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September 6, 2024

Chair Lehman and Members of Planning and Environment Committee
City of London
300 Dufferin Avenue
London, ON
N6B 1Z2

RE: LONDON PLAN HEIGHTS REVIEW, TSA ZONING UPDATE AND MAJOR SHOPPING AREAS

Chair Lehman:

Auburn Developments, as an independent developer and as member of the London Development Institute, has been consistently engaged in the various planning policy reform initiatives being undertaken by the City of London throughout 2024. These have included the Land Needs Assessment, the London Plan Heights Review, the Transit Station Area Zoning Update, and other other projects stemming from our involvement in the Housing Supply and Customer Service/Process Improvement Reference Groups. We value these opportunities to work with Staff and Council to improve our city with the ultimate goal of building more housing.

We have previously provided commentary to Staff on the Heights Review and Transit Area Zoning proposals both in person at various consultation meetings and presentations as well as in writing. We raised significant concerns regarding the framework which was initially proposed. As an industry, we identified many regulations which would stifle development and economic interest in London and which would work against the stated initiative of speeding up housing approvals by reducing the number of proposals which needed to be approved by Council.

Transit Station Area Zoning

Some of the issues we raised related to unrealistic and infeasible design standards being included within the base zoning. These would necessitate privately initiated ZBA applications prior to development and, as a result, would not create an as-of-right permissions environment. The standards proposed by Staff were not grounded in the London context, and instead have been proposed by a consultant from Toronto who did research on cities like Ottawa, Vaughn, and Kelowna and Victoria, British Columbia. Many of these issues are covered off in a submission from LDI, however, we wish to restate a few of the most problematic regulations here to ensure they are raised to the attention of yourself and your colleagues on Planning and Environment Committee.

- **Restrictions on stand-alone residential buildings, meaning in the areas where the City is anticipating the most intense development, you cannot build a purely residential apartment building.**
- **Maximum Floor Area Ratios are too low, meaning maximum permitted heights often cannot be reached without a zoning amendment or variance to increase the Floor Area Ratio.**
- **Regulating floorplate areas will make housing more expensive, and is not something that should be controlled by the City.**

Permitted Heights in Neighbourhoods Place Type

There has been significant increases in scope compared to the initial commitment the City made as part of its housing pledge to secure funding from CMHC's Housing Accelerator Fund. This has included Staff-led processes in the creation of a new Place Type (Major Shopping Area) and slight rework of the permitted heights in the "Neighbourhoods" Place Type.

We recommend that the height limits below be implemented in the "Neighbourhoods" Place Type:

- **Frontage on a Major Road: height limit of 8 storeys**
- **Frontage on 2 Major Roads: height limit of 10 storeys**
- **Frontage on 2 Major Roads inside the Primary Transit Area: height limit of 12 storeys**

Major Shopping Areas

An additional initiative to the HAF project to implement as-of-right zoning near transit is the creation of a new Place Type in the London Plan - “Major Shopping Area”. The “Shopping Area” Place Type already exists, but the addition of “Major Shopping Area” creates a hierarchy for mixed land uses in London. “Shopping Areas” are now proposed to accommodate 8 storey heights while “Major Shopping Areas” will allow 15 storeys. This increase in heights and residential use permissions means we now have the ability to create major and minor nodes throughout the city. Nodes contain a mix of uses and are the central hub of activity within neighbourhoods.

Through our comments to Staff on the various proposed changes, Auburn has requested include two of our sites to be included in the proposed “Major Shopping Area” so that we may develop within the new nodal framework. Zoning amendments including detailed plans for these sites would still need to come forward to Committee and Council as Staff are not proposing to implement as-of-right zoning at this time.

Staff have identified many successful operating commercial plazas as “Major Shopping Areas” while ignoring sites which are more likely to proceed to development in the near term. The City’s target of building 47,000 homes by 2031 would be best served by designated development-ready parcels to unlock housing potential without the need for costly and time-consuming privately initiated OPA processes.

1924 Adelaide Street North

The first site we have requested be designated “Major Shopping Area” is at the northeast corner of Sunningdale Road East and Adelaide Street North, beside the Stoney Creek Community Centre. A portion of the site is already designated Shopping Area, and with the proximity to significant existing and planned amenities, we believe this is an excellent location for nodal development as a “Major Shopping Area”.

Auburn recently had a pre-submission consultation with Staff for these lands where we propose a mixture of housing types including medium density townhomes and rental apartments combined with a neighbourhood-scale shopping plaza. We believe there is a great opportunity here to develop a node within north London which builds on the

success of the Stoney Creek Community Centre and anchors the Adelaide Street North corridor with a mix of commercial uses and housing. The site is serviced by transit and is adjacent to one of the City’s premier recreation facilities. Future development on surrounding lands will benefit from the creation of a centralized community node in this location.

We request that Committee endorse a modification to the proposed “Major Shopping Areas” and include the lands at 1924 Adelaide Street North, identified in the mapping below, as “Major Shopping Area”.

LEGEND

PLACE TYPES

- Green Space
- Environmental Review
- Downtown
- Transit Village
- Rapid Transit Corridors
- Urban Corridors
- Shopping Area
- Main Street
- Neighbourhoods



1269 Hyde Park Road











Auburn recently acquired the above site, known locally as the Crossings Restaurant on Hyde Park Road. The lands, totalling just over 3 acres, are presently designated as “Shopping Area” within the London Plan. They are part of a larger multi-use commercial node which includes the large Oxford Dodge site, a mixed commercial plaza at the northeast corner of Sarnia Road and Hyde Park Road, Moffatt and Powell Rona on the west side of Hyde Park Road, and a recently approved mid-rise residential subdivision west of the intersection of Sarnia and Hyde Park.

This site is prime for redevelopment with access to many daily and weekly amenities and necessities. It is located away from low-rise residential areas, separated by a rail corridor and a SWM facility. A zoning by-law amendment detailing the proposed development would be required prior to a site plan application which implements the “Major Shopping Area” designation. This would include comprehensive assessment of the existing bulding which is listed on the heritage register and would outline mitigation requirements for development.

Similar to the previous site at 1924 Adelaide Street North, we have requested through prior written communication that this site be designated as “Major Shopping Area” as part of this overall process.

LEGEND

PLACE TYPES

-  Green Space
-  Environmental Review
-  Downtown
-  Transit Village
-  Rapid Transit Corridors
-  Urban Corridors
-  Shopping Area
-  Main Street
-  Neighbourhoods
-  Institutional





The Hyde Park Road “Main Street” corridor terminates at the rail line at the north edge of these lands. Designating 1269 Hyde Park Road as “Major Shopping Area” would create an anchoring node at the south end of the “Main Street” corridor. Successful corridor development requires complementary nodes to establish an overall community structure. Development on this site would increase the local population which can patronize and support local businesses within the corridor to the north.

There are significant commercial amenities to the north at Hyde Park Road and Fanshawe Park Road and more commercial amenities to the south at Hyde Park Road and Oxford Street West. The site is serviced by transit (LTC Route 19) and is within walking distance to many local businesses within the Hyde Park Road corridor.

We request that Committee endorse a modification to the proposed “Major Shopping Areas” and include the lands at 1269 Hyde Park Road, identified in the preceding mapping, as “Major Shopping Area”.

Summary of Requests

- **Increase max Floor Area Ratios within TSA zones**
- **Allow standalone residential buildings in all TSA zones**
- **Remove design regulations from proposed TSA zoning and site plan control**
- **Implement increased heights based on geography within “Neighbourhoods”**
- **Designate 1924 Adelaide Street North and 1269 Hyde Park Road as “Major Shopping Areas”**

We appreciate your consideration of our requests.

Sincerely,



Alex Vandersluis

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cc: *Mayor Josh Morgan, City of London*
Councillor Jerry Pribil, Ward 5, City of London
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