



October 28, 2021

File No: 11054

Planning and Environment Committee
City of London
300 Dufferin Avenue
P.O. Box 5035
London, ON
N6A 4L9

**Re: 560 and 562 Wellington Street
Official Plan and Zoning By-Law Amendment Applications (OZ-8462)
Planning and Environment Committee (PEC) – November 1, 2021**

To the PEC Chair and PEC members:

GSP Group is the planning consultant for 560 Wellington Holdings Inc. (the “**Owner**”) regarding its property at 560 and 562 Wellington Street in London (the “**Subject Property**”). GSP Group has been involved in the planning approvals for the Subject Property since 2012 for the original Official Plan Amendment and Zoning By-law Amendment application, which were originally submitted in 2014. In April 2021, GSP Group submitted a revised 17-storey development plan and revised Official Plan Amendment and Zoning By-law Amendment details on behalf of the Owner to be brought forward to a Planning and Environment Committee for a decision.

We are submitting this letter on behalf of the Owner for the Planning and Environment Committee’s consideration of the revised applications. It is meant as a summary of the key points of the rationale and justification for the proposed applications that implement the 17-storey development plan for the Subject Property. Our full analysis and justification is outlined in our April 14, 2021 Planning Justification Brief, which is meant to be read in conjunction with the full Planning Justification Reports submitted in 2014 and 2016.

The following presents the key messages for the Committee’s consideration.

THE BACKGROUND

1. **The proposed 17-storey development plans have evolved and been refined since the original 2014 submission to address comments from the community and City Staff.**
 - Now 17 storeys (originally 25 storeys).
 - Now 173 residential units (originally 180 units).
 - Now a mix of 1-bed, 2-bed, and 3-bed units (originally 1-bed and 2-bed only).
 - Has a range of unit sizes from 650 to 1,625 square feet in floor space.
 - Maintains ground floor commercial space facing Wellington Street.
 - Maintains the existing access locations to Wellington Street and Wolfe Street.
 - Lowers the building podium to 3 storeys (originally 4 storeys).
 - Redesigns the building podium with materiality and architecture to reflect the surrounding heritage fabric.
 - Redesigns the building tower to emulate the material choices of the podium.

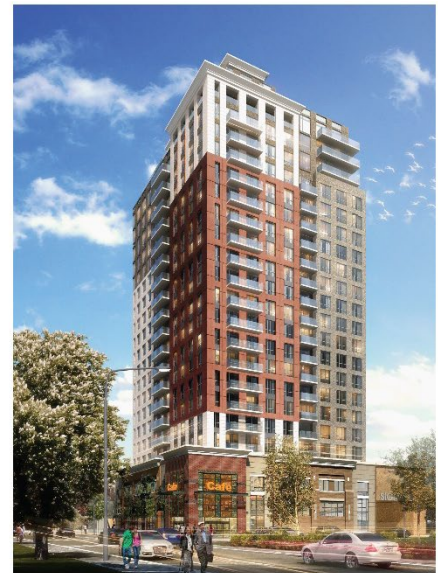


2. The proposed 17-storey development plan that is before the Committee is the culmination of a decade-long planning and planning approvals process for the Subject Property.

- First submission to the draft London Plan process submitted in November 2014, which was concerned with the height and intensity proposed for the Subject Property.
- 25-storey development plan, supporting studies, and OPA and ZBA applications (the “**Original Applications**”) were submitted in December 2014.
- Original Applications progressed through technical review, review committees/panels, and public information meetings in the first half of 2015.
- Original Applications were put on hold in later 2015 to explore opportunities for refining the proposed development concept to address comments.
- Second submission to the draft London Plan process submitted in June 2016, which requested a higher order Place Type and special policies for the Subject Property.
- 22-storey development plan, supporting studies, and revised OPA and ZBA applications (the “**Modified Applications**”) submitted in December 2016.
- Modified Applications were referred back to City Staff at the May 2017 PEC meeting to further explore design options.
- London Plan appealed site-specifically for the Subject Property in September 2017.
- Attendance at the initial Community Information Meetings for the Victoria Park Secondary Plan (October 2018 and January 2019).
- Four submissions on behalf of the Owner into the Secondary Plan process and regarding drafts (March 2019, April 2019, September 2019, and January 2020).
- Attendance at multiple PEC Meetings for consideration of the draft Secondary Plan documents (June 2019 and February 2020).
- Attendance at multiple Community Information Meetings for the consideration of the draft Secondary Plan (September 2019 and November 2020).



CURRENT DESIGN - 17 STOREYS
2021 / 07 / 21

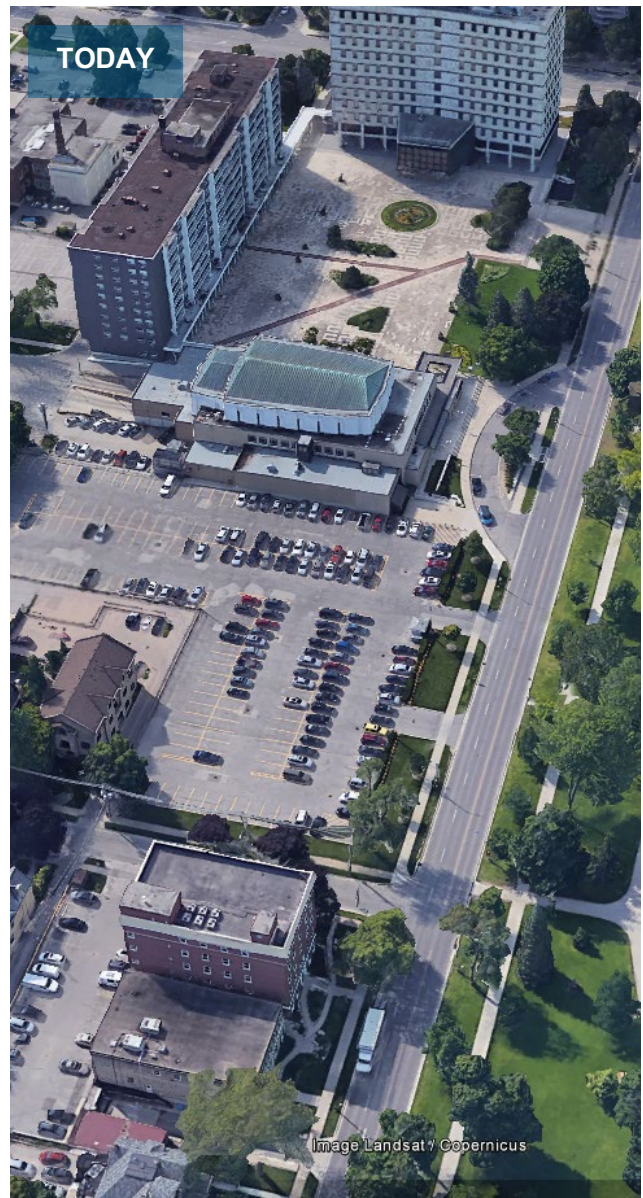
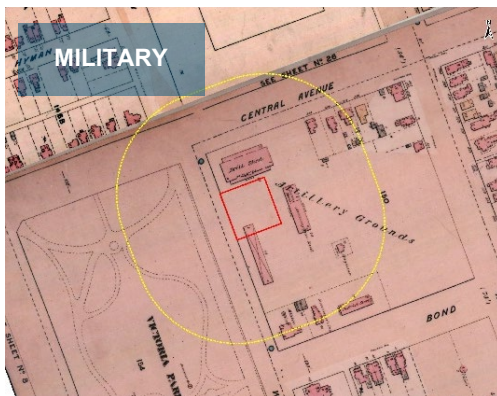
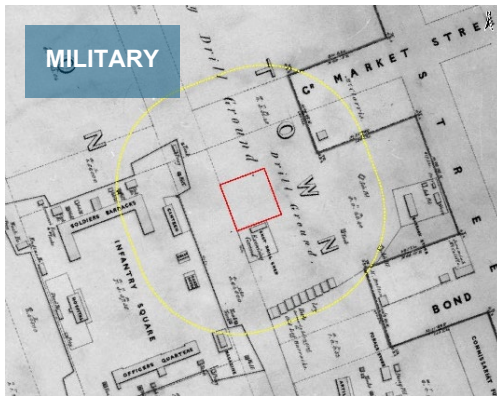


PREVIOUS DESIGN - 22 STOREYS

THE CONTEXT

3. The Wellington Street North corridor has evolved differently from the rest of the Woodfield Neighbourhood.

- Subject Property is not an internalized part of the Woodfield Neighbourhood.
- Instead, it forms part of an evolving Wellington Street corridor that is not static in nature and has a different heritage experience to the Neighbourhood's inner areas to the east.
- 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 (including the Subject Property).
- This distinction from the low-rise residential fabric associated with much of Woodfield to the east is a significant for understanding the context for the proposed applications.



4. The existing detached dwelling fabric on the Subject Property's Wellington-to-Waterloo block has also transitioned in use over time.

- The heritage residential building fabric remains largely intact on the subject block.
- Block is characterized by detached dwellings that have been converted to allow for ground floor office use with residential units above or to multiple residential uses.
- Rear yards 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.
- Mid-rise apartment building sits on Central Avenue, beside which is an approved site for mid-rise apartment building at the Waterloo Street and Central Avenue.
- These patterns of use influence the sensitivities of the surrounding context and inform the assessment of impacts resulting from the proposed building.



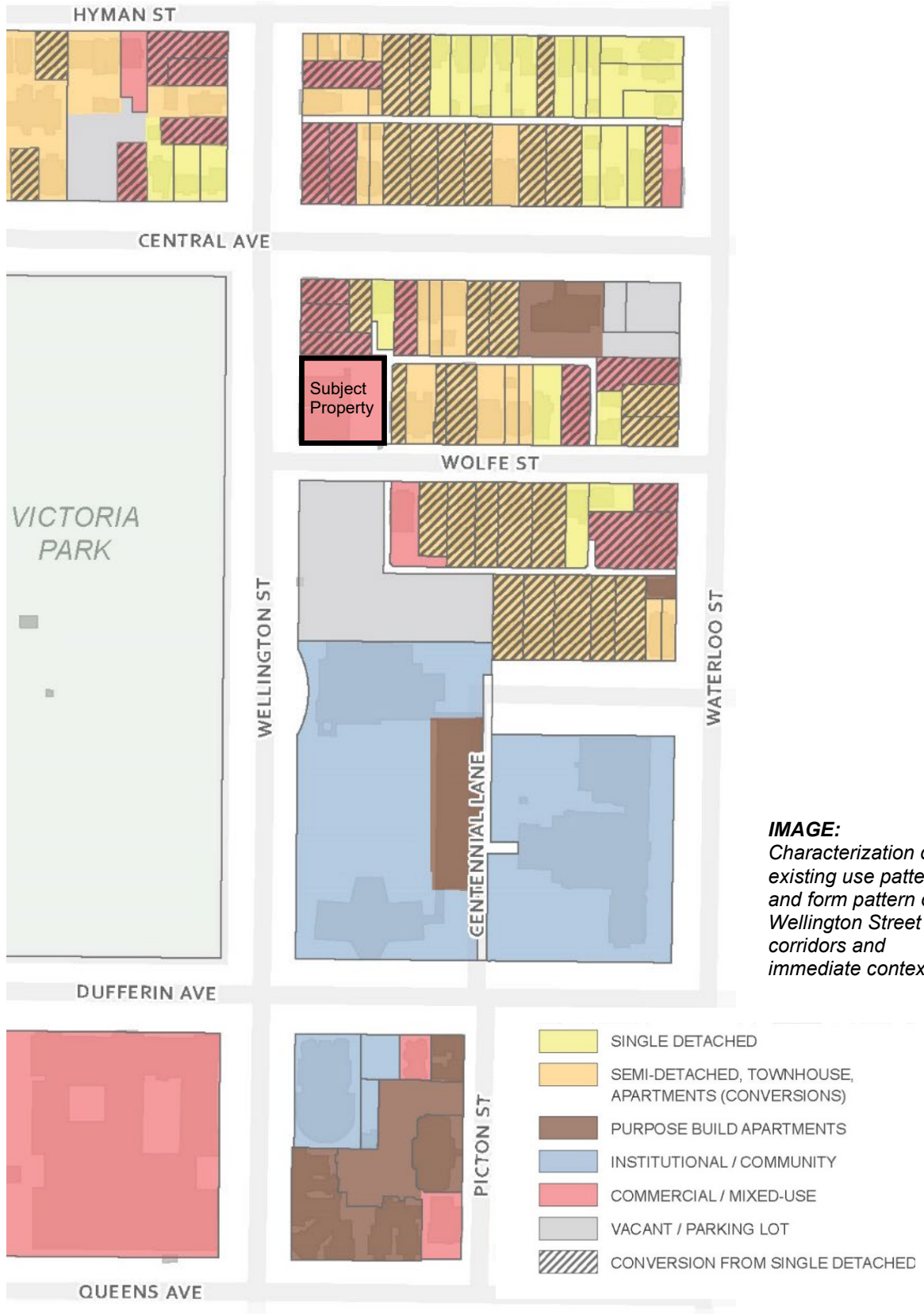


IMAGE:
 Characterization of existing use pattern and form pattern of Wellington Street corridors and immediate context.

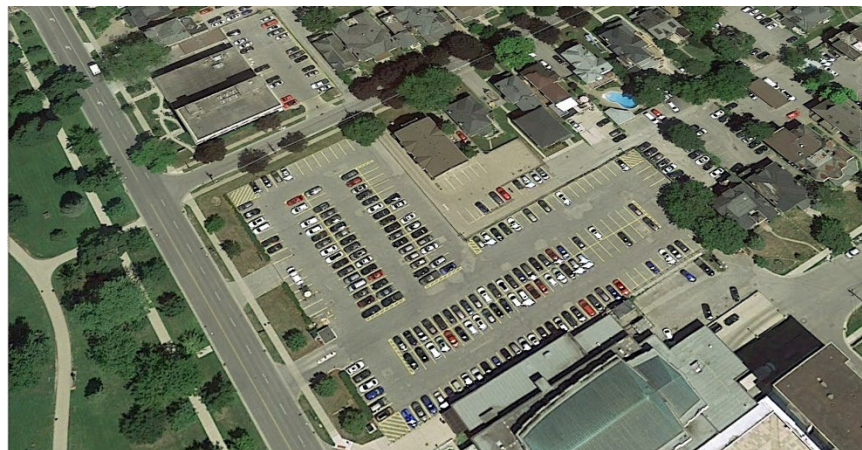
5. The two existing buildings on the Subject Property re relatively contemporary additions to the Wellington Street corridor and the Woodfield Neighbourhood.

- Original residential fabric on the Subject Property was demolished in the 1960s.
- Current buildings on the Subject Property were constructed in the 1970s.
- Heritage Impact Assessment determined that the current buildings have no cultural heritage or interest from a building character perspective (they do contribute to the streetscape character).
- Heritage Impact Assessment concluded that a positive streetscape contribution can be established through demolition and a new building on the Subject Property without a detrimental effect on the West Woodfield character.



6. The transitional nature of the Wellington Street corridor is further highlighted by recent approvals for a high-rise development at 556 Wellington Street facing the Subject Property.

- Recent Site Plan Approval for 556 Wellington permits a multi-tower development configured with an 18-storey building lining the property's Wellington Street frontage and a 12-storey building oriented perpendicularly to the rear.
- No longer a zoning hypothetical, this approval further reinforces the notion that the Wellington Street corridor is clearly distinct from the remainder of West Woodfield.
- Evolving nature of the subject Wellington Street corridor provides a contextual interface towards the Victoria Park and the Richmond Street corridor spine more so than the interior of West Woodfield neighbourhood.
- Scale of the approved 556 Wellington building informs the contextual analysis of the Subject Property regarding the appropriateness of the proposed development's form and scale.



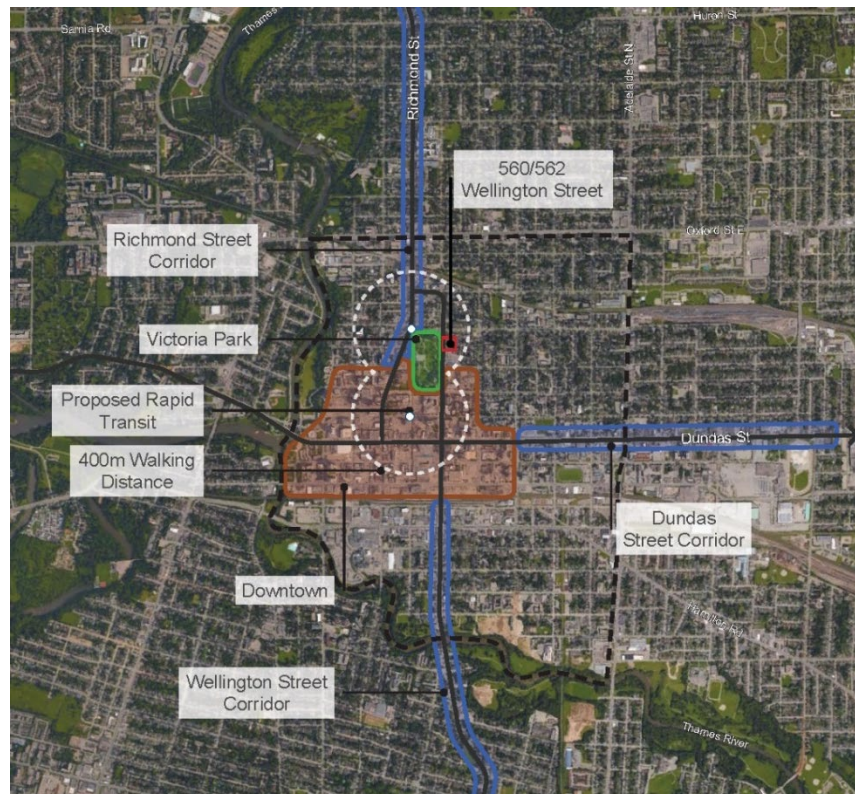
THE POLICY BASIS

7. The OPA is an Amendment to the 1989 Official Plan.

- Proposed OPA and ZBA applications pre-date the approval of the London Plan.
- Proposed OPA and ZBA applications are directed by the 1989 Official Plan.
- The Subject Property is currently under appeal in the London Plan.

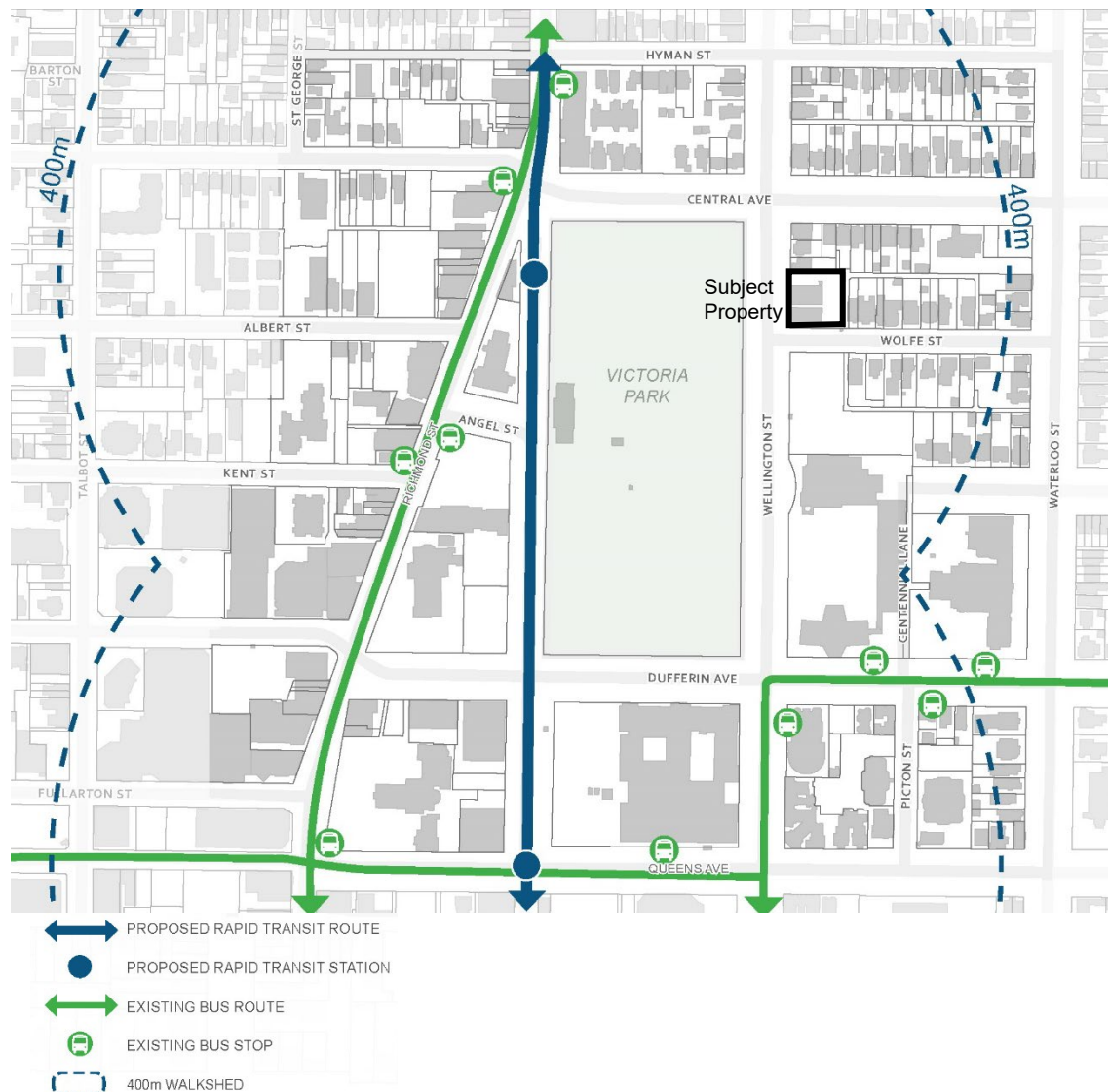
8. The Subject Property is consistent with the 2020 PPS direction for promoting appropriate locations for a “range of uses and opportunities” for intensification and redevelopment.

- Proposed development supports Richmond corridor and Downtown businesses and economic activities.
- Proposed development is served by existing local transit services along Richmond Street and in Downtown.
- Proposed development better optimizes the use of a prominent site immediately surrounding a planned rapid transit station on Richmond (a 3-minute walk).
- Proposed development is served by many public facilities within Central London.
- Proposed development is served by existing sanitary, water, and storm water infrastructure with no extensions or improvements required.
- Proposed development fronts on the arterial corridor of Wellington Street.
- Proposed development can occur without adverse impacts on surrounding context, as outlined in following commentary.



9. The proposed development form, scale and intensity is consistent with the 2020 PPS's stronger emphasis on transit-supportive development.

- 2014 PPS was in effect at the time of the Original Applications and Modified Applications.
- 2014 PPS identified transit-oriented development as development that makes transit “viable”.
- 2020 PPS identifies transit-oriented development as development that “*optimizes investments in transit infrastructure*”.
- Subject Property is within 250 metres of a future BRT station on Richmond and close to local routes in surrounding area.
- Low Rise Residential / Office is not an optimal use of the Subject Property given context and prominence in Central London’s structure.
- Proposed high-density designation and zoning better supports the intent for “*optimization*” as part of transit-supportive development than the low-rise residential designation on the Subject Property.

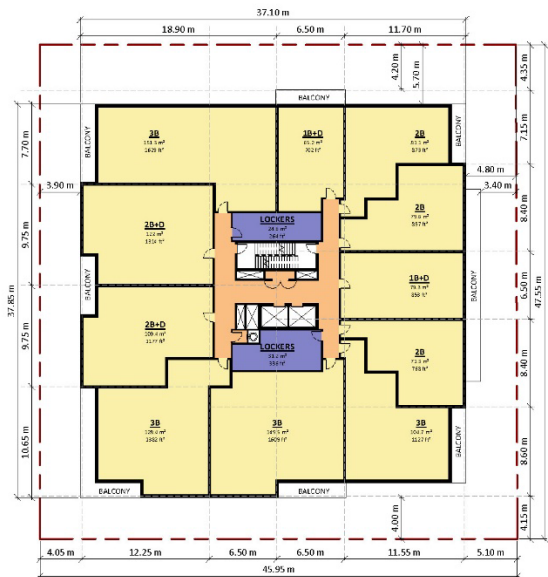


10. The proposed development's mix of unit types and size is consistent with the 2020 PPS direction for diversity of options in the housing stock.

- 2020 PPS directs that planning authorities are to “provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area”:
 - Permitting and facilitating all types of residential intensification and redevelopment
 - Directing new housing development towards locations with appropriate levels of infrastructure and public services facilities
 - Promoting new housing densities that efficiently use land, resources, infrastructure and public service facilities
 - Promoting new housing densities that support active transportation and transit use
 - Requiring transit-supportive development and prioritizing intensification close to transit stations and corridors
- New requirement in 2020 PPS for transit-supportive development around transit stations for the purposes of accommodating a range and mix of housing options elevates the importance of sites such as the Subject Property for intensification and redevelopment.
- Revised development plans provide for a full range of apartment unit types with a mix of one-bedroom, two-bedroom and three-bedroom units.
- Building will cater to a range of different residents, from first-time buyers to older residents downsizing in the neighbourhood and to those with children requiring larger units.
- Proposed zoning standards support a compact form and minimize housing cost, while presenting no impacts to public health or safety.



① TYPICAL FLOOR 5 - 13
1 : 200



① TYPICAL FLOOR 16 - 17
1 : 200

11. The proposed development is consistent with the 2020 PPS direction for the conservation of built heritage resources through mitigation measures.

- Existing buildings on the Subject Property *“were not determined to contain cultural heritage or interest, though their form contributes to the general streetscape character”*.
- PPS intent of *“to conserve”* may be achieved by the implementation of mitigative measures and/or alternative development approaches per Heritage consultant.
- Heritage Impact Assessment evaluated the potential impacts on the surrounding fabric of the West Woodfield HCDP and recommended mitigation measures (view, vibration and building design).
- These mitigations, such as compatible podium design and set back of the tower from the podium base are consistent with mitigation measures endorsed by City Planning Staff on other recent high density applications within or adjacent to Heritage Conservation Districts.



12. The location of the Subject Property and the form of the proposed development conform to the broad city-building objectives and directives of the 1989 Official Plan when it comes to higher density residential uses.

- Section 2.2.1: proposed development is a more intensive residential form focused along Wellington and Richmond major corridors to facilitate public transit.
- Section 2.4.1vi): proposed development is a high density residential development directed to an appropriate area adjacent to the Downtown with a compatibility form with the continually evolving Wellington Street corridor.
- Section 2.4.1xvi): proposed development provides a compact urban form and efficient use of serviced land that avoids a scattered development pattern, maximizes the use of existing services, supports public transit, and avoids new infrastructure needs.
- Section 3.4.2: Subject property fits the considerations for preferred location for the Multi-Family, High Density Residential designation near the periphery of the Downtown.

13. Despite the London Plan not being in effect for the Subject Property, the location of the Subject Property and the form of the proposed development meets the broad city-building directives regarding higher density residential uses.

- Policy 59: proposed development supports a city structure that focuses high-intensity, mixed-use development to strategic locations along rapid transit corridors and within the Primary Transit Area.
- Policy 79: proposed development embraces the emphasis on growing “inward and upward” with a compact development form within the existing built-up area of London.
- Policy 81: proposed development supports the minimum 45% intensification target within the built-up boundary.
- Policy 83: Subject Property is an appropriate location for intensification recognizing surrounding transit, commercial and community services and a good fit with the continued and emerging higher density intensification of the Wellington Street corridor.
- Policies 90, 91 and 92: proposed development supports focus of higher intensity intensification within the Primary Transit Area contributing to the desire for three-quarters of the intensification target.
- Policy 94: proposed development form is supported by Central London policies contemplating greater heights and densities than in other locations within the same Place Type.
- Policies 153 and 154: proposed development achieves a multitude of urban regeneration objectives, supporting civic infrastructure investments (transit, public facilities, parks), supporting Downtown’s and Richmond Street’s business environment and strengthens choice in the surrounding urban neighbourhood, facilitating appropriate intensification in the evolving Wellington Street corridor, and expands the choice in the housing stock for a property overlooking Victoria Park.

14. The proposed building location, form, scale and intensity satisfies the criteria outlined for Multi-Family, High Density Residential uses and Planning Impact Analysis in the 1989 Official Plan.

- Shadow Impacts: Demonstrated to be acceptable by shadow analysis evaluating impacts on Victoria Park, public sidewalks, and residential rear yards.
- Wind Impacts: Safety criteria and desired comfort conditions generally acceptable per wind study with building refinements through detailed design (canopies and entrances)
- Heritage Impacts: Impact assessment concluded no direct impacts to surrounding heritage properties; mitigation of indirect impacts associated with changes in views is recommended.
- Heritage Character: Design provides for a compatible, complementary architectural character with the surrounding context with complementary ground floor setbacks, a brick-based material palette, a street-scaled podium scale and articulation reflecting a low-rise residential rhythm, and balance of materiality and airiness in the tower portion.

- Transit Proximity: Subject Property is a 3-minute walk to the Richmond Road transit corridor and a short walk to other nearby transit routes.
- Traffic Impacts: Surrounding intersections would operate at acceptable service levels during peak hours and no road or traffic control improvements are required
- Buffering: Need for buffering and transition minimized given the existing rear-parking block context and land use conversion of the subject Wellington-to-Waterloo block.
- Parking Impacts: Proposed parking supply complies with the existing zoning; site-specific reduction to parking rates is not proposed.
- Available Land Supply: Subject Property accommodates high density residential option within an urban residential fabric facing a prominent greenspace; context is not the same as the existing supply of designated properties within the Downtown London core.



15. A Special Policy for the Subject Property is appropriate as it does meet one of the conditions of Section 10.1 of the 1989 Official Plan.

- Condition iii) applies to the Subject Property: *“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”*.
- Unique mixture of existing and evolving residential and non-residential uses along this segment of the Wellington Street corridor.
- Corridor should be intermediary designation between the Downtown to the south, Richmond corridor to the east, and residential fabric to the east, given the above evolving and transitional nature.

CONCLUSIONS

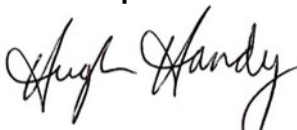
In our opinion, the Proposed Applications for an OPA and ZBA regarding a 17-storey building continue to be appropriate and represent good land use planning. The Subject Property is an appropriate location for a tall building and provides a more meaningful intensification opportunity in Central London and surrounding the planned rapid transit service, furthering Provincial policy objectives. The Proposed Applications are consistent with the 2020 Provincial Policy Statement; in particular, the Proposed Applications and development:

- Links the Subject Property's prominence of location, infrastructure, employment and recreational attributes with complementary higher intensity residential permissions.
- Better optimizes the use of a property situated approximately 250 metres from existing transit and planned rapid transit investments along the Richmond Street corridor.
- Provides a compact intensification on a prominent location within Central London that would provide benefits to local businesses and community activities within Downtown London and along Richmond Street;
- Supports higher order transportation corridors and planned rapid transit corridors immediately near the Subject Property along Richmond Street and other arterial roads;
- Recognizes a more sensitive and integrated transition from the Downtown designation boundary, which is two blocks away from the Subject Property, and the Downtown zoning boundary, which is immediately adjacent to and facing the Subject Property;
- Completes the higher intensity Wellington Street corridor along Victoria Park that is either permitted (for the properties extending to and including the Civic lands near Dufferin Avenue) or that is existing (such as at the terminus of Pall Mall Street);
- Can be achieved without creating unacceptable impacts on the surrounding neighbourhood resulting from the taller building form; and,
- Provides for housing choices and more diverse forms and tenureship within Central London to add to the vibrancy of living in the core area of London.


We look forward to the November 1st Planning and Environment Committee for the consideration of the proposed OPA and ZBA applications. We intend to be a delegate to provide the highlights of the enclosed and answer any questions the Committee may have.

Yours truly,

GSP Group



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cc. Steve Stapleton, Vice President, Auburn Developments Inc.