

PLANNING AND DESIGN **REPORT**

OFFICIAL PLAN AMENDMENT AND
ZONING BY-LAW APPLICATIONS

530 Oxford Street West
Captain Generation Mall
City of London

Date:

March 2023 (revised February 2024)

Prepared for:

York Developments

Prepared by:

MacNaughton Hermsen Britton Clarkson Planning Limited (MHBC)

540 Bingemans Centre Drive, Suite 200

Kitchener ON N2B 3X9

T: 519 576 3650 x 800

F: 519 576 0121

MHBC File: 1094'Y'

Table of Contents

1.0	Introduction	1
1.1	Overview	1
1.2	Report Framework	3
1.3	Planning Applications	3
2.0	Site Location & Surrounding Land Uses	5
2.1	Site Description	5
2.2	Project Phasing	5
2.3	Surrounding Land Uses	5
2.4	Spatial Analyses	7
2.4.1	Regional Spatial Analysis	7
2.4.2	Local Analysis	8
3.0	Description of Proposal	9
3.1	Design Goals and Objectives	9
3.2	Concept Plan	10
3.3	Design Considerations	11
4.0	Planning Analysis	14
4.1	Provincial Policy Statement	14
4.2	City of London Official Plan (The London Plan)	21
4.2.1	Status	21
4.2.2	Place Type (Map 1)	22
4.2.3	Policy Overview	22
4.2.4	Our Strategy	22
4.2.5	Our City	25
4.2.5.1	Overview	25
4.2.5.2	Built-Area Boundary/Primary Transit Area	25
4.2.5.3	Transit Village and Rapid Transit Corridors	27
4.2.6	City Design	28
4.2.7	Transit Village Place Type	31
4.2.8	Protected Major Transit Station Areas	33

4.2.9	Impact Mitigation	35
4.2.10	Our Tools	36
4.2.10.1	Guideline Documents.....	36
4.2.10.2	Evaluation Criteria.....	37
4.2.11	Specific Area Policies.....	37
4.2.12	Community Consultation Strategy.....	39
4.2.13	Summary	39
5.0	City of London Zoning By-law Z.-1	40
5.1	Existing Zoning	40
5.2	Proposed Zoning.....	40
6.0	Conclusions	42

List of Tables

Table 1.0:	Required Planning Applications.....	3
Table 2.0:	Surrounding Land Uses	7
Table 3.0:	Consistency with Provincial Policy Statement.....	14

List of Figures

Figure 1:	Location Map.....	Following 5
Figure 2:	Spatial Analysis: 400-800 m	Following 7
Figure 3:	Local Analysis: Site-Specific	Following 8
Figure 4:	The London Plan: Place Types	Following 22
Figure 5:	Existing Zoning.....	Following 40
Figure 6:	Proposed Zoning.....	Following 41

List of Appendices

Appendix A:	Site Plan; Master Plan/Connectivity Plan; Landscape Plan
Appendix B:	Floor Plans (Towers A and B)
Appendix C:	Architectural Perspectives and Renderings
Appendix D:	Building Elevations/Section Drawings
Appendix E:	Shadow Study
Appendix F:	Zoning Data Sheet

1.0 Introduction

1.1 Overview

MHBC has been retained by Captain Generation Mall Limited to assist with an application to amend the City of London's Official Plan (The London Plan) and Zoning By-law No. Z.-1 in support of a mixed-use development proposal for lands addressed as 530 Oxford Street West (known locally as the 'London Mall'). The London Mall site measures approximately 5.2 ha in area and is located at the southeast corner of the Oxford Street West/Wonderland Road North intersection. The subject property is situated within the City's Primary Transit Area and forms part of the West London planning district.

Captain Generation Mall Limited (Captain Generation Mall) is submitting Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) applications to permit a high-rise tower development within the subject lands (the 'Site'). In support of this proposal, matter architectural studio inc. (matter) has prepared a conceptual design illustrating the intended site layout and high-rise building forms. The following represent core project objectives that helped to guide the proposed design:

- Integrate high density residential units and complementary commercial uses into an existing shopping centre to (1) function cohesively within the project site and (2) support the diversification, intensification and long-term vitality of Wonderland Road North/Oxford Street West (Wonderland/Oxford) development node;
- Design high-rise forms that will create a prominent visual presence and will be compatible with the surrounding development context;
- Align the design layout with the applicable planning policy framework and related planning initiatives; and
- Promote a compact, efficient development to help broaden housing choice within the West London community.

In summary, Captain Generation Mall is proposing to intensify the existing commercial development on the Site with the addition of two, 33 storey high-rise towers. The proposed towers would accommodate approximately 408 dwelling units contained within a range of apartment configurations to respond to market demand. Main floor commercial space is also planned for both towers, with pedestrian entrances provided from the adjacent public sidewalk system and the ground (mall) level. A mix of common

indoor/outdoor amenity space, storage areas and structured parking would also be provided within these tower forms.

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

- The subject lands are located within the Urban Growth Boundary and Primary Transit Area of the City of London, form part of the City's West London planning district, are situated within an established development node and are designated for commercial and residential purposes. The property is also located within a Protected Major Transit Station Area pursuant to The London Plan;
- The Site is well suited for intensive residential forms, given its physical characteristics, its location within a prominent development node, and its proximity to the arterial road network, public transit, active transportation routes, offices, schools, parks and residential neighbourhoods. Further, introducing high-rise apartment buildings within the London Mall site would support the diversification, intensification and overall vitality of the Wonderland/Oxford node;
- 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 and to promote compact, efficient development. Additionally, the contemporary, high-rise tower design is intended to limit shadow impacts and to minimize obstruction of views proximate to the Site;
- Design components integrated into the proposal would contribute positively to the local streetscape and the City's skyline. Additionally, the podium elements of these buildings have been designed to help enhance the pedestrian environment along the both the Oxford Street West and Wonderland Road North corridors;
- The apartment unit configurations planned for the upper floors of the towers would broaden housing choice within the West London community. These additional units would also help to promote neighbourhood stability by diversifying the mix of housing available in the community (to better meet the changing needs of local residents over the long-term);
- Assessments carried out for the project generally conclude that the City's servicing infrastructure and road network can accommodate the proposed development (with consideration for study recommendations); and
- In our opinion, this intensification 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.

1.2 Report Framework

This Planning and Design Report has been prepared for submission to the City of London in support of the aforementioned OPA and ZBA applications and 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 No. Z.-1; and
- City of London Placemaking Guidelines.

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 (The London Plan) to permit high-rise towers having a maximum height of 33 storeys in the context of the Transit Village place type.	City of London
Zoning By-law Amendment to permit high-rise towers having a maximum height of 115 m and a maximum residential density of 150 units/ha within the Community Shopping Area (CSA4) Zone regime.	City of London
Site Plan Approval (future application)	City of London

A Pre-Application Consultation meeting was held with City of London staff on March 29, 2023 to review the submission requirements for the development concept. As set out in the Revised Record of Pre-Application Consultation issued by the City for this proposal, the following plans and reports have been prepared in support of the project and are enclosed with the planning applications:

- Planning and Design Report;
- Tree Assessment Report;
- Transportation Impact Assessment;
- Sanitary Servicing Analysis;
- Water Servicing Brief; and
- Stormwater Management Brief.

2.0

Site Location & Surrounding Land Uses

2.1 Site Description

The London Mall site is located adjacent to the southeast corner of the Oxford Street West/Wonderland Road North intersection, and fronts both of these road corridors. This property, which is irregular in shape, measures approximately 5.2 in area, has approximately 157 m of frontage along Oxford Street West and approximately 193 m of flankage along Wonderland Road North, and has a maximum depth of approximately 246 m measured from Oxford Street West (all measurements herein are approximations).

Currently, the developed portion of the Site measures 4.5 ha and contains a main shopping centre, three multiple-unit commercial buildings fronting Oxford Street West, a large surface parking field, vehicular accesses to both Oxford Street West and Wonderland Road North, pedestrian connections and landscaping features. Collectively, the mall building and the external units contain a number of service/retail commercial uses. The eastern portion of the Site includes open space associated with the East Branch of Mud Creek.

Figure 1 of this Report illustrates the general location of the Site.

2.2 Project Phasing

This development proposal pertains to a portion of the subject property generally located adjacent to the Oxford Street West/Wonderland Road North intersection and the aforementioned multiple-unit buildings. In total, the existing mall building and multiple-unit buildings have a combined gross floor area (GFA) of 14,092 m².

The OPA and ZBA applications are intended to facilitate the further intensification of the London Mall. In conjunction with project planning, matter has developed a design concept envisioning how the various project phases and the existing mall would ultimately be integrate into a cohesive, mixed-use development.

2.3 Surrounding Land Uses

The subject lands are located entirely within the City of London's Urban Growth Boundary and form part of the West London planning district. Further, the Site is located within an established commercial node containing a mix of large format and/or smaller retail plazas within all quadrants of the Wonderland Road North/Oxford Street West intersection. The

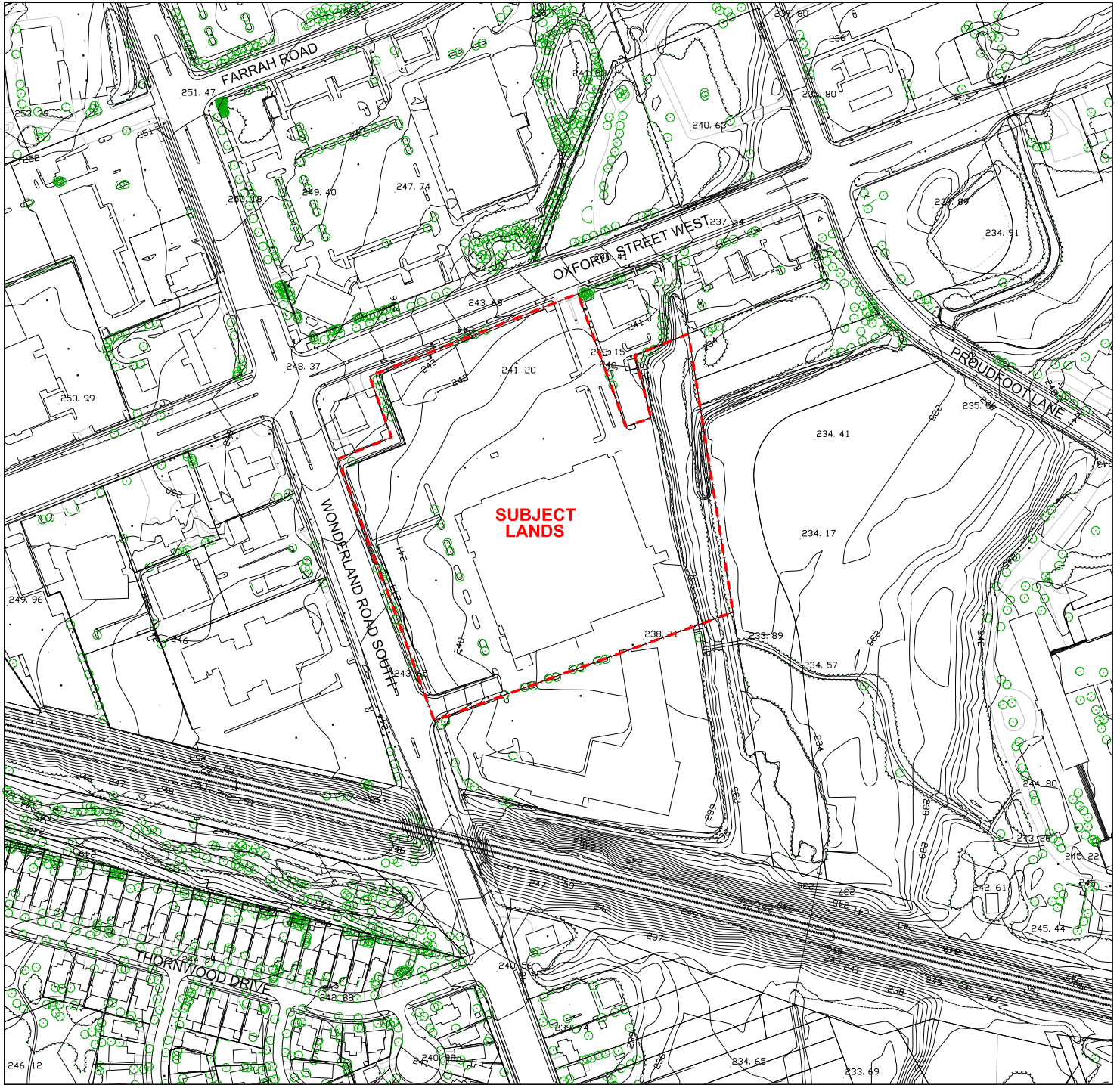
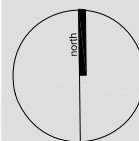


Figure 1
Location Map

 SUBJECT LANDS



surrounding commercial/retail uses are primarily auto-oriented uses with large surface parking areas. Generally, surrounding these commercial lands is a mix of low, medium and high density residential neighbourhoods and open spaces areas.

The following images illustrate several London Mall features from the adjacent street frontages. As illustrated, the mall parking lot grade is lower than the adjacent road grades, which, in effect, establishes both mall level and street-level building frontages within the Site.

Subject Lands: View south from Oxford Street West frontage



Source: Google Maps, July 2023

Subject Lands: View east from Wonderland Road North frontage



Source: Google Maps, July 2023

Adjacent to the Site, both Oxford Street West and Wonderland Road North incorporate four through traffic lanes, turning lanes and sidewalks. Bike lanes are also provided on Wonderland Road North adjacent to the Site, with bike paths located adjacent to Wonderland Road North, further north of the Site, and along Oxford Street West, further west of the Site.

With respect to street classification, Map 3 (Street Classifications) of The London Plan classifies the adjacent section of Oxford Street West as a Rapid Transit Boulevard, while the adjacent section of Wonderland Road North is classified as a Main Street. Policy 371 of this Official Plan identifies that Rapid Transit Boulevards are planned to prioritize through movement and connections with transit vehicles. These street types are also intended to support the movement of high volumes of traffic (pedestrian, cycle and vehicular), and are to integrate a high standard of urban design. This Policy also states that Main Streets are intended to prioritize pedestrians, and to move medium to high volumes of traffic.

Further, Policy 371 prescribes that Main Streets are to integrate a high standard of urban design.

Additionally, the Site is located within convenient walking distance of London Transit bus stops, with transit service provided along both Oxford Street West and Wonderland Road North. Map 3 also identifies that a Rapid Transit Station is to be located at this intersection of these streets

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

Table 2.0 – Surrounding Land Uses

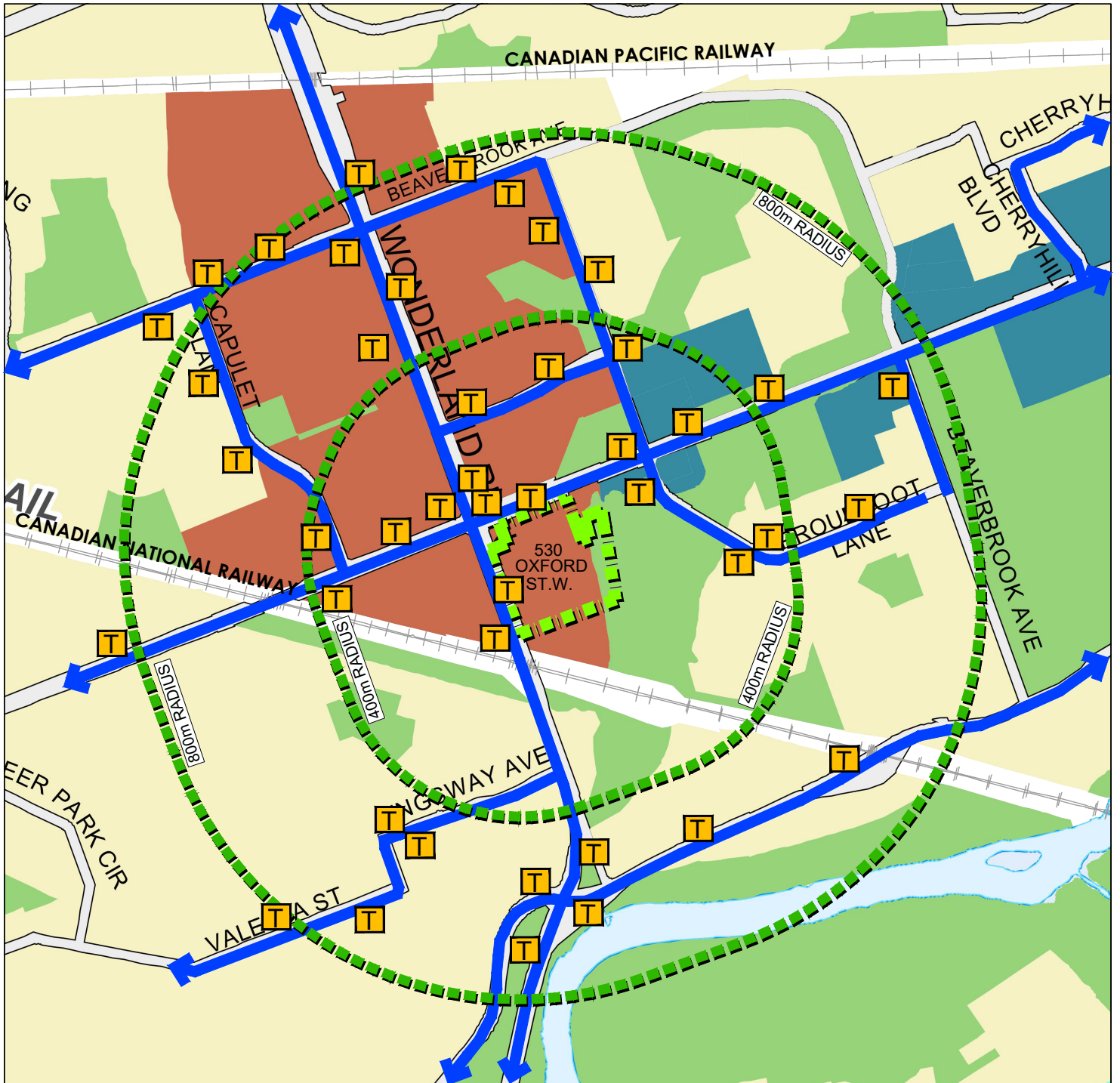
Relative Location	Existing Land Uses
TO THE NORTH:	Retail use; Oxford Street West corridor; service/retail commercial uses
TO THE EAST:	Service/retail commercial uses; open space; high density residential development
TO THE SOUTH:	Service/retail commercial uses; railway corridor; open space
TO THE WEST:	Wonderland Road North corridor; commercial uses

2.4 Spatial Analyses

2.4.1 Regional Spatial Analysis

A Regional Spatial Analysis was conducted for the Site at a 400 metre radius and an 800 metre radius (refer to **Figure 2** of this Report).

The 400 metre radius identifies a number of land uses in the vicinity of the Site. Referencing the 1989 Official Plan, to the immediate north, east and west are commercial activities associated with the Transit Village place type. These areas are developed for a variety of service/retail commercial uses. Lands designated Green Space are located to the northeast, east and south. Generally, these areas contain features associated with the Mud Creek Subwatershed including the East Branch of Mud Creek located along the eastern perimeter of the Site. Further to the northeast and northwest there are Transit Village-designated lands containing a number of high-rise apartment buildings. To the southwest are lands in the Neighbourhoods place type containing an established low density residential subdivision. London Transit bus service is available along the Oxford Street West and Wonderland Road North corridors, with stops located in close proximity to the Site. Notably, stops for Route 91 (Express: Fanshawe College – Oxford & Wonderland) are located within convenient walking distance of the Site and provide direct, limited-stop access to key destinations along the Oxford Street corridor, including Fanshawe College. Further, there is a community trail at the southeast corner of the Site linking to the nearby high-rise apartment development located southeast of the property.

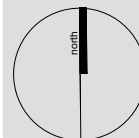


LEGEND

- GREEN SPACE
- TRANSIT VILLAGE
- RAPID TRANSIT CORRIDOR
- NEIGHBOURHOODS
- TRANSIT ROUTE
- T TRANSIT STOP

Figure 2
Spatial Analysis
400-800m

SUBJECT LANDS

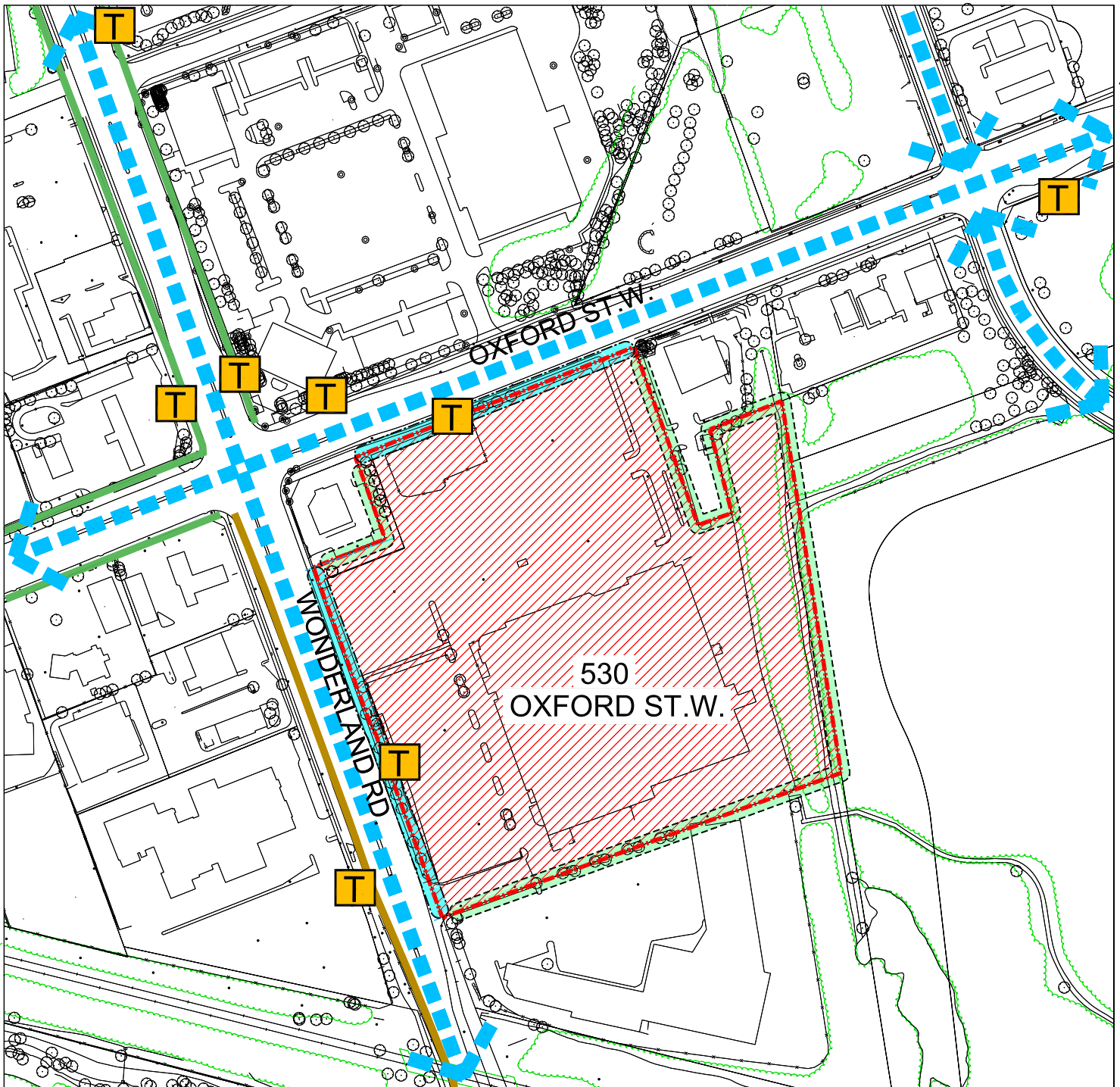


Within the 800 metre radius, the land uses identified above are generally surrounded by lands containing low density residential development to the southwest, open space to the northeast, east and south, and mid- and/or high-rise residential forms are located on lands designated Transit Village to the northeast and northwest. Additional London Transit bus service is also available within this radius.




2.4.2 Local Analysis

A Local Analysis was conducted to understand the Site's relationship with the surrounding uses in the immediate area (refer to **Figure 3** of this Report). The key findings of the analysis are summarized below:

- Active frontage zones has been identified along the Wonderland Road North and Oxford Street West frontages. Appropriate pedestrian connections, extensive glazing, and an enhanced façade building would be provided along these frontages to help activate these streetscapes;
- Zones of sensitivity has been identified where the subject lands interface with the retail use located at the Oxford Street West/Wonderland Road North intersection (655 Wonderland Road North), as well as the interfaces with existing commercial uses east and south of the Site and the drainage corridor east of the Site. Section 3.3 of this Report and the associated graphics illustrate the design response to these interfaces, particularly the interface with 655 Wonderland Road North which is immediately adjacent to the planned high-rise towers;
- The Site is serviced by transit and is within convenient walking distance of London Transit bus stops provided along the Wonderland Road North and Oxford Street West corridors; and
- Adjacent to the Site, both Oxford Street West and Wonderland Road North incorporate four through traffic lanes, turning lanes and sidewalks. Bike lanes are also provided on Wonderland Road North adjacent to the Site, with bike paths located adjacent to Wonderland Road North, further north of the Site, and along Oxford Street West, further west of the Site.



LEGEND

-  ACTIVE FRONTAGE ZONE
-  ZONE OF SENSITIVITY
-  TRANSIT STOPS




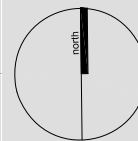
-  MAJOR TRANSIT ROUTE
-  PATH ADJACENT TO STREET
-  BIKE LANE

Figure 3
Spatial Analysis
Site Specific

 SUBJECT LANDS



3.0 Description of Proposal

3.1 Design Goals and Objectives

Captain Generation Mall is proposing to amend the planning permissions applying to the Site to allow for development of two high-rise apartment buildings on these lands. This intensification project is intended to be compatible with the local development context and complementary to the mix of uses within the Wonderland/Oxford node.

The following design objectives were identified to help achieve this project goal:

1. Introduce intensive, mixed-use (commercial/residential) buildings within the Site: (1) to function cohesively with the existing mall arrangement; (2) to support the diversification and long-term vitality of the Wonderland/Oxford node; and (3) to provide a design response that is compatible with the local development context;
2. Design high-rise forms that will create a prominent visual presence to further define the development node and to help frame, and reinforce, the street wall along Wonderland Road North and Oxford Street West;
3. Create a positive addition to the Wonderland/Oxford node by enhancing the visual qualities of these streetscapes and by providing an engaging pedestrian environment;
4. Intensify the Site in a manner that will be supportive of transit and alternative transportation modes, and will allow residents to walk to nearby shopping centres, offices, residential neighbourhoods, parkland and open space;
5. Incorporate enhanced indoor and outdoor amenity areas into the apartment building designs, and provide multiple pedestrian connections to provide accessibility to adjacent street frontages and the internal mall site;
6. Develop a vehicular ingress/egress arrangement that minimizes local traffic disruptions; and
7. Align the project with the design direction set out in the City's Official Plan and applicable guideline documents, where practical and appropriate.

3.2 Concept Plan

Stantec has prepared a conceptual site plan (concept plan) in support of the aforementioned design goals and objectives, and with consideration for the tower designs prepared by matter and a conceptual landscape plan designed by Ron Koudys Landscape Architects (RKLA). **Appendix A** of this Report illustrates the concept plan, master plan/connectivity plan and conceptual landscape plan. **Appendix B** includes selected floor plans for the proposed towers, **Appendix C** provides several architectural perspective drawings of the tower arrangement and the larger development plan (layout), and conceptual tower elevations/cross-sections are provided in **Appendix D**. Additionally, **Appendix E** provides a shadow assessment of the development plan prepared by matter.

Collectively, the plans and conceptual graphics included in this Report illustrate the layout, scale and character, and connectivity of the proposed development. The core elements of the proposed development are as follows:

Core Elements of Development Proposal:

- Two, 33 storey high-rise towers containing 408 units and providing several apartment configurations to promote housing choice and respond to local market demand. BLDG 3 (Tower A) would be positioned adjacent to Oxford Street North and BLDG 4 (Tower B) would be positioned adjacent to Wonderland Road North, with both buildings located proximate to the street intersection. This tower layout would yield a residential density of 124 units/ha, with consideration for existing non-residential uses discussed in this Report.
- High-rise tower designs that position and orient building mass to the Oxford Street West and Wonderland Road North frontages. Generally, each tower utilizes a podium at the base of each building with the core tower component containing residential units positioned above the podium components. Typical main level floor plates would be 2,131 m² and a typical floor plate for upper (residential) levels would be 1,240 m².
- Podium amenity features planned for each tower. The first floor (Parking Level P0) of each podium is to be accessible from the ground (mall) level and would integrate a combination of main entrance features, administrative space, lobby space, bicycle storage, general storage space and parking facilities. Commercial space and additional structured parking is allocated for the second floor of both towers (combined commercial GFA: 473 m²). Commercial units would front Wonderland Road North and Oxford Street West and would include street level entrances. The top floor of each podium (5th floor) is to accommodate additional lobby space, structured parking and indoor amenity space. Additional indoor/outdoor rooftop amenity areas would be provided on the 6th floor and the penthouse level.

- A parking arrangement comprised of structured parking facilities (426 spaces); with an additional 413 surface parking spaces provided to service the commercial component of this mixed-use development. Ramp access to the structured parking facility is provided from the mall level.
- An internal access arrangement integrating pedestrian and vehicular entrances/exits from the existing mall parking field, as well as street level pedestrian entrances from Oxford Street West and Wonderland Road South.
- Landscaping elements, including vegetated screening, would be provided at key locations to help enhance the pedestrian environment from both the mall level and street level.

3.3 Design Considerations

Design considerations are reflected in the concept plan, conceptual renderings and preliminary building elevations included with this Report. These elements are generally outlined below with input from matter, and further addressed in this Report. In our opinion, these design considerations and the associated conceptual plans demonstrate that this proposal would function effectively within the existing shopping centre arrangement and would integrate with the larger development context.

- **Building Form and Orientation.** The proposed high-rise towers would be positioned adjacent to the Oxford Street West and Wonderland Road North frontages, with building mass stepped back from podium elements: to help reinforce the urban building line and pedestrian realm along these street corridors; to accentuate the streetscape; and to transition building height from the street corner. Each tower incorporates a six storey podium component that typically presents as five storeys from street level, as the parking lot grade is lower than the adjacent road grades.

The following images generally illustrate the streetscapes adjacent to the Site.

Wonderland Street North Corridor: View south towards Site



Source: Google Maps, July 2023

Oxford Street West Corridor: View east towards Site



Source: Google Maps, July 2023

- **Building Massing.** The massing of the towers and integrated podiums are designed to create building forms that have consideration for the local development context, maintain a pedestrian scale and orientation along the street, and employ a contemporary design. Furthermore, the design has regard for the potential impact of this development on the existing commercial building (Nash Jewellers) at 655 Wonderland Road North. In this regard, matter has taken cues from this structure while considering the datums, openings, canopies and general massing at the intersection perspectives. Opportunities for integrated signage in the podium that can double as strategic advertising space for Nash Jewellers has also been identified on the towers.

The proposed buildings integrate three principal elements above-grade:

Podium Element: The six storey podium components are intended to create a pedestrian-oriented frontage along the adjacent streetscapes and establish a positive relationship with the pedestrian realm and the existing and planned built form. Notably, the podiums of Towers A and B include architectural elements to acknowledge and reflect the design features of the Nash Jewellers building (e.g., complementary glazing, horizontal datum elements intended to create an integrated development, use of grey/black/wood materiality). Podium elements would contain amenity space, lobby space, vehicular parking, bike storage, and accesses from both street level and the mall parking field (Parking Level P0). Further, podium elements would integrate design features to screen structured parking, while also helping to screen existing at-grade parking areas from street level. Street level entrances are to be provided at the second level (Parking Level P1).

Middle Element: Residential units are largely contained in a defined middle feature of each tower, extending from Floors 6 to 30. This building element includes the core apartment components above the podium base, with units containing individual balconies. The protruding balconies provide shadowing into and across the building surface. Additionally, the curvature of the tower forms, combined with distinctive vertical, horizontal and centralized material patterns, provides further

articulation to the middle elements. Collectively, the components of the middle feature promote a distinctive tower element that is intended to soften the massing of the building, contribute positively to the City's skyline, and help frame and enhance the adjacent streetscapes.

Top Element: The top of these buildings have been designed with distinctive architectural features that are intended to support a cohesive design theme for the high-rises. The rooftop elements would be setback from the core tower features and would contain penthouse units (Floor 31), rooftop terraces and mechanical equipment.

The architectural renderings and building elevations provided in Appendices C and D, respectively, further illustrate that the proposed massing has been broken up by projections, recessions and horizontal/vertical components. Additionally, visual articulation is achieved by varying building materials and heights, by providing wall and roofline elements, and by employing extensive glazing. Collectively, the components described above contribute to a modern, attractive design that would help to enhance the Oxford Street West and Wonderland Road North corridors.

- **Architectural Treatment.** The tower designs incorporate a cohesive, contemporary façade style integrating extensive glazing, and uneven lines, balconies, and windows to help break up the continuous mass of the structure. Additionally, the podium elements along the Oxford Street West and Wonderland Road North frontages allow the active commercial elements of the building to interface with the street frontages.
- **Pedestrian Environment.** The residential elements of the proposed towers are to be accessed by common (main) pedestrian entrances to each building from both the mall level and street level. Several architectural features and landscape elements are planned to help activate the streetscape and the mall level, including large windows within the towers, integrated signage and entrance canopies and enhanced hardscaping. Vegetated screening is also planned to partially conceal podium parking levels from the street and mall levels.

4.0 Planning Analysis

The proposed Official Plan and Zoning By-law Amendments must be assessed in terms of applicable policies prescribed by the Province of Ontario and the City of London. The following discussion outlines how the proposal addresses relevant policies of 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) 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 Policy Statement

PPS Policy	Response
<p>1.1.1 Healthy, livable and safe communities are sustained by:</p> <ul style="list-style-type: none"> 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 	<p>The proposed towers would accommodate approximately 408 market-based residential units and complementary commercial space on a 5.2 ha parcel that currently contains an existing shopping mall, multiple-unit commercial buildings and open space. The intensive, mixed-use character of this proposal supports compact urban form that would contribute to the long-term financial well-being of the Province of Ontario and the City of</p>

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>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>g) ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;</p>	<p>London (in the form of increased property tax assessment and the optimization of existing and planned infrastructure). The residential population, employees, and patrons of this development would also contribute to the overall viability of the Wonderland/Oxford node and the West London planning district. Moreover, economic benefits would be derived from construction of the high-rise towers.</p> <p>The subject lands are located within a local development area containing a wide variety of service/retail commercial activities and residential forms. Implementation of this proposal would be compatible with this development context and would help further diversify the range and mix of multiple-unit housing available in West London. Additionally, to service the needs of future residents and employees, the Site is proximate to commercial businesses, offices, institutional uses, public transit and the City's arterial road system and active mobility network.</p> <p>The proposed development should not result in environmental or public health and safety concerns.</p> <p>Preliminary water supply, sanitary sewage and stormwater management servicing reviews have been completed by Stantec to confirm that (1) the development can proceed in a cost-effective manner and (2) the necessary</p>

PPS Policy	Response
	<p>servicing infrastructure would be available to meet projected needs.</p> <p>It is anticipated that public service facilities available in the vicinity of the Site 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>This proposal would develop lands located within the City’s Urban Growth Boundary (UGB) designated for residential and commercial purposes and high-rise forms pursuant to The London Plan. As discussed in Section 4.2 of this Report, this proposal conforms to the use permissions of the Official Plan. This development would also help the City accommodate its forecasted population growth and achieve its projected housing requirements as set out in The London Plan and related policy documents.</p> <p>As discussed, this proposal would introduce intensive development on the Site to support the overall vitality of the Wonderland/Oxford node and, more broadly, the West London planning district. Moreover, implementation of this proposal would broaden the range and mix of housing available in the UGB to respond to market demand.</p>
<p>1.1.3.1 Settlement areas shall be the focus of growth and development.</p>	<p>The Site is located within the City’s UGB and is 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 	<p>The proposed tower configuration represents a compact land use pattern that supports the efficient use of land and services. As outlined in this Report, preliminary servicing reviews have been carried to confirm that adequate servicing capacity is available to</p>

PPS Policy	Response
<p>service facilities which are planned or 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>accommodate the intended development.</p> <p>It is anticipated that future residents and employees of this development would support existing public service programs and facilities available proximate to the Site.</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 multiple pedestrian connections to the Wonderland Road North and Oxford Street South corridors and the mall lands. Bicycle storage space is also planned for the ground (mall) level of each tower podium.</p> <p>The subject lands are located within convenient walking distance of existing London Transit bus stops; providing transit connectivity to employment areas, major public and cultural institutions, shopping centres and recreational facilities.</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> <p>b) permitting and facilitating:</p> <p>1. all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including</p>	<p>Development of two high-rise apartment towers on the Site would broaden the range and mix of multiple-unit, market-based housing available in the West London community. As discussed, this project would also help the City accommodate its forecasted population growth and projected housing requirements.</p> <p>Preliminary studies have been completed by Stantec to confirm that</p>

PPS Policy	Response
<p>special needs requirements and needs arising from demographic changes and employment opportunities;</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 services facilities, and support the use of active transportation and transit in areas where it exists or is to be developed.</p>	<p>servicing infrastructure is available to meet projected needs. Additionally, it is anticipated that existing public service facilities available in the vicinity of the property would accommodate the projected demands of this development.</p> <p>This development plan would utilize existing land and servicing resources in an efficient manner and would be supported by the road transportation system, the active transportation network and transit services.</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 walkway connections to municipal sidewalks, outdoor (rooftop) amenity areas and bicycle storage areas. Secondly, to promote community connectivity, the proposal supports the introduction of intensive housing forms within an established development node proximate to existing neighbourhoods, employment opportunities, institutional uses, recreational facilities, public transit and the City’s active mobility network.</p>
<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</p>	<p>Preliminary servicing reviews have been carried out by Stantec 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. As discussed, it is anticipated that the development can</p>

PPS Policy	Response
<p>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>be accommodated by existing public service facilities.</p>
<p>1.6.7.2 Efficient use shall 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 January 2024, that the existing road network can accommodate the proposed development with consideration for recommended remedial measures. These include implementing traffic signal control for the existing full-moves Oxford Street West, operational and geometric modifications for adjacent intersections and transportation demand management measures for the development (e.g., bicycle parking, car share space).</p> <p>The Site is located within convenient walking distance of existing London Transit services, and several bus routes are in operation along the Oxford Street West and Wonderland 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).</p> <p>The proximity of the Site to service/retail commercial uses, established residential neighbourhoods, employment opportunities, community facilities and parks would help future</p>

PPS Policy	Response
	<p>residents, employees and patrons minimize the length and frequency of vehicle trips. Convenient access to the City's sidewalk and cycling network would also encourage active transportation. Furthermore, introducing an intensive, mixed-use development on the Site would support existing and future investments in public transit.</p>
<p>1.7.1 Long-term economic prosperity should be supported by:</p> <ul style="list-style-type: none"> 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; c) optimizing the long-term availability and use of land, resources, infrastructure and public service facilities; d) maintaining and, where possible, enhancing the vitality and viability of downtowns and mainstreets; 	<p>This proposal has been designed to optimize the use of the subject lands for a mix of market-based residential units and complementary commercial space. The Site benefits from close proximity to arterial road transportation networks, transit services and public facilities. It is expected that residents, employees and patrons of the proposed development would support these services and facilities. It is also anticipated that the residential population within the proposed towers would contribute to the long-term vitality of existing service/retail commercial uses within the London Mall and, more broadly, the Wonderland/Oxford node.</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 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; 	<p>The project supports the intensive use of designated residential/commercial lands situated within an established development node, fronting arterial road corridors and connected via active transportation networks and public transit to residential neighbourhoods, employment areas, educational institutions and parkland.</p> <p>Development of this project would further broaden housing choice in the vicinity of the Wonderland/Oxford node. Moreover, the intensive nature of</p>

PPS Policy	Response
<p>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>	<p>this mixed-use development would support existing transit services and future transit investments. It is expected that the proximity of subject lands to the above-noted mix of land uses would reduce commuting requirements for residents and employees (thereby decreasing transportation congestion).</p>

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 project is consistent with this broad vision. In this regard, the intended development plan:

- Represents a compact, mixed-use building form that would intensify an existing commercial centre situated within an established development node and designated for commercial and residential uses;
- Introduces an intensive residential type that: has regard for the existing development context; provides a pedestrian orientation; encourages active transportation; and is serviced by the City’s arterial road network and transit services;
- Proposes 408 apartment units to broaden multiple-unit housing choice for current and future residents of West London and assist the City in meeting its projected demand for high density residential units; and
- Promotes a scale of residential development that would (1) contribute to the optimization of municipal investments in servicing infrastructure and public transit, (2) support the vitality and viability of commercial activities proximate to the Site, and (3) generate tax revenues to benefit the financial well-being of the Province and the City.

In light of these considerations and our broader evaluation of this proposal relative to the policies of the PPS, it is our opinion that this development proposal is consistent with this policy document.

4.2 City of London Official Plan (The London Plan)

4.2.1 Status

The City of London Council adopted a new Official Plan on June 23, 2016 and the Ministry of Municipal Affairs 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 (Map 1)

Figure 4 of this Report illustrates that the project site is predominately designated Transit Village pursuant to Map 1 (Place Types) of The London Plan, with the eastern portion of the Site designated Green Space. The proposed development is to be located entirely within the boundaries of the Transit Village place type. No development is planned within the Green Space place type.

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

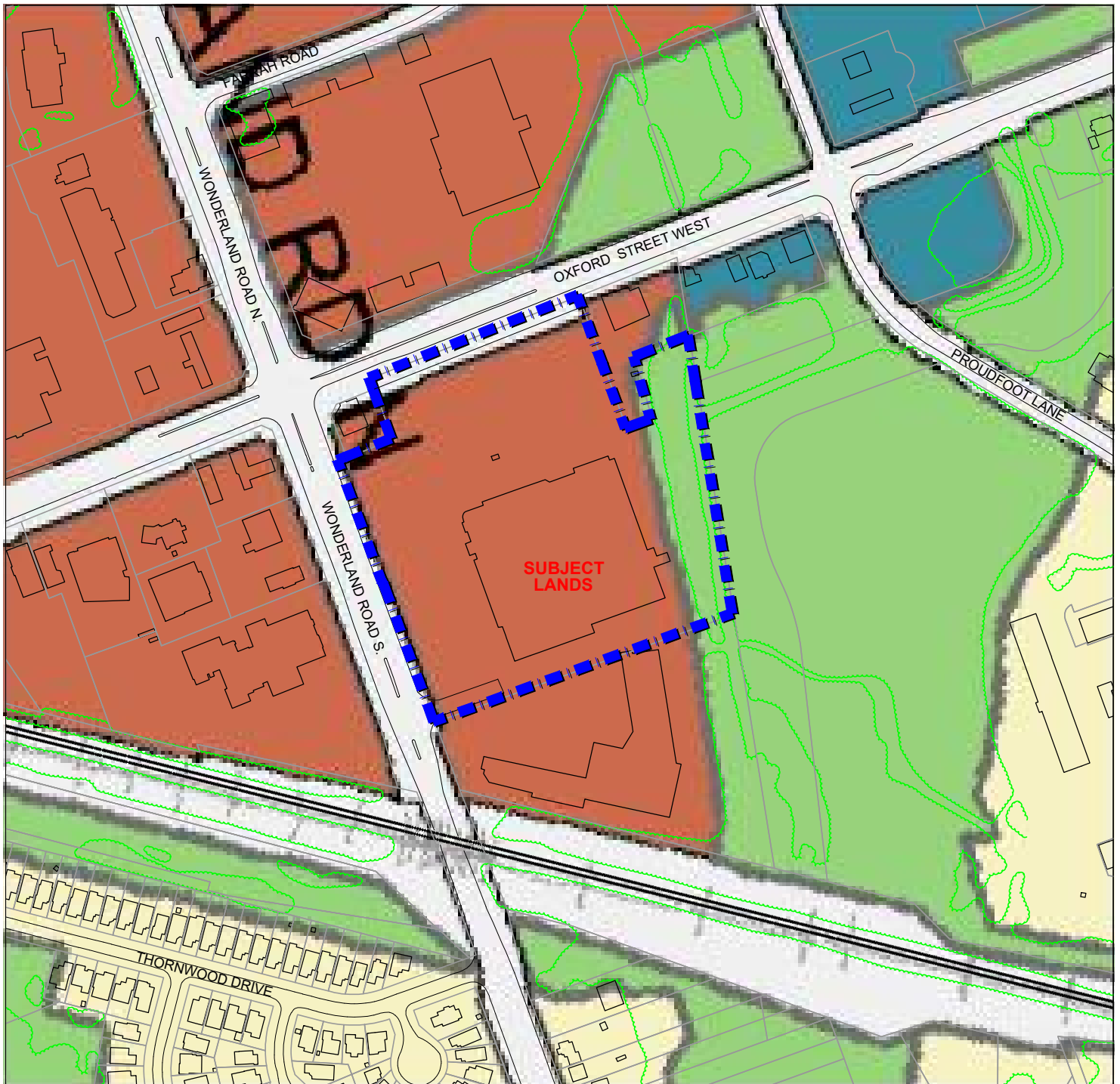
4.2.4 Our Strategy

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.



LEGEND

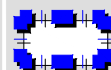
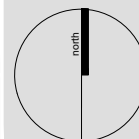
- NEIGHBOURHOODS
- GREEN SPACE
- TRANSIT VILLAGE
- RAPID TRANSIT CORRIDOR

Figure 4
The London Plan
 Map 1
 Place Types


**PLANNING
 URBAN DESIGN
 & LANDSCAPE
 ARCHITECTURE**
MHBC PLANNING
540 BINGEMANS DRIVE,
 SUITE #200
 KITCHENER, ON, N2B 3X9
 P: 519 576 3650
 WWW.MHBCPLAN.COM

DATE: January 19, 2024

SCALE 1 : 4,000



SUBJECT LANDS

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 with 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 mixed-use, 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 and supports existing transit service and future transit investments;
- Intensifies the use of the subject lands in a manner that would: function cohesively within the existing shopping centre on the Site; collectively support the diversification and long-term vitality of the Wonderland/Oxford node; and promote a walkable and connected community;
- Broadens the range of multiple-unit housing available within the West London community to respond to market demand;
- Introduces prominent tower forms to (1) support the inward and upward development pattern encouraged by The London Plan and (2) contribute to a diverse and definable community character; and
- Incorporates a land use pattern that: is in keeping with Provincial and City planning policies; is compatible with the local development context; and should not generate adverse land use impacts.

With respect to ‘fit’ considerations, several design elements are incorporated into the development concept to promote compatibility with these surrounding uses, including:

- Positioning the buildings towards Oxford Street West and Wonderland Road North to maintain and extend the existing street wall along these corridors;
- Providing podium elements adjacent to Oxford Street West and Wonderland Road North: to reference low-rise building heights along these frontages; to enhance the pedestrian environment at the street level; to further transition building heights to

integrate the building form into the surrounding context; and to help screen at-grade parking to minimize the visual impact of parking facilities from these streets; and

- Incorporating a cohesive, contemporary architectural style emphasizing a pedestrian scale at the street level and employing extensive glazing, balconies, centralized material patterns and distinctive tower curvature to help break up the continuous mass of the structures.

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 of this Official Plan 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 with 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 direction relating to each of these frameworks. Within this policy structure, it is identified that the subject property is located within the City's Urban Growth Boundary and Built-Area Boundary pursuant to Figures 1 and 2 of The London Plan, respectively, of the Growth Framework. The Site is also situated within the City's Primary Transit Area as delineated on Figure 3.

In our opinion, the introduction of mixed-use, high-rise towers on lands within the Transit Village place type has regard for applicable policies and schedules relating to the five frameworks of the City Structure Plan. Most notably, the plan addresses the intensification objectives of the Built-Area Boundary and the Primary Transit Area components of the growth framework.

4.2.5.2 Built-Area Boundary/Primary Transit Area

With respect 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 plan supports the aforementioned policy direction for the Built-Area Boundary and the Primary Transit Area, as the project would:

- Direct intensification to an appropriate place type and a location that can accommodate the intended use and is serviced by the City's arterial road network, transit and active transportation systems;
- Employ a high standard of urban design;
- Incorporate a mix of high density residential and complementary commercial uses to support the diversification, intensification and overall vitality of the Wonderland/Oxford node; and
- Provide a transit-oriented development within convenient walking distance of London Transit services provided along Oxford Street West and Wonderland Road North. The Site is also well serviced by sidewalks and cycling lanes.

Additionally, 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, a preliminary servicing review has 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.

As also summarized in Table 3.0, the property is designated for residential and commercial purposes and to permit high-rise forms. Further, this project would have access to, and would contribute to the optimization of, the arterial road transportation network, transit services, municipal servicing infrastructure, active transportation infrastructure and public service facilities.

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

4.2.5.3 Transit Village and Rapid Transit Corridors

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 all of these place types are to (1) allow for intense, mixed-use neighbourhoods and business areas and (2) help to make rapid transit viable in London.

Further Policy 98 provides planning direction for these rapid transit-oriented place types:

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

2. Plan for four Transit Villages that support intense forms of mixed-use development.

4. Plan for a high level of residential amenity and public service within the Downtown, Transit Villages and Rapid Transit Corridors.
5. Utilize the Transit Villages and Rapid Transit Corridors to create abundant opportunities for growth and development that can be achieved in a cost-efficient way.”

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

- Introduces high density residential types and complementary commercial space to facilitate both intensification and a greater mix of uses within the Site;
- Employs a high standard of urban design (1) to contribute positively to the West London community and to further frame the Wonderland/Oxford node and (2) to connect with, and support, pedestrian, cycling and transit opportunities proximate to this area; and
- Utilizes existing infrastructure to support an efficient development pattern, increase the housing supply in West London and further diversify housing choice within a designated Rapid Transit Village fronting a designated Rapid Transit Corridor (Oxford Street West).

4.2.6 **City Design**

Within the City Building part of this Official Plan, the City Design chapter provides a series of guidelines with respect to urban design. Policies 189 to 306 of this Official Plan define the City Design 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. Of particular relevance to this proposal are City Design policies related to the neighbourhood 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. ...
- 220_ Neighbourhoods should be designed with a diversity of lot patterns and sizes to support a range of housing choices, mix of uses and to accommodate a variety of ages and abilities.
- 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.
- 269_ Buildings should be sited to minimize the visual exposure of parking areas to the street.
- 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.
- 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 including the design review provided in Section 3.3, it is our opinion that the proposed high-rise tower arrangement is in keeping with the aforementioned design direction. Most notably, the tower designs are collectively intended to: promote a definable sense of place; integrate within the local development context; effectively transition height and massing; and utilize efficient tower floor plates to minimize potential impacts on adjacent properties.

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

- The proposed tower podiums would integrate articulated elevations, prominent entrances and reduced building setbacks: to help enhance the pedestrian character and street edge along Oxford Street West and Wonderland Road North. In effect, the podium components and the associated towers would help establish a more prominent nodal form while also further framing this major intersection and promoting a sense of enclosure relative to the adjacent street corridors;
- The parking arrangement for the towers would be comprised of structured parking within podium elements complimented by surface parking areas associated with the mall parking field. Pedestrian walkways would be provided within surface parking

areas servicing these towers (mall level) and, at entrance features, would integrate hardscaping elements (e.g., patterned paving) to promote an enhanced pedestrian realm;

- Podium elements would include direct entrances from Oxford Street West and Wonderland Road North to support active transportation and convenient access to public transit stops; and
- Existing vehicular accesses to the Site would be maintained to minimize the potential impacts on traffic movement in the vicinity of the Oxford Street West/Wonderland Road North intersection.

4.2.7 Transit Village Place Type

As discussed, the Site is located within the Transit Village place type. Generally, Policies 807 and 808 of The London Plan describe that this place type: is applied to mixed-use areas that are centrally located around rapid transit stations; is intended to support the City's rapid transit system; and is to promote development supportive of active transportation opportunities to help reduce traffic congestion. Policy 809 identifies that areas designated Transit Village are existing built-up areas with opportunities for infill, redevelopment, and a more efficient use of land.

Policy 811 states that a broad range of residential, retail, service, office, cultural, institutional, hospitality, entertainment, recreational, and other related uses are permitted in Transit Villages. This Policy also states that mixed-use buildings are encouraged. With respect to development intensity, Policy 813 and Table 8 of the Official Plan prescribe that the standard maximum building height within Transit Villages is 15 storeys, with the upper maximum height being 22 storeys. Prescribed building heights are exclusive of Secondary Plan permissions and site-specific permissions. Policy 813 further identifies the following in relation to the review of development applications within this place type:

"Planning and development applications within the Transit Village Place Type will be evaluated to ensure that they provide for an adequate level of intensity to support the goals of the Place Type, including supporting rapid transit, efficiently utilizing infrastructure and services, ensuring that the limited amount of land within this place type is fully utilized, and promoting mixed-use forms of development."

Given this policy framework, in our opinion the components of this proposal are consistent with those intensity provisions: supporting the introduction of residential and commercial development into Rapid Transit Villages; encouraging the efficient use of land, infrastructure and services; and promoting mixed-use developments and active transportation opportunities. The proposal does not conform with Policy 813_1 and Table 8 of The London Plan, which prescribe that buildings in this place type are to have an upper maximum height of 22 storeys.

Accordingly, an OPA is necessary to permit building forms on the Site having a maximum height of 33 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).

Policy 814 sets out a several policies respecting built form for Transit Villages. In our opinion, the following policies are relevant to this proposal:

- “1. All planning and development applications will conform with the City Design policies of this Plan.
2. High-quality architectural design will be encouraged within Transit Villages.
3. Buildings and the public realm will be designed to be pedestrian, cycling and transit-supportive through building orientation, location of entrances, clearly marked pedestrian pathways, widened sidewalks, cycling infrastructure, and general site layout that reinforces pedestrian safety and easy navigation.
5. Consideration should be given to providing publicly-accessible pedestrian connections through a proposed development site connecting with the pedestrian network on existing and future adjacent sites.
7. The base of all buildings will be designed to establish and support a high-quality pedestrian environment.
8. Pedestrian traffic associated with rapid transit stations should be considered in the design of the station, the public realm, and adjacent developments.
9. Massing and architecture within the Transit Village should provide for articulated façades and rooflines, accented main entry points, and generous use of glazing and other façade treatments along sidewalk areas such as weather protection features to support a quality pedestrian environment.
10. Creative and distinctive forms of building design are encouraged within the Transit Villages.
11. Surface parking areas should be located in the rear and interior sideyard. Underground parking and structured parking integrated within the building design is encouraged.
13. Planning and development applications will be required to demonstrate how the proposed development can be coordinated with existing, planned and potential development on surrounding lands within the Transit Village Place Type.”

It is our opinion that the proposed development is in keeping with the above-referenced policies, in light of the following key considerations:

- The proposed development aligns with the City Design policies as discussed in the previous Section of this Report;
- The high-rise towers would integrate a high standard of architectural design that would also: promote distinctive building forms; support transit services and active transportation; and to integrate structured parking; and
- The podium elements of the proposed towers are positioned in close proximity to street frontages to help reinforce the prevailing street wall along the Oxford Street West and Wonderland Road North corridors. Architectural elements associated with the podiums are intended to achieve visual articulation and soften the massing of the building at grade (e.g., colour/material variation, extensive glazing, entrance canopies). Further, pedestrian connections associated with the podiums would contribute to a cohesive, mixed-use development that is intended to support the diversification, intensification and long-term vitality of Wonderland/Oxford development node (and the associated Transit Village). The positioning of the podium components also allows for an increased separation distance between the tower elements and adjacent buildings.

4.2.8 Protected Major Transit Station Areas

The Site forms part of a Transit Village Protected Major Transit Station Area (TVPMTSA) as delineated on Map 10 (Protected Major Transit Station Areas) of this Official Plan. The following are policies prescribed for TVPMTSAs:

- “815A_ All Transit Villages are identified as Protected Major Transit Station Areas, as shown on Map 10.
- 815B_ Each Transit Village Protected Major Transit Station Area will be planned to achieve a minimum number of 150 residents and jobs combined per hectare.
- 815C_ Within the Transit Village Protected Major Transit Station Areas, the minimum building height is either two storeys or eight metres and the maximum building height is 22 storeys.
- 815D_ Within the Transit Village Protected Major Transit Station Areas, the minimum density is 45 units per hectare for residential uses or a floor area ratio of 0.5 for non-residential uses.
- 815E_ In the Transit Village Protected Major Transit Station Areas, a broad range of residential, retail, service, office, cultural, institutional, hospitality, entertainment, recreational, and other related uses may be permitted. Mixed-use buildings will be encouraged.

815F_ Development within the Transit Village Protected Major Transit Station Areas will conform with all other policies of the London Plan including the Transit Village Place Type and any Specific Area Policies.”

It is our opinion that the proposed development is generally consistent with the above-referenced policies, in light of the following considerations:

- As discussed, the Site is located within a defined Transit Village place type (addressing Policy 815A).
- 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 aligns with the minimum expectation for residents and jobs per hectare prescribed in Section 815B:
 - Total development area: 4.5 ha;
 - Total dwelling units at build-out: 408 units;
 - Total population at build-out (408 units x 1.68 persons/unit): 686 persons;
 - Estimated employment at build-out ($14,565 \text{ m}^2 \div 39.5 \text{ m}^2/\text{worker}$): 369 jobs;
 - Total residents and jobs per hectare ($1,055 \text{ persons/jobs} \div 4.5 \text{ ha}$): 235.
- With inclusion of the proposed towers, the Site would yield (1) a residential density of 91 units/ha, excluding equivalent non-residential units, and (2) a floor area ratio of 0.32 for non-residential uses. In our opinion, as the proposed development is principally a residential project, the intensity requirements of Policy 815D are satisfied (i.e., the proposed residential density exceeds 45 units/ha). The complementary non-residential development included within the apartment towers provides a minor increase (~3.3%) to the total commercial gross floor area contained within the Site. In this regard, the calculated floor area ratio for this shopping centre largely reflects the existing condition. Accordingly, in our opinion, a Specific Area policy should not be required to recognize that the floor area ratio for non-residential uses does not achieve the 0.5 minimum prescribed in Policy 815D.
- With implementation of this proposal, a mix of residential and service/retail commercial uses would be accommodated within the Site. As discussed, the intended mix of uses is consistent with the permissions of Policy 815E.
- The proposed development would conform to all other policies of The London Plan, with consideration for the proposed Specific Area policy discussed in Section 4.3.10 of this Report. This site-specific permission would allow for a maximum building height of 33 storeys on the Site (which exceeds the permission defined in Policy 815C).

4.2.9 Impact Mitigation

Policy 1638 prescribes that a site-specific ZBA is required for a project to exceed the standard maximum height and an OPA is also required for a project 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, Captain Generation Mall is proposing several design elements to integrate the project into the local development setting and to mitigate potential land use impacts associated with the proposed 33 storey building height.

Planned Mitigation Measures:

- **Site/Building Design.** As discussed in this Report, collectively the building design and site layout of the tower arrangement incorporates contemporary architectural themes and design elements to promote compatibility with surrounding land uses and the development context proximate to the Wonderland/Oxford node. Additionally, the majority of vehicular parking is to be accommodated in structured parking facilities with existing surface parking field partially screened from the Wonderland Road North and Oxford Street West frontage by the tower podiums;
- **Sustainable Development.** The proposed tower development would be designed with consideration for suitable sustainability techniques, materials and systems. Additionally, landscape plans for common outdoor amenity areas would consider sustainable design elements; and
- **Active Transportation.** Secure bicycle storage would be provided in the parking structures for building residents. Walkway connections from the tower podium and surface parking field would provide additional connectivity to street frontages, bike lanes and transit stops.

Given the foregoing and commentary provided in this Report, in our opinion the additional building height associated with this project is (1) appropriate for the local development context and (2) mitigated by design elements intended for the project. It is therefore our opinion that the proposal aligns with the considerations for additional building height set out in Policies 1638 and 1640.

4.2.10 **Our Tools**

4.2.10.1 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”. Policy 1716 itemizes a number of approved guidelines, including the City of London Placemaking Guidelines which, in our opinion is particularly relevant to this proposal.

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. In our opinion, a number of goals and themes set out in this document are relevant to this intensification proposal.

The following summarizes the principal (core) guidelines that generally provided design direction for this project, noting that the design response to these key considerations is largely addressed within this Report and illustrated within the associated Appendices.

Site Context and Community Elements:

- Establish key social, pedestrian and public transit connections between new development and the existing fabric of the city.
- Identify key streetscapes and coordinate the conceptual design and location of landscaping and built forms.
- 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.

Focal Points and Public Realm:

- Utilize paving and landscaping treatments in the design of visual focal points.
- Design convenient pedestrian linkages to focal points and public transit.
- Employ exterior building materials and colours that are stylistically appropriate.
- Avoid architectural designs that are ubiquitous and non-descript because they do not contribute to a sense of place.

Pedestrian Environments:

- 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.

4.2.10.2 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).

With respect to the defined criteria set out in these Policies, in our opinion, the proposal demonstrates consistency with the PPS and generally conformity with provisions of The London Plan; recognizing that the intensity of the project requires a Specific Area permission to conform with this Official Plan. With consideration for studies completed in conjunction with these applications, it is also our opinion that the intended design components of the planned mixed-use, high-rises and the associated site layout should not generate significant land use impacts, particularly in relation to loss of privacy, shadowing and visual impacts 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 local development setting.

4.2.11 Specific Area Policies

Policy 1730 of The London Plan states that, in limited circumstances, adoption of policies for Specific Areas may be considered where five 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 22 storey upper maximum building height permissions of the Transit Village place type and TVPMTSAs. In our opinion, the merits of this proposal set out in this Report warrant the requested 33 storey building height (e.g., contemporary building design; compatibility with local development context; complementary design and uses; proximity to shopping, employment, transit, bike lanes and pathways, arterial road systems and existing high-rises).

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 the associated Transit Village place type and TVPMTSA 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, this project would integrate two prominent high-rise towers on a Site that: can accommodate the intended use cohesively within the existing mall context; is supported by the arterial road network, public transit and active transportation systems; is located within an established commercial node; is situated in proximity to existing apartment buildings; and is designated for residential/commercial purposes and high-rise development. In our opinion, this proposal represents a site-specific intensification opportunity that would not establish a precedent for other properties in the vicinity of the subject lands.

“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 a designated Transit Village. In this respect, the requested building height permits the proposed unit yield to be contained within efficient tower forms, while also accommodating amenity areas, commercial space and parking in the tower podiums. In our opinion, the configuration and design elements of the podium and tower components contribute positively to the pedestrian-oriented streetscape along Oxford Street West and Wonderland Road North.

In order to bring the proposal into conformity with maximum height permissions, the tower height would need to be decreased to a maximum of 22 storeys, which would reduce the total unit yield if the proposed high-rise arrangement and floor plate configuration is maintained. In effect, this modification would reduce the level of intensification associated with this project and subsequently its ability to help satisfy market demand. Alternatively, additional towers or larger building floor plates could be introduced to provide yield comparable to the 408 units proposed for this development. In our opinion, both of these options would detract from the overall merits of the proposal as discussed 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 Provincial Policy Statement and The London Plan. Accordingly, it is our opinion that for this proposed intensification project, a Specific Area policy represents good planning and would appropriately implement the intended tower arrangement.

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 satisfy several key considerations identified in this Sub-Policy, including traffic and access management, parking, privacy, shadowing and visual impacts. Additionally, with respect to Sub-Policy 7 which addresses ‘fit’, in our opinion the proposed tower arrangement and site layout 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.

4.2.12 **Community Consultation Strategy**

With respect to compatibility considerations set out in Policy 1578, Captain Generation Mall Limited intends to carry out public consultation for these applications consistent with the requirements of the Planning Act.

4.2.13 **Summary**

In summary, it is our opinion that the proposed development supports the broad vision of The London Plan, as well as the direction and core objectives of Primary Transit Area and TVPMTSA policies. With provision of a Specific Area policy allowing for a maximum building height of 33 storeys, the proposal would also align with the development permissions prescribed for Transit Villages and TVPMTSAs. Moreover, the concept plan includes elements that support the urban design principles of this Official Plan and the design direction of the City’s Placemaking Guidelines.

5.0

City of London Zoning By-law Z.-1

5.1 Existing Zoning

Figure 5 of this Report illustrates that the Site is zoned 'Community Shopping Area (CSA4)' and 'Open Space (OS4)' pursuant to Schedule "A" of the City of London Zoning By-law No. Z.-1 (Zoning By-law). The developed portion of these lands is zoned CSA4; the corridor containing the East Branch of Mud Creek is zoned OS4. The proposed towers are to be located within the commercially-zoned portion of this property.

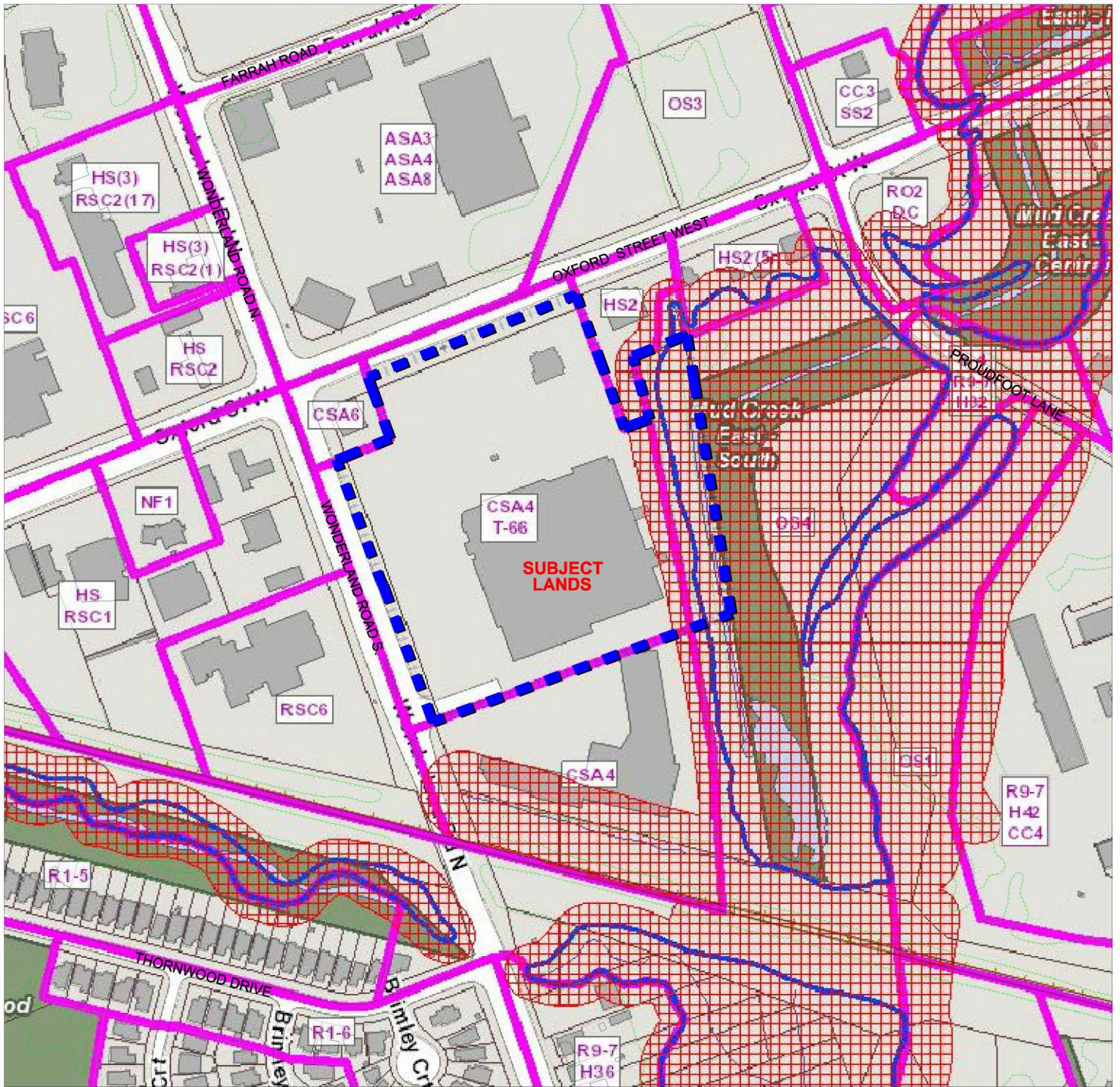
As set out in Section 22 of the Zoning By-law, the parent CSA Zone permits a wide range of community-scale retail and personal service uses, as well as office, medical and dental office, commercial recreation, community facilities and restaurant uses. Further, as prescribed in this Section, the CSA4 Zone Variation integrates several regulations to guide the scale of development, including a minimum front and exterior side yard depth of 10 m, a maximum lot coverage of 30%, total gross floor area of 20,000 m² and a maximum building height of 9.0 m.

Temporary Zone (T-66) is also applied to the lands zoned CSA4. Section 50.2 of the Zoning By-law identifies that this temporary permission allows for the lands to be used for an automobile sales and service establishment for a period not exceeding 18 months from the date of passing of the implementing by-law (January 10, 2012). This temporary permission has no applicability to this proposal.

5.2 Proposed Zoning

Following an analysis of the Zoning By-law, it was concluded that the existing CSA4 zoning structure does not permit the intended building form or site layout. It was also concluded through this review that the proposed tower arrangement most closely aligns with the permissions of the Residential R9 Zone regime.

The Residential R9 (R9-7) Zone variation is proposed to accommodate this development layout, as the zoning is commonly applied to high density residential forms in areas situated outside of Central London. In this regard, pursuant to the permissions of Section 13 of the Zoning By-law, the R9-7 Zone variation supports a variety of intensive residential housing forms (e.g., apartment buildings, senior citizens apartments, continuum-of-care facilities) and permits a maximum density of 150 units/ha. The standard R9-7 Zone regulations do not specify a maximum building height.



LEGEND

- ZONE LIMITS
- R1 RESIDENTIAL R1 ZONE
- R6 RESIDENTIAL R6 ZONE
- R9 RESIDENTIAL R9 ZONE
- CF COMMUNITY FACILITY ZONE
- CSA COMMERCIAL SHOPPING AREA ZONE
- ASA ASSOCIATED SHOPPING AREA ZONE
- NF FACILITY ZONE
- DC DAY CARE ZONE
- RSC RESTRICTED SERVICE COMMERCIAL ZONE
- HS HIGHWAY SERVICE COMMERCIAL ZONE
- CC3 CONVENIENCE COMMERCIAL ZONE
- SS2 AUTOMOBILE SERVICE STATION ZONE
- RO RESTRICTED OFFICE ZONE
- OS OPEN SPACE ZONE
- T TEMPORARY ZONE
- D DENSITY PROVISION
- H HEIGHT PROVISION
- REGULATORY FLOODLINE
- CONSERVATION AUTHORITY REGULATED AREA

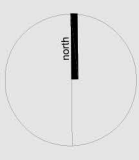
Figure 5
Existing Zoning



SUBJECT LANDS

MHBC PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE
 200-540 BINGEMANS CENTRE DR. KITCHENER, ON, N2B 3X9
 P: 519.576.3650 F: 519.576.0121 | WWW.MHBCPLAN.COM

DATE: March 31, 2021 SCALE 1 : 4,000

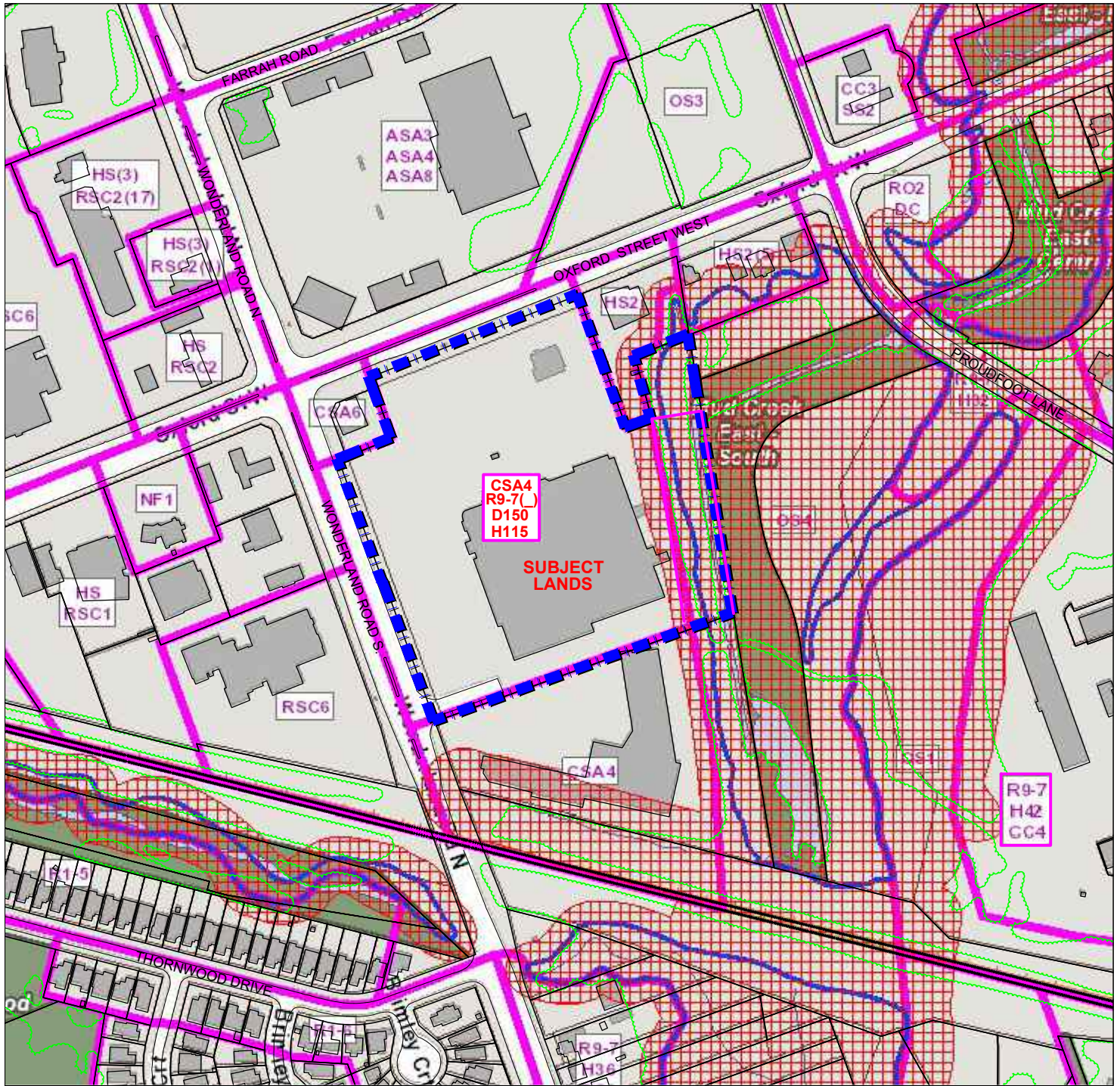


It is anticipated that a 'Residential R9 Special Provision (R9-7(□)*D150*H115)' Zone would be compounded with the existing CSA4 Zone to accommodate the intended development layout. It is also anticipated that, at a minimum, this zoning structure would include site-specific permissions for a 33 storey building height, reduced front yard and exterior side yard setbacks.

Appendix F to this Report contains a Zoning Data Sheet prepared by MHBC for this project. This zoning review illustrates that the proposed building scale and site layout meet a number of the applicable R9-7 Zone regulations. However, a site-specific R9-7 Zone variation is required under Section 13.4 of the Zoning By-law to address the following matters, and to provide flexibility to accommodate minor design modifications that may arise during project planning:

- Permit a site-specific maximum building height of 115 m to reflect the planned 33 storey high-rise towers, inclusive of the rooftop amenity area;
- Prescribe a maximum residential density of 150 units/ha to permit intensive residential forms on the Site that would support the efficient use of existing infrastructure and public services. The requested density includes consideration for equivalent non-residential dwelling units and is consistent with the maximum permission of the R9-7 Zone prescribed in Table 13.3 of the Zoning By-law;
- Reduce the front yard and exterior side yard setbacks to 0.0 m to support a pedestrian orientation and a more contiguous street wall;
- Establish a 9.0% minimum landscaped open space requirement for the Site, reflecting the minimum requirement of the CSA4 Zone and recognizing that the landscaped open space provided within the development would exceed 21% if the lands zoned OS4 were included with in the calculation;
- Establish a maximum lot coverage of 40% for the entire shopping centre site to permit the proposed intensification project in conjunction with existing development;
- Allow uses permitted in the CSA4 Zone to be located within the second floor of the towers (i.e., street level); and
- Maintain all other standard permissions of the R9-7 and CSA4 Zones.

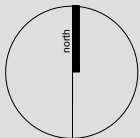
Figure 6 of this Report illustrates the 'Community Shopping Area/Residential R9 Special Provision (CSA4/R9-7(□)*D150*H115)' Zone proposed to accommodate the proposed mixed-use towers.



LEGEND	
	ZONE LIMITS
R1	RESIDENTIAL R1 ZONE
R6	RESIDENTIAL R6 ZONE
R9	RESIDENTIAL R9 ZONE
CF	COMMUNITY FACILITY ZONE
CSA	COMMERCIAL SHOPPING AREA ZONE
ASA	ASSOCIATED SHOPPING AREA ZONE
NF	FACILITY ZONE
DC	DAY CARE ZONE
RSC	RESTRICTED SERVICE COMMERCIAL ZONE
HS	HIGHWAY SERVICE COMMERCIAL ZONE
CC3	CONVENIENCE COMMERCIAL ZONE
SS2	AUTOMOBILE SERVICE STATION ZONE
RO	RESTRICTED OFFICE ZONE
OS	OPEN SPACE ZONE
T	TEMPORARY ZONE
D	DENSITY PROVISION
H	HEIGHT PROVISION
	REGULATORY FLOODLINE
	CONSERVATION AUTHORITY REGULATED AREA

Figure 6
Proposed Zoning


**PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE**
MHBC PLANNING
 540 BINGEMANS DRIVE,
 SUITE #200
 KITCHENER, ON, N2B 3X9
 P: 519-576-3650
 WWW.MHBCPLAN.COM

DATE: January 19, 2024 SCALE 1 : 4,000

 P:\1094\Y\Graphics\
 Figure 6 - Proposed Zoning - 19Jan2024

 **SUBJECT LANDS**

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, on consideration of the following merits:

- The subject lands are located within the Urban Growth Boundary and Primary Transit Area of the City of London, form part of the City's West London planning district, are situated within an established development node and are designated for commercial and residential purposes. The property is also located within a Protected Major Transit Station Area pursuant to The London Plan;
- The Site is well suited for intensive residential forms, given its physical characteristics, its location within a prominent development node, and its proximity to the arterial road network, public transit, active transportation routes, offices, schools, parks and residential neighbourhoods. Further, introducing high-rise apartment buildings within the London Mall site would support the diversification, intensification and overall vitality of the Wonderland/Oxford node;
- 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 and to promote compact, efficient development. Additionally, the contemporary, high-rise tower design is intended to limit shadow impacts and to minimize obstruction of views proximate to the Site;
- Design components integrated into the proposal would contribute positively to the local streetscape and the City's skyline. Additionally, the podium elements of these buildings have been designed to help enhance the pedestrian environment along the both the Oxford Street West and Wonderland Road North corridors;
- The apartment unit configurations planned for the upper floors of the towers would broaden housing choice within the West London community. These additional units would also help to promote neighbourhood stability by diversifying the mix of housing available in the community (to better meet the changing needs of local residents over the long-term);
- Assessments carried out for the project generally conclude that the City's servicing infrastructure and road network can accommodate the proposed development (with consideration for study recommendations); and

- In our opinion, this intensification 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
- The proposed site-specific Official Plan Amendments and Zoning By-law Amendments would appropriately implement the intended tower designs and site layout.

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

Respectfully submitted,

MHBC

A handwritten signature in black ink, appearing to read "Scott Allen".

Scott Allen, MA, RPP
Partner

