# **Report to Planning and Environment Committee**

To: Chair and Members

**Planning & Environment Committee** 

From: G. Kotsifas P. Eng.,

Managing Director, Development & Compliance Services and

**Chief Building Official** 

Subject: Shana'a Holdings Inc.

260 Sarnia Road

Date: December 14, 2020

# Recommendation

That, on the recommendation of the Director, Development Services, with respect to the application of Shana'a Holdings Inc. relating to the property located at 260 Sarnia Road, the proposed by-law attached hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting on January 12, 2021 to amend Zoning By-law No. Z.-1, in conformity with the Official Plan, to change the zoning of the subject property **FROM** a Residential R1 (R1-9) Zone, **TO** a Residential R8 Special Provision (R8-4 (\_)) Zone.

# **Executive Summary**

#### **Summary of Request**

The applicant is requesting an amendment to Zoning By-law Z.-1 to rezone the lands known municipally as 260 Sarnia Road (the "subject lands") from a Residential R1 (R1-9) Zone, which permits single detached dwellings, to a Residential R8 Special Provision (R8-4 (\_)) Zone to permit 8, 2- and 3-storey stacked back-to-back townhouse units at a density of 55 units per hectare. Additional Special Provisions are requested to permit 9 parking spaces, whereas 12 parking spaces are required, and a 0.0 m front yard setback, whereas a minimum front yard setback of 7.0 m is required.

#### **Purpose and the Effect of Recommended Action**

The purpose and effect of the recommended Zoning By-law amendment is to permit a 2- and 3-storey stacked back-to-back townhouse development with a total of 8 units at a density of 55 units per hectare. The recommended change will permit 1 parking space per unit for a minimum of 8 parking spaces and a minimum front yard setback of 1.0 m.

### **Rationale of Recommended Action**

- 1. The requested amendment is consistent with the policies of the Provincial Policy Statement, 2020 that encourage efficient development and land use patterns that support the use of transit and active transportation where it exists.
- 2. The recommended amendment conforms to the in-force policies of The London Plan including but limited to the Key Directions, City Design policies, and Neighbourhoods Place Type policies that contemplate townhouses as a primary permitted use where the property has frontage on a Civic Boulevard.
- 3. The requested amendment conforms to the Residential Intensification policies of The London Plan and the 1989 Official Plan which direct intensification to ensure that character and compatibility with the surrounding neighbourhood is maintained. The subject lands represent an appropriate location for Residential Intensification, within the Built-Area Boundary and Primary Transit Area, along a higher-order street at the periphery of an existing neighbourhood. The recommended amendment would permit development at an intensity that is appropriate for the site and the surrounding neighbourhood.

4. The requested amendment is consistent with the policies for Near Campus Neighbourhoods in The London Plan and the 1989 Official Plan, insofar as the site is unique within its context and has special attributes that warrant a sitespecific amendment to permit the proposed form and intensity of development. As well, the site can reasonably accommodate the use, intensity and form of the proposed use.

# **Analysis**

# 1.0 Background Information

### 1.1. Property Description

The subject lands are located on the south side of Sarnia Road, between Coombs Avenue to the west and Western Road to the east. Surrounding uses include low density residential uses immediately to the south and west of the subject lands, and a 5-storey student residence building and parking area immediately to the east. The site is situated within walking distance of the Western University (UWO) main campus, located northeast of Sarnia Road and Western Road.

The site is currently occupied by a 1.5-storey converted dwelling operating with 2 Residential Rental Units (RRU) for a total of 7 bedrooms, a detached accessory structure (garage), and a U-shaped driveway that extends across the front yard. The existing structures are proposed to be demolished in order to facilitate the proposed development.

Front view of the subject lands (facing south on Sarnia Road)



Figure 1. Front view of the subject lands (facing south on Sarnia Road)

The subject lands slope generally from north to south (rear), with a number of trees and vegetation planted along the east and south (rear) property line.



Figure 2. Rear view of the subject lands (facing southeast, towards UWO student residence)



Figure 3. Rear view of the subject lands (facing southwest)

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

- Official Plan Designation Low Density Residential (Near-Campus Neighbourhoods Area)
- The London Plan Place Type Neighbourhoods (Near-Campus Neighbourhoods Area)
- Existing Zoning Residential R1 (R1-9)

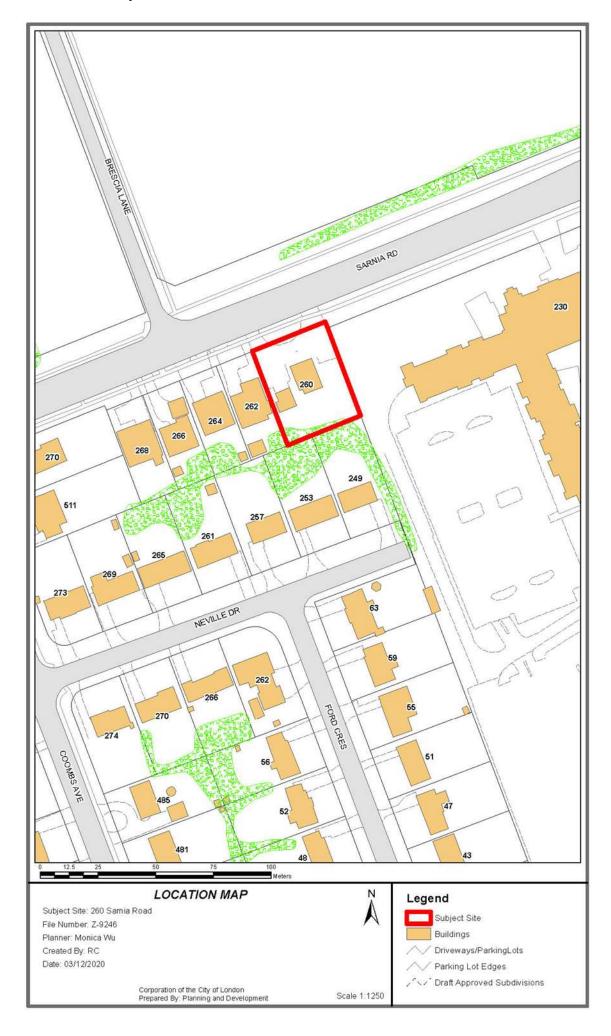
### 1.3. Site Characteristics

- Current Land Use Single detached dwelling
- Frontage 34.1 metres
- Depth 43.5 metres
- Area 1,483.6 square metres
- Shape Rectangular

# 1.4. Surrounding Land Uses

- North Vacant Land Designated RF and Zoned Residential R1, Brescia University College Campus parking lot (OZ-7955) and future residence building
- West Single-detached dwellings
- East 5-storey UWO student residence building
- South Single-detached dwellings

# 1.5 Location Map



#### 1.6 Intensification

The proposed residential development represents intensification within the Built-Area Boundary and is located within the Primary Transit Area.

# 2.0 Description of Proposal

#### 2.1 Development Proposal

#### Original Site Concept Plan (June 9, 2020)

The site concept plan, preliminary building concept, and elevations submitted in support of the requested amendment shows a 2-storey, 8-unit stacked back-to-back townhouse development oriented towards Sarnia Road (Figures 4 & 5). Each unit has a total gross floor area (GFA) of approximately 1050 square feet, and can accommodate a maximum of 3 bedrooms per unit, for a total of 24 bedrooms. The proposed building is setback 1.0 m from the right-of-way, taking into account a 5.2 m road widening dedication. Driveway access is provided off of Sarnia Road by a 6.7 m wide driveway flanking the west lot line, and a 4.5 m wide pedestrian walkway is located along the easterly lot line, which connects to Sarnia Road. 8 parking spaces are provided at the rear of the subject lands, including 1 barrier-free parking space located at the southwest corner of the site, and 9 bicycle parking spaces. Both private and common amenity areas are proposed, including an outdoor amenity area with a gazebo and patio located at the southeast corner of the site, and private balconies facing the streetscape and towards the rear. The proposed development will result in the removal of the rear yard vegetation located on-site. Boundary trees on adjacent properties are to be retained and protected during the construction period, and new trees are to be planted as part of the development.



Figure 4. Original Site Concept Plan (June 9, 2020)





Figure 5. South and East Elevations

# 1st Revision - Site Concept Plan (October 21, 2020)

Following feedback received from City staff, who requested clarification regarding the front yard setback and expressed concerns relating to the proposed number of parking spaces, the applicants submitted a revised concept, which was presented to the Urban Design Peer Review Panel on October 21, 2020 with the following changes (Figures 6 & 7):

- Addition of 2 parking spaces for a total of 10 parking spaces, including 1 barrierfree parking space which has been moved closer to the rear units at the southeast corner of the site;
- To account for the required 19.5 meter road widening dedication along Sarnia Road, the proposed townhouse cluster will need to be setback an additional 4.2 meters from the front lot line. The recommended front yard setback of 1.0 m will be maintained.
- As a result of the road widening dedication, the applicants have proposed to shift the building back and reduce the building footprint of the rear units while adding an additional storey at the rear. The additional storey will be restricted to the rear portion of the building, with the front portion of the building maintaining a height of 2-storeys. The ground floor units at the rear (units 3 and 4) will have a GFA of approximately 640 square feet; units 7 and 8, which are also located at the rear, will be located on the 2<sup>nd</sup> and 3<sup>rd</sup> storeys, for a total GFA of 1420 square feet. No major changes are proposed to the units fronting onto Sarnia Road.
- The reduction in gross floor area for units 3 and 4 will result in a corresponding reduction in the proposed number of bedrooms, with 1 bedroom proposed for each unit. In total, 18 bedrooms are proposed, representing a reduction of 6 bedrooms from the initial proposal.





Figure 6. South and East Elevations



Figure 7. Proposed Site Concept Plan (October 21, 2020)

# 2<sup>nd</sup> Revision – Current Site Concept Plan (November 1, 2020)

Following feedback received from Urban Design Peer Review Panel (UDPRP) on October 21, 2020, the applicants submitted a second revised concept with the following changes (Figures 8 & 9):

- Reduction of 1 parking spaces for a total of 9 parking spaces, including 1 barrierfree parking space;
- Reduction of the driveway width from 6.7 m to 4.5 m, with additional landscaping and a retaining wall proposed along the west lot line.



Figure 8. Current Renderings (Sarnia Road Perspective & Rear Parking Lot Perspective)



Figure 9. Current Site Concept Plan (November 1, 2020)

### 3.0 Relevant Background

### 3.1 Planning History

- 2012: The applicant submitted an application for Zoning By-Law amendment (Z-8075) to rezone the lands to a Residential R3 Zone (R3-3) to permit the construction of a fourplex dwelling, and to demolish the existing dwelling and detached garage. The request for amendment was refused by Municipal Council and subsequently appealed to the OMB, where the decision of Council was upheld (PL121328).
- 1991: An application for an Official Plan and Zoning By-law Amendment was received (OZ-4400) to change the designation of the lands from Low Density Residential to a Multi-Family Medium Density Residential Designation and rezone the lands to Residential R5-4/CF1 to permit six townhouses or alternatively a group home Type 2 at 260 Sarnia Road (different applicant). The application was refused and was subsequently appealed to the OMB. The appeal was eventually withdrawn.

# 3.2 Requested Amendment

The applicant is requesting an amendment to Zoning By-law Z.-1 to change the zoning of the subject lands from a Residential R1 (R1-9) Zone, which permits the use of the subject lands for one single-detached dwelling, to a Residential R8 Special Provision (R8-4 (\_)) Zone to permit 8, 2- and 3-storey stacked back-to-back townhouse units for a total density of 55 units per hectares. Special provisions are requested to permit site-specific exceptions to the standard R8 (R8-4) Zone regulations. The applicant is requesting a reduced front yard setback and a reduced number of parking spaces.

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

Staff received (5) comments during the public consultation period, which will be addressed under Section 4 of this report. The comments can be summarized as follows:

- 8 parking spaces are insufficient for 24 bedrooms;
- Traffic impacts on Wonderland Road North;
- Concerns about water run-off towards the neighbouring property at the rear;
- Potential light pollution impact from the parking lot towards the neighbouring property at the rear;
- The proposed density is too intense for the area;
- There is inadequate infrastructure in the northwest part of the City to support the development;
- The front yard setback is inconsistent with setbacks of buildings in the surrounding area and will limit the future widening of Sarnia Road;
- Clarification regarding the proposed number of bedrooms;
- Support of the application from a neighbouring property owner based on the proximity to UWO, frontage along Sarnia Road, and location next to the student residence

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

#### **Provincial Policy Statement, 2020**

The *Provincial Policy Statement, 2020* (PPS) provides policy direction on matters of provincial interest related to land use planning and development. In accordance with Section III of the PPS, the PPS is intended to be "read in its entirety and the relevant policies are to be applied to each situation".

The PPS encourages healthy, livable and safe communities which are sustained by accommodating an appropriate range and mix of residential, employment and institutional uses to meet long-term needs (Section 1.1.1 b)). The PPS also directs planning authorities to identify appropriate locations and promote opportunities for transit-supportive development and accommodating a range of housing options through residential intensification (Section 1.1.3.3).

#### The London Plan

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

The subject lands are located within the Neighbourhoods Place Type on \*Map 1 – Place Types of The London Plan, with frontage on a Civic Boulevard (Sarnia Road) as identified on Map 3 – Street Classifications. The Neighbourhoods Place Type contemplates a broad range of residential uses for the subject lands in accordance with Table 10 – Range of Permitted Uses including, but not limited to single-detached, semi-detached, duplex and converted dwellings, triplexes, fourplexes, townhouses, stacked townhouses and low-rise apartments. \*Table 11 – Range of Permitted Heights requires a minimum height of 2-storeys and contemplates a maximum height of 4-storeys for the subject lands (or up to 6-storeys through Bonusing).

Consideration has also been given to the general policies of the Our Strategy, Our City, City Building and Design, Neighbourhoods Place Type, and Our Tools sections.

Near-Campus Neighbourhood Policies

The subject lands are located within a Near-Campus Neighbourhood (NCN) in proximity to Western University as identified on \*Map 7 – Specific Policy Areas of The London Plan, and Figure 3-1 "Near-Campus Neighbourhoods Area" of the 1989 Official Plan,

and are therefore subject to the NCN policies in both plans. The vision for NCNs is to plan these areas in a manner that enhances their livability, diversity, vibrancy, culture, sense of place, and quality of housing options for all residents (Policy 964\_; Section 3.5.19.2.). The planning goals for NCN direct Residential Intensification to occur in a proactive, coordinated, and comprehensive fashion within low density residential neighbourhoods near Western University and Fanshawe College (Policy 965\_1; Section 3.5.19.4. ix)). The NCN policies may permit Residential Intensification within low density residential neighbourhoods subject to criteria listed under Policy 968\_ in The London Plan and Section 3.5.19.10 in the 1989 Official Plan.

#### Official Plan (1989)

The subject lands are designated Low Density Residential in accordance with Schedule 'A' of the 1989 Official Plan. The Low Density Residential designation is applied to lands that are primarily developed or planned for low-rise, low density forms of housing, including detached, semi-detached, and duplex dwellings (Section 3.2). Multiple-attached dwellings may also be permitted subject to the policies of the 1989 Official Plan (Section 3.2.1.).

The proposed development of the subject lands meets the definition of redevelopment, as described in Section 3.2.3.1. of the 1989 Official Plan, and is therefore subject to the Residential Intensification policies therein. Residential Intensification may be permitted in the Low Density Residential designation through an amendment to the Zoning Bylaw, subject to Official Plan policies and the Planning Impact Analysis policies (Section 3.2.3.), up to a density of 75 units per hectare (Section 3.2.3.2.).

# 4.0 Key Issues and Considerations

#### 4.1 - Issue and Consideration # 1: Use & Intensity

#### 4.1.1 Use and Intensity

Provincial Policy Statement, 2020 (PPS)

Section 1.1 of the PPS encourages healthy, livable and safe communities which accommodate an appropriate range and mix of uses to meet long-term needs (Section 1.1.1 b)), and are sustained by promoting efficient, cost-effective development patterns and standards to minimize land consumption and servicing costs (Section 1.1.1 e)). The PPS encourages settlement areas to be the main focus of intensification and redevelopment (Section 1.1.2). Appropriate land use patterns within settlement areas are established by providing appropriate densities and mix of land uses that efficiently use land and resources, and the surrounding infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed (Section 1.1.3.2).

The policies of the PPS direct planning authorities to identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated, taking into account existing building stock or areas, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs (Section 1.1.3.3). Planning authorities are further directed to permit and facilitate all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes (Section 1.4.3 b) 1.). The PPS encourages all types of residential intensification, including additional residential units and redevelopment (Section 1.4.3 b) 2.).

### **Analysis**

The recommended amendment is consistent with the policies of the PPS as it will facilitate efficient, cost-effective development patterns within an established settlement area. The proposed development represents a form of intensification through

redevelopment and the creation of additional residential units. The proposed 2- and 3- storey, 8-unit townhouse development supports the Province's goal to achieve a more compact, higher density form of development, and will contribute to providing choice and diversity in housing options required to meet the health, economic and well-being requirements of current and future residents, including the surrounding student population. No new roads or infrastructure are required to service the site; therefore the development makes efficient use of existing services. The proposed development supports the use of active transportation and transit as the site is conveniently located in an area that is directly serviced by existing transit, and is located within a 10-minute walking distance to the UWO main campus.

### The London Plan

The London Plan encourages intensification where appropriately located and provided in a way that is sensitive to and a good fit within existing neighbourhoods (Policy 83\_, 937\_, and 953\_1). The intensity of development must be appropriate to the neighbourhood context as it relates to height, massing, setbacks etc. (Policy 953\_2), as well as appropriate for the size of the lot, and accommodate such things as adequate parking in appropriate locations, landscaped open space, outdoor residential amenity area etc. (Policy 953\_3). As well, the subject lands are located in the Primary Transit Area (PTA), which is intended to be the focus of residential intensification and transit investment within London (Policy 90\_). Development within the PTA should be designed to be transit-oriented, and the supply of public parking within the PTA will be managed to support the transit and active mobility networks (Policy 92\_8, 92\_9)

The Neighbourhoods Place Type contemplates a broad range of residential uses for the subject lands in accordance with Table 10 – Range of Permitted Uses, including stacked townhouses. The London Plan uses height as a measure of intensity in the Neighbourhoods Place Type. A minimum height of 2-storeys and a maximum height 4-storeys (up to 6-storeys with bonusing) is contemplated in the Neighbourhoods Place Type where a property has frontage on a Civic Boulevard (\*Table 11 – Range of Permitted Heights in the Neighbourhoods Place Type).

#### Near-Campus Neighbourhoods Policies

The planning and urban design goals set out in the NCN policies in The London Place (Policy 365\_) and the 1989 Official Plan (Section 3.5.19.4.) are intended to serve as an additional evaluative framework for all planning applications within NCN. They include:

- Planning for residential intensification in a proactive, coordinated, and comprehensive fashion;
- Identifying strategic locations where residential intensification is appropriate within NCNs and which use strong transit connections to link these opportunities to campuses;
- Avoiding incremental changes in use, density, and intensity that cumulatively lead to undesirable changes in the character and amenity of streetscapes and neighbourhoods;
- Encouraging a balanced mix of residential structure types at appropriate locations while preserving stable residential areas;
- Encouraging residential intensification in mid-rise and high-rise forms of development;
- Directing residential intensification to significant transportation nodes and corridors and away from interior neighbourhoods;
- Utilizing zoning to allow for residential intensification which is appropriate in form, size, scale, mass, density, and intensity;
- Ensuring that residential intensification projects incorporate urban design qualities that enhance streetscapes and contribute to the character of the neighbourhood while respecting the residential amenity of nearby properties.

Within the NCN, Residential Intensification may be permitted within low density residential neighbourhoods subject to the criteria listed under Policy 968\_ in The London Plan and Section 3.5.19.10 in the 1989 Official Plan, including that:

- the development provides for adequate amenity area;
- mitigation measures are incorporated which ensure surrounding residential land uses are not negatively impacted;
- the proposal does not represent a site-specific amendment for a lot that is not unique within its context and does not have any special attributes;
- the proposal is appropriate in size and scale and does not represent overintensification of the site; and
- the proposal establishes a positive and appropriate example for similar locations in the NCN areas.

Policy 969\_ further discourages forms of intensification within NCNs that:

- are inconsistent with uses and intensity shown in Tables 10 to 12 of The London Plan;
- are within neighbourhoods that have already absorbed significant amounts of residential intensification and/or residential intensity;
- are located on inadequately sized lots that do not reasonably accommodate the use, intensity or form of the proposed use;
- contain built forms that are not consistent in scale and character with the neighbourhood;
- continue an ad-hoc and incremental trend towards residential intensification within a given street, block or neighbourhood.

#### Official Plan (1989)

The Low Density Residential designation is applied to lands that are primarily developed or planned for low-rise, low density housing forms (Section 3.2.). Where appropriate, the designation permits some multiple-attached dwellings, such as row houses or cluster houses, subject to the policies of the 1989 Official Plan (Section 3.2.1.). Residential Intensification may be permitted in the Low Density Residential designation through an amendment to the Zoning By-law, subject to the Residential Intensification policies and the Planning Impact Analysis policies (Section 3.2.3.), and will be considered in a range up to 75 units per hectare (Section 3.2.3.2.). Infill housing may be in the form of single detached dwellings, semi-detached dwellings, attached dwellings, cluster housing and low rise apartments (Section 3.2.3.2).

#### **Analysis**

The recommended amendment would facilitate the development of a 2- and 3- storey stacked back-to-back townhouse development with density of 55 units per hectare. The proposed use of the subject lands is permitted under Table 10 – Range of Permitted Uses of The London Plan and conforms to the permitted height range contemplated at this location (\*Table 11 – Range of Permitted Heights), as well as the maximum density contemplated in the 1989 Official Plan (Section 3.2.3.2.). As such, the requested intensity of development is contemplated on the subject lands, subject to certain considerations at the Site Plan Approval stage.

With regards to issues relating to compatibility and good fit with the surrounding neighbourhood, the following subsections will address concerns regarding on-site parking, light pollution, potential stormwater impacts on the lands to the south, and inadequate infrastructure, below:

# On-Site Parking/Light Pollution

Comments were received during circulation concerning the proposed reduction in parking spaces and potential light pollution impacts on the neighbouring property to the south.

Section 4.19 (10) (b) of Zoning By-law Z.-1 provides standard parking rates for specific residential uses based on the number of proposed dwelling units. The applicant is proposing to provide 9 parking spaces, including 1 accessible parking space, whereas 12 parking spaces are required based on a total of 8 residential units (1.5 parking spaces per unit). Transportation objectives in the 1989 Official Plan direct that parking facilities be provided that are appropriately located, adequate for the uses that they support, and compatible with adjacent land uses (1989 Official Plan, Section 18.1 ix)).

In this instance, the proposed parking area is appropriately located at the rear of the subject lands and will be buffered/screened from view of the neighbouring residential properties to the south and west by existing fencing and mature trees on the neighbouring property at the rear. A 1.5 m landscaping strip with additional trees and vegetation is proposed along the southerly and westerly lot lines, further mitigating potential noise or lighting impacts of the parking area on the neighbouring properties.

The subject lands are located within walking and cycling distance to the UWO main campus, and are on a direct bus route (on Sarnia Road), which may reduce demand for parking on-site at this particular location. It is anticipated that the proposed building will be marketed toward students of Western University and is therefore not unreasonable to consider the use of the building by tenants who do not require access to a motorized vehicle. Furthermore, City Transportation staff supports the reduction in required parking at a rate of 1 parking space per unit, and have no concerns with respect to traffic.

As such, the proposed parking reduction is consistent with the PTA policies in The London Plan and is adequate for the uses they support. The proposed parking area is

appropriately located, and given the proposed mitigation measures, is not anticipated to have any negative impacts on neighbouring lands. Further mitigation measures, such as the location of trees proposed along the rear lot line and parking area lighting, will be considered at the Site Plan Approval stage.

#### Wastewater and Stormwater Impacts

As part of a complete application, the applicant was required to provide a Sanitary Servicing Report to assess sufficient sanitary capacity and a Stormwater Management Report with lot grading plan indicating how the site is proposed to be serviced.

Sanitary servicing is to be provided via the existing sanitary connection to the 200mm sanitary sewer on Sarnia Road. Following their review of the MTE Sanitary Servicing Brief completed on April 21, 2020, City Engineering Staff provided comments requesting revisions to the design sheets that provide a more conservative estimate that includes the population coming from University Residential and connected to the Ford Crescent sanitary sewer as well as the Brescia lands. Based on the density being proposed, City Engineering staff do not anticipate any issues with the marginal increase in sanitary flows once the above changes are made. A detailed design capacity analysis will be undertaken and the sanitary area plan and design sheets will be updated to the satisfaction of Wastewater Drainage Engineering and the City Engineer at the time of Site Plan Approval. Approval will not be granted for development if it will be inadequately serviced by the design solution.

In addition, City design standards for stormwater management do not support designs that will increase pre-to-post-development runoff and overland flow onto adjacent properties. Following their review of the MTE Stormwater Management Report completed on April 21, 2020, City Engineering staff provided comments requesting revisions to the strategy to address the site's topography, and additional detail of the proposed outlet. Staff will be seeking on-site design solutions at the Site Plan Approval stage that maintain or reduce post-development overland flow and where possible, improve flow patterns.

### Near-Campus Neighbourhoods Policies

The surrounding neighbourhood can be characterized by low-rise, low density residential uses in the form of single detached dwellings, which are located on relatively large lots with significant depth and mature vegetation. Several properties within the surrounding neighbourhood are licensed as residential rental units, including the two properties situated immediately west of the subject lands, which contain 7 to 8 bedrooms each. There has been a moderate increase in Residential Intensification and Intensity in the surrounding area over time, as well as within the University Heights neighbourhood to the south.

The subject lands have a lot area of approximately 1,660.0 m², with a lot frontage and a lot depth of approximately 34.0 m and 44.0 m, respectively. The lot depth is consistent with that of surrounding properties; in contrast, the lot frontage is approximately twice that of nearby residential lots along the south side of Sarnia Road, which average 17.0 m. The abutting uses to the south (rear) and west of the subject lands contain a single detached dwelling and a converted dwelling, respectively. Immediately to the east of the subject lands is a 5-storey UWO student resident building and associated parking area. Directly north of Sarnia Road are lands owned by Brescia College, which are currently undeveloped. The subject lands are uniquely situated next to a 5-storey student residence with a wider lot frontage than the average observed lot frontage in the surrounding neighbourhood. Furthermore, the subject lands are located along a transit corridor, away from the interior of the neighbourhood. Based on these unique attributes, it is not unreasonable to consider a site-specific amendment for Residential Intensification at this location.

The proposed development is strategically located on a major transit route along Sarnia Road (routes 9, 10, 29, and 31), which connects directly to UWO main campus and to

commercial areas located along Wonderland Road North. Bus stops are located approximately 150.0 m to the east of the subject lands, and 100.0 m to the west. As indicated above, the UWO main campus is approximately a 10-minute walking distance from the subject lands. While there are no dedicated cycling lanes along Sarnia Road, the main campus is easily accessible by bike via Sarnia Road and Philip Aziz Avenue.

Adequate amenity space is provided in the form of shared outdoor amenity space, located at the southeast corner at the site, which includes a pergola and paved patio area, and private amenity space for each unit. The outdoor amenity space is adequately buffered/screened from the properties to the south and east by existing fencing and a 1.5 m landscaped strip and vegetation, thereby mitigating potential noise and visual impacts on the neighbouring properties. Further site layout and design issues will be considered at the Site Plan Approval stage.

The applicant is providing a sufficient amount of landscaped open space (36% whereas a minimum of 30% is required), a rear yard amenity space, and with the exception of the minimum on-site parking and front yard setback requirements, complies with all other regulations in the Zoning By-law. The lot is adequately sized as the intensity of development is balanced with other site functions and surrounding properties should not be adversely impacted. As such, the proposed 8-unit stacked back-to-back townhouse development is appropriate in size and scale and does not represent over-intensification of the site.

#### 4.2 - Issue and Consideration #2: Form

# Provincial Policy Statement, 2020

The PPS is supportive of development standards which facilitate intensification, redevelopment and compact form (Policy 1.1.3.4). The PPS also identifies that long term economic prosperity should be supported by encouraging a sense of place by promoting a well-designed built form, and by conserving features that help define character (Policy 1.7.1 e)).

#### The London Plan

The London Plan encourages compact forms of development as a means of planning and managing for growth (Policy 7\_, Policy 66\_), and encourages growing "inward and upward" to achieve compact forms of development (Policy 59\_ 2, 79\_). The London Plan accommodates opportunities for infill and intensification of various types and forms that take advantage of existing services and facilities (Policy 59\_ 4.). Where appropriate, transit-oriented development forms are encouraged (Policy 60\_6).

Within the Neighbourhoods Place Type, and according to the urban design considerations for Residential Intensification, compatibility and fit will be evaluated from a form-based perspective through consideration of the following: site layout in the context of the surrounding neighbourhood; building and main entrance orientation; building line and setback from the street; height transitions with adjacent development; and massing appropriate to the scale of the surrounding neighbourhood (\*Policy 953\_ 2. a.-f.). Similar to the Planning Impact Analysis criteria within the 1989 Official Plan, the Our Tools section of The London Plan contains various considerations for the evaluation of all planning and development applications (\*Policy 1578\_).

# Official Plan (1989)

Regarding the scale of development in areas designated Low Density Residential, development shall have a low-rise, low coverage form that minimizes problems of shadowing, view obstruction and loss of privacy (Section 3.2.2.). The 1989 Official Plan recognizes Residential Intensification as a means of providing for the efficient use of land and achieving a compact urban form (Section 3.2.3). In accordance with Section 3.2.3.2 of the 1989 Official Plan, Zoning By-law provisions are to ensure that infill housing projects recognize the scale of adjacent land uses and reflect the character of

the area. The Planning Impact Analysis criteria in the 1989 Official Plan, are to be used to evaluate the appropriateness of a proposed change in land use and identify ways to reduce any adverse impacts on surrounding land uses (Section 3.7).

Furthermore, Residential Intensification projects shall use innovative and creative urban design techniques to ensure that character and compatibility with the surrounding neighbourhood is maintained (Section 3.2.3). In addition to the NCN policies provided under section 4.1 of this report, section 3.5.19.13. of the 1989 Official Plan provides additional urban design criteria for new development in the NCN used to evaluate consistency with existing neighbourhood built form patterns, such as height, roof slope and shapes, scale, massing, building orientation, amongst others.

#### <u>Analysis</u>

Low-rise, low density residential uses in the form of single detached dwellings built in the 1950s and 60s are the dominant forms of development in the surrounding neighbourhood. The existing lot fabric in the surrounding area can be characterized as relatively large lots with significant lot depths. The existing dwellings in the area are setback substantially from the right-of-way, with a significant portion of the front yards dedicated to front yard parking on extended paved areas. In some instances, attached garages have been renovated to be part of the residential living space.

The Our Tools policies of The London Plan direct decision makers to evaluate a development proposal against the existing context as well as the future context envisioned by policy to allow for flexibility in managing change within an established neighbourhood. (\*Policy 1578\_7). As previously indicated, the proposed 2- and 3-storey, 8-unit stacked back-to-back townhouse development conforms to The London Plan policies as it relates to use (Table 10 – Range of Permitted Uses) and height (\*Table 11 – Range of Permitted Heights), as well as the maximum density contemplated in the 1989 Official Plan (Section 3.2.3.2.). And while it introduces a new form of development within the existing context, it represents the future form of development envisioned by the polices for lands along the Sarnia Road frontage.

The proposed location of the parking area at the rear of the property is an improvement over existing site conditions, where the parking area currently fronts onto Sarnia Road. The parking area will be appropriately screened from the street, which will positively contribute to the visual aesthetic of the streetscape and surrounding neighbourhood. The proposed building design is oriented towards Sarnia Road, with units 1, 2, 5, and 6 facing the street. Given the proposed front yard setback of 1.0 m, the ground floor of the proposed townhouse development would be at a similar grading along Sarnia Road, which would improve the existing grade relationship. In contrast, the existing dwelling appears to be "depressed" into the ground, due to the topography of the site and the existing 10.0 m setback from the right-of-way.

Additional contemporary architectural elements are incorporated in the design to create visual interest along the streetscape. The roof line will be sloped to reflect the dominant sloped roof features of the surrounding bungalows, but with a distinctive "split peaked roof" and columns at the periphery, which provides a more "free and floating" impression.

# Front Yard Setback

Concerns were raised through the circulation of the application that the proposed front yard setback was not appropriate for the context of the neighbourhood. The requested amendment includes a reduced minimum front yard setback of 0.0 m, whereas 7.0 m is required in the Residential R8 (R8-4) Zone. A reduction in the front yard setback is required as a result of the ultimate road allowance requirement of 19.5 m measured from the centreline of Sarnia Road. Relief from the required minimum front yard setback of 7.0 m is required in order to provide reasonable townhouse unit sizes while ensuring that adequate parking and outdoor amenity space can be provided at the rear of the subject lands.

The proposed front yard setback reduction reflects current urban design standards in *The London Plan*. Buildings are encouraged to be positioned with minimal setbacks from public rights-of-way to create a street wall/edge that provides a sense of enclosure within the public realm (\*Policy 259\_), and to encourage transit-oriented development (Policy 90\_). Comments received from the Urban Design Peer Review Panel (UDPRP) were supportive of the building orientation towards Sarnia Road, including the principle unit entrances to units 1, 2, 5, & 6, creating an active street edge. Furthermore, the proposed building setback maintains a similar front yard setback as the existing dwelling located 5 properties west of the subject lands, on the corner lot at the intersection of Sarnia Road and Coombs Avenue.

Based on the submitted and revised site concept plans, a front yard setback of 1.0 m is shown, with landscaping proposed within the 1.0 m setback. The applicant should be encouraged at the Site Plan Approval stage to provide additional plantings within the available space to soften the appearance of the new building from the streetscape. As such, the requested Special Provision for a reduced parking area setback of 0.0 m is not necessary to facilitate the proposed development. It is recommended that the requested Special Provision be revised to 1.0 m, as shown on the site concept plan.

### Height and Scale

As a result of the required 19.5 m road widening dedication along Sarnia Road, the applicants have proposed a further reduction in the GFA of the rear-facing units, resulting in an additional storey being added to the rear units. In total, 4 units are provided at the rear: units 3 and 4 located on the ground floor with a gross floor area of 640 sq. ft. each, and units 7 and 8 located on the 2<sup>nd</sup> and 3<sup>rd</sup> storeys with a combined gross floor area of 1420 sq. ft. each.

Due to the proposed location of the parking area and driveway, adequate rear yard and west side yard depths are provided from the abutting properties to the south (rear) and west of the subject lands, which alleviates concerns with respect to overlook/privacy and shadowing resulting from the proposed increase in height. Additionally, the subject lands are sloped as the site move towards the rear; as a result of the grading difference, only a portion of the 3<sup>rd</sup> storey peaked roof can be viewed from the streetscape.

In regards to the surrounding context, the abutting property to the east of the subject lands contain a 5-storey student residence; in contrast, the abutting properties to the south and west of the subject lands contain a single-story residential dwelling. The proposed 2- and 3-storey stacked townhouse development provides an appropriate transition in height and scale from the medium-high density development to the east, to the low-density residential neighbourhood to the south and west.

Based on the above analysis, the proposed 2- and 3-storey stacked back-to-back townhouses represent a more compact form of development than the existing converted dwelling on the subject lands, and improves on the visual characteristics of the surrounding neighbourhood, particularly as it relates to the streetscape. The proposed development provides an appropriate transition from the medium-high density development to the east and the low-density residential neighbourhoods to the west and south. Development Services staff are of the opinion that the proposed development serves as a positive and appropriate example for similar locations in the NCN areas.

# Conclusion

The recommended amendment to permit 8, 2- and 3-storey stacked back-to-back townhouse units is consistent with the policies of the Provincial Policy Statement, 2020 and conforms to the in-force policies of The London Plan, including the use, intensity, and form polices within the Neighbourhoods Place Type, as well as the 1989 Official Plan.

The recommended amendment is consistent with the Near-Campus Neighbourhoods

policies in The London Plan and the 1989 Official Plan, which encourage intensification in medium and high density forms, and discourage continued intensification in low density forms of housing. The proposed development is located on an appropriately-sized lot that can reasonably accommodate the use, intensity, and form of the proposed use. The site is uniquely situated next to a 5-storey student residence with a wider lot frontage than the average observed lot frontage in the surrounding neighbourhood, and is situated along a transit corridor, away from the interior of the neighbourhood, where higher density can be accommodated. Based on these unique attributes, a site-specific amendment for Residential Intensification at this location is reasonable, and serves as a positive and appropriate example for similar locations in the NCN areas.

Prepared by: M. Wu, Planner I, Development Services

Submitted by: Paul Yeoman, RPP PLE, Director, Development Services

Recommended by: George Kotsifas, P.ENG, Managing Director,

**Development and Compliance Services and Chief** 

**Building Official** 

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 Planning Services

December 7, 2020 CS/

CC: Michael Tomazincic, Manager, Development Planning

# **Appendix A**

Bill No.(number to be inserted by Clerk's Office) 2021

By-law No. Z.-1-21\_\_\_\_\_

A by-law to amend By-law No. Z.-1 to rezone an area of land located at 260 Sarnia Road.

WHEREAS Kirkness Consulting has applied to rezone an area of land located at 260 Sarnia Road, as shown on the map attached to this by-law, as set out below;

AND WHEREAS this rezoning conforms to the Official Plan;

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 260 Sarnia Road, as shown on the attached map comprising part of Key Map No. A102, from a Residential R1 (R1-9) Zone to a Residential R8 Special Provision (R8-4(\_)) Zone.
- 2) Section Number 9.4 of the Residential R8 (R8-4) Zone is amended by adding the following Special Provision:

R8-4(\_) 260 Sarnia Road

a) Regulations

i) Front Yard Depth 1.0 metres (3.2 feet) (minimum)

ii) Parking 1 space per unit (Minimum)

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.

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. P13, either upon the date of the passage of this by-law or as otherwise provided by the said section.

PASSED in Open Council on January 12, 2021.

Ed Holder Mayor

Catharine Saunders City Clerk

First Reading – January 12, 2021 Second Reading – January 12, 2021 Third Reading – January 12, 2021

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



# **Appendix B – Public Engagement**

### **Community Engagement**

**Public liaison:** On August 5, 2020, Notice of Application was sent to all property owners with 120 m of the property. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on August 6, 2020. A "Planning Application" sign was also posted on the site.

**Nature of Liaison:** The purpose and effect of this zoning change is to permit a 8, 2-storey stacked back-to-back townhouse dwellings. Possible change to Zoning By-law Z.-1 **FROM** a Residential R1 (R1-9) Zone **TO** a Residential R8 Special Provision (R8-4 (\_)) Zone with a 0.0 minimum front yard setback and 8 parking spaces whereas 12 parking spaces are required.

**Public liaison:** On November 25, 2020, Notice of Public Meeting was sent to all property owners within 120 m of the property. Notice of Public Meeting was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on November 26, 2020.

Responses: Five (5) comments were received (see below).

The cluster townhomes already along sarnia are an eyesore, the density is way too high and they increase the wonderland road traffic which is already to heavy. Why on earth would the city of london even consider allowing another development of cluster homes. The zoning should not be changed to allow this development. The infrastructure in the northwest cannot support it.

#### J. Blackport

I have concerns with the proposed Zoning amendment for the property at 260 Sarnia Rd.

My concerns are as follows:

- The Notice of Planning Application sent out by the City of London did not specify/guarantee the number of bedrooms proposed in this 8 plex, why was this? how are we to make a decision on this proposal without all the details.
- I am also concerned about the proposal to greatly reduce the reduced front yard setback. This can be shortsighted and thus limiting of potential Sarnia Road expansion in future years.
- This 8 plex will probably host a minimum of 24 tenants likely Western Students, as that is who is currently living on the site. (unknown maximum # due to details of # of bedrooms withheld) realistically 8 parking spaces are not sufficient for 24 students. Parking should be increased to a minimum of 16 spaces for this proposal.
- For years the City of London has dragged out their old excuses of why we should limit infill in residential neighbourhoods, you even make By-Laws and City Zoning to try and stop this, now you are retracting all these concerns for this property, why?

I would like to be notified of any meeting for the proposed Zoning By Law Amendment.

Dan Schaefer

Shana'a Holdings Inc made an application for zoning amendment which was denied by Council and the Appeal was heard by the Ontario Municipal Board on May 13, 2013. OMB Case No: PL121328, OMB File No: PL121328. At that time the request was for a 4-plex to be built on the property, and the amendment was not approved. Instead it was recommended to build two duplexes. I had thought the matter closed and was surprised to see another application.

Having reviewed the notice of planning application, this new amendment proposes a cluster townhouse development consisting of 8, 2-storey stacked back to back townhouse units with parking spaces and a reduced font yard setback.

I live in my home on 249 Neville Drive, where I have resided for 25 years. My back yard is immediately south of 260 Sarnia Rd and contains the spruce trees which are viewed from that property as it looks south.

My home is a side split in a neighbourhood comprised of mainly bungalows and one other side split home like mine.

The current building at 260 Sarnia Road is set back from the main road and is a 2-storey building. By moving the proposed new building forward and closer to Sarnia Road, the 2-storeys will be at a higher elevation and will appear much higher from my home which is already at a lower level of gradation as the land slopes significantly downwards from that property to mine. With this in mind, I am very concerned about water runoff from this new elevation and fencing should this amendment go forward. There exists the potential of a parking lot full of headlights assaulting my home with light pollution as cars enter the driveway and park, I would suggest that a concrete fence (minimum 8 ft) be required at the rear of that property to prevent this and not reliance on the heavy vegetation of the spruce trees in my yard. This type of fence will also prevent litter from the garbage area being scattered and contain the patio area. It will provide a clear boundary between our yards. Additionally, any lighting for the parking area should point from the back of the parking lot and to the north, east or west to prevent light pollution into my home.

Please advise me of future public participation meetings should this move forward.

Please send notification on the decision of the City of London on the proposed zoning by-law amendment.

Thank you,

Mary Hryb 249 Neville Drive London ON

Hi Ms. Wu

Can you tell me how many bedrooms will be in each townhouse at the proposed development at 260 Sarnia Rd?

According to the City Notice, there would be 8 townhouses and I am assuming there is a restriction of 3 bedrooms per townhouse.

Is this correct?

Thank you

Glenn Matthews Housing Mediation Officer Western University

Room 3C62 Ontario Hall 519-661-3787

Monica,

As owner of 279 Sarnia road, I am 100% in agreement and have no objections with this proposal for above stated property.

It does makes sense as this area in close proximity to UWO and fronting onto Sarnia road to develop sites likes these for cluster housing.

Especially directly next door to a hi rise that Western built a few years ago.

I also agree with the owner of the property to ask for SPECIAL REVISIONS to permit this building on site.

Regards,

Marco Palumbo.

President, Palumbo Properties Ltd.

Owner of 279 Sarnia road.

> Dear Phil,

>

- > I received the information about the proposed plans to build 8, 2 Storey Stacked Back to Back townhouses on the site of 260 Sarnia Rd. in London.
- > I am intrigued to know more details of this development.
- > For as you must know, Back to Back houses were built in the UK during the Industrial Revolution to provide accommodations for the rapid rise in population in the manufacturing cities, such as the inner cities of Leeds, Liverpool, Birmingham etc.
- > They were terraced houses built on the cheap and shared a back wall and common courtyard.
- > This led to unsanitary, unhealthy slum like conditions.
- > Thankfully most of them were demolished in the latter 19th century and a bit later.
- > A few have been preserved in Birmingham operated as a historical museum.

>

- > I hope it is correct to assume that the plans for housing at 260 Sarnia Rd. will not resemble, in any way, those built during the Industrial Revolution.
- > But, you must admit that the term Back to Back Houses does conjure up images of the horrendous housing conditions for some of the population in a bygone era.
- > I look forward to your comments.
- > Thank you.

>

> Sincerely,

>

> Lorna Brooke

# **Agency/Departmental Comments**

### Site Plan

 8 parking spaces are provided, whereas 12 are required. This is problematic, in that 1 of the provided spaces (as required) is shown as barrier-free. If none of the future residents have an accessible parking permit, then the space isn't allowed

to be used for tenant parking and one of the tenants will be without a parking space.

- I also note that the accessible parking space must be located as close to the building as possible, and comply with the design standards of the Site Plan Control By-law, including a painted walkway and barrier-free path of travel to the building entrances.
- The required front yard is 7m. The plans submitted show a setback of 1m, and the PJR states it to be 0m.
- The building height should be confirmed as the average of all 4 corners of the building given the grade change from front to rear.
- Details are required for the accessory structure (gazebo) in the rear yard, including the height (to the peak of the roof), setback to the property lines, and lot coverage.
- The rear yard parking area setback should be shown as a minimum of 1.5m.
- Additional comments may be forthcoming depending on the information requested above.

### **Engineering**

### **Transportation**

- Road dedication is 19.5m from the centerline along Sarnia Road as per the Z1;
- Detailed comments regarding the access will be provided at time of Site Plan

#### <u>Water</u>

· No comments.

### **Stormwater**

- SWM's team stresses the need to comply with comments provided as part of preapplication comments for above site.
- In order to properly review a swm strategy that addresses the sites topography, lack of storm sewer and detail of the proposed outlet, a comprehensive submission is required. Designer shall ensure to utilize Figure 5.3 for the post development time of concentration ensuring a more conservative design is put forward.

# Sewer

- The sanitary sewershed is Greenway.
- The consultant engineer indicate that the footprint of the site is 0.15ha; however, In the design sheet it is indicated as 0.25ha, revise accordingly.
- The Applicant's engineer is to revise the design sheet and use 230l/cap/day for only the proposed site. The rest of the Blocks/Lots has to be as per old design sheet (cap/day). Alternatively, the whole design sheet be calculated a bit more conservatively, perhaps 250l/cap/day.
- The Applicant's engineer shall ensure to account for the population coming from University Residential and connected to the Ford Cresent sanitary sewer. Revise report and design sheet accordingly.
- Although Brescia is not connected or contributing any flows at the present time, Applicant's engineer shall account for their lands similar to previous design sheets.
- SED expectation that the some sections will have some limited capacity and may be under surcharge condition; however, based on the minor density being proposed, SED is not overly concern about the capacity once the above changes are made.
- The applicant's engineer is to re-submit the revised sanitary capacity analysis for review as well as address all SED comments.
- Transportation comments provided as part of the pre-application stage still apply to the site at the time of SPA.

#### **UTRCA**

 As indicated, the subject lands are not regulated by the UTRCA and a Section 28 permit application will not be required. The UTRCA has no objections to this application.

#### **UDPRP**

- The Panel commends the applicant for a well considered approach to the site considering the restrictions created by the road widening allowance.
- The Panel questioned the percentage asphalt relative to the remainder of the site and recommended auditing the drive aisle widths and number parking spaces to maximize the amount of landscaped and amenity space.
- The Panel recommended the plant selection be chosen with the student occupants in mind to ensure ease of maintenance and long term aesthetics along Sarnia Road.

# **Appendix B – Policy Context**

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

### **Provincial Policy Statement, 2020**

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

1.1.1 b)

1.1.3.1

1.1.3.2

1.1.3.3

1.1.3.4

1.4.3

Section 1.7 – Long Term Economic Prosperity

### The London Plan

(Policies subject to Local Planning Appeals Tribunal, Appeal PL170100, indicated with asterisk.)

Policy 7\_ Our Challenge, Planning of Change and Our Challenges Ahead, Managing the Cost of Growth

Policy 59\_2., 4., and 5. Our Strategy, Key Directions, Direction #5 Build a Mixed-use Compact City

Policy 61\_5. Our Strategy, Key Directions, Direction # 7 Build Strong, Healthy and Attractive Neighbourhoods for Everyone

Policy 66\_ Our City, Planning for Growth and Change

Policy 79\_ Our City, City Structure Plan, The Growth Framework, Intensification

\*Policy 83\_ Our City, City Structure Plan, The Growth Framework, Intensification

Policy 84\_ Our City, City Structure Plan, The Growth Framework, Intensification

Policy 256\_City Building Policies, City Design, How Are We Going to Achieve This, Site Layout

\*Policy 259\_ City Building Policies, City Design, How Are We Going to Achieve This, Site Layout

Table 10 Range of Permitted Uses in Neighbourhoods Place Type

\*Table 11 Range of Permitted Heights in Neighbourhood Place Type

\*Policy 919\_ Place Type Policies, Urban Place Types, Neighbourhoods, Approach for Planning Neighbourhoods – Use, Intensity and Form

\*Policy 937\_ Place Type Policies, Urban Place Types, Neighbourhoods, Residential Intensification in Neighbourhoods

\*Policy 939\_ Place Type Policies, Urban Place Types, Neighbourhoods, Forms of Residential Intensification

\*Policy 953\_ Place Type Policies, Urban Place Types, Neighbourhoods, Residential Intensification in Neighbourhoods, Additional Urban Design Considerations for Residential Intensification

### Official Plan (1989)

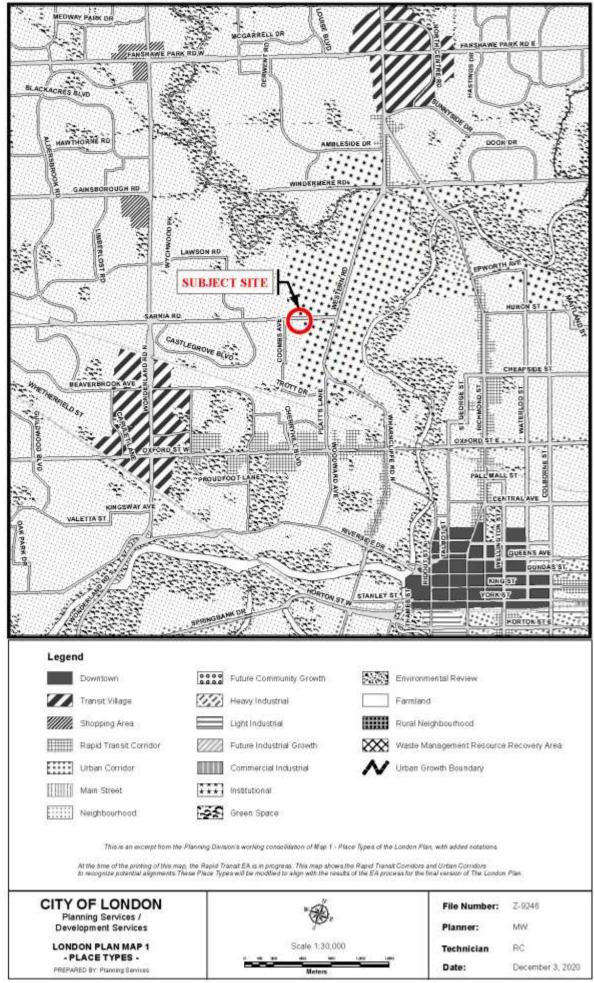
General Objectives for All Residential Designations

- 3.1.1 ii)
- 3.2.3.2 Residential Intensification, Density and Form
- 3.2.3.4 Compatibility of Proposed Residential Intensification Development Low Density Residential Designation
- 3.3 Preamble
- 3.3.1 Permitted Uses
- 3.3.2 Scale of Development
- 3.3.3 Residential Intensification
- 3.7 Planning Impact Analysis
- 3.7.2 Scope of Planning Impact Analysis
- 3.7.3 Required Information

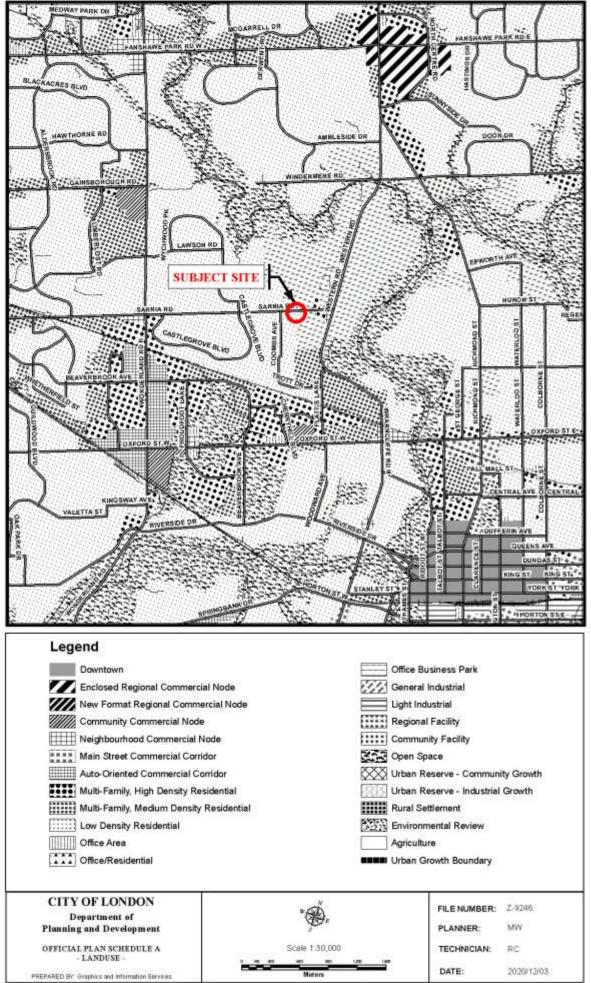
# Appendix C – Relevant Background

### **Additional Maps**

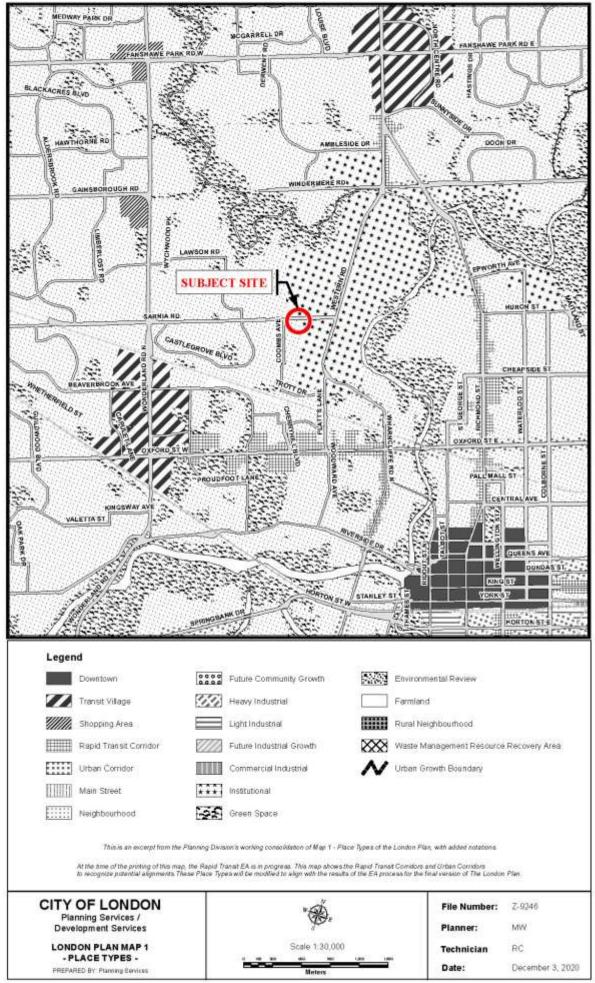
# **London Plan Designation**



# Official Plan Designation



# **Existing Zoning**



 $Project Location: E1Planning Project sip\_official plan work consol 00 kexcerpts\_London Plan 1 mxds 12-9246 - Map 1-Place Types. mxd$ 

