

Farhi Holdings Corp.

Heritage Impact Assessment 435-451 Ridout Street North London, Ontario

Prepared by:

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1	Oct 31, 2019	L. Smythe	Revisions per city's request
2	Nov. 28, 2019	A Grant	Revisions per city's request

Executive Summary

AECOM Canada Ltd. (AECOM) was contracted by Farhi Holdings Corp. to conduct a Heritage Impact Assessment (HIA) for a proposed development located at 435-451 Ridout Street North, in the City of London, Ontario. The study area consists of a single property that is comprised of several existing buildings and parking lots, as well as areas of manicured lawn located on historic Lot 16, Concession 1, in the Geographic Township of London, Middlesex County, now the City of London, Ontario (Figures 1 and 2). The property is now situated within its downtown context, adjacent to the Thames River.

The proposed development consists of a 4-storey parking structure along Queens Avenue, and a 40-storey apartment building with 5 floors of hotel to the north of the site along Ridout Street North, as one comprehensive development proposal. The proposed development would maintain the 3 existing heritage structures located on the property. The buildings are all located within a singular property, but for descriptive purposes, are described within this report as 435, 441, and 451 Ridout Street North. The property at 435-451 Ridout Street North includes various levels of heritage recognition and protection related to the 3 existing structures on the property (See Section 3 of this report). As a result, and as an outcome of the Pre-Application Consultation process, the City of London requires completion of an HIA as a part of the proposed development application.

The history of the subject properties is thoroughly documented in each of the respective designations and commemorations for the site. In addition, given that the buildings included on this property are some of the city's earliest landmarks, their role in London's history has been well-documented in published and un-published local histories. In order to avoid redundancy in reporting, the site histories described in the relevant designations and commemorations below were considered sufficient historic context for understanding for site's history as it relates to this report.

The subject property is designated under Part IV of the *Ontario Heritage Act*, and is also designated under Part V of the *Ontario Heritage Act* as a part of the Downtown London Heritage Conservation District. Lastly, the property is identified as a National Historic Site of Canada.

In order to mitigate the potential direct and indirect impacts to identified cultural heritage value described within this report, the mitigation strategies described in this report should be considered in further project refinements and approaches. Details related to the exterior design, the streetscape character, and the future re-use of the heritage structures should be considered in depth as a part of the proposed project in order to mitigate impacts, and conserve the cultural heritage value of the property.

Upon further design refinement, this HIA should be updated in order to capture any design alterations or changes that have been made to the proposed site plan or tower design to reflect the heritage conservation efforts as a part of the proposed development. Continued consultation with City of London Heritage Planning staff is encouraged as a follow-up step in order to ensure that the significant heritage attributes and cultural heritage value of the property will be conserved as a part of the proposed development. Due to the extensive cultural heritage value of this property, collaboration with Heritage Planning staff will ensure that the mitigation strategies will be appropriately identified and undertaken in order to preserve and enhance the heritage value of the site.

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1. Introduction

1.1 Study Purpose

AECOM Canada Ltd. (AECOM) was contracted by Farhi Holdings Corp. to conduct a Heritage Impact Assessment (HIA) for a proposed development located at 435-451 Ridout Street North, in the City of London, Ontario. The study area consists of a single property that is comprised of several existing buildings and parking lots, as well as areas of manicured lawn located on historic Lot 16, Concession 1, in the Geographic Township of London, Middlesex County, now the City of London, Ontario (Figures 1 and 2). The property is now situated within its downtown context, adjacent to the Thames River.

The proposed development consists of a 40-storey apartment building with 5 floors of hotel to the north of the site along Ridout Street North, as one comprehensive development proposal. The proposed development would maintain the 3 existing heritage structures located on the property. The buildings are all located within a singular property, but for descriptive purposes, are described within this report as 435, 441, and 451 Ridout Street North. The property at 435-451 Ridout Street North includes various levels of heritage recognition and protection related to the 3 existing structures on the property (See Section 3 of this report). As a result, and as an outcome of the Pre-Application Consultation process, the City of London requires completion of an HIA as a part of the proposed development application.

1.2 Study Method

The City of London does not have a specified Terms of Reference for the preparation of HIAs. As a result, the general tasks and processes identified in relevant Ministry of Tourism, Culture, and Sport (MTCS), and Provincial Policy Statement (PPS) guidance documents have been utilized in the preparation of this report.

This HIA was prepared according to the guidelines set out in the MTCS *Heritage Resources in the Land Use Planning Process* document included as a part of the *Ontario Heritage Toolkit*. For the purposes of this report, AECOM undertook the following tasks:

- 1) Review of appropriate legislative and planning framework;
- 2) Preparation of a historical context overview for the project area, including a review of the Downtown Heritage Conservation District Study and Plan, and review of the designating by-laws and recognitions for the properties described within this report;
- 3) A site investigation, undertaken on December 13, 2018, to document the existing conditions of the properties and their heritage attributes;
- 4) Identification and description of the proposed undertaking;
- 5) Assessment of impacts to identified cultural heritage value and heritage attributes;
- 6) Identification of potential mitigation strategies and preparation of recommendations to ensure the conservation of identified cultural heritage value.

1.3 Planning Act and Provincial Policy Statement

The *Planning Act* (1990) and the associated *Provincial Policy Statement* (2014) provide a legislative framework for land use planning in Ontario. Both documents identify matters of provincial interest, which include the conservation of significant features of architectural, cultural, historical, archaeological, or scientific interest. The *Planning Act* requires that all decisions affecting land use planning matters “shall be consistent with” the Provincial Policy Statement (PPS). In general, the PPS recognizes that Ontario’s long-term prosperity, environmental health, and social well-being depend on protecting natural heritage, water, agricultural, mineral, cultural heritage, and archaeological resources for their economic, environmental, and social benefits.

Section 2 of the *Planning Act* makes a series of provisions regarding cultural heritage. Section 2 of the *Planning Act* identifies various provincial interests that must be considered by the relevant authorities during the planning process. Specific to cultural heritage, Subsection 2(d) of the *Planning Act* states that, “The Minister, the council of a municipality, a local board, a planning board and the Municipal Board, in carrying out their responsibilities under this Act, shall have regard to, among other matters, matter of provincial interest such as...the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest.”

As one of 18 interests to be considered, cultural heritage resources are to be considered within the framework of varying provincial interests throughout the land use planning process.

Pursuant to Section 3 of the *Planning Act* the PPS 2014, Policy 2.6.1 states, “*Significant built heritage resources and significant cultural heritage landscapes shall be conserved.*”

1.4 Ontario Heritage Act

The *Ontario Heritage Act* enables municipalities and the province to designate individual properties and/or districts as being of cultural heritage value or interest. The province or municipality may also “list” a property, or include a property on a municipal register, that has not been designated but is believed to be of cultural heritage value or interest. *Ontario Regulation 9/06, Criteria for Determining Cultural Heritage Value or Interest* (O. Reg. 9/06) under the *Ontario Heritage Act* provides criteria for determining cultural heritage value or interest. If a property meets one or more of the following criteria it may be designated under Section 29 of the *Ontario Heritage Act*.

1.5 City of London Policies

1.5.1 The London Plan

The *London Plan* is the City’s new Official Plan. The *London Plan* sets out a new approach for planning in London which emphasizes growing inward and upward, so that the City can reduce the costs of growth, create walkable communities, revitalize urban neighbourhoods and business areas, protect farmlands, and reduce greenhouse gases and energy consumption. The plan sets out to conserve the City’s cultural heritage and protect environmental areas, hazard lands, and natural resources. The plan has been approved by the Ontario Ministry of Municipal Affairs.

Specifically related to heritage conservation, the *London Plan* outlines a number of policies related to the conservation of cultural heritage resources within the city. The General Cultural Heritage Policies related to Design note:

New development, redevelopment, and all civic works and projects on and adjacent to heritage designated properties and properties listed on the Register will be designed to protect the heritage attributes and character of those resources, to minimize visual and physical impact on these resources. A heritage impact assessment will be required for new development on and adjacent to heritage designated properties and properties listed on the Register to assess potential impacts, and explore alternative development approaches and mitigation measures to address any impact to the cultural heritage resource and its heritage attributes.

1.5.2 Inventory/Register

The City of London's Inventory of Heritage Resources (the Register) (2006) was adopted as the Register pursuant to Section 27 of the Ontario Heritage Act by Municipal Council on March 26, 2007. It includes information related to the listing of properties in London of recognized or potential cultural heritage value or interest. The Inventory (Register) includes a priority level system for identifying properties of greater priority and/or significance for heritage recognition. In addition, properties designated under the Ontario Heritage Act are maintained on the City's Inventory (the Register). The Inventory (Register) is a living document subject to changes and approvals by Council, advised by the London Advisory Committee on Heritage (LACH).

All three of the buildings are listed on the Register; however are also individually designated under Part IV of the *Ontario Heritage Act*. The properties are partially described within designating by-law L.S.P.-3330-152, registered July 5, 2001 as:

- 435 Ridout Street North; c.1836, style, Georgian; earliest commercial building in the City of London; Bank of Upper Canada-all restored elements including portico and fanlight over entryway;
- 441 Ridout Street North; c.1847; style, Georgian; Labatt Restoration-all restored elements including door and carriageway;
- 451 Ridout Street North; c.1855; style, Eclectic; Anderson House-rebuilt structure, all restored.

1.5.3 Downtown Heritage Conservation District

Heritage Conservation Districts are designated under Part V of the *Ontario Heritage Act* for the purpose of conserving cultural heritage values. The emphasis in a Heritage Conservation District is on the collective character of the overall area, as defined by its historic context, architecture, streets, landscape and other physical and visual features. HCDs are established to facilitate the preservation of a defined area with the intent of retaining critical functional and visual attributes that convey or have a historical relationship to the area in which they are situated. This includes buildings, natural and cultural landscapes, streetscapes, hardscape elements, and other features that contribute to an area's recognizable character.¹

The subject property is located within the boundaries of the Downtown Heritage Conservation District. The buildings which comprise the Downtown HCD each relate to one of five stages through which the Downtown evolved from its founding to the recent past. In the nineteenth and twentieth centuries the Downtown was the region's commercial, industrial, and service centre. There are approximately 400 properties in the Downtown HCD. The Downtown HCD was prepared by Stantec, in association with SJMA Architecture Inc., Michael Baker, and Sylvia Behr in March 2012,

¹ *Downtown London Heritage Conservation District Plan, 1.3.*

and was adopted by Municipal Council on April 11, 2012, and designated under Part V of the *Ontario Heritage Act* on June 18, 2013.

Blackfriars-Petersville Heritage Conservation District

The subject lands are also located in the vicinity of the Blackfriars-Petersville Heritage Conservation District, which can be viewed from the subject lands directly across the Thames River.

The Blackfriars-Petersville HCD was prepared by Golder Associates in association with the GSP Group, Tausky Heritage Consultants, and IBI Group and was adopted by Council on May 6, 2014 and designated under Part V of the Ontario Heritage Act on May 15, 2015.

1.5.4 Canadian Register of Historic Places

The Canadian Register of Historic Places (CRHP) is a list that formally recognizes the heritage value of historic properties by local, provincial, territorial and/or federal authorities. Federal, Provincial, and Territorial governments recognize the contribution historic places make to Canadian communities. The CRHP provides a single source of information for historic places recognized for their heritage value at the local, provincial, territorial, and national levels throughout Canada. The three buildings that are the subject of this HIA are included on the CRHP, listed as the "Ridout Street Complex National Historic Site of Canada".

1.5.5 National Historic Sites

National Historic Sites are places of profound importance to Canada. Through various listings, designations, and programs, Parks Canada maintains a list of sites throughout Canada that have been identified by the Historic Sites and Monuments Board of Canada (HSMBC) for their significance to Canadian history. The HSMBC advises the Government of Canada on the identification and commemoration of nationally significant aspects of Canada's history. Following thorough evaluations of a site, the Board and Minister of the Environment can declare a site, event, or person of national historic significance.

The subject property has been recognized as a National Historic Site of Canada, known as the Ridout Street Complex.

1.5.6 Canadian Heritage Rivers System

Located to the west of the subject property, the Thames River has been designated as a Canadian Heritage River. The Canadian Heritage Rivers System (CHRS) is a federal-provincial-territorial government program which gives national recognition to outstanding Canadian rivers, encourages their long-term management to conserve their natural, cultural, and recreational values. The CHRS program works with community-level river stewardship groups to promote and conserve these values. All conservation efforts on Canadian Heritage Rivers are voluntary, and dependant on existing laws and regulations.

Proponents of river nominations work directly with their provincial and territorial governments to research and prepare documents that are part of the nomination and designation process. The final step in the designation process is the approval of the relevant provincial or territorial Minister, and the approval of the Minister responsible for Parks Canada (the Minister of Environment and Climate Change). Founded in 1984, the CHRS currently has thirty-nine designated rivers, and one nominated river totalling over 10,000 kilometres of waterways.

2. Historical Research, Site Analysis, and Evaluation

2.1 Existing Conditions

The subject property consists of an irregularly shaped lot, approximately 3.3 acres in size, and is located on the west side of Ridout Street North just north of its intersection with Queens Avenue. The property includes the three heritage buildings described above, as well as existing surface parking lots located on the north, south, and west sides of the property. Immediately to the front of the heritage structures, Ridout Street North is a paved two-lane road with a left turning lane approaching Queens Avenue. Concrete sidewalks are located along the roadway, and concrete paving tiles are arranged immediately in front of the structures. Plantings, gardens, street trees, and heritage-influenced street lighting have also been installed in front of the structures.

The curvature of Queens Avenue immediately east and south of the subject property is a result of a significant road realignment that took place in the mid-1970s. Prior to then, Queens Avenue terminated at Ridout Street. As a part of a much larger plan to ease traffic in downtown London, beginning in 1949, the realignment of Queens Avenue was eventually approved by the City's traffic committee in 1970 after over twenty years of debate and property negotiations. Subsequently, the road was extended south of the subject property and carried over the Thames River on The Queen's Bridge, which was constructed in 1973.²

The subject property can be accessed from Ridout Street North, and from the surface parking lot accessed on the north side of Queens Avenue, as well as from the surface parking lot located west of the buildings. This parking lot can only be accessed by Harris Park Gate (which is further accessed by Dundas Street), or by Harris Park Entrance. A substantial topographical grade change is located between the east end of the property, where the buildings are located, and the west parking lot to the rear of the property. The west parking lot also includes a rear entrance to 451 Ridout Street North, through a much more modern three-storey addition that has been built onto the rear of the heritage structure. This addition has been constructed primarily along the topographically lower portion of the property and remains relatively hidden from street view along Ridout Street North, preserving an unobstructed view of the three heritage structures.

The subject property is also surrounded by properties and buildings of varying use and age. Immediately to the north, the property shares a boundary with 481 Ridout Street North, otherwise known as Eldon House, which includes a c.1834 residential dwelling, one of the oldest houses in London. Eldon House is surrounded by a naturalized landscape. Further north and west, the floodplains of the Thames River also include Harris Park, a public space, and the paved Thames Valley Parkway pedestrian/cyclist trail. South of the subject property, the Museum London building (421 Ridout Street North) is located between Queens Avenue and Dundas Street, and the Ontario Court of Justice building is located at 80 Dundas Street, on the southeast corner of Queens Avenue and Ridout Street North. Together, the Museum London property and the Ontario Court of Justice property provide a stark juxtaposition between the historic subject property and the much newer buildings on these properties. Within a broader context, the Middlesex Courthouse and Gaol, located at 399 Ridout Street North, is located immediately south of Museum London and includes more significant heritage structures. Collectively, the property and its surrounding context consist of a variety of historic and more modern forms of architecture.

² Footnote from LFP articles – see Queens Avenue article

2.2 Site History

2.2.1 Ridout Street Complex

The original town plot for London was laid out in 1826, and over time the town plot and surrounding downtown core have become a densely built-up area, containing structures and streetscapes which date back to the first half of the nineteenth-century. Prior to the 1850s, Ridout Street served as London's main street. Most traffic entering what is now the downtown core, did so from the north and west, by means of the Blackfriars and Westminster bridges. Between the 1830s and 1850s, the area around Ridout Street established itself as London's first financial district. Lured by the large amounts of money being spent by the soldiers of the local Garrison, many banks headquartered in Toronto and Hamilton set up branch offices in London. The building located at 435 Ridout Street is an example of one of these early bank buildings, having been constructed to house the Bank of Upper Canada circa 1838.

2.2.2 Eldon House and Harris Park

Eldon house is the oldest residence in the City of London. Now operated as a house museum, Eldon House was constructed in 1834 by Captain John Harris of the Royal navy, and named for Lord Eldon, the Lord Chancellor of England during the nineteenth century. Captain Harris was an admirer of Eldon and considered Eldon and himself to be "self-made" men. Captain Harris and his wife Amelia raised their family of ten at Eldon House; John Harris passed away in 1850. By the 1860s, only Captain Harris's son Edward resided in the house with his mother, and wife Sophia. Edward and Sophia decided to build a large addition to the house in the late 1870s; this included a formal dining room, a new kitchen, and more space for servants. A decade later, Edward faced financial difficulties and sold the property to his brother George. The house remained in the family for another two generations. George's wife Lucy received a large inheritance from her family in England, and the couple were able to make a number of improvements to the house and the grounds. These included the rebuilding of the terrace, and the introduction of electric lighting in 1896. The last family member to reside in the house was Amelia "Milly" Harris, who passed away in December of 1959. In January 1960, the house and property were donated to the City of London to be used as a museum by Milly's children. The house was opened as a museum in 1961.

Originally, the Harris property extended all the way to the banks of the Thames River. When the property was donated to the City of London, the flat land at the bottom of the hill beside the river was landscaped and became Harris Park, named for its original landowners.

2.2.3 Thames River

The Thames flows west 273 kilometres (170 mi)^[3] through southwestern Ontario, from the Town of Tavistock westward through the cities of Woodstock, London and Chatham to Lighthouse Cove on Lake St. Clair. Its drainage basin is 5,825 square kilometres (2,249 sq mi).^[3]

Known as Deshkan Ziibi ("Antler River") in Anishnaabemowin, the Ojibwe language spoken by Anishnaabe people, who together with the Iroquoian Neutrals have lived in the area since before Europeans arrived. In 1793, the river was renamed after the River Thames in England by Lieutenant Governor John Graves Simcoe.^[5]

Ontario's Thames River, is one of the most southern Canadian water courses, and has exerted a strong influence on both the natural features and the settled landscape within its watershed.

The Thames is a relatively small river on a Canadian scale but has unique natural heritage features. The Thames was one of the first rivers to form following the retreat of the Wisconsin Glacier from Ontario and the upper reaches still flow through these ancient spillways. The lower river reach, with its shallower gradient, emerged after thousands of years as a glacial lake.

With respect to its human heritage, the Thames River has provided the setting for 11,000 years of significant Indigenous and European settlement. The Thames, with its abundant fish and game, provided a focus for each group in the sequence of Indigenous peoples, including those who were the first to practise agriculture in Canada between 500 and 1650 A.D. In the 1700s, the river attracted French fur traders and European settlers, while still being used by Indigenous groups. During his visit to the area in 1793 Lieutenant Governor John Graves Simcoe designated the forks of the Thames River as the future site of the capital of Upper Canada. Although the initial plan to have London become the capital of Upper Canada did not come to fruition, it was chosen to become the seat of Upper Canada's London District.

Following the role of the Thames valley as a major theatre in the War of 1812, which included many battles and Tecumseh's death in the Battle of the Thames at Moraviantown, pioneer settlement within the watershed developed into Canada's first successful commercial agrarian society based on wheat. In turn, many of the numerous watermill sites provided the basis for industrial and urban development, including the major riverine cities, notably the early river port and ship building centre of Chatham, as well as London, Stratford and Woodstock, and a number of smaller towns and villages. Agriculture flourished during this time and the watershed has continued as the most prosperous farming landscape in Canada.

2.3 Ridout Street Complex

2.3.1 City of London – Part IV Designation

The subject property is designated under Part IV of the *Ontario Heritage Act*. The reasons for designation are described in By-law No. L.S.P.-3330-152 and are included below to inform this HIA.

Historical and Architectural Reasons

The buildings at 435 Ridout Street and 441-447 Ridout Street are the oldest commercial structures in the City. They are excellent examples of Georgian Commercial architecture. With 451 Ridout Street built for a residence they provide an important link between London's oldest home – Eldon house – and the old Middlesex Court House, now the Middlesex County building, the oldest building in the city.

435 Ridout Street – Georgian (c.1838)

This is the earliest commercial building in the City of London. This two-storey, white brick building rests on a stone foundation. It has parapet gables and an Adamesque doorway with side and upper fan lights and a classical porch.

Built in 1838, this building housed the bank of Upper Canada until its demise in 1866. James Hamilton managed the bank from 1856 to 1865 and then bought the building as a residence where he resided until his death in 1896.

Born in 1810 in London, England, Hamilton was the son of a British army officer. The family came to Canada in 1820. Hamilton started his career as a teller at the Bank of Upper Canada in Toronto before moving to London, Ontario.

James Hamilton was a father of four, a member of the St. Paul's Cathedral, and a Secretary-Treasurer of the Proof Line Road Company. This was the company that built the toll road between London and Lucan. However, Hamilton may be best known as a painter. Although he was more of a "Sunday painter" for much of his life, he devoted considerable time to art during his retirement. His earlier watercolours and oils depict the landscape of Toronto and area. Later works, generally in oil, portray London, Ontario and are an important source of information on London's early period. The J.J. Talman Regional Collection at the D.B. Weldon Library, University of Western Ontario and the London Regional Art and Historical Museums each have several examples of his work in their collections.

In 1970, the John Labatt Company carried out a thorough restoration and renovation of the then very dilapidated buildings. In the interest of structural solidity, the buildings were all placed on new foundations and the old floor structures were replaced by reinforced concrete. These alterations required the removal of the cooking fireplace in the basement of 435 Ridout Street North, though the andirons were retained in the collection of the London Historical Museum. Otherwise, an effort was made to restore both the exteriors and the interiors of the building, retaining the porches and the interior architectural fittings that the buildings had at the time of the restoration. Because the brick work at 451 Ridout Street North was badly deteriorated, the bricks were entirely removed on that building, and the walls rebuilt from the ground up. In keeping with the aim of restoring as much of the original material as possible, however, the outside faces of the building were almost entirely recovered with original bricks, though many were cut in half to achieve this result.

441-447 Ridout Street – Georgian (c.1847)

Actually two buildings, one with a central carriageway, this three storey, white brick structure had corbelled parapet walls. It also has a cornice with dentil work and doors with transoms.

The building was built by Dr. Alexander Anderson in c.1847. It was a home to both the Gore Bank and the Commercial Bank of Canada by the mid 1840's. It was also a popular residence for barristers like Richard Bayly and Thomas Westcott because of its proximity to the court house. The latter's daughters, the Misses Westcott, operated a private school in the structure between 1887 and 1919.

451 Ridout Street – Victorian Eclectic (c.1850)

The mansion, which initially held 23 rooms, has a Georgian arched doorway with side lights and a transom at its centre. On the second floor there is a narrower central entrance to the roof of the doorway porch. The building is three storeys in height, with mullioned windows on the third floor. The foundation is stone and the exterior walls are brick.

Dr. Alexander Anderson also built this building and used it as his own residence. He called it, "Wilmington House". He lived and practised medicine there until his death in 1873. His widow resided there until past the turn of the century.

Dr. Anderson was a surgeon in the Royal Navy before coming to Canada. He opened an office in London in December of 1835. Dr. Anderson was paradoxical mixture of the modern and the old fashioned. He was the first local doctor to be trained in both the arts and sciences, and many prominent local doctors did preliminary training under him. A notable example was John McLeay of Lobo. McLeay was with Sir John Franklin expeditions of 1819 and 1829. It was Dr. Anderson's wife who was convinced Anderson not to join up with ill-fated trip of 1845. Nonetheless, Dr. Anderson was certainly not a progressive in other matters. He reportedly disliked surgery and still employed bleeding as a technique. There is a record of his bleeding a son of Reverend William Proudfoot on November 14, 1836.

Dr. Anderson was equally divided in matters of religion. His father was a Presbyterian and his mother a Roman Catholic. Anderson was brought up Presbyterian but later converted to Catholicism. During his final illness, he had a change of heart when he realized that his Protestant wife would not be able to be buried beside him when she died. This upset the priest attending Dr. Anderson. In the end, a compromise was reached; a mass was said in St. Peter's Cathedral, and the internment followed by a Protestant cemetery. Bells tolled from the Episcopal and Roman Catholic churches, and all business in the City was suspended during the service.

After Mrs. Anderson's death, the house had a variety of uses. The Knights of Columbus renamed it Branden Hall when they acquired it in 1914. In 1917, a monastery was set up by the Sisters of the Precious Blood. Between 1920 and 1952, the Brothers of the Christian Schools of Ontario provided Catholic instruction at the high school level there.

Briefly it was again a single family dwelling. Then it was a Royal Canadian Legion Branch, and later the John Labatt Limited head office.

2.3.2 National Historic Site of Canada – Statement of Significance

The subject property has been recognized as a National Historic Site of Canada, known as the Ridout Street Complex. The following sub-sections include the Statement of Significance that was developed following the HSMBC evaluation of the property as a National Historic Site.

Description of Historic Place

The Ridout Street Complex National Historic Site of Canada is located in downtown London, Ontario, at the confluence of the north and south branches of the River Thames. The complex is comprised of a row of three distinguished, mid-19th-century residential and commercial buildings: the Anderson Residence, the Bank of Upper Canada building and the Gore Bank of Canada building. Their forms, materials, and details provide unity to the group, while their individual treatments and separate structure provide a varied streetscape. The designation refers to three buildings at 435, 44, and 451 Ridout Street North and their footprints as they existed at the time of designation (1966).

Heritage Value

The Ridout Street Complex was designated a National Historic Site of Canada in 1966 because:

- It provides a capsule view of the appearance of mid-19th century Ontario cities; and,
- It includes several of London's earliest residential and commercial building.

The heritage value of this site resides in the grouping of these representative examples of mid-19th-century urban architecture in southwestern Ontario. Ridout Street North was London's first financial district, where leaders in the fields of law, medicine, and finance established offices and homes. The street came to be known as "Banker's Row" after the establishment of the head offices of five banks, which were later turned into residences or business premises. The conservative classicized forms and the use of locally made buff-coloured brick are typical of the buildings in this area during the late-19th century.

Character-Defining Elements

Key elements contributing to the heritage value of the site include:

- Its location in downtown London, Ontario near the River Thames;
- The spatial relationship of the individual buildings, close to one another and to the street;
- The classically-inspired design evident in the refined proportions, rectangular massing, symmetry and restrained detailing of all three buildings;
- The brick and timber construction;
- The consistent exterior use of local buff-coloured brick;
- The symmetrically arranged facades with regular placement of multi-paned, double-hung windows; and
- Viewscapes on the complex as a whole from surrounding streets.

Key elements contributing to the heritage value of the Anderson Residence (No. 451) in the Ridout Complex include:

- Its monumental rectangular three-storey massing under a flat roof with a slight pitch to the rear and four end chimneys;
- Its Tudor-arched central doorway with sidelights, transom and paired double-hung windows framed by a brick surround, under a projecting portico;
- Its range of segmental headed windows on the third floor exterior surmounted by a decorative brick frieze;
- Any evidence of its original interior plan;
- Any surviving original interior detailing, furnishing and fittings, including: shutters, door and window trim, ceiling mouldings, cornices, mantelpieces, fireplaces, columns and brackets.

Key elements contributing to heritage value of the Gore Bank (No. 441) in the Ridout Complex include:

- Its three-storey massing as one integral structure split along the line of a carriageway approximately one third of the distance from the south end;
- The semi-elliptical carriageway entrance and the double hung windows corresponding with the openings adjacent to the carriageway;
- The placement and integrity of the chimneys, set above the bold cornice;
- Any surviving original interior features, including: mouldings, pilasters, panelled doors, balustrades, railings.

Key elements contributing to the heritage value of The Bank of Upper Canada (No. 435) in the Ridout Complex include:

- Its two-storey rectangular massing under a low-pitched gable roof with two end chimneys, plainly detailed eaves and side facades forming parapets;
- Its six-panelled central doorway with sidelights and an elaborate semi-elliptical fanlight; and,
- Any surviving original interior features that are associated with the heritage value of the complex, including quirk trim and corner blocks, mantelpieces, staircases, and fireplaces.

2.4 Eldon House – 481 Ridout St. North

Located at 481 Ridout Street (L.S.P.-2329-578; L.S.P.-3419-124;) and known as the Eldon House, the house was built-in 1834 and is designated under Section 29, Part IV of the Ontario Heritage Act, as well as listed on the Canadian Register of Historic Places.

Description of Historic Place

Eldon House is located at 481 Ridout Street North. This home is situated on the west side of Ridout Street and northwest of the termination of Fullarton Street. It is also on the southeast portion of Harris Park in the City of London. The property consists of a two-storey wood sided main house, constructed in 1834, as well as a coach house, a greenhouse and beautifully-landscaped grounds. The property also includes a one-storey wood clad interpretive centre built in 2003 that is not included in the designation.

The property was designated by the City of London in 1977 for its historic and/or architectural value or interest under Part IV of the Ontario Heritage Act (By-law L.S.P. – 2329-578).

Heritage Value

The beautifully landscaped Eldon House located on the southeast portion of Harris Park, is strategically situated within the area of the Forks of the Thames and illustrative of a grand estate.

Considered to be the most important heritage property in London, the first owner of Eldon House, John Harris, was the Treasurer of London District and a leading political figure in the local Family Compact. After Harris' death, his wife Amelia Ryerse, who was from the same prominent Ontario family as the Reverend Egerton Ryerson, the province's first Minister of Education, continued to occupy the home. Other significant owners were George Becher Harris, an important London lawyer, followed by his daughter, Amelia Archange Harris, who was the final inhabitant of the home before it was donated to the City of London in 1961. The residents who lived in Eldon House contributed significantly to its history through their individual personal and public achievements. The interior of the house retains original furnishings and artifacts used by the Harris family.

The Eldon House property is comprised of four buildings – a main house, a coach house, a greenhouse and a recently constructed Interpretive Centre. The main house was constructed in 1834 with additions made in 1878 and a series of extensive renovations followed. The Regency style main house is representative of the wealth and prominence of its owners the Harris family. Notable features of this style include the structure's overall symmetry, the enclosed verandah that spans the facade, the four brick chimneys and the bevelled wood cladding.

Sources: City of London, By-law L.S.P. – 2329-578;
Reasons for Designation, Heritage Property Manual, 1977.

Character-Defining Elements

Character defining elements that contribute to the heritage value include the:

- bevelled wood siding construction
- verandah which spans the façade
- three shuttered windows on the second-storey of the façade
- enclosed brick chimneys, including the three over the main building block and the one above the north wing
- 6 over 6 window in garage gable end
- round windows in the garage
- greenhouse, coach house
- siting of the property on the southeast corner of Harris Park
- grandeur of the estate, emphasized by landscaping and landscape features which include an arbour and fencing³

2.5 Register of Cultural Heritage Resources

The London Register of Cultural Heritage Resources evolved out of the first inventory of heritage resources which was adopted by Council in 1991. The inventory was officially adopted its entirety as a Register pursuant to Section 27 of the Ontario Heritage Act on March 26, 2007. Since that time Council has removed and added properties to the Register by resolution.

³ National Register of Historic Places: 481 Rideout Street, City of London, Ontario, N6A, Canada
<https://www.historicplaces.ca/en/rep-reg/place-lieu.aspx?id=8075>

Section 27 of the Ontario Heritage Act requires the clerk of a municipality that has been designated by the municipality or by the Minister under Part IV and shall contain a specified description with respect to each property. The act indicates that a municipality may also include property that is not designated on the municipal heritage register. The main implication of being included as a non-designated property on the municipal heritage register is that it enables the municipality to withhold issuance of a demolition permit application for 60 days.

The properties which are subject to this development (435 – 45) are designated under the Ontario Heritage Act and are therefore included on the Municipal Heritage Register as designated.

The following individual properties are located adjacent to the proposed development and are included on the municipal heritage register. Other properties of note in the vicinity are also referenced.

Table 1: Adjacent Heritage Properties

Property	Name	Location	Status	Potential Impact
399 Ridout Street North	Middlesex County Court House Museum	Prominent building in the vicinity of the development	Designated Part V – Downtown Heritage District	View from the Courthouse to the City facing east
421 Ridout Street North	London Museum	Adjacent on south side of Riverside Drive	Designated Part V – Downtown Heritage District	View from the London Museum to the City facing north.
466 Ridout Street North		Adjacent on the east side of Rideout Street	Register	View of the sky from the east side of the street and increased shadowing.
468 Ridout Street North		Adjacent on the east side of Rideout Street	Register	View of the sky from the east side of the street and increased shadowing
470 Ridout Street North		Adjacent on the east side of Rideout Street	Register	View of the sky from the east side of the street and increased shadowing
472 Ridout Street North		Adjacent on the east side of Rideout Street	Register	View of the sky from the east side of the street and increased shadowing
471 Ridout Street North	Eldon House Museum	Adjacent to the north	Designated, Part IV	View of the sky from the south side of the house, increased shadowing, potential impact on the health of mature and ornamental vegetation on the property
25 Wilson Avenue	Labatt Park	Opposite across River and Harris Park	Designated, Designated Part V	Impact of the view of the London Skyline from the park which already contains high rise buildings.
531 Ridout Street North	Harris Park	Public Park including the Canada 150 Pavilion, Mature trees on the east side of the park, and a greensward on the west side the park to the river's edge, intersected by the Thames Valley parkway	Designated Part V, Downtown Heritage Conservation District	View of the sky from the south and east sides of the development, potential for increased shadowing and adverse impact on mature vegetation.

Section 565 of the Official Plan requires the following with respect to registered heritage resources:

A heritage impact assessment will be required for new development on and adjacent to heritage designated properties and properties listed on the Register to assess potential impacts, and explore alternative development approaches and mitigation measures to address any impact to the cultural heritage resource and its heritage attributes

The impact of the development on the subject and adjacent properties included on the municipal heritage register will be considered as part of this report.

2.6 Downtown Heritage Conservation District

The Downtown Heritage Conservation District was adopted by Municipal Council in 2012, and designated under Part V of the *Ontario Heritage Act* in 2013. The subject property is included within the HCD.

As a part of the HCD Plan and Study, the individual properties that comprise the HCD, as well as their streetscape and landscape characters were categorized and organized into a “Downtown London HCD Matrix” to classify each property. The individual properties were classified under the following three categories:

- Assignment – classification of the building by its age and/or proximity to other heritage buildings;
- Rank – the evaluation of a building’s heritage importance and attributes classified as either priority A, B, or C; and,
- Landscape – a building or site’s relevance to the adjoining streetscape and historical land uses.

The subject property (and the individual buildings included within this report) formed Block 10 of the HCD and include the classifications identified in the Table below.

Table 2: Downtown HCD Classification

Address	Assignment	Description	Ranking	Character-Defining Elements	Landscapes
441 Ridout Street North	H	Bank Block, c. 1845	A	All restored elements including door to carriageway; refer to Designation By-Law;	i
443 Ridout Street North	H	Bank Block, c. 1845	A		i
451 Ridout Street North	H	Anderson House, c. 1852	A	Rebuilt structure; all façade elements;	i
435 Ridout Street North	H	Bank of Upper Canada	A	All restored elements including portico and fanlight over entryway; refer to Designating By-law;	i

The following definitions refer to the assignment, ranking, and landscape codes used to classify each of the properties:

- H (Historic) – Structure built within the critical period between the 1830s – 1980s as defined during the Downtown London HCD Study (January 2011). The building’s architectural character is derived from a number of elements which may include: materials, window design and pattern; store fronts and upper facades; signage; and/or roof type. It may also be associated with other historical attributes such as architect, owners, use. Its importance as part of the streetscape and the District as a whole is reflected in its ranking. It is imperative that

buildings with an H assignment are recognized as falling under the most stringent guidelines of this document based on the associated ranking.

- A – Structure assessed as currently having any combination of the following attributes; all or most of the building’s façade elements are intact; windows may be replaced but occupy original openings; store front retains tradition shape and some features such as windows or terrazzo pavement; previously designated historical or landmark significance; noted architect; good or very good example of recognizable style; important to streetscape; good restorations.
- i – Residential landscape pattern defined by the plots which were originally laid out to accommodate residential and associated buildings with setbacks from the front and side lot lines, creating a landscape prominence to the street.

Accordingly, the subject property and the entire block within which it resides, are assigned as historic structures and include a ranking of “A”. As a result, the buildings included within the study area are ranked as significantly contributing to the HCD, and the policies and guidelines outlined in HCD apply.

2.6.1 Blackfriars-Petersville Heritage Conservation District

The Blackfriars-Petersville HCD was adopted by Council on May 6, 2014 and designated under Part V of the Ontario Heritage Act on May 15, 2015. The subject property is highly visible from the HCD which is located on the opposite (west) side of the Thames River.

Key policy goals stemming from the District Plan which are relevant to this development include:

- Views along streets terminating at the river;
- Views of the Blackfriars bridge;
- Views to the Thames River and associated dyke.

The proposed development is compatible with the intent of the policies of the District plan in that:

- Views to the Thames River are not impeded;
- Views of the City of London already present a high-rise landscape over downtown;
- Built and cultural attributes of the district are not negatively impacted by the proposed development;
- The purpose of this report is to demonstrate that the heritage attributes of protected heritage properties will be conserved.

2.7 Thames River

The Thames River was formally designated a Canadian Heritage River on August 14, 2000. Ontario’s Thames River, one of the most southern Canadian water courses, has exerted a strong influence on both the natural features and the settled landscape within its watershed.

The Thames is a relatively small river on a Canadian scale but has unique natural heritage features. The Thames was one of the first rivers to form following the retreat of the Wisconsin Glacier from Ontario and the upper reaches still flow through these ancient spillways. The lower river reach, with its shallower gradient, emerged after thousands of years as a glacial lake.

The Thames is the only major river in Canada with the majority of its watershed within the Carolinian Life Zone. This region is recognized as one of the most biologically significant and diverse regions in Canada with more than 2200

species of vascular plants identified including the only two locations of the Wood Poppy in Canada. With its many habitats, nutrient rich waters and connection with the Great Lakes, the Thames also contains the largest diversity of clams, the threatened Eastern Spiny Softshell Turtle and one of the most diverse fish communities in Canada. Despite the long period of human occupation and development in the watershed, there are more species of plants and animals present today than in the past, although, protection and restoration efforts are still required to help preserve this unique and vital area of Canadian natural history.

With respect to its human heritage, the Thames River has provided the setting for 11,000 years of significant Aboriginal and European settlement. The Thames, with its abundant fish and game, provided a focus for each group in the sequence of Aboriginal peoples, including those who were the first to practise agriculture in Canada between 500 and 1650 A.D. In the 1700s, the river attracted French fur traders and European settlers, as well as Aboriginal groups. Following the role of the Thames valley as a major theatre in the War of 1812, which included many battles and Tecumseh's death in the Battle of the Thames at Moraviantown, pioneer settlement within the watershed developed into Canada's first successful commercial agrarian society based on wheat. In turn, many of the numerous watermill sites provided the basis for industrial and urban development, including the major riverine cities, notably the early river port and ship building centre of Chatham, as well as London, Stratford and Woodstock, and a number of smaller towns and villages. Agriculture flourished during this time and the watershed has continued as the most prosperous farming landscape in Canada. During the American Civil War, the Thames served as the final avenue to freedom for blacks fleeing slavery through the Underground Railroad. Today, in remembrance, a tour leads visitors to many significant landmarks in the refugee slave settlements near the Thames River including the Buxton Historic Site and Museum, and the First Baptist Church in Chatham.

From *The Thames River Watershed: A background Study for nomination under the Canadian Heritage Rivers System, 1998, Upper Thames River Conservation Authority for the Thames River Coordinating Committee.*

2.8 Heritage Integrity

According to the Ontario Heritage Toolkit, Heritage Property Evaluation (MTCS 2006), *"Integrity is a question of whether the surviving physical features (heritage attributes) continue to represent or support the cultural heritage value or interest of the property."* The following discussion of integrity was prepared to consider the ability of the property to represent and retain its cultural heritage value over time. It does not consider the structural integrity of the building. Access to the interior of the building was not available, and observations have been made from the public right-of-way. Structural integrity, should it be identified as a concern, should be determined by way of a qualified heritage engineer, building scientist, or architect.

The subject property contains three heritage structures, designed and constructed in their respective Georgian and Victorian Eclectic styles. As noted above, the heritage buildings were previously in severely dilapidated conditions; however, they were significantly and carefully restored in 1970 by the John Labatt Company. As a result, the buildings and the subject property retain much of the integrity of their original built character. In September 2018, a fire took place within the 435 Ridout Street North building. The integrity of the building was reportedly not compromised; however, firefighters were forced to break windows in order to ventilate the structure. The window openings have since been covered with plywood for security reasons. Nonetheless, the building still retains much of its integrity.



Image 1: View showing heritage structure at 435 Ridout Street North, with boarded-up windows due to fire damage from September 2018



Image 2: View showing heritage buildings at 441-447, and 451 Ridout Street North



Image 3: View showing heritage building at 451 Ridout Street North



Image 4: View looking northwest along Ridout Street North showing the three heritage buildings in their street context



Image 5: View showing rear of 435 Ridout Street North from surface parking lot accessed from Queens Avenue



Image 6: View looking east from surface parking lot accessed from Harris Gate. The structure in the foreground is the modern commercial structure built to the rear of 451 Ridout Street North



Image 7: View showing modern commercial structure constructed to the rear of 451 Ridout Street North, built into the embankment



Image 8: View looking west from surface parking lot showing existing lot adjacent to Harris Park



Image 9: View showing rear of the three heritage buildings from the surface parking lot accessed from Queens Avenue



Image 10: View looking south showing the north side of 451 Ridout Street North, and the heritage buildings within their street context



Image 11: View looking west from Queens Avenue, showing the three heritage buildings, and the curvature of Queens Avenue at left



Image 12: View looking north on Ridout Street North, showing the three heritage buildings in their surrounding context



Image 13: View to the Eldon House property, located immediately north of the subject property



Image 14: View looking north showing the three heritage buildings at right, within the larger built environment, located south of the subject property



Image 15: View looking north showing the historic Middlesex County Court House and Gaol at left. The three heritage buildings can be seen far in the centre of the image.

3. Proposed Undertaking

3.1 Project Description

The observations for this HIA described within Section 5.1 and 5.2 were developed based on the proposed project materials prepared in March 2018 for Farhi Holdings Corporation, by Tillman Ruth Robinson Architects.

The proposal is seeking to allow for the development and construction of a 40-storey tower that would include residential, hotel, office, and retail uses (**See Appendix A**). The proposed development has undergone various refinements since 2013 and seeks to maintain all existing heritage buildings on the subject property. Previous iterations of the proposal also sought to construct a new 4-storey parking garage along Queens Avenue. However, as a result of setback requirements for the proposed Bus Rapid Transit project, the parking garage is unfeasible.

The redesigned site plan for the property proposes to construct the tower towards the north end of the property, to the rear of 451 Ridout Street North, replacing the modern structure currently located here that was built in the 1970s. The tower is proposed for this location to minimize impacts on the site, and to minimize the extent of overlap over the flood line. This option also includes the location of the parking garage below the tower, constructed within the east bank of the slope on the property. The parking garage is proposed to be designed to be watertight to the extent of the 250-year flood line. This site plan option would result in the retention of the existing heritage buildings, and their re-purposing for integration into the proposed tower. Driveway and drop-off access would be accessed off of Ridout Street North, within the vicinity of the existing parking lot. A proposed public space located behind the 435 and 441 Ridout Street North buildings would connect the street level with Harris Park, the Thames River, and the trail below the slope.

The following is a description of the proposed development from Tom Tillman, architect with Tillman Ruth Robinson who is designing this project:

- The proposed mixed use development at the Ridout Street complex of buildings is a nexus where London's future will meet and compliment London's past. The three heritage buildings will remain intact and preserved in their entirety in keeping with the heritage designations that protect them. The sitework at street level both along Ridout Street and Queens Avenue will be enhanced with hard and soft scape features that will compliment the significance of these three historic gems. Very special attention and measures will be afforded during the construction to absolutely ensure that the integrity and all architectural features of 435, 441 and 451 Ridout Street remain preserved in their found state. 435 Ridout Street will have its windows re-instated (lost in a fire) in keeping with the architectural style and period of its original construction. When the early 1970's addition is removed from the west face of 451 Ridout Street, it will be replaced with new construction that ensures that 451 Ridout remains intact and fully historically correct on the interior.
- Overall the residential/commercial tower has been placed on axis with 451 Ridout Street and Queens Avenue to reinforce the importance of this site. The existing surface parking lot located down in Harris Park will revert back to parkland in keeping with green landscape in the park and at the Thames River. New pedestrian linkages will be created to allow the public to move more easily between Harris Park below and the Ridout complex of buildings above. The existing trees which border to the north enclosing the Eldon property will remain and be properly protected throughout the construction process. Care has been taken to place the new tower such that it has minimal impact on the Eldon property both from a shadow perspective but also from a growth perspective related to the lawns and gardens.

3.2 Approach

The approach for the proposed development includes a series of visions, goals, and opportunities that are being considered for the project. The vision for the project is to create a landmark development for the City of London that also creates a mixed used function supporting the Downtown Plan, the London Plan, and the Back to the River initiative, while also maintain the existing heritage buildings with an integrated use. A number of goals are proposed for the project as well, including supporting the London Plan, expanding Harris Park to the south (by dedication of land to the City), improving the remnant slope, physically connecting downtown to the river, eliminating existing surface parking along the river, and minimizing flood water displacement.

The following proposed public benefits and opportunities have been identified as a part of the proposal for the development:

- Opportunity to remove non-natural fill materials through excavation of the bank;
- Opportunity to stabilize the existing bank and re-naturalize it through new landscaping;
- Supporting the Downtown Plan by:
 - Engaging the river with publicly accessible lookouts, terraces, and new pathways that connect the street with the Thames River;
 - Bringing people to the river by providing new places to live, work, and play overlooking the Thames River
- Supporting the Back to the River Initiative by:
 - Understanding the importance of the Thames River for the city; the project strives to give Londoners a place to work, to play, and call home.
- Supporting the One River Environmental Assessment by:
 - Improving the natural environment and drawing people to the Thames River.
- Supporting the London Plan by:
 - Planning for exceptional places and spaces, growing inward and upward, giving real and attractive mobility choices (walking, cycling, and transit), and building strong and healthy neighbourhoods for everyone.
- Supporting the Thames Valley Corridor Plan by:
 - Identifying suitable points of access, pathway and trail systems, lookout points and linkages to communities and the Thames Valley Parkway;
- Protecting heritage by:
 - Retaining and re-purposing the existing heritage structures on site;
 - Adding new landscape features to the Eldon House front lawn;
 - Drawing people to the Eldon House property and connecting the south side of the Eldon House property to a new path proposed to link to the river-side circulation routes.

3.3 Planning Justification

The subject application is for Official Plan Amendment and Zoning By-law Amendment Applications for the property located at 435, 441 and 451 Ridout Street North, London, Ontario. The applicant is Farhi Holdings Corporation.

As part of the complete application requirements of the City of London a Planning Justification Report, dated July 2019 was prepared by MacNaughton, Hermson, Britton, Clarkson Planning Limited (MHBC) of London, Ontario.

The subject lands are a single property located at the northwest corner of Queens Avenue and Ridout Street North, immediately east of the Thames River corridor and Harris Park. In total, this project measures 1.4 ha in area and contains three existing parking facilities as well as surface parking facilities. The property is designated under Part IV of the *Ontario Heritage Act*, and is also designated under Part V of the *Ontario Heritage Act* as part of the Downtown London Heritage Conservation District. Further, the property is identified as a National Historic Site of Canada.

The proposed redevelopment concept for the subject property incorporates a 40 storey, mixed-use tower to replace the three-storey office building addition located to the rear/west of the historic structure addressed as 451 Ridout Street. The proposed tower, which would be connected to 451 Ridout Street, would contain approximately 6,308 m² of office/commercial space on lower floors and a total of 280 residential suites on the upper floors. No modifications are proposed to the heritage buildings addressed 435 and 441 Ridout Street. ‘

Key components of the proposed project are as follows:

- A 40-storey tower incorporating an enhanced level of architectural design and containing 6,308 m² of office/commercial space within the first four levels and a maximum of 280 apartment units within levels five (5) to 40. The tower base, which would include the office/commercial space, main lobby space, storage areas and administrative offices, would have a total building area of approximately 1,670 m². The main tower component would incorporate a slender floorplate (approximately 860 m² in area) and would contain a range of suite configurations;
- A variety of indoor amenities within the tower, including a lounge area, fitness facility, party room and outdoor patio space on the fifth floor;
- Outdoor amenity space interspersed throughout the property and visible from the public realm, including landscaped forecourts adjacent to the entrances and vehicle drop-off areas;
- A multi-level parking area integrating four storeys of underground parking and at-grade parking areas, as well as a loading area, bicycle storage and waste/recycling storage. A total of 372 vehicle stalls would be accommodated in this arrangement, with parking (315 stalls) predominately accommodated underground. It is envisioned that at-grade stalls would primarily function as visitor parking;
- Right-in, right-out entrances under existing street configurations providing street access to Queens Avenue (one entrance) and Ridout Street North (two entrances). A right-in entrance from Ridout Street North is also proposed at the northern limit of the Site;
- Access driveways to the 4-storey parking garage provided at-grade from Queens Avenue and Ridout Street North. Additionally, delivery vehicles would access the underground parking facility via the existing private driveway connecting to the Harris Park entrance; and
- Pedestrian connections to improve access to the street frontages, the Thames Valley Parkway and Harris Park in order to support greater active transportation linkages between the Downtown and the Thames River corridor.

Several design elements have been integrated into the proposal in an effort to achieve compatibility with its surroundings:

Building Form and Orientation

- The proposed mixed-use, high rise building would be positioned at the rear of the heritage structure at 451 Ridout Street North, generally at the location of the existing building addition. The tower component of the new building is positioned immediately west of this heritage structure, with the four-storey office/commercial element extending north from the tower base.
- The proposed building arrangement is intended to preserve the unobstructed view of 435, 441 and 451 Ridout Street North from the street frontage and to promote a landmark vista at the western terminus of Queen Street.
- By positioning the tower to the rear of these buildings, the design layout also enhances the prominence of the structure from the Thames River corridor (particularly from the Forks of the Thames activity area). Moreover, the tower location would help to frame Harris Park and the Thames Valley Parkway, while also providing increased surveillance into this area (contributing to a safer pedestrian environment).
- In summary, the building positioning is intended to complement, and be sympathetic to, the character of these heritage buildings and the broader Downtown London setting. In this respect, the form and orientation of the tower would establish an iconic gateway feature, while also helping to accentuate the overall character and vitality of Downtown London.

Building Massing

- The massing of the proposed point tower is designed to create a comfortable and engaging pedestrian environment that is compatible with, and sensitive to, the adjacent streetscapes, the local development context and the broader downtown setting. Further, the building integrates three principal elements above-grade:
 1. 'Base' Element. The 'base' component of the proposed tower generally encompasses the main building entrance, building lobby and office/commercial space. In total, the tower base integrates the first four floors of the development and is designed to both integrate with 451 Ridout Street North and complement nearby heritage buildings. The positioning of the base component also maintains the continuity of the existing street edge along Ridout Street North and helps to frame the development interface with Harris Park.
 2. 'Middle' Element. Residential units are massed in a defined 'middle' feature situated above the office/commercial space and deck parking and extending from the fifth to 29th floors. The middle element includes the core apartment component of the project, as well as amenity space provided on the fifth floor. Apartment suites incorporate individual balconies oriented towards Ridout Street North, Queens Avenue and Harris Park. These protruding balconies provide shadowing into and across the building surface. Further, distinctive patterned design elements extend the length of the middle feature along the front portions of the east and west façades. Collectively, the components of the middle element serve to soften the massing of the building while also accentuating its relationship with the adjacent streetscapes and the Thames Valley corridor.
 3. 'Top' Element. The top of the building incorporates the 30th to 40th floors and has been designed to be distinctive and to positively contribute to the downtown skyline. This tower component is intended to house residential suites having individual balconies consistent in purpose as those planned for the middle element. The rooftop element would integrate a penthouse suite, a large terrace and mechanical equipment.

Façade Treatment

- The tower design incorporates a consistent, contemporary façade style integrating extensive glazing and repetition of lines and windows through horizontal articulations (to help break up the continuous mass of the structure). Most notably, curved elements are integrated the base, middle and top façades to acknowledge and reflect the Thames River corridor interfacing with and inspiring this design. Interruptions (cut-outs) in the balcony design are also proposed to provide unique design components within the tower to further break up the building mass. Moreover, large windows and entrance features in the lower floors would help to promote more active street frontages along Ridout Street North and Queens Avenue, and to further animate the west elevation (viewed from the Thames River corridor). Appendices 'A' and 'B' present several renderings of the proposed development which illustrate the aforementioned design treatments.

Pedestrian Environment/Outdoor Amenity Space

- The office/commercial and residential elements of the proposed tower are to be accessed by a common (main) pedestrian entrance from the Ridout Street North sidewalk to the building lobby. The walkway extends along the north face of 451 Ridout Street North. A secondary building access is also provided along the south building elevation to provide connectivity from the surface parking lot and the Queens Avenue sidewalk. Internal walkways would also provide linkages to surface parking areas, the Thames Valley Parkway and Harris Park.

The planning merits of this proposal are evaluated in detail within the Planning Justification Report and are summarized below:

- The project supports the intensification of lands in the City's downtown that are designated in the City's 1989 Official Plan and The London Plan for high density residential, office, and commercial uses;
- The property is well suited for this development proposal considering its physical size/shape, its location within a mixed-use development area and its proximity to existing offices, retail/service commercial enterprises, government activities, recreational, entertainment and cultural facilities, public transit services and the proposed bus rapid transit (BRT) system. Residents and employees of this new development would therefore have access to, and would support, a range of local businesses, public institutions and transit services;
- Design elements integrated into the proposal promote an attractive and prominent building form that would contribute positively to both the local streetscape and the City's downtown skyline. Additionally, the high-rise building design would create a landmark for the Forks of the Thames activity area and, more broadly, Downtown London;
- Introduces greater housing choice within the downtown core to help broaden the range and mix of housing available to current and future residents of Central London. In effect, this project would help the City accommodate forecasted housing demands and achieve intensification targets; and
- Integrates a mix of higher density residential and complementary office/commercial uses which, collectively, would support efforts to revitalize the downtown core and encourage its continued development as a multi-functional regional centre. The proposal would also help to promote neighbourhood stability in the downtown core by diversifying the mix of housing available in this area (to better meet the changing needs of local residents over the long-term).

In light of these considerations, the Planning Justification Report concludes that this proposal is appropriate for the subject lands and the downtown development context and should not generate significant land use conflicts with adjacent properties.

As part of the planning analysis, the following documents were reviewed:

- Provincial Policy Statement;

- City of London Official Plan (1989);
- City of London Official Plan (The London Plan);
- City of London Zoning By-law Z.-1;
- Our Move Forward (London's Downtown Plan);
- Downtown Heritage Conservation District Plan; and
- Downtown London Community Improvement Project.

All of the above documents have reference to cultural heritage as part of the overall municipal planning policy context.

A 'Pre-Application Consultation' meeting was held on June 13, 2017 to review the submission requirements for the development concept. As set out in the associated 'Record of Pre-Application Consultation', a number of reports have been prepared in support of the proposal and are enclosed with the OPA and ZBA applications: These include the following related to cultural heritage:

- Planning Justification Report, with urban design considerations
- Heritage Impact Statement
- Stage 1-2 Archaeological Assessment

The Planning Justification Report references Heritage Considerations as follows:

The three existing buildings on the Site (435, 441 and 451 Ridout Street North) are listed on the City of London's Inventory of Heritage Resources (Register) as 'Priority 1' structures. Section 4.0 of the Register sets out that Priority I buildings are considered to be London's most important heritage structures and merit designation under Part IV of the Ontario Heritage Act. In this respect, the subject property is designated under Part IV of the Act. The property is also designated under Part V of the Act as a part of the Downtown London Heritage Conservation District, and is identified as a National Historic Site of Canada (referred to as the 'Ridout Street Complex'). Further, the Site is adjacent to other listed heritage properties, including the Eldon House (481 Ridout Street North) and the Middlesex Courthouse and Gaol (399 Ridout Street North).

AECOM Canada Inc. (AECOM) has conducted a Heritage Impact Assessment (HIA) in conjunction with this proposal to evaluate the potential heritage impacts of the proposed redevelopment plan. It is generally concluded in Section 7 of the HIA that, to mitigate the potential direct and indirect impacts to identified cultural heritage value, mitigation strategies described in the report should be considered in conjunction with project refinements.

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4. Measurement of Development or Site Alteration Impact

4.1 Heritage Policy Evaluation (PPS, London Official Plan, and Downtown Heritage Conservation District Plan)

The proposed development has been evaluated for compliance with relevant heritage policies in effect in the City of London. These include the Provincial Policy Statement, the London Plan and the Downtown Heritage Conservation District plan. The impact on adjacent properties including the Blackfriars-Petersville Heritage Conservation District has also been assessed. These are as follows:

Table 3: Evaluation of Policies Against Development

Policy	Analysis and Commentary
THE LONDON PLAN (Official Plan)	
<p>565_ New development, redevelopment, and all civic works and projects on and adjacent to heritage designated properties and properties listed on the Register will be designed to protect the heritage attributes and character of those resources, to minimize visual and physical impact on these resources. A heritage impact assessment will be required for new development on and adjacent to heritage designated properties and properties listed on the Register to assess potential impacts, and explore alternative development approaches and mitigation measures to address any impact to the cultural heritage resource and its heritage attributes</p>	<p>The proposed development meets the intent of the Official Plan as follows:</p> <ul style="list-style-type: none"> - The proposed development preserves all existing heritage resources on the site in situ and in doing so also preserves the majority of the human scale streetscape. - The Proposed development is designed to draw the eye to the podium level by utilizing the retention of heritage resources and a combination of compatible materials (brick) and compatible contrast (glazing) to achieve compatibility with the surrounding heritage resources and districts - The London Plan anticipates and has already experienced high-density intensification in this area. There are other high-rise towers in the immediate vicinity which already form a high-rise skyline from such places as Harris Park, Labatt Park, Museum and former Middlesex County Court House complex and the Thames River. - This document satisfies the requirement that a Heritage impact assessment is required for new development on or adjacent to heritage designated properties and properties listed on the register.
<p>568_ Conservation of whole buildings on properties identified on the Register is encouraged and the retention of façades alone is discouraged. The portion of a cultural heritage resource to be conserved should reflect its significant attributes including its mass and volume.</p>	<p>The proposed development retains 3 existing heritage resources on site of confirmed National Heritage Significance and successfully o achieve compatibility with nearby heritage resources.</p>
<p>584_ Building height and densities may be increased, in conformity with the Bonus Zoning policies in the Our Tools part of this Plan, in support of heritage</p>	<p>The proposed development retains 3 existing heritage resources on site of confirmed National Heritage Significance and</p>

Policy	Analysis and Commentary
<p>designation of a property that is of cultural heritage value or interest.</p>	<p>successfully o achieve compatibility with nearby heritage resources.</p>
<p>586_ The City shall not permit development and site alteration on adjacent lands to heritage designated properties or properties listed on the Register except where the proposed development and site alteration has been evaluated and it has been demonstrated that the heritage attributes of the heritage designated properties or properties listed on the Register will be conserved.</p>	<p>The subject development is located adjacent to designated heritage resources (Eldon House) and through design and other measures to be determined (vegetative screen enhancement) demonstrates that the heritage attributes of Eldon House and other part V designated heritage properties are maintained.</p>
<p>589_ A property owner may apply to alter the cultural heritage attributes of a property designated under the Ontario Heritage Act. The City may, pursuant to the Act, issue a permit to alter the structure. In consultation with the London Advisory Committee on Heritage, the municipality may delegate approvals for such permits to an authority</p>	<p>The owner is not proposing alterations to the heritage resources on the subject property, however, if alterations are required it is understood that they would be undertaken in compatibility with the heritage attributes of the site and the applicant would seek a heritage permit as required.</p>
<p>594_ Within heritage conservation districts established in conformity with this chapter, the following policies shall apply:</p> <p>1) The character of the district shall be maintained by encouraging the retention of existing structures and landscapes that contribute to the character of the district.</p>	<p>The proposed development retains all existing structures. Heritage landscapes both adjacent and in the vicinity are already framed by high rise buildings Mitigative measures would need to be implemented (e.g. new plantings) to lessen the impact on existing mature vegetation in the vicinity.</p>
<p>2) The design of new development, either as infilling, redevelopment, or as additions to existing buildings, should complement the prevailing character of the area</p>	<p>The proponent seeks to compliment the prevailing character of the area by retaining all existing heritage resources in situ, by maintaining strong heritage focussed podium that draws the eye to lower levels, by utilizing both compatible materials and compatible contrast materials to improve compatibility of the development with the prevailing character of the area.</p> <p>The subject area has been long planned for intensification and there are multiple high-rise buildings in the vicinity. The subject development would not look out of place; indeed, the tower would complement the overall modern-day City of London skyline.</p>
<p>3) Regard shall be had at all times to the guidelines and intent of the heritage conservation district plan</p>	<p>The following is a consideration of policies relevant to the proposed development within the Downtown London Heritage Conservation District Plan.</p>

Policy	Analysis and Commentary
<p>3.2.2 Social Goals & Objectives</p> <p>Encourage the redevelopment, intensification, and acceptance of the Downtown as the cultural and social focus of the community;</p>	<ul style="list-style-type: none"> ■ <i>The subject proposal supports the goals of Section 3.2.2 by bringing population and businesses downtown, the subject development will complement the economic vitality of downtown and in doing so achieve an environment conducive to the preservation and maintenance of heritage resources</i>
<p>6.1.4 New Construction</p> <p>The Downtown is a vibrant environment and is anticipated to continue to develop and grow throughout London’s future. However, the remaining physical evidence of the city’s historical beginnings is something that this HCD intends to preserve and compliment. The guidelines that ensue are written to help ensure that new construction respects the history that will surround it in material, massing and other aesthetic choices.</p>	<ul style="list-style-type: none"> ■ <i>The proposed development achieves compatibility by retaining all heritage buildings on the site and by using compatible and compatible contrast materials and stepping back of upper stories to ensure that the new construction respects the historical environment that surrounds it.</i>
<p>6.1.4.1 Principles</p> <p>Any new construction shall ensure the conservation of character-defining elements of the buildings it will neighbour and also the building being added to when considering additions. New work is to be made both physically and visually compatible with the historic place while not trying to replicate it in the whole. The new work should easily be decipherable from its historic precedent while still complementing adjacent heritage buildings.</p>	<ul style="list-style-type: none"> ■ <i>The proposed development retains all existing heritage buildings on site and it is intended to implement mitigation measures to ensure compatibility of the proposed development with adjacent heritage resources and landscapes.</i>
<p>Facade composition and height are two major components in maintaining the character of the current streetscapes. A single excessively tall and imposing structure can completely alter the pedestrian-focused atmosphere of the Downtown. Use roof shapes and major design elements that are complementary to surrounding buildings and heritage patterns.</p>	<ul style="list-style-type: none"> ■ <i>The proposed development is one of a number of tall buildings located in the immediate vicinity. By utilizing progressive measures in building form and materials the proposed development achieves greater compatibility than any existing high-rise buildings in the vicinity with the heritage environment.</i>
<p>Setbacks of new development should be consistent with adjacent buildings. New buildings and entrances must be oriented to the street and are encouraged to have architectural interest to contribute to the streetscape. Respond to unique conditions or location, such as corner properties, by providing architectural interest and details on both street facing facades.</p>	<ul style="list-style-type: none"> ■ <i>The proposed development achieves compatible setbacks to Ridout Street and Queen’s Avenue by retaining the existing buildings on site and rendering at street level the heritage buildings as the dominant form in the redeveloped property.</i> ■ <i>In consideration of the prevailing high-rise environment that already exists downtown and the progressive efforts made to achieve compatibility in this phase of the development it is determined that the proposed development would not cause significant negative</i>

Policy	Analysis and Commentary
	<p><i>impacts on views from adjacent and nearby public parts and community spaces.</i></p>
<p>596_ A property owner may apply to alter a property within a heritage conservation district. The City may, pursuant to the Ontario Heritage Act, issue a permit to alter the structure. In consultation with the London Advisory Committee on Heritage, the City may delegate approvals for such permits to an authority.</p>	<ul style="list-style-type: none"> ▪ <i>A heritage permit would be required for alterations to the designated properties which are located within a heritage conservation district. The owners are not proposing any alterations to the existing heritage properties, however, if alterations are subsequently proposed a heritage permit would be required to be obtained by the applicant after review by the City and its municipal heritage advisory committee as required under the Act. The connection of the proposed tower to 451 Ridout Street would require a heritage permit and would be subject to the level of review and compatibility analysis as described in this report.</i>
<p>597_ Where a property is located within a heritage conservation district designated by City Council, the alteration, erection, demolition, or removal of buildings or structures within the district shall be subject to the provisions of Part V of the Ontario Heritage Act.</p>	<ul style="list-style-type: none"> ▪ <i>The removal of the modern rear addition to 451 Ridout would require review against the provisions of Part V of the Ontario Heritage Act.</i>
<p>598_ Development and site alteration on adjacent lands to a heritage conservation district may be permitted where the proposed development and site alteration has been evaluated and it has been demonstrated that the heritage attributes of the protected heritage property will be conserved.</p>	<ul style="list-style-type: none"> ▪ <i>The subject property is located adjacent to the Blackfriars-Petersville Heritage Conservation District. Key policy goals stemming from the District Plan which are relevant to this development include:</i> <ul style="list-style-type: none"> • Views along streets terminating at the river • Views of the Blackfriars bridge • Views to the Thames River and associated dyke ▪ <i>The district plan references adjacent Areas under Section 7.16. Key policies under 7.16 which are relevant to this development include:</i> <ul style="list-style-type: none"> • A heritage impact assessment may be required for proposed development that has the potential to impact any heritage attribute of the resource (The District) ▪ <i>The City shall ensure that the identified heritage attributes of the district are protected during adjacent development and site alteration</i> ▪ <i>The City may require preparation of a heritage impact assessment</i> ▪ <i>Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property except where the proposed development has been evaluated and it has been demonstrated that the heritage attributes of the protected heritage property will be conserved.</i>

Policy	Analysis and Commentary
	<ul style="list-style-type: none"> ■ The proposed development is compatible with the intent of the policies of the District plan in that: <ul style="list-style-type: none"> • Views to the Thames River are not impeded; ■ Views of the City of London already present a high-rise landscape over downtown ■ Built and cultural attributes of the district are not negatively impacted by the proposed development ■ The purpose of this report is to demonstrate that the heritage attributes of protected heritage properties will be conserved.
<p style="text-align: center;">CULTURAL HERITAGE LANDSCAPES</p> <p>602_ Areas of the city that City Council considers to be of cultural heritage value or interest may be recognized as cultural heritage landscapes consistent with the Provincial Policy Statement and in conformity with the policies of this Plan and will be added to the Register.</p>	<ul style="list-style-type: none"> ■ <i>The City of London has not formally adopted the areas adjacent to the subject development site as an official cultural heritage landscape as defined in the Provincial Policy Statement.</i> ■ <i>Areas in the vicinity of the development which are heritage conservation districts may be considered de-facto cultural heritage landscapes, however, compatibility of the proposed development with the Downtown and BlackFriars-Petersville Heritage Conservation Districts have been demonstrated elsewhere in this report.</i>
<p>293_ High-rise buildings should be designed with slender towers that reduce shadow impact, minimize the obstruction of views, and are less massive to neighbouring properties. A typical floor plate of approximately 1,000m² is a reasonable target to achieve this goal. Commercial towers may have larger floor plates but should still have effective separations between towers to allow access to sunlight and views.</p>	<ul style="list-style-type: none"> ■ <i>The proposed development is designed in accordance with this policy with a slender tower with a floor plate of 860 m in area, less than the 1000 m area required by the Official Plan</i>

A review of the proposed development against relevant policies of the Official Plan and heritage conservation district plans demonstrate that proposal and its design support and enhances the cultural heritage value and interest of heritage resources impacted on the subject site, adjacencies and the heritage districts as follows:

- The proposed development aims to preserve all existing heritage resources on-site.
- The design for the Tower which includes an articulated podium, framed towards Ridout Street by heritage buildings draws the eye to and maintains the prominence of the heritage streetscape at pedestrian level.
- The use of compatible materials (buff brick) and compatible contrasting materials (glazing) provides the tower with compatibility with the existing heritage context and buildings and also provides a distinct visual separation between old and new.

- Downtown London is an environment of economic activity which has resulted in the construction of a number of high rise commercial and residential buildings in the vicinity which already intersect with traditional views within, to and from the site and heritage districts. The proposed tower therefore does not offend existing viewsheds, and indeed, with the use of modern techniques of compatibility (podium and point tower, materials, retention of heritage resources and other mitigation measures, achieves a greater level of compatibility than those which have preceded it.
- Mitigation measures related to shadow impacts resulting from the tower would be designed to minimise the impact of shadows on existing mature vegetation.

The positive economic impact of the proposed development on the downtown area, bringing more business and residents to the downtown core would enhance overall prosperity in the downtown and create better conditions for the rehabilitation and maintenance of heritage resources

Note the London Plan is deemed to be in compliance with the Provincial Policy Statement, therefore analysis against the London Plan satisfies this requirement of evaluating compatibility with the PPS.

4.2 Potential Impacts on Heritage Attributes

The MTCS identifies typical types of direct and indirect impacts that can be anticipated to impact recognized or potential heritage properties as a result of a proposed undertaking. Direct impacts consist of destruction or alteration of a heritage property, while the indirect impacts includes factors such as shadows, isolation, obstruction, change in land use, and land disturbance.

These impacts were assessed according to the MTCS’ *Ontario Heritage Toolkit: Heritage Resources in the Land Use Planning Process*. The sections below outline the potential impacts identified by MTCS, and their relevance to this project.

4.2.1 Ridout Street Complex

The Ridout Street Complex is to be preserved as part of the development; however, there would be other direct and indirect impacts on the complex resulting from the development which are articulated below.

Table 4: Potential Direct Impacts and Relevance to the Project

Direct Impacts	Relevance to the Project
<p>Loss/Destruction/Demolition of any or part of any significant heritage attribute or feature.</p>	<p>The three heritage structures are proposed to be retained in situ, and are not proposed for demolition or loss as a result of this project. As a result, the heritage attributes, or character-defining elements will not be impacted as a part of the proposed project.</p> <p>At this time no alterations to interior elements of 451 Ridout are anticipated; however, some transition will need to be planned in order to facilitate the connection between the old and new structures.</p> <p>Protected interior features as described in the designation by-law include the following:</p>

	<p><i>Any surviving original interior detailing, furnishing and fittings, including: shutters, door and window trim, ceiling mouldings, cornices, mantelpieces, fireplaces, columns and brackets</i></p> <p>Any alterations to protected heritage elements as described in the designation by-law would require a heritage permit.</p>
<p>Displacement/Alteration that is not sympathetic, or is incompatible, with the historic fabric or appearance.</p>	<p>Alterations to the exteriors of the three heritage structures are not anticipated as a part of this project. The property as a whole is proposed to be developed and will undergo significant alteration; however, this proposal includes the retention of the three heritage buildings as is. It is understood that the buildings will be integrated for the proposed project.</p>

Table 5: Potential Indirect Impacts and Relevance to the Project

Indirect Impacts	Relevance to the Project
<p>Shadows created that alter the appearance of a heritage attribute or change the visibility of a natural feature or plantings, such as a garden.</p>	<p>Given that the proposed project will result in the construction of a proposed tower immediately adjacent to a heritage structure on the same property, it is likely that the proposed project will result in shadows on the property. Potential shadows may alter or change the visibility of the scale of the three heritage buildings, and of their location along the Thames River described in the designating-by-laws and recognitions.</p>
<p>Isolation of a heritage attribute from its surrounding environment, context, or a significant relationship.</p>	<p>The proposed project is not anticipated to isolate a heritage attribute or individual heritage building from its surrounding environment, context, or a significant relationship. Although the construction of the new tower may visually alter the views and relationship between the subject property and the adjacent Eldon House property, it is not anticipated to isolate either structure or property.</p>
<p>Land Disturbance such as a change in grade that alters the historic patterns of topography or drainage.</p>	<p>Completion of the proposed project will result in land disturbance; however, the construction will be temporary in nature and is not anticipated to affect any historic patterns, or result in permanent impacts to heritage resources. In addition, it is understood that archaeological assessments will be completed for the project, which will also assess the archaeological potential for the subject property.</p>
<p>Changes in Land Use such as rezoning a battlefield from open spaces to residential use, allowing new development of site alteration to fill in the formerly open spaces.</p>	<p>The proposed project will result in a change in use for the property. The property is currently being used for commercial purposes, but is proposed for use as commercial, residential, and public space purposes.</p>
<p>Obstruction of significant views or vistas from, within, or to a built and natural feature.</p>	<p>Given that the proposed project will result in the construction of a proposed tower immediately adjacent to a heritage structure on the same property, it is likely that the proposed project will result in shadows on the property that may alter or change the visibility of the scale of the three heritage buildings, and of their location along the Thames River described in the designating-by-laws and recognitions.</p>

Based on the extensive cultural heritage value that the subject property exhibits and the large-scale development that is proposed, it is anticipated that the project has potential to result in both direct and indirect impacts to the identified cultural heritage value of the property. The views to and from the property will be significantly altered as a result of the proposed tower.

4.2.2 Eldon House

Eldon House and its grounds are located immediately to the north of the subject property. There would be no disturbance from this development as described previously on the Eldon House property. The primary impacts appear to be related to shadowing and land disturbance during construction. There are no direct impacts identified to the resource.

Table 6: Potential indirect impacts and their relevance to the project

Indirect Impacts	Relevance to the Project
Shadows created that alter the appearance of a heritage attribute or change the visibility of a natural feature or plantings, such as a garden.	Given that the proposed project will result in the construction of a proposed tower immediately adjacent to the Eldon House property, it is likely that the proposed project will result in shadows on the property. Potential shadows may alter or change the visibility of the scale of Eldon House and impact the mature trees and gardens. The shadow study required as part of the complete application more fully determines the impact of shadowing on the Eldon House property. See Section 4.4 of this report for further details.
Land Disturbance such as a change in grade that alters the historic patterns of topography or drainage.	Completion of the proposed project will result in land disturbance on the adjacent property which may result in noise and vibration being experienced on the Eldon House property; however, the construction will be temporary in nature and is not anticipated to affect any historic patterns, or result in permanent impacts to heritage resources.

Based on the extensive cultural heritage value that the subject property exhibits and the large-scale development that is proposed adjacent to it, it is anticipated that the project has potential to result indirect impacts to the identified cultural heritage value of the property. Specifically, the integration of the new tower with the surrounding heritage environment has the potential to increase the amount of shadowing experienced on the buildings and grounds of Eldon House.

4.2.3 Downtown Heritage Conservation District

The Ridout Complex is located within the Downtown Heritage Conservation District. Potential Impacts to the district resulting from the development are as follows:

Table 7: Potential Direct Impacts to the Downtown HCD

Direct Impacts	Relevance to the Project
Loss/Destruction/Demolition of any or part of any significant heritage attribute or feature.	No heritage resources in the district are proposed to be demolished as a result there would be no impact due to Loss/Destruction.

<p>Displacement/Alteration that is not sympathetic, or is incompatible, with the historic fabric or appearance.</p>	<p>Alterations to the exteriors of the three heritage structures located within the district are not anticipated as a part of this project. The property as a whole is proposed to be developed and will undergo significant alteration and intensification, and therefore the overall appearance of the site will be altered; however, this proposal includes the retention of the three heritage buildings. It is understood that the buildings will be integrated and retained for the proposed project.</p> <p>The design and form of the project with a podium framed by heritage buildings helps to minimise the impact of the development by maintaining the ground level focus towards the heritage buildings. Use of complimentary material at the ground level of the tower will aid in minimizing impacts as well.</p>
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Table 8: Potential Indirect Impacts to the Downtown HCD

Indirect Impacts	Relevance to the Project
<p>Shadows created that alter the appearance of a heritage attribute or change the visibility of a natural feature or plantings, such as a garden.</p>	<p>Given that the proposed project will result in the construction of a proposed tower immediately within the heritage district, it is likely that the proposed project will result in shadows on the district. Given that the bulk of the district is located south of the subject property, shadow impacts on the district itself would be minimal. The district currently includes multiple high rise buildings.</p>
<p>Isolation of a heritage attribute from its surrounding environment, context, or a significant relationship.</p>	<p>The proposed project is not anticipated to isolate a heritage attribute or individual heritage building from its surrounding environment, context, or a significant relationship. Although the construction of the new tower may visually alter the views and relationship between the subject property and the adjacent Eldon House property and other properties in the district, it is not anticipated to isolate either structure or property.</p>
<p>Land Disturbance such as a change in grade that alters the historic patterns of topography or drainage.</p>	<p>Completion of the proposed project will result in land disturbance; however, the construction will be temporary in nature and is not anticipated to affect any historic patterns or result in permanent impacts to heritage resources. In addition, it is understood that archaeological assessments will be completed for the project, which will also assess the archaeological potential for the subject property.</p>
<p>Changes in Land Use such as rezoning a battlefield from open spaces to residential use, allowing new development of site alteration to fill in the formerly open spaces.</p>	<p>The proposed project will result in a change in use for the property. The property is currently being used for commercial purposes, but is proposed for use as commercial, residential, and public space purposes.</p>
<p>Obstruction of significant views or vistas from, within, or to a built and natural feature.</p>	<p>Given that the proposed project will result in the construction of a proposed tower immediately adjacent to a heritage structure on the same property and others in the vicinity such as Eldon House, it is likely that the proposed project will result in shadows on the property that may alter or change the visibility of the scale of the three heritage buildings and others in the</p>

Indirect Impacts	Relevance to the Project
	vicinity, and of their location along the Thames River described in the designating-by-laws and recognitions.

Based on the extensive cultural heritage value that the heritage conservation district exhibits and the large-scale development that is proposed, it is anticipated that the project has potential to result in both direct and indirect impacts to the identified cultural heritage value of the district. Specifically, the integration of the new tower with the heritage structures on site and in the vicinity has the potential to result in alterations. Views to and from properties in the district would be significantly altered as a result of the proposed tower. The impact would be lessened by the fact that this part of Downtown London is an area of intensification with a number of high-rise buildings already in place.

4.3 Shadow Impacts

The juxtaposition of the proposed tall building (40 storeys) adjacent to low to mid-rise 19th and early 20th Century heritage resources and landscapes necessitates a review of the impacts of shadows on buildings and landscapes in the vicinity, as required by the City of London for a complete application.

The applicant subsequently completed a shadow study to identify impacts of the development during quarterly intervals of the year: March 31st, June 21st, September 2nd and December 21st. These figures have been compared with the impacts on specific heritage resources in the vicinity of the development which include the Eldon House building, Eldon House Gardens, Harris Park and the subject buildings from 435 to 451 Ridout Street. Images of Shadow Impacts are attached in the Appendix to this report, and results of the study are provided in Table 8 below.

Table 9: Shadow Impacts

Eldon House Building		
March 21st	9:00 a.m.	No Shadow
	12:00 noon.	Shadow
	3:00 p.m.	No Shadow,
	5:00 p.m.	No Shadow
June 21st	9:00 a.m.	No Shadow
	12:00 noon.	Shadow
	3:00 p.m.	No Shadow
	5:00 p.m.	No Shadow
September 2nd	9:00 a.m.	No Shadow
	12:00 noon	Shadow
	3:00 p.m.	No Shadow
	5:00 p.m.	Shadow
December 21st	9:00 a.m.m	
	12:00 noon	Shadow
	3:00 p.m.	Partial Shadow
	5:00 p.m.	
COMMENTARY:		
Negligible shadow impact on Eldon House Building		

Eldon House Garden		
March 21st	9:00 a.m.	Partial Shadow
	12:00 noon.	Partial Shadow
	3:00 p.m.	Partial Shadow from trees only
	5:00 p.m.	Partial Shadow from trees
June 21st	9:00 a.m.	Partial Shadow
	12:00 noon.	Partial Shadow
	3:00 p.m.	Partial Shadow from Trees
	5:00 p.m.	Partial Shadow from Trees
September 2nd	9:00 a.m.	Partial Shadow
	12:00 noon	Partial Shadow
	3:00 p.m	Shadow from Trees only
	5:00 p.m	Shadow from Trees Only
December 21st	9:00 a.m.m	
	12:00 noon	Partial Shadow
	3:00 p.m.	Partial Shadow
	5:00 p.m.	
COMMENTARY		
Negligible shadow impact on Eldon House Gardens. Shadow moves through the site.		
Some shadow from existing tree canopy.		
Consultation with an arborist may be considered to determine the need to bolster future tree canopy with shade tolerant trees.		

Harris Park		
March 21st	9:00 a.m.	Partial Shadow
	12:00 noon.	No Shadow
	3:00 p.m.	No Shadow
	5:00 p.m.	No Shadow
June 21st	9:00 a.m.	Partial Shadow
	12:00 noon.	No Shadow
	3:00 p.m.	No Shadow
	5:00 p.m.	No Shadow
September 2nd	9:00 a.m.	Partial Shadow
	12:00 noon	No Shadow
	3:00 p.m.	No Shadow
	5:00 p.m.	No Shadow

December 21st	9:00 a.m.	
	12:00 noon	No Shadow
	3:00 p.m.	No Shadow
	5:00 p.m.	
COMMENTARY		
Negligible Shadow impact on Harris Park		

435, 441-447 and 451 Ridout Street		
March 21st	9:00 a.m.	Shadow from Court House
	12:00 noon.	No Shadow
	3:00 p.m.	Partial Shadow
	5:00 p.m.	Shadow – Partially from subject building
June 21st	9:00 a.m.	Shadow from Court House
	12:00 noon.	No Shadow
	3:00 p.m.	Partial Shadow
	5:00 p.m.	Partial Shadow including from subject buildings
September 2nd	9:00 a.m.	Shadow from Court House
	12:00 noon	No Shadow
	3:00 p.m.	Partial Shadow
	5:00 p.m.	Shadow Partially from subject buildings
December 21st	9:00 a.m.	
	12:00 noon	Shadow, partially from subject buildings
	3:00 p.m.	Shadow partially from subject buildings
	5:00 p.m.	
COMMENTARY		
Negligible Shadow impact. Shadow impacts in the afternoon from the buildings themselves.		

Due to the location of the subject development relative to buildings and landscapes to the east, no significant impact was identified on the Thames River, Labatt Park or the Black Friars-Petersville Heritage Conservation District.

The greatest impact from shadows on the Eldon House and grounds will be experienced in the winter when the sun is low in the sky. Because the greatest impact will be in the winter, there will be no negative impact as a result of shadows to the trees on the grounds. Ron Koudys, landscape architect involved in the project and a member of the Eldon House Board, notes that the gardens on the grounds are currently in shade as they are located under the trees. It is not anticipated that the increased shadows will negatively impact the trees and gardens on the Eldon House grounds.

With respect to shadows resulting from the height of the development, because the building is located right next door to the Eldon House there would be no difference to the shadow impact based on the height of the proposed tower once it is over 10-storeys tall. As in, the shadows resulting from the development will be the same if the building is 20-storeys or 40-storeys.

Overall due to the location of the subject development relative to other heritage sites, the design with its slender point tower, and existing impacts from tall buildings and features such as the Court House, it was determined that the impact on shadow and sunlight on heritage resources was negligible. The greatest potential impact appears to be in the vicinity of the Eldon House gardens which retain reasonable sunlight; however, as the greatest shadow impacts will occur in the winter impacts to vegetation are anticipated to be minimal.

4.4 Views and Vistas

Views to and from the Ridout Complex are important and identified in the designation by-law as features to be conserved as “Viewscape on the complex as a whole from surrounding streets”.

All three buildings are proposed to be conserved as part of this proposed development, The retention of the streetscape, combined with adjacent buildings would combine to create a strong street level heritage presence, as a result, views to and from the complex would remain unaltered.

Generally, views of the River are not achievable between the buildings of the Ridout Complex so development of the complex behind the Ridout Streetscape would not impede vistas.

The height of the tower would change the overall appearance of the site from a distance, however, this is mitigated by the fact that the subject area is home to a number of high-rise residential and employment buildings signifying the location of a major urban centre, which as the centre of the sixth largest city in Ontario, Downtown London is.

The Tower would change views of the downtown from the River as well as communities and public spaces, such as the Forks and Labatt Park, however, these views are already interspersed with multiple high-rise buildings meaning that the proposed tower would not look out of place on the skyline from these areas.

4.5 Impacts on the Thames River Corridor and “The Forks”

The Thames River is recognized as Canadian Heritage River and its importance in the natural and cultural development of the City of London is well documented. The policy framework which regulates cultural heritage, appearance and vistas of new development within the corridor are outlined in the Thames River Corridor. An analysis of relevant policies and the guidance provided by them related to this particular development is outlined and analyzed in Table 9 below.

Table 10: Impacts to the Thames River Corridor and Forks

POLICY	ANALYSIS AND COMMENTARY
<p>THAMES RIVER CORRIDOR PLAN Areas identified in the Corridor Plan as having significant Views and Vistas should be considered visually sensitive. New development, as potentially seen within these viewsheds, (or in other highly visible areas as may be identified through the planning and development process) should be subjected to a visual impact assessment to ensure that significant views into and from the Corridor are protected.</p>	<p>The Thames River Corridor plan references Views and vistas. There is no specifically defined vista identified, however, it is generally understood to be traditional views of the city from the time of early postcards.</p> <p>The view of the downtown from the Forks is a major vista as are others in the vicinity.</p> <p>The vista to the east from across the Thames already includes high rise buildings. The vistas are therefor anticipated to be not adversely impacted. While the subject proposal is taller than other high-rise buildings in the vicinity as a general rule, once a certain height is reached with higher density developments, the number of stories above that may be negligible other than shadow impacts and capacity of local services to accommodate higher densities.</p>
<p>THAMES RIVER CORRIDOR PLAN Areas of Special Interest North Branch 8. Harris Park (Figure 4a)</p> <p>Recommendation: A Master Plan is recommended to review the park’s potential and to develop recommendations and a plan for upgrading the park. The Plan should consider river hydrological functions; address the site’s physical issues; and identify an appropriate program and design that responds to current recreation needs and trends (as identified in the Parks and Recreation Strategic Master Plan) along with better integration with the Downtown</p> <p>THAMES RIVER CORRIDOR PLAN Referencing another site – the London Hydro Lands, the plan anticipates areas of intensification, noting that should this particular site area become an area for redevelopment the design parameters for Urban Noted and Edges would apply, and better connections to the TVP are needed.</p>	<p>The Thames River Plan appears to anticipate development of a higher density along its corridor. This is not specifically applicable to this area, but illustrates considerations related to higher densities along the waterfront.</p>
<p>LONDON PLAN (OFFICIAL PLAN)</p> <p>123_ Recognizing the important role of the Thames Valley Corridor, the following actions will be taken: 1. Promote and enhance the Forks of the Thames River and the Thames Valley Corridor as an important natural, cultural, recreational, and aesthetic resource within our city.</p>	<p>The view from the Forks to the City across the Ridout site already includes higher density buildings, so the proposed new construction would not violate an established low-density trend. The positive economic impact resulting from the proposed development has the potential to enhance the overall vitality of the area and use of public park facilities.</p>

POLICY	ANALYSIS AND COMMENTARY
<p>SUPPORT CULTURAL AND INNOVATIVE PROGRAMMING TO CREATE A CITY THAT EXUDES INNOVATION, VIBRANCY, CREATIVITY AND ENTREPRENEURIALISM</p> <p>539_ Improve the vibrancy of Dundas Street, our Cultural Corridor, which runs through Old East Village and the Downtown, and enhance connections to the Thames River.</p>	<p>The positive economic impact resulting from the proposed development has the potential to enhance the overall vitality of the area and use of public park facilities.</p>
<p>10. Create strong connections to the Thames River through our streets and pathways, and by including active frontages of Downtown development onto the Thames Valley Corridor wherever possible in conformity with the Environmental Policies of this Plan</p>	<p>The proposed development presents a strong podium and landscaped grounds to the riverfront and therefore achieves the policy of achieving an active riverfront frontage.</p>
<p>802. 3) The evaluation of height and built form will take into account access to sunlight by adjacent properties, wind impacts, view corridors, visual impacts on the Thames Valley Corridor, and potential impacts on public spaces and heritage properties located in close proximity to proposed development.</p>	<p>Impacts on sunlight and daylight are analysed elsewhere in this report, however, due to the location of the riverfront to the west of the subject site, the impact of shadowing or reduction of daylight on the Thames River corridor is minimal to none.</p>

A review of the relevant policy framework confirms that the proposed development is compatible with local and conservation authority the objectives of the Thames River Corridor. The subject building fronts onto the river and addresses the river front both in built form and in landscape in its design. The proposed development would serve to enhance the economic vitality of the immediate area resulting in better use and potential physical enhancement of the riverfront resulting from parkland dedication fees. The Tower is one of a number of high rise buildings in the vicinity and adds to the already established trend of a high rise downtown skyline as viewed from the Thames Valley.

4.6 Construction Related Impacts

The subject development may result in impacts within the property and upon adjacent properties related to vibration, construction activities and upon the health of mature vegetation.

It is anticipated that analysis of detailed impacts to the heritage buildings on the subject property and adjacent properties related to vibration and other construction practices would be documented and assessed by a qualified structural professional, and mitigation recommendations identified prior to commencement of excavation on the site, as well as a strategy for dealing with unanticipated impacts as a result of vibration during construction.

It is anticipated that analysis of detailed impacts to significant mature vegetation on the subject property and adjacent properties resulting from construction practices would be documented and assessed by a qualified arbourist, and mitigation recommendations identified prior to commencement of excavation on the site.

4.7 Record of Consultation

As part of the preparation of this HIA AECOM began the process of consultation with the City of London, as well as members of the Eldon House board. The AECOM heritage and Farhi development team have attended two meetings with the City of London project team, including Laura Dent, Heritage Planner, and Michael Tomazincic project lead, in late September and early October to review comments on the draft HIA report and discuss revisions to the scope of information included. Numerous update and planning calls, emails, and meetings have occurred throughout the revision process and it is expected that consultation with the city will continue.

Ron Koudys, of Ron Koudys Landscape Architects Inc. is the landscape architect for the development and also a member of the Eldon House Board. He has noted his conflict of interest to the board and continues to operate on both teams. AECOM spoke with Ron who has indicated that he sees a real opportunity for the Eldon House in working together with the Farhi team while developing this project. While any development near a heritage property of such significance as the Eldon House generates an emotional response, there are opportunities for the Eldon House in partnering with the Farhi development team. The Eldon House is located in the downtown core and is surrounded by high rise buildings, which will only increase as urban intensification continues. During the discussion Ron identified a number of opportunities that could be explored for the Eldon House to gain positives from this project, including an increased focus on the grounds of the Eldon House, creating a Horticultural Destination that would attract repeat tourists; reconnecting the Eldon House to the river flood plain could be completed, as was the case in the past during the time the Harris family lived there; and the possibility of engagement with Fanshawe college to conduct landscape classes in the gardens. Greater traffic of people to the Eldon House grounds would help reduce the transient population's use. Ron felt that by working together there could be benefits and funding made available to further Eldon House initiatives, and allowing the Eldon House board to have influence on the final design of the neighbouring development.

As this project moves forward consultation with the full Eldon House Board of Directors must occur in order to understand and incorporate their concerns and/or ideas. The project team would like to present to the Eldon House Board the design plans and listen to questions and comments the board has with the proposed plan for consideration. During the writing of this HIA members of both AECOM and Farhi Holdings have attempted to set up a meeting with Mark Tovey, Chairman of the Eldon House Board, and set a date for the presentation to the board. Numerous attempts to set dates have occurred over the month of November; however, due to other commitments we have been unable to arrange a time with Mr. Tovey for discussions. Tara Whitman, Curator at the Eldon House has been consulted and has indicated to the team that this time of year is very busy and availability is limited. On November 20 Mr. Tovey communicated that the Eldon House Board of Directors had no available time to meet with Farhi, nor the time to prepare for a meeting. Based on the need for the HIA to be submitted to further the re-zoning application process the city has agreed to accept this report as is, with the understanding that further consultation with the Eldon House Board of Directors is essential and must be conducted prior to site plan approval.

5. Consideration of Alternatives, Mitigation and Conservation Methods

There is no one correct way to mitigate the adverse impacts of new construction on, or adjacent to historic structures and/or heritage properties. Strictly from the perspective of best practice for heritage conservation, the preferred option is one that conserves a property's cultural heritage value. The Provincial Policy Statement, 2014, identifies the requirement to conserve cultural heritage value; specifically, Section 2.6.1 states, "Significant built heritage resources

and significant cultural heritage landscapes shall be conserved.”⁴ Typically, this involves maintaining a heritage resource *in situ*. In reality, socio-economic, technical, and/or environmental site considerations may require some form of compromise and/or alternate means of conservation.

The MTCS identifies mitigation or avoidance strategies that can be used to mitigate the extent of impacts as a result of a proposed undertaking. These include:

- Alternative development approaches;
- Isolating development and site alteration from significant built and natural features and vistas;
- Design guidelines that harmonize mass, setback, setting, and materials;
- Limiting height and density;
- Allowing only compatible infill and additions;
- Reversible alterations; and,
- Buffer zones, site plan control, and other planning mechanisms.

The subsection below outlines various forms of mitigation that should be considered more specifically for this project, when refining the proposed tower for the subject property. The mitigation options described below outline strategies which will mitigate the impacts described above. From the cultural heritage perspective, preserving and enhancing the cultural heritage value of the property should be considered a key opportunity and priority for this property and project.

Table 11: Mitigation Measures

ADDRESS	IMPACT IDENTIFIED	PROPOSED MITIGATION MEASURE (S)
<p>435 to 451 Ridout Street</p>	<p>Potential impact of the Tower design, scale and massing on the heritage environments of the subject properties, adjacent heritage districts and the Thames River Corridor</p>	<p>In order to mitigate the significant visual impacts that will be experienced on the property, the project should be designed in a manner that minimizes visual impacts or impacts to views to and from the subject property and its heritage buildings. Specifically, this should result in considerations about how the proposed tower will integrate with the historic structures.</p> <p>Some refinements that may assist in the transition between the historic structures include the siting of the tower in relation to the heritage structures, the use of a podium design to minimize the massing impact on the heritage structures, and the use of exterior materials as they relate to the historic building fabric.</p> <p>The current siting of the tower on the property, identifies that the tower is located towards the north end of the property and is located to the rear of the 451 Ridout Street North building. Where feasible, the footprint of the tower should be minimized in order to not visually overwhelm the heritage dwelling. Siting options for the tower on the property should continue to separate the heritage structures from the new development as much as possible, in order to allow for the two-to-three-storey streetscape appearance of the heritage buildings to remain a defining feature of this portion of Ridout Street North.</p>

⁴ Provincial Policy Statement, 2014.

		<p>The massing between the heritage buildings and the proposed tower should also be considered. The tower should be designed in manner that does not dominate the streetscape character or overwhelm the two- and three-story heritage buildings on the property. Given the scale of the proposed tower, it is inevitable that the massing will be an obvious juxtaposition in scale/mass; however, a podium design may assist in mitigating the impact of the height differences between structures. If the tower is designed to be set back from the heritage dwelling and the bottom stories of the tower are sensitive in terms of their design materials to allow for a sympathetic transition between the old and newer structures, the massing and scale of the tower may be reduced at the streetscape level.</p> <p>Lastly, some consideration should be given to the exterior materials for the tower and their relation to the heritage structures. It is assumed that glazing will be the defining exterior material of the building. If feasible, special consideration to the materials and design of the bottom few storeys should be given to consider a design approach that connects the two eras of architecture. For instance, the use of buff brick similar in appearance to the heritage structures could be considered for any decorative elements that could conceptually tie the structures together. The <i>Standards and Guidelines for the Conservation of Historic Places in Canada</i> should be consulted while refining the design in order to consider how the new development will relate to the existing heritage structures. Particularly, Standard 11 of the document captures the ways in which new development should be considered in a historic place. The standard states “Conserve the heritage value and character-defining elements when creating any new additions to an historic place or any related new construction. Make the new work physically and visually compatible with, subordinate to and distinguishable from the historic place.”⁵</p>
<p>435 to 451 Ridout Street</p>	<p>Potential impact on the usability of the heritage structures at 435 to 451 Ridout Street resulting from the adjacent development, access to parking, etc. and the need for identification of a suitable re-use</p>	<p>If the retention of the three heritage structures requires further adaptive re-use as a part of their on-going integration with the proposed project, suitable re-use opportunities should be identified and pursued for the structures. Heritage buildings are often at most risk when a suitable use is not found. If feasible, their continued commercial use is encouraged. If further re-use is required for the structures, the interior elements described within the designating by-laws and recognitions should be retained and preserved.</p>
<p>435 Ridout</p>	<p>Potential impact on the usability of 435 Ridout and appearance of the overall site in the long term while in a damaged condition</p>	<p>The structure known as 435 Ridout Street North should be restored to its previous condition, prior to the fire experienced within the structure in September 2018. Restoration efforts should be completed in a manner that preserves and enhances the property's cultural heritage value, and all conservation work should be</p>

⁵ *Standards and Guidelines for the Conservation of Historic Places in Canada, Second Edition, 2010.*

		<p>completed by qualified experts with heritage conservation experience.</p>
<p>435 Ridout, Eldon House and Harris Park</p>	<p>Potential Impact on the viability of mature vegetation and long-established gardens.</p>	<p>It is understood that plantings and naturalization activities will be completed for the proposed project on the west side of the property, but also along the border with the Eldon House property. When designing new plantings for the property, the Downtown Heritage Conservation District should be consulted for appropriate new plantings and streetscape enhancements that should be utilized for the property and its integration within the broader context.</p> <p>Public space proposed on the property should also be considered for historic interpretation. As a result of the various levels of heritage recognition and protection for the property, opportunities to include interpretative signage, or commemorative materials should be explored, so as to enhance the public awareness and knowledge of the history of the property, and its role within London's larger municipal history. These public spaces may also provide an appropriate space for public art, or installations that help enhance the relationship between the Thames River and the city.</p> <p>While the design of the proposed development is conceived to minimize the shadowing resulting from a building of this scale, there will be some increased shadowing on existing mature vegetation in the vicinity of Harris Park, the subject lands and on the Eldon House Museum property.</p> <p>A shadow study has been prepared as part of the complete application which identifies the level of increased shadowing that certain areas will receive.</p> <p>To mitigate any negative impacts resulting from increased shadowing, a qualified arborist should be retained to undertake an assessment of the long term impacts on existing vegetation and if it is determined that the Tree canopy would be impacted a landscape architect should be retained to identify shade tolerant plantings to be introduced to the site to maintain the tree canopy in the long term.</p>
<p>435 to 451 Ridout Street</p>	<p>Potential land disturbances from vibration caused by construction activities.</p>	<p>The effect of construction vibrations on heritage and/or historic structures is not fully understood, yet negative effects have been demonstrated on buildings with a setback of less than 40 metres from roadside. Given the proximity of the proposed construction activity to the heritage buildings, there is potential for the project to result in vibration impacts. In order to mitigate vibration impacts on the heritage buildings during construction, preconstruction building surveys and vibration monitoring should be carried out during construction to identify any adverse effects to this resource resulting from project related construction activities.</p>

Eldon House	Potential Land disturbances from vibration caused by construction activities	Vibration monitoring should be carried out during construction to identify any adverse effects to this resource resulting from project related construction activities.
466 Ridout Street North	Potential Land disturbances from vibration caused by construction activities	Vibration monitoring should be carried out during construction to identify any adverse effects to this resource resulting from project related construction activities.
468 Ridout Street North	Potential Land disturbances from vibration caused by construction activities	Vibration monitoring should be carried out during construction to identify any adverse effects to this resource resulting from project related construction activities.
470 Ridout Street North	Potential Land disturbances from vibration caused by construction activities	Vibration monitoring should be carried out during construction to identify any adverse effects to this resource resulting from project related construction activities.
472 Ridout Street North	Potential Land disturbances from vibration caused by construction activities	Vibration monitoring should be carried out during construction to identify any adverse effects to this resource resulting from project related construction activities.
435 to 451 Ridout Street	Avoiding potential impacts due to staging and construction through implementation of protection measures.	A plan should be developed for screening and protecting heritage buildings and mature vegetation including root areas and tree canopies and prior to staging and excavation commencing on the site.
Eldon House	Avoiding potential impacts due to staging and construction through implementation of protection measures.	A plan should be developed for screening and protecting heritage buildings and mature vegetation including root areas and tree canopies and prior to staging and excavation commencing on the site

5.1 Additional Studies Required

It is clear that additional studies will be required to assist in the mitigation of adverse impacts to the heritage buildings of the Ridout Complex. Through consultation with the City of London's Heritage Planner and Planning team a holding provision will be placed on the property to ensure the following studies are completed:

- Building Conditions Assessment Report, assessment is required before and after construction and should be subject to a peer review.
- Vibration Study, to assist in determining the level of vibration that would be acceptable to avoid negative impacts during construction.
- Heritage Conservation Plan, this should address the heritage attributes in the interior of the buildings as well as exterior features.
- Arborist Report, to effectively determine the impacts on vegetation and assist with tree preservation or replacement.
- Implementation and Monitoring

5.2 Mitigation Strategies

The table above identified potential mitigation measures to reduce adverse impacts of the proposed development identified on cultural heritage resources and attributes of the Downtown London HCD. Generally, five primary impacts were identified; the potential for vibration effects resulting from construction, the impact on the character of the area, impact of shadowing on mature vegetation, impact resulting from construction of a 40 storey building on site, the long-term use of the buildings at 435-451 Ridout Street, and potential impacts during the construction process.

In order to mitigate the potential direct and indirect impacts to identified cultural heritage values described within this report, the mitigation strategies described in this report should be considered in further project refinements and approaches. Details related to the exterior design, the streetscape character, and the future re-use of the heritage structures should be considered in depth as a part of the proposed project in order to mitigate impacts, and conserve the cultural heritage value of the property.

The impacts resulting from the proposed development are addressed below.

5.2.1 Vibration

Some impacts, such as the potential for vibration on properties within 40 metres of the proposed development, can be mitigated with vibration assessments to identify whether vibration from construction activities has affected historic masonry. It is recommended that an assessment occur before construction, to identify a benchmark for impacts, and post-construction, to identify whether impacts have occurred.

In order to prevent negative indirect impacts, the heritage resources should be isolated from construction activities. It is recommended that site plan controls be put in place prior to construction to prevent potential indirect impacts as a result of the Project. The site plan control methods shall be determined in advance of construction by the proponent to indicate where Project activities are restricted as described below. These controls should be indicated on all construction mapping and communicated to the construction team leads. It is recommended that a buffer zone be established where no construction activities can occur. The proponent's construction team should monitor that buffer zone delineation, outlining the limit of the construction footprint and subsequent setback from heritage features, is maintained throughout construction. A qualified building condition specialist should be retained to determine if any damage was incurred as a result of the construction activities.

5.2.2 Mature Vegetation

The existence and health of mature vegetation is important to maintaining the character of the area, the heritage district, public realm and heritage properties. Impacts from construction due to construction activities or long-term shadowing increases should be planned for and mitigated where feasible. It is understood some that trees at the limit of the Eldon House property will be removed in order to construct this development.

- The completed shadow study shows that all vegetation has access to sunlight at all times of the year. Review by a qualified arborist would be necessary to determine whether the new lighting conditions would be sufficient to maintain the health of the existing tree canopy and if there is concern a landscape architect should be retained to determine the potential for new plantings on the site and adjacent public sites to replenish the tree canopy in the long term.

A plan should be developed and implemented prior to disturbance of the site to the satisfaction of a qualified arborist to ensure protection of vegetation during the staging, excavation and construction process.

5.2.3 Existing Ridout Block Buildings

The successful rehabilitation and integration of the buildings of the Ridout Block National Historic Site within the new development is key to ensuring that the cultural heritage resources on the existing site are retained and preserved for the future. A detailed timed and budgeted plan should be developed to achieve the full restoration and integration of the Ridout Block buildings into the complex.

5.3 Heritage Impact Assessment Update

Upon further design refinement, this HIA should be updated in order to capture any design alterations or changes that have been made to the proposed site plan or tower design to reflect the heritage conservation efforts as a part of the proposed development. Continued consultation with City of London Heritage Planning staff is encouraged as a follow-up step in order to ensure that the significant heritage attributes and cultural heritage value of the property will be conserved as a part of the proposed development. Due to the extensive cultural heritage value of this property, collaboration with Heritage Planning staff will ensure that the mitigation strategies will be appropriately identified and undertaken in order to preserve and enhance the heritage value of the site.

6. Summary Statement of Conservation Recommendations

The subject property contains and is surrounded by a wealth of cultural heritage and natural heritage resources. The site itself has designation under Part IV and Part V of the Ontario Heritage Act and is also a National Historic Site, together with adjacent features such as Eldon House Museum, the valley of the River Thames, designated a Canadian Heritage River and nearby listed and designated properties, such as the London Museum and Old Middlesex County Court house comprise a landscape almost unprecedented in Ontario for its significance and level of protection.

The site is also within the growing downtown core of the sixth largest city in Ontario and has been identified as an area for intensification.

The proponent of the project has recognized the significance of the site by proposing to retain all heritage resources on site. The following recommendations serve to provide a guideline and a plan to ensure that the heritage of the site and environment is protected.

Properties within and adjacent to the proposed development site contain cultural heritage resources. Based on the impacts identified to cultural heritage resources, the following mitigation measures are recommended:

Establish a 40 metre buffer, or the maximum possible, between construction activities and structures identified as cultural heritage resources during the construction phase for the properties located at:

- 435 Ridout Street North
- 441 Ridout Street North
- 451 Ridout Street North
- 481 Ridout Street (Eldon House)

- 468 Ridout Street North
- 470 Ridout Street North
- 472 Ridout Street North
- 466 Ridout Street North

Monitor vibration on adjacent identified cultural heritage resources before and after the construction phase is completed.

Develop a plan, timeline and budget for the conservation and use of the Ridout Block Buildings at 435, 441 and 451 Ridout Street.

Continue to utilize high quality materials such as brick inspired by the Ridout Buildings and glazing as the primary materials of the proposed new building to achieve compatibility with the existing heritage context.

Continue to utilize the podium and point tower massing as proposed which provides the optimal scale and mass for integration of this scale of building into the historic context

Retain the services of a qualified arborist to undertake a review of the shadow impact plan to determine the long-term health of the mature tree canopy on the Eldon House and adjacent Harris Park. If concerns are identified with the long term health of the tree canopy, retain the services of a landscape architect to identify a planting plan for shade tolerant species of trees to maintain the tree canopy in the long term.

7. Closure

This report has been prepared for the sole benefit of Farhi Holdings Corporation and may not be used by any third party without the express written consent of AECOM Consulting Ltd. Any use which a third party makes of this report is the responsibility of such third party.

We trust this report meets your current requirements. Please do not hesitate to contact us should you require further information or have additional questions about any facet of this report.

8. Sources

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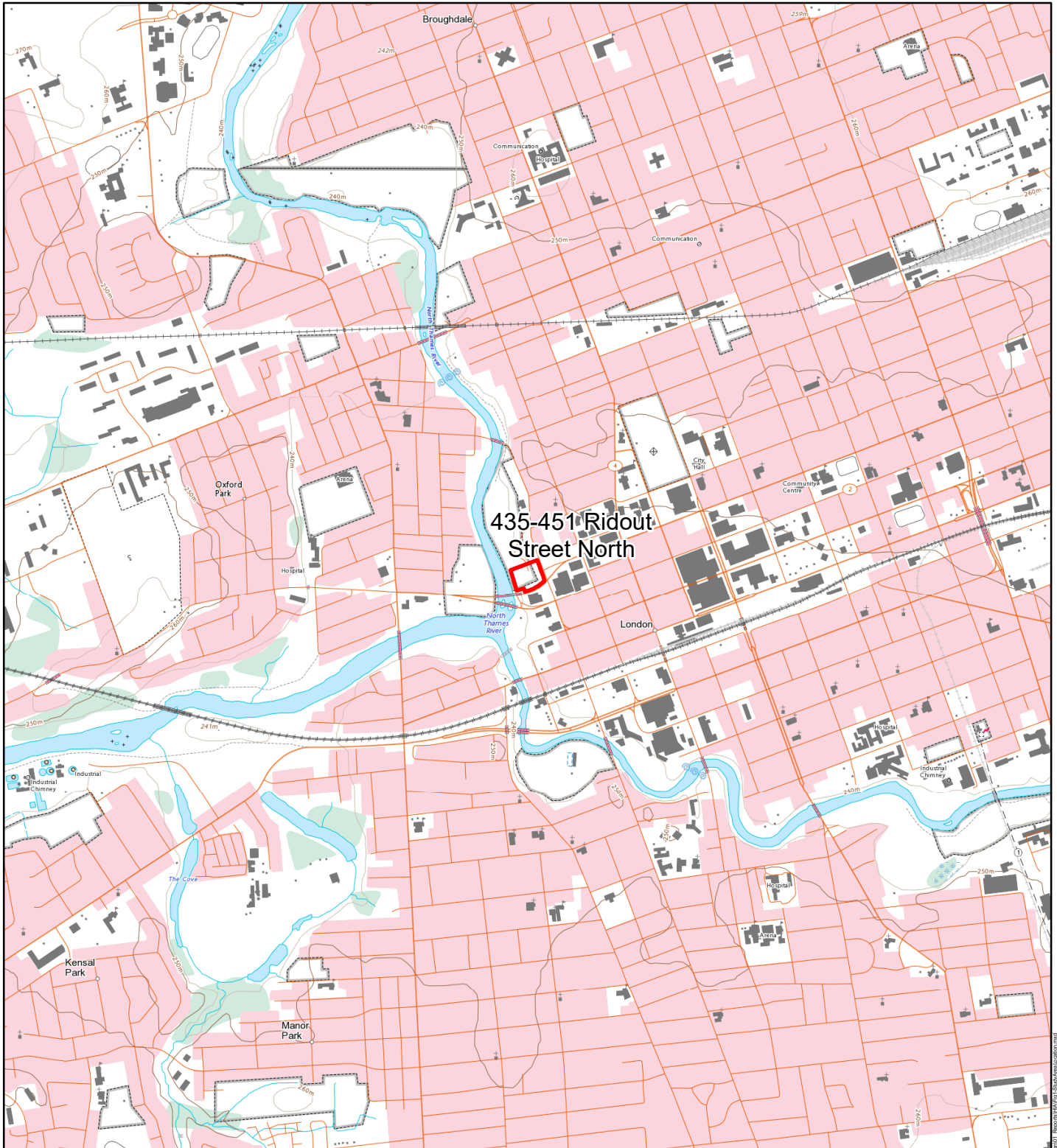
http://www.pc.gc.ca/docs/pc/guide/nldclpc-sgchpc/index_E.asp

Parks Canada National Historic Sites of Canada


http://www.pc.gc.ca/progs/lhn-nhs/index_e.asp

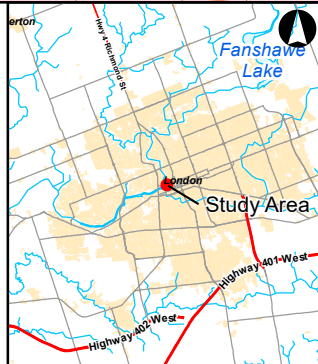
9. Figures

The following section provides the figures referred to in this report.



Legend

 Study Area



Heritage Impact Assessment
435-451 Ridout Street North
London, Ontario

Location of Study Area

November 2019

1:25,000

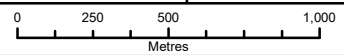
Datum: NAD 83 UTM17
Source: http://wms.ess-ws.nrcan.gc.ca/wms/toporama_en

PH: 60587405

V#:

AECOM

Figure 1



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Map Source: http://wms.ess-ws.nrcan.gc.ca/wms/toporama_en (2019-11-08 10:14:10 AM EST) | Data Source: http://wms.ess-ws.nrcan.gc.ca/wms/toporama_en (2019-11-08 10:14:10 AM EST)



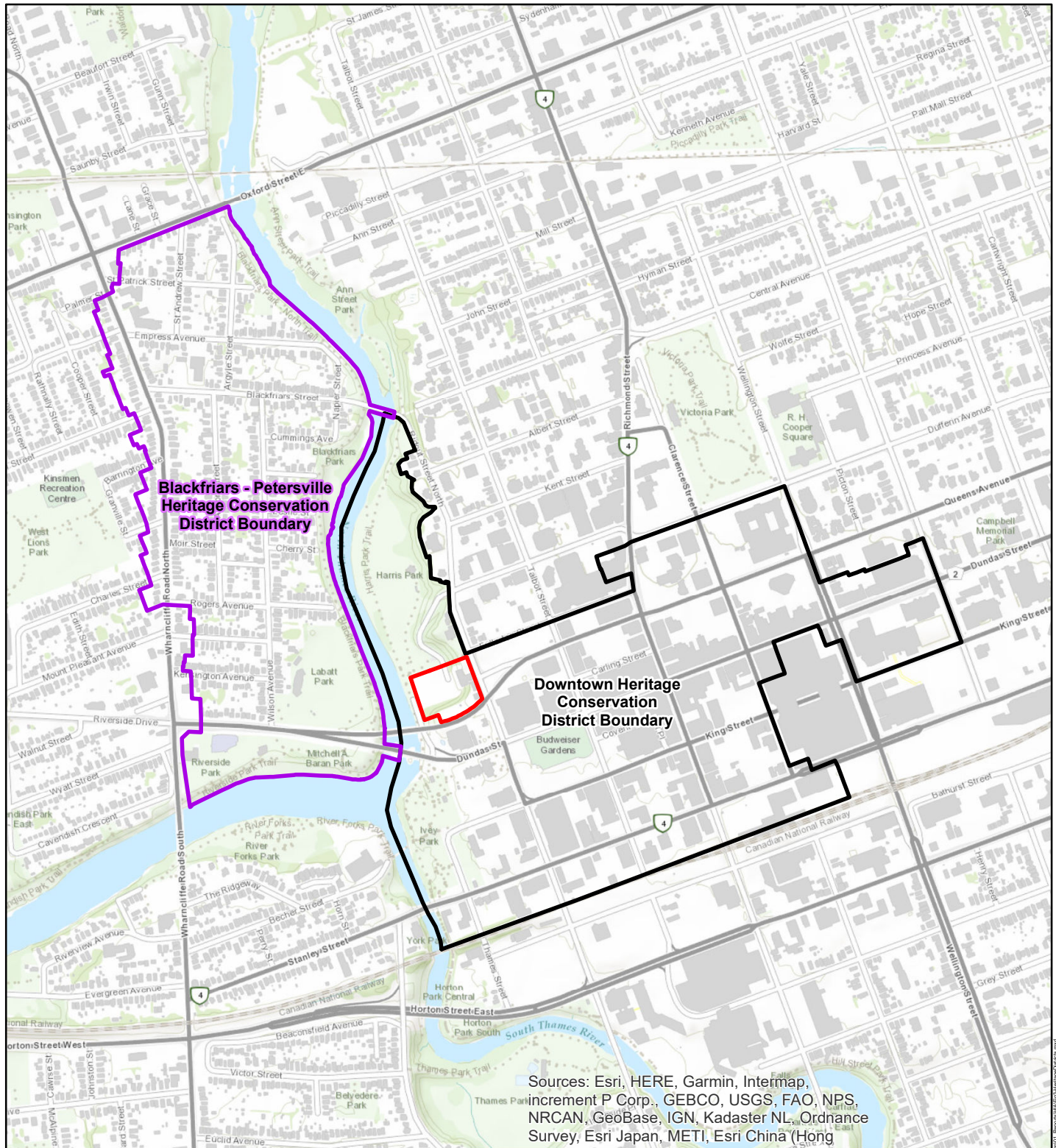
Legend

Study Area






Heritage Impact Assessment 435-451 Ridout Street North London, Ontario		
Study Area in Detail		
November 2019	1:1,000	Datum: NAD 83 UTM17 Source: LIO 2016, City of London 2017
PH: 60587405	V#:	
AECOM		Figure 2
0 10 20 40 Metres		
<small>This drawing has been prepared for the use of AECOM's client and may not be used, reproduced or relied upon by third parties, except as agreed by AECOM and its client, as required by law or for use by governmental reviewing agencies. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that modifies this drawing without AECOM's express written consent.</small>		

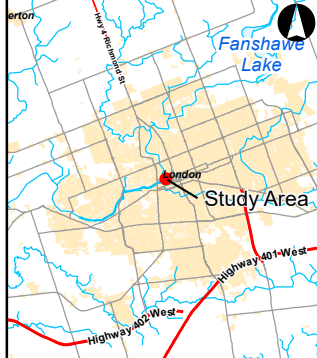
Map Source: Microsoft Bing; Aerial Imagery: Google Earth; GIS Data: Esri; Photo: Rick Klunz / iStockphoto.com; GIS: Design Intelligence

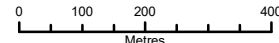


Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong

Legend

-  Study
-  Blackfriars - Petersville Heritage Conservation District Boundary
-  Downtown Heritage Conservation District Boundary



Heritage Impact Assessment 435-451 Ridout Street North London, Ontario		
Heritage Districts		
November 2019	1:12,000	Datum: NAD 83 UTM17 Source: City of London 2019
PH: 60587405	V#:	
AECOM		Figure 3
		
<p>This drawing has been prepared for the use of AECOM's client and may not be used, reproduced or relied upon by third parties, except as agreed by AECOM and its client, as required by law or for use by governmental reviewing agencies. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that modifies this drawing without AECOM's express written consent.</p>		

Map Source: Microsoft Bing Maps, Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), Swisstopo, DeLorme, NAVTEQ, United States National Geographic Imagery, Esri, Swisstopo, DeLorme, NAVTEQ, United States National Geographic Imagery, Esri, Swisstopo, DeLorme, NAVTEQ, United States National Geographic Imagery



Legend

- Study Area
- Heritage Property
- Blackfriars - Petersville Heritage Conservation District Boundary
- Downtown Heritage Conservation District Boundary



Heritage Impact Assessment 435-451 Ridout Street North London, Ontario		
Heritage Features		
November 2019	1:2,500	Datum: NAD 83 UTM17 Source: LIO 2016, City of London 2018
PH: 60587405	V#:	
AECOM		Figure 4
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Map Source: Google Earth Pro (2019-08-08 10:00:00 AM EDT), City of London GIS (2018-08-08 10:00:00 AM EDT), City of London GIS (2018-08-08 10:00:00 AM EDT), City of London GIS (2018-08-08 10:00:00 AM EDT)

FARHI HOLDINGS - 451 RIDOUT STREET



- NEW CONSTRUCTION
- EXISTING HERITAGE STRUCTURES TO REMAIN AS IS

SITE / FLOOR PLAN AT STREET LEVEL (49 SURFACE PARKING SPACES)



10. Resumes

The following section includes the resumes of people who contributed to the preparation of this HIA report.

Adria Grant, MA, CAHP

Ontario Department Manager – Impact, Assessment & Permitting

Education

Bachelor of Art (Hons),
Anthropology & English. University
of Western Ontario, 2000

Master of Art, Applied
Archaeology. University of
Western Ontario, 2016

Years of Experience

With AECOM: 6
With Other Firms: 13

Licenses/Registrations

Ontario Ministry of Tourism,
Culture and Sport (MTCS)
Professional Archaeological
License (P131)

Canadian Association of Heritage
Professionals (CAHP)

Ontario Association of Professional
Archaeologists (APA)

RAQS Certification

Memberships

Canadian Archaeological Society

Ontario Archaeological Society

Summary

Adria Grant has been active in the field of cultural resource management since 1999, specializing in cultural heritage and archaeological assessments for provincial and federal government, municipal corporations, and private sector organizations. Adria is an experienced project manager having completed formal project management training through the Project Management Institute (PMI) as well as comprehensive and stringent company specific project management courses during her employment at Golder Associates, Stantec and AECOM. Adria consistently applies the knowledge, tools, and techniques of project management practices to the heritage field, streamlining processes and procedures to achieve client objectives. Adria has a wealth of experience working with municipal heritage planners in the context of development activities and has the ability to provide sound technical advice to proponents on the heritage process in Ontario.

Adria is professionally licensed by the Ontario MTCS, is a member of the Canadian Association of Heritage Professionals and the Ontario Association of Professional Archaeologists. In addition to professional memberships Adria actively participates in local heritage and archaeological events and is active and well known within the cultural resource community. She currently acts as the Department Manager of the Impact, Assessment & Permitting - Cultural Resources, Planning and Communications teams in Ontario, and Canadian lead for AECOM's North American Cultural Resources team.

Experience

Metrolinx, Ontario Line West Cultural Heritage Assessments, Toronto, Ontario. Technical lead for heritage assessments to support the construction of a new rail corridor to improve transit within the city of Toronto. Provided technical support to assist Metrolinx and the Ontario MTCS in creating project specific work plan procedure with a unique strategy for reporting. Will be responsible for consultation with the MTCS, senior review and technical excellence.

Metrolinx, Ontario Line North Cultural Heritage Assessments, Toronto, Ontario. Technical lead for heritage assessments to support the construction of a new rail corridor to improve transit within the city of Toronto. Provided technical support to assist Metrolinx and the Ontario MTCS in creating project specific work plan procedure with a unique strategy for reporting. Will be responsible for consultation with the MTCS, senior review and technical excellence.

Farhi Holding Corporation, 120 York Street Heritage Impact Assessment, London, Ontario. Project manager for a HIA to support the demolition of a structure located within the Downtown Heritage Conservation District. Responsible for senior review of the report.

County of Bruce, Old Reid Bridge Cultural Heritage Evaluation Report, Teeswater, Ontario. Senior review of cultural heritage evaluation report for the removal of an abandoned bridge in Bruce County.

City of London, Downtown Sewer Separation Phase 3, Heritage Impact Assessment, London, Ontario. Senior reviewer for HIA completed to evaluate impacts of infrastructure improvements within the Downtown Heritage Conservation District and adjacent to numerous listed or otherwise recognized heritage buildings.

City of London, 78-88 Oxford Street Cultural Heritage Evaluation Report, London, Ontario. Project manager for the CHER of a row of six residential structures in the City of London that will be negatively impacted by proposed road widening. The CHER determined that the houses as a group had cultural heritage value and would be eligible for designation.

Metrolinx Ontario Line South Cultural Heritage Assessments, Toronto, Ontario. Technical lead for heritage assessments to support the construction of a new rail corridor to improve transit within the city of Toronto. Gap analysis to be completed to determine

Union Gas, Stratford Reinforcement Project Cultural Heritage Evaluation Report, Perth County, Ontario. Project manager for the CHER conducted as part of an Environmental Assessment for a natural gas pipeline twinning project. The study involved a windshield study, the identification of built heritage and cultural heritage landscapes, creation of a heritage inventory, and the assessment of impacts to identified cultural heritage resources. The report included the direct application of the *Ontario Heritage Toolkit* and the *Cultural Heritage and Archaeology Policies of the Ontario Provincial Policy Statement, 2005*.

MHBC Planning, Cobourg Heritage Master Plan, Cobourg, Ontario. Technical specialist providing information on archaeological heritage resources and archaeological management of resources for the background Heritage Report and Heritage Master Plan created for the Town of Cobourg. The document is intended to provide high level legal advice to Town staff on a variety of conservation matters.

York Region, Stouffville Road Improvements Cultural Heritage Evaluation Report, Regional Municipality of York, Ontario. Technical lead for the CHER conducted as part of an Environmental Assessment for the proposed realignment of Stouffville road east of Yonge Street. Research identified a cultural heritage conservation district, listed and designated heritage structures as well as cultural heritage landscapes that should be considered during project design. A Heritage Impact Assessment was recommended once project design was better understood to mitigate any negative impacts to the identified heritage resources.

City of Toronto, Heritage Impact Assessment - Downsview Secondary Area Plan, Toronto Ontario. Primary researcher and technical lead for the HIA conducted as part of the Downsview Secondary Area Plan redevelopment. Numerous built heritage features are present within the study area, impacts to heritage features were assessed and it was determined that there were no anticipated direct or indirect impacts as a result of the undertaking.

Metrolinx, Technical Cultural Resource Services - Eglinton Crosstown Light Rail Transit (ECLRT), Toronto, Ontario. Peer reviewer of cultural heritage evaluation, assessment and impact assessment reports for the project. Provided strategic advice to the greater project team in relation to heritage requirements and conducted gap analysis.

Varna Wind Inc., Bluewater Wind Energy Centre Heritage Assessment Addendum, Huron County, Ontario. Technical specialist for an addendum to the original Heritage Assessment Report, conducted as part of an Application for a Renewable Energy Approval under Ontario Regulation 359/09 made under the *Environmental Protection Act*. The additional participating properties were screened for potential heritage resources and if potential heritage resources were identified they were evaluated according to the criteria outlined in O. Reg. 09/06 under the *Ontario Heritage Act*, as required by O. Reg. 359/09. A total of 49 structures were identified as as having cultural heritage value or interest according to O. Reg. 09/06. No further mitigation was recommended as it was determined that there were no anticipated direct or indirect impacts as a result of the undertaking.

Goshen Wind Inc., Goshen Wind Energy Centre Heritage Assessment Addendum, Huron County, Ontario. Technical specialist for an addendum to the original Heritage Assessment Report, conducted as part of an Application for a Renewable Energy Approval under Ontario Regulation 359/09 made under the *Environmental Protection Act*. The additional participating properties were screened for potential heritage resources. No features were identified as as having cultural heritage value or interest according to O. Reg. 09/06. No further mitigation was recommended as it was determined that there were no anticipated direct or indirect impacts as a result of the undertaking.

Jericho Wind Inc., Jericho Wind Energy Centre Heritage Assessment Addendum, Lambton and Middlesex Counties, Ontario. Technical specialist for an addendum to the original Heritage Assessment Report, conducted as part of an Application for a Renewable Energy Approval under Ontario Regulation 359/09 made under the *Environmental Protection Act*. The additional participating properties were screened for potential heritage resources and if potential heritage resources were identified they were evaluated according to the criteria outlined in O. Reg. 09/06 under the *Ontario Heritage Act*, as required by O. Reg. 359/09. A total of 51 structures were identified as as having cultural heritage value or interest according to O. Reg. 09/06. No further mitigation was recommended as it was determined that there were no anticipated direct or indirect impacts as a result of the undertaking.

NextEra Energy Canada ULC, Northpoint Wind Energy Centre, Eastern Ontario. Project manager for the identification and assessment of cultural heritage resources within the proposed limits of a large wind energy centre. Research included searches of the Ontario Heritage Properties Database, Parks Canada, municipal heritage planners, the Canadian Register of Historic Places, the Ontario Heritage Trust Plaques Database, and unregistered and registered cemetery databases.

NextEra Energy Canada ULC, Northpoint Wind Energy Centre Transmission Line, Eastern Ontario. Project manager for the identification and assessment of cultural heritage resources for a proposed transmission line related to a wind energy centre. Research included searches of the Ontario Heritage Properties Database, Parks Canada, municipal heritage planners, the Canadian Register of Historic Places, the Ontario Heritage Trust Plaques Database, and unregistered and registered cemetery databases.

MHBC Planning, Toronto Garden Heritage Conservation District Technical specialist providing information on archaeological heritage resources and archaeological management of resources for Toronto Garden District HCD Report.

Trout Lake I Solar, LP, LRP Cultural Heritage Resources Review, Trout Lake I Solar Energy Centre. Technical lead for information gathering as part of the LRP process related to heritage and archaeology. Research included searches of the Ontario Heritage Properties Database, the City of London Inventory of Heritage Resources, the Canadian Register of Historic Places, the Ontario Heritage Trust Plaques Database, and unregistered and registered cemetery databases.

Battersea Solar, LP, LRP Cultural Heritage Resources Review, Battersea Solar Energy Centre. Technical lead for information gathering as part of the LRP process related to heritage and archaeology. Research included searches of the Ontario Heritage Properties Database, the City of London Inventory of Heritage Resources, the Canadian Register of Historic Places, the Ontario Heritage Trust Plaques Database, and unregistered and registered cemetery databases.

Cordukes Solar, LP, LRP Cultural Heritage Resources Review, Cordukes Solar Energy Centre. Technical lead for information gathering as part of the LRP process related to heritage and archaeology. Research included searches of the Ontario Heritage Properties Database, the City of London Inventory of Heritage Resources, the Canadian Register of Historic Places, the Ontario Heritage Trust Plaques Database, and unregistered and registered cemetery databases.

Trout Lake I Solar, LP, LRP Cultural Heritage Resources Review, Trout Lake I Solar Energy Centre. Technical lead for information gathering as part of the LRP process related to heritage and archaeology. Research included searches of the Ontario Heritage Properties Database, the City of London Inventory of Heritage Resources, the Canadian Register of Historic Places, the Ontario Heritage Trust Plaques Database, and unregistered and registered cemetery databases.

Clarabelle I Solar, LP, LRP Cultural Heritage Resources Review, Clarabelle I Solar Energy Centre. Technical lead for information gathering as part of the LRP process related to heritage and archaeology. Research included searches of the Ontario Heritage Properties Database, the City of London Inventory of Heritage Resources, the Canadian Register of Historic Places, the Ontario Heritage Trust Plaques Database, and unregistered and registered cemetery databases.

Clarabelle II Solar, LP, LRP Cultural Heritage Resources Review, Clarabelle II Solar Energy Centre. Technical lead for information gathering as part of the LRP process related to heritage and archaeology. Research included searches of the Ontario Heritage Properties Database, the City of London Inventory of Heritage Resources, the Canadian Register of Historic Places, the Ontario Heritage Trust Plaques Database, and unregistered and registered cemetery databases.

Clarabelle III Solar, LP, LRP Cultural Heritage Resources Review, Clarabelle III Solar Energy Centre. Technical lead for information gathering as part of the LRP process related to heritage and archaeology. Research included searches of the Ontario Heritage Properties Database, the City of London Inventory of Heritage Resources, the Canadian Register of Historic Places, the Ontario Heritage Trust Plaques Database, and unregistered and registered cemetery databases.

Northpoint I, LP, Northpoint I Wind Energy Project. Technical lead for information gathering as part of the LRP process related to heritage and archaeology. Research included searches of the Ontario Heritage Properties Database, the City of London Inventory of Heritage Resources, the Canadian Register of Historic Places, the Ontario Heritage Trust Plaques Database, and unregistered and registered cemetery databases.

Northpoint II, LP, Northpoint II Wind Energy Project. Technical lead for information gathering as part of the LRP process related to heritage and archaeology. Research included searches of the Ontario Heritage Properties Database, the City of London Inventory of Heritage Resources, the Canadian Register of Historic Places, the Ontario Heritage Trust Plaques Database, and unregistered and registered cemetery databases.

Michael J. Seaman, BES, MEDS, MCIP, RPP, CAHP, CMA

Senior Heritage Planner

Education	Years of Experience	Memberships	Training and Certifications
Masters of Environmental Design Studies, Conservation, Faculty of Architecture, Dalhousie University, NS (Technical University of Nova Scotia), 1995	With AECOM: <1 With Other Firms: 28	American Planning Association, 2016-Present National Main Street Centre (USA), 2013-Present National Trust for Canada, 1999-Present US National Trust, 2013-Present	Next Gen Municipal Leadership Certificate Program, Brock University, 2014 Building Effective Leaders Program, Sheridan Corporate, 2008 Media Relations Training, Perfect 10 Communications, 2004 Exchange Module in Planning in the UK, Oxford Brookes University (Oxford Polytechnic), UK, 1991 Various Continuous Professional Learning Courses through Municipal Learning Programs (Managing in a Union Environment, Employee Empowerment, Essentials of Management, Delegation, Emergency Management, Accessibility)
Honours Bachelor of Environmental Studies, Honours Co-op Urban and Regional Planning, University of Waterloo, 1992	Professional Affiliations Member of the Canadian Institute of Planners Registered Professional Planner Member of the Canadian Association of Heritage Professionals Member of the Canadian Museums Association		
Completed Two Credit Course in Archaeology, Saint Mary's University, NS, 1994			

Michael Seaman has over 28 years of experience in progressive municipalities providing quality level urban planning service, including extensive municipal management experience. He is recognized nationally and provincially as a proactive, resourceful, and collaborative planner and Director with a diverse portfolio who achieves positive results. He has a proven record of accomplishment of Municipal professional leadership, strategic vision and staff management success in a public service environment as well as additional leadership experience as a member of national boards of directors, and municipal committees. Michael has demonstrated a high level of achievement of best practices and positive results in a municipal planning and development environment, including seven national and four provincial major awards. He possesses strong communication, facilitation, negotiation and relationship building skills from over two decades of diverse and complex projects involving a broad array of internal and external stakeholders, and has a deep understanding and application of legislation/regulations affecting municipalities in Ontario, contemporary issues in local government.

With a strong background in urban planning, downtown revitalization, special events, design, heritage conservation, economic development, communication, marketing and tourism, Michael is a recognized leader in developing, promoting and implementing best practices in urban design. With more than 20 years of working closely with building approvals and inspection and enforcement processes through heritage related work, coordination of restoration projects, as well as conventional municipal development planning. He has strong interpersonal, communication and report writing skills, and a superb ability to use independent judgment, with an unmatched record of success in good planning and achieving results as part of a management team. Michael has the ability to train and manage subordinate staff, and is recognized by peers as an expert in field, serving as Chair of the Board of Governors of the National Trust for Canada, past member of the Board of CAHP, heritage editor for OPPI Journal.

Experience Prior to AECOM

National Trust for Canada, Chair of the Board of Governors. Principal Officer of Canada's leading national charity related to heritage conservation. Established by the Government of Canada in 1973, The National Trust for Canada is a national charitable not-for-profit organization that leads and inspires action for historical places in Canada. Presides over a National Board of Directors and oversees its activity. Senior representative of the board in working with Chief Executive Officer on matters related to budget and financial sustainability, human resources matters, performance management, governance, advocacy, staff and board recruitment and succession, property management, and fundraising. October 2018-present.

Municipality of Clarington, Director of Planning Services, Bowmanville, Ontario. Led the Planning and Development Function and a team of 35 staff. Part of the Durham GO Train Team, land acquisition portfolio, Community Planning and Urban Design and Special Projects (Agriculture, Nuclear, Heritage, Environment), and Development Review. Department work included nine new and updated secondary plans, comprehensive zoning by-law. Feb.-June 2019.

Town of Grimsby, Director of Planning, Grimsby, Ontario. Led the Town of Grimsby Planning Department as Planning Director, leading a team of six staff and four committees, and leading the Town's Economic Development and Heritage Planning

portfolios. Also oversaw the Development Planning Function in a rapidly growing municipality, and led the Urban Design Function. Responsible for guiding Downtown Revitalization through implementation of the Community Improvement Plan and Main Street Committee. Coordinated the Comprehensive Zoning By-law Review, coordinated the Development Charge Study, and led the Transit Investigation. Coordinated the commenting, approval and appeal Process for completion of a new Official Plan, and a West End Waterfront Master Plan and Trail Plan Study and Hospital Corridor Secondary Plan. Coordinated Grant Applications achieving almost \$2-million in project specific grants to the municipality for the waterfront, public realm and community stakeholders (downtown revitalization). Involved attendance and testimony at Ontario Municipal Board Hearings, working with Niagara Area Planners and Niagara Region to advance the planning function in Niagara, participating in and implementing process improvement initiatives at the municipal and regional level. Municipal Lead in Regional Studies and Initiatives (Greenbelt Plan: Niagara Perspective, GO Train Attraction, GO Hub Study). Administering Department and committee budgets (\$922,000). Coordinated the Town's Economic Development Strategy, led the Town's response to the Greenbelt Plan Review, and led Grimsby's Tourism strategy, including coordinating the Community Video Series. Instigated and Coordinated Prototype Doors Open Grimsby and Happening on the Street Festivals, a successful tourism generator and community building event. 2010 – February 2019.

Town of Oakville, Manager of Heritage Planning, Oakville, Ontario. Managed the Heritage Planning Division, including hiring and supervision. Established the Heritage Planning Division – a new division within planning department. Developed productive working relationships with a variety of internal and external stakeholders to achieve municipal objectives related to heritage conservation and new development in older communities; reviewed and provided commentary related to development applications, building permits and heritage permits. Set and implement annual and long-term work plan with the aim of achieving national leadership in heritage conservation. Helped make Oakville the recognized leader in heritage conservation planning in Canada through winning of the Lt. Governor's Ontario Heritage Award for Community Leadership and Prince of Wales Prize. Administered a \$300,000 budget for the heritage planning division. Developed and refine planning policies. Of greatest significance was the development of policies for the new Official Plan related to heritage, older communities (Bronte, Palermo Village, Old Oakville), urban design and sustainability. Another significant policy related work was the development of policies and undertaking of studies related to the North Oakville Secondary Plan. These included a heritage resource strategy for the entire urban expansion area, and a study of the community of Palermo Village. Administered inspections, enforcement and permitting related to heritage properties, working closely with building department and by-law enforcement division staff. Provided expert advice to Council, committees and public and give testimony before provincial boards. Coordinated inspections and enforcement related to heritage buildings and areas. Served as lead municipal contributor to "Conserve Preserve", a handbook for heritage and sustainability. 2008 – 2010.

Town of Aurora, Community Planner, Aurora, Ontario. Managed the Community Planning Division including hiring and supervision, Development of work plan and budget for the division. Coordinated complex and high-profile development applications (subdivision, major commercial). Provided internal leadership in urban design – reviewing all types of projects (industrial, major commercial, subdivision, infill, streetscaping). Provided commentary related to urban and building design and heritage conservation on development applications. Reviewed and coordinated planning staff reports to the committee of adjustment. Hired and supervised contract support staff and consultants. Worked with Economic development to develop and implement a strategy for enhancing the economic viability of the downtown through focussing on existing strengths. Worked with the Public Works department to provide municipal review and commentary related to infrastructure and public works projects (Wellington Street Median, York Region Transit). Coordinated the Northeast Old Aurora Heritage Conservation District Study and implemented the pre-consultation for the southeast Old Aurora heritage conservation district study. Instigated and collaborated with the leisure services department and other local partners to establish Doors Open Aurora, a successful local tourism generator. Coordinated the heritage planning function of the Municipality. Helped make Aurora the recognized leader in heritage conservation planning in Canada through winning of the Prince of Wales Prize for municipal heritage leadership in Canada. Implemented policy and programs (Evaluation System, Heritage District Studies). Coordinated development applications: major commercial, residential plan of subdivision, site plan control, Rezoning, OPA. Reviewed building permits and heritage permits in the heritage resource area including all of Old Aurora and related to heritage resources. Developed and implemented policy and procedures. Implemented education and outreach programs including website, publications and in-house training. 2005-2008.

Town of Markham, Markham, Ontario. 1995 – 2005. Senior Planner, 2001-2005 / Planner II, 1999-2001 / Planner, Heritage and Conservation, 1995-1999. Processed development applications: Rezoning, Site Plan Approval, Plans of Sub- Division, Official Plan Amendments, Plan of Condominium, Committee of Adjustment Applications. Participated in the development of secondary plans in urban expansion areas. Implemented and educated principles of New Urbanism. Provided internal leadership in Urban Design and Building Design review for development applications in the four heritage conservation districts (Markham Village, Unionville, Thornhill, Buttonville) and all inventory properties town wide. Developed and coordinated policy and guidelines (Unionville Heritage Conservation District Plan; Design Guidelines for Townhouses and awnings; Markham Heritage Estates Building Envelope Review Study; Heritage District Identification Study; Main Street Façade Improvement Study; Main Street Thornhill Study; Thornhill Heritage District Plan Review; and the Highway 7 Streetscape Study). Participated and conducted studies related to infrastructure planning; such as Highway #407, Markham By-pass, Highway 7 Streetscape

Project, and Main Street Markham Streetscaping. Worked with issues of sewer and water, railway infrastructure, public transit, future airport lands, etc. Markham Heritage Estates Sub-Division: Responsible to prepare and coordinate detailed restoration plans and monitor restoration approach (coordinated lot allocation and sale; provided advice on relocation, costing, design of additions, and physical analysis of structures; and worked closely with Building department related to restoration plans). Staff support for Heritage Markham and Heritage District Study Committees in Unionville and Thornhill Village. Instigated and provided staff support for Doors Open Markham festival. Worked closely with the Building department related to permits, inspections and enforcement. Provided Expert testimony at the Ontario Municipal Board.

City of Brampton, Planning Assistant, Brampton, Ontario. Brampton Memories of a Small-Town television series. Brampton Heritage Inventory. Designation of Properties and Heritage Review. 1993 & 1994.

Town of Oakville, Planning Assistant (Heritage), Oakville, Ontario. Coordinated Municipal Heritage Planning function as fill in for a maternity leave. 1990-1993.

Awards

The Prince of Wales Prize – for municipal heritage leadership in Canada. Awarded to the Town of Grimsby 2015. Awarded to the Town of Oakville 2010. Awarded to The Town of Aurora 2008. Awarded to the Town of Markham 2000.

Lt. Governor’s Ontario Heritage Award for Community Leadership. Awarded to the Town of Grimsby 2015. Awarded to The Town of Oakville 2010. Awarded to The Town of Aurora (Recognized by Aurora Council for contribution to award) 2010.

Canadian Institute of Planners Award for Planning Excellence. “Northeast Old Aurora Heritage Conservation District Plan” (HM) 2007. “The Unionville Heritage Conservation District Plan” 2000.

B. Napier Simpson Award of Merit. Presented by the Ontario Historical Society to Heritage Markham to the outstanding municipal heritage committee in Ontario 2004.

Communities in Bloom – National and Provincial Champions. Awarded to The Town of Markham. Prepared submission package and gave presentations with respect to Heritage Conservation aspects of Markham’s overall program to judging panel 1997 & 1998.

Ontario Professional Planners Institute, Outstanding Planning Award. “The Unionville Heritage Conservation District Plan” 1999.

Ontario Heritage Foundation Community Heritage Recognition Award. Individual Award for commitment to heritage in local community (Brampton) 1999.

Heritage Markham Award. The first Doors Open Markham 2003. The Unionville Bandstand 2002.

Niagara Community Design Awards. Planning Department Assisted with nine Award winning Projects from Grimsby 2013, 2014 and 2015.

Journal Articles

A recognized writer, Michael has written numerous articles for journals and other publications:

OPPI Journal. Contributing Editor for Heritage Planning 2007 to present.

Municipal World. Regular invited contributor to the magazine 2007 to present.

Contributed articles, 1992 to present, for the following:

- Municipal World (regular feature in annual heritage issue since 2008)
- OPPI Journal
- Heritage Canada
- Community Heritage Ontario News
- Canadian Association of Professional Heritage Consultants Forum
- Ontario Historical Society News,
- The Auroran (Doors Open Aurora Series 2006 and 2007)
- Founded the Brampton Heritage Board Newsletter and Markham Heritage News
- Children’s Book “Bampy’s Wartime Coconut” presented to the RC Legion

Other Related Services

Heritage Canada Foundation / National Trust for Canada.

- Chair of the Board of Governors, 2018-present
- Ontario Representative on the Board of Governors, 2009-2012, 2015-present
- Ontario Governor, member of the Board of Governors of the Heritage Canada Foundation
- Member of Strategic Initiatives and Governance Committees
- Coordination of Team Canada Presentation

Ontario Professional Planners Institute. Editor for Heritage, Ontario Planning Journal, 2007-present.

Willowbank School of Restoration, Queenston. Faculty Associate. 2010-present.

University of Waterloo, Heritage Resources Centre. Faculty Associate. 2011-present.

Heritage Canada Foundation – Urban Planning Advisor. Urban Planning Advisor to Foundation as part of Engaging Stakeholders in Heritage and Development Initiative funded by Parks Canada. The initiative is intended to engage stakeholders (Development Community and Municipal Councils) to determine informational and procedural needs to conserve heritage resources. Presented to St. Catharine's Council with Executive Director of Heritage Canada about initiative in September 2007. Advisor to the Heritage Canada Foundation with planning for 2007 annual conference in Edmonton related to Heritage Planning. 2007-2008.

Town of Aurora, Committee of Adjustment. Chair for 2003 and 2004. 2001-2005.

Canadian Association of Heritage Professionals. Member of the Board of Directors. 2000-2002.

Brampton Historical Society. Co-Founder and Past President (1999). 1998-present.

City of Halifax, Heritage Advisory Committee. Member. 1995.

City of Brampton, Heritage Board (MHAC). Chair from 1996 to 1999. 1993-1999.

City of Brampton, Churchville Heritage District Committee. 1994-1996.

Rogers Community 10 Television – Brampton. Co-ordinator, host, writer and researcher for *Brampton: Memories of a Small Town*, a six-part television series about Brampton's History and Architecture. 1993.

Public Speaking

An accomplished speaker and excellent communicator, Michael has been invited to present at various conferences, workshops and community meetings:

- National Trust Conference (Fredericton), 2018
- OPPI Conference (Sudbury), 2018
- Ontario Heritage Conference (Sault Ste. Marie), 2018
- Hamilton/Burlington Real Estate Board, 2017
- National Trust Conference, 2016
- Ontario Heritage Conference – Niagara on the Lake, 2015
- Buffalo Niagara Heritage Awards (Kleinhans Music Hall), 2014
- Ontario Heritage Conference – Midland, 2013
- Town of Perth, 2012
- Municipality of Brockton, 2012
- Peel Heritage Conference, 2012 and 1997
- Town of Centre Wellington, 2013 and 2014
- City of Burlington – Heritage Register Public Meeting, 2010
- Willowbank School of Restoration – Heritage Planning Course, 2010 and annually from 2012-2017
- CIP/OPPI Conference, Niagara Falls, 2009
- Town of Richmond Hill, 2009
- Town of Milton, 2009
- Oakville Historical Society, 2009
- King Township, 2008
- Heritage Canada Foundation Annual Conference, 2000, 2007, 2008 and 2012 (Montreal *in French*, Quebec City, Edmonton and Toronto)
- Heritage Canada Foundation Engaging Stakeholders Initiative, 2007
- Community Heritage Ontario Workshops, 2003, 2004 and 2007

- Ministry of Culture Workshops, 2003 and 2004
- Brampton Historical Society, 1998, 2004 and 2009
- Aurora Heritage District Study Pre-consultation (prior to employment), 2003 and 2004
- Ontario Heritage Conference (Kitchener), 1998
- Town of Newmarket Heritage District, 1996
- Lectured to OMA course students about Researching Heritage Buildings, 1997
- Heritage Gardens – Markham Green Thumb Festival, 1996
- Various Council, General Committee and Planning Committee and Community meeting presentations for Brampton, Aurora and Markham.

Liam Smythe, B.URPI

Heritage Researcher

Education

B.URPI

Ryerson University (2014)

Professional Affiliations

Architectural Conservancy of Ontario

Years of Experience

With AECOM: 1

With Other Firms: 2

Training and Certifications

Certificate in Cultural and Heritage Site Management/Centennial College/2015

Summary

Liam Smythe is a Heritage Researcher in the Cultural Resource Management Department at AECOM. He completed his Bachelor of Urban and Regional Planning at Ryerson University, and a Postgraduate Certificate in Cultural and Heritage Site Management at Centennial College. Liam has previously worked as a policy and program assistant with the Ministry of Tourism Culture and Sport, assisting in the development and implementation of the *Standards and Guidelines for the Conservation of Provincial Heritage Properties*. With MTCS he helped develop a compliance survey to assess the level at which ministries and prescribed public bodies were complying with the regulations, as well as updating the heritage bridge list and identifying a series of best practices in heritage conservation at the provincial level. Working with other Ryerson University students, he conducted a comprehensive study of built heritage resources and cultural heritage landscapes in Toronto's Corktown neighborhood on behalf of the Corktown Business and Residents Association. The purpose of the study was to identify areas with the potential for designation as a Heritage Conservation District under Part V of the *Ontario Heritage Act*. He has formerly volunteered with Heritage Toronto, and completed a collections management internship with the Ontario Heritage Trust.

Liam's responsibilities at AECOM include: Conducting archival and other historic research, field reviews, photography, preparing documents and reports.

Liam is a member of the Cultural Resources Department at AECOM.

Project Experience

City of London, London BRT – Wellington Road Cultural Heritage Evaluation Reports, London, Ontario. (October 2018-January 2019). Large-scale project conducted as part of the EA process for the City of London's proposed Bus Rapid Transit system, required the completion of CHERs for six individual properties, and a group CHER for 35 properties, all located along Wellington Road in the City of London. Conducted historical research, site investigation, prepared and reviewed reports.

Hydro One, Toronto Power Transformer Station, Cultural Heritage Evaluation Report, Niagara Falls, Ontario. (October 2018). Conducted historical research for an electrical substation located south of the City of Niagara Falls, Ontario.

Hydro One, Leaside Transformer Station Cultural Heritage Evaluation Report, Toronto, Ontario. (October 2018). Conducted historical research for an electrical substation located in the Leaside neighbourhood of Toronto, Ontario.

Metrolinx, Union Station Bus Terminal Staging Facility Cultural Heritage Screening Report, Toronto, Ontario. (September 2018). Conducted site investigation and historical research for a proposed Go Transit staging facility in the Port Lands area of Toronto, Ontario.

City of Toronto, Basement Flooding Study Cultural Heritage Screening Assessment, Toronto, Ontario. (August-September 2018). Cultural Heritage Screening Assessment developed to identify built heritage resources and cultural heritage landscapes within the study area, in North York. Completed as part of the Basement Flooding Remediation and Water Quality Improvement Master Plan Class EA Studies. Tasks included research, and a field review of the study area with photo documentation.

Ainley Group, 12th Line Bridge Cultural Heritage Evaluation Report. New Tecumseth, Ontario. (July 2018) Conducted historical research, field review and documentation for a small municipally-owned bridge in the Town of New Tecumseth.

MTO, Heritage Screening Technical Memo - Rehabilitation and Replacement of Highway 9 Holland Drainage Canal Bridges. King, Ontario. (May 2018). Completed background research and site investigations in support of Heritage Screening Technical Memo as part of a Detail Design and Class Environmental Assessment (Class EA) study

Ainley Group, Humber River Bridge Cultural Evaluation Reports. Caledon, Ontario. (April 2018-June 2018). Completed Cultural Heritage Evaluation Reports for two municipally owned bridges in the former Village of Bolton, Town of Caledon. Tasks included historical research, field review, and final preparation of the document for submission to the client.

MTO, Cultural Heritage Evaluation Report, 355 Lesmill Road: Clark Locke House and William Goodwin House, Highway 401 Eastbound Collectors - Avenue Road to Warden Avenue. Toronto, Ontario. (May-June 2018). Completed site investigations and background research as part of the Detail Design and Class Environmental Assessment Study for the rehabilitation of the Highway 401 eastbound collector lanes between Avenue Road and Warden Avenue.

City of Toronto, Basement Flooding Study Cultural Heritage Screening Assessment, Toronto, Ontario. (May 2018). Cultural Heritage Screening Assessment developed to identify built heritage resources and cultural heritage landscapes within the study area, in Etobicoke. Completed as part of the Basement Flooding Remediation and Water Quality Improvement Master Plan Class EA Studies. Tasks included a research, and a field review of the study area with photo documentation.

MTO, Cultural Heritage Screening Report, Highway 401 Eastbound Collectors-Avenue Road to Warden Avenue, Toronto, Ontario. (April 2018) Completion of a Cultural Heritage Screening Report to identify built heritage resources and cultural heritage landscapes along Highway 401 between Avenue Road and Warden Avenue in Toronto. Completed as part of the Detail Design and Class EA study for the expansion of the eastbound collector lanes of Highway 401.

Biglieri Group, Heritage Impact Assessment, 45 Raynes Avenue, Bowmanville, Ontario. (April 2018). Conducted background research and site investigation for a Heritage Impact Assessment of the former Goodyear plant in Bowmanville, Ontario.

MTO, Highway 401 Neilson-Whites Road Technical Screening Memo, Toronto, Ontario. (November 2017-January 2018). Production of a Technical Heritage Screening Memo for a series of MTO-owned bridges along Highway 401 between Neilson Road in Toronto and Whites Road in Pickering. Used to determine cultural heritage value or interest prior to bridge rehabilitations. Tasks included research, field assessment and documentation.

MTO, Highway 12 Triple Bay Roundabout Cultural Heritage Evaluation Report, Midland, Ontario. (November 2017). Field assessment and photo documentation of two cultural heritage landscape. Completed for the proposed realignment of the Highway 12/Triple Bay Road intersection.

Metrolinx, Rouge River Bridge Documentation Report, Toronto, Ontario. (November 2017-May 2018). Production of a documentation report to meet the requirements of a Minister's Consent for the removal of an 1898 Truss bridge over the Rouge River on Metrolinx's Lakeshore East line. Completed extensive photo documentation of the bridge and associated landscape in March 2018 to record the condition of the site prior to its removal.

MTO, Highway 427 Expansion, Vaughan, Ontario. (December 2017-January 2018). Assisted with the architectural salvage of a property at 10220 Huntington Road in Vaughan. Worked with staff from Black Creek Pioneer Village to remove and document architectural elements including doors, railings and trim for transportation to the museum.

Appendix A

**Planning Justification Report
435, 441 and 451 Ridout Street
July 2019
Farhi Holdings Corp.
Tillman Ruth Robinson
Architects**

PLANNING JUSTIFICATION **REPORT**

OFFICIAL PLAN AMENDMENT AND
ZONING BY-LAW AMENDMENT APPLICATIONS

435, 441 and 451 Ridout Street North
City of London

Date:

July 2019

Prepared for:

Farhi Holdings Corporation

Prepared by:

MacNaughton Hermsen Britton Clarkson Planning Limited (MHBC)

630 Colborne Street, Suite 202

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1.0

INTRODUCTION

1.1 Overview

MHBC has been retained by Farhi Holdings Corporation to assist with applications to amend the City of London Official Plan (1989), the new City of London Official Plan (The London Plan) and the City of London Zoning By-law Z.-1 in support of a redevelopment proposal for lands addressed as 435, 441 and 451 Ridout Street North, London ('the Site'). The subject property is located at the northwest corner of Queens Avenue and Ridout Street North, and forms part of the City's Central London planning district and its downtown core. The intent of these applications is to permit a new mixed-use, high-rise tower on a portion of the Site currently containing the three storey addition to 451 Ridout Street. The proposed tower would accommodate residential and office/commercial uses, and would be designed to integrate with existing heritage structures on the property.

The subject lands are a single property located at the northwest corner of Queens Avenue and Ridout Street North, immediately east of the Thames River corridor and Harris Park. In total, this project site measures approximately 1.4 ha in area and contains three existing office buildings, as well as surface parking facilities. The property is designated under Part IV of the *Ontario Heritage Act*, and is also designated under Part V of the *Ontario Heritage Act* as a part of the Downtown London Heritage Conservation District. Further, the property is identified as a National Historic Site of Canada.

Tillmann Ruth Robinson Architects has prepared a design concept for the Site in support of several core project objectives. Most notably, the planned development is intended: to create a landmark, mixed-use development for London; to redevelop and intensify the property in a manner that is sensitive to existing heritage buildings; and to align with the applicable planning policy framework and related planning initiatives (as discussed in this Report).

In summary, the redevelopment concept incorporates a 40 storey, mixed-use tower to replace the three storey office building addition located to the rear (west) of the historic structure addressed as 451 Ridout Street. The proposed tower, which would be connected to 451 Ridout Street, would contain approximately 6,308 m² of office/commercial space on lower floors and a total of 280 residential suites on the upper floors. No modifications are proposed to the heritage buildings addressed 435 and 441 Ridout Street North.

The planning merits of this proposal are evaluated in detail within this Report and are summarized below:

- The project supports the intensification of lands in the City's downtown that are designated in the City's 1989 Official Plan and The London Plan for high density residential, office, and commercial uses;
- The property is well suited for this development proposal considering its physical size/shape, its location within a mixed-use development area and its proximity to existing offices, retail/service commercial enterprises, government activities, recreational, entertainment and cultural facilities, public transit services and the proposed bus rapid transit (BRT) system. Residents and employees of this new development would therefore have access to, and would support, a range of local businesses, public institutions and transit services;
- Design elements integrated into the proposal promote an attractive and prominent building form that would contribute positively to both the local streetscape and the City's downtown skyline. Additionally, the high-rise building design would create a landmark for the Forks of the Thames activity area and, more broadly, Downtown London;
- Introduces greater housing choice within the downtown core to help broaden the range and mix of housing available to current and future residents of Central London. In effect, this project would help the City accommodate forecasted housing demands and achieve intensification targets; and
- Integrates a mix of higher density residential and complementary office/commercial uses which, collectively, would support efforts to revitalize the downtown core and encourage its continued development as a multi-functional regional centre. The proposal would also help to promote neighbourhood stability in the downtown core by diversifying the mix of housing available in this area (to better meet the changing needs of local residents over the long-term).

In light of these considerations, in our opinion this proposal is appropriate for the subject lands and the downtown development context, and should not generate significant land use conflicts with adjacent properties.

1.2 Report Framework

This Planning Justification Report has been prepared for submission to the City of London in support of the aforementioned Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) applications. The Report includes the following primary components:

- An introduction and general description of the subject lands, surrounding uses and existing conditions to provide an understanding of the locational context;
- A summary of the concept plan prepared for the Site, including an overview of the core design elements associated with the development proposal;
- A review of the planning permissions applicable to the property; and
- An assessment of the proposal relative to: (1) the policy framework of the Provincial Policy Statement, the 1989 Official Plan and The London Plan; and (2) the development regulations of the City's Zoning By-law.

As part of this planning analysis, the following documents were reviewed:

- Provincial Policy Statement;
- City of London Official Plan (1989);
- City of London Official Plan (The London Plan);
- City of London Zoning By-law Z.-1;
- Our Move Forward (London's Downtown Plan);
- Downtown Heritage Conservation District Plan; and
- Downtown London Community Improvement Project.

1.3 Planning Applications

Our analysis has confirmed that the following applications are required to permit the proposed redevelopment and intensification project:

Table 1.0 – Required Planning Applications

Planning Application	Approval Authority
Official Plan Amendment to add a Specific Policy area to the 1989 Official Plan and new Official Plan supporting the proposal.	City of London
Zoning By-law Amendment to amend the Downtown Area Zone applying to the Site to facilitate the redevelopment proposal.	City of London
Site Plan Approval (future application)	City of London

A 'Pre-Application Consultation' meeting was held on June 13, 2017 to review the submission requirements for the development concept. As set out in the associated 'Record of Pre-Application Consultation', the following reports have been prepared in support of the proposal and are enclosed with the OPA and ZBA applications:

- Planning Justification Report, with urban design considerations;
- Heritage Impact Statement;
- Environmental Impact Statement (Preliminary);
- Geotechnical Engineering Review (Draft);
- Sanitary Servicing Feasibility Study;
- Stage 1-2 Archaeological Assessment; and
- Transportation Impact Assessment.

Following further discussion with City staff on December 19, 2018, it was agreed that urban design considerations would be included with the Planning Justification Report rather than in a separate Urban Design Brief. It was also agreed that more detailed design materials would be prepared in conjunction with the Site Plan Approval process for consideration by City staff and the City's Urban Design Peer Review Panel.

2.0

SITE LOCATION AND SURROUNDING LAND USES

2.1 Site Description

The subject lands are a single property located at the northwest corner of Queens Avenue and Ridout Street North. These lands are addressed as 435, 441 and 451 Ridout Street North; reflecting the street addresses of the three buildings located on the premises. As discussed, the Site forms part of the Central London planning district and the City's downtown core.

Figure 1 illustrates the general location of the Site.

The lands, which are generally rectangular in shape, measure approximately 1.4 ha in area and include approximately 73 m of frontage along Ridout Street North and approximately 103 m of flankage on Queens Avenue. Three buildings are currently contained on the Site: a two storey office building (435 Ridout Street North), a three storey office building (441 Ridout Street North), and a split level, three storey office building (451 Ridout Street North). These buildings are listed under Part IV of the Ontario Heritage Act, and collectively encompass a National Historic Site.

The subject lands are currently accessed via three right-in, right-out entrances; two accessed from Ridout Street North and one accessed from Queens Avenue. Off-street parking is provided in surface fields adjacent to the Ridout Street North and Queens Avenue corridors, and at an internal (rear) parking area immediately west of 451 Ridout Street North. An area of manicured lawn is also located adjacent to the rear parking lot which interfaces with the Thames Valley Parkway and Harris Park. Vehicular access to the internal parking area is provided by way of a private driveway connecting to the Harris Park entrance (located at the western terminus of Dufferin Avenue). A series of walkways and stairs provide pedestrian access to this parking area and the broader property.

Existing building entrances are positioned at generally the same elevation as the Ridout Street North and Queens Avenue corridors. Internal to the Site, the lands slope to a lower elevation

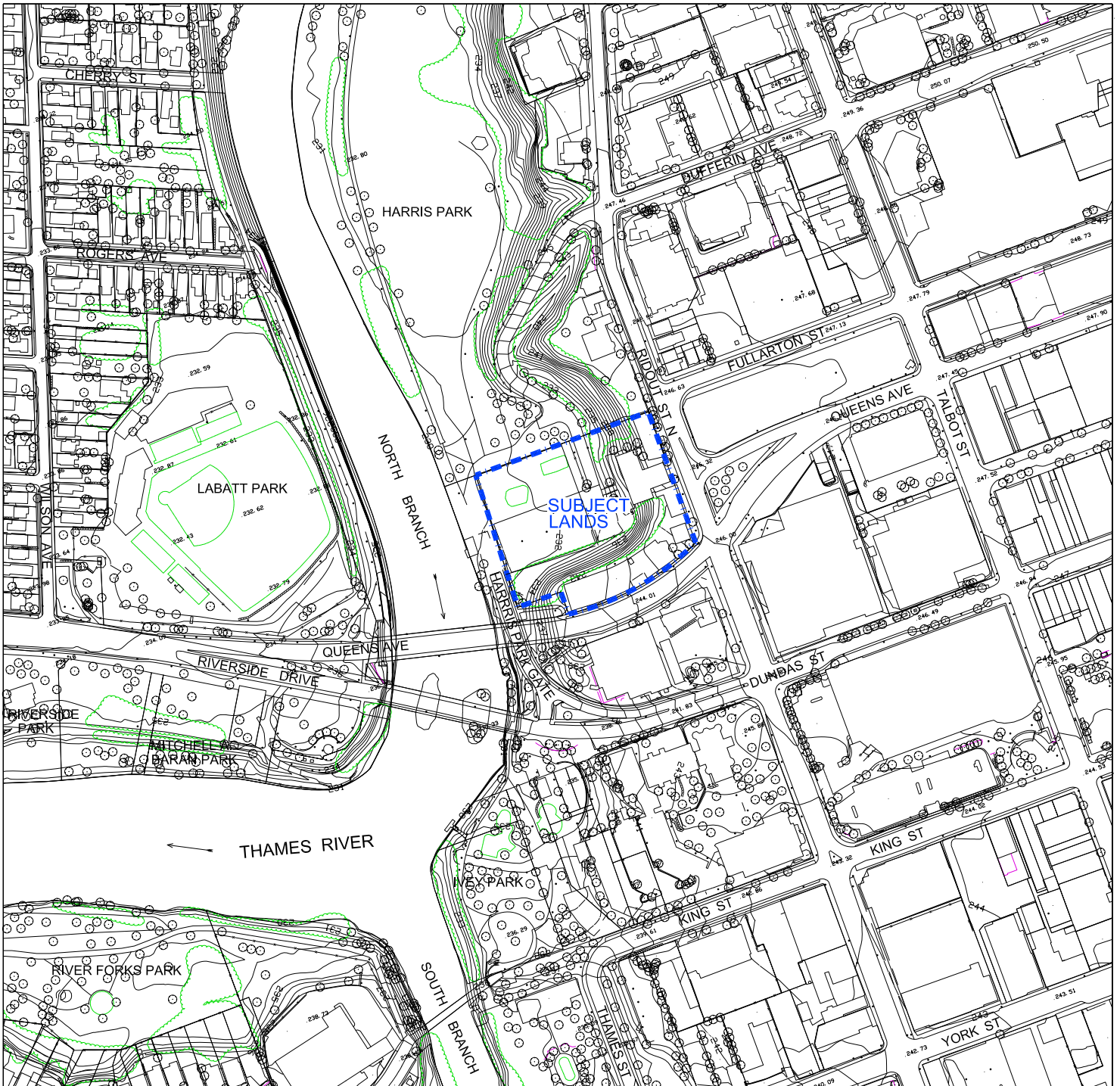
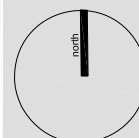


Figure 1
Context Map



and towards the Thames River. The rear elevations of the Site generally match the Harris Park and Thames Valley Parkway, which abut the western property boundary.

Generally, the northwestern portion of the Site is identified as being within the floodplain regulated by the Upper Thames River Conservation Authority (UTRCA).

2.2 Surrounding Land Uses

The subject lands form part of the 'Central London' planning area which encompasses the City's downtown core and is comprised of a diverse mix of intensive land uses (e.g., offices, retail/service commercial enterprises, government activities, recreational, entertainment and cultural facilities). The Site is also located in proximity to a variety of these downtown land uses including major civic attractions, such as Covent Garden Market, Budweiser Gardens, the Grand Theatre, Victoria Park, Museum London, the Forks of the Thames Interpretative Centre, Harris Park and the Thames Valley Parkway.

Adjacent to the eastern perimeter of the Site, Ridout Street North integrates two lanes of traffic in a southerly direction with a sidewalk on the western side of the street. This section of Ridout Street North also incorporates a 'split' which provides access to Queens Avenue in an easterly direction. Adjacent to the Site's southern perimeter, Queens Avenue accommodates two lanes of traffic in a westerly direction, with sidewalks provided on both sides of the corridor. Schedule 'C' (Transportation Corridors) of the 1989 Official Plan classifies Queens Avenue as an 'Arterial' road. According to the transportation network classification prescribed in Section 18.2.2 of this Official Plan, arterial roads are designed to serve high volumes of intra-urban traffic with controlled or limited property access. Ridout Street North is classified as a 'Primary Collector'. According to Section 18.2.2, primary collectors serve light to moderate volumes of inter-neighbourhood traffic at moderate speeds and have limited property access.

The Site is also located within convenient walking distance of London Transit Commission (LTC) bus stops in service along Queens Avenue and Ridout Street North. Additionally, in May 2016, City Council endorsed a BRT system that includes proposed routing along the Queens Avenue corridor adjacent to the property. Further, on March 26, 2019, City Council endorsed a funding application supporting the 'Downtown Loop' route of the BRT system. This route is to include a new transit stop on Queens Avenue in the vicinity of the Talbot Street intersection.

Table 2.0 identifies that there is a diverse mix of cultural, institutional and residential uses in the immediate vicinity of the subject lands.

Table 2.0 – Surrounding Land Uses

Relative Location	Existing Land Uses
TO THE NORTH:	Harris Park, including entrance driveway; Eldon House and Gardens; The Harrison high-rise apartment (500 Ridout Street North)
TO THE EAST:	Ridout Street North corridor; offices in converted single detached dwellings; Surface parking lot; Ontario Court of Justice/Richard Pierpoint Building; Budweiser Gardens
TO THE SOUTH:	Queens Avenue; Museum London; Dundas Street; First Hussars Museum; Old Courthouse Building
TO THE WEST:	Harris Park Gate; The Thames Valley Parkway; The Thames River; Labatt Park

Figure 2 illustrates the Site, surrounding lands and the local development setting.

Figure 2: Perspective of Site: View North from Forks of the Thames Activity Area



Source: Google Maps: February 4, 2019

2.3 Spatial Analyses

2.3.1 Regional Spatial Analysis

A Regional Analysis was conducted around the Site at a 400 and 800 metre radius as illustrated on **Figure 3**.

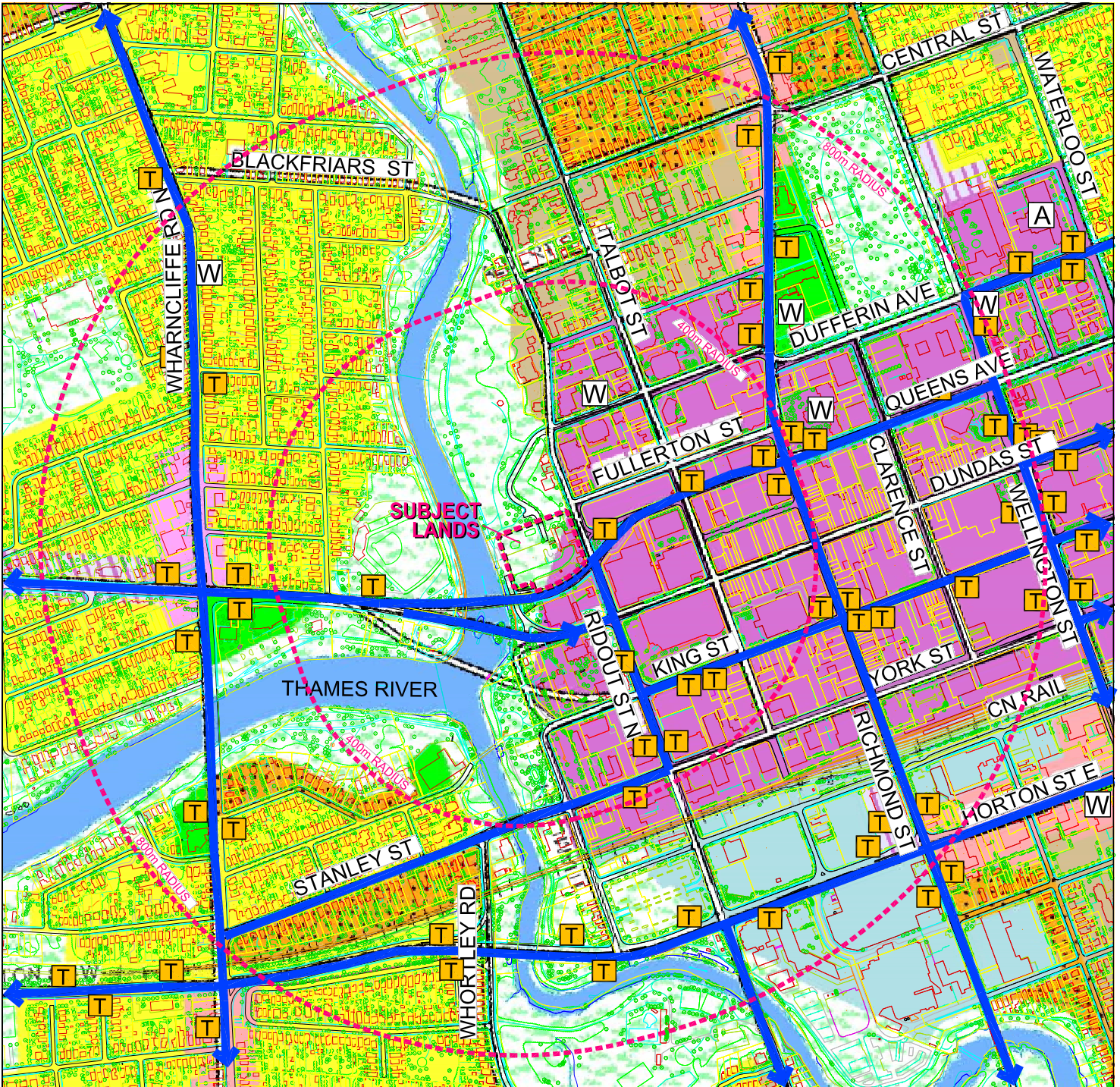
The 400 metre radius incorporates a large portion of the City's downtown core and includes a diverse range of land uses (e.g., offices, retail/service commercial enterprises, government activities, recreational, entertainment and cultural facilities, high density residential uses). Additionally, light industrial uses are situated within this radius south of the railway corridor and, as discussed, major open space (Thames Valley Parkway, Harris Park) is situated immediately east of the Site. Major transit routes along Richmond Street, Dundas Street, King Street also fall within this radius, including the Downtown Loop of the planned BRT system.

A broader range of land uses are evident within the 800 metre radius including additional downtown development, light industrial areas, schools, parkland and residential neighbourhoods containing low and medium density residential forms. The number of accessible transit routes is also increased within this larger radius.

2.3.2 Local Analysis

A Local Analysis was conducted to understand the Site's relationship with the surrounding uses in the immediate area. The key findings of the analysis are as summarized below and illustrated on **Figure 4**:

- An active frontage zone has been identified along the Queens Avenue and King Street frontages. Appropriate pedestrian walkways, extensive glazing, enhanced façade treatments and weather protection will be provided in the vicinity of these frontages to enhance and activate the streetscape;
- A zone of sensitivity has been identified where the subject lands directly abut other lands designated for residential purposes and parkland. Section 3.3 of this Report provides details respecting the design response along this interface; and
- The Site is well served by transit and is within convenient walking distance of several LTC transit routes operating along Ridout Street North, Queens Avenue, Dundas Street and Richmond Street. The site is also located within convenient walking distance of the City's planned BRT route, which is to extend along the Dundas and Richmond Street corridors in the downtown core.



LEGEND

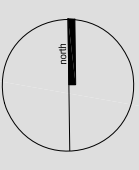
- MULTI FAMILY - HIGH DENSITY RESIDENTIAL
- MULTI FAMILY - MEDIUM DENSITY RESIDENTIAL
- LOW DENSITY RESIDENTIAL
- MAIN STREET COMMERCIAL NODE
- NEIGHBOURHOOD COMMERCIAL NODE
- DOWNTOWN AREA
- OFFICE AREA
- COMMUNITY FACILITY
- OPEN SPACE
- LIGHT INDUSTRIAL

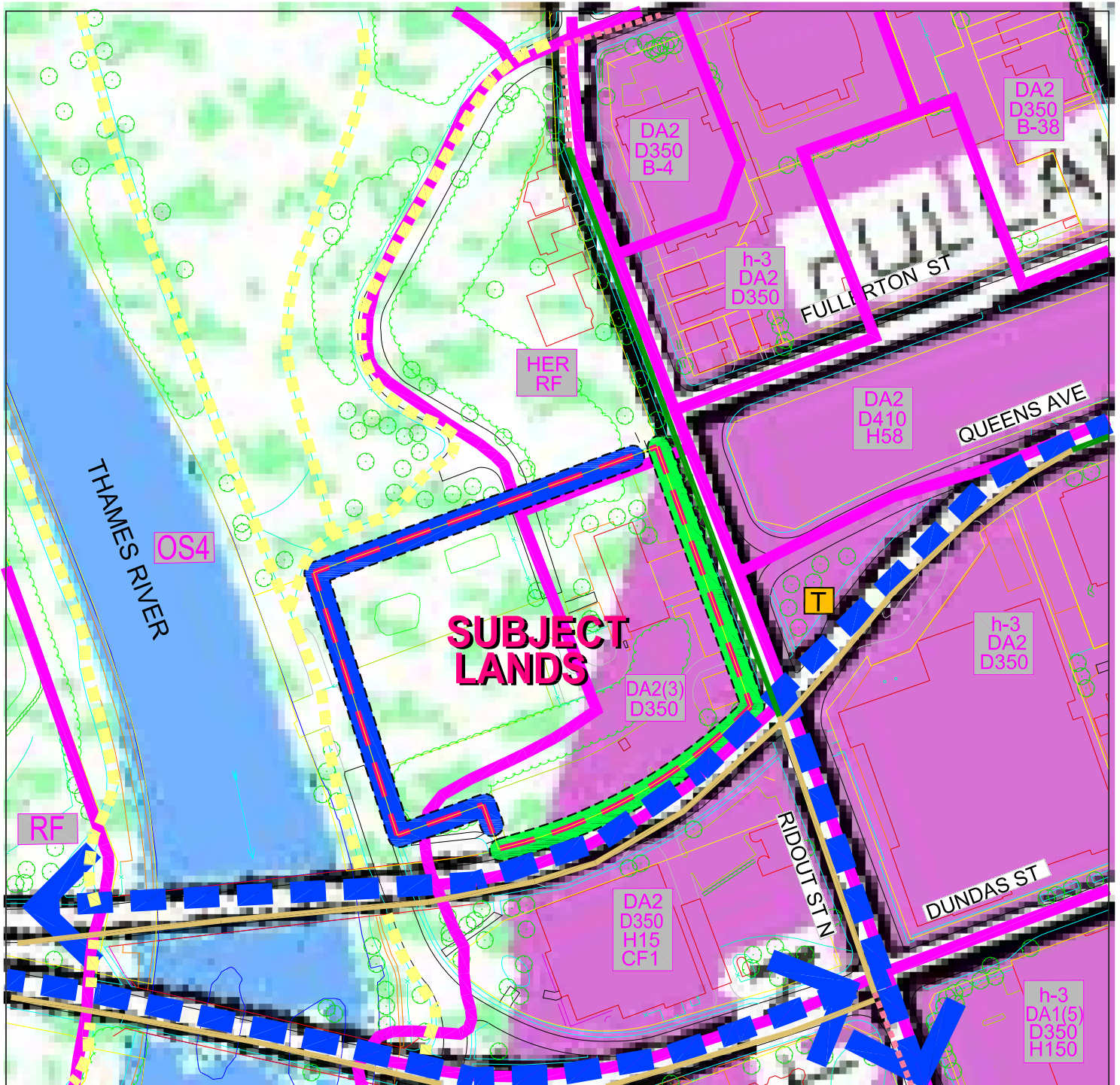
- A PUBLIC ELEMENTARY SCHOOL
- W PLACE OF WORSHIP
- TRANSIT ROUTE
- T TRANSIT STOP

Figure 3
Regional Spatial Analysis
400-800m
 SUBJECT LANDS

PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE
MHBC PLANNING
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 P: 519 858 2797 F: 519 858 2920
 WWW.MHBCPLAN.COM

DATE: July 15, 2019 **SCALE:** 1 : 10,000
 P:\18159\A\Graphics\ Figure 3 -Regional Spatial Analysis - 400-800m- July 152019





LEGEND

- DOWNTOWN AREA
- OPEN SPACE

ZONING LEGEND

- ZONE LIMIT
- h HOLDING PROVISION
- B BONUSING PROVISION
- H HEIGHT PROVISION
- D DENSITY PROVISION
- HER HERITAGE ZONE
- DA DOWNTOWN AREAS ZONE
- RF REGIONAL FACILITY ZONE
- CF COMMUNITY FACILITY ZONE
- OS OPEN SPACE ZONE

- ACTIVE FRONTAGE ZONE
- ZONE OF SENSITIVITY
- TRANSIT ROUTE
- TRANSIT STOP

- SIGNED BIKE LANE
- BIKE LANE
- SHARROW
- THAMES VALLEY PARKWAY

Figure 4
Local
Spatial Analysis
Site Specific

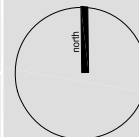
SUBJECT LANDS


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DATE: July 15, 2019

SCALE 1 : 2,000



3.0

DESCRIPTION OF THE PROPOSAL

3.1 Design Goals and Objectives

Farhi Holdings Corporation is proposing to amend the City's new Official Plan and Zoning By-law to support the development of a prominent, mixed-use, high-rise tower on these lands. The proposed tower form would be integrated into the existing heritage structure addressed as 451 Ridout Street North. The rear portion of this building, which currently encompasses the three-storey addition to the building, would be removed and replaced with the new high-rise structure and underground parking facilities.

The following design objectives have been identified to help achieve the project goal:

1. Integrate a mix of higher density residential units and complementary office/commercial uses to collectively support downtown revitalization;
2. Design a high-rise tower design that will create a strong visual presence to further define the western gateway into the City's downtown core and to help frame the Thames Valley Parkway and Harris Park;
3. Create a positive addition to the Queens Avenue and Ridout Street North corridors, by: enhancing the visual qualities of the streetscape, providing an engaging pedestrian environment, having regard for local heritage considerations and contributing to the larger downtown context;
4. Redevelop the Site in a manner that will be supportive of transit and alternative transportation modes, and will allow residents to walk to nearby commercial, office, entertainment, and public amenities;
5. Incorporate enhanced indoor and outdoor amenity space for residents, and improve pedestrian connectivity to local streets, adjacent parkland and nearby pathway systems;

6. Develop a vehicular ingress/egress arrangement that minimizes local traffic disruptions; and
7. Apply the design direction set out in the City's Official Plans and applicable guideline documents, where practical and appropriate.

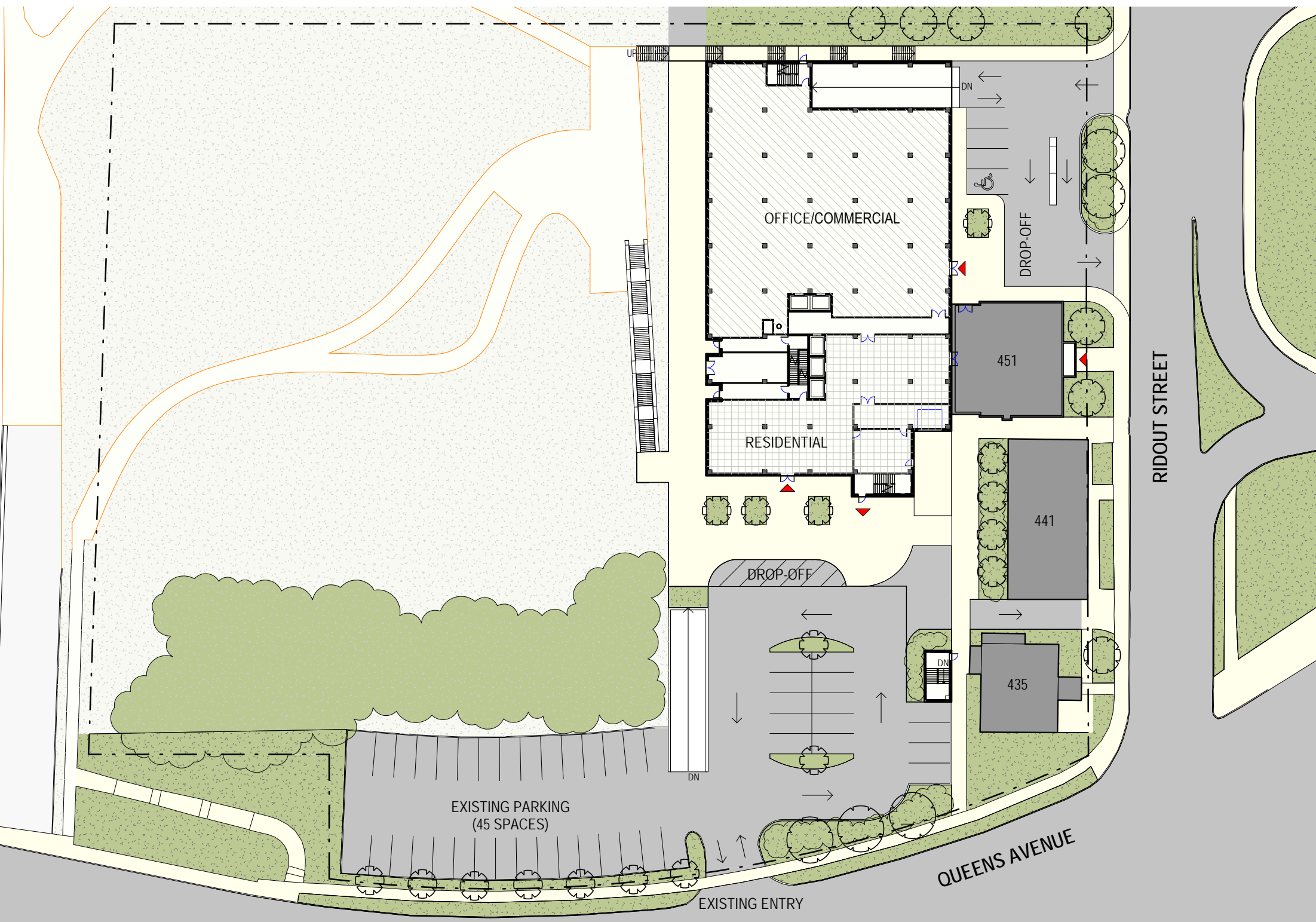
3.2 Concept Plan


Tillmann Ruth Robinson Architects have prepared a preliminary building design and site redevelopment plan that is intended to achieve the aforementioned design goals and objectives. A conceptual site plan (concept plan), architectural renderings, conceptual building elevations and contextual section drawings have been prepared to illustrate the layout, scale and character of the proposed development (refer to **Figure 5, Appendix 'A'** and **Appendix 'B'** respectively). **Appendix 'C'** includes the conceptual landscape plan designed by Ron Koudys Landscape Architects (RKLA) for this development. The RKLA plan generally illustrates the pathways, amenity areas and landscaping features intended for this development site. Additionally, **Appendix 'D'** provides a shadow assessment of this redevelopment plan.

The key components of the project are as follows:

- A 40 storey tower incorporating an enhanced level of architectural design and containing 6,308 m² of office/commercial space within the first four levels and a maximum of 280 apartment units within levels five (5) to 40. The tower base, which would include the office/commercial space, main lobby space, storage areas and administrative offices, would have a total building area of approximately 1,670 m². The main tower component would incorporate a slender floorplate (approximately 860 m² in area) and would contain a range of suite configurations;
- A variety of indoor amenities within the tower, including a lounge area, fitness facility, party room and outdoor patio space on the fifth floor;
- Outdoor amenity space interspersed throughout the property and visible from the public realm, including landscaped forecourts adjacent to the entrances and vehicle drop-off areas;
- A multi-level parking area integrating four storeys of underground parking and at-grade parking areas, as well as a loading area, bicycle storage and waste/recycling storage. A total of 372 vehicle stalls would be accommodated in this arrangement, with parking (315 stalls) predominately accommodated underground. It is envisioned that at-grade stalls would primarily function as visitor parking;
- Right-in, right-out entrances under existing street configurations providing street access to Queens Avenue (one entrance) and Ridout Street North (two entrances). A right-in entrance from Ridout Street North is also proposed at the northern limit of the Site;
- Access driveways to the four storey parking garage provided at-grade from Queens Avenue and Ridout Street North. Additionally, delivery vehicles would access the

FARHI HOLDINGS - 451 RIDOUT STREET



 **OFFICE/COMMERCIAL**
 **RESIDENTIAL**

ZONE :		
SITE USAGE:		
SITE DATA	REQUIRED	PROVIDED
SITE AREA		14,008 m ² (150,780 SF)
BUILDING AREA (NEW)		1,670 m ² (17,975 SF)
BUILDING AREA (EXISTING)		601.67 m ² (6,476.29 SF)
TOTAL BUILDING AREA		37,587 m ² (404,583 SF)
TOTAL PARKING AREA (GARAGE)		12,500 m ² (134,548 SF)
BUILDING HEIGHT		123.9 m (406'-6")
LANDSCAPE AREA		7,193 m ² (77,425 SF)
LANDSCAPE OPEN SPACE		51.3%
HARDSURFACE AREA		
PAVED AREA		2,400 m ² (25,833 SF)
SIDEWALK AREA		1,845 m ² (19,859 SF)
TOTAL		4,245 m ² (4569 SF)
LOT COVERAGE MAXIMUM		17.2%
LOT FRONTAGE		97.1 m
LOT DEPTH		132.6 m
FRONT YARD SETBACK		17.89 m
REAR YARD SETBACK		75.26 m
INTERIOR SIDE YARD SETBACK		43.43 m
INTERIOR SIDE YARD SETBACK		4.93 m
BICYCLE PARKING		TO BE DETERMINED

NUMBER OF SUITES	
TOTAL SUITES	280

PARKING STATISTICS					
LEVEL	AREA	NUMBER OF PARKING SPACES (IN GARAGE)	NUMBER OF BF PARKING SPACES (IN GARAGE)	NUMBER OF PARKING SPACES (AT GRADE)	TOTAL PARKING
G	2,265 m ²	N/A	N/A	49	49
P1	3,125 m ²	78	2	N/A	80
P2	3,125 m ²	89	1	N/A	90
P3	3,125 m ²	92	1	N/A	93
P4	3,125 m ²	59	1	N/A	60
TOTALS	14,765 m ²	315	5	49	372

SITE / FLOOR PLAN AT STREET LEVEL (49 SURFACE PARKING SPACES)

underground parking facility via the existing private driveway connecting to the Harris Park entrance; and

- Pedestrian connections to improve access to the street frontages, the Thames Valley Parkway and Harris Park in order to support greater active transportation linkages between the Downtown and the Thames River corridor.

3.3 Design Considerations

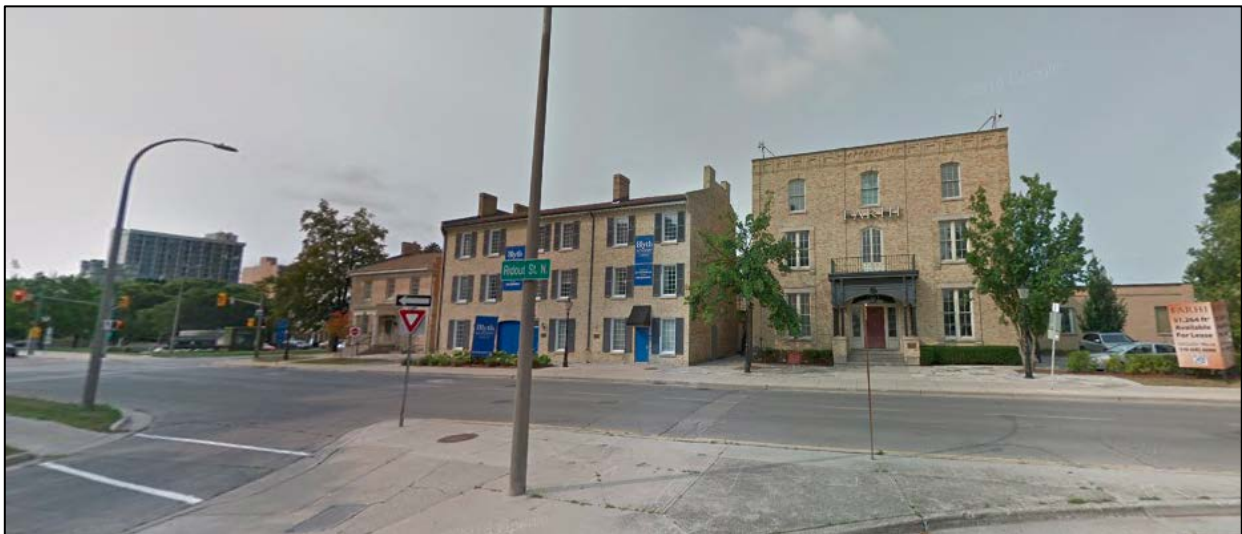
The following discussion outlines several design elements integrated into the proposed redevelopment plan. Additional design details are presented under Section 4.2.6 of this Report.

- **Building Form and Orientation.** The proposed mixed-use, high rise building would be positioned at the rear of the heritage structure at 451 Ridout Street North, generally at the location of the existing building addition. The tower component of the new building is positioned immediately west of this heritage structure, with the four-storey office/commercial element extending north from the tower base.

The proposed building arrangement is intended to preserve the unobstructed view of 435, 441 and 451 Ridout Street North from the street frontage and to promote a landmark vista at the western terminus of Queen Street.

Figure 6 illustrates the existing streetscape at the Site from the east elevation; **Figure 7** provides a conceptual rendering of this elevation from a similar location.

Figure 6: Ridout Street North streetscape: View west from Queens Avenue



Source: Google Maps: February 4, 2019

FARHI HOLDINGS - 451 RIDOUT STREET



RIDOUT STREET PODIUM ENTRANCE

By positioning the tower to the rear of these buildings, the design layout also enhances the prominence of the structure from the Thames River corridor (particularly from the Forks of the Thames activity area). Moreover, the tower location would help to frame Harris Park and the Thames Valley Parkway, while also providing increased surveillance into this area (contributing to a safer pedestrian environment).

Figure 8 illustrates the existing building arrangement from the entrance to Harris Park (west elevation); **Figure 9** provides a conceptual rendering of this elevation from a similar location.

Figure 8: West elevation of Site: View east from Thames Valley Parkway



Source: Google Maps: February 4, 2019

In summary, the building positioning is intended to complement, and be sympathetic to, the character of these heritage buildings and the broader Downtown London setting. In this respect, the form and orientation of the tower would establish an iconic gateway feature, while also helping to accentuate the overall character and vitality of Downtown London.

- **Building Massing.** The massing of the proposed point tower is designed to create a comfortable and engaging pedestrian environment that is compatible with, and sensitive to, the adjacent streetscapes, the local development context and the broader downtown setting. Further, the building integrates three principal elements above-grade:
 1. **'Base' Element.** The 'base' component of the proposed tower generally encompasses the main building entrance, building lobby and office/commercial space. In total, the tower base integrates the first four floors of the development and is designed to both

FARHI HOLDINGS - 451 RIDOUT STREET



WEST FACADE PARK VIEW

integrate with 451 Ridout Street North and complement nearby heritage buildings. The positioning of the base component also maintains the continuity of the existing street edge along Ridout Street North and helps to frame the development interface with Harris Park.

2. **'Middle' Element.** Residential units are massed in a defined 'middle' feature situated above the office/commercial space and deck parking and extending from the fifth to 29th floors. The middle element includes the core apartment component of the project, as well as amenity space provided on the fifth floor. Apartment suites incorporate individual balconies oriented towards Ridout Street North, Queens Avenue and Harris Park. These protruding balconies provide shadowing into and across the building surface. Further, distinctive patterned design elements extend the length of the middle feature along the front portions of the east and west façades. Collectively, the components of the middle element serve to soften the massing of the building while also accentuating its relationship with the adjacent streetscapes and the Thames Valley corridor.
3. **'Top' Element.** The top of the building incorporates the 30th to 40th floors and has been designed to be distinctive and to positively contribute to the downtown skyline. This tower component is intended to house residential suites having individual balconies consistent in purpose as those planned for the middle element. The rooftop element would integrate a penthouse suite, a large terrace and mechanical equipment.

- **Façade Treatment.** The tower design incorporates a consistent, contemporary façade style integrating extensive glazing and repetition of lines and windows through horizontal articulations (to help break up the continuous mass of the structure). Most notably, curved elements are integrated the base, middle and top façades to acknowledge and reflect the Thames River corridor interfacing with, and inspiring this design. Interruptions (cut-outs) in the balcony design are also proposed to provide unique design components within the tower to further break up the building mass. Moreover, large windows and entrance features in the lower floors would help to promote more active street frontages along Ridout Street North and Queens Avenue, and to further animate the west elevation (viewed from the Thames River corridor). Appendices 'A' and 'B' present several renderings of the proposed development which illustrate the aforementioned design treatments.
- **Pedestrian Environment/Outdoor Amenity Space.** The office/commercial and residential elements of the proposed tower are to be accessed by a common (main) pedestrian entrance from the Ridout Street North sidewalk to the building lobby. The walkway extends along the north face of 451 Ridout Street North. A secondary building access is also provided along the south building elevation to provide connectivity from the surface parking lot and the Queens Avenue sidewalk. Internal walkways would also provide linkages to surface parking areas, the Thames Valley Parkway and Harris Park.

The building lobby is also accessible from the parking garage. Additionally, as illustrated in Appendix 'C', the landscaping concept for the development provides outdoor amenity space for residents, employees, and customers, as well as the general public.

3.4 Heritage Considerations

The three existing buildings on the Site (435, 441 and 451 Ridout Street North) are listed on the City of London's Inventory of Heritage Resources (Register) as 'Priority 1' structures. Section 4.0 of the Register sets out that Priority I buildings are considered to be London's most important heritage structures and merit designation under Part IV of the *Ontario Heritage Act*. In this respect, the subject property is designated under Part IV of the Act. The property is also designated under Part V of the Act as a part of the Downtown London Heritage Conservation District, and is identified as a National Historic Site of Canada (referred to as the 'Ridout Street Complex'). Further, the Site is adjacent to other listed heritage properties, including the Eldon House (481 Ridout Street North) and the Middlesex Courthouse and Gaol (399 Ridout Street North).

AECOM Canada Inc. (AECOM) has conducted a Heritage Impact Assessment (HIA) in conjunction with this proposal to evaluate the potential heritage impacts of the proposed redevelopment plan. It is generally concluded in Section 7 of the HIA that, to mitigate the potential direct and indirect impacts to identified cultural heritage value, mitigation strategies described in the report should be considered in conjunction with project refinements.

4.0

PLANNING ANALYSIS

The Official Plan and Zoning By-Law Amendment applications defined in Table 1.0 of this Report must be assessed in terms of applicable policies set out by the Province of Ontario and the City of London. The following section outlines how the proposal addresses relevant policies from the Provincial Policy Statement, the City of London Official Plan (1989) and the new City of London Official Plan (The London Plan).

4.1 Provincial Policy Statement

The Provincial Policy Statement (PPS) sets the policy foundation for regulating the development and use of land in Ontario. The 2014 PPS was issued under the authority of Section 3 of the Planning Act and came into effect on April 30, 2014.

Section 3(5) of the Planning Act requires that all decisions affecting planning matters 'shall be consistent with' policy statements issued under the Act. Table 3.0 demonstrates how the proposed Official Plan and Zoning By-law Amendments are consistent with Policies of the 2014 PPS that, in our opinion, have particular relevance to this proposal.

Table 3.0 – Consistency with Provincial Policies

PPS Policy	Response
1.1.1 Healthy, livable and safe communities are sustained by: a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long-term; b) accommodating an appropriate range and mix of residential (including second units, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including	This development proposal promotes an efficient land use pattern that would support the long-term financial well-being of the Province of Ontario and the City of London (in the form of increased property tax assessment and the optimization of existing infrastructure). Further, the residential population, employees and patrons of this development would help to support the overall viability of the City's commercial core. Economic benefits would also be derived from construction of the high-rise tower.

PPS Policy	Response
<p>places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;</p> <p>c) avoiding development and land use patterns which may cause environmental or public health and safety concerns;</p> <p>e) promoting cost-effective development patterns and standards to minimize land consumption and servicing costs;</p> <p>g) ensuring that necessary infrastructure, electricity generation facilities and transmission and distribution systems, and public service facilities are or will be available to meet current and projected needs.</p>	<p>The Site is located within the Central London planning area, which functions as the City's primary business, office, cultural and administrative centre. Development of a mix-use, high-rise on the Site aligns with City objectives to encourage a broader range of residential and employment opportunities in the Downtown London. Further, the core area contains a diverse mix of intensive uses, including office towers and apartment buildings. This development proposal is designed to be compatible with these intensive land uses and appropriate for the existing development context.</p> <p>The proposed development should not result in environmental or public health and safety concerns.</p> <p>Preliminary servicing reviews have been completed to confirm that (1) the development can proceed in a cost-effective manner and (2) the necessary servicing infrastructure would be available to meet projected needs. It is anticipated that existing public service facilities provided in Central London would accommodate the demands of this development.</p>
<p>1.1.2 Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of up to 20 years. However, where an alternative time period has been established for specific areas of the Province as a result of a provincial planning exercise or a provincial plan, that time frame may be used for municipalities within the area.</p> <p>Within settlement areas, sufficient land shall be made available through</p>	<p>The development of the Site represents an intensification of lands within the City's downtown core that are intended for a wide variety of land uses (including high-rise building forms). This proposal would accommodate a mix of high density residential and office/commercial uses which, collectively, would support efforts to revitalize the downtown core and encourage its continued development as a multi-functional regional centre. Moreover, implementation of this proposal would help the City accommodate forecasted housing</p>

PPS Policy	Response
intensification and redevelopment and, if necessary, designated growth areas.	needs and meet residential intensification targets.
1.1.3.1 Settlement areas shall be the focus of growth and development, and their vitality and regeneration shall be promoted.	The subject lands are situated within the City's Urban Growth Boundary and are therefore considered part of a settlement area, as defined by the PPS. Additionally, this proposal supports the growth and development objectives prescribed for the downtown core as set out in the City's Official Plans (discussed in the following sections of this Report).
<p>1.1.3.2 Land use patterns within settlement areas shall be based on:</p> <p>a) densities and a mix of land uses which:</p> <ol style="list-style-type: none"> 1. efficiently use land and resources; 2. are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and / or uneconomical expansion; 3. minimize negative impacts to air quality and climate change, and promote energy efficiency; 4. support active transportation; 5. are transit-supportive, where transit is planned, exists, or may be developed; 	<p>This development proposal would help to promote efficient use of land and services in Downtown London. Preliminary servicing reviews have also been carried out to confirm that adequate servicing capacity is available to accommodate the intended development, including a preliminary sanitary servicing feasibility study completed by Strik Baldinelli Moniz (SBM).</p> <p>Where practical and appropriate, the project would incorporate sustainable development principles to help minimize environmental impacts.</p> <p>The site layout promotes active transportation through the provision of (1) pedestrian connections to Queens Avenue and Ridout Street North and (2) bicycle storage. Moreover, the project site is located adjacent to public trails associated with the Thames Valley Parkway.</p> <p>The subject lands are located within convenient walking distance of existing LTC bus stops serving the downtown core and providing direct transit connectivity to employment areas, major public institutions and shopping centres.</p>
1.4.3 Planning authorities shall provide for an appropriate range and mix of	Development of a high-rise apartment on the subject lands would help broaden the

PPS Policy	Response
<p>housing types and densities to meet projected requirements of current and future residents of the regional market area by:</p> <ul style="list-style-type: none"> c) directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs; d) promoting densities for new housing which efficiently use land, resources, infrastructure, and public services facilities, and support the use of active transportation and transit in areas where it exists or is to be developed; 	<p>range and mix of housing available to current and future residents of Central London. Additionally, this intensification project would help the City accommodate forecasted housing needs, achieve intensification targets and support downtown revitalization initiatives.</p> <p>Preliminary servicing reviews have been conducted to confirm that servicing infrastructure is available to meet projected needs. Additionally, it is anticipated that existing public service facilities available in the downtown core would accommodate the projected demands of this development.</p> <p>The planned development would (1) utilize existing land and servicing resources in an efficient manner and (2) would be supported by the road transportation system, the active transportation network and transit services (existing and planned).</p>
<p>1.5.1 Healthy, active communities should be promoted by:</p> <ul style="list-style-type: none"> a) Planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate active transportation and community connectivity; 	<p>The proposal incorporates two key elements to help support healthy, active communities. Firstly, active transportation and social interaction would be encouraged by (1) the provision of walkway connections to municipal sidewalks, outdoor amenity areas for passive recreation, and bicycle storage in the parking facility, as well as (2) proximity to Harris Park and the Thames Valley Parkway. Secondly, to promote community connectivity, this project integrates residential development and employment activities in proximity to existing neighbourhoods, business, office, cultural and administrative activities, parks, public transit and pathway systems.</p>
<p>1.6.1 Infrastructure, electricity generation facilities and transmission and distribution systems, and public service facilities shall be provided in a</p>	<p>Preliminary servicing reviews have been carried out to confirm that the development can proceed in a cost-effective manner, and to ensure that the necessary infrastructure is</p>

PPS Policy	Response
<p>coordinated, efficient and cost effective manner that considers impacts from climate change while accommodating projected needs.</p>	<p>available to meet projected needs. As discussed, it is anticipated that the development can be accommodated by existing public service facilities.</p>
<p>1.6.7.1 Transportation systems should be provided which are safe, energy efficient, facilitate the movement of people and goods, and are appropriate to address projected needs.</p>	<p>Paradigm Transportation Solutions (Paradigm) completed a Transportation Impact Assessment (TIA) for a preliminary site redevelopment plan, as well as subsequent review of this proposal. Through these evaluations, Paradigm concludes that the existing road network can accommodate the proposed development provided the recommended remedial measures are implemented. The implications the future BRT system on the local road network were also evaluated as part of the TIA.</p>
<p>1.6.7.2 Efficient use shall be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.</p>	
<p>1.6.7.3 As part of a multimodal transportation system, connectivity within and among transportation systems and modes should be maintained and, where possible, improved including connections which cross jurisdictional boundaries.</p>	<p>The Site is located within convenient walking distance of existing LTC transit services, with several bus routes in operation along the Queens Avenue, Dundas Street and Ridout Street North corridors. The LTC transfer system provides connectivity throughout the City and to regional transportation facilities (e.g., London International Airport, VIA Rail Station, Greyhound Bus Terminal).</p>
<p>1.6.7.4 A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.</p>	<p>The close proximity of the Site to established service/retail commercial uses, offices, cultural, heritage and entertainment facilities, institutional uses and neighbourhood parks would help future residents, employees and patrons minimize the length and frequency of vehicle trips. Convenient access to public transit, the Greyhound Bus Terminal, and the City's sidewalk and trail networks would also support alternative transportation modes. Furthermore, introducing an intensive residential use and additional employment</p>

PPS Policy	Response
	<p>opportunities on the Site would help to support existing and future investments in public transit (including the proposed BRT system).</p>
<p>1.7.1 Long-term economic prosperity should be supported by:</p> <ul style="list-style-type: none"> b) optimizing the long-term availability and use of land, resources, infrastructure, electricity generation facilities and transmission and distribution systems, and public service facilities; c) maintaining and, where possible, enhancing the vitality and viability of downtowns and mainstreets; 	<p>This intensification proposal has been designed to optimize the use of the subject lands for residential and office/commercial uses, while retaining the existing heritage buildings. The Site also benefits from close proximity to arterial road transportation networks, transit services and public facilities. It is expected that the residents and employees of the proposed tower would support these services and facilities.</p> <p>Additionally, as discussed, the proposal would accommodate a mix of high density residential and office/commercial uses which, collectively, would support efforts to revitalize the downtown core and encourage its continued development as a multi-functional regional centre.</p>
<p>1.8.1 Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and climate change adaptation through land use and development patterns which:</p> <ul style="list-style-type: none"> a) promote compact form and a structure of nodes and corridors; b) promote the use of active transportation and transit in and between residential, employment (including commercial and industrial) and institutional uses and other areas; e) improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion; 	<p>The proposal: supports intensive residential development; incorporates a compact design; and has regard for, and complements, the development context of the downtown core.</p> <p>Development of the proposed mixed-use, high-rise building would help diversify the range of residential and employment opportunities within Downtown London. Moreover, this project would help to support increased transit ridership and future investments in a BRT system.</p> <p>Introduction of additional residential units and office/commercial space on the subject lands would increase housing choice and employment in the downtown core. In light this, the project would help to shorten commuting requirements for local residents</p>

PPS Policy	Response
	and employees (thereby helping to decrease transportation congestion).
2.1.1 Natural features and areas shall be protected for the long term.	The preliminary Environmental Impact Study (EIS) prepared by Natural Resource Solutions Inc. (NRSI) in conjunction with this proposal provides mitigation measures to satisfy Policy 2.1.1.
2.4.1 Minerals and petroleum resources shall be protected for long-term use.	The subject lands do not contain any known mineral or petroleum resources.
2.5.1 Mineral aggregate resources shall be protected for long-term use and, where provincial information is available, deposits of mineral aggregate resources shall be identified.	The subject lands do not contain any known mineral aggregate resources.
2.6.1 Significant built heritage resources and significant cultural heritage landscapes shall be conserved.	The HIA prepared by AECOM sets out mitigation measures to satisfy Policy 2.6.1.
2.6.2 Development and site alteration shall not be permitted on lands containing archaeological resources or areas of archaeological potential unless significant archaeological resources have been conserved.	A Stage 1-2 Archaeological Assessment of the Site was conducted by AECOM. The assessment did not result in the identification of any archaeological resources on the property.

The 2014 Provincial Policy Statement seeks to achieve healthy, livable and safe communities by promoting efficient development and land use patterns. **Given the foregoing assessment, in our opinion the proposed redevelopment and intensification plan is consistent with the policies of the PPS.** In this regard, the intended use of the Site:

- Represents an efficient development that supports compact urban form, as it seeks to intensify lands situated within the City’s downtown core and located in the vicinity of prominent offices, retail/service commercial enterprises, government activities, recreational, entertainment and cultural facilities, and high-rise apartments;
- Proposes a development plan that: has regard for the established character of the surrounding area; is complementary with, and sympathetic to, existing heritage structures; is compatible with the existing development context; provides a pedestrian orientation; encourages active transportation; and is within close proximity of the arterial road network, transit services and municipal pathways;

- Introduces greater housing choice within the downtown core to help broaden the range and mix of housing available to current and future residents of Central London, and to help the City accommodate forecasted housing demands and achieve intensification targets;
- Integrates a mix of higher density residential and office/commercial uses, which collectively support efforts to revitalize the downtown core and encourage its continued development as a multi-functional regional centre. The proposal would also help to promote neighbourhood stability in the downtown core by diversifying the mix of housing available in this area (to better meet the changing needs of local residents over the long-term);
- Promotes a scale of residential development that would help to (1) optimize municipal investments in servicing infrastructure and public transit, (2) support the long-term viability of various non-residential activities in proximity to the Site, and (3) generate substantial tax revenues to benefit the financial well-being of the Province and the City; and
- Would not involve development on lands having known significant environmental, archaeological, mineral aggregate or petroleum resources.

4.2 City of London Official Plan (1989)

4.2.1 Overview

Policy 4.7 of the PPS states that Official Plans are the most important vehicle for implementation of the Provincial Policy Statement. It is further stated that Official Plans shall identify provincial interests and set out appropriate land use designations and policies. Accordingly, this proposal has been assessed relative to the applicable policies set out by the City of London Official Plan framework, which includes the City's 1989 Official Plan and new Official Plan (The London Plan).

The following discussion evaluates the merits of the proposal relative to the policy framework of the 1989 Official Plan. Section 1.2 of the 1989 Official Plan states that, "The Official Plan for the City of London contains City Council's objectives and policies to guide the short-term and long-term physical development of all lands within the boundary of the municipality." Policies defined within this Official Plan provide direction on a range of planning considerations, such as growth management, urban form, urban design and public consultation, in order to promote the physical development of a healthy, sustainable community.

4.2.2 Existing Designations

Figure 10 to this Report illustrates that the subject lands are designated 'Downtown' and 'Open Space' on Schedule 'A' (Land Use) of the 1989 Official Plan. Generally, the portion of the Site intended for redevelopment is designated Downtown, with lands adjacent to the Thames Valley corridor designated for open space purposes.

Section 4.1.1 of this Official Plan states that the Downtown designation supports the continued development of the core area as the primary business, administrative, institutional, entertainment and cultural centre for the City of London, as well as a regional centre for Southwestern Ontario. Pursuant to Section 4.1.6 of the Official Plan, the permitted uses in this designation include retail, service, office, institutional, entertainment, cultural, high density residential, transportation, recreational and open space uses.

In our opinion, the residential and office/commercial uses intended for the Site are consistent with the permissions of the Downtown designation. It is also our opinion that the proposal is consistent with the mixed-use development permissions of this designation as set out in Sub-Section iv):

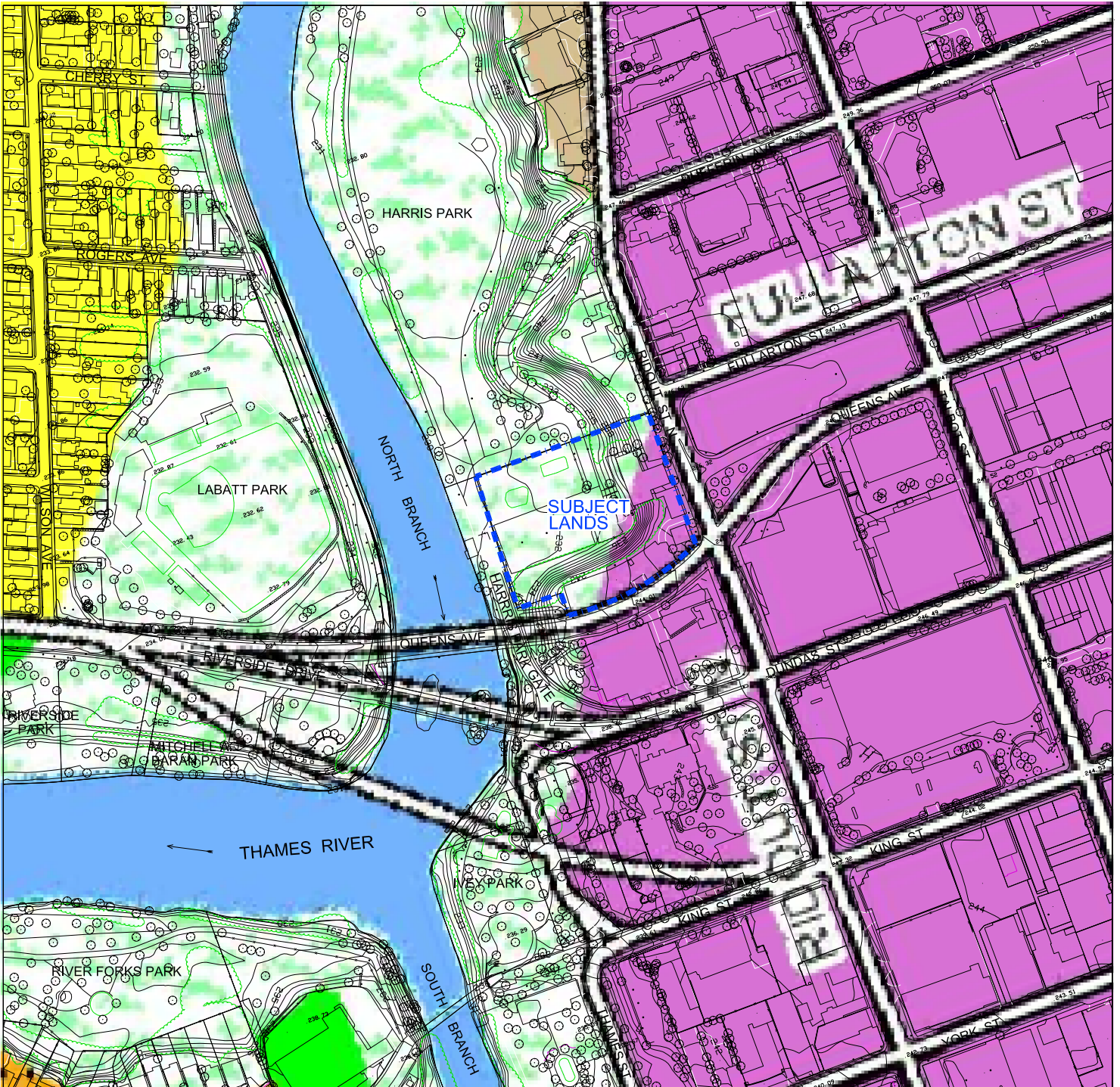
"iv) The development of a variety of high and medium density housing types in the Downtown will be supported. Residential units may be created through new development or through the conversion of vacant or under-utilized space in existing buildings. Residential development within the Downtown Shopping Area shall provide for retail or service-office uses at street level."

Pursuant to Section 8A.2.1 of the Official Plan, areas designated Open Space on Schedule 'A' shall consist of: public open space, including district, city-wide, and regional parks; private open space; flood plain lands; components of the City's Natural Heritage System; and lands that contribute to important ecological functions. In our opinion, as the proposal is consistent with these permissions, as development is not planned for the portion of the Site immediately adjacent to the Thames River corridor.

Additionally, natural heritage features contained within the Site are identified on Schedule B-1 (Natural Heritage Features) and Schedule B-2 (Natural Resources and Hazards) of the 1989 Official Plan. These features relate principally to the Open Space designation and are assessed as part of the preliminary EIS.

4.2.3 Planning Analysis: Applicable Policies

Chapter 2 (Planning Framework), Chapter 4 (Downtown and Commercial Land Use Designations), Chapter 11 (Urban Design Principles), Chapter 13 (Properties of Cultural Heritage Value or Interest) and Chapter 19 (Implementation) of the Official Plan include policies that are relevant to this application.

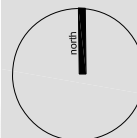


LEGEND

- MULTI FAMILY - HIGH DENSITY RESIDENTIAL
- MULTI FAMILY - MEDIUM DENSITY RESIDENTIAL
- LOW DENSITY RESIDENTIAL
- COMMUNITY FACILITY
- DOWNTOWN AREA
- OPEN SPACE

Figure 10
 1989 Official Plan
 Designations
 Schedule 'A'
 Plan for Land Use

SUBJECT LANDS



The following discussion: summarizes, in our opinion, the core Official Plan policies pertaining to this proposal; and evaluates the merits of this application relative to this policy framework.

4.2.4 Chapter 2 - Planning Framework

Section 2.3 of the Official Plan contains a number of guiding statements that reflect the objectives and policies contained in the Plan. Principles relevant to this proposal are discussed below.

“ii) Land use planning should promote compatibility among land uses in terms of scale, intensity of use and potentially related impacts.”

The layout and scale of the concept plan has been designed to be sensitive to the surrounding development context, which includes cultural and institutional uses, a major park and event facility, office uses, and a high-rise apartment building (The Harrison). Several design elements are incorporated into the development concept to promote compatibility with these surrounding uses, including:

- Maintaining the three heritage structures along Ridout Street North, and positioning the new tower to the rear of these structures to retain the character of the existing streetscape;
- Enhancing the interface between the downtown development context and the Thames River, particularly the Thames Valley Parkway which extends along the western property boundary; and
- Sizing the tower in a manner that complements, and is compatible with, other high-rise structures in the vicinity of the Site including the Ontario Court of Justice to the southeast and the Harrison high-rise apartment to the northeast.

“vii) Land use planning should promote attractive, functional and accessible site and building design which is sensitive to the scale and character of surrounding uses.”

The proposed building and site layout would provide a highly functional and accessible development and would integrate urban design enhancements to complement the existing downtown context.

Section 2.4.1 of the 1989 Official Plan describes a number of policies that are intended to guide the City’s structure over the life of this Plan. The following policies have particular importance to this proposal.

“vi) High and medium density residential development shall be directed to appropriate areas within and adjacent to the Downtown, near the periphery of Regional and Community

Shopping Areas, and in selected locations along major roads specifically along transit nodes and corridors as identified in Chapter 18, and near Open Space designations.”

The project would introduce a high density residential form within the City’s downtown core at a location fronting an arterial road and within convenient walking distance of public transit and the Thames Valley Parkway (a key component of the Natural Heritage System). Given these considerations and further commentary provided in this Report, in our opinion the subject lands are an appropriate location for the proposed high-rise tower.

“ix) While it is recognized that there may be redevelopment, infill, and intensification in some established residential neighbourhoods, higher intensity land uses will be directed to locations where the character of the residential area is enhanced and existing land uses are not adversely affected.”

Commentary and conceptual renderings presented in this Report demonstrate that the proposal has been designed with sensitivity to the local development context. In this respect, generally surrounding the Site are the following uses: Eldon House and Harris Park to the north, a high-rise apartment to the northeast; a parking lot and office uses to the east; the Ontario Court of Justice to the southeast; Museum London to the south, and the Thames Valley Parkway to the west. In our opinion, implementation of the proposed redevelopment plan would not adversely impact upon the mix of uses evident in this downtown neighbourhood. Regarding specific design characteristics, Section 3.1 of this Report sets out that the proposal is intended to complement the downtown area, be sympathetic to nearby heritage buildings and enhance the local streetscape.

“xviii) Within the boundaries of the City, as they exist over the planning period, the planning and servicing of land to meet residential, commercial and industrial development requirements shall incorporate a reasonable allowance for choice according to location, site area, servicing affordability and other criteria.”

The proposed redevelopment and intensification project would accommodate a maximum of 280 residential suites within the high-rise tower, as well as approximately 6,308 m² of office/commercial space. In effect, this project would support greater housing choice and employment opportunities in Downtown London. In our opinion, the project site is well suited for the intended residential and office/commercial uses, given that it is situated in a mixed-use development area and has excellent accessibility to the arterial road network, public transit facilities, entertainment and cultural facilities, shopping and employment areas, parkland and trail systems.

4.2.5 Chapter 4- Downtown Designation

(a) General Objectives

Section 4.1 of the 1989 Official Plan provides policy direction for development in the Downtown designation:

“It is intended that the Downtown will continue to be the major office employment centre and commercial district in the City, and that its major function as a location for new medium and high density residential environment will be strengthened over time. Limitations on the scale of development will be less restrictive in the Downtown and policies will allow for flexibility in the application of these limitations.”

The Site would introduce additional office/commercial space and high density residential components to help strengthen the office, commercial and residential sectors in the Downtown designation, respectively. In our opinion, the nature and scale of the proposal is in keeping with the policy direction noted above.

Section 4.1.1 of this Official Plan lists overall planning objectives for this designation. The following two objectives have particular relevance to this proposal:

- “ii) Concentrate the development of major office buildings, hotels, convention facilities, entertainment and cultural uses, major indoor sports facilities and government buildings, having City-wide or regional significance, within the Downtown;
- iii) Encourage growth in the residential population of the Downtown and adjacent gateway areas through new development and the renovation and conversion of existing buildings;”

The proposed redevelopment and intensification project would help the City achieve these Downtown objectives by adding office/commercial space and increasing the supply of residential dwelling units in a compact, intensive form.

(b) Urban Design Objectives

Section 4.1.2 of the 1989 Official Plan sets out the principal urban design policy direction for the Downtown designation:

- “i) Promote a high standard of design for buildings to be constructed in the strategic or prominent locations of the Downtown;
- ii) Discourage development and design treatments that are considered detrimental to the functional success and visual quality of Downtown;
- iii) Allow flexibility for individual design creativity and innovation;

- iv) To the extent feasible, position new development to minimize the obstruction of view corridors to natural features and landmarks;
- v) Design new development to complement the appearance and function of any significant natural features and public open spaces that are adjacent to the site;
- vi) Design new developments to provide for continuity and harmony in architectural style with adjacent uses that have a distinctive or attractive visual identity or are recognized as being of architectural or historic significance; and
- vii) Co-ordinate the planning and design of streetscape improvements in the Downtown including the upgrading of building façades, signage, sidewalks, lighting, parking areas and landscaping.”

The concept plan and renderings presented in this Report illustrate that the components of this development have regard for these matters. In summary, the design concept illustrated in these plans demonstrates that a high design standard is applied to this prominent tower. Further, the design is intended to contribute positively to both the local streetscape and the City’s downtown skyline.

Additionally, in our opinion:

- The prominent design elements of the tower would create an attractive gateway feature for the Forks of the Thames activity area; and
- The contemporary design of this high-rise building and associated landscaping complements the adjacent streetscape along Ridout Street North and Queens Avenue.

In light of these considerations, it is our opinion that the proposed development is consistent with the urban design direction set out for the Downtown designation.

(c) Permitted Uses

Section 4.1.6 of the 1989 Official Plan prescribes the permitted uses for the Downtown designation. This Section also states that Council shall support the continued development of the Downtown as a multi-functional regional centre containing a broad range of retail; service; office; institutional; entertainment; cultural; high density residential; transportation; recreational; and open space uses.

As discussed, the proposed redevelopment project would introduce a maximum of 280 residential suites within a high density housing form, as well as approximately 6,308 m² of complementary office/commercial space in the tower base. The proposed development would supplement the 1,627 m² of gross office space provided in the existing heritage buildings on the property.

(d) Scale of Development

Section 4.1.7 of the 1989 Official Plan states that the Downtown designation is to accommodate the greatest height and density of retail, service, office and residential development within London. Sub-Section i) sets out the permissions for development within this designation:

“Development in the Downtown may be permitted up to a maximum floor area ratio of 10:1 for commercial uses and will normally not exceed 350 units per hectare (140 units per acre for residential uses). Increases in density may be permitted without amendment to this Plan provided the proposal satisfies density bonusing provisions of Section 3.4.3 iv) and 19.4.4 of the Plan, conforms to the Site Plan Control By-law and addresses standards in the Downtown Design Guidelines. ...”

Pursuant to the More Homes, More Choice Act, 2019, the bonusing permissions set out in Section 37 of the Planning Act are to be removed following proclamation by the Lieutenant Governor. Given this impending amendment, we understand that the City of London will not consider bonusing zoning permissions in conjunction with new planning applications. Notwithstanding, this redevelopment plan has consideration for the bonusing criteria set out in this Official Plan (as discussed in Section 4.2.10 of this Report).

The design concept proposes a maximum of 280 dwelling units on the 0.73 ha portion of the Site zoned ‘Downtown Area (DA2(3))’; equating to a residential density of 383 units/ha. Additionally, pursuant to Section 3.4 1) of the Zoning By-Law, the non-residential component of the project is assessed at an equivalent rate of one (1) dwelling unit per 100.0 m² of gross floor area (GFA). Considering the total gross floor office area within existing heritage buildings (1,627 m²) and the area expressly dedicated for office/commercial space in the planned tower (6,308 m²), the residential density of the Site would equate to 493 units/ha. The 1989 Official Plan does not specify a maximum building height for development in the Downtown designation.

In light of these considerations and the impending removal of bonusing permissions, in our opinion, a new Specific Area policy would be required under Chapter 10 of this Official Plan in order to permit the increased residential density associated with this proposal. Specifically, a residential density of 500 units/ha is proposed to accommodate the intended development and the existing office space, and to recognize that minor refinements may be required to the DA2 Zone boundary through the course of project planning (which will impact upon the calculated density).

4.2.6 Chapter 10 – Policies for Specific Areas

In the context of the 1989 Official Plan, the development proposal requires a Specific Area policy to allow for a residential density that exceeds the standard permissions of the Downtown designation. Site-specific permissions are typically identified under Chapter 10

(Policies for Specific Areas) of this Official Plan. It is noted under Section 10.1.1 of this Plan that the adoption of policies for Specific Areas may be considered where one or more of the stated conditions apply. The following analysis evaluates this proposal relative to each condition:

“i) The change in land use is site specific, is appropriate given the mix of uses in the area, and cannot be accommodated within other land use designations without having a negative impact on the surrounding area.”

The OPA and ZBA applications request site-specific permissions for a prominent, mixed-use development that provides for a more intensive design than is allowed for under the standard permissions of the Downtown designation. Given the surrounding development context and the broader downtown setting, in our opinion this redevelopment proposal is appropriate for this particular site. Further, considering the urban structure of the 1989 Official Plan, in our opinion the Downtown designation is the most appropriate designation to implement the mix of uses associated with this proposal.

“ii) The change in land use is site specific and is located in an area where Council wishes to maintain existing land use designations, while allowing for a site specific use.”

The intent of the applications is to establish site-specific permissions supporting a prominent, high-rise tower located at a strategic gateway/riverfront property. In our opinion, the intended use of the subject lands is appropriate for the Downtown designation subject to approval of a Specific Area policy to recognize the proposed residential density. It is also our opinion that Council would prefer to approve this project by way of a Specific Area policy; rather than to broadly redesignate these lands and adjacent properties to allow for increased residential densities in this area.

“iii) The existing mix of uses in the area does not lend itself to a specific land use designation for directing future development and a site specific policy is required.”

As outlined in Section 2.2 of this Report, the subject lands form part of the Central London planning area which includes the downtown core and is comprised of a diverse mix of intensive land uses (e.g., offices, retail/service commercial enterprises, government activities, recreational, entertainment and cultural facilities). The Site is also located in proximity to a variety of these downtown land uses including apartment buildings, office towers, commercial areas and major civic attractions. Notwithstanding this development context, it is our opinion that the existing mix of uses in this area does not lend itself to a specific designation that would broadly permit the residential density associated with this proposal. Accordingly, in our opinion, a site-specific policy should be adopted to implement this project.

“iv) The policy is required to restrict the range of permitted uses, or to restrict the scale and density of development normally allowed in a particular designation, in order to protect other uses in an area from negative impacts associated with excessive noise, traffic, loss of privacy or servicing constraints.”

The development proposal is intended to permit a residential density in excess of the normal maximum density applied in the Downtown designation. In our opinion, the request to exceed the density requirement will not generate the types of land use conflicts set out in this policy. With respect to loss of privacy, in particular, it is our opinion that the proposed building has been positioned to provide adequate separation distance from surrounding development including surrounding high-rise towers.

Additionally, Section 10.1.2. of the 1989 Official Plan states that all applications contemplating policies for Specific Areas are subject to the Plan's Planning Impact Analysis. Section 4.5.2 of this Plan sets out criteria that municipal staff are to consider when evaluating the merits of planning applications pertaining to the Downtown designation. In our opinion, the following criteria are particularly relevant to this proposal:

- "i) the policies contained in the Section relating to the requested designation;
- ii) compatibility of proposed uses with surrounding land uses, and the likely impact of the proposed development on present and future land uses in the area;
- iii) the size and shape of the parcel of land on which a proposal is to be located, and the ability of the site to accommodate the intensity of the proposed uses;
- v) the potential traffic generated by the proposed change, considering the most intense land uses that could be permitted by such a change, and the likely impact of this additional traffic on City streets, pedestrian and vehicular safety, and on surrounding properties;
- vi) the height, location and spacing of any buildings in the proposed development, and any potential impacts on surrounding land uses;
- ix) the exterior design in terms of bulk, scale, and layout of buildings, and the integration of these uses with present and future land uses in the area and its conformity with the City's commercial urban design guidelines;
- x) the potential impact of the proposed development on surrounding natural features and heritage resources;
- xii) compliance of the proposed development with the provisions of the City's Official Plan, Zoning By-law, Site Plan Control By-law, and Sign Control By-law;"

Commentary provided throughout this Report and in corresponding reports demonstrates that the proposal has regard for matters relating to: the alignment of the project with the existing Downtown designation policy regime; compatibility with adjacent uses, the ability of the property and site servicing to accommodate the use; potential traffic impacts; building setbacks and the integration of the built form with surrounding development; urban design

elements; potential natural heritage impacts and compliance with City policies and regulations. In light of these considerations and other commentary provided in this Report, in our opinion implementation of this proposal will not generate significant land use impacts.

Based upon the foregoing, it is our opinion that the proposal satisfies the requirements for a Specific Area policy pursuant to Chapter 10 of the 1989 Official Plan.

4.2.7 Chapter 11 - Urban Design Principles

Section 4.1.7 ii) of the 1989 Official Plan directs that development proposals in the Downtown designation have regard for the urban design principles itemized in Chapter 11 of this Plan.

The urban design principles itemized within Chapter 11 (Section 11.1.1) supplement the applicable Urban Design Objectives identified under Section 4.1.2 of the Official Plan and discussed in Section 4.2.5 b) of this Report. These principles provide direction for matters related to the visual character, aesthetics and compatibility of land use, and to the qualitative aspects of development. As an overarching objective, it is also stated in this Sub-Section that:

“It is intended that Downtown development should enhance the street level pedestrian environment and contribute to the sensitive integration of new development with adjacent structures and land uses.”

In our opinion, the concept plan presented in Appendix ‘A’ demonstrates regard for the principles set out in Section 11.1.1. In particular, the design was developed with consideration for the following applicable design principles:

“Natural Features

- i) The form and design of new development shall complement and protect any significant natural features such as river valleys, ravines, wooded areas and parklands that form part of, or are located adjacent to, the site.”

The proposed tower design is intended to complement and frame the adjacent Thames River corridor, including the Harris Park entrance feature. As discussed, the project does not propose development on lands intended for open space.

“High Design Standards

- iv) Emphasis will be placed on the promotion of a high standard of design for buildings to be constructed in strategic or prominent locations such as within, and at the perimeter of, the Downtown, near the edge of the river valleys, or along the major entryways to the City.”

The redevelopment project proposes a high-rise tower design that would (1) create a strong visual presence along the Thames River corridor and (2) function as a focal point for the western gateway into the City's downtown core.

"Architectural Continuity

- v) The massing and conceptual design of new development should provide for continuity and harmony in architectural style with adjacent uses which have a distinctive and attractive visual identity or which are recognized as being of cultural heritage value or interest."

The proposed high-rise tower is designed to be compatible with to the surrounding context, which includes high-rise buildings to the southeast (Ontario Court of Justice), and northeast (The Harrison Apartment). The tower form is also designed to complement the character of the existing heritage buildings on the Site.

"Parking and Loading

- xiii) Parking and loading facilities and driveways should be located and designed to facilitate maneuverability on site, between adjacent sites where appropriate, and to reduce the traffic flow disruption resulting from turning movements to and from the property."

The redevelopment plan for the Site includes a reconfiguration of the vehicular access and parking arrangement. The revised parking, loading and access arrangement has been designed to promote safe and efficient ingress/egress consistent with the objectives of this policy.

"Recreational Facilities

- xvii) The developers of medium or high density residential projects shall be encouraged to provide recreational facilities appropriate to the size of the development and the needs and interests of the intended residents."

The Site benefits from a prominent location adjacent to Thames Valley Parkway and Harris Park. As illustrated in the conceptual landscape plan included in Appendix 'C', amenity areas and pedestrian walkways would be incorporated into the redevelopment plan to encourage further connectivity with these community parks.

"Gateways

- xxi) Gateways are important elements in the creation of a sense of place and arrival, and provide visual signals that both define and distinguish an area. Gateways occupy strategic and prominent locations, and are primarily associated with major entrances to the City, districts or to neighbourhoods. Gateways may be created through the placement of buildings, landscape features, or the design and architecture of the buildings or structures themselves that frame or create the gateway or entrance."

The Site is located in close proximity to the Forks of the Thames activity area and forms part of the western gateway to the City's downtown core. Given the prominence of this location, the proposed high-rise tower incorporates a high design standard to further define and distinguish this gateway, and to establish the Site as a focal point along the Thames River corridor.

4.2.8 Chapter 13 – Heritage Resources Policies

Policies set out in Chapter 13 of the 1989 Official Plan provide a framework: to encourage the protection and enhancement of heritage resources; to promote sensitive design; and to guide the designation and maintenance of Heritage Conservation Districts (HCD). Section 13.1 indicates the key objectives of the Official Plan in relation to cultural heritage including (1) the protection and enhancement of cultural resources (e.g., buildings, sites) and (2) the encouragement of new development and redevelopment to be sensitive to heritage resources.

Section 13.3.6 of this Official Plan sets out guiding policies for designated HCDs, including the following provisions applicable to the proposal:

- i) the character of the District shall be maintained by encouraging the retention of existing structures and landscape features;
- ii) the design of new development, either as infilling or as additions to existing buildings, should complement the prevailing character of the area;
- iii) regard shall be had at all times to the guidelines and intent of the Heritage Conservation District Plan; "

The Site is located within the Downtown HCD which is generally described in Section 13.3.8.5. It is stated in this Section that this district (1) encompasses a portion of the Downtown and (2) contains the greatest collection and variety of heritage buildings in the City.

Section 3.2 of the Downtown London HCD Plan (March 2012) sets out the physical and social goals/objectives for this Heritage District, including the following which have importance to this proposal:

- Establish the framework for the retention, conservation, and adaptation of the existing stock of significant heritage buildings and spaces within the Downtown District;
- Influence the renovation or construction of modern era buildings so that it is done with regard to the District and complementary to the character and streetscape;

- Emphasize the significance of the cultural heritage and its role in defining the sense of place for the Downtown;
- Increase tourism across the District; and
- Encourage the redevelopment, intensification, and acceptance of the Downtown as the cultural and social focus of the community.

The AECOM HIA addresses the 1989 Official Plan policy framework respecting heritage resources, as well as the principles and guidelines of the HCD Plan. The study generally concludes that to mitigate the potential direct and indirect impacts to identified cultural heritage value, mitigation strategies described in the report should be considered in conjunction with project refinements and approaches. Further, it is recommended that details related to the exterior design, the streetscape character, and the future re-use of the heritage structures should be considered in depth as a part of the proposed project (in order to mitigate impacts, and to conserve the cultural heritage value of the property).

4.2.9 Chapter 19 – Implementation

(a) Guideline Documents

Section 19.2 of the Official Plan prescribes that guideline documents may be used to assist in the implementation and refinement of the Official Plan. Given the development context of the Site and the nature of this proposal, the project design has had regard for several approved guidelines; most notably ‘Our Move Forward (London’s Downtown Plan)’, dated April 2015, and the ‘City of London Placemaking Guidelines’ (November 2007).

(b) The Downtown Plan

Framework and Objectives

The planning framework for the Downtown Plan states that the plan was developed with consideration for the existing development context and establishes a planning structure for future public and private investment in the City’s core. Further, this guideline establishes several overarching values, directions and themes to achieve the defined Downtown vision statement: “London’s face to the world. A vibrant destination. A unique neighbourhood”.

Nine specific ‘Downtown’ values are established in the Downtown Plan: Leadership, Prosperity, Sustainability, Livability, Innovation, Partnership, Inclusivity, Experience and Heritage. Moreover, six ‘Strategic Directions’ are identified to support the identified values for this area:

1. Make Dundas Street the most exciting place in London;
2. Reconnect with the Thames River;
3. Forge connections with the downtown neighbourhoods;
4. Green our downtown;
5. Build a great neighbourhood; and
6. Create the buzz.

In our opinion, the characteristics of this development proposal illustrate that the project is in keeping with the values, strategic directions and associated urban design objectives of the Downtown Plan. In particular, it is our opinion that the project supports those initiatives related to reconnecting with the Thames River, building a great neighbourhood and 'creating the buzz'. The merits of this project relative to each of these Strategic Directions is summarized below.

- **Reconnect with the Thames River.** Strategic Direction 2 of the Downtown Plan addresses a City objective to reconnect London residents with the Forks of the Thames activity area. In this regard, it is noted in the Plan that, "The river is also a draw for events and represents an opportunity for new active uses. In re-establishing the connection to the Thames River, we can help to create a London that is a vibrant and dynamic city that embraces both its cultural heritage and natural environment". As discussed in this Report, it is our opinion that the form and design of the planned tower would create an attractive gateway feature to help frame this activity area. Additionally, the project would integrate improvements to pedestrian connections in the vicinity of the Thames River corridor. In our opinion, both of these measures support the core objectives of this Strategic Direction.
- **Build a Great Neighbourhood.** In relation to Strategic Direction 5, it is stated in the Downtown Plan that, "The downtown is the "hub" for the city, but it is also a neighbourhood where people can live and be social. It is imperative for the downtown's success to ensure that it is designed to be a neighbourhood first, by providing for the local needs of the residents in the area". As identified in this Report, the proposed high-rise tower is designed to function as a community focal point that complements surrounding land uses, the local development context and the larger downtown core. In light of the building positioning, site layout, architectural design, and intended uses, it is our opinion that the proposal supports the broad objective of this Strategic Objective to enhance the function of the local neighbourhood.
- **Create the buzz.** The Downtown Plan states the following in relation to Strategic Direction 6, "The diversity, intensity and density that uniquely characterize the core makes it ideally suited to consider unconventional ideas and fertile ground for testing new ways of doing things". In our opinion, the nature of this proposal, to integrate a high-rise tower with existing heritage buildings to further define the Downtown's western gateway and the Thames River corridor, closely aligns with the type of unique, intensive project envisioned to support this Strategic Direction.

Transformational Projects

The Downtown Plan also sets out a variety of initiatives that support ten 'Transformational Projects' designed to help implement the vision, values and strategic directions of this guideline. Transformational Projects are described in the Downtown Plan as initiatives, "... designed to act as anchors for future development and to encourage more private sector investment to provide maximum benefit for the downtown and assist with continued revitalization of this important area of the city".

Four Transformational Projects have been identified in proximity to this Site. The following discussion provides a general overview of these projects as set out in the Downtown Plan:

- **Cross-River Connection.** This project consists of a significantly enhanced connection between the east and west sides of the Thames River, by improving the pedestrian crossing experience and creating a distinctive sense of place when entering the downtown. In particular, this project would convert Kensington Bridge into a non-vehicular connection across the Thames River to connect the downtown with the westerly neighbourhoods and Labatt Park. In effect, repurposing the bridge would establish a plaza between Museum London and the former Middlesex Court House, and connect Dundas Place with the Forks of the Thames.
- **Forks of the Thames.** The Forks of the Thames project envisions an urban promenade along the Thames River corridor and an urban park space at the western terminus of Dundas Street. Generally, the intent of this initiative is to better connect activity on Dundas Place with riverfront activities.
- **Laneway Connections.** The Downtown Plan supports additions and enhancements to the laneway network, as well as the integration of these laneways into future developments (to create small-scale restaurant and retail 'spill out' spaces). In the vicinity of the project site, this Plan identifies a laneway enhancement opportunity for the mid-block connection between Queens Avenue and Dundas Streets.
- **Queens Station.** This project intends to establish a new transit hub focused at the intersection of Queens Avenue and Richmond Street. This transit hub would be developed to be easily distinguishable as a primary city transit transfer point.

In our opinion, this proposal supports the Transformational Projects identified above, as it would intensify nearby lands with new residents and employees who would utilize, and derive benefit from, these projects. In this respect, it is fully anticipated that development of the proposed tower would contribute to the overall vibrancy of the activities, services and public spaces identified above.

(c) City of London Placemaking Guidelines

The City of London Placemaking Guidelines are intended to promote liveable communities, an identifiable character and a sense of place. Notwithstanding that this Guideline is generally intended for large scale 'greenfield' development, a number of goals and themes set out in this document are relevant to redevelopment and intensification plans.

The following summarizes the principal (core) Placemaking Guidelines that provided design direction for this project:

Site Context and Community Elements

- Establish key social, pedestrian and public transit connections between new development and the existing fabric of the city.
- Develop an overall concept plan which clearly identifies the relationship between land uses, built form and natural features of the community.
- Develop a circulation plan identifying where linkages would be established to support pedestrian, automobile, cycling movements throughout the community.
- Buildings should be located close to the street and should be architecturally articulated to provide an appropriate level of detail that would visually animate the streetscape.

Focal Points, Public Realm and Residential Design

- Utilize paving and landscaping treatments in the design of visual focal points.
- Design convenient pedestrian linkages to focal points and public transit.
- Employ exterior building materials and colours that are stylistically appropriate.
- Avoid architectural designs that are ubiquitous and non-descript because they do not contribute to a sense of place.
- Where appropriate design for the mutually compatible integration of low, medium and high density residential uses through the effective use of: site planning, building massing and orientation, architectural and landscape design, visual impact analysis.
- A mix of housing opportunities can accommodate the changing lifestyles of an aging population while allowing neighbours to continue to live in the community.

Pedestrian Environments

- Design pedestrian environments that provide a sense of safety and separation from automobile traffic.
- Orient buildings, their massing, architectural elements and habitable areas so that they promote an eyes-on-the-street approach to streetscapes and public spaces.
- Use architectural and landscape design to enhance visually prominent locations.
- Design buildings and spaces to encourage social interaction.

4.2.10 Height and Density Bonusing

Section 19.4.4 of the 1989 Official Plan defines the principles and objectives for implementing height and density bonusing opportunities within the Zoning By-law (pursuant to the permissions prescribed in Section 37 of the Planning Act). Sub-Policy ii) states that bonusing will be used to support the City's urban design principles and other policies of the Plan, and to support one or more of the defined bonusing objectives. Notwithstanding the impending removal of bonusing permissions from the Planning Act, the merits of this application have been reviewed relative to the bonusing objectives of this Section.

For this proposal, a maximum residential density of 500 units/ha is requested to permit the proposed mixed-use development in the context of the Downtown designation. In light of the enhanced urban design elements associated with this proposal as described and illustrated in this Report, it is our opinion that increased density is warranted for this project in light of the City's bonusing objectives set out in Sub-Policy ii):

- “(b) to support the provision of common open space that is functional for active or passive recreational use;
- (c) to support the provision of underground parking;
- (d) to encourage aesthetically attractive residential developments through the enhanced provision of landscaped open space;
- (h) to support innovative and environmentally sensitive development which incorporates notable design features, promotes energy conservation, waste and water recycling and use of public transit;
- (j) to support the provision of design features that provide for universal accessibility in new construction and/or redevelopment.”

Section 5.2.2 of this Report discusses the site specific zone structure proposed to accommodate the increased residential density associated with the planned development.

4.2.11 Summation

Given these considerations and our broader review of the 1989 Official Plan, with a Specific Area policy permitting a residential density of 500 units/ha, in our opinion the proposal is consistent with the principles, policy direction and development permissions of the Downtown designation. In this regard, implementation of this project would complement the surrounding development context and support the redevelopment and intensification of lands designated for a broad mix of uses including high density residential, office and commercial uses. Moreover, the concept plan incorporates elements that collectively support the urban design principles and bonusing objectives of this Official Plan, the revitalization

objectives of the City's Downtown Plan and the design direction of the City's Placemaking Guidelines.

4.3 City of London Official Plan (The London Plan)

4.3.1 Status

The City of London Council adopted a new Official Plan on June 23, 2016 and the Ministry of Municipal Affairs (MMA) issued its approval of The London Plan, with modifications, on December 30, 2016.

Several policies and schedules of the new Official Plan applicable to the Site were appealed to the Ontario Municipal Board and are not currently in effect. Notwithstanding, the following discussion describes how the proposal aligns with the policy direction and development provisions of The London Plan as approved by the MMA.

4.3.2 Place Type and Permitted Uses

Under The London Plan, the portion of the Site to be developed is generally located within the 'Downtown' place type on the land use schedule ('Map 1 - Place Types') with the balance of the property designated 'Green Space' place type (refer to **Figure 11**).

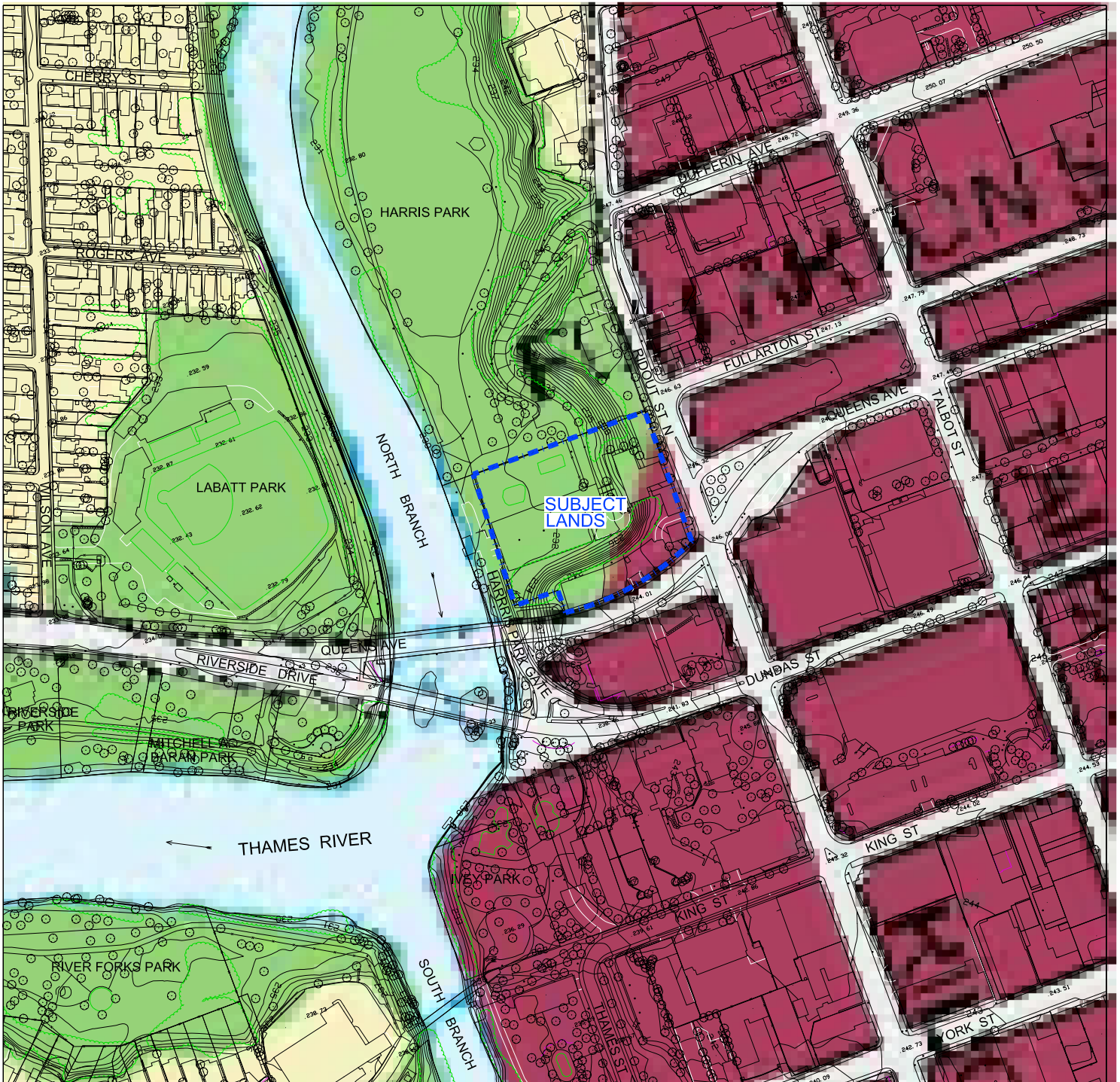
Policies 793 and 798 address the vision and role of the Downtown in the City of London structure, and emphasize the importance of a diverse, vibrant and connected core community:

"793. Our Downtown will exude excitement, vibrancy, and a high quality of urban living.

It will be the preeminent destination place for Londoners, residents from our region, and tourists to experience diverse culture, arts, recreation, entertainment, shopping and food. Our Downtown will showcase our history and offer vibrant and comfortable public places filled with people, ranging from large city-wide gathering places, to heavily treed urban plazas and intimate parkettes.

798. As shown in our City Structure Plan, **the Downtown will serve as the highest-order mixed-use centre, and will be unique in the city.** It will be connected to the transit villages through rapid transit corridors, and will also be connected to our recreational network, at the confluence of the two branches of the Thames River. Major rail lines, serving commuter traffic, strongly connect our Downtown to the surrounding region, nationally and internationally." (emphasis added)

Policy 800 of this Official Plan states that a broad range of residential, retail, service, office, cultural, institutional, hospitality, entertainment and recreational uses are permitted in the Downtown place type. Pursuant to Policy 802(1), the minimum permitted building height



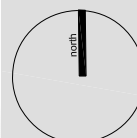
LEGEND

- NEIGHBOURHOODS
- GREEN SPACE
- DOWNTOWN

Figure 11
The London Plan

Map 1
Place Types

SUBJECT LANDS



within this designation is three (3) storeys or 12 metres, with the maximum building height being 20 storeys with 'Type 1' bonus zoning or 35 storeys with 'Type 2' bonus zoning. The London Plan does not specify minimum or maximum residential densities for this place type.

Policy 762 of the new Official Plan generally prescribes that lands in the Green Space place type can be utilized for passive/active recreational uses, community facilities, private green space, agricultural, woodlot management, conservation and stormwater management (depending upon the natural heritage features contained on the lands and potential hazards). In the context of this proposal, lands in the Green Space place type are to be retained for open space consistent with the above-noted permissions. Additionally, natural heritage features contained within the Site are identified on Map 5 (Natural Heritage) and Map 6 (Hazards and Natural Resources) of The London Plan. These features relate principally to the Green Space place type and are discussed in the preliminary EIS.

Given this framework, the height of the proposed high-rise tower exceeds the permissions set out in the new Official Plan under both standard and bonused conditions. Accordingly, to implement the project under the policies of The London Plan, a Specific Area policy for the Downtown place type will be required to permit a building form on the Site having a maximum building height of 40 storeys.

City staff have advised that notwithstanding active appeals to applicable policies of The London Plan, an Official Plan Amendment is necessary (1) to add a Specific Area policy for the Downtown place type and (2) to delineate the subject lands on Map 7 (Specific Policy Areas). The Downtown and Green Space place type boundaries of Map 1 may also be refined in conjunction with this application.

4.3.3 Built Form Policies (Downtown Place Type)

Policy 803 of The London Plan identifies a series of built form policies for the Downtown place type. In our opinion, the following policies are most relevant to this application:

- "1. Downtown will be subject to the following policies: All planning and development applications will conform with the City Design policies of this Plan, Our Move Forward: London's Downtown Plan and the Downtown Design Manual.
2. All planning and development applications will conform with the Downtown Heritage Conservation District Plan and related guidelines.
3. All the planning and design that is undertaken Downtown will place a priority on the pedestrian experience through site layout, building location, and a design that reinforces pedestrian comfort and safety.
4. The design and positioning of new buildings in the Downtown will not negatively impact pedestrian comfort by introducing inappropriate wind turbulence and velocity within the public realm. A wind assessment will be required for all buildings of 6 storeys or more,

with the intent of mitigating wind impacts on the pedestrian and other ground level environments.

5. Buildings should be designed to include architectural features that protect pedestrians from rain and sun exposure. Such features include, but are not limited to, awnings, arcades, and overhangs and should be designed in an unobtrusive manner.
6. The design of new development will provide for continuity and harmony in architectural style with adjacent uses that are of architectural or historical significance.
7. Building design that represents individual creativity and innovation will be encouraged within the Downtown to create landmarks, develop a distinctive character for the Downtown, and contribute to the city's image."

The design direction of The London Plan identified above is largely consistent with the 1989 Official Plan and has been considered in the development of this proposal as detailed in this Report. Taking these matters into account, in our opinion the design concept is in keeping with the built form policy permissions of this Official Plan.

4.3.4 City Design

With respect to the City Design component of The London Plan referenced above, Policies 189 to 306 of The London Plan define the urban design principles and policies that are intended to guide the character and form of development.

The overarching objectives of these policies are outlined in Policy 193:

"In all of the planning and development we do and the initiatives we take as a municipality, we will design for and foster:

1. A well-designed built form throughout the city.
2. Development that is designed to be a good fit and compatible within its context.
3. A high-quality, distinctive and memorable city image.
4. Development that supports a positive pedestrian environment.
5. A built form that is supportive of all types of active mobility and universal accessibility.
6. High-quality public spaces that are safe, accessible, attractive and vibrant.
7. A mix of housing types to support ageing in place and affordability.

8. Sustainably designed development that is resilient to long-term change.
9. Healthy, diverse and vibrant neighbourhoods that promote a sense of place and character.”

In our opinion, the project description, concept plan and renderings included in this Report demonstrate that the proposed redevelopment and intensification project has been designed to achieve these broad objectives, where applicable. Further, it is our opinion that the project design aligns with the intent of the character, street network, streetscape, public space, site layout and building form policies set out in the City Design section of the new Official Plan.

Most notably, it is our opinion that the design of the proposed tower described and illustrated in this Report supports The London Plan policy direction for high-rise buildings. Policies 289, 292 and 293 are particularly relevant to high-rise design and, in our opinion, are satisfied by the proposed tower arrangement:

”289_ High and mid-rise buildings should be designed to express three defined components: a base, middle, and top. Alternative design solutions that address the following intentions may be permitted.

1. The base should establish a human-scale façade with active frontages including, where appropriate, windows with transparent glass, forecourts, patios, awnings, lighting, and the use of materials that reinforce a human scale.
2. The middle should be visually cohesive with, but distinct from, the base and top.
3. The top should provide a finishing treatment, such as a roof or a cornice treatment, and will serve to hide and integrate mechanical penthouses.

292_ High-rise buildings should incorporate a podium at the building base, to reduce the apparent height and mass of tall buildings on the pedestrian environment, allow sunlight to penetrate into the right-of-way, and reduce the wind tunnel effect.

293_ High-rise buildings should be designed with slender towers that reduce shadow impact, minimize the obstruction of views, and are less massive to neighbouring properties. A typical floor plate of approximately 1,000m² is a reasonable target to achieve this goal. Commercial towers may have larger floor plates, but should still have effective separations between towers to allow access to sunlight and views.” (emphasis added)

4.3.5 Type 2 Bonus Zoning

Policy 1652 of The London Plan states that for Type 2 bonus zoning, additional building height may be permitted in exchange for certain facilities, services, or matters. Notwithstanding that the proposal would be implemented by way of a Specific Area policy rather than a Type 2 bonusing permission, in our opinion, design elements encompassed with the concept plan align with bonusable items set out in Policy 1652 as discussed below.

- Exceptional site and building design. As discussed in Sections 3.2 and 4.2.6 of this Report, collectively the building design and site layout incorporate contemporary architectural themes and design elements to establish a prominent, intensive high-rise design that is compatible with adjacent heritage buildings, surrounding land uses, the local development context and the larger downtown core. Additionally, vehicular parking is to be predominately accommodated in structured parking facilities and screened from view from the Ann and St. George Street frontages.
- Cultural Heritage Resources and Conservation. Three buildings are currently contained on the Site: a two storey office building (435 Ridout Street North), a three storey office building (441 Ridout Street North), and a split level, three storey office building (451 Ridout Street North). These buildings are listed under Part IV of the Ontario Heritage Act, and collectively encompass a National Historic Site. The proposed tower has been designed in a manner that is sensitive to these existing heritage buildings, and to effectively integrate with 451 Ridout Street. Moreover, the proposed building arrangement is intended to preserve the unobstructed view of 435, 441 and 451 Ridout Street North from the street frontage and to promote a landmark vista at the western terminus of Queen Street. No modifications are proposed to the heritage buildings addressed 435 and 441 Ridout Street North.
- Sustainable Forms of Development. The proposed development will be designed and built with consideration for suitable sustainability techniques, materials and systems. Additionally, landscape plans for common outdoor amenity areas will consider several sustainable design elements, including hard landscape elements and drought resistant landscaping to reduce water consumption.
- Measures to Enhance Natural Heritage System. Bank stabilization measures, including a landscape program, will be implemented along the western limit of the development area. Grading and plantings associated with the stabilization project will help to enhance the Thames River corridor natural heritage system.
- Large quantities of secure bicycle parking and cycling infrastructure. Secure bicycle parking will be provided in the underground parking structure for building residents. Public bicycle parking would also be provided for the new high-rise tower at convenient outdoor locations, where appropriate. Moreover, it is anticipated that internal pathway connections from the tower site and surface parking areas will provide additional connectivity to the street frontages, transit stops and the Thames River corridor.
- Other facilities, services, or matters that provide substantive public benefit. Further discussions may be required with City staff to explore opportunities for the inclusion of additional items in a community benefits program for this project (e.g., public plazas, on-site local art displays).

Additionally, the Policies 1653 and 1654 provide direction to City Council for the application of Type 2 bonusing:

“1653_Type 2 Bonus Zoning will only be permitted where it is demonstrated that the resulting intensity and form of the proposed development represents good planning within its context.

1654_ Greater height or density offered through Type 2 Bonus Zoning will be commensurate with the public value of the facility, service or matter that is provided.”

The planning merits and enhanced design elements of this proposal are described and illustrated in this Report. In light of these considerations, in our opinion bonusing for additional building height on the Site would be (1) appropriate for the local development context and (2) commensurate with the public benefit derived from project enhancements (notwithstanding the impending removal of bonusing permissions from the Planning Act). It is therefore our opinion that the proposal fulfills the requirements of Policies 1653 and 1654, as well as the broader bonus zone policy direction set out in The London Plan.

4.3.6 Specific Area Policies

Policy 1730 of the Plan states that, in limited circumstances, adoption of policies for Specific Areas may be considered. This Policy further prescribes that Specific Area policies may be considered where five specific conditions are satisfied. The following evaluates the proposal relative to each condition:

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

Based upon our review of The London Plan policies and permissions, in our opinion, the redevelopment proposal satisfies all policies of the Plan other than the maximum building height policy.

“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 OPA application seeks to exceed the 35 storey maximum building height permission of the Downtown place type (where Type 2 bonusing is applied). In our opinion, the merits of this proposal set out in this Report warrant the requested 40 storey building height (e.g., unique building arrangement, prominent tower design, gateway location, high design standard, opportunity for land dedication).

Given these considerations and related commentary in this Report, in our opinion this proposal would not adversely impact upon the integrity of the building form and intensity policies established for the Downtown place type or applicable City Design policies.

“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.”

As discussed in this Report, the proposed redevelopment plan would integrate a prominent high-rise tower with existing heritage buildings at a strategic gateway/riverfront property. In our opinion, this proposal represents a distinct, site-specific development opportunity that would not establish a precedent for other properties in the downtown core.

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

The proposed tower has been designed and positioned to integrate effectively with existing heritage buildings and to avoid encroachment into the adjacent floodplain. The requested building height permits the proposed unit yield to be contained within a slender point tower, while also accommodating four storeys of office/commercial space in a tower base. In our opinion, this base and tower configuration contributes positively to the existing, pedestrian oriented streetscape.

In order to bring the proposal into conformity with The London Plan Type 2 bonusing permissions, at a minimum, the tower height would need to be reduced by five storeys. To accommodate the intended apartment yield, the floorplate would need to be widened in a manner that could potentially (1) compromise the tower’s relationship with the adjacent heritage buildings and streetscape and/or (2) require encroachment into the adjacent floodplain. In our opinion, these modifications would detract from the overall merits of the proposal and may not be feasible given the development constraints of this Site. Accordingly, it is our opinion that the tower design cannot be reasonably altered to align with the maximum building height permission of the Downtown place type.

“5. The proposed policy is in the public interest, and represents good planning.”

Given planning rationale set out in this Report, with the benefit of the proposed Specific Area policy, in our opinion the applications are consistent with the policy direction and objectives of the Provincial Policy Statement, the City’s 1989 Official Plan and The London Plan. Accordingly, it is our opinion that for this distinctive project, a Specific Area policy represents good planning and would appropriately implement the project.

Additionally, Policy 1732 of The London Plan states that all applications contemplating policies for Specific Areas are subject to the Planning and Development Applications component of the Plan. Specifically, Policy 1578 of the Plan sets out a variety of criteria to be considered when evaluating the merits of planning applications.

In our opinion, relevant matters set out in Policy 1578 have been contemplated in the building design and site layout, and related policies have been addressed in this Report. Most notably, Sub-Policy 6 identifies a number of potential impacts to nearby properties to be evaluated in the context of a development application. In our opinion, collectively, the design elements of this proposal effectively address several key considerations identified in this Sub-Policy, including traffic and access management, parking, shadowing, visual impacts, impacts on cultural heritage resources and impact on natural heritage areas. Additionally, with respect to Sub-Policy 7 which addresses 'fit', in our opinion the proposed building form and site layout demonstrate that the project is designed to be compatible with, and sympathetic to, the surrounding development context.

Given the foregoing, in our opinion, the proposal satisfies the framework of planning criteria prescribed in The London Plan for a Specific Area policy.

4.3.7 Conclusion

In light of these considerations, it is our opinion that the proposed development supports the broad vision and role established for the Downtown place type in The London Plan. Further, with a Specific Area policy allowing for a maximum building height of 40 storeys, the proposal would align with the development permissions prescribed for this place type (recognizing that applicable development intensity and building form policies are under appeal and are not currently in effect).

5.0

ZONING BY-LAW ANALYSIS

5.1 Existing Zoning

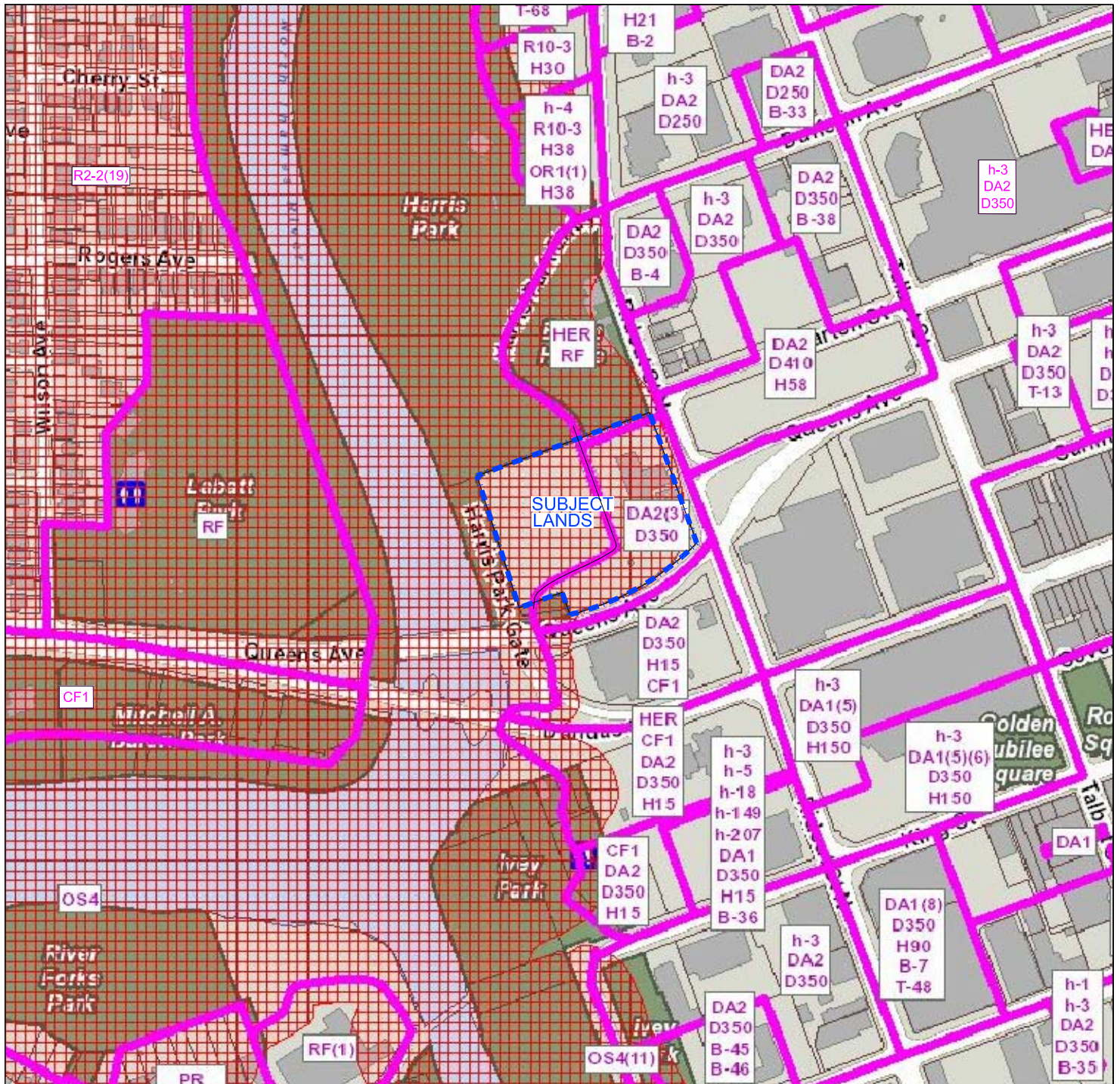
Figure 12 illustrates that two separate zones are applied to the Site pursuant to Zoning By-law No. Z-1. The developed portion of the property fronting the Queens Avenue and Ridout Street North corridors is zoned 'Downtown Area (DA2(3); D350)'. The balance of the property is zoned 'Open Space (OS4)', which is consistent with the zoning applied to the Thames River corridor and Harris Park.

Section 20.1 of the Zoning By-law states that the Downtown Area (DA) Zone, "... provides for and regulates the City's most dominant and intensive commercial business area which serve the City and region". It is also stated in this Section that the DA2 Zone variation is applied to peripheral areas of the Downtown located outside of the main retail shopping area centred along Dundas and Richmond Streets.

Generally, the DA2 Zone permits a wide variety of land uses including retail stores, entertainment facilities, institutional uses, public facilities, offices and apartment buildings. In accordance with Section 20.4 b) of the Zoning By-law, the DA2(3) Zone Variation applied to the Site limits development to existing uses. Specifically, permitted uses are only those in existing buildings and the permitted height is as existing on the date of the passing of the Zoning By-law. The 'D350' provision applied to the zoning establishes a maximum residential density of 350 units/ha.

Section 36.1 of the Zoning By-law states that the OS4 Zone is applied to lands having physical and/or environmental constraints to development. Additionally, it is stated in this Section that:

"The OS4 Zone variation is intended to be applied to hazard lands; specifically the floodway, steep slopes and lands that may be subject to erosion as well as landfills and contaminated sites. Development within the OS4 Zone is regulated pursuant to the Conservation Authorities Act. The variation is intended to provide for development of low impact recreational facilities that do not normally include structures or buildings, and require locations within or adjacent to the floodplain."

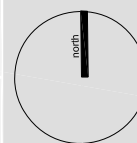


ZONING LEGEND

- █ ZONE LIMIT
- R2 RESIDENTIAL R2 ZONE
- DA DOWNTOWN AREA ZONE
- OR OFFICE RESIDENTIAL ZONE
- RF REGIONAL FACILITY ZONE
- HER HERITAGE ZONE
- CF COMMUNITY FACILITY ZONE
- T TEMPORARY ZONE
- OS OPEN SPACE ZONE
- h HOLDING PROVISION
- H HEIGHT PROVISION
- PR PRIVATE ROAD PROVISION
- D DENSITY PROVISION
- B BONUSING PROVISION
- CONSERVATION AUTHORITY REGULATED AREAS

**Figure 12
Existing Zoning**

SUBJECT LANDS



In light of these considerations, the existing DA2(3) and OS4 Zone structure does not permit the intended building form or site layout. Accordingly, a Zoning By-law Amendment is required to facilitate the proposed development.

5.2 Proposed Zoning

5.2.1 Zoning Review

Following an analysis of the Zoning By-law, it is our opinion that the form and scale of the proposed development most closely aligns with the planned function of the Downtown Zone regime and the standard permissions of the DA2 Zone variation.

Table 20.3 of the Zoning By-law prescribes the site and building regulations for the DA2 Zone. The following table compares the concept plan layout with several of applicable development regulations. Additionally, a Zoning Data Sheet providing a more detailed zoning analysis of the proposal been prepared by MHBC in support of the OPA/ZBA application.

Table 4.0 - Selected Zoning Regulations (DA2 Zone)

Regulation	Required	Provided
Lot Area (min.)	N/A	14,008 m ²
Lot Frontage (min.)	3.0 m	97.1 m
Building Setbacks (min.)		
Front Yard	0.0 m	3.1 m
Interior Side Yard	0.0 m	4.93 m
Exterior Side Yard	0.0 m	4.52 m
Rear Yard	0.0 m	3.0 m (DA2 Zone limit)
Building Height (max.)	90 m*	123.9 m
Landscaped Open Space (min.)	5%	34.7% (DA2 Zone limit)
Lot Coverage (max.)	97%	35.0% (DA2 Zone limit)
Residential Density (max.)	350 units/ha	500 units/ha
Off-Street Parking (min.)	71 spaces	371 spaces
Bicycle Parking (min.)	7	> 7 spaces

* Pursuant to the DA2(3) special provision, maximum building height for Site is the existing condition.

As illustrated, the proposed building scale and site layout meets most standard DA2 Zone regulations; however a site-specific DA2 Zone variation is proposed to address the following matters:

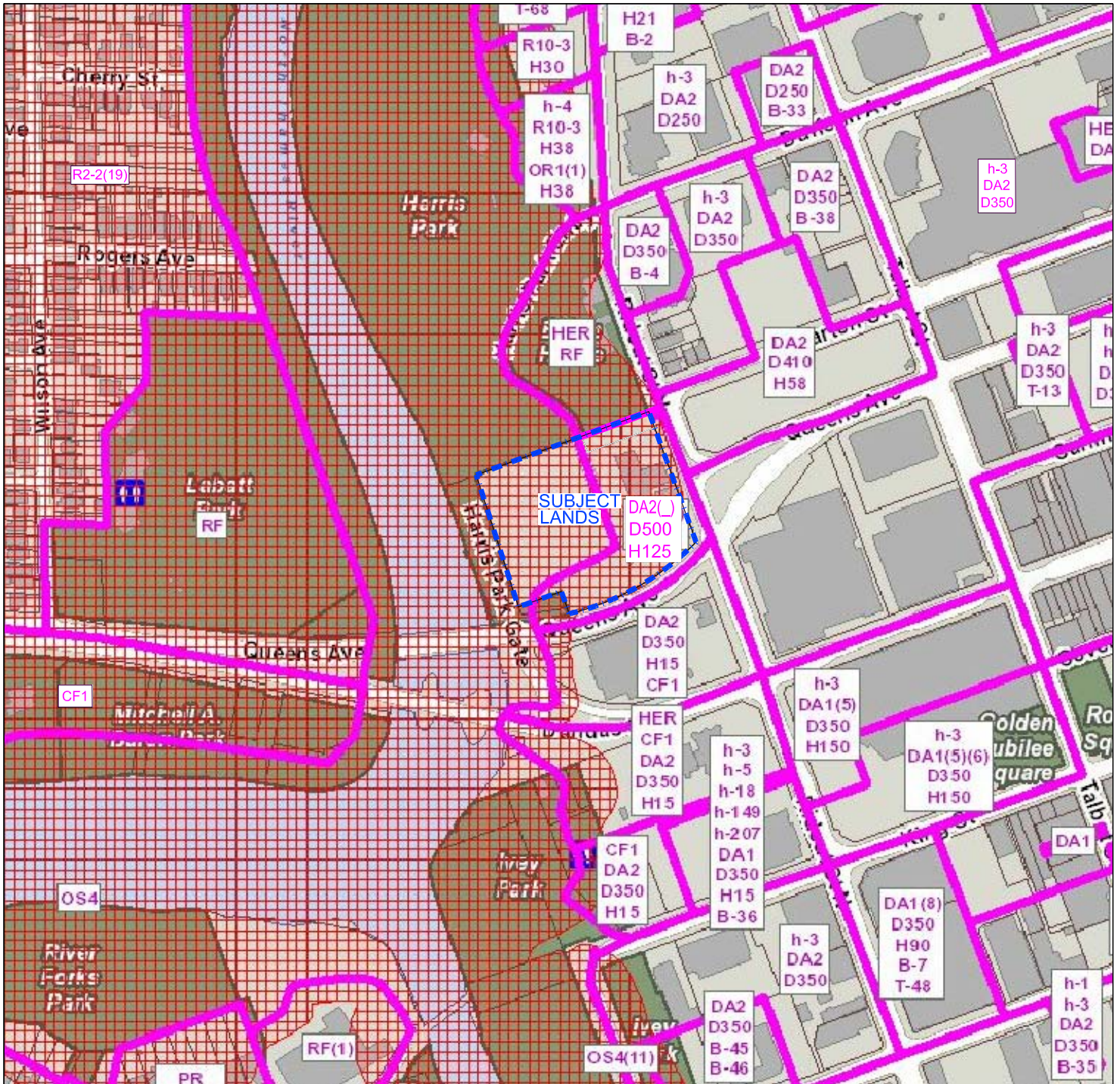
1. Apply a site-specific maximum height ('H') provision of 125 m to reflect the planned 40 storey high-rise apartment; and
2. Allow for a maximum residential density of 500 units/ha to permit the Site to be redeveloped for an intensive mixed-use form that will support the efficient use of existing infrastructure and public services.

Considering the building density permissions prescribed for the Downtown designation and the impending removal of bonusing permissions, in our opinion a site-specific DA2 Zone variation is the most appropriate zoning mechanism to implement the requested Specific Area policies and to accommodate the proposed development.

5.2.2 Site-Specific Zoning Provision

Figure 13 illustrates the **Downtown Area Special Provision (DA2(□)*D500*H125)) Zone** proposed to facilitate the various components of the proposed mixed-use, high-rise tower. Collectively, in our opinion, Sections 3.3, 4.2.10 and 4.3.5 of this Report identify urban design enhancements that support permissions for increased height and density for this project.

Alternatively, a 'Bonus (B) Zone' may be the most appropriate mechanism to implement the Specific Area policies proposed for the 1989 Official Plan and The London Plan. Further discussion with City staff may be required to confirm if a Bonus Zone should be applied to facilitate this project.

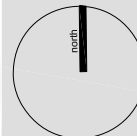


- ZONING LEGEND**
- ZONE LIMIT
 - R2 RESIDENTIAL R2 ZONE
 - DA DOWNTOWN AREA ZONE
 - OR OFFICE RESIDENTIAL ZONE
 - RF REGIONAL FACILITY ZONE
 - HER HERITAGE ZONE
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 - OS OPEN SPACE ZONE
 - h HOLDING PROVISION
 - H HEIGHT PROVISION

- PR PRIVATE ROAD PROVISION
- D DENSITY PROVISION
- B BONUSING PROVISION
- CONSERVATION AUTHORITY REGULATED AREAS

Figure 13
Proposed Zoning

SUBJECT LANDS



6.0

CONCLUSIONS

In conclusion, the requested amendments to the City's 1989 Official Plan, new Official Plan and Zoning By-law are appropriate for the Site, compatible with the existing development context and in keeping with the framework of planning policy. This assessment is based, in part, upon consideration of the following merits:

1. The subject lands are situated within the Central London planning area, form part of the City's downtown core, and are currently designated for both high density residential development and office/commercial uses;
2. The property is well suited for residential intensification given its physical size, its location within Downtown London and its proximity to prominent offices, retail/service commercial enterprises, government activities, recreational, entertainment and cultural facilities;
3. The Site is located within convenient walking distance of bus routes operating along the Talbot Street, Dundas Street, Richmond Street and Ridout Street North corridors (providing connectivity throughout the City and to regional transportation facilities). The City's proposed BRT system also includes routing along Queens Avenue in the vicinity of the subject lands;
4. The massing, orientation and articulation of the proposed mixed-use, high-rise tower are designed: to be compatible with surrounding land uses; sympathetic to existing heritage buildings, complementary to the local development context and supportive of the pedestrian environment along Ridout Street and Queens Avenue. Accordingly, in our opinion, this redevelopment project should not generate significant land use conflicts with adjacent properties;
5. The residential component of this project introduces greater housing choice within the downtown core to help broaden the range and mix of housing available to current and future residents of Central London, and to help the City accommodate forecasted housing demands and achieve residential intensification targets. In this regard, the proposal would also help to promote neighbourhood stability by diversifying the mix of housing available

in the downtown core to better meet the changing needs of local residents over the long-term;

6. Collectively, the mix of higher density residential and office/commercial uses associated with this project would support efforts to revitalize the downtown core and encourage its continued development as a multi-functional regional centre;
7. This residential development proposal is consistent with the Provincial Policy Statement;
8. This intensification project: is in keeping with the applicable goals, objectives, policies and guidelines of the 1989 Official Plan, The London Plan, Our Move Forward and the Downtown Heritage Conservation District Plan;
9. The proposed site-specific zoning structure would appropriately implement the intended building design and site layout; and
10. The development represents good planning.

Given the noted considerations, it is recommended that the City of London approve the Official Plan Amendment and Zoning By-law Amendment applications, as proposed.

Respectfully submitted,

MHBC



Scott Allen, MA, RPP
Partner



Eric Miles, MPL
Planner

APPENDIX A

ARCHITECTURAL RENDERINGS

FARHI HOLDINGS - 451 RIDOUT STREET



EAST FACADE ARIAL VIEW

FARHI HOLDINGS - 451 RIDOUT STREET



NORTHEAST CORNER ARIAL VIEW

FARHI HOLDINGS - 451 RIDOUT STREET



WEST FACADE ARIAL VIEW (PARK)

FARHI HOLDINGS - 451 RIDOUT STREET



QUEENS AVENUE VIEW (EAST FACADE)

FARHI HOLDINGS - 451 RIDOUT STREET

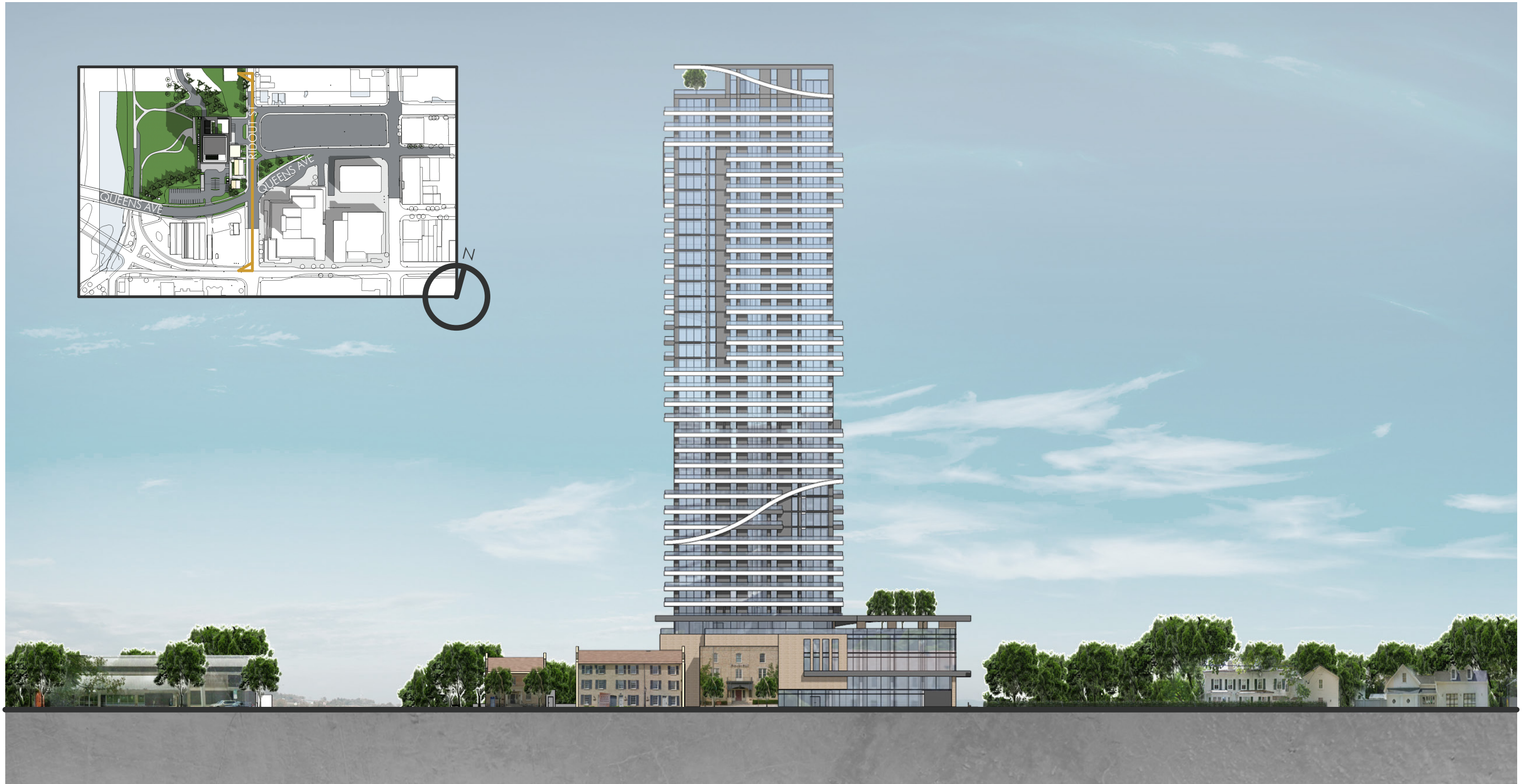


QUEENS AVE VIEW (BRIDGE CROSSING)

APPENDIX B

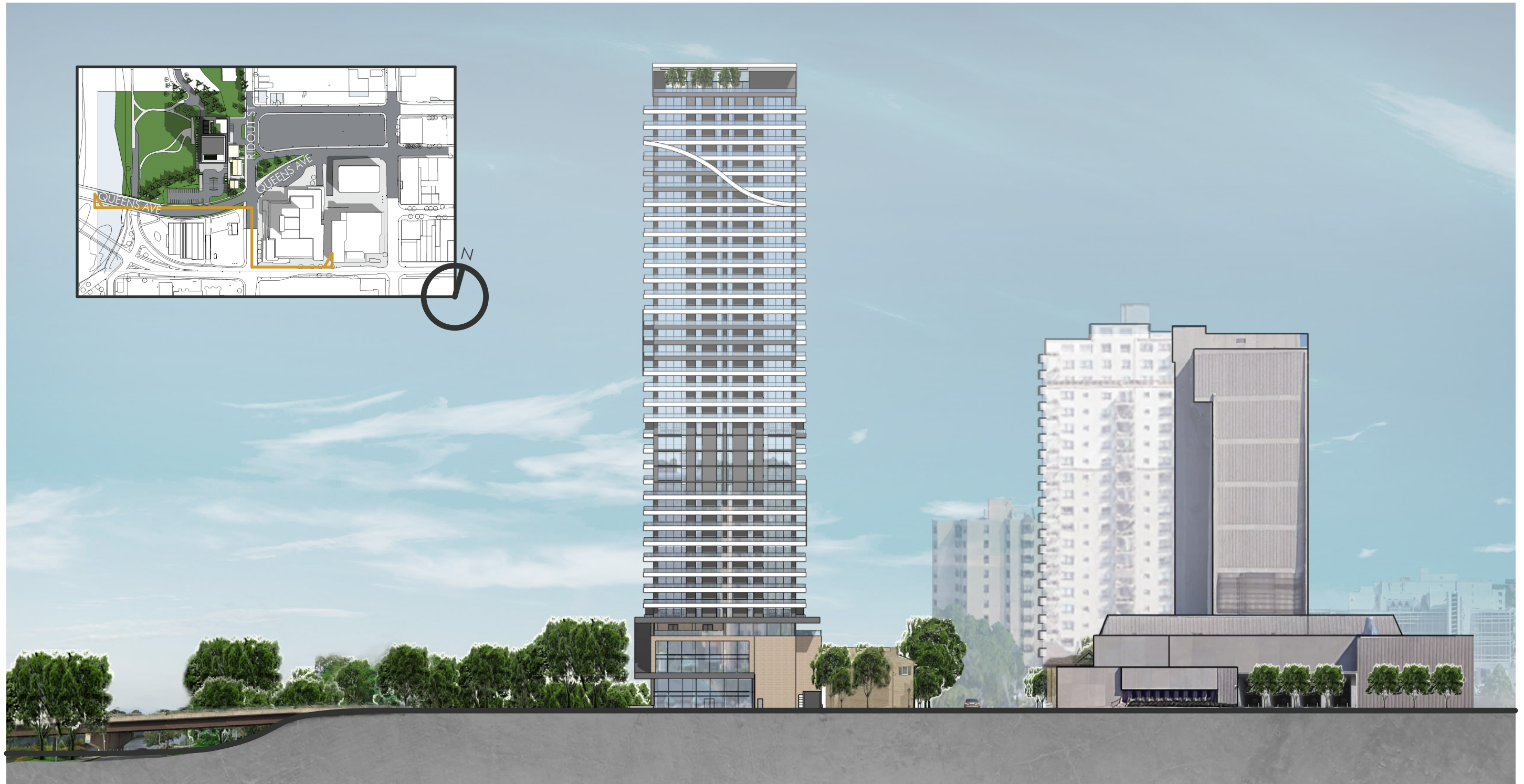
CONCEPTUAL BUILDING ELEVATIONS/SECTION DRAWINGS

FARHI HOLDINGS - 451 RIDOUT STREET



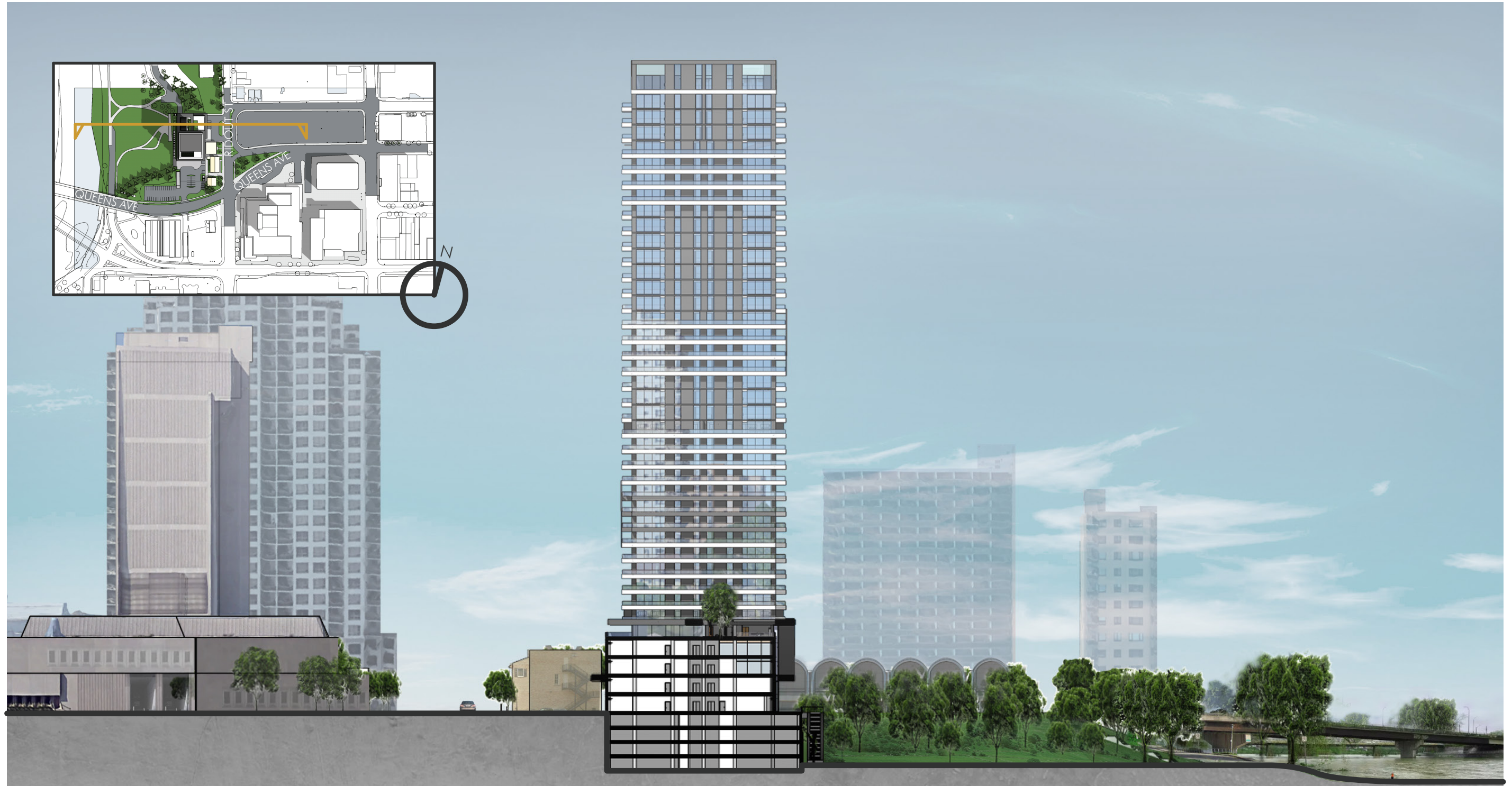
RIDOUT STREETSCAPE (EAST ELEVATION)

FARHI HOLDINGS - 451 RIDOUT STREET



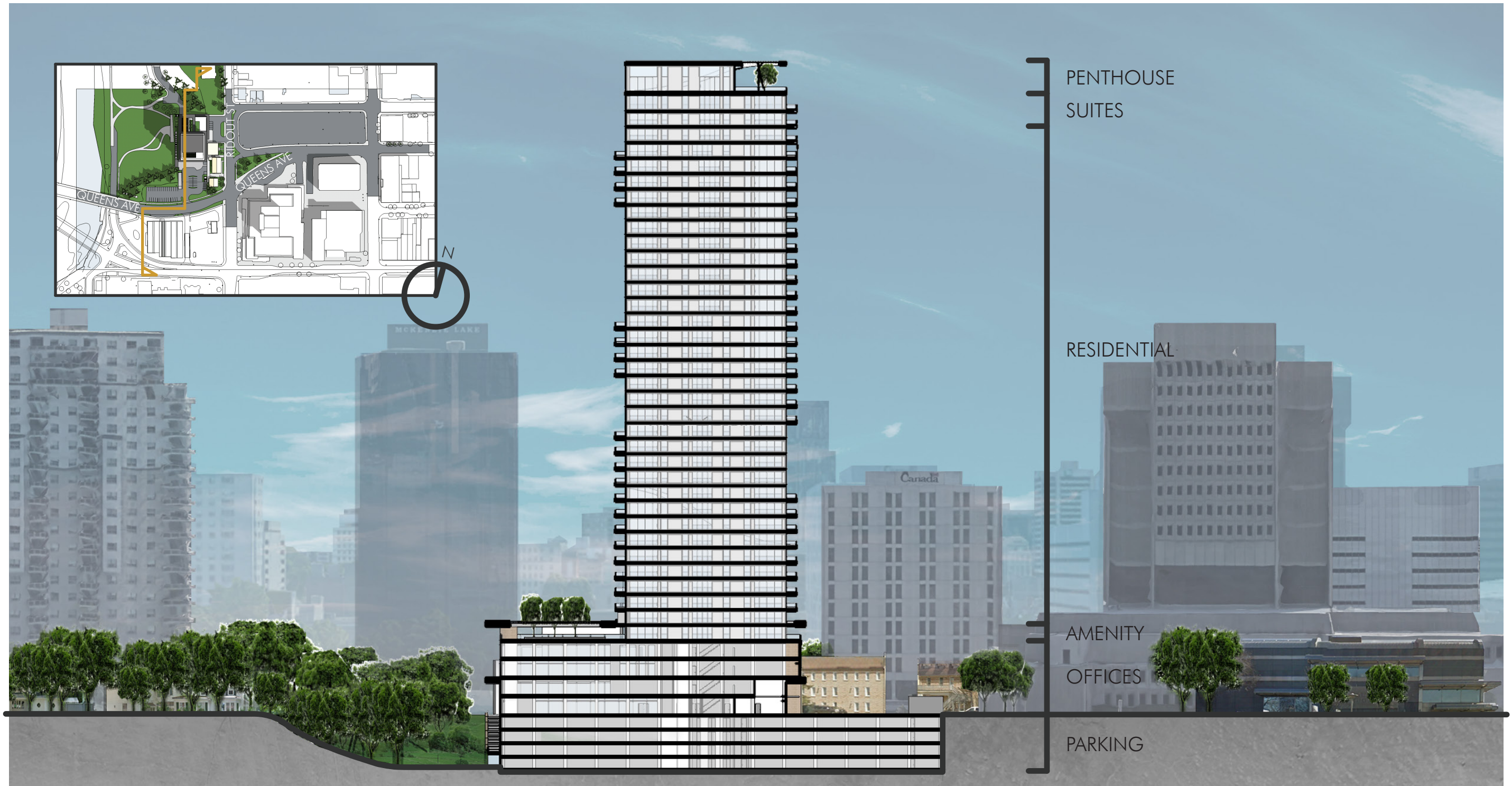
QUEENS AVE. STREETSCAPE (SOUTH ELEVATION)

FARHI HOLDINGS - 451 RIDOUT STREET



EAST TO WEST CONTEXTUAL SECTION

FARHI HOLDINGS - 451 RIDOUT STREET



NORTH TO SOUTH CONTEXTUAL SECTION

FARHI HOLDINGS - 451 RIDOUT STREET



SOUTH ELEVATION (PODIUM)

FARHI HOLDINGS - 451 RIDOUT STREET



WEST ELEVATION (PODIUM)

FARHI HOLDINGS - 451 RIDOUT STREET



NORTH ELEVATION (PODIUM)

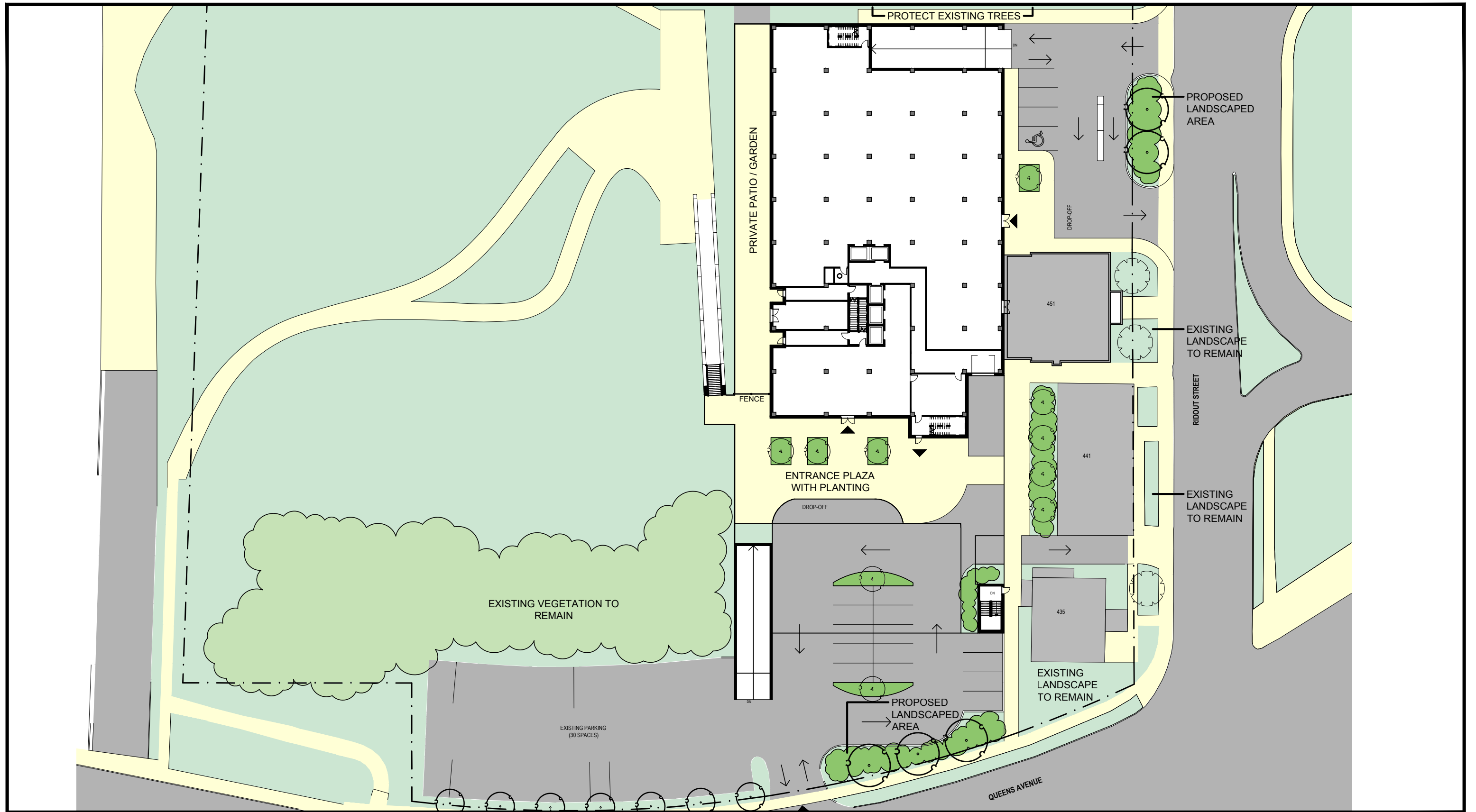
FARHI HOLDINGS - 451 RIDOUT STREET



EAST ELEVATION (PODIUM)

APPENDIX C

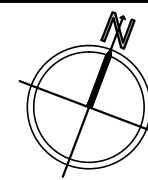
CONCEPTUAL LANDSCAPE PLAN



TITLE:

FARHI HOLDINGS

435 RIDOUT STREET, LONDON, ON



PROJECT NUMBER:
19-203 (Lb)

SCALE:
1:500

DRAWN BY: RKLA Inc.

DATE: JULY 22, 2019

DRAWING NUMBER:

CONCEPT 1

APPENDIX D

SUN STUDY

FARHI HOLDINGS - 451 RIDOUT STREET



SUN STUDY (MARCH 21ST)

FARHI HOLDINGS - 451 RIDOUT STREET



SUN STUDY (JUNE 21ST)

FARHI HOLDINGS - 451 RIDOUT STREET



SUN STUDY (SEPTEMBER 2ND)

FARHI HOLDINGS - 451 RIDOUT STREET



SUN STUDY (DECEMBER 21ST)

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