



LONDON DEVELOPMENT INSTITUTE

September 5, 2024

RE: Agenda Number 3.6 PEC - September 10 - PPM – Heights Review/Transit Village/Major Shopping Area

Hello Mr. Mayor and Councillors

I wanted to provide you with LDI's position on the draft Heights Framework Review OPA as posted on the City's Get Involved London website and the staff report regarding this item for the September 10th PEC meeting.

Our preference would have been that these recommended changes would have been incorporated into the staff report for the PPM on September 10th. They were not.

We were led to believe that this height review was to analyze and recommend changes to the height permissions in the London Plan to reflect the reality of the heights staff have been recommending and Council approving over the last two or more years.

The recommended staff changes have gone beyond height permissions to include new design elements that were not part of previous approval requirements. We want to be clear that we disagree with these changes being included in this OPA.

The following is a description of our recommendations and reasons for the proposed changes. I have also listed the clauses in the draft amendments affected at the end of this e-mail.

Changes to the Tables: (Appendix "A" of the staff report)

Table 8 and 9 (City Wide and Rapid Transit and Urban Place Types):

- Overall support recommended height changes in Table 8 with one exception:
- Rapid Transit Corridors (Other properties on a Rapid Transit Corridor) height permissions should be 20 storeys and not 15.

Reasons for LDI Recommendation:

1. Reflects current permission differential in the London Plan (16 storey to 12 storey)
 2. The London Plan supports our recommended change to 20 storeys in support of future transit growth.
- [828](#) Our Urban Corridors will support a form of development that is very similar to our Rapid Transit Corridors, but at a slightly lower intensity. There will be places that encourage intensification over the life of this Plan so that they can mature to support higher-order transit at some point in the future beyond 2035. These corridors will support residential and mixed-use development. Like the Rapid Transit Corridors, different segments of these Urban Corridors may vary in use, character, and intensity.

562 Wellington St., Suite 203, London, Ontario, N6A 3R5

tel. (519) 642-4331

www.londondev.ca

londondev@rogers.com



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Additional Item for Consideration from LDI

- On Table 8 the current HDR overlay has height restrictions of 12 storeys outside a PTA and 14 Storeys inside in a PTA. We would recommend that a 15 storey permission be implemented for the entire HDR overlay

Table 10 (Permitted Uses):

- Stacked townhouses should be added to the Neighbourhood Streets classification as permitted use.

Reasons for LDI Recommendation:

- Promotes intensification
- Stacked townhouses are a form of townhouses that are allowed as a primary permission on all street fronts in Table 10. The distinction between types of townhouses is not required. If, however, they are to be identified separately in the London Plan as a permitted form of housing LDI is recommending they be included in the Neighbourhood street classification.
- Stacked townhouses are currently allowed under R6 and some R5 zones so why are we reducing current permissions? Is this not the opposite of encouraging more housing units.
- At a minimum, Stacked Townhouses, should be added to the " Range of primary permitted uses" for Neighbourhood Connector. This additional permitted use would then also be permissible at intersections of higher order streets as identified in Table 10.

Table 11 (Neighbourhood Place Types):

Civic Boulevard and Urban Thoroughfare (Major Streets)

- Base condition change to maximum of 8 stories on major streets defined as Civic Boulevard/Urban Thoroughfare in the London Plan
- Change heights to 12 storeys within a PTA, 10 storeys on all major street intersections and 8 stories on all other major streets as recommended above.

Neighbourhood Connector

- Base condition of 4 stories along a Neighbourhood Connector with 6 stories within a PTA.



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Reasons for LDI Recommendations:

Major Streets

- Restricting building heights to 6 storeys along major streets except within the PTA and at major street intersections is leaving a lot of development potential of housing supply on the table, for locations where 7 or 8 storeys could be appropriate. Requiring an OPA, and not just a ZBA, any time an applicant wants more than 6 storeys on a major street will make such proposals very difficult once this new policy is set. If 8 storeys were permitted as a base condition on major streets, that height would align with the definition of mid-rise at the Official Plan policy level and the zoning by-law can sort out where this maximum height is, and is not, permitted either through pre-zoning (ReThink Zoning result) or through planning applications. But the policy permissions would allow for it without an OPA.
- Providing for a base condition of 8 stories along all Major Streets will align with the goal of creating a “hierarchy” of building heights while increasing to a maximum of 10 stories at intersections with Major Streets will provide opportunity for a higher intensity of development at key locations where it can be supported
- Height change supported in other approved planning policies including SWAP (mid-rise to 9 storeys and the London Plan definition of High-rise being above 8 storeys)

Neighborhood Connector

- Change in height reflects what is actually required for redevelopment to be viable in the marketplace

In the Staff Recommendation:

Remove part d) of Recommendation (Civic Administration be requested...)

- Staff have added part d) which requires staff to review applications at the site plan stage to consider several new targets.
- We are asking all these targets **Not** be a directive to staff. We believe these “targets” are simply not necessary and any reference to them should be deleted.
- We are requesting all of d) be removed from the proposed OPA

Reasons for LDI Recommendation:

- We appreciate staff repositioning these items as “targets to be considered” but this is a slippery slope that is open to interpretation by planning staff as “must haves” and not “like to have”. Staff have already started using these “targets” as requirements during recent application pre-consultations
- Each application should be evaluated on its merits under current regulations. Council and staff have been approving applications that meet the new recommended height without the need for these “targets”.



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Major Shopping Areas

- To be consistent with Clause 127, in Clause 130 the word “Major” needs to be added to distinguish types of shopping areas as strategic growth areas
- To provide better flexibility Clause 877.2 should be amended by removing “will be required” with should be incorporated”
- Remove criteria number 4 to allow for flexibility for each application to be evaluated whether linear or nodal. Evaluation criteria restriction not needed.
- Remove evaluation criteria number 6 from Clause 881A of the proposed changes.

Reasons For LDI Recommendations:

- We are unclear of the reason for the restriction” not be Permitted” in the delineation of “nodal” and “linear” Major Shopping Areas. Our suggested wording would provide flexibility for site-by-site analysis
- Evaluation criteria number 6, “New Major Shopping Areas”, only permitted in the Built Area Boundary”. This should be removed to allow identification of the Major Shopping Areas designation throughout the City

For Reference:

Proposed LP Policy Clauses we are recommending changes: (Appendix “C”

- Clause 130
- Clause 877.2
- Clause 881.A
- Tables 8,9,10,11

Thank you for considering the above changes.

Thanks

Mike Wallace
Executive Director