

To: Planning and Environment Committee
City of London

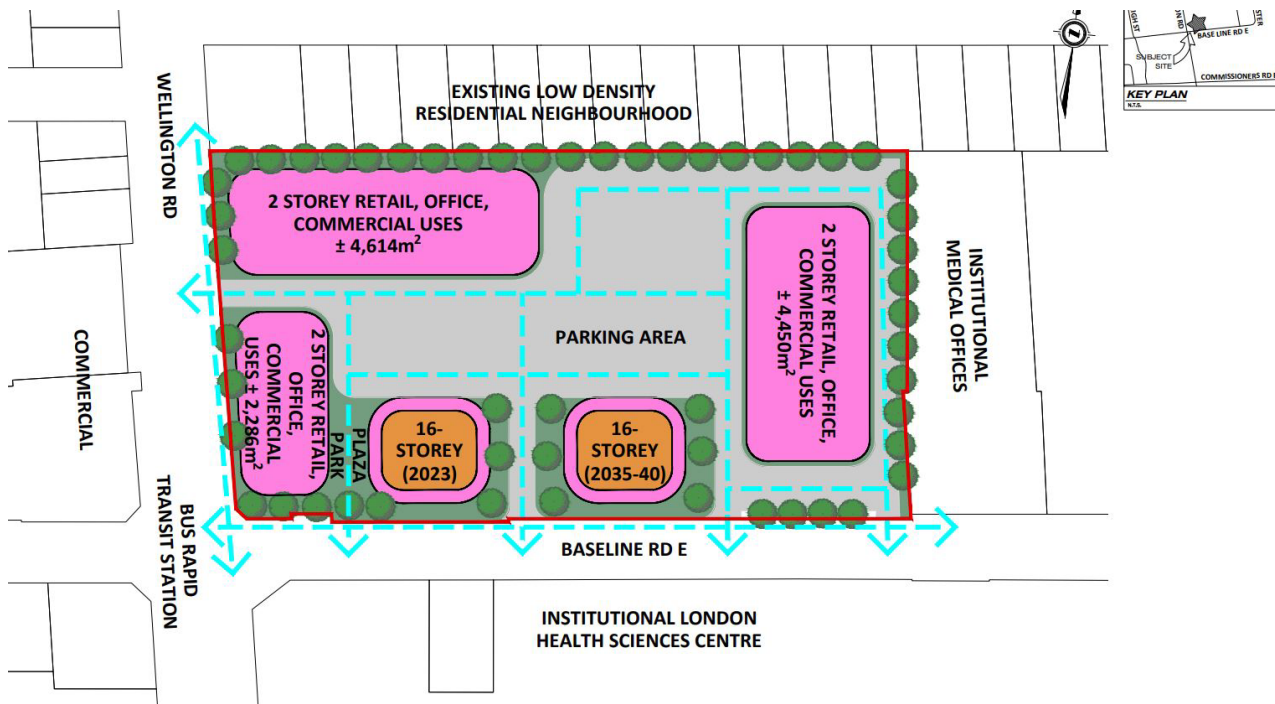
Date: August 18, 2022

RE: 712 Base Line Road East – Proposed Mixed-Use 16 Storey Tower – Bonus Zone Review (City File # Z-9474)

The following memorandum pertains to specific matters of the draft bonus zone for the proposed 16- storey, 150-unit residential and commercial tower at 712 Base Line Road East. It is requested that the Bonus Zone be amended to remove the selected urban design provisions, and amend the requested minimum number of affordable units.

The said bonus zone allows the proposed development to attain 16 storeys in height. Such a building would normally be permitted a maximum height of 12 storeys at the 712 Base Line Road East location in accordance with London Plan policies. The proposed development would replace an existing retail building that was until recently a Beer Store. More importantly, the proposed development is part of a larger Master Plan for the entire redevelopment of the Westminster Shopping Mall which encompasses 712 Base Line Road East.

Master Plan



As was stated to City staff, the proposed 16 storey building initially appears in isolation, but it will be one of multiple components of the redevelopment of the existing commercial plaza as outlined in the submitted Master Plan. As the BRT system becomes better established, there is planned to be continued residential intensification of the site with greater conversion of surface parking area to more pedestrian and greener/amenity space. It

should be noted that the South Corridor of the BRT system will not start development till 2023, and is not scheduled to be completed till 2026

The redevelopment of the commercial plaza is planned in three phases over approximately twenty-five years, in anticipation of the continued increase of BRT infrastructure and ridership. The overall vision for the redevelopment of the plaza encompasses:

- two high-rise apartment towers of 16 storeys;
- medium density, medium rise multi-family buildings, of approximately 4 storeys maximum;
- commercial ground levels with small to medium sized stores from 50m² to 1000 m², cafes, boutiques, restaurants;
- surface and underground parking, as well as upper-level structure parking in the apartment towers.
- an active transportation system that reinforces the Transit Village place type and focus on the Bus Rapid Transit System; and
- an appropriate mix of amenity areas including open space, parks, and parkettes.

Bonusing Zone Concerns

Westdell Development Corp. is appreciative of City of London Planning Staff's general support of the application, recognizing that it is a transit-oriented development that will strengthen public transit use, particularly in the initial phases of the south leg of London's planned Bus Rapid Transit (BRT). Further it will provide much needed housing, and affordable housing in a strategic area of the City, across from the London Health Sciences Centre and Victoria Hospital, northeast of Wellington Road and Base Line Road.

As alluded to above, the matters of concern related to the bonus zone fall in two categories:

- 1) The desired number of affordable housing units
- 2) Requested urban design elements that are physically impracticable for the proposed development

Affordable Housing Units

With regards to affordable housing units, Westdell Development Corp. supports the provision of affordable units as per the London Plan policies which are now fully in force and effect. In keeping with the London Plan policies, 5 affordable housing units are required as per London Plan policies.

This is consistent with the feedback provided during Pre-Consultation which is captured in the Record of Consultation. City Planning and Urban Design staff both make references specifically to the London Plan for bonusing and amendments to the Zoning By-law. The Record of Consultation states:

"The London Plan contemplates a maximum height of 16 storeys with Bonus in the Rapid Transit Corridor Place Type. As this proposal will require a Bonus Zone, the proposed building and site design should incorporate the following as part of the future Zoning By-law Application..."

That said, City Planning Staff are now utilizing the policies of the 1989 Official Plan to determine the appropriate number of affordable housing units. Under the 1989 Official Plan policies, which view 'housing lift' based on density rather than building height (as is the case in the London Plan) 12 affordable units would be required.

In good faith, Westdell Development Corp. is willing to go beyond the 5-unit affordable housing requirement of the London Plan and provide 8 affordable housing units. As would be expected in the case of 12 affordable housing units, Westdell Development Corp. would provide the 8 units in keeping with Planning staff and Housing Development Corporation staff's general expectations of:

- i. A minimum of 10% of the 'building lift' will be provided in the development, representative of the bedroom and unit mix of the overall building;
- ii. Rents not exceeding 80% of the Canada Mortgage and Housing Corporation (CMHC) Average Market Rent (AMR) for the London Census Metropolitan Area (CMA) at the time of building occupancy; where AMR is defined at the one-bedroom, two-bedroom and three-bedroom rate for the London CMA at the time of building occupancy;
- iii. The duration of affordability set at 50 years from the point of initial occupancy of the respective building;
- iv. The proponent enter into a Tenant Placement Agreement (TPA) with the City of London to align the affordable units with priority populations;
- v. These conditions to be secured through an agreement entered on title with associated compliance requirements and remedies.

The select adherence to only the 1989 Official Plan in this context is not in keeping with consistent and equitable planning policy implementation and administration. This investment contributes well over two million dollars in increasing the supply of affordable housing in a key area of the City, and will generate substantial funds to the City in on-going property taxes. Westdell Development Corp. has contributed immensely to the revitalization of numerous previously derelict commercial plazas throughout the City and their surrounding neighbourhoods.

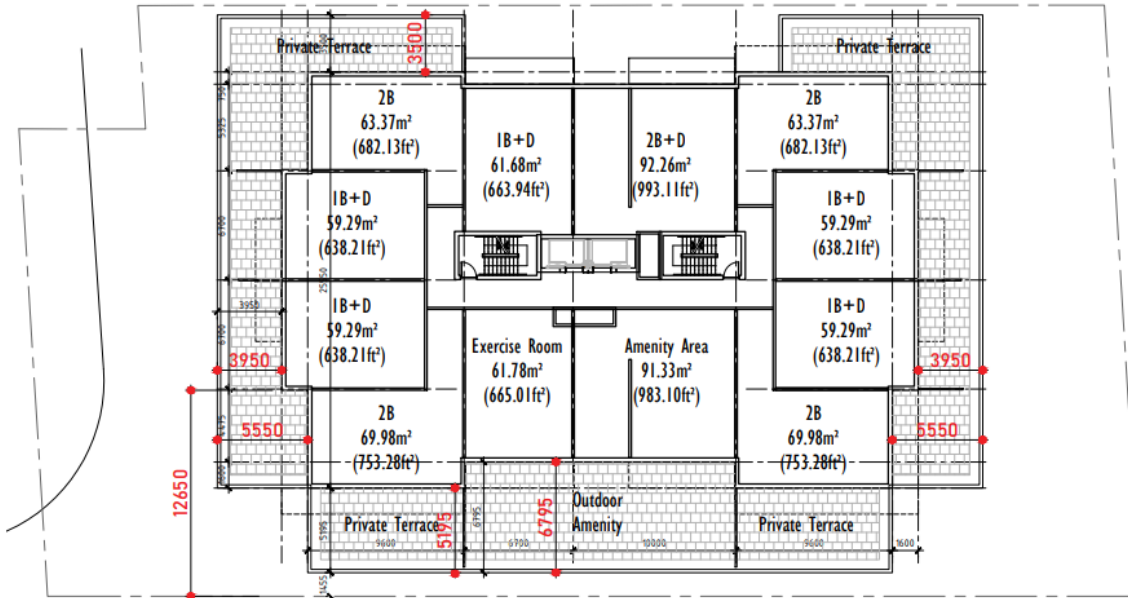
Urban Design and Building Design

With regards to urban design, the design of the building has followed London Plan urban design policies and guidelines. The building is of a high-quality design and meets the desired point-tower form with a podium base and clearly defined 'base, middle, and top' configuration espoused by City Urban Design staff. However, there are particular urban design elements requested by City staff, that are impracticable given the site context at present. Further the goals of the said urban design elements are addressed by other architectural and design means. The urban design elements which are not reasonably achievable include:

- The provision of a 'full forecourt'
- Providing for a front yard setback of 2-4m for more urban streetscape treatment
- Creating a minimum 5 metre step-back at the 4th floor

The provision of a full forecourt and creating a greater front yard setback are not possible given the need to maintain a certain level of parking for existing commercial tenants of the plaza and ensure the existing parking layout is functional. Nonetheless, the base of the proposed building is street-oriented and would create an attractive and animated street edge with the inclusion of commercial units on the ground floor.

A well-designed step-back at the 4th floor along Base Line Road is already planned to be provided. The planned step-back would achieve the same objective of creating desirable amenity space and enhancing the pedestrian realm. An image of the 4th floor plan showing the currently planned step-back is provided below



4th Floor Plan

Floor Plate 921.71m² (9921.53ft²)

SCALE 1 : 200

Closing

Westdell Development Corp. is committed to the revitalization and redevelopment of 712 Base Line Road. We humbly ask that PEC members support the rezoning and associated bonusing for this site based on the multiple contributions noted above and ask that the highlighted urban design and affordable housing provisions of the bonus zone be amended accordingly. The site will be developed in a comprehensive manner that is harmonious and responsive to the future bus rapid transit. Please fee free to contact the undersigned should you have any questions or wish to discuss the proposed transit-oriented development. We thank you for your consideration.

Respectfully Submitted,

Strik, Baldinelli, Moniz Ltd.

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