

## Report to Planning and Environment Committee

**To:** Chair and Members  
Planning & Environment Committee

**From:** G. Kotsifas P. Eng.,  
Managing Director, Development & Compliance Services and  
Chief Building Official

**Subject:** Underhill Holdings London Inc.  
126 Oxford Street West

**Public Participation Meeting on: May 27, 2019 at 5:30**

## Recommendation

That, on the recommendation of the Director, Development Services based on the application of Underhill Holdings London Inc. relating to the property located at 126 Oxford Street West, the request to amend Zoning By-law No. Z.-1 to change the zoning of the subject property **FROM** a Residential R2 (R2-2) Zone which permits single detached dwellings, semi-detached duplex and converted dwellings **TO** a Residential R3 Special Provision (R3-2 (—)) Zone to permit single detached dwellings, semi-detached dwellings, duplex dwellings, triplex dwellings, converted dwellings and fourplex dwellings, **BE REFUSED** for the following reasons:

- i. The requested amendment is not consistent with the policies of the *Provincial Policy Statement, 2014* that encourage efficient development and land use patterns, the identification of appropriate locations for intensification and redevelopment, and development that is consistent with development standards such as those approved for the Near Campus Neighbourhoods.
- ii. The requested amendment does not conform to the Residential Intensification policies of the '89 Official Plan which direct intensification to ensure that character and compatibility with the surrounding neighbourhood is maintained.
- iii. The requested amendment does not conform to the Transit Corridor Place Type or the policies for Near Campus Neighbourhoods regarding coordinated and comprehensive applications for intensification as opposed to site-specific developments.
- iv. The requested amendment does not conform to the Transit Corridor Place Type or the policies for Near Campus Neighbourhoods which encourage intensification in medium and high density forms and discourage continued intensification in low density forms of housing.
- v. The requested amendment does not conform to the Residential Intensification policies of The London Plan which direct intensification to ensure that character and compatibility with the surrounding neighbourhood is maintained.
- vi. The requested amendment would constitute "spot" zoning and is not considered appropriate in isolation from the surrounding neighbourhood. The subject site does not have any special attributes which warrant a site specific amendment to permit the proposed form and intensity of development.

## Executive Summary

### Summary of Request

The requested amendment is to rezone the land from a Residential R2 (R2-2) Zone which permits single detached dwellings, semi-detached duplex and converted dwellings to a Residential R3 Special Provision (R3-2 (L)) Zone to permit single detached dwellings, semi-detached dwellings, duplex dwellings, triplex dwellings, converted dwellings and fourplex dwellings with two (2) parking spaces and a 0.0m front yard setback.

### Purpose and the Effect of Recommended Action

The purpose and effect of the amendment is to refuse the proposed amendment to Zoning By-law Z.-1 to permit a fourplex dwelling.

### Rationale of Recommended Action

1. The requested amendment is not consistent with the policies of the 2014 *Provincial Policy Statement* that encourage efficient development and land use patterns, the identification of appropriate locations for intensification and re-development, and development that is consistent with development standards such as those approved for the Near Campus Neighbourhoods.
2. The requested amendment is not consistent with the Residential Intensification policies of the '89 Official Plan which direct intensification to ensure that character and compatibility with the surrounding neighbourhood is maintained.
3. The requested amendment is not consistent with the policies for Near Campus Neighbourhoods (962) regarding coordinated and comprehensive applications for intensification as opposed to site-specific developments.
4. The requested amendment is not consistent with Council adopted London Plan, Rapid Transit Corridor Place Type policies (\*826) regarding coordinated and comprehensive applications for intensification.
5. The requested amendment is not consistent with the policies for Near Campus Neighbourhoods (962) which encourage intensification in medium and high density designations and forms and discourage continued intensification in low density forms of housing.
6. The requested amendment is not consistent with the Council adopted London Plan, Rapid Transit Corridor Place (\*841) policies which encourage intensification in mix used forms and discourage any intensification in low density residential forms of housing.
7. The requested amendment would constitute "spot" zoning and is not considered appropriate in isolation from the surrounding neighbourhood. The subject site does not have any special attributes which warrant a site specific amendment to permit the proposed form and intensity of development.

## Analysis

### 1.0 Site at a Glance

#### 1.1 Property Description

The subject lands are located on the south side of Oxford Street West, west of Rathowen Street. The City issued demolition permits on September 20, 2018 to remove the single detached dwelling and backfill and level the lot.

#### 1.2 Current Planning Information (see more detail in Appendix D)

- Official Plan Designation – Low Density Residential- Near Campus Neighbourhoods
- The London Plan Place Type – Transit Corridor- Near Campus Neighbourhoods
- Existing Zoning –Residential R2 (R2-2)

#### 1.3 Site Characteristics

- Current Land Use – (vacant)
- Frontage – 20 metres
- Depth – 33 metres
- Area – 697 square metres
- Shape – rectangular

#### 1.4 Surrounding Land Uses

- North – townhouse/ detached dwellings
- West – Three unit converted dwelling
- East – Duplex dwellings
- South –Open Space, Emprise Avenue City Park

#### 1.5 Location Map



## 2.0 Description of Proposal

### 2.1 Development Proposal

The proposed concept plan for the site illustrates a fourplex dwelling that is three storeys in height.

The proposed site plan (included in Figure 1) and preliminary building concept and elevations incorporates the following elements:

- Access to the site is from Oxford Street West.
- A three-story building, consisting of 4 units with 3 bedrooms in each unit for a total of 12 bedrooms.
- The parking is situated in the rear yard, 3 parking spaces are proposed whereas 4 parking spaces are required.

## 3.0 Relevant Background

### 3.1 Proposed Site Plan

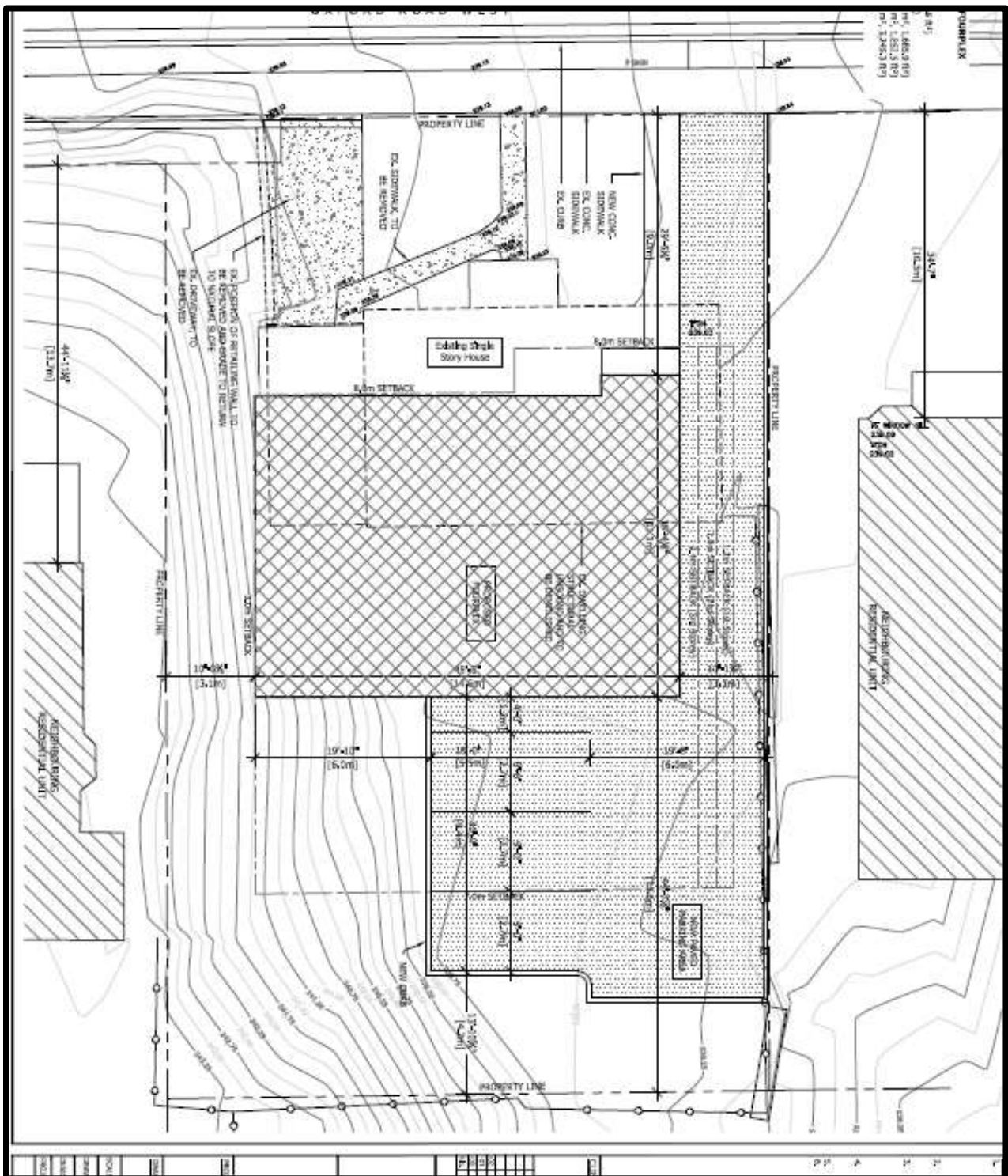


Figure 1

Proposed Elevations

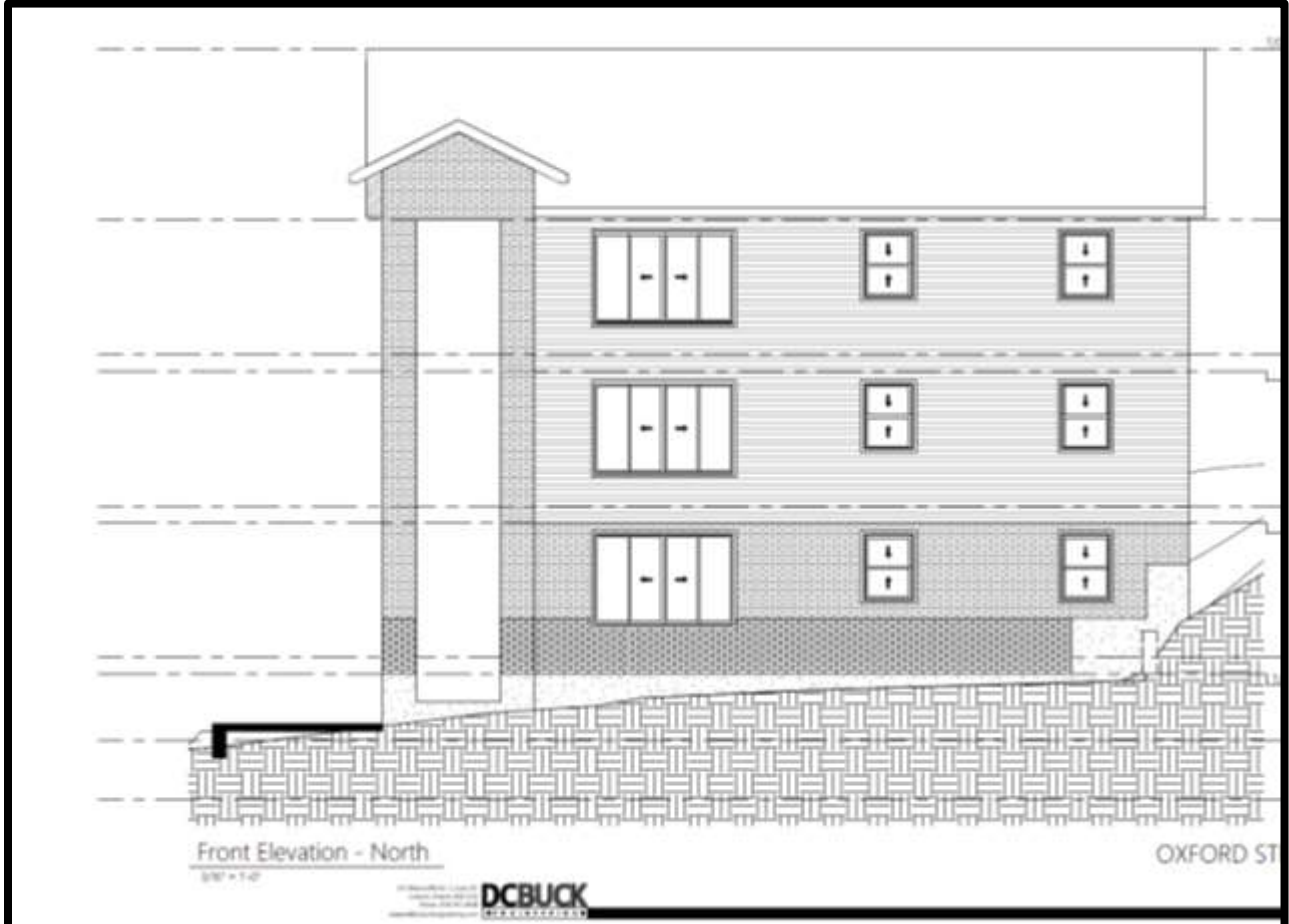


Figure 2

Rendering –



Figure 3

### 3.2 Requested Amendment

The Applicant has requested to amend Zoning By-law Z.-1 from a Residential R2 (R2-2) Zone to a Residential R3 Special Provision (R3-2 (\_)) Zone with a 0.0 minimum front yard setback and 2 parking spaces whereas 4 parking spaces are required and the conceptual site plan depicts 3.

### 3.3 Community Engagement (see more detail in Appendix A)

There was one comment received in support of the application during the community consultation period.

### 3.4 Policy Context (see more detail in Appendix B)

#### **Provincial Policy Statement, 2014**

The *Provincial Policy Statement, 2014* (PPS) provides policy direction on matters of provincial interest related to land use planning and development. The PPS is more than a set of individual policies. It is intended to be read in its entirety and the relevant policies are to be applied to each situation.

1.1.3.3 Planning authorities shall identify appropriate locations and promote opportunities for intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.

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

While the PPS is generally supportive of residential infill and intensification, the policies of the PPS largely require that intensification goals and objectives be developed at the municipal level and are not intended to be used to justify all intensification proposals indiscriminately. The City of London has fulfilled the guidelines of the PPS by identifying and encouraging opportunities for intensification in appropriate forms and in appropriate locations. The proposed intensification at this location does not meet the intent of the Municipal approved Near Campus Neighbourhoods that were adopted by Municipal Council in conformity to the PPS.

#### **The London Plan**

The London Plan is the new Official Plan for the City of London (Council adopted, approved by the Ministry with modifications, and the majority of which is in force and effect). The London Plan policies and maps under appeal to the Local Planning Appeals Tribunal (Appeal PL170100) are not in force and effect and are indicated with an asterisk throughout this report. The London Plan policies under appeal are included in this report for informative purposes indicating the intent of City Council, but are not determinative for the purposes of this planning application.

The subject lands are located within the \*Rapid Transit Corridor Place Type in The London Plan. The range of primary permitted residential, retail, service, office, cultural, institutional, recreational, and other related uses in the form of mixed used buildings. Consideration has also been given to Near Campus Neighbourhoods specific-area policies under Section \*962, as well as the general policies of the Our Strategy, Our City, City Building and Design, Rapid Transit Corridor Place Type, and Our Tools sections.

Visions, Key Directions

62\_3 Think “big picture” and long-term when making planning decisions – consider the implications of a short-term and/ or site-specific planning decision within the context of this broader view.

62\_9 Ensure new development is a good fit within the context of an existing neighbourhood.

The proposed amendment would permit a site specific amendment. The development does not meet the long term planning goals of the Transit Corridor to consolidate lands for future coordinated development. The proposed development will not be a good fit within the existing neighbourhood as it proposes a form of development that does not currently exist in the neighbourhood.

An excerpt from The London Plan Map 1 – Place Types is found at Appendix D.

### **1989 Official Plan**

The Official Plan contains Council's objectives and policies to guide the short-term and long-term physical development of the municipality. The policies promote orderly urban growth and compatibility among land uses. While the objectives and policies in the Official Plan primarily relate to the physical development of the municipality, they also have regard for relevant social, economic and environmental matters. Because the application for Zoning By-law Amendment falls under the policies for *Near Campus Neighbourhoods* of the Official Plan, it is subject to a Planning Impact Analysis and other application assessment requirements.

More information and detail on applicable planning policy is available in Appendix B of this report.

## **4.0 Key Issues and Considerations**

### **4.1 Use**

#### London Plan

*\*Policy 837\_ Mixed-use buildings with a broad range of residential, retail, service, office, cultural, institutional, recreational, and other related uses will be encouraged in the Rapid Transit Corridor Place Type. Large floor plate, single use buildings will be discouraged.*

The requested amendment to permit the development of a fourplex, representing single use low density form of housing is not consistent with the vision of the Rapid Transit Corridor Place Type.

#### Official Plan 89

City of London Official Plan policies encourage infill residential development in locations where existing land uses are not adversely affected, where development can efficiently utilize existing municipal services and facilities and promotes development which enhances the character of the residential area. The proposed twelve (12) bedroom fourplex may adversely affect the converted single detached dwelling to the west and duplex dwelling to the east due to lack of landscaping, and reduced parking requirements. The form of the proposed building does not typically lend itself to on-site property or waste management mechanisms. The requested amendment represents an ad-hoc approach to land-use planning.

The recommended amendment to permit the development of a fourplex use is not consistent with the policies of the Official Plan and more specifically the policies for Near Campus Neighbourhoods.

### **4.2 Intensity**

#### London Plan

*\*Policy 839\_ 1. and \*Table 9 provides the range of permitted heights in the Rapid Transit Corridor Place Type. Buildings within the Transit Village Place Type will be a minimum of either two (2) storeys or eight metres in height and will not exceed eight (8) storeys in height. Lot assembly is encouraged to create comprehensive developments that reduce vehicular accesses to the street and to allow for coordinated parking facilities.*

The proposed zoning amendment for this lot is not consistent with the intended intensity of the Rapid Transit Corridor Place Type given its site specific nature which precludes lot assembly, consolidation of vehicular access, and coordination of parking facilities.

#### Official Plan 89

Residential Intensification may be permitted in the Low Density Residential designation through an amendment to the Zoning By-law. Where the subject lands are within a specific residential area identified under policy 3.5, the application of the residential intensification policies will supplement those specific policies, but will not supersede them.

126 Oxford Street West is located within the Near Campus Neighbourhood Area (Policy 3.5.19). As noted, intensification proposals are required to be in conformity with the Near-Campus Neighbourhood Policies and where there is conflict with the more general Intensification Policies, the Near-Campus Neighbourhood policies shall prevail.

The proposed three (3) storey fourplex zoning amendment for this lot is not consistent with the intended intensity of the Near Campus Neighbourhood policies.

#### Policies for Near-Campus Neighbourhoods Strategy (NCN)

As the NCN states, one of the characteristic forms of intensification *not* considered appropriate in Near Campus Neighbourhoods includes large numbers of bedrooms within a single building, particularly within multi-unit buildings such as the proposed fourplex dwelling. One of the indicators of the ability of the lot to accommodate a certain level of intensity is the required minimum number of parking spaces and conformity to the applicable zoning regulation of the proposed zone. The proposed fourplex meets the requirements of lot area and lot frontage of the proposed Residential R3 (R3-2) Zone regulations however twelve (12) bedrooms with three (3) parking spaces and the encroachment into the required road allowance is a more telling depiction of the over-intensification of the proposed development.

### **4.3 Form**

#### London Plan

*\*Policy 841 Planning and development applications will be discouraged if they result in the creation of one or more isolated remnant lots that cannot be reasonably developed or assembled with other parcels in the Place Type to develop in accordance with the long-term vision for the Corridor*

The proposed three (3) storey fourplex zoning amendment for this lot is not consistent with the intended form in the Rapid Transit Corridor Place Type given its ad hoc nature that is not conducive to consolidation with abutting lands.

#### Official Plan 89

The intent of the Near-Campus Neighbourhoods Policies ('NCN) is to provide guidance to encourage residential intensification proposals that are located in the appropriate areas and constructed in purpose-built, higher density building forms designed to accommodate the anticipated level of intensity and are professionally managed to mitigate concerns related to property maintenance, noise, garbage, and parking, among others.

Within Near Campus Neighbourhoods applications for site-specific Zoning By-law amendments and other modifications had been occurring incrementally, on a site-specific basis, in the absence of a comprehensive plan to direct intensification to appropriate areas. While individually an application may seem minor and insignificant, collectively these have resulted in a significant amount of intensity being added to Near Campus Neighbourhoods, creating impacts related to a loss of residential amenity, By-law Enforcement concerns, loss of neighbourhood stability, and other issues.

Notwithstanding these qualities, the Near Campus Neighbourhood Policies refer to preferred forms of residential intensification in Near Campus Neighbourhoods. These forms are medium and large scale apartment buildings that are professionally managed and situated at appropriate locations.



Appropriate locations for these professionally managed apartment buildings are those areas within near-campus neighbourhoods that are designated Multi-Family, Medium Density Residential and Multi-Family, High Density Residential, located along arterial roads and serviced by public transit

The proposed three (3) storey fourplex zoning amendment for this lot is not consistent with the intended form of the Near Campus Neighbourhood policies.

#### **4.4 Ad Hoc/ Site Specific Zoning**

A concern is that an ad-hoc Zoning By-law amendment on the subject site would set precedent for the approval of increased intensity on other lands along this corridor, despite the size of the subject lot. An amendment could establish a benchmark upon which other requests for amendments may be based, making it difficult to refuse an application for a change in land use on parcels of land in proximity to the subject site that meet the requirements of this or other slightly less intense zones not in keeping with the intent of the Residential R2 Zone. In other words, an approved amendment could create a level of expectation that future applications for intensification along Oxford Street West may also be approved. This again speaks to the comprehensive policy adopted by Council in the Near Campus Neighbourhoods.

Policy 3.5.19.10 states that in Low Density Residential Areas in Near Campus Neighbourhoods, residential intensity shall only be supported where a proposal represents a site specific amendment for a lot that is unique within its context. There is nothing unique about the subject site that would distinguish it from neighbouring properties. Therefore a request for residential intensification on this site is not consistent with the policies of the Official Plan,

#### **4.6 Road Widening**

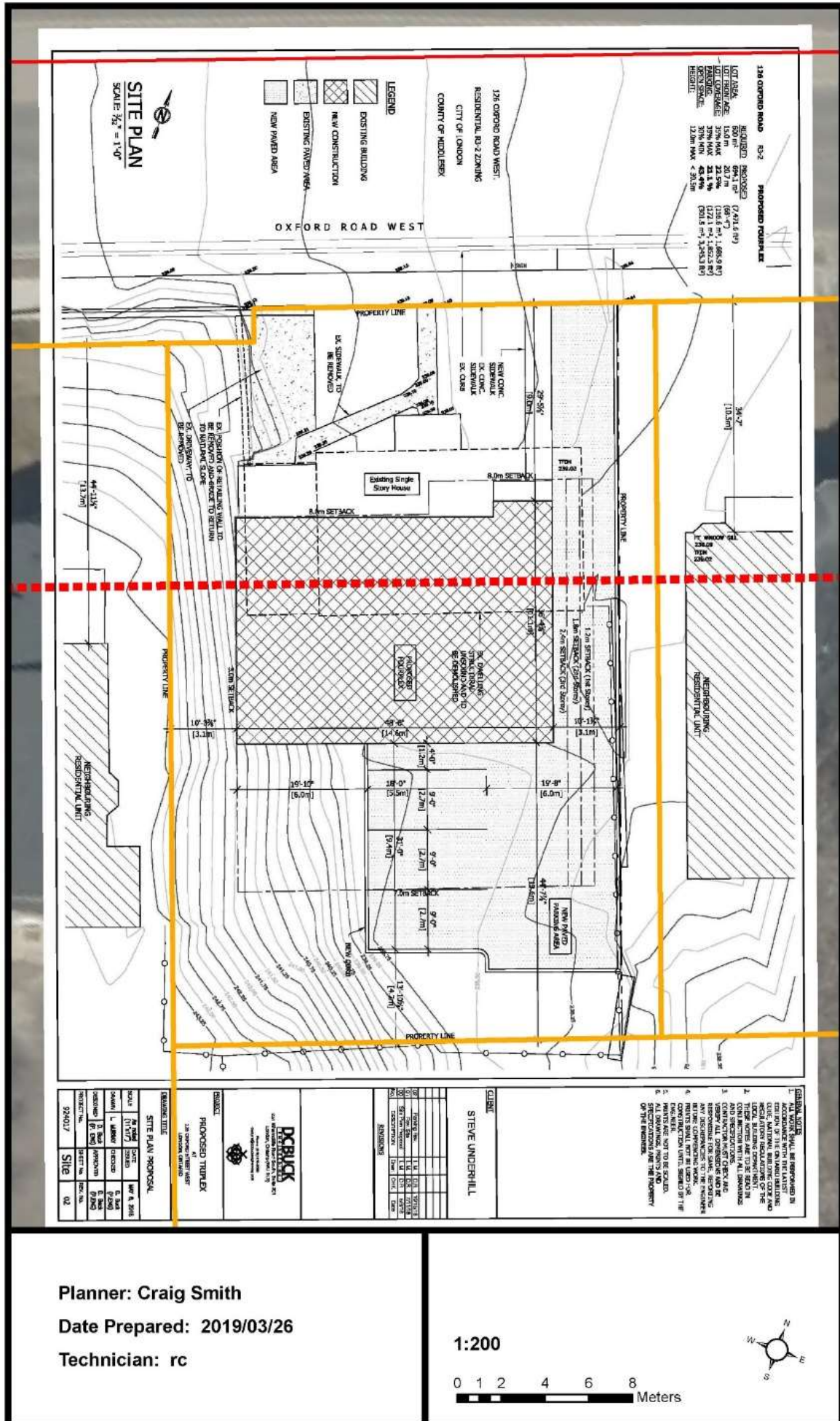
The property is located on Oxford Street West. Oxford Street West is identified as a Rapid Transit Corridor. A road widening of 24m from centreline is required for the Rapid Transit Corridor. City of London Transportation staff state: *Transportation **does not support** the construction or location of any structures within the ultimate road widening dedication of 24.0m from centre line required along Oxford Street, which is identified as a rapid transit corridor.*

As per the below diagram the proposed fourplex is located in the required 24m road allowance. The proposed zoning by-law amendment would allow a use that cannot be fully accommodated on the lot.

This portion of Oxford Street West is designated as a Rapid Transit Corridor in The London Plan. A required ultimate right of way of 24 metres from centreline is required to accommodate the proposed uses and forms of development that are contemplated in Rapid Transit Corridor Place Type in The London Plan. Further, the ultimate 24 metre right of way is required to implement the approved Bus Rapid Transit plan by supporting the existing feeder transit routes on this corridor and to provide for future rapid transit uses as may be required.

Site Plan Showing Approximate Location of 24m Road Allowance

126 OXFORD STREET WEST



#### **4.6 Upper Thames River Conservation Authority**

The subject lands are regulated by the UTRCA in accordance with Ontario Regulation 157/06 made pursuant to Section 28 of the Conservation Authorities Act. The Regulation Limit is comprised of a riverine erosion hazard, landowners are required to obtain written approval from the Authority prior to undertaking any site alteration or development within this area including filling, grading and construction.

The UTRCA requires that 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. As of the date of this report the applicant has not obtained a Section 28 permit or established a development limit along the ravine corridor as per the UTRCA's requirements.

### **5.0 Conclusion**

The requested amendment is not consistent with the policies of the 2014 *Provincial Policy Statement* that encourages efficient development and land use patterns, the identification of appropriate locations for intensification and redevelopment, and development that is consistent with development standards such as those approved for the Near Campus Neighbourhoods..

The requested amendment is not consistent with the Residential Intensification policies of the '89 Official Plan which direct intensification to ensure that character and compatibility with the surrounding neighbourhood is maintained.

The requested amendment is not consistent with Council adopted Rapid Transit Corridor and Near Campus Neighbourhoods Strategy policies regarding coordinated and comprehensive applications for intensification as opposed to site-specific developments.

The requested amendment is not consistent with Council adopted policies pertaining to the Near Campus Neighbourhoods Strategy which encourage intensification in medium and high density designations and forms, and discourage continued intensification in low density forms of housing.

The requested amendment would constitute "spot" zoning and is not considered appropriate in isolation from the surrounding neighbourhood. The subject site is not unique and does not have any special attributes which warrant a site specific amendment to permit the proposed form and intensity of development within the context of the surrounding neighbourhood.

This application perpetuates the ad-hoc amendment applications emblematic of many low density neighbourhoods in proximity to the University of Western Ontario, pressured for greater intensification which have resulted in negative impacts related to parking, garbage, public nuisance, and property standards issues. It is not sound land use planning to support an amendment that has resulted in on-going enforcement in Near Campus Neighbourhoods.

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|---|--|
| <b>Prepared by:</b>   | <b>C. Smith, MCIP, RPP<br/>Senior Planner, Development Services</b>  |
| <b>Recommended by:</b>  | <b>Paul Yeoman, RPP, PLE<br/>Director, Development Services</b>  |
| <b>Submitted by:</b>  | <b>George Kotsifas, P.ENG<br/>Managing Director, Development and Compliance<br/>Services and Chief Building Official</b> |
| Note: The opinions contained herein are offered by a person or persons qualified to provide expert opinion. Further detail with respect to qualifications can be obtained from Development Services |  |

May 16, 2019  
CS/

CC: Michael Tomazincic, Manager, Current Planning

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## Appendix A – Public Engagement

### Community Engagement

**Public liaison:** On January 28, 2019, Notice of Application was sent to all property owners with 120 m of the property. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on January 31, 2019. A “Planning Application” sign was also posted on the site.

**Nature of Liaison:** The purpose and effect of this zoning change is to permit a fourplex dwelling. Possible change to Zoning By-law Z.-1 **FROM** a Residential R2 (R2-2) Zone **TO** a Residential R3 Special Provision (R3-2 ( \_)) Zone with a 0.0 minimum front yard setback and 2 parking spaces whereas 4 parking spaces are required

**Responses:** One comment was received.

Feb.15, 2019

To Whom it may concern

I own a property in close proximity to this proposed new development. I am generally in support of the increase in density for the area. It is well serviced by public transit so reducing the parking requirement will allow a more affordable unit for someone who does not require a vehicle. The general area is quite well developed and is in walking distance to many resources including a nearby mall & the downtown. New built structures require building under a modern building code. This allows for properly designed and engineered buildings to suite multiple tenants.

As well I have had personal dealings with the applicant and he is of very reputable character. And i believe it would become a building that could help revitalize the very old streetscape in that area

Dave Crackel  
Owner 171 Cambridge St.

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### Agency/Departmental Comments

#### Engineering

*Transportation **does not support** the construction or location of any structures within the ultimate road widening dedication of 24.0m from centre line required along Oxford Street, which is identified as a rapid transit corridor.*

#### Development Services Engineering

*No comments for the re-zoning application.*

*The following items are to be considered during the development application approval stage:*

#### Water

- *Water is available from the 300mm PVC under the north side of Oxford Street West*
- *The existing water service cannot be reused and will need to be decommissioned.*
- *Specific comments may be offered at the time of development application.*

#### Wastewater

- *The sanitary sewer available for the proposed new fourplex dwelling is the 250mm sanitary sewer on Oxford Street West.*
- *The structure should have a new 150mm diameter sanitary PDC laid @ 1% to the said 250mm sanitary sewer, all to City Standards.*

**Transportation**

- *Road widening dedication of 24.0m from centre line required on Oxford Street West*
- *Detailed comments regarding access design and location will be made through the site plan process*

**Stormwater**

- *The site is located in the regulated area of the Upper Thames River Conservation Authority and therefore, permits/approvals from them may be required as part of any future development application.*
- *As per as-constructed plan # 4893S2, the site at C=0.50 is tributary to the existing 525mm storm sewer along Oxford St W. Any changes in the C value of 0.5 required to accommodate the proposed development will trigger the need for hydraulic calculations (storm sewer capacity analysis) to demonstrate that capacity of the sewer system to service the site is not exceeded and that on-site SWM controls will be designed to the satisfaction of the City Engineer. On-site SWM controls design should include, but not be limited to required storage volume calculations, flow restrictor sizing, etc.*
- *Any proposed LID solution should be supported by a Geotechnical Report and/or hydrogeological investigations prepared with focus on the type of soil, its infiltration rate, hydraulic conductivity (under field saturated conditions), and seasonal high ground water elevation.*
- *Additional SWM related comments will be provided upon future review of this site.*

Upper Thames River Conservation Authority (UTRCA)



*"Inspiring a Healthy Environment"*



March 4, 2019

City of London – Planning Services  
P.O. Box 5035  
London, Ontario N6A 4L9

**Attention: Craig Smith** (sent via e-mail)

Dear Mr. Smith:

**Re: File No. Z-9007 - Application to Amend the Zoning By-Law**  
**Applicant: Underhill Holdings London Ltd. c/o Steven Underhill**  
**Agent: Zelinka Priamo c/o Casey Kulchycki**  
**126 Oxford Street West, London, Ontario**

The Upper Thames River Conservation Authority (UTRCA) has reviewed this application 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 and natural heritage policies contained in the *Provincial Policy Statement (2014)*. The *Upper Thames River Source Protection Area Assessment Report* has also been reviewed in order to confirm whether the subject lands are located in a vulnerable area. The Drinking Water Source Protection information is being disclosed to the Municipality to assist them in fulfilling their decision making responsibilities under the Planning Act.

**PROPOSAL**

The proposed Zoning By-law Amendment application would rezone the lands from Residential (R2-2) to Residential R3 Special Provision (R3-2(\_)) to allow for the construction of a fourplex dwelling.

**CONSERVATION AUTHORITIES ACT**

As shown on the enclosed mapping, the subject lands are regulated by the UTRCA in accordance with Ontario Regulation 157/06 made pursuant to Section 28 of the Conservation Authorities Act. The Regulation Limit is comprised of a riverine erosion hazard. 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.

In addition to the riverine flooding hazard, the subject lands also contain an online pond and a number of mature trees. The UTRCA conducted a Site Visit on May 15, 2018 as a scoping meeting with Zelinka Priamo and BioLogic for the preparation of an Environmental Impact Study for the proposed development (at the time, an apartment building). An Environmental Impact Study prepared by BioLogic was submitted as a part of this application.

UTRCA Comments  
File No. Z-9007

### **UTRCA ENVIRONMENTAL PLANNING POLICY MANUAL**

The UTRCA's Environmental Planning Policy Manual is available online at:  
<http://thamesriver.on.ca/planning-permits-maps/utrca-environmental-policy-manual/>  
The policy which is applicable to the subject lands includes:

#### **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 which is consistent with the Provincial Policy Statement (PPS) and is intended to limit the number of owners of hazardous land and thereby reduce the risk of unregulated development etc.

#### **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.

The UTRCA attended a Site Visit on July 10, 2018 with James McKay (City of London Ecologist), Casey Kulchycki (agent), and Steven Underhill (applicant) to review the erosion hazard on-site and determine report requirements. On November 1, 2018, the UTRCA advised that a favourable Geotechnical Assessment would be required for this application. Please refer to the "Peer Review of Technical Reports" section of this letter for comments on the Geotechnical Assessment.

### **DRINKING WATER SOURCE PROTECTION**

The subject lands have been reviewed to determine whether or not they fall within a vulnerable area (Wellhead Protection Area, Highly Vulnerable Aquifer, and Significant Groundwater Recharge Areas). Upon review, we can advise that the subject lands are within a vulnerable area. For policies, mapping and further information pertaining to drinking water source protection please refer to the approved Source Protection Plan at:

[http://maps.thamesriver.on.ca/GVH\\_252/?viewer=tsrassessmentreport](http://maps.thamesriver.on.ca/GVH_252/?viewer=tsrassessmentreport)

### **PEER REVIEW OF TECHNICAL REPORTS**

The UTRCA has completed a review of the *Geotechnical Assessment* prepared by LDS Consultants, dated December 14, 2018, and offer the following comments:

1. Page 1: During the demolition of the existing dwelling, the grade of the site shall not be altered as this may impact surface water runoff (causing localized flooding and ponding) and the erosion hazard. Please confirm that the demolition of the existing dwelling has not changed the site grade.
2. Page 1: Please consider the groundwater effects on the construction of the proposed basement and retaining wall to ensure they will not be affected by the groundwater fluctuation on the site.
3. Drawing 3: Please submit a detailed site plan with suitable scale and contour information identifying the location of the test pits.
4. Drawing 4: Please submit a detailed site plan identifying the location of Slope Profile A-A' alongside the toe of slope, top of slope, stable top of slope, and contour information.
5. Please undertake a stability analysis for the proposed retaining wall and stable slope considering a Factor of Safety (FOS) analysis which includes local soil properties, site



UTRCA Comments  
File No. Z-9007

conditions, ground water conditions, seepage, erosion, grading, surface runoff, and local geology, in support of the proposed retaining wall and slope stability on the site.

Section 4.1: The report discussed groundwater seepage and surficial erosion on the western slope. Please consider the existing and proposed conditions of the site/slope including groundwater and erosion in the FOS analysis.

6. Page 6, Section 4.1: Please submit the Slope Stability Rating Chart referenced in the report.
7. Please provide additional details relating to the groundwater seepage on the site and identify the location of the feature on a drawing.
8. How will surface water be safely discharged from the site and with no negative impacts to the surrounding properties?
9. Please consider the stability of the slope when undertaking site grading and preparation for development.
10. Page 16, Section 6.1: Contrary to the report, the site is located within a Significant Groundwater Recharge Area and is within a Highly Vulnerable Aquifer. Please revise accordingly.
11. Page 18, Section 6.4: The report has identified the presence of a seep on the slope and recommends an ecologist complete a review to determine significance. Please confirm if this has been completed and provide appropriate information to the UTRCA.

**RECOMMENDATION**

As indicated, the subject lands are regulated by the UTRCA. Please address the comments provided herein prior to the UTRCA providing sign-off on this application. In addition, a Section 28 Permit will be required. Please contact Brent Verscheure, UTRCA Land Use Regulations Officer, for information relating to the Section 28 permit requirements.

**FEES**

Consistent with UTRCA Board of Directors approved policy, Authority Staff are authorized to collect fees for the review of Planning Act applications and for the peer review of technical reports. Our fee for the review of the Zoning By-law Amendment application is \$275.00 and for the peer review of the Geotechnical Assessment is \$1050.00, totaling \$1325.00. This amount will be invoiced to the applicant under separate cover.

Thank you for the opportunity to comment. If you have any questions, please contact the undersigned at extension 430.

Yours truly,  
UPPER THAMES RIVER CONSERVATION AUTHORITY



Stefanie Pratt  
Land Use Planner  
SP/sp

Enclosure: Regulations Mapping (please print on legal size paper for accurate scales)

c.c.: Brent Verscheure, UTRCA Land Use Regulations Officer  
Steven Underhill, Underhill Holdings London Ltd.  
Casey Kulchycki, Zelinka Priamo Ltd. Planner

## Appendix B – Policy Context

The following policy and regulatory documents were considered in their entirety as part of the evaluation of this requested land use change. The most relevant policies, by-laws, and legislation are identified as follows:

The following policy and regulatory documents were considered in their entirety as part of the evaluation of this proposal. The most relevant policies, by-laws, and legislation are identified as follows:

### **Provincial Policy Statement, 2014**

The proposal must be consistent with the Provincial Policy Statement (PPS) policies and objectives aimed at:

1. Building Strong Healthy Communities;
2. Wise Use and Management of Resources; and,
3. Protecting Public Health and Safety.

The policies of the PPS promote healthy, liveable and safe communities by encouraging efficient development and land use patterns which sustain the financial well-being of the municipality, accommodating an appropriate range and mix of land uses and promoting cost-effective development standards to minimize land consumption and servicing costs. However, intensification of Low Density Residential dwellings in the proximity of the University of Western Ontario have resulted in significant costs being borne by the Municipality. The Municipality allocates resources toward pro-active By-law Enforcement patrols in these neighbourhoods, there are increased demands for garbage removal and the London Police Services undertakes Project LEARN twice a year in the near-campus neighbourhoods - which is the most expensive initiative in the London Police budget. These initiatives are a response to the increasing pressures felt through attempts to maximize the intensity of Low Density Residential forms of development in the area. Applications - such as this requested amendment - to intensify the subject site do not sustain the financial well-being of the Municipality.

The policies of the PPS require municipalities to “*identify and promote*” opportunities for intensification and redevelopment, taking into account existing building stock or areas and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs. It is important to note that this policy allows municipalities to use their own discretion to “*identify and promote*” the areas where intensification is to be directed and should not be interpreted as a requirement for municipalities to approve *all* intensification proposals.

The PPS requires that municipalities promote appropriate development standards which facilitate intensification, redevelopment, and compact form while maintaining appropriate levels of public health and safety. The Official Plan fulfills this requirement through its intensification policies which outline development standards to facilitate appropriate intensification, redevelopment and compact form by establishing criteria which ensure that the form, intensity, and character of proposals are compatible with the surrounding established neighbourhood (see The London Plan and Official Plan Policies sections below).

### **The London Plan**

The Our Strategy, Our City, City Building and Design, Rapid Transit Corridor Place Type, and Our Tools policies in the London Plan have been reviewed and consideration given to how the proposed Zoning By-law Amendment contributes to achieving those policy objectives, including the following specific policies:

59\_ Direction #5 Build a mixed-use compact city

1. Implement a city structure plan that focuses high-intensity, mixed-use development to strategic locations - along rapid transit corridors and within the Primary Transit Area.

62\_ Direction #8 Make wise planning decision

3. Think “big picture” and long-term when making planning decisions – consider the implications of a short-term and/ or site-specific planning decision within the context of this broader view.

9. Ensure new development is a good fit within the context of an existing neighbourhood.

\* 83\_ As directed by the policies of this Plan, intensification will be permitted only in appropriate locations and in a way that is sensitive to existing neighbourhoods and represents a good fit. Policies within the City Building and Urban Place Type chapters of this Plan, together with the policies in the Our Tools part of this Plan dealing with planning and development applications, will provide more detailed policy guidance for appropriate forms of intensification. A guideline document may be prepared to provide further detailed direction to ensure appropriate forms of intensification.

193\_ In all of the planning and development we do and the initiatives we take as a municipality, we will design for and foster:

- A well-designed built form throughout the city.
- Development that is designed to be a good fit and compatible within its context.

284\_ All planning and development proposals will be required to demonstrate how the proposed building is designed to support the planned vision of the place type and establishes character and a sense of place for the surrounding area. This will include matters such as scale, massing, materials, relationship to adjacent buildings, heritage impact and other such form-related considerations. The Our Tools chapter and the Residential Intensification policies in the Neighbourhoods Place Type chapter of this Plan provide further guidance for such proposals.

826\_ Our rapid transit corridors will be vibrant, mixed-use, mid-rise communities that border the length of our rapid transit services. Not all the segments of our corridors will be the same in character, use and intensity. Some segments will be primarily residential in nature, allowing only for small-scale commercial uses. In other segments, where large amounts of commercial floor space already exist, opportunities will be made for new stand-alone commercial uses while opening new opportunities for mixed-use development.

\* 827\_ Located in the Primary Transit Area and also along rapid transit routes, the Rapid Transit Corridors will be some of the most highly-connected neighbourhoods in our city. They will be linked to the Downtown and to the Transit Villages. Most of these corridors will be fundamentally walkable streetscapes, with abundant trees, widened sidewalks, and development that is pedestrian- and transit-oriented. Those parts of the Rapid Transit Corridors that are in close proximity to transit stations may allow for a greater intensity and height of development to support transit usage and provide convenient transportation for larger numbers of residents.

\* 837\_ The following uses may be permitted within the Rapid Transit Corridor and Urban Corridor Place Types, unless otherwise identified by the Specific-Segment policies in this chapter:

- A range of residential, retail, service, office, cultural, recreational, and institutional uses may be permitted within the Corridor Place Type.
- Mixed-use buildings will be encouraged.
- Large floor plate, single use buildings will be discouraged in Corridors.

\* 840\_ The following intensity policies apply within the Rapid Transit and Urban Corridor Place Types unless otherwise identified:

- Development within Corridors will be sensitive to adjacent land uses and employ such methods as transitioning building heights or providing sufficient buffers to ensure compatibility.
- Commercial buildings should not exceed 6,000m<sup>2</sup> in size within Corridors.
- Lot assembly is encouraged within the Corridor Place Types to create comprehensive developments that reduce vehicular accesses to the street and to allow for coordinated parking facilities.
- Lots will be of sufficient size and configuration to accommodate the proposed development and to help mitigate planning impacts on adjacent uses

\* 841\_ The following form policies apply within the Rapid Transit and Urban Corridor Place Types:

- Planning and development applications will be discouraged if they result in the creation of one or more isolated remnant lots that cannot be reasonably developed or assembled with other parcels in the Place Type to develop in accordance with the long-term vision for the Corridor.

\* 965\_ The following planning goals will be pursued in Near-Campus Neighbourhoods in an effort to support the Vision for Near-Campus Neighbourhoods. All planning and development applications will be reviewed to evaluate the degree to which they meet these goals:

- Plan for residential intensification in a proactive, coordinated and comprehensive fashion, utilizing secondary plans and master plans where appropriate.
- Identify strategic locations where residential intensification is appropriate within Near-Campus Neighbourhoods and zone these opportunities accordingly; use strong transit connections to link these residential intensification opportunities to campuses.
- Do not allow for incremental changes in use, density, intensity, and lot size that zoning amendments, minor variances and consents to sever are cumulatively leading to undesirable changes in the character and amenity of streetscapes and neighbourhoods.
- Encourage appropriate forms of intensification that support the vision for Near-Campus Neighbourhoods and discourage forms of intensification that may undermine the long-term vision for Near-Campus Neighbourhoods.
- Encourage a balanced mix of residential structure types at the appropriate locations while preserving stable residential areas.
- Encourage residential intensification in mid-rise and high-rise forms of development and discourage a concentration of residential intensification and residential intensity in low-rise forms of housing.
- Direct residential intensification to significant transportation nodes and corridors and away from the interior of neighbourhoods.
- Utilize zoning and other planning tools to allow for residential intensification and residential intensity which is appropriate in form, size, scale, mass, density, and intensity.
- Ensure intensification is located and designed to respect the residential amenity of nearby properties.

The City of London Official Plan OPA 88.

Residential Intensification is a means of providing opportunities for the efficient use of land and encouraging compact urban form. Residential Intensification may be permitted in the Low Density Residential designation through an amendment to the Zoning By-law, subject to the following policies and the Planning Impact Analysis policies under Section 3.7. Where the subject lands are within a specific residential area identified under policy 3.5, the application of the following residential intensification policies will supplement those specific policies, but will not supercede them. Residential Intensification projects shall use innovative and creative urban design techniques to ensure that character and compatibility with the surrounding neighbourhood are maintained as outlined in policy

3.2.3.3. and 3.2.3.4. (Subsections 3.2.3., 3.2.4. and 3.2.5. deleted and 3.2.3. added by OPA 438 Dec. 17/09) 3.2.3.1. Definition Residential Intensification refers to the development of a property, site or area at a higher density than currently exists on the site through: i) redevelopment, including the redevelopment of brownfield sites; ii) the development of vacant and/or underutilized lots within previously developed areas; iii) infill development, including lot creation; iv) the conversion or expansion of existing industrial, commercial and institutional buildings for residential use; and, v) the conversion or expansion of existing residential buildings to create new residential units or accommodation.

#### NCNS

3.5.19.4 Land Use Planning Goals for Near Campus Neighbourhoods the following land use planning and urban design goals will be pursued in Near Campus Neighbourhoods in an effort to support the vision expressed in Policy 3.5.19.3. All planning and site plan applications will be reviewed to evaluate the degree to which they meet these goals: i) Encourage appropriate intensification (as characterized in Policy 3.5.19.5) that support the vision for near-campus neighbourhoods and discourage inappropriate forms of intensification that may undermine the long-term stability and established vision for Near-Campus Neighbourhoods; ii) In pursuit of balanced neighbourhoods, recognize areas that have already absorbed significant amounts of Residential Intensification and Residential Intensity and direct additional proposals to the preferred locations and in the preferred forms; iii) Encourage a balanced mix of residential structure types at the appropriate locations while preserving stable homogenous areas; iv) Direct Residential Intensification to higher density forms of housing, including mid-rise and high-rise apartment buildings and discourage a concentration of Residential Intensification and Residential Intensity in low density forms of housing; v) Direct Residential Intensification to significant transportation nodes and corridors and away from the interior of low density residential neighbourhoods; vi) Utilize a variety of planning implementation tools to allow for Residential Intensification and Residential Intensity which is appropriate in form, size, scale, mass, density, and/or intensity; vii) Identify where incremental changes in use, density, intensity, and lot size, as a result of zoning amendments, minor variances and consents to sever are collectively leading to undesirable changes in the character and amenity of streetscapes and neighbourhoods and avoid the continuation of such trends; viii) Identify strategic locations where Residential Intensification is appropriate and zone for these opportunities accordingly and utilize strong transit connections to link these Residential Intensification opportunities to campuses; ix) Plan for Residential Intensification in a proactive, coordinated and comprehensive fashion, utilizing area plans, master plans, and precinct plans; x) Ensure that Residential Intensification projects incorporate urban design qualities that enhance streetscapes, complement adjacent properties, and contribute to the functional and aesthetic quality of the neighbourhood; xi) Preserve heritage resources which contribute to the identity of streetscapes and neighbourhoods; xii) Provide for affordable housing opportunities and appropriate locations. xiii) Ensure that intensification can provide for reasonable uses and activities, while not interfering with the reasonable quiet enjoyment of other nearby properties. (OPA 644)

3.5.19.5 Encourage Appropriate Intensification within Near-Campus Neighbourhoods it is a goal of this Plan to encourage appropriate forms of intensification. Planning applications, including minor variances, consents to sever, Official Plan amendments, Zoning By-law amendments, site plan approval, subdivisions, condominiums, area plans, secondary plans, or precinct plans which represent appropriate intensification will be encouraged. For the purposes of these policies, appropriate intensification will be characterized as those which are not comprised of one or more of the following attributes: i) Developments within low density residential neighbourhoods that have already absorbed significant amounts of Residential Intensification and/or Residential Intensity and are experiencing cumulative impacts that undermine the vision for Near-Campus Neighbourhoods; ii) Developments proposed along streetscapes and within neighbourhoods that are becoming unsustainable due to a lack of balance in the mix of short- and long-term residents; iii) Residential Intensity that is too great for the structure type that is proposed; iv) Inadequately sized lots that do not reasonably accommodate the density and intensity of the proposed use; v) Proposed lots and buildings requiring

multiple variances that, cumulatively, are not in keeping with the spirit and intent of the zoning that has been applied; vi) A lack of on-site amenity area; vii) Inadequate parking areas to accommodate expected level of Residential Intensity; viii) Excessive proportions of the site devoted to parking areas and driveways; ix) Built forms or building additions which are not consistent in scale and character with the neighbourhood, streetscape and surrounding buildings; x) Developments which continue an ad-hoc and incremental trend towards Residential Intensification within a given street, block, or neighbourhood, rather than a proactive, coordinated, and planned approach toward Residential Intensification.

### 3.7 Planning Impact Analysis

A Planning Impact Analysis is used to evaluate applications for an Official Plan amendment and/or zone change, to determine the appropriateness of a proposed change in land use, and to identify ways of reducing any adverse impacts on surrounding land uses. The criteria to be evaluated include:

- *Compatibility of proposed uses with surrounding land uses, and the likely impact of the proposed development on present and future land uses in the area*

There is a concern that this ad-hoc development on a site that is not unique within its context may encourage other landowners to make future applications for similar types of intensification where the City would favour a coordinated and comprehensive plan to assess the area's potential to accommodate a higher intensity of use(s).

- *The size and shape of the parcel of land on which a proposal is to be located, and the ability of the site to accommodate the intensity of the proposed use*

The required 24 metre road allowance and the resolution of the concerns raised by the UTRCA regarding the slope at the rear of the property does not allow for the proposed fourplex to be sited on the lot. The proposed fourplex is too intense for the portion of land that is developable on the site.

- *The supply of vacant land or vacant buildings in the area which is designated and/or zoned for the proposed uses*

There is no designated and/or zoned land that would accommodate the proposed fourplex use in the immediate area. However, lands in close proximity have been designated and zoned to accommodate intensification and special policies have been applied in surrounding neighbourhoods which direct intensification to 'appropriate' areas that are comprehensively planned (See Essex, St. BIGS, George/Grosvenor, North London/Broughdale, etc.).

- *The potential traffic generated by the proposed change, considering the most intense land uses that could be permitted by such a change, and the likely impact of this additional traffic on City streets, pedestrian and vehicular safety, and on surrounding properties*

The requested amendment is not anticipated to create any additional impacts on City streets, pedestrian and vehicular safety or on surrounding properties given the existing volume of traffic on Oxford Street West.

- *Impacts of the proposed change on the transportation system including transit*

There are no impacts anticipated on the transportation system.

- *the height, location and spacing of any buildings in the proposed development, and any potential impacts on surrounding land uses*

The potential impacts are related to intensity, privacy and the lack of a coordinated plan for area intensification. These concerns have been expressed in the prior analysis section.

The Zoning By-law is a comprehensive document used to implement the policies of the Official Plan by regulating the use of land, the intensity of the permitted use, and the built form. This is achieved by applying various zones to all lands within the City of London which identify a list of permitted uses and regulations that frame the context within which development can occur. Collectively, the permitted uses and regulations assess the ability of a site to accommodate a development proposal. It is important to note that all three criteria of use, intensity, and form must be considered and deemed to be appropriate prior to the approval of any development proposal.

As it relates to the subject site, the only use permitted under the current zone is one single detached dwelling, semi detached, duplex or converted dwelling (2 units max) per lot. This address was being used as a single detached dwelling, operating without Residential Rental Unit Licenses.

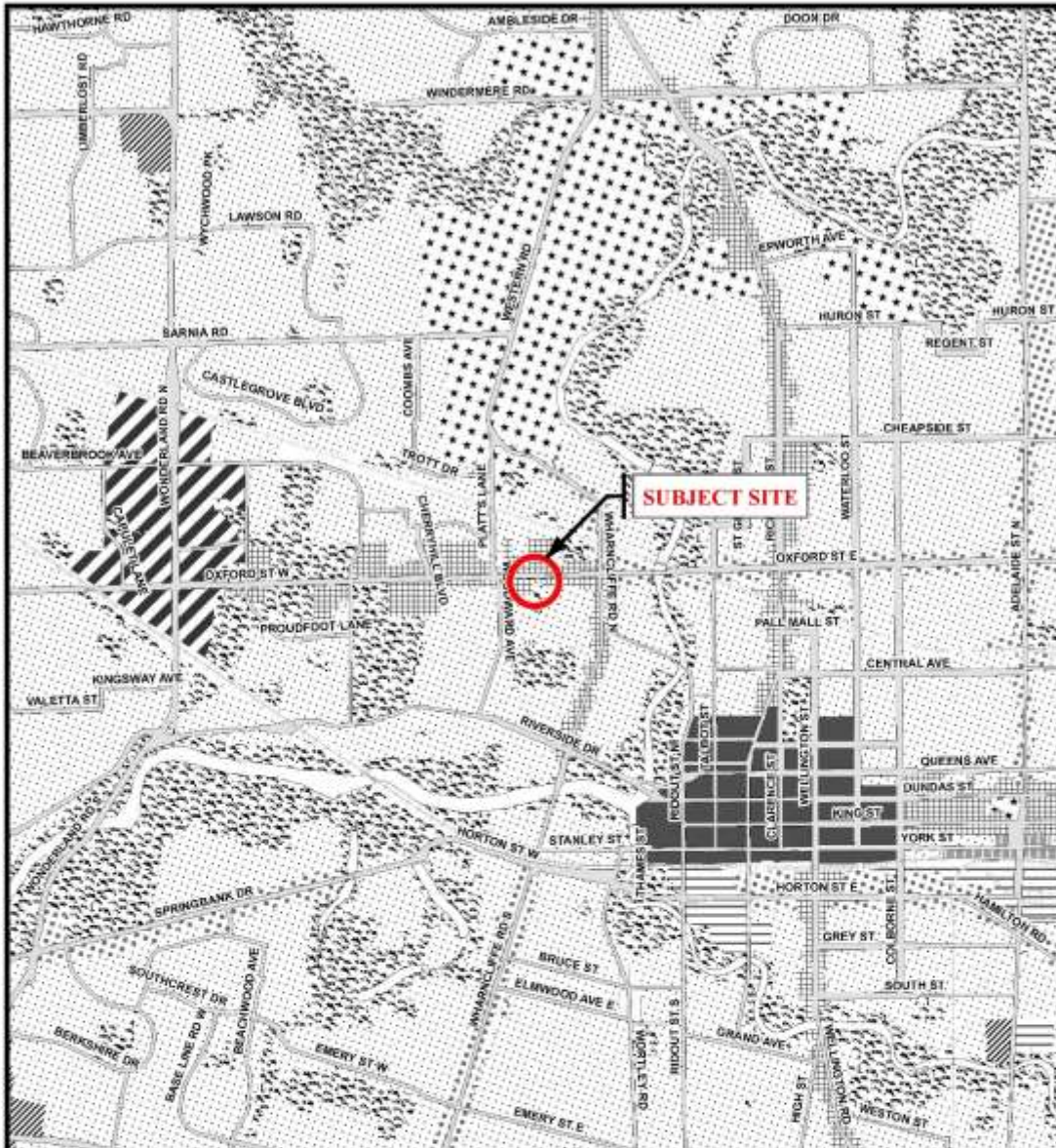
The applicant is seeking an amendment to the Z.-1 Zoning By-law to a Residential R3 (R3-2) Zone. The R3 Zone provides for and regulates low to low-medium density residential development permitting single detached dwellings, semi-detached dwellings, duplex dwellings, triplex dwellings, fourplex dwellings; and allows for the conversion of an existing dwelling. The R3-2 Zone variation is intended to be used throughout the City for most low to medium-low residential developments.

Although the subject site meets most of the minimum requirements of the Zoning By-law regarding the requested Residential R3 (R3-2) zone, the issue is the appropriateness of a site-specific Zoning By-law amendment at this location.

# Appendix C – Relevant Background

## Additional Maps

### London Plan Designation



**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              |   |

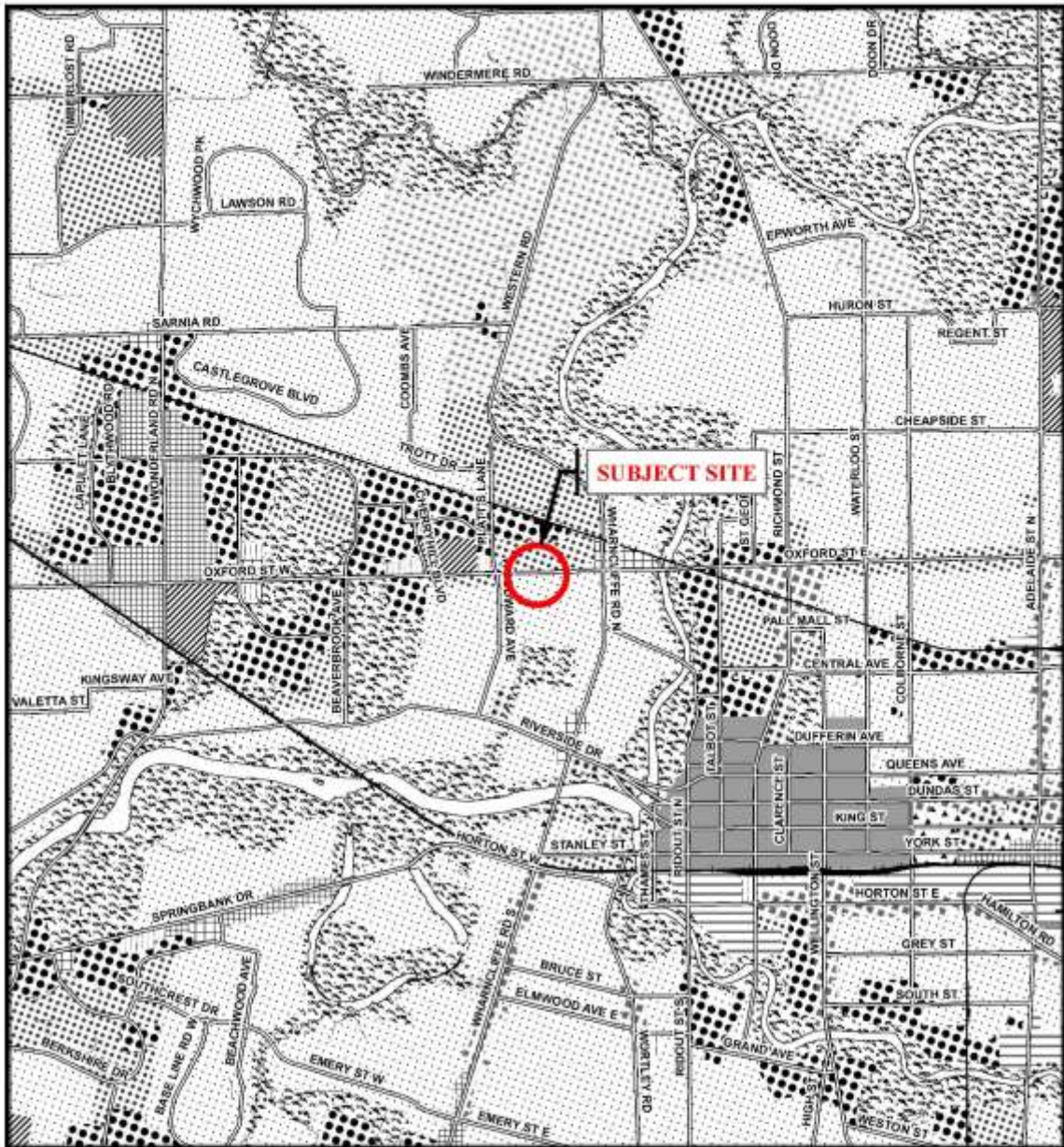
This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

At the time of the printing of this map, the Rapid Transit EA is in progress. This map shows the Rapid Transit Corridors and Urban Corridors to recognize potential alignments. These Place Types will be modified to align with the results of the EA process for the final version of The London Plan.

|   |                                     |   |
|---|-------------------------------------|---|
| <p><b>CITY OF LONDON</b><br/>Planning Services /<br/>Development Services</p> <p><b>LONDON PLAN MAP 1</b><br/><b>- PLACE TYPES -</b></p> <p><small>PREPARED BY: Planning Services</small></p> | <p>Scale 1:30,000</p> <p>Meters</p> | <p><b>File Number:</b> Z-9007</p> <p><b>Planner:</b> CS</p> <p><b>Technician:</b> RC</p> <p><b>Date:</b> March 26, 2019</p> |
|---|-------------------------------------|---|



**Official Plan Designation**



| Legend  |  |                         |
|---|--|-------------------------|
| Downtown                                      | Multi-Family, Medium Density Residential | Office Business Park    |
| Wonderland Road Community Enterprise Corridor | Low Density Residential                  | General Industrial      |
| Enclosed Regional Commercial Node             | Office Area                              | Light Industrial        |
| New Format Regional Commercial Node           | Office/Residential                       | Commercial Industrial   |
| Community Commercial Node                     | Regional Facility                        | Transitional Industrial |
| Neighbourhood Commercial Node                 | Community Facility                       | Rural Settlement        |
| Main Street Commercial Corridor               | Open Space                               | Environmental Review    |
| Auto-Oriented Commercial Corridor             | Urban Reserve - Community Growth         | Agriculture             |
| Multi-Family, High Density Residential        | Urban Reserve - Industrial Growth        | Urban Growth Boundary   |

|   |                                     |                            |
|---|-------------------------------------|----------------------------|
| <p><b>CITY OF LONDON</b><br/>Planning Services /<br/>Development Services<br/>OFFICIAL PLAN SCHEDULE A<br/>- LAND USE -</p> <p>PREPARED BY: Graphics and Information Services</p> | <p>Scale 1:30,000</p> <p>Meters</p> | <p>FILE NUMBER: Z-9007</p> |
|   |                                     | <p>PLANNER: CB</p>         |
|   |                                     | <p>TECHNICIAN: RC</p>      |
|   |                                     | <p>DATE: 2019/03/26</p>    |

**Existing Zoning**



**COUNCIL APPROVED ZONING FOR THE SUBJECT SITE:**

1) **LEGEND FOR ZONING BY-LAW Z-1**

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>R1 - SINGLE DETACHED DWELLINGS</li> <li>R2 - SINGLE AND TWO UNIT DWELLINGS</li> <li>R3 - SINGLE TO FOUR UNIT DWELLINGS</li> <li>R4 - STREET TOWNHOUSE</li> <li>R5 - CLUSTER TOWNHOUSE</li> <li>R6 - CLUSTER HOUSING ALL FORMS</li> <li>R7 - SENIOR'S HOUSING</li> <li>R8 - MEDIUM DENSITY/LOW RISE APTS.</li> <li>R9 - MEDIUM TO HIGH DENSITY APTS.</li> <li>R10 - HIGH DENSITY APARTMENTS</li> <li>R11 - LODGING HOUSE</li> <br/> <li>DA - DOWNTOWN AREA</li> <li>RSA - REGIONAL SHOPPING AREA</li> <li>CSA - COMMUNITY SHOPPING AREA</li> <li>NSA - NEIGHBOURHOOD SHOPPING AREA</li> <li>BDC - BUSINESS DISTRICT COMMERCIAL</li> <li>AC - ARTERIAL COMMERCIAL</li> <li>HS - HIGHWAY SERVICE COMMERCIAL</li> <li>RSC - RESTRICTED SERVICE COMMERCIAL</li> <li>CC - CONVENIENCE COMMERCIAL</li> <li>SS - AUTOMOBILE SERVICE STATION</li> <li>ASA - ASSOCIATED SHOPPING AREA COMMERCIAL</li> <br/> <li>OR - OFFICE/RESIDENTIAL</li> <li>OC - OFFICE CONVERSION</li> <li>RO - RESTRICTED OFFICE</li> <li>OF - OFFICE</li> </ul> | <ul style="list-style-type: none"> <li>RF - REGIONAL FACILITY</li> <li>CF - COMMUNITY FACILITY</li> <li>NF - NEIGHBOURHOOD FACILITY</li> <li>HER - HERITAGE</li> <li>DC - DAY CARE</li> <br/> <li>OS - OPEN SPACE</li> <li>CR - COMMERCIAL RECREATION</li> <li>ER - ENVIRONMENTAL REVIEW</li> <br/> <li>OB - OFFICE BUSINESS PARK</li> <li>LI - LIGHT INDUSTRIAL</li> <li>GI - GENERAL INDUSTRIAL</li> <li>HI - HEAVY INDUSTRIAL</li> <li>EX - RESOURCE EXTRACTIVE</li> <li>UR - URBAN RESERVE</li> <br/> <li>AG - AGRICULTURAL</li> <li>AGC - AGRICULTURAL COMMERCIAL</li> <li>RRC - RURAL SETTLEMENT COMMERCIAL</li> <li>TGS - TEMPORARY GARDEN SUITE</li> <li>RT - RAIL TRANSPORTATION</li> <br/> <li>"H" - HOLDING SYMBOL</li> <li>"D" - DENSITY SYMBOL</li> <li>"H" - HEIGHT SYMBOL</li> <li>"B" - BONUS SYMBOL</li> <li>"T" - TEMPORARY USE SYMBOL</li> </ul> |
|--|---|

**CITY OF LONDON**

PLANNING SERVICES / DEVELOPMENT SERVICES

**ZONING  
BY-LAW NO. Z-1  
SCHEDULE A**



THIS MAP IS AN UNOFFICIAL EXTRACT FROM THE ZONING BY-LAW WITH ADDED NOTATIONS

FILE NO:  
Z-9007 CS

MAP PREPARED:  
2019/03/26 CS

1:1,250  
0 5 10 20 30 40  
Meters