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# BROUGHDALE

## Community Association

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Susan Bentley, President; Marie Blosch, Treasurer; Christine Barker, Secretary; Heather Pearce, Member at Large; Mike Bartlett, Member at Large. [broughdalecommunityassociation@gmail.com](mailto:broughdalecommunityassociation@gmail.com)

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Michaela Hynes  
Planning & Development, City of London  
[mhynes@london.ca](mailto:mhynes@london.ca)

August 2nd, 2024

Dear Ms. Hynes:

**Re: Zoning By-Law Amendment File Z-9755**

The Broughdale Community Association is grateful for this opportunity to comment on the proposed zoning amendments concerning 2-4 Audrey Avenue and 186-188 Huron Street.

Zoning Bylaw Amendment File Z-9755 is contrary to the London Plan and does not represent good planning. We believe it should be held in abeyance while a comprehensive planning review is undertaken which the London Plan requires prior to approving spot rezonings in this area of the City.

While we acknowledge the urgent need for additional housing in London, we would like to point out that the proposed development lies within the neighbourhood of Broughdale, a Near Campus Neighbourhood (NCN) as defined in the London Plan. As such, there are special policies in place that seek to protect this area from further intensification. The London Plan clearly states at section 968 that all the NCN criteria need to be met in order for any change to be allowed. The proposed development violates several of the "Planning Goals for Near-Campus Neighbourhoods" defined in the London Plan. Specifically:

1. *968\_1 The proposed development is in conformity with the vision and planning goals for the Near-Campus Neighbourhoods.*

One of the most significant policies is the Floor Area Ratio (FAR) policy. We believe the proposed development is in contravention of this policy. The Ontario Municipal Board (OMB) considered a previous development proposal on the subject site in 2006 [PL060185, August 4, 2006, Decision/Order 2218] and found that the FAR was an important planning tool that applied to any proposed development on this site:

There is no doubt in this panel's mind that the floor area ratios which apply to the lands around UWO and which had their genesis in the 1995 Study were intended to apply to a variety of developments, including the Appellant's and not simply to the conversion of single-family homes. To permit the proposed development without floor area ratios established by the City would be entirely inconsistent with what the City of London has

been doing in this area, from a regulatory perspective, for the past number of years.  
(page 4)

2. *965\_1. Plan for residential intensification in a proactive, coordinated and comprehensive fashion, utilizing secondary plans and master plans where appropriate.*

There is nothing coordinated or comprehensive about this proposed Zoning By-Law Amendment! The Broughdale Community Association strongly supports holding this matter in abeyance until a comprehensive planning review of the neighbourhood – specifically the region bounded by Richmond and Huron Streets, the Thames River and Western University – can be initiated and completed. Our Association would support the City initiating such a review.

Forging ahead with this development would set a precedent and effectively, as stated by the OMB in 2006, rezone the area without the appropriate study. In its 2006 Decision on the subject lands, the OMB considered this point and agreed, writing:

During the course of this hearing, there was also considerable discussion concerning the precedent setting nature of this proposal ... It is this panel's view that if the proposal were approved, reasonable expectations will be created in the minds of many investors that developments similar to or identical with the Appellant's will be approved on a go forward basis. Effectively therefore, a precedent would be established which would be felt well beyond the immediate vicinity of Huron Street ... the proposal would effectively rezone the entire area without the level of public participation required by the *Planning Act*. (pages 4-5)

3. *965\_3. Do not allow for incremental changes in use, density, and lot size through zoning amendments, minor variances and consents to sever that cumulatively lead to undesirable changes in the character and amenity of streetscapes and neighbourhoods.*

The proposed zoning amendment will increase the density to 82 units per hectare, which is more than twice the permitted density of 35 UPH. It will permit the construction of two massive buildings standing in a sea of concrete parking lot. There is nothing unique about the subject site that warrants this drastic zoning amendment. The proposed development is in the interior of the neighbourhood, which is composed of small buildings that together create an intricate streetscape. The sheer size and mass of the proposed townhouse complex, combined with its closeness to the street, will make it stand out from these surroundings like a sore thumb. The entire streetscape, particularly the termination of St. George Street, will be negatively impacted.

4. *965\_5. In the pursuit of balanced neighbourhoods, recognize areas that have already absorbed significant amounts of residential intensification and residential intensity and direct proposals for additional intensification away from such areas.*

"Residential Intensity" is defined in 966\_ of the London Plan as "*the increase in the useability of an existing dwelling, building or site to accommodate additional occupancy.*" This type of increase has already occurred both at the subject site and in the neighbourhood as a whole.

The subject site was originally two lots, each with one home fronting Huron Street. Previously, the Applicant created four lots by way of severance, demolished the two

existing homes, and built four residences. The OMB noted that the creation of the two additional lots was a significant intensification of the site:

The fact that the Appellant was granted severances to increase his two lots to four is of itself an example of significant intensification of the site. (page 4)

This earlier development, which replaced two homes with four residences, doubled the residential intensity of the site. The current development proposal would further increase the residential intensity excessively, raising the number of bedrooms from the existing 20 to 70. A compound of seventy bedrooms circling a parking lot is completely out of character and scale with the surrounding area, even after taking into consideration the recent amendment to the Zoning By-Law that permits adding bedrooms in the form of Additional Residential Units (ARUs).

Broughdale has received a large amount of infill and development over the last forty years, going from 80% owner-occupied housing to approximately 15% today. This has created a significant residential intensity in our neighbourhood, as modest two-bedroom family homes have been turned into 5–7-bedroom accommodation for young adults with the associated impacts on city services such as policing during Homecoming and other student events, and garbage collection.

In conclusion, Zoning Bylaw Amendment File Z-9755 represents an extreme over-intensification of the site. The buildings and parking area cover most of the lot, leaving very little green space. To overbuild to this extent, multiple special provisions are required for front and exterior yard setback and interior side yard setback, maximum density, and maximum bedrooms. The proposal should be denied, or in the alternative, held in abeyance while the city initiates and completes a comprehensive planning review of the neighbourhood as set out in the London Plan.

Yours faithfully

Susan Bentley,

A handwritten signature in cursive script that reads "Susan Bentley".

Interim President  
Broughdale Community Association