

Report to Planning and Environment Committee

To: Chair and Members
Planning & Environment Committee

From: Scott Mathers, MPA, P.Eng.,
Deputy City Manager, Planning and Economic Development

Subject: 300-320 King Street
City File: Z-9570 Ward 13
Public Participation Meeting

Date: April 11, 2023

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of Zelinka Priamo Ltd., on behalf of Royal Host GP Inc. and Holloway Lodging relating to the property located at 300-320 King Street:

- (a) the proposed by-law attached hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting April 25, 2023 to amend Zoning By-law No. Z.-1, in conformity with The London Plan for the City of London, to change the zoning of the subject property **FROM** a holding Downtown Area (h-3*DA2*D350)) Zone **TO** a holding Downtown Area Special Provision (h-()*DA2(_)) Zone;
- (b) **IT BEING NOTED** that the following site plan, urban design and heritage matters that were raised during the application review process for consideration by the Site Plan Approval Authority:
 - (i) To ensure sufficient amenity space has been provided, the amount of outdoor amenity space as presented on the architectural drawings should remain;
 - (ii) To ensure the development represents uniqueness and individual creativity to develop a landmark and contribution, the proposed development should generally reflect the middle portion of the tower as submitted on the architectural drawings with materials and an architectural expression;
 - (iii) To ensure the built form enhances the pedestrian environment, the ground floor and podium facades should provide depth and variation;
 - (iv) Provide a variety of window glazing along the King Street ground floor façade to create visual interest and sightlines for sense of safety;
 - (v) Design the space between the building and the street to have an urban character and an appropriate mix of hard- and softscape. Include street trees and design pedestrian routes to follow natural desire lines;
 - (x) To ensure impact from wind, consideration will be given to the common amenity terraces to include wind screens on Level 6 predicted to experience wind conditions suitable for sitting to the immediate north and south of the tower, Level 33 and 35 predicted to be suitable for sitting;
 - (xi) To mitigate the risk for indirect impacts on the built heritage resource – The Delta Armouries Hotel, a strategy to carry out a pre-condition survey, vibration monitoring and post-condition survey should be developed by a licensed engineer preferably with heritage experience;
 - (xii) The property should be subject to a vibration assessment prior to the commencement of construction to establish a “Zone of influence” and vibration monitoring and control system and policy be developed and implemented to ensure levels remain below the accepted threshold during all construction activities, to ensure there are no indirect impacts to adjacent structure, of particular note is the Delta Armouries Hotel at 325 Dundas Street. Vibration monitoring should be carried out by an individual with previous knowledge of heritage structures and the impact of vibration on heritage resources;
 - (xiii) The recommendations outlined in the noise study including roadway and railway mitigation measures be implemented and a more detailed noise

assessment will be required at the time of site plan review to determine specific noise control measures for the building itself.

- (c) pursuant to Section 34(17) of the *Planning Act*, as determined by the Municipal Council, no further notice **BE GIVEN** in respect of the proposed by-law as the recommended zoning generally implements the site concept submitted with the application. As part of the application review process a revised site plan concept was submitted with minor revisions including a new height of 112.0 metres; however, which is still within the 35-storeys as originally proposed.

Executive Summary

Summary of Request

The applicant has requested to rezone the subject site to a Downtown Area Special Provision (DA2(_)) Zone to permit 35-storey, 435-unit mixed-use building with a central residential tower, and a 4 and 5-storey podium across consisting of commercial space, a parking structure, and bicycle storage. A Site Plan Control application was currently being processed to permit the conversion of part, or all, of the existing hotel units to residential units; however this has been cancelled. That being said, a density of 595 units per hectare (uph) is proposed for the development, resulting in a total site density of approximately 940uph if the existing hotel is completely converted to apartments. Special provisions would permit 0% landscaped open space, a maximum building height of 111m, a maximum lot coverage of 97%, and a maximum density of 940uph.

Purpose and Effect of Recommended Action

The purpose and effect of the recommended action is to rezone the subject site to permit the development of a 35-storey, 435-unit mixed-use building with a central residential tower, and a 4 and 5-storey podium across the entire site consisting of commercial uses, a parking structure, and bicycle storage. If all the existing hotel units are converted to residential, together with the new development will be the equivalent to a density of 940 units per hectare. The recommended action would add a holding provision to the site requiring all path loss issues be completed to the satisfaction of the Director of Emergency Communication, City of London.

Rationale of Recommended Action

1. The recommended amendment is consistent with the Provincial Policy Statement, 2020, which encourages land use patterns within settlement areas that provide for a range of uses and opportunities for intensification and redevelopment, as well as enhancing the vitality and viability of downtowns. The PPS directs municipalities to permit all forms of housing required to meet the needs of all residents, present and future.
2. The recommended amendment conforms to the policies of The London Plan including but not limited to the Key Directions, City Building policies, and the Downtown Place Type, facilitating a built form that contributes to achieving a compact, mixed-use city.
3. The recommended amendment conforms to Our Move Forward: London's Downtown Plan, by providing for a landmark development within the downtown core.
4. The recommended amendment facilitates the development of an underutilized site within the Built Area Boundary and Primary Transit Area with an appropriate form of development.
5. The recommended amendment facilitates a type of residential development that will help to address the growing need for affordable types of housing in London. The recommended amendment is in alignment with the Housing Stability Action Plan 2019-2024 and Strategic Area of Focus 2: Create More Housing Stock.

Climate Emergency

On April 23, 2019, Council declared a Climate Emergency. Through this declaration the

City is committed to reducing and mitigating climate change. Refer to Appendix “C” for further details on the characteristics of the proposed application related to the City’s climate action objectives.

Linkage to the Corporate Strategic Plan

Building a Sustainable City – London’s growth and development is well planned and sustainable over the long term.

Analysis

1.0 Background Information

1.1 Previous Reports Related to this Matter

None.

1.2 Planning History

A site plan application was submitted in August, 2022 to convert the hotel rooms at 300 King Street to apartment units. After further material submissions the City reconsidered our position regarding the requirements to go through Site Plan Control for the conversion. Given the nature of conversations at the time and the focus on intensity through Land Use Planning, the City was amenable to waiving Site Plan Control and the file was cancelled.

1.3 Property Description

The subject site is located on the northwest corner of the intersection at King Street and Waterloo Street. The irregularly shaped lands have an area of approximately 0.73ha with frontages of approximately 105 metres along King Street and approximately 50 metres along Waterloo Street. The subject lands abut the Delta Armouries hotel and a parking lot to the north; Waterloo Street to the east; King Street to the south; and, the City Centre towers to the west. RBC Place is located opposite the subject lands on the south side of King Street; and, the Centre Branch YMCA facility is located opposite the subject lands on the east side of Waterloo Street. Currently, the site is occupied by a 22-storey hotel (The Double Tree Hilton) and a 2-storey parking garage.

A

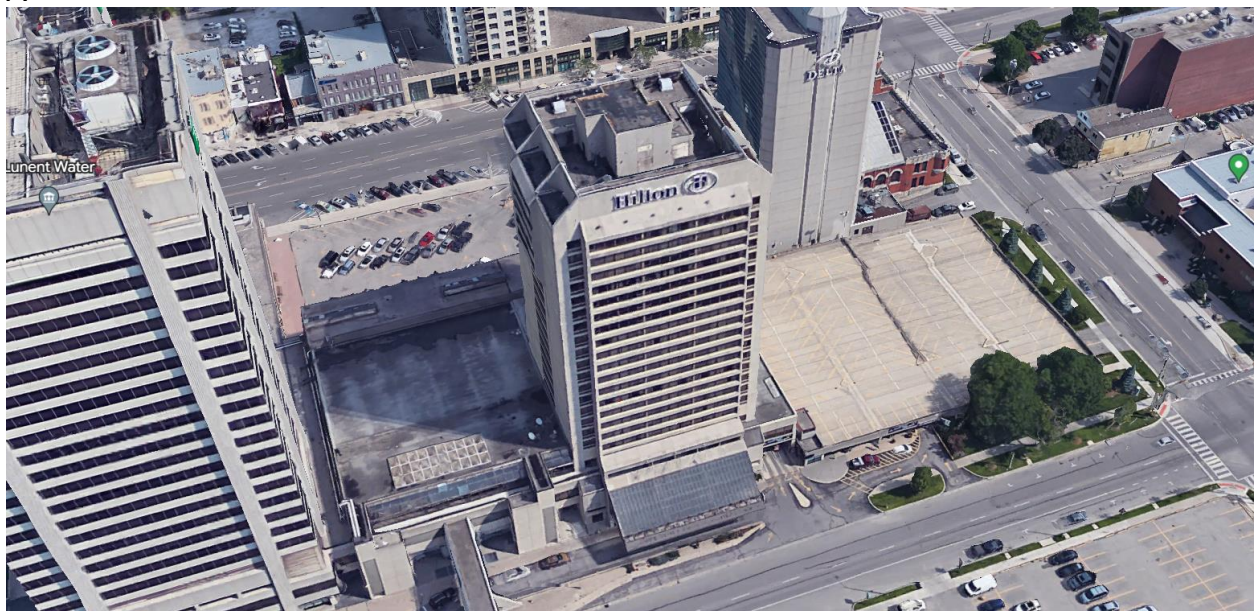


Figure 1: 300-320 King Street – Aerial View (Google Earth image, June 2021)

1.4 Current Planning Information

- The London Plan Place Type – Downtown Place Type
- Existing Zoning – Downtown (DA2) Zone

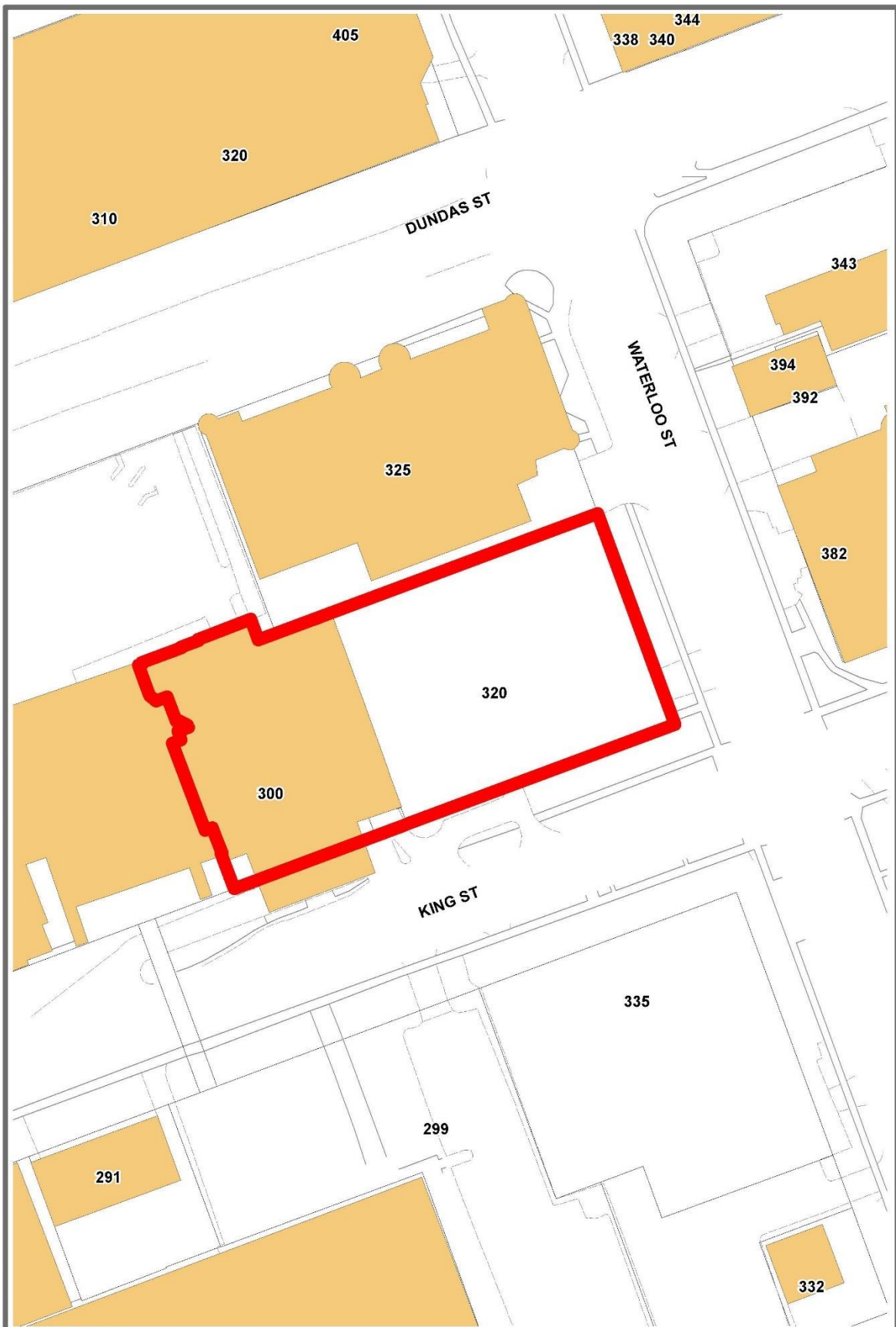
1.5 Site Characteristics

- Current Land Use – 2-storey parking garage
- Frontage – 50 metres
- Depth – 105 metres
- Area – 0.73 hectares
- Shape – Rectangular

1.6 Surrounding Land Uses

- North –Delta Armouries Hotel and parking lot
- East – Waterloo Street and YMCA
- South – King Street and RBC Place
- West – City Centre Tower

1.7 Location Map



LOCATION MAP

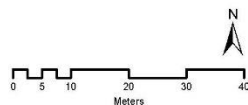
Address: 300-320 King Street

File Number: Z-9570

Planner: Alanna Riley

Date: 2022/11/24

Corporation of the City of London
Prepared By: Planning and Development



Scale 1:1000

Legend

-  Buildings
-  Assessment Parcels
-  Driveways/ParkingLots
-  Draft Approved Subdivisions

1.8 Intensification

The proposed 435 residential units represents intensification within the Built-Area Boundary and Primary Transit Area.

2.0 Description of Proposal

2.1 Development Proposal

- The applicant is proposing a 35-storey, 435-unit mixed-use building with a central residential tower, and a 4 and 5-storey podium across the entire site consisting of residential and commercial units, a parking structure, bicycle storage and residential units. A Site Plan Control application was currently being processed to permit the conversion of part, or all, of the existing hotel units to residential units; however this application has been cancelled.
- A density of 595 units per hectare (uph) is proposed for the development, resulting in a total site density of approximately 940uph if the existing hotel is completely converted to apartments.
- Special provisions would permit 0% landscaped open space, a maximum building height of 112m, a maximum lot coverage of 97%, and a maximum density of 940uph.

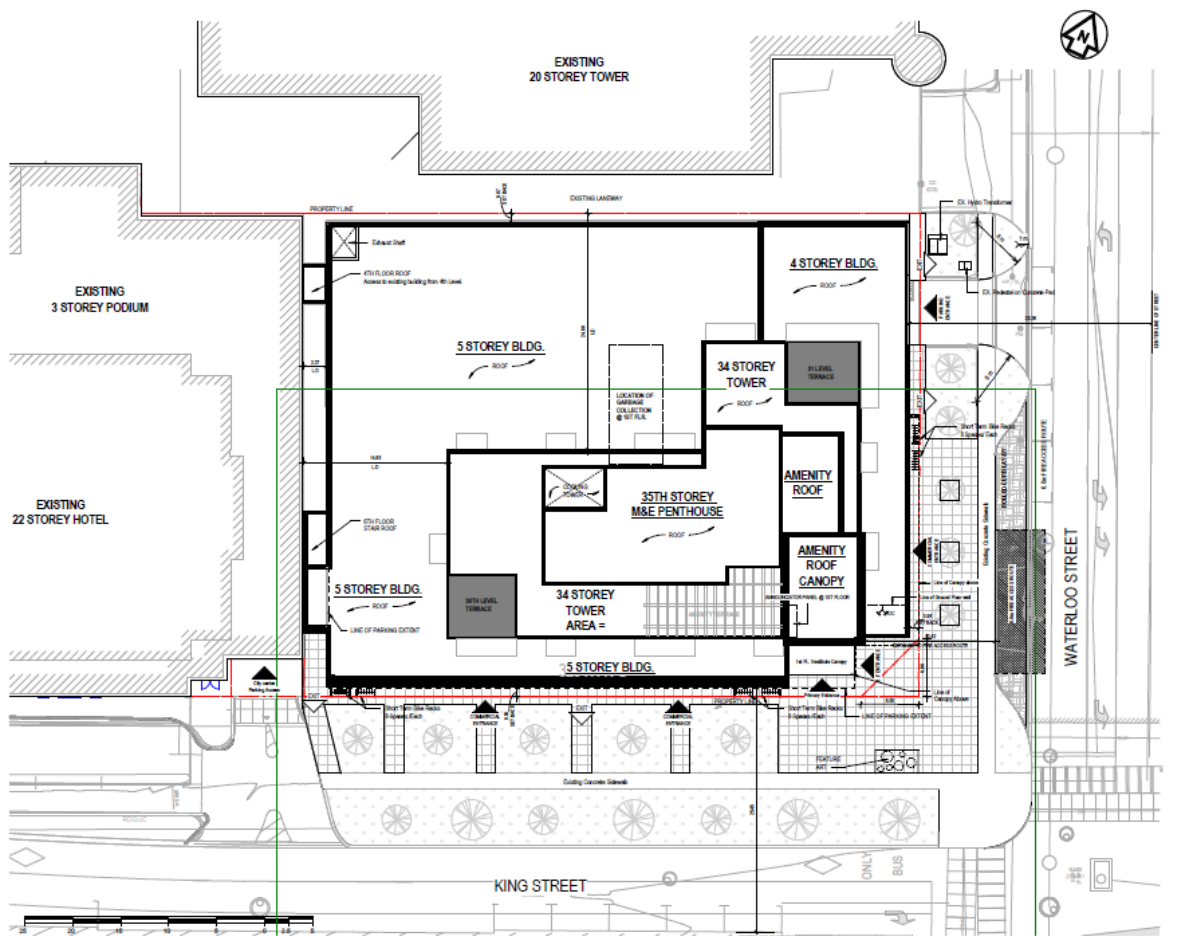


Figure 2: Concept Plan



Figure 3 - Overall View



Figure 4 - Southeast View



Figure 5 - Southwest View



Figure 6 - Northeast View

2.2 Requested Amendment

The applicant is requesting to change the zoning from a holding Downtown Area (h-3*DA2*D350) Zone to a Downtown Area Special Provision (DA2()) Zone. Requested special provisions include 0% landscaped open space, a maximum building height of 112m, a maximum lot coverage of 97%, and a maximum density of 940 units per hectare.

2.3 Community Engagement (see more detail in Appendix B)

Through the community engagement process, two written responses were received from members of the public.

The public concerns that have been raised with respect to the development proposal relate to the following matters:

- Loss of hotel units

The applicant has indicated that at this time converting the hotel is not being considered.

2.4 Internal and Agency Comments (see more detail in Appendix B)

The application and associated materials were circulated for internal comments and public agencies to review. Comments received were considered in the review of this application and are addressed in Section 4.0 of this report.

3.0 Financial Impacts

This application is eligible for financial incentives under the Downtown Community Improvement Program.

4.0 Key Issues and Considerations

4.1 Issue and Consideration #1: Provincial Policy Statement, 2020

The Provincial Policy Statement (PPS), 2020 provides policy direction on matters of provincial interest related to land use planning and development. In accordance with Section 3 of the Planning Act, all planning decisions “shall be consistent with” the PPS.

The PPS promotes efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term; accommodate an appropriate affordable and market-based range and mix of residential types, employment, institutional, recreation, park and open space, and other uses to meet long-term needs; and the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs (1.1.1).

Settlement areas are directed to be the focus of growth and development. Land use patterns within settlement areas shall be based on densities and a mix of land uses which: efficiently use land and resources; 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; minimize negative impacts to air quality and climate change, and promote energy efficiency; prepare for the impacts of a changing climate; support active transportation and are transit-supportive, where transit is planned, exists or may be developed (1.1.3.2). Land use patterns within settlement areas shall also be based on a range of uses and opportunities for intensification and redevelopment (1.1.3.2).

The policies of the PPS direct planning authorities to identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated, taking into account existing building stock or areas,

including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs (1.1.3.3). Additionally, the PPS is supportive of appropriate development standards which facilitate intensification, redevelopment and compact form (1.1.3.4).

Planning authorities are further directed to permit and facilitate all housing options required to meet the social, health, economic and well-being requirements of current and future residents as well as all types of residential intensification, including additional residential units and redevelopment (1.4.3b)). Densities for new housing which efficiently uses land, resources, infrastructure and public service facilities, and supports the use of active transportation and transit in areas where it exists or is to be developed, is promoted by the PPS (1.4.3d)).

Lastly, the PPS encourages long-term economic prosperity to be supported by promoting opportunities for economic development and community investment-readiness (1.7.1 a)) and also identifies that long term economic prosperity should be supported by encouraging a sense of place by promoting a well-designed built form (1.7.1e)).

Analysis

The recommended amendment facilitates the development of an underutilized site within a settlement area. The proposal provides for an appropriate mix and intensity of residential and commercial uses that are suitable and encouraged in the downtown. The proposed 35-storey mixed-use building contributes to the mix of housing types and provides choice and diversity in housing options for both current and future residents.

The site is well-located to support higher intensity uses that benefit from proximity to existing, resources, infrastructure and public service facilities, and will support the use of active transportation and transit. The proposed development supports the goals of the PPS by achieving a more compact, high density mixed-use form of development and helps create a sense of place along King Street and Waterloo Street by providing a well-designed built form. The proposed development would become an important landmark and represents an attractive and appropriate built form at a highly prominent location in the core of the downtown.

4.2 Issue and Consideration #2: The London Plan – Key Directions

The London Plan provides Key Directions that must be considered to help the City effectively achieve its vision (54_). These directions give focus and a clear path that will lead to the transformation of London that has been collectively envisioned for 2035. Under each key direction, a list of planning strategies is presented. These strategies serve as a foundation to the policies of the plan and will guide planning and development over the next 20 years. Relevant Key Directions that have been reviewed with respect to Use, Intensity and Form are outlined below:

The London Plan provides direction to plan strategically for a prosperous city by:

- Planning for and promoting strong and consistent growth and a vibrant business environment that offers a wide range of economic opportunities.
- Creating a strong civic image by improving the downtown, creating and sustaining great neighbourhoods, and offering quality recreational opportunities.
- Revitalizing our urban neighbourhoods and business areas.
- Investing in, and promoting, affordable housing to revitalize neighbourhoods and ensure housing for all Londoners. (Key Direction #1, Directions 1, 2, 4, and 13).

The London Plan provides direction to celebrate and support London as a culturally rich, creative, and diverse city by:

- Protecting our built and cultural heritage to promote our unique identity and develop links to arts and eco-tourism in the London region.
- Revitalizing London's downtown, urban main streets, and their surrounding urban neighbourhoods to serve as the hubs of London's cultural community.
- Developing affordable housing that attracts a diverse population to the city. (Key Direction #3, Directions 7, 9, and 11).

The London Plan provides direction to build a mixed-use compact city by:

- Implementing a city structure plan that focuses high-intensity, mixed-use development to strategic locations - along rapid transit corridors and within the Primary Transit Area.
- Planning to achieve a compact, contiguous pattern of growth – looking “inward and upward”;
- Sustaining, enhancing, and revitalizing our downtown, main streets, and urban neighbourhoods.
- Planning for infill and intensification of various types and forms to take advantage of existing services and facilities and to reduce our need to grow outward.
- Ensuring a mix of housing types within our neighbourhoods so that they are complete and support aging in place. (Key Direction #5, Directions 1, 2, 3, 4, and 5).

Lastly, The London Plan provides direction for a new emphasis on creating attractive mobility choices by:

- Linking land use and transportation plans to ensure they are integrated and mutually supportive.
- Focusing intense, mixed-use development to centres that will support and be served by rapid transit integrated with walking and cycling.
- Dependent upon context, requiring, promoting, and encouraging transit-oriented development forms. (Key Direction #6, Directions 4, 5, and 6).

These policies were also considered in conjunction with the Downtown Place Type policies for this application in review of use, intensity and form as discussed below in sections 4.3, 4.4 and 4.5.

4.3 Issue and Consideration #3: Use

The London Plan

The site is in the Downtown Place Type, as identified on Map 1 – Place Types. The Downtown is the highest-order mixed-use activity centre in the city (800_). A broad range of residential, retail, service, office, cultural, institutional, hospitality, entertainment, recreational, and other related uses are contemplated in the Downtown Place Type (800_1). Mixed-use buildings are encouraged, and along commercial-oriented streetscapes, retail and service uses will be encouraged at grade with residential and non-service office uses directed to the rear of buildings and the upper floors (800_2 and 800_3).

Analysis:

The proposed development is in keeping with the permitted uses of the Downtown Place Type as it provides for a mixed-use building with commercial uses at grade and residential above. Adjacent surrounding uses include high density residential, office, commercial, and commercial recreation. In this context, a 35-storey mixed-use development is not out of place and its impact on surrounding land uses would be mitigable.

Furthermore, the analysis of intensity and form below will demonstrate that the proposed development can be developed on the subject lands in a way that is appropriate for the site and surrounding area.

4.3 Issue and Consideration #3: Intensity

The London Plan

The Downtown will permit the tallest buildings and the highest densities in the city (802_). Buildings within the Downtown Place Type will be a minimum of either three (3) storeys or nine (9) metres in height and a maximum of 35-storeys may be permitted in conformity with the Our Tools policies in The London Plan (802_1). Tall buildings will be

permitted only where they achieve a high level of design excellence in conformity with the City Design policies (802_2). The site is located along a Rapid Transit Boulevard in The London Plan as identified on Map 3 – Street Classifications. The Rapid Transit Boulevard is intended to allow for a wide range of permitted uses and greater intensities of development close to rapid transit stations. These corridors are also intended to support the development of a variety of residential types, with varying size, affordability, tenure, design, and accessibility so that a broad range of housing requirements are satisfied (The London Plan, Policy 830_4 and 11). Also, these corridors are classified as streets designed to move high volumes of traffic, generate a high-quality pedestrian realm, and incorporate a high level of urban design (The London Plan, Policy 371_).

Analysis

The applicant has requested a height of 35-storeys (112 metres) and density of 940 units per hectare. The request for the density includes both the new development and opportunity to convert the existing hotel units to residential units in the future. The applicant has indicated that at this time converting the hotel is not being considered.

Staff are satisfied that the proposed intensity and scale of the proposed development is appropriate and is in conformity with The London Plan. As such, the applicant has met the Our Tools policies of The London Plan commensurate for the requested increased intensity by providing a building design and site layout that incorporates contemporary architectural themes and design elements to establish a prominent, intensive high-rise design that is compatible with the adjacent heritage building and local development context.

Also, underground and structure parking has been provided to eliminate surface parking on-site. Further, the subject site is of a size and configuration capable of accommodating a more intense form of development than the existing 2-storey parking garage that is sensitive to the existing adjacent heritage building at 325 Dundas Street – The Delta Armouries Hotel. Additionally, the subject lands as mentioned are located along a Rapid Transit Boulevard where there is direct access direct to London Transit bus routes and will abut the future Bus Rapid Transit system. The site is surrounded by a mix of high-rise commercial and offices, commercial recreation, and high-density residential uses. The site is also located within walking distance to a multitude of uses in the downtown which will help support the proposed intensity of the development while additional institutional uses such as places of worship, Central Secondary School, Catholic Central Secondary School, Beal Secondary School, and some primary schools are in relatively close proximity to the subject site. Additionally, there are several open space areas within approximately a 5-to-15-minute walk, one being Victoria Park.

Given this site is currently developed with a parking structure as mentioned above, the proposed development represents an appropriate form of intensification through infill development. The proposed intensity of the development will help contribute to the downtown as a whole, as the increased population will help support and attract existing/future commercial, retail and entertainment uses within the downtown core. The proposal is considered in keeping with the intensity policies set out by The London Plan. As such, staff is satisfied the proposed intensity and scale of development is in conformity with The London Plan.

4.4 Issue and Consideration #4: Form

The London Plan

The London Plan encourages compact forms of development as a means of planning and managing for growth (7_, 66_). The London Plan encourages growing “inward and upward” to achieve compact forms of development (59_2, 79_). The London Plan accommodates opportunities for infill and intensification of various types and forms (59_4). To manage outward growth, The London Plan encourages supporting infill and intensification in meaningful ways (59_8). The London Plan also provides guidance on compatibility and fit with regards to form (Policy 953_).

Additionally, all planning and development applications must conform with the City Design policies of The London Plan and have regard for Our Move Forward: London's

Downtown Plan and the Downtown Design Manual (803_1). Building design that represents individual creativity and innovation will be encouraged to create landmarks, develop a distinctive character, and contribute to the city's image (803_4).

High and mid-rise buildings should be designed to express three defined components: a base, middle, and top (289_). High-rise buildings should be designed to minimize massing, shadowing, visual impact, and the obstruction of views from the street, public spaces, and neighbouring properties. To achieve these objectives, high rise buildings should take the form of slender towers and should not be designed with long axis where they create an overwhelming building mass (293_).

Analysis

The applicant has provided a development concept as part of a complete application to support and justify the form of development and its relationship to the area. The proposed form has made a strong effort to maintain a scale and rhythm that responds to the surrounding land uses, and that the location and massing of the proposed buildings is consistent with urban design goals of The London Plan.

Furthermore, consistent with The London Plan, the recommended intensification of the subject property would optimize the use of land and public investment in infrastructure in the area. Located within the downtown core of the City, the redevelopment and intensification of the subject lands for a high-rise mixed-use building would contribute to achieving a more compact form of growth and development than the 2-storey parking garage that currently occupies the site.

Base

High-rise buildings will incorporate a podium at the building base, or other design solutions to reduce the apparent height and mass of the building on the pedestrian environment, allow sunlight to penetrate in, and reduce wind impacts (929_). 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 (289_1).

The base of the tower has been designed with a 4 and 5-storey podium positioned and designed to address King Street and Waterloo Street, creating an animated and vibrant street frontage that interacts well with the public realm, and provides a strong and coherent pedestrian presence. The principal entrance to the building is provided at the corner of King Street and Waterloo Street. The site is also located behind the existing heritage building at 325 Dundas Street – The Delta Hotel. While the 4 and 5-storey podium is setback 5 metres on the north side from the Delta Armouries Hotel which results in a larger setback, it assists in continuing to showcase the hotel with the podium and setback. Staff support the scale and positioning of the podium relative to the existing heritage structure as well as the positioning of the tower component which respects The Delta Hotel along Waterloo Street and Dundas Street. A corner rendering is provided in Figures 8.



Figure 7: Tower base (corner view from King Street)



Figure 8: Tower base (corner view from Waterloo Street)

The base has been designed with materials that are in-keeping with and compliment the surrounding buildings including the heritage building with brick façade treatments and substantial glazing, displaying creativity and uniqueness in the details while complementing the surrounding area and land uses. The base not only adds to the unique character of the area but is also desirable and fulfills the planned function of the site with a building facade that is complementary to this corner creating a strong sense of place. On the rooftop of the podium amenity areas have been provided on all sides.



Figure 9: Level 6 Floor Plan which shows rooftop amenity areas of the podium

Staff recommend some design elements of the building to be further refined through the Site Plan review process to help create a more welcoming entrance to the development and enhance the overall design of the podium.

Middle

The middle should be visually cohesive with, but distinct from, the base and top (289_2). The middle of the building is the portion of the building above the podium-base and consists of the residential tower. The proposed tower floorplate is measured at approximately 1,013 square metres, constituting a slender tower. The positioning of the tower on the site will enable it to exist without imposing on the pedestrian experience and the existing heritage building along Dundas Street and offers spatial separation between the Delta Hotel. These setbacks are recommended in the by-law to ensure this separation is maintained. Details included in the design of the tower include balconies serving as private amenity spaces for residential units, which are defined by different colours and broken up along the façade to provide visual interest. Architectural design features enhance the downtown skyline and help break up the building mass.



Figure 10: Southwest Isometric Views



Figure 11: Northeast Isometric Views

Top

The top should provide a finishing treatment, such as roof or a cornice treatment, to hide and integrate mechanical penthouses into the overall building design (289_3). As the subject lands are located in a prominent site in the Downtown, the treatment of the building top will be highly visible and should contribute positively to the City’s skyline.

Consistent with the tall building design direction in Section 2.3 of the Downtown Design Manual, the building design includes a sculpted roof form that provides interest to the building and helps establish an attractive skyline within the downtown while creating a distinguishable built landmark. The top of the building also includes an integrated rooftop amenity areas for tenants. It is recommended to the Site Plan Approval Authority

that through future design refinements, any roof-top mechanical equipment be enclosed in a mechanical penthouse to ensure it is appropriately integrated into the design.

Staff commend the applicant for incorporating the following into the design of the site and buildings: material on the podium of the building that are in-keeping with the surroundings including the heritage building; a slender tower design; locating the tower portion of the building on the podium to increase the spatial separation between the tower and the Delta Hotel property; interesting architectural design features on the tower that will enhance the downtown skyline and break up the building mass; terraces overlooking the area and providing opportunity for activating these terraces with the proposed adjacent office/commercial uses.

The proposed development would be a landmark building at a prominent location in the Downtown. As shown in Figure 10, the proposed development provides a terminus vista at the corner of King Street and Waterloo Street with an attractive, slender tower and a base that complements the existing heritage building.



Figure 12: View of the proposed development at the intersection of King Street and Waterloo Street

The London Plan directs planning and design undertaken within the Downtown to place a priority on the pedestrian experience through site layout, building location, and a design that reinforces pedestrian comfort and safety (803_2). The evaluation of height and built form will consider access to sunlight by adjacent properties, wind impacts, view corridors, and potential impacts on public spaces and heritage properties located in close proximity to proposed development (802_3). 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 (803_4).

The Wind Study provided as part of the application outlines potential mitigation measures that will be reviewed and considered at a future Site Plan review stage. It is noted that some design considerations to assist in mitigating wind impacts have already been incorporated into the design, such as the use of a podium and the inclusion of balconies on the building façades. Additional consideration will be given to the common amenity terraces to include wind screens on Level 6 predicted to experience wind conditions suitable for sitting to the immediate north and south of the tower, Level 33 and 35 predicted to be suitable for sitting. This is included in the recommendation to be considered during the site plan review process.

As part of the complete application, a Shadow Study was provided to measure potential shadow impacts on adjacent properties. The slender design of the proposed tower assists in mitigating these impacts by reducing building mass and overall casting of shadows. Images from the Shadow Study demonstrating impacts at various times of day and year are contained in Appendix E.

Through the review of the initial proposal submission, Planning and Development staff and the Urban Design Peer Review Panel identified various considerations regarding the design of the development proposal. The applicant has taken these considerations into account along with other staff concerns and public concerns. Overall no major changes are being sought as part of this Zoning By-law amendment. Additional building and site design considerations will be implemented as part of the subsequent site plan application. Staff are satisfied that the Evaluation Criteria for Planning and Development Applications in the Our Tools part of The London Plan have been met through the recommended Zoning By-law amendment and can be further addressed through the site plan control review process.

The refinements illustrated on the site plan, and elevations provide certainty with respect to appropriate building location and height, amenity space, buffering, and design in order to establish suitable zoning regulations.

At the site plan control review stage, City staff will continue to refine these building and site design features with the applicant for implementation in the final approved drawings and development agreement, including:

- (i) To ensure sufficient amenity space has been provided, the amount of outdoor amenity space as presented on the architectural drawings should remain;
- (ii) To ensure the development represents uniqueness and individual creativity to develop a landmark and contribution, the proposed development should generally reflect the middle portion of the tower as submitted on the architectural drawings with materials and an architectural expression;
- (iii) To ensure the built form enhances the pedestrian environment, the ground floor and podium facades should provide depth and variation;
- (iv) Provide a variety of window glazing along the King Street ground floor façade to create visual interest and sightlines for sense of safety;
- (v) Design the space between the building and the street to have an urban character and an appropriate mix of hard- and softscape. Include street trees and design pedestrian routes to follow natural desire lines;
- (xiv) To ensure impact from wind, consideration will be given to the common amenity terraces to include wind screens on Level 6 predicted to experience wind conditions suitable for sitting to the immediate north and south of the tower, Level 33 and 35 predicted to be suitable for sitting;
- (xv) To mitigate the risk for indirect impacts on the built heritage resource – The Delta Armouries Hotel, a strategy to carry out a pre-condition survey, vibration monitoring and post-condition survey should be developed by a licensed engineer preferably with heritage experience;
- (xvi) The property should be subject to a vibration assessment prior to the commencement of construction to establish a “Zone of influence” and vibration monitoring and control system and policy be developed and implemented to ensure levels remain below the accepted threshold during all construction activities, to ensure there are no indirect impacts to adjacent structure, of particular note is the Delta Armouries Hotel at 325 Dundas Street. Vibration monitoring should be carried out by an individual with previous knowledge of heritage structures and the impact of vibration on heritage resources;
- (xvii) The recommendations outlined in the noise study including roadway and railway mitigation measures be implemented and a more detailed noise assessment will be required at the time of site plan review to determine specific noise control measures for the building itself.

These are the detailed matters summarized under clause b) of the staff recommendation for the Site Plan Approval Authority to consider through the site plan review process.

4.5 Issue and Consideration #5: Cultural Heritage

4.5.1 Heritage Designations

The subject site is adjacent to the Delta London Armouries designated under Part IV of the Ontario Heritage Act and is located in the Downtown Heritage Conservation District, designated under Part V of the Ontario Heritage Act. The Delta London Armouries was built in 1905 in the Romanesque Revival architectural style. The Armouries feature a solid red brick construction, with a stone base, cylindrical turrets, stylized archways over the windows, and a wide arch at the entrance, designed by Canadian architect David Ewart (Locorum, 2021). Armouries served the City for decades as a training facility and weapons storage for reserve and regular army units. The building opened as a 20-storey hotel in 1986. The building has historic and landmark significance within the City of London which is recognized through its current designation.



Figure 13 – Photo of the existing heritage building – The Delta Armouries Hotel

As part of the complete application, the applicant submitted a Heritage Impact Assessment (HIA) which was reviewed by the London Advisory Committee on Heritage (LACH) and City heritage planning Staff. Full comments from LACH and Staff are included in Appendix C. Through Staff's review of the HIA it is recognized that there are potential demolition and construction impacts as stated in the HIA. To mitigate these impacts considerations through site plan review have been included in the recommendation of this report.

Provincial Policy Statement, 2020

The PPS provides direction to conserve significant built heritage resources (2.6.1). Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property except 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 (2.6.3).

The London Plan

The City Building policies of The London Plan directs planning and development to: promote, celebrate, and raise awareness and appreciation of London's cultural heritage resources; conserve London's cultural heritage resources so they can be passed on to our future generations; and ensure that new development and public works are undertaken to enhance and be sensitive to our cultural heritage resources (554_1 to 3). Conservation of whole buildings on properties identified on the Register is encouraged and the retention of façades alone is discouraged (568_).

The Downtown Place Type of The London Plan provides direction for new development to be designed to provide for continuity and harmony in architectural style with adjacent uses that are of architectural or historical significance (803_3).

Downtown Heritage Conservation District Plan

One of the goals of the Downtown Heritage Conservation District Plan is to 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 (3.2.1). To achieve this, development should be distinguishable but also compatible with the heritage character of the Downtown Heritage Conservation District.

Sections 6.1.4.1 and 6.1.5 of the Downtown Heritage Conservation District Plan directs that new construction shall ensure the conservation of character-defining elements of the buildings it neighbours. New construction is to be made both physically and visually compatible with the historic place while not trying to replicate it in the whole and should be easily decipherable from its historic precedent while still complementing adjacent heritage buildings.

Staff are satisfied with the proximity of the proposed development to the heritage building at 325 Dundas Street and the ability of any development of this scale to be compatible.

Through the review of the proposed application Staff are of the opinion that positive design elements have been used to ensure the development is sensitive to the existing scale and character of the heritage building. There have been efforts in the design approach to be sensitive to heritage scale and character through a developed podium (bringing the scale down at grade to that of the heritage buildings), the use of an architectural vocabulary that relies on a base, mid-section and cap supporting a pedestrian scale at the street level and employing a sympathetic colour palette.



Figure 14 – Photo of the proposed development in context with the existing heritage building – The Delta Armouries Hotel

Heritage Impact Assessment(HIA)

Although staff are generally supportive of with the design elements and setbacks to ensure the development is sensitive to the existing Delta Armouries Hotel, the HIA indicated there was the potential direct impacts anticipated within the protected heritage

property due to demolition activities and indirect impacts to adjacent properties resulting in vibration impacts from construction activities. Therefore, certain criteria to support mitigation of these potential impacts have been included in the recommendation to be considered through the site plan review process.

Issue and Consideration #6: Emergency Communication and Path Loss

As part of a complete application, a path loss study was required to analyze the impact a new tower would have on the City of London existing public safety radio infrastructure. During the process, staff met with Emergency Communications to discuss impacts and potential mitigation measures that would uphold the integrity of the Emergency Communications system in a manner that is sensitive and accommodating to future development. These discussions are ongoing to determine a possible solution. A holding provision is being recommended at this time to ensure subsequent studies determine no impact exists or mitigation measures are identified and mutually agreed upon between the City and the developer.

h-()

Purpose: to ensure that the Municipal Emergency Communication System is functional and uninterrupted, the holding symbol shall not be deleted until subsequent studies determine no impacts exist or mitigation measures are identified and mutually agreed upon by the City and developer.

Conclusion

The recommended amendment is consistent with the Provincial Policy Statement, 2020 and conforms to the in-force policies of The London Plan, including but not limited to the Key Directions and Downtown Place Type policies. The recommended amendment facilitates the development of an underutilized site with an appropriate form of development at a prominent location in the Downtown.

The recommendation ensures the building form and design fits within the surrounding area while providing a high quality design standard. The recommended zone also provides for some flexibility for further refinements through the detailed design review at a future Site Plan review stage. The subject lands are situated in a location where intensification can be accommodated given the existing municipal infrastructure, location within the Downtown, and future/existing public transit facilities in the area.

Prepared by: Alanna Riley, MCIP, RPP
Senior Planner, Development Services

Reviewed by: Mike Corby, MCIP, RPP
Manager, Planning Implementation

Recommended by: Heather McNeely, MCIP, RPP
Director, Planning and Development

Submitted by: Scott Mathers, MPA, P.Eng.
Deputy City Manager, Planning and Economic Development

Copy:
Britt O'Hagan, Manager, Current Development
Michael Pease, Manager, Site Plans
Ismail Abushehada, Manager, Development Engineering

Appendix A

Bill No.(number to be inserted by Clerk's Office)
2023

By-law No. Z.-1-23_____

A by-law to amend By-law No. Z.-1 to
rezone an area of land located at 300-
320 King Street

WHEREAS Royal Host GP Inc. and Holloway Lodging has applied to
rezone an area of land located at 300-320 King Street, as shown on the map attached to
this by-law, as set out below;

AND WHEREAS this rezoning conforms to the Official Plan;

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

- 1) Schedule "A" to By-law No. Z.-1 is amended by changing the zoning applicable the
lands located at 300-320 King Street, as shown on the attached map comprising
part of Key Map No.(A107), from a holding Downtown Area (h-3*DA2*D350) Zone
TO a holding Downtown Special Provision (h-()*DA2(_)) Zone.
- 2) Section Number 20.4 of the Downtown (DA2) Zone is amended by adding the
following Special Provision:
DA2() 300- 320 King Street
 - a) Regulations for 300-320 King Street
 - i) Maximum density of 940 units per hectare
 - b) Regulations for the proposed new mixed-use building at 320 King
Street
 - i) Maximum height of 112 metres (35 storeys)
 - ii) 0% landscaped open space
 - iii) Maximum Lot Coverage of 97%
 - iv) Minimum North Yard Setback to Tower Component of
12.0metres
 - v) West Yard Setback to Tower Component of 15.0metres
 - vi) South Yard Setback to Tower Component of 5.0metres
 - vii) Minimum East Yard Setback to Tower Component of 5.0metres
- (3) Section Number 3.8 2) of the Holding "h" Zone is amended by adding the following
Holding Provision:
) h_

Purpose: to ensure that the Municipal Emergency Communication System is
functional and uninterrupted, the holding symbol shall not be deleted until
subsequent studies determine no impacts exist or mitigation measures are
identified and mutually agreed upon by the City and developer.

Permitted Interim Uses: Permitted uses within existing buildings.

The inclusion in this By-law of imperial measure along with metric measure is for the purpose of convenience only and the metric measure governs in case of any discrepancy between the two measures.

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

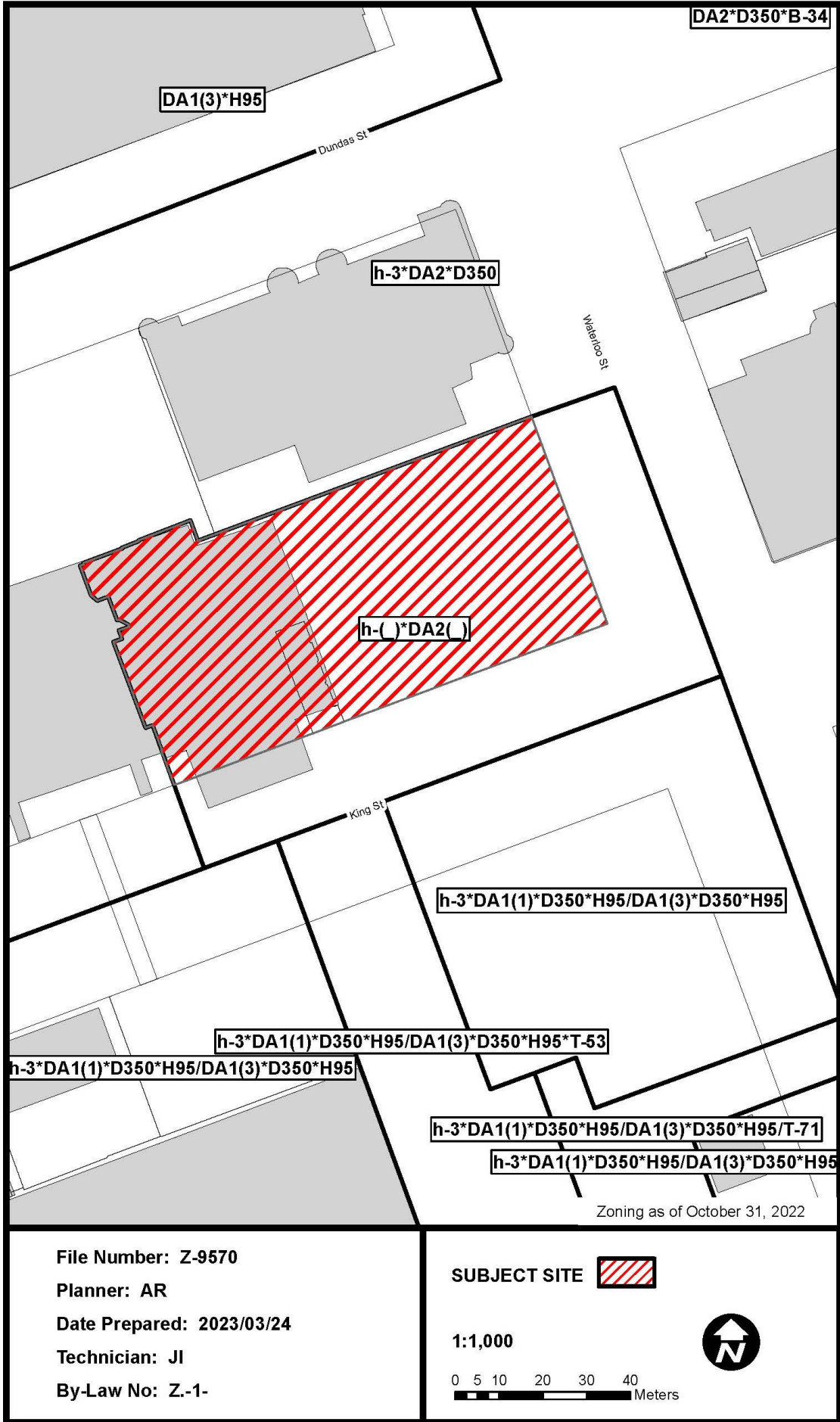
PASSED in Open Council on April 25, 2023.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – April 25, 2023.
Second Reading – April 25, 2023.
Third Reading – April 25, 2023.

AMENDMENT TO SCHEDULE "A" (BY-LAW NO. Z-1)



Appendix B – Public Engagement

Community Engagement

Notice of Application:

On December 9, 2022, Notice of Application was sent to property owners in the surrounding area. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on December 9, 2022. A “Planning Application” sign was posted on the site.

Responses:

5 replies were received

Nature of Liaison:

The purpose and effect of this zoning change is to permit the development of a 35-storey, 435-unit mixed-use building with a central residential tower, and a 4 and 5-storey podium across the entire site consisting of commercial, a parking structure, bicycle storage and residential units. A Site Plan Control application is currently being processed to permit the conversion of part, or all, of the existing hotel units to residential units. A density of 595 units per hectare (uph) is proposed for the development, resulting in a total site density of approximately 940 uph if the existing hotel is completely converted to apartments. Possible change to Zoning By-law Z.-1 FROM a holding Downtown Area (h-3*DA2*D350) Zone TO a Downtown Area Special Provision (DA2()) Zone. Special provisions would permit no landscaped open space requirement, a maximum building height of 111m, a maximum lot coverage of 97%, and a maximum density of 940 units per hectare.

It should be noted that the Site Plan Control application mentioned in the notice of application has been cancelled.

Letter and Publication in “The Londoner”

Written	Telephone
Anna Maria Valastro	Anna Maria Valastro
	Rob McGeary
Teresa Novick	
Alma Oliarnyck	
Lori DaSilva – General Manger – RBC Place	

Hello Alanna,

I think the proposal for 300-320 King St is fantastic. We need more buildings like this in the core. Not sure what the limit is for height/number of storeys, but the more the better. Allow the builder more floors to accommodate more affordable units. We need to use the land in the core rather than continuing to build out.

Regards,

Teresa Novick

To Alanna Riley and David Ferreira and Mary Ann Hodge

I am attaching my letter of objection in the hopes that it will be taken seriously regarding a 35-storey 435 unit mixed-use building proposal. I am aware that this may be a David and Goliath situation. This is not a letter of 'Not In My Front Yard' but rather a letter of concerns for the overload of towers, for the overload of intensification, for the overload of traffic on already busy roads. The traffic lights are not synchronized sufficiently to handle more cars and pedestrians effectively. The proposed height of this

building is out of sync with the neighbourhood. There are already cranes in the sky west of Wellington/Dundas with more residential towers being built. As well as to the south where the old hospital was located.

Alma Oliarnyck



Tuesday, January 3, 2023

Alanna Riley
Planning & Development
City of London
300 Dufferin Avenue, 6th Floor
London, ON N6A 4L9
Ref #Z-9570

Dear Ms. Riley,

RBC Place London, operated by the London Convention Centre Corporation under a By Law established by the City of London, was built to host conventions, conferences and multi-day events driving economic impact for London. While RBC Place London was built to host the meeting aspect of these multi-day events, local hotels are vital partners providing the accommodations and are direct economic benefactors.

The Doubletree by Hilton Hotel, located at 300 King Street, is physically connected to RBC Place London via a pedway across King Street. Should a zoning by-law amendment permitting the "conversion of part, or all, of the existing hotel units to residential units" be approved, the City of London will not be a viable competitive community in the attraction of conventions, conferences, and multi-day events. This directly means that the City of London, will no longer be able to host events like the Association of Municipalities of Ontario booked in London, August 2023, which will generate approximately 6,000 room nights for the community and \$2.41 million in direct economic spend during a need period. London would not be able to bid and host events like the Tim Hortons Brier, booked March 2023, with a forecasted economic impact for the community of \$8-10 million. The hosting of these types of events brings the world to London. Without the connected accommodation partner, RBC Place London is no longer a convention hosting venue.

Currently the Doubletree by Hilton Hotel is London's largest hotel with 323 guestrooms and the only hotel directly connected via a pedway to RBC Place London. Should a site plan application to convert "part, or all, of the existing hotel units to residential units" be approved, the City of London is publicly making the decision to no longer be competitive in the convention or multi-day event hosting market. This decision needs to be elevated to a full strategic review as currently, the importance of driving economic impact through the hosting of these events is included in the City of London Strategic Plan supporting economic growth and adding vibrancy to downtown London.

rbclacelondon.com



RBC PLACE LONDON

RBC Place London fully supports the development of a new mixed-use building on the site of 300-320 King Street recognizing the need and importance of, additional residential units in downtown London.

RBC Place London management respectfully requests that the application to convert all existing hotel rooms at this location be fully evaluated and reviewed at the highest community level. The community wide impact of such a conversion of all existing hotel rooms at 300 King Street, would greatly impact London's ability to continue to participate in multi-day event hosting. This decision needs to go beyond a zoning by-law amendment review process to a strategic review for the City as the impact will be community wide.

Lori Da Silva
General Manager & CEO
RBC Place London

c.c. Councillor David Ferreria
RBC Place London Board of Directors
Cheryl Finn, General Manager Tourism London

RBC Place London
300 York Street
London, ON N6B 1P8

519-661-6200
1-800-203-1992

rbcplacelondon.com

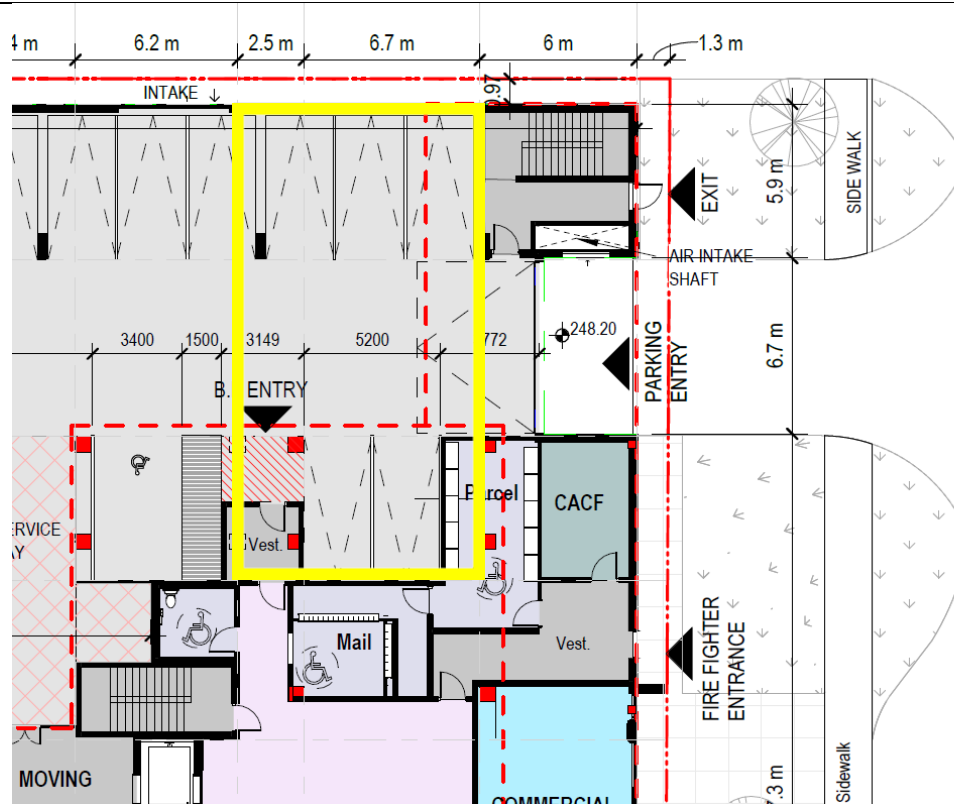
Agency/Departmental Comments

Ontario Lands

It is Enbridge Gas Inc.'s request that as a condition of final approval that the owner/developer provide to Enbridge the necessary easements and/or agreements required by Enbridge for the provision of gas services for this project, in a form satisfactory to Enbridge.

Site Plan

- 1. Relocate the commercial parking stalls to the ground floor parking area
 2. Remove the parking stalls located directly at the parking entry. If vehicles are exiting while others are coming in, this can create some issue



3. Barrier-free parking is based on the number of provided parking stalls. Based on the provided 318 stalls, 9 barrier-free stalls are required. Revise the plans accordingly to accommodate the required number of barrier-free stalls and provide a breakdown of the Type A and Type B provided stalls. Dimension the proposed barrier-free stalls.
4. It is noted that while tandem is permitted, the spaces only count as one (1) towards the overall parking count.
5. Ensure all parking garage exits lead to a sidewalk. One of the exists along Waterloo Street towards the rear of the site exit onto landscaping.
6. Clarify the location of outdoor amenity space for the building. There appears to be a smaller terrace on Level 35 however, amenity space is required to be of an appropriate size and scale based on the proposed building (approx. 5m² per residential unit)
7. Dimension the standard parking stalls, specifically the width, within the underground parking garage.
8. Staff have concerns with the proposed garbage/recycling room and moving area for vehicle maneuvering (including a tight turning radii). As per the Site Plan Control By-law, an external garbage pad for collection day is required.
9. Consider relocating the bicycle parking to the ground floor or Level 2 – Podium. While the current location works, it requires residence to go down 3-4 levels before reaching the ground floor.

Urban Design

The proposed zoning provisions for the property will need to address the following concerns:

- The applicant is commended for designing the building to include active uses such as common amenity rooms and commercial spaces on the street-facing portions of the podium to activate the street edge [TLP_285_].
 - Include provisions for ground floor uses, entrance locations and a high proportion of vision glazing (minimum 60%) for ground floor facades.
 - Include provisions for a 4.5m ground floor height to facilitate commercial uses.
- The applicant is commended for providing a podium design on the base of the building which breaks up the mass along King Street and Waterloo Street and provides a step-back to reduce wind impacts and appear human-scale at street level.
 - Ensure zoning provisions are included for step-backs along King Street and Waterloo Street and associated podium height for each frontage.
- Limit the tower portion of the building in order to reduce the over massing of the building and the "slab-like" appearance of the towers [TLP 293_].

- Reduce the east-west length of the tower to lessen the perceived mass from the pedestrian environment to allow sunlight and reduce wind impacts [TLP 292_]. Include provisions for a maximum east-west tower width, targeting a maximum 35m wide. This will allow for greater separation between the existing hotel building and this new tower.
- Include provisions for a maximum floor-plate size to reduce shadow impacts and facilitate a point-tower configuration. A target of 750m square as a maximum tower floorplate is appropriate for the Downtown context.
- To facilitate the above changes, consider redistributing the units from the west portion of the tower to create a more square-shaped, point tower. Units could also be redistributed into the podium of the building.
- Where the tower can be reduced in length towards the east, provide expanded amenity areas to serve as common outdoor usable space. Provide shade structures, weather protection and screening where appropriate.
- Include zoning provisions to provide a separation distance of at least 25 metres between the proposed tower and the existing hotel building on 300 King Street to maximize access to sunlight and sky view, and privacy for residents.

The following details will need to be addressed through the subsequent Site Plan process:

- Design the middle portion of the tower with materials and an architectural expression that represents uniqueness and individual creativity to develop a landmark and contribution to develop a distinctive character to the downtown and the city [TLP 803_ 7].
- Articulate the ground floor and podium facades to provide depth and variation in the built form to enhance the pedestrian environment.
 - Provide a variety of durable, and tactile building materials such as different types of brick, wood with textures on the ground floor to provide defined separation of spaces and uses while also enhancing the pedestrian experience at walking speed for visual stimulation [TLP 301_], [TLP 302_].
 - Include weather protection and pedestrian-scale signage for both the commercial units and the residential entrance.
- Provide a variety of window glazing along the King Street ground floor façade to alleviate the elongated blank wall and create visual interest and sightlines for sense of safety [TLP 803_ 3].
 - Provide window glazing and a separate cyclist entrance on King Street for the bike storage room for clear sightlines and façade activity.
 - Provide some window glazing along King Street on the portion of the wall abutting the ground floor parking garage to reduce the blank wall.

Design the space between the building and the street to have an urban character and an appropriate mix of hard- and softscape. Include street trees and design pedestrian routes to follow natural desire lines.

UDPRP

- While the Panel generally supports the increased density and proposed land use for the site, the Panel recommends the applicant revisit the Panel at the Site Plan stage for further design review and comments.
- The Panel notes that the development is situated at a strategically important downtown location. With the proposed height and massing, the development will dominate the skyline and streetscape for a long time. However, the Panel has concerns with the floor plate size and tower articulation and has the following recommendations:
 - i. Reduce the tower footprint to create a more slender and articulated tower. Consider an increase in height to offset lost area.
 - ii. While there are some step backs and changes of plane on the tower elevations, consider introducing additional step backs, particularly at the South-West and

North-East corners of the tower. Align these step backs with the height of the neighbouring hotel towers.

iii. Revisit the proximity of the proposed tower to the neighbouring hotel towers and ensure a 25m separation distance is maintained.

- While the above grade parking structure is located away from the main elevations and street frontages, some 'blank' elevations will still be visible from Waterloo Street and Dundas Street. Consider introducing screens to allow air and openings in the facades to provide further articulation. In addition, more material differentiation and/or artistic murals could help these faces become more friendly and active backdrops to the surrounding public realm.
- The Panel recommends studying the interface between the proposed development and the abutting Hilton Hotel and Delta Hotel. Considerations should be given to establishing an at-grade mid-block pedestrian connection between the two hotels to increase overall permeability.
- The Panel notes that the 5th and 6th floor roofs will be highly visible to residents in the tower and should incorporate landscaping elements, green roofs, and/or outdoor amenity functions. To that end, consider relocating the indoor amenity to the 5th or 6th floor to allow for direct access to outdoor space.
- The Panel has concerns that two elevators will not sufficiently service 435 units and recommends this be revisited.
- The Panel appreciates the active frontage along King Street and Waterloo Street, however the CACF room breaks this continuity. Consider relocating the CACF room away from the Waterloo Street frontage and increase the size of the residential lobby.
- The Panel notes that the podium requires a strong civic gesture for this prominent downtown location. Consider revisiting the scale of the residential fenestration to create larger openings and further enhance the commercial component to increase animation along King Street.
- The Panel suggests some simplification of the podium and tower in terms of materiality and colour palette.

Concluding comments:

This UDPRP review is based on City planning and urban design policy, the submitted brief, and the noted presentation. It is intended to inform the ongoing planning and design process.

The overall development of this site as proposed could benefit from further analysis and is recommended to return to the Panel at or prior to Site Plan Submission.

Consider the panel's recommendations as noted above for future refinements to the project in the interest of enhanced experience of the public realm and for current and future residents. The Panel looks forward to the proponent's response.

London Hydro

- London Hydro has no objection to this proposal or possible official plan and/or zoning amendment. Any new or relocation of the existing service will be at the expense of the owner.
- London Hydro has no objection to this proposal or possible official plan and/or zoning amendment. However, London Hydro will require a blanket easement.

Landscape Architect

The application proposes the removal of City of London trees growing in the King Street and Waterloo Street boulevards. Their removal will be coordinating through Site Plan application process. The applicant will need to provide receipt for monies paid to the city for the removal of the 11 City owned trees to the Site Plan file handler. Only City forces can remove or injure City trees

Heritage



MEMO

To: Alanna Riley, Senior Planner
From: Laura E. Dent, Heritage Planner
Date: January 26, 2023
Re: **Heritage Impact Assessment –
Current Application**
300-320 King Street (Z-9570)
Heritage Comments

This memo is to confirm that heritage planning staff has reviewed the following heritage impact assessment and finds it sufficient to fulfill heritage planning conditions for the current application (Z-9570):

- Zelinka Priamo (2022, November 17). *Cultural Heritage Impact Assessment, 200 Albert Street, London Ontario.*

Note that at its January 11, 2023, meeting, the Community Advisory Committee on Planning (CACP) reviewed the Notice of Planning Application and Cultural Heritage Impact Assessment, and “is generally supportive of this application but would like to see additional analysis and/or renderings as part of a heritage alteration permit application that addresses conservation of the Dundas Street view of the Armouries building which has been identified as a significant heritage attribute in the Downtown Heritage Conservation District.”

Heritage Matters and Mitigation

Staff supports the conclusions of the heritage impact assessment (HIA) that the proposed development “has the potential to result in direct and indirect impacts to the identified heritage resources.” (p19) Specifically, the HIA determined that there are “direct impacts anticipated within a protected heritage property due to demolition activities,” and well as “potential indirect impacts to adjacent properties resulting in vibration impacts from construction activities.” (p1)

Given the presence of cultural heritage resources which have the potential to be affected by the proposed development, the heritage impact assessment (HIA) recommends that:

- a) *development and construction standards be applied to include monitoring of construction/demolition impacts.* (p19)

Heritage planning staff acknowledges the stated mitigation response to potential construction impacts in the HIA, but further RECOMMENDS that the following specific wording BE SUPPORTED as part of the ZBA (Z-9570) and implemented during site plan approval.

- b) Proposed mitigation measures should include buffer zones, site plan control, and other planning mechanisms.
- c) Proposed development is within 50 metres of built heritage resources, and they are at risk for indirect impacts resulting from demolition and construction-related ground vibration; of particular note is the Delta Armouries Hotel at 325 Dundas Street, a significant built heritage resource. To mitigate this risk, a strategy to carry out a pre-condition survey,

vibration monitoring, and post-condition survey should be developed by a licensed engineer preferably with heritage experience.

- d) The property should be subject to a vibration assessment prior to the commencement of construction to establish a "zone of influence" and a vibration monitoring and control system and policy be developed and implemented to ensure levels remain below the accepted threshold during all construction activities, to ensure there are no indirect impacts to adjacent structures; of particular note is the Delta Armouries Hotel at 325 Dundas Street. Vibration monitoring should be carried out by an individual with previous knowledge of heritage structures and the impact of vibration on heritage resources.

Other Matters

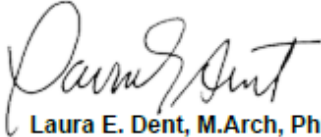
- e) A request for demolition and demolition approval by Council for the parking garage at 320 King Street will BE REQUIRED for site plan approval (SPA).
- f) Heritage alteration permit (HAP) approval for the proposed development will BE REQUIRED for site plan approval and prior to the issuance of a building permit.

As part of a HAP submission and approval, the applicant should review the policies of the *Downtown Heritage Conservation District Plan (2013)* and address how the proposal complies with the policies and guidelines of the District Plan, specifically: 6.1.4 New Construction; 6.1.4.1 Principles; 6.1.4.2 Infill; 6.1.5 Alterations and Renovations. A description of the proposal notes that "the design of the new development will provide for continuity and harmony in architectural style with adjacent uses that are of architectural or historical significance." This approach to compatibility within the Downtown Heritage Conservation District is encouraged, and should be further developed in detail as part of HAP approval regarding how these concepts are implemented.

Finally, the impact of views on and surrounding the subject site are an important consideration particularly that of the adjacent Delta Armouries Hotel (Downtown HCD, 6.2.7). Elevations and renderings submitted as part of the HAP should clearly illustrate the surrounding context and potential impacts, and how these are mitigated by the proposed approach to design.

Based on the review of the heritage impact assessment (HIA), heritage staff is satisfied that the adverse indirect impacts to the surrounding adjacent properties will be minimal. Along with more detailed mitigation measures suggested by heritage planning staff – and noting that demolition and heritage alteration permit approval will be required – the HIA can be accepted to meet heritage planning conditions for zoning approval (Z-9570).

Sincerely,



Laura E. Dent, M.Arch, PhD, MCIP, RPP
Heritage Planner
Community Planning, Urban Design and Heritage
Planning & Development

Ecology

No issues

Parks

- Parkland dedication is required in the form of cash in lieu, pursuant to By-law CP-9 and will be finalized at the time of site plan approval.

Engineering

Comments to the Rezoning Application:

- The proposed 940UPH far exceeds what the City previously allocated or contemplated for the subject lands for the RT project. The BRT project team will need to be contacted to address this change and to ensure the drainage area plan and design sheet are updated accordingly. Please reach out to Cailean Toner (ctoner@london.ca).

The following items are to be considered during a future site plan application stage:

- A detailed noise report will need to be submitted at the time of site plan as recommended by the zoning noise report. Additionally, the report is to address stationary noise impacts from the mechanical equipment on the surrounding land uses.

Wastewater:

- The subject lands are part of the East London Link and Infrastructure Improvements Phase 1 sanitary area plan allocated 560pp/ha (drawings issued for construction in 2022). The proposed is for a 35-storey high rise with 435 units on the existing parking lot, with the Hilton Hotel accepted as 248 residential units.

- **Stormwater:**

Specific comment for this site

- The site is tributary to future storm sewers on King Street, as per City as-constructed 23337 & 23338, at C=0.90. Anticipated construction is tentatively scheduled for 2023. As per the attached as-cons, there is no capacity for the development within the storm sewers on Waterloo Street.
- Should the developer wish to proceed ahead of the future capital sewer project the developer is to provide rationale on how the site can be serviced for stormwater management while achieving both Subwatershed requirements as well as City of London Standards.
- The Developer shall be required to provide a Storm/Drainage Servicing Report demonstrating that the proper SWM practices will be applied to ensure on-site controls are designed to reduce/match existing peak flows from the 2 through 100 year return period storms.
- As per the City of London's Design Requirements for Permanent Private Systems, the proposed application falls within the Central Subwatershed (case 4), therefore the following design criteria should be implemented:
 - the flow from the site must be discharged at a rate equal to or less than the existing condition flow;
 - the discharge flow from the site must not exceed the capacity of the stormwater conveyance system;
 - the design must account the sites unique discharge conditions (velocities and fluvial geomorphological requirements);
 - "normal" level water quality is required as per the MOE guidelines and/or as per the EIS field information; and
 - shall comply with riparian right (common) law.
The consultant shall update the servicing report and drawings to provide calculations, recommendations and details to address these requirements.
- Additional SWM related comments will be provided upon future review of this site.

General comments for sites within Central Thames Subwatershed

- The subject lands are located within a subwatershed without established targets. City of London Standards require the Owner to provide a Storm/Drainage Servicing Report demonstrating compliance with SWM criteria and environmental targets identified in the Design Specifications & Requirements Manual. This may include but not be limited to, quantity control, quality control (70% TSS), erosion, stream morphology, etc.
- The Developer shall be required to provide a Storm/drainage Servicing Report demonstrating that the proper SWM practices will be applied to ensure the maximum permissible storm run-off discharge from the subject site will not

exceed the peak discharge of storm run-off under pre-development conditions up to and including 100-year storm events.

- The Owner agrees to promote the implementation of SWM Best Management Practices (BMP's) within the plan, including Low Impact Development (LID) where possible, to the satisfaction of the City Engineer. It shall include water balance.
- The owner is required to provide a lot grading plan for stormwater flows and major overland flows on site and ensure that stormwater flows are self-contained on site, up to the 100-year event and safely conveys up to the 250 year storm event, all to be designed by a Professional Engineer for review.
- The Owner shall allow for conveyance of overland flows from external drainage areas that naturally drain by topography through the subject lands.
- Stormwater run-off from the subject lands shall not cause any adverse effects to adjacent or downstream lands.
- An erosion/sediment control plan that will identify all erosion and sediment control measures for the subject site and that will be in accordance with City of London and MECP (formerly MOECC) standards and requirements, all to the specification and satisfaction of the City Engineer. This plan is to include measures to be used during all phases of construction. These measures shall be identified in the Storm/Drainage Servicing Report.

Water:

- - Water is available to the subject site via the municipal 300mm PVC watermain on Waterloo Street or the municipal 300 mm DI watermain on King Street.
 - All comments will be addressed through SPA.
 - Due to the demolition of the existing parking structure, any existing water services are to be decommissioned as per City Standards (cut and capped at the main).
 - Due to the number of proposed units, water looping is required as per City Standard 7.9.5.
 - A water servicing report will be required addressing domestic water demands, fire flows, water quality and future ownership of the development.
 - Water servicing shall be configured in a way to avoid the creation of a regulated drinking water system.
 - Further comments will be provided during site plan consultation/application for the proposed development.

•
• **Transportation:**

Comments related to the TIA to be completed at the time of Site Plan:

- In general, proposed Traffic Impact Assessment is acceptable for the ZBA Application;
- Further, the TIA recommended two-way left-turn lane along Waterloo St. A design was also provided based on the 95th percentile queuing analysis, however more analysis is required;
- It is recommended to provide sim-traffic analysis for that two-way left-turn lane;

•
Rapid Transit Comments:

- King Street is a Rapid Transit (RT) Corridor. Phase 1 construction of the East Corridor of the RT system between Wellington Street and Lyle Street is planned for 2022.
- The Issued For Tender (IFT) drawings of the RT system in the vicinity of this property are available for incorporation into the proposed development. For a copy, contact Juan C. Chamorro of the Transportation Planning & Design Division.
- The proposed development concept plan should show the RT IFT system design noting the PDC locations and layby configuration. Coordination of the siteworks adjacent to RT lanes should be done with Major Projects to ensure no impacts to RT.

- The north and south curb lanes on King Street are proposed to be a RT/bus-only lane; all other vehicles will be prohibited from using this lane, except for ingress and egress turning movements. Any vehicular stopping, loading or pick-up/drop-offs will be strictly prohibited in this RT lane in the vicinity of this property.
- The Applicant should ensure that there will be no vehicle queuing accessing the parking garage off King Street at any time, as blocking the RT lane would compromise the operation of the RT.

CN Rail

1. The Owner shall engage a consultant to undertake an analysis of noise. Subject to the review of the noise report, the Railway may consider other measures recommended by an approved Noise Consultant.

2. The following clause should be inserted in all development agreements, offers to purchase, and agreements of Purchase and Sale or Lease of each dwelling unit within 300m of the railway right-of-way:

“Warning: Canadian National Railway Company or its assigns or successors in interest has or have a right-of-way within 300 metres from the land the subject hereof. There may be alterations to or expansions of the railway facilities on such rights-of-way in the future including the possibility that the railway or its assigns or successors as aforesaid may expand its operations, which expansion may affect the living environment of the residents in the vicinity, notwithstanding the inclusion of any noise and vibration attenuating measures in the design of the development and individual dwelling(s). CNR will not be responsible for any complaints or claims arising from use of such facilities and/or operations on, over or under the aforesaid rights-of-way.”

3. The Owner shall through restrictive covenants to be registered on title and all agreements of purchase and sale or lease provide notice to the public that the noise isolation measures implemented are not to be tampered with or altered and further that the Owner shall have sole responsibility for and shall maintain these measures to the satisfaction of CN.

4. The Owner shall enter into an Agreement with CN stipulating how CN's concerns will be resolved and will pay CN's reasonable costs in preparing and negotiating the agreement.

5. The Owner shall be required to grant CN an environmental easement for operational noise and vibration emissions, registered against the subject property in favour of CN.

CN anticipates the opportunity to review a N&V study taking into consideration the CN development guidelines.

Comment:
While the Panel generally supports the increased density and proposed land use for the site, the Panel recommends the applicant revisit the Panel at the Site Plan stage for further design review and comments.
Applicant Response:
It is not customary for an applicant to return to the Panel, nor do the recommendations made by the Panel justify another review. The changes that have been made are generally technical in nature with no significant changes made to the appearance of the building.]

Comment:
The Panel notes that the development is situated at a strategically important downtown location. With the proposed height and massing, the development will dominate the skyline and streetscape for a long time. However, the Panel has concerns with the floor plate size and tower articulation and has the following recommendations: i. Reduce the tower footprint to create a more slender and articulated tower. Consider an increase in height to offset lost area. ii. While there are some step backs and changes of plane on the tower elevations, consider introducing additional step backs, particularly at the South-West and North-East corners of the tower. Align these step backs with the height of the neighbouring hotel towers. iii. Revisit the proximity of the proposed tower to the neighbouring hotel towers and ensure a 25m separation distance is maintained.
Applicant Response:
The building, as proposed, is 35-storeys and the maximum height permitted by The London Plan and, as such, an increase in height is not contemplated without an Official Plan Amendment, which is beyond the scope of this ZBA application. Additional step backs were considered; however, the net-unit loss was too significant. Sufficient step backs have been provided at the podium levels as per The London Plan guidelines. A 21.2m separation distance is provided, which is considered to be sufficient considering the adjacent hotel façade is primarily blank.

Comment:
While the above grade parking structure is located away from the main elevations and street frontages, some 'blank' elevations will still be visible from Waterloo Street and Dundas Street. Consider introducing screens to allow air and openings in the facades to provide further articulation. In addition, more material differentiation and/or artistic murals could help these faces become more friendly and active backdrops to the surrounding public realm.
Applicant Response:
Openings for air intakes have been added to the north and west façades. Artistic murals could be considered at a future date.

Panel

The Panel recommends studying the interface between the proposed development and the abutting Hilton Hotel and Delta Hotel. Considerations should be given to establishing an at-grade mid-block pedestrian connection between the two hotels to increase overall permeability.

Applicant Response:

The Hilton Hotel at 300 King Street and the proposed development at 320 King Street have the same land owner. A connection is provided between the Hilton Hotel and the proposed building at the 4th floor, as shown on the revised Site Plan. An indoor mid-block connection already exists between Dundas Street and King Street.

Comment:

The Panel notes that the 5th and 6th floor roofs will be highly visible to residents in the tower and should incorporate landscaping elements, green roofs, and/or outdoor amenity functions. To that end, consider relocating the indoor amenity to the 5th or 6th floor to allow for direct access to outdoor space.

Applicant Response:

Indoor amenity space has been relocated on the 5th floor and provides direct access to the outdoor space. The 5th and 6th floor roofs will incorporate landscaping elements and outdoor amenity functions as appropriate.

Comment:

The Panel has concerns that two elevators will not sufficiently service 435 units and recommends this be revisited.

Applicant Response:

An additional elevator has been provided, for a total of three elevators to service the building.

Comment:

The Panel appreciates the active frontage along King Street and Waterloo Street, however the CACF room breaks this continuity. Consider relocating the CACF room away from the Waterloo Street frontage and increase the size of the residential lobby.

Applicant Response:

The CACF room has been relocated away from the Waterloo Street frontage.

Comment:

The Panel notes that the podium requires a strong civic gesture for this prominent downtown location. Consider revisiting the scale of the residential fenestration to create larger openings and further enhance the commercial component to increase animation along King Street.

Applicant Response:

The commercial component of the development provides significant glazing, with the podium of the proposed building balanced with brick and punched windows in order to align with the historical Delta Armouries building which has a greater percentage of brick to glass.

Comment:

The Panel suggests some simplification of the podium and tower in terms of materiality and colour palette.

Applicant Response:

The podium provides two colours of the same material; brick with precast white panels that align with the stone on the Delta Armouries, and glazing. The tower provides a white base panel with grey fenestration, and glazing. There is little opportunity to reduce the materiality and colour palette further.

Appendix C – Climate Emergency

On April 23, 2019, Council declared a Climate Emergency. Through this declaration the City is committed to reducing and mitigating climate change. The following are characteristics of the proposed application related to the City's climate action objectives:

Infill and Intensification

Located within the Built Area Boundary: **Yes**
Located within the Primary Transit Area: **Yes**
Net density change: 590 uph
Net change in affordable housing units: **N/A**

Complete Communities

New use added to the local community: **Yes**
Proximity to the nearest public open space: 186m
Proximity to the nearest commercial area/use: 30m
Proximity to the nearest food store: 750m
Proximity to nearest primary school: 2.4km
Proximity to nearest community/recreation amenity: 20m
Net change in functional on-site outdoor amenity areas: **N/A**

Reduce Auto-dependence

Proximity to the nearest London Transit stop: 10m
Completes gaps in the public sidewalk network: **Yes**
Connection from the site to a public sidewalk: **Yes**
Connection from the site to a multi-use pathway: **N/A**
Site layout contributes to a walkable environment: **Yes**
Proximity to nearest dedicated cycling infrastructure: 10m
Secured bike parking spaces: **N/A**
Secured bike parking ratio: **N/A**
New electric vehicles charging stations: **Unknown**
Vehicle parking ratio: **0.5 spaces per unit for residential units**

Environmental Impacts

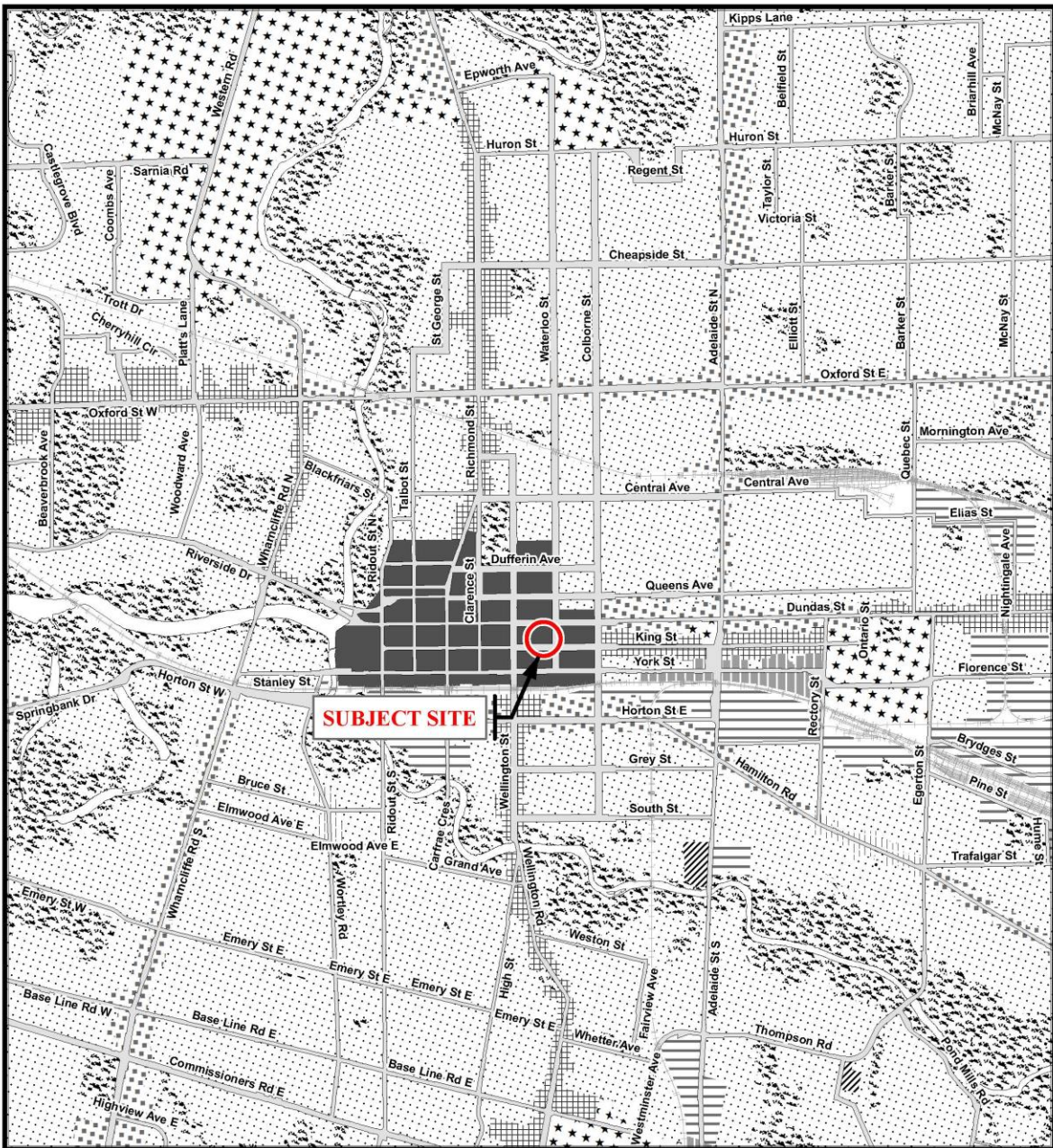
Net change in permeable surfaces: **No**
Net change in the number of trees: unknown
Tree Protection Area: **No**
Landscape Plan considers and includes native and pollinator species: **N/A**
Loss of natural heritage features: **No**
Species at Risk Habitat loss: **No**
Minimum Environmental Management Guideline buffer met (Table 5-2 EMG, 2021): **N/A**

Construction

Existing structures on site: **Yes**
Existing structures repurposed/adaptively reused: **No**
Green building features: **Unknown**
District energy system connection: **No**

Appendix D – Relevant Background

The London Plan

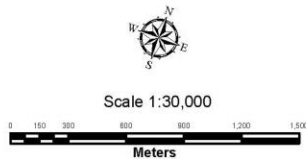


Legend

Downtown	Future Community Growth	Environmental Review
Transit Village	Heavy Industrial	Farmland
Shopping Area	Light Industrial	Rural Neighbourhood
Rapid Transit Corridor	Future Industrial Growth	Waste Management Resource Recovery Area
Urban Corridor	Commercial Industrial	Urban Growth Boundary
Main Street	Institutional	
Neighbourhood	Green Space	

This is an excerpt from Planning & Development's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

CITY OF LONDON
Official Plan
LONDON PLAN MAP 1
- PLACE TYPES -
 PREPARED BY: Planning & Development



File Number: Z-9570
Planner: AR
Technician: JI
Date: 2022/11/24

Zoning By-law Z.1- Zoning Excerpt



COUNCIL APPROVED ZONING FOR THE SUBJECT SITE: h-3*DA2*D350

1) LEGEND FOR ZONING BY-LAW Z-1

- | | |
|---|-----------------------------------|
| R1 - SINGLE DETACHED DWELLINGS | RF - REGIONAL FACILITY |
| R2 - SINGLE AND TWO UNIT DWELLINGS | CF - COMMUNITY FACILITY |
| R3 - SINGLE TO FOUR UNIT DWELLINGS | NF - NEIGHBOURHOOD FACILITY |
| R4 - STREET TOWNHOUSE | HER - HERITAGE |
| R5 - CLUSTER TOWNHOUSE | DC - DAY CARE |
| R6 - CLUSTER HOUSING ALL FORMS | |
| R7 - SENIOR'S HOUSING | OS - OPEN SPACE |
| R8 - MEDIUM DENSITY/LOW RISE APTS. | CR - COMMERCIAL RECREATION |
| R9 - MEDIUM TO HIGH DENSITY APTS. | ER - ENVIRONMENTAL REVIEW |
| R10 - HIGH DENSITY APARTMENTS | |
| R11 - LODGING HOUSE | OB - OFFICE BUSINESS PARK |
| DA - DOWNTOWN AREA | LI - LIGHT INDUSTRIAL |
| RSA - REGIONAL SHOPPING AREA | GI - GENERAL INDUSTRIAL |
| CSA - COMMUNITY SHOPPING AREA | HI - HEAVY INDUSTRIAL |
| NSA - NEIGHBOURHOOD SHOPPING AREA | EX - RESOURCE EXTRACTIVE |
| BDC - BUSINESS DISTRICT COMMERCIAL | UR - URBAN RESERVE |
| AC - ARTERIAL COMMERCIAL | |
| HS - HIGHWAY SERVICE COMMERCIAL | AG - AGRICULTURAL |
| RSC - RESTRICTED SERVICE COMMERCIAL | AGC - AGRICULTURAL COMMERCIAL |
| CC - CONVENIENCE COMMERCIAL | RRC - RURAL SETTLEMENT COMMERCIAL |
| SS - AUTOMOBILE SERVICE STATION | TGS - TEMPORARY GARDEN SUITE |
| ASA - ASSOCIATED SHOPPING AREA COMMERCIAL | RT - RAIL TRANSPORTATION |
| OR - OFFICE/RESIDENTIAL | "h" - HOLDING SYMBOL |
| OC - OFFICE CONVERSION | "D" - DENSITY SYMBOL |
| RO - RESTRICTED OFFICE | "H" - HEIGHT SYMBOL |
| OF - OFFICE | "B" - BONUS SYMBOL |
| | "T" - TEMPORARY USE SYMBOL |

CITY OF LONDON

PLANNING SERVICES / DEVELOPMENT SERVICES

ZONING BY-LAW NO. Z-1 SCHEDULE A



THIS MAP IS AN UNOFFICIAL EXTRACT FROM THE ZONING BY-LAW WITH ADDED NOTATIONS

FILE NO:

Z-9570

AR

MAP PREPARED:

2022/11/24

Jl

1:1,500

0 5 10 20 30 40 Meters

Appendix E – Shadow Study Images

