
PLANNING JUSTIFICATION REPORT

IN SUPPORT OF

**OFFICIAL PLAN AMENDMENT &
ZONING BY-LAW AMENDMENT
APPLICATIONS**

PREPARED FOR

Foundation Capital Development Fund I LP

**57-75 Wellington Street & 68 High Street
City of London**

May 2026
GSAI File: 1707-001

*Planning Justification Report - 57-75 Wellington Road & 68 High Street
Glen Schnarr & Associates Inc.*

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**Planning Justification Report
Foundation Capital Development Fund I LP
Official Plan Amendment & Zoning By-law Amendment
57-75 Wellington Road & 68 High Street
City of London**

1.0 INTRODUCTION

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

- 57 Wellington Road, *Part Lot 25, Concession Broken Front, Part 1, 33R2852 Except Part 6 On 33R9660 And Part 3, 33R21870; T/W Ease Over PT 2 PL 33R-16001 As In ER341297 Subject To An Easement In Gross Over Part 4, 33R21870 As In ER1603968 City of London*
- 63 Wellington Road; *Part Lot 25, Concession Broken Front, As In Istly Of 729535 Except Part 5, 33R21870; S/T Ease Over PT 2 PL 33R-16001 As In ER341297 (Partial Release As In ER1603978) Subject To An Easement In Gross Over Part 6, 33R21870 As In ER1603976 City of London;*
- 75 Wellington Road; *Part Lot 9, Plan 33(4TH) As In 862829, Save & Except Part 7 Plan 33R21870 Subject To An Easement In Gross Over Part 8 Plan 33R21870 As In ER1594194 City of 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 west of Wellington Road, east of High Street, and south of Grand Avenue, in the City of London. The Subject Lands are approximately 0.2 hectares (0.52 acres) in total area and currently occupied by two three-storey apartment buildings and two 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 an Official Plan Amendment and a Zoning By-law Amendment (the ‘Amendments’) application to facilitate redevelopment of the Subject Lands. The redevelopment will consist of a high density affordable apartment building fronting Wellington Road and vehicle access from 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.

The Proposed Development represents an affordable residential development on an underutilized site adjacent to significant transportation infrastructure.

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 April 16, 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 west side of Wellington Road, east of High Street, and south of Grand Street within Ward 11 in the City of London. The Subject Lands consists of four assembled parcels (57, 63, 75 Wellington Road and 68 High Street) with 0.2 hectares (0.52 acres) in total area, resulting in an irregular shape and varying lot depths. The Subject Lands currently consist of two three-storey apartment buildings and two single detached structures. Approximately 54.5 metres of frontage is provided along Wellington Road and 13.2 metres along High Street, including one existing driveway access at 75 Wellington Road and one existing driveway access on High Street.



FIGURE

1

AERIAL CONTEXT PLAN

CITY OF LONDON

LEGEND

Subject Lands

57 - 75 WELLINGTON STREET &
68 HIGH STREET
CITY OF LONDON
MIDDLESEX COUNTY



SCALE NTS
APRIL 24, 2026

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3.1 AREA CONTEXT

On an irregular block formed by the fork of High Street and Wellington Street, the Subject Lands abut existing commercial uses to the north and south, and existing residential uses to the west, as well as a vacant site to the northwest. Three residential properties immediately west and abutting the Subject Lands (60, 62, 64 High Street) are currently in early planning stages for a future redevelopment on behalf of the Applicant. To the east of Wellington Road are existing residential uses and a recreational park. As shown on **Figure 1**, adjacent residential uses on the east side of Wellington Road were recently demolished through the City's road widening and ongoing construction of the Wellington Road Rapid Transit Corridor. As a result, the Subject Lands are relatively separated from immediate residential uses. The residential built form in the 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** The City is currently undertaking a road widening and constructing rapid transit infrastructure on Wellington Road to the 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.

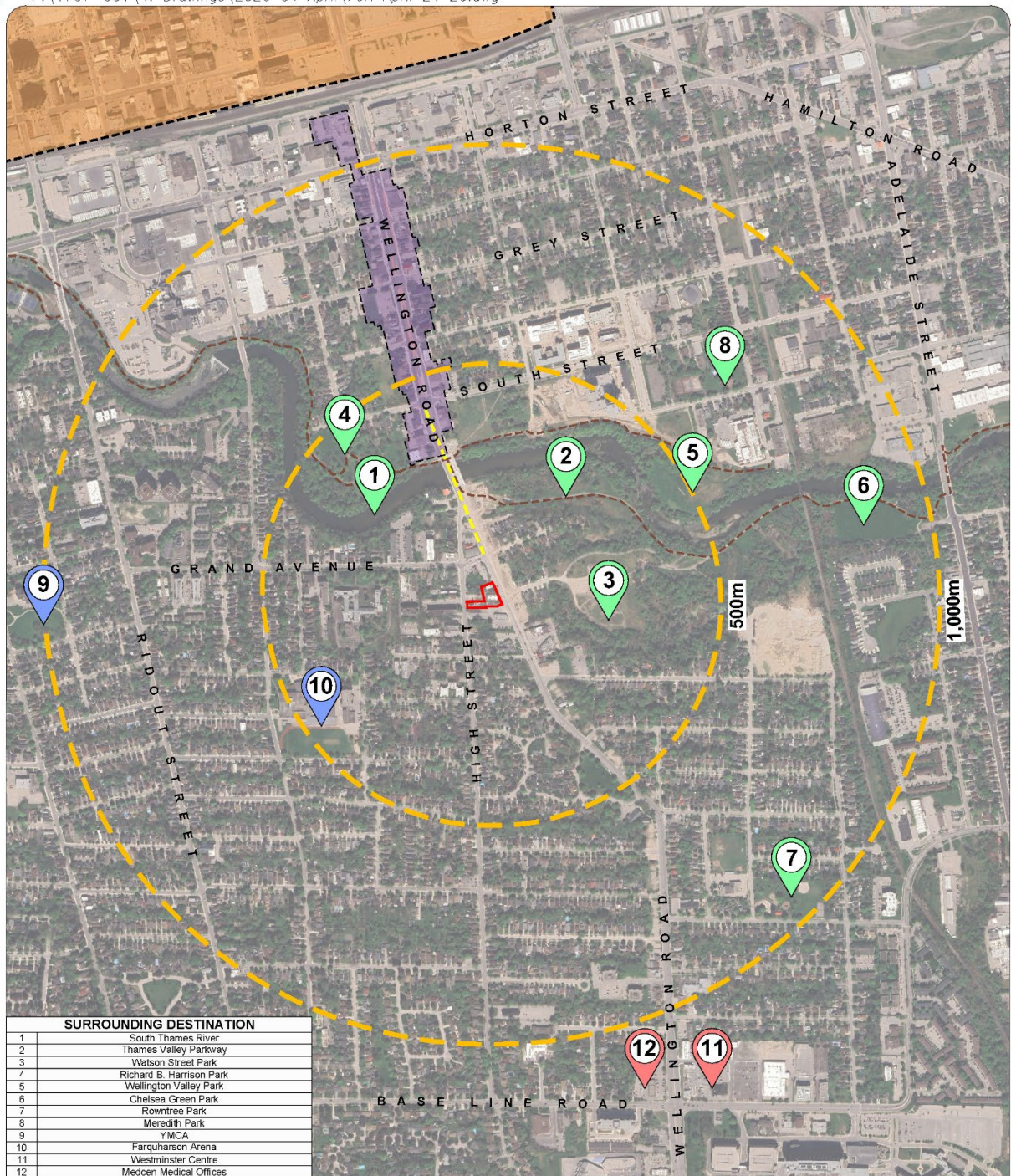


FIGURE
2

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

57 - 75 WELLINGTON STREET &
68 HIGH STREET
CITY OF LONDON
MIDDLESEX COUNTY

- Parks & Open Spaces
- Institutional Uses
- Commercial Use



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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 recreational trails. Multiple existing routes offer frequent service along Wellington Road, including connection to Downtown London, and there are transit stops immediately accessible to the Subject Lands at Wellington Road and Grant 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 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 further 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 Wellington Road, identified as a Rapid Transit Boulevard, and will have vehicle access from High Street, identified as a Neighbourhood Connector. 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, and the Thames Valley Parkway providing 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 across the reconstructed Clark’s Bridge to the north, which will provide direct bike connection from the Subject Lands towards Downtown London.

The City of London is currently undertaking a road widening of Wellington Road as part of the ‘Wellington Gateway’ project. A road dedication is required from the east side of the Subject Lands to accommodate the City’s road enhancements. As discussed in the Transportation Impact Assessment (MD Urban Traffic Solutions Ltd., May 2026) detailed in Section 5.3 of this Report, the Wellington Gateway BRT project is now substantially constructed in the area in front of the Subject Lands at a right-of-way width of approximately 35-40 metres. Per the TIA, there is no evident need for additional widening to implement the final Wellington Road design.

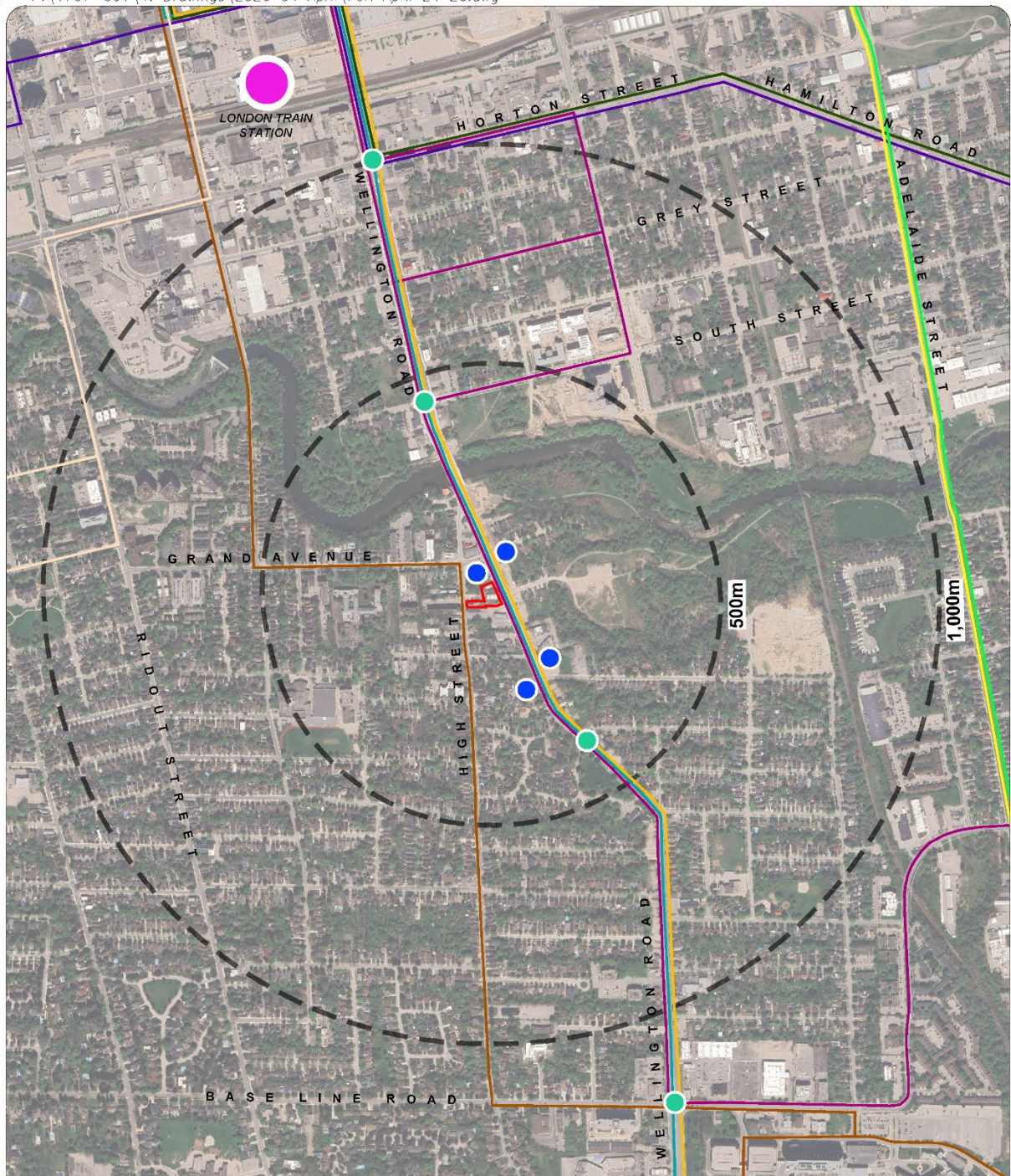


FIGURE
3

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 |

57 - 75 WELLINGTON STREET &
68 HIGH STREET
CITY OF LONDON
MIDDLESEX COUNTY



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4.0 PROPOSED DEVELOPMENT

The Proposed Development is a high density infill redevelopment consisting of a 27-storey (84 metres) purpose-built rental apartment. The apartment is be massed and oriented towards Wellington Road, with primary pedestrian access at Wellington Road and vehicle access in the rear from High Street. A total of 572 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 affordable rents. 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 ¹	AVERAGE MARKET RENT ²	AVERAGE MARKET RENT ³
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

The apartment building is 27-storeys, 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 the Wellington Road streetscape. 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 22 residential units, including 14 studio, 5 one-bedroom, and 3 two-bedroom. The apartment building is planned to be constructed as a pre-cast concrete

¹ Provincial Bulletin

² Provincial Bulletin

³ CMHC

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 305 square metres of amenity space on the ground floor and rooftop, as well as 561 square metres of outdoor amenity space, for a total provision of approximately 866 square metres (1.5 square metres per resident). These community spaces are supplemented by multiple open space and recreation uses within 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. Twelve visitor parking spaces are provided in one level of underground parking. 258 total bicycle parking spaces are provided, including 70 short term spaces at ground level and 190 long term spaces at ground level and the underground parking level. The ground floor provides direct pedestrian access to the future enhanced Wellington Road streetscape, including existing public transit stops within 50 metres, and future rapid transit public stations within 400 metres. Pedestrian walkways are proposed along the north and south sides of the Proposed Development, facilitating continuous pedestrian movement between Wellington Street and High Street, as well as through the ground floor of the building.

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	2097 m ² (0.20 ha; 0.51 ac)
Building Footprint	932 m ² (10,033 ft ²)
Gross Floor Area	23,417 m ² (252,063 ft ²)
Floor Space Index	11.17
Total Units	572
Unit Mix	364 Studio; 130 One-bedroom; 78 Two-bedroom
Density (UPH)	2,727
Height	27 Storeys (84 m)
Visitor Parking	12 Spaces (including 1 accessible)
Short-Term Bicycle Parking	70 Spaces (0.1 per unit)
Long-Term Bicycle Parking	190 Spaces (0.33 per unit)
Loading Spaces	2
Amenity Space	866 m ² (9,329 ft ²) (1.5 m ² per unit)

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

4.1 PROPOSED OFFICIAL PLAN AMENDMENT

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

The proposed OPA seeks to amend the Rapid Transit Corridor land use permissions to permit a maximum height of 27 storeys, where the London Plan permits a maximum height of 25 storeys. The OPA acknowledges that floor to ceiling heights for apartment buildings are typically 3 metres, and as such restricting the height of apartment buildings to twenty five storeys would not optimize permitted height allowance in the Zoning By-law (82 metres), nor the most efficient use of the Subject Lands. A detailed review of Official Plan policy and rationale for the proposed OPA is provided below in Section 6.0 of this Report. The proposed OPA is provided in **Appendix II**.

4.2 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:

- Identify Wellington Road as the front lot line
- Permit an interior yard depth of 1.1 metres
- Permit a rear yard depth of 4.35 metres
- Permit a height of 84 metres
- Permit a floor area ratio of 11.17
- Permit an amenity area rate of 1.5 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 0.33 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 a Zoning By-law table and rationale for the proposed amendments. The proposed ZBA 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, May 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.

5.2 TREE PRESERVATION PLAN

A Tree Preservation Plan (TPP) was prepared in support of the Proposed Development (Dan Weagant, April 2026). Per the TPP, 29 trees are identified on the Subject Lands and 26 trees are required to be removed to facilitate the Proposed Development. Where warranted and advisable, efforts are made to preserve and protect trees in situ.

5.3 TRANSPORTATION IMPACT ASSESSMENT

A Transportation Impact Assessment (TIA) was prepared in support of the Proposed Development (MDT Urban Traffic Solutions Ltd., May 2026). Per the TIA, study area intersections are operating with acceptable 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 2034 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 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.

The TIA further provides a discussion of the Wellington Road right-of-way requirement, as City of London staff previously suggested that a 25 metre widening from centreline was required for the section of Wellington Road in front of the Subject Lands. As discussed in the TIA, staff's estimated road widening is not a technical requirement of the Wellington Gateway BRT project, which is now substantially constructed in the area in front of the Subject Lands. The implemented design for Wellington Road at the Subject Lands is a total approximate right-of-way width of 35-40 metres, which includes all required elements for the full corridor, including traffic lanes, BRT infrastructure, boulevards, and sidewalks. Per the TIA, there is no evident need for additional widening.

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., May 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 SFS 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% 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. These rents would represent approximately 30% of before-tax income for households making up to and around \$60,000. The 572 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, which is supportable given the high accessibility of public transit in the area.

The residential density of the Proposed Development is 2,726 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, 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 MTSAs. 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 572 units or an approximate population of 828, per the density assumptions within the City of London “2021 Development Charges Background Study”.⁴ 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 preparing for the impacts of a changing climate. 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. 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 prepared in support of the Proposed Development (Strik, Baldinelli, Moniz Ltd., May 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.

⁴ High Density Apartment 1-bedroom: **1.38** persons per unit; High Density Apartment 2-bedroom: **1.87** persons per unit

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 affordable housing 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 in December 2016. As of May 2022, the Official Plan is in full force and effect as all policy appeals have been resolved through 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 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 MTSA). Rapid Transit MTSAs are identified due to their proximity to rapid transit stations.



FIGURE 4

LONDON OFFICIAL PLAN

MAP 1 - PLACE TYPES

LEGEND

 Subject Lands

57 - 75 WELLINGTON STREET &
68 HIGH STREET
CITY OF LONDON
MIDDLESEX COUNTY



SCALE NTS
APRIL 24, 2026

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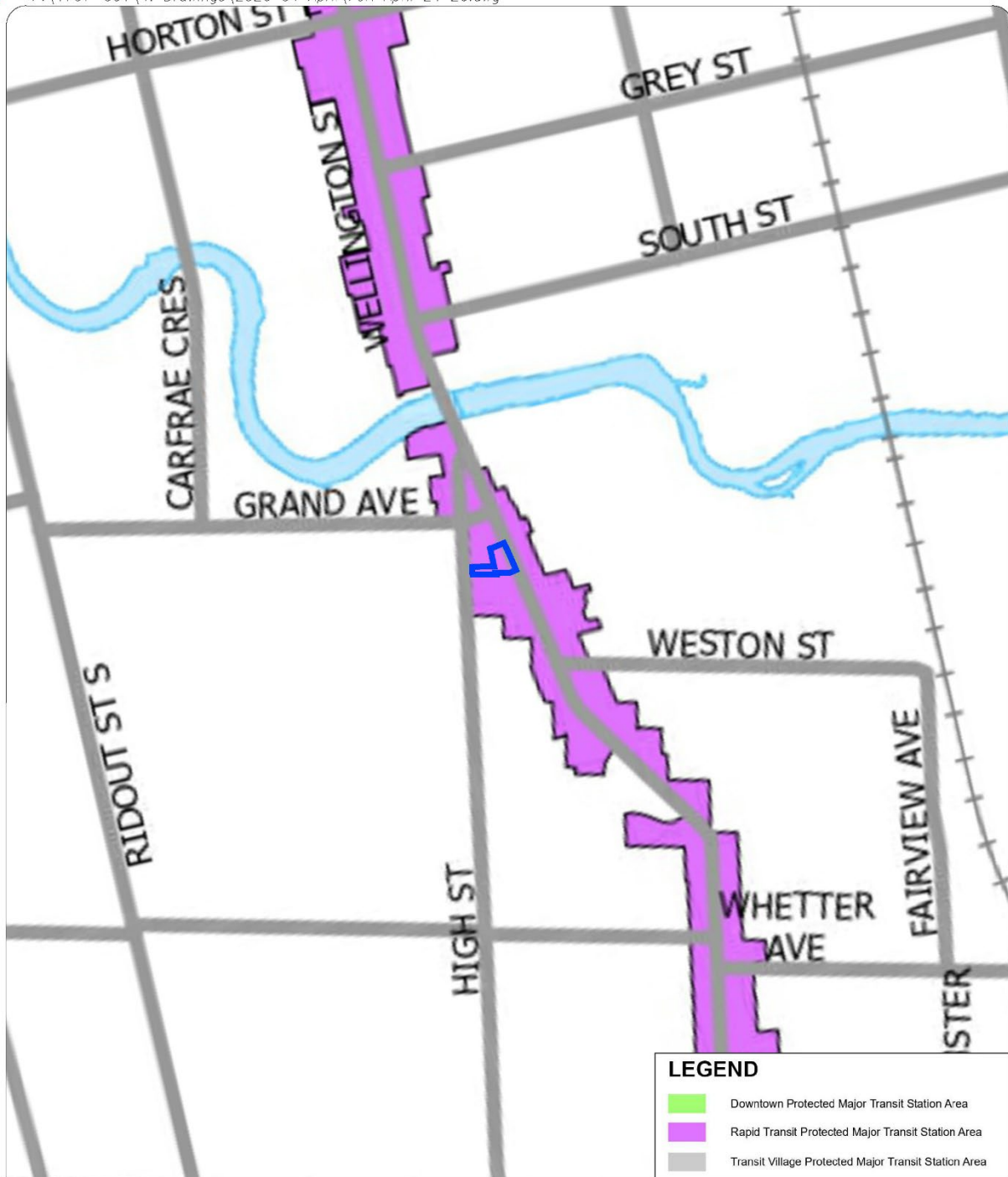


FIGURE
5

LONDON OFFICIAL PLAN

MAP 10 - PROJECTED MAJOR TRANSIT STATION AREAS

LEGEND

 **Subject Lands**

57 - 75 WELLINGTON STREET &
68 HIGH STREET
CITY OF LONDON
MIDDLESEX COUNTY



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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 2011⁵, and an estimated 115,000 people will live and 84,000 people will work within a 10 minute walk of proposed rapid transit lines⁶. 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 below:

- 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.”*

⁵ Official Plan, page 6 (“Did You Know”)

⁶ 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 (96_).

The Proposed Development meets the policy direction for intensification within these areas, providing 572 units in a high-rise apartment building along the Wellington Road rapid transit corridor. The Proposed Development does not provide vehicle parking or vehicle access to Wellington Road and intends to 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 for residents. 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 50 metres to the north, and future rapid transit stations will be located within 400 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, May 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.

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 1.1 metres, within the permitted range of the City of London Zoning By-law, and appropriate for the Wellington Road 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.”* All vehicle access, including loading, garbage, and servicing is proposed to the rear of the Proposed Development via 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 Wellington Street, with minimal setback as noted. Resident amenity space is provided on the ground floor and the principal pedestrian entrance will be connected to the public realm and planned future enhancements pedestrian infrastructure along Wellington Road. A continuous pedestrian connection is provided through the ground floor and exterior walkways of the proposed apartment to provide greater connection to public sidewalks on High Street and Wellington Road.

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/visitor drop-off & pickup area is provided at the rear of the proposed apartment building, and 12 visitor parking spaces are provided to facilitate vehicle accessibility. 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 70 short-term bicycle parking spaces at the ground level, and 190 long-term bicycle parking spaces across the ground level and one level of underground. Bicycle parking rates of 0.33 long-term spaces and 0.1 short-term spaces per residential unit are proposed. An amendment is required to facilitate the 0.33 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, May 2026), submitted separately to this Report. However, again from a land use perspective, the proposed 27-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. Impacts to adjacent properties are anticipated to be minimal as the abutting properties to north and south are commercial, the abutting properties to the west are in early planning stages for a future redevelopment by the Applicant, and Wellington Road is being widened – separating the Subject Lands from the east neighbouring properties. Transition to surrounding properties is provided through relative massing and orientation of the building along Wellington Corridor and away from High Street, with adequate setbacks to adjacent sites.

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 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 Collectors are prioritized for pedestrians, move low to medium volumes of cycle/transit/vehicles, and have a planned street width of 23 metres. Rapid Transit Boulevards prioritize through movement, move high volumes of traffic across multiple modes, and have a planned street width of 50 metres. As further identified in the "Complete Streets Design Manual", 50 metres is the "*preferred*" width for Rapid Transit Corridors (section 4.2, page 84).

As discussed with City staff, the planned street width of 50 metres for Wellington Road would potentially require a widening of 25 metres from centreline to facilitate the ultimate Rapid Transit Corridor. This would require an approximate road dedication of between 8.7 and 9.3 metres on the Subject Lands. The request and planned intent is understood, as this ultimate width could accommodate multiple transportation modes and urban design features. However, we also acknowledge and understand that the Official Plan is a set of policies and is intended to be read as a whole. Refer to policy 36_, which states that "*The London Plan is more than a set of individual policies – no policy stands on its own. The Plan is to be read in its entirety and the relevant policies are to be applied to each situation.*"

Where there are competing objectives, including between urban design and the provision of affordable housing, those competing objectives need to be reconciled. We suggest that the potential widening of 25 metres from centreline over the Subject Lands is unnecessary for the planned intention of Wellington Road, and would further conflict with the potential to provide a high density affordable housing development. Affordable housing is highly emphasized as a priority within the Official Plan and should be a priority objective in this context.

As stated in policy 372B_, the Official Plan contains policies for alternative street widths from the standards identified above through policy 371_ (see policy 1739A_). Policy 1739A_ of the Official Plan states that alternate street widths may be provided without the need for an Official Plan amendment, provided certain criteria is met. Criteria includes:

- *“Widening would have an adverse impact on an established street wall, streetscape character, parcel viability, or the ability to maintain consistent setbacks for new development, which applies where there is a policy basis to maintain and enhance existing street character;”*
- *“Council is of the opinion that other constraints make it impractical to widen the street to the planned width...”*

The planned width of 50 metres could have an adverse impact on the provision of affordable housing on the Subject Lands. Should a widening of 25 metres be taken from centreline, resulting in a dedication of approximately 8.7 to 9.5 metres, the viability of the Subject Lands to support high density development along a Rapid Transit Corridor would be reduced. A similar reduction in viability for future intensification is estimated for many of the east parcels on the block between Grand Avenue and McClary Avenue. We further note that any widening in this location would impact the abutting LCBO property to the south. As the LCBO is a Provincial entity outside of Municipal jurisdiction and is not anticipating any redevelopment, it may be impractical to accommodate a 25 metre widening in this location given this constraint.

As discussed in the Transportation Impact Assessment (MD Urban Traffic Solutions Ltd., May 2026) detailed in Section 5.3 of this Report, the Wellington Gateway BRT project is now substantially constructed in the area in front of the Subject Lands at a right-of-way width of approximately 35-40 metres. Per the TIA, there is no evident need for additional widening to implement the final Wellington Road design.





FIGURE
7

LONDON OFFICIAL PLAN
MAP 4 - ACTIVE MOBILITY NETWORK

LEGEND

 Subject Lands

57 - 75 WELLINGTON STREET &
68 HIGH STREET
CITY OF LONDON
MIDDLESEX COUNTY



SCALE NTS
APRIL 24, 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., May 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 57 units) affordable housing (as defined in *Table 1* of this Report). The remaining units will be provided at or near the City’s average market rent to facilitate housing units for low to middle income households, including students and seniors. The proposed units are generally designed for renters who make up to and around \$60,000 annually, 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”*⁷.

As discussed in both the June 2025 and April 2025 City of London staff reports above, there is a critical need for affordable 1-2 bedroom units in the City. The Proposed Development provides 572 units and is a private development initiative to help meet this need as it targets 10% affordability and a unit mix of 364 studio/bachelor (64%), 130 one-bedroom (23%), and 78 two-bedroom (13%).

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.”*** To facilitate the Proposed Development, an Official Plan Amendment is required to achieve a building height of 27-storeys. This is a two-storey, or 8% increase, from the permitted 25-storeys in the Rapid Transit Corridor Place Type. This increase is considered appropriate as it maintains the intent of high density intensification along the Rapid Transit Corridor and provides for an affordable housing development.

GREEN AND HEALTHY CITY

The Official Plan outlines policy regarding *“green and healthy”* development, including environmental and human health considerations. 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

⁷ Official Plan, page 6, (*“Did You Know”*)

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 of a 32.5% mode share for walking, cycling, and transit by 2050⁸ 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 within its Place Type framework for the urban area. As noted, the Subject Lands are within the Rapid Transit Corridor Place Type, and further identified as a Protected Major Transit Station Area (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 as-of-right 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 in close proximity to transit stations (policy 827_).

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). 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_, the following intensity policies apply within the Rapid Transit Corridor Place Type:

840_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.

As discussed above in Section 3.1 of this Report (Area Context), the Subject Lands have limited interface with adjacent residential uses and the Proposed Development is compatible with the surrounding planned area. The proposed apartment building is massed to the east of the site, towards the widened Wellington Road, and away from abutting residential uses to the west. Those abutting uses are additionally in early planning stages for redevelopment by the applicant. The north and south borders are abutted by existing standalone commercial sites.

⁸ City of London, “Mobility Master Plan”, July 2025

Reduced yard setbacks are required to facilitate the Proposed Development, however the proposed setbacks remain sufficient for compatibility to neighbouring uses. Refer to Section 6.3 of this Report below for further discussion of the proposed setbacks.

840_2: *Commercial buildings should not exceed 6,000m² in size within Corridors.*

The Proposed Development does not propose a commercial use.

840_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*

The Proposed Development is planned for 572 units or an approximate population of 828, per the density assumptions within the City of London “2021 Development Charges Background Study”.⁹ Across a 0.2 hectare site, this results in approximately 2,727 residents per hectare, which meets and exceeds the Official Plan minimum for a Rapid Transit Corridor.

840_4: *Within the Rapid Transit Corridor Place Type and 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.*

The Proposed Development achieves a residential density of approximately 2,727 units per hectare, which meets and exceeds the Official Plan minimum for a Rapid Transit Corridor.

840_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.*

The Proposed Development represents a lot assembly of four parcels to facilitate a comprehensive redevelopment. Only one vehicle access is proposed to High Street and no vehicle access is proposed to Wellington Road. No fragmented or isolated remnant lots are created on the surrounding block through the proposed lot assembly and Proposed Development.

840_6 *Lots will be of sufficient size and configuration to accommodate the proposed development and to help mitigate planning impacts on adjacent uses.*

The proposed high density apartment building can be accommodated on the Subject Lands without adverse impact to adjacent uses.

840_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. An aggregate total of no more than 5,000m² will be allowed within 150 metres of a rapid transit station.*

⁹ High Density Apartment 1-bedroom: **1.38** persons per unit; High Density Apartment 2-bedroom: **1.87** persons per unit

The Proposed Development does not propose office space.

840_8: *The Zoning By-law will include regulations to ensure that the intensity of development is appropriate for individual sites.*

Refer to Section 6.3 of this Report for a discussion of the proposed implementing Zoning By-law Amendment.

840_9: *The full extent of intensity described above will not necessarily be permitted on all sites within the Rapid Transit and Urban Corridor Place Types.*

The Proposed Development facilitates affordable and purpose-built rental units within an area highly serviced by public transit, meets the intent of the Rapid Transit Corridor Place Type, and is appropriate for the Subject Lands.

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, May 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 proposed increase in height is supportable per policy 521_ of the Official Plan, which accommodates for the provision of affordable housing. Further, the proposed height remains functional, compared to the permitted 25-storey height, with no adverse impact anticipated from the 2-storey increase. Two additional storeys facilitates the majority of the proposed affordable units, providing an additional 44 affordable units and continues to fully utilize the existing and planned infrastructure in the area.

Per policy 1638_ and 1639_ of the Official Plan, applications for heights exceeding the maximum of the applicable Place Type will require an Official Plan amendment and the creation of a new specific area policy, as well as a site-specific Zoning By-law amendment. The proposed implementing amendments are outlined in Section 4.1 and 4.2 above in this Report and attached as Appendix II and Appendix III. Policy 1641_ states: “*Applications to increase the maximum building height may be permitted where the resulting intensity and form of the proposed development represents good planning within its context.*” As discussed above, the Proposed Development represents good planning within the surrounding context and planned City structure.

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 better 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 (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 Street. 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** on the next page, 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

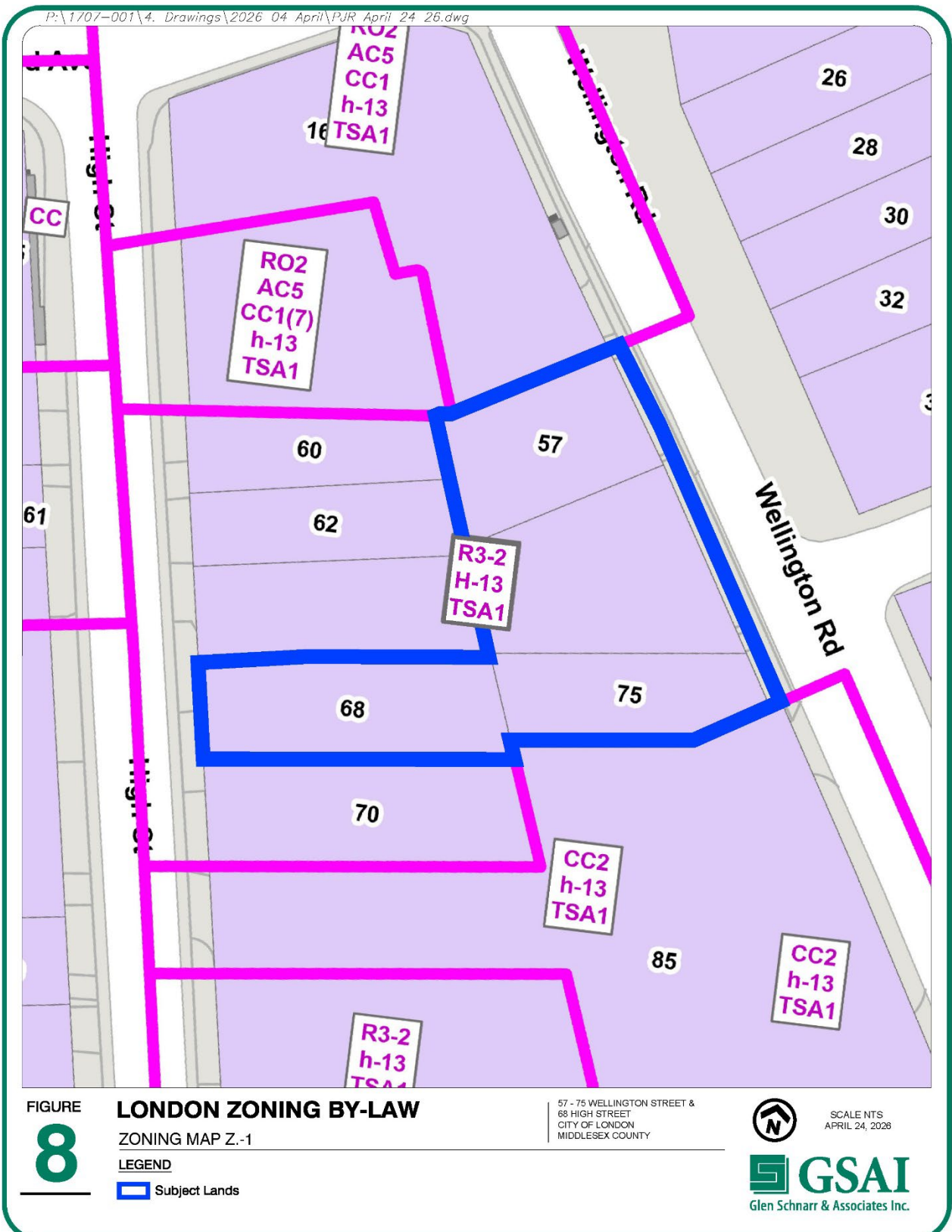
Applicable Zone (per 3.9(1)(i))	Regulation	Permitted	Proposed
TSA1	Permitted Use	Apartment Building	Apartment Building
R3-2	Lot Area (min)	360m ²	2097m ²
TSA1	Lot Frontage (min)	30m	54.5m
TSA1	Front Yard Depth (min-max)	1.0m-3.0m	1.1m
TSA1	Exterior Yard Depth	N/A	N/A
TSA1	Interior Yard Depth (min)	3.0m	1.4m
TSA1	Rear Yard Depth Abutting a Residential Zone (min)	15m	4.35m
TSA1	Landscaped Open Space (min)	10%	10%
TSA1	Lot Coverage (max)	80%	44%
TSA1	First Storey Height (min)	4.0m	4.25m
TSA1	Height (min-max)	8.0m-82.0m	84.0m
TSA1	Residential Density (min)	45 UPH	2727 UPH
TSA1	Floor Area Ratio (max)	6.5	11.17
TSA1	Gross Floor Area Office (max)	5,000m ²	0 m ²
TSA1	Amenity Area (min)	6.0m ² per residential unit	1.5m² 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	12
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	0.1 spaces per unit
General Provisions	Parking (Long-Term Bicycle) (min)	0.9 spaces per unit	0.33 spaces per unit

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. As the abutting sites are commercial, limited impact is anticipated. The proposed 1.4 metre separation represents a pinch point in the south corner due to irregular lot shape. A 3.0 metre or greater side yard setback is otherwise provided, which will facilitate pedestrian walkways along the north and south of the building and short-term bike storage and resident seating area along the south side. Sufficient setback is provided in the east interior yard to provide soil volume and drainage for plantings and canopy.
Rear Yard Depth Abutting a Residential Zone	To implement the desired built form, while maintaining appropriate compatibility and transition to the abutting sites. The proposed 4.35 metre separation represents a pinch point in the northwest corner due to the lot configuration along Wellington Road. The rear yard depth otherwise ranges from 4.3 to 12.5 metres, which will facilitate sufficient space for vehicle access and short-term bicycle storage. This separation is considered compatible to existing planned context in the rear considering the range of setback, limited impacted properties, limited vehicle movement, and resident amenity spaces located away from the rear yard. Additionally, the three residential properties immediately west and abutting the rear yard of the Subject Lands (60, 62, 64 High Street) are currently in early planning stages for a future redevelopment on behalf of the Applicant. The intent is a comprehensive redevelopment with the neighbouring properties and Subject Lands for a similar residential built form built and intensity.
Height	To implement the desired built form and provide additional affordable housing units. The proposed amendment to 84 metres represents a 2 metre increase (2.4%) from the permitted height of 82 metres. This increase is minor, with minimal impact to the surrounding area compared to the as-of-right permission, and facilitates an additional storey of 22 affordable units.
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, of which the abutting properties are primarily non-residential.

Amenity Area	To implement the desired built form and provide affordable housing units. The practical design of the apartment and a reduction of amenity area facilitates the affordability of purpose-built rental units. In the surrounding context, there are multiple walkable public and private amenities, including Watson Street Park on the east side of Wellington Road and the Thames Valley Corridor to the north. Given the sufficient area public amenity, the proposed amenity rate is considered appropriate for a design than 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 units. To accommodate the pre-cast construction method, a practical design is required that eliminates the requirement for a step back on the apartment. Other 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, April 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 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. 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 units. There is no resident parking requirement for the Proposed Development and no resident parking spaces are required. However, 12 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.



7.0 SUMMARY & CONCLUSION

As outlined above, the Proposed Development and corresponding Draft Official Plan Amendment and Draft Zoning By-law 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 Amendments represent 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 Amendments are consistent with the Provincial Planning Statement and have 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 proposal 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,
11. The proposal 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, FENCES, SET BACK, EASEMENTS AND BY-LAWS PRIOR TO ANY CONSTRUCTION. DRAINAGE SHALL CONFORM TO APPROVED ENGINEERING SUBMISSION GRADES. STRUCTURAL, MECHANICAL AND ELECTRICAL DRAWING SHALL BE REFERRED TO WHERE REQUIRED. CONTRACTOR MUST COMPLY WITH ALL PERTINENT CODES AND BY-LAWS. THIS DRAWING MAY NOT BE USED FOR CONSTRUCTION UNLESS AUTHORIZED BY THE DESIGNER. NO PORTION OF THIS DRAWING IS THE EXCLUSIVE PROPERTY OF GOODPLACE DESIGN AND SHALL NOT BE USED WITHOUT CONSENT.

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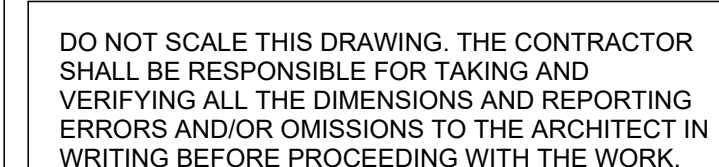
LOCATION: 57-75 WELLINGTON RD
LONDON, ONTARIO

SITE PLAN & STATISTICS

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A1.0

SCALE 1 : 150



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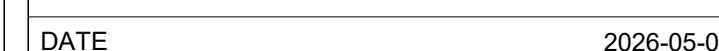
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CLIENT: FOUNDATION CAPITAL C/O MICHAEL NEMANIC

LOCATION: 57-75 WELLINGTON RD
LONDON, ONTARIO

P1 FLOOR PLAN

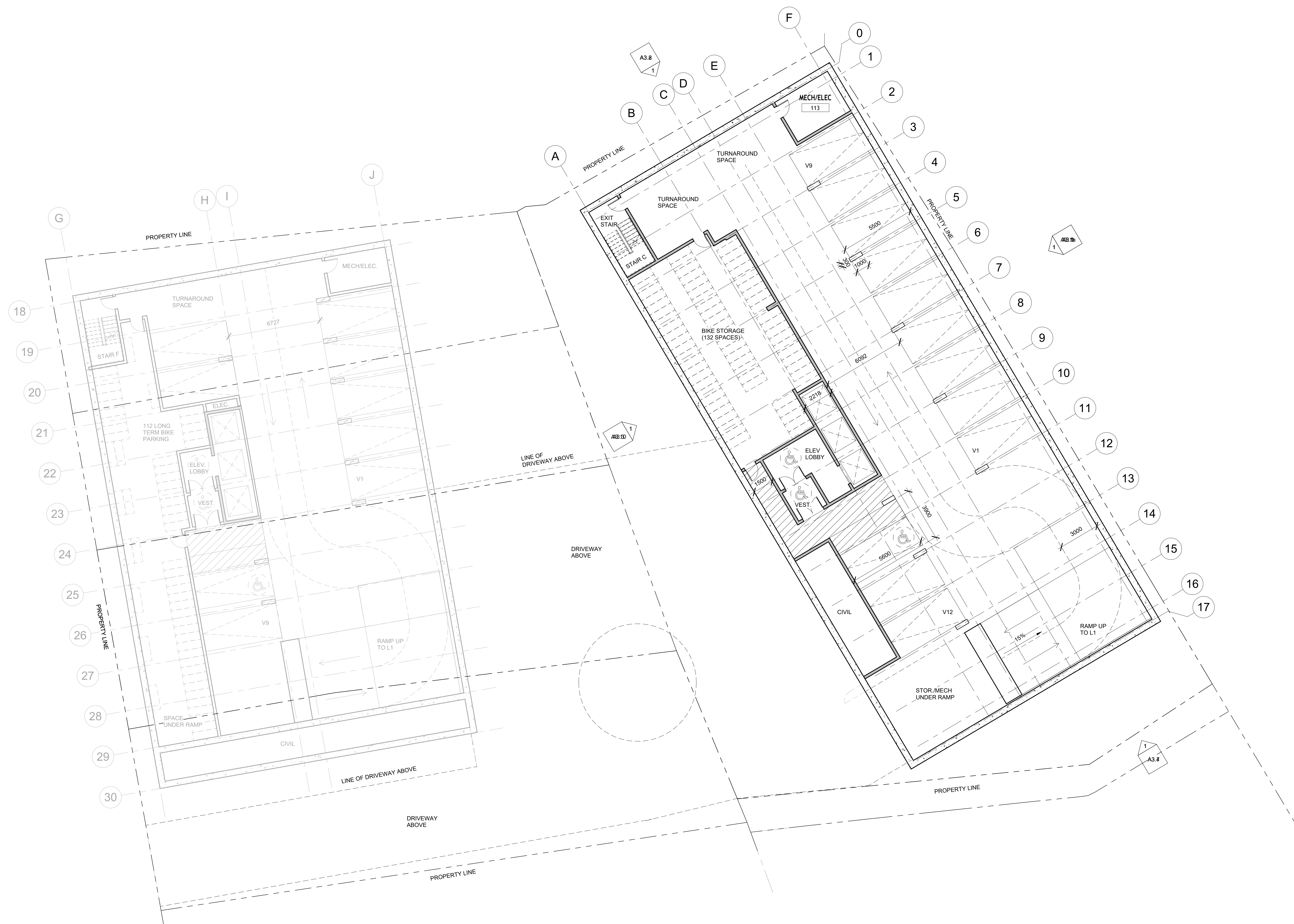
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TORONTO, ON
M6P 3V6



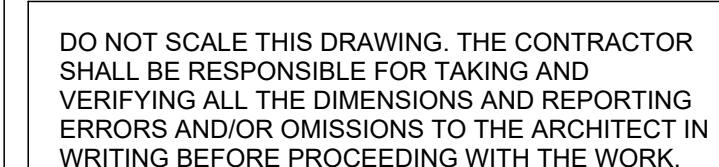
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SCALE	1 : 12
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① P1 FLOOR PLAN
1 : 125



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LOCATION: 57-75 WELLINGTON RD
LONDON, ONTARIO

L1 FLOOR PLAN

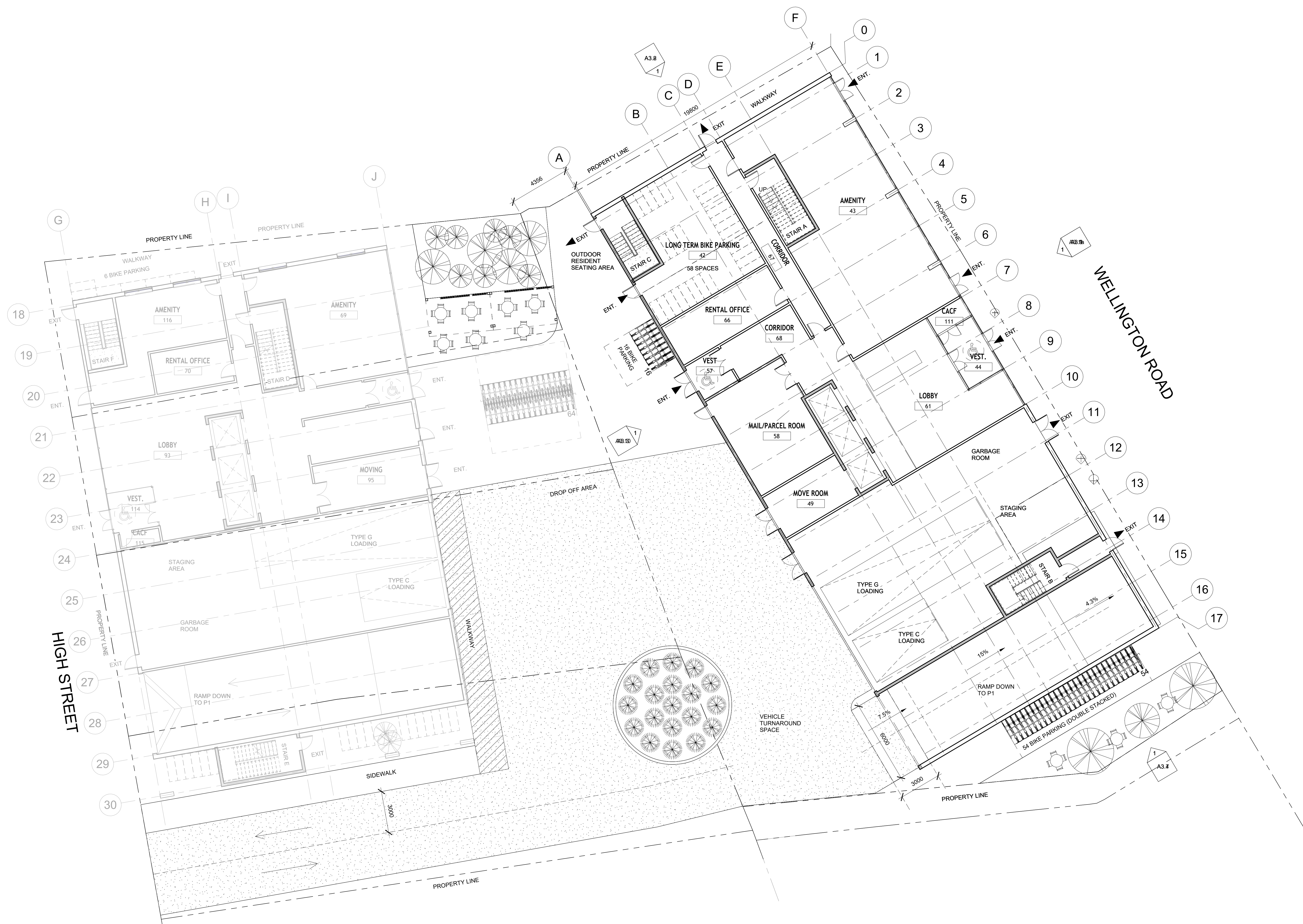
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M6P 3V6

DATE	2026-05-0
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SCALE	1 : 12
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① 1ST FLOOR
1 : 125



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CLIENT: FOUNDATION CAPITAL C/O MICHAEL NEMANIC

LOCATION: 57-75 WELLINGTON RD
LONDON, ONTARIO

L2-27 FLOOR PLAN

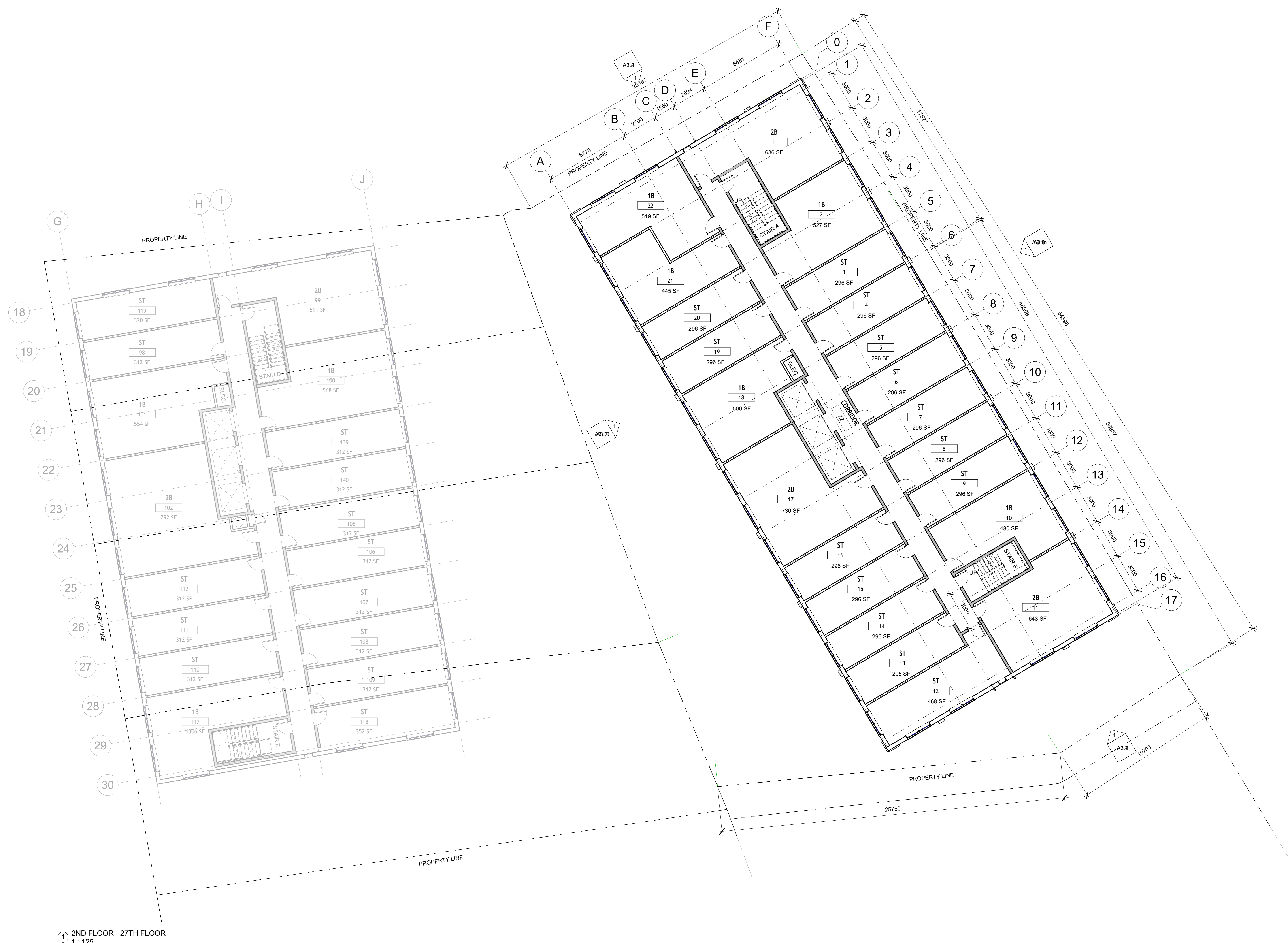
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M6P 3V6

DATE	2026-05-0
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SCALE	1 : 12
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① 2ND FLOOR - 27TH FLOOR
1 : 125

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APPENDIX II / *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 57-75 Wellington Road and 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 27-storey apartment building.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to lands located at 57-75 Wellington Road and 68 High Street in the City of London.

C. BASIS OF THE AMENDMENT

The recommended site-specific amendment facilitates one 27-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 Wellington Road.

D. THE AMENDMENT

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

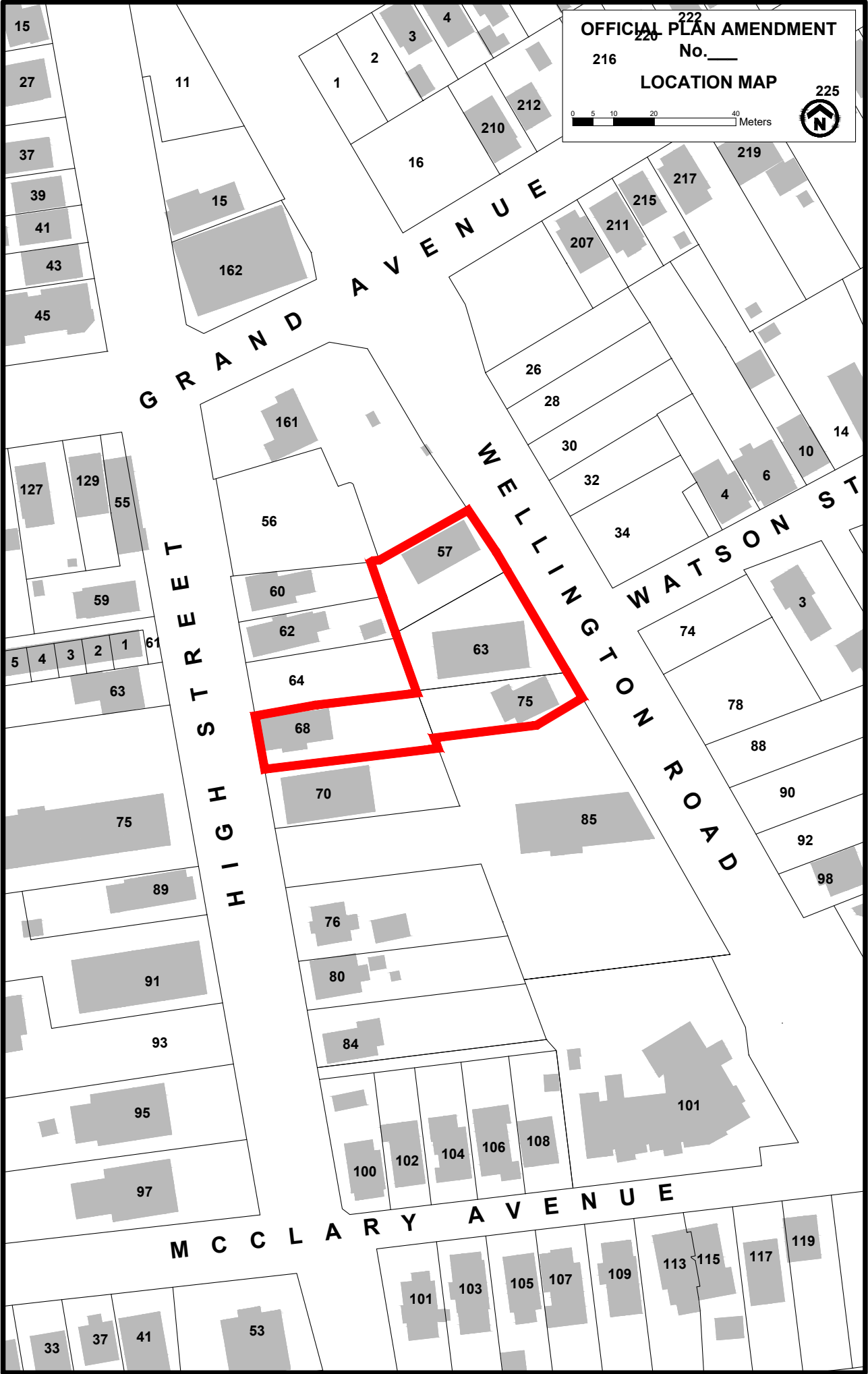
1. Specific Policies for the Rapid Transit Corridor Place Type of Official Plan, The London Plan, for the City of London is amended by adding the following:

() 57-75 Wellington Road and 68 High Street

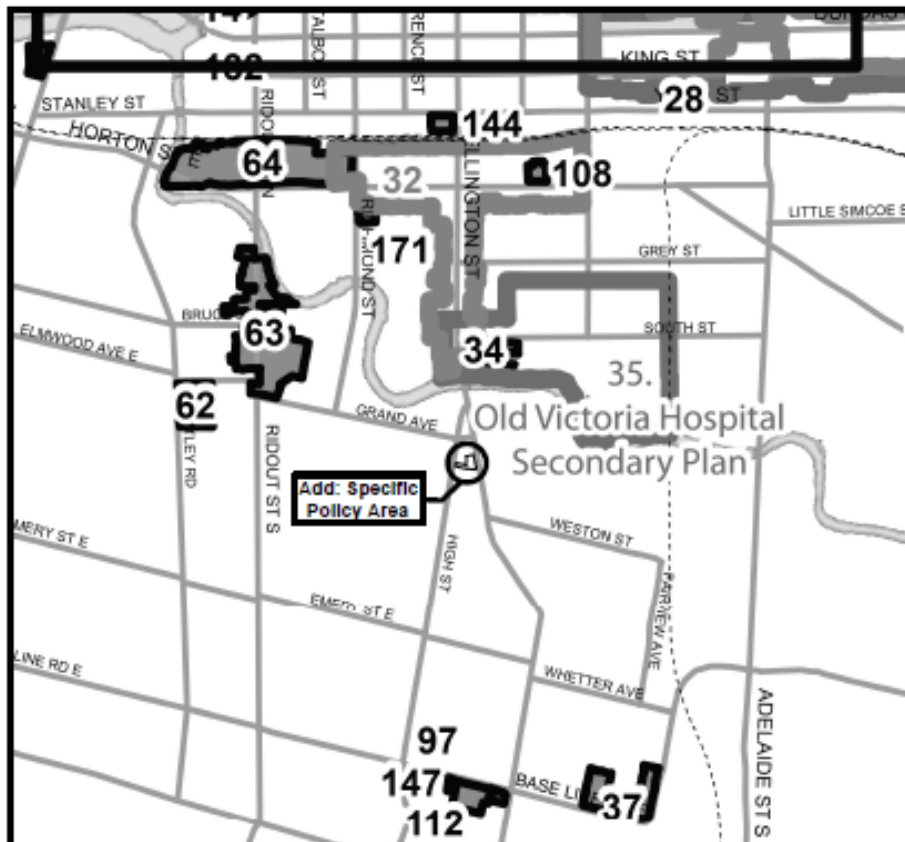
For the lands at 57-75 Wellington Road and 68 High Street, residential apartment buildings with a maximum height of 27-storeys, excluding the mechanical penthouse, may be permitted in addition to the existing permissions of the Rapid Transit Corridor Place Type.

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 57-75 Wellington Road and 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 Division's working consolidation of Map 7 - Special Policy Areas of the London Plan, with added notations.

SCHEDULE #
TO

OFFICIAL AMENDMENT NO. _____

PREPARED BY: CLIN SCHWAB & ASSOCIATES



SCALE: 1:20,000



File number:

Planner:

Technician:

Date: 2026/04/24

APPENDIX III / 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 57-75 Wellington
Road and 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 57-75 Wellington Road and 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(_) 57-75 Wellington Road and 68 High Street

a) Regulations

i) For the purpose of zoning, the front lot line is deemed to be
Wellington Road

ii) Interior Yard Depth (minimum) 1.4 metres

iii) Rear Yard Depth Abutting a Residential Zone (minimum) –
4.35 metres

iv) Height (maximum) – 84 metres

v) Floor Area Ratio (maximum) – 11.17

vi) Amenity Area (minimum) – 1.5 square metres per residential
unit

vii) Step Back – Shall not apply

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

ix) Notwithstanding Section 4.19(14) (Bicycle Parking
Requirements), a minimum of 0.33 long-term bicycle parking
spaces shall be required

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

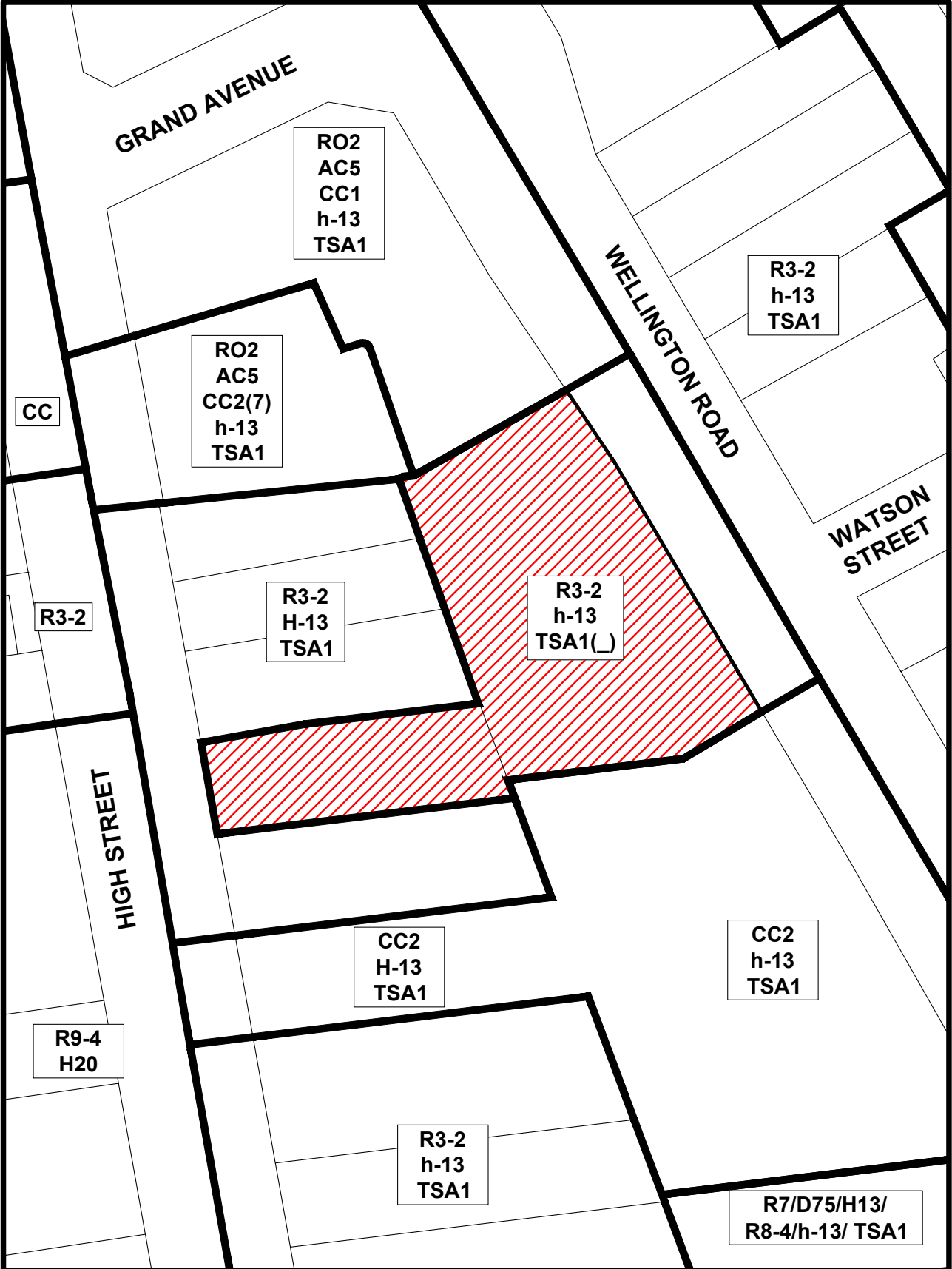
3. This Amendment shall come into effect in accordance with Section 34 of the Planning Act, R.S.O. 1990, c. P13, either upon the date of the passage of this by-law or as otherwise provided by the said section.

_____ 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: 2026/04/24
Technician:
By-Law No: Z.-1-

SUBJECT SITE 

