

May 22, 2019

Michael Tomazincic, Manager (Current Planning)
Development and Compliance Services
Development Services Division
City of London
300 Dufferin Avenue
London, ON N6A 4L9

Dear Mr. Tomazincic:

**RE: Supplemental Official Plan Amendment (OZ-9043)
3334 and 3354 Wonderland Road South, London
Gateway Casinos and Entertainment Ltd.
OUR FILE 1094'AZ'**

On behalf of Gateway Casinos and Entertainment Ltd. (Gateway), MHBC submitted a Combined Official Plan Amendment and Zoning By-law Amendment (OPA/ZBA) application on March 15, 2019 in support of a proposed regional-scale entertainment facility (casino) planned for the above-referenced property. This application was subsequently deemed complete by your office and is currently being processed as City of London File: OZ-9043.

DEVELOPMENT ARRANGEMENT

In conjunction with the OPA/ZBA application, MHBC prepared a Planning Justification Report (March 2019) and an Urban Design Brief (March 2019) evaluating the planning and design merits of the proposed 'Starlight Casino'. Both reports addressed the plan to position the casino building internal to the site, setback approximately 90 m from the Wonderland Road South corridor. As outlined in Section 3.3 of the Planning Justification Report:

The casino building is positioned internal to the Site to:

- *Optimize the functionality of casino operations and to facilitate its use as a regional-scale entertainment facility;*
- *Provide safe and efficient site accessibility, internal circulation, and loading/unloading (for private vehicles, buses, service vehicles);*
- *Promote prominent views and vistas of the casino building and the landscaping arrangement from Wonderland Road South;*
- *Provide convenient patron access from the entire parking area and the street corridor;*
- *Support an appropriate gradation in building scale in keeping with the location of existing large-format retail stores in the Wonderland Road Community Enterprise Corridor (WRCEC); and*
- *Facilitate the future (long-term) reformatting of the Site into a mixed-use form.*

In light of the proposed building position, the conceptual landscape design prepared for this development has been designed to enhance the Wonderland Road South streetscape and to help soften the appearance of surface parking areas. Key design objectives for the landscape plan are summarized in Section 3.2 of the Planning Justification Report:

The landscape plan is intended to achieve the following general objectives:

- *Contribute to the Wonderland Road South streetscape by providing a high level of landscaping along the street frontage, with clustering of landscaping enhancements at building entrances and along major pedestrian routes;*
- *Integrate a variety of landscaping elements (e.g., coordinated tree/shrub planting, outdoor plazas, street furniture) to activate the street frontage; provide comfortable public spaces; and to help define the street edge;*
- *Utilize plantings to screen parking areas from the Wonderland Road South corridor;*
- *Employ consistent, and complementary, landscape materials throughout the development;*
- *Incorporate a variety of design elements to break up the visual impact of the parking area, including landscaped islands, pedestrian corridors and crosswalk features; and*
- *Coordinate entryways, pedestrian corridors and site signage with landscape materials.*

SUPPLEMENTAL OFFICIAL PLAN AMENDMENT

During the course of the OPA/ZBA application process, the building position and the forecourt parking arrangement have been the subject of additional review in response to comments received through public consultation. In particular, the proposal to locate a parking area between the Wonderland Road South corridor and the casino building has been further evaluated in the context of Southwest Area Plan (SWAP) policies. In light of this review, and pursuant to the WRCEC policies of the SWAP, it is recognized that the proposed casino layout should have regard for the 'main street' format encouraged for this mixed-use corridor. In this respect, Section 20.5.3.9 iii) b) of this Secondary Plan prescribes several commercial design policies that are intended to promote a main street orientation. Notwithstanding that, in our opinion, a casino is an entertainment use rather than a commercial use in the context of the WRCEC, the policies of this Section were considered as part of project planning.

Based upon our assessment of Section 20.5.3.9 iii) b), it is our opinion that the proposal aligns with the associated policies excluding the fourth bulleted provision:

- *No parking, driveways, lanes or aisles shall be permitted between the buildings and public sidewalks;*

The purpose and intent of the aforementioned policy was reviewed in considerable detail during the preliminary design phase of this project. Additionally, conceptual design options with no forecourt parking were prepared and evaluated by the project team. Following a review of these concept plans, it was concluded that locating the building internal to the site was a preferable design approach given the planning rationale referenced from Section 3.3 of the Planning Justification Report. Further, the landscape plan submitted as part of the Site Plan Approval (SPA) application (City File: SPA19-027) incorporates street edge and forecourt treatments that are in keeping with the design objectives referenced from Section 3.2 of that Report. Refinements to the site layout are also being evaluated as part of the SPA review process to: reinforce the relationship between the street and the building; clearly differentiate the forecourt from a conventional parking area; and further reflect the design direction of Section 20.5.3.9 iii) b) of the SWAP.

In light of these considerations and the broader planning analysis detailed in our Planning Justification Report, to facilitate the proposed development we are requesting that application OZ-9043 be amended to exempt the casino development from the referenced policy of Section 20.5.3.9 iii) b) of the SWAP. The intent to this supplemental, site-specific OPA is to allow for parking, driveways, lanes and aisles between the casino building and the public sidewalk. It is our opinion that this proposed amendment is: consistent with the Provincial Policy Statement; in keeping with the goals, objectives and policy direction of the City's 1989 Official Plan, new Official Plan (The London Plan) and Southwest Area Plan; appropriate for the site; and compatible with the existing development context.

We look forward to working with your office on the review of this application. Should you have any questions pertaining to this proposed Official Plan Amendment, please do not hesitate to contact the undersigned.

Yours truly,

MHBC



Scott Allen, MA, RPP
Partner

cc. *Melissa Campbell, City of London*
Terry Black, Gateway Casinos & Entertainment Limited
Mark Wronski/Amanda Fics, Cumulus Architects Inc.
Michael Stewart, EllisDon