include appropriate setback for the building from the rear and side yards where units are facing into those yards in order to provide for adequate access to sunlight and privacy for adjacent properties;
 - The inclusion of appropriately sized and safe pedestrian connections between the proposed building and the City sidewalks along the adjacent street frontages;

- Clad the building in materials and colours found within the neighborhood (Recommended Great Talbot HCD area).
- Design the ground floor units located along the College Avenue frontage to include individual access to the street, the proposed patios should be treated as front porches in order to animate the street edge.
- Provide for an adequately sized common outdoor amenity area on the site.

We look forward to working with the applicant through the rezoning to refine the design of the building and site.

Transportation – December 10, 2021

Hi Paul,

The TIA is currently outdated as per the Transportation Impact Assessment Guidelines, Functional Life of TIA which is 3 years. However traffic generated by this site is very low and it shouldn't have any major impact in the traffic conditions.

There is no need to update this TIA as the traffic generated doesn't warranted this request at that time.

Appendix D – Public Engagement

2016 Circulation:

November 21, 2016

Mr. Justin Adema,
The City of London, Planning Services 206 Dundas St.
London, ON N6A 4L9

RE: File OZ-8693 (193 - 199 College Avenue)

Dear Mr. Adema,

Thank you for meeting with Gary Wilson and myself on November 18, 2016.
We met with Ali Soufan and Carol Wiebe on November 9, 2016 regarding this file.

Following are our comments:

Roadway

We suggest that College Ave. be changed to a one way street running from west to east.

While one way streets may not follow current urban planning theory, in this instance a one way street makes eminent practical sense.

The existing road is very narrow at approximately 8.5 m. With parking on the north side there is not enough width for unimpeded two way traffic. Neither the road allowance nor the existing nor proposed buildings allow for road widening. As the residential nature of the street will be increased if this project goes ahead, street parking is necessary. The street is one block in length and with west to east traffic flow there will be no impeding of traffic on Richmond St. Richmond is already busy and will become more so in the future.

Urban planning theory may say that one way streets encourage increased traffic speed but as College Ave. is one block in length and does not lead to any popular destination we do not see traffic speed or volume as becoming issues.

We ask that you discuss this proposal with the builder as we think that the builder will support it.

We also ask that we be informed of any comments or decisions made by the Transportation Planning Department regarding this issue.

Bonusing

It has been difficult to determine exactly what is involved in the proposed bonusing for this development. It would seem that, in return for some amenities such as a foyer, the choice of building cladding and underground parking, the builder is asking for re-zoning and extra height.

We suggest that the amenities and parking are not at all optional. There is no possibility of providing adequate surface parking given the lot size and proposed number of units. Neither are the other amenities optional for units being sold at the price points the builder has in mind.

This means that the builder is asking for bonuses without any concessions.

Given the imbalance between builder concessions and City bonuses, we ask that the bonuses be refused.

Zoning change

We understand that the builder is requesting a re-zoning from r-2, with a maximum height of 9.5 m., to R-10, which can go much higher. This is not consistent with either the existing Official Plan or the proposed London Plan. Please refer to the citation below.

Density

The existing buildings are Low Density Residential. The existing Official Plan is very clear about what is allowed in the St. George/Grosvenor Neighbourhood.

Section 3.5.3. states:

" Lands within the St. George/Grosvenor Neighbourhood, bounded by Waterloo Street on the east, Oxford Street on the south, the Thames River on the west, and Victoria Street on the north, will remain a predominantly low density, low-rise residential area despite continual redevelopment pressure for apartment buildings, expansions to existing hospitals, and office conversions.

While there are portions of this neighbourhood that are appropriate for redevelopment or conversion, there also exists a viable low density, low-rise residential neighbourhood. The Plan does not anticipate significant land use changes in these areas, and any proposals for development shall not adversely impact the amenities and character of the surrounding area.

Area-specific zoning regulations such as floor area ratio, maximum dwelling size and onsite parking limitations will be applied in parts of the neighbourhood that may be affected by residential intensification and infill to ensure that future development is not out of scale and character with the existing residential community.

Based on the St. George/Grosvenor Secondary Plan, suitable areas for office conversions and medium and high density residential land uses have been identified in this Plan. It is intended that additional areas will not be designated for these uses without a re-evaluation of the Secondary Plan and a subsequent decision by Council to amend the Official Plan.

(OPA 341 OMB Order No. 0780 March 15, 2006)"

The proposed density is over 200 units per hectare, which is clearly not consistent with this policy and will be out of scale and character with the existing residential community.

Height

The vast majority of the buildings on the block of the proposed development are low density residential of 1 to 2 ½ storeys in height. The tallest building on the block is a Heritage-designated apartment building which is 4 storeys in height.

The proposed building height is 6 storeys, which is clearly out of scale and character with the existing residential community.

We suggest that if the City approves some version of this proposal that the height of the proposed building be limited to 4 storeys at the very most. Please refer to the previously cited section of the Official Plan.

Thank you for considering our recommendations.

Gary Wilson

Alasdair Beaton

From: Dianne Cunningham

Sent: Tuesday, November 15, 2016 12:04 PM

To: Adema, Justin; philsquire@london.ca

Subject: Re:FILE OZ-8693 (193 - 199) College Avenue) Mr Justin Adema, The City of London, Planning Services POBox 5035, 206 Dundas St. London ON N6A 4L9

I am writing to comment on the Possible Amendment to change the Official Plan land use designation FROM Low Density Residential TO Multi Family, Medium Density Residential. The Zoning By-Law amendment is to permit the development of a six story, 21 metre tall apartment building containing 43 units. The location is 4 homes at 193-199 College Avenue. They have been occupied during the 29 years that I have lived in my home at.

There is a historical lane that backs onto my garden. My fence with an adjoining gate allowed for Neighbours to visit and chat. I replaced the fence this spring because of damage by the snow plough over the winter. A few years ago the trees on the fence line were chainsawed down on Christmas eve, gravel was spread over the entire back yards and lane way, and signs were put up on my fence for illegal parking spots! All of this with no communication from the owner, then or since.

We live in a wonderful community of friends and neighbours who take pride in their homes, enjoy the amenities of living downtown, raise or have raised their families, volunteer their time to support charities, take care of elderly neighbours, update our homes and at the same time work to maintain the character, history and heritage of the homes on the streets where we live. My home turned 115 years old this year.

I hope others will enjoy the quality of life that exists in our neighbourhood in years to come. I hope that the good planning of the past will continue into the future. We are grateful for those former City Councils and Planners for their vision. I am so thankful for the individuals and community associations who continue to participate in endeavours to preserve and enhance our London neighbourhoods.

I strongly support the letter that was sent by Kevin Langs, the President of our St George Grosvenor Neighbourhood Association. Kevin made us aware of previous work done that allow us to present a fair and knowledgeable description of why we are opposed to an Official Plan amendment and Zoning By-Law amendment: The Draft London Plan, the Near Campus Neighbourhoods Planning documents, the SGG Heritage Conservation District study area work as well as the Architectural Conservancy Ontario - London Region's 43rd Annual Geranium Heritage House Tour on June 5th and the collaborative work being done by Western University, Department of History with students involved in an Oral History of the SGG-Piccadilly Neighbourhood. I could go on - we have pride in our neighbourhood and our City of London now, and hopefully into the future as we continue to honour our past!

The Reasons I Do Not Support this NOTICE OF APPLICATION:

. I do not look forward to going out to my back garden and looking up at a six-story, 43 unit apartment building development located just 4 m from my back fence. Sunshine?, shadows, noise, concrete, lack of privacy, lack of breezes, lack of trees and birds, fencing challenges, parking for guests, just simply too crowded!

. I now look at a very large hospital but it is buffered by the row of lovely heritage cottages that could be demolished someday. The large trees were chainsawed down, so the hospital is more exposed than it used to be. I am shocked at the suggestion of a huge high rise building in the middle of an established low-rise residential block of historical houses on a Narrow One Block Street!

. We have parking challenges now in a hospital setting with family health centres and a health research centre. Parking challenges also exist on St. James Street, especially in the winter when we experience daily blockages with cars travelling in different directions on the single lane that occurs due to snow. Simply dangerous! All of this bordering on the busy Richmond Street traffic!

. The design and size of the building may be admirable to some. It simply does not suit the character of our neighbourhood .

. This would be precedent setting for future development in London.

I have been very fortunate to have neighbours who are committed to caring for their properties and who are proud to live in this beautiful heritage district of the St. George/Grosvenor Neighbourhood. We are confident that our homes will be there for other families in the future. The Official Plan " ...does not anticipate significant land use changes in this area, and any proposals for development shall not adversely impact the amenities and character of the surrounding area." We are living up to the every day challenges of maintaining and enhancing our homes as well as responding to the intensification and parking challenges that have occurred. We trust that the Planning staff and our elected representatives will honour the land use designations as described in the City of London's Official Plan.

Thank you.

Dianne Cunningham

November 10, 2016
Mr. Justin Adema,
The City of London, Planning Services PO Box 5035, 206 Dundas St.
London, ON N6A 4L9

DELIVERED VIA EMAIL

Dear Mr. Adema

RE: File OZ-8693 (193 - 199 College Avenue)

The St George Grosvenor Neighbourhood Association (SGGNA) is opposed to an Official Plan amendment and Zoning By-law change contemplated in the application OZ-8693 for the properties at 193-199 College Ave. The land use as described in the Official Plan and the zoning for these properties and the surrounding residential area has succeeded for years to encourage compact, urban development, a thriving community and protection for the natural and architectural heritage resources in the neighbourhood. The changes proposed in this application, are entirely inconsistent with the residential character and scale of the streetscape on this street and surrounding streets. Approving this application and subsequently approving a six-storey, 43 unit apartment building development in the middle of an established low-rise residential block of historical houses, on a narrow one block street runs counter to the principles of good planning and the manner in which development is encouraged through the Official Plan, the Proposed London Plan, the vision of the Near Campus Neighbourhoods Policy and recommendations from the St George Grosvenor Neighbourhood Heritage Conservation District Study. It would set a dangerous precedent for future development in all areas of the City, not just for this neighbourhood.

The properties are currently zoned to allow for a suitably dense and flexible form of housing including single detached, semi-detached, duplex, or converted dwelling on each lot. The change in land use designation to Multi-family, Medium Density Residential does not suit these lots. As described in the Official Plan (Chapter 3 - Residential Land Use Designations) Multi-family, Medium Density Residential zone does not envision the type of high-rise, high-density that the Developer ultimately plans for this site. The proposed development is not sympathetic to neighbouring heritage properties and architectural styles, increases the vehicular traffic load on an already narrow, crowded one-block street, and provides no buffer whatsoever between the high-rise development and the low-rise detached houses immediately to the west, east and south of the site.

The Official Plan very clearly defines the areas within in this neighbourhood where medium density residential development is appropriate. Specifically, in Chapter 3 section 3.5.3 St. George/Grosvenor Neighbourhood, the Official Plan states that lands "will remain a predominantly low density, low-rise residential area" and "The Plan does not anticipate significant land use changes in this area, and any proposals for development shall not adversely impact the amenities and character of the surrounding area." Furthermore, the Plan specifies that Multi-family, Medium Density Residential will be permitted on the north side of St James St between St George St and the Thames River, which of course does not include College Ave. To permit a high-rise development of this nature in the middle of the block will absolutely adversely impact the amenities and character of the surrounding area.

The draft London Plan, which will become the new official planning document once passed by Council, maintains the same land use for the St George Grosvenor Neighbourhood and re-affirms as to where more dense forms of residential development is permitted. The London Plan does not recommend highrise, Multi-family, Medium Density residential development in the middle of the block on College Ave, a Neighbourhood Street.. The Official plan, the draft London Plan and the Near Campus

Neighbourhoods planning documents recognize the intensification that has occurred in this neighbourhood and the development pressure that continues. These planning documents are very purposefully designed to prevent the type of over-intensification that would result from the proposed development on this site.

The properties on College Ave are within the study area of the St George Grosvenor Heritage Conservation District. Permitting this Official Plan amendment, zoning change and subsequent high-rise development is not preserving the consistency of architectural heritage and streetscape within the proposed Heritage Conservation District. The one-storey Ontario cottages at 193 and 195 College Ave are listed as a Priority 3 under the City's Inventory of Heritage Resources, indicating that together these properties are part of an architecturally significant, complementary and consistent streetscape. Not only would the existing houses that contribute to the heritage streetscape be lost, but also the properties of architectural heritage significance to the east, west and south would be negatively impacted.

To the west: 189 College Ave is listed under the City's Inventory of Heritage Resources, Priority 1

To the east: 835 Richmond St is Designated under Part IV of the Ontario Heritage Act

To the south:

200 St James St listed under the City's Inventory of Heritage Resources, Priority 1

204 St James St listed under the City's Inventory of Heritage Resources, Priority 1

206 St James St listed under the City's Inventory of Heritage Resources, Priority 2.

A six-storey development on this site would tower over these neighbouring listed properties. 189 College Ave is a historically and architecturally significant house, built as the personal residence for O. Roy Moore, a leading local architect of the early 20th century whose designs are prominent throughout London and southwestern Ontario. The proposed six-storey building would in effect, leave 189 College Ave completely isolated on the street. The shadow cast by the proposed high-rise would completely block out the morning sun further blighting 189 College Ave.

The actual area of these properties cannot support a high-rise structure. It's nearly impossible to see how the proposed building could fit with 5 m front yard setback 4 m back yard setback and 45% lot coverage, especially given that there is a historical public lane behind these houses. The lane is likely currently indistinguishable given that the entire rear yards have been gravelled in recent years; however it is a lane that provides vehicular access to the parking at the rear of these properties. In fact, the proposed building site is so crammed that the drawing included with this application inaccurately depicts an existing garage at the rear of 200 St. James St. as "Parking". In the southwest corner of the lot, an area that is drawn as landscaping, walkway and perhaps part of the proposed underground parking structure overlaps the existing garage at the rear of 200 St James St. Has this been addressed by the developer and

the property owner of 200 St James St? How will this be resolved? The buildings on 193 -199 are in good condition and have been rented as residential units over the last number of years. Recently, perhaps through willful neglect of the buildings and through the removal of rear yard landscaping and the gravelling of rear yards for car. parking, the residential character and amenities have been altered, but not irreparably lost. Alternatively, the current zoning permits suitable replacement development on these lots that would result in a desirable level of intensification and buildings that are compatible with the character and scale of the surrounding residential neighbourhood.

College Ave is a narrow, one-block neighbourhood street, running between Richmond St and St George St. The street cannot support increased vehicular traffic associated with a dense, high-rise development. Access to and from College Ave via Richmond St or St George St is already difficult with traffic flows. The parking lot entrance and loading dock for Mount Hope is on College Ave. Truck deliveries to this facility frequently impede traffic and the metered on-street parking on the north side of College Ave effectively make the street even narrower.

It's extremely difficult to imagine how a development of this size would fit and function within this area. Nor is it desirable to have a six-storey development looming over the designated and listed properties that it borders, within a proposed heritage conservation district, severely degrading the amenities and character of the surrounding area. For these reasons, the application for an Official Plan amendment and zoning change to allow for the proposed apartment development must not be approved.

Sincerely,

Kevin Langs President,
St George Grosvenor Neighbourhood Association

Mr. Justin Adenia,
The City of London, Planning Services
PO Box 5035
300 Dufferin Avenue.
London, ON N6A 4L9

Dear Mr. Adema

RE: File OZ-8693 (193 -199 College Avenue)

The proposed Official Plan amendment and zoning change to permit a high-rise apartment building development at the above noted addresses is neither compatible nor desirable in this low-rise residential neighbourhood.

The current zoning of these properties is consistent with existing residential lots in the areas surrounding these properties. Furthermore, section 3.5.3 of the *Official* Plan prescribes that lands within the St. George/Grosvenor Neighbourhood, bounded by Waterloo Street on the east, Oxford Street on the south, the Thames River on the west

and Victoria Street on the north, will remain a predominantly low density, low-rise residential area despite continual redevelopment pressure for higher density projects.

The Official Plan does not anticipate significant land use changes in these areas, and any proposals for development shall not adversely impact the amenities and character of the surrounding area.

Moreover, the increased vehicular traffic associated with such development will intensify the already overburdened capacity of secondary collector roads and local streets within this neighbourhood;

I respectfully submit that the amendment and zoning changes proposed by the applicant, MHBC Planning Ltd., manifestly conflict with the intent of the Official Plan and that they must be denied by Council.

Sincerely,

Ken Owen

From: jackie farquhar
Sent: Tuesday, November 08, 2016 6:45 PM
To: Adema, Justin
Subject: York Developments Proposal

Re: File OZ--8693 - (193-199 College Avenue)

I am a resident of St. George Street and a member of the local neighbourhood association. I would like to go on record that I am strongly opposed to the change from Residential zoning to Multi family medium density to facilitate the building of a 45 unit condo complex proposed by York Developments..

I understand the City of London is moving towards intensifying the core BUT this should be undertaken with care and consideration for the residential and historic aspects of a neighbourhood. Such a large building is totally site insensitive.

The section of St. George Grosvenor Neighbourhood Association encompassing these properties is presently included in a recommended Heritage Conservation District study that the City will soon be considering - the consultant's report has been completed. The York Development condo proposal is NOT in keeping with the heritage nature of this area.

College St. is one block long and is extremely narrow, with parking on the north side - it is NOT compatible with a large 6 storey, 45 unit complex. This small street will not withstand the added traffic such a building will incur. Also trucks servicing Marion Villa and St. Mary's add major vehicles to this small street.

Thank you for noting my comments and passing along. Jackie Farquhar

2020 Circulation:

From: Alasdair Beaton
Sent: Tuesday, October 13, 2020 7:05 PM
To: Debbert, Barb <bdebbert@London.ca>; Gary Wilson
Subject: [EXTERNAL] re: Planning File OZ-8693 , 193-199 College Ave.

Dear Ms. Bebbert,

Following are our comments on this File, which you have requested by Oct. 14.

We oppose the application as it is presented for the following reasons:

- College Ave. is a very narrow 2-way street (about 8 metres, if memory serves) with street parking on the North side. Also on the North side is a large health care facility with no on-site parking for staff or families. Semi-trailers make daily deliveries.
- 43 units are proposed with layby parking shown for 3 vehicles. There will be increased traffic and increased demand for on-street parking.
- There are no details in the Application regarding what is being provided by the developer to justify bonusing.
- The images in the Application all state that they are subject to change. It is impossible to give a detailed response to a proposal which is in flux.

Thank you for giving our comments your attention and please keep us apprised of any progress on this File.

Sincerely,

Alasdair Beaton

and

Gary Wilson

From: Dianne Cunningham
Sent: Wednesday, October 14, 2020 4:29 PM
To: Debbert, Barb <bdebbert@London.ca>
Subject: [EXTERNAL] Fw: York Development Application - College Avenue Lofts or Six Storey Boutique Condominium? - Official Plan Ammendment

From: Dianne Cunningham
Sent: Wednesday, October 14, 2020 4:26 PM

To:

Subject: York Development Application - College Avenue Lofts or Six Storey Boutique Condominium? - Official Plan Amendment

Good Afternoon Ken - I'm sending this note to thank you for the work you are doing in response to the City of London on behalf of SGGNA as we make comments regarding the York Development Application to the 1989 Official Plan and Zoning By-law Amendment in our Neighbourhood. I was interested to note that during the City's ongoing planning review and decision making process "that this application is being circulated during the State of Emergency issued by the Province of Ontario". These are very challenging times and I find it difficult to be involved. I'm in Toronto most days caring for my very ill daughter.

My home is at and my backgarden fence could be up against a 6 storey - 43 unit building. I made comments to the City in the last round and will add my main concern since. The College Avenue area being considered for development is in a Hospital Zone - usually respected in other cities and towns in Ontario to be a quiet area with slow speed limits.

The narrow and short Collage Ave street has a few assigned parking spots. There is a very large Parking Garage at the College Ave and St George St Driveway Entry to another Long Term Health Care facility. Delivery trucks load and unload. Health care workers have personal underground parking spaces - busy day and night. The curbside at the entrance to the hospital has a high concrete slab serving as an outside space for inpatients in wheel chairs, a fresh air and/or smoking area. The street portion remaining serves drop off health care staff and visitors. Other vehicles pick up staff before and at the end of their shifts 3 times a day. Can you imagine this Hospital Zone transportation area safely serving a small footage of Collage Ave with a 43 unit building that now serves 3 small cottages and a hospital entrance, Delivery truck load area and underground parking garage entrance?

This is what I have observed over the past couple of years, especially as I walk my dog and visit patients Ken. I am so disappointed in York Developments. They heard our suggestions loud and clear. A lovely building! An inappropriate site! Since then we have a huge residential development approved on St James St. at the Thames River. So much for the FOREST CITY!

We all appreciate your wonderful leadership and commitment. Thank you Ken. Sincerely, Dianne Cunningham

October 2, 2020

City of London Development Services
Attn: Barb Debbert

300 Dufferin Avenue, 6th Floor
London, Ontario N6A 4L9

Dear Ms. Debbert:

RE: Notice of Planning Application; Your File #0Z-8693

I acknowledge receipt of the Notice of Planning Application relative to your file. I acknowledge that with the current state of emergency, in-person services are not available at this time. Accordingly the following is submitted in respect to the subject application;

1. The application is not in keeping with the current block uses. The block is bounded by College on the North, Saint James on the South, Richmond on the East and Saint George on the West. The block clearly exhibits mixed residential uses with some other uses, but certainly consisted with the Official plan and current zoning by-law. It is acknowledged that there are mixed high-rises uses in adjoining blocks (e.g. St Mary's Hospital, Governor Gate Apartments). The proposed development far exceeds anything contemplated by the planners.
2. The use being proposed would take the subject property from low density residential to multi-family medium density residential. The term medium is, in the submission of this writer, misleading, as the density would not be medium. There are currently four units located on the property and if one were to allow four persons per unit, that would allow for a maximum of 16 individuals. The proposal to 43 units would take the density to 172 persons, at 4 per unit. The requested zoning references 200 units per acre.
3. The width of College Street is not a normal street width, yet the building renderings shown in the application give a misleading prospective of the proposed development. I'm sure the city is aware of the width of College Street and the unlikelihood that it could be widened. Even if parking which is currently metered, was deleted from the street in its entirety, the street is simply not wide enough to realistically absorb the increased traffic caused by the proposed development.
4. The service entrance for St. Mary's Hospital runs off of College Street. Currently, there is constant truck traffic delivering needed service supplies to St. Mary's Hospital. Incremental traffic, on College Street, which is already physically challenged due to its narrow scope, could create numerous problems for St. Mary's Hospital. In addition to the increased traffic from the proposed development, turning North or South onto Richmond Street or North or South onto Saint George, serves to create further traffic congestion in an area which already suffers from traffic congestions.

There are numerous additional reasons why this proposed development is not in keeping with the best interests of this neighbourhood. There are alternative developments such as "Brown Stones" and other similar residential buildings, which would be much more compliant with the best interest of development in this neighbourhood in the city of London.

Yours very; truly,

Gary D. Wilson

From: jackie farquhar
Sent: Wednesday, October 14, 2020 11:25 AM
To: Debbert, Barb <bdebbert@London.ca>
Subject: [EXTERNAL] File: OZ-8693 Applicant: College Avenue Lofts Inc. (c/o York Devt's)

Good Morning Ms Debbert:
I am a resident of North London and live on St. George Street. My husband and I are distressed by the re-application by York Developments to change the zoning to enable development of an unacceptably large apartment complex on College Avenue.

This project was originally brought to our attention 4 years ago when York was planning such a development and at a meeting of residents in March 2016,, it was obvious that the local residents were highly critical of such a development on a very small street. Four years have elapsed since the original application and we had hoped that York had second thoughts and would be considering a more "ite sensitive" single family development for that site.

Unfortunately that is not the case. Please register our strong objection to the development proposed by York. Thank you.

Jackie Farquhar

October 10, 2020

Delivered by email

The City of London
Development Services
PO Box 5035
300 Dufferin Avenue
London, Ontario
N6A 4L9

Attention: Barb Debbert, Senior Planner

**Re: File: OZ-8693 – Official Plan and Zoning By-law Amendments – 193-199
College Avenue**

Dear Ms. Debbert

The geographic boundaries of the St. George Grosvenor Neighbourhood Association (SSGNA) are Victoria Street to the north, Waterloo Street to the east, Oxford Street to the south and the Thames River to the west. Since the Association's inception in 1980 we have recognized the importance of controlled development within the fabric of our community. We have, and will continue to contribute positively to appropriate and sustainable development that recognizes and complies with the current zoning by-laws as well as clause 3.5.3 of the Official Plan and clauses 1018 to 1024 of the London Plan that specifically addresses lands in the St. George Grosvenor Neighbourhood.

Of the more than 600 properties within our boundaries we have a membership of more than 120 households and on behalf of the Association and its membership I respectfully submit the following comments regarding the above noted file.

Both the Official and London Plans contain specific policies relating to lands within the St. George/Grosvenor Neighbourhood and Near Campus Neighbourhoods including:

1. That the neighbourhood will remain a predominantly low density, low-rise residential area despite continual redevelopment pressure for apartment buildings, expansions to existing hospitals and office conversions.

2. Where viable low density, low-rise residential neighbourhoods exist proposals for development shall not adversely impact the amenities and character of the surrounding area and ensure that any future development is not out of scale and character with the existing residential community.
3. That suitable areas for office conversions and medium and high-rise apartment land uses have been identified in these Plans and that additional areas will not be designated for these uses.
4. If additional areas are proposed for higher density forms of housing they are to be approached in a coordinated and comprehensive fashion rather than on a site specific basis.
5. Prohibiting built forms which are not consistent in scale and character with the neighbourhood, streetscape and surrounding buildings.
6. Ensuring that intensification projects contribute to the aesthetic quality of neighbourhoods and are appropriately located in medium or high density designated locations rather than areas designated low density residential.

The applicant has included in its application statements and opinions suggesting that these specific policies should no longer be considered applicable to this location. The following abridged statements of planning merits in the applicant's submission are supplemented with our response noted in italics:

- This development will broaden the housing choice in an established community of predominately single detached residences.

Established Policies for this neighbourhood state that:

- *The neighbourhood will remain predominately low density, low rise.*
- *Suitable areas for higher density forms of housing are already established and new areas will not be designated for these uses.*
- *Proposed intensification developments will not be evaluated on a site specific basis.*

A "broadened housing choice" in this proposal will not address the City's housing dilemma. This project, advertised as "coming soon" on the developer's web site, describes it as "condominium lofts in a coveted location" – not necessarily a broadened choice for many.

- The property is well suited to this development considering its proximity to the proposed rapid transit system and a designation supporting intensification would be appropriate.

The rapid transit system approved by Council does not include a north leg corridor on Richmond Street and proximity claims in support of their application are not applicable.

- The massing, orientation and articulation of the apartment building integrate effectively with and is sensitive to surrounding single detached dwellings.

The massing of the proposed building is bulky and intrusive on a small street with a 60' wide road allowance particularly as it is opposed to an existing 6 storey institutional structure.

Its scale and setbacks also negatively impact the neighbouring heritage buildings.

The applicant also references residential intensification projects recently approved in the general vicinity of this site ostensibly to garner support for approval of their application. Of the five locations referenced:

- Three are located between 3.6 and 5 kilometres distant from College Avenue and would not be considered to be "in the general vicinity" of the subject property.
- Two are located on either an arterial traffic route or primary and secondary collector routes which differ significantly from College Avenue which is designated a neighbourhood street.

- Two are located within areas of existing R5 medium density residential designations and two are within existing mixed use R3/OC2&4 residential and offices in existing dwellings – designations that only prevail on the Richmond and Oxford Street corridors in the neighbourhood of the subject properties.

We oppose consideration of these projects as being supportive or precedent setting for approval of the applicant's submission.

Notwithstanding the applicants claim to have addressed community concerns following a March 30, 2016 meeting regarding this project their acknowledged site specific nature of this application, potential land use conflicts with adjacent lands and its suggestion that it is precedent setting for similar neighbourhood development proposals supports the opposition of the St. George Grosvenor Neighbourhood Association to this project.

We appreciate the opportunity to provide comments regarding the proposed Official Plan and Zoning By-law amendments and trust that they will receive your due consideration and inclusion in Development Services recommendation report to the City's Planning and Environment Committee.

Thank you for your consideration,

Sincerely

Ken Owen

President, St. George Grosvenor Neighbourhood Association

Copies: Councillor Phil Squire

Executive Committee, St. George Grosvenor Neighbourhood Association

From: Steve Tanton

Sent: Wednesday, October 14, 2020 12:15 PM

To: Debbert, Barb <bdebbert@London.ca>

Subject: [EXTERNAL] Re: OZ-8693 - 193 - 199 College Avenue

Hi Barb, thank you for the confirmation. Our reasons for this objection is it would leave our home isolated. We would be the only home left on the street. We don't feel this is fair. Being a priority one heritage designated home, we feel the neighbourhood should remain At the same density as present.

Regards

Steve and Marianne Tanton

Steve Tanton

Broker

Oliver and Associates Real Estate Inc.

From: Z Z

Sent: Wednesday, October 14, 2020 9:29 PM

To: Debbert, Barb <bdebbert@London.ca>

Subject: [EXTERNAL] Input on 193-199 College Ave - Official Plan amendment & zoning amendment application

Hello

Related to the subject mention above I would like to voice my opposition to this development for a number of reasons.

Almost exactly the same proposal was rejected by the City of London in 2016/2017 as not fit for the location and neighbouring environment. I based my property purchase (i.e. right behind the proposed building) on the City's decision and believing such decision can not be reversed. Now this proposal is again on the table despite the fact

that none of the reason for the original rejection have changed. I do not think this is fair to the neighbouring properties, which will suffer serious value degradations if this proposal goes through.

Furthermore, the proposed building simply does not fit the available space. Three small residential houses will be replaced by 21 meters high building, which will be towering neighbouring residential properties and will be only meters away from a hospital. Right now the total population of College street is around 25 or so, considering a number and sizes of the houses. The new building with 43 units would bring at least 100 new residents. This is about 4 times more residents on a very small space. We would go from low density to the one that is comparable with downtown Toronto. The proposal is misleading in that sense, as it calls for a change from low density to a medium density development. Increasing the area population on College street by 4 times is definitely not a medium density development.

The proposal is also lacking details on how this development would affect the neighbouring houses both on College street St George street and St James street. Basically, this building will be towering the neighbourhood and I will have about 100 people staring right into my house. The proposal is also not addressing a question of parking. The development would bring about 50 additional cars to College street. Where would all these cars be parked and how will the traffic look like on a very narrow street, which is quite often used by emergency vehicles due to the hospital. The proposal also lack details on how the construction would be handled. I really have troubles imagining how all heavy trucks and machinery could operate on such a small space and on a very narrow street. The building would also need a huge crane to be erected in order to make construction possible. Operation of such crane in this environment is simply dangerous to neighbouring properties and to the residents, as this crane would operate virtually above their heads. Along with heavy machinery and huge trucks this construction would represent a serious safety concern for our neighbourhood. Patients in the hospital would also be endangered by noise, dust and huge traffic increase.

I realize that the new plan for London calls for developments within the city and modest increase in population density. However, when this plan was created it did not foresee destruction and degradation of one of the nicest neighbourhoods in the city. The proposal would simply change the character of the neighbourhood and force the remaining residents on College street, St George street and St James street to move out and sell their residential houses to developers to build more buildings. I do not believe this is the direction the current city council would like to take. There are many other areas in the city that would hugely benefit from such a development.

Lastly, we are in the midst of COVID 19 epidemic. Lots of people are concerned with their health and try to avoid any contacts that are not necessary. Considering this I wonder how would public meetings related to this development take place, as the province of Ontario mandated a maximum number of people in gathering indoors to 10. I am sure there is more than 10 of us who oppose this proposal and would like to participate in any public discussion meetings that will be taking place. The current situation makes this impossible and I believe it is not fair to discuss such radical proposal without significant face to face public input.

I hope this proposal will be rejected again and will never come back in any similar shape or form.

Best Regards

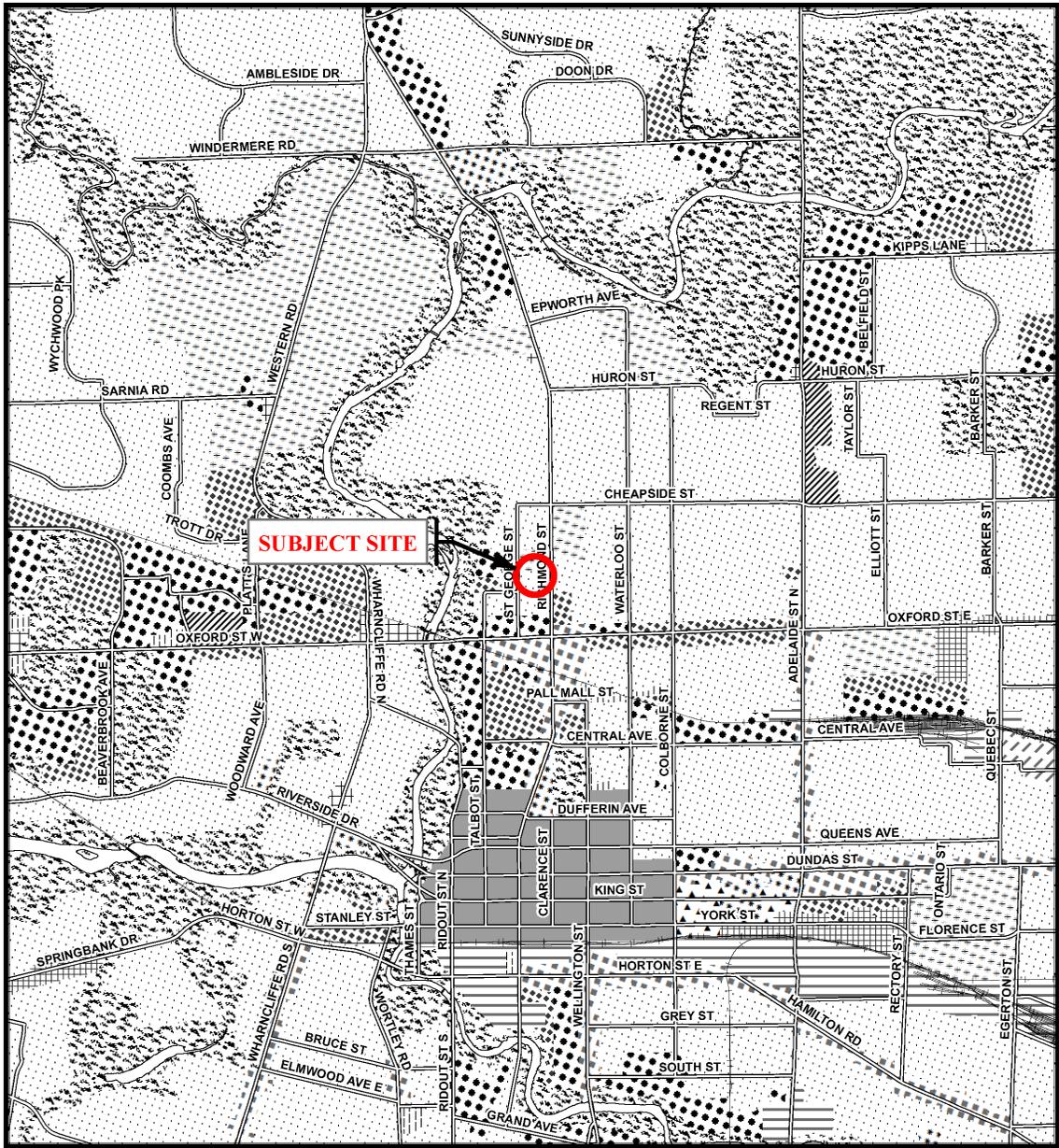
Zeljko Knezevic

Appendix E – Relevant Background

3.7 Planning Impact Analysis	
Criteria	Response
Compatibility of proposed uses with surrounding land uses, and the likely impact of the proposed development on present and future land uses in the area;	The proposed land use is not contemplated in the current Low Density Residential designation. The use is contemplated in the proposed MFMDR designation, however it exceeds the contemplated scale and density which is likely to present impacts on present and future land uses in the area, including the existing low density residential neighbourhood and adjacent heritage buildings.
The size and shape of the parcel of land on which a proposal is to be located, and the ability of the site to accommodate the intensity of the proposed use;	The site is of an adequate size and shape to accommodate higher densities. However, the proposed intensity results in reduced front, interior side, and rear yard setbacks which is indicative of over-intensification.
The supply of vacant land in the area which is already designated and/or zoned for the proposed use;	Lands to the west of the site on St. George Street (301 St. George Street and 124-150 St. James Street) contain accessory parking lots but are largely vacant. These lands are currently zoned a Residential R9 (R9-7*H45) Zone and a Residential R8 (R8-4) Zone.
The proximity of any proposal for medium or high density residential development to public open space and recreational facilities, community facilities, and transit services, and the adequacy of these facilities and services;	The site is within proximity to Doidge Park and Gibbons Park. Transit services are available by way of existing bus stops along Richmond Street and Oxford Street.
The need for affordable housing in the area, and in the City as a whole, as determined by the policies of Chapter 12 – Housing;	Municipal Housing expressed interest in securing affordable housing through the requested bonus zone. However, bonusing has since been removed from the Planning Act, therefore there is no legal tool to secure affordable housing.
The height, location and spacing of any buildings in the proposed development, and any potential impacts on surrounding land uses;	Staff have major concerns with the height of the proposed building, as limited setbacks and no enhanced setbacks are proposed to mitigate impacts of the proposed building height on the adjacent heritage buildings and low-rise residential neighbourhood.
The extent to which the proposed development provides for the retention of any desirable vegetation or natural features that contribute to the visual	The proposed development provides very little space on site for landscaping and screening. The requested side yard setbacks are insufficient to accommodate

<p>character of the surrounding area;</p>	<p>plantings and meaningful buffers. Some tree planting may be achievable along the south property between the proposed building and neighbouring properties.</p>
<p>The location of vehicular access points and their compliance with the City's road access policies and Site Plan Control By-law, and the likely impact of traffic generated by the proposal on City streets, on pedestrian and vehicular safety, and on surrounding properties;</p>	<p>Vehicular access is proposed from College Avenue, a local street. A Transportation Impact Assessment (TIA) was provided as part of the application submission. No concerns were raised regarding the access location by Transportation staff. The TIA was accepted and no further comments provided.</p>
<p>The exterior design in terms of the bulk, scale, and layout of buildings, and the integration of these uses with present and future land uses in the area;</p>	<p>Through the review of the application, Planning and Development staff provided a number of recommendations to provide for a building design that is compatible with its context and appropriate for the size of the site. These recommendations include: appropriate rear and side yard setbacks where units are facing into those yards in order to provide for adequate access to sunlight and privacy for adjacent properties; the inclusion of appropriately sized and safe pedestrian connections between the building and City sidewalk along College Avenue; clad the building in materials and colours found within the neighbourhood; design the ground floor units located along the College Avenue frontage to include individual access to the street; treat the proposed patios as front porches in order to animate the street edge; and, provide for an adequately sized common outdoor amenity area on the site. To date, a revised plan incorporating these recommendations has not been submitted.</p>
<p>The potential impact of the development on surrounding natural features and heritage resources;</p>	<p>No natural heritage features are present. However, the site is adjacent to Listed heritage buildings which, due to the proposed intensity, imposing mass, and reduced setbacks, will be affected by the proposed development.</p>
<p>Constraints posed by the environment, including but not limited to locations where adverse effects from landfill sites, sewage treatment plants, methane gas, contaminated soils, noise, ground borne vibration and rail safety may limit development;</p>	<p>There are no known constraints posed by the environment.</p>
<p>Compliance of the proposed development with the provisions of the City's Official Plan, Zoning By-law, Site Plan Control By-law, and Sign Control By-law;</p>	<p>The requested amendment does not conform to the policies of the 1989 Official Plan or The London Plan. Special provisions to the proposed R10-2 Zone are required to facilitate the proposed development with respect to setbacks.</p>

	The proposed setback reductions lend little opportunity for perimeter plantings, in conformity with the Site Plan Control By-law.
Measures planned by the applicant to mitigate any adverse impacts on surrounding land uses and streets which have been identified as part of the Planning Impact Analysis;	Limited tree planting and landscaping is proposed to mitigate adverse impacts on surrounding land uses. The reduced interior side yard setbacks offer little opportunity for enhanced landscaping and meaningful buffering. Staff remain concerned that the volume and bulk of the proposed building will have negative impacts on the surrounding neighbourhood, including the adjacent heritage properties, and have not been sufficiently addressed.
Impacts of the proposed change on the transportation system, including transit	No major impacts on the transportation system or transit are anticipated.



Legend

- | | | |
|---|--|-------------------------|
| Downtown | Multi-Family, Medium Density Residential | Office Business Park |
| Wonderland Road Community Enterprise Corridor | Low Density Residential | General Industrial |
| Enclosed Regional Commercial Node | Office Area | Light Industrial |
| New Format Regional Commercial Node | Office/Residential | Commercial Industrial |
| Community Commercial Node | Regional Facility | Transitional Industrial |
| Neighbourhood Commercial Node | Community Facility | Rural Settlement |
| Main Street Commercial Corridor | Open Space | Environmental Review |
| Auto-Oriented Commercial Corridor | Urban Reserve - Community Growth | Agriculture |
| Multi-Family, High Density Residential | Urban Reserve - Industrial Growth | Urban Growth Boundary |

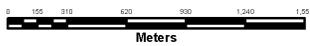
CITY OF LONDON

Planning & Development
OFFICIAL PLAN SCHEDULE A
- LANDUSE -

PREPARED BY: Graphics and Information Services



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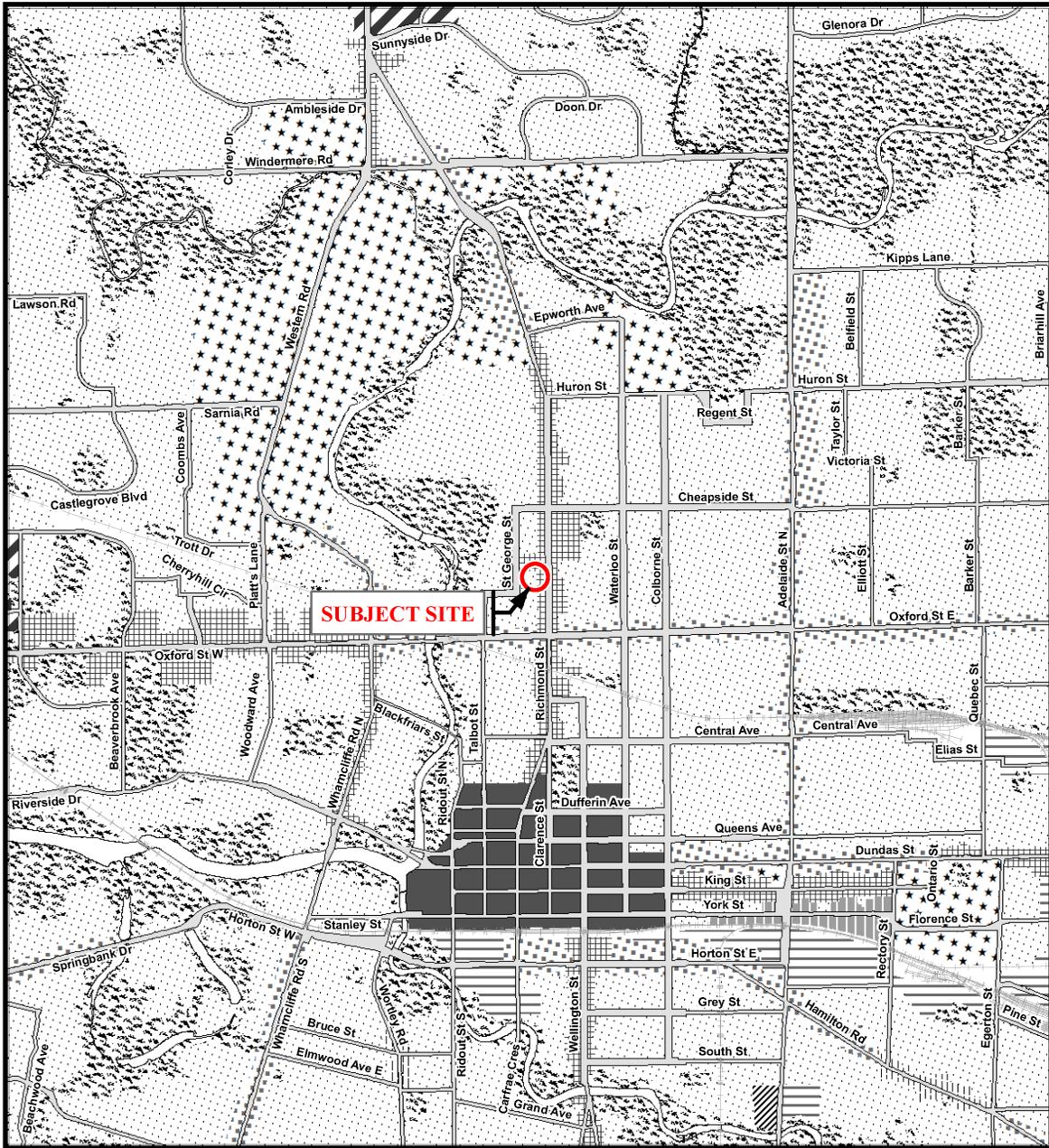


FILE NUMBER: OZ-8693

PLANNER: CM

TECHNICIAN: RC

DATE: 2024/04/16



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 Planning & Development's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

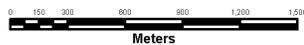
**CITY OF LONDON
Official Plan**

**LONDON PLAN MAP 1
- PLACE TYPES -**

PREPARED BY: Planning & Development



Scale 1:30,000

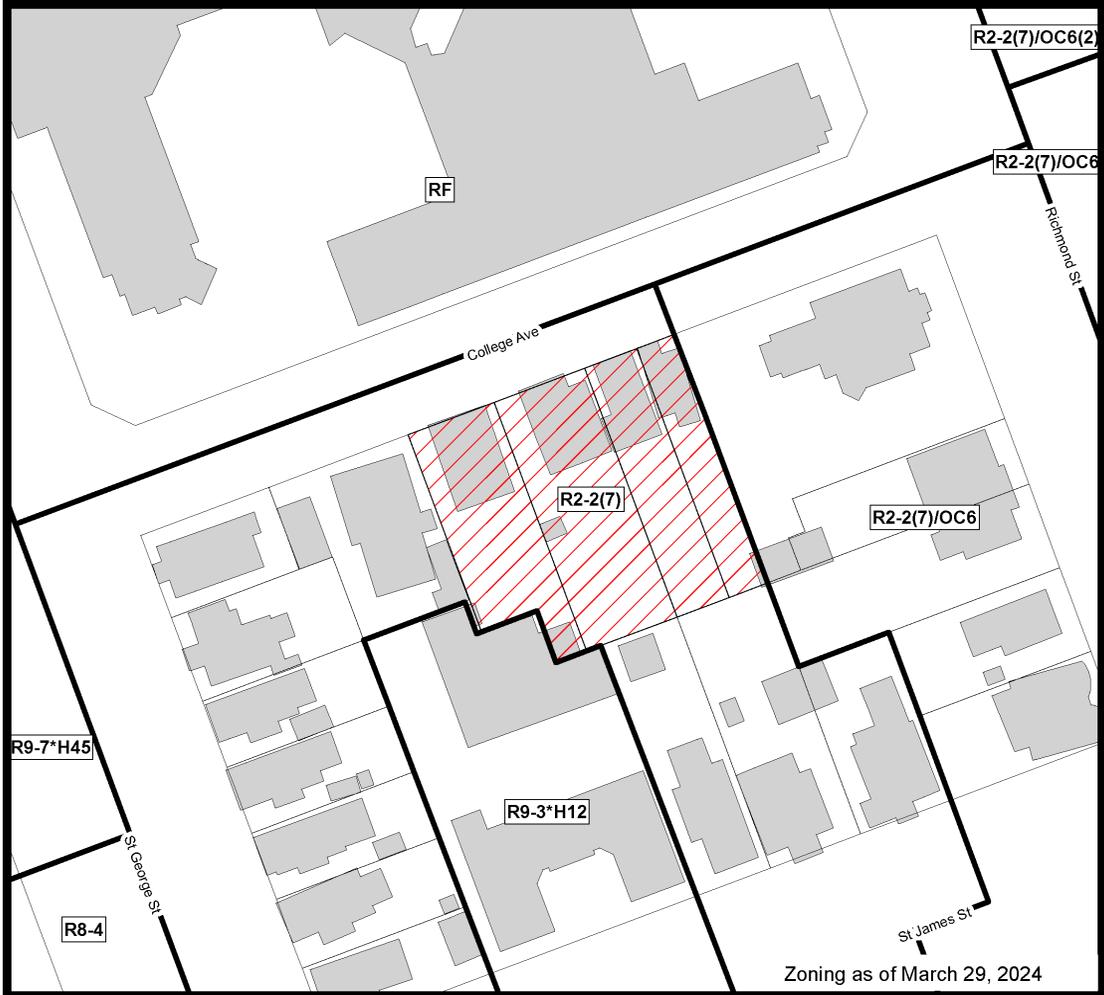


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Planner: CM

Technician: RC

Date: 2024/04/16



COUNCIL APPROVED ZONING FOR THE SUBJECT SITE: R2-2(7)

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

- | | |
|---|-----------------------------------|
| R1 - SINGLE DETACHED DWELLINGS | RF - REGIONAL FACILITY |
| R2 - SINGLE AND TWO UNIT DWELLINGS | CF - COMMUNITY FACILITY |
| R3 - SINGLE TO FOUR UNIT DWELLINGS | NF - NEIGHBOURHOOD FACILITY |
| R4 - STREET TOWNHOUSE | HER - HERITAGE |
| R5 - CLUSTER TOWNHOUSE | DC - DAY CARE |
| R6 - CLUSTER HOUSING ALL FORMS | |
| R7 - SENIOR'S HOUSING | OS - OPEN SPACE |
| R8 - MEDIUM DENSITY/LOW RISE APTS. | CR - COMMERCIAL RECREATION |
| R9 - MEDIUM TO HIGH DENSITY APTS. | ER - ENVIRONMENTAL REVIEW |
| R10 - HIGH DENSITY APARTMENTS | |
| R11 - LODGING HOUSE | OB - OFFICE BUSINESS PARK |
| | LI - LIGHT INDUSTRIAL |
| DA - DOWNTOWN AREA | GI - GENERAL INDUSTRIAL |
| RSA - REGIONAL SHOPPING AREA | HI - HEAVY INDUSTRIAL |
| CSA - COMMUNITY SHOPPING AREA | EX - RESOURCE EXTRACTIVE |
| NSA - NEIGHBOURHOOD SHOPPING AREA | UR - URBAN RESERVE |
| BDC - BUSINESS DISTRICT COMMERCIAL | |
| AC - ARTERIAL COMMERCIAL | AG - AGRICULTURAL |
| HS - HIGHWAY SERVICE COMMERCIAL | AGC - AGRICULTURAL COMMERCIAL |
| RSC - RESTRICTED SERVICE COMMERCIAL | RRC - RURAL SETTLEMENT COMMERCIAL |
| CC - CONVENIENCE COMMERCIAL | TGS - TEMPORARY GARDEN SUITE |
| SS - AUTOMOBILE SERVICE STATION | RT - RAIL TRANSPORTATION |
| ASA - ASSOCIATED SHOPPING AREA COMMERCIAL | |
| OR - OFFICE/RESIDENTIAL | "h" - HOLDING SYMBOL |
| OC - OFFICE CONVERSION | "D" - DENSITY SYMBOL |
| RO - RESTRICTED OFFICE | "H" - HEIGHT SYMBOL |
| OF - OFFICE | "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:
OZ-8693 **CM**

MAP PREPARED:
2024/04/16 **RC**

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Meters