

Report to Planning and Environment Committee

To: Chair and Members
Planning & Environment Committee

From: Scott Mathers MPA, P. Eng.,
Deputy City Manager, Planning and Economic Development

Subject: 785 Wonderland Road Inc.
755, 785 & 815 Wonderland Road South, Ward 10
File OZ-9565
Public Participation Meeting on

Date: June 19, 2023

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of 785 Wonderland Road Inc. relating to the property located at 755, 785 and 815 Wonderland Road South:

- (a) Council supports refusal of the request to amend *The London Plan*, the Official Plan for the City of London to **ADD** a Specific Area Policy in the Shopping Area Place Type applicable to the subject lands to permit a maximum building height of 16 storeys, and to permit an increased amount of office gross floor area of 30,000 square metres, for the following reasons:
- i) The total amount of office space is not consistent with the Provincial Policy Statement, 2020 (PPS) as the level of intensification proposed on the subject site would compete with the downtown and does maintain or enhance its vitality;
 - ii) The increased height and office space does not conform to the policies of *The London Plan*, including but not limited to:
 - i) The Key Directions that ensure new development is a good fit within existing neighbourhoods.
 - ii) The proposed intensity does not conform to the City Structure Plan and the intensity of office uses.
 - iii) The design criteria contained in the City Design chapter for site layout and high-rise buildings.
 - iv) The Evaluation Criteria for Planning and Development Applications in the Our Tools chapter of *The London Plan*.
 - v) The Shopping Area Place Type policies to complete a master plan on large commercial infill development sites.
 - iii) The increased amount of office space is significantly over the 2,000 square metres contemplated for a suburban shopping area and undermines the role and future health of the Downtown as the primary office destination in the City.
 - iv) The requested amendment does not provide a suitable transition to the existing low density residential neighbourhood and represents an over-intensification of the site.
- (b) Council supports refusal of the request to amend Zoning By-law No. Z.-1 to change the zoning of the subject property **FROM** a Regional Shopping Area Special Provision (RSA2(3)) Zone **TO** a Residential R5 (R5-7) Zone; Restricted Service Commercial Special Provision/Residential R9 Special Provision (RSC2(_)/R9-7(_)*H25*D120) zone; Restricted Service Commercial Special Provision/Residential R9 Special Provision (RSC2(_)/R9-7(_)*H40*D200) zone; Restricted Service Commercial Special Provision/Residential R9 Special Provision (RSC2(_)/R9-7(_)*H48*D200) zone; Restricted Service Commercial

Special Provision/Residential R9 Special Provision (RSC2(_)/R9-7(_)*H55*D200) zone, for the following reasons:

- i) The total amount of office space is not consistent with the Provincial Policy Statement, 2020 (PPS) as the level of intensification proposed on the subject site would compete with the downtown and does maintain or enhance its vitality;
 - ii) The increased height and office space does not conform to the policies of *The London Plan*, including but not limited to:
 - i) The Key Directions that ensure new development is a good fit within existing neighbourhoods.
 - ii) The proposed intensity does not conform to the City Structure Plan and the intensity of office uses.
 - iii) The design criteria contained in the City Design chapter for site layout and high-rise buildings.
 - iv) The Evaluation Criteria for Planning and Development Applications in the Our Tools chapter of *The London Plan*.
 - v) The Shopping Area Place Type policies to complete a master plan on large commercial infill development sites.
 - iii) The increased amount of office space is significantly over the 2,000 square metres contemplated for a suburban shopping area and undermines the role and future health of the Downtown as the primary office destination in the City.
 - iv) The requested amendment does not provide a suitable transition to the existing low density residential neighbourhood and represents an over-intensification of the site.
- (c) Council supports the proposed by-law attached hereto as Appendix "A" at the Municipal Council meeting on June 27, 2023 to amend The Official Plan, The London Plan to **ADD** a Specific Area Policy in the Shopping Area Place Type applicable to the subject lands to permit a maximum building height of 12 storeys along Wonderland Road South and Viscount Road.
- (d) Council supports the proposed by-law attached hereto as Appendix "B" at the Municipal Council meeting on June 27, 2023 to amend Zoning By-law No. Z.-1, in conformity with The Official Plan, The London Plan, to change the zoning of the subject property **FROM** a Regional Shopping Area Special Provision (RSA2(3)) Zone **TO** a holding Residential R5 Special Provision/Regional Shopping Area Special Provision (h-5*h-54*h-63*h-123*h-149*h-213*h-()*R5-7()/RSA2()) Zone; a holding Residential R8 Special Provision/Regional Shopping Area Special Provision (h-5*h-54*h-63*h-123*h-149*h-213*h-()*R8-4()/RSA2()) Zone; and a holding R9 Special Provision/Regional Shopping Area Special Provision (h-5*h-54*h-63*h-123*h-149*h-213*h-()*R9-7()*H36/RSA2()) Zone.

Executive Summary

Summary of Request

The requested amendment to The London Plan is to add a specific area policy to the Shopping Area Place Type to allow for the greater height of 16 storeys (55m) whereas up to six (6) storeys is contemplated, and to permit an increased amount of office gross floor area of 30,000 square metres, whereas up to 2,000 square metres is contemplated.

The requested amendment to the Z.-1 Zoning By-law is to: add the Residential R5-7 zone which permits cluster townhouses and cluster stacked townhouses; the Residential R9-7 zone permits a range of higher density residential uses including: apartment buildings, lodging house class 2, senior citizens apartment buildings, handicapped persons apartment buildings, and continuum of care facilities; and to

maintain the Regional Shopping Area zone and add additional permitted uses of commercial and private schools and kennels, and a new special provision to allow a total of 30,000 square metres of office gross floor area.

The application has been appealed to the Ontario Land Tribunal (OLT), and therefore, Council has no jurisdiction to enact a Zoning By-law Amendment or pass an Official Plan Amendment. Accordingly, although Council may support refusal of the requested amendment, and may support approval of the recommended action, the OLT's decision is final and binding. The OLT will consider Council's decision in making its determination.

Purpose and Effect of the Recommended Action

The recommended action is for Council to support the refusal of the requested amendment with an alternative recommendation proposed to allow for new residential uses at an appropriate scale to the surrounding context. The alternative recommendation will permit an expanded range of uses to facilitate the appropriate redevelopment of the existing shopping centre while ensuring the site does not compete with the downtown for total office space or undermines its role as the central business district city-wide.

Rationale of Recommended Action

SUPPORT REFUSAL of the requested Official Plan and Zoning By-law Amendment:

1. The total amount of office space is not consistent with the Provincial Policy Statement, 2020 (PPS) as the level of intensification proposed on the subject site would compete with the downtown and does maintain or enhance its vitality;
2. The increased height and office space does not conform to the policies of *The London Plan*, including but not limited to:
 - i) The Key Directions that ensure new development is a good fit within existing neighbourhoods.
 - ii) The proposed intensity does not conform to the City Structure Plan and the intensity of office uses.
 - iii) The design criteria contained in the City Design chapter for site layout and high-rise buildings.
 - iv) The Evaluation Criteria for Planning and Development Applications in the Our Tools chapter of *The London Plan*.
 - v) The Shopping Area Place Type policies to complete a master plan on large commercial infill development sites.
3. The increased amount of office space is significantly over the 2,000 square metres contemplated for a suburban shopping area and undermines the role and future health of the Downtown as the primary office destination in the City.
4. The requested amendment does not provide a suitable transition to the existing low density residential neighbourhood and represents an over-intensification of the site.

SUPPORT APPROVAL of the recommended Official Plan and Zoning By-law amendment:

1. The recommended amendments are consistent with the Provincial Policy Statement.
2. The recommended amendments conform to the in-force policies of *The London Plan*, including, but not limited to, the City Structure policies, City Building and Design, Our Tools, and all other applicable *The London Plan* policies.
3. The zoning will permit development that is considered appropriate and compatible with the existing and future land uses surrounding the subject lands

and broaden the use of the site.

Linkage to the Corporate Strategic Plan

The Corporate *Strategic Plan* supports A Well-Planned and Growing Community by ensuring that the City's growth and development are well planned, sustainable and in strategic locations to maximize existing assets and resources. Decreasing commercial vacancy in the core area is identified to support Economic Growth, Culture and Prosperity, requires that the role of the Downtown as the primary office centre is reinforced and maintained. The subject site is intended for moderate growth and intensification within the City Structure Plan and would compete with the downtown for office uses.

Climate Emergency

On April 23, 2019, Council declared a Climate Emergency. Through this declaration the City, is committed to reducing and mitigating Climate Change. Please refer to Appendix "G" for further details on the characteristics of the proposed Application relates to the City's climate action objectives.

Analysis

1.1 Previous Reports and Applications Related to this Matter

A.036/23 – Minor variance application to permit an increased "Place of Entertainment" of 20% whereas a maximum of 16% is permitted to permit a circus.

Z:9356 – September 20, 2021: Application to add a Call centre use at Westmount Mall recommended for refusal and referred back to staff by Council (withdrawn).

O:9409/Z:9410 – January 31, 2022: Application to add a Kennel as an additional permitted use, approved by Council on February 15, 2022.

B.041/21 – July 6, 2022: Severance of three (3) individual commercial pads at the intersection of Wonderland Road South and Viscount Road approved.

Z-7885 – May 16, 2011: Application to add a commercial school.

1.2 Planning History

On April 24, 2023, the subject application OZ-9565 was appealed for lack of decision made under section 17(40) of the Planning Act. The appeal is active as case number OLT-23-000367.

In January, 2022, an application to add a Kennel (Dogtopia) was approved as an additional permitted use through a special provision (RSA2(3)).

In 2021, a Zoning By-law Amendment was requested to add Business Service Establishment as an additional permitted use to the existing zone to allow a proposed call centre (Z-9356). Staff recommended the request be refused at the September 20, 2021 Planning and Environment Committee (PEC) meeting. The application was referred back to staff to facilitate further discussions with the applicant before returning to a future PEC meeting. The application was formally withdrawn on March 17, 2023 as the request was incorporated into the existing application OZ-9565.

In 2021, a severance of three (3) individual commercial pads located at 775-805 Wonderland Road South, at the intersection of Viscount Road and Wonderland Road South occurred from the shopping centre property.

In 2011, the subject site was rezoned from a Regional Shopping Area (RSA2) Zone to a Regional Shopping Area Special Provision (RSA2(2)) Zone to permit a 2,020 square metre commercial school (Z-7885).

1.3 Property Description

The subject lands are located in the Westmount Planning District and bordered by Wonderland Road South to the east, Village Green Avenue to the north, Viscount Road to the south and Woodcrest Boulevard to the west. The site is occupied by an existing two-storey enclosed shopping centre, known as Westmount Mall. There are a broad range of existing retail, office, commercial recreation, and entertainment uses. The shopping centre was built in the 1980's and has been added to and modified multiple times since its initial construction. The adjacent parcel, municipally addressed as 775-805 Wonderland Road South, is developed with three commercial retail units (CRUs) and recently severed from the Shopping Centre parcel.

The existing mall building, excluding the movie theatre and adjacent commercial retail units (CRUs), has a gross floor area of approximately 49,373 square metres (531,464 square feet) and a gross leasable floor area of approximately 41,847 square metres (450,448 square metres). The existing ground floor of the mall is occupied by retail uses and the City of London Social Services satellite office. The second floor is comprised of offices (medical/dental, professional, service etc.), as well as a number of vacant units.

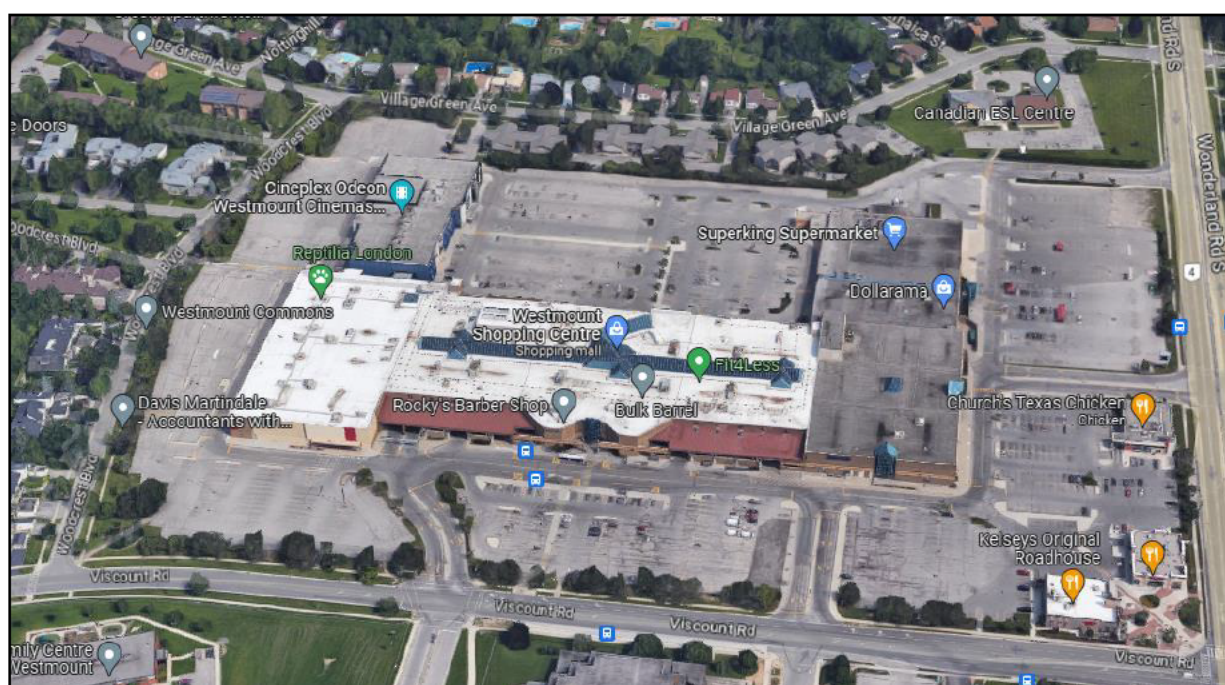


Figure 1: Subject Site – Google 3D View

1.4. Current Planning Information (see more detail in Appendix E)

- The London Plan Place Type – Shopping Area
- Existing Zoning – Regional Shopping Area Special Provision (RSA2(3)) Zone

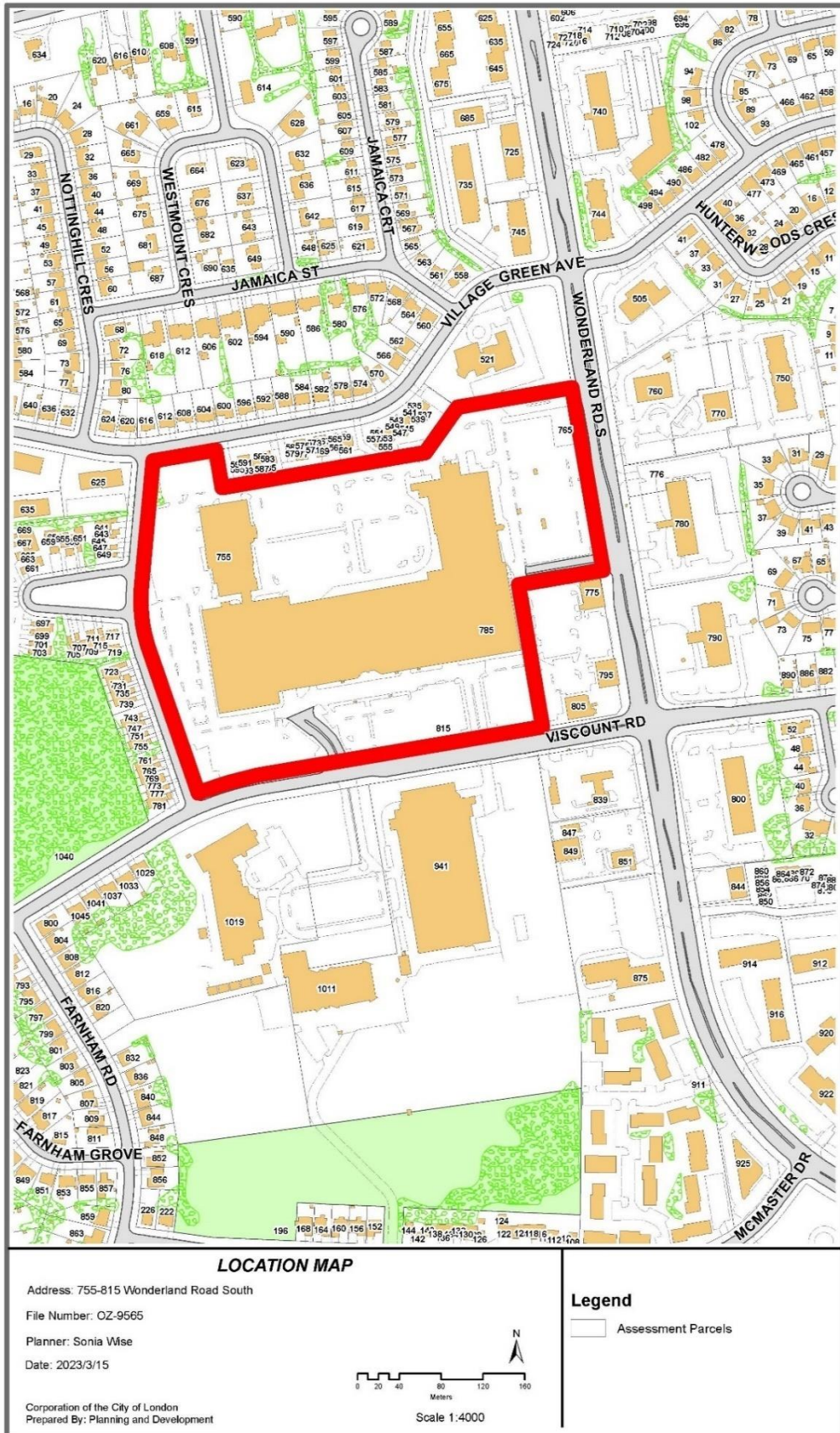
1.5 Site Characteristics

- Current Land Use – Shopping Centre
- Frontage – 176.4m
- Depth – 620m
- Area – 11.34ha
- Shape – Irregular

1.6 Surrounding Land Uses

- North – Place of Worship, Low-rise Residential
- East – High-rise residential
- South – School, Secondary School, Commercial Uses
- West – Low-rise residential

1.7 Location Map



2.0 Description of Proposal

2.1 Development Proposal and Amendments

A complete application was accepted on November 23, 2022 for an Official Plan and Zoning By-law Amendment as file OZ-9565, to redevelop the site into a mixed-use development comprised of commercial, office and high density residential uses. The existing shopping centre is proposed to be re-purposed as a podium for future mixed-use apartment buildings.

On April 24, 2023, the subject application was appealed for lack of decision made under section 17(40) of the Planning Act. Council may endorse or support a development proposal either as requested or as staff recommended, however is not able to approve or refuse the request.

2.2 Revised Development Proposal and Amendments

In March, 2023, a revised request was received for discussion, which is the current request for amendment. The revised request was for 30,000 square metres of office gross floor area, which was reduced from the initial request of 40,000 square metres.

Development would be contemplated both on the existing shopping centre and on vacant parts of the site that are currently used for surface parking.



Figure 2: Proposed Rendering from Viscount Road

A policy framework was also submitted to support the requested development that was structured as an area plan/secondary plan. Three Special Policy Areas as identified in Figure 3 have different proposed uses, intensities and form.



Figure 3: Proposed Special Policy Areas

Special Policy Area 1: Wonderland Rd S

This policy area is proposed to include:

- Mid-rise, high-rise apartment buildings and seniors residences
- Office uses are proposed to be located on the 2nd floor of each building
- Commercial uses are proposed for the ground floor
- Heights are proposed up to 16 storeys
- Densities up to 250uph

Special Policy Area 2: Viscount Road

This policy area is proposed to include:

- Townhouse, cluster townhouse, low-rise to high-rise apartment buildings
- Office uses are proposed to be located on the 2nd floor of each building
- Commercial uses are proposed for the ground floor
- Heights are proposed up to 10 storeys
- Densities up to 200 units per hectare

Special Policy Area 3: Woodcrest Blvd & Rear of Lands

This policy area is proposed to include:

- Multiple attached dwellings such as townhouses, stacked townhouses, low to mid-rise apartment buildings and seniors housing
- Building heights are proposed up to 6 storeys
- Densities up to 120 units per hectare

A height map was prepared to show the general heights proposed. The majority of the greatest heights are proposed towards the interior of the site where the existing shopping centre is.

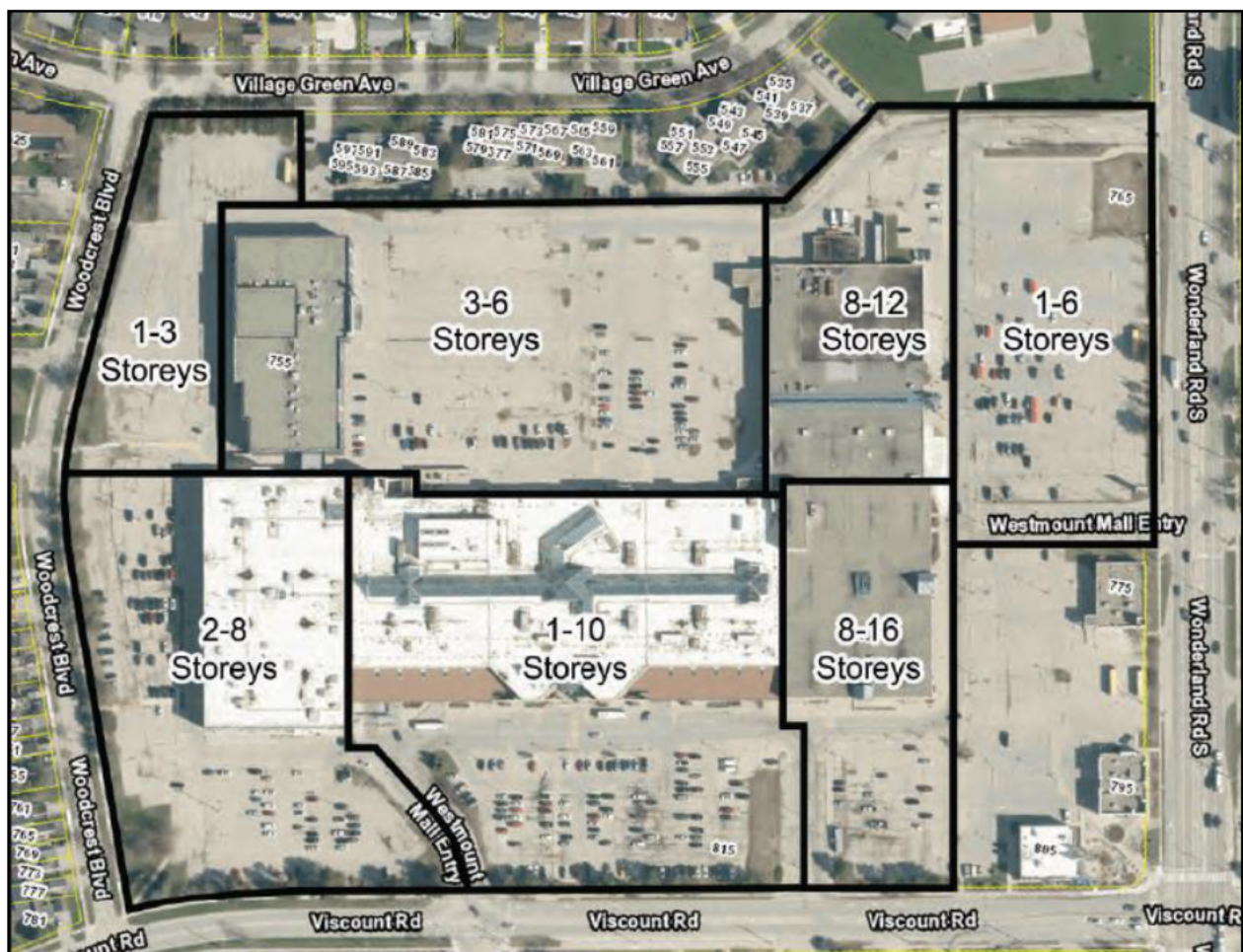


Figure 4: Proposed Height Map

A corresponding zoning map was also provided which shows the requested amendments as follows:

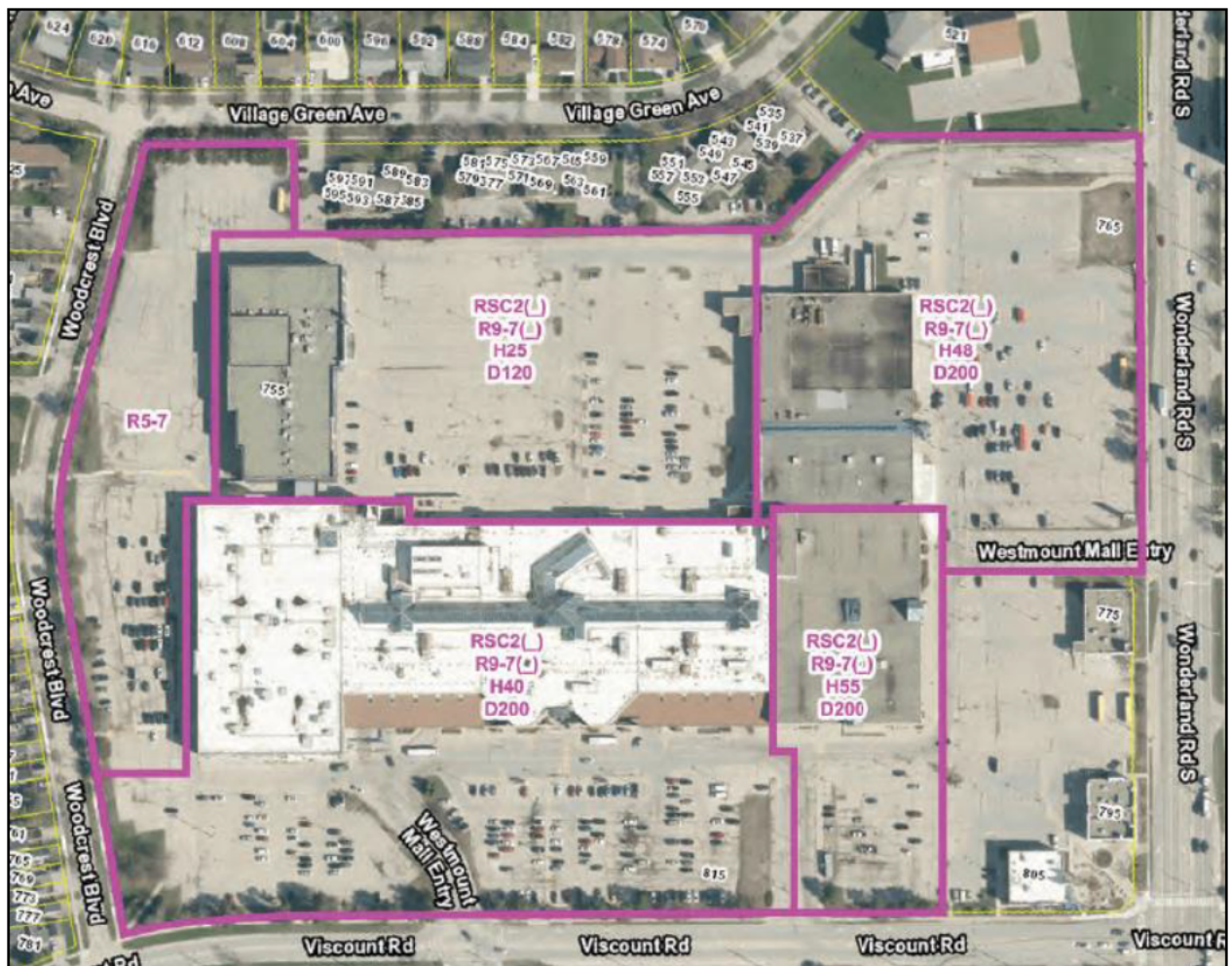


Figure 5: Proposed Zoning Amendment

2.2 Initial Request

The initial request for the amendments proposed buildings on top of the existing 2 storey shopping centre range from 8 -16 storeys. The first level of each new building would be for office use, adding approximately 20,000sqm of office GFA to the subject lands for a total overall request of 40,000sqm of office gross floor area.

The initial request also considered demolition of the existing free-standing cinema building and incorporating townhouse development and mid-rise residential development in the northwest quadrant of the site. The overall re-development plan was for a total of 900 residential units, including apartment buildings located on top of the shopping centre containing approximately 680 units. An additional 220 residential units from new development in the northwest quadrant would occur as 24 townhouse dwellings and 196 apartment units.

The existing underground parking area and surface parking areas would be maintained and an expansion of the underground parking garage is contemplated. Vehicular access and internal roadways would remain as existing with the exception of demolished buildings and their immediate area.



Figure 6: Initial Proposed Rendering from Wonderland & Viscount

2.3 Initial Amendments

The initial requested Official Plan amendment was to permit the increased height of 16 storeys, whereas the Shopping Area Place Type permits heights up to 6 storeys, and to permit an increased amount of office gross floor area to 40,000 square metres whereas up to 2,000 square metres is contemplated currently.

The requested Zoning By-law amendment was to rezone the lands to a site-specific RSA2() Zone and add the Residential R5 (R5-6) Zone and Residential R9 (R9-7) Zone to permit:

- Increased height of 16 storeys (65m)
- Increased office gross floor area of 40,000 square metres
- Additional uses of: Business Service Establishment, Automobile Sales Boutique, Craft Brewery, Artisan Workshop
- A new use and definition for a 'Call Centre: An establishment set up to handle large volume of phone calls, typically in support of other business operations such as but not limited to, marketing/surveying firms, and customer service operations'
- Residential uses including: cluster townhouses, stacked townhouses, apartment buildings, lodging house class 2; senior citizens apartment buildings; handicapped persons apartment buildings; and continuum-of-care facilities

Studies and reports provided with the application include:

1. Archaeological Assessment – Lincoln Consulting – November, 2022
2. Transportation Impact Study – LEA – October, 2022
3. Office Market Needs Analysis – Urban Metrics – August, 2022
4. Planning Justification & Design Report – Zelinka Priamo – September, 2022
5. Servicing Design Brief – Development Engineering – November, 2022

The submitted reports were circulated and reviewed by City Staff, the UTRCA other commenting agencies. The application has not been reviewed by the City's Urban Design Peer Review Panel.

2.4 Community Engagement (see more detail in Appendix C)

Replies were received from 14 respondents that expressed the following:

Concern for:

Use: Not well thought out x2, Should demolish mall and rebuilt x1, Construction nuisance (dust, noise, vehicles) x4, Disrupts neighbourhood x3, Damage to homes x2, Loss of home value x2, Built elsewhere x1 (Southdale Rd)

Intensity: Stress on city services (schools, servicing etc) x3, Too many units x1, Safety impacts, x3, Negative impacts to downtown office space, x4, Not consistent with the City Structure Plan x1, Office Needs Study should be peer reviewed x1

Form: noise x3, Should locate intensity towards Wonderland x1, Impact to birds of high rises x1, Loss of Sunlight x3, Loss of views x1

Traffic: Traffic congestion in area x7

Support for:

Support proposal, will curb sprawl x1, Exciting redevelopment opportunity x1

2.4 Policy Context

Provincial Policy Statement, 2020

The Provincial Policy Statement (PPS), 2020 provides policy direction on matters of provincial interest related to land use planning and development. In accordance with Section 3 of the Planning Act, all planning decisions “shall be consistent with” the PPS.

The Provincial Policy Statement (PPS) promotes growth within settlement areas that are well-served by transit, and enhancing the vitality of the Downtown.

The London Plan – City Structure Plan

The City Structure Plan within The London Plan provides the framework for London’s growth and change over the next 20 years. There are strategic locations identified for growth, development and infill which include the Downtown, the four (4) Transit Villages, and the corridors that connect them. There are also numerous opportunities for redevelopment and intensification in other place types, though at a more moderate scale.

The City Structure Plan focuses the greatest levels of intensities to these strategic areas to manage growth on a city-wide bases, promote a compact form of development, integrate the highest levels of transit and ensure infrastructure financing is predictable and anticipated. The Shopping Area place type does contemplate a greater mix of uses and has infill potential, though is at a more moderate rate than the other parts of the City Structure plan where the highest development opportunities are directed.

The London Plan – Place Type

The site is in the Shopping Area Place Type with frontage on an Urban Thoroughfare (Wonderland Road South), two Neighbourhood Connectors (Viscount Road and Village Green Boulevard) and a Neighbourhood Street (Woodcrest Boulevard). A broad range of retail, service, business, recreational, social and educational uses are permitted. Shopping Areas will re-format to become more pedestrian, cycling and transit-oriented and less automobile dominated in their design. Heights up to six (6) storeys are contemplated with up to 2,000 square meters of office gross floor area to accommodate moderate intensification.

3.0 Financial Impact/Considerations

There are no direct municipal financial expenditures associated with this application.

4.0 Key Issues and Considerations

4.1 Provincial Policy Statement, 2020

The Provincial Policy Statement (PPS), 2020 provides policy direction on matters of provincial interest related to land use planning and development. In accordance with Section 3 of the Planning Act, all planning decisions “shall be consistent with” the PPS.

The PPS recognizes the important role of the downtown within cities through policy 1.7.1.d) which states that long term economic prosperity is supported by “maintaining and, where possible, enhancing the vitality and viability of downtowns and mainstreets”. The Downtown is London’s dominant office area where the greatest amount of office use is permitted to ensure it remains a key economic driver for the City. Allowing a significant amount of office space outside of the Downtown will compromise the function and role city-wide and set a precedence for other suburban expansions.

The PPS further identifies that employment areas should be planned for, protected and preserved for current and future uses (1.3.2.1). The Downtown is a major employment area that provides numerous jobs city-wide in a concentrated space that should continue to be protected to ensure its long-term health and city-wide focus.

Section 1.8 of the PPS identifies that land use and development patterns should “focus major employment, commercial and other travel-intensive land uses on sites which are well served by transit where this exists or is to be developed” (1.8.1.c)). The subject site has an on-site interchange for a number of bus routes, though is not one of the identified Transit Villages where the greatest intensity and levels of transit services are directed to provide the most optimal integration.

Settlement areas are the focus for growth and development, and planning authorities shall identify appropriate locations for transit-supportive development and to accommodate a range of housing options (1.1.3.3). The subject site is within an existing settlement area and can support additional land uses and intensification, though at a more moderate and context specific amount. Land use must be carefully managed to accommodate appropriate development to meet current and future needs and achieve efficient development patterns (IV).

The subject site is considered appropriate to support redevelopment at a more moderate scale that would be reflective of its place in the City Structure and overall hierarchy. An alternative recommendation is proposed to provide redevelopment opportunities at an appropriate scale and intensity.

4.2 Land Use

Office Use and Call Centre

Within the Shopping Area Place Type, a broad range of retail, service, office, entertainment, recreational, educational, institutional, and residential uses may be permitted. Mixed-use buildings will be encouraged. Uses with large amounts of outdoor storage, large warehouse components, storage of heavy vehicles, and/or emitting noise, vibration, or dust, will not be permitted. The full range of uses described above will not necessarily be permitted on all sites (_877,1-5.).

There are a broad range of uses currently permitted and a request to add a number of additional uses including: Business Service Establishment, Automobile Sales Boutique, Craft Brewery, and Artisan Workshop. These uses would be generally consistent with the role of the Shopping Area and represent a moderate expansion of permitted uses.

An additional new use for a ‘Call Centre’ is requested as a new definition as follows:

“An establishment set up to handle large volume of phone calls, typically in support of other business operations such as but not limited to, marketing/surveying firms, and customer service operations”.

It is the opinion of staff that a 'call centre' is appropriately captured and classified as an 'office use' and that a separate definition is not warranted. A call centre and office would both utilize traditional office layouts, equipment and function. Some specific types of offices occasionally warrant separate definition due to differences in intensity or patronage, such as a medical/dental office. A call centre would not be anticipated as a destination draw for the public, clients, customers or patients, and the space is anticipated to be occupied primarily by employees, which is reflective of a common office use. There is no substantial land use difference between a call centre and an office that would warrant a separate definition, classification or regulation through zoning. The definition for office is as follows:

"OFFICE" means a building, or part thereof, containing one or more offices including professional or service offices and all other forms of offices except medical/dental offices.

Permitting the call centre as a newly defined use would have the same effect of permitting an abundance of office space simply under a new name, which is contrary to official plan policy and not supported.

Residential Uses

The proposed addition of residential land use for the site is aligned with the Shopping Area Place Type policies to "introduce mid-rise residential development into these existing centres to intensify their use, promote activity on these sites outside of shopping hours and strengthen their role as neighbourhood centres" (876_5). The proposal to add cluster townhouse dwellings, cluster stacked townhouse dwellings, apartment and other specialized residential buildings are appropriate land uses for the site. The overall scale, intensity, urban design and built form of the new residential uses require further refinement and adherence to the policy framework which is detailed further in this report.

4.3 Amount of Office Space

The London Plan identifies a hierarchy of office space and intensity with the Downtown at the top, followed by the Transit Villages, and with Shopping Areas providing a nominal amount of local office space. This hierarchy directs large office spaces to the Downtown to ensure its long-term health and vibrancy, while providing more moderate amounts of suburban office space to serve local areas at a smaller scale (128_). Additional policies in the Downtown Place Type direct large scale office developments, greater than 5,000 square metres to the Downtown to prevent the deterioration of the important Downtown office market while still allowing for a reasonable supply of office uses outside of the Downtown (799_14). In the Shopping Area Place type, the total amount of aggregate office uses will not exceed 2,000 square metres, which recognizes its role in the hierarchy and provides a small amount of suburban office space (878_6).

When The London Plan was prepared, there was an Office Policy Study prepared by Hemson Consulting Ltd, in April of 2016 to inform and support the development of the official plan policies. The report analysed the effectiveness of the policies to achieve the objectives of The London Plan policies, as well as key considerations such as changing market factors, office management trends and similar policies of other mid-sized cities across North America. This report helped inform and reinforce to the policy framework that is now in effect and in place. Some of the key findings include:

- The 2016 market conditions favoured suburban office development with Class B and Class C office space in the Downtown struggling to attract tenants
- London's office management policies are some of the most prescriptive for managing office development amongst cities of similar size and economic character. Only the City of Regina has more restrictive policies, and in this same regard, both Regina and London have been the most successful examples of retaining office development in their downtown areas (88% and 79% respectively)

- Raising the threshold (over 5,000m²) was not recommended as it would make it much easier for major firms to relocate away from the Downtown, undermining the goals of the Official Plan

An Office Needs Analysis was prepared by Urban Metrics as part of the submission for the Official Plan and Zoning Amendment Application. Similar to the Office Policy Study by Hemson, the Office Needs Analysis by Urban Metrics both recognized the trend that there was greater demand for office space in the suburbs than the downtown core. Unlike Hemson, however, Urban Metrics suggested that adding additional office space to the downtown core is unlikely to attract tenants unless it is Class A space and that Class B and C office space should be permitted to develop in the suburbs where there is very high demand.

Both studies recognize the same trend that there is high demand for office space outside of the Downtown which indicates that this has been a persistent issue for the City. City Council, through the adoption of The London Plan policies has taken the approach that the Downtown should remain the primary office area for the City and that this should be protected by restricting office uses outside of the Downtown boundary. The City's Realty Services division reviewed the report submitted and are not in agreement that such a large amount of new office space should be permitted as it would compete with the downtown for office vacancy. Major office uses and GFA should continue to be directed to the Downtown as per policy.

The applicant's Urban Metrics report also identified that the proposed office space at Westmount "would reduce the number of auto or transit-oriented trips for employees who currently or in future will work in the Downtown core". This is an important acknowledgment of the role and draw of the downtown as a major employment destination. Having employees within the downtown is desirable, not discouraged, as workers activate the streets through pedestrian movements and support downtown merchants. The Downtown is also in the centre of the City which has the best transit routes connecting all areas of the City, providing convenient alternatives to single-vehicle trips. Transit ridership to the core is similarly desirable and not discouraged as it provides an efficient method of travel and reduces private vehicle traffic.

4.4 Impact on the Downtown and Revitalization Efforts

The Downtown has long since been the focus for revitalization and investment through a number of initiatives and plans such as:

Core Area Community Improvement Plan, 2021: Strategy to guide redevelopment and improvements in the Downtown, Richmond Row and Old East Village. Includes an incentive program to provide grants to implement safety, boulevard cafés, and signage. The 5 year review was recently brought forward to June 12 Planning and Environment Committee.

Core Area Action Plan, 2019: Includes the Business Improvement Areas (BIAs) of the Downtown, Richmond Row and Old East Village. The Core Area Action Plan was developed to address challenges common in the inner core, one of which was acknowledged high vacancies in existing office buildings, with an update brought forward on May 30, 2023 to the Strategic Priorities and Policy Committee.

Our Move Forward – London's Downtown Plan, 2015: Establishes a vision for the Downtown and charts a path forward to continue revitalization. The Plan recognizes that the Downtown has "continually maintained its status as the office employment centre of London, with over 80% of the city-wide office space" (p.12). There are a number of key Strategic Direction including one to 'Create the Buzz' which contains relevant planning policies, such as 6.1, to: Maintain and enhance the downtown as the major focus for employment and economic activity within the city and region (p.65).

Downtown Community Improvement Plan (CIP): Provides the context for coordinated municipal efforts to improve the physical, economic and social climates of the Downtown. One of the stated goals is "to promote the continued development of the

Downtown as the primary business, office, cultural and administrative centre for the City”

Downtown Millennium Plan, 1998: Identified a series of projects and initiatives for revitalization including the Downtown Arena (Budweiser Gardens), improvements to the Downtown Library and Market as well as various incentive programs.

State of the Downtown, 2019

One method of tracking the progress or challenges is captured in the “State of the Downtown” which is prepared every other year to evaluate and reflect the overall status. The Downtown comprises 0.2% of London’s land area and, in 2019, employed over 39,000 people which was 19% of all people employed in the City.

According to the latest “State of the Downtown” from 2019, there was an overall total of 418,308 square metres, or 4.5M square feet of office supply in the downtown, which represents almost 75% of the City office inventory. In 2015 this amount was at 80% which reflects a reduction of the total supply downtown and/or an increase in office space outside of the downtown. Additionally, the London core vacancy rate was 18.4% by the final quarter of 2019 which is well above the considerations of a healthy rate of 5-8%.

Additionally, a Core Area Land and Building Vacancy Reduction Strategy was prepared which included analysis and research conducted by Tate Economic Research Inc. in 2022, providing an updated Building Vacancy Study. The strategy found that there was a vacancy rate of 24.6% in the third quarter of 2022, or 110,645 square metres (1,190,983 square feet) of vacant commercial office space, with 339,483 square metres (3,654,171 square feet) of occupied space for a total of 450,128 square metres (4,845,145 total square feet) of class A, B and C office space. The impact of COVID-19 has resulted in increased vacancy with the difference pre COVID at Q3 of 2019 and Q3 2022 being approximately 6%.

The requested 30,000 square metres (322,917 sq ft) of office space at Westmount Mall would shrink the total amount of office space located in the downtown as a proportion of the City’s inventory. Permitting such a large amount of office space in a suburban context undermines the role of the downtown and does not represent a unique situation and could be precedent-setting. Staff do not support the requested increase in the amount of office space and would direct any new office of this size to locate in the downtown.

The numerous current initiatives and previous efforts related to the downtown focus on its long-term health and continued revitalization. In most, there is acknowledgement and effort to maintain the downtown as the primary office destination as it contributes to its vitality, helps attract a younger population, increases tourism and supports local businesses.

4.5 Residential Intensity

The City Structure Plan identifies strategic locations for more intense growth such as the downtown or transit villages development, as well as locations identified for more moderate growth such as the Shopping Areas. The intensity policies allow for more intense and efficient use of Shopping Area sites through redevelopment, expansion and the introduction of residential development (878_1). Introducing mid-rise residential development into these centres to intensify their use, promote activity outside of shopping hours and strengthen their role as neighbourhood centres is encouraged. High-rise residential uses are not contemplated in the Shopping Area Place Type and are instead directed to more strategic areas of the City such as the Transit Villages, Downtown and Rapid Transit Corridors.

One of the primary measures for intensity within The London Plan is building height for new development applications. Within the Shopping Area Place Type, buildings are contemplated up to 6 storeys in height which equates to a mid-rise form (878_2). The

requested heights are up to 55m for parts of the site which is approximately 18 storeys and represent a high-rise form that requires a specific policy consideration.

The residential intensity proposed for the site at a maximum of approximately 18 storeys is not supported as it is not aligned with the City Structure Plan and overall role of the Shopping Centre, requires more refinement for the design and built form elements and does not provide adequate transition to the adjacent residential neighbourhood.

The alternative recommendation recognizes that there are on-site transit services, nearby schools and commercial and service uses that would all support new residents and recommends a more moderate residential intensification. The recommended amendment provides development options and flexibility for new built form, while also providing an appropriate transition to the adjacent neighbourhoods, directing new development to locate in the most appropriate parts of the site.

While there is a surplus of parking spaces (2,556 proposed where 1,846 are required), there is an absence of green space, amenity areas and landscaped open space which are all required for balanced mixed-use development and new residents.

An alternative recommendation that provides for residential uses at an appropriate scale include the following:

- A low-rise residential area along the north and east of the site which have an interface with the existing abutting neighbourhoods. Townhouses and stacked townhouses up to a maximum height of 3 storeys are recommended to ensure development is a good fit with the existing neighbourhood and provides a suitable transition from the higher intensity forms of development.
- A high-rise residential area is recommended along the Viscount Road frontage to the east of the Westmount Mall entry and along the Wonderland Road frontage. The residential intensity is recommended up to 12 storeys in height where there are existing high-rise forms and the greatest separation to the existing low-rise neighbourhoods. Some redevelopment of the shopping centre could be considered along the eastern portion of the site, however; the greatest development potential is provided on the surface parking lots along the major roads to promote the development of the parking areas and activate the street edge.
- A mid-rise form of up to 6 storeys in height is recommended for the remainder of the site primarily occupied by the existing shopping centre and to the west of the Westmount Mall entry. This enables some redevelopment at a mid-rise scale, while directing the most intensive built forms to more desirable locations where they are appropriate and can have the greatest impact.

In addition to the residential intensity recommended, it is noted that partial or full development may only occur if it can be demonstrated that the sanitary capacity is available. More detail is provided in section 4.7 of this report.

4.5 Urban Design and Built Form

To achieve the City Design objectives, all planning and development applications shall conform with the Character, Street Network, Streetscapes, Public Space, Site Layout and Buildings policies (194_).

The Shopping Area Place Type also contains policies related to form (879_2-8), including:

- the integration of a grid of driveways to provide a form of large-lot development that can be redeveloped more easily in phases at a future date, to allow the opportunity for redevelopment of the rear portion of commercial blocks in the future, to allow for better connections through the site for pedestrians, transit users, and cyclists, and to allow the possibility for future neighbourhood connections that would connect transit services, the street and the commercial block to the neighbourhood (879_2);
- large commercial blocks should be developed such that smaller-scale commercial uses are constructed on pads at the front of the lot to create, to the

greatest extent possible, a pedestrian-oriented street wall, with front entrances oriented toward and accessible from the primary street, and to screen large fields of parking from the road (879_3);

- amenities, such as landscaping, street furniture, and patios, should be designed and provided on the site to attract pedestrian activity (879_4);
- large commercial blocks should be designed to incorporate wide, tree-lined sidewalks that will allow pedestrians clear, safe, direct and comfortable access through parking lots (879_5);
- opportunities will be explored for creating central seating areas and private parkette features that enhance the centre's function as a public meeting place (879_7); and,
- abundant tree planting (879_8).

The subject site is a good candidate to accommodate new residential development, though it requires a thoughtful and comprehensive consideration of the entire property. There was no masterplan provided that would establish an organizational structure of how vehicle connections, pedestrian connections, development blocks, green space and tree planting would be incorporated into the overall planning of the site. A masterplan is a critical piece in understanding how the various aspects and features of development will work together cohesively and a holding provision is recommended to ensure one is created.

Further, the proposed development form locates the new apartment buildings on top of the existing shopping centre and maintains the surface parking on site. Locating the new buildings away from the street edge does not establish a pedestrian-oriented street wall or provide activation with the various pedestrian movements into and out of the site. Maintaining the surface parking continues to prioritize vehicle movements and requires people to walk through parked cars to get to public streets and sidewalks.



Figure 7: Proposed Rendering from Wonderland & Viscount

The built form and site design is not achieving basic design principles such as screening parking, bringing the built form to the street edge, facilitating pedestrian movements or providing amenity spaces and tree planting. Additionally, this proposed development did not attend the Urban Design Peer Review Panel (UDPRP) as it did not have sufficient level of detail to be reviewed. The UDPRP is comprised of industry experts that provide feedback on development proposals to improve the design and layout and would be beneficial for any future development. Substantial changes to the site design are required to facilitate a design outcome that appropriately accommodates new residents.

4.6 New Specific Area Policies

The proposed development is not within the identified use, intensity or form parameters contemplated by The London Plan, and requires a Specific Area Policy to allow for the proposed development. The London Plan identifies that Specific Area policies may be applied where the place type policies would not accurately reflect the intent of City Council with respect to a specific site or area. Criteria for evaluation of the adoption of policies for specific areas may be considered in limited circumstances where the following conditions identified in policy 1730_ apply:

- 1) The proposal meets all other policies of the Plan beyond those that the specific policy identifies.

The proposed development does not meet the policies of the City Structure Plan to maintain the Downtown as the primary office destination as the total amount of office space significantly exceeds what is permitted in the Shopping Area Place Type and can compete with the Downtown. The residential intensity proposed is directed to more strategic growth areas of the City such as the Downtown or Transit Villages, though some higher intensity residential development could be contemplated for this site, given its context and attributes.

- 2) The proposed policy does not have an adverse impact on the integrity of the place type policies or other relevant parts of this Plan.

The proposed amount of office gross floor area would have a negative impact on the Downtown Place Type as the creation of 30,000sqm of office space does not represent new demand and is instead representative of a migration of the existing demand from elsewhere in the City. The amount of high-rise residential development proposed is a departure from the intended vision for the Shopping Area, and may result in lower development demand in other more strategic parts of the City, like the south Transit Village.

- 3) The proposed use is sufficiently unique and distinctive such that it does not establish an argument for a similar exception on other properties in the area.

There are a number of similar sites across the City in the Shopping Area place type that could make a similar request including Sherwood Forest Mall located at Wonderland and Gainsborough, Pond Mills located at Highbury and Commissioners, Oxford and Hyde Park, Fanshawe and Hyde Park, and Northland Mall located at Huron and Highbury. The increased permission for suburban office space is a common request which has been consistently directed to the downtown. There is merit in allowing some additional development for the site, though permitting the full office and residential uses requested can set precedence for similar requests in the future.

- 4) The proposed use cannot be reasonably altered to conform to the policies of the place type.

The site is a large parcel of land containing an existing shopping centre and surface parking. There are a variety of different development options that the subject site could achieve. It is the opinion of staff that the site is capable of supporting development that completely conforms to the policies of the place type and The London Plan overall. The desire and benefits for higher density residential uses are acknowledged and some additional intensity for this site is justified as per the staff recommendation.

- 5) The proposed policy is in the public interest, and represents good planning.

The requested amendment does not conform to the Provincial Policy Statement or The London Plan and is not in the public interest or represent good planning.

The recommended amendment aligns with the overall intent of The London Plan City Structure Plan and place type policies, allows for redevelopment on an

opportunity site and represents good planning that is in the public interest. Further changes to the site layout and design refinements will be required as part the holding provisions and further planning act approvals.

4.7 Sanitary Capacity

Sewer engineering has identified that the requested density is above the population that was originally contemplated for this area and that there are significant wet weather flows in the existing Westmount Sanitary System and increase inflow and infiltration (I&I). There is no remaining capacity available for intensification above normal standards and policy.

The sanitary capacity brief needs to be revised to reflect additional tributary lands that were not included as well as increased wet weather flow values above standard design criteria in the Westmount system. A holding provision is recommended until adequate capacity can be demonstrated.

Additionally, there is an easement and sewer infrastructure located on the subject site that runs parallel to Wonderland Road South along the Wonderland frontage. The location of the sewer restricts development above it and is not scheduled for relocation.

4.8 Zoning By-Law

The requested amendment is not supported and recommended for refusal.

The alternative recommendation is to add the following zoning to the property to provide for flexible land uses and a mixed-use development form as follows:

holding Residential R5 Special Provision/Regional Shopping Area Special Provision (h-5*h-54*h-63*h-123*h-149*h-213*h-(_)*R5-7(_)/RSA2(_)) zone

This zone will allow the existing and additional commercial uses, as well as townhouses and stacked townhouses up to 3 storeys in height (9.0m).

holding Residential R8 Special Provision/Regional Shopping Area Special Provision (h-5*h-54*h-63*h-123*h-149*h-213*h-(_)*R8-4(_)/RSA2(_)) zone

This zone will allow the existing and additional commercial uses, as well as mid-rise apartment buildings and mixed-use apartment buildings up to 6 storeys in height.

a holding R9 Special Provision/Regional Shopping Area Special Provision (h-5*h-54*h-63*h-123*h-149*h-213*h-(_)*R9-7(_)*H36/RSA2(_)) zone

This zone will allow the existing and additional commercial uses, as well as mid-rise and high-rise apartment buildings and mixed-use apartment buildings up to 12 storeys in height.

Holding provisions are proposed as follows:

h-5: public site plan review

h-54: noise mitigation for residential along arterial

h-63: noise mitigation between residential and commercial

h-123: Urban Design Brief and review by the Urban Design Peer Review Panel

h-149: sanitary and stormwater servicing reports

h-213: sanitary servicing capacity and sewer outlet is available

h-(_): new holding provision to require a master plan be prepared to the City's satisfaction.

Conclusion

The requested amendment proposes an amount of office space that undermines the role of the Downtown as the primary office destination and has a level of residential intensity that would be more appropriate in a strategic growth area of the City. In the opinion of planning staff, the requested amendment is not consistent with the Provincial Policy Statement, 2020, does not conform to The London Plan.

The alternative recommendation provided by Staff supports growth and development of the site at a more moderate scale which would be more compatible with the surrounding area and the policy framework. The recommended amendment is consistent with the Provincial Policy Statement, 2020 and conforms to The London Plan, and facilitates the development of an underutilized site within the Built Area Boundary and Primary Transit Area with a use, intensity, and form that is appropriate for the lands and surrounding context.

The subject application was appealed for lack of decision made under section 17(40) of the Planning Act. Council may endorse or support a development proposal either as requested or as staff recommended, however is not able to approve or refuse the request.

Prepared by: **Sonia Wise, MCIP, RPP**
Senior Planner, Site Plans

Reviewed by: **Mike Corby, MCIP, RPP**
Manager, Planning Implementation

Recommended by: **Heather McNeely, MCIP, RPP**
Director, Planning and Development

Submitted by: **Scott Mathers MPA, P. Eng.**
**Deputy City Manager, Planning and Economic
Development**

cc:
Britt O'Hagan, Manager, Current Development
Michael Pease, Manager, Site Plans
Ismail Abushehada, Manager, Development Engineering

Appendix A

Bill No. (number to be inserted by Clerk's Office)
2023

By-law No. ~~C.P.-1284~~
A by-law to amend the Official Plan
relating to 755, 785 & 815 Wonderland
Road South.

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

1. Amendment No. (to be inserted by Clerk's Office) to the Official Plan, as contained in the text attached hereto and forming part of this by-law, is adopted.
2. This by-law shall come into effect in accordance with subsection 17(38) of the *Planning Act, R.S.O. 1990, c.P.13*.

PASSED in Open Council on

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading –
Second Reading –
Third Reading –

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

A. PURPOSE OF THIS AMENDMENT

The purpose of this Amendment is to add a policy to the Specific Policies for the Shopping Area Place Type and add the subject lands to Map 7 – Specific Policy Areas – of The London Plan, the City’s Official Plan, to permit an increased height of 12 storeys (36m) along Wonderland Road South and Viscount Road.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to lands located at 755, 785 and 815 Wonderland Road South in the City of London.

C. BASIS OF THE AMENDMENT

The recommended amendment is consistent with the Provincial Policy Statement, 2020 and conforms to the in-force policies of The London Plan, including but not limited to the Key Directions, Specific Area Policies and the Shopping Area Place Type. The recommended amendment will facilitate an expanded range of residential uses and mixed-use development in an existing settlement area.

D. THE AMENDMENT

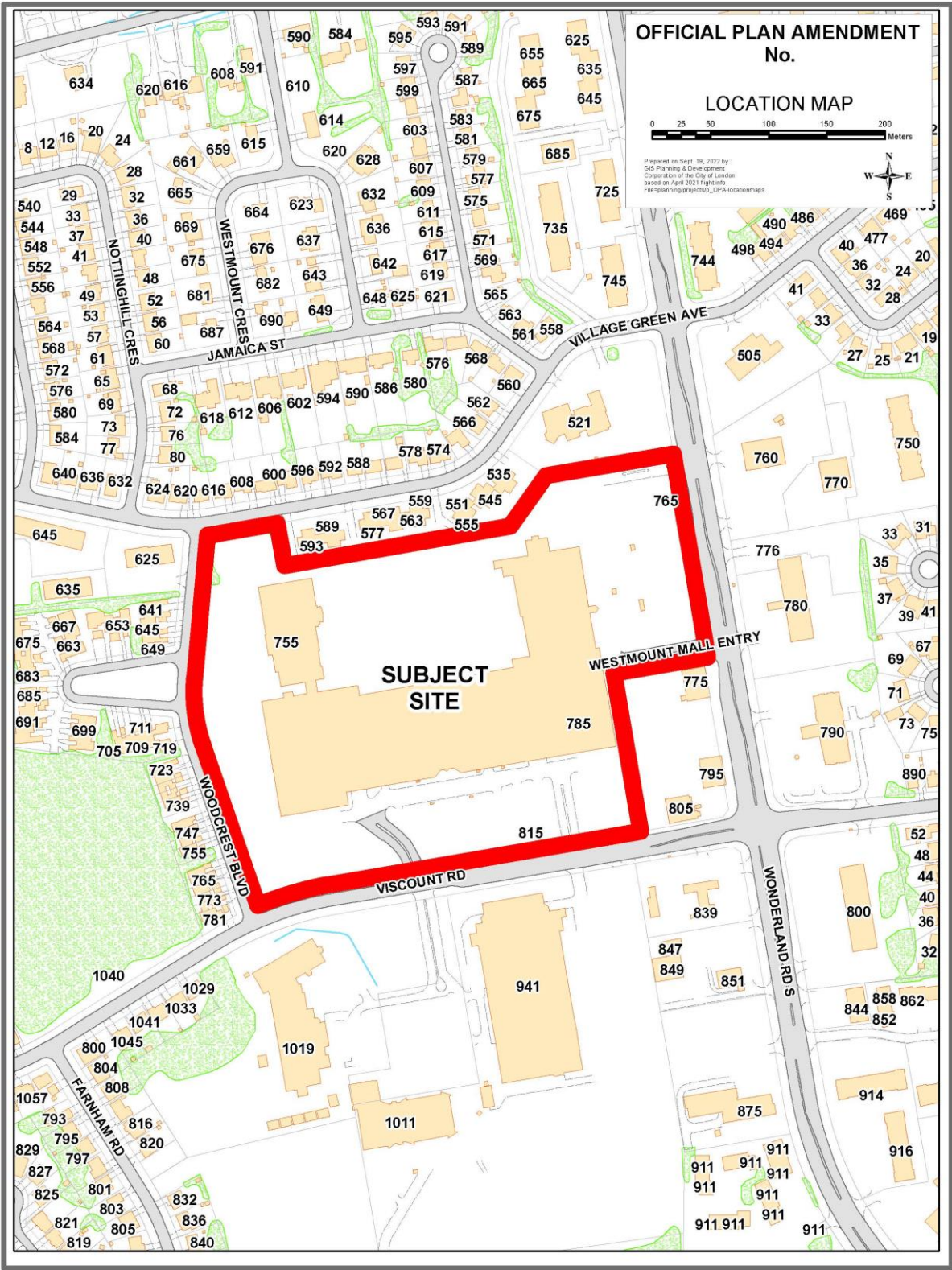
The Official Plan for the City of London is hereby amended as follows:

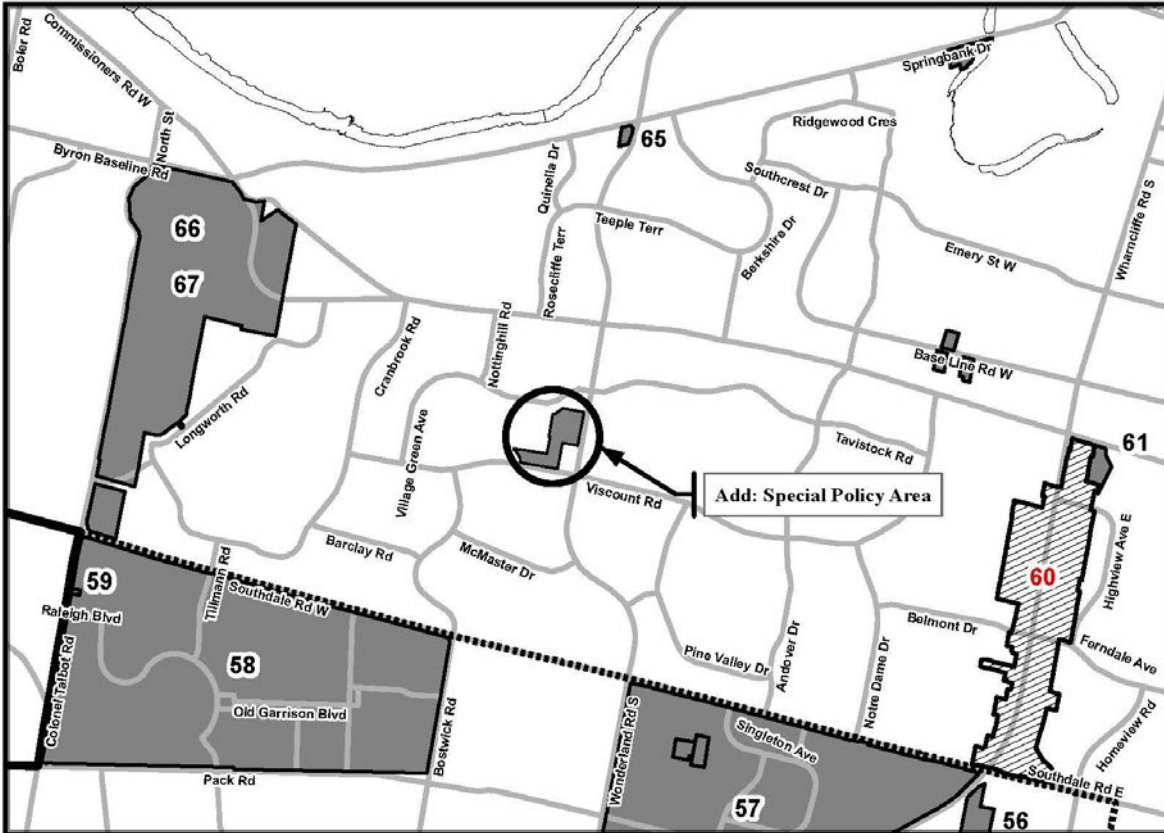
1. Specific Policies for the Shopping Area Place Type of The London Plan for the City of London is amended by adding the following:

755, 785 and 815 Wonderland Road South in the City of London

A maximum height of 12 storeys (36m) is permitted within 145m (475 ft) distance from Wonderland Road South; and 75m (246 ft) from Viscount Road: extending from Wonderland Road South to the South Westmount Mall Entry.

2. Map 7 – Specific Policy Areas, to The London Plan for the City of London Planning Area is amended by adding a Specific Policy Area for the lands located at 755, 785 and 815 Wonderland Road South in the City of London.



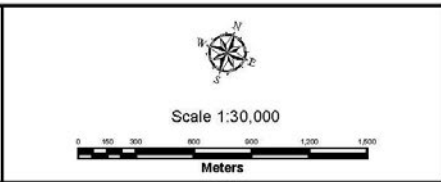


LEGEND	BASE MAP FEATURES
Specific Policies	Streets (See Map 3)
Rapid Transit and Urban Corridor Specific-Segment Policies	Railways
Near Campus Neighbourhood	Urban Growth Boundary
Secondary Plans	Water Courses/Ponds

This is an excerpt from the 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: Planning & Development



FILE NUMBER: OZ-9565
PLANNER: SW
TECHNICIAN: JI
DATE: 5/30/2023

Appendix B

Bill No. (number to be inserted by Clerk's Office)
2023

By-law No. Z.-1-23_____

A by-law to amend By-law No. Z.-1 to rezone an area of land located at 755, 785 and 815 Wonderland Road South.

WHEREAS 785 Wonderland Road Inc. has applied to rezone an area of land located at 755, 785 and 815 Wonderland Road South, as shown on the map attached to this by-law, as set out below;

AND WHEREAS upon approval of Official Plan (London Plan) Amendment Number (number to be inserted by Clerk's Office) this rezoning will conform to the Official Plan (The London Plan);

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 755, 785 and 815 Wonderland Road South, as shown on the attached map comprising part of Key Map No. A106, from a Regional Shopping Area Special Provision (RSA2(3)) Zone to a holding Residential R5 Special Provision/Regional Shopping Area Special Provision (h-5*h-54*h-63*h-123*h-149*h-213*h-()*R5-7()/RSA2()) zone; a holding Residential R8 Special Provision/Regional Shopping Area Special Provision (h-5*h-54*h-63*h-123*h-149*h-213*h-()*R8-4()/RSA2()) zone; and a holding R9 Special Provision/Regional Shopping Area Special Provision (h-5*h-54*h-63*h-123*h-149*h-213*h-()*R9-7()*H36/RSA2()) zone.

- 2) Section Number 3.8 2) Holding Zone Provisions is amended by adding the following new holding zone:

h-() Purpose: To ensure the orderly development of lands, a masterplan shall be prepared to the satisfaction of the City, to provide an organizational structure that establishes: pedestrian connections, vehicular connections, development parcels, landscaping and amenity areas.

Permitted Uses: Existing Uses

- 3) Section Number 9.4 of the Residential R5 (R5-6) Zone is amended by adding the following Special Provision:

R5-7() 755, 785 and 815 Wonderland Road South

a) Regulations

- i) Height 9.0 metres (39.3 feet)
(Maximum)

- 4) Section Number 12.4 of the Residential R8 (R8-4) Zone is amended by adding the following Special Provision:

R8-4() 755, 785 and 815 Wonderland Road South

a) Additional Permitted Use

- i) Cluster Townhouse Dwellings

- ii) Apartment buildings with any or all of the other permitted uses on the first floor.

b) Regulations

- i) Height 18.0 metres (59 feet)
(Maximum)

- 5) Section Number 13.4 of the Residential R9 (R9-7) Zone is amended by adding the following Special Provision:

R9-7() 755, 785 and 815 Wonderland Road South

a) Additional Permitted Use

- i) Cluster Townhouse Dwellings
- ii) Cluster Stacked Townhouse Dwellings
- iii) Apartment buildings with any or all of the other permitted uses on the first floor.

b) Regulations

- i) Height 36.0 metres (118 feet)
(Maximum)

- 4) Section Number 21.4 of the Regional Shopping Area Zone is amended by deleting and replacing the following Special Provision:

RSA2(3) 755, 785 and 815 Wonderland Road South

a) Additional Permitted Uses

- i) Commercial and Private Schools
- ii) Kennel
- iii) Craft Brewery
- iv) Artisan Workshop
- v) Automobile Sales Boutique
- vi) Business Service Establishment

b) Regulations

- i) Gross floor area for business 500sqm (5,382 sq ft)
Service Establishment Use
(Maximum)

The inclusion in this By-law of imperial measure along with metric measure is for the purpose of convenience only and the metric measure governs in case of any discrepancy between the two measures.

This By-law shall come into force and be deemed to come into force 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.

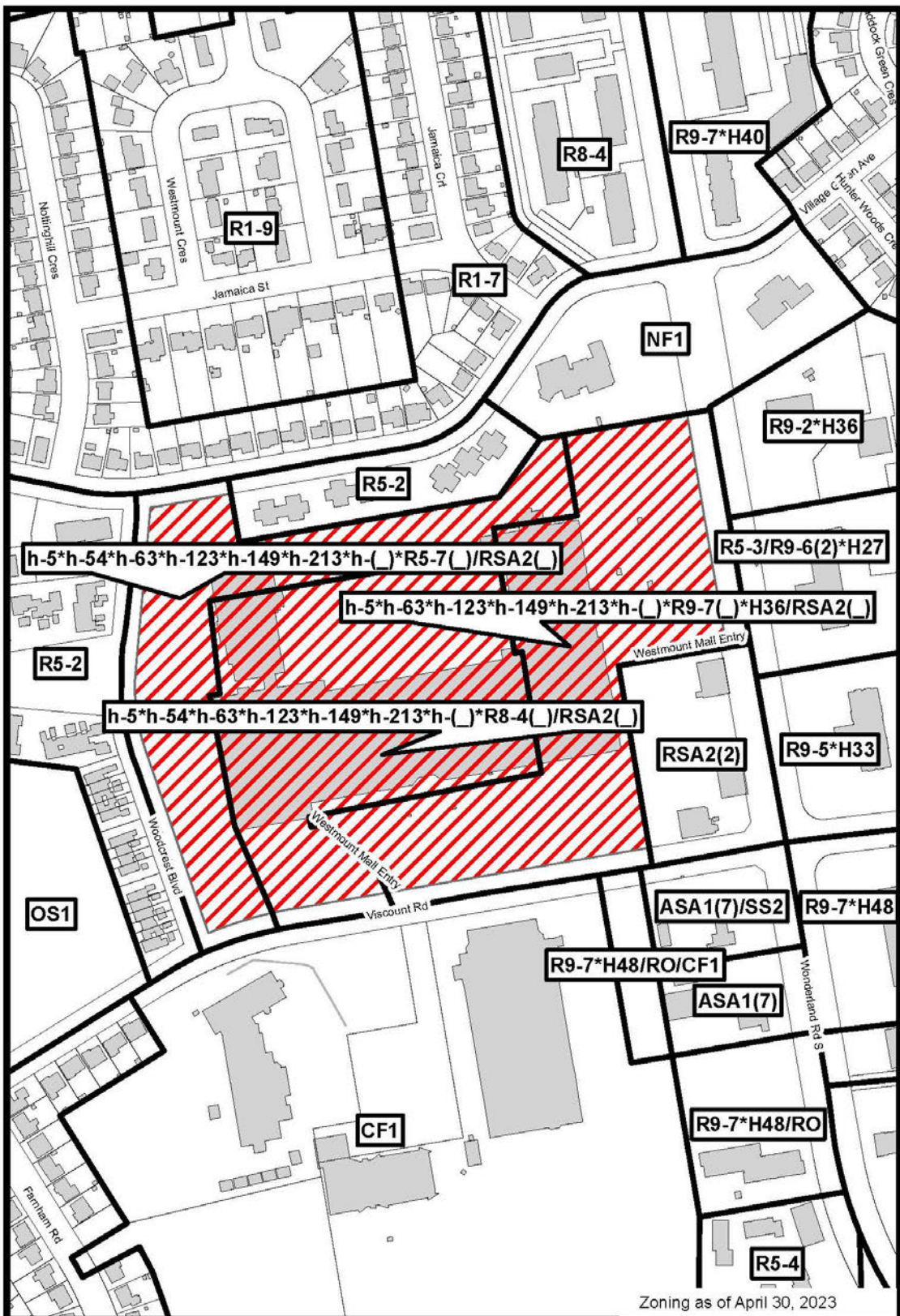
PASSED in Open Council on

Josh Morgan
Mayor


Michael Schulthess
City Clerk

First Reading –
Second Reading –
Third Reading –

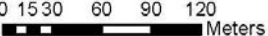
AMENDMENT TO SCHEDULE "A" (BY-LAW NO. Z.-1)




File Number: OZ-9565
 Planner: SW
 Date Prepared: 2023/5/10
 Technician: JI
 By-Law No: Z.-1-

SUBJECT SITE 

1:3,500

0 15 30 60 90 120 Meters 



Appendix C – Public Engagement

Community Engagement

Notice of Application: On December 7, 2022, Notice of Application was sent to 644 property owners and tenants in the surrounding area. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on December 8, 2022. Three (3) “Planning Application” signs were also posted on the site.

There were 14 replies received.

Nature of Liaison: The purpose and effect of this Official Plan and zoning change is to permit a mixed-use redevelopment of an existing shopping centre. Possible amendment to the Official Plan to permit greater heights for apartment buildings of 16 storeys (65m), and a total of 40,000 square metres of office gross floor area. Possible change to Zoning By-law Z.-1 **FROM** a Regional Shopping Area Special Provision (RSA2(3)) **TO** a Residential R5/Residential R9/Regional Shopping Area Special Provision (R5-6/R9-7/RSA2(_)/H65/D130) Zone with a maximum height of 65m and density of 130 units per hectare, to permit the existing broad range of commercial and retail uses that are currently permitted in the Regional Shopping Area zone of: assembly halls; automotive uses, restricted; catalogue stores; clinics; commercial parking structures and/or lots; commercial recreation establishments; convenience service establishments; day care centres; duplicating shops; financial institutions; institutions; liquor, beer and wine stores; medical/dental offices; offices; patient testing centre laboratories; personal service establishments; private clubs; restaurants; retail stores; service and repair establishments; studios; supermarkets; taverns; taxi establishments; video rental establishments; place of entertainment; brewing on premises establishments; commercial and private schools; and kennel, as well as the additional uses of: business service establishment, automobile sales boutique, craft brewery, artisan workshop, a newly defined use of call centre proposed as “an establishment set up to handle large volume of phone calls, typically in support of other business operations such as but not limited to, marketing/surveying firms, and customer service operations.”; cluster townhouse dwellings, cluster stacked townhouse dwellings in the R5-6 zone, and apartment buildings, lodging house class 2, senior citizens apartment buildings, handicapped persons apartment buildings, continuum of care facilities in the R9-7 zone.

Responses: A summary of the various comments received include the following:

Concern for:

Use: Not well thought out x2, Should demolish mall and rebuilt x1, Construction nuisance (dust, noise, vehicles) x4, Disrupts neighbourhood x3, Damage to homes x2, Loss of home value x2, Built elsewhere x1 (Southdale Rd)

Intensity: Stress on city services (schools, servicing etc) x3, Too many units x1, Safety impacts, x3, Negative impacts to downtown office space, x4, Not consistent with the City Structure Plan x1, Office Needs Study should be peer reviewed x1

Form: noise x3, Should locate intensity towards Wonderland x1, Impact to birds of high rises x1, Loss of Sunlight x3, Loss of views x1

Traffic: Traffic congestion in area x7

Support for:

Support proposal, will curb sprawl x1, Exciting redevelopment opportunity x1

Written Comments

-----Original Message-----

From: Brianna Smith < >

Sent: Thursday, April 6, 2023 2:07 PM

To: Planning and Development <PlanDev@london.ca>

Subject: [EXTERNAL] OZ-9565

To who it may concern,

My family and I have recently moved into a sifton townhouse behind westmount mall on Village green Ave. We wanted to let you know that our neighbourhood opposes the redevelopment plan of the mall for several reasons.

The first being this new structure would tower over our homes. We would no longer have sun exposure and we'd be living in the shadow of a huge apartment building.

Our family recently moved from xx Huxley street where the exact same thing is happening. They turned our back yard into a loud, noisy, smoggy job site that we did not want to expose our children to. Had we have known of this redevelopment plan for the mall we would not have moved into our town house. I do not want our neighborhood exposed to any more exhaust fumes and dust than is already happening. This would be for YEARS. What sort of damage would this do to our health?

There would be increased traffic to an already congested intersection at commissioners and Wonderland.

Trying to find an affordable home was a struggle for our family. We were hoping to raise our children here for years. I hope we are not forced to move again.

Had any thought been put in to reducing the rent of the empty stores in the mall to attract businesses ? It is possible to revitalize the mall without building a huge monstrosity on top of it.

At the end of the day it usually comes down to money and unfortunately I do not have the means to fight this battle. I hope for once the little guy can have a say instead of development companies paying their way through the door.

Please think of the children.

Thanks for your time!

Brianna Smith

From: Paula Lombardi < >

Sent: Monday, January 9, 2023 4:20 PM

To: Wise, Sonia <swise@london.ca>

Cc: Scott Allen < >; Andrea Edward < >

Subject: [EXTERNAL] Comments Proposed Zoning By-law Amendment, City of London File: Z-9565

Good afternoon,

Please see letter attached.

Thank you,

Paula

File No. 872523

Sonia Wise
Planning &
Development City
of London, City
Hall 300 Dufferin
Avenue London,
ON N6B 1Z2
swise@london.ca

Attention: Sonia Wise, Planning & Development, City of London

**Re: Proposed Zoning By-law Amendment, City of London
File: Z-9565 785 Wonderland Road South c/o McCor
Management (East) Inc. Westmount Shopping Centre**

We act on behalf of Farhi Holdings Corporation (the “**Client**” or “**FHC**”) and have been retained to review and comment on the proposed zoning by-law amendment as it relates to the property identified as 785 Wonderland Road South (the “**Westmount Shopping Centre**”) to: (i) create a mixed-use redevelopment of an existing shopping centre with 898 residential units; (ii) provide 40,000 m² of office gross floor area; (iii) provide development for the surface parking lots and on top of the existing Westmount Shopping Centre; and (iv) provide for a broad range of residential, commercial, office and retail uses with the additional uses of business service establishment, automobile sales boutique, craft brewery, artisan workshop and a new proposed use for a call centre (the “**Proposed OP and ZBL Amendments**”).

We ask that the Planning and Environment Committee (“**PEC**”) receive and review these written preliminary comments when considering the Proposed OP and ZBL Amendments. FHC is submitting these comments for consideration by the City of London (the “**City**”).

We also enclose a letter from Scott Allen, MA, RPP, of MHBC, Planning Urban Design & Architecture, advising that taking into consideration the vacancy rate in the downtown core coupled with the magnitude of office space being proposed for Westmount Shopping Centre, it is critical that the City conduct a third party peer review of the methodology and findings of the Office Market Needs Analysis submitted in support of the Proposed OP and ZBL Amendments.

We further note that Westmount Shopping Centre may currently have approximately twice the permitted gross leasable floor area permitted under the City’s policies and plans to be allocated to office uses. In previous staff reports City staff have taken the position that the existing office space in Westmount Shopping Centre does not comply, and exceeds, what is permitted and/or planned for the area.

The London Plan and the numerous other plans, policies and City endorsed documents clearly support the continued protection of Downtown office space market including but not limited to the Community Improvement Plan and Core Area Action Plan. We refer the City to our Client’s comments submitted in response to application Z-9356 dated September 20, 2021.

The protection of the Downtown office market is consistent with the City’s policy framework requiring that any suburban office space be restricted to protect the important Downtown office market.

In light of these considerations, we seek that at a minimum the City conduct a third party review of the methodology and findings of the Office Market Needs Analysis submitted in support of the Proposed OP and ZBL Amendments.

The OP and ZBL Amendments do not align with the policy direction and permissions of the City’s applicable planning framework, fails to protect the Downtown Core Area and Downtown office market, and does not represent good planning.

We ask you to note that these are preliminary comments and further comments may be provided as more information becomes available. Please notify us of any and all public meetings, or meetings within the City relating to these applications.

We preserve our Client’s right to raise any additional issue that may arise upon further review and consideration. Should you have any questions or concerns, please do not hesitate to contact us.

Do not hesitate to contact us if you have any questions or wish to discuss this letter in

more detail. Yours very truly,
Siskinds LLP

e-signature

Per: Paula Lombardi

January 9, 2023

Paula Lombardi, Partner
Siskinds

Dear Ms. Lombardi:

RE: Official Plan and Zoning By-law Amendment Applications (City of London File: OZ-9565) McCor Management (East) Inc.

755-785 Wonderland Road South (Westmount Shopping Centre) Our File: 18159'P'

In response to your request, MHBC has conducted an initial assessment of materials submitted in conjunction with the above-referenced planning application pertaining to the Westmount Shopping Centre located at 755-785 Wonderland Road South (the "**Subject Lands**"). We have also had the opportunity to review the Notice of Planning Application issued for this proposal, dated December 7, 2022 (the "**Notice**").

As identified in the Notice, the intent of application OZ-9565 is to apply planning permissions to the Subject Lands allowing for a range of residential, commercial, office and retail uses. Notably, this application proposes to permit 40,000 m² of office space on the premises (gross floor area). The following outlines our preliminary comments relating to the Planning Application materials.

Application Review

It is our understanding that, generally, the applicant is seeking to redevelop the shopping centre for a mixed-use development, with the existing shopping centre being repurposed as the podium feature for a multi-tower configuration. As set out in Section 6.0 of the Planning Justification & Design Report (the "**PJDR**") prepared for this project by Zelinka Priamo Ltd., dated September 2022, the redevelopment plan would add approximately 20,000 m² of office gross floor area ("**GFA**") to the first level of the new buildings proposed for the Subject Lands (all measurements herein are approximations). Also, given the existing leased floor space arrangement, we understand that the shopping centre currently contains 20,000 m² of office space (with the conversion of existing shopping centre space on the second level). In relation to existing office tenants, Section 2.1 of the Westmount Shopping Centre – Office Market Needs Analysis report prepared for this proposal by urbanMetrics, dated August 29, 2022, states that, "Significant office tenants at Westmount include the City of London Realty Services, London Health Sciences Centre, and MPAC as existing major office tenants".

Section 8.1 of the PJDR prescribes that the proposed Official Plan Amendment ("**OPA**") being advanced for the Subject Lands would add a Specific Area permission to the applicable Shopping Area Place Type of The London Plan. This site-specific permission would allow for additional building height and, significantly, 40,000 m² of office GFA. By contrast, Policy 878_6 of this Official Plan prescribes that the total aggregate office space within the Place Type will not exceed 2,000m².

Section 8.2 of the PJDR and the Notice of Planning Application describe the Zoning By-law Amendment ("**ZBA**") proposed to implement the redevelopment project. Generally, this proposed amendment would rezone the Subject Lands from 'Regional Shopping Area Special Provision (RSA2(3))' to a "Residential R5/Residential R9/Regional Shopping Area Special Provision (R5-6/R9- 7/RSA2(_)/H65/D130)" Zone. Respecting office uses, special permissions associated with this site-specific compound zone would allow for Business Service Establishment and Call Centre uses within the Subject

Lands. In relation to the proposed call centre use, the following is stated in Section 8.2 of the PJDR:

In response [to] a previous application proposing a Business Service

Establishment in order to secure a Call Centre tenant, there is a disagreement on how Call Centre should be interpreted under the OP policies and within the Zoning By-law. To provide some clarity to this, as part of this ZBA, 'Call Centre' would be added to the City of London Zoning By-law as a separate permitted use, and a new definition added to better facilitate future applications dealing with this type of use. (emphasis added)

It is further stated in this Section that the site-specific density permission of 130 units/ha (D130) accounts for the existing shopping centre space, the proposed residential units and the addition of 20,000 m² of office space.

In response to the previous application (City of London File: Z-9356), MHBC provided preliminary comments dated September 16, 2021, regarding an alternative development proposal pertaining to the Subject Lands. As identified in the City's Public Meeting Notice, dated September 1, 2021, the intent of that application Z-9356 was to either (1) add business service establishment as an additional permitted use to the existing RSA2(3) Zone or (2) increase the maximum 'cap' for office space in this zone. In effect, the intent of the previous application to increase the office space permissions for the Subject Lands reflects the more specific ZBA proposed as part of the current application.

Official Plan Considerations

As set out in our comments responding to application Z-9356, in our opinion The London Plan contains a number of policies that are intended to help sustain and enhance the vitality of the City's Downtown, and to reflect related objectives and guidance in London's Downtown Plan (Our Move Forward), the Downtown London Community Improvement Plan and the Core Area Action Plan. It is also our opinion that this direction is largely encapsulated in the following policies of The London Plan:

City Structure Plan:

128_ At the top of the hierarchy for these centres [*Downtown, Transit Village, Rapid Transit Corridor Place Types*], the Downtown will offer rich cultural opportunities and a wide variety of services that will be offered to those who live throughout the city as well as those living Downtown. With the exception of offices that are directly ancillary to industrial uses, our large office spaces will be directed to the Downtown to ensure its long- term health and vibrancy.

Downtown Place Type:

795_ Our Downtown will be the hub of our economy's business community, containing the city's largest office buildings and a complex blend of professional and business service functions that collectively create dynamic synergies. Our vibrant Downtown restaurants, entertainment venues, hotels, and convention centre facilities, combined with the highest- order communications infrastructure, will be attractive to those who work Downtown and those businesses that seek out the best and the brightest employees.

Relative to planned function, Policies 127 and 129 of the London Plan contrast the roles of the Shopping Area Place Type applied to the Westmount Shopping Centre with the Downtown, Transit Village, and Rapid Transit Corridor Place Types:

127_ Figure 14 illustrates our Downtown, Transit Villages, and Rapid Transit Corridors which will be economic engines for commerce, employment, and economic growth. These mixed- use centres will be planned to offer a wide array of amenities, services, and experiences. They will offer the highest level of communications infrastructure, smart city services, high- quality walking, cycling and transit environments, and will be

serviced by rapid transit. They will be planned to be highly supportive of small, medium and large-scale businesses and will be well connected to our major institutions.

129_Shopping Areas are also shown on Figure 14. These areas serve the regular needs of those who live near them as well as those who travel to them for goods and services. These centres may serve as community hubs to provide for a variety of non-commercial services as well.

The London Plan also prescribes two intensity policies relating to office space caps which, in our opinion, are intended to support the planned function of the Downtown and protect the Downtown office market:

799_14. Direct large-scale office developments, greater than 5,000m², to the Downtown to prevent the deterioration of the important Downtown office market while still allowing for a reasonable supply of office uses outside of the Downtown.

878_6. Total aggregate office uses will not exceed 2,000m² within a Shopping Area Place Type.

In light of this policy framework, in our opinion any proposal to permit exceed the 2,000 m² office space cap of the Shopping Area Place Type would specifically need to demonstrate the proposal would not undermine (1) the role of the Downtown Place Type within the City Structure Plan of The London Plan and/or (2) the vitality of the Downtown office market.

In this respect, Section 1.2 of the Office Market Needs Analysis sets out the purpose of the study:

This study is intended to provide a professional, third-party assessment of market need for the amount of office space being proposed as part of the re-development scheme. It sets out to answer the following questions:

Will the proposed development threaten the viability of the downtown office market?
Is there market demand for office space on the subject site?
Is there market demand for retail uses on the subject site?
What fiscal and employment benefits would the proposed development bring to the City of London?

Section 7.0 of the Office Market Needs Analysis sets out several conclusions identified through the associated market study, including the following relevant commentary:

Despite the current planning framework, there is a high office vacancy rate in the downtown core and low vacancy rate in the suburbs particularly for Class B and C space, indicating a higher demand for suburban office space, and weaker demand for core office space in these two space classes. However, there is high demand for Class A office space in the downtown core, with a lower vacancy rate and higher rents. As older and less desirable buildings (Class B and C) in the core are retrofitted or replaced, and as new class A office space is added to the core, vacancy rates in this area are likely to decline and rental rates rise. **At the same time, demand for class B and C office space in the suburbs indicates there is considerable demand for office space on the subject site.** (emphasis added)

Commentary

Given the potential significance of these findings and the magnitude of office space being proposed for the Westmount Shopping Centre, **in our opinion it is critical that the methodology and findings of the Office Market Needs Analysis be subject to a third-party peer review.** It is anticipated that a peer review will help to verify the potential impact of this proposal on the Downtown office market and, consequently, the planned function of the Downtown Place Type. Additionally, with consideration for commentary provided in Section 2.1 of Office Market Needs Analysis addressing existing office uses, the peer review may confirm if the existing inventory of office

tenants exceeds RSA2(3) Zone permissions (being a maximum of 10% of the total gross leasable floor area).

Summation

As stated in our commentary above, it is our recommendation that a peer review of the Office Market Needs Analysis be initiated by a qualified professional to assess study findings and to help inform the evaluation of the office space component of this OPA and ZBA application. Specifically, this peer review should verify whether the four guiding questions set out in that study have been adequately evaluated and if the associated conclusions can be substantiated.

We trust this information is of assistance. Should you have any questions pertaining to our comments, please do not hesitate to contact the undersigned.

Yours truly,

MHBC

Scott Allen,

From: Wendy Murray < >

Sent: Monday, January 9, 2023 10:28 PM

To: Wise, Sonia <swise@london.ca>; Van Meerbergen, Paul <pvanmeerbergen@london.ca>

Subject: [EXTERNAL] File: OZ-9565

Dear Sonia and Paul,

I am sending the following email on behalf of my mother Sandra Murray.

To Whom It May Concern,

My name is Sandra Murray and I have lived in London for almost 6 years. As a resident of the Sifton Properties building at , facing the Westmount Mall I am vehemently opposed to the proposed zoning change. I am concerned about the potential development at Westmount Mall with multiple towers of office and residential suites bringing in thousands of people to live and work into a community that currently has strained infrastructure.

Some of my concerns are as follows:

1. Wonderland Road is already congested with cars idling constantly.
2. Surrounding residential streets will undoubtedly become more congested as a result.
3. It will be dangerous for the children walking to and from school moving through these congested streets.
4. Some of the schools already have portables.
5. I was informed by my Landlord that the overflow of children residing in the proposed towers will be bused to Byron adding to the congestion.
6. The construction vehicles, the noise and the dust.
7. The views will be impeded and sunsets will no longer be visible (potentially losing 50% of current view)
8. Why would a project like this be proposed in the middle of a suburb when there are plenty of building expansion opportunities on Southdale Rd.?
9. With a large number of people working from home now who is going to rent the office spaces and could they end up empty?
10. We need our mall back with stores, not towers.

I urge you to please reconsider this zoning change proposal.

Sincerely,
Sandra Murray

Attention Sonia Wise Refile # 02-9565. Please give a copy of this letter to all the Councillors & the Mayor.

My name is Edward Slivinski. I live at [REDACTED] [REDACTED]. I am President of the Woodhurst Homeowners Association, representing fifteen (15) homeowners.

All of us are opposed to the zoning change. We are also opposed to the disaster the Westmount Mall Management wishes to impose on us. Our quiet RESIDENTIAL area does not want or need new construction. We enjoy the peace and quiet of our area. Our home was built in 1971. When the mall was expanded in 1989 for second level, due to the pile driving, there were cracks in the driveway & the foundation in all of the homes on our street.

Would you enjoy twenty (20) years of construction on your street? Who will be responsible for the construction damage to our homes? Do you enjoy the sunshine in the summer and winter? So do we. When 16 floors are added to the present mall, we will lose a large amount of our sunshine. We will be living in the shadows. What effect will the high rise building have on the amount of sunshine we receive.

Page 2

Think of all the birds that will die from crashing into the high rises. What other environmental impact will this have on our area? Will the sewer system be adequate and will we have sewer backups. Will we need to install sewer back up valves. Will the electrical system carry the load. This project is not meant for a quiet residential area. Whose will the value of our homes go? Down -

Mr. & Mrs. Edward Slivinski

From: Wendy Murray <>

Sent: Monday, January 9, 2023 2:06 PM

To: Wise, Sonia <swise@london.ca>; Van Meerbergen, Paul

<pvanmeerbergen@london.ca>

Subject: [EXTERNAL] File: OZ-9565

Hello Sonia and Paul,

My name is Wendy Murray and I have lived at in London, Ontario for nearly 18 years. When I moved to London with my husband we chose Westmount because my husband grew up here and we knew it was a well established quiet neighbourhood. We enjoyed being close to all amenities including a then bustling mall with several clothing stores, book store, grocery store, pharmacy, card store, food court, movie theatre, health food store, shoe repair, key cutting, etc.. Over the last 18 years we have watched the mall slowly deteriorate into a shell of its former existence. We spoke with store owners and heard the same story over and over again about the incredibly expensive rent that they could no longer afford. We worried for the future of the mall when Zeller's was closing and again when Target had to pull out of Canada. When Sears closed we thought the mall would surely try to encourage another anchor store to take its place, but were disappointed to see a clothing store move in. We wondered why they tore down part of the mall, including the food court, movie theatre and several stores, to build a parking lot. We couldn't understand why the upstairs stores were being rented to businesses instead of stores. This was not happening at White Oaks Mall or Masonville Mall, so it couldn't be an economic change; it was apparent to us that this was because of the mismanagement of the mall.

We feel that the proposed construction project at the mall is incredibly ambitious and could cause a great amount of disruption in our well established neighbourhood. We are sympathetic to the housing crisis in the city and certainly do not want to see an empty lot across the road, but we do not feel that this project is the best decision for the community. We understand that a project of this magnitude could breath new life into the mall, but with that comes a huge influx of people and traffic into an area that was not designed to support the load. The following is a small list of concerns we have if the project is allowed to move forward:

- current mall may need under pinning and footings - noise, dust, environmental impacts need consideration
- damage to homes - would the developer be responsible for costs or homeowners
- lose of value of our homes - if the zoning is approved no one will be able to sell their homes with a 20 - 30 year construction project in the front yard
- Wonderland Road is congested - could it handle the construction vehicles let alone the movement in and out of the neighbourhood with 900 residential units and 40,000 square meters of office space
- construction vehicles moving through the neighbourhood
- these towers will obstruct views and sunlight onto our street
- can our local schools handle the influx of new students - we already have some portables
- grocery stores, pharmacies, other resources
- traffic through our neighbourhood - our street is already a thoroughfare; it could be considerably worse
- children need to move safely through the neighbourhood - construction could be dangerous.
- we already have a large number of high density housing in this community
- office space of this nature belongs downtown not in a neighbourhood
- the number of vehicles and buses required to move this number of people will bring a lot of congestion into the community

We understand that a project of this magnitude has the potential to bring a great deal of income to the developer through rent and a great deal of income to the city through property taxes, but this money comes with a human impact that can be negative and may not be realized immediately.

If you would like me to expand on any of the above concerns please feel free to contact me at or at .

Thank you for your time and consideration.

Sincerely,
Wendy Murray

From: Robert Geerts < >

Sent: Monday, January 9, 2023 10:06 AM

To: Wise, Sonia <swise@london.ca>

Cc: pvanmeerbergen@london.ca

Subject: [EXTERNAL] Zoning By-law Amendment File: OZ: 9565 785 Wonderland Rd.

Good morning Ms. Wise,

We received the documentation for the revisions to the by-law for Westmount Mall Property. We live at 709 Woodcrest Blvd directly west of the mall property.

We have concerns about the large amount of proposed units for the land. With approximately 900 units proposed will come a large increase in automobile traffic. The Viscount Rd. is already congested with the three schools that are located on Viscount. The development on the back west side of the property would flow to the south Viscount access where the school entrances are. We would strongly oppose any access to Woodcrest Blvd from the mall property.

We are not opposed to development on this property but suggest the bulk of the development should be along Wonderland Rd. where access would stay on a major road and not congest the Viscount Rd. area. Nine hundred units are too much.

Robert Geerts/ Lynn Lariviere

January 9, 2023

Sonia Wise
Planning & Development, City of London,
300 Dufferin Ave, 6th Floor
London Ontario
N6A 4L9

Dear Sonia Wise,

On behalf of Downtown London, London Downtown Business Association board of directors, and our membership, we are not in support of Planning Application for Official Plan and Zoning By-law Amendments relating to the property located at 755- 785 Wonderland Road South (Westmount Shopping Centre) - File: OZ-9565; and their request to amend Zoning By-law No.Z.-1 to add a mixed-use redevelopment of an existing shopping centre that will include 40,000 square metres of office gross floor area for a broad range of commercial and office uses.

Downtown London continues to defend any zoning amendment requests that do not conform to the policies and the intent of the London Plan, and that are aimed at increasing the floor plate of employment-based offices in suburban areas beyond that set out in the City of London's By-law Z-1 regulations and guiding principles of the Official Plan.

We encourage City staff, Planning and Environment Committee and City Council not to support this application as it contravenes the London Plan, specifically where it makes references *DOWNTOWN/OUR VISION FOR THE DOWNTOWN PLACE TYPE 795_ Our Downtown will be the hub of our economy's business community, containing the city's largest office buildings and a complex blend of professional and business service function.* As such this policy establishes the Downtown as the primary location for the largest office buildings.

The alternative would have negative impacts on downtown's vacancy rate which was at 25.3% in Q3 2022 (CBRE Market Report). Allowing this office development outside of the downtown, would significantly impede the downtown's economic recovery postpandemic and lose any ground we have made in 2022 through efforts of Main Street London and LDBA's work with the City, LEDC, London Small Business Centre to fill core area vacancies through the Core Area Vacancy Pilot Program that was funded by the City through LCRN.

Sincerely,

Asaad Naeel

Barbara Maly

Cc.

Cllr. Lehman - Chair PEC

Mayor Morgan

Cllr. Ferreira

Cllr. Hillier

Cllr. Hopkins

Cllr. Lewis

January 4, 2023

Luc Corneli

ECCOR Management Inc.

Mr. Corneli : copy to **Sonia Wise**, London City Hall ; **Paul Van Meerbergen**, London City Hall

RE; WESTMOUNT MALL PLANNING APPLICATION , LONDON, ONTARIO

Mr. Corneli I am not too sure what exactly was in your coffee cup and the coffee cups of your executive board when you re-imagined The WESTMOUNT MALL. But I don't believe you were sitting at the corner of Viscount and Wonderland Roads/London. I am all in favour of building "up", in the city of London.....BUT.... This "visioning" is beyond the pale!!!

The land is too small to sustain such an amount of ADDED BUILDINGS/FOOT TRAFFIC/ AUTOMOBILE TRAFFIC. **Wonderland Road and Viscount Road would not be able to sustain the car traffic** – unless there will NOT be any automobiles! **WAS ANY THOUGHT GIVEN AS TO THE IMPLICATIONS OF THE INCREASE OF HUMAN BEINGS ON TRAFFIC/SCHOOLS/PUBLIC TRANSIT/WASTE MANAGEMENT/CITY INFRASTRUCTURE in your planning???????** I believe you REALLY need to do due diligence, and REPLANNING of your vision . The traffic on Wonderland Road, **currently**, is NOT sustainable for the amount of accelerated building that is occurring NOW in the city....because the city of London for THE PAST YEARS has NOT PLANNED for the future. There needs to be HUMAN IMPACT element to the planning. I know this is not going to be built tomorrow.....but ALL ELEMENTS NEED TO BE CONSIDERED....has ANYONE in your office studied that? PLAN DIFFERENTLY.

INVITATION: come join me for tea and "timmies" at 3:00 p.m. on any Monday thru Friday and we can look at your proposal from my apartment. Wonderful "bird's eye view".

Sincerely,

Ann Marie Richardson,

P.S. in "my day" if someone received written correspondence, a written reply was anticipated.

From: Bernadette Warren < >

Sent: Friday, January 6, 2023 10:28 AM

To: Wise, Sonia <swise@london.ca>

Subject: [EXTERNAL] Notice of Planning Application re File No. OZ-9565

Dear Ms. Wise:

I am in receipt of the above-noted Notice dated December 7, 2022.

My husband and I live near Westmount Mall. Our concerns are more toward the increased traffic that will be associated with the new residences being proposed. Wonderland Road is already a very busy road, and we hear sirens almost every day. How does the City plan on dealing with the increased traffic?

Thank you.

Yours truly,

Bernadette Warren

From: Shmuel Farhi < >
Sent: Thursday, January 5, 2023 3:39 PM
To: Wise, Sonia <swise@london.ca>
Cc: Marcello Vecchio < >; Samuel Rincon < >
Subject: [EXTERNAL] Comments regarding OZ-9565 (Westmount Mall)

Hello Sonia,

Please see attached our comments regarding OZ-9565 (Westmount Mall), with thanks.

Happy new year,

Shmuel Farhi / *President*
Farhi Holdings Corporation

6 January, 2023

Dear City Council,

Re: Opposition to OZ-9565 Office Space Re-Development

On behalf of Farhi Holdings Corporation, this letter is to ask City Council to deny the Official Plan and Zoning By-Law Amendment at 755-815 Wonderland Road South (also known as Westmount Mall), file reference OZ-9565.

The applicant is asking for the approval of 40,000 m2 of office space in the former suburban shopping centre. This is directly at odds with The London Plan: Our Move Forward, and also against numerous planning policies and strategies in the City.

Allowing this application to proceed will further erode London's economic core. The downtown of any city should be the driver of the community and as such, the core should maintain its status as the home of premium office space.

Previous City Councils and City staff concur with this notion, as demonstrated by the copious policies restricting the approval of large amounts of office space beyond the core.

We are requesting that City Council vote down this application, lest it create a dangerous precedent of ignoring pertinent policy that will continue to hollow out the core. In our direct experience, the core is already facing numerous issues that Council needs to prioritise.

Re-purposing failed malls and allowing medium- to large-scale new office space construction are primary issues that have been affecting the core negatively over the past several years.

Continued investment into our core is the most important mandate of Council in order to ensure its preservation. FHC will continue to work and believe in creating a vibrant and economically stable downtown in London, despite the continuing exodus of office space to the suburbs.

Sincerely,

Shmuel Farhi President

From: ghowie < >
Sent: Friday, December 30, 2022 2:15 PM
To: Van Meerbergen, Paul <pvanmeerbergen@london.ca>
Cc: Wise, Sonia <swise@london.ca>;
Subject: [EXTERNAL] Re: Notice of Rezoning and application File: OZ 9565

Dear Ms Wise, I'm writing to apposed the application of file oz - 9565, at 785 wonderland rd by McCor Management.
And apposed the planning to build at 785 wonderland rd as per above.
At present and currently the area is beyond all congestion, traffic is over run, the noise pollution is at all hours. This development would destroy our community.
Please add me to all out going correspondence regarding this matter as I'm apposed to this development. Thank you kindly for your time in review.
Regards;
George Howie

From: K < >
Sent: Tuesday, December 20, 2022 5:00 PM
To: Wise, Sonia <swise@london.ca>
Subject: [EXTERNAL] RE: File OZ-9565 Westmount Mall Redevelopment Application

Re:london.ca/planapps
Application:785 Wonderland Road Inc. c/c McCor Management9East) Inc.

This mall has been mostly vacant for years and should be totally torn down before any thought is given to redevelop this site.
This presents an opportunity to create something new and exciting on this land. A livable people place.
The plan, as submitted, is a half-hearted and silly attempt to keep some of the original mall intact with added-on clumps of buildings stacked on top of it.
This unsightly, unimaginative and poorly thought out plan would create a public eyesore for years to come.
London can do much better than this.

Kirk Lagren
London

From: Tony Kilcoyne < >
Sent: Saturday, December 10, 2022 7:49 AM
To: Wise, Sonia <swise@london.ca>; Van Meerbergen, Paul <pvanmeerbergen@london.ca>
Subject: [EXTERNAL] File OZ-9565

Dear Ms. Wise
I was heartened to see the proposed plan for development of 755-815 Wonderland Rd S.
The biggest threat facing humankind is Global Warming. Higher population density and preventing urban sprawl is but one way in helping to slow the rise of temperatures.
I am in full support of the plan and would advocate for far more high rises in the city.
Sincerely
Anthony Kilcoyne

Departmental and Agency Comments

London Hydro: December 12, 2022

Servicing the above proposal should present no foreseeable problems. Any new and/or relocation of existing infrastructure will be at the applicant's expense, maintaining safe clearances from L.H. infrastructure is mandatory. A blanket easement will be required.
Note: Transformation lead times are minimum 16 weeks. Contact Engineering Dept. to confirm requirements & availability.

London Hydro has no objection to this proposal or possible official plan and/or zoning amendment. However, London Hydro will require a blanket easement.

Heritage: December 12, 2022

Archaeological Assessment has been satisfied for this application

Urban Design: December 15, 2022

Please find UD comments for OZ-9565 below. The comments remain the same as those provided for the SPC.

- For an evaluation of the proposal, a masterplan of the site with the locations of the proposed road network, proposed blocks with concepts depicting massing, scale and height and site layout are required to understand how the proposal fits within the site context.
- The current proposal and conceptual master plan are not sufficiently detailed.
- The proposal should have regard for surrounding land uses (low-density residential, schools, places of worship etc.) and should ensure that it is well integrated with surrounding communities.
- Ensure that the renders and site plan are complementary. Several details that have been provided in the conceptual renders are missing from the masterplan.
- If a phased development approach is being undertaken, elaborate further on the phases. Phasing plans should ensure that the public realm network is built over time and expanded in each phase of development.
- Provide a full set of dimensioned elevations for all sides of the proposed buildings with materials and colours labelled. Further urban design comments will follow upon receipt of the elevations and masterplan.

Site Layout:

- The master plan should incorporate a grid/modified grid pattern [TLP 212_]
 - For the overall size of this site, provide a safe pedestrian and vehicular network with new streets, shared driveways, laneways and interior and exterior pedestrian connections to create appropriately scaled development blocks and encourage walkability within the mall site.
- Provide block sizes to support walkability and transit [TLP 217_], [TLP 218_]
 - Setback the podium portion above any proposed entrances to create a courtyard feel, break up the mass of the podium to enhance pedestrian comfort and safety.
- Provide buildings parallel to their respective street frontages [TLP 215_] [TLP 288_].
 - Reconfigure the site to ensure active built forms adjacent to Wonderland Road S and Viscount Road.
- Provide amenity space(s) that is of sufficient size for the number of units proposed [TLP 295_].
 - Amenity spaces are to be located centrally and connected with pedestrian walkways.
 - Ensure that any open spaces/parks that are privately owned publicly-accessible spaces (POPS) are safe and comfortable and provide appropriate pedestrian amenities.
- Propose an urban hardscape treatment along Wonderland Road S, Viscount Road, and Woodcrest Blvd.
 - New streets and internal driveways are to accommodate elements such as street trees and landscaping, patios, and amenities such as seating, lighting and bicycle parking.
- Locate parking underground or integrated within the building [TLP 275_]. Reduce the visual impact of parking through making efficient use of land, to provide for outdoor amenity space, and promote active uses on street-facing facades.
 - Screen any exposed surface parking while ensuring sightlines and pedestrian safety are maintained.

- Provide dedicated cycling facilities on site to connect to existing and future cycling infrastructure on the surrounding street network [TLP 255_].
- Reorganize the servicing on site to meet the standards for new and existing uses and to limit the impact on adjacent uses TLP 266_]. Consolidate and internalize servicing and loading where possible.

Building Design:

- Locate higher density forms towards Wonderland Road S. Provide for a gentle transition in height and density with townhouses located closer to the low-density residential neighbourhood north of Village Green Ave.
- Design the building(s) to have regard for its corner location. Building massing and articulation should address the intersection of Wonderland Road S and Viscount Road.
- Include active ground-floor uses such as the principal building entrance, lobbies, common amenity areas, commercial units, and residential units with direct access to the sidewalk along both street-facing elevations in order to activate the street edge.
 - Improve pedestrian access by providing pedestrian weather protection (canopies, overhangs), seating and landscape features.
 - Where retail is not appropriate or supportable, provide other active ground floor uses with glazing and entrances to support the public realm.
- Limit the tower portion of the building to a maximum floor-plate size of up to 750 square meters to reduce the overall massing of the building and the "slab-like" appearance of the towers [TLP 293_].
- Design the top or "cap" of the building so it integrates the mechanical and elevator penthouses into an architectural feature for the building that will add visual interest to the skyline [TLP 289_ 3], [TLP 296_].
- Articulate the ground floor and podium facades to provide depth and variation in the built form to enhance the pedestrian environment.
 - Provide a variation of durable, and tactile building materials such as different types of brick, wood with textures on the ground floor to provide defined separation of spaces and uses while also enhancing the pedestrian experience at walking speed for visual stimulation [TLP 301_], [TLP 302_].
- Provide a variety of window glazing along the Wonderland Road, Viscount Road and Woodcrest Blvd ground floor façades to alleviate the elongated blank wall and create visual interest and sightlines for sense of safety [TLP 803_ 3].
- Create an active and dynamic street wall that creates a streetscape that is safe and accommodating for pedestrians. Provide individual store fronts along Wonderland Rd and Viscount Rd with direct access to the city sidewalk. Use variation in material, awnings, signage, and lighting to create a human scale rhythm.

Parks: December 16, 2022

Parkland dedication is required in the form of cash in lieu, pursuant to By-law CP-9 and will be finalized at the time of site plan approval.

Realty Services: January 5, 2023 (review of Office Needs Analysis)

I have the following comments and I am not in agreement that such a large amount of new office space should be permitted at Westmount.

Westmount Mall has 496,000 square feet (46,000 square meters) and 40 % is leased for office - 198,400 square feet. This is already a large amount of office space and close to the maximum permitted through the London Plan.

Key Findings - Page 11- Major office uses are directed to the Downtown, and to a lesser degree to Transit Villages, while the subject site is currently designated as a Shopping Area. • The subject site shares many characteristics with Transit Villages, however the

high residential density in the proposed development would help support greater amounts of office space than in Transit Villages and help create a balanced complete community.

Comment – Major office uses should be directed to the Downtown as per policy and sustaining a health core. The subject site is not a transit village.

Page 15

The proposed re-development will include 14,558 m² (156,700 ft²) of newly built office space, in addition to the 25,442 m² (273,856 ft²) of office space that will be located in the existing Westmount Shopping Centre building.

Comment – that's 430,556 square feet of office space. This will compete with the downtown office vacancy.

Page 20

Overall, for all classes of office space, the downtown core has a vacancy rate of 25.9% in Q2 2022. For reference purposes, a vacancy rate of 8% to 10% is considered healthy in a normal market.

Comment – Permitting over 150,000 square feet of new office space outside the downtown core will not reduce the high and unnormal office vacancy in the downtown.

Page 22 – The CBRE data does not demonstrate a high demand for Class A space. As there is limited supply of Class A space, there is a low vacancy rate and the limited supply also creates a higher rental rate.

Other Comments:

- Urban Metrics Analysis has not considered the new residential development in the downtown core and correlating employee growth. More housing in the downtown core will create more employees.
- Analysis has not considered changes in retail consumer behaviour and affects on retail space with on-line shopping.

Upper Thames River Conservation Authority: January 9, 2023

No objections.

Development Services – Engineering: January 24, 2023

The City of London's Environmental and Engineering Services Department offers the following comments with respect to the aforementioned Re-zoning application:

Wastewater:

- This development is for approximately 900 residential units and a total of 57,000 sq m of commercial/office floor space on approximately an 11.3ha site known as Westmount Mall.

Sewer Engineering notes that the requested density is approximately 2.5 to 3 times above the population that was originally contemplated for this area and that there are significant wet weather flows in the existing Westmount sanitary system. As such, there is no remaining capacity available for intensifications above normal standards and policy - Sewer Engineering does not recommend zoning approval for the proposed development at this time.

Density will need to be revised to something that closely reflects original population allocated to the subject property. The sanitary capacity brief will also need to be revised to reflect additional tributary lands were not included and as well as increased wet weather flow values in the Westmount system.

Should additional clarification be required, Sewer Engineering is available for further discussion.

At minimum, a holding provision would be required until adequate capacity can be demonstrated.

The following items are to be considered during a future site plan application stage:

Water:

- Water Engineering have the no comments for the pre-application consultation for 755, 765, 785, & 815 Wonderland Road South as water servicing will remain unchanged.

Transportation:

- Presently the width from centerline for Wonderland Road South adjacent to this property is 18.288 m as shown on RP 979. Therefore a widening of 1.212m is required to attain 19.5m from c/l.
- Please note that all widenings will be save and except existing structures.
- Please note that a 6.0m x 6.0m daylight triangle may be required at the intersections of Village Green & Woodcrest Blvd, Viscount & Woodcrest Blvd.

Stormwater:

Specific comment for this site:

- As per that attached drawing No (4012),The lands are part of Westmount Subdivision Phase II – All the Stormwater management minor and major systems are to be consistent with the accepted SWM strategies of the accepted Subdivision. In addition, Consultant shall ensure compliance with the City of London, Design Specifications and Requirements Manual, Ministry of the Environment, Conservation & Parks (MECP) Guidelines and Recommendation, and the SWM criteria and targets for the Dingman Creek Subwatershed.
- The proposed land uses will trigger(s) the application of design requirements of Permanent Private Storm System (PPS) as approved by Council resolution on January 18, 2010. A standalone Operation and Maintenance manual document for the proposed SWM system is to be included as part of the system design and submitted to the City for review.
- IF the number of proposed/existing parking spaces exceeds 29, the owner shall be required to have a consulting Professional Engineer confirming how the water quality will be addressed to the standards of the Ministry of the Environment, Conservation and Parks (MECP) with a minimum of 80% TSS removal to the satisfaction of the City Engineer. Applicable options could include, but not be limited to the use of oil/grit separators.
- This site falls within the Dingman Subwatershed. As per section 6.3.2 of the Design Specifications & Requirements manual, a water balance assessment is required to examine the site's water balance conditions and propose opportunities to mitigate water balance deficits. As an objective of the Dingman EA, this new development is to achieve the water balance conditions identified from the predevelopment study. The approach for stormwater control hierarchy, and LID design, is included in the Section 6 Stormwater Management of the Design Specifications & Requirements manual. The water balance analysis may be completed as part of a Hydrogeological Assessment, a stormwater management report, or as a standalone document
- Additionally, the consultant is expected to incorporate green space reserved for LID in efforts to achieve this requirement.
- The Consultant may note that implementation of infiltration or filtration measures for a volume that meets or exceeds the 25mm event as part of the water balance target would be accepted to meet Total Suspended Solids (TSS) reduction target.

- As per 9.4.1 of The Design Specifications & Requirements Manual (DSRM), all multi-family, commercial and institutional block drainage is to be self-contained. The owner is required to provide a lot grading plan for stormwater flows and major overland flows on site and ensure that stormwater flows are self-contained on site, up to the 100 year event and safely convey the 250 year storm event.

General comments for sites within Dingman Creek Subwatershed:

- The subject lands are located in the Dingman Subwatershed. The Owner shall provide a Storm/Drainage Servicing Report demonstrating compliance with the SWM criteria and environmental targets identified in the Dingman Subwatershed Study that may include but not be limited to, runoff volume control, quantity/quality control (80% TSS), erosion, stream morphology, etc.
- The Owner agrees to promote the implementation of SWM Best Management Practices (BMP's) within the plan, including Low Impact Development (LID) where possible, to the satisfaction of the City Engineer.
- The owner is required to provide a lot grading plan for stormwater flows and major overland flows on site and ensure that stormwater flows are self-contained on site, up to the 100 year event and safely conveys up to the 250 year storm event, all to be designed by a Professional Engineer for review.
- The Owner shall allow for conveyance of overland flows from external drainage areas that naturally drain by topography through the subject lands.
- Stormwater run-off from the subject lands shall not cause any adverse effects to adjacent or downstream lands.
- An erosion/sediment control plan that will identify all erosion and sediment control measures for the subject site shall be prepared to the specification and satisfaction of the City Engineer and shall be in accordance with City of London and MECP (formerly MOECC) standards and requirements. This plan is to include measures to be used during all phases of construction. These measures shall be identified in the Storm/Drainage Servicing Report.

Appendix D –Evaluation of Our Tools

Evaluation of Our Tools Planning and Development Applications (1578)

An evaluation of the criteria related to potential impacts in the area and how the proposed development fits within its context according to the considerations found in 1578. 6) and 7).

Criteria	Response
<p>The height, location and spacing of any buildings in the proposed development, and any potential impacts on surrounding land uses:</p> <p>1578_6) g) privacy 1578_6) h) shadowing 1578_6) i) visual impact 1578_7) f) height 1578_7) g) density 1578_7) h) massing 1578_7) i) scale 1578_7) j) placement of buildings 1578_7) k) setback and step-back 1578_7) l) relationship to adjacent buildings</p>	<p>The requested amendment has minimal detail regarding the placement and impacts of proposed buildings and the effects on privacy, shadowing, visual impact and relationship to the adjacent buildings are not presently known.</p> <p>The recommended amendment permits the greatest height on site along the east boundary furthest from the existing residential neighbourhood, and along the higher order road.</p> <p>In an effort to encourage the new built form to occupy existing surface parking lots, mid-rise development potential is proposed along the Viscount road allowance and towards the centre of the site.</p> <p>The western and northern boundaries abut the low-rise residential uses which permit a reduced building height to provide a more compatible transition.</p>
<p>The extent to which the proposed development provides or retains any desirable vegetation or natural features that contribute to the visual character of the surrounding area:</p> <p>1578_6) k) trees and canopy cover 1578_6) m) natural heritage features and areas 1578_6) n) natural resources 1578_7) p) landscaping and trees</p>	<p>The subject site is an existing developed shopping centre comprised of buildings and surface parking areas. There is minimal on-site vegetation. Any development occurring where there are existing or boundary trees will require a tree preservation plan to ensure any desirable vegetation can be retained. A landscape plan will be required through the Site Plan Approval process and a masterplan will inform on-site amenity and green space.</p>
<p>The impact on the Transportation System and the adequacy of parking facilities:</p> <p>1578_6) a) traffic and access management 1578_7) q) coordination of access points and connections 1578_6) c) Parking on streets or adjacent properties</p>	<p>The site is currently accessed from Wonderland Road South and Viscount Road with no vehicular access from Village Green Avenue or Woodcrest Boulevard. The existing vehicular access are proposed to be retained and utilized. A comprehensive master plan will be required to identify new vehicular connections.</p> <p>A Transportation Impact Assessment (TIA) was provided as part of the application submission. Transportation staff endorse that the recommendations of the TIA be implemented.</p> <p>The proposed intensification on this site will support and benefit from the existing</p>

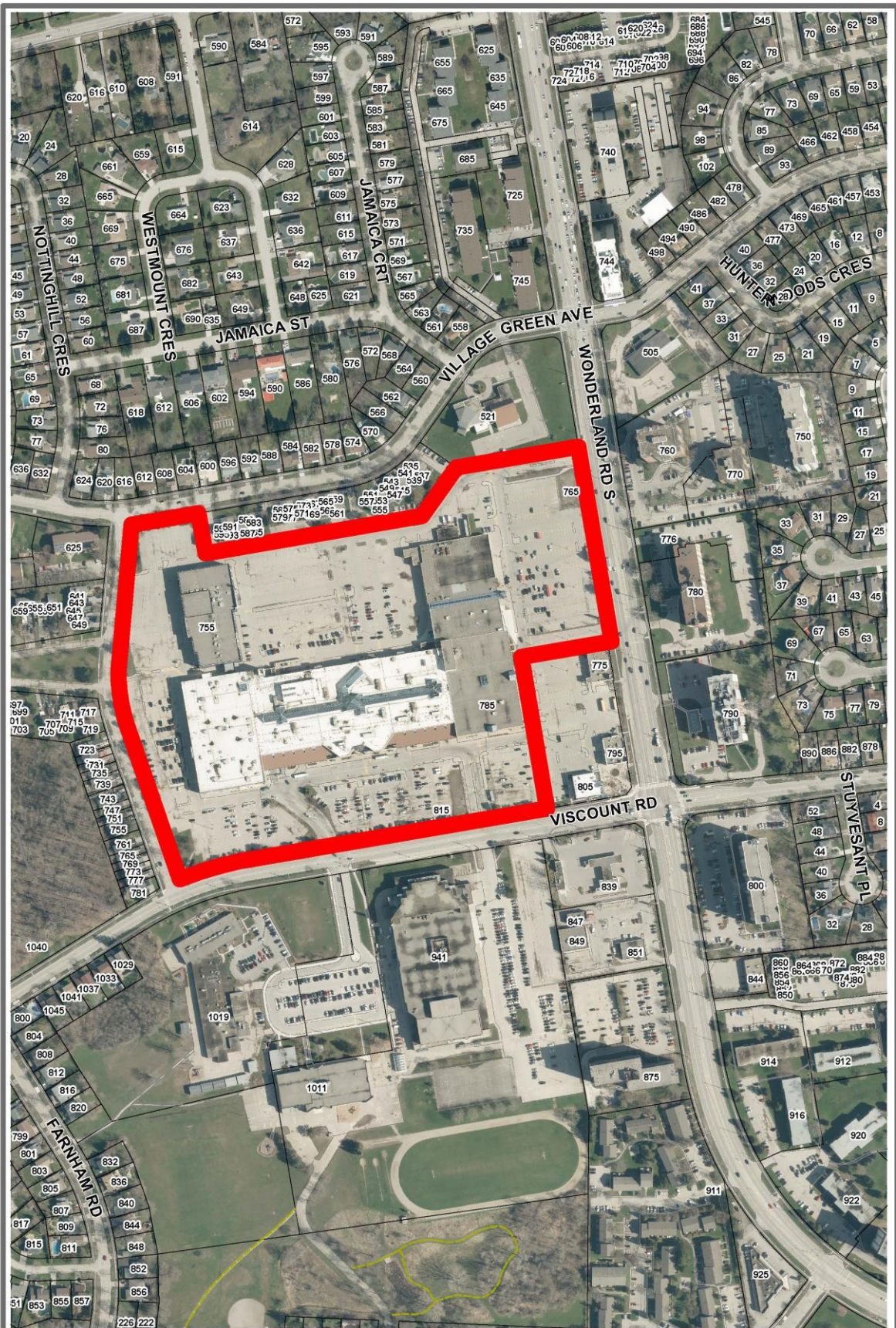
Criteria	Response
	transit services. There is a surplus of parking proposed on site and overflow parking on adjacent streets or properties is not anticipated.
<p>The exterior design in terms of the bulk, scale, and layout of buildings, and the integration of these uses with present and future land uses in the area:</p> <p>1578_7) c) neighbourhood character</p> <p>1578_7) d) streetscape character</p> <p>1578_7) e) street wall</p> <p>1578_7) m) proposed architectural attributes such as windows, doors and rooflines</p> <p>1578_7) n) materials</p>	<p>The proposed development did not contribute to a street wall or streetscape character and is not supported in its current form. The recommended zoning transitions height to the existing residential uses to complement neighbourhood character.</p> <p>A masterplan showing the extent of development blocks will establish a street wall and new built form along the street edge will establish and contribute to a streetscape character. Additional details regarding the urban design, materials and built form will be explored through the urban design peer review panel and Site Plan Review.</p>
<p>The impact of the development on heritage resources:</p> <p>1578_6) l) cultural heritage resources</p> <p>1578_7) o) relationship to cultural heritage resources on the site and adjacent to it</p>	<p>There are no heritage resources located on site and none in the surrounding area that would be impacted by the proposed development.</p> <p>An archaeological assessment has been prepared for the site which confirms no further works are required.</p>
<p>Constraints posed by the environment,:</p> <p>1578_6) b) Noise</p> <p>1578_6) d) emissions generated by the use such as odour, dust or other airborne emissions</p>	<p>The site is located along a major road (Wonderland Road South) which has potential noise impacts for future residents. Certain commercial uses may also generate noise and when residential uses are proposed in proximity may require mitigation. A noise impact study will be required as part of the Site Plan Approval process for road noise and a holding provision will require a study for noise impacts on future residential uses from commercial uses. Any mitigation measures will be implemented into the ultimate development agreement. No other environmental constraints have been identified.</p>
<p>1578_6) e) lighting</p> <p>1578_6) f) garbage generated by the use</p>	<p>The development will require Site Plan Approval and to comply with the requirements of the City's Site Plan Control By-law.</p> <p>Detailed functional aspects of lighting and garbage would be addressed as part of standard site plan review, and informed by an accepted master plan.</p>

Appendix E – Relevant Background

[Z-9356: PEC Report – September 20, 2021 – Staff Report to add call centre](#)

[O-9409/Z-9410: PEC Report – January 22, 2022 – Staff Report to add kennel use](#)

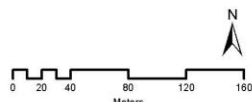
Appendix F – Relevant Background



LOCATION MAP

Address: 755-815 Wonderland Road South
 File Number: OZ-9565
 Planner: Sonia Wise
 Date: 2023/03/15

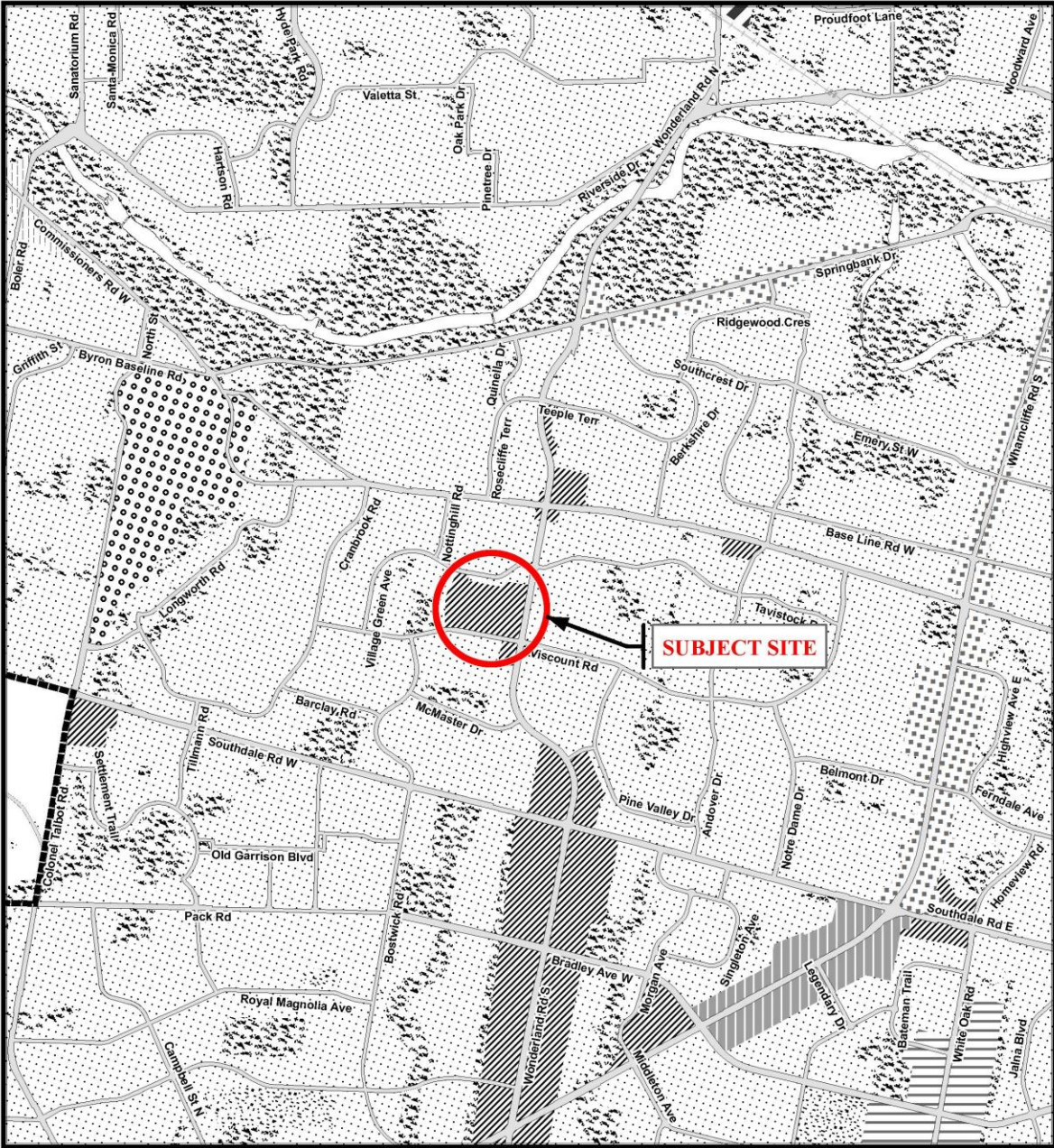
Corporation of the City of London
 Prepared By: Planning and Development



Scale 1:4000

Legend

Assessment Parcels



Legend

- | | | |
|------------------------|--------------------------|---|
| Downtown | Future Community Growth | Environmental Review |
| Transit Village | Heavy Industrial | Farmland |
| Shopping Area | Light Industrial | Rural Neighbourhood |
| Rapid Transit Corridor | Future Industrial Growth | Waste Management Resource Recovery Area |
| Urban Corridor | Commercial Industrial | Urban Growth Boundary |
| Main Street | Institutional | |
| Neighbourhood | Green Space | |

This is an excerpt from Planning & Development's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

CITY OF LONDON
Official Plan
LONDON PLAN MAP 1
- PLACE TYPES -
 PREPARED BY: Planning & Development

Scale 1:30,000

Meters

File Number: OZ-9565
Planner: SW
Technician: JI
Date: 2023/3/15

Appendix G – Climate Emergency

On April 23, 2019, Municipal Council declared a Climate Emergency. Through this declaration the City, is committed to reducing and mitigating Climate Change. The following are characteristics of the proposed Application that are related to the City's climate action objectives.

Infill and Intensification

Located within the Built Area Boundary: **Yes**
Located within the Primary Transit Area: **Partially**
Net density change: **Increase**
Net change in affordable housing units: **NA**

Reduce Auto-dependence

Proximity to the nearest London Transit stop: **On site interchange**
Completes gaps in the public sidewalk network: **NA**
Connection from the site to a public sidewalk: **Yes**
Connection from the site to a multi-use pathway: **Yes**
Site layout contributes to a walkable environment: **No**
Proximity to nearest dedicated cycling infrastructure: **200m (Viscount)**
Secured bike parking spaces: **TBD**
Secured bike parking ratio: **TBD**
New electric vehicles charging stations: **Unknown**
Vehicle parking ratio: **approximately 1.7 : 1 based on residential equivalent**

Environmental Impacts

Net change in permeable surfaces: **TBD**
Net change in the number of trees: **Unknown**
Tree Protection Area: **No**
Landscape Plan considers and includes native and pollinator species: **TBD through site plan**
Loss of natural heritage features: **No**
Species at Risk Habitat loss: **No**
Minimum Environmental Management Guideline buffer met (Table 5-2 EMG, 2021): **NA**

Construction

Existing structures on site: **Yes**
Existing structures repurposed/adaptively reused: **Yes**
Green building features: **Unknown**
District energy system connection: **No**