



Zelinka Priamo Ltd.
LAND USE PLANNERS

PLANNING JUSTIFICATION REPORT

Rand Developments

415 Oxford Street West

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City of London

Official Plan Amendment and Zoning By-law Amendment

September 2024



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1.0 INTRODUCTION

Zelinka Priamo Ltd., on behalf of Rand Developments, is pleased to submit this Planning Justification Report in support of an application to the City of London to amend its Official Plan, The London Plan, and the City of London Zoning By-law to permit the redevelopment of the lands known municipally as 415 Oxford Street West (hereinafter referred to as the “subject lands”) for a 22-storey, multi-tower, high-rise, mixed-use development.

The purpose of this Planning Justification Report, in conjunction with an Urban Design Brief (under separate cover), is to evaluate the proposed Official Plan Amendment and Zoning By-law Amendment applications within the context of existing land use policies and regulations, including the Provincial Policy Statement, The London Plan (the City of London Official Plan, 2016), and the City of London Zoning By-law. This report should be read together with the accompanying Urban Design Brief.

This report concludes that the proposed Official Plan Amendment and Zoning By-law Amendment applications to permit the proposed development are appropriate and desirable for the following reasons:

- The proposed Official Plan Amendment and Zoning By-law Amendment are consistent with the policies of the 2020 Provincial Policy Statement and goals of The London Plan;
- The proposed Official Plan Amendment and Zoning By-law Amendment will permit a highly desirable use along a planned high-order transit route;
- The proposed development will make efficient use of underutilized lands within an emerging built-up area of the City;
- The proposed development will assist in achieving the mutually beneficial land use relationship of high-order rapid transit and high-density residential uses; and,
- The proposed development provides a well-functioning site design and built-form that is compatible with, and complementary to, the surrounding land uses.

2.0 SUBJECT LANDS

The subject lands are located on the north side of Oxford Street West, approximately 310m east of Proudfoot Lane and approximately 80m west of Beaverbrook Avenue (Figure 1). The subject lands are comprised of a single, square-shaped parcel with a lot area of approximately 3.8ha; a lot frontage of approximately 189.8m along Oxford Street West; and, a lot depth of approximately 202.5m. The subject lands abut vacant lands zoned for high-density residential development and open space uses to the north and east; Oxford Street West to the south; and, open space and commercial uses to the west. Land uses surrounding the subject lands generally consist of high-density residential, open space, and commercial uses. Notably, lands to the north, northeast, and east are proposed to be developed for a high-density residential subdivision. The intersection of Oxford Street West and Beaverbrook Avenue is to accommodate a future Rapid Transit Station. This development factors into the phasing and servicing for the subject lands.

The subject lands were formerly occupied by the Forest Glen Golf Centre, which consisted of a small golf course and mini-putt courses. As the former use has since ceased, the subject lands are currently vacant (see Images 1-2). Vehicular access to the lands is provided in the form of a concrete culvert bridge from Oxford Street West, shared with the lands to the west. Pedestrian sidewalks are located on both sides of the Oxford Street West right-of-way. Several public transit stops are located near the subject lands, providing connections throughout the city. Notably, and as mentioned above, the subject lands are within 100m of the future planned rapid transit station at the Oxford Street West and Beaverbrook Avenue intersection (see Image 3).

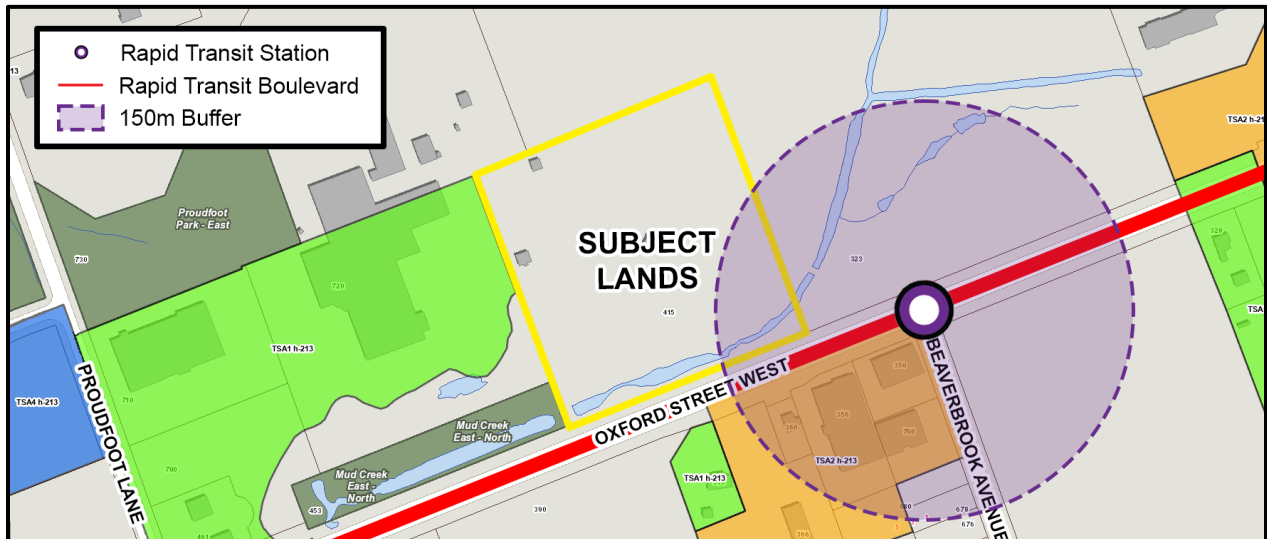
Image 1 – Aerial view of subject lands, looking northeast



Image 2 – Aerial view of subject lands, looking west



Image 3 – Location of subject lands proximate to future planned BRT stop



A segment of Mud Creek runs along the entire frontage of the subject lands, flowing from east to west. Mud Creek is planned to be realigned, as set out in the Mud Creek Environmental Assessment (Mud Creek EA). The realignment will shift the Mud Creek and Oxford Street West crossing to the east, resulting in the creek crossing under Oxford Street West approximately 40.0m west of the westerly limit of the subject lands, thereby retaining a functional frontage for

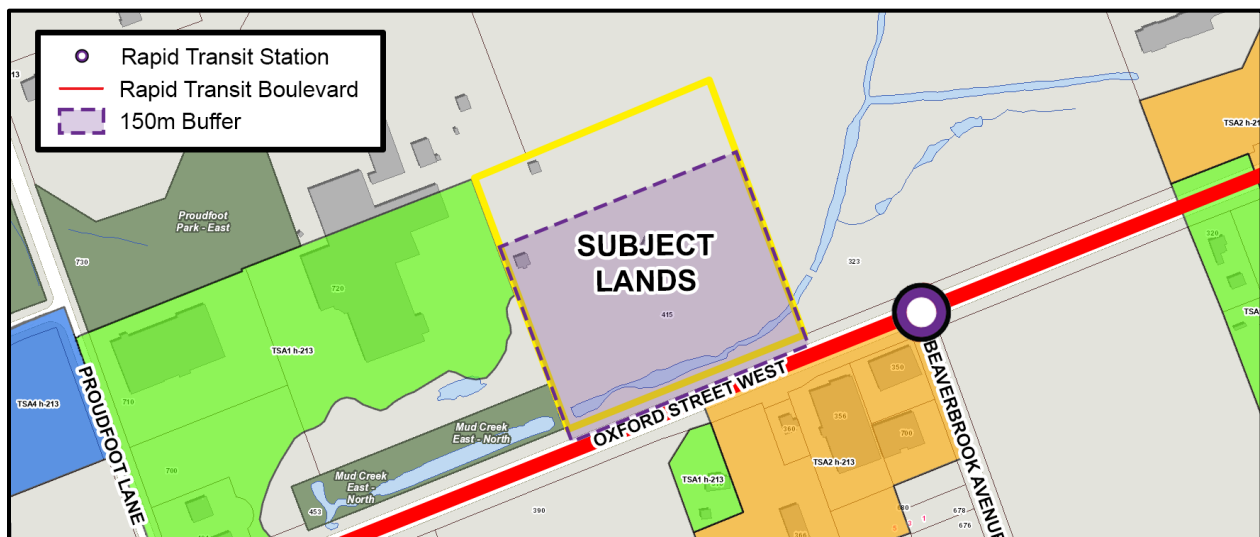
the lands on Oxford St West. The subject lands are identified as being within Phase 3 of the Mud Creek infrastructure works. This section is to be developer-led and developer-funded, with cost sharing in accordance with the Development Charges By-law. Phase 2, consisting of the implementation of a new Oxford Street culvert, removal of the existing Oxford Street culvert, cleanout of the Proudfoot Lane culvert, and channel realignment is currently in the detailed design phase, with construction having started in summer 2023 and lasting until approximately summer 2025.

Despite the location of Mud Creek between the developable portion of the subject lands and the future rapid transit corridor along Oxford Street West, the subject lands will retain both vehicular and pedestrian access to Oxford Street West, providing a direct link and meaningful frontage and interface with future rapid transit infrastructure. Specific proposed crossings of Mud Creek are identified later in this report.

The subject lands are within the “Neighbourhoods” and “Green Space” Place Types along a “Rapid Transit Boulevard” Street Classification in The London Plan; and, are split-zoned “Commercial Recreation (CR)” towards the northerly portion of the lands, and “Open Space (OS4)” towards the southerly portion of the lands in the City of London Zoning By-law Z.-1. The subject lands are also within the “Primary Transit Area”. A portion of the subject lands, associated with Mud Creek, are within the Upper Thames Region Conservation Area (UTRCA) regulated area.

A special policy area applies to the subject lands, which permits a variety of forms of housing with building heights of up to 12-storeys within 150m of Oxford Street West, and up to 4-storeys for lands beyond 150m of Oxford Street West (see Image 4). This special policy makes note of bonus zoning which is no longer applicable under the Planning Act.

Image 4 – Subject lands and 150m buffer from Oxford Street West





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FIGURE 1 - LOCATION

image retrieved from London City Map

**415 OXFORD ST OPA/ZBA
RAND DEVELOPMENTS
415 OXFORD STREET WEST
PT. LOT 14, CONCESSION C
GEO. TOWNSHIP OF LONDON
CITY OF LONDON
COUNTY OF MIDDLESEX**

3.0 SPATIAL ANALYSIS

3.1 Spatial Analysis and Neighbourhood Character

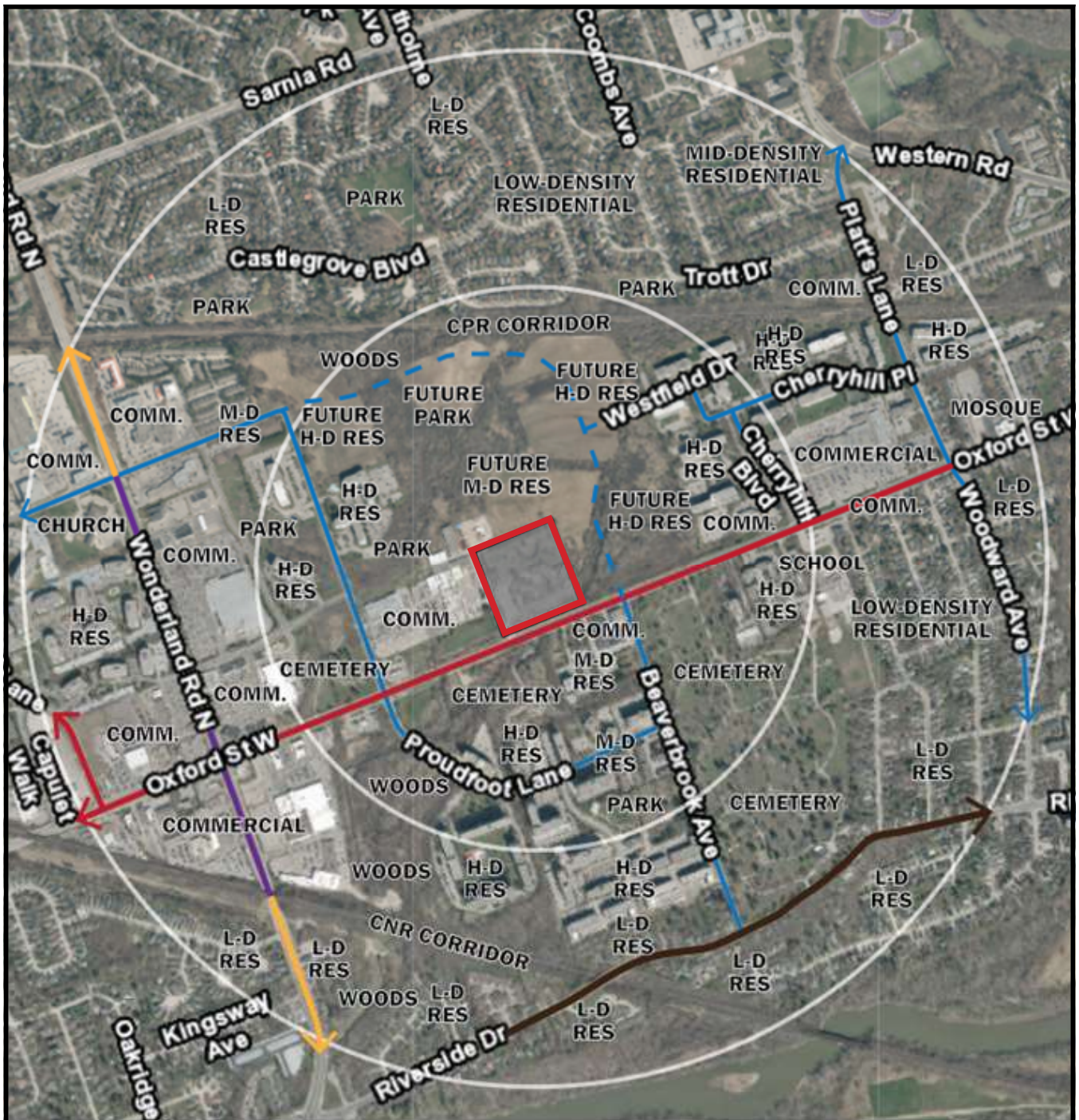
Figure 2 (following page) shows the subject lands, notable features, and land uses within 400m and 800m of the subject lands, representing walking distances of approximately 5 and 10 minutes, respectively, although the radii may not represent true walking times.

The coloured arrows shown in Figure 2 correspond to Map '3' – Street Classifications of the London Plan. Roads designated as “*Rapid Transit Boulevards*” are shown as red arrows, “*Main Streets*” are represented in purple, “*Urban Thoroughfares*” are shown in orange, “*Civic Boulevards*” in brown, and “*Neighbourhood Connectors*” in blue.

The subject lands front onto a designated “*Rapid Transit Boulevard*” (Oxford Street West) which provides two vehicular lanes in each direction as well as sidewalk and landscape boulevards on each side of the vehicle lanes (see Image 5). The London Plan describes this right-of-way as to be improved in the future with dedicated rapid transit lanes connecting the Oxford/Wonderland area to Fanshawe College via Downtown London. There are several existing public transit services operating within walking distance of the subject lands including the following conventional/mixed-traffic services: Route #17 (Byron Baseline at Griffith to Argyle Mall); Route #20 (Fanshawe College to Oakcrossing Gt at Oakcrossing Rd); Route #33 (Alumni Hall to Farrah at Proudfoot); Routes #51-54 (Weekly Community Buses); and, Express Route #91 (Capulet at Oxford to Fanshawe College Stop 1).

Image 5 – Aerial imagery of Oxford Street West, looking east





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FIGURE 2 - SURROUNDING CONTEXT

image retrieved from Google Earth

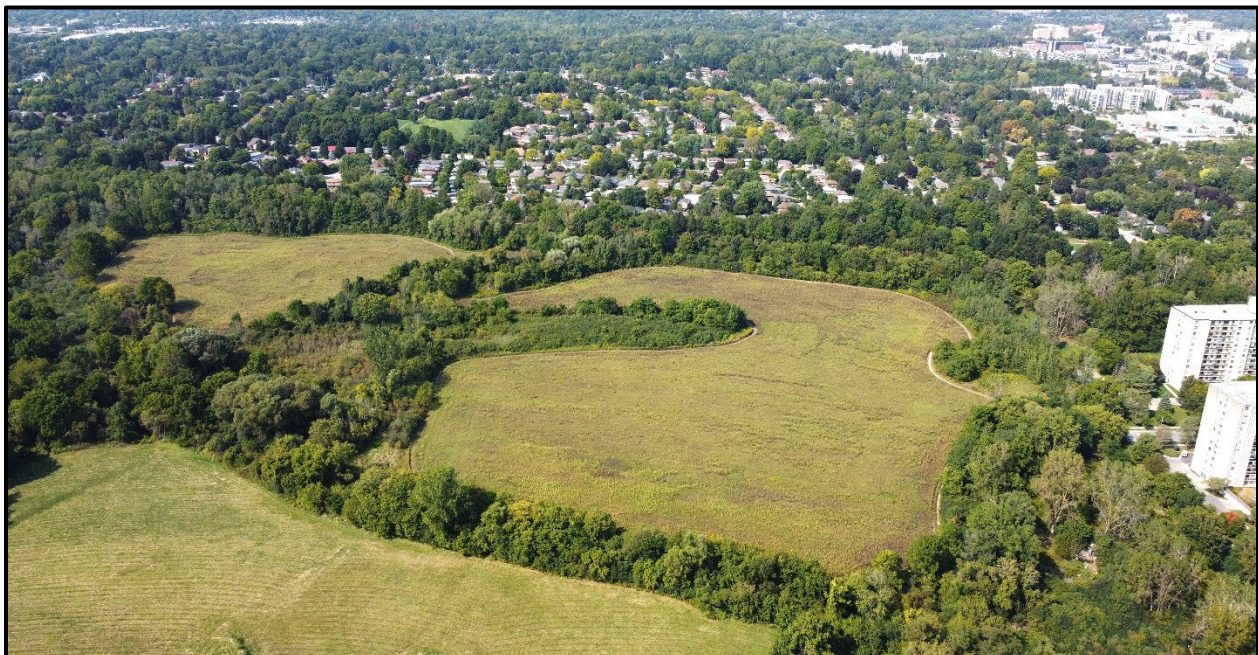
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Currently, the immediate area is developed for a variety of uses including high-density residential, multiple cemeteries, a regionally significant service/commercial centre, and large, continuous undeveloped areas/open space uses, primarily along the Mud Creek watercourse (see Images 6-7). Much of this undeveloped land, including the subject lands and parcels to the north, are designated for future mixed-use and residential development (including townhouses, mid-rise/high-rise apartments, and parkland/natural areas along Mud Creek) by Litera Group / ESAM. These lands are currently subject to multiple Planning Act applications to permit their development.

Image 6 – Aerial imagery, looking northwest from subject lands



Image 7 – Aerial imagery, looking northeast from subject lands



Lands within 400m of the subject lands are bisected by the east-west Oxford Street corridor. Undeveloped parcels north of this corridor are occupied by woodlands, meadows, and ravines. Developed parcels are used for high-density residential (up to 13-stories) along Proudfoot Lane and Cherry Hill Boulevard, as well as office, commercial recreation (including Fleetway Bowling), and logistics uses abutting to the west of the subject lands.

Lands south of Oxford Street West, opposite the subject lands, are developed for a similar mix of high-density residential and open space uses, as well as cemeteries and office uses at the intersection of Oxford Street and Beaverbrook Avenue. Apartment buildings in this area have heights ranging from ten to fourteen storeys in height.

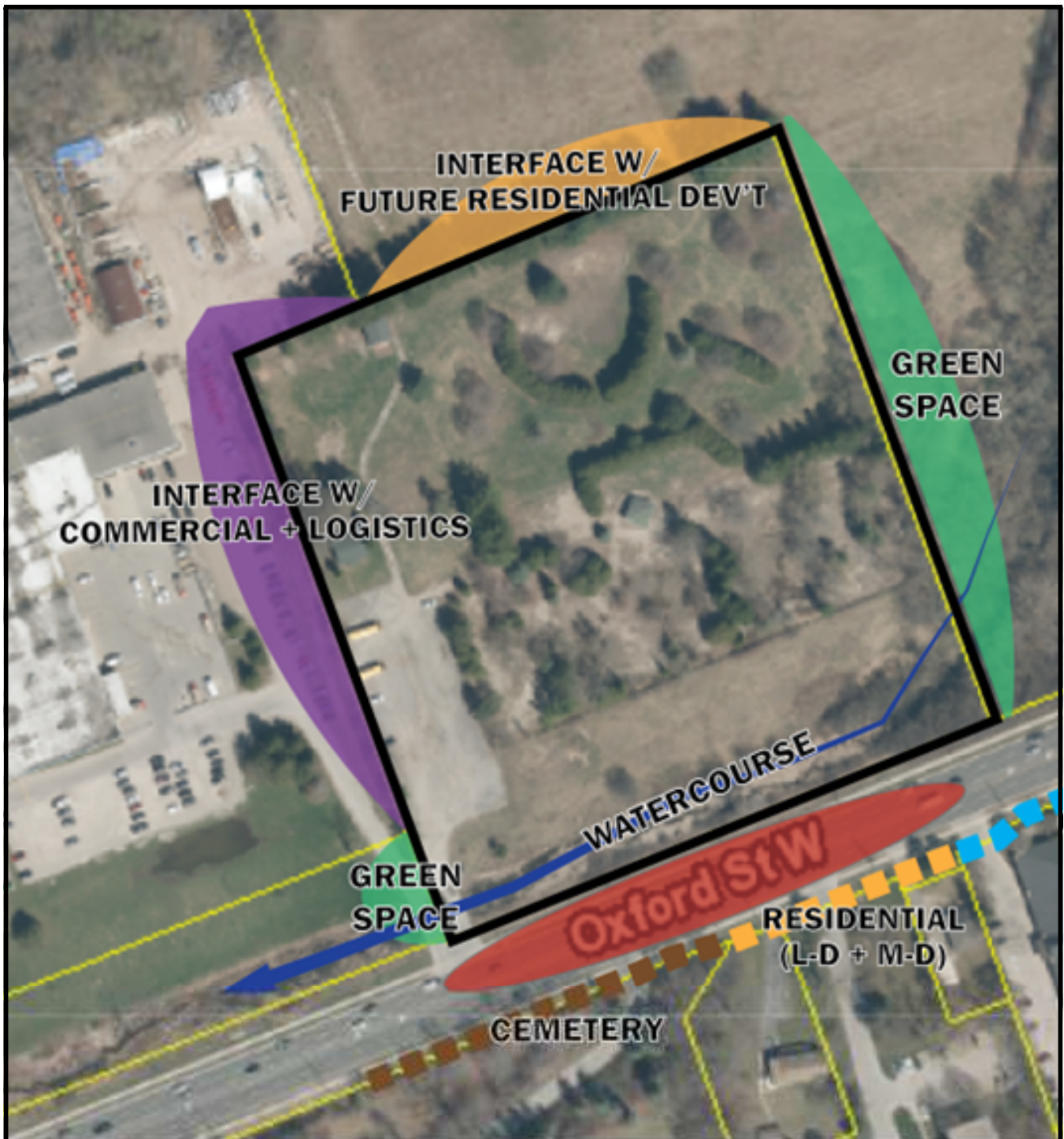
Areas beyond the 400m radius and within 800m of the subject lands are developed for a broader range of uses, including multiple food stores, public parklands, places of worship, and a public elementary school. The western quadrant, centred on the intersection of Wonderland Road and Oxford Street West, is developed for a range of commercial and high-density residential uses.

Notably, this area will be the western terminus of a future rapid transit service. Lands at the north of the 800m radius, beyond the CNR corridor, are comprised of low-density residential development as well as some neighbourhood parks. These areas are effectively disconnected from the subject lands by virtue of intervening future development and the CNR corridor itself. Areas to the east consist of commercial and institutional uses centred on Cherry Hill Mall (including a public library branch) and low-density residential areas south of the Oxford Street corridor. Finally, the southern quadrant is defined by the CPR corridor and Riverside Drive. Lands south of these corridors consist of wooded areas along the Thames River and low-density residential neighbourhoods, while areas to the north are mostly developed for higher-density residential uses (apartment towers) and the Mount Pleasant Cemetery.

The subject lands are located in a unique area of the City that exhibits a significant amount of undeveloped land with frontage along a future rapid transit route. The area exhibits a wide variety of land uses and a high degree of vehicular and pedestrian connectivity. Importantly, there are few, if any, truly sensitive uses immediately surrounding the subject lands that would be impacted by a significant development.

3.2 Site-Specific Spatial Analysis

The subject lands present an excellent opportunity for redevelopment and intensification given their proximity to existing high-density residential development, regionally significant commercial areas, public open space, and a variety of public infrastructure and servicing facilities (roads, public transit, schools, utilities). Site-specific development considerations are depicted on Figure 3 (following page).



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FIGURE 3 - SITE-SPECIFIC ANALYSIS

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The site's frontage along a designated "*Rapid Transit Boulevard*" (Oxford Street West) is shown in red, with a total width of 189.8m. This frontage will provide vehicular and pedestrian access to the subject lands (it is anticipated a new public access road may be introduced along the rear yard as part of the future comprehensive redevelopment of abutting parcels). Any redevelopment of the subject lands should enhance the Oxford Street West interface through quality site design, including landscape areas, active ground floor uses, and well-designed building elevations. Existing land uses south of Oxford Street West, opposite the subject lands, include a cemetery entrance (shown in brown), residential uses (orange), and commercial offices (light blue). These uses are generally compatible with a range of land uses currently permitted on the subject lands.

Under current conditions, the front yard (south) of the subject lands is occupied by a water course (Mud Creek), shown in blue. This feature continues to the east and west of the subject lands, passing through areas designated "*Green Space*" in the London Plan (shown in green). As set out in the Mud Creek Environmental Assessment (Mud Creek EA), this river channel is to be augmented and enhanced as part of a comprehensive channel re-alignment. It is anticipated that a 60m wide channel will be used along this section of Oxford Street, including new tree and vegetation plantings, re-graded channel slopes, and a multi-use trail along the north side of the channel, abutting the developable portion of the subject lands. Any proposed redevelopment of the subject lands must not disrupt the ecological function and integrity of this watercourse. Built elements must be sufficiently separated from top-of-bank areas.

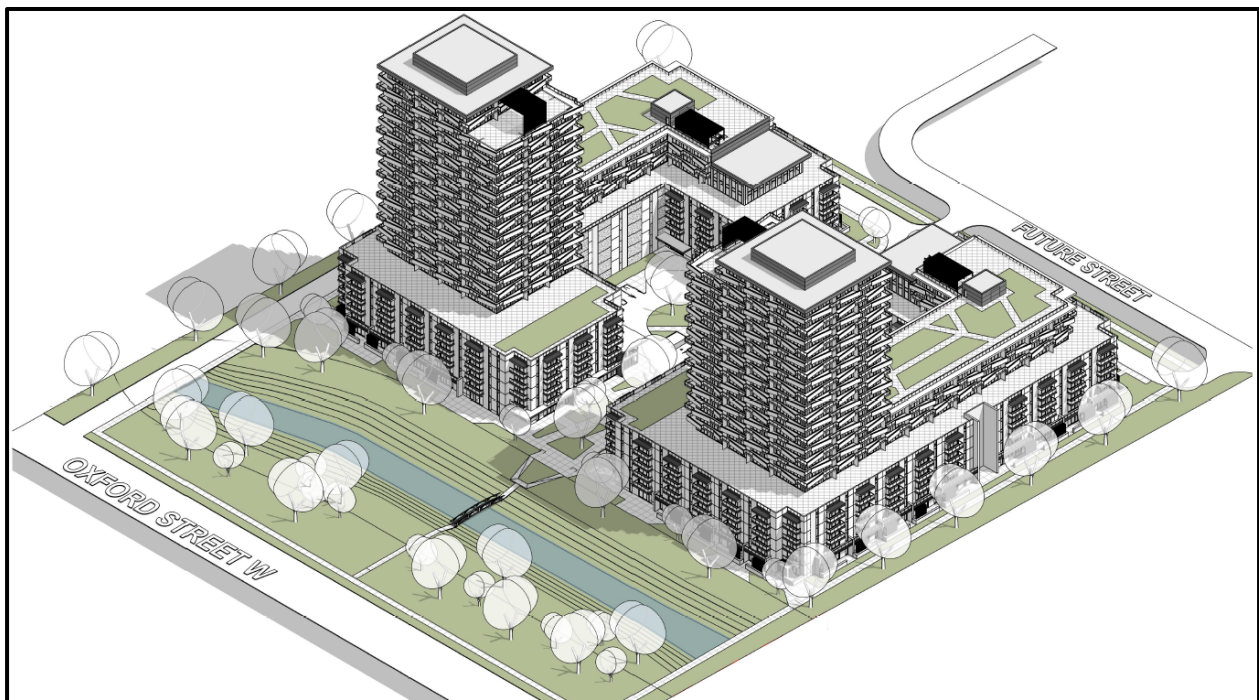
The (west) interior side lot line (and a portion of the rear lot line) interfaces with a Canda Post distribution centre and landscape design/maintenance centre, shown in purple on Figure 3. Any buildings proposed for the subject lands should be setback from these uses and screening elements should be provided as deemed necessary. Finally, the remainder of the rear yard interfaces with undeveloped lands designated under the "*Neighbourhoods*" Place Type that may be developed for cluster townhouse dwellings in the future. Any redevelopment of the subject lands should not negatively impact the future development potential of abutting parcels.

There are currently no sensitive land uses proximate to the subject lands that would be meaningfully impacted by the proposed development, save and except for several single detached dwellings on the south side of Oxford Street West, opposite the subject lands, which will likely be removed in the near future, given the proposed redevelopment of lands on the south side of Oxford Street West by others. Buildings of similar heights are permitted adjacent to the subject lands to the east, on the east side of the Mud Creek corridor.

4.0 PROPOSED DEVELOPMENT

The subject lands are proposed to be developed for two mixed-use buildings, each comprised of an 8-storey portion (north) and a 22-storey portion (south) (see Image 8). The proposed development consists of 704 residential dwelling units and approximately 750m² of retail area, equating to a mixed-use density of approximately 190uph (units per hectare) based on the current land area. However, once the Mud Creek channel lands are dedicated to the City of London (as described below), the mixed-use density will equate to approximately 280uph based on the eventual land area.

Image 8 – Conceptual 3D Massing Model of proposed development



Each of the two buildings consists of a C-shaped, 5-storey podium, with a central 8-storey tower above the podium, and a 22-storey tower towards the southerly portion of the building (nearest Oxford Street West). The development provides a gradual decrease in height from the Oxford Street West frontage. The 5-storey podium contains structured parking wrapped with dwelling units, resulting in a visual presentation of a residential apartment building on the exterior, while concealing the interior parking garage (see Image 9).

Image 9 – Conceptual rendering of 5-storey podium, looking south from Future Street



Minimal surface parking is proposed, with the majority of the parking being located within the 5-storey podium. A total of 724 vehicular spaces are proposed with a ratio of 1.03 spaces per unit. Bicycle parking is provided, with 630 long-term bicycle parking spaces, as well as 80 short-term bicycle parking spaces, for a total bicycle parking ratio of over 1 space per unit.

The proposed development provides an approximate 60m wide valley corridor between the proposed buildings and Oxford Street West. A 3.0m wide multi-use trail is proposed, in conjunction with the Mud Creek EA, to provide a pedestrian connection between the proposed development and Oxford Street West. Residents of the proposed development will be provided direct connections to the new Mud Creek corridor, and users of the corridor will be provided with the opportunity to access the pedestrian-oriented plaza included in the proposed development, fronting the multi-use trail. Uses envisioned for the plaza include restaurants (both dine-in and take-out), convenience commercial establishments (e.g. convenience store), and personal service establishments (e.g. barber shop, nail salon, spa). The co-location of the plaza and multi-use trail will provide a welcoming pedestrian-oriented frontage to the subject lands. Although conceptual at this time, it is envisioned that a pedestrian bridge be constructed to connect the multi-use trail to Oxford Street West (see Images 10-11).

Image 10 – Conceptual rendering of proposed development and multi-use trail



Image 11 – Conceptual rendering of proposed development and pedestrian bridge

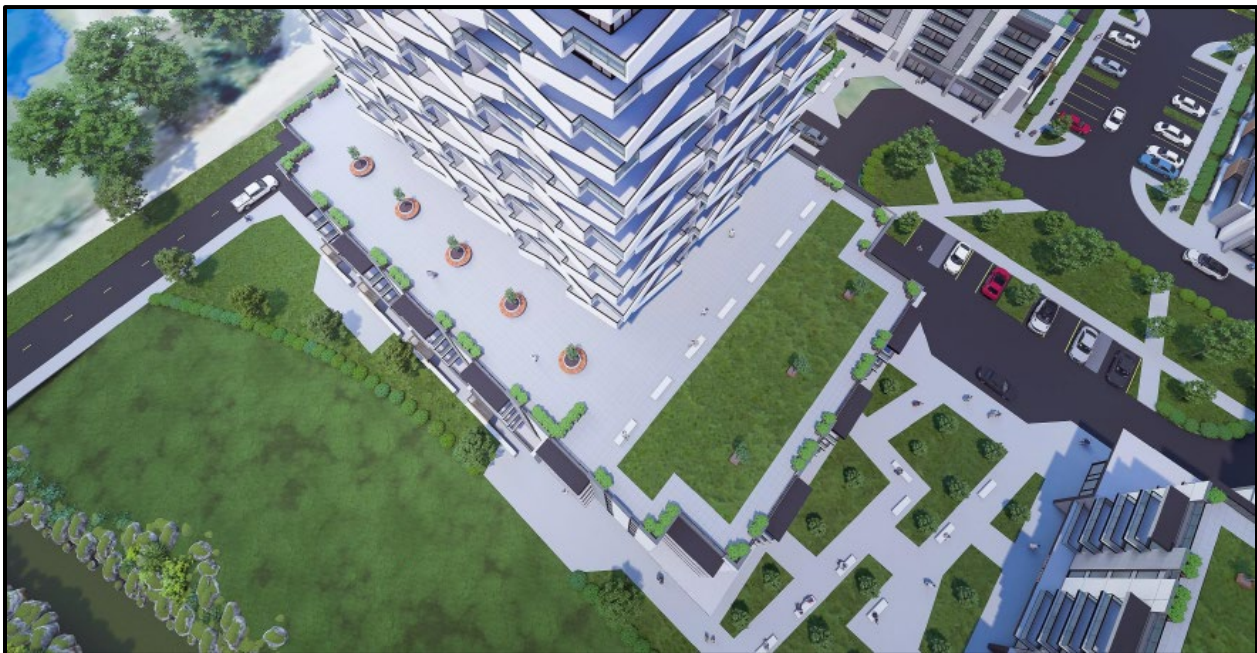


A variety of outdoor amenity spaces are provided on-site for resident use, including the landscaped plaza and courtyard, and amenity terraces at the sixth, ninth, and twenty-first storey of each building (see Images 12-13). Indoor amenity spaces are also proposed, including lounges (ground floor), multi-purpose rooms (sixth floor), and gyms (ninth floor).

Image 12 – Conceptual rendering of outdoor courtyard



Image 13 – Conceptual rendering of rooftop amenity area



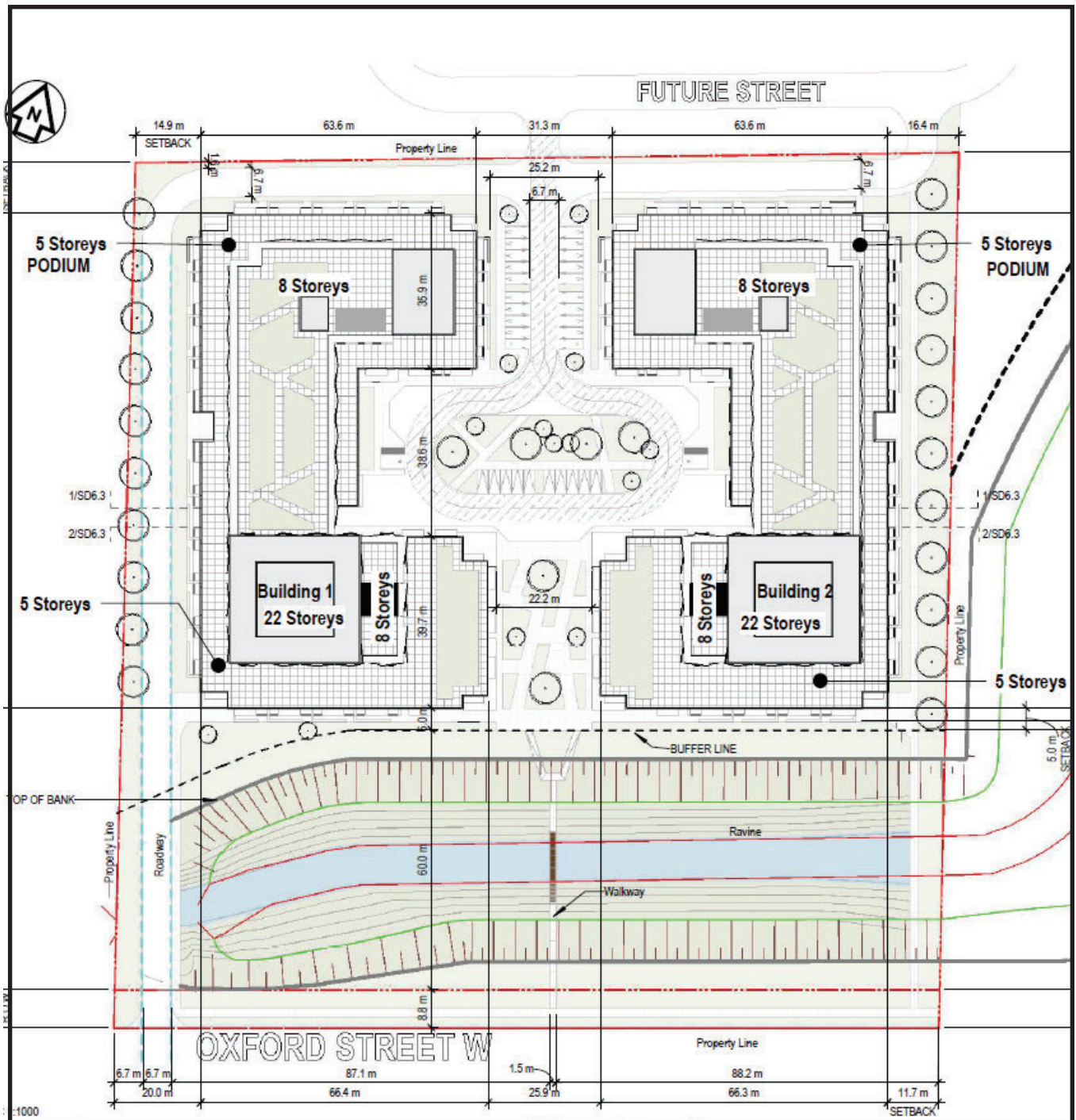
The proposed buildings are set back considerably from the street due to the eventual land dedication of the Mud Creek channel to the City of London (see Image 14). The buildings are designed to address the multi-use trail as well as the interface with the proposed development to the north. Pedestrian sidewalks connect the buildings internally, as well as provide connections to the lands to the north and Oxford Street West.

Image 14 – Conceptual rendering of proposed development, from Oxford St W



Vehicular access will be provided by two different access points: the existing bridge to Oxford Street West, converted to be right-in, right-out (RIRO) only, and from the lands to the north. This access arrangement has been discussed with both land-owners as well as City of London Planning and Transportation staff. While it is anticipated that most vehicular traffic will use the Oxford Street West access, the main, full-turns access will be from a future road to the north. The northerly access will also be considered the 'primary' access as it is free of any flood hazards.

A detailed analysis of the conceptual building design can be found in the Urban Design Brief prepared by Zelinka Priamo Ltd. and submitted as part of this application. However, in general terms, the proposed development shows notable architectural articulation and provides a distinct base, middle, and top. The Conceptual Site Plan (Figure 4) and renderings provide an overview of the proposed development.



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FIGURE 4 - CONCEPT PLAN
 prepared by Zedd Architecture

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4.1 Technical Studies

The proposed development is supported by the following technical reports.

4.1.1 Transportation Impact Assessment

Paradigm Transportation Solutions Ltd. was retained to complete a Transportation Impact Assessment (TIA) for the proposed development. The TIA includes an analysis of existing traffic conditions, a description of the proposed development, analysis of future traffic conditions, and assessment of development traffic impacts with recommendations as appropriate to accommodate the proposed development.

The conclusions of the TIA are as follows:

- **Base Year (2021) Traffic Conditions:** the intersections Oxford Street and Proudfoot Lane and at Oxford Street and Beaverbrook Avenue are operating at acceptable levels of service, and with no problem movements, except for the following critical movements at the Proudfoot Lane and Oxford Street intersection:
 - The 95th percentile queue length of the westbound right-turn movement is exceeding the existing storage of 25 metres during the AM and PM peak hours;
 - The 95th percentile queue length of the northbound left-turn movement is exceeding the existing storage of 40 metres during the PM peak hour; and,
 - The 95th percentile queue length of the southbound left-turn movement is exceeding the existing storage of 35 metres during the AM and PM peak hours.
- **Development Trip Generation:** the development is forecast to generate 155 and 219 trips during the AM and PM peak hours, respectively.
- **2035 Background Traffic Conditions:** the study area intersections are forecast to operate at similar levels of service as under base year traffic conditions, except for the following additional critical movements:

Proudfoot Lane and Oxford Street

- The 95th percentile queue length of the northbound left-turn movement is projects to exceed the existing storage of 40 metres during the AM peak hour;
- The westbound through movement is forecast to operate at LOS E with a v/c ratio greater than 1.00 during the PM peak hour; and,
- The southbound left-turn movement is forecast to operate at LOS F with a v/c ratio greater than 1.00 during the PM peak hour.

Beaverbrook Avenue and Oxford Street

- The westbound shared through/right-turn movement is forecast to operate at LOS C with a v/c ratio of 0.93 during the PM peak hour;
- The 95th percentile queue length of the northbound shared through/left-turn movement is projected to exceed the existing storage of 30 metres during the PM peak hour; and,

- The northbound right-turn movement is forecast to operate at LOS F with a v/c ratio of 0.90 during the PM peak hour.
- **2035 Total Traffic Conditions:** the study are intersections are forecast to operate at similar levels of service as under 2035 background traffic conditions during the AM and PM peak hours, except for the westbound movement at Beaverbrook Avenue and Westfield Drive, which is forecast to operate at LOS F with a v/c ratio of 0.92 during the PM peak hour. It is noted that the intersection is not yet constructed and is expect to be built concurrent with the development of the Beaverbrook Subdivision.
- **Site Access:** the site access intersection on the Future Street in the Beaverbrook Subdivision is forecast to operate at LOS A under 2035 total traffic conditions.
- **Restricted RIRO Access on Oxford Street:** The existing all-moves access on Oxford Street servicing the subject property and the property at 710-720 Proudfoot Lane, was reviewed for continuing as future RIRO access for the subject development and the Proudfoot Lane property. A RIRO vehicular access is operationally acceptable and feasible for implementation. It will also have the benefit of providing direct active transportation access to the subject development from Oxford Street, including the future BRT system.

Based on the findings and conclusions of the TIA, it is recommended that the development be considered for approval as proposed.

4.1.2 Tree Preservation Report

MTE Consultants Inc. was retained to complete a Tree Preservation Plan (TPP) in support of the proposed applications. The report begins to address the requirements set forth by the City of London and evaluates the potential for tree preservation. It is noted that a grading plan will be developed through a future Site Plan Approval (SPA) application, and as such, the TPP is conceptual and subject to confirmation based on the future detailed grading plans. In advance of the site design and grading plan finalization, preliminary recommendations include removal of trees within the subject lands; potential preservation of boundary trees; and, removal of trees in poor health.

4.1.3 Environmental Impact Study

NRSI was retained to complete a focused Environmental Impact Study (EIS) for the subject lands. The lands are located within Ecoregion 7E, and are within the Thames River watershed and Mud Creek Subwatershed. Mapping in The London Plan identifies Significant Valleylands and a watercourse (Mud Creek) within the subject lands, and small wetland pockets, woodland and unevaluated vegetation patches within adjacent lands. Based on The London Plan, any development within or adjacent to the identified significant features outlined requires the preparation of an Environmental Impact Study (EIS).

The majority of the subject property is characterized by mown grass and landscaped grounds with a cultural woodland in the central area of the property. The Significant Valleyland is dominated by cultural meadow with a cattail marsh and thicket swamp immediately adjacent to Mud Creek. Mud

Creek is the main drainage feature on the property with no other defined drainage areas. The proposed development is contained within the former Forest Glen Golf Centre, which does not include the 60m wide Significant Valleyland corridor and Mud Creek. This section of the Mud Creek Valleyland Corridor along Oxford St. W. is slated to be realigned during the Phase 4 realignment, which is to be completed by developers, sometime after 2024.

The EIS was prepared to demonstrate that the proposed development is compatible with the future plans for Significant Valleylands on the subject lands and that there will be no net impact on the Natural Heritage System (NHS), Species at Risk (SAR), Significant Wildlife Habitat (SWH), and restoration works required for the Significant Valleylands buffer.

A Net Effects Assessment was completed for the proposed development which considers the source of the impacts, potential areas affected, and potential effects. Avoidance, mitigation, and compensation measures were identified and the overall net effects and rationale provided. As demonstrated in the Net Effects Assessment table included within the report, assuming the recommended avoidance, mitigation, and compensation measures are implemented properly, no significant negative impacts on the natural features or on their ecological functions should occur.

4.1.4 Preliminary Servicing Report

LDS Consultants Inc. (LDS) was retained to prepare a Preliminary Servicing Report (PSR) that meets the City of London's site plan conditions for the proposed development on the subject lands. The PSR analyzes sanitary servicing, water servicing, stormwater management and servicing, as follows:

- **Proposed Sanitary Servicing Plan and Phasing:** The construction schedule for the realignment of Mud Creek on the subject lands limits the phasing of the proposed infrastructure. Servicing is also restricted by the downstream capacity constraints imposed by the Oxford Street trunk sewer. A holding provision of adequate capacity and connection to a municipal outlet will need to be issued for this application. As such, local servicing works should be constructed in parallel with the construction of the Mud Creek Channel realignment.
- **Proposed Water Servicing:** A 250mm diameter watermain fronting the south side of the subject lands is located within the Oxford Street right-of-way, and is also planned for the future as part of the Beaverbrook Subdivision. The proposed development will connect to both existing and future watermains.
- **Proposed Stormwater Management:** The internal storm sewer implemented as part of the proposed development will convey runoff generated on-site to Mud Creel.

The analyses and results described in the PSR demonstrate that stormwater management, sanitary servicing, and water supply infrastructure can adequately service the proposed development. A summary of the proposed conditions and recommendations are as follows:

- The drainage outlet for the development is Mud Creek on the property's southern portion. The proposed Mud Creek Valley realigns the existing Mud Creek that traverses the site. The corridor is parallel to Oxford Street West and has a width of 61.3 to incorporate requirements for regulatory flood conveyance and natural heritage features.
- The SWM strategy outlined herein supports the development and focuses on targets for peak flow discharge and quantity storage, water quality, and the annual water balance. The SWM design includes PPS controls on site. The proposed servicing plan includes headwall locations and a preliminary underground storage layout plan to help safely convey runoff from the proposed development into the Mud Creek Valley.
- Municipal servicing plans were developed based on the site plan and existing infrastructure.
- An implementation strategy for the proposed works will be similar to the one proposed for the Beaverbook Subdivision, but will require future consultation with the City of London.

5.0 PROPOSED APPLICATIONS

As the proposed development is not contemplated under the current Official Plan policies or permitted under the current *CR* zone, an Official Plan Amendment and Zoning By-law Amendment are required to permit the development.

5.1 Official Plan Amendment

The proposed Official Plan Amendment seeks to amend the existing site-specific policy within the *Neighbourhoods* Place Type to permit a maximum building height of 22-storeys, where a maximum height of 12-storeys is currently permitted, and to permit apartment buildings within the entirety of the subject lands. It may be appropriate to include a site-specific policy noting that the 22-storey height is permitted within a certain distance of the Oxford Street West right-of-way, with a maximum building height of 8-storeys being permitted beyond that point.

5.2 Zoning By-law Amendment

The portion of the subject lands proposed for redevelopment are zoned “*Commercial Recreation (CR)*”, which provides for and regulates primarily indoor commercial recreational uses which are located outside of the floodway and flood fringe. The *CR* zone permitted the former Forest Glen Golf Centre.

The proposed Zoning By-law Amendment seeks to re-zone the portion of the subject lands zoned “*Commercial Recreation (CR)*” to a site-specific, special regulation “*Residential (R10-3(_))*” and “*Community Shopping Area (CSA1)*” compound zone, with site-specific special provisions as follows:

- Minimum lot frontage required on an arterial street of 0.0m;
- Minimum front yard setback of 11.0m;
- Minimum interior side yard setback of 11.0m;
- Minimum rear yard setback of 5.0m;
- Maximum lot coverage of 50%; and,
- Maximum density of 280uph*.

*While the overall density of the proposal is 277uph, the density regulation has been rounded up to provide a minimal level of flexibility should unit sizes or retail floor area change. However, as there is no mechanism to regulate density on a units per hectare basis in The London Plan, it may be appropriate to remove the uph regulation entirely.

At this time, no other special regulations have been identified as necessary; however, additional special regulations may be identified through the planning process.

Holding provisions will be applied to the subject lands until such time that the Mud Creek infrastructure works are complete; and, the northerly lands are developed which will provide the proposed development with the primary vehicular access and municipal servicing.

6.0 POLICY ANALYSIS

The following sections of this report provide analysis on the proposed development and associated Official Plan Amendment and Zoning By-law Amendment applications with respect to applicable policy and regulatory documents.

6.1 Provincial Policy Statement, 2020

The Provincial Policy Statement (PPS), issued under the authority of Section 3 of the Planning Act, “provides policy direction on matters of provincial interest related to land use planning” in order to ensure efficient development and protection of natural resources. All planning applications, including Official Plan and Zoning By-law Amendment applications, are required to be consistent with these policies.

The policy analysis describing how the proposed application is consistent with the stated policies within the PPS is detailed in the table below.

Provincial Policy Statement (2020) Policy Analysis Table	
<i>Policy</i>	<i>Response</i>
<p><u>Section 1.1.1 Managing and Directing Land Use [...]</u></p> <p>Healthy, liveable 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 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; 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>The proposed development is an efficient and appropriate form of intensification for the subject lands, and will add to the range and mix of residential uses to help satisfy the long-term housing needs identified in the City of London.</p> <p>The proposed development is a compact and cost-effective form that is anticipated to utilize municipal services when they become available within an existing built-up area of the City. Thus, the consumption of land and servicing costs are minimized.</p> <p>The subject lands are a suitable location for the proposed development, being directly along the future planned Bus Rapid Transit (BRT) route. The proposal to increase the density on the subject lands makes good use of the anticipated BRT investment.</p>

<p><u>Section 1.1.3.1 Settlement Areas</u> Settlement areas shall be the focus of growth and development.</p>	<p>The subject lands are located within a settlement area, being within the City of London.</p>
<p><u>Section 1.1.3.2 Settlement Areas</u> Land use patterns within settlement areas shall be based on densities and a mix of land uses which:</p> <ul style="list-style-type: none"> a) efficiently use land and resources; b) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion; e) support active transportation; f) are transit-supportive, where transit is planned, exists or may be developed; 	<p>The proposed development broadens the range of residential forms and intensities in the immediate area, and compliments the range and intensities of mixed forms in the greater surrounding area. It makes efficient use of underutilized land, resources, infrastructure, and existing transportation networks by increasing the density (uph) on the subject lands. It is anticipated that infrastructure capacity will become available once the northerly lands are developed, to adequately service the subject lands through full municipal services. The subject lands are serviced by existing pedestrian sidewalks via the Oxford Street West right-of-way, and will be serviced by the future multi-use trail within the Mud Creek corridor, supporting the use of active transportation; and, are situated along existing transit routes as well as the future planned BRT route, supporting existing and future transit opportunities.</p>
<p><u>Section 1.1.3.3 Settlement Areas</u> Planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.</p>	<p>The subject lands are located in a unique area of the City that exhibits a significant amount of undeveloped land with frontage along a future rapid transit route. The area exhibits a wide variety of land uses and a high degree of vehicular and pedestrian connectivity.</p> <p>The subject lands are an appropriate location for the proposed development, with good access to existing and emerging public transit services. The subject lands are generally within walking distance to public services, amenities, and green spaces.</p>
<p><u>Section 1.1.3.4 Settlement Areas</u> Appropriate development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety.</p>	<p>The proposed development will utilize zoning regulations that are generally applied to this level of intensification, including appropriate building setbacks and parking. The proposed special zoning provisions relating to building height and density achieve an intense form of compact development, and are supported by the applicable land use policies and technical studies provided. There are no risks to public health and safety from the proposed development.</p>
<p><u>Section 1.1.3.6 Settlement Areas</u> New development taking place in designated growth areas should occur adjacent to the existing built-up area and should have a compact form, mix</p>	<p>The proposed development is within an existing built-up area. The proposed density of 280uph is reflective of a compact and efficient form of housing which adds to the mix of uses and densities in this</p>

<p>of uses and densities that allow for the efficient use of land, infrastructure and public service facilities.</p>	<p>unique area of the City that can accommodate significant growth without negative impacts to sensitive land uses.</p>
<p style="text-align: center;"><u>Section 1.4.3 Housing</u></p> <p>Planning authorities shall provide for an appropriate range and mix of housing types and densities to meet projected requirements of current and future residents of the regional market area by:</p> <ul style="list-style-type: none"> b) permitting and facilitating: <ul style="list-style-type: none"> 2. all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3; 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; d) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed; e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations; and, f) establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety. 	<p>The proposed development contributes to the range and mix of housing types to accommodate future growth in the City of London, and is consistent with the policy intent to encourage appropriate intensification.</p> <p>As discussed in more detail later in this report, this proposed development is considered appropriate intensification as it takes advantage of existing and emerging infrastructure and public services; establishes a high-density use along a high-order road; makes good use of underutilized land; supports the use of existing and emerging active transportation and public transit routes; contributes to housing supply; and, has a compact and cost-effective built form.</p> <p>Residential apartments can provide a more affordable type of housing and the proposed development offers a wide range of unit types and sizes which will contribute to the range of housing affordability in this part of the City of London.</p>
<p style="text-align: center;"><u>Section 1.6.6.2 Sewage, Water and Stormwater</u></p> <p>Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services.</p>	<p>The proposed development will make full use of municipal services as they are constructed to support the development.</p>
<p style="text-align: center;"><u>Section 1.6.7.4 Transportation Systems</u></p> <p>A land use pattern, density and mix of uses should be promoted that minimize the length and number</p>	<p>The proposed development, being situated along an emerging high-order transit route and multi-use trail, encourages the use of active and public transportation.</p>

of vehicle trips and support current and future use of transit and active transportation.	
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Given the above, the proposed development and associated Official Plan Amendment and Zoning By-law Amendment applications conform to the 2020 Provincial Policy Statement.

6.2 The City of London 2016 Official Plan

The 2016 Official Plan (The London Plan) is the policy framework for all planning in London. It emphasizes growing inward and upward to reduce the costs of growth, creating walkable communities, revitalizing urban neighbourhoods and business areas, protecting farmlands, and reducing greenhouse gases and energy consumption. At the root of The London Plan is the goal of building a city that will be attractive as a place to live and invest in a highly competitive world and one that will offer the opportunity of prosperity to everyone. A strong and recurring theme of the Plan is to encourage appropriate intensification and redevelopment, specifically along planned high-order transit routes.

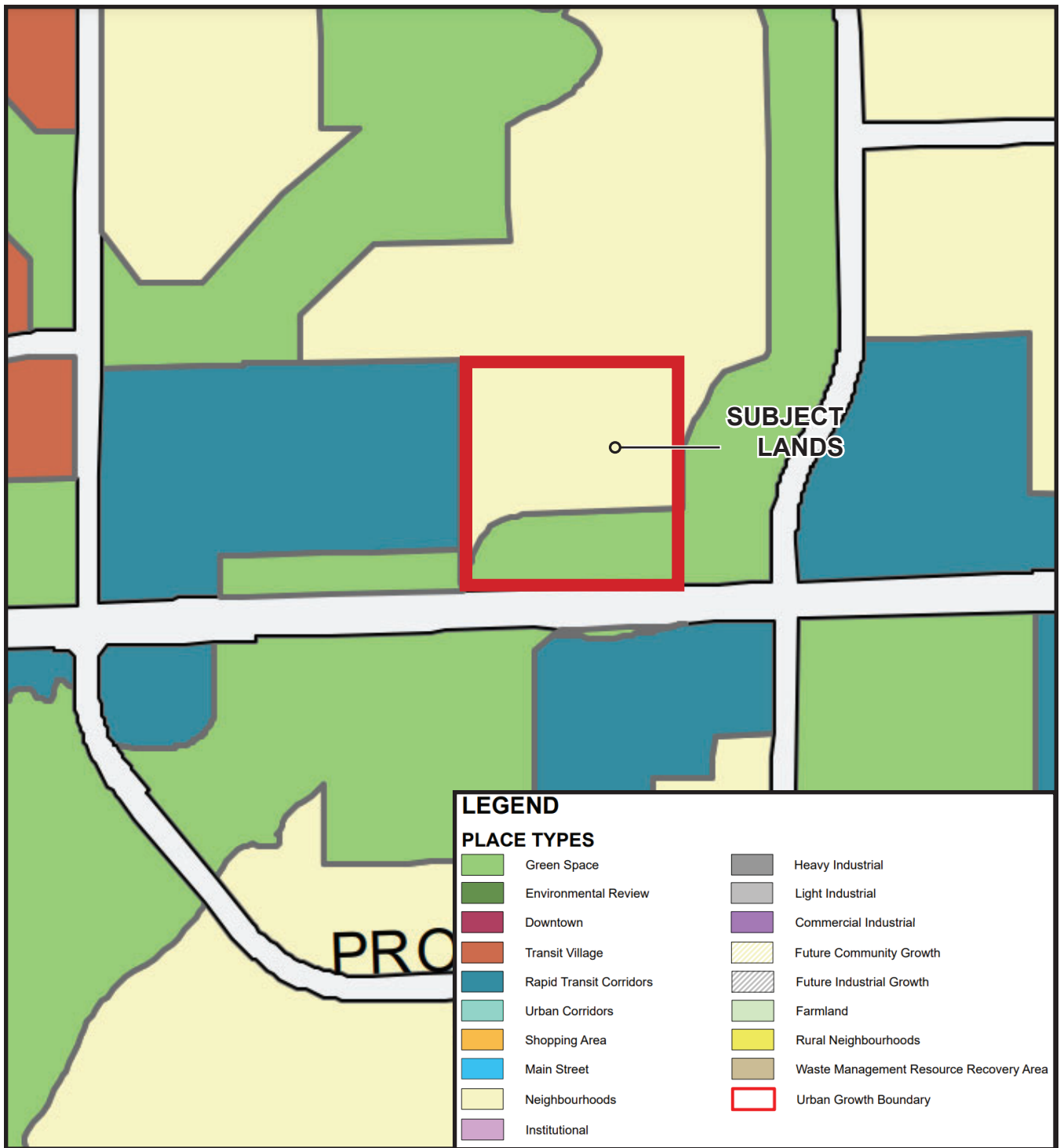
The subject lands are identified as within the “Neighbourhoods” and “Green Space” Place Types in The London Plan (Figure 5) along a “Rapid Transit Boulevard” street classification (Figure 6).

The *Green Space* Place Type applies to the first ~60.0m of depth of the subject lands from the Oxford Street West frontage, associated with the Mud Creek channel. No development is contemplated within these lands, with the exception of a multi-use pathway to be developed by the City, and the reconstruction of the existing vehicular access to the subject lands from Oxford Street West.

The remaining lands are within the *Neighbourhoods* Place Type, with a site-specific policy which states:

“A broad range of residential dwelling types including townhouses, stacked townhouses, back-to-back stacked townhouses, and apartment buildings are permitted. Residential buildings with a maximum height of 8-storeys may be permitted within 150 metres of the Oxford Street West right-of-way. Buildings within 150 metres of the Oxford Street right-of-way shall have their primary entrances and orientation toward Oxford Street West. Bonus zoning up to a maximum of 12-storeys may be permitted within 150 metres of the Oxford Street West right-of-way where the site plan and building design mitigate the impacts of the additional height. Beyond 150 metres from the Oxford Street West right-of-way in the Neighbourhoods Place Type, townhouses, stacked townhouses, and back-to-back stacked townhouses with a maximum height of 4-storeys are permitted.”

As bonus zoning is no longer permitted under the Planning Act, the 12-storey maximum is considered to be the “upper-maximum” height permitted on the subject lands, as confirmed with City staff.



Project No.: RND/LON/23-01

Date: JUNE 2024

Scale: NTS



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FIGURE 5 - THE LONDON PLAN

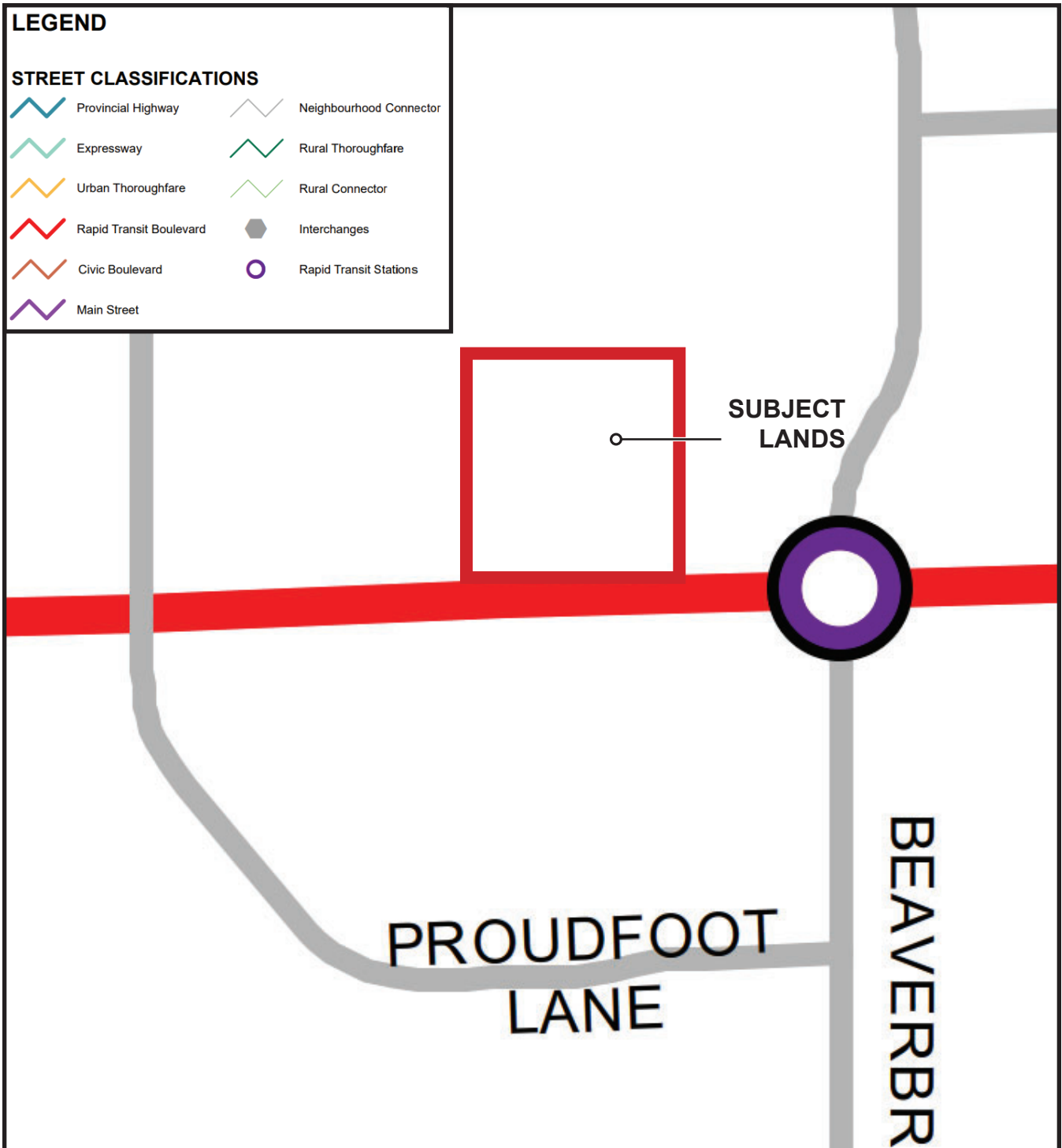
Map 1: Place Types

415 OXFORD ST OPA/ZBA
RAND DEVELOPMENTS
 415 OXFORD STREET WEST
 PT. LOT 14, CONCESSION C
 GEO. TOWNSHIP OF LONDON
 CITY OF LONDON
 COUNTY OF MIDDLESEX

LEGEND

STREET CLASSIFICATIONS

- | | |
|---|---|
|  Provincial Highway |  Neighbourhood Connector |
|  Expressway |  Rural Thoroughfare |
|  Urban Thoroughfare |  Rural Connector |
|  Rapid Transit Boulevard |  Interchanges |
|  Civic Boulevard |  Rapid Transit Stations |
|  Main Street | |



Project No.: RND/LON/23-01

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Zelinka Priamo Ltd.
LAND USE PLANNERS

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FIGURE 6 - THE LONDON PLAN

Map 3: Street Classification

**415 OXFORD ST OPA/ZBA
RAND DEVELOPMENTS
415 OXFORD STREET WEST
PT. LOT 14, CONCESSION C
GEO. TOWNSHIP OF LONDON
CITY OF LONDON
COUNTY OF MIDDLESEX**

This portion of Oxford Street West is designated as a *Rapid Transit Boulevard* Street Classification, and is planned to contain a higher-order form of public transit in the future (Bus-Rapid Transit). As noted above, a rapid transit station is to be located at the intersection of Oxford Street West and Beaverbrook Avenue, approximately 80m to the east of the subject lands. This station will be within easy and quick walking distance from the proposed apartment buildings. The proposed pedestrian bridge over the Mud Creek channel connects the proposed development to Oxford Street West, which is intended to serve as an efficient method of getting future residents of the subject lands, and other users of the public multi-use trail within the Mud Creek channel, to the rapid transit stop.

The following table contains a policy analysis detailing how the proposed development conforms with The London Plan:

The London Plan (2016) Policy Analysis Table	
<i>Policy</i>	<i>Response</i>
<p><u>Section 193 What are we trying to achieve?</u> In all of the planning and development we do and the initiatives we take as a municipality, we will design for and foster:</p> <ol style="list-style-type: none"> 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. 	<p>The proposed development conforms to these goals by providing a development that:</p> <ul style="list-style-type: none"> • Introduces a new range of unit sizes, layouts, and housing types to the immediate area; • Provides high-quality urban design features to promote compatibility; • Establishes residential densities which are appropriate to the neighbourhood and result in compact development; and, • Incorporates multi-unit residential development in an area appropriate for intensification. <p>The subject lands are well-suited to accommodate the proposed development and can contribute to expanding the range of housing forms and tenures to meet current and future demand for housing in the area.</p> <p>The inclusion of a range of residential unit sizes supports the intent of providing housing choice for residents in the area that is otherwise primarily dominated by commercial and industrial uses.</p> <p>The proposed development significantly contributes to the future neighbourhood character by providing an active frontage along the future multi-use pathway within the Mud Creek channel. Users of the public space will have the opportunity to access the proposed small-scale commercial uses within the development.</p>
<p><u>Section 197 Character</u> The built form will be designed to have a sense of place and character consistent with the planned</p>	<p>The proposed development will respect the existing physical character of the surrounding area</p>

<p>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.</p>	<p>by providing a built-form that is contextually appropriate, given the planned adjacent subdivision development and planned high-order transit route, and high-quality building design that is aesthetically pleasing.</p>
<p>Section 202 Character Buildings and public spaces at key entry points into neighbourhoods will be designed to help establish a neighbourhood's character and identity.</p>	<p>The proposed high-rise residential building will be designed to a high standard of architectural quality and urban design to create strong built-form edges for the development of the wider neighbourhood.</p>
<p>Section 205 Character Public art should be integrated into public spaces such as streets, parks, squares and forecourts, and on the property of public institutions and facilities to help establish character and sense of place.</p>	<p>The design and layout of the proposed development allows for the consideration of public art. However, public art is not proposed as part of the development at this time.</p>
<p>Section 256 Site Layout Buildings should be sited so that they maintain and reinforce the prevailing street wall or street line of existing buildings. Where a streetscape has not been built out, building should be sited with regard for the planned street wall or line.</p>	<p>The subject lands are unique in that they are setback considerably from the Oxford Street West right-of-way due to the Mud Creek channel. As such, it is not physically possible to site the building as to continue a street wall. However, the buildings have been appropriately designed to address the eventual multi-use trail.</p>
<p>Section 275 Parking To reduce the visual impact of parking, make efficient use of land, to provide for outdoor amenity space, and promote active uses on street-facing façades, parking for large buildings, such as high-rise residential buildings, office buildings, and mixed-use buildings should be located underground or integrated within the building design.</p>	<p>The proposed development provides servicing and loading facilities integrated into the building to minimize visual impact. The utilization of parking integrated within the building minimizes the need for surface parking.</p>
<p>Section 286 Buildings Buildings should be designed to achieve human-scale relationships that are comfortable for pedestrians.</p>	<p>The tower-over-podium built-form provides a pedestrian oriented interface to ensure the buildings are designed according to a human-scale. A 5-storey podium, as proposed, is generally considered to be sufficient in achieving a human-scale relationship.</p>
<p>Section 289 Buildings 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.</p> <ol style="list-style-type: none"> 1. The base should establish a human-scale faced 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 roof or a cornice treatment, to hide and integrate 	<p>The proposed high-rise residential building clearly delineates the base, middle, and top of the building through the use of step backs and architectural materials.</p> <p>The proposed development is capable of providing pedestrian scaled lighting to illuminate common spaces, sidewalks, and pedestrian areas, while minimizing light pollution. The design, colour, location, and illumination intensity will be coordinated appropriately for the character and palette of the area. A consistent approach to street lighting will be provided.</p>

<p>mechanical penthouses into the overall building design.</p>	
<p><u>Section 293 Buildings</u> 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.</p>	<p>The development proposes a slender tower floorplate of approximately 970m² and a height of 22-storeys. Although the proposed height exceeds heights of established development in the area, it is not anticipated that 22-storeys will have an adverse impact on any significant views considering the significant setback from the street.</p> <p>Notably, the proposed Beaverbrook subdivision proposes heights of up to 18-storeys. At the time that this proposed development is built, the 22-storey height will be complementary to the building heights on the adjacent lands.</p>
<p><u>Section 295 Buildings</u> Residential and mixed-use buildings should include outdoor amenity spaces.</p>	<p>Common amenity space will be provided through outdoor terraces, rooftop patios, and a centrally-located courtyard. Amenity space will also be provided to residents through the use of private balconies and patios. Further details relating to the design of amenity area components such as screening, fencing, planting, and landscaping will be refined through the future Site Plan Approval process.</p>
<p><u>Section 918 Vision</u> We will realize our vision for the Neighbourhoods Place Type by implementing the following in all the planning we do and the public works we undertake:</p> <ol style="list-style-type: none"> 5. Mixed-use and commercial uses will be permitted at appropriate locations within neighbourhoods to meet the daily needs of neighbourhood residents. 12. Neighbourhoods will be designed to protect the Natural Heritage System, adding to neighbourhood health, identity and sense of place. 13. Intensification will respect existing neighbourhood character and offer a level of certainty, while providing for strategic ways to accommodate development to improve our environment, support local businesses, enhance our physical and social health, and create dynamic, lively, and engaging places to live. 	<p>The proposed development provides small-scale commercial spaces fronting along the future multi-use trail within the Mud Creek corridor. This provides both the residents of the development and the greater community with the opportunity to take advantage of the commercial spaces.</p> <p>The proposed development is designed with consideration for the City's planned infrastructure works through the Mud Creek corridor. The 60.0m channel will ultimately be dedicated to the City and will be City-owned and managed.</p> <p>The existing neighbourhood character on the north side of Oxford Street West primarily consists of low-rise commercial uses and future-planned high-rise residential uses. The proposed development is compatible with, and complementary to, these uses.</p> <p>The subject lands present a unique opportunity for redevelopment due to the integration of the Mud Creek channel. The Thames Valley Parkway (TVP)</p>

	<p>is generally considered to be one of the City of London’s greatest public assets. Although the Mud Creek channel corridor is much smaller in scale to the TVP, there is opportunity to utilize it in a similar fashion. The proposed development, in conjunction with the adjacent Beaverbrook subdivision, provides hundreds of dwelling units and potential users of the future multi-use trail within the Mud Creek channel. The proposed development provides significant opportunity to make full use of the City’s significant investment of the channel.</p>
<p>Section 953 Urban Design Considerations for Residential Intensification</p> <p>The City Design policies of this Plan will apply to all intensification proposals. In addition, the following design policies will apply:</p> <ol style="list-style-type: none"> 2. Compatibility and fit, from a form perspective, will be evaluated based on such matters as: <ol style="list-style-type: none"> a. Site layout within the context of the surrounding neighbourhood, considering such things as access points, driveways, landscaping, amenity areas, building location, and parking. b. Building and main entrance orientation. c. Building line and setback from the street. d. Character and features of the neighbourhood. e. Height transitions with adjacent development. f. Massing appropriate to the scale of the surrounding neighbourhood. 3. The intensity of the proposed development will be appropriate for the size of the lot such that it can accommodate such things as driveways, adequate parking in appropriate locations, landscaped open space, outdoor residential amenity area, adequate buffering and setbacks, and garbage storage areas. 	<p>The proposed development is compatible with the existing and planned context of the surrounding area:</p> <ol style="list-style-type: none"> a. The proposed development emphasizes the pedestrian realm, with active uses at-grade and large, publicly accessible outdoor amenity spaces. Parking will be located inside the podium and vehicular areas designed to the minimum required width. This layout will contribute to a quality pedestrian realm close to a future rapid transit corridor. b. The development will provide a strong, continuous building wall parallel to Oxford Street West. Entrances are oriented towards the sidewalk and connected via a landscaped plaza and path network. c. Buildings are located as close to the public street as possible without impacting Mud Creek. The 8-storey building heights at the northerly portion of the subject lands are appropriately setback from the 2- to 3-storey townhouses via the proposed window street and future landscaping. d. The proposed development will preserve natural areas along Mud Creek as a character defining feature. The proposed design provides opportunities for residents and visitors to enjoy this natural feature (i.e. pedestrian paths, bridge, landscaped plaza). e. Taller elements are located towards Oxford Street West/Mud Creek, with low-rise (podiums) at the rear of the subject lands which interfaces with a designated “Neighbourhood” Place Type. <p>The proposed massing is appropriate for a site in an established and future-planned apartment neighbourhood along a future rapid transit corridor.</p>

	<p>The proposed intensity of development can be accommodated on the subject lands while providing appropriate setbacks, vehicular / pedestrian access, and a high proportion of landscaped open space. Servicing and parking areas will be screened from adjacent lands, and all built areas will be adequately buffered from designated “Green Space” areas along Mud Creek.</p>
<p>Section 961A Mud Creek Area In the Neighbourhoods Place Type for the lands within the Mud Creek Area generally bounded by Oxford Street West to the south, Proudfoot Lane to the west, the CP rail line to the north and Cherryhill Boulevard to the east, no development shall occur within the lands regulated by the Conservation Authority prior to the completion of creek channel and stormwater works until such time as the creek channel and stormwater works have been completed in accordance with the recommendations of the accepted environmental assessment for the lands, and the as-built drawings have been accepted by the Conservation Authority having jurisdiction. For greater certainty, any Zoning By-law amendment approved prior to the works being completed shall contain a Holding Provision which requires the creek channel and stormwater works to be completed prior to any development occurring.</p>	<p>This is understood and acknowledged. It is anticipated that holding provisions will be applied to the lands requiring that the creek channel and stormwater works to be completed prior to any development occurring.</p>

Further to the above policy analysis and justification, the subject lands are subject to the Specific Area Policies of The London Plan, being within the Mud Creek Area. The proposed development is consistent with the planned function of The London Plan by permitting appropriate intensification along a high-order transit route, in a built-form that is complementary to the existing neighbourhood and future-planned development (1730_1).

The subject lands are unique in that they are one of the only large, undeveloped parcels of land within the City of London that do not abut any sensitive land uses that would be negatively impacted by a development of this scale. The proposed development will be adjacent to medium- to high-density residential, open space, and commercial uses, which are all generally compatible to a high-density, mixed-use development (1730_3). The proposed development will be a positive addition to the neighbourhood and broader community by providing an aesthetically pleasing building design with pedestrian-oriented uses to interface with the future multi-use public trail within the Mud Creek channel corridor (1730_5).

The subject lands are also unique in that they contain the Mud Creek channel corridor, which provides physical spatial separation between the proposed development and the Rapid Transit Corridor. Once the Mud Creek channel lands have been dedicated to the City of London, the subject lands will technically not have frontage along Oxford Street West, as the frontage will be considered to be along the Future Street to the north. A Specific Area Policy is contextually

appropriate in this instance, as there are no specific policies within The London Plan to adequately address this unique circumstance (1731).

The proposed Official Plan Amendment takes the scale and intensity of the proposed development into account, by permitting taller building heights closer to both the Oxford Street West right-of-way and future public open space, and limiting the building heights towards the lower-density built-form to the north (1733_).

Given the above, the proposed development represents an appropriate and compatible form of residential intensification at an appropriate location and is generally in conformity with the policies and intent of The London Plan. The proposed development is consistent with the planned function of the “Neighbourhoods” Place Type to permit appropriate intensification along a high-order transit route.

6.3 City of London Zoning By-law

The portion of the subject lands proposed for redevelopment are zoned “Commercial Recreation (CR)”, which provides for and regulates primarily indoor commercial recreational uses which are located outside of the floodway and flood fringe (Figure 7). The CR zone permitted the former Forest Glen Golf Centre.

The proposed Zoning By-law Amendment seeks to re-zone the portion of the subject lands zoned “Commercial Recreation (CR)” to a site-specific, special regulation “Residential (R10-3(_))” and “Community Shopping Area (CSA1)” compound zone, with site-specific special provisions. It is anticipated that holding provisions will be applied to the subject lands until such time that the Mud Creek infrastructure works are complete; and, the northerly lands are developed which will provide the proposed development with the primary vehicular access and municipal servicing.

The proposed R10-3 zone provides for and regulates the highest density residential developments in the form of apartment buildings, and the proposed CSA1 zone provides for and regulates a wide range of retail and personal service uses, as well as some office and commercial recreation. It is our opinion that these zones are appropriate to regulate the proposed development.

Table 1 provides a breakdown of the regulations for the existing “CSA1” zone, the existing “R10-3” zone, the requested, site-specific “R10-3(_)/CSA1(_)” compound zone, as well as a comparison to the built-form regulations exhibited in the Concept Plan. Site-specific development standards are to be confirmed and refined subject to a review of the application by Staff through the approvals process.

Table 1 – Zoning Statistics

	Current Regulations	Current Regulations	Proposed Regulations	Concept Plan
	CSA1	R10-3	R10-3(_)/CSA1(_)	
Lot Area (min.)	N/A	1,000m ²	1,000m ²	25,711m ²
Lot Frontage (min.)	30.0m	30.0m	30.0m	189.8m
Lot Depth (min.)	30.0m	N/A	N/A	134.3m
Front Yard Setback (min.)	8.0m	16.0m	11.0m*	11.8m
Interior Side Yard Setback (min.)	3.0m	31.2m	11.0m*	11.7m
Rear Yard Setback (min.)	3.0m	31.2m	5.0m*	5.0m
Building Height (max.)	9.0m	N/A	76.0m	76.0m
Lot Coverage (max.)	30%	40%	50.0%*	47.9%
Landscaped Open Space (min.)	10%	25%	25%	34.4%
Density (max.)	N/A	250uph	280uph*	277uph

***Denotes required special provision.**

It is noted that the site statistics as noted in the above table represent the conditions of the lands post-land dedication. As such, after the required road-widening lands and Mud Creek channel lands are dedicated to the City of London, the area of the subject lands is approximately 2.57ha. The requested special provisions relating to lot coverage and density are based on this ultimate area.

The regulations proposed for the proposed “R10-3() / CSA1()” compound zone are standard, except for the specific regulations relating to front yard setback, interior side yard setback, rear yard setback, lot coverage, and density.

Front Yard Setback

Subsequent to the dedication of the Mud Creek channel corridor to the City of London, the front yard of the subject lands will be considered to be the northerly property line, as the primary vehicular access will be via a Future Street within the Beaverbrook Subdivision. The purpose of a front yard setback is typically to provide for vehicular parking between a right-of-way and dwelling, or to maintain an established street wall, neither of which will apply to the proposed development

The proposed front yard setback of 11.0m is a minor reduction from the 16.0m standard and is appropriate for the subject lands, as they will be considerably setback from the Oxford Street West frontage given the physical separation created by the Mud Creek channel corridor. Further, the building has been sensitively designed so that the portion of the building with the least height, being the 8-storey tower, interfaces with the 2- to 3-storey townhouses to the north. The 11.0m front yard setback is appropriate as it provides reasonable spatial separation between the shared property line adjacent to the townhouse built-form. The proposed building will be separated from the shared property line by a window street and landscaping.

Interior Side Yard Setback

The subject lands abut commercial uses to the west, and future open space uses to the east. As such, a reduced interior side yard setback is appropriate as the proposed development will not result in any significant undue adverse impacts on abutting land uses. Neither of the abutting land uses to the east and west are sensitive uses that would be negatively impacted by the proposed building height and associated reduced interior yard setback. The reduced interior side yard setback facilitates a form of development that is efficient and compact.

Rear Yard Setback

The ultimate rear yard of the subject lands will be the southerly property line abutting the Mud Creek channel corridor. A 5.0m setback is proposed from the building face to the shared property line, which is considered to be appropriate as the intent of the proposed development is to provide a welcoming pedestrian realm along the future multi-use trail within the Mud Creek channel lands. It is envisioned that users of the multi-use trail, being pedestrian walking, running, cycling, or other, can easily access a variety of commercial uses which could include cafes, restaurants, retail stores, and more. The proposed 5.0m setback provides adequate spatial separation while still facilitating easy access to the subject lands.

Lot Coverage

The proposed lot coverage of 50% is appropriate considering the surrounding context of the proposed development, being adjacent to the Mud Creek channel corridor and associated outdoor recreational opportunities. The proposed development also provides significant opportunity for outdoor areas through grade-level and rooftop amenity areas.

Density

The subject lands are a unique location within the City of London, being one of the only large, undeveloped pieces of land that does not abut any sensitive land uses. Development of the subject lands will not negatively affect any of the surrounding land uses, and will be compatible and complementary to the existing commercial, and future high-density residential landscape. As such, making the most efficient use of the density of the subject lands is in the public interest and represents good land use planning.



Project No.: RND/LON/23-01

Date: JUNE 2024

Scale: NTS



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FIGURE 7 - ZONING BY-LAW
from interactive zoning map

**415 OXFORD ST OPA/ZBA
 RAND DEVELOPMENTS**
 415 OXFORD STREET WEST
 PT. LOT 14, CONCESSION C
 GEO. TOWNSHIP OF LONDON
 CITY OF LONDON
 COUNTY OF MIDDLESEX

7.0 ADDITIONAL CONSIDERATIONS

7.1 Public Consultation Strategy

The applicant scheduled a Virtual Open House on March 5th, 2024 to provide neighbours with the opportunity to learn about the proposed development and provide comments. Approximately 100 neighbours were invited, and only one neighbour responded to the invitation. This neighbour was individually contacted and provided with information.

8.0 CONCLUSIONS

The proposed Official Plan Amendment and Zoning By-law Amendment applications seek to permit a high-rise, mixed-use development consisting of 22-storeys and 704 residential apartment units on the subject lands. The existing policies of The London Plan relating to development along high-order transit routes generally support a development of this nature and scale.

The re-alignment of Mud Creek and associated reduction in flood hazard provides an opportunity to redevelop the subject lands for appropriate intensive uses. It is important to consider the development of these lands for their full potential given their location along a *Rapid Transit Boulevard*, as they represent a significant infill opportunity within the City that will be well-served by existing and planned infrastructure.

The policies of The London Plan are largely based on a network of higher-order public transit. Land uses planned along *Rapid Transit Boulevards* are specifically intended to take advantage of the relationship between transit and land use, permitting increased building height. Future residents on the subject lands will be able to take advantage of the location along a *Rapid Transit Boulevard*, and the proximate future rapid transit station at Beaverbrook Avenue, approximately 80m away.

It is acknowledged that there are flood hazards present on the subject lands, and such flood hazards will be reduced through the Mud Creek infrastructure works. No development is proposed within flood hazard areas, and it is anticipated that holding provisions will be implemented as part of any planning approval to limit development until the Mud Creek infrastructure works are complete.

Notably, there are no sensitive land uses in the area that would be meaningfully affected by the proposed development. The proposed subdivision to the north and east provides for a wide range of building typologies, including high-rise buildings that are in-keeping with the scale of this proposed development. The proposed development therefore represents a unique opportunity to meaningfully intensify an area that is located along a *Rapid Transit Boulevard* proximate to a wide range of commercial and high-rise residential uses. In this instance, the typical constraints and compatibility issues with infill development may not be present simply due to the existing conditions of the area and the ongoing Mud Creek infrastructure works.

As such, the proposed amendments to facilitate the redevelopment of the subject lands is appropriate given their proximity to a planned rapid transit station along a high-order street. Notably, this proposal can make efficient use of underutilized lands to help address the significant housing shortage in the City of London and throughout the Province.

Based on the above, and as detailed throughout this Planning Justification Report, the proposed development is consistent with the intent and policies of the Provincial Policy Statement and The London Plan. As such, the proposed Official Plan Amendment and Zoning By-law Amendment are considered appropriate for the subject lands and represent good land use planning.