Correct eight drafting gaps so London's existing small buildings keep the uses they have today

October 29, 2026

To Justin Adema and Jeff Shaughnessy, Planning and Development, City of London

Copy to the City Clerk, for Municipal Council and the Planning and Environment Committee

Re File Z-26114, Draft Zoning By-law ZBL-27 (Public Release Draft, September 17, 2026)

Summary

The draft by-law makes most big projects easier. It is stricter in one place, small changes to buildings that already exist.

Three groups of existing buildings would lose a use they have today.

- About 2,700 to 2,900 houses in zones where a house is no longer a listed use. Owners can stay but can't add on without a minor variance.
- About 790 Main Street properties where today's zoning allows a few units inside an existing commercial building, but the draft doesn't.
- About 400 small buildings with two to five units, in zones that no longer list that kind of building.

Most of the other items look like drafting slips, not decisions. Rooming houses are defined but allowed in no zone, a parking rate council voted for in July was left out, and a lot-coverage limit is lower than provincial law already allows.

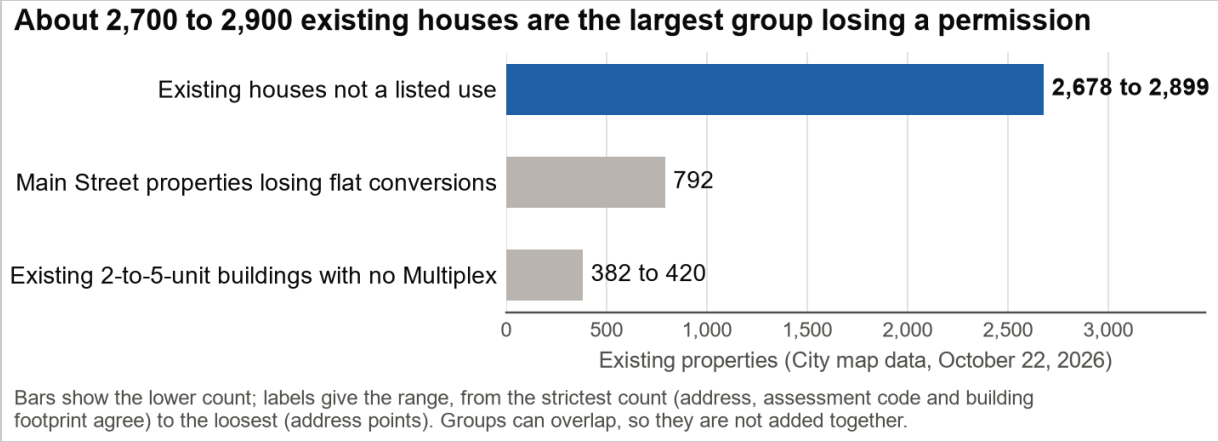
The request

I'm asking staff to fix the eight gaps (items 1 to 8) in the January 2027 report, and to answer all 16 items. Most look like omissions that can be fixed without reopening a council decision. Attachment 1 gives each item's clause and a proposed wording. Attachment 2 shows where each one sits in the draft.

Where the draft already helps

Section 3.19 treats a converted commercial, office or institutional building as compliant within its existing envelope, which Z.-1 never did. Five units become allowed as of right in NR3 to NR6 and NM3 to NM5, with no parking required for additional units. The gaps below are where the draft is stricter, in small changes to buildings that already exist.

Three groups of buildings lose a permission they have today



Houses aren't a listed use in NR1, NR2, C1 to C4, NM1 and NM2, or in the main street, downtown, transit village and shopping area zones (item 3). Ten zones permit Apartment but not Multiplex (NR1, NR2, MS, D, TV, SA, C1, C2, NM1 and NM2), so the zone at 745 Dundas Street permits a six-unit Apartment but not a three-unit Multiplex (item 2). These buildings can carry on as they are, but s.1.1.10(2) blocks any addition without a minor variance.

Ottawa avoided both gaps by permitting one use, the dwelling unit, capped per lot. That approach, or a clause allowing any permitted building with fewer units, would close both gaps.

Six more gaps look like omissions

I couldn't find a council or committee decision behind any of them. If one was deliberate, please give the reason in the January report.

1. Rooming houses are defined but allowed in no zone (item 1). Restore the May 2026 rows outside the Near-Campus Neighbourhoods, with a cap by zone and a link to the rental licence.
2. Table 4.2 leaves out council's July 21, 2026 rate of 0.5 parking spaces per affordable unit (item 4). Please confirm it carries over, with its definition.
3. NR4 and NR5 coverage is 35% or 25%, but O. Reg. 299/19 s.5(1)1 already allows 45% on lots with one or two additional units (item 5). Please state 45% for any lot with an additional unit.
4. Two maps are both called Schedule B, and the parking one isn't published (item 6). Publish both, define "Major Street", and write the parking exemption into the text, at least for the transit station areas where Planning Act s.34(1.1) bars minimums.
5. Some labels contradict each other, such as a 30 m minimum-frontage note on maximum-frontage cells (item 7). Attachment 1 lists them.
6. Four sections set tie-breakers for conflicting rules, and they can give different answers (item 8). One rule in s.1.2 saying the more specific provision governs would settle it.

Ottawa fixed omissions like these as oversights

Ottawa listed its final amendments in a table of "changes to correct errors", and its second draft restored provisions dropped "in error" or as "an oversight". Kitchener changed its 2024 station-area zoning for 55% of the 56 submissions it received.

Please publish these with the January report, and variance counts each year after.

- An errors table
- A change-of-intent table
- A conversion table
- A track-changes copy
- A response chart

Let the Tribunal decide the basement and backyard unit caps first

In March, council capped additional residential units (basement, garden and laneway suites) at 80% of the size of the main unit and limited their bedrooms. That by-law is under appeal at the Ontario Land Tribunal (OLT-26-000331), and the hearing is scheduled to start February 17, 2027. The draft copies the same caps into the new by-law. The eight gaps above don't touch this decision.

I'm not asking council to undo the caps. I'm asking that s.3.18.1(a) and s.3.18.2 follow whatever the Tribunal decides, so the same question isn't appealed twice. If the caps stay, the 80% limit fits detached suites, where size caps are common in other Ontario cities, and a single bedroom total for the whole lot is simpler than a count per unit.

Two dates and one question

Please confirm the dates of the statutory public meeting and the open house. Please also confirm in writing that comments sent after October 30, including at the November 24 information session, will be summarized for the Planning and Environment Committee.

One question about the near-campus bedroom limit. Section 23.1(a) adds a bedroom per additional unit near campus, but I can't find the base limit of three per unit that it adds to. Where is it carried forward?

I'd be glad to walk through any item before the January report.

Thank you for the work that went into this draft.

Sean Dollimore

London, Ontario

Attachment 1. The 16 items, in the order staff can act on them

Item	Clause	Proposed change
1. Rooming houses	s.2; Table 4.2; notes in Tables 7.1, 9.1, 10.10.1, 12.1; s.3.12	Outside the Near-Campus Neighbourhoods, restore the May 2026 rows and an equivalent of Z.-1 Class 1; a cap tied to the zone; a licence cross-reference
2. Multiplex where Apartment is permitted	Use tables 7.1 to 13.1	Permit Multiplex in NR1, NR2, MS, D, TV, SA, C1, C2, NM1 and NM2, within the London Plan place-type permissions; or permit one use, the dwelling unit, capped per lot, as Ottawa's By-law 2026-50 does
3. Existing houses and the NR2 host	Tables 13.1, 13.4 to 13.10 note (1); s.1.1.10(2); s.3.18(a)	List existing detached and semi-detached houses in NR1, NR2, C1 to C4, NM1 and NM2; name the NR2 house as a host
4. Affordable parking rate	Table 4.2; Z.-1 s.4.19(10)(a)(ii) and (iii)	Carry over Z.-1-263466 as enacted (0.5 per affordable unit, the table rate for the rest, council's definition and reversion clause); say whether (iii) carries over
5. Coverage on lots with an additional residential unit	Tables 13.4 to 13.6	State 45% on any lot with an additional residential unit, citing O. Reg. 299/19 s.5(1)1, which already governs lots with one or two
6. Schedule B, parking exemption and definitions	s.1.3; s.4.2.3; s.1.2.1	Two maps under two letters, both published; the parking exemption defined in the text, covering at least every Protected Major Transit Station Area (Planning Act s.34(1.1)), with any distance rule limited to corridor and main street zones; say whether Urban Corridors are exempt; define every operative term
7. Labelling defects	Tables 13.4 to 13.6; s.3.18.1(c) and s.4.1.10(c); provisions 23.77, 23.139, 23.140	Note (1) moved from the maximum-frontage cells to the minimum-frontage row; one driveway rule in place of s.3.18.1(c) and s.4.1.10(c); the three site-specific provisions checked for the same mismatch; each defect fixed before the statutory meeting
8. Conflict hierarchy	s.1.2.2, s.3.1, s.22, s.3.4.3(a); s.1.1.11	One specificity rule in s.1.2; confirm every drawing is labelled as a binding Diagram or a non-binding Illustration, as s.1.2.2 provides
9. Documents with the staff report	None	Errors table, change-of-intent table, conversion table, track-changes copy and a response chart
10. Tolerances and existing buildings	s.1.2.3; Z.-1 s.4.16(3); s.3.19	Cross-reference O. Reg. 257/25; restore the 80% lot rule; extend s.3.19 to existing houses, within the existing envelope and the applicable coverage limit; carry prior minor variances forward

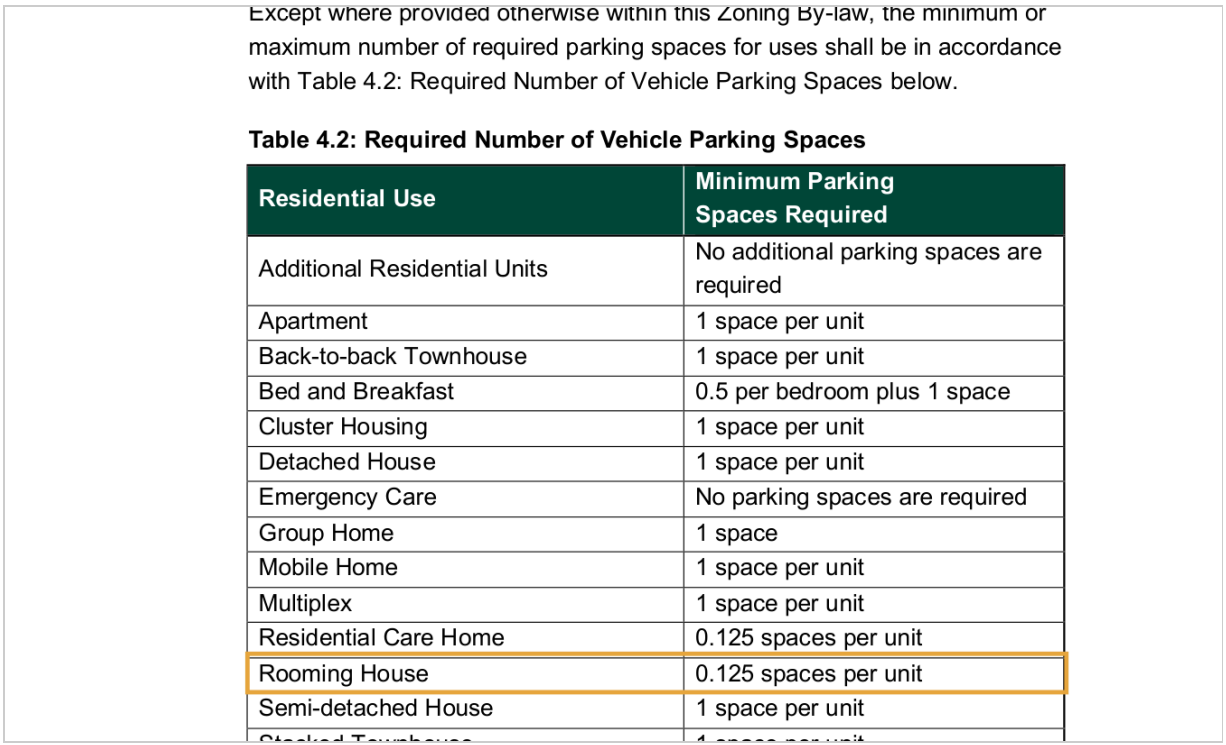
11. Envelope numbers	s.3.18.3; Tables 13.4 to 13.6 and 13.9	Toronto's window setback formula; 6.3 m accessory height; "as existing" frontage for lawful corridor lots; minimum heights for new buildings only; a test of the draft on ten London lots, reporting how many 2023 to 2026 variances would still be needed
12. Transition	s.1.1.8; s.23(c); s.25.1	Fix the sunset cross-reference; a map layer for lots still under Z.-1, with a dated review; unappealed provisions govern during appeals
13. Variance monitoring	None	Annual variance counts by standard and zone, and a dated report-back before 2030
14. ARU caps and the near-campus limit	s.3.18.1(a), s.3.18.2; s.23.1(a)	Follow the Tribunal's outcome; the 80% limit for detached suites only; a lot-level bedroom total; confirm where the near-campus limit of three bedrooms per unit is carried forward, and keep it
15. The sixth unit	Table 13.1; Table 13.9; s.4.2.2	Multiplex to 6 units within the same envelope and the Neighbourhoods place-type permissions
16. Reasons on the record	50% first-storey cap; the 5 and 6 unit line; converted dwellings; NR1 and NR2 use lists; rooming houses	A stated rationale for each in the January report

Attachment 2. Where each item sits in the draft

Each item below has four parts: what the draft says now, why it matters, what I am asking staff to change, and why. The pictures are cut from the Public Release Draft of September 17, 2026, with the clause boxed. The page number is the one printed on the draft. Three items (9, 13 and 16) ask for a document rather than a change to the text, so they have no picture.

1. Rooming houses (draft p.78)

What the draft says	Section 2 defines a rooming house. Table 4.2 sets its parking rate at 0.125 spaces per unit. No use table lists it as a permitted use. The May 2026 draft did. [1] [2]
Why it matters	As written, no new rooming house is permitted anywhere, and an existing one cannot expand without a hearing. Today's by-law permits them in its R8 to R11, OR, BDC, DA and transit station zones, and the City licenses them. [3] A housing type that one person can rent one room of would stop being allowed by omission.
What I am asking	Put the May 2026 rows back, outside the Near-Campus Neighbourhoods, with a cap tied to the zone and a cross-reference to the rental licence.
Why	I could not find a council decision to drop the rows. Ottawa's second draft put back provisions its first draft had dropped, among them a shelter permission and a parking exemption, calling the drop "an oversight". [21]



Except where provided otherwise within this Zoning By-law, the minimum or maximum number of required parking spaces for uses shall be in accordance with Table 4.2: Required Number of Vehicle Parking Spaces below.

Table 4.2: Required Number of Vehicle Parking Spaces

Residential Use	Minimum Parking Spaces Required
Additional Residential Units	No additional parking spaces are required
Apartment	1 space per unit
Back-to-back Townhouse	1 space per unit
Bed and Breakfast	0.5 per bedroom plus 1 space
Cluster Housing	1 space per unit
Detached House	1 space per unit
Emergency Care	No parking spaces are required
Group Home	1 space
Mobile Home	1 space per unit
Multiplex	1 space per unit
Residential Care Home	0.125 spaces per unit
Rooming House	0.125 spaces per unit
Semi-detached House	1 space per unit
Stacked Townhouse	1 space per unit

2. Multiplex where Apartment is permitted (draft p.133)

What the draft says	Table 13.1 permits Apartment (6 or more units) in NR1 and NR2 but not Multiplex (2 to 5 units). The main street, downtown, transit village, shopping area and C1 and C2 corridor tables follow the same pattern, ten zones in all.
Why it matters	This affects buildings that already exist. A house or shop in these zones cannot become two to five units, while a six-unit building is allowed. About 400 existing small buildings and about 790 Main Street properties sit in these zones. [20]
What I am asking	Permit Multiplex wherever Apartment is permitted, within the London Plan place-type permissions. Or permit one use, the dwelling unit, capped per lot, as Ottawa's By-law 2026-50 does. [12]
Why	A smaller building is not a bigger planning question than a larger one. The ask stays inside what the London Plan already permits for these place types.

Table 13.1: Permitted Uses

Residential Uses	NR1	NR2	NR3	NR4	NR5	NR6	NR7
Detached House	–	–	✓	✓	✓	✓ (3)	✓ (3)
Semi-detached House	–	–	✓	✓	✓	✓ (3)	✓ (3)
Multiplex	–	–	✓	✓	✓	✓ (3)	–
Street Townhouse	–	–	✓ (4)	✓ (4)	✓ (4)	✓	–
Back-to-back Townhouse	–	–	–	–	–	✓	–
Stacked Townhouse	✓	✓	–	–	–	✓	–
Apartment	✓	✓	–	–	–	–	–
Residential Care Home	✓	✓	–	–	–	–	–
Cluster Housing	–	–	–	–	–	✓	–

3. Existing houses and the NR2 host (draft p.6 and p.133)

What the draft says	Table 13.1 does not list a detached or semi-detached house in NR1 or NR2 (first picture). The C1 to C4, NM1 and NM2 tables do the same, and so do the main street, downtown, transit village and shopping area tables. Section 1.1.10(2) says a building used for a purpose its zone does not list cannot be enlarged (second picture). Section 3.18(a) names the buildings a suite may attach to, and an NR2 house is not among them.
Why it matters	About 2,700 to 2,900 existing houses sit in zones that do not list a house, about 1,000 of them in NR2. [20] Each can stay as it is. The owner cannot add on or add a garden suite without a hearing. Section 1.1.10(5) lets the house be rebuilt after a fire, but no larger. In NR2, the additional unit permission has no house to attach to.
What I am asking	List existing detached and semi-detached houses as a permitted use in NR1, NR2, C1 to C4, NM1 and NM2. Name the NR2 house as a host for additional units.
Why	Z.-1 handled this with an "existing dwellings" use in its commercial zones. [4] Ottawa's staff wrote that they "generally tried to avoid rendering existing uses non-conforming by removing permissions for an existing use". [10]

Table 13.1: Permitted Uses

Residential Uses	NR1	NR2	NR3	NR4	NR5	NR6	NR7
Detached House	–	–	✓	✓	✓	✓ (3)	✓ (3)
Semi-detached House	–	–	✓	✓	✓	✓ (3)	✓ (3)
Multiplex	–	–	✓	✓	✓	✓ (3)	–
Street Townhouse	–	–	✓ (4)	✓ (4)	✓ (4)	✓	–
Back-to-back Townhouse	–	–	–	–	–	✓	–
Stacked Townhouse	✓	✓	–	–	–	✓	–
Apartment	✓	✓	–	–	–	–	–
Residential Care Home	✓	✓	–	–	–	–	–
Cluster Housing	–	–	–	–	–	✓	–

amendments thereto, are hereby repealed insofar as they affect the lands covered by this By-law, as shown on Schedule “A” to this By-law.

1.1.10 Non-conforming Uses

1) **Continuation of Existing Uses**
The provisions of this By-law shall not apply to prevent the use of any land, building or structure for any purpose prohibited by this By-law if such existing lot, building or structure was lawfully used for such purposes, prior to the effective date of this By-law and provided that the lot, building or structure continues to be used for that purpose.

2) **Exterior Extension**
Any building or structure which was lawfully used prior to the effective date of this By-law for a purpose not permissible within the zone in which it is located, shall not be enlarged or extended, unless such building or structure is thereafter to be used for a purpose permitted within such zone, and complies with all requirements of this By-law for such zone unless these changes are necessary to provide for flood-proofing or insulation of the building.

4. Affordable parking rate (draft p.78)

What the draft says	Table 4.2 has no row for affordable units. On July 21, 2026, council adopted a rate of 0.5 spaces per affordable unit (Z.-1-263466). [5]
Why it matters	Unless the rate is carried over, affordable units go back to the full rate when the new by-law takes effect. The draft, released two months after council lowered the rate, omits it.
What I am asking	Carry over the July rate with its definition and reversion clause. Say whether clause (iii), the table rate for the rest of a mixed building, carries over.
Why	Council has already decided this. Nothing new is being asked.

Except where provided otherwise within this Zoning By-law, the minimum or maximum number of required parking spaces for uses shall be in accordance with Table 4.2: Required Number of Vehicle Parking Spaces below.

Table 4.2: Required Number of Vehicle Parking Spaces

No affordable-unit row. It would sit here.

Residential Use	Minimum Parking Spaces Required
Additional Residential Units	No additional parking spaces are required
Apartment	1 space per unit
Back-to-back Townhouse	1 space per unit
Bed and Breakfast	0.5 per bedroom plus 1 space
Cluster Housing	1 space per unit
Detached House	1 space per unit
Emergency Care	No parking spaces are required
Group Home	1 space
Mobile Home	1 space per unit
Multiplex	1 space per unit
Residential Care Home	0.125 spaces per unit
Rooming House	0.125 spaces per unit
Semi-detached House	1 space per unit
Stacked Townhouse	1 space per unit

5. Coverage on lots with an additional residential unit (draft p.136)

What the draft says	Table 13.4 lets a house cover 35% of its lot in NR4 and 25% in NR5. The 45% row applies only when the extra unit is in a separate building. Provincial rule O. Reg. 299/19 s.5(1)1 allows 45% on any lot with one or two additional units. [6]
Why it matters	On lots with one or two suites the provincial rule governs by law, so the table gives an owner the wrong number. They may stop at 35% when they could build to 45%, or apply for a variance they do not need. The regulation does not distinguish a suite inside the house from one in a separate building, and the draft gives no reason for doing so.
What I am asking	Print 45% for any lot with an additional residential unit, inside the house or not, and cite the regulation. Extending it to lots with three or four suites is a proposal; the regulation stops at two.
Why	This is a clarity change. It alters no outcome the law does not already set.

Table 13.4: Detached House Regulations

Regulations	NR3	NR4	NR5	NR6	NR7
Minimum lot frontage	9.0m or as determined by Section 13.3.3	12.0m or as determined by Section 13.3.3	16.0m or as determined by Section 13.3.3	9.0m or as determined by Section 13.3.3	7.0m or as determined by Section 13.3.3
Maximum lot frontage	12.0m or as determined by Section 13.3.3 (1)	18.0m or as determined by Section 13.3.3 (1)	23.0m or as determined by Section 13.3.3 (1)	-	-
Maximum lot coverage	45%	35%	25%	See Note 2	60%
Maximum lot coverage where Additional Residential Units are provided in an accessory building	45%	45%	45%	See Note 2	60%
	10.5m or as shown	10.5m or as shown	12.0m or as shown		

6. Schedule B, parking exemption and definitions (draft p.83 and p.142)

What the draft says	Section 4.2.3 removes parking minimums on lands shown on "Schedule B". That map is not published. A second map, for special heights, is also called Schedule B. "Major Street" is used but not defined.
Why it matters	A reader cannot tell which lots are exempt, and two schedules with one name can be cited against each other.
What I am asking	Publish both maps under two letters. Write the exemption into the text, covering at least every Protected Major Transit Station Area. Limit any distance-based rule to the corridor and main street zones, and say whether Urban Corridors are exempt. Define each operative term, "Major Street" first.
Why	Planning Act s.34(1.1) already bars parking minimums in those station areas. [8] A written rule survives a map change.

4.2.3 Parking Standard Areas

Minimum parking standards shall not apply within on lands shown on Schedule B: Areas Exempt from Minimum Parking Standards [generally corresponds to the Downtown, Transit Village, Rapid Transit Corridor, and Main Street Place Types in the London Plan].

4.2.4 Yards Where Parking Areas Permitted

a) No person shall use any land or cause or permit the use of any land situated in any zone for the purpose of parking or storage of a vehicle in any front yard or exterior side yard.

b) No person shall use any land or cause or permit the use of any land situated in any zone for the purposes of uncovered surface parking areas in any front yard or exterior side yard.

c) Notwithstanding the yard and setback provisions of this By-law to the contrary, uncovered surface parking areas that conform to the surface and drainage of parking areas and driveways provisions of this By-law, shall be permitted in the yards or in the area between the required road allowance and the required setback identified in Table 4.4: Yards Where Parking Areas Permitted below.

Maximum lot coverage	60%	45%
Minimum height	8.0m	8.0m
Maximum height	34.0m or as shown on Schedule “B” (Special Heights)	21.0m or as shown on Schedule “B” (Special Heights)
Minimum first storey height	4.0m	4.0m
Maximum residential	200 uph	100 uph

7. Labelling defects (draft p.77 and p.63)

What the draft says	Section 4.1.10(c) permits a new driveway "in association with" an additional unit. Section 3.18.1(c) bars one "solely for" an additional unit. Table 13.4 puts a 30 m minimum-frontage note on the maximum-frontage cells. Attachment 1 lists the site-specific provisions to check for the same slip.
Why it matters	The two driveway clauses can be read together, but an owner has to guess how. A note on the wrong cell gives the wrong number. Either can end up argued at the Committee of Adjustment or the Tribunal.
What I am asking	One driveway rule in place of the two. The note moved to the minimum-frontage row. Each label corrected before the statutory meeting.
Why	These are the kind of corrections Ottawa listed in its errors table. [9] No decision is needed, only a check.

maximum residential garage width, measured from interior foundation wall to interior foundation wall, shall not exceed 53% of the lot frontage.

4.1.10 Residential Driveways and Walkways Adjacent to Driveways

a) Walkways connected to and parallel to a driveway may increase to the width of the residential garage and/or the legal parking area of the residential property.

b) A walkway connected to and parallel to a driveway may project into a front or exterior side yard of a detached or semi-detached house or multiplex, provided that the projection into the front or exterior side yard is no greater than 2.0 metres.

c) A new additional driveway in association with an additional residential unit is permitted.

d) Street oriented townhouse dwellings in a cluster form, the maximum driveway width leading to a parking area shall be no greater than 3.0 metres for a single car garage and no greater than 6.0 metres when leading to a 2 car garage.

e) For freehold street townhouse dwellings, the maximum driveway width

3.18.1 Size and Intensity Regulations

a) The gross floor area of any additional residential unit shall not exceed 80% of the gross floor area of the principal dwelling unit, excluding common or shared utility areas.

b) No additional parking shall be required for an additional residential unit.

c) No new driveway shall be permitted solely for an additional residential unit.

8. Conflict hierarchy (draft p.9, p.50, p.171 and p.51)

What the draft says	Four sections say what happens when two rules disagree. The four pictures show them in this order. Section 1.2.2: a bracketed note in a table beats any other regulation, stricter or not. Section 3.1: where two provisions apply, the more restrictive one applies, "unless otherwise provided". Section 22: an overlay zone beats the zone underneath it. Section 3.4.3(a): for an accessory building with several setback rules, the largest applies.
Why it matters	The first two are general rules and, on my reading, can give opposite answers. A table note that allows a smaller setback than the general provision wins under 1.2.2 and loses under 3.1. Section 22 is narrow, but it can cross 3.1 the same way when an overlay rule is the looser one. Section 3.4.3(a) repeats 3.1 for one case, so it is a fourth place to look rather than a conflict. The by-law never says how these fit together.
What I am asking	One rule in section 1.2 that the more specific provision governs. A check that every drawing is labelled as a binding Diagram or a non-binding Illustration, as section 1.2.2 provides.
Why	One rule is easier to apply than four, for staff and for owners.

regulations are described as a maximum requirement, in which case the maximum requirement applies.

1.2.2 Diagrams, Illustrations and Tables

This By-law provides numbered diagrams, illustrations, and tables to provide additional clarity for the user. Diagrams and tables form part of this By-law. Illustrations do not form part of this By-law and are provided for convenience and reference only.

A symbol " ✓ " in a cell in a permitted use table means a use is permitted in a zone.

A symbol " — " in a cell in a regulation table means the regulation does not apply.

A number in brackets in a permitted use table or a regulation table indicates that one or more additional regulations apply. The additional regulations associated with the use or regulation within the table supersede any other regulations within this By-law where a conflict exists.

3.1 APPLICABILITY OF GENERAL PROVISIONS

No person shall erect or use any building or structure or use any land, or cause or permit any building or structure to be erected or used or cause or permit any land to be used in any zone within the City of London for lands affected by this By-Law except in conformity with the regulations specified by the applicable general and use-specific provisions set out in this by-law.

Where two or more provisions of this By-law apply to the same building, structure or use of land, the more restrictive provision shall apply, unless otherwise provided by this By-law.

3.2 ACCESS REQUIREMENTS

Section 22: Overlay Zones

Where an Overlay Zone applies, the provisions and regulations of the underlying zone shall continue to apply, but there may be additional provisions and regulations applied, or conditions that must be fulfilled prior to the granting of any planning approvals or the issuance of a building permit. In the case of a conflict between the Overlay Zone and another applicable zone, the regulations of the Overlay Zone supersede those of any other applicable zone.

22.1 APPLICABLE ZONES

included in the calculation for lot coverage.

3.4.3 Setbacks

a) Where multiple setback provisions apply to an accessory building or structure, the greatest minimum setback shall apply.

b) No accessory building or structure shall be permitted within a provided front yard, except as described in Section 3.17: Yard Encroachments.

c) An accessory building or structure shall comply with the minimum front

9. Documents with the staff report (no clause)

What the draft says	The January 2027 report will carry staff's responses. No errors table, conversion table or track-changes copy has been promised.
Why it matters	Without them, a reader cannot see what changed from the September draft or how today's zones map to the new ones.
What I am asking	An errors table, a change-of-intent table, a conversion table, a track-changes copy and a response chart with the report.
Why	Ottawa published the first four with its final draft, and Guelph published a response chart. [9] [14] Kitchener reported which submissions changed its text (55% of them) and which were turned down for insufficient justification. [13]

10. Tolerances and existing buildings (draft p.64)

What the draft says	Section 3.19 deems a converted shop, office or institution to comply if the work stays inside the existing walls. Houses get no such clause. Z.-1's rule that a lot within 80% of the minimum size still counts is gone. [3]
Why it matters	An office can become apartments without a variance. A house converting to the same number of units has no equivalent clause, so each departure from the tables needs one.
What I am asking	Extend section 3.19 to existing houses within the existing envelope and the coverage limit. Restore the 80% lot rule, cross-reference O. Reg. 257/25, and carry prior minor variances forward. [7] [18]
Why	The draft already accepts the principle for commercial buildings. This applies it evenly.

iii. connected to adequate private individual water and sanitary services in accordance with applicable law.

3.19 COMMERCIAL-TO-RESIDENTIAL CONVERSIONS

a) Where a lawfully existing commercial, office, or institutional building is converted, in whole or in part, to residential use, the existing building shall be deemed to comply with the requirements of this By-law, provided that the conversion occurs wholly within the existing building envelope.

b) Any addition, enlargement, or new building constructed in association with the conversion shall be required to comply with the requirements of this By-law.

3.20 CONSTRUCTION USES, MODEL HOMES AND TEMPORARY SALES OFFICES

3.20.1 Construction-related Uses

Temporary buildings, temporary structures, trailers, storage areas, and equipment associated with construction work shall be permitted in any zone on the lot where construction is occurring, provided that:

a) a building permit, site alteration permit, subdivision agreement, site plan

11. Envelope numbers (draft p.63)

What the draft says	A building has to fit inside an invisible box. The box is set by three things. How far the building sits from each lot line (the setback), how tall it can be, and how wide the lot is along the street (the frontage). Several of the draft's numbers set that box. Section 3.18.3(d) makes a garden suite sit 3 m from a side or rear lot line if it has a window on that side. Garden suites also follow the height limit for accessory buildings such as garages and sheds. Tables 13.4 to 13.6 cap lot width at 12 m, 18 m and 23 m in NR3 to NR5. The C1 to C4 corridor zones need a 30 m minimum width. Table 13.9 sets an 8 m minimum height and a 4 m first storey for apartments, with no "new buildings only" note.
Why it matters	When a plan misses one of these numbers by a little, the owner applies for a minor variance. That means a hearing at the Committee of Adjustment, a fee, notice to neighbours and a few months' wait. On a 12 m wide lot, a 3 m setback on each side leaves about 6 m for a garden suite. A maximum lot width blocks joining two narrow lots. A 30 m minimum on a corridor misses many existing lots. An existing low building converting to apartments fails the height rule even after rezoning. Toronto's monitoring found about one multiplex permit in ten needed a variance. [16] Its garden-suite review raised the height limit to 6.3 m, a change it expected to remove two thirds of past height variances. [17]
What I am asking	Toronto's window setback formula, the greater of 1.5 m or 10% of lot frontage, up to 3 m. A 6.3 m height for accessory buildings, which covers garden suites. "As existing" frontage for corridor lots that were lawful before the by-law. Minimum heights for new buildings only. I also ask staff to test the draft on ten real London lots. The test would report how many variances approved from 2023 to 2026 would still be needed. Guelph tested its draft in a similar way, with architects' demonstration plans on standard lots. [14]
Why	Ottawa moved numbers like these in its final draft when commenters showed they were hard to meet in practice. [9] These are the numbers most likely to send owners to a hearing.

d) No more than 3 bedrooms total shall be permitted across all additional residential units located within an accessory building.

3.18.3 Detached Additional Residential Units

a) All applicable regulations for accessory buildings shall apply to detached additional residential units.

b) A maximum of 2 additional residential units may be permitted within no more than 1 accessory building per lot.

c) A detached additional residential unit shall only be permitted in a rear yard or interior side yard.

d) Where windows of a detached additional residential unit face an interior side or rear lot line, the minimum setback from that lot line shall be a minimum of 3.0 metres.

e) A detached additional residential unit shall be connected to municipal services.

12. Transition (draft p.2, p.6 and p.176)

What the draft says	Section 1.1.8 keeps the old by-law, Z.-1, alive for ten years on some lots (first picture). They are lots that had a variance, consent, site plan or rezoning since January 1, 2017. Its end clause, 1.1.8(6)(b), says "Section 1.1.9 shall no longer apply 10 years after" passage. But 1.1.9 is the repeal section; the clause meant to end is 1.1.8 (second picture). Section 23(c) lets Z.-1's definitions and standards be used to read the 149 site-specific provisions (third picture). Section 25.1 keeps bonused lands under Z.-1. Nothing says which by-law governs on a lot under appeal.
Why it matters	Owners and staff need to know which by-law applies to a permit filed this winter. As written, two by-laws stay in use for a decade, with no map of which lots are on which. The end clause switches off the wrong section. Kitchener still has about one property in five on its 1985 by-law. [13]
What I am asking	Correct the cross-reference in 1.1.8(6)(b). Add a map layer for lots still under Z.-1, with a dated review. State that unappealed provisions govern during appeals.
Why	Ottawa repeals its exceptions transition clause, s.110, three years after passage. [12] Hamilton added an end date to its transition clause in 2024. [15] A fixed date and a map settle questions before they reach a counter.

This By-law was passed by the City on [date].

1.1.8 Transition Clauses

Notwithstanding Sections 1.1.2 and 1.1.7 of this By-law, a building permit may be issued in accordance with Section 1.1.8 of this By-law for the following scenarios. For the purposes of determining zoning compliance for matters covered by Section 1.1.8 of this By-law, the provisions of Zoning By-law Z.-1, as amended, as it read on the effective date of this By-law shall apply.

1) Building Permit Applications

a) Nothing in this By-law shall prevent the erection or use of a building or structure for which an application for a building permit has been filed on or prior to [date of By-law approval].

b) Nothing in this By-law shall prevent the erection or use of a building or structure for which an application for a building permit has been filed after [date of By-law approval] where:

I. Planning Act approvals have been obtained in accordance with Subsection 1.1.8 2) or

II. Planning Act applications are in process in accordance with

6) Duration of Transition Provisions

a) Nothing in this By-law applies so as to continue the application of Section 1.1.8, beyond the issuance of the building permit or permits upon which the exemptions are founded.

b) Notwithstanding Section 1.1.9 6) a) above, the provisions of Section 1.1.9 shall no longer apply 10 years after [date of By-law passing].

1.1.9 Repeal of Existing By-law

a) Where a zone has a number label applied, the number refers to a site specific provision that applies to the lands indicated on Schedule A. The provisions of this By-law are modified as set out in that site specific provision, and all other provisions of this By-law shall continue to apply.

b) Uses referenced in this section and not referenced elsewhere in this By-law are not to be construed as different distinct from those uses referred to in the Definitions and Zone Provisions contained in this By-law.

c) The definitions, terminology, and standards of the former Zoning By-law Z.-1 may be used to provide regulatory clarity to the application of Site-Specific Provisions included on the initial passage of this By-law.

d) When a special provision permits a new use in a Neighbourhood

13. Variance monitoring (no clause)

What the draft says	No provision tracks how often a rule needs a minor variance.
Why it matters	A rule that keeps needing exceptions is a drafting problem, but without counts nobody sees it.
What I am asking	Annual variance counts by standard and zone, and a dated report-back before 2030.
Why	Hamilton committed in 2024 to monitor its new regulations for 18 to 24 months and report back on any that keep needing minor variances. [15]

14. ARU caps and the near-campus limit (draft p.63)

What the draft says	Section 3.18.1(a) caps an additional unit at 80% of the main unit. Section 3.18.2 caps bedrooms at two per unit. It also caps them at three across the units attached to the house, and three across the units in an accessory building (five in the Western near-campus area). Both carry forward Z.-1 provisions now under appeal at the Ontario Land Tribunal (OLT-26-000331), with a hearing scheduled for February 17, 2027. [11]
Why it matters	Writing the caps into the new by-law a month before the hearing pre-empts the Tribunal.
What I am asking	Draft these clauses to follow the Tribunal's decision. If the caps stay, apply the 80% limit to detached units only and set a single lot-wide bedroom total. Confirm where the near-campus limit of three bedrooms per unit is carried forward.
Why	The caps are under appeal, so the Tribunal will decide them either way. Carrying them into the new by-law before February invites a second appeal on the same question. If the caps survive, size caps on detached suites are common in other Ontario cities, so the 80% limit fits there. A single lot-wide bedroom total is a simpler rule to apply than a count per unit.

3.18.1 Size and Intensity Regulations

a) The gross floor area of any additional residential unit shall not exceed 80% of the gross floor area of the principal dwelling unit, excluding common or shared utility areas.

b) No additional parking shall be required for an additional residential unit.

c) No new driveway shall be permitted solely for an additional residential unit.

d) An additional residential unit, or any portion thereof, shall not be permitted within a basement where the finished floor elevation is below the elevation of the sanitary sewer servicing the building or structure, unless the unit is serviced by an approved sewage ejector pump or other sanitary servicing system designed and installed in accordance with the Ontario Building Code and all applicable law.

3.18.2 Number of Bedrooms

a) No additional residential unit shall have more than 2 bedrooms.

b) Within the Near-Campus Neighbourhood Western, the number of bedrooms permitted within all additional residential units shall not exceed a total of 5 bedrooms.

c) No more than 3 bedrooms total shall be permitted across all additional residential units attached to the main building.

15. The sixth unit (draft p.142)

What the draft says	A Multiplex stops at five units. A sixth unit makes the building an Apartment, governed by Table 13.9 and permitted in few low-rise zones.
Why it matters	Adding one unit to a five-unit building triggers a rezoning and a different set of rules.
What I am asking	Permit Multiplex up to six units within the same building envelope and the Neighbourhoods place-type permissions.
Why	The building does not change shape, only the count does. Toronto's council narrowed a citywide sixplex plan, so this ask is kept narrow too. [19]

13.3.10 Apartment Regulations

The regulations for apartments in the NR1 and NR2 zones are set out in Table 13.9: Apartment Regulations below.

Table 13.9: Apartment Regulations

Regulations	NR1	NR2
Minimum lot frontage	9.0m or as determined by Section 13.3.3 (1)	9.0m or as determined by Section 13.3.3 (1)
Maximum lot coverage	60%	45%
Minimum height	8.0m	8.0m
Maximum height	34.0m or as shown on Schedule “B” (Special Heights)	21.0m or as shown on Schedule “B” (Special Heights)
Minimum first storey height	4.0m	4.0m
Maximum residential density	200 uph	100 uph
Minimum required front	The lesser of 3.0m or	The lesser of 3.0m or

16. Reasons on the record (no clause)

What the draft says	No staff document explains five choices. They are the 50% first-storey cap, the five-to-six unit line, dropping converted dwellings, the NR1 and NR2 use lists, and the missing rooming houses.
Why it matters	Without a stated reason, a reader cannot tell an omission from a decision.
What I am asking	A stated rationale for each in the January report.
Why	If a choice was deliberate, the reason settles it. If it was not, it gets corrected.

Attachment 3. Sources

The numbers in square brackets in Attachment 2 refer to this list. Links were checked on October 26, 2026. The council-portal links (escribemeetings.com) open in a browser but refuse automated requests.

1. City of London, Draft Zoning By-law ZBL-27, Public Release Draft, September 17, 2026 (File Z-26114). getinvolved.london.ca/download_file/view/2064/559
2. City of London, ReThink Zoning working draft, May 2026. getinvolved.london.ca/download_file/1802/559
3. City of London, Zoning By-law Z.-1, Section 4, General Provisions (lodging house classes and zones). london.ca
4. City of London, Zoning By-law Z.-1, Section 25, Business District Commercial (BDC) Zone (the "existing dwellings" use). london.ca
5. City of London, Municipal Council minutes, July 21, 2026, By-law Z.-1-263466 (parking rate for affordable units; the rate as consolidated in Z.-1 s.4.19(10)(a)(ii), source 3).
6. Ontario Regulation 299/19, Additional Residential Units, section 5. ontario.ca/laws/regulation/190299
7. Ontario Regulation 257/25 (setback tolerance under Planning Act s.34(1.4)), in force November 21, 2025. ontario.ca/laws/regulation/r25257
8. Planning Act, R.S.O. 1990, c. P.13, sections 34(1.1), 34(1.4) and 35.1. ontario.ca/laws/statute/90p13
9. City of Ottawa, staff report ACS2025-PDB-PS-0020, New Zoning By-law, December 1, 2025, Document 2 (table of changes to correct errors) and Documents 4, 14 and 16. pub-ottawa.escribemeetings.com
10. City of Ottawa, New Zoning By-law, Document 15, responses to comments. pub-ottawa.escribemeetings.com
11. Ontario Land Tribunal, case OLT-26-000331, decision of July 27, 2026 (procedural; hearing set for February 17, 2027). omb.gov.on.ca
12. City of Ottawa, Zoning By-law 2026-50, as in the September 2025 final draft, Document 1A (s.801(1) and Table 801A, one "dwelling unit" use capped by density; s.110 transition clause), and the City's notice of enactment. pub-ottawa.escribemeetings.com; engage.ottawa.ca
13. City of Kitchener, report DSD-2024-128 (outcomes of 56 submissions: 55% direct change, 23% no change for insufficient justification), and the City's zoning page (share of properties still under By-law 85-1). pub-kitchener.escribemeetings.com; kitchener.ca
14. City of Guelph, Comprehensive Zoning By-law decision report, April 2023, with its response chart. pub-guelph.escribemeetings.com; response chart
15. City of Hamilton, report PED22154(a), 2024 (end date added to the transition clause; report-back on variances). pub-hamilton.escribemeetings.com

16. City of Toronto, Multiplex Monitoring Report, 2025 (share of permits needing a variance; count and time per variance). toronto.ca
17. City of Toronto, Garden Suites review, 2025 (height limit raised to 6.3 m). toronto.ca
18. City of Toronto, Zoning By-law 569-2013, Chapter 2, section 2.1.2 (prior minor variances carried forward). toronto.ca
19. CP24, "Toronto city council votes to permit sixplexes in nine wards", June 26, 2025. cp24.com
20. City of London open data map services, downloaded October 22, 2026: ReThink Draft Zoning, Addresses, Parcels and Buildings layers; counts are this letter's own, by address point and parcel. maps.london.ca
21. City of Ottawa, New Zoning By-law Draft 2, Document 01, Overview of Changes, March 2025 (provisions reintroduced after being dropped "in error" or as "an oversight"). pub-ottawa.escribemeetings.com