

## Report to Planning and Environment Committee

**To:** Chair and Members  
Planning & Environment Committee  
**From:** George Kotsifas P. Eng.,  
Managing Director, Development & Compliance Services and  
Chief Building Official  
**Subject:** Drewlo Holdings Inc.  
475 and 480 Edgevalley Road  
**Public Participation Meeting on: September 9, 2019**

## Recommendation

That, on the recommendation of the Director, Development Services, the proposed by-law attached hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting to be held on September 17, 2019 to amend Zoning By-law No. Z.-1, in conformity with the Official Plan to:

- (a) change the zoning of the property known as 480 Edgevalley Road **FROM** a Holding Residential R5/R6 (h\*h-54\*R5-7/R6-5) Zone, **TO** a Residential R8 Special Provision (R8-4( )\*H15) Zone to permit apartment buildings, handicapped person's apartment buildings, lodging house class 2, stacked townhousing, senior citizen apartment buildings, emergency care establishments, and continuum-of-care facilities at a maximum height of 15 metres and a maximum density of 75 units per hectare, with a special provision for reduced front, exterior side yard and rear yard depths; and
- (b) change the zoning of the property known as 475 Edgevalley Road **FROM** a Holding Residential R5/R6 (h\*h-54\*R5-7/R6-5) Zone to a Residential R8 Special Provision Bonus (R8-4( )\*H16\*B( )) Zone to permit apartment buildings, handicapped person's apartment buildings, lodging house class 2, stacked townhousing, senior citizen apartment buildings, emergency care establishments, and continuum-of-care facilities at a maximum height of 16 metres and a maximum density of 75 units per hectare, with a special provision for reduced front, exterior side yard and rear yard depths;

**IT BEING NOTED THAT** the proposed Bonus Zone will be enabled through one or more agreements to facilitate the development of three (3) low-rise apartment buildings, with a maximum of four (4) storeys (Building A = 16m), five (5) storeys (Building B = 18m) and six (6) storeys (Building C = 22m), a total of 147 dwelling units (Building A = 39 dwelling units; Building B = 49 dwelling units; Building C = 59 dwelling units), and a density of 100 units per hectare, and,

**IT BEING FURTHER NOTED THAT** the proposed development will provide for four (4) affordable rental housing units, established by agreement at 85% of the CMHC average market rent for a period of 15 years with an agreement being entered into with The Corporation of the City of London, to secure the above-noted affordable housing units for the 15 year term; and,

**IT BEING FURTHER NOTED THAT** the following Site Plan Matters pertaining to 475 and 480 Edgevalley Road have been raised during the public participation process:

- i) additional landscaping and drive aisle on the west property line of 480 Edgevalley Road;
- ii) additional landscaping throughout the sites; and
- iii) robust fencing.

## Executive Summary

### Summary of Request

The requested amendment is to rezone the subject sites to allow for low rise apartment buildings through an R8-4 Zone with special provisions, and add a site-specific Bonus Zone to 475 Edgevalley Road to permit three apartment buildings, ranging from 4-6 storeys in height.

### Purpose and the Effect of Recommended Action

The purpose and effect of recommended amendment is to allow two apartment buildings, each 4 storeys (15m) in height, for a total of 78 residential units at 480 Edgevalley Road, and three apartment buildings, ranging from 4-6 storeys in height (up to 22m), for a total of 147 residential units through a Bonus Zone at 475 Edgevalley Road.

### Rationale of Recommended Action

1. The recommended amendment is consistent with the *Provincial Policy Statement (PPS), 2014*, as it promotes efficient development and land use patterns which sustain the financial well-being of the municipality; accommodate an appropriate range and mix of land uses; and promote cost-effective development standards to minimize land consumption and servicing costs.
2. The recommended amendment conforms to the in-force policies of The London Plan, including but not limited to the Neighbourhoods Place Type, Our City, Our Strategy, and all other applicable London Plan policies.
3. The recommended amendment permits a form and intensity of medium density residential development that conforms to the in-force policies of the (1989) Official Plan, including but not limited to the Multi-Family, Medium Density Residential designation, and the Bonus Zoning policies.
4. The recommended amendment will allow for an increase to height and density through a Bonus Zone which requires that the ultimate form of development be consistent with the site plan and elevations appended to the amending by-law. The recommended Bonus Zone provides for an increased density and height in return for a series of bonusable features, matters and contributions that benefit the public in accordance with Section 19.4.4 of the (1989) Official Plan.
5. The recommended Zoning By-law amendment allows development that is consistent with the land use concepts and guidelines in the Kilally North Area Plan, which encourage medium density housing forms that are designed without the need for noise attenuation walls in this location and recognizes transition with existing residential development;
6. The proposed use for the subject lands contributes to the range and mix of housing options in the area. The proposed use represents an efficient development and use of land.
7. The subject lands are of a size and shape suitable to accommodate the proposal. The recommended Zoning By-law amendment provides appropriate regulations to control the use and intensity of the building and ensure a well-designed development with appropriate mitigation measures.

## Analysis

### 1.0 Site at a Glance

#### 1.1 Property Description

The subject lands, municipally known as 475 and 480 Edgevalley Road, are located on the north side of Kilally Road, east and west of Edgevalley Road and south of Agathos Street. These sites are a part of a larger plan of subdivision, known as the Edgevalley

Subdivision, bounded by the Thames River to the north, Highbury Avenue to the west, and Kilally Road to the south. Kilally Road is an arterial road in the (1989) Official Plan, and is a \*Civic Boulevard in The London Plan, while Edgevalley Road is a secondary collector in the (1989) Official Plan, and is a \*Neighbourhood Connector in The London Plan. Both sites have frontage on three roads. The lands are vacant. The area is comprised of mostly single detached dwellings to the west and south, and future single detached dwellings to the north. They are characterized as being relatively flat with elevations sloping upwards toward the easterly limits of 475 Edgevalley Road. There are no structures on the site. No vegetation exists on the site, with the exception of a small number of remnant hedgerows and shrubs.

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

- The London Plan Place Type – Neighbourhoods
- Official Plan Designation – Multi-Family, Medium Density Residential
- Existing Zoning – Holding Residential R5/R6 (h\*h-54\*R5-7/R6-5) Zone

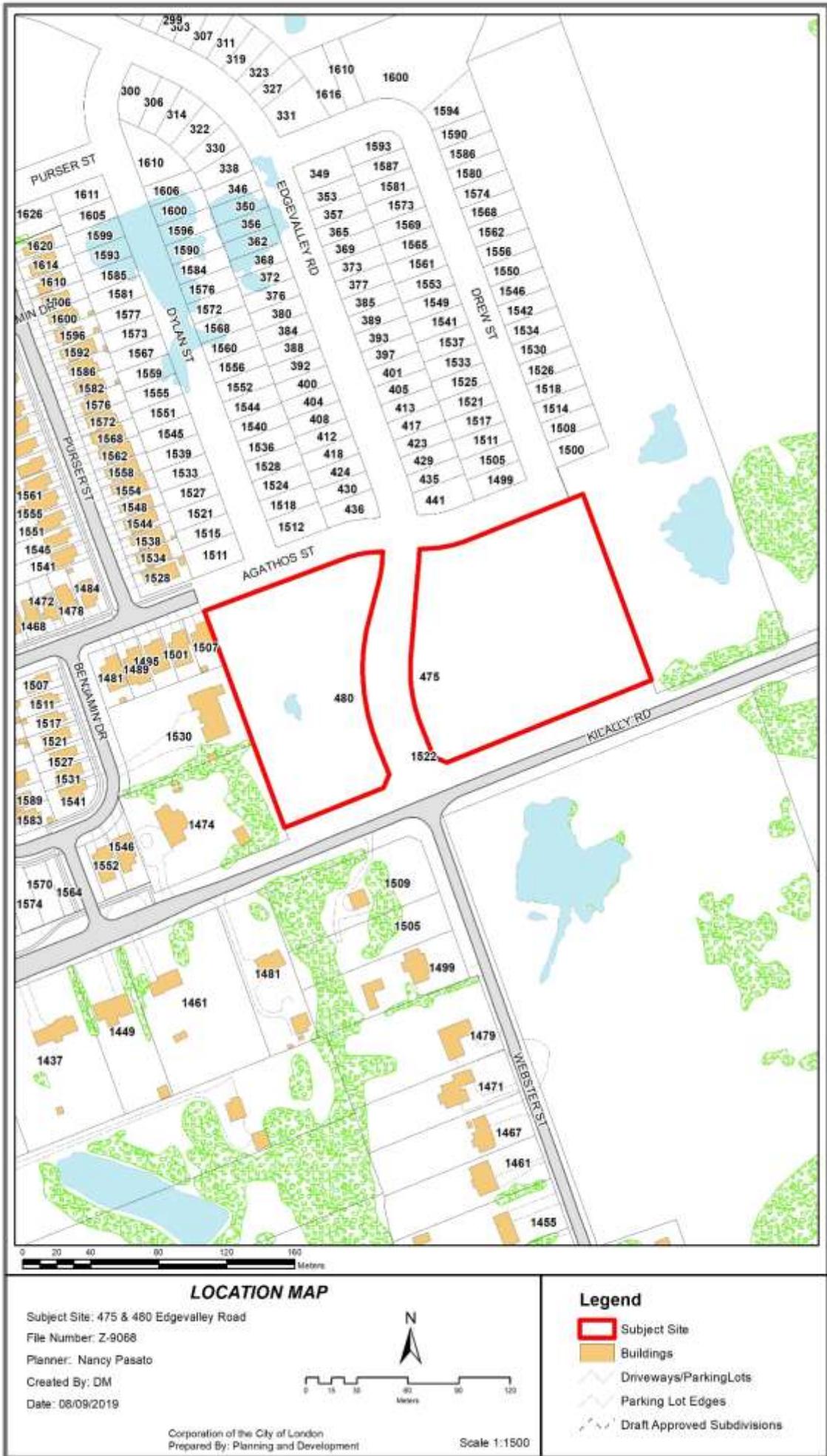
**1.3 Site Characteristics**

- Current Land Use – vacant
- Frontage on Kilally Road - 135.9m (445.9 feet)(475 Edgevalley Road); 52.73m (173.0 feet)(480 Edgevalley Road)
- Depth on Edgevalley Road – 135.98m (446.1 feet)(475 Edgevalley Road); 134.63m (441.7 feet)(480 Edgevalley Road)
- Area – 1.4 ha (3.5 ac)(475 Edgevalley Road); 1.1 ha (2.7 ac)(480 Edgevalley Road)
- Shape – irregular

**1.4 Surrounding Land Uses**

- North – vacant (proposed single detached residential)
- East – vacant
- South – vacant/single detached residential
- West – single detached residential

1.5 Location Map



## 2.0 Description of Proposal

### 2.1 Development Proposal

The proposed concept for the subject lands illustrates five (5) low-rise apartment buildings in total across two sites, ranging in height from four (4) to six (6) storeys.

At 475 Edgevalley Road (east side of Edgevalley), the proposed site plan includes three (3) low-rise apartment buildings, ranging in height from four (4) to six (6) storeys, with a total of 147 units; and incorporates the following elements, by way of the proposed Bonus Zone:

- Building A is four (4) storeys in height, providing 39 units;
- Building B is five (5) storeys in height, providing 49 units;
- Building C is six (6) storeys in height, providing 59 units;
- A total of 207 parking spaces have been provided; and,
- Vehicular access to the site is from Agathos Street.

At 480 Edgevalley Road (west side of Edgevalley), the proposed site plan includes two (2) low-rise apartment buildings, four (4) storeys in height, with a total of 78 units; and incorporates the following elements:

- Building A is four (4) storeys in height, providing 39 units;
- Building B is four (4) storeys in height, providing 39 units;
- A total of 106 parking spaces have been provided; and
- Vehicular access to the site is from Agathos Street.

The site plan, building elevations and renderings, incorporate the following elements:

- Buildings that form a continuous, enclosing street wall; creating a strong foundation for establishing a recognizable image and sense of place;
- Parking areas located internal to the site;
- Defined intersection (Kilally Road and Edgevalley Road) creating a gateway feature to the neighbourhood;
- Built form that is sensitive to adjacent uses; with the tallest buildings being located to the east, away from existing residences to the west;
- Direct, comfortable and safe connections from the building entrance to the public realm;
- Scale relationships that are comfortable for pedestrians;
- A diversity of unit types allowing for affordability and giving people the opportunity to remain in their neighbourhood as they age; and,
- Outdoor amenity space provided in the form of balconies and patios at grade-level.

A proposed key map, site plan and renderings are shown in Figure 2, 3 and 4.

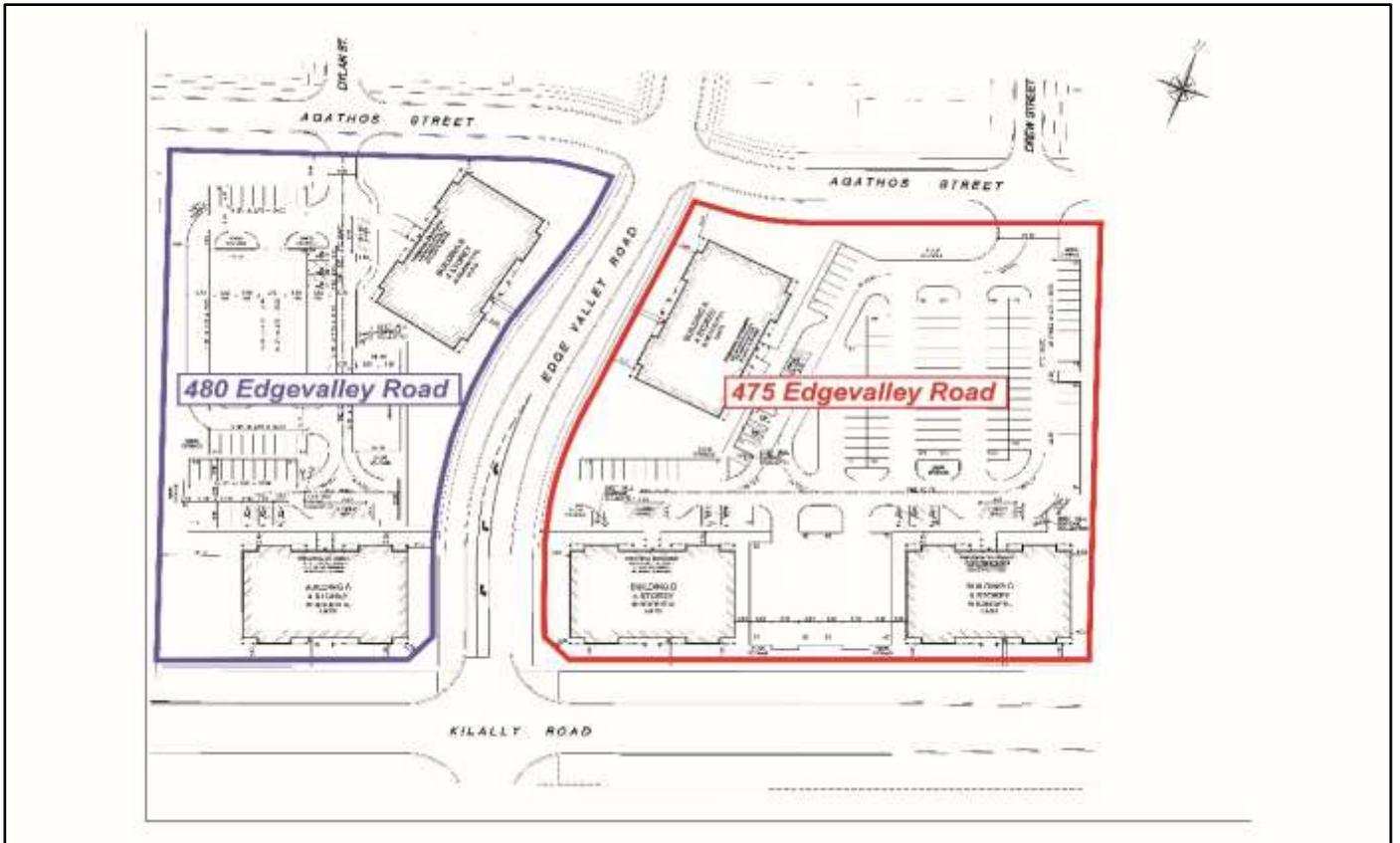


Figure 2 - Key Map 480 and 475 Edgevalley Road

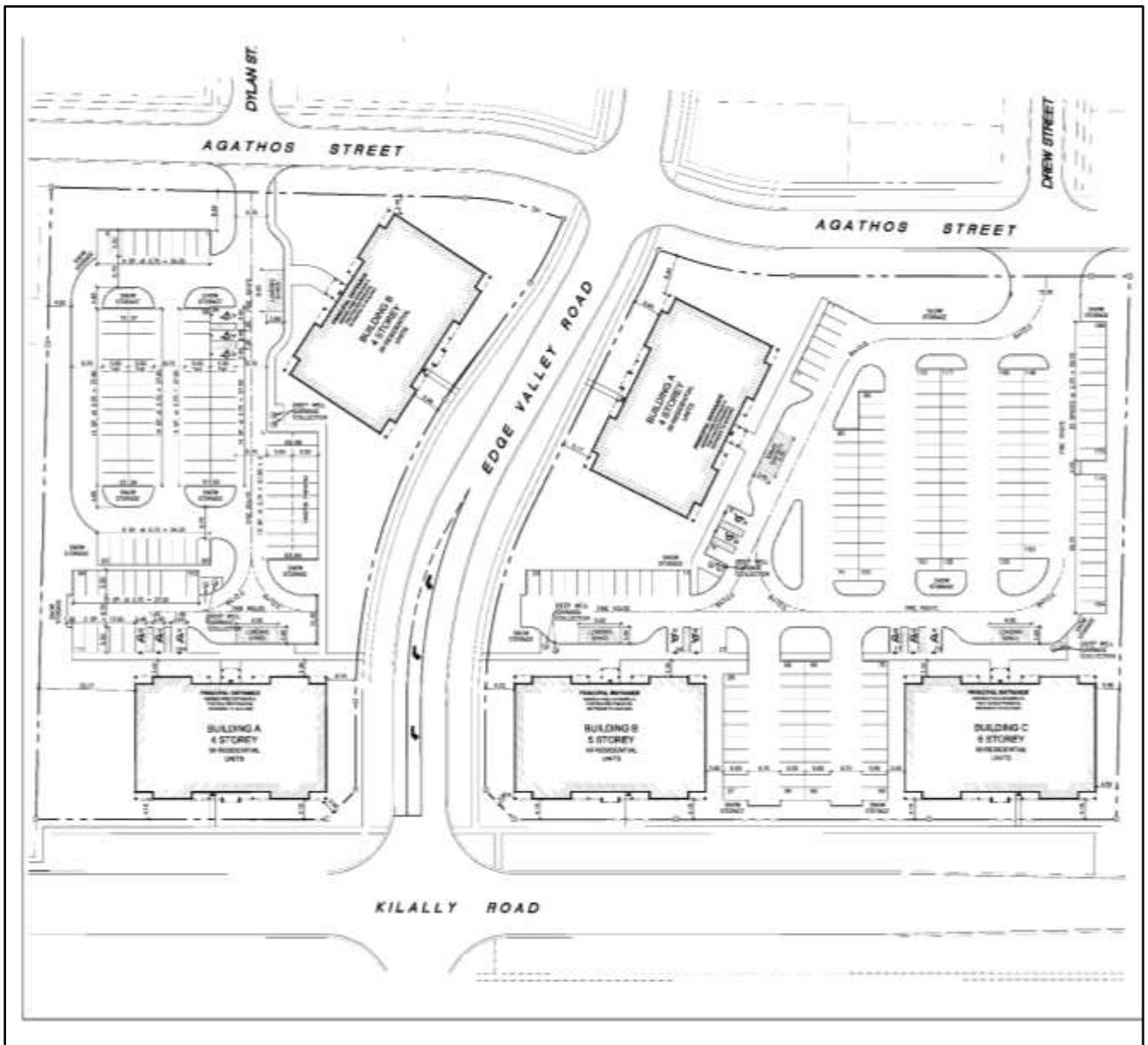


Figure 3 - Proposed Site Plan (revised as of August 16, 2019) for 475 and 480 Edgevalley Road



*Figure 4 - Rendering of 4 storey building - 475 and 480 Edgevalley Road*



*Figure 5 - Rendering of 5 storey building at 475 Edgevalley Road*



Figure 6 - Rendering of 6 storey building at 475 Edgevalley Road

## 2.2 Requested Amendment

The Applicant has requested a Zoning By-law amendment at 480 Edgevalley Road to apply a Residential R8 Special Provision (R8-4( )\*H15) Zone to permit apartment buildings, handicapped person's apartment buildings, lodging house class 2, stacked townhousing, senior citizen apartment buildings, emergency care establishments, and continuum-of-care facilities at a maximum height of 15 metres and a maximum density of 75 units, with a special provision for a reduced front and exterior side yard depth of 0 metres.

The Applicant has requested a Zoning By-law amendment at 475 Edgevalley Road to apply a Residential R8 Special Provision Bonus (R8-4( )\*H16\*B( )) Zone to permit apartment buildings, handicapped person's apartment buildings, lodging house class 2, stacked townhousing, senior citizen apartment buildings, emergency care establishments, and continuum-of-care facilities at a maximum height of 16 metres and a maximum density of 75 units, with a special provision for a reduced front and exterior side yard depth of 0 metres. The bonus zone (B-( )) would permit a maximum height of 6 storeys (or 21 metres) and a maximum residential density of 100 units per hectare in return for eligible facilities, services and matters outlined in Section 19.4.4 of the Official Plan and policies 1638-1655 of The London Plan.

## 3.0 Relevant Background

### 3.1 Planning History

The subject site is within the Kilally South Area Plan. In November of 1990, the Kilally Road Area Study was completed for lands east and west of Highbury Avenue North, south of the Thames River. The recommended land use designations, which resulted from the study, were applied to the lands east of Highbury Avenue North and west of Webster Street and its future northerly extension. In 2003, the Kilally South Area Plan Update was completed. This study addressed the deferred portion of lands east of Webster Street and recommended land use designations and provided direction for future growth in this area.

Drewlo Holdings Inc. submitted an application for draft plan of subdivision and zoning by-law amendment on March 31, 2005. The public meeting was held on February 27, 2006. Council resolved that the draft plan and concurrent zoning by-law amendment be approved on March 6, 2006. Draft approval was granted on March 22, 2006. A three year extension to the draft approval was granted by the Approval Authority on March 22, 2009.

On May 4, 2011, the applicant submitted a revised draft plan of subdivision consisting of 129 single detached lots, 5 medium density blocks, 1 high density block, 2 park blocks, all served by the extension of Edgevalley Road, Agathos Street and Purser Street and 2 new local streets. The public meeting was held on December 12, 2011. A three (3) year extension and approval of the revised draft plan with conditions was granted by the Approval Authority on February 10, 2012.

Since this time, several draft approval extensions have been granted by the Approval Authority and Council (August of 2015, January of 2017, and most recently, an emergency extension in July of 2018). Final Approval was granted on December 19, 2018 and the plan has been registered as 33M-757.

Most recently, a removal of holding provision (H-8892) application was approved by Planning and Environment Committee and Municipal Council in January of 2019. The application to remove the holding provisions permitted the development of the single detached lots within the plan of subdivision. This application removed the "h-100" holding provision from the subject sites (secondary access and water looping constructed).

### **3.2 Community Engagement (see more detail in Appendix B)**

There were 12 responses (both written and verbal) provided through the community consultation period. A summary of the comments include:

- Transition from low density to high density - too abrupt
- This development will not enhance the neighbourhood
- Property values will be affected
- Privacy concerns
- Traffic and impacts to safety, road capacity
- Crime as a result of new development
- Impact on adjacent homes from parking lot
- Possible student housing
- Issues related to affordable housing - crime, safety, privacy
- Noise
- Expectation of lower densities and housing form
- Increases in impermeable surface/SWM/flooding issues
- Lack of greenspace on plan/landscape buffer
- Parking should be underground
- Webster Street - improvements
- When will traffic lights be installed?
- Total population of development?
- Need overall road improvements i.e. reduce speeds on Highbury Avenue, left and right turn lanes of Kilally and Highbury and upgrades needed

A Community Information Meeting was held by the applicant on August 7, 2019, of which 45 people attended. A summary of comments include:

- Transition should be to three storeys on 480 Edgevalley, at existing density of 40 units per hectare
- Reduce parking/paved area on site
- Increase buffering and landscaping adjacent to existing homes/more greenspace on site
- Increase setbacks of buildings on the site/not adjacent to road
- Taller fencing with better materials adjacent to existing homes

- Existing homeowners have rights
- Impact on property values
- Privacy and safety concerns, especially related to low income development
- Traffic and impacts to safety, road capacity, noise
- Webster Street - concerns related to lack of sidewalks, lack of street lights, need traffic calming measures, and lack of municipal services
- When will traffic lights be installed?
- Speed limits should be reduced on Highbury Avenue

All public comments received through the public participation meeting, community meetings and other correspondence has been considered, addressed or incorporated where possible in the proposed development and detailed further through this report.

### **3.4 Policy Context (see more detail in Appendix C)**

The Kilally South Area Plan, completed in 2003, was used as a guideline document for future development, including the subject sites. Generally, these lands were designated as Multi-Family, Medium Density Residential, which permitted multi-family uses, noting that cluster townhouses would be the likely use on site. As noted, the Area Plan was a guideline document only, and as part of The London Plan, previous Area Plans will be phased out, and any relevant considerations will be incorporated into policy.

#### *Provincial Policy Statement, 2014*

The Provincial Policy Statement (PPS) 2014, provides policy direction on matters of provincial interest related to land use planning and development. The policies support efficient and resilient development patterns through a range of uses, and appropriate infill and intensification in settlement areas.

#### *The London Plan*

The subject site is located within the \*Neighbourhoods place type, along a \*Civic Boulevard (Kilally Road), a \*Neighbourhood Connector (Edgevalley Road) and a \*Neighbourhood Street (Agathos Street). The \*Neighbourhoods place type allows for a wide range of residential uses, including low rise apartments (up to four storeys), with the allowance for bonusing up to six storeys. The Neighbourhoods place type is intended to: create and enhance a strong neighbourhood character, sense of place and identity; provide a diversity and mix, and should avoid the broad segregation of different housing types, intensities, and forms; provide and integrate affordable housing into all neighbourhoods; support the development of residential facilities that meet the housing needs of persons requiring special care; provide for mixed-use and commercial uses at appropriate locations within neighbourhoods to meet the daily needs of neighbourhood residents; plan for live-work opportunities at appropriate locations; ensure street networks within neighbourhoods will be designed to be pedestrian, cycling and transit-oriented, giving first priority to these forms of mobility; provide for intensification will that respects existing community character and offers a level of certainty, while providing for strategic ways to accommodate development to improve our environment, support local businesses, enhance our physical and social health, and create dynamic, lively, and engaging places to live (\*918\_).

#### *(1989) Official Plan*

The subject site is designated Multi-Family, Medium Density Residential (MFMDR), which permits multiple-unit residential developments having a low-rise profile, and densities that exceed those found in Low Density Residential areas but do not approach the densities intended for the Multi-Family, High Density Residential designation. Residential uses that typically comprise medium density development include row houses, cluster houses, and low-rise apartment buildings. The scale of development shall be subject to height limitations in the Zoning By-law which are sensitive to the scale of development in the surrounding neighbourhood. Normally height limitations will not exceed four storeys, and density will not exceed an approximate net density of 75 units per hectare (30 units per acre), however, in some instances, height and density may be permitted to exceed these limits, such as through the bonusing provisions under

Section 19.4.4. of this Plan. All proposals shall be evaluated using the Planning Impact Analysis of the (1989) Official Plan.

## 4.0 Key Issues and Considerations

### 4.1 Use

#### *Provincial Policy Statement (PPS)*

The PPS promotes healthy, livable and safe communities by accommodating an appropriate range and mix of residential, employment, and other uses to meet long term needs (1.1.1 b) PPS). The proposal adds another housing form to the area which ensures a suitable mix of housing types. Densities and a mix of housing forms are also promoted where they are transit-supportive, where transit is planned, exists or may be developed (1.1.3.2.5). The current development proposal is located close to Highbury Avenue, which is serviced by existing transit, and is located on Kilally Road, which will likely become a future transit service.

#### *The London Plan*

The location of these sites, within the \*Neighbourhoods place type, allows for a wide range of residential uses, including low rise apartments (up to four storeys), with the allowance for bonusing up to six storeys. Low rise apartments are a permitted use within the Neighbourhoods Place Type, subject to criteria. As noted above, and throughout, the development proposal is consistent with the policies of the PPS. The proposal is consistent with the policies of The London Plan, by ensuring a mix of housing types within our neighbourhoods so they are complete and support aging in place (59\_5), building quality public spaces and pedestrian environments through linkages on street to the Thames Valley Parkway and transit (59\_7), and designing complete neighbourhoods with a diversity of housing choices, providing more affordable housing options, and by meeting the needs of people of all ages, incomes and abilities (61\_2). The City's strategy is to provide housing within the Urban Growth Boundary (\*72\_), located on important mobility corridors, such as Civic Boulevards (Kilally Road) and near existing and future transit corridor and important pathway connections (107\_), and with access to full services (172\_). City Building is achieved through this development application by providing for uses that contribute to a well-designed built form, is designed to be a good fit and compatible with adjacent development, provides for a mix of housing types to support ageing in place and affordability (\*193\_).

#### *(1989) Official Plan*

The Multi-Family, Medium Density Residential designation primarily permits multiple-attached dwellings, such as row houses or cluster houses, low-rise apartment buildings, rooming and boarding houses, emergency care facilities, converted dwellings, small-scale nursing homes, rest homes and homes for the aged (3.3.1). The Multi-Family, Medium Density Residential designation may serve as a suitable transition between Low Density Residential and other more intense forms of land use, and it may also provide for greater variety and choice in housing at locations that have desirable attributes but may not be appropriate for higher density, high-rise forms of housing (3.3).

The proposed low-rise apartment buildings are in keeping with the intended uses in both the Low Density Residential designation through the intensification policies, as well as the Multi-Family, Medium Density Residential designation. Additionally, the proposed low-rise apartment building provides an alternative dwelling type, and choice according to location, size, affordability, tenure, design and accessibility, which is supported by policy 3.1.1 ii). The apartment building provides a new form of development that is not existing in the immediate environment, which adds options for accessibility and subsequently affordability based on the form, size of dwelling unit and type of development. The apartment building also supports the ability to age in place where downsizing to a different type of dwelling unit would not require a departure from the neighbourhood.

## 4.2 Intensity

### *Provincial Policy Statement (PPS)*

Healthy, liveable and safe communities are sustained by promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term, accommodating an appropriate range and mix of residential (including second units, affordable housing and housing for older persons), employment, institutional, recreation, park and open space, and other uses to meet long-term needs; and avoiding development and land use patterns which may cause environmental or public health and safety concerns (1.1.1.). This development provides an efficient housing form, accommodates a range of housing units, and does not cause public health or safety concerns. The PPS promotes cost-effective development patterns and standards to minimize land consumption and servicing costs, and encourages settlement areas to be the main focus of growth and development (1.1.3). This development is to be located on lands within a plan of subdivision, and does not require the expansion of a settlement area or extension of services.

### *The London Plan*

The range of permitted heights in the Neighbourhoods Place Type is based on street classification (\*935\_). As per \*Table 11, development can range from two to four storeys, with the allowance for bonusing up to six storeys. Zoning for the site will regulate the intensity of development that is appropriate to the neighbourhood context. Special provisions related to density and height will be added to all of the zones, as well as regulations related to front, exterior and interior setbacks. No special provisions are required for parking, coverage or landscaped open space.

As part of the discussions with the adjacent neighbours, the Applicant has indicated that they will be increasing the landscaping on the west interior side yard of 480 Edgevalley Road, and reconfiguring the parking to include a drive aisle adjacent to this property edge, in order to accommodate additional landscaping/trees adjacent to the homes on Benjamin Drive. This landscaped buffer, with a 1.8 m board on board fence, will provide more robust mitigation. The Applicant has also indicated that the fencing would be installed at the very early stages of construction, in order to mitigate any noise and dust associated with the construction process, and provide some added privacy and security. The Applicant has offered to provide an alternating double row of both deciduous and coniferous trees within that setback, with the final tree types to be selected with the help of adjacent neighbours. Additional trees will also be added to the landscaped plan wherever possible to mitigate sight lines between building balconies and adjacent properties.

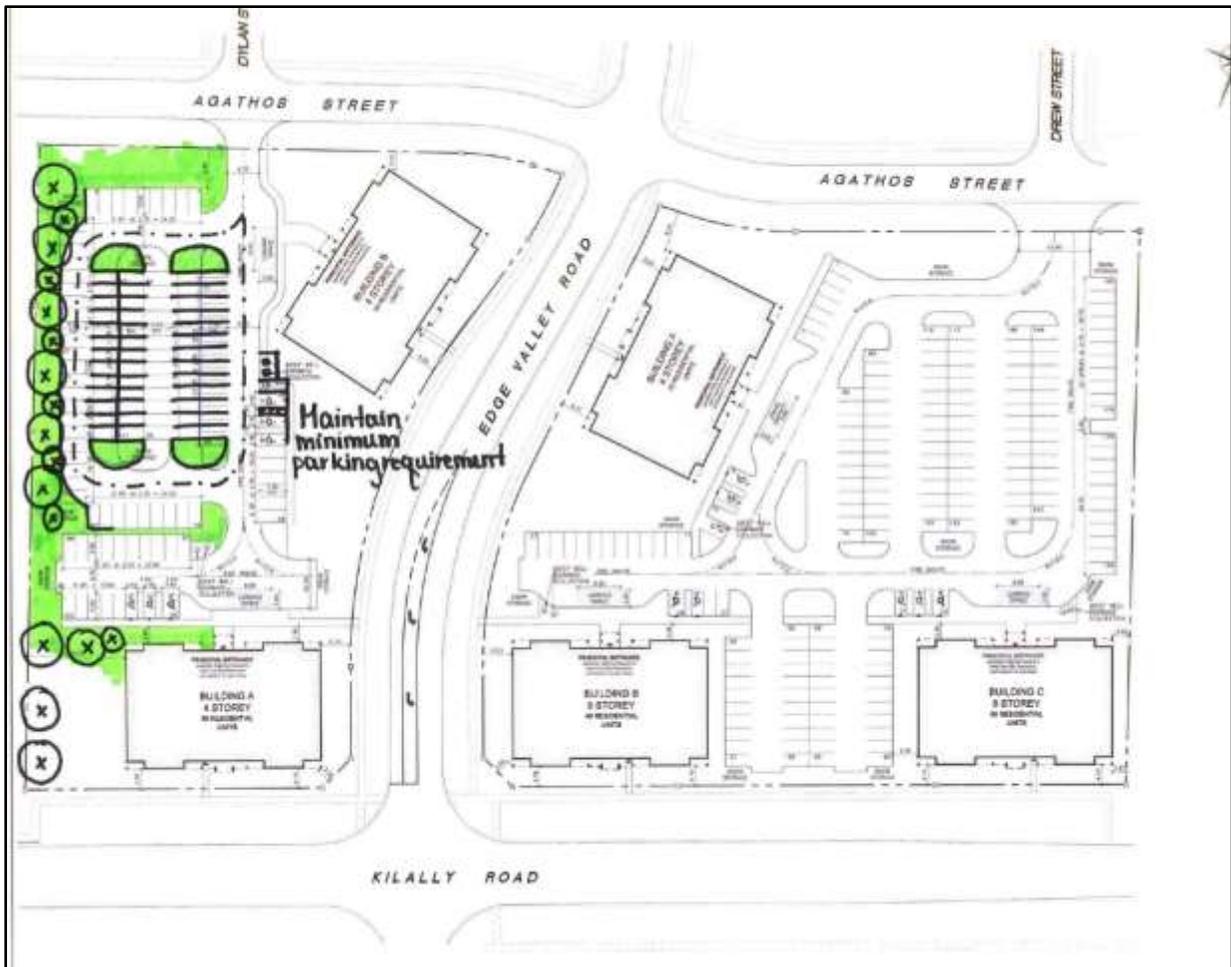


Figure 7 - Sketch from Applicant on proposed site plan changes, with additional landscaping and drive aisle, at 480 Edgevalley Road

#### (1989) Official Plan

Development within the Multi-Family, Medium Density Residential designation generally will generally not exceed four storeys and an approximate net density of 75 units per hectare. Some exceptions to the height and/or density limits may be considered through a site specific Zoning By-law amendment, including applications for bonusing under the provisions of 19.4.4 of the Official Plan (3.3.3. ii). Developments which are qualified to exceed the density of 75 units per hectare shall be limited to a maximum density of 100 units per hectare.

The subject site is proposing to develop based on the maximum allowable height and density as permitted through the MDR policies. The proposal is also for a site-specific Bonus Zone to allow for an increase in density up to the maximum of 100 units per hectare in return for such facilities, services and matters described in the Bonusing section of this report. The Official Plan allows consideration of the requested amendment through a site specific Bonus Zone in accordance with section 3.4.3 and 19.4.4, in return for the facilities, services and matters that provide public benefit which are detailed in the Bonus Section of this report.

From an intensity perspective, the developments will be focused at the street edge, primarily on Edgevalley Road and Kilally Road. The higher intensity (6 storey and 100 units per hectare) will be located on lands away from lower rise existing development, adjacent to vacant lands to the east (at 475 Edgevalley Road). The impacts of the higher intensity will therefore be minimized.

#### 4.3 Form

##### *Provincial Policy Statement (PPS)*

Built design is emphasized in the PPS by “encouraging a sense of place by promoting well-designed built form” (1.7.1 d) PPS). The proposal represents an attractive and appropriate built form with buildings orientated to the street.

*The London Plan*

From a City Design perspective, all planning and development applications will conform to the City Design policies of this Plan (\*936\_1.). Generally, the proposed development provides a diverse range of housing types and built forms within the neighbourhood, by adding a new housing form (low rise apartment) that will contribute to the community and strengthen neighbourhood character in a primarily low density residential community (\*197\_). The proposal fits within the context of the neighbourhood's residential character through the addition of pedestrian connections that link to existing streets, trails and the Edgevalley subdivision (33M-757) to the north.

The proposed low-rise apartment buildings at 480 Edgevalley Road provide a transition in height from the existing low density residential development (west of the subject site) to the four, five and six storey buildings proposed at 475 Edgevalley Road. The proposed buildings on both sites are of a scale, height and massing consistent with the Street Classification of Kilally Road and Edgevalley Road. Exterior materials will be selected to enhance the contextual fit. Parking will be located interior of the sites as much as possible, and will be screened from the streetscape, where appropriate. The taller six (6) storey residential apartments will be sited at the easterly limit of 475 Edgevalley Road, adjacent to future residential development. Moving west along Kilally Road, buildings decrease in height to provide a transition to adjacent, existing one and two storey low density residential development. Reductions in height, in addition to landscaping and parking areas, ensures the proposed development is sensitive to future low density residential development to the north (\*199\_). Buildings have been sited at the corners of the Kilally Road/Edgevalley Road intersection in order to create a gateway feature into the community and provide a neighbourhood character and identity (\*202\_).

The proposed development will provide linkages to the street and is in close proximity to the Thames Valley Parkway (TVP) to the north. Infrastructure and amenities to support active modes including bicycle parking, pedestrian scaled lighting and amenity space have been proposed (\*217\_). Crime Prevention Through Environmental Design (CPTED) principles have been incorporated into the proposed site plan, by implementing natural surveillance principles through orientation of building entrances onto Kilally Road and Edgevalley Road. The siting of buildings with frontage onto the streetscape provides additional "eyes on the street". Parking lots will also be framed by a wall of windows and surveillance through their location in the interior of the development blocks. Internal sidewalks and amenity spaces on site will have adequate lighting levels in all seasons, weather and times of day to avoid blind spots. Access control will be provided through clearly identifiable point(s) of entry into all buildings defined by building materials, pathway texture changes and lighting. The proposed development will provide well-defined site entrances for vehicular access and egress which will be enhanced by site lighting (228\_).

The development proposal will avoid noise walls as the buildings front the higher order roads (Kilally Road and Edgevalley Rad). No front yard parking is proposed as part of this proposal.

*(1989) Official Plan*

Low rise apartment dwellings up to four storeys are permitted within the Multi-Family, Medium Density Residential designation, subject to criteria related to impact and compatibility.

Pursuant to Section 3.3.3 of the (1989) Official Plan, the applicant has provided a detailed Urban Design Brief which demonstrates what effects this proposal may have on the neighbouring lands:

- Transition and compatibility between existing adjacent residential uses and proposed residential buildings and the associated parking area is achieved through the site design, which provides for robust landscaping and fencing between existing and proposed development (480 Edgevalley Road);
- Lighting throughout the development is to be provided by using non-glare lighting

- fixtures in parking areas and open spaces;
- Privacy fencing will be installed along the western property boundary of 480 Edgevalley Road. This is intended to be supplemented by landscaping, including large species plantings (trees) which would produce a compatible interface between the proposed buildings and the existing residences;
- The proposed site design, particularly with the five and six storey buildings, are located away from existing low rise residential, and will be located along Kilally Road.

The site plan will implement the above noted features and ensure mitigation measures to limit impacts are utilized.

#### **4.4 Bonusing**

The requested amendment is for a Site Specific Bonus Zone to allow for the increase in building height and density. The consideration for Bonus Zoning is through Chapter 19 of the (1989) Official Plan and policies 1638 of The London Plan which sets out the various facilities, services and matters that can be provided as a public benefit for the increase.

The Applicant has requested a Bonus Zone in exchange for affordable housing, which is a permitted facility and service under both The London Plan and the (1989) Official Plan.

Planning staff have consulted with Housing Development Corporation (HDC), to determine what the suitable amount of affordable housing would be for the proposed development, taking into consideration the proposed bonusing, scale of the increased height and density, the location and context, and the 'lift' from the existing zone to the proposed Bonus Zone.

The recommended Bonus Zone is to provide for four (4) affordable, barrier-free housing units (three one bedroom and one two bedroom units) at a rate of 85% of CMHC average market rent for a duration of 15 years, which was established through HDC's in-house knowledge of local affordable housing needs and demands, local industry measures including CMHC rental market and housing analytics, City neighbourhood profiles, and labour market data, as well as a review of the bonusing policies and practices of other major urban centres. The recommended Bonus Zone considers the difference between the number of units permitted under the existing height and density permissions and the height and density being sought through the Bonus Zone.

Overall, the additional height and density will be located away from existing residential/single detached homes, thereby lessening any impact on adjacent development.

#### **4.5 Community Concerns**

Through the circulation process and at the Community Information meeting, comments were received from the public, which fall into three broad categories, being Building Design, Impacts on adjacent Development and Transportation:

##### *Building Design:*

Comments on the building design include the amount of paved surface and parking on site (impermeable surfaces), stormwater and grading issues, increased open space/landscaping on site adjacent to existing homes, underground parking, and increased buffering/setbacks adjacent to existing development.

Additional landscaping and fencing will be provided along the western property edge of 480 Edgevalley Road. This has been shown on the revised sketches provided by the Applicant and agreed to by neighbouring residents. The addition of more robust fencing, more tree plantings, and a slight reconfiguration of the parking area will help to lessen any possible impacts on adjacent neighbours. The development of the site will also ensure appropriate stormwater servicing is installed and will alleviate any runoff concerns. The amount of parking provided is required as per the zoning by-law, which

requires 1 space per 1.5 dwelling units. The proposed development at 480 Edgevalley Road is providing 119 spaces (for 78 units), which includes 6 accessible parking and 10 visitor parking. The development at 475 Edgevalley Road is providing 202 spaces (for 147 units), which includes 8 accessible parking and 19 visitor parking. Both sites exceed the minimum parking requirements.

#### *Impact on Adjacent Development*

Residents raised concerns related to possible impacts that include noise, lighting, privacy, safety, and security.

The Applicant has implemented a number of CPTED (Crime Prevention Through Environmental Design) principles with this development; including building orientation to provide for 'eyes on the street', appropriate lighting, and the placement of buildings have all been used to improve safety in the area. Lighting will be provided to illuminate the development but will be situated so as not to impact adjacent development. Fencing will be incorporated to help lessen any potential noise concerns.

Residents also raised compatibility issues, property value implications, lower transition from two storey single detached to multi-storey buildings, lower densities, impact of affordable housing, impact of student housing, the contribution of the development to the neighbourhood, and the overall expectation of lower densities and heights.

The subject lands have been designated as Multi-Family, Medium Density Residential since being incorporated into the City of London's Official Plan in 1998. Under the Multi-Family, Medium Density Residential designation the Official Plan permits multiple-unit residential developments having densities up to 75 units per hectare and heights up to four storeys. This housing form and density is contemplated in both the (1989) Official Plan and the London Plan.

Land Use Planning principles consider use, intensity and form in determining the suitability of proposed uses in accordance with the Provincial Policy Statement, Official Plans, Zoning By-laws and Community Area Plans. The matter of property values is not included as part of an evaluation undertaken by land use planners.

The City does not anticipate that existing long term residents of this neighbourhood will deal with issues of neighbourhood character relating to student housing, as this area is not within the Near Campus Neighbourhoods Area.

#### *Transportation*

Concerns were raised regarding high traffic volume in the area and the effect this development will have on the neighbourhood. No traffic study was required as part of this application, as the amount of units did not trigger the need for a further traffic assessment. The recent subdivision and the creation of Edgevalley Road, a secondary collector/neighbourhood connector, anticipated the traffic volumes that will be generated by this development. Through the approval of the adjacent subdivision, it was anticipated that Benjamin Drive, which is currently connected to Kilally Road, would be a temporary street, and will therefore be closed and all traffic will access this area via Edgevalley Road. Therefore cut through traffic into the surrounding streets should not occur. All accesses for both of these development will be located off of Agathos Street.

Many residents spoke of traffic concerns off site, such as Webster Street, speed limits on Highbury Avenue, and the need for more stop lights on Highbury Avenue. For the residents on Webster Street, additional information on sidewalk installations, traffic calming, street lights and municipal services was provided. This application will not trigger any adjacent road improvements, and the applicant will not be required to pay for any additional road work improvements. Transportation Division has indicated that the last traffic count at Highbury & Edgevalley was in 2009. This location is in the 2019 data collection schedule. It is noted that there is new development underway at this location east of Highbury Avenue, so traffic signals may be warranted within the next few years. A set of criteria is used for the reduction of speed limits on arterial roads such as Highbury Avenue. At this point, no reduction is anticipated for Highbury Avenue at this

location, but it is possible as development occurs that these speed limits may be reassessed.

More information and detail is available in Appendix B and C of this report.

## **5.0 Conclusion**

The recommended amendment is consistent with the *Provincial Policy Statement (PPS), 2014*, as it promotes efficient development and land use patterns, and is consistent with the in-force policies of The London Plan, and the Neighbourhoods Place Type. The recommended amendment permits a form and intensity of medium density residential development that conforms to the (1989) Official Plan, and the Bonus Zoning policies. The recommended amendment will allow for an increase to height and density in return for a series of bonusable features, matters and contributions that benefit the public in accordance with Section 19.4.4 of the (1989) Official Plan. The recommended Zoning By-law amendment allows development that is consistent with the land use concepts and guidelines in the Kilally North Area Plan, which encourages medium density housing forms that are designed without the need for noise attenuation walls in this location and recognizes transition with existing residential development. The proposed use contributes to the range and mix of housing options in the area, and provides an efficient development and use of land. The subject lands are of a size and shape suitable to accommodate the proposal. The recommended Zoning By-law amendment provides appropriate regulations to control the use and intensity of the building and ensure a well-designed development with appropriate mitigation measures.

<b>Prepared by:</b>	<b>Nancy Pasato, MCIP, RPP</b> <b>Senior Planner, Development Services</b>
<b>Recommended by:</b>	<b>Paul Yeoman, RPP, PLE</b> <b>Director, Development Services</b>
<b>Submitted by:</b>	<b>George Kotsifas, P.ENG</b> <b>Managing Director, Development and Compliance</b> <b>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	

August 30, 2019  
NP/np

cc: Matt Feldberg, Manager, Development Services (Subdivisions)  
Lou Pompilii, Manager, Development Planning  
Ismail Abushehada, Manager, Development Engineering

**Appendix A**

Bill No. (number to be inserted by Clerk's Office)  
2019

By-law No. Z.-1-19\_\_\_\_\_

A by-law to amend By-law No. Z.-1 to rezone an area of land located at 475 and 480 Edgevalley Road.

WHEREAS Drewlo Holdings Inc. have applied to rezone an area of land located at 475 and 480 Edgevalley Road, as shown on the map attached to this by-law, as set out below;

AND WHEREAS this rezoning conforms to the Official Plan;

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

1. Schedule "A" to By-law No. Z.-1 is amended by changing the zoning applicable to lands located at 475 and 480 Edgevalley Road, as shown on the attached map comprising part of Key Map No. A103, from a Holding Residential R5/R6 (h\*h-54\*R5-7/R6-5) Zone to a Residential R8 Special Provision (R8-4(\*)\*H15) Zone and a Residential R8 Special Provision Bonus (R8-4(\*\*)\*H16\*B( )) Zone.

2. Section Number 4.3 of the General Provisions is amended by adding the following Site Specific Bonus Provision:

B( ) 475 Edgevalley Road

The Bonus Zone shall be enabled through one or more agreements to facilitate the development of three (3) low-rise apartment buildings, with a maximum of four (4) storeys (Building A = 16m), five (5) storeys (Building B= 18m) and six (6) storeys (Building C = 22m), a total of 147 dwelling units (Building A = 39 dwelling units; Building B = 49 dwelling units; Building C = 59 dwelling units), and a density of 100 units per hectare,

Provision of Affordable Housing

The provision of four (4) affordable rental housing units, established by agreement at 85% of the CMHC average market rent for a period of 15 years. An agreement shall be entered into with the Corporation of the City of London, to secure said affordable housing units for the 15 year term.

The following special regulations apply within the bonus zone:

a) Regulations:

- i) For the purpose of this by-law, the front lot line shall be deemed to be Kilally Road.
- ii) Density: 100 units per hectare  
(Maximum)
- iii) Height of Building A Four (4) storeys  
(Maximum): 16 metres (52.5 feet)  
Height of Building B Five (5) storeys  
(Maximum): 18 metres (59.1 feet)  
Height of Building C Six (6) storeys

- (Maximum): 22 metres (72.2 feet)
- iv) Front Yard Setback  
(Minimum): 2.0 metres (6.6 feet)  
(Maximum): 6.0 metres (19.7 feet)
- v) Exterior Side Yard Depth - Edgevalley Road  
(Minimum): 3.0 metres (9.8 feet)  
(Maximum): 7.0 metres (23.0 feet)
- vi) Exterior Side Yard Depth - Agathos Street  
(Minimum): 2.0 metres (6.6 feet)
- vii) Interior Side Yard Depth  
(Minimum): 2.75 metres (9.1 feet)

3. Section Number 12.4 of the Residential R8 (R8-4) Zone is amended by adding the following Special Provision:

- R8-4(\*) 480 Edgevalley Road
- a) Regulations:
- i) For the purpose of this by-law, the front lot line shall be deemed to be Kilally Road.
- ii) Density 75 units per hectare  
(Maximum):
- iii) Height Four (4) storeys  
(Maximum): 15 metres (49.2 feet)
- iv) Front Yard Setback  
(Minimum): 2.0 metres (6.6 feet)  
(Maximum): 6.0 metres (19.7 feet)
- v) Exterior Side Yard Depth - Edgevalley Road  
(Minimum): 3.0 metres (9.8 feet)  
(Maximum): 7.0 metres (23.0 feet)
- vi) Exterior Side Yard Depth - Agathos Street  
(Minimum): 2.0 metres (6.6 feet)

4. Section Number 12.4 of the Residential R8 (R8-4) Zone is amended by adding the following Special Provision:

- R8-4(\*\*) 475 Edgevalley Road
- a) Regulations:
- i) For the purpose of this by-law, the front lot line shall be deemed to be Kilally Road.
- ii) Density 75 units per hectare  
(Maximum):
- iii) Height Four (4) storeys  
(Maximum): 16 metres (52.5 feet)
- iv) Front Yard Setback  
(Minimum): 2.0 metres (6.6 feet)  
(Maximum): 6.0 metres (19.7 feet)

v) Exterior Side Yard Depth - Edgevalley Road  
(Minimum): 3.0 metres (9.8 feet)  
(Maximum): 7.0 metres (23.0 feet)

vi) Exterior Side Yard Depth - Agathos Street  
(Minimum): 2.0 metres (6.6 feet)

5. The inclusion in this By-law of imperial measure along with metric measure is for the purpose of convenience only and the metric measure governs in case of any discrepancy between the two measures.

6. This By-law shall come into force and be deemed to come into force in accordance with Section 34 of the *Planning Act, R.S.O. 1990, c. P.13*, either upon the date of the passage of this by-law or as otherwise provided by the said section.

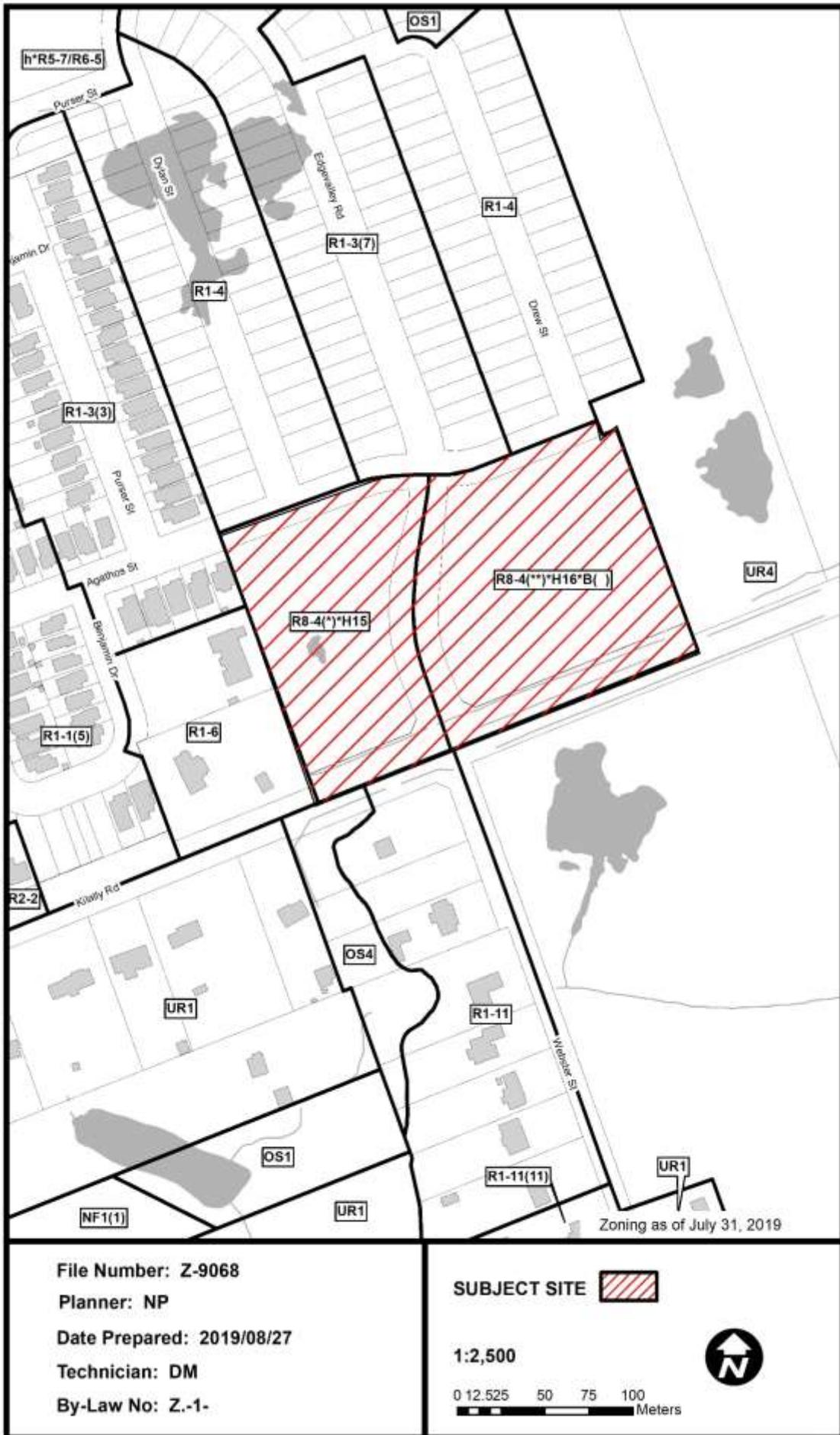
PASSED in Open Council on September 17, 2019.

Ed Holder  
Mayor

Catharine Saunders  
City Clerk

First Reading – September 17, 2019  
Second Reading – September 17, 2019  
Third Reading – September 17, 2019

AMENDMENT TO SCHEDULE "A" (BY-LAW NO. Z.-1)



## Appendix B – Public Engagement

### Community Engagement

**Public liaison:** On June 3, 2019, Notice of Application was sent to 58 property owners in the surrounding area. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on June 6, 2019. A “Planning Application” sign was also posted on the site.

13 replies were received.

A Neighbourhood Community Meeting was held on August 7, 2019 by the Applicant at Siloam United Church. 45 people attended the meeting. Those comments have also been summarized below.

**Nature of Liaison:** The purpose and effect of this zoning change is to permit two apartment buildings, each 4 storeys (15m) in height, for a total of 78 residential units at 480 Edgevalley Road, and three apartment buildings, ranging from 4-6 storeys in height (up to 22m), for a total of 147 residential units at 475 Edgevalley Road. Possible change to Zoning By-law Z.-1 from a Holding Residential R5/R6 (h\*H-54\*R5-7/R6-5) Zone TO a Residential R8 Special Provision (R8-4( )\*H15) Zone to permit apartment buildings, handicapped person’s apartment buildings, lodging house class 2, stacked townhousing, senior citizen apartment buildings, emergency care establishments, and continuum-of-care facilities at a maximum height of 15 metres and a maximum density of 75 units, with a special provision for a reduced front and exterior side yard depth of 0 metres (480 Edgevalley Road), and to a Residential R8 Special Provision Bonus (R8-4( )\*H16\*B( )) Zone to permit apartment buildings, handicapped person’s apartment buildings, lodging house class 2, stacked townhousing, senior citizen apartment buildings, emergency care establishments, and continuum-of-care facilities at a maximum height of 16 metres and a maximum density of 75 units, with a special provision for a reduced front and exterior side yard depth of 0 metres. The bonus zone (B-( )) would permit a maximum height of 6 storeys (or 22 metres) and a maximum residential density of 100 units per hectare in return for eligible facilities, services and matters outlined in Section 19.4.4 of the Official Plan and policies 1638-1655 of The London Plan. Other provisions such as setbacks, parking reductions, and holding provisions for servicing and design may also be considered through the re-zoning process as part of the bonus zone.

**Responses:** A summary of the various comments received include the following:

#### Concern for:

- Transition from low density to high density
- This development will not enhance the neighbourhood
- Property values will be affected
- Privacy concerns
- Traffic and impacts to safety, road capacity
- Crime as a result of new development
- Impact on adjacent homes from parking lot
- Possible student housing
- safety, privacy
- Noise
- Expectation of lower densities and housing form
- Increases in impermeable surface/SWM/flooding issues
- Lack of greenspace on plan/landscape buffer
- Parking should be underground
- Webster Street - improvements
- When will traffic lights be installed?
- Total population of development?
- Need overall road improvements i.e. reduce speeds on Highbury Avenue, left and right turn lanes of Kilally and Highbury and upgrades needed

- Transition should be to three storeys on 480 Edgevalley, at existing density of 40upha
- Reduce parking/paved area on site
- Increased buffering and landscaping adjacent to existing homes/more greenspace on site
- Increased setbacks of buildings on the site/not adjacent to road
- Taller fencing with better materials adjacent to existing homes
- Privacy and safety concerns, especially related to low income development
- Traffic and impacts to safety, road capacity, noise
- Webster Street - concerns related to lack of sidewalks, lack of street lights, need traffic calming measures, and lack of municipal services
- When will traffic lights be installed?
- Speed limits should be reduced on Highbury Avenue

**Responses to Public Liaison Letter and Publication in “The Londoner”**

Telephone	Written
Karin Williamson 1505 and 1509 Webster Street (also written)	Paul Dube 1478 Agathos Street
Andrew Stewart 1507 Agathos Street (also written)	Scott Harris 930 Blackmaple Court
Mary Overholt 1546 Benjamin Drive	Randy & Dianne Silverthorne 1501 Agathos St.
	Yvonne White President, MCC 725 27-44 Edgevalley Road
	Sarah Leeming-Strickland 1583 Benjamin Drive
	Mike & Lydia Hermant 1530 Benjamin Drive
	Andrew Stewart 1507 Agathos Street
	Karin Williamson 1505 and 1509 Webster Street and Ken Williamson Homes 15060 Nine Mile Road
	Stephanie Henshaw 1522 Benjamin Drive
	Ian and Cynthia Johnston 43-765 Killarney Road

Written:

*Paul Dube*  
*1478 Agathos Street*

In regards to the subject zoning bylaw amendments, we request that the city deny the proposed changes requested by the developer.

After conversations with several of the existing neighbours, along Agathos St and Purser St, we feel that the construction of 5 and 6 storey buildings will not enhance the neighbourhood and will have grave consequences on the property values of our houses. We request the denial based on the following:

The London Plan (2016)

Policy 253: Site layout should be designed to minimize and mitigate impacts on adjacent properties.

- The construction of 5 and 6 storey buildings will not add to the property value of our existing homes.

Policy 298: An appropriate transition of building height, scale and massing should be provided between developments of significantly different intensities. This may be an important consideration at the interface of two different place types.

- The transition is far too quick, from our existing 2 storey houses to 4, 5 and 6 storey buildings. Also given that the land naturally rises, running east along Agathos St, the proposed buildings will look even taller.

City of London Official Plan (1989)

3.3.3 ii) Medium density development will not exceed an approximate net density of 75 units per hectare (30 units per acre).

- A six storey building will exceed this density.

11.1.1 xiv) To the extent feasible, the design and positioning of new buildings should minimize the loss of privacy for adjacent residential properties.

- The natural land rise, combined with the height of these apartments will take away privacy of our existing houses.

Please pass our request on to the planning committee, before the deadline.

*Scott Harris*

*930 Blackmaple Court*

It has come to my attention that Drewlo Holdings has submitted a request for a zoning bylaw change at the addresses shown in the subject line. I am a resident in the area and would like to voice my concern about any change that would increase the population density in this area. The vehicle traffic along Kilally Road is becoming increasingly heavy and will continue to do so as the planned developments proceed. A move to higher density housing will further exasperate this condition. Although the intersection to this development has been modified to handle higher density traffic the arterial roads feeding this intersection are not, in my opinion, of sufficient capacity to handle the increased traffic flow. I am also concerned about the impact this development could have on crime in the area. The surrounding neighbourhoods are already impacted by "affordable housing" areas where there is increased criminal activities by some of the occupants. Access to lower density properties is facilitated by the multi-use paths and walkways that are included in these developments. Inserting higher density affordable housing into the middle of such a development will further increase the opportunity for criminal activity. If this application proceeds I would expect that there would be some public consultation meetings required. I would like to be made aware of any such meetings when they are scheduled. I would appreciate any assistance you can provide with this.

*Randy & Dianne Silverthorne*

*1501 Agathos St.*

Asking about the above address, there is a zoning by-law amendment (file Z-9068) being presented to city hall. This being an amendment, I am curious about what was originally zoned for this area. When we purchased our home 3 years ago, we were told the zoning was for "for sale" condominiums. With this amendment, it appears that we will be "looking" at a parking lot in front of the 4 floor apartment building. Other than the parking lot, will the building's proximity to Fanshawe College bring an undesirable element to our little corner of the world? My wife and I moved from the Blackfriars area after being there for 42 years. We wouldn't like to have the same occurrence here.

*Yvonne White*  
*President, MCC 725*  
*27-44 Edgevalley Road*

I have read the promo for the low rental apartment buildings that are for 480 Kilally. My objections are as follows:

One: The city is thinking about allowing low rentals in a community where the houses are anywhere between 400,000 to ????. Can you guarantee us that our house worth will continue to grow with low rentals this close? Do our taxes get lowered??

We all know from experience that renters in low rentals, most but not all, do not look after their places of living. Take a look at Boulee Street and Kipps Lane. There are things hanging out of the balcony, bikes and toys everywhere. How are houses going to sell here and around the area? Cheaper so that our homes are not worth as much?

I am not a snob, however I bought here due to the price and the surrounding area.

Across the river there are very nice expensive homes, expensive condos at 99, 44 Edgevalley Road and on Highbury Ave. We have a gas station on Kilally that has never opened but is now an eye sore. Actually if that one ever opens, it will be 7 gas stations in a 3.3 km area.

*Sarah Leeming-Strickland*  
*1583 Benjamin Drive*

I am writing today to express my strong opposition to the proposed re-zoning at Edgevalley and Killaly streets to allow multi-story residential buildings on this site. I live on Benjamin Dr, in the adjacent subdivision, and chose to move to this neighbourhood with my family as it was a quiet and peaceful area with single family homes. The introduction of multi-story buildings, with over 200 units will drastically change our neighbourhood. As our neighbourhood is located quite close to Fanshawe College, I have grave concerns that multi-story buildings in our area will be filled with students. While post-secondary students can of course be wonderful neighbours, when there is a concentration of short term (1 year) renters in an area, the culture of the neighbourhood changes. We currently have students who rent houses in our subdivision, and are wonderful neighbours, but they are scattered throughout the area, not concentrated in one very small corner. There are many children in our neighbourhood and there are at least 6 different school buses that pick up and drop off children every single day. I have serious safety concerns for our children who wait for the bus, if such a large increase in traffic were to be introduced to this area. It is already very dangerous to have our children ride their bikes or walk along the sidewalks on Killaly Rd. as people drive far too fast along this route between Clarke Rd. and Highbury Ave., and the added congestion that over 200 apartments will bring is scary. Many of us who have recently purchased our houses (within the last 5 years) have done so after reviewing the plans for the proposed development of the lots to the North and East of our homes. The plans were for single family homes, as well as condo style town-homes to be built. This is what we expected when we purchased the house, and I am extremely disappointed and upset at the proposed change. I would strongly encourage the City of London to deny the re-zoning request of Drewlo and not allow multi-story residential buildings to be built.

*Mike & Lydia Hermant*  
*1530 Benjamin Drive*

We are homeowners that occupy a single-family residential property that abuts the largest existing portion of the proposed development site, and would like to be provided with additional supporting information regarding the proposed zoning amendment. When we purchased our property on Benjamin Drive in 2012, we were aware that future development was planned for the vacant land in question, but that it was not zoned for high-density residential apartments such as those included in the proposal. Consider this letter as our formal appeal application; if an appeal needs to be filed via other means, then provide additional details so we can ensure the appeal against this file is submitted appropriately & within the time limits provided.

When site preparation operations began on the development property in 2018, we had opportunity to meet with the site engineer for MTI Engineering (Randy Lucas) who reviewed the city-approved site plan with us, which clearly indicated that the area

directly adjoining our property was zoned for medium-density residential units, and he indicated that the only apartment-style multi-story building approved by the City of London was located at the corner of Highbury Ave & Edgevalley Road, at the north-west end of the new development. He also indicated that the zoning in place would permit the developer to commit to condominium-style townhomes, or something similar, which would not exceed 2 stories in height.

We have significant concerns with the zoning amendment proposal that we intend on bringing forth since our property & personal security is likely the most impacted by these proposed changes. Please provide details for the public meeting where we can voice our concerns & objections to this proposal. Our councillor (Mo Salih) is cc'd on this message, and we look forward to the opportunity to meet with him personally to review the many concerns we have with the zoning amendment proposal.

*Andrew Stewart*  
*1507 Agathos Street*

I would like to lodge a formal complaint and objection to the proposed zoning changes for above referenced lands.

My wife and I own 1507 Agathos street and do not want to have apartment complexes and large parking lot beside my residence. I have emailed you before to add me to the distribution list and keep me informed regarding the development of this new subdivisions but have never received any emails regarding this. I am extremely upset that no one reached out to the neighboring properties for input on the proposed changes. I found out about this from a sign that was posted but wish that I was contacted directly. Drewlo Holdings seems to be able to set their own rules and not follow the current zoning that is in place. The planned subdivision has already nearly lapsed many times and I don't feel the zoning should be changed just because a large developer wants to increase the density and their profit margins.

Reasons for not wanting rezoning include:

- Do not want high density development in my back yard (fish bowl effect)
- Traffic is already bad enough and will be much worse once the subdivision and funeral home are completed.
- Do not want to increase the impermeable surface coverage (worried about surface runoff water).
- Do not want a large parking lot with no trees.
- Drewlo has already clear cut the forest that used to grow beside my house and now they want to pave the entire site which has environmental and hydrological impacts.

I look forward to hearing more about this proposal and hope that the city can work with the existing residence to avoid this unnecessary proposed zoning change.

*Mary McKenzie*  
*438 Briarhill Avenue*

I am totally against allowing a zoning change for the area of Edgevalley & Kilally roads. We do not need apartment buildings in this lovely quiet single family homes neighbourhood. Please don't change the zoning for this area.

*Karin Williamson*  
*1505 and 1509 Webster Street*  
*and Ken Williamson Homes*  
*15060 Nine Mile Road*

Further to our conversation last week I would like to reiterate and add to our concerns.

We are holders of 2 large residential lots at 1509 and 1505 Webster Street and are negatively affected by this proposal. The original draft plan by Drewlo Holdings included single family and townhouse developments along Kilally Road, serving as a buffer between single family and high density development. The proposed zero setbacks and apartment buildings are a drastic change and not welcome.

The huge proposed parking lots to service high rise dwellings are more conducive for a shopping mall. Would underground parking not be a better option? The anticipated population would nearly double and traffic would negatively affect Kilally Road to the east as well as Webster Street to the south, both being the equivalent to paved county roads. Webster Street has a deep culvert closer to Jensen Road that has a metal guard to the west and an old tree to the east, none of the locals pass each other at that location but take turns.

The Homes on the west side of Webster Street between Jensen and Kilally Roads were built on lots 100' wide more or less with setbacks of 100'. These homes are on septic tanks and wells. There are no sidewalks, curbs or gutters with the exception of curbs and gutters at 1499 to 1505 Webster Street at the reconstructed Street section. Homes constructed on the south side of Kilally between Highbury Ave and Webster Street were built to similar specifications but have curbs and gutters - but do not have sidewalks; on the north side of Kilally Road there are sidewalks from Highbury Ave to Edgevalley Roads as well as curbs and gutters. To align Webster Street and Edgevalley Roads Webster Street's grade was lowered by the City and a retaining wall was proposed of 2' in height at 1499 Webster Street gradually increasing to 9' at 1505 Webster Street. A three foot error occurred and we now have a retaining wall that starts at 6' and graduates to 10' along the three properties. The newly constructed wall makes it impossible to see oncoming traffic from the left at the stop sign on Webster Street, you have to advance two car lengths into the intersection to be able to do so. When will the proposed traffic lights be installed? The expected services on the three properties were not provided. Also street lights, traffic lights at the intersection, sidewalks, hydro poles moved to the east side of Webster only showed on the City plans displayed at Montcalm High school to the general public. Please note that the changes to the road on Webster Street started in May of last year, the work is not yet completed. We had been told that this work would be completed in 4 months. Trusting that the foregoing information is helpful.

*Stephanie Henshaw*  
*1522 Benjamin Drive*

Just want to send an email to express my concerns about the zoning by law for apartment buildings on EdgeValley Road. I currently am raising my 4 young kids in a single detached home on Benjamin Drive. It is a nice quiet neighbourhood. Many houses are already being added along Edgevalley Road at Killaly just to the east of us. This will bring many more families to the area. Adding 5 apartment buildings is going to bring even more traffic and population to the quiet area than we are already getting with the new house a going in. I am really concerned about the safety of my kids as they wait alone at the bus stop before school in the mornings, and play outside all the time, with the influx of many more people brings greater risk to their safety. Please consider the families who live on our street who moved here because it was a small, quiet, safe neighbourhood.

*Al Veltman*  
*69-1430 Highbury Avenue*

Just some comments and observations re above development.

This is a huge development in a rural style setting that is going to present a traffic nightmare. Traffic flow has not been well thought out and if the development is allowed to be built as proposed, there will shortly be a demand to upgrade all roads and traffic lights costing \$millions for the tax payer for the benefit of the developer.

Here is the problem.

With the population density allowed, what will be the final total population of the new development? It looks like it could be in the thousands.

Traffic flowing from the development onto either Highbury or Kilally will be a nightmare. Most of the traffic onto Kilally will turn west to Highbury. The turning lanes at Kilally are inadequate now and with the new development and the funeral home will be impossible. Similarly, turning onto Highbury from Edge Valley will be impossible.

In addition, Kilally needs to be upgraded all the way from Webster to Clarke. As will Webster from Kilally to Jensen.

This development will shortly require an upgrade at Kilally and Highbury, Edge Valley and Highbury, Kilally and Clarke.

Possible these upgrades will require traffic lights at Edge Valley and Highbury and Clarke and Kilally.

Since all this is for the benefit of Drewlo Holdings, they need to be responsible for the cost of these upgrades including the upgrade to Kilally to Clarke and of Webster street. Please do not allow any zoning changes or a finalization of the plans until Drewlo has upgraded all those areas for a reasonable traffic flow.

If these concerns are not dealt with before building begins, the tax payer will pay dearly. Furthermore, the speed on Highbury will have to be reduced from 70 to 60 kph.

*Ian and Cynthia Johnston*  
*43-765 Killarney Road*

1. Did City Hall's original plan have stipulations as to what would be acceptable in terms of population density and numbers and types of multi-family buildings allowed for this development/subdivision?
2. Did Drewlo's initial plan for development need to be amended to conform with the City's plans/intentions for this property?
3. Did Drewlo's original plan for subdivision include any 4, 5, or 6 storey low-rise apartment buildings and was there any discussion on such buildings at the time the original plan was approved?
4. How does "Bonusing" work so that height ranges of buildings can be increased from the maximum permitted by City by-laws?
5. Will traffic lights be added at Edgevalley and Highbury? With lights on Highbury already at Fanshawe, Killarney, Kilally, and Fuller, the addition at Edgevalley would mean 5 lights in a relatively short distance on what I thought was supposed to be one of the major north - south corridors. Also, I'm sure Drewlo has provided some sort of traffic study but the fact lanes of Highbury had to be closed off to regular traffic to allow construction vehicles in and out should be indicative of problems in the future and this occurred at times of low construction activity.
6. In past developments has Drewlo made an original plan of subdivision only to subsequently apply for amendments to increase density?
7. Does the City "earn" additional fees if an amendment to the original plan is accepted?

### **Agency/Departmental Comments**

*Housing Development Corporation - June 24, 2019*

Background:

Housing Development Corporation, London (HDC) was engaged as a third party to support information, facilitate negotiation, and assist in the provision of a fair recommendation to Development Services in response to an action under Sections 34 and 37 of the Planning Act that included a request for an increase in height and density ("lift") above and beyond what would otherwise be permitted in the Zoning By-law in return for eligible facilities, services and matters, including the provision of affordable housing.

Requested Zoning By-law Amendment:

The purpose and effect of the Zoning By-law amendment requested by Drewlo Holdings Inc. (the proponent) is to provide for the development of:

- 3 apartment buildings, ranging from 4 to 6 storeys in height, totalling 147 residential units on lands known municipally as 475 Edgevalley Road (shown as Buildings "A", "B" and "C" on Block 139, Attachment 1a); and,
- 2 apartment buildings, 4 storeys in height, totalling 78 residential units on lands known municipally as 480 Edgevalley Road (shown as Buildings "A" and "B" on Block 140, Attachment 1a).

The details of the requested Zoning By-law Amendment, including consideration of facilities, services, and matters of public benefit, were identified in the proponent's April

30th, 2019 Planning Justification Report submitted to the Corporation of the City of London in support of their requested action. To provide for the increased height and density sought through bonusing for Buildings “B” and “C” on Block 139, Drewlo Holdings Inc. has engaged in discussions with HDC to facilitate the provision of affordable rental housing units. This letter reflects the recommendation of HDC to City of London Development Services as fair consideration of bonusing for affordable rental housing in Buildings “B” and “C” on Block 139.

**RECOMMENDATION:**

HDC would acknowledge the progressive philosophy and approach demonstrated by Drewlo Holdings Inc. in the negotiation of the elements to the bonus zone detailed below. The recommended bonus provides for a mix of bedroom types, deeper levels of housing affordability, and the alignment of the bonus with populations in need of housing with support.

Based on the review of the proponent’s proposed project plans for 475 Edgevalley Road (specifically Buildings “B” and “C” on Block 139) it is the recommendation of HDC that the Director, Development Services advance the following requirements within the affordable housing bonus zone:

1. Assuming a total uplift of 37 units (for Building B and Building C), a total of three 1 bedroom units and 1 two bedroom unit be considered for dedication to affordable rental housing in exchange for the granting of increased height and density. Two of these units should be located in Building “B” and two units should be located in Building “C”. All four of the identified affordable units in Building “B” and “C” are to be barrier-free;
2. “Affordability” for the purpose of any associated encumbrance agreement (see below) be defined as rents not exceeding 85% of the Average Market Rent, as defined at the time of occupancy, and where:
  - i. Average Market Rent (AMR) of the affordable units be defined as the single bedroom AMR rate and two-bedroom AMR rate for the London Census Metropolitan Area by CMHC at the time of building occupancy;
  - ii. The identified units will be scattered throughout Building “B” and Building “C” and may be constructed to a more modest level but within the affordable housing size and attribute guidelines of HOC (see Attachment 2), and,
  - iii. The rents of the defined affordable units will only be incremented in rents to the allowable maximum once per 12-month period in accordance to the Residential Tenancy Act or any successor legislation; and
3. The duration of the affordability period be set at 15 years from the point of initial occupancy of all 4 designated affordable rental units. Sitting tenants residing in designated affordable housing units at the conclusion of the agreement would retain their security of tenure and adjusted affordable rents until end of their tenancy. These rights would not be allowed to be assigned or sublet.

These, and any other amended conditions to be confirmed by Municipal Council, need to be secured through an encumbrance agreement ensuring compliance and retain the value of the affordable rental housing bonus Zone (at an estimated rate of approx. 50% of the construction cost of the affordable units) over the 15-year affordability period. An agreement would also address other conditions including tenant selection. Any such agreement to retain the affordable rental housing would be subject to terms defined by the City Solicitor and to compliance reviews and remedies similar to other affordable housing development agreements of the City and HDC.

In addition to the items to be secured through the encumbrance agreement identified above, HDC would recommend that Orewlo Holdings Inc. be required to enter a Memorandum of Understanding with HOC to align the bonus units with an identified population in need of housing with supports. The designated use of the bonus units and associated Memorandum of Understanding would be subject to mutual agreement and may be substituted or altered during the duration of the affordability bonus (15 years) by mutual agreement with the concurrence of the parties. The associated support service

agency would retain responsibility for tenant selection in consultation with Drewlo Holdings Inc.

Rationale for Affordable Housing Bonus:

The London Plan recognizes that average market rent is out of reach for many Londoners and that housing affordability is one of the City's principle planning challenges. Accordingly, the Housing policies of the Plan identify affordability targets stating that planning activities will serve to provide for both a mixture of dwelling types and integrated mixtures of housing affordability. In pursuit of this goal, the policies of the Plan identify bonusing as a planning tool in support of the provision of affordable housing in planning and development proposals.

Block 139 is located on the northeast corner of Killally Road and Edgevalley Road. Block 139 is part of a larger, comprehensively planned and recently registered plan of subdivision that provides for a range of housing options including low, medium and high-rise residential built forms (see Attachment 1b) Plan 33M-757). As noted in the Planning Justification Report, the proposed development will provide "... a diversity in affordability and unit types." The Planning Justification Report notes the site's proximity to commercial uses, open space and public transit infrastructure (including Route 25 with direct connections to the Huron/Highbury community shopping area node, Fanshawe College, and Masonville Place).

The locational attributes of the site and the inclusion of barrier-free units directly align with the guidelines and considerations used by HDC to advance affordable housing. HDC would further note that a review of housing analytics from the Canada Mortgage and Housing Corporation (CMHC) indicate average apartment vacancy rates and rents in the defined area demonstrating housing affordability challenges.

The recommended bonus zone is specific to the mid-rise apartment buildings identified as Buildings "B" and "C" on Block 139 on lands known municipally as 475 Edgevalley Road and does not apply to any other development or development phase by any perceived similarity in lift or built form.

Conclusion:

Section 37 of the Planning Act provides municipalities the ability to advance public services in exchange for additional height and density above existing zoning permissions. The ability to utilize this important tool as a mechanism to advance affordable rental housing aligns with a critical need in London, noting that London is currently ranked 5th in Canada for the highest percentages of households in "Core Housing Need" in major urban centres. (CMHC, July 2018).

This recommendation recognizes Council's expressed interest to seek "... options for implementing and coordinating [planning] tools to be most effective..." to "...promote the development of affordable housing in London" (4.4/12PEC, July 25, 2018)

HDC will be available to the Planning and Environment Committee and to Civic Administration to further inform this recommendation or respond to any associated questions.

*Urban Design - June 28, 2019*

Urban design staff have reviewed the site plans, elevations, and the urban design brief that form part of the Zoning By-law Amendment application for the above noted address and provide the following urban design related comments consistent with the Official Plan, applicable by-laws and guidelines:

- Site design comments regarding "Block 139" & "Block 140"
  - Create a consistent street wall along the Killally Road frontage by including a maximum setback of 4m for the proposed buildings.
  - Create a consistent street wall along the Edge Valley Road frontage by including a maximum setback of 5m
  - Ensure any parking located next to the street, between buildings, is located behind the face of the building(s). Include a min. 5m setback for

parking areas along Killaly Road and a min. 6m setback for parking areas along Edge Valley.

- Through the Site Plan Process include;
  - A combination of low masonry walls (max. 0.7m in height) and landscaping in areas where parking is adjacent to the street in order to screen this function and provide a built edge;
  - Ensure the parking area is designed to meet the Parking Lot design requirements of the Site Plan Control By-Law in particular as it relates to landscape islands;
  - Ensure an appropriately sized and located amenity space is located on site.
- Building Design
  - Ensure that all buildings are oriented to their respective street frontages with a well-defined entrance facing the street;
  - Ensure the design of the buildings "A" and "B" on both blocks have regard for their corner locations and ensure that the design of both street facing facades include a high level of architectural detail.
  - Provide for individual unit entrances for ground floor units, explore opportunities to include ground floor courtyards with direct access to the city sidewalk in order to create an active street edge.

*Site Plan - July 11, 2019*

General Comments:

1. Zoning referral form will be completed once finalized zoning has been established on the site.
2. The site contains an h, and h-54 holding provision to be removed prior to site plan application approval.
3. Isolate site plan for each site separately to avoid confusion in the future.
4. Noise study recommendations shall be implemented through a future development agreement.
5. Parkland dedication has been taken as part of the registered subdivision application. No additional concerns.
6. There are no heritage planning or archaeological issues related to this property and associated file.

Site Plan Comments:

1. Bicycle parking referenced on the site plan but not shown. Please provide relevant floor plan at next submission depicting long term bicycle storage location. Note stall size shall be in compliance with section 14 of the site plan control bylaw.
2. Identify internal garbage rooms on the site plan as well as pick-up staging area. Provide note on the plans regarding garbage and recycling strategy.
3. Identify snow storage areas on the site plans.
4. Provide barrier free stall and signage design detail on the plans.
5. Provide fire route signage and design detail of signage on the plans.
6. Identify visitor parking stalls on the site plan in compliance with the site plan control bylaw (1 per 10 dwelling units).
7. As per section 6.2 (b) of the SPCB, parking areas should be no closer than 3 metres to street line and 1.5 metres to a property line. Please clarify on the site plan.

Landscape Comments:

1. Three (3) metre wide double tree planted islands to be provided at the end of each parking area in accordance with Section 9 of the Site Plan Control By-law.
2. Landscape drawings are to be endorsed and signed by a qualified OALA or Arborist.

Building Design Comments:

As this proposal requires a Zoning By-law Amendment (ZBA), further discussions relating to the design of the site, the buildings in regards to their heights, massing, step-

backs, relationship to surround existing and planned development, may occur through that process.

Site design comments submitted to the applicant through the ZBA are as follows;

- Create a consistent street wall along both the Killally Road and Edge Valley Road frontage.
- Ensure any parking located next to the street, between buildings, is located behind the face of the building(s). Include a min. 5m setback for parking areas along Killally Road and a min. 6m setback for parking areas along Edge Valley.
- Provide a combination of low masonry walls (max. 0.7m in height) and landscaping in areas where parking is adjacent to the street in order to screen this function and provide a built edge;
- Ensure the parking area is designed to meet the Parking Lot design requirements of the Site Plan Control By-Law in particular as it relates to landscape islands;
- Ensure an appropriately sized and located amenity space is located on site.
- Building design comments submitted to the applicant through the ZBA are as follows;
- Ensure that all buildings are oriented to their respective street frontages with a well-defined entrance facing the street;
- Ensure the design of the buildings "A" and "B" on have regard for their corner locations and ensure that the design of both street facing facades include a high level of architectural detail.
- Provide for individual unit entrances for ground floor units, explore opportunities to include ground floor courtyards with direct access to the city sidewalk in order to create an active street edge

Engineering Comments:

Development Services - Engineering has completed its review of the first submission of engineering drawings prepared by Strik Baldinelli Moniz (SBM) and submitted as part of the above noted site plan application. Items to be addressed are outlined below and identified on the attached red-lined drawings.

Technical Comments for the Applicant  
480 (Block 140) Edgevalley Rd

1. Dimension accesses (min 6.7 width, min curb radii 6.0m).
2. A section 28 permit will be required for 480 Edgevalley Road.
3. Although this area was included in the design of a downstream stormwater management facility, the proposed parking lot for high density residential buildings is required to address water quality to the standards of the MECP and the satisfaction of the City Engineer.
4. The ultimate outlet for this site will be the Kilally South West stormwater management facility. This pond is not yet built, the consultant is to discuss the site outlet prior to pond construction.
5. A conditional approval has not been granted. The outlet sewers are not approved.
6. Drawings C6 indicates that the OLFR is to over top the west edge of the parking lot before flowing north via a swale to Agathos Street. The report is to demonstrate capacity of the swale to safely convey flows and confirm that flows will not impact the westerly adjacent properties.
7. Provide and label the 100yr limits and elevations. Note the max ponding depth and ensure pipes are designed for the 2-yr event.
8. Provide an outline of the proposed works/ESC measures during different site conditions. Indicating the sequential order from perimeter protection, grading of diversion swales, site stripping, sewer construction, pre-grading, site stabilization and post servicing. Be sure to note if any material (topsoil, fill, etc) will be stored on site or hauled off site. The servicing report should support the proposed ESC measures.
9. There is an automatic flushing device located on Block 140, this device shall not be impacted by the development and shall remain accessible by the City. Easements may be required.

10. Retaining wall design and grading alternatives including building locations to be discussed.

When all comments as set-out above and on the red lined mark-up have been addressed in their entirety the drawings could be resubmitted for our review.

*London Hydro - June 23, 2019*

Servicing the above proposal should present no foreseeable problems. Above-grade transformation is required.

Note: Transformation lead times are minimum 16 weeks.

Contact Engineering Dept. to confirm requirements & availability.

## Appendix C – 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:

### Provincial Policy Statement

#### 1.1 Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns

1.1.1 a, b, c, e, f

#### 1.1.3 Settlement Areas

1.1.3.1, 1.1.3.2, 1.1.3.3, 1.1.3.4, 1.1.3.6

#### 1.4 Housing

1.4.1

#### 1.6.7 Transportation Systems

1.6.7.4

### London Plan

Our Strategy: 59\_5.; 59\_7.; 61\_2.

Our City: \*71\_Figure 1; \*72\_; 107\_; 108\_; 124\_; 142\_; 143-145\_; \*146\_; 170\_; 172\_

City Building: \*193\_;\*197\_; \*199\_; \*202\_; \*211\_; \*213\_; \*217\_; \*218\_; \*219\_; \*220\_; 221-228\_; 229\_; 230\_; 235\_; 236\_; 237\_; 238\_; 249\_; 252\_; 253\_; \*255\_; 256\_; \*259\_; \*261\_; \*266\_; 268\_; 269\_; \*270\_; \*271\_; \*272\_; \*277\_; \*278\_; \*279\_; \*280\_; \*281\_; \*282\_; \*284-300\_; \*301; \*302\_; \*304\_; \*370-372\_; \*Table 6; .520\_; 521\_

Place Type Policies: \*916-922; \*Table 10; \*935\_; \*936\_; \*Table 11; \*960\_;

Our Tools: 1576\_; \*1577-1578\_; 1610\_; \*1638-1647\_

Maps: \*Map 1; \*Map 3

### 1989 Official Plan

Chapter 2 Planning Framework: 2.3.1 ii); 2.3.1 vii);

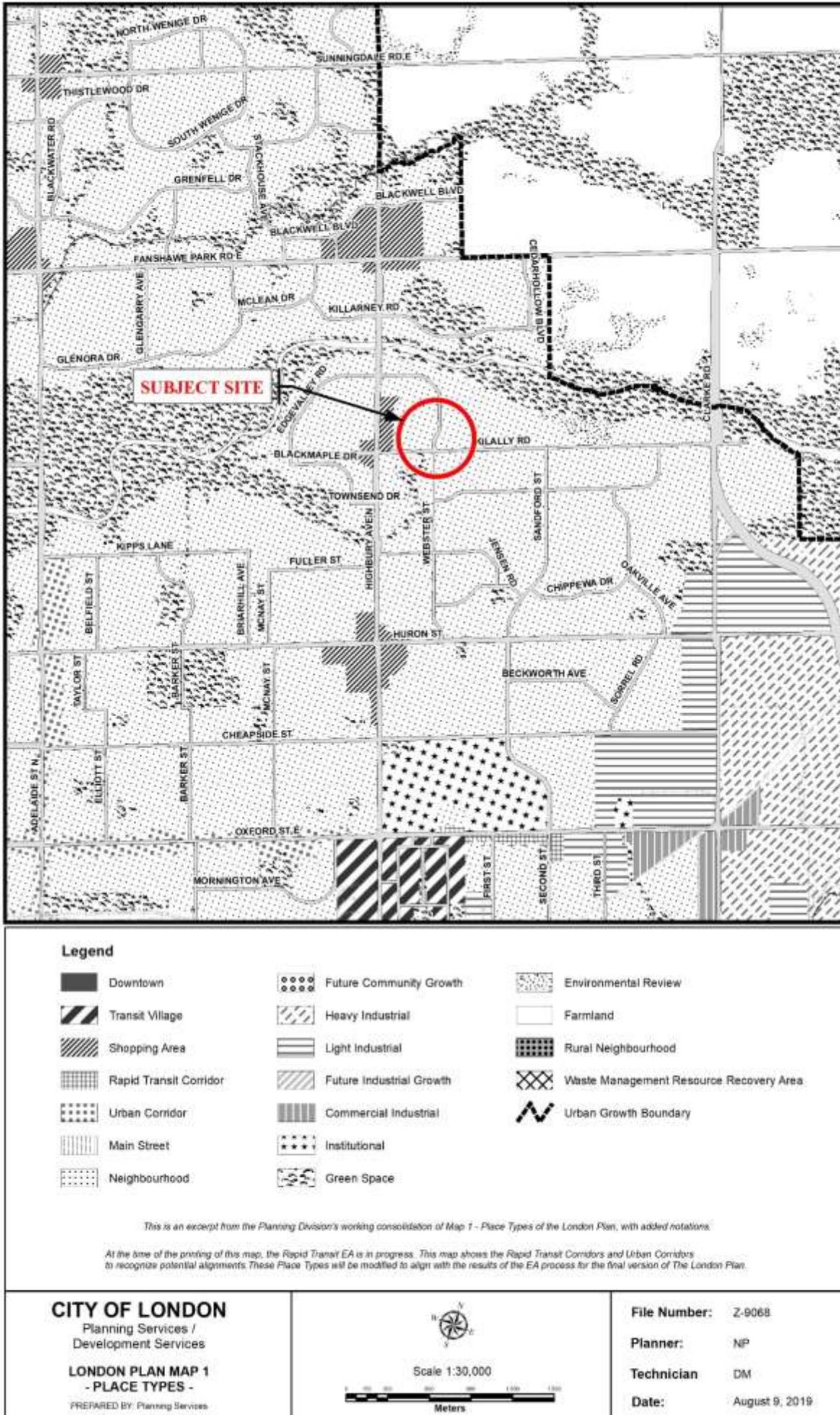
Chapter 3 Residential Land use Designations: 3.1.1 ii); 3.1.1 v); 3.3.1; 3.3.3 i); 3.3.3 ii);

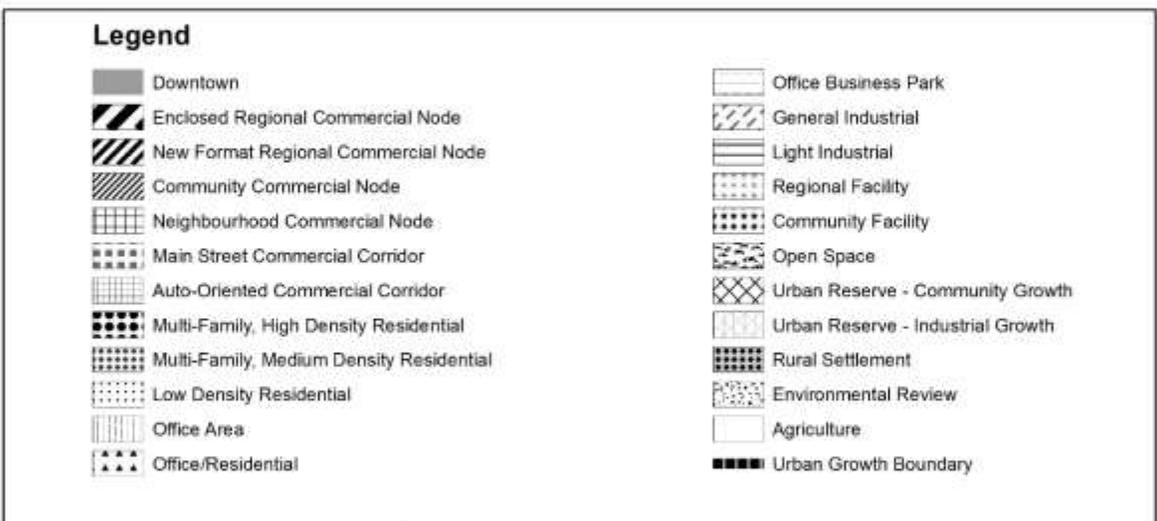
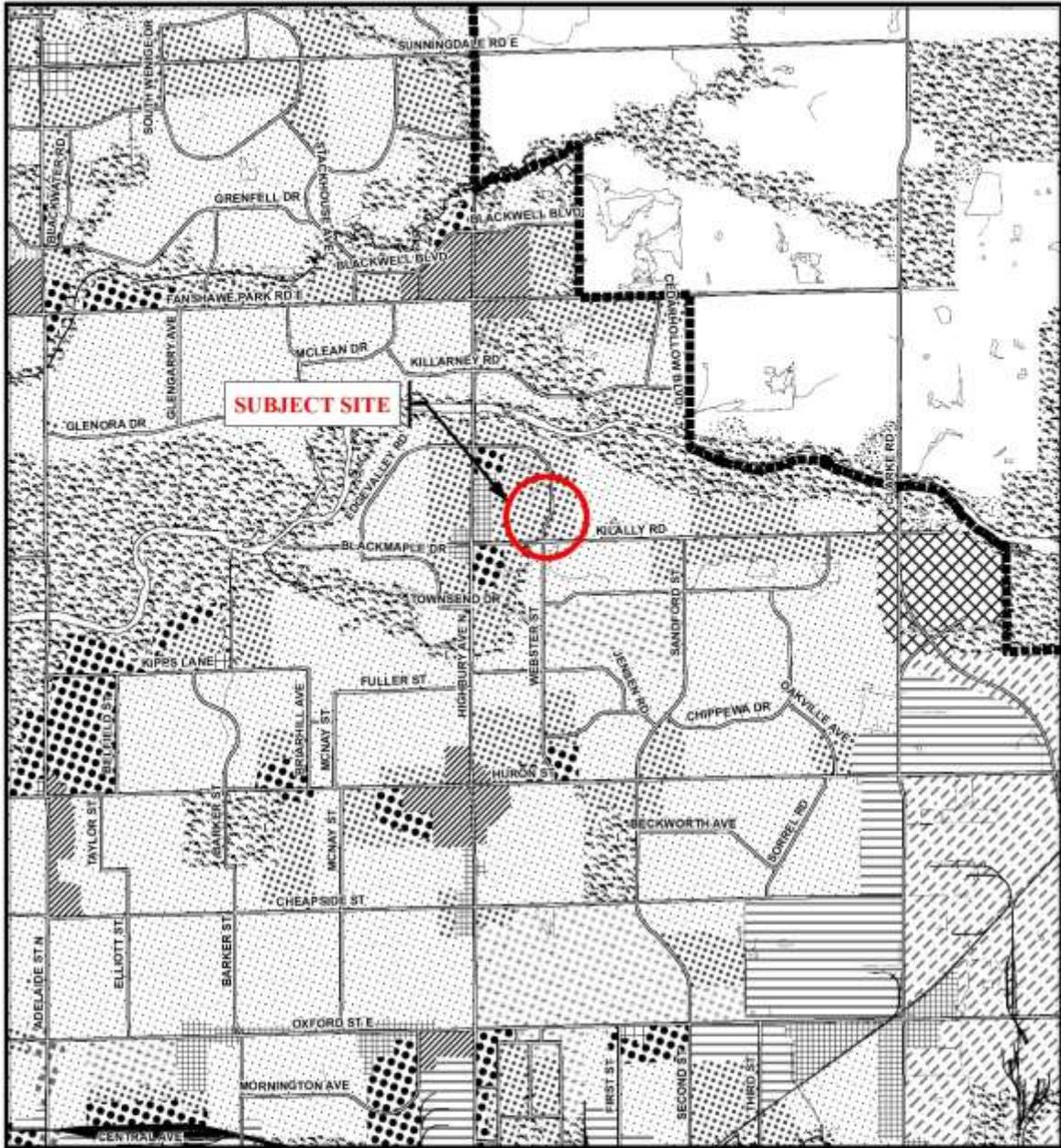
Chapter 11 Urban Design Principles: 11.1.1 v); 11.1.1 viii); 11.1.1xiii); 11.1.1 xiv); 11.1.1 xvii); 11.1. xxi)

Chapter 19 Implementation: 19.2.2.; 19.4; 19.4.4.; 19.9.2

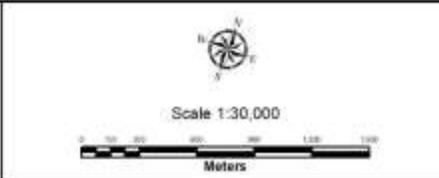
**Appendix D – Relevant Background**

**Additional Maps**





**CITY OF LONDON**  
 Department of  
 Planning and Development  
 OFFICIAL PLAN SCHEDULE A  
 - LANDUSE -  
 PREPARED BY: Graphics and Information Services



FILE NUMBER: Z-9068  
 PLANNER: NP  
 TECHNICIAN: DM  
 DATE: 2019/08/09



## Additional Reports

**November, 1990** - Report to Planning Committee on Kilally Road Area Study and subsequent adoption of Official Plan amendments.

**June, 2003** - – Report to Planning Committee to provide an update on the Kilally Road Area Study and amend the Official Plan.

**July, 2005** - Report to Planning Committee to delete the aggregate resource designation from Schedule B of the Official Plan (O-6899)

**February, 2006** - Report to Planning Committee to recommend approval of the draft plan of subdivision and associated zoning by-law amendments (39T-05505/Z-6897)

**March, 2009** - Report to Planning Committee to recommend a three year extension to the draft approved plan of subdivision (39T-05505)

**December, 2011** - Report to Built and Natural Environment Committee to recommend a revised draft plan of subdivision and associated zoning by-law amendments (39T-05505/Z-7942)

**June 15, 2015** – Report to Planning Committee to recommend a one year extension to the draft approved plan of subdivision, with a two year extension to be done administratively (39T-05505)

**September 6, 2016** – Report to Planning Committee to recommend a revised zone for the high density block within the draft plan (Z-8618)

**January 8, 2018** - Report to Planning and Environment Committee on Special Provisions for the Subdivision Agreement (39T-05505)

**January 21, 2019** - Report to Planning and Environment Committee on removal of holding provisions for the subdivision (H-8892)

## Bibliography

### Request for Approval:

City of London Zoning By-law Amendment Application Form, completed by Drelo Holdings Inc., May 3, 2019.

### Reference Documents:

Ontario. Ministry of Municipal Affairs and Housing. *Planning Act, R.S.O. 1990, CHAPTER P.13*, as amended.

Ontario. Ministry of Municipal Affairs and Housing. *Provincial Policy Statement*, March 1, 2005.

City of London. *The London Plan*, December 28, 2016, as amended.

City of London. *Official Plan*, June 19, 1989, as amended.

City of London. *Zoning By-law No. Z.-1*, May 21, 1991, as amended.

Drewlo Holdings Inc., *475 & 480 Edgevalley Road Planning Justification Report, Site Plan and Renderings*, April 30, 2019

Drewlo Holdings Inc., *475 & 480 Edgevalley Road Urban Design Brief*, April 3, 2019.

Correspondence: (all located in City of London File No. Z-9068 unless otherwise stated)

Deller, K., London Hydro. Memo to N. Pasato. June 22, 2019

Giustizia, S., Housing Development Corporation, London – Letter on HDC Comments to M. Tomazincic and N. Pasato. June 24, 2019

Smolarek J., Development Services - Memo on Urban Design Comments to N. Pasato. June 28, 2019

FitzGerald, D., Development Services - Letter on Site Plan Control for 480 Edgevalley Road. London ON – File Number SPA19-060 to C. O'Brien, July 11, 2019

Other:

Site visit August 7, 2019

Public correspondence listed in Appendix B of report