



Zelinka Priamo Ltd.

LAND USE PLANNERS

September 17, 2024

sent via email

Mayor Morgan and Councillors
The Corporation of the City of London
300 Dufferin Avenue
London, ON
N6A 4L9

Dear Mayor Morgan and Councillors,

**Re: Additional Comments
Official Plan and Zoning By-Law Amendments - PMTSA Zoning Review
(City Files OZ-9749, O-9752)
BlueStone Properties Inc.
695 Proudfoot Lane
London, ON**

Our File: BSP/LON/22-01

Zelinka Priamo Ltd. are the planning consultants retained by BlueStone Properties Inc. ("BlueStone"), owners of the above-referenced property, partially-developed with one 12-storey apartment building.

On behalf of BlueStone, we have been monitoring the proposed changes to the *London Plan* and the City of London Z.1 Zoning By-law related to reviewing the Building Heights Framework (O-9752) and Transit Station Area Zoning (OZ-9749) implementation. Comments were provided to members of the Planning and Environment Committee ("PEC") for consideration prior to the Public Participation Meeting for the City-initiated Official Plan and Zoning By-law Amendments held on September 10, 2024 (enclosed).

During the PEC meeting, further changes were proposed to the "*Transit Village*" Place Type policies and the "*TSA*" zone categories. We wish to provide additional comments on behalf of BlueStone:

- It is our professional opinion that the proposed "*TSA*" zoning categories do not comprehensively implement the intensification goals prescribed in the policies and by-law as recently amended at PEC. In our submission, we request that, particularly for the subject lands, the maximum building height of the "*TSA3*" Zone be increased to at least 25-storeys;
- We note that the "*TSA3*" Zone was intended to apply to properties at the periphery of the "*Transit Village*" Place Type, limiting building heights to a maximum of 15-storeys to provide an appropriate height transition to the adjacent "*Neighbourhoods*" Place Types. However,

the amended policies for the “*Transit Village*” Place Type would allow maximum building heights of up to 35-stories. It is anticipated that the respective “*TSA*” zone categories will be revised to achieve the same transition from the core of the “*Transit Village*” to the periphery. It is our professional opinion that the zoning of the subject lands and other properties on the periphery of the “*Transit Village*” Place Type should be permitted to develop with building heights of up to 25-storeys. The zoning of the subject lands, and other properties within a designated “*Transit Village*”, to a maximum building height of 15-storeys does not align with these policy changes, nor the overall goals of the “*Transit Village*” Place Type; and,

- Other proposed amended policies and regulations consist of changes including increasing permitted building heights in “*Rapid Transit Corridors*” to be up to 25-storeys; and, subsequently removing the “*TSA1*” Zone category, which also limited building heights to 15-storeys, thus zoning individual properties along “*Rapid Transit Corridors*” for a maximum building height of 25-storeys. It is our opinion that maintaining the current “*TSA3*” Zone regulations on the subject lands, and those peripheral properties within the “*Transit Village*”, is an oversight; particularly because when considering the structure of the Place Type designations, the “*Transit Village*” is intended to be more intense in terms of height and density than all other Place Types except “*Downtown*”. In order to fulfill the planned function of the “*Transit Village*” Place Type and align with the proposed policy changes, we recommend amending the “*TSA3*” Zone category to permit a maximum building height of 25-storeys, or, alternatively, place the subject lands within a “*TSA*” zone category that would permit a maximum building height of 25-storeys.

We appreciate your consideration of our request. We will continue to monitor the implementation of the Official Plan and Zoning By-Law Amendments, and reserve the right to provide further comments.

We trust that this information is satisfactory. Should you have any questions, or require further information, please do not hesitate to contact the undersigned.

Yours very truly,

ZELINKA PRIAMO LTD.



Laura Jamieson, B.Sc.
Intermediate Planner

cc. BlueStone Properties Inc. c/o Mardi Turgeon

Encl.



Zelinka Priamo Ltd.

LAND USE PLANNERS

August 29, 2024

sent via email

Ms. Michaella Hynes, MPL
Planning and Development Services
The Corporation of the City of London
300 Dufferin Avenue
London, ON
N6A 4L9

Dear Ms. Hynes,

**Re: Official Plan and Zoning By-Law Amendments - PMTSA Zoning Review
BlueStone Properties Inc.
695 Proudfoot Lane
London, ON**

Our File: BSP/LON/22-01

Zelinka Priamo Ltd. are the planning consultants retained by BlueStone Properties Inc. ("BlueStone"). BlueStone is the owner of a developed site within a proposed Transit Station Area (TSA3 h-213) Zone, known municipally as 695 Proudfoot Lane (the "subject lands").

The subject lands are located on the west side of Proudfoot Lane south of Beaverbrook Avenue, with a lot frontage of approximately 205m on Proudfoot Lane, a lot frontage of approximately 140m on Horizon Drive, and a lot area of approximately 2.96ha. The lands are developed with a 12-storey apartment building fronting Proudfoot Lane. Currently, the subject lands are located within a "Transit Village" Place Type, which permits building heights up to 22-storeys. The subject lands are zoned "Residential (R9-1 H36)", which permits with a maximum height of 36m or 12-storeys.

On behalf of BlueStone, we have been monitoring the proposed changes to the *London Plan* and the City of London Z.1 Zoning By-law related to reviewing the Building Heights Framework and Transit Station Area Zoning implementation. The subject lands are proposed to remain within the "Transit Village" Place Type, with policy changes proposed to permit building heights of up to 30-storeys. Additionally, the subject lands are proposed to be included in the "Transit Station Area 3 Holding (TSA3 h-213)" zone, which would permit building heights up to 15-storeys as-of-right.

We wish to provide the following comments on behalf of BlueStone:

- It is our professional opinion that the proposed zoning of the subject lands is not appropriate considering the proposed policy changes related to maximum building heights in the City of London. The subject lands are within the "Transit Village" Place Type, which would permit building heights of up to 30-storeys; whereas the subject lands are proposed to be zoned "Transit Station Area 3 (TSA3)", which would allow for building heights up to only 15-storeys. With proposed policies encouraging intensification and greater building

heights, particularly in Transit Villages where the second greatest mix of uses and intensity of development is permitted, the zoning of the subject lands to a TSA3 zone with a maximum building height of 15-storeys does not align with the policy changes for lands within Transit Villages and other Place Types where increased building heights are being considered (see below). In our submission, we suggest that the TSA4 zone be applied to the subject lands, as is it consistent with the zoning of the majority of the surrounding lands within the “*Transit Village*” Place Type;

- The proposed changes to the Building Heights Framework would permit buildings up to 15-storeys in height along Rapid Transit Corridors, Urban Corridors, and in Major Shopping Areas. While the proposed policies of the Building Heights Framework would permit a maximum building height of up to 30-storeys, the proposed zoning of the subject lands is more in keeping with the less intense “*Corridor*” or “*Shopping Area*” Place Types. In our submission, lands within identified “*Transit Villages*” should be zoned to implement provisions which provide clear distinction for areas which are intended to be most intensive in terms of height and density; and,
- The subject lands are in a unique location with: limited sensitive low-density residential uses nearby; direct access to transit immediately on Proudfoot Lane; and convenient access to significant amenities including grocery stores, retail uses and restaurants within a short, walkable distance to serve residents. For these reasons, it is acknowledged that the subject lands can accommodate additional building height and residential density with minimal impacts on adjacent land uses.

We appreciate your consideration of our request, and would welcome the opportunity to meet with City staff to discuss our position in greater detail.

We will continue to monitor the implementation of the Official Plan and Zoning By-Law Amendments, and may provide further comments on behalf of BlueStone once additional information has been provided.

Please kindly ensure that the undersigned is notified of any further meetings or notices related to this matter.

Yours very truly,

ZELINKA PRIAMO LTD.



Laura Jamieson, B.Sc.
Intermediate Planner

cc. BlueStone Properties Inc. c/o Mardi Turgeon