
PLANNING JUSTIFICATION REPORT

**IN SUPPORT OF
OFFICIAL PLAN AMENDMENT AND
ZONING BY-LAW AMENDMENT
APPLICATION**

**PREPARED FOR
Foundation Development Fund II LP**

**60-68 High Street
City of London**

June 2026
GSAI File: 1707-002

CONTENTS

1.0 INTRODUCTION	3
2.0 PROCESS & ENGAGEMENT	4
3.0 SITE & AREA CONTEXT	4
3.1 AREA CONTEXT	6
3.2 TRANSIT CONTEXT	8
4.0 PROPOSED DEVELOPMENT.....	10
4.1 PROPOSED ZONING BY-LAW AMENDMENT	12
4.2 PROPOSED OFFICIAL PLAN AMENDMENT	13
5.0 SUPPORTING STUDIES	13
5.1 URBAN DESIGN BRIEF	13
5.2 TREE PRESERVATION PLAN	13
5.3 TRANSPORTATION IMPACT ASSESSMENT	13
5.4 SERVICING FEASIBILITY STUDY	14
6.0 POLICY CONTEXT	14
6.1 PROVINCIAL PLANNING STATEMENT (2024)	14
6.2 LONDON PLAN (CITY OF LONDON OFFICIAL PLAN)	18
6.3 CITY OF LONDON ZONING BY-LAW Z.-1	33
7.0 SUMMARY & CONCLUSION	39

LIST OF FIGURES

- **Figure 1:** Aerial Context
- **Figure 2:** Surrounding Context
- **Figure 3:** Surrounding Transit
- **Figure 4:** London Plan (2016) - Map 1 – Place Types
- **Figure 5:** London Plan (2016) - Map 10 – Protected Major Transit Station Areas
- **Figure 6:** London Plan (2016) - Map 3 – Street Classifications
- **Figure 7:** London Plan (2016) - Map 4 – Active Mobility Network
- **Figure 8:** City of London Zoning By-law Z.-1

LIST OF APPENDICES

- **Appendix I:** Architectural Plans (Goodplace Design, May 2026)
- **Appendix II:** Proposed Zoning By-law Amendment
- **Appendix III:** Proposed Official Plan Amendment

LIST OF TABLES

- **Table 1** - Affordable Monthly Rents in the City of London
- **Table 2:** Proposed Development Statistics
- **Table 3:** Zoning By-law Review Table
- **Table 4:** Summary of Requested Exemptions and Rationale

Planning Justification Report
Foundation Capital Development Fund II LP
Zoning By-law Amendment & Official Plan Amendment
60-68 High Street, City of London

1.0 INTRODUCTION

Glen Schnarr & Associates Inc. (GSAI) has been retained by Foundation Development Fund II LP (the ‘Applicant’) to assist with planning approvals to implement redevelopment of the lands municipally known and legally described as per below:

- 60 High Street, *PT LT 25, CON Broken Front, As In 847049; London;*
- 62 High Street, *PT LT 25, CON Broken Front, Part 1 & 2, 33R5186; S/T & T/W 941958; London;*
- 64 High Street; *PT LT 25, CON Broken Front, PT LT 1, PL 33(4TH), Part 2 & 3, 33R2852, S/T & T/W 729535, T/W Easement Over PT 2 PL 33R-16001 As In ER341297, London; and,*
- 68 High Street; *PT LT 1, PL 33(4TH), As In 927220; London.*

The above lands are collectively referred to as the ‘Subject Lands’ or ‘Site’ and are located east of High Street, west of Wellington Road, and south of Grand Avenue, in the City of London. The Subject Lands are approximately 0.18 hectares (0.45 acres) in total area and currently occupied by three single detached structures. The surrounding area is highly serviced by active transportation and public transit infrastructure, including new investment in rapid transit by the City of London. Section 3.0 of this Planning Justification Report (the ‘Report’) outlines the area context and surrounding land uses.

This Report has been prepared on behalf of the Applicant in support of a Zoning By-law Amendment and an Official Plan Amendment (the ‘Amendments’) application to facilitate redevelopment of the Subject Lands. The redevelopment will consist of a high density affordable apartment building fronting High Street (the ‘Proposed Development’). The Proposed Development is planned to provide affordable housing units targeted towards lower income residents in an efficient and functional apartment design. Section 4.0 below outlines the Proposed Development in detail, including the proposed implementing Amendments.

This Report demonstrates that the Proposed Development and corresponding Amendments serve to implement Provincial and local policy directions that support affordable, compact, infill development in proximity to higher order transit services, amenities, and services. This Report represents an analysis of the Proposed Development in accordance with good planning principles and an evaluation of relevant policy is provided in Section 6.0 below.

2.0 PROCESS & ENGAGEMENT

The proposed strategy for consulting with the public with respect to the Proposed Development will follow the requirements of the *Planning Act*, as amended, for statutory meetings as well as the City of London's planning application process. One statutory Public Meeting is anticipated with nearby residents and Council members, with advance notice provided to residents per the requirements of the *Planning Act*. This will assist in better informing local stakeholders and manage the implementation of the planning and redevelopment of the Subject Lands.

We note that a Pre-Application Consultation meeting was held with the Applicant on May 28, 2026, to present a preliminary concept for the Subject Lands, receive City feedback, and determine submission requirements. These submission requirements have been prepared and are summarized in Section 5.0 below.

3.0 SITE & AREA CONTEXT

As demonstrated in **Figure 1** (Aerial Context) below, the Subject Lands are located on the east side of High Street, west of Wellington Road, and south of Grand Avenue within Ward 11 in the City of London. The Subject Lands consists of four assembled parcels with 0.18 hectares (0.45 acres) in total area, resulting in varying lot depths. The Subject Lands currently consist of three single detached structures. Approximately 48 metres (157 feet) of frontage is provided along High Street, including three existing driveway accesses.

The Subject Lands abut a parcel assembly to the east (57-75 Wellington Road) and existing development application that is being reviewed by the City of London. The pre-consultation meeting regarding the Subject Lands occurred on May 28, 2026. The Subject Lands are under the same management as the abutting parcels and are intended to be developed concurrently with the abutting development application. 68 High Street is included in both applications as part of the concurrent application and is intended to be partially developed through the Proposed Development, as well as facilitate a shared vehicle access for both developments. The concurrent development process is discussed further in Section 4.0 of this Report below.



FIGURE

1

AERIAL CONTEXT PLAN

CITY OF LONDON

LEGEND

Subject Lands

60-68 HIGH STREET
CITY OF LONDON
MIDDLESEX COUNTY



SCALE NTS
MAY 20, 2026

GSAI
Glen Schnarr & Associates Inc.

3.1 AREA CONTEXT

On an irregular block formed by the fork of High Street and Wellington Road, the Subject Lands abut a vacant commercial site to the north, a residential site to the south, and existing residential uses to the east. Further north and south are existing commercial uses (TD Bank, Pizza Hut, LCBO). Three residential properties immediately east and abutting the Subject Lands (57-75 Wellington Road) are currently under an active development application on behalf of the Applicant for a future high rise apartment development. West of High Street are existing residential uses, including single detached and 4-6 storey apartment dwellings, as well as commercial convenience uses at the Grand Avenue/High Street intersection. East of Wellington Road are existing residential uses and a recreational park. There is currently ongoing construction of the Wellington Road Rapid Transit Corridor to the east. The residential built form in the greater surrounding area is a mix of single detached and mid-rise apartments.

As demonstrated in **Figure 2** (Surrounding Context) and described below, the greater surrounding area is primarily residential, with a mix of commercial, institutional, recreational, and natural heritage uses. There are multiple walkable commercial destinations, institutional uses, and recreational spaces approximately within one kilometre of the Subject Lands.

- | | |
|--------------|---|
| NORTH | The lands immediately north along both sides of Grand Avenue are commercial uses. Approximately 200 metres north is the Thames River, which meanders east-west, and Clark's Bridge. On the south side of the bridge are generally residential uses and on the north side is a mix of uses including commercial, office, residential, and industrial. Wellington Road is fronted by business commercial uses to the north and central London, including the Downtown core, is just over one kilometre further north. |
| SOUTH | Lands to the south are primarily residential, with commercial uses fronting Wellington Road. There is a commercial and medical office cluster located approximately one kilometre south, as well as the Victoria Hospital. |
| EAST | A planned high rise apartment building and rapid transit corridor is immediately east. Further east are residential and recreational uses, including Watson Street Park and an extension of the Thames Valley Parkway trail. |
| WEST | Lands to the west are primarily residential, with accessible recreation areas and facilities, including Farquaharson Arena, Wortley YMCA, and an extension of the Thames Valley Parkway trail. |

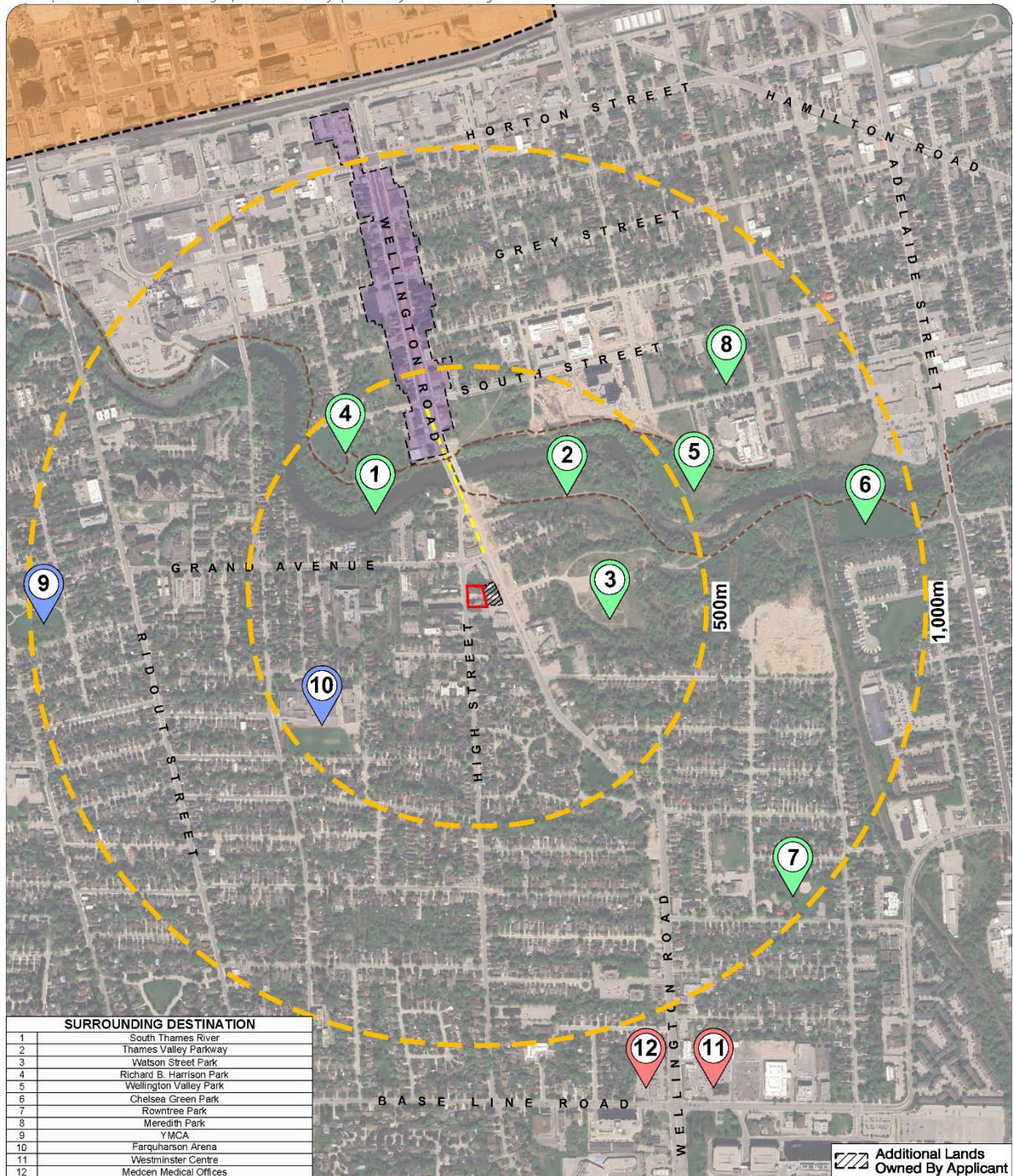


FIGURE
2

SURROUNDING CONTEXT PLAN

CITY OF LONDON

- Subject Lands
- Business District Commercial Area
- Downtown Area
- Buffer Limits (500m, 800m, 1,000m)
- Thames Valley Parkway Trail
- 2025-2027 Future Bike Infrastructure

60-68 HIGH STREET
CITY OF LONDON
MIDDLESEX COUNTY

- Parks & Open Spaces
- Institutional Uses
- Commercial Use



SCALE NTS
MAY 20, 2026

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 Additional Lands
Owned By Applicant

3.2 TRANSIT CONTEXT

LOCAL AND REGIONAL TRANSIT

As demonstrated in **Figure 3** (Transit Context Plan) below, the surrounding area is highly serviced by transit options. Existing London Transit routes 1, 3, 5, 6, 13, 15, 16, 90 are within a walking distance of approximately one kilometre and connected via pedestrian network, including pedestrian-only recreational trails. Route 6 operates along High Street in front of the Subject Lands and has stops accessible within 50 metres. Multiple existing routes offer frequent service along Wellington Road, including connection to Downtown London, and there are transit stops within 100 metres of the Subject Lands at Wellington Road/Grand Avenue. Greater connections are available in Downtown London, including the London Train Station, which provides significant regional connectivity. Residents are able to transfer to a variety of routes with connectivity throughout the City.

Wellington Road is further planned to be operated with bus rapid transit through the ‘Wellington Gateway Rapid Transit BRT’ project, which will provide enhanced capacity and service levels between Downtown London and Highway 401, as well as connection to the planned “Downtown Loop” and “East London Link” rapid transit projects. Two future rapid transit stations are planned within 400 metres of the Subject Lands to the north and south. Construction of the rapid transit project is ongoing with expected completion of the ‘Wellington Gateway’ project in 2028. The Subject Property is within the ‘Clark’s Bridge’ phase of the project, with construction in the immediate area expected to be complete in 2026. Upgrades will include enhanced street surfacing, streetscapes, and separated transportation modes, including bike lanes and dedicated bus-only transit lanes.

ROAD AND ACTIVE TRANSPORTATION NETWORK

The Subject Lands front High Street, identified as a Neighbourhood Connector. Wellington Road to the east is identified as a Rapid Transit Boulevard. Wellington Road is a major north-south connection in the City.

There are multiple existing active transportation routes in the area, including pedestrian infrastructure and dedicated bike lands on local streets. There is a dedicated bike lane providing north-south accessibility on Ridout Street West, approximately 700 metres west of the Subject Lands. The Thames Valley Parkway provides east-west accessibility approximately 300 metres north. With the City’s planned Wellington Road enhancements, future bike infrastructure is planned along the length of Wellington Road, including the reconstructed Clark’s Bridge to the north, which will provide direct bike connection from the Subject Lands towards Downtown London.

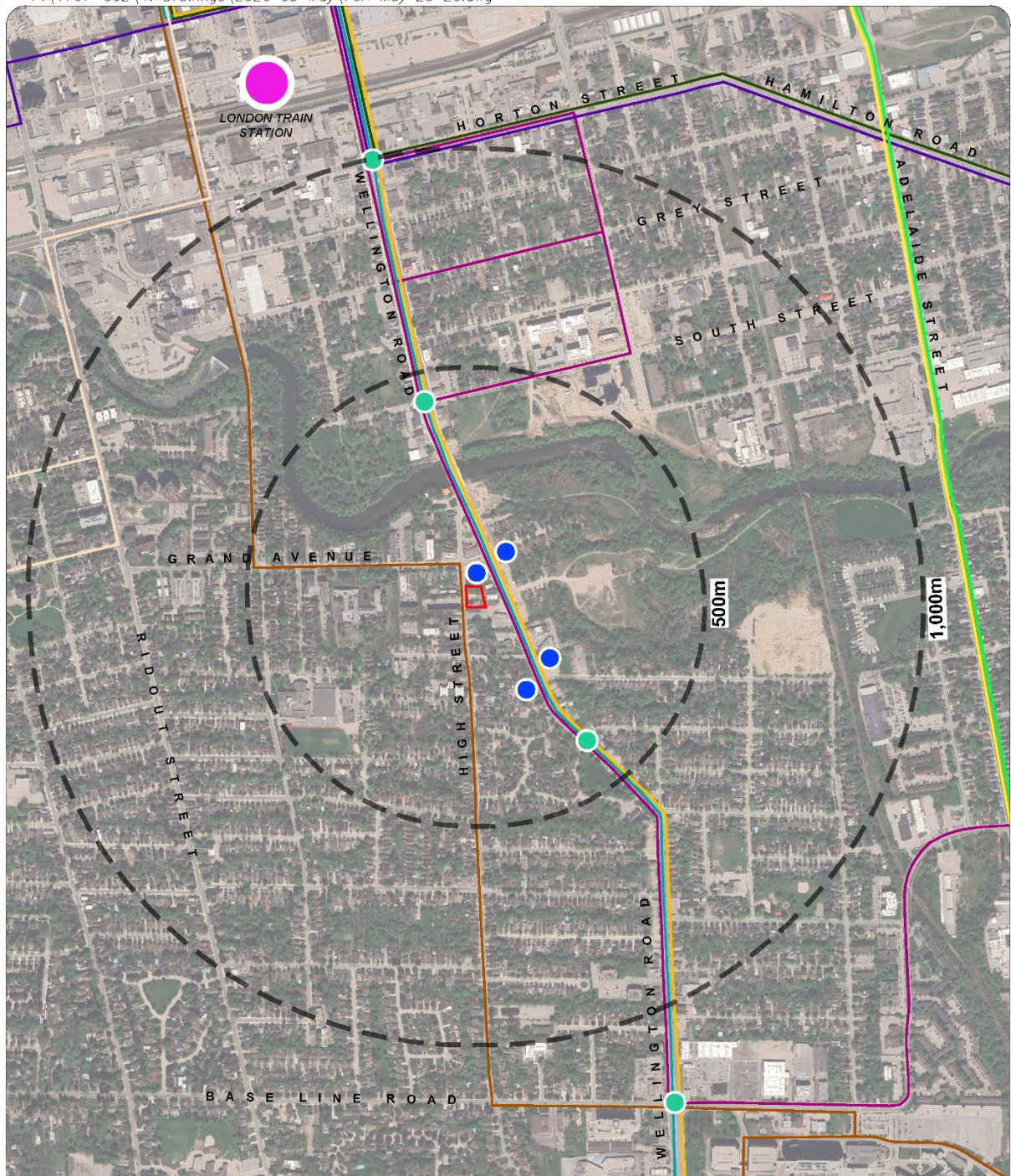


FIGURE
3

TRANSIT CONTEXT PLAN

CITY OF LONDON

- | | | | |
|---|--|---|--|
| Subject Lands | — LT Route 5 | — LT Route 15 | — LT Route 92 |
| — LT Route 1 | — LT Route 6 | — LT Route 16 | ● Future Rapid Transit Stations |
| — LT Route 3 | — LT Route 13 | — LT Route 90 | ● Existing Bus Stops |

60-68 HIGH STREET
CITY OF LONDON
MIDDLESEX COUNTY



SCALE NTS
MAY 20, 2026

GSAI
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4.0 PROPOSED DEVELOPMENT

The Proposed Development is a high density infill redevelopment consisting of a 25-storey (77.5 metres) purpose-built rental apartment. The apartment will be massed and oriented towards High Street, with primary pedestrian access at High Street. Vehicle access to one level of underground parking and a second access for loading and drop-off/pickup is proposed from High Street. The second access is planned to be shared with the abutting proposed residential development to the east (lands owned by the Applicant). Continuous pedestrian access is proposed at ground level between High Street and Wellington Road through the concurrent apartment developments proposed by the Applicant.

A total of 432 residential units are proposed, across studio, one-bedroom, and two-bedroom sizes. Refer to **Appendix I** (Architectural Plans) to review the Proposed Development site plan.

The intent of the Proposed Development is to provide affordable rental units, including a minimum of 10% of the units at deeply affordable rents (80% of average market rent). The remaining units are intended to be rented at or near the affordable monthly rent of the City of London per unit type.

The Province defines rental affordability as the least expensive of: “a unit for which the rent does not exceed 30 percent of gross annual household income for low and moderate income households; or a unit for which the rent is at or below the average market rent of a unit in the municipality” (Provincial Planning Statement). The Province publishes an annual bulletin of affordable residential units and average market rents for Ontario municipalities, most recently in August 2025 (“August 2025 Bulletin of the Affordable Residential Units for the Purposes of the Development Charges Act, 1997”). Per the Provincial bulletin, affordable monthly rents and average market rents for the City of London are identified in **Table 1** below. For additional comparison, 2025 average market rents as published by Canada Mortgage and Housing Corporation (CMHC) for the City are also identified in the fourth column of **Table 1**:

Table 1 - Affordable Monthly Rents in the City of London

UNIT TYPE	AFFORDABLE MONTHLY RENT (PROVINCIAL BULLETIN)	AVERAGE MARKET RENT (PROVINCIAL BULLETIN)	AVERAGE MARKET RENT (CMHC)
Bachelor (Studio)	\$1,035	\$1,035	\$1,066
One-bedroom	\$1,303	\$1,303	\$1,371
Two-bedroom	\$1,546	\$1,546	\$1,645
Three-bedroom	\$1,800	\$1,844	\$1,872

Per Table 1 above, deeply affordable rents (80% of average monthly rent) would be approximately \$828 for a Bachelor (Studio) unit, \$1,042 for a One-bedroom unit, and \$1,236 for a Two-bedroom unit.

The apartment building is 25-storeys, excluding mechanical penthouse, with each storey generally 3 metres. The first floor will be slightly larger at 4.2 metres to provide articulation and emphasize the entrance along High Street. The seventh floor will be 3.8 metres and there will be a shift in material tone between the first seven floors and the upper floors to support human-scale design and frame the streetscape. Each residential floor consists of 18 residential units, including 13 studio, 3 one-bedroom, and 2 two-bedroom. The apartment building is planned to be constructed as a pre-cast concrete building with energy efficient features. This practical design facilitates a functional and affordable development that facilitates the provision of much-needed affordable units.

The proposed apartment building includes approximately 257 square metres of indoor amenity space and 434 square metres of outdoor amenity space on the ground floor and rooftop, for a total of approximately 691 square metres of amenity space (1.6 square metres per residential unit). These community spaces are supplemented by multiple public open space and recreation uses within close walking distance, including Watson Street Park and the Thames Valley Parkway.

There is no minimum parking requirement for the Subject Lands per the City of London Zoning By-law and no personal vehicle parking spaces are provided. Nine visitor parking spaces (including one accessible space) are provided on one level of underground parking. 232 total bicycle parking spaces are provided, including 120 short term spaces at ground level and 112 long term spaces on the underground parking level. Of the 120 short-term spaces, 50 will be covered and weather-protected by building overhang on the south side.

The ground floor provides direct pedestrian access to High Street, and pedestrian access is also available to Wellington Road via walkways around the abutting planned development. Residents will have access to the future enhanced Wellington Road streetscape, including existing public transit stops within 100 metres, and future rapid transit public stations within 450 metres. Pedestrian walkways are proposed along the north and south sides of the Proposed Development, facilitating continuous pedestrian movement between Wellington Road and High Street, as well as through the ground floor of the building through front and rear accesses.

Overall, the Proposed Development is a functionally designed residential apartment building along an evolving rapid transit corridor that provides affordable housing in an area well-served by municipal infrastructure and community amenities. General development statistics are outlined in **Table 2** below.

Table 2 – Proposed Development Statistics

DEVELOPMENT CHARACTERISTIC	DESCRIPTION
Total Site Area	1,823 m ² (0.18 ha; 0.45 ac)
Building Footprint	841 m ² (9,057 ft ²)
Gross Floor Area	19,283 m ² (207,568 ft ²)
Floor Space Index	10.58
Total Units	432
Unit Mix	312 Studio; 72 One-bedroom; 48 Two-bedroom
Density (UPH)	2,368
Height	25 Storeys (77.5 m) excluding mechanical penthouse
Visitor Parking	9 Spaces (including 1 accessible)
Short-Term Bicycle Parking	120 Spaces (0.28 per unit)
Long-Term Bicycle Parking	112 Spaces (0.26 per unit)
Loading Spaces	2
Amenity Space	691 m ² (7,438 ft ²) (1.6 m ² per unit)

To permit the Proposed Development, a Zoning By-law Amendment and Official Plan Amendment are required. The proposed implementing Amendments are detailed below.

4.1 PROPOSED ZONING BY-LAW AMENDMENT

The Subject Lands are subject to the City of London Zoning By-law Z.-1 and are currently compound zoned “Holding Residential R3/Transit Station Area (R3-2/h-13/TSA1)”. To facilitate the Proposed Development, a Zoning By-law Amendment (‘ZBA’) is required.

The proposed ZBA seeks to rezone the Subject Lands with site-specific TSA1 permissions to implement site-specific building standards. Specifically, the ZBA seeks to introduce the following:

- Permit a north interior yard depth of 1.6 metres
- Permit a south interior yard depth of 8.1 metres
- Permit a floor area ratio of 10.58
- Permit an amenity area rate of 1.6 m² per residential unit
- Remove step back provision
- Remove the maximum number of units per lot provision
- Permit a long-term bicycle parking space rate of 0.26 spaces per residential unit
- Permit no electric vehicle charging stations

A summary of the in-effect and requested zone provisions is provided below in Section 6.3 of this Report, including Zoning By-law table and rationale. The proposed ZBA is provided in **Appendix II**.

4.2 PROPOSED OFFICIAL PLAN AMENDMENT

The Subject Lands are subject to the City of London Official Plan and designated as a ‘Rapid Transit Corridor’ Place Type. To facilitate the Proposed Development, an Official Plan Amendment (‘OPA’) is required.

The proposed OPA seeks to permit the building height of 25 storeys (77.5 metres) and additional height required by the mechanical penthouse. The proposed OPA is provided in **Appendix III**.

5.0 SUPPORTING STUDIES

5.1 URBAN DESIGN BRIEF

An Urban Design Brief (UDB) was prepared in support of the Proposed Development (Scorgie Planning, June 2026). The UDB describes the context of the Proposed Development relationship to the surrounding area and provides an analysis of applicable design policies and guidelines of the London Plan. Per the UDB, the design of the Proposed Development responds to the following principles: Mixed-income and affordable housing delivery; Efficiency through standardized and modular construction; compact built form supporting housing delivery; Structured and legible architectural expression; Essential residential performance; Accessible and seniors-oriented housing; Transit-supportive, car-limited development; Coordinated two-building organization and managed interface; Landscape as a supporting public realm element; Deliverability and replicability.

5.2 TREE PRESERVATION PLAN

A Tree Preservation Plan (TPP) was prepared in support of the Proposed Development (Dan Weagant, May 2026). Per the TPP, 32 trees are identified on the Subject Lands and 29 trees (including 2 dead) are required to be removed to facilitate the Proposed Development. Where warranted and advisable, efforts are made to preserve and protect trees in situ. Note that trees #1-22 are also identified in a TPP prepared for the adjacent active development application on behalf of the Applicant. These removals will facilitate a comprehensive redevelopment.

5.3 TRANSPORTATION IMPACT ASSESSMENT

A Transportation Impact Assessment (TIA) was prepared in support of the Proposed Development (MDT Urban Traffic Solutions Ltd., June 2026). Per the TIA, study area intersections are operating with satisfactory levels of service under existing conditions. Future background and total conditions are forecast to operate with similar level of service as existing conditions and no adverse traffic

impacts are noted. The TIA assumes a horizon year of 2035 for future conditions, when the Wellington Gateway Project will be complete and operational. Study area intersections included Grand Avenue/Wellington Road, Grand Avenue/High Street, and the site driveway connection to High Street.

Regarding site access, the TIA observes that internal circulation within the site for emergency, waste, and passenger vehicles is feasible as demonstrated through a swept path assessment. The circular internal driveway configuration, accessed from High Street, provides flexibility for continuous vehicle movement and temporary staging internal to the site without reliance on the public roadway.

We note that the TIA provides an analysis of the Proposed Development at the current planning stage, and additional refinement is anticipated at the future Site Plan Approval stage.

5.4 SERVICING FEASIBILITY STUDY

A Servicing Feasibility Study (SFS) was prepared in support of the Proposed Development (Strik, Baldinelli, Moniz Ltd., June 2026). The SFS identifies that existing municipal services are adequate to service the Proposed Development.

There are existing sanitary, water, and stormwater servicing connections in High Street, adjacent to the Subject Lands. The Servicing Feasibility Study proposes that these existing services have capacity and can service the Proposed Development, with future evaluation anticipated at the Site Plan Approval Stage. Stormwater management controls will also be implemented in future planning stages to ensure no adverse stormwater management-related impacts from the post-development condition.

6.0 POLICY CONTEXT

The following sections demonstrate that the Proposed Development continues to be consistent with or conform to the policies of the Provincial Planning Statement (2024), the City of London Official Plan, and the City of Vaughan Zoning By-law Z.-1.

6.1 PROVINCIAL PLANNING STATEMENT (2024)

The Provincial Planning Statement (‘PPS’) came into force and effect on October 20, 2024. The PPS replaced both the Provincial Policy Statement, 2020, and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019, building upon housing-supportive policies from both documents. All planning decisions are to be consistent with the policy statements issued under the *Planning Act*, including the PPS.

The PPS provides policy direction on matters of provincial interest related to land use planning and development. It acknowledges that Municipal Official Plans are the most important vehicle for implementing the PPS and for achieving comprehensive, integrated, and long-term planning. The

PPS is to be read in its entirety and in conjunction with other Provincial plans. The PPS does not take precedence over other Provincial plans in the instance of a conflict.

Chapter 2 of the PPS provides policy direction related to “*Building Homes, Sustaining Strong and Competitive Communities*” and is applicable to the Subject Lands. It generally encourages an appropriate range and mix of housing options to meet Provincial growth forecasts, as well as the achievement of complete communities.

“Complete communities” are defined in the PPS as: “*places such as mixed-use neighbourhoods or other areas within cities, towns, and settlement areas that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, public service facilities, local stores and services. Complete communities are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations.*”

HOUSING

Section 2.2 states: “*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:*

- a) *establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income 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;*

The City of London Official Plan identifies a target of 25% of new housing to be affordable to low- and moderate-income households. The Proposed Development intends to provide 10% deeply affordable units, with the remainder rented at or near the affordable monthly rent of the City of London per unit type. Affordable monthly rents are identified in **Table 1** of this report and range between \$1,035 (studio/bachelor) to \$1,546 (two-bedroom) per unit type. Deeply affordable rents (80% of average market rent) range between \$828 (studio/bachelor) and \$1,236 (two-bedroom). These rents would represent approximately 30% of before-tax income for households making up to and around \$60,000. The 432 units within the Proposed Development will contribute towards the City of London’s 25% target of new affordable housing.

- b) *permitting and facilitating:*

1. *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*
2. *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;

The Proposed Development provides for a mix of unit types in a high density, affordable rental apartment. This proposal will add to the housing mix in the surrounding area, which generally consists of existing single detached and mid-rise apartment buildings. The mix of unit sizes will accommodate a range of household types and income levels, including low- to moderate-income households, young adults, and seniors. The Proposed Development also represents residential intensification on an underutilized site, creating a net increase in units. The Proposed Development supports complete communities through the provision of a range of housing options, including affordable housing.

c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and

d) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.”

The Proposed Development utilizes existing infrastructure, including municipal servicing and transportation infrastructure highly accessible to the Subject Lands. The Proposed Development will be built at a supportive density to optimize investment in this infrastructure and area facilities. City-facilitated road enhancements are ongoing on Wellington Road to implement rapid public transit, bike lanes, and improved pedestrian sidewalks. Wellington Road is planned as a rapid transit corridor and rapid transit stations are planned north and south of the Subject Lands within 400 metres. The Proposed Development is oriented towards public transit and active transportation, with no resident parking and reduced visitor parking rates. This is supportable given the high accessibility of public transit in the area.

The residential density of the Proposed Development is 2,368 units per net hectare. There is no maximum density in the City of London Official Plan or Zoning By-law for the Subject Lands, and this density meets the intent of the Official Plan for high density redevelopment along a rapid transit corridor. The proposed density is transit-supportive and supports existing and future investment in public and active transportation in the community.

SETTLEMENT AREAS AND STRATEGIC GROWTH AREAS

Per Section 2.3.1.1 of the PPS, growth and development should be focused in Settlement Areas and further focused within Strategic Growth Areas and Major Transit Station Areas (MTSA). The PPS defines ‘*Strategic Growth Areas*’ as lands “*within settlement areas, nodes, corridors, and other areas that have been identified by municipalities to be the focus for accommodating intensification and higher density mixed uses in a more compact built form*”.

The Subject Lands are in a Settlement Area and Strategic Growth Area, as designated by the City of London in the Rapid Transit Corridor Place Type and an MTSA. The PPS plans for the greatest

amount of growth to achieve transit-supportive densities within MTSA's. As such, the Subject Lands are suitable for intensification and higher density development in a compact built form.

Section 2.3.1.2 states: "*Land use patterns within settlement areas should be based on densities and a mix of land uses which:*

- a) efficiently use land and resources;*
- b) optimize existing and planned infrastructure and public service facilities;*
- c) support active transportation;*
- d) are transit-supportive, as appropriate; and*
- e) are freight-supportive"*

The Proposed Development represents a high density residential development along a rapid transit corridor and supports the City's expansion and investment in the corridor. The Proposed Development is a compact development that minimizes land consumption while utilizing existing municipal infrastructure, active transportation networks, and public/private services, including active parks, centres, and retail/commercial uses. The Proposed Development is an appropriate land use and density within the planned context of the City structure.

Section 2.3.1.3 of the PPS encourages redevelopment that supports complete communities – including a range and mix of housing options and investment in necessary infrastructure. As discussed, the Proposed Development provides a range of new housing options to the surrounding area, including affordable, purpose-built rental units.

Section 2.4.1.2 of the PPS states that to support a range and mix of housing options and intensification, Strategic Growth Areas should be planned "*to accommodate significant population and employment growth*" and "*to support affordable, accessible, and equitable housing.*" The Proposed Development represents an intensified residential development that provides affordable housing options, which is appropriate within a Strategic Growth Area.

Section 2.4.2.1 states that municipalities should plan for a minimum density target of 160 residents and jobs combined in an MTSA served by bus rapid transit. The Proposed Development is planned for 432 units or an approximate population of 620, per the density assumptions within the City of London "2021 Development Charges Background Study".¹ This proposed population contributes to the minimum density target of the PPS within an MTSA.

ENERGY CONSERVATION, AIR QUALITY, AND CLIMATE CHANGE

Section 2.9 of the PPS outlines policy regarding greenhouse gas emissions and climate change. The Proposed Development is consistent with this policy as it represents a high residential and compact built form that more efficiently utilizes existing municipal services, including water and energy.

¹ High Density Apartment 1-bedroom: **1.38** persons per unit; High Density Apartment 2-bedroom: **1.87** persons per unit

Additionally, the Proposed Development promotes usage of existing and planned public transit and active transportation networks in the surrounding area as an alternative to personal automobiles.

SEWAGE, WATER, AND STORMWATER

Policy requirements under Section 3.6 of the PPS are addressed through the Servicing Feasibility Study (Strik, Baldinelli, Moniz Ltd., June 2026), which identifies that the Proposed Development can be serviced by existing municipal sanitary, water, and stormwater infrastructure services adjacent to the Subject Lands on High Street. These existing services have capacity to service the Proposed Development and future evaluation is anticipated at the Site Plan Approval stage. Stormwater management controls will also be implemented in future planning stages to ensure no adverse stormwater management-related impacts from the post-development condition.

SUMMARY / CONSISTENCY STATEMENT

The PPS outlines a series of guiding policies meant to direct land use planning and development across Ontario. As such, the PPS focuses on ensuring growth and development is directed to appropriate locations, with an emphasis on development occurring in areas well-served by transit and infrastructure while not adversely affecting protection of the natural environment.

The above analysis demonstrates that the proposed development conforms to the PPS by facilitating development, at an appropriate location, that will make better use of existing land, resources and infrastructure. It will also support 432 affordable housing units and intensification along an identified rapid transit route. It is our opinion that the Proposed Development and corresponding Amendments are consistent with the policies of the PPS.

6.2 LONDON PLAN (CITY OF LONDON OFFICIAL PLAN)

The London Plan constitutes the City of London Official Plan ('Official Plan'), which was adopted by Council in June 2016 and approved by the Minister of Municipal Affairs and Housing (MMAH) in December 2016. As of May 2022, the Official Plan is in full force and effect as all policy appeals have been resolved through Ontario Land Tribunal (OLT). The Official Plan is a land use planning document that provides policy for growth and development in the City. Per the Official Plan, London's population is expected to grow by over 77,000 people and 41,000 housing units between 2015 and 2035, to a total population of 458,000 in 2035.

The Official Plan organizes land use through 'Place Type' policies, as illustrated in **Figure 4** (Place Types) below. The Subject Lands are designated within a 'Rapid Transit Corridor' Place Type. The Rapid Transit Corridor permits a range of uses, including residential, retail, service, office, cultural, recreational, and institutional. General built form is permitted between 2-25 storeys for residential and mixed use development. Further, per **Figure 5** (Protected Major Transit Station Areas) below, the Subject Lands are within a 'Rapid Transit Protected Major Transit Station Area' (Rapid Transit PMTSA). Rapid Transit PMTSAs are identified due to their proximity to rapid transit stations.



FIGURE 4

LONDON OFFICIAL PLAN

MAP 1 - PLACE TYPES

LEGEND

Subject Lands

60-68 HIGH STREET
CITY OF LONDON
MIDDLESEX COUNTY



SCALE NTS
MAY 20, 2026

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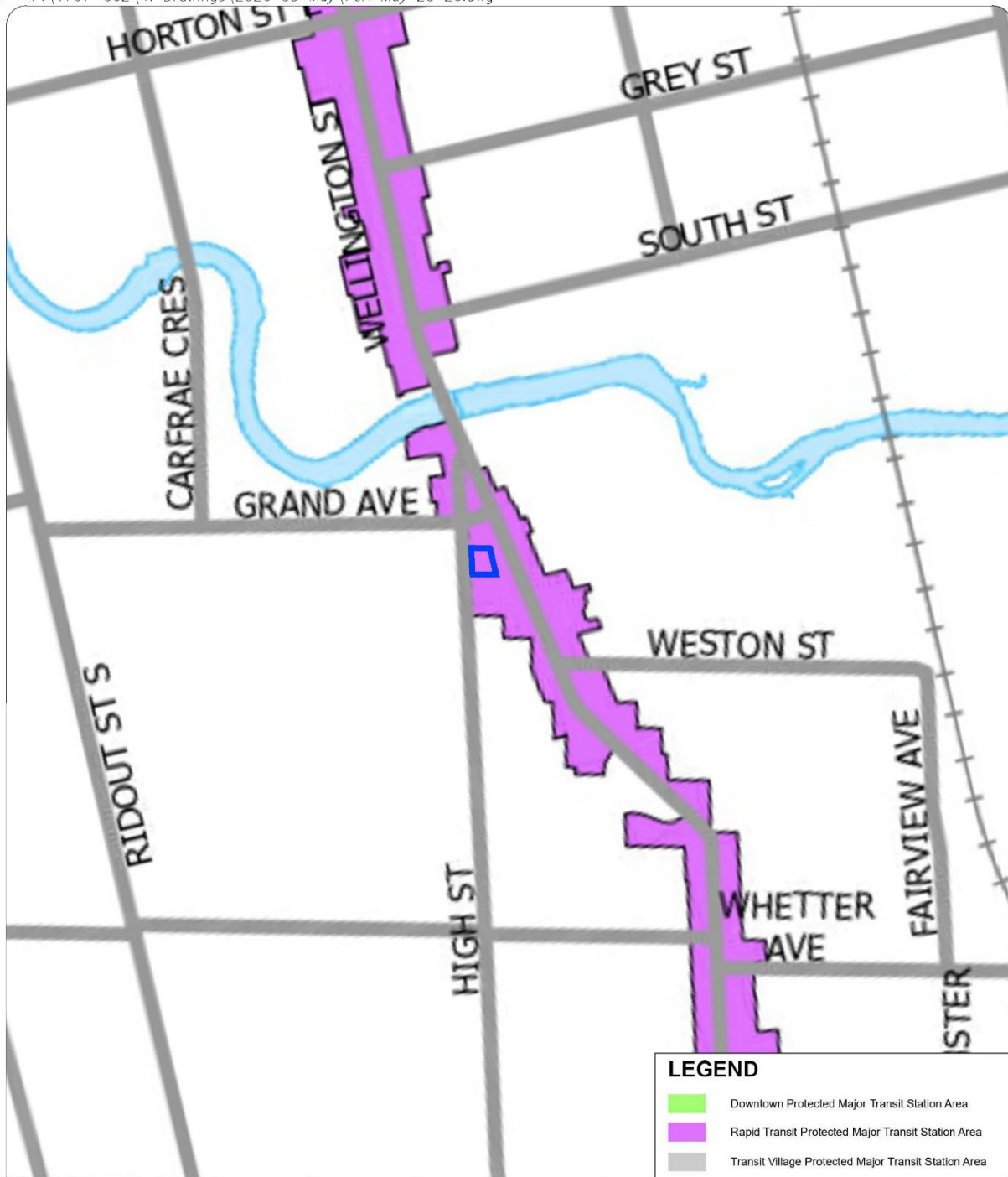


FIGURE
5

LONDON OFFICIAL PLAN

MAP 10 - PROJECTED MAJOR TRANSIT STATION AREAS

LEGEND

Subject Lands

60-68 HIGH STREET
CITY OF LONDON
MIDDLESEX COUNTY



SCALE NTS
MAY 20, 2026

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The ‘Our Challenge’ chapter of the Official Plan identifies the context and challenges for City growth. Per policy 7_, a compact form of growth is encouraged for efficient infrastructure costs, reduction of energy consumption and emissions, and options for mobility, when compared to a highly spread out form of growth. Policy 11_ and 12_ emphasize the growth and interest in automobile alternatives, including public transit and rapid transit, where transit ridership in London grew 84% between 1996 to 2011², and an estimated 115,000 people will live and 84,000 people will work within a 10 minute walk of proposed rapid transit lines³. Policy 16_ states that the City is experiencing housing affordability challenges and a pressing need to develop affordable housing.

The Official Plan conforms to the PPS definition of affordable housing, which for rental housing is defined as the least expensive of: *“a unit for which the rent does not exceed 30 percent of gross annual household income for low and moderate income households; or a unit for which the rent is at or below the average market rent of a unit in the municipality”* (Provincial Planning Statement). Affordable rents and average market rents for the City of London are detailed in **Table 1** of this Report.

VALUES, VISION, AND KEY DIRECTIONS

The ‘Our Strategy’ chapter of the Official Plan establishes the values, vision, and key directions of the Official Plan. Within this chapter there is an emphasis on affordable housing, a mix of housing options, alternative transportation, and strategic intensification along rapid transit corridors. Noted directions and policy include the following:

- Direction #1 (*“Plan strategically for a prosperous city”*):
 - 55_13: *“Invest in, and promote, affordable housing to revitalize neighbourhoods and ensure housing for all Londoners.”*
- Direction #5 (*“Build a mixed-use compact city”*):
 - 59_1: *“Implement a city structure plan that focuses high-intensity, mixed-use development to strategic locations - along rapid transit corridors and within the Primary Transit Area.”*
 - 59_4: *“Plan for infill and intensification of various types and forms to take advantage of existing services and facilities and to reduce our need to grow outward.”*
 - 59_5: *“Ensure a mix of housing types within our neighbourhoods so that they are complete and support aging in place.”*
- Direction #6 (*“Place a new emphasis on creating attractive mobility choices”*):
 - 60_1: *“Create active mobility choices such as walking, cycling, and transit to support safe, affordable, and healthy communities.”*

² Official Plan, page 6 (“Did You Know”)

³ Official Plan, page 7 (“Did You Know”)

- 60_3: *“Establish a high-quality rapid transit system in London and strategically use it to create an incentive for development along rapid transit corridors and at transit villages and stations”*
- 60_6: *“Dependent upon context, require, promote, and encourage transit-oriented development forms.”*
- Direction #7 (*“Build strong, healthy and attractive neighbourhoods for everyone”*):
 - 61_2: *“Design complete neighbourhoods by meeting the needs of people of all ages, incomes and abilities, allowing for aging in place and accessibility to amenities, facilities and services.”*
 - 61_10: *“Integrate affordable forms of housing in all neighbourhoods and explore creative opportunities for rehabilitating our public housing resources.”*

GROWTH MANAGEMENT AND INTENSIFICATION

The “Our City” chapter of the Official Plan outlines the planned City structure, including major physical elements and growth management policies. The Subject Lands are identified within the “Urban Growth Boundary” and the “Built Area Boundary” of the Official Plan, which is the focus area for growth within the City structure.

Intensification within the Urban Growth Boundary and existing built-up area is encouraged in the Official Plan, which emphasizes developing *“inward and upward”* (policy 79_). Intensification is defined in multiple forms, including *“Infill development of vacant and underutilized lots”* and *“Redevelopment, at a higher than existing density, on developed lands”* (policy 80_). The Proposed Development represents this form of residential intensification as the site is currently underutilized along an evolving corridor planned for rapid transit infrastructure.

The City’s growth is generally planned around the development of Rapid Transit Corridors and a ‘Primary Transit Area’. The Subject Lands are located within the Primary Transit Area, and as noted, are designated within the Rapid Transit Corridor Place Type. The Primary Transit Area is planned to receive the greatest amount of transit infrastructure investment and the highest level of transit service (policy 92_2). The Primary Transit Area is also a focus of intensification, where 75% of the intensification target will be directed to the Primary Transit Area (policy 92_3). Development in the Primary Transit Corridor should be transit-oriented and well-served by active transportation and public spaces for recreation (policy 92_8). Further, Rapid Transit Corridors are intended to be developed with an intensity to support rapid transit ridership (policy 96_).

The Proposed Development meets the policy direction for intensification within these areas, providing 432 units in a high-rise apartment building adjacent to the Wellington Road rapid transit corridor. The Proposed Development will formally front High Street but can be accessed in the rear via Wellington Road and through the walkways of the adjacent proposed development (lands owned by the Applicant). The Proposed Development will utilize the existing municipal investment in active

transportation and public transit to facilitate resident mobility. As the Proposed Development does not oversupply parking, it is able to facilitate a more functional design and more affordable units.

The surrounding area is well-served by active transportation and public transit, including pedestrian sidewalks and amenities, bike lanes, bus routes, and a planned rapid transit route. Existing bus stops are located on High Street, Grand Avenue, and Wellington Road – all within 100 metres of the Subject Lands. Future rapid transit stations will be located within 450 metres to the north and south.

Additional elements of the City structure are the mobility framework, green framework, the economic framework, and community framework, which are discussed in further detail below. The mobility framework includes elements such as Rapid Transit Corridors, regional rail connectivity, and the Thames Valley Trail. The green framework includes elements such as parkland and the Thames Valley Corridor. The economic framework includes strategic growth areas.

CITY DESIGN

The Official Plan outlines policy regarding city design, including built form direction for streets, streetscapes, and buildings. Policy 193_ states objectives for city building policies, which include compatible built forms, positive pedestrian environments, and a mix of housing types to support ageing in place and affordability.

An Urban Design Brief has been prepared in support of the Proposed Development (Scorgie Planning, June 2026) and provides a discussion of the planning and urban design framework as outlined in the city design section of the Official Plan (policies 189_ to 306_). That Urban Design Brief is provided separately from this Report. From a land use planning perspective, the Proposed Development addresses the planned vision of the Rapid Transit Corridor Place Type by providing a high-density built form in an area defined in part by high accessibility to public transit and community amenities. Discussion on the proposed site configuration and amendments to the Zoning By-law are discussed further in Section 6.3 and Table 4 of this Report.

Policy 259_ states: *“Buildings should be sited with minimal setbacks from public streets and public spaces to create an inviting, active and comfortable pedestrian environment.”* The Proposed Development has a front yard setback of 1.5 metres, within the permitted range of the City of London Zoning By-law, and appropriate for the built form and the High Street frontage.

Policy 266_ states: *“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.”* Loading and garbage service access is proposed to the rear of the Proposed Development with access from High Street. Resident drop-off/pickup area is also proposed to the rear and screened from High Street.

Policy 268_ states: *“Sites shall be designed to provide a direct, comfortable and safe connection from the principle building entrance to the public sidewalk”.* The proposed apartment building is massed and oriented towards High Street, with principal building entrance to the sidewalk. Principle entrance is provided to High Street, however it is anticipated that residents may also use the rear entrance

accessed via pedestrian walkways to Wellington Road through the adjacent proposed development (lands owned by the Applicant). The Proposed Development and adjacent proposed development will be developed comprehensively in this respect to ensure direct and safe connection to and between High Street and Wellington Road. Ground floor amenity area is provided for residents, which may offer passive surveillance and active the street level.

Regarding parking, policy 271_ states: *“The Zoning By-law will establish automobile parking standards, ensuring that excessive amounts of parking are not required. Requirements may be lower or may not apply within those place types and parts of the city that have high accessibility to transit or that are close to employment areas, office areas, institutions and other uses that generate high levels of attraction.”* The Zoning By-law does not require minimum parking standards within the Rapid Transit Corridor Place Type of the Official Plan. As such, no personal vehicle parking spaces are proposed. A resident and visitor drop-off/pickup area is provided at the rear of the proposed apartment building, and nine visitor parking spaces are provided to facilitate vehicle access. The visitor spaces are provided in one level of underground parking to reduce the visual impact of surface parking and make more efficient use of land. As discussed in this Report, the Subject Lands are highly serviced by existing and planned transit and active transportation, providing multiple mobility options for residents beyond personal vehicles. Additionally, removing the requirement for personal vehicle parking reduces expenses for both construction and residents, which facilitates more affordable units for City residents.

Policy 280_ states: *“Adequate bicycle parking facilities will be required for all development to encourage cycling as a viable form of transportation. Covered and secure forms of bicycle parking should be incorporated into multi-unit residential, large-scale commercial or retail, institutional, and recreational developments.”* The Proposed Development provides 120 short-term bicycle parking spaces outside at the ground level, and 112 long-term bicycle parking spaces in one level of underground. The short-term bicycle spaces are located at the north, east, and south sides of the building. Of the short-term bicycle spaces, 50 will be covered and weather protected under the south building overhang at ground level – resulting in 157 covered bicycle parking spaces.

Bicycle parking rates of 0.28 long-term spaces and 0.26 short-term spaces per residential unit are proposed. An amendment is required to facilitate the 0.28 long-term rate, however these rates are adequate to support the Proposed Development. Given the high public transit accessibility in the surrounding area, including rapid transit and options for regional connectivity, the primary form of transportation for future residents is anticipated to be public transit.

The “Buildings” policies (284_ to 305_) are addressed in greatest detail through the supporting Urban Design Brief (Scorgie Planning, June 2026), submitted separately to this Report. However, again from a land use perspective, the proposed 25-storey apartment built form is appropriate for the planned area and City structure, where the Official Plan directs higher densities and intensification along Rapid Transit Corridors and within an MTSA. Minimal impacts to adjacent properties are

anticipated as the north and south abutting properties are a mix of vacant, commercial, and residential uses, and three of the east abutting residential properties are managed and planned by the Applicant.

Transition to surrounding properties is provided through relative massing and orientation of the building along High Street, with adequate setbacks to adjacent sites. The building height is mitigated to the west via the approximately 20 metre existing width of High Street, and to the south via the 8.1 metre interior side yard setback. Minimal impact to the north is anticipated as the adjacent sites are vacant and/or commercial. Minimal impact to the east is anticipated as the Proposed Development is planned to be developed comprehensively with those lands, including a shared outdoor resident seating area, short-term bicycle parking, vehicle access, drop-off/pickup, and pedestrian walkway. The rear yard setback to the abutting east site is compatible as it is a minimum of 9.9 metres at pinch point due to lot configuration.

MOBILITY AND PLANNED STREET WIDTHS

The Official Plan outlines policy regarding mobility, including the design of mobility infrastructure and supportive development. Policy 313_ states objectives for mobility policies, which include utilizing rapid transit to promote intensification, prioritizing active transportation, and planning for development complementary to active transportation and public transit. A long-term goal of the Official Plan is to connect London to a high speed rail network with regional connections (policy 314_). As noted, the Proposed Development is just over one kilometre from the London Train Station and highly accessible via transit.

As illustrated in **Figure 6** below (Street Classifications), the Subject Lands are located on a Neighbourhood Connector (High Street) and adjacent to a Rapid Transit Boulevard (Wellington Road). And as illustrated on **Figure 7** below (Active Mobility Networks), the Subject Lands are near to cycling and walking routes, including the Thames Valley Corridor. As described in Section 3.2 of this Report and illustrated in **Figure 2** above, future cycling infrastructure is planned along the enhanced Wellington Road and connecting north across Clark's Bridge towards Downtown London.

Per policy 371_, Neighbourhood Connectors are prioritized for pedestrians and move low to medium volumes of cycle/transit/vehicles. Rapid Transit Boulevards prioritize through movement and move high volumes of traffic across multiple modes. As further identified in the "Complete Streets Design Manual", 23 metres and 50 metres are the "*preferred*" widths for Neighbourhood Connectors and Rapid Transit Corridors, respectively. The ultimate width of Wellington Road has been defined through the ongoing BRT project and is currently under construction.

As discussed in the TIA (MDT Urban Traffic Solutions Ltd., June 2026) detailed in Section 5.3 of this Report, no adverse impact is anticipated to the surrounding transportation network as the study area intersections are operating with acceptable levels of service under existing and future conditions. Future conditions assume the Wellington Gateway Project will be complete and operational. Per the TIA, the Proposed Development is supported by strong transit accessibility, active transportation infrastructure, and a transportation strategy focused on reduced reliance on private vehicles.





FIGURE
7

LONDON OFFICIAL PLAN
MAP 4 - ACTIVE MOBILITY NETWORK

LEGEND

Subject Lands

60-68 HIGH STREET
CITY OF LONDON
MIDDLESEX COUNTY



SCALE NTS
MAY 20, 2026

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CIVIC INFRASTRUCTURE

Official Plan policies 448_ to 491_ outline policy regarding civic infrastructure in the City, including water, wastewater, and stormwater management. Per the Official Plan, new development within the Urban Growth Boundary will be permitted only if it can be connected to adequate municipal sanitary sewage (policy 473_5) and water (policy 474_4) infrastructure. Per policy 475_, all development shall require stormwater servicing designed to appropriate criteria. A Servicing Feasibility Study was prepared in support of the Proposed Development (Strik, Baldinelli, Moniz Ltd., June 2026). The Servicing Feasibility Study identifies that the Proposed Development can be serviced by existing municipal sanitary, water, and stormwater infrastructure services adjacent to the Subject Lands on High Street. These existing services have capacity to service the Proposed Development and future evaluation is anticipated at the Site Plan Approval Stage. Stormwater management controls will also be implemented in future planning stages to ensure no adverse stormwater management-related impacts from the post-development condition.

HOMELESSNESS PREVENTION AND AFFORDABLE HOUSING

The Official Plan outlines policy regarding homelessness prevention and housing, including the provision of affordable housing. Policy 497_ states objectives regarding housing, including providing affordable housing and a mix of housing options for varying life stages and experiences. Four strategic areas are identified to meet housing goals, including ‘Creating Housing Opportunities’ and ‘Affordable Housing’ (policy 498_).

Policies 506_ and 508_ relate to housing opportunities and support infill and intensification in a variety of forms where infrastructure, transit, and other public services are available, as well as a broad range and mix of housing types and densities. As discussed in this Report, the Subject Lands are appropriately located in a Rapid Transit Corridor Place Type to facilitate high density apartment built form and a greater utilization of the Subject Lands.

Policies 516_ to 523_ relate to affordable housing. Policy 516_ identifies a 25% target of new housing to be affordable to low- and moderate-income households. The Proposed Development intends to provide 10% (approximately 43 units) deeply affordable housing (80% of average market rent, as defined in *Table 1* of this Report). Remaining units will be provided at or near the City’s average market rent to facilitate low to middle income housing, including students and seniors. The proposed units are generally designed for renters who make around \$50,000-60,000 annually, and to whom a \$1,500 monthly rental cost would represent approximately 30% of gross household income.

Per recent City of London staff report from June 9, 2025 (“*Housing Stability for All Plan 2024 Update*”), the City of London continues to experience a housing and homelessness crisis. The June 2025 staff report states that as of December 2024, there were 1,914 unique individuals on the City’s By-Name List (a real-time list of people experiencing homelessness) and the City’s Community Housing waitlist increased by 329 households (4.7%), to a total of 7,311 households at the end of 2024.

Per additional City of London staff report from April 29, 2025 (*“Housing Accelerator Fund: Completion of the City of London Housing Needs Assessment”*), there is a shortage of one-bedroom and bachelor apartments in the City and renting households are more susceptible to affordability issues. The April 2025 staff report states that London has 94,305 households consisting of either single individuals or couples without children but only 26,920 one-bedroom dwelling units available (28.5% availability). Further, households in one-bedroom units account for 64.8% of all low-income households. This is further reflected in the Official Plan, which identifies that *“more than 60% of Londoners live alone or with only one other person”*⁴.

Per the June 2025 and April 2025 City of London staff reports above, there is a critical need for affordable one-bedroom and studio units in the City. The Proposed Development provides 432 units and is a private development initiative to help meet this need as it targets 10% deep affordability and a unit mix of 312 studio/bachelor (72%), 72 one-bedroom (17%), and 48 two-bedroom (11%).

Further, the 2023-2027 City of London Strategic Plan emphasizes affordability and recommends prioritizing approval of housing projects that increase the depth of affordability (Outcome 2.1, Strategy [a]). The City of London is also updating its Housing Stability Action Plan for Council consideration in May 2026, which is drafted with strategic areas of focus to increase affordable housing and housing stock (*“London & Middlesex Housing Stability Action Plan [2026-2031]”*)

Regarding the Proposed Development, Policy 521_ of the Official Plan states: ***“Building height and densities may be increased, in conformity with the Our Tools part of this Plan, to support the provision of affordable housing in planning and development proposals.”*** The height and density of the Proposed Development are generally permitted in the Official Plan and otherwise considered appropriate for the area. The proposed height and density maintain the intent of the Rapid Transit Corridor and facilitate the provision of affordable housing in the City.

GREEN AND HEALTHY CITY

The Official Plan outlines policy regarding *“green and healthy”* development. Goals of this section include mobility and public transit options, a range of housing choice and affordable options, and regenerated urban neighbourhoods (policy 697_). Policy 698_ states the City will be designed to achieve levels of density and connectivity that minimize travel distances between destinations. Policy 727_ states that growth and development will be planned to be compact, mixed-use, transit-supportive and conducive to active forms of mobility.

The Proposed Development contributes to the green and healthy goals of the Official Plan as it provides a high density residential apartment on a Rapid Transit Corridor and efficiently utilizes municipal investment in public transit, including future rapid transit. The Proposed Development facilitates alternative mobility options to the automobile as it emphasizes active transportation and public transit options for resident movement and reduces the provision of parking along a Rapid Transit Corridor. The Proposed Development will additionally contribute to the City of London target

⁴ Official Plan, page 6, (*“Did You Know”*)

of a 32.5% mode share for walking, cycling, and transit by 2050⁵ as it reduces reliance on personal automobiles in design.

The Proposed Development further utilizes municipal investment in public recreation, including parkland, and future residents will be in proximity and walking distance to a number of recreational community amenities, including surrounding parks, centres, and the Thames Valley Corridor.

RAPID TRANSIT CORRIDOR AND PROTECTED MAJOR TRANSIT STATION AREAS

The Official Plan provides land use policy for the Rapid Transit Corridor Place Type designation and the Rapid Transit PMTSA overlay (see **Figure 4** and **Figure 5** of this Report, respectively). Rapid Transit Corridors are intended to be vibrant, mixed-use, and mid-rise corridors that permit heights between 2-25 storeys. The Official Plan notes that not all segments will be the same in character, use, and intensity (policy 826_). Rapid Transit Corridors are planned for walkable streetscapes and may allow for a greater intensity and height of development to support transit usage where close to transit stations (policy 827_).

The Official Plan directs greatest intensification within the Rapid Transit Corridor and Major Transit Station Areas, however we note that this intensification may not be possible along all sides of Wellington Road given the constrained context of the surrounding area. As such, the Subject Lands represent one of the few opportunities for high-rise development along the north section of Wellington Road and to achieve the intensification goals of the Official Plan in this area.

The character of Wellington Road notably varies from north to south, with smaller residential lots observed in the north and larger commercial lots and surface parking in the south. This character is also observed in the road takings and planned width for the Wellington Gateway BRT project, which has created shallower lots along Wellington Road in the north. The ability to develop more dense high-rise development in the north is constrained by these smaller, shallower lot sizes, as well as the presence of existing residents. Generally, lot assemblies would be required in the north to facilitate high-rise development – as proposed herein. High-rise development in the south is less constrained in this manner, and we would expect greater intensification in the south. This creates a potential imbalance of density along the Rapid Transit Corridor and would not equally distribute potential density along the entire length of the planned corridor.

Further, the Subject Lands are located in a unique area where the Rapid Transit Corridor Place Type and Protected Major Transit Station Area overlay applies to two streets (Wellington Road and High Street), indicating the intent of the Official Plan for greater intensity in this location. The Subject Lands provide a feasible option for high-rise affordable housing in an area at the north of Wellington Road where few existing options are observed, and the Proposed Development will help facilitate the planned city structure of the Official Plan.

⁵ City of London, “Mobility Master Plan”, July 2025

As outlined in policy 830_, the intent of the Rapid Transit Corridor Place Type is in part to allow for a range of uses and greater intensities close to rapid transit stations, require pedestrian- and transit-oriented built form, and support a variety of residential types (including size, affordability, tenure, and design). Standalone residential development is permitted, and mixed-use development is encouraged but not required for all development. The Proposed Development meets the intent of development within the Rapid Transit Corridor Place Type as it provides a higher density, affordable, purpose-built rental apartment building and contributes to the variety of residential types existing and planned along the corridor and in the surrounding area.

Per policy 840_, as discussed on the following pages, the following intensity policies apply within the Rapid Transit Corridor Place Type:

<i>Policy 840_</i>	<i>Response</i>
<i>1. 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.</i>	As discussed above in Section 3.1 of this Report (Area Context), the Subject Lands have limited interface with adjacent residential and/or sensitive uses. The proposed apartment building is massed to the west of the site, towards High Street, and compatible with the existing area, including the adjacent high rise residential apartment planned by the Applicant. The proposed high-rise form is complementary to the adjacent planned high rise, with a variation in height (25 storeys and 27 storeys) and a comprehensively planned ground floor. A reduced interior yard setback is required to facilitate the Proposed Development, however the proposed setback in the north yard represents a pinch point and the interior yards are otherwise generally sufficient for compatibility. Refer to Section 6.3 of this Report below for further discussion of the proposed setbacks.
<i>2. Commercial buildings should not exceed 6,000m² in size within Corridors.</i>	No commercial use is proposed.
<i>3. Each Rapid Transit Corridor Place Type and Protected Major Transit Station Area will be planned to achieve a minimum number of 120 residents and jobs combined per hectare</i>	The Proposed Development is planned for 432 units or an approximate population of 620, per the density assumptions within the City of London “2021 Development Charges Background Study”. ⁶ Across a 0.18 hectare site, this results in approximately 3,444 residents per hectare, which meets and exceeds the Official Plan minimum for a Rapid Transit Corridor.
<i>4. Within the Rapid Transit Corridor Place Type and</i>	The Proposed Development achieves a residential density of approximately 2,368 units per hectare, which meets and

⁶ High Density Apartment 1-bedroom: **1.38** persons per unit; High Density Apartment 2-bedroom: **1.87** persons per unit

<i>Protected Major Transit Station Area, the minimum density is 45 units per hectare for residential uses or a floor area ratio of 0.5 for non-residential uses.</i>	exceeds the Official Plan minimum for a Rapid Transit Corridor.
<i>5. 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.</i>	A lot assembly of four parcels facilitates the Proposed Development. Two accesses are proposed to High Street, less than the three existing and appropriate for a Neighbourhood Connector. The south driveway is planned to be shared with the east planned apartment building and consolidates overall vehicular access to the street. No fragmented or isolated lots are created.
<i>6. Lots will be of sufficient size and configuration to accommodate the proposed development and to help mitigate planning impacts on adjacent uses.</i>	The proposed high density apartment building can be accommodated without adverse impact to adjacent uses. Generally, sufficient setbacks to abutting uses are provided or pinch points are addressed through the proposed ZBA. Minimal sensitive uses are located adjacent to the Subject Lands. Per the TIA (MDT, June 2026), no adverse traffic impacts are anticipated at the site entrance or proposed driveway configuration.
<i>7. Individual buildings will not contain more than 2,000m² of office space, except within 150 metres of rapid transit stations where buildings may contain up to 5,000m² of office space...</i>	The Proposed Development does not propose office space.
<i>8. & 9. Policy deleted</i>	N/A
<i>10. The Zoning By-law will include regulations to ensure that the intensity of development is appropriate for individual sites.</i>	Refer to Section 6.3 of this Report for a discussion of the proposed implementing ZBA.
<i>11. The full extent of intensity described above will not necessarily be permitted on all sites within the Rapid Transit and Urban Corridor Place Types.</i>	The proposed intensity is appropriate within the Place Type as it facilitates affordable and purpose-built rental units in an area highly serviced by public transit and meets the planned intent of the Official Plan. The existing context is generally low-density or mid-rise apartments, and is expected to evolve per planned City structure and investment in transportation infrastructure. Further, policy 521_ states that building height and densities may be increased to support the provision of affordable housing.

Policy 841_ of the Official Plan outlines policy regarding built form within the Rapid Transit Corridor Place Type. This policy is addressed in greatest detail through the supporting Urban Design Brief (Scorgie Planning, June 2026), submitted separately to this Report. However, from a land use perspective, the Proposed Development is an appropriate built form within the surrounding planned context and considering the priority objective of providing affordable housing. The built form is oriented toward and has principal entrance facing the public street (High Street). The proposed density is supportable per policy 521_ of the Official Plan, which accommodates for the provision of affordable housing.

SUMMARY / CONFORMITY STATEMENT

The City of London Official Plan, as amended, guides land use planning and development across the City. The above analysis demonstrates that the Proposed Development conforms to the key directions and policies of the Official Plan by providing for affordable, compact, and transit-supportive development in an appropriate location and at an appropriate density. The Proposed Development represents a better utilization of land along an identified Rapid Transit Corridor and within an MTSA that will contribute to complete communities within the City of London. Therefore, the Proposed Development and corresponding Amendments conform to and implement the applicable policies and objectives of the Official Plan

6.3 CITY OF LONDON ZONING BY-LAW Z.-1

The Subject Lands are subject to the City of London Zoning By-law Z.-1 (the ‘Zoning By-law’) and are currently compound zoned “Holding Residential R3/Transit Station Area 1 (R3-2/h-13-TSA1)”.

Per Section 3.9 of the Zoning By-law, within a compound zone, the Subject Lands are subject to the permissions and provisions of all applicable zones. Each zone shall be considered separately and where two or more zones permit the same use and/or regulations, the least restrictive regulation will be applied. As such, both the Residential 3 and Transit Station Area 1 zones are applicable to the Subject Lands.

Additionally, there is a Holding provision (h-13) applied to the Subject Lands, which is expected to remain until the Wellington Gateway project is completed and servicing arrangements are confirmed for the Subject Lands. A similar Holding provision is applied to other lots within the surrounding area and along Wellington Road. The Wellington Gateway project is anticipated to be complete in 2028, at which point the Holding provision may be lifted.

A review of applicable regulations is provided below in **Table 3**, comparing the currently permitted to the Proposed Development. Areas of deficiency are bolded and identified in orange in the ‘Proposed’ column. To facilitate the Proposed Development and address these deficiencies, a Zoning By-law Amendment (‘ZBA’) is required.

Table 3 – Zoning By-law Review Table

Applicable Zone (per 3.9(1)(i))	Regulation	Permitted	Proposed
TSA1	Permitted Use	Apartment Building	Apartment Building
R3-2	Lot Area (min)	360m ²	1,823m ²
TSA1	Lot Frontage (min)	30m	48m
TSA1	Front Yard Depth (min-max)	1.0m-3.0m	1.5m
TSA1	Exterior Yard Depth	N/A	N/A
TSA1	Interior Yard Depth (min)	3.0m	1.6m
TSA1	Interior Yard Depth Abutting a Residential Zone (min)	14.5m	8.1m
TSA1	Rear Yard Depth (min)	7.5m	9.9m
TSA1	Landscaped Open Space (min)	10%	8%
TSA1	Lot Coverage (max)	80%	46%
TSA1	First Storey Height (min)	4.0m	4.25m
TSA1	Height (min-max)	8.0m-82.0m	77.5m
TSA1	Residential Density (min)	45 UPH	2,368 UPH
TSA1	Floor Area Ratio (max)	6.5	10.58
TSA1	Gross Floor Area Office (max)	5,000m ²	0 m ²
TSA1	Amenity Area (min)	6.0m ² per residential unit	1.6m² per residential unit
TSA1	Step Back	1.5 metres between 8.0 metres and 21.0 metres (for building greater than 21.0 metres)	N/A
R3-2	Maximum Number of Units Per Lot (max)	4	N/A
R3-2	Parking Area Coverage (max)	25%	0%
General Provisions	Parking (min)	N/A in Rapid Transit Corridor Place Type	0 spaces
	Visitor Parking	No requirement	9
General Provisions	Electric Vehicle Parking Spaces	5% of spaces (for building with more than 40 res. units)	N/A
General Provisions	Parking (Short-Term Bicycle) (min)	0.1 spaces per unit	0.26 spaces per unit
General Provisions	Parking (Long-Term Bicycle) (min)	0.9 spaces per unit	0.28 spaces per unit

Further to Table 3 above, we acknowledge that section 52.3 of the Zoning By-law does require a more restrictive rear yard depth where abutting any lands zoned R1, R2, or R3. The rear abutting use is currently zoned R3-2/h-13/TSA1 but has an active planning application on behalf of the Applicant for a site-specific TSA1 zone. As such, we suggest that the more restrictive rear yard depth of Section 52.3.2 of the Zoning By-law should not apply to the Proposed Development. The stated rear yard depth of 7.5 metres, as otherwise required by Section 52.3.1 of the Zoning By-law, should apply and this is met and exceeded by the Proposed Development.

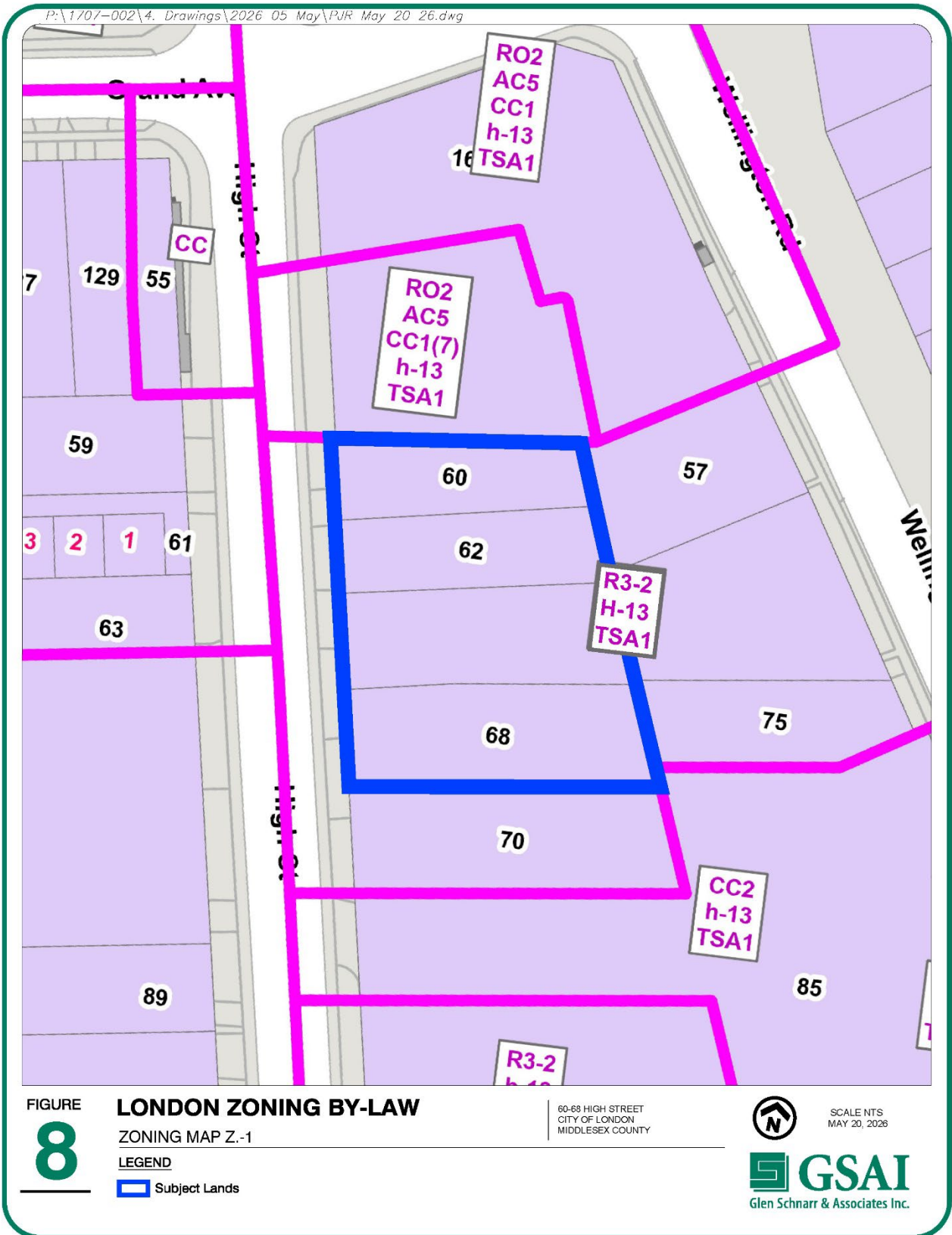
Nine amendments are required to the Zoning By-law to facilitate the Proposed Development. These are summarized in **Table 4** below, as well as rationale for the proposed amendments.

Table 4 – Zoning By-law Amendment Rationale

Requested Exemption	Rationale
Interior Yard Depth	To implement the desired built form, while maintaining appropriate compatibility and transition to the abutting sites. This amendment addresses a 1.6 metre pinch point at the east of the north interior yard, at the rear of the building. The remainder of the north interior yard is greater in size and will continue to facilitate bike parking, pedestrian access, and building exit. The abutting use to the north is vacant and zoned RO2/AC5/CC1(7)/h-13/TSA1.
Interior Yard Depth Where Abutting a Residential Zone	To implement the desired built form, while maintaining appropriate compatibility and transition to the abutting sites. An 8.1 metre setback depth is provided to the south interior side yard, which facilitates a pedestrian path, driveway access, and building exit. We acknowledge that Section 52.3.2 of the Zoning By-law establishes a more restrictive minimum interior side yard depth where abutting any lands zoned R1, R2, or R3. The abutting use to the south is an existing, non-conforming apartment building (5 units) within the R3-2/h-13/TSA1 zone. As the existing use to the south (apartment building) is not permitted in the R3-2 zone (nor R1 or R2), we suggest that the more restrictive interior yard depth of Section 52.3.2 of the Zoning By-law should not apply to the south interior side yard. The south abutting apartment is not the intended built form for an R3 zone, is generally more appropriate for the existing TSA1 zone, and should be interpreted as a TSA1 zone. The proposed setback of 8.1 metres is greater than the 3.0 metres that would otherwise be required to a typical R3 zone.

Landscaped Open Space	To implement the desired built form and provide additional affordable housing units. The proposed minor decrease facilitates a practical site design that can be more efficiently developed with affordable purpose-built rental units. The Subject Lands are located in an area with accessible green space and a stormwater strategy will be implemented to ensure post-development flows are managed.
Floor Area Ratio	To implement the desired built form and provide additional affordable housing units. The proposed increase is considered contextually appropriate as it upholds the planned City structure, there are no identified servicing constraints for the proposed amended Ratio, and the apartment built form is consistent with the general purpose and intent of the TSA1 Zone Category. The increased massing will have limited impact on the surrounding properties, which include vacant, commercial, and residential uses.
Amenity Area	To implement the desired built form and provide additional affordable housing units. The practical design of the apartment building and a reduction of amenity area facilitates the affordability of purpose-built rental units. Within the surrounding context, there are multiple public and private amenities walkable to the Subject Lands, including Watson Street Park on the east side of Wellington Road and the Thames Valley Corridor to the north and recreation facilities to the west. Given the sufficient public amenity in the surrounding area, the proposed amenity rate is considered appropriate for a design that prioritizes affordable units.
Step Back	To implement the desired built form and provide additional affordable housing units. The apartment building is planned to be constructed as a pre-cast concrete building in effort to streamline construction and reduce housing costs, thus facilitating affordable residential units. To accommodate the pre-cast construction method, a practical design is required that eliminates the requirement for a step back on the apartment building. Additional design methods are provided to reduce the visual and massing impact of the proposed apartment, including an enhanced seventh floor and material differentiation above the seventh floor. Refer to the Urban Design Brief (Scorgie Planning, June 2026) for further discussion of the proposed architectural expression. This practical design facilitates a functional and affordable development that facilitates the provision of much-needed affordable units.

Maximum Number of Units Per Lot	To implement the desired built form and provide additional affordable housing units. This regulation applies as the Subject Lands is in a compound zone with the R3-2 zone. The R3-2 zone does not permit apartment dwellings and is not intended for intensified development. As the TSA1 zone permits high-rise apartment dwellings and additional site standards, the proposed use and built form is permitted and the R3-2 standards generally do not apply. However, the TSA1 zone does not have a regulation for maximum number of units per lot, and so does not prevail in this case. As a result, the proposed amendment shall not apply this R3-2 standard to the Proposed Development, which otherwise generally meets the intent of the TSA1 zone.
Electric Vehicle Parking Spaces	To implement the desired built form and provide additional affordable housing units. There is no resident parking requirement for the Proposed Development and no resident parking spaces are required. However, 9 visitor parking spaces are provided. The Zoning By-law does not differentiate between resident parking spaces and visitor parking spaces in the implementation of this regulation. In context with the Proposed Development, no electric vehicle charging spaces are anticipated to be utilized by residents and therefore this regulation should not apply.
Parking (Long-Term Bicycle)	To implement the desired built form and provide additional affordable housing units. A sufficient number of bicycle parking spaces are provided for residents in an area highly serviced by public transit and anticipating that public transit will be the primary mode of transportation for future residents. As such, a reduced rate of long-term bicycle parking spaces is proposed, with the benefit of preserving additional floor area for resident amenity area and affordable residential units. The proposed reduction in long-term bicycle parking is offset by an increase in short-term parking spaces by approximately 160% from the zoning requirement (0.26 short-term spaces per residential unit provided, whereas only 0.1 required). Further, 50 of the short-term spaces are covered and weather protected under the south building overhang. These 50 spaces are defined in the Zoning By-law as short-term spaces but will provide additional protection for resident bicycles. An overall combined total of 0.54 bicycle spaces per residential unit is provided in the Proposed Development.



7.0 SUMMARY & CONCLUSION

As outlined above, the Proposed Development and corresponding Zoning By-law Amendment and Official Plan Amendment represent an appropriate development for the Subject Lands that meet the intent and objectives of the Provincial Planning Statement and the City of London Official Plan. Further, based on an analysis of the surrounding area, technical reports, and policy context, we conclude that the Proposed Development represents good planning as:

1. The Proposed Development represents appropriate development on the Subject Lands given the existing use of the Site, planned evolution of the Subject Lands and surrounding context;
2. The Proposed Development provides an appropriately designed and compatible infill development that will contribute to the achievement of a complete community;
3. The Proposed Development provides affordable housing options, including purpose-built rental units accessible to various incomes and ages;
4. The Proposed Development is consistent with the Provincial Planning Statement and has regard for matters of Provincial interest;
5. The Proposed Development conforms to The City of London Official Plan policy and key direction;
6. The Proposed Development provides appropriate density along a Rapid Transit Corridor and Major Transit Station Area;
7. The Proposed Development is located in an area well serviced by a mix of uses, including commercial and recreational amenities;
8. The Proposed Development is located in an area highly-serviced by existing and planned public transit;
9. The Proposed Development can be adequately serviced by existing municipal services;
10. The Proposed Development will not create adverse impacts to existing uses or the surrounding area and can be comprehensively planned with adjacent lands owned or managed by the Applicant; and,
11. The Proposed Development is in keeping with the planned context of the surrounding area and upholds the overall City Structure.

Accordingly, we conclude that the Proposed Development and corresponding Amendments are appropriate, represent good planning and implement the Provincial and Municipal vision for the Subject Lands.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

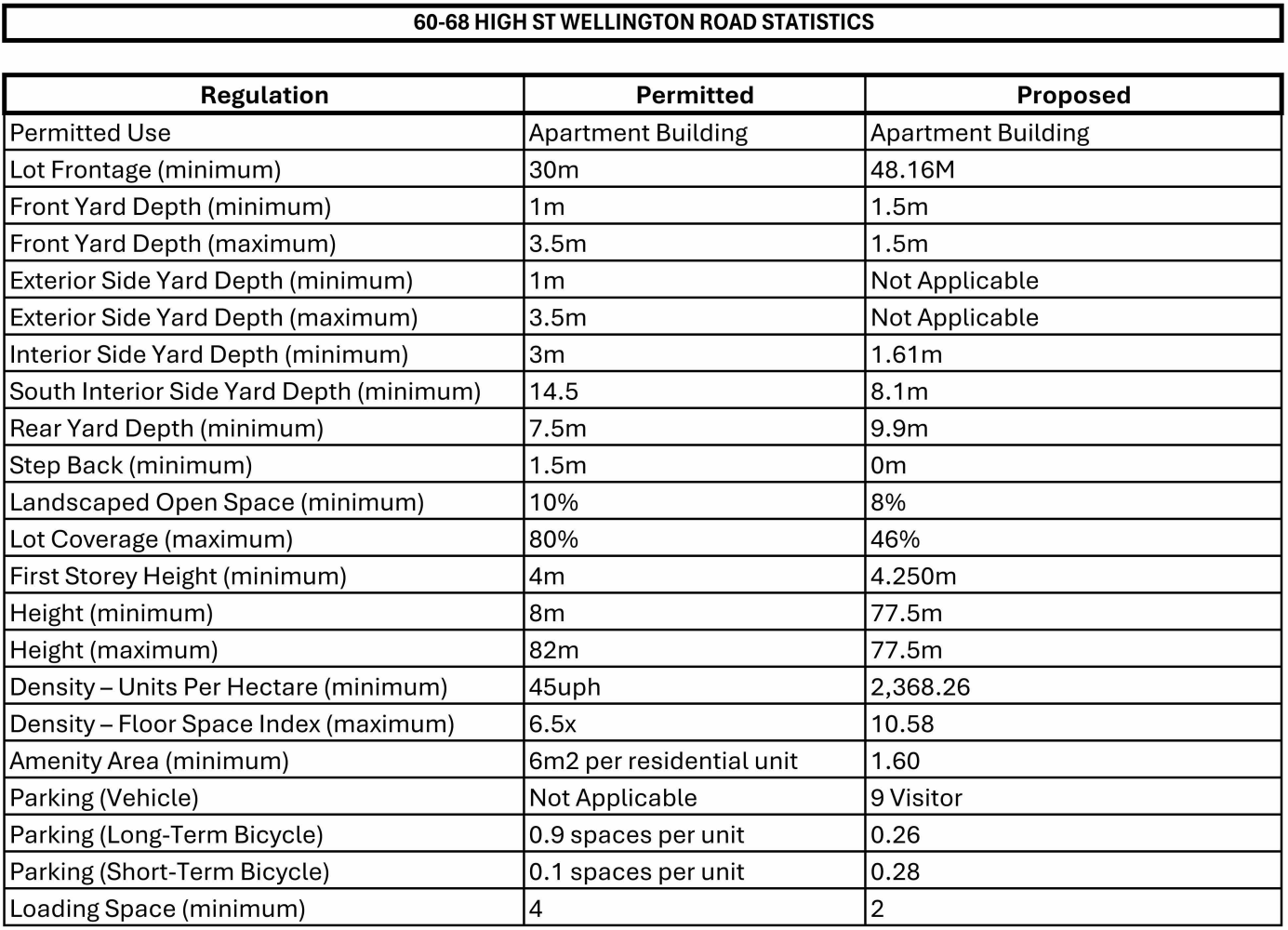


Jim Levac, MCIP, RPP
Partner



Zechariah Bouchard
Planner

APPENDIX I / *Architectural Plans (Goodplace Design, May 2026)*



MEASUREMENTS, LOT LINES, ETC. FEATURES. INDICATIONS OF GRADE ARE APPROXIMATE ONLY, BUT WITH THE REASONABLE ACCURACY FOR THE CONCEPTUAL PURPOSES INTENDED. CONTRACTOR SHALL VERIFY ALL PROPERTY LINES, HOUSE, STREET, LOT, AND CORNER MARKS AND BY-LAWS PRIOR TO ANY CONSTRUCTION. ALL DRAINAGE SHALL CONFORM TO APPROVED ENGINEERING SUBMISSION GRADES. CONTRACTOR MUST COMPLY WITH ALL PERTINENT CODES AND BY-LAWS. THIS DRAWING MAY NOT BE USED FOR CONSTRUCTION UNLESS AUTHORIZED BY THE ARCHITECT. COPYRIGHT RESERVED. THIS DRAWING IS THE EXCLUSIVE PROPERTY OF GOODPLACE DESIGN AND SHALL NOT BE USED WITHOUT CONSENT

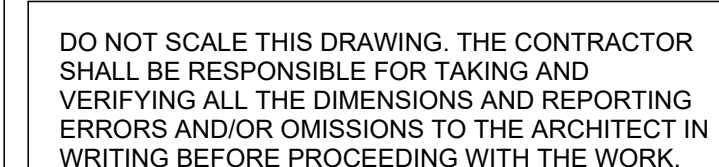
CLIENT: FOUNDATION CAPITAL C/O MICHAEL NEMANIC

LOCATION: 60-68 HIGH ST
LONDON, ONTARIO

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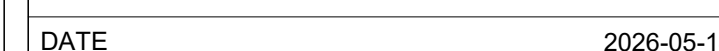
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P1 FLOOR PLAN

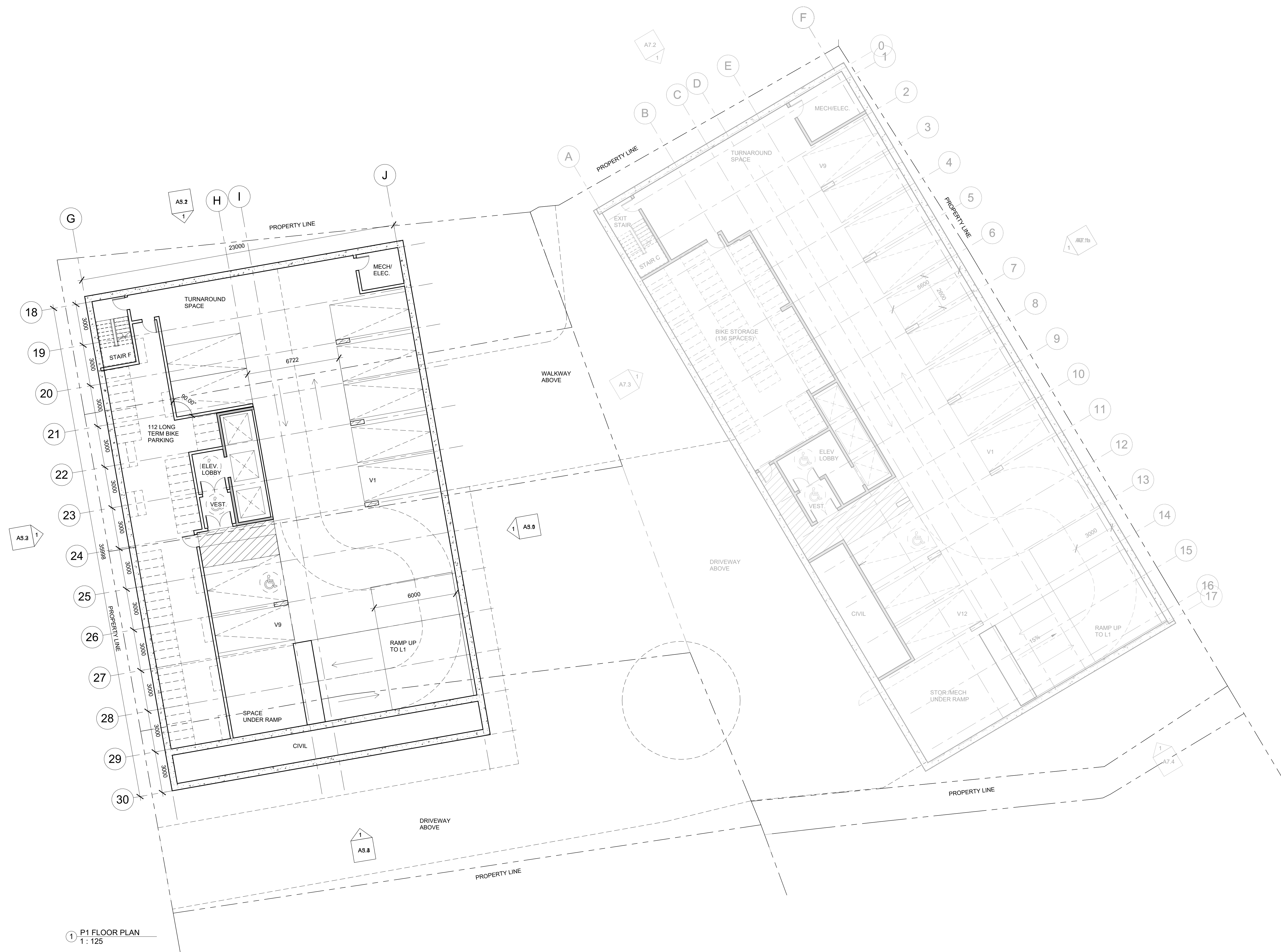
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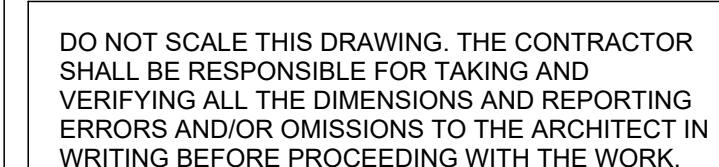
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L1 FLOOR PLAN

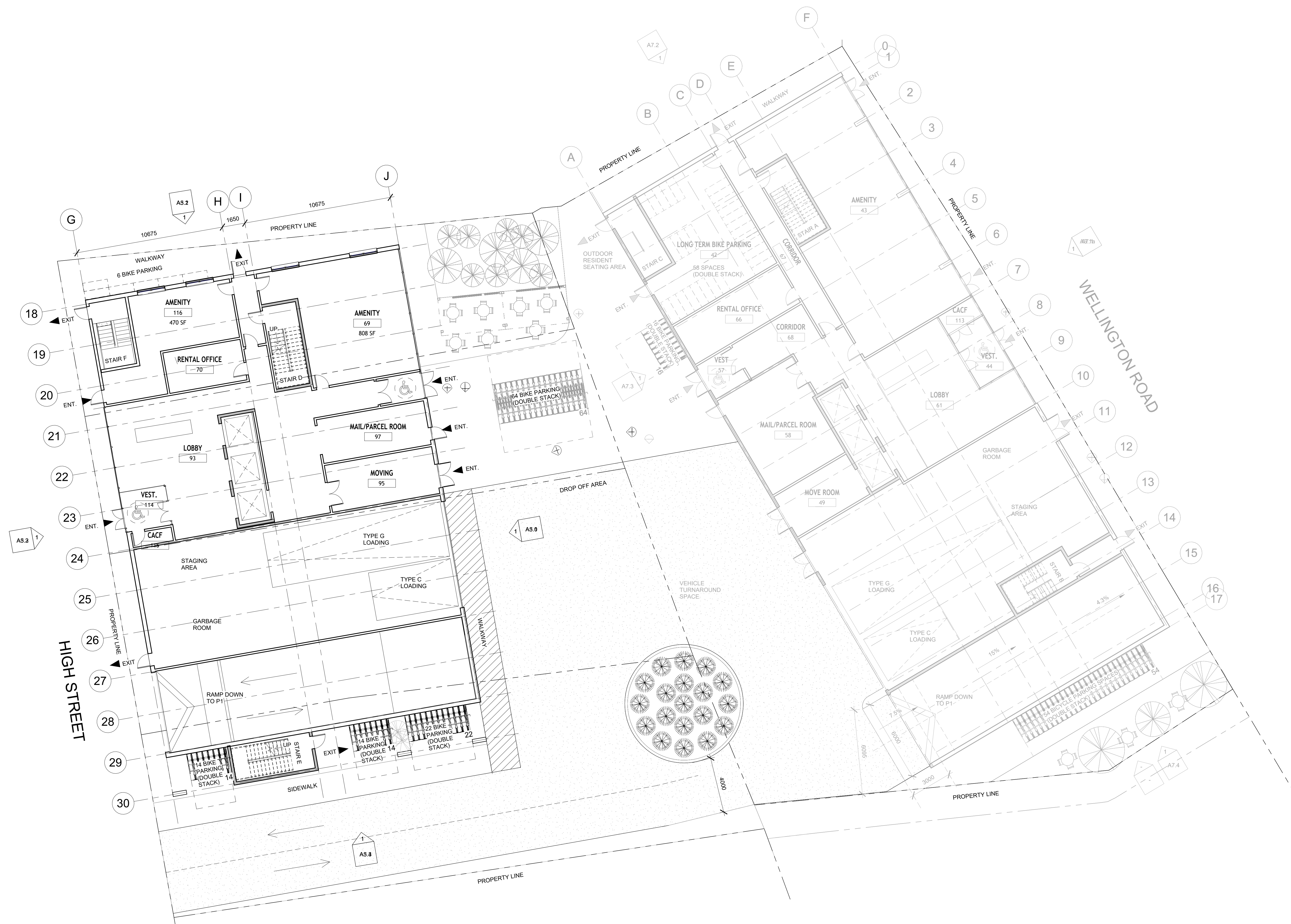
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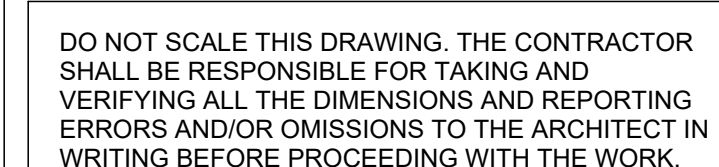
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1 1ST FLOOR
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LOCATION: 60-68 HIGH ST
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L2-L25 FLOOR PLAN

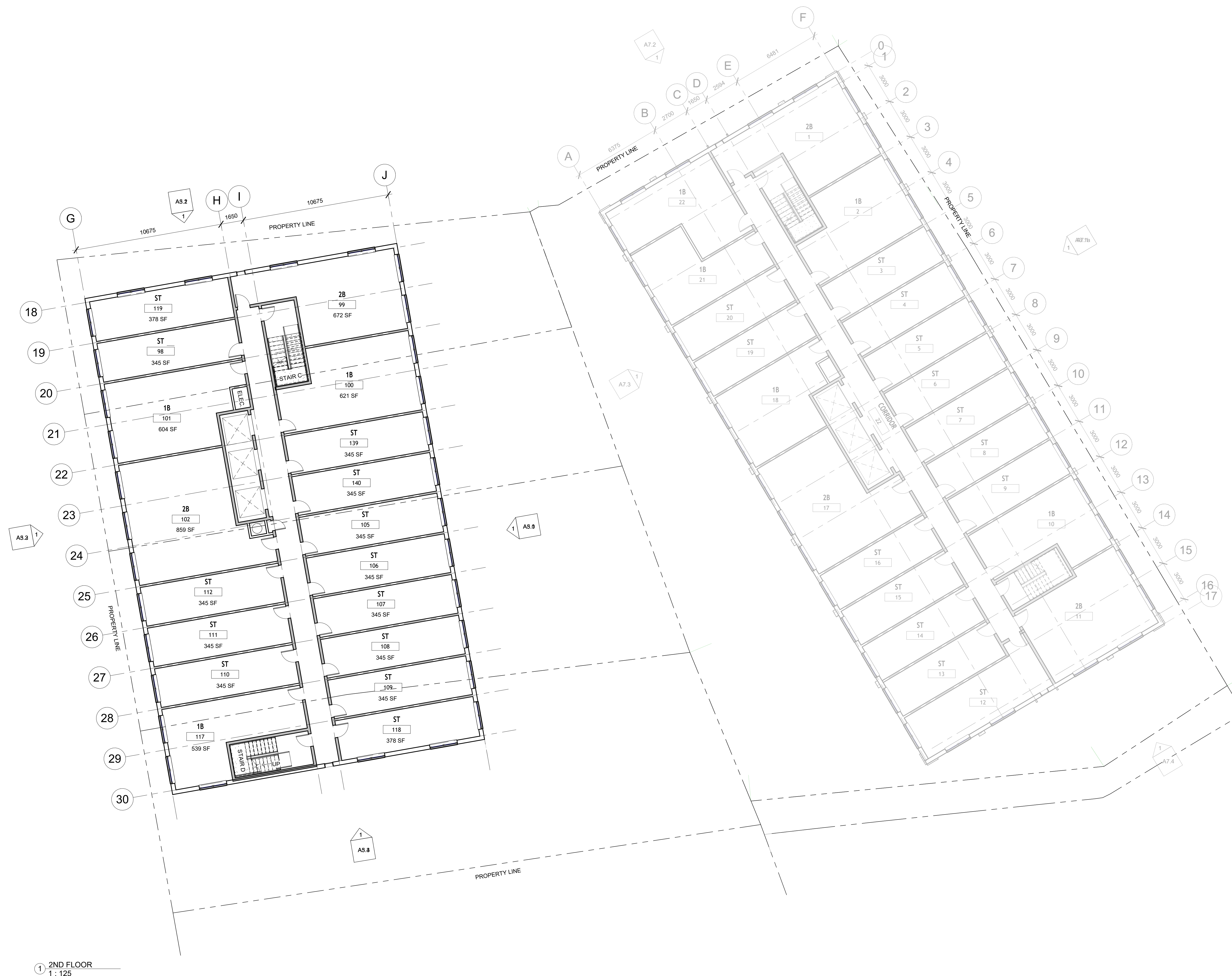
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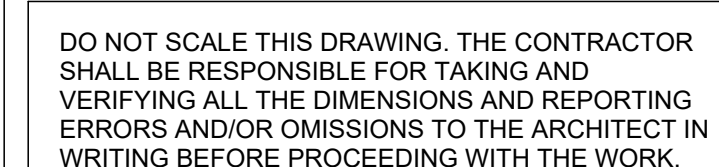
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① 2ND FLOOR
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LOCATION: 60-68 HIGH ST
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MECH ROOF/AMENITY FLOOR PLAN

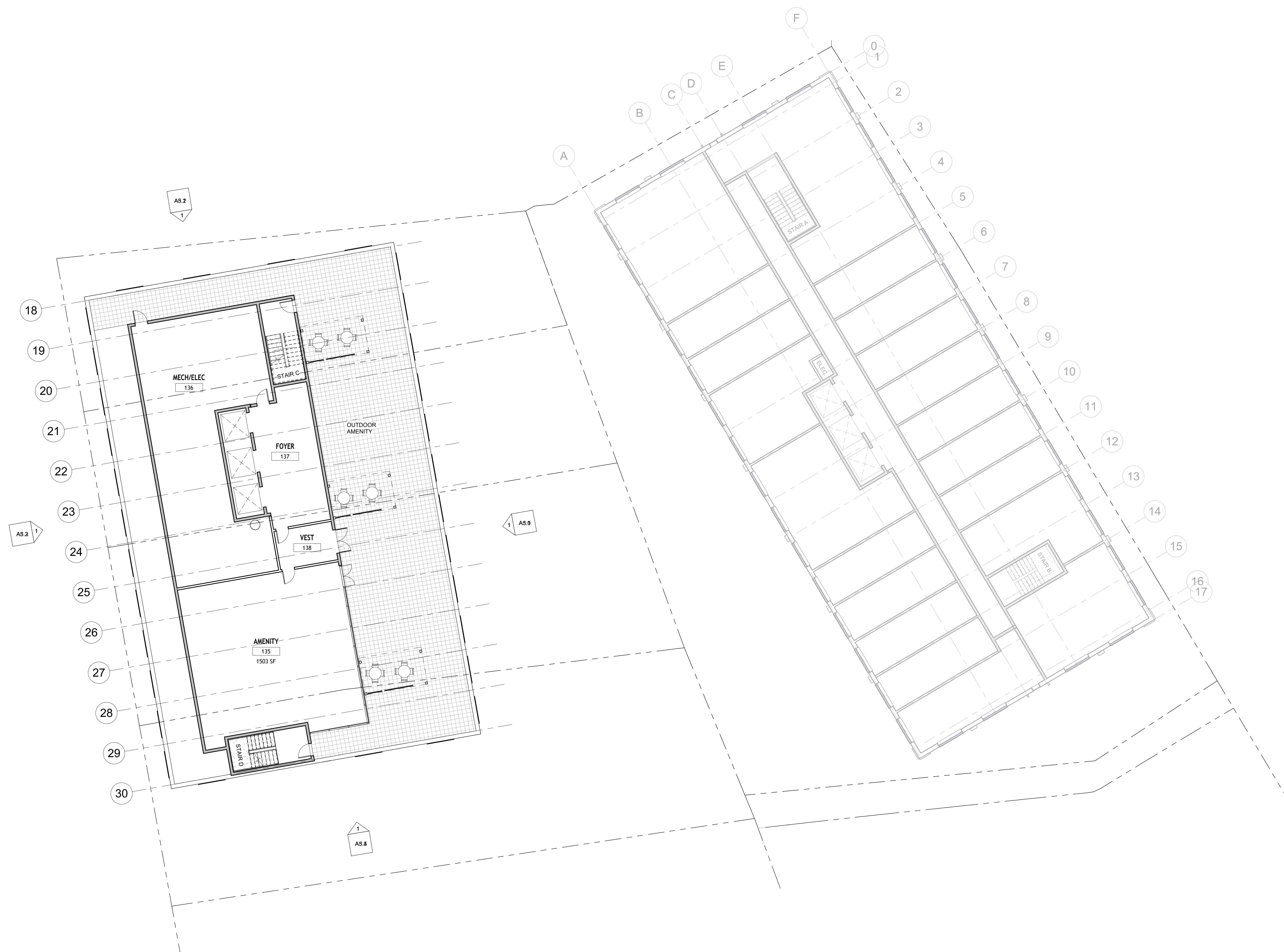
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APPENDIX II / Draft Zoning By-law Amendment

Bill No. XXX

2026

By-law No. Z.-1-26_____

A by-law to amend By-law No. Z.-1 to rezone
an area of land located at 60-68 High Street

WHEREAS this amendment to the Zoning By-law Z.-1 conforms to the Official Plan;

NOW THEREFORE the Municipal Council of The Corporation of the City of London enacts as follows:

1. Schedule "A" to By-law No. Z.-1 is amended by changing the zoning applicable to lands located at 60-68 High Street, as shown on the attached map **FROM** a Holding Residential R3/Transit Station Area (R3-2/h-13*TSA1) Zone **TO** a Holding Residential R3/Transit Station Area Special Provisions (R3-2/h-13*TSA(_)) Zone.

2. Section Number 52.4 of the Transit Station Area 1 (TSA1) Zone is amended by adding the following Special Provisions:

TSA1(_) 60-68 High Street

a) Regulations

i) Interior Yard Depth (minimum) – 1.6 metres

ii) Landscaped Open Space (minimum) – 8%

iii) Floor Area Ratio (maximum) – 10.58

iv) Amenity Area (minimum) – 1.6 square metres per residential unit

v) Step Back – Shall not apply

vi) Notwithstanding Table 7.3 of the R3 Zone, the maximum number of units per lot shall not apply.

vii) Notwithstanding Section 4.19(14) (Bicycle Parking Requirements), a minimum of 0.28 long-term bicycle parking spaces shall be required

viii) Notwithstanding Section 4.19(16) (Electric Vehicle Charging Stations), no electric vehicle charging stations shall be required

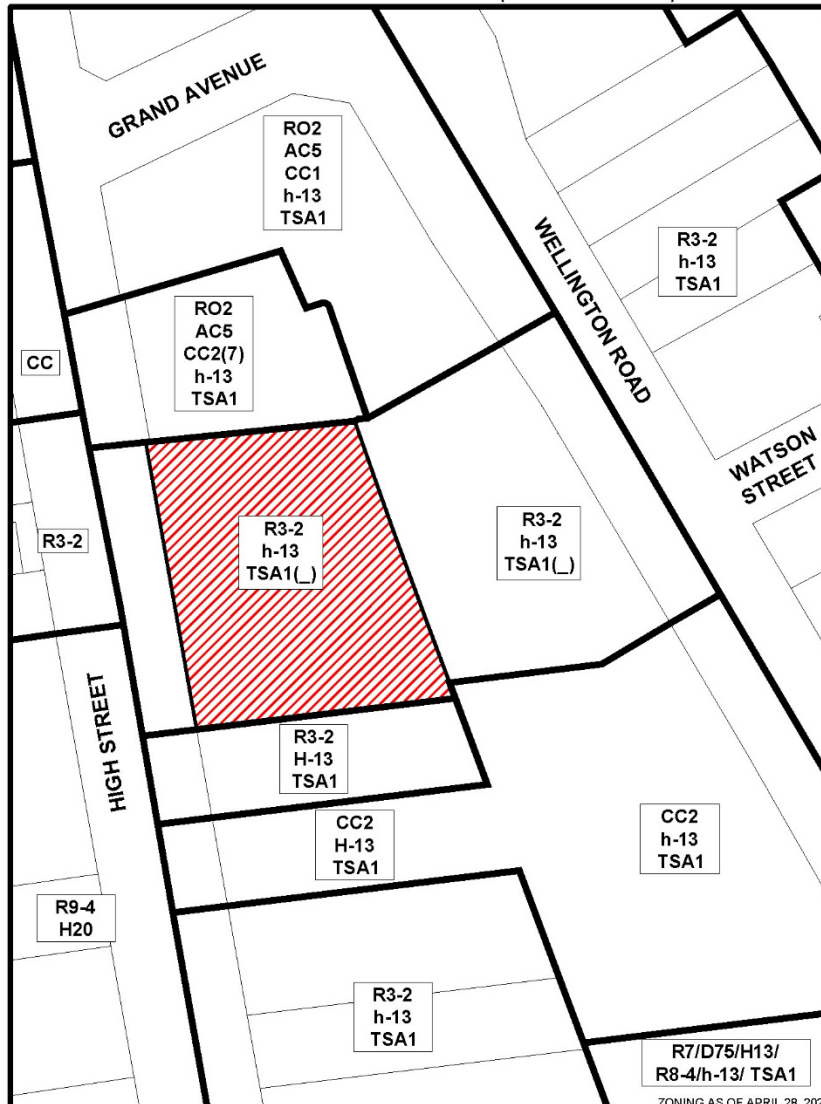
3. This Amendment shall come into effect in accordance with Section 34 of the Planning Act, R.S.O. 1990, c. P13, either upon the date of the passage of this by-law or as otherwise provided by the said section.

_____ in Open Council on XXXX, XXXX, subject to the provisions of PART VI.1 of the *Municipal Act*, 2001.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

AMENDMENT TO SCHEDULE "A" (BY-LAW NO. Z.-1)



File number:
 Planner:
 Date Prepared: 2026/05/20
 Technician:
 By-Law No: Z.-1-

SUBJECT SITE 

1:800

0 25 50 Meters



APPENDIX III / *Draft Official Plan Amendment*

Bill No. XXX

2026

By-law No. C.P.-1512()-__

A by-law to amend the Official Plan, The London Plan for the City of London, 2016 relating to 60-68 High Street

The Municipal Council of The Corporation of the City of London enacts as follows:

1. Amendment No. __ to the Official Plan, The London Plan for the City of London Planning Area – 2016, as contained in the text attached hereto and forming part of this by-law, is adopted.
2. This Amendment shall come into effect in accordance with subsection 17(27) or 17(27.1) of the *Planning Act, R.S.O. 1990*, c.P.13.

__ in Open Council on XXX, XXXX, subject to the provisions of PART VI.1 of the *Municipal Act, 2001*.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

AMENDMENT NO. X
to the
OFFICIAL PLAN FOR THE CITY OF LONDON

A. PURPOSE OF THIS AMENDMENT

The purpose of this Amendment is to amend a policy to the Specific Policies for the Rapid Transit Corridors Place Type and add the subject lands to Map 7 – Specific Policy Areas – of the City of London to permit a 25-storey apartment building.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to lands located at 60-68 High Street in the City of London.

C. BASIS OF THE AMENDMENT

The recommended site-specific amendment facilitates one 25-storey apartment building. The recommended amendment is consistent with the *Provincial Planning Statement, 2024 (PPS)*, which directs planning authorities to provide for affordable housing and an appropriate range and mix of housing options. The recommended amendment conforms to The Official Plan, including but not limited to Key Directions, City Design, and Rapid Transit Corridor Place Type policies. The recommended amendment will facilitate intensification of an underutilized site at an appropriate scale and intensity, contribute to a range and mix of housing types within the neighbourhood and provide an affordable, transit-supportive form of development along an identified rapid transit corridor on High Street.

D. THE AMENDMENT

The Official Plan for the City of London is hereby amended as follows:

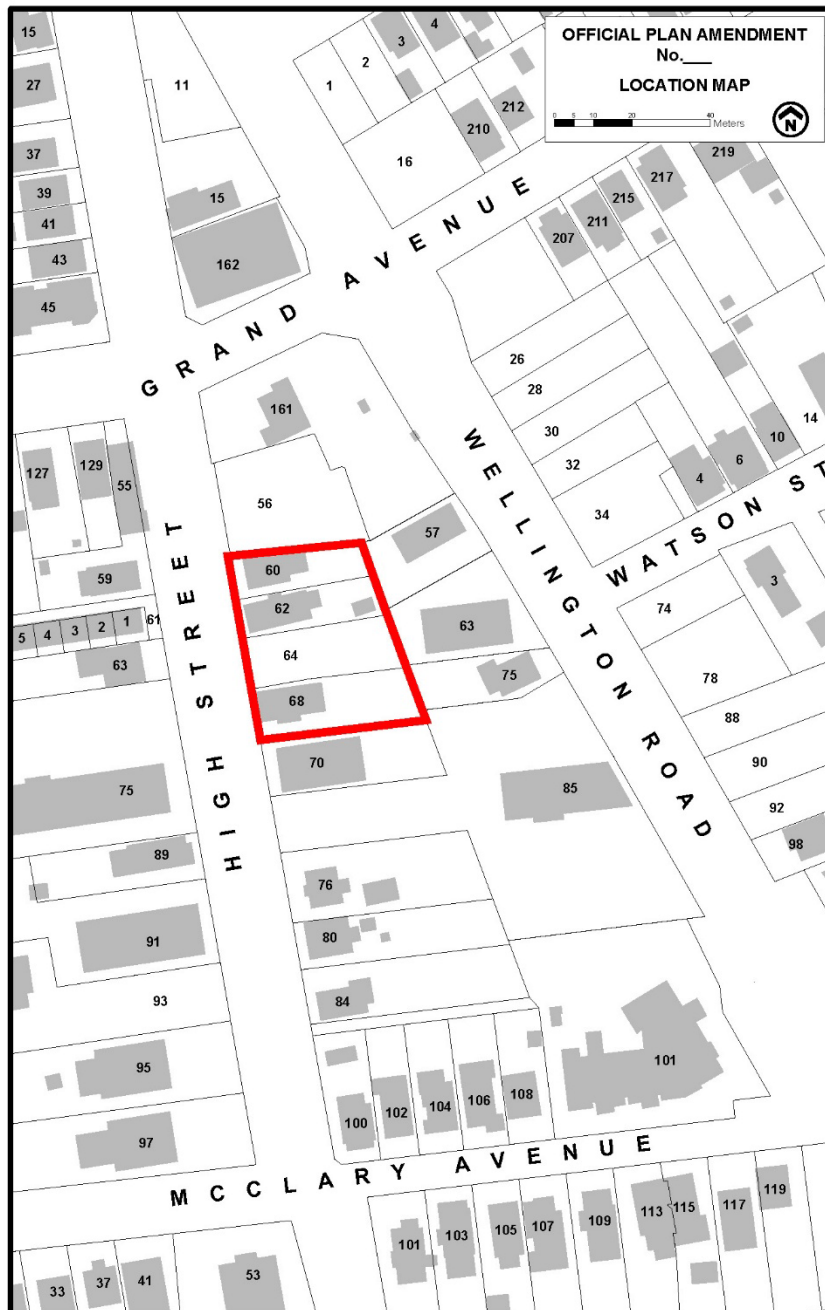
1. Specific Policies for the Rapid Transit Corridor Place Type of Official Plan, The London Plan, for the City of London is amended by adding the following:

(____) 60-68 High Street

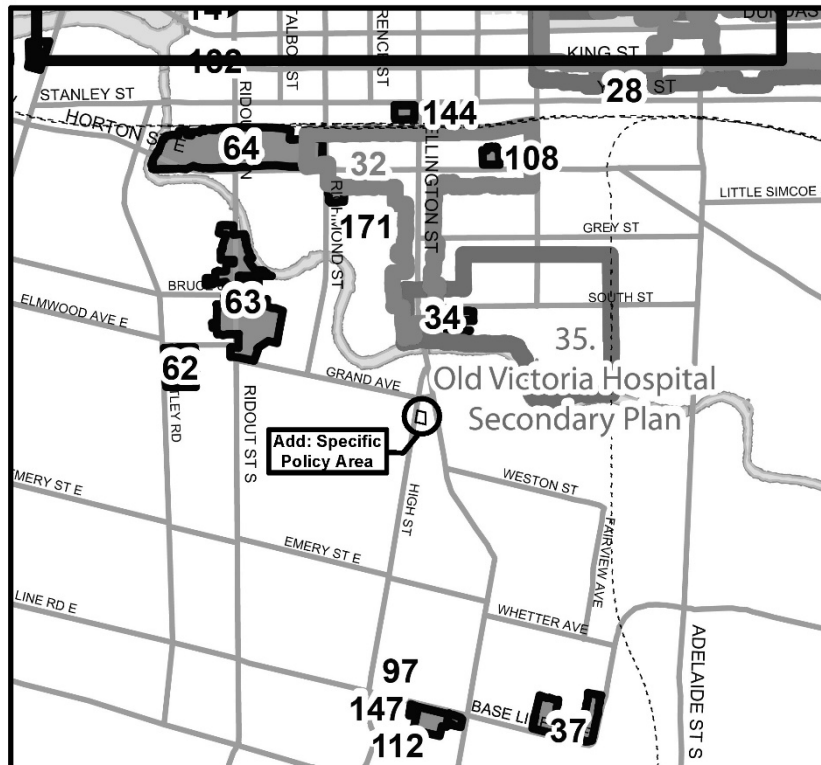
For the lands at 60-68 High Street, residential apartment buildings with a maximum height of 25-storeys, excluding the mechanical penthouse, may be permitted in addition to the existing permissions of the Rapid Transit Corridor Place Type.

2. Map 7 – Specific Policy Areas, to the Official Plan, the London Plan, for the City of London Planning Area is amended by adding a Specific Policy Area for the lands located at 60-68 High Street, as indicated on “Schedule 1” attached hereto.

"SCHEDULE 1"



AMENDMENT NO:



LEGEND

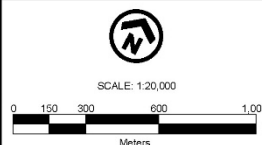
- Specific Policies
- Rapid Transit and Urban Corridor Specific-Segment Policies
- Near Campus Neighbourhood Area
- Secondary Plans

BASE MAP FEATURES

- Streets (See Map 3)
- Railways
- Urban Growth Boundary
- Water Courses/Ponds

This is an excerpt from Planning Divisions working consolidation of Map 7 - Special Policy Areas of the London Plan, with added notations.

SCHEDULE #
TO
OFFICIAL AMENDMENT NO. _____
PREPARED BY: GLEN SCHNARR & ASSOCIATES



File number:
Planner:
Technician:
Date: 2026/05/20