

## Report to Planning and Environment Committee

**To:** Chair and Members  
Planning & Environment Committee  
**From:** Scott Mathers, MPA, P.Eng.  
Deputy City Manager, Planning and Economic Development  
**Subject:** Housing Development Corporation, London  
18 Elm Street  
**Date:** July 25, 2022

## Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of Housing Development Corporation, London relating to the property located at 18 Elm Street:

- (a) the proposed by-law attached hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting on August 2, 2022 to amend The London Plan **TO** add a special policy to Map Special Policy Areas applicable the subject lands, and **TO** add a special policy to the Neighbourhoods Place Type applicable to the subject lands;
- (b) the proposed by-law attached hereto as Appendix "B" **BE INTRODUCED** at the Municipal Council meeting on August 2, 2022 to amend Zoning By-law No. Z.-1, in conformity with The London Plan as amended in part (a) above, to change the zoning of the subject property **FROM** a Neighbourhood Facility (NF) Zone **TO** a Residential R8 Special Provision Bonus (R8-4( )•B( )) Zone; and a Open Space 1 Special Provision (OS1( )) Zone;
- (c) It being noted that the applicant applied to amend the Official Plan, 1989; however, that Official Plan has subsequently been repealed.

## Executive Summary

### Summary of Request

The request is for a specific policy area within The London Plan and a zoning amendment, which includes a bonus zone at 18 Elm Street to provide for a four storey 41-unit mixed use apartment building with community uses at grade.

### Purpose and the Effect of Recommended Action

The recommended action provides for the development as proposed through:

1. A specific policy within The London Plan to allow for a mixed use apartment building with community uses at grade, up to 4-storeys in height subject to a bonus zone.
2. A base zone to allow community uses and an apartment building up to 13.0m in height.
3. A bonus zone to allow up to 100uph and 14.5m in height subject to the provision of a minimum of 800 sq. m. of community uses.

### Rationale of Recommended Action

1. The proposed amendment is consistent with the PPS, 2020 through the provision of affordable housing on an infill site which makes efficient use of existing infrastructure;
2. The proposed amendment conforms to the policies of The London Plan, including but not limited to the key directions and general vision policies of the Neighbourhoods Place Type; and,

3. The proposed amendment would conform to the requested policies of the Multi-Family – Medium Density Residential designation were the Official Plan, 1989 not repealed and the requested amendment made.

## Analysis

### 1.0 Site at a Glance

#### 1.1 Property Description

The site is a 0.79 ha former school site which is vacant following demolition of the former school building. Frontage is provided along Elm Street, which has a street classification of Neighbourhood Street and that is located 290m east of the Hamilton, Egerton and Trafalgar intersection. The abutting residential uses are one to two-storeys in height. The nearest park is Silverwoods Park a 300m walk to the north and east.

Immediately to the south of the subject lands is Hamilton Road, which is a street classification of Civic Boulevard and the spine of an Urban Corridor Place Type. The abutting property contains a place of worship (specifically the Holy Cross Santa Cruz church). This urban corridor contains a variety of commercial uses and has recently undergone a comprehensive zoning study which established a Business District Commercial zoning framework to support mixed use development along the corridor.

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

- The London Plan Place Type – Neighbourhoods
- 1989 Official Plan Designation – Low Density Residential
- Existing Zoning – Neighbourhood Facility (NF) Zone

#### 1.3 Site Characteristics

- Current Land Use – Undeveloped
- Frontage – 110m
- Depth – 73m
- Area – 7,952 sq.m.
- Shape – Rectangular

#### 1.4 Surrounding Land Uses

- North – Low density residential (primarily single detached)
- East – Low density residential (primarily single detached) and a municipal laneway along the northern portion
- South – Place of worship and commercial corridor uses
- West – Low density residential (primarily single detached)

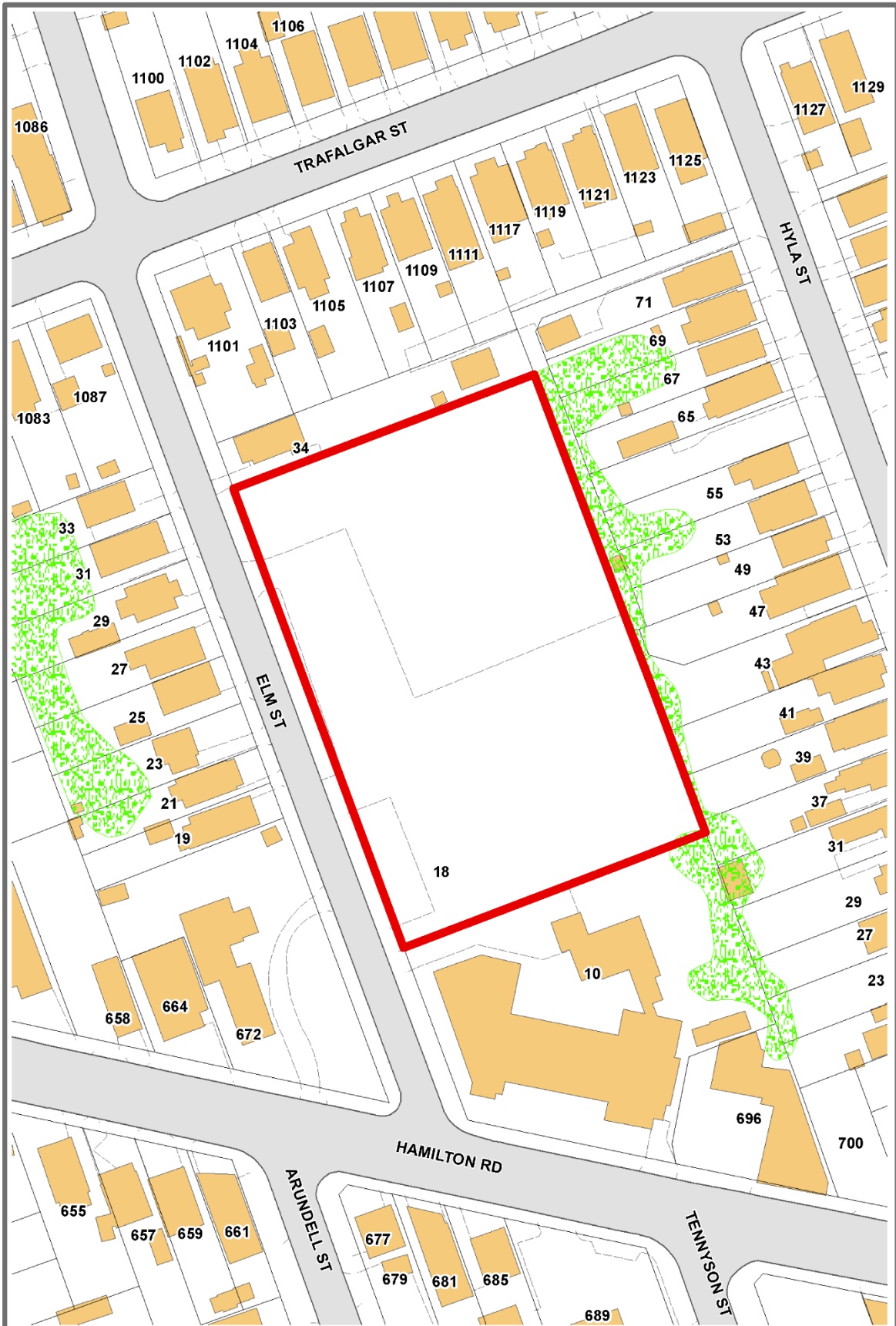
#### 1.5 Intensification

- The proposal provides for 42 units of intensification within the built area boundary.

#### 1.6 Affordable Housing

- The proposal provides for 42 units of affordable housing.

# 1.7 Location Map



### LOCATION MAP

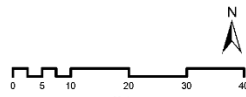
Subject Site: 18 Elm Street

File Number: OZ-9496

Planner: Leif Maitland

Date: 2022/03/06

Corporation of the City of London  
Prepared By: Planning and Development



Scale 1:1000

### Legend

- Subject Site
- Assessment Parcels
- Buildings
- Driveways/Parking Lots

## 2.0 Description of Proposal

### 2.1 Development Proposal

The development proposal is for a 42 unit-apartment 4-storey mixed-use building with community facility and daycare uses at grade. The development relies on a partnership with Ontario Aboriginal Housing Services (OAHS) to implement an Indigenous-led approach that will offer affordable rents, wraparound tenant services. The development also includes the dedication of the northern portion of the site for a City park.

The subject lands are approximately 0.79 hectares in size and have been cleared of the 3-storey former school building. The cleared site is proposed for to be split with 0.58-hectare dedicated to the mixed-use development and 0.21-hectare provided as parkland conveyance to the City of London.

The proposed building design uses “T”-shaped building four storeys in height with a step back provided to decrease the apparent massing to the rear. Two amenity areas are provided at grade in addition to the parking area. One of the areas is located on the northerly portion of the lands and is in association with the daycare centre. The other area is a plaza in the southerly portion of the lands and is intended for both the residents and the proposed community centre portion of the building.

The development will include 42 affordable rental dwelling units, consisting of one-, two-, three- and four-bedroom units, with approximately 1,300 square metres of non-residential ground floor space. The mixed-use development would equate to 97 units per hectare (subject to 3.4.1.a of the ZBL), whereby the residential density component of the calculated density equates to maximum 75 units per hectare.

## 3.0 Relevant Background

### 3.1 Planning History

This application is the first planning application specific to the subject lands. There is an active site plan approval application, made May 17, 2022 by the same applicant which informs the development of the bonus zone.

The Hamilton Road Community Improvement Plan (CIP) was established in 2016 to support redevelopment in the area. Most recently in July 2021 through O-9330 the CIP was updated to include metrics. The plan identifies new indoor community facility space and park spaces as an opportunity to be reviewed.

A Hamilton Road zoning study (OZ-8997) was completed in January 2020 following the establishment of the Hamilton Road CIP. This Zoning study established a Business District Commercial (BDC) Zone with a height limit of 13m along the length of Hamilton Road to facilitate redevelopment. The new zoning has also been applied to residential lots behind those facing Hamilton Road which do not have a Hamilton Road address or frontage. The BDC Zone now includes 19 and 21 Elm Street among others, recognizing that redevelopment may extend beyond the smaller lots facing Hamilton Road.

### 3.2 Requested Amendment

Three amendments have been requested through the application:

The London Plan

1. A site-specific amendment to policy 961 and to Map 7 of The London Plan to provide for the proposal is requested, whereby:  
*In the Neighbourhoods Place Type at 18 Elm Street, a mixed-use, low-rise, four-storey, 42-unit apartment building may be permitted on the southern portion (0.58 ha) of the Site. In addition to the primary residential use, ground floor community facility type uses, including a childcare centre, a community centre and/or other similar institutional uses may be permitted up to a cumulative maximum gross floor area of 1,4000 m<sup>2</sup>. A neighbourhood-scale Urban Park will be developed on the north portion (0.21 ha) of the Subject Lands.*

### The Z.-1 Zoning By-law

1. As the Z.-1 Zoning By-law applies to the proposal on the south portion of the Site, the existing Neighbourhood Facility (NF) Zone be amended to a Residential R8 Special Provision • Bonus (R8-4( )•B( )) Zone, wherein:
  - a) Special provisions to the requested Residential R8 (R8-4( )) Zone would include:  
Regulations
    - i. Additional Permitted Uses: Mixed-Use building containing a maximum of 42 Residential Units, a Child Care Centre, a Community Centre and/or other similar Institutional Uses;
    - ii. Maximum Cumulative Gross Floor Area for all Child Care Centre, Community Centre and/or other similar Institutional Uses: 1,400 m<sup>2</sup>;
    - iii. Front Yard Setback: 4.0 metres;
    - iv. North Interior Side Yard Setback: 4.0 metres;
    - v. Height: 14.3 metres
    - vi. Parking Standard for all uses in a Mixed-Use Apartment Building: 46 parking spaces.
2. A Bonus B( ) Zone that would provide for a built density of 100 units per hectare (with a maximum of 42 dwelling units) in return for a specialized affordable rental housing model providing for wraparound tenant and community services and supports.
3. As the Z.-1 Zoning By-law applies to the parkland conveyance on the north portion of the site, the existing Neighbourhood Facility (NF) Zone be amended to an Open Space 1 Special Provision (OS1( )) Zone, wherein:
  - a) Special provisions to the Open Space 1(OS1( )) would include:  
Regulations
    - i. Minimum Lot Area: 2000 m<sup>2</sup>.

### The City of London Official Plan (1989)

1. Amend Schedule A, Land Use, to change the designation of the Subject Lands from a Low Density Residential Designation to a Multi-Family Medium Density Residential Designation.
2. A site-specific amendment to Section 10.1.3 of the City of London Official Plan to provide for the proposal is requested, whereby:  
*In the Multi-Family Medium Density Residential designation at 18 Elm Street, a mixed-use, low-rise, four-storey, 42-unit apartment building may be permitted on the southern portion (0.58 ha) of the Site. In addition to the primary residential use, ground floor community facility type uses, including a childcare centre, a community centre and/or other similar institutional uses may be permitted up to a cumulative maximum gross floor area of 1,4000 m<sup>2</sup>. A neighbourhood-scale Urban Park will be developed on the north portion (0.21 ha) of the Subject Lands.*

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

Three public comments were received prior to the completion of the report. Concerns noted by the respondents include privacy, noise, crime, tree preservation, building location and massing, and public access to proposed day care use. One commenter provided unequivocal support for the development of affordable housing and listed no concerns with the development. The concerns noted are addressed further in the analysis provided in section 4 below.

### 3.4 Policy Context

#### *Provincial Policy Statement, 2020*

The Provincial Policy Statement, 2020 provides over-arching guidance on planning work within the province of Ontario. Policy 1.1.1 of the PPS supports the development of healthy, livable and safe communities by requiring a mix of residential types and institutional uses. Policies 1.1.3.3 and 1.1.3.6 of the PPS require municipalities to identify appropriate locations for infill such as that proposed and to ensure proposed densities make efficient use of infrastructure, respectively.

### *The London Plan*

The subject lands are designated as Neighbourhoods Place Type within The London Plan and are adjacent to the Urban Corridor designation applicable to Hamilton Road. As a site fronting onto a neighbourhood street the base permissions within The London Plan are for single-detached and some multi-family forms, excluding the low-rise apartment form requested, to a maximum of 2.5 storeys. The community uses requested through the application are permitted within the Place Type although they would be directed to other street classifications.

### *Housing Stability Action Plan*

The City of London has prepared a Housing Stability Action Plan, sub-titled, the Roadmap to 3,000 Affordable Units Action Plan which is of note given the applicant's intent to develop the site for affordable housing. The applicant – Housing Development Corporation, London has been delegated responsibility to deliver affordable housing by council as its service manager for affordable housing.

## **4.0 Key Issues and Considerations**

### **4.1 Compatibility of Use, Intensity and Form**

The primary questions around this application relate to use, intensity and form and the relative compatibility of the proposed mixed-apartment building on the available vacant former school site within a low-rise neighbourhood and adjacent to a primary corridor with a mix of commercial, institutional and residential uses. Both official plans provide analytic frameworks to determine compatibility.

The proposal must demonstrate compatibility when reviewed under the applicable policies of The London Plan for Neighbourhoods and more specifically as an example of infill development.

As an infill development the proposal is required to meet the requirements of policy 953 within the Neighbourhoods Place Type. Through the location of the buildings access points, both pedestrian and vehicular, the development directs access traffic to the southern portion of the property furthest away from the low-rise residential uses surrounding it. The building's massing is concentrated along the front of the street to minimize shadow impacts on abutting neighbours. The building provides a cut out to the rear to transition height to the east and is limited to one storey above the steeple of the church adjacent to the south. The previous school building has demonstrated that similar mass and scale is in keeping with the neighbourhood.

Although the proposed development can demonstrate compatibility within the neighbourhood following an evaluation guided by the policies of The London Plan it does not meet the specific regulatory policies applicable to the site. The site itself is located a Neighbourhood Street though it abuts a property on a Civic Boulevard. As the height and use permissions within the Neighbourhoods place type are tied to the street classification, the applicant would be entitled to greater permissions simply by merging with the site to the south. Were the site merged prior to the drafting of The London Plan it would likely been given the same permissions as the property to the south with is within the Urban Corridor place type and provides greater permissions still.

The specific permissions applicable to sites within the Neighbourhoods place type are provided through Table 10 of The London Plan and would limit the development under the existing permissions to a duplex use. The policies would require Elm Street to be a neighbourhood connector to avail of the low rise apartment and community facility-permissions sought. Policy 930 indicates that the community facilities sought within the Neighbourhood Place Type specifically include day cares and community centres although again would direct them to a neighbourhood connector. Table 11 limits the subject lands to 2.5 storeys (less than the 3 previously on site) but would permit up to 6 storeys on the adjacent lands to the south. The applicant has requested a site specific policy for the lands which would provide for the development and is discussed further in 4.3 below.

The proposed application has also been reviewed under the policy framework of the 1989 Official Plan given the 1989 OP was in effect at the time of the application submission. Section 3.1.1. of the 1989 Official Plan identifies a number of general objectives for all residential land use designations, which include:

- Residential designations shall support the provision of a choice of dwelling types according to location, size, affordability, tenure, design and accessibility so that a broad range of housing requirements are satisfied;
- Residential designations shall encourage infill residential development in residential areas where existing land uses are not adversely affected and where development can utilize municipal services and facilities;
- Residential designations shall support the provision of services and amenities that enhance the quality of the residential environment; and,
- Residential designations shall promote residential development that makes efficient use of land and services.

The proposal supports each of these objectives individually, by adding to the housing options within the neighbourhood and providing amenities both needed by the neighbourhood and lost through the school closure. The proposal is an example of infill and uses existing services efficiently. Importantly the mixed-use portion by providing space for community uses returns to the community some of the space lost through the removal of the school.

Chapter 3 Residential Land Use Designations also includes section 3.7 which is provided to guide the evaluation of planning impacts when reviewing changes in land use regulation.

The proposal is for a primarily residential use within a residential area. The height is one storey greater than the previous building on the site and has been designed to reduce the impact of the building's mass through locating the majority of the mass to the front of the site, using a single hallway to the rear and recessing a portion of the fourth floor where the building approaches its neighbours. The community uses proposed will be similar but likely of lesser impact than the school previously located on the site. The parcel is one of few rectangular larger lots which can provide for the needed uses within the neighbourhood. It is located one parcel from the Hamilton Road corridor and near Trafalgar both of which provide public transit options. Vehicular access to the site is limited to a single entrance located at the furthest point on the site from adjacent residential uses.

The proposal can demonstrate compatibility with the neighbourhood as evaluated under the policies of the Official Plan, 1989. An appropriateness of the requested amendments to provide for the development is discussed in 4.2 below.

#### **4.2 Official Plan, 1989**

The application received requested an amendment to the Official Plan, 1989 to: re-designate the subject lands for Multi-Family Medium Density Residential to permit a greater density and establish a Special Policy Area to allow for the community uses. Although as of May 25, 2022 the Official Plan, 1989 has been repealed, as the application was made prior to that date consideration for the plan must be made as it was in force in effect at the time of the application. Given that it has since been repealed however no amendments will be made to the Official Plan, 1989.

The application did request a change in designation for the subject lands from Low Density Residential designation to a Multi-Family Medium Density Residential designation on the site. As demonstrated above the proposal is able to demonstrate compatibility in accordance with the analytic framework provided by the Official Plan, 1989. The objectives for the Multi-Family Medium Density Residential designation specifically indicate the purpose of the designation is to:

Support the development of multi-family, medium density residential uses at locations which enhance the character and amenity of a residential area, and where there is safe and convenient access to public transit, shopping, public open space, recreation facilities and other urban amenities.

As the proposal includes desired community amenities, has convenient access to public transit and is at a location where it is able to enhance the residential area in which it is located. The proposal demonstrates compatibility with the policies of the Official Plan, 1989 and a re-designation to Multi-Family Medium Density Residential Would be appropriate. Furthermore, the proposal would be able to implement the requested Multi-Family Medium Density Designation were the Official Plan, 1989 still in force and effect.

The application also provided justification for the subsequent bonus zone request under the policies of the Official Plan, 1989, in effect at the time of application. The application is able to demonstrate compliance with the policies of 19.4.4 – Bonus Zoning, by serving the identified objectivea for bonus zones, specifically: affordable housing, enhanced provision of landscaped open space, day care facilities and accessible design. Furthermore the required site plan approval process (underway) will provide the agreements necessary to ensure any bonusable elements are acquired through the development.

#### **4.3 The London Plan Specific Policy Area**

The proposed development though compatible with the surrounding neighbourhood is not directly supported by The London Plan Place Type polices directly applicable to the site. Recall the site is on a neighbourhood street, a location providing the most stringent base permissions for height and uses (limiting the site to a duplex and 2.5 storeys for the site under the existing policy) despite its adjacency to an Urban Corridor Place Type.

The applicant has requested an amendment which would create a specific policy area to allow for the use. The requested language for the specific policy area is:

In the Neighbourhoods Place Type at 18 Elm Street, a mixed-use, low-rise, four-storey, 42-unit apartment building may be permitted on the southern portion (0.58 ha) of the Site. In addition to the primary residential use, ground floor community facility type uses, including a childcare centre, a community centre and/or other similar institutional uses may be permitted up to a cumulative maximum gross floor area of 1,4000 m<sup>2</sup>. A neighbourhood-scale Urban Park will be developed on the north portion (0.21 ha) of the Subject Lands.

A specific policy area is the mechanism to provide for the mixed-use apartment building on the subject lands given that compatibility has been demonstrated. The language of the requested amendment however is overly prescriptive and provides a level of detailed regulation more appropriate to a zoning by-law. The policy also does not tie the increased height requested to the provision of bonusable items as laid out below. As the following alternate language is recommended as a specific policy area to apply to the subject lands at 18 Elm Street:

In the Neighbourhoods Place Type at 18 Elm Street, a mixed-use apartment building with community uses at grade may be permitted. Subject to the provisions of an established bonus zone, the mixed-use apartment building permitted may be up to 4-storeys in height.

In establishing a specific policy area policies 1729 – 1734 of the Our Tools section must be considered. These policies are provided to determine whether a specific policy area is appropriate for a given site. With regards to the requested amendment, the establishment of a specific policy for the area maintains the integrity of the place type providing a transition of uses from the urban corridor it abuts to the south. The uses proposed are a unique configuration resulting from the unique (to the neighbourhood) situation of a school closure, which creates an unusually large redevelopment block for



infill. The uses are all permitted within the place type, but not at the location under the standard policy framework and as such require a specific policy area to ensure these desired uses are located within the place type at this location.

#### **4.4 Implementing Zone**

The applicant has requested a Residential R8 Special Provision Bonus (R8-4( )•B( )) Zone. Leaving aside the provisions of the bonus zone (as addressed below) the requested implementing zone is Residential R8 a zone, a zone to provide for low-rise apartment buildings of a medium density which reflects the proposed development. The proposal specifically requests the R8-4 zone variation which relies on 30m of frontage (proposal is 79.9) and a lot area of 1000 sq.m (proposal is 5775) both of which the proposed site can easily accommodate.

Special provisions requested support the proposed non-residential uses to be included in the development, the proposed scale of the mixed-use building and the parking associated with the development.

The first special provisions are for the Community Centre and Day Care Centre uses which are a the non-residential portion of the proposed mixed-use concept. As established previously these uses have demonstrated compatibility with the site and as such the requested additional provisions are recommended. Recognizing that the primary purpose of the proposed development is residential the applicant has requested a 1400 sq.m. limit on the community uses proposed within the development. The requested limit is appropriate and a special provision that would limit the Day Care Centre and Community Centre uses to a combined 1400 sq.m. is recommended.

The second group of special provisions relate to the size of the proposed building and seek a maximum setback of 4.0m for the northern interior side yard and front yard and a height maximum of 14.3m. The northern interior side yard would face the future park and as such is has no effective impact on residential neighbours when compared to the 4.8m interior side yard that is otherwise required. The front yard setback requirement without special provision is 8.0m and a reduction to 4.0m has been requested by the applicant. The reduction allows the massing of the building to come to the street reducing shadow impacts on residential neighbours to the east. It also allows for a larger interior courtyard which is intended to function both as a community centre associated outdoor space and as amenity for residents of the building. The final requested special provision is for an increase in maximum height to 14.3m from the 13.0m otherwise required in the zone. This would have the effect of allowing a four-storey building in place of the 3-storey building previously on site and permitted under the proposed implementing zone. The applicant has provided bonusable elements to justify the additional height and as such the increased height should be considered as part of a bonus zone. It is recommended that the two decreased yard setbacks be approved as special provisions under the R8-4 zone variation. It is recommended that the requested height special provision not be included under the requested R8-4 zone variation and that consideration for the increase height be considered as part of the requested bonus zone.

The applicant has requested a blanket parking standard for all uses within the proposed mixed-use apartment building of 46 parking spaces. The applicant has provided an assessment from F.R. Berry & Associates on the parking rate proposed. In the assessment they note that once the parking requirements for non-residential services were removed the effective parking ratio for apartment units is 0.81 parking spaces per unit. They note further that in addition to being well served by transit, the development's proposed purpose as affordable housing makes it anticipable that parking take-up would be less than that currently required for apartments under the Zoning By-law. This explanation is considered sufficient and a parking requirement of 46 spaces for the proposed development is recommended.

The requested R8-4 special provision zone variation is recommended with all but one of the requested special provisions, that for increased height. However, the requested

height increase is recommended for consideration under the bonus zone, which is also requested by the applicant.

#### **4.5 Bonus Zone**

The establishment of a bonus zone relies on the provision of facilities, services or matters of public benefit in exchange for additional height and density permissions related to an associated development. In this particular instance the density proposed of 97uph is greater than that otherwise would be permitted within the requested zone. The height requested is 14.3m to allow for four storeys when the base zoning requested would limit the building to 13.0m and the policy would limit the height to 2.5 storeys otherwise at this location.

To accommodate the additional height and density the proposed development offers two primary public benefits: 1 – provision of affordable housing and 2 - a Day Care Centre and Community Centre as community uses. Both of these are facilities identified through previous study as needed elements within the community through the Hamilton Road Area CIP review which considered both the threat of school closings and the opportunities associated with new community spaces in the list of Identified Community Improvement Needs.

The Hamilton Road Area CIP identified the need for more interior community/social spaces as an area for improvement within the corridor, considering the search for opportunities to acquire this space ongoing work. The community facility and day care centre replace the public space recently lost with the demolition of the prior school building which now lost to the community. The proposal provides a significant amount of community facility and day care space dedicating the vast majority of the ground floor to the two community uses.

Affordable housing is a necessity across the City as noted in The London Plan and City of London's Housing Stability Action Plan 2019-2024 which identifies the creation of new housing stock as a priority. The current proposal provide 42-units of affordable housing at a variety of bedroom counts to support different family arrangements. Although previous amendments should not dictate the decisions of subsequent applications it is worthy of note that the proposal is not for market rate housing seeking to bonus based on a portion of affordable housing, but the development proposed is to be developed entirely as affordable housing.

Having established the public benefits provided the question of the relationship of the provided facilities to the requested additional height and density remains. It is of note that with the community facility uses removed the building would be 3-storeys in height and 75 uph in density and fit within the base Residential R8 Zone. Subject to the policies of the Official Plan, 1989 an increase through bonusing in Multi Family Medium Density areas is limited to 100 uph which the proposal meets and is implemented through the proposed bonus zone regulations. In this case the additional permissions provided through the bonus zone are directly required to allow for the public benefits to be provided. As such a bonus zone for the additional height and density in exchange for the community facilities is recommended.

#### **4.6 Site Plan Matters**

As a bonus zone incorporates schedules which direct the future site plan approval by including a complete set of site plan and elevations it is important to review site plan matters through the Official Plan and Zoning By-law Amendment to ensure the applied zone is implementable at the site plan approval stage.

On May 17, 2022 a complete Site Plan Approval Application was submitted by the applicant. This application reflects the materials provided to support the Official Plan and Zoning By-law amendments with additional detail needed for site plan approval review.

Prior to site plan application the proposal was reviewed by the Urban Design Peer Review Panel and a memo addressing the panel's comments was included as part of

the complete application received (see appendix E for full comments and applicant response). The elevations received with the site plan application were of a high standard, addressed previous comments provided through consultation and by the urban design peer review panel. The elevations received were acceptable and as such can form schedules in support of the bonus zone without concern regarding their implementation.

Engineering comments provided at first submission were of a technical nature and did not require a change to the design approach taken for the site. First submission landscape comments were primarily related to the tree preservation plan provide, noting that permission is required for any shared trees proposed for removal or at risk of damage. It was also noted that many of the shared trees are of non-native or invasive species and not particularly healthy.

The site plan review included comments regarding vehicular circulation on the south of the site however it was noted that the applicant was maximizing the potential amenity area both for residents and the community centre use. A number of minor comments including a need for details on bicycle parking and clarification on waste management means the plans were not able to be accepted at first submission but could be addressed through refinements to the existing design.

Through the community feedback received a number of primarily site plan related matters were raised including building massing, privacy, noise, building location and preservation of the trees along the eastern property boundary.

As noted above the location and massing of the building is designed to reduce the scale of the structure adjacent to the residential neighbours. The building shape also situates the majority of the units toward the front of the property providing separation to reduce noise and potential overlook from future residents of the development.

The applicant's proposal maintains the existing trees and fence as requested by the neighbours with removals limited to those trees which are invasive or unhealthy. Keeping this screen should maintain the existing level of privacy and noise experienced by the neighbours. Additional screening measures including walls (not permitted by the fence by-law) and large conifer plantings would hamper the success of the existing hedgerow.

Additional site plan elements under consideration include lighting, garbage and recycling pick-up. Lighting was reviewed at first submission and no light trespass is shown on the provided plans. The applicant did receive one comment regarding up-lighting from fixtures used near the front of the site. Garbage and recycling is provided for through an internal garbage room with a designate put out location. The specific put-out location is under review from waste management to ensure trucks can service the proposed location.

More information and detail are available in the appendices of this report.

## **5.0 Conclusion**

The development proposal under review is brought by the City's service manager for affordable housing to provide 42-units of affordable housing and small-scale community facilities on a former school site. Policies are generally supportive of these uses which are of identified need both broadly through city-wide policies of The London Plan and specifically and local by reviews completed on the Hamilton Road neighbourhood. The proposal is able to demonstrate its compatibility with the neighbourhood when reviewed against the applicable official plan policies. The requested amendments are, with minor revisions, recommended to facilitate the development of the proposal.

**Prepared by:**                    **Leif Maitland**  
**Site Development Planner, Planning and Development**

**Submitted by:**                **Michael Pease, MCIP RPP**  
**Manager, Site Plans**

**Recommended by:**        **Gregg Barrett, AICP**  
**Director, Planning and Development**

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

July 18, 2022

cc: Heather McNeely, Manager, Current Development

    Ismail Abushehada, Manager, Development Engineering

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## Appendix A

Bill No. (number to be inserted by Clerk's Office)  
2022

By-law No. C.P.-2016-\_\_\_\_\_

A by-law to amend The London Plan for  
the City of London, 2016 relating to 18  
Elm Street.

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

1. Amendment No. (to be inserted by Clerk's Office) to The London Plan for  
the City of London Planning Area – 2016, as contained in the text attached hereto and  
forming part of this by-law, is adopted.
2. This Amendment shall come into effect in accordance with subsection  
17(27) of the *Planning Act, R.S.O. 1990, c.P.13*.

PASSED in Open Council on August 2, 2022

Ed Holder  
Mayor

Michael Schulthess  
City Clerk

First Reading – August 2, 2022  
Second Reading – August 2, 2022  
Third Reading – August 2, 2022

**AMENDMENT NO.  
to the  
THE LONDON PLAN FOR THE CITY OF LONDON**

A. PURPOSE OF THIS AMENDMENT

The purpose of this Amendment is:

1. To establish a specific policy area for the subject lands at 18 Elm Street on Schedule "A", Map 7 – Specific Policy Areas, to The London Plan for the City of London.
2. To add a policy in The Neighbourhoods Place Type of The London Plan for the City of London to allow for the use as proposed and requested.

B. LOCATION OF THIS AMENDMENT

3. This Amendment applies to lands located at 18 Elm Street in the City of London.

C. BASIS OF THE AMENDMENT

The proposed development demonstrates compatibility with its surrounding context and allows for uses that would otherwise be permitted within the Place Type.

D. THE AMENDMENT

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

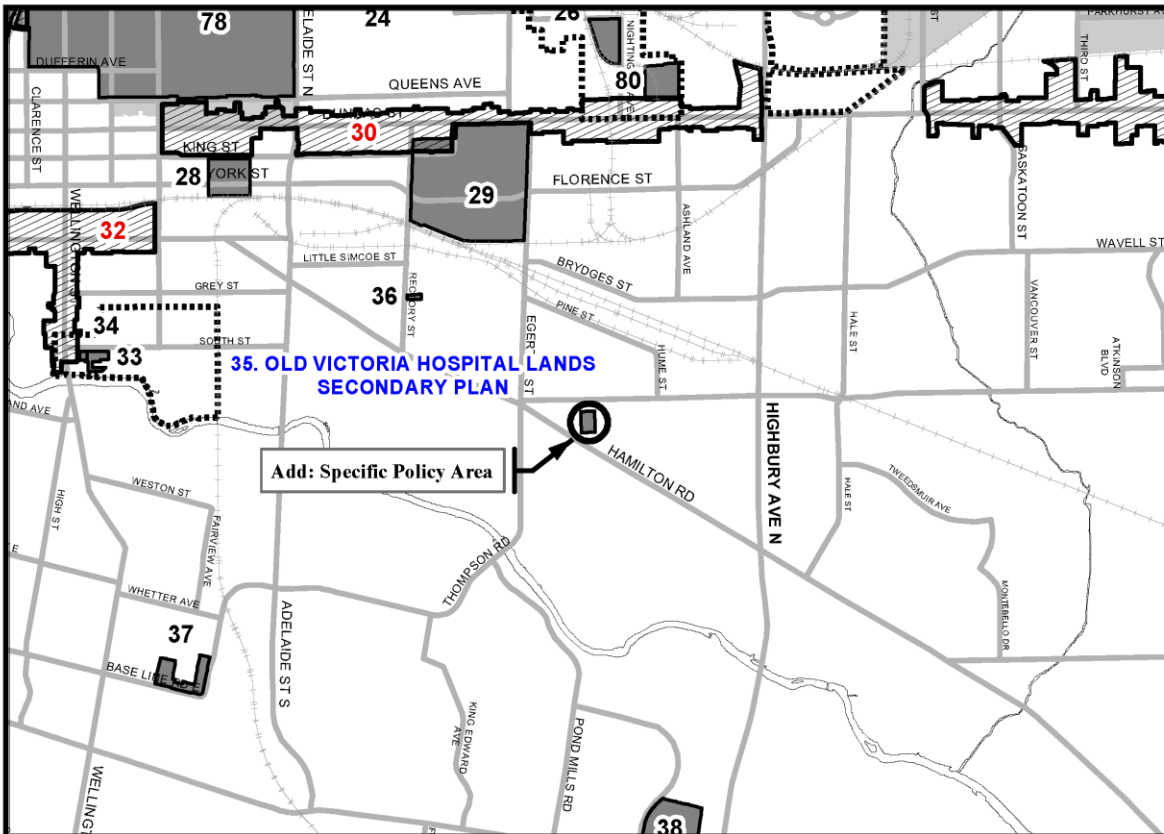
*The London Plan* is hereby amended as follows:

1. Map 7 – Specific Policy Areas, of The London Plan for the City of London Planning Area is amended by adding a specific policy area for those lands located at 18 Elm Street in the City of London, as indicated on "Schedule 1" attached hereto from.
2. The Neighbourhoods Place Type of The London Plan for the City of London is amended by adding the following as a new policy in the appropriate alphabetical location, following policy 1059:

18 Elm Street

1058A\_ In the Neighbourhoods Place Type at 18 Elm Street, a mixed-use apartment building with community uses at grade may be permitted. Subject to the provisions of an established bonus zone, the mixed-use apartment building permitted may be up to 4-storeys in height.

AMENDMENT NO:



**LEGEND**

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

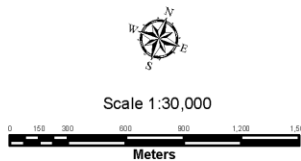
**BASE MAP FEATURES**

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

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

**SCHEDULE 1  
TO  
THE LONDON PLAN**  
AMENDMENT NO. \_\_\_\_\_

PREPARED BY: Planning Services



**FILE NUMBER:** OZ-9496

**PLANNER:** LM

**TECHNICIAN:** RC

**DATE:** 6/17/2022

## Appendix B

Bill No. (number to be inserted by Clerk's Office)  
2022

By-law No. Z.-1-22\_\_\_\_\_

A by-law to amend By-law No. Z.-1 to rezone an area of land located at 18 Elm Street.

WHEREAS Housing Development Corporation, London have applied to rezone an area of land located at 18 Elm Street, as shown on the map attached to this by-law, as set out below;

AND WHEREAS upon approval of Official Plan Amendment Number (number to be inserted by Clerk's Office) this rezoning will conform 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 18 Elm Street, as shown on the attached map from a Neighbourhood Facility (NF) Zone **TO** a Residential R8 Special Provision Bonus (R8-4( )•B( )) Zone; and an Open Space 1 Special Provision (OS1( )) Zone.
- 2) Section Number 4.3 of the General Provision is amended by adding the following Bonus Zone:

B - \_                      18 Elm Street

The Bonus Zone shall be enabled through one or more agreements to facilitate the development of a 4-storey mixed-use apartment building with 42 units and a minimum of 800 sq.m. of community uses which substantively implements the Site Plan and Elevations attached as Schedule "1" and Schedule "2" to the amending by-law.

The bonus provided is for additional height and density is based on the provision of community uses.

The following special regulations apply within the bonus zone:

- |      |  |           |
|------|--|-----------|
| a)   | Additional Special Regulations                   |           |
| i)   | Height (max)                                     | 14.5 m    |
| ii)  | Density (max)                                    | 100 uph   |
| iii) | Day Care and Community Centre combined GFA (min) | 800 sq.m. |

- 3) Section Number 12.4 of the Residential R8 Zone is amended by adding the following Special Provisions:

R8-4( )                      18 Elm Street

- |      |   |            |
|------|---|------------|
| b)   | Additional Permitted Uses                   |            |
| i)   | Day Care Centre                             |            |
| ii)  | Community Centre                            |            |
| c)   | Regulations                                 |            |
| i)   | Gross Floor Area non-residential uses (max) | 1400 sq.m. |
| ii)  | Front Yard Setback (min)                    | 4 m        |
| iii) | North Interior Sideyard Setback (min)       | 4 m        |



- iv) Parking spaces for all uses in a mixed-use apartment building  
46 spaces

4) Section Number 36.4 of the Open Space is amended by adding the following Special Provisions:

- OS1( ) 18 Elm Street
  - a) Regulations
    - i) Minimum Lot Area (min) 2000 sq.m.

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 August 2, 2022.

Ed Holder  
Mayor


Michael Schulthess  
City Clerk

First Reading – August 2, 2022  
Second Reading – August 2, 2022  
Third Reading – August 2, 2022

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



**File Number:** OZ-9496  
**Planner:** LM  
**Date Prepared:** 2022/06/16  
**Technician:** RC  
**By-Law No:** Z.-1-

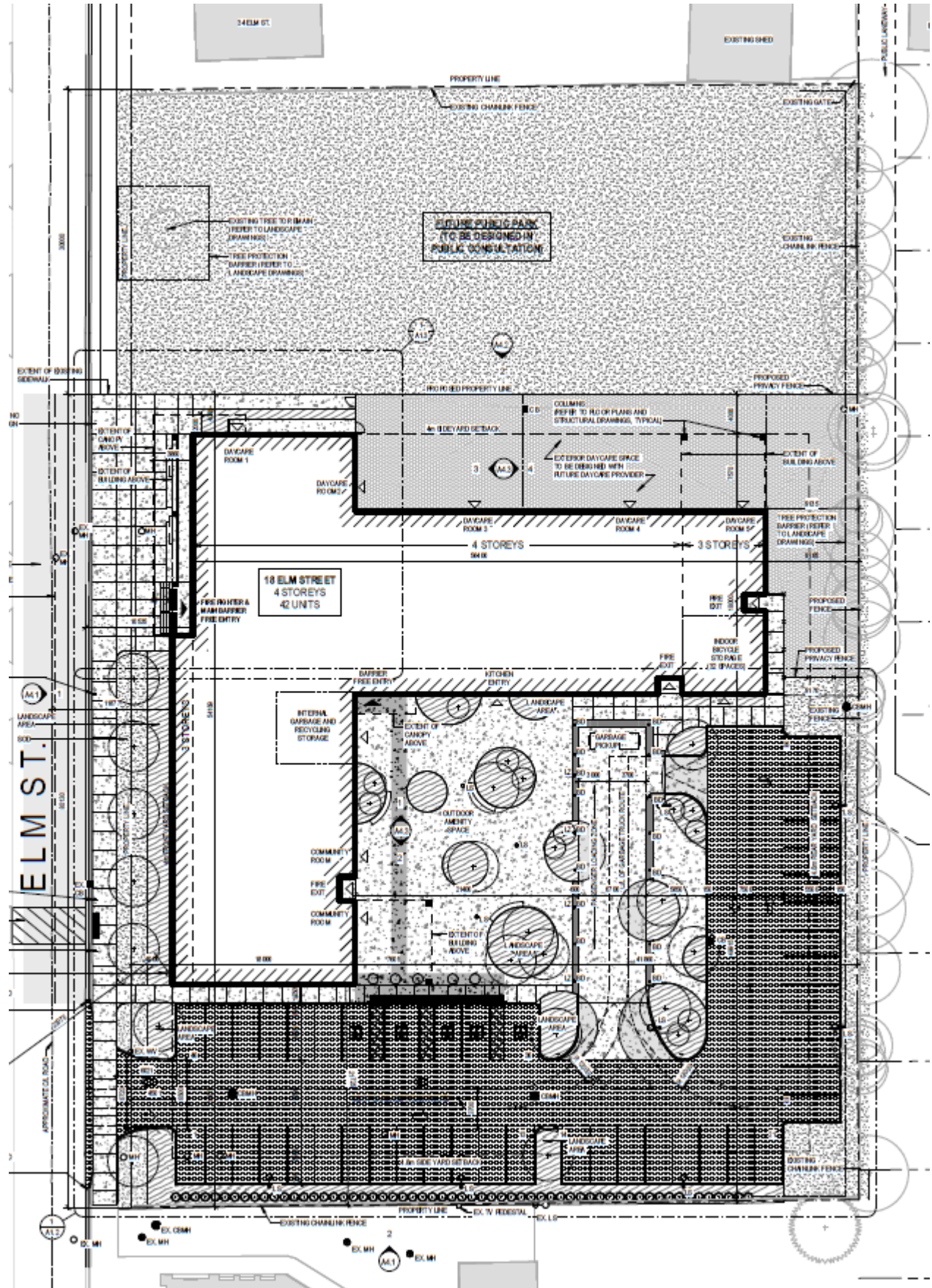
**SUBJECT SITE** 

**1:1,250**

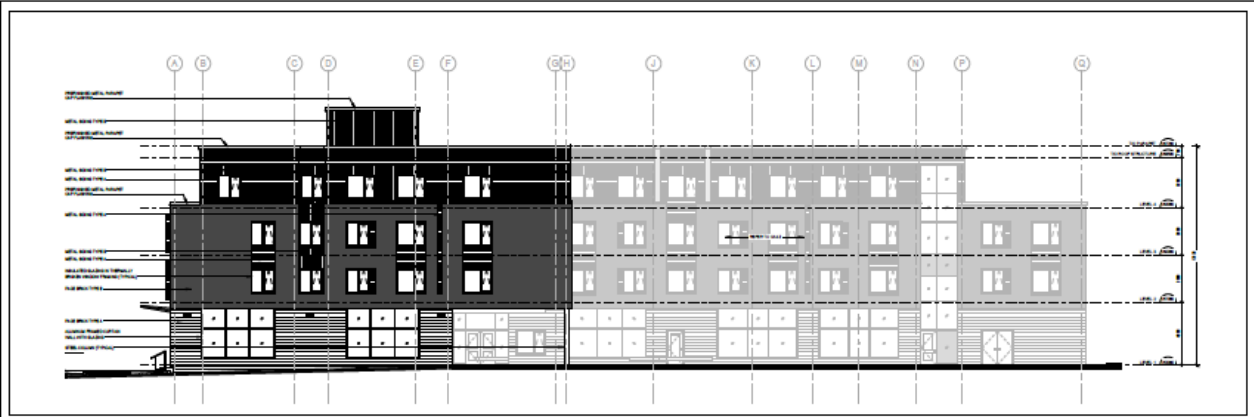
0 5 10 20 30 40 Meters



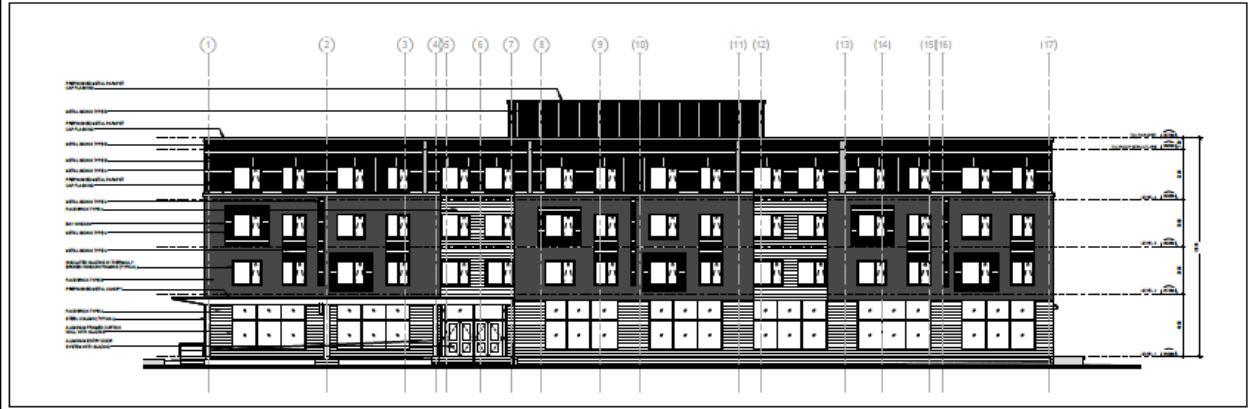
Bonus Zone Schedule 1 – Site Plan



# Bonus Zone Schedule 2 – Elevations



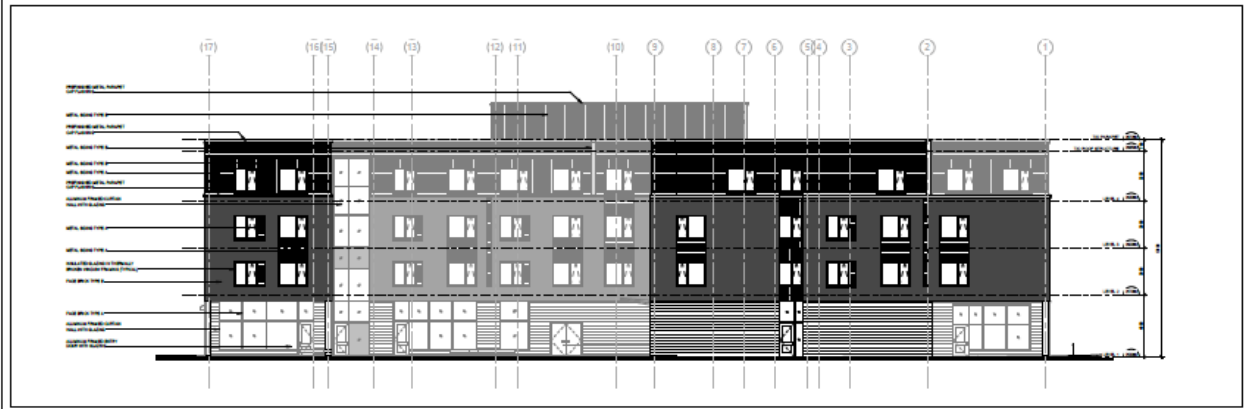
South Elevation  
1/8" = 1'-0"



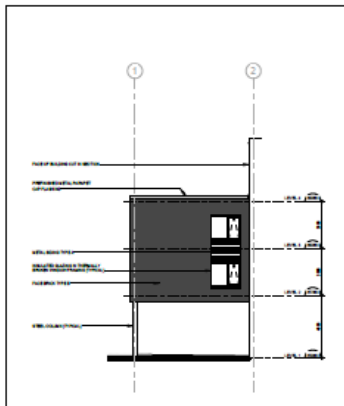
West Elevation  
1/8" = 1'-0"



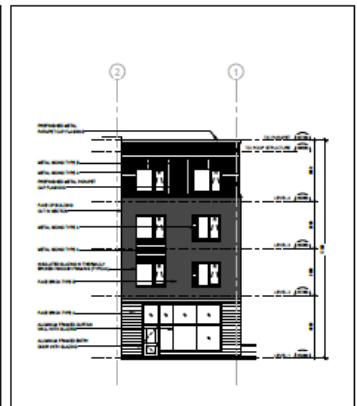
North Elevation  
1/8" = 1'-0"



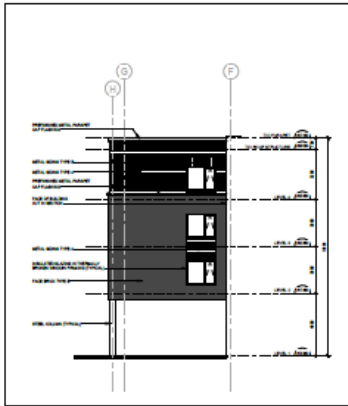
East Elevation  
1/8" = 1'-0"



Partial West Elevation  
1/100



Partial East Elevation  
1/100



Partial North Elevation  
1/100



Partial South Elevation  
1/100



## Appendix C – Public Engagement

### Community Engagement

**Public liaison:** On April 21, 2022 Notice of Application was sent to 167 property owners in the surrounding area. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on April 21, 2022 A “Planning Application” sign was also posted on the site.

3 replies were received

**Nature of Liaison:** 18 Elm Street – The purpose and effect of this Official Plan and zoning change is to permit a 4-storey mixed use apartment building with 42 units, 1300 sq. m of non-residential community uses on the ground floor including a day care. A bonus zone with permission for 100 units per hectare of density in exchange for a specialized affordable housing approach including supports through a bonus zone is proposed as is the establishment of the northern portion of the site as a public park through an Open Space zone. Possible amendment to the Official Plan from Low Density Residential to Medium Density Multi-Family Residential. Possible amendments to The London Plan and The Official Plan to provide site specific provision to allow for the development.. Possible change to Zoning By-law Z.-1 FROM an Neighbourhood Facility (NF1) TO a Residential R8 special provision • Bonus (R8-4( )•B( )) Zone and an Open Space special provision (OS1( )) Zone File:OZ-9496 Planner: L. Maitland.

#### Concerns Identified in Public Responses:

Privacy, noise, crime, tree preservation, building location and massing, and public access to proposed day care use.

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

To: Zelinka Priamo Ltd  
Attention: Shradha Arun

In regards to the Virtual Meeting on 01 June 2022, and the proposed apartment building on Elm St; My wife & I will be unable to attend due to work.

My Neighbour is not on the internet and will also not be able to attend. However I have talked to neighbours who live behind the building, on Hyla Street, and our concerns and solutions are very similar. I would like to submit them to you, before your plans are presented to the city council.

I received your diagram of the plans for the apartment building, but it shows very little information about what action would be taken to help the community who live behind the property.

Our concerns are mostly around 4 issues; privacy, noise, crime, and conservation. A row of tall spruce trees by our property lines would help provide year round privacy from a huge apartment building in our backyards. Tall spruce trees would also help with noise pollution.

A new 50 car parking lot behind your house would be upsetting to most homeowners, but this idea of spruce trees would be helpful. Cutting the bottom limbs off the trees would also provide a more secure, safer and open parking lot.

We believe a tall privacy wall would help with the noise of revving engines, diesel engines, loud mufflers, motorcycles and car doors slamming shut through the day and night. A tall privacy wall would also help owners feel safer from crime and trespassing in an already a low income and high crime neighbourhood.

We would like to see very good security cameras installed and a brightly lit parking lot to discourage criminal activity.

Lastly, conservation of the trees behind our properties is very important to me and my neighbours. There is a chain link fence between the border of our properties and the property on Elm Street. Removing this fence may damage or destroy the growing trees we have. Please confirm these trees will not be damaged and the fence will not be removed if there is possible damage to our trees.

Since many people in the community will be unable to attend the Virtual meeting on 01Jun2022, we would expect a letter confirming the minutes of the meeting and the important information that was discussed.

Thank you for your attention to this matter.

Mark Baertsoen 39 Hyla St London ON

---

Hello

My apologies, I misread and thought that we had till May 29th to express concerns regarding the development at 18 Elm St. London. I hope it's okay to send this email still.

I have a few questions

1. The height of the building. We had been led to believe that the building would not be any taller than the height of the former school, and it looks like this building would be at least one floor higher
2. The current design seems to be right up on the sidewalk and that has me concerned. Elm St is a street with crossing lights at both Hamilton and Trafalgar making it an ideal sidewalk for those wanting access to bus service and having a building opening up so close to the sidewalk seems a bit tight to me.
3. I see it will be zoned for day care. Is that for residents of the complex only, or will it be open to the public. If it is open to the public, having the sidewalk a space between the road and the sidewalk would be a excellent idea for those who might be driving to bring the children to the daycare and not have them blocking the already narrow street.

Thank you

Maria Marques Di Cicco. 236 Ellerslie Rd, London ON

---

Good afternoon Leif and Councillor Van Holst. I am writing you today as a private citizen of London, I own a home in Fairmont at 34 Algonquin Crescent.

I could not be more strongly in favour of this proposal. Please keep me apprised of this process as it unfolds and add me to whichever mailing list I need to be on to make sure that I'm notified of the eventual meeting date as I would like to appear as a delegation in support of the application.

Have a great weekend

Alex

Alex Vandersluis 34 Algonquin Crescent, London ON

### **Agency/Departmental Comments**

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

Servicing the above proposal should present no foreseeable problems. Any new and/or relocation of existing infrastructure will be at the applicant's expense, maintaining safe clearances from L.H. infrastructure is mandatory. Note: Transformation lead times are minimum 16 weeks. Contact the Engineering Dept. to confirm requirements & availability.

*Parks Planning:* Parks Planning and Design staff have reviewed the submitted notice of application and offer the following comments:

- Parkland dedication will be satisfied through the dedication of the 0.21 ha park and will be finalized through the site plan approval process.
- The 0.21ha park will be constructed as a Neighbourhood Park (not an Urban Park) as described in the City of London Design Specifications Requirements Manual timing of park construction is to be determined and may require further public consultation and detailed design.

*Water Engineering:* Water is available to the site via a 150mm water service stub off of the municipal 150mm PVC0 watermain on Elm Street.

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

## **Appendix D – 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, 2020 – Policies 1.1.1, 1.1.3.3, 1.1.3.6

The London Plan – Policies 937-940, 953, 1729-1734, Table 10, Table 11

The City of London Official Plan, 1989 – Policies 3.1.4, 3.3, 3.7, 19.4.4

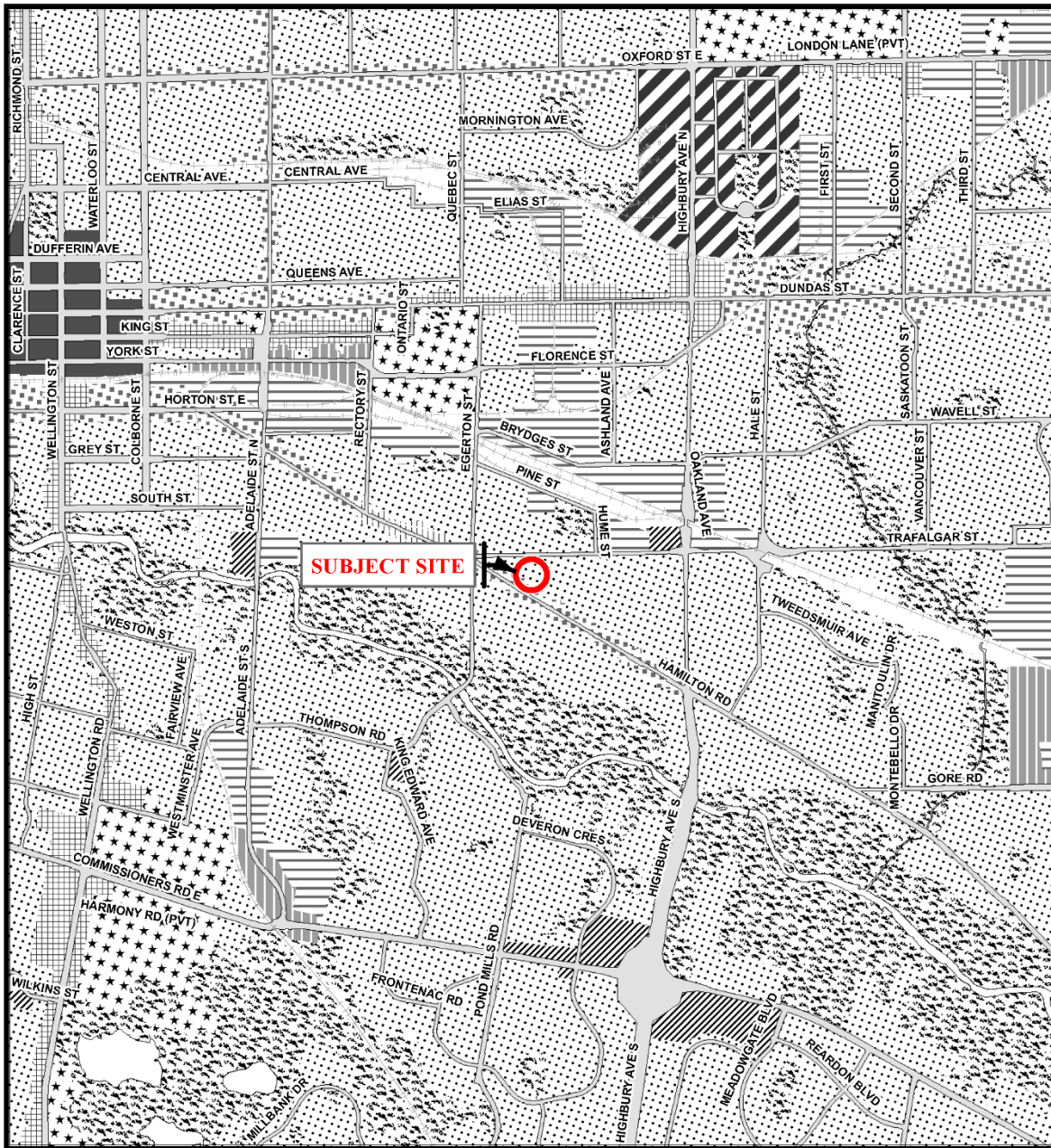
Hamilton Road Area Community Improvement Plan – Categories of Identified Community Improvement Needs, Action items 1.4, 4.2, 6.9.

The Housing Stability Action Plan



# Appendix E – Relevant Background

## Additional Maps



### Legend

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

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

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

### CITY OF LONDON

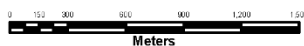
Planning Services /  
Development Services

### LONDON PLAN MAP 1 - PLACE TYPES -

PREPARED BY: Planning Services



Scale 1:30,000



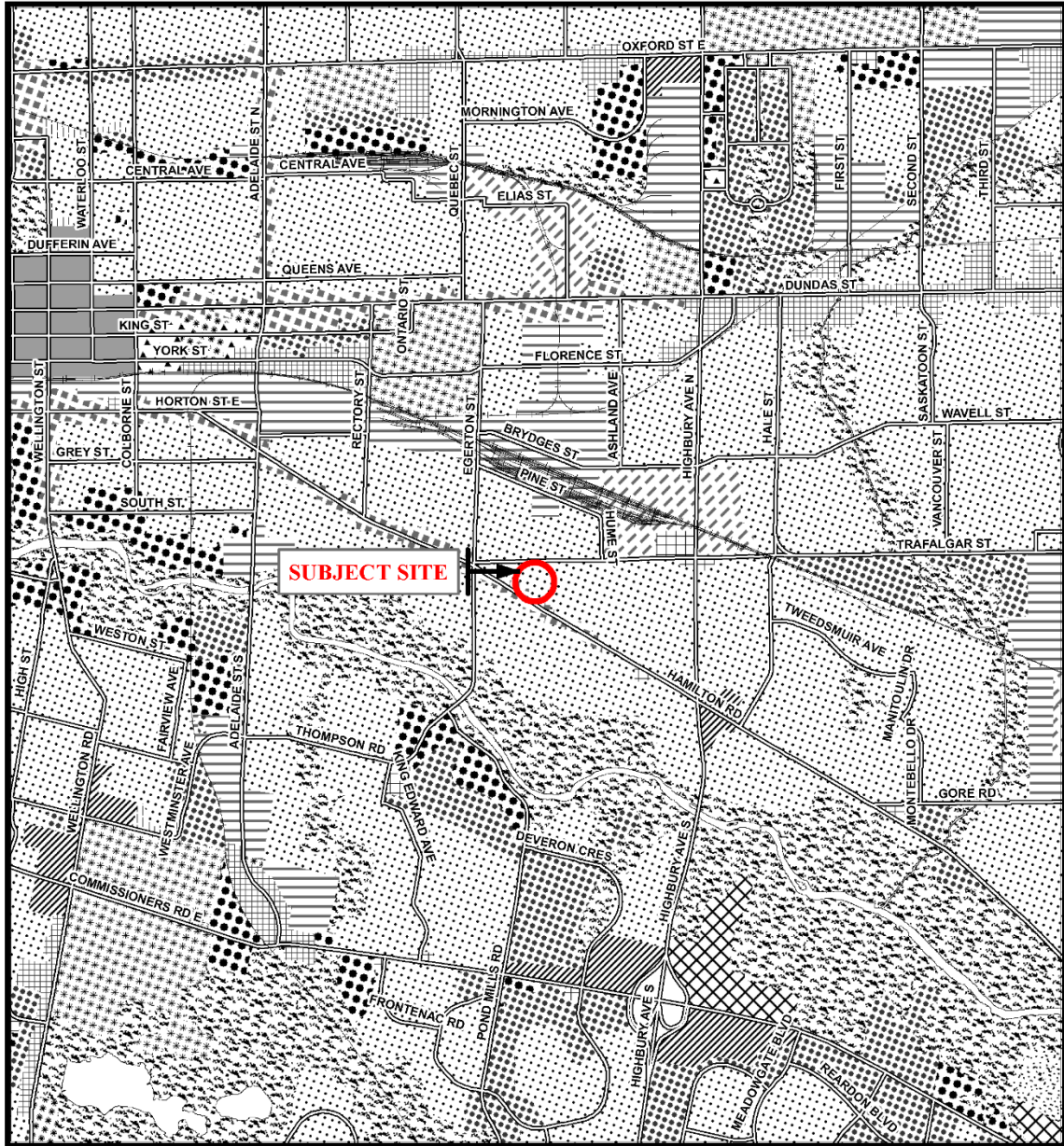
File Number: OZ-9496

Planner: LM

Technician: RC

Date: June 16, 2022





**Legend**

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

**CITY OF LONDON**

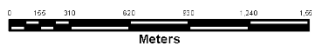
Planning Services /  
Development Services

OFFICIAL PLAN SCHEDULE A  
- LANDUSE -

PREPARED BY: Graphics and Information Services



Scale 1:30,000

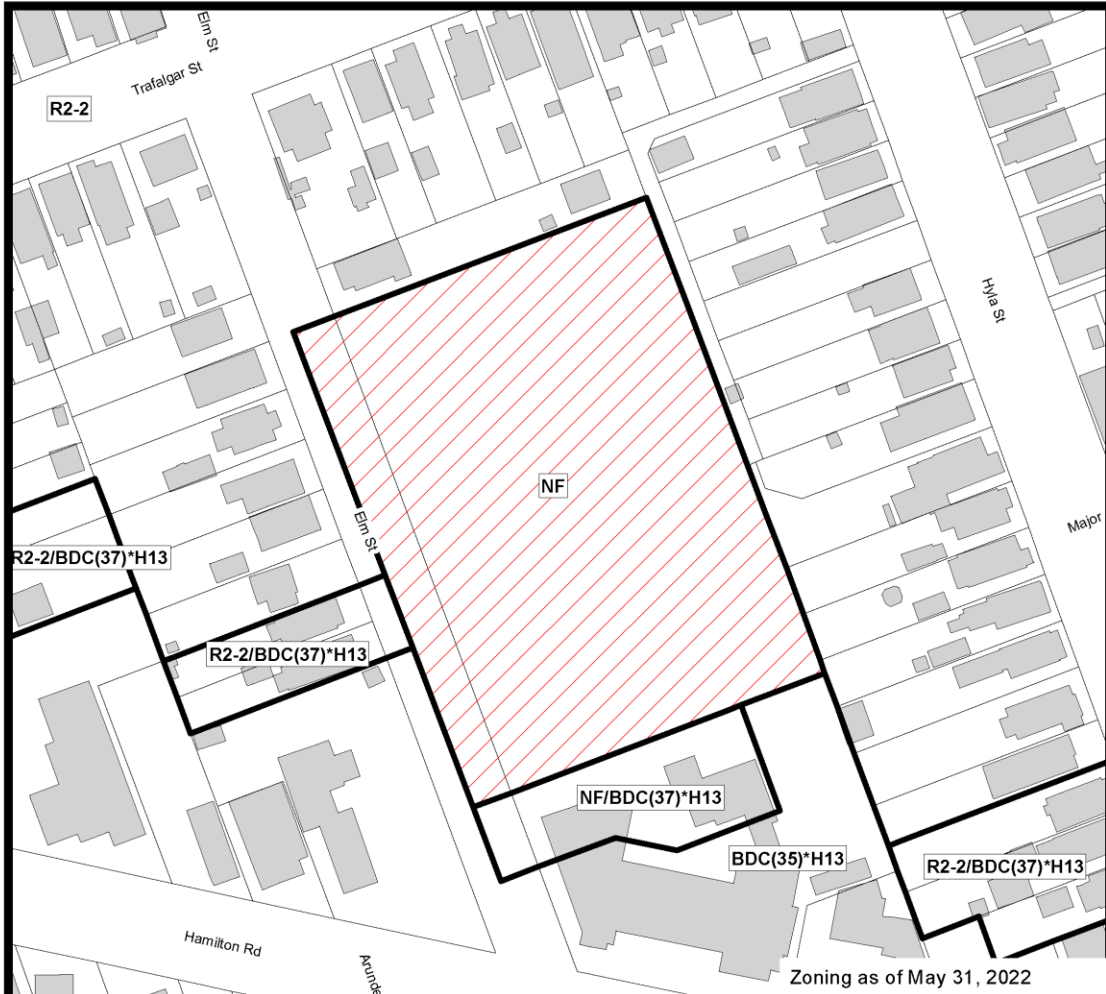


FILE NUMBER: OZ-9496

PLANNER: LM

TECHNICIAN: RC

DATE: 2022/06/16



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

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

- |   |                                   |
|---|-----------------------------------|
| R1 - SINGLE DETACHED DWELLINGS            | RF - REGIONAL FACILITY            |
| R2 - SINGLE AND TWO UNIT DWELLINGS        | CF - COMMUNITY FACILITY           |
| R3 - SINGLE TO FOUR UNIT DWELLINGS        | NF - NEIGHBOURHOOD FACILITY       |
| R4 - STREET TOWNHOUSE                     | HER - HERITAGE                    |
| R5 - CLUSTER TOWNHOUSE                    | DC - DAY CARE                     |
| R6 - CLUSTER HOUSING ALL FORMS            |                                   |
| R7 - SENIOR'S HOUSING                     | OS - OPEN SPACE                   |
| R8 - MEDIUM DENSITY/LOW RISE APTS.        | CR - COMMERCIAL RECREATION        |
| R9 - MEDIUM TO HIGH DENSITY APTS.         | ER - ENVIRONMENTAL REVIEW         |
| R10 - HIGH DENSITY APARTMENTS             |                                   |
| R11 - LODGING HOUSE                       | OB - OFFICE BUSINESS PARK         |
|   | LI - LIGHT INDUSTRIAL             |
| DA - DOWNTOWN AREA                        | GI - GENERAL INDUSTRIAL           |
| RSA - REGIONAL SHOPPING AREA              | HI - HEAVY INDUSTRIAL             |
| CSA - COMMUNITY SHOPPING AREA             | EX - RESOURCE EXTRACTIVE          |
| NSA - NEIGHBOURHOOD SHOPPING AREA         | UR - URBAN RESERVE                |
| BDC - BUSINESS DISTRICT COMMERCIAL        |                                   |
| AC - ARTERIAL COMMERCIAL                  | AG - AGRICULTURAL                 |
| HS - HIGHWAY SERVICE COMMERCIAL           | AGC - AGRICULTURAL COMMERCIAL     |
| RSC - RESTRICTED SERVICE COMMERCIAL       | RRC - RURAL SETTLEMENT COMMERCIAL |
| CC - CONVENIENCE COMMERCIAL               | TGS - TEMPORARY GARDEN SUITE      |
| SS - AUTOMOBILE SERVICE STATION           | RT - RAIL TRANSPORTATION          |
| ASA - ASSOCIATED SHOPPING AREA COMMERCIAL |                                   |
| OR - OFFICE/RESIDENTIAL                   | "h" - HOLDING SYMBOL              |
| OC - OFFICE CONVERSION                    | "D" - DENSITY SYMBOL              |
| RO - RESTRICTED OFFICE                    | "H" - HEIGHT SYMBOL               |
| OF - OFFICE                               | "B" - BONUS SYMBOL                |
|   | "T" - TEMPORARY USE SYMBOL        |

**CITY OF LONDON**

PLANNING SERVICES / DEVELOPMENT SERVICES

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



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

FILE NO:

OZ-9496

LM

MAP PREPARED:

2022/06/16

RC

1:1,250

0 5 10 20 30 40

Meters

## Urban Design Peer Review Panel Comments – Applicant Response

Address of Development Site: 18 Elm Street

Date of Panel Meeting: 03-16-2022 **Comment:**

The UDPRP commends the design team for a thoughtful, detailed and comprehensive design proposal. The Panel sincerely appreciates the sophistication and high degree of design development evident within this development application and associated presentation.

**Applicant Response:**

Noted.

**Comment:**

The UDPRP perceived the outdoor amenity space as an exciting and dynamic space. However it was thought this space should continue and flow through the pick-up / drop-off lane. This could be possibly done as a woonerf by using bollards and tactile warning pavers to delineate the edges of the vehicular way, while the paving material could continue through the laneway.

**Applicant Response:**

The applicant appreciates this idea of a continuous courtyard / drop-off area with carefully delineated edges. The courtyard design will be updated to incorporate these comments for the Site Plan submission.

**Comment:**

Acknowledging that the layout and composition of outdoor daycare space is largely tenant driven, the applicant is encouraged to look at opportunities to breakdown the numerous fences creating individualized play areas and instead create larger, programmable “flex-space”.

**Applicant Response:**

As allowed by the Day Nurseries Act, the applicant will endeavor to work with the as yet to be secured day care operator, to incorporate these comments, creating individualized play areas within a larger “flex-space”.

**Comment:**

The UDPRP applauds the design team for providing a commendable streetscape design along the Elm Street frontage. The powerful three meter landscape strip was envisioned to provide ample softening and contrast to the hard lines of the buildings architecture. The foundation plantings, rhythmic spacing of street trees and canopy overhang were thought to emphasize the building entrance along the main street, providing a clear wayfinding cue for building users.

**Applicant Response:**

Noted.

**Comment:**

The UDPRP understands from the applicants presentation that garbage pick-up will be by means of garbage bins stored internal to the building and brought outside to the garbage pick-up location on pick-up day. As such, the applicant is encouraged to reconsider the location of the garbage room currently located directly adjacent the entrance vestibule. The Panel also speculated that if the garbage truck route could be reduced or combined with the driving isle in the parking area then potential conflicts with the adjacent “island” amenity area could be avoided.

**Applicant Response:**

The applicant acknowledges the location of the garbage room is not ideal in consideration of the courtyard design, but the applicant is also of the belief that this arrangement is a very good outcome for the given site and program. The residential component of the building will only have access to the central circulation/vestibule after hours. Therefore, the garbage room must be located adjacent to this circulation area in order to be reasonably accessible to tenants using the garbage chute and elevator. It is also the only location in the building accessible to the three different occupancies at all times of day. The outdoor garbage pickup location is the result of extensive landscape, parking and loading studies, the result of which has significantly maximized landscape space and minimized parking and drive aisles for the required number of parking spaces. Reduced/alternative/combined pickup locations would result in the truck having to back out of the site across the public sidewalk.

**Comment:**

The applicant is encouraged to rethink the location of the drop-off area and garbage pick-up. These elements were thought to detract from the otherwise wonderful courtyard and outdoor amenity space. It was thought that the drop off area could be located along the South facade and the displaced parking could be placed across from the single loaded parking isle.

**Applicant Response:**

Noted and appreciated. Parking, drop-off and garbage pickup locations have been reviewed extensively with the intent of maximizing landscape amenity space. The applicant has tested the drop off on the south face of the building. This solution results in an overall reduction of landscape space and increased paved surface exclusively for vehicular use. It displaces parking to landscape space and requires a drive aisle exclusively to allow vehicles to circulate through the site to the drop off. A hammerhead turn within the space of the drive aisles is not expected to serve the drop-off adequately.

**Comment:**

Although the UDPRP acknowledges that the public park will likely be designed and constructed by the City of London, it should be noted that the applicant and City should explore different sized play areas to enable use of different play equipment, catering to different age groups. Having plant beds straddle the North property line adjacent the park was thought to be undesirable due to ongoing maintenance and ownership concerns. The Panel suggests providing some form of pronounced landscape edge to delineate the separation of public park from private property and buffer the transition.

**Applicant Response:**

The applicant agrees with the received comments. It is the applicants understanding that the park will be designed collaboratively with the City, however, once the land is deeded to the City, the park will be in the control of the City Parks Department. For Site Plan, the overlapping border planting will be eliminated. A secure edge will be provided between the park and daycare, and the building entry corner will be developed with the intent of creating a conceptual address on the park. A proposed park design will not be provided for Site Plan.

Form Completed By: Tim Wickens