# Strengthening the Core

## Increasing social license for healthy infill development in London, Ontario

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Smart Prosperity Institute

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# Recommendations

In his book, *Collaborating with the Enemy*, Adam Kahane (2017) writes about the "click" people sometimes have when they realize that for a problematic situation to change, they themselves, and not just other people, need to change. We need that "click" to drive better housing outcomes. We need a new approach to collaboration on housing that not only results in more homes being built, but increases rather than decreases, social licence for infill h ousing. In the face of such severe housing affordability challenges, all actors in the housing system need to ask themselves what they can do differently to improve housing outcomes. This includes the private sector, the public sector and non-profit organizations.

The land use planning system in Ontario is designed to be an adversarial system in which those who have interests in property are expected to advocate for their interests, which may be in conflict with each other. On significant land use matters, such as the location of an urban growth boundary, land developers that may otherwise agree on policy may find themselves in conflict with each other. The homevoters that Fischel (2001) describes similarly are expected to mobilize to defend their neighbourhoods against change (K. Einstein, Glick, and Palmer 2020). This adversarial system is not well-suited to the kind of collaborative governance that is needed to build more homes, especially residential infill housing. The following recommendations are intended to help build social licence for residential infill housing in London, Ontario, so we can build more homes, especially for younger generations, while doing so in a way that is climate-friendly and builds, rather than degrades, trust in local government.

## Recommendation #1: A collaborative effort focused on housing

The Whole of Community System Response to Health and Homelessness demonstrates many of the features of a collaborative governance regime: dozens of organizations and hundreds of people attended the summit process and the city has committed to an ongoing whole of community approach (Dickins 2023; Emerson and Nabatchi 2015). Starting and sustaining such a collaborative effort is very challenging. Yet building more homes,

especially residential infill, would benefit from a similarly collaborative approach to systems change. Including the people who are most affected by the housing affordability crisis, especially younger generations, as well as the people who are most likely to oppose infill residential housing, may lead to stronger support for residential infill over time. Although establishing such a collaborative effort would take time and resources, given the scale of the housing affordability challenge and the fractious nature of the current approach, it is worth pursuing.

## Recommendation #2: More permissive zoning for missing middle and mid-rise residential

Through the combination of place types and street types, the London Plan directs greater residential intensification towards parcels located on major streets. But until the zoning by-law is updated to permit the range of missing middle and mid-rise residential buildings envisioned in the London Plan, site-specific conflict on relatively modest residential infill is likely to continue. Building on its move to permit four residential units as-of-right, the City of London should accelerate the comprehensive update of its zoning by-law.

## Recommendation #3: Focusing infill on underutilized lands

As recommended in Helmer (2023), residential infill on commercial properties such as mall parking lots and underutilized municipal or private surface parking lots may generate less opposition than proposals to build on low-density residential lands do. This kind of infill brings homes closer to major employment centres, which has the potential for additional reductions in congestion and commute times, and has the benefit of substantially limiting the disruption from construction to interior renovations.

## Recommendation #4: Infill through conversions

Conversion of vacant or underutilized office buildings to residential, as recommended in Helmer (2023), has the benefit of substantially limiting the disruption from construction to interior renovations. Similar to new buildings on commercial lands or surface parking lots, this kind of infill also reduces the distance between homes and major employment centres.

## Recommendation #5: Following up afterwards

At the time of a residential infill development is proposed, uncertainty and fear, often about property values decreasing or quality of life decreasing, is at a high point. This time period is also the focal point for the municipality in terms of land use policy. Follow up by the municipality *after* developments have been built and occupied, with both the residents of the new homes and the residents of the pre-existing homes, could demonstrate the benefits of residential infill and strengthen support for residential infill overall.

## Recommendation #6: Recognizing and celebrating success

Not all residential infill projects are equal. As in any area of business activity, some businesses are better than others in terms of how they plan buildings, engage residents, build the actual building(s) and, in the case of landlords, maintain those buildings. A meaningful award program designed to recognize exemplary residential infill projects may provide a positive feedback effect that improves how residential infill projects are planned and executed over time. The Urban League of London's Green Umbrella and Green Brick Awards, London Heritage Awards (awarded by ACO London), and the Urban Design Awards (awarded by the City of London) are examples of existing awards that recognize excellent in either environmental contribution or heritage conservation. A new award program focused specifically on residential infill could be a way to recognize and celebrate success in this area.

## Recommendation #7: A focused, proactive strategy for built heritage

Proponents of conserving built heritage often support residential infill proposals on underutilized land or involving adaptive re-use of heritage buildings. However, they are often opposed to residential infill development that is perceived to threaten built heritage resources. A focused, proactive strategy to acquire and conserve built heritage resources, and to encourage their redevelopment as new residential homes, will help to build social licence for residential infill. This strategy could include a dedicated fund for acquiring built heritage resources and/or a program to incentivize the adaptive re-use of built heritage resources for residential purposes, building on the existing city-wide Heritage Community Improvement Plan.

# Key Points from This Report

- This report describes and analyzes 4,059 planning committee decisions in the City of London, over almost 15 years and four distinct municipal council terms, to understand support for (and opposition to) residential infill development. A series of case studies explores examples of both significant opposition (and lack of opposition) to residential infill projects.
- This report recommends a cross-sectoral approach to improving social licence for residential infill development in London, Ontario. Building on the strengths of the Whole of Community System Response to Homelessness in London, a similar collaborative governance approach should be explored for the housing system in London that convenes actors that are often at odds with each other, on specific land use decisions, together to find common ground.
- London's population has boomed over the time period, especially in recent years, when population change has been driven by people moving to London from elsewhere in Ontario (intraprovincial migrants) or directly from other countries (immigrants and net non-permanent residents). Much of this growth has been from people in the Millennial, Generation Z and Generation Alpha cohorts, which concentrates housing demand on the kinds of homes that appeal to couples with kids, singles and roommates.
- Over the time period, Canadian Mortgage and Housing Corporation reports 32,734 new housing starts in London, the majority which, in recent years, are purpose-built rental apartments (~2/3rds of all new homes in 2024 were purpose built rental units).
- As in most urban centres in Canada, London has experienced significant increases in housing costs in both the ownership and rental markets, with the CREA Benchmark Single Family more than tripling, hitting a peak of over $831,300 in January 2022 before declining to $669,400 in January 2025. As of the 2021 Census, 42,015 households in London were living in unaffordable housing, defined as spending more than 30% of their income on housing costs.

- Although residential infill development is often opposed by some residents, and this opposition is covered regularly in local media, planning committee usually decides to support residential infill proposals. Planning committee refuses only 4% of applications.[1]
- Over the time period in which the comments of speakers were recorded in the minutes or in attached documents, 3,297 speakers were recorded speaking to 910 different items. All together, these comments totalled 772,084 words.
- The properties affected by specific land use decisions are spread throughout the city, located in most of the city's dissemination areas (DA) (a low of 72% in 2021 to a high of 82% in 2011). Although not all land use decisions made in the period are captured in the current vacant land inventory, as some land use decisions have translated into homes that have since built on those properties, the total estimated number of residential units in the city's vacant land inventory is 127,551.[2] Roughly 56,878 of those potential new homes (45%) are in the built area of the city, which is the focus of this report. In order to realize the vast potential for new homes in the built area, it is essential to improve social licence for residential infill development.

[1] Over the time period, 67 refusals passed out of 1,816 zoning bylaw amendment (ZBA), Official Plan amendment (OPA) or site plan application (SPA) motions.

[2] As of March 31, 2025.

# Introduction

Canada is facing a housing affordability crisis. Over the past fifteen years, home prices have doubled nationwide[3], putting home ownership out of reach for many Canadians, especially those who were not already in the ownership market. The cost of renting has also increased dramatically and sheltered and unsheltered homelessness is increasing nationwide (Infrastructure Canada 2024), with 40,713 enumerated in the 2022 point-in-time counts.

The Canadian Mortgage and Housing Corporation (CMHC) (2022) has estimated that 5.8 million homes, nationally, need to be built by 2030 in order to address the housing affordability crisis. In "Baby Needs a New Home" (2021) and "Ontario's Need for 1.5 Million More Homes" (2022), Mike Moffatt estimated the demand for housing over a ten year period; in 2024, the estimate was increaed to 1.7 million homes (Moffatt, Hosseini, and Dudu 2024). The Ontario government, and many municipal governments, have established housing targets for 2021 to 2030.[4]

From 2011 to 2021, almost 2 million homes were built throughtout the country, with nearly half of those homes built in the 25 largest cities (Helmer 2023: 8). To achieve the much more ambitious goals set in the past few years, building new homes in the existing built area of cities, residential infill development, will be essential. But proposals for residential infill often encounter local opposition, a phenomenon described as Not In My Back Yard (NIMBY) opposition (Dear 1992). How can we strengthen public support for new housing developments?

Social licence to operate (SLO) is a concept that was introduced by Jim Cooney at a World Bank conference nearly 30 years ago, when he was director of international and public affairs for the Canadian mining company Placer Dome, to explain the "challenge that mining companies face in building relationships with communities located around their projects" (Cooney 2017: 1). It has since been widely used to describe the more than minimum legal permission required, particularly the broad public support required, to mitigate against or reduce political risks for extractive resource projects, which often have very concentrated benefits (to shareholders of mining companies) and concentrated costs

[3] As measured by the Canadian Real Estate Association's Home Price Index for a benchmark single family home, Jan 2010 to Mar 2025.

[4] See the Ministry of Municipal Affairs Housing Progress Tracker (2025).

(specifically, local environmental costs). Why apply the concept of social licence to housing, which differs in so many ways from an extractive resource operation?

Although there are many differences between the two kinds of projects, they share a common thread, which is localized opposition to projects. Sometimes referred to perjoratively as NIMBY-ism, opposition to residential housing projects is common.[5]. The American economist William Fischel (2001, 2005), having observed many planning commission meetings as a member of the commission, hypothesized that it was a concern over the uninsurable risk to the value of their principal asset – their primary residence – that was motivating homeowners to attend local government meetings to oppose projects that they perceived to reduce their property values. Fischel's homevoter hypothesis is the prevailing explanation for the gap in political participation between homeowners and tenants in urban politics; the hypothesis has received substantial empirical support (for a Canadian example, see McGregor et al (2016); in the US context, see, for example, Dispasquale (1999)).

There are many reasons to support residential infill development as a concept. On the climate front, building the 5.8 million homes identified by CMHC as necessary to achieve affordability comes with significant GHG emissions implications. Nationally, if we focus housing growth to prioritize infill rather than our past patterns of development, annual GHG emissions associated with mobility and land use change are estimated to be reduced by **4.5 MT** of $CO_2e$, "equivalent to the annual emissions from more than **1,100,000** gas-powered cars" (Helmer 2023). From an affordability perspective, infill developments avoid the costly new infrastructure required to support greenfield developments. And from a health perspective, beyond the pollution avoided from mobility emissions, building infill in areas with better active transportation and transit infrastructure can promote a greater number of active transportation and transit trips, which is associated with health benefits.[6] Hwang et al. (1999) provide a conceptual model for understanding the complex relationships between socioeconomic status, housing status and health status and other research has explored the connection between homelessness and health (Hwang 2004), housing and children's health (Cooper 2004) and housing as a social determinant of health (Bryant 2004). In the London context, health has been explicitly linked with homelessness in the city's whole of community system response (Graham and Meyer 2025; Dickins 2023).

When infill residential development moves from concept to reality, it often encounters the kind of opposition observed by Fischel (2001, 2005). In the US context, Einstein et al (2020) have studied who participates in public hearings related to planning issues. They find that

[5] See, for example, Maloney (2013b, 2013a, 2017); De Bono (2024); Stacey (2019b, 2019a); (Moulton 2025)

[6] See, for example, the health benefits calculated in the business caase for the City of London's bus rapid transit project (IBI Group 2017).

the people who participate are not only not representative of the overall population — disproportionately male, homeowners and older than 50 — but also disproportionately **opposed** to new housing developments.[7]. Recent Canadian research focused on Calgary, which combines property value assessments and individual survey data, has shown that perceptions and actual changes in home values are significant factors affecting homeowner (but not renter) satisfaction with incumbent municipal politicians (Anderson, Lucas, and McGregor 2024).

How can we build more infill housing while strengthening rather than degrading social licence for infill housing? That is the question this report explores in the context of London, Ontario.

The report proceeds in three parts. First, the socioeconomic context for London, focusing on income, housing and migration. How has the city's population changed? What kind of housing is available in London and what kinds of households live in those homes? Second, how has the private sector responded to this demand for housing? What kind of housing has been built? Third, what kinds of land use decisions has city council made over the past 15 years? What is the nature and extent of support or opposition to different kinds of residential infill? To explore these questions, the report presents data, assembled from the minutes of 275 planning committee meetings, covering thousands of committee decisions over the time period, on both the overall sentiment and specific types of emotions expressed during public participation meetings. Next, through a series of case studies, the report explores what we can learn from different kinds of residential infill projects, some of which face opposition and some of which do not. Finally, the report concludes by situating the report's findings and recommendations in the contemporary context of London's housing system.

[7] For other research on related topics, see (K. Einstein 2021; K. Einstein, Glick, and Palmer 2023; K. Einstein, Ornstein, and Palmer 2023; K. Einstein and Willison 2025)

# System context for housing in London

Emerson and Nabatchi's (2015) integrative framework for collaborative governance describes six elements of system context that affect how likely a collaborative governance regime is to form: public services and resource conditions, policy and legal frameworks, socioeconomic conditions, network characteristics, politics and power dynamics and history of conflict. They argue that collaborative governance regimes, where cross-boundary collaboration is the prevailing pattern of behaviour, are more likely to form in certain system contexts than others. Although the focus of this study is not directly on collaborative governance, describing two of the key elements of the system context — socioeconomic conditions and policy and legal frameworks — is helpful in understanding the context within which London's city council is making decisions on proposals for infill residential development.

## Socioeconomic conditions in London

London is a mid-size city in the heart of Southwestern Ontario, a region of more than 2.5 million people. As the largest city in the region, it is now home to 488,640 people and is one of the fastest-growing cities in the country.[8] Its economy is diversified, with significant employment in advanced manufacturing, health care, technology and construction.[9] It is home to Western University, King's University College, Huron University and Fanshawe College, which draw students from other parts of the province, country and the world.

Median total individual income was $39,600 in 2020, varying considerably throughout the city, from a low of $21,400 to a high of $75,000. Table 5 provides more details on incomes and Figure 1 shows the spatial distribution of median income at the dissemination area level, which is the lowest geographic level census income data are published.

[8] Source: Statistics Canada. Table 17-10-0155-01, Population estimates, July 1, by census subdivision, 2021 boundaries DOI: https://doi.org/10.25318/1710015501-eng

[9] For more on London's labour market and medium-term outlook in these sectors, see Helmer and Moffatt (2023)

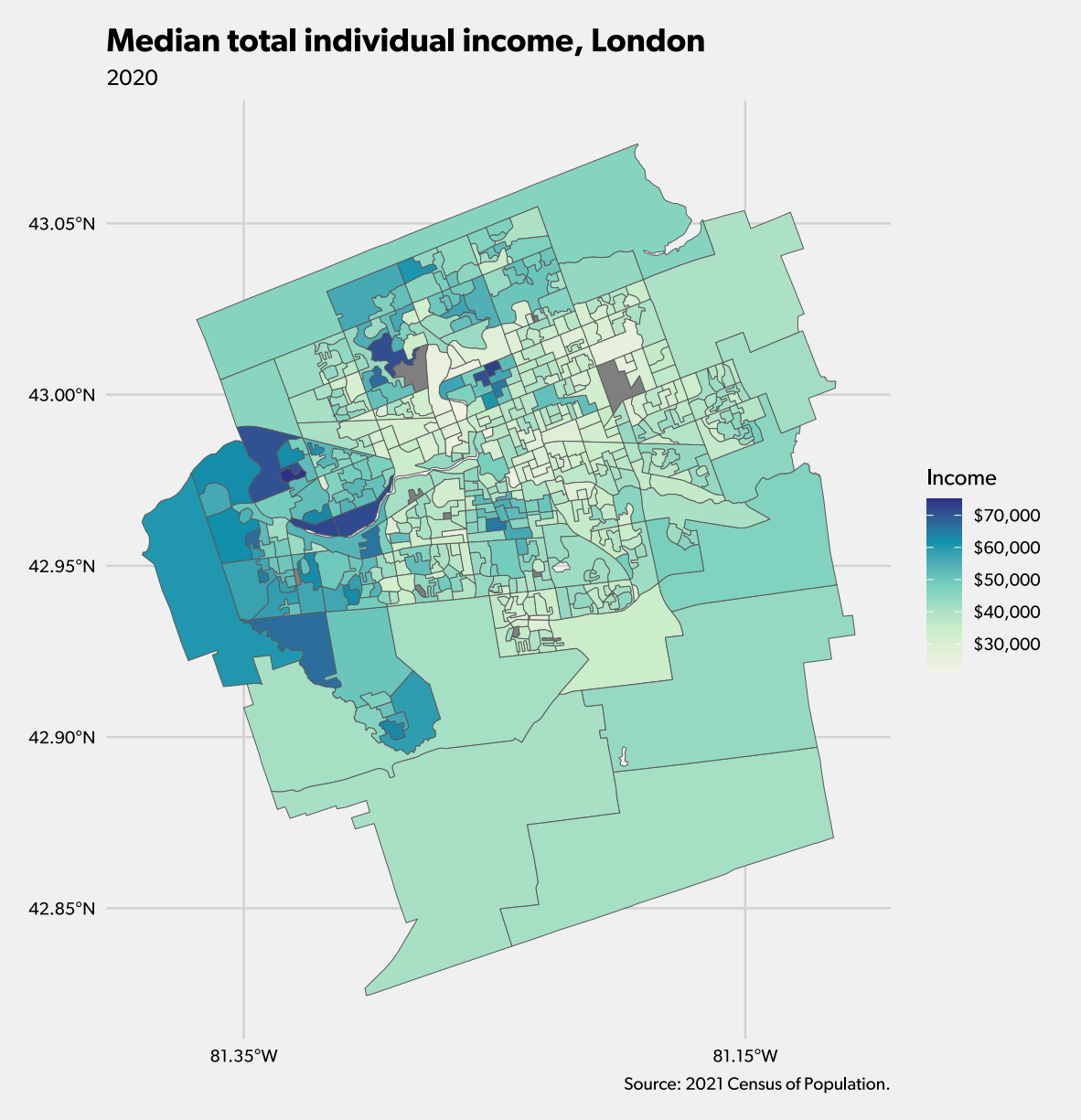


Figure 1: Median total individual income, 2020, City of London

## Population change

Between 2016 and 2021, London was one of the fastest-growing cities in the country, adding more than 38,502 people, representing a growth rate of 10%. Figure 2 shows the components of population change by broad age groups for the Middlesex Census

Division, which includes the City of London and the muncipalities in Middlesex County.[10] Understanding the age profile of migrants is important, as headship rates, which are important in estimating household formations, vary by age (Moffatt 2021; Moffatt, Hosseini, and Dudu 2022: 7-10)

## Immigration

Direct immigration to London has been a consistent and increasing source of population growth, peaking at 7,074 in 2021/2022 and staying elevated at approximately triple the levels of growth from 2010-2015. As shown in Figure 2, most immigrants are prime working age, 25-44 years old, and their children.

## From other provinces

On net, London was losing people to other provinces – interprovincial migrants – in the early period, hitting a local maximum of -1,014 in 2012/2013. The trend reversed in 2016 and stayed a source of population growth, primarily from prime working age people and their children, before becoming a net loss again in the most recent three years, hitting a maximum loss of -1,082 people in 2022/2023.

## From elsewhere in Ontario

Movers from elewhere in Ontario have been a consistent source of population growth for the past 15 years, peaking at 4,487 in 2021/2022. That high level of population growth has collapsed in the last two years of the period, falling to more typical levels. As with immigrants, the majority of these movers are prime working age or children, but the age profile is a bit older.

## Net non-permanent residents

London saw a steady increase in net non-permanent residents, which includes refugees, international students with a study visa and temporary foreign workers, over the first five years (2010-2014). But it started to increase rapidly thereafter, reaching a high of 13,014 in 2022/2023, almost double the highest year of growth from direct immigration of

[10] Source: Statistics Canada, Table 17-10-0153-01. For more on the methodology for population estimates, see https://www23.statcan.gc.ca/imdb/p2SV.pl?Function=getSurvey&SDDS=3608

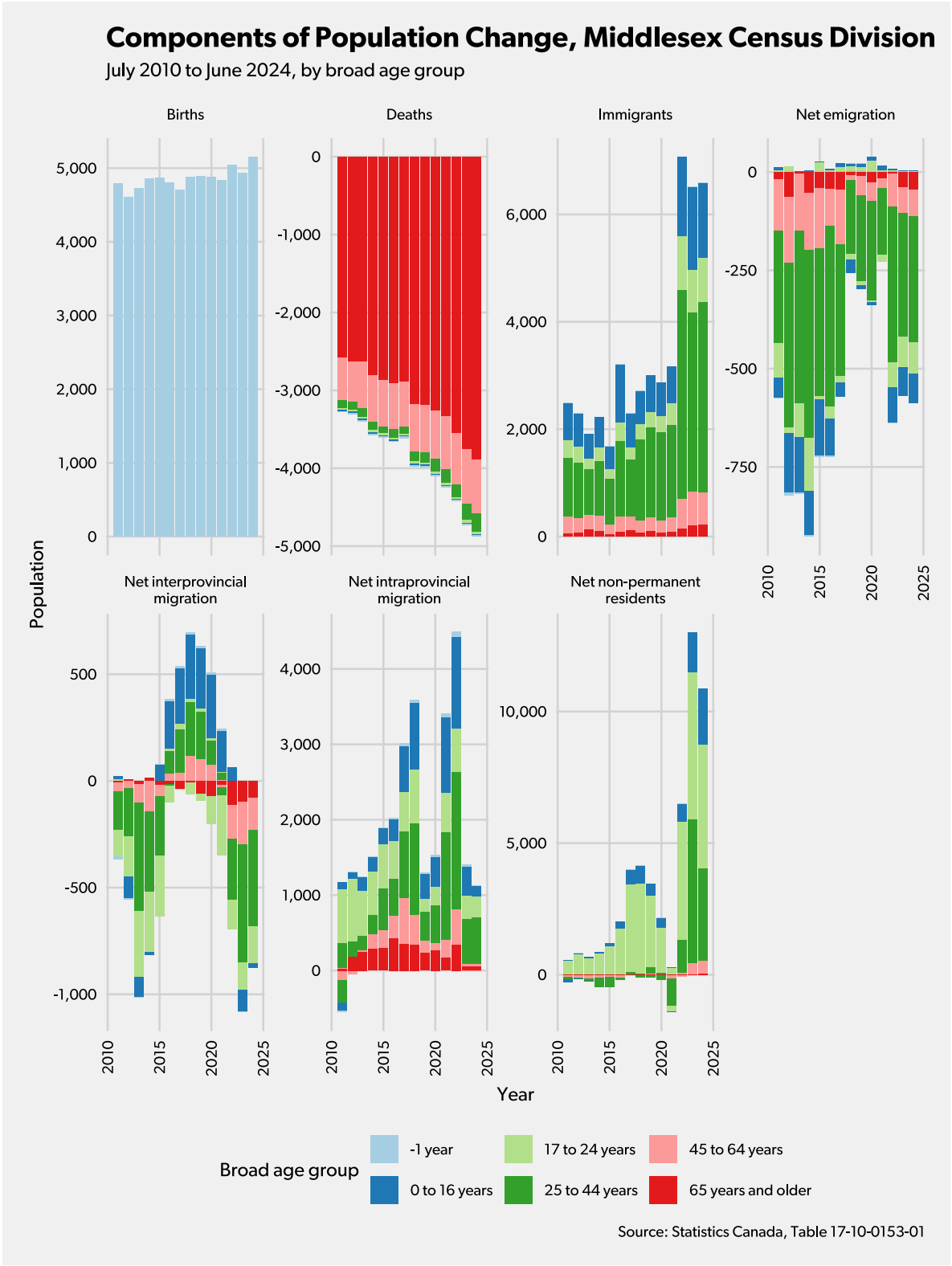


Figure 2: Components of population change, July 2010 to June 2024, by broad age group.

permanent residents. Unlike intraprovincial migrants and immigrants, the age profile of these new residents is much younger, with the majority in the prime post-secondary years, 17 to 24 years old. The age profile of net non-permanent residents has shifted to include more 24 to 44 year olds in the most recent two years, perhaps as a result of the influx of Ukrainian refugees displaced by Russia's war. Figure 33 shows the details of this rapid change in the age profile of net non-permanent residents.

## Change in university and college enrolment

As a university and college city, London benefits from the economic and social activity of tens of thousands of university and college students who live in the city, on-campus or off-campus. Some of these students grew up in London, but many of them move to the city to study and reside in the community while they are studying. The student population present during the academic year is underrepresented in census population estimates, since the census records Canadian students who have a primary residence elsewhere in Canada at that primary residence address rather than their residence in London. Fortunately, full-time enrollment statistics for the key post-secondary institutions in London – Western University, King's University College, Brescia University College, Huron University and Fanshawe College – are available for most of the years in the time period (Council of Ontario Universities 2024; Government of Ontario 2024).[11] As shown in Figure 3, overall enrolment has increased over the time period. For Western, domestic student full-time enrolment has increased from 25,712 in 2010 to 33,907 in 2022, with most of the growth from domestic students. At Fanshawe College, however, the trend is different, growing from 14,228 in 2012 to 22,697 in 2023, with Fanshawe's international student full-time enrolment passing Western's in 2017 and slightly exceeding Fanshawe's domestic full-time student enrolment six years later.

## Households and dwelling types

As of 2021, 55% of all dwellings in the London Census Metropolitan Area (CMA) — 122,265 homes out of 222,240 — were single detached. Just over one-quarter are apartments, with buildings with five or more storeys (38,340 total units) being the dominant kind, ahead of buildings with fewer than five storeys (22,505 units) and duplexes (5,245 units). Just under one-fifth of the housing stock is either row house (24,860 units) or semi-detached (8,200 units). Figure 4 shows what kinds of households are living in what kinds of homes.

[11] Some of the earlier years are not included for Fanshawe College; some of the more recent years are not included for the universities. Bresica University College was absorbed by Western University in May 2024.

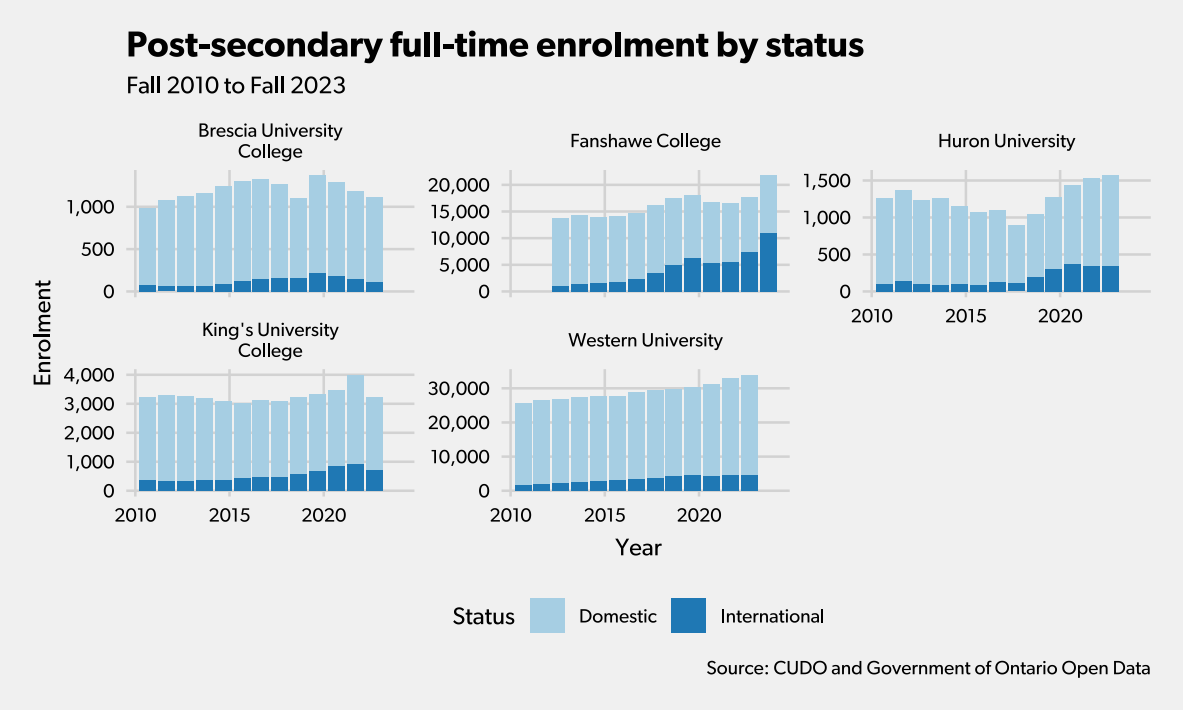


Figure 3: Full-time Fall enrolment, key post-secondary institutions, Fall 2010 to Fall 2023.

Different households and families have different preferences when it comes to the kind of housing they live in. The three most numerous types of households in London CMA are one person (65,265 households), couples with kids (56,510 families) and couples without kids (55,655 families). The remaining types of households include one parent families (21,165 families), multigenerational (5,090 families), multiple families (965 families), one family with additional people (6,085 families) and two or more people who are not in a family (11,505 households).

Families have different needs and occupy different housing types in different proportions. Families with children occupy high-rise apartments at relatively low rates, and one-person households occupy a more diverse range of housing options.

## One-person households

Perhaps counter-intuitively, one-person households in London CMA are just as likely to be in single detached homes (33%) as in taller apartment buildings (31%). However, many of these one-person households are widows or widowers. Shorter apartments (19%) and

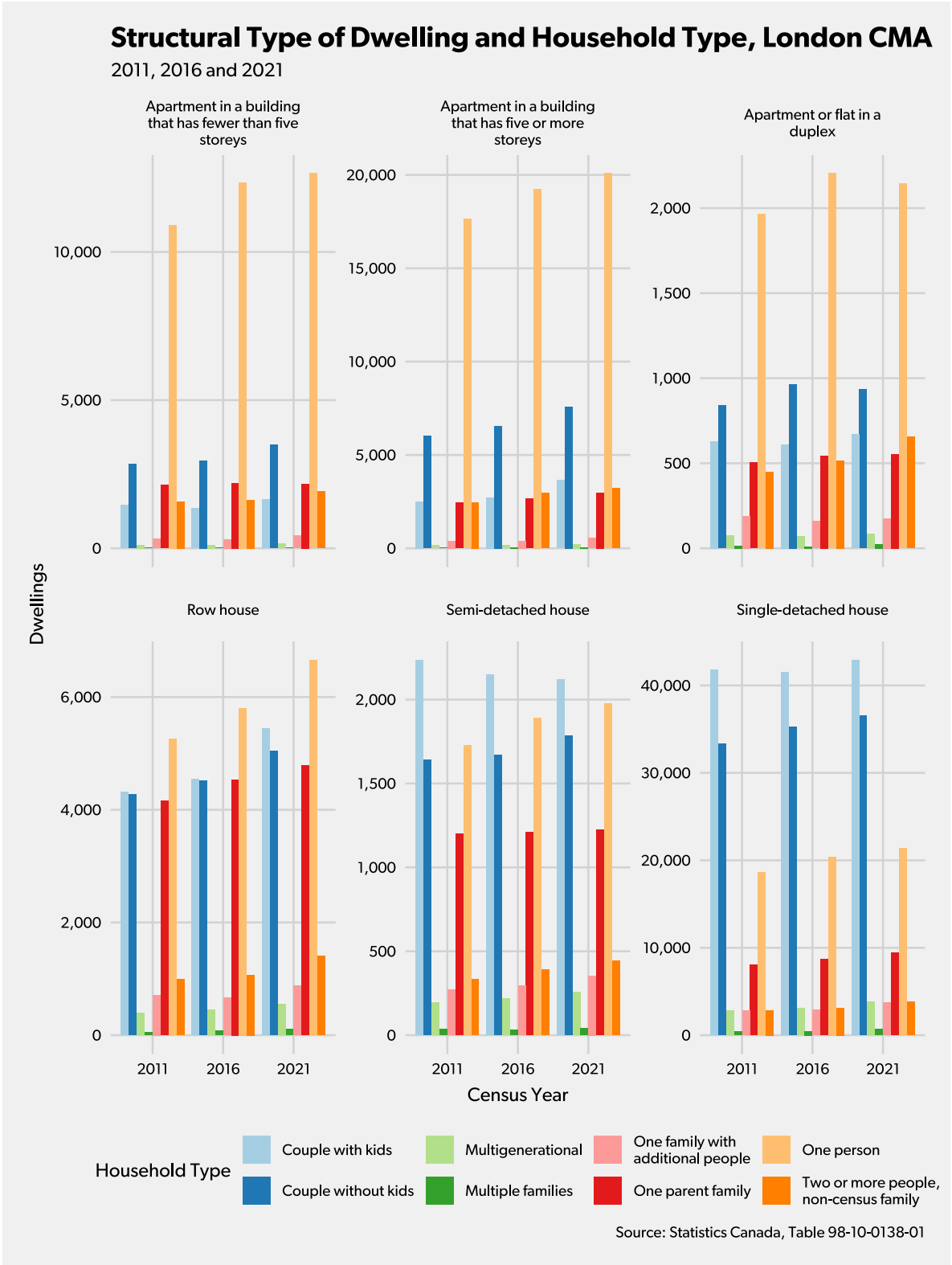


Figure 4: Structural type of dwelling and household types, London (CMA), 2011, 2016 and 2021. Source: Census of Populaton.

row houses (10%) are the next most common types of dwellings, followed by duplexes (3%) and semi-detached homes (3%).

## Couples with children

Just over three-quarters of all couples with children in London CMA live in single-detached homes (76%). Half of the remaining one-quarter of couples with children live in row houses (10%), and the rest live in 5+ storey apartments (6%), semi-detached homes (4%), less than five storey apartments (3%) and duplex apartments (1%).

## Couples without children

Roughly two-thirds of couples without children live in single-detached homes (66%). Compared to couples with children, it is much more common for these households to live in apartments, whether taller (14%), shorter (6%) or duplexes (2%). The proportion of these households living in row houses (9%) and semi-detached homes (3%) is similar to the rate for couples with children.

## Single parents

Single-detached homes account for the most significant proportion of single-parent households (44%). However, row houses are much more common for single-parent households than they are for any other kind of household (23% of single-parent households compared to a range of 10%-15% for other types of households). A relatively high proportion of single parents live in taller apartments (14%) and smaller apartments (10%), with the remaining living in semi-detached (6%) or duplex apartments (3%).

## Roommates

More than 4 in 10 roommate households (two or more people not in a census family) live in apartments (43.1%): taller apartments (28%), shorter apartments (17%) and duplexes (6%). One in eight live in row house (12%).

Interestingly, roommate and one-person households combined account for almost two-thirds of all households in taller apartments (61%) and more than half of shorter (65%) and duplex apartments (53%).

## Multigenerational families

Accounting for a similar proportion of the population as roommate households, multi-generational families live predominantly in single-detached homes (75%). Generally, and consistent with expectations given the greater average size of the families, the distribution of these families is very similar to couples with children.

## Other types of households

The remaining types of households include one family with additional people and multiple families. Together, they account for roughly 3% of all households in London CMA. For both types of families, single-detached homes are the most common (61% for one family plus additional and 75% for multiple families).

## Housing tenure

As counted during the 2021 census, more than 101,600 households own their housing, accounting for 58% or all households; more than 73,000 households rent their housing, plus the households comprising students who are renting but are counted in the census at their principal residence in another municipality. Figure 5 shows the spatial distribution of rental households at the dissemination area level. The highest shares of renter households are located downtown and in areas close to the universities and college.

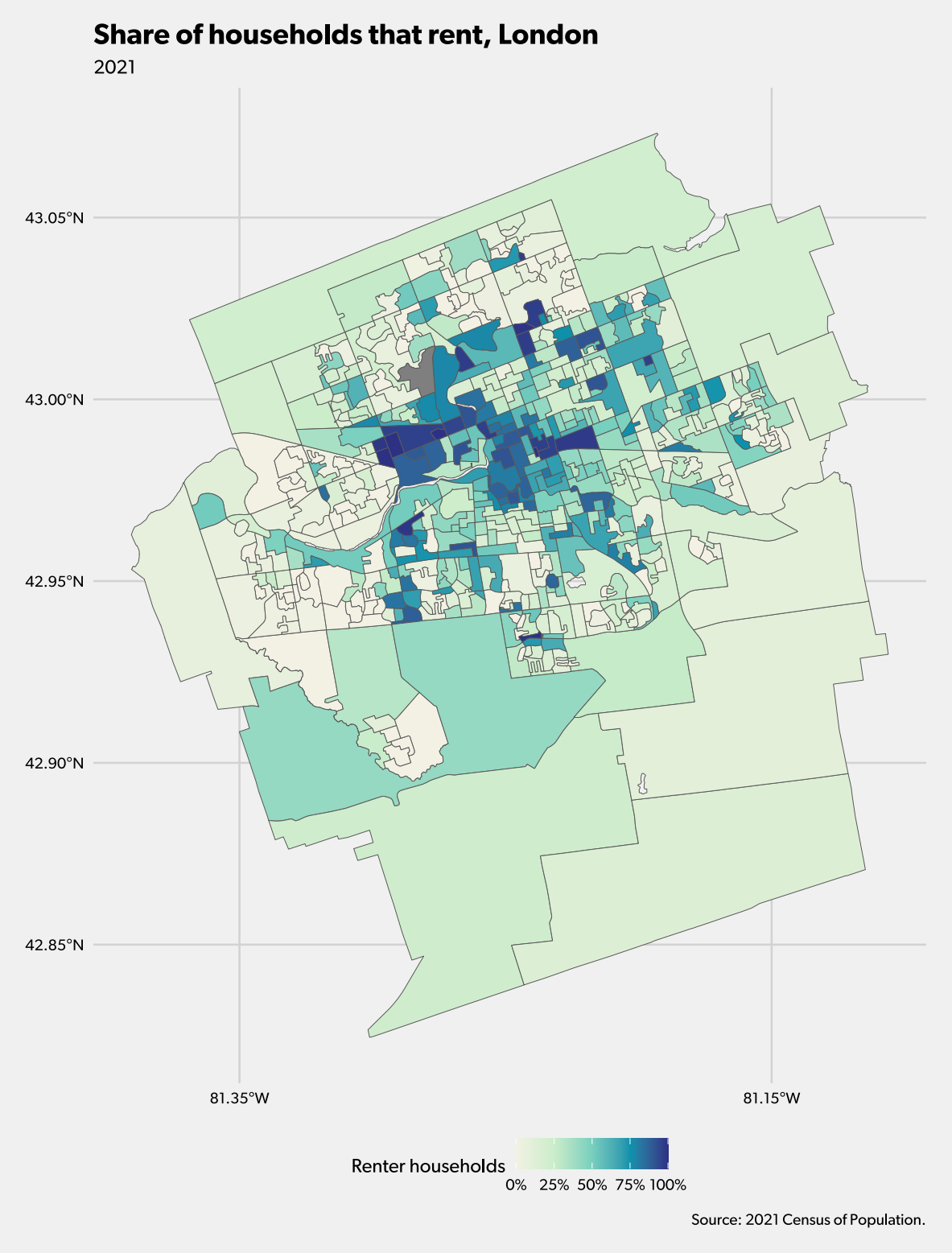


Figure 5: Share of households that rent, 2021, City of London.

# Policy and legal frameworks and key governance actors

David Hulchanski (2006: 239) describes Canada's housing *system* as having two parts: a **primary** part for most home owners and high-income renters; and a **secondary** part for other renters and some rural and low-income home owners. He argues that the primary part of the housing system is an aspect of Canada's social security welfare state, where benefits are universal and earned as entitlements or rights, while the secondary part is an aspect of the social assistance welfare state, in which benefits are selective and means-tested (2006: 239). This dual concept of Canada's housing system is a helpful for understanding how and why different levels of government intervene in the housing system.

Martin Horak (2024, 2012) articulates a model for understanding multi-level governance in Canada. In this model, four types of actors — federal government, provincial governments, local governments and non-governmental actors, which include non-profit and business actors — can take on four different roles: *policy advocacy*, *resource provision*, *policy development* and *implementing* policies (Horak 2024: 115). Depending on the policy domain and time period, we observe different combinations of actors and roles and different *modes* of governance: negotiation, co-production or metagovernance.

## Federal government

All levels of government, the private sector and non-profits are involved in Canada's housing system. The federal government, through tax policy and the CMHC, has long been involved in the primary part of the system (2006). In recent years, since the launch of the National Housing Strategy in 2017, the federal government has become much more involved in the secondary part of the housing system (Ministry of Children Families and Social Development 2017), including funding non-market housing projects. More recently, the federal government has exempted purpose-built rental housing from the GST, as recommended in the National Housing Accord (Richter, Moffatt, and Brooks 2023) and launched the Housing Accelerator Fund (HAF) to incentivize municipalities to allow for more permissive land use regulations, especially near frequent transit service and major destinations like post-secondary institutions (CMHC 2025). These incentives to encourage policy changes at the local level without imposing changes are an example of what Horak refers to as *metagovernance*, citing Taylor (2021). Crucially, as a policy implementer, the federal government sets targets and manages both immigration and the migration of non-permanent residents, which are key drivers of population change and housing demand.

Locally, the area has been represented at the federal level by Members of Parliament from three political parties: Liberals Peter Fragiskatos (2015-), Glen Pearson (2006-2011), Arielle Kayabaga (2021-) and Kate Young (2015-2021); Conservatives Susan Truppe (2011-2015),

Ed Holder (2008-2015), Karen Vecchio (2015-2025), and Joe Preston (2004-2015); and New Democrats Irene Mathyssen (2006-2019) and Lindsay Mathyssen (2019-2025).

## Provincial government

At the provincial level, in addition to setting housing supply targets, the province has introduced the Building Faster Fund, which provides a municipality that achieves at least 80% of its annual housing supply target with funding to support its housing goals (Ministry of Municipal Affairs and Housing 2025). Through provincial legislation, including the *Municipal Act*, *Planning Act*, *Development Charges Act* and the *Housing Services Act*, the province also shapes the responsibilities and powers of municipalities when it comes to land use planning, growth infrastructure and social and community housing. In recent years, the province has issued a series of Housing Action Plans, reforming land use planning and allowing, for example, three residential units as-of-right on residential parcels zoned for single detached housing.

Locally, the area has been represented at the provincial level by Members of Provincial Parliament from three political parties: Liberals Deb Matthews (2003-2018), Khalil Ramal (2003-2011), Chris Bentley (2003-2013) and Steve Peters (2003-2011); Conservatives Rob Flack (2022-) and Jeff Yurek (2011-2022); and New Democrats Terence Kernaghan (2018-), Peggy Sattler (2013-) and Teresa Armstrong (2011-).

## Municipal government

The Institute on Municipal Finance and Governance's Who Does What Series describes the municipal role in housing, including market and non-market housing and homelessness prevention services (Atkey et al. 2022). In Ontario, municipalities have a significant role when it comes to social and community housing, especially municipalities like London, which are designated as service manager under the *Housing Services Act* and are the shareholders of significant community housing providers.[12] Municipalities are responsible for developing official plans, which must be approved by the province, and local zoning rules that regulate what kinds of buildings can be built where and what kinds of activities can be undertaken in those buildings. In terms of growth infrastructure, municipalities also develop long-term forecasts for growth, which are used to inform official plans and development charges, which are per unit charges collected from builders of new housing (per

[12] In London, this organization is London Middlesex Community Housing, which provides more than 3,200 units of community housing in the region.

square foot for other kinds of new buildings). This report focuses on the municipal role in land use planning.[13]

Over the course of the time period, 35 different people have served full or partial terms as members of the municipal council, which comprises 14 councillors elected in wards and a mayor elected at-large. Five of those 35 people have served as mayor: Joe Fontana (2010-2014), Joni Baechler (2014), Matt Brown (2014-2018), Ed Holder (2018-2022) and Josh Morgan (2022-).

Four land use related initiatives at the municipal level are important context for council decision-making on land use planning. The first is the London Plan, the city's official plan, which the process for which started in 2012 as Rethink London and was ultimately approved by municipal council and the provincial government in 2016. Although the plan was approved in 2016, it was not in full force and effect until all appeals were resolved through an Ontario Land Tribunal decision on 25 May 2022. The plan, which introduced the concepts of place types and street types, placed a higher priority on intensification and infill development than the previous, 1989 Official Plan. It integrates land use and mobility planning, with rapid transit corridors and transit village place types identified for significant intensification. The second is the related, and ongoing, Rethink Zoning process, which is a comprehensive update to the Zoning By-law.[14] The third is the the provincial housing target for London of 47,000 new homes over 10 years. Fourth, is the city's agreement with the federal government related to the Housing Accelerator Fund (HAF), which is intended to accelerate the pace of housing development in the city. The city has since acted to increase the heights allowed in some place types and amended the zoning by-law to allow for four residential units as-of-right on residential parcels zoned for single detached housing (the primary unit plus three additional residential units).[15]

## Non-government actors

As the largest city in Southwestern Ontario, London has a sophisticated set of private sector and non-profit actors involved in the housing system. The London Development Institute (LDI) represents the interests of land developers in the region.[16] The London Home Builders Association (LHBA) represents the interests of home builders, renovators and other

[13] For more on the challenge of growth forecasts not being updated to reflect policy changes and observed population changes, see Moffatt (2022).

[14] For more on Rethink Zoning, see https://getinvolved.london.ca/rethink-zoning

[15] For more on the city's actions related to the Housing Accelerator Fund, see https://london.ca/business-development/more-homes.

[16] Most but not all major land developers are members of the London Development Institute. For more on LDI, see https://londondev.ca

businesses involved in home building.[17] Some of the largest developers and builders in the region include Tricar Group, Auburn Developments, Drewlo Holdings, Sifton Properties, York Developments, Old Oak Properties, Bluestone Properties, Esam Group, Medallion Corporation, Westdell Development, Ironstone Building Company and Wastell Homes. Farhi Holdings Corporation is also major land developer with substantial land holdings in the downtown. Many older apartment buildings are owned by Real Estate Invesment Trusts (REITs) like Hazelview Properties, Minto Apartment REIT, Canadian Apartment Properties REIT.

The London Community Foundation is a non-profit organization that supports community development and social innovation in the region, including affordable housing initiatives, and is the host organization for the Fund for Change, a fund focused on supporting the city's Whole of Community System Response to Homelessness, which was started by an anonymous donor family with a $25 million donation and commitment to match up to $5 million in other donations to the fund.[18] Many non-profit organizations provide affordable or non-market housing in the community, including the partners in Vision SoHo, a multi-stakeholder re-development of the old Victoria hospital lands intended to provide 370 units of affordable housing. Partners in that project include the London Affordable Housing Foundation, Zerin Development, Residenza Affordable Housing, Indwell, Chelsea Green Homes Society and Homes Unlimited (Baleeiro 2024). Most of the city's homelessness prevention and housing support services are delivered by non-profit or charitable organizations like the Unity Project for the Relief of Homelessness. Some of these organizations participate in the London Homeless Coalition, which is a open network of individuals focused on advising, shaping and coordinating the local response to homelessness.

The Urban League of London (ULL) is a non-partisan umbrella organization of more than 20 neighbourhood associations within the city. Although neighbourhood associations often weigh in on local land use planning matters, the Urban League of London focused more on city-wide land use issues.[19] Among other goals, the organization has a strong view on public participation: "We advocate for greater and more meaningful citizen participation in the public affairs of the city. To make this possible, the City of London must conduct its business in an open, transparent and accountable way." Two ULL members later served as Mayor of London: Jane Bigelow and Joni Baechler.

[17] For more on the London Home Builders Association (LHBA), see https://www.lhba.on.ca/en/.
[18] For more on the Fund for Change, see https://www.lcf.on.ca/fund-for-change and Richmond (2023).
[19] For more on the Urban League of London, see https://www.urbanleaguelondon.ca/.

# Housing affordability and growth in London, 2010-2025

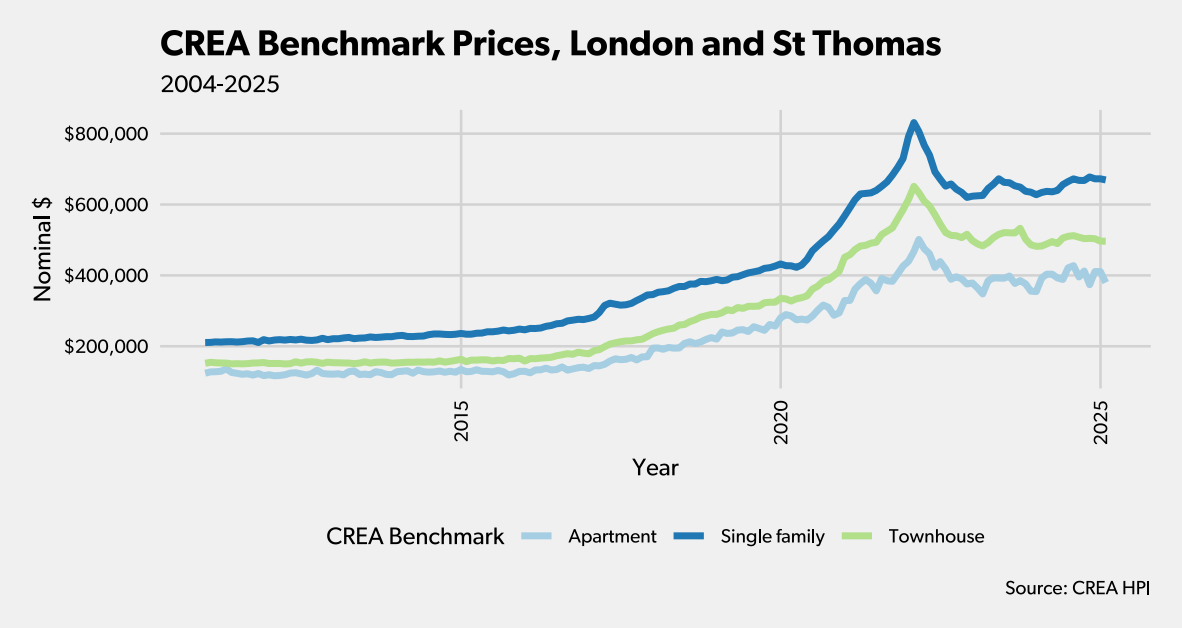


Figure 6: Canadian Real Estate Association Home Price Index, Benchmark Prices, Dec 2004-Feb 2025.

## Home prices, 2010-2025

The vast majority of housing built in London is built by the private sector, whether it is market housing or non-market housing. Usually taking a long-term view, land developers buy land, re-zone it, subdivide and service it and either build homes on the land directly or sell parcels to home builders. Building new homes is a multi-year effort involving a complex web of private sector, public sector and non-profit actors (especially in the case of non-market housing). All of these actors face uncertainty and challenges in forecasting what housing demand will be, whether they are forecasting later in the current year or farther into

the future. In addition to this uncertainty, factors like increases or decreases in the Bank of Canada's policy rate, which affects not only the interest rates for mortgages taken out by the buyers of new homes, but also the cost of borrowing for developers, builders and others who are financing new home construction. Ultimately, while the municipality controls "what gets built where" through zoning (Trounstine 2018), homes are built (or not built) by businesses in the private sector and those businesses are operating in a challenging and uncertain environment.

As shown in the breakdowns of household types by type of dwelling, the specifics of population change and household composition matter in terms of housing preferences and the level of demand for different types of housing. Across the three main types of homes tracked by the Canadian Real Estate Association (CREA)'s Home Price Index (HPI) – single family, townhouse and apartment – prices for benchmark homes in the London and St. Thomas real estate board have increased dramatically since 2015. The price of the benchmark single detached home has increased from $234,000 in Jan 2015 to $669,400 ten years later in Jan 2025. Figure 6 shows the rapid rise in home prices within the ownership market, which includes new and resale homes.

Another way of understanding home prices is to look at the price of new homes that are constructed. Statistics Canada's New Home Price Index (NHPI) tracks units with similar features over time to construct an index for the cost of land and the new house that is constructed on that land.[20] Through this measure, plotted in Figure 7, we can see that the index for new homes increased steadily between 2010 and 2017, accelerating after that and peaking at 156 in May 2022, shortly after the Bank of Canada started to increase its policy rate to bring inflation closer to its target. That's a 56% increase in just over six years. Figure 7 shows how the price index for the house component of new housing ("House only") has increased much more rapidly than the price index for the land component ("Land only").

The city's annual survey of resident satisfaction shows an increasing concern about housing availability and affordability over the past decade. In 2015, housing was not identified as a top area of concern. However, dissatisfaction with social and affordable housing was relatively high, compared to other areas, at 28% of respondents (Ipsos Reid 2015: p. 21). In 2024, dissatisfaction with social and affordable housing had increased to 79% and housing availability and affordability was one of the top contributors to poor quality of life identified by respondents (Forum Research Inc 2024: p. 24, 33).

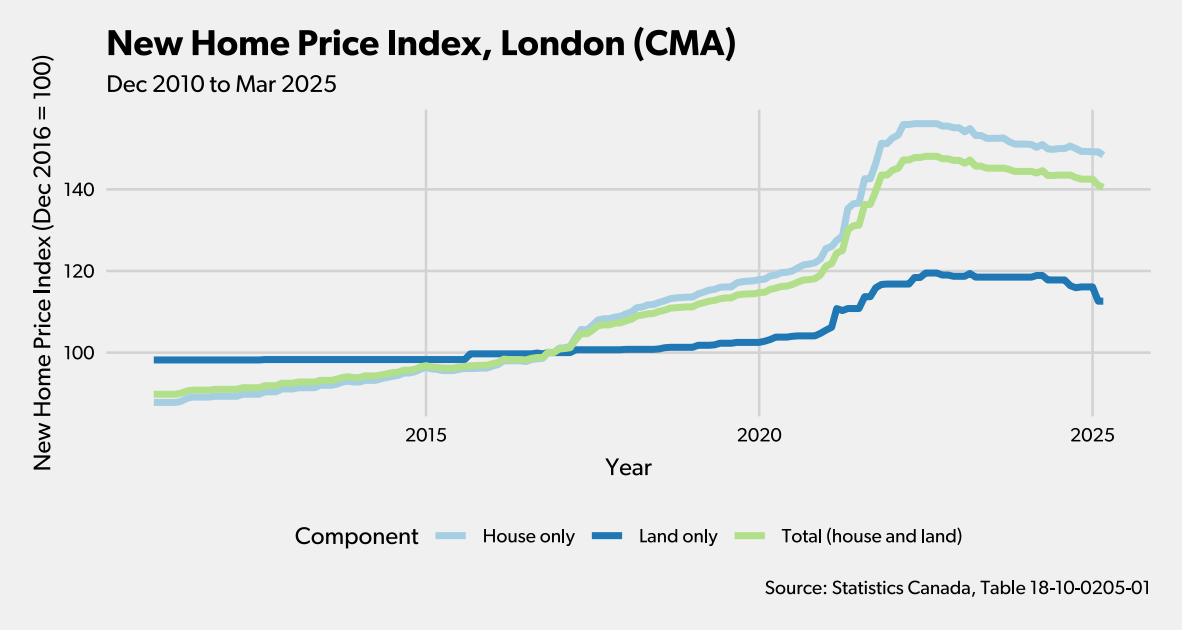


Figure 7: New Home Price Index, Dec 2004-Feb 2025

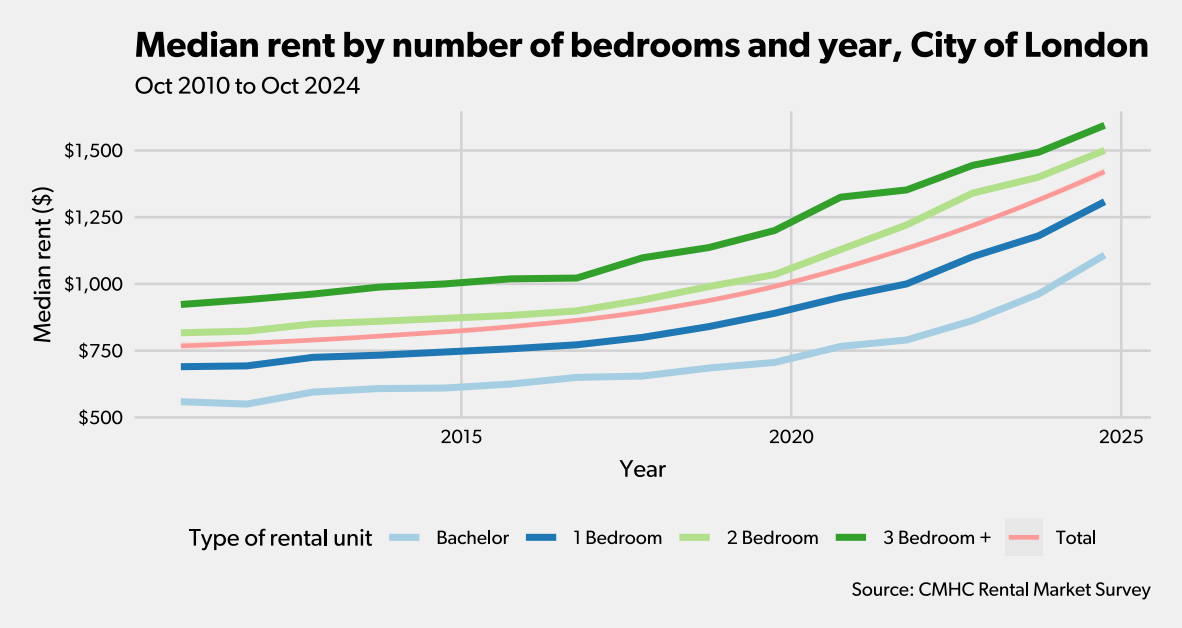


Figure 8: Median rent by number of bedrooms, City of London, Oct 2010 to Oct 2024

## Change in rent, 2010-2024

The trends are similar in the rental market, but without the decline observed in recent years in the price of homes.[21] CMHC's Rental Market Survey provides time series data by number of bedrooms. From Oct 2010 to Oct 2024:

- Median rent for all bedroom types has increased from $765 to $1,423 (+86%).
- Median rent for bachelor units has increased from $559 to $1,108 (+98%).
- Median rent for one bedroom units has increased from $690 to $1,308 (+90%).
- Median rent for two bedroom units has increased from $817 to $1,500 (+84%).
- Median rent for units with 3 or more bedrooms has increased from $923 to $1,594 (+ 73%).

As shown in Figure 5, rental units are spatially concentrated in the core and near the universities and colleges. Figure 39, in the Appendix, plots median rent for for 2 bedroom units (the most common in the rental housing stock) by census tract and year.

## Change in vacancy rate, 2010-2024

Given high levels of population growth in key renter demographics and rapidly increasing median rents, vacancy rates have plummeted. From Oct 2010 to Oct 2024:

- The vacancy rate for all bedroom types has decreased from 4.80% to 2.70%.
- The vacancy rate for bachelor units has decreased from 4.30% to 1.40%.[22]
- The vacancy rate for one bedroom units has decreased from 3.60% to 2.80%.
- The vacancy rate for two bedroom units has decreased from 5.60% to 2.80%.
- The vacancy rate for units with 3 or more bedrooms has decreased from 4.70% to 1.30%.

[20] For more on the methodology of the NHPI, see https://www23.statcan.gc.ca/imdb/p2SV.pl?Function=getSurvey&SDDS=2310

[21] Unlike home prices, rents are regulated by the Province of Ontario, which limits increases to a guideline percentage increase, linked to inflation, for current tenants only. Through vacancy decontrol, when a tenancy ends, a landlord can set the rent for the new tenant at the going market rent, unconstrained by the rent guideline. In 2018, the provincial government also exempted any new rental units occupied after 15 November 2018 from rent regulation.

[22] In October 2023, as October 2024 data are not available.

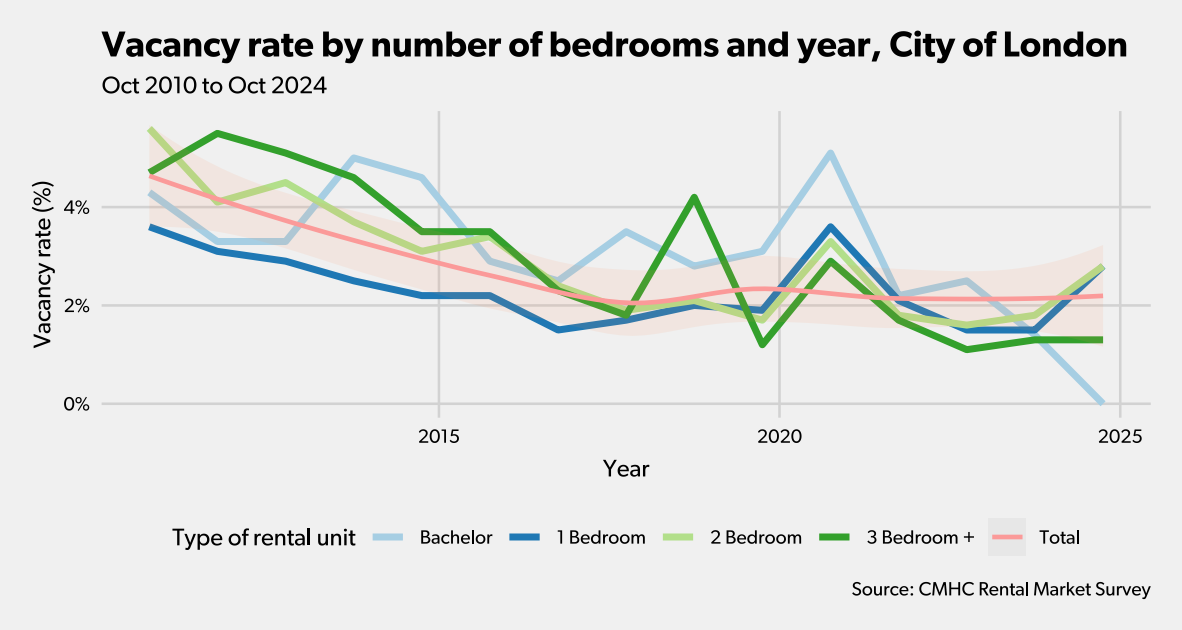


Figure 9: Vacancy rate by number of bedrooms, City of London, Oct 2010 to Oct 2024

Generally, the greater the number of bedrooms, the more significant the decline in the vacancy rate, with units with three or more bedrooms dropping the most of all bedroom types. Overall, these units are a small proportion of the overall rental universe, so there are very few vacant units that would meet the needs of families looking for three bedrooms.

As shown in Figure 5, rental units are spatially concentrated in the core and near the universities and colleges. Figure 40, in the Appendix, plots vacancy rates for 2 bedroom units (the most common in the rental housing stock) by census tract and year.

## Housing starts, 2010-2025

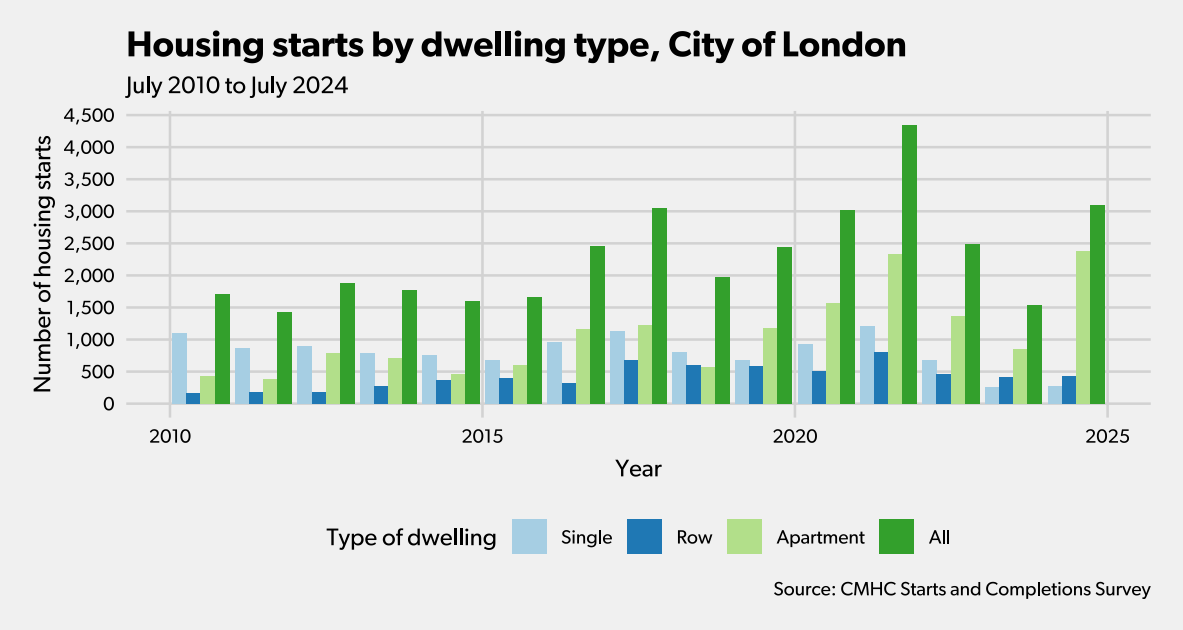


Figure 10: Housing starts by dwelling type, City of London, July 2010 to July 2024

What kinds of new housing units have been built over this time of increasing costs for both ownership and rental housing? CMHC's Starts and Completions Survey provides time series data on housing starts, which captures most, but not all, new housing unit creation.[23] There is a substantial increase in housing starts, from less than 1,430 in 2011 to a high of 4,347 in 2021. While new apartment starts have stayed elevated, with an average of 1,402 annually over the past nine years, starts of other kinds of housing units, which may be more immediately responsive to changes in the cost of financing, have declined in recent years. Only 269 single detached homes were started in 2024, down from 1,097 in 2010 and a peak of 1,214 in 2021. Similarly, only 427 row houses were started in 2024, up from 163 in 2010 but down from peak of 796 in 2021.

Through its Growth Management Implemetation Strategy (GMIS), the City of London aims to manage housing growth so that it proceeds in an orderly and cost-effective way.[24] Figure 11 shows how housing starts are distributed throughout the city, at the census tract

[23] Generally, for a "housing start" to be counted, there must be a foundation started. Renovations of existing homes to add units entirely within an existing building envelope, for example, would not be captured. Housing starts are also a gross measure of changes in the housing stock, only counting additions and not losses, through, for example, demolition.

[24] For an overview of the GMIS, see https://london.ca/business-development/growth-management-implementation-strategy

level, for each year. Housing starts have been primarily focused in census tracts in the core, North, West and Southwest.

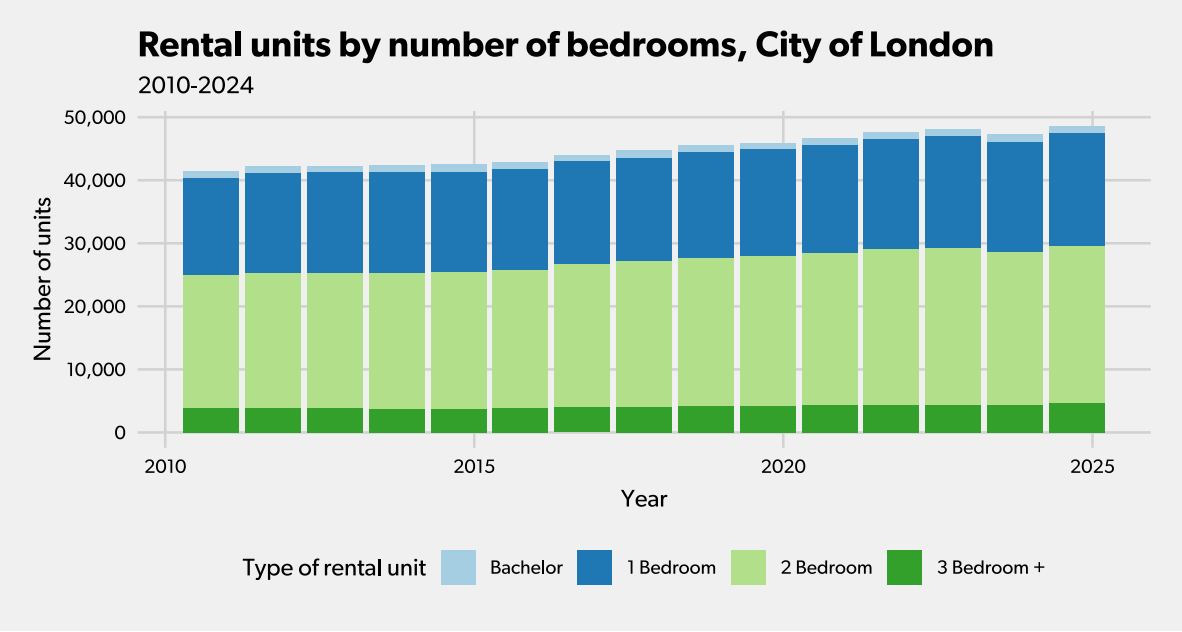


Figure 12: Rental units by number of bedrooms, City of London, Oct 2010 to Oct 2024

We can explore changes in the rental housing stock via the CMHC Rental Market Survey, the universe of which includes most but not all rental units.[25] Table 1 presents the counts and year-over-year changes for the rental universe by number of bedrooms. Generally, there is an increase in the overall rental stock every year, with the exception of 2023. Over the time period, the total rental stock has increased from 41,428 in 2010 to 48,558 in 2024, with most of the growth concentrated in two bedroom (+3,895) units and one bedroom (+2,403) units.

Housing starts do not capture rental units that move into or out of the rental universe without requiring the construction of a new building on a new foundation. Rental units can leave the rental universe captured by CMHC's Rental Market Survey by being converted to other residential uses (for example, short-term rental) or to owner-occupied housing. They can also be removed from the building stock altogether through demolition. Examining the change in the rental universe by age of construction (of the structure) shows when units enter or leave the rental universe. As shown in Figure 13, in some years there have been

[25] The Rental Market Survey universe includes structures with three or more units. It does not include all long-term rental units, social or affordable housing units or short-term rentals. See CMHC (2024) for more on the survey's methodology and Conference Board of Canada (2024) on short-term rentals. CMHC also conducts a Secondary Rental Market Survey that surveys condo apartments.

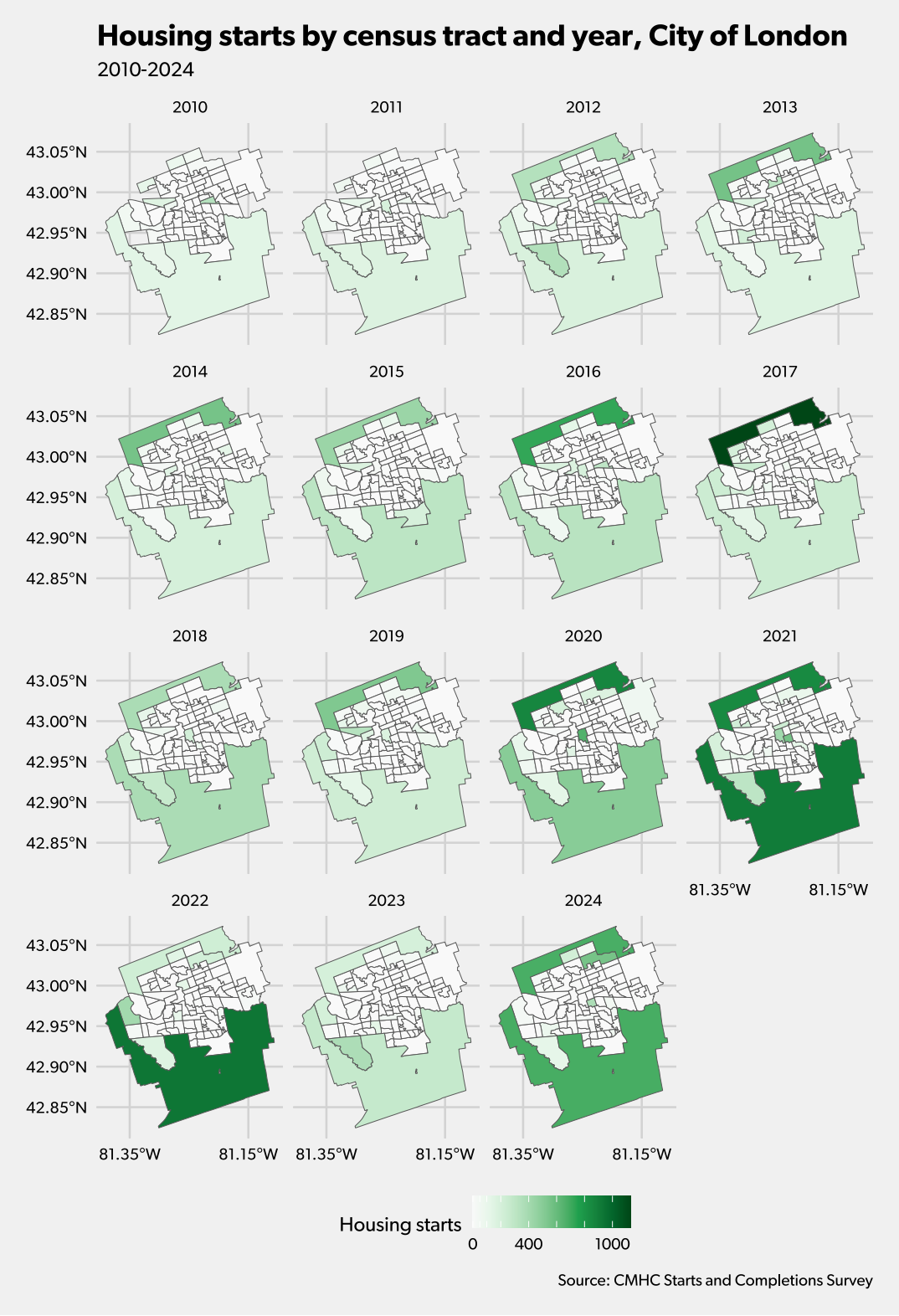


Figure 11: Housing starts in London by census tract and year

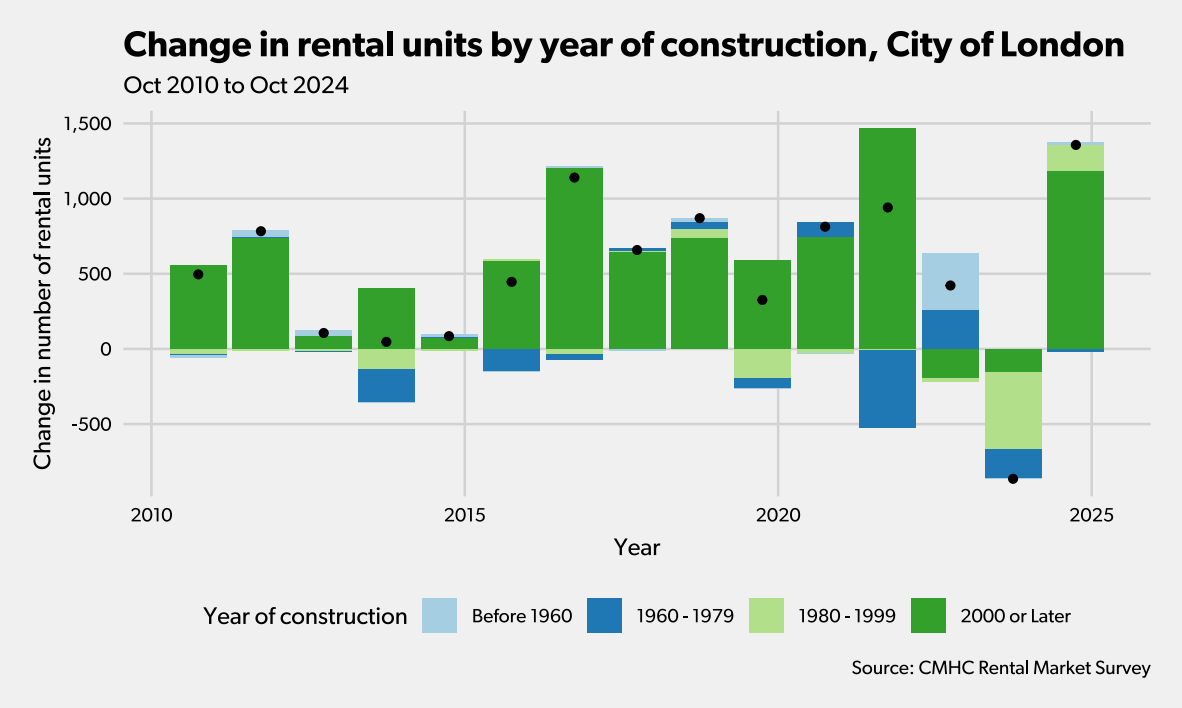


Figure 13: Change in rental stock by year of construction, City of London, Oct 2010 to Oct 2024

fairly substantial additions or removals to the rental universe for buildings constructed decades earlier, partially offsetting the gains from newly-constructed rental units. The black points show the net additions (removals) from the rental universe.

# Planning committee decision-making on land use

The private sector proposes, finances and builds new housing, but the municipality plays key roles in building infrastructure to support new housing (principally roads, sewers for water and wastewater, stormwater management) and in deciding on local land use policy through the municipality's official plan, which establishes high level land use designations or place types and zoning, which regulates what kinds of buildings can be built and operated for what purposes. Figure 14 shows the land use designations from the City of London's online zoning map.

To assess the kinds of decisions city council has made on land use policy, and the nature of local support or opposition to proposed residential developments, a novel dataset was constructed by scraping the public minutes of 275 planning committee meetings over almost 15 years and four distinct council terms (2010-2025).[26] Since many decisions are made by planning committee, including routine decisions like receiving reports, open and closing public participation meetings and so on, the set of decisions, in the form of motions decided on at committee, these motions have been categorized by decision type (amending the official plan or the zoning by-law or approving a site plan application); procedural motions — for example, open or closing public participation meetings — have been flagged. Depending on how the decision-making proceeds at committee, a particular item may have more than one motion associated with it at a particular meeting.[27] In total, there are 3,713 items and 6,181 motions in the dataset, 2,122 (34%) of which are opening or closing public participation meetings. Table Table 1 presents counts of motions by council term, whether they passed or failed, whether they were intended to introduce an amendment to the official plan or zoning by-law and if they were made notwithstanding advice from planning staff. Generally, across council terms, despite opposition that mobilizes to stop land use permissions from changing, most motions to introduce amendments,

[26] Disclaimer: the author was a member of the planning committee for six of the years in the time period, spanning 2014-2021. See the Appendix for more on how the data were collected and reshaped into tabular form.

[27] For a scheduled item with a public partcipation meeting, it is normal to have at least three motions (a substantive motion and two procedural motions).

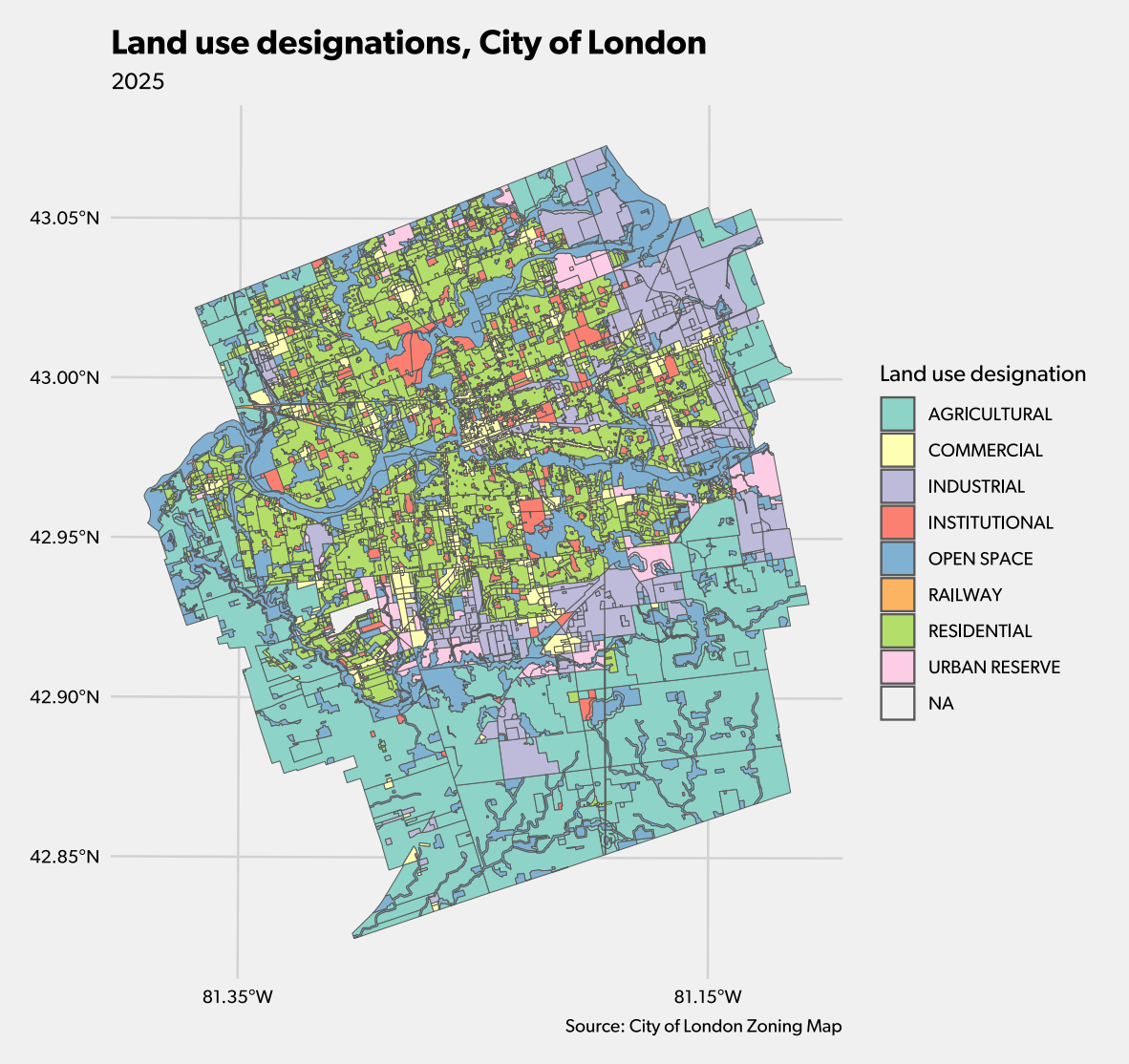


Figure 14: Land use designations, City of London, 2025.

| Item Feature | Result of Motion | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | 2010-2014 | | 2014-2018 | | 2018-2022 | | 2022-2026 | |
| | Failed | Passed | Failed | Passed | Failed | Passed | Failed | Passed |
| **Type of issue** | | | | | | | | |
| Zoning By-law | 11 | 413 | 16 | 436 | 14 | 383 | 6 | 230 |
| Official Plan | 8 | 411 | 16 | 436 | 16 | 405 | 7 | 243 |
| Site Plan | 2 | 140 | 5 | 116 | 7 | 87 | 4 | 126 |
| **Disposition** | | | | | | | | |
| Introduced Amendment | 1 | 340 | 16 | 454 | 13 | 470 | 7 | 251 |
| Referred | 4 | 99 | 6 | 83 | 6 | 55 | 2 | 14 |
| Refused | 2 | 36 | 4 | 50 | 5 | 31 | 2 | 17 |
| Notwithstanding Staff Advice | 0 | 38 | 0 | 0 | 1 | 2 | 2 | 20 |
| **Voting** | | | | | | | | |
| Divided | 11 | 25 | 25 | 126 | 26 | 56 | 12 | 48 |
| Unanimous | 0 | 1,025 | 0 | 1,107 | 0 | 1,057 | 0 | 541 |

Source: author's calculations from City of London planning committe minutes. Excludes motions to open or close PPMs.

Table 1: Counts of motions at planning commmittee by council term, Dec 2011-Mar 2025.

either to the Official Plan or Zoning By-law are successful at planning committee and very few are passed notwithstanding planning staff advice.

When zoning decisions are made, they eventually result in an update to the City of London's online zoning map, which tracks when zones were last updated. Although this does not map directly to council decisions, as there could be other reasons for updating a zone, it is a good proxy measure of when zones were changed. Figure 15 shows the zones that were last updated by the council term when the last update occurred.[28]

[28]The dataset starts tracking changes on Sept 6, 2011, so any areas updated on or before that date are shown as "Before Sept 2011."

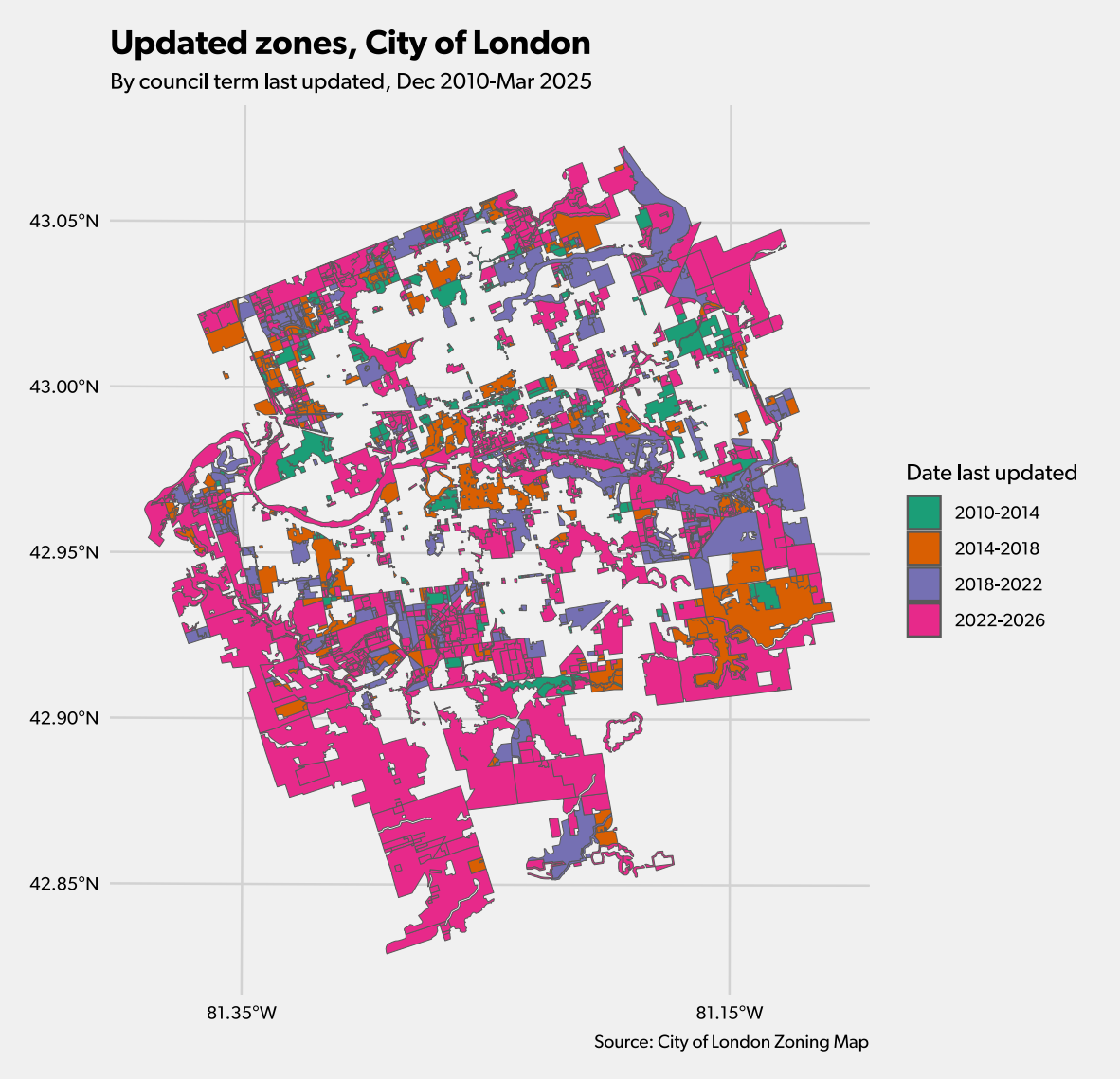


Figure 15: Zoning updates by council term last updated, 2010-2025.

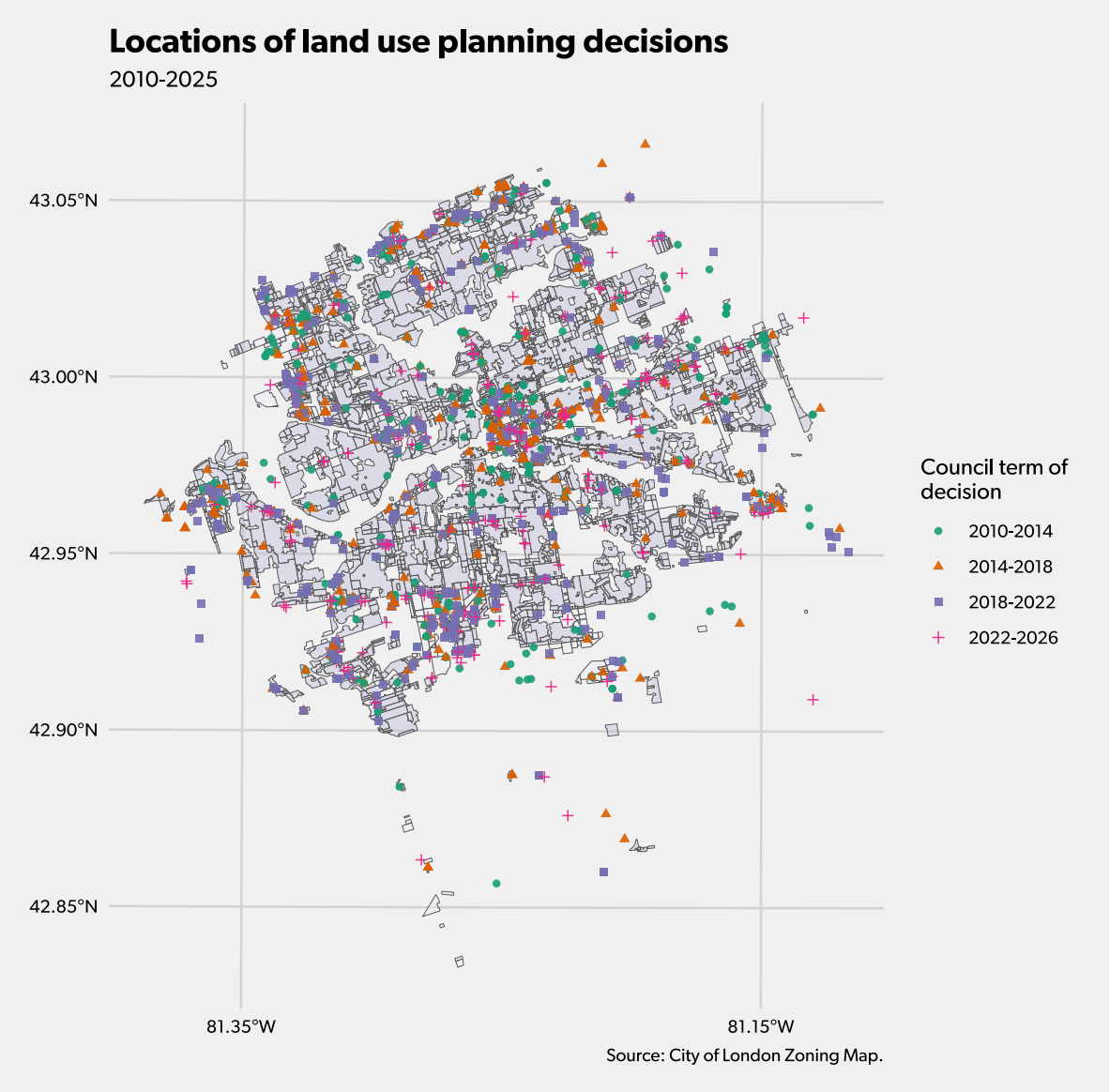


Figure 16: Location of land use decisions by council term, 2010-2025.

# Measuring sentiment related to land use changes

In Ontario, provincial legislation requires municipalities to hold public participation meetings (PPMs) for certain kinds of land use decisions, including changes to zoning bylaws and official plans. In London, these PPMs are held at the planning committee, which is a standing committee of the full council. Five members of council, plus the Mayor, are members of the committee. As a standing committee, the committee members make recommendations to the full council.

At a PPM, the typical order of business is for municipal planning staff to present an overview of the issue and the reasoning for the staff recommendation (usually to approve or refuse an application). After the staff presentation, there is an opportunity for committee members to ask technical or clarifying questions. Next, the applicant (the person or organization who applied for a change) or the applicant's agent (often a private sector planning professional) is invited to speak for up to five minutes. During a PPM, there are fairly strong norms of decorum, enforced by the chair of the meeting, intended to foster respectful dialogue and exchange of opinions.[29] After the applicant, members of the public are invited to speak to the committee about the proposed land use change or issue, also for up to five minutes. For contentious matters, the staff presentation, applicant's comments and public comments can easily take 30 mins or more. Once no more members of the public want to speak, the PPM is closed and the members of the committee discuss the issue, make motions and vote on those motions.

Archon Fung developed the concept of the democracy cube to explain the various ways that public participation can be structured (2006). Fung's cube has three dimensions: who participates (participant selection), how they communicate and make decisions (modes of communication and decision), and how participation is linked to action (extent of power and authority) (2006: 68-70). In terms of participants, public participation meetings are open to anyone, but property owners who live close to the subject property are notified directly about the proposed change and advised of the upcoming meeting. The applicant, or at least their professional planning consultant, almost always speak at the meeting. Residents who live outside of the 120 meter notification distance may see a sign posted on

[29] Speakers who violate these norms may be asked by the Chair to leave the public participation meeting.

the property or hear about the meeting through other means. So, participant selection is open but targeted towards some participants more than others, involving, to use Fung's categories of actors, the *state* (planning staff, elected officials), *minipublics* (professional stakeholders, lay stakeholders), and targeted or self-selected members of the public. In terms of modes of decision, most participants are either listening or expressing their preferences. In terms of decision-making, applicants decide what to ask for (and whether to appeal), committee members decide what to recommend to the full council, and municipal planning staff decide what to recommend to members of the planning committee, providing technical expertise and advice. The extent of power and authority, for the public, is communicative influence; for the committee, it is limited to the committee's recommendation to the full council, which is not bound by the committee's recommendation. This report focuses on speaking at planning committee meetings as one of the more labour-intensive forms of public participation, requiring more work on the part of the residents, for example, than sending an email or signing a petition.

Although the duration of meetings does not reveal much about the specific sentiments of the speakers, it is a decent proxy measure of how contentious planning committee meetings are. Figure 17 shows the average duration of PPMs by council term, from 2011 to 2025. The average duration of planning committee meetings has declined in each successive term of council, reaching a low point of 191 minutes in the partial 2022-2026 council term.[30]

The number of speakers who make time to attend a PPM, either in person or virtually, is a more specific measure of the intensity of sentiment on a particular issue. Figure 18 shows the number of speakers per item. Unlike the duration of meetings, there is no substantial change over time, reflective of the fact that for many items, there are no speakers at all. However, spikes in the number of speakers are observed throughout the time period. It is not uncommon to have 10 or more speakers on an item, each with up to five minutes, including the applicant. The peak in October 2012 relates to a proposed change to the zoning for 425 Wharncliffe Road South to allow a methadone clinic to operate on the property. Forty-six people spoke at the meeting, including the applicant and their agent. The peak in April 2018 relates to the Medway Heritage Forest Environmentally Significant Area Conservation Master Plan, an issue to which 43 people spoke.

To measure not just interest or intensity of feeling it is necessary to go beyond simple counts of speakers and duration of meetings. To better understand whether these speakers were supportive or opposed to the issue being discussed, the text of the comments made by speakers was extracted from the minutes (paraphrases of comments recorded in HTML files) or the attached records of public comments (paraphrases of comments or verbatim

[30] Starting in 2024, planning committee meetings were moved from starting at 4pm to starting at 1pm. The days of 10+ hour meetings that extend into the following day seem to be in the past.

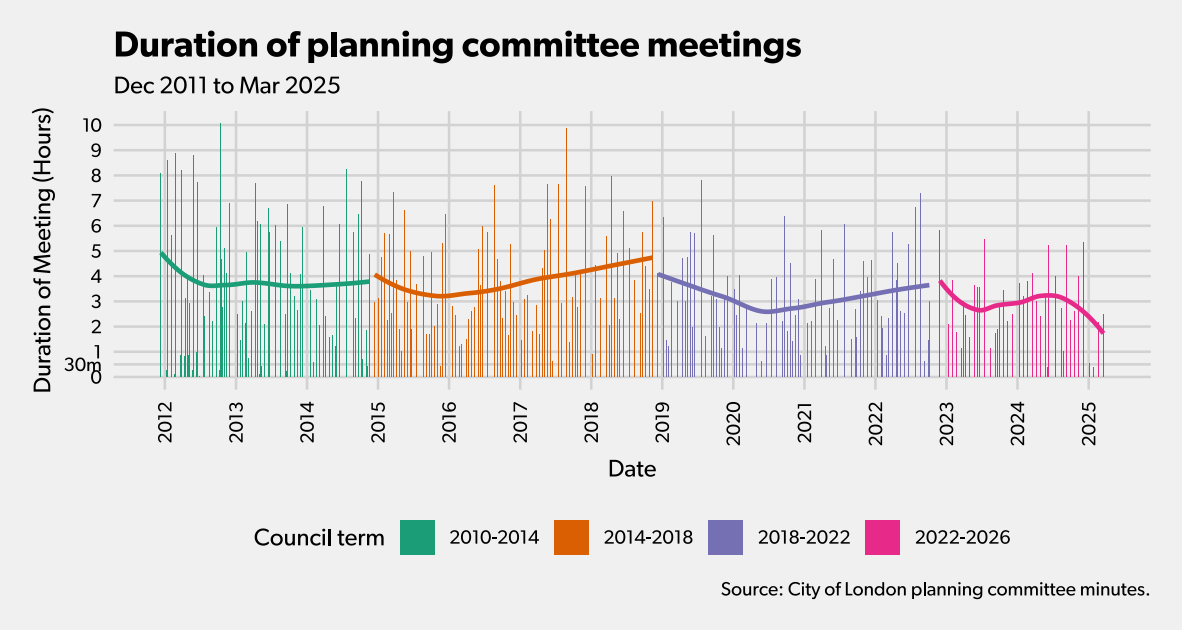


Figure 17: Duration of planning committee meetings by council term, 2011-2025.

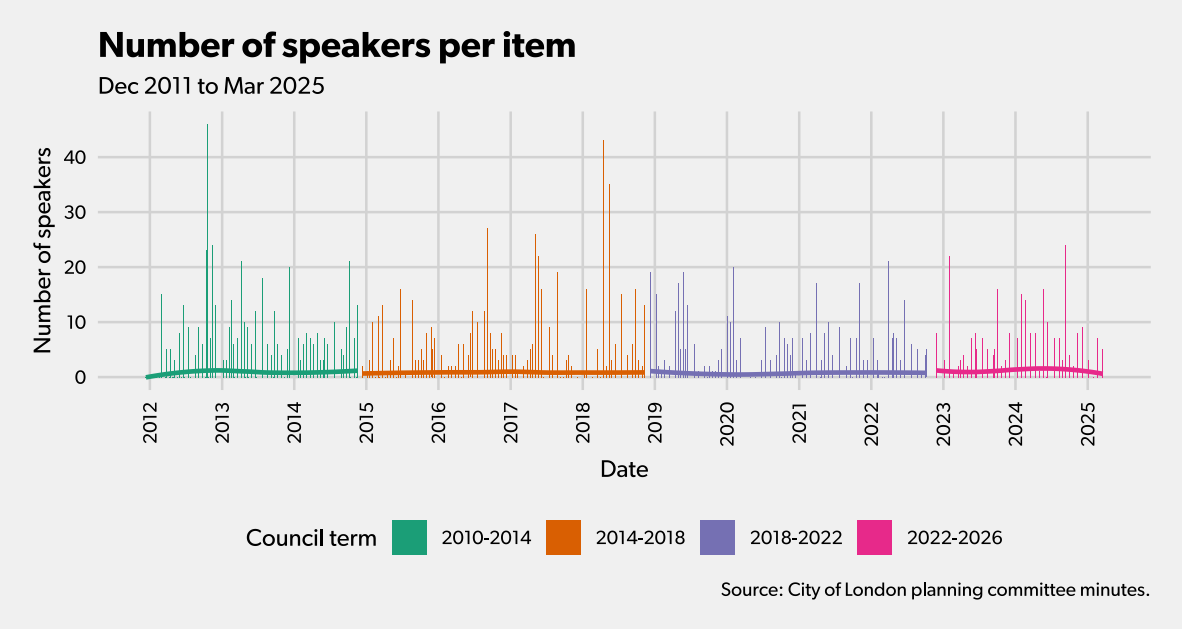


Figure 18: Number of speakers per item at planning committee meetings, by council term, 2011-2025.

comments recorded in PDF documents), covering most but not all of the time period.[31] In total, 3,297 speakers were recorded speaking to 910 different items. All together, these comments amounted to 772,084 words.

Analysis was undertaken using the *sentimentr* R package (2021) to measure the sentiment of the comments. The *sentimentr* package allows analysis of sentences, which are then aggregated to the comment and item level. A sentiment score of zero is neutral, with positive scores denoting positive average sentiment and negative scores denoting negative average sentiment. One advantage of using the *sentimentr* package for analysis is that it allows for the inclusion of negation — for example, "I don't like this development" would be scored as negative while "I like this development" would be scored as positive. There is a noticeable drop-off in the average sentiment of comments starting in 2020, which corresponds to a change in the way comments are recorded in the minutes.[32] Two qualifiers are important in interpreting the sentiment scores: first, the paraphrasing of comments for inclusion in the minutes, in addition to strong norms of decorum within the public participation meeting format, may result in a more positive tone than the verbatim comments delivered at the meeting. So a slightly positive sentiment score may be a comment that is opposed to the issue. Second, speakers may speak positively about some things (e.g. their own neighbourhood) and negatively about other things (e.g. the proposed land use change) in the same comments, so it is to be expected that many comments will have mid-range rather than extreme sentiment scores.

Figure 19 shows the average sentiment of comments by speaker to an item. This score is an aggregation of sentences included in the speaker comments. The average sentiment for most speakers is positive. For applications with just a single speaker, of which there are 360 (approximately 9.4% of all items), this is to be expected, as the speaker is typically, but not always, the applicant or a representative of the applicant, speaking in support of a staff recommendation. However, there are 431 speakers with negative average sentiment; unsurprisingly, these overall negative sentiment comments tend to be clustered around particular items. Figure 20 shows the average sentiment of comments by speaker, coloured by the number of speakers rather than the council term.

Using the National Research Council lexicon and the *sentimentr* package, we can link words to emotions, including negated emotions (Mohammad and Turney 2010; Rinker 2021).[33] Figure 21 shows the average emotion rate, or the share of recorded words spoken that are

[31] Unfortunately, similar data are not available for more recent meetings, which list the names of speakers but not their addresses or the nature of their comments. To analyze these data, audio from the meetings would need to be transcribed.

[32] Starting in January 2020, public participation meeting comments are recorded as a transcript in attached PDF documents rather than paraphrased.

[33] The lexicon includes 14,182 words and true/false values for each of the eight emotions: anger, anticipation, disgust, fear, joy, sadness, surprise and trust.

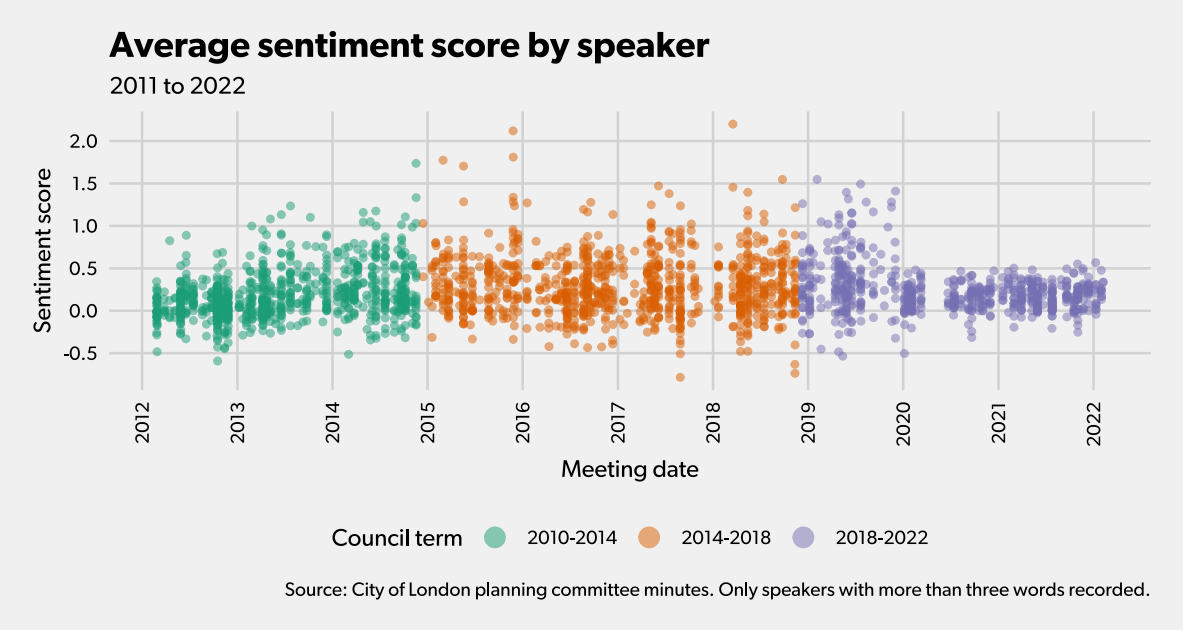


Figure 19: Sentiment of comments on land use decisions by council term, 2011-2022. Text comments are not recorded in the minutes for most of 2022 to 2025.

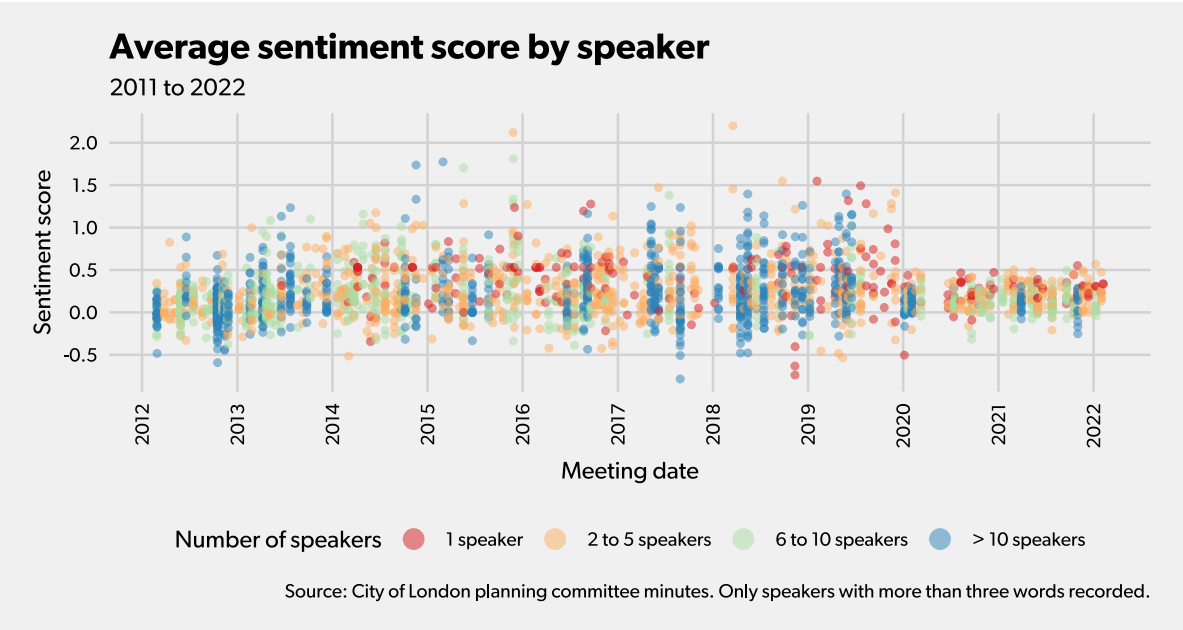


Figure 20: Sentiment of comments on land use decisions by council term, 2011-2022. Text comments are not recorded in the minutes for most of 2022 to 2025.

emotion words, by each of the eight emotion types.[34] Two positive emotions, anticipation and trust, are the most frequently expressed emotions, but fear, disgust, sadness and anger are expressed consistently over time. The average emotion rate is per speaker, so it is a measure of the frequency of each emotion within the overall comments made by a speaker. There is variation over time in the emotion rate as speakers and issues change, but there is consistency over the whole time period, in the sense that the average emotion rate for each emotion type is similar across council terms (until comments are no longer included in the minutes).

The high level sentiment and emotion analysis over the time period shows that negative sentiment and negative emotions are expressed frequently, but not universally, in comments on land use decisions at planning committee, and that particular issues that garner a relatively high degree of public interest differ from the more common items that have a single speaker. To understand these outliers better, the next section explores several case studies of land use decisions made at planning committee, primarily focusing on residential infill development. The first two case studies are city-wide issues, but the remaining six case studies are site-specific proposals for low-rise, mid-rise or high-rise residential infill, some of which faced significant opposition and some of which did not.

[34] The same word may be associated with more than one emotion.

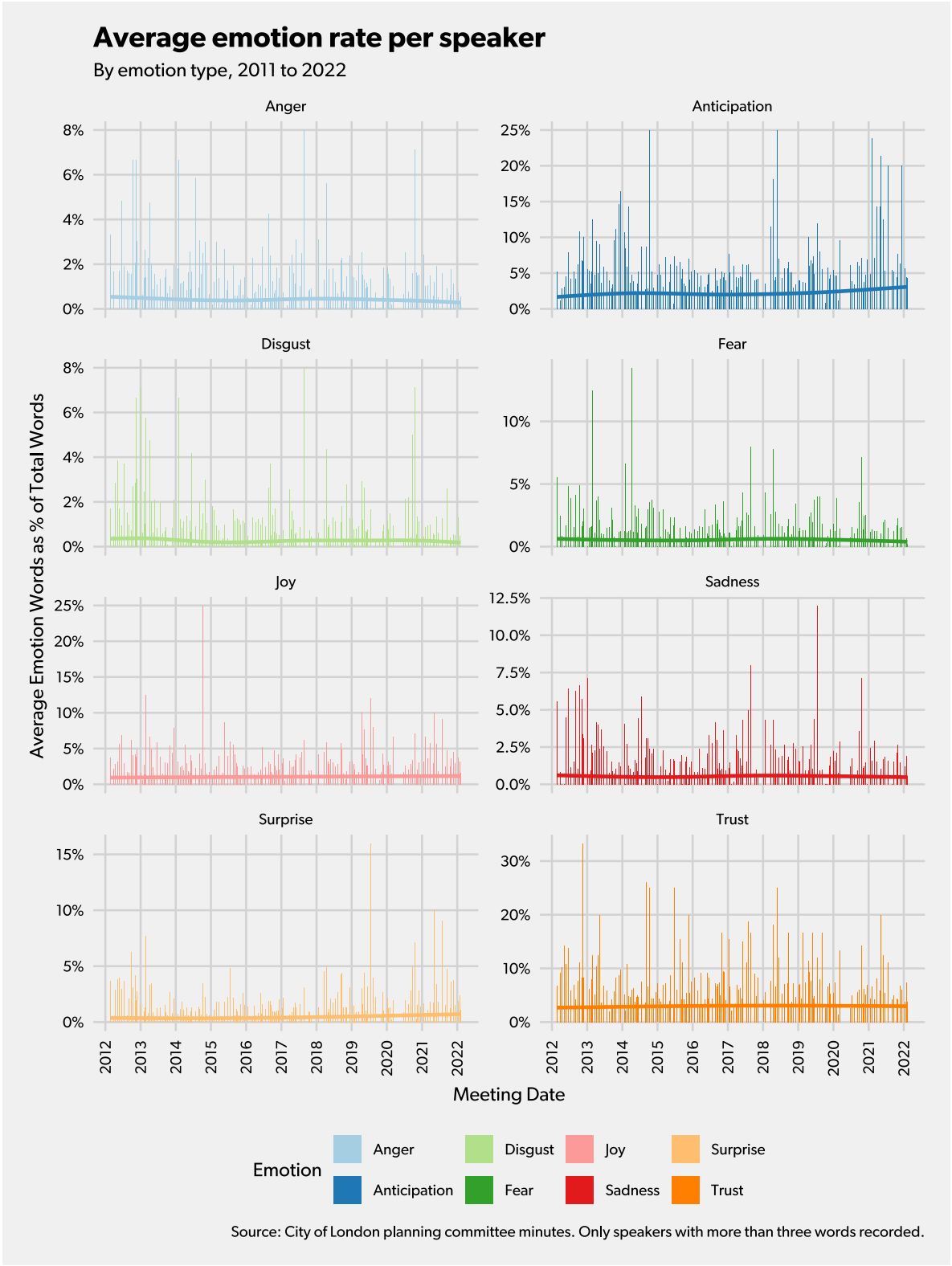


Figure 21: Average emotion rate (share of words that are emotion words) by emotion type, 2011-2022. Negated emotions not shown. Text comments are not recorded in the minutes for most of 2022 to 2025.

# Case study: city-wide issues

Many proposals to change zoning regulations are focused on a specific property. However, in other cases, the proposed changes would apply in a broader area. In this case study, we explore two city-wide issues: the expansion of additional residential units (ARUs) to allow up to four residential units per residential parcel and changes related to planning for supervised consumption sites (SCSs).

## Additional residential units

As part of its agreement with the federal government related to the Housing Accelerator Fund, the City of London committed to allowing up to four residential units on a residential parcel. Provincial changes had already allowed up to three units: a primary residential unit and up to two additional residential units. To increase the maximum to four, the city proceeded to update its zoning by-law. The agreement with the federal government was made in 2023 and the proposed amendments to the bylaw were considered shortly thereafter in October 2023.

As described in the staff report on the proposed, the London Plan supports residential intensification via additional residential units:

> Policies 937 and 938 underscore residential intensification as fundamentally important to key directions within the London Plan and provide rationale for intensification throughout neighbourhoods. Policy 939 identifies additional residential units as an important planning opportunity for "purposeful, sensitive and compatible intensification" and defines additional residential units as a "very light and discreet form of intensification". (City of London 2023b)

The staff reports also noted that minimal feedback had been received on the proposed changes, which were being considered as quickly as allowed under the *Planning Act* (City of London 2023b: p. 3-4). Despite the fact that the proposed change would alter the maximum number of residential units on thousands of residential parcels within the city, only five people spoke at the public participation meeting. Although the comments made are not recorded in the minutes, the video of the meeting shows that the majority of speakers

were in favour of the proposed changes, including Mike Wallace, the executive director of the London Development Institute (LDI); John Fleming, the retired City Planner for the city, then working as a planning consultant; and Emily Poirier, vice-president, external affairs of the University Students' Council at Western University. There was some discussion about future potential changes, which were considered by planning committee several months later in January 2024.

At the January 2024 meeting, the focus was on the city-wide limits on the number of bedrooms per unit, which were five bedrooms (city-wide) and three bedrooms (in the Near Campus Neighbourhood (NCN)).[35] At this meeting, there was much more public participation, with 15 people speaking at the public participation meeting.

## Planning for supervised consumption sites

A second city-wide issue is planning for supervised consumption sites (SCSs).[36] Supervised consumption sites are facilities where people can use illicit drugs under the supervision of trained staff, who can provide emergency medical assistance in the event of an overdose. SCSs, which are enabled through an exemption to the federal *Controlled Drugs and Substances Act* are part of a broader harm reduction strategy to reduce the harms associated with substance use, including overdose deaths. In London, the Middlesex-London Health Unit (MLHU) had been working to establish SCSs since 2017 (City of London 2018: p. 15-16).

Although the proposed policies considered at this meeting applied city-wide, several specific sites were relevant at the time of the planning committee meeting. As described in the staff report, a temporary overdose prevention site (TOPS) was operating at 186 King St, an application for a SCS had been submitted by MLHU and Regional HIV/AIDS Connection (RHAC) for a site at 372 York St (later withdrawn) and 446 York St and 241 Simcoe St had been identified as potential sites for a Supervised Consumption Facility (SCF); a mobile unit to serve other areas of the city was also being planned (City of London 2018: p. 15-16). So the city-wide issue had a strong local focus, as demonstrated by the locations provided by speakers at the meeting. Figure 22 shows the area around 186 King St, which was the location of the temporary overdose prevention site at the time of the planning committee

[35] The Near Campus Neighbourhood (NCN) is an area defined in the Zoning By-law. Over time, areas within neighbourhoods have experienced significant residential intensification through conversion of single-detached housing into student rental housing.

[36] Disclaimer: the author was a volunteer member of the advisory group for the feasibility study for supervised injection services in London (see (Kerr et al. 2017)), served as a council-appointed member of the Middlesex-London Board of Health from 2014-2018 (as Chair in 2016 and 2017), was a member of the planning committee when this matter was considered, and voted in favour of the proposed changes.

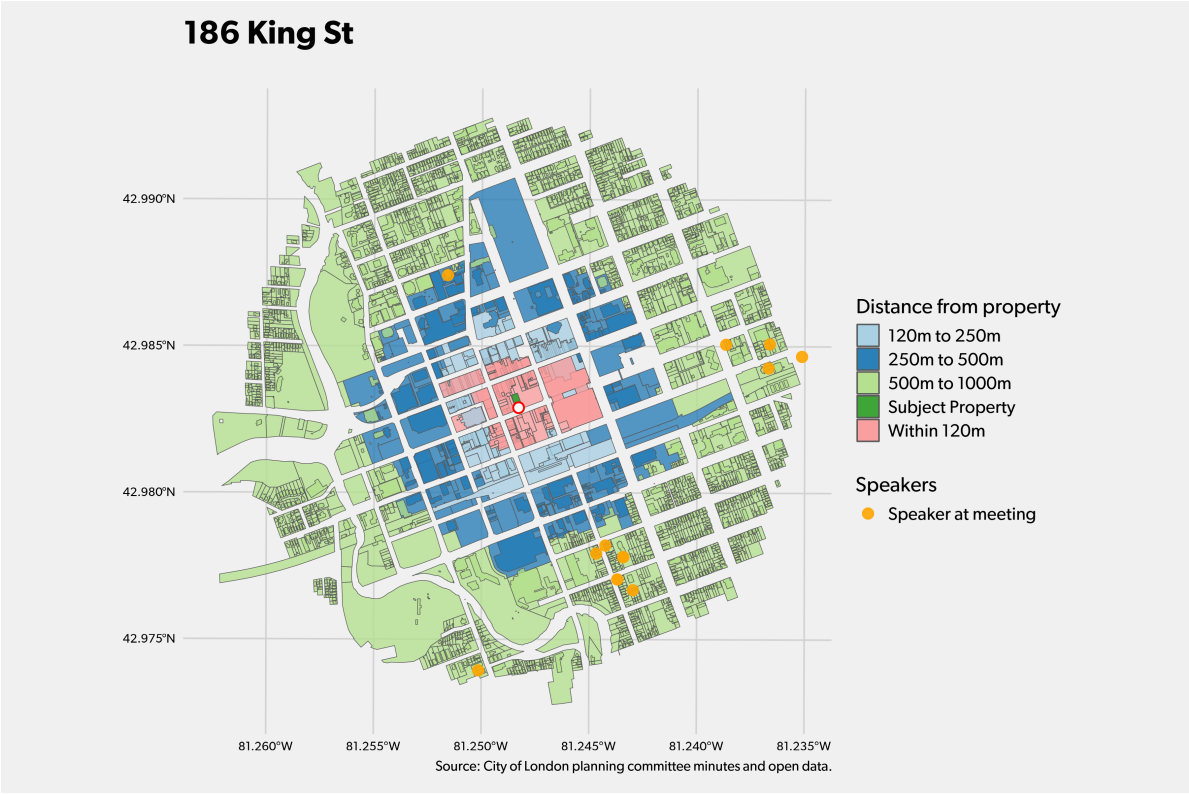


Figure 22: Map showing area around 186 King St.

meeting. Clusters of speakers are noticeable around 241 Simcoe St (Southeast of 186 King St) and 446 York St (East of 186 King St). Speakers located farther away are not shown on the map.

A community information meeting was held on 21 March 2018, which was attended by 23 people (City of London 2018: p. 6). Beyond establishing defnitions for the uses, the proposed policies articulated how potential future zoning by-law changes would be evaluated by setting out evaluation criteria. Feedback was collected from comment cards at the meeting and summarized in the staff report. Changes to the proposed policies were made in response to some of the feedback, including removing the qualifier "public" on schools so as not to exclude private schools from the relevant policy regarding avoiding land use conflicts through separation of SCS and TOPS from schools and requiring conceptual site plans for SCSs and TOPS, so that the public can provide feedback on on the specifics of site design. Requests for specific separation distances, such as 300 metres from schools, were not incorporated, "as minimum distance would result in excluding SCF or TOPS from locations where the populations to be served would be located" (City of London 2018: p. 8).

At the public participation meeting, 35 people spoke to the issue, including some who were in favour of the proposed policies and others who were opposed. The speakers included residents who lived very close to locations that were being considered for potential SCSs, such as 241 Simcoe St and 446 York St, as well as those who lived farther away. As shown in Figure 23, although several speakers have a relatively high emotion rate for negative emotions like disgust, fear, anger and sadness, emotion rates for positive emotions are relatively high, reflecting the mix of opinions on the proposed policies and the norms of decorum related to the public participation meeting.

After the public participation meeting, the committee voted 5-0 in favour of the policies recommended in the staff report.[37] Council unanimously approved the committee recommendation, with 13 members in favour, Councillor Turner recused and one member absent. A permanent SCS at 446 York St opened on 28 February 2023 (Bhargava 2023).

[37] One member, Stephen Turner, was absent, having earlier declared a pecuniary interest in the matter related to his employment at the Middlesex-London Health Unit.

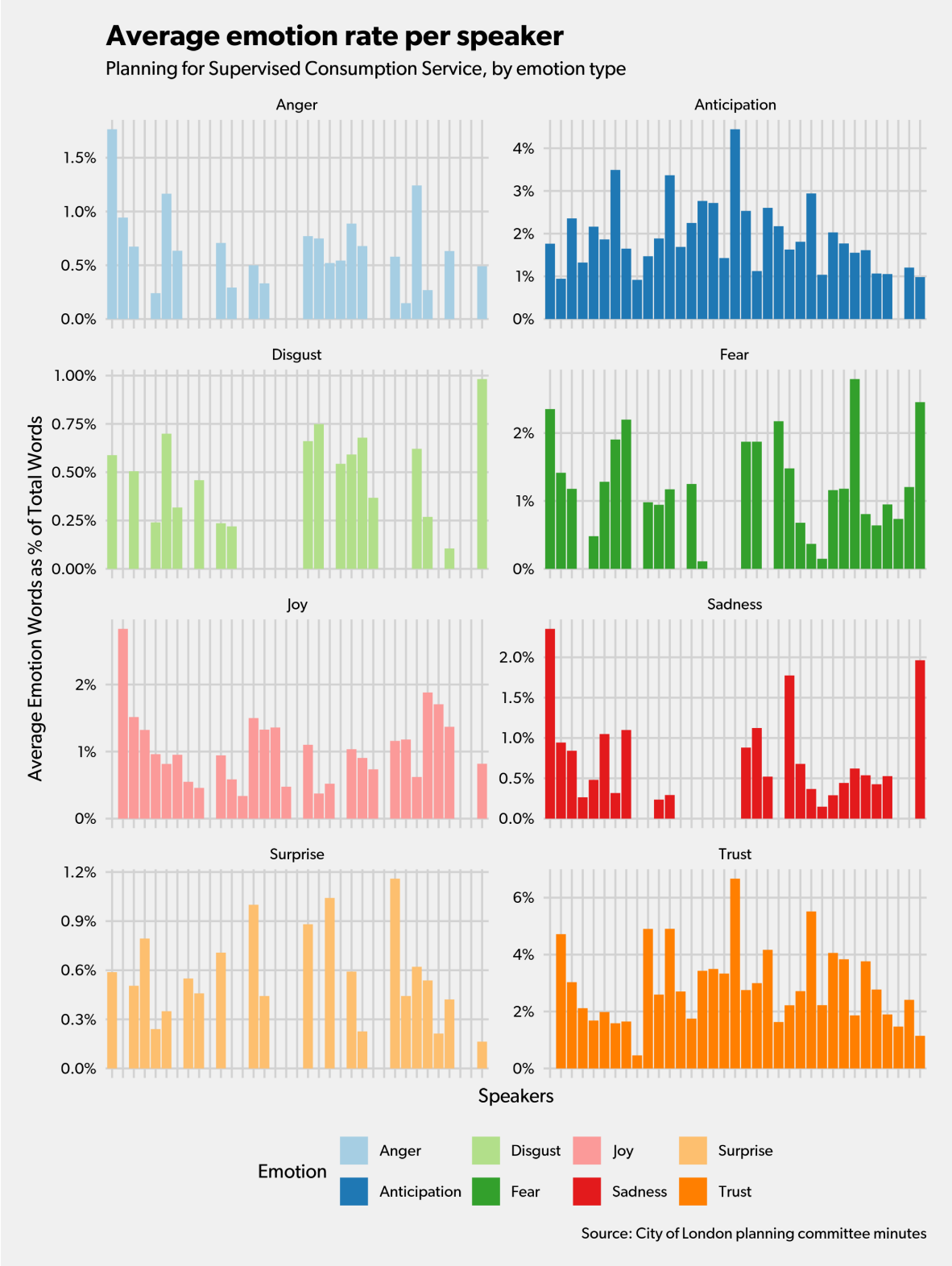


Figure 23: Emotion rate by emotion type and speaker at the public participation meeting related to Planning for Supervised Consumption Services.

# Case study: A mid-rise apartment in low density residential area

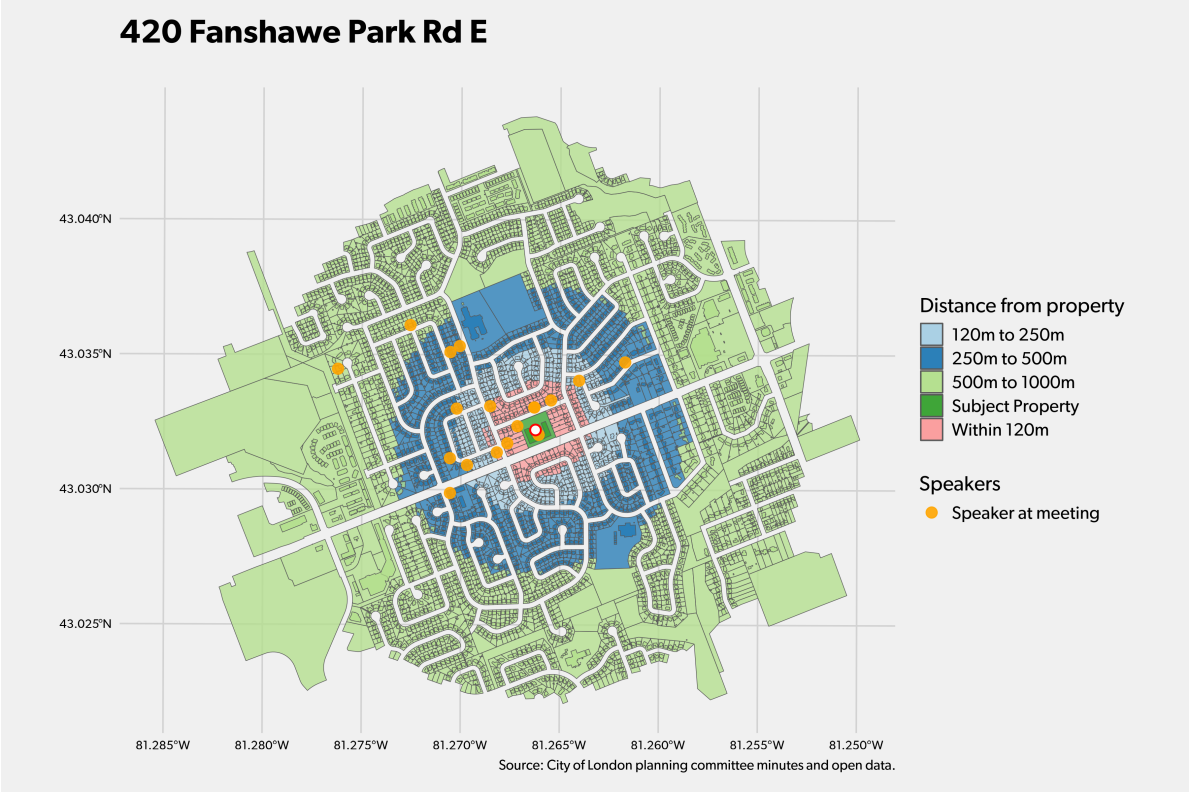


Figure 24: Map showing area around property.

- **Existing:** Former site of a single-detached home
- **Proposed development:** Mid-rise apartment building (142 homes)
- **Existing Zoning:** Residential R1-7 (low density residential)
- **Proposed Zoning:** Residential R1-7 with a bonus zone to allow up to 100 units / hectare

Formerly the site of a single-detached home on a large lot, the property fronts onto Fanshawe Park Road, a busy street classified as an *Urban Throughfare* in the London Plan. A

request to demolish the property was approved by city council in November 2014 (City of London 2017: p. 8; De Bono 2014). An application to change the official plan designation to medium density, multi-family and to rezone the property to allow for a 22.6 metre high mid-rise apartment with 142 homes was submitted in 2016. More than 450 people responded to the public notice of the application via calls, emails, faxes or by signing one of several petitions. A revised proposal, which reduced the requested height from 22.6 to 14.6 metres, also resulted in hundreds of responses from the public (City of London 2017: p. 11-13). Two public information meetings were held. The first, focused on the initial proposal, was held at a local church in June 2016. The second, focused on the revised proposal, was held in March 2017.

The staff report on the matter recommended the change to the official plan and a bonus zone to allow for up to 100 units per hectare (City of London 2017) and the requested height. The same report summarized the concerns raised by residents (City of London 2017: p. 11-14). A non-exhaustive list of concerns included:

- the height of the building, which was considered too high for the area;
- the proposed development was not compatible with the existing low density residential neighbourhood;
- loss of property values;
- increased traffic congestion and safety concerns;
- loss of privacy and sunlight; and
- loss of mature trees and green space.

The revised proposal was considered by the planning and environment committee on 23 May 2017. Given the significant public interest, the venue for the committee meeting was moved to Wolf Performance Hall, a theatre space at the Central Public Library branch. At the public partcipation meeting, 22 people spoke to the matter, including the applicant's professional planning consultant.[38] The vast majority of the speakers opposed the proposal, citing many of the same concerns as those raised in the public information meetings. As shown in Figure 24, many of the speakers (represented as orange dots on the map) lived within 500 metres of the boundaries of the subject property (dark green).[39]

Figure 25 shows the emotion rate of the speakers at the public participation meeting by emotion type, for whom comments were recorded in the minutes.[40] Although several speakers have a relatively high emotion rate for negative emotions like disgust, fear, anger

[38] Some of the speakers included presentations, which meant that their public comments were not recorded as the comments from other speakers were recorded.

[39] Any speakers who provided addresses located beyond the frame of the map are not shown on the map.

[40] The emotion rate is the number of words in a given emotion category divided by the total number of words spoken by that speaker. The emotion categories are based on the NRC Emotion Lexicon (Mohammad and Turney 2010).

and sadness, emotion rates for anticipation and trust are quite high. This may be a reflection of speakers moderating their comments to fit within the norms of the public participation meeting, which is a formal setting where speakers are expected to be respectful of each other.

After the public participation meeting, which ended after 11pm, the ward councillor, Maureen Cassidy, moved to refer the matter back to planning staff for further consultation with the community. This motion was seconded by Mayor Matt Brown, but the motion failed on a 2-4 vote. The committee recommended the changes to the official plan and zoning by-law, with the same four committee members voting in favour. At its next meeting, a motion to refer the matter back to staff was moved by Councillor Cassidy and seconded by Councillor Phil Squire. This motion failed on a 6-9 vote. The vote on the committee's recommendation to approve the official plan and zoning by-law changes then passed, 11-4.[41]

[41] Disclaimer: the author served on planning committee during this time and voted in favour of the proposal and against motions to refer at both the committee and council levels.

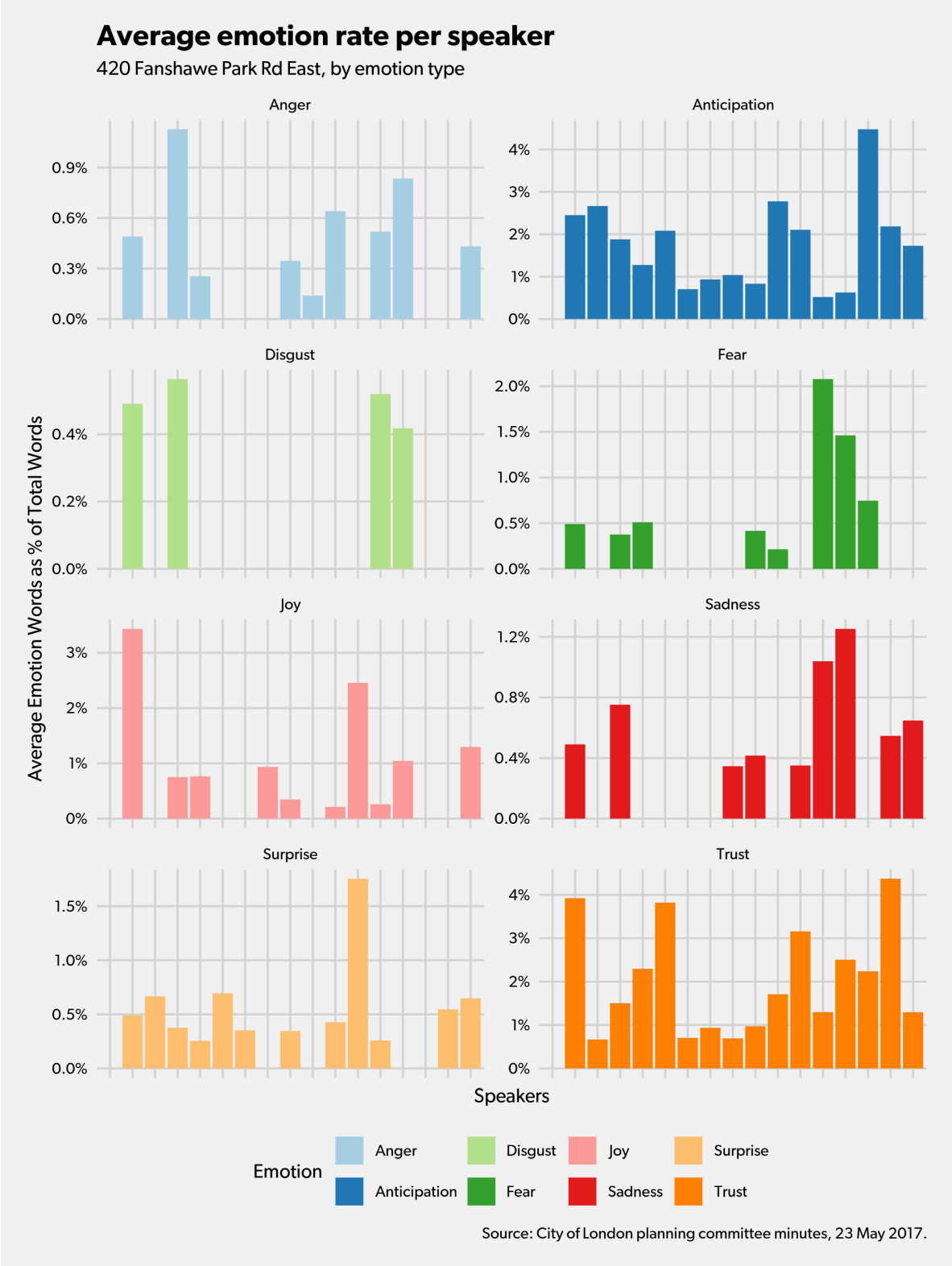


Figure 25: Emotion rate by emotion type and speaker at the public participation meeting for the 420 Fanshawe Park Road development application.

# Case study: A high-rise apartment downtown with heritage impacts

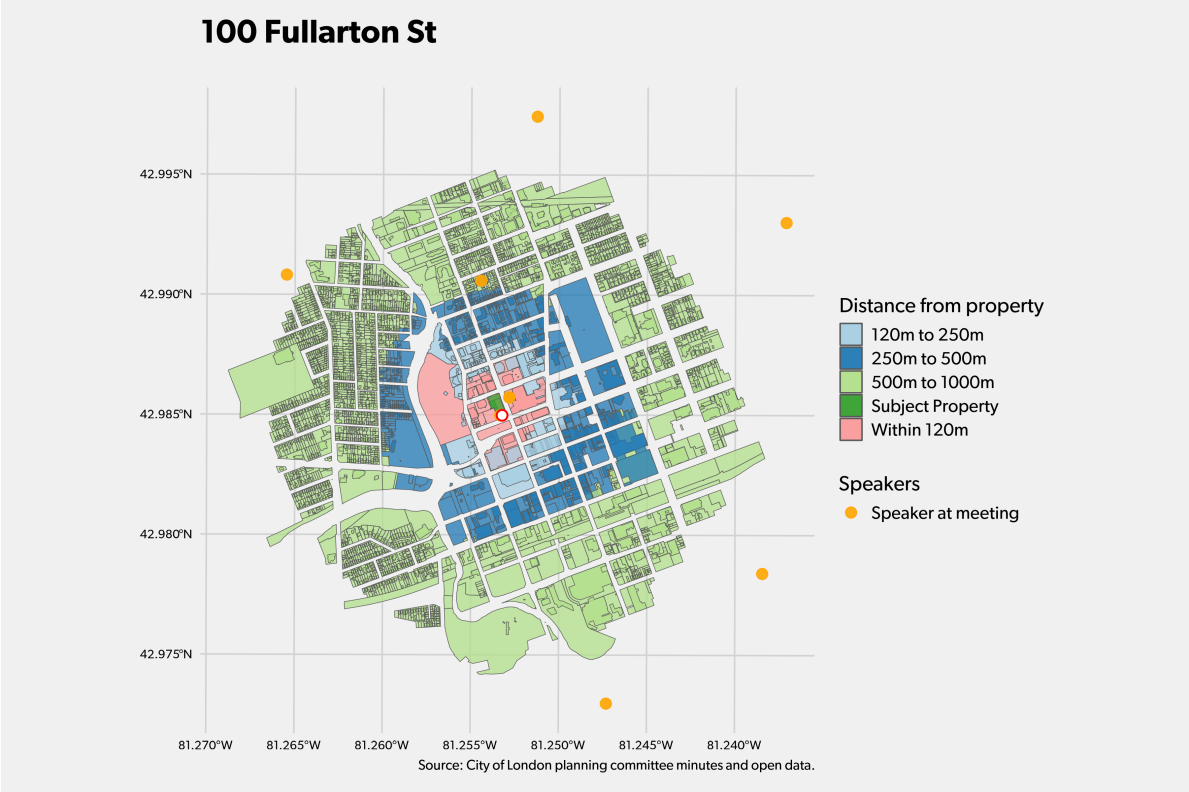


Figure 26: Map showing area around 100 Fullarton.

- **Existing:** Mix of heritage buildings, surface parking and office buildings
- **Proposed development:** High-rise apartment buildings (703 homes)
- **Existing Zoning:** Downtown Area, mix of heights and densities
- **Proposed Zoning:** Downtown Area, bonus zone up to 125m in height and 1,200 units / hectare

A collection of parcels containing different kinds of buildings, including a row of heritage-listed street townhouses (known as Camden Terrace), an office building, a surface parking

lot and a heritage-listed semi-detached building used as an office, covering approximately one-third of a city block (City of London 2016b). The site is located in the west end of the downtown area.

The applicant sought re-zoning for part of the property in Feburary 2014; after that re-zoning was approved, the applicant subsequently acquired adjacent lands and began discussions with planning staff about a large development of the entire parcel; in Sept 2015, a recommendation to issue an intent to designate the heritage listed properties was made to planning committee by the London Advisory Committee on Heritage, which was referred to planning staff (City of London 2016b: p. 9-12).[42] Planning committee considered a new request to re-zone the property in September 2016, which would increase the permitted height and density, demolish and commemorate Camden Terrace and retain some of the heritage-listed properties at 93-95 Dufferin Ave.

An open house was held in June 2016, which approximately 40 people attended, and ten responses were received after when notice of the re-zoning was issued. Concerns focused primarily on increased traffic and the potential loss of the heritage-listed buildings (City of London 2016b: p. 13-14).

The staff report on the matter recommended the re-zoning, including a bonus zone to allow for up to 1,200 units per hectare and the increased height, to 129 metres (City of London 2016b).

The revised proposal was considered by the planning and environment committee on 6 September 2016. At the public partcipation meeting, 27 people spoke to the matter, including several representatives of the applicant (lawyer, architect, heritage consultant and land use planner.[43] The vast majority of the speakers opposed the proposal, mostly focused on conserving the built heritage of the existing heritage buildings. As shown in Figure 26, many of the speakers (represented as orange dots on the map) lived more than a kilometre from the boundaries of the subject property (dark green).[44]

Figure 27 shows the emotion rate of the speakers at the public participation meeting by emotion type, for whom comments were recorded in the minutes.[45] Although several speakers have a relatively high emotion rate for negative emotions like disgust, fear, anger and sadness, emotion rates for anticipation and trust are quite high. This may be a reflection of speakers moderating their comments to fit within the norms of the public participation

[42] LACH is a council-appointed committee comprising volunteers who have particular interest and expertise related to heritage matters.

[43] Some of the speakers included presentations, which meant that their public comments were not recorded as the comments from other speakers were recorded.

[44] Any speakers who provided addresses located beyond the frame of the map are not shown on the map.

[45] The emotion rate is the number of words in a given emotion category divided by the total number of words spoken by that speaker. The emotion categories are based on the NRC Emotion Lexicon (Mohammad and Turney 2010).

meeting, which is a formal setting where speakers are expected to be respectful of each other.

On a 3-2 vote, planning committee recommended referring the matter back to planning staff. However, at its next meeting, city council defeated that recommendation to refer with only the two of the members of the planning committee in support (the overall vote was 3-11 with one absent). Council then approved the staff recommended zoning, 12-2.[46] The property was later acquired by Old Oak Properties and the first phase of development started leasing in late 2024 (Juha 2024).

[46] Disclaimer: the author served on planning committee during this time and voted in favour of the referral at the committee and the council level.

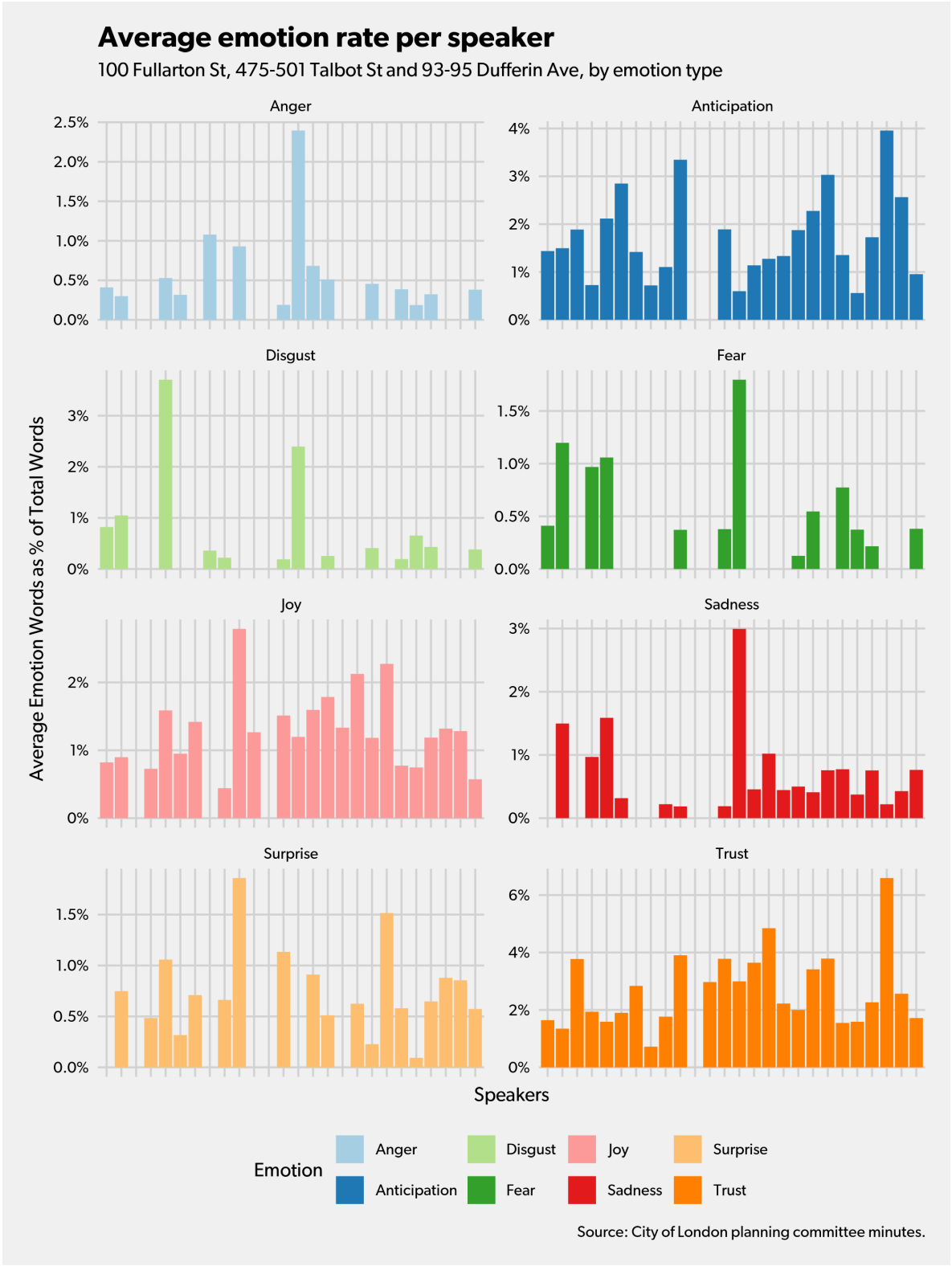


Figure 27: Emotion rate by emotion type and speaker at the public participation meeting for the 100 Fullarton St, 93-95 Dufferin Ave and 475-501 Talbot St development application.

# Case study: A high-rise apartment downtown on a surface parking lot

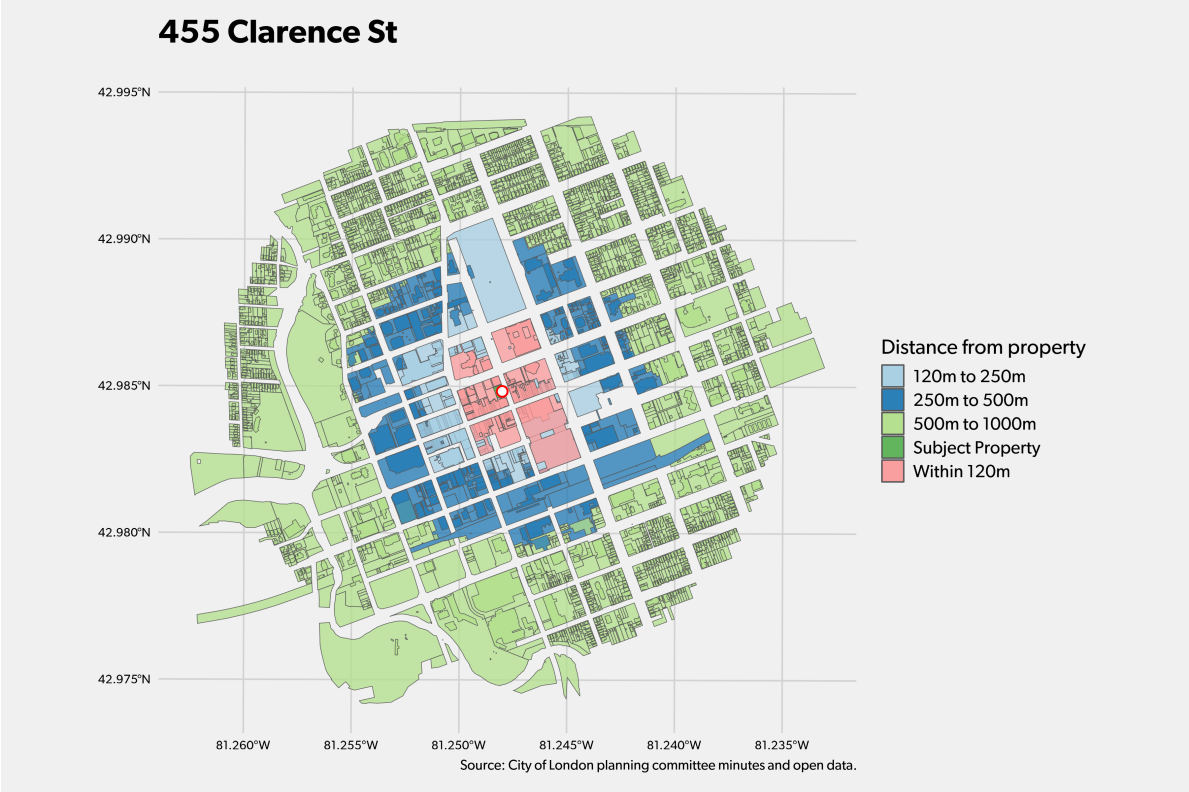


Figure 28: Map showing area around 455 Clarence St.

- **Existing:** A surface parking lot
- **Proposed development:** High-rise apartment building (182 homes)
- **Existing Zoning:** Downtown Area, up to 350 units / hectare
- **Proposed Zoning:** Downtown Area, bonus zone up to 105m in height and 1,180 units / hectare

Previously the site of a theatre, the property had been a surface parking lot since the theatre building was demolished in 1964 (City of London 2016a: p. 4). The staff report on the

application recommended a bonus zone to allow for up to 1,180 units per hectare (City of London 2016a) and the requested height. The same report noted that only three responses to the public notice had been received and that no concerns had been raised about the proposal.

The proposal was considered by the planning and environment committee on 20 June 2016. As shown in Figure 28, there were no speakers who lived near the subject property (dark green). In fact, there was only a single speaker at the public participation meeting for the 455 Clarence St development application. The speaker was a representative of the applicant, who spoke briefly in favour of the proposal. The staff report on the matter recommended the change to the official plan and zoning by-law to allow for a bonus zone to permit up to 105 metres in height and 1,180 units per hectare (City of London 2016a). The committee recommended the changes to the official plan and zoning by-law, with all five committee members voting in favour. City council approved the committee recommendation at its meeting on 23 June 2016, 12-0 with three members absent.[47]

[47] Disclaimer: the author served on the planning and environment committee during this term of council and voted in favour of the proposal.

# Case study: A high-rise apartment downtown on a parking structure

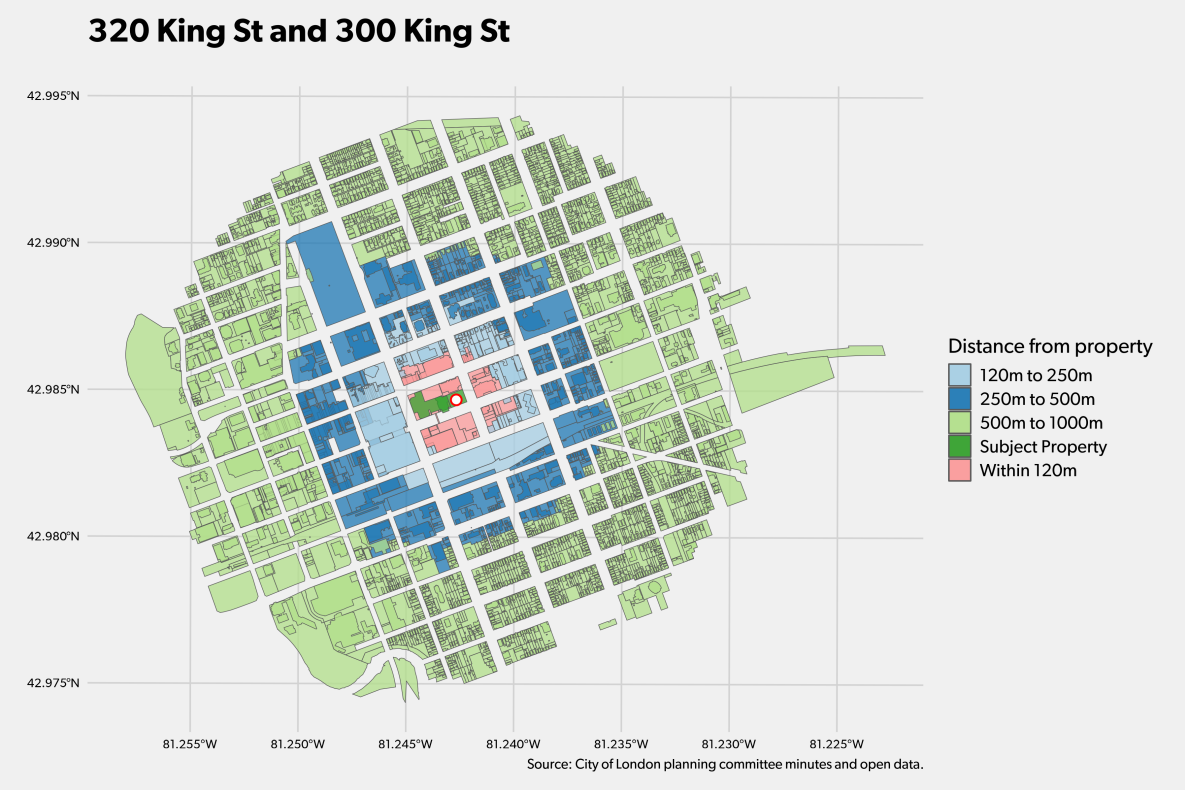


Figure 29: Map showing area around 300-320 King St.

- **Existing:** A two-storey parking structure beside a hotel
- **Proposed development:** High-rise apartment building (435 homes)
- **Existing Zoning:** Downtown Area, DA2 zone, up to 350 units / hectare
- **Proposed Zoning:** Downtown Area, bonus zone up to 112m in height and 940 units / hectare

Located along a future rapid transit corridor, the site is a two-storey parking structure associated with the adjacent hotel (City of London 2023a: p. 4). The staff report on the

application recommended a bonus zone to allow for up to 1,180 units per hectare (City of London 2023a) and the requested height. The same report noted that only three responses to the public notice had been received and that no concerns had been raised about the proposal.

The proposal was considered by the planning and environment committee on 20 June 2016. Figure 29 shows the surrounding buildings and parcels, but the locations of speakers are not included in the minutes. There was only one speaker at the public participation meeting for the 300-320 King St development application, which was held on 11 April 2023. The speaker was a representative of the applicant, who spoke briefly in favour of the proposal. The staff report on the matter recommended the change to zoning by-law to allow for a bonus zone to permit up to 105 metres in height and 940 units per hectare across the combined site, including the existing 22-storey hotel (City of London 2023a). The committee recommended the changes to the zoning by-law, with all five committee members present voting in favour. City council unanimously approved the committee recommendation at its meeting on 25 April 2023.

# Case study: A low-rise apartment adjacent to an environmentally significant area

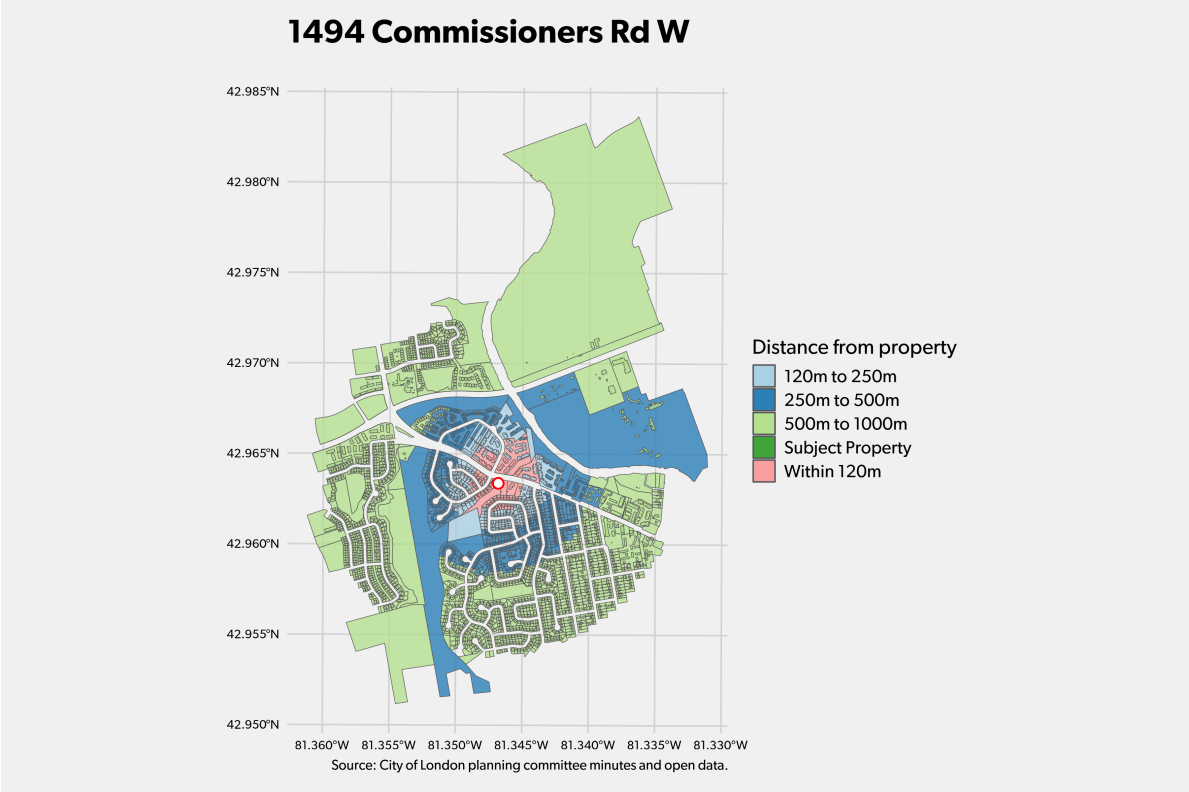


Figure 30: Map showing area around 1494 Commissioners Rd West.

- **Existing:** Single detached home on a large lot
- **Proposed development:** Four storey apartment building (10 homes)
- **Existing Zoning:** Residential R1-8 (low density residential)
- **Proposed Zoning:** Residential R8 and Open Space

The site is located on a major road, classified as a *Civic Boulevard* in the London Plan, and adjacent to the Warbler Woods Environmentally Significant Area (ESA) (City of London 2024: p. 1-3). The staff report on the application recommended the majority of the requested zoning change, including the height of four storeys, but refusal of one aspect (the west interior side yard setback). The same report noted that 43 responses to the public notice had been received. Concerns included:

- Tree removal and planting;
- Setback requirements;
- Fit for the neighbourhood;
- Lack of privacy; and
- Disruption to neighbourhood due to construction (City of London 2024: p. 8)

The proposal was considered by the planning and environment committee on 21 February 2024. Figure 30 shows the surrounding buildings and parcels, but the locations of speakers, and their comments, are not included in the minutes. There were 14 speakers at the public participation meeting, which was held on 21 February 2024. Despite the staff recommendation to approve the rezoning, the committee voted 3-1 to refuse the changes to the zoning by-law. City council narrowly approved the committee recommendation to refuse, with an 8-7 vote, at its meeting on 5 March 2024. The council decision was appealed by the applicant to the Ontario Land Tribunal.[48]

[48] Ontario Land Tribunal case number: OLT-24-000407

# Case study: Affordable housing in a mixed-heights residential area

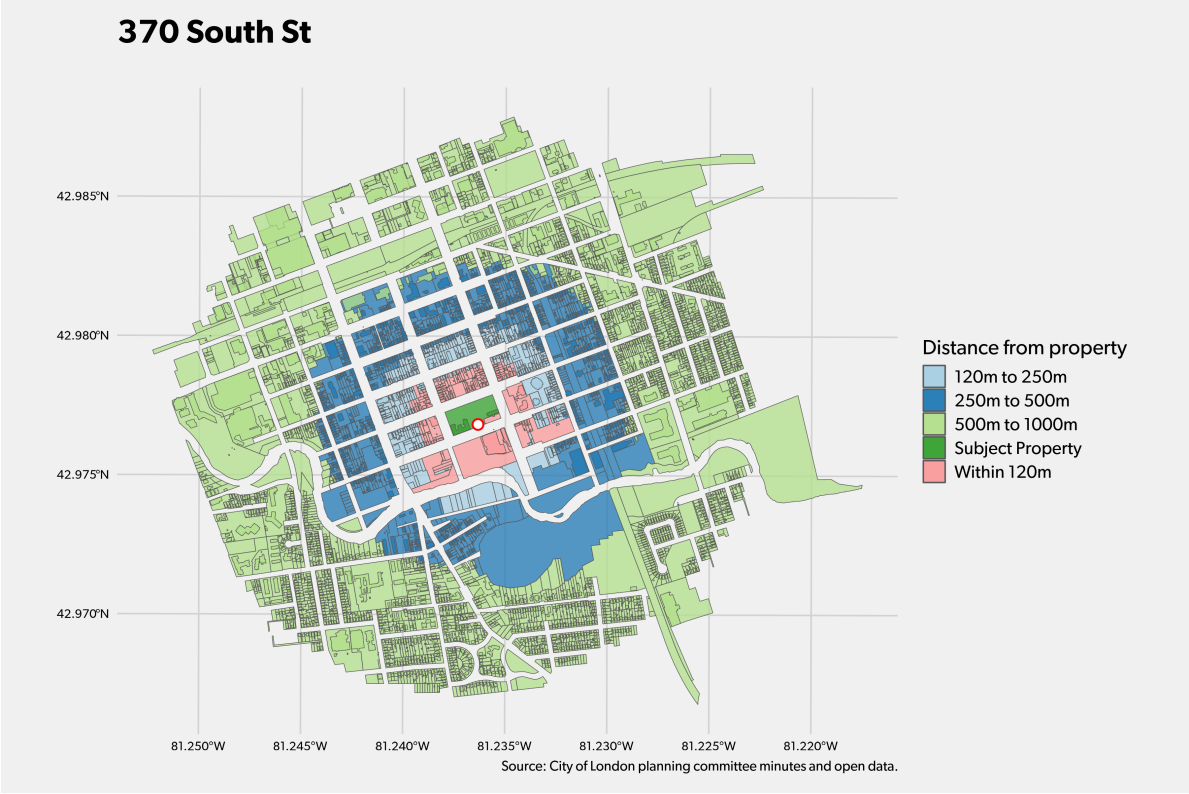


Figure 31: Map showing area around 370 South St.

- **Existing:** Former Old Victoria Hospital
- **Proposed development:** Six apartment buildings, from 5 to 11 storeys (694 homes)
- **Existing Zoning:** Residential R8
- **Proposed Zoning:** Residential R8

The site is located on the former grounds of the Old Victoria Hospital; the City of London acquired the buildings on the site when the hospital closed. An earlier Old Victoria Hospital

Lands Secondary Plan was developed and passed by city council in 2014 to establish a high-level vision for redevelopment of the site, which envisioned a mixed-use residential and commercial development with high-rise, mid-rise and low-rise buildings (City of London 2021: p. 6-7). The site was subsequently acquired by an alliance of affordable housing developers, called the Vision Soho Alliance (Baleeiro 2024), who proposed to build several apartment buildings, totaling 694 homes, more than 300 of which are proposed to be affordable. The staff report on the application recommended the majority of the requested official plan and zoning changes but refusal of one aspect (relief from the ground floor commercial requirements). One of the more significant changes, in terms of the proposed built form, was to change some official plan designations from low-rise residential to mid-rise residential. The same report noted that concerns raised during public engagement included:

- An increase in open space within the development specifically highlighting the possibility of a dog park.
- The inclusion of a grocery store within the development.
- An increase in the provided parking to avoid over-subscription of street parking.
- Changes to the massing of the building at 124 Colborne Street to move the 11-storey portion to the north of the property. (City of London 2021: p. 7)

The proposal was considered by the planning and environment committee on 22 November 2021. Figure 31 shows the surrounding buildings and parcels, but the locations of speakers are not included in the minutes. There were three speakers at the public participation meeting, including the representative of the applicant, the Vision Soho Alliance. The committee voted 6-0 to approve the changes to the official plan and zoning by-law. City council approved the committee recommendation unanimously, at its meeting on 7 December 2021.[49]

[49] Disclaimer: the author served on council when this matter was considered and voted in favour of the proposed changes.

# Summary and next steps

Conflict over proposed land use changes recurs throughout the time period studied in this report. Among the hundreds of decisions that planning committee makes in a typical year, there are many examples of the kind of NIMBY opposition that Fischel (2001) describes, with homevoters in low density areas mobilizing to oppose higher density residential infill projects, both in terms of the local scale of the opposition and the nature of the concerns articulated by residents. And yet, planning committee rarely goes against planning staff advice, which is often to approve the proposed residential intensification. For those residents who mobilized to oppose a specific residential infill project, being heard at committee but not succeeding in stopping the proposed change can lead to disillusionment with the planning process, with elected officials and with local government in general. The strong negative emotions expressed by some residents, even in the context of a public participation meeting format and approach to paraphrasing comments that is likely to moderate those comments, is a concerning phenomenon, if the goal of land use policymakers is not just to build new homes but to strengthen support for residential infill over time. Maintaining the status quo approach to zoning and public participation meetings is likely to continue to generate these site-specific conflicts, emotions and policy outcomes.

Encouragingly, there are examples of residential infill projects that were approved with little or no opposition. These examples, such as the high-rise developments on a surface parking lot (455 Clarence St), a two storey parking structure (300-320 King St) and a former hospital site (370 South St]), show that it is possible to build residential infill without significant opposition. However, waiting for the private or non-profit sector to propose and execute such projects is not sufficient. A proactive and targeted approach to encouraging and incentivizing this kind of residential infill is needed.

The City of London has made some promising changes in recent years to prioritize residential intensification, such as the London Plan, allowing four residential units-as-of-right and its updating its zoning by-law. The following recommendations are intended to build on those decisions to accelerate the pace of residential infill while also increasing social licence for residential infill.

# Recommendations

## Recommendation #1: A collaborative effort focused on housing

The Whole of Community System Response to Health and Homelessness demonstrates many of the features of a collaborative governance regime: dozens of organizations and hundreds of people attended the summit process and the city has committed to an ongoing whole of community approach (Dickins 2023; Emerson and Nabatchi 2015). Starting and sustaining such a collaborative effort is very challenging. Yet building more homes, especially residential infill, would benefit from a similarly collaborative approach to systems change. Including the people who are most affected by the housing affordability crisis, especially younger generations, as well as the people who are most likely to oppose infill residential housing, may lead to stronger support for residential infill over time. Although establishing such a collaborative effort would take time and resources, given the scale of the housing affordability challenge and the fractious nature of the current approach, it is worth pursuing.

## Recommendation #2: More permissive zoning for missing middle and mid-rise residential

Through the combination of place types and street types, the London Plan directs greater residential intensification towards parcels located on major roads. But until the zoning by-law is updated to permit the range of missing middle and mid-rise residential buildings envisioned in the London Plan, site-specific conflict on relatively modest residential infill is likely to continue. Building on its move to permit four residential units as-of-right, the zoning by-law update should be accelerated.

## Recommendation #3: Focusing infill on underutilized lands

As recommended in Helmer (2023), residential infill on commercial properties such as mall parking lots and underutilized municipal or private surface parking lots may generate less opposition than proposals to build on low-density residential lands do. This kind of infill brings homes closer to major employment centres, which has the potential for additional reductions in congestion and commute times, and has the benefit of substantially limiting the disruption from construction to interior renovations.

## Recommendation #4: Infill through conversions

Conversion of vacant or underutilized office buildings to residential, as recommended in Helmer (2023), has the benefit of substantially limiting the disruption from construction to interior renovations. Similar to new buildings on commercial lands or surface parking lots, this kind of infill also reduces the distance between homes and major employment centres.

## Recommendation #5: Following up afterwards

At the time of a residential infill development is proposed, uncertainty and fear, often about property values decreasing or quality of life decreasing, is at a high point. This time period is also the focal point for the municipality in terms of land use policy. Follow up by the municipality *after* developments have been built and occupied, with both the residents of the new homes and the residents of the pre-existing homes, could demonstrate the benefits of residential infill and strengthen support for residential infill overall.

## Recommendation #6: Recognizing and celebrating success

Not all residential infill projects are equal. As in any area of business activity, some businesses are better than others in terms of how they plan buildings, engage residents, build the actual building(s) and, in the case of landlords, maintain those buildings. A meaningful award program designed to recognize exemplary residential infill projects may provide a positive feedback effect that improves how residential infill projects are planned and executed over time. The Urban League of London's Green Umbrella and Green Brick Awards, London Heritage Awards (awarded by ACO London), and the Urban Design Awards (awarded by the City of London) are examples of existing awards that recognize excellent in either environmental contribution or heritage conservation. A new award program focused specifically on residential infill could be a way to recognize and celebrate success in this area.

## Recommendation #7: A focused, proactive strategy for built heritage

Proponents of conserving built heritage often support residential infill proposals on underutilized land or involving adaptive re-use of heritage buildings. However, they are often opposed to residential infill development that is perceived to threaten built heritage resources. A focused, proactive strategy to acquire and conserve built heritage resources,

and to encourage their redevelopment as new residential homes, will help to build social licence for residential infill. This strategy could include a dedicated fund for acquiring built heritage resources and/or a program to incentivize the adaptive re-use of built heritage resources for residential purposes, building on the existing city-wide Heritage Community Improvement Plan.

## How might the future be different?

Realizing the vast potential of the vacant residential land in the city will require a concerted effort to improve social licence for residential intensification. Given the city's targets for growth in new homes, including affordable homes, a whole of community collaborative approach to housing is needed. Not just on homelessness, but for the housing system as a whole (see Recommendation 1).

Opposition to residential intensification is common but it is not guaranteed or uniform. In some of the case studies described in this report, such as high-rise developments on a surface parking lot (455 Clarence St), a two storey parking structure (300-320 King St) and a former hospital site (370 South St]), there was **little or no opposition** to the proposed residential intensification. Going beyond approving land use permissions to actively incentivizing and encouraging development of underutilized land or buildings is key to achieving residential intensification that builds, rather than degrades, social licence for infill (see Recommendation 3 and Recommendation 4).

In other cases, such as the four storey apartment buildings at 1494 Commissioners Rd West (10 new homes) and 420 Fanshawe Park Rd E (142 new homes) proposed near low density residential neighbourhoods, there was strong opposition to the proposed developments. Having adopted the London Plan, which directs residential intensification along streets according to the combination of their place type and street type, conflicts like the ones described for 1494 Commissioners Rd West and 420 Fanshawe Park Rd East are likely to recur. As the city works through the update to its zoning by-law, ensuring that these mid-rise residential developments are enabled through comprehensive and permissive zoning will be key to avoiding repeated future site-specific conflicts over relatively modest residential intensification (see Recommendation 2). In cases where there is site-specific conflict, following up after residential infill projects are completed may help to restore some of the support that was lost during the public participation process (see Recommendation 5). Similarly, highlighting the best-of-the-best when it comes to residential infill may inspire the private sector to improve the quality and execution of residential infill projects over time (see Recommendation 6).

| Category | Intensification | |
|---|---|---|
| | Built area | Greenfield |
| **Registered Plans** | | |
| 1. Registered Subdivision Plans | 336 | 3,839 |
| 2. Registered Reference Plans | 96 | 92 |
| 5. Registered Condo Plans | 311 | 589 |
| **Draft Approved** | | |
| 3. Draft Approved Subdivision Plans | 8,579 | 12,777 |
| 6. Draft Approved Condo Plans | 41 | 487 |
| **Under Review** | | |
| 4. Submitted Under Review Subdivision Plans | 4,192 | 13,449 |
| 7. Submitted Under Review Condo Plans | 16 | 95 |
| **Other** | | |
| 8. Potential Development | 11,227 | 2,821 |
| 9. Official Plan Designations | 22,167 | 31,298 |
| 10. Site Plans | 9,913 | 5,227 |

Source: City of London Vacant Land Inventory, 31 March 2025.

Table 2: Estimated number of residential units by category, City of London Vacant Land Inventory.

In the case of the 100 Fullarton St development (703 new homes) and the case of the redevelopment of 370 South St (694 new homes), there are significant built heritage resources involved. In the former, there was a significant number of speakers at the public participation meeting, most of them concerned about the impacts on built heritage. In the second, the City of London played an active role in acquiring and conserving the most important built heritage resources (although the non-profits are doing the hard work of repurposing them into affordable housing). A focused, proactive strategy to acquire and conserve built heritage resources, and to encourage their redevelopment as new residential homes, will help to build social licence for residential infill (see Recommendation 7).

The scale of the opportunity over the next decade is significant. The City of London has a vacant land inventory (VLI) that tracks vacant land in the city, including land that is designated for residential use. The VLI is updated regularly and is used to inform the city's growth management strategy. Table 2 shows the VLI as of March 31, 2025 by category. The VLI shows that there are 1,746 hectares of vacant residential land in the city. There is tremendous opportunity to build more homes to meet the housing needs of Londoners, especially younger generations.

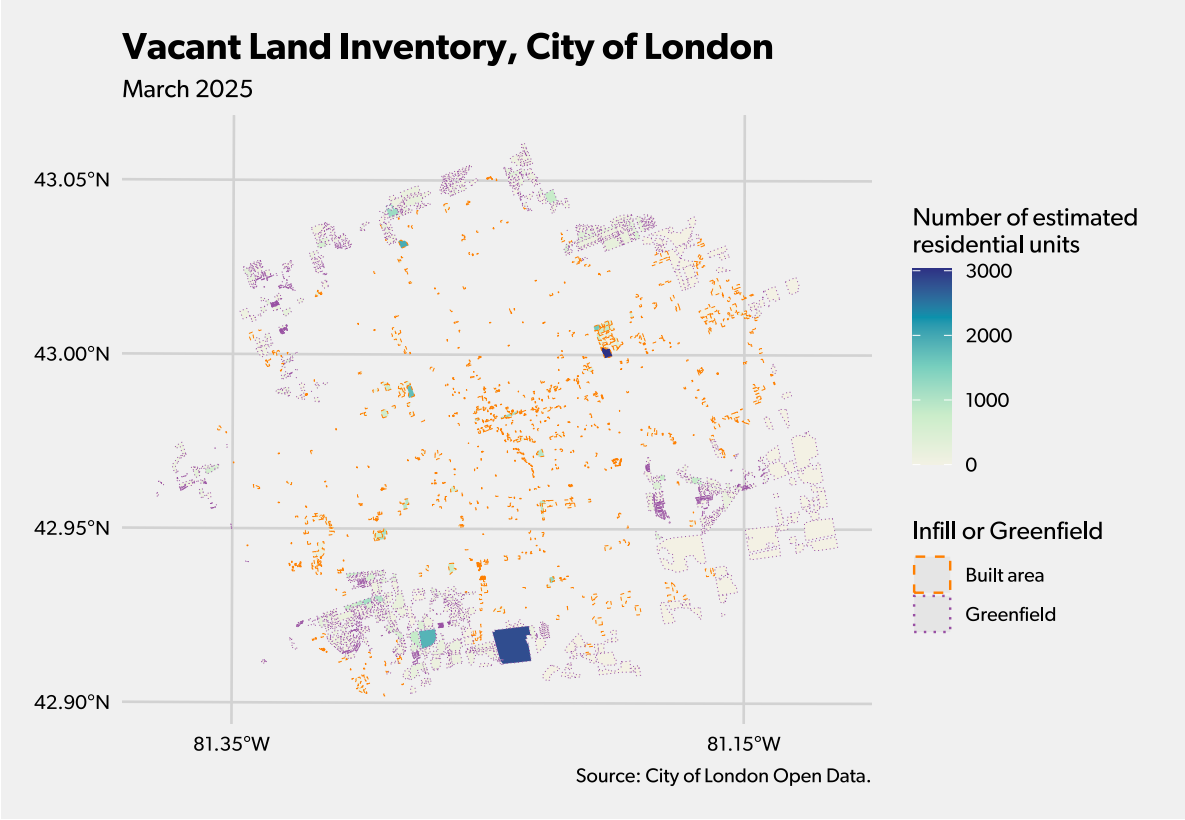


Figure 32: Estimated residential units on vacant land within and outside the built area boundary, as of 31 Mar 2025.

However, as shown in Figure 32, the vacant residential land is not evenly distributed throughout the city. The majority of the vacant residential land is located in the North and Southwest areas of the city, with many small parcels throughout the built area. The large residential developments at Highbury Road and Oxford St and north of Oxford St near Proudfoot Lane are notable exceptions. This means that residential intensification is likely to come through many projects on many parcels of land, rather than a few large projects. Improving social licence for residential infill is key to adding the more affordable, more climate-friendly homes, close to jobs, schools and social and cultural amenities, that Londoners need.

# Appendix

## Data sources and collection

### Meetings, items and motions

To describe and analyze support and opposition to proposed infill housing projects, a dataset of matters considered by the City of London's Planning and Environment Committee (PEC) and City Council (Council) was constructed from the publicly-available minutes of PEC and Council meetings, starting on 12 December 2011. Using the *RSelenium* and *httr* packages (Harrison 2022; Wickham 2023), the minutes and PDF attachments were downloaded as HTML files, from which information about meetings and the decisions made at those meetings was extracted and reshaped into a dataset of motions (using the *rvest* and *pdftools* packages (Wickham 2024; Ooms 2025). In terms of the structure of the data, information on each meeting (n = 275) is extracted from a single HTML file.[50]

**Structure of meeting minutes**. Each **meeting** of a council committee or the full council has a date, a list of **voting members** who are present, a list of **items**, categorized into various **sections** of the agenda, which include Call to Order, Consent Items, Scheduled Items, Items for Direction, Deferred Matters / Additional Business and Confidential. Although there are many kinds of items, the focus of this study is on items related to land use policy. Primarily, these are site-specific applications to amend either or both of the Official Plan (OP) or the Zoning Bylaw (ZB) (Z-1). These land use applications contain several important elements. First, there is an **applicant**, usually, but not always, the property owner. Second, there is a **property location**, or description of the property, which is often one or more municipal addresses or a legal description of the property. Third, there are descriptions of the current land use policy (**existing zoning/land use designation**) and the proposed future land use policy (**proposed zoning/land use designation**). Applications to amend the OP or ZB are presented along with a planning analysis from staff and a staff recommendation, which can be to approve the requested amendment(s), in whole or in part,

[50] Because of a change in backend software used to produce the minutes, meetings between 12 December 2011 and 20 February 2018 are formatted one way and meetings after 20 February 2018 are formatted differently. This means that while the HTML files are downloaded in the same way, they are processed differently in R to reshape them into a common dataset.

or to refuse the application. At the committee and council level, decisions are made on **motions**, of which there is usually one per item; however, there can be more than one motion per item, especially for controversial items where there is disagreement amongst the members of the committee or the council. For most of the minutes in the time period, there is a voting record on all motions. For meetings early in the time period, only motions that passed are reported in the minutes and there is not a recorded vote showing which members voted in favour or against specific motions.[51]

Since the *Planning Act* requires Public Participation Meetings (PPMs) for proposed amendments to Official Plans and Zoning Bylaws, these matters are typically dealt with under Scheduled Items. For items with a PPM, the published minutes list the people who spoke during the PPM and paraphrase the main points raised by each identified speaker.

Because the minutes are written in a relatively consistent and structured way, it is possible to parse the published HTML minutes into a tabluar dataset of motions related to items in sections of the agenda for meetings. By geocoding the locations of items and speakers related to changes in land use policy, the motions dataset can be linked to other geospatial datasets.

## City of London open data

The City of London makes several open datasets available that are useful in this study, including:

- The **zoning map**, a geospatial dataset that provides current zoning information for the entire land area of the city.[52]
- A geospatial dataset of **addresses**, which provides points for municipal addresses and when those points were last updated. This is particularly helpful in detecting when municipal addresses are added (at the building level).
- A geospatial dataset of **vacant land**, called the Vacant Land Inventory (VLI), which provides the location, area and estimates of potential future residential units for vacant lands, and whether those parcels are within or outside of the built-area boundary. Many of these parcels described in the VLI are the subjects of land use decisions made by city council in the time period of this study. The VLI does *not* include *all* land parcels that are relevant for the purposes of this study, as some of the properties have been removed from the VLI (for example, when they are developed into residential housing).

[51] Voting records are included starting on August 30, 2013.

[52] To access City of London open data sets, see https://opendata.london.ca/

- A geospatial dataset of **parcels**, which provides the land area of specific parcels that are within the land use zones described in the zoning map. Through spatial operations, the zoning information can be added to the parcels.

## Census geospatial data

Using the R package *cancensus*, data from the Census of Population was obtained at different levels of geography (von Bergmann, Shkolnik, and Jacobs 2024). Through spatial join operations, property locations can be linked to the Dissemination Area (DA) that contains them, which is the lowest level of geography that most Census of Population data is reported. The lower level of Dissemination Block (DB) includes population and dwelling counts, but no other relevant data. Given the time period of the study, when linking to DAs, the precedent census boundaries were used (2011, 2016 or 2021) so the geospatial data would be as close, in time, as possible to the date decisions were made at committee or council. This approach has limitations, as intercensal changes are not captured during the intervening years between census dates; the farther the date of a decision is from its preceding census date, the less accurate the census data is likely to be.

## CMHC data on rents and housing starts

Using the R package *cmhc*, time series data on housing starts and rents were obtained at the census subdivision and census tract levels from the Starts and Completions Survey and the Rental Market Survey, respectively (von Bergmann 2025).

| | Number of rental units | | | | | Year-over-year change | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Year | Bachelor | 1 Bedroom | 2 Bedroom | 3 Bedroom + | Total | Bachelor | 1 Bedroom | 2 Bedroom | 3 Bedroom + | Total |
| 2024 October | 1,129 | 17,852 | 24,959 | 4,618 | 48,558 | 4 | 432 | 611 | 310 | 1,357 |
| 2023 October | 1,125 | 17,420 | 24,348 | 4,308 | 47,201 | 31 | -352 | -447 | -96 | -864 |
| 2022 October | 1,094 | 17,772 | 24,795 | 4,404 | 48,065 | 1 | 340 | -8 | 89 | 422 |
| 2021 October | 1,093 | 17,432 | 24,803 | 4,315 | 47,643 | 14 | 197 | 722 | 8 | 941 |
| 2020 October | 1,079 | 17,235 | 24,081 | 4,307 | 46,702 | 4 | 415 | 322 | 72 | 813 |
| 2019 October | 1,075 | 16,820 | 23,759 | 4,235 | 45,889 | -4 | 57 | 311 | -38 | 326 |
| 2018 October | 1,079 | 16,763 | 23,448 | 4,273 | 45,563 | -36 | 306 | 351 | 249 | 870 |
| 2017 October | 1,115 | 16,457 | 23,097 | 4,024 | 44,693 | 32 | 227 | 332 | 67 | 658 |
| 2016 October | 1,083 | 16,230 | 22,765 | 3,957 | 44,035 | -1 | 89 | 1,007 | 45 | 1,140 |
| 2015 October | 1,084 | 16,141 | 21,758 | 3,912 | 42,895 | -28 | 219 | 112 | 143 | 446 |
| 2014 October | 1,112 | 15,922 | 21,646 | 3,769 | 42,449 | 4 | -1 | 104 | -22 | 85 |
| 2013 October | 1,108 | 15,923 | 21,542 | 3,791 | 42,364 | 3 | 44 | 15 | -15 | 47 |
| 2012 October | 1,105 | 15,879 | 21,527 | 3,806 | 42,317 | -16 | 105 | 142 | -125 | 106 |
| 2011 October | 1,121 | 15,774 | 21,385 | 3,931 | 42,211 | 23 | 325 | 321 | 114 | 783 |
| 2010 October | 1,098 | 15,449 | 21,064 | 3,817 | 41,428 | 22 | 230 | 233 | 11 | 496 |

Table 3: Composition of rental stock and year-over-year change in rental stock, by number of bedrooms.

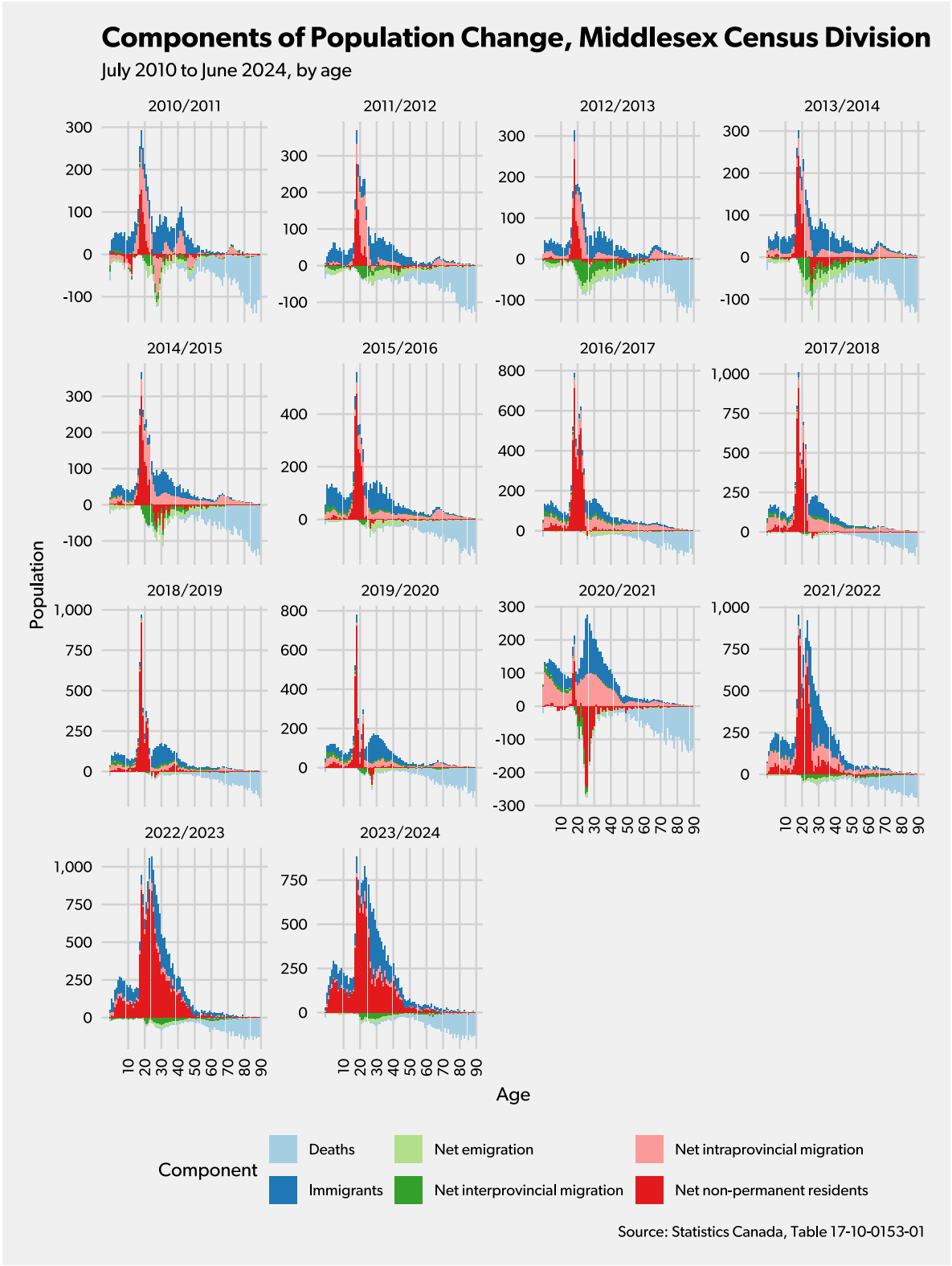


Figure 33: Components of population change, 2011 to 2024, by age.

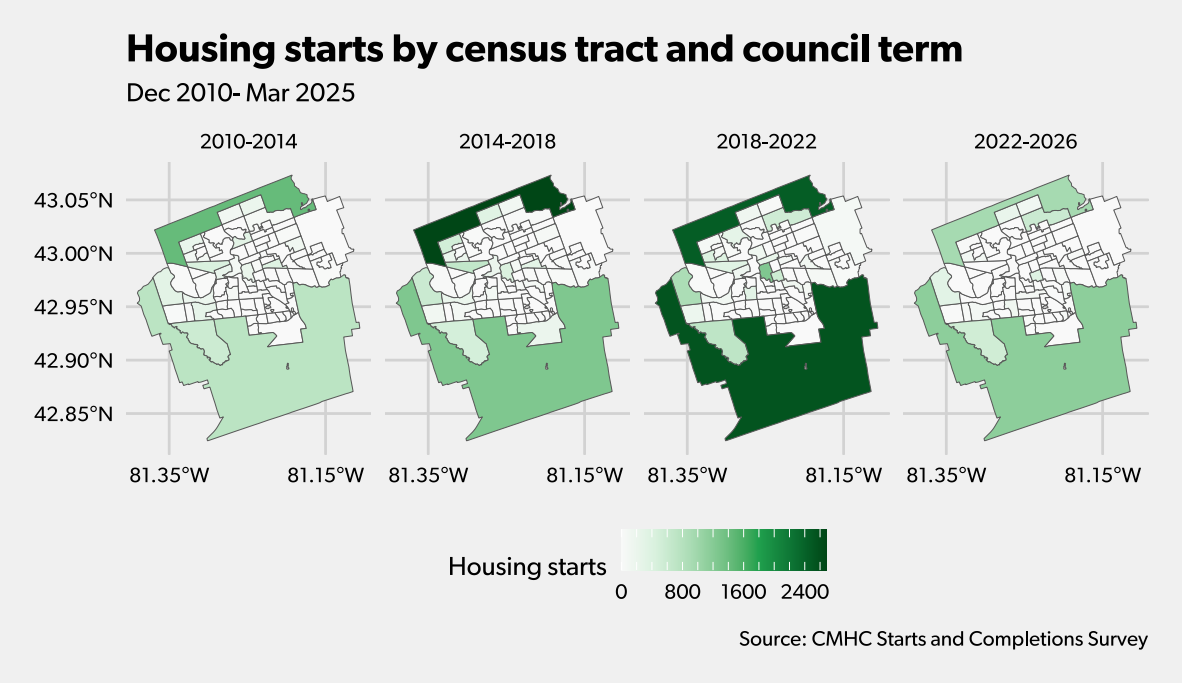


Figure 34: Housing starts in London by census tract and council term, 2010-2025.

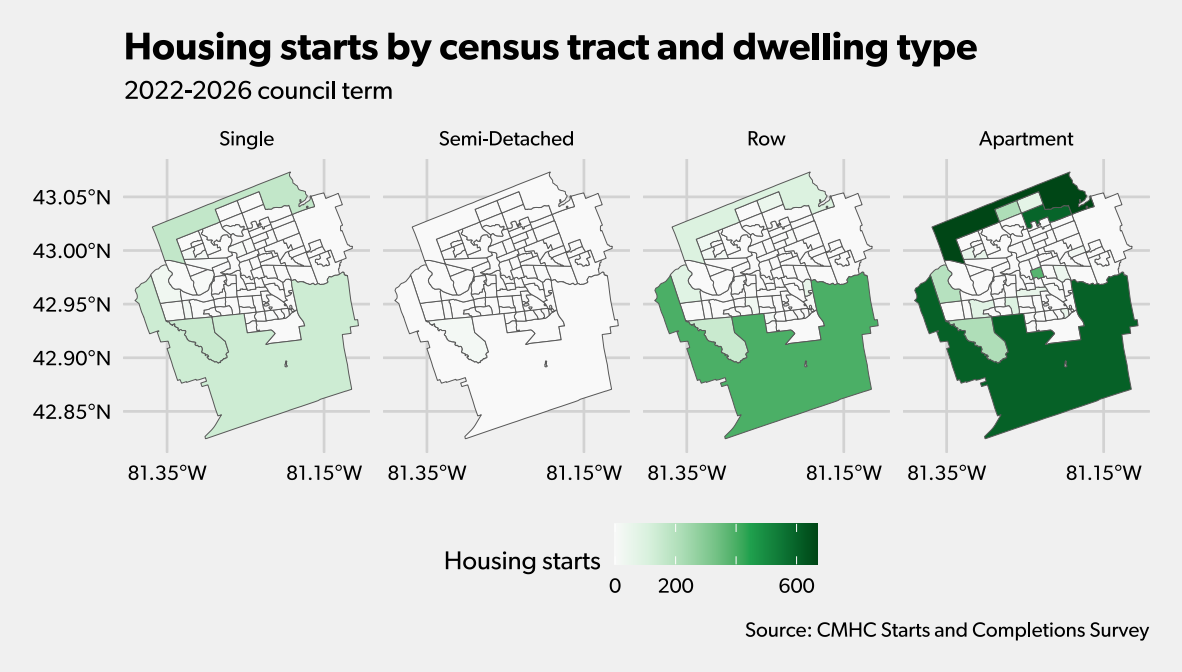


Figure 35: Housing starts in London by census tract and dwelling type, 2022-2026 term.

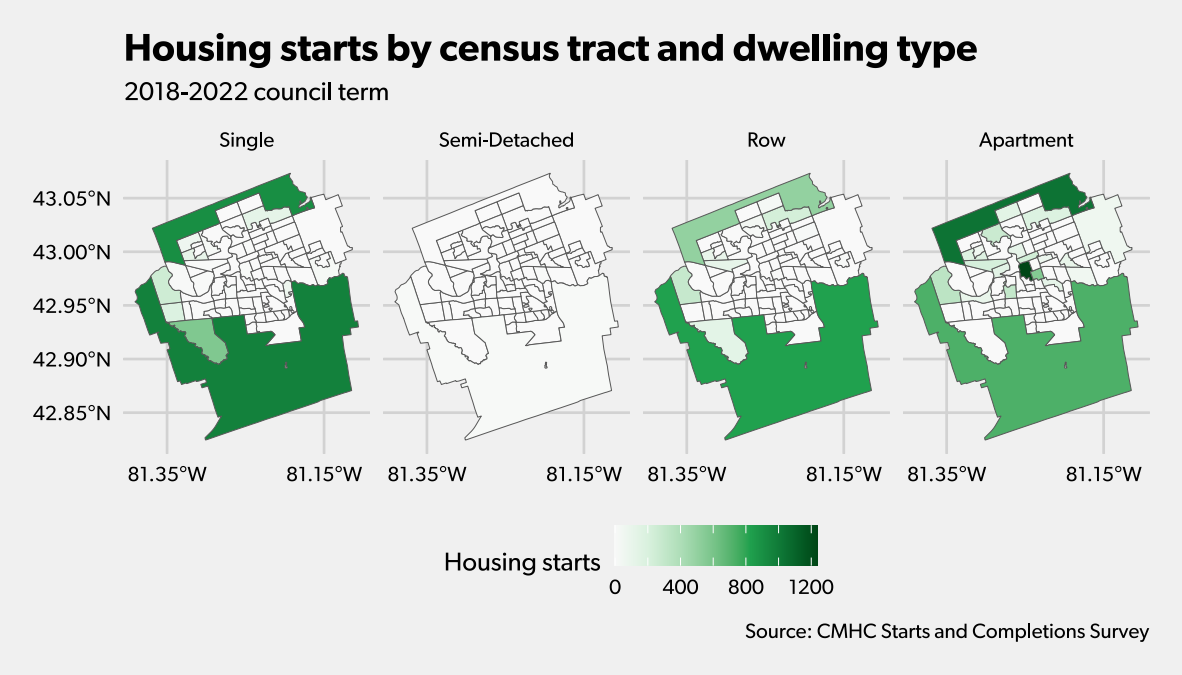


Figure 36: Housing starts in London by census tract and dwelling type, 2018-2022 term.

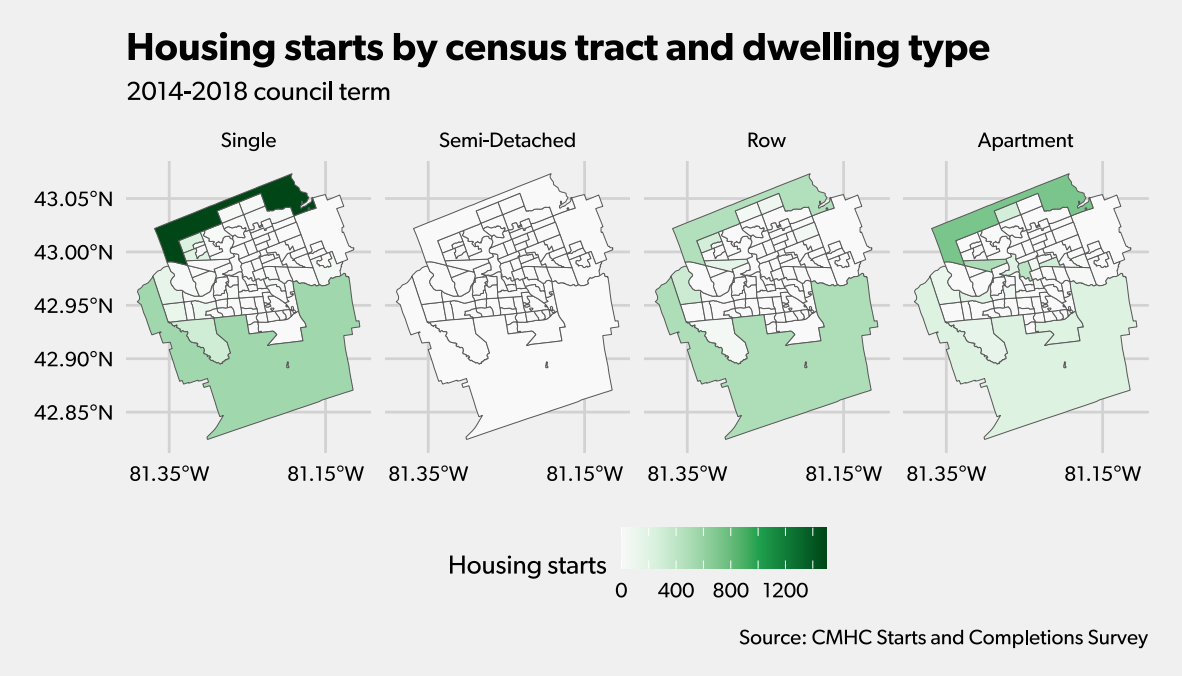


Figure 37: Housing starts in London by census tract and dwelling type, 2014-2018 term.

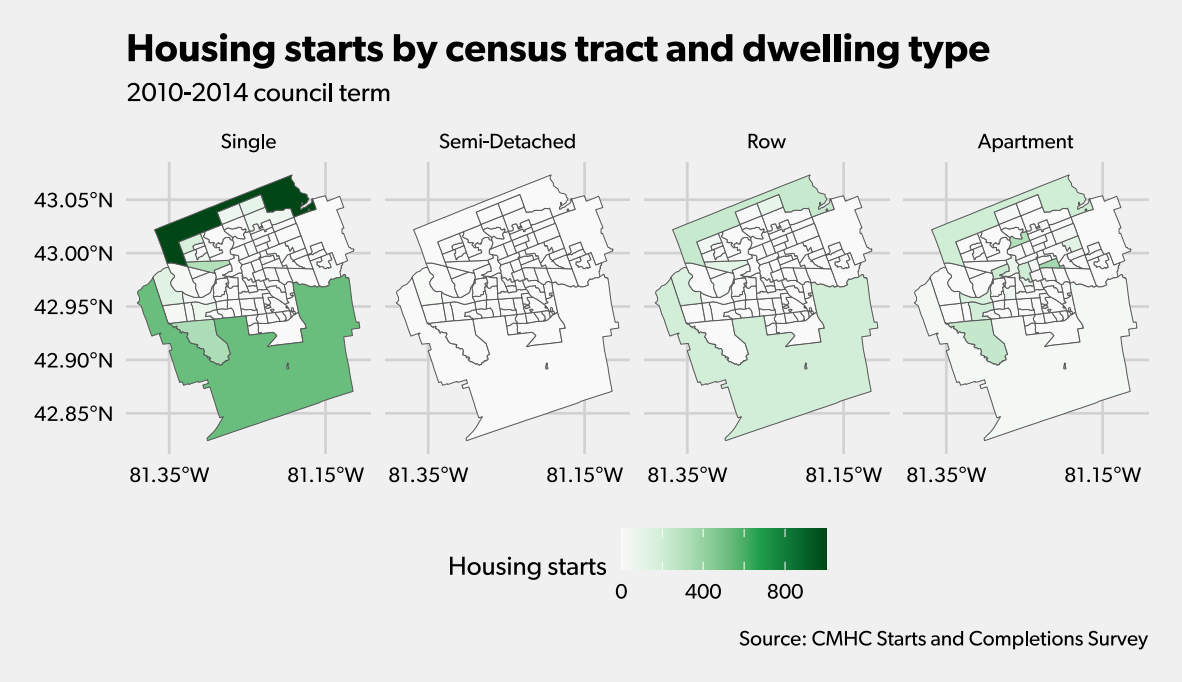


Figure 38: Housing starts in London by census tract and dwelling type, 2010-2014 term.

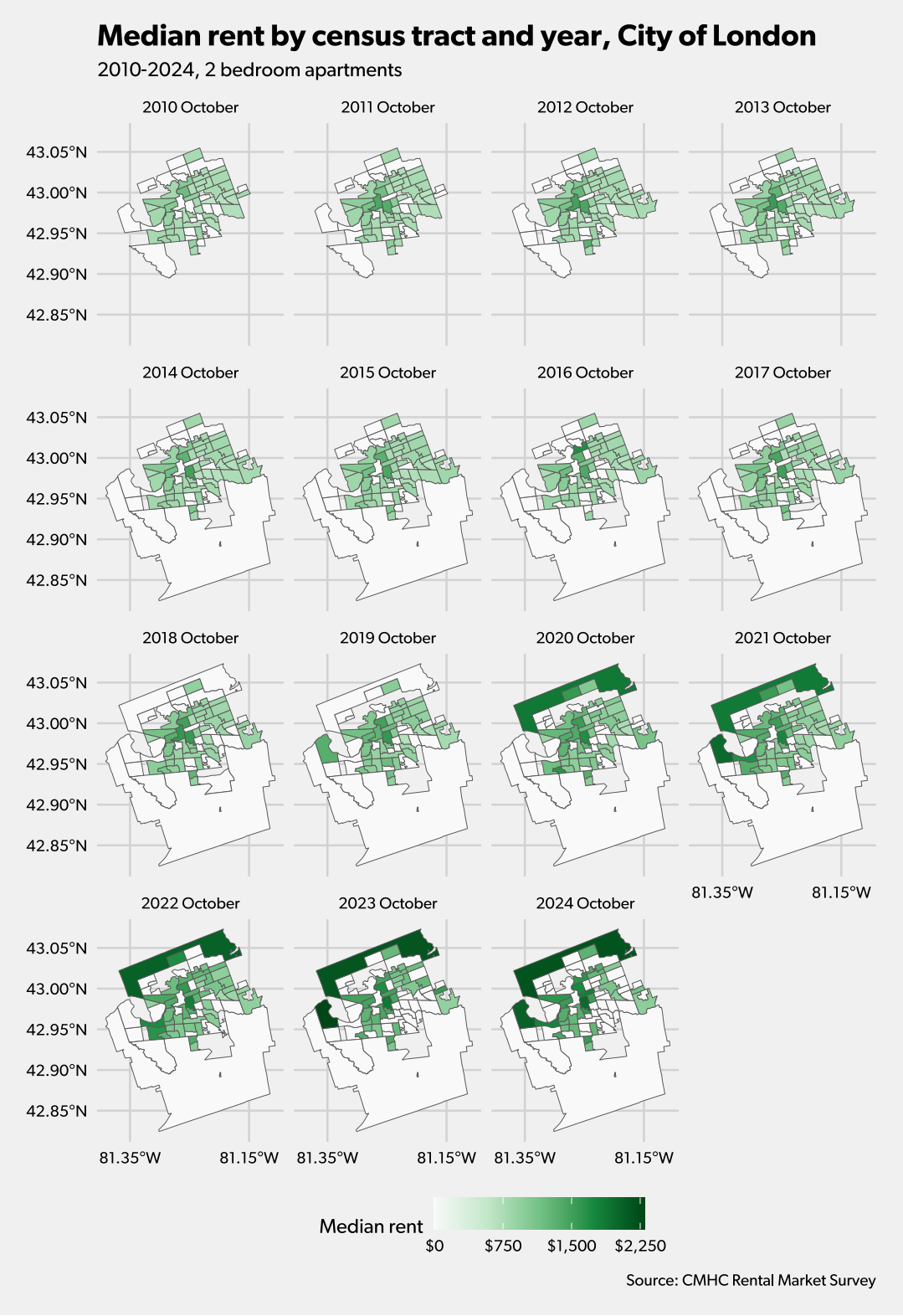


Figure 39: Median rent in London by census tract and year

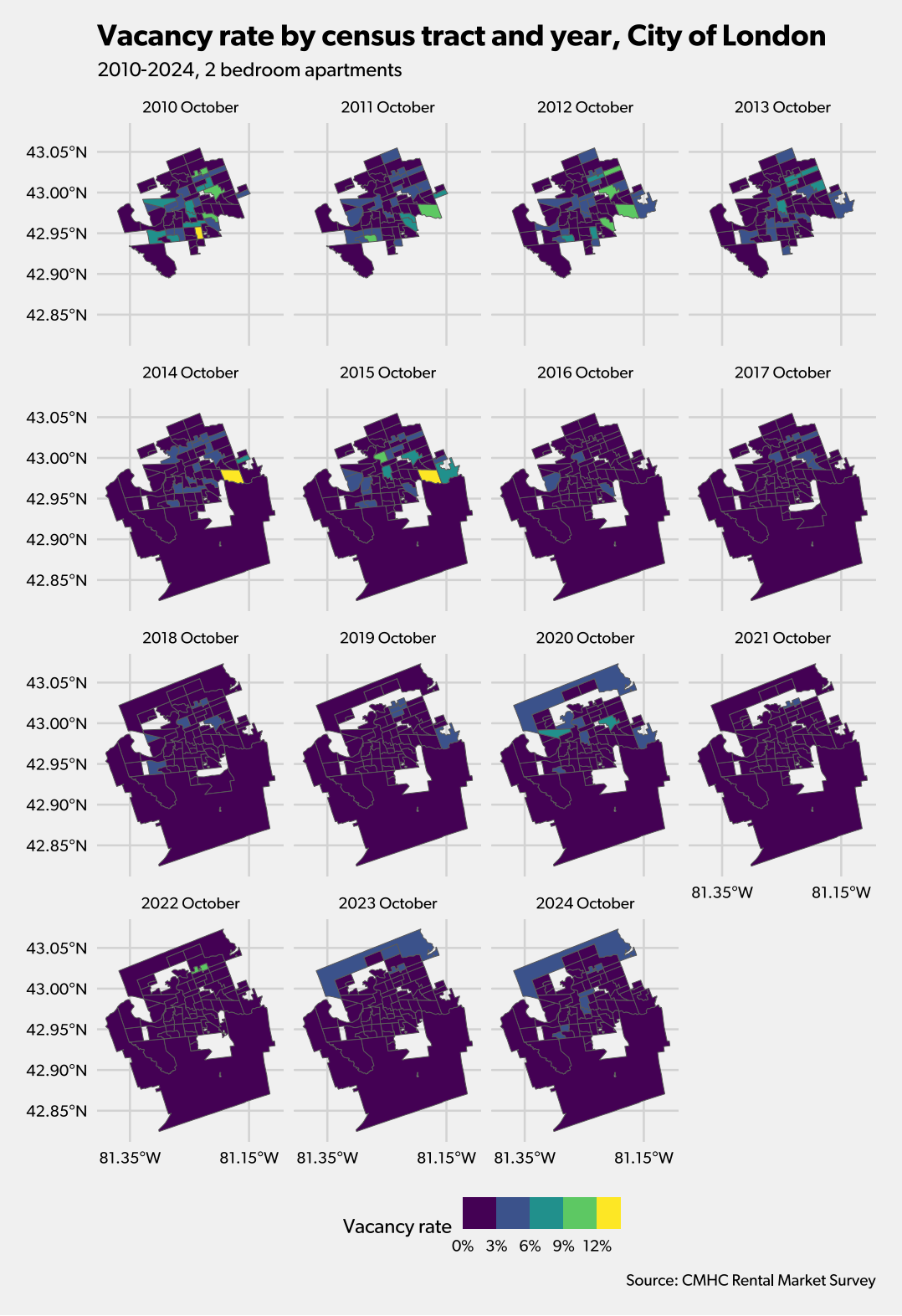


Figure 40: Vacancy rate in London by census tract and year

| Label | Value | Percent of total |
|---|---|---|
| **Housing tenure** | | |
| Owner | 101,555 | 58.1% |
| Renter | 73,100 | 41.9% |
| **Age of household maintainer** | | |
| 15 to 24 years | 7,345 | 4.2% |
| 25 to 34 years | 28,655 | 16.4% |
| 35 to 44 years | 29,795 | 17.1% |
| 45 to 54 years | 29,220 | 16.7% |
| 55 to 64 years | 32,830 | 18.8% |
| 65 to 74 years | 26,350 | 15.1% |
| 75 to 84 years | 14,760 | 8.5% |
| 85 years and over | 5,700 | 3.3% |
| **Shelter costs** | | |
| Spending less than 30% of income on shelter costs | 131,505 | 75.8% |
| Spending 30% or more of income on shelter costs | 42,015 | 24.2% |
| 30% to less than 100% | 37,610 | 21.7% |
| Spending 30% or more of income on shelter costs only | 36,930 | 21.1% |
| **Housing indicators** | | |
| Not suitable only | 7,465 | 4.3% |
| Major repairs needed only | 6,030 | 3.5% |
| 'Spending 30% or more of income on shelter costs' and 'not suitable' | 2,200 | 1.3% |
| 'Spending 30% or more of income on shelter costs' and 'major repairs needed' | 2,700 | 1.5% |
| 'Not suitable' and 'major repairs needed' | 635 | 0.4% |
| 'Spending 30% or more of income on shelter costs' and 'not suitable' and 'major repairs needed' | 185 | 0.1% |
| Acceptable housing | 118,515 | 67.9% |
| **Household size** | | |
| Private households by household size | 174,660 | 100.0% |
| 1 person | 54,230 | 31.0% |
| 2 persons | 58,315 | 33.4% |
| 3 persons | 25,470 | 14.6% |
| 4 persons | 22,415 | 12.8% |
| 5 or more persons | 14,225 | 8.1% |

Source: Census of Population, 2021.

Table 4: Age, housing and migration statistics, City of London.

| Label | Value | Percent of total |
|---|---|---|
| **Median income** | | |
| Median total income in 2020 among recipients ($) | 39,600 | NA |
| Median after-tax income in 2020 among recipients ($) | 36,000 | NA |
| **Migration in the past 5 years** | | |
| Non-movers | 220,255 | 55.7% |
| External migrants | 31,140 | 7.9% |
| Intraprovincial migrants | 44,255 | 11.2% |
| Interprovincial migrants | 8,370 | 2.1% |
| **Household income by groups** | | |
| Household total income groups in 2020 for private households | 174,655 | 100.0% |
| Under $5,000 | 2,545 | 1.5% |
| $5,000 to $9,999 | 1,255 | 0.7% |
| $10,000 to $14,999 | 2,620 | 1.5% |
| $15,000 to $19,999 | 4,145 | 2.4% |
| $20,000 to $24,999 | 6,735 | 3.9% |
| $25,000 to $29,999 | 6,525 | 3.7% |
| $30,000 to $34,999 | 6,355 | 3.6% |
| $35,000 to $39,999 | 6,785 | 3.9% |
| $40,000 to $44,999 | 7,050 | 4.0% |
| $45,000 to $49,999 | 7,310 | 4.2% |
| $50,000 to $59,999 | 14,470 | 8.3% |
| $60,000 to $69,999 | 13,480 | 7.7% |
| $70,000 to $79,999 | 12,505 | 7.2% |
| $80,000 to $89,999 | 11,305 | 6.5% |
| $90,000 to $99,999 | 10,105 | 5.8% |
| $100,000 to $124,999 | 20,075 | 11.5% |
| $125,000 to $149,999 | 13,550 | 7.8% |
| $150,000 to $199,999 | 14,935 | 8.6% |
| $200,000 and over | 12,910 | 7.4% |

Source: Census of Population, 2021.

Table 5: Selected income statistics, City of London.

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