

July 11, 2024

By email:

Chair Steve Lehman; Members of City of London Planning and Environment Committee
City of London
300 Dufferin Avenue
PO Box 5035
London, ON N6A 4L9

**Re: Official Plan Amendment/Zoning By-law Amendment Applications (OZ-9127)
1105 Wellington Road, London (White Oaks Mall)
White Oaks Shopping Centre Inc., c/o Westdell Development Corporation**

Dear Chair Lehman and Committee Members:

On behalf of the registered owner of 1105 Wellington Road, White Oaks Shopping Centre Inc., we have had the opportunity to review the Planning and Economic Development report ('Planning Staff report') relating to the above-referenced planning applications, as prepared for the Committee's July 16th meeting. In this report, City staff state general support for our proposed high-rise development with the primary exceptions of the requested maximum building height (32 storeys) and maximum residential density (750 units per hectare). As an alternative, City staff are recommending a maximum tower height of 27 storeys and a maximum density of 595 units/ha, with a number of site-specific zoning regulations relating to building design.

We respectfully disagree with the height and density permissions recommended in the Planning Staff report, as these modifications substantially reduce the number of units supplied by this project and detract from its overall viability. In response, for the Committee's consideration, we offer the following comments regarding the objectives, design direction and merits of our proposal.

Project Objectives

The high-rise design advanced through our planning applications was developed in consultation with our project team, and is intended to achieve the following core project objectives:

- Integrate high density residential units into an existing shopping centre to function cohesively within mall operations and support the intensification and vibrancy of the Wellington Road/Bradley Avenue development node ('Wellington/Bradley node').
- Promote a compact, efficient development to help broaden housing choice and housing supply within the White Oaks community.
- Design high-rise forms that will create a prominent visual presence and will be compatible with the surrounding development context.

Critical to our design approach is to promote an efficient, intensive design that would accommodate a range of apartment units to broaden housing choice and housing supply in White Oaks community, respond to market demand and support the City's BRT investment. The tower design advanced in response to these core objectives incorporates two residential towers containing 568 units and providing several apartment configurations to promote housing choice and respond to local market demand. Tower 1 (32 storeys) would be positioned adjacent to Bradley Avenue and Tower 2 (30 storeys) would be positioned to the southwest, with both towers located above a multi-level podium.

The Planning Staff report includes the conceptual site plan, architectural renderings and preliminary building elevations designed by Zedd Architecture, which collectively illustrate the proposed high-rise arrangement including the height transitions and podium features.

Project Merits

Through our project planning, several key merits were recognized with the proposed tower design and overall intensity, including the following:

- The project site is located within the Transit Village place type, which permits a broad range of land uses including intensive residential uses. The site is well suited for the proposed high-rise forms, given its physical characteristics, its location within a prominent development node, and its proximity to the arterial road network, public transit, active transportation routes, offices, schools, parks and residential neighbourhoods.
- The massing, orientation, and articulation of the contemporary high-rise towers are designed: to be compatible with surrounding land uses; to complement the local development context; and to promote compact, efficient development. The addition of 568 apartment units would broaden housing choice and housing supply within the White Oaks community.
- The slender point tower design is intended to limit shadow impacts and to minimize obstruction of views proximate to the site. Additionally, the podium elements of the building integrate elements to help enhance the pedestrian environment along the Bradley Avenue corridor.

Planning Staff Recommendation

In effect, the Official Plan and Zoning By-law Amendment recommendations set out in the Planning Staff report changes would:

1. Reduce the height of both Towers to a maximum of 27 storeys; decreasing the scale of development by eight (8) residential storeys between Towers 1 and 2.
2. Decrease the maximum density to 595 unit/ha; equating to a total yield of approximately 493 units. This represents a reduction of 75 apartment units relative to our design which proposes 685 units/ha.
3. Introduce additional zoning regulations that may constrain the design layout and thereby further reduce the overall intensity of the project.

From our perspective, the recommended Amendments do not support the core objectives of our tower design and may jeopardize the advancement of this project. In particular, the massing, orientation and articulation of the proposed high-rise towers was designed to be both compatible and complementary to surrounding development, and importantly, to promote compact, efficient development and to support

intensification within a designated Transit Village. The requested building height allows the proposed unit yield (568 units) to be contained within efficient tower forms while also accommodating amenity areas, apartment units and structured parking in pedestrian-oriented podiums. **In our opinion, reducing the building height and residential density would detract from the overall merits of our proposal.** Additionally, we do not agree with the City staff report that the revised zoning regulations would result in a project design that is more compatible with the local development context.

Our project team held an open house for this project on February 5, 2024 attended by approximately 50 members of the local community. Based on our discussions with attendees, the proposal was positively received by most in attendance. Notably, several members of the public identified that this project would help address the clear need for apartment units in the community. Attendees also noted that this location was appropriate given the availability of community amenities that support this residential use and that additional residents in the area would help support commercial uses in the mall.

Finally, we acknowledge concerns noted in the Planning Staff report relating to proposed building positioning, height transitions, pedestrian access and related considerations (e.g., landscaped buffering). We intend to explore these matters in more detail with City staff as our design is further refined and advanced through the Site Plan Approval process. We are confident that the project, as ultimately designed and constructed, will effectively integrate into both the White Oaks Mall site and the local community.

Requested Official Plan and Zoning By-law Amendments

In light of these considerations, **we wish to request that the Planning and Environment Committee support our applications and endorse a recommendation for approval to City Council permitting building heights of up to 32 storeys (115 m) and a residential density of up to 750 units/ha.** We have enclosed a draft recommendation to implement these planning applications, and we have included redlined draft Amendments for ease of reference. The redlined modifications to the Zoning By-law Amendment would implement our proposed tower layout.

Respectfully submitted,



Paul Kitson

Vice President, Planning and Development
Westdell Development Corporation

cc: C. Maton, pec@london.ca; City of London

Encl.

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of White Oaks Shopping Centre Inc.

- (a) the proposed by-law attached hereto as Appendix "A" BE INTRODUCED at the Municipal Council meeting on July 23, 2024 to amend the Official Plan, The London Plan, by ADDING a new policy to the Specific Policies for the Neighbourhoods Place Type and by ADDING the subject lands to Map 7 – Specific Policy Areas – of the Official Plan;
- (b) the proposed by-law attached hereto as Appendix "B" BE INTRODUCED at the Municipal Council meeting on July 23, 2024 to amend Zoning By-law No. Z.-1, in conformity with the Official Plan, The London Plan, as amended in part (a) above, to change the zoning of the subject property FROM Regional Shopping Area (RSA4) Zone TO a Regional Shopping Area/Holding Residential R9 Special Provision (RSA4/h-248*R9-7()*H11596*D750595) Zone;
- (c) The Site Plan Approval Authority BE REQUESTED to consider the following design issues through the site plan process:
 - i) Provide an adequately sized rooftop outdoor amenity space ~~and centrally-located outdoor amenity space, either at-grade or rooftop, or a combination of both;~~
 - ii) Details regarding garbage storage and collection be determined;
 - iii) Details regarding the inclusion of a paratransit layby be determined.

Appendix A – Official Plan Amendment

Bill No. (number to be inserted by Clerk's Office)
2024

By-law No. C.P.-XXXX-____

A by-law to amend the Official Plan, The London Plan for the City of London, 2016 relating to 1105 Wellington Road

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, The London Plan for the City of London Planning Area – 2016, as contained in the text attached hereto and forming part of this by-law, is adopted.
2. This Amendment shall come into effect in accordance with subsection 17(27) or 17(27.1) of the *Planning Act, R.S.O. 1990, c.P.13*.

PASSED in Open Council on July 23, 2024 subject to the provisions of PART VI.1 of the *Municipal Act, 2001*.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – July 23, 2024
Second Reading – July 23, 2024
Third Reading – July 23, 2024

**AMENDMENT NO.
to the
OFFICIAL PLAN, THE LONDON 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 Transit Village Place Type and add the subject lands to Map 7 – Specific Policy Areas - of the City of London to permit a maximum building height of ~~32~~ 27 storeys, subject to the criteria for Specific Area Policies in the Our Tools part of this Plan.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to lands located at 1105 Wellington Road in the City of London.

C. BASIS OF THE AMENDMENT

The site-specific amendment would allow for apartment buildings with a maximum height of ~~32~~ 27 storeys on the subject lands. The recommended amendment is consistent with the *PPS 2020*, which supports densities for new housing which efficiently uses land, resources, infrastructure and public service facilities, and supports the use of active transportation and transit in areas where it exists or is to be developed. The recommended amendment conforms to *The London Plan*, including, but not limited to the evaluation criteria for Specific Policy Areas, the evaluation criteria for planning and development applications, and the Transit Village Place Type. The recommended amendment facilitates intensification of underutilized land with residential development at an appropriate scale and intensity within the Built Area Boundary and Primary Transit Area.

D. THE AMENDMENT

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

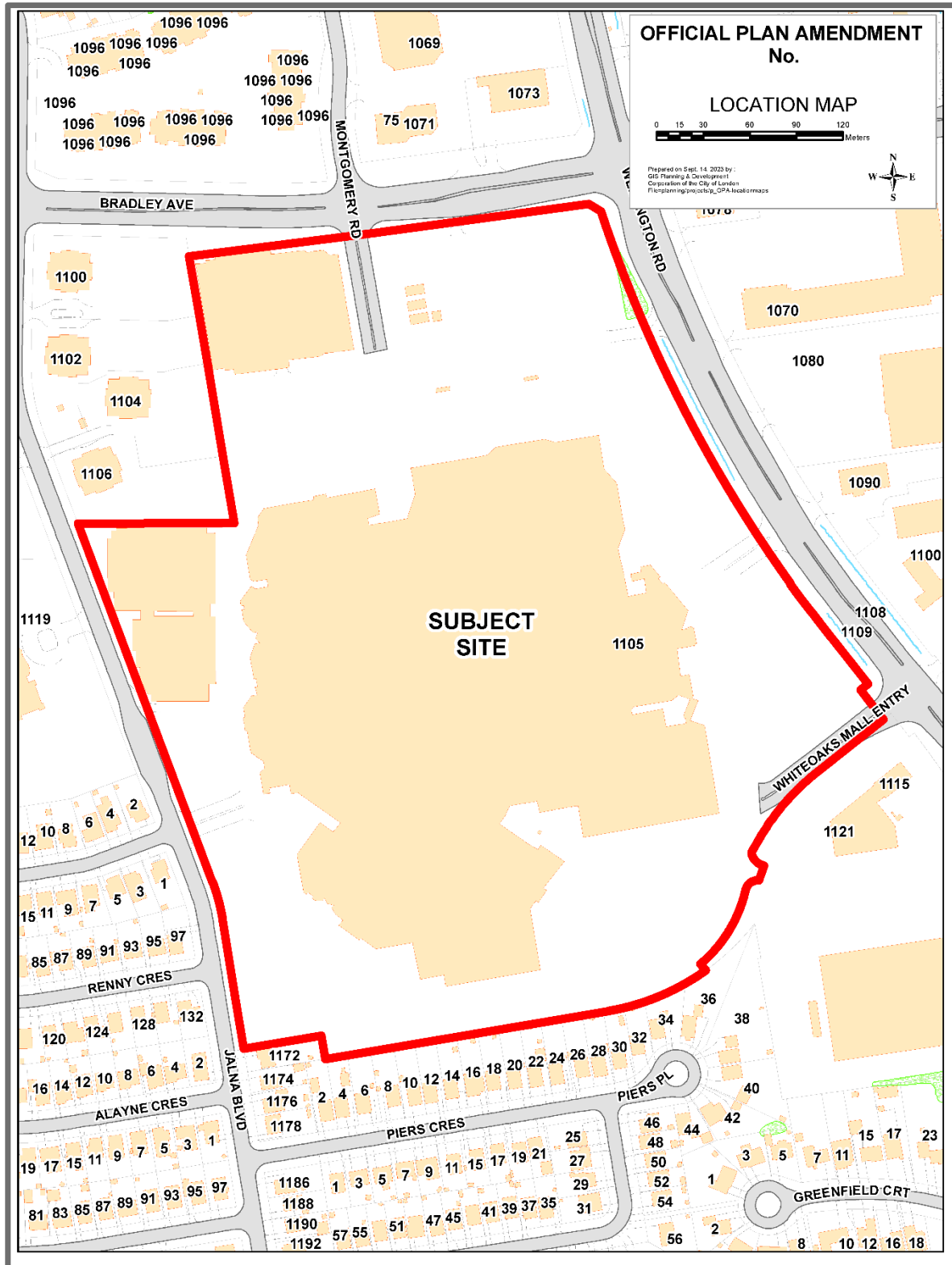
1. Specific Policies for the Transit Village Place Type of Official Plan, The London Plan, for the City of London is amended by adding the following:

() 1105 Wellington Road

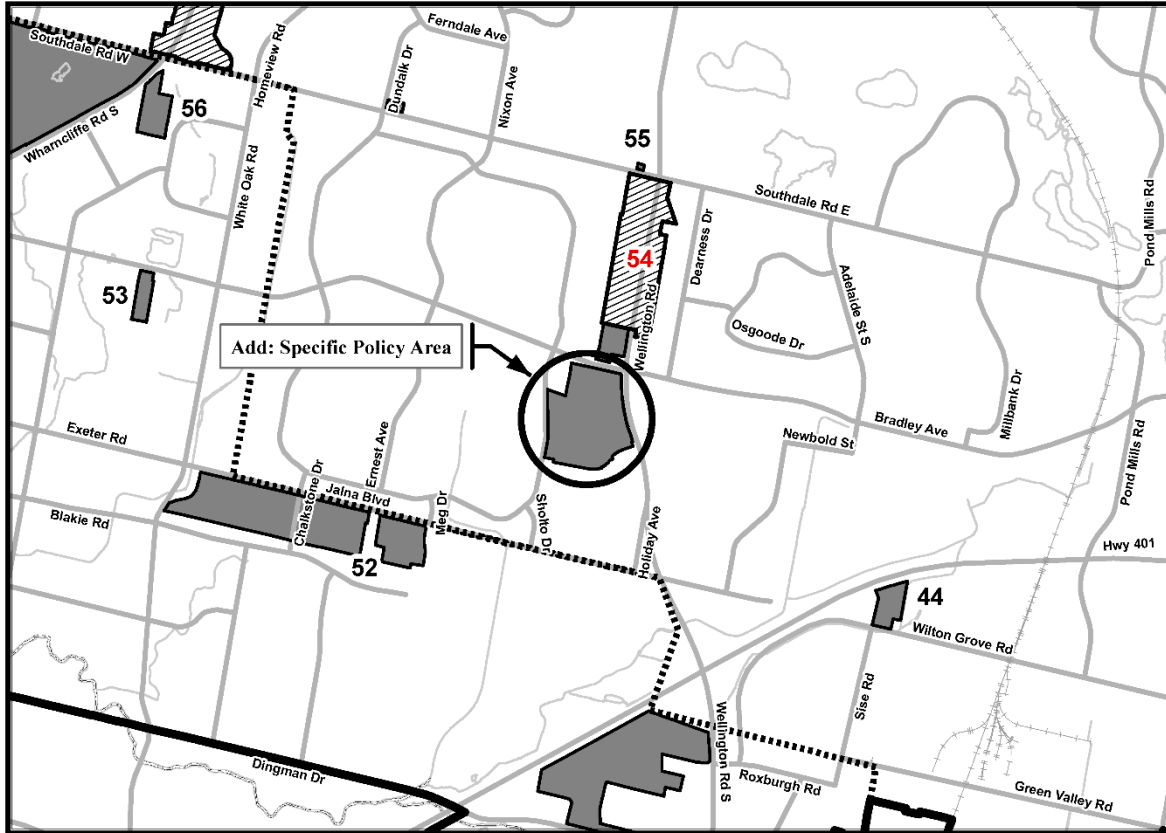
In the Transit Village Place Type at 1105 Wellington Road, one residential apartment building up to ~~32~~ 27 storeys in height may be permitted in addition to the existing permissions of the Transit Village Place Type.

2. Map 7 - Specific Policy Areas, to the Official Plan, The London Plan, for the City of London Planning Area is amended by adding a Specific Policy Area for the lands located at 1105 Wellington Road in the City of London, as indicated on “Schedule 1” attached hereto.

“Schedule 1”



AMENDMENT NO:



LEGEND

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

BASE MAP FEATURES

- Streets (See Map 3)
- Railways
- Urban Growth Boundary
- 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 1
TO**
OFFICIAL AMENDMENT NO. _____

PREPARED BY: Planning & Development



Scale 1:30,000



FILE NUMBER: OZ-9725

PLANNER: CM

TECHNICIAN: RC

DATE: 6/26/2024

Appendix B– Zoning By-law Amendment

Bill No. (number to be inserted by Clerk's Office)
2024

By-law No. Z.-1-_____

A by-law to amend By-law No. Z.-1 to rezone an area of land located at 1105 Wellington Road

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

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

1. Schedule "A" to By-law No. Z.-1 is amended by changing the zoning applicable to lands located at 1105 Wellington Road, as shown on the attached map **FROM** Regional Shopping Area (RSA4) Zone **TO** a Regional Shopping Area/Holding Residential R10 Special Provision (RSA4/h-248*R9-7(_)*H~~110~~⁹⁶*D~~750~~⁵⁹⁵) Zone.
2. Section Number 13.4g) of the Residential R9 (R9-7) Zone is amended by adding the following Special Provisions:

R9-7(_) 1105 Wellington Road

a. Additional Permitted Uses

- i. Notwithstanding the locational criteria for permitted uses in the RSA4 Zone, all uses of the RSA4 Zone shall be permitted on the ground floor of an apartment building

b. Regulations

- i. Front Yard Depth (Minimum) – 1.5 metres
- ii. Easterly Interior Side Yard Depth (Minimum) – 1.5 metres
- iii. Westerly Interior Side Yard Depth (Minimum) – **1.5** ~~4.5~~ metres
- iv. Rear Yard Depth (Minimum) – 7.5 metres
- v. Balcony Projections in All Yards (Maximum) – 0.0 metres to the lot line
- vi. Lot Coverage (Maximum) – 80%
- vii. Tower Floorplate (Maximum) 1,000.0 square metres
- viii. Stepback Above the 6th Storey **podium element** along Bradley Avenue (Minimum) – 3.0 metres
- ix. Stepback Above the 8th Storey **podium element** along Bradley Avenue (Minimum) – 7.0 metres for Tower 1 and 29.0 metres for Tower 2
- x. Tower Separation (Minimum) – 16.9 metres
- xi. Ground Floor Height (Minimum) – 4.0 metres
- xii. Building Height (Maximum) – **32** ~~27~~ storeys or **115** ~~96~~ metres, whichever is greater
- xiii. Density (Maximum) – **750** ~~595~~ units per hectare
- xiv. The principal building entrance for **Tower 1** shall be oriented to Bradley Avenue
- xv. Structured parking shall not be permitted within **6.0** ~~8.0~~ metres of the building façade facing Bradley Avenue

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

PASSED in Open Council on July 23, 2024 subject to the provisions of PART VI.1 of the *Municipal Act, 2001*.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – July 23, 2024
Second Reading – July 23, 2024
Third Reading – July 23, 2024