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August 27, 2024

Planning and Environment Committee and Council
c/o Heather Lysynski
Committee Clerk
City Clerk's Office – City of London
300 Dufferin Avenue
London, ON, N6B 1Z2

RE: City of London Proposed Official Plan Amendments: City-Wide Heights Framework, Transit Villages and Major Shopping Areas

To Members of Committee and Council,

Please consider this letter a summary of formal comments regarding the City of London's draft proposed Official Plan Amendments (OPA's) specific to the City-Wide Heights Framework, Neighbourhood Place Type Heights and Permitted Uses, the establishment of new Transit Villages, and the establishment of Strategic Growth Areas/Major Shopping Areas.

Sifton submitted informal comments to City of London Planning Staff through email correspondence dated August 2 for consideration prior to preparation of the Staff Report and associated recommendation. This letter serves as formal documentation and builds on those comments submitted August 2 by Sifton.

1. Objectives of the OPA's

Sifton attended a consultation meeting held by Planning Staff along with other industry professionals on August 16. It was communicated by Planning Staff that one of the key objectives of the proposed OPA's is to move away from site specific requests by applicants for amendments to the policy framework of the London Plan, and work within the policy framework to be established through the proposed OPA's.

It is acknowledged that the proposed heights framework specific to the Urban Place Types provides for substantial increases in maximum building heights as compared to those currently permitted within the London Plan.

That being said, and with respect to the proposed heights framework specific to the Neighbourhoods Place Type, **minimal changes** are proposed and limited to the following:



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- Along neighbourhood connectors, an increase to maximum height from 3 stories to 4 stories at an intersection with a neighbourhood connector;
- Along neighbourhood connectors, an increase to maximum height from 4 stories to 6 stories at intersections with major streets (civic boulevard/urban thoroughfare);
- Along major streets, an increase to the base condition maximum height from 4 stories to 6 stories;
- Along major streets at intersections with other major streets, an increase in maximum height from 4 stories to 8 stories; and
- Change from application of maximum heights currently applied to Central London are now proposed to be applied to the Primary Transit Area (PTA), defined in Figures 3 and 4 of Policy 71_ of the London Plan.

We are concerned that the minimal changes proposed to the heights framework specific to the Neighbourhoods Place Type will not limit and/or reduce site-specific requests from applicants to amend the policy framework.

2. Neighbourhood Place Type Heights and Permitted Uses

As previously identified, minimal changes are proposed to the existing heights framework with respect to the Neighbourhoods Place Type. Further, it is to be noted that under the current framework, an upper maximum of 4 stories along a neighbourhood connector at intersections with a neighbourhood connector and an upper maximum of 6 stories along a neighbourhood connector at intersections with major streets is currently permitted subject to completion of a zoning by-law amendment. Further, an upper maximum height of 6 stories along major streets (inclusive of intersections with other major streets) is currently permitted subject to completion of a ZBA. As such, the only notable change to the framework is an increase in maximum height to 8 stories from the standard maximum of 4 stories (upper maximum of 6 stories) at a major street intersection. This change alone **does not provide for increased flexibility in the heights framework nor contribute to a general increase in housing.**

To provide for increased flexibility in the development of housing and to encourage intensification throughout the Urban Growth Boundary (UGB) as defined in the London Plan (*i.e. the development of a property, site or area at a higher density than currently exists*), we propose the following modifications to the height's framework.



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Street onto which property has frontage	Permitted Height (Base Condition)	Permitted Height at Intersections				Permitted Height Fronting onto Park
		Neighbourhood Street	Neighbourhood Connector	Civic Boulevard	Urban Thoroughfare	
Neighbourhood Street	Min. 1 Max. 3	Same as Base	Same as Base	Same as Base	Same as Base	Same as Base
Neighbourhood Connector	Min. 1 Max. 4 Max. 6 in PTA	Same as Base	Min. 2 Max. 4 Max. 6 PTA	Min. 2 Max. 6 Max. 8 PTA	Min. 2 Max. 6 Max. 8 PTA	Min. 2 Max. 4
Civic Boulevard and Urban Thoroughfare	Min. 2 Max. 8 Max. 12 in PTA	Same as Base	Same as Base	Min. 2 Max. 10	Min. 2 Max. 10	Same as Base

The modification to permit a maximum height of 4 stories (base condition) with frontage onto a neighbourhood connector is required to allow for greater flexibility in the development of those uses permitted under Table 10.

The modification to permit a maximum height of 8 stories (base condition), 10 stories at major street intersections and 12 within the PTA under the civic boulevard and urban thoroughfare street classifications is required to provide opportunity for a greater intensity of development along major streets and intersections where it can be supported. The increased height permissions are aligned with that of the High Density Overlay, carried over from the 1989 Official Plan, which currently applies to several major street intersections. Capping the maximum permitted height (base condition) at 6 stories and 8 stories in the PTA would result in missed opportunities in increasing the supply of housing.

The requested modifications will still allow for a hierarchy of building heights within the Neighbourhoods Place Type and in relation to other Urban Place Types, while ensuring a greater level of flexibility is built in to limit future site-specific requests for amendments to the policy framework. The City could utilize tools such as the Zoning By-law to manage height either through pre-zoning (Re-Think Zoning) or through planning applications on a site by site basis as opposed to placing limitations on the policy framework of the London Plan.

In addition to the above, we request that the expressway street classification be added to Table 11 to address those properties subject to the Neighbourhood Place Type with frontage onto the expressway. The expressway is arguably the highest order street, identified as a regional mobility connection (Figure 10 London Plan Policy 100_), and could thereby support a higher intensity of development (London Plan Policy 111_5). We request that a base condition maximum height of 10 stories and maximum height of 12 stories at intersections with major streets be applied.



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With respect to those uses permitted within the Neighbourhood Place Type in accordance with Table 10, we request that stacked townhomes be added as a permitted use on neighbourhood streets. Stacked townhomes are an excellent example of gentle intensification, with a low-rise built form that could be integrated well within a neighborhood context and should be permitted on all neighbourhood streets within the UGB. If not deemed to be appropriate, then at minimum, stacked townhomes should be added as a permitted use on all neighbourhood connectors and not only within the PTA. The proposed OPA only contemplates stacked townhomes within the PTA under this street classification.

3. Strategic Growth Areas/Major Shopping Areas

A list of 7 criteria to determine Major Shopping Area Place Type locations to be included in Strategic Growth Areas were released by Planning Staff on August 15 for the August 16 meeting, providing minimal opportunity for review and comment by industry representatives. The 7 criteria include the following:

1. Location inside the Built Area (2016) Boundary (BAB)
2. Location inside the Primary Transit Area (PTA)
3. Percentage over-parked
4. Land size of Shopping Area
5. Street Classification
6. Proximity to Neighbourhood Place Type
7. Dispersion around City of London

It is to be noted that in review of the draft OPA specific to Major Shopping Areas and proposed Policy 881 that the criteria to permit expansion of or to identify new major shopping areas in future differs from those criteria referenced above and utilized to select the major shopping areas proposed as part of this OPA. The criteria utilized to select major shopping area locations now and in future, should be consistent.

The identification of Major Shopping Areas within Strategic Growth Areas is a project under the Housing Accelerator Fund (HAF), where the **primary purposes and objectives are intensification and the provision of more housing**. Intensification, as defined in the London Plan, is not limited to the BAB. An intensification target exists to monitor and set a desired percentage of all new residential units that will be created within the BAB (London Plan Policy 81_), but the BAB is not the only place intensification can occur (London Plan Policies 80_ and 84_). Additionally, the PTA is to be the focus of residential intensification and contribute to achieving the desired intensification target in the BAB (London Plan Policies 90_, 91_ and 92. _3.), however, the policy framework does not limit the ability to intensify in other areas within the City.



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Criterion 3 and 4 should be viewed as potential or opportunity for re-development of existing shopping areas and in the case of Criterion 4, development potential for vacant lands subject to a Shopping Area Place Type, where there is the ability to intensify and provide for additional housing units.

Further to correspondence dated August 2, Sifton requested consideration of the lands municipally known as 1271 Riverbend Road (“West 5 Lands”) and 3480 & 3350 Morgan Avenue and 1363 Wharncliffe Road South (“Bostwick Lands”) to be identified as a Major Shopping Area (Appendix A). The above noted properties are vacant, designated as Shopping Area Place Type and represent an opportunity to provide for the development of additional housing units. The properties address the above noted criteria as follows:

- Located within close proximity to the BAB (West 5 and Bostwick Lands) and PTA (Bostwick Lands);
- Suitable size for future development of 3.71 ha (West 5 Lands) and 6.52 ha (Bostwick Lands);
- Located adjacent to the higher order street network inclusive of Oxford Street West (urban thoroughfare) applicable to the West 5 Lands and the intersection of Wharncliffe Road South/Bradley Avenue (civic boulevard/urban thoroughfare) applicable to the Bostwick Lands;
- Located adjacent to established neighbourhoods, where a mix of low and medium density residential dwelling types exist;
- Provision of existing and/or planned infrastructure to accommodate future development of these lands;
- Proximity to identified walking/cycling routes per Map 3 of the London Plan to assist in supporting active modes of transportation;
- Proximity to existing London Transit Commission (LTC) bus routes to provide for alternate modes of transportation;
- Proximity to existing commercial/office/retail, providing services to support a higher intensity of development; and
- Opportunity to disperse identified major shopping areas to serve all quadrants of the City (London Plan Policy 876_1). The addition of a major shopping area at the West 5 Lands would provide for a location at the far western extent of the City. The identified major shopping area at Wonderland Road South and Southdale Road West could be expanded to include the Bostwick Lands.



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4. Targets for future Planning and Development Applications

Section 6.0 of the London Heights Framework Review: Final Draft Report prepared by SvN Architects and Planners (SvN) provides for recommendations inclusive of design parameters to be utilized as guidance and those to be regulated. The presentation made by Planning Staff on August 16 positioned these recommendations as desired “targets” to be reviewed as part of future planning and development applications. In review of the draft OPA, the draft request to civic administration requests consideration by the site plan control authority of the identified targets in review of future planning and development applications. While we can appreciate that these are “targets to be considered”, we are concerned that the application of these targets through review of future planning and development applications may be mis-interpreted as a “must have” as opposed to encouraged.

It is our request of committee that all targets identified be removed as reference to them is not necessary. Each application brought forward should be evaluated on its own merits. Further, Committee/Council and Staff have recommended approval for applications that proposed the new recommended heights without the need for these desired targets.

In summary, we respectfully request the following:

1. That Committee modify the maximum heights permissions within the Neighbourhood Place Type for those street classifications as identified above;
2. That Committee add the expressway street classification and specify maximum height permissions within the Neighbourhood Place Type as identified above;
3. That Committee modify the list of permitted uses within the Neighbourhood Place Type to permit stacked townhomes along a neighbourhood street within the UGB, or at minimum, permit stacked townhome along a neighbourhood connector within all areas of the UGB and not limit the use to within the PTA;
4. That Committee consider identifying the West 5 Lands and Bostwick Lands as Major Shopping Areas; and
5. That Committee remove reference to desired targets, to be considered in review of future planning and development applications, in their entirety.



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We appreciate the opportunity to submit comments.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Haasen", written in a cursive style.

Alexandra Haasen, HBA
Project Manager, Planning and Development
Sifton Properties Limited

Attach (1)

cc. Phil Masschelein, Senior Vice President, Neighbourhood Developments – Sifton Properties Limited

Appendix A

1271 Riverbend Road (“West 5 Lands”)



3480 & 3350 Morgan Avenue and 1363 Wharncliffe Road South (“Bostwick Lands”)

