Report to Planning and Environment Committee

To: **Chair and Members**
Planning and Environment Committee
From: **Scott Mathers, MPA, P.Eng.**
Deputy City Manager, Housing and Community Growth
Subject: **1904747 Ontario Inc.**
10 Marley Place
File Number: OZ-25129, Ward 11
Public Participation Meeting
Date: **January 6, 2026**

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of 1904747 Ontario Inc. relating to the property located at 10 Marley Place:

(a) the proposed by-law attached hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting on January 20, 2026, to amend the Official Plan, The London Plan, by **ADDING** a new policy to the Specific Policies for the Neighbourhoods Place Type and by **ADDING** the subject lands to Map 7 – Specific Policy Areas – of the Official Plan;

(b) the proposed by-law attached hereto as Appendix "B" **BE INTRODUCED** at the Municipal Council meeting on January 20, 2026, to amend Zoning By-law No. Z.-1, in conformity with the Official Plan, The London Plan, to change the zoning of the subject property **FROM** a Residential R3 (R3-1) Zone **TO** a Residential R5 Special Provision (R5-7(_)) Zone;

(c) The Site Plan Approval Authority **BE REQUESTED** to consider the following design issues through the site plan process:

i) Adherence to the recommendations of the Heritage Impact Assessment, TMHC Inc., 2025, to ensure compatibility with on-site and adjacent cultural heritage resources;
ii) Collaborate with heritage staff and the applicant through the Heritage Alteration Permit (HAP) process to establish a building design that is sensitive to and compatible with the Wortley Village-Old South Heritage Conservation District; and
iii) Provide enhanced all season landscaping beyond that required by the Site Plan Control By-law, with a minimum of 50% native species.

(d) **IT BEING NOTED**, that the above noted amendments are being recommended for the following reasons:

i) The recommended amendment is consistent with the *Provincial Planning Statement, 2024 (PPS)*, which encourages the regeneration of settlement areas, conservation of cultural heritage, and land use patterns within settlement areas that provide for a range of uses and opportunities for intensification and redevelopment;
ii) The recommended amendment conforms to The London Plan, including, but not limited to the evaluation criteria for Specific Policy Areas, Key Directions, City Building policies, Place Type policies, Cultural Heritage policies, and the Our Tools policies; and
iii) The recommended amendment facilitates development a site within the Built-Area Boundary and the Primary Transit Area with a scale and intensity that can be appropriately accommodated and will contribute to achieving a diverse range and mix of housing options within the area.

Executive Summary

Summary of Request

The applicant has requested an amendment to the Official Plan, The London Plan, to add a Specific Policy to the Neighbourhoods Place Type in The London Plan, and to add the lands to Map 7 – Specific Policy Areas to permit stacked townhouse dwellings. Additionally, the applicant has requested an amendment to Zoning By-law No. Z.-1 to rezone the lands from a Residential R3 (R3-1) Zone to a Residential R5 Special Provision (R5-7(_)) Zone with special provisions to facilitate the proposed development.

Purpose and the Effect of Recommended Action

Staff are recommending approval of the requested Official Plan and Zoning By-law Amendments with special provisions. The recommended action will permit the development of 2.5-storey stacked townhouse building containing **eight (8) new residential units** in addition to the existing four (4) unit residential building, for an overall total of 12 residential units.

Linkage to the Corporate Strategic Plan

This recommendation will contribute to the advancement of Municipal Council's 2023-2027 Strategic Plan in the following ways:

- **Strategic Plan Area of Focus: Wellbeing and Safety**, by promoting neighbourhood planning and design that creates safe, accessible, diverse, walkable, healthy, and connected communities.
- **Strategic Plan Area of Focus: Housing and Homelessness,** by supporting faster/ streamlined approvals and increasing the supply of housing with a focus on achieving intensification targets.
- **Housing and Homelessness**, by increasing access to a range of quality, affordable, and supportive housing options that meet the unique needs of Londoners.

Analysis

1.0 Background Information

1.1 Previous Report Related to this Matter

Wortley Village-Old South Heritage Conservation District – O-8118 – 2013

Additional Residential Units Interim Control By-law – By-law No. CP-1600-300 – 2025

On November 4, 2025, Council approved an interim control by-law restricting the size and number of bedrooms associated with new Additional Residential Units (ARUs) on all lands within the city boundary. This by-law is in force and effect for one year from the date of its passing. During this period, no new ARU may be established within the City unless it complies with the specified conditions. For more information, please visit the website: Additional Residential Units | City of London.

1.2 Property Description and Location

The subject lands, municipally known as 10 Marley Place, are located on the east side of Marley Place in the South London Planning District. Comprised of a total area of approximately 0.22 hectares, the site has approximately 31.4 metres of frontage along Marley Place. The site contains an existing (c.1878) single detached dwelling which is currently being converted to include three (3) additional residential units (ARUs) for a total of four (4) units. The subject lands are also identified as a heritage designated property within the Wortley Village-Old South Heritage Conservation District. The subject lands currently have vehicular access provided by a single driveway on the north side of the property from Marley Place. The site also benefits from direct connections to municipal sidewalks and convenient access to public transportation.

Site Statistics:

- Current Land Use: Single detached dwelling with three (3) ARUs
- Frontage: 31.4m (Marley Place)
- Depth: 69.0m
- Area: 0.22ha (2,159.5m²)
- Shape: Rectangular
- Located within the Built Area Boundary: Yes
- Located within the Primary Transit Area: Yes

Surrounding Land Uses:

- North: Residential
- East: Residential/office conversions
- South: Residential
- West: Residential/commercial

Existing Planning Information:

- The London Plan: Neighbourhoods Place Type fronting a Neighbourhood Street
- Map 9: Wortley Village-Old South Heritage Conservation District
- Existing Zoning: Residential R3 (R3-1) Zone



Figure 1 - Aerial photo of the subject lands and surrounding area.


Figure 2 - Streetview of the subject lands (view from Marley Place facing east)

2.0 Discussion and Considerations

2.1 Development Proposal

The applicant is proposing the development of a 2.5 storey stacked townhouse building containing eight (8) units, in addition to the retention of the existing four (4) unit residential building, for an overall total of 12 residential units. The existing building is proposed to be retained, maintaining the existing streetscape along Marley Place, while undergoing internal renovations to allow for three (3) (ARUs). The townhouse building is proposed to be situated in the rear yard, screened from the street by the existing building and enhanced landscaping. A common outdoor amenity space is proposed to be provided between the existing building and proposed townhouse building. Private amenity space is also proposed by way of sunken patio spaces and decks for the townhouse building. Vehicular access will be provided via a new driveway on the south side of the existing building from Marley Place, leading to a parking area containing nine (9) surface parking spaces. The existing driveway access will be removed. Pedestrian connections are also proposed throughout the development, linking the units to the amenity space, parking area, and existing municipal sidewalks. The conceptual site plan is shown in Figure 3 and conceptual massing model shown in Figure 4.

The proposed development includes the following features:

- Land use: Residential
- Built Form: Single detached dwelling with additional residential units/Stacked townhouse dwellings
- Height: 2.5 storeys (9.0m)
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- Total Residential Units: 12 units
- Density: 55uph
- Lot Coverage: 23%
- Landscape Open Space: 47%
- Parking Spaces: 9 spaces (0.75 spaces/unit)

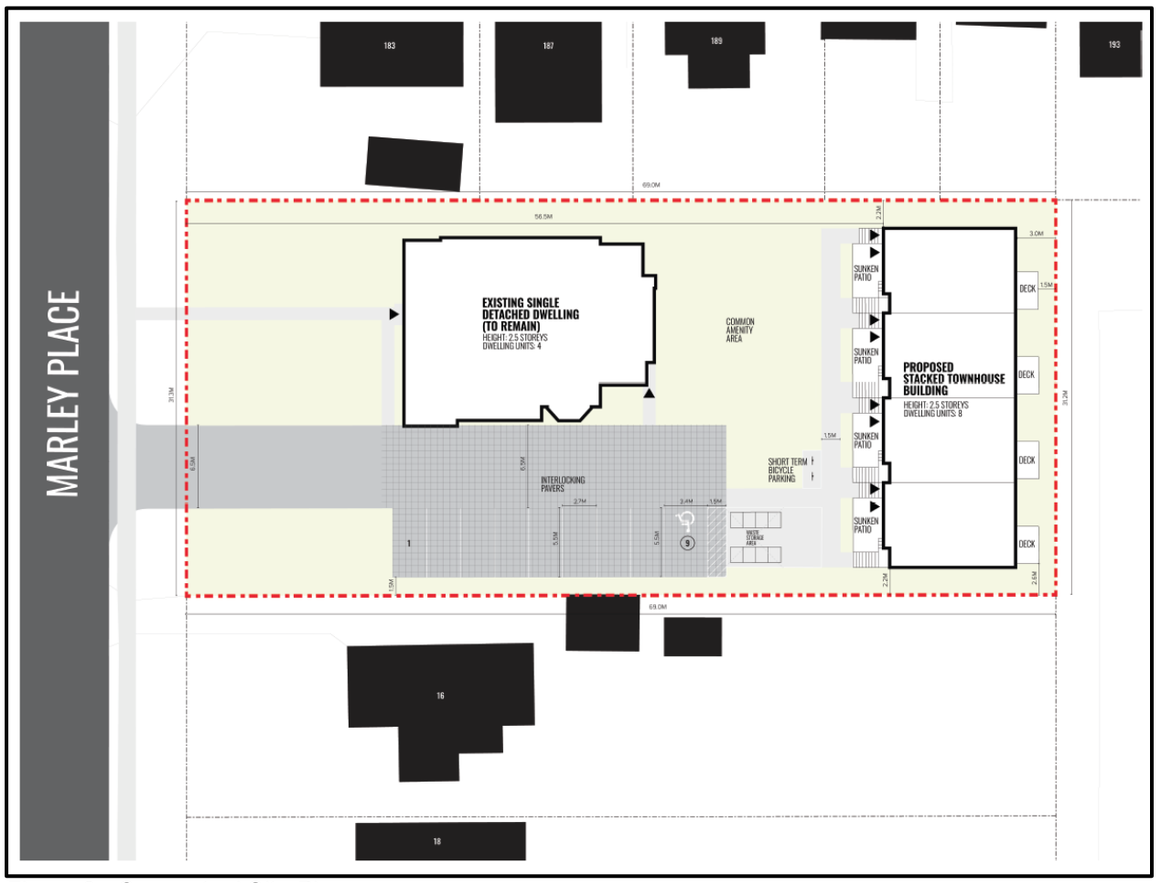


Figure 3 - Conceptual Site Plan

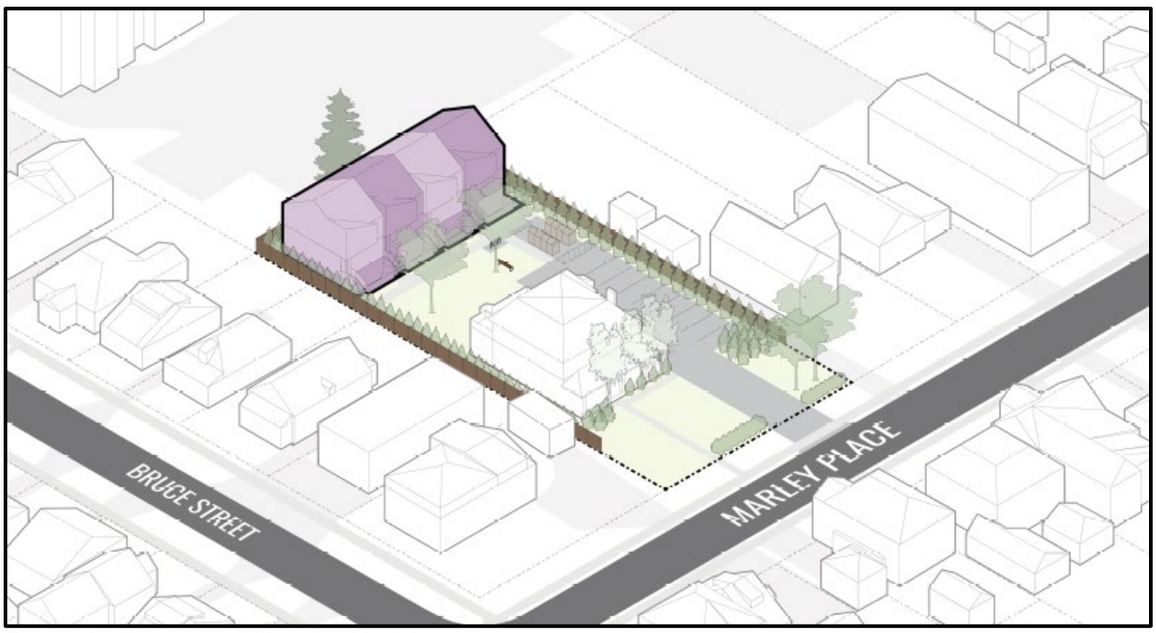


Figure 4 – Conceptual Massing Model

Additional plans and drawings of the development proposal are provided in Appendix C of this report.

2.2 Requested Amendments

The applicant has requested an amendment to the Official Plan, The London Plan, to add a Specific Policy to the Neighbourhoods Place Type in The London Plan, and to Map 7 – Specific Policy Areas to permit stacked townhouse dwellings.

Additionally, the applicant has requested an amendment to Zoning By-law No. Z.-1 to rezone from a Residential R3 (R3-1) Zone to a Residential R5 Special Provision (R5-7(_)) Zone with special provisions to facilitate the proposed development. The following table summarizes the special provisions that have been proposed by the applicant.

Regulation (R5-7(_))	Required	Requested	Recommended
Additional Permitted Uses	--	Single detached dwellings Additional residential units	As requested
Interior Side Yard Depth (minimum)	4.25m	2.2m	2.2m when the end wall of a unit contains no windows to habitable rooms
Rear Yard Depth (minimum)	6.0m	3.0m	As requested
Rear Yard Second Storey Deck (minimum	6.0m	1.5m	As requested
Height (maximum)	12.0m	10.5m	As requested
Parking Setback (minimum)	1.5m	--	2.0m
Parking Location	Interior or rear yard	--	Front yard parking is prohibited.

2.3 Internal and Agency Comments

The application and associated materials were circulated for internal comments and public agencies to review. Comments received were considered in the review of this application and are addressed in Section 4.0 of this report.

Key issues identified by staff and agencies included:

- The property at 10 Marley Place is designated and included within the Wortley Village-Old South Heritage Conservation District (HCD) in which Heritage Alteration Permit (HAP) approval is required. A HAP approval was received for alterations to the existing residential building but not yet obtained for the proposed 2.5 storey stacked townhouse dwellings.
- Staff agree with the Heritage Impact Assessment (HIA), noting the proposal generally aligns with the goals/policies/guidelines of the Wortley Village-Old South HCD; however, the application could result in direct and indirect impacts to the on-site and adjacent protected heritage properties. As such, the mitigation recommendation in the HIA must be implemented.
- The proposed rear yard and parking area setbacks are insufficient to mitigate impacts on abutting properties.
- The first parking space is currently in front of the existing building whereby the parking area should be shifted to ensure the parking space is not in the front yard.
- The functionality of the waste collection point needs to be clarified.

Detailed internal and agency comments are included in Appendix D of this report.

2.4 Public Engagement

On October 23, 2025, Notice of Application was sent to 163 property owners and residents in the surrounding area. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on October 30, 2025. A "Planning Application" sign was also placed on the site.

There was **twenty (20)** response as well as a submission on behalf of surrounding neighbours received during the public consultation period. Comments received were considered in the review of this application and are addressed in Section 4.0 of this report.

Key issues identified by the public included:

- Compatibility with the Heritage Conservation District guidelines whereby the development and new parking spaces do impact upon the street and surroundings, and cultural heritage resources.
- A further scaling back of the height might need to be considered.
- Use and density are too intense for a short/side street (4 townhouse units would be more appropriate)
- Insufficient parking and parking impacts on community aesthetics
- Traffic and safety concerns
- Environmental impacts
- Use is precedence setting with no public benefit or justification

Detailed internal and agency comments are included in Appendix E of this report.

2.5 Policy Context

The Planning Act and the Provincial Planning Statement, 2024

The Provincial Planning policy framework is established through the *Planning Act* (Section 3) and the *Provincial Planning Statement, 2024* (*PPS*). The *Planning Act* requires that all municipal land use decisions affecting planning matters shall be consistent with the *PPS*. The mechanism for implementing Provincial policies is through the Official Plan, The London Plan. Through the preparation, adoption and subsequent Ontario Land Tribunal (OLT) approval of The London Plan, the City of London has established the local policy framework for the implementation of the Provincial planning policy framework. As such, matters of provincial interest are reviewed and discussed in The London Plan analysis below.

Section 1 of the PPS outlines the vision to build more homes for all Ontarians, targeting a goal of at least 1.5 million homes built by 2031. Ontario aims to increase the supply and mix of housing options to address the full range of housing affordability needs. The PPS directs that all communities will plan to build housing that responds to evolving market needs and local demand. Ontario's land use planning framework, and the decisions that are made, shape how our communities grow and prosper – now and into the future (PPS, Section 1). In addition, the PPS promotes densities for new housing that efficiently use land, resources, infrastructure and public service facilities while supporting active transportation. Planning authorities are specifically directed to provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents that addresses the full range of housing options, including affordable housing, while promoting densities that efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation, and requiring transit-supportive development and prioritizing identification (PPS 2.2.1.a,c,d).

The *PPS* directs planning authorities to provide for an appropriate range and mix of housing options and densities to meet projected requirements by maintaining, at all times, the ability to accommodate residential growth for a minimum of 15 years, through lands which are designated and available for residential development (*PPS* 2.1.4.a). Planning authorities are encouraged to identify and focus growth and development in strategic growth areas to support the achievement of complete communities (PPS 2.4.1.1). This includes identifying the appropriate type and scale of development in strategic growth areas and the transition of built form to adjacent areas (PPS 2.4.1.3). At the same time, protected heritage property, which may contain built heritage resources or cultural heritage landscapes, shall be conserved. Specifically, planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property unless the heritage attributes of the protected heritage property will be conserved (PPS 4.6.3).

Based on the above, staff agrees that the subject lands are appropriate for residential intensification, in a form and scale of development that is compatible with the Heritage Conservation District guidelines. Staff are satisfied that the requested amendments are consistent with the PPS policies with respect to building homes and sustaining strong and complete communities. The amendments strategically focus growth and development within the City's Built Area Boundary and Primary Transit Areas, at a scale and intensity that can be appropriately accommodated and will contribute to achieving a diverse range and mix of housing options within the area.

The London Plan, 2016

The London Plan (TLP) includes evaluation criteria for all planning and development applications with respect to use, intensity and form, as well as with consideration of the following (TLP 1577-1579):

1. Consistency with the Provincial Policy Statement and all applicable legislation.
2. Conformity with the Our City, Our Strategy, City Building, and Environmental policies.
3. Conformity with the Place Type policies.
4. Consideration of applicable guideline documents.
5. The availability of municipal services.
6. Potential impacts on adjacent and nearby properties in the area and the degree to which such impacts can be managed and mitigated.
7. The degree to which the proposal fits within its existing and planned context.

Staff are of the opinion that all the above criteria have been satisfied.

Specific Area Policies

The London Plan includes conditions for evaluating the appropriateness of Specific Area Policies where the applicable place type policies would not accurately reflect the intent of City Council with respect to a specific site or area (TLP 1729-1734).

The following conditions apply when considering a new Specific Area Policy:

1. The proposal meets all other policies of the Plan beyond those that the specific policy identifies.
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.
4. The proposed use cannot be reasonably altered to conform to the policies of the place type.
5. The proposed policy is in the public interest and represents good planning.

Staff are of the opinion that all the above conditions have been satisfied. An analysis addressed in Section 4.0 of this report.

Wortley Village-Old South Heritage Conservation District (HCD), 2014

On November 9, 2009, Municipal Council approved City staff's recommendation that the Old South area become the next area considered for designation under Part V of the Ontario Heritage Act. The Wortley Village-Old South HCD Plan is intended to assist in the protection and conservation of the unique heritage attributes and character of the area.

The purpose of the HCD Plan is to establish a framework by which the heritage attributes and cultural heritage value or interest of Wortley Village-Old South will be protected and conserved, as well as managed and enhanced as the community evolves and continues to change over time. It will provide residents and property owners with clear guidance regarding appropriate conservation, restoration, and alteration activities and assist municipal staff and Council in reviewing and making decisions on Heritage Alteration Permit and development applications within the HCD.

The Wortley Village-Old South HCD Plan was reviewed in its entirety and informed staff's recommendations on the requested amendments.

3.0 Financial Impact/Considerations

3.1 Financial Impact

None.

4.0 Key Issues and Considerations

4.1 Land Use

The subject lands are in the Neighbourhoods Place Types fronting a Neighbourhood Steet (Marley Place) as identified on Map 1 – Place Types and Map 3 – Street Classifications in The London Plan. Permitted uses within the Neighbourhoods Place Type where properties front on a Neighbourhood Street include single detached dwellings, semi-detached dwellings, multiplex up to 4 units, converted dwellings, townhouses, additional residential units, home occupations and group homes (Table 10 – Range of Permitted Uses in Neighbourhoods Place Type). The existing four (4) unit residential building, undergoing internal renovations to allow for three (3) (ARUs) in addition to the single detached dwelling is a contemplated use. However, as the Residential R5 Zone does not permit this use, staff are recommending a special provision to permit cluster single detached dwellings as an additional permitted use. In accordance with regulation 4.37.1 of Zoning By-law No. Z.-1, ARUS will also be permitted in association with the single detached dwelling.

The proposed stacked townhouse dwellings are not a contemplated use where a property fronts onto a Neighbourhood Street. As stacked townhouses are not permitted,

the applicant has requested an amendment to the Official Plan, The London Plan, to add a Specific Policy Area to the Neighbourhoods Place Type to permit this use.

4.1.1 Conditions for evaluating the appropriateness of Specific Area Policies

As identified in Section 2.5 of this report, staff are of the opinion that the requested amendment satisfies the conditions of Policy 1730_, which apply when considering a new Specific Area Policy. An analysis of the relevant criteria is provided below:

_1. The proposal meets all other policies of the Plan beyond those that the specific policy identifies.

The requested amendment conforms to The London Plan, including, but not limited to, the Key Directions, Cultural Heritage policies and Our Tools policies. The amendment will facilitate development at a scale and intensity that can be appropriately accommodated on the subject lands while maintaining compatibility with the Heritage Conservation District guidelines through the implementation of the mitigation measures outlined in the HIA.

Additionally, the subject lands are strategically located within the City's Built Area Boundary and Primary Transit Area, both of which are integral to achieving the City's growth management objectives. These objectives include a target of 45% of all future residential growth within the Built-Area Boundary (TLP 91_) and 75% of all future intensification within the Primary Transit Area (TLP 92_3). The proposed development directly supports these targets by directing growth to an area that is already serviced and supported by transit. Furthermore, aside from the proposed land use, the development complies with all other relevant Place Type policies. A more detailed analysis of these matters is provided in Sections 4.2 and 4.3 of this report.

_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.

The London Plan is structured so that the range of uses and intensity that may be permitted directly corresponds to the classification of street on which the property fronts (TLP 919_2). In conformity with Table 10, properties fronting major streets may allow for a broader range of uses than those fronting minor streets (TLP 919_3). In general terms, this framework is intended to balance neighbourhood stability and predictability with broader policy goals such as supportive diverse housing options, establishing an appropriate mix of uses, enhancing affordability, enabling aging in place, and creating vibrant, interesting communities (TLP 919_6). The vision for the Neighbourhoods Place Type is further advanced through forms of intensification that improve our environment, support local businesses, enhance physical and social health, and create dynamic, lively, and engaging places to live (TLP 918_13).

In this context, the subject lands are sufficiently unique to justify permitting stacked townhouse dwellings on a Neighbourhood Street without undermining the integrity of the Place Type policies. In particular, the location of the subject lands within the Wortley Village-Old South HCD is unique as redevelopment opportunities are generally limited by the HDC guidelines. The subject lands, however, are one of the few larger properties within the area that can accommodate intensification while remaining compatible with the surrounding heritage context. On this basis, permitting stacked townhouse dwellings on such a Neighbourhood Street would not impact the integrity of The London Plan's approach to Neighbourhoods planning with regards to use, intensity and form. Moreover, the proposed built form has been intentionally designed to ensure that anticipated impacts of the development are appropriately mitigated, consistent with both the HCD guidelines and applicable policies.

_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.

Policy 1731_ of The London Plan explicitly states that Specific Areas Policies will not be permitted in the absence of distinguishing or unique features of a site that would justify special consideration. It further cautions against adopting such policies where they may establish a precedent for future similar exceptions. This policy ensures that deviations from the planning framework are only permitted in exceptional circumstances where sufficient justification is provided. On this basis, staff are of the opinion that the proposed use and Specific Policy Area are supported by sufficient uniqueness and distinction to warrant a deviation from the Neighbourhoods Place Type use policies without setting a precedent for other properties in the area and across the city.

As above mentioned, the uniqueness of the subject lands arises primarily from its location within the Wortley Village-Old South HCD. The HCD Plan establishes an overall objective to encourage the retention, conservation and adaptation of the district's cultural heritage resources and attributes, rather than their demolition and replacement (3.1.1). The HCD Plan also provides guidance for managing change so that the heritage attributes and cultural heritage values are conserved, maintained and wherever possible, enhanced. As a result, redevelopment opportunities within the HDC are limited and any new development must conform to the HDC guidelines. The subject lands, however, represent an exception within this context as the property is one of the few larger properties within the area capable of accommodating this level of intensification while remaining compatible with the surrounding heritage context. This provides a unique opportunity to introduce appropriately scaled intensification without compromising the integrity of the HCD.

The proposed development includes several design features that warrant special consideration, including the retention and enhancement of the existing on-site cultural heritage resource. The submitted HIA also concludes that, with the implementation of the recommended mitigation measures, the proposed development is generally aligned with the goals, policies, and guidelines of the Wortley Village-Old South HCD. In particular, the proposed location and height of the stacked townhouse dwellings are sympathetic to the HCD guidelines and will be further refined through a future Heritage Alteration Permit (HAP) to ensure minimal impacts on the streetscape and adjacent heritage properties. Additionally, the proposed use provides an appropriate transition in intensity by located the stacked townhouse dwellings adjacent to an existing higher-density residential building to the east, with the units sited next to the building's parking area where impacts are expected to be minimal. The development also offers potential community benefits, such as more attainable and diverse housing options and providing enhanced on-site amenities, further supporting the rationale for policy flexibility in this instance.

_4. The proposed use cannot be reasonably altered to conform to the policies of the place type.

Although the proposed development could be modified to conform with the use policies of the Neighbourhoods Place Type, doing so would result in the loss of half of the proposed units. In accordance with Table 10 of The London Plan, properties fronting a Neighbourhood Street may permit standard townhouse dwellings. As such, a similar built form containing four (4) townhouse units could proceed without requiring an amendment to the Official Plan. However, reducing the scale of the development would also reduce the opportunity to provide additional housing in a well-suited location for intensification. Furthermore, given that the proposed development generally aligns with the goals, policies, and guidelines of the Wortley Village-Old South HCD, staff are of the opinion that the benefit of accommodating additional housing warrants the policy flexibility from the use permissions of the Neighbourhoods Place Type in this instance.

_5. The proposed policy is in the public interest and represents good planning.

Given the abovementioned rationale, staff are of the opinion that the requested amendment is in the public interest and represents good planning. On this basis, staff are recommending the adoption of the requested amendment to introduce a new Specific Policy Area to the Neighbourhoods Place Type.

4.2 Intensity

Within the Neighbourhoods Place Type, properties fronting a Neighbourhood Street are permitted a minimum height of one (1) storey and a maximum height of three (3) storeys (Table 11 – Range of Permitted Heights in the Neighbourhoods Place Type). Both the existing residential building and proposed stacked townhouse dwellings conform to the maximum height permissions. In addition, to provide greater certainty in building height, the applicant has requested a reduction to the maximum height permitted under the Residential R5 (R5-7) Zone, limiting building heights to 10.5 metres whereas 12.0 metres would otherwise be permitted.

The London Plan requires that planning and development applications within existing neighbourhoods articulate the prevailing neighbourhood character and demonstrate how a proposal has been designed to fit within that established context, (TLP 199_). Residential intensification within the Neighbourhoods Place Type is encouraged and may occur through a variety of forms, including additional residential units, converted dwellings, adaptive re-use of non-residential buildings, lot creation, infill development, and redevelopment (TLP 938_). These policies ensure that intensification is compatible with receiving neighbourhoods, which is especially important for properties located within a HCD.

The proposed development constitutes residential intensification, as it involves both the interior conversion of the existing residential building to add additional dwelling units and the development of stacked townhouse dwellings (TLP 939_6). The form and scale of development are appropriate for the subject lands and compatible with the existing and planned neighbourhood and cultural heritage context. The subject lands are of a sufficient size and configuration to accommodate the proposed uses and intensities, ensuring that building heights are sensitive and sympathetic to the surrounding area (TLP 953_). The site layout also provides for the required functional elements, including safe access, adequate parking, outdoor amenity areas and sufficient buffering (e.g., fencing and landscaping). Furthermore, the development supports the efficient use of land and existing municipal services (TLP 953_2, 3).

On this basis, staff are satisfied that the proposed building heights, intensities and transitions conform to the Neighbourhoods Place Type policies of The London Plan.

4.3 Form

It is the intent of The London Plan to plan for neighbourhoods with a diversity and mix of built forms that avoids the broad segregation of different housing types, intensities, and form (TLP 918_2). Thus, residential intensification is fundamentally important to achieve this vision and key directions of The London Plan. Nevertheless, intensification will respect existing neighbourhood contexts and offer a level of certainty, while providing strategic ways to realize our vision for aging in place, diversity of built form, affordability, vibrancy, and the effective use of land in neighbourhoods (TLP 497_).

Pursuant to Policy 953_, the following urban design considerations apply to the Neighbourhoods Place Type and are relevant to this application. Compatibility and fit, from a form perspective, will be evaluated based on factors such as:

- Site layout within 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.

- Character and features of the neighbourhood.
- Height transitions with adjacent development.
- Massing appropriate to the scale of the surrounding neighbourhood.

In addition to the form and residential intensification policies of the Neighbourhoods Place Type, all planning and development applications are required to conform to the City Design policies of The London Plan (TLP 841_1). These policies promote compact and efficient forms of growth, encouraging “inward and upward” development patterns (TLP 7_, 59_2, 66_, 79_). The London Plan directs all planning and development to foster a well-designed build form while ensuring development is designed to fit within its context (TLP 193_1 and 193_2). A medium density-built form, such as stacked townhouse dwellings, supports the efficient use of land and contributes to housing affordability by providing a range of housing options for all Londoners (TLP 55_13).

The proposed development consists of 2.5 storey stacked townhouse dwellings located in the rear yard, screened from the street by the existing building and enhanced landscaping, and the retention of the existing residential building. The retention of the existing building preserves, and where possible provides an opportunity to enhance the existing inviting, active, and comfortable pedestrian streetscape along Marley Place, while providing sufficient space for landscape buffering and servicing for the new development (TLP 936_, 259_). The proposed built form and massing appropriately consider the surrounding land uses and are generally sympathetic in scale with nearby heritage buildings (TLP 953_2). The site design also strategically positions the stacked townhouse dwellings adjacent to an existing higher-density residential building to the east. By locating the new units next to the building’s parking area, the development provides an appropriate transition in intensity and ensures potential impacts on adjacent properties are minimized.

Notwithstanding, while staff agree with the submitted HIA, noting the proposal generally aligns with the goals, policies and guidelines of the Wortley Village-Old South HCD, the application could still result in direct and indirect impacts on the on-site and adjacent protected heritage properties. As such, staff have recommended directions for consideration by the Site Plan Approval Authority to ensure adherence to the mitigation recommendations (found within the Heritage Impact Assessment, TMHC Inc., 2025) to the compatibility of the proposed development with on-site and adjacent cultural heritage resources. Staff also recommended that the applicant collaborate with heritage staff through the Heritage Alteration Permit (HAP) process to establish a building design that is sensitive and compatible to the Wortley Village-old South Heritage Conservation District. Additional measures, including enhanced all season landscaping (with a minimum of 50% native species) and refinements to the rear yard and parking area setbacks are also recommended to further support site functionality, compatibility with the HCD and reduce overall potential impacts.

On this basis, staff are satisfied that the proposed built form and site design conform to the Neighbourhoods Place Type and City Design policies of The London Plan, and that the recommended refinements can be appropriate addressed through the concurrent Site Plan Approval and HAP processes.

4.4 Zoning

The following summarizes the special provisions requested under the Residential R5 Special Provision (R5-7(_)) Zone, as proposed by the applicant and recommended by staff.

Interior Yard Depth

A special provision to permit a minimum interior yard depth of 2.2 metres is proposed by the applicant and is being recommended by staff when the end wall of a unit contains no windows to habitable rooms. The intent of yard regulations is to ensure sufficient space between the buildings and lot line to accommodate all on-site functions while mitigate potential adverse impacts on adjacent properties. An increased setback is also typically required under the zoning regulations for buildings at greater heights and when

windows to habitable rooms are proposed to further mitigate adverse impacts to abutting properties.

In this case, the reduced interior side yard setback is determined to be sufficient for the provision of on-site functions, including space for enhanced all-season vegetative screening around the interior property line to buffer the proposed development from adjacent property. Additionally, the horizontal massing of the stacked townhouse dwellings, while not consistent with the established building proportions in the area, can be mitigated by incorporating certain architectural design elements. Given this, and that no windows to habitable rooms are proposed, staff are satisfied that the reduced interior side yard setback is not anticipated to adversely impact the adjacent property and that mitigation measures can be appropriately incorporated.

Rear Yard Depth and Rear Yard Second Storey Deck

A special provision to permit a minimum rear yard depth of 3.0 metres and a rear yard setback for second storey decks of 1.5 metres is proposed by the applicant and is being recommended by staff. Again, as with the interior side yard depth, staff are of the opinion that the setback is sufficient for the provision of on-site functions, including space for individual amenity space. Additionally, as the proposed building abuts a parking lot, staff have no concerns with the requested rear yard depths.

Building Height

A special provision to permit a maximum height of 10.5 metres is proposed by the applicant and is being recommended by staff. In this case, the applicant is seeking a reduction to the maximum height permitted under the Residential R5 (R5-7) Zone, limiting building heights to 10.5 metres whereas 12.0 metres would otherwise be permitted. Staff are of the opinion that this reduction is appropriate and will further ensuring the protection of the HCD. The reduction in height also further supports the rationale for policy flexibility in this instance by incorporating an additional mitigation measure beyond the standard requirements which is both in the public interest and represents good planning.

Additional Special Provisions

To provide additional certainty that potential impacts of future development of the subject lands will be mitigated, the staff are recommending the following additional special provisions:

- Parking Setback – A minimum parking area setback of 2.0 metres along the south property line is recommended to support enhanced landscaping and mitigate the potential adverse impacts of the parking area on the adjacent property and the greater Wortley Village-Old South HCD.
- Parking Location – As proposed, the first parking space projects beyond the front façade of the existing building, encroaching into the front yard. To further protect the character of the HCD and ensure no parking is provided in the front yard, staff recommend an additional special provision to prohibit front yard parking.

Staff are satisfied that through the implementation of the zoning considerations described above, the subject lands support an appropriate form and intensity of development that is consistent with the PPS and in conformity with The London Plan.

Conclusion

The applicant has requested an amendment to the Official Plan, The London Plan, to add a Specific Policy to the Neighbourhoods Place Type in The London Plan, and to Map 7 – Specific Policy Areas to permit stacked townhouse dwellings. Additionally, the applicant has requested an amendment to Zoning By-law No. Z.-1 to rezone from a Residential R3 (R3-1) Zone to a Residential R5 Special Provision (R5-7(_)) Zone.

Staff are recommending approval of the requested Official Plan and Zoning By-law

amendments with special provisions. The recommended action is consistent with the Provincial Planning Statement, 2024, conforms to The London Plan, and will facilitate development a site within the Built-Area Boundary and the Primary Transit Area with a scale and intensity that can be appropriately accommodated and will contribute to achieving a diverse range and mix of housing options within the area.

Prepared by:	**Michaella Hynes** **Planner, Planning Implementation**
Reviewed by:	**Catherine Maton, 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, Housing and Community Growth**

Copy:
Britt O'Hagan, Manager, Current Development
Mike Corby, Manager, Site Plans
Brent Lambert, Manager, Development Engineering
Travis Macbeth, Manager, Planning Policy (Growth Management)
Huyen Le, Economic Research Analyst

Appendix A – Official Plan Amendment

Bill No. (number to be inserted by Clerk's Office)
2025

By-law No. C.P.-XXXX-

A by-law to amend the Official Plan, The London Plan for the City of London, 2016 relating to 10 Marley Place.

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

1. Amendment No. (to be inserted by Clerk's Office) to the Official Plan, The London Plan for the City of London Planning Area – 2016, as contained in the text attached hereto and forming part of this by-law, is adopted.

2. This Amendment shall come into effect in accordance with subsection 17(27) of the *Planning Act, R.S.O. 1990*, c.P.13.

PASSED in Open Council on January 20, 2026, subject to the provisions of PART VI.1 of the *Municipal Act*, 2001.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – January 20, 2026
Second Reading – January 20, 2026
Third Reading – January 20, 2026

AMENDMENT NO.
to the
OFFICIAL PLAN, THE LONDON PLAN, FOR THE CITY OF LONDON

A. PURPOSE OF THIS AMENDMENT

a. The purpose of this Amendment is to add a policy to the Specific Policies for the Neighbourhoods Place Type and to add the lands described herein to Map 7 – Specific Policy Areas – of the City of London to permit stacked townhouse dwellings.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to lands located at 10 Marley Place in the City of London.

C. BASIS OF THE AMENDMENT

The recommended amendment facilitates the development of 2.5 storey stacked townhouse dwellings containing eight (8) units; and the retention of the existing residential building containing four (4) units. The recommended amendment is consistent with the *Provincial Planning Statement, 2024 (PPS)*, which encourages the regeneration of settlement areas, conservation of cultural heritage, and land use patterns within settlement areas that provide for a range of uses and opportunities for intensification and redevelopment. The recommended amendment conforms to The London Plan, including, but not limited to the evaluation criteria for Specific Policy Areas, Key Directions, City Building policies, Place Type policies, Cultural Heritage policies, and the Our Tools policies. The recommended amendment facilitates development a site within the Built-Area Boundary and the Primary Transit Area with a scale and intensity that can be appropriately accommodated and will contribute to achieving a diverse range and mix of housing options within the area.

D. THE AMENDMENT

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

1. Specific Policies for the Neighbourhoods Place Type of the Official Plan, The London Plan, for the City of London is amended by adding the following:

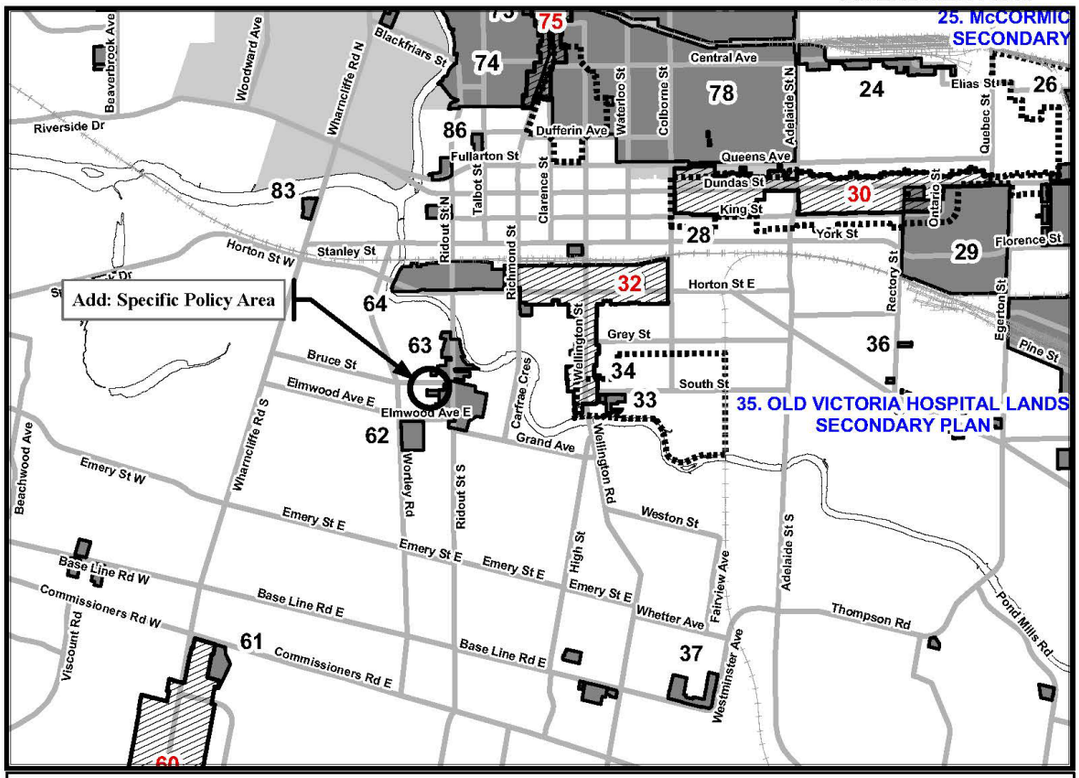
(__) 10 Marley Place

In the Neighbourhoods Place Type at 10 Marley Place, stacked townhouse dwellings may be permitted.

2. Map 7 - Specific Policy Areas, to the Official Plan, The London Plan, for the City of London Planning Area is amended by adding a Specific Policy Area for the lands located at 10 Marley Place in the City of London, as indicated on “Schedule 1” attached hereto.


OFFICIAL PLAN AMENDMENT
No._
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AMENDMENT NO:



LEGEND

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

BASE MAP FEATURES

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

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

SCHEDULE #
TO

OFFICIAL AMENDMENT NO. _____

PREPARED BY: Planning & Development

Scale 1:30,000

0 150 300 600 900 1,200 1,500
Meters

FILE NUMBER: OZ-25129
PLANNER: MH
TECHNICIAN: JI
DATE: 11/25/2025

Document Path: E:\Planning\Projects\p_officialplan\workconsol00\amendments_LondonPlan\OZ-25129\Projects\LondonPlan_Maps_ArcGISPro.aprx

Appendix B – Zoning By-law Amendment

Bill No.(number to be inserted by Clerk's Office)
2025

By-law No. Z.-1-

A by-law to amend By-law No. Z.-1 to rezone an area of land located at 10 Marley Place.

WHEREAS this amendment to the Zoning By-law Z.-1 conforms to the Official Plan;

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

1. Schedule “A” to By-law No. Z.-1 is amended by changing the zoning applicable to lands located at 10 Marley Place, as shown on the attached map **FROM** a Residential R3 (R3-1) Zone **TO** a Residential R5 Special Provision (R5-7(_)) Zone.

2. Section Number 9.4 of the Residential R5 Zone is amended by adding the following Special Provisions:

   R5-7(_) 10 Marley Place

   a. Additional Permitted Uses:

      a. Cluster single detached dwellings

   b. Regulations:

      a. Interior Yard Depth (minimum): 2.2 metres where the end wall of a unit contains no windows to habitable rooms
      b. Rear Yard Depth (minimum): 3.0 metres to the main building, 1.5 metres to second storey decks
      c. Height (maximum): 10.5 metres
      d. Parking Setback (minimum): 2.0 metres
      e. Parking Location: Restricted to the interior side and rear yards

3. This Amendment shall come into effect in accordance with Section 34 of the *Planning Act*, *R.S.O. 1990,* c. P13, either upon the date of the passage of this by-law or as otherwise provided by the said section.

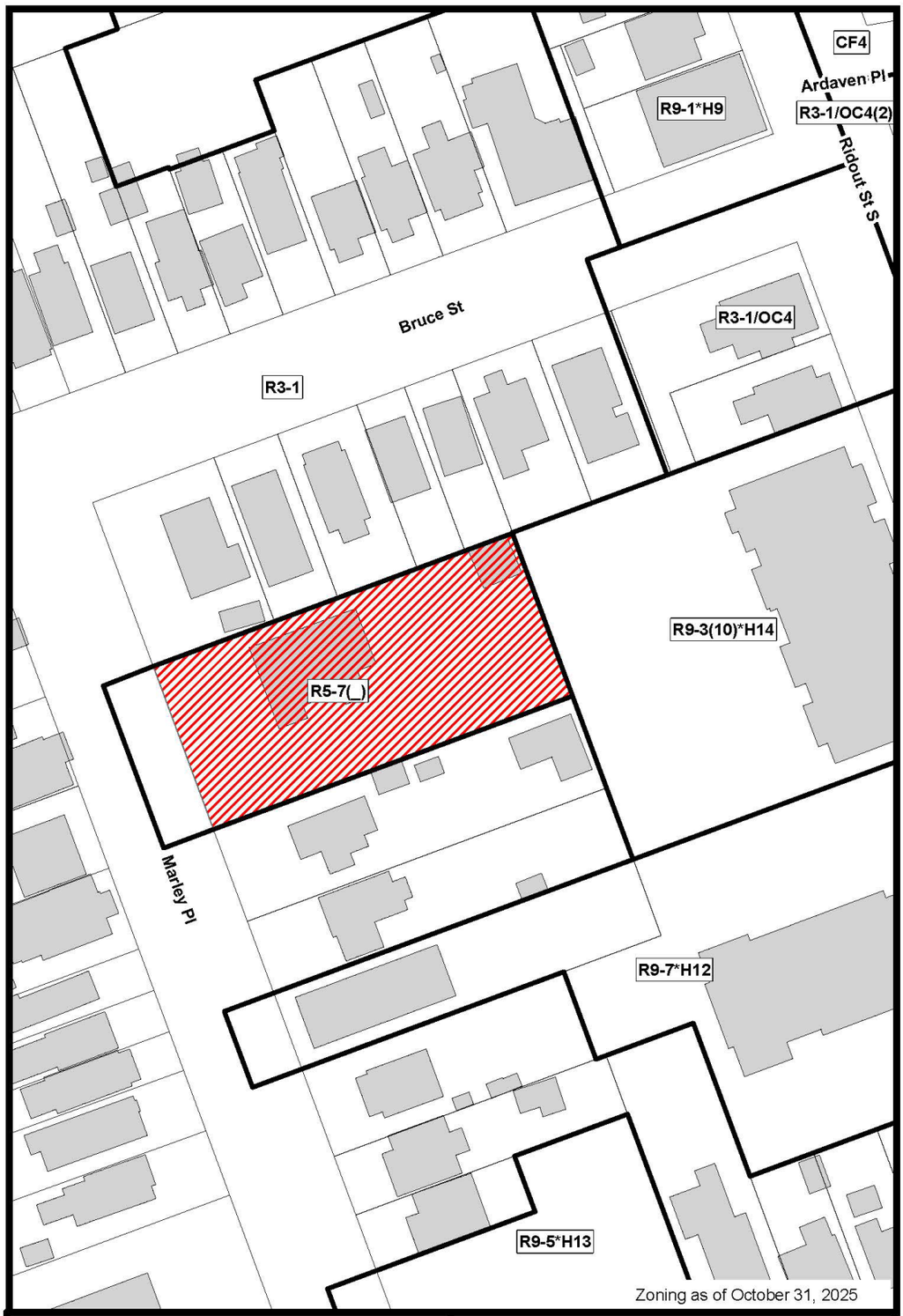
PASSED in Open Council on January 20, 2026, subject to the provisions of PART VI.1 of the *Municipal Act*, 2001.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – January 20, 2026
Second Reading – January 20, 2026
Third Reading – January 20, 2026

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



File Number: OZ-25129
Planner: MH
Date Prepared: 2025/11/25
Technician: JI
By-Law No: Z.-1-

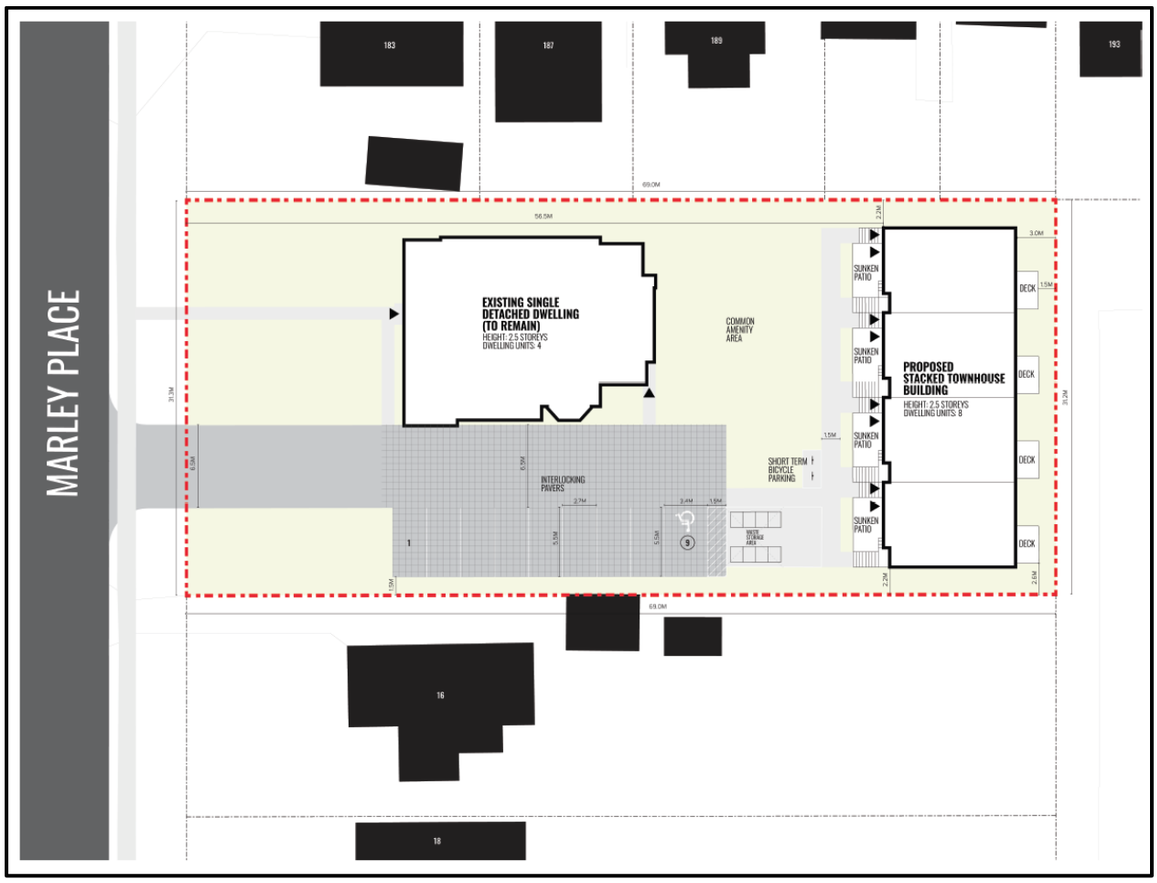
SUBJECT SITE

1:839

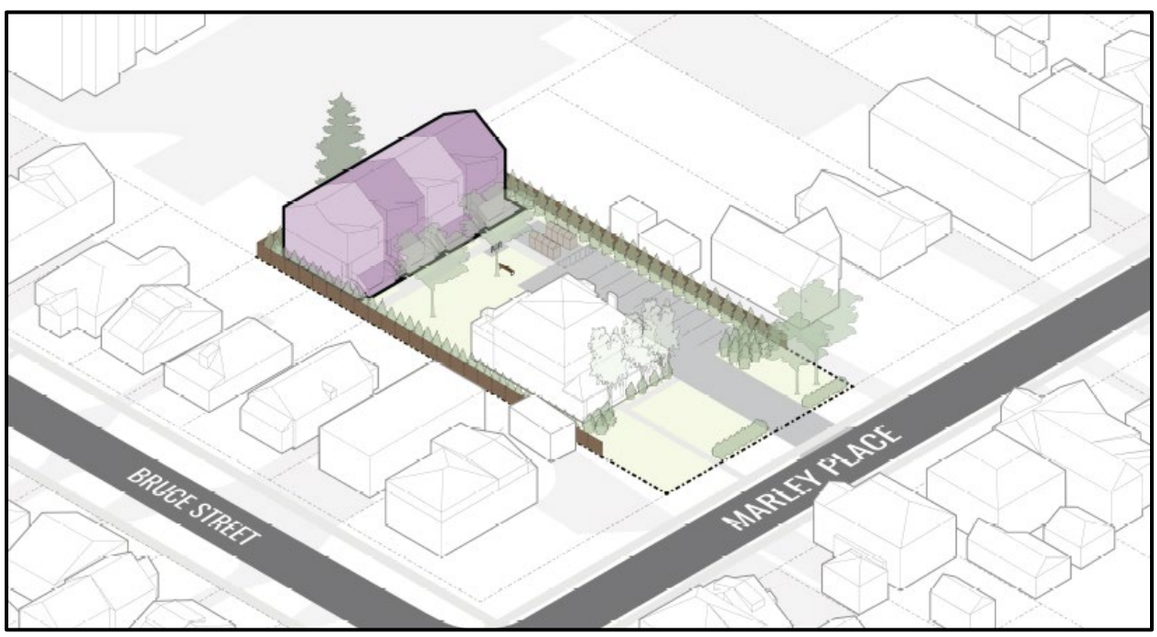
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Appendix B – Additional Plans and Drawings

Conceptual Site Plans



Renderings




MARLEY PLACE
BRUCE STREET

Appendix D – Internal and Agency Comments

Urban Design

Major Issues

- This site is located within the Neighbourhoods Place Type, along a Neighbourhood Street within The London Plan [TLP] which does not contemplate the proposed use (stacked townhouse forms). Given the existing surrounding neighbourhood includes mid-rise forms, Urban Design could be supportive of stacked townhouses in this location, if the following comments are addressed.

Matters for ZBA

- Urban Design was more supportive of the previous site layout, which located the townhouses further away from the rear property line. Increasing the rear yard setback offers more space for landscaping and buffering for the townhouse units from the adjacent parking area to the east, and reduces impacts on existing mature trees.
    - Urban Design recommends the minimum rear yard setback be increased to the previously proposed 6.0m.
- Urban Design recommends the following Special Provisions be included in the proposed R5-7(_) Zone:
    - Maximum height.
    - Minimum interior side yard setbacks of 2.2m (as proposed), when the end wall of a unit contains no windows to habitable rooms.
    - Minimum rear yard setback of 6.0m.
    - Parking is prohibited in the front yard.
- Urban Design recommends the following be added as a Direction to Site Plan:
    - Ensure a robust all-season planting strategy is implemented to effectively screen and buffer this development from the adjacent properties, particularly to the single-detached property to the south.
    - Provide a dedicated pedestrian path of travel from the public sidewalk on Marley Place to the entrances of the proposed townhouse units. Where pedestrians share the drive aisle or parking area with vehicles, use alternative paving materials (e.g., interlocking pavers, etc.) to clearly distinguish the pedestrian zone.

Matters for Site Plan

- Provide adequate setbacks from parking areas and associated drive aisles to the property line to allow space for buffering and landscaping, especially for the property to the south [TLP Policy 253, 282].
    - Increase the setback between the parking area and the southern property line to reduce its potential impacts on the adjacent heritage property. This may require a reduction in the drive aisle width, which Urban Design recommends be reduced to 6.0m to allow for a minimum south interior side yard setback of 2.0m for landscaping and buffering to better mitigate potential adverse impacts arising from the parking area.
- Include weather protection, such as a porch or canopy, above the individual unit entrances to promote wayfinding, pedestrian comfort, and safety.
- Consider incorporating a mix of complimentary architectural styles, materials and colours in the design of individual townhouse units to assist with wayfinding, break-up the massing and to add interest to the overall building design [TLP Policy 301].
- Screen any surface parking areas exposed to the public street with enhanced all-season landscaping [TLP Policy 278].
- Provide adequate buffering and privacy mitigation measures such as enhanced all-season landscaping and fencing along the interior side and rear property lines [TLP Policy 253].

- The design and layout of the site should have regard for and incorporate significant mature trees [TLP Policy 210, 258].
- Provide a full set of dimensioned and labelled elevations for all sides of all proposed buildings, as well as a fully labelled and dimensioned site plan. Further comments may follow upon receipt of the updated drawings.
    - Ensure any grading considerations (e.g., retaining walls, split levels) as well as any proposed fencing between the building and the public street is accurately shown on the elevations.
    - Ensure glazing is labelled with its transparency level (e.g., transparent glazing, spandrel glass, frosted glass, etc.).

Site Plan

Matters for OPA/ZBA

- Special Provisions Requested:
    - To permit an interior side yard setback of 2.2 metres, whereas 4.25 metres is required when the end wall of a unit contains no windows to habitable rooms.
    - To permit a rear yard depth of 3.0 metres, whereas 6.0 metres is the minimum required.
    - To permit a rear yard second storey deck of 3.0 metres, whereas 6.0 metres is the minimum required.

Matters for Site Plan

- Provide a full set of dimensioned elevations, site plan and floor plans in metric (Site Plan Control By-law, Section 1.2.b.).
- Specify if the basement windows will function as an egress window for the proposed basement residential unit (Zoning By-law, Section 4.37.3).
- Confirm the functionality of the waste collection point. Ensure that collection vehicles are not reversing onto the City Street and provide truck turnaround movements on the subject lands (Site Plan Control By-law, Section 10).
- Dimension the provided pedestrian walkways. Delineate pedestrian walkways through the parking lot through raised walkways, painted lines or etched asphalt. Provide a direct pedestrian connection to the city sidewalk from the proposed townhouse units.
- Specify the location of snow storage on the site plan. Ensure the proposed snow storage locations do not impact any existing/proposed landscaping (Site Plan Control By-law, Section 1.5.p).
- Specify the location and details of any proposed fencing on the site plan and landscaped plan.
- Shift the parking lot to ensure the parking space is not in the front yard (parking space #1 is currently in front of the existing single-detached dwelling).

Heritage

Context

- The property at 10 Marley Place is designated under Part V of the Ontario Heritage Act as it is included within the Wortley Village-Old South Heritage Conservation District. Alterations to properties within the Wortley Village-Old South Heritage Conservation District, including the construction of new buildings, requires Heritage Alteration Permit (HAP) approval. Please note, the property owner has received HAP approval for alterations to the existing residential building, however, HAP approval has not yet been obtained for the proposed 2.5 storey stacked townhouse dwellings.
- Heritage staff have received the following reports as a part of the submission for OZ-25129:
    - TMHC Inc., Heritage Impact Assessment, 10 Marley Place, September 26, 2025

- Haruta Archaeology, Stage 1-2 Archaeological Assessment, 10 Marley Place (P1131-0108-2024), December 17, 2024

Comments

- Heritage staff have received and reviewed the Heritage Impact Assessment submitted for OZ-25129. The application seeking approval for the 2.5 storey stacked townhouse dwellings at the rear of the property are generally consistent with the policies and guidelines of the Wortley Village-Old South Heritage Conservation District, however, staff have the following comments on the application:
  - Staff are in agreement with the HIA, noting the proposed development is generally aligned with the goals, policies, and guidelines of the Wortley Village-Old South Heritage Conservation District, however, the application has the potential to result in direct and indirect impacts to the on-site and adjacent protected heritage properties. As a result, the following mitigation recommendations, as recommended in the HIA must be followed:
  - Reduction of Perceived Horizontal Massing Using Design Elements
    - "While the proposed location and height of the Project is sympathetic to the guidelines of the WV-OS HCD, the proposed horizontal massing of the stacked townhouses is not consistent with the established building proportions in the area…It is recommended that the view of the buildings from Marley Place be mitigated by incorporating design elements on the west building façade that serve to visually break up the elevation, thereby softening the impact of the streetscape. Architectural design elements may include a variety of textured materials, projecting and recessed bays, verandahs, tall window openings, pedimented porticos, and a varied roofline."
  - Tree Protection or Replacement
    - "It is recommended that an arborist be consulted to mitigate any construction impacts to the trees and vegetation on the Subject Property, along boundary lines, and on adjacent properties. Tree retention and protection measures should be followed and potential impacts to trees on, or adjacent to, the Subject Property should be monitored and avoided wherever possible. Future detailed design renderings should identify which trees are identified for removal as part of the proposed development. If tree removal cannot be avoided as part of this project, either on the Subject Property or in the Marley Place right-of-way adjacent to the Subject Property, it is recommended that the trees be replaced following the completion of the proposed development with trees of an appropriate size and species. This will ensure consistency in the streetscape.
  - Construction Staging Area Setback and Construction Monitoring
    - "To mitigate potential direct and indirect impacts to the extant house, adjacent heritage properties, and significant heritage attributes like trees, ongoing monitoring of construction activities, particularly those which have the potential to directly impact the extant building, 16 Marley Place, and immediately adjacent properties along Bruce Street must be implemented."
  - Selection of Materials and Architectural Designs that Conform to the WV-OS HCD Plan and Design Guidelines
    - "It is recommended that the designs of the proposed stacked townhouse development be compatible with adjacent houses through the sympathetic use of buildings materials and design. Exterior building materials could include neutral colours of brick, stone (or cast stone), wood, and/or materials such as HardiePlank siding…While the proposed development should not duplicate surrounding heritage structures or be made to appear 'historic', the design should reference the key built features, materials, scale, landscaping, and the proportions of neighbouring heritage

properties, such as 16 Marley Place, to maintain the rhythm of the streetscape and minimize heritage impacts."

- Vegetative Screening to Obscure Horizontal Building Mass and Parking Area
  - "Future site plan designs should include vegetative screening for the parking area and the stacked townhouses at the rear. The proposed setback of the parking area provides an opportunity to plant street-adjacent trees and hedges to serve as screening between the parking and sidewalk. Similar screening should be considered for the southern property line to provide a visual buffer between the Subject Property and the adjacent property at 16 Marley Place.
- Staff agree with the recommendations noted above and will be seeking demonstrations that these mitigation measures have been implemented through the Site Plan process.
- Staff also agree with the conclusions of the HIA that the existing on-site garage is not considered to be a significant cultural heritage resource that contributes to the cultural heritage value of the subject property or the Wortley Village-Old South Heritage Conservation District.

- In addition, heritage staff also have the following comments/recommendations:
  - Heritage staff have concerns with the parking area located adjacent to the property at 16 Marley Place. To mitigate the potential adverse impacts of the parking area on the adjacent property at 16 Marley Place and the Wortley Village-Old South Heritage Conservation District, heritage staff recommend:
    - The driveway and drive aisle be reduced from 6.5m to 6m to allow the parking area to be further setback to a total of 2m, instead of the current 1.5m
    - Board-on-board fencing be required along the north and south property lines to provide further mitigation measures for the adjacent properties
    - Front yard parking be prohibited
    - Vegetative screening of the parking area be undertaken with all-season landscaping to provide an effective screening of the parking area from Marley Place as well as to the adjacent property at 16 Marley Place
    - The driveway accessing the property along the north side of the existing building be closed if the south access is approved and permitted
  - Heritage Alteration Permit approval is required for new buildings within the Wortley Village-Old South Heritage Conservation District. As a new building within a Heritage Conservation District, the HAP for the new townhouses requires consultation with the Community Advisory Committee on Planning, and Council Decision.
  - Heritage staff recommend that through the Site Plan process the applicant work with heritage staff to establish a building design that is compatible with the context of the property, as recognized through the policies and guidelines of the Wortley Village-Old South Heritage Conservation District, and The London Plan.
  - The following policies included within The London Plan must be addressed through the design of the stacked townhouses:
    - 197_ The built form will be designed to have a sense of place and character consistent with the planned vision of the place type, by using such things as topography, street patterns, lotting patterns, streetscapes, public spaces, landscapes, site layout, buildings, materials and cultural heritage.
    - 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. The Our Tools chapter and the Residential Intensification policies in the Neighbourhoods Place Type chapter of this Plan provide further guidance for such proposals
    - 301_ A diversity of materials should be used in the design of buildings to visually break up massing, reduce visual bulk and add interest to the building design.
    - 305_ Where new development is being constructed adjacent to heritage designated properties, building materials should be sympathetic to the materials and architectural style of the heritage property.

Engineering

Planning & Development

- Engineering has no further comments on this application – Approval is recommended. For the applicant's benefit the following comments have been provided and are to be addressed as a future site plan application.

Matters for Site Plan

Wastewater

- The Municipal sanitary outlet for the property is to the fronting 200mm sanitary sewer. City asbuilt drawing #22653 show information pertaining to this sewer.
- There is a 150mm sanitary PDC stubbed near the north lotline ran to behind the sidewalk to service this property according to City record drawing #22653
- The sanitary drainage area plan #22650 shows the property with an allocation of 62 ppl/Ha with a site area of 0.22Ha and allocation of 14 ppl. The site proposed population is 22 people which is over-allocated. However, their is capacity available in the 200mm sanitary to accommodate this intensification.
- SED has no objection to this re-zoning

Water

- Water Engineering does not object to the proposed Official Plan and Zoning By-law amendment, noting the inclusion of holding provisions related to water infrastructure is not required.
- Water for the subject lands is available via the 150mm PVC watermain on Marley Place which is part of the city's low-level pressure system with a hydraulic grade line of 301.8m
- City records show that 10 Marley Place has an existing 25mm copper water service. Owner is to confirm that the existing water service is adequately sized to support the proposed development. If it is found the existing water service cannot adequately supply the proposed development the existing water service is to be removed in accordance with city standards (cut and capped at the main) and a new water service of appropriate size is to be installed to service the property.
- A water servicing report and associated modeling will be required, addressing all domestic demands, fire flows, water quality and the various scenarios outlined in section 7.3.1 of the city's Design Specifications and Requirements Manual (DSRM).
- As part of the site plan application, provide information relating to the proposed ownership arrangement of the various buildings (e.g. are all buildings to be owned by the same entity, or will each building be separately owned).
- Water servicing shall be configured in such a way as to avoid the creation of a regulated drinking water system.
- Water servicing to be in accordance with stacked townhouse standards

Stormwater

- As per section 6.9 of the DSRM, Permanent Private Stormwater Systems (PPS)

are a mandatory part of a regional stormwater servicing strategy for all Medium and High Density Residential site plan developments. A standalone Operation and Maintenance manual document for the proposed SWM system is to be included as part of the system design and submitted to the City for review. This application falls under PPS case 3a.

- As part of a complete development application, the owner will be required to have a professional engineer submit to and have approved by the City Engineer the design of a PPS system, including a Storm/Drainage Servicing report and drawings which should include calculations, recommendations, and details to demonstrate compliance with the below identified SWM criteria and environmental targets:
    - The consultant shall provide/connect to a pdc in accordance with Drainage bylaw (WM-4) and DSRM requirements.
    - As per as-con 22653, there is an existing storm PDC servicing the subject site. The consultant is to confirm the PDC is sized appropriately.
    - As per attached as-con 22649, the site at C=0.60 is tributary to the existing 525mm storm sewer on Marley Place.
    - For proposed development in exceedance of the approved C-value, peak flows shall be managed by onsite SWM control design including, but not limited to, bioswales, infiltration galleries/systems, storage volume calculations, flow restrictor sizing, etc. It is suggested that primarily “clean” roof runoff be directed to infiltration features.
    - Site grading is to safely convey up to the major storm event (100-year event flows factored by 1.3, ref. 2024 DSRM 6.2.3), including control of external drainage areas.
    - 100% of quality and erosion controls are to be provided for the lands to be developed, as per the applicable Subwatershed Study (70% TSS removal, The Cove).
    - A Stormwater Management checklist for Site Plan shall be signed and submitted with the initial application. Please refer to DSRM Section 6.1.5 & 6.12.
- The Owner agrees to promote the implementation of SWM Best Management Practices (BMP's) within the plan to the satisfaction of the City Engineer, including, but not limited to, decreasing impervious areas and Low Impact Development (LID) when possible. Additionally, as part of climate change resiliency objectives the consultant is to use best efforts to maximize the provided site storage, and is encouraged to consider options, such as but not limited to, optimized grading for ponding areas, roof flow control drains, and orifice controls.
- 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 ground water elevation. Please note that the installation of monitoring wells 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.
- Please ensure compliance with OBC requirements, including, but not limited to the following:
- The buildings shall be located, and site graded, so that water will not accumulate at or near the buildings,
- At downspouts, extensions shall be provided to carry rainwater away from the building in a manner that will prevent soil erosion,
- The site shall be graded so that water will not adversely affect adjacent properties or downstream lands.
- Grading and Disposal of Storm, Surface and Wastewater shall be in accordance with Section 12 of the Site Plan Control By-Law (SPCB).
- Storm sewers on private property are regulated by the Ontario Building Code (OBC). Where there are no specific regulations in the OBC, applicable design guidance from Chapter 5 & 6 of the City of London, 2024 Design Specifications

and Requirements Manual (DSRM) shall apply.
- An E&SC for the subject site should be prepared by the owner's consultant as part of a complete site plan application. The plan is to include measures to be used during all phases of construction, should identify all erosion and sediment control measures for the subject site, and be in accordance with City of London and MECP standards and requirements. These measures are to also be identified in the Storm/Drainage Servicing Report. For further information on the requirements of the E&SC Plan, please refer to DSRM Section 10.

Transportation

- How will waste collection occur? Will a waste collection vehicle be entering the site or will the collection be curbside?
- If a waste collection vehicle will be entering the site, truck turn around movements shall be provided and swept path analysis.
- Snow storage shall be labeled on the plans.

Parks Planning

Matters for Site Plan

- Parkland dedication has not been taken for this site. It is to be noted that the applicant, as a condition of site plan approval, will be required to provide parkland dedication in the form of cash in lieu pursuant to By-law CP-25.

Landscape Architecture

Matters for Zoning/Direction to Site Plan

- Provide enhanced all-season vegetative screening around the interior property lines to buffer the proposed development from adjacent properties, and for any portion of the parking that is visible from the street. Refer to The London Plan, Policy 282.

Matters for Site Plan

- The Tree Preservation Plan does not match the updated site plan and proposed rear yard setbacks. Ensure the two plans match and update the Tree Preservation Plan accordingly. The below comments are based on the submitted Tree Preservation Plan. Updated comments will be provided with an updated Tree Preservation Plan.
- A boundary tree (Tree #9) is proposed for removal. The City requires consent from the neighbouring property owners prior to injury or removal of the trees, and prior to the approval of the Tree Preservation Plan and Landscape Plan.
- Increase the tree protection fencing around Trees # 11, 12, 25 to the trees drip lines to ensure there is no risk of injury to those trees located on neighbouring properties. If the tree protection fencing cannot be brought to the drip line, refer to Figure 12.2 in Section 12 of Design Specifications & Requirements Manual for appropriate horizontal tree protection alternatives.
- A landscape plan is required as part of a complete Site Plan Application. The landscape plan must be completed in accordance with the City of London Site Plan Control Bylaw Section 1.6.1, Section 9. The base plan should be the same scale as the site plan, superimposed on top of servicing plan.
    - Further landscape comments will be provided through the Site Plan process.

Ecology

- This is to confirm that there are currently no ecological planning issues related to this property and/or associated study requirements.

Notes

- Avoid tree removal within the active bat roosting period (April 30 – September 1) to reduce potential interactions with Endangered bat species, to avoid contravention of the Endangered Species Act.

Chippewa of the Thames First Nation

- In our screening of your project we have identified no concerns with the proposed Official Plan and Zoning By-law Amendment for 10 Marley Place based on the information that you have presented to us at this time. If there are any substantive changes to the application, please notify this First Nation with an opportunity to review.

UTRCA

- The property located at 10 Marley Pl. in London is not affected by any regulations made pursuant to Section 28 of the Conservation Authorities Act. The UTRCA has no objections to this application, and we have no Section 28 approval requirements.

London Hydro

- London Hydro has no objection to this proposal or possible official plan and/or zoning amendment. However, London Hydro will require a blanket easement.

Imperial Infrastructure

- Please be informed, there is no Imperial infrastructure in the vicinity of this location, and there is no need for further engagement.

Appendix E – Public Comments

Public Comment – Maggie Whalley, ACO Advocacy Committee

Thank you for the opportunity to comment on this development, i.e. the building of 8 stacked townhouses behind an existing house in this London HCD.

This represents an improvement over the previous submission in that now 8 units are contemplated. We are generally in favour of 'infill' where it guarantees the conservation of an existing heritage structure and is compatible with the surrounding district in terms of size and height. We would also support an infill that does not detract in any way from the street view of the original existing structure, and does not incur any changes to that structure.

However we have some concern that it is not compatible with the HCD guidelines whereby the development and the new parking spaces do impact upon the street and surroundings as this not a 'Neighbourhood Connector Street' . As this is an HCD all the contiguous houses, (many of which are smaller and not as high) and those opposite, are cultural heritage resources and will be impacted by affecting 'visual character, streetscapes or public views'.

A further scaling back might be considered.

Public Comment – Carolyn Linsdell

As a resident of Old South, I have concerns regarding the zoning request for 10 Marley Place for the building of 'Stacked Townhouses' at the back of 10 Marley Place.

I understand that there is attention being given to the original home on the property with the plan for 4 apartments - that is wonderful. That home is an example of the heritage in Old South and had fallen into decay over the last years, it is great to hear that the building will be restored and become the home of 4 tenants.

Being that 10 Marley Place is in a heritage area, I do not feel that the request for 'Stacked Townhouses' and an 'at the front parking lot' maintains heritage character.

What about allowing a couple of 'carriage house' style units along the southern edge of the lot with parking in the back.

Leave the high density and multiple story dwellings to a street like Ridout, don't support changing the zoning on a street like Marley Place, in the heart of Old South.

Public Comment – Doris Lester

I wanted to express my concerns with the height and the density of the four plus four townhomes. The parking spaces are very limited, and I think it should just be four single storey unit to not overpower the beautiful heritage aspect of the home you are going to be restoring to the four units. It's precedent setting as someone else expressed their information stated that constructs happen as we know on main arteries like Ridout Street right now, as an example, and so this is a side street and the side lots are what can be developed not at the density that this is speaking about. So, I hope that I can attend the public meeting.

Concerns:

- Height and density
- Insufficient parking
- Use too intense for a short/side street

I could support a reduction to 4 new townhouse units, plus the 4 units in the existing building.

J Public Comment – ill Burke and Ina Smit

I, Jill Burke and Ina Smit, are writing to all addressed above about our concerns regarding the proposed Siv-ik development of heritage property10 Marley Place, London.

We have resided in Old South for a combined 45 years, and love our village. We have seen many development's over these years, some very positive and fitting within Wortley and some not so. Because we are an “extremely” desired area to live in, more and more developer’s have seen this as a “money making” opportunity, not taking into consideration the affect it has on those who live beside the development and those in the surrounding area of Old South.

We are not opposed to infill in our area, but it must conform to the heritage designation of our area, not something with a “2025” design, on a property that was built in 1872. This proposed, ultra modern plan, does not fit in with the street scape of Marley Place.

Our contention of this development is the number of units, height and width proposed with the “stacked townhouses”. The proposed development of “stacked townhouses” is over powering to the neighbouring properties on Marley and Bruce St.(developer is requesting zoning change from Residential R3-1 to Residential R5-7 zoning) Any easements allowed for this development will encroach on properties touching the boundary lines of 10 Marley.

Could this developer not add to the existing heritage house with the same foot print (width and height)? The development of 211 & 213 Wortley Road, is a prime example of tasteful infill in Old South. Put parking for all units behind the addition/add on, to existing heritage house, to copy layout of the existing parking of 89 Ridout.

We live in the "Forest City”, and are concerned with the planned removal of trees at 10 Marley. Why is there a proposal to “remove trees” to install a hard surface parking area, with no indication of replanting vegetation. (399-4) The easements they are asking for will damage existing trees on those properties that touch the lot lines of 10 Marley.

The current notion that infill is necessary seems to be an over zealous agenda when we have the construction of 96 Ridout which will provide 168 units. Our village is unique and a disirable area, we would like it to remain this way. The excessive development of 10 Marley will provide a precedent for development of other larger lots in area.

We are asking for the London Planning, Heritage, and city counsel to take our concerns seriously regarding the proposed developers plans of this “heritage” property.

Public Comment – Dave Kinchlea

Dear Esteemed Members of London City Council and City Staff

I am writing to express my views regarding the requested zoning change for the property located at 10 Marley Place, London. While I fully support the concept of appropriate infill development and the preservation of heritage, the current application raises several significant concerns.

1. Rationale for Zoning Amendment

The developers have presented no compelling public benefit or planning rationale to justify the requested zoning amendment. While maximizing profit may be the developers' goal—a goal I do not inherently fault—it should not be the primary or governing consideration for city council when determining official zone changes.

2. Adherence to Current Zoning Regulations

The current zoning classification has been established based on community planning principles. If the proposed stacked townhomes are not permitted under the existing designation, the developer's proper recourse is to lobby for a comprehensive review and

amendment of the overall zoning regulations for R3-1(the by-law itself), rather than seeking an isolated site-specific change that undermines the established plan.

3. Community Aesthetics and Parking

The proposed design, which makes a large parking lot the most prominent street view element, is orthogonally opposed to established community standards and aesthetic expectations.

The existing zone permits infill development that could be designed to effectively obscure the parking area from the general public view, offering both a more aesthetically pleasing streetscape and better protection for the parked vehicles.

Infill is strongly supported by the community, but it must conform to the community's context and character, not conflict with it.

4. Supporting Heritage Property Development

I strongly support allowing heritage properties to be developed in a way that creates a viable funding model for their long-term preservation. Property owners should be empowered to generate the necessary capital to cover the expensive upkeep of heritage assets, rather than being forced to rely on uncertain external funding sources or public subsidies.

In conclusion, I urge Council to consider the lack of planning justification, the inconsistency with community aesthetics, and the need for developers to adhere to the existing zoning framework when making a decision on this application.

Thank you for your attention to these matters.

Public Comment – Greg Lanctot

Michaella - Planning & Development at City of London,

I am writing to you as a concerned local resident regarding the planning application referenced above, which involves the proposed development at 10 Marley Place, London. While I acknowledge the need for development in our city, I have significant concerns about the current proposal's impact on our community and local infrastructure.

I believe that the current application, as submitted, will have a negative effect on the neighbourhood as well as homeowners at 16 Marley Place.

General Concerns as they pertain to Marley Place/Wortley Village

Wortley Village Heritage Conservation District

- The HCD Plan directs higher-intensity development to designated areas such as Ridout Street, not within the low-rise residential interior. This prevents inappropriate intensification in established neighbourhoods and maintains proper planning principles.
- The R2 and R3 zones within most of the district appropriately reflect existing neighbourhood character, while the R9 zone on Ridout Street supports higher density uses such as apartment buildings along an arterial road. The proposed development would be more suitable in these higher-density areas, as Marley Place is a small residential street not capable of supporting such a project. Maintaining this zoning distinction is essential to preserving the district's character.
- The proposal requires a zoning by-law amendment that contradicts the HCD’s objectives, which discourage new land uses that do not fit the established residential character. It also involves the demolition of a 100-year-old carriage house, contrary to the Plan’s direction to preserve heritage structures, risking erosion of historical fabric and setting an undesirable precedent.

- The proposal's stacked, clustered townhomes at the rear of the lot would negatively impact the streetscape of Marley Place, fundamentally altering neighbourhood character and threatening the integrity of the HCD.
- Residents request that the HCD Plan and Guidelines be respected, as allowing high-density development to encroach upon protected neighbourhoods undermines the purpose of the district. As direct neighbours, there is significant concern about impacts on quality of life, and a smaller-scale, contextually appropriate redevelopment is strongly preferred.

Official Plan – Neighbourhoods

- The London Plan (May 2022) aims to protect and enhance neighbourhoods by strengthening sense of place and identity; new development must contribute to this vision.
- The site and surrounding area are designated Neighbourhoods, and Marley Place is classified as a Neighbourhood Street (not identified on Transportation Schedule "C").
- The Official Plan's vision emphasizes community well-being, quality of life, neighbourhood character, sense of place, and identity (Policy 916_1).
- Stacked townhouses are not permitted under Table 10 – Range of Permitted Uses for the Neighbourhoods Place Type.
- The requested Specific Area Policy (1730_3.4) is inappropriate because:
    - It could create a precedent for similar exceptions in Old South; and
    - The proposed use could already conform to existing policies, making a site-specific policy unnecessary.
- Infill development is permitted only when it fits the existing residential form (Policy 937_).
    - The proposed rear-lot building with a wide horizontal mass does not match the surrounding neighbourhood form.
- The proposed infill does not enhance neighbourhood character, quality, or sustainability (937_).
    - Rear placement of the building, front-yard parking, and removal/damage of trees all negatively impact the neighbourhood.
- The development is not purposeful, sensitive, or compatible with adjacent uses due to building location, reduced yards, excessive massing, and vegetation loss (939_).
- The application lacks sufficient detail to address City Design Policies, including:
    - Sensitivity and compatibility with existing and planned neighbourhood context.
    - Form considerations: site layout, access driveway, landscaping, building location, parking, entrance orientation, setbacks, neighbourhood character, height transitions, and massing.
    - Intensity considerations: ability to accommodate driveways, parking, open space, outdoor amenity areas, buffering, setbacks, and waste storage (953_).

Environment – Old South Tree Canopy

- The City has policies to proactively plan, protect, enhance, and conserve the Urban Forest in a sustainable manner (Policy 389_4); the proposed tree removal and expected damage do not support these goals.
- The City's Strategic Approach includes requirements for tree protection, replacement, and evaluation (Policy 399_4); the proposal provides no strategy for replacement or enhancement.
- The Urban Forest Strategy (adopted June 2014) aims to increase and strengthen the tree canopy; the proposal does not address or respond to this strategy.

Site Plan Control

- I believe that Site Plan Approval is mandatory due to the cumulative total of more than ten units (4 units in the converted house + the 8 units in the proposed

stacked townhouses). The following are my site-specific concerns as outlined in the next section.

Site Specific Concerns as it pertains to 16 Marley Place

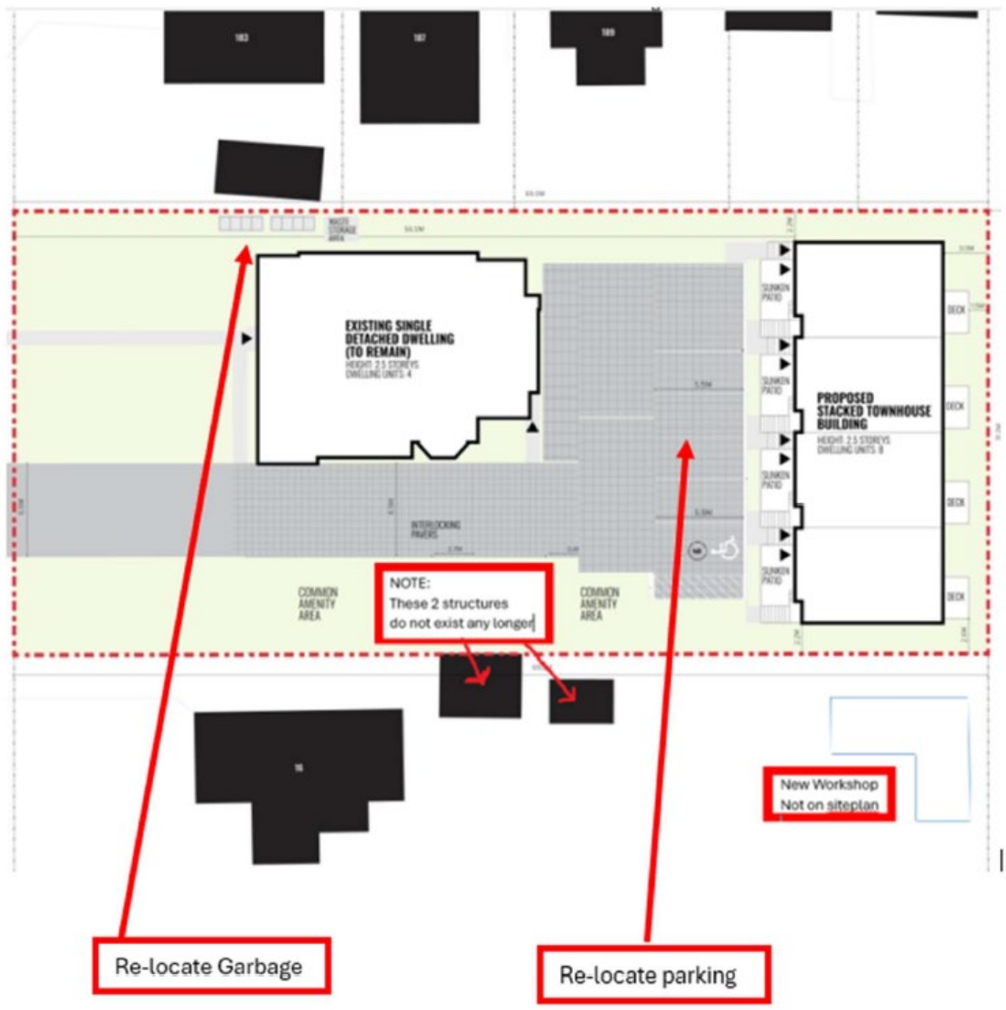
- Onsite parking: All proposed parking stalls currently point directly at my property. I would appreciate some consideration to my privacy and request to have these spots removed or relocated, especially those stalls that point directly at my house. There are 2 structures that are no longer present on my property that would have acted as a buffer to the proposed parking. I'd like to make you aware that the site plan provided by Siv-ik is not up to date as far as my property at 16 Marley Place is concerned. It still references 2 structures that have been removed in my yard (as of November 2024) and does not reference the new structure to the rear of the property. See an updated site plan I have created at the end of this letter. (Ref: Proposed/Updated Site plan of 10 Marley Place)
    - Parking reduction/relocation: To limit the impact to the homeowners of 16 Marley Place, I would like to see a consideration for the following:
        - Reduction to 0.5 stalls per unit, totaling 6 stalls. Running with this you would be able to remove the number of stalls that point directly at my property. (I no longer have the 2 structures to serve as a buffer.)
        - Reposition the stalls away from my property line and align them up against the original building (10 Marley Place), thereby reducing the impact to our household. (I no longer have the 2 structures to serve as a buffer.)
        - Reposition the stalls to line up directly in front of the proposed development at the rear of the property.
        - If vehicle flow is an issue, perhaps create a U-Shaped driveway to allow vehicles to exit down the existing driveway (which I believe is not currently in the proposal to be retained).
- Benefits - Reduces the intrusion of headlights, engines, horns, closing doors and closing trunks that would be inflicted upon our residence due to its close proximity. (I no longer have the 2 structures to serve as a buffer.)
- Benefits - Any combination of these would also increase the green space between 16 and 10 Marley Place.
- Benefits – Reducing the number of parking spots encourages residents to embrace walking, fostering a healthier and more connected community by creating a more pedestrian-friendly environment that prioritizes walkability and reduces reliance on cars.
- Benefits - Reducing/Relocating the parking stalls along the property line would also save one of the tall cedar trees that is slated for removal which is in line with Urban Forest Strategy's policy 399, subsection 4(b)
    - Please refer to Proposed/Updated Site plan of 10 Marley Place that I have drafted to see parking alternatives.
- Garbage location: Garbage proximity to my workshop is not desirable. I spend a considerable amount of time there with the main door open. Please relocate the garbage location to another area on site. For obvious reasons, its current proximity to my newly built workshop is not desired.
- Relocate garbage area: Please relocate the garbage location to another area on the site, such as the northwest section of the property or directly behind 10 Marley Place.
    - Please refer to Proposed/Updated Site plan of 10 Marley Place that I have drafted to see garbage location alternative.
- Snow storage: Where will it be? I would not like to deal with the adverse effects if it is within proximity to the property line.
    - Snow storage plan: Provide a clear plan for snow storage that does not adversely affects areas along the property line.
- Rear setback: Consider reducing the rear setback even more.
    - Adjust setbacks: I invited Siv-ik for an on-site meeting to discuss the application. We talked about the massing of the building and the impact on my residence. I believe there is an initiative to reduce the rear setback of

this structure. I am not sure of its status, but this would be advantageous to 16 Marley Place.

- Building height: Consider reducing the massing from 2.5 storeys to 1.5 storeys.
    - Reduce building height: Lower the building height to 1.5 storeys to be more in character with the surrounding homes along Bruce Street. An example of this would be similar to 352 Ridout Rd South (another recent infill project).
- Stacked Townhome: This design is not congruent with the neighbourhood.
    - Heritage consideration: The proposal seems to lack heritage consideration in its design. Since this proposal would require a demolition permit for the 100-year-old carriage house on the property, I am asking for the design to commemorate that style. At least make the rear structure resemble what it is replacing - a Gambrel Style roof structure with Gambrel Style dormers.
    - Alternate to Stacked Townhome: As stacked townhomes do not exist in the neighbourhood, perhaps consider a different approach. Drop the stacked townhouse plan for a design similar to the renovations at 211/213 Wortley Road and 279 Wortley Road. These 3 addresses added units to the rear of the original building. This approach would be more in line with other successful projects in Old South
- Tree Inventory: Damage to tree roots, regardless of where any construction will occur, will incur.
    - Protect the trees: Excavating for foundation work usually requires a certain amount to over dig to allow crews appropriate access to form foundation walls. I would like to see measures taken to minimize this over dig, especially in those areas that are well treed along abutting property lines. I am specifically concerned about the cluster of trees along the Northeast section of my property as well as the black walnut tree at 89 Ridout St.
- Impact to Street Parking: The proposed development is requesting a new driveway, which will disrupt current parking patterns on Marley Place
    - Maximize Distance between Driveways: Please review and maximize the distance for a parked vehicle on the street, specifically the spot on the road between the driveway for 16 Marley Place and the proposed new driveway entrance for 10 Marley Place. A shorter spot will enable the potential for vehicles to try to "squeeze" into that spot, potentially blocking or reducing our right of way to exit/enter our property (This is currently an ongoing occurrence).
    - Another solution would be to make that "spot" a no parking spot 100% of the time.
- Shrubbery and old fence along 16 Marley Place driveway: This appears to be in the tree protected zone. Reference the Northwest portion of our property at 16 Marely Place.
    - Undisturbed: Looking for confirmation that this area as well as all other areas within the tree protection zone will remain untouched.
- Onsite Lighting Considerations:
    - Light Pollution Reduction: Utilize lighting fixtures that minimize light spill and glare. Ensure that lights are directed downward and shielded to prevent light from spilling into neighbouring properties.
    - Appropriate Lighting Levels: Implement lighting that provides adequate illumination for safety and security without being excessively bright. Consider using lower intensity lights and dimming controls during o□-peak hours.
    - Lighting Curfew: Establish a lighting curfew where non-essential lights are dimmed or turned off during late-night hours to reduce disturbance to nearby residents.
    - Use of Motion Sensors: Incorporate motion sensors for certain areas of the parking lot to ensure that lights are only activated when necessary, reducing unnecessary illumination.
    - Warm Light Spectrum: Option for lighting with a warmer color temperature (e.g., 3000K or lower) to reduce harshness and create a more pleasant environment for neighbours.

- Fence: Currently, there is no fence between the backyards of 16 and 10 Marley Place. With current renovations to the existing structure underway and the pending development at the rear, I would like to retain a certain level of privacy.
    - To the Developer: I currently plan to build a fence, and I invite the developer to share in the material costs for that build. I would undertake the cost of labour to build and install. If you wish to contribute, please contact me directly.

(Ref: Proposed/Updated Site plan of 10 Marley Place)



I believe these adjustments represent a fair compromise that balances the developer's goals with the need to protect the established character of the neighbourhood as well as the interests of the owners of 16 Marley Place.

Public Comment – Wendy Hekker Lanctot

Dear Planner Hynes,

I am writing to express my concerns about the planning application for 10 Marley Place, London. I have lived in Old South for 28 years – 4 as a renter and 24 as a homeowner. I chose to stay because I love the historic charm and small, village-like feel. Over the 28 years, I have witnessed the loss of several heritage properties and I was relieved when the area was finally designated a heritage district in 2014 to protect its character for future generations.

After reviewing Siv-ik's published plans and their heritage impact assessment, I am deeply concerned about the potential impact these proposed developments could have on our community. My specific concerns are as follows:

Wortley Village Old South Heritage Conservation District

Council adopted the Wortley Village-Old South HCD (WV-OS-HCD) September 2014. The HCD requires that the community act as stewards to preserve heritage properties and the community is actively implementing the goals, objectives and principles of the HCD. The subject property at 10 Marley Place is rated “B” in the HCD. Our home at 16 Marley Place is rated “A” in the HCD.

The application does not consider the heritage character of the area for the following reasons:

- The wide horizontal massing of the townhouses is not in keeping with the heritage character of the area with smaller building mass (TMHC Heritage Impact Assessment, pg ii). Siv-ik’s proposal references lands to the east of 10 Marley Place that contain a recently constructed four-storey residential building. It is referenced as a comparison for rationale to support the addition of four stacked townhouses to the rear of the property. This comparison is outside of the HCD and is therefore not a fair comparison. Smaller mass buildings like that of the Ontario Cottage dominate the area.
- The WV-OS-HCD outlines that new developments must respect the existing massing, height and setbacks of surrounding properties (Section 5.7 of the WV-OS-HCD). Approvals for larger massing, higher density buildings will create precedents that developers will use to justify further similar massing and densification. This trend risks eroding the character and the village-like fee of the HCD and shifts existing parameters for property alterations and redevelopment.
- Putting the stacked townhouses at the rear makes the street less welcoming for pedestrians. This goes against the principle that pedestrian comfort and amenities should be prioritized.
- The HCD guidelines emphasize low-rise, low density residential character remains dominant within and adjacent to the HCD (Section 4.1.1 of the WV-OS-HCD). New buildings should blend seamlessly with established streetscapes. Stacked townhomes, by their very nature, bring a bulk and height that disrupts the visual harmony and rhythm of the neighbourhood. Should townhouses at the rear be approved, repurposing and/or replicating that of the existing carriage house/garage would be a more appropriate design for potential walk-in units to minimize the impact on the established streetscapes.
- The HCD emphasizes higher intensity uses or redevelopment opportunities shall be focused outside of the low-rise residential area, that is, Ridout Street (Section 4.1.1 of the WV-OS-HCD. Marley Place is not Ridout Street.
- Parking located in front of the stacked townhouses effectively places parking in the front yard of the project making it the predominant feature on the south part of the lot. The existing building, noted for its austere architecture and dominance on the east side of Marley Place (Brackets & Bargeboards, The Architectural Conservancy of Ontario Inc. 1989), is a significant heritage element. Introducing a parking lot in this location, would diminish the building’s visual importance and negatively contribute to the visual experience of the community. This conflicts with the intent of the Section 3.1.3. of the WV-OS-HCD guidelines.
- There are several mature trees identified to be removed from the property and construction of the building will likely result in the destruction/loss of trees and vegetation on abutting properties. There is no proposal to replace the trees or landscape plan. Mitigation measures proposed will likely have fatal impacts to abutting trees. Trees are identified within the WV-OS HCD as a heritage attribute of the neighbourhood and should not be removed or lost (THMC Heritage Impact Assessment, pg 81)
- There is no indication of the architectural design or materials proposed for the townhouses to understand if they will or will not fit the character of the area.
- Construction activities have potential impact to our home at 16 Marley Place. This is a Class A, delicate, clapboard, single window-paned home and should not be placed at risk. Uncomfortable vibrations have already been felt during the deconstruction of 10 Marley Place down to its structural brick shell. A notable example is when the whole house at 16 Marley Place shook on Dec 1, 2025, when iron beams were dropped on the property. Disregard for damage or potential damage to neighbouring properties is not neighbourly behaviour.

- The WV-OS-HCD guidelines encourage property owners to act as stewards of the building for future owners and users (Section 3.1.2 of the WV-OS-HCD). This implies a responsibility to preserve the integrity of the property and its surroundings and to avoid developments that prioritize short-term gains over long-term heritage conservation. A stacked home development in a backyard (especially one that alters the character of the lot and surrounding area) fails to uphold this stewardship ethic. There is already an existing building (a carriage house/garage) that can be utilized. According to section 3.1.2 of the WV-OC-HCD the demolition of cultural heritage resources and the removal or alteration of heritage attributes is strongly discouraged. Continued approval of variance requests threatens the incentives/sense of pride for those within the district to go out of their way to comply with HCD guidelines including this stewardship ethic. This will eventually lead to the deterioration of the HCD's character and culture.

Official Plan – Neighbourhoods

- The London Plan came into effect May 2022. It sets out the direction to protect and enhance neighbourhoods across the City creating a sense of place and identity. The proposed development needs to contribute to this vision for the City.
- The London Plan designates the site and surrounding area as Neighbourhoods and Marley Place is not shown on the Transportation Schedule "C" therefore is a Neighbourhoods Street.
- Official Plan vision is to create a sense of community well-being and quality of life based on a strong neighbourhood character, sense of place and identity. (916_1.)
- Stacked Townhouses are not permitted on Table 10 Range of Permitted Uses
- The Official Plan Amendment request for a Specific Area Policy 1730_ 3.4. is not appropriate because it will set an argument for a similar exception on other properties in Old South; and the proposed use could conform to the policies of the place type and a site-specific policy is therefore not necessary.
- Infill development is allowed where it fits into the form of residential development. (937_) The proposed form located at the rear of the lot and with a horizontal mass significantly wider than surrounding does not fit the existing neighbourhood form.
- The proposed infill does not add value to neighbourhood existing and planned character, quality and sustainability (937_). Placement of the building at the rear instead of the front of the lot; parking in front of the proposed townhouses;
- removal of onsite trees and damage to neighbouring trees, will have a negative impact on the character, reduce the quality and sustainability of the surrounding area.
- The proposal is not purposeful, sensitive and compatible with the abutting uses based on the building location reduced yards, building mass and loss of vegetation. (939_)
- The application does not fully consider City Design Policies because the details of the design are not provided:
    - Sensitive to; compatible with and fit within the existing and planned neighbourhood context.
    - Compatibility, and fit, from form perspective: site layout; access driveway, landscaping building location and parking; building main entrance orientation; building line and setback from street; character and features of the neighbourhood; height transitions with adjacent development; massing appropriate to the scale of surrounding neighbourhood.
    - Intensity appropriate to accommodate driveways; parking; landscape open space; outdoor amenity; buffering; setbacks and garbage storage areas. (953_)

Zoning R3-1

- The established R3-1 Zoning for this site and surrounding uses to the north/west/south provide a broad range of compatible uses, single detached; semi-detached, duplex, triplex, converted dwellings and fourplex dwellings in

keeping with the character of the neighbourhood. These opportunities do not require a zoning amendment and provide sufficient opportunity for intensification.
- The R3-1 zone allows the severance of the lands; division into two lots with 12m frontage and 430m2 of lot area is allowed in keeping with the lotting pattern of the neighbourhood.
- The proposed R5-7 zone for Stacked Townhouses can be constructed on the property without the requested yard exceptions.
- The application does not address the proposed single unit conversion to four units.

Environment – Tree canopy in Old South

- The city has adopted policies to plan and manage the Urban Forest proactively to protect, enhance and conserve the forest in a sustainable manner (389_4.) The removal and damage to trees will not support this goal.
- The Strategic Approach provides opportunities to protect and enhance the Urban Forest for tree replacement, and evaluation. (399_4.) no strategy for replacement and enhancement is provided.
- The Urban Forest Strategy adopted by Council in June 2014 to enhance tree canopy. The proposal does not consider and respond to the strategy.

Quality of Life

- The area was not designed to accommodate multiple high-density dwellings. Continued rezoning will lead to increased traffic and parking congestion which is already an issue along Marley Place due its proximity to the business area, funeral home, YMCA and apartment buildings along Ridout. We currently experience blocked driveways during well attended funerals and events on the YMCA green space. Individuals visiting The Garthshore park along Marley Place due to insufficient visitor parking. The completion of Tricar's building, The Mayfair, could do the same.
- An increase in density means more residents, more activity and ultimately more noise. More people mean more cars, deliveries, emergency vehicles, car alarms and night conversations echoing down once quiet streets. Our home was not built with high-density living in mind. Thin clapboard walls, single-pane and stained glassed windows as well as outdated insulation do not do much to muffle noise. However, under the WV-OS-HCD, we are expected to maintain our home this way. With more people ordering things online and producing more waste, there will be more frequent pickups, drop-offs and associated hum of engines and clanging of dumpster style bins.
- Reduced green space means more runoff. Our properties at 16 and 18 Marley Place are already surrounded by pavement due to higher density buildings. This causes water to pool in our backyard making it unusable. Additional pavement and structures next door will likely worsen this issue.
- Potential generators associated with the new development will increase noise levels that will penetrate our thin clapboard walls, single-pane and stain glass windows.
- Light pollution. Headlights from vehicles in the proposed south-side parking lot will shine into our windows causing disturbances during evening and nighttime hours.
- Increased garbage will result in more litter in our yards from bin spillover in addition to what we have already experienced from 95 Ridout St, 89 Ridout St and 22 Marley Place.

The effort to preserve this area began in 2006 and, as mentioned, resulted in its official designation as a Heritage Conservation District in 2014. During that time, the community witnessed the unfortunate loss of several historic properties, including those at 83, 85 and 89 Ridout Street (addresses ultimately left out of the HCD due a new Tricar development), 152 Elmwood Ave, 122 Wortley Road and just prior to 2006, 162 Wortley Road. The development at 162 Wortley Road sparked significant community concern, particularly around issues of scale and density at a time when the area lacked

formal heritage protections. Issues included traffic congestion, service access, waste management, scale, massing and design. Now that the area is officially designated as an HCD, we should not have to continue fighting to uphold its integrity. Instead, we should be spending our energy respecting and appreciating the dedication of those who worked to establish this designation by ensuring new proposals respect these principles. This proposal puts the longevity of the WV-OS-HCD into question: Why bother? Wortley Village, Old South is more than a place to live. It is a living story of heritage, character, charm and community spirit. How will this new development contribute to that?

Thank you for considering my concerns. Please add my e-mail address to the mailing list for all future notices of meetings and decisions of Council.

Public Comment – Brock Lanctot

I'm reaching out to you in regard to the proposed redevelopment of 10 Marley Place in Wortley Village. TKFV, the developers, have announced their plans to rezone the property with the intention of turning it into a high-residential zone to accommodate their plans to renovate the existing dwelling and construct 8 stacked townhome units on the rear of the property (Specifically going from an R3 to an R5-7).

I have reviewed their published plans as well as the heritage assessment, and I am concerned with these developments.

10 Marley Place, as it currently stands, is designated under Part V of the Ontario Heritage Act, and rated as a "B" according to the Wortley Village-Old South Heritage Conservation District Plan (WV-OS HCD). Marley Place, running parallel to the Wortley Road commercial hub of Old South, places the street and this property in very close proximity to what has been referred to as "The Heart of Old South", and acts as a sort of buffer zone of low residential Victorian/Edwardian era homes between the main strip of the Village and the ever increasing development of apartment complexes along the Ridout Street thruway.

These contemporary high-residential apartment and condominium complexes have already begun to encroach into the traditionally late 19th century feel of Wortley Village's architecture and character, with developments at 22 Marley Place, 186 Elmwood Avenue, 187 Bruce Street, and most recently 85 Ridout St. The difference between these developments and the new proposal is that they either pre-date the creation of the Old South Heritage Conservation District or do not reside within its boundaries.

The infill project at 10 Marley Place constitutes a continuation of this trend, even though the WV-OS HCD dictates that it is against the interest of the neighbourhood to rezone a property such as this. It is in my interest, and that of some others of Wortley Village, to see this trend halted or mitigated as much as possible in the interest of preserving the heritage value of the current neighbourhood.

I highlight the current designations of 10 Marley Place to bring attention to the heritage value of this property, and the contributions of its value to the character of the Marley Place Streetscape. Redevelopment, mainly with the creation of contemporary style stacked townhomes, would represent a failure to adhere to the guidelines set out in the Ontario Heritage Act, and more specifically in the WV-OS HCD Plan. It dilutes the overall qualitative value of what the Heritage District is trying to conserve.

My main concern rests in how these stacked townhomes would impact the current heritage designations of 10 Marley Place, as well as the precedent this re-zoning action could create. I am thinking of the ramifications well into the future as redevelopment projects continue in the Wortley Village area, and how infill or the additions of apartment units would impact the architectural makeup of Old South Streetscapes, further diluting the importance/existence of having a Heritage District.

I am open to the redevelopment of 10 Marley Place. It is a property that has sat vacant for six years (the annoyance at the immorality of real estate developers sitting on this empty multi-family dwelling during a housing crisis aside), but townhomes? An addition on the rear of the heritage building would be preferable, adding a potential two units to an existing 4. Perhaps the construction of one or two less imposing single-story dwellings at the back of the lot, mimicking a guesthouse or garage? That would be a creative way to add infill development. Anything but the garish width and height of contemporary townhomes looming behind a beautiful yellow brick vernacular style home built almost 150 years ago. To quote the Heritage Assessment, "the proposed horizontal massing of the stacked townhouses does not conform to the established building proportions in the area." (p. ii)

As it stands, the townhomes are an unimaginative design, copied and pasted over from cheap suburban developments, a lazy way to import infill and maximize profiting off of Wortley Village's historic charm while providing no qualitative value in return.

Public Comment – Mary Baarbe

To Whom it May Concern,

I have lived in Wortley Village for much of the last 50 years. I purchased my most recent home in this neighbourhood in 1999. I chose this neighbourhood to raise my children for many reasons. Being able to safely walk, (not be dependent on an adult driving them) to nearly every establishment they needed instilled independence and autonomy. Knowing our many diverse neighbours instilled civic responsibility and ensured personal safety. Over the last 26 years I have watched my own and other children grow up and safely master many skills, riding bicycles, tricycles, play hockey, skateboard, rollerblade, chalk drawing, hopscotch etc. and just as important, greet neighbours and strangers alike, on the beautiful treed streets and sidewalks.

I have several concerns regarding changes at 10 Marley Place. The 8 parking spaces are positioned along the neighbours property. As well as many beautiful trees and shrubs that have been removed along the property line, having vehicles parked and engines running...(yes, people seem to not mind idling their cars for extended periods of time) completely destroy the peace in what was recently a serene backyard. I believe the current plan does not have adequate parking to accommodate the number of dwellings proposed. Many families have more than one vehicle, where is visitor parking, garbage storage? digging foundations close to the property line will damage neighbouring tree roots and destroy the mature trees on neighbouring properties. Many of the advantages of making Wortley Village home will be lost due to even more traffic, basically a parking lot at 10 Marley Place, irresponsible drivers, more street idling and parking. I am not opposed to some infill development but I feel the motives at 10 Marley are primarily more of a private profit making enterprise. I fear the culture of the neighbourhood is a secondary consideration at best.

I am against any changes to variances. They have originally been put in place for good reasons. Any building on 10 Marley needs to adhere to the current bylaws.

I hope our unique neighbourhood can remain a safe, quiet and peaceful child and pedestrian friendly, well cared for place.

Public Comment – Chris McKaskell

We have lived nearby since 2012 and earlier nearby on Craig Street since 2003. We have loved living in Wortley Village for over twenty years and have enjoyed watching the slow steady changes which have occurred along Wortley, and on the adjoining neighbourhood streets – including many of the edgy new single family builds which sprung up suddenly around 2014 driven by builders and developers hoping to beat the neighbourhood’s 2015 designation as Wortley Village-Old South Heritage Conservation District.

To my eye, while the stark aesthetic of these suddenly built homes of 2014 origin may be in visual opposition to the older, surrounding ones of other opportunistic building moments (think late 19C, and post wars population boom), they too add texture to the streetscape. If they last they may even, one day, be appreciated.

Concerning number 10 Marley Place, I have several concerns regarding the proposed development:

- The wide, tall horizontal massing does not fit the visual streetscape. I have been made aware by the developer's planning consultant that they could construct a much taller, more imposing structure, but really anything more than a story and a half will look imposing even placed at the back of the property.
- The proposed parking lot will be a prominent feature of the new streetscape and replaces what were once beautiful gardens and a park-like setting – possibly the last non-public open green space in the neighbourhood and a habitat for urban wildlife. On that note, the open space has also been a reliable hunting ground for the cherished Red-Tailed Hawks which nest atop the Normal School every year. Between this development and the new tower being raised on Ridout Street their habitat will shrink.
- Amending the official plan to allow stacked townhouses, because more units are more profitable for the developer, will open the way for other developers to enter the market by referencing this amendment to argue for their own projects thus changing the neighbourhood character and subsequent quality of life to its inhabitants. I personally know two people who are eagerly waiting to see whether stacked townhouses are allowed on this site as it will inform their own development plans.

Further, while it is a relief to see the existing structure finally being worked on, having sat derelict for many years, the approach to renovating a heritage building the developer has taken belies a profound lack of knowledge about working on heritage structures:

- The roof was torn off with little sensitivity to existing masonry and subsequent, unnecessary damage to the top several courses of buff brick can be seen from the street.
- The entire back of the house has been removed – masonry included which seems to contradict normal heritage construction practices.
- No effort has been made to protect the internal structure from winter weather or freezing precipitation setting a potential issue with freeze/thaw cycles which can lead to masonry failure as well as mold issues once the space is finally closed in.
- Following demolition there has been no indication that crews are rushing to close in or protect the structure from weather damage as we head into what is expected to be a harsher winter than we've recently experienced.

Having experience working on heritage structures I could go on, but my point is the developer appears also to be working at odds with the spirit of heritage conservation in an actual Heritage Conservation District.

This demonstrated lack of reasonable care should raise red flags for council.

Marley Place is a Neighbourhoods Street and acts as a transition or buffer between the intensified residential density of Ridout Street and the small shop commercial nature of Wortley Road. By allowing a developer to make unmitigated changes to the density and streetscape one also erodes the buffering role of this important area.

I am in favour of infill, increased densification, and the creation of affordable housing; and I am in favour of allowing heritage appropriate story and a half townhouses on this site, but I and other constituents would hate to see another event like the unfortunate and ill-conceived local building boom mentioned above. Developers are good at marshalling their efforts when an opportunity presents itself. I humbly ask Council to reject the current proposal.

Thank you for taking the time to read this letter and hear my concerns. I trust city staff will make the best recommendations possible and that council will make a fair decision in this matter.

Public Comment – Maria Jansen

Thank you for the opportunity to express my concerns regarding the Planning Application for 10 Marley Place.

I have lived nearby for 15 years. I cherish this neighbourhood for its historical properties, community and sense of belonging. I am in favour of repurposing existing, beautiful heritage homes for the purpose of infill. We need affordable homes. However, infill must be done in a way that preserves the neighbourhood. My main concern is with respect to how the proposed stacked townhouses would impact the current heritage streetscape of 10 Marley Place, as well as the precedent the requested re-zoning could create for other larger properties within the Wortley Village-Old South Heritage Conservation District.

The proposed development does not respect the heritage character of the area. Its wide horizontal massing contrasts with the smaller-scale buildings typical of the neighbourhood such as the Ontario Cottage. Parking positioned on the south side of the existing building (well, to date, only a shell of 3 brick walls remain without a roof) will draw attention away from the beautiful yellow brick vernacular style home (which will hopefully be rebuilt to its original beauty). Loss of mature trees and lack of a landscaping or plan for replacement will further impact the area's established character. It is my understanding that loss of trees goes against city strategies for sustainability and canopy enhancement.

The London Plan emphasizes protecting neighbourhood identify, enhancing quality of life and ensuring compatibility with existing properties. Stacked townhouses are not permitted under the current designation, and the requested site-specific amendment risks setting a precedent for similar exceptions in Old South. I'm concerned that the addition of a total of 12 units will add to the congestion already experienced along Marley Place as we are sandwiched between the business area and an increasingly busy section along Ridout. Congestion increases noise and traffic irritation. Precedent setting will only make this worse and ultimately negatively impact quality of life as opposed to enhancing it. If the addition of 8 stacked townhouse units are approved, they should be walk-in units to encourage this walkable community and green living. Larger, high-end units will only attract residents with cars and will not contribute to the City's need for affordable housing. There are plenty of high-end units available for rent and purchase within the area that remain vacant. For example, 89 Ridout Street and 49 Ridout Street. We need affordable housing, not more high-end units so that developers can make a profit. That is prioritizing short-term gains over long-term goals and is not responsible planning. To reiterate, introducing an R5-7 zone for stacked townhouses is a dangerous precedent.

Overall, the application is neither purposeful nor compatible, and its impacts on heritage, vegetation, and community well-being are significant.

I am asking you, as the planner for this project, to consider the serious impacts this development will have on one of Canada's best places to live as you make your recommendations to Council.

Public Comment – Neil Shipley

I am writing you to share my opposition to the proposed development at 10 Marley Place, specifically the Specific Policy Amendment and Zoning By-law Amendment.

I am not against infill, but there are several valid reasons to reject the proposal as is. I expect you're hearing them from neighbours like me. I recently attended a specially convened OSCO meeting with a full room of approximately 40 neighbours discussing

these concerns. I believe this is only a small subset of those concerned; those able and willing to attend on very short notice (1 week).

Concerns such as:

- Stacked townhomes are already permitted in nearby areas, and not Marley Place.
    - There is therefore no need to build stacked town homes here.
    - There are other examples, one I know has been shared by William Pol, of site plans which allow for infill under current zoning. There are similar examples of this concept already in place in Wortley.
- Insufficient regard for Old South Heritage because the wide massing of the building; location at the rear of the lot; parking effectively in the front yard; removal of mature trees and absence of architectural details on the building façade.
    - This is particularly noteworthy given the spectacular, meticulously maintained home at 16 Marley. I believe 16 Marley, and the family that owns it, are the best possible examples of what we want Heritage in Wortley to be. This is obvious when looking at the home.
- The site design is not sensitive to the neighbourhood character because setbacks are reduced; the large parking area is visible from the street; the building setback from the street discourages pedestrian and streetscape amenity.

In conclusion, I ask that you reject the Specific Policy Amendment and Zoning by-law Amendment being request. There are valid options for the developer to complete an infill project without amendments, while maintaining a healthy business.

Public Comment – Alex Shipley

I live on Marley Place and I'm writing to share my opposition to the proposed development at 10 Marley Place, including the Specific Policy Amendment and Zoning By-law Amendment.

I'm not against infill, but this proposal raises several concerns that many neighbours have been discussing. Stacked townhomes aren't currently allowed on Marley Place, and there's no need to introduce them here, especially when there are infill options that work within the current zoning, as shown in nearby examples. The design also shows limited regard for Old South's heritage—its wide massing, rear-lot placement, front-yard parking, removal of mature trees, and lack of architectural detail feel out of character for the neighbourhood. This is especially striking when compared to the beautifully maintained home at 16 Marley, which reflects exactly the kind of heritage character we want to preserve.

In addition, the reduced setbacks, large and visible parking area, and the overall site layout don't fit the existing streetscape or neighbourhood feel. Approving a Specific Policy for this project could also set an argument for similar exceptions in the future.

I respectfully ask that you reject the requested amendments. The developer has viable options to move forward without altering the existing zoning.

Public Comment – Brenda Shipley

I understand that there is an application to amend the official plan & zoning by-law relating to the above-mentioned property. I have concerns about these proposed changes. I was born and raised in London and although I do not live in close proximity to this property, as a lifetime Londoner, I am opposed to the proposed development as presented.

I do not oppose infill, however, I do reject the plans offered for many reasons including the highly insufficient regard for the Old South Heritage. The proposed horizontal massing of the stacked townhouses does not conform to the current building proportions in the area. The loss of the beautiful mature trees is devastating and the

parking effectively in the front yard is unacceptable. The overall look is not in line with the expectations and charm of the neighbourhood. It is imperative to upkeep the integrity of the surrounding homes.

Also, to have the extra noise, traffic, and congestion and all that goes with this type of development for the financial benefit of one individual/corporation, is unacceptable to me. There are other options for development without amendments to the current plan and by-laws. This part of the city has always been a gem of a neighbourhood and one to be proud of. Let's keep it that way and not have the integrity of the neighbourhood compromised by developments such as this one.

Public Comment – Mike Dalglish

Please review the application for the Zoning By-law Amendment with caution. The proposed development should be reduced in scope. The emphasis today on infill will produce some developments that a few years later will look as mistakes. This is one of those developments. At the very least a reduction in the number (8) of stacked units should be a reasonable compromise. Take please some extra time to consider the site and the proposal ….Infill doesn't trump common sense.

Public Comment – Dave Vermue

Marley Place is a rather unique three block stretch of streetscape that offers a full range of housing representing the 19th, 20th and 21st century construction. Marley Place is one block from the centre of the Wortley Village business district and is a quiet neighbourhood that often sees more dogs walking by, (along with their owners) than cars on some early and late hours of the day. Marley Place also is the easterly boundary of the "Heart of Wortley Village, The city block that contains the 1889 Normal School building and open green space.

Marley Place is entirely within the Wortley Village - Old South Designated Heritage Conservation District since 2014/2015.

The 1872 built house at #10 Marley Place was purchased and has met the City of London application to convert the existing 19th century yellow brick home to four units. This reinvestment will save the 1872 structure and create space for new neighbours to add to Wortley Village community. Shockingly it looks like severe damage has occurred to the main heritage structure in the conversion during the last week of November 2025, with the roof removed, a chimney and several courses of brickwork damaged and removed. This needs to be followed up by the Heritage Planners ASAP.

The owner says that the current lot of 103 x 226 feet is "underused" and wishes to intensify the density of units on the property by proposing a 8 stacked townhouse units at the rear of the property, four across with a lower and upper townhouse; and additionally is asking to be allowed to build the stacked townhouses upto 2.5 stories or 35 feet (10.5 meters) in hight. This proposals would require variances to be granted by the City of London

Stacked townhouses are not permitted in the current neighbourhood zoning of Marley Place as a neighbourhood street.

Some infill is reasonable, the current proposal is an overreach of density and will be detrimental to their properties and their daily community experience - 12 units is too intense and the stacked townhouse are too high for that piece of property and the neighbourhood.

Any current trees and flora would be eliminated with construction and the amount of green space around the current building with be greatly reduced with the stacked townhouse footprint along with the new parking lot containing nine parking spaces.

Yes some new proposed plantings and landscaping will be introduced, yet I fail see accommodation of enough space to mange snow plowing for the winter months nor are

details provided for water management with the addition of the hard surface areas as proposed.

The proposed nine space parking area would few feet from the city sidewalk will be the most visible detraction to the Marley Place streetscape as will the 24 hour parking area lighting that would be visible.

Adjacent neighbours on Bruce Street, having much shallower lot sizes of only 103 feet in depth, would have a 35 foot wall blocking the majority of the sun exposure likely threatening their own trees and garden health and overall backyard enjoyment.

The architecturally significant Grade ‘A’ house at #16 Marley Place would be severely impacted in term of noise, traffic, light pollution, including the disruption of tree roots impacting the health of decades of over a dozen old trees.

As for creating new housing, yes this would add new units, however, these units would be likely to be valued similar to the units at the four storey units 89 Rideout Street - as a estimate perhaps $400 000 to $850 000 range per unit if put onto the current 2025 housing market. Middle to high income infill, not affordable to lower income tenants.

My opinion that this proposal as presented is an overreach of the existing land footprint and that stacked townhouses do not belong on this property, nor does the creation of a nine car parking lot adjacent to the city side walk.

I cannot support this proposal at its current design and density. I would suggest the owner to produce an additional four unit home similar in design and scale to #21 Marley Place that was and excellent Heritage sensitive new construction added to the Marley Place in 2018. Any new parking should be designed be at the rear of #10 Marley Place.

Public Comment – Michelle Collins

I am writing to you to express my strong opposition to the re-zoning application (OZ - 255129) at the site of 10 Marley Place, which shares a city boundary line with my own property. My name is Michelle Collins, and I am the owner and resident in Wortley Village - Old South neighbourhood. I have lived at this address for the past 23 years, and in the neighbourhood for 25 years. Our neighbourhood is known for its heritage charm, reflected in the many historic residences found within the neighbourhood. We value our trees, green spaces, and walkable streets that all contribute to helping make the area a desirable place to live. The “main street” section of Worley Road between Elmwood Avenue and Craig Street, not only provides amenities including a number of unique boutiques, cafes, and restaurants for residents, but also attracts many visitors from other parts of London and beyond. We have a strong sense of community, with several events such as the long running “Gathering on the Green” in June, the Jazz and Blues festival in August, and both Halloween and Christmas in the Village events providing community connections and a strong sense of identity. These events are possible due to the commitment of Old South Community Organisation (OSCO) and the many residents of Wortley Village willingly volunteering their time and efforts to make these event possible. Collective contributions from numerous residents, the heritage atr adds to the attraction of our neighbourhood and makes it one of the best in London.

The zoning amendment application for 10 Marley Place, does not fit within the heritage attributes and landscape that defines Wortley Village. The rezoning application would have numerous negative impacts on my property and my neighbour at 191 ½ Bruce Street, as well as many detrimental effects on the other heritage designated neighbouring properties close to the site. The two properties at 191 and 191½ Bruce Street are the most impacted of all adjoining boundary residences in relation to the position of the stacked townhouse design and setbacks in the rezoning application. These residences are one storey, and one-one-half-storey in height respectively. We are situated on the north boundary of the development proposal.

Section 1663.1 of the London Plan indicates that minor zoning variances should not detract from the character or amenity of nearby residences.

Impacts of a reduced setback, height and massing difference in relation to the size and scale of our properties are considerable and the proposal would negatively impact the enjoyment and use of the backyard gardens in numerous ways. Negative impacts include:

- Overbearing presence in relation to our houses. The wall of the proposal design facing the rear yards of these properties is to be a solid brick wall. This does not conform to any planning policies outlined in the London Plan or the Wortley Village-Old South Heritage Conservation District Plan as fitting into residential design and conformity.
- This wall would become the dominant and oppressive feature of our rear garden area impacting enjoyment and use on our own properties as a relaxing outdoor feature within our own space.
- Impact of views for the rear facing windows of the residence at 191 ½ Bruce Street.
- The wall will reduce sunlight for existing garden space and vegetation in the rear yards.
- Overshadow and impose on an existing garden seating area located at the rear of 191 Bruce Street.
- Severely impact the viability and likely lead to the death of an old growth, distinct tree that is approximately 150 years old. The tree is in the rear garden of my property - 191 Bruce Street. Both the London Plan, the WV-OS HCD, and other city policies such as Urban Foresty Strategy outline the important heritage contributions trees and green space make to the Forest City.
- Intensity of sound reflection and vibrations from vehicle noise, especially the city transit bus along Bruce Street being reflected off a solid brick wall.
- Reduce property values as the current view is of surrounding trees and vegetation in a heritage neighbourhood not a brick wall.

Supporting documents for the site proposal included a tree assessment and protection plan from a certified arborist, and a Heritage Assessment Report. Both documents are supposed to contain information that is an accurate evaluation of site conditions and the impact on adjoining properties.

- •The heritage assessment report has made no reference to the Bruce Street properties under “Description of Proposed Development”. Given the neighbouring properties on the north boundary are the closest to the proposal site, this seems like relevant contextual information that has been omitted.
- The tree protection plan diagram for the tree at the rear of 191 Bruce Street (#13 in the report) shows only half of the full critical root zone - interior critical root zone (ICRZ). The ICRZ of a tree represents the most vital area for the stability and survival of the tree. The tree protection plan is not an accurate representation of appropriate tree preservation as excavation is within this ICRZ. Additionally, the tree protective barrier zone is not large enough to provide adequate protection.

The re-zoning development proposal not only negatively impacts my own property. It also does not meet the needs of the surrounding neighbourhood and community of Wortley Village - Old South. The proposal for a rezoning amendment

- Does not meet the requirements to implement the use of section 1730 - Specific Sites of the London Plan to justify such a development. Requirements of the London Plan planning policy, the Wortley Village Heritage District Conservation Plan, and the Urban Forestry Strategy are not met in the proposal.

Section 1730 of the London Plan – site specific policy conditions the application has not effectively met include:

1. **The proposal does not meet all other policies of the plan beyond those that the specific policy identifies.** The London Plan policies and the Wortley Village Old South Heritage Conservation District Plan (WV-OS HCD)

- The rezoning application proposal for new development is not designed to respond to the context of existing and planed character of the surrounding area. (252_) The site is within a heritage designated neighbourhood with the WV-OS HCD plan being part of the planning requirements (594_).
- The proposal does not conform with the WV-OS HCD plan to ensure that the low rise, low density residential character remains dominant within and adjacent to the HCD. Design concepts presented are limited, vague, and are incompatible in massing, width, design features, and setback allowances from property boundaries typical of resident homes in the area. There is no indication of the architectural design or materials proposed for the townhouses to understand if they will or will not fit the character of the neighbourhood.
- The site layout is not designed in a way to minimize and mitigate impacts on adjacent properties (253_). Placement of the building at the rear instead of the front of the lot impacts the smaller scale residences of 189 – 193 Bruce Street which share a boundary. The removal of onsite trees and damage to neighbouring trees onMarley Place and Bruce Street will have a negative impact on landscape features that defined the character of the neighbourhood and reduce the quality and sustainability of the surrounding area.
- The site layout, and the corresponding building design shows little regard for the topography of the site (254_), or as to how the layout and grading retains and incorporates desirable trees (258_).
- There are several mature trees scheduled for removal from the property and construction of the building will likely result in the destruction/loss of trees and vegetation on abutting properties. There is no clear proposal to replace the trees or landscape plan. Mitigation measures proposed will likely have fatal impacts to abutting trees. The PPS states that mitigative measures or alternative development approaches may be necessary to ensure that the heritage attributes are not affected by adjacent development.
- Design measures relating to building height, scale and massing that should be used to provide a transition between development of significantly different intensities, considering the existing and planned context are not meet by the design(298_). The site is on Marley Place and designated as a neighbourhood street. 10 Marley Place is not close to Ridout Street South. The site design is not a good transition in height or mass with surrounding properties in the heritage district neighbourhood. A transitional element between the high-density zoning along the main arterial road of Ridout Street South is unnecessary.

2. **The proposal use cannot reasonably be altered to conform to the policies of the place type**

- The R3-1 zoning for this site and the heritage district neighbourhood provide a broad range of compatible uses, single detached; semi-detached, duplex, triplex, converted dwellings and fourplex dwellings.
- The multiple opportunities to utilize land for intensification within an existing neighbourhood and zoning in the area is meet through these options.
- The site has an existing house on the lot that is being preserved and integrated into the development. Stacked townhouses are not permitted as the design is not complimentary to either the existing heritage house and the use of land within the R3-1 zone. The existing R3-1 is appropriate.
- The size of the lot allows for multiple layout options that fit in context to the existing surroundings. The proposal and site plan location constitutes poor planning design and layout. A design without violating boundary setbacks is possible and would be more suitable, match existing properties, and comply with the policies in the WV-OS HCD plan.
- A more fitting design plan to utilize the lot efficiently would allow for parking to move towards the rear of the site rather than places parking so close to the front south yard and streetscape of Marley Place. Side-front parking on the south boundary negatively impacts the heritage class A property at 16 Marley Place.

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

- The proposal is not purposeful, sensitive or compatible with the abutting uses based on the building location reduced yards, building mass and loss of vegetation. (939_) The design negatively impacts the rear yards of 191 and 191

½ Bruce Street, the property of 16 Marley Place along the south boundary, and the properties of 189 and 193 Bruce Street to some degree.

- The proposed infill does not add value to neighbourhood existing and planned character, nor to quality and sustainability (937_). The city has policies to plan and manage the Urban Forest proactively to protect, enhance and conserve the forest in a sustainable manner (389_4.) The removal and damage to trees will not support this goal.
- Placement of the building at the rear instead of the front of the lot; parking in front of the proposed townhouses; removal of onsite trees and damage to neighbouring trees, will have a negative impact on the character of the neighbourhood and surrounding streets. Wortley Village is well known for its tree cover and walkability within our tree dense neighbourhood.
- The design does not meet the accessibility needs of many community members. A proposal that meets the needs of accessibility would be a more suitable fit for the use of the site. The building design requires stair access to units on all levels. A design build at ground level with fewer stairs would allow accessibility needs for a wider range of community members. Seniors looking to downsize could stay in their own residential neighbourhoods. This would align with the goals of the Ontario Health at home objectives and the neighbourhood policy plan. (918_4)
- The overall objectives of intensification in the London Plan and provincial policies are already being meet in the area with the construction for the high-intensity development at 100 Ridout Street South underway.
- Existing residential high and medium-density properties along Ridout Street South and Grand Avenue currently have suites, condo units, and townhouses advertised as being available to rent or purchase to own, meeting housing needs.
- The mass horizontal form of the design - 26.8m (88ft) along the east boundary of the site - 31.4m (103ft) will essentially closes off this boundary with the adjacent parking lot of 89 Ridout Street South. This would create an additional hardscape feature close to two existing ones, intensifying heat and adding to the urban heat island effect in London. It also reduces air flow corridors for humidity in this area. This does not align with mitigation strategies the city has for climate change.

4. **The proposed use is sufficiently unique and distinctive that it does not establish an argument for a similar exception on other properties in the area**

- The Official Plan Amendment request for a Specific Area Policy 1730_ 3.4. is not appropriate because it will set an argument for a similar exception on other properties in Old South. The proposed use could conform to the policies of the place type. A site-specific policy is therefore not necessary.
- The official plan vision is to create a sense of community well-being and quality of life based on a strong neighbourhood character, sense of place and identity.(916_1) The proposal offers no unique or defining features as to how it would meet this objective. The design looks like any other new build, multi use, residential building. It could be situated in numerous neighbourhoods in London. It does not conform to existing massing, setbacks or landscape features that help define the neighbourhood of Wortley Village.
- The site design is not sufficiently unique or different from what already exists. There are numerous similar mix -use buildings along the main arterial road of Ridout Street South and Grand Avenue in Old South. These areas cater to infill development that matches the proposal.
- Infill development is allowed where it fits into the form of residential development. (937_) The proposed form located at the rear of the lot, and a horizontal mass significantly wider than surrounding houses does not fit the existing neighbourhood form. The R3-1 zoning allows for appropriate infill to meet the needs of a growing city while still honouring the policies set out in the London Plan and WV-OS HDC plan.

5. **The proposed policy does not have an adverse impact on the integrity of the place type policies or other relevant policies of the London Plan.**

- The proposed use of special policy is not necessary as there is no unique context to the site. The site is situated in a heritage designated neighbourhood with existing policies for the area. Houses are rated within the neighbourhood as to

heritage significance. 10 Marley has a B rating, 16 Marley has an A rating, and the houses closest to the new build site along the adjoining street – Bruce Street have a C rating. There is no evidence that the new build meets any of the criteria to align with these ratings.

- The wide horizontal massing of the townhouses is not in keeping with the heritage character of the area with smaller building mass. The townhouse design is two-and-a-half times wider than the existing house on site.
- The design plan has solid brick walls (no windows)on the sides of the building design. This does not conform to residential standards in the surrounding neighbourhood streets.
- Intensity needs to be appropriate to accommodate driveways; parking; landscape open space; outdoor amenity; buffering; setbacks and garbage storage areas. (953_) This proposal does not meet many of these requirements sufficiently due to the mass scale of the project.
- The layout and grading of a site should retain and incorporate desirable trees. (258_) Damaging existing trees and vegetation impacts natural habitats and established ecosystem connections. Bird species such as the red bellied woodpecker found in the habitat tree of 10 Marley Place, and the Chimney swift (a threatened species in Ontario) found nesting in the neighbourhood rely on these ecosystem connections for food and habitat resources. Trees provide the structure and ecological functions for ecosystems (386_). The Urban Forest Strategy plan outlines ways to manage the urban forest to maximum benefits and value where possible and aims to have no net loss of tree canopy cover. All trees and associated vegetation within London's boundary contribute to our Urban Forest. (384_)
- The proposal does not maintain the residential amenity and human scale of the neighbourhood as set out in the WV-OS HCD plan. The location of the townhouses at the rear of the property does not support the pedestrian streetscape, forming an incompatible oversize building mass visible from the streetscape of both Marley Place and Bruce Street. Neighbourhoods should be designed to protect the Natural Heritage System, adding to neighbourhood health, identity and sense of place. (918_12)

The London Plan and the WV-OS HCD plan collectively set out the requirements for development in the neighbourhood. Council adopted the Wortley Village-Old South HCD September 2014, and the London Plan came into effect May 2022. Both policy documents set out the directions to protect and enhance the neighbourhood of Wortley Village - Old South, creating a sense of place and identity. The rezoning application does not meet multiple criteria in either of these plans.

Infill of underutilized sites that are both respectful and compatible with the existing neighbourhood character is possible. The infill built at the site of 352 Ridout Street South demonstrates what is capable with thoughtful strategies to integrate appropriate height relationships to surroundings, and honour design characteristics reflective of the established neighbourhood area.

The London Plan requires the character of heritage conservation districts be maintained, that new development forms complement the prevailing character of the area, and that regard at all times to the guidelines and intent of the heritage conservation district plan be given. The rezoning application for 10 Marley Place does not meet these requirements. Intensification and utilizing the site with R3-1 zone is possible.

I urge city council and the planning committee to consider the many detailed concerns and development policy plans for neighbourhoods that the rezoning application request cannot comply with under the request of a site-specific policy conditions application and uphold the R3-1 zone policy for development within a heritage designated neighbourhood.

Public Comment – Kaaren Batten

It was over 35 years ago that I purchased my home and my family has enjoyed this neighbourhood for many years. The street is quiet and a lovely walking path for many of old south's families.

I believe infilling is important, but it must be done to preserve the character of the village. One of my main concerns is the request for variances to be altered. Sunlight will affect residents on Bruce and Marley, making variances extremely important. The stacked townhouses are not allowed and in my view are not appropriate. Parking is not positioned well on the present plan and needs to be in the green space planned in front of the new builds.

The Heritage committee has strict conditions which should be respected to comply with other homes in the village. They are there for a reason and not unreasonable.

Thankyou for the opportunity to express my concerns for this lovely quiet neighbourhood and please make wise decisions on our behalf.

Public Comment – Dave Hutchison

In a serendipitous act of kindness as Western student some 50+ years ago I came into Old South to live, work, raise a family while contributing effort, time and funds to the maintenance and growth of this marvelous community, as have many, many other active residents in numerous and varying ways.

I'm currently the owner of 71 Bruce Street, a late 1890's century triplex home around the corner from the lot for this proposed development, as well as being visible from some areas of my home. I also have joint ownership of another single family home in the area.

I oppose the proposed zoning change to R5-7 from R3-1 and planned development of four residences in the existing home and the eight proposed units to the rear of the property. It's too much intensification and of the wrong structure in the rear being large, horizontal and bulky that is not sympathetic to the surrounding properties and in general throughout the area.

This proposed structure and it's parking area at the front is also detraction from the pedestrian views at the street in the look and feel that will result. The possible elimination of mature tree canopy on the property, and possible damage to additional mature trees on surrounding properties in close proximtiy is not beneficial, nor in congruence with the City of London's views on encouraging more tree canopy density, an already prevalent feature of the Wortley Villlage/Old South neighbourhood.

This is a very strong and active community that we care about deeply, now and for the future. In addition, the streetscape of generally lower building heights and older buildings of varying ages with extensive tree canopy helps to augment the area's vibe and pleasantness. Walking is a common daily occurrence for many and that leads to informal and unexpected encounters between residents and in businesses supporting the area. That's all for the best. While being welcoming to new entrants we don't wish our existing habitat to be denigrated with such unwelcome intrusions as is proposed.

The existing R3-1 zoning provides for more a more acceptable and broad range of uses which the developer should consider and return to the community with an improved concept. I look to the City of London and my councillor to not approve the requested zoning change. Changing that R3-1 designation also lends credence to other developer's making similar or even more greater wishes for density and form.

Furthermore, I was recently advised by the developer's urban design planner that a 'board on board fence' is a requirement of the city. Such hoarding of and to the property is not acceptable as it creates visual silos to and from other properties which is not a characteristic of this, more open heritage district. In addition such modern and utilitarian looking fences are generally not typical to the area. Where they do exist they are ugly eyesores that proclaim themselves as modern suburbia subdivisions walled into each

property. That's but one defining characteristic of our neighbourhood where low and even open or even no fences are found to the rear of properties.

If /when the design phase begins there's a lot of other neighbourhood features that should be incorporated too, besides unifying any proposed new building to carry forward the features of the existing century home on the property, as well as being incorporated seamlessly into the streetscape. One small feature being the proposal to eliminate windows on the north and south side of the rear building, whatever form it eventually may be. Doing so, leaving a blank wall, is not in keeping with homes in the area which often have window and door openings to adjacent properties. That's a subtle but important way of connecting to and being in keeping with other buildings. A visual clue that the building itself is more open to its surrounding environment, for both dwellers and the general population. Another is breaking up any massing into separate and distinct components, not cookie cutter replication from unit to unit, should that come to pass.

In conclusion the zoning should not be altered, and any new proposal's massing, height and configuration should be optimized to the neighbourhood. Additionally, the architectural form of any building should be kept very sympathetic seamless to and with the existing homes, in both the immediate vicinity and beyond.

Public Comment – William Pol, on behalf of surrounding neighbours

Stacked Townhouses do not fit into the existing streetscape and is contrary to the extremely comprehensive document "Wortley Village-Old South Heritage Conservation District - Plan + Guidelines, September 2014”.

I am not in favour of the Official Plan Amendment nor the Zoning By-law Amendment from an R3 Zone to a R5 Zone including special provisions as proposed in OZ-25129 for 10 Marley Place and I believe the city Committees and Council should vote against these two amendments.

Pol Associates Inc. has been retained by surrounding neighbours to provide independent land use planning comments regarding the above application. The following comments are provided seeking Council refusal of the Official Plan and Zoning By-law amendments, because they do not conform to the London Plan policies for residential intensification; London Plan Specific Policy Area criteria; Wortley Village-Old South Heritage Conservation District policies; sound Residential R5-7 zoning; and retention/enhancement of the urban forest and tree canopy.

Summary:

- An Official Plan amendment for a Specific Policy at 10 Marley Place will set an argument for similar exceptions on other nearby properties and is therefore contrary to the Specific Policy criteria. The London Plan allows Stacked Townhouses on Neighbourhood Connector Streets, being Ridout Street and Wortley Road and is therefore an unnecessary exception on Marley Place.
- There is insufficient regard for the Wortley Road-Old South Heritage Conservation District because the wide massing of the building; location at the rear of the lot; parking effectively in the front yard; removal of mature trees; and absence of architectural details for the building façade.
- The site design is not sensitive to the neighbourhood character because setbacks are reduced; the large parking area is visible from the street; the building setback from the street discourages pedestrian access.
- The proposed construction of new buildings with reduced setbacks will likely result in the death of trees on abutting properties who share the mature tree canopy and roots contrary to London Plan policies.

Alternative Four Unit Townhouse Concept

The attached concept plan is prepared as an appropriate alternative to the townhouse proposal submitted. The concept shows the same townhouse building footprint as

proposed with four (4) standard townhouses. The layout is rotated 90 degrees and attached to the proposed fourplex dwelling. The south 15.0m side yard provides space for landscaping; sidewalk access; individual unit parking spaces; and landscape buffer. The north 6.1m side yard allows individual unit at grade rear yards and less impact on boundary trees, consistent with the R5 zoning. The east rear yard of 4.6m is appropriate for an end wall of a townhouse allowing convenient maintenance access along the end of the building. This alternative is more in keeping with the London Plan City Design Policies (LP 953_) described below:

- The building located behind the existing building is screened from Marley Street retaining the heritage character of the existing building and landscaped front yard;
- The increased side and rear yard setbacks are more consistent with established yards abutting the property offering greater compatibility;
- The increased side and rear yard setbacks reduce the potential damage to boundary line trees and vegetation due to construction or excavation;
- The townhouses are closer to the street improving pedestrian access;
- The parking area has less impact on the heritage character of the existing building and street because it is shifted further away from the front yard landscaped area;
- The parking area, located in front of each unit, is more convenient; and
- A narrower 4.0m driveway access is appropriate for a limited number of units, reducing the amount of hardscaping/paving.

Effectively this site layout, building location and character of the concept is a better fit and compatibility with abutting residences. The design is more appropriate for the development of the site with improved convenience and access to the units. Each unit has private at grade amenity space at the front and rear of the units. There are sufficient setbacks to create an aesthetic and functioning site at a scale appropriate to retain the heritage character of Marley Place and Old South.

Wortley Road- Old South Heritage Conservation District

Council adopted the Wortley Village-Old South Heritage Conservation District (HCD) in September 2014. The community is actively implementing the goals, objectives and principles by their activities to enhance and protect the heritage character of theneighbourhood. The subject site, 10 Marley Place is rated “B” in the HCD. This application does not give sufficient consideration to the HCD character as follows:

- The wide horizontal massing of the townhouse is not in keeping with the heritage character of the area where dwellings are smaller and narrower.
- The proposed townhouse location at the rear does not support the pedestrian comfort and amenity features encouraged in the HDC.
- Proposed parking and access located beside the existing building and in front of the townhouses, places parking near front yard, making it a predominant feature.
- Mature trees will be removed and building construction will likely result in the destruction/loss of trees and vegetation on bordering properties being an important HCD feature.
- There is no proposal to replace the trees or landscape plan. Mitigation measures proposed are insufficient and will likely have fatal impacts to abutting trees.
- There is no indication of the architectural design or building materials to understand if the façade design will or will not fit the character of the area.

London Plan Specific Area Amendment- Stacked Townhouses

The Official Plan Amendment request for a Specific Area (Policy 1730_) does not conform to the conditions and criteria for a Specific Policy as follows:

1. The proposal does not meet all other Plan policies for Neighbourhoods described in the Neighbourhood Place Type discussion below;

2. The proposed policy will have an adverse impact on the integrity of the Neighbourhood Place type by introducing a building form and land use not anticipated on Neighbourhood Streets;
3. The subject property is not unique and will effectively set an argument for a similar exceptions on other properties in Old South;
4. The proposal can be reasonably altered as shown in the attached concept for the Neighbourhood Place Type; and
5. The proposed policy is not in the public interest and is not good planning.

London Plan – Neighbourhoods Place Type

The London Plan sets out the intent to protect and enhance neighbourhoods across the City, creating a sense of place and identity. The proposed development must conform to the Neighbourhood Place Type policies contributing to this vision for the City as follows:

- The London Plan vision is to create a sense of community, well-being and quality of life, based on a strong neighbourhood character, sense of place and identity. (LP 916_1.) Old South and Marley Place specifically demonstrate a strong character, sense of place and identity in London.
- The London Plan designates the site and surrounding area as Neighbourhoods and Marley Place is not shown on the Transportation Schedule “C” therefore it is a Neighbourhood Street.
- Stacked Townhouses are not listed in the Range of primary permitted uses permitted on Table 10 Range of Permitted Uses on a Neighbourhood Street in the Neighbourhoods Place Type and are contrary to the intent of the Place Type.
- Infill development is allowed where it fits into the form of residential development (LP 937_). The proposed form located at the rear of the lot and with a horizontal mass significantly wider than surrounding smaller/narrow buildings and does not fit the existing neighbourhood form.
- The proposed infill does not add value to neighbourhood existing and planned character, quality and sustainability (LP 937_). Placement of the building at the rear of the lot; parking in front of the proposed townhouses; removal of onsite trees and damage to neighbouring trees will have a negative impact on the character, reducing the quality and sustainability of the surrounding area.
- The proposal is not purposeful, sensitive and compatible with the abutting uses based on the building location, reduced yards, building mass and loss of vegetation. (LP 939_)

London Plan Urban Forest and Urban Forest Strategy 2014

The City has adopted policies to plan and manage the Urban Forest proactively to protect, enhance and conserve the forest in a sustainable manner (LP 389_4.)

- The townhouse buildings excavation and construction activities near or on property lines, will likely have fatal effects on boundary trees because of root damage, tree limb removal and soil compaction. This is contrary to the intent of the Urban Forest policy.
- The Strategic Approach provides opportunities to protect and enhance the Urban Forest for tree replacement and evaluation. (LP 399_4.) No strategy for tree replacement and enhancement has been provided.
- The Urban Forest Strategy was adopted by Council in June 2014 to enhance tree canopy. The proposal does not respond to this strategy.

Residential R3-1 to R5-7 Zoning

- The request to introduce the R5-7 zone for Stacked Townhouses is not appropriate in relation to the surrounding Residential R3-1 zone.
- The request to reduce the north and south side yard setbacks from 3.0m to 2.2m is not necessary. A small reduction in each unit width will retain the established setback standard.

- The requested reduction in the rear yard from 6.0m to 3.0m and a reduced 1.5m setback for a deck is not necessary because there is sufficient lot area to move the buildings westerly consistent with the established rear yard standard.
- The proposed townhouses can comply with the setback provisions of the R5 zone and reduce the potential impact on surrounding lots and tree canopy.

Community Engagement

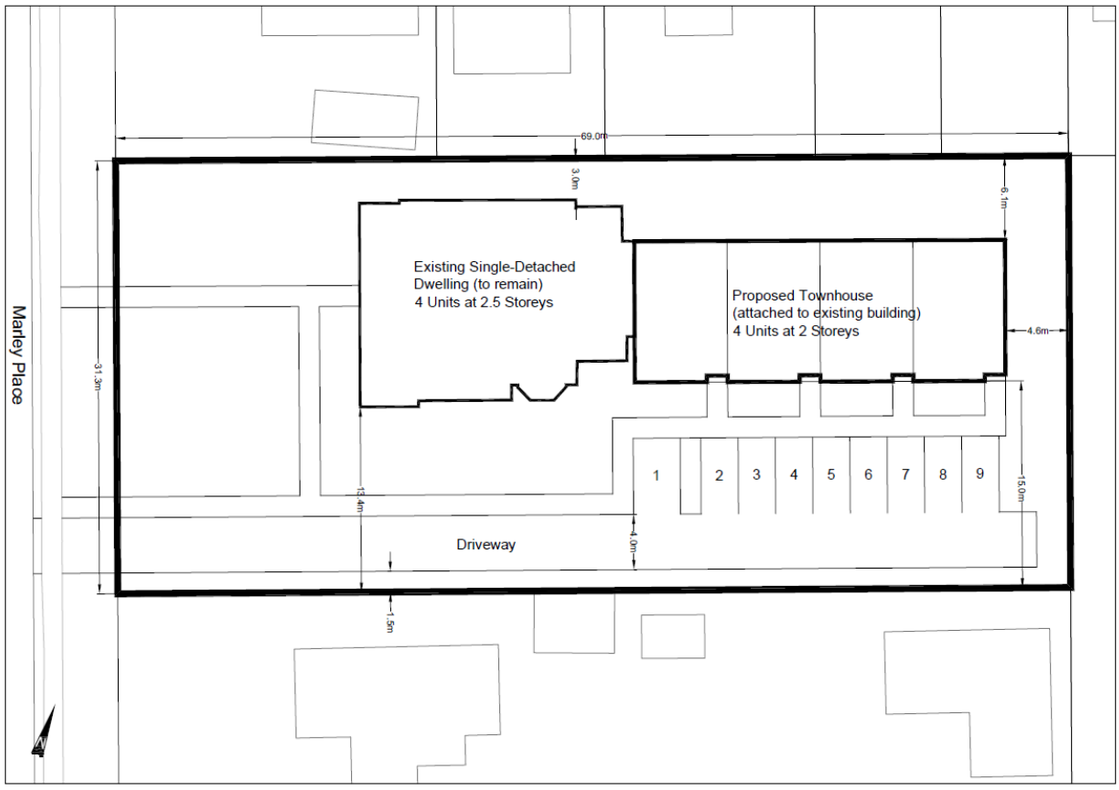
Members of the Old South neighbourhood, my clients and I have met to discuss this application. The community is active in encouraging compatible residential development in the neighbourhood. Residents attending the meeting expressed concerns that the proposal for four converted dwelling units and eight (8) stacked townhouse dwellings is not consistent with the heritage/residential neighbourhood character, type of dwellings, form of building and removal/risk to mature tree canopy. The community is deeply concerned that the proposed development will have a negative impact on Marley Place and Old South and have submitted numerous comments to staff and Council members on the application.

Based on the alternative concepts and review of policies above, we are asking Council to refuse the amendment applications. There are sufficient opportunities for infill and intensification without approval of the amendments to achieve the City's London Plan policies.

Should Council decide to approve a zoning amendment, the attached concept can be implemented by including the side and rear setbacks into a site specific amendment. This will maintain the heritage character; create a sensitive design; encourage neighbourhood fit; and retain the urban tree canopy retaining the exceptional Old South neighbourhood qualities.

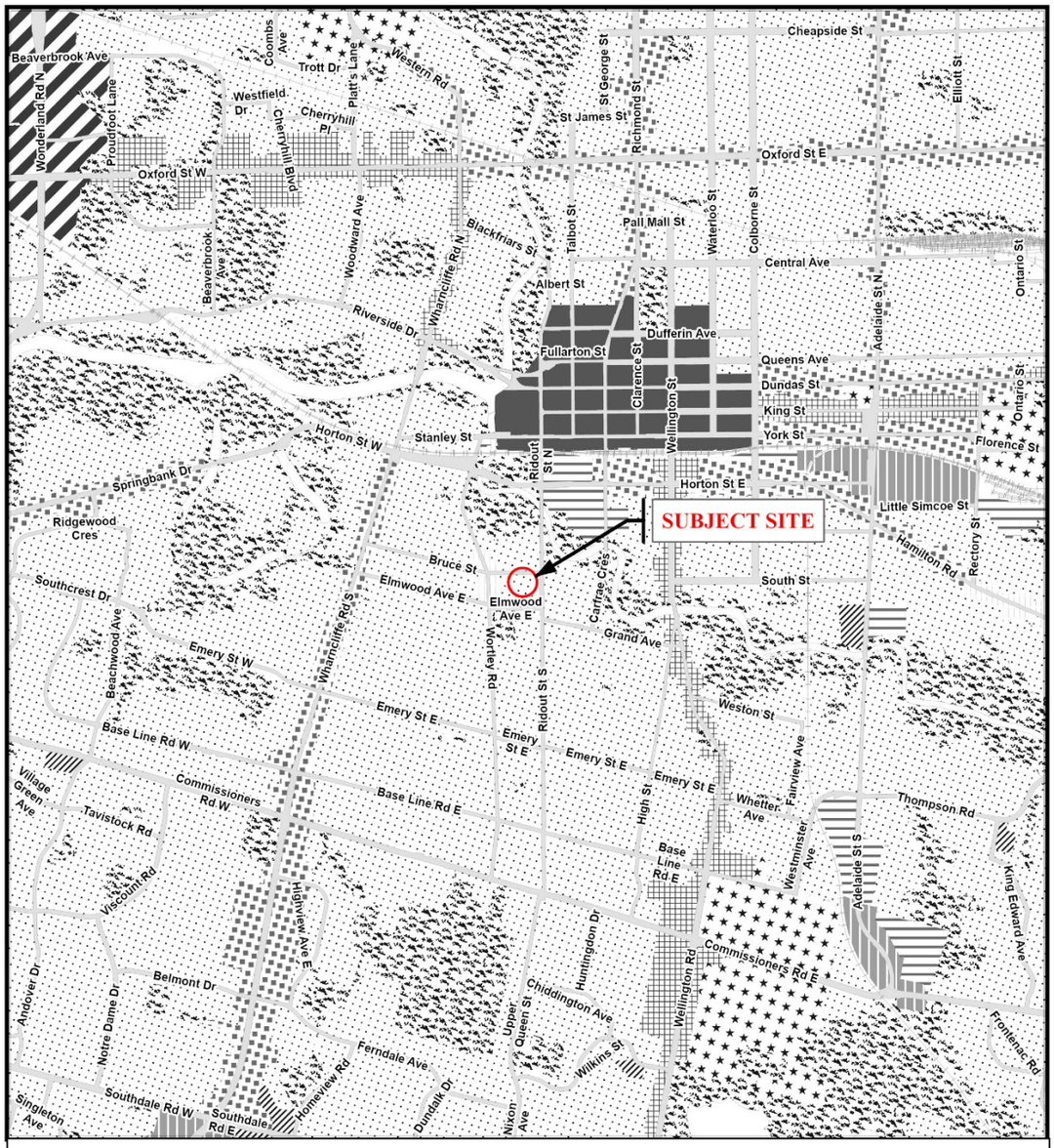
Please contact me should you have any questions. I will attend and present at the public meeting. Please include these comments in the Planning Staff report for consideration and include me in any future notices of meetings or application decision.

10 Marley Place OZ-25129 Prepared by Pol Associates Inc.
Four Townhouse Dwellings Alternative Layout



Appendix F – Relevant Background





Legend

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

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 -

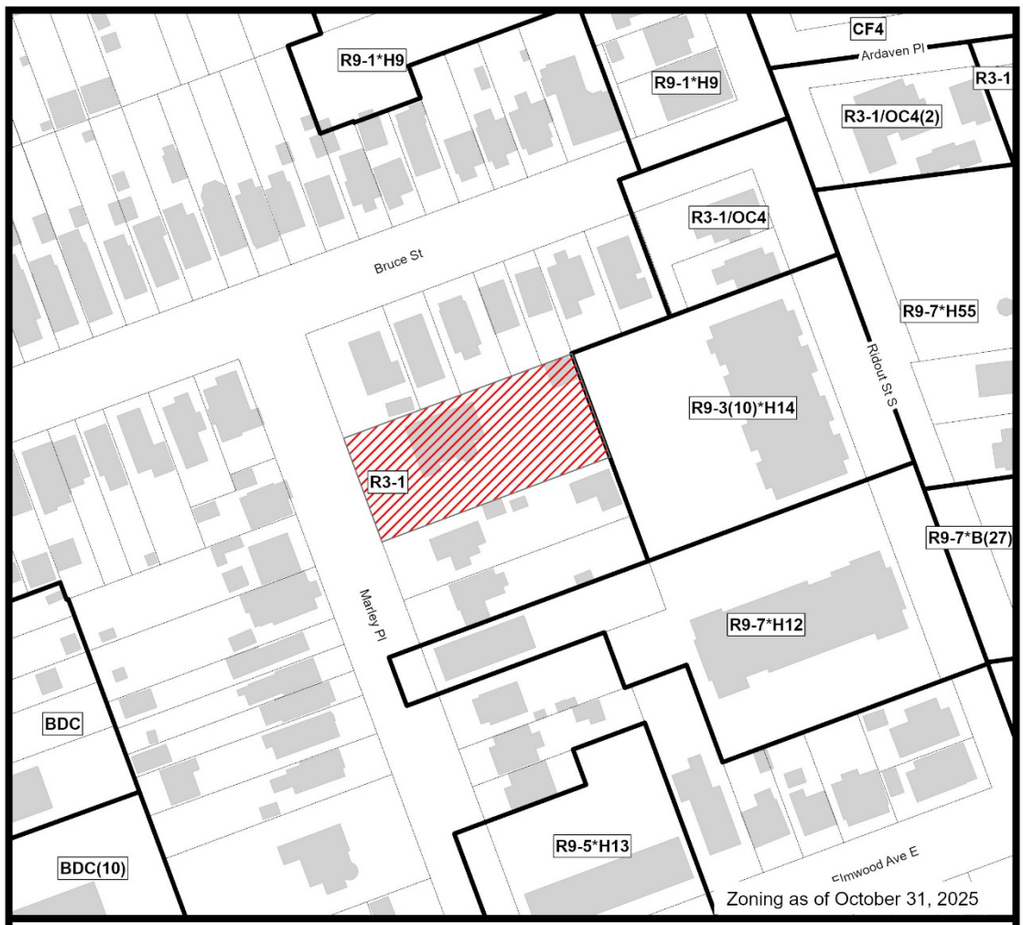
PREPARED BY: Planning & Development

Scale 1:30,000

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Meters

File Number:	OZ-25129
Planner:	MH
Technician	JI
Date:	2025/11/25

Project Location: E:\Planning\Projects\p_officialplan\workconsol00\excerpts_LondonPlan\excerpts_LondonPlan_ArcPro\excerpts_LondonPlan.aprx



COUNCIL APPROVED ZONING FOR THE SUBJECT SITE: R3-1

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-25129 MH

MAP PREPARED:
2025/11/25 JI

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Meters