

# Comments on Proposals O-9354 and Z-9355

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In accordance with Section 24 of the Planning Act, R.S.O. 1990, c. P. 13, no public work shall be undertaken and no by-law shall be passed for any purpose that does not conform with this [The London] Plan. ... some examples ... include: Approvals of planning and development applications such as official plan amendments, zoning by-law amendments, ... [32]

The decisions City Council makes will conform with The London Plan ... Being open and transparent in its decision making will allow all Londoners to see that the values, vision, and priorities of the Plan are being adhered to in every decision City Council makes.[52]

## Summary

We are the couple who own and live at 185 Forest Hill Ave. In reviewing the proposed official plan and zoning amendment O-9354/Z-9355 (257-263 Springbank Dr.), the associated site plan, the London Plan, and Zoning By-law No. Z-1, we have come to the conclusion that the proposed 6-story, 38-unit, mid-rise, apartment complex is simply too big for these lots and not a good fit for the character of the area.

On the first point, it runs contrary to the vision and balance expressed in the London Plan, other mid-rise sites in the area, and the standard yard depths for the proposed R9-Residential zone. The raw unbuffered intensification and deforestation this would force on the adjoining neighbours' lots is entirely out of the character of the neighbourhood, and frankly lacks basic decency (who would want this done to them?).

On the second point, the other side of the street is slated for a massive 51m high-density twin-tower apartment building due to an OMB ruling when the city only wanted a 6 story mid-rise. The Forest Hill Ave./Wildwood Ave. loop has approximately 70 homes on it. The towers will add on the order of 270 units. This is significantly more intensification than the area was supposed to see. This proposal would then add another 38 units.

The official plan amendment is also troublesome. It would be enacting specific bits of the London Plan that are not yet settled (or in force) without also enacting all their context, such as the many items speaking to mitigating impact on adjacent neighbourhood areas and encouraging underground parking.

## Introduction

Forest Hill Ave connects at the back with Wildwood Ave to form a "U" shaped loop off the north side of Springbank Dr. immediately west of the coves. There are no other entrances or exits to this area. Our house is the second along the interior on the Forest Hill Ave. side of the loop. Due to the way the lots are laid out, a significant portion of our backyard runs adjacent to the extended north-west part of the proposal, so we will be considerably affected by this development.

We have been spending significant time and effort to attempt to educate ourselves on the London Plan and how municipal zoning works. We ask the city to keep in mind though that neither we, nor our neighbours, will be able to match the depth of knowledge, prior experience, or resources that the developer will be able to marshal to their case. Our arguments to the finer points of the process will necessarily be less complete and less effective than those of the developer. We will also undoubtedly fail entirely to represent our interests in areas of importance that we will not even be aware exist until we find ourselves experiencing them, at which point it will be too late.

## Issues with the Official Plan Amended

One of the effects of the London Plan will be to redesignate the area of Springbank Dr. west of The Coves that is Auto-Oriented Commercial Corridor to be Urban Corridor. While currently under LPAT appeal (our understanding is these issues are likely to be taken up in 2022) it would seem likely that this will make a broader range of developments, including mid-rise residential, part of the plan. The city official plan amendment that is part of this proposal is to essentially jump the gun on this process by creating a Specific Policy Area in the old designation to enact the likely inclusion of mid-rise residential units for the sake of this proposed re-zoning.

It seems reasonable that the Ministry of Municipal Affairs and Housing and the Local Planning Appeal Tribunal (LPAT) will take a dim view of a selective circumvention of the Planning Act's approval process. This would also set a precedent for cherry-picking bits from parts of the London Plan that are still under review and bringing them into force without their broader context (e.g., the Urban Corridor type place encourages underground or structured parking integrated into the building, tree canopy cover targets are to be set in the Zoning By-law, etc.).[395,841] The London Plan explicitly states that it is to be considered in its entirety.[36] It also explicitly forbids creating Specific Policy Areas that set general precedences.[1730,1731]

## Failure to Mitigate Impacts on the Neighbourhood and Fit into and Retain its Character



Figure 1: Entrance to Forest Hill Ave./Wildwood Ave. loop as currently is.

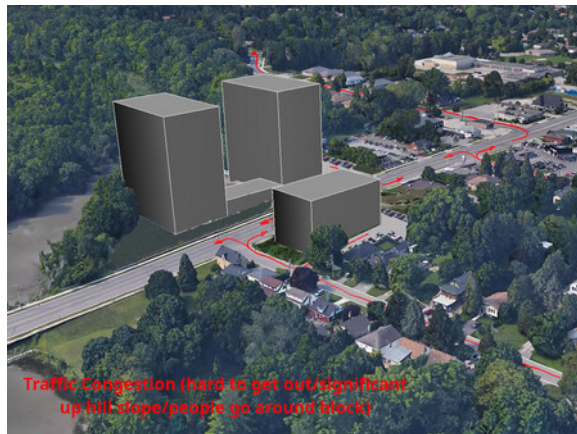


Figure 2: Entrance to Forest Hill Ave./Wildwood Ave. after developments (this and the towers).

The London Plan has an entire chapter dedicated to the fact that London is the Forest City. How our urban forest transcends public and private ownership (over three-quarters of it is on private property).[382,383] How it is critically important to the structure and ecological function of much of our Natural Heritage system, how it improves watershed health, controlling water movement above and below the ground, and how it reduces erosion and surface runoff (the plan identifies the loop as a Significant Groundwater Recharge Area and a Highly Vulnerable Aquifer), how it helps mitigate the impacts of climate change, how it gives us shade, spiritual well-being, and an overall higher quality and longevity of life, how it increases the value of our properties, and how it is critical to London's overall identity and prosperity.[382,383,386-388]

One of the key characteristics of the Forest Hill Ave./Wildwood Ave. loop, as implied in both names, is the captured forest in its interior. Composed of an interlocking canopy of massive mature trees, it towers over the (many single-story) houses on the loop, forms a highly visible omnipresent treescape at all points in the neighbourhood, and blocks out the city. Talking to the residents quickly reveals that it is this which makes the neighbourhood and the individual lots so special. A little piece of paradise in a big city.

The London Plan speaks to the criticality of actively protecting and planting the trees in order to reverse the decline in canopy that has been occurring and eventually return us to a 34% coverage.[389,391,393,394] It specifies that all trees are to be inventoried, that large mature shade trees (trees of distinction) on sites should be preserved, that new ones are to be planted, that the site needs to be planned so these trees have long-term viability, and that parking lots need to have significant tree canopy coverage.[399,401]

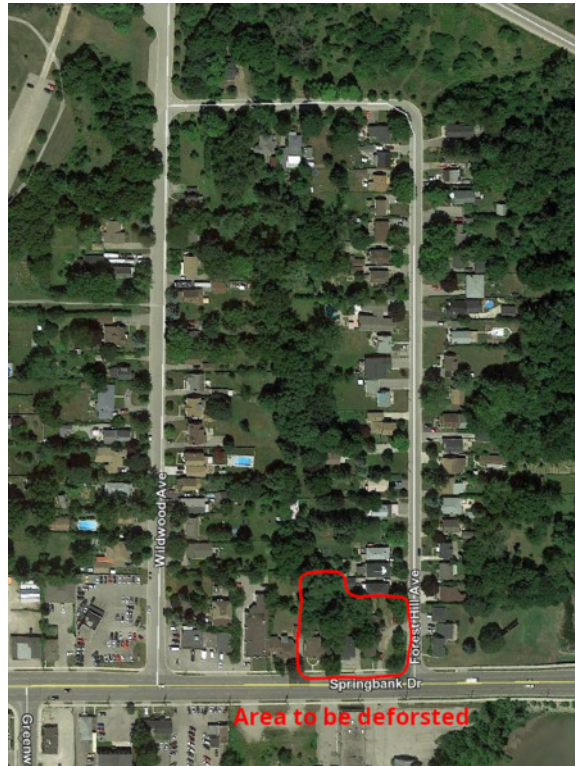


Figure 3: Area of loop to be deforested under plan.

In contrast to this, the proposed plan is to destroy all the mature interior trees and replace them with a small-shrub delimited parking lot that extends right up to the adjacent residential units on all sides. As seen in the figures, this will deforest the south-east chunk of the loop. The only tree to be preserved is one city tree on the north-east corner of the far east lot, and the only replacement trees are to be a few city trees on the perimeter road allowances. At some point, with road expansions (Springbank Dr. will require significant widening to bring it in line with Urban Corridor street's vision in the Mobility Section), these trees will likely go too.

Intensification is supposed to be done in a way that is sensitive to existing neighbourhoods, represents a good fit, and retains both public and private existing trees.[83,160] Buildings, and especially those at key entry points into neighbourhoods, are to be designed to articulate and to help establish the character, identity, and sense of place.[199,202,210,284] The site layout is to fit in the context of the existing character of the surrounding area, to minimize impact on adjacent properties, incorporate desirable trees, and parking lots are to be designed to include a sustainable tree canopy and landscape area.[252,253,258,277,282]

While the plan allows for access to developments along Urban Corridor using side-streets, it stipulates that such access must be done in a way that minimizes the impact on internal portions of the adjacent neighbourhoods.[841] It stipulates proposals are to be evaluated on, among other things, their potential impact for traffic and access management and causing parking on the street and adjacent properties.[1578] Given that the proposal asks for a 20% reduction in the standard parking allotment (1.3 per units down to 1.0 per unit), it seems safe to assume that there are going to be parking issues (e.g., where is the visitor parking, what about two-vehicle households?).

Exiting towards downtown (to the left/east) out of the Forest Hill Ave. is already tricky due to the limited uphill visibility (to the right/west). When Springbank Dr. is busy, people already drive around the loop and exit via Wildwood Ave. There are only around 70 homes in the loop. The twin towers that OMB has forced through immediately across from the loop will add around 270 units worth of people entering and exiting this same area of Springbank Dr. It is safe to assume that Forest Hill Ave. will go from difficult, to almost impossible to exit during key hours and all the traffic from these additional 38 units, plus existing 70 homes already on the loop, will instead circulating around the entire loop and exit on the Wildwood Ave. side. This will be a major impact on the entire neighbourhood which is currently quiet, has no sidewalks, and people stroll along on their way to the Greenway and Kensal parks.

## Failure to Manage and Mitigate Impact on Adjacent Lots

A growing city needs intensification. While the details are not fully worked out yet due to appeals, the London Plan lays out that Springbank Dr. between The Coves and Wonderland Rd. is to be an Urban Corridor place type, and Urban Corridor places types are to target a moderate level of intensity (less than the Rapid Transit Corridor place type) that would eventually see mid-rise residential and mixed-use development. On the surface, this proposal would appear to fit well into this plan. As intensification can both create and destroy value, however, the plan does not just seek to promote intensification, but also to protect the existing value in order to manage and direct it to the greatest effect.

To this end, it speaks a great deal to the character of neighbourhoods and places, and how development proposals, and especially those at key entry points into neighbourhoods, need to fit with the character.[199,202,284] It sets out how intensification along the Urban Corridor place type needs to manage the interface, be sensitive to adjacent land use, and provide transitioning heights or sufficient buffers.[298,830,832,840] It speaks to lots having to be of sufficient size, how lots further into the neighbourhood may need to be consolidated to provide sufficient transitioning and buffers, and that the Urban Corridor designation is not a blanket approval for the full extent of intensity everywhere.[826,834,840] It notes that there are primarily residential segments, without large amounts of commercial floor space, that will only allow for small-scale commercial uses.[826]

Everyone on the Forest Hill Ave./Wildwood Ave loop will tell you that the urban forest is a key characteristic, if not *the* characteristic, of the neighbourhood (the other is the camaraderie of the neighbours). This is fully in line with The London Plan, which states that trees are part of a neighbourhood's character and treescape should be recognized as so too.[210,237] Nowhere is this more apparent than in our backyards. The trees and treescape blots out the city and it is replaced by the hush of a forest and the chirp of birds. It is hard to describe the immersiveness of it unless you have ever walked the trails of places like Reservoir Park and Medway Creek. Then you know. It is the reason we bought our property.

Contrary to all the aforementioned bits of the London Plan, the proposed development will not preserve and enhance the character of the neighbourhood and buffer and mitigate its impact on those of us with adjacent lots. Rather it will strip us of the very thing we cherish. Our privacy and the complete nature immersion will be gone if much of the treescape that towers over our single-story home to the south is replaced with six



Figure 4: Our backyard looking north near the entrance.



Figure 5: Our backyard looking north deeper into the yard.

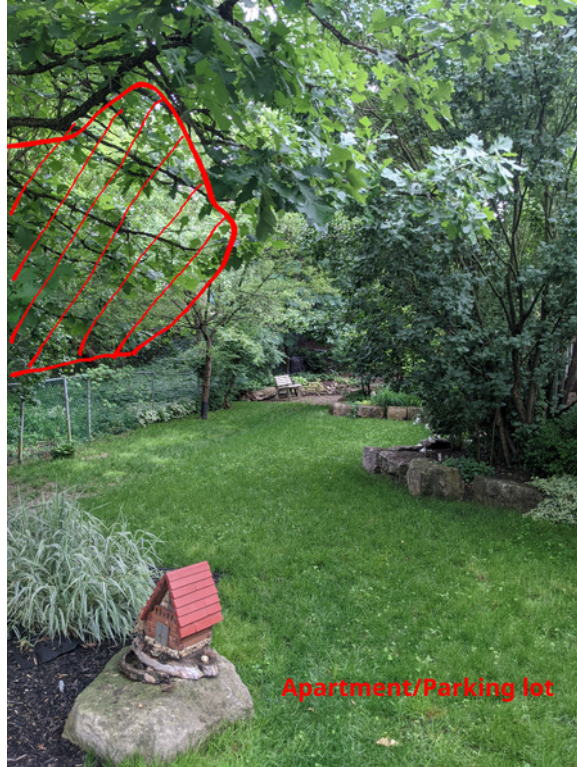


Figure 6: Our backyard looking west partway into the yard will be exposed.



Figure 7: Our backyard looking south deeper into the yard will be exposed.



Figure 8: Our backyard looking south near the entrance will be exposed.



Figure 9: Our southern neighbour's backyard will be entirely exposed.

stories of apartment building staring down on us. The south ground view in the back half of our yard will be the extended north-west portion of the parking lot. The same will be true on the residential property to the west of the sites. Our neighbours, whose property forms the north-east corner cut out of the amalgamated lots, will be entirely surrounded on side and back by apartment and parking lot.

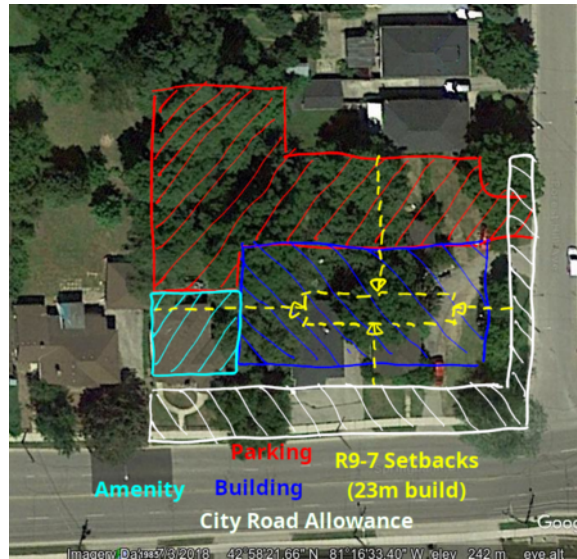


Figure 10: Site plan overlay with R9-7 setback regulations (Zoning By-law Table 13.3)

While it isn't yet clear how the Urban Corridor type place will be recognized with respect to zoning requirements (part of why approving this now under the Urban Corridor vision is jumping the gun), the proposal is to for the current R9-7 designation. R9-7 is the highest density form of the R9 medium and higher density designations. This is to be contrasted with the aforementioned Urban Corridor vision of place appropriate moderate levels of intensity, with lesser levels along the primarily residential segments lacking large floor space.[826,840] Nonetheless, we have tabulated the setback requirements given in Table 13.3 of the city's Zoning By-law for an R9-7 zoning abutting a R1 or R2 residential zone in the following table and overlaid them with the site plan onto satellite imagery.

yard depth	minimum	proposed
front	10m	0.5m
exterior side	10m	2.3m
rear	23m	15.0m
interior side	23m	13.8m

Clearly, there are significant issues. Even with the proposed extremely reduced front and exterior side setbacks, the 1:1 height to setback ratio required on the rear and interior sides does not leave enough space for the building. Further, while the Urban Corridor place type does specify that buildings are to be situated close to the front lot to assist with rear setback, accepting the level of reduction proposed in this case will create future issues. If the Urban Corridor street vision for Springbank Dr. is to be realized (it has been classified for widening), the city will needs its full road allowance, and this will result in six stories of balconies with virtually no setback over the future pedestrian zone.[371,372,841,1737] It also seems doubtful that the R9 requirement for 30% landscaped open space is being met.

In addition to the loss of privacy and neighbourhood character, the building shadowing needs to be addressed.[1578,1681] The [online shadow calculator](#) shows the building would cast significant shadows over our lot, and, even at high noon, have our neighbour's lot (the north-east corner cut out of the amalgamated lots) under almost complete shadow from early September to July. The high-level of visibility and the negative



lighting impacts of the parking lot also needs addressing.[278,279,745] The parking precludes on-site garbage pickup under the Site Plan Control By-law (garbage trucks have a 12m centreline turning radius and they are not to have to backup), so large bins will have to be wheeled out to the curb for collection once or twice a week, negatively impacting the adjacent lots and neighbourhood character. Nor is it clear how snow removal will work with no free space (e.g., where will it be piled, where will residents park while it is being cleared)?

## Conclusion

Everything about this simply says the proposal is too large for the size of the acquired lots. Much of the raised issues can be avoided by proper sizing and following the plan. Underground and structured parking integrated within the building design is encouraged for the Urban Corridor place type.[270,841] Reducing the height of the building and integrating the parking into/under it would allow for the preservation of the distinct trees and associated urban forest at the back of the lots. This would help maintain the character of the neighbourhood, be beneficial to the residents of the building, be consistent with the directives regarding trees of distinction and preservation and enhancement of the urban forest, meet the required setbacks, and go a long way to mitigating and buffering the impact on the adjacent residential lots.[252,253,258,270,277-279,282,284,298,386-389,391,393-395,399,401,745,830,832,840,841,1578,1681]

Another option is that the lots could be used for small-scale commercial as suggested in the plan for parts of Urban Corridor that are primarily residential areas.[826] Many people we have talked to have expressed how nice it would be to have some small-scale coffee shops and restaurants like those found on the corners of Wortley Village. Business would likely be very good given they would be situated immediately across, and the closest amenities to, the twin high-density towers the OMB has forced through. Yet another option would be for the developer to invest in upgrading and restoring the properties as the residential lots they are. This has been done elsewhere on the Forest Hill Ave./Wildwood Ave. loop and, from talking to the developer, in the current market it is a very profitable, immediate option.



# London Plan References

The following are all referenced points from the London Plan, including resolutions from the April 15 2021 LPAT ruling (case PL170100), which brought into effect most forestry related items, that are not yet in the PDF version of the London Plan on the city website. Points that still remain under appeal are in *italics*.

## **Our Challenge (1-50)**

### **How to Use The London Plan**

#### **Legislative Basis of the London Plan**

...

32. In accordance with Section 24 of the Planning Act, R.S.O. 1990, c. P. 13, no public work shall be undertaken and no by-law shall be passed for any purpose that does not conform with this Plan. While not limited to the following, some examples of municipal initiatives and actions that must conform with the Official Plan include:

1. Approvals of planning and development applications such as official plan amendments, zoning by-law amendments, ...

...

...

#### **Format of the London Plan**

...

36. The London Plan is more than a set of individual policies – no policy stands on its own. The Plan is to be read in its entirety and the relevant policies are to be applied to each situation.

...

## **Our Strategy (51-63)**

### **Values**

52. The following values will guide how we undertake our planning processes as a municipality:

1. Be accountable – The decisions City Council makes will conform with The London Plan and be consistent with the Provincial Policy Statement. Being open and transparent in its decision making will allow all Londoners to see that the values, vision, and priorities of the Plan are being adhered to in every decision City Council makes.

...

## **Our City (64-183)**

### **City Structure Plan**

#### **The Growth Framework**

##### Intensification

...

83. 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. ...

...

#### **Urban Regeneration**

...

160. Existing trees, both public and private, should be retained in accordance with an environmental impact study and/or a tree preservation plan, through the review of redevelopment and intensification projects.

...

## **City Building Policies (184-745)**

### **City Design**

#### **How Are We Going to Achieve This?**

##### **Character ...**

199. ... development proposals within existing and new neighbourhoods will be required to articulate the neighbourhood's character and demonstrate how the proposal has been designed to fit within that context...

...

202. Buildings and public spaces at key entry points into neighbourhoods will be designed to help establish a neighbourhood's character and identity.

...

210. Trees should be recognized, maintained and planned for as important features of a neighbourhood's planned character and sense of place.

##### **Streetscapes ...**

237. Treescapes should be recognized as important features of a neighbourhood's planned character.

...

##### **Site Layout**

252. The site layout of new development should be designed to respond to its context and the existing and planned character of the surrounding area.

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

...

258. The layout and grading of a site should retain and incorporate desirable trees.

...

## Parking

270. The location, configuration, and size of parking areas will be designed to support the planned vision of the place type ...

...

277. Surface parking lots should be designed to include a sustainable tree canopy at 20 years of anticipated tree growth.

278. Surface parking located in highly-visible areas should be screened by low walls and landscape treatments.

279. Lighting of parking areas will be designed to avoid negative light impacts on adjacent properties.

...

282. Surface parking areas will be designed to incorporate landscape areas for visual amenity, to assist with stormwater management, and reduce the heat island effect.

...

## Buildings

284. All planning and development proposals will be required to demonstrate how the proposed building is designed to support the planned vision of the place type and establishes character and a sense of place for the surrounding area. This will include matters such as scale, massing, materials, relationship to adjacent buildings, heritage impact and other such form-related considerations. ...

...

298. Design measures relating to building height, scale and massing should be used to provide a transition between development of significantly different intensities, considering the existing and planned context.

...

## Mobility

### How Are We Going to Achieve This?

#### Streets ...

371. The following policies describe the goals, function and character to be used in the design of the right-of-way for each street classification:

...

#### 5. Civic Boulevard

- a. Priority on pedestrian, cycle and transit movements
- b. Moves medium to high volumes of vehicular traffic
- c. Very high-quality pedestrian realm
- d. Very high standard of urban design

...

372. Table 6 - Street Classification Design Features provides the design features for each street classification, relating to the street design zones shown in Figure 21. These design features will ensure that the goals, function, and character identified for each street classification are achieved. While all of these criteria should be met, there may be instances where they are not achievable based upon the specific context.

Table 6. Civic Boulevard: 36m right-of-way, cycle facility, left/right turn lanes, sidewalk, street trees, landscape planters, grass boulevard ...

...

## Forest City

### What is Forest City

382. London has been known as The Forest City since the mid 1850's and we, as residents, are passionate about our Urban Forest. ... It transcends public and private ownership and consists of both individual and groups of trees in environmentally significant areas, ..., and in private yards.

383. ... there were over 4.4 million trees within the Urban Growth Boundary, approximately 3.3 million of which were on private property. ...

...

### Why is the Forest City Important to our Future?

386. Trees provide the structure and ecological functions for much of our Natural Heritage System ... stabilize slopes and replenish our soil ... provide functional and pleasing streetscapes, back yards, and site development features .... They create the context for great places.

387. Trees mitigate the impacts of climate change ... They give us spiritual well-being and an over-all higher quality and longevity of life ... improve watershed health by controlling water movement above and below the ground ... reducing erosion and surface runoff ... increase property values .... Trees benefit not just the owners of the property on which they are located, but all of society.

388. The Urban Forest is integral to London's identity and overall prosperity. As the Urban Forest is strongly influenced by land use decisions and development patterns, the planning, protection, and enhancement of London's Urban Forest is important for building an attractive, well-designed, and functional city environment. ...

### What Are We Trying to Achieve

389. Our goal is to plan for, and manage, our Urban Forest proactively such that:

...

- 3. Our tree canopy cover increases over time.
- 4. The city's growth and development is managed over the long term to protect, conserve, and enhance the Urban Forest in a sustainable manner.
- 5. Our Urban Forest is managed and invested in as infrastructure, and trees are valued as important assets.

...

### How Are We Going To Achieve This

#### Urban Forest Strategy ...

391. The following three main strategies will be employed to manage our forest and to achieve the goals of this Plan:

- 1. Protect more - protect existing trees, woodland ecosystems, and other vegetation.

...

...

- 393. It is a target of this Plan to achieve a tree canopy cover of 28% within the Urban Growth Boundary by 2035.
- 394. The 20-year target identified above is intended help us to achieve a long-term tree canopy cover of 34% within the Urban Growth Boundary by 2065.
- 395. Specific tree canopy cover and other targets for specific place types will be developed through the Urban Forest Strategy Implementation Plan and implemented through the Zoning By-law and other by-laws and guideline documents.

...

**Strategic Approach** Protect More

399. The following policies will be applied to support the strategy of protecting trees:

- 1. Tree inventories and tree preservation plans will be required for planning and development applications and infrastructure projects where trees exist on the applicable lands.
- 2. Tree inventories will be prepared to identify the trees on a site that may be impacted by the proposed development. Tree inventories may not be required for those treed areas that are to be retained. Tree preservation plans are to identify trees to be retained, removed, mitigated, and replaced by new tree planting.
- 3. Distinctive trees that are deemed healthy or structurally sound should be retained.
- 4. Where, having considered all options, there are no reasonable alternatives to tree removal, the following shall apply to allow for development that conforms with the policies of this Plan:
  - a. A tree inventory will be prepared to record all trees over ten centimetres in diameter, measured at a height of 1.4 metres above the ground. All trees that are identified as species at risk shall be inventoried regardless of their size.
  - b. Trees will generally be replaced at a ratio of one replacement tree for every ten centimetres of tree diameter that is removed. Guidelines, municipal standards, or by-laws may be prepared to assist in implementation of this policy.

...

...

Plant More

401. The following policies will be applied to support the strategy of planting more trees in London:

...

- 2. Tree planting will focus on the preferential planting of large shade tree species where possible to maximize long-term benefits.

...

- 5. Where shade trees are proposed to be planted in areas of ... sidewalks, ..., parking lots ..., best management practices and green infrastructure techniques may be required as a condition of development, in order to

...

- 10. Ensure that an adequate level of tree planting has been incorporated into developments for visual aesthetics, shade, cooling, and establishing quality pedestrian environments in neighbourhoods and within sites, in conformity with the policies of this Plan.

- 11. A tree planting plan may be required for planning and development applications and implemented and enforced through appropriate planning and development conditions. ...

...

- 14. Surface parking lots should be designed to include a sustainable tree canopy. Appropriate soil volume, drainage, and appropriate technology will be used to ensure the long-term sustainability of these trees.

...

## **Green and Healthy City**

### **How Are We Going to Achieve This?**

#### **Dark Skies**

- 745. We will support initiatives to reduce glare, light trespass, and skyglow to promote energy conservation, reduce impacts on wildlife, and support healthy neighbourhoods.

## **Place Type Policies (746-1292)**

### **Urban Place Types**

#### **Rapid Transit and Urban Corridors**

##### **Our Vision for the Rapid Transit and Urban Corridor Place Types**

- 826. ... Not all the segments of our corridors will be the same in character, use and intensity. Some segments will be primarily residential in nature, allowing only for small-scale commercial uses. In other segments, where large amounts of commercial floor space already exist, opportunities will be made for new stand-alone commercial uses while opening new opportunities for mixed-use development.

...

##### **How Will We Realize our Vision**

- 830. ... We will realize our vision for our corridors by implementing the following in all the planning we do and the public works we undertake:
  - 4. Plan for a mix of residential and a range of other uses along corridors to establish demand for rapid transit services.

...

- 6. Carefully manage the interface between our corridors and the adjacent lands within less intense neighbourhoods.

##### **Interpretation of Corridor Place Type Boundaries ...**

- 832. ... intensification will be encouraged along these corridors, while managing and mitigating impacts on adjacent, lower-intensity residential areas.

...

- 834. ... consolidation of lots ... such that a property may be developed in accordance with the vision for the Corridor, while managing and mitigating potential impacts on the adjacent neighbourhood ... lot depths up to 150m along these corridors may be appropriate ...

...



**General use, intensity and form policies for Rapid Transit and Urban Corridors** Intensity

...

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

- 1. *Development within Corridors will be sensitive to adjacent land uses and employ such methods as transitioning building heights or providing sufficient buffers to ensure compatibility.*

...

- 4. *Lots will be of sufficient size and configuration to accommodate the proposed development and to help mitigate planning impacts on adjacent uses.*

...

- 8. *The Zoning By-law will include regulations to ensure that the intensity of development is appropriate for individual sites.*

- 9. *The full extent of intensity described above will not necessarily be permitted on all sites within the Rapid Transit and Urban Corridor Place Types.*

**Form**

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

...

- 2. Buildings should be sited close to the front lot line, to create a pedestrian-oriented street wall along Corridors and provide appropriate setback from properties that are adjacent to the rear lot line.

- 3. While access to development along Corridors may be provided from “side-streets”, such accesses to development will be located and directed in a manner that minimizes impacts on the internal portions of adjacent neighbourhoods.

...

- 12. ... Underground parking and structured parking integrated within the building design is encouraged.

- 13. Buildings will be designed to mitigate the impact of new development on adjacent neighbourhood areas.

## **Our Tools (1566-1795)**

### **Planning and Development Applications**

#### **Evaluation Criteria for Planning and Development Applications**

...

1578. All planning and development applications will be evaluated with consideration of the use, intensity, and form that is being proposed. The following criteria will be used to evaluate all planning and development applications:

...

- 2. Conformity with the Our City, Our Strategy, City Building, and Environmental policies of this Plan.

- 3. Conformity with the policies of the placetype in which they are located.

...

6. Potential impacts on adjacent and nearby properties in the area and the degree to which such impacts can be managed and mitigated ... potential impacts on nearby properties may include such things as:
- a. Traffic and access management.
  - b. Noise.
  - c. Parking on streets or adjacent properties.
  - d. Emissions generated by the use such as odour, dust, or other airborne emissions.
  - e. Lighting.
  - f. Garbage generated by the use.
  - g. Privacy.
  - h. Shadowing.
  - i. Visual impact.
  - j. Policy Deleted.
  - k. Trees and canopy cover.
  - l. Cultural heritage resources.
  - m. Natural heritage features and areas.
  - n. Natural resources.
  - o. Other relevant matters related to use and built form

The above list is not exhaustive.

7. The degree to which the proposal fits within its context. ... it will need to be shown that the proposal is sensitive to, and compatible with, its context. ... an analysis of fit may include such things as:

...

- c. Neighbourhood character.

...

- f. Height.
- g. Density.
- h. Massing.
- i. Scale.
- j. Placement of building.
- k. Setback and step-back
  - l. Relationship to adjacent buildings
- m. Landscaping and trees.
- n. Coordination of access points and connections.
- o. Other relevant matters related to use, intensity and form.

The above list is not exhaustive.

...

## **Planning and Development Controls**

### **Site Plan Control**

Matters Addressed by Site Plan Control

1681. To achieve these objectives, matters such as those that follow will be addressed through site plan control:

...

7. Measures to minimize any loss of sunlight and privacy to adjacent properties.

...

### **Specific Area Policies**

...

1730. The adoption of policies for Specific Areas may be considered in limited circumstances where the following conditions apply:

...

2. The proposed policy does not have an adverse impact on the integrity of the place type policies or other relevant parts of this Plan.
3. The proposed use is sufficiently unique and distinctive such that it does not establish an argument for a similar exception on other properties in the area.

...

5. The proposed policy is in the public interest, and represents good planning.

1731. Policies for Specific Areas will not be permitted if there are no distinguishing or unique features of the site that ... would establish an argument of precedent for similar specific area policies.

...

## **Acquisition of Lands for Streets and Other Mobility Infrastructure**

### **Highways to be Widened and Extent of Widenings**

1737. All streets shown on Map 3 - Street Classifications will be considered highways to be widened for the purposes of the Planning Act.

...