Report to Planning and Environment Committee

To: **Chair and Members**
Planning and Environment Committee
From: **Scott Mathers, MPA, P. Eng.**
Deputy City Manager, Planning and Economic Development
Subject: **Zelinka Priamo on behalf of Copia Developments**
608 Commissioners Road - Ward 10
Public Participation Meeting
Date: **January 30, 2023**

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of Zelinka Priamo on behalf of Copia Developments relating to the property located at 608 Commissioners Road West:

(a) the proposed by-law attached hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting February 14, 2023 to amend Zoning By-law No. Z.-1, in conformity with The London Plan for the City of London, to change the zoning of the subject property **FROM** a Residential (R1-9) Zone **TO** a Residential R8 Special Provision (R8-4(_)) Zone;

(b) **IT BEING NOTED** that the following urban design and site plan matters were raised during the application review process for consideration by the Site Plan Approval Authority:

i. Verify the trees along the south property line position and the relation of their trunks to the property lines shared with 659 and 615 Westmount Crescent for possible consent by the neighbouring property owner to remove boundary tree(s) or cause injury to a boundary tree(s);
ii. Provide a building step back above the 5th storey along Commissioners Road West as per the drawings dated October 11, 2022;
iii. Provide a building step back above the 4th storey along Westmount Crescent to provide appropriate height transition from abutting low-density residential as per the drawings dated October 11, 2022;
iv. Provide detailed site plan and landscape plans to detail any proposed programming in the amenity space to demonstrate how it functions and relates to the building interface at the rear;
v. Provide interior floor plans to demonstrate how the interior spaces will relate to the exterior functions; and
vi. Explore ways to re-locate or screen the garbage moloks near the main entrance.

(c) pursuant to Section 34(17) of the *Planning Act*, as determined by the Municipal Council, no further notice **BE GIVEN** in respect of the proposed by-law as the recommended zoning generally implements the site concept submitted with the application. As part of the application review process a revised site plan concept was submitted with minor revisions including a new height of 22.0 metres; however, which is still within the 6 storeys as originally proposed.

Executive Summary

On December 13, 2022, Municipal Council deferred consideration of the proposed Zoning By-law amendment for 608 Commissioners Road W, and referred the item back to staff to further review the traffic patterns, the access point, and the intensification of the proposed development:

I hereby certify that the Municipal Council, at its meeting held on December 13, 2022 resolved:

That the application by Copia Developments, relating to the property located at 608 Commissioners Road West, BE REFERRED back to the Civic Administration to review the traffic patterns, the access points and the intensification for the proposed development.

Traffic Patterns and Access Point

After further review and consultation with the Transportation Division they have provided additional comments reflecting traffic patterns and access:

The proposed development is anticipated to generate 33 and 42 additional trips in the AM and PM peak hours respectively. The TIA assumes that 100% of these trips will be to/from Commissioners Rd via Westmount Cres, however it's reasonable to assume that a very small percentage of these trips may be to/from the south via Westmount Cres.

The development is proposed to have access off Westmount Cres. Access off Commissioners Rd is not recommended. Commissioners Rd is classified as a Civic Boulevard (ie arterial) and the average annual daily traffic (AADT) on this section of roadway is approximately 13,000. Commissioners Rd from Wonderland to Cranbrook is scheduled for a 2 to 4 lane upgrade in 2033.

The primary function of an arterial roadway like Commissioners Rd is to move higher volumes of traffic as safely and efficiently as possible and one of the ways we are able to achieve this is to minimize the number of access points to/from an arterial. Every additional access point introduces additional conflict points (ie. crossing paths of traffic) which has a negative impact on the flow of traffic and increases the risk of a collision.

Westmount Cres is classified as a neighbourhood street. The main function of a neighbourhood street is to provide access to adjacent lands. It is the preferred location for access to the proposed development. Providing an access off Commissioners Rd would not prevent drivers from making a right onto Westmount Cres to go southbound. Where appropriate, left turn restrictions can be implemented, but it's generally not feasible to restrict right turn movements. Based on the number of trips anticipated to be generated by this development a very low number of trips to the south via Westmount Cres are anticipated.

In addition, the Transportation Impact Assessment submitted with the application concluded there would be no problems with the increase of traffic from this development and the only recommendation was to construct a westbound left-turn lane with 25 metre storage on Commissioners Road West and Westmount Crescent.

Based on this further review, Staff maintain the position that the increase in traffic will have minimal impacts in the area and can be accommodated given existing traffic volumes in the area. Additionally, the proposed access off Westmount Crescent is the preferred location given the City's goals to limit access points to and from arterial roads and that an access point off Commissioners Road would not result in any reduction in potential southbound traffic on Westmount Cres.

Intensification

After a further review of the intensity of the proposed development, staff are still satisfied the proposed intensity and scale of the proposed development is appropriate and is in conformity with The London Plan. The proposed apartment building can be developed on the subject lands in a way that is appropriate for the site and adjacent neighbourhood.

The proposed form of development has made a strong effort to maintain a scale and rhythm that responds to the surrounding land uses, and that the location and massing of

the proposed building is consistent with urban design goals of The London Plan. The building is proposed to be situated close to the intersection of Commissioners Road W and Westmount Crescent in order to define the street edge and encouraging a street-oriented design which includes ground floor entrances facing the streets creating a street presence that is appropriate with the surrounding context. The main entrance and lobby for the proposed residential units will be located in close proximity to the Commissioners Road frontage This along with the building location will create an animated and vibrant street frontage that interacts well with the existing mature trees, the public sidewalks, creating a strong street presence and providing an interactive realm along both streets.

The overall development uses building articulation, rhythm, materials, fenestration, step backs and balconies along the public street frontage to help reduce the overall massing of the buildings and create a pleasant and interesting pedestrian environment while reducing large expanses of blank walls along the street and internal to the site. The 6-storey height of the proposed building is higher than the low density residential in the area; however, as noted, the highest heights of the devleopment are located at the intersection and along the Civic Boulevard with approriate step backs transitioning down to 4 and 5-storeys as the development meets the surrounding low rise community. Futher to this, no special provisions are required for any setbacks for this development.

The subject site is in an area where The London Plan directs and support residential intensification and redevelopment. The proposal is considered in keeping with the intensity policies set out by The London Plan.

Conclusion

Staff have reviewed the original recommendation and report and continue to support the original recommendation. The recommended amendment is consistent with the Provincial Policy Statement, 2020 and conforms to the in-force policies of The London Plan, including but not limited to the Key Directions and the Neighbourhoods Place Type. The recommended amendment will facilitate the development of an underutilized site within the Built-Area Boundary with a land use, intensity, and form that is appropriate for the site.

Prepared by:	**Alanna Riley, MCIP, RPP** **Senior Planner, Planning Implementation**
Reviewed by:	**Mike Corby, MCIP, RPP** **Manager, Planning Implementation**
Recommended by:	**Heather McNeely MCIP, RPP** **Director, Planning and Development**
Submitted by:	**Scott Mathers MPA, P. Eng.,** **Deputy City Manager, Planning and Economic Development**

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 and Economic Development.

Cc: Britt O'Hagan, Manager, Urban Design
Michael Pease, Manager, Site Plans
Ismail Abushehada, Manager, Development Engineering

Appendix A

Bill No.(number to be inserted by Clerk's Office)
2023

By-law No. Z.-1-23_____

A by-law to amend By-law No. Z.-1 to rezone an area of land located at 608 Commissioners Road West.

WHEREAS Copia Developments has applied to rezone an area of land located at 608 Commissioners Road West, 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 the lands located at 608 Commissioners Road West, as shown on the attached map comprising part of Key Map No.(A106), from a Residential R1 (R1-9) Zone **TO** a Residential R8 Special Provision (R8-4(_)) Zone.

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

) R8-4(_) 608 Commissioners Road West

a) Regulations

i) Height (Maximum) 22.0 metres

ii) Density (Maximum) 215 Units per hectare (uph)

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.

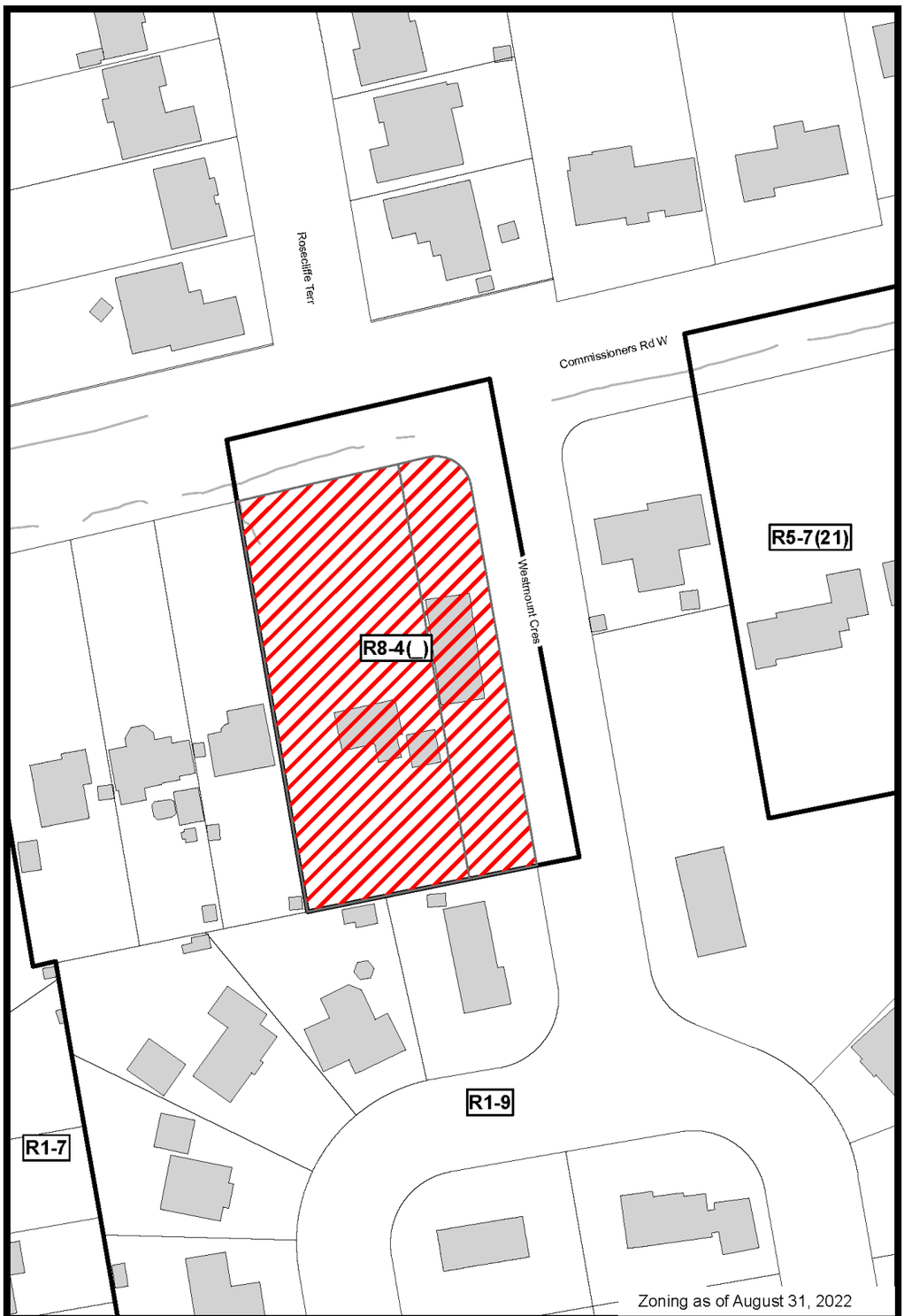
PASSED in Open Council on February 14, 2023.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – February 14, 2023
Second Reading – February 14, 2023
Third Reading – February 14, 2023.

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



File Number: Z-9516

Planner: AR

Date Prepared: 2022/10/25

Technician: JI

By-Law No: Z.-1-

SUBJECT SITE

1:1,000

0 5 10 20 30 40 Meters

Geodatabase

Appendix B – Original Report

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:	**608 Commissioners Rd W** **Public Participation Meeting**
Date:	**November 28, 2022**

Recommendation

That, on the recommendation of the Acting Director, Planning and Development, the following actions be taken with respect to the application of Copia Developments relating to the property located at 608 Commissioners Road West:

(d) the proposed by-law attached hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting December 13, 2022 to amend Zoning By-law No. Z.-1, in conformity with The London Plan for the City of London, to change the zoning of the subject property **FROM** a Residential (R1-9) Zone **TO** a Residential R8 Special Provision (R8-4(_)) Zone;

(e) **IT BEING NOTED** that the following urban design and site plan matters were raised during the application review process for consideration by the Site Plan Approval Authority:

i. Verify the trees along the south property line position and the relation of their trunks to the property lines shared with 659 and 615 Westmount Crescent for possible consent by the neighbouring property owner to remove boundary tree(s) or cause injury to a boundary tree(s);
ii. Provide a building step back above the 5th storey along Commissioners Road West as per the drawings dated October 11, 2022;
iii. Provide a building step back above the 4th storey along Westmount Crescent to provide appropriate height transition from abutting low-density residential as per the drawings dated October 11, 2022;
iv. Provide detailed site plan and landscape plans to detail any proposed programming in the amenity space to demonstrate how it functions and relates to the building interface at the rear;
v. Provide interior floor plans to demonstrate how the interior spaces will relate to the exterior functions; and
vi. Explore ways to re-locate or screen the garbage moloks near the main entrance.

(f) pursuant to Section 34(17) of the *Planning Act*, as determined by the Municipal Council, no further notice **BE GIVEN** in respect of the proposed by-law as the recommended zoning generally implements the site concept submitted with the application. As part of the application review process a revised site plan concept was submitted with minor revisions including a new height of 22.0 metres; however, which is still within the 6 storeys as originally proposed.

Executive Summary

Summary of Request

The applicant has requested to rezone the subject site to permit the development of a 6-storey apartment building with step backs, containing 95 dwelling units, which is equivalent to a density of 215 units per hectare.

Purpose and Effect of Recommended Action

The purpose and effect of the recommended action is to rezone the subject site to a Residential R8 Special Provision (R8-4(_)) Zone providing apartment buildings that will permit the proposed development. The following special provisions would facilitate the proposed development: a maximum height of 22.0 metres and a maximum density of 215 units per hectare.

Rationale of Recommended Action

1. The recommended amendment is consistent with the Provincial Policy Statement, 2020, which encourages the regeneration of settlement areas and land use patterns within settlement areas that provide for a range of uses and opportunities for intensification and redevelopment. The PPS directs municipalities to permit all forms of housing required to meet the needs of all residents, present and future.
2. The recommended amendment conforms to the in-force policies of The London Plan including but not limited to, Our City, Key Directions, City Design and City Building, Neighbourhood Place Type and will facilitate a built form that contributes to achieving a compact, mixed-use City.
3. The recommended amendment would permit development at an intensity that is appropriate for the site and the surrounding neighbourhood.
4. The recommended amendment facilitates the development of an underutilized property within the Built-Area Boundary through an appropriate form of infill development.
5. The recommended amendment facilitates a type of residential development that will help to address the growing need for affordable housing in London. The recommended amendment is in alignment with the Housing Stability Action Plan 2019-2024 and Strategic Area of Focus 2: Create More Housing Stock.

Linkage to the Corporate Strategic Plan

Building a Sustainable City – London’s growth and development is well planned and sustainable over the long term.

Climate Emergency

On April 23, 2019, Council declared a Climate Emergency. Through this declaration the City is committed to reducing and mitigating climate change by encouraging intensification and growth at appropriate locations. This includes efficient use of existing urban lands and infrastructure. It also includes aligning land use planning with transportation planning to facilitate transit-supportive developments and encourage active transportation

Analysis

1.0 Background Information

1.1 Previous Reports Related to this Matter

None.

1.2 Planning History

None.

1.3 Property Description

The subject site is located on the southwest intersection of Commissioners Road West and Westmount Crescent in the Westmount Planning District. Currently situated on the subject site are two single storey detached dwellings. The site consists of a grassed area with relatively flat topography with several mature trees located on the periphery of the site.

Commissioners Road W is an arterial road with an average daily traffic volume of 13,000 vehicles per day.

Figure 1: 608 Commissioners Road W facing south (Google image, June 2021)

1.4 Current Planning Information

- The London Plan Place Type – Neighbourhoods fronting a Civic Boulevard (Commissioners Road West)
- Existing Zoning – Residential R1 (R1-9) Zone

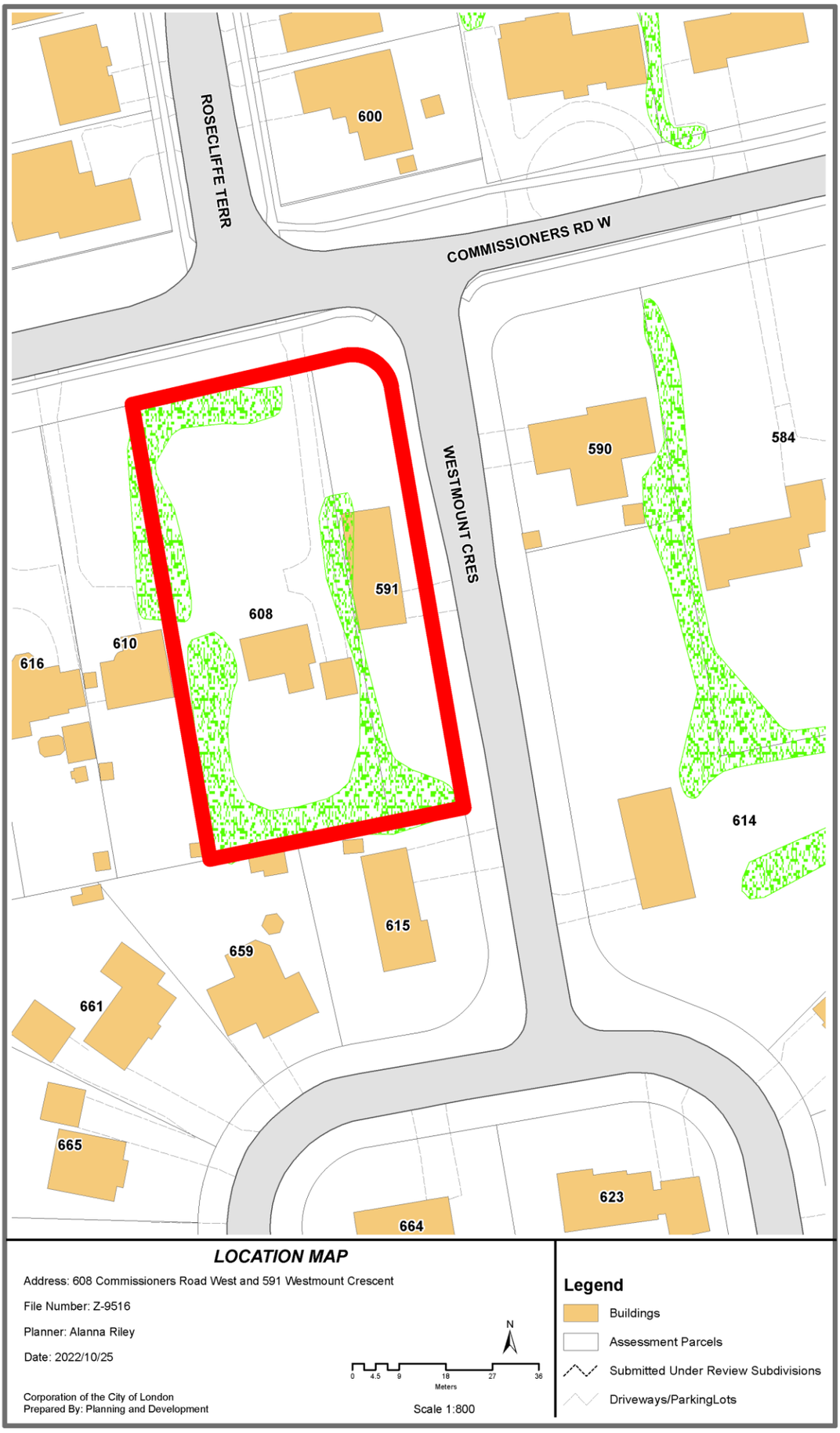
1.5 Site Characteristics

- Current Land Use – Two single detached dwellings
- Frontage – 42.91 metres
- Depth – 83.65 metres
- Area – 2.10 hectares
- Shape – Rectangular

1.6 Surrounding Land Uses

- North – Commissioners Road West, Low Density Residential
- East – Low Density Residential
- South – Low Density Residential
- West – Low Density Residential

1.7 Location Map



1.8 Intensification

The proposed 95 residential units represent intensification just outside of the Primary Transit Area but within the Built-Area Boundary.

2.0 Discussion and Considerations

2.1 Development Proposal

On June 6, 2022, the City accepted a complete application that proposed a 6-storey, L-shaped apartment building, containing 95 dwelling units, equating to 212 units per hectare, fronting Commissioners Road W. Vehicular access to the site is proposed to be provided by a single right-in, right-out driveway from Westmount Crescent and will be located near the south property line. Common outdoor amenity area is proposed on the northwest corner of the property with landscaping along the front, west and south property lines. 98 parking spaces are proposed in a parking garage located to the south and surface parking to the west. At the time of the application the applicant requested a bonus zone in return for enhanced urban design and, specifically affordable housing. The original site concept plan and rendering are shown in Figure 2 and Figure 3 below.

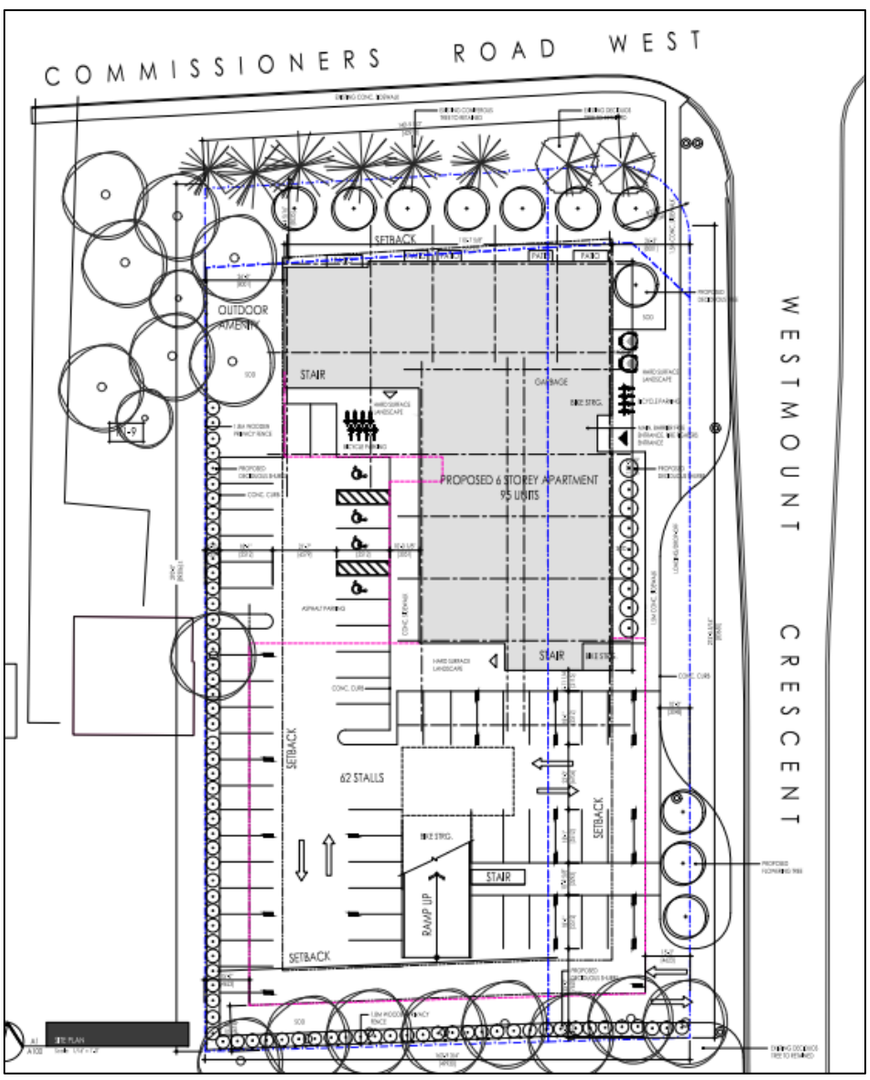


Figure 2: Original Site Concept Plan

Figure 3: Original Rendering

Figure 4: Proposed Development within the context of the surrounding area

2.2 Revised Development Proposal

Recently the applicant has made some changes to the design and layout of the proposal as part of a response to Urban Design Peer Review Panel and Urban Design comments, and public concerns. A revised application was submitted on October 6, 2022, which include the following changes:

- The parking garage has been removed and parking is now proposed to be underground together with surface parking at the rear;
- The proposed building now complies with all the required setbacks of the proposed zone;
- A larger outdoor amenity area has been provided;
- Pedestrian connections from ground level units to the sidewalks have been incorporated;
- There is a building step back down to 5 storeys on the west portion of the building along Commissioners Road W and a buildings step back down to 4 storeys at the rear along Westmount Crescent to provide for a transition to adjacent uses.

- The main building entrance is located proximate to Commissioners Road W; and
- A sufficient width for landscaping has been provided along the perimeter of the site.

It should be noted that the applicant still intends on providing five (5) affordable housing units. The revised site concept plan and rendering are shown in Figure 5, Figure 6 and Figure 7 below.

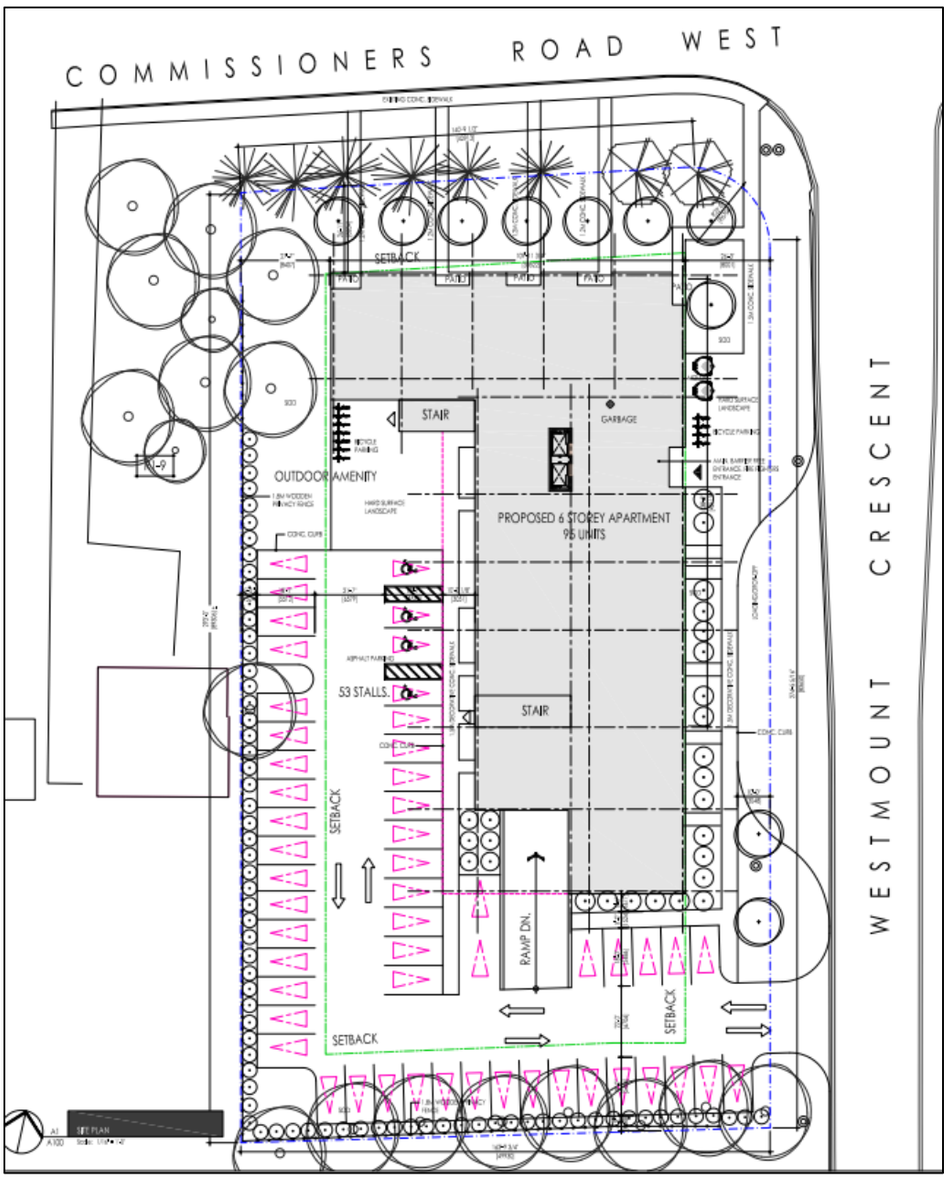


Figure 5: Revised Site Concept Plan

Figure 6: Revised Rendering

Figure 7: Revised Proposed Development within the context of the surrounding area

2.3 Original Requested Amendment

The applicant originally requested a Residential R8 Special Provision (R8-4(_)*B( )) Bonus Zone, which permits apartment buildings, lodging house class 2, senior citizen's apartment buildings, handicapped persons apartment buildings, continuum-of-care facilities. Requested special provisions included a minimum exterior side yard setback 4.5 metre setback whereas 7.0m is required; permit a minimum interior side yard setback of 8.0 metres, whereas 8.4 metres is required; permit a height of 21.0 metres whereas 12.0 metres is required; minimum parking spaces of 98 whereas 129 spaces are required; and a maximum lot coverage of 50% whereas 40% is required. The proposed bonus zone would permit a maximum density of 215 units per hectare in return enhanced urban design and, specifically affordable housing outlined in Section 19.4.4 of the 1989 Official Plan and policies 1638_ to 1655_ of The London Plan.

2.4 Revised Requested Amendment

The applicant's revised request includes a Residential R8 Special Provision (R8-4(_)) Zone, which permits apartment buildings, lodging house class 2, senior citizen's

apartment buildings, handicapped persons apartment buildings, continuum-of-care facilities. Special provisions include a height of 22.0 metres whereas 12.0 metres is required; and density of 215 units per hectare whereas 75 units per hectare is permitted. Since the time of the original application Bonus zoning is no longer an available tool under the *Planning Act* and can no longer be considered as part of this application; therefore, the request for a Bonus Zone has been removed from the revised zoning amendment.

2.5 Community Engagement (see more detail in Appendix B)

Through the community engagement process, seventeen written responses were received from members of the public and one petition with 122 names.

The public's concerns were related to the following matters:

- Height
- Density
- Lack of street lighting and sidewalk facilities
- Privacy/Overlook
- Light/Noise impacts
- Traffic
- Parking
- Loss of property value

It should be noted that the applicant held two community meetings with the public on July 6, 2022 and November 2, 2022.

2.6 Policy Context

Provincial Policy Statement, 2020

The Provincial Policy Statement 2020 provides policy direction on matters of provincial interest related to land use and development. Section 1.1 "Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns" of the PPS encourages healthy, livable, and safe communities over the long-term. These communities must be sustained through a number of measures, including: accommodating an appropriate range and mix of affordable and market-based types of residential land uses, as well as employment, institutional, recreation and open space land uses (s. 1.1.1.b); promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs (s. 1.1.1.e).

The PPS encourages areas inside the urban growth boundary (i.e. "settlement areas" per s. 1.1.3 Settlement Areas) to be the main focus of growth and development, including opportunities for intensification and redevelopment. Appropriate land use patterns within urban growth boundaries are established by providing appropriate densities and mix of land uses that efficiently use land and resources along with the surrounding infrastructure, public services facilities and are also transit-supportive (s.1.1.3.2).

Municipalities are required to identify and promote opportunities for intensification and redevelopment, taking into consideration an area's existing building stock (s. 1.1.3.3), accommodating a significant supply and range of housing options, including various housing types, densities, and a variety of affordable and market-based housing arrangements (s. 1.1.3.3), promoting development standards which facilitate intensification, redevelopment and compact form (s. 1.1.3.4).

The PPS 2020 also requires that municipalities provide an appropriate range and mix of affordable and market-based housing options and densities to meet projected requirements of current and future residents (s. 1.4.1). It directs planning authorities to

permit and facilitate growth through lands available for residential intensification and redevelopment within the existing built-up areas.

The PPS also encourages the range and mix of affordable and market-based housing to be built at densities that meet projected needs, by establishing targets for affordable housing (s. 1.4.3.a). Planning authorities are also required to permit and facilitate all housing options and all types of residential intensification.

The London Plan

The London Plan is the new Official Plan for the City of London. On May 25th, 2022, an Ontario Land Tribunal decision resolved all remaining policy appeals within The London Plan, effectively bringing The London Plan into full force and effect. Any applications in process prior to the May 25th date should continue uninterrupted as per the "clergy principle" (the policies that were in force at the time the application was received will continue to direct that application). Both the 1989 Official Plan and The London Plan policies would have been considered as part of this analysis; however, the application was revised October 6, 2022 and, therefore, will only be reviewed under The London Plan policies.

The London Plan provides Key Directions (54_) that must be considered to help the City effectively achieve its vision. These directions give focus and a clear path that will lead to the transformation of London that has been collectively envisioned for 2035. Under each key direction, a list of planning strategies is presented. These strategies serve as a foundation to the policies of the plan and will guide planning and development over the next 20 years. Relevant Key Directions are outlined below.

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

- Planning to achieve a compact, contiguous pattern of growth – looking "inward and upward";
- Planning for infill and intensification of various types and forms to take advantage of existing services and facilities and to reduce our need to grow outward; and,
- Ensure a mix of housing types within our neighbourhoods so that they are complete and support aging in place. (Key Direction #5, Directions 2, 4 and 5).

The London Plan also provides direction to build strong, healthy and attractive neighbourhoods for everyone by:

- Integrating affordable forms of housing in all neighbourhoods (Key Direction #7).
- Design complete neighbourhoods by meeting the needs of people of all ages, incomes and abilities, allowing for aging in place and accessibility to amenities, facilities and services (Key Direction #7).

The London Plan also provides direction to make wise planning decisions by:

- Plan for sustainability – balance economic, environmental, and social considerations in all planning decisions. (Key Direction #8, Direction 1).

The site is in the Neighbourhoods Place Type fronting on a Civic Boulevard (Commissioners Road West) and a Neighbourhood Connector (Westmount Crescent) as identified on Map 1 – Place Types and Map 3 – Street Classifications. The permitted uses within the Neighbourhoods Place Type at this location include a range of low and mid density residential dwelling types, including low-rise apartment buildings, which are permitted to an upper maximum height of 6-storeys. (Table 10 – Range of Permitted Uses in Neighbourhoods Place Type) (Table 11 – Range of Permitted Heights in Neighbourhoods Place Type).

The London Plan height framework promotes intensification along higher order streets. Specifically, Policy 919_ 2 and 3 speaks to the range of uses and intensity permitted will be related to the classification of the street. Properties fronting onto major streets may allow for a broader range of uses and more intense forms of development than those fronting onto minor streets.

3.0 Financial Impact/Considerations

There are no direct municipal financial expenditures associated with this application.

4.0 Key Issues and Considerations

4.1 Issue and Consideration #1: Provincial Policy Statement, 2020

The Provincial Policy Statement (PPS) 2020 provides policy direction on matters of provincial interest related to land use planning and development. In accordance with Section 3 of the *Planning Act*, all planning decisions “shall be consistent with” the PPS.

The PPS encourages an appropriate affordable and market-based range and mix of residential types, including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons to meet long-term needs (1.1.1b)). The PPS also promotes the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs (1.1.1e)).

The PPS directs settlement areas to be the focus of growth and development. Land use patterns within settlement areas shall be based on densities and a mix of land uses which: efficiently use land and resources; are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion; minimize negative impacts to air quality and climate change, and promote energy efficiency; prepare for the impacts of a changing climate; support active transportation and are transit-supportive, where transit is planned, exists or may be developed (1.1.3.2). Land use patterns within settlement areas shall also be based on a range of uses and opportunities for intensification and redevelopment (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, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs (1.1.3.3). The PPS is supportive of development standards which facilitate intensification, redevelopment and compact form (1.1.3.4). 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 as well as all types of residential intensification, including additional residential units and redevelopment (1.4.3b)). Densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed, are promoted by the PPS (1.4.3d)). 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 (1.7.1e)).

<u>Analysis</u>

Consistent with the PPS, the recommended apartment building will contribute to the existing range and mix of housing types in the area, which consists primarily of low density residential. Although the proposed development has a greater intensity and built form as compared to the existing surrounding neighbourhood context, it fronts along an arterial road, provides appropriate setbacks and incorporate transitioning design elements to adjacent uses.

The subject lands are of a size and configuration capable of accommodating a more intensive redevelopment on an underutilized site. No additional special provisions are required in terms of setbacks, open space, reduction in parking etc. which are all signs of potential over intensification of a property. The increased intensity of development on

the site will make use of existing transit services, nearby active and passive recreation opportunities, and commercial uses.

The recommended intensification of the subject property will provide choice and diversity in housing options for both current and future residents and will optimize the use of land and public investment in infrastructure in the area. Surrounded by a developed area of the City, the redevelopment and intensification of the subject lands would contribute to achieving more compact forms of growth.

4.2 Issue and Consideration #2: Use

The London Plan

Policy 916_3 of the Neighbourhoods Place Type identifies key elements for achieving the vision for neighbourhoods, which includes a diversity of housing choices allowing for affordability and giving people the opportunity to remain in their neighbourhoods as they age if they choose to do so. Furthermore, policy 918_2 states that neighbourhoods will be planned for diversity and mix of unit types and should avoid the broad segregation of different housing types, intensities, and forms. The development of the proposed 6-storey, apartment would contribute to a mix of housing types available in the area.

The subject site is in the Neighbourhoods Place Type of The London Plan fronting a Civic Boulevard (Commissioners Road West) and a Neighborhood Connector (Westmount Crescent). Table 10 - Range of Permitted uses in Neighbourhoods Place Type, shows the range of primary and secondary permitted uses that may be allowed based on the fronting street classification (921). At this location, Table 10 would permit a range of low- and mid-rise residential dwelling types, including low-rise apartment buildings (Table 10-Range of Permitted Uses in Neighbourhoods Place Type).

<u>Analysis:</u>

Under The London Plan Neighbourhood Place Type policies (916_3), the expectation is that apartment buildings are anticipated to be developed within neighbourhoods at appropriate locations which may also include affordable dwellings. These policies provide guidance to the situating of various residential types relative to the street classification. As noted, the subject site fronts onto a Civic Boulevard which permits low-rise apartments. The development of the proposed 6-storey, 95-unit apartment building would contribute to a mix of housing types and provides a more intrinsically affordable housing option in the community. Adjacent surrounding uses include low density residential with higher density residential uses generally along Commissioners Road and Wonderland Road S. In this context, an apartment is not out of place along an arterial road in the neighbourhood and its impact would be mitigable. Consistent with this surrounding context as well as the list of uses permitted in the policies, the recommended 6-storey apartment building is in keeping with the policies at this location.

Furthermore, the analysis of intensity and form below will demonstrate that the proposed apartment building can be developed on the subject lands in a way that is appropriate for the site and adjacent neighbourhood.

4.3 Issue and Consideration #2: Intensity

The London Plan

The London Plan contemplates residential intensification where appropriately located and provided in a way that is sensitive to and a good fit with existing neighbourhoods (83_, 937_, 939_ 5. and 6., and 953_ 1. and 2.). The London Plan directs that intensification may occur in all place types that allow for residential uses (84_).

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 of 4 storeys, with an upper limit of up to 6 storeys, is contemplated within the Neighbourhoods Place Type where a property has frontage on a Civic Boulevard (Table 11 – Range of Permitted Heights in

the Neighbourhoods Place Type). The intensity of development must be appropriate for the size of the lot (953_3.).

Analysis

The subject site has frontage on a Civic Boulevard, which is a higher-order street, to which higher-intensity uses are directed. The subject lands have access to four London Transit bus routes and is surrounded by a mix of low and medium residential uses. Also, the site is located within walking distance to some commercial and institutional uses with a significant commercial node including a grocery store, retailers, personal service establishments, restaurants/cafes, and a pharmacy to the east at the Commissioners Road West and Wonderland Road South intersection. Further to the south there are a broad range of uses including Westmount Mall, two places of worship, mid to high-rise apartment buildings, Saunders Secondary School, and more commercial development. There are several open space areas within approximately 5–10 minute walking distances such as Rosecliffe Park, Westmount Lions Park, Mitchell Park, Lyngate Grove Park and Viscount Woods. As this site is currently developed with two single detached dwellings, the proposed development represents an appropriate form of intensification through infill development. The current single detached dwellings represent an underutilization of the two lots within a developed area and the increased intensity of development on the site will make use of existing transit and public services in the area. The subject site is in an area where The London Plan directs and support residential intensification and redevelopment. The proposal is considered in keeping with the intensity policies set out by The London Plan. As such, staff is satisfied the proposed intensity and scale of development is in conformity with The London Plan.

4.4 Issue and Consideration #3: Form

The London Plan

The London Plan encourages compact forms of development as a means of planning and managing for growth (7_, 66_). The London Plan encourages growing “inward and upward” to achieve compact forms of development (59_ 2, 79_). The London Plan accommodates opportunities for infill and intensification of various types and forms (59_ 4). To manage outward growth, The London Plan encourages supporting infill and intensification in meaningful ways (59_8).

The London Plan also provides guidance on compatibility and fit with regards to form (Policy 953_). The applicant has provided a development concept (Figure 4) as part of a complete application to support and justify the form of development and its relationship to the neighbourhood.

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, considering such things as access points, driveways, landscaping, amenity areas, building location and parking; 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 (953_ 2.a. to f.). Specific City Design policies indicate that principal building entrances and transparent windows should be located to face the public right-of-way, to reinforce the public realm, establish an active frontage and provide convenient pedestrian access (291_). They also indicate that residential buildings should include outdoor amenity spaces (295_), and support reduced parking rates in place types and parts of the city that have high accessibility to transit (271_). The Our Tools section of The London Plan contains various considerations for the evaluation of all planning and development applications (1578_)

Analysis

Consistent with the London Plan, the recommended intensification of the subject properly would optimize the use of land and public investement in infrastructure in the

area. Located within a developed area of the City, the redevelopment and intensification of the subject lands for an apartment building would contribute to achieving a more compact form of growth and development than then the two single detached dwellings that currently occupy the site.

The proposed form of development has made a strong effort to maintain a scale and rhythm that responds to the surrounding land uses, and that the location and massing of the proposed building is consistent with urban design goals of The London Plan. The building is proposed to be situated close to the intersection of Commissioners Road W and Westmount Crescent in order to define the street edge and encouraging a street-oriented design which includes ground floor entrances facing the streets creating a street presence that is appropriate with the surrounding context. The main entrance and lobby for the proposed residential units will be located in close proximity to the Commissioners Road frontage This along with the building location will create an animated and vibrant street frontage that interacts well with the existing mature trees, the public sidewalks, creating a strong street presence and providing an interactive realm along both streets.

Adequate parking is provided for the proposed development, as required by the Zoning By-law and Site Plan Control By-Law. The underground and surface parking lot is accessible through the driveway from Westmount Crescent in the rear yard. Adequate space is provided around the edges of the parking lot to provide for appropriate screening of the parking from the street and adjacent to abutting properties. This will include trees and fencing that would screen the proposed building providing privacy for both residents and neighbours.

The overall development uses building articulation, rhythm, materials, fenestration, step backs and balconies along the public street frontage to help reduce the overall massing of the buildings and create a pleasant and interesting pedestrian environment while reducing large expanses of blank walls along the street and internal to the site. The 6-storey height of the proposed building is higher than the low density residential in the area; however, as noted, the highest heights of the devleopment are located at the intersection and along the Civic Boulevard with approriate step backs transitioning down to 4 and 5-storeys as the development meets the surrounding low rise community as shown below in Figures 8 and 9.

Figure 8: West along Westmount Crescent - Rendering

Figure 9: South along Commissioners Road W - Rendering

Comments from Urban Design staff and the Urban Design Peer Review Panel highlighted various considerations regarding the design of the apartment building propsal. The applicant took these considerations into account along with other staff concerns and public concerns, and, as mentioned, revised the proposal as outlined in section 2.2 above in this report. The applicant is commended for revising the proposal and providing a site and building design that incorporates an active-low rise built form along Commissioners Road W with walkway connections from from City sidewalk, providing an appropriately sized outdoor amenity space, providing step backs and large setbacks for a transition to the abutting low density residential, removing the parking garage and providing underground and surface parking located in the rear and screened from the road frontage, and exceptional design. Staff are satisfied that the Evaluation Criteria for Planning and Development Applications in the Our Tools part of The London Plan have been met through the recommended Zoning By-law amendment and can be further addressed through the site plan approval process.

The refinements illustrated on the revised site plan, rendering and elevations provide certainty with respect to appropriate building location and massing, centralized amenity space, buffering, parking lot design standards and exceptional design in order to establish suitable zoning regulations.

At the site plan approval stage, City staff will continue to refine these building and site design features with the applicant for implementation in the final approved drawings and development agreement, including:

i. Verify the trees along the south property line position and the relation of their trunks to the property lines shared with 659 and 615 Westmount Crescent for possible consent by the neighbouring property owner to remove boundary tree(s) or cause injury to a boundary tree(s);
ii. Provide a building step back above the 5th storey along Commissioners Road West as per the drawings dated October 11, 2022;
iii. Provide a building step back above the 4th storey along Westmount Crescent to provide appropriate height transition from abutting low-density residential as per the drawings dated October 11, 2022;
iv. Provide detailed site plan and landscape plans to detail any proposed programming in the amenity space to demonstrate how it functions and relates to the building interface at the rear;
v. Provide interior floor plans to demonstrate how the interior spaces will relate to the exterior functions; and

vi. Explore ways to re-locate or screen the garbage moloks near the main entrance.

These are the detailed matters summarized under clause c) of the staff recommendation for the Site Plan Approval Authority to consider through the site plan approval process.

4.5 Issue and Consideration #4: Zoning

The original proposed apartment building required many setbacks special provisions to facilitate the development. However, the revised development made sufficient changes to ensure no setback special provisions are required in an effort to respect the scale and privacy of the surrounding land uses. As a result, only two special provisions are required which include a height of 22.0 metres and density of 215 units per hectare. Staff have no concerns with these proposed special provisions as the proposed use, intensity and form is considered appropriate for the site and surrounding area and meets the intent of the urban design policies in The London Plan.

The proposed development is intended to make efficient use of the property and existing services while the associated density is appropriate given that the site can accommodate the building, adequate parking, landscaped space, outdoor amenity space, private amenity space and provide spatial separation with abutting uses.

4.6 Issue and Consideration #5: Affordable Housing

When the original application was submitted the applicant worked with the Housing Development Corporation (HDC) London through the application process for the provision of affordable housing through bonusing. The former Section 37 Density Bonusing permitted the City of London to authorize, under the *Planning Act*, increases in permitted height and/or density through the zoning bylaw in return for community benefits with the related bonusing policies in the 1989 Official Plan and The London Plan. In September 2022, provincial legislation ended the City's ability to collect those revenues. Instead, the City enacted a community benefits charge by-law to collect fees and fund a range of community services required as a result of new growth.

That being said, the applicant has indicated that they are willing to provide affordable housing units within the future development. Although Planning and Development Staff cannot ensure/require the applicant to enter into an agreement through a Zoning By-law amendment City Staff and the Housing Development Corporation have provided direction below as to what may be considered appropriate through a future agreement:

- A total of five (5) one-bedroom residential units will be provided for affordable housing;
- Rents not exceeding 80% of the Average Market Rent (AMR) for the London Census Metropolitan Area as determined by the CMHC at the time of building occupancy;
- The duration of affordability set at 50 years from the point of initial occupancy;
- The proponent enter into a Tenant Placement Agreement (TPA) with the City of London to align the affordable units with priority populations;
- These conditions to be secured through an agreement registered on title with associated compliance requirements and remedies.

NOTE: The provision of affordable housing was not considered as part of Staff's policy review and justification of the proposed land use as Staff cannot guarantee affordable housing units through this process.

4.7 Issue and Consideration #6: Public Concerns

Although many issues have been raised by the residents, many of the concerns can be generally grouped under several key headings - Traffic Impacts and Parking, Privacy

and Overlook, Sufficiency of Servicing Infrastructure, Buffering/Tree Removal, and Type of Tenancy.

Comments related to height, form, density and compatibility have been addressed in sections 4.1 through 4.4. of this report. Additional planning impact analysis has been provided under Appendix D of this report.

Traffic

Concerns were raised about the amount of traffic that would be generated by this development and that access is located off Westmount Crescent. Residents in the area are concerned about negative impacts on the neighbourhood in terms of increased traffic and safety.

As mentioned, Transportation did not have concerns with the proposed increase in traffic from the proposed development.

Additionally, Westmount Crescent is a neighbourhood street that serves a small number of dwelling units in the area, thus its traffic volumes are low. Neighbourhood streets are typically intended to accommodate traffic volumes up to approximately 1000 vehicles per day; however, this threshold varies by location, length of road, types of developments etc.

The City has developed a Traffic Calming and Procedures manual to assess when traffic calming measures are required. As per the point assessment table, volumes on local roads may become an issue when volumes reach 1500 vehicles a day. Based on the evaluation tools, the proposed development will not significantly affect the capacity of the local roads.

Privacy and Overlook

Members of the public expressed concerns about the height of the building leading to loss of privacy from people in the proposed building look out their windows, or when they use their terraces or balconies.

The development proposes the building to be placed closer to the Commissioners Road W frontage with the intent to reduce height impacts on the abutting lands, which also supports urban design principles, as well as design flexibility.

With respect to the privacy of yards to the south and west, the building is proposed to be set back approximately 37.85 metres from the south property line and 8.4 metres from the west. The placement of the proposed building allows for the surface parking infrastructure to be located in the rear yard which creates an appropriate separation between the proposed and existing buildings. In addition, the proposed plan provides for a buffer area that can accommodate enhanced, robust landscaping that will provide screening for the adjacent residential uses.

Buffering/Tree Removal

The use of landscaping, fencing and separation distances are helpful to screen development and soften the impacts of new construction. As identified above, the proposed building is meeting and exceeding the minimum required setbacks for the south and west property boundaries adjacent to existing residential uses, which in addition to providing physical distance separation, also provides space for buffering treatment. The east boundary is well vegetated and proposed to remain largely intact which allows the trees to provide a natural buffer. The east, west and south property boundaries are intended to have privacy fencing (ie- board on board) installed and plantings are also proposed along these property boundaries to provide for additional buffering above the fence height. Also, existing plantings along the perimeter are recommended to remain.

A Tree Inventory was prepared to identify the general type, health and/or significance of

trees on site. Site Plan Approval will allow for further discussion and refinement of the fencing treatment, and retention or enhanced plantings.

Type of Tenancy/Tenure

Several comments were made with respect to who will be living in the proposed development, and questions on whether or not this will be student housing. It's important to note that planning considerations cannot be made based on residential tenure. Type of tenancy and tenure (owner vs. rental) are not planning considerations when analyzing planning applications.

Conclusion

The recommended amendment is consistent with the Provincial Policy Statement, 2020 and conforms to the in-force policies of The London Plan, including but not limited to the Key Directions and the Neighbourhoods Place Type. The recommended amendment will facilitate the development of an underutilized site within the Built-Area Boundary with a land use, intensity, and form that is appropriate for the site.

Prepared by:	**Alanna Riley, MCIP, RPP** **Senior Planner, Development Services**
Reviewed by:	**Mike Corby, MCIP, RPP** **Manager, Planning Implementation**
Recommended by:	**Heather McNeely, MCIP, RPP** **Acting Director, Planning and Development**
Submitted by:	**Scott Mathers, MPA, P.Eng.** **Deputy City Manager, Planning and Economic Development**

Copy:
Michael Pease, Manager, Site Plans
Ismail Abushehada, Manager, Development Engineering

Appendix A

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 608 Commissioners Road West.

WHEREAS Copia Developments has applied to rezone an area of land located at 608 Commissioners Road West, 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 the lands located at 608 Commissioners Road West, as shown on the attached map comprising part of Key Map No.(A106), from a Residential R1 (R1-9) Zone **TO** a Residential R8 Special Provision (R8-4(_)) Zone.

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

) R8-4(_) 608 Commissioners Road West

b) Regulations

iii)	Height (Maximum)	22.0 metres
iv)	Density (Maximum)	215 Units per hectare (uph)

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.

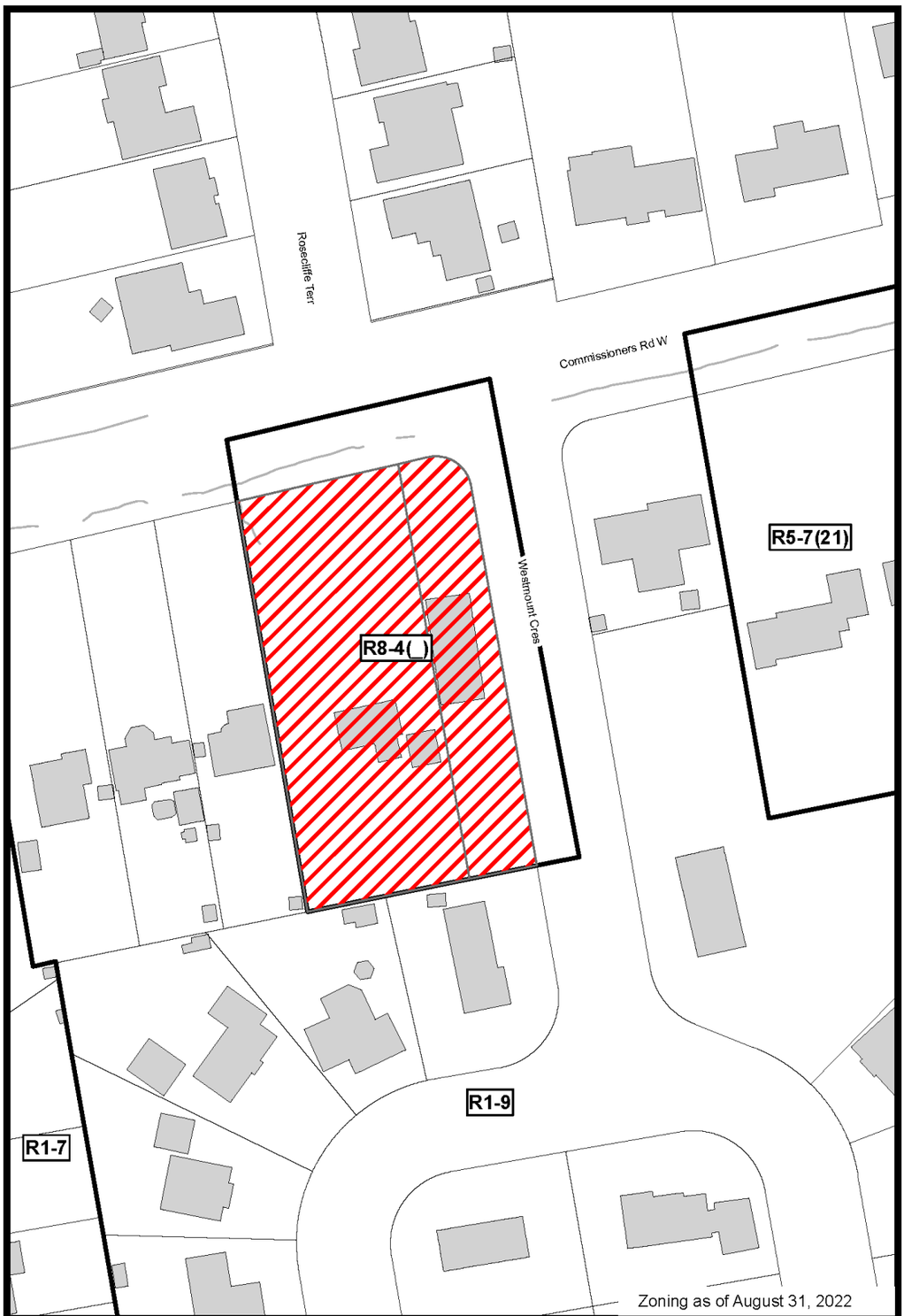
PASSED in Open Council on December 13, 2022.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – December 13, 2022.
Second Reading – December 13, 2022.
Third Reading – December 13, 2022.

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



File Number: Z-9516

Planner: AR

Date Prepared: 2022/10/25

Technician: JI

By-Law No: Z.-1-

SUBJECT SITE

1:1,000

0 5 10 20 30 40 Meters

Geodatabase

Appendix B – Public Engagement

Community Engagement

Notice of Application:

On July 16, 2022, Notice of Application was sent to property owners in the surrounding area. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on July 16 ,2022. A “Planning Application” sign was posted on the site. On October 20, 2022, A Revised Notice of Application was sent to property owners in the surrounding area. A Revised Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on October 20 ,2022.

Responses:

17 replies were received and a petition with 122 signatures

Nature of Liaison:

Original Notice

The purpose and effect of this zoning change is to permit a 6-storey apartment building consisting of 95 residential units at 212 units per hectare. Possible change to Zoning By-law Z.-1 **FROM** a Residential R1 (R1-9) Zone **TO** a Residential R8 Special Provision Bonus (R8-4( )B-( )) Zone. Special provisions would permit a minimum exterior side yard setback 4.5 metre setback whereas 7.0m is required; permit a minimum interior side yard setback of 8.0 metres, whereas 8.4 metres is required; permit a height of 21.0 metres whereas 12.0 metres is required; minimum parking spaces of 98 whereas 129 spaces are required; and a maximum lot coverage of 50% whereas 40% is required. The proposed bonus zone would permit a maximum density of 215 units per hectare in return enhanced urban design and, specifically affordable housing outlined in Section 19.4.4 of the 1989 Official Plan and policies 1638_ to 1655_ of The London Plan.

Revised Notice

The purpose and effect of this zoning change is to permit a 6-storey apartment building with step backs consisting of 95 residential units at 215 units per hectare. Possible change to Zoning By-law Z.-1 **FROM** a Residential R1 (R1-9) Zone **TO** a Residential R8 Special Provision (R8-4(_). Special provisions would permit a height of 21.0 metres whereas 12.0 metres is required; and a maximum density of 215 units per hectare whereas a maximum of 75 units per hectare is permitted.

Letter and Publication in “The Londoner”

Written	Telephone
Nada Turudic	
Blair and Jana Poetschke 579 Jamaica St.	
Paul and Lisa Clarke	
Kim and Rob Styles 644 Cranbrook Road	
Rudy and Brenda de Papp 612 Jamaica St	
David and Karin Peak Westmount Cres	
June & Alan Burrell 659 Westmount Cres	
Darcy Mcleod & Catherine Timmers Mcleod	

661 Westmount Cres.	
Jamie Robertson	
James and Sally Lee	
Amanda, Rob, John and Baby Lyall 60 Nottinghill Cres	
Murray MacKey 625 Jamaica St	
Amanda Moehring	
Gus & Sandy Ayim 596 Rosecliffe Terrace	
Hedy Olowrski	
Robert A. Campbell	
Asha Ramji	
Community Petition – 122 signatures	

From: Nada Turudic
Sent: Friday, June 6, 2022 2:29 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

our neighbourhood met with Paul Van Meerbergen last year regarding 608 commissioners road west. at that time, Kim and her family resided at 591 westmount crescent, which is the property copia developers aggressively purchased from them and finalized the deal at the end of 2021 august.

so we know copia developers owns BOTH the above properties.

my husband and I also met with a representative from copia regarding the surveying stakes they had placed on our property. he mentioned the city has rejected their parking laneway to be positioned directly onto commissioners road west.

the laneway as proposed, would be adjacent to our property which means traffic from the proposed building will be entering and exiting westmount crescent.

so our quiet crescent would become quite cumbersome as well as congested, especially towards commissioners road.

I hope the city sincerely and seriously takes into consideration HOW the above proposal would chaotically alter our quiet neighbourhood, not to the mention the esthetics.

so PLEASE note SOME of the above concerns regarding the above.

From: Blair Poetschke
Sent: Friday, June 27, 2022 7:35 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

I understand there has been a zoning change request filed to change two single family homes into a giant 6-story apartment building and parking deck, emptying into the neighbourhood on Westmount Cres rather than onto Commissioners.

This will certainly be out of place in the neighborhood and will create serious traffic congestion in the neighborhood. Note that the city has put great effort into traffic

calming work in this neighborhood and areas that have been ignored so far will need to be addressed if the building does not exit into Commissioners rd.

The safety of children and adults in this area (where there are no sidewalks) will be at risk from the increased neighborhood traffic.
Please limit the height of this proposed development to ensure the appropriate population density and keep everyone safe from the increased traffic.
Thank you
Blair and Jana Poetschke
576 Jamaica St.

From: Paul Clarke
Sent: Friday, June 27, 2022 8:22 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Good Evening Alanna/Paul
>
> We are in receipt of the Notice of Planning Application for the above address. To say that we have concerns is an understatement. We recently moved to Westmount Crescent (Dec 2021). We moved here in large part for the beautiful mature and quiet neighbourhood. We feel very concerned that the above proposal will greatly increase traffic flow in our neighbourhood. 95 residential units with 129 parking spaces is far too much to be exiting and entering off Westmount Cr. It will come as no surprise that the majority of the vehicles will not continue to Commissioners rd. but rather will “cut” through Westmount Cres. to exit either to wonderland or Viscount rd. Previous developments along Commissioners Road, from the top of “snake hill” to the area in question have been townhouse type condominiums, much lower density and impact on the neighbourhoods effected. I would question why a development of this magnitude and density would even be considered given the fact that no others have been built on similar footprints.
> We have registered for the “virtual open house” that we have been invited to by the developer, I do question why virtual, they are playing the covid card which seems kind of ludicrous considering you can go to a sporting event with thousands of people. But maybe its by design as the majority of residents are quite elderly and probably never heard of zoom.
> Thank you for reaching out to us and giving us a platform to express our important concerns.
> Paul and Lisa Clarke

From: Kim Styles
Sent: Friday, June 27, 2022 9:12 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

I have been a resident of Westmount at 644 Cranbrook Rd for 20 + years.
I am very concerned with the proposed property at 608 Commissioners rd .

Firstly, the property originally housed 2 homes. You have now proposed a 6-storey apt bldg in that footprint. I do not feel this is reasonable to our neighbourhood.

Firstly, I have been made aware that the parking lot will be entering and exiting into the neighbourhood. It is bad enough to have a traffic congestion on Commissioners Rd but it is totally unacceptable for developers to route this excessive amount of traffic throughout our established mostly single family residential area.

I do not feel a 6-storey apt bldg is fair to the established neighbourhood as well. Our properties were purchased years ago, and privacy was paid for at a premium. You are now disregarding our established neighbourhood for monetary gain. I do not support this bldg and especially at 6 stories high. If it is to be built it should be no higher than 4 stories and the parking should be accessed only by Commissioners Rd

How do we contest this lack of utter regard for our privacy, neighbourhood noise and traffic levels as well as our property values?

I am anxious to hear from you asap

Kim and Rob Styles

From: Rudy de Papp
Sent: Friday, June 28, 2022 11:01 AM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Alanna:

My wife Brenda and I are residents in the neighbourhood where this apartment building is being 'Proposed'. Our home has been in the family since being built in 1956 and this has always been a very quiet neighbourhood of mostly elderly residents. This proposal frankly shocked me in that something of this magnitude this would even be considered at all in this area. It is reminiscent of the disaster at 555 Teeple Terrace of recent years.

All of the new 'infill' developments along Commissions road have been low density townhouse style residences which are quite acceptable on Commissioners. I surely hope the city traffic planners and roads committee have approved this seen this problem.

I could envision a complex or 10 or so condominiums there and it would not be a catastrophe at all. This proposed building has 95 apartments all exiting on Westmount Crescent and not Commissioners Road where the units are located, so what's the deal with that? All of these residents will be using the streets in the subdivision and will avoid Commissioners road.

Westmount Crescent is already a short cut for residents in this area and this added traffic burden will most certainly be an issue. Where are the results of the traffic pattern study?

I have been in contact with other long term residents here and the consensus seems to be that a low rise exiting on commissioners road would be more appropriate.

I will be registering for the meeting on July 6th and am concerned that it can not be a meeting at the library or at a church in the area so that elderly residents will be able to attend. Those not either in school of working might know 'Zoom', but not beyond that. Public health allows meetings like this at this stage of what is now an 'Endemic' so please do not avoid an in person meeting, it raises a red flag.

Rudy and Brenda de Papp
612 Jamaica Street,

From: Karin Peak
Sent: Friday, June 28, 2022 12:01 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

My husband and I wish to lodge a complaint in the strongest of terms to the proposed development of a 6-storey apartment building at 608 Commissioners Road West.

The area where this building is intended is a quiet residential area. This development will bring unneeded and unwanted traffic and noise to an area that prides itself as a quiet haven for those of us who desire the solitude of a quiet lifestyle whilst being close

to the hustle and bustle of the city. We believe it will also have an adverse effect on home pricing and our ability to sell in the future.

This development will not be an improvement to the area or the lives of the current residents.

We implore you to cease any further planning on this project

Sincerely

David & Karin Peak
Westmount Crescent

From: Rudy de Papp
Sent: Friday, June 29, 2022 12:03 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Alanna:

There is a perfect compromise on the 'traffic problem' being proposed. If the city were to turn Westmount Crescent into a 'Dead End' street, then all traffic would have to exit onto Commissioners Road which abolishes the traffic issue in our quiet and calmed neighbourhood. Residents of Westmount Crescent and Jamaica Street would still be left with three ways to exit the subdivision. I have seen this done before in similar infill situations. This 'Barrier' would be placed between the proposed driveway for the new building and the adjacent residential property immediately to the south. Placing the barrier there would keep the residence south of the proposed complex within the existing residential area.

I find it difficult finding a negative impact of such a dead-end barrier. Also, this barrier should have sufficient opening to allow for pedestrian and bicycle traffic.

Rudy and Brenda de Papp
612 Jamaica Street

From: Alan Burrelll
Sent: Friday, July 4, 2022 8:22 AM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Alanna:

Thank you for returning our call. As mentioned, we are following up on our conversation by putting our concerns in writing in case we missed anything. This is a pretty big deal for us!.

We object in the strongest possible terms to the proposed development for the addresses listed above. This proposed development is too large, totally inappropriate for this neighbourhood and will destroy the character, peace and tranquility of this area that we have enjoyed for the past 26 years.

We have many concerns
- The first is the value of our property.
Over the past 26 years, we have spent a lot of time, money and effort to add to, maintain and beautify our property and we take great pride in our home and garden, as do all of our neighbours. All the properties on Westmount Crescent have been improved, and two smaller houses have even been demolished and replaced with newer homes. This area is often referred to as a "hidden gem" - no more if this development goes ahead. The entire neighbourhood is well maintained, and people take a lot of pride in their properties. This development will devalue our property.

The size of this project is totally inappropriate for this site. It will create a tremendous amount of traffic on our quiet street and since the number of intended parking spots is below what is normally required (with only 3 spots for visitors), there will inevitably be on-street parking. With the front of the building facing onto Westmount Crescent, and deliveries, garbage pick-up etc. to be done in a "lay-by" in front of the building on Westmount Crescent, there are going to be vehicles either swinging around to exit back onto Commissioners or alternatively driving through the neighbourhood. This action should all be taking place on the arterial road and not on a neighbourhood street. Many people walk, jog and cycle in our neighbourhood and with this development as proposed, this activity will become extremely dangerous with increased traffic and parked cars. There are no sidewalks on Westmount Crescent. With the present amount of traffic on Commissioners Road, it is already difficult to even turn right onto Commissioners not to mention turning left. The number of vehicles attached to the proposed apartment building will create great traffic problems in the neighbourhood, not to mention noise and pollution. Our neighbourhood is already "traffic-calmed" and we still have cars cutting through.

It seems to us that the fact that the developer is asking for so many special extensions of the conditions related to the zoning change is an indication that the development as proposed is a huge over-reach for the site. They are asking for:
- less parking spots than are normally required (and providing only 3 visitor spots for 95 units)
- increased height of the building (21 metres instead of 12 metres!)
- increased density
- increased lot coverage (50% instead of 40%)
- a reduction inside yard setback

The two-storey parking planned at the back of the development behind our back fence is a concern from the point of view of noise, pollution and loss of privacy. We spend a lot of time in our backyard. This is also another indication that the proposed development is too large for the site. There are many mature evergreen trees around the perimeter of the property, some estimated to be 40-60 feet tall. We would like to see as many as possible of these trees preserved, especially the ones on the south side.

The driveway on and off the property would enter and exit on to Westmount Crescent, directly beside our neighbour's driveway. The driveway should be off Commissioners Road and not impact the neighbourhood street. This area of Commissioners could benefit from an oval roundabout taking in Westmount Crescent, Rosecliffe Terrace and the driveway from 608 Commissioners. This would be safer since any traffic exiting any of those roadways would be going in the same direction around the roundabout and would keep traffic moving.

Other considerations would be the over-taxing of the local sewers and water supply for such a large development. Also, the fact that the site is going to be mostly hard surface has the possibility of flooding in the area.

We see mentioned in the planning material something about having "a choice of type of accommodation" in the neighbourhood. You only have to go one block to Wonderland Road to be provided with many choices of high-rise and low-rise apartments, along with townhouses that are just about to be built east of the subject property at 584 Commissioners Road, and these accommodations have even closer access to services such as transportation, retail etc. So, there is already ample choice in the area - no need for an apartment building at this particular site.

We realize with the bonusing condition, that the city would be provided with 3 or 4 affordable housing units if this building goes ahead as planned. We think the problems outweigh the benefits in this situation.

To sum up, in our opinion, the development as planned is excessive and will create many problems for our neighbourhood. If you look to the west along Commissioners Road, there are several developments of one or two storey condos which, while being multi-family, fit nicely into the character of the neighbourhood. The developers of these properties had a good read of the neighbourhood and these developments blend in nicely. We understand that there has to be "intensification" and that anything built on the site will be some type of multi-family development. However, in the London Plan it states, "as directed by the policies of this Plan, intensification will be promoted in appropriate locations and in a way that is sensitive to existing neighbourhoods and represents a good fit". In our opinion, this development is not sensitive to our neighbourhood and does not represent a good fit - it is far too large and will create too many problems for many long-time residents in this neighbourhood. We would prefer to see something of not more than one, two or three storeys on the site.

Sincerely,

June & Alan Burrell
659 Westmount Crescent

From: Darcy Mcleod
Sent: Friday, July 5, 2022 12:32 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Re proposed Development of 608 Commissioners Road West.
File : Z-9516

Alanna Riley and London planning & development committee:

As a resident of 661 Westmount Cres. We strongly oppose this development for a number of reasons.

1. The height of the proposed building at 6 Storeys does not fit with the size or scope of any of the buildings in the Neighborhood encompassed by south side Commissioners Road, west side of Wonderland Road, north side of Viscount Road, and east side of Cranbrook Road.
2. The amount of added traffic to Westmount Cres. As the proposed buildings parking lot empties out onto Westmount Cres. Rather than an arterial road like Commissioners Road.
3. The proposed building has an amendment for less parking spots then are needed for a building of this size. This will cause the amount of street parking to increase dramatically.
4. The proposed building only has 3 visitor parking spots for 95 units which will also increase parking on our traffic calm neighborhood.

Westmount Cres. Has been designated a traffic calm Neighborhood by the city of London and the London plan states that all new Construction has to fit in with existing Neighborhood which this proposed development does not.

Darcy Mcleod & Catherine Timmers Mcleod
661 Westmount Cres.

From: Jamie Robertson
Sent: Friday, July 10, 2022 8:24 AM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Dear Alanna,

In response to the recent notice received, for the above zoning by-law amendment. Both my wife and I have lived in this city for the last 60 years, and myself, having lived in Westmount for the last 50 years. Like most, worked hard to raise a family, and create a nice home with a certain amount of privacy. Our first reaction when receiving the

notice, was total rejection because it was new, and not understood. Being recently retired, allowed us to put a little more thought into the proposed amendment, because we believe in the process.

While reading the additional material online, we noticed that the two studies that are of concern, traffic volumes and noise study, were done in September and October of 2021. How can two studies that would negatively affect any sanctities in a residential area, be completed at the height of a pandemic, in which a great deal of Londoners worked from home. As a planner, your aware of the absolute nightmare we all face with the current traffic in London, especially with Wonderland Road. Being one block in, we can't thank the city enough for now allowing the construction of 6 lanes to be completed, and Wonderland turning into the 401B through the neighborhood. Quietly allowing it to be the new Hwy 4 is bad enough. However, we continue to allow additional projects that will impact an already congested area.

Building a left turn from Westmount Cres to East bound Commissioners. Has anybody in planning tried to make a left onto Commissioners? From experience, it's not easy, and most with cut through the neighbourhood and use the light at Cranbook, causing additional traffic volumes and noise. Traffic calming measure to seem to work. Southbound traffic will not exit Westmount Cres on to Commissioners to Wonderland, and then proceed South. They will proceed through to Jamaica Street to Village Green, and then South on Wonderland. It's done now from East bound traffic trying to avoid Wonderland intersection at Commissioners.

6 floors. This will allow residents to look into the back yards of single family homes on a 360 degree bases of the building. I'm sure that one may say that residents probably have better things to attend to, but the possibility is still there, and the privacy is lost for the homes around the building, not to mention the loss in value. The amended land use further West on Commissioners, were multi single story row homes were built, is a welcome site, and fits well with the surrounding homes. I thought the city should propose with 608 Commissioners.

Thank you.

Best Regards
Jamie Robertson

From: James Lee
Sent: Friday, July 11, 2022 3:13 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

In response to the application by 608 Commissioners Inc., this is to advise that we are strongly opposed.

- As we understand, this is an amalgamation of two properties in order to build an apartment of significant size. The applicant states it will retain trees; however many trees and shrubs were already removed along the eastern property line between these two lots, thereby strong-arming the previous owners of 591 Westmount Crescent into selling. Since acquiring ownership, the owner has done absolutely nothing at either property. Both are a disgrace. The applicant states that high-quality materials will be used in construction and seems more worried about placating the public speeding along Commissioners Road than getting into the good graces of the neighbourhood.
  -
- After the ‘Virtual Open House’ it is clear that even though the address and description might be 608 Commissioners (because Commissioners is considered a ‘civic boulevard’), the main entrance and parking entrance will be on Westmount Crescent, a traffic calmed street without sidewalks. The Crescent and neighbourhood are not equipped to handle all the additional traffic and a traffic study of the entire area would back that up. Vehicles also use the Crescent

to short cut the congestion and wait at Commissioners turning south onto Wonderland.

- There has just been a townhome complex approved on Commissioners to the east and between these two developments, traffic will become a problem. Drivers race west through Commissioners at Wonderland, a very busy intersection, to get into a single lane and if this current application is approved, multiple vehicles will be making two left turns, one right after the other.
- The house across the street on Westmount is a group home. As the driveway is not big, staff park on the Crescent, on both sides, 24/7.
- The Application Details state that this neighbourhood is in an area that permits “single and semi-detached dwellings, duplexes, triplexes and townhouses”. Why then is this application for a 95-unit apartment building even being considered?
- The Crescent is used most weekdays by slower moving maintenance vehicles. Countless people enjoy a walk and bike ride through the neighbourhood.
- The proposed building is too big and too tall. There is nothing west of Wonderland on Commissioners even approaching this height. Providing parking for three visitors means constant overflow parking on the Crescent. The building will look into the yards of private homes, including across Commissioners into Rosecliffe. The loss of mature trees and hedges, combined with all of the parking, will increase noise. The lighting from the parking lot will be a nuisance. Property values will decline significantly.
- City records will show that an application brought a number of years ago by a former owner of the Westmount Crescent property to operate a pharmacy was denied. This development dwarfs that proposal - a pharmacy that was to be operated from a single storey building.
- This is a quiet, traffic-calmed neighbourhood of single-family homes and to quote Councillor Van Meerbergen, this “is not a case of NIMBY”, this development does “not fit into this neighbourhood”, nor will it result in a “healthy, liveable and safe” neighbourhood.

Regardless of long-term plans, the owner should be showing more consideration for the neighbours by ensuring proper care and maintenance of both properties.
James & Sally Lee

From: Amanda Lyall
Sent: Friday, July 13, 2022 2:20 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Hi Alanna
Please find attached my letter of concern in regard to the Planning Application for 608 Commissioners Road West.
I look forward to any feedback you can provide.
Regards,
Murray

Murray Mackey
FORMET INDUSTRIES

Alanna Riley
ariley@london.ca
Planning & Development, City of London
300 Dufferin Avenue, 6th Floor
PO Box 5035
London ON N6A 4L9
File: Z-9516

July 13/22

Alanna,

I wish to submit the following comments and concerns in regards to **File: Z-9516** (608 Commissioners Road West):

- The proposed structure is too big for a property on which it is to be built
- A 6-storey apartment is not suited for the neighbourhood
- The apartment is an extremely high density for the area
- There is not adequate setbacks to the adjacent properties
- There is inadequate parking, specifically 98 spots for 95 units
- Parking for both residents and guests will inevitably flow over to the nearby streets
- Traffic will increase significantly through Westmount Drive, Jamaica Street and Village Green

I am a resident in the area, living at 625 Jamaica Street and as such would be directly impacted by the points listed above. I am available at your convenience to discuss this matter, and can be reached at [redacted]

I await notification of the next steps in this application process.

Sincerely,

Murray Mackey
625 Jamaica Street
London, Ontario
N6K 4L6

From: Amanda Lyall
Sent: Friday, July 15, 2022 4:20 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Dear Ms. Riley;
Re: File Z-9516; Applicant - Copia Developments
I am writing as a concerned homeowner with regard to the proposed zoning amendment relating to 608 Commissioners Rd. W, London, ON.
I would like to firstly provide you with a bit of background on myself and my family and how we came to reside in our lovely neighbourhood. My husband and I purchased our home, located at 60 Nottinghill Cres., approximately 4 years ago. We searched for this home for over 6 months. It is our dream home, in our dream neighbourhood. When we were house shopping, we specifically were looking at older, established neighbourhood for the large trees, good sized yards and quiet streets. When we came to look at this house, the neighbours were playing a game of road hockey. I loved this and immediately could envision myself raising a family here. The plan was for this to be our forever home. This neighbourhood checked all the boxes, and we were ecstatic when we learned we had gotten it! Since then, we have had our son, John. We are expecting a baby girl set to arrive in August of this year. We are an active family who go for walks,

bike rides, “wagon walks”, etc. almost everyday. We love feeling safe on our street with minimal traffic. We love the large, mature trees and how quiet the neighbourhood is, not to mention the wonderful people who live here.
We were not initially made aware of the proposed zoning change as we live outside of the 120 m radius. However, it was brought to my attention, when on a walk, a neighbour mentioned it to me. I brought the paperwork home and was astounded to see the numerous, egregious Special Provisions being sought by Copia Developments. Firstly, I note that they are requesting zoning to go from strictly a single, residential dwelling to a large-scale apartment building, that in my view, is not conducive to our neighbourhood. Not only that, but they are requesting to go even bigger – asking for permission to nearly *double* the maximum height of the building, to nearly *triple* the maximum density of units, increase the number of permitted parking spaces, to reduce the setbacks in almost every aspect and to increase the maximum lot coverage. One major thing that jumped out at me was their omission on landscaping, where a 30% minimum is required. Based on their other requests, I would anticipate Copia Developments to be requesting to reduce the minimum landscaping requirements as well. If this is the case, this request would be in direct opposition to the *Provincial Policy Statement, 2020* which advises that new developments maximize vegetation – we live in the “Forest City” afterall. **All of the above lead me to believe that Copia Developments is looking to maximize their profit at the expense of my neighbourhood.**
I am concerned with the increase in vehicular traffic that this development will certainly create. Particularly with their proposal to have the entrance to this monstrosity off a residential street. I am also concerned with the noise pollution that will be created, not only during the construction phase, should this be approved, but also afterward with the increase of, presumably, hundreds of cars now entering our safe, quiet neighbourhood.
Of note, the *Provincial Policy Statement, 2020*, states:

“Land use must be carefully managed to accommodate *appropriate* development to meet the full range of current and future needs, while achieving efficient development patterns and avoiding significant or sensitive resources and areas which may pose a risk to public health and safety.”

It is my respectful submission, that this development does not align with this goal of the Statement, in spite of it addressing housing needs in the City. I submit that this location is simply not appropriate for an apartment building of this magnitude. With the numerous requests of variances and re-zoning, another location would be more suitable for this building, otherwise, such requests would not be required.
Please keep my family and our neighbourhood in mind and reject his proposal.
If you have any questions or concerns, please do not hesitate to contact me directly.

Thank you for your time.

Yours truly,

Amanda, Rob, John and Baby Lyall

From: Amanda Moehring
Sent: Friday, July 15, 2022 5:45 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Dear Ms. Riley,
I am writing to express my concerns with the zoning amendment and development proposed for 608 Commissioners Rd W. While I am in favour of increased housing density, these shifts need to be done thoughtfully and with consideration for their impact on existing neghbourhoods.

My primary concerns are:
1. The development is too tall. Six stories will eliminate the privacy of all of the properties within a one-block radius. The development should not be taller than four stories. Further, the added traffic this size of building will create causes serious issues

(see below). Ideally, to fit the tone of the other developments in the vicinity and the capacity of the roadways, the development should be townhomes
2. The entrance/exit is in a highly detrimental location. The location of the entry/exit should *not* be into the neighbourhood, which is not set up to accommodate that level of increased traffic. This issue is compounded since our neighbourhood does not have sidewalks but has a thriving pedestrian environment, creating a serious safety issue. The entrance/exit should be onto Commissioners, which is a high traffic road capable of handling the added load.
3. There should not be a two-story parking deck backing onto existing properties. This will remove privacy, greatly damage their property value, and has a high potential to cause water runoff issues.
4. The parking is insufficient for the size of the building (another reason to make it fewer stories). This will generate a large number of parked cars on the street.
5. Developments should include green space. The existing properties are currently almost entirely green space. The proposed plan appears to replace those lots with solid concrete - the building and the parking deck. This creates problems for runoff, aesthetics, and biodiversity.

Thank you for considering my concerns.

Sincerely,
Amanda

****
Dr. Amanda J. Moehring

From: Sandy Ayim
Sent: Friday, July 24, 2022 5:07 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Dear Alanna and dear Paul,

We received information about a zoning by-law amendment that we, along with numerous neighbours, are strongly **opposed to** at 608 Commissioners Rd W.

Our neighbourhood is a quiet residential one and this big 6 story building will add much unwanted
noise and congestion in our area. Furthermore, the height of a 6-story building invades into
the privacy of numerous homeowners in the area. Also, it would be a huge detriment to our Forest City to lose any of the healthy mature coniferous trees on those properties.

We look forward to further opportunities to express our utmost concern over this development at future meetings, which in the letter we received, we will be informed about once scheduled.

Sincerely,
Gus & Sandy Ayim
596 Rosecliffe Terrace

From: Simon Thuss
Sent: Wednesday, October 26, 2022 10:26 AM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Good morning Alanna,
I am writing this morning to express support for planning applications Z-9553 and Z-9516. I am a resident in the Westmount community and I support increased density

along the major corridors in our neighbourhood (e.g. Commissioners, Wonderland and Southdale).
Our city desperately needs more housing, and we can't simply continue building out. Some infill development must continue along our major transportation routes. I think increased density in this area will also help revive commercial properties in the area, such as Westmount mall, which will benefit the overall community.

I am aware that others in the community have concerns about traffic. However, these proposed developments are well placed with access to Commissioners Road. I am aware of other nearby neighbourhoods that have a much higher density and traffic doesn't seem to be an issue (e.g. I used to live on Baseline Road, west of Wharncliffe. Density in that neighbourhood is much greater than what is proposed here, without direct access to a major road).

I wish to be notified of any developments or public meetings associated with these applications.
Thank you.

From: Jamie Robertson
Sent: Wednesday, October 26, 2022 11:51 AM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Alanna,

In my previous email, I listed several reasons this re-zoning of 608 Commissioners and the adjacent property on Westmount Cres should not be approved. As Paul mentioned in his re-election statements of accomplishments, you can't put a 6 story building as infill in a residential subdivision. A subdivision dominated by single story homes in which most are seniors. Now you have an additional application for re-zoning across the road at 614 Westmount Cres (Z-9553) of 43 units. Not to mention 584 Commissioners road that backs on to 614 Westmount Cres application for townhomes.

With most of the properties owned by seniors in this area, with lots being twice the size of a standard lot, would it be safe to say, that if sold to the developers that the city of London cow tails to, this area could become the next Cherry hill? Yes, this is cynical of me, but I've lived in Westmount since 1971, and believe in the community, and how it was originally planned. West on Commissioners, the city approved two developments from properties that were re-zoned from single family. Both those properties are single story dwellings, that fit into the original plan of Westmount. The properties mentioned above, should be approved and built in a similar fashion as those. In my opinion.

Best Regards
Jamie Robertson

From: Alan Burrell
Sent: Monday, October 31, 2022 9:01 AM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

We are writing in response to a "revised" application on the above project.

First of all, it is our belief, and that of the 122 plus community members in this neighbourhood who have signed a petition against this project, that this apartment building is <u>still</u> a gross over-reach for this site and is not appropriate, nor does it fit with the neighbourhood, under the requirements of The London Plan.

It is difficult to see what the revisions to this application are - they're not outlined anywhere in the revised document but it looks as if there could be underground parking

(we see a "ramp down" label on the diagram). We're not informed of how many parking spots are now proposed for the site.

We still object to this building in the strongest possible terms. It is still six storeys, still twice the allowable height, and three times the allowable density - 215 units per hectare where 75 is permitted. The special provision related to lot coverage has been dropped from the special zoning provisions. Comparing the original and revised site concept diagrams (which by the way are very difficult to read), it would appear that the building extends much further south on the revised version so this would seem to cover even more than the 50% of the site on the original diagram, where 40% is the maximum allowable.

Apart from the size of this building, the other issue which is a detriment to our neighbourhood, is the fact that the driveway enters and exits onto Westmount Crescent, a neighbourhood street in a traffic-calmed neighbourhood. With 95 units, there is the potential for 130 vehicles entering and exiting, and related delivery and service vehicles driving through the neighbourhood. This will create enormous traffic problems and the nature of our street will change forever. (This is without considering the other proposed development at 614 Westmount Crescent, directly across from the proposed apartment building, with the potential for another 40 vehicles plus servicing vehicles, using Westmount Crescent.) Anything built on the 608 site should be exiting onto Commissioners Road and not the side street and there should be room on the site for deliveries etc. Because the building is so oversized for the site, there isn't room for this. Traffic studies have been done on Commissioners and state that Commissioners can support increased traffic, but no studies have been done on Westmount Crescent where most of the traffic will go. Westmount Crescent will become a major road.

In the traffic report online, it states that there should be a left turn lane from Westmount Crescent at least 25 metres long - about 6 cars. People are not going to wait in that turn lane, they will drive through the traffic-calmed neighbourhood - Westmount Crescent and Jamaica Street or Nottinghill Crescent, onto Village Green and perhaps on to Woodcrest.

Deliveries etc. are proposed to be made in a lay-by at the front of the building (on Westmount Crescent). Once their business is done, they will also drive through the neighbourhood (or do a U-turn on Westmount Crescent which is dangerous in itself). All this activity should occur on the site, entering and exiting onto Commissioners Road.

In both the original application and the revision, it states "The subject lands are in the Neighbourhood Place Type on a Neighbourhood Connector in The London Plan, permitting single and semi-detached dwellings, duplexes, triplexes and townhouses." There's a reason that this is the designation for this site, because the townhouse form of housing is the only multi-unit form that would be acceptable in the middle of a single family residential neighbourhood. That is the form of housing selected by the developers of the other three projects planned within our area. A six-storey apartment building is not appropriate for this site and does not fit with the neighbourhood. This requirement for approving intensification projects is in The London Plan.

The Westmount Crescent neighbourhood has existed for about 75 years. Our house was built in the 40's. Residents have bought houses and spent money on renovating their properties in the neighbourhood in order to live in a quiet residential area. If this apartment building goes ahead, it will change our street from a quiet neighbourhood to busy, loud and dangerous, resulting in reduced home values. Is it fair that a developer can come into an existing neighbourhood and upend it? We've already had one family driven from their home of 20 years. Our neighbours have been dutifully abiding by the rules and paying their taxes all this time only to have this six-storey building foisted on us. These apartments will not be affordable, which is the kind of housing London so badly needs.

The province cancelled its bonusing policy in September but this building is still six storeys when four storeys is the maximum allowable. The "B" is gone from the new requested zoning, however the building is still six storeys and for that, the city will get "enhanced building design" and 10% of the units on the extra two floors (which we calculate to be 3 or 4 units) at 80% of market value, which we do not believe is affordable anyway. Going from 4 floors to 6 floors is **huge** whereas going from, say, 12 floors to 14 or 20 floors to 22 really doesn't make much difference. We don't see any important benefit to extending the height of this building by two extra storeys. If the townhouse form of housing or at worst a four-storey building is not financially feasible for this developer and/or their investors, then perhaps they should leave the site to be developed by someone else. There are several empty sites, like the large site of the former Brick Street School, that would be more appropriate for an apartment building in the area.

London may be in need of housing but it's not essential in this area as we have a very large choice of different types of housing just a block away on Wonderland Road or on Village Green Avenue. Also, there are many apartment towers of luxury apartments either newly constructed or under construction in this area. London is more in need of affordable housing and the city has to work to maximize the use of provincial and federal programs to create this. Alternatively, the city should partner with a developer who is willing to work with the city to create this type of housing. Whatever happened to "starter homes"? Today we either have luxury apartments or luxury townhouses or huge single family houses, out of the reach of many families.

We have spoken to our councillor, Paul Van Meerbergen, and his opinion is that this building is just too large for the site.

We collected signatures on a petition against this six-storey building and that still stands. Nobody in this neighbourhood is okay with this development. It's gross overdevelopment and should never have even been considered by the city.

Respectfully submitted,

Alan & June Burrell
659 Westmount Crescent
(directly behind 608 Commissioners)

From: Amanda Lyall
Sent: Wednesday, November 2, 2022 9:06 AM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Good Morning Ms. Riley and Mr. Van Meerbergen,

I hope this email finds you well.

I am writing as a follow up to my previous letter wherein I expressed concerns with regard to the planning application for 608 Commissioners Rd.

I am again writing to address my concerns with regard to the amended application.

I am of the view that the crux of this issue is still the request to rezone from single family To multi residential. It appears to me as though Zelinka Priamo Ltd. c/o Copia Developments asked for numerous additional variation requests, all the while knowing that when they fixed those up, it would appear that many concessions were made. However, the crux of this issue is primarily the re-zoning and secondly the size of the building (density and height requests) and the entry into Westmount Cres. These requests are still being sought. I am wholeheartedly against these requests and this building for the reasons stated in my previous letter.

I am sure you both know that there are two other planning applications in the same vicinity of Commissioners Rd. as well as the recently announced plan to build up if Westmount Mall (Which I think is a great use of the area). Builders have been purchasing homes in my neighborhood and leaving them boarded up and unkempt, when families could have been moving in. When will they stop buying up these lovely homes and taking over?

The totality of all these projects (should they all be approved) makes me fear that there will be a concrete jungle where the beautiful tree lined streets of my lovely neighbour hood used to be.

This is my forever home. We just had our second baby in August. I want her and her brother to grow up in our quiet, safe neighbourhood. I urge you to deny this request to rezone and to deny the requests of Zelinka Priamo Ltd. and Copia Developments.

Please do not hesitate to contact me directly with any questions or concerns.

Thank you

Sincerely,

Amanda Lyall

From: Hedy Orlowski
Sent: Wednesday, November 2, 2022 12:25 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

I am writing this email in regard to the above-noted Planning Application.

I am NOT in favour of this application being approved in any way, shape, or form. This apartment building will be a detriment to our neighbourhood, not an improvement. There will most definitely be an increase in traffic, causing concern for both our seniors and children, and our house values will decrease as a result of this going forward.

Again, I am not in favour of amending this zoning by-law.

Thank you

Hedy Orlowski
669 Westmount Cres.

From: Amanda Moehring
Sent: Wednesday, November 2, 2022 1:32 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Dear Ms. Riley,
I am writing to express my concerns with the zoning amendment and development proposed for 608 Commissioners Rd W. While I am in favour of increased housing density, these shifts need to be done thoughtfully and with consideration for their impact on existing neghbourhoods.

My primary concerns are:
1. The development is too tall. Six stories will eliminate the privacy of all of the properties within a one-block radius. The development should not be taller than four stories (maximum, ideally three stories). Further, the added traffic this size of building will create causes serious issues (see below). Ideally, to fit the tone of the other developments in the vicinity and the capacity of the roadways, the development should be townhomes

2. The entrance/exit is in an unacceptable location, exiting directly into our small, quiet neighbourhood. It will ruin the safety and family-friendly environment. The location of the entry/exit should *not* be into the neighbourhood, which is not set up to accommodate that level of increased traffic. This issue is compounded since our neighbourhood does not have sidewalks but has a thriving pedestrian environment, creating a serious safety issue. The entrance/exit should be onto Commissioners, which is a high traffic road capable of handling the added load.
3. The parking is insufficient for the size of the building (another reason to make it fewer stories). This will generate a large number of parked cars on the street. This will compound the negative effect on the safety of the neighbourhood as pedestrians will be forced to walk further into the road.
4. Developments should include green space. The existing properties are currently almost entirely green space. The proposed plan appears to replace those lots with solid concrete - the building and the parking lot. This creates problems for runoff, aesthetics, and biodiversity.

Thank you for taking the time to seriously consider my concerns.

Sincerely,
Amanda

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Dr. Amanda J. Moehring
Professor
Department of Biology
Western University

From: Murray MacKey
Sent: Wednesday, November 2, 2022 2:44 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Hi Alanna

Further to the letter of concern sent on July 13, 2022, I understand there is a Revised Notice of Planning Application, File: Z-9516, which asks for comments by November 9, 2022.

I have reviewed this revised notice, and have concluded that the revisions are minor at best. Hence, in conclusion, my concerns stated on July 13 remain today despite the minor revisions.

I continue to be available to discuss at your convenience.
Sincerely,
Murray

Murray Mackey
FORMET INDUSTRIES

From: Robert Campbell
Sent: Sunday, November 6, 2022 5:24 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

Ms. Riley,

Councillor Paul Van Meerbergen summed up concerns about this project when he said, “It is just too big.” If you look at aerial views of the project and its surrounding, it does

not blend in but rather sticks out like a sore thumb, e.g., Fig 21, page 20 in Planning and Design Report.

The Planning and Design Report is glib. It is full of feel-good, in-vogue jargon which attempts to engender acceptability but has, in fact, no relevance to the proposal. Some examples. .

"The proposed development (6 ST apartment building) is generally considered to be compatible with low-density residential uses". Generally considered by whom? One certainly would not get that impression based on resident feedback at the Nov 2 Zoom session.

"The proposed apartment building has a mid-rise (6 ST) form and will not contribute to the "overwhelming effect of large high-rise developments". That might be true in an area of mixed height buildings but in an area currently composed solely of single family detached homes, a six story building is overwhelming.

"The proposed parking provision (1 space per unit plus 3 visitor spaces) is sufficient to accommodate resident needs". The Canadian average is 1.5 vehicles per household. London has 163,000 households and 273,00 cars which works out to 1.7 cars per household. I expect that Zelinka Priamo will feign surprise when 50 vehicles owned by the apartment residents are parked on the street, But by then it will be too late to avoid a major problem. Let's play "Fun with Numbers". The northern section of Westmount Cres is 497 ft in length (measured on Google Maps). If you count both sides of the street, there is 994 feet of curb. You can't park within 9 m (30 ft) of an intersection so thar reduces the available curb space for parking by 120 feet to 874 feet. There will be an amount of curb unavailable because of driveways and entrances (amount unknown at this time). The average space required for a car parking space is 16 feet in length by 8 feet inn width. 50 cars at 16 feet per car will require 800 feet of curb – the entire north section of Westmount Cres on both sides of the road. The road is only 26 feet in width so if cars park on both sides, the street will become single lane, If parking is only permitted on one side of the street, half of the cars will have to park on the southern arms of Westmount. This would mean cars parked on the west arm to about #669 and on the east arm to about #652. Will this be disruptive? Definitely..

"The proposed development provides a high degree of design that will urbanize adjacent streetscapes and contribute positively to the existing neighbourhood;" The proposed project will not "urbanize adjacent streetscapes" except to the extent that having the street completely lined by parked cars will be reminiscent of downtown streets. How will the project "contribute positively to the existing neighborhood"? .

The shadow study is misleading. Why 10 AM and 3 PM? Simple – the shortest shadows are near midday. If one wants to have a garden, sit out in the morning for coffee, sit out for dinner, or just have natural light in the house, then times earlier and later are relevant. Figure 30 in the Planning & Design Report creates the impression that adjacent properties are not shadowed on June 21. However if you compute the shadow length & direction for times other than 10 AM and 3 PM, you find (Calculations derived from data generated by the U.S. Naval Observatory online app).
8 AM Shadow almost completely covers house and yard of first property west of project
9 AM Shadow covers yard to east of first property west of project
5 PM Shadow covers most of yard west of 590 Westmount(east of the project)
6 PM Shadow covers yard to west and south of 590 Westmount
7PM Shadow covers east yard of 590 Westmount, part of north yard and all of south yard of 584 Westmount
Shadow impacts also occur at the other times of the year.

Transportation Impact Assessment. I have lived on Westmount Cres for 16 years. My experience is that one almost always has to wait to make a left turn from

Commissioners onto Westmount Cres. During rush hour, the wait can be significant. I don't know how the consultant came up with the numbers 50 and 42 for peak hour trips. However, presumably his starting point was 95 units with one car per unit. In fact, one has to consider the proposed development on the east side of Westmount (20 units). Then if all 115 units have 1.5 vehicles, the calculations should be made with a starting point of 173 vehicles. As others have pointed out, if apartment dwellers are approaching home from the east, they won't stack up and wait to make a left turn onto Westmount. Instead, they will get on Wonderland, turn onto Village Green, then Jamaica and the south end of Westmount. Traffic lights at Wonderland & Commissioners and at Wonderland & Village Green will facilitate left turns at those intersections. The result will be heavy traffic on the southern section of Westmount.

As I understand it, the London Plan, if implemented, would restrict building height to 12 m in this area. Presumably that was a considered decision. It can't be argued that construction of buildings less than 21 m in height isn't economically feasible. There are two townhouse projects proposed for the immediate vicinity. Presumably, those developers consider them to be economically viable. There should be a better rationale for increasing the limit to 21 m for one developer other than that the project will be more profitable to the developer than a 12 m building, If the city does approve this variance, it will be hard put to deny any other developer any height restriction variance requested anywhere in the city. Zelinka Priamo is applying the thin edge of the wedge towards unrestricted construction height.

Robert A. Campbell
675 Westmount Cres

From: James Lee
Sent: Wednesday, November 7, 2022 11:02 AM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] File Z-9516

November 7, 2022
Ms. Riley:
RE: Application Z-9516 – 608 Commissioners Inc.

In response to the revised application by 608 Commissioners Inc., we continue to be strongly opposed to this project.
We listened to the second Virtual Open House on November 2, 2022 and apparently, the developer and the planner did not hear the neighbourhood after the first go-round. Did the City?

The proposed building is still too big and too tall. Despite lowering the height of the two ends, this is still a monstrosity that will loom over the entire neighbourhood. The developer is taking advantage of the fact that the smallest portion of the building will run along Commissioners, thereby allowing it to propose a 6 story-95 unit building. It is deceptive and, we don't believe, what the City intended with its new plan. Neither pedestrian nor vehicular traffic will access the building off Commissioners. It will all be off Westmount Crescent. There is a sign along the boulevard of 591 Westmount Crescent that the City erected a long time ago advising that this is a traffic-calmed neighbourhood.

Parking continues to be a problem. Allowing 0.5 vehicles per unit is absolutely ridiculous. Moving the bulk of the parking underground is positive, however the majority of residents won't be taking public transit or riding bicycles, despite what the City might hope. And the change to provide more greenspace for the occupants does nothing for the rest of the neighbourhood. It still means more noise, more street parking, lack of privacy, loss of green cover and decline in property values.

Traffic will increase considerably and despite traffic studies, you would be surprised how many people avoid wait times onto Commissioners and at the Commissioners/Wonderland corner by cutting through via the Crescent.

We would like the City to ensure that the impact of all four developments proposed within two blocks of our quiet Crescent be considered as a whole and not individually. This is a horror show and has become very distressing for property owners.

James & Sally Lee

From: Asha Ramji
Sent: Wednesday, November 9, 2022 5:07 PM
To: Riley, Alanna <ariley@london.ca>
Subject: [EXTERNAL] 608 Commissioners Rd. W. Feedback

Hello Ms. Riley,

I hope you're doing well!

I'm emailing you today because I have attached a PDF letter to this email sharing my feedback (and the feedback of others) regarding the proposed zoning change to allow for a new apartment building at 608 Commissioners Rd. W. I've also CC'd our Ward councillor Mr. Van Meerbergen so you are both aware of how the residents are currently feeling. I know the deadline for feedback is today so I apologize for sending this so last minute, but it took a great deal of time to read through the planning documents and properly draft my thoughts.

As noted in the letter, please let me know if there's any other information or feedback I can provide. I'd appreciate it if you could confirm that you received this email as well.

Thank you very much, and have a great day!
Sincerely,

Asha Ramji

Dear Ms. Riley,

I am writing to you today to submit my feedback (and the feedback of many others in the area) regarding the proposed development at 608 Commissioners Road West. As a resident of the Westmount area, I strongly object to the proposed 6-storey building being built on the corner of Commissioners Rd. and Westmount Crescent, and hope I can adequately explain why this development is not in the best interests of the area. I have read through the planning documents posted on the London website, and have compiled a list of objections to this proposed development, quoting various lines from the Planning & Design Report:

1. Parking lot exiting onto Westmount Cres. Instead of Commissioners Rd. With potentially 98 cars (95 units + 3 visitors) exiting onto Westmount Crescent, there will undeniably be adverse effects on the existing residential area. So many extra cars will increase the traffic trying to turn onto Commissioners Rd., particularly at peak times during the day, which will result in most people opting to cut through the neighborhood instead. Despite the Report finding in its Transportation Impact Assessment that “intersections are operating adequately without problematic movements during the AM and PM peak hours”, anyone who has driven through this neighborhood at peak hours knows that every entrance and exit to the neighborhood gets busy, particularly around Westmount Mall (i.e. where Westmount Crescent leads to). Given the neighborhood’s location between 3 major roads (Wonderland, Commissioners and Southdale), it is already busier than the average family suburban area and constantly used as a cut through to these major roads - this becomes clear when you notice the number of traffic-calming measures in the neighborhood, such as speed bumps on Cranbrook, Viscount, Farnham and McMaster. With all this information combined, it is not reasonable to believe that the addition of 95 units will not impact traffic in the existing residential area. While the proposed addition of a left turning lane onto Commissioners

may help to an extent, most people will not have the patience to wait behind several cars when they could alternatively turn onto Westmount Crescent and cut through the neighborhood – an unfortunate reality that the planning document failed to mention even once. On the contrary, the document claims that this building can be added "without significantly disrupting pedestrian movement or traffic operations in the area". This will absolutely increase the pedestrian and vehicle traffic in the area and convert the existing quiet streets such as Westmount Crescent into busy shortcuts for cars and people.

2. Only 3 visitor parking spots The proposed building will have 95 units yet only 3 visitor parking spots. Even if one assumes that each unit only contains one tenant (a gross underestimation), that means the odds of a tenant's guest finding an available parking spot is 3%. This without a doubt means that most guests will be parking on Westmount Crescent and the surrounding residential streets, further affect the existing neighborhood, and the existing residents' ability to find parking for their own guests (something that is already difficult to do).

3. Low-density area according to 1989 plan As the planning document noted, the 2016 London Plan is currently under appeal, meaning the 1989 Plan is still in effect. This 1989 Plan designates the area in question as a "low-density area", meaning that a building of this size and stature does not enhance, nor fit with, the existing neighborhood at all (which is a requirement for this zoning change to pass). Despite the neighborhood's proximity to the "hub" at Wonderland and Commissioners, the feeling within the neighborhood is very different. It is a peaceful, family-oriented neighborhood comprising of mainly detached single-family homes. It is a busy neighborhood compared to other suburban areas, but it is not busy enough for a 95 unit apartment building to fit in with the general vibe and sentiment of the neighborhood. As noted in the planning document, the houses on Westmount Crescent are single family homes with large lots and driveways – it's an area that families have moved to so they can live a quiet, suburban lifestyle. The addition of this building will ruin that, not "enhance" it, as the planning document claims. Aesthetically, this building will tower over the existing dwellings, making it impossible to miss. The abnormal heigh of the building combined with the constant coming and going of its tenants will make the area feel more like downtown than the suburbs, which is not why the residents and families within this neighborhood moved here.

4. Only 5 units are affordable housing We all understand that there is a housing crisis within this city, an issue that desperately needs to be addressed – but building 95 units and only making 5 of them affordable housing does not help the problem. When you compare the number of affordable housing units being added (5) to the number of extra units the company is trying to gain by changing the zoning (93, vs. the existing 2 that can be built with the current zoning), it becomes very clear that this building benefits the pockets of the builders and no one else. This has very little to do with fixing the housing crisis and a lot to do with making business owners money. Along the same lines as the previous point, this building is grossly out of place from a density standpoint as well. The document even states itself that "the proposed development will result in a net residential density of 212 UPH", while the "net residential densities will normally be less than 150 units per hectare (60 units per acre) outside of Central London". The area's existing UPH is 75, meaning the building company is seeking a 282% increase in what they are allowed to build, while only contributing 5% of the units back to the city in the form of low-income housing. Those number do not match up at all, showing that this will not help the housing crisis nor the existing neighorhood.

5. Residents clearly don't want this The sign for this new building, currently posted at Commissioners Rd. and Westmount Crescent has had a big, black "no" symbol spray painted on it for several weeks. There have been various conversations on social media about how residents don't feel this building belongs in this neighborhood (Figures 1, 2 and 3), and there is currently a petition on Change.org with nearly 30 signatures (and counting) objecting to this construction (Figure 4).

Figure 1: Screenshot of the "Cranbrook" neighborhood chat on the Neighborhood App.

Figure 2: Screenshot of the Neighborhood App (continuing the thread from Figure 1).

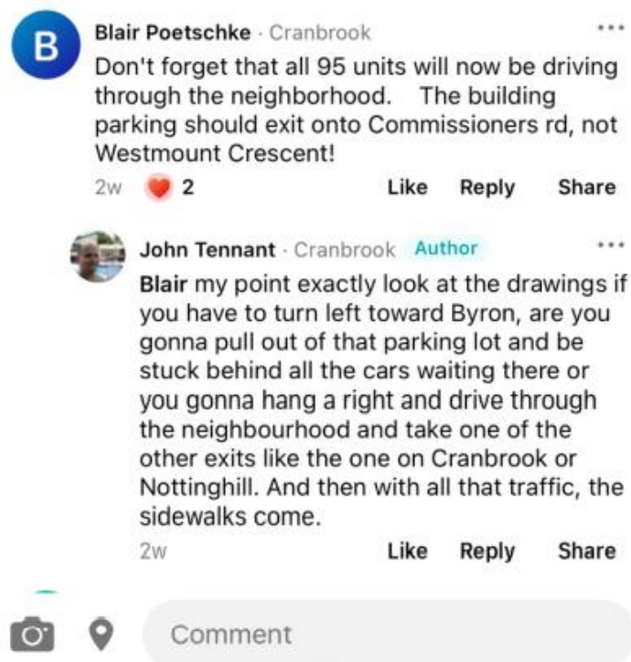


Figure 3: Screenshot of the Neighborhood App (continuing the thread from Figure 2).

Figure 4: Change.org petition, which can be found here: https://www.change.org/p/don-t-build-an-apartment-building-at-608-commissioners-rd-london-on

I understand that a lot of time and money goes into planning a building such as this, but those of us who live in the area and will be directly impacted by this building do not want it. It will inevitably increase traffic and congestion in what is already a busy area, and that is not why any of us moved here. I urge the city to listen to its constituents and do not proceed with this construction – it does not belong here. At the very least, exit the building onto Commissioners instead of into the neighborhood and significantly lower the number of units so the impact on the existing residential area is less. Please let me know if there's any other feedback I can provide and thank you very much for your time.

Sincerely, Asha Ramji

Community Petition – August 12, 2022

659 Westmount Crescent
London, ON N6K 1P3
alan.june649@gmail.com
August 11, 2022

Re: Application for rezoning of 608 Commissioners Road West, File Z-9516

To: Planning & Environment Committee

Between August 4 and August 9, 2022, we have collected 122 signatures from our immediate neighbourhood on a petition against the building of an apartment building of any size on the above site.

Our city councillor, Mr. Paul Van Meerbergen, will pick up the original of the petition on August 11, 2022, and will take it to City Hall to be distributed to the members of the Planning & Environment Committee and to Ms Alanna Riley in the City Planning and Development Department. Please confirm to the above email address that the petition has been copied for the Planning Committee.

We look forward to receiving information about the date that this application for rezoning will be considered by the Planning Committee.

Alan & June Burrell

PETITION

We, the undersigned residents of Westmount Crescent and surrounding area, object in the strongest possible terms to the construction of a six-storey apartment building on the site at 608 Commissioners Road West and 591 Westmount Crescent, application number Z-9516. Our reasons are given below.

- This building does not fit the neighbourhood. It would be surrounded by one and two-storey single family homes. There is nothing even approaching a building of this size in the neighbourhood.
- Vehicle traffic from this site should be exiting onto the arterial road, Commissioners Road West, and not the side street, Westmount Crescent. This would create a tremendous amount of traffic into our already traffic-calmed neighbourhood, creating an unsafe situation for people walking in the neighbourhood and children walking to and from school.
- The amount of parking proposed for the building (1 parking spot per unit for 95 units and 3 additional for visitors) is totally inadequate and below the amount that is required under this zoning. This will cause a great deal of on-street parking on Westmount Crescent, Rosecliffe Terrace, Jamaica Street, Jamaica Court, and other surrounding streets, creating an unsafe situation for people of all ages walking in the neighbourhood.
- The developer is pushing the limits in five areas under this zoning: height of building, density, amount of parking, lot coverage and side yard size, showing that this building is not well suited to this site.
- Additionally, not to mention concerns about, noise, sewer capacity, pollution, heat and rodents from 95 residential units in such a small space.

This site should be zoned for one or two floor condominiums, or at the most, two or three storey townhomes to better fit into the neighbourhood.

Petition respectfully submitted, on behalf of all the people who have signed, by Alan and June Burrell, 659 Westmount Crescent.

Agency/Departmental Comments

Parks Planning and Design, June 23, 2022:
Parkland dedication is required in the form of cash in lieu, pursuant to By-law CP-9 and will be finalized at the time of site plan approval.

Engineering, October 24, 2022:
Engineering has no concerns related to the re-zoning application.
The following items are to be considered during a future site plan application stage:

Water

- Water is available for the subject site via the municipal 300mm high-level watermain on Commissioners Road West.

Stormwater:

Specific comment for this site

-
- The site is tributary to the existing maintenance hole 7C129 on Commissioners Road West at a C=0.50 (16954, attached). Due to the intensification of the existing site the consultant is required to submit a report which is to include a sewer capacity analysis (design sheet) to demonstrate available capacity. This analysis shall include the delineation of upstream catchments areas and associated runoff coefficients, etc.

- As per the Drainage By-law, the consultant would be required to provide for a storm pdc ensuring existing peak flows from the 2 through 100-year return period storms are maintained pre to post development with any increase in flow being managed onsite. The servicing report should also confirm capacity in the existing sewers.

- As per the City of London's Design Requirements for Permanent Private Systems, the proposed application falls within the Central Subwatershed (case 4), therefore the following design criteria should be implemented:

    - the flow from the site must be discharged at a rate equal to or less than the existing condition flow.
    - the discharge flow from the site must not exceed the capacity of the stormwater conveyance system.
    - the design must account the sites unique discharge conditions (velocities and fluvial geomorphological requirements);
    - "normal" level water quality is required as per the MOE guidelines and/or as per the EIS field information; and
    - shall comply with riparian right (common) law.
    - The consultant shall update the servicing report and drawings to provide calculations, recommendations and details to address these requirements.

- As per 9.4.1 of The Design Specifications & Requirements Manual (DSRM), all multi-family, commercial and institutional block drainage is to be self-contained. The owner is required to provide a lot grading plan for stormwater flows and major overland flows on site and ensure that stormwater flows are self-contained on site, up to the 100-year event and safely convey the 250 year storm event.

- If number of proposed parking spaces exceeds 29, the owner shall be required to have a consulting Professional Engineer confirming how the water quality will be addressed to the standards of the Ministry of the Environment, Conservation and Parks (MECP) with a minimum of 70% TSS removal to the satisfaction of the City Engineer. Applicable options are outlined in the Stormwater Design Specifications & Requirements Manual.

- Any proposed LID solutions should be supported by a Geotechnical Report and/or a Hydrogeological Assessment report prepared with a focus on the type(s) of soil present at the Site, measured infiltration rate, hydraulic conductivity (under field saturated conditions), and seasonal high groundwater elevation. Please note that the installation of monitoring wells and data loggers may be required to properly evaluate seasonal groundwater fluctuations. The report(s) should include geotechnical and hydrogeological recommendations of any preferred/suitable LID solution. All LID proposals are to be in accordance

with Section 6 Stormwater Management of the Design Specifications & Requirements manual.

- An Operations and Maintenance manual should be provided as a separate report/manual identifying any implemented/constructed LIDs. For examples of such report contents please refer to the following website https://cvc.ca/low-impact-development/lid-maintenance-monitoring/

- General comments for sites within Central Thames Subwatershed

  - The subject lands are located within a subwatershed without established targets. City of London Standards require the Owner to provide a Storm/Drainage Servicing Report demonstrating compliance with SWM criteria and environmental targets identified in the Design Specifications & Requirements Manual. This may include but not be limited to, quantity control, quality control (70% TSS), erosion, stream morphology, etc.

  - The Developer shall be required to provide a Storm/drainage Servicing Report demonstrating that the proper SWM practices will be applied to ensure the maximum permissible storm run-off discharge from the subject site will not exceed the peak discharge of storm run-off under pre-development conditions up to and including 100-year storm events.

  - The Owner agrees to promote the implementation of SWM Best Management Practices (BMP's) within the plan, including Low Impact Development (LID) where possible, to the satisfaction of the City Engineer. It shall include water balance.

  - The owner is required to provide a lot grading plan for stormwater flows and major overland flows on site and ensure that stormwater flows are self-contained on site, up to the 100 year event and safely conveys up to the 250 year storm event, all to be designed by a Professional Engineer for review.

  - The Owner shall allow for conveyance of overland flows from external drainage areas that naturally drain by topography through the subject lands.

  - Stormwater run-off from the subject lands shall not cause any adverse effects to adjacent or downstream lands.

  - An erosion/sediment control plan that will identify all erosion and sediment control measures for the subject site and that will be in accordance with City of London and MECP (formerly MOECC) standards and requirements, all to the specification and satisfaction of the City Engineer. This plan is to include measures to be used during all phases of construction. These measures shall be identified in the Storm/Drainage Servicing Report.

Transportation

  - 608 Commissioners Rd W – width varies. In this instance the proper method to determine road widening required along Commissioners Road West adjacent to this property would be to establish the centerline of the road as shown on Plan E-083-Sheet 2 (attached) and then offset it by 21.0m.

  - The transfer of Parts 1 & 3 on this plan comply with the requested widening. See attached 33R-21251.

  - 6.0mx6.0m daylight triangle required at the intersection corner.

  - Detailed comments regarding access design and location will be made through the site plan process.

Municipal Housing, Planning and Development, October, 28, 2022

1. The subject site is located in Southwest London. The Canada Mortgage and Housing Corporation (CMHC) has identified Southwest London as having primary rental market vacancy rates of 1.2% for one-bedroom units, 1.1% for two-bedroom units, and 0.7% for three-bedroom units. Housing affordability in Southwest London is challenged given the existing vacancy rates;.

2. The locational attributes of the site are considered to be supportive of affordable housing development (proximity to regional and community shopping areas, transit);

3. Affordable rental units in market developments where additional height and/or density have been sought have been secured through regulations in a Bonus Zone. The regulations would typically include: unit set-aside; a percentage of Average Market Rent (by bedroom type) to be charged; and a period of affordability. These regulations would also require a Tenant Placement Agreement to align the affordable rental units to an identified municipal priority; and,

4. Bonus Zoning for the purpose of securing a commensurate public benefit is no longer a tool at the City's disposal. That being said, policy 502_ of the London Plan states that "Innovative tools will be explored…. to deliver housing that is beneficial to Londoners".

Heritage Planning, October 24,2022:

London
CANADA

MEMO

To: Alanna Riley, Senior Planner
From: Laura E. Dent, Heritage Planner
Date: October 24, 2022
Re: **Archaeological Assessment Requirements**
Heritage Comments
608 Commissioners Road West and
591 Westmount Crescent (Z-9516)

This memo is to confirm that I have reviewed the following and find both reports' (analysis, conclusions, and recommendations) to be sufficient to fulfill the archaeological assessment requirements for (Z-9516):

- Lincoln Environmental Consulting Corp. *Stage 1-2 Archaeological Assessment of 608 Commissioners Road West* [...] Middlesex County, Ontario (PIF P1289-0142-2021), January 2022.
- Lincoln Environmental Consulting Corp. *Stage 1-2 Archaeological Assessment of 591 Westmount Crescent* [...] Middlesex County, Ontario (PIF P1289-0224-2022), March 2022.

Please be advised that heritage planning staff recognizes the conclusion of both reports that state that: "[n]o archaeological resources were identified during the Stage 2 archaeological assessment of the study area, and as such **no further archaeological assessment of the property is recommended.**" (p 2)

An Ontario Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI) archaeological assessment compliance letters have also been received (*without technical review*):

- dated Jan 18, 2022 (MHSTCI Project Information Form Number P1289-0142-2021, MHSTCI File Number 0014979).
- dated Mar 31, 2022 (MHSTCI Project Information Form Number P1289-0224-2022, MHSTCI File Number 0016326).

Archaeological conditions can be considered satisfied for this application.

Sincerely,

Laura E. Dent, M.Arch, PhD, MCIP, RPP
Heritage Planner
Community Planning, Urban Design and Heritage
Planning & Development

300 Dufferin Avenue | London, ON N6A 4L9 | (519) 661-2489 | www.london.ca

Landscape Architect, June 26, 2022

1.A significant number of trees are growing along property lines. Any trees whose trunks cross a property line are considered a boundary tree and co-owned with neighbour. Boundary trees are protected by the province's Forestry Act 1998, c. 18, Sched. I, s. 21, and can't be removed without written consent from co-owner. It is the responsibility of the developer to adhere to the Forestry Act legislation and to resolve any tree ownership issues or disputes.

2. Removal of trees over 50cm dbh will require a Distinctive Tree Removal Permit issued by Forestry Operations prior to Site Plan Approval.

3. No person shall cause the injury or destruction of a city owned tree growing in a road boulevard unless a permit has been issued by Forestry Operations in compliance with the City of London Boulevard Tree Protection By-law - CP-22 https://london.ca/by-laws/boulevard-tree-protection-law-cp-22. Any person who contravenes any provision of the By-law is guilty of an offence. Conviction is liable to a minimum fine of $500.00 and a maximum fine of $100,000.00

4. In keeping with the London Plan, every effort should be made to preserve trees. Providing a minimum of 3m setbacks from property lines will protect the critical root zones [CRZ] of boundary and offsite trees. An inventory of trees, including those 3m offsite would need to be performed to determine specific CRZ. **Critical Root Zone**" means the area of land within a radius of ten (10) cm from the trunk of a tree for every one (1) cm of trunk diameter.

Urban Design. July 14, 2022

- Building Design:
  - Locate the principal building entrance on Commissioners Road W-facing elevation, and differentiate it from the individual residential unit entrances with architectural features such as canopies, signage, lighting, massing, increase in glazing, double doors, framing, materials, etc. ***[TLP 261_ & 290_].***
  - Provide for a step-back above the 4th storey to provide for a more human-scale environment along the Commissioners Road W ***[TLP 286_].***
  - Include active ground-floor uses such as the principal building entrance, lobbies, common amenity areas, and residential units with direct access to the sidewalk along the Commissioners Road W facing elevations in order to activate the street edge ***[TLP 291_].***
  - For any ground-floor street-facing residential units, include individual ground floor entrances with courtyards or “front porches” with access directly to the City sidewalk along the street frontage in order to activate the street edge. Raise units slightly above grade to provide privacy and reduce impacts of vehicle headlights ***[TLP 289_].***
  - Incorporate a variety of materials and textures to highlight different architectural elements and provide interest and rhythm, along the building (i.e., trim, framing, decorative masonry details, fenestration rhythm) ***[TLP 301_].***
- Site Design:
  - Provide underground parking as opposed to a parking structure to reduce impacts on the adjacent properties and the public realm, allow for perimeter tree plantings and a sufficiently sized outdoor shared amenity space ***[TLP 253_].***
    - If the parking structure is to remain, the structure must be located behind or integrated within the building and wrapped with active uses for the majority of the street frontage. The garage structure should be enclosed to avoid light-spill and noise impacts on the adjacent neighbourhood and treated with the materials similar to the main building facades ***[TLP 269_, 273_ & 276_].***
  - Provide a larger and more centrally located amenity space that is a sufficient size to accommodate the number of residential units proposed.
  - Provide sufficient space between any parking/drive aisles and the property lines to accommodate soil volumes that support large tree growth along property boundaries ***[TLP 258_].***

Urban Design Peer Review Panel Comments and Applicants Responses, October 25 , 2022

Comment No.	Comment	Response By	Response
1	While the Panel generally supports the increased density and proposed land use for the site, the Panel recommends the applicant revisit	Zelinka Priamo Ltd.	Noted. We are happy to re-visit the panel as required to demonstrate our improvements to the design

	the Panel at the Site Plan stage for further design review and comments.		
2	The Panel notes that the overall massing could benefit from additional step backs to break up the ‘bulkiness’ of the building. Consider stepping back portions of the fifth and sixth-floor bay windows along Westmount Crescent and Commissioners Road W.	Zelinka Priamo Ltd.	We have reviewed this request and are happy to report that our team has devised an alternative parking layout that completely removes the parking structure component. A combination of surface parking islands, landscape features and an enlarged (and appropriately sized) outdoor amenity space have been provided.
3	The Panel recommends relocating parking stalls located on the second floor of the parking structure to one level of below-grade parking. This will allow for a greater landscape buffer between Westmount Crescent and the low-rise neighbours to the South and West as well as free up more space at grade for landscaping. If the parking structure must remain, consider aligning the face of the parking structure with the building and reduce the overall size to retain the existing trees along the South and West Property Lines. Introduce landscape islands and planters on the surface of the parking structure to soften the	Zelinka Priamo Ltd.	We have reviewed this request and are happy to report that our team has devised an alternative parking layout that completely removes the parking structure component. A combination of surface parking islands, landscape features and an enlarged (and appropriately sized) outdoor amenity space have been provided.

	views from the residents, Westmount Crescent, and neighbouring properties		
4	The Panel notes that the current location of the outdoor amenity appears as an afterthought and is not sufficiently connected with the building. Consider providing a more generous and centralized landscaped amenity space, located at the South-West interior corner of the building to take advantage of the courtyard condition that L-shaped buildings naturally provide.	Zelinka Priamo Ltd.	Our team appreciates this comment and we have worked to push this lane as far to the North as possible. However, the removal of the existing hydro pole is cost prohibitive. Having said this, we would be happy to re-examine removing this item during the SPA process.
5	The Panel recommends that the lay-by/drop-off zone be shifted further North to align with the main residential entrance, provided it meets traffic considerations.	Zelinka Priamo Ltd.	Our team appreciates this comment and we have worked to push this lane as far to the North as possible. However, the removal of the existing hydro pole is cost prohibitive. Having said this, we would be happy to re-examine removing this item during the SPA process.
6	The Panel recommends introducing private residential entrances at-grade with streetlevel connections to create more active street frontages.	Zelinka Priamo Ltd.	Agreed. We have incorporated this comment into our documents which include private ground level patio spaces complete with concrete walkways which tie direction into the existing adjacent sidewalks.
7	The Panel notes that the main residential entrance is a little lack-lustre and difficult to locate. Consider additional articulation to attract and	Zelinka Priamo Ltd.	We have provided an extended canopy with an alternative material / colour to that of the primary building materials. Having said this, we would be happy to re-examine this item in more detail during the SPA process and subsequent Urban Design Panel Meeting(s).

	welcome residents and create a more inviting street presence.		
8	The Panel has concerns with the use of EIFS as the primary building material, especially as the building ages. Consider a more durable cladding material such as masonry or stone, particularly at ground level. Introduce warmer, textured materials such as wood accents to break up the stucco on the upper levels. Consider subtle changes in plane where two materials intersect to avoid coplanar conditions.	Zelinka Priamo Ltd.	Noted. We will discuss material in further detail with our client. At the present time we have broken up the façade with a darker material which could be ACM or Commercial Siding. We have also introduced moments of wood siding to provide a more balanced blend of materials for the entire building.

Upper Thames River Conservation Authority, June 16, 2022:
Please be advised that the subject lands ***are not*** affected by any regulations (Ontario Regulation 157/06) made pursuant to
Section 28 of the *Conservation Authorities Act*.
Accordingly, the UTRCA has no objections to this application and a Section 28 permit application is not required.

London Hydro, June 24, 2022

Reply Sheet for City of London Applications to be Reviewed by London Hydro Engineering

Date: June 24, 2022

To: City of London Planning Division – Room 609

Attn: Alanna Riley

RE: **Address:** 608 Commissioners Road West

Applicant: 608 Commissioners Inc. (c/o Copia Developments)

File/Ref #: Z-9516

London Hydro Response:

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.	☑
This site is presently serviced by London Hydro. Contact the Engineering Dept. if a service upgrade is required to facilitate the new building. 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.	☐
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. A blanket easement will be required. **Note:** Transformation lead times are minimum 16 weeks. Contact Engineering Dept. to confirm requirements & availability.	☐
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.	☑
London Hydro has no objection to this proposal or possible official plan and/or zoning amendment. However, London Hydro will require a blanket easement.	☐

Signed:

Hans Schreff
Manager - Developer & Operations Support,
Engineering & Operations Administration Dept.
519-661-5800 ext. 5014

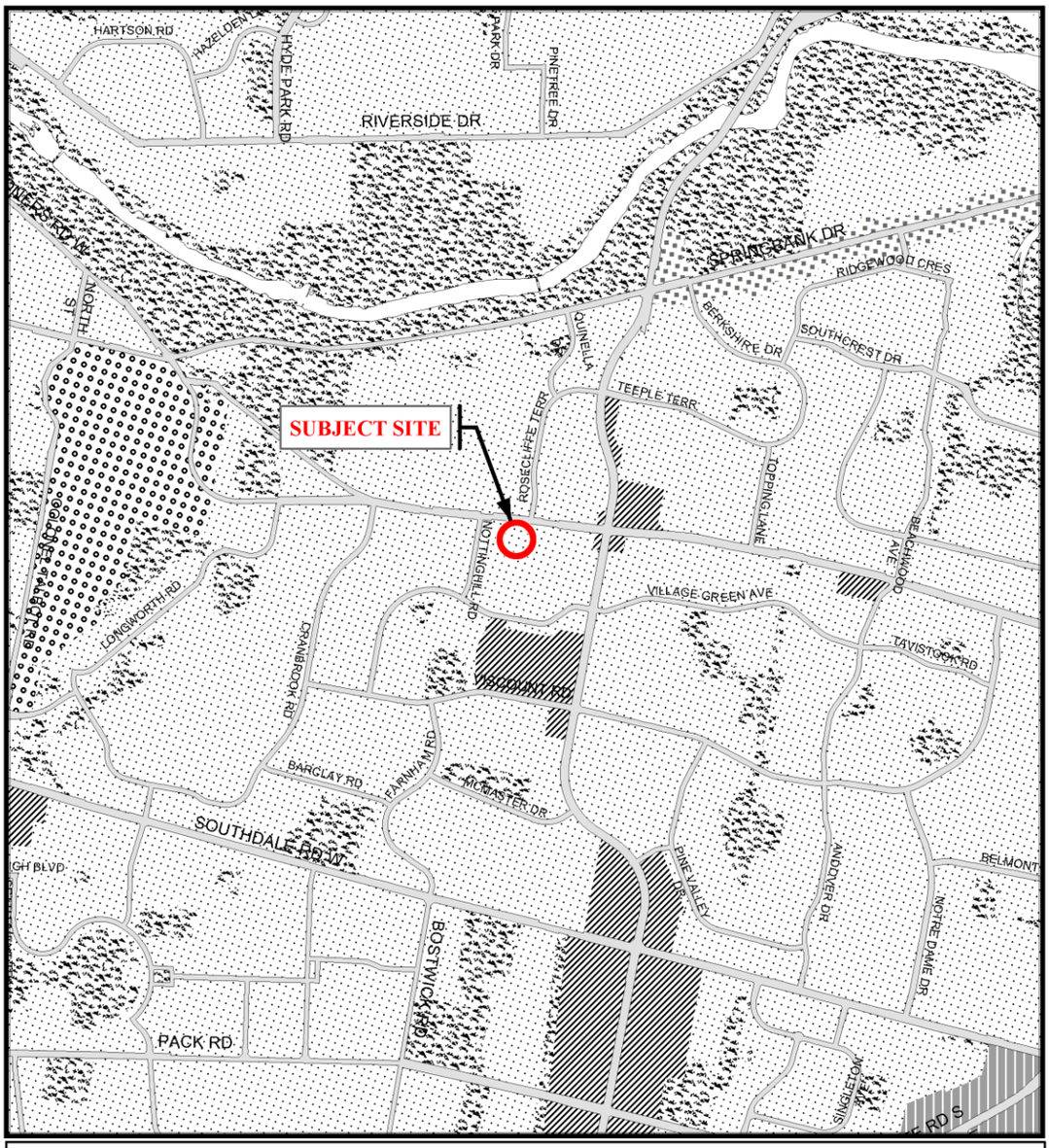
Appendix C – Evaluation Criteria

1577_Evaluation Criteria for Planning and Development Applications	
Criteria – General Policy Conformity	**Response**
Consistency with the Provincial Policy Statement and in accordance with all applicable legislation	The proposal is consistent with the Provincial Policy Statement as it provides for efficient development and land use patterns and for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area. There are no significant natural, cultural heritage, or archaeological resources requiring protection and no natural or man-made hazards to be considered.
Conformity with the Our City, Our Strategy, City Building, and Environmental Policies of this Plan	The proposal provides for residential intensification within the Urban Growth Boundary and supports Key Directions related to the creation of a mixed-use compact City and strong, healthy and attractive neighbourhoods. The massing and scale of the proposed buildings can be appropriately integrated into the community through the application of the relevant City Design policies at the Site Plan Approval stage.
Conformity with the policies of the place type in which they are located	The proposal provides for a use and intensity of development contemplated within the Neighbourhoods Place Type on a Civic Boulevard Street Type.
Consideration of applicable guideline documents that apply to the subject lands	No additional guideline documents apply to the subject site.
The availability of municipal services, in conformity with the Civic Infrastructure chapter of this Plan and the Growth Management/Growth Financing policies in the Our Tools part of this Plan	The site will be fully serviced by municipal water, sanitary and storm.
Criteria on Adjacent Lands	**Response**
Traffic and access management	The proposed development will incorporate a right-in/right-out driveway to access the site. A Traffic Impact Assessment was not required as part of this application. Transportation Staff have no concerns.
Noise	The proposed development is not expected to generate any unacceptable noise impacts on surrounding properties. A noise study was not required for the Zoning By-law amendment application.
Parking on streets or adjacent properties	Adequate parking is provided for the proposed development, as required by the Zoning By-law and Site Plan Control By-law. Parking on streets or adjacent properties is not anticipated.
Emissions generated by the use such as odour, dust or other airborne emissions	The proposed development will not generate noxious emissions.
Lighting	Lighting details will be addressed at the Site Plan Approval stage. It is a Site Plan standard that any lighting fixture is to minimize light spill onto abutting properties.

Garbage generated by the use	Site Plan Control covers waste collection along with mail pick (door-to-door or shared location), snow storage and other site functionalities. Waste collection is tied to the approved site plan for the Site Plan Approval Development Agreement.
Privacy	A variety of screening and buffering mechanisms are proposed to maintain or enhance privacy between the proposed development and adjacent lands. The use of trees and vegetation (where possible), fencing, and landscaping, along with large setbacks are proposed. Given the variety of screening and buffering, along with the large setbacks and step backs on the buildings, an appropriate level of privacy is maintained for both residents in the surrounding neighbourhood and future residents of the proposed development. Additional mitigation measures will be considered at the time of Site Plan Approval, such as additional plantings.
Shadowing	A shadow study was conducted, and minor shadowing may impact adjacent properties in the early morning or late afternoon, depending on the season. Existing off-site mature trees to the south, east, and west of the subject lands currently provide shadowing on abutting lands. New or additional shadow impacts would be considered minor in nature.
Visual Impact	The proposed buildings are to be of high architectural quality and finish and will create a compatible development with attractive visual impacts. Landscaping will be implemented through the Site Plan Approval process to further screen the building from the south and west. The building will provide an attractive street presence on the south side of Commissioners Road West and the west side of Westmount Crescent.
Loss of Views	There are no view corridors to significant features or landmarks to be affected by the proposed development.
Trees and canopy cover	A Tree Preservation Plan was submitted by the applicant, which provide details of specific tree removals and trees to be retained. All trees that can be reasonably retained are shown as such. Trees that conflict with building construction, or trees that pose a hazard are to be removed. At the Site Plan stage, a complete landscape plan will be developed to provide for new tree planting and screening from adjacent land uses.
Cultural heritage resources	The subject lands are identified as having archaeological potential on the City's 2018 Archaeological Mapping. Based on the findings from the Stage 1-2 Archaeological Assessment prepared by Lincoln Environmental Consulting Corp and the letter received by The Ontario Ministry of Heritage, Sport, Tourism, Culture Industries (MHSTCI) no archaeological resources were identified on the lands and all archaeological conditions can be considered satisfied for this application.
Natural heritage resources and features	Not applicable.
Natural resources	Not applicable.

Appendix D – Relevant Background

The London Plan



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 Planning & Development's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

CITY OF LONDON
Official Plan

LONDON PLAN MAP 1
- PLACE TYPES -

PREPARED BY: Planning & Development

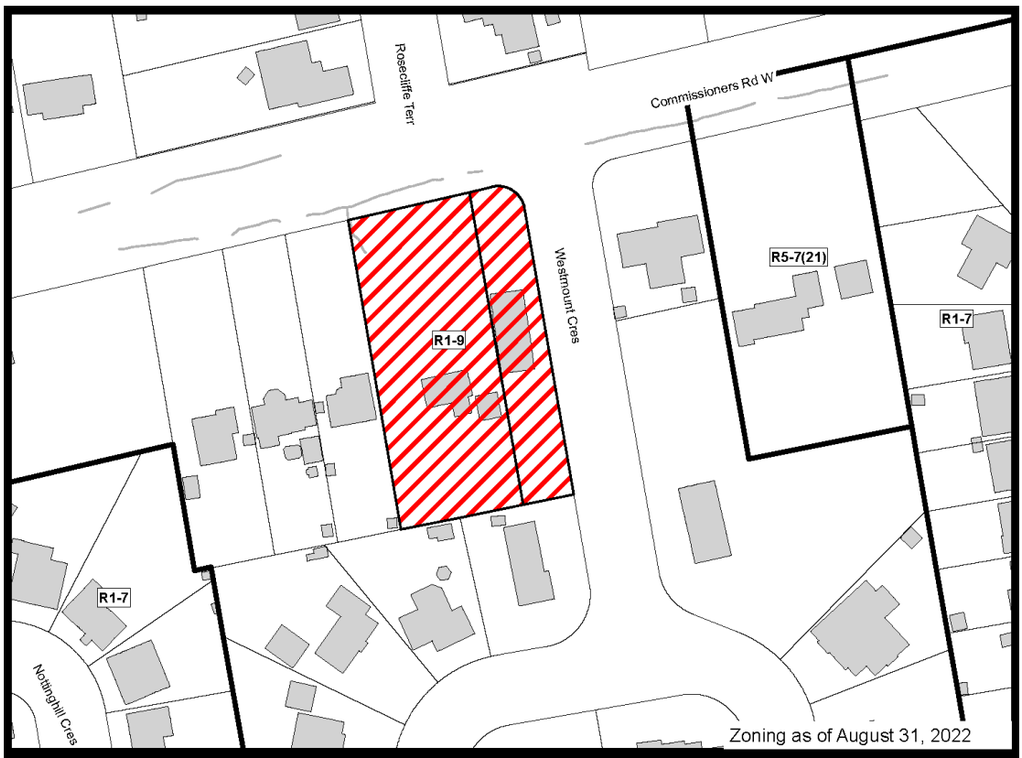
Scale 1:30,000

0 112.5 225 450 675 900 1,125
Meters

File Number:	Z-9516
Planner:	AR
Technician	JI
Date:	2022/10/25

Project Location: E:\Planning\Projects\p_officialplan\workconsol00\excerpts_LondonPlan\mxds\z-8516_Map1_PlaceTypes_b&w_8x14.mxd

Zoning By-law Z.1- Zoning Excerpt



COUNCIL APPROVED ZONING FOR THE SUBJECT SITE: R1-9

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

R1 - SINGLE DETACHED DWELLINGS
R2 - SINGLE AND TWO UNIT DWELLINGS
R3 - SINGLE TO FOUR UNIT DWELLINGS
R4 - STREET TOWNHOUSE
R5 - CLUSTER TOWNHOUSE
R6 - CLUSTER HOUSING ALL FORMS
R7 - SENIOR'S HOUSING
R8 - MEDIUM DENSITY/LOW RISE APTS.
R9 - MEDIUM TO HIGH DENSITY APTS.
R10 - HIGH DENSITY APARTMENTS
R11 - LODGING HOUSE

DA - DOWNTOWN AREA
RSA - REGIONAL SHOPPING AREA
CSA - COMMUNITY SHOPPING AREA
NSA - NEIGHBOURHOOD SHOPPING AREA
BDC - BUSINESS DISTRICT COMMERCIAL
AC - ARTERIAL COMMERCIAL
HS - HIGHWAY SERVICE COMMERCIAL
RSC - RESTRICTED SERVICE COMMERCIAL
CC - CONVENIENCE COMMERCIAL
SS - AUTOMOBILE SERVICE STATION
ASA - ASSOCIATED SHOPPING AREA COMMERCIAL

OR - OFFICE/RESIDENTIAL
OC - OFFICE CONVERSION
RO - RESTRICTED OFFICE
OF - OFFICE

RF - REGIONAL FACILITY
CF - COMMUNITY FACILITY
NF - NEIGHBOURHOOD FACILITY
HER - HERITAGE
DC - DAY CARE

OS - OPEN SPACE
CR - COMMERCIAL RECREATION
ER - ENVIRONMENTAL REVIEW

OB - OFFICE BUSINESS PARK
LI - LIGHT INDUSTRIAL
GI - GENERAL INDUSTRIAL
HI - HEAVY INDUSTRIAL
EX - RESOURCE EXTRACTIVE
UR - URBAN RESERVE

AG - AGRICULTURAL
AGC - AGRICULTURAL COMMERCIAL
RRC - RURAL SETTLEMENT COMMERCIAL
TGS - TEMPORARY GARDEN SUITE
RT - RAIL TRANSPORTATION

"h" - HOLDING SYMBOL
"D" - DENSITY SYMBOL
"H" - HEIGHT SYMBOL
"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-9516 AR

MAP PREPARED: 2022/10/25 JI

1:1,500

0 5 10 20 30 40 Meters