



2026.08.21

City of London
Planning and Development
300 Dufferin Avenue
London, ON N6A 4L9

**Re: Urban Design Brief Addendum
57–75 Wellington Road, London, Ontario (OZ-26078)**

Dear Planning and Development Staff,

Scorgie Planning has been retained by Foundation Development Fund I LP to prepare this Urban Design Brief Addendum in support of revisions to the proposed development at 57–75 Wellington Road in London, Ontario.

1.0 Introduction

This Addendum supplements the Urban Design Brief previously prepared by Scorgie Planning and submitted in support of the Zoning By-law Amendment application. The original Urban Design Brief addressed the lands municipally known as 57–75 Wellington Road and 68 High Street and assessed a 27-storey residential apartment building with an approximate height of 84.0 metres. It established the overall urban design framework for the proposal, including the organization of built form, the relationship to Wellington Road and High Street, pedestrian circulation, the public realm, building massing and architectural expression.

As reflected in the August 2026 resubmission materials, the lands associated with OZ-26078 are now identified as 57, 63 and 75 Wellington Road. The adjacent property at 68 High Street is included within the revised development application for 60–68 High Street, City File OZ-26079. The two applications nevertheless continue to be comprehensively planned in relation to one another, including through their internal circulation, amenity areas and built-form relationships.

The development proposal has also been revised through the ongoing application review process. The revised architectural plans prepared by Goodplace Design and circulated in August 2026 (the “Revised Architectural Plans”) maintain the fundamental site-planning and urban-design approach established through the original submission while introducing substantive refinements to building height and massing, building siting and spatial relationships, pedestrian circulation, ground-floor programming, amenity provision and architectural articulation.

The purpose of this Addendum is to assess the urban design implications of those revisions and update the conclusions of the original Urban Design Brief where appropriate. It also responds to the City’s current Urban Design comments for OZ-26078. Those comments continue to assess several characteristics of the original 27-storey submission — including its height, absence of a tower setback, limited ground-floor activation, original tower separation and original amenity condition — that have since been materially revised. Except where specifically addressed herein, the analysis and conclusions contained within the original Urban Design Brief remain applicable.

2.0 Revised Development Proposal

The revised development maintains the fundamental function and orientation of the original proposal while substantially modifying its scale and built-form expression.

Development Characteristic	Original Proposal	Revised Proposal
Application Site Area	approx. 2,097 m ²	approx. 1,572 m ²
Building Height	27 storeys / approx. 84.0 m	21 storeys / approx. 69.5 m
Gross Floor Area	approx. 23,417 m ²	approx. 16,617 m ²
Residential Units	572	440
Building Floor Plate	approx. 888 m ²	approx. 862 m ²
Fourth-Storey Stepback	No tower stepback above the lower building condition	1.5 m
Ground-Floor Retail	Not provided	approx. 134 m ²
Front Yard	1.14–1.60 m	2.0 m main wall / 0.5 m balcony
Interior Side Yards	1.59–1.94 m north / 1.56–6.28 m south	1.4–2.0 m north / 1.9–6.9 m south
Rear Yard	4.85–12.35 m	4.7–13.2 m
Tower Separation to Dev II	approx. 15.1–31.5 m shown in original plans	18.3–34.2 m
Resident / Visitor Vehicle Parking	Visitor parking proposed; no resident parking	None
Pick-up / Drop-off	None	7 spaces (shared with Dev II)
Bicycle Parking	190 long-term + 70 short-term spaces	196 long-term + 40 short-term spaces
Amenity Area	approx. 1.5 m ² per unit	approx. 1,106 m ² total / 2.5 m ² per unit; at-grade seating, rooftop outdoor amenity and lower-level balconies

The most significant revision is the reduction in building height from 27 storeys and approximately 84.0 metres to 21 storeys and approximately 69.5 metres. Gross floor area has similarly been reduced from approximately 23,417 square metres to approximately 16,617 square metres, while the proposed residential unit count has decreased from 572 to 440 units. The change in application lands also reduces the application site area from approximately 2,097 square metres in the original submission to approximately 1,572 square metres in the revised submission, principally reflecting the inclusion of 68 High Street within OZ-26079 rather than OZ-26078.

Because the revised application applies to a smaller land area, site-area-dependent statistics such as FSI should be understood in the context of the revised application boundary and should not, in isolation, be interpreted as a measure of the change in overall building mass.

On a like-for-like drawing basis, the building floor plate has been reduced from approximately 888 square metres to approximately 862 square metres. The City's current Urban Design comments characterized the original approximately 888-square-metre floor plate as generally consistent with accepted best practices for slender tower development. The revised floor plate is smaller again and remains below the 1,000-square-metre maximum floor-plate benchmark cited by Urban Design staff. The revised footprint also accommodates functionally accessible sidewalks on all sides of the building and reduces the breadth of the building mass while maintaining the modular construction approach.

The revised proposal incorporates a 1.5 metre stepback above the fourth storey, together with balconies at the second through fourth storeys. The revised ground floor introduces approximately 134 square

metres of retail space fronting Wellington Road, while primary building access remains from Wellington Road, with additional rear access and continuous pedestrian pathways around the building. Total amenity area is approximately 1,106 square metres, or 2.5 square metres per unit, and the revised plans identify at-grade outdoor resident seating, rooftop outdoor amenity space and private balcony opportunities at the lower residential levels.

The revised siting provides a front yard of approximately 2.0 metres to the main wall and 0.5 metres to the extent of the balcony structure; north interior side yards ranging from approximately 1.4 to 2.0 metres; south interior side yards ranging from approximately 1.9 to 6.9 metres; and a rear yard ranging from approximately 4.7 to 13.2 metres. The revised development also provides tower separation from the adjacent 60–68 High Street proposal ranging from approximately 18.3 metres to 34.2 metres, depending on location.

Visitor parking has been removed from the revised proposal; resident parking was not proposed in either the original or revised concept. Seven short-term pick-up/drop-off spaces are provided at the rear with access from High Street and are shared within the coordinated Dev I/Dev II circulation system. Bicycle parking has been reorganized from 190 long-term and 70 short-term spaces in the original proposal to 196 long-term and 40 short-term spaces in the revised proposal.

These revisions do not alter the fundamental organizing concept established through the original submission. Rather, they refine the physical expression of the proposal and respond to built-form, pedestrian-circulation and public-realm considerations identified through the application review process.

3.0 Updated Urban Design Assessment

3.1 Urban Structure and Site Organization

The fundamental site organization established through the original Urban Design Brief remains appropriate, but the revised proposal materially changes the factual basis of the City's current site-organization concerns.

The current Urban Design comments identify three principal concerns with the original condition: a localized side-yard pinch point, limited functional outdoor amenity space, and a Wellington Road frontage that combined the principal entrance and amenity uses with service functions and blank wall conditions. The August 2026 revisions address each of these matters through a smaller building footprint, continuous accessible pedestrian circulation, additional amenity opportunities and a new active retail use at the primary frontage.

Wellington Road continues to function as the principal public frontage and pedestrian-oriented interface for the development, while access, servicing and operational functions are concentrated toward the rear and High Street. The reconfigured footprint provides continuous accessible sidewalks on all sides of the building. The revised setbacks are not uniformly larger at every point — the north side yard remains locally constrained — but the overall geometry provides a legible and continuous pedestrian route and increases spatial relief along substantial portions of the south and rear conditions.

The revised amenity strategy is also materially stronger than the condition assessed in the City's comments. The amenity rate increases from approximately 1.5 to 2.5 square metres per unit, with approximately 1,106 square metres of total amenity area. This includes an at-grade outdoor resident seating/amenity area and rooftop outdoor amenity space, supplemented by balconies at the second through fourth storeys. The at-grade amenity area is an urban residential amenity space rather than

proposed public parkland; Parks Planning has separately identified cash-in-lieu of parkland as the applicable dedication mechanism at Site Plan Approval.

Watson Street Park remains an important nearby public open-space resource within the walkable context of the Site. The project team has advised that discussions are ongoing with City representatives regarding potential improvements to Watson Street Park in association with redevelopment. Any such improvements would be subject to separate agreement and are not relied upon as a prerequisite to the urban-design conclusions of this Addendum.

The introduction of approximately 134 square metres of ground-floor retail along Wellington Road is a particularly significant refinement. Together with the principal entrance, transparent and active ground-floor functions, lower-level balconies and the fourth-storey stepback, the retail use strengthens passive surveillance, adds daily activity and establishes a more consistently pedestrian-oriented frontage. Limited service functions remain necessary to building operation, but they no longer define the Wellington Road interface in the manner identified through the City's review of the original submission.

The revised proposal therefore retains the original hierarchy of frontages while materially strengthening site functionality, outdoor amenity and the pedestrian/public-realm role of Wellington Road. Localized setback and landscape constraints remain matters for detailed zoning and site-plan review. In addition, the setback figures in this Addendum are measured to the property lines shown on the Revised Architectural Plans; any required Wellington Road widening dedication and the resulting ultimate right-of-way relationship will require confirmation through the ongoing approval process.

3.2 Built Form, Massing and Transition

The revised proposal represents a substantial reduction in overall built-form scale relative to the submitted development and directly responds to the City's current concerns regarding apparent scale, massing and the distinction between the lower building condition and upper tower.

The reduction from 27 to 21 storeys decreases the building height by approximately 14.5 metres and brings the proposed 69.5-metre height within the height range identified for the Rapid Transit Corridor Place Type and TSA1 zoning framework. This materially changes the premise of the City's comment that the previously proposed 27-storey height was not contemplated in the applicable Place Type.

The revised tower floor plate is approximately 862 square metres. Urban Design staff expressly characterized the original approximately 888-square-metre floor plate as generally consistent with accepted best practices for slender tower development, and the revised plate is smaller again and below the 1,000-square-metre benchmark cited in the current comments. That 1,000-square-metre benchmark is also reflected in recent City zoning practice: the site-specific BDC1(5) provisions for 1727 Richmond Street establish a maximum residential tower floor plate of 1,000 square metres. The upper-floor plan for the subject proposal is approximately 46.3 metres in length by 18.6 metres in depth, producing a long-to-short dimension ratio of approximately 2.5:1. It therefore does not meet the City's cited 1:1.5 best-practice ratio when that ratio is applied as a strict geometric test.

The 1:1.5 ratio should nevertheless be understood as one urban-design indicator rather than a stand-alone measure of tower performance. The City's comments describe the ratio as a best-practice benchmark, while the relevant performance considerations are the resulting floor-plate area, shadow breadth, sky view, separation, privacy and visual mass. In this case, the relatively shallow approximately 18.6-metre building depth, north-south-oriented long axis and 862-square-metre floor plate produce a narrow slab profile. The elongated proportion is a direct consequence of the shallow unit module and

standardized planning system rather than an arbitrary broadening of the building mass. That geometry limits the lateral breadth of the building and its shadow relative to a deeper or more broadly massed tower of comparable floor area.

The revised design also introduces a 1.5 metre stepback above the fourth storey, lower-level balconies and a more active base condition. The London Plan policies cited in the City's comments contemplate podiums or comparable design solutions that reduce perceived height and mass. The revised stepback, balcony portals, 4.25-metre first-storey height, Wellington Road retail and differentiated lower-level articulation operate together as such a comparable base-building strategy. The 1.5 metre stepback now meets the minimum zoning standard identified in the City's review and eliminates the previously requested stepback relief; the additional 3.0-metre dimension remains an Urban Design recommendation rather than the minimum zoning requirement.

A conventional, separately expressed podium would also need to be assessed against the project's standardized precast and modular construction methodology. The building system relies on repetition, shallow unit depths and standardized structural modules to control construction complexity and cost. Requiring a materially different podium geometry would likely require customized modules without, in itself, demonstrating a superior public-realm outcome. A performance-based urban-design assessment is therefore appropriate where the revised design provides active frontage, pedestrian-scale articulation, a reduced tower plate and a compliant minimum stepback through a construction system intended to support housing affordability. The project includes a confirmed 10% deeply affordable component at 80% of average market rent, with an additional 40% affordable component at 100% of average market rent subject to expected government funding contributions.

The current Urban Design comments characterize approximately 25 metres of tower separation as accepted best practice and approximately 12.5-metre tower setbacks as the typical mechanism for preserving that relationship on adjoining sites. The 12.5-metre dimension is not identified in the applicable TSA1 zoning as a mandatory tower setback for the Site; rather, staff expressly frame it as the typical means of preserving a 25-metre tower relationship. The revised design improves separation from approximately 15.1–31.5 metres in the original plans to approximately 18.3–34.2 metres. It does not achieve 25 metres at every point. Importantly, however, the minimum condition is localized within an offset relationship rather than a continuous face-to-face tower wall. The new balconies are confined to the second through fourth storeys and therefore do not project into the upper-tower separation condition. The revised plans also remove secondary residential window conditions on the non-primary elevations, reducing additional overlook and privacy relationships at the tighter portions of the building interface. Accordingly, the appropriate urban-design test is whether the revised geometry achieves the underlying privacy, overlook, light, sky-view and visual-separation objectives, rather than treating 12.5 metres as an independently applicable regulatory standard.

Transition should also be considered through the coordinated two-building composition. Dev I is now the lower 21-storey building with an approximately 862-square-metre plate, while the adjacent Dev II proposal is taller at 31 storeys but substantially slimmer at approximately 693 square metres. The resulting 10-storey height difference and materially smaller Dev II plate create a clearer hierarchy and transition between the Wellington Road and High Street components than the more similarly scaled original proposals.

Taken collectively, the reduced height, smaller floor plate, compliant minimum stepback, active base, offset tower relationship and differentiated two-building composition establish a materially more refined

built-form condition than the submitted scheme, even where the City's preferred 1:1.5 aspect ratio, 25-metre separation and 3.0-metre recommended stepback are not achieved as absolute dimensions.

3.2.1 Shadow Study

Goodplace Design's updated Shadow Study for the revised proposal (Sheets A4.0–A4.3) assesses March 21, June 21, September 21 and December 21 at hourly intervals between 9:00 a.m. and 6:00 p.m. The City's Urban Design Brief Terms of Reference identify shadow evaluation criteria as guidelines for design review rather than pass/fail tests. Among other matters, the Terms of Reference seek at least five hours of sunlight on public sidewalks, plazas, parks and school yards on April 21, June 21 and September 21, and seek to avoid more than two consecutive hours of afternoon shadow on residential amenity spaces during spring, summer and fall conditions.

The updated study is considerably more comprehensive than the original Dev I shadow study, which evaluated March 21 at five two-hour intervals. At directly comparable March 21 test times, the revised 21-storey form generally reduces the extent of project-related shadow relative to the original 27-storey submission. The shadow continues to move across the surrounding street and block structure rather than remaining fixed on a single receptor. Midday summer shadow effects are comparatively compact, while longer shadows occur during lower-sun morning, late-afternoon and winter conditions.

With respect to the public-sidewalk guideline, review of the hourly diagrams indicates that project shadow moves from the High Street side of the Site during the morning toward Wellington Road later in the day. Using representative sidewalk segments immediately adjacent to the development and counting only the hourly test positions shown, the June 21 and September 21 diagrams each identify at least five consecutive test hours during which the principal project shadow is clear of each of the four street-side conditions. On Wellington Road, both the west (Site) side and east (opposite) side provide a conservative five-hour sequence from approximately 9:00 a.m. through 1:00 p.m. On High Street, both the east (Site) side and west (opposite) side provide a conservative six-hour sequence from approximately 1:00 p.m. through 6:00 p.m. The diagrams therefore support the intent of the five-hour public-realm sunlight guideline on June 21 and September 21. This is a test-hour accounting based on diagrammatic shadow studies, not a continuous-minute solar-access calculation, and localized background shadow from existing buildings should be distinguished from project-generated shadow.

The at-grade outdoor resident seating/amenity area experiences project shadow during portions of the afternoon and should not be characterized as continuously sunlit. The June 21 and September 21 diagrams nevertheless show sunlight remaining available to portions of the amenity area around the 12:00 p.m. and 1:00 p.m. lunch-period test times. The shadow study does not provide a receptor-area calculation sufficient to establish a precise percentage of the amenity area in sun or shadow at each hour, and an unqualified claim of strict compliance with the Terms of Reference amenity criterion is therefore not warranted. The usability of the development's amenity system should also be considered together with the rooftop outdoor amenity space and lower-level private balconies, which provide alternative outdoor opportunities beyond the at-grade condition.

A separate Goodplace Design As-of-Right Shadow Study (Sheets A4.0–A4.3) confirms that the revised proposal continues to generate incremental shadow beyond the as-of-right condition during certain lower-sun periods. The as-of-right comparison therefore does not establish equivalency; rather, it demonstrates that the revised 21-storey proposal materially improves shadow performance relative to the originally submitted 27-storey built form while continuing to introduce additional shadow associated with the proposed built-form and siting condition. The updated study does not include the April 21 date

identified in the City's Terms of Reference, using March 21 instead. March 21 provides useful lower-sun shoulder-season context but should not be represented as literal April 21 testing. The June 21 and September 21 results provide the direct basis for the public-realm observations above.

3.3 Relationship to 60–68 High Street

The relationship between the subject development and the adjacent 60–68 High Street proposal continues to form an important part of the overall urban-design context.

The two developments are separate applications but continue to be planned comprehensively in relation to internal circulation, shared amenity conditions and built-form relationships. The original Dev II Urban Design Brief similarly recognized the importance of coordinating the two developments in terms of building separation, orientation, circulation and public-realm organization.

The revised proposals establish a more differentiated relationship between the two buildings. The Wellington Road building has been reduced to 21 storeys with an approximately 862-square-metre floor plate, while the adjacent High Street development is proposed at 31 storeys with a materially slimmer approximately 693-square-metre floor plate.

This produces a deliberate transition in both height and plan dimensions: Dev I establishes the lower element on Wellington Road, while Dev II accommodates greater height in a significantly narrower plate toward High Street. This hierarchy is materially clearer than the original proposals, which were comparatively similar in height and overall slab-like proportions.

The revised separation range of approximately 18.3–34.2 metres also improves the relationship between the buildings. Where the separation falls below the City's 25-metre best-practice benchmark, the condition is localized within the offset building geometry rather than extending as a uniform parallel wall condition. This, together with the differentiated heights and plates, maintains visual permeability and sky view through the comprehensively planned two-building condition.

This Addendum does not assess the appropriateness of the revised height of the 60–68 High Street proposal, which is addressed independently through the corresponding Urban Design Brief Addendum for OZ-26079. Rather, the relevant consideration for the subject application is the manner in which the revised 21-storey building relates spatially and compositionally to that adjacent planned condition.

3.4 Public Realm and Pedestrian Circulation

The revised proposal materially strengthens the public-realm strategy established through the original Urban Design Brief and directly responds to the City's current concern that the Wellington Road frontage did not consistently reinforce a transit-supportive, pedestrian-oriented condition.

Wellington Road remains the principal pedestrian-oriented frontage. The main entrance and a new approximately 134-square-metre retail space are located along this frontage, while the first storey provides an approximately 4.25-metre floor-to-floor height. These elements establish active uses, visibility and passive surveillance at the street edge and respond directly to the City's identified OPA/ZBA and Site Plan urban-design directions.

The 1.5 metre fourth-storey stepback and balconies at the second through fourth storeys further moderate perceived height at pedestrian level and introduce occupation and "eyes on the street" above the public sidewalk. Although the stepback is less than the 3.0 metres recommended by Urban Design

staff, it satisfies the 1.5-metre zoning standard and operates together with the substantial six-storey height reduction and active lower building condition.

Continuous accessible pedestrian pathways are provided around all sides of the building, creating a clear connection between Wellington Road, the principal entrance, rear access, bicycle facilities and the High Street side of the comprehensively planned development. This is a functional improvement over the original condition assessed by staff and maintains pedestrian priority despite localized side-yard constraints.

The revised proposal removes the visitor parking component; resident parking was not proposed in either the original or revised concept. Short-term pick-up/drop-off activity is concentrated within seven shared spaces accessed from High Street. Loading and servicing remain necessary components of the building, but their relationship to Wellington Road is secondary to the entrance, retail frontage and pedestrian circulation network.

The revised combination of retail, entrance activity, balcony occupation, base-building articulation and accessible circulation therefore provides a more varied and pedestrian-oriented Wellington Road frontage than the condition described in the City's current comments.

The revised bicycle-parking strategy also reinforces the Site's transit-oriented location. Long- and short-term bicycle spaces are incorporated directly into the development, supporting the lower-car mobility approach contemplated through the original UDB and the Site's relationship to existing and planned higher-order transit.

3.5 Architectural Expression

The revised architectural expression continues to reflect the standardized modular and precast construction methodology underlying the project while providing greater articulation in direct response to the City's built-form comments.

The original Urban Design Brief described a restrained and system-based architectural approach in which façade organization, structural logic and standardized unit planning were closely coordinated. That design methodology remains integral to the project and is directly related to constructability, repeatability and cost control.

The revised elevations introduce greater differentiation at the lower building levels through the fourth-storey setback, balcony portals, active retail frontage and a material palette based on precast limestone- and brick-like expression. These interventions provide depth, shadow lines and pedestrian-scale detail without requiring a fundamentally different structural module.

The upper-floor plans also clarify the privacy condition. Residential unit windows are oriented to the primary east- and west-facing elevations; apparent window-like elements shown on the secondary elevations are architectural façade detailing rather than additional residential vision windows. The revised expression therefore maintains visual articulation without creating unnecessary secondary overlook conditions.

This approach is consistent with a performance-based reading of the City Design policies cited by staff, which contemplate podiums or comparable design solutions rather than requiring a single prescribed podium typology. The revised lower-building articulation provides that comparable function while preserving the standardized building system.

Taken together, the revised architectural treatment provides a clearer base-to-upper-building relationship and greater visual interest while maintaining the efficiency, repetition and construction logic integral to the project's modular delivery and affordability objectives.

3.6 Response to Current Urban Design Directions

For clarity, the following summarizes the principal OPA/ZBA urban-design directions identified in the City's current Comment Tracker and the manner in which the revised Dev I proposal responds. The table distinguishes between matters now achieved, matters materially improved but not fully meeting a staff-preferred benchmark, and matters that remain for detailed approval review.

City Urban Design Direction	Revised Dev I Response	Assessment
Height / scale	21 storeys / approx. 69.5 m, reduced from 27 storeys / 84.0 m; revised height is within the applicable Rapid Transit Corridor / TSA1 height range identified in the planning addendum.	Height-specific concern materially addressed.
Active Wellington Road frontage	Approx. 134 m ² retail, principal entrance, 4.25 m first storey, lower-level balconies and continuous accessible pedestrian connection.	Substantially addressed.
Interior side yard / buffering	1.4–2.0 m north and 1.9–6.9 m south; continuous accessible routes are provided, but the 3.0 m staff-preferred/base-zone dimension is not achieved throughout.	Partially addressed; remains a zoning/site-plan issue.
Stepback above 3rd / 4th storey	1.5 m stepback above the fourth storey. This meets the minimum zoning standard identified by the City; Urban Design recommends 3.0 m.	Minimum zoning standard achieved; 3.0 m recommendation partially addressed.
Slender tower floor plate	Approx. 862 m ² , below the 1,000 m ² staff benchmark and smaller than the approx. 888 m ² original plate that staff already characterized as generally consistent with slender-tower practice.	Floor-plate area benchmark achieved.
1:1.5 tower proportion	Typical upper plate approx. 46.3 m x 18.6 m (approx. 2.5:1). Narrow depth and modular planning reduce breadth, but the geometric 1:1.5 benchmark is not met.	Not achieved as a strict ratio; addressed on a performance basis.
Tower separation	Approx. 18.3–34.2 m, improved from approx. 15.1–31.5 m; sub-25 m condition is localized within offset geometry. Urban Design staff describe 12.5 m tower setbacks as the typical means of preserving 25 m separation; 12.5 m is not an applicable TSA1 zoning setback for the Site.	Improved; 25 m is not achieved throughout, but the underlying privacy, overlook, light and sky-view objectives are addressed on a performance basis.
Outdoor amenity	Approx. 1,106 m ² total amenity / 2.5 m ² per unit, with at-grade resident seating, rooftop outdoor amenity and lower-level balconies.	Materially improved; detailed amenity/landscape review remains.
Shadow / sunlight	Four-season hourly study plus as-of-right comparison; revised 21-storey form improves shadow relative to original at comparable times. On June 21 and September 21, representative segments on both sides of Wellington Road provide a conservative 9:00 a.m.–1:00 p.m. sequence outside the principal project shadow, while both sides of High Street provide approximately 1:00 p.m.–6:00 p.m. at the hourly test resolution. Incremental as-of-right shadow remains.	Materially improved and appropriately qualified; public-sidewalk test-hour sequences satisfy the five-hour intent on June 21 and September 21, while April 21 is not directly tested.

The revised proposal therefore does not rely on a claim that every staff-preferred numerical benchmark has been met. Rather, it demonstrates that the principal urban-design concerns identified through review have been materially addressed through an integrated package of height reduction, smaller floor plate,

active frontage, accessible circulation, additional amenity, compliant minimum setback, improved tower separation and updated shadow performance.

4.0 Conclusion

The revised proposal maintains the fundamental urban-design framework established through the original Urban Design Brief while introducing substantive refinements that directly respond to the City's current concerns regarding site organization, built-form scale, public-realm activation, amenity, tower relationships and shadow.

In particular, the reduction from 27 to 21 storeys, approximately 29% reduction in gross floor area, smaller approximately 862-square-metre floor plate, revised siting, 1.5-metre fourth-storey setback, improved accessible pedestrian circulation, expanded amenity strategy and introduction of ground-floor retail along Wellington Road collectively result in a materially reduced and more articulated built form.

The revisions strengthen Wellington Road as the primary pedestrian and public-realm frontage, provide a more functional internal amenity system, and establish a clearer transition to the adjacent 60–68 High Street development. The coordinated relationship now comprises a lower 21-storey Dev I building and a taller but substantially slimmer 31-storey Dev II building, with separation ranging from approximately 18.3 to 34.2 metres.

The updated shadow analysis confirms improved performance relative to the original 27-storey submission at directly comparable test times and provides a more comprehensive four-season assessment. At the hourly resolution provided, the June 21 and September 21 diagrams identify at least five consecutive test hours outside the principal project shadow on representative segments of both sides of Wellington Road and both sides of High Street, while the at-grade outdoor resident seating/amenity area remains subject to partial afternoon shadow and the proposal continues to generate incremental shadow beyond the as-of-right condition. These effects are appropriately understood as design-review considerations rather than pass/fail criteria under the City's Terms of Reference.

The revised proposal does not achieve every Urban Design staff-preferred dimensional benchmark – notably the 1:1.5 tower proportion, 25-metre separation at every point and 3.0-metre recommended setback. Those matters are addressed through a performance-based combination of a sub-1,000-square-metre floor plate, shallow tower depth, reduced overall height, localized offset separation, compliant minimum setback, active lower-building articulation and the modular construction methodology supporting the project's affordability objectives.

Accordingly, the urban-design conclusions of the original Urban Design Brief remain applicable and are strengthened by the August 2026 revisions. In our opinion, the revised proposal provides a materially improved and defensible urban-design response to the principal issues identified through the City's review, subject to continued resolution of detailed zoning, road-widening, landscape and site-plan matters through the approval process.



Sincerely,

A handwritten signature in black ink, appearing to read "B. Scorgie", enclosed within a light gray rectangular border.

Blair Scorgie

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