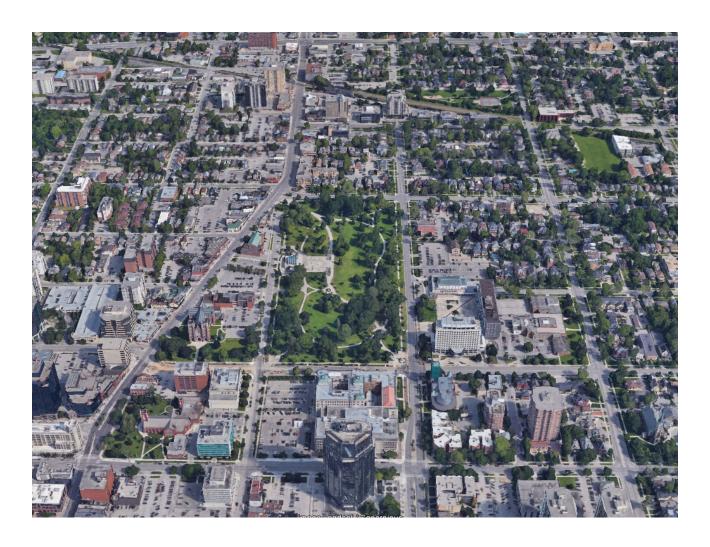






Purpose of this Examination

560 Wellington Holdings retained GSP Group to review and assess the Victoria Park Secondary Plan in London as it concerns its site at 560 and 562 Wellington Street. Further to its involvement in all the Secondary Plan's engagement and consultation sessions, 560 Wellington Holdings identified deficiencies in the Secondary Plan process related to the review of the policy framework, neighbouring context and development alternatives. This Examination provides additional consideration and points of needed analysis for the Victoria Park context to that put forward as part of the Victoria Park Secondary Plan.



Reason and Need for the Secondary Plan

The need for the process that has resulted in the Victoria Park Secondary Plan specifically arose in response to proposed applications for an Official Plan and Zoning By-law Amendment for the site at 560 and 562 Wellington Street. These applications were submitted in December 2014 to amend the 1989 City of London Official Plan and Zoning By-law Z.1 to allow the redevelopment of the site for a new residential building with ground floor commercial uses. Further to public meetings and Planning Committee review, the proposed applications were refined and the applications were re-submitted in December 2016 and explored further with City Staff.

Subsequent to proposed refinements to the development and applications, the Planning and Environment Committee at its May 8, 2018 meeting directed that the "review of the existing plans, policies, and guidelines applying to the properties surrounding Victoria Park and to consider a comprehensive plan for the properties surrounding the Park" [emphasis added]. Such a review was a fundamental component of the May 2018 scope of the Secondary Plan process, made necessary by the overlapping policy and guideline context applicable to the area and the varied character of the area's urban fabric.

Analysis is a core element of the definition of a "review"; however, such analysis is not apparent in the Secondary Plan process. Particularly concerning to 560 Wellington Holdings is the extent and thoroughness of the analysis of the contextual situation and the leap from principles to establishing intensity and built form policies that occurred in the Secondary Plan process.

Core Question of the Secondary Plan

Intensification is the root of issue for the Secondary Plan. Council's direction for the process concerns determining the most appropriate form of redevelopment and intensification within this portion of Central London. Such a determination requires a complete analysis of the context, characteristics and attributes that comprise the local neighbourhood surrounding Victoria Park. This analysis should have included a progression that answers the following probing questions to determine the appropriate levels and scales of intensification for the Victoria Park precinct:

- 1. What are the locational attributes and characteristics of Central London that influence the determination of intensification?
- 2. How does the evolution of the Victoria Park precinct inform the determination of intensification?
- 3. What are the land use and built form characteristics surrounding Victoria Park that influence the determination of intensification?
- 4. What are the land use policy directions that influence the determination of intensification?
- 5. What is an appropriate vision and principles for redevelopment and intensification surrounding Victoria Park resulting from the above considerations?
- 6. Based on the above vision and principles, what are appropriate "tests" for determining specific heights and scales of intensification surrounding Victoria Park concerning impacts and sensitivities?

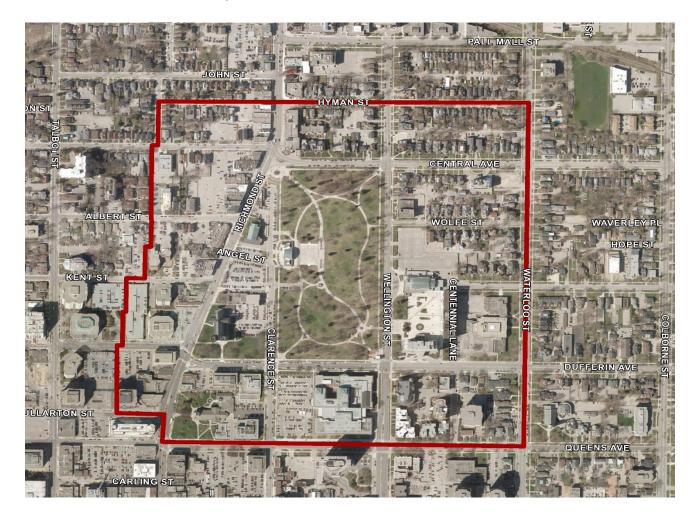
An Appropriate Study Boundary for Analysis Purposes

The Victoria Park precinct is more than just the properties that immediately face Victoria Park; it is comprised of an interwoven pattern of uses, forms and characteristics by multiple neighbourhoods. The Secondary Plan's reliance on this immediately facing interface does not express a fulsome precinct character, recognizing that the background consultations did outline planning characteristics of the broader area on a cursory level, as provided by the secondary plan's consultant.

Although Section 1.2 of the Secondary Plan does indicate the broader context "was considered in the preparation of the Secondary Plan", it is not apparent how this consideration was incorporated. At a minimum, a one block depth in all direction

from Victoria Park provides a truer sense of the interwoven and overlapping characteristics of different areas coming together in this location, and particularly how this informs analysis and determination of appropriate locations and scales of intensification.

Determination of the study area's character is a critical piece of the Secondary Plan process. Explored further below, the precinct surrounding Victoria Park is distinct in London given its position at the seams of several land use and built form patterns. This is particularly true for the Wellington Street corridor on the east side of Victoria Park which is more transitional in nature and has evolved differently from the residential portions of the Woodfield neighbourhood further to the east.



1. What are the influencing Central London locational attributes?

Analysis Required

The Victoria Park precinct sits prominently in London's city structure with the core of "Central London". Central London is a broad planning district that captures several neighbourhoods and city elements, including Downtown London, the Woodfield neighbourhood, Victoria Park, and various Intensification corridors. Understanding the broader context of the precinct's position with this "big picture" is critical for a Secondary Plan that successfully reflects the varied and evolved character of this higher order district. Developing this understanding requires a fulsome analysis of the locational attributes within Central London that prominently place the district in the city's broader structure.

This analysis needs to consider:

- The overall transit system and higher frequency transit routes.
- The mix, form and intensity of residential uses.
- The mix, scale and distribution of employment and office functions.
- The mix and scale of retail and commercial corridors and clusters.
- The distribution of community and institutional and public uses, both locally-based and regionally-serving.
- The transportation system and the location of higher order roads.
- The parks and open space system and Victoria Park's place in that system.

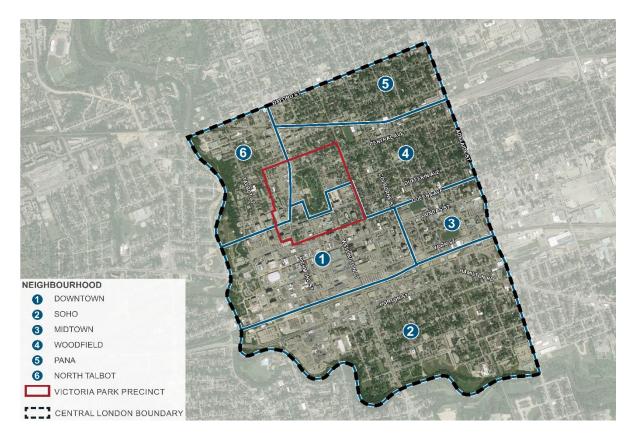


The precinct sits at the seam of multiple neighbourhoods within Central London. The eastern portion is in the Woodfield neighbourhood, the southern portion is in Downtown and the western portion is in the North Talbot neighbourhood. Each has a different composition of land uses, development intensity, built form patterns and heritage attributes. These all factor into the analysis of the precinct and the derivation of appropriate new development forms.

The Wellington Street corridor forming the eastern interface of Victoria Park is distinguished from the remainder of the Woodfield neighbourhood to the east. Between Central Avenue and Dufferin Avenue, this corridor is characterized by a combination of institutional uses, underutilized properties, non-residential conversions, and surface parking areas. This is distinct from the low-rise residential fabric associated with much of Woodfield. While the corridor sits within the West

Woodfield, it is at periphery rather than internalized from a built form and evolution perspective.

Central London is varied, and not homogenous, in terms of land use and housing character. Central London has a mixture of land uses, dwelling forms and housing tenure, rather than a homogenous area comprised of detached dwellings. The land use patterns include a full continuum of residential, commercial, community and institutional uses with its boundaries. The City's "Central London Neighbourhood Profile (1996-2016)" sheds some light on population, housing type and composition within Central London. The 2016 population of 11,345 in Central London continued the general decline in Central London since 1996. Smaller 2person family sizes account for 75% of the Central London population. Apartment greater than 5 storeys in height represent 38% of the housing stock in Central London while those 5 storeys or less represent 34%. Rental tenure accounts for 78% of the housing stock in Central London.

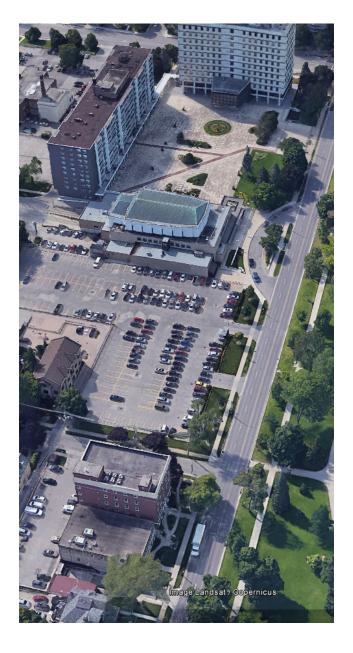


2. How does the evolution of the Victoria Park precinct inform?

Analysis Required

The evolution of city core areas and the elements that signal this transition is an important contributor to the analysis for the Secondary Plan. The acknowledgement of these transitional attributes can, and should, successfully direct proposed and informed land uses for such areas. Analysis of the evolution or change will also inform regarding the sensitivities where transitions of scale and intensity for an area are potential concerns. The relevant attributes and characteristics that need to be assessed and considered prior to the allocation of intensification include:

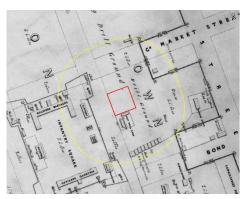
- The stability of an area concerning built form and land use patterns.
- The conversion of existing detached dwellings to commercial and office uses.
- The conversion of existing detached dwellings to multiple residential uses.
- The extent of existing surface parking lots and the creation of new lots.
- The extent and nature of redevelopment to other uses.
- The nature of higher order streets.



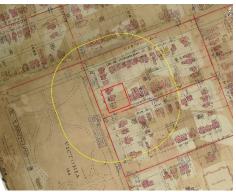
From a built form character perspective, the Victoria Park Precinct has evolved over the last 150 years. The roots of Victoria Park and the immediate surrounding area are military in nature, owing to the former garrison occupying what is today Victoria Park and its surrounding neighbourhood. With Victoria Park's dedication in the 1870s came the establishment of the neighbourhood's residential fabric. The fabric of the Precinct, however, has evolved subsequent to the rest of the "Woodfield" area and is distinct from that fabric.

While many of the original detached dwellings constructed in the late nineteenth century throughout the Woodfield Neighbourhood remain intact, the original fabric along Wellington Street north of Dufferin facing the park's east side was removed in the 1960s and 1970s with the construction of City Hall, Centennial Hall, surface parking lots and new office buildings (which includes 560-562 Wellington Street). Along the Wellington Street corridor, and in fact throughout the district more widely, the mid to late-20th century brought a transition to commercial use. Large homes in this corridor were adapted into commercial or multiple residential uses while others were removed to make way for purpose-built commercial buildings in some instances.

The Wellington Street corridor forms the eastern interface of Victoria Park is distinguished from the remainder of the neighbourhood. Between Central Avenue and Dufferin Avenue, this corridor is characterized largely by a combination of institutional uses, underutilized properties, non-residential conversions, and surface parking areas. This is distinct from the low-rise residential fabric associated with much of Woodfield. In this sense, while the corridor sits within the West Woodfield it is at periphery, rather than internalized, from a built form and evolution perspective.







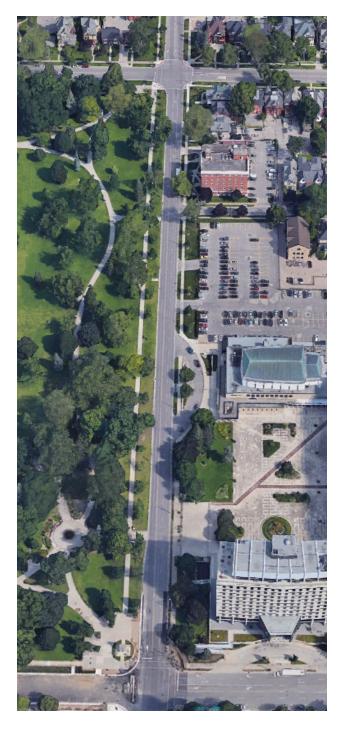


3. What are the influencing patterns and characteristics in the surrounding area?

Analysis Required

Moving to a finer level of detail from the broader locational attributes of Central London, the characteristics of the area immediately surrounding Victoria Park specifically influence the allocation of intensification. Three aspects of the contextual patterns and characteristics in the Victoria Park precinct should influence the analysis, which needs to be undertaken for a focused area that is larger than simply the immediately facing properties for a true sense of the area's character and evolution. These characteristics need to be assessed and considered prior to the allocation of intensification to fully understand:

- The characteristics of Victoria Park itself and how they influence consideration of further intensification, including its current functions and activities, the intended role and function moving forward and appropriate supporting forms and land uses.
- The characteristics of the precinct's land use pattern and how they influence consideration of further intensification, including the mix of different residential, office, retail, community, institutional and parks and open spaces, as well as the nature of conversions in the area.
- The characteristics of the precinct's evolution and how they influence consideration of further intensification, including building heights and their distribution, the heritage fabric and character, street and streetscape patterns and the evolution of the built fabric (particularly along Wellington Street).



The Park

Victoria Park is the city-wide park at the precinct's heart. It has served as a focal point and central meeting place for London residents and visitors since the 1870s. Considered to be one of London's most important designed landscapes of the 19th century, Victoria Park is a unique and defining feature of Central London, and was specifically designed for the festivals, special events and ongoing celebrations (New Years, Christmas, skating, civic gathering place). It is designated under Ontario Heritage Act as a significant heritage landscape, owing to its significance of archaeology, military history roots, landscape design, public gathering Place and monuments. The nature and function of Victoria Park has evolved over time with the replacement of park elements, changes to the surrounding residential fabric, and changes in the recreational and civic offerings in park.

Victoria Park is a type of park space that is proven to benefit from more intense forms of supporting developments that assist with further animating the space throughout all times of the day and the year. The inclusion of several North American urban parks in the public session materials were particularly useful given they provide for a strong understanding of the relationship to London's Victoria Park. The imagery of these other urban parks demonstrates that vibrant, inviting, active and

people-friendly spaces can be accommodated with intensity and taller buildings at its edges. This conclusion is supported by the commentary in Appendix B of the Secondary Plan:

"The case studies demonstrate that tall buildings do not necessarily compromise the experience of the park, but instead, shows that they can add to the vibrancy and the character of the place with proper design treatments to mitigate potential negative impacts to the pedestrian environment."

The graphical comparison of the park sizes showing London's Victoria Park (180 metres wide by 380 metres long) as upwards of twice the size of the other five urban parks. This reassures that more intense and taller buildings can work without impacting the function of this central park space. London's Victoria Park is substantially larger than these parks, all which still work as vibrant open spaces with taller surrounding buildings despite their smaller sizes. While there have been concerns related to the "destruction" of the Victoria Park heritage, higher intensity development and redevelopment surrounding the Park would support the use and appreciation of the characterdefining elements that comprise the heritage value of Victoria Park. The precedents demonstrate high quality urban spaces supported by building forms and heights that fit their prominent locations and contexts.



Land Use Patterns

The precinct is truly mixed-use in nature with a varied built form composition. The precinct exhibits a more traditional commercial main street in the western portion, a more intact residential pattern in parts of the eastern portion (with numerous building conversions), and an interjection of larger commercial and institutional buildings throughout. Six areas each exhibit a different composition of land uses and forms, as outlined below. The precinct's locational attributes and these land use patterns will continue to influence its evolution.

On the east side of Victoria Park, conversions of detached dwellings to multi-residential uses and office uses as well as the Wellington Street's corridor evolution to purpose-built office, institutional and entertainment uses (and surface parking lots) is the prevailing pattern. This

distinguishes the Wellington street corridor from the rest of Woodfield to the east and, which should be viewed as an opportunity to fulfill the policies for intensification of Central London, particularly at its core in this instance.

Several land use characteristics establish the transitional attributes of the precinct, including:

- A mixed-use land use pattern with comparable proportions of residential and non-residential uses.
- A transition from a previous single detached residential character through conversions to commercial or multiple residential uses or demolition and redevelopment.
- Numerous surface parking lots or larger undeveloped parcels throughout different areas that are not optimal uses of land in this context.



Area A

Area A contains the blocks forming the Richmond Street corridor. The west side of Richmond Street is characteristic of the corridor's length with streetfacing commercial uses including a range of shops, restaurants and service uses. There are several multi-storey buildings with commercial residential space above. Away from the Richmond Street frontage, additional commercial uses (purpose-built or residential conversions), surface parking lots, and taller apartment buildings. The property at the northwest corner of Richmond Street and Dufferin Street has a high-rise mixeduse building currently being constructed facing St. Peter's Cathedral Basilica.

On the east side of Richmond Street, the triangle bounded by Richmond, Dufferin and Clarence and bisected by Angel Street is a combination of institutional and commercial uses.

South of Dufferin Avenue, St. Paul's Cathedral sits at the corner of Queens Avenue and Richmond Street with the remainder of the block containing low and mid-rise commercial uses (retail and office)

and surface parking. Between Dufferin Street and Angel Street, St. Peter's Cathedral Basilica sits prominently at the corner of Dufferin and Richmond with the former St. Peter's School to the north containing a mixture of educational and institutional uses and the remainder of the block containing surface parking lots. First Baptist Church and a restaurant (Williams Café) sits to the north of Angel Street.





Area B

Area B contains the block immediately to south of Victoria Park, on south side of Dufferin between Clarence and Wellington. The London Life office building occupies the eastern two-thirds of the block with a surface parking lot on the western third.



Area D

Area D contains the two blocks on a portion of east side of Victoria Park, bounded by Dufferin, Wellington, Waterloo and Princess, and bisected by Centennial Avenue. City Hall sits at the corner of Wellington and Dufferin. Centennial House, a high-rise apartment building facing onto Reginald Cooper Square, and Centennial Hall sit to the north of City Hall. London Central Secondary School sits to the east of Centennial Avenue.



Area C

Area C contains the two blocks to the southeast of Victoria Park on south side of Dufferin between Wellington and Waterloo. These two smaller blocks are divided by Picton Street. West of Picton Street, the block contains Metropolitan United Church and several mid-rise and high-rise apartment buildings. East of Picton Street, the block contains a high-rise apartment building, numerous office and personal service uses within converted residential buildings, and surface parking.







Area E

Area E contains three blocks to the east and northeast of Victoria Park, between Wellington and Waterloo north of Princess. Within the exception of the Wellington Street corridor, these three blocks are characterized by detached dwellings that have been converted to allow for ground floor office use with residential units above or converted to multiple residential uses. The rear yards within the blocks to south of Central Avenue have been predominately paved to allow for on-site parking, and, as a result, there is a limited amount of amenity or green space in the rear yards. There is mid-rise apartment building on Central Avenue, beside which a site approved for mid-rise apartment building at the southwest corner of Waterloo Street and Central Avenue

The land use pattern on the properties along Wellington Street are distinct from the remainder of the blocks. Office uses within converted residential buildings and purpose-built office buildings at the southeast corner of Wolfe Street and Wellington Street exist north of Wolfe Street. A surface parking lot sits at the southeast corner of Wolfe Street and Wellington Street, which is approved for a high-rise apartment building with ground floor commercial uses.



Area F

Area F contains the block immediately to north of Victoria Park, on the north side of Central between Richmond and Wellington. There is a mid-rise mixed-use building along the block's Richmond Road frontage with ground floor retail and restaurants with residential units above. Office and multiple residential units within converted detached dwellings, several existing detached dwellings and a surface parking area in the block's centre.







Wellington Street Evolution

Over time, the area's fabric has evolved, most pronounced on Wellington Street corridor spanning Dufferin Street to Central Avenue. In this corridor, the mid- to late-20th century brought a transition to commercial use with certain large homes in this corridor adapted into commercial buildings and others removed to make way for purpose built commercial properties as was the case on the subject site. Residences on Wellington were removed to make way for public buildings including Centennial Hall and City Hall. In addition, land was cleared and used for surface parking lots resulting in a loss of the connection to the area's historic character and a deviation from the character of most of the District.

Wellington Street as a corridor is distinguished from the rest of Woodfield neighbourhood in that it largely does not represent Woodfield's original fabric. The corridor evolved from its original roots based on military purposes in the 19th century, to residential purposes in the first half of the 20th century, and onto civic, higher rise residential, and office purposes in the last half of the 20th century. This distinction is the heart of the matter for the Victoria Park Secondary Plan in terms of the appropriate form and intensity of development along this unique contextual situation. It presents significant opportunities for continued accelerated transformation in the interest of intensification and optimal use of land and resources in such a prominent location.



4. What are the influencing Land Use Policy directions?

Analysis Required

More thorough study of the applicable plans, policies and guidelines is the core purpose of the Secondary Plan process as directed by Council in 2018. The May 2018 staff report on the terms of reference for the study indicates as such:

"Given that the planning regime for the properties surrounding the Park is varied and lacks a cohesive vision, further study of the policy framework and the context of the lands surrounding Victoria Park will determine whether there is a need to develop a comprehensive policy, design guideline, and plan to knit together these lands following a public participation process."

With this intent, there are three veins of analysis required to properly inform a determination of an appropriate level of intensification surrounding Victoria Park:

- 1. What is the broad city-building policy direction of the Provincial Policy Statement (PPS), including policies related to growth management and intensification, transitsupportive land use patterns and development forms, support for downtowns and main streets, and housing options and diversity?
- How is this provincial direction reflected in the City's Official Plan framework concerning the above broad matters of city-building?
- 3. What is the policy direction and guideline basis informing the determination of appropriate scale, height and intensity of intensification and how does to balance with the above broad policy objectives?

Our Examination

On the **first question**, the PPS provides the provincial direction related to land use planning throughout the province. All municipal planning decisions must be "consistent with" the PPS. The current PPS, the 2014 PPS, established an inward-looking growth emphasis that calls for:

- Efficient development patterns that effectively use existing infrastructure and facilities;
- Public transit and active transportation as the first options for land use patterns;
- Mixed land use patterns and densities that are transit-supportive;
- Diversity in opportunities for intensification and redevelopment; and
- Diversity in housing options and choice.

The 2014 PPS preamble specifically states that efficient development patterns "optimize the use of land, resources and public investment in infrastructure and public service facilities". So, for the purposes of the Secondary Plan the PPS objective is more than simply "allowing" or "encouraging" intensification; rather it is a direction for making "the best or most effective use of" land, public facilities and services and transit infrastructure.

On the **second question**, land use planning in London is directed, in part, by both the existing 1989 Official Plan and the 2016 London Plan. The former is dated; the latter is currently under appeal as it concerns larger matters of intensification, growth and specific land use policies concerning height and intensity.

At the broader city-building level, residential intensification is a fundamental principle of the 2016 London Plan. One of its strategic direction (*Direction #5: Build a mixed-use compact city*) is based on a strategy of "compact, contiguous"

pattern of growth" and a city structure plan that "focuses high-intensity, mixed-use development to strategic locations" with transit focal point. Numerous city structure policies support this direction:

- Policy 79: London will grow "inward and upward" in a compact urban fashion with a greater emphasis on growing within its built-up area.
- Policy 83: intensification will be allowed in appropriate locations in forms that are "sensitive to existing neighbourhoods and represents a good fit";
- Policy 90: the Primary Transit Area will be a focus for residential intensification and transit investment, the former which "will be directed to appropriate place types and locations within the Primary Transit Area and will be developed to be sensitive to, and a good fit within, existing neighbourhoods".
- Policy 92: Central London will facilitate infill and intensification and may accommodate greater heights and densities than in other neighbourhoods.
- Policy 97: the Rapid Transit Corridors will "provide positive opportunities for mid-rise and high-rise development at appropriate locations".
- Policy 154: urban regeneration efforts will encourage "the economic revitalization and enhance the business attraction of urban main streets" and strengthen the core "by nurturing the development of Downtown and the urban neighbourhoods that surround it"
- Policy 154_8: intensification will be facilitated within urban neighbourhoods where it is appropriate and its form fits well.

On the **third question**, with the city-building direction established, the analysis should progress to the more specific policies and guidelines that inform the determination of appropriate heights and scales for intensification in the precinct. This requires reconciling the direction for intensification and "inward and upward" growth at such prominent locations having supporting locational attributes with aspects of design, compatibility and heritage conservation. Three aspects to this reconciliation are particularly important:

- 1. The consistency of the relevant Official Plan land use designations and policies with the PPS (and conformity with the broader Official Plan city structure policies) concerning optimal land use and development patterns when one considers the precinct's locational attributes, the transitional nature of the land use and built form characteristics along the Wellington Street corridor, and the necessary recognition of existing Zoning By-law permissions along the Wellington Street corridor.
- 2. The applicability of the West Woodfield Heritage Conservation District Plan (HCD Plan) to the Wellington Street corridor when one considers its distinguished transitional nature, existing zoning permissions and the unrefined direction for the "City Hall Precinct" advanced in the HCD Plan.
- The relevance of the West Woodfield HCD Plan guidelines to the Wellington Street corridor when one considers they are relatively quiet on guidance concerning taller building forms within the district.

5. What is an appropriate resulting Vision and Principles for the Victoria Park precinct?

Analysis Required

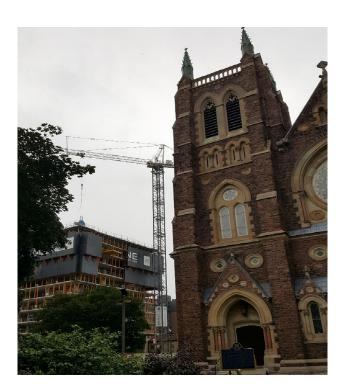
A vision for a Secondary Plan sets the big picture aspirations for the study area's development and evolution over time. The Secondary Plan's Vision statement sets the high-level direction for its principles and policies; the Principles provide guidance in manageable bits as to how the above general Vision will be achieved, providing the basis for the framework of policies and implementing tools that comprise the Secondary Plan.

The findings of the analysis above need to input into the formulation of the vision and principles for the precinct. As currently written, however, the Vision does not recognize the precinct's prominence, location attributes and evolution noted in the above analysis considerations. Refinements to this Vision should further emphasis the prominent of location and goal for a more vibrant area. Likewise, the proposed Principles are, in instances, unclear and do not fully reflect the prominence and hierarchy of the precinct and importance of intensification.



Based on the preceding analysis, the proposed Vision should read:

"The Victoria Park area is a prominent destination that is cherished by Londoners. The area will develop in a way that balances the desire to grow inward and upward with the need to conserve significant cultural heritage resources, be compatible with the surrounding context, and foster Victoria Park's continued use as a city-wide destination for recreation, relaxation and events. Future development of the area will celebrate the prominence of Victoria Park through design excellence and sympathetic development, adding further surrounding activity and vibrancy to contributeing to the continued success of this area as a destination for Londoners both now and in the future."



Based on the preceding analysis and embracing the above refined Vision, the proposed Principles should read:

- Embrace Identify opportunities for compatible and sensitive intensification
- Design buildings <u>with quality architectural</u> <u>touches</u> to celebrate the prominence of Victoria Park as a city-wide gem
- <u>Design new buildings to respect and complement</u>
 <u>Enhance and conserve</u> cultural heritage resources within and surrounding Victoria Park
- Respond to climate change by encouraging sustainable development, building design, and active transportation options
- Frame Victoria Park with a <u>lower-rise</u> an appropriately-scaled base that creates a comfortable pedestrian environment
- Ensure compatibility of new buildings with Protect the residential amenity of the Woodfield Neighbourhood through impact assessment and mitigating designs by mitigating impacts of new development
- Support and animate Victoria Park with active uses on the ground floor of facing buildings
- Preserve and strengthen <u>public</u> visual connections to Victoria Park and create new <u>public</u> view corridors where possible
- Continue to enhance the amenity of Victoria Park as a neighbourhood green space, as well as a destination for all Londoners to attend festivals and events
- Improve and create new connections to Victoria Park
- Preserve and enhance <u>existing or establish</u> <u>new</u> landscaped edges around Victoria Park

5. What are the "tests" for analyzing sensitivities for appropriate development forms?

Analysis Required

The above contextual and policy analysis demonstrate that the Victoria Park precinct is an appropriate location for intensification. Sitting at the heart of Central London and on the doorstep of Downtown, the precinct capitalizes on numerous commercial uses, employment opportunities, a prominent park, higher order roads, higher frequency transit, and surrounding community and facilities. While locationally amenities appropriate, matters of compatibility and fit remain important considerations for the appropriateness more intense, taller development forms.

characterization and evolution of the The Wellington Street corridor, and its continued transformation, is separate and distinct from "Woodfield". This corridor is distinguished from Woodfield's broader residential character and the land use influences of adjacent lands inform a higher order and class of land use. It is key to understand this transitional character and the pressures on such an area immediately close to the evolution its transitional This and characteristics reduce sensitivities to increased intensification and divergent housing forms.

Deriving an appropriate scale for integrating taller, more intense buildings in the precinct relies on "tests" of sensitivities. The principal question of the analysis should be how to accommodate intensification and redevelopment in keeping with the broad policy direction while ensuring development massing, height and architectural character fits with its context.

Our Examination

Based on our experience and understanding of the Victoria Park context, analysis of these sensitivities should establish more objective considerations for determining appropriate heights, scales and forms on specific properties. This determination should be founded on an analysis and evaluation of a multitude of inputs considering fit, such as:

- The relationship to the neighbourhood and an understanding its character and the transitional characteristics.
- The relationship to the street and infrastructure and an understanding of the adjacent land uses and its existing and planned built form.
- The order of surrounding roads and their ability to accommodates intensification.
- The fit of new buildings with the streetscape in terms of the building base's scale and architecture.
- The maintenance and enhancement of existing public views at the pedestrian level.
- The objective evaluation of impacts common with taller building forms, including shadow, wind, privacy and overlook, and sky view impacts.
- The respect for heritage character and heritage guidelines as they can be applied and incorporated for taller building forms.