



Planning & Design Report

**1447-1449 Dundas Street &
684-690 Hale Street
City of London, ON**

Holdco Holdings Inc.

July 2025



Zelinka Priamo Ltd.

LAND USE PLANNERS

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1.0 INTRODUCTION

Holdco Holdings Inc. have made an application to amend the City of London Official Plan and the City of London Z.- 1. Zoning By-law to permit the development of two, 18-storey, mixed-use buildings on the lands known municipally as 1447-1449 Dundas Street & 684-690 Hale Street (the “subject lands”). A pre-application consultation meeting took place with City of London Staff on May 30, 2023.

The purpose of this Planning and Design Report is to provide design details and evaluate the proposed Official Plan Amendment and Zoning By-law Amendment application within the context of existing land use policies and regulations, including the Provincial Planning Statement, the City of London Official Plan (The London Plan), and the City of London Zoning By-law.

In summary, this report concludes that the proposed Official Plan Amendment and Zoning By-law Amendment application to permit the proposed redevelopment is appropriate and desirable for the following reasons:

- The proposed Official Plan Amendment and Zoning By-law Amendment is consistent with the policies of the 2024 Provincial Planning Statement and The London Plan;
- The proposed Zoning By-law Amendment generally maintains the intent and purpose of the City of London Zoning By-law;
- The proposed Official Plan Amendment and Zoning By-law Amendment will permit a desirable use in an area well-suited to support additional commercial uses and residential density;
- The proposed redevelopment will make efficient use of underutilized lands within an established built-up area of the City;
- The proposed development is a compact, cost-effective form of development that and makes efficient use of infrastructure and municipal services within an existing settlement area to minimize land consumption and servicing costs;
- The proposed development provides a well-functioning site design and built-form that is compatible with, and complimentary to the surrounding land uses; and,
- The proposed development does not create any unacceptable adverse impacts on surrounding lands, as demonstrated in this Report and the accompanying reports submitted with these applications.

2.0 SUBJECT LANDS

The subject lands consist of four, rectangular-shaped parcels and one, irregularly shaped parcel of land located at the southeast corner of the Hale Street and Dundas Street (Figure 1-2). The combined total area of the parcels comprising the subject lands is approximately 0.43 ha (1.06 ac).

1447 Dundas Street is currently vacant, and is the former site of an automobile service station (Figure 3). 690 Hale Street contains a 2-storey converted dwelling that now operates as a denture care centre with an access driveway available off of Hale Street; and 684 Hale Street contains a vacant, 2-storey commercial building (Figure 4). 1449 Dundas Street contains a restaurant and associated parking area (Figure 5).

Vehicular access to the subject lands is currently provided on every lot except 1447 Dundas Street. A recent curb cut has been added to the west side of this parcel, allowing for informal vehicular access. Public sidewalks are available on both side of Dundas Street and on both sides of Hale Street, with access to public transit (Route #94 and #2B) along Dundas Street and along Hale Street (Route #2A). As previously mentioned, the subject lands abut Dundas Street to the north. The intersection of Dundas and Hale Street facilitates both vehicular and rail traffic as the CN rail line extends through the intersection.

The subject lands are identified as within the “*Urban Corridor*” and “*Neighbourhood*” Place Types along a “*Civic Boulevard*” Street Classification in The London Plan. Mixed-use buildings are a permitted use. A standard maximum height of 8-storeys and an upper maximum of 15-storeys is contemplated. 18-storey buildings are not contemplated, and as such, an Official Plan Amendment is required. Additionally, an interpretation in accordance with Policy 43_1 of The London Plan is required to re-interpret the site to be wholly within the “*Urban Corridor*” Place Type.

The subject lands are currently zoned “*Associated Shopping Area Commercial 4 and 5 (ASA4/ASA5)*” in the City of London Z.1 Zoning By- Law. The “*Associated Shopping Area Commercial*” Zone permits a range of commercial and institutional establishments. Residential uses are not permitted within this zone, and as such, two, 18-storey, mixed-use buildings are not permitted, therefore, a Zoning By-Law Amendment is required.

Figure 1 – Aerial view of the subject lands with surrounding context



Figure 2 – Aerial view of the subject lands



Figure 3 – Google Street View of the subject lands (looking east from Hale Street)



Figure 4 – Google Street View of the subject lands (looking northeast from Hale Street)



Figure 5 – Google Street View of the subject lands (looking south from Dundas Street)



3.0 SURROUNDING LAND USE CONTEXT

3.1 Spatial Analysis

Figure 6 shows the subject lands, notable features, and land uses within a 400m and 800m radius. The two radii represent walking distances of approximately 5 and 10 minutes, respectively. Arterial roads are identified with yellow arrows and railways are identified with blue dashed arrows. The subject lands are located along a civic boulevard (Dundas Street). Dundas Street has two lanes of traffic in each direction. Public sidewalks are located along both sides of Dundas Street, providing connections to First Street to the east and Highbury Avenue North to the west.

Figure 6 – Spatial analysis of the subject lands within a 400m & 800m radii



Note: Location and boundaries are approximate

Areas within 400m (5 minutes walking), southeast of the subject lands are currently dominated by low density residential uses in the form of single-detached dwellings and open space/park uses.

The existing land uses within an approximate 400m, 5-minute walk radius and an approximate 800m, 10-minute walking distance of the subject lands are as follows:

North: Commercial and industrial uses are the primary land uses within 400m north of the subject lands (Figure 7). Commercial uses directly across Dundas Street include various retail stores, with industrial uses being the Canadian National Rail Line. A range of commercial and residential uses are currently being planned for and developed to the north, including a new Human Society location (Figure 8), a long-term care facility, and the London Psychiatric Hospital (LPH) lands undergoing a Draft Plan of Subdivision to establish mixed uses (Figure 9). The LPH lands comprise the majority of the lands within 800m of the subject lands. Notably, a 10-storey mixed-use building was recently approved at 1472 Dundas Street.

Figure 7 – Commercial uses north of the subject lands on Dundas Street



Figure 8 – Conceptual rendering of the Human Society building currently under construction to the north of the subject lands



Figure 9 – London Psychiatric Hospital Lands planned for mixed-use development



South: Residential uses in the form of low and medium-rise apartment buildings (Figure 10-11), single detached dwellings and open spaces uses (Kiwanis Park) are located within 400m of the subject lands (Figure 12). A continuation of residential uses in the form of single detached dwellings and open space uses are the primary land use within 800m of the subject lands.

Figure 10 – Low-rise apartment building on Hale Street (652 Hale Street)



Figure 11 – Senior citizen housing on Hale Street (632 Hale Street)



Figure 12 – Kiwanis Park



West: Industrial, community facilities, auto-oriented commercial and low-density residential uses in the form of single detached dwellings are the primary land uses within 400m of the subject lands (Figure 13-15). A major transportation corridor (Highbury Avenue North) is located within 800m of the subject lands, providing a connection to the Downtown Area and north London.

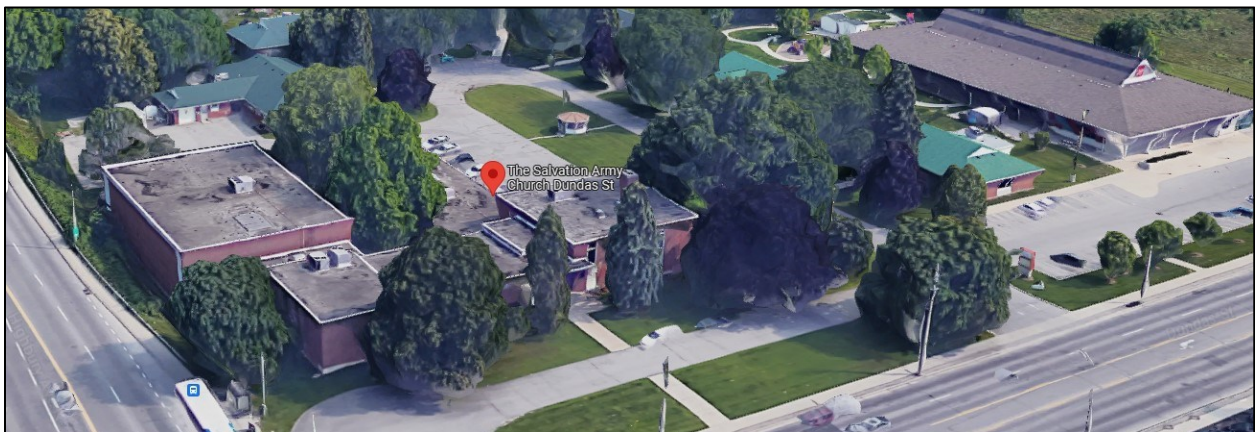
Figure 13 – Industrial uses to the west of the subject lands



Figure 14 – Looking west on Dundas Street



Figure 15 – Community Facility – Salvation Army lands along Dundas Street



East: A range of commercial, community, low-density residential and open spaces uses are present within 400m east of the subject lands. Commercial uses exist in the form of retail stores, gas stations, emergency response/fire stations, eat-in restaurants, salons, and auto maintenance/repair shops (Figure 16-17). Residential uses in the form of single detached dwellings are the primary residential form within 400m, east of the subject lands and beyond (Figure 18). Additionally, some industrial uses are present within 800m of the subject lands.

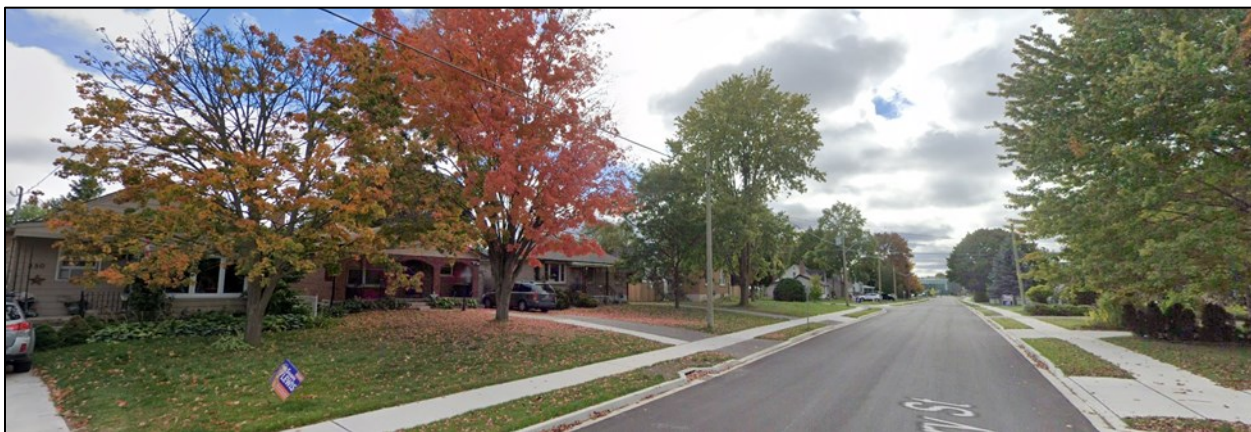
Figure 16 – Church abutting the subject lands to the east (looking southwest)



Figure 17 – Looking east on Dundas Street



Figure 18 – Low-density residential areas within 800m east of the subject lands



In summary, lands within 400m (5-minute walk radius) are predominantly comprised of commercial, neighbourhood/community facilities and residential uses in the form of low-rise apartment buildings, multi-unit dwellings, and single detached dwellings. Lands within 800m (10-minute walk radius) are similar to those described above but also include open space uses, high-density residential, and some industrial uses. Access to the bike paths within Kiwanis Park is located 270 m south of the subject lands, providing an active transportation link to residential, commercial, recreational, and institutional uses throughout London.

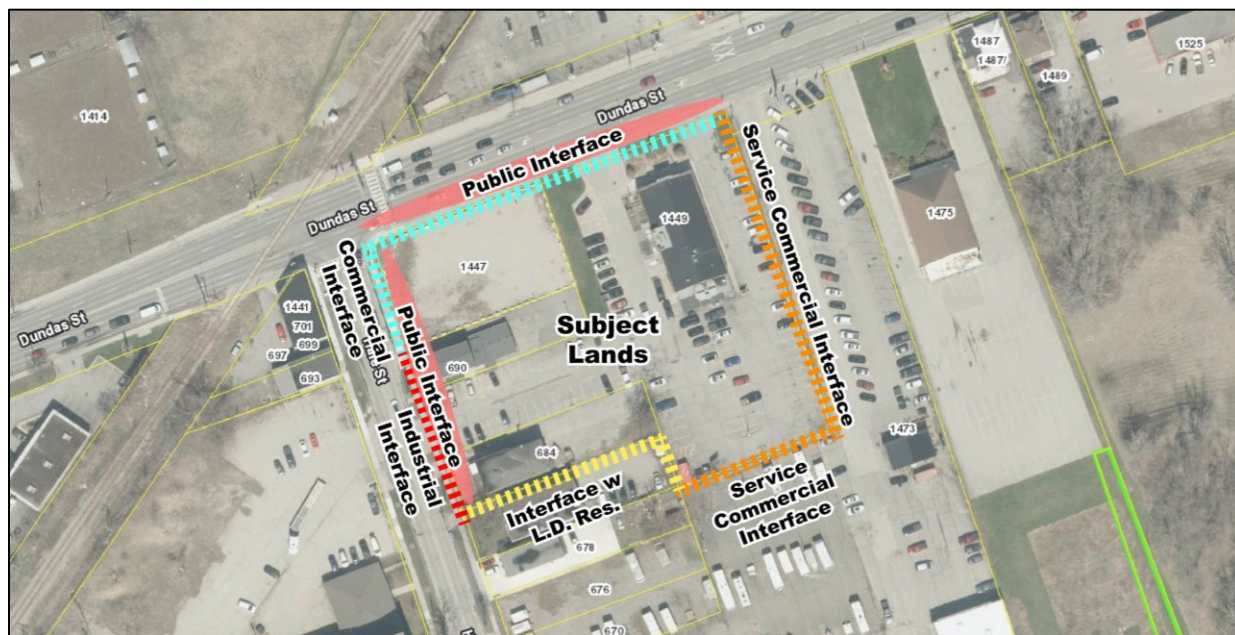
Overall, the subject lands have good access to a wide range of open space areas, recreational opportunities, employment opportunities, schools, and shopping areas within walking distance.

3.2 Site-Specific Spatial Analysis

Figure 19 below illustrates the relationship between the subject lands and abutting uses. The active frontage of the subject lands is located along Dundas Street (Arterial frontage), and Hale Street, shown in pink. These locations will have an active relationship with the abutting roads, and will provide a positive pedestrian environment. The Hale Street frontage will accommodate a point of vehicular access and pedestrian connections to the proposed building.

Generally, lands to the east and west are not sensitive to significant development. However, lands to the south, being low-density residential uses, may be sensitive to significant forms of development. Care will be required in these areas to ensure compatibility with abutting lands in these locations.

Figure 19 – Site Specific Spatial Analysis



Note: Location and boundaries are approximate

4.0 DESIGN GOALS AND OBJECTIVES

A key design goal of the proposed development is to provide a mixed-use apartment building that will enhance the existing streetscape along Dundas Street and Hale Street. The design is intended to be compatible with, and sensitive to, the surrounding mix of existing and emerging land uses. In order to effectively achieve this goal, the following design objectives have been identified:

- Provide for a high-rise, mixed-use residential development, along corridors that may vary in use, character, and intensity;
- Make efficient use of the subject lands for uses compatible with, and complementary to, existing development in the surrounding area;
- Provide additional height and massing for buildings located close to the street;
- Provide a density that makes efficient use of the land and the available municipal services, infrastructure, transit, and transportation infrastructure;
- Provide a development that utilizes high-quality materials in a built form compatible with adjacent land uses;
- Appropriately integrate the built form into the existing land use policy context, specifically in terms of massing, height, and articulation;
- Provide opportunities for complete communities by providing a range of housing types that support aging in place;
- Revitalize the existing context with a modern, well-designed building constructed of quality materials that creates a unique and desirable sense of place within the community; and,
- Place an emphasis on the corner location of the subject lands, by functionally and visually providing active ground floor use to support a pedestrian friendly environment.

5.0 PROPOSED DEVELOPMENT

The subject lands are proposed to be redeveloped to accommodate two, 18-storey, mixed-use buildings with each containing 170 dwelling units and 104 m² of commercial space on the ground floor (Figure 20).

Figure 20 – Conceptual rendering of the proposed buildings

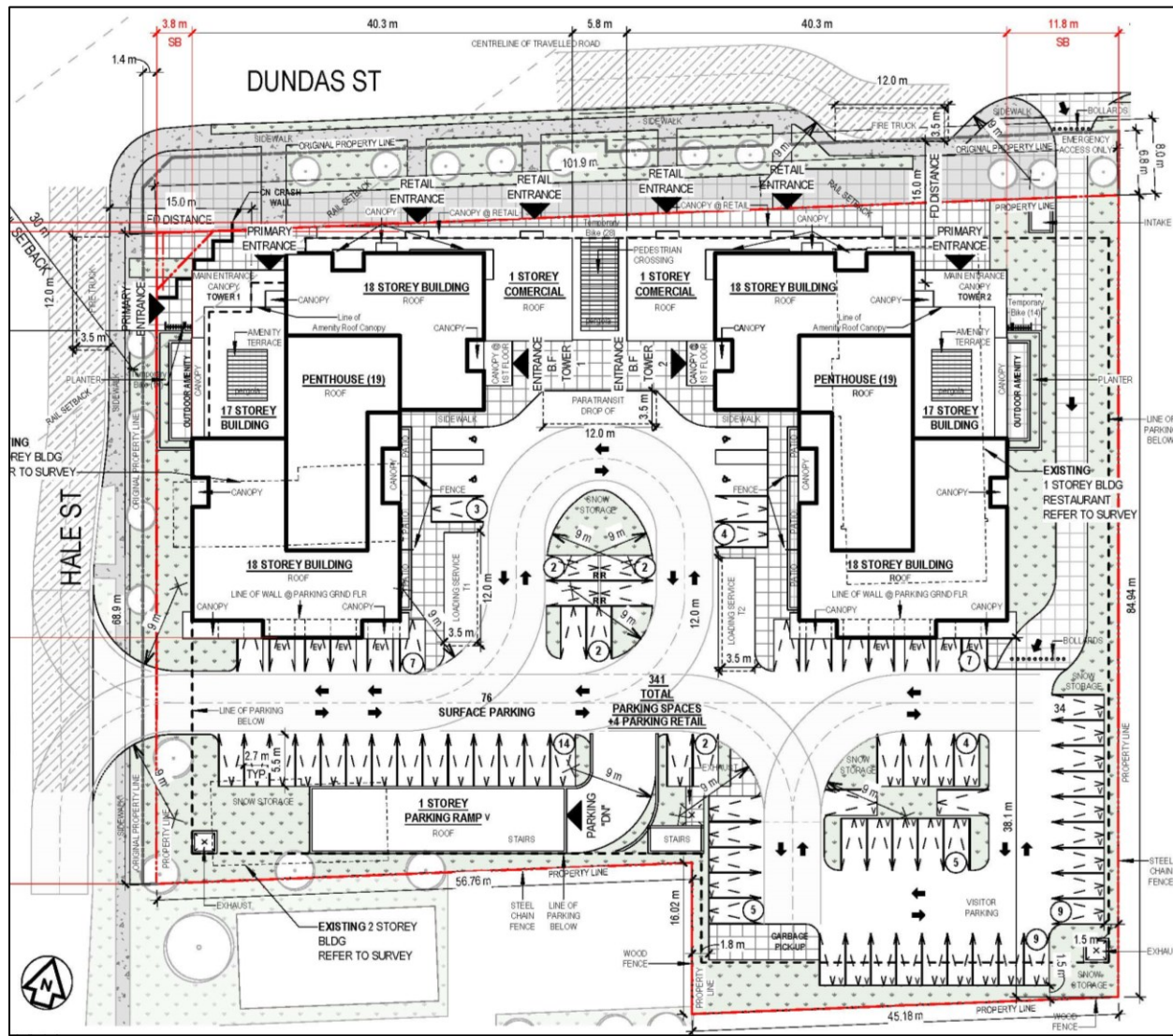


5.1 Site Design

The L-shaped buildings create a strong street presence with a minimal 3.8 m front yard setback from Hale Street and an exterior side yard setback of 1.0 m from Dundas Street (Figure 21). The proposed buildings also have a rear yard setback of approximately 11.8 m to the east, and an interior side yard setback of 26.1 m to the south. The provided setbacks are intended to mitigate

impacts and to ensure compatibility with abutting lands to the south and east. The proposed development provides a density of 395 units per hectare (UPH) (based on the combined total lot area of approximately 8,603 m²). Pedestrian access is proposed at locations facing outward towards the streets and internal to the site facing the parking area. It is intended that the proposed 104 m² of commercial floor space within each building will be occupied by community-scale uses such as restaurants, personal service establishments, and/or professional offices.

Figure 21 – Conceptual Site Plan (excerpt)



Vehicular access is provided by a full-turns driveway from Hale Street. The proposed entrance connects to a ramp leading to the underground residential parking area. A total of 341 parking spaces are proposed, both at-grade (surface) and within an underground parking structure. A maneuvering area for service/refuse collection trucks is provided for the mixed-use building in an internal surface parking area. The surface parking area is screened from the abutting roads by the 18-storey mixed-use buildings and landscape areas (Figure 22).

Outdoor amenity areas in the form of a patio at-grade and outdoor terraces accessible from the first and second floors will be available on site for the common use of residents. Bicycle parking and garbage/recycling collection will also be provided in the underground parking area. Lay-by/loading areas are provided interior to the site along the east and west side of the buildings, providing convenient access for para-transit vehicles.

Figure 22 – Conceptual front view of the proposed 18-storey buildings (looking south from Dundas Street)



Additional renderings and description of the development is provided in Section 6 of this report.

6.0 DESIGN AND SITE COMPATIBILITY

6.1 Built Form

The proposed development provides a valuable opportunity to meaningfully contribute to the Dundas Street/Hale Street streetscape and the Argyle Community overall by enhancing the quality, functionality and visual appeal of the subject lands and the adjacent public realm.

The subject lands are significantly underutilized in their current form. Intensification on the subject lands provides an opportunity to improve and enhance the existing public realm condition, including the lack of a strong built-form relationship to the street edges, and a better integration of the lands into the surrounding urban fabric.

The proposed development offers a 1.0 m setback along Dundas Street, with direct access to at-grade commercial store fronts, providing a strong and vibrant street presence (see Figure 23). Further, the principal residential entrances are oriented towards Hale Street, thereby providing logical and visible points of access. The surface parking area and landscaped amenity space are located internal to the site and generally screened from public view.

Figure 23 – Conceptual views of the proposed 18-storey buildings from Dundas Street



From a built-form perspective, the subject lands are contextually appropriate in terms of size and location for mixed-use buildings, given the property's location in an emerging transit-rich area.

The proposed 18-storey building height is generally compatible with existing and planned development/building heights in the surrounding area, and is a planned and expected built-form in the "Urban Corridor" Place Type. Notably, significant development is planned in the surrounding context of the subject lands, including the London Psychiatric Hospital Lands, with permitted buildings heights of up to 31 storeys.

The building is stepped back after the first storey along Dundas Street, supporting a human-scale environment. Thus, the proposed built-form is compatible and a good fit within its context.

The proposed buildings, fronting along the Dundas Street/Hale Street road allowances, will enhance the character and quality of the streetscape/public realm through the provision of landscaped areas, pedestrian walkways, and an increased building height and visibility for passive surveillance of the surrounding area.

6.2 Massing and Articulation

From a massing perspective, the development has been sensitively designed as to fit within its surroundings and to be compatible with the varying scales of built-form in the surrounding area. In this regard, the proposal provides an appropriately scaled base with a partial step back after the second floor commercial space facing Dundas Street to ensure a compatible relationship between the new built-form, the public realm, and nearby commercial, residential, and institutional land uses.

The ultimate width of Hale Street at this location is 20.0m, with Dundas Street at 27.0m. With the proposed building height at approximately 60.2 m. The London Plan contemplates buildings up to 15-storeys in height along the “*Civic Boulevard*” Street Classification within the “*Urban Corridor*” Place Type, and typically, building heights are encouraged to be similar to the width of the right-of-way which it is adjacent to. However, given the absence of sensitive land uses abutting the subject lands, the proposed development is being proposed at 18-storeys to maximize the use and efficiency of the lands and respond to the core housing needs in London.

The 60.2 m height of the buildings provides a much more appropriate massing along this portion of the Dundas and Hale Street corridor, providing a visually appealing street wall and an inviting pedestrian environment. The use of contrasting colour/material help to break up the massing, providing variation and visual interest on all facades.

6.3 Character and Image

Much of the Argyle area is comprised of single detached dwellings converted to commercial/office uses and residential uses in the form of mid-to-low-rise apartment buildings, multi-unit dwellings, and single detached dwellings. The proposed development provides a mix of commercial and residential uses, with minimal setbacks from the street, and a building façade that welcomes passersby at a human-scale. As such, the proposed development would be a complementary addition to this portion of the Dundas/Hale Street corridor, which currently, lacks a strong sense of place for pedestrians.

The proposed building provides a strong and appropriate, yet distinct, visual presence with a mix of contemporary/modern building materials and finishes. The proposed development is a complementary use to the range of commercial uses that have frontage along Dundas Street,

allowing the new residential use to fit well within the surrounding context. The proposed building contributes to the emerging character and image of the corridor by providing a modern and contemporary building that will add to the unique character of the area. The intent of the proposed development is to provide a high-quality, distinctive, and memorable image with a desirable use that fulfills and maximizes the planned function of the lands.

6.4 Architectural Treatment

The proposed building is a contemporary architectural style with modern building materials, roof lines, and fenestration. Conceptual elevations are shown in Figures 24 through Figure 27 in the following pages. The front façade of the building facing Dundas Street incorporates architectural panelling in white, grey and blue. Blue architectural panelling is used on the easternmost and westernmost sections of the building on the façade facing Dundas Street, with grey and white architectural panelling used on the inner facades. The first and second floor of the buildings, containing the commercial uses and primary residential entrances, are differentiated from the rest of the building with the use of grey spandrel back painted glass, dark grey brick, black aluminum composite material (ACM) accents, and commercial/residential signage. The first floors of the buildings extend to create a podium-like base with a covered pedestrian pathway from Dundas Street, providing additional commercial space and further emphasizing the ground floors, the human-scaled aspects of the building and providing additional visual interest. Black ACM accents are also used to highlight the 18th floor of both buildings. Additionally, each unit features prefinished glass windows and doors with glass railings enclosing a private balcony or terrace. The predominant use of glass provides the units with ample natural lighting while also helping to reduce the visual bulk of the building. Metal pergolas are used to enclose rooftop utility equipment.

These architectural and site features provide an attractive development that is distinct, yet compatible with the surrounding neighbourhood and planned improvements and development for the area. The proposed high-density, mixed-use development will provide an aesthetic focal point at this prominent location in the Argyle neighbourhood.

Figure 24 – Proposed North Elevation (Front Yard, Dundas Street frontage)

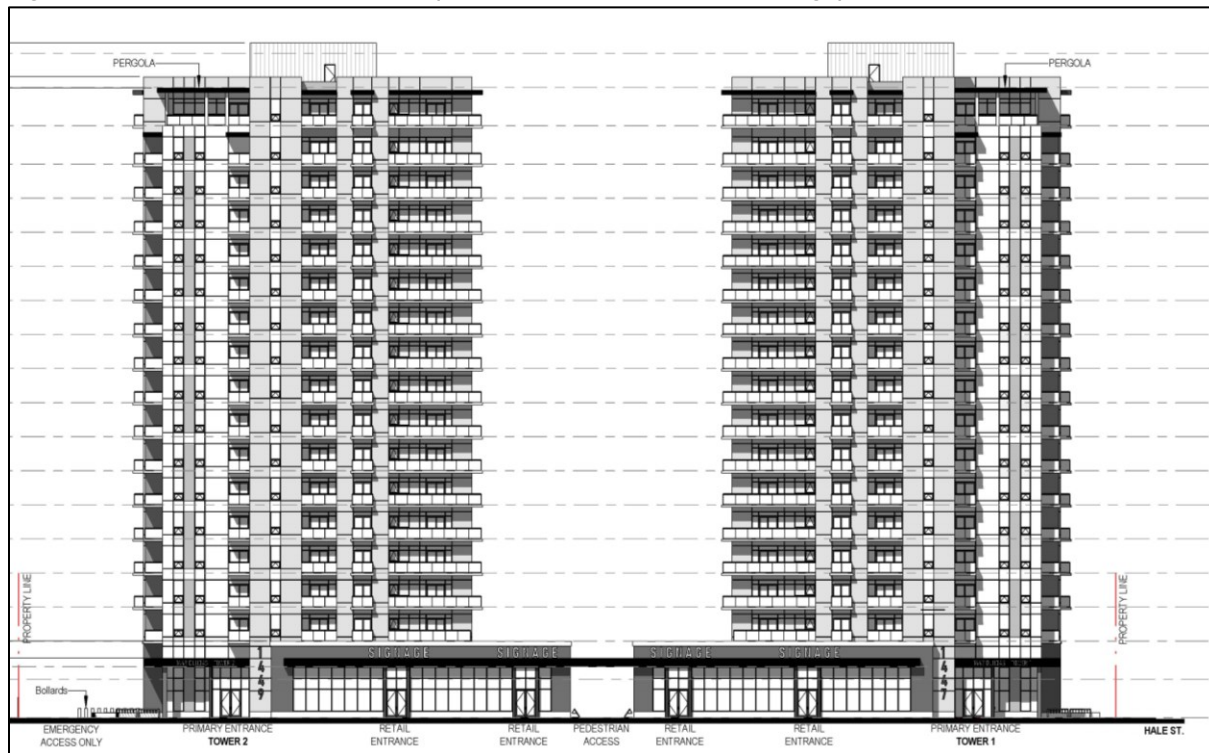


Figure 25 – Proposed West Side Elevation (Interior side yard, facing a commercial lot)



Figure 26 – Proposed Rear Elevation (Interior side yard, facing the internal parking area and low-density residential lots)

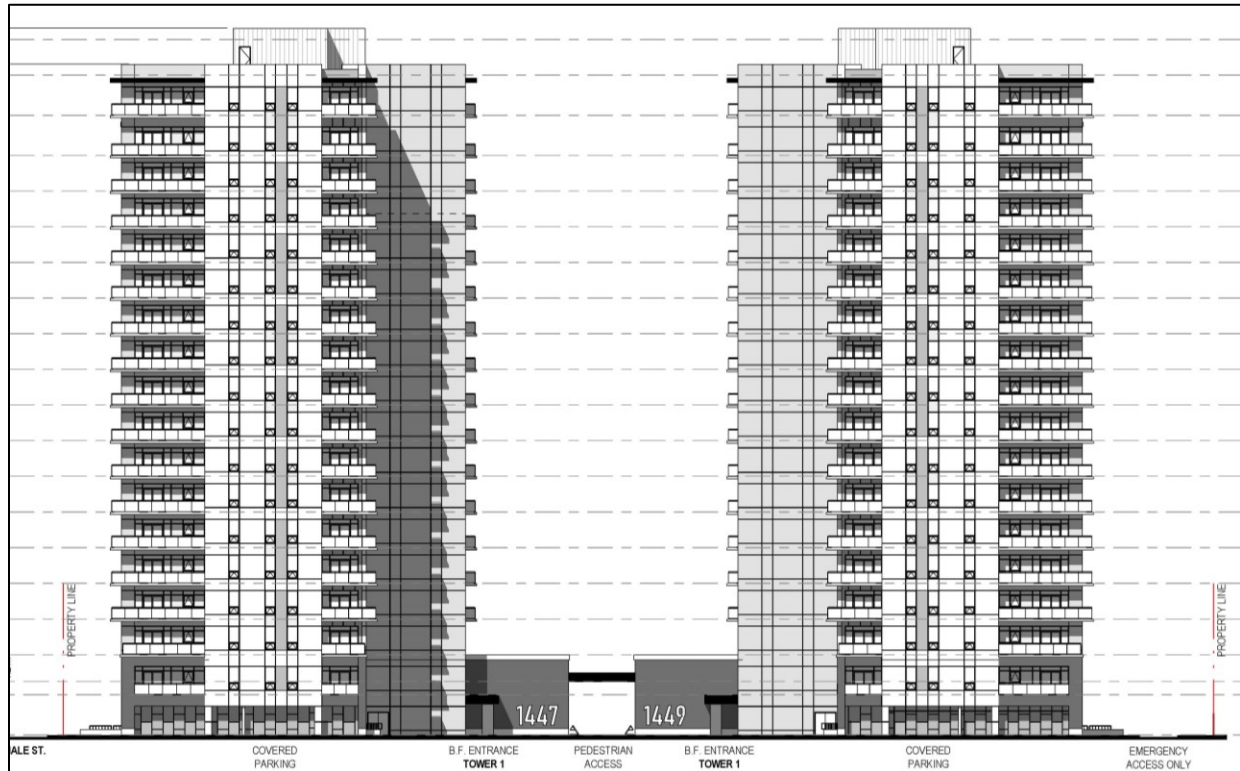
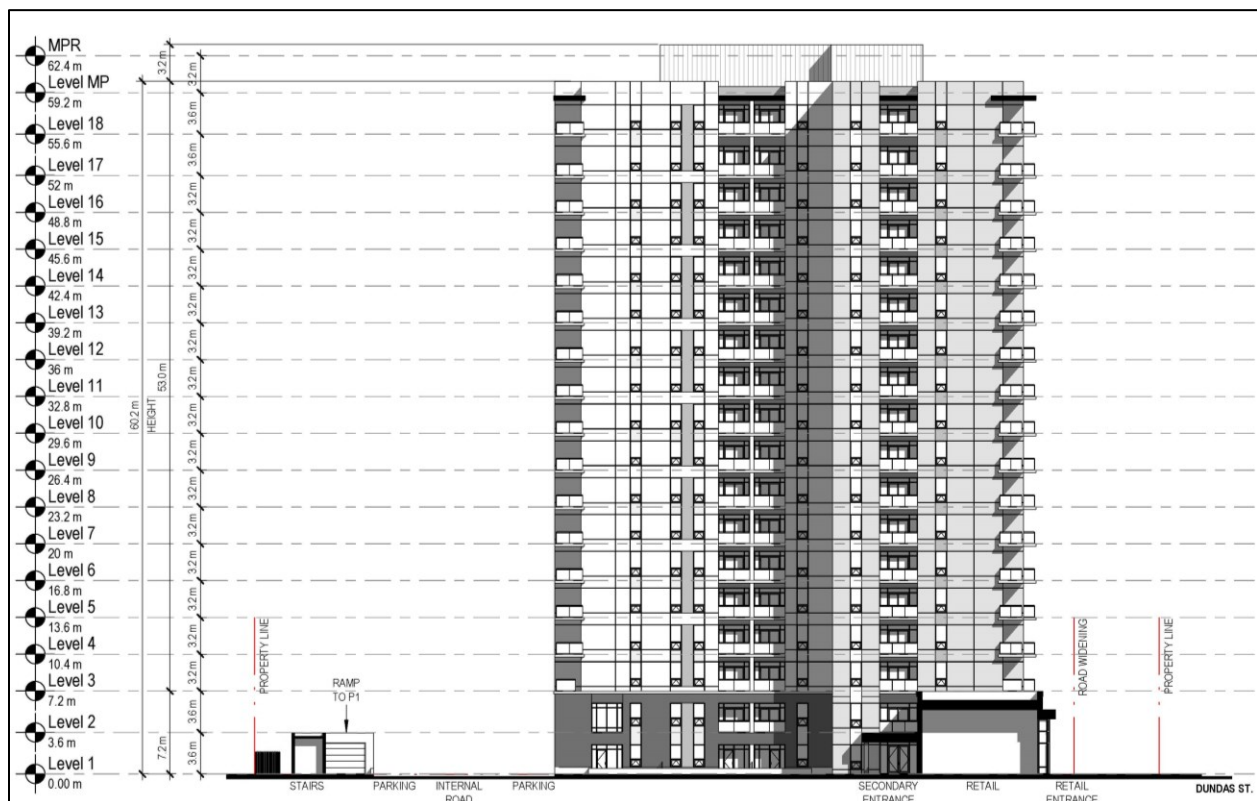


Figure 27 – Proposed East Side Elevation (Interior side yard, facing a commercial lot)



6.5 Public Realm

The public realm along Dundas Street is generally characterized by a mix of vacant and active service commercial buildings fronting a sidewalk, which itself abuts the street. The public realm along Hale Street is generally characterized by residential uses in the form of mid-low-rise apartment buildings and single detached dwellings with some institutional and industrial uses present. Hale Street can also be characterized by the presence of street trees, overhead power lines, pedestrian crossings and sidewalks setback from the road. The proposed development seeks to enhance the Dundas and Hale Street corridors by bringing vibrant and active commercial uses to the street and reconstructing the space between the building and the travelled portion of the road with new hardscaping and contextually appropriate landscaping. Active commercial uses, combined with the residential uses above, will create an ‘eyes-on-the-street’ interface, enhancing the pedestrian experience in front of the building. Site specific elements, such as planter locations, street furniture, and hardscape treatment will be refined through the Site Plan Approval process.

The public realm will be defined by the location of the 15-storey building close to the street line, providing a focal point for the area at a prominent intersection along a “*Civic Boulevard*”.

Overall, the proposed development’s direct interaction with Dundas Street and Hale Street will significantly enhance the public realm by activating the streetscape with commercial uses, enhance connections, and increase safety by instilling a more defined, comfortable pedestrian experience.

7.0 PROPOSED PLANNING APPLICATIONS

Official Plan Amendment

The proposed Official Plan Amendment seeks to add a specific policy to the subject lands to permit a height up to 18-storeys; and, proposes a slight expansion of the “*Urban Corridor*” Place Type to the south to fully encompass the lots comprising the subject lands.

Zoning By-law Amendment

The proposed Zoning By-Law Amendment seeks to rezone the subject lands to a site specific, “*Business District Commercial (BDC (_))*” zone to permit the 18-storey, mixed-use buildings with 170 residential units and 104 m² of commercial space on the ground floor within each building. The proposed special provisions are as follows:

- Maximum front yard depth of 3.8 m;
- Maximum height of 60.2m (18-storeys);
- Minimum rear yard depth of 11.8 m;
- Minimum of 4 commercial parking spaces; and,
- Maximum density of 395 UPH.

8.0 POLICY ANALYSIS

The following sections of this report provide analysis regarding the proposed development and associated planning applications with respect to applicable policy and regulatory documents.

8.1 Provincial Planning Statement, 2024

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 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 below table.

Provincial Planning Statement (2024) Policy Analysis Table	
Policy	Response
<u>Section 2.1 Planning for People and Homes</u> To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall: - maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and - maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans. Planning authorities should support the achievement of complete communities by: - accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;	The proposed development is an efficient and appropriate form of residential development 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. The proposed development is a compact and cost-effective form of housing that will utilize existing municipal services within a built-up area of the City. Thus, the consumption of land and servicing costs are minimized. The subject lands are a suitable location for the proposed development, being located within a designated “<i>Urban Corridor</i>” Place Type along an Arterial Road with walkable access to goods, services, and transit around the City of London.
<u>Section 2.2 Housing</u> Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by: establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income	The proposed development will contribute 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 residential development and intensification. This proposed development is considered appropriate as it makes efficient use of existing infrastructure and

households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs; • permitting and facilitating: ◦ all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and ◦ all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3; • promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and • requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.	public services; makes good use of underutilized land; supports the use of existing active transportation and public transit routes; contributes to housing supply; and, is a compact and cost-effective built-form. The development's units are proposed to be appropriately sized in accordance with the needs of future occupants, which will contribute to the range of options for housing affordability in this part of the City.
<u>Section 2.3 Settlement Areas and Settlement Area Boundary Expansions</u> 2.3.1 General Policies for Settlement Areas • Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas. • Land use patterns within settlement areas should be based on densities and a mix of land uses which: ◦ efficiently use land and resources; ◦ optimize existing and planned infrastructure and public service facilities; ◦ support active transportation; ◦ are transit-supportive, as appropriate; and ◦ are freight-supportive. • Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities. • Planning authorities shall establish and implement minimum targets for intensification	The subject lands are located within a settlement area, being within the City of London's Urban Growth Boundary. The proposed development will broaden the range of residential forms and intensities in the immediate area, and complement the range and intensities of mixed forms in the greater surrounding area. The proposed development makes efficient use of underutilized land, resources, infrastructure, and existing transportation networks by adding residential uses to the subject lands. The subject lands are serviced by pedestrian sidewalks via the Hale Street and Dundas Street right-of-way, supporting the use of active transportation; and, are located near existing transit routes, supporting the use of existing transit infrastructure. The subject lands are an appropriate location for residential uses in the proposed form as the lands are located within the Urban Growth Boundary of the City with good access to existing public transit services. The subject lands are within walking distance to public services, amenities, and green spaces. The proposed density will help to achieve a more intense form of compact development and is supported by the applicable technical studies provided. The proposed density of 395 UPH is reflective of a compact and

and redevelopment within built-up areas, based on local conditions.	efficient form of housing which adds to the mix of uses and densities in this area planned for significant growth.
<u>3.6 Sewage, Water and Stormwater</u> 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. For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.	The proposed development will make full use of available municipal services.
<u>Section 5.1 General Policies for Natural and Human-Made Hazards</u> Development shall be directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage, and not create new or aggravate existing hazards	There are no significant risks to public health and safety from the proposed development.

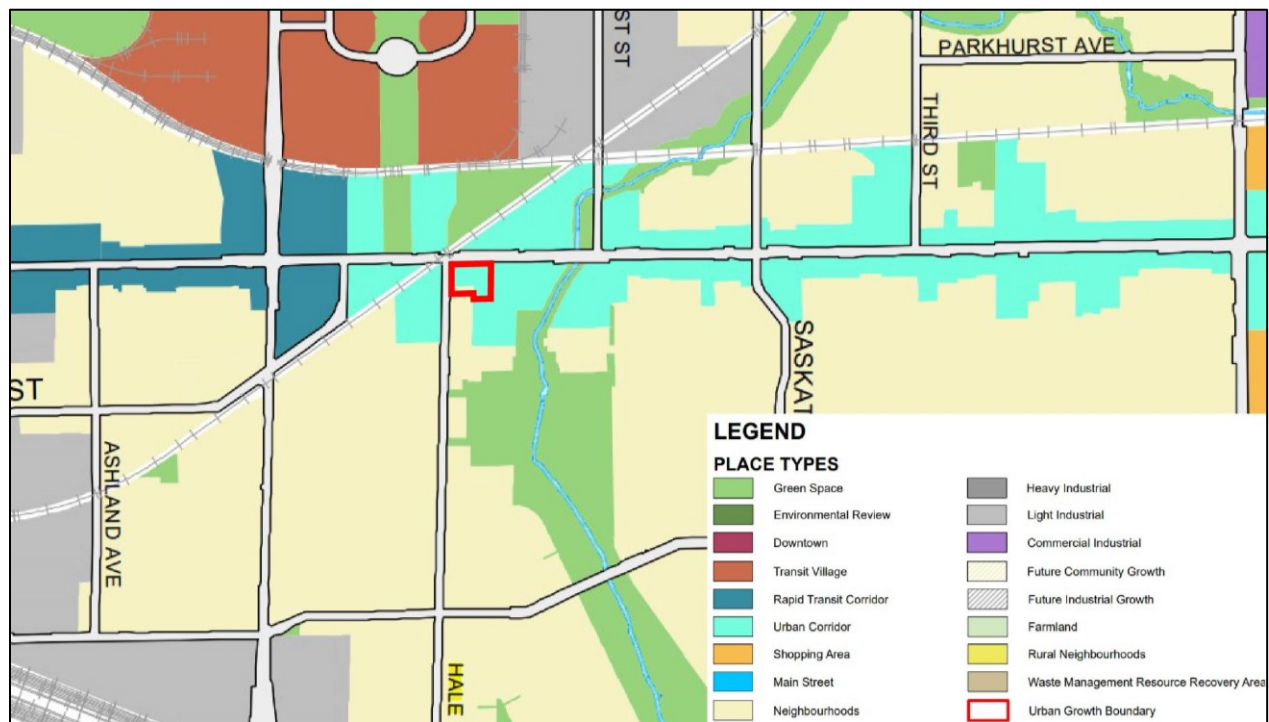
Given the above, the proposed development and associated amendments are consistent with the 2024 Provincial Planning Statement.

8.2 The City of London 2016 Official Plan

The 2016 Official Plan (The London Plan) is the land use planning policy framework that applies to all lands within the City of London. It emphasizes growing inward and upward to reduce the costs of growth, create walkable communities, revitalize urban neighbourhoods and business areas, protect farmlands, and reduce 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.

The subject lands are within the “*Urban Corridor*” and “*Neighbourhoods*” Place Type on “*Map ‘1’ – Place Types*” (Figure 28); located at the intersection of a “*Civic Boulevard*” (Dundas Street) and “*Neighbourhood Connector*” (Hale Street) on “*Map ‘3’ – Street Classifications*” (Figure 29); and, within the “*Argyle Area Community Improvement Plan (CIP)*” on “*Map ‘8’ – Community Improvement Project Areas*” of The London Plan.

Figure 28 – The subject lands identified on The London Plan’s “Map 1 – Place Types”



Note: Location and boundaries are approximate

Figure 29 – The subject lands identified on The London Plan’s “Map 3 – Street Classifications”



Note: Location and boundaries are approximate

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

The London Plan Policy Analysis Table	
Policy	Response
<u>Policy 43 1 Interpretation of the London Plan</u> It is intended that the policies of this Plan will allow for a reasonable amount of flexibility through interpretation, provided that such interpretation represents good planning and is consistent with the policies of this Plan and the Provincial Policy Statement. In instances where interpretation is needed, the following policies will apply: 1. The boundaries between place types as shown on Map 1 – Place Types, of this Plan, are not intended to be rigid, except where they coincide with physical features (such as streets, railways, rivers or streams). The exact determination of boundaries that do not coincide with physical features will be interpreted by City Council. Council may permit minor departures from such boundaries, through interpretation, if it is of the opinion that the intent of the Plan is maintained and that the departure is advisable and reasonable. Where boundaries between place types do coincide with physical features, any departure from the boundary will require an amendment to the Plan	While the majority of the subject lands is located within the “<i>Urban Corridor</i>” Place Type, one lot (684 Hale Street), is located within the “<i>Neighbourhoods</i>” Place Type. Therefore, as part of this application, a minor adjustment to the “<i>Urban Corridor</i>” Place Type is proposed to encompass the entirety of the subject lands. As the “<i>Urban Corridor</i>” boundary in this instance does not coincide with physical features, it is our opinion that the intent of the London Plan will be maintained and that the proposed adjustment is minor, appropriate and reasonable.
<u>Policy 826-828 - Our Vision for the Rapid Transit and Urban Corridor Place Type</u> 826_Our rapid transit corridors will be vibrant, mixed-use, mid-rise communities that border the length of our rapid transit services. Not all the segments of our corridors will be the same in character, use and intensity. Some segments will be primarily residential in nature, allowing only for small-scale commercial uses. In other segments, where large amounts of commercial floor space already exist, opportunities will be made for new stand-alone commercial uses while opening new opportunities for mixed-use development. 827_ Located in the Primary Transit Area and also along rapid transit routes, the Rapid Transit Corridors will be some of the most highly-connected neighbourhoods in our city. They will be linked to the Downtown and to the Transit Villages. Most of these corridors will be fundamentally walkable streetscapes, with abundant trees, widened sidewalks, and development that is pedestrian- and transit-oriented. Those parts of the Rapid Transit Corridors that are in close proximity to transit stations may allow for a greater intensity and height of development to support transit usage and provide convenient transportation for larger numbers of residents.	The proposed development is in alignment with The London Plans vision for the “<i>Urban Corridor</i>” Place Type given the mixed-use nature of the proposed buildings in an area with good access to existing and emerging public transit systems. The proposed development will enhance the aesthetics of the public realm along this section of the Dundas/Hale Street corridor with well-designed buildings providing commercial uses at-grade and landscaped elements along the street frontages. From a built-form perspective, the subject lands are contextually appropriate in terms of size and location for a mixed-use building of the proposed intensity (395 UPH), especially given the property’s location in an emerging transit-supportive area. The proposed 18-storey buildings height is generally compatible with nearby building heights in the surrounding area, and is the planned and expected built-form in the “<i>Urban Corridor</i>” Place Type. Thus, the proposed built-form is compatible and a good fit within its context.

828_ Our Urban Corridors will support a form of development that is very similar to our Rapid Transit Corridors, but at a slightly lower intensity. They will be places that encourage intensification over the life of this Plan so that they can mature to support higher-order transit at some point in the future beyond 2035. These corridors will support residential and mixed-use development. Like the Rapid Transit Corridors, different segments of these Urban Corridors may vary in use, character and intensity.	
<u>Policy 829 - Role within the City Structure</u> 829_ Rapid Transit Corridors are the connectors between our Downtown and our Transit Villages. They offer great opportunities for people to live and work close to high-order transit to give them attractive mobility choices. These corridors will vary from segment to segment, depending upon their context, the degree to which they are transitioning from one form to another and City Council's goals for their future development. The Urban Corridors are mixed-use areas that may develop into good candidates for future rapid transit corridors beyond the life of this Plan.	The subject lands are within the “<i>Urban Corridor</i>” Place Type and located on a “<i>Civic Boulevard</i>” Street Classification, and as such, are a primary location for mixed-use development. The proposed Official Plan Amendment/Zoning By-Law Amendment application intends to retain commercial uses on the subject lands while providing residential uses at a greater intensity in an area well-suited to support the proposed development. A slight expansion of the “<i>Urban Corridor</i>” Place Type is proposed to fully encompass all lots comprising the subject lands.
<u>Policy 830 - How Will We Realize Our Vision?</u> 830_ Where the term “corridor” is used, without the “rapid transit” or “urban” modifier, it is meant to apply to both of these types of corridors. We will realize our vision for our corridors by implementing the following in all the planning we do and the public works we undertake: 1. Plan for various segments of our corridors differently, with “segment-specific” policies to guide their development. 2. Plan for a mix of residential and a range of other uses along corridors to establish demand for rapid transit services. 3. Allow for a wide range of permitted uses and greater intensities of development along Corridors close to rapid transit stations. 4. Carefully manage the interface between our corridors and the adjacent lands within less intense neighbourhoods. 5. Require transit-oriented and pedestrian oriented development forms along these corridors. 6. Support the development of a variety of residential types, with varying locations, size, affordability, tenure, design, and accessibility so that a broad range of housing requirements are satisfied.	This Official Plan Amendment and Zoning By-Law Amendment application proposes the “<i>Business District Commercial</i>” Zone for the subject lands, which will permit high-density residential uses as well as a greater variety of commercial uses, implementing the planned function of the “<i>Urban Corridor</i>” Place Type. The proposed development is also considered a transit-oriented development by virtue of its location along an urban corridor and in close proximity to a rapid transit corridor (Highbury Avenue).
<u>Policy 837 - Permitted Uses</u> 837_ The following uses may be permitted within the Rapid Transit Corridor and Urban Corridor Place Types, unless otherwise identified by the Specific-Segment policies in this chapter: 1. A range of residential, retail, service, office, cultural, recreational, and institutional uses	The proposed form of the mixed-use development is contemplated within the “<i>Urban Corridor</i>” Place Type policies. The proposed development plans for office and service uses to front the street at grade, thereby aligning with contemporary urban designs guidelines and policies of The London Plan. The proposed redevelopment facilitates a higher-density, mixed-use building, in an area planned to support higher-order public transit

may be permitted within the Corridor Place Type. - Mixed-use buildings will be encouraged. - Large floor plate, single use non-residential buildings will be discouraged in Corridors. - Where there is a mix of uses within an individual building, retail and service uses will be encouraged to front the street at grade. - The full range of uses described above will not necessarily be permitted on all sites within the Rapid Transit and Urban Corridor Place Types.	systems in the future, in keeping with the general intent and vision of the “Urban Corridor” Place Type. The proposed 18-storey buildings provide a 2-storey podium, and a 104m² area of commercial space within each, consistent with policy 837.
<u>Policy 839 - Intensity</u> 839_ Table 9 shows the minimum height, standard maximum height, and upper maximum height that may be permitted in the Rapid Transit and Urban Corridor Place Types. 840_ The following intensity policies apply within the Rapid Transit and Urban Corridor Place Types unless otherwise identified: - Development within Corridors will be sensitive to adjacent land uses and employ such methods as transitioning building heights or providing sufficient buffers to ensure compatibility. - Commercial buildings should not exceed 6,000m² in size within Corridors. - Lot assembly is encouraged within the Corridor Place Types to create comprehensive developments that reduce vehicular accesses to the street and to allow for coordinated parking facilities. - Lots will be of sufficient size and configuration to accommodate the proposed development and to help mitigate planning impacts on adjacent uses. - Individual buildings will not contain more than 2,000m² of office space, except within 100 metres of rapid transit stations where buildings may contain up to 5,000m² of office space. An aggregate total of no more than 5,000m² will be allowed within 100 metres of a rapid transit station. - As shown on Table 9, greater residential intensity may be permitted within the Rapid Transit Corridor Place Type on sites that are located within 100 metres of a rapid transit station. - High-rise buildings up to the limits set out in Table 9, may be permitted in conformity with the Our Tools policies of this Plan. - The Zoning By-law will include regulations to ensure that the intensity of development is appropriate for individual sites. - The full extent of intensity described above will not necessarily be permitted on all sites within the Rapid Transit and Urban Corridor Place Types	Table 9 of the London Plan specifies that the permitted upper maximum height within the “Urban Corridor” Place Type is 10-storeys; however, as part of a heights review undertaken by the City of London, the “Urban Corridor” Place Type now permits an upper maximum height of 15-storeys, as per Bill No. 312. The heights review was undertaken to impart greater flexibility, opportunity, and availability to increase the supply of housing in prime transit locations across the City of London. The proposed increase in height from 15-storeys to 18-storeys to facilitate the development as proposed is considered appropriate and reasonable given that the subject lands are situated in an area planned for significant growth and density. The proposed 18-storey building height is generally compatible with proximate building heights in the surrounding area, and is the planned and expected built-form in the Urban Corridor Place Type. The subject lands are also in close proximity to the Rapid Transit Corridor along Highbury Avenue, which contemplates similar building heights and form. Thus, the proposed built-form is compatible and a good fit within its context. The subject lands are an appropriate location for increased residential/commercial height and density as the lots are well-served by public facilities including existing and emerging transit infrastructure, commercial/retail areas, and recreational/open space uses. The positioning of the buildings close to Dundas Street will ensure that potential impacts relating to privacy and shadowing will be minimized. The requested special provisions will facilitate a mixed-use development that is efficient, compact, and appropriate for the area. The subject lands consist of four (4) separate parcels of land, which are being consolidated to facilitate the proposed development on a lot that is of sufficient size and configuration.

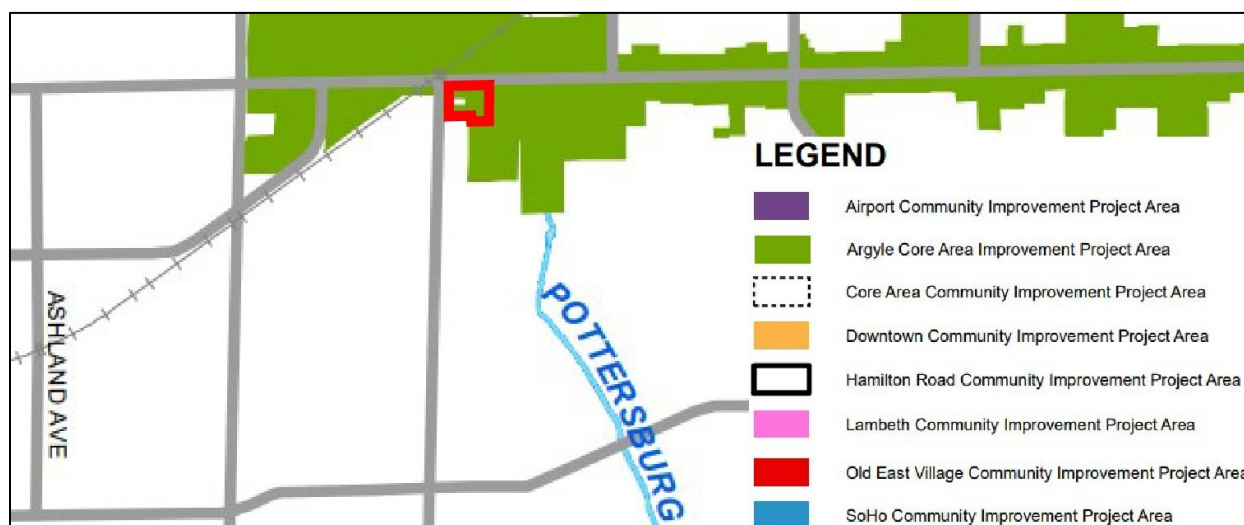
Policy 841 – Form 841_ The following form policies apply within the Rapid Transit and Urban Corridor Place Types: • All planning and development applications will conform with the City Design policies of this Plan. • Buildings should be sited close to the front lot line, to create a pedestrian oriented street wall along Corridors and provide appropriate setback from properties that are adjacent to the rear lot line. • The mass of large buildings fronting the street should be broken down and articulated at grade so that they support a pleasant and interesting pedestrian environment. Large expanses of blank wall will not be permitted to front the street, and windows, entrances, and other building features that add interest and animation to the street will be encouraged. • Development should be designed to implement transit-oriented design principles. • Buildings and the public realm will be designed to be pedestrian, cycling and transit-supportive through consideration of building orientation, location of entrances, clearly marked pedestrian pathways, widened sidewalks, cycling infrastructure and general site layout that reinforces pedestrian safety and easy navigation. • Convenient pedestrian access to transit stations will be a primary design principle within Rapid Transit Corridors. New development adjacent to rapid transit stations and transit stops should make strong, direct connections to these facilities. • On-street parking within Corridors is encouraged wherever possible and when conflicts with public transit services and on-street bike paths can be avoided or mitigated. • While access to development along Corridors may be provided from “side streets”, such accesses to development will be located and directed in a manner that minimizes impacts on the internal portions of adjacent neighbourhoods. • All public works will ensure a high quality pedestrian environment through streetscape improvements which may include widened sidewalks, upgrading the sidewalk material, planting street trees, installing benches and other street furniture, providing pedestrian lighting, and integrating public art. • Planning and development applications will be discouraged if they result in the creation of one or more isolated remnant lots that cannot be reasonably developed or assembled with other parcels in the Place Type to develop in accordance with the long-term vision for the Corridor.	A redevelopment of the subject lands is proposed, involving the demolition of the existing buildings in favour of the development of a two, new 18-storey, mixed-use buildings proposed to contain a total of 340 residential units. City Design policies are responded to in Section 8.2.2 of this report. The proposed contemporary/modern mixed-use development will make a positive contribution to the streetscape with commercial uses on the ground floor and residential units above. The proposed 18-storey building height is generally compatible with nearby building heights in the surrounding area, and is the planned and expected built-form in the “<i>Urban Corridor</i>” Place Type and “<i>Civic Boulevards</i>” Street Classes. Thus, the proposed built-form is compatible and a good fit within its context. The proposed development will provide convenient access to the planned “<i>Major Rapid Transit Station</i>” approximately 250m west of the subject lands. The proposed buildings have been designed to facilitate a comfortable pedestrian experience along the Dundas and Hale Street streetscapes with the podium being 2-storeys in height to ensure a comfortable relationship between the built-form and the public realm. The tower element is set back from the podium to define the street wall. Further, the tower setback from the podium is an effective strategy to mitigate resultant wind, shadow, and sky view impacts on surrounding streets, parks, open space, and properties. The public realm will be significantly improved with the addition of the proposed mixed-use buildings as commercial uses will be provided at-grade, thereby animating the Dundas Street frontage with pedestrian activity. Integrating street tree plantings, street furniture, pedestrian lighting, and public art are all being considered as part of this proposal. Specific materials, plantings and elements are to be refined through the Site Plan Application process. The conceptual site plan and layout has been strategically designed such that the vehicular access driveway is located to the south of the proposed buildings leading to the surface parking area and underground parking structure, all screened from the Dundas streetscape.
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- Where appropriate, block concepts should be developed to provide for rear drive lanes and to coordinate automobile access and circulation. - Surface parking areas should be located in the rear and interior side yard. Underground parking and structured parking integrated within the building design is encouraged. - Buildings will be designed to mitigate the impact of new development on adjacent neighbourhood areas.	
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8.2.1 Argyle Core Area Community Improvement Plan

The Argyle Area Community Improvement Plan is intended to provide City Council with the necessary tools to stimulate reinvestment and redevelopment, inspire appropriate infill and intensification, coordinate planning efforts, improve the physical infrastructure, support community economic development, preserve neighbourhood and cultural heritage value, and lead to the establishment of an improved neighbourhood.

Figure 30 – The London Plan (Map 8 – Community Improvement Project Areas)



Note: Location and boundaries are approximate

As the subject lands have been identified within the Argyle Core Area Improvement Project Area on Map-8, “Community Improvement Project Areas” of the London Plan (Figure 30) , the following guidelines will be used to evaluate the proposed application:

ARGYLE CORE AREA COMMUNITY IMPROVEMENT PLAN	
Guidelines	Response
6 Improvement Categories include/Indicators of Success: Developing high quality public realm;	The proposed development will contribute to the creation of a high-quality public realm along the Dundas/Hale Street corridor with the provision of appropriately scaled, mixed-use buildings, accessible commercial uses at grade, landscaping elements, and private amenity areas.

The Argyle Core Area will have a pedestrian-oriented streetscape and public spaces that are safe, clean, accessible and pleasant. Safer neighbourhood for all; The Argyle Core Area will be a safe accessible, and healthy place to live, visit and work by improving safety and accessibility related issues. Supporting businesses; The Argyle Core Area will have strong, diverse and connected businesses and a business environment that attract visitors, serves the local community, and support business retention, expansion and investment. Enhancing parks and recreational opportunities; Natural features and neighbourhood parks will be enhanced, conserved, and celebrated, and the Argyle Core Area will have a range of recreational amenities and programs. Improved mobility; and, The Argyle Core Area will have an interconnected community-wide transportation network that is safe, convenient, and prioritizes active mobility Strengthening the community. The Argyle Core Area community will continue to develop and maintain strong connections within the community and the City, and built capacity to work strategically with stakeholders to achieve community goals	The proposed development will contribute to the creation of a safer neighbourhood for all by providing passive surveillance opportunities and the enhancement of the public realm with active commercial uses along the streetscape. The proposed development incorporates commercial/retail spaces on the ground floor, therefore, opportunities for investment in the Argyle Community for the establishment of new businesses to serve the locals and visitors are integrated into this development proposal. Further, the addition of approximately 340 residential units to the subject lands will aid in supporting the existing businesses and business retention within the Argyle Community.
Project Sub-Areas – Dundas Street Corridor The Dundas Street Corridor contains lands fronting onto Dundas Street from Highbury Avenue North to Clarke Road. Dundas Street is the main commercial and transit corridor within the Project Area, connecting Veterans Memorial Parkway with the Argyle Mall and Highbury Avenue. The large volumes of traffic including trucks that pass through Dundas Street have contributed to a decline in the quality of the public realm and detract from the street environment policy objectives specified in the London Plan. Dundas Street and its many stores, restaurants and other small businesses are conveniently located and provide residents with most of their day-to-day shopping needs. An effort to rebalance the auto-dominated corridor to provide a more pedestrian friendly environment is a priority. A desire for more safety, cleanliness, additional public spaces to rest and more greenery and street-trees were identified in the first community meeting. The London Plan identifies the Dundas Street Corridor as an Urban Corridor Place Type. Urban Corridors permit a wide range of uses, encourage intensification and mixed-use buildings and support a high-quality pedestrian environment that is pleasant, accessible and safe. As the Dundas Street	The proposed mixed-use development will facilitate an enhanced pedestrian environment and streetscape along this section of the Dundas Street and Hale Street corridor through the provision of landscaping elements, commercial uses at grade, and spaces for pedestrians to rest and connect within and close to the Dundas Street right-of-way. The proposed development will help to facilitate a pedestrian oriented streetscape, in addition to providing convenient opportunities for passive surveillance of the public realm along Dundas Street and Hale Street, thereby improving the safety and comfort for pedestrians and residents of the area.

Corridor is the centre of the Argyle Core Area, it will be the focal point for improvement.	
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8.2.2 City Design Policies

The City Design policies of The London Plan set out general urban design policies that apply to the entire city. It is recommended that this report be read in its entirety, rather than the urban design sections alone, to gather a comprehensive understanding of the merits of the proposed development. The proposed development is consistent with these urban design policies as follows:

City Design – Response To City Documents	
Policy	Response
Section 193 What are we trying to achieve? 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. Healthy, diverse, and vibrant neighbourhoods that promote a sense of place and character.	The proposed development conforms to these goals by providing a development that: • Introduces a new range of unit sizes, layouts, and housing types to the immediate area; • Provides compatible yet distinct design features to integrate well with the surrounding context; • Establishes a residential density that is appropriate to the neighbourhood and results in compact development; • Incorporates multi-unit residential development in an area appropriate for additional residential density; • Significantly enhances the streetscape and pedestrian environment with a well-designed building and landscaped areas situated close to the Dundas/Hale Street frontage; • Incorporates accessible units for individuals with varying levels of mobility, thereby supporting ageing in place, access, housing choice and affordability, given the nature of the proposed development; and, • Features a high-quality private outdoor amenity space for the future residents, in addition to being located in an area with good access to public open space and amenities. 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.
Character	
Section 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.	The proposed development will respect the predominant physical character of the surrounding area by providing a highly articulated, high-rise, mixed-use built-form that is contextually appropriate, and enhances the quality of the existing streetscape and site layout.
Site Layout	

Section 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.	The site layout responds appropriately to the surrounding context of the subject lands, including planned future development with a suitable height, adequate setbacks, circulation, and lot coverage. The proposed development incorporates quality building materials and treatments that are respectful of the local context and character of the surrounding area.
Section 253 Site layout should be designed to minimize and mitigate impacts on adjacent properties.	The conceptual site layout proposes appropriate side and rear yard setbacks from abutting properties, given the context of the site along an “Urban Corridor”. The subject lands will include functional and aesthetically pleasing areas for the future residents of the building, which will generally enhance views of the subject lands from surrounding properties overall. Landscaping and fencing will be implemented through the Site Plan Approval process to provide privacy and screening measures. However, it is noted that due to the height of the building, not all visual impacts can be mitigated.
Section 255 Site layout will promote connectivity and safe movement for pedestrians, cyclists, and motorists between, and within, sites.	The proposed development incorporates new pedestrian connections along the Dundas/Hale Street frontages, which will facilitate safe movement and connectivity on and off the subject lands for the future residents.
Section 256 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, buildings should be sited with regard for the planned street wall or street line.	The proposed building is situated along the northerly property line along Dundas Street and the westernmost property line along Hale Street to establish a street wall and provide continuity along the streetscape.
Section 258 The layout and grading of a site should retain and incorporate desirable trees.	The subject lands contain very few trees or vegetation. The proposed development will replace and incorporate landscaping elements and trees where feasible.
Section 259 Buildings should be sited with minimal setbacks from public streets and public spaces to create an inviting, active and comfortable pedestrian environment.	The proposed building is located close to the public realm with minimal setback to facilitate an active, inviting and comfortable pedestrian environment with the commercial uses at-grade in the mixed-use building.
Section 266 Loading, garbage and other service areas will be located so that they will not have a negative visual impact from the street or detract from pedestrian connections	The proposed building's garbage collection facilities are located underground on the same level as the parking facilities, effectively screening that area from public view.
Section 268 Sites shall be designed to provide a direct, comfortable, and safe connection from the principle building entrance to the public sidewalk.	The proposed development will be accessible directly from Dundas Street and Hale Street with the principle entrance of the building abutting the public realm, providing a safe, comfortable, and direct pedestrian connection.
Section 269 Buildings should be sited to minimize the visual exposure of parking areas to the street	The accessible at-grade parking spaces are planned to be located to the rear of building, effectively minimizing visual exposure to the street.
Buildings	
Section 285 To support pedestrian activity and safety, large expanses of blank wall will not be permitted along the street edge	The proposed building features highly-articulated facades on all sides on the building.

Section 286 Buildings should be designed to achieve human-scale relationships that are comfortable for pedestrians.	The proposed building will establish a height of 60.2 m with a 2-storey podium, which is considered to be a human-scaled height that is comfortable for pedestrians.
Section 287 Within the context of the relevant place type policies, the height of buildings should have a proportional relationship to the width of the abutting public right-of-way to achieve a sense of enclosure.	Given that Dundas Street has an ultimate public right-of-way of approximately 23.3 m, and the mixed-use buildings propose a height of 60.2 m on a “ <i>Civic Boulevard</i> ”, the proposed development responds appropriately to the existing streetscape/public right-of-way width, still creating a sense of enclosure. Additionally, the proposed height responds appropriately to significant planned development and permitted heights within the area.
Section 288 Buildings fronting onto public spaces should establish an edge to provide definition, and a sense of enclosure around, the public space.	The step backs at the 2 nd storey of the proposed building aid in establishing an edge to provide the public realm with a sense of enclosure and definition along this portion of Dundas and Hale Street.
Section 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 roof or a cornice treatment, to hide and integrate mechanical penthouses into the overall building design.	The proposed building is designed to express two components with the base being the first 2-storeys, and the top from the 3rd storey step back to the 18th storey. The first storey of the proposed buildings, with approximately 104 m² of commercial space at-grade in each, will have an active, accessible and inviting relationship with the public realm with a human-scale façade emphasized with ample transparent glass, apparent building entrances, and landscaping elements where possible.
Section 291 Principal building entrances and transparent windows should be located to face the public right-of-way and public spaces, to reinforce the public realm, establish an active frontage and provide for convenient pedestrian access.	The primary commercial entrance is oriented north, towards Dundas Street, with the primary residential entrance oriented west, towards Hale Street. This will help to define and activate the street frontage while providing convenient pedestrian access to the proposed mixed-use building.
Section 295 Residential and mixed-use buildings should include outdoor amenity spaces	Common amenity spaces will be provided through the provision of outdoor terraces/patios and indoor amenity areas.
Section 296 Rooftop utility equipment should be screened from view and integrated into the overall building design.	As shown in the provided conceptual elevations and renderings, rooftop utility equipment is screened from public view.
Section 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.	The step backs proposed at the 2 nd storey provides an appropriate transition to the public realm along Dundas/Hale Street and to the lower density residential uses to the south.
➤ Materials	
Section 301 A diversity of materials should be used in the design of buildings to visually break up massing, reduce visual bulk and add interest to the building designs.	Conceptual cladding materials include glass, architectural paneling, and a variety of accent materials, providing variation and reducing the visual bulk of the building.

Section 302 Materials should be selected for their scale, texture, quality, durability, and consistency within their context	High-quality materials selected for their durability, texture and visual interest for the proposed building include painted concrete, architectural metal paneling, and white/grey cladding and glass/window walls. Although the contemporary/modern style is generally unique to the area, the to-be constructed Humane Society and long-term care home buildings across Dundas Street from the subject lands will be a similar modern/contemporary style to the proposed building with wood-style paneling, flat roof lines and modern finishes, demonstrating consistency with the surrounding context.
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Given the above analysis, the proposed development conforms to the applicable city design policies of The London Plan. As such, the proposed Official Plan Amendment and Zoning By-law Amendment to permit the proposed mixed-use development is considered appropriate and desirable.

8.2.3 Evaluation Criteria for Planning Applications

All planning and development applications will be evaluated with consideration of the use, intensity, and form that is being proposed (Policy 882). The following criteria will be used to evaluate all planning and development applications:

Evaluation Criteria for Planning and Development Applications (Policy 1578)	
<i>Policy</i>	<i>Response</i>
1. Consistency with the Provincial Policy Statement and in accordance with all applicable legislation.	As demonstrated in this report, the proposed Official Plan Amendment and Zoning By-Law Amendment is consistent with the intent and policies of the Provincial Policy Statement.
2. Conformity with the Our City, Our Strategy, City Building, and Environmental policies of this Plan	The proposed Zoning By-Law Amendment conforms with the applicable key directions within the “Our Strategy” chapter of The London Plan, including: planning strategically for a prosperous city by utilizing existing land, infrastructure, and resources. Furthermore, the proposed application is generally consistent with the growth framework outlined in the “Our City” chapter in The London Plan as no environmental features are identified on the subject lands; and as such, the “Environment” chapters of The London Plan are not reviewed as part of this report.
3. Conformity with the policies of the place type in which they are located.	As demonstrated in this report, the proposed Official Plan Amendment and Zoning By-Law Amendment generally conforms to the policies of the “Urban Corridor” Place Type.
4. Consideration of applicable guideline documents that apply to the subject lands.	Guidelines of the Argyle Area Community Improvement Plan have been considered as part of this report.
5. The availability of municipal services, in conformity with the Civic Infrastructure chapter of this Plan and the Growth Management/Growth Financing policies in the Our Tools part of this Plan.	The subject lands have access to available municipal services.
6. Potential impacts on adjacent and nearby properties in the area and the degree to which such impacts can be	a. Traffic and access management

managed and mitigated. Considering the type of application under review, and its context, an analysis of potential impacts on nearby properties may include such things as: a. Traffic and access management. b. Noise. c. Parking on streets or adjacent properties. d. Emissions generated by the use such as odour, dust, or other airborne emissions. e. Lighting. f. Garbage generated by the use. g. Privacy. h. Shadowing. i. Visual impact. j. Policy Deleted. k. Trees and canopy cover. l. Cultural heritage resources. m. Natural heritage features and areas. n. Natural resources. o. Other relevant matters related to use and built form	Response: Dundas Street and Hale Street will provide vehicular and pedestrian access to the proposed mixed-use building. No significant traffic impacts to other nearby properties are anticipated. Areas north and west of the subject lands (Highbury Avenue North, Dundas Street and Hale Street) facilitate high-traffic volumes, therefore, the addition of the proposed commercial space and residential units will have a low impact on traffic volumes and accesses to adjacent properties. Overall, the proposed development will enhance the character of the streetscape by addressing the road through building design and pedestrian access. b. Noise Response: No significant noise impacts on abutting lands are anticipated due to the predominant residential nature of the proposed development. Generally, apartment buildings do not emit significant volumes of noise. Lands to the north, east, west and south are generally comprised of commercial/office uses, with residential uses to the south. Given the significant noise generated from vehicles in and around the area, it is unlikely that the proposed development would add any significant noise beyond the existing volumes. Rather, it is likely that the building would block noise generated from Dundas Street to the lands to the south, improving local noise characteristics. c. Parking on streets or adjacent properties Response: As the proposed development adheres to general parking standards, visitors are unlikely to utilize on-street parking nearby. Parking spaces provided are considered sufficient for the requirements of the development. d. Emissions generated by the use such as odour, dust, or other airborne emissions Response: No odour, dust, or other airborne emissions will be generated by the subject lands. e. Lighting Response: A Photometric Plan was not requested by Staff as part of a complete application. One will be required for a future Site Plan Approval application, however. f. Garbage generated by the use Response: Garbage generated by the proposed development will be collected internal to the building in a garbage room. g. Privacy Response: No significant or undue impacts to the privacy of abutting and adjacent lands are anticipated, as the proposed development has strategically provided step-backs, window locations and accesses to ensure privacy of the residents and neighbours. However, it is acknowledged that due to the height of the building, it will be visible to adjacent properties. This is expected given the policy intent of the Urban Corridor Place Type. h. Shadowing Response: A Shadow Study was not requested by Staff as part of a complete application. Given that the subject
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	lands are located on the south side of the street, and north of most nearby low density uses, shadowing is not anticipated to be significant. i. Visual impact Response: The subject lands currently contain vacant buildings and gravel/asphalt parking areas with little to no existing vegetation. The addition of the proposed building will make for a valuable contribution to the Dundas/Hale Street streetscape. The proposed mixed-use building will create a strong street presence with a minimal front yard setback and parking located to the rear of the building. The building is appropriate and compatible with existing built forms near the subject lands. Additionally, the rear yard of the lot will be developed into an amenity area for the residential units, thereby enhancing the visual appeal of the subject lands and creating privacy for residents. Creating attractive amenity spaces in the area will have a positive impact on abutting and adjacent properties. j. Trees and canopy cover. Response: Little to no vegetation/trees currently exist on the subject lands. Landscape design details will be refined through the site plan process. k. Cultural heritage resources. Response: A Stage 1 & 2 Archaeological Assessment was requested by Staff as part of a complete application. The Archaeological Assessment did not find any resources on site. l. Natural heritage features and areas. m. Natural resources. Response: There are no natural heritage features or natural resource features on the subject lands.
7. The degree to which the proposal fits within its context. It must be clear that this is not intended to mean that a proposal must be the same as development in the surrounding context. Rather, it will need to be shown that the proposal is sensitive to, and compatible with, its context. It should be recognized that the context consists of existing development as well as the planning policy goals for the site and surrounding area. Considering the type of application under review, and its context, an analysis of fit may include such things as: a. Policy goals and objectives for the place type. b. Policy goals and objectives expressed in the City Design chapter of this Plan. c. Neighbourhood character. d. Streetscape character. e. Street wall. f. Height. g. Density. h. Massing. i. Scale. j. Placement of building. k. Setback and step-back. l. Relationship to adjacent buildings. m. Proposed architectural attributes	a. Policy goals and objectives for the place type. b. Policy goals and objectives expressed in the City Design chapter of this Plan. Response: The proposed Official Plan Amendment and Zoning By-Law Amendment has been demonstrated to generally conform with the applicable place type and design policies of The London Plan. The proposed Official Plan Amendment/Zoning By-Law Amendment is appropriate for the subject lands and compatible with the existing range of uses in the surrounding area. The City Design policies are addressed in this report as the subject lands interfaces with the public right-of-way along Dundas Street and Hale Street. c. Neighbourhood character Response: The subject lands are an appropriate location for a mixed-use building by virtue of the location within the "Urban Corridor" Place Type and along a "Civic Boulevard"; their proximity to transit infrastructure; commercial shopping areas; and, public service facilities. As the proposed use is similar in nature to the existing surrounding land uses, the established character will be generally maintained and enhanced, and the proposed use will have a positive impact on surrounding lands. d. Streetscape character.

such as windows, doors, and rooflines. n. Materials. o. Relationship to cultural heritage resources on the site and adjacent to it. p. Landscaping and trees. q. Coordination of access points and connections.	Response: The streetscape along Dundas and Hale Street will be significantly improved by replacing an existing parking area and vacant buildings with a well-designed building that is setback appropriately from the street. The parking and amenity area for the development are proposed to be located in the rear yard of the site; therefore, the proposal will maintain streetscape compatibly with surrounding commercial uses, while increasing the range and mix of housing options available in the area. e. Street wall. f. Height. g. Density. Response: Low, medium and high-density residential uses are common in the surrounding context of the subject lands. The subject lands are well-suited to support the proposed residential density by virtue of the building's location next to non-sensitive land uses to the north, west and east and adequate setbacks from nearby residential uses to the south. h. Massing. i. Scale. j. Placement of building. Response: As the proposed building is situated close to Dundas and Hale Street (a standard contemporary urban design practice) with parking provided in the rear yard of the building and underground, the dwellings are consistent with the positioning and site layouts of the other apartment buildings nearest to the subject lands and established street wall. Therefore, the proposed development will be generally consistent with existing and planned building placements on nearby lots. k. Setback and step-back. l. Relationship to adjacent buildings. Response: The proposed setbacks, height, building separation and landscaped details noted on the Concept Plan respect the surrounding built form to ensure potential impacts are minimized. m. Proposed architectural attributes such as windows, doors, and rooflines. Response: The architectural style of the proposed building is modern and contemporary, with a flat roofline and standardized use of building materials, windows, and functional architectural features. These features will be a positive addition to the streetscape. n. Materials. Response: Conceptual cladding materials include glass, architectural paneling, and a variety of accent materials will be provided as part of the overall building design. o. Relationship to cultural heritage resources on the site and adjacent to it. Response: There are no cultural heritage resources on or adjacent to the subject lands. p. Landscaping and trees. Response: Landscape details have been provided on the Conceptual Site Plan. q. Coordination of access points and connections.
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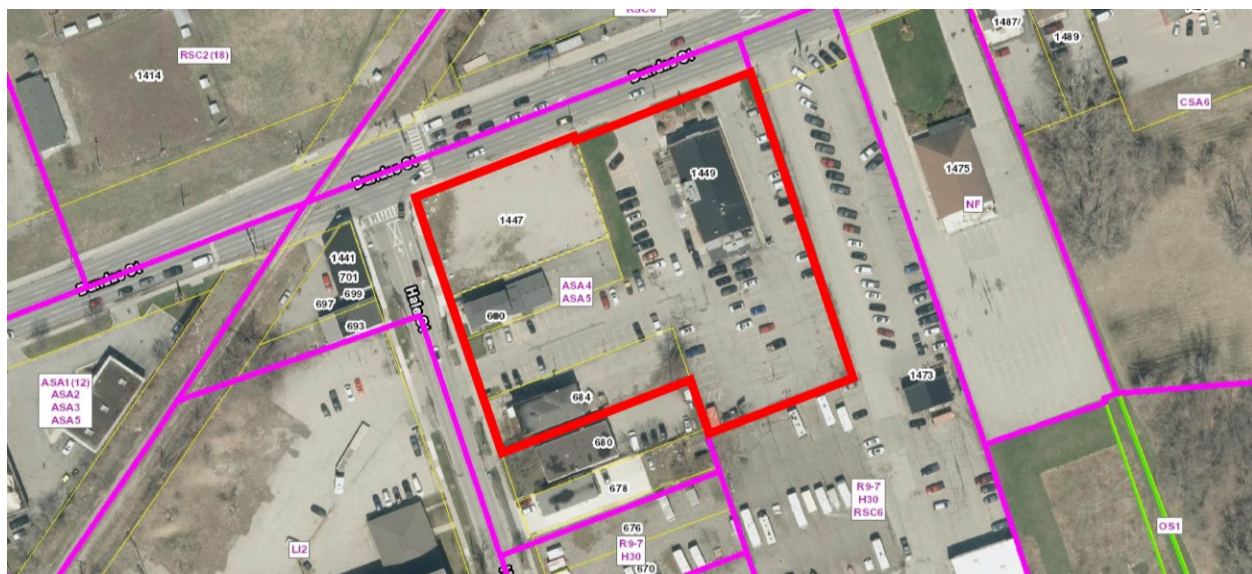
Response: The commercial vehicular access point along Dundas Street will remain as is. The residential Hale Street access is to be located on 684 Hale Street.

Based on the above, the proposed development represents an appropriate and compatible form of mixed-use development at an appropriate location. The proposed development is generally consistent with the planned function of the “Urban Corridor” Place Type, is in conformity with the land use policies of The London Plan, and is a desirable use for the subject lands.

8.3 City of London Zoning By-law

The subject lands are currently zoned “Arterial Commercial 4” (AC4) in the in the City of London Z.-1 Zoning By-Law (Figure 31). The current zone permits accessory dwelling units; converted dwellings; day care centres; emergency care establishments; existing dwellings; group home type 2; lodging house class 2; animal hospitals; dwelling units, above the first floor; clinics; convenience stores; convenience service establishments; duplicating shops; florist shops; medical/dental laboratories; medical/dental offices; offices; personal service establishments; and, studios. While the “AC4” Zone permits some commercial uses and residential units above the first floor, the provisions of the “AC4” Zone do not permit Phase 1 of the development of the proposed intensity of 395 UPH and height of 18-storeys, therefore, a Zoning By-Law Amendment is required.

Figure 31 – The subject lands identified on the City of London’s interactive zoning map (excerpt)



The “Business District Commercial” Zone is requested to be applied to the subject lands to permit the proposed mixed-use building as it is the most appropriate zone to implement the planned function of the “Urban Corridor” Place Type. However, the proposed height and front/side yard setbacks are not permitted under the current “BDC” zoning regulations. As such, a site-specific, “Business District Commercial (BDC(_))” Zone is required to permit the proposed development.

Table 1 provides a breakdown of the regulations for the “BDC” zone and the requested, site-specific “BCD()” 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

	BDC Zone	BDC () Zone
Regulation	Required	Proposed
Permitted Uses	Apartment buildings, with any or all of the other permitted uses on the first floor	Residential apartment building with commercial uses on the first floor
Lot Area (m2)	N/A	8,603 m ²
Lot Frontage (M) Minimum	8.0m	70.1 m
Lot Depth (M) Minimum	N/A	103.7 m
Front Yard Depth (M)	3.0m - Maximum 0.0m - Minimum	3.8 m*
Rear Yard Depth (M) Minimum (Abutting a Residential Zone)	3.0 m plus 1.2 m for each 3.0 m of building height or part thereof above the first 3.0 m = 25.9m	11.8m*
Exterior Side Yard (M) Minimum (Abutting a Non-Residential Zone) (North)	0.0m	1.0 m
Interior Side Yard (M) Minimum (Abutting a Non-Residential Zone) (South)	0.0m	26.1 m
Landscaped Open Space (%) Minimum	N/A	22% (1911 m ²)
Lot Coverage (%) Maximum	70%	29%
Height (m) and Density (units/ha) of Apartment Buildings	Established through ZBA Application as per Section 25.3.3	Height – 60.2 m* Density – 395 UPH
Parking	Residential/0.5 per unit = 170 spaces Barrier Free – 1 + 3% = 9 spaces	309 spaces (10 Barrier Free spaces)
	Commercial/1 per 20m ² = 20 spaces Barrier Free 4% of total = 1 space	4 standard spaces* 1 Barrier Free space
Residential Bike Parking	306 Long-Term spaces 34 Short-Term spaces	310 Long-Term spaces 42 Short-Term spaces
Commercial Bike Parking	5 Short-Term spaces	14 Short-Term spaces
EV Charging Spaces	5% (17 spaces)	Ground – 8 spaces P1 – 10 spaces

*Denotes required special provision

The proposed Zoning By-law Amendment application seeks to re-zone the subject lands to a site-specific, special regulation “Business District Commercial (BDC())” zone, with site-specific provisions as follows:

- Maximum front yard depth of 3.8 m;
- Maximum height of 60.2m (18-stories);
- Minimum rear yard depth of 11.8 m;
- Minimum of 4 commercial parking spaces; and,
- Maximum density of 395 UPH.

Analysis as to the appropriateness of the requested site specific regulations identified above is presented below:

The regulations proposed for the “BDC ()” zone are standard, except for the specific regulations relating to the front and side yard setback, height, density, and commercial parking spaces. The City of London Z.-1 Zoning By-law states that the height and density of each apartment building over the standard zone height and/or containing units outside existing structures will be established through a Zoning By-law Amendment application.

Density

The height and density of each proposed apartment building over the standard zone height and/or density within existing structures, is established through a Zoning By-law Amendment within the “BDC ()” Zone. As such, the proposed Zoning By-law Amendment seeks to establish a density of 395 UPH on the subject lands. It is important to note that the London Plan, which came into effect after the current Zoning By-law, does not contain any policies relating to minimum or maximum density requirements; however, the City of London Zoning By-law has not yet been updated to comply with the more recent policy direction. Notwithstanding, the proposed special provision aligns with the policy direction to make efficient use of land and promote appropriate residential development in that it will facilitate an appropriate and efficient increase in rental availability in the City of London. The proposed built form is compatible with surrounding land uses and planned development for the area. The proposed apartments will enhance the vibrancy and safety of the area, as well as provide additional population to support the existing shops and services currently offered on Dundas Street and in the Argyle Community overall. The proposed density of 395 UPH is appropriate and compatible with the area and surrounding context of the subject lands.

Height

The height and density of each proposed apartment building over the standard zone height (12.0m) and/or density within existing structures, is established through a Zoning By-law Amendment within the “BDC ()” Zone. As such, the proposed Zoning By-law Amendment seeks to establish a permitted height of 60.2m on the subject lands. The proposed building height (18-storeys) exceeds the currently permitted 10 storeys in the London Plan’s “Urban Corridor” Place Type. The subject lands are an appropriate location for increased residential/commercial height and density as the lots are adjacent to a “Civic Boulevard” (Dundas Street) that intersects with a “Neighbourhood Connector” (Hale Street), and are well-served by public facilities including transit, commercial/retail areas, and recreational/open space uses. The positioning of the buildings close to Dundas Street will ensure that potential impacts relating to privacy and shadowing will be minimized. The requested special provisions will facilitate a mixed-use development that is efficient, compact, and appropriate for the area.

Setbacks

The requested special provision to permit a reduced rear yard setback of 11.8 m to the east provides ample building separation of approximately 36.9m to the existing Church (1475 Dundas Street) in the lots abutting the subject lands to the east. The requested zone would typically require a 25.9 m rear yard setback for a building of the proposed height (60.2m); however, the proposed setback of 11.8 m leaves sufficient space to include screening mechanisms, such as landscaping and fencing, to ensure the potential impacts of privacy and shadowing on adjacent properties is minimized. With the above noted considerations, an 11.8 m rear yard setback is considered reasonable, appropriate, and will facilitate a development that is well-suited to the area.

A special provision to permit an increased front yard setback of 3.8 m is proposed, whereas 3.0 m is the maximum setback as per the City of London Zoning By-law. A slight increase in front yard setback along Hale Street allows for sufficient space to provide the primary residential entrance equipped with bike racks, an outdoor amenity area, and landscaping elements/tree plantings. As the proposed development is generally in line with the apartment building to the south of the subject lands, the increased front yard setback helps to maintain visual continuity and will enforce the established street wall along this section of Hale Street. Notably, the proposed development incorporates a minimal setback of 1.0m along Dundas Street, providing direct points of access to the commercial uses proposed at-grade. With the above noted considerations, a 3.8 m front yard setback is considered appropriate, and will help facilitate a development that is well-suited to the area.

Parking

A special provision to permit a reduced commercial parking supply of 4 spaces is proposed, whereas 20 spaces (1 space per 20m² of floor area) is required to be provided as per the City of London Zoning By-law. While the proposed parking supply does not meet the zoning requirement, the supply in our opinion is sufficient to meet the needs of the buildings' retail space, especially given the subject lands' location near a planned major transit hub. Additionally, the proposed development offers approximately 1 vehicular space per unit, whereas only 0.5 spaces per unit is required, therefore, the residential parking supply is well-equipped to accommodate additional commercial parking needs given the transitory nature of parking requirements for retail uses. As such, the proposed special provision is considered appropriate for the subject lands and represents good land use planning. Based on the findings of this report, the proposed mixed-use development fulfills a planned function of the subject lands in the "Urban Corridor" Place Type. The London Plan intends for a broad range/mix of uses, specifically residential, to be implemented in these areas.

Overall, the requested "*Business District Commercial* (_)" zone is considered an appropriate zone for implementing the proposed development and associated Zoning By-law Amendment application.

9.0 ADDITIONAL CONSIDERATIONS

Development of the subject lands for the proposed 18-storey, mixed-use buildings will be noticeable to residents in the neighbourhood. Impacts to the property will consist of:

Visual and Privacy: Nearby residents will see the upper floors of the 18-storey buildings from their property. Some of the residential properties abutting the subject lands to the south and southeast will be visible from the proposed building. Proper landscaping buffers and privacy fencing will be utilized to minimize the visibility of the development from abutting properties.

Auditory: Sounds, from such sources as vehicles, conversations, children, and normal residential activities will be audible to abutting residents.

Light: Light from night-time lighting of the building and parking/amenity area may be noticeable to abutting properties; however, this is limited by site design, and can be further mitigated by landscaping and fencing. Care will be taken to limit adverse lighting impacts on adjacent properties where possible.

Traffic: In conjunction with the proposed building, there will be a minor increase in vehicular movement along Dundas Street and Hale Street with residential parking and refuse collection trucks entering and leaving the subject lands. However, the increase in traffic is to be minor and will have no noticeable impact on Dundas/Hale Street.

Impacts to the broader community, even to properties close by, but which do not abut the subject lands will be much less evident. Such impacts will generally be limited to minimal viewing of the development from properties in the surrounding area, and a minor increase in vehicular movement along Dundas/Hale Street, and the surrounding roads present in the neighbourhood.

10.0 SUPPORTING REPORTS, MATERIALS, AND PLANS

10.1 Public Consultation Strategy

It is proposed that the public consultation process for the proposed applications follow the statutory requirements as set forth in the *Planning Act*. The following procedure of public consultation is proposed:

- Adequate information and material, including a copy of the proposed development, to be made available to the public; and,
- A public meeting be held for the purpose of giving the public an opportunity to make representations in respect of the proposed development.
- An open house was held on March 27, 2025 for the purpose of giving the public an opportunity to review and ask questions about the information and material made available; Invitations were sent to the nearby residents and other interested parties;
 - Approximately 9 individuals from the neighborhood were in attendance, along with City staff and Councillor Shawn Lewis;

- Overall, the response from nearby residents was positive and we did not receive any negative feedback.

The consultation strategy was proposed to provide members of the public with meaningful opportunities to review, understand, and comment on the proposed development and associated applications, which was achieved with the Public Open House, subject to any further comments that may be received prior to Council consideration of the Official Plan Amendment and Zoning By-law Amendment.

10.2 Railway Consultations

10.2.1 Canadian National Railway (CNR)

Zelinka Priamo Ltd. initiated consultation with CNR in October of 2023 by notifying them of the project's scope and requesting any preliminary comments or requirements. A document noting "*Principal Main Line Requirements*" for development of sensitive uses in proximity to railway corridors was provided. The "*Guidelines for New Development in Proximity to Railway Operations*" was also reviewed for compliance as part of this application.

In the vicinity of the subject site, the CN rail line crosses a major street intersection (Dundas/Hale) at a 45 degree angle. A 2-storey building on the southeast corner of Dundas and Hale Street provides a barrier for northeast-bound trains, mitigation relates to protection from southwest-bound trains. Between the rail line and the proposed buildings on the subject site are 5 lanes of traffic on Dundas Street and 3 lanes on Hale Street. As traffic stops at the signalized rail crossing, the closest point to the rail is a public transit bus stop. Figures 32 and 33 show a "crash wall" in a location and track-parallel orientation generally addressing the guidelines. The application of the safety barrier requirement to this location would result in an awkward and ineffectual arrangement. Public safety is not served by this type of barrier because the subject site does not share a property boundary with the rail corridor, nor do any of the property lines for the subject lands run parallel to the rail corridor; therefore, mitigation in the form of a physical barrier is not possible or practical on the subject site.

The only effective way to reduce the risk to public safety would be for a safety berm to be located in the triangular property on the north side of Dundas Street, east of the CNR tracks, currently occupied by advertising billboards.

Explanations of our approach to addressing the requirements is provided in the table below:

<i>Principle Main Line Requirements - CN</i>	
<i>Requirement</i>	<i>Response</i>
<i>Safety setback of habitable buildings from the railway rights-of-way to be a minimum of 30 metres in conjunction with a safety berm. The safety berm shall be adjoining and parallel to the railway rights-of-way with returns at the ends, 2.5 metres above grade at the property line, with side slopes not steeper than 2.5 to 1.</i>	The proposed building is set back 30m from the CNR. The identified 30m setback and safety barrier are shown in Figures 32-33 on page 45 and 46 of this report. Considering the context of the subject lands, being separated from the CNR lands by a public right-of-way (Dundas Street), it is our opinion that the safety barrier is not a practical solution in the proposed location due to the configuration of the subject lands, and would not

	result in any meaningful mitigation, as noted above. Therefore, we believe this mitigation measure is not necessary nor feasible, and are proposing to not include this in the development. It is our opinion that the provided 30m setback accomplishes the intent and purpose of this guideline.
<i>The Owner shall engage a consultant to undertake an analysis of noise. At a minimum, a noise attenuation barrier shall be adjoining and parallel to the railway rights-of-way, having returns at the ends, and a minimum total height of 5.5 metres above top-of-rail. Acoustic fence to be constructed without openings and of a durable material weighing not less than 20 kg. per square metre of surface area. Subject to the review of the noise report, the Railway may consider other measures recommended by an approved Noise Consultant.</i>	SLR Consulting conducted a Noise and Vibration Study in support of the proposed development. Noise impacts with the common at grade outdoor amenity areas, are predicted to exceed the applicable guidelines. With the inclusion of noise barriers transportation noise can be reduced to normally acceptable levels in the context of urban development, as outline in Section 2.4.4 of the enclosed report. - Ventilation and warning clause requirements are outlined in Section 2.5, and summarized as follows: - Installation of central air conditioning and a Type D warning clause are recommended for all units on the proposed development, as outlined in Section 2.5. - As acoustic barriers are required to reduce transportation noise levels within at grade amenity areas, a Type B warning clause is required for the proposed development as outlined in Section 2.5. - The warning clauses should be included in agreements registered on Title for the residential units and included in agreements of purchase and sale/rental agreements. Warning clause requirements are summarized in Appendix C of the enclosed report.
<i>Ground-borne vibration transmission to be evaluated in a report through site testing to determine if dwellings within 75 metres of the railway rights-of-way will be impacted by vibration conditions in excess of 0.14 mm/sec RMS between 4 Hz and 200 Hz. The monitoring system should be capable of measuring frequencies between 4 Hz and 200 Hz, ± 3 dB with an RMS averaging time constant of 1 second. If in excess, isolation measures will be required to ensure living areas do not exceed 0.14 mm/sec RMS on and above the first floor of the dwelling.</i>	Vibration transmission was evaluated by SLR Consulting and the results were noted in their report as follows: Twelve train pass-by events were identified during the approximate 5-day measurement program, based on a review of vibration measurements and trail cam photographs. One event was noted to exceed the RMS vibration level of 1.4 mm/s since SLR was not present during this measurement, it is expected this event is abnormal and does not represent the typical event. All other measurements are predicted to be within the vibration criteria for the proposed development. Therefore, ground borne vibration induced by rail traffic movements is not of concern at the proposed development
<i>The Owner shall install and maintain a chain link fence of minimum 1.83 metre height along the mutual property line.</i>	Not applicable. The CNR and subject lands do not share a mutual property line.
<i>The following clause should be inserted in all development agreements, offers to purchase, and agreements of Purchase and Sale or Lease of each dwelling unit within 300m of the railway right-of-way: "Warning: Canadian National Railway Company or its assigns or successors in interest has or have a rights-of-way within 300 metres from the land the subject hereof. There may be alterations to or expansions of the railway facilities on such rights-of-way in the future including the possibility that the railway or its assigns or successors as aforesaid may expand its operations, which expansion may affect the living environment of the residents in the vicinity, notwithstanding the inclusion of any noise and</i>	Acknowledged.

vibration attenuating measures in the design of the development and individual dwelling(s). CNR will not be responsible for any complaints or claims arising from use of such facilities and/or operations on, over or under the aforesaid rights-of-way."	
Any proposed alterations to the existing drainage pattern affecting railway property must receive prior concurrence from the Railway and be substantiated by a drainage report to the satisfaction of the Railway.	Alterations to the existing drainage patterns affecting the railway are not anticipated as part of this development. More details will be provided at the Site Plan Application stage.
The Owner shall through restrictive covenants to be registered on title and all agreements of purchase and sale or lease provide notice to the public that the safety berm, fencing and vibration isolation measures implemented are not to be tampered with or altered and further that the Owner shall have sole responsibility for and shall maintain these measures to the satisfaction of CN.	Acknowledged.
The Owner shall enter into an Agreement with CN stipulating how CN's concerns will be resolved and will pay CN's reasonable costs in preparing and negotiating the agreement.	Acknowledged.
The Owner shall be required to grant CN an environmental easement for operational noise and vibration emissions, registered against the subject property in favour of CN.	Acknowledged.

Figure 32 – CN crash wall indicated on site plan (excerpt)

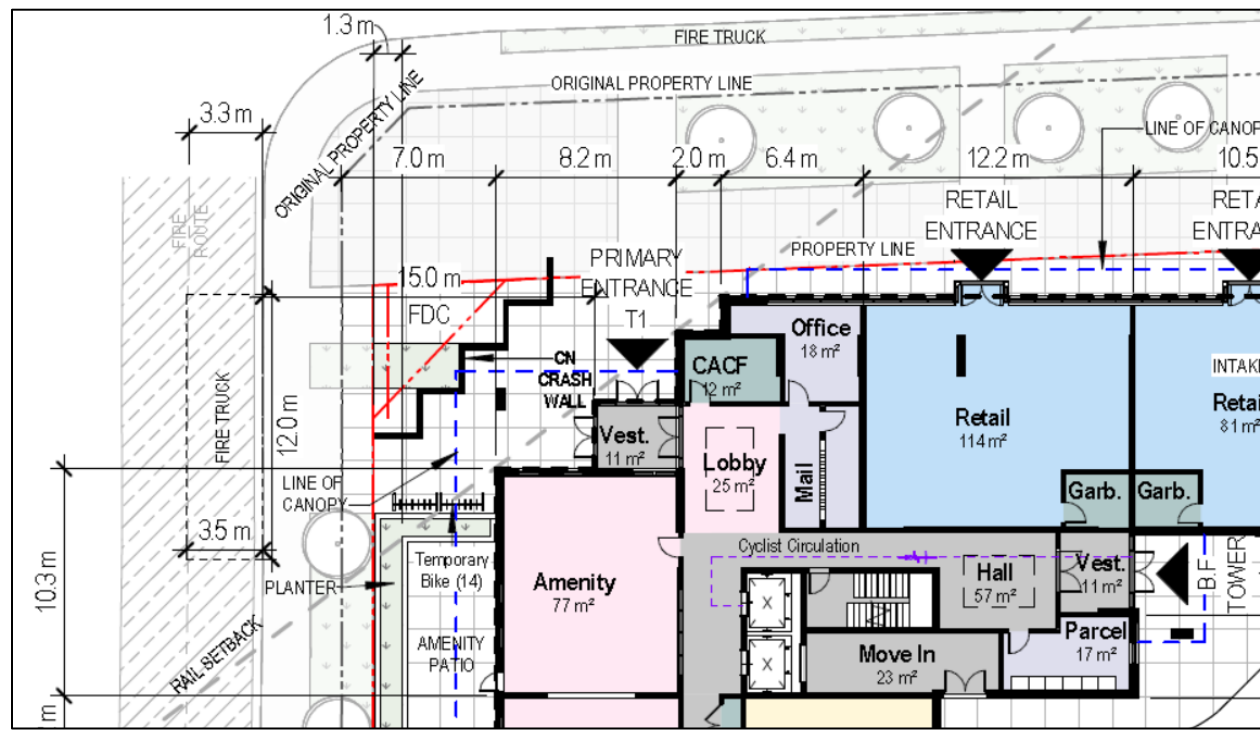
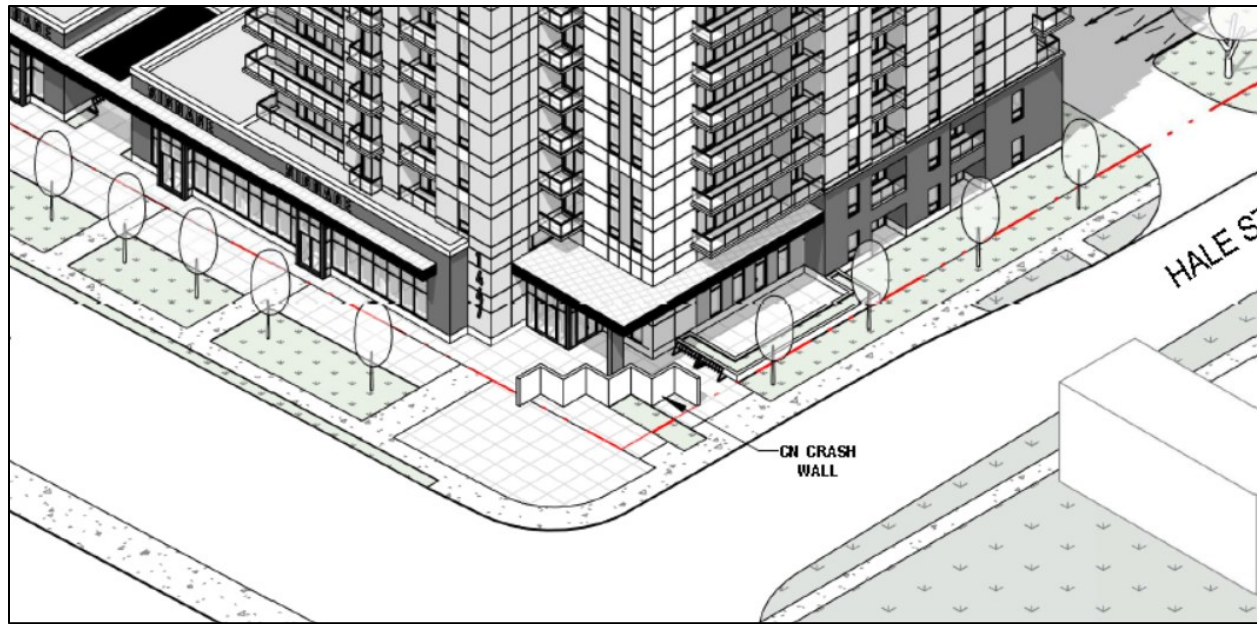


Figure 33 – CN crash wall rendering (excerpt)



10.2.1 Canadian Pacific Railway (CPR)

Zelinka Priamo Ltd. initiated consultation with CPR in June of 2023 by notifying them of the scope of the project and requesting any preliminary comments or requirements. With no response received, a request for comment was initiated again in May and June of 2025. Comments have yet to be received from CPR. However, the location of the CPR line nearest to the subject lands is approximately 230m north. Considering this distance, the mitigation measures relating to noise attenuation are anticipated to be less than required for the CNR line, and these will be appropriate in addressing any potential impacts from the more distant, CPR line to the north.

10.3 Technical Studies

The proposed development is supported by the following technical reports:

10.3.1 Stage 1 & 2 Archaeological Assessment

The Archaeological Assessment (February 2024) completed by LEC includes the following:

- Stage 1; that determined the study area exhibits potential for the identification and recovery of archaeological resources, and recommended a Stage 2 Assessment be conducted; and,
- Stage 2; no archaeological resources were identified during the Stage 2 archaeological assessment of the study area, and as such no further archaeological assessment of the property is recommended.

Further details regarding methods used, are provided in the attached report.

10.3.2 Sanitary/Water Servicing Brief

The Sanitary Servicing Brief (May 2025) completed by MTE concludes the following regarding servicing capacity:

- Hale Street sanitary sewer capacity analysis was performed based on the existing sanitary sewer information and the proposed population. Based on MTE's analysis of the existing sanitary sewer the downstream sewer has sufficient capacity to service the proposed development.
- The modeling and summary of critical results provided in the enclosed report confirms that the existing municipal water network and proposed watermain servicing the proposed developments meets the requirements of the City of London.

Further details are provided in the attached brief.

10.3.3 Traffic Impact Assessment

The Traffic Impact Statement (February 2025) completed By Paradigm Transportation Solutions Ltd. concludes the following:

- Based on the findings and conclusions of this study, it is recommended that the proposed development consider the below Traffic Distance Management measures and be considered for approval:
 - On-site walkways with connections between main building entrances and the existing municipal sidewalks;
 - Short-term and long-term bicycle parking on-site which exceeds the minimum Zoning By-law requirements for residential and commercial uses; and
 - Access to multiple bus transit routes and the future BRT service that provides good connectivity to the broader network and access to major destinations.

In addition to the above, the following measures are appropriate for consideration:

- Parking unbundled from the sale/rent of apartment units;
- Carshare space/vehicle(s) in a premium location on-site; and
- Transit, carshare, and active transportation information provided in a welcome package to new residents and/or posted in central locations on-site.

Further details are provided in the attached brief.

10.3.4 Noise and Vibration Study

The Noise and Vibration Study (May 2025) completed By SLR Consulting concludes the following:

- Impacts of the environment on the proposed development can be adequately controlled without upgrades to the building construction, without the inclusion of mitigation measures for surrounding stationary sources, and the inclusion of ventilation and warning clause requirements, detailed in Part 1 of the enclosed report.
- Impacts of the proposed development on itself are not anticipated and can be adequately controlled by following the design guidance outlined in Part 2 of the enclosed report.

- Impacts of the proposed development on the surroundings are expected to meet the applicable guideline limits, and can be adequately controlled by following the design guidance outlined Part 3 of the enclosed report.
- As the mechanical systems for the proposed development have not been designed at the time of this assessment, the acoustical design should be reviewed by an acoustical consultant later in the approvals process or as part of the final building design.

Further details are provided in the enclosed study.

10.3.5 D-6 Analysis

At the request of the City of London, a preliminary D-6 Guideline Analysis was completed by Zelinka Priamo Ltd. in May of 2025 due to the proximity of the proposed development to existing industrial lands uses. The map displayed in Figure 34 on the next page indicates that four, Class 1 industrial facilities (Russel Metals Inc. (#1), MacMaster Chevrolet Body Shop (#2), Taurus Stampings Inc. (#3), Brinks Canada (#4)), are located within 500m of the proposed development.

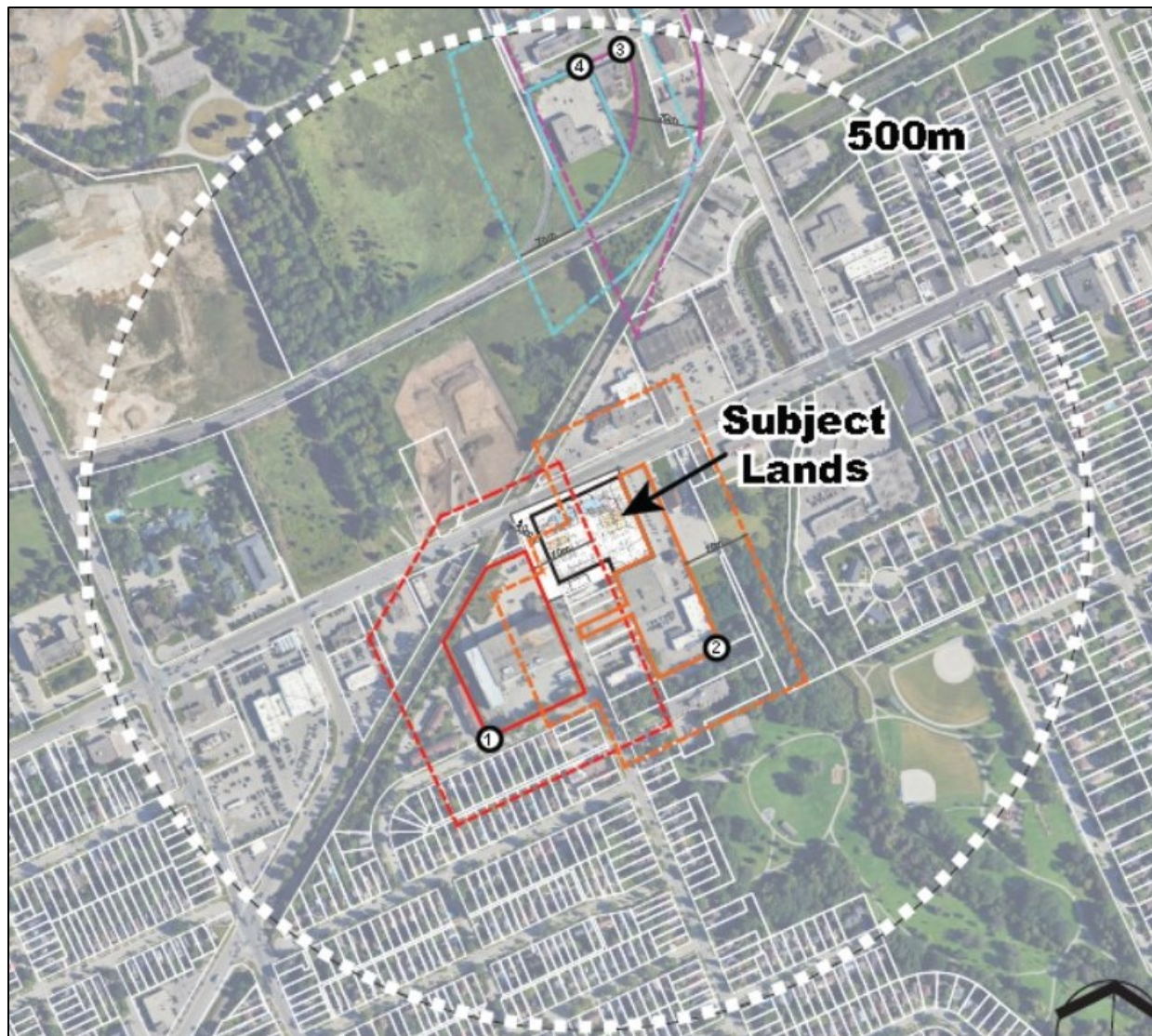
For proposals involving infilling and/or transition to a mixed-use where it may not be possible to achieve the recommended minimum separation distances, Section 4.10 of the D-6 Guidelines provides that such a proposal may be acceptable through a justifying impact assessment that evaluates the off-site impacts of industrial processes on proposed sensitive lands uses; and recommends the necessary mitigation measures to lessen the impacts.

SLR Consulting (Canada) Ltd. ("SLR") was retained by Holdco Holdings Inc. to assess and prepare the Noise and Vibration Study for the proposed development. Results of this study and recommended mitigation measures will be referenced throughout this section.

Class 1 industrial uses have a potential influence area of approximately 70m according to the recommended minimum separation distances set out in Section 4.3 Ministry Guideline D-6, Compatibility between Industrial Facilities ("D-6 Guidelines"). As such, each industrial Class 1 use identified within 500m of the subject lands was buffered by 70m to identify and evaluate potential impacts to the proposed development (Figure 34 on the next page).

The potential area of influence for the industrial facility "#1" indicated on Figure 32 and located at 685 Hale Street intersects with the westernmost half of the subject lands' lot area. Russel Metals Inc. is regarded as a Class 1 industrial facility given that the site is used for the distribution of steel and is self-contained with minimal, off-site impacts. Known impacts from the site include truck maneuvering and idling, which is assumed to occur at any hour of the day. No significant rooftop sources of noise were identified. A service commercial use in the form of an automotive body shop identified as #2 on Figure 32. While not classified as an industrial use, automotive body shops have some associated noise outputs, including an HVAC unit; a paint booth exhaust stack; an exhaust fan; and four bay doors with air compressors and impact wrenches. Sound levels from all other stationary sources are predicted to be meet the applicable guideline limits at all locations in the proposed development. Therefore, additional noise control measures are not required based on the findings of the Noise and Vibration Study.

Figure 34 – D-6 Analysis Map



Facility #3 (Taurus Stampings Inc.) is a steel stamping and drawing service that operates with hydraulic presses interior to the building. No known noise or vibration impacts are associated with this use. Industrial facility #4 (Brinks Canada) is a transportation service with associated truck movements occurring at anytime of the day. Both industrial facilities and associated 70m potential area of influence do not intersect with the subject lands', therefore, no impacts are anticipated from the above noted facilities. While these facilities were not evaluated by SLR Consulting, are zoned for as "*Light Industrial 1*" and warranted evaluation based on the D-6 Guidelines.

Based on the above, the proposed development can be considered compatible with nearby industrial uses based on their limited noise outputs, and mitigation measures to be included in the building's design. The proposed mixed-use development is considered an appropriate use for the subject lands, is compatible with the existing surrounding uses and is not anticipated to generate incompatibility.

11.0 CONCLUSION

The purpose of this report is to demonstrate that an application proposing an Official Plan Amendment and Zoning By-law Amendment to facilitate and mixed-use development is consistent with the PPS policies, and conforms to the policies of the London Plan.

The proposed Official Plan Amendment to permit a building height up to 18-storeys, and a minor adjustment of the “*Urban Corridor*” Place Type is appropriate in this instance, as the addition of residential uses in the form of apartment dwellings will provide a necessary and desired form of housing in a location that is close to areas of employment and daily shopping needs.

The proposed site-specific zone regulations provide appropriate development standards to regulate the form of residential intensification and commercial development. Adverse impacts are not anticipated on adjacent industrial, institutional, and commercial land uses; and existing residential uses are adequately separated from the subject lands.

The proposed amendments are consistent with the PPS that encourages a range and mix of land uses to support development redevelopment, and intensification in settlement areas.

The subject lands are well located to support additional height and density, and the proposed site design is responsive to abutting and adjacent land uses. The built form of the proposed development is appropriate for the subject lands and is compatible with existing and planned uses abutting the lands. The proposed mixed-use building will enhance the pedestrian realm and visual appearance of the area.

The proposed residential units will increase housing choice in the area and will assist in meeting the needs of the current housing market. Notably, this proposal can make efficient use of underutilized lands to help address the significant housing shortage being experienced in the City of London.

Based on the above, and as detailed throughout this Planning and Design Report, the proposed Official Plan Amendment and Zoning By-Law Amendment is consistent with the 2024 Provincial Planning Statement and the purpose and intent of The London Plan. All supporting documentation (technical submission materials) support the development as proposed. The proposed development is appropriate and desirable for the subject lands, and represents sound land use planning principles.