

Report to Planning and Environment Committee

To: Chair and Members
Strategic Priorities and Policy Committee

From: Scott Mathers, MPA, P.Eng.
Deputy City Manager, Planning and Economic Development

Subject: Heights Review/Transit Village/Major Shopping Area
File Number: OZ-9726, OZ-9727, O-9752, & O-9753

Date: September 10, 2024

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to Phase 2 of the Section 26 Official Plan Review of *The London Plan*:

- a) The proposed by-law attached hereto as Appendix "A" to adopt Phase 2 of the Section 26 Review of The London Plan, **BE INTRODUCED** at the Municipal Council meeting being held on September 24, 2024 and **BE FORWARDED** to the Ministry of Municipal Affairs and Housing for approval;
- b) The Minister of Municipal Affairs and Housing **BE ADVISED** that Municipal Council declares that Phase 2 of the Section 26 Review of The London Plan does not conflict with provincial plans, has regard to the matters of provincial interest, and is consistent with the Provincial Policy Statement;
- c) The proposed by-law attached hereto as Appendix "B" **BE INTRODUCED** at the Municipal Council meeting on September 24, 2024, and **BE GIVEN** two readings, to amend Zoning By-law No. Z.-1, in conformity with the Official Plan, The London Plan, as amended in part (a) above, to amend Figure 4.19 Areas Exempt from Minimum Parking Standards, **IT BEING NOTED** that the third reading of the by-law would occur at such time as the Official Plan Amendment described in part (a) above is approved and in-force;
- d) Civic Administration, including the Site Plan Control Authority, **BE REQUESTED** to consider the following targets in the review of planning and development applications:
 - i) A maximum tower floorplate of 950m-1,100m for buildings above 12 storeys in height;

- ii) A minimum tower separation of 25m within a site for buildings above 12 storeys in height;
 - iii) A minimum tower setback of 12.5m from an interior side or rear lot line, or 15m from a Neighbourhoods area for buildings above 12 storeys in height;
 - iv) A minimum of 5 hours of sunlight (at the summer equinox) on any public parks;
 - v) A minimum step-back of 1.5m above any of floors two to six;
 - vi) A minimum first floor height of 4m in any Place Type that encourages mixed use or commercial development;
 - vii) Transparent glazing be included on the building façade adjacent to a public street or other public space.
- e) Civic Administration **BE DIRECTED** to monitor implementation of this amendment and report back with possible further amendments after one year of the approval of the by-law including consideration to increase heights within 250 metres of a Rapid Transit Corridor station, and outside of the Primary Transit Area;

IT BEING NOTED that the Site Plan Control By-law and Zoning By-law will be included in a future review to implement this amendment and address the recommendations of the London Height Framework Review report (July 2024) prepared by SVN Architects and Planners.

Executive Summary

Summary of Amendments

The recommended amendments are part of the official plan review of *The London Plan* under section 26 of the *Planning Act*. The amendments include substantial changes that will increase opportunities for growth and development in all Place Types. Specifically, the proposed changes can be grouped into three categories: increasing maximum permitted building heights, adding two new Transit Villages, and creating new Strategic Growth Areas that include Major Shopping Areas.

1) Increase Maximum Building Heights

The Maximum permitted building heights are amended to increase opportunities for intensification and redevelopment and support a higher number of dwelling units throughout the City. The approach to planning for building heights is also updated by removing the “standard maximum” and “upper maximum” heights and only applying one maximum height for each Place Type. Within the Place Types the heights are amended as shown in the following table.

Place Type	Current Maximum Height (storeys)	Recommended Maximum Height (storeys)
Downtown	35	45
Transit Village	22	30
Rapid Transit Corridor (near station stops and within Main Street segments)	16	25
Rapid Transit Corridor (all other segments)	12	15
Urban Corridor	10	15
Major Shopping Area (new category)	6	15
Shopping Area	6	8
Main Street	6	8
Neighbourhoods (on Major Streets in the Primary Transit Area)	6	8
Neighbourhoods (on Neighbourhood Connectors in the Primary Transit Area)	3	4

2) Add two Transit Villages

The second major component of the recommended amendment is to create two new Transit Villages located at the intersection of Richmond and Oxford Streets, and on the south side of Dundas Street East at Kellogg Lane. These sites both offer a significant opportunity for redevelopment and intensification, and will support redevelopment in central, well-connected locations. It should be noted that Council approved the designation of the Dundas Street and Kellogg Lane site through the employment land conversion process earlier this year, so for that site this amendment includes minor

changes to fit that Council-approved Transit Village within the broader planning framework.

3) Identify Strategic Growth Areas and Major Shopping Areas

Finally, the recommended amendment will identify Strategic Growth Areas in London and create a new category of high-rise intensification nodes called a Major Shopping Area Place Type. All of the Place Types that permit high-rise development are identified as Strategic Growth Areas, and ten of the existing Shopping Areas will be identified as Major Shopping Areas where additional building height is proposed to be permitted. Strategic Growth Areas is a new term from the Provincial Planning Statement, 2024 and it includes areas in the city that will be the focus of high-density intensification and more compact forms of development.

Purpose and the Effect of Recommended Action

The purpose and effect of the recommended Official Plan and zoning by-law amendment is to:

- 1) Update *The London Plan* policy direction so that it is up-to-date based on current development trends and reliable to set expectations for future development.
- 2) Increases the opportunity for housing units throughout the City, to help achieve London's Housing Target and commitments made through the Housing Accelerator Fund.
- 3) Align intensification with planning priorities and key directions of The London Plan, including the City Structure Plan.
- 4) Streamline development processes by avoiding the need for amendments to *The London Plan* for appropriate uses, intensities, and forms of development.
- 5) Provide a planning policy framework that is consistent with the new Provincial Planning Statement, 2024 and the current Provincial Policy Statement, 2020.

Linkage to the Corporate Strategic Plan

Supporting opportunities for further intensification and associated policies helps the City respond to Provincial policy directions with support from the Housing Accelerator Fund (HAF). Collectively, these amendments support the following Strategic Areas of Focus:

Economic Growth, Culture and Prosperity by supporting London to be a regional centre that proactively attracts and retains talent, business, and investment.

Housing and Homelessness by supporting faster/streamlined approvals and increasing the supply of housing with a focus on achieving intensification targets.

Building a Sustainable City by ensuring infrastructure is built, maintained, and secured to support future growth and protect the environment.

Climate Change/Emergency was declared by City Council on April 23, 2019. The subsequent Climate Emergency Action Plan (April 2022) states several goals being undertaken simultaneously. These HAF projects will address several Areas of Focus for climate change mitigation and adaptation:

- Transforming Buildings and Development.
- Reducing emissions from new and existing buildings and building London towards a low-carbon, equitable and inclusive future.
- Transforming Transportation and Mobility.
- Reducing emissions associated with the movement of people and goods.
- Adapting and Making London More Resilient.
- Improving the physical and social resilience of existing community in the face of climate change.

Discussion and Analysis

1.0 Background

1.1 Previous Reports Related to these Matters

Heights Review

- July 16, 2024, London Plan Heights Review (O-9752)

Transit Villages

- July 2023 – Mobility Master Plan Phase 1 Engagement Summary Report Final Report
- December 6, 2022 – Population, Housing and Employment Growth Projection Study. 2021-2051: City of London
- December 6, 2022 – City of London Growth Projection Study
- January 10, 2022 – Z-9408 100 Kellogg Lane
- November 12, 2018 – H-8957 100 Kellogg Lane and 1127 Dundas Street
- April 30, 2018 – Z-8893 100 Kellogg Lane
- October 10, 2017 – OZ-8794 100, 335 And 353 Kellogg Lane, 1063, 1080, 1097, 1127 Dundas Street And 1151 York Street

Shopping Area Place Types

- None.

1.2 Planning History

1.2.1 Housing Accelerator Fund (HAF) and London's Housing Pledge

In April 2023, the Canada Mortgage and Housing Corporation (CMHC) released details on the Housing Accelerator Fund (HAF). The HAF is a \$4 billion incentive program

targeting local municipal governments, with an anticipated outcome of 100,000 additional building permits issued in Canada over a three-year period. The aim of the HAF is to encourage new municipal initiatives that will increase housing supply at an accelerated pace and enhance certainty for developers in the approvals and building permit processes, resulting in transformational change to the housing system.

London's approved HAF application provides a housing target of 2,187 additional units between 2024-2026 for eligibility of up to \$74,058,143 in funding under the HAF. These units must be over and above London's recent unit construction average. The amendments included in this report form part of the HAF initiatives and must be completed within the timelines laid out in the HAF Agreement to ensure future installments of funding will be received.

In 2022 the Province of Ontario assigned London a housing target of 47,000 housing units to be created within 10 years. London accepted that target and pledged to take necessary actions to achieve that goal. Targeted actions to increase London's housing supply were identified and brought to Council in April 2024, and they include updating *The London Plan* to ensure adequate land and policy support is in place to accommodate these new units. The amendments proposed in this report support those actions and will help to achieve London's housing target.

1.2.2 Planning Act Section 26 Official Plan Review

The purpose of a Section 26 review is to ensure that the Official Plan is consistent with provincial plans, has regard to matters of provincial interest (found in section 2 of the *Planning Act*) and is consistent with the *Provincial Policy Statement, 2020*. As of October 20, 2024 the *Provincial Policy Statement, 2020* will be replaced by a new *Provincial Planning Statement, 2024*. Consideration of that new policy direction is also included in the Official Plan update.

The City of London is a single-tier municipality and normally Council is the adopting body and approval authority for official plan amendments. There are instances when it is appropriate or necessary for the Minister of Municipal Affairs and Housing (MMAH) to be the approval authority as detailed above.

Municipalities are mandated under the *Planning Act* (section 26) to periodically update their official plans. The purpose of these official plan reviews is to ensure municipal official plans conform with provincial plans and policies. Although *The London Plan* was approved in 2016, significant changes in population and housing supply have warranted larger scale review and amendments to the Plan. The approval of amendments related to official plan reviews rests with MMAH.

In December 2022, Council approved growth projections for the 2021-2051 time period. Subsequently, an Official Plan Review of *The London Plan* was initiated under Section 26 of the *Planning Act*. Terms of Reference for the Review were presented at a special meeting of Council on April 11, 2023. Noting proposed changes to the Provincial Policy Statement issued by the Province in April 2023, the Official Plan Review was paused in July 2023; however, the Land Needs Assessment component of the review was continued to address housing and land use supply needs.

After consulting with Ministry of Municipal Affairs and Housing (MMAH) staff, the City reinitiated the Section 26 Official Plan Review as a phased review in March 2024. In addition to the amendments related to the Land Needs Assessment, and due to the scope of the proposed changes, MMAH has indicated that the amendments related to the Heights Review, Transit Villages, and Major Shopping Areas should be included as part of the City's Official Plan Review (Phase 2).

1.2.3. The London Plan

In 2016, Council adopted *The London Plan* under the presumption of lower population growth. *The London Plan* originally set a height framework outlining the Minimum, Standard Maximum, and Upper Maximum height for each Urban Place Type, which relied upon the use of the Bonusing provisions previously found under the *Planning Act*. The removal of the bonusing provisions from the *Planning Act*, coupled with the housing crisis, and the provincial governments recent legislation changes, result in the need for updates to *The London Plan*.

1.3 Public and Industry Engagement

On June 14th, 2024, Notice of Application was sent to 2,179 property owners and residents in the surrounding area with regards to the Transit Villages amendment. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on June 6th, 2024. Several "Planning Application" signs were also placed on the sites in late July. There were 45 responses received during this public consultation period. Issues raised include:

- Traffic
- Shadowing
- Not fitting with neighbourhood character (including heritage concerns)
- Longer public consultation needed
- Servicing
- Confusion about zoning vs policy changes

As a result of public feedback, on July 31st, 2024, staff hosted an online Community Information Meeting to provide information on the proposed Transit Villages, as well as updating attendees on the other policy initiatives (Heights Review, Major Shopping Areas, Protected Major Transit Station Area zones). There was a total of 62 attendees at the on-line meeting. Questions from the public included impact on adjacent properties (shadowing etc.), heritage impacts, rationale for determining Transit Village boundaries, lack of transit infrastructure, and the implications of these policy changes.

Revised circulation

On August 7th, 2024, a revised Notice of Application/Notice of Public Meeting was circulated on the combined Heights Review, Transit Villages and Major Shopping Areas amendments. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on August 8th, 2024. There have been 5 responses received. Issues raised include:

- Heights should align with construction realities.
- Neighbourhood Heights framework - a base condition of 8 storeys along Major Streets, increasing to 12 storeys within PTAs and 10 storeys at major intersections.
- Recommend adding stacked townhouses as a permitted use on Neighbourhood Streets.
- Adjust the Oxford/Richmond Transit Village boundary to follow street rights-of-way and extend the southern boundary along Richmond Street for redevelopment opportunities.
- Oppose recommendations on floorplate size, tower separation, setbacks, and other criteria, citing concerns over feasibility, costs, and lack of consultation.
- Further consultation is needed.

Industry and Community Group Discussions

On April 16th, an online focus group discussion with City of London staff was held to discuss the Heights Review. The attendees featured City staff from multiple departments, including Planning Policy, Zoning and Public Property Compliance, Sewer Engineering, the City Solicitor's Office, Development, Site Plan, Planning Implementation, and Long-Range Planning. Staff shared concerns and thoughts on built form requirements and challenges in the planning process for implementing policies.

On April 18th, the City conducted the Customer Service & Process Improvements Reference Group (CSPI) Meeting. Staff then sought written comments from interested individuals representing high-rise developers within London. On May 13th and May 24th, staff and SvN met with representatives from the London Development Institute, London Home Builders' Association, and various developers/representatives. The provided feedback helped direct SvN's research by highlighting several key themes, including:

- The need to consider additional factors, such as viability of approved proposals being built to ensure policies align with market pressures.
- The importance of aligning long-term forecasts with updated growth projections.
- Consideration of different policy frameworks on property valuations.

Discussion was held between the attendees and the project team about the scope of this project. While acknowledging the scope, attendees suggested that other areas, including Neighbourhoods, should also be considered to permit further intensification. The majority of attendees generally agreed that the maximum height provision currently

identified in the The London Plan is not sufficient.

Additional follow up with the development community occurred on July 29th, 2024. At this meeting further information was provided with respect to the Transit Villages and Major Shopping Areas review.

Also on July 29th, 2024, staff met with community association representatives. Comments and questions focused on clarification of the intent of the policy changes, and how policy efforts will eventually integrate with other transit objectives.

2.0 Heights Review

2.1 Policy Context

Provincial Policy Statement, 2020 and Provincial Planning Statement, 2024

The *Planning Act* requires that all municipal land use decisions affecting planning matters shall be consistent with Policy statements issued under Section 2 of the *Act*. the *Provincial Policy Statement, 2020 (2020 PPS)* is currently in force, however on October 20, 2024 the new *Provincial Planning Statement, 2024 (2024 PPS)* will replace it as the provincial policy direction on planning matters. Both the 2020 PPS and 2024 PPS set out high level policy direction for planning across Ontario related to growth, protecting the environment and public health.

Multiple policies within the 2020 PPS support intensification, including:

Healthy, liveable and safe communities are sustained by accommodating an appropriate range and mix of residential types (including additional residential units) (1.1.1.b).

Healthy, liveable and safe communities are sustained by ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs (1.1.1.g).

Appropriate development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety (1.1.3.4).

Planning authorities are also required to “*establish and implement minimum targets for intensification and redevelopment within built-up areas...*” (1.1.3.5).

Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by permitting and facilitating all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3. (1.4.3b).

The 2024 PPS also supports intensification, and includes added language on specific nodes for intensification within Protected Major Transit Station Areas and Strategic Growth Areas:

Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by: promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation (2.2.1.c)

Planning authorities are encouraged to identify and focus growth and development in strategic growth areas. (2.4.1.1)

Planning authorities are encouraged to promote development and intensification within major transit station areas, where appropriate, by:

- a) planning for land uses and built form that supports the achievement of minimum density targets; and*
- b) supporting the redevelopment of surface parking lots within major transit station areas, including commuter parking lots, to be transit-supportive and promote complete communities. (2.4.2.3.b)*

Based on the above noted policies, the amendments are consistent with the *Provincial Policy Statement, 2020* and the *Provincial Planning Statement, 2024*. Through the preparation, adoption and subsequent Ontario Land Tribunal (OLT) approval of *The London Plan*, the City of London has established the local policy framework for the implementation of the Provincial planning policy framework. As such, matters of provincial interest are reviewed and discussed in *The London Plan* analysis below.

The London Plan, 2016

The London Plan sets goals and priorities to shape London's growth, preservation, and evolution of London over the next 20 years (2015 – 2035). *The London Plan* sets a Growth Framework, establishing a plan for shaping growth over the next 20 years.

Chapter 4 of *The London Plan* establishes growth targets that change over time and sets expectations on growth management by promoting a "very compact form of growth." Meanwhile, it reduces energy consumption, decreases air emissions, allows for quality mobility choices, and significantly reduces the consumption of prime agricultural lands. There is an emphasis on growing "inward and upward" to achieve a compact form of development.

With 45% as the intensification target of all new residential development within the Built-Area boundary, the Plan provides direction on the location for intensification. It states that "the most intense form of development will be directed to the Downtown, Transit Villages, and at station locations along the Rapid Transit Corridors, where they can be most effective in meeting multiple objectives of this Plan."

The London Plan includes many policies related to height. Height is an important characteristic not just from an aesthetic perspective, but also as a determining factor that sets the tone for development and the ultimate intensity on a site. The City Building chapter includes many policies related to heights and built form. Policy 287_ states “Within the context of the relevant place type policies, the height of buildings should have a proportional relationship to the width of the abutting public right-of-way to achieve a sense of enclosure”. Several of these policies refer to heights in relation to high-rise buildings and ensuring a good built form.

As identified in Chapter 5, the Place Types establish policies to regulate development. It establishes permitted uses, allowed intensity of development, and built-form for each Place Type. The Place Type policies include regulations and guidance on heights across all urban and rural Place Types. Tables 8 and 9 provide direction on heights for development based on Place Type, including minimum heights, standard heights, and upper maximum heights. These three height categories were previously as a result of bonusing, which allowed for an increase in height or density in return for facilities, services or matters identified in the Plan pursuant to Section 37 of the *Planning Act*. Section 37, however, was repealed and as a result, a restructuring of these tables is necessary.

Part of the analysis to determine appropriate heights was to retain consultants to investigate the best heights to achieve the objectives of *The London Plan*. SvN Architects and Planners (SvN) were retained to undertake this analysis. Their findings were presented to the Planning and Environment Report on July 16, 2024. Based on the findings of that report, the proposed amendments support *The London Plan*’s goals for mixed-use neighbourhoods, close proximity between employment and housing, active transportation opportunities, reducing greenhouse gas emissions, supporting rapid transit ridership, and intensifying development within the Primary Transit Area.

2.2 Proposed Amendments

Amendments relate to changes in the maximum heights permitted within all urban Place Types, primarily the Downtown, Transit Village, Rapid Transit Corridor, Urban Corridor, Major Shopping Area, Shopping Area, Main Street, and Neighbourhoods.

The Maximum permitted building heights are amended to increase opportunities for intensification and redevelopment and support a higher number of dwelling units throughout the City. The approach to planning for building heights is also updated by removing the “standard maximum” and “upper maximum” heights and only using one maximum height for each Place Type. Within the Place Types the heights are amended as shown in the following table.

Place Type	Current Maximum Height	Recommended Maximum Height
------------	------------------------	----------------------------

Downtown	35	45
Transit Village	22	30
Rapid Transit Corridor (near station stops and within Main Street segments)	16	25
Rapid Transit Corridor (all other segments)	12	15
Urban Corridor	10	15
Major Shopping Area (new category)	6	15
Shopping Area	6	8
Main Street	6	8
Neighbourhoods (on Major Streets in the Primary Transit Area)	6	8
Neighbourhoods (on Neighbourhood Connectors in the Primary Transit Area)	3	4

2.3 Discussion and Considerations

As London is experiencing unprecedented growth, implementing the Growth Framework is facing challenges. *The London Plan* has set a height framework outlining the Minimum, Standard Maximum, and Upper Maximum height for each urban Place Type. In recent years, many of London's development applications have exceeded the Upper Maximum height permitted in the existing height framework. Additionally, the current zoning policies are not aligned with the direction set forth by *The London Plan* and cannot provide sufficient direction on the built-form of new developments.

For Downtown areas, the current maximum height permitted is 35 storeys, however, recent applications have requested additional heights ranging from 40 to 53 storeys. For Transit Villages, the current maximum height permitted is 22 storeys; however, recent applications have sought heights in the 25 storeys to 33 storeys range. The current maximum height permitted in Rapid Transit Corridor is 16 storeys if located within 100m

of a station or at the intersection of a Rapid Transit Corridor and Civic Boulevard or Urban Thoroughfare. The maximum height permitted in the rest of the Rapid Transit Corridor area is 12 storeys, and 10 storeys for Urban Corridors. Generally, recent applications within the Rapid Transit Corridor have resulted in developments within the Place Type maximums.

The basis for the recommended heights follows from the report prepared by SvN. The report provided an overview of similar policies in comparable jurisdictions and offered a comparison on those heights with the current maximums permitted in *The London Plan*. The SvN report focused on specific urban Place Types that permitted high-rise development, such as the Downtown, Transit Village, Rapid Transit Corridor, Urban Corridor, and Shopping Area/Major Shopping Area. Independent of the SvN report, Staff have also reviewed the following Place Types and recommended changes to heights, including Main Streets, and Neighbourhoods.

Changes are necessary to the City's growth framework in order to stimulate and support additional housing units. Recent changes to the PPS and the *Planning Act* support policy change to meet the needs of housing

Growth management and intensification is a priority of London's policy framework. Building up and in saves land for environmental conservation, agriculture, aggregates, and recreation. Allowing for greater intensity development not only preserves lands but promotes efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term (2020 PPS 1.1.1. a)), and accommodates an appropriate affordable and market-based range and mix of types and uses to meet the long-term needs of the municipality (2020 PPS 1.1.1 b). The proposed maximum heights are designed to be generous for what is economically viable while still ensuring City design considerations can be implemented.

2.4 Key Issues

2.4.1. Regulations vs. Design Considerations

As part of the SvN report, a series of recommendations to both regulate and guide the development of tall buildings in select urban plan types was provided. The recommendations are broken into two streams – regulation considerations and design considerations. Regulation considerations would be any provisions required through the zoning by-law, like setbacks or height, for example. These types of regulations are also meant to support a higher level of certainty to the development industry and are seen as “standards” for typical development. While the regulation considerations above have been developed in a manner that balances development certainty and approval speed with forms of development appropriate for each Place Type and the City of London's overall vision for the development of the City, there are a number of elements of future development that cannot be adequately addressed as a regulation in zoning. These design considerations tend to relate to more nuanced elements of urban design,

massing and the public realm that require a level of flexibility in application that is not easily addressed via zoning. While the focus here is on minimizing any list of design considerations to support more efficient approval processes along with clearer articulation and assessment of design parameters, it is anticipated that some design considerations will also be necessary to support future development and create a better high-rise development.

During the discussion with the development industry, attendees indicated that built-form provisions may limit development and should only be kept in guidelines as suggestions. Other attendees found some of the provisions reachable and could effectively guide developments.

It is difficult to enforce built-form provisions, such as setback, stepback, and tower floor plate size, if they are not prescribed in the zoning by-law. As per Section 41 of the *Planning Act*, matters regarding pedestrian/vehicular access, landscaping and urban design are managed through the Site Plan Control process. Where design considerations may not be amenable to implementation through the Zoning By-law, some additional provisions may be included within the Site Plan By-law where outcomes would be appropriate City-wide.

The proposed regulations are necessary in order to meet the design policies of *The London Plan* and could be implemented through the new zoning bylaw (ReThink). These include floor area ratios (FAR) to measure intensity, setbacks that help ensure compatibility and separation from adjacent lower rise forms of development, maximum front and exterior yard setbacks at grade that provide a comfortable sense of enclosure of the street, and create an animated street wall, minimum front/exterior setbacks at grade to help ensure building elements like footings, canopies, etc. don't encroach unnecessarily into the right of way, and minimum amenity areas to ensure adequate greenspace for residents.

Additional design considerations that would not be considered as zoning regulations, such as maximum tower floorplates, minimum tower separation and setbacks, ensuring adequate hours of sunlight, stepbacks to create a comfortable human scale and also mitigate downward wind shear, minimum first floor heights, are requested as additional considerations through any site plan application. A recommendation clause has been added to the report to consider these design elements as targets in the review of planning and development applications.

2.4.2 Neighbourhoods Place Type

A concern raised by several representatives of the development community was the current recommendations for the Neighbourhoods Place Type is not sufficient to allow for more intensive development. Several of the comments suggested heights up to 12 storeys along major roads (such as Civic Boulevards or Urban Thoroughfares).

As stated previously, *The London Plan* sets out a growth framework and hierarchy whereby the tallest and most intensive uses are located within the Downtown, with a corresponding decrease in height and intensity within other Place Types. High-rise buildings are generally defined as more than 8 storeys in height.

The London Plan also contains policies on ensuring high-rise and intensive development is located in key strategic areas that are to be the focus for accommodating intensification and higher-density in a more compact built form. Permitting even higher heights (such as 12 storeys) within the Neighbourhoods Place Type can deter units from being provided in key areas that are better served by transit, for instance. The increase in heights to 8 storeys is considered sufficient to allow for increased units without detracting from the larger growth framework.

Part of the rationale for designating Strategic Growth Areas is to identify priority areas for infrastructure and other municipal services. If all areas are prioritized for intensification, then the lack of a strategic vision results in no areas being prioritized. This leads to negative outcomes in terms of efficiency, provision of services, effectiveness of the mobility network, and the ability to allocate services appropriately. Therefore it is important to direct all high-rise development towards Strategic Growth Areas.

3.0 Transit Villages

3.1 Policy Context

Provincial Policy Statement, 2020 and Provincial Planning Statement, 2024

The 2020 PPS includes direction on transit-supportive development to promote both residential and employment developments in more compact efficient forms, while accommodating projected residential needs (1.1.1.e, 1.1.3.3, 1.4.3.e, and 1.8.1.e). The 2020 PPS sets out that settlement areas shall be the focus of growth and development, promotes transit-supportive development, intensification, and infrastructure planning to achieve cost-effective development patterns, optimization of transit-investments, and standards to minimize land consumption and servicing costs (1.1.1.e). The 2020 PPS directs growth and development to settlement areas (1.1.3.1) and within settlement areas, “*Planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas...*” (1.1.3.3). Policy 1.4.3.e provides that municipalities require transit-supportive development and prioritize intensification in proximity to transit, including corridors and stations.

The 2024 PPS builds on this direction and increases specificity by requiring planning authorities to delineate boundaries of Protected Major Transit Station Areas (2.4.2.1) and promoting development and intensification within these areas (2.4.2.3).

Based on the above noted policies, the amendments are consistent with the *Provincial Policy Statement, 2020* and the *Provincial Planning Statement, 2024*.

The London Plan, 2016

The London Plan provides direction to build a mixed-use compact city by:

- Implementing a city structure plan that focuses high-intensity, mixed-use development to strategic locations - along rapid transit corridors and within the Primary Transit Area. (Key Direction #5, Direction 1)
- Sustaining, enhancing, and revitalizing our downtown, main streets, and urban neighbourhoods. (Key Direction #5, Direction 3)
- Mixing stores, restaurants, clean industry, live-work arrangements and services in ways that respect the character of neighbourhoods, while enhancing walkability and generating pedestrian activity. (Key Direction #5, Direction 6)

Two Key Directions of *The London Plan* emphasize the importance of mobility: both to connect London to the surrounding region (Direction #2) as well as placing a new emphasis on creating attractive mobility choices in London (Direction #6).

The London Plan sets out a major goal to invest in necessary infrastructure in those locations where it plans for infill and intensification. Policy 98 of the Plan states that the City will “utilize the Transit Village and Rapid Transit Corridors to create abundant opportunities for growth and development...” and it will “plan and budget for infrastructure improvements necessary to accommodate planned growth within these centres and corridors”.

The subject lands are located within the Primary Transit Area and represent prime candidates for infill and intensification. *The London Plan* identifies the Primary Transit Area, as “a focus of residential intensification and transit investment within London” that “includes the Transit Villages and the Rapid Transit Corridors” (90_). The Plan sets a target stating that 75% of all intensification will be located within the Primary Transit Area” (90_ 3.).

Policy 86 of *The London Plan* indicates that “the most intense forms of development will be directed to the Downtown, Transit Villages and at station locations along the Rapid Transit Corridors, where they can be most effective in meeting multiple objectives of this Plan.”

With 45% as the intensification target of all new residential development within the Built-Area boundary, *The London Plan* provides direction on the location for intensification. It states that “the most intense form of development will be directed to the Downtown, Transit Villages, and at station locations along the Rapid Transit Corridors, where they can be most effective in meeting multiple objectives of this Plan.”

Chapter 4 of *The London Plan* establishes growth targets that change over time and sets expectations on growth management by promoting a “very compact form of growth.” Meanwhile, it reduces energy consumption, decreases air emissions, allows for quality mobility choices, and significantly reduces the consumption of prime agricultural lands. There is an emphasis on growing “inward and upward” to achieve a compact form of development.

The Transit Village policies currently in *The London Plan* denote these areas as exceptionally designed, high-density mixed-use urban neighbourhoods connected by rapid transit to the Downtown and each other. They will be occupied by extensive retail, commercial and office spaces, and will offer entertainment and recreational services as well as public parkettes, plazas and sitting areas. All of this will be tied together with an exceptionally designed, pedestrian-oriented form of development that connects to the centrally located transit station (806). Second only to the Downtown in terms of the mix of uses and intensity of development that is permitted, Transit Villages are major mixed-use destinations with centrally located rapid transit stations. These stations will form focal points to the Transit Village neighbourhood. Transit Villages are connected by rapid transit corridors to the Downtown and allow opportunities for access to this rapid transit from all directions (807). They are intended to support the rapid transit system, by providing a higher density of people living, working, and shopping in close proximity to high-quality transit service. Through pedestrian-oriented and cycling-supported development and design, Transit Villages support a healthy lifestyle and encourage the use of the City’s transit system to reduce overall traffic congestion within the city (808)

The Transit Villages identified in this Plan are located in existing built-up areas. However, all of these locations have opportunities for significant infill, redevelopment, and an overall more efficient use of the land. A more compact, efficient built form is essential to support our transit system and create an environment that places the pedestrian and transit user first (809).

The Mobility Master Plan is a key part of implementing *The London Plan* vision. Conventional public transit and specialized public transit services within London are provided by the London Transit Commission (LTC). Although in active development, the Mobility Master Plan directs how London plans and prioritizes transportation and mobility infrastructure, programs and policies for the foreseeable future. Future mobility planning is critical as the City works toward meeting the demands of a growing population, meeting climate change targets and providing safe, healthy, affordable and accessible mobility options for Londoners to get where they need to go.

This amendment maintains the policy intentions of *The London Plan* by redesignating the lands to a more fitting place type. Given London’s need for more housing, situated along future rapid transit, or in close proximity to existing transit and the Downtown, the Transit Village Place Type would help realize residential and commercial intensification while continuing to support transit ridership along the Rapid Transit Corridor. Both proposed Transit Village sites are well-positioned to support significant intensification, in

keeping with *The London Plan*, and to implement *The London Plan's* goals for the Primary Transit Areas and the Bulit-Area Boundary. As an update to *The London Plan*, new policy considerations must account for the increased population and greater demand for high-density developments. The creation of new Transit Villages serves both the growth in population and jobs.

Zoning By-law Z.-1, 1993

Section 4.19 of London's Zoning By-law includes parking standards for directing developments. Consistent with the proposed creation of the new Transit Villages, an amendment to "Figure 4.19 - Areas Exempt from Minimum Parking Standards" is required.

If developers prioritize other purposes over parking spaces, this encourages greater use of active transportation and public transit. The Zoning By-law exempts Transit Villages from minimum parking standards as these areas are contemplated as mixed-used hubs along the rapid transit network (Figure 4.19). However, the market has still allocated many spaces for parking among the existing Transit Villages.

3.2 Proposed Amendments

The proposed amendments result in the addition of two new Transit Village Place Types in *The London Plan*. Although the Transit Villages will become a part of the Protected Major Transit Station (PMTSA) area, the amendments related to the addition of the Transit Villages have been addressed in this report, whereas the zoning related to these new Transit Village/PMTSA areas has been addressed in the subsequent PMTSA zoning report. Official Plan amendments related to Transit Village/PMTSA policies have also been addressed in the subsequent PMTSA zoning report.

3.2.1 Oxford-Richmond Transit Village

The proposed Transit Village includes lands abutting either respective street for the northern blocks of the Oxford Street East and Richmond Street intersection, excluding 266 Oxford Street East, 757, 759, and 761 Richmond Street and the jut out lane onto St. George Street; the blocks between Oxford Street East and Ann Street, west of St George Street; 100 Ann Street; 180 Ann Street; west of St George Street, the blocks abutting Piccadilly Street to the western edge of Wellington Street, unless south of the train tracks. The proposed boundaries of the Oxford-Richmond Transit Village are shown below in Figure 1.

Through the public engagement process some modifications to the Transit Village Boundary have been made including to reduce the area north of Oxford Street, avoid conflicts with the Bishop Helmuth Heritage Conservation District, and align the east boundary with Wellington Street to allow the right of way to help with the transition into the Neighbourhoods Place Type. Additional site information and context is provided in Appendix "B".

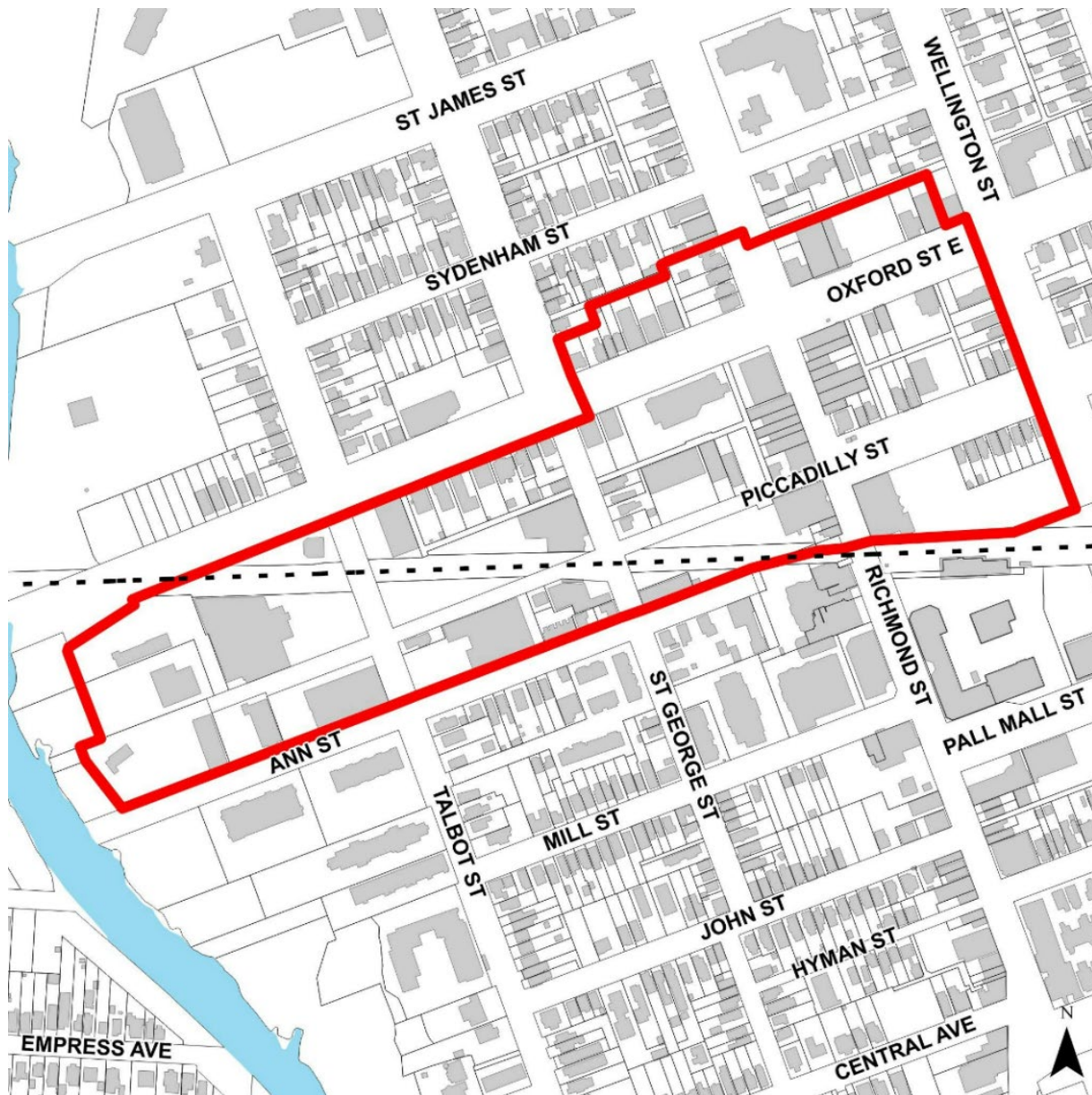


Figure 1. Map of subject lands for the proposed Oxford-Richmond Transit Village.

3.2.2 Dundas-Kellogg Transit Village

100 Kellogg is situated along Dundas Street east of the Western Fair District, bordered by Kellogg Lane and the Old East Village Secondary Plan to the west, and Dundas Street and the McCormick Area Secondary Plan to the west and north.

The proposed Transit Village includes the parcels known municipally as 100 Kellogg Lane, 351 Eleanor Street, 1151 York Street, 1110 Florence Street, 1097 through 1181 Dundas Street, and 1157 through 1170 King Street.

A map of the proposed Transit Village area is shown in Figure 2.

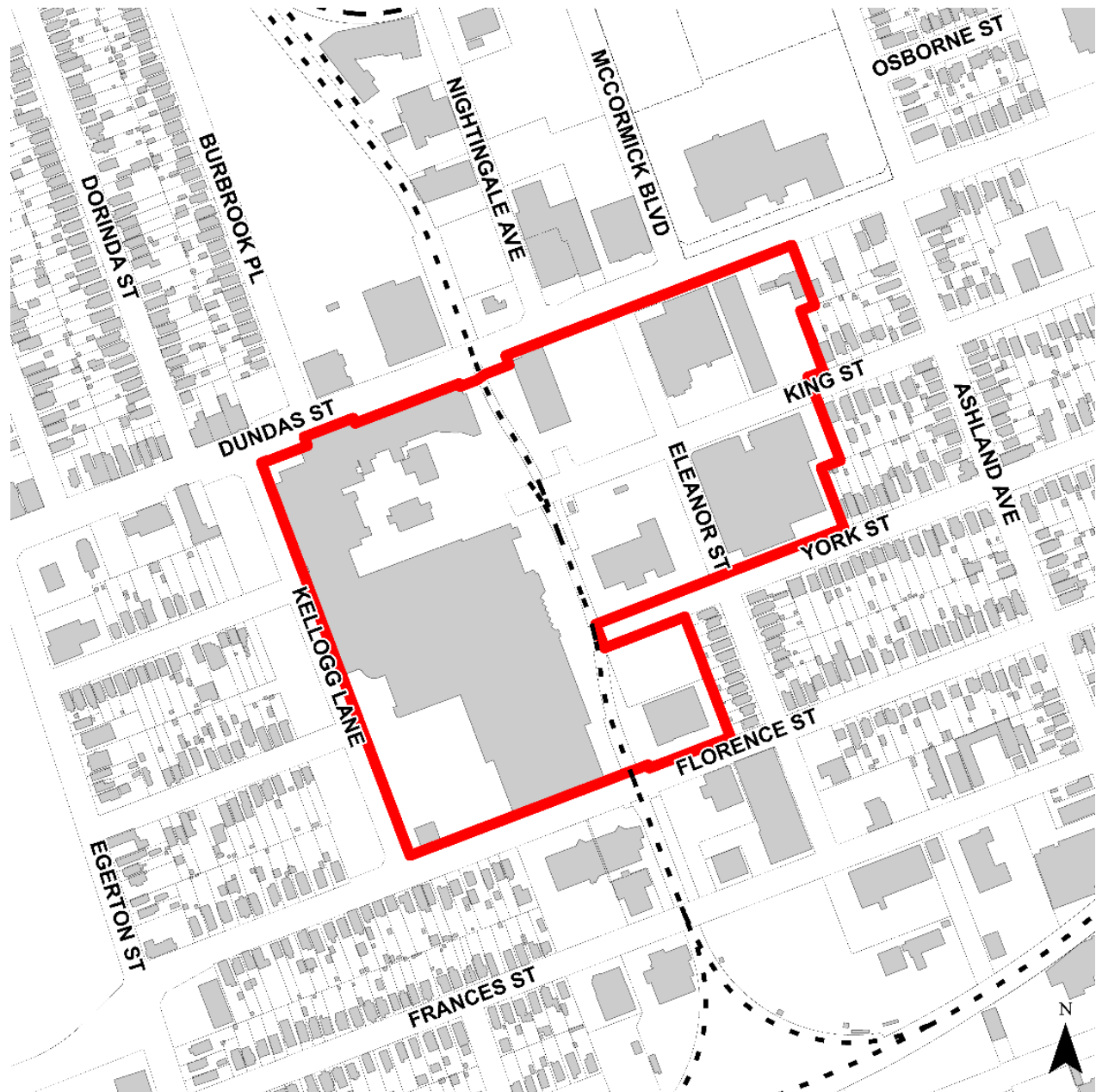


Figure 2. Map of subject lands for the proposed 100 Kellogg Transit Village.

3.3 Discussion and Considerations

The Oxford-Richmond intersection sits at the cross section of several neighbourhoods that serve as a gateway to Downtown. The intersection includes mixed-use development and purpose built commercial and office uses, with several notable bus stops that connect to many different transit lines throughout London.

Although a portion of the proposed Oxford-Richmond Transit Village constitutes a floodplain along the periphery, these lands can still support the goals of the Transit Village. As floodplains have little development potential, the Transit Village Place Type could serve to encourage making these lands complement intensification. For instance,

developers could consolidate the floodplain lands with neighbouring lands to serve as supporting amenity space.

An earlier version of the Oxford-Richmond area showed a larger boundary that extended north. Part of the rationale for the proposed delineation regarded the characteristics of the respective blocks with the option to provide access onto less busy streets. Concern for sensitive neighbouring land uses was raised by area residents. Additionally, the jut out onto St. George Street was a result of using the parcel fabric, which includes a T-shaped laneway parcel. The proposed boundaries were later reduced yet concerns for the northern portion still persist. Regarding the northern portion of the Oxford-Richmond intersection, the western and eastern portion is largely already commercialized, with a mix of office uses, financial establishments, and a supermarket. Additional sites that were heritage designated were removed along the eastern boundary of the area (266 Oxford Street East).

Since 2017, various renovations have occurred within the Dundas-Kellogg area to repurpose these lands as a mixed-use hub. The lands are approximately 7.89 hectares and are comprised of existing commercial industrial areas, non-conforming residential properties, and ongoing redevelopment projects. The former Kellogg's factory lands are now a mixed-use commercial and entertainment district with further redevelopment planned. The proposed conversion recognizes the changed planned function and use. Furthermore, the conversion aligns with strategic housing objectives. The subject lands have little potential for industrial re-use. Former industrial areas have been diversifying to other uses, which are more appropriate and economically pertinent. The Transit Village Place Type will only apply to those lands south of Dundas Street, as the lands located to the north are within the McCormick Secondary Plan area and the Old East Village Secondary Plan.

Both of these amendments would support future higher intensity and mixed-use proposals along the Rapid Transit network. Growth projections since the inception of *The London Plan* have increased rapidly, so the addition of further Transit Villages will help to accommodate greater intensities of development and provide more housing options. Furthermore, these amendments would allow for more ground-level commercial uses that could stimulate the local economy.

3.4 Key Issues

3.4.1 Boundary Delineation

Several comments received through the circulation period question the delineation of the proposed Transit Village Place, especially within the Oxford and Richmond area.

The general area and sites selected were within close proximity to the available transit at the intersection of Richmond and Oxford. Sites on the north side were selected based on their proximity to Oxford Street and ability to consolidate, while the lands south of Oxford Street were selected based on the natural boundaries of Ann Street, the train tracks, and Wellington Street. Some of the uses near the river are currently industrial in

nature, and the hope is that over time, these uses will phase out and more appropriate residential infill will occur. The Kelloggs area has similar circumstances, with industrial uses throughout the area. The hope is that through the redesignation and ultimate zoning, redevelopment to a more compatible form of residential development will occur.

3.4.2 Heritage Conservation

Residents voiced concerns about the impact of higher intensity development with heritage considerations. The Oxford and Richmond Transit Village is in close proximity to the Bishop Hellmuth Heritage Conservation District to the east, West Woodfield Heritage Conservation District to the south, and the Blackfriars-Petersville Heritage Conservation District to the west. In addition to this, there are two heritage designated properties located within the proposed Transit Village area (163 and 165 Oxford Street E) and several listed properties.

Heritage designation – whether on individual properties or in the form of a Heritage Conservation District – helps preserve cultural resources. However, the need for intensification requires a balance with heritage considerations to achieve City policies. New construction can honour and incorporate heritage features to preserve neighbourhood character. Thoughtful treatment of heritage features, especially for street façades, helps integrate heritage into the urban form. For development proposals, professional assessments can also account for archaeological matters, when necessary.

As there are no development proposals associated with these amendments, no Heritage Impact Assessment could be completed prior to the policy change. A Heritage Impact Assessment may be a requirement of development. Furthermore, given the prominence of this area, regardless of heritage status (unlisted, listed, or designated), heritage remains a consideration of any planning application proposal. Heritage staff review and comment on planning applications. The City includes various policies for heritage matters. These will be considered as development applications come forward. *The London Plan* includes additional policies for Transit Villages, such as “*Permitted building heights will step down from the core of the Transit Village to any adjacent Neighbourhoods Place Types*” (813.3.).

3.4.3 Shadowing/Servicing

Comments regarding impact of new development on existing development will be addressed through site plan applications, and the requirement for any shadowing study, as necessary. Policies in *The London Plan*, Site Plan Control By-law, and Zoning By-law, among other policy documents speak to many matters. Large developments are typically subject to Shadow Studies. In practice, a small parcel of land or an especially sensitive parcel may not be appropriate for larger-scale developments.

The City forecasts capacity for servicing infrastructure but if needed, developers may also pay the difference to update existing infrastructure. Development charges also capture the increase in servicing cost for the City. Site Plan Control would also ensure

consideration for more nuanced considerations, such as form, urban design, landscaping, accessibility, amenities, and more.

3.4.4 Traffic and transit

Some comments that were received challenged the need for more Transit Villages, especially in areas where rapid transit is not currently planned.

The London Plan is predicated on a hierarchy of uses and the Mobility Network. Our Rapid Transit Corridors which represent the spine of London's mobility network, connect the Downtown to neighbourhoods, institutions and other employment nodes, centres of culture and commerce, and our urban areas (100). By adding Transit Villages in key areas that can be serviced by existing transit, more residents can locate within these areas, which increases overall populations, and ridership potential for transit. Transit then becomes more viable, which may then necessitate the need to add considerations for rapid transit in key areas.

As part of any high-rise development, a traffic impact assessment may be required to assess the existing network and recommend mitigation, where necessary. With more high-rise development, there is the ability for residents to avail of transit, especially in areas where transit is readily available.

4.0 Strategic Growth Areas and Major Shopping Areas

4.1 Policy Context

Provincial Policy Statement, 2020 and Provincial Planning Statement, 2024

Residential intensification is a key policy directive of the 2020 PPS and 2024 PPS. Planning authorities are encouraged to permit and facilitate residential intensification in order to provide an appropriate range and mix of housing options and densities that meet the projected market-based and affordable housing needs of current and future residents.

The 2020 *PPS* directs growth and development to settlement areas (1.1.3.1) and within settlement areas, "*Planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas...*" (1.1.3.3).

The 2020 *PPS* also requires municipalities to create appropriate development standards that facilitate intensification, redevelopment, and compact built form. Planning authorities are also required to "*establish and implement minimum targets for intensification and redevelopment within built-up areas...*" (1.1.3.5).

The proposed amendments are consistent with the PPS 2020 as multiple policies within the *PPS* support intensification, including:

Healthy, liveable and safe communities are sustained by accommodating an appropriate range and mix of residential types (including additional residential units) (1.1.1.b).

Healthy, liveable and safe communities are sustained by ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs (1.1.1.g).

Appropriate development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety (1.1.3.4).

Planning authorities are also required to “*establish and implement minimum targets for intensification and redevelopment within built-up areas...*” (1.1.3.5).

Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by permitting and facilitating all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3. (1.4.3b).

Based on the above noted policies, the amendments are consistent with the *Provincial Policy Statement (2020)*. Through the preparation, adoption and approval of *The London Plan*, the City of London has established the local policy framework for the implementation of the Provincial planning policy framework. As such, matters of provincial interest are reviewed and discussed in *The London Plan* analysis below.

The proposed *Provincial Planning Statement, 2024* adds the following concept and definition for consideration in municipal official plans:

Strategic growth areas (SGA): means within settlement areas, nodes, corridors, and other areas that have been identified by municipalities to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form.

Strategic growth areas include major transit station areas, existing and emerging downtowns, lands adjacent to publicly assisted post-secondary institutions and other areas where growth or development will be focused, that may include infill, redevelopment (e.g., underutilized shopping malls and plazas), brownfield sites, the expansion or conversion of existing buildings, or greyfields. Lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors may also be identified as strategic growth areas.

Strategic Growth Areas (SGA) are to be the focus of growth and development and support the achievement of complete communities. SGAs are important because they focus high density housing to accommodate significant population and employment growth. Additionally, SGAs are focal areas for education, commercial, recreational, and cultural uses. SGAs will accommodate and support the transit network and provide connection points for inter-and intra-regional transit. They will support affordable, accessible, and equitable housing. The addition of the Major Shopping Area Place Type will meet the intent of this proposed 2024 PPS policy section by '*encouraging the repurposing, reformatting, infill and intensification of existing centres to take advantage of existing services, use land more efficiently, and reduce the need for outward expansion*' (876.4) and permitting a broad range of land uses (877.1). By encouraging a mix of land uses in Major Shopping Areas, these locations will create more '*complete communities*'. Several of the proposed Major Shopping Area Place Type locations have direct public transit service to both post-secondary institutions which could be considered for off-campus housing. Major Shopping Area Place Type permitted uses meet the intent of the redevelopment of commercially-designated retail lands to support mixed-use residential goals.

The London Plan, 2016

In 2016, *The London Plan* created a new Shopping Area Place Type, which included commercial lands previously identified through the 1989 Official Plan. Shopping Areas will constitute an important part of London's complete communities, providing commercial centres with a wide range of retail, service, business, recreational, social, educational, and government uses within easy walking distance for neighbourhoods. Over time, these centres would re-format to become mixed use areas and become more pedestrian, cycling, and transit oriented in their design (871_). Outside of the Downtown, Transit Villages, Rapid Transit Corridors, Urban Corridors and Main Streets, the Shopping Area is the primary Place Type that will allow for commercial uses (873_). Shopping Areas are to service their immediate neighbourhoods and provide a walkable focal point that creates a neighbourhood identity. In some cases, these centres may be very large and serve a much broader population, and may not be directly tied to an individual neighbourhood or community (874_). Shopping Areas are meant to be evenly distributed with flexibility in use and intensification. Repurposing, reformatting and infill of existing locations is encouraged to use the land and infrastructure more efficiently. Mid-rise and high-rise developments will be introduced in some existing locations to intensify their use, promote activity on these sites and strengthen their role as urban nodal centres (876_).

4.2 Proposed Amendments

The proposed amendment would add a new category/Place Type to Map 1 – Place Types of the London Plan. This new category/Place Type, Major Shopping Area, would become a subset of the Shopping Area Place Type, but would permit higher intensity

residential/mixed-use development on certain lands without minimizing its role as a commercial node in the neighbourhood.

Of the 34 Shopping Areas identified on Map 1, 10 of these sites are proposed to be designated as Major Shopping Areas. These include:

1. South side of Fanshawe Park Road West, at Hyde Park Road.
2. Gainsborough Road and Wonderland Road North (Sherwood Forest Mall).
3. Fanshawe Park Road East and Adelaide Street North.
4. Huron Street and Highbury Avenue North.
5. Dundas Street East and Clarke Road.
6. The southeast corner of Commissioners Road East and Highbury Avenue South.
7. The northwest corner of Commissioners Road East and Highbury Avenue South.
8. Wonderland Road South, from north of Pine Valley Boulevard to Bradley Avenue.
9. 755, 765, 775, 785, 795, 805 and 815 Wonderland Road South (Westmount Mall).
10. Oxford Street West and Hyde Park Road.

4.3 Discussion and Considerations

The introduction of Major Shopping Areas within the Shopping Area Place Type was as a result of a review of all 34 Shopping Area Place Type locations based on criteria including:

- Inside the existing built-up area: Lands must be inside the Built Area Boundary to support intensification, as required under the 2024 PPS definition.
- Inside the Primary Transit Area: prioritizing lands that are within the Primary Transit Area or have strong access to existing bus routes or future transit upgrades (or acting as a terminus of one route).
- Excess parking area (amount of parking provided divided by the amount of parking required): This criterion is a function of the new parking standards enacted by By-law Z.-1-223046, passed by Council in August 2022. At some Shopping Areas, the required parking is now half of that at time of development.
- Size of Shopping Area: Smaller land areas do not lend themselves to development as major nodes, while keeping the existing commercial land uses.
- Street Classification: Prioritizing sites located at the intersections of Urban Thoroughfares, Rapid Transit Boulevards, and Civic Boulevards.
- Proximity to Neighbourhood Place Type: Having residential neighbourhoods around the Shopping Area will support its function as a hub for neighbourhood services and amenities.
- Distribution around the City of London: The locations of the Shopping Area Place Types which conform to the criteria were examined on a map. A couple were removed due to proximity with other better candidates, and one was included to

have a better dispersion of locations. This is consistent with policy 876.1 of *The London Plan*.

The intent is to prioritize certain shopping areas which could develop high-intensity residential/mixed use land uses without minimizing its role as a commercial node in the neighbourhood. Shopping Area Place Types vary substantially in size, from the small neighbourhood commercial areas which serve the immediate needs of local residents, to large-scale commercial hubs, which have a regional draw. Therefore, not all the Shopping Area Place Types are suitable for higher-intensity residential development.

The characteristics of the Major Shopping Area on higher order streets (Civic Boulevard, Urban Thoroughfare), well served by public transit (at least two bus routes), with an abundance of underutilized lands, and in proximity to Neighbourhood Place Types translates into prime locations where additional higher-intensity development (up to 15 storeys) could occur. Major Shopping Areas will be consistent with the policies of the Shopping Area Place Type and promote residential land uses at these locations, without diminishing the primary commercial land uses of the Shopping Area Place Type.

Within *The London Plan*, Shopping Areas are characterized by commercial and office land uses, but there is a lot of variety. Some Shopping Areas contain a single retail store, while others are a mix of uses. Several Shopping Areas are exclusively residential. Given this variety, some Shopping Areas are more appropriate for residential intensification than others. The goal of this policy effort is to increase the residential land use component without removing the commercial land use focus.

4.4. Key Issues

4.4.1 Alternative sites

Several requests have been made to consider or include additional sites as Major Shopping Areas. Sites were selected based on criteria as specified in section 4.3. These sites were also selected based on an even distribution of sites across the City. Requests to add additional sites did not meet the criteria and would provide an uneven distribution of Major Shopping Areas.

However, additional policy related to Major Shopping Areas has been included in the proposed Official Plan amendments. The additional policy will allow for opportunities to consider additional sites in the future.

5.0 Next Steps

The timing of the Ministry approval is likely slated for the end of 2024. The Ministry has 120 days to complete its review. Staff will continue to monitor how the new policy framework for heights is being implemented, and after one year from Ministry approval, Staff will initiate a review to determine if further amendments are needed in order to achieve London's Housing Pledge and commitments made under the Housing

Accelerator Fund. In addition, there will be future opportunities to reevaluate Major Shopping Areas based on the finding of the monitoring program.

Conclusion

The policies of *The London Plan* were developed in 2016, and much has changed since this document was adopted. London is experiencing unprecedented growth as one of Ontario's fastest growing city's, and the recent housing crisis has led to a pledge from the City to support more housing. Building in and up preserves land while minimizing servicing cost.

The City is proposing several changes to *The London Plan* to improve our housing supply and affordability. The Heights Review sets out revised building height limits to support development while preserving other City planning objectives. The Transit Village Place Type Amendments support the creation of two new mixed-use communities near transit hubs. The new Major Shopping Areas Place Type enhances commercial areas to support our economy and new housing. Collectively, these efforts can contribute to a more livable, sustainable, and economically vibrant London.

Revising London's heights framework requires a thoughtful examination of *The London Plan's* vision with context of the challenges. An updated heights framework has the potential to optimize land use in a sustainable and appropriate manner in keeping with *The London Plan*. These changes represent an update to London's vision for future growth while maintaining the key principles of The London Plan. The recommended amendments are consistent with the 2020 PPS and 2024 PPS, and represent good planning.

Prepared by: Sarah Baldwin, MCIP, RPP
Senior Planner, Planning Policy (Research)

Stuart Filson, MCIP, RPP
Planner, Planning Policy (Research)

Reviewed by: Nancy Pasato, MCIP, RPP
Manager, Planning Policy (Research)

Justin Adema, MCIP, RPP
Manager, Long Range Planning

Recommended by: Heather McNeely, MCIP, RPP
Director, Planning and Development

Submitted by: Scott Mathers, MPA, P.Eng.
Deputy City Manager, Planning and Economic Development

Appendix A – Phase 2 of Section 26 Official Plan Review

Bill No. (number to be inserted by Clerk's Office)

2024

By-law No. C.P.-XXXX-

A by-law to adopt Phase 2 of the Official Plan Review of *The London Plan, 2016*.

WHEREAS Section 26.(1.1) of the *Planning Act* requires the council of the municipality that has adopted an Official Plan to, not less frequently than ten years after the plan comes into effect, review and revise the Official Plan.

AND WHEREAS the Municipal Council held a special meeting, open to the public, on April 11, 2023 to determine the need to revise the Official Plan.

AND WHEREAS the Municipal Council confirmed the need for a revision and adopted terms of reference for the Official Plan review on April 25, 2023.

AND WHEREAS the Municipal Council held a public meeting on September 10, 2024 for public representations in respect of Phase 2 of the Official Plan review.

NOW THEREFORE the Municipal Council of The Corporation of the City of London enacts as follows:

1. That the Amendments to *The London Plan* constituting Phase 2 of the Official Plan Review of The London Plan under Section 26 of the *Planning Act*, as attached hereto is hereby adopted.
2. That the Clerk of the Municipality is authorized and directed to make application to the Minister of Municipal Affairs for approval of the aforesaid Phase 2 of the Official Plan Review of *The London Plan*, including amendments attached hereto.

PASSED in Open Council on September 24, 2024 subject to the provisions of PART VI.1 of the *Municipal Act, 2001*.

Josh Morgan

Mayor

Michael Schulthess

City Clerk

First Reading – September 24, 2024

Second Reading – September 24, 2024

Third Reading – September 24, 2024

AMENDMENT NO.

to the

OFFICIAL PLAN, THE LONDON PLAN, FOR THE CITY OF LONDON

A. PURPOSE OF THIS AMENDMENT

The purpose of this Amendment is:

1. To amend maximum building heights in all place types;
2. To amend the policies of the Transit Village Place Type to permit and add Transit Villages at the Oxford-Richmond intersection, and surrounding 100 Kellogg Lane;
3. To create and identify Strategic Growth Areas; and
4. To create and identify Major Shopping Areas in policy and on Map 1 – Place Types.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to all lands within the City of London.

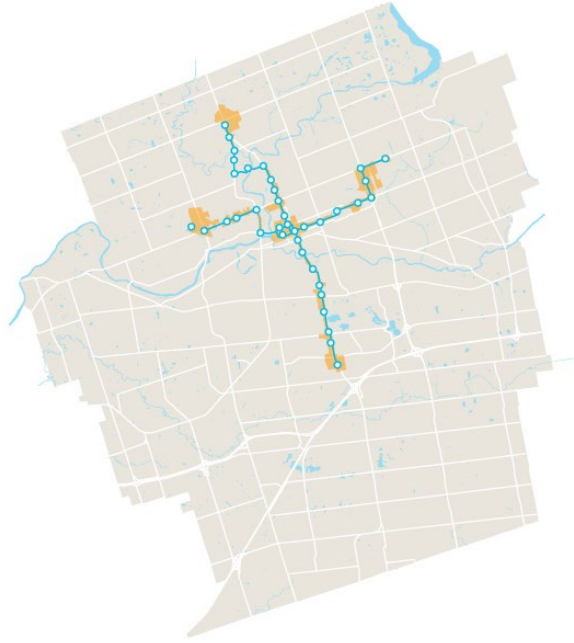
C. BASIS OF THE AMENDMENT

London is experiencing unprecedented growth. These amendments are related to building heights, the creation of new Transit Villages, and identifying new Strategic Growth Areas and Major Shopping Areas and will increase opportunities for housing and economic development. The recommended amendment would increase the permitted housing density throughout the City and specifically in proposed new Transit Villages and Major Shopping Area Place Types, while not diminishing the role of the commercial land uses at these locations.

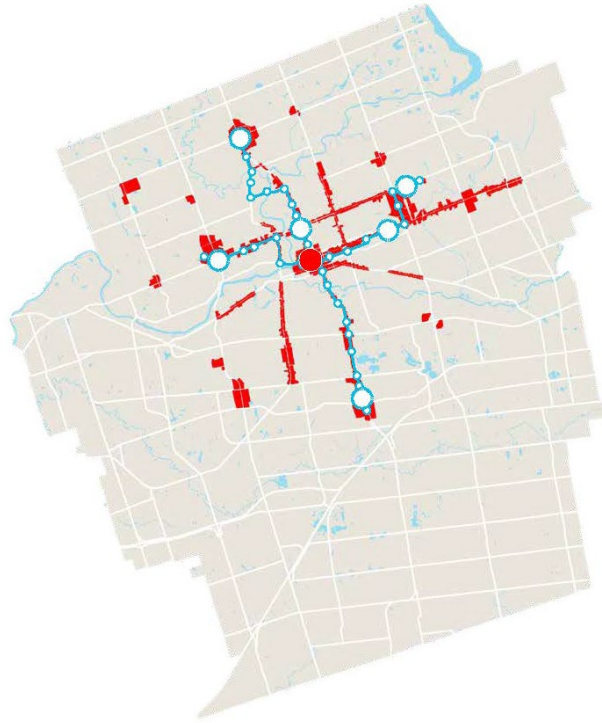
D. THE AMENDMENT

The London Plan for the City of London is hereby amended as follows:

1. Figure 5 graphic is deleted and replaced with the following graphic:



2. Figure 14 title and graphic are deleted and replaced by the following title and graphic:
STRATEGIC GROWTH AREAS



3. Policy 95 is deleted and replaced by the following text:

Figure 5 illustrates major centres that include the Downtown and Transit Villages. While the Downtown is unique and will allow for the greatest level of intensity and broadest range of uses, all of these centres are intended to allow for intense, mixed-use neighbourhoods and business areas with centrally located Rapid Transit Stations. These centres will help to make rapid transit viable in the London we envision for 2035 and will also be planned with a high degree of pedestrian amenity making them great places in which to live, shop, work, and play.

4. A new policy is added as Policy 97B with the following text:
The Downtown, Transit Villages, and Rapid Transit Corridors will, along with the Urban Corridors and Major Shopping Areas, constitute London's strategic growth areas that are planned to be the focus for higher-density intensification and will accommodate significant population and employment growth.
5. Policy 98.2 is deleted and replaced with the following text:
Plan for Transit Villages that support intense forms of mixed-use development.
6. Policy 127 and the heading above Policy 127 are deleted and replaced with the following text:
STRATEGIC GROWTH AREAS
Figure 14 identifies our Downtown, Transit Villages, and Rapid Transit Corridors, Urban Corridors, and Major Shopping Areas as strategic growth areas, which will be economic engines for commerce, employment, and economic growth. These mixed-use centres will be planned to offer a wide array of amenities, services, and experiences. They will offer the highest level of communications infrastructure, smart city services, high-quality walking, cycling and transit environments, and will be serviced by rapid transit. They will be planned to be highly supportive of small, medium and large-scale businesses and will be well connected to our major institutions. High-rise buildings will be directed to strategic growth centres.
7. Policy 129 is deleted and replaced with the following text:
Major Shopping Areas are also shown on Figure 14. These centres provide opportunities to accommodate significant population and employment growth. All Shopping Areas serve the regular needs of those who live near them as well as those who travel to them for

goods and services. These centres may serve as community hubs to provide for a variety of non-commercial services as well.

8. Policy 130 is deleted and replaced with the following text:
The Downtown, Transit Village, Rapid Transit Corridors, Urban Corridor, and Shopping Area Place Type chapters of this Plan provide more detailed policy direction to plan for these strategic growth areas.
9. Figure 20 graphic is deleted and replaced with the following graphic:



10. Policy 816 is amended by adding following text as sub-policy 5:
The projected growth for high density development supports the proposed expansion without detracting from the concentrated urban character of the existing Transit Village Place Types
11. Policy 817 is deleted and replaced with the following text:
It is critical that the identified Transit Villages, and the Rapid Transit Corridors that connect them, are developed intensively to make rapid transit sustainable over the long term. Adding new Transit Villages over the life of this Plan is not required to accommodate forecasted growth and would detract from this key objective as well as the many objectives of this Plan relating to growth management and intensification.

12. Policy 864E and the heading above policy 864E are deleted and replaced with the following text to be added to the Plan as policy 820A:
In the Transit Village Place Type located At 100 Kellogg Lane, 1097 and 1127 Dundas Street, and 351 Eleanor Street, warehouse, wholesale, and self-storage establishments may also be permitted in within existing buildings. Accessory parking in favour of the uses located at 100 Kellogg Lane may be permitted at 1063, 1080, 1097 and 1127 Dundas Street
13. Policy 844.2 is deleted and replaced with the following text:
Richmond Row - Richmond Street from the CP Rail line to Kent Street
14. A new policy as added to the Plan as policy 875A with the following text:
Within the Shopping Area Place Type, certain sites have been identified as Major Shopping Areas. These areas are identified as strategic growth area and may permit higher levels of intensity.
15. Policy 876.5 is deleted and replaced with the following text:
Introduce mid-rise residential development within the Shopping Area Place type, and high-rise mixed-use development within Major Shopping Areas, to intensify their use, promote activity on these sites outside of shopping hours, and strengthen their role as neighbourhood centres
16. Policy 877.2 is deleted and replaced with the following text:
Mixed-use buildings will be encouraged. Commercial and neighbourhood service uses will be required as part of any Shopping Area redevelopment in order to establish and preserve the Shopping Area's function as a neighbourhood hub
17. Policy 878.2 is deleted and replaced with the following text:
Buildings within the Shopping Area Place Type will be a maximum height of eight storeys, or, in Major Shopping Areas the maximum height is 15 storeys.
18. A new policy as added to the Plan as policy 881A with the following text:
Applications to expand existing Major Shopping Areas or identify new Major Shopping Areas will be evaluated using the Planning and

Development Application policies in the Our Tools part of this Plan, in addition to the following:

1. New Major Shopping Area Place Types will be permitted only at the intersection of two streets classified as Civic Boulevard or Urban Thoroughfare.
 2. Applications for new or expanded Major Shopping Area Place Types will be required to clearly demonstrate the need for the proposed new Major Shopping Area or the proposed expansion onto additional lands, considering all other opportunities for commercial development or redevelopment that have been planned. This will include a review of the opportunities that have been created at appropriate locations in the form of vacant land, vacant space in existing buildings, and expansion, redevelopment and intensification opportunities on existing commercial sites.
 3. Applications for new Major Shopping Areas will be required to demonstrate that the proposed Major Shopping Area will not undermine or detract from the planned function of an existing Shopping Area or any other place type shown in the City Structure Plan and on Map 1.
 4. New or expanded Major Shopping Areas will not be permitted if they take on a linear configuration, rather than a nodal configuration.
 5. The projected growth for high density development supports the proposed expansion without detracting from the concentrated urban character of the existing Transit Village Place Types.
 6. New Major Shopping Areas will be permitted only within the Built Area Boundary.
 7. Applications for new Major Shopping Areas will be supported by an analysis of existing and planned infrastructure to confirm that capacity exists to support the increased level of intensity and does not detract from other strategic growth areas
19. Policy 910.4 is deleted and replaced with the following text:
Buildings within the Main Street Place Type will be a minimum of either two storeys or eight metres in height and a maximum of eight storeys.
20. Policy 921 is deleted and replaced with the following text:

Table 10 - Range of Permitted Uses in Neighbourhoods Place Type, shows the range of permitted uses that may be allowed within the Neighbourhoods Place Type, by street classification

21. Policy 1018 is deleted and replaced with the following text:
Lands outside of the Transit Village Place Type within the St. George/Grosvenor Neighbourhood, bounded by Waterloo Street on the east, Oxford Street West on the south, the Thames River on the west, and Victoria Street on the north, will remain a predominantly low density, low-rise residential area despite continual redevelopment pressure for apartment buildings, expansions to existing hospitals, and office conversions.
22. Policy 1021 is deleted and replaced with the following text:
For the lands outside of the Transit Village Place Type on the north side of Oxford Street East, between the Thames River and Waterloo Street and on Richmond Street, between Oxford Street East and Sydenham Street, the height and density of residential buildings will be controlled by the Zoning By-law to permit only mid-rise development which will provide a transition between largescale development in the Richmond Row Rapid Transit Corridor and the low density, residential dwellings of the St. George/Grosvenor Neighbourhood. Mid-rise office development will also be permitted on the lands identified as High Density Residential Overlay (from 1989 Official Plan) on Map 2. Secondary uses permitted in this area will exclude commercial recreation facilities. Convenience commercial uses may be permitted on the ground floor of new apartment and/or office buildings
23. Policy 1086.1 is deleted and replaced with the following text:
Buildings within the Institutional Place Type will be a minimum of either two storeys or eight metres in height and a maximum of 15 storeys in height.
24. Policy 1132A is deleted.
25. Policy 1638 and the heading above policy 1638 are deleted and replaced with the following text:
ZONING TO THE MAXIMUM HEIGHT
The framework of permitted building heights is summarized on Table 8 at the beginning of the Urban Place Type policies. Zoning on individual sites may limit building heights below the maximum listed in the applicable Place Type. An application to increase the maximum

height in the Zoning by-law will be reviewed on a site-specific basis. Applications for heights exceeding the maximum of the applicable Place Type will require an amendment to this Plan and the addition of a new specific area policy.

26. Policy 1639 is deleted.
27. Policy 1640 is deleted and replaced with the following text:
In order to provide certainty and to ensure that the features required to mitigate the impacts of the additional height and densities are provided, a site-specific zoning by-law amendment will ensure that measures will be implemented to mitigate any impacts of additional height or density.
28. Policy 1641 is deleted and replaced with the following text:
Applications to increase the maximum building height may be permitted where the resulting intensity and form of the proposed development represents good planning within its context.
29. Policy 1795 is amended by adding the following definition:
Strategic Growth Area means an area within the City that has been identified to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form.
30. Table 8 is deleted and replaced with the following table, including notes:

Place Type	Minimum Height (storeys or m)	Maximum Height (storeys)	Condition
Downtown	3 storeys or 9m	45	
Transit Village	2 storeys or 8m	30	
Rapid Transit Corridor	2 storeys or 8m	25	Properties located on a Rapid Transit Corridor within 150m of the Transit Station or properties at the intersection of the Rapid Transit Corridor and Civic Boulevard and Urban Thoroughfare
	2 storeys or 8m	15	Other properties on a Rapid Transit Corridor
Urban Corridor	2 storeys or 8m	15	
Shopping Area	1 storey or 2 storeys for residential uses	15	Major Shopping Areas
	1 storey or 2 storeys for residential uses	8	
Main Street	2 storeys or 8m	8	
Neighbourhoods	See Neighbourhoods policies & tables		
High Density Residential Overlay (from 1989 Official Plan)	2 storeys	12 (outside of the Primary Transit Area) or 14 (inside the Primary Transit Area)	See High Density Residential Overlay (from 1989 Official Plan) policies for greater detail.
Institutional	2 storeys or 8m	15	
Industrial	1 storey	2	Commercial Industrial Place Type only.

Note 1 - The heights shown in this table will not necessarily be permitted on all sites within the relevant place type.

Note 2 - Where more specific policies exist in this Plan relating to height for an area or specific site, these more specific policies shall prevail; readers should consult all the policies of this chapter, Map 7 which shows specific policy areas and Secondary Plans to identify applicable specific policies.

31. Table 9 is deleted and replaced with the following table, including notes

Table 9 – Maximum Height in the Rapid Transit and Urban Corridor Place Types

Place Type	Minimum Height (storeys or m)	Maximum Height (storeys)	Condition
Rapid Transit Corridor	2 storeys or 8m	<u>25</u>	<u>Properties located on a Rapid Transit Corridor within 150m of rapid transit stations or properties at the intersection of a Rapid Transit Corridor and a Civic Boulevard or Urban Thoroughfare</u>
	2 storeys or 8m	<u>15</u>	<u>Other properties on a Rapid Transit Corridor</u>
Urban Corridor	2 storeys or 8m	<u>15</u>	

Note 1 – The heights shown in this table will not necessarily be permitted on all sites within the Rapid Transit and Urban Corridor Place Types.

Note 2 – Where more specific policies exist in this Plan relating to height for an area or specific site, these more specific policies shall prevail; readers should consult all the policies of this chapter, Map 7 which shows specific policy areas and Secondary Plans to identify applicable specific policies.

32. Table 10 is deleted and replaced with the following table, including notes

Table 10 – Permitted Range of Uses in the Neighbourhoods Place Type

Street onto which property has frontage	Range of primary permitted uses	Additional permitted uses at intersections conditional on classification of intersecting street			Additional permitted uses
		Neighbourhood Street	Neighbourhood Connector	Civic Boulevard and Urban Thoroughfare	
Neighbourhood Street	• Single detached	N/A	N/A	N/A	Fronting onto Park N/A

	<ul style="list-style-type: none"> • Semi-detached • Multiplex up to 4 units • Converted dwellings • Townhouses • Additional residential units • Home occupations • Group homes 				
Neighbourhood Connector	<p>As per Neighbourhood Street plus:</p> <ul style="list-style-type: none"> • Small-scale community facilities <p>Only in Primary Transit Area</p> <ul style="list-style-type: none"> • Stacked townhouse • Apartments 	N/A	<ul style="list-style-type: none"> • Mixed-use buildings • Stacked townhouses • Apartments 	<ul style="list-style-type: none"> • Mixed-use buildings • Stacked townhouses • Apartments 	<ul style="list-style-type: none"> • Mixed-use buildings • Stacked townhouses • Apartments
Civic Boulevard and Urban Thoroughfare	<p>As per Neighbourhood Connector plus:</p> <ul style="list-style-type: none"> • Stacked townhouses • Apartments • Emergency care establishments • Rooming houses • Supervised correctional residences 	N/A	<ul style="list-style-type: none"> • Mixed-use buildings 	<ul style="list-style-type: none"> • Mixed-use building • Stand-alone retail, service, office 	N/A

Note 1 - The full range of uses shown in this table will not necessarily be permitted on all sites within the Neighbourhoods Place Type

Note 2 – Where more specific policies exist in this Plan relating to permitted uses for an area or specific site, these more specific policies shall prevail, readers should consult all the policies of this chapter, Map 7 which shows specific policy areas, and the Secondary Plans part of this Plan to identify applicable specific policies.

33. Table 11 is deleted and replaced with the following table, including notes

Table 11 – Range of Permitted Heights in Neighbourhoods Place Type

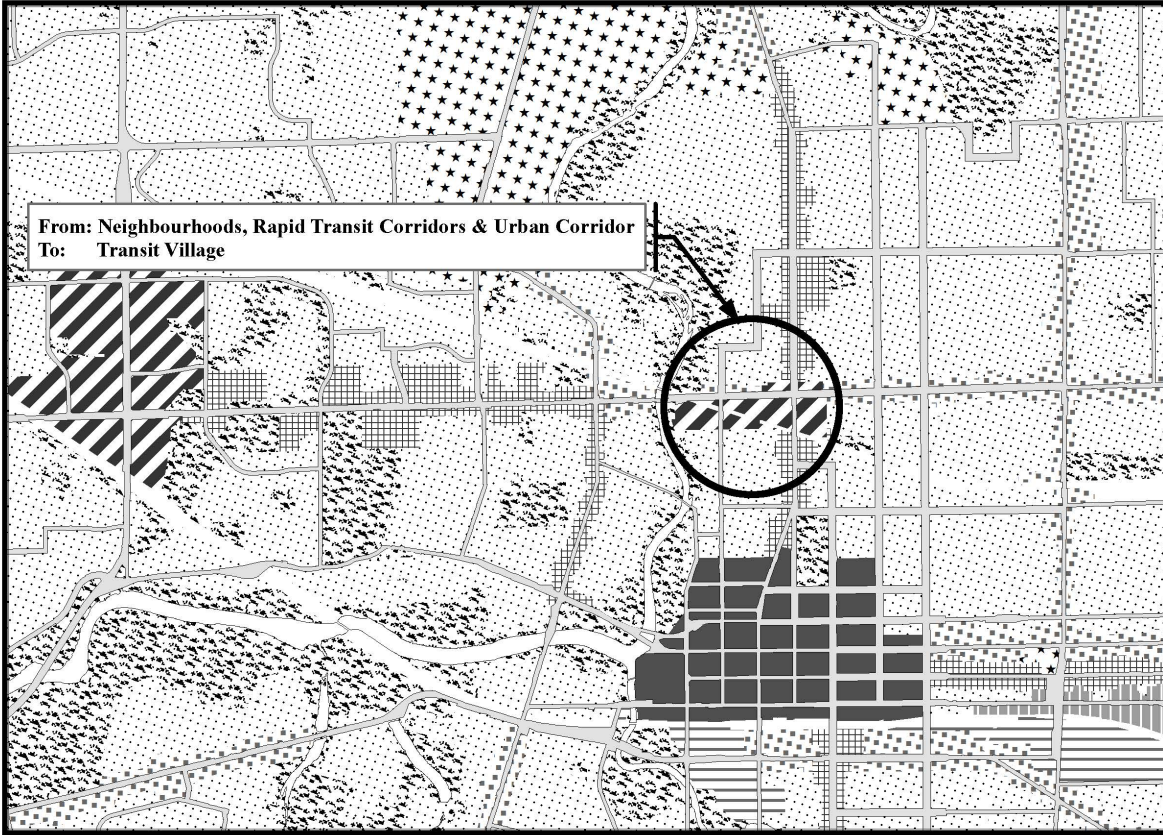
Street onto which property has frontage	Minimum and maximum heights (storeys) that may be permitted along this classification of street (Base condition)		Minimum and maximum height (storeys) that may be permitted conditional upon classification of intersecting street		Minimum and maximum height (storeys) that may be permitted conditional upon fronting onto park
		Neighbourhood Street	Neighbourhood Connector	Civic Boulevard and Urban Thoroughfare	Fronting onto Park
Neighbourhood Street	Min. 1 Max. 3	Same as base	Same as base	Same as base	Same as base
Neighbourhood Connector	Min. 1 Max. 3 Max. 4 in Primary Transit Area	Same as base	Min. 2 Max. 4 Max. 6 in Primary Transit Area	Min. 2 Max. 6 Max. 8 in Primary Transit Area	Min. 2 Max. 4
Civic Boulevard and Urban Thoroughfare	Min. 2 Max. 6 Max. 8 in Primary Transit Area	Same as base	Same as base	Min. 2 Max 8	Same as base

Note 1 – The heights shown in this table will not necessarily be permitted on all sites within the Neighbourhoods Place Type

Note 2 – Where more specific policies exist in this Plan relating to height for an area or specific site, these more specific policies shall prevail; readers should consult all the policies of this chapter, Map 7 which shows specific policy areas and Secondary Plans to identify applicable specific policies.

34. Map 1 – Place Types is amended as indicated on “Schedule 1” attached hereto, by adding a Transit Village for the lands situated at and surrounding the Oxford-Richmond intersection in the City of London.
35. Map 1 – Place Types is amended as indicated on “Schedule 2” attached hereto, by:
 1. Adding a new item to the Legend called “Major Shopping Area”.
 2. Changing the lands at Hyde Park Road/Fanshawe Park Road West from Shopping Area to Major Shopping Area.

3. Changing the lands at Wonderland Road North/Gainsborough Road (Sherwood Forest Mall) from Shopping Area to Major Shopping Area.
 4. Changing the lands at Adelaide Street North/Fanshawe Park Road East from Shopping Area to Major Shopping Area.
 5. Changing the lands at Highbury Avenue North/Huron Street (Northland Mall) from Shopping Area to Major Shopping Area.
 6. Changing the lands at Clarke Road/Dundas Street (Argyle Mall) from Shopping Area to Major Shopping Area.
 7. Changing the lands at Highbury Avenue North/Commissioners Road East (southeast corner) from Shopping Area to Major Shopping Area.
 8. Changing the lands at Highbury Avenue North/Commissioners Road East (northwest corner) NW from Shopping Area to Major Shopping Area.
 9. Changing the lands at Wonderland Road South from north of Pine Valley Boulevard to Bradley Avenue West from Shopping Area to Major Shopping Area.
 10. Changing the lands at Wonderland Road South/Viscount Road (Westmount Mall) from Shopping Area to Major Shopping Area.
 11. Changing the lands at Hyde Park Road/Oxford Street West from Shopping Area to Major Shopping Area.
36. Map 7 – Specific Policy Areas is amended as indicated on “Schedule 3” attached hereto, by adding a Transit Village for the lands situated at and surrounding the Oxford-Richmond intersection in the City of London.

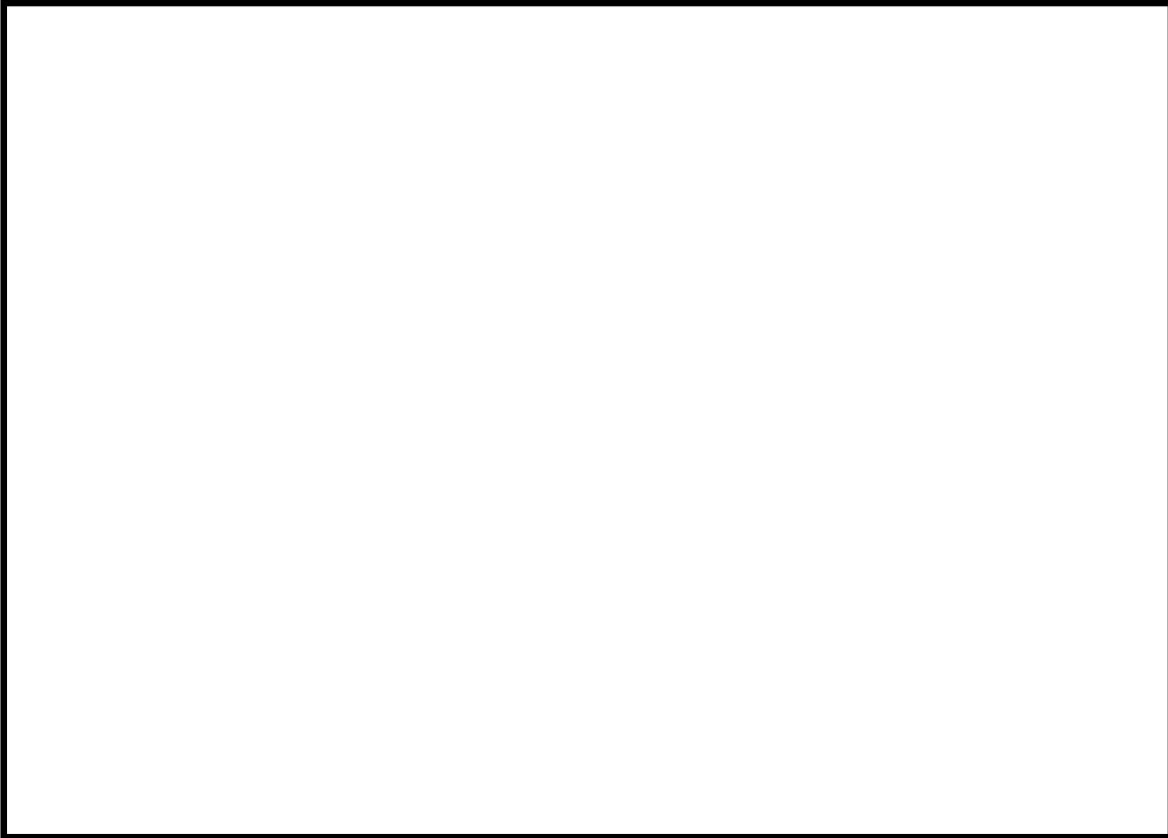


Legend





















Downtown	Future Community Growth	Environmental Review
Transit Village	Heavy Industrial	Farmland
Shopping Area	Light Industrial	Rural Neighbourhood
Rapid Transit Corridor	Future Industrial Growth	Waste Management Resource Recovery Area
Urban Corridor	Commercial Industrial	Urban Growth Boundary
Main Street	Institutional	
Neighbourhood	Green Space	

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

<p align="center">SCHEDULE 1 TO</p> <p>OFFICIAL AMENDMENT NO. _____</p> <p align="center">PREPARED BY: Planning & Development</p>	<p align="center"> Scale 1:30,000 Meters </p>	<p>FILE NUMBER: OZ-9726</p> <p>PLANNER: SF</p> <p>TECHNICIAN: RC</p> <p>DATE: 8/23/2024</p>
---	--	---



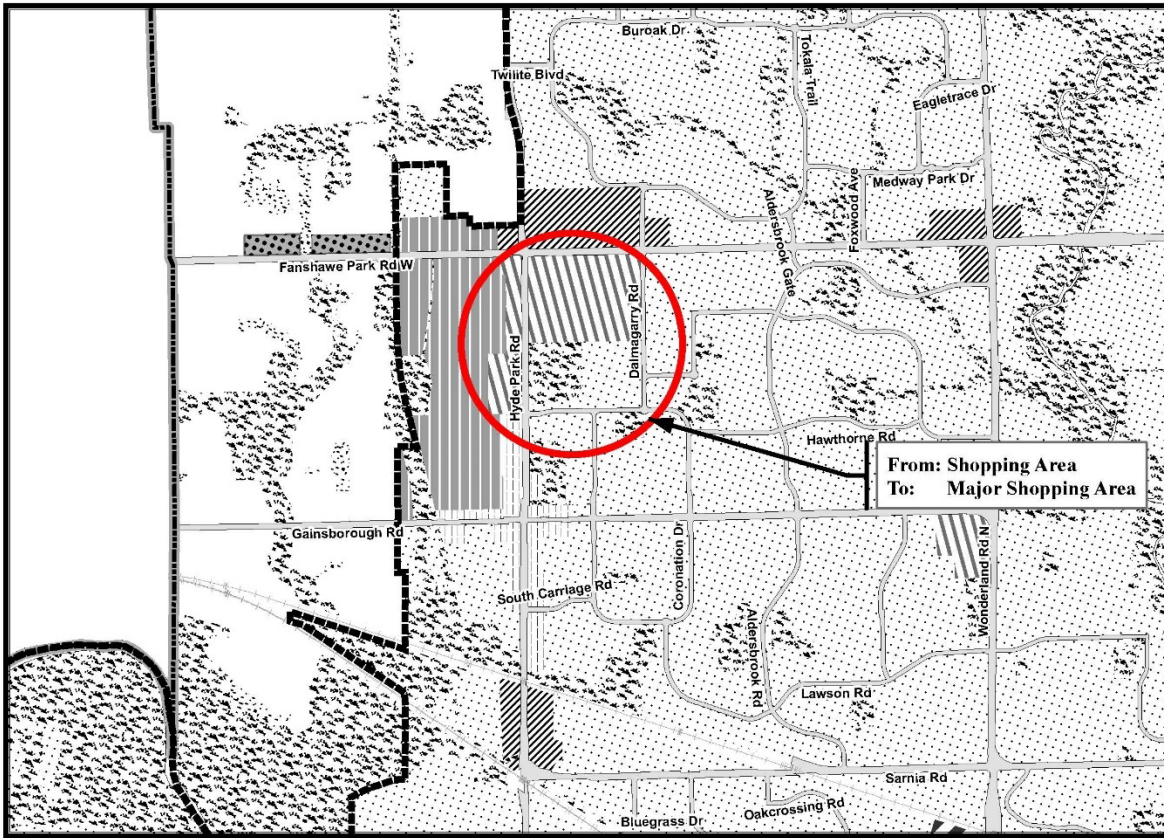
Legend

 Downtown	 Neighbourhood	 Green Space
 Transit Village	 Future Community Growth	 Environmental Review
 Shopping Area	 Heavy Industrial	 Farmland
 Major Shopping Area	 Light Industrial	 Rural Neighbourhood
 Rapid Transit Corridor	 Future Industrial Growth	 Waste Management Resource Recovery Area
 Urban Corridor	 Commercial Industrial	 Urban Growth Boundary
 Main Street	 Institutional	

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

<p>SCHEDULE 2-1 TO</p> <p>OFFICIAL AMENDMENT NO. _____</p> <p>PREPARED BY: Planning & Development</p>	<p>Scale 1:30,000</p>	<p>FILE NUMBER: O-9753</p> <p>PLANNER: SB</p> <p>TECHNICIAN: JI</p> <p>DATE: 8/23/2024</p>
--	-----------------------	--

AMENDMENT NO:



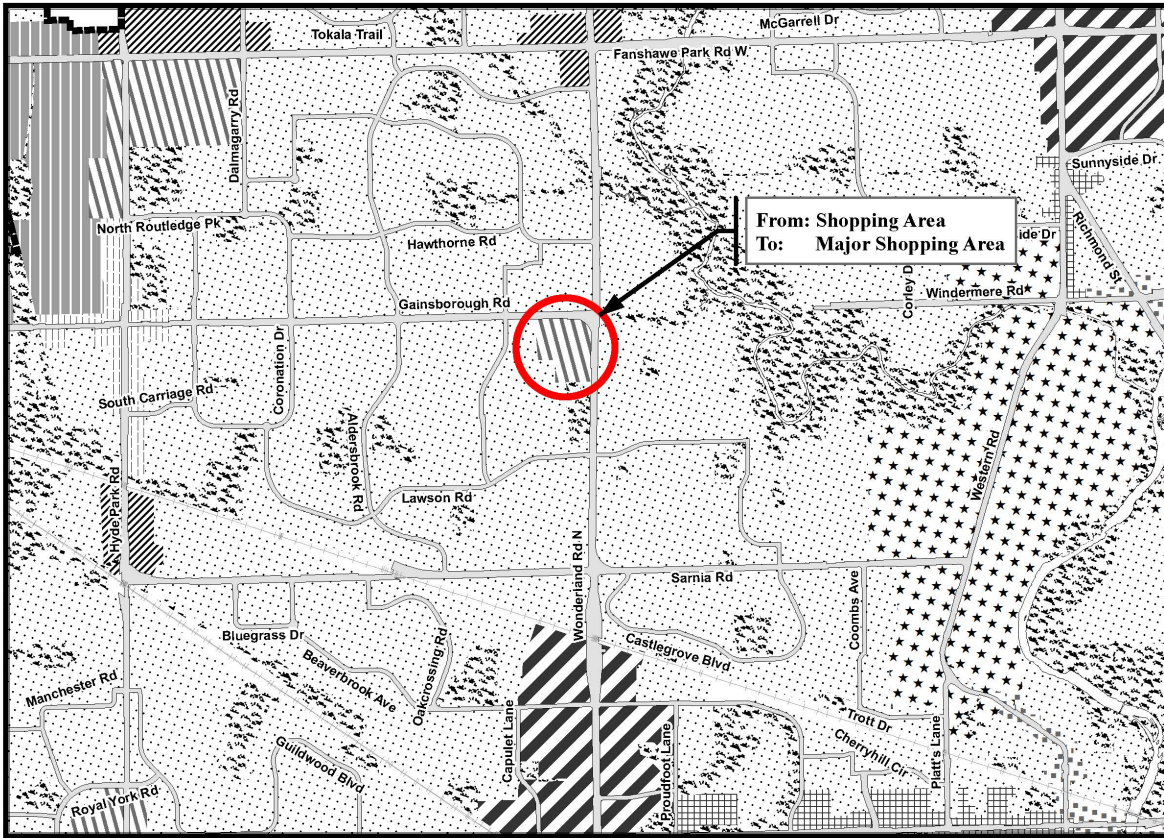
Legend

Downtown	Neighbourhood	Green Space
Transit Village	Future Community Growth	Environmental Review
Shopping Area	Heavy Industrial	Farmland
Major Shopping Area	Light Industrial	Rural Neighbourhood
Rapid Transit Corridor	Future Industrial Growth	Waste Management Resource Recovery Area
Urban Corridor	Commercial Industrial	Urban Growth Boundary
Main Street	Institutional	

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

<p>SCHEDULE 2-2 TO</p> <p>OFFICIAL AMENDMENT NO. _____</p> <p>PREPARED BY: Planning & Development</p>	<p>Scale 1:30,000</p> <p>Meters</p>	<p>FILE NUMBER: O-9753</p> <p>PLANNER: SB</p> <p>TECHNICIAN: JI</p> <p>DATE: 8/23/2024</p>
---	-------------------------------------	--

AMENDMENT NO:



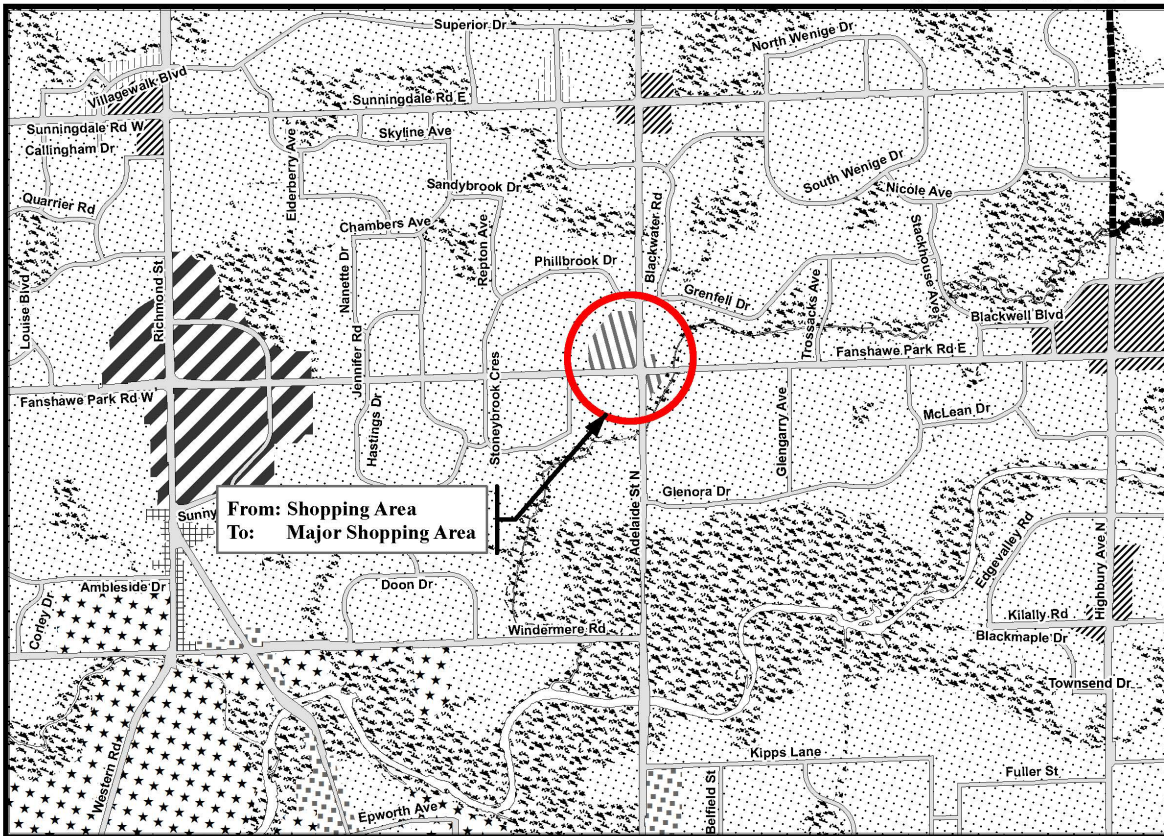
Legend

- | | | |
|------------------------|--------------------------|---|
| Downtown | Neighbourhood | Green Space |
| Transit Village | Future Community Growth | Environmental Review |
| Shopping Area | Heavy Industrial | Farmland |
| Major Shopping Area | Light Industrial | Rural Neighbourhood |
| Rapid Transit Corridor | Future Industrial Growth | Waste Management Resource Recovery Area |
| Urban Corridor | Commercial Industrial | Urban Growth Boundary |
| Main Street | Institutional | |

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

<p align="center">SCHEDULE 2-3 TO OFFICIAL AMENDMENT NO. _____</p> <p align="center">PREPARED BY: Planning & Development</p>	<p align="center"> Scale 1:30,000 Meters </p>	<p>FILE NUMBER: O-9753</p> <p>PLANNER: SB</p> <p>TECHNICIAN: JI</p> <p>DATE: 8/23/2024</p>
---	--	--

AMENDMENT NO:



From: Shopping Area
To: Major Shopping Area

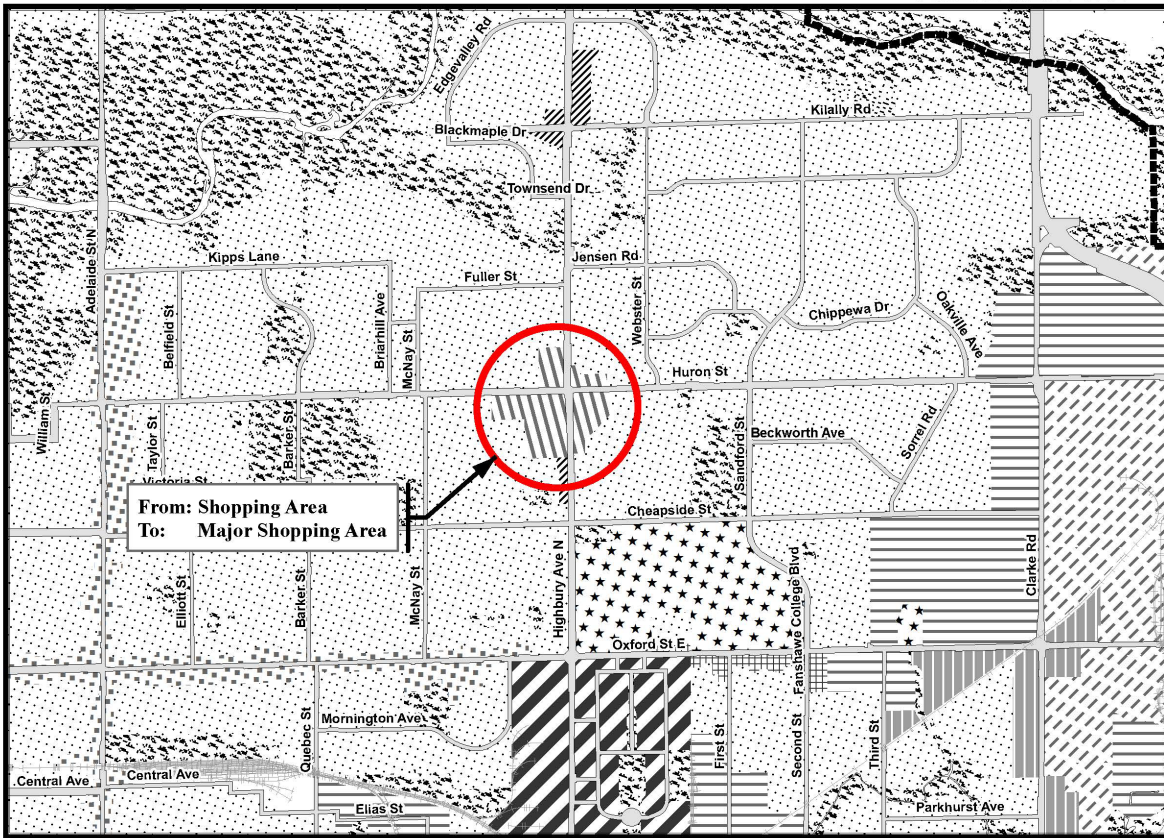
Legend

- | | | |
|------------------------|--------------------------|---|
| Downtown | Neighbourhood | Green Space |
| Transit Village | Future Community Growth | Environmental Review |
| Shopping Area | Heavy Industrial | Farmland |
| Major Shopping Area | Light Industrial | Rural Neighbourhood |
| Rapid Transit Corridor | Future Industrial Growth | Waste Management Resource Recovery Area |
| Urban Corridor | Commercial Industrial | Urban Growth Boundary |
| Main Street | Institutional | |

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

<p align="center">SCHEDULE 2-4 TO</p> <p>OFFICIAL AMENDMENT NO. _____</p> <p align="center">PREPARED BY: Planning & Development</p>	<p align="center"> Scale 1:30,000 Meters </p>	<p>FILE NUMBER: O-9753</p> <p>PLANNER: SB</p> <p>TECHNICIAN: JI</p> <p>DATE: 8/23/2024</p>
---	--	--

AMENDMENT NO:



From: Shopping Area
To: Major Shopping Area

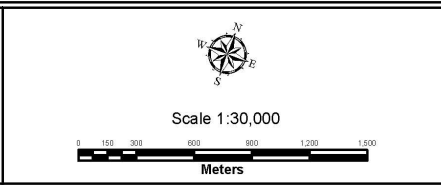
Legend

- | | | | | | |
|--|------------------------|--|--------------------------|--|---|
| | Downtown | | Neighbourhood | | Green Space |
| | Transit Village | | Future Community Growth | | Environmental Review |
| | Shopping Area | | Heavy Industrial | | Farmland |
| | Major Shopping Area | | Light Industrial | | Rural Neighbourhood |
| | Rapid Transit Corridor | | Future Industrial Growth | | Waste Management Resource Recovery Area |
| | Urban Corridor | | Commercial Industrial | | Urban Growth Boundary |
| | Main Street | | Institutional | | |

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

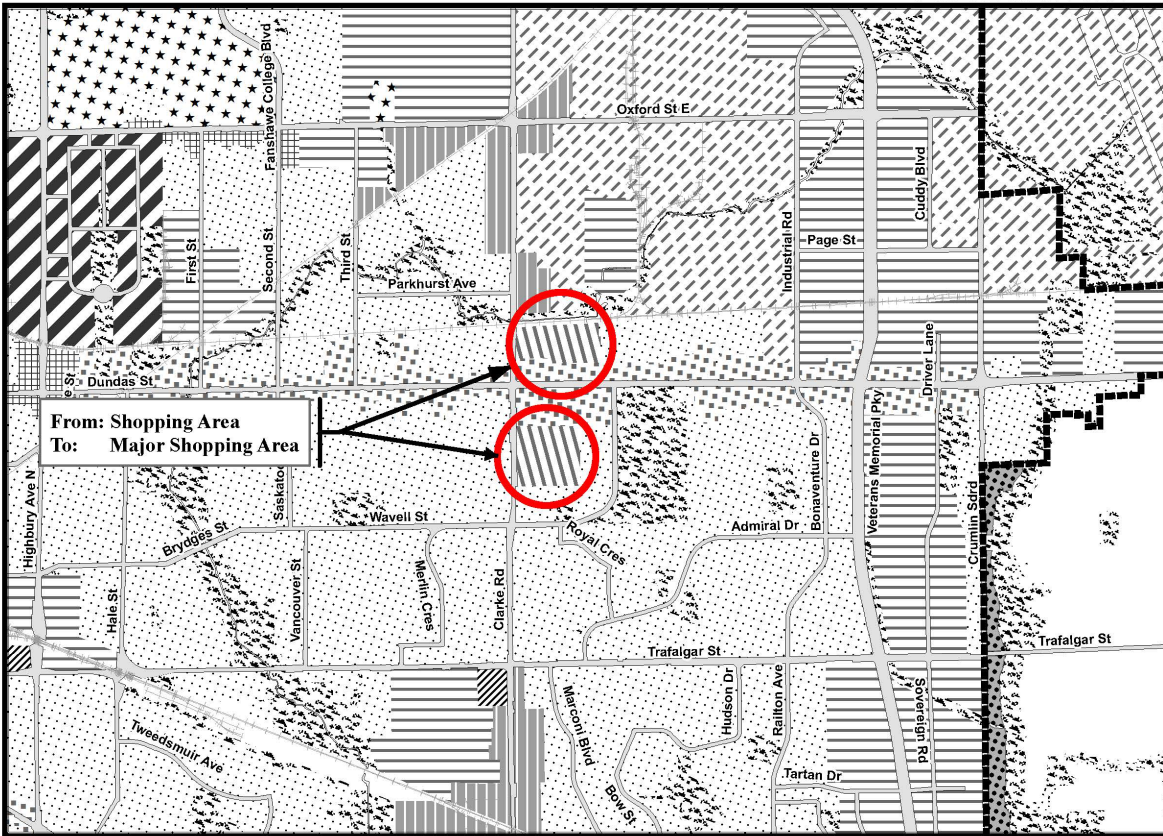
**SCHEDULE 2-5
TO
OFFICIAL AMENDMENT NO. _____**

PREPARED BY: Planning & Development



FILE NUMBER: O-9753
PLANNER: SB
TECHNICIAN: JI
DATE: 8/23/2024

AMENDMENT NO:



From: Shopping Area
To: Major Shopping Area

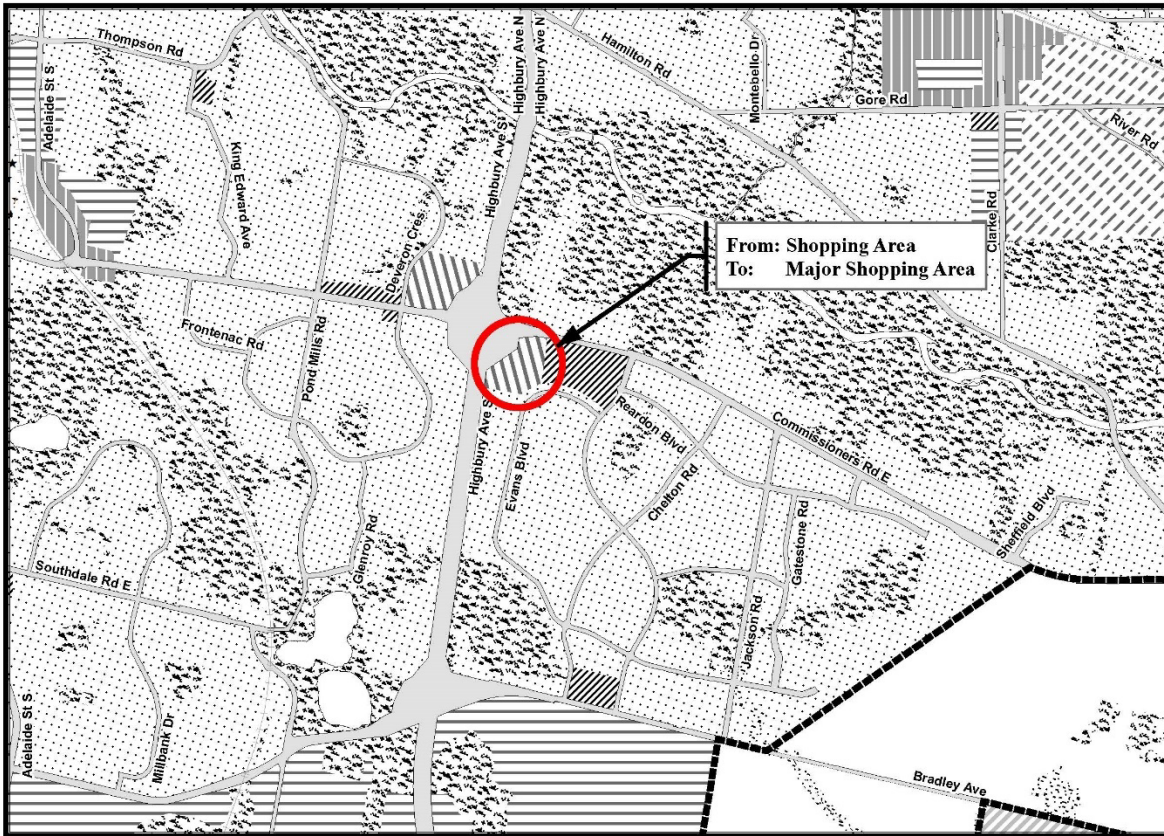
Legend

- | | | | | | |
|--|------------------------|--|--------------------------|--|---|
| | Downtown | | Neighbourhood | | Green Space |
| | Transit Village | | Future Community Growth | | Environmental Review |
| | Shopping Area | | Heavy Industrial | | Farmland |
| | Major Shopping Area | | Light Industrial | | Rural Neighbourhood |
| | Rapid Transit Corridor | | Future Industrial Growth | | Waste Management Resource Recovery Area |
| | Urban Corridor | | Commercial Industrial | | Urban Growth Boundary |
| | Main Street | | Institutional | | |

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

<p align="center">SCHEDULE 2-6 TO OFFICIAL AMENDMENT NO. _____</p> <p align="center">PREPARED BY: Planning & Development</p>	<p align="center"> Scale 1:30,000 Meters </p>	<p>FILE NUMBER: O-9753</p> <p>PLANNER: SB</p> <p>TECHNICIAN: JI</p> <p>DATE: 8/23/2024</p>
---	--	--

AMENDMENT NO:



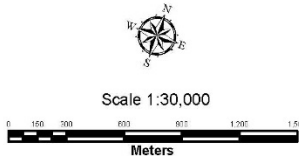
Legend

- | | | |
|------------------------|--------------------------|---|
| Downtown | Neighbourhood | Green Space |
| Transit Village | Future Community Growth | Environmental Review |
| Shopping Area | Heavy Industrial | Farmland |
| Major Shopping Area | Light Industrial | Rural Neighbourhood |
| Rapid Transit Corridor | Future Industrial Growth | Waste Management Resource Recovery Area |
| Urban Corridor | Commercial Industrial | Urban Growth Boundary |
| Main Street | Institutional | |

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

**SCHEDULE 2-7
TO
OFFICIAL AMENDMENT NO. _____**

PREPARED BY: Planning & Development

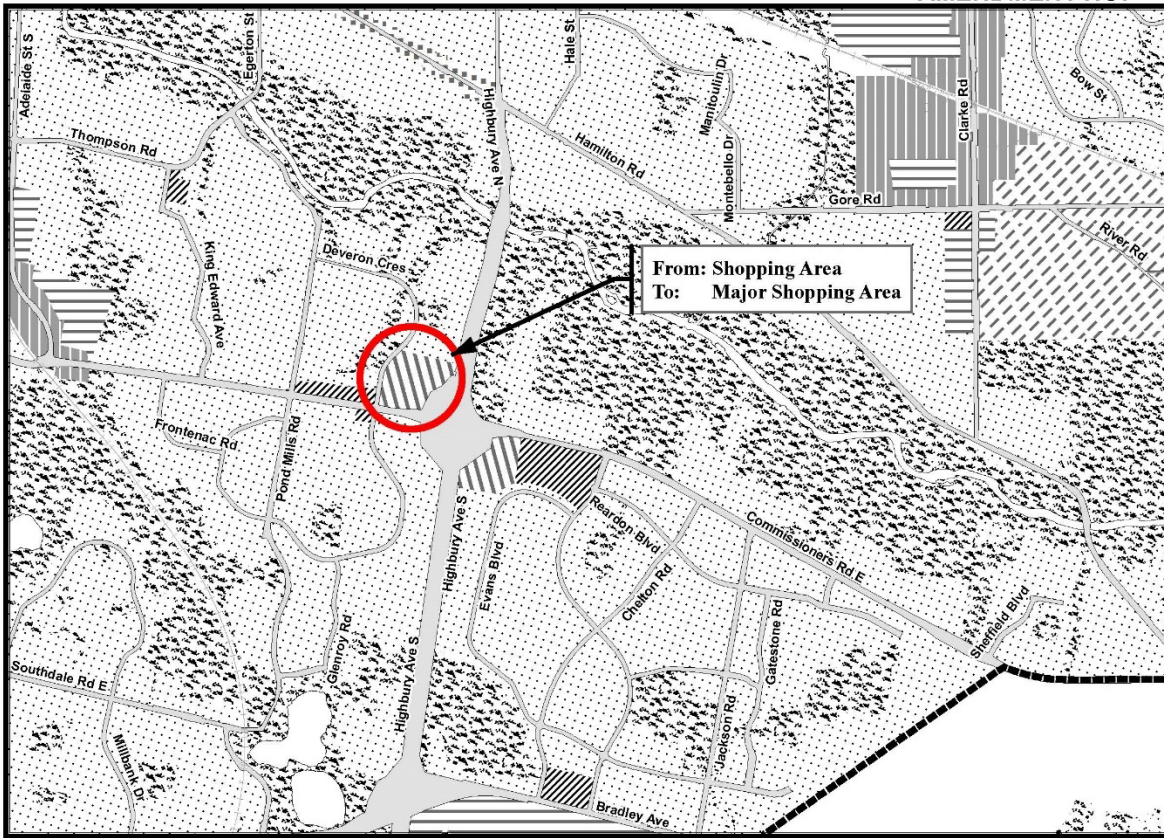


FILE NUMBER: O-9753

PLANNER: SB

TECHNICIAN: JI

DATE: 8/23/2024

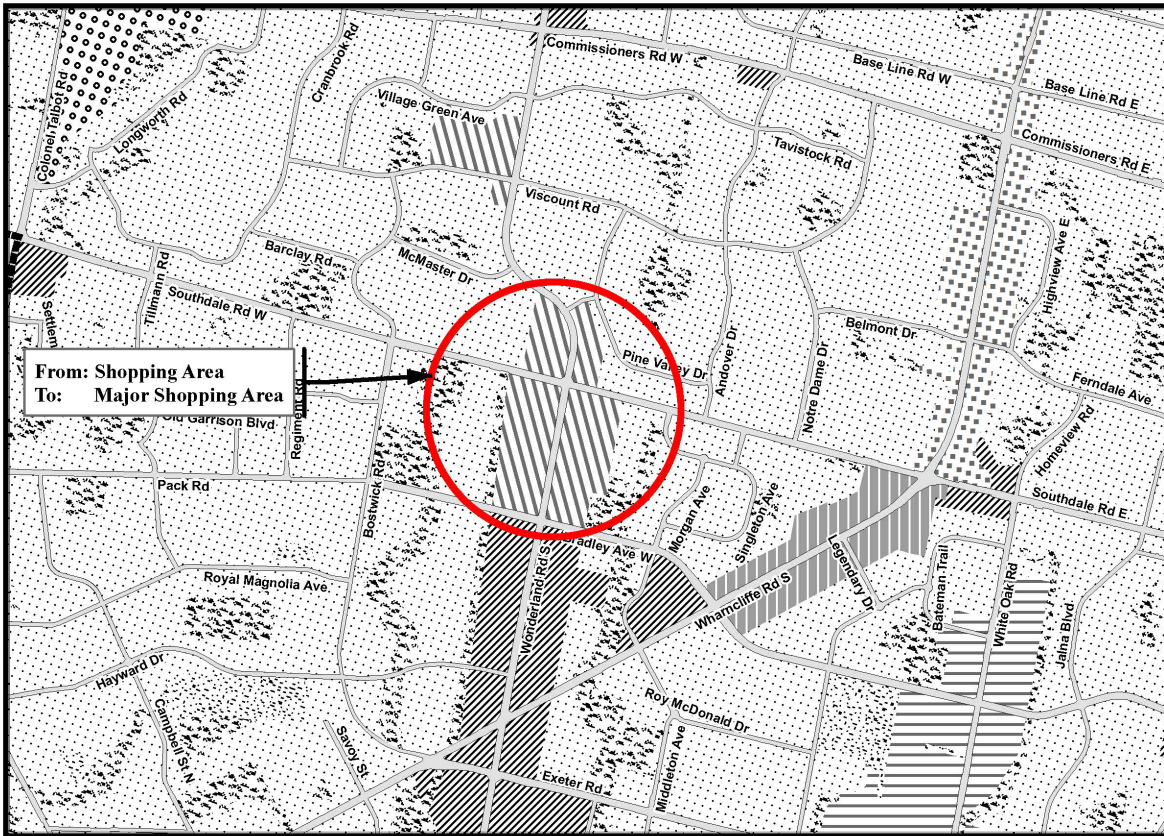


Legend

Downtown	Neighbourhood	Green Space
Transit Village	Future Community Growth	Environmental Review
Shopping Area	Heavy Industrial	Farmland
Major Shopping Area	Light Industrial	Rural Neighbourhood
Rapid Transit Corridor	Future Industrial Growth	Waste Management Resource Recovery Area
Urban Corridor	Commercial Industrial	Urban Growth Boundary
Main Street	Institutional	

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

<p>SCHEDULE 2-8 TO OFFICIAL AMENDMENT NO. _____</p> <p>PREPARED BY: Planning & Development</p>	<p>Scale 1:30,000</p> <p>Meters</p>	<p>FILE NUMBER: O-9753</p> <p>PLANNER: SB</p> <p>TECHNICIAN: JI</p> <p>DATE: 8/23/2024</p>
---	-------------------------------------	--



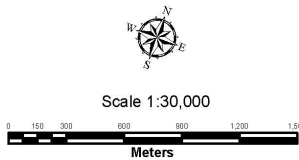
Legend

- | | | |
|------------------------|--------------------------|---|
| Downtown | Neighbourhood | Green Space |
| Transit Village | Future Community Growth | Environmental Review |
| Shopping Area | Heavy Industrial | Farmland |
| Major Shopping Area | Light Industrial | Rural Neighbourhood |
| Rapid Transit Corridor | Future Industrial Growth | Waste Management Resource Recovery Area |
| Urban Corridor | Commercial Industrial | Urban Growth Boundary |
| Main Street | Institutional | |

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

**SCHEDULE 2-9
TO
OFFICIAL AMENDMENT NO. _____**

PREPARED BY: Planning & Development

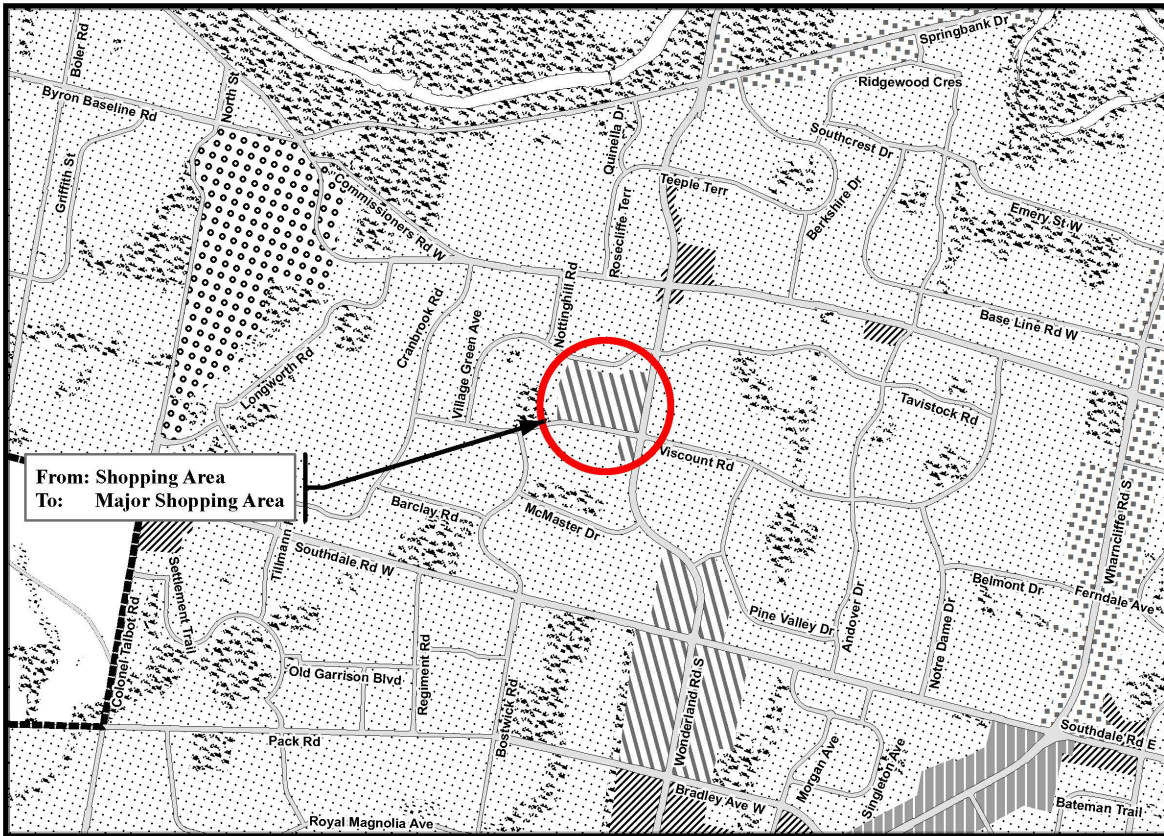


FILE NUMBER: O-9753

PLANNER: SB

TECHNICIAN: JI

DATE: 8/23/2024



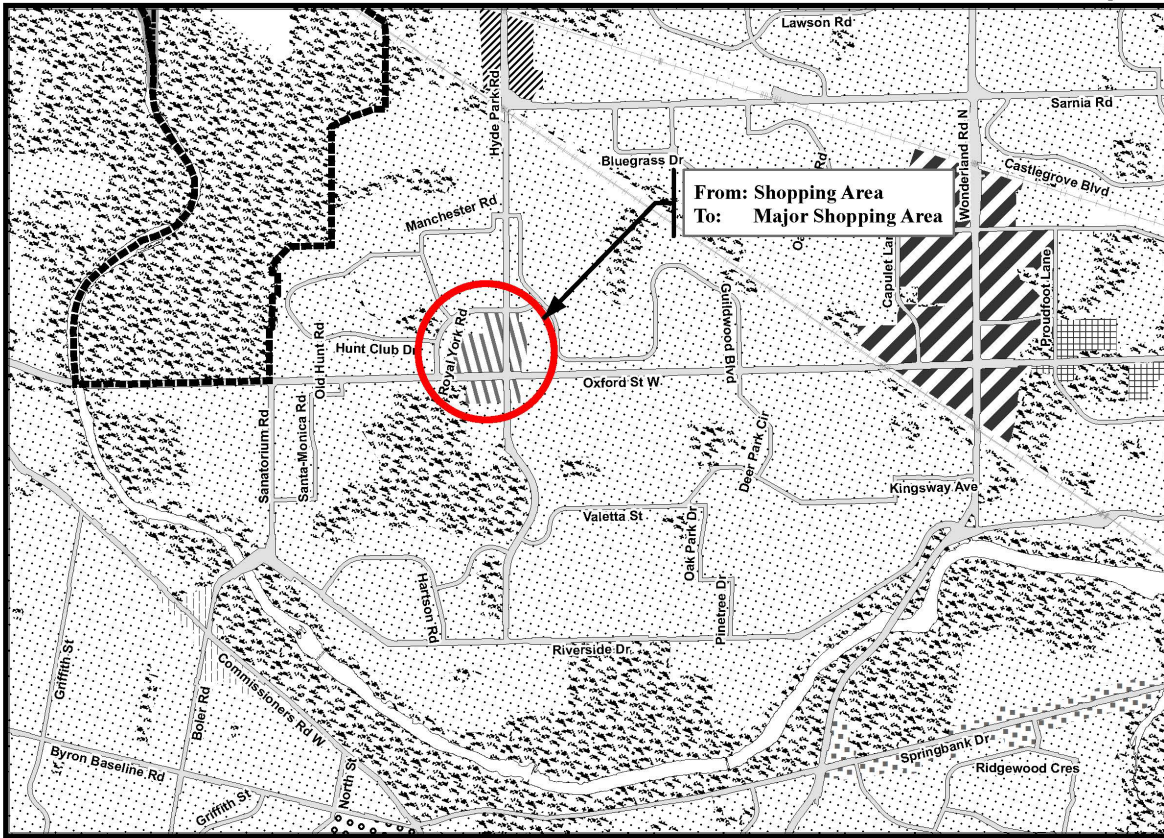
Legend

Downtown	Neighbourhood	Green Space
Transit Village	Future Community Growth	Environmental Review
Shopping Area	Heavy Industrial	Farmland
Major Shopping Area	Light Industrial	Rural Neighbourhood
Rapid Transit Corridor	Future Industrial Growth	Waste Management Resource Recovery Area
Urban Corridor	Commercial Industrial	Urban Growth Boundary
Main Street	Institutional	

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

<p>SCHEDULE 2-10 TO OFFICIAL AMENDMENT NO. _____</p> <p>PREPARED BY: Planning & Development</p>	<p>Scale 1:30,000</p> <p>Meters</p>	<p>FILE NUMBER: O-9753</p> <p>PLANNER: SB</p> <p>TECHNICIAN: JI</p> <p>DATE: 8/23/2024</p>
--	-------------------------------------	--

AMENDMENT NO:



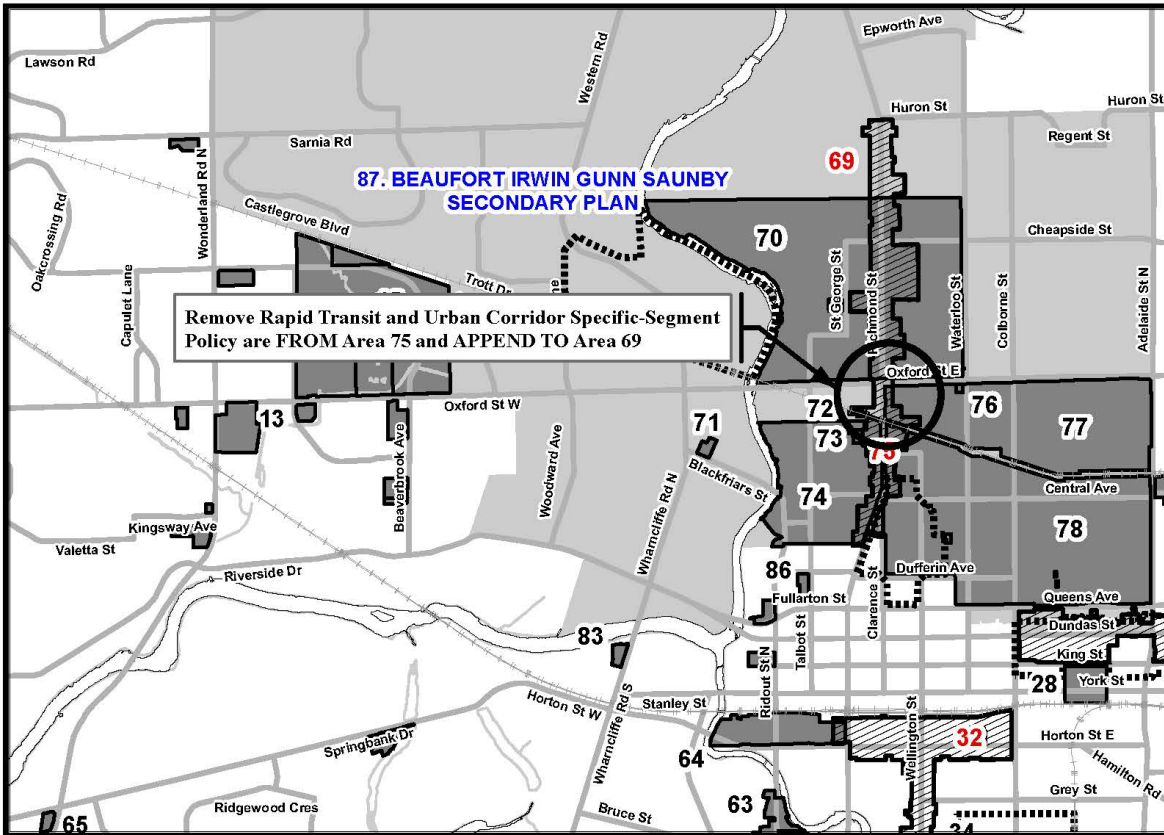
Legend

- | | | |
|------------------------|--------------------------|---|
| Downtown | Neighbourhood | Green Space |
| Transit Village | Future Community Growth | Environmental Review |
| Shopping Area | Heavy Industrial | Farmland |
| Major Shopping Area | Light Industrial | Rural Neighbourhood |
| Rapid Transit Corridor | Future Industrial Growth | Waste Management Resource Recovery Area |
| Urban Corridor | Commercial Industrial | Urban Growth Boundary |
| Main Street | Institutional | |

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

<p>SCHEDULE 2-11 TO OFFICIAL AMENDMENT NO. _____</p> <p>PREPARED BY: Planning & Development</p>	<p>Scale 1:30,000</p> <p>Meters</p>	<p>FILE NUMBER: O-9753</p> <p>PLANNER: SB</p> <p>TECHNICIAN: JI</p> <p>DATE: 8/23/2024</p>
--	-------------------------------------	--





AMENDMENT NO:



LEGEND

-  Specific Policies
-  Rapid Transit and Urban Corridor Specific-Segment Policies
-  Near Campus Neighbourhood
-  Secondary Plans

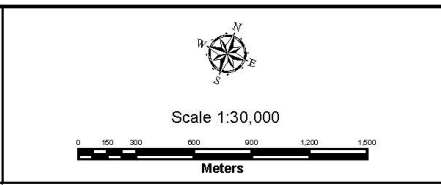
BASE MAP FEATURES

-  Streets (See Map 3)
-  Railways
-  Urban Growth Boundary
-  Water Courses/Ponds

This is an excerpt from the Planning Division's working consolidation of Map 7 - Special Policy Areas of the London Plan, with added notations.

**SCHEDULE 3
TO**
OFFICIAL AMENDMENT NO. _____

PREPARED BY: Planning & Development



FILE NUMBER: OZ-9726
PLANNER: SF
TECHNICIAN: RC
DATE: 8/23/2024

Appendix B – Zoning By-law Amendment

Bill No. (number to be inserted by Clerk's Office)
2024

By-law No. Z.-1-

A by-law to amend By-law No. Z.-1 to exempt the Transit Village Place Types from Minimum Parking Standards.

WHEREAS upon approval of Official Plan Amendment Number (number to be inserted by Clerk's Office) by the Province of Ontario Ministry of Municipal Affairs and Housing this rezoning will conform to the Official Plan;

THEREFORE the Municipal Council of The Corporation of the City of London enacts as follows:

1. Section 4.19 Parking to By-law No. Z.-1 is amended by deleting and replacing Figure 4.19 Areas Exempt from Minimum Parking Standards, as shown below:

Figure 4.19 Areas Exempt from Minimum Parking Standards

2. This By-law shall come into effect in accordance with Section 34 of the *Planning Act, R.S.O. 1990, c. P13*, either upon the date of the passage of this by-law or as otherwise provided by the said section.

PASSED in Open Council on September 24, 2024 subject to the provisions of PART VI.1 of the *Municipal Act, 2001*.

Josh Morgan

Mayor

Michael Schulthess

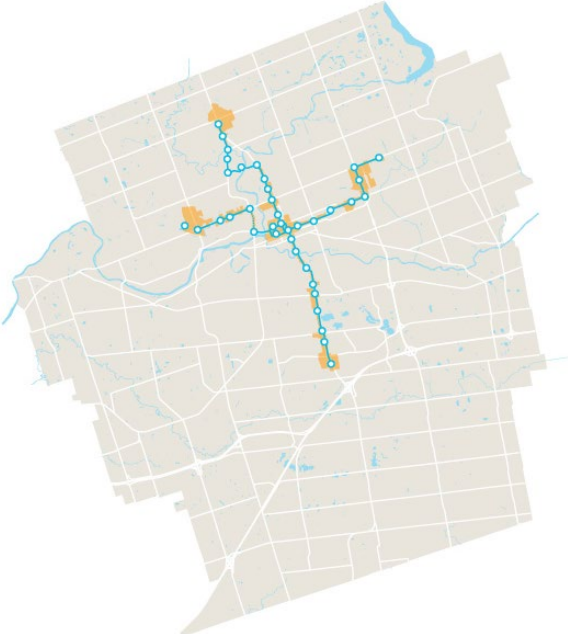
City Clerk

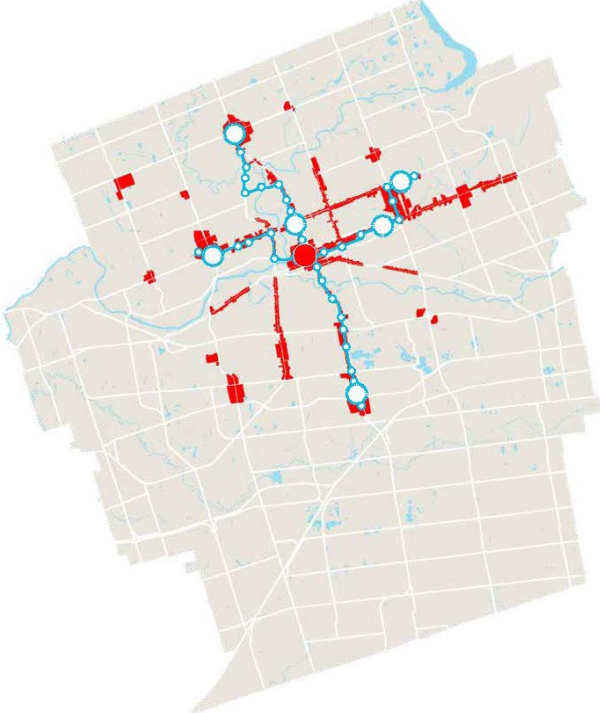
First Reading – September 24, 2024

Second Reading – September 24, 2024


Third Reading –

Appendix C – Proposed Text Amendments with Tracked Changes

	Policy	Proposed Changes (Delete , <u>Add</u>)	Rationale/summary of changes
1.	Figure 5	<p>Note – Figure 5 graphic amended to reflect added transit villages:</p> 	Revised to reflect added transit villages
2.	Figure 14	<p>Note – Amend Figure 14 graphic to include Downtown, Transit Villages, and Rapid Transit Corridors, Urban Corridors, and Major Shopping Areas</p> <p>DOWNTOWN, TRANSIT CORRIDORS AND SHOPPING AREAS <u>STRATEGIC GROWTH AREAS</u></p>	Revised figure to be consistent with amended policies 127-130

	Policy	Proposed Changes (Delete , <u>Add</u>)	Rationale/summary of changes
			
3.	95	<p>Figure 5 illustrates five major centres that include the Downtown and Transit Villages. While the Downtown is unique and will allow for the greatest level of intensity and broadest range of uses, all of these centres are intended to allow for intense, mixed-use neighbourhoods and business areas with centrally located Rapid Transit Stations. These centres will help to make rapid transit viable in the London we envision for 2035 and will also be planned with a high degree of pedestrian amenity making them great places in which to live, shop, work, and play.</p>	Revised to remove reference to number of major centres.
4.	<u>97B</u>	<p><u>The Downtown, Transit Villages, and Rapid Transit Corridors will, along with the Urban Corridors and Major Shopping Areas, constitute London's strategic growth areas that are planned to be the focus for higher-density intensification and will accommodate significant population and employment growth.</u></p>	New Policy to align with new PPS direction on strategic growth centres.
5.	98.2.	<p>Plan for four Transit Villages that support intense forms of mixed-use development</p>	Revised to remove reference to number of transit villages.

	Policy	Proposed Changes (Delete , <u>Add</u>)	Rationale/summary of changes
6.	127	<p>DOWNTOWN, TRANSIT VILLAGES, RAPID TRANSIT CORRIDORS, AND SHOPPING AREAS <u>STRATEGIC GROWTH AREAS</u></p> <p>Figure 14 illustrates <u>identifies</u> our Downtown, Transit Villages, and Rapid Transit Corridors, <u>Urban Corridors, and Major Shopping Areas as strategic growth areas</u>, which will be economic engines for commerce, employment, and economic growth. These mixed-use centres will be planned to offer a wide array of amenities, services, and experiences. They will offer the highest level of communications infrastructure, smart city services, high-quality walking, cycling and transit environments, and will be serviced by rapid transit. They will be planned to be highly supportive of small, medium and large-scale businesses and will be well connected to our major institutions. <u>High-rise buildings will be directed to strategic growth centres.</u></p>	Revised section (policies 127, 129, and 130) to align with new PPS direction on strategic growth centres.
7.	129	<p><u>Major Shopping Areas</u> are also shown on Figure 14. <u>These centres provide opportunities to accommodate significant population and employment growth.</u> These All Shopping Areas serve the regular needs of those who live near them as well as those who travel to them for goods and services. These centres may serve as community hubs to provide for a variety of non-commercial services as well.</p>	
8.	130	<p>The Downtown, Transit Village, Rapid Transit Corridors, <u>Urban Corridor</u>, and Shopping Area Place Type chapters of this Plan provide more detailed policy direction to plan for these <u>strategic growth areas</u>.</p>	
9.	Figure 20	Note – Figure 20 graphic amended to reflect added transit villages:	Revised to reflect added transit villages

	Policy	Proposed Changes (Delete , <u>Add</u>)	Rationale/summary of changes
			
10.	816	<p>The Transit Village Place Types as shown on Map 1 - Place Types are adequate in size to accommodate growth for the foreseeable future, well beyond the life of this Plan. Expanding the Transit Villages could negatively impact a number of important goals for intense, mixed-use development centred around transit stations, and will be strongly discouraged. However, in the event that an expansion of a Transit Village is proposed, the following criteria will be considered:</p> <ol style="list-style-type: none"> 1. The development potential of suitable lands within the Transit Village Place Type to accommodate the types of uses proposed through redevelopment. 2. The potential to undermine the goal of developing an intense and concentrated Transit Village. 3. The pedestrian accessibility and continuity of the proposed expansion area from the transit station. 4. An evaluation of the proposed expansion based on the Planning and 	<p>Revised to include criteria regarding the demonstrated need for addition high-density development sites in order to expand the Transit Village place type.</p>

	Policy	Proposed Changes (Delete , <u>Add</u>)	Rationale/summary of changes
		<p>Development Applications section in the Our Tools part of this Plan.</p> <p>5. <u>The projected growth for high density development supports the proposed expansion without detracting from the concentrated urban character of the existing Transit Village Place Types</u></p>	
11.	817	<p>It is not anticipated that new Transit Village Place Types will be added over the life of this Plan. It is critical that the identified Transit Villages, and the Rapid Transit Corridors that connect them, are developed intensively to make rapid transit sustainable over the long term. Adding new Transit Villages over the life of this Plan is not required to accommodate forecasted growth and would detract from this key objective as well as the many objectives of this Plan relating to growth management and intensification.</p>	<p>Removed sentence to acknowledge that changes may be required to the Plan over time and as is the case here new Transit Villages may be required over time, subject to other policy direction.</p>
12.	864E <u>820A</u>	<p>In the Rapid Transit Corridor Transit Village Place Type located At 100 Kellogg Lane, and 1097 and 1127 Dundas Street, and 351 Eleanor Street, warehouse, wholesale, and self-storage establishments may also be permitted in the basement of the within existing buildings. Office uses may be permitted at 100 Kellogg Lane up to a total maximum gross floor area of 8,361m² (within the existing building) in combination with the Light Industrial Place Type portion of the site to the south. Accessory parking in favour of the uses located at 100 Kellogg Lane may be permitted at 1063, 1080, 1097 and 1127 Dundas Street.</p>	<p>Removes references to Place Types that are no longer applicable. Relocates Policy to Transit Village Place Type. Permits existing industrial uses to remain.</p>
13.	844.2.	<p>Richmond Row - Richmond Street from Oxford Street <u>the CP Rail line</u> to Kent Street</p>	<p>Change the area for the main street policy to reflect that the new Transit Village will be located north of the CP Rail line.</p>
14.	<u>875A</u>	<p><u>Within the Shopping Area Place Type, certain sites have been identified as Major Shopping Areas. These areas are identified as strategic</u></p>	<p>New policy identifying Major Shopping Areas as a</p>

	Policy	Proposed Changes (Delete, Add)	Rationale/summary of changes
		<u>growth area and may permit higher levels of intensity.</u>	Strategic Growth Area.
15.	876.5.	Introduce mid-rise residential development <u>within the Shopping Area Place type, and high-rise mixed-use development within Major Shopping Areas,</u> into these existing centres to intensify their use, promote activity on these sites outside of shopping hours, and strengthen their role as neighbourhood centres.	Amended policy to recognize that Major Shopping Areas support high-rise development.
16.	877.2.	Mixed-use buildings will be encouraged. <u>Commercial and neighbourhood service uses will be required as part of any Shopping Area redevelopment in order to establish and preserve the Shopping Area’s function as a neighbourhood hub.</u>	Amended policy to clarify that a commercial component is required as part of a residential development within a Shopping Area.
17.	878. 2.	Buildings within the Shopping Area Place Type will not exceed four be a maximum height of eight storeys in height, or, in Major Shopping Areas the maximum height is 15 storeys. Buildings up to six storeys, may be permitted in conformity with the Our Tools policies of this Plan.	Changes to the maximum height based on recommendations of the London Heights Framework Review report including 6 to 8 storeys in standard Shopping Areas or 6 to 15 storeys in Major Shopping Areas.
18.	<u>881A</u>	<u>Applications to expand existing Major Shopping Areas or identify new Major Shopping Areas will be evaluated using the Planning and Development Application policies in the Our Tools part of this Plan, in addition to the following:</u> <ol style="list-style-type: none"> 1. <u>New Major Shopping Area Place Types will be permitted only at the intersection of two streets classified as Civic Boulevard or Urban Thoroughfare.</u> 2. <u>Applications for new or expanded Major Shopping Area Place Types will be required to clearly demonstrate the</u> 	New policy to provide direction on how proposals to add or expand Major Shopping Areas will be evaluated.

	Policy	Proposed Changes (Delete , <u>Add</u>)	Rationale/summary of changes
		<p><u>need for the proposed new Major Shopping Area or the proposed expansion onto additional lands, considering all other opportunities for commercial development or redevelopment that have been planned. This will include a review of the opportunities that have been created at appropriate locations in the form of vacant land, vacant space in existing buildings, and expansion, redevelopment and intensification opportunities on existing commercial sites.</u></p> <p>3. <u>Applications for new Major Shopping Area Place Types will be required to demonstrate that the proposed Major Shopping Area will not undermine or detract from the planned function of an existing Shopping Area or any other place type shown in the City Structure Plan and on Map 1.</u></p> <p>4. <u>New or expanded Major Shopping Areas will not be permitted if they take on a linear configuration, rather than a nodal configuration.</u></p> <p>5. <u>The projected growth for high density development supports the proposed expansion without detracting from the concentrated urban character of the existing Transit Village Place Types.</u></p> <p>6. <u>New Major Shopping Areas will be permitted only within the Built Area Boundary.</u></p> <p>7. <u>Applications for new Major Shopping Area Place Types will be supported by an analysis of existing and planned infrastructure to confirm that capacity exists to support the increased level of intensity and does not detract from other strategic growth areas.</u></p>	
19.	910_4.	Buildings <u>within the Main Street Place Type</u> will be a minimum of either two storeys or eight metres in height and will not exceed four	Changes to the maximum height based on

	Policy	Proposed Changes (Delete , <u>Add</u>)	Rationale/summary of changes
		storeys in height. Buildings up to six storeys may be permitted in conformity with the Our Tools policies of this Plan. a maximum of eight storeys.	recommendations of the London Heights Framework Review report including 6 to 8 storeys maximum height from six storeys to eight storeys.
20.	921	Table 10 - Range of Permitted Uses in Neighbourhoods Place Type, shows the range of primary and secondary permitted uses that may be allowed within the Neighbourhoods Place Type, by street classification	Clarifies that all uses identified on the table may be permitted, aligns with changes to Table 10.
21.	1018	Lands <u>outside of the Transit Village Place Type</u> within the St. George/Grosvenor Neighbourhood, bounded by Waterloo Street on the east, Oxford Street West on the south, the Thames River on the west, and Victoria Street on the north, will remain a predominantly low density, low-rise residential area despite continual redevelopment pressure for apartment buildings, expansions to existing hospitals, and office conversions.	Clarifies that policies do not apply within the Transit Village Place Type.
22.	1021	For the lands <u>outside of the Transit Village Place Type</u> on the north side of Oxford Street East, between the Thames River and Waterloo Street and on Richmond Street, between Oxford Street East and Sydenham Street, the height and density of residential buildings will be controlled by the Zoning By-law to permit only mid-rise development which will provide a transition between largescale development in the Richmond Row Rapid Transit Corridor and the low density, residential dwellings of the St. George/Grosvenor Neighbourhood. Mid-rise office development will also be permitted on the lands identified as High Density Residential Overlay (from 1989 Official Plan) on Map 2. Secondary uses permitted in this area will exclude commercial recreation facilities. Convenience commercial uses may be permitted on the ground floor of new apartment and/or office buildings.	Clarifies that policies do not apply within the Transit Village Place Type.

	Policy	Proposed Changes (Delete, Add)	Rationale/summary of changes
23.	1132A	In the Light Industrial Place Type located at 100 Kellogg Lane, self-storage establishments and offices within the existing building will also be permitted. Office uses within the existing building may be permitted up to a total maximum gross floor area of 8,361m² in combination with the Rapid Transit Corridor Place Type portion of the site to the north. Accessory parking in favour of the uses at 100 Kellogg Lane may be permitted at 1151 York Street.	Delete policy. Issues addressed by new proposed policy 820A.
24.	1086_1.	Buildings within the Institutional Place Type will be a minimum of either two storeys or eight metres in height and will not exceed 12 storeys in height. Buildings up to 15 storeys, may be permitted in conformity with the Our Tools policies of this Plan <u>a maximum of 15 storeys in height.</u>	Removes references to standard and upper maximum heights.
25.	1638_	ZONING TO THE UPPER MAXIMUM HEIGHT The maximum height in the applicable Place Type may include a standard maximum and upper maximum height. <u>The framework of permitted building heights is summarized on Table 8 at the beginning of the Urban Place Type policies.</u> Zoning on individual sites may be permitted up to the standard maximum height <u>limit building heights below the maximum listed in the applicable Place Type.</u> <u>An applications to exceed the standard increase the maximum height in the Zoning by-law will be reviewed on a site-specific basis. and will not require an amendment to this Plan.</u> <u>Applications for heights exceeding the upper maximum of the applicable Place Type will require an amendment to this Plan and the addition of a new specific area policy.</u>	Removes references to standard and upper maximum heights. Focuses on mitigation of impacts from buildings that are near to top of the permitted height range.
26.	1639_	A framework of heights that includes standard maximum and upper maximum heights, is shown on Table 8 at the beginning of the Urban Place Type policies.	Removes policy describing standard and upper maximum heights
27.	1640_	In order to provide certainty and to ensure that the features required to mitigate the impacts of the additional height and densities are	Removes reference to standard and upper maximum

	Policy	Proposed Changes (Delete, <u>Add</u>)	Rationale/summary of changes
		provided, a site-specific zoning by-law amendment will be required to exceed the standard maximum height . Through the amendment process the community, City Council and other stakeholders can be assured <u>ensure</u> that measures will be implemented to mitigate any impacts of additional height or density.	heights. Replaces “stakeholders” with “interested parties” for more inclusive language.
28.	1641_	Increases in building height above the Standard Maximum <u>Applications to increase the maximum building height</u> may be permitted where the resulting intensity and form of the proposed development represents good planning within its context	Removes refence to standard maximum heights.
29.	1795	<u>Strategic Growth Area means an area within the City that has been identified to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form.</u>	Add new definition consistent with the proposed 2024 PPS

Table 8 – Summary of Minimum and Maximum Heights by Place Type

Place Type	Minimum Height (storeys or m)	Standard Maximum Height (storeys)	Upper Maximum Height (storeys)	Condition
Downtown	3 storeys or 9m	20	35 45	
Transit Village	2 storeys or 8m	15	22 30	
Rapid Transit Corridor	2 storeys or 8m	10	12 25	Properties along a Rapid Transit Corridor. Properties located on a Rapid Transit Corridor within 150m of the Transit Station or properties at the intersection of the Rapid Transit Corridor and Civic Boulevard and Urban Thoroughfare
				12 15
Urban Corridor	2 storeys or 8m	8	10 15	
Shopping Area	1 storey or 2 storeys for residential uses	4	6 15	Major Shopping Areas
	1 storey or 2 storeys for residential uses		8	
Main Street	2 storeys or 8m	4	6 8	
Neighbourhoods	See Neighbourhoods policies & tables			
High Density Residential Overlay (from 1989 Official Plan)	2 storeys	12 (outside of the Primary Transit Area) or 14 (inside the Primary Transit Area)	n/a 12 (outside the Primary Transit Area) or 14 (inside the Primary Transit Area)	See High Density Residential Overlay (from 1989 Official Plan) policies for greater detail.
Institutional	2 storeys or 8m	12	15	
Industrial	1 storey	2	n/a 2	Commercial Industrial Place Type only.

Note 1 - The heights shown in this table will not necessarily be permitted on all sites within the relevant place type.

Note 2 - Where more specific policies exist in this Plan relating to height for an area or specific site, these more specific policies shall prevail; readers should consult all the policies of this chapter, Map 7 which shows specific policy areas and Secondary Plans to identify applicable specific policies.

Table 9 – Maximum Height in the Rapid Transit and Urban Corridor Place Types

Place Type	Minimum Height (storeys or m)	Standard Maximum Height (storeys)	Upper Maximum Height (storeys)	Condition
Rapid Transit Corridor	2 storeys or 8m	10	12 <u>25</u>	Properties along a Rapid Transit Corridor. Properties located on a Rapid Transit Corridor within 150m of rapid transit stations or properties at the intersection of a Rapid Transit Corridor and a Civic Boulevard or Urban Thoroughfare
	2 storeys or 8m	12	16 <u>15</u>	Properties located on a Rapid Transit Corridor within 100m of rapid transit stations or properties at the intersection of a Rapid Transit Corridor and a Civic Boulevard or Urban Thoroughfare Other properties on a Rapid Transit Corridor
Urban Corridor	2 storeys or 8m	8	10 <u>15</u>	

Note 1 – The heights shown in this table will not necessarily be permitted on all sites within the Rapid Transit and Urban Corridor Place Types.

Note 2 – Where more specific policies exist in this Plan relating to height for an area or specific site, these more specific policies shall prevail; readers should consult all the policies of this chapter, Map 7 which shows specific policy areas and Secondary Plans to identify applicable specific policies.

Note 3 – ~~Zoning may be applied up to the Standard Maximum Height; increases in height may be considered up to the Upper Maximum Height in accordance with the Our Tools part of the Plan.~~

Table 10 – Permitted Range of Uses in the Neighbourhoods Place Type

Street onto which property has frontage	Range of primary permitted uses	Range of secondary permitted uses Additional permitted uses at intersections conditional on classification of intersecting street				Range of secondary permitted uses Additional permitted uses
		Neighbourhood Street	Neighbourhood Connector	Civic Boulevard and Urban Thoroughfare	Urban Thoroughfare	Fronting onto Park
Neighbourhood Street	<ul style="list-style-type: none"> Single detached Semi-detached Duplex Multiplex up to 4 units Converted dwellings Townhouses Additional residential units Home occupations Group homes 	N/A	N/A	N/A	N/A	N/A
Neighbourhood Connector	As per Neighbourhood Street plus: <ul style="list-style-type: none"> Triplexes Small-scale community facilities Only in Central London: <u>Primary Transit Area</u> Fourplexes Stacked townhouse Low-rise Apartments 	N/A	Secondary Uses: <ul style="list-style-type: none"> Mixed-use buildings Fourplexes Stacked townhouses Low-rise Apartments 	Secondary Uses: <ul style="list-style-type: none"> Mixed-use buildings Fourplexes Stacked townhouses Low-rise Apartments 	Secondary Uses: <ul style="list-style-type: none"> Mixed-use buildings Fourplexes Stacked townhouses Low-rise Apartments 	Secondary Uses: <ul style="list-style-type: none"> Mixed-use buildings Fourplexes Stacked townhouses Low-rise Apartments
Civic Boulevard and Urban Thoroughfare	As per Neighbourhood Connector plus: <ul style="list-style-type: none"> Stacked townhouses Fourplexes Low-rise Apartments Emergency care establishments Rooming houses 	N/A	Secondary Uses: <ul style="list-style-type: none"> Mixed-use buildings 	Secondary Uses: <ul style="list-style-type: none"> Mixed-use building Stand-alone retail, service, office 	Secondary Uses: <ul style="list-style-type: none"> Mixed-use building Stand-alone retail, service, office 	N/A

	Supervised correctional residences					
--	--	--	--	--	--	--

Note 1 - The full range of uses shown in this table will not necessarily be permitted on all sites within the Neighbourhoods Place Type

Note 2 – Where more specific policies exist in this Plan relating to permitted uses for an area or specific site, these more specific policies shall prevail, readers should consult all the policies of this chapter, Map 7 which shows specific policy areas, and the Secondary Plans part of this Plan to identify applicable specific policies.

Table 11 – Range of Permitted Heights in Neighbourhoods Place Type

Street onto which property has frontage	Minimum and maximum heights (storeys) that may be permitted along this classification of street (Base condition)	Minimum and maximum height (storeys) that may be permitted conditional upon classification of intersecting street				Minimum and maximum height (storeys) that may be permitted conditional upon fronting onto park
		Neighbourhood Street	Neighbourhood Connector	Civic Boulevard and Urban Thoroughfare	Urban Thoroughfare	Fronting onto Park
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 Standard Max. 3 Upper Max. 4 in Central London <u>Primary Transit Area</u>	Same as base	Min. 2 Standard Max. 3 Upper Max. 4 Upper Max. 6 in Central London <u>Primary Transit Area</u>	Min. 2 Standard Max. 4 Upper Max. 6 Upper Max. 8 in Central London <u>Primary Transit Area</u>	Min. 2 Standard Max. 4 Upper Max. 6 Upper Max. 8 in Central London	Min. 2 Standard Max. 3 Upper Max. 4
Civic Boulevard and Urban Thoroughfare	Min. 2 Standard Max. 4 Upper Max. 6 Upper Max. 8 in Central London <u>Primary Transit Area</u>	Same as base	Same as base	Same as base Min. 2 Max 8	Same as base	Same as base
Urban Thoroughfare	Min. 2 Standard Max. 4 Upper Max. 6 Upper Max. 8 in Central London	Same as base	Same as base	Same as base	Same as base	Same as base

Note 1 – The heights shown in this table will not necessarily be permitted on all sites within the Neighbourhoods Place Type

Note 2 – Where more specific policies exist in this Plan relating to height for an area or specific site, these more specific policies shall prevail; readers should consult all the policies of this chapter, Map 7 which shows specific policy areas and Secondary Plans to identify applicable specific policies.

~~Note 3 – Zoning may be applied up to the Standard Maximum Height; increases in height may be considered up to the Upper Maximum Height in accordance with the Our Tools part of the Plan.~~

Appendix D – Agency and Departmental Comments

C.1 Heights Review

London Hydro (July 25, 2024)

London Hydro has no objection to this proposal or possible official plan and/or zoning amendment. Any new or relocation of the existing service will be at the expense of the owner.

Bell Canada (August 9, 2024)

Thank you for circulating Bell Canada on the City of London's request for comments on the above noted. Bell appreciates the opportunity to engage in infrastructure and policy initiatives across Ontario.

While we do not have any specific comments or concerns at this time, we would ask that Bell continue to be circulated on any future materials and/or decisions related to this matter.

Upper Thames River Conservation Authority (UTRCA) (August 14, 2024)

Please see attached the UTRCA's comments and associated series of mapping related to Official Plan Amendment O-9752 - Heights Framework Review. Please feel free to reach out with any further questions related to this matter. The Upper Thames River Conservation Authority (UTRCA) has reviewed this application for Official Plan Amendments with regard for the policies in the Environmental Planning Policy Manual for the Upper Thames River Conservation Authority (June 2006). These policies include regulations made pursuant to Section 28 of the Conservation Authorities Act, and are consistent with the natural hazard policies contained in the Provincial Policy Statement (2020, PPS).

BACKGROUND & PROPOSAL

As noted in the circulation, in March 2023, the City of London was awarded funding through the Housing Accelerator Fund (HAF) which was created to encourage the growth of the municipality's housing supply and enhance certainty in development approvals. As part of the HAF, the amendments to the Building Heights Framework and accompanying policy contained in the London Plan would allow for new, higher-intensity development within areas centrally located near rapid-transit and connecting to the Downtown. Overall, the proposed changes are intended to support additional housing while ensuring appropriate development.

The City of London is proposing amendments to the London Plan which will permit increased heights within a range of Place Types and including:

1. Amending the minimum and maximum building heights;
2. Removing the "standard maximum" heights; and

3. Amending the policies and design standards for tall buildings (greater than eight storeys).

The specific amendments pertain to the following policies of the London Plan:

- City Building Policies - 339_10, 521_; 584_;
- Place Type Policy - 789_ 3.; Table 8; Table 9; Table 11; 802_ 1.; 803C_; 803D_; 813_ 1.; 815C_;
- 815D_; 828_; 839_; 840_ 5.; 840_ 6.; 847_; 860C_; 860D_; 878_ 2.; 897_; 910_ 4.; 958_; 1086_ 1.;
- and;
- Our Tools Policy 1638_; 1639_; 1640_; 1641_; High-rise building.

In both 2015 and 2016, during the preparation of the London Plan, the UTRCA's advice to municipal planning staff has been consistent with Provincial policy and has indicated that development is generally not permitted within natural hazard lands.

Since that time, the Conservation Authority has reviewed and commented on various amendments to both the Official Plan and Zoning By-law. We have consistently advised and cautioned regarding the potential conflict between the City's intensification policies which proposes to allow for development at a greater intensity and building heights in natural hazard lands which would not be consistent with the Provincial Policy Statement (PPS).

More recently in correspondence dated July 26, 2024, the UTRCA advised municipal planning staff that a proposal to amend the Zoning By-law to facilitate the construction of a 16 storey, mixed-use building with two (2) levels of underground parking at 250 Wharncliffe Road North, located within the flood plain and within the West London Potential Special Policy Area, was not consistent with Provincial policy, was not in conformity with Municipal policy, and did not have regard for UTRCA policy. Based on the Environmental Policies in the London Plan, the presence of the floodplain and associated Conservation Authority regulations supersede the underlying Place Types of the London Plan. Accordingly, we recommended refusal of any future Planning Act applications seeking to intensify the use of the lands.

CONSERVATION AUTHORITIES ACT

There are numerous areas and properties throughout the City of London which **are** regulated by the UTRCA in accordance with Ontario Regulation 41/24 made pursuant to Section 28 of the Conservation Authorities Act. The regulated area is comprised of riverine flooding and erosion hazards, as well as wetlands and the surrounding areas of interference.

Please refer to the attached series of mapping which identifies some of the key locations where there may be a policy conflict between the regulated natural hazard features and the various areas where an increase in the maximum building heights and development intensity is being proposed through this current Official Plan Amendment application. It should be noted that this mapping is not exhaustive and does not fully capture the full extent of the potentially impacted regulated areas. As noted, the provided mapping is intended to assist with the review of the potential policy conflict associated with the proposed amendment. All properties will continue to be reviewed on a site-specific basis.

In cases where a discrepancy in the mapping occurs, the text of the regulation prevails and a feature determined to be present on the landscape may be regulated by the UTRCA.

The UTRCA has jurisdiction over lands within the regulated area and requires that landowners obtain written approval from the Authority prior to undertaking any site alteration or development within this area including filling, grading, construction, alteration to a watercourse and/or interference with a wetland.

Further, the Conservation Authorities Act provides a definition of “development” which means:

- a) the construction, reconstruction, erection or placing of a building or structure of any kind,
- b) any change to a building or structure that would have the effect of altering the use or potential use of the building or structure, increasing the size of the building or structure or increasing the number of dwelling units in the building or structure,
- c) site grading, or
- d) the temporary or permanent placing, dumping or removal of any material, originating on the site or elsewhere;

UTRCA ENVIRONMENTAL PLANNING POLICY MANUAL (2006)

The UTRCA's Environmental Planning Policy Manual is available online at:

<https://thamesriver.on.ca/wp-content/uploads/EnvPlanningPolicyManual-update2017.pdf>

NATURAL HAZARDS

As indicated, the UTRCA represents the provincial interest in commenting on Planning Act applications with respect to natural hazards. The PPS directs new development to locate and avoid natural hazards. In Ontario, prevention is the preferred approach for managing hazards in order to reduce or minimize the risk to life and property. This is achieved through land use planning and the Conservation Authority's regulations with

respect to site alteration and development activities. The UTRCA's natural hazard policies are consistent with the PPS and those which are applicable to the subject lands include:

3.2.2 General Natural Hazard Policies

These policies direct new development and site alteration away from hazard lands. No new hazards are to be created and existing hazards should not be aggravated. The Authority also does not support the fragmentation of hazard lands through lot creation which is consistent with the PPS.

3.2.3 Riverine Flooding Hazard Policies

These policies address matters such as the provision of detailed flood plain mapping, floodplain planning approach, and uses that may be allowed in the flood plain subject to satisfying UTRCA permit requirements.

3.2.4 Riverine Erosion Hazard Policies

The Authority generally does not permit development and site alteration in the meander belt or on the face of steep slopes, ravines and distinct valley walls. The establishment of the hazard limit must be based upon the natural state of the slope, and not through re-grading or the use of structures or devices to stabilize the slope.

3.2.6 Wetland Policies

New development and site alteration is not permitted in wetlands. Furthermore, new development and site alteration may only be permitted in the area of interference and /or adjacent lands of a wetland if it can be demonstrated through the preparation of an Environmental Impact Study (EIS) that there will be no negative impact on the hydrological and ecological function of the feature.

DRINKING WATER SOURCE PROTECTION – *Clean Water Act*

For policies, mapping and further information pertaining to drinking water source protection; please refer to the approved Source Protection Plan at:

<https://www.sourcewaterprotection.on.ca/approved-source-protection-plan/>

COMMENTS

The UTRCA has reviewed the circulated Official Plan Amendment application regarding the City of London's review of the Heights Framework contained in the London Plan. As indicated, the Conservation Authority is concerned and cautions regarding the potential policy conflict between the increased building heights and resulting greater intensity of development in natural hazard lands which would not be consistent with the PPS, or with Municipal and UTRCA natural hazards policies.

We offer the following comments:

1. As noted, numerous areas and properties in the City of London are regulated by the UTRCA in accordance with Ontario Regulation 41/24 made pursuant to Section 28 of the Conservation Authorities Act.
2. Consistent with Provincial policy, development is not permitted within natural hazard lands, including intensification of uses through zoning. As a result, the UTRCA may not be in a position to support proposed development consistent with this amendment within the areas of the City subject to natural hazards.
3. Please refer to the attached series of mapping which identifies some of the key locations where there may be a policy conflict between the regulated natural hazard features and the various areas where an increase in the maximum building heights and development intensity is being proposed through this current Official Plan Amendment application. It should be noted that this mapping is not exhaustive and does not fully capture the full extent of the potentially impacted regulated areas. As noted, the provided mapping is intended to assist with the review of the potential policy conflict associated with the proposed amendment. All properties will continue to be reviewed on a site-specific basis.
4. The conversion of non-residential uses to residential is also not permitted within Potential Special Policy Areas. The UTRCA recognizes new residential and commercial uses as new development, placing additional people and property at risk. As a result, the UTRCA likely would not be in a position to issue the necessary Section 28 approvals for proposed development consistent with this amendment within the areas of the City which are located in Potential Special Policy Areas.
5. Based on the London Plan Environmental Policies, the presence of the floodplain and associated Conservation Authority regulations supersede the underlying Place Types of the London Plan.
6. It is important to note that properties affected by natural hazards may not necessarily be designated or zoned to reflect the natural hazard features, and it is therefore not sufficient to rely on the designation or zoning as a test for allowing greater intensity and height of development in hazard lands.
7. The UTRCA and the City of London have policies to limit intensification and it will be necessary to incorporate appropriate provisions in the Place Type policies to ensure that the policies are consistent with Provincial, UTRCA and City natural hazards policies.

Once available, the UTRCA would appreciate the opportunity to review the wording of the proposed policy changes/amendment.

Thank you for the opportunity to comment.

Yours truly,
UPPER THAMES RIVER CONSERVATION AUTHORITY

Jenna Allain
Manager of Environmental Planning and Regulations
JK/KW/CC/JA/AL/al

Enclosure: UTRCA Approximate Regulated Areas mapping

250 Wharncliffe Road North, London (2023)
Figure 1: BGIS Neighbourhood (2024)
Figure 2: Blackfriars Neighbourhood (2024)
Figure 3: Broughdale Neighbourhood (2024)
Figure 4: Downtown (2024)
Figure 5: Exeter Road (2024)
Figure 6: Front Street (2024)
Figure 7: Mud Creek (2024)
Figure 8: Oxford Street East (2024)
Figure 9: Roxburgh Road (2024)

C.2 Transit Villages

London Hydro Engineering (July 4 and 17, 2024)

London Hydro has no objection to this proposal or possible official plan and/or zoning amendment. Any new or relocation of the existing service will be at the expense of the owner.

Sewer Engineering (July 16, 2024)

Oxford and Richmond servicing

There is a 250mm sanitary sewer on Richmond, with combined sewer south of Piccadilly circa 1898/1904. These Sewers will likely need to be upgraded in the future. There is currently no City plans to upgrade these sewers.

There is a 900mm trunk sanitary sewer on Oxford circa 1930 which may be able to accommodate proposed intensification subject to investigation of the trunk sewer (flow monitoring)

Piccadilly St has 200mm sanitary sewers from Richmond westerly to Talbot St. These sewers will be likely undersized for any intensification. West of Talbot Piccadilly has a 300mm Sanitary sewer which likely can accommodate some intensification. Both Oxford and Piccadilly sanitary sewers go to Ann St Syphon. Likely not an issue with capacity but a flow monitoring program could be implemented to see if there is any residual

capacity in the trunk sewer to accommodate intensification. It is recommended for a capacity analysis to be completed to the 900 on Oxford St for any added intensification.

100 Kellogg Lane

The North half of the Kellogg site flows to the 250mm sanitary sewer on Dundas St. The 300mm Sanitary sewer on Kellogg LN is undersized for intensification. This sewer was installed in 2016 and there is no City plans to upgrade.

Florence/Eleanor St sanitary sewers will be replaced with new local sewers in a future Infrastructure Project in 2025. The local sewer will be sized for some intensification.

Dundas has a 525mm and a 250mm sanitary sewers existing. The trunk on Dundas will have to be investigated to see if there is any capacity for intensification. Any future Applicant will have to look at upgrading the sanitary sewers at their cost as the existing sanitary sewers are undersized for intensification.

Bell Canada (July 10, 2024)

Thank you for circulating Bell Canada on the City of London's above noted Official Plan and Zoning By-law Amendments. Bell appreciates the opportunity to engage in infrastructure and policy initiatives across Ontario.

While we do not have any specific comments or concerns at this time, we would ask that Bell continue to be circulated on any future materials and/or decisions related to this matter.

Please forward all future documents to circulations@wsp.com and should you have any questions, please contact the undersigned.

Urban Design (July 8 and 10, 2024)

Please see below for Urban Design comments regarding the proposed Transit Villages Amendments for Kellogg Lane and Oxford-Richmond Intersection:

Proposed Transit Village Place Type surrounding Kellogg Lane:

- Urban Design recommends continuing the Transit Village Place Type north of Dundas Street to include the existing Rapid Transit Corridor Place Type to ensure a consistent use, intensity, and form on both sides of the Rapid Transit Boulevard (Dundas Street).

Proposed Transit Village Place Type at the Oxford-Richmond Intersection:

- Urban Design is supportive of higher order development along Oxford Street but is concerned with the compatibility with and transition to the Neighbourhood Place Type to the south.

- Urban Design recommends using the rail line as the south border of the Transit Village to ensure height and density is focused to Oxford Street.

As an alternative, removing the 'residential heritage' portion you noted on the map below, along with the triangle portion to the east, would certainly help with the transition into the neighbourhood place type.

Heritage (July 8, 2024)

Both of the proposed Transit Villages include heritage listed and heritage designated properties that are located either within or adjacent to the proposed boundaries. Please note, I am also in agreement with Amanda Lockwood's Urban Design comments, particularly related to a proposed boundary revision for each area.

Please see below for my area-specific comments.

C.2 Transit Villages

London Hydro Engineering (July 4 and 17, 2024)

London Hydro has no objection to this proposal or possible official plan and/or zoning amendment. Any new or relocation of the existing service will be at the expense of the owner.

Sewer Engineering (July 16, 2024)

Oxford and Richmond servicing

There is a 250mm sanitary sewer on Richmond, with combined sewer south of Piccadilly circa 1898/1904. These Sewers will likely need to be upgraded in the future. There is currently no City plans to upgrade these sewers.

There is a 900mm trunk sanitary sewer on Oxford circa 1930 which may be able to accommodate proposed intensification subject to investigation of the trunk sewer (flow monitoring)

Piccadilly St has 200mm sanitary sewers from Richmond westerly to Talbot St. These sewers will be likely undersized for any intensification. West of Talbot Piccadilly has a 300mm Sanitary sewer which likely can accommodate some intensification. Both Oxford and Piccadilly sanitary sewers go to Ann St Syphon. Likely not an issue with capacity but a flow monitoring program could be implemented to see if there is any residual capacity in the trunk sewer to accommodate intensification. Its is recommended for a capacity analysis to be completed to the 900 on Oxford St for any added intensification.

100 Kellogg Lane

The North half of the kellogs site flows to the 250mm sanitary sewer on Dundas St. The 300mm Sanitary sewer on Kellog LN is undersized for intensification. This sewer was installed in 2016 and there is no City plans to upgrade.

Florence/Eleanor St sanitary sewers will be replaced with new local sewers in a future Infrastructure Project in 2025. The local sewer will be sized for some intensification. Dundas has a 525mm and a 250mm sanitary sewers existing. The trunk on Dundas will have to be investigated to see if there is any capacity for intensification. Any future Applicant will have to look at upgrading the sanitary sewers at their cost as the existing sanitary sewers are undersized for intensification.

Bell Canada (July 10, 2024)

Thank you for circulating Bell Canada on the City of London's above noted Official Plan and Zoning By-law Amendments. Bell appreciates the opportunity to engage in infrastructure and policy initiatives across Ontario.

While we do not have any specific comments or concerns at this time, we would ask that Bell continue to be circulated on any future materials and/or decisions related to this matter.

Please forward all future documents to circulations@wsp.com and should you have any questions, please contact the undersigned.

Urban Design (July 8 and 10, 2024)

Please see below for Urban Design comments regarding the proposed Transit Villages Amendments for Kellogg Lane and Oxford-Richmond Intersection:

Proposed Transit Village Place Type surrounding Kellogg Lane:

- Urban Design recommends continuing the Transit Village Place Type north of Dundas Street to include the existing Rapid Transit Corridor Place Type to ensure a consistent use, intensity, and form on both sides of the Rapid Transit Boulevard (Dundas Street).

Proposed Transit Village Place Type at the Oxford-Richmond Intersection:

- Urban Design is supportive of higher order development along Oxford Street but is concerned with the compatibility with and transition to the Neighbourhood Place Type to the south.
 - Urban Design recommends using the rail line as the south border of the Transit Village to ensure height and density is focused to Oxford Street.

As an alternative, removing the 'residential heritage' portion you noted on the map below, along with the triangle portion to the east, would certainly help with the transition into the neighbourhood place type.

Heritage (July 8, 2024)

Both of the proposed Transit Villages include heritage listed and heritage designated properties that are located either within or adjacent to the proposed boundaries. Please note, I am also in agreement with Amanda Lockwood's Urban Design comments, particularly related to a proposed boundary revision for each area.

Please see below for my area-specific comments.

Oxford Street East and Richmond Street

The proposed boundaries for the Transit Village include a high number of properties that are listed on the Register of Cultural Heritage Resources, designated under Part IV of the *Ontario Heritage Act*, or are included within the Bishop Hellmuth Heritage Conservation District. In addition, the boundaries are adjacent to properties that are also included on the Register of Cultural Heritage Resources, or properties that are either designated under Part IV of the *Ontario Heritage Act*, or Part V of the *Ontario Heritage Act* as a part of either Bishop Hellmuth Heritage Conservation District or the West Woodfield Heritage Conservation District. Lastly, the proposed boundaries are included within or adjacent to the former study area for the St. George-Grosvenor Heritage Conservation District which recommended the designation of two separate Heritage Conservation Districts, and is also includes properties within or adjacent to the North Talbot area, and are prioritized within Heritage Places 2.0 (a guideline document to The London Plan) as a potential future Heritage Conservation District.

Planning applications within or adjacent to these properties would require further heritage requirements including, but not limited to a Heritage Impact Assessment to assess the potential impacts of a proposed development and to demonstrate how the heritage attributes of the properties would be conserved.

100 Kellogg Lane

The proposed boundaries for the Transit Village include a number of properties that are listed on the Register of Cultural Heritage Resources including 100 Kellogg Lane, 1097-1127 Dundas Street, 1153-1155 Dundas Street, and 1157-1165 King Street. The boundaries are also adjacent to various properties listed on the Register of Cultural Heritage Resources and the former McCormick's Factory building (1156 Dundas Street), designated under Part IV of the *Ontario Heritage Act*.

Planning applications within or adjacent to these properties would require further heritage requirements including, but not limited to a Heritage Impact Assessment to assess the potential impacts of a proposed development and to demonstrate how the heritage attributes of the properties would be conserved.

Ecology (June 19, 2024)

There are currently no ecological planning issues related to this property and/or associated study requirements.

Major Issues Identified

- None

Ecology – Complete Application Requirements

- None

Notes

- Avoid tree removal within the active bat roosting period (April 30 – September 1) to reduce potential interactions with Endangered bat species, to avoid contravention of the Endangered Species Act.
- Avoid vegetation removal within the active breeding bird period (April 1 – August 30) to avoid disturbing nesting birds and contravening the Migratory Bird Convention Act.

CN (June 18, 2024)

Thank you for consulting CN on the application mentioned in subject. It is noted that the subject site is within 1000 meters of CN railway operations including the CN London Yard's. CN has concerns of developing/densifying residential uses in proximity to railway operations. Development of sensitive uses in proximity to railway operations cultivates an environment in which land use incompatibility issues are exacerbated. The [Guidelines for New Development in Proximity to Railway Operations](#) reinforce the safety and well-being of any existing and future occupants of the area. Please refer to these guidelines for the development of sensitive uses in proximity to railway operations. These policies have been developed by the Railway Association of Canada and the Federation of Canadian Municipalities. CN encourages the municipality to pursue the implementation of the following criteria as conditions of an eventual project approval:

- The Owner shall engage a consultant to undertake an analysis of noise. Subject to the review of the noise report, the Railway may consider other measures recommended by an approved Noise Consultant.
- The following clause should be inserted on land title, in all development agreements, offers to purchase, and agreements of Purchase and Sale or Lease of each dwelling unit within 1000m of the railway right-of-way:

“Warning: Canadian National Railway Company or its assigns or successors in interest has or have a right-of-way within 1000 metres from the land the subject hereof. There may be alterations to or expansions of the railway facilities on such rights-of-way in the future including the possibility that the railway or its assigns or successors as aforesaid may expand its operations, which expansion may affect the living environment of the residents in the vicinity, notwithstanding the inclusion of any noise and vibration

attenuating measures in the design of the development and individual dwelling(s). CNR will not be responsible for any complaints or claims arising from use of such facilities and/or operations on, over or under the aforesaid rights-of-way.”

- The Owner shall through restrictive covenants to be registered on title and all agreements of purchase and sale or lease provide notice to the public that the noise and vibration isolation measures implemented are not to be tampered with or altered and further that the Owner shall have sole responsibility for and shall maintain these measures to the satisfaction of CN.
- The Owner shall enter into an Agreement with CN stipulating how CN's concerns will be resolved and will pay CN's reasonable costs in preparing and negotiating the agreement.
- The Owner shall be required to grant CN an environmental easement for operational noise and vibration emissions, registered against the subject property in favour of CN.

Also note , that there is a spur line with CN operations still active within the transit village located at 100 Kellogg Lane. CN encourages the implementation of the additional following criteria as conditions of an eventual project approval near the spur line:

- Safety setback of habitable buildings from the railway rights-of-way to be a minimum of 15 metres.
- Ground-borne vibration transmission to be evaluated in a report through site testing to determine if dwellings within 75 metres of the railway rights-of-way will be impacted by vibration conditions in excess of 0.14 mm/sec RMS between 4 Hz and 200 Hz. The monitoring system should be capable of measuring frequencies between 4 Hz and 200 Hz, ± 3 dB with an RMS averaging time constant of 1 second. If in excess, isolation measures will be required to ensure living areas do not exceed 0.14 mm/sec RMS on and above the first floor of the dwelling.
- The Owner shall install and maintain a welded wired fence of minimum 1.83 metre height along the mutual property line.
- The storm water management facility must be designed to control storm water runoff to pre-development conditions including the duration and volume of the flow and accordingly have no impacts on CN right of way, including ditches, culverts and tracks. Any proposed alterations to the existing drainage pattern affecting railway property must receive prior concurrence from CNR and be substantiated by a drainage report to the satisfaction of the Railway.

We request that CN rail and the proximity@cn.ca email be circulated on any and all public notices and notice of decisions with respect to this and future land use planning applications with respect to the subject site.

Under the applicable federal legislation, CN is responsible for ensuring the safety of its railway operations. Additionally, as safety is a core value at CN, CN is committed to the health and safety of their employees, the customers we serve and the communities and environment in which we operate, at all times.

In order to ensure the safety of railway operations, CN's operations and infrastructure are not to be impaired or affected by any construction works or any other works. Additionally, any work performed on CN's property must be arranged through a work permit. A work permit ensures that the proponents of the work, its authorized employees, servants, agents or contractors comply with CN's instructions and will take any safety precautions that CN may reasonably deem necessary in order to ensure that railway operations remain safe.

Upper Thames River Conservation Authority (UTRCA) (July 23, 2024)

The Upper Thames River Conservation Authority (UTRCA) has reviewed this Draft Secondary Plan with regard for the policies in the Environmental Planning Policy Manual for the Upper Thames River Conservation Authority (June 2006). These policies include regulations made pursuant to Section 28 of the Conservation Authorities Act, and are consistent with the natural hazard policies contained in the Provincial Policy Statement (2020, PPS).

BACKGROUND AND PROPOSAL

In March 2023, the City of London was awarded funding through the Housing Accelerator Fund (HAF) which was created to encourage housing supply growth and enhance certainty in development approvals. As part of the HAF, the addition of a new Transit Village and accompanying policy would focus on new higher-intensity development within areas centrally located near rapid-transit and connecting to the Downtown. Overall, the proposed changes are intended to support additional housing while ensuring appropriate development.

The City of London is currently undertaking amendments to both the Official Plan and Zoning By-law to amend the policies of the Transit Village Place Type which will:

1. Amend the policies of the Transit Village Place Type to permit additional Transit Villages;
 2. Add a new Transit Village Place Type, situated at and surrounding the Oxford-Richmond intersection;
- and
3. Amend the policies to accommodate the Transit Village Place Type, situated at and surrounding 100 Kellogg Lane.

Specifically, amendments are proposed to the following policies of the London Plan:

- Our City Policy: 95_ and 98_;
- Place Type Policy 816_; 817_; 844_ 2.; 849_ 1.; 849A_ 2.; 864E_; 994_;
- 1018_; 1021_; 1025_;
- 1063A; 1132A_;
- Our Tools Policy 1716_ 9;
- Figure 5 - Downtown, Transit Villages and Rapid Transit Corridors;
- Figure 20 - City Structure Composite;
- Map 1 - Place Types;
- Map 7 - Specific Policy Areas;
- Map 10 - Protected Major Transit Station Areas; and
- Appendix 1 - Maps.

These amendments to The London Plan would permit additional Transit Villages, and add a new Transit Village Place Type at Oxford-Richmond while amending policies to provide consistency for the Transit Village Place Type at 100 Kellogg Lane.

Furthermore, the requested amendment to the Z.-1 Zoning By-law includes:

- Amendment to Figure 4.19 to add the proposed Transit Villages to the Areas Exempt from Minimum Parking Standards in consistency with other Transit Village Place Types.

CONSERVATION AUTHORITIES ACT – Section 28 Regulations

The lands located at and surrounding 100 Kellogg Lane are not affected by any regulations (Ontario Regulation 41/24) made pursuant to Section 28 of the Conservation Authorities Act.

Sections of the subject lands located at and surrounding the Oxford-Richmond intersection are regulated by the UTRCA in accordance with Ontario Regulation 41/24 made pursuant to Section 28 of the Conservation Authorities Act. The regulated area is comprised of:

- Riverine flooding and erosion hazards associated with the Thames River.

Please refer to the attached mapping for the location of the regulated feature. In cases where a discrepancy in the mapping occurs, the text of the regulation prevails and a feature determined to be present on the landscape may be regulated by the UTRCA.

The UTRCA has jurisdiction over lands within the regulated area and requires that landowners obtain written approval from the Authority prior to undertaking any site alteration or development within this area including filling, grading, construction, alteration to a watercourse and/or interference with a wetland.

Further, the Conservation Authorities Act provides a definition of “development” which means:

- a) the construction, reconstruction, erection or placing of a building or structure of any kind,
- b) any change to a building or structure that would have the effect of altering the use or potential use of the building or structure, increasing the size of the building or structure or increasing the number of dwelling units in the building or structure,
- c) site grading, or
- d) the temporary or permanent placing, dumping or removal of any material, originating on the site or elsewhere;

UTRCA ENVIRONMENTAL PLANNING POLICY MANUAL (2006)

The UTRCA's Environmental Planning Policy Manual is available online at:

<https://thamesriver.on.ca/wp-content/uploads/EnvPlanningPolicyManual-update2017.pdf>

NATURAL HAZARDS

As indicated, the UTRCA represents the provincial interest in commenting on Planning Act applications with respect to natural hazards. The PPS directs new development to locate and avoid natural hazards. In Ontario, prevention is the preferred approach for managing hazards in order to reduce or minimize the risk to life and property. This is achieved through land use planning and the Conservation Authority's regulations with respect to site alteration and development activities.

The UTRCA's natural hazard policies are consistent with the PPS and those which are applicable to the subject lands include:

These policies direct new development and site alteration away from hazard lands. No new hazards are to be created and existing hazards should not be aggravated. The Authority also does not support the fragmentation of hazard lands through lot creation which is consistent with the PPS.

3.2.3 Riverine Flooding Hazard Policies

These policies address matters such as the provision of detailed flood plain mapping, floodplain planning approach, and uses that may be allowed in the flood plain subject to satisfying UTRCA permit requirements.

3.2.4 Riverine Erosion Hazard Policies

The Authority generally does not permit development and site alteration in the meander belt or on the face of steep slopes, ravines and distinct valley walls. The establishment of the hazard limit must be based upon the natural state of the slope, and not through re-grading or the use of structures or devices to stabilize the slope.

DRINKING WATER SOURCE PROTECTION – Clean Water Act

For policies, mapping and further information pertaining to drinking water source protection; please refer to the approved Source Protection Plan at:

<https://www.sourcewaterprotection.on.ca/approved-source-protection-plan/>

COMMENTS

The UTRCA has reviewed the provided Transit Village Amendments. We offer the following comments:

1. The lands located at and surrounding 100 Kellogg Lane are not affected by any regulations (Ontario Regulation 41/24) made pursuant to Section 28 of the Conservation Authorities Act. The UTRCA therefore has no concerns with the proposed amendments impacting this location.
2. As indicated, sections of the subject lands located at and surrounding the Oxford-Richmond intersection are regulated by the UTRCA due to the presence of a riverine flooding and erosion hazard associated with the Thames River. The enclosed mapping depicts the western portion of the subject lands, covering the western sections of Anne Street and Piccadilly Street, within the floodplain.
3. Consistent with Provincial policy, development is not permitted within the floodplain. As a result, the UTRCA may not be in a position to support proposed development within this area.
4. The UTRCA and the City of London have policies in place to limit intensification in specific areas and it will be necessary to incorporate appropriate provisions in the Transit Village Place Type policies to ensure that these policies are not contrary to existing policies and that they are consistent with Provincial, UTRCA and City natural hazards policies.

As a result of the above, the UTRCA recommends revising the proposed Transit Village Place Type boundary situated at and surrounding the Oxford-Richmond intersection to exclude the area which is subject flood hazards.

We have no objections to the other amendments as proposed.

C.3 Major Shopping Area Place Type

No comments received from internal departments or external agencies.

Appendix D – Public Engagement

1. Heights Review

On July 18, 2024, a Notice of Application was sent virtually to relevant parties. Notice of Application was also published in the Public Notices and Bidding Opportunities section of The Londoner on August 7, 2024. A Notice for a Community Information Meeting was circulated on July 19, and held on July 31, 2024, which touched on the Heights Review. There were 5 responses received.

Auburn Developments, c/o Alex Vandersluis

- Supportive of heights outlined with the exception of Neighbourhoods
- Neighbourhoods should permit up to 10 storeys on major roads
 - SWAP permits 9 storeys on arterials in medium density designation (SWAP 4.1 iv))
- Support Major Shopping Area place type creation, question criteria for initial delineation of proposed MSA lands
- Request the westerly portion of 1924 Adelaide Street North, as outlined in 24 021043 PAC, be designated MSA
 - Southern portion presently designated Shopping Area
 - Adjacent Stoney Creek Community Centre, this entire node should be designated MSA
- Request 1269 Hyde Park Road (and would suggest that this node in its entirety) be designated MSA
 - This will anchor the Hyde Park Road Main Street corridor at both the north and south ends (Hyde Park/Fanshawe and Hyde Park/Sarnia)
- Per discussion at our meeting, if the City is considering the use of shadow studies to assess development proposals near parks, the City should issue a standard set of requirements/threshold which must be met

We would look forward to an opportunity to discuss our comments and requests on these topics with you.

Sifton Properties Limited c/o Alexandra Haasen

Neighbourhoods Place Type – Heights and Permitted Uses

-

We would like Staff to consider the following in terms of maximum heights/permitted uses within the Neighbourhoods Place Type.

- Neighbourhood Connector – Base Condition Max. 4 stories, with Max. 6 in PTA and Max. 6 stories with Max. 8 in PTA at intersections with Neighbourhood Connectors, Civic Boulevards and Urban Thoroughfares.
 - In terms of permitted uses, we support other LDI members in that stacked townhomes should be permitted along a Neighbourhood Connector and not only within PTA. Sifton's Bostwick Boroughs Development (3480 Morgan Avenue – Site Plan attached) is a good

example of a future stacked townhouse development to be constructed along a Neighbourhood Connector. A Base Condition Max. of 4 stories would be preferred if the City will consider inclusion of stacked townhomes as a permitted use along Neighbourhood Connectors outside of the PTA and a Max. of 6 stories (outside PTA) at intersections with higher order streets (NC, CI and UT) is preferred to provide greater flexibility in development of low rise apartment uses.

- Civic Boulevard and Urban Thoroughfare- Base Condition Max. 8 stories with 12 in PTA and Max. 10 stories outside of PTA at intersection with higher order street classifications.
- Expressway has not been identified on this table. There are properties subject to the Neighbourhoods place type located along the Expressway that should be accounted for through this review of heights in the Neighbourhoods place type. Expressway is arguably the highest order street and could support a higher intensity of development. The City should consider a Base Condition Max. of 10 stories with Max. of 12 stories permitted where the Expressway intersects with a higher order street.

While we can appreciate that the City is looking to establish a hierarchy of building heights in relation to place types, we think there is opportunity to further increase heights beyond 8 stories within Neighbourhoods at certain locations such as at intersections with higher order streets. Providing for a Base Condition Max. of 8 stories along a Civic Boulevard/Urban Thoroughfare will align with the goal of creating a hierarchy of building heights, while increasing to Max. 10 stories at intersections with higher order streets will provide opportunity for a higher intensity of development at key locations where it can be supported.

-

The heights framework as currently proposed provides for a gap between maximum heights across place types (i.e. nothing between 8 stories and 15 stories). While it is recognized that not all applicants may choose to build to 15 stories where permitted, this fact is unknown and cannot be determined. Further, and while it is understood that the High Density Overlay provides permissions for upwards of 12 stories, providing for that middle ground, this is carry over from the 1989 Official Plan. Once all these sites are built out, there will be no ability to provide for mid-high rise buildings outside of urban place types unless an applicant were to apply for a site specific policy area within Neighbourhoods (outside of a PTA). We are concerned that the above heights framework for Neighbourhoods doesn't provide for enough flexibility nor will it assist in limiting requests for site specific policy areas in the Neighbourhoods place type, outside of a PTA.

[Comments on Major Shopping Areas reserved for respective section]

Design Recommendations for Tall Buildings

- Maximum floorplate of 950-1100 m² is a concern. Our average floorplate size based on a subset of conceptual site plans contemplating mid-higher density development is 1550-2200 sq.m.
- Regulating unit mix by requiring that a minimum of 25% of dwelling units have two or more bedrooms is a concern. While we typically aim for a 60/40 split of

one to two bedrooms, we think that unit mix should be left up to market demand. The housing needs assessment prepared by Colliers for the City and presented at the last AHERG meeting identified that the greatest need was for bachelor and one bedroom units. That's not to say that we don't need two bedroom units, but the key takeaway here is that the need will change over time and therefore, best to leave up to the market to determine the right mix.

We appreciate the opportunity to provide comments. If you wish to discuss any of the above further, please don't hesitate to reach out.

John Flemming

[See Transit Villages for comments].

Mike Wallace

[See Transit Villages for comments].

Jeff Petrie

Hello, I own the building at **REDACTED** and support the increased heights and density proposed

Loredana Onesan

[See Transit Villages for comments].

1) Transit Villages

On June 14, 2024, Notice of Application was sent to 2,179 property owners and residents in the surrounding area. Notice of Application was also published in the Public Notices and Bidding Opportunities section of The Londoner on June 6, 2024. A "Planning Application" sign was also placed on the site. A Notice for a Community Information Meeting was circulated on July 19, and held on July 31, 2024. A revised notice was sent on August 7, 2024. There were 48 responses received.

Responses

Telephone	Written
Tammy Butt	Daniel Hertzman
Mark Tovey	Sean M Menard
John Fleming	Edward Etheridge
Art Blumas	Glenn Hickling
Wilsan Mansor	Paul. R. King
AnnaMaria Valastro	Marilyn & Doug Fenton
Lee Greenwood	Fader Design Build c/o Nick Dyjach, Strik, Baldinelli, Moniz Ltd.
Christopher Blackmore	Craille Scott-Barré
	Deb MacLeod
	Noella Cliche
	Dr. Rachel V E Forrester-Jones
	Jackie Farquhar
	Brendon Samuels
	Devin Hanes
	Trevor Holness
	Mary Ann Hodge
	Kelley McKeating and Bruce Jones
	Garry Montgomery
	John Ison
	Dr. Desi Brownstone
	Dr. Kandice McKee
	Najet Hassan
	Pamela Sancton
	Susan D. Agranove
	Josephine Pepe
	Marlyn Loft
	Loblaw Companies Ltd. c/o Laura Jamieson, Zelinka Priamo Ltd.
	Mary Parks
	Nathaniel Ninham
	Diana Coates
	Jan Sayles
	Mike Wallace
	Loredana Onesan
	Dr. Eric Jackson
	Glenn Hickling
	Chris Butler
	Susan Zammit

Tammy Butt

Summary: 100 Kellogg Transit Village seems positive.

Mark Tovey

Summary: Sought clarification about specific area policies. Expressed not receiving notice despite being part of the circulation list.

John Fleming

Summary: Inquired about Kellogg Transit Village, including the timeline and phasing of associated policies.

Email:

We are requesting the following changes to the policies you provided. We've marked them in red in your original email below, and the following bullet points explain what we are asking for and why:

- We note that the cap on office space is a legacy policy that relates to the previous Light Industrial Place Type applied to these lands. We are requesting that you remove this part of the policy entirely, and simply let the standard office floor area restrictions for the Transit Village Place Type apply. Now that the lands are designated Transit Village Place Type, these standard office restrictions are most appropriate and no special policies are needed. If we are looking for additional office floor area beyond the Transit Village standard policies, we will address that through a planning application process in the future.
- There are a couple of light industrial uses in the new Transit Village Place Type that were established in the Light Industrial Place Type long ago and currently remain in operation within the Transit Village Place Type:
 - The first is Drexel Industries – see the excerpt from the 100 Kellogg Website, below. It is a warehouse and wholesale distribution centre that continued the warehouse function that previously existed at Kellogg's when the building was taken over by current ownership
 - The second is located at 351 Eleanor Street – which is a flooring warehouse, wholesaler and retail use

The location of these uses are shown in the map I have prepared for your information below. They are quiet and not particularly busy. Of note, we are only requesting that

they be permitted within existing buildings. We would appreciate it if they can be acknowledged in the OP policy, together with self-storage uses, as permitted uses. This will give these businesses some comfort and certainty that they will continue to be permitted going forward. Identifying these uses as permitted could be particularly important when considering the upcoming zoning amendments that we anticipate for this site in the near future.

- As you know, almost all of the sites within this Transit Village are owned by a single entity. We appreciate that Staff are proposing to carry over the existing policies that allow for flexibility for accessory parking on some sites to accommodate parking that serves other sites in the Transit Village. This is important to coordinate development and establish parking in the most appropriate locations while. We are requesting a minor change to the proposed policy to refer to the Transit Village as a whole, rather than specific addresses within the Transit Village – again, the overwhelming majority of sites in the Transit Village are owned by a single landowner.

Policy	Proposed Changes (Delete , <u>Add</u>)	Rationale/summary of changes
864E-820A	<p>In the Rapid Transit Corridor <u>Transit Village</u> Place Type located at 100 Kellogg Lane, and 1097 and 1127 Dundas Street and 351 Eleanor Street, warehouse, wholesale and self-storage establishments may also be permitted in the basement of the within existing buildings. Office uses may be permitted at 100 Kellogg Lane up to a total maximum gross floor area of 8,361 m² (within the existing building) in combination with the Light Industrial Place Type portion of the site to the south. Accessory parking in favour of the uses located at 100 Kellogg Lane within this Transit Village Place Type may be permitted at 1063, 1080, 1097, 1100 and 1127 Dundas Street or any other lands within the Transit Village Place Type.</p>	Removes references to Place Types that are no longer applicable. Relocates Policy to Transit Village Place Type.
4132A	<p>In the Light Industrial Place Type located at 100 Kellogg Lane, self-storage establishments and offices within the existing building will also be permitted. Office uses</p>	Delete policy. Issues addressed by new proposed policy 820A..

	<p>within the existing building may be permitted up to a total maximum gross floor area of 8,361m2 in combination with the Rapid Transit Corridor Place Type portion of the site to the north. Accessory parking in favour of the uses at 400 Kellogg Lane may be permitted at 1151 York Street.</p>	
--	--	--

The Tricar Group’s Response to the City of London Heights Framework Study & Proposed TSA Zoning - 1 August 12, 2024 Nancy Pasato Manager, Planning Policy (Research) City of London, Planning and Development npasato@london.ca PlanningHAF@london.ca Re: Heights Framework Review and Protected Major Transit Station Areas Zoning Review MANY POSITIVE CHANGES PROPOSED BY STAFF

We submitted a letter to you and your team on May 1, 2024 providing feedback, requests and recommendations relating to the London Heights Framework Review. We also participated in group meetings and one-on-one meetings with City Staff and their planning consultant early in the process. We would like to take this opportunity to acknowledge and express our appreciation for the many positive changes that City Staff are bringing forward – many in keeping with the changes that we requested through these early stages of the process. Given the significant changes in demographics, housing demands and the current and anticipated continuation of the housing crisis in London and Canada as a whole, we appreciate that the City has proposed greater residential building heights in many Place Types. The increased heights Staff are proposing through amendments to the London Plan represent a very positive move and we would like to thank Staff and Council for moving in this direction. Similarly, we applaud the City’s move to pre-zone lands to apply these greater heights – taking the first step towards implementation through the creation and application of a Transit Station Area (TSA) Zone for the Protected Major Transit Station Areas. We support the City’s goal to apply zoning that will allow for as-of-right development without the need for a zoning amendment, thus providing greater certainty that tall buildings will be permitted and shortening the development approvals process considerably. We do, however, believe there remain several important issues to be addressed relating to Staff’s proposed Official Plan and Zoning changes, to create a clear and effective path for more housing to be built in London. The following submission outlines our concerns and suggestions. The Tricar Group’s Response to the City of London Heights Framework Study & Proposed TSA Zoning - 2 OFFICIAL PLAN CONSIDERATIONS DRAFT POLICIES NOT AVAILABLE FOR REVIEW AND FEEDBACK We are concerned that, while the heights proposed for various Place Types have been identified, we have yet to see any proposed Official Plan policies for review. We are unclear on what text changes are proposed to existing Official Plan policies that may come with these greater heights. The SVN Report speaks to a number of regulatory

measures relating to building envelope and built form and we believe it would be a mistake to include these measures within Official Plan policies. Our earlier correspondence of May 1, 2024 emphasized the “importance of flexibility in Official Plan policy” and avoiding numerical standards in policy that would require amendments, “tying up staff time, delaying good projects and substantially increasing the cost of development through application fees and additional development financing costs.” While we have a good understanding of the amendments to height that are being proposed for each Place Type, we have not seen the text amendments that go with these changes. The deadline for public comments relating to the proposed Official Plan amendments is less than a week away, and yet the proposed Official Plan amendments have not yet been made available.

8 STOREYS IN THE NEIGHBOURHOOD PLACE TYPE ALONG MAJOR STREETS We have reviewed the proposed heights framework for the Neighbourhood Place Type as shown below. The Tricar Group’s Response to the City of London Heights Framework Study & Proposed TSA Zoning - 3 We think it is a major mistake to limit heights in the Neighbourhood Place Type to 6 storeys along Civic Boulevards and Urban Thoroughfares (major streets). An important goal for providing more housing supply in London is to clear an easier path for mid-rise development. The Official Plan defines mid-rise development as buildings of up to 8 storeys, with high rise development being 9 storeys or greater. Despite this, the proposed policies would limit mid-rise development to 6 storeys outside the Primary Transit Area, with the exception of a limited number of sites that are located at the intersection of two major streets. We cannot understand the rationale for this unnecessary constraint to housing supply and we are requesting that Table 11 of the London Plan be amended to allow for mid-rise development up to 8 storeys along Civic Boulevards and Urban Thoroughfares outside the Primary Transit Area. We want to clarify that this does not mean that all sites along Civic Boulevards and Urban Thoroughfares would be allowed this maximum height provided by Official Plan policy. Rather, it would only set a policy ceiling of 8 storeys so that an Official Plan amendment would not be required for those sites on Civic Boulevards and Urban Thoroughfares that are appropriate for such height. As you know, the “hill to climb” is much more expensive and difficult when a zoning amendment AND an Official Plan amendment is required. To avoid unnecessary and detrimental limitation on housing supply, the Official Plan should have a vision of allowing for mid-rise development – defined by the Official Plan as up to 8 storeys - along all Civic Boulevards and Urban Thoroughfares. As is the case for all Place Types, the Zoning By-law will establish where this full height will, and will not, be allowed. Finally, we want to point out that the “peanut butter” argument of directing high-rise development to the Primary Transit Area doesn’t apply to mid-rise development. We don’t believe that limiting mid-rise development to the Primary Transit Area is appropriate nor justifiable from a planning perspective.

SHOPPING AREAS We appreciate the proposal to open up the Shopping Area Place Type for greater height and density. With changes in shopping behaviours and the reduced demand for bricks and mortar shopping facilities, there are many weak Shopping Areas in London that could be re-developed as mixed use facilities. These centres are typically well serviced

by transit and many have sites large enough for tall buildings. While we understand the approach of establishing major and minor shopping areas to allow for greater heights in the former, we think that this distinction is unnecessary as the London Plan already makes this distinction, but in a different way. The London Plan allows for smaller scale commercial uses in the Neighbourhood Place Type at the identified in Table 10. These are not identified as Shopping Areas on Map 1 of the London Plan. So, in essence, those sites that are identified as Shopping Areas are major shopping areas. With the changes being proposed, the greatest heights and densities will continue to be located in the Downtown, Transit Villages, and Rapid Transit Corridors -supporting the vision The Tricar Group's Response to the City of London Heights Framework Study & Proposed TSA Zoning - 4 for highly urban and dense residential neighbourhoods where transit services are greatest. Allowing for greater heights along Urban Corridors (as proposed up to 15 storeys) and at shopping centres (proposed up to 15 storeys) makes good sense. However, there are many Shopping Areas that represent good candidates for this greater height. Why wouldn't the City want to see one or two residential towers (up to 15 storeys) at sites like Oakridge Mall, Colonel Talbot/Southdale, West 5, Wonderland/Commissioners or Highbury and Fanshawe? We understand that there are some small commercial sites designated as Shopping Area Place Types that would not be appropriate for this height, but that is where the Zoning By-law would be used to establish an appropriate height based on lot size, FAR and set-backs. We think that the City should consider allowing for up to 15 storeys of height in all Shopping Areas. As it made clear in the Official Plan, zoning for this full range of heights would not necessarily be allowed in all situations and would be established through the zoning by-law.

ZONING FOR HIGHRISE BUILDINGS & PROPOSED TRANSIT STATION AREA ZONE
ZONING REGULATION RECOMMENDATIONS IN THE SVN REPORT

We note that there are several recommendations made in the SVN report that cause concern. These include such measures as:

- Minimum tower separation
- Maximum tower floorplate
- Minimum 5 hours of sunlight in public parks
- Minimum glazing for building facades
- Etc.

We appreciate that Staff have not included many of these measures in the regulations of the proposed TSA Zone. We believe that these measures are not appropriate for the Zoning By-law and should be addressed on a site-specific basis through the site plan process. Some of these matters could be addressed through guidelines, but if this is the case, they should not be treated as requirements or de facto regulations. We would also note that a maximum tower floorplate regulation of 1,100 m² is about half of the tower portion of Riverwalk – which has garnered awards and positive feedback from Council and across the industry. This clearly illustrates the problem with instituting a maximum tower floorplate as a zoning regulation – particularly with the City's goal of avoiding zoning amendments wherever possible. We are hopeful that the same approach – to not include such measures as Zoning regulations - is planned for the Zoning review being undertaken for lands beyond the proposed TSA Zone, to be addressed through the Rethink Zoning process. The Tricar Group's Response to the City of London Heights Framework Study & Proposed TSA Zoning - 5

METHOD FOR IMPLEMENTING DUAL ZONE APPROACH NEEDS CLARIFICATION

Our understanding is that approach proposed by Staff is to leave the existing zoning in place and apply the Transit Station Area Zone as a dual or compound zone. It isn't fully clear, however, how this will be implemented. For example, most sites in the Downtown have zoning in place that don't address many of the set-back, step back, floor area ratio, or other regulatory measures in the new TSA Zone. However, these existing zones typically have unit/ha density regulations that are exceedingly low (eg. 250uph) and, as a matter of course, require a zoning amendment to achieve a reasonable development density for tall buildings. How is the City intending to address such an amendment to the existing zone, where the TSA Zone is also applied? Would an amendment to the existing zone be supported, if it doesn't address the step-back, floor area ratio or set-back requirements of the TSA Zone? Our concern is that the TSA Zone may establish additional expectations or requirements that don't currently exist and these would be brought up as requirements through any zoning amendment process. We can provide a specific example of such a property that we have recently had discussions on together with the City. The new TSA Zone applied to this site actually represents a "down zoning" in terms of permitted height (20 storeys vs. approximately 30 storeys). Staff may suggest that this doesn't matter because the existing zoning remains. However, if a zoning amendment application were to be submitted for increased density, how would the height in the TSA Zone affect the opinion of the public, staff and Council in that application process? Another question we have, is whether there is an intention is to eventually remove the existing zoning in favour of the Transit Station Area Zoning over the long term?

SERVICING AND THE H-213 HOLDING PROVISION We note that the H-213 Zone has been applied to all the zones noted in the draft mapping for the TSA Zone. We have not seen the text for this holding provision. Consistent with the above commentary, we wonder if this holding provision will apply to a use allowed under the existing DA Zone that does not have an existing holding provision. Perhaps the larger point, is how development proposals will get "into the queue" for servicing in the Core area. Given the scarcity of servicing capacity in the Core, it will be important that servicing is not allocated for projects until the site plan approval stage and that sunset provisions are applied to the allocation of servicing. It is imperative that servicing is not reserved for "paper projects" at the expense of "real projects" that are marching through the site plan and building permit approvals process and ready to proceed within a reasonable timeframe. The Tricar Group's Response to the City of London Heights Framework Study & Proposed TSA Zoning - 6

COMPLEXITY OF REGULATIONS IN TSA ZONE COULD UNDERMINE GOAL OF PRE-ZONING AND STREAMLINING PROCESSES In general, we feel that Staff are proposing too many regulations in the TSA Zone, that will invariably lead to the very thing they are seeking to avoid – compulsory rezonings in practice. The TSA Zone includes a very broad range of regulations, including:

- Maximum building height in metres
- Maximum building height in storeys
- Minimum building height of first storey
- Minimum front yard depths for ground-floor non-residential uses
- Maximum front yard depths
- Minimum rear yard depths for certain percentages of the building face
- Minimum rear yard depths abutting a residential zone
- Minimum interior yard depths

Exterior yard depths • Minimum rear yard depths above the 8 th storey • Minimum interior yard depths above the 8 th storey • Minimum step back where there is a street wall • Maximum gross floor area of non-residential uses • Maximum non-residential floor area ratio • Maximum gross floor area for offices • Maximum floor area ratio for building as a whole • Minimum density in units per hectare • Minimum lot frontage • Minimum amenity area • Landscaped open space • Lot coverage • Location of surface parking • Location of structure parking

This long list of regulations will make many sites impractical to develop within the context of the standard TSA Zone. Many of the sites within these highly urban areas are relatively small, shallow, irregularly shaped, and difficult to develop. Together with current requirements for on-site garbage removal, loading areas, and other site plan requirements, we believe that the proposed set-back regulations will need to be amended in most circumstances to practically develop typical sites found in these areas.

TESTING TSA6 ZONE REGULATIONS AGAINST TRICAR'S RIVERWALK PROJECT

We have tested the proposed regulations by applying them to one of our recent developments – Riverwalk at Thames and York Streets - to understand whether it could have been developed without an amendment to the TSA6 Zone proposed for that site. We believe that Staff and Council are very supportive of this development and think it's a reasonable litmus test for the practical application of the TSA Zones. We found the following:

- The Tricar Group's Response to the City of London Heights Framework Study & Proposed TSA Zoning - 7
- It would not conform to the 5m step-back requirement – on the east portion of the building.
- It is unclear how the clause in Section 52.3(7) would apply – “For all buildings greater than 8 storeys, a maximum of 30 percent of the tower can extend to grade is not required to adhere to the step back regulations”. More pointedly, the tower does not extend to grade on the east side of the building, where the 5m step-back would not be met.
- It would also not conform to the 12.5m setback requirement above the eight storey on the east side of the building – adjacent to the existing automobile service station.
- If the site was not a corner property, the existing tower could not be accommodated at all as it would be deficient on the 12.5m setback on the south side.
- Riverwalk has commercial uses above the ground floor – which would not be permitted under the proposed TSA6 Zone which limits commercial uses to the ground floor
- It is unclear how the maximum non-residential uses GFA of 500m² would be applied, but if it applies to the aggregate GFA for the building, Riverwalk would be well in excess of 500m² for non-residential uses.
- Riverwalk currently achieves a FAR of 6.5. This is exactly equal to the maximum FAR permitted in the TSA6 Zone. As such, despite the fact that the TSA6 Zone allows for 45 storeys, the 6.5 FAR regulation would prevent any additional height beyond the current 24 storey tower given the current configuration of Riverwalk. This would represent a limitation to just over half of the height that is permitted by the Zone.
- Riverwalk has a tower floorplate of approximately 2,200m². That is 50% of the maximum tower floorplate of 1,000m² that the the SVN report recommended for Downtown.

In short, the long list of regulatory requirements in the TSA Zone will likely require zoning amendments in most situations and may defeat the very purpose of pre-zoning the lands within these areas. We are requesting that Staff review the regulations,

prioritize them, and reduce them wherever possible to increase flexibility while still addressing important planning and design objectives that will ensure a positive form of development.

PERMITTED USES The list of permitted uses in each TSA zone is very specific. The proposed zones have a long and somewhat confusing list of permitted uses. We think this would be a good opportunity to “roll-up” the permitted uses to a higher category of use that would cover the more detailed range that has been identified. While we understand that the intention is to mirror the existing Z.-1 Zoning By-law approach for listing uses, we believe that more flexibility could be achieved by working with the Zoning Enforcement Team to roll up the range of uses to list only the “highest order” uses that exist in the current by-law that would, by definition, cover the more detailed list of uses identified for each Zone. The Tricar Group’s Response to the City of London Heights Framework Study & Proposed TSA Zoning - 8 We are confident that a more streamlined list of uses from the existing By-law could be used, and still allow for this same range of uses, while also providing flexibility for other similar uses.

RESTRICTION OF RESIDENTIAL USES TO ABOVE THE GROUND FLOOR The permitted uses of the proposed TSA Zones appear to allow residential uses as follows:

- TSA1 (RTC) – Residential allowed on ground floor
- TSA2 (RTC core) – Residential uses allowed only on rear portion of the ground floor
- TSA3 (TV periphery) - Residential allowed on ground floor
- TSA4 (TV core) - Residential uses allowed only on rear portion of the ground floor
- TSA5 (DT periphery) - Residential allowed on ground floor
- TSA6 (DT core) - Residential allowed on ground floor
- TSA7 (DT mainstreet) - Residential uses allowed only on rear portion of the ground floor

In our opinion, this restriction is problematic for a number of reasons:

- There seems to be an inconsistency on where the limitation on ground floor residential uses would be allowed – consider the proposed TSA2 and TSA4 Zones that do not allow for ground floor residential uses at the street front, while the TSA6 Zone does. This doesn’t seem to make sense from a planning policy perspective.
- We understand that Staff are seeking to require commercial uses at grade. However, applying this in an absolute regulation is problematic. The demand for commercial uses is not adequate to fill space along all of these corridors. As noted above, the demand for commercial uses is diminishing as more shopping is done online.
- We note that residential amenity areas, such as outdoor patios, indoor fitness areas, lobbies, community rooms, lounges, etc. can all make for great uses to animate the adjacent street. While they aren’t commercial uses, they are often occupied more hours in a day than commercial spaces and these interior space are similarly visible from the street.
- Many sites are on corners, which would require two street frontages of non-residential uses within the TSA2 and TSA4 Zones. This is not practical to achieve in some cases.
- We recommend that this requirement be maintained for the proposed TSA7 Zone, but that it be eliminated as a regulation for the TSA 2 and 4 Zones. Official Plan policy encourages these non-residential uses at grade, and this could set the basis for a discussion at the site plan stage recognizing other positive alternatives.

RESTRICTION OF NON-RESIDENTIAL USES TO THE GROUND FLOOR Restriction of Non-Residential Uses to Ground Floor or Front Portion of Ground Floor The permitted uses in the TSA Zones restrict non-residential

uses to the ground floor of mixed-use buildings by indicating that "...any of the other uses on the ground floor". The TSA2 and TSA4 Zones only allow for ground floor uses "in the front portion of the ground floor". The Tricar Group's Response to the City of London Heights Framework Study & Proposed TSA Zoning - 9 We do not understand why non-residential uses are limited to the ground floor. Commercial, service-commercial and office uses may be desired and entirely appropriate at a location above the ground floor within the podium of a mixed-use building. A restaurant may want a top floor location with a rooftop patio. What would be the planning argument for preventing these types of uses above the ground floor? We also don't understand why the TSA2 and TSA4 Zones go even further to restrict non-residential uses to the front portion of the ground floor. Why wouldn't it be appropriate for a commercial uses to be located in the rear portion of the building – perhaps with access from the main lobby of a residential building or a rear lane.

Restriction on Gross Floor Area of Non-residential Uses
We don't understand why Staff are proposing a limitation on the size of non-residential uses at 500 m² in Rapid Transit Corridors and Transit Villages. This maximum limit seems too small for these highly urban areas. Similarly, a limit of 800 m² in the Downtown is limiting when considering the size of a typical podium in the Downtown and what could be possible. We don't understand the planning policy intent of this limitation. This could limit opportunities for positive restaurant, retail and service uses that activate the street and generate customer traffic in the Core. It is also unclear whether this maximum GFA for non-residential uses relates to the individual use (eg. tenant), an individual building, or the aggregate for the zone (eg. surrounding a transit station). If it is intended that these maximums relate to individual uses, this should be clarified and this should be consistent for office use regulations as well.

Maximum Gross Floor Area for Non-residential Uses vs. Maximum GFA for Office Uses
Table 52.3 shows a maximum GFA for non-residential uses that is lower than the maximum GFA for office uses. This is confusing as office uses are, in fact, non-residential uses. This should be more clearly stated.

Non-residential Floor Area Ratio
Table 52.3 includes a regulation for a building's non-residential floor area ratio. We think this is unnecessary, very limiting for small sites, and inappropriate as a blanket regulation. Consider a small site in the TSA7 Zone where the building covers almost 100% of the site. The proposed FAR regulation for non-residential uses limit such a building to only approximately 60% of the ground floor area – without any further allowance for non-residential floor space in the building's upper storeys. Why wouldn't the City want to allow for the full use of the ground floor, and even potentially the second floor, for non-residential uses on a commercial streetscape in the TSA7 Zone? Similarly, consider a larger site whereby there is a desire to integrate commercial and office uses into the podium of a mixed-use building. As an example, if the podium covered 80% of the site, the TSA4 which allows for an FAR of up to 0.5 would only allow for about 63% of the ground floor of the podium to be occupied by commercial and/or office uses. It would not allow for any additional space such as office space on the second floor. The Tricar Group's Response to the City of London Heights Framework Study & Proposed TSA Zoning - 10 Furthermore, we do not think that the GFA

regulation is necessary for non-residential floor area. We do not understand the policy objective or planning rationale that this regulation is intended to address.

FRONT YARD DEPTHS We have several comments relating to the proposed front yard depth regulations. **Minimum Front Yard Depth** We note that the minimum front yard depths for the TSA3-TSA7 Zones are for ground floor non-residential uses. We don't see any front yard depth regulations for residential uses. We wonder whether this was intentional – meaning the front yard depth for residential uses would be 0m or if it was an oversight. Even if it was intentional, we think the absence of a regulation could set the groundwork for confusion in the implementation of the zone if it isn't clearly stated. **Missing Maximum Front Yard Depth for TSA4 and TSA7 Zones?** We believe that the draft zone is missing a maximum front yard set-back for the TSA4 and TSA7 Zones. We aren't clear why there are maximums for the TSA3, 5 and 6 Zones in Section 52.3(3), but not the TSA4 and TSA7 Zones. We note that Table 52.3 shows “see Section 52.3(3) for the TSA3 through TSA7 Zones, despite the fact they are not referenced in that section.

EXTERIOR YARD DEPTHS We note that the proposed zoning regulations use the term “exterior yard depths”. We think that this should be modified to “exterior side yard depths” for clarity and consistency with the definitions in the zoning by-law.

REAR YARD DEPTHS **Regulating Rear Yard Depths by Percentage of Building Face** Section 52.3(4) uses a formula which we believe is intended to allow for flexibility in the TSA1 and TSA2 Zones. It allows for a set-back of 7.5m in the rear yard, but also allows for 30% of the building face to be 3.5m from the rear lot line if the remaining 70% of the building face is 10m from the rear lot line. We appreciate the desire to create flexibility, but we wonder if this will create confusion. Section 52.6 requires a 12.5 metre set-back above the eighth storey, which is another layer and it is unclear which requirement would prevail in the TSA2 Zone. We also note that the proposed flexibility would be redundant for shorter buildings. For example, it would not make sense to avail of the 3.5m set-back for one or two floors while setting back 10m for the remaining 4-6 floors as would be required by this regulation. The Tricar Group's Response to the City of London Heights Framework Study & Proposed TSA Zoning - 11

Conflicting Requirements for Rear Yard Depths Section 52.3(4) indicates that rear-yard depths will be a minimum of 7.5m where no lane exists, but 3.5m where one does exist. This seems to conflict with Section 52.3(6) which requires a 12.5m set-back above the eighth storey. It is important to identify which of these sections is paramount. The use of “notwithstanding” language in Section 52.3(4) may help to clarify. Furthermore, we question why a building would be required to have 4m less set-back when the rear lot line is adjacent to a lane, yet still be required to have the full 12.5m set-back above the 8th storey even where it is adjacent to the same lane. Section 52.3(5) establishes a minimum rear yard depth for sites abutting a residential zone. The language doesn't make clear whether this requirement “trumps” the other minimum rear yard set-back requirements for the TSA zones. The last paragraph of Section 52.3(6) is confusing. We think that the first word, “except” should be deleted. “Notwithstanding” language could also be used.

INTERIOR YARD DEPTHS We note that there are no interior yard set-backs for the 1st-7th storeys of buildings within the

TSA Zones that do not abut a residential zone. We aren't sure whether this was intentional, but if it was it should be clarified to avoid confusion. Some of the above comments relating to rear yards would also apply to interior yards. Section 52.3(6) requires interior side-yard depths of 12.5m above the 8th storey in the TSA2-TSA7 Zones. A 35m-40m wide tower within a mid-block location would require 60-65m of lot width, without a step-back from the base to the tower. A step-back of 5m on both sides, as required in the TSA5-7 Zone would mean a lot width of 70-75m would be required. Vacant and redevelopment lots of this width are unusual within the Downtown and along the Rapid Transit Corridors.

STEP-BACK REQUIREMENTS

Regulating Step-backs Versus Guidelines

As noted in our May 1st correspondence, we are concerned with zoning regulations that require specific step-backs. While we understand the design principles behind step-backs, we believe there are multiple ways to break-down massing and create human-scale streetscapes. Furthermore, a zoning regulation approach for step-backs doesn't provide flexibility for using a podium step-back in some portions of a building and using other measures to address a design intention in other portions of a building, with a different design context. We recognize that Section 52.3(7) does allow relief from any step-back for 30% of the tower, but The Tricar Group's Response to the City of London Heights Framework Study & Proposed TSA Zoning - 12 this is extremely limiting – particularly when considering that the podium dimension are often much larger than the dimensions of the tower and also the step-backs appear to apply to all sides of a building – not just the street frontages.

Costs and Practical Issues With Step-backs

While we are not suggesting that step-backs cannot be accommodated in all circumstances, we want to highlight the cost and practical development challenges relating to step-backs – particularly when they are substantial. Depending upon the construction technique, step-backs can require the use of expensive transfer slabs, that are necessary to transfer structural building loads and accommodate the step-back. These transfer slabs are exceedingly thick and very expensive. Furthermore, step-backs can lead to significant issues relating to building load columns interfering with parking spaces and drive aisles in the parking structure portion of buildings. We believe that step-backs should be addressed, as they have been to date, through the site plan approvals process and an understanding of design objectives for a positive pedestrian environment and an approach taken for each development within its surrounding context.

Minimum Step-back of 5.0m in the Downtown (TSA5, 6 and 7 Zones)

In addition to the other step-back concerns identified in this section, we do not agree with a blanket step-back of 5 metres for all Downtown Zones. As noted above, we do not believe this is necessary as a requirement for all buildings in these zones and we do not think it is substantiated as a requirement by sound planning and design arguments.

5.0m set-back Applies To All Yards – Not Just Street Frontages

We are not sure whether it is an oversight, or intentional, but Section 52.3(7) requires a 5.0m step back for all frontages, including interior side-yards and rear yards. As discussed in the below comment, we note that a minimum rear yard and interior side yard depth of 12.5m is required above the 8th storey, which will, in practice, provide a step-back from those two lot lines to provide space from the neighbours of tall buildings without the need for

the additional 5.0m set back from these interior yards. As such, we believe that step-backs should only be applied for those building faces that front public streets. The interior side and rear yards will be addressed through set-backs applied above the 8th storey. Multitude of Step-back Requirements Are Excessive and May Conflict We count at least three regulations relating to step-backs in the proposed zoning: 1. Section 52.3(7) – step-back requirement for 1.5 to 5m 2. Section 52.3(6) – 12.5m set-back for interior side yards and rear yards above the eighth storey (this will serve as a functional step-back for the tower portion of the building). 3. Section 52.3(4) – requires a minimum rear yard depth in the TSA1 and 2 Zones of 3.5m for 30% of the building face and 10.5m for the remaining 70% of the building face (this will serve as a functional step-back of some kind). The Tricar Group's Response to the City of London Heights Framework Study & Proposed TSA Zoning - 13 We question whether all of these step-back requirements are necessary and wonder whether they may conflict with one-another in some instances. Established Street Wall for Determining the Height of the Required Step-back The minimum step back in Section 52.3 (7) uses the term "established street wall". We could not find a definition for this term in the Zoning By-law. We are unclear on how an established street wall would be determined and question whether this is a good measure for a regulation. We think this is a site plan design consideration, rather than something that should be applied in a Zoning regulation. Right of Way Width for Determining the Height of the Required Step-back Section 52.3(7) indicates that the height of the step-back will be established as either the datum line of an established street wall (see above) or 80% of the adjacent road right-of-way. While we understand the design principle behind keeping building podiums at an appropriate pedestrian scale, which can relate to street width, we think this is an inappropriate measure to use in a regulation. Many Downtown development sites are located adjacent to streets of very different widths. Some streets are exceptionally narrow in the Core (eg. Kent Street). Requiring very low podium heights, through regulation, simply because an adjacent street is narrow is inappropriate in our opinion and should be removed. MINIMUM RESIDENTIAL DENSITY IN UNITS PER HA We understand that the intent of this regulation is to avoid the underdevelopment of prime land in transit nodes and corridors. However, we question how relevant this minimum density regulation would really be. Our understanding is that planning applications in urban areas have been for increases to densities that are already well above those densities of 45uph and 60uph proposed for the TSA Zones. Furthermore, with the high cost of land, materials and labour combined with the high demand for housing in London, we cannot think of a case where a developer would be seeking lower densities than the market would support. We think that this minimum residential density regulation is unnecessary and will not have any positive impact. MINIMUM LOT FRONTAGE We note that the current regulation for minimum lot frontage in the DA1 and DA2 Zones is 3.0m. We are not sure what the planning rationale is for requiring 30m of frontage for development in the proposed TSA Zones. Not every development within the TSA1-TSA7 Zones will necessarily be large and there should be room for variability. Furthermore, given the highly irregular lot pattern in these urban areas – eg.

Downtown and Rapid Transit Corridors, requiring 30m of frontage may be excessive. There may be lots that have narrow frontage and open-up into a larger development site deeper into the lot.

DUAL MAXIMUM BUILDING HEIGHT REGULATIONS

We appreciate that Staff are providing two options for maximum height – in storeys and metres. We note that “the maximum building height shall be whichever of the two is less”, which creates a problem in our opinion. More specifically, we believe that the building height in metres is too low to practically achieve the building height in storeys. In general, the heights in metres only allow for 3m of height per storey, beyond the required 4.5m first storey. For example, the TSA4 Zone is proposed to allow for 30 storeys of building height. At 91.5m, with a minimum first storey height of 4.5m, the average floor height would be 3m. We think this is very tight and unnecessarily limiting. This would limit the opportunity for greater ceiling heights in fitness and community rooms above the first floor, penthouse areas, restaurants top floors, office uses above the first floor and greater ceiling heights in units throughout the building. In addition, any step-back creates a terrace condition, which increases the floor-to-floor height at that level, further diminishing the opportunity to achieve the maximum floor count in the zone. As an example, standard construction practices would normally call for a floor-to-floor height of 3.2m. With a 4.5m first storey, a parapet height at 0.6m and two step-backs requiring an additional 0.8m as would be required by the proposed zones, the TSA6 Zone could accommodate only 41 storeys at the allowed 136.5m of height. Thus, the height regulation for the TSA6 Zone in metres provides for a full 4 storeys less than the stated allowable height of 45 storeys for the TSA6 Zone. The divergence would be even greater if the penthouse floor is of greater height, or if commercial uses such as offices are accommodated on additional floors in the podium. We are requesting that the maximum height in metres be re-calibrated to allow for a greater average height that will not unnecessarily limit the intended height of buildings for each zone as expressed in storeys. We are also concerned about the implications of how storeys of parking will be counted. In many cases, the parking component of buildings are significantly lower in height than a residential storey. Given that the maximum height regulations relate to THE LESSER of height in metres or height in storeys, we are concerned that counting parking storeys may substantially impact the allowable building height.

SUMMARY

We want to again express our appreciation to Council and Staff for their efforts to provide more opportunity for more intense residential development throughout London. We believe that the greater heights proposed for the Official Plan will be very beneficial. We are emphatically requesting, however, that heights of up to 8 storeys be permitted along all Civic Boulevards and Urban Thoroughfares without restrictions to the PTA or a handful of locations where Civic Boulevards and Urban Thoroughfares intersect. We also ask the City to consider allowing up to 15 storeys in Shopping Areas as a whole. In both cases, the Zoning By-law can be used to establish where the maximum height allowed by the Official Plan Place Type is appropriate and where it is not. We are also appreciative of the City’s intention to pre-zone lands within the Protected Major Transit Station Areas. Pre-zoning could make a big difference to reduce the risk of acquiring properties for high rise development and could significantly reduce the time required for

planning and development approvals. These can help to reduce the cost of housing and increase housing supply. We would be happy to meet to discuss these matters further should you desire.

August 23, 2024

Re: Heights Framework & TSA Zone - Additional Comments Following August 16th Meeting

The Tricar team would like to thank you for the meeting you hosted on Friday, August 16th regarding the proposed changes to the Official Plan and Zoning By-law to accommodate greater heights and densities across London. The meeting was very informative.

We provided a detailed range of comments in our correspondence to N. Pasato, submitted on August 12th, 2024. We want to acknowledge and express our gratitude that Planning Staff have addressed a significant number of our concerns. Thank you for listening to the feedback of ourselves and others and making changes to fine tune the proposed policies and zoning.

With what we learned on Friday, we are offering this second round comments. The comments that follow should be read **together with** our August 12th comments (attached as Appendix 1) and should not be considered a replacement or consolidation of those previous comments.

8 STOREYS IN THE NEIGHBOURHOOD PLACE TYPE ALONG MAJOR STREETS

We remain concerned with the proposed heights for sites in the Neighbourhood Place Type located outside of the PTA and not at the intersection of major streets. We expressed our concerns at the meeting and, further to Mr. Adema's request, we have provided examples of 7 & 8 storey mid-rise apartments outside the PTA (this has been provided under separate cover). In summary, our planning opinion is:

- Requiring an Official Plan amendment for mid-rise buildings of 7-8 storeys outside of the PTA and off of major street intersections defeats the purpose of streamlining processes for appropriate forms of housing development.
- We note that Mr. Adema expressly cited the intent to avoid the need for Official Plan amendments that are unnecessary from a planning perspective.
- Allowing for mid-rise apartments of up to 8 storeys of height along major streets and outside of the PTA represents good planning.
- The Zoning By-law is the appropriate tool to determine which sites are appropriate to avail of the upper range of the mid-rise height range and this can be achieved either through pre-zoning (ReThink Zoning process) or via site-specific planning applications.
- Requiring an Official Plan amendment for 8 storeys of height at appropriate locations outside of the PTA undermines the goal of facilitating more housing supply

We are requesting that the following changes be made to the proposed Table 11.



Neighbourhoods Heights Framework (Table 11)

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	Fronting onto Park
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. 3 Max. 4 in PTA	Same as base	Min. 2 Max. 3 Max. 6 in PTA	Min. 2 Max. 3 Max. 8 in PTA	Min. 2 Max. 3 Max. 8 in PTA	Min. 2 Max. 4
Civic Boulevard and Urban Thoroughfare	Min. 2 Max. 6 Max. 8 in PTA	Same as base	Same as base	Min. 2 Max. 8 Same as base	Min. 2 Max. 8 Same as base	Same as base

We note that the LDI has also requested this change and others we have communicated with in the development industry are supportive of our request.

METHOD FOR IMPLEMENTING THE DUAL ZONE (OVERLAY) APPROACH

We have provided a thorough review of our concern on this topic in the attached comments from August 12th. There remain a number of questions regarding the way certain issues will be addressed if the TSA Zone is applied as an overlay to the existing zoning:

1. How will amendments to the existing zoning be handled relative to the overlay zoning? We are aware of some existing zones that allow for greater heights than the overlay zoning. If an amendment is sought to the existing zoning through a planning application to something like residential density (uph), will the height of the overlay zoning become the new standard or expectation for maximum height?
2. Similar to the issue above, how would set-back requirements be treated where an amendment is sought for something like residential density in the existing zoning? Set-backs are greater in the overlay zone than they are in the existing zoning in some cases – will these set-backs be sought out for amendments going forward?

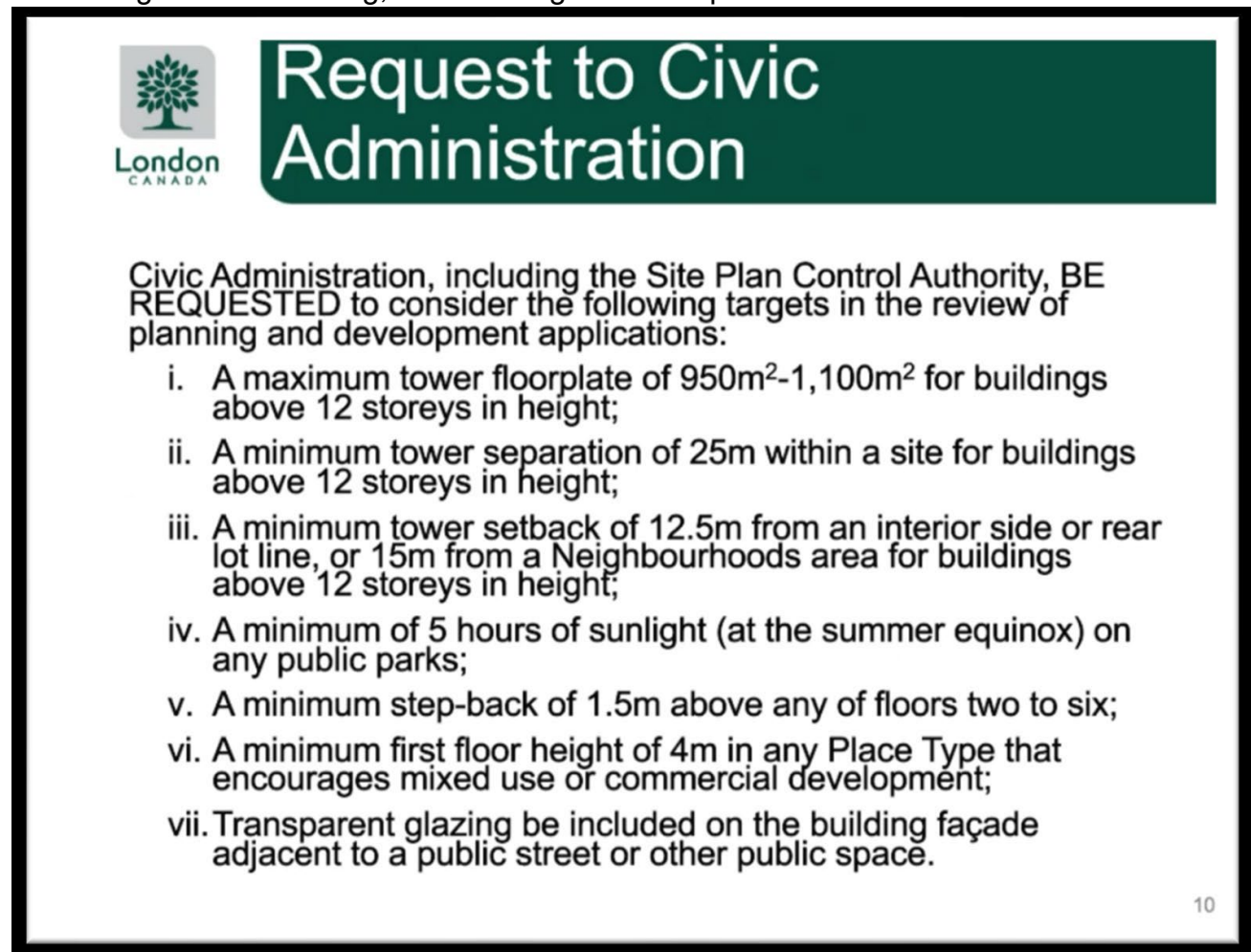
3. How do set-backs to residential zones work in the overlay zone, if the underlying zone of adjacent properties is residential, but the overlay zone applies the transit station area zone to these adjacent properties?


PROPOSED APPROACH FOR ADDRESSING DESIGN MATTERS IDENTIFIED BY SVN

Many of the issues identified in the SVN report are not included in the proposed TSA Zoning. We appreciate that the following items have not been included as a regulatory requirement in the TSA Zone:

- Maximum tower floorplate
- Minimum tower separation
- Minimum tower set-back
- Minimum sunlight on adjacent parks
- Minimum step back above floors 2-6
- Minimum first floor height
- Minimum transparent glazing

We agree that these should be items considered through the site plan process. At the August 16th meeting, the following slide was presented:



 **Request to Civic Administration**

Civic Administration, including the Site Plan Control Authority, BE REQUESTED to consider the following targets in the review of planning and development applications:

- A maximum tower floorplate of 950m²-1,100m² for buildings above 12 storeys in height;
- A minimum tower separation of 25m within a site for buildings above 12 storeys in height;
- A minimum tower setback of 12.5m from an interior side or rear lot line, or 15m from a Neighbourhoods area for buildings above 12 storeys in height;
- A minimum of 5 hours of sunlight (at the summer equinox) on any public parks;
- A minimum step-back of 1.5m above any of floors two to six;
- A minimum first floor height of 4m in any Place Type that encourages mixed use or commercial development;
- Transparent glazing be included on the building façade adjacent to a public street or other public space.

10

We are not in agreement with this approach for the following reasons:

1. Despite the use of the word “targets”, we are concerned that these identified maximums and minimums will become de facto regulations through the implementation of the site plan process. We think strong language is required to acknowledge that these numbers represent best practices, but alternatives will be accepted if the underlying objectives of the design requirement are achieved.

2. It would be useful if there was a summary of the key underlying objective(s) for each design requirement – so that alternative approaches could be measured against these objectives. This would provide flexibility, but also some certainty around what is being sought out. It would also bolster the idea that the numerical maximums and minimums are not regulatory standards.

3. We note that the most recent proposed zone (August 15) includes a step-back requirement. We don't think it's appropriate to require a step back in BOTH a zoning regulation and through a site plan “guideline”. We note that there is a difference between the language used in section 52.3(3) of the TSA Zone and the proposed wording on the above slide presented on August 16th.

4. Similarly, we note that the Table 52.3 includes a regulation relating to first storey height and the above slide presented on August 16th also includes this provision. Once again, we believe it is inappropriate to duplicate a regulation from the zoning by-law in a site plan guideline.

5. We question whether it is appropriate to have a standing Council resolution giving direction for City-wide site plan reviews. While a Council resolution giving direction for an individual property may be appropriate, a resolution that applies to the City as a whole over an indefinite, but very long, time period is not transparent and doesn't follow what should be expected – either a guideline document or a direction in the site plan design manual that is attached to the site plan by-law.

6. As we noted in the attached correspondence we think that a minimum of 5 hours of sunlight will be difficult to implement. How will areas already shaded by other buildings or by large trees affect this requirement?

TOWER SIDE AND REAR-YARD SET-BACKS

In our August 12th (attached) correspondence we outlined our concerns in detail regarding the proposed tower set-back of 12.5m from an interior side yard or rear yard. A tower with a modest width of 12m would require a mid-block lot width of 37m. We think this will eliminate a lot of development opportunities in mid-block locations. Most narrow lots will be impossible to develop with this tower setback requirement.

REQUIREMENTS RELATING TO LOCATION OF PERMITTED USES

Once again, our August 12th correspondence (attached) goes to great lengths to detail our concerns regarding the restriction of residential uses to above the ground floor and restriction non-residential uses to the ground floor. We cannot understand why non-residential uses would be restricted to the ground floor - this is required based on the wording of the permitted uses in the proposed TSA Zones. We think that the wording associated with the permitted uses should be reviewed and fine-tuned.

We are concerned about the restriction on residential uses on the ground floor of the TSA2 and TSA4 Zones. If read literally, this wouldn't allow for a lobby on the ground floor of a mixed use building. Furthermore, other uses such as lobbies, fitness rooms, community rooms, and even outdoor patios can animate the street. As pointed out in our earlier correspondence, these other uses are often active much later into the evening and can do a better job of animating the street in the evenings. If residential at grade is acceptable to Staff in the TSA1,3, 5 and 6 Zones why wouldn't it be acceptable in the TSA4 Zone or the TSA2 Zone. We can understand the rationale in the TSA7 Zone.

STEP BACK REQUIREMENTS

Please see our previous submission (attached) that outlines our concerns regarding step back requirements. We remain concerned. The step back requirement was in the original proposed TSA Zone, but not in the updated version on the web site from August 8 to 15th. We were pleased that it had been moved out of the zoning regulations. However, it appeared as a regulation again in the August 15th version posted online. We think that the regulation should be removed in favour of including step back in the site plan discussions – perhaps with the targets to be identified for other design considerations.

SUMMARY

We want to thank Staff, once again, for the improvements that have been made to the policies and TSA Zones proposed to date. We would happy to discuss the above and the attached if that would be helpful.

Sincerely,

John M. Fleming, MCIP, RPP

REDACTED

Re: Heights Framework Review and Protected Major Transit Station Areas Zoning Review

MANY POSITIVE CHANGES PROPOSED BY STAFF

We submitted a letter to you and your team on May 1, 2024 providing feedback, requests and recommendations relating to the London Heights Framework Review. We also participated in group meetings and one-on-one meetings with City Staff and their planning consultant early in the process.

We would like to take this opportunity to acknowledge and express our appreciation for the many positive changes that City Staff are bringing forward – many in keeping with the changes that we requested through these early stages of the process.

Given the significant changes in demographics, housing demands and the current and anticipated continuation of the housing crisis in London and Canada as a whole, we

appreciate that the City has proposed greater residential building heights in many Place Types. The increased heights Staff are proposing through amendments to the London Plan represent a very positive move and we would like to thank Staff and Council for moving in this direction.

Similarly, we applaud the City's move to pre-zone lands to apply these greater heights – taking the first step towards implementation through the creation and application of a Transit Station Area (TSA) Zone for the Protected Major Transit Station Areas. We support the City's goal to apply zoning that will allow for as-of-right development without the need for a zoning amendment, thus providing greater certainty that tall buildings will be permitted and shortening the development approvals process considerably.

We do, however, believe there remain several important issues to be addressed relating to Staff's proposed Official Plan and Zoning changes, to create a clear and effective path for more housing to be built in London. The following submission outlines our concerns and suggestions.

OFFICIAL PLAN CONSIDERATIONS

DRAFT POLICIES NOT AVAILABLE FOR REVIEW AND FEEDBACK

We are concerned that, while the heights proposed for various Place Types have been identified, we have yet to see any proposed Official Plan policies for review. We are unclear on what text changes are proposed to existing Official Plan policies that may come with these greater heights.

The SVN Report speaks to a number of regulatory measures relating to building envelope and built form and we believe it would be a mistake to include these measures within Official Plan policies. Our earlier correspondence of May 1, 2024 emphasized the "importance of flexibility in Official Plan policy" and avoiding numerical standards in policy that would require amendments, "tying up staff time, delaying good projects and substantially increasing the cost of development through application fees and additional development financing costs."

While we have a good understanding of the amendments to height that are being proposed for each Place Type, we have not seen the text amendments that go with these changes. The deadline for public comments relating to the proposed Official Plan amendments is less than a week away, and yet the proposed Official Plan amendments have not yet been made available.

8 STOREYS IN THE NEIGHBOURHOOD PLACE TYPE ALONG MAJOR STREETS

We have reviewed the proposed heights framework for the Neighbourhood Place Type as shown below.



Draft Amendments to The London Plan

- Neighbourhoods Heights Framework (Table 11)

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	Fronting onto Park
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. 3 Max. 4 in PTA	Same as base	Min. 2 Max. 3 Max. 6 in PTA	Min. 2 Max. 3 Max. 8 in PTA	Min. 2 Max. 3 Max. 8 in PTA	Min. 2 Max. 4
Civic Boulevard and Urban Thoroughfare	Min. 2 Max. 6 Max. 8 in PTA	Same as base	Same as base	Min. 2 Max. 8	Min. 2 Max. 8	Same as base

We think it is a major mistake to limit heights in the Neighbourhood Place Type to 6 storeys along Civic Boulevards and Urban Thoroughfares (major streets). An important goal for providing more housing supply in London is to clear an easier path for mid-rise development.

The Official Plan defines mid-rise development as buildings of up to 8 storeys, with high rise development being 9 storeys or greater. Despite this, the proposed policies would limit mid-rise development to 6 storeys outside the Primary Transit Area, with the exception of a limited number of sites that are located at the intersection of two major streets. We cannot understand the rationale for this unnecessary constraint to housing supply and we are requesting that Table 11 of the London Plan be amended to allow for mid-rise development up to 8 storeys along Civic Boulevards and Urban Thoroughfares outside the Primary Transit Area.

We want to clarify that this does not mean that all sites along Civic Boulevards and Urban Thoroughfares would be allowed this maximum height provided by Official Plan policy. Rather, it would only set a policy ceiling of 8 storeys so that an Official Plan amendment would not be required for those sites on Civic Boulevards and Urban Thoroughfares that are appropriate for such height. As you know, the “hill to climb” is much more expensive and difficult when a zoning amendment AND an Official Plan

amendment is required. To avoid unnecessary and detrimental limitation on housing supply, the Official Plan should have a vision of allowing for mid-rise development – defined by the Official Plan as up to 8 storeys - along all Civic Boulevards and Urban Throughfares. As is the case for all Place Types, the Zoning By-law will establish where this full height will, and will not, be allowed.

Finally, we want to point out that the “peanut butter” argument of directing high-rise development to the Primary Transit Area doesn’t apply to mid-rise development. We don’t believe that limiting mid-rise development to the Primary Transit Area is appropriate nor justifiable from a planning perspective.

SHOPPING AREAS

We appreciate the proposal to open up the Shopping Area Place Type for greater height and density. With changes in shopping behaviours and the reduced demand for bricks and mortar shopping facilities, there are many weak Shopping Areas in London that could be re-developed as mixed use facilities. These centres are typically well serviced by transit and many have sites large enough for tall buildings.

While we understand the approach of establishing major and minor shopping areas to allow for greater heights in the former, we think that this distinction is unnecessary as the London Plan already makes this distinction, but in a different way. The London Plan allows for smaller scale commercial uses in the Neighbourhood Place Type at the identified in Table 10. These are not identified as Shopping Areas on Map 1 of the London Plan. So, in essence, those sites that are identified as Shopping Areas are major shopping areas.

With the changes being proposed, the greatest heights and densities will continue to be located in the Downtown, Transit Villages, and Rapid Transit Corridors -supporting the vision for highly urban and dense residential neighbourhoods where transit services are greatest. Allowing for greater heights along Urban Corridors (as proposed up to 15 storeys) and at shopping centres (proposed up to 15 storeys) makes good sense. However, there are many Shopping Areas that represent good candidates for this greater height. Why wouldn’t the City want to see one or two residential towers (up to 15 storeys) at sites like Oakridge Mall, Colonel Talbot/Southdale, West 5, Wonderland/Commissioners or Highbury and Fanshawe? We understand that there are some small commercial sites designated as Shopping Area Place Types that would not be appropriate for this height, but that is where the Zoning By-law would be used to establish an appropriate height based on lot size, FAR and set-backs.

We think that the City should consider allowing for up to 15 storeys of height in all Shopping Areas. As it made clear in the Official Plan, zoning for this full range of heights would not necessarily be allowed in all situations and would be established through the zoning by-law.

ZONING FOR HIGHRISE BUILDINGS & PROPOSED TRANSIT STATION AREA ZONE ZONING REGULATION RECOMMENDATIONS IN THE SVN REPORT

We note that there are several recommendations made in the SVN report that cause concern. These include such measures as:

- Minimum tower separation

- Maximum tower floorplate
- Minimum 5 hours of sunlight in public parks
- Minimum glazing for building facades
- Etc.

We appreciate that Staff have not included many of these measures in the regulations of the proposed TSA Zone. We believe that these measures are not appropriate for the Zoning By-law and should be addressed on a site-specific basis through the site plan process. Some of these matters could be addressed through guidelines, but if this is the case, they should not be treated as requirements or de facto regulations.

We would also note that a maximum tower floorplate regulation of 1,100 m² is about half of the tower portion of Riverwalk – which has garnered awards and positive feedback from Council and across the industry. This clearly illustrates the problem with instituting a maximum tower floorplate as a zoning regulation – particularly with the City’s goal of avoiding zoning amendments wherever possible.

We are hopeful that the same approach – to not include such measures as Zoning regulations - is planned for the Zoning review being undertaken for lands beyond the proposed TSA Zone, to be addressed through the Rethink Zoning process.

METHOD FOR IMPLEMENTING DUAL ZONE APPROACH NEEDS CLARIFICATION

Our understanding is that approach proposed by Staff is to leave the existing zoning in place and apply the Transit Station Area Zone as a dual or compound zone. It isn’t fully clear, however, how this will be implemented.

For example, most sites in the Downtown have zoning in place that don’t address many of the set-back, step back, floor area ratio, or other regulatory measures in the new TSA Zone. However, these existing zones typically have unit/ha density regulations that are exceedingly low (eg. 250uph) and, as a matter of course, require a zoning amendment to achieve a reasonable development density for tall buildings. How is the City intending to address such an amendment to the existing zone, where the TSA Zone is also applied? Would an amendment to the existing zone be supported, if it doesn’t address the step-back, floor area ratio or set-back requirements of the TSA Zone? Our concern is that the TSA Zone may establish additional expectations or requirements that don’t currently exist and these would be brought up as requirements through any zoning amendment process.

We can provide a specific example of such a property that we have recently had discussions on together with the City. The new TSA Zone applied to this site actually represents a “down zoning” in terms of permitted height (20 storeys vs. approximately 30 storeys). Staff may suggest that this doesn’t matter because the existing zoning remains. However, if a zoning amendment application were to be submitted for increased density, how would the height in the TSA Zone affect the opinion of the public, staff and Council in that application process?

Another question we have, is whether there is an intention is to eventually remove the existing zoning in favour of the Transit Station Area Zoning over the long term?

SERVICING AND THE H-213 HOLDING PROVISION

We note that the H-213 Zone has been applied to all the zones noted in the draft mapping for the TSA Zone. We have not seen the text for this holding provision. Consistent with the above commentary, we wonder if this holding provision will apply to a use allowed under the existing DA Zone that does not have an existing holding provision.

Perhaps the larger point, is how development proposals will get “into the queue” for servicing in the Core area. Given the scarcity of servicing capacity in the Core, it will be important that servicing is not allocated for projects until the site plan approval stage and that sunset provisions are applied to the allocation of servicing. It is imperative that servicing is not reserved for “paper projects” at the expense of “real projects” that are marching through the site plan and building permit approvals process and ready to proceed within a reasonable timeframe.

COMPLEXITY OF REGULATIONS IN TSA ZONE COULD UNDERMINE GOAL OF PRE-ZONING AND STREAMLINING PROCESSES

In general, we feel that Staff are proposing too many regulations in the TSA Zone, that will invariably lead to the very thing they are seeking to avoid – compulsory rezonings in practice. The TSA Zone includes a very broad range of regulations, including:

- Maximum building height in metres
- Maximum building height in storeys
- Minimum building height of first storey
- Minimum front yard depths for ground-floor non-residential uses
- Maximum front yard depths
- Minimum rear yard depths for certain percentages of the building face
- Minimum rear yard depths abutting a residential zone
- Minimum interior yard depths
- Exterior yard depths
- Minimum rear yard depths above the 8th storey
- Minimum interior yard depths above the 8th storey
- Minimum step back where there is a street wall
- Maximum gross floor area of non-residential uses
- Maximum non-residential floor area ratio
- Maximum gross floor area for offices
- Maximum floor area ratio for building as a whole
- Minimum density in units per hectare
- Minimum lot frontage
- Minimum amenity area
- Landscaped open space
- Lot coverage
- Location of surface parking
- Location of structure parking

This long list of regulations will make many sites impractical to develop within the context of the standard TSA Zone. Many of the sites within these highly urban areas are

relatively small, shallow, irregularly shaped, and difficult to develop. Together with current requirements for on-site garbage removal, loading areas, and other site plan requirements, we believe that the proposed set-back regulations will need to be amended in most circumstances to practically develop typical sites found in these areas.

TESTING TSA6 ZONE REGULATIONS AGAINST TRICAR'S RIVERWALK PROJECT

We have tested the proposed regulations by applying them to one of our recent developments – Riverwalk at Thames and York Streets - to understand whether it could have been developed without an amendment to the TSA6 Zone proposed for that site. We believe that Staff and Council are very supportive of this development and think it's a reasonable litmus test for the practical application of the TSA Zones. We found the following:

- It would not conform to the 5m step-back requirement – on the east portion of the building.
- It is unclear how the clause in Section 52.3(7) would apply – “For all buildings greater than 8 storeys, a maximum of 30 percent of the tower can extend to grade is not required to adhere to the step back regulations”. More pointedly, the tower does not extend to grade on the east side of the building, where the 5m step-back would not be met.
- It would also not conform to the 12.5m setback requirement above the eight storey on the east side of the building – adjacent to the existing automobile service station.
- If the site was not a corner property, the existing tower could not be accommodated at all as it would be deficient on the 12.5m setback on the south side.
- Riverwalk has commercial uses above the ground floor – which would not be permitted under the proposed TSA6 Zone which limits commercial uses to the ground floor
- It is unclear how the maximum non-residential uses GFA of 500m² would be applied, but if it applies to the aggregate GFA for the building, Riverwalk would be well in excess of 500m² for non-residential uses.
- Riverwalk currently achieves a FAR of 6.5. This is exactly equal to the maximum FAR permitted in the TSA6 Zone. As such, despite the fact that the TSA6 Zone allows for 45 storeys, the 6.5 FAR regulation would prevent any additional height beyond the current 24 storey tower given the current configuration of Riverwalk. This would represent a limitation to just over half of the height that is permitted by the Zone.
- Riverwalk has a tower floorplate of approximately 2,200m². That is 50% of the maximum tower floorplate of 1,000m² that the the SVN report recommended for Downtown.

In short, the long list of regulatory requirements in the TSA Zone will likely require zoning amendments in most situations and may defeat the very purpose of pre-zoning the lands within these areas. We are requesting that Staff review the regulations, prioritize them, and reduce them wherever possible to increase flexibility while still addressing important planning and design objectives that will ensure a positive form of development.

PERMITTED USES

The list of permitted uses in each TSA zone is very specific. The proposed zones have a long and somewhat confusing list of permitted uses. We think this would be a good opportunity to “roll-up” the permitted uses to a higher category of use that would cover the more detailed range that has been identified.

While we understand that the intention is to mirror the existing Z.-1 Zoning By-law approach for listing uses, we believe that more flexibility could be achieved by working with the Zoning Enforcement Team to roll up the range of uses to list only the “highest order” uses that exist in the current by-law that would, by definition, cover the more detailed list of uses identified for each Zone.

We are confident that a more streamlined list of uses from the existing By-law could be used, and still allow for this same range of uses, while also providing flexibility for other similar uses.

RESTRICTION OF RESIDENTIAL USES TO ABOVE THE GROUND FLOOR

The permitted uses of the proposed TSA Zones appear to allow residential uses as follows:

- TSA1 (RTC) – Residential allowed on ground floor
- TSA2 (RTC core) – Residential uses allowed only on rear portion of the ground floor
- TSA3 (TV periphery) - Residential allowed on ground floor
- TSA4 (TV core) - Residential uses allowed only on rear portion of the ground floor
- TSA5 (DT periphery) - Residential allowed on ground floor
- TSA6 (DT core) - Residential allowed on ground floor
- TSA7 (DT mainstreet) - Residential uses allowed only on rear portion of the ground floor

In our opinion, this restriction is problematic for a number of reasons:

- There seems to be an inconsistency on where the limitation on ground floor residential uses would be allowed – consider the proposed TSA2 and TSA4 Zones that do not allow for ground floor residential uses at the street front, while the TSA6 Zone does. This doesn't seem to make sense from a planning policy perspective.
- We understand that Staff are seeking to require commercial uses at grade. However, applying this in an absolute regulation is problematic. The demand for commercial uses is not adequate to fill space along all of these corridors. As noted above, the demand for commercial uses is diminishing as more shopping is done online.
- We note that residential amenity areas, such as outdoor patios, indoor fitness areas, lobbies, community rooms, lounges, etc. can all make for great uses to animate the adjacent street. While they aren't commercial uses, they are often occupied more hours in a day than commercial spaces and these interior spaces are similarly visible from the street.
- Many sites are on corners, which would require two street frontages of non-residential uses within the TSA2 and TSA4 Zones. This is not practical to achieve in some cases.
- We recommend that this requirement be maintained for the proposed TSA7 Zone, but that it be eliminated as a regulation for the TSA 2 and 4 Zones. Official Plan policy

encourages these non-residential uses at grade, and this could set the basis for a discussion at the site plan stage recognizing other positive alternatives.

RESTRICTION OF NON-RESIDENTIAL USES TO THE GROUND FLOOR

Restriction of Non-Residential Uses to Ground Floor or Front Portion of Ground Floor

The permitted uses in the TSA Zones restrict non-residential uses to the ground floor of mixed-use buildings by indicating that "...any of the other uses on the ground floor". The TSA2 and TSA4 Zones only allow for ground floor uses "in the front portion of the ground floor".

We do not understand why non-residential uses are limited to the ground floor. Commercial, service-commercial and office uses may be desired and entirely appropriate at a location above the ground floor within the podium of a mixed-use building. A restaurant may want a top floor location with a rooftop patio. What would be the planning argument for preventing these types of uses above the ground floor? We also don't understand why the TSA2 and TSA4 Zones go even further to restrict non-residential uses to the front portion of the ground floor. Why wouldn't it be appropriate for a commercial uses to be located in the rear portion of the building – perhaps with access from the main lobby of a residential building or a rear lane.

Restriction on Gross Floor Area of Non-residential Uses

We don't understand why Staff are proposing a limitation on the size of non-residential uses at 500 m² in Rapid Transit Corridors and Transit Villages. This maximum limit seems too small for these highly urban areas. Similarly, a limit of 800 m² in the Downtown is limiting when considering the size of a typical podium in the Downtown and what could be possible. We don't understand the planning policy intent of this limitation. This could limit opportunities for positive restaurant, retail and service uses that activate the street and generate customer traffic in the Core.

It is also unclear whether this maximum GFA for non-residential uses relates to the individual use (eg. tenant), an individual building, or the aggregate for the zone (eg. surrounding a transit station). If it is intended that these maximums relate to individual uses, this should be clarified and this should be consistent for office use regulations as well.

Maximum Gross Floor Area for Non-residential Uses vs. Maximum GFA for Office Uses

Table 52.3 shows a maximum GFA for non-residential uses that is lower than the maximum GFA for office uses. This is confusing as office uses are, in fact, non-residential uses. This should be more clearly stated.

Non-residential Floor Area Ratio

Table 52.3 includes a regulation for a building's non-residential floor area ratio. We think this is unnecessary, very limiting for small sites, and inappropriate as a blanket regulation.

Consider a small site in the TSA7 Zone where the building covers almost 100% of the site. The proposed FAR regulation for non-residential uses limit such a building to only

approximately 60% of the ground floor area – without any further allowance for non-residential floor space in the building’s upper storeys. Why wouldn’t the City want to allow for the full use of the ground floor, and even potentially the second floor, for non-residential uses on a commercial streetscape in the TSA7 Zone?

Similarly, consider a larger site whereby there is a desire to integrate commercial and office uses into the podium of a mixed-use building. As an example, if the podium covered 80% of the site, the TSA4 which allows for an FAR of up to 0.5 would only allow for about 63% of the ground floor of the podium to be occupied by commercial and/or office uses. It would not allow for any additional space such as office space on the second floor.

Furthermore, we do not think that the GFA regulation is necessary for non-residential floor area. We do not understand the policy objective or planning rationale that this regulation is intended to address.

FRONT YARD DEPTHS

We have several comments relating to the proposed front yard depth regulations.

Minimum Front Yard Depth

We note that the minimum front yard depths for the TSA3-TSA7 Zones are for ground floor non-residential uses. We don’t see any front yard depth regulations for a residential uses. We wonder whether this was intentional – meaning the front yard depth for residential uses would be 0m or if it was an oversight. Even if it was intentional, we think the absence of a regulation could set the groundwork for confusion in the implementation of the zone if it isn’t clearly stated.

Missing Maximum Front Yard Depth for TSA4 and TSA7 Zones?

We believe that the draft zone is missing a maximum front yard set-back for the TSA4 and TSA7 Zones. We aren’t clear why there are maximums for the TSA3, 5 and 6 Zones in Section 52.3(3), but not the TSA4 and TSA7 Zones. We note that Table 52.3 shows “see Section 52.3(3) for the TSA3 through TSA7 Zones, despite the fact they are not referenced in that section.

EXTERIOR YARD DEPTHS

We note that the proposed zoning regulations use the term “exterior yard depths”. We think that this should be modified to “exterior side yard depths” for clarity and consistency with the definitions in the zoning by-law.

REAR YARD DEPTHS

Regulating Rear Yard Depths by Percentage of Building Face

Section 52.3(4) uses a formula which we believe is intended to allow for flexibility in the TSA1 and TSA2 Zones. It allows for a set-back of 7.5m in the rear yard, but also allows for 30% of the building face to be 3.5m from the rear lot line if the remaining 70% of the building face is 10m from the rear lot line.

We appreciate the desire to create flexibility, but we wonder if this will create confusion. Section 52.6 requires a 12.5 metre set-back above the eighth storey, which is another layer and it is unclear which requirement would prevail in the TSA2 Zone.

We also note that the proposed flexibility would be redundant for shorter buildings. For example, it would not make sense to avail of the 3.5m set-back for one or two floors

while setting back 10m for the remaining 4-6 floors as would be required by this regulation.

Conflicting Requirements for Rear Yard Depths

Section 52.3(4) indicates that rear-yard depths will be a minimum of 7.5m where no lane exists, but 3.5m where one does exist. This seems to conflict with Section 52.3(6) which requires a 12.5m set-back above the eighth storey. It is important to identify which of these sections is paramount. The use of “notwithstanding” language in Section 52.3(4) may help to clarify.

Furthermore, we question why a building would be required to have 4m less set-back when the rear lot line is adjacent to a lane, yet still be required to have the full 12.5m set-back above the 8th storey even where it is adjacent to the same lane.

Section 52.3(5) establishes a minimum rear yard depth for sites abutting a residential zone. The language doesn't make clear whether this requirement “trumps” the other minimum rear yard set-back requirements for the TSA zones.

The last paragraph of Section 52.3(6) is confusing. We think that the first word, “except” should be deleted. “Notwithstanding” language could also be used.

INTERIOR YARD DEPTHS

We note that there are no interior yard set-backs for the 1st-7th storeys of buildings within the TSA Zones that do not abut a residential zone. We aren't sure whether this was intentional, but if it was it should be clarified to avoid confusion.

Some of the above comments relating to rear yards would also apply to interior yards. Section 52.3(6) requires interior side-yard depths of 12.5m above the 8th storey in the TSA2-TSA7 Zones. A 35m-40m wide tower within a mid-block location would require 60-65m of lot width, without a step-back from the base to the tower. A step-back of 5m on both sides, as required in the TSA5-7 Zone would mean a lot width of 70-75m would be required. Vacant and redevelopment lots of this width are unusual within the Downtown and along the Rapid Transit Corridors.

STEP-BACK REQUIREMENTS

Regulating Step-backs Versus Guidelines

As noted in our May 1st correspondence, we are concerned with zoning regulations that require specific step-backs. While we understand the design principles behind step-backs, we believe there are multiple ways to break-down massing and create human-scale streetscapes.

Furthermore, a zoning regulation approach for step-backs doesn't provide flexibility for using a podium step-back in some portions of a building and using other measures to address a design intention in other portions of a building, with a different design context. We recognize that Section 52.3(7) does allow relief from any step-back for 30% of the tower, but this is extremely limiting – particularly when considering that the podium dimension are often much larger than the dimensions of the tower and also the step-backs appear to apply to all sides of a building – not just the street frontages.

Costs and Practical Issues With Step-backs

While we are not suggesting that step-backs cannot be accommodated in all circumstances, we want to highlight the cost and practical development challenges

relating to step-backs – particularly when they are substantial. Depending upon the construction technique, step-backs can require the use of expensive transfer slabs, that are necessary to transfer structural building loads and accommodate the step-back. These transfer slabs are exceedingly thick and very expensive. Furthermore, step-backs can lead to significant issues relating to building load columns interfering with parking spaces and drive aisles in the parking structure portion of buildings. We believe that step-backs should be addressed, as they have been to date, through the site plan approvals process and an understanding of design objectives for a positive pedestrian environment and an approach taken for each development within its surrounding context.

Minimum Step-back of 5.0m in the Downtown (TSA5, 6 and 7 Zones)

In addition to the other step-back concerns identified in this section, we do not agree with a blanket step-back of 5 metres for all Downtown Zones. As noted above, we do not believe this is necessary as a requirement for all buildings in these zones and we do not think it is substantiated as a requirement by sound planning and design arguments.

5.0m set-back Applies To All Yards – Not Just Street Frontages

We are not sure whether it is an oversight, or intentional, but Section 52.3(7) requires a 5.0m step back for all frontages, including interior side-yards and rear yards. As discussed in the below comment, we note that a minimum rear yard and interior side yard depth of 12.5m is required above the 8th storey, which will, in practice, provide a step-back from those two lot lines to provide space from the neighbours of tall buildings without the need for the additional 5.0m set back from these interior yards.

As such, we believe that step-backs should only be applied for those building faces that front public streets. The interior side and rear yards will be addressed through set-backs applied above the 8th storey.

Multitude of Step-back Requirements Are Excessive and May Conflict

We count atleast three regulations relating to step-backs in the proposed zoning:

1. Section 52.3(7) – step-back requirement for 1.5 to 5m
2. Section 52.3(6) – 12.5m set-back for interior side yards and rear yards above the eighth storey (this will serve as a functional step-back for the tower portion of the building).
3. Section 52.3(4) – requires a minimum rear yard depth in the TSA1 and 2 Zones of 3.5m for 30% of the building face and 10.5m for the remaining 70% of the building face (this will serve as a functional step-back of some kind).

We question whether all of these step-back requirements are necessary and wonder whether they may conflict with one-another in some instances.

Established Street Wall for Determining the Height of the Required Step-back

The minimum step back in Section 52.3 (7) uses the term “established street wall”. We could not find a definition for this term in the Zoning By-law. We are unclear on how an established street wall would be determined and question whether this is a good measure for a regulation. We think this is a site plan design consideration, rather than something that should be applied in a Zoning regulation.

Right of Way Width for Determining the Height of the Required Step-back

Section 52.3(7) indicates that the height of the step-back will be established as either the datum line of an established street wall (see above) or 80% of the adjacent road right-of-way. While we understand the design principle behind keeping building podiums at an appropriate pedestrian scale, which can relate to street width, we think this is an inappropriate measure to use in a regulation. Many Downtown development sites are located adjacent to streets of very different widths. Some streets are exceptionally narrow in the Core (eg. Kent Street). Requiring very low podium heights, through regulation, simply because an adjacent street is narrow is inappropriate in our opinion and should be removed.

MINIMUM RESIDENTIAL DENSITY IN UNITS PER HA

We understand that the intent of this regulation is to avoid the underdevelopment of prime land in transit nodes and corridors. However, we question how relevant this minimum density regulation would really be. Our understanding is that planning applications in urban areas have been for increases to densities that are already well above those densities of 45uph and 60uph proposed for the TSA Zones. Furthermore, with the high cost of land, materials and labour combined with the high demand for housing in London, we cannot think of a case where a developer would be seeking lower densities than the market would support. We think that this minimum residential density regulation is unnecessary and will not have any positive impact.

MINIMUM LOT FRONTAGE

We note that the current regulation for minimum lot frontage in the DA1 and DA2 Zones is 3.0m. We are not sure what the planning rationale is for requiring 30m of frontage for development in the proposed TSA Zones. Not every development within the TSA1-TSA7 Zones will necessarily be large and there should be room for variability. Furthermore, given the highly irregular lot pattern in these urban areas – eg. Downtown and Rapid Transit Corridors, requiring 30m of frontage may be excessive. There may be lots that have narrow frontage and open-up into a larger development site deeper into the lot.

DUAL MAXIMUM BUILDING HEIGHT REGULATIONS

We appreciate that Staff are providing two options for maximum height – in storeys and metres. We note that “the maximum building height shall be whichever of the two is less”, which creates a problem in our opinion.

More specifically, we believe that the building height in metres is too low to practically achieve the building height in storeys. In general, the heights in metres only allow for 3m of height per storey, beyond the required 4.5m first storey. For example, the TSA4 Zone is proposed to allow for 30 storeys of building height. At 91.5m, with a minimum first storey height of 4.5m, the average floor height would be 3m.

We think this is very tight and unnecessarily limiting. This would limit the opportunity for greater ceiling heights in fitness and community rooms above the first floor, penthouse areas, restaurants top floors, office uses above the first floor and greater ceiling heights in units throughout the building. In addition, any step-back creates a terrace condition, which increases the floor-to-floor height at that level, further diminishing the opportunity to achieve the maximum floor count in the zone.

As an example, standard construction practices would normally call for a floor-to-floor height of 3.2m. With a 4.5m first storey, a parapet height at 0.6m and two step-backs requiring an additional 0.8m as would be required by the proposed zones, the TSA6 Zone could accommodate only 41 storeys at the allowed 136.5m of height. Thus, the height regulation for the TSA6 Zone in metres provides for a full 4 storeys less than the stated allowable height of 45 storeys for the TSA6 Zone. The divergence would be even greater if the penthouse floor is of greater height, or if commercial uses such as offices are accommodated on additional floors in the podium.

We are requesting that the maximum height in metres be re-calibrated to allow for a greater average height that will not unnecessarily limit the intended height of buildings for each zone as expressed in storeys.

We are also concerned about the implications of how storeys of parking will be counted. In many cases, the parking component of buildings are significantly lower in height than a residential storey. Given that the maximum height regulations relate to THE LESSER of height in metres or height in storeys, we are concerned that counting parking storeys may substantially impact the allowable building height.

SUMMARY

We want to again express our appreciation to Council and Staff for their efforts to provide more opportunity for more intense residential development throughout London. We believe that the greater heights proposed for the Official Plan will be very beneficial. We are emphatically requesting, however, that heights of up to 8 storeys be permitted along all Civic Boulevards and Urban Thoroughfares without restrictions to the PTA or a handful of locations where Civic Boulevards and Urban Thoroughfares intersect. We also ask the City to consider allowing up to 15 storeys in Shopping Areas as a whole. In both cases, the Zoning By-law can be used to establish where the maximum height allowed by the Official Plan Place Type is appropriate and where it is not.

We are also appreciative of the City's intention to pre-zone lands within the Protected Major Transit Station Areas. Pre-zoning could make a big difference to reduce the risk of acquiring properties for high rise development and could significantly reduce the time required for planning and development approvals. These can help to reduce the cost of housing and increase housing supply.

We would be happy to meet to discuss these matters further should you desire.

Sincerely,

John M. Fleming, MCIP, RPP

Principal – City Planning Solutions

REDACTED

Examples of 7-8 Storey Residential Buildings Sites located outside of the PTA & not located at the intersection of Civic

Overview

Tricar's request is for the Official Plan to allow the opportunity for up to 8 storeys of height in the Neighbourhood Place Type on "busy streets" – on Civic Boulevards and on Urban Thoroughfares

Staff have proposed a maximum of 6 storeys in the Neighbourhood Place Type along these “busy streets”, with the opportunity for 8 storeys ONLY if a site is: Inside of the PTA or

At the intersection of Civic Boulevards and Urban Thoroughfares

Staff asked that Tricar provide examples of mid-rise apartment buildings over 6 storeys in the Neighbourhood Place Type that are outside the PTA and not located at the intersection of Civic Boulevards or Urban Thoroughfares

The below document shows that there are several such examples existing in London Furthermore, there are some very recent planning approvals allowing for mid-rise apartments over 6 storeys – for example, an affordable housing project of 7 storeys along Hyde Park Road

What’s more important is that there are some very good sites for 7-8 storey development in the Neighbourhood Place Type along these busy streets outside of the PTA

It should be clear that Tricar is not asking for as-of-right approvals on all sites within the Neighbourhood Place Type on busy streets

Rather, Tricar is asking for the opportunity for up to 8 storeys, without restriction to the PTA or the intersection of busy streets

The Zoning By-law would establish where this is appropriate from a planning perspective – considering a multitude of factors such as context, proposed building design, size of site, etc.

Several of the below examples clearly illustrate that 7 or 8 storeys can work very successfully as mid-rise development (defined as such in the London Plan) along these busy corridors

In each case, three views have been shown – plan view, perspective view, and street view.

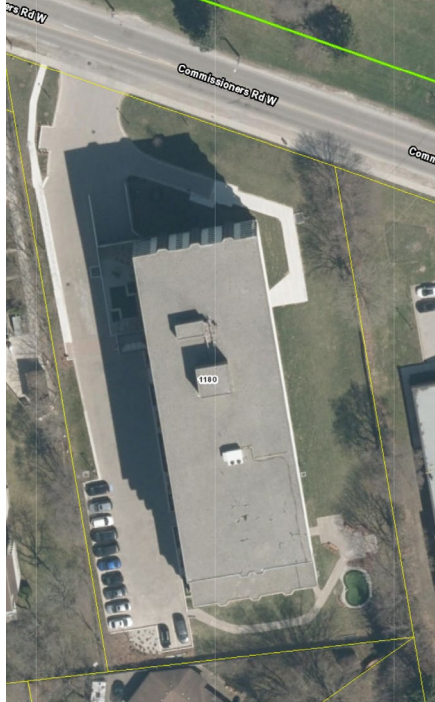
Requested Changes to Proposed Table 11



Neighbourhoods Heights Framework (Table 11)

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	Fronting onto Park
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. 3 Max. 4 in PTA	Same as base	Min. 2 Max. 3 Max. 6 in PTA	Min. 2 Max. 3 Max. 8 in PTA	Min. 2 Max. 3 Max. 8 in PTA	Min. 2 Max. 4
Civic Boulevard and Urban Thoroughfare	Min. 2 Max. 6 Max. 8 in PTA	Same as base	Same as base	Min. 2 Max. 8 Same as base	Min. 2 Max. 8 Same as base	Same as base

1180 Commissioners Road West
 8 Storeys
 Located on Civic Boulevard
 Backs onto Single Detached Housing



1200 Commissioners Road West
7 Storeys
Located on Civic Boulevard
Adjacent to single detached housing





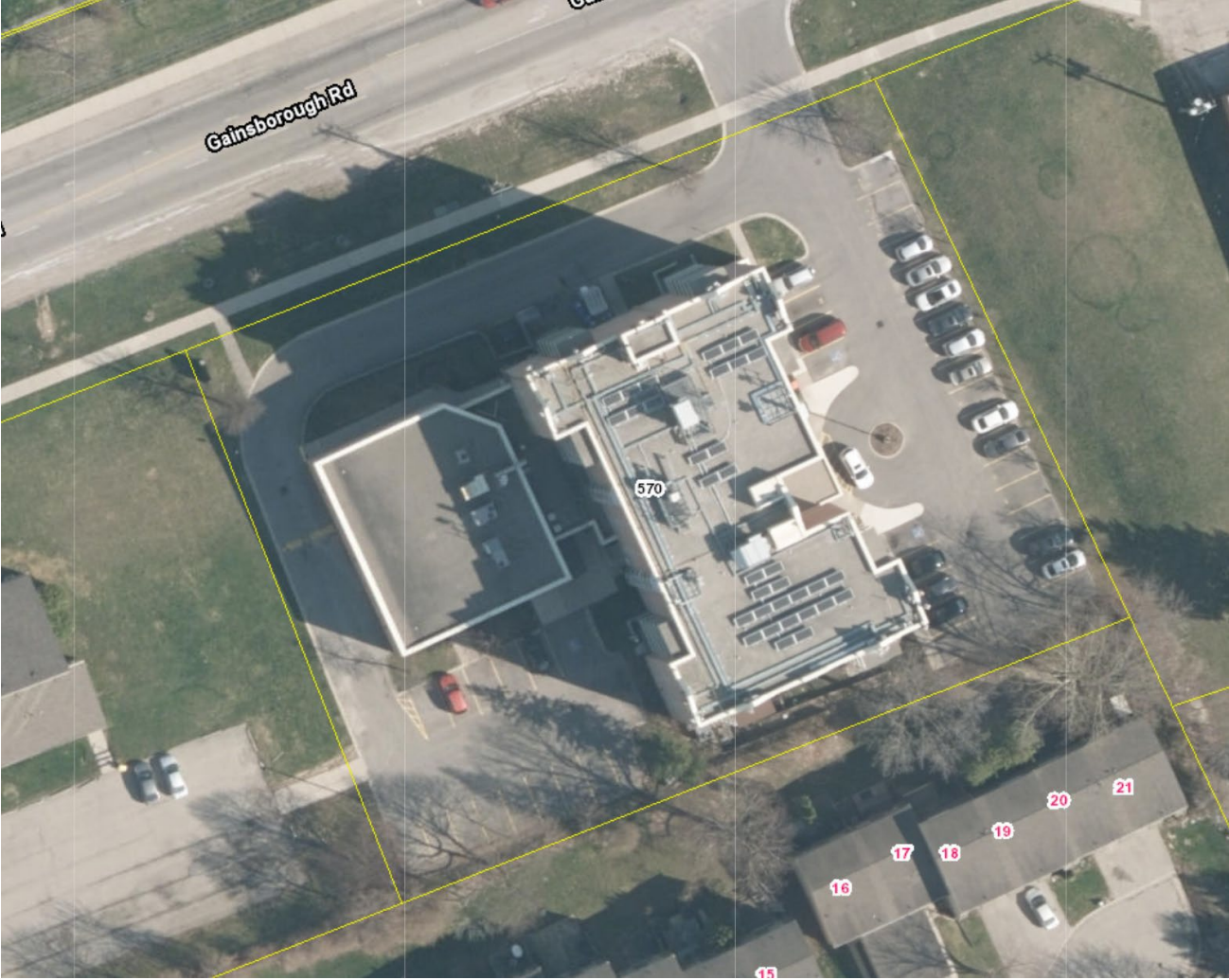
1194 Commisioners Road West
7 Storeys
Located on Civic Boulevard
Adjacent to single detached housing







570 Gainsborough Road
7 Storeys
Located on Civic Boulevard
Adjacent to two storey town homes





1364 Hyde Park Road

7 Storeys

Located on Civic Boulevard

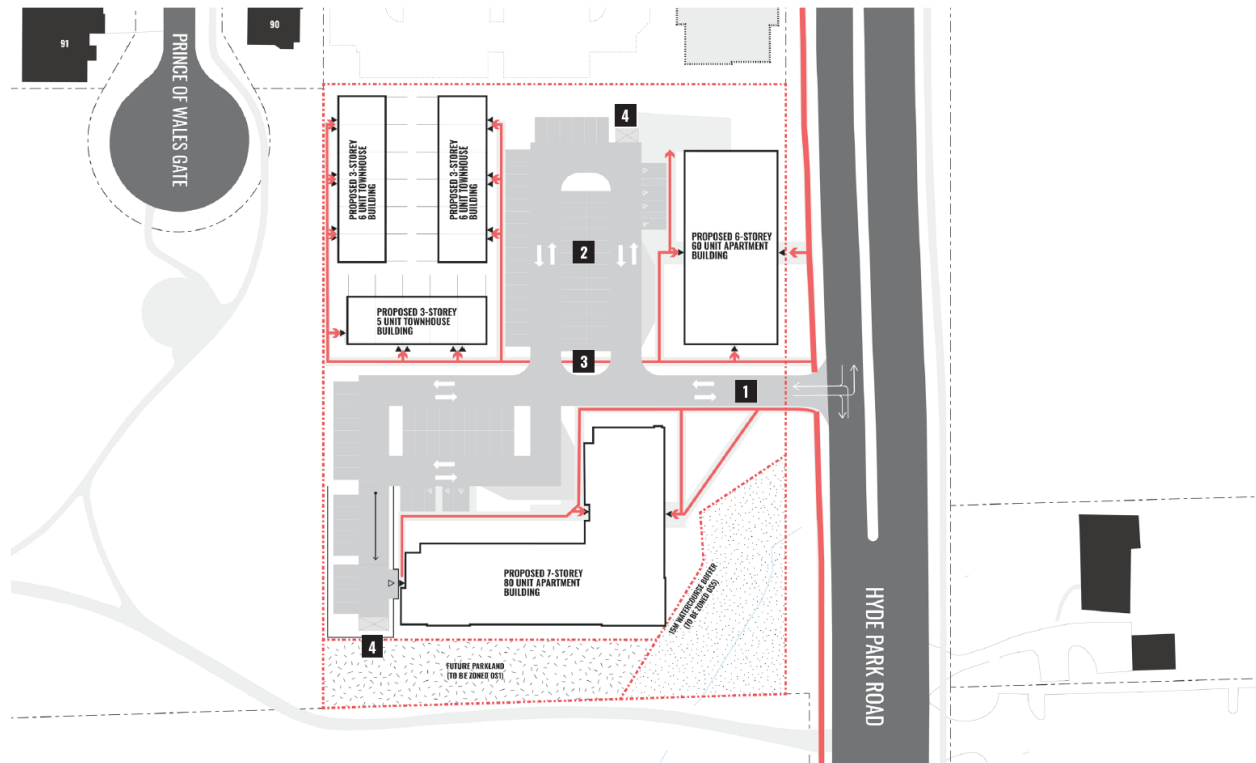
Affordable housing project just recently approved by Council



ist's Rendering of Conceptual Built Form.

NW PERSPECTIVE





- ▲ Principal Entrances
- Site Boundary
- New Building Footprint
- Existing Sidewalk
- Pedestrian Circulation
- Vehicle Circulation/Movements
- 1 New Site Access
- 2 Surface Parking Area(s)
- 3 Pedestrian Linkage (Hyde Park Road to Canterbury Park)
- 4 Waste Collection Area(s)

NOTE: This simplified site access and circulation plan has been prepared based on the detailed site concept plan by Siv-ik Planning & Design. It is meant to aid in illustrating the key attributes and functions of the development concept related to vehicular and pedestrian movements. For dimensions and full site details, please refer to the 2023-06-23 conceptual site plan.

517 Fanshawe Park Road (n/s)
 8 Storeys
 Located on Urban Thoroughfare
 May be considered inside the PTA, but it does represent a good example



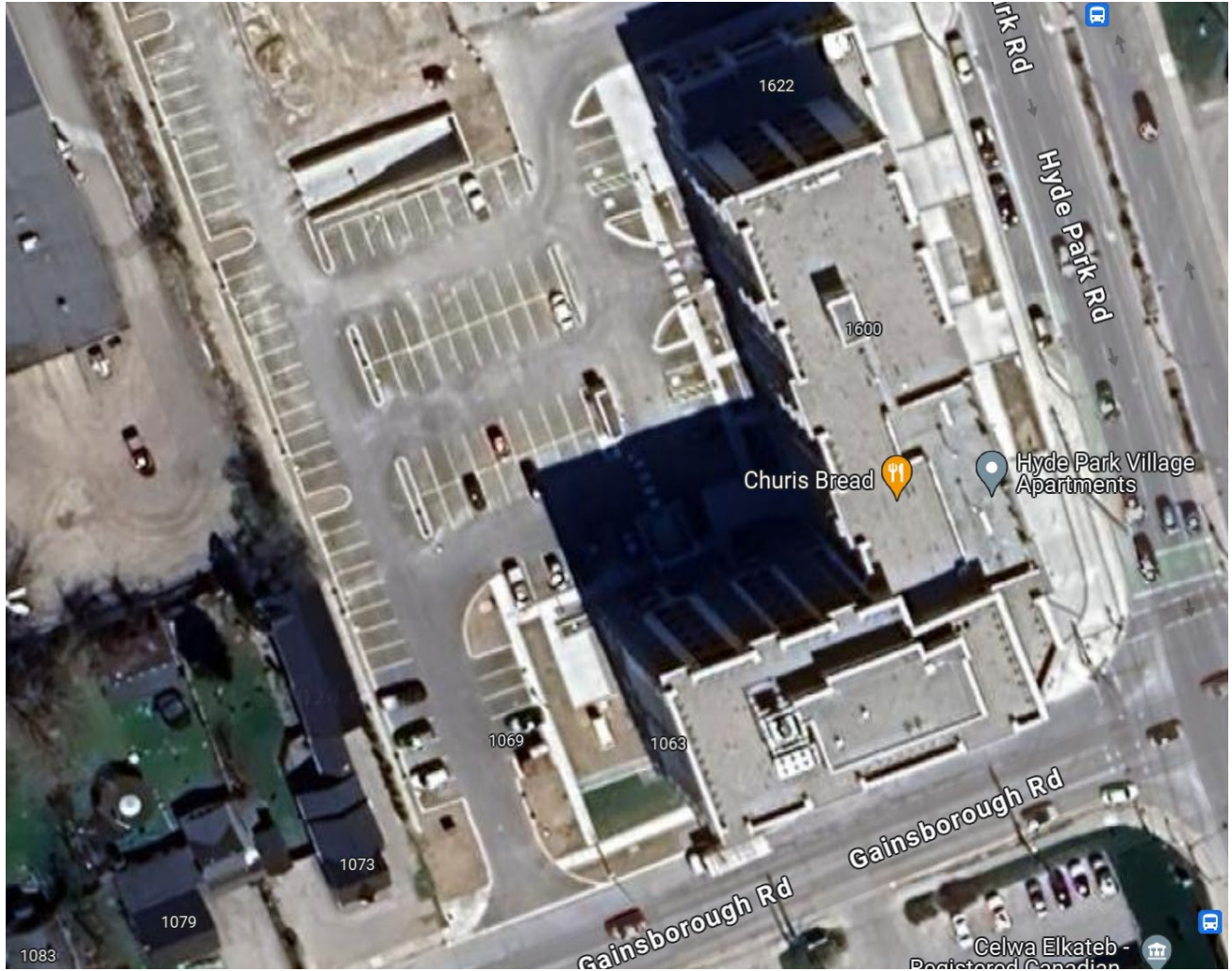


1255 Commissioners Road West
8 Storeys
Located at intersection of a Civic Boulevard and a Main Street






1600 Hyde Park Road
8 Storeys
Located at intersection of a Civic Boulevard and Main Street





1600 Hyde Park Rd
London, Ontario

 Google Street View

Jul 2023 [See more dates](#)



185 and 195 Berkshire Drive

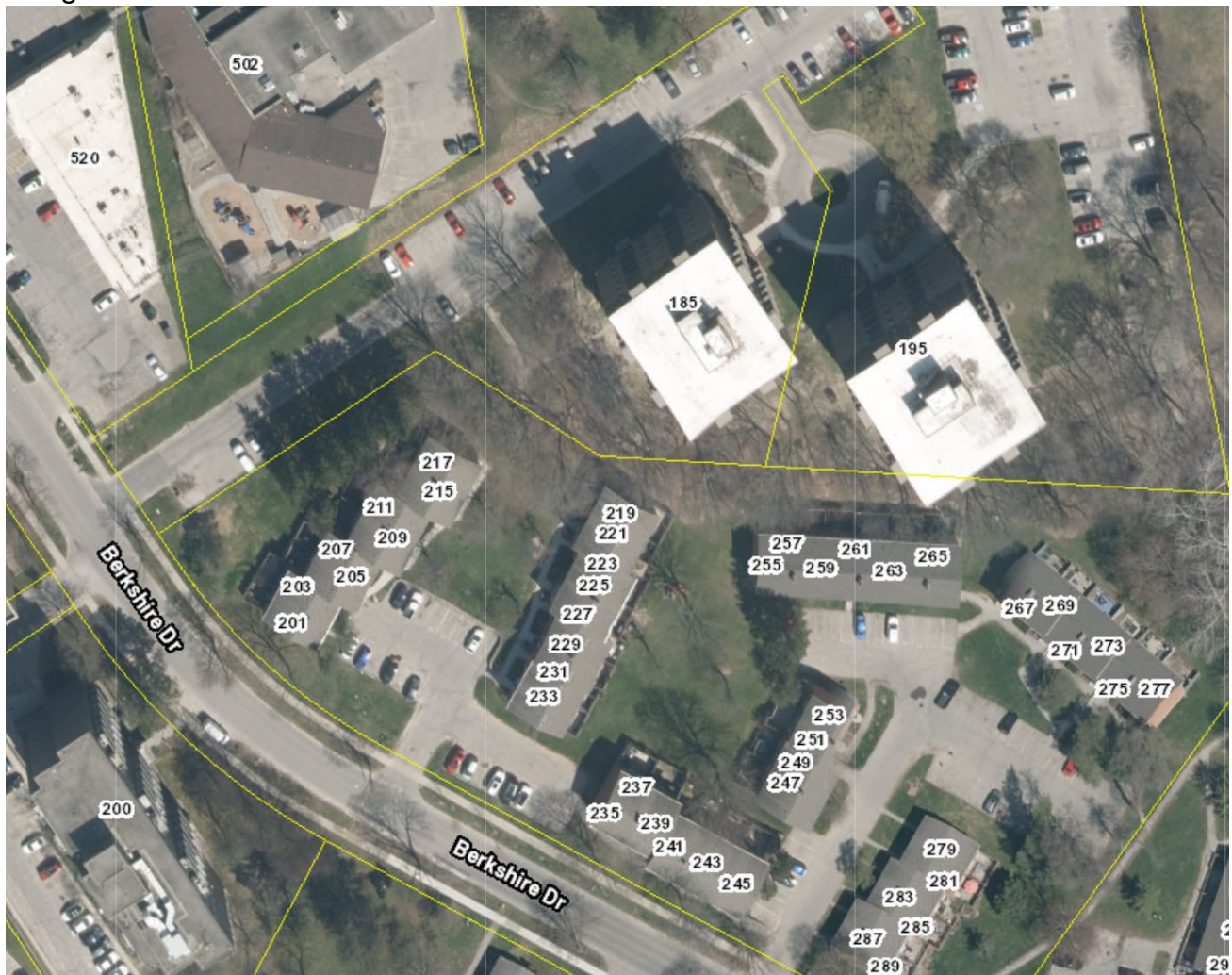
8 Storeys

Not on Civic Boulevard or Urban Throughfare

Inside the PTA

In Berkshire Village

Shows that 8 storeys can be appropriate with low-rise housing, depending on building design and context





Art Blumas

Summary: Need to consider land sensitivities near boundaries and within, the rail. Up to 30 storeys is useful for developers for some parcels.

Wilsan Mansor

Summary: Sought clarification about Oxford-Richmond Transit Village.

AnnaMaria Valastro

Sought clarification. Criticized legislative and executive decision making at the City of London. Said outreach was insufficient.

From follow up email

We respond to your “Notice of Planning Application” (hereafter ‘Notice’) invitation for comments on the proposed re-zoning for Oxford-Richmond to include in your report to the City Council, and thank you for the consultation exercise.

We assert that no reasonable person/committee acting responsibly could make an informed decision on re-zoning the area in question because the consultation has so far been inadequate as regards land use, development intensity, and form of development. We would ask that you answer the following questions before proceeding with any recommendations to the City’s Planning and Environmental Committee and we set out our arguments and questions below.

Land use:

Firstly, with respect to page 2, para 1 of your Notice “a new Transit Village and accompanying policy would focus new higher-intensity development within areas centrally located near rapid-transit and connecting to the Downtown.” We note that ‘Transit Village’ is defined as “major mixed-use destinations with centrally located rapid transit stations.” However, given that no appreciable improvement in transit services in the area exists at this time (more specifically there are no “rapid transit stations”) why does the application refer to these?

Secondly, according to Chapter 5 of the London Plan, the urban type that best characterises the area north of Oxford Street is an Urban Corridor with the potential to be

a rapid transit corridor which is dependent on transport improvements. We therefore fail to understand why you are proposing this corridor to be re-zoned as a ‘transit village’ and

would ask you to provide your rationale for such a designation.

Thirdly, on your map, there is a protrusion into North of Oxford, which includes the Bishop

Hellmuth Heritage District. There is also a small section (with one dwelling) on St George

Street which is not included. Please can you explain how you came to decide on the area marked in red on your Map i.e. how was it selected and on what basis? Why are you recommending an incursion of very high-density new buildings into a designated heritage area?

Fourthly, while we congratulate the City of London for being awarded a fund to encourage housing supply growth, what proposals are there with respect to appropriate development for the area?

Development intensity:

Please can you provide the rationale for selecting the parcel of land for re-zoning for new

'higher-intensity' development, given that:

a. the space highlighted on the map for Oxford-Richmond already includes a mix of high rise (on Oxford Street), multiple dwelling housing, mixed with open spaces with trees, retail including pharmacies, coffee shops, a grocery store etc., and medical and health care services in what is a designated heritage area.

b. according to the Bishop Hellmuth Heritage District, Ontario Population & Demographics the Bishop Hellmuth district, is more densely populated than London as a whole. Your proposals will take population density to unacceptable levels.

Form of development : The application states that buildings will be built within a range of heights from 2 to 15 and 20 stories. However, we learn that a report, The London Plan

Heights Review, is to be presented to the Planning and Environmental Committee (PEC)

dealing with 2.3 (PEC Agenda July 16), "to consider revised maximum building heights in

all urban Place Types areas" which specifies amongst other things, an increase from 20 to 30-plus storey height limits. Further, we were very surprised to read in table 3, a recommendation for 'Transit Village' height to be raised to a maximum height of 30 storeys. You will understand that although your application notice includes a "**NOTE: The

Heights framework within the London Plan is currently under review" such a representation to a committee to raise building heights considerably the day after consultation on your application closes, appears disingenuous given that your re-zoning application notice states 20 storeys. In fact, even high-rise dwellings of 7-20 stories will significantly impact our area. This conduct does not inspire confidence in the fairness of the consultation exercise in which you have embarked since the information you have provided in the consultation document, in the light of item 2.3, is misleading.

Other Matters:

1. Accessibility of communication. We note that tenants in the area and some business owners who lease their properties have not been consulted in this exercise, nor have the residents in some of the streets in the immediate vicinity in particular, the Bishop Hellmuth neighbourhood which reaches Oxford Street. They have no knowledge of your plans which will impact on them significantly. To our knowledge, there have been no public notices placed in prominent locations in our neighbourhood nor has notice been given in the Londoner newspaper (e.g. July 4 2024 and July 11 2024).

This points to the inadequacy of the consultation process. Furthermore, the application details are written in a way that is confusing to many people; it is not written in plain English, and it does not explain the terms used adequately or with clarity such that a reasonable person could understand the implications of the re-zoning.

Page 3 paragraph 6 states that “Alternative accessible formats or communication supports are available upon request. Please contact landerv@london.ca for more information.” Someone with a disability (e.g. sight impairment or intellectual disability) or older person not using online communication will have been seriously disadvantaged in accessing such ‘accessible formats’ and we therefore believe this notice contravenes The Accessible Canada Act of 2019.

2. Timescale for consultation: The Notice of Planning Application was sent out on June 13. This has left just over one month for any consultation to occur over the re-zoning at a time when many people are on vacation. We argue for all the reasons/concerns above, this is not enough time for any Planning and Development department to provide reasonable or practicable time or adequate consultation to residents and retailers of the area.

Therefore, we do not believe that your recommendations to the City Council have been adequately informed since sufficient time for genuine consultation has not been given to allow a reasonable person to provide adequate comments on what a change in land use would mean and we ask that you halt your recommendation to the City Council in order to appropriately extend the consultation process in line with statutory requirements to include all those likely to be affected by your proposed re-zoning and to give you time to answer our questions.

August 26, 2024

Reasons staff provided for choosing Richmond and Oxford were superficial, other than they envisioned this area as a 'gateway' to the downtown and supporting area businesses. It is clear that this rationale ignores the community and fails to explain how a 'wall' of high density highrises can be defined as a gateway.

Staff are proposing this area without broad consultation or research. Staff only stated that they envisioned this area as a 'gateway'.

The Transit Village Policy stipulates that transit stations WILL be centrally located within a transit village, yet staff stated at a virtual meeting on July 31 that NO transit station will be located on the corner of Richmond and Oxford. Staff are not in a position to override policy.

The north end of North Talbot is rich in industrial heritage and the area is surrounded by heritage districts yet no heritage studies were done. I have sent separately a file describing the history of the area. Staff failed to address these concerns when asked why a heritage study of the area was not done. It turns out, no studies was done of any kind and/or presented to the community.

It is in every way - bad planning.

Wharncliffe and Oxford

This is a better location because the roads are wider with the recently widening of Western Road. It connects to move transit routes i.e. University, Oxford, Riverside, Wharncliffe, Downtown and London East. Richmond routes overlap splintering at the university 1) Masonville Mall 2) University. There is wider range of transit routes, and greater student density at Western Rd down into the downtown.

The streets are too narrow to accommodate increased traffic at Oxford and Richmond. The north end of North Talbot is also heavy in industrial heritage. Please see second email.

A wall of highrises is an old idea because for the obvious reasons that it creates a wall of buildings dividing communities. For residents north of Oxford it potentially removes all their sunlight until late in the afternoon. None is healthy for people.

Also, high density highrises are dangerous today because they are not built the same way as older buildings which incorporated stone and bedrock. It is unclear to me how longer these buildings will last and I don't think we should be investing in infrastructure for something that may not last more than 60 years. One cannot build a city in a climate where the winters are all about freezing and thawing - the one climate condition that is cracking concrete and causing major building shifting.

Horton and Wellington

The City of London is ALREADY widening Wellington Street at great expensive for bus rapid transit. Horton street was built as a through street to redirect through traffic and is currently under utilized. While transit connections are limited here now, there is potential to increase connections east and west. The infrastructure is there in wider roads and being built to support a higher density. There is space where there is no space at

Richmond and Oxford. And the business in east London could use the boost if using your logic helps.

However, if neighbourhood businesses do not support the community, the community will not support them. This is true of Richmond Row. many permanent residents do not visit Richmond Row because the businesses are just fast food for the most part. There is no hardware store, no drugstore, there are some nice restaurants that people may frequent but they are expensive. There is one clothing store and two vintage clothing stores but for the most part, area residents do not shop in the neighbourhood. And that is why there is a high turnover of businesses.. They are not sustained by the neighbourhood as students are only there for 1/2 year.

Finally, staff have not responded to a request for a broader community meeting for the proposed Richmond and Oxford Transit Village.

Attached is a presentation of the Kent Brewery [**Update on Requested Study by Lach Stewardship for Potential Designation:197, 183, 179 Ann Street, 84, 86 St George Street**] but beginning on page 37, is a description of other area 19th century buildings that are currently repurposed. Some are captured in your Transit Village mapped area. This is what I mean about the lack of research. You are not familiar with the area. You just assumed an industrial area in the core should be transformed. We are well aware, that once the zoning changes, demolition begins.

And I would like to better understand what sort of requests have you received by commercial property owners such as the owner of the Beer Store property to push for rezoning? I would appreciate an answer. Please include this presentation with my previous comments.

Lee Greenwood

Summary: Why is 731 Wellington Street excluded from the proposed Transit Village?

Daniel Hertzman

Hi, I believe this is how I can give feedback on the planning application notice I received to my house (**REDACTED**) for the transit village amendment for oxford-richmond area. I am in favour of the amendment especially getting rid of the parking minimums.

Sean M Menard

Hi there, what's the business case around adding Richmond and Oxford as a transit village? What does the proposed densification look like and how will it affect current residents? What about increased traffic to the area, what is your plan to tackle this?

Edward Etheridge

I am wondering what zoning and bylaws may change, that will affect me?

Is there anything proposed that could attempt to force me out of the property, for higher density buildings?

I would think that the new bylaws would have to respect heritage precedents, right?

Glenn Hickling

Yes can you distill this down or provide clear information as to what this means to us . . . We live at **REDACTED**. thank you .

Paul. R. King

I received the Notice of Planning Application dated June 13, 2024 regarding Transit Village Amendments for the Oxford-Richmond area and 100 Kellogg Lane. The Notice does not specify which file is which, but I am assuming that File OZ-9726 is for the Oxford-Richmond Transit Village.

I am requesting that you notify me of the decision of the City of London regarding the proposed Official Plan Amendment and the Zoning By-law Amendment relating to the Oxford-Richmond Transit Village (File: OZ-9726). I thank you for so doing.

In addition, the Notice of Planning Application states: The draft amendment is available online via the planning application webpage at: london.ca/planapps. The draft amendment does not appear to be available at this webpage. Could you please let me know where the draft amendment is available for review.

Lastly, on September 13, 2023, Prime Minister Trudeau announced the federal government reached an agreement with the City of London regarding \$74 million in funding under the Housing Accelerator Fund (HAF) initiative. Could you please let me know where this agreement is available for review.

It is not possible to comment on the proposed amendments by July 15, 2024 when critical information does not seem to be available. I appreciate your assistance.

Why was the Notice of Planning Application sent out with a comment date by Monday July 15, 2024, when the Planning and Environmental Committee has a meeting scheduled for Tuesday July 16, 2024 with much denser and more detailed proposals? The current Notice of Planning Application is not only premature but also misleading. The one-line note on page 2 of the Notice, indicating that the height framework is "*currently under review*" with no details, is hardly sufficient. Until the current review of the Heights framework is completed, isn't it the case that any people or organizations spending any time reviewing the vague implications of the Planning Application or submitting any detailed comments are wasting their time?

Marilyn & Doug Fenton

We are presently reviewing this by law amendment and have the following question about Ann St specifically. We note that only the north side of Ann St is addressed in this change. What is the present zoning for the south side of Ann St? Why would the south side not be included in this proposal?

Fader Design Build c/o Nick Dyjach, Strik, Baldinelli, Moniz Ltd.

Please review the attached letter requesting **[801-807 Talbot Street and 12-13 Oxford Street East]** to be included within the proposed applications to amend The London Plan to create new Transit Village. Per the letter, we believe the transit village designation could be expanded to include lands that are appropriately intensified in this area.

On behalf of Fader Design Build, SBM Ltd would like to request your consideration of **REDACTED** 801-807 Talbot Street and 12-13 Oxford Street East to be included within the above-mentioned City initiated applications (OZ-9726 & OZ-9727).

The site consists of six (6) single detached lots that have been assembled for the purpose of a forthcoming intensification project to construct a mid- to high-rise building. The site is located in the North London Planning District at the northwest corner of the Oxford Street East and Talbot Street intersection. In total, the six lots comprising the site are 0.24 ha (0.6 ac) in area and approximately 375m west of the Richmond Street intersection. The site provides a location that is highly visible, accessible from Talbot Street, steps away from the Thames Valley Parkway, and suitable for redevelopment. Presently, the site consists of six single-detached buildings that are all being used as rental properties with six separate driveways accessed from both Oxford Street East and Talbot Street. The four lots fronting onto Talbot Street (#801, #803, #805, and #807) were "Listed" on the City's Register of Cultural Heritage Resources in 2017. The buildings were constructed circa 1910-1920 in the Craftsman, Four Square and Edwardian styles.

Presently, the proposed application would re-designate all lots south of Oxford Street East directly across from the site that have a variety of development constraints, such as heritage buildings designated under Part IV of the Heritage Act, as well as land in proximity to the active railway corridor. The subject site would not be as constrained as some of the lands proposed to be included within the Transit Village Place Type and would present a reasonable infill opportunity at a great location. The London Plan currently designates the site as Neighbourhoods Place Type with frontage onto Oxford Street East. Per Table 11 of The London Plan, the upper maximum building height is 6 storeys. The subject site has already been assembled to create a worthwhile intensification project. The intent of this request is to include the site within the new Transit Village Place Type allowing greater flexibility in permitted uses and intensity in built form. The potential increases further, if the abutting lands were also included within

the place type and potentially further expand land assembly and redevelopment opportunities.

We are requesting that the site's designation be changed through the OZ-9726 & OZ-9727 review process so that it improves the range of uses and allows for increased intensity in the near future. The proposed land use designation change would allow the site to take advantage of existing servicing infrastructure, supports the future rapid transit services, and offers the opportunity for a substantial supply of new housing on this major arterial in London. Furthermore, re-designating these lands further maximizes their development potential and provides new opportunities for improved design and mix of uses.

We look forward to participating in the upcoming public meeting and would appreciate the opportunity to work with Planning staff and provide additional planning analysis, if required. Should you require any additional information, please do not hesitate to contact the undersigned.

Craille Scott-Barré

As a resident of Bishop Hellmuth Conservation District and residing on **REDACTED**, I am most concerned about this Transit Village Proposal at Oxford / Richmond. While I understand the desire to improve transportation in the City of London, this particular area which borders three Historic Conservation districts and is considered to be a VERY desirable place to live, may not be the best choice. Perhaps the nightmare that is Wharncliff /Oxford is worth looking at.

The main concerns here are ; the proposed height discrepancies between towers and existing residential and the possible decrease in property values in the adjacent residences. Given that we have just experienced a rather sizeable increase in property taxes especially in this area I think that the City Taxation Office may be inundated with residents of Old North wanting a review and a reduction.

It would be prudent to have a public meeting to properly explain the full implications of a Proposal that could affect the integrity of this beautiful Historic area .

Lastly, can we appeal to the City to at least landscape this Transit Village as a suitable entrance to the historic area .

Deb MacLeod

Regarding the Transit Village Amendments that are outlined:

The proposed amendment (which I understand is a done deal regardless of any input according to the word on the street?) directly impacts several surrounding heritage communities with the greatest concern being the height framework "currently under review" of up to 20 storeys. The framework review should consider all factors that will protect the surrounding established heritage homes and neighbourhoods from noise pollution, construction vibrations, construction parking , air flow, light pollution, shadows and lack of light.

-Also sewer infrastructure is it currently designed to accommodate higher density 20 storeys in the older heritage areas as outlined?

-Heritage conservation and design elements - is this factored into the amendment proposal?

Can the height framework be decided on an individual basis rather than making the entire zoned potentially amended area under the same height restriction in order to provide protection to property owners?

If the purpose of the Amendment is to pursue a rapid transit corridor with higher density buildings allowed perhaps if the buildings allowed under any new zoning amendments are restricted with a limited parking allowability meaning that there should not be parking available to every unit built as the proposed plan is to make it easy to use transit it seems then that any future buildings in the outlined area should also be limited to accommodating vehicles in that only a limited number of parking units should be allowed per building percentage. Limiting how many units of parking per building would in turn keep the traffic in the surrounding areas limited, keep pollution and noise lesser and would seem appropriate to the purpose of the rapid transit. As well the limited parking has successfully worked in other larger cities where not every dwelling is equipped with a parking space.

Will there be consideration of more green space or more care taken to the current surrounding green spaces to accommodate outdoor health and well being for added density to the areas.

Noella Cliche

My concern is that any development so close to the space highlighted on the map for the Oxford-Richmond-Sydenham area, much of which is a designated heritage area, would take away from the distinct heritage character of this area and abutting neighborhoods. To approve this development would compromise this area's unique character and would most likely have a negative impact on its residents. It only takes one incompatible development to detract from this area's unique character.

On another note, I am distressed with the little timeline you have provided for consultation. The months of July and August are prime "vacation" times for the majority of the public so having a July 15th date to receive any comments on your notice is quite unreasonable and impracticable for many members of the public. If your timeline was set up to eliminate any genuine consultation - then you have succeeded! It is difficult to make an informed decision on your proposal for rezoning when the public has not been

provided with the means for adequate consultative feedback. The lack of transparency is appalling and unjustified for a community with such historic roots.

You mention that "The Heights framework within the London Plan is currently under review". Surely we should have clarity on this before you make a recommendation to the City's Planning and Environmental Committee. Is this not on the agenda of July 16?

I don't understand why this particular parcel of land has been chosen for "higher-intensity" development and would suggest that public consultation meetings be held so that you could provide the rationale for this.

Dr. Rachel V E Forrester-Jones

Also provided: Susan Agranove, Dr. Robin Baker, Noella Cliché, Carol Anne Wong, N. Colin Baird, Dr. Peter Fendrich, Tilottama Rajan, Craig Brown, Kathleen Brown, Mary Parks, Helen Rowland, Katharine Breda, Marlyn Loft, Dr. Anita Kothari, Dr. Robert Stainton, Ann Vandenbosch, Desi Brownstone, Ruth Reid, Kandice McKee, Diane Violette, Dr. Sandra Fisman, Dr. Michael Fisman, Nikki Adam, Najet Hassan, Garry Montgomery, and Fred Munn

We respond to your "Notice of Planning Application" (hereafter 'Notice') invitation for comments on the proposed re-zoning for Oxford-Richmond to include in your report to the City Council, and thank you for the consultation exercise.

We assert that no reasonable person/committee acting responsibly could make an informed decision on re-zoning the area in question because the consultation has so far been inadequate as regards land use, development intensity, and form of development. We would ask that you answer the following questions before proceeding with any recommendations to the City's Planning and Environmental Committee and we set out our arguments and questions below.

Land use:

Firstly, with respect to page 2, para 1 of your Notice "a new Transit Village and accompanying policy would focus new higher-intensity development within areas centrally located near rapid-transit and connecting to the Downtown." We note that 'Transit Village' is defined as "major mixed-use destinations with centrally located rapid transit stations." However, given that no appreciable improvement in transit services in the area exists at this time (more specifically there are no "rapid transit stations") why does the application refer to these?

Secondly, we fail to understand why you are proposing this corridor to be re-zoned as a 'transit village' and would ask you to provide your rationale for such a designation.

Thirdly, on your map, there is a protrusion into North of Oxford, which includes the Bishop Hellmuth Heritage District. There is also a small section (with one dwelling) on St George Street which is not included. Please can you explain how you came to decide on the area marked in red on your Map i.e. how was it selected and on what basis? Why are you recommending an incursion of very high-density new buildings into a designated heritage area?

Fourthly, while we congratulate the City of London for being awarded a fund to encourage housing supply growth, what proposals are there with respect to appropriate development for the area?

Development intensity:

Please can you provide the rationale for selecting the parcel of land for re-zoning for new 'higher-intensity' development, given that:

- a. the space highlighted on the map for Oxford-Richmond already includes a mix of high rise (on Oxford Street), multiple dwelling housing, mixed with open spaces with trees, retail including pharmacies, coffee shops, a grocery store etc., and medical and health care services in what is a designated heritage area.
- b. according to the Bishop Hellmuth Heritage District, Ontario Population & Demographics the Bishop Hellmuth district, is more densely populated than London as a whole. Your proposals will take population density to unacceptable levels.

Form of development : The application states that buildings will be built within a range of heights from 2 to 15 and 20 stories. However, we learn that a report, The London Plan Heights Review, is to be presented to the Planning and Environmental Committee (PEC) dealing with 2.3 (PEC Agenda July 16), "to consider revised maximum building heights in all urban Place Types areas" which specifies amongst other things, an increase from 20 to 30-plus storey height limits. Further, we were very surprised to read in table 3, a recommendation for 'Transit Village' height to be raised to a maximum height of 30 storeys. You will understand that although your application notice includes a "*NOTE: The Heights framework within the London Plan is currently under review" such a representation to a committee to raise building heights considerably the day after consultation on your application closes, appears disingenuous given that your re-zoning application notice states 20 storeys. In fact, even high-rise dwellings of 7-20 stories will significantly impact our area. This conduct does not inspire confidence in the fairness of the consultation exercise in which you have embarked since the information you have provided in the consultation document, in the light of item 2.3, is misleading.

Other Matters:

1. Accessibility of communication. We note that tenants in the area and some business owners who lease their properties have not been consulted in this exercise, nor have the residents in some of the streets in the immediate vicinity in particular, the Bishop Hellmuth neighbourhood which reaches Oxford Street. They have no knowledge of your plans which will impact on them significantly. To our knowledge, there have been no public notices placed in prominent locations in our neighbourhood nor has notice been given in the Londoner newspaper (e.g. July 4 2024 and July 11 2024). This points to the inadequacy of the consultation process. Furthermore, the application details are written in a way that is confusing to many people; it is not written in plain English, and it does not explain the terms used adequately or with clarity such that a reasonable person could understand the implications of the re-zoning. Page 3 paragraph 6 states that "Alternative accessible formats or communication supports are available upon request. Please contact landerv@london.ca for more information." Someone with a disability (e.g. sight impairment or intellectual disability) or older person not using online communication will have been seriously disadvantaged in accessing such 'accessible formats' and we therefore believe this notice contravenes The Accessible Canada Act of 2019.

2. Timescale for consultation: The Notice of Planning Application was sent out on June 13. This has left just over one month for any consultation to occur over the re-zoning at a time when many people are on vacation. We argue for all the reasons/concerns above, this is not enough time for any Planning and Development department to provide reasonable or practicable time or adequate consultation to residents and retailers of the area.

Therefore, we do not believe that your recommendations to the City Council have been adequately informed since sufficient time for genuine consultation has not been given to allow a reasonable person to provide adequate comments on what a change in land use would mean and we ask that you halt your recommendation to the City Council in order to appropriately extend the consultation process in line with statutory requirements to include all those likely to be affected by your proposed re-zoning and to give you time to answer our questions.

Jackie Farquhar

I am responding to the recent notification, via the grapevine, about the Transit Village at Oxford and Richmond. This project is only somewhat understandable since I do not believe the City has as yet a concrete plan in place for rapid transit north on Richmond Street. I gather that the rationale of this "early designation" for a Transit Village with boundaries in place, is to attract developers and will facilitate financial aid to the City (HAF) from the Federal/Provincial governments toward the goal of intensification for needed housing in the City centre.

When considering the boundaries of the Transit Village, **I would plead/urge Planners and Council** to give serious consideration to the northern boundary being the **SOUTH SIDE OF OXFORD STREET** since the north side of Oxford is the entrance into Old North with historic residential homes (e.g. Bishop Hellmuth HCD). Such a change in boundaries would minimize height discrepancies between high rise buildings in the village and existing residential streets.

Once the boundaries of the Transit Village are hopefully amended and then ratified, I would urge the City to carefully plan features that do in fact give a "village" atmosphere including well designed buildings that include street level cafes and shops and streets that are pedestrian friendly. . Also careful planning for landscaping/walking/bike paths/ community gathering places and plenty of green spaces .

I am keen to be notified when the mandatory **Public Participation Meeting** will be held for this project and ask that I receive other related notifications. .

Further to my letter/email response re: the Transit Village Planning Application dated July 14th, 2024 I would ask you to please consider making a concession to the July 15 deadline for responses and add my additional request as follows.

I now understand that a Heritage Impact Assessment (HIA) should be undertaken as a part of an application for an Official Plan amendment and/or a Zoning By-law amendment which a successful Transit Village Application would achieve.

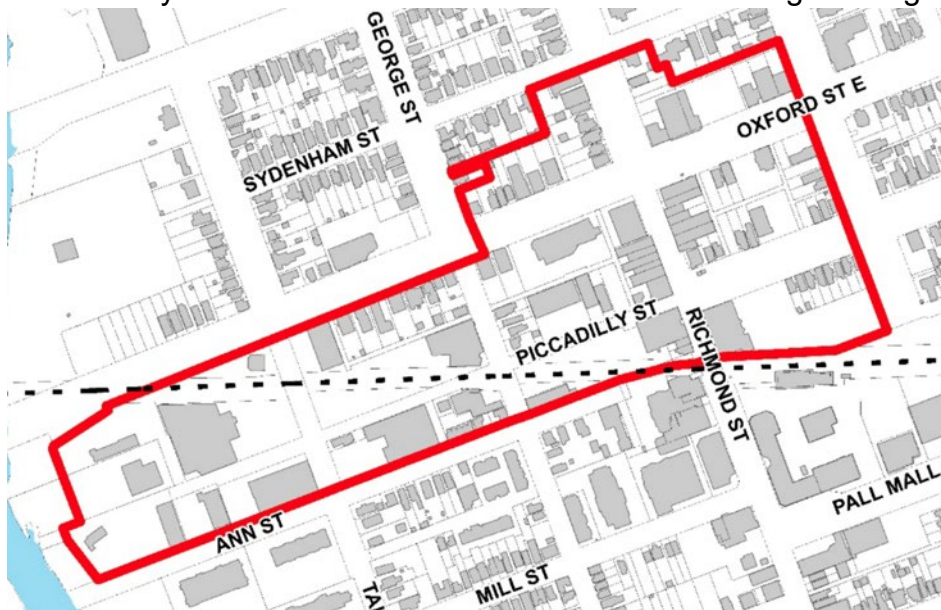
Given that the Bishop Hellmuth Conservation District is adjacent to the proposed Transit Village, I am asking that a heritage impact assessment be undertaken and included in the Planning Staff's Report on September 10th 2024 to The Planning and Environment Committee. (see London Plan quote below).

London Plan Section 565 - a Heritage impact assessment will be required for new development, redevelopment, and civic works and projects on, and adjacent to, heritage designated properties and properties listed on the Register to assess potential impacts and explore alternative development approaches and mitigation measures to address any impact to the cultural heritage resource and its heritage attributes."

Your consideration of my request would be very much appreciated

Brendon Samuels

I am unsure from reading this notice how this map boundary was drawn and justified. Besides the notice, I have been unable to find any information online about this proposal – has there been a public meeting or presentation? Consultation with neighbourhood associations? It is unclear what the amendment to create a new "Transit Village" will entail for the area materially. Are there plans to improve transit here, in addition to allowing for rapid scaling of density? This will be important for determining how density will be accommodated without exacerbating existing traffic conditions.



I am particularly concerned about the section of the boundary extending north of Oxford up to Sydenham on either side of Richmond. Taken with the information provided in the London Plan Heights Review being presented at PEC on July 16, 2024, Table 3 of that report suggests that the height of buildings in Transit Villages will be allowed up to 30 storeys, an increase from the current standard of 15 storeys. I am concerned that this is going to result in extreme intensification along Richmond north of Oxford with no transition between developments of high rises and the existing buildings, which are mostly 1-3 storey, low-density low-rise buildings. It will dramatically and permanently alter this gateway into the downtown.

While I appreciate the need to build more units in the core, and I support intensification and infilling generally, I would recommend this should focus on the section shown south of Oxford St, especially in industrial parcels that are underutilized, and exclude the section extending north to Sydenham. I would urge the City to live up to the name of the "Transit Village" Place Type by explaining to the local community how exactly transit in this area will be improved to keep up with the added density, through the Mobility Master Plan and otherwise.

Devin Hanes

I am writing to you to express my concern and opposition re: the zoning by-law amendment of the area of Richmond St. and Oxford St. E.

My family and I live at **REDACTED**

I grew up in this neighbourhood **REDACTED**.

Other than a few years in Ottawa going to University, I have always lived in this neighbourhood, having rented on Colborne St. and Oxford St., and owned on Piccadilly St. We choose to live in this neighbourhood for multiple reasons: including mature trees, green space, old homes with character, friendly neighbours, ease of access to the Thames Valley Parkway, schools that our children can walk to instead of taking the bus, and the ability to walk to shopping (I drove a truck while going to University, enough driving for a lifetime....)

Here are some of our concerns:

We found out about this planning application by word of mouth through the community – not from a formal notification from the city.

While we appreciate the City of London's recognition that building up is a more efficient and ecologically responsible way of adding housing to our city than building out; I am very critical of doing it in this location at this time. The city does not have the necessary infrastructure to support the increasing housing density proposed.

As anyone who have ever been at this intersection between 4pm and 6pm knows, the traffic can intense, thick, and a standstill. Oxford St. is often backed up from Wharncliffe Rd. to east of Adelaide St. Many workers from Fanshawe College, General Dynamics, and other east London workplaces drive home west along Oxford St. to Oakridge, Byron, Riverbend, Kilworth, etc. Oxford St. is already OVER capacity for traffic.

The addition of high-density housing in this area will exasperate this already over-crowded road.

Our public school system is unable to handle increase student population in this area. Both St. George's Public School and Central Secondary School are over capacity. St. George's school boundary was just re-drawn to decrease its catchment area to try to help alleviate this issue. Should new high-density housing be built, there were not be space at the local schools for the students to attend, meaning they will be bussed to other schools, making traffic even worse.

Rain-water management and flooding. The Piccadilly, Bishop-Hellmuth, and St. George/Grosvenor neighbourhoods all have numerous underground streams and water

table issues. Look at maps of the area from 100 years ago and you will see numerous small streams and creeks emptying in the Thames River. As a child, we often played and built forts in the old creek on what is now Piccadilly Park. All residents of the area are well aware of the flooding in spring, and during heavy rainfalls – up through the centre of our basement floors (not seeping in though the walls), gutters unable to keep up with the water, etc. Should high-density, high-rise buildings be built, there will be more concrete and pavement meaning more water runoff to the storm sewers; and less yard space, greenspace, soil, etc. meaning less natural moisture absorption.

Transit village. It is my understanding that the purpose of a "transit village" is to build high-density housing on a transit line; that is near rapid transit, connecting to downtown. London does not have any "Rapid Transit." While there are bus routes running along both Oxford and Richmond streets, they are definitely not "rapid." Especially during rush-hour, and especially anytime a CP Train is crossing Richmond St. Building high-density housing here will mean more cars here.

Better locations. Because Oxford and Richmond area does not have the infrastructure required to support such an endeavor, it would better serve the city and its residents to develop and build Transit Villages in newly developed parts of the city, where the required infrastructure already exists, or can be built to meet the requirements of such an endeavor.

Although we live outside the proposed by-law amendment, it does negatively impact my family's daily life. From grocery shopping, to going to work; my children going to school, my children going to work; after school sports / extra-curricular activities; etc. The increased strain on our local community's infrastructure and resources will negatively impact our neighbourhood's quality of life.

I ask Who is applying for the amendment and for What purpose. I know the applicant is The City of London, but "Who" is really applying for it? and How come? Who benefits from this amendment? And who loses? Who will make money from this? The local residents will lose.

I urge the city to deny this amendment.

Should any further discussions and/or applications arise, I ask that city do a better job of informing ALL local residents effected by plans.

Trevor Holness

I wish to make the following comments on the requested amendment to the official plan and zoning by-law, for the Oxford-Richmond area.

Firstly, it is obvious to me that the proposed amendment is designed to please the political masters in Toronto and Ottawa, rather than the needs of the community. For example development of the north side of Oxford at the intersection, will deprive the local residents of necessary services, such as banking and food retailing.

According to Airvibes (www.airvibes.com), the population density of the affected areas, namely Saint George-Grosvenor and Bishop Hellmuth Heritage districts, have population densities of 2,351/sq.km. and 2,676/sq. km., respectively; whereas the population density of the City of London is a mere 984/sq. km, indicating that the areas are already experiencing a high level of density and thus offer less opportunity for increasing density than other areas of the city.

Reference to Transit Villages having centrally located rapid transit stations, ignores the reality of the rejection by previous Council, of the BRT in the north and west of the city. To present amendments that provides the opportunity to reopen this divisive issue, should be rejected.

A more palatable drawing of the boundaries would be to have Oxford Street, as the northern boundary, or maybe, the rear lot line of the properties on the north side of Oxford Street between St. George and Wellington Streets, although this could lead to the lose of neighborhood facilities, as mentioned above.

I hope that my comments will lead you to scrap this amendment and develop a plan that benefits the residents of the Oxford-Richmond neighbourhood.

August 9, 2024

If the target density for downtown were 1,000 persons/km², what would the target density be for a transit village? If the zoning amendment is not accepted by Council, will the city lose HAF funding?

Mary Ann Hodge

As a member of Climate Action London, we advocate for increased density to support alternative transportation options like public transit. We feel excited about making London's core downtown more dynamic and accessible. I am happy to see greater density allowed in the major intersections but ask you to consider how to reduce some of the conflicts these changes will create.

This proposal reminds me of the discussions that happened during the secondary plan formation for Victoria Park, also in a heritage neighbourhood. There were some

properties that said they were just next door, why couldn't they get the increased height too, and some buildings next door that felt overshadowed by 30 storeys neighbours. The solution with the Victoria Park Secondary Plan seemed to be to step down the allowed heights to transition from the taller buildings to the existing low height. How can we creatively use set backs and step backs to make large buildings less domineering?

The city is currently going through a lot of changes... to the Master Mobility Plan, zoning changes, maybe even updating the building code to incorporate Green Development Standards. We are in a state of crisis. Now is the time to THINK BIG and move away from the negotiating and lobbying of this property versus that property. In my view, Londoners are coming around to the realization that London has grown to a size that it now needs transit to function effectively. This creates the opportunity to look at the city as a whole. If you were to start over, how would you incorporate transit? The city seems to be doing this with its Transit Villages, Mobility Hubs and Rapid Transit initiatives.

Would it not make sense to have a rapid transit line run past the major hospitals in London? I hear that St. Joseph's Health Care is planning to build a larger parking garage. Perhaps if it was better served by transit, patients and staff could navigate to this centre more easily (and save the high cost of parking at the hospital) and use these hospital funds for patient care instead.

At the same time, I do not think that a downtown solely of high rises is the answer. We have heard during Covid, that people need access to green spaces. When we build a high density hub, we also have to think about where these Londoners will have access to green space. Will they have an easy connection to the Thames Valley Parkway? Will there be green space nearby? I understand that Gibbons Park is already considered 'over capacity'. How do we incorporate green space (as opposed to indoor 'amenity space') for this influx of new residents to the neighbourhood? Can we look to successful examples in the neighbourhood like 1 Grosvenor Street? We have a housing and affordability crisis. The status quo no longer works. I urge you to offer residents of London a comprehensive plan for a more functional city that includes high density development to complement existing low density neighbourhoods, not in spite of, low density housing.

I am inspired by the thought that we all want the same things: safety, a warm home, opportunities for our children to grow up and flourish, dignity and choice work that allows us to feel we matter, love and connection and a sense of belonging. How can we turn towards the more beautiful world our hearts know is possible and create that together?

Kelley McKeating and Bruce Jones

The purpose of this letter is to advise you of our strong opposition to the proposal to add a new Transit Village Place Type to the area at and surrounding the Oxford Street-Richmond Street intersection.

We are the owners **REDACTED**, that are situated within the affected area **REDACTED** designated under Part IV of the Ontario Heritage Act. Several other properties within the affected area have been listed in the past as Priority 1 or 2 for potential designation. We are concerned that the proposed Transit Village Place Type, with its focus on redevelopment, increased density, and increased building heights (when compared to current building heights) puts the character of this important northern gateway to London's downtown at risk.

While we support increased density and height in the city of London, the location of that increased density and height should be carefully considered. It should also be noted that many people would prefer to live, work, and play in a community with a "human" scale and some architectural character. Our tenants and the tenants in neighbouring buildings have chosen to live in former single-family homes converted to apartments, not in high-rise buildings in close proximity to other high-rise buildings.

We are also concerned about the potential adverse impact on our properties. Taller buildings on adjacent land, in any direction, would deprive our tenants of sunlight and the ability to see blue sky out of their windows. This would make our properties less desirable as residential and commercial spaces.

If the city insists on proceeding with this official plan and zoning by-law amendment, then we respectfully request that the area bounded by Oxford Street to the north, St. George Street to the east, the train tracks to the south, and Talbot Street to the west be excluded from the new Transit Village. We would also suggest that the maximum building height in the remaining Oxford-Richmond Transit Village area be restricted to 10 or 12 stories – a "human scale" – and that this maximum height be graded down to 5 stories where the Transit Village boundary is immediately adjacent to existing residential or commercial buildings.

We thank you for considering our comments.

Garry Montgomery

I am a resident very close to the Oxford Richmond area. (250 Sydenham St.). I understand the need for housing in London. I also understand how attractive this Oxford/Richmond corner would be for development. It seems to me the information provided has plenty of unanswered questions and with little time for people to respond especially at holiday time. We know there needs to be change but this proposal just seems to be a means of allowing changes which otherwise might not happen. (A bit

sneaky as well.) Zoning is usually good for protecting residents and businesses and for their own planning. Calling this a "Transit Village Place" seems to be self-serving. I would have no objection to changes at this corner but I would not want to see the north east corner of Oxford and Richmond begin to look like Talbot and Central, for example. Once a larger project is approved in our area, it is a slippery slope and it sets a precedent for the neighbourhood and not for the better - as in Toronto at Yonge and Eglinton. Huge condos on Yonge and then filling up several side streets. Plenty of unhappy homeowners.

Richmond will never be considered higher speed as long as there are trains closing down the street. Ideally, Richmond would be a one way going north and Wellington a one way going south - if it went through. It could be Waterloo though. The problem with Oxford is that it is the only east west street for many and thus the slowdowns. Too bad there is no other east/west street close by.

In my opinion, allowing buildings over say six floors on residential side streets is wrong. These other suggested heights would be outrageous and unfair to existing residents. It is unclear if this is your intention. If a very major project at say 20 to 30 floors were on the north east corner of Oxford and Richmond, we at Sir Adam Beck could be looking at the unattractive backside of the project as well as the deliveries, moving trucks, garbage trucks etc. especially since your amendment includes from Oxford Street right up to Sydenham. This would also mean that the entrance to the new building would likely be via Sydenham. Our building **REDACTED**. You are probably aware of the number of accidents that happen at that street and Richmond. I am - I hear the crashes. Vehicles going north on Richmond typically speed and drivers entering Richmond from St. James probably misjudge and cause accidents. Check with the police. There were two in one week not long ago. This possible new building would definitely cause more accidents. There is a constant flow of cars turning north from Oxford (speeding) and it is a short distance.

Most of our residents are retired and do not cause much traffic. A newer project will have very different demographics. I see no reason to include in your proposal that little hump to include houses on Sydenham.

As for the Hellmuth area, any changes there should not even be under consideration other than possibly a few houses closer to Oxford. I often drive by to admire Hellmuth. Does Heritage protected mean nothing?

On the plus side, some development should help retail on Richmond south of Oxford. Pretty sad looking.

I think you need to reconsider this plan and keep people more and better informed.

John Ison

I am a near resident of the area affected by the Transit Village Amendments -Oxford and Richmond and I have read the material distributed to residents.

First, I strongly believe that London needs more housing, more density and a major restoration of the character of the city's core (along with major improvements to other weak city services such as transit, roads, policing, cycling and waste management). The area around Oxford and Richmond has deteriorated significantly over the years. My reasons for choosing to live in this area three years ago included easy access to commercial, professional and transit services as well as the character of the neighbourhood.

It is difficult to understand the implications of this policy change as I do not know what development the current zoning by-laws allow, nor do I know what a Transit Village Place Type is, nor can I find a description on the city's website. If this new designation would allow more commercial/professional services or low-rise housing (6-8 stories) along Oxford Street and Richmond Street, I would be very supportive. In fact, the city should foster low-rise residential buildings along most of Oxford east and west of Richmond. If the change in policy means a stretch of 15-20+ story residential buildings fronting Oxford or Richmond in this "Transit Village", it would destroy the neighbourhood.

London has more vacant developable land (mostly parking lots) in its core than any comparable city I have ever seen. There is no need to build on farmland or in established neighbourhoods to achieve its housing goals.

Dr. Desi Brownstone

I am responding the proposed changes in zoning for the Oxford-Richmond intersection. I have seen and agree with the concerns raised by Dr Rachel Forrester-Jones, Susan Agranove and Dr Robin Baker in their letter to you.

I have some concerns of my own. I am puzzled by the designation of Oxford and Richmond intersection as a Transit Village. There is a level railway crossing (CPR) on Richmond that precludes rapid transit . A North-South Rapid Transit corridor should utilize Wharncliffe Road because the railway crossing is elevated and the road has already been widened.

The proposed Oxford-Richmond intersection Transit Village includes portions of a developed residential area (Bishop Hellmuth Heritage District) in which there are no open lots. There are many empty buildings and lots in the downtown area that are more suitable for development, many of which would not require new construction but rather conversion of existing buildings to residential purposes.

In addition I find the exemption from Minimum Parking Standards to be puzzling.

Parking is already at a premium due to the proximity to St Joseph's Hospital and 2 Heritage Churches.

Why does the proposed Transit Village cross Oxford Street at all?

Thanks for your attention to my concerns.

Dr. Kandice McKee

I am responding to the proposed changes in zoning for the Oxford-Richmond intersection. I have seen and agree with the concerns raised by Dr Rachel Forrester-Jones, Susan Agranove and Dr Robin Baker in their letter to you.

I am puzzled by the designation of Oxford and Richmond intersection as a Transit Village since at this point there is no plan for improvement in transit services at this area. There is a level railway crossing (CPR) on Richmond that precludes rapid transit. A North-South Rapid Transit corridor should utilize Wharncliffe Road because the railway crossing is elevated and the road has already been widened. In addition there is an active plan to widen Wharncliffe at the underpass at the CNR tracks near Horton Street.

The proposed Oxford-Richmond intersection Transit Village protrudes into a developed residential area (Bishop Hellmuth Heritage District). Why are you recommending the incursion of very high density new buildings into a designated heritage area? There are many empty buildings and lots in the downtown area that are more suitable for development and many would not require new construction but rather conversion of existing buildings to residential purposes.

In addition I find the exemption from Minimum Parking Standards to be puzzling.

Parking is already at a premium due to the proximity to St Joseph's Hospital and 2 Heritage Churches. Why does the proposed Transit Village cross Oxford Street at all?

Thanks for your attention to my concerns.

Thank you for providing the information session on July 31, 2024 regarding this application

I have a couple of ongoing concerns that were not addressed that evening

1. Because of previously approved developments in west London it is clear that the north and west legs of the BRT will need to be addressed again. The transport map available to me shows the use of Wharncliffe Road north to Oxford but not beyond there. It was never clear to me when the plans were deferred previously why the city administration had rejected the use of Wharncliffe Road north of Oxford Street particularly when the Richmond route clearly had problems with the CP rail system as well as getting enough land (through expropriation or otherwise) in order to make the bus route feasible while Wharncliffe already had a widened train underpass planned (and now completed)

2. All of the outlines of the increased density development south of Oxford Street provide at least a 2 lane road buffer between residential buildings and the intensified development, You spoke of 10 to 30 year planning but I for one hope that the century old homes facing Sydenham Street will still be there in 10 to 30 years and cannot understand how it can be appropriate to have a building of up to 30 storeys 20 feet from their property line now or in future years.

Would it not be possible to allow for increased residential density by approving 6-8 stories as a maximum on the north side of Oxford to allow for a better transition to the neighbourhood to the north?

Thanks for addressing these concerns

Najet Hassan

I am responding to your “Notice of Planning Application” (hereafter ‘Notice’) invitation for comments on the proposed re-zoning for Oxford-Richmond to include in your report to the City Council, and thank you for the consultation exercise.

We assert that no reasonable person/committee acting responsibly could make an informed decision on re-zoning the area in question because the consultation has so far been inadequate regarding land use, development intensity, and form of development. We would ask that you answer the following questions before proceeding with any recommendations to the City’s Planning and Environmental Committee and we set out our arguments and questions below.

Land use:

Firstly, concerning page 2, para 1 of your Notice “a new Transit Village and accompanying policy would focus new higher-intensity development within areas centrally located near rapid-transit and connecting to the Downtown.” We note that ‘Transit Village’ is defined as “major mixed-use destinations with centrally located rapid transit stations.” However, given that no appreciable improvement in transit services in the area exists at this time (specifically there are no “rapid transit stations”) why does the application refer to these?

Secondly, according to Chapter 5 of the London Plan, the urban type that best characterises the area north of Oxford Street is an Urban Corridor with the potential to be a rapid transit corridor that is dependent on transport improvements. We therefore fail to understand why you are proposing this corridor to be re-zoned as a ‘transit village’ and would ask you to provide your rationale for such a designation.

Thirdly, on your map, there is a protrusion into the North of Oxford neighborhood which includes the Bishop Hellmuth Heritage District. There is also a small section (with one dwelling) on

St George Street which is not included. Please explain how you decided on the area marked in red on your Map i.e. how was it selected and on what basis? Why are you recommending an incursion of very high-density new buildings into a designated heritage area?

Fourthly, while we congratulate the City of London for being awarded a fund to encourage housing supply growth, what proposals are there with respect to appropriate development for the area?

Development intensity:

Please provide the rationale for selecting the parcel of land for re-zoning for new 'higher-intensity' development, given that:

a. the space highlighted on the map for Oxford-Richmond already includes a mix of high rise (on Oxford Street), multiple dwelling housing, mixed with open spaces with trees, retail including pharmacies, coffee shops, a grocery store etc., and medical and health care services in what is a designated heritage area.

b. according to the Bishop Hellmuth Heritage District, Ontario Population & Demographics the Bishop Hellmuth district, is more densely populated than London as a whole. Your proposals will take population density to unacceptable levels.

Form of development: The application states that buildings will be built within a range of heights from 2 to 15 and 20 stories. However, we learn that a report, The London Plan Heights Review, is to be presented to the Planning and Environmental Committee (PEC) dealing with 2.3 (PEC Agenda July 16), "to consider revised maximum building heights in all urban Place Types areas" which specifies amongst other things, an increase from 20 to 30-plus storey height limits. Further, we were very surprised to read in table 3, a recommendation for 'Transit Village' height to be raised to a maximum height of 30 stories. You will understand that although your application notice includes a "NOTE: The Heights framework within the London Plan is currently under review" such a representation to a committee to raise building heights considerably the day after consultation on your application closes, appears disingenuous given that your re-zoning application notice states 20 stories. Even high-rise dwellings of 7-20 stories will significantly impact our area. This conduct does not inspire confidence in the fairness of the consultation exercise in which you have embarked since the information you have provided in the consultation document, in the light of item 2.3, is misleading.

Other Matters:

1. Accessibility of communication. We note that tenants in the area and some business owners who lease their properties have not been consulted in

this exercise, nor have the residents in some of the streets in the immediate vicinity in particular, the Bishop Hellmuth neighborhood which reaches Oxford Street. They have no knowledge of your plans which will impact on them significantly. To our knowledge, there have been no public notices placed in prominent locations in our neighbourhood nor has notice been given in the Londoner newspaper (e.g. July 4 2024 and July 11 2024). This points to

the inadequacy of the consultation process. Furthermore, the application details are written in a way that is confusing to many people; it is not written in plain English and it does not explain the terms used adequately or with clarity such that a reasonable person could understand the implications of the re-zoning. Page 3 paragraph 6 states that "Alternative accessible formats or communication supports are available upon request. Please contact landerv@london.ca for more information." Someone with a disability (e.g. sight impairment or intellectual disability) or older person not using online communication will have been seriously disadvantaged in accessing such 'accessible formats' and we therefore believe this notice contravenes The Accessible Canada Act of 2019.

2. Timescale for consultation: The Notice of Planning Application was sent out on June 13. This has left just over one month for any consultation to occur over the re-zoning when many people are on vacation. We argue for all the reasons/concerns above, this is not enough time for any Planning and Development department to provide reasonable or practicable time or adequate consultation to residents and retailers of the area.

Therefore, we do not believe that your recommendations to the City Council have been adequately informed since sufficient time for genuine consultation has not been given to allow a reasonable person to provide adequate comments on what a change in land use would mean and we ask that you halt your recommendation to the City Council in order to appropriately extend the consultation process in line with statutory requirements to include all those likely to be affected by your proposed re-zoning and to give us time to answer our questions.

Pamela Sancton

I am writing to accept your invitation to give input regarding proposed zoning changes for Oxford-Richmond, as you prepare your report and recommendations for London's Planning and Environmental Committee.

My main concerns are about part of the parcel of land that you have designated to be subject to Transit Village Amendments for the Oxford-Richmond area.

First, I can find no compelling explanation, in the materials I have seen, for drawing the boundary north of Oxford.

Second, there is also no rationale provided regarding how/why it was decided to draw that bit north of Oxford, especially as it encroaches on a designated heritage area, with no guarantee that newly built buildings would not exceed 20+ stories.

A **third** area of concern is the apparent lack of notification to **all** who own property and/or live in the area....I have seen no public signage to alert people to these proposals, thus not giving all those affected a chance to participate and respond with input. This problem is compounded by the short turn-around time you have given for responding (June 13, 2024 - July 15, 2024).

I have read the letter sent to you by Dr. Rachel Forrester-Jones and Susan Agranove **[REDACTED]**. I realize they have outlined other concerns, in addition to these, about this matter. I agree with their conclusion that we need **a)** more information to answer the questions posed, and **b)** a more robust, inclusive consultation process, before you can possibly hope to provide a well thought-out report and recommendations to the Planning and Environmental Committee, based on a thorough study of the area and its inhabitants.

Susan D. Agranove

Please consider this letter as my strong objection to the Application to amend the London Plan regarding the creation of a Transit Village at Oxford and Richmond Streets.

As stated in the City's Notice, the City is reacting to the Housing Accelerator Fund (HAF). Launched in March 2023, the Housing Accelerator Fund (HAF) is a \$4 billion initiative from the Government of Canada that will run until 2026 – 27. The Housing Accelerator Fund is part of Canada's National Housing Strategy (NHS), an \$82+ billion plan to give more Canadians a place to call home.

Yes, the population is growing and needs to be housed. Higher urban density saves urban sprawl and prevents destroying farmlands. However I contend that the thinking and analysis of creating a Transit Village at Richmond and Oxford is badly flawed.

In order to access HAF funds it appears that the City of London has reacted:

- too swiftly. ("Oh my there are \$\$ available – let's grab some.")
- by creating a Transit Village where no TRANSIT HUB exists or is planned.
- without proper consideration of the neighbourhood
- without sufficient time for public consultation and input
- by not considering other London locations that are at existing or planned major transit hubs.

I urge the City of London to do a more extensive analysis of the area and to reconsider the creation of a Transit Village at Richmond and Oxford Streets.

Josephine Pepe

I wanted to reach out as a concerned local business owner regarding the proposed changes to zoning that I heard about with respect to making Oxford and Richmond a transit village.

My understanding is that this would allow for large, 30 story buildings in the area. I have great concerns about this. I own **REDACTED**. I renovated **REDACTED** and spent considerable money to not only keep the heritage aspect of the building but to actually restore many of the historical beautiful features of the building. We made painstaking efforts to keep the charm and beauty of the building because one of the reasons I wanted to open my practice in Old North is that it is my favourite area of the city. I love the character of the homes in this neighbourhood. It is one of the last neighbourhoods of the city that has that old school charm and heritage homes. No cookie cutter homes here.

When my old neighbour approached me about helping him to advocate to change the zoning there, I advised him that I did not agree with him. He had an old building that he was looking to have a developer purchase and he wanted me to consider selling my building as well. I had absolutely no interest in doing so. My practice renovations were a labour of love. It is a true gem in the neighbourhood and I was very excited to open **REDACTED**.

I was born and raised in the city. In elementary school, my mother used to take us on the city bus to CCH for Italian school on Saturday mornings. Later, I attended highschool at CCH. After graduating **REDACTED** and settling down in London, I moved into **REDACTED**. I lived in Old North for 17 years, I am a huge proponent of supporting the small businesses downtown and in Old North. I love this city and I love this neighbourhood and the downtown. I want to see it thrive. I saw what happened to Rapid Transit--a great idea that turned into a terrible idea because one side wouldn't listen to the concerned business owners and how it would affect them. We now have a rapid transit project that is substandard. Instead of King and Queen, that leg should have gone down York Street (how amazing would it have been to have a transit line along York, where you have the Convention Centre, Via Rail, (you used to have the Greyhound station pre-COVID), the BMO Icefields, Western Fair and The Western Fair Market?). Such a lost opportunity because people dug in their heels and wouldn't listen to reason. We could have had transit along Richmond, but again, people dug in their heels and insisted it go through Western. If you want to get adult Londoners to get out of their vehicles and onto transit, I can tell you right now, that that won't happen if we

have to go through Western to do so. For Western students, a better alternative would have been Wharncliffe. Again, connecting many areas of the city. But, I digress.

To have multiple large, multistory buildings in the middle of this area would not serve the neighbourhood nor respect the charm of this neighbourhood.

I hope the city reconsiders this proposal for zoning changes and that they consider the impact this would have on the existing homeowners, residents and businesses.

Thank you for your time and I look forward to your response.

Marlyn Loft

I read with surprise, followed by concern, the notice of planning application for an Official Plan and zoning by-law amendment to add a new Transit Village Place Type at and surrounding the Oxford-Richmond intersection. While I understand the need to increase our housing density in the downtown area and restrict urban sprawl, I don't understand the need for a Transit Village Place at Oxford-Richmond when there is no rapid transit service there and no plans for any.

I am concerned about the height of the buildings the zoning change would permit. At present there is only 1 building higher than 4 storeys in the proposed area. A modest height increase to 10 or 12 storeys would seem reasonable but an increase to 20 would have a significant impact on the nearby quiet residential neighbourhoods.

I am also concerned that the proposed Transit Village Place borders Bishop Hellmuth, a Heritage Conservation District that the City recognized in 2001 as worthy of preservation.

I hope this zoning by-law amendment at Oxford-Richmond will be carefully considered and altered to balance the need to increase housing density and also preserve London's unique irreplaceable heritage neighbourhoods.

Loblaw Companies Ltd. c/o Laura Jamieson, Zelinka Priamo Ltd.

Zelinka Priamo Ltd. are the planning consultants retained by Loblaw Companies Ltd. ("Loblaws") for the above-referenced Transit Village Amendments. Loblaws is the owner of a developed site within the proposed Oxford-Richmond Amendment area, known municipally as 234 Oxford Street East (the "subject lands"). The subject lands are generally located on the north side of Oxford Street East, approximately 20m east of the intersection of Oxford Street West and Richmond Street. The lands are currently occupied by a Valu-Mart grocery store with an area of approximately 1,160 sq m, together with associated surface parking spaces.

On behalf of Loblaws, we have been monitoring the BRT process at the intersection of Oxford Street East and Richmond Street in the context of the existing Valu-Mart and have had numerous discussions with City staff regarding potential future impacts of the

BRT on these lands. We have received the Notice of Planning Application, dated June 13, 2024, related to the proposed Transit Village Amendments, and intend to provide further comments on behalf of Loblaws.

We are particularly interested in how the overarching policies will impact the existing use and operation of the Valu-Mart over the long-term. Changes to the Oxford Street East – Richmond Street intersection may have a significant impact on the loading/receiving area and truck movements to the Loblaws site, which is of great interest to our client in terms of maintaining its existing operations and providing a necessary service to surrounding residents.

We will continue to monitor the implementation of the Transit Village Amendments and look forward to further information regarding the proposed changes, particularly to determine the full impacts of the proposed Amendments on the existing Valu-Mart operations.

We would welcome the opportunity to meet with City staff at the onset of this process to discuss the proposed Amendments in the context of the Loblaws lands in detail.

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

Mary Parks

Please accept my apologies for getting these comments to you later than the due date. Unfortunately an electric transformer in my neighbourhood was ‘fried’ during yesterday’s thunder storm and I was without power for approximately 5 hours.

I have several questions for you to consider in your recommendations to the Planning and Environment committee.

-Why is this area being designated a Transit Village?

The previous council decided that the BRT (Bus Rapid Transit) would not be extended north on Richmond Street, nor east or west, particularly west on Oxford Street. London Transport Commission (LTC) promised better service but no higher level of transit. We have no transit hub in the area at this time so what is the need for the Transit Village??

Does this mean eventual removing the residential, family homes to build blocks of many storied buildings which will create more congestion in the area from what already exists?

Or is the amendment being sanctioned by the city to satisfy a developer wanting to build along Ann Street which has mainly small industries that would be eliminated?

Why these boundaries?

Is it necessary to develop above (north on) Oxford Street? There are unobtrusive businesses on Richmond north of Oxford Street which create a subtle transition to the residential areas of St. George Street, Richmond Street, and Wellington Street. It would also allow for the height difference of high rise buildings to the south and existing buildings in the north.

-How does Heritage fit into this recommendation?

It seems that the Bishop Hellmuth Heritage Conservation District has been ignored. There is one property within the boundary of the Transit Village but the boundary will affect the residential properties next to it. Any development above 4 stories will affect many properties north of the proposed boundaries. And will the public lane be maintained for residents who park off it?

The only residents notified of this amendment were those within the 120m requirement of the City. It would have been prudent to have given notice to all residents of BHCD as this change will impact all of us who live in the area.

-Have the Infrastructure needs of the area been addressed?

More high rise buildings in the area will create more stress on all aspects of the infrastructure...sewers, water, transportation, road maintenance, electrical services, etc. which are already inadequate in this older area of the city.

These are only a few of my concerns re the Amendment for Oxford-Richmond Transit Village. I hope they will be taken into consideration in your report to the Planning and Environment Committee. Please include me future notifications for this and other related changes for this area.

Nathaniel Ninham

I like this idea, but the zones seem far too small to be sufficiently effective. The zones should be much longer and, eventually more should be added.

Diana Coates

Good morning. I will plan to attend meetings affecting Changes within the boundaries of Oxford, Richmond to Huron Sts.

I would appreciate appropriate notifications.

Good morning. I will plan to attend meetings affecting Changes within the boundaries of Oxford, Richmond to Huron Sts.

I would appreciate appropriate notifications.

Jan Sayles

I agree with this notice. Do not proceed .

Mike Wallace

City Wide Heights Framework (Table 8)

- We can support the changes to the maximum storeys being proposed, with the exception of RTC beyond 150 meters, we recommend 20 storeys.
- Additional heights need to reflect construction reality as follows:
- 45 storeys -145 meters
- 20 storeys - 65 meters
- 15 storeys - 48 meters

Neighbourhood Heights Framework (Table 11)

Please accept the following general comments regarding the Heights Review and the proposed OPA. The feedback is based on the information provided to our group at the meeting on Monday July 29th. LDI and its members may provide further detailed comments as we proceed through this OPA process.

- At a minimum, a base condition of 8 stories (midrise as defined in the London Plan) along Major Streets (defined as Civic Boulevard/Urban Thoroughfare in the London Plan)
- We believe the change should be to 12 storeys within a PTA on all Major Streets and 10 storeys on all major streets at intersections with other major streets outside a PTA. This will support transit throughout the City on Major Streets.
- 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.
- At a minimum, a base condition of 4 stories along a Neighbourhood Connector with 6 stories within a PTA.
- With consideration for the above, we suggest an increase to 8 stories (within a PTA) along a neighbourhood connector at the intersection with a neighbourhood connector and an increase to 6 stories along a neighbourhood connector intersecting with all streets above a neighbourhood street (outside a PTA).

Neighbourhood Permitted Uses (Table 10)

- We believe stacked townhouses should be added to the Neighbourhood Streets classification as a permitted use.
- Some examples of locations where this form of housing works include 925 Deveron Crescent and 234 Edgevalley Road.

New Transit Villages

- We recommend the boundary for the Oxford/Richmond Transit Village follow street right of way wherever possible.
- We recommend a review of the southern boundary review opportunity to move further south along Richmond Street to capture more opportunity for property redevelopment that would support transit.

Major Shopping Areas and Strategic Growth Areas

- Defining criteria have not been provided to the industry to understand how and why a major shopping area is determined.
- More time and consultation needed with shopping area owners to confirm their locations and permitted uses. The draft amendment recognizing “Major Shopping Areas” should not be part of this OPA until consultations have been completed.

Additional Considerations

- Points in this section should NOT be referred to staff as an interim direction for site plan to “consider.’
- We need proper consultation on these items and agreement as to which policy document or by-law they are to be included, if at all. We also need to be consulted on appropriate language to be used to address this recommendation from SvN Architects + Planners.

The following is our broad responses to the recommendations:

Floorplate Size:

- We are opposed to the recommended floorplate. The recommended maximum is too small. This will have a direct impact on affordability and is not feasible based on the London market.
- Recently built high rises or those approved in downtown London are clear examples of larger floorplate sizes that work in London.
- In addition, there are a plethora of attractive buildings over 12 storeys in other communities with floorplates larger than 1,100 sq. meters that demonstrate that a restrictive floorplate is not required.
- Unintended consequences will be all new buildings looking the same!

Tower Separation

- Tower separation is too restrictive at 25 meters. Why is the current Setback and Separation guidelines in the Site Plan Control By-law not sufficient?

Setbacks

- The recommended setbacks are a non-starter as there has been no consultation on these recommendations.
- The proposed setbacks will have a direct impact on feasibility and costs of building high-rise projects.

Shadow Study

- Shadow study criteria need to be in place prior to any regulations being introduced.
- Industry needs to be consulted to help develop criteria.

Floor Height

- Floor Height needs to be confirmed not only for the first floor but for other upper floors in mixed use residential developments.

Minimum Size of Units

- The marketplace determines the unit size (1,2 or 3 bedrooms), therefore, there is no need for a guideline ratio.
- City's recent study by Colliers confirms the greatest need is for one- and two-bedroom units.

Glazing Requirements

- Glazing requirements are too subjective. Limits creativity and has a direct impact on energy efficiency of a building making climate change goals challenging.

Zoning in Downtown, Transit Village and RT Corridors

The concept of Pre-zoning all sites within the above placetypes is supported by industry. However, the current proposed zoning regulations, as available through London's Get-Involved web site, will not create an as-of-right permissions environment. The City will continue to see requests for zoning amendments and variances on the vast majority of tall buildings, adding time and cost to the process of building housing in London. This also requires significant Staff resources which are better spent on approving applications facilitated by a flexible and realistic planning framework. Public processes like zoning amendment applications create friction with neighbours. A flexible and implementable set of zoning regulations would remove that conflict from the process of getting housing built.

The industry is not in favour of a significant number of these recommendations or requirements, even as part of the site plan process, let alone being built into zoning.

Industry feels we have not been adequately consulted, including on the content and implementation of the draft TSA zones.

London is fortunate to have so many high-rise builders that call this City home. It makes no sense that these builders are completely ignored when crafting a By-Law for high-rise buildings. Is the vision for London going to be that every new building is identical and inefficient to build? Most of Canada's large cities have an array of different forms and unique designs of high-rises allowing creativity to flourish and add vibrancy and energy to the City. This Draft By-Law contradicts that goal.

In conclusion, we have indicated the areas we can support, with recommended changes, going forward in an Official Plan Amendment. We are also clear that the "additional considerations" need further consultation and input from the industry prior to them being implemented as interim directions, guidelines, additions to current by-laws and/or as new by-laws.

Loresana Onesan

I have followed the lengthy approval process of The London Plan and note with particular interest the frequent number of subsequent amendments in support of high-density residential development. The City's record of approving well planned, high rise residential development that exceeds the recommended height standards in the Downtown, the Transit Villages, and the Transit Corridors demonstrates exceptional foresight and a commitment to "big city thinking". London's rapid and sustained growth has in fact rendered some parts of The London Plan incapable of supporting the type of intensive, high density residential development that is emblematic of a highly functional, transit-oriented urban

environment.

The Heights Framework Review is a positive step in the right direction. There is, in my view, a strong planning rationale for increased height and density provisions in strategic locations that will be supportive of public transit in general, and the BRT in particular. It is also my view however, that the heights and densities proposed for these strategic locations should be increased more substantially than that which is proposed in the Application Details for this proposed amendment to The London Plan.

SoHo Developments and affiliated companies own and intends to develop the property situated at 72-76 Wellington Street, as well as other nearby land holdings in the block on the east side of Wellington Street, south of South Street, and west of Waterloo Street, all adjacent to the recently announced and federally funded riverwalk project along the south branch of the Thames River. The frontage of these lands on Wellington Street is within a Rapid Transit Corridor of The London Plan and will accommodate a

proposed BRT station. The Heights Framework Review proposes these lands be subject to an increase in permitted height to 25 storeys. I bring to your attention however, By-law No. Z.-1-132208 approved by the City of London in 2013, already permitting 26 storeys on our properties. As such, the City's proposal to increase heights and presumably densities in this Rapid Transit Corridor falls short of the development

Dr. Eric Jackson

I know there have been some concerns raised by individuals about the proposed transit village at Oxford/Richmond. I wanted to state this is something that should move forward and this is why.

Urban Development and Sustainability:

- **Economic Growth:** Transit Villages are designed to promote economic development and job creation. The mixed-use zoning will attract businesses and residents, contributing to the local economy.
- **Reduced Reliance on Cars:** The transit station will encourage public transportation, reducing traffic congestion and greenhouse gas emissions. This aligns with sustainable urban development goals.
- **Improved Accessibility:** The Transit Village will provide better access to jobs, education, and healthcare for residents (and students - a huge demographic I think is overlooked and not recognized) in the surrounding area.

2. Addressing Concerns:

- **Shadowing:** While the proposed buildings may cast shadows, careful planning and design can mitigate this issue. For example, using reflective materials or strategically positioning buildings can minimize shadowing.
- **Traffic Congestion:** The city can implement traffic management measures, such as improved road infrastructure or pedestrian-friendly pathways, to address potential traffic concerns.

After speaking with many of my patients, some of whom that are students that attend the many schools in our city, they would benefit the most from a transit hub at this location. Please move forward with this proposed infrastructure.

2) Major Shopping Area Place Type

Smart Centres

'Seeking guidance on how standalone retail will be treated in terms of heights'.

Drewlo Holdings Inc.

Following up on the email below. As mentioned during the July 29th meeting, we're hoping the City can circulate the criteria that is being used to distinguish between "Major" and "Community" Shopping Areas.

Also hoping Staff can provide some feedback on the request to include 1454 Fanshawe Park Rd E as a "Major Shopping Area".

Please advise at your earliest convenience. I assume we are approaching the time that the report needs to be finalized.

Glenn Hickling

I now have had a chance to watch the video replay of the July 31, 2024 London Plan for Transit Villages--Community information Session . Thank you for posting this .

I seek clarification on one of the stated purposes of the new transit villages which was said to be to " streamline the process/policies for mixed uses higher intensity developments ... " .

I am concerned about what this streamlining means to Bishop Hellmuth residents . What streamlining is being considered in terms of impact to Bishop Hellmuth residents ?. Specifically, I would object to any streamlining on any process/policies involved with the assessment of traffic congestion , overshadowing of residential properties or the study of the heritage impact of this project ..

Please advise .

Chris Butler

Part 1

Stuart – please accept this E – Mail as feedback after a deep dive on the Transit Villages - Get Involved London website and a note distributed to the Bishop Hellmuth Community .

Your action on receipt of this note should be to include this feedback & E – Mail in BOTH the Sept 10 PEC Meeting & Sept 24 Full Council Meeting(s) as well as respond to questions # 1 thru # 3 below ;

1. Question # 1 – what rational , value added FOR TAXPAYERS / RATEPAYERS (not developers) is achieved by specifically adding a change in zoning to “ TRANSIT VILLAGE “ for the Oxford St & Richmond St intersection area ? As a resident in the immediate area (ward 6) close to this area , 50 % of the time during very wide peak week day times Oxford St moves at a snails pace if at all and Richmond St is backed up north to the lights at Governor St. There is no hint that this gridlock will ever be solved so why designate it as a TRANSIT VILLAGE only to invite more gridlock ??

2. Looking forward 5 – 10 years AFTER this designation , a reasonable period , what infrastructure changes are required to support this designation change and what will these changes cost ratepayers in terms of capital \$\$\$\$ and or London Transit Servicing delta costs ?? (Example – are you recommending adding 2 more lanes to Oxford St and Richmond St or reducing them to cars transit lanes only for 2 lanes / parks ?? ETC)

3. Looking forward 10 – 15 years AFTER this designation , AS 90 % of this your/ this new transit village area is already designated as a downtown DC Incentive zone(how convenient for developers) , what are the delta costs increases in ANNUAL Ratepayer DC rebaits to the developers who are now building twice to three times the commercial & residential density then prior to this change ?? Also include the delta costs in added DC Exemptions which rate payers are expected to pay .

Feedback Generally ;

· The material to review in all the sites in “ Get Involved London “ (Transit corridors / transit villages / transit corridors and bonus zones downtown) are all written in “ Planner Speak “ and are extremely difficult for an average taxpayer to understand the impact.

· To my knowledge , I have never seen such massive recommended changes to the zoning and configuration / structure / fabric of the City of London without a series of very Public Meetings to draw on our input . I don't think the PEC or Council should feel comfortable with that !

Recommendation

· Move forward with a series of public meetings for all of the above and specially this Richmond / Oxford Transit Village. Stage this up with my Council Trosow.

Use modelling to show the changes and bring other City of London departments to speak to the future commitments and impacts .

My approval is included in this submission for the Clerks Office to add to the Public Record with either the PEC or Full Council Meeting .

Part 2

Stuart >> Appreciate your timely response . Will address these concerns at Council MTG .

- Question # 1 again – What was the rationale for selecting Oxford / Richmond as a transit village other than it's location is at the apex of 3 – 4 perimeter transit villages – centres ?? (Masonville – Wonderland – Bradley Ave) (Deep Downtown PMTS loop area is the real apex) .

AS for the Public MTG request , could you provide the “ metrics “ on number (#) of non – City of London Employed people that attended that July 31 – Community Info Mtg and the lead time in corrected Public Notice that this was announced in the middle of summer vacation season ?

Susan Zammit

2024.08.28

To whom it may concern:

Re: Official Plan and Zoning By-law Amendments of Properties within the Transit Village Place Type

File: OZ-9749

Applicant: City of London

This submission is in regard to the lands in the area of Wonderland Road and Oxford Street that have been designated as a Transit Village. The City of London is requesting the additional zoning provisions of TSA3 and TSA4 for this area to allow for future development densification.

One need only to look at a map to see that the designated Transit Village lands along Wonderland Road are a victim of their own geography, as they are physically trapped between:

- the CP Railway tracks to the north
- the CN Railway tracks to the south
- an existing single-family residential community to the west
- undeveloped lands proposed for future high-rise development to the east

Bringing large numbers of new residents into this area is untenable because they can't get out of the Transit Village without using either Wonderland Road or the surface streets of the surrounding area which were never designed for this kind of traffic.

There is physically nowhere else to go!

For the reasons I will outline below, I strongly object in general to the degree of densification currently being proposed for this area, and I strongly object in particular to the proposed zoning to allow high-rise apartment buildings as tall as 30 storeys.

Traffic... Traffic... TRAFFIC!

It's no secret to anyone who drives in London during rush hour that Wonderland Road is one of the most congested thoroughfares in the city. Traffic funnels onto Wonderland Road from all directions because it's the only place to cross the Thames River in the 6.5 kilometer distance between Wharncliffe Road and Sanitorium Road.

Wonderland Road is also one of only 3 major arteries to continuously traverse the entire north to south span of the city (the others being Highbury Avenue and Veteran's Memorial Parkway/Clarke Road which are both located in the east end). That makes Wonderland Road the only major thoroughfare in the west end of London to provide full north-south access across the entire city. This route is used not only by personal vehicles, but also by commercial vehicles large and small as they go about their daily business in the city.

During rush hour, Wonderland Road routinely gets bogged down from just south of Oxford Street to just south of Gainsborough Road. The most seriously affected section is between Oxford and Beaverbrook which is typically bumper to bumper and very slow moving in both directions. As a consequence of this congestion, traffic spills over onto local secondary and residential streets as frustrated drivers try to find a short-cut to their destinations. This results in intersections in the following locations becoming difficult and dangerous for pedestrians to navigate:

- Beaverbrook & Horizon
- Beaverbrook & Capulet
- Capulet & Silversmith (adjacent to a public playground)
- Capulet Lane & Capulet Walk

Simply put, Wonderland Road north currently reaches its maximum capacity at peak times.

It is unfortunate indeed that the area proposed for the densest TSA4 zoning coincides with the exact area of Wonderland Road that already has the worst traffic problem, with very few solutions in sight. Realistically, increased housing density in this area **WILL** increase the number of private vehicles on local roads, because it's unrealistic to expect that all newcomers will arrive without a vehicle and unlikely that many current residents will chose to give up their cars altogether.

Currently, high density residential development continues to intensify in the Wonderland and Fanshawe Park Road area, and bedroom communities surrounding London such as Ilderton and Lucan to the north as well as St. Thomas to the south continue to grow. As a result of this growth, the traffic volume on Wonderland Road is bound to increase year over year even prior to the start of any building within the designated Transit Village.

To plan such an intense infilling project along this major transportation corridor is a traffic disaster in the making. If the new zoning amendments are passed, the sheer magnitude of the population densification that results would absolutely overwhelm the capacity of Wonderland Road north.

As was stated by Nancy Pasato at the July 31st public meeting, the London Transit Commission has not yet made any commitments to providing enhanced public transit for the designated Transit Villages. As there has been no buy-in from the LTC to this point, the public is left to assume that any public transit improvements would lag far behind the fast-tracked development process for these areas. Regrettably, the LTC prefers to be reactive rather than proactive in these matters. As a consequence, the traffic issues for Wonderland Road are going to get much worse before they can be expected to get any better.

As a concerned resident of the Wonderland Transit Village area, I find the City's plan long on expectations but decidedly short on details, which leaves me with far more questions than answers...

- With lack of concrete public transit plans in place for the Wonderland/Oxford area, how is future intensive infilling expected to affect traffic congestion in this location in the short and mid-term range?
- Where can I find the research documents regarding projected traffic flow as a result of densification in this area?
- What are the future plans for traffic flow improvements in this area?
- Are there any plans to change the traffic light patterns at the Wonderland/Oxford intersection to mirror that of the intersection of Wellington Road and Commissioners Road to improve traffic flow and pedestrian safety?
- Are there any plans to add an advanced green turning light on Beaverbrook at Wonderland so cars can turn safely before pedestrians are allowed to use the crosswalks?
- With the development of the Transit Village, are there plans to provide future dedicated bus lanes?
- If so, will roads be widened to accommodate new bus lanes, or will new bus lanes be at the cost of current general vehicular traffic lanes? How would this affect traffic congestion?
- Is it possible for the City to offer the Costco warehouse store incentives to build a new location farther north and away from Wonderland Road to remove a major source of the vehicular chaos surrounding its current location?

Can we look at another solution?

I realize that there is a need to build more housing, and that available land needs to be used wisely, and I also understand that London needs a transit hub in the northwest corner of the city. I am in no way disputing these needs, but I do seriously question the

wisdom of selecting the location of Wonderland and Oxford for such an aggressive densification plan. Unless and until the City of London has formal plans to build additional bridges to span the river in the west end, Wonderland Road will continue to carry the majority of the north/south traffic for the growing west end of the city as well as communities beyond the city's boundaries. The City needs to look at every possible option to support and enhance the movement of traffic through this vital corridor.

I would respectfully suggest that the lands already slated for development along Oxford Street between Cherryhill Boulevard and Proudfoot Lane in the Mud Creek area would be a superior location for TSA3 and TSA4 zoning. This location would give future residents a greater number of options for movement into and out of the densification area via Beaverbrook, Farah, Proudfoot and Cherryhill. Increased traffic volumes would be spread between Oxford Street and Wonderland Road, thus easing the burden on Wonderland. As a brand-new development, this area could be purpose built from scratch with all the traits of the TSA3 and TSA4 zoning provisions without subjecting the current residents of the Wonderland/Oxford community to any of the negative issues that they are opposed to such as:

- Years worth of heavy construction traffic and noise
- Increased traffic on Wonderland
- Increased traffic on secondary and residential streets
- New 30 storey high-rises overshadowing existing buildings
- Significant disruption required to upgrade underground infrastructure

This plan would achieve all of the desired attributes of a Transit Village but would significantly reduce the negative side effects of redeveloping an existing area.

I would also suggest considering the following:

- Reconfiguring Farrah Road east of Wonderland into a one-way street eastbound (to be extended into Mud Creek development lands) including a dedicated bus lane
- Reconfiguring Beaverbrook Ave. east of Wonderland into a one-way street westbound (to be extended into Mud Creek development lands) including a dedicated bus lane
- Situating the Protected Major Transit Station Area (PMTSA) in the middle of the Mud Creek lands between these two one-way streets

Using this configuration, buses from multiple routes would be able to pass through the Transit Station with easy access via Proudfoot, Cherryhill, Farah, and Beaverbrook. The PMTSA would be conveniently located in the middle of the most densely populated area, providing the most convenient selection of public transit options close to the most

people. Current residents of the area will still benefit, as they will only be a short bus ride away from the new PMTSA which will link them to the rest of the city.

As it would be a new development, streets in the Mud Creek area could be purpose built to accommodate bus rapid transit lanes. The City would still achieve a Transit Village in the north-west quadrant, but it would be relocated slightly to the east on an adjacent property. Infill of the currently proposed area could still proceed, albeit under the current zoning provisions.

I feel that this would be a win/win/win solution for the City of London, for the Wonderland/Oxford community residents both present and future, and for people who use Wonderland Road to get where they need to go every day in our fine city.

Thank you for your time and your consideration,

Susan Zammit

REDACTED