

PLANNING JUSTIFICATION **REPORT**

OFFICIAL PLAN AMENDMENT &
ZONING BY-LAW AMENDMENT

50 King Street and 399 Ridout Street North
City of London

Date:

May 2023

Prepared for:

50 King Street London Limited

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Our File 1094'BC'

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1.0 INTRODUCTION

1.1 Overview

MHBC has been retained by 50 King Street London Limited to assist with applications to amend the City of London Official Plan (The London Plan) and City of London Zoning By-law No. Z.-1 in support of a redevelopment proposal for lands addressed as 50 King Street and the southern portion of 399 Ridout Street North, London (the 'Site'). The intent of these applications is to permit a mixed-use, high-rise development on the Site.

The subject lands measure approximately 8,015.1 m² in area and are located at the northwest corner of King Street and Ridout Street North. These lands are situated within the Central London planning district and downtown London, and are designated under Part V of the *Ontario Heritage Act* (OHA) as a part of the Downtown London Heritage Conservation District. Further, 399 Ridout Street North, which contains the Old Middlesex Courthouse and Gaol, is a National Historic Site of Canada, is subject to a Heritage Easement and is individually designated under Part IV of the OHA. For the purposes of this Report, the interconnected courthouse and jail buildings located on this property are referred to collectively as the 'Middlesex County Court House and Gaol'.

Zedd Architects has prepared a design concept for the Site in support of several core project objectives. Most notably, the proposal is intended (1) to provide an intensive, mixed-use development in a prominent downtown core location and (2) to redevelop the Site in a manner that is sensitive to surrounding features. Generally, the proposed development concept incorporates two high-rise towers connected via a three to four storey shared podium, four levels of structured parking and outdoor plaza space. No modifications are proposed to the existing buildings located on the northern portion of 399 Ridout Street North.

The planning merits of this proposal are evaluated within this Report and are summarized below:

- The project supports the redevelopment of lands in the City's downtown that are designated for high density residential, office and commercial uses and are located within a Protected Major Transit Station Area;
- The Site is appropriate for this development proposal considering its physical characteristics, its location within an established mixed-use development area and its proximity to existing offices, retail/service commercial enterprises, government activities, recreational, entertainment and cultural facilities, parks, public transit services and the planned Bus Rapid Transit (BRT) system;

- The massing, orientation and articulation of the proposed high-rise development is designed: to be compatible with surrounding land uses, to complement the local development context and to promote compact, efficient development. Additionally, design elements integrated into the proposal promote an attractive and prominent building form that would contribute positively to the local streetscape and establish a landmark development for the Forks of the Thames activity area and, more broadly, downtown London;
- The number and range of apartment units planned for the upper floors of the towers would broaden housing choice within Central London and respond to market demand. In effect, this project would help the City accommodate its forecasted population growth and achieve its projected housing requirements;
- The office/commercial uses intended for the podium component of the project would complement the local development setting, while also contributing to the downtown's planned function as the highest-order, mixed use centre within the City;
- Preliminary assessments indicate that existing road network can accommodate the proposed development and that adequate servicing infrastructure is available to service this project; and
- In our opinion, this proposal: is consistent with the Provincial Policy Statement; has regard for the principles and policy objectives of The London Plan; and aligns with the design direction of the City's Placemaking Guidelines and Downtown Plan.

1.2 Report Framework

This Planning and Design Report has been prepared for submission to the City of London in support of the aforementioned Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) applications. The Report includes the following primary components:

- An introduction and general description of the subject lands, surrounding uses and existing conditions to provide an understanding of the locational context;
- A summary of the concept plan prepared for the Site, including an overview of the core design elements associated with the development proposal;
- A review of the planning permissions applicable to the property; and
- An assessment of the proposal relative to: (1) the policy framework of the Provincial Policy Statement and The London Plan; and (2) the development regulations of the City's Zoning By-law.

The following documents were primary references reviewed in the preparation of this Report:

- Provincial Policy Statement;
- City of London Official Plan (The London Plan);
- City of London Zoning By-law Z.-1;
- Our Move Forward (London's Downtown Plan);
- Downtown Design Study – Design Guidelines;
- The Thames Valley Corridor Plan;
- One River Master Plan Environmental Assessment Study;
- Core Area Action Plan; and
- Downtown Heritage Conservation District Plan.

1.3 Planning Applications

Our analysis has confirmed that the following applications are required to permit the proposed development:

Table 1.0 – Required Planning Applications

Planning Application	Approval Authority
Official Plan Amendment to permit high-rise forms having a maximum height of 53 storeys in the context of the Downtown place type.	City of London
Zoning By-law Amendment to permit high-rise towers having a maximum height of 176 m and a maximum residential density, with equivalent non-residential units, of 1,175 units/ha within the Downtown Area (DA2) Zone structure.	City of London
Site Plan Approval (future application)	City of London

A Pre-Application Consultation meeting was held with City of London staff on October 25, 2021 to review the submission requirements for the development concept. As set out in the associated Record of Pre-Application Consultation, the following reports have been prepared in support of the proposal and are enclosed with the OPA and ZBA applications:

- Planning and Design Report;
- Heritage Impact Assessment;
- Stage 1-2 Archaeological Assessment;
- Tree Preservation Plan;
- Transportation Impact Assessment;
- Noise Impact Study;
- Pedestrian Wind Comfort Assessment;
- Preliminary Water Servicing Brief;

- Preliminary (Sanitary) Servicing Brief; and
- Storm Water Management Plan.

2.0 SITE LOCATION AND SURROUNDING LAND USES

2.1 Site Description

The subject lands are comprised of the entirety of 50 King Street and the southern portion of 399 Ridout Street North. As discussed, the Site is located at the northwest corner of King Street and Ridout Street North and forms part of the Central London planning district and the City's downtown core (refer to **Figure 1** to this Report).

The Site is generally rectangular in shape, measures approximately 0.801 ha in area and includes approximately 61.8 m of frontage on Ridout Street North and approximately 132.6 m of flankage on King Street (all measurements herein are approximations). The Site formerly contained a three storey office building (addressed as 50 King Street) and surface parking; however, the Site has been cleared for redevelopment.

The subject lands are designated under Part V of the OHA as part of the Downtown Heritage Conservation District. Furthermore, the Middlesex County Court House and Gaol is individually designated under Part IV of the OHA, has a heritage easement, and is a National Historic Site. This easement applies to the existing courthouse located on the north portion of this property and the lands directly surrounding the building.

The subject lands are currently accessed by pedestrian connections along Dundas Street, Ridout Street North and King Street. Vehicular access is provided via one access point to King Street, which connects to a surface parking field located on 399 Ridout Street North and Ivey Park. Internal to the Site, the lands slope towards the Thames River with multiple retaining walls provided in the parking field to address grade changes.

2.2 Surrounding Land Uses

The subject lands form part of the 'Central London' planning area in the City's downtown core. The downtown core is comprised of a diverse mix of intensive land uses, including residential, commercial/office, retail/service, government, recreational, entertainment and cultural facilities. The Site is located in proximity to a variety of these downtown land uses including major civic attractions, such as Covent Garden Market, Budweiser Gardens, the Grand Theatre, Victoria Park, Museum London, the Forks of the Thames Interpretative Centre, Ivey Park and the Thames Valley Parkway. Additionally, the subject lands are proximate to several high-rise



Figure 1
General Location
Plan

LEGEND



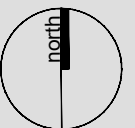
Subject Lands

DATE: February, 2023

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50 King Street
City of London
Ontario

Source:
2022 Aerial Imagery, City of London

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forms, including towers south of the Site (19 and 21 King Street, 320 Thames Street) and the multi-tower development located at the southeast corner of the King Street/Ridout Street North intersection (65-71 King Street and 330-350 Ridout Street North).

Table 2.0 summarizes the mix of uses in the vicinity of the subject lands.

Table 2.0 – Surrounding Land Uses

Relative Location	Existing Land Uses
TO THE NORTH:	Middlesex County Court House; Dundas Street corridor; Museum London (421 Ridout Street North); lands planned for a 40 storey high-rise development (435-451 Ridout Street North).
TO THE EAST:	Ridout Street North corridor; surface parking (public and private); Budweiser Gardens.
TO THE SOUTH:	King Street corridor; Two to three storey offices; high-rise buildings (21 and 19 King Street; 320 Thames Street).
TO THE WEST:	Ivey Park, including Thames Valley Parkway walking trail; Thames River and King Street pedestrian bridge; HMCS Prevost (National Defense); Labatt Park, Mitchell A. Baran Park and River Forks Park.

Adjacent to the eastern perimeter of the Site, Ridout Street North contains two through lanes of one-way traffic (southbound), a High Occupancy Vehicle (HOV) lane, turning lanes, dedicated bicycle lanes and sidewalks. Adjacent to the Site's southern perimeter, King Street accommodates one lane of through traffic in both directions, bicycle lanes and sidewalks.

Map 3 (Street Classifications) of The London Plan classifies Ridout Street North adjacent to the Site and King Street to the east of Ridout Street North as Rapid Transit Boulevards. Abutting the Site, King Street is classified as a Neighbourhood Street. Section 371 of The London Plan identifies that Rapid Transit Boulevards are to prioritize the through movement and connection to/of transit vehicles, move high volumes of traffic, provide a high-quality pedestrian realm and incorporate a high-standard of urban design. This Policy also sets out that Neighbourhood Streets are to: prioritize pedestrians; move low to medium volumes of traffic; minimize the width of the vehicle zone; provide a high-quality pedestrian realm; and integrate a high standard of urban design.

With respect to transit, the Site is located within convenient walking distance of London Transit bus stops in service along King Street, Ridout Street North, Queens Avenue, Richmond Street and York Street. Additionally, construction of the Downtown Loop of the BRT system is expected to be completed in the near-term. Map 3 identifies that the Downtown Loop is to include a transit station on King Street between Ridout Street North and Talbot Street, which is within convenient walking distance of the Site.

Figure 2 illustrates the Site, surrounding lands and the local development setting.

Figure 2: North-Facing Perspective View of Site (Outlined in Red)



(Source: Google Earth, December 2022).

2.3 Spatial Analyses

2.3.1 Regional Spatial Analysis

A Regional Analysis was conducted for the Site at a 400 and 800 m radius (refer to **Figure 3** of this Report).

The 400 m radius incorporates a large portion of the City's downtown core and includes a diverse range of land uses (e.g. offices, retail/service commercial enterprises, government, recreational, entertainment and cultural facilities, high density residential uses). Notably, Budweiser Gardens, Covent Garden Market, Museum London, Fanshawe College (Downtown Campus), Labatt Park, Ivey Park, Harris Park and several high-rise forms (office/residential) are located within this radius. This defined area also contains several London Transit stops, bike lanes and pathways associated with the Thames Valley Parkway.

A broader range of land uses are evident within the 800 m radius including additional downtown development, light industrial areas, schools, parkland and residential

neighbourhoods containing low and medium density residential forms. The number of accessible transit routes, bike lanes and pathways is also increased within this larger radius.

2.3.2 Local Analysis

A Local Analysis was conducted to understand the Site's relationship with the surrounding uses in the immediate area (refer to **Figure 4** of this Report). The key findings of the analysis are as summarized below:

- Active frontage zones have been identified along the street interfaces of the development (Ridout Street North and King Street). As part of the project design, appropriate pedestrian walkways, extensive glazing, enhanced façade treatments and weather protection would be provided in the vicinity of the adjacent frontages and plaza to enhance and activate the public interfaces;
- The property of 50 King Street currently interacts with the Middlesex County Court House and Gaol and parkland located to the immediate west (Ivey Park, Thames Valley Parkway) by way of pedestrian pathways, public spaces and shared parking fields;
- 399 Ridout Street North is designated under Part IV of the OHA, has a heritage easement and is a National Historic Site. The Site is also located within the Downtown Heritage Conservation District; and
- The Site is well served by transit and is within convenient walking distance of several London Transit routes operating along Ridout Street North, King Street, Queens Avenue, Dundas Street and Richmond Street. These lands are also within convenient walking distance of a transit station planned for the City's BRT system.

Sections 3.3 and 3.4 of this Report provides additional details on the design response to these interactions.

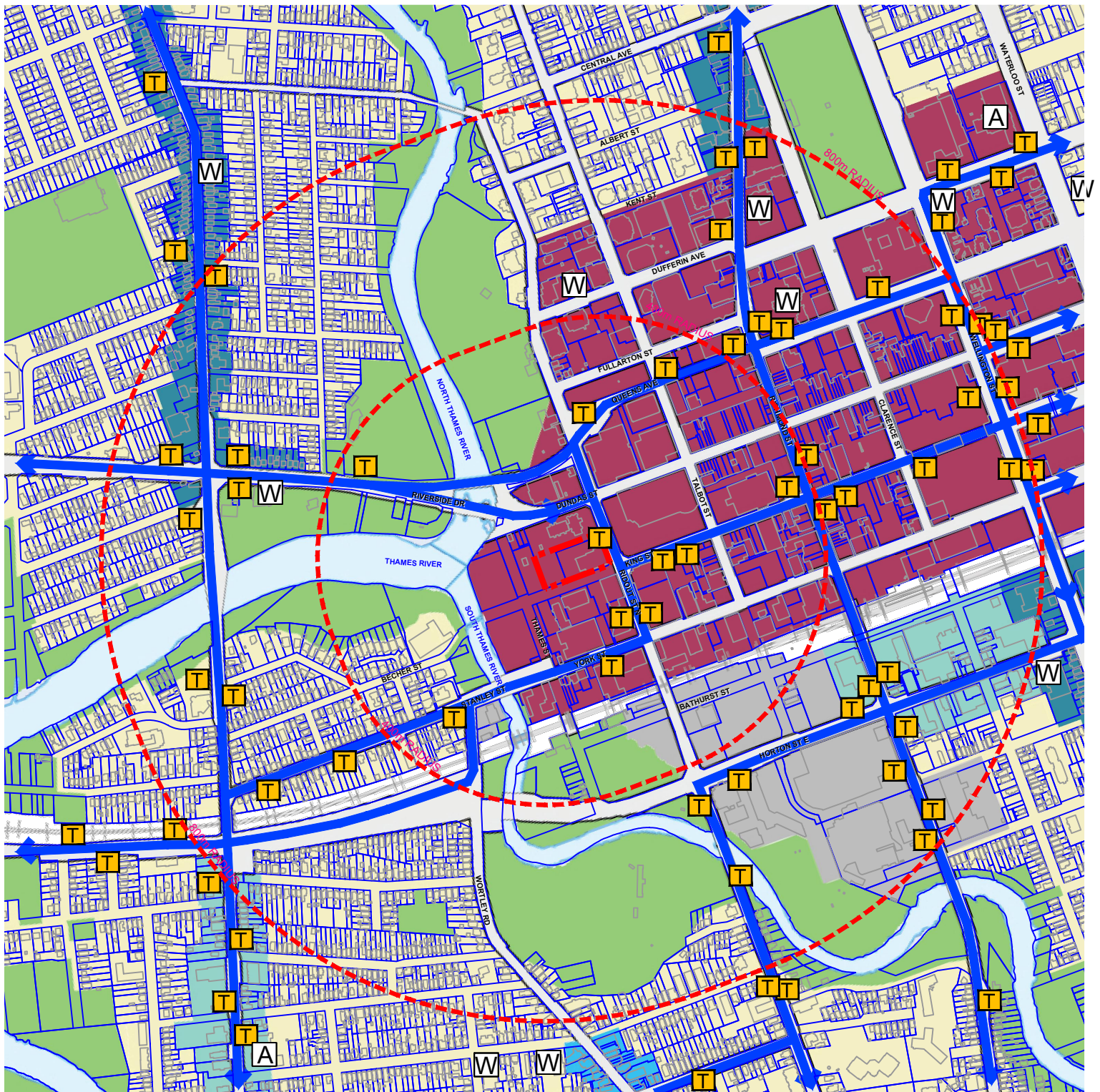


Figure 3
Regional Spatial
Analysis

50 King Street
City of London
Ontario

LEGEND

- | | | | |
|--|------------------------|--|------------------|
| | Subject Lands | | Public School |
| | Green Spaces | | Place of Worship |
| | Downtown | | Transit Route |
| | Rapid Transit Corridor | | Transit Stop |
| | Urban Corridor | | |
| | Main Street | | |
| | Neighbourhoods | | |
| | Light Industrial | | |

Source:
The London Plan Map 1, Place Types, City of London (c) 2022

DATE: February, 2023

SCALE: 1:10,000

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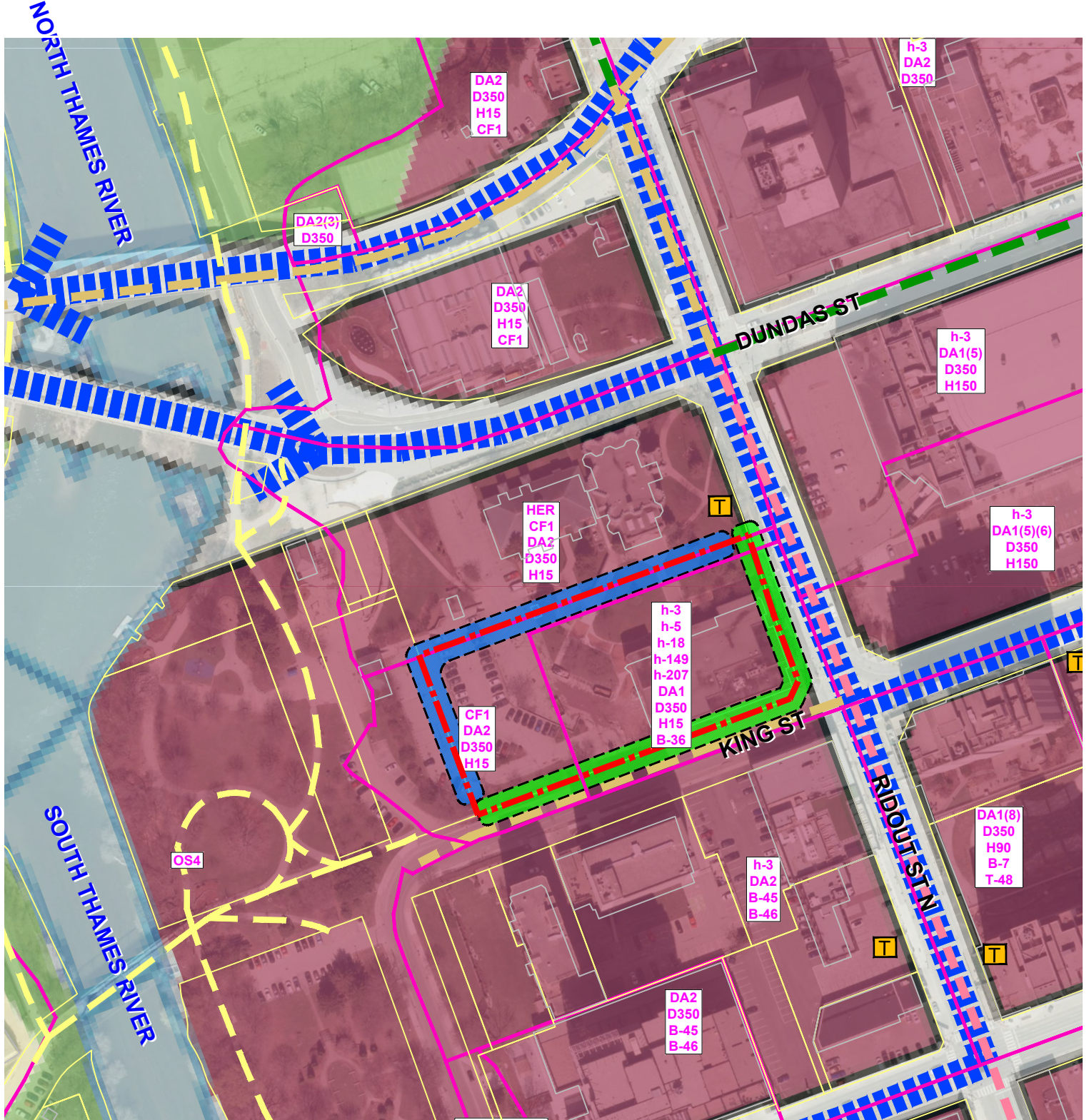


Figure 4
Location Spatial
Analysis

50 King Street
City of London
Ontario

LEGEND

	Subject Lands		Active Frontage Zone
	Green Spaces		Zone of Sensitivity
	Downtown		Transit Route
	Zone Limit		Transit Stop
DA	Downtown Area Zone		Signed Bike Lane
CF	Convenience Commercial Zone		Bike Lane
HER	Heritage Zone		Sharrow
h	Holding Provision		Thames Valley Parkway
H	Height Provision		
D	Density Provision		
B	Bonusing Provision		

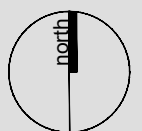
Source:
The London Plan Map 1, Place Types, City of London (c) 2022

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3.0 DESCRIPTION OF THE PROPOSAL

3.1 Design Goals and Objectives

50 King Street London Limited is proposing to amend the City's Official Plan and Zoning By-law to support the development of a landmark, mixed-use development on the Site. To facilitate the intended development, the three storey office building located at 50 King Street was demolished in 2022 and the existing surface parking is to be removed. The Middlesex County Court House and Gaol would not be altered in conjunction with the proposed development.

The following design objectives have been identified for the proposal:

1. Introduce an intensive, mixed-use (commercial/residential) building form within the subject lands: to function cohesively with the adjacent heritage building arrangement; to provide a design response compatible with the local development context; and to support the diversification and long-term vitality of downtown London;
2. Design a prominent high-rise form to establish further define the western gateway into the City's downtown core, and to accentuate the overall character and vitality of downtown London;
3. Create a positive addition to the Ridout Street North and King Street corridors by enhancing the visual qualities of the streetscapes, providing an engaging pedestrian environment and promoting a development compatible with existing and planned development in the area.
4. Redevelop the Site in a manner that will support existing transit services and transit investments, and will allow residents to walk to nearby shopping districts, entertainment venues, offices, public uses and parkland;
5. Incorporate enhanced indoor and outdoor amenity space for residents and improve pedestrian connectivity to local streets, adjacent parkland and nearby pathway systems;
6. Develop a vehicular access arrangement that supports efficient traffic movement; and
7. Apply design direction set out in The London Plan and applicable guideline documents,

where appropriate.

3.2 Concept Plan

Stantec Consulting Ltd. (Stantec) has prepared a conceptual site plan (concept plan) in support of the aforementioned design goals and objectives, and with consideration for the high-rise tower arrangement designed by Zedd Architecture and a conceptual landscape plan prepared by Ron Koudys Landscape Architects Inc. (RKLA).

The concept plan and the associated pedestrian/vehicular connectivity plan and main floor plan are presented in **Appendix A** of this Report. **Appendix B** provides several architectural perspective drawings of the tower arrangement, with conceptual tower elevations, cross-sectional drawings and street view elevations contained in **Appendix C**. Additionally, the conceptual landscape plan is included in **Appendix D** and **Appendix E** provides a shadow assessment of the building design prepared by Zedd Architecture.

The key components of the concept plan for the Site are as follows:

- Two high-rise towers, collectively containing 800 units configured as one, two and three bedroom apartments. Tower 1 would be positioned adjacent to the Ridout Street North/King Street intersection and would have a maximum height of 53 storeys. Tower 2 would be positioned adjacent to King Street, near the southern limit of the Site and would have a maximum height of 43 storeys. The main tower components have been designed to have viable floor area efficiency ratios, with typical floor plates of 1,000 m².
- A shared podium connecting the two towers that is predominately three storeys in height; transitioning to four storeys at the Tower 1 base. The podium would contain 2,865 m² retail space at grade, 10,920 m² of office space on levels two to four and lobby/amenity areas on the main floor. The podium floor plate measures 3,300 m² (ground level) with a cantilevered second storey for weather protection.
- Outdoor amenity space interspersed throughout the property including a plaza with landscaped areas and a lookout feature to the north of the building, and rooftop terraces (with pools) proposed for both towers. A variety of indoor amenity space would also be provided within the podium and tower components of the building.
- A structured parking facility located beneath the podium and plaza area, as well as a loading area internal to the podium. A total of 550 vehicle stalls would be accommodated in four parking levels.
- A vehicle entry court from Ridout Street North to drop-off/loading areas under the podium bridge (exiting to King Street). The structured parking facility would also be serviced by two accesses from King Street.

- An internal access arrangement integrating pedestrian connections to the street frontages, the Middlesex County Court House and Gaol and Ivey Park.

3.3 Design Considerations

The following discussion outlines several design elements integrated into the proposed redevelopment plan, which incorporates commentary provided by Zedd Architecture.

- **Building Form.** The proposed high-rise building would be positioned in close proximity to the Ridout Street North and King Street frontages, with the tower mass stepped back from the shared podium element: to help reinforce the urban building line and pedestrian realm along these corridors; to accentuate the streetscapes; and to transition building height from the street corner. The podium serves to contribute to the pedestrian-oriented environment of the downtown through the provision of a strong street edge, active uses at grade and the inclusion of a bridge component that allows for pedestrian access through the building mass. Furthermore, the second storey of the building has been cantilevered over the first storey to provide weather protection.

The height of the podium (three to four storeys) is generally comparable to the Middlesex County Court House and Gaol. The placement of the podium serves to maintain the public space surrounding this building and to maintain associated views of the historic structure. Additionally, the tower components (1) have been positioned towards the south of the podium to provide greater separation distance from this building and (2) have been designed to reduce shadowing onto adjacent properties.

The following images illustrate the existing and proposed relationship of the Site, with the Middlesex County Court House and Gaol in the foreground.

Figure 5: Dundas Street/Ridout Street North Intersection (View southwest towards Site)



(Source: MHBC, May 18, 2023)

Figure 6: Rendering of Proposed Development (View Southwest from Dundas Street/Ridout Street North Intersection)



(Source: Zedd Architecture)

- **Building Orientation.** The orientation of the towers and podium has been designed to enhance the prominence of the development from the Thames River corridor. Looking east into the Site from that activity area, there are transitions in height provided by the arrangement of the parking structure (built into the slope with the north and west elevations visible), the three to four storey podium and the 43 and 53 storey towers (respectively). Both towers are visible from this location given the east-west elongated form of Tower 2 and the north-south elongated form of Tower 1. Further, there is a spectrum of views of the Forks of the Thames from the building and plaza and an elevator/stair lookout has been provided for public use and attraction.

The following figure illustrates the conceptual view of the Site from the Forks of the Thames activity area.

Figure 7: Rendering of Proposed Development (View Southeast from Ivey Park)



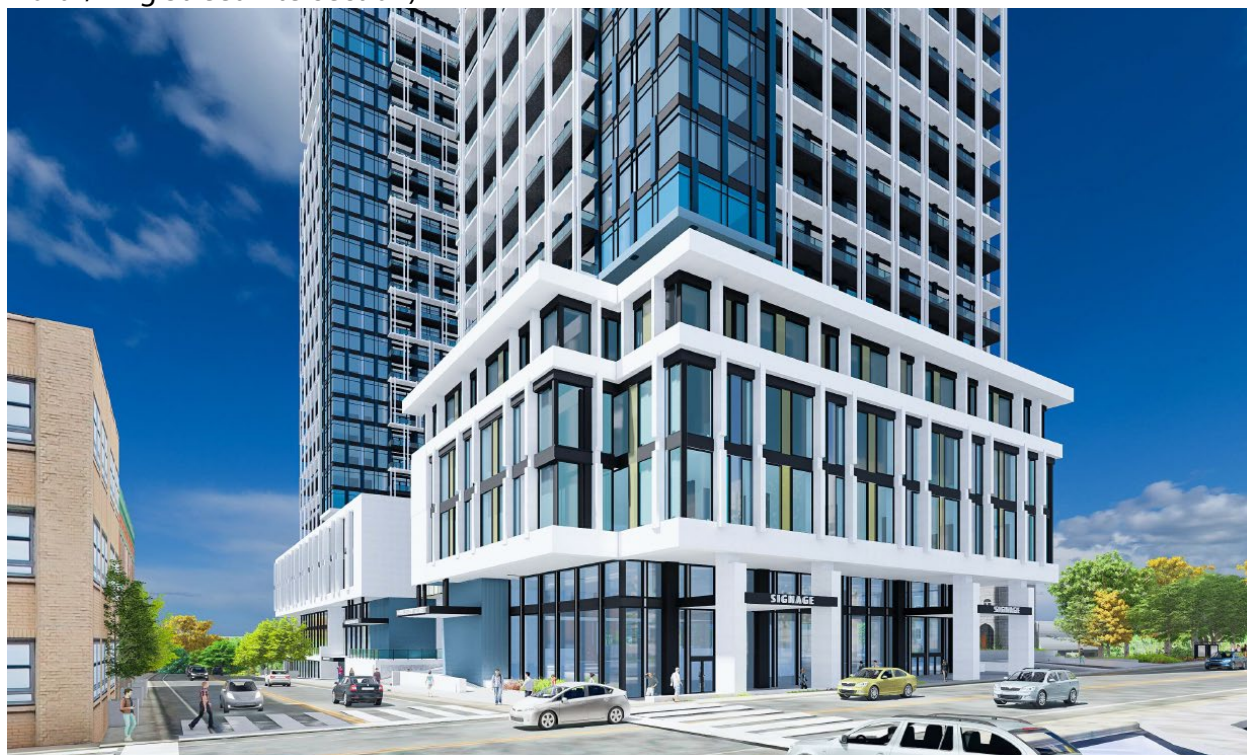
(Source: Zedd Architecture)

Tower 1, being the taller structure, is positioned towards the intersection of Ridout Street North and King Street to align with the higher density uses positioned to the east of the

Site in the downtown and to provide a landmark at this location. Tower 2 is positioned to the west to provide a step down towards the Thames River, and to follow the general topography of the Site which slopes towards the river channel. Active uses have been provided at-grade along both street frontages at the intersection to contribute to the public engagement with the Site and pedestrian-orientation of the development. Further, the orientation of Tower 1 is at a 90 degree angle to that of Tower 2, which reinforces the intersection and also reduces the potential for overlook.

The following figure illustrates the proposed building articulation at the intersection of Ridout Street North and King Street.

Figure 8: Rendering of Proposed Development (View Northwest from Ridout Street North/King Street Intersection)



(Source: Zedd Architecture)

- **Building Massing.** The massing of the proposed development is designed to create a comfortable and engaging pedestrian environment that is compatible with, and complementary to, the adjacent streetscapes and public spaces, the local development context and the broader downtown setting. Further, the building integrates three principal elements above-grade:
 1. **'Base' Element.** The base component of the building encompasses the structured parking facility which spans the majority of the subject lands. The parking structure has been built into the slope of the Site, has a publicly accessible plaza on top to the

north of the building and has partially visible north and west elevations (approximately one storey). The base element supports the use of the plaza by providing pedestrian access from Ridout Street North through the Site with pedestrian pathways, wheelchair ramps adjacent to stairs, and landscaping features. The single storey massing to the north and west generally aligns with the environment created by the existing retaining walls and provides glazing on the visible elevations to create an engaging pedestrian environment.

2. **Podium Element.** The podium component of the proposal generally encompasses the main building entrances, lobbies, retail space and office space. The retail space is provided at-grade to activate the pedestrian-level streetscapes and public realms (oriented towards Ridout Street North, King Street and the plaza). The upper storeys of the podium are cantilevered over the first storey to provide weather protection for the at-grade interface. The podium provides a pedestrian-oriented form and compliments the nearby development context (i.e., street wall, building scale).
 3. **Tower Elements.** Residential units are situated above the podium (office/commercial space) in Tower 1 (Levels 6 through 51, excluding level 33 for mechanical/amenity purposes) and Tower 2 (Levels 5 through 41, excluding Level 27 for mechanical/amenity purposes). Residential units incorporate individual balconies which provide shadowing into and across the building surface. The towers are also oriented perpendicular to one another to create visual interest and to minimize overlook. Further, the towers have been designed to be distinctive and to positively contribute to the downtown skyline. The rooftops of the towers integrate amenity space (including outdoor pools) and mechanical equipment.
- **Façade Treatment.** The tower design incorporates a consistent, contemporary façade style integrating extensive glazing and repetition of lines and windows (to help break up the continuous mass of the structure). Interruptions (cut-outs) in the balcony design are also proposed to provide unique design components within the towers and to further break up the building mass. Moreover, large windows and entrance features in the lower floors help to promote active street frontages and public spaces. **Appendix B** of this Report presents several renderings of the proposed development illustrating the aforementioned design treatments.
 - **Pedestrian Environment/Outdoor Amenity Space.** The office/commercial and residential elements of the proposed development are to be accessed by pedestrian entrances from the Ridout Street North sidewalk, the King Street sidewalk and the plaza to the north of the Site. Internal pathways with wheelchair ramps also provide accessible linkages to Ivey Park and the Thames Valley Parkway. The plaza space has been designed with consideration for Crime Prevention Through Environmental Design (CPTED) concepts such as natural surveillance (e.g. glazing towards the plaza, visibility from street). As illustrated in **Appendix D**, the landscaping concept for the development provides outdoor amenity space for building users and the general public.

3.4 Heritage Considerations

The Site is designated under Part V of the Ontario Heritage Act as a part of the Downtown (London) Heritage Conservation District. Additionally, 399 Ridout Street North is individually designated under Part IV of the Ontario Heritage Act, is subject to a heritage easement (Ontario Heritage Trust) and is a National Historic Site. MHBC has prepared a Heritage Impact Assessment (HIA), dated March 10, 2023, to evaluate the potential impact of the proposed development on (1) the overall Downtown London Heritage Conservation District and (2) the adjacent significant cultural heritage resources located at 399 Ridout Street North, London, including the Middlesex County Court House and Gaol.

Generally, MHBC concludes the following in Section 9 (Recommendations) of the HIA:

- The proposed development is consistent with the majority of the Downtown London Heritage Conservation District policies and guidelines. The assessment requires more information respecting proposed materials and sympathetic design articulations particular to the podium and landscape plan to more fully assess compliance; and
- The final design of the proposed development should be reviewed in the form of an Addendum to the HIA at the Site Plan Approval stage to ensure compatibility of the proposed development as it relates to the Heritage Conservation District and the adjacent cultural heritage resource (399 Ridout Street North).

4.0 PLANNING ANALYSIS

The Official Plan Amendment and Zoning By-Law Amendment applications identified in Table 1.0 of this Report must be assessed in terms of applicable policies set out by the Province of Ontario and the City of London. The following section outlines how the proposal addresses relevant policies from the Provincial Policy Statement and the City of London Official Plan (The London Plan).

4.1 Provincial Policy Statement

The current Provincial Policy Statement (PPS) was issued under Section 3 of the Planning Act and came into effect on May 1, 2020. The PPS provides overall policy direction on matters of provincial interest related to land use planning and development, and sets the policy foundation for regulating the development and use of land. Part IV of the PPS sets out that this policy instrument provides a vision for land use planning in Ontario that focuses growth within settlement areas, and encourages efficient development patterns to optimize the use of land, resources and public investment in infrastructure and public service facilities.

The proposed development plan has been evaluated with regard to the policy direction and provisions of the PPS. Based on this analysis, it is our opinion that specific policies in Section 1.0 (Building Strong Healthy Communities) and Section 2.0 (Wise Use and Management of Resources) are particularly relevant to this proposal. Table 3.0 demonstrates how the proposed development is consistent with the identified policies.

Table 3.0 – Consistency with Provincial Policies

PPS Policy	Response
1.1.1 Healthy, liveable and safe communities are sustained by: a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term; b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable	The development proposal promotes an efficient land use pattern that would support the long-term financial well-being of the Province of Ontario and the City of London (in the form of increased property tax assessment and the optimization of existing infrastructure). Further, the residential population, employees and patrons of this development would help to support the overall viability of the City's downtown. Economic benefits would also

PPS Policy	Response
<p>housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;</p> <p>c) avoiding development and land use patterns which may cause environmental or public health and safety concerns;</p> <p>d) avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas which are adjacent or close to settlement areas;</p> <p>e) promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs;</p> <p>f) improving accessibility for persons with disabilities and older persons by addressing land use barriers which restrict their full participation in society;</p> <p>g) ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;</p> <p>i) preparing for the regional and local impacts of a changing climate.</p>	<p>be derived from construction of the building.</p> <p>The Site is located within the Central London planning area, which functions as the City's primary business, office, cultural and administrative centre. Development of a mixed-use, high-rise building on the Site aligns with City of London objectives to encourage a broad range of residential and employment opportunities in downtown London. Further, the core area contains a diverse mix of intensive uses, including office towers and apartment buildings. This development proposal is designed to be compatible with these intensive land uses and appropriate for the existing development context.</p> <p>The proposed development should not result in environmental or public health and safety concerns.</p> <p>The intensity of this project represents an efficient use of subject lands situated in downtown London and within a designated Protected Major Transit Station Area. The Site is also located within convenient walking distance of services and amenities in the downtown to help accommodate the needs of residents and employees of the planned development.</p> <p>The proposal would implement accessible design and would accommodate active modes of transportation through the provision of pedestrian paths as well as bicycle storage areas.</p> <p>Preliminary servicing reviews completed by Stantec confirm that (1) the development can proceed in a cost-effective manner and (2) the necessary servicing infrastructure would be available to meet projected needs. Study findings are documented in the</p>

PPS Policy	Response
	<p>associated Preliminary Water Servicing Brief, dated September 9, 2022, Preliminary (Sanitary) Servicing Brief, dated November 6, 2022, and the Storm Water Management Plan, dated February 28, 2023. It is also anticipated that existing public service facilities available in Central London would accommodate demand generated from this development.</p>
<p>1.1.2 Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of up to 25 years, informed by provincial guidelines. However, where an alternate time period has been established for specific areas of the Province as a result of a provincial planning exercise or a provincial plan, that time frame may be used for municipalities within the area.</p> <p>Within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas.</p>	<p>The development of the Site represents an intensification of lands within downtown London that are intended for a wide variety of land uses (including high-rise building forms). This proposal would accommodate a mix of high density residential and office/commercial uses which, collectively, would contribute to the planned function of the downtown (i.e., the City's highest-order mixed-use centre).</p> <p>This proposal would introduce intensive development on the Site to support the overall vitality of the downtown core and, more broadly, the Central London planning district. Moreover, implementation of this proposal would help the City accommodate its forecasted population growth and achieve its projected housing requirements as set out in The London Plan.</p>
<p>1.1.3.1 Settlement areas shall be the focus of growth and development.</p>	<p>The subject lands are situated within the City's Urban Growth Boundary (UGB) and are therefore considered part of a settlement area, as defined by the PPS.</p>
<p>1.1.3.2 Land use patterns within settlement areas shall be based on densities and a mix of land uses which:</p> <ul style="list-style-type: none"> a) efficiently use land and resources; b) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or 	<p>This project would promote the efficient use of land and services in downtown London. As outlined in this Report, preliminary servicing reviews have been completed to confirm that adequate servicing capacity is available to accommodate the intended development.</p>

PPS Policy	Response
<p>available, and avoid the need for their unjustified and/or uneconomical expansion;</p> <p>c) minimize negative impacts to air quality and climate change, and promote energy efficiency;</p> <p>d) prepare for the impacts of a changing climate;</p> <p>e) support active transportation;</p> <p>f) are transit-supportive, where transit is planned, exists or may be developed;</p> <p>Land use patterns within settlement areas shall also be based on a range of uses and opportunities for intensification and redevelopment in accordance with the criteria in policy 1.1.3.3, where this can be accommodated.</p>	<p>Where practical and appropriate, the project would incorporate sustainable development principles to help minimize environmental impacts.</p> <p>The site layout promotes active transportation through the provision of pedestrian connections to King Street, Ridout Street North, Ivey Park and the Thames Valley Parkway. Bicycle storage space is also planned within the structured parking facility.</p> <p>The subject lands are located within convenient walking distance of London Transit bus stops serving the downtown core and providing transit connectivity to employment areas, major public institutions shopping centres and recreational facilities. Proximate to the Site, BRT stations are also planned to the west of Talbot Street on Queens Avenue and King Street.</p>
<p>1.1.3.3 Planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.</p>	<p>The project would establish a prominent, intensive high-rise form located within convenient walking distance of transit services (existing and planned). In this respect, the redevelopment plan would accommodate 800 apartment units configured for a range of one, two and three bedroom units, as well as 13,785 m² of retail/office space (equating to a density of 1,172 units/ha with equivalent non-residential units). Servicing reviews have also been conducted to confirm that existing infrastructure can accommodate the proposal.</p>
<p>1.1.3.4 Appropriate development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or</p>	<p>The proposal promotes the efficient redevelopment of an underutilized site in downtown London on lands designated for a mix of uses.</p>

PPS Policy	Response
mitigating risks to public health and safety.	
<p>1.3.1 Planning authorities shall promote economic development and competitiveness by:</p> <ul style="list-style-type: none"> a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs; b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses; d) encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities, with consideration of housing policy 1.4. 	<p>The proposal integrates a compact mix of office/commercial and residential space that is appropriate for the downtown London context and is intended to support its planned function. In effect, the intensity and design of this development would contribute to the revitalization and overall vibrancy of the downtown core while also responding to market demand.</p>
<p>1.4.3 Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:</p> <ul style="list-style-type: none"> b) permitting and facilitating: <ul style="list-style-type: none"> 1. all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising 	<p>Collectively, the 800 apartment units planned in conjunction with the proposed high-rise towers would broaden the range and mix of housing available to current and future residents of Central London. Additionally, this project would help the City accommodate forecasted population growth, address projected housing requirements and advance downtown revitalization initiatives.</p> <p>Preliminary servicing reviews have been conducted by Stantec to confirm that servicing infrastructure is available to meet projected needs. Additionally, it is anticipated that existing public service facilities available in Central London would</p>

PPS Policy	Response
<p>from demographic changes and employment opportunities; and</p> <p>2. all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3;</p> <p>c) directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;</p> <p>d) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;</p> <p>e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations;</p>	<p>accommodate the projected demands of this development.</p> <p>This mixed-use project would (1) utilize existing land and servicing resources in an efficient manner and (2) would be supported by the road transportation system, the active transportation network and transit services. The intensity of the project also contributes to the optimization of investment in transit infrastructure, notably the BRT Downtown Loop, which includes a rapid transit station planned along the King Street corridor within convenient walking distance of the Site.</p>
<p>1.5.1 Healthy, active communities should be promoted by:</p> <p>a) planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate active transportation and community connectivity;</p>	<p>The proposal incorporates two key elements to help support healthy, active communities. Firstly, active transportation and social interaction would be encouraged by the provision of accessible pedestrian pathway connections to municipal sidewalks, outdoor amenity areas for passive recreation, as well as bicycle storage in the building. Secondly, to promote community connectivity, this project integrates residential development and employment activities in proximity to existing neighbourhoods, businesses, offices, cultural and administrative activities,</p>

PPS Policy	Response
	parks, public transit and the City's active mobility network.
<p>1.6.1 Infrastructure and public service facilities shall be provided in an efficient manner that prepares for the impacts of a changing climate while accommodating projected needs. Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they are:</p> <ul style="list-style-type: none"> a) financially viable over their life cycle, which may be demonstrated through asset management planning; and b) available to meet current and projected needs. 	<p>Preliminary servicing reviews have been carried out to confirm that the development can proceed in a cost-effective manner and to ensure that the necessary infrastructure is available to meet projected needs. It is also anticipated that existing public service facilities available in Central London would accommodate the projected demands of this development.</p>
<p>1.6.7.2 Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.</p> <p>1.6.7.3 As part of a multimodal transportation system, connectivity within and among transportation systems and modes should be maintained and, where possible, improved including connections which cross jurisdictional standards.</p> <p>1.6.7.4 A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.</p>	<p>Paradigm Transportation Solutions Limited (Paradigm) completed a Transportation Impact Assessment (TIA) for the proposal. Generally, Paradigm concludes in the associated study report, dated May 2023, that the existing road network can accommodate the proposed development provided recommended remedial measures are implemented (including several recommendations for transportation demand management measures).</p> <p>The Site is located within convenient walking distance of existing London Transit services, with bus routes operating along the Dundas Street, King Street and Ridout Street North corridors. The LTC transfer system provides connectivity throughout the City and to regional transportation facilities (e.g., London International Airport, VIA Rail Station). The introduction of an intensive mixed-use development on the Site would help to support existing and</p>

PPS Policy	Response
	<p>future investments in public transit (including the BRT system).</p> <p>The proximity of the Site to established service/retail commercial uses, offices, cultural and entertainment facilities, institutional uses and parks would help future residents, employees and patrons minimize the length and frequency of vehicle trips. Convenient access to the City's sidewalk and trail networks would also encourage active transportation.</p>
<p>1.7.1 Long-term economic prosperity should be supported by:</p> <p>a) promoting opportunities for economic development and community investment-readiness;</p> <p>b) encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce;</p> <p>c) optimizing the long-term availability and use of land, resources, infrastructure and public service facilities;</p> <p>d) maintaining and, where possible, enhancing the vitality and viability of downtowns and mainstreets;</p> <p>e) encouraging a sense of place, by promoting well-designed built form and cultural planning, and by conserving features that help define character, including built heritage resources and cultural heritage landscapes;</p>	<p>This redevelopment proposal has been designed to optimize the use of the subject lands for a mix of commercial activities and market-based residential units. The Site benefits from its proximity to the City's higher-order road network, transit services and public facilities. It is expected that the residents and patrons of the proposed development would support these services and facilities. It is also anticipated that residents and employees of the planned development would utilize services and facilities in downtown London; supporting efforts to revitalize the core area and contributing to its planned function as the City's highest-order, mixed use centre.</p>
<p>1.8.1 Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and preparing for the impacts of a changing climate</p>	<p>As discussed, the project supports the intensive use of lands designated for a mix of uses that are situated within a downtown context and connected via active transportation and public transit to</p>

PPS Policy	Response
<p>through land use and development patterns which:</p> <ul style="list-style-type: none"> a) promote compact form and a structure of nodes and corridors; b) promote the use of active transportation and transit in and between residential, employment (including commercial and industrial) and institutional uses and other areas; e) encourage transit-supportive development and intensification to improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion; 	<p>shopping, employment areas, cultural and entertainment facilities, educational institutions, residential neighbourhoods, and parkland. Development of the proposed mixed-use, high-rise building would contribute to a diversified range of residential and employment opportunities within downtown London. Further, this project would help to support increased transit ridership and investments in the City's BRT system.</p> <p>The introduction of high density residential and office/commercial uses on the subject lands would (1) increase housing choice and employment opportunities in the downtown and (2) promote an intensive development within close proximity to the above-noted mix of land uses. In light of this, it is expected that the project would shorten commuting requirements for residents and employees (thereby decreasing transportation congestion).</p>
<p>2.1.1 Natural features and areas shall be protected for the long term.</p>	<p>The subject lands do not contain any known natural features.</p>
<p>2.4.1 Minerals and petroleum resources shall be protected for long-term use.</p>	<p>The subject lands do not contain any known mineral or petroleum resources.</p>
<p>2.5.1 Mineral aggregate resources shall be protected for long-term use and, where provincial information is available, deposits of mineral aggregate resources shall be identified.</p>	<p>The subject lands do not contain any known mineral aggregate resources.</p>
<p>2.6.1 Significant built heritage resources and significant cultural heritage landscapes shall be conserved.</p>	<p>As discussed in Section 3.4 of this Report, MHBC has prepared an HIA to evaluate the potential impact of (1) the overall Downtown London Heritage Conservation District and (2) the adjacent significant cultural heritage resources located at 399 Ridout Street North, London, including the Middlesex County Court House and Gaol.</p>

PPS Policy	Response
	Generally, MHBC sets out a series of recommendations in the HIA for consideration as project planning advances to the Site Plan Approval stage to ensure compatibility of the proposed development as it relates to the Heritage Conservation District and the adjacent cultural heritage resource (399 Ridout Street North).
2.6.2 Development and site alteration shall not be permitted on lands containing archaeological resources or areas of archaeological potential unless significant archaeological resources have been conserved.	A Stage 1-2 Archaeological Assessment of the Site was conducted by Lincoln Environmental Consulting Corp (LECC). LECC concludes in the associated study report, dated March 2023, that no archaeological resources were found on the study property and no further archaeological assessment of the property is required.
2.6.3 Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property except where the proposed development and site alteration has been evaluated and it has been demonstrated that the heritage attributes of the protected heritage property will be conserved.	The HIA assessed the potential impacts to the adjacent resources and recommends mitigation measures to assist with the protection of heritage attributes.

The 2020 Provincial Policy Statement seeks to achieve healthy, livable and safe communities by promoting efficient development and land use patterns. **Given the foregoing assessment, in our opinion the proposed redevelopment plan is consistent with the policies of the PPS.** In this regard, the intended use of the Site:

- Represents a compact, mixed-use building form that would intensify lands situated within the City's downtown core and located in the vicinity of prominent offices, retail/service commercial enterprises, government activities, recreational, entertainment and cultural facilities, high-rise buildings and parkland;
- Introduces an intensive residential type that: has regard for the established character of the surrounding area, has consideration for adjacent protected heritage properties, is compatible with the existing development context, provides an accessible pedestrian

orientation, encourages active transportation, and is in proximity of the City's higher-order road network, transit services and municipal pathways;

- Proposes 800 apartment units to broaden the range and mix of housing available to current and future residents of Central London, and to help the City accommodate forecasted housing demands and achieve intensification targets;
- Integrates a mix of higher density residential and office/commercial uses, which collectively support efforts to revitalize the downtown core and contribute to its planned function as the City's highest-order, mixed use centre;
- Promotes a scale of residential development that would (1) optimize municipal investments in servicing infrastructure and public transit, (2) support the long-term viability of various non-residential activities in proximity to the Site, and (3) generate substantial tax revenues to benefit the financial well-being of the Province and the City; and
- Would not involve development on lands having known significant environmental, archaeological, mineral aggregate or petroleum resources.

4.2 City of London Official Plan (The London Plan)

4.2.1 Status

Policy 4.6 of the PPS states that Official Plans are the most important vehicle for implementation of the PPS. It is further stated that Official Plans are to identify provincial interests and set out appropriate land use designations and policies. Accordingly, this proposal has been assessed relative to the applicable policies of the City of London Official Plan.

The City of London Council adopted a new Official Plan on June 23, 2016 and the Ministry of Municipal Affairs (MMA) issued its approval of The London Plan, with modifications, on December 30, 2016. Several policies and schedules of this Official Plan applicable to the Site were appealed, and were subject to adjudication by the Ontario Land Tribunal and its predecessors (Case No. OLT-22-002286). The Tribunal, in its Decision issued May 25, 2022, resolved the final phase of the general policy appeals and ordered The London Plan to be fully in-force (excluding outstanding site-specific appeals).

4.2.2 Place Type

Figure 9 of this Report illustrates that the Site is within the Downtown place type pursuant to Map 1 (Place Types) of The London Plan. Additionally, Map 10 (Protected Major Transit Station Areas) identifies that the Site is located within the Downtown Protected Major Transit Station

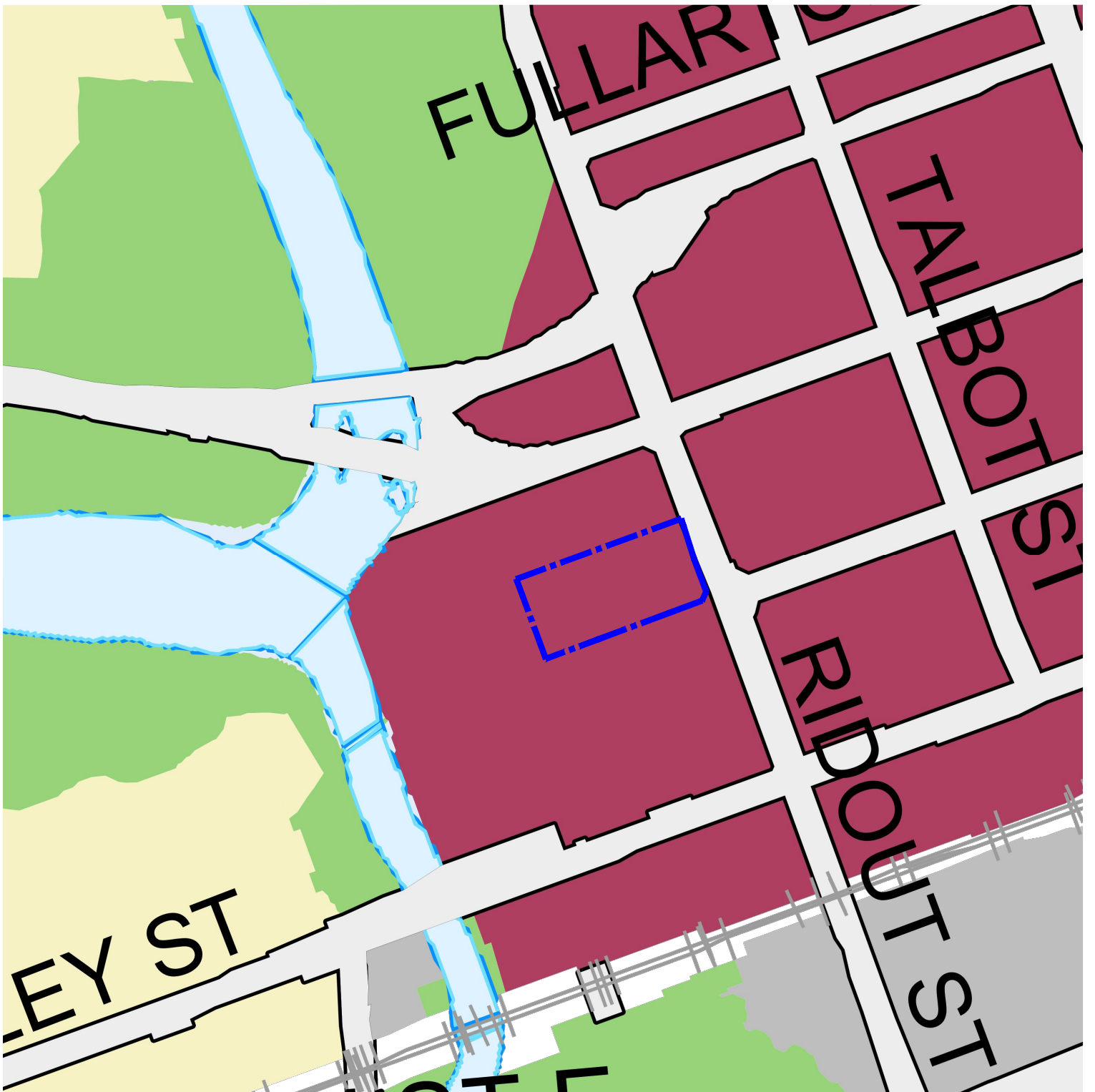


Figure 9
City of London
The London Plan:
Map 1 - Place Types

LEGEND

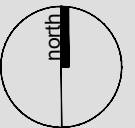
- Subject Lands
- Green Spaces
- Downtown
- Neighbourhoods
- Light Industrial

DATE: February, 2023

SCALE: 1:4,000

FILE: 1094BC

DRAWN: PL



K:\1094BC-50 KING ST LONDON\REPORT\FIGURES.DWG

50 King Street
City of London
Ontario

Source:
The London Plan Map 1, Place Types, City of London (c) 2022

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Area. Figures 2, 3 and 4 of the Official Plan also illustrate that the Site is located within the City's Built-Area Boundary, Primary Transit Area and Central London, respectively.

4.2.3 Policy Overview

Considering this land use framework and the scope of the proposal, it is our opinion that the Our Strategy, Our City, City Building, Place Type and Our Tools parts of The London Plan contain policies applicable to project.

The following discussion (1) summarizes, in our opinion, the core policies of The London Plan respecting this proposal and (2) evaluates the merits of this project relative to this policy framework.

4.2.4 Our Strategy

The Our Strategy part of The London Plan contains a series of policies that address the core values, vision and key directions of the Plan to help guide planning and city building activities. The core values of this Official Plan are set out in Policy 52, and include a number of themes relating to development proposals (e.g., be collaborative, be innovative, think sustainable). Further, Policy 53 defines the vision for The London Plan to provide a focus for planning decisions: "London 2035: Exciting, Exceptional, Connected".

Policies 54 to 63 define eight key directions to help achieve this broad vision and to guide planning development to the year 2035 (being The London Plan's 20-year planning horizon). In our opinion, the following key directions and associated planning strategies have particular relevance to this proposal:

"55_ Direction #1 Plan strategically for a prosperous city

1. Plan for and promote strong and consistent growth and a vibrant business environment that offers a wide range of economic opportunities.
4. Revitalize our urban neighbourhoods and business areas.
11. Plan for cost-efficient growth patterns that use our financial resources wisely.

59_ Direction #5 Build a mixed-use compact city

1. Implement a city structure plan that focuses high-intensity, mixed-use development to strategic locations - along rapid transit corridors and within the Primary Transit Area.
2. Plan to achieve a compact, contiguous pattern of growth – looking "inward and upward".

3. Sustain, enhance, and revitalize our downtown, main streets, and urban neighbourhoods.
4. Plan for infill and intensification of various types and forms to take advantage of existing services and facilities and to reduce our need to grow outward.
5. Ensure a mix of housing types within our neighbourhoods so that they are complete and support aging in place.

60_ Direction #6 Place a new emphasis on creating attractive mobility choices

5. Focus intense, mixed-use development to centres that will support and be served by rapid transit integrated with walking and cycling.
6. Dependent upon context, require, promote, and encourage transit-oriented development forms.

61_ Direction #7 Build strong, healthy and attractive neighbourhoods for everyone

1. Plan for healthy neighbourhoods that promote active living, provide healthy housing options, offer social connectedness, afford safe environments, and supply well distributed health services.
2. Design complete neighbourhoods by meeting the needs of people of all ages, incomes and abilities, allowing for aging in place and accessibility to amenities, facilities and services.
3. Implement “placemaking” by promoting neighbourhood design that creates safe, diverse, walkable, healthy, and connected communities, creating a sense of place and character.

62_ Direction #8 Make wise planning decisions

1. Ensure that all planning decisions and municipal projects conform to The London Plan and are consistent with the Provincial Policy Statement.
2. Plan for sustainability – balance economic, environmental, and social considerations in all planning decisions.
4. Plan so that London is resilient and adaptable to change over time.
8. Avoid current and future land use conflicts – mitigate conflicts where they cannot be avoided.
9. Ensure new development is a good fit within the context of an existing neighbourhood.”

It is our opinion that the proposed high-rise tower arrangement supports the key directions set out in the referenced policies, as this development plan:

- Promotes intensive, compact design that efficiently utilizes servicing infrastructure to accommodate projected needs and supports existing transit service and future transit investments;
- Intensifies the use of the subject lands in a manner that supports the diversification and long-term vitality of the downtown and promotes a walkable and connected community;
- Introduces prominent tower forms (1) to support the inward and upward development pattern encouraged by The London Plan and (2) contribute to a distinctive community character; and
- Incorporates a land use pattern that: is in keeping with Provincial and City planning policies; is compatible with the existing development context pattern; and is not anticipated to generate adverse land use impacts.

Respecting the project being a good fit for the neighbourhood character, several design elements are incorporated into the development concept to promote compatibility with these surrounding uses, including:

- Positioning the buildings towards King Street and Ridout Street North to promote a pedestrian orientation and to maintain and extend the existing street wall along these corridors;
- Utilizing podium elements along King Street, Ridout Street North and the plaza internal to the block to (1) respect surrounding low-rise building forms by providing a height transition and (2) to enhance the pedestrian environment at the street level; and
- Integrating a consistent, contemporary façade style emphasizing a pedestrian scale at the street level and extensive glazing, terracing and colour/material variations to break up the continuous mass of the structures. As discussed in Section 3.3 of this Report, interruptions (cut-outs) in the balcony design are also proposed to provide unique design components within the towers and to further break up the building mass.

4.2.5 Our City

4.2.5.1 Overview

The Our City part of The London Plan contains policies and schedules relating to the City Structure Plan that have particular relevance to this project.

Policy 69 of this Official Plan states that the City Structure Plan establishes a framework for London's growth for the 20-year planning horizon and informs other policies of the Plan.

Policy 70 further prescribes that, “All of the planning we do will be in conformity with the City Structure Plan ... Planning and development applications will only be approved if they conform to the City Structure Plan.”

Policy 69 also identifies that the City Structure Plan is set out in five associated frameworks: growth, green, mobility, economic, and community. Policies 71 to 146 provide policy direction relating to each of these frameworks. Within this policy structure, it is identified that the subject lands are located within:

- The Urban Growth Boundary (Figure 1 of The London Plan);
- The Built-Area Boundary (Figure 2);
- The Primary Transit Area (Figure 3);
- Central London (Figure 4); and
- The Downtown place type (Figure 5).

In our opinion, the proposed mixed-use, high-rise development plan has regard for applicable policies and schedules relating to the five frameworks of the City Structure Plan. Most notably, it is our opinion that the plan addresses the intensification objectives of the Built-Area Boundary, Primary Transit Area and Central London planning district.

4.2.5.2 City Structure Policy Review

In relation to the specific policy direction for the Built-Area Boundary and the Primary Transit Area, The London Plan sets out the following objectives pursuant to Policies 90 and 91:

“90_The Primary Transit Area will be a focus of residential intensification and transit investment within London. It includes the Transit Villages and the Rapid Transit Corridors. The nature and scale of intensification will vary depending on the Place Type within the Primary Transit Area and will be a good fit within existing neighbourhoods. The Primary Transit Area will also have a heightened level of pedestrian and cycling infrastructure to service and support active mobility and strong connections within these urban neighbourhoods.

91_Directing infill and intensification to this area is a major part of this Plan’s strategy to manage growth in the city as a whole and to target 45% of all future residential growth in the Built-Area Boundary.” [emphasis added]

Further, Policy 92 incorporates the following associated provisions that, in our opinion, have relevance to this proposal:

“3. To promote intensification in the Primary Transit Area, it is an objective of this Plan that 75% of the intensification target will be in the Primary Transit Area.

5. The City Design Policies will be applied in the review of municipal projects and planning and development applications to enhance and protect residential amenity in the Primary Transit Area.
6. Municipal servicing within the Primary Transit Area will be planned to recognize the greater population density and heightened demand for services in this area and also recognizing the heightened demand for active mobility.
7. Municipal urban regeneration initiatives will be focused on neighbourhoods and business areas within the Primary Transit Area ...
8. Development within the Primary Transit Area should be designed to be transit-oriented and well serviced by cycling lanes and paths, sidewalks, urban public spaces, and public seating areas."

It is our opinion that the proposed development supports the policy direction of the Built-Area Boundary and the Primary Transit Area, as the project would:

- Direct intensification to an appropriate place type and to a location that can accommodate the intended use and is serviced by the City's higher-order road network, transit and active transportation systems;
- Employ a high standard of urban design;
- Incorporate a mix of high density residential and commercial uses to support the diversification, intensification and overall vitality of the downtown; and
- Provide a transit-oriented development within convenient walking distance of public transit provided along Ridout Street North, King Street and Dundas Street, and a future BRT station. The Site is also well serviced by sidewalks and cycling lanes.

In our opinion, the following policies pertaining to Central London (Policy 94) also have relevance to this proposal:

- "1. Infill and intensification will be facilitated, promoted, and serviced within Central London subject to the policies of this Plan.
2. Where appropriate, greater heights and densities may be permitted within Central London than in other neighbourhoods subject to the Place Type policies of this Plan."

The proposed development responds to these Central London policies by providing for the redevelopment of the subject lands for an intensive tower development that, in our opinion, is appropriate for the subject lands and in keeping with the downtown development context.

4.2.5.3 Growth Servicing Policies

Our City policies detail the City's strategy for growth servicing and financing (Policies 166 to 183). The principal objective of these policies is described in Policy 166: "The city's structure could not operate successfully without sustainable, secure, reliable, and affordable infrastructure". Further, Policy 168 states that municipal services will be planned on a long-term basis to support the City Structure Plan.

In our opinion, the following policies of this Official Plan section have particular relevance to this proposal:

"172_ The City shall be satisfied that adequate municipal infrastructure services can be supplied prior to any development or intensification proceeding

173_ Planning and development approvals will be discouraged where planned servicing capacity to accommodate the proposed use is not expected to become available within a five year time frame.

174_ Changes in place type and zoning that would result in the underutilization of previously planned and constructed municipal infrastructure will be discouraged."

As identified in Table 3.0 of this Report, preliminary servicing reviews have been completed by Stantec to confirm that (1) the development can proceed in a cost-effective manner and (2) the necessary servicing infrastructure would be available to meet projected needs. Study findings are presented in the Preliminary Water Servicing Brief, Preliminary (Sanitary) Servicing Brief; and Storm Water Management Plan prepared by Stantec in support of the OPA and ZBA applications.

4.2.5.3 Downtown, Transit Villages and Rapid Transit Corridor

The Our City part also provides City Structure Plan policies pertaining to the Downtown, Transit Villages and Rapid Transit Corridor place types, which are generally delineated on Figure 5 of this Official Plan and include the Site. Policy 95 acknowledges that while relative to the four Transit Villages, the Downtown is unique and allows for the greatest intensity and broadest range of uses, collectively these centres are to allow for intense, mixed-use neighbourhoods and business areas. It is further stated in this Policy that the activities associated with these centres will help to make rapid transit viable in London. Additionally, Policy 97A identifies that all three place types are identified as Protected Major Transit Station Areas due to their proximity to rapid transit stations.

Policy 98 provides planning direction for the Downtown place type in the context of these rapid transit-oriented place types:

"98_ In conformity with the City Structure Plan the following actions will be taken:

1. Establish a world-class, mid-sized Downtown that is well connected to the rest of London, the surrounding region, and the airport and highways which connect London to the world.
4. Plan for a high level of residential amenity and public service within the Downtown, Transit Villages and Rapid Transit Corridors.
6. Plan and budget for infrastructure improvements necessary to accommodate planned growth within these centres and corridors.

In our opinion, the proposal is supportive of the aforementioned policies, as this project:

- Introduces high density residential types to facilitate both intensive development within downtown London and a greater mix of uses within the Site;
- Employs a high standard of urban design and connectivity (1) to contribute positively to the Downtown place type and (2) to support pedestrian, cycling and transit facilities of this area; and
- Incorporates an efficient development pattern to help optimize existing infrastructure servicing the Site and investments in municipal road and servicing infrastructure within the downtown core (including BRT facilities).

Given these considerations, in our opinion, this proposal confirms to the City Structure Plan defined within The London Plan.

4.2.6 City Design

With respect to the City Design component of The London Plan referenced above, Policies 189 to 306 of The London Plan define the urban design principles and policies that are intended to guide the character and form of development.

The overarching objectives of these policies are outlined in Policy 193:

“In all of the planning and development we do and the initiatives we take as a municipality, we will design for and foster:

1. A well-designed built form throughout the city.
2. Development that is designed to be a good fit and compatible within its context.
3. A high-quality, distinctive and memorable city image.
4. Development that supports a positive pedestrian environment.
5. A built form that is supportive of all types of active mobility and universal accessibility.

6. High-quality public spaces that are safe, accessible, attractive and vibrant.
7. A mix of housing types to support ageing in place and affordability.
8. Sustainably designed development that is resilient to long-term change.
9. Healthy, diverse and vibrant neighbourhoods that promote a sense of place and character."

In our opinion, the project description, concept plan and renderings included in this Report demonstrate that the development proposal has been designed to achieve these broad objectives, where applicable. Further, it is our opinion that the project design aligns with the intent of the character, streetscape, public space, site layout and building form policies set out in the City Design chapter. In this regard, germane to this proposal are design policies related to character, placemaking and high-rise buildings, including the following:

- "197_ The built form will be designed to have a sense of place and character consistent with the planned vision of the place type, by using such things as topography, street patterns, lotting patterns, streetscapes, public spaces, landscapes, site layout, buildings, materials and cultural heritage.
- 199_ All planning and development proposals within existing and new neighbourhoods will be required to articulate the neighbourhood's character and demonstrate how the proposal has been designed to fit within that context. ...
- 221_ The design of streetscapes will support the planned vision for the place type and will contribute to character and sense of place...
- 242_ Public spaces will be designed to support the planned vision of the place type by enhancing views and vistas, providing places to meet and gather, and establishing connections.
- 252_ The site layout of new development should be designed to respond to its context and the existing and planned character of the surrounding area.
- 253_ Site layout should be designed to minimize and mitigate impacts on adjacent properties.
- 256_ Buildings should be sited so that they maintain and reinforce the prevailing street wall or street line of existing buildings.
- 268_ Sites shall be designed to provide a direct, comfortable and safe connection from the principal building entrance to the public sidewalk.
- 270_ The location, configuration, and size of parking areas will be designed to support the planned vision of the place type and enhance the experience of pedestrians, transit-users, cyclists, and drivers.

289_ High and mid-rise buildings should be designed to express three defined components: a base, middle, and top. Alternative design solutions that address the following intentions may be permitted.

1. The base should establish a human-scale façade with active frontages including, where appropriate, windows with transparent glass, forecourts, patios, awnings, lighting, and the use of materials that reinforce a human scale.
2. The middle should be visually cohesive with, but distinct from, the base and top.
3. The top should provide a finishing treatment, such as a roof or a cornice treatment, to hide and integrate mechanical penthouses into the overall building design.

292_ High-rise buildings will incorporate a podium at the building base, or other design solutions to reduce the apparent height and mass of the building on the pedestrian environment, allow sunlight to penetrate into the right-of-way, and reduce the wind impacts.

293_ High-rise buildings should be designed to minimize massing, shadowing, visual impact, and the obstruction of views from the street, public spaces, and neighbouring properties. To achieve these objectives, high rise buildings should take the form of slender towers. High rise buildings should not be designed with long axes where they create an overwhelming building mass.

295_ Residential and mixed-use buildings should include outdoor amenity spaces.

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

Given commentary provided in this Report, it is our opinion that the design elements of the planned mixed-use, high-rise tower are in keeping with the aforementioned design direction. Most notably, collectively the components of the tower design are intended to: promote a definable sense of place and a recognizable community character; integrate within the local development context; effectively transition height and massing; and minimize potential impacts on adjacent properties.

The following represent related urban design considerations that, in our opinion, also align with the referenced City Design policy structure:

- The proposed tower podium would incorporate articulated façades, prominent entrances and reduced building setbacks to contribute positively to the pedestrian character and street edge along Ridout Street North and King Street;

- A public plaza is planned to provide pedestrian access into and through the site to the Middlesex County Court House and Gaol, Ivey Park and the Thames Valley Parkway;
- Podium elements would include direct accesses to Ridout Street North, King Street and the proposed plaza;
- Vehicular accesses to the Site would be provided from Ridout Street North to a layby area and from King Street to the structured parking facility; and
- The proposed towers and the associated site layout would be designed to a high standard and would include contemporary urban design elements, where practical and appropriate.

4.2.7 Downtown Place Type and Protected Major Transit Station Area Policies

4.2.7.1 Designations

The subject lands are within the Downtown place type and the Downtown Protected Major Transit Station Area pursuant to Map 1 (Place Types) and Map 10 (Protected Major Transit Station Areas) of the London Plan, respectively. The following addresses related policy direction for both of these designations which, in our opinion, have relevance to this proposal.

4.2.7.2 Vision and Permitted Uses

Policies 793, 796 and 798 of the Official Plan address the vision and role of the Downtown in the City of London structure:

“793_ Our Downtown will exude excitement, vibrancy, and a high quality of urban living. It will be the preeminent destination place for Londoners, residents from our region, and tourists to experience diverse culture, arts, recreation, entertainment, shopping and food. Our Downtown will showcase our history and offer vibrant and comfortable public places filled with people, ranging from large city-wide gathering places, to heavily treed urban plazas and intimate parkettes.

796_ Our Downtown will be an exceptional neighbourhood unto itself - with housing, services, and amenities targeted to serve a wide spectrum of lifestyles such as families, seniors, and young adults. The shared economy will thrive in our core, including such features as shared office and work space, as well as shared car and bicycle fleets. Our Downtown will be the most highly connected location in the entire city, being the hub for rapid transit, rail, high speed rail, and the multi-use pathway along the Thames River. Downtown will offer the city’s premier pedestrian experience.

798_ As shown in our City Structure Plan, the Downtown will serve as the highest-order mixed-use centre, and will be unique in the city. It will be connected to the transit villages through rapid transit corridors, and will also be connected to our recreational

network, at the confluence of the two branches of the Thames River. Major rail lines, serving commuter traffic, strongly connect our Downtown to the surrounding region, nationally and internationally” [emphasis added].

Policy 800 further states that that the Downtown is the highest-order mixed-use activity centre in London and that a broad range of residential, retail, service, office, cultural, institutional, hospitality, entertainment, recreational, and other related uses are permitted in this place type. With respect to development intensity, Policy 802 and Table 8 of the Official Plan prescribe that the standard maximum building height within the Downtown place type is 20 storeys, with the upper maximum height being 35 storeys. This Policy also identifies the following relevant provisions relating to the consideration of development proposals within this place type:

- “2. Tall buildings will be permitted only where they achieve a high level of design excellence in conformity with the City Design policies and in accordance with associated guidelines of this Plan.
3. The evaluation of height and built form will consider access to sunlight by adjacent properties, wind impacts, view corridors, visual impacts on the Thames Valley Corridor, and potential impacts on public spaces and heritage properties located in close proximity to proposed development.

Given this policy framework, in our opinion the components of this proposal are consistent with the guiding vision for the Downtown place type, as well as intensity provisions supporting the introduction of mixed-use, high-rise forms within this place type. The proposal does not conform with the height permissions of Policy 800 and Table 8 of The London Plan, which prescribe that buildings in this place type are to have an upper maximum height of 35 storeys.

Accordingly, an OPA is necessary to permit building forms on the Site having maximum heights of 43 and 53 storeys. In our opinion, to implement the project under the policies of The London Plan, this amendment would need to (1) add a Specific Area policy for the Transit Village place type and (2) delineate the subject lands on Map 7 (Specific Policy Areas).

4.2.7.3 Built Form Policies

Policy 803 of The London Plan identifies a series of built form policies for the Downtown place type. In our opinion, the following policies are have particular relevance to this application:

- “1. All planning and development applications will conform with the City Design policies of this Plan, and have regard for Our Move Forward: London's Downtown Plan and the Downtown Design Manual.
2. All planning and development applications will be consistent with the Downtown Heritage Conservation District Plan.

3. All the planning and design that is undertaken Downtown will place a priority on the pedestrian experience through site layout, building location, and a design that reinforces pedestrian comfort and safety.
4. The design and positioning of new buildings in the Downtown will not negatively impact pedestrian comfort by introducing inappropriate wind turbulence and velocity within the public realm. A wind assessment will be required for all buildings of 6 storeys or more, with the intent of mitigating wind impacts on the pedestrian and other ground level environments.
5. Buildings should be designed to include architectural features that protect pedestrians from rain and sun exposure. Such features include, but are not limited to, awnings, arcades, and overhangs and should be designed in an unobtrusive manner.
6. The design of new development will provide for continuity and harmony in architectural style with adjacent uses that are of architectural or historical significance.
7. Building design that represents individual creativity and innovation will be encouraged within the Downtown to create landmarks, develop a distinctive character for the Downtown, and contribute to the city's image."

The concept plan, elevations and renderings presented in this Report illustrate that this development has regard for these matters and that a high design standard is to be applied to this project. Further, the site and building design is intended to contribute positively to both the local streetscape and the City's Downtown skyline.

Additionally, in our opinion:

- The prominent design elements of the tower would create an attractive gateway feature for downtown London and the Forks of the Thames activity area;
- The Site orientation and building design (podium and towers) have consideration for the local development context and has been assessed relative to the Downtown Heritage Conservation District Plan (as detailed in the HIA);
- The contemporary design of this high-rise building and associated landscaping complement the adjacent streetscape along Ridout Street North and King Street.

Taking these matters into account, in our opinion, the design concept is in keeping with the built form policy permissions of this Official Plan.

4.2.7.4 Downtown Protected Major Transit Station Area

Policy 803E of The London Plan states that a broad range of residential, retail, service, office, cultural, institutional, hospitality, entertainment, recreational, and other related uses are

permitted in the Downtown Protected Major Transit Station Area (DPMTSA). With respect to development intensity, the following policy direction is provided for this defined area:

“803B_ The Downtown Protected Major Transit Station Area will be planned to achieve a minimum number of 280 residents and jobs combined per hectare.

803C_ Within the Downtown Protected Major Transit Station Area, the minimum building height is three storeys or nine metres and the maximum building height is 35 storeys.

803D_ Within the Downtown Protected Major Transit Station Area, the minimum density is 60 units per hectare for residential uses or a floor area ratio of 0.6 for non-residential uses.”

It is our opinion that the proposed development is in keeping with Policies 803C, 803D and 803E, in light of the following considerations:

- Based on the following methodology and density values set out in the City of London 2021 Development Charges Background Study Update (draft), dated June 2020, the proposal far exceeds with the minimum expectation for residents and jobs per hectare prescribed in Policy 803B:
 - Total development area: 0.801 ha
 - Total dwelling units at build-out: 800 units
 - Total population at build-out (800 units x 1.68 persons/unit): 1,344 persons
 - Estimated employment at build-out ($13,785 \text{ m}^2 \div 39.5 \text{ m}^2/\text{worker}$): 349 jobs
 - Total residents and jobs per hectare ($1,693 \text{ persons/jobs} \div 0.801 \text{ ha}$): 2,114 persons/jobs per ha
- The proposed towers would yield (1) a residential density of 999 units/ha, excluding equivalent non-residential units and (2) a floor area ratio of 1.72 for non-residential uses. Accordingly, the proposal also satisfies the minimum intensity requirements of Policies 803C and 803D.
- With implementation of this proposal, a mix of residential and service/retail commercial uses would be accommodated within the Site. The intended mix of uses would be consistent with the permitted use policies of Policy 803E.

Notwithstanding, in relation to Policy 803C, an OPA is necessary to permit building heights on the Site exceeding 35 storeys. In our opinion, a Specific Area policy is required to permit this project in the context of the DPMTSA policy framework.

4.2.8 Impact Mitigation

Policy 1638 prescribes that a site-specific ZBA is required to exceed the standard maximum height and an OPA is required to exceed the upper maximum height. With respect to the

required ZBA process, it is further stated in Policy 1640 that, “Through the amendment process the community, City Council and other stakeholders can be assured that measures will be implemented to mitigate any impacts of additional height or density.” Policy 1641 further states that increases in form and intensity may be permitted where the proposed development represents good planning within its context.

To address the direction set out in the aforementioned policies, as itemized below, 50 King Street London Limited is proposing several design elements to help effectively integrate the project into the local development setting and to mitigate any potential land use impacts associated with the proposed tower heights.

Planned Mitigation Measures:

- **Site/Building Design.** As discussed in this Report, collectively the building design and site layout incorporate contemporary architectural themes and design elements that are intended to be compatible with, and complimentary to, the surrounding land uses and the larger downtown London development context. Additionally, all vehicular parking is to be accommodated in a structured parking facility screened from the public realm;
- **Sustainable Development.** The proposed tower development would be designed with consideration for suitable sustainability techniques, materials and systems. Further, landscape layouts for common outdoor amenity areas would consider sustainable design elements;
- **Active Transportation.** Secure bicycle parking would be provided in the structured parking facility. Walkway connections from the podium and through the Site provide connectivity to the street frontages, bike lanes, transit stops and municipal pathways.

In light of these considerations and commentary provided in this Report, in our opinion, the additional building height associated with this project is (1) appropriate for this downtown London location and (2) mitigated by design elements intended for the project. It is therefore our opinion that the proposed tower height represents good planning within its context.

4.2.9 Our Tools

4.2.9.1 Guideline Documents

Within the Our Tools part of the Official Plan, Policy 1712 identifies that, “City Council may adopt guideline documents to provide direction for the implementation of the policies of this Plan or to guide development of a specific area”. Policies 1716 to 1722 itemize a number of approved guidelines, including the following that, in our opinion are relevant to this proposal.

- City of London Placemaking Guidelines (City Design Guidelines as per Policy 1716);
- Downtown Design Study – Design Guidelines (City Design Guidelines as per Policy 1716);

- Our Move Forward: London's Downtown Plan (Urban Regeneration Guidelines as per Policy 1717); and
- Thames Valley Corridor Plan (Parks, Recreation and Open Space Guidelines as per Policy 1720).

The One River Master Plan Environmental Assessment Study was developed with consideration for the Thames Valley Corridor Plan and is assessed in conjunction with the Corridor Plan in the subsequent section. The Core Area Action Plan is also considered in this review, given the location of the Site in downtown London.

Further, Policy 575 provides that the City Council may designate areas of London as heritage conservation districts (HCDs) in accordance with the OHA. As per Map 9 (Heritage Conservation Districts and Cultural Heritage Landscapes) of the Official Plan, the subject lands are within the Downtown HCD Plan area designated under Part V of the OHA.

The aforementioned policy and guideline documents are reviewed in the subsequent subsections of this Report. Additionally, Map 8 (Community Improvement Project Areas) of The London Plan identifies that the Site is located within boundaries of the Core Area Community Improvement Project Area and the Downtown Community Improvement Project Area. The goals and incentive programs of these Project Area's respective Community Improvement Plans were also reviewed in the preparation of this Report. Based on our review, the proposal aligns with the intent of these plans to support initiatives to promote and revitalize the downtown core.

City of London Placemaking Guidelines

The City of London Placemaking Guidelines, dated November 2007, are intended to promote liveable communities, an identifiable character and a sense of place. Notwithstanding that this Guideline is generally intended for large scale 'greenfield' development, a number of objectives set out in this document are relevant to redevelopment and intensification plans.

The following summarizes the principal (core) Placemaking Guidelines that provided design direction for this project (paraphrased):

- Visually integrate natural features, such as slopes, trees, and water courses into the community design as visual and physical focal points.
- Establish key social, pedestrian and public transit connections between new development and the existing fabric of the city.
- Develop an overall concept plan which clearly identifies the relationship between land uses, built form and natural features of the community.
- Identify, create and integrate views and vistas, capitalizing upon these opportunities by offering pedestrian, bicycle and automobile access to these points.

- Develop a circulation plan identifying where linkages would be established to support pedestrian, automobile, cycling movements throughout the community.
- Buildings should be located close to the street and should be architecturally articulated to provide an appropriate level of detail that would visually animate the streetscape.
- Landmarks such as heritage buildings and structures should be retained and integrated into the community design as focal points.
- Design convenient pedestrian linkages to focal points and public transit.
- Avoid architectural designs that are ubiquitous and non-descript because they do not contribute to a sense of place.
- Design pedestrian environments that provide a sense of safety and separation from automobile traffic.
- Orient buildings, their massing, architectural elements and habitable areas so that they promote an eyes-on-the-street approach to streetscapes and public spaces.
- Use architectural and landscape design to enhance visually prominent locations.
- Design buildings and spaces to encourage social interaction.
- Where possible, design and develop communities to include mixed use buildings or complexes.

Downtown Design Study – Design Guidelines

The City of London Downtown Design Study – Design Guidelines, dated May 1991, identifies preferences for the design and development in the downtown core. Relevant to the proposal, the Design Guidelines include direction for building envelopes and relations of buildings and plazas to the street. The following design guidelines have provided direction for the proposal (paraphrased):

- The perception of building height from the sidewalk is an important factor in maintaining a pleasant pedestrian environment. It is desirable to retain the scale and perception of spatial enclosure. New development is encouraged to retain a three to four storey height at the building line;
- It is preferable for buildings facing the Forks of the Thames exceeding 18 m in height to be oriented with their long axis perpendicular to open spaces to maximize view opportunities;

- Buildings exceeding 18 m in height are encouraged to incorporate a 5 metre setback at the building line, to maintain the pedestrian-oriented character of the streets west of Wellington Street within the downtown;
- Street level facades should avoid continuous blank walls and are encouraged to have retail uses with direct visual/physical connections to the street and permissive glazing;
- Building cantilevers should generally be open to the adjacent sidewalk areas, provide weather protection and should provide for the continuity of pedestrian movement between covered spaces and sidewalk areas; and
- Plazas are encouraged to provide a sense of spatial definition for pedestrian oriented activities, and integrate linkages and visibility from street-level sidewalks.

The design of the proposed development has been informed by these guidelines. Specifically, a cantilevered three to four storey podium is provided to maintain the pedestrian-oriented sidewalk environment, a step back is provided from the podium in the positioning of the towers and the plaza is directly accessible from the Ridout Street North sidewalk and includes spatial definition to guide the movement and leisure activities of pedestrians.

Our Move Forward: London's Downtown Plan

Generally, the framework of Our Move Forward: London's Downtown Plan (Council-adopted April 15, 2015) provides consideration for the existing development context and establishes a planning structure for future public and private investment in the City's core. Further, this Plan establishes several overarching values, directions and themes to achieve the defined Downtown vision statement: "London's face to the world. A vibrant destination. A unique neighbourhood".

Nine specific 'Downtown' values are established in the Downtown Plan: Leadership, Prosperity, Sustainability, Livability, Innovation, Partnership, Inclusivity, Experience and Heritage. Moreover, six 'Strategic Directions' are identified to support the identified values for this area:

1. Make Dundas Street the most exciting place in London;
2. Reconnect with the Thames River;
3. Forge connections with the downtown neighbourhoods;
4. Green our downtown;
5. Build a great neighbourhood; and
6. Create the buzz.

In our opinion, the characteristics of this development proposal illustrate that the project is in keeping with the values, strategic directions and associated urban design objectives of the Downtown Plan. In particular, it is our opinion that the project supports those initiatives

related to reconnecting with the Thames River, building a great neighbourhood and 'creating the buzz'. The merits of this project relative to these Strategic Directions is summarized below.

- **Reconnect with the Thames River.** Strategic Direction 2 of the Downtown Plan addresses a City objective to reconnect London residents with the Forks of the Thames activity area. In this regard, it is noted in the Plan that,

"The river is also a draw for events and represents an opportunity for new active uses. In re-establishing the connection to the Thames River, we can help to create a London that is a vibrant and dynamic city that embraces both its cultural heritage and natural environment."

As discussed in this Report, it is our opinion that the form and design of the planned building would create an attractive gateway feature to help frame this activity area and connect the pedestrian environment of Ridout Street North to the riverfront through the provision of a public plaza. In our opinion, both of these measures support the core objectives of this Strategic Direction.

- **Build a Great Neighbourhood.** In relation to Strategic Direction 5, it is stated in the Downtown Plan that,

"The downtown is the "hub" for the city, but it is also a neighbourhood where people can live and be social. It is imperative for the downtown's success to ensure that it is designed to be a neighbourhood first, by providing for the local needs of the residents in the area."

As identified in this Report, the proposed high-rise building is designed to function as a community focal point that complements surrounding land uses, the local development context and the larger downtown core. In light of the building positioning, site layout, architectural design, and intended uses, it is our opinion that the proposal supports the broad objective of this Strategic Direction to enhance the function of the local neighbourhood.

- **Create the buzz.** The Downtown Plan states the following in relation to Strategic Direction 6,

"The diversity, intensity and density that uniquely characterize the core makes it ideally suited to consider unconventional ideas and fertile ground for testing new ways of doing things."

In our opinion, the intent of this proposal, to integrate a high-rise building with public space to further define the Downtown's western gateway and the Thames River corridor, closely aligns with the type of innovative, intensive project envisioned to support this Strategic Direction.

Map 5 of the Downtown Plan identifies the western portion of the Site as an underutilized priority site for redevelopment. As set out in Redevelopment Opportunities section of this Plan, underutilized sites are recognized to present an opportunity for new development that could bridge street wall gaps and/or link activity generators. In accordance with this recognition and direction, the proposal provides a redevelopment concept for the Site that provides public space connections between street frontages and Ivey Park, and contributes to street walls particularly at the intersection of Ridout Street North and King Street.

The Downtown Plan also sets out a variety of initiatives that support ten 'Transformational Projects' designed to help implement the vision, values and strategic directions of this guideline. Transformational Projects are described in the Downtown Plan as initiatives that are:

"... designed to act as anchors for future development and to encourage more private sector investment to provide maximum benefit for the downtown and assist with continued revitalization of this important area of the city".

The Site is located within the boundaries Transformational Project 3: Forks of the Thames. This project envisions an urban promenade along the Thames River corridor and an urban park space at the western terminus of Dundas Street. Generally, the intent of this initiative is to better connect activity on Dundas Place with riverfront activities.

In our opinion, this proposal supports the Forks of the Thames initiative as it would (1) provide public spaces and accessible pedestrian connections between the adjacent street frontages, Ivey Park and the Thames Valley Parkway and (2) help revitalize the area with new residents and employees. In this respect, it is fully anticipated that development of the proposed building would contribute to the overall vibrancy of the Downtown.

Thames Valley Corridor Plan

The City of London Thames Valley Corridor Plan, dated December 2011, recognizes the Thames Valley Corridor as London's most important natural, cultural, recreational and aesthetic resource that is to be preserved and enhanced.

As per Figure 1 (Land Use Context) of the Corridor Plan, the subject lands are outside of the Thames Valley Corridor Boundary. Figure 2 (The Forks) recognizes Ivey Park, adjacent to the subject lands, as an existing activity area and the subject lands as part of the Central Business District. Based on our review, there are no specific guidelines applied to the subject lands within the Corridor Plan. Notwithstanding this context, it is recognized that the proposal does provide pedestrian connections to Ivey Park to support the recreational function of this activity area.

One River Master Plan Environmental Assessment

The One River Master Plan Environmental Assessment (EA) was prepared for the City of London by a consulting team including Jacobs. Figure 1-1 of the associated study report, dated June 2019, identifies that the subject lands are within the River Management Strategies Master Plan EA Study Area, as well as the Forks of the Thames Schedule B EA Study Area.

Section 9 (Recommendations Summary) of the study report sets out that the goal of this EA is, "... to develop a strategy for the Thames River that would provide guidance on the future of the Springbank Dam, the Forks of the Thames and the river corridor itself within the City of London." This Section further summarizes a number of recommendations associated with Forks of the Thames including improvements proposed for portions of Ivey Park. Based on our review, the EA recommendations and the associated documentation in the report, the project should not impact on the implementation of study recommendations.

Core Area Action Plan

Generally, the Core Area Action Plan, dated October 29, 2019, was developed by the City of London to support the health, vitality and resiliency of the City's downtown core. Map 1 of the Plan illustrates that the Site is located within the defined Core Area boundaries. Within the Our Vision, section of the Plan, several guiding objectives are set out for this Core Area:

- "• Signals our city's economic vibrancy and attraction;
- Helps us to attract and retain talent and investment;
- Tells the story of who we are as a city;
- Serves as a canvas for culture, arts, music and entertainment;
- Is safe, secure and welcoming for a broad diversity of people;
- Offers strong local and tourist attractions;
- Provides opportunity for business success;
- Offers compassionate care for those who need it;
- Is buzzing with activity at all times of the day and night; and,
- People can proudly identify as their home and neighbourhood."

The Plan sets out a number of short-, medium- and long-term actions to support this vision and to address key concerns associated with the core area (e.g., homelessness, security, business retention/attraction). In our opinion, the proposed development supports the broad direction of this Plan to revitalize the core area increasing the residential population in the community, by providing additional retail and office space to support business opportunities, by providing a high quality design, and by introducing a public plaza to promote social interaction and connectivity to the riverfront.

Downtown Heritage Conservation District Plan

The Downtown London Heritage Conservation District (HCD) Plan (2012) was established to provide a framework for the protection, management and enhancement of the heritage attributes of the downtown. The HIA prepared by MHBC provides a detailed review of the project relative to the principles and objectives of the Downtown Heritage Conservation District Plan.

4.2.9.2 Evaluation Criteria

The proposed use of the Site has been evaluated in the context of the Evaluation Criteria for Development Applications policies of the Our Tools part of The London Plan (Policies to 1577 to 1579).

In our opinion, the proposal demonstrates consistency with the PPS and conformity with the policy direction and provisions of The London Plan, including the use, form and intensity policies of the Downtown place type, recognizing that the intensity of the project requires a Specific Area provision to establish conformity with this Official Plan. It is also our opinion that the intended design components of the planned mixed-use, high-rise development and the associated site layout should not generate significant land use impacts, particularly in relation to loss of privacy, shadowing and traffic management. Further commentary presented in this Report identifies that, in our opinion, the project represents an appropriate development for the subject lands and would fit effectively within the downtown London context.

4.2.10 Specific Area Policies

Policy 1730 of the Plan states that policies for Specific Areas may be applied, "... where the applicable place type policies would not accurately reflect the intent of City Council with respect to a specific site or area". This Policy further prescribes that Specific Area policies may be considered in limited circumstances where five specific conditions are satisfied. The following evaluates the proposal relative to each condition:

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

Based on our review of The London Plan policies and permissions, in our opinion, this residential development proposal satisfies all policies of the Plan other than the standard and upper maximum building height permissions.

"2. The proposed policy does not have an adverse impact on the integrity of the place type policies or other relevant parts of this Plan."

The OPA application seeks to exceed the 35 storey maximum upper building height permission of the Downtown place type and the maximum building height permission for the DPMTSA. In our opinion, the merits of this proposal set out in this Report warrant the

requested 53 storey maximum building height (e.g., prominent tower design, gateway location, high design standard, compatibility with local development context, complementary design and uses, proximity to shopping, employment, transit, bike lanes and pathways).

Given these design and locational merits, and related commentary in this Report, in our opinion this proposal would not adversely impact on the integrity of associated Downtown place type and DPMTSA policies or applicable City Design policies.

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

As discussed in this Report, the proposed redevelopment plan would integrate prominent high-rise towers with adjacent development at a strategic gateway/riverfront location situated in downtown London and supported by the City’s higher-order road network and transit services, including proximity to a planned BRT station. In our opinion, this proposal represents a site-specific development opportunity that would not establish a precedent for other properties in the downtown core.

“4. The proposed use cannot be reasonably altered to conform to the policies of the place type.”

The massing, orientation and articulation of the proposed high-rise towers are designed: to be compatible with surrounding land uses; to complement the local development context; to promote compact, efficient development; and to support intensification within the Downtown Place type. The requested building height permits the proposed unit yield to be contained within efficient towers while also accommodating office/commercial space and administrative/lobby space in the podium. In our opinion, this podium and tower configuration contributes positively to the existing pedestrian oriented streetscape and adjacent public spaces.

In order to bring the proposal into conformity with The London Plan permissions, at a minimum, the tower height would need to be decreased to a maximum of 35 storeys which would substantially reduce the total unit yield if the proposed floor plate configuration is maintained. Alternatively, to accommodate the intended unit yield, the floorplate would need to be widened in a manner that could potentially (1) increase shadowing impacts on adjacent properties and/or (2) create a building mass that is less visually attractive. In our opinion, both of these potential modifications would detract from the overall merits of the proposal identified in this Report. Accordingly, to achieve the design objectives for this project, it is our opinion that the tower design cannot be reasonably altered to align with the maximum building height permission of The London Plan.

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

Given planning rationale set out in this Report, with the benefit of the proposed Specific Area policy, in our opinion the applications are consistent with the policy direction and objectives

of the PPS and The London Plan. Accordingly, it is our opinion that for this distinctive project, a Specific Area policy represents good planning and would appropriately implement the proposal.

Additionally, Policy 1732 of The London Plan states that all applications contemplating policies for Specific Areas are subject to the Planning and Development Applications component of the Plan. Specifically, Policy 1578 of the Plan sets out a variety of criteria to be considered when evaluating the merits of planning applications.

In our opinion, relevant matters set out in Policy 1578 have been contemplated in the building design and site layout, and related policies have been addressed in this Report. Most notably, Sub-Policy 6 identifies a number of potential impacts to nearby properties to be evaluated in the context of a development application. In our opinion, collectively, the design elements of this proposal serve to address several key considerations identified in this Sub-Policy, including traffic and access management, parking, shadowing, visual impacts and impacts on cultural heritage resources. Additionally, with respect to Sub-Policy 7 which addressees fit, in our opinion the proposed building form and site layout demonstrate that the project is designed to be compatible with, and complementary to, the surrounding development context.

Given the foregoing, in our opinion, the proposal satisfies the framework of planning criteria prescribed in The London Plan for a Specific Area policy.

4.2.11 Community Consultation Strategy

With respect to the compatibility considerations set out in Policy 1578, 50 King Street London Limited intends to carry out public consultation for this application consistent with the requirements of the *Planning Act*.

4.2.12 Summary

In light of these considerations, it is our opinion that the proposed development supports the broad vision and role established for the Downtown place type and the Downtown Major Protected Transit Station Area in The London Plan. Further, with a Specific Area policy allowing for a maximum building height of 53 storeys, the proposal would align with the permissions prescribed in The London Plan and the design direction provided in related guideline documents.

5.0 ZONING BY-LAW ANALYSIS

5.1 Existing Zoning

Figure 10 of this Report illustrates that the 50 King Street property is zoned Downtown Area (DA1) with the following additional zone provisions pursuant to Schedule “A” of the City of London Zoning By-law Z.-1 (Zoning By-law).

- A maximum density permission of 350 units/ha (D350);
- A maximum height permission of 15 m (H15);
- Bonusing provisions (B-36) permitting a mixed-use apartment building with a maximum height of 95 m (28 storeys), a maximum density of 750 units per hectare, and a minimum setback of 0 metres for the residential component of the building in return for the facilities, services and matters outlined in site-specific ‘Bonusing Criteria’; and
- Holding provisions: to ensure development over 30 metres in the DA1 Zone will not have an adverse impact on pedestrian level wind conditions in the Downtown Area (h-3); to ensure development is compatible with adjacent land uses through site plan agreements (h-5); to ensure that archaeological resources (if present) are conserved (h-18); to ensure sanitary and stormwater management systems are implemented (h-149); and to ensure that there will be no impacts to adjacent heritage resources (h-207).

As illustrated in Figure 11, the portion of 399 Ridout Street within the development area is zoned Community Facility (CF1) and Downtown Area (DA2) with a maximum permitted density of 350 units/ha (D350) and a maximum permitted height of 15 m (H15).

Section 20.1 of the Zoning By-law states that the Downtown Area (DA) Zone, “... provides for and regulates the City's most dominant and intensive commercial business area which serve the City and region”. It is also stated in this Section that the DA1 Zone variation is applied to the main retail shopping area centred along Dundas and Richmond Streets and the DA2 Zone is applied to peripheral areas of the downtown. Generally, the DA1 and DA2 Zones permit a wide variety of land uses including retail stores, institutional uses, offices, public facilities and apartment buildings. Section 32.1 of the Zoning By-law states that the Community Facility (CF) Zone provides for and regulates institutional type uses that provide a city-wide or community service function.

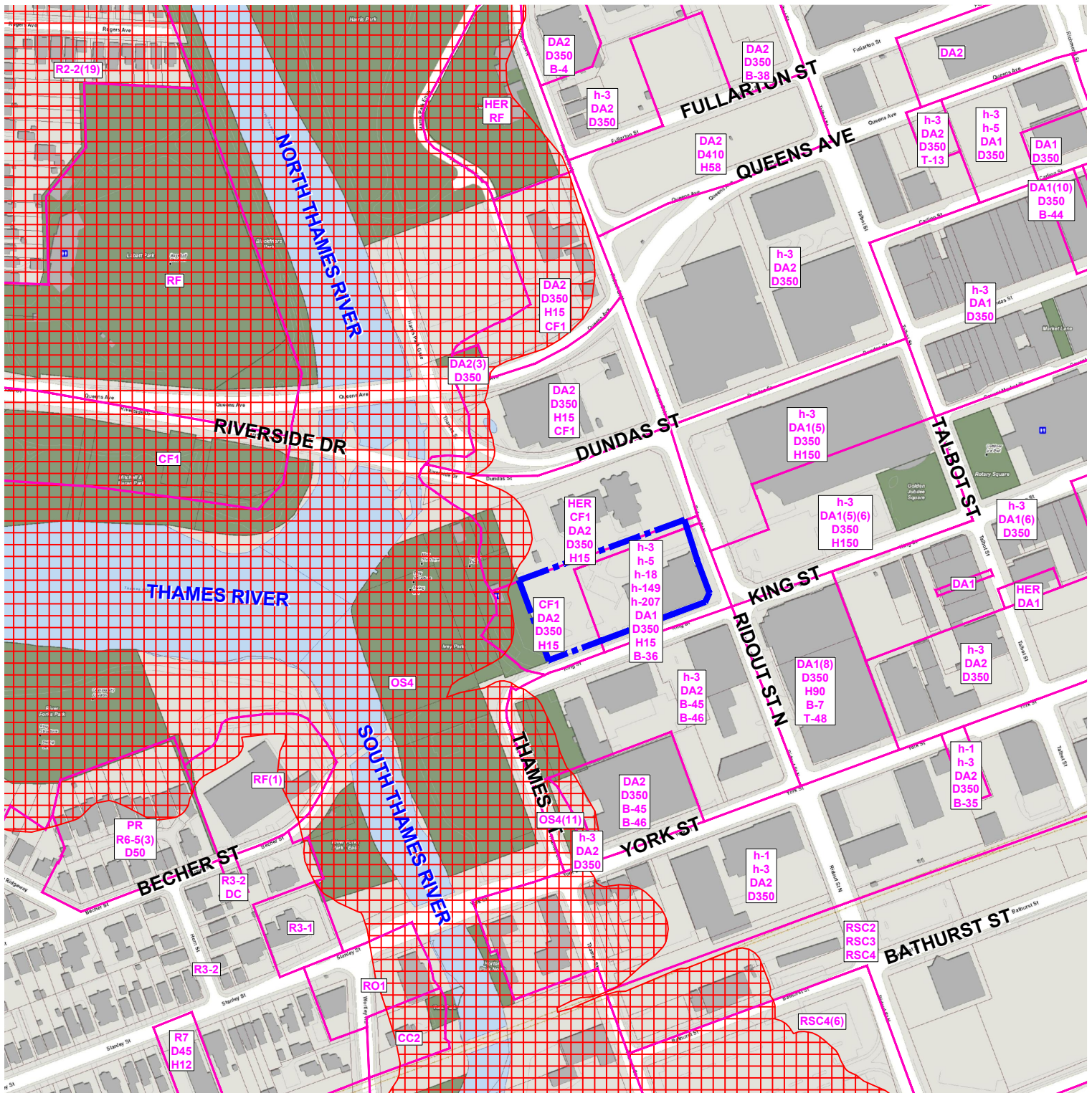


Figure 10
City of London
Existing Zoning
Zoning By-law No. Z-1

50 King Street
City of London
Ontario

LEGEND



Subject Lands



Zone Limit



Conservation Authority Regulated Areas

R2	Residential R2 Zone	h	Holding Provision
R3	Residential R3 Zone	H	Height Provision
R6	Residential R6 Zone	PR	Private Road Provision
R7	Residential R7 Zone	D	Density Provision
RO	Restricted Office Zone	B	Bonusing Provision
DA	Downtown Area Zone		
RSC	Restricted Service Commercial Zone		
CC	Convenience Commercial Zone		
RF	Regional Facility Zone		
CF	Community Facility Zone		
HER	Heritage Zone		
DC	Day Care Zone		

Source:
CityMap, City of London (c) 2023

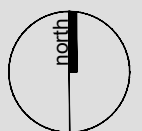
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K:\1094BC-50 KING ST LONDON\REPORT\FIGURES.DWG



**PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE**

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The existing DA1, DA2 and CF Zone structure does not permit the building height and density associated with this project. Accordingly, a Zoning By-law Amendment is required to facilitate the proposed development.

5.2 Proposed Zoning

5.2.1 Zoning Review

Following an analysis of the Zoning By-law, it is our opinion that the form and scale of the proposed development most closely aligns with the planned function of the Downtown Zone regime and the standard permissions of the DA2 Zone variation.

Table 20.3 of the Zoning By-law presents the site and building regulations for the DA2 Zone. The following table compares the concept plan layout with several of applicable development regulations. Additionally, a Zoning Data Sheet has been prepared by MHBC in support of the OPA and ZBA applications.

Table 4.0 - Selected Zoning Regulations (DA2 Zone)

Regulation	Required	Provided
Lot Area (min.)	N/A	0.801 ha
Lot Frontage (min.)	3.0 m	61.8 m
Building Setbacks (min.)		
Front Yard	0.0 m	0 m
Interior Side Yard	0.0 m	8.7 m
Exterior Side Yard	0.0 m	0.0 m (King Street)
Rear Yard	0.0 m	6.9 m
Lot Coverage (max.)	95%	39.3 %
Landscaped Open Space (min.)	5%	48.9 %
Building Height (max.)	15 m	175.3 m
Floor Area Ratio for Non-Residential Uses	6:1	1.72:1
Gross Floor Area Retail Maximum	The lesser of 20% or 5,000 m ²	2,865 m ²
Location of Residential Uses	N/A	Above the 4 th floor
Residential Setback for Buildings	64.1 m (0 m as per B-36)	0.0 m
Location of Retail Uses	Restricted to the 1 st and 2 nd floors	Within the 1 st floor
Off-Street Parking (min.)	N/A*	550 spaces
Barrier Free Parking (min.)	2 spaces plus 2% of provided parking stalls (13 spaces)	14 spaces
Residential Density (max.)	350 units/ha	1,172 units/ha

Regulation	Required	Provided
Bicycle Parking (min.)	700 long-term spaces 137 short-term spaces	300 long-term spaces 50 short-term spaces

*As per Section 4.19 and Figure 4.19 of the Zoning By-law, the Site is within an area exempt from minimum parking standards.

5.2.2 Site-Specific Zoning Provision

As illustrated, the proposed building scale and site layout meets most standard DA2 Zone regulations; however, a site-specific DA2 Zone variation is proposed to address the following matters and to provide flexibility to accommodate minor design modifications that may arise during project planning:

1. Apply a site-specific maximum height ('H') provision of 176 m to reflect the planned 53 storey high-rise building;
2. Allow for a maximum density ('D') of 1,175 units/ha to permit the Site to be redeveloped for an intensive mixed-use form that will support the efficient use of existing infrastructure and public services;
3. Permit the residential components of the building to be positioned at, or near, the street frontage to promote a prominent street wall and to support an intensive building form; and
4. Reduce the number of required long-term and short-term bicycle parking space, as the Site's proximity to downtown London, public transit and the future BRT system provides transportation alternatives for residents, employees and patrons.

Figure 11 illustrates the **Downtown Area Special Provision (DA2(_)*D1175*H176) Zone** proposed to accommodate the proposed mixed-use, high-rise tower.

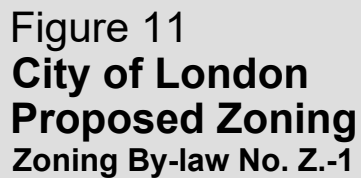


Figure 11
City of London
Proposed Zoning
Zoning By-law No. Z.-1

LEGEND

Subject Lands

Zone Limit

Conservation Authority Regulated Areas

Residential R2 Zone

Residential R3 Zone

Residential R6 Zone

Residential R7 Zone

Restricted Office Zone
 Restricted Access Zone

Downtown Area Zone
Restricted Service Commercial Zone

Restricted Service Commercial
Convenience Commercial Zone

Regional Facility Zone

Community Fa

Heritage Zone

Day Care Zone

Holding Provision

Height Provision

Rivate Road Provision

Density Provision

Bonusing Provision

City of London (c) 20

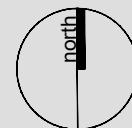
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FILE: 1094BC

DRAWN: PL

K:\1094BC-50 KING ST LONDON\RPT\REPORT FIGURES.DWG



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6.0 CONCLUSIONS

In conclusion, the requested amendments to the City's Official Plan (The London Plan) and Zoning By-law are appropriate for the Site, compatible with the existing development context and in keeping with the framework of planning policy. This assessment is based, in part, upon consideration of the following merits:

- The project supports the redevelopment of lands in the City's downtown that are designated for high density residential, office and commercial uses and are located within a Protected Major Transit Station Area;
- The Site is appropriate for this development proposal considering its physical characteristics, its location within an established mixed-use development area and its proximity to existing offices, retail/service commercial enterprises, government activities, recreational, entertainment and cultural facilities, parks, public transit services and the planned BRT system;
- The massing, orientation and articulation of the proposed high-rise development is designed: to be compatible with surrounding land uses; to complement the local development context and to promote compact, efficient development. Additionally, design elements integrated into the proposal promote an attractive and prominent building form that would contribute positively to the local streetscape and establish a landmark development for the Forks of the Thames activity area and, more broadly, downtown London;
- The number and range of apartment units planned for the upper floors of the towers would broaden housing choice within Central London and respond to market demand. In effect, this project would help the City accommodate its forecasted population growth and achieve its projected housing requirements;
- The office/commercial uses intended for the podium component of the project would complement the local development setting, while also contributing to the downtown's planned function as the highest-order, mixed use centre within the City;
- Preliminary assessments indicate that existing road network can accommodate the proposed development and that adequate servicing infrastructure is available to service this project;

- In our opinion, this proposal: is consistent with the Provincial Policy Statement; has regard for the principles and policy objectives of The London Plan; and aligns with the design direction of the City's Placemaking Guidelines and Downtown Plan;
- The proposed site-specific zoning structure would appropriately implement the intended building design and site layout; and;
- The development represents good planning.

Given the noted considerations, it is recommended that the City of London approve the Official Plan Amendment and Zoning By-law Amendment applications, as proposed.

Respectfully submitted,

**MHBC
DRAFT**



Scott Allen, MA, RPP
Partner



Juliane Von Westerholt, BES, MCIP, RPP
Associate

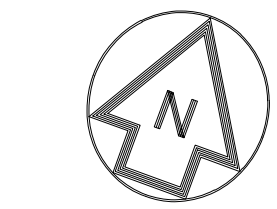


Rachel Neiser, MSc
Planner

APPENDIX A

CONCEPT PLAN;
PEDESTRIAN/VEHICULAR CONNECTIVITY PLAN;
MAIN FLOOR

Site Development Stats		
50 King St.		
ITEM	PROVIDED	
1 LOT AREA (MINIMUM)	7997.0 sqm	
1a LOT AREA - ROAD WIDENING	7730.0 sqm	
2 FRONT YARD SETBACK (KING ST.) (MINIMUM)	0 m	
3 EXTERIOR SIDEYARD SETBACK (RIDOUT ST.) (MINIMUM)	0 m	
4 REAR YARD DEPTH (Tower 1- Abutting Existing Jail)	29.0 m	
5 REAR YARD DEPTH (Tower 2- Abutting Existing Courthouse)	14.2 m	
6 INTERIOR SIDEYARD DEPTH (Abutting Proposed Lower Courtyard)	7.6 m	
7 LANDSCAPE OPEN SPACE (Coverage A) (% MINIMUM)	4781.0 sqm	
8a Building Coverage (Tower 1 - Coverage B)	1029.0 sqm	
8b Building Coverage (Tower 2 - Coverage B) (% MAXIMUM)	2187.0 sqm	
9 AVERAGE GRADE (MIN. @239.0m - MAX. @244.80m)	241.85m	
9a BUILDING HEIGHT (Tower 1) - @241.85m Grade	175.26m	
9b BUILDING HEIGHT (Tower 2) - @241.85m Grade (M MAXIMUM)	144.76m	
10 DENSITY (UPH MAXIMUM)	1,012.6 uph (800 units)	
11 OFFICE (SQM MAXIMUM)	10,920 sqm	
12 RETAIL	2,865sqm	
13 AMENITY	4,490 sqm	
14 RESIDENTIAL	80,790 sqm (800 units)	
15 MECHANICAL	2,740 sqm	
16 UNDERGROUND PARKING	550 spaces	



Tower 1 - Commercial (Level 1-4); Residential (Level 6 - 52); Mechanical (Level 5 & 33)
Tower 2 - Commercial (Level 1-4); Residential (Level 5 - 42); Mechanical (Level 4 & 27)

--- LIMIT OF HERITAGE DESIGNATION
--- EXTENT OF UNDERGROUND PARKING
--- PROPERTY LINE

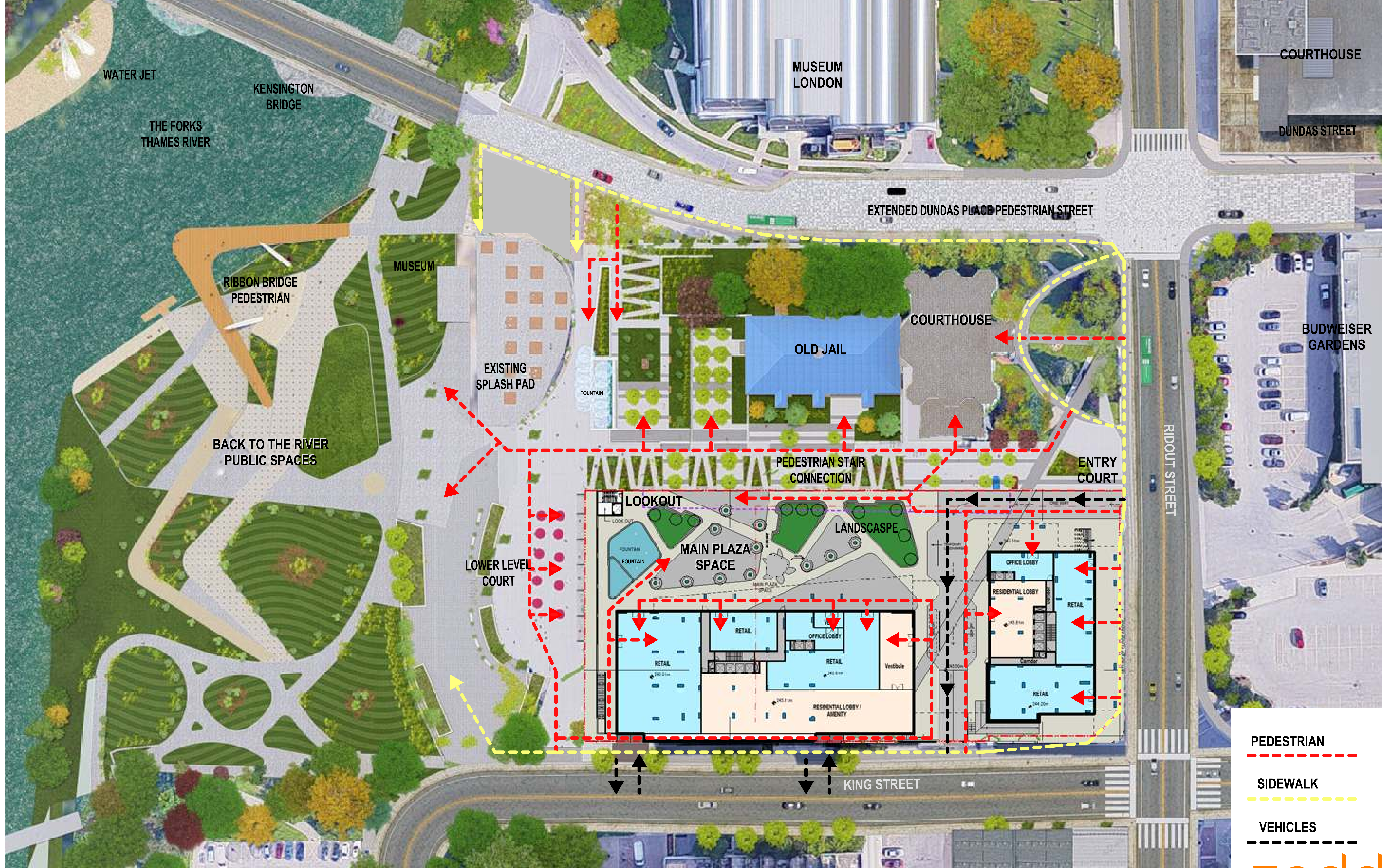
19-045

50 King

Site Plan SCALE : 1"=30'-0"

V6 - 23.05.17
A0.2 C

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- PEDESTRIAN

- SIDEWALK

- VEHICLES

APPENDIX B

ARCHITECTURAL RENDERINGS























19-045

50 King

RENDER - VIEW FROM DUNDAS ST & HIDEOUT ST

V6 - 23.05.17
A6.15

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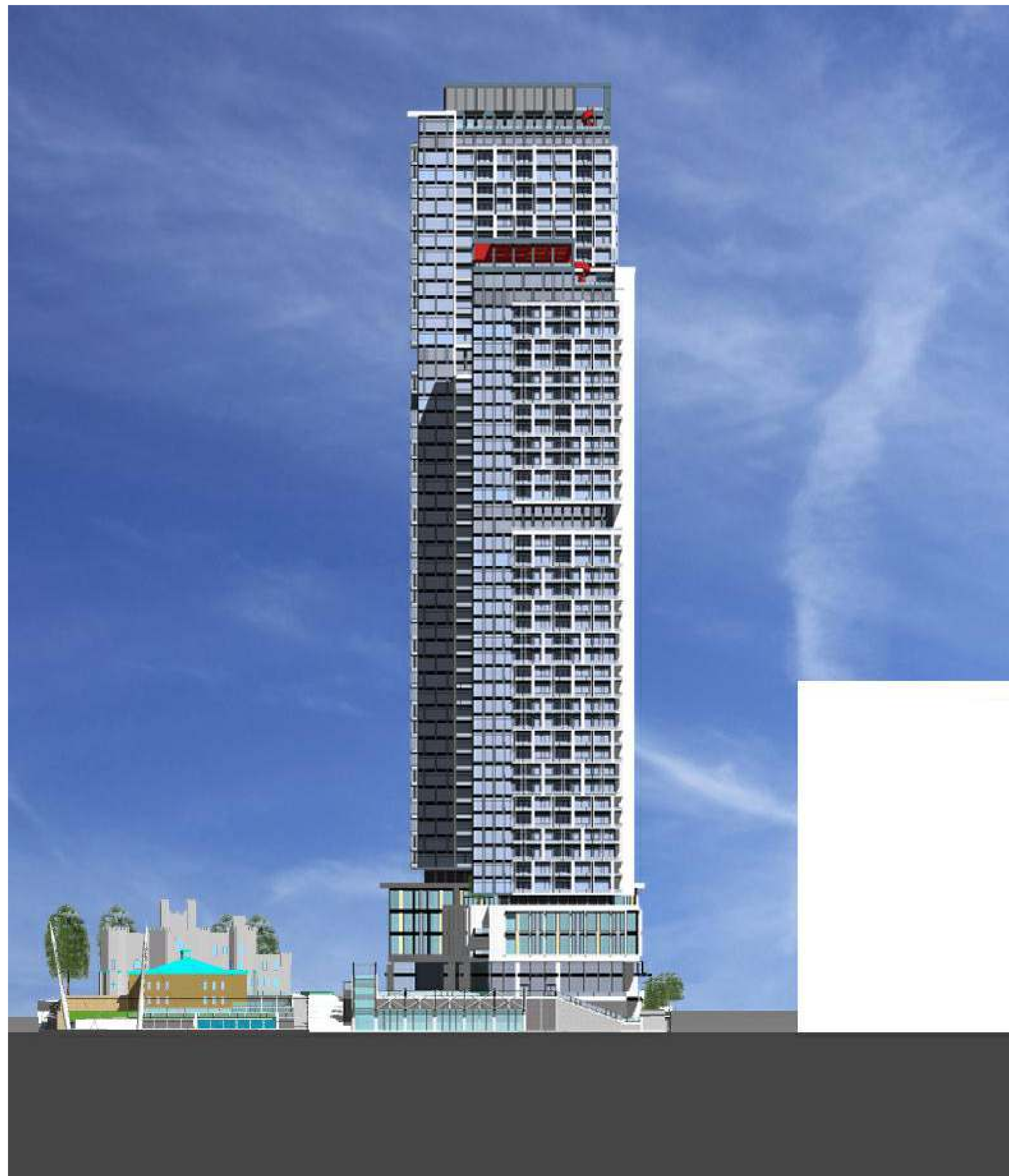
APPENDIX C

ELEVATIONS AND CROSS-SECTIONS

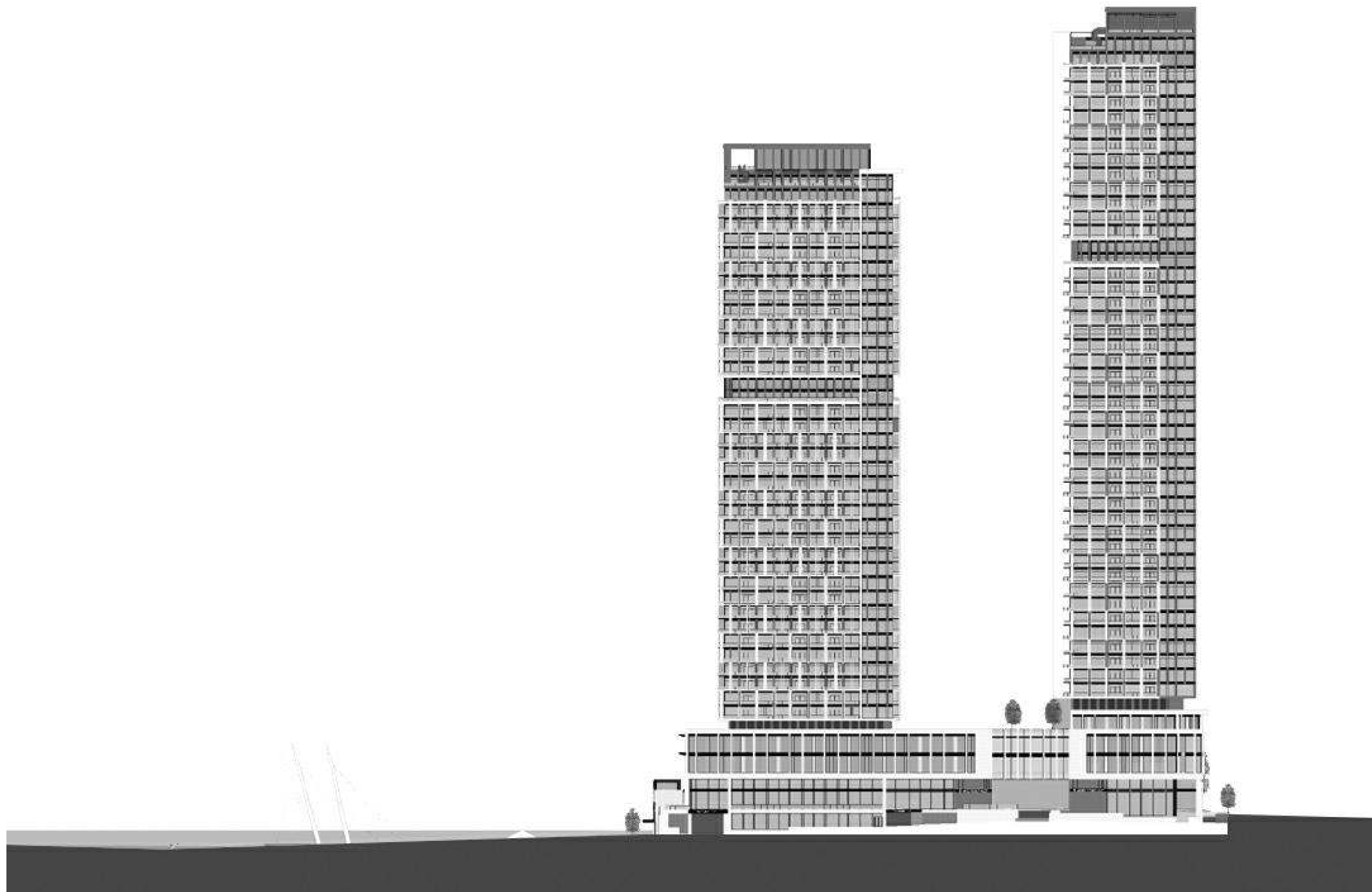


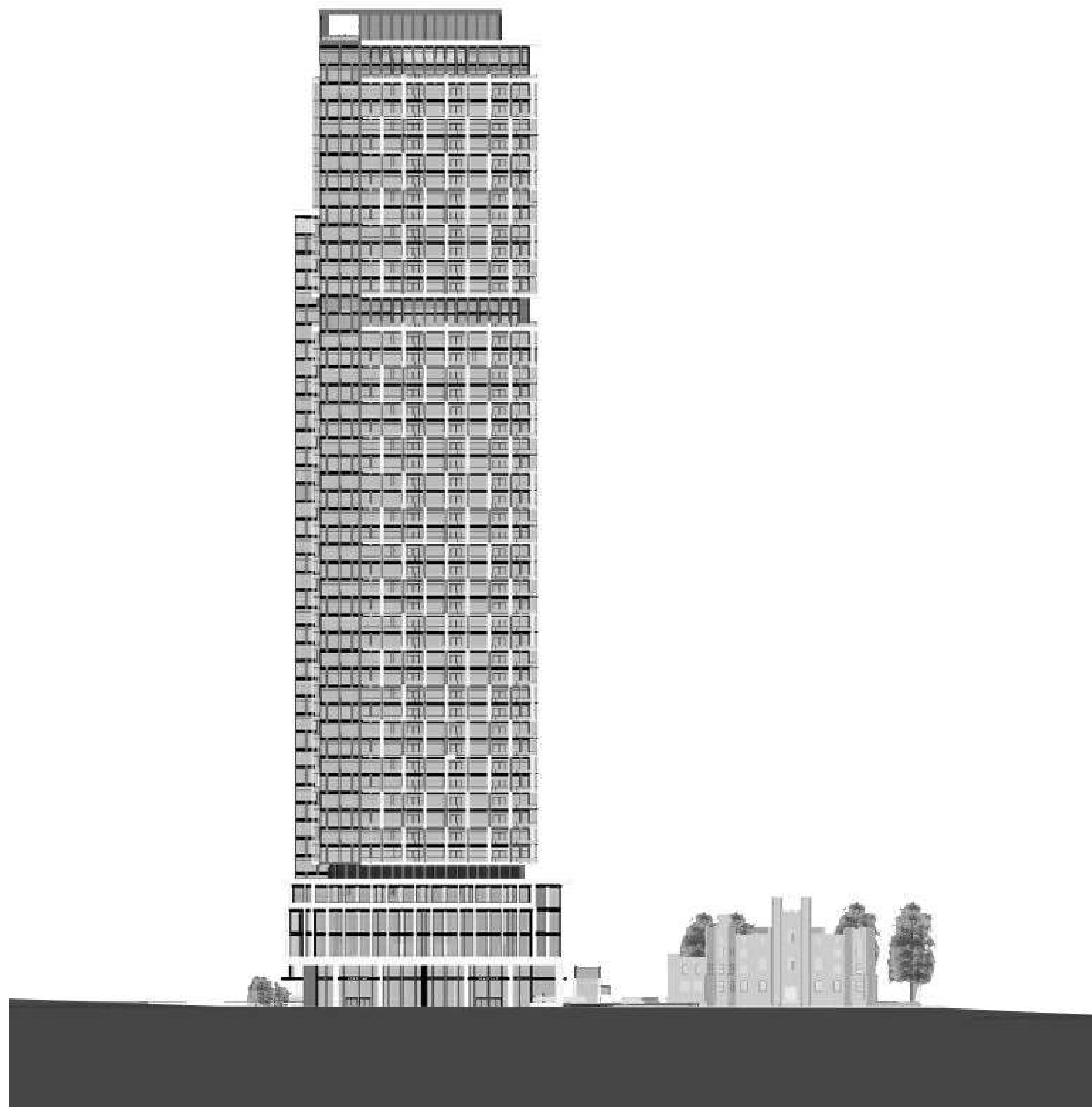














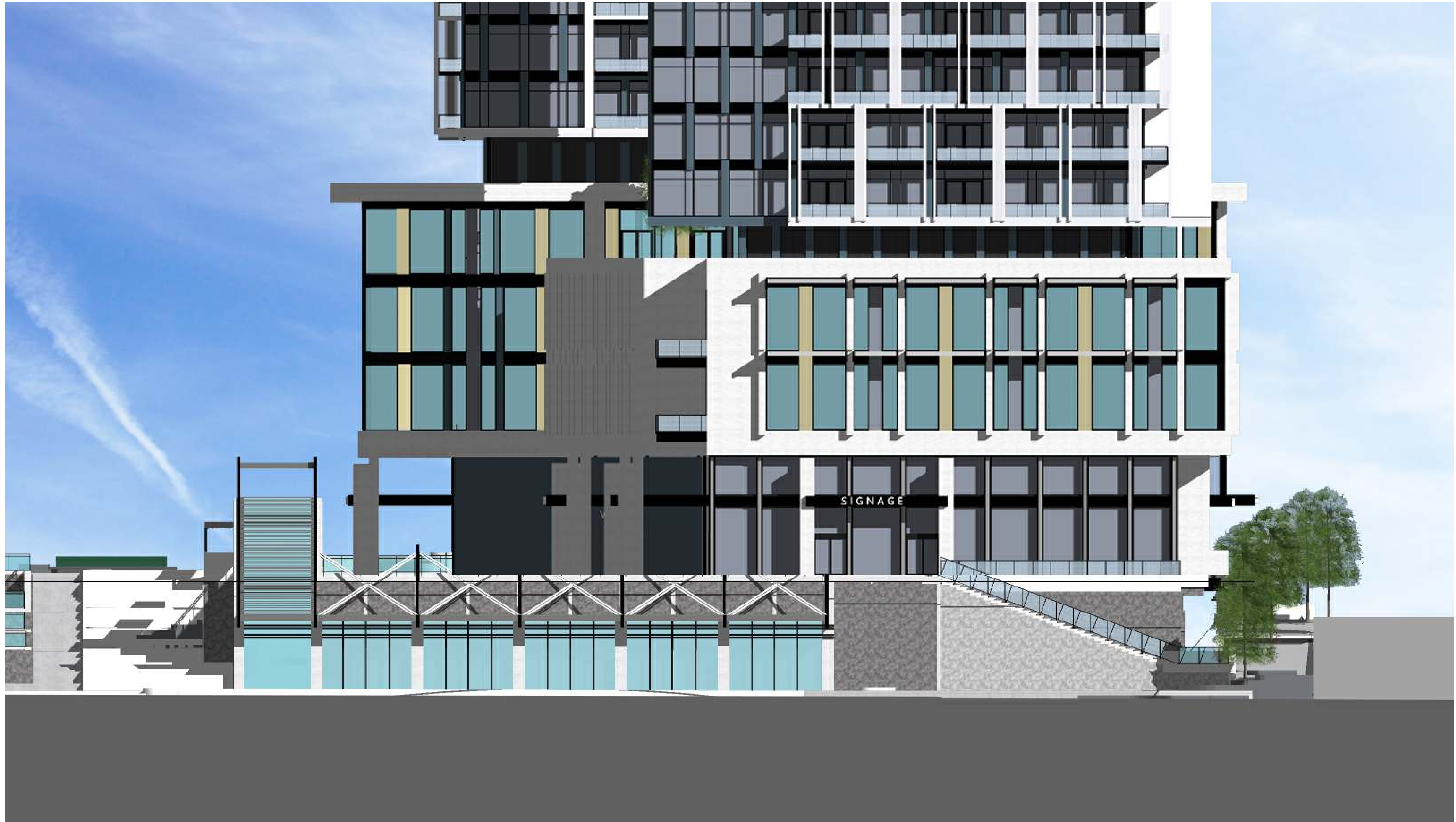
Podium - North Elevation



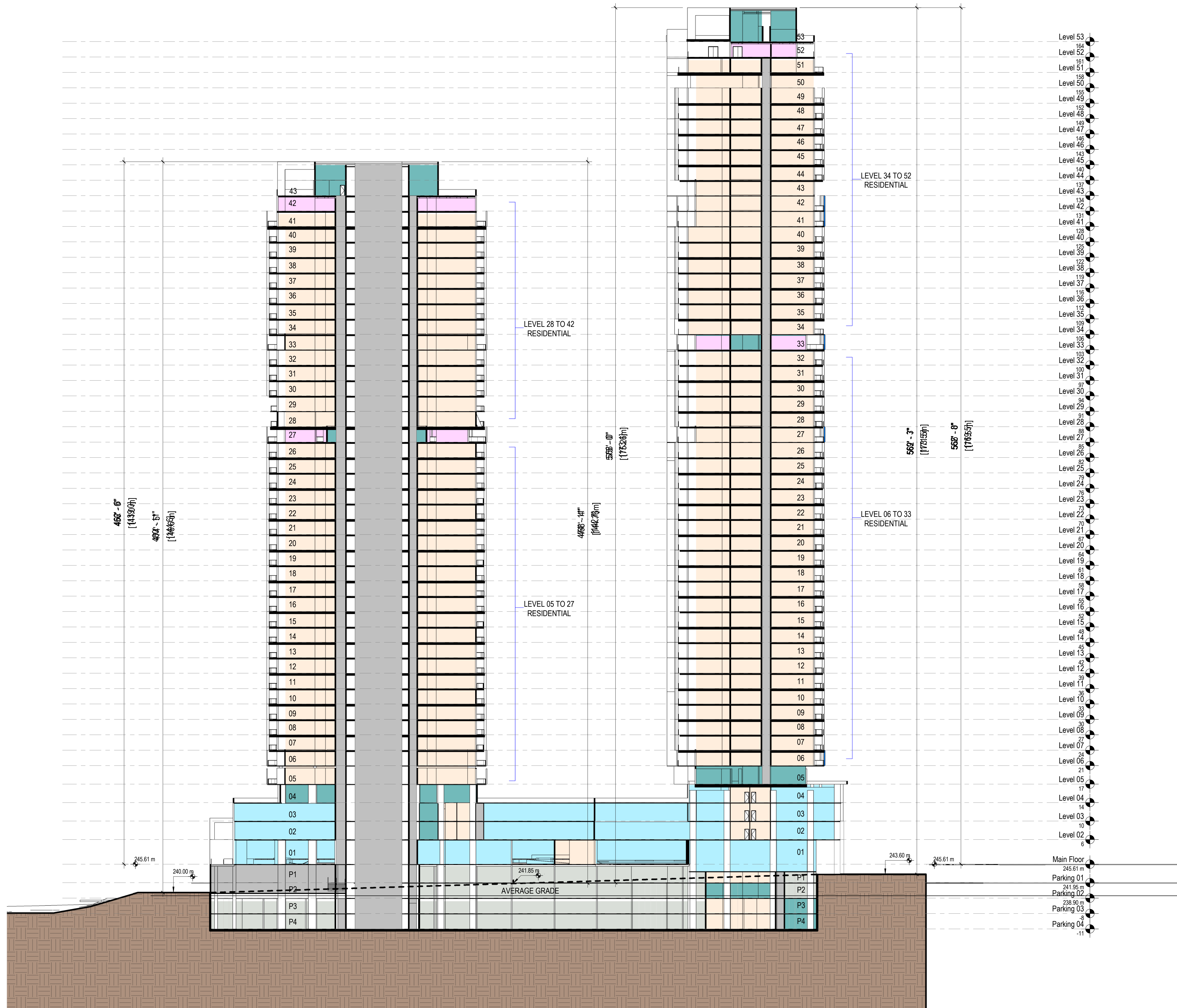
Podium - South Elevation



Podium - East Elevation



Podium - North Elevation



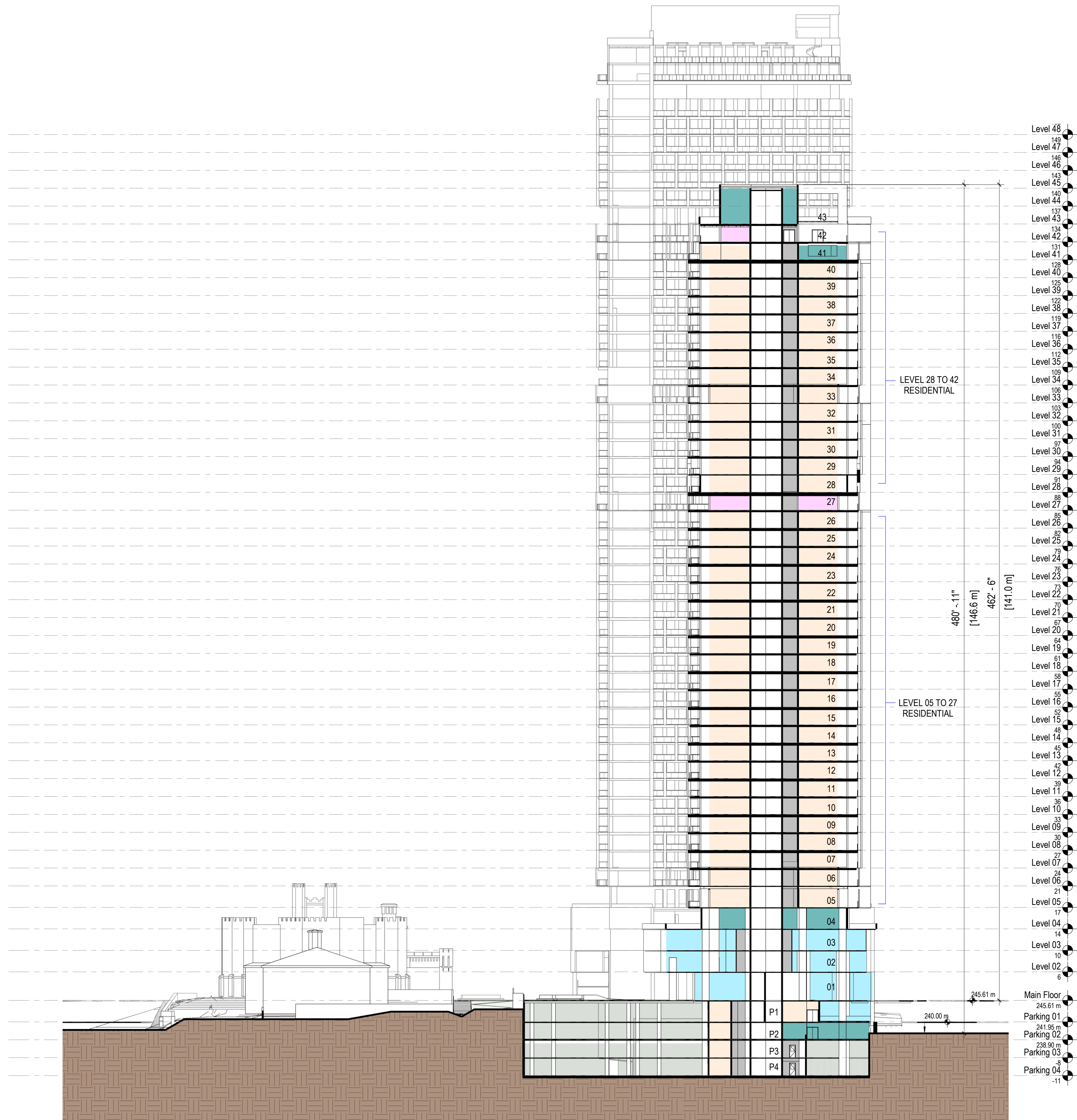
Department Legend

- 2 Bed
- Amenity
- Circulation
- Commercial
- Parking
- Service

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Department Legend

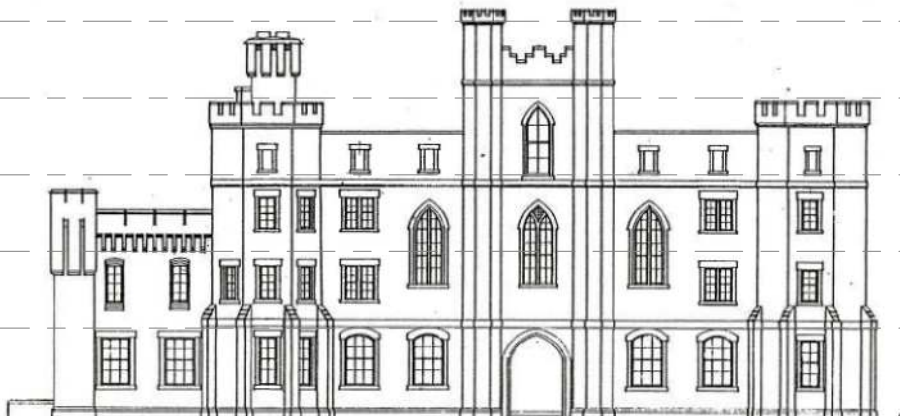
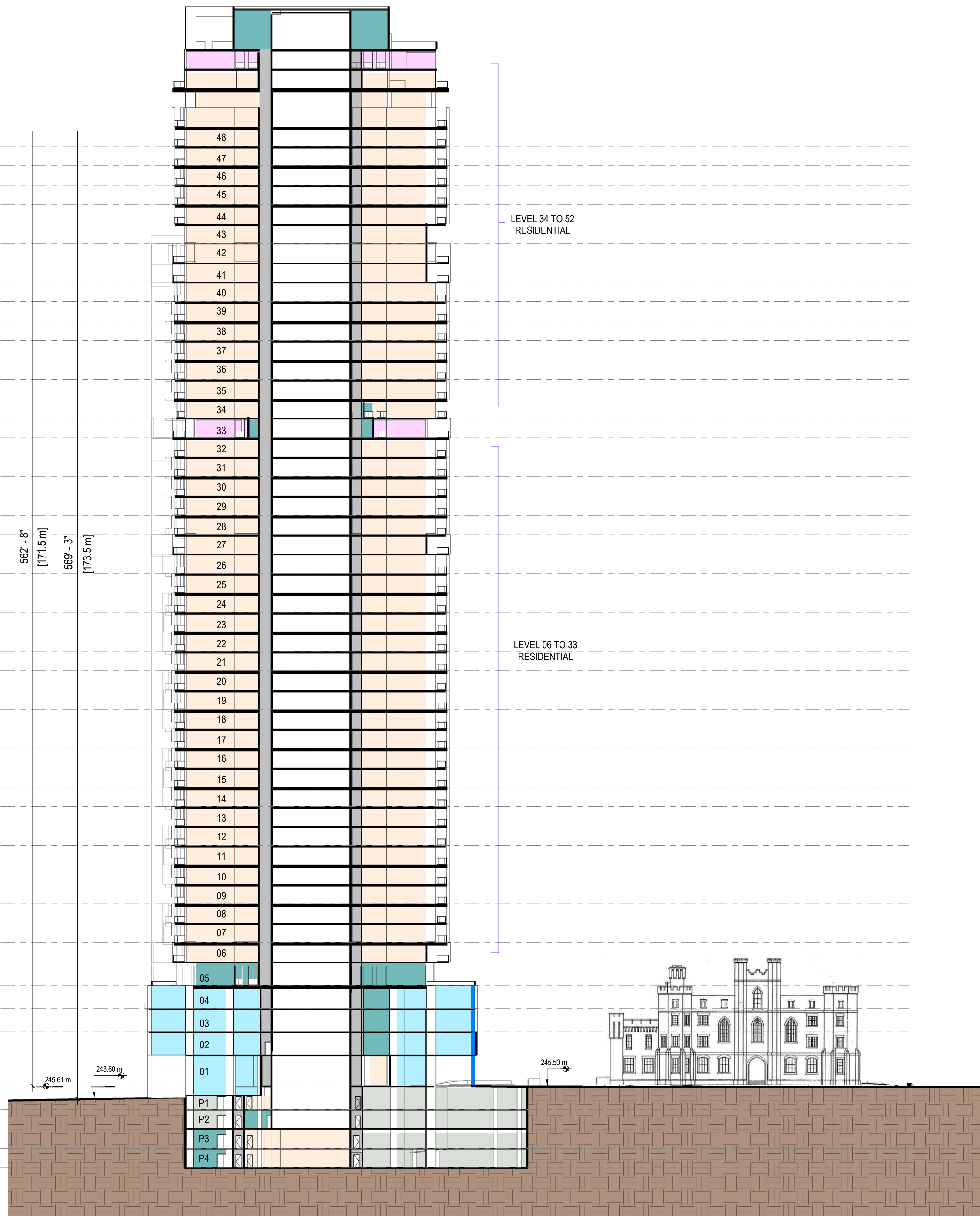
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- Amenity
- Circulation
- Commercial
- Parking
- Service

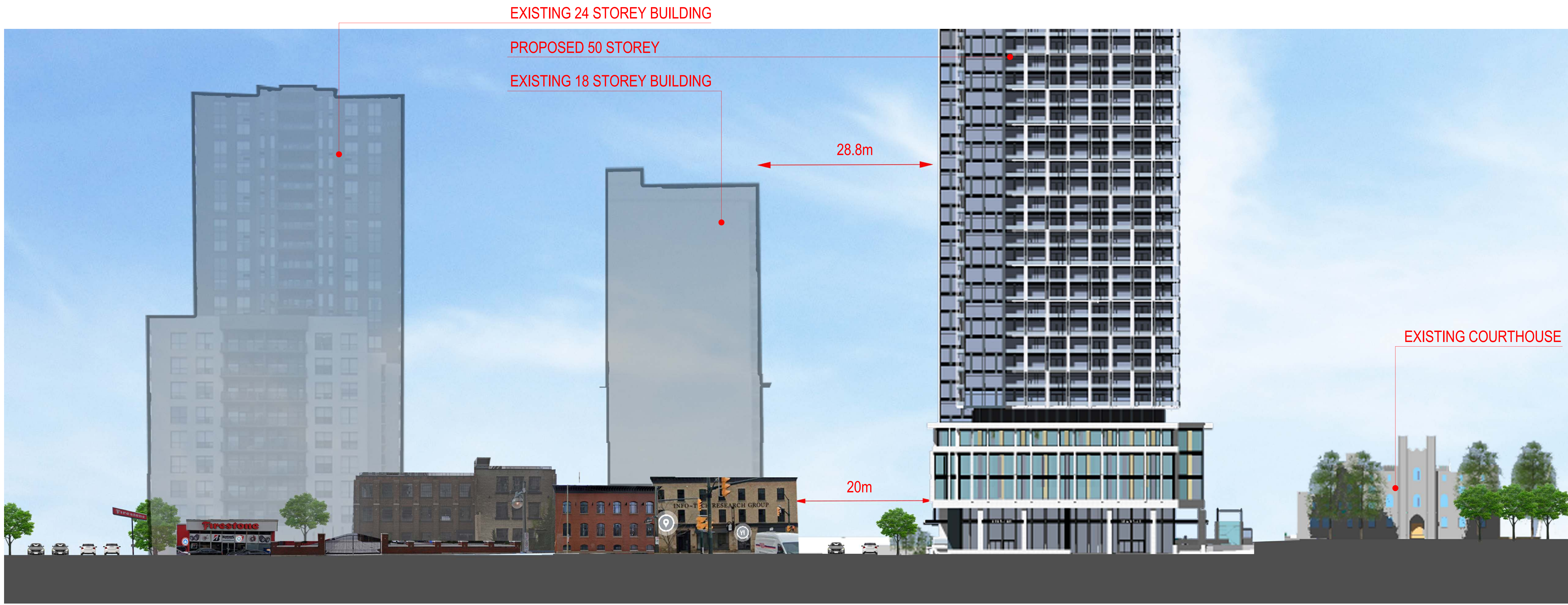
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152 Level 48
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 146 Level 46
 143 Level 45
 140 Level 44
 137 Level 43
 134 Level 42
 131 Level 41
 128 Level 40
 125 Level 39
 122 Level 38
 119 Level 37
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 Parking 02
 238.90 m
 Parking 03
 -8
 Parking 04
 -11

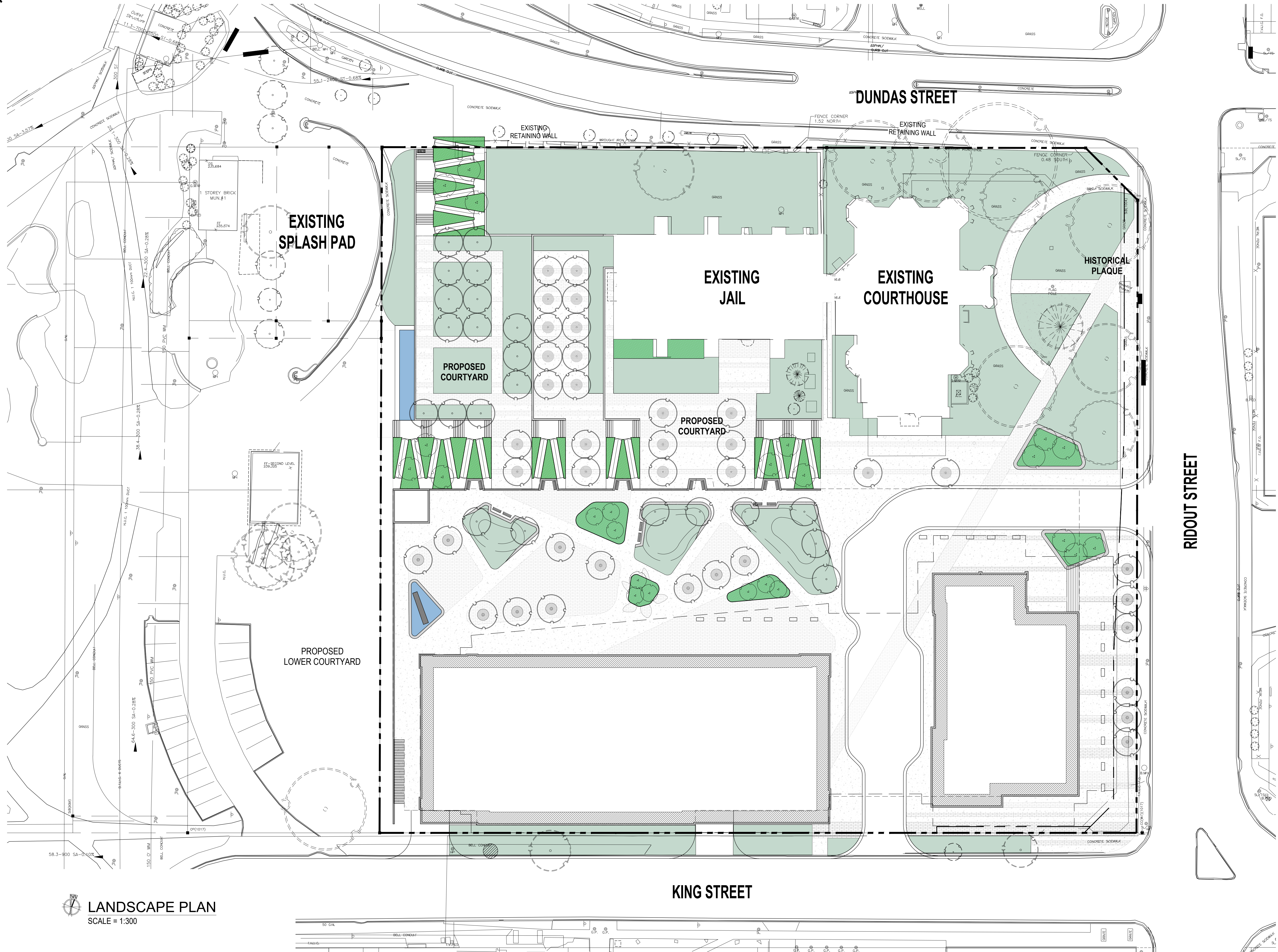




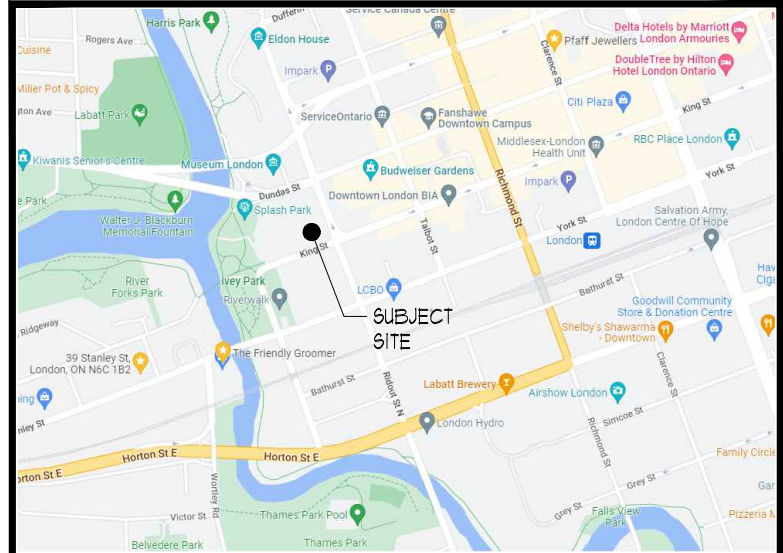
APPENDIX D

CONCEPTUAL LANDSCAPE PLAN

THAMES RIVER



LANDSCAPE PLAN
SCALE = 1:300



KEY MAP



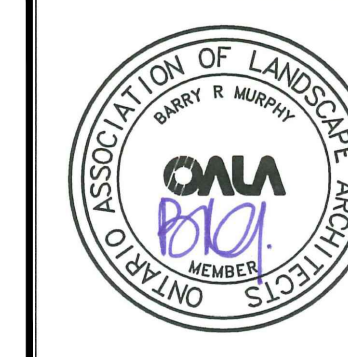
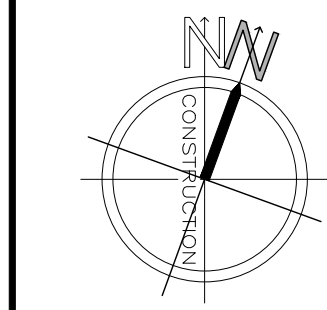
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Barry R. Murphy, O.A.L.A. C.S.L.A. DATE

DATE	DESCRIPTION	No.
APR1323	ISSUED FOR ZBA	1.
MAR2823	ISSUED FOR REVIEW	6.
DEC1222	ISSUED FOR REVIEW	5.
DEC0122	ISSUED FOR REVIEW	4.
DEC0522	ISSUED FOR COORDINATION	3.
NOV302022	ISSUED FOR REVIEW	2.
SEPT282022	ISSUED FOR REVIEW	1.

PLOTTING INFORMATION:
PLOTTED DATE + 2023-04-13
PLOTTED SCALE + 1:1



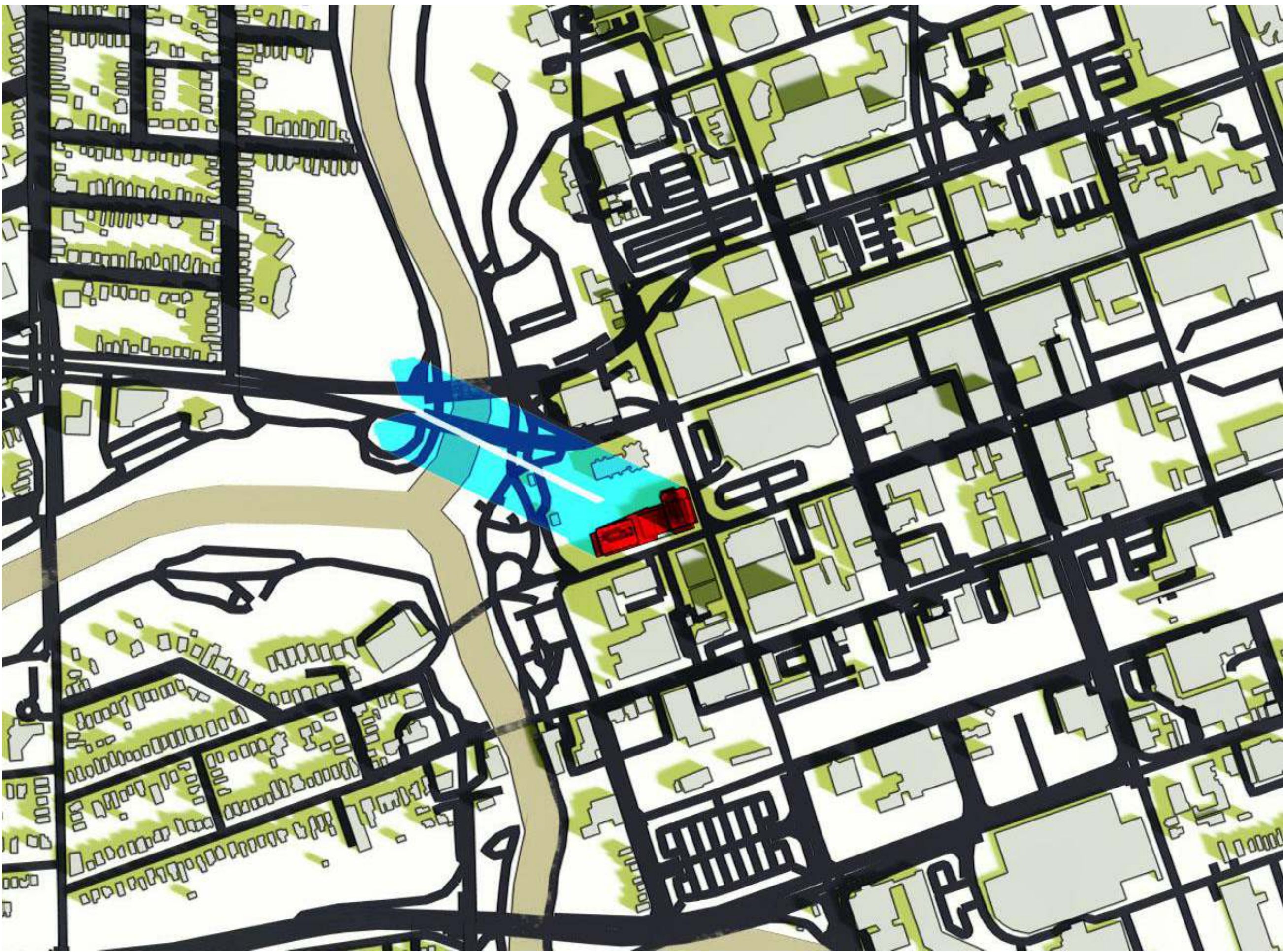
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YORK DEVELOPMENT
50 KING STREET
LONDON, ONTARIO

DRAWING TITLE:
LANDSCAPE PLAN

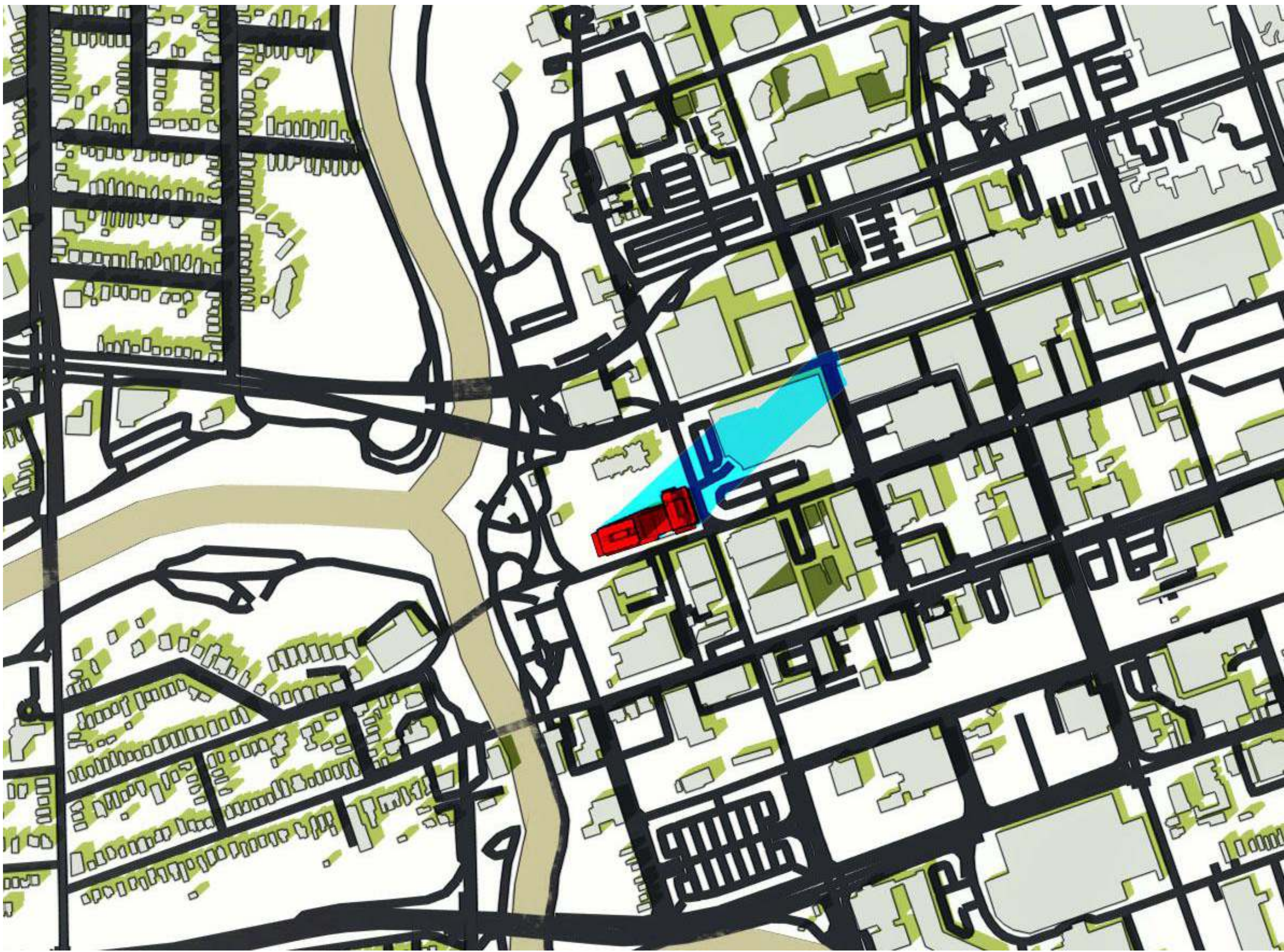
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APPENDIX E

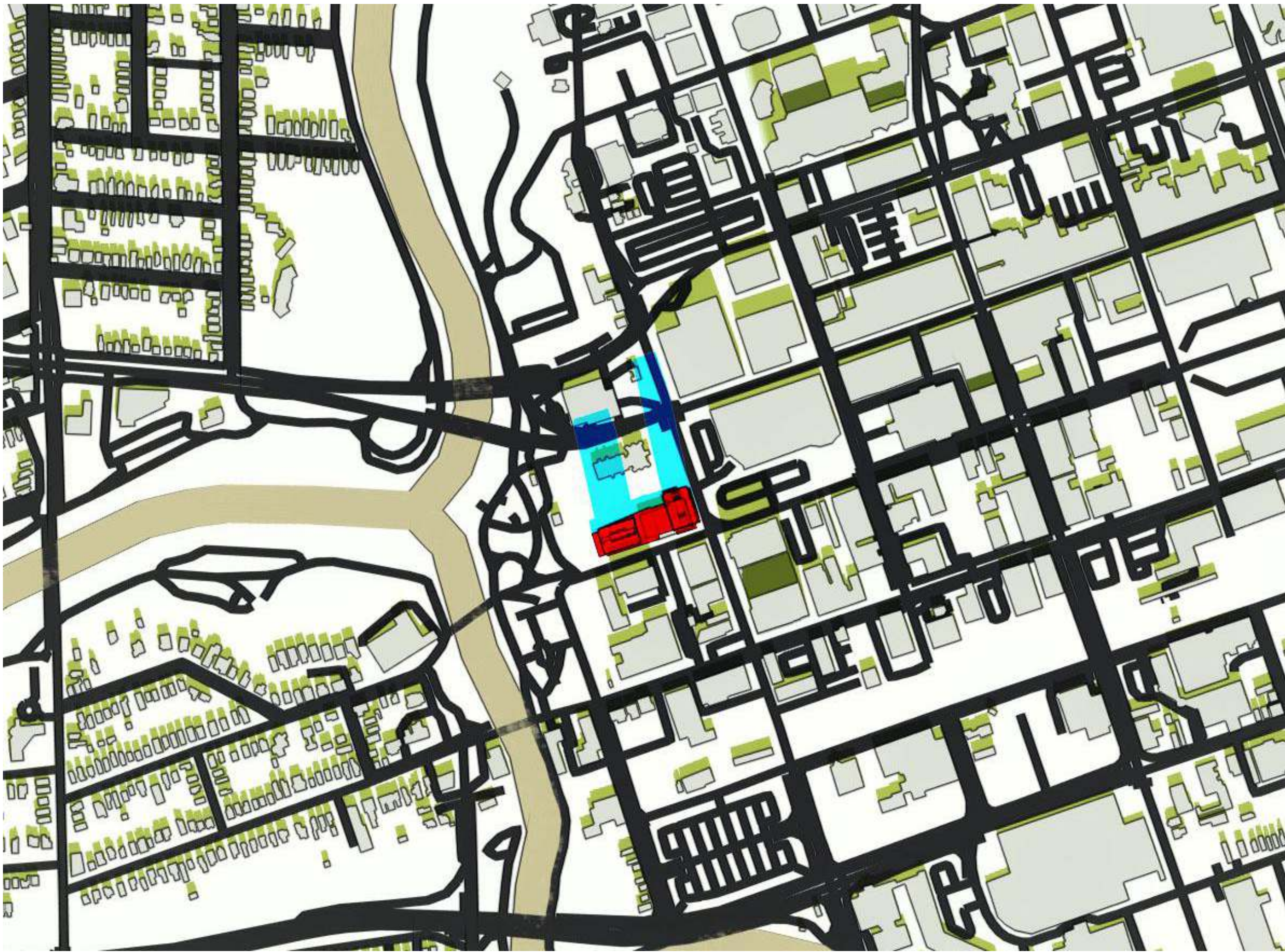
SHADOW STUDY








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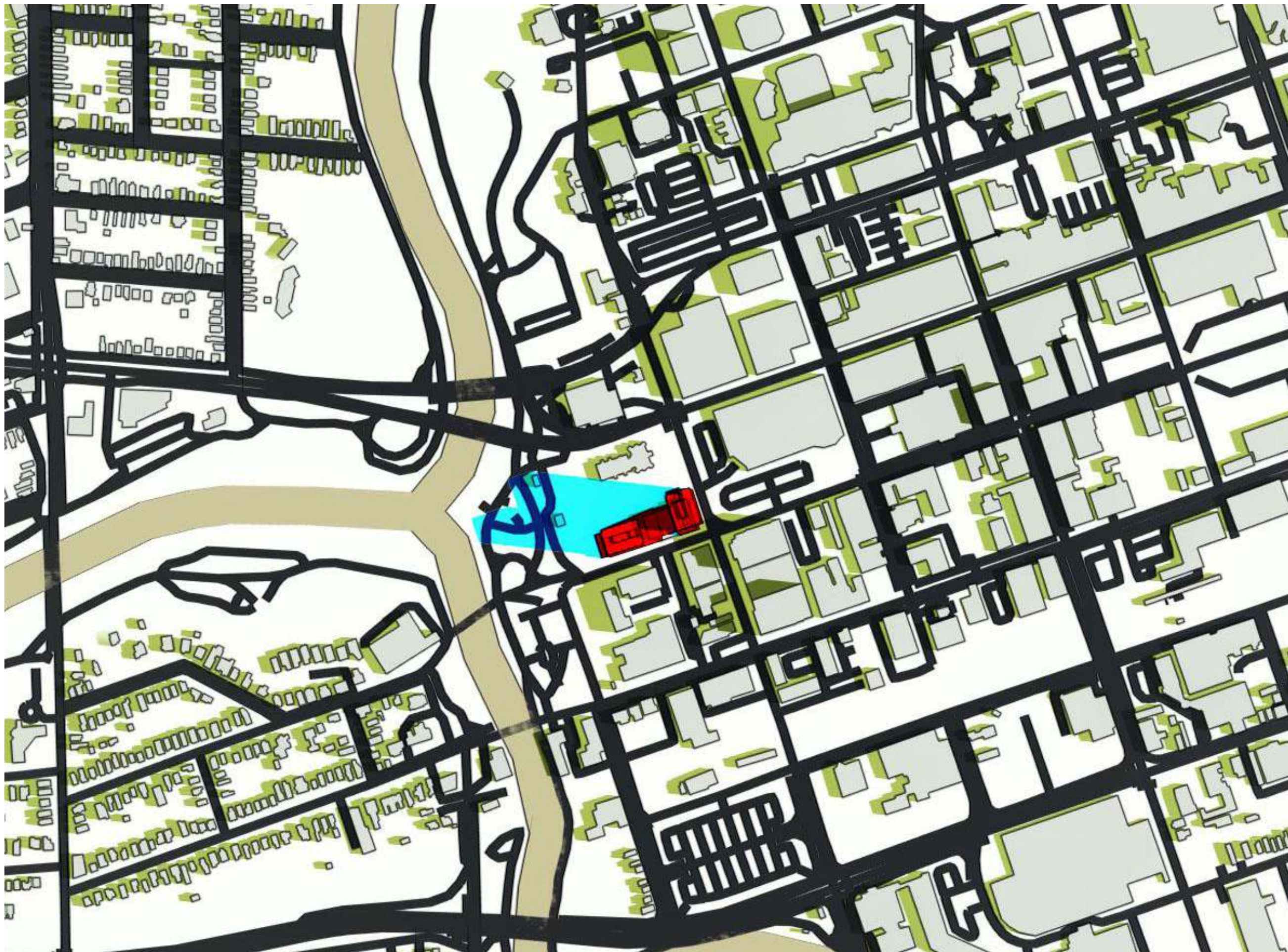


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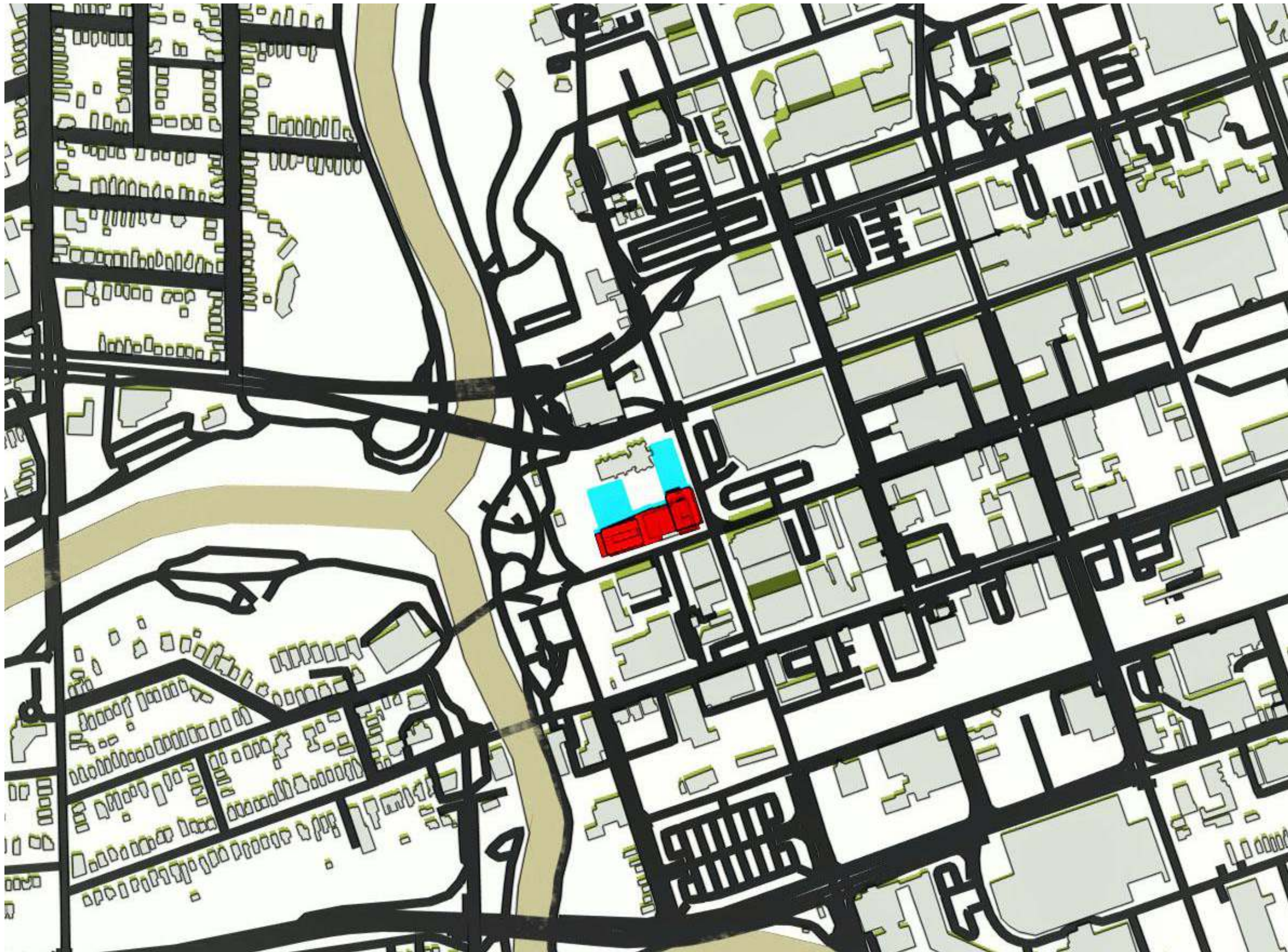


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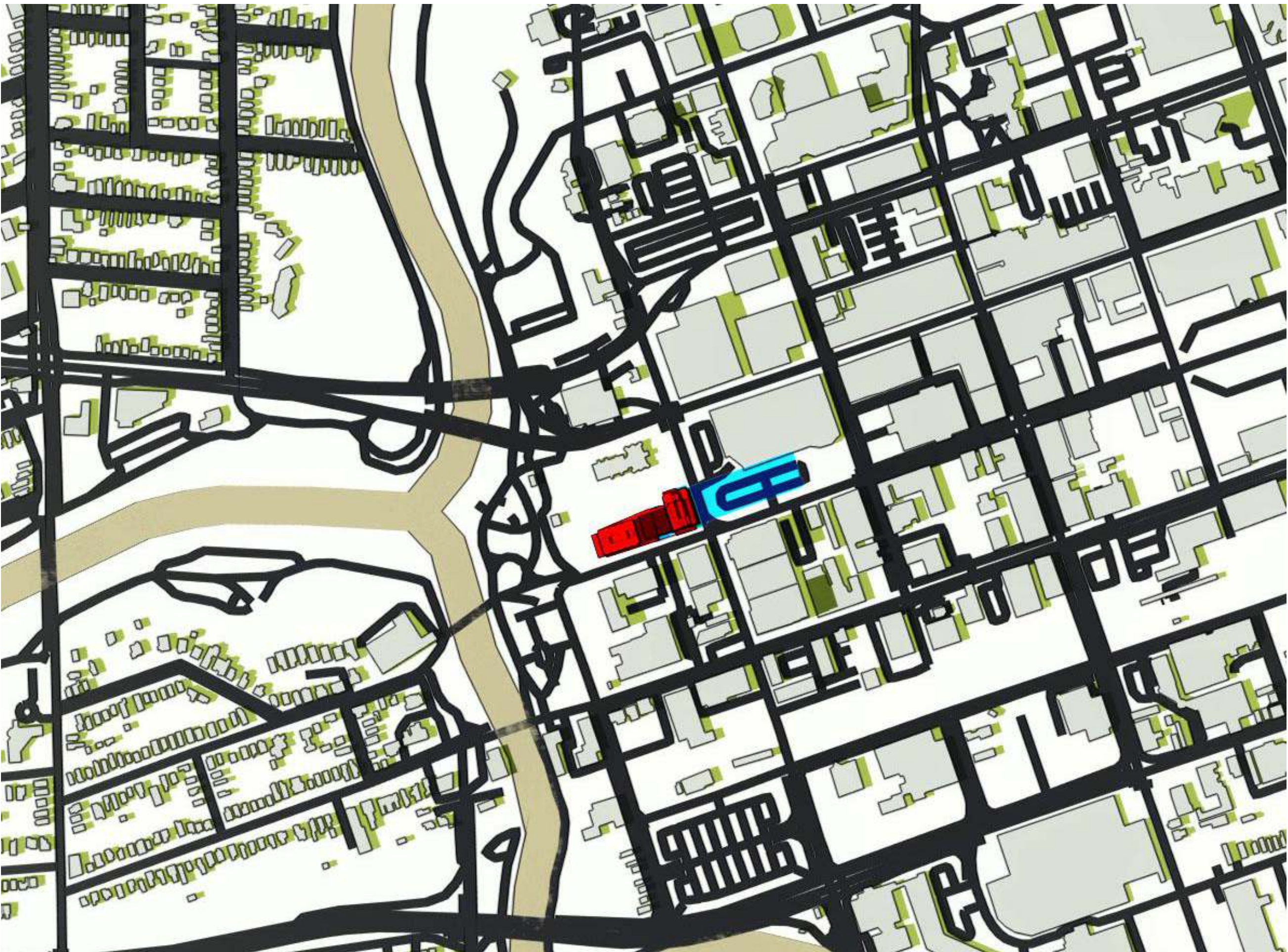
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	PROPOSED BUILDING
	SHADOWS PROJECTED BY PROPOSED BUILDING



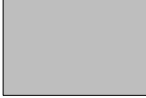



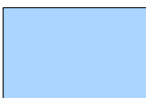
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JUNE 21 1200 PM



JUNE 21 300 PM

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	EXISTING ROADS
	SHADOWS PROJECTED BY EXISTING BUILDINGS
	PROPOSED BUILDING
	SHADOWS PROJECTED BY PROPOSED BUILDING








DECEMBER 21 900 AM



DECEMBER 21 300 PM



DECEMBER 21 1200 PM

LEGEND	
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	EXISTING ROADS
	SHADOWS PROJECTED BY EXISTING BUILDINGS
	PROPOSED BUILDING
	SHADOWS PROJECTED BY PROPOSED BUILDING

