

PLANNING AND DESIGN REPORT

OFFICIAL PLAN AMENDMENT AND
ZONING BY-LAW APPLICATIONS

1105 Wellington Road
White Oaks Mall
City of London

Date:

March 2024

Prepared for:

Westdell Development Corp.

Prepared by:

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Table of Contents

1.0	Introduction	1
1.1	Overview	1
1.2	Report Framework	3
1.3	Planning Applications	3
2.0	Site Location & Surrounding Land Uses	5
2.1	Site Description	5
2.2	Surrounding Land Uses	5
2.3	Spatial Analyses	10
2.3.1	Regional Spatial Analysis	10
2.3.2	Local Analysis	12
3.0	Description of Proposal	14
3.1	Design Goals and Objectives	14
3.2	Concept Plan	14
3.3	Master Plan Concept	17
3.4	Design Considerations	20
4.0	Planning Analysis	23
4.1	Provincial Policy Statement	23
4.2	City of London Official Plan (The London Plan)	31
4.2.1	Status	31
4.2.2	Place Type (Map 1)	31
4.2.3	Policy Overview	31
4.2.4	Our Strategy	33
4.2.5	Our City	35
4.2.5.1	Overview	35
4.2.5.2	Built-Area Boundary/Primary Transit Area	36
4.2.5.3	Transit Village and Rapid Transit Corridors	38
4.2.6	City Design	39
4.2.7	Transit Village Place Type	44

4.2.8	Protected Major Transit Station Areas	46
4.2.9	Impact Mitigation	47
4.2.10	Our Tools.....	49
4.2.10.1	Guideline Documents	49
4.2.10.2	Evaluation Criteria.....	50
4.2.11	Specific Area Policies.....	51
4.2.12	Community Consultation Strategy.....	53
4.2.13	Summary.....	54
5.0	City of London Zoning By-law Z.-1.....	55
5.1	Existing Zoning.....	55
5.2	Proposed Zoning	55
6.0	Conclusions.....	59

List of Tables

Table 1.0:	Required Planning Applications	3
Table 2.0:	Surrounding Land Uses	7
Table 3.0:	Consistency with Provincial Policy Statement	14

List of Figures

- 1 Location Map
- 2 White Oaks Mall, Overhead from Wellington Road
- 3 White Oaks Mall, Overhead from Bradley Avenue
- 4 White Oaks Mall, Overhead from Jalna Boulevard
- 5 Conceptual Rendering of Rapid Transit Stop Adjacent to White Oaks Mall
- 6 Regional Spatial Analysis
- 7 Local Spatial Analysis
- 8 Conceptual Rendering from Bradley Avenue
- 9 Conceptual Rendering with Adjacent Residential
- 10 Conceptual Master Plan
- 11 Conceptual Rendering from White Oaks Mall
- 12 The London Plan – Place Types
- 13 Massing, Looking North
- 14 Podium from Bradley Avenue
- 15 Podium from Internal Mall Entrance
- 16 Conceptual Rendering from Bradley Avenue Showing Building Elements
- 17 Massing of Local Development Setting

- 18 Zoning By-law Z.-1, Schedule A
- 19 Proposed Zoning, Schedule A

List of Appendices

- Appendix A: Concept Plan; Conceptual Master Plan; Conceptual Landscape Plan
- Appendix B: Selected Floor Plans (Towers 1 and 2)
- Appendix C: Architectural Perspectives and Renderings
- Appendix D: Building Elevations/Section Drawings
- Appendix E: Shadow Study
- Appendix F: Zoning Data Sheet

1.0 Introduction

1.1 Overview

MHBC has been retained by Westdell Development Corp. to assist with an application to amend the City of London’s Official Plan (The London Plan) and Zoning By-law No. Z.-1 in support of a residential development proposal for lands addressed as 1105 Wellington Road (known locally as “White Oaks Mall”). The White Oaks Mall property measures approximately 18.7 ha in area and is located at the southwest corner of the Wellington Road / Bradley Avenue intersection. The subject property is situated within the City’s Primary Transit Area and forms part of the White Oaks planning district.

Westdell Development Corp. (Westdell) is submitting Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) applications to permit a high-rise tower development within a portion of the mall site measuring approximately 0.83 hectares in area and located immediately west of the White Oaks Mall entrance from Bradley Avenue (the “Site”). The Site is approximately has 82 metres of frontage on Bradley Avenue and a depth of 101 metres (all measurements herein are approximations). A two storey parking structure servicing the mall is currently located on these lands.

In support of this proposal, Zedd Architecture has prepared a conceptual design illustrating the intended site layout and high-rise building forms, as well as a conceptual master plan for the entirety of the mall property. The following represent core project objectives that helped to guide the proposed design:

- Integrate high density residential units into an existing shopping centre to (1) function cohesively within mall operations and (2) support the intensification and overall vitality of the Wellington Road / Bradley Avenue development node (herein referred to as the ‘Wellington/Bradley’ node);
- Design high-rise forms that will create a prominent visual presence and will be compatible with the surrounding development context;
- Align the design layout with the applicable planning policy framework and related planning initiatives; and,
- Promote a compact, efficient development to help broaden housing choice and housing supply within the White Oaks community.

In summary, Westdell is proposing to intensify the existing commercial development on the Site with the introduction of 30 and 32 storey high-rise towers connected by way of a mid-rise podium feature. The proposed towers would accommodate approximately 568 dwelling units contained within a range of apartment configurations

to respond to market demand. One level of underground parking is provided for the patrons of White Oaks Mall, with Levels 1 to 6 of the podium consisting of residential parking with active uses provided along Bradley Avenue. Pedestrian entrances are provided from the adjacent public sidewalk system and connect the Site to the surrounding mall property. Amenity space is provided within the ground (main) floor, Level 7 of the podium and the tower penthouses.

The planning merits of this proposal are evaluated in detail within this Report and are summarized below:

- The subject lands are located within the Primary Transit Area of the City of London, form part of the City's White Oaks planning district, and are designated for a mix of urban lands uses including intensive residential uses. The property is also located within a Transit Village Protected Major Transit Station Area pursuant to The London Plan;
- The Site is well suited for the proposed high-rise forms, given its physical characteristics, its location within a prominent development node, and its proximity to the arterial road network, public transit, active transportation routes, offices, schools, parks and residential neighbourhoods. Further, introducing high-rise apartment buildings within the White Oaks Mall Site would support both the intensification and overall vitality of the Wellington Road / Bradley Avenue development node;
- The massing, orientation, and articulation of the proposed high-rise towers are designed: to be compatible with surrounding land uses; to complement the local development context; and to promote compact, efficient development. Additionally, the contemporary, high-rise tower design is intended to limit shadow impacts and to minimize obstruction of views proximate to the Site;
- The contemporary architectural design of the proposed high-rise towers would contribute positively to the local streetscape and the City's skyline. Additionally, the podium elements of the building have been designed to help enhance the pedestrian environment along the Bradley Avenue corridor;
- The addition of 568 apartment-style units broadens housing choice and housing supply within the White Oaks community;
- Technical assessments carried out for the project generally conclude that the City's servicing infrastructure and road network can accommodate the proposed development (with consideration for study recommendations); and,
- In our opinion, this intensification proposal: is consistent with the Provincial Policy Statement; has regard for the principles and policy objectives of The London Plan; and aligns with the design direction of the City's Placemaking Guidelines.

1.2 Report Framework

This Planning and Design Report has been prepared for submission to the City of London in support of the aforementioned OPA and ZBA applications and includes the following primary components:

- An introduction and general description of the subject lands, surrounding uses and existing conditions, to provide an understanding of the locational context;
- A summary of the preliminary concept plan prepared for the Site, including an overview of the core design components of the high-rise tower project;
- A review of the planning permissions applicable to the property; and
- An assessment of the proposal relative to: (1) the policy framework of the Provincial Policy Statement and The London Plan, and (2) the development regulations of the City's Zoning By-law.

The following documents were primary references reviewed in the preparation of this Report:

- Provincial Policy Statement;
- City of London Official Plan (The London Plan);
- City of London Zoning By-law No. Z.-1; and,
- City of London Placemaking Guidelines.

1.3 Planning Applications

Our analysis has confirmed that the following applications are required to permit the proposed development:

Table 1.0 – Required Planning Applications

Planning Application	Approval Authority
Official Plan Amendment (The London Plan) to permit high-rise towers having a maximum height of 32 storeys in the context of the Transit Village place type.	City of London
Zoning By-law Amendment to permit a compounded Regional Shopping Area/Residential R10 Special Provision (RSA4/R10-5()*H115*D750) Zone on the	City of London

Planning Application	Approval Authority
Site, with special permissions for a maximum height of 115 metres, a maximum residential density of 750 units/ha, a minimum front yard and interior yard setback of 1.5 metres, a minimum rear yard setback of 7.5 metres, and a maximum lot coverage of 80% within the zone boundary.	
Site Plan Approval (future application)	City of London

A Pre-Application Consultation meeting was held with City of London staff on August 31, 2023 to review the submission requirements for the development concept. As set out in the associated Record of Pre-Application Consultation issued by the City for this proposal, the following reports have been prepared in support of the project and are enclosed with the planning applications:

- Planning and Design Report;
- Stage 1 Archaeological Assessment;
- Traffic Impact Study;
- Master Servicing Report; and,
- Tree Preservation Report.

2.0 Site Location & Surrounding Land Uses

2.1 Site Description

White Oaks Mall is located in south-central London, approximately 1.3 kilometres north of the Provincial Highway 401 / Wellington Road interchange. In its entirety, the mall lands measure 18.7 ha in area and have 380 metres of frontage on Wellington Road, 270 metres of frontage on Bradley Avenue, and 350 metres of frontage on Jalna Boulevard.

The Site, which comprises the area proposed to be developed via the proposed OPA and ZBA applications, measures approximately 0.83 hectares in area and is located immediately west of the White Oaks Mall entrance from Bradley Avenue. The proposed development area has 82 m of frontage on Bradley Avenue and a depth of 101 m, and a two storey parking structure servicing the mall is currently located on these lands. **Figure 1** of this Report illustrates the general location of the Site.

The White Oaks Mall property contains a regional-scale shopping mall, two surface parking structures, and surface parking lots. The mall is entirely enclosed and accommodates 65,555 m² of gross leasable floor area. Vehicular access to the mall site is provided from Wellington Road, Bradley Avenue, and Jalna Boulevard, with signalization provided at the Bradley Avenue access and the southern Wellington Road access. Commercial units located immediately south of the southern Wellington Road access (i.e., Canadian Tire, Mark's Work Warehouse) are not part of the mall property.

2.2 Surrounding Land Uses

The subject lands are located entirely within the City of London's Urban Growth Boundary and form part of the White Oaks planning district. Moreover, the Site is located within an established commercial node containing a mix of large format and/or smaller retail plazas situated along the Wellington Road corridor. The surrounding commercial/retail uses are primarily auto-oriented uses with large surface parking areas. Generally, surrounding these commercial lands is a mix of low, medium and high density residential neighbourhoods and open spaces areas, including a 15 storey high-rise tower situated on the west side of Jalna Boulevard and Century Centre, an approved 27-storey development in the northwest corner of the Wellington/Bradley node.

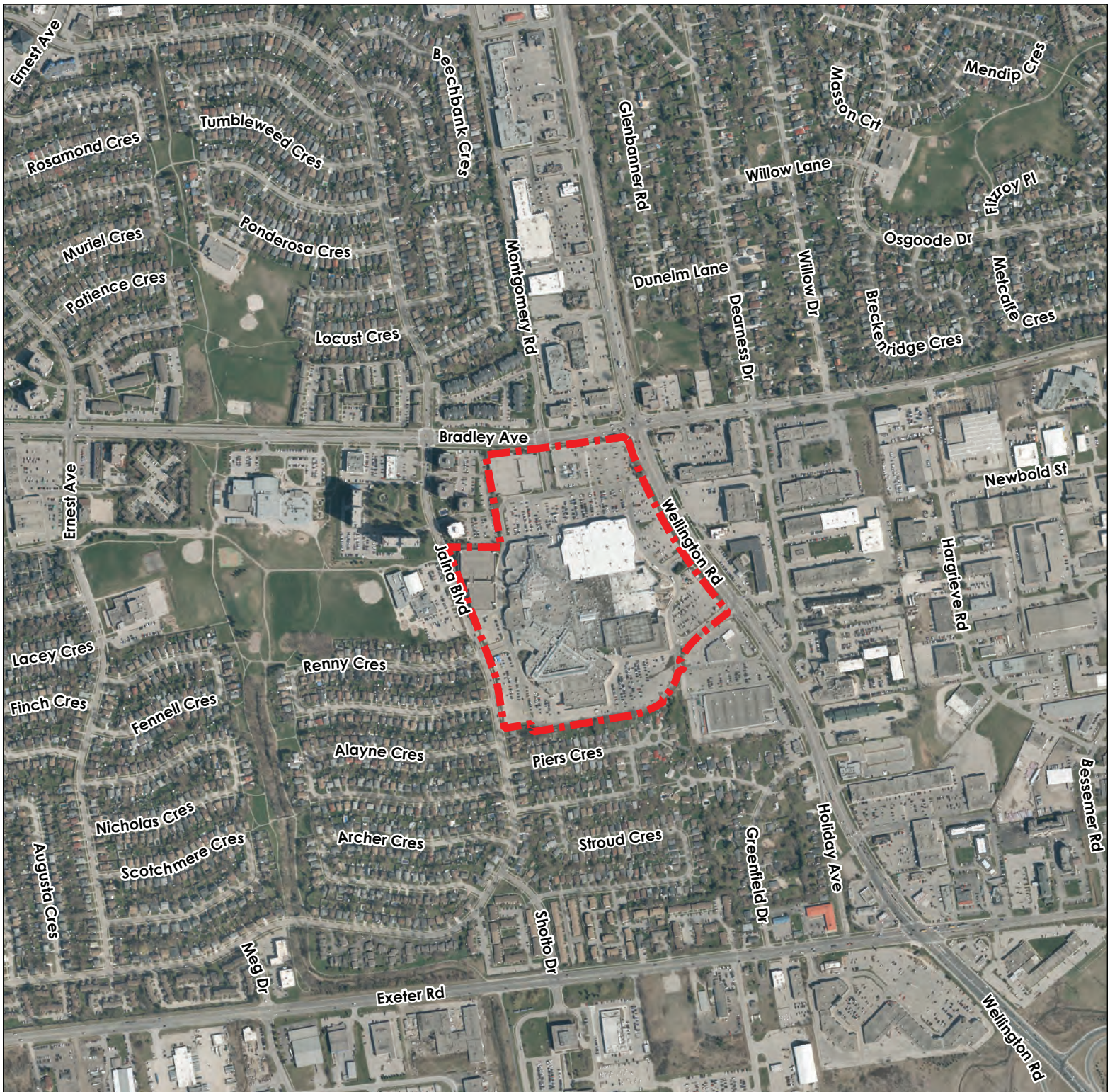



Figure 1
General Location Plan

Legend

 Subject Lands

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The following images illustrate several White Oaks Mall features from the adjacent street frontages, viewed from an overhead perspective for scale.

Figure 2: White Oaks Mall, Overhead (West) Perspective from Wellington Road

Source: Westdell



Figure 3: White Oaks Mall, Overhead (South) Perspective from Bradley Avenue

Source: Westdell



Figure 4: White Oaks Mall, Overhead (Southeast) Perspective from Jalna Boulevard

Source: Westdell



Adjacent to the Site, both Wellington Road and Bradley Avenue incorporate four through traffic lanes, turning lanes, and sidewalks. Jalna Boulevard provides two traffic lanes. Bike lanes are also provided on Bradley Avenue adjacent to the Site.

With respect to street classification, Map 3 (Street Classifications) of The London Plan classifies the adjacent section of Wellington Road as a Rapid Transit Boulevard, while the adjacent section of Bradley Avenue is classified as a Main Street / Civic Boulevard and Jalna Boulevard is classified as a Neighbourhood Connector. Policy 371 of this Official Plan identifies that Rapid Transit Boulevards are planned to prioritize through movement and connections with transit vehicles. These street types are also intended to support the movement of high volumes of traffic (pedestrian, cycle and vehicular), and are to integrate a high standard of urban design. This Policy also states that Main Streets and Neighbourhood Connector are to prioritize pedestrians, with Main Streets intended to move medium to high volumes of traffic and Neighbourhood Connectors intended to move lot to medium traffic volumes. Further, Policy 371 prescribes that both Main Streets and Neighbourhood Connector are to integrate a high standard of urban design.

Additionally, Map 3 identifies that a Rapid Transit Station is to be located along the adjacent frontage of Wellington Road (refer to **Figure 5**). Pursuant to the City's corporate website, we understand this station would form part of the Wellington Gateway (Phase 4) component of the City's Bus Rapid Transit (BRT) system, with construction of this Phase anticipated to occur in 2024/2025. As part of this project, Wellington Road is to be widened to include two bus only lanes and a station at the intersection of Wellington Road and the southern entrance to White Oaks Mall.

Sidewalks will continue to be provided along the western side of Wellington Road, while a new multi-purpose trail is proposed along the eastern side of Wellington Road.

Figure 5: Conceptual Rendering of Rapid Transit Stop Adjacent to White Oaks Mall

Source: City of London



Table 2.0 summarizes the diverse mix of uses in the immediate vicinity of the White Oaks Mall.

Table 2.0 – Surrounding Land Uses

Relative Location	Existing Land Uses
TO THE NORTH:	Auto-oriented service / retail uses along the Wellington Road corridor; future high-rise development at the northwest intersection of Bradley Avenue and Wellington Road; low-rise residential neighbourhood; Rich Hansen Public School; White Oaks soccer field and skatepark.

Relative Location	Existing Land Uses
TO THE EAST:	Service/retail commercial uses; light industrial; future Rapid Transit Station.
TO THE SOUTH:	Service/retail commercial uses along the Wellington Road corridor; low-rise residential neighbourhood, Highway 401.
TO THE WEST:	Medium- and high-rise residential uses; London Public Library; South London Community Centre; White Oaks Public School; South London Community Pool; St. Anthony French Immersion Catholic Elementary School; White Oaks Park; low-rise residential.

2.3 Spatial Analyses

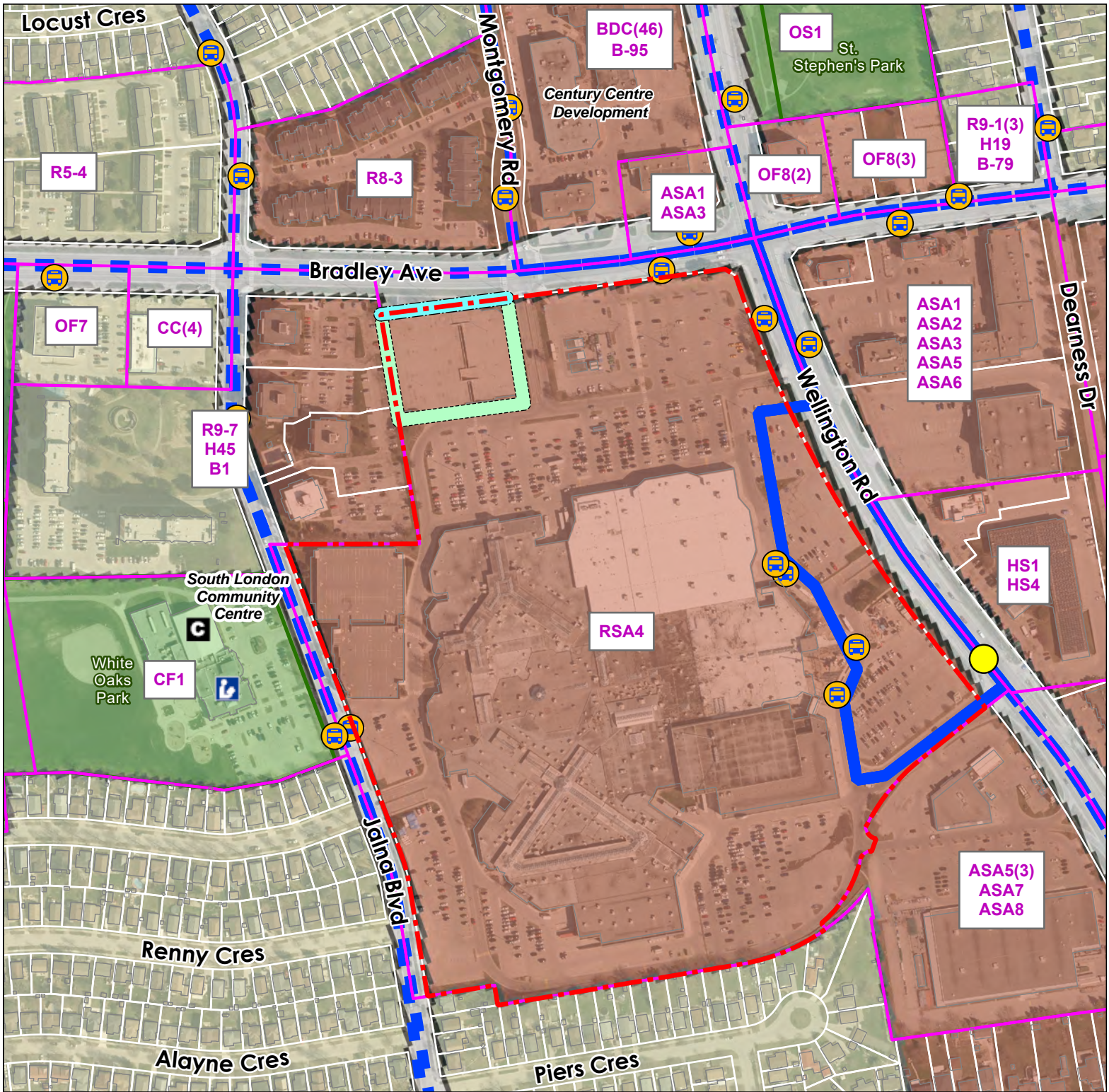
2.3.1 Regional Spatial Analysis

A Regional Spatial Analysis was conducted for White Oaks Mall at a 400 metre radius and for the Site at an 800 metre radius (refer to **Figure 6** of this Report).

The 400 metre radius (5 minute walk) identifies a number of land uses in the vicinity of the mall. Referencing Map 1 (Place Types) of The London Plan, to the immediate north, south, and west are commercial activities associated with the Transit Village place type. These areas are developed for a variety of service/retail commercial uses. Uses to the southwest and beyond the Transit Village place type to the north are lands in the Neighbourhoods place type containing established low density residential subdivisions. A public library, community centre, school, and greenspace are also located to the west across Jalna Boulevard.

London Transit bus service is widely available within 400 metres of the Site, including stops within the mall parking lot. A future Rapid Transit Station is planned along the Wellington Road frontage near the southern entrance to the mall.

Within the 800 metre radius, the land uses identified above are generally surrounded by lands containing low density residential development to the south, north, and west interspersed with community uses including schools and parks. Light industrial uses are located east of the mall beyond the Transit Village along Hargrieve Road. A Shopping Area place type comprised of established service/retail commercial uses is also located at the Wellington Road / Exeter Road intersection. Additional London Transit bus service is also available within this radius.



**Figure 6
Location Spatial
Analysis**

Legend

- Subject Lands
- Transit Village
- Green Space
- Neighbourhoods
- Rapid Transit Corridors
- Active Frontage Zone
- Zone of Sensitivity
- Transit Route
- Transit Stop
- Proposed BRT Station
- C Community Centres
- L Public Libraries
- Zone Limit

- | | |
|---------------------------------------|--|
| R1 Residential R1 Zone | ASA Associated Shopping Area Commercial Zone |
| R5 Residential R5 Zone | OC Office Conversion Zone |
| R8 Residential R8 Zone | OF Office Zone |
| R9 Residential R9 Zone | OS Open Space |
| BDC Business District Commercial Zone | RSA Regional Shopping Area Zone |
| CC Convenience Commercial Zone | |
| CF Community Facility Zone | B Bonusing |
| HS Highway Service Commercial Zone | H Height Maximum |

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2.3.2 Local Analysis

A Local Analysis referencing Schedule "A" of the City's Zoning By-law was conducted to understand the Site's relationship with the surrounding uses in the immediate area (refer to **Figure 7** of this Report). The key findings of the analysis are summarized below:

- An active frontage zone has been identified along the Bradley Avenue frontage. Appropriate pedestrian connections, extensive glazing, and an enhanced podium façade would be provided along these frontages to help activate these streetscapes;
- Zones of sensitivity has been identified where the subject lands interface with the Bradley Avenue mall entrance to the east, the interior driveway and the cluster apartment development to the west (1100 to 1106 Jalna Boulevard). Section 3.3 of this Report and the associated graphics illustrate the design response to these interfaces;
- The Site is serviced by transit and is within convenient walking distance of London Transit bus stops, including a future Rapid Transit Station; and,
- The Site is well served by local amenities, including a library, community centre, and public parkland.

A planned mixed-use, high-rise development, herein referred to as 'Century Centre', received OPA and ZBA approvals in 2022 for lands in the northwest corner of the intersection of Wellington Road and Bradley Avenue (1067, 1069, and 1071 Wellington Road). The Bonus Zone (B95) approved in conjunction with these applications permits five high-rise apartment towers ranging from 10 to 27 storeys in height with a total development yield of 1,272 residential units, 1,800 square metres of office gross floor area, and 810 square metres of retail gross floor area. Bonus Zone B95 also includes include site-specific permissions for building height (96 m) and residential density (566 units), as well as special provisions for residential, commercial, and retail parking rates.

Century Centre conceptual renderings included in this Report are predicated on material incorporated into the Planning Staff report submitted to the Planning and Environment Committee in conjunction with the July 25, 2022 public participation meeting (City of London File Nos.: O-9263/Z-9264).

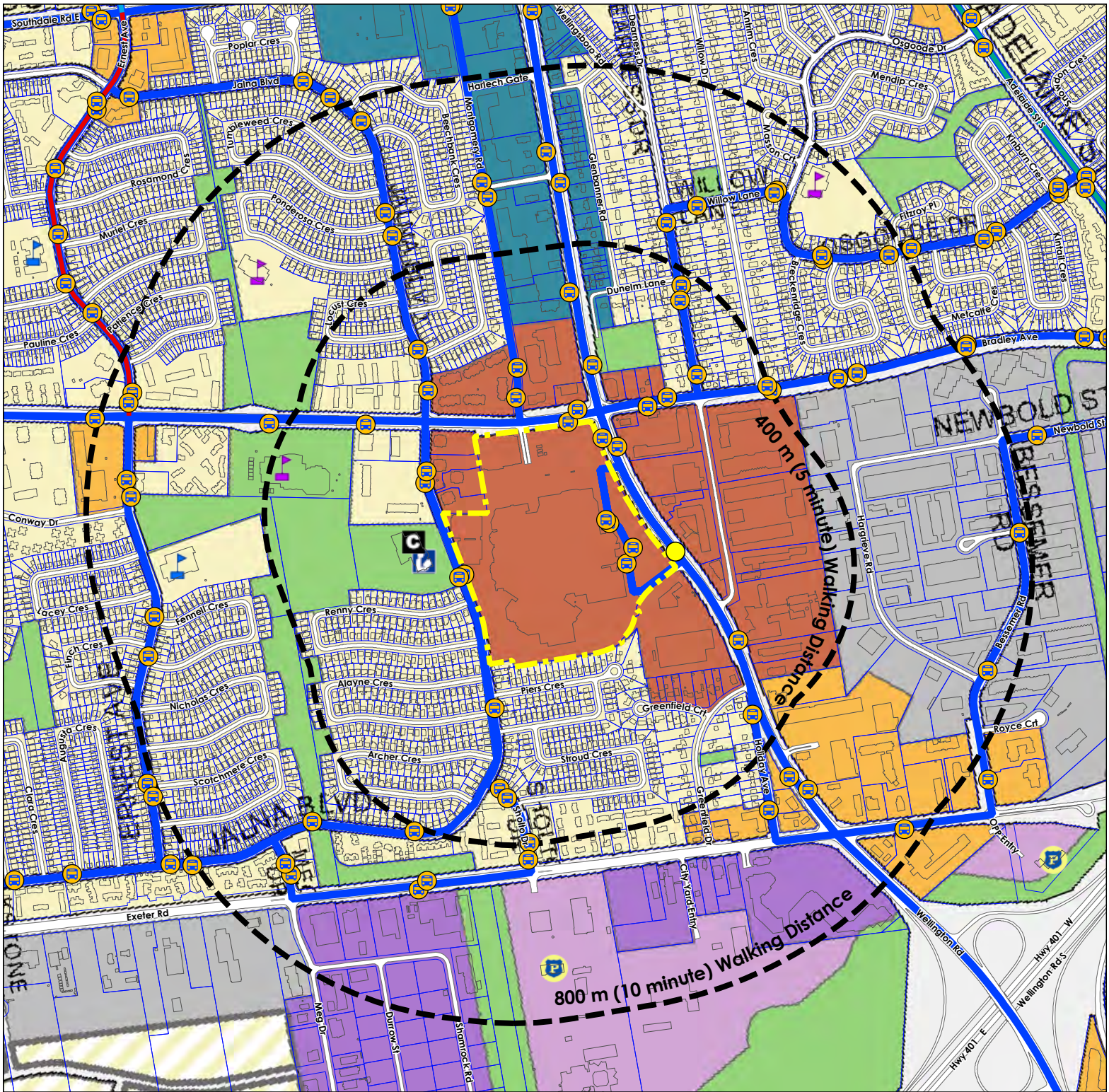


Figure 7
Regional Spatial
Analysis

Legend

- Subject Lands
- Transit Village
- Green Space
- Neighbourhoods
- Rapid Transit Corridors
- Light Industrial
- Commercial Industrial
- Institutional
- Shopping Area
- Future Community Growth
- Public Libraries
- Catholic Elementary
- Public Elementary
- Bike Road Route - Signed
- Bike Lane
- Buffered Bike Lane
- Transit Route
- Proposed BRT Station
- Transit Stop
- Community Centres
- Police Services

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3.0 Description of Proposal

3.1 Design Goals and Objectives

White Oaks Mall is proposing to amend the planning permissions applying to the Site to allow for development of two high-rise forms on these lands. This intensification project is intended to be compatible with the local development context and complementary to the mix of uses within the Wellington/Bradley node.

The following design objectives were identified to help achieve this project goal:

1. Introduce intensive residential buildings within the White Oaks Mall lands: (1) to function cohesively with the existing mall arrangement; (2) to support the diversification and long-term vitality of the Wellington/Bradley node; (3) to support investment in transit services, including the BRT system; and (4) to provide a design response that is compatible with the local development context;
2. Design high-rise forms that will create a prominent visual presence to further define the development node and to help frame, and reinforce, the street wall along Bradley Avenue;
3. Create a positive addition to the Wellington/Bradley node by enhancing the visual qualities of the streetscape and by providing an engaging pedestrian environment;
4. Intensify the Site in a manner that will be supportive of transit and alternative transportation modes, and will allow residents to walk to nearby shopping centres, community uses; offices, residential neighbourhoods, parkland, and open space;
5. Incorporate amenity areas into the building design and integrate multiple pedestrian connections to provide accessibility to the Bradley Avenue sidewalk and the adjacent mall walkways;
6. Develop a vehicular ingress/egress arrangement that minimizes local traffic disruptions; and,
7. Align the project with the design direction set out in the City's Official Plan and applicable guideline documents, where practical and appropriate.

3.2 Concept Plan

Zedd Architecture has prepared a conceptual Site plan (concept plan) in support of the aforementioned design goals and objectives, and with consideration for the conceptual landscape plan designed by Ron Koudys Landscape Architects (RKLA). **Appendix A** of this Report illustrates the concept plan, master plan/connectivity plan and

conceptual landscape plan. **Appendix B** includes selected floor plans for the proposed towers, **Appendix C** provides several architectural perspective drawings of the tower arrangement and conceptual tower elevations/cross-sections are provided in **Appendix D**. Additionally, **Appendix E** provides a shadow assessment of the development plan prepared by Zedd Architecture.

Collectively, the plans and conceptual graphics included in this Report illustrate the layout, scale and character, and connectivity of the proposed development. The core elements of the proposed development are as follows:

Core Elements of Development Proposal:

- Two residential towers containing 568 units and providing several apartment configurations to promote housing choice and respond to local market demand. Tower 1 (32 storeys) would be positioned adjacent to Bradley Avenue and Tower 2 (30 storeys) would be positioned to the southwest, with both buildings located on top of a common podium (refer to **Figure 8**). This tower layout would yield a residential density of 685 units/ha, calculated only for the development area (i.e., not the entirety of the White Oaks Mall site).
- High-rise tower designs that position and orient building mass to the Bradley Avenue frontage. The towers utilize a podium at the base of each building with the core tower component containing residential units positioned above the podium components. The podium is primarily utilized for residential parking for Levels 1 through 6, with residential units positioned at the Bradley Avenue interface within these Levels. Levels 7 and 8 of the podium are predominately used for apartment units (refer to **Figure 9**).
- One level of underground parking (Level P1) for commercial uses associated with the mall and six levels of residential parking for the apartment development. A total of 141 commercial parking spaces are provided in Level P1, with 734 residential parking spaces integrated into Levels 1 to 6 of the podium. Access to the structured parking levels would be provided from the internal (south) driveway, with clear labels differentiating between the two parking types. One bicycle parking space would be provided per residential unit in Level P1 (568 stalls), and storage lockers for residents would also be provided within the underground parking arrangement.
- Common amenity space is planned within the ground floor of the podium, Level 7 of the podium and rooftop terraces.
- An internal access arrangement integrating pedestrian and vehicular entrances/exits from the existing mall parking field, as well as street level pedestrian entrances from Bradley Avenue.

- Landscaping elements, including tree planting, provided at key locations to help enhance the pedestrian environment from both the mall level and street level.

Figure 8: Conceptual Rendering from Bradley Avenue, Including Century Centre Concept to the North (Left)

Source: Zedd Architecture



Figure 9: Conceptual Rendering and Adjacent Residential Development (1104 Jalna Boulevard) to the West (Left)

Source: Zedd Architecture

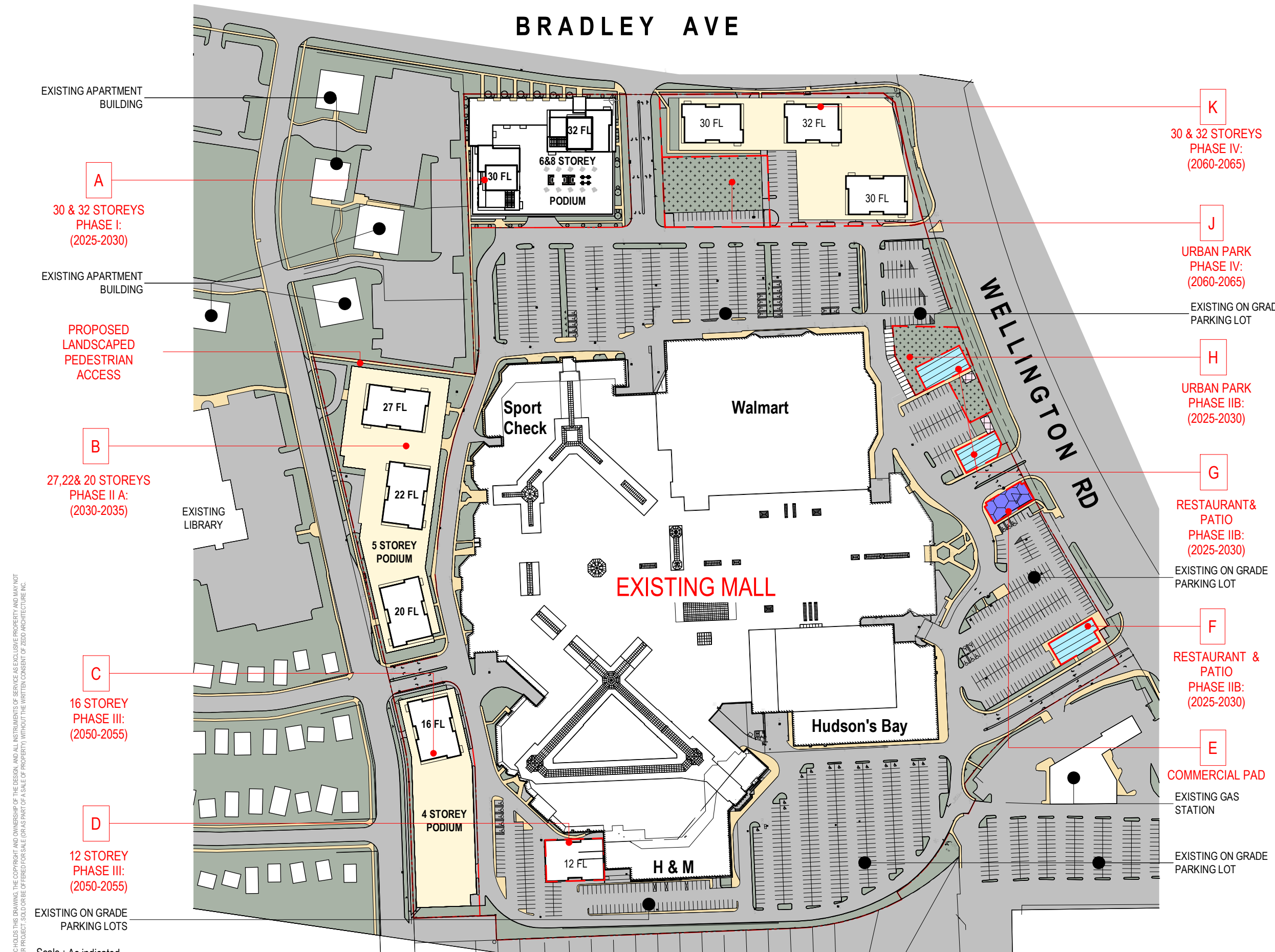


3.3 Master Plan Concept

This development proposal pertains to a portion of the subject property generally located adjacent to the mall entrance from Bradley Avenue, on lands currently occupied by a parking structure.

The OPA and ZBA applications are intended to facilitate the further intensification of the Site. In conjunction with project planning, Zedd Architecture has developed a design concept envisioning how future project phases and the existing mall would ultimately be integrate into a cohesive development (refer to **Figure 10**).

BRADLEY AVE



Master Plan Legend				
Colour	Name	Phase	No.Of Units	Description
[Yellow]				Existing & Proposed Sidewalk
[Green]				Existing Grass
[Grey]				Asphalt
[Red outline]	A	PHASE I (2025-2030)	559	Residential Property=7,100sm 6 & 8 Storeys Podium 2 Towers: 30&32 Storeys
[Red outline]	B	PHASE II A (2030-2035)	613	Residential Property=10,320sm 5 Storeys Podium 3 Towers:27,22&20 Storeys
[Red outline]	C	PHASE III: (2050-2055)	183	Residential Property=5,610sm 5 Storeys Podium 1 Towers:16 Storeys
[Red outline]	D	PHASE III: (2050-2055)	100	Residential Property=920sm 1 Tower:12 Storeys
[Blue hexagon]	E	PHASE II B: (2025-2030)		CRU Pad = 390sm
[Red grid]	F	PHASE II B: (2025-2030)		CRU Pad = 465sm
[Red grid]	G	PHASE II B: (2025-2030)		Restaurant Pad = 865sm (465+400sm) Patio = 95sm
[Green dots]	H	PHASE II B: (2025-2030)		Urban Park = 1,475sm
[Green dots]	J	PHASE IV: (2060-2065)		Urban Park = 2,200sm
[Red outline]	K	PHASE IV: (2060-2065)	680	Residential Property=9,120sm 6 Storeys Podium 3 Towers: 30, 30&32 Storeys

Figure 10
Conceptual Master Plan

EXISTING APARTMENT BUILDING

A
30 & 32 STOREYS
PHASE I:
(2025-2030)

EXISTING APARTMENT BUILDING

B
27,22& 20 STOREYS
PHASE II A:
(2030-2035)

EXISTING LIBRARY

C
16 STOREY
PHASE III:
(2050-2055)

D
12 STOREY
PHASE III:
(2050-2055)

EXISTING ON GRADE PARKING LOTS

K
30 & 32 STOREYS
PHASE IV:
(2060-2065)

J
URBAN PARK
PHASE IV:
(2060-2065)

EXISTING ON GRADE PARKING LOT

H
URBAN PARK
PHASE IIB:
(2025-2030)

G
RESTAURANT & PATIO
PHASE IIB:
(2025-2030)

EXISTING ON GRADE PARKING LOT

F
RESTAURANT & PATIO
PHASE IIB:
(2025-2030)

E
COMMERCIAL PAD

EXISTING GAS STATION

EXISTING ON GRADE PARKING LOT

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Scale : As indicated

This conceptual master plan provides a plan for additional residential and commercial development from 2025 to 2065, with residential development generally proceeding counter-clockwise from the Site (i.e., development along Jalna Boulevard precedes development along Wellington Road). Notwithstanding that the master plan is highly conceptual and long-term in scope, it is important to note that the final project phase (Phase 4) at Wellington Road and Bradley Avenue, planned for 2060 to 2065, respects provisions in long-term leases with existing commercial tenants requiring visibility from Wellington Road.

The proposed development is Phase 1A, with subsequent residential phases conceptually planned to include:

- Phase 2A (2030 – 2035):
 - Building B, three buildings ranging from 20 to 27 storeys with a five storey podium, providing 613 units;
 - Phase 2B, with the same construction timeline as Phase 2A, includes the development of an urban park fronting on Wellington Road with an area of approximately 0.2 hectares;
- Phase 3 (2050-2055):
 - Building C, a 16 storey building with a 4 storey podium, providing 183 units;
 - Building D, a 12 storey tower with 100 units;
- Phase 4 (2060 – 2065):
 - Building K, three buildings ranging from 30 to 32 storeys with a six storey podium, providing 680 units; and,
 - An additional urban park with an area of approximately 0.2 hectares

Including the proposed development, the master plan strategy integrates a total of 2,144 residential units within the White Oaks Mall property.

The overall vision for the master plan transitions height from Wellington Road westward toward White Oaks Park, providing appropriate height and density within a Transit Village. Connections to the Major Transit Station on Wellington Street are prioritized, with the master plan providing a new park along the Wellington frontage. Further, the master plan contemplates future commercial development fronting Wellington Road between 2025 and 2030; comprised of an additional commercial pad and two restaurant pads.

3.4 Design Considerations

Design considerations are reflected in the concept plan, conceptual renderings, and preliminary building elevations included with this Report. These elements are generally outlined below with input from Zedd Architecture, and further addressed in this Report. In our opinion, these design considerations and the associated conceptual plans demonstrate that this proposal would function effectively within the existing shopping centre arrangement and would integrate with the larger development context.

- **Building Form and Orientation.** The proposed high-rise towers would be positioned adjacent to Bradley Avenue with building mass stepped back from podium elements: to help reinforce the urban building line and pedestrian realm along the street corridor; to accentuate the streetscape; and to transition building height from the street. The towers share a 6 to 8 storey podium, with the 8 storey element oriented toward Bradley Avenue.
- **Building Massing.** The massing of the towers and integrated podium are designed to create a building form that has consideration for the local development context, including Century Centre, maintains a pedestrian scale and orientation along the street, and employs a contemporary design (refer to **Figure 11**). Furthermore, the proposed design has consideration for the potential impact of this development on the existing residential buildings to the west. In this regard, the towers are designed with efficient floor plates (961 m²) and are offset on the podium; reducing the visual impact of the massing and shadow impacts. The portion of the podium facing the residential buildings does not include active uses, reducing privacy concerns by minimizing direct overlook.

Figure 11: Conceptual Rendering from White Oaks Mall, Including Century Centre Concept to the Northeast (Right)

Source: Zedd Architecture



The proposed buildings integrate three principal elements above-grade:

- **Podium Element:** The six to eight storey podium component is intended to create a pedestrian-oriented frontage along the adjacent streetscape, and establish a positive relationship with the pedestrian realm and the existing and planned built form. Podium elements would contain amenity space, lobby space, vehicular parking, and accesses from Bradley Avenue and the mall parking field. Further, the podium design would integrate features to screen structured parking, while animating the street interface along Bradley Avenue with residential units.
- **Middle Element:** Residential units are largely contained in a defined middle feature of each tower, extending from Levels 7 to 32 (collectively). This building element includes the core apartment components above the podium base, with units containing individual balconies. Balconies vary in form and recess or protrude to create variation and interest. Distinctive vertical, horizontal, and centralized material patterns provide further articulation to the middle elements. In effect, the components of the middle feature are intended to soften the massing of the building, help frame and enhance the adjacent streetscapes, and contribute positively to the City's skyline.

- **Top Element:** The top of these buildings have been designed with distinctive architectural features that serve to support a cohesive design theme for the high-rises. The rooftop elements would be setback from the core tower features and would contain common rooftop terraces and mechanical equipment.

The architectural renderings and building elevations provided in Appendices C and D, respectively, further illustrate that the proposed massing has been broken up by projections, recessions and horizontal/vertical components. Additionally, visual articulation is achieved by varying building materials and heights, by providing wall and roofline elements, and by employing extensive glazing. Collectively, the components described above contribute to a modern, attractive design that would help to enhance and diversify the built form proximate to the Wellington/Bradley node.

- **Architectural Treatment.** The tower designs incorporate a cohesive, contemporary façade style integrating extensive glazing and rhythmic balconies and windows to help break up the continuous mass of the structure. Each tower is relatively distinct, while also contributing to a unified building design. Additionally, as discussed, the common podium integrates residential units positioned along the Bradley Avenue frontage to create a more distinctive and attractive design from the street interface.
- **Pedestrian Environment.** The residential elements of the proposed towers are to be accessed by common (main) pedestrian entrances from street level. Ground floor units facing Bradley Avenue are small-scale and have separate entrances that connect to the sidewalk. Several architectural features and landscape elements are planned to help activate the streetscape and the mall level, including large windows within the towers, entrance canopies, and enhanced hardscaping.

4.0 Planning Analysis

The proposed Official Plan and Zoning By-law Amendments must be assessed in terms of applicable policies prescribed by the Province of Ontario and the City of London. The following discussion outlines how the proposal addresses relevant policies of the Provincial Policy Statement and the City of London Official Plan (The London Plan).

4.1 Provincial Policy Statement

The current Provincial Policy Statement (PPS) was issued under Section 3 of the Planning Act and came into effect on May 1, 2020. The PPS provides overall policy direction on matters of provincial interest related to land use planning and development and sets the policy foundation for regulating the development and use of land. Part IV of the PPS sets out that this policy instrument provides a vision for land use planning in Ontario that focuses growth within settlement areas, and encourages efficient development patterns to optimize the use of land, resources, and public investment in infrastructure and public service facilities.

The proposed development plan has been evaluated with regard to the policy direction and provisions of the PPS. Based on this analysis, it is our opinion that specific policies in Section 1.0 (Building Strong Healthy Communities) are particularly relevant to this proposal. Table 3.0 demonstrates how the proposed development is consistent with the identified policies.

Table 3.0 – Consistency with Provincial Policy Statement

PPS Policy	Response
<p>1.1.1 Healthy, livable and safe communities are sustained by:</p> <ul style="list-style-type: none"> a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term; b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and 	<p>The proposed towers would accommodate approximately 568 market-based residential units and complementary commercial space on an 18.7 ha parcel that currently contains an existing shopping mall and associated parking. The intensive, residential character of this proposal supports compact urban form that would contribute to the long-term financial well-being of the Province of Ontario and the City of London (in the form of increased property tax assessment and the optimization of existing and planned</p>

PPS Policy	Response
<p>commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;</p> <p>c) avoiding development and land use patterns which may cause environmental or public health and safety concerns;</p> <p>e) promoting 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;</p> <p>g) ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;</p>	<p>infrastructure). The residential population and employees of this development would also contribute to the overall viability of the Wellington/Bradley node and the White Oaks planning district. Moreover, economic benefits would be derived from construction of the high-rise towers.</p> <p>The subject lands are located within a local development area containing a wide variety of service/retail commercial activities and residential forms. Implementation of this proposal would be compatible with this development context and would help further diversify the range and mix of multiple-unit housing available in the White Oaks community. Additionally, to service the needs of future residents and employees, the Site is proximate to commercial businesses, offices, institutional uses, community services, public transit, and the City's arterial road system and active mobility network.</p> <p>The proposed development should not result in environmental or public health and safety concerns.</p> <p>Preliminary water supply, sanitary sewage and stormwater management servicing reviews have been completed by MTE Consultants (MTE) to confirm that (1) the development can proceed in a cost-effective manner and (2) the necessary servicing infrastructure</p>

PPS Policy	Response
	<p>would be available to meet projected needs.</p> <p>It is anticipated that public service facilities available in the vicinity of the Site would accommodate demand generated from this development.</p>
<p>1.1.2 Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of up to 25 years, informed by provincial guidelines. However, where an alternate time period has been established for specific areas of the Province as a result of a provincial planning exercise or a provincial plan, that time frame may be used for municipalities within the area.</p> <p>Within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas.</p>	<p>This proposal would develop lands located within the City's Urban Growth Boundary (UGB) designated for residential purposes and high-rise forms pursuant to The London Plan. As discussed in Section 4.2 of this Report, this proposal conforms to the use permissions of the Official Plan. This development would also help the City accommodate its forecasted population growth and achieve its projected housing requirements, as set out in The London Plan and related policy documents.</p> <p>As discussed, this proposal would introduce intensive development on the Site to support the overall vitality of the Wellington/Bradley node. Implementation of this proposal would also broaden the range and mix of housing available in the White Oaks community to help respond to market demand.</p>
<p>1.1.3.1 Settlement areas shall be the focus of growth and development.</p>	<p>The Site is located within the City's UGB and is therefore considered part of a settlement area, as defined by the PPS.</p>
<p>1.1.3.2 Land use patterns within settlement areas shall be based on densities and a mix of land uses which:</p> <p>a) efficiently use land and resources;</p>	<p>The proposed tower configuration represents a compact land use pattern that supports the efficient use of land and services. As outlined</p>

PPS Policy	Response
<p>b) 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;</p> <p>c) minimize negative impacts to air quality and climate change, and promote energy efficiency;</p> <p>d) prepare for the impacts of a changing climate;</p> <p>e) support active transportation;</p> <p>f) are transit-supportive, where transit is planned, exists, or may be developed;</p>	<p>in this Report, preliminary servicing reviews have been carried to confirm that adequate servicing capacity is available to accommodate the intended development.</p> <p>It is anticipated that future residents of this development would support existing public service programs and facilities available proximate to the Site.</p> <p>Where practical and appropriate, the project would incorporate sustainable development principles to help minimize environmental impacts.</p> <p>The site layout promotes active transportation through the provision of multiple pedestrian connections to the Bradley Avenue corridor and the mall lands. Bicycle storage space is also planned for the underground parking structure.</p> <p>The subject lands are located within convenient walking distance of existing London Transit bus stops and a future Rapid Transit Station. Transit connectivity is available to employment areas, major public and cultural institutions, shopping centres, and recreational facilities.</p>
<p>1.4.3 Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:</p>	<p>Development of two high-rise apartment towers on the Site would broaden the range and mix of multiple-unit, market-based housing available in the White Oaks community. As discussed, this project would also help the City</p>

PPS Policy	Response
<p>b) permitting and facilitating:</p> <p>1. all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities;</p> <p>c) directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;</p> <p>d) promoting densities for new housing which efficiently use land, resources, infrastructure, and public services facilities, and support the use of active transportation and transit in areas where it exists or is to be developed.</p>	<p>accommodate its forecasted population growth and projected housing requirements.</p> <p>Preliminary studies have been completed by MTE to confirm that servicing infrastructure is available to meet projected needs. Additionally, it is anticipated that existing public service facilities available in the vicinity of the property would accommodate the projected demands of this development.</p> <p>This development plan would utilize existing land and servicing resources in an efficient manner and would be supported by the road transportation system, the active transportation network, and transit services.</p>
<p>1.5.1 Healthy, active communities should be promoted by:</p> <p>a) Planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate active transportation and community connectivity.</p>	<p>The proposal incorporates two key elements to help support healthy, active communities. Firstly, active transportation and social interaction would be encouraged by the provision of walkway connections to municipal sidewalks and mall walkways, outdoor (rooftop) amenity areas, and bicycle storage areas. Secondly, to promote community connectivity, the proposal supports the introduction of intensive housing forms within an established development node proximate to existing neighbourhoods, employment</p>

PPS Policy	Response
	opportunities, institutional uses, recreational facilities, public transit and the City's active mobility network.
<p>1.6.1 Infrastructure and public service facilities shall be provided in an efficient manner that prepares for the impacts of a changing climate while accommodating projected needs. Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they are:</p> <ul style="list-style-type: none"> a) financially viable over their life cycle, which may be demonstrated through asset management planning; and b) available to meet current and projected needs. 	<p>Preliminary servicing reviews have been carried out by MTE to confirm that the development can proceed in a cost-effective manner, and to ensure that the necessary infrastructure is available to meet projected needs. As discussed, it is anticipated that the development can be accommodated by existing public service facilities.</p>
<p>1.6.7.2 Efficient use shall be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.</p> <p>1.6.7.3 As part of a multimodal transportation system, connectivity within and among transportation systems and modes should be maintained and, where possible, improved including connections which cross jurisdictional standards.</p> <p>1.6.7.4 A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.</p>	<p>RC Spencer Associates Inc. (RC Spencer) completed a Transportation Impact Assessment (TIA) for the proposal. Generally, RC Spencer concludes in the associated study report, dated January 2024, that the proposed development will not adversely impact area traffic operations. RC Spencer further concludes that the project does not require any specific development-driven road system improvements.</p> <p>The Site is located within convenient walking distance of existing London Transit services including a future Rapid Transit Station along Wellington Street. The LTC transfer system provides connectivity throughout the City and to regional transportation facilities (e.g.,</p>

PPS Policy	Response
	<p>London International Airport, VIA Rail Station).</p> <p>The proximity of the Site to service/retail commercial uses, established residential neighbourhoods, employment opportunities, community facilities and parks would help future residents minimize the length and frequency of vehicle trips. Convenient access to the City's sidewalk and cycling network would also encourage active transportation. Furthermore, introducing an intensive, residential development on the Site would support existing and future investments in public transit.</p>
<p>1.7.1 Long-term economic prosperity should be supported by:</p> <ul style="list-style-type: none"> b) encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce; c) optimizing the long-term availability and use of land, resources, infrastructure and public service facilities; d) maintaining and, where possible, enhancing the vitality and viability of downtowns and mainstreets; 	<p>This proposal has been designed to optimize the use of the subject lands for residential use as part of a master planned redevelopment of the parking areas surrounding White Oaks Mall. The Site benefits from close proximity to arterial road transportation networks, transit services, and public facilities. It is expected that residents of the proposed development would support these services and facilities. It is also anticipated that the residents would contribute to the long-term vitality of existing service/retail commercial uses within White Oaks Mall and, more broadly, the Wellington/Bradley node.</p>
<p>1.8.1 Planning authorities shall support energy conservation and efficiency, improved air quality, reduced</p>	<p>The project supports the intensive use of lands: designated for residential purposes; situated within</p>

PPS Policy	Response
<p>greenhouse gas emissions, and preparing for the impacts of a changing climate through land use and development patterns which:</p> <ul style="list-style-type: none"> a) promote compact form and a structure of nodes and corridors; b) promote the use of active transportation and transit in and between residential, employment (including commercial and industrial) and institutional uses and other areas; e) encourage transit-supportive development and intensification to improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion; 	<p>an established development node; and connected via active transportation networks and public transit to residential neighbourhoods, employment areas, educational institutions and parkland.</p> <p>As discussed, development of this project would further broaden housing choice and housing supply in White Oaks community. Moreover, the intensive nature of this development would support existing transit services and future transit investments. It is also expected that the proximity of subject lands to the above-noted mix of land uses would reduce commuting requirements for residents and employees (thereby decreasing transportation congestion).</p>

The 2020 Provincial Policy Statement seeks to achieve healthy, livable and safe communities by promoting efficient development and land use patterns. Given the foregoing assessment, in our opinion the proposed project is consistent with this broad vision. In this regard, the intended development plan:

- Represents a compact building form that would intensify an existing commercial centre situated within an established development node and designated for residential uses;
- Introduces an intensive residential type that: has regard for the existing development context; provides a pedestrian orientation; encourages active transportation; and is serviced by the City's arterial road network and transit services;
- Proposes 568 apartment units to broaden multiple-unit housing choice and housing supply for current and future residents of White Oaks, and assists the City in meeting its projected demand for high density residential units; and,

- Promotes a scale of residential development that would (1) contribute to the optimization of municipal investments in servicing infrastructure and public transit, (2) support the vitality and viability of commercial activities proximate to the Site, and (3) generate tax revenues to benefit the financial well-being of the Province and the City.

In light of these considerations and our broader evaluation of this proposal relative to the policies of the PPS, it is our opinion that this development proposal is consistent with this policy document.

4.2 City of London Official Plan (The London Plan)

4.2.1 Status

The City of London Council adopted a new Official Plan on June 23, 2016 and the Ministry of Municipal Affairs issued its approval of The London Plan, with modifications, on December 30, 2016. Several policies and schedules of this Official Plan applicable to the Site were appealed, and were subject to adjudication by the Ontario Land Tribunal and its predecessors (Case No. OLT-22-002286). The Tribunal, in its Decision issued May 25, 2022, resolved the final phase of the general policy appeals and ordered The London Plan to be fully in-force (excluding outstanding site-specific appeals that do not relate to the subject lands).

4.2.2 Place Type (Map 1)

Figure 12 of this Report illustrates that the project Site is designated Transit Village pursuant to Map 1 (Place Types) of The London Plan.

Figures 2 and 3 of The London Plan also identify that the Site is located within the City's Built-Area Boundary and Primary Transit Area, respectively.

4.2.3 Policy Overview

Considering this land use framework and the scope of the proposal, it is our opinion that the Our Strategy, Our City, City Building, Place Type, and Our Tools parts of The London Plan contain policies applicable to project.

The following discussion (1) summarizes, in our opinion, the core policies of The London Plan respecting this proposal and (2) evaluates the merits of this project relative to this policy framework.

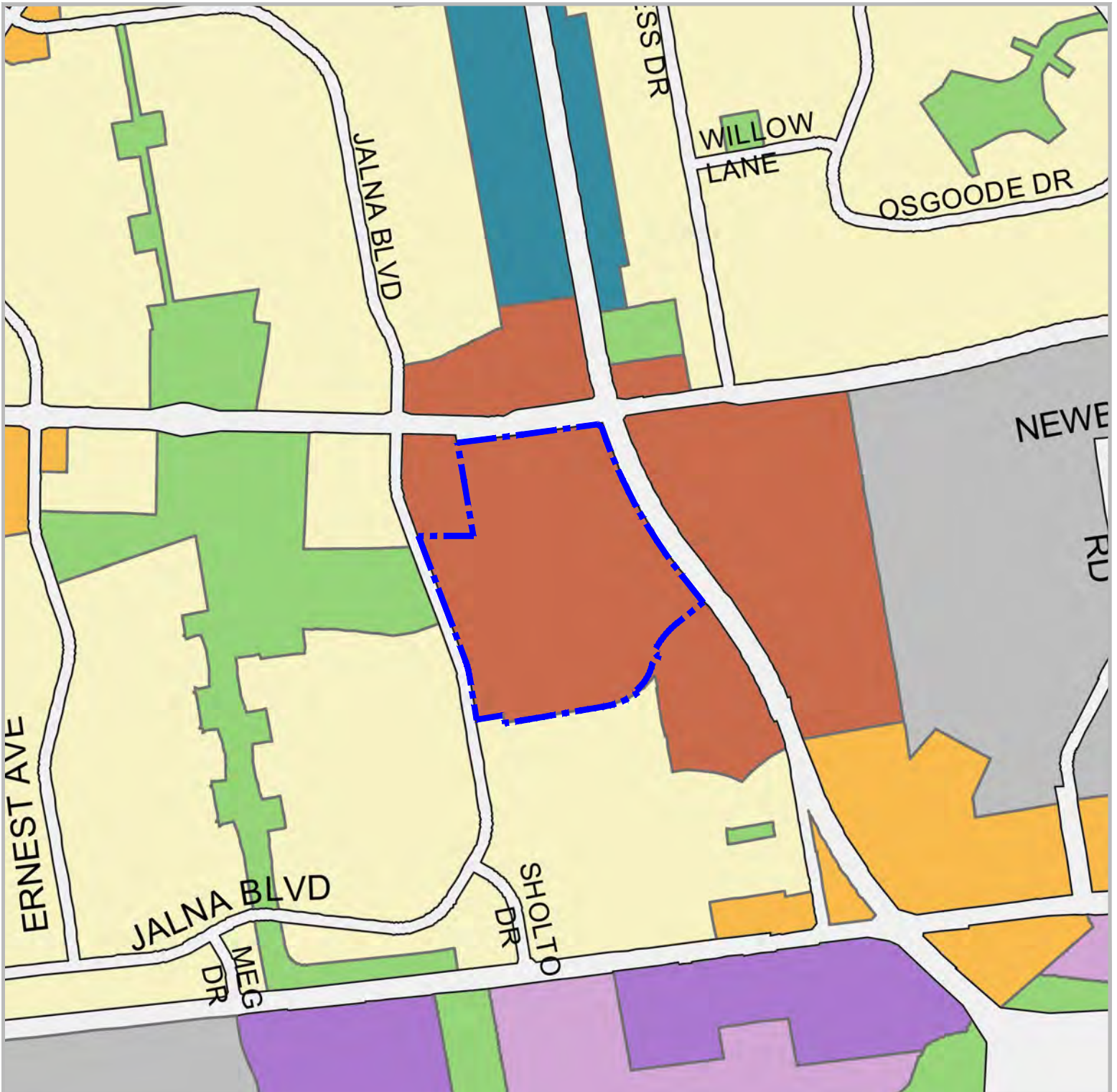











Figure 12
**The London Plan -
 Map 1 Place Types**

LEGEND

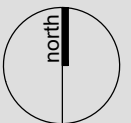
-  Subject Lands
-  Green Space
-  Transit Village
-  Rapid Transit Corridors
-  Shopping Area
-  Neighbourhoods
-  Light Industrial
-  Commercial Industrial
-  Institutional

Date: February 9, 2024

Scale: 1:1,000

File: 13198Q

Drawn: CCF



Q:\13198Q - 1105 Wellington Rd, London (White Oaks Mall)\Graphics\RPT\F_London
 Plan Map 1_09Feb2024.dwg

4.2.4 Our Strategy

The Our Strategy part of The London Plan contains a series of policies that address the core values, vision and key directions of the Plan to help guide planning and city building activities. The core values of this Official Plan are set out in Policy 52, and include a number of themes relating to development proposals (e.g., be collaborative, be innovative, think sustainable). Further, Policy 53 defines the vision for The London Plan to provide a focus for planning decisions: “London 2035: Exciting, Exceptional, Connected”.

Policies 54 to 63 define eight key directions to help achieve this broad vision and to guide planning development to the year 2035 (being The London Plan’s 20-year planning horizon). In our opinion, the following key directions and associated planning strategies have particular relevance to this proposal:

“55_ Direction #1 Plan strategically for a prosperous city

1. Plan for and promote strong and consistent growth and a vibrant business environment that offers a wide range of economic opportunities.
4. Revitalize our urban neighbourhoods and business areas.
11. Plan for cost-efficient growth patterns that use our financial resources wisely.

59_ Direction #5 Build a mixed-use compact city

1. Implement a city structure plan that focuses high-intensity, mixed-use development to strategic locations - along rapid transit corridors and within the Primary Transit Area.
2. Plan to achieve a compact, contiguous pattern of growth – looking “inward and upward”.
3. Sustain, enhance, and revitalize our downtown, main streets, and urban neighbourhoods.
4. Plan 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.
5. Ensure a mix of housing types within our neighbourhoods so that they are complete and support aging in place.

60_ Direction #6 Place a new emphasis on creating attractive mobility choices

5. Focus intense, mixed-use development to centres that will support and be served by rapid transit integrated with walking and cycling

6. Dependent upon context, require, promote, and encourage transit-oriented development forms.

61_ Direction #7 Build strong, healthy and attractive neighbourhoods for everyone

1. Plan for healthy neighbourhoods that promote active living, provide healthy housing options, offer social connectedness, afford safe environments, and supply well distributed health services.
2. Design complete neighbourhoods by meeting the needs of people of all ages, incomes and abilities, allowing for aging in place and accessibility to amenities, facilities and services.
3. Implement “placemaking” by promoting neighbourhood design that creates safe, diverse, walkable, healthy, and connected communities, creating a sense of place and character.

62_ Direction #8 Make wise planning decisions

1. Ensure that all planning decisions and municipal projects conform with The London Plan and are consistent with the Provincial Policy Statement.
2. Plan for sustainability – balance economic, environmental, and social considerations in all planning decisions.
4. Plan so that London is resilient and adaptable to change over time.
8. Avoid current and future land use conflicts – mitigate conflicts where they cannot be avoided.
9. Ensure new development is a good fit within the context of an existing neighbourhood.”

It is our opinion that the proposed high-rise tower arrangement supports the key directions set out in the referenced policies, as this development plan:

- Promotes intensive, compact design that efficiently utilizes servicing infrastructure and supports existing transit service and future transit investments;
- Intensifies the use of the subject lands in a manner that would: function cohesively within the existing shopping centre on the Site; collectively support the long-term vitality of the Wellington/Bradley node; and promote a walkable and connected community;
- Broadens the range of multiple-unit housing available within the White Oaks community to respond to market demand;

- Introduces prominent tower forms to (1) support the inward and upward development pattern encouraged by The London Plan and (2) contribute to a diverse and definable community character; and,
- Incorporates a land use pattern that: is in keeping with Provincial and City planning policies; is compatible with the local development context; and should not generate adverse land use impacts.

With respect to 'fit' considerations, several design elements are incorporated into the development concept to promote compatibility with these surrounding uses, including:

- Positioning the buildings towards Bradley Avenue to maintain and extend the existing street wall along these corridors;
- Providing podium elements adjacent to Bradley Avenue: to reference mid-rise building heights along the frontage; to enhance the pedestrian environment at the street level; to further transition building heights to integrate the building form into the surrounding context; and to help screen at-grade parking to minimize the visual impact of parking facilities from the street; and,
- Incorporating a cohesive, contemporary architectural style emphasizing a pedestrian scale at the street level and employing extensive glazing, balconies, and centralized material patterns to help break up the continuous mass of the structures.

4.2.5 Our City

4.2.5.1 Overview

The Our City part of The London Plan contains policies and schedules relating to the City Structure Plan that have particular relevance to this project.

Policy 69 of this Official Plan states that the City Structure Plan establishes a framework for London's growth for the 20-year planning horizon and informs other policies of the Plan. Policy 70 of this Official Plan further prescribes that, "All of the planning we do will be in conformity with the City Structure Plan ... Planning and development applications will only be approved if they conform with the City Structure Plan."

Policy 69 also identifies that the City Structure Plan is set out in five associated frameworks: growth, green, mobility, economic, and community. Policies 71 to 146 provide direction relating to each of these frameworks. Within this policy structure, it is identified that the subject property is located within the City's Urban Growth Boundary and Built-Area Boundary pursuant to Figures 1 and 2 of The London Plan, respectively, of the Growth Framework. The Site is also situated within the City's Primary Transit Area as delineated on Figure 3.

In our opinion, the introduction of residential high-rise towers on lands within the Transit Village place type has regard for applicable policies and schedules relating to the five frameworks of the City Structure Plan. Most notably, the plan addresses the intensification objectives of the Built-Area Boundary and the Primary Transit Area components of the growth framework.

4.2.5.2 Built-Area Boundary/Primary Transit Area

With respect to the specific policy direction for the Built-Area Boundary and the Primary Transit Area, The London Plan sets out the following objectives pursuant to Policies 90 and 91:

“90_The Primary Transit Area will be a focus of residential intensification and transit investment within London. It includes the Transit Villages and the Rapid Transit Corridors. The nature and scale of intensification will vary depending on the Place Type within the Primary Transit Area and will be a good fit within existing neighbourhoods. The Primary Transit Area will also have a heightened level of pedestrian and cycling infrastructure to service and support active mobility and strong connections within these urban neighbourhoods.

91_Directing infill and intensification to this area is a major part of this Plan’s strategy to manage growth in the city as a whole and to target 45% of all future residential growth in the Built-Area Boundary.”

Further, Policy 92 incorporates the following associated provisions that, in our opinion, have relevance to this proposal:

- “3. To promote intensification in the Primary Transit Area, it is an objective of this Plan that 75% of the intensification target will be in the Primary Transit Area.
5. The City Design Policies will be applied in the review of municipal projects and planning and development applications to enhance and protect residential amenity in the Primary Transit Area.
6. Municipal servicing within the Primary Transit Area will be planned to recognize the greater population density and heightened demand for services in this area and also recognizing the heightened demand for active mobility.
7. Municipal urban regeneration initiatives will be focused on neighbourhoods and business areas within the Primary Transit Area ...
8. Development within the Primary Transit Area should be designed to be transit-oriented and well serviced by cycling lanes and paths, sidewalks, urban public spaces, and public seating areas.”

It is our opinion that the proposed development plan supports the aforementioned policy direction for the Built-Area Boundary and the Primary Transit Area, as the project would:

- Direct intensification to an appropriate place type and a location that can accommodate the intended use and is serviced by the City's arterial road network, transit and active transportation systems;
- Employ a high standard of urban design;
- Support high density residential development to support the diversification, intensification and overall vitality of the Wellington/Bradley node; and
- Provide a transit-oriented development within convenient walking distance of London Transit services, including the Rapid Transit Station planned for Wellington Road along the frontage of White Oaks Mall (**Figure 13**). The Site is also well serviced by municipal sidewalks, mall walkways and cycling lanes.

Figure 13: Proposed Tower Massing, View North with Century Centre Concept and Proposed Major Transit Station Site

Source: Zedd Architecture



Additionally, Our City policies detail the City's strategy for growth servicing and financing (Policies 166 to 183). The principal objective of these policies is described in Policy 166: "The city's structure could not operate successfully without sustainable, secure, reliable, and affordable infrastructure". Further, Policy 168 states that

municipal services will be planned on a long-term basis to support the City Structure Plan.

In our opinion, the following policies of this Official Plan section have particular relevance to this proposal:

“172_ The City shall be satisfied that adequate municipal infrastructure services can be supplied prior to any development or intensification proceeding

173_ Planning and development approvals will be discouraged where planned servicing capacity to accommodate the proposed use is not expected to become available within a five year time frame.

174_ Changes in place type and zoning that would result in the underutilization of previously planned and constructed municipal infrastructure will be discouraged.”

As identified in Table 3.0 of this Report, a preliminary servicing review has been completed by MTE to confirm that (1) the development can proceed in a cost-effective manner and (2) the necessary servicing infrastructure would be available to meet projected needs.

As also summarized in Table 3.0, the property is designated for residential purposes and to permit high-rise forms. Further, this project would have access to, and would contribute to the optimization of, the arterial road transportation network, transit services, municipal servicing infrastructure, active transportation infrastructure, and public service facilities.

Given these considerations, in our opinion, this proposal confirms to the City Structure Plan defined within The London Plan.

4.2.5.3 Transit Village and Rapid Transit Corridors

The Our City part also provides City Structure Plan policies pertaining to the Downtown, Transit Villages, and Rapid Transit Corridor place types, which are generally delineated on Figure 5 of this Official Plan and include the Site. Policy 95 acknowledges that all of these place types are to (1) allow for intense, mixed-use neighbourhoods and business areas and (2) help to make rapid transit viable in London.

Further Policy 98 provides planning direction for these rapid transit-oriented place types:

“98_ In conformity with the City Structure Plan the following actions will be taken:

2. Plan for four Transit Villages that support intense forms of mixed-use development.
4. Plan for a high level of residential amenity and public service within the Downtown, Transit Villages and Rapid Transit Corridors.
5. Utilize the Transit Villages and Rapid Transit Corridors to create abundant opportunities for growth and development that can be achieved in a cost-efficient way.”

In our opinion, the proposal is supportive of the referenced policies, as this project:

- Introduces high density residential types to compliment existing commercial space on the lands, resulting in intensification and a greater mix of uses within the mall site;
- Employs a high standard of urban design (1) to contribute positively to the White Oaks community (2) to further frame the Wellington/Bradley node and (3) to connect with, and support, pedestrian, cycling and transit opportunities proximate to this area; and
- Utilizes existing infrastructure to support an efficient development pattern, increase the housing supply in White Oaks and further diversify housing choice within a designated Rapid Transit Village on property fronting a designated Rapid Transit Corridor (Wellington Road).

4.2.6 City Design

Within the City Building part of this Official Plan, the City Design chapter provides a series of guidelines with respect to urban design. Policies 189 to 306 of this Official Plan define the City Design policies that are intended to guide the character and form of development.

The overarching objectives of these policies are outlined in Policy 193:

“In all of the planning and development we do and the initiatives we take as a municipality, we will design for and foster:

1. A well-designed built form throughout the city.
2. Development that is designed to be a good fit and compatible within its context.
3. A high-quality, distinctive and memorable city image.
4. Development that supports a positive pedestrian environment.

5. A built form that is supportive of all types of active mobility and universal accessibility.
6. High-quality public spaces that are safe, accessible, attractive and vibrant.
7. A mix of housing types to support ageing in place and affordability.
8. Sustainably designed development that is resilient to long-term change.
9. Healthy, diverse and vibrant neighbourhoods that promote a sense of place and character."

In our opinion, the project description, concept plan, and renderings included in this Report demonstrate that the development proposal has been designed to achieve these broad objectives, where applicable. Further, it is our opinion that the project design aligns with the intent of the character, streetscape, public space, site layout, and building form policies set out in the City Design chapter. Of particular relevance to this proposal are City Design policies related to the neighbourhood character, placemaking, and high-rise buildings, including the following:

"197_ The built form will be designed to have a sense of place and character consistent with the planned vision of the place type, by using such things as topography, street patterns, lotting patterns, streetscapes, public spaces, landscapes, Site layout, buildings, materials and cultural heritage.

199_ All planning and development proposals within existing and new neighbourhoods will be required to articulate the neighbourhood's character and demonstrate how the proposal has been designed to fit within that context.

...

220_ Neighbourhoods should be designed with a diversity of lot patterns and sizes to support a range of housing choices, mix of uses and to accommodate a variety of ages and abilities.

252_ The site layout of new development should be designed to respond to its context and the existing and planned character of the surrounding area.

253_ Site layout should be designed to minimize and mitigate impacts on adjacent properties.

256_ Buildings should be sited so that they maintain and reinforce the prevailing street wall or street line of existing buildings. ...

268_ Sites shall be designed to provide a direct, comfortable and safe connection from the principal building entrance to the public sidewalk.

269_ Buildings should be sited to minimize the visual exposure of parking areas to the street.

289_ High and mid-rise buildings should be designed to express three defined components: a base, middle, and top. Alternative design solutions that address the following intentions may be permitted.

1. 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.
2. The middle should be visually cohesive with, but distinct from, the base and top.
3. The top should provide a finishing treatment, such as a roof or a cornice treatment, to hide and integrate mechanical penthouses into the overall building design.

292_ 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 into the right-of-way, and reduce the wind impacts.

293_ 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. High rise buildings should not be designed with long axes where they create an overwhelming building mass.

298_ Design measures relating to building height, scale and massing should be used to provide a transition between development of significantly different intensities, considering the existing and planned context."

Given commentary provided in this Report including the design review provided in Section 3.3, it is our opinion that the proposed high-rise tower arrangement is in keeping with the aforementioned design direction. Most notably, the tower designs are collectively intended to: promote a definable sense of place; integrate within the local development context; effectively transition height and massing; and utilize efficient tower floor plates to minimize potential impacts on adjacent properties.

The following represent related urban design considerations that, in our opinion, also align with the referenced City Design policies:

- The proposed podium integrates articulated elevations, prominent entrances, and reduced building setbacks to help enhance the pedestrian character and street edge along Bradley Avenue (refer to **Figure 14**). In effect, the podium component and the associated towers would help establish a more prominent nodal form while also further framing this major intersection and generally reflecting development recently approved across Bradley Avenue (Century Centre);
- The towers feature floor plates (below 1,000 m² each) that are offset from one another, reducing massing, shadow, and overlook concerns;
- The parking arrangement for the towers is comprised of structured parking within the podium element. Further, the positioning of the building mass and height of the podium component would help screen existing surface parking areas within the mall site from Bradley Avenue;
- Pedestrian walkways and hardscaping elements are provided from adjacent sidewalks to promote an enhanced pedestrian realm;
- Podium elements would include direct entrances from Wellington Road and the interior mall parking area to support active transportation and convenient access to public transit stops (refer to **Figure 15**); and,
- Existing vehicular accesses to the Site would be maintained to minimize the potential impacts on traffic movement in the vicinity of the Bradley Avenue / Montgomery Road intersection.

Figure 14: Podium as Viewed from Bradley Avenue

Source: Zedd Architecture



Figure 15: Podium as Viewed from Internal Mall Street (South of Montgomery Road)

Source: Zedd Architecture



4.2.7 Transit Village Place Type

As discussed, the Site is located within the Transit Village place type. Generally, Policies 807 and 808 of The London Plan describe that this place type: is applied to mixed-use areas that are centrally located around rapid transit stations; is intended to support the City's rapid transit system; and is to promote development supportive of active transportation opportunities to help reduce traffic congestion. Policy 809 identifies that areas designated Transit Village are existing built-up areas with opportunities for infill, redevelopment, and a more efficient use of land.

Policy 811 states that a broad range of residential, retail, service, office, cultural, institutional, hospitality, entertainment, recreational, and other related uses are permitted in Transit Villages. This Policy also states that mixed-use buildings are encouraged. With respect to development intensity, Policy 813 and Table 8 of the Official Plan prescribe that the standard maximum building height within Transit Villages is 15 storeys, with the upper maximum height being 22 storeys. Prescribed building heights are exclusive of Secondary Plan permissions and site-specific permissions. Policy 813 further identifies the following in relation to the review of development applications within this place type:

“Planning and development applications within the Transit Village Place Type will be evaluated to ensure that they provide for an adequate level of intensity to support the goals of the Place Type, including supporting rapid transit, efficiently utilizing infrastructure and services, ensuring that the limited amount of land within this place type is fully utilized, and promoting mixed-use forms of development.”

Given this policy framework, in our opinion the components of this proposal are consistent with those intensity provisions: supporting the introduction of residential development into an existing commercial site within a Rapid Transit Village; encouraging the efficient use of land, infrastructure and services; and promoting a mix of land uses and active transportation opportunities. The proposal does not conform with Policy 813_1 and Table 8 of The London Plan, which prescribe that buildings in this place type are to have an upper maximum height of 22 storeys.

Accordingly, an OPA is necessary to permit building forms on the Site having a maximum height of 32 storeys (excluding the mechanical penthouse). **In our opinion, to implement the project under the policies of The London Plan, this amendment would need to (1) add a Specific Area policy for the Transit Village place type and (2) delineate the subject lands on Map 7 (Specific Policy Areas).**

Policy 814 sets out a several policies respecting built form for Transit Villages. In our opinion, the following policies are relevant to this proposal:

- “1. All planning and development applications will conform with the City Design policies of this Plan.
2. High-quality architectural design will be encouraged within Transit Villages.
3. Buildings and the public realm will be designed to be pedestrian, cycling and transit-supportive through building orientation, location of entrances, clearly marked pedestrian pathways, widened sidewalks, cycling infrastructure, and general Site layout that reinforces pedestrian safety and easy navigation.
5. Consideration should be given to providing publicly-accessible pedestrian connections through a proposed development Site connecting with the pedestrian network on existing and future adjacent Sites.
7. The base of all buildings will be designed to establish and support a high-quality pedestrian environment.
8. Pedestrian traffic associated with rapid transit stations should be considered in the design of the station, the public realm, and adjacent developments.
9. Massing and architecture within the Transit Village should provide for articulated façades and rooflines, accented main entry points, and generous use of glazing and other façade treatments along sidewalk areas such as weather protection features to support a quality pedestrian environment.
10. Creative and distinctive forms of building design are encouraged within the Transit Villages.
11. Surface parking areas should be located in the rear and interior sideyard. Underground parking and structured parking integrated within the building design is encouraged.
13. Planning and development applications will be required to demonstrate how the proposed development can be coordinated with existing, planned and potential development on surrounding lands within the Transit Village Place Type.”

It is our opinion that the proposed development is in keeping with the above-referenced policies, in light of the following key considerations:

- The proposed development aligns with the City Design policies as discussed in the previous Section of this Report;
- The high-rise towers would integrate a high standard of architectural design that would also: promote distinctive building forms; support transit services and active transportation; and integrate structured parking; and,

- The podium elements of the proposed towers are positioned in close proximity to the Bradley Avenue street frontage to help reinforce the prevailing street wall within that streetscape. Architectural elements associated with the podium are also intended to achieve visual articulation and soften the massing of the building at grade (e.g., colour/material variation, extensive glazing, entrance canopies). Further, pedestrian connections associated with the podium would contribute to a cohesive development that is intended to support the intensification, and long-term vitality of the associated Transit Village.

4.2.8 Protected Major Transit Station Areas

The Site forms part of a Transit Village Protected Major Transit Station Area (TVPMTSA) as delineated on Map 10 (Protected Major Transit Station Areas) of this Official Plan. The following are policies prescribed for TVPMTSAs:

“815A_ All Transit Villages are identified as Protected Major Transit Station Areas, as shown on Map 10.

815B_ Each Transit Village Protected Major Transit Station Area will be planned to achieve a minimum number of 150 residents and jobs combined per hectare.

815C_ Within the Transit Village Protected Major Transit Station Areas, the minimum building height is either two storeys or eight metres and the maximum building height is 22 storeys.

815D_ Within the Transit Village Protected Major Transit Station Areas, the minimum density is 45 units per hectare for residential uses or a floor area ratio of 0.5 for non-residential uses.

815E_ In the Transit Village Protected Major Transit Station Areas, a broad range of residential, retail, service, office, cultural, institutional, hospitality, entertainment, recreational, and other related uses may be permitted. Mixed-use buildings will be encouraged.

815F_ Development within the Transit Village Protected Major Transit Station Areas will conform with all other policies of the London Plan including the Transit Village Place Type and any Specific Area Policies.”

It is our opinion that the proposed development is generally consistent with the above-referenced policies, in light of the following considerations:

- As discussed, the Site is located within a defined Transit Village place type (addressing Policy 815A).
- Based on the following methodology and density values set out in the City of London 2021 Development Charges Background Study Update (draft), dated June

2020, the proposal aligns with the minimum expectation for residents per hectare prescribed in Section 815B:

- Total development area: 0.83 ha;
 - Total dwelling units at build-out: 568 units;
 - Total population at build-out (568 units x 1.68 persons/unit): 955 persons;
 - Total residents and jobs per hectare (955 persons/jobs ÷ 0.83 ha): 1,150.
- With inclusion of the proposed towers, the Site would yield a residential density of 685 units/ha. In our opinion the intensity requirements of Policy 815D are satisfied (i.e., the proposed residential density exceeds 45 units/ha).
 - With implementation of this proposal, a mix of residential and service/retail commercial uses would be accommodated within the White Oaks Mall lands. As discussed, these intended uses are consistent with the permissions of Policy 815E.
 - The proposed development would conform to all other policies of The London Plan, with consideration for the proposed Specific Area policy discussed in Section 4.3.10 of this Report. This site-specific permission would allow for a maximum building height of 32 storeys within the subject lands (which exceeds the permission defined in Policy 815C).

4.2.9 Impact Mitigation

Policy 1638 prescribes that a site-specific ZBA is required for a project to exceed the standard maximum height and an OPA is also required for a project to exceed the upper maximum height. With respect to the associated ZBA process, it is further stated in Policy 1640 that, "Through the amendment process the community, City Council and other stakeholders can be assured that measures will be implemented to mitigate any impacts of additional height or density." Policy 1641 further states that increases in form and intensity may be permitted where the proposed development represents good planning within its context.

To address the direction set out in the aforementioned policies, as itemized below, Westdell is proposing several design elements to integrate the project into the local development setting and to mitigate potential land use impacts associated with the proposed 32 storey building height.

Planned Mitigation Measures:

- **Site/Building Design.** As discussed in this Report, collectively the building design and site layout of the tower arrangement incorporates contemporary architectural themes and design elements to promote compatibility with surrounding land uses and the development context proximate to the Wellington/Bradley node. Shadow impacts have been assessed and are minimized through the proposed building

elements including efficient tower floor plates that are set back from the podium and offset (**Figure 16**). Recessed building entrances are also anticipated to reduce wind impacts on the pedestrian realm. Additionally, vehicular parking is to be accommodated within the podium with one floor of commercial parking for the mall additionally provided underground;

- Sustainable Development. The proposed tower development would be designed with consideration for suitable sustainability techniques, materials and systems. Additionally, landscape plans for common outdoor amenity areas would consider sustainable design elements; and,
- Active Transportation. Secure bicycle storage would be provided in the parking structure for building residents. Walkway connections from the tower podium and surface parking field would provide additional connectivity to street frontages, bike lanes, and transit stops.

**Figure 16: Development from Bradley Avenue (South View),
Demonstrating Offset Towers and Podium Elements**

Source: Zedd Architecture



Given the foregoing and commentary provided in this Report, in our opinion the additional building height associated with this project is (1) appropriate for the local

development context and (2) mitigated by design elements intended for the project. It is therefore our opinion that the proposal aligns with the considerations for additional building height set out in Policies 1638 and 1640.

4.2.10 Our Tools

4.2.10.1 Guideline Documents

Within the Our Tools part of the Official Plan, Policy 1712 identifies that, “City Council may adopt guideline documents to provide direction for the implementation of the policies of this Plan or to guide development of a specific area”. Policy 1716 itemizes a number of approved guidelines, including the City of London Placemaking Guidelines which, in our opinion is particularly relevant to this proposal.

City of London Placemaking Guidelines

The City of London Placemaking Guidelines, dated November 2007, are intended to promote liveable communities, an identifiable character and a sense of place. In our opinion, a number of goals and themes set out in this document are relevant to this intensification proposal.

The following summarizes the principal (core) guidelines that generally provided design direction for this project, noting that the design response to these considerations is largely addressed within this Report and illustrated within the associated Appendices.

Site Context and Community Elements:

- Establish key social, pedestrian and public transit connections between new development and the existing fabric of the city.
- Identify key streetscapes and coordinate the conceptual design and location of landscaping and built forms.
- Buildings should be located close to the street and should be architecturally articulated to provide an appropriate level of detail that would visually animate the streetscape.

Focal Points and Public Realm:

- Utilize paving and landscaping treatments in the design of visual focal points.
- Design convenient pedestrian linkages to focal points and public transit.
- Employ exterior building materials and colours that are stylistically appropriate.

- Avoid architectural designs that are ubiquitous and non-descript because they do not contribute to a sense of place.

Pedestrian Environments:

- Design pedestrian environments that provide a sense of safety and separation from automobile traffic.
- Orient buildings, their massing, architectural elements and habitable areas so that they promote an eyes-on-the-street approach to streetscapes and public spaces.
- Use architectural and landscape design to enhance visually prominent locations.
- Design buildings and spaces to encourage social interaction.

4.2.10.2 Evaluation Criteria

The proposed use of the Site has been evaluated in the context of the Evaluation Criteria for Development Applications policies of the Our Tools part of The London Plan (Policies to 1577 to 1579).

With respect to the defined criteria set out in these Policies, in our opinion, the proposal demonstrates consistency with the PPS and generally conformity with provisions of The London Plan; recognizing that the intensity of the project requires a Specific Area permission to conform with this Official Plan. With consideration for studies completed in conjunction with these applications, it is also our opinion that the intended design components of the planned high-rise and the associated site layout should not generate significant land use impacts, particularly in relation to loss of privacy, shadowing and visual impacts and traffic management. Further commentary presented in this Report identifies that, in our opinion, the project represents an appropriate development for the subject lands and would fit effectively within the local development setting (**Figure 17**).

Figure 17: Proposed Tower Arrangement, View South with Century Centre Concept and Proposed Major Transit Station Site

Source: Zedd Architecture



4.2.11 Specific Area Policies

Policy 1730 of The London Plan states that, in limited circumstances, adoption of policies for Specific Areas may be considered where five conditions are satisfied. The following evaluates the proposal relative to each condition:

"1. The proposal meets all other policies of the Plan beyond those that the specific policy identifies."

Based on our review of The London Plan policies and permissions, in our opinion, this residential development proposal satisfies all policies of the Plan other than the standard and upper maximum building height permissions.

"2. The proposed policy does not have an adverse impact on the integrity of the place type policies or other relevant parts of this Plan."

The OPA application seeks to exceed the 22 storey upper maximum building height permissions of the Transit Village place type and TVPMTSAs. In our opinion, the merits of this proposal set out in this Report warrant the requested 32 storey building height (e.g., contemporary building design; compatibility with local development context; complementary design and uses; proximity to shopping, employment, transit, bike lanes and pathways, arterial road systems and existing high-rises).

Given these design and locational merits, and related commentary in this Report, in our opinion this proposal would not adversely impact on the integrity of the associated Transit Village place type and TVPMTSA policies, or applicable City Design policies.

"3. The proposed use is sufficiently unique and distinctive such that it does not establish an argument for a similar exception on other properties in the area."

As discussed in this Report, this project would integrate two prominent high-rise towers on a Site that: can accommodate the intended use cohesively within the existing mall context; is supported by the arterial road network, public transit and active transportation systems; is located within an established commercial node; is situated in proximity to existing and planned apartment buildings; and is designated for residential/commercial purposes and high-rise development. In our opinion, this proposal represents a site-specific intensification opportunity that would not establish a precedent for other properties in the vicinity of the subject lands.

"4. The proposed use cannot be reasonably altered to conform to the policies of the place type."

The massing, orientation and articulation of the proposed high-rise towers are designed: to be compatible with surrounding land uses; to complement the local development context; to promote compact, efficient development; and to support intensification within a designated Transit Village. In this respect, the requested building height permits the proposed unit yield to be contained within efficient tower forms while also accommodating amenity areas, residential units, and parking in the tower podiums. In our opinion, the configuration and design elements of the podium and tower components contribute positively to the pedestrian-oriented streetscape along Bradley Avenue.

In order to bring the proposal into conformity with maximum height permissions, the tower height would need to be decreased to a maximum of 22 storeys, which would reduce the total unit yield if the proposed high-rise arrangement and floor plate configuration is maintained. In effect, this modification would reduce the level of intensification associated with this project and subsequently the ability of this project to promote housing choice and increase housing supply. Alternatively, additional towers or larger building floor plates could be introduced within the Site to provide yield comparable to the 568 units proposed for this development. In our opinion, both of these options would detract from the overall merits of the proposal as discussed in this Report. Accordingly, to achieve the design objectives for this project, it is our opinion that the tower design cannot be reasonably altered to align with the maximum building height permission of The London Plan.

"5. The proposed policy is in the public interest, and represents good planning."

Given planning rationale set out in this Report, with the benefit of the proposed Specific Area policy, in our opinion the applications are consistent with the policy direction and objectives of the Provincial Policy Statement and The London Plan. Accordingly, it is our opinion that for this proposed intensification project, a Specific Area policy represents good planning and would appropriately implement the intended tower arrangement.

Additionally, Policy 1732 of The London Plan states that all applications contemplating policies for Specific Areas are subject to the Planning and Development Applications component of the Plan. Specifically, Policy 1578 of the Plan sets out a variety of criteria to be considered when evaluating the merits of planning applications.

In our opinion, relevant matters set out in Policy 1578 have been contemplated in the building design and site layout, and related policies have been addressed in this Report. Most notably, Sub-Policy 6 identifies a number of potential impacts to nearby properties to be evaluated in the context of a development application. In our opinion, collectively, the design elements of this proposal satisfy several key considerations identified in this Sub-Policy, including traffic and access management, parking, privacy, shadowing and visual impacts. Additionally, with respect to Sub-Policy 7 which addresses 'fit', in our opinion the proposed tower arrangement and site layout is designed to be compatible with, and complementary to, the surrounding development context.

Given the foregoing, in our opinion, the proposal satisfies the framework of planning criteria prescribed in The London Plan for a Specific Area policy.

4.2.12 Community Consultation Strategy

With respect to compatibility considerations set out in Policy 1578, Westdell held an open house for this project on February 5, 2024 within a unit of the White Oaks Mall. The open house was advertised via a mailout, with notices provided to all addresses within 120 metres of the subject lands.

Fourteen presentation boards illustrating the proposed development were displayed, including a location plan, site plan, main floor plan, landscape plan, renderings, and details on the requested Planning Act applications.

Representatives from Westdell, MHBC, Zedd Architecture, and RCLA attended the open house to explain the proposal, answer questions, and receive feedback. The ward councillor was in attendance to receive feedback.

Twenty members of the public completed the sign in sheet, with an estimated 50 members of the public attending the open house. Comments from the public are summarized below:

- Use of the Site for intensified residential uses was generally positively received, with members of the public noting the availability of community amenities that support this residential use (public libraries, community centres, transit, and grocery stores) and that additional residents in the area could support commercial uses in the mall.
- The proposed increase in height and density received mixed reactions, with some residents supporting the changes to the neighbourhood and resulting additional housing choice and housing supply, and others concerned that the development may change the nature of the neighbourhood.
- For residents who expressed concerns, the main issue was related to residential density and the potential impacts of the proposed development when combined with the Century Centre development. More specifically, local residents were concerned that the increased population in the community would impact upon traffic movement and the sustainability of public facilities (e.g., schools, healthcare centres). The height of the buildings and impacts related matters (i.e. visual impacts, shadowing, wind gusts), were not commonly raised as key concerns. Overflow parking on nearby neighbourhood streets during busy shopping seasons was identified as an additional existing concern.
- There were questions related to why development and intensification is being directed to this area of the City.
- Residents also identified an ongoing concern regarding unsafe illegal driving in the parking lot of White Oaks Mall after operating hours.

Attendees were provided the opportunity to submit written comments during the open house or after. One written response was received and included suggestions for active transportation connections to the proposed development from the mall and Bradley Avenue and suggested visitor bicycle parking be provided within the parking structure. A master plan for the mall was requested.

Attendees were informed of the ability to participate in the formal Planning Act consultation process and that notification of the statutory public meeting will be provided by the City of London in accordance with municipal practices. In this respect, further public consultation for these planning applications is anticipated to be consistent with the requirements of the Planning Act.

4.2.13 Summary

In summary, it is our opinion that the proposed development supports the broad vision of The London Plan, as well as the direction and core objectives of Primary Transit Area and TVPMTSA policies. With provision of a Specific Area policy allowing for a maximum building height of 32 storeys (exclusive of the mechanical penthouse), the

proposal would also align with the development permissions prescribed for Transit Villages and TVPMTSAs. Moreover, the concept plan includes elements that support the urban design principles of the Official Plan and the design direction of the City's Placemaking Guidelines.

5.0 City of London Zoning By-law Z.-1

5.1 Existing Zoning

Figure 18 of this Report illustrates that the Site is zoned Regional Shopping Area (RSA4) pursuant to Schedule "A" of the City of London Zoning By-law No. Z.-1 (Zoning By-law).

As set out in Section 21 of the Zoning By-law, the parent RSA Zone permits a wide range of service/retail and office uses. Further, as prescribed in Table 21.3, the RSA4 Zone Variation establishes a maximum gross leasable floor area of 65,000 m² and a maximum building height of 24.0 m.

5.2 Proposed Zoning

Following an analysis of the Zoning By-law, it was concluded that the existing RSA4 zoning structure does not permit the intended building form or site layout. It was also concluded through this review that the proposed tower arrangement most closely aligns with the permissions of the Residential R10 Zone regime.

The Residential R10 (R10-5) Zone variation is proposed to accommodate this development layout. In this regard, pursuant to the permissions of Section 14 of the Zoning By-law, the R10-5 Zone variation supports a variety of intensive residential housing forms (e.g., apartment buildings, senior citizens apartments, continuum-of-care facilities) and permits a maximum residential density of 350 units/ha. The standard R10-5 Zone regulations do not specify a maximum building height.

It is anticipated that for this Site, a Residential R10 Special Provision (R10-5()*D750*H115) Zone would be compounded with the existing RSA4 Zone to accommodate the intended development layout. It is also anticipated that, at a minimum, this zoning structure would include site-specific permissions for increased height, reduced setbacks, and increased lot coverage.

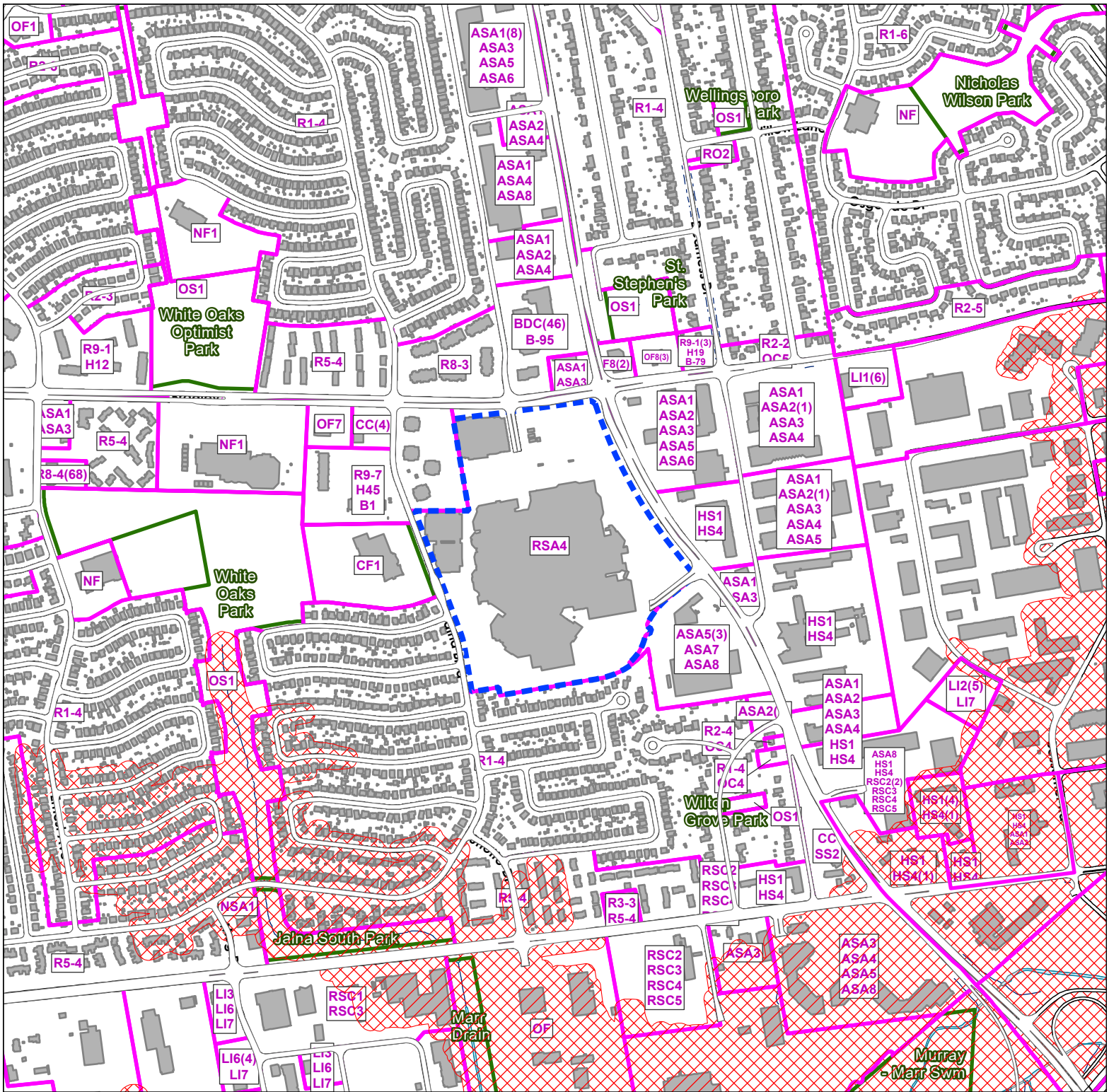





Figure 18
City of London
Existing Zoning
Zoning By-law No. Z.-1

Legend

-  Subject Lands
-  Z.-1 Zones
-  Conservation Authority Regulated Areas

- | | |
|--|--|
| R1 Residential R1 Zone | OS Open Space Zone |
| R2 Residential R2 Zone | RSA Regional Shopping Area Zone |
| R3 Residential R3 Zone | RSC Restricted Service Commercial Zone |
| R5 Residential R5 Zone | RO Restricted Office Zone |
| R8 Residential R8 Zone | BDC Business District Commercial Zone |
| R9 Residential R9 Zone | B Bonusing |
| CC Convenience Commercial Zone | H Height Maximum |
| CF Community Facility Zone | |
| HS Highway Service Commercial Zone | |
| ASA Associated Shopping Area Commercial Zone | |
| LI Light Industrial Zone | |
| NF Neighbourhood Facility Zone | |
| NSA Neighbourhood Shopping Area Zone | |
| OC Office Conversion Zone | |
| OF Office Zone | |

Source: CityMap, City of London (c) 2024

Date: February 7, 2024

Scale: 1:10,000

File: 13198Q

Drawn: CCF

Document Path: C:\Users\cfandrich\Documents\ArcGIS\Projects\Project_13198Q\Project_13198Q.aprx



Appendix F to this Report contains a Zoning Data Sheet prepared by MHBC for this project. This zoning review illustrates that the proposed building scale and site layout meet a number of the applicable R10-5 Zone regulations. However, a Site-specific R10-5 Zone variation is required under Section 14.4 of the Zoning By-law to address the following matters, and to provide flexibility to accommodate minor design modifications that may arise during project planning:

- Permit a Site-specific maximum building height of 115 m to reflect the planned 32 storey high-rise towers, inclusive of the rooftop amenity area;
- Prescribe a maximum residential density of 750 units/ha to permit intensive residential forms on the Site that would support the efficient use of existing infrastructure and public services;
- Reduce the front and interior yard setbacks to 1.5 m to support a pedestrian orientation and a more contiguous street wall;
- Reduce the rear yard setback to 7.5 m, recognizing that the rear yard interfaces with an interior mall driveway
- Establish a maximum lot coverage of 80% for the Site to permit the proposed intensification project in conjunction with the context of the larger mall development;
- Maintain all other standard permissions of the R10-5 zone.

Figure 19 of this Report illustrates the 'Regional Shopping Area/Residential R10 Special Provision (RSA4/R10-5()*D750*H115)' Zone proposed to accommodate the proposed tower arrangement.

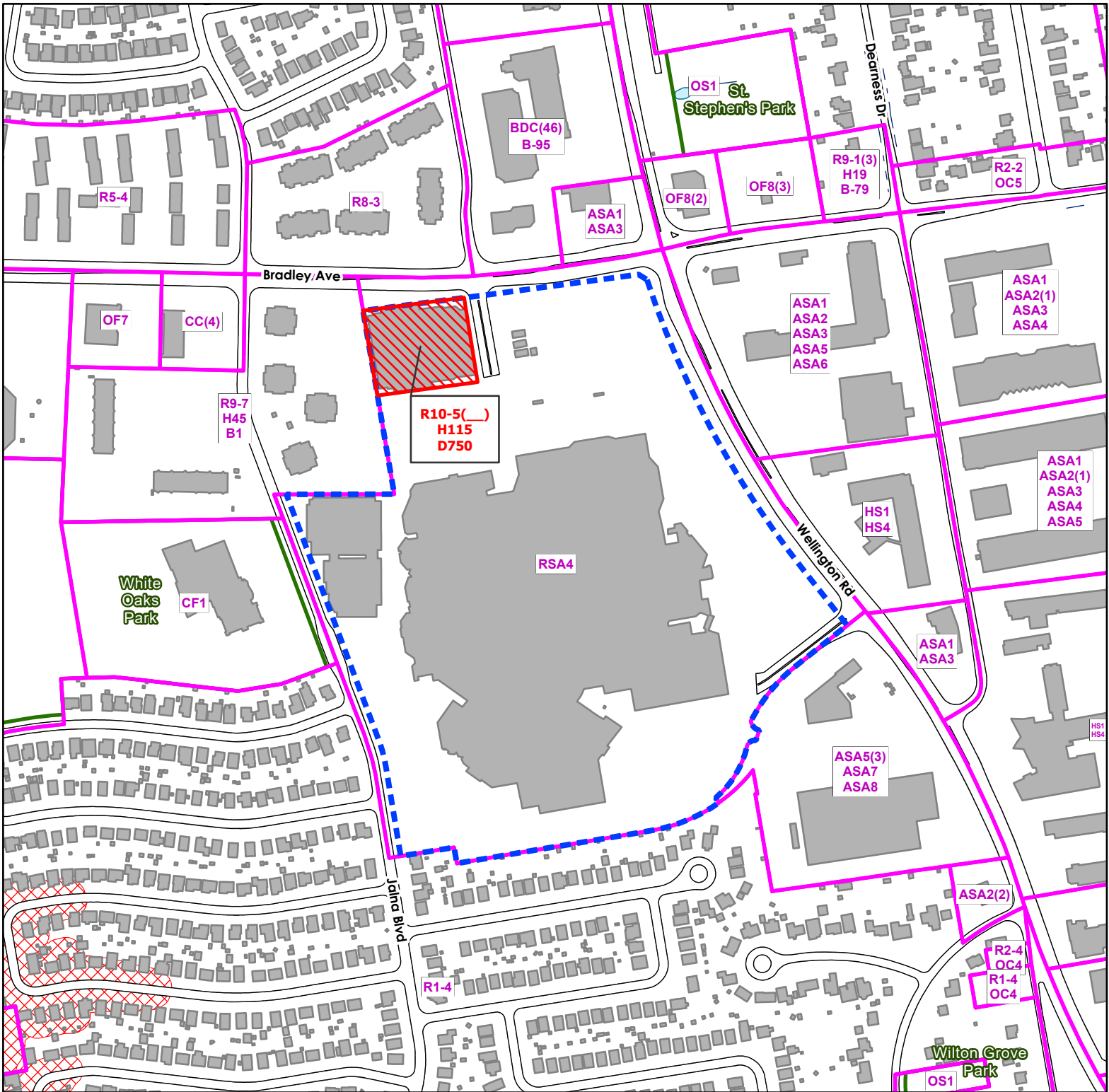






Figure 19
Proposed Zoning

Legend

-  Lands to be Rezoned
-  Subject Lands
-  Z.-1 Zones
-  Conservation Authority Regulated Areas

Date: February 7, 2024

Scale: 1:5,000

File: 13198Q

Drawn: CCF

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Document Path: C:\Users\cfandrich\Documents\ArcGIS\Projects\Project_13198Q\Project_13198Q.aprx

6.0 Conclusions

In conclusion, the requested amendments to the City's Official Plan (The London Plan) and Zoning By-law are appropriate for the Site, compatible with the existing development context and in keeping with the framework of planning policy. This assessment is based, in part, on consideration of the following merits:

- The subject lands are located within the Primary Transit Area of the City of London, form part of the City's White Oaks planning district, and are designated for a mix of urban lands uses including intensive residential uses. The property is also located within a Transit Village Protected Major Transit Station Area pursuant to The London Plan;
- The Site is well suited for the proposed high-rise forms, given its physical characteristics, its location within a prominent development node, and its proximity to the arterial road network, public transit, active transportation routes, offices, schools, parks and residential neighbourhoods. Further, introducing high-rise apartment buildings within the White Oaks Mall Site would support both the intensification and overall vitality of the Wellington Road / Bradley Avenue development node;
- The massing, orientation, and articulation of the proposed high-rise towers are designed: to be compatible with surrounding land uses; to complement the local development context; and to promote compact, efficient development. Additionally, the contemporary, high-rise tower design is intended to limit shadow impacts and to minimize obstruction of views proximate to the Site;
- The contemporary architectural design of the proposed high-rise towers would contribute positively to the local streetscape and the City's skyline. Additionally, the podium elements of the building have been designed to help enhance the pedestrian environment along the Bradley Avenue corridor;
- The addition of 568 apartment-style units broadens housing choice and housing supply within the White Oaks community;
- Technical assessments carried out for the project generally conclude that the City's servicing infrastructure and road network can accommodate the proposed development (with consideration for study recommendations);
- In our opinion, this intensification proposal: is consistent with the Provincial Policy Statement; has regard for the principles and policy objectives of The London Plan; and aligns with the design direction of the City's Placemaking Guidelines; and

- The proposed Site-specific Official Plan Amendments and Zoning By-law Amendments would appropriately implement the intended tower designs and Site layout.

Given the noted considerations and the commentary presented in this Report, it is recommended that the City of London approve the Official Plan Amendment and Zoning By-law Amendment applications, as proposed.

Respectfully submitted,

MHBC



Scott Allen, MA, RPP
Partner



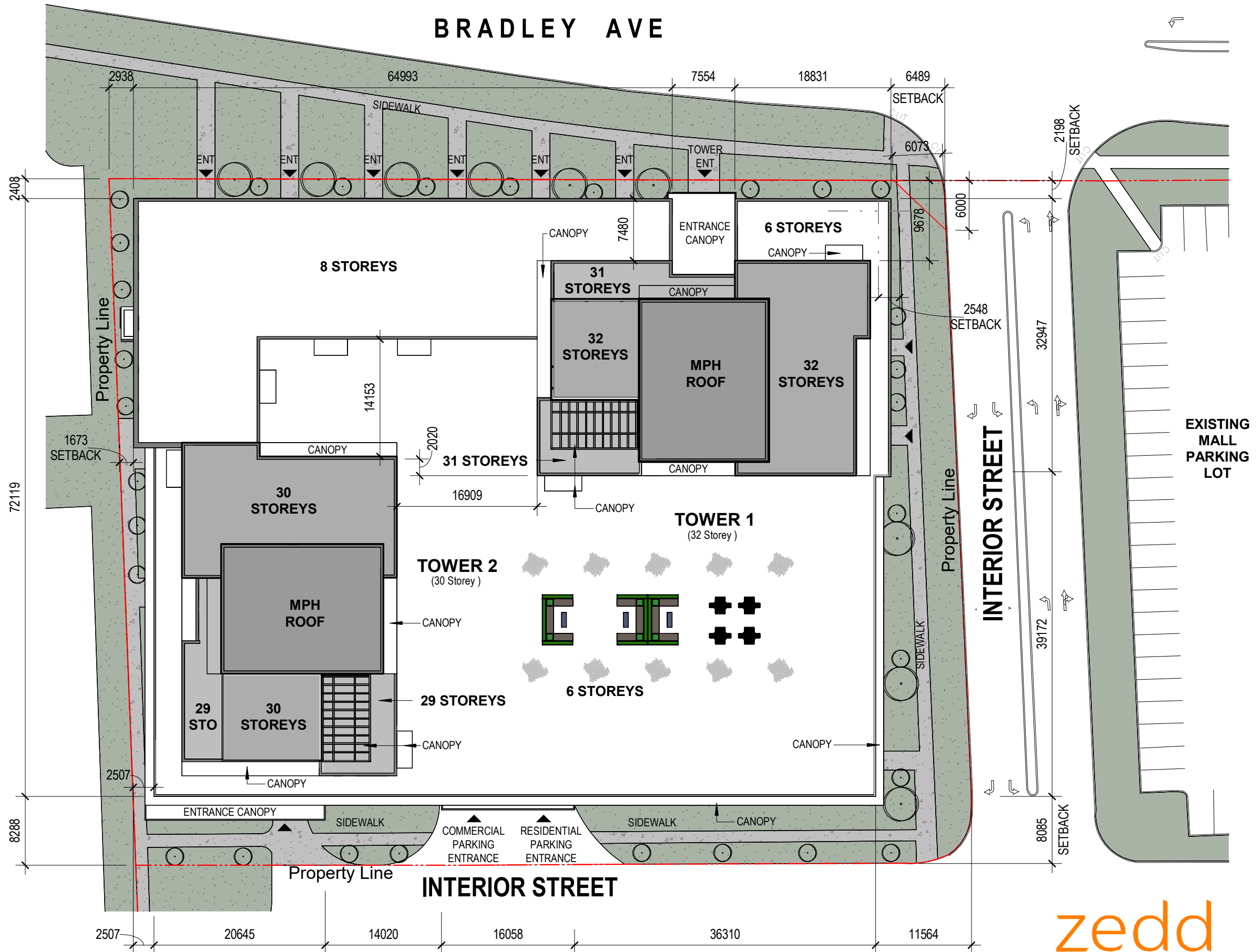
Jennifer Gaudet, BES, MCIP, RPP
Associate

Appendix A: Concept Plan; Conceptual Master Plan; Conceptual Landscape Plan

Site Development Stats

1105 Wellington Rd, London Ontario

ITEM	PERMITTED	PROVIDED
1 ZONE - PROPOSED BUILDING PERMITTED USES		
2 LOT AREA (MINIMUM)	1000 m ²	8328.262m ² (0.83 Ha)
3 LOT FRONTAGE (MINIMUM)	30 m	100.50m
4 FRONT YARD SETBACK (MINIMUM)	8m+1m per 10m of main building above 3m	2.1m
5 EXTERIOR SIDEYARD SETBAC (East) (MINIMUM)	6m+1m per 10m of main building above 3m	6.0m
6 EXTERIOR SIDEYARD SETBAC (South) (MINIMUM)	6m+1m per 10m of main building above 3m	8.0m
7 INTERIOR SIDEYARD DEPTH (West) (MINIMUM)	1.2m per 3m of main building but not less than 4.5m	1.6m
8 LANDSCAPE OPEN SPACE (% MINIMUM)	20%	29.5%
9 COVERAGE (% MAXIMUM)	50%	76%
10 HEIGHT (M MAXIMUM)		111m
11 DENSITY Units per Hectar Max. (UPH MAXIMUM)	350	685
13 COMMERCIAL PARKING		141
14 RESIDENTIAL PARKING		734
15 RESIDENTIAL BIKE PARKING		568



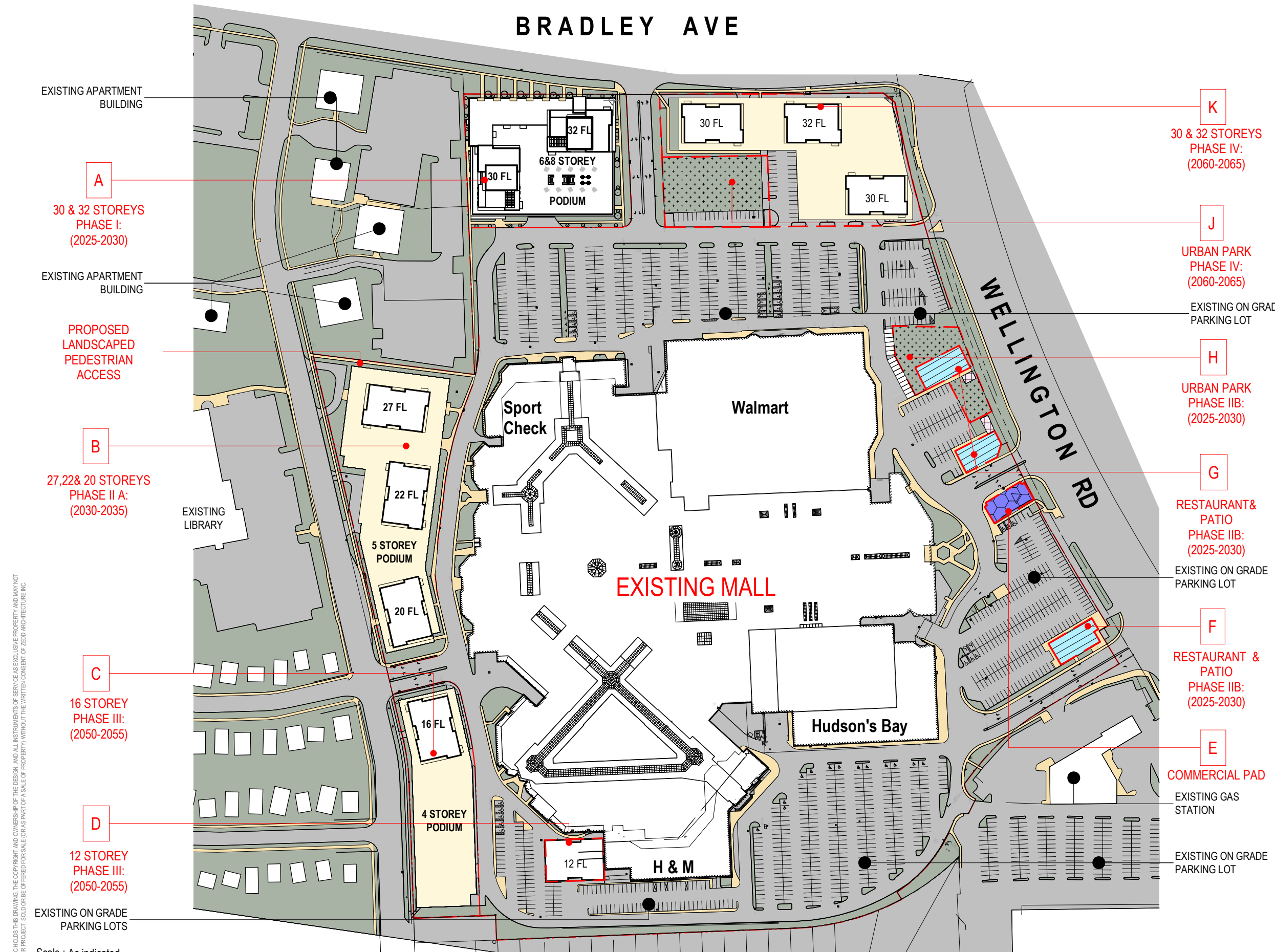
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BRADLEY AVE



Master Plan Legend				
Colour	Name	Phase	No.Of Units	Description
[Yellow]				Existing & Proposed Sidewalk
[Green]				Existing Grass
[Grey]				Asphalt
[Red outline]	A	PHASE I (2025-2030)	559	Residential Property=7,100sm 6 & 8 Storeys Podium 2 Towers: 30&32 Storeys
[Red outline]	B	PHASE II A (2030-2035)	613	Residential Property=10,320sm 5 Storeys Podium 3 Towers:27,22&20 Storeys
[Red outline]	C	PHASE III: (2050-2055)	183	Residential Property=5,610sm 5 Storeys Podium 1 Towers:16 Storeys
[Red outline]	D	PHASE III: (2050-2055)	100	Residential Property=920sm 1 Tower:12 Storeys
[Blue hexagon]	E	PHASE II B: (2025-2030)		CRU Pad = 390sm
[Red grid]	F	PHASE II B: (2025-2030)		CRU Pad = 465sm
[Red grid]	G	PHASE II B: (2025-2030)		Restaurant Pad = 865sm (465+400sm) Patio = 95sm
[Green dots]	H	PHASE II B: (2025-2030)		Urban Park = 1,475sm
[Green dots]	J	PHASE IV: (2060-2065)		Urban Park = 2,200sm
[Red outline]	K	PHASE IV: (2060-2065)	680	Residential Property=9,120sm 6 Storeys Podium 3 Towers: 30, 30&32 Storeys

EXISTING APARTMENT BUILDING

A
30 & 32 STOREYS
PHASE I:
(2025-2030)

EXISTING APARTMENT BUILDING

PROPOSED LANDSCAPED PEDESTRIAN ACCESS

B
27,22& 20 STOREYS
PHASE II A:
(2030-2035)

EXISTING LIBRARY

C
16 STOREY
PHASE III:
(2050-2055)

D
12 STOREY
PHASE III:
(2050-2055)

EXISTING ON GRADE PARKING LOTS

K
30 & 32 STOREYS
PHASE IV:
(2060-2065)

J
URBAN PARK
PHASE IV:
(2060-2065)

EXISTING ON GRADE PARKING LOT

H
URBAN PARK
PHASE IIB:
(2025-2030)

G
RESTAURANT & PATIO
PHASE IIB:
(2025-2030)

EXISTING ON GRADE PARKING LOT

F
RESTAURANT & PATIO
PHASE IIB:
(2025-2030)

E
COMMERCIAL PAD

EXISTING GAS STATION

EXISTING ON GRADE PARKING LOT

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Scale : As indicated

23-026 White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

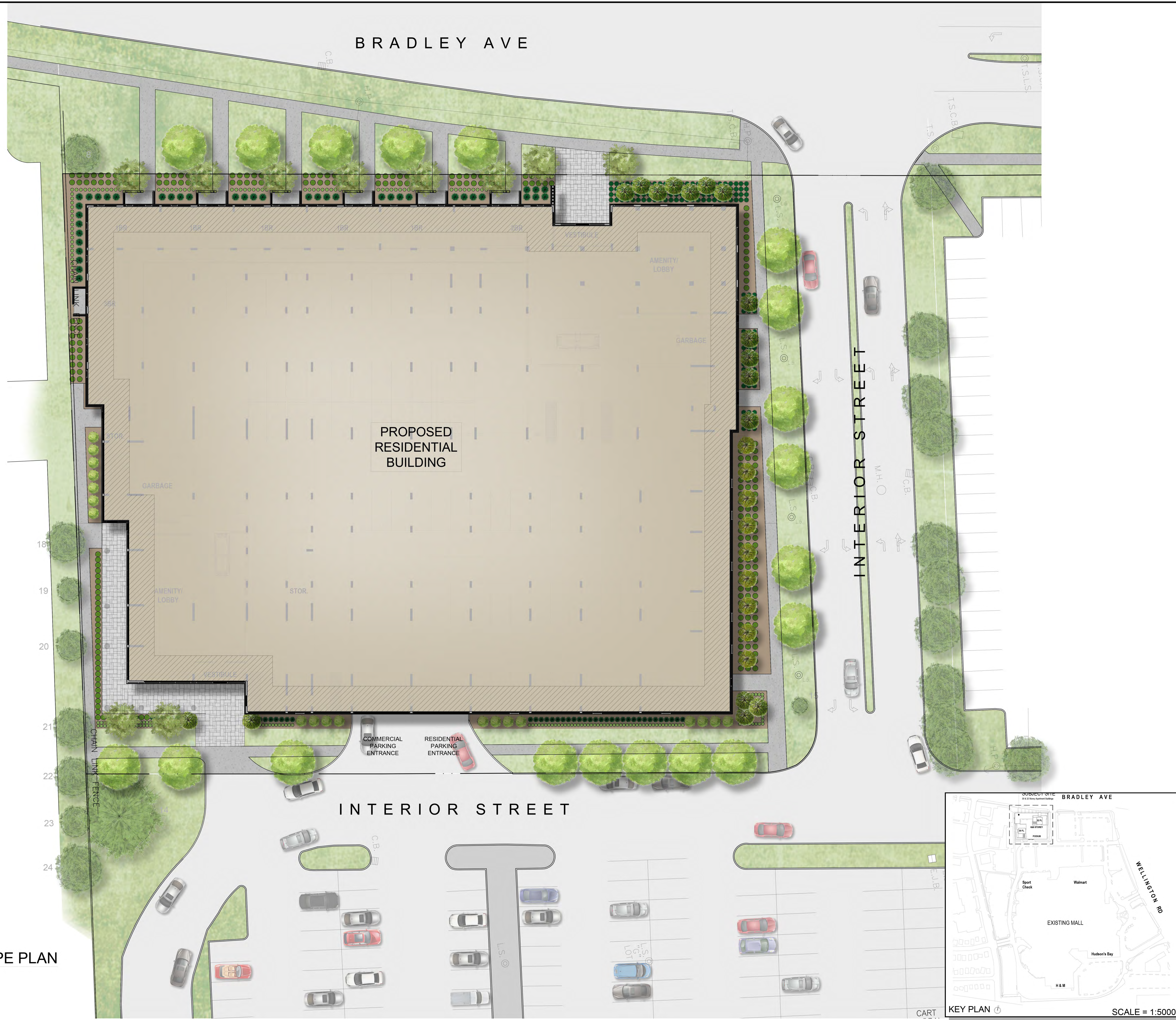
Master Plan

2024.03.06

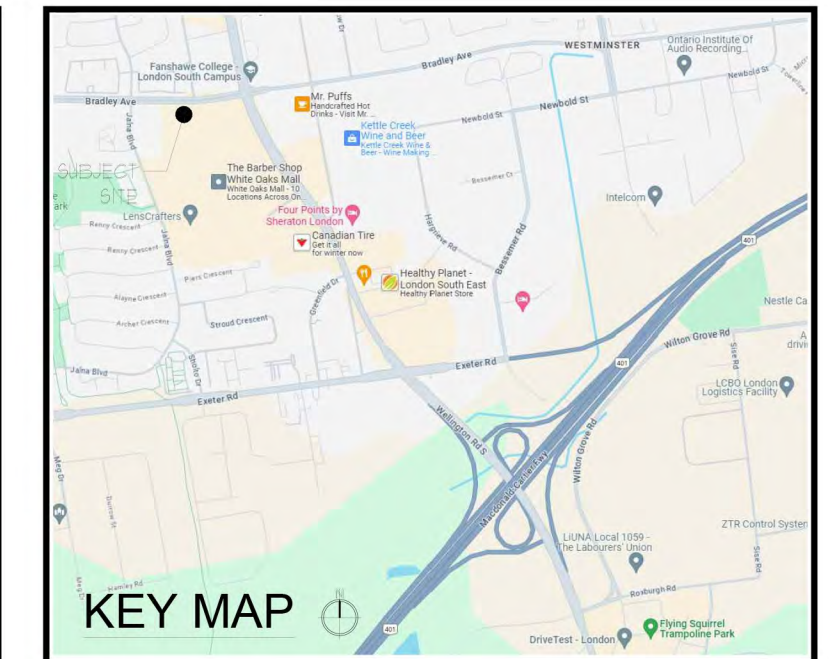
SK-1

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LANDSCAPE PLAN
SCALE = 1:250

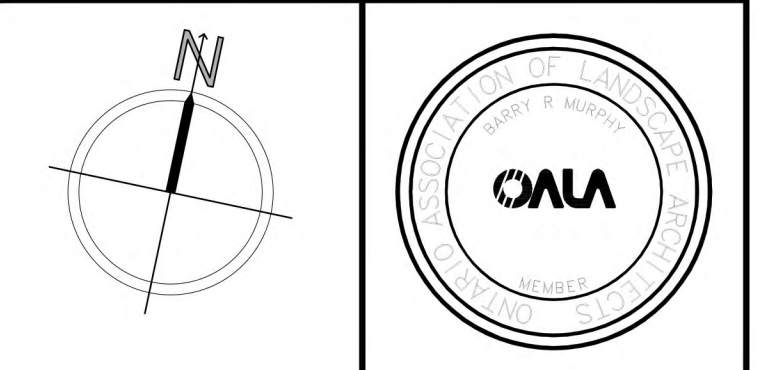


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Barry R. Murphy, O.A.L.A. C.S.L.A. DATE

DATE	DESCRIPTION	No.
FEB2024	ISSUED FOR ZBA	3
FEB2024	ISSUED FOR REVIEW	2
JAN2024	ISSUED FOR REVIEW	1

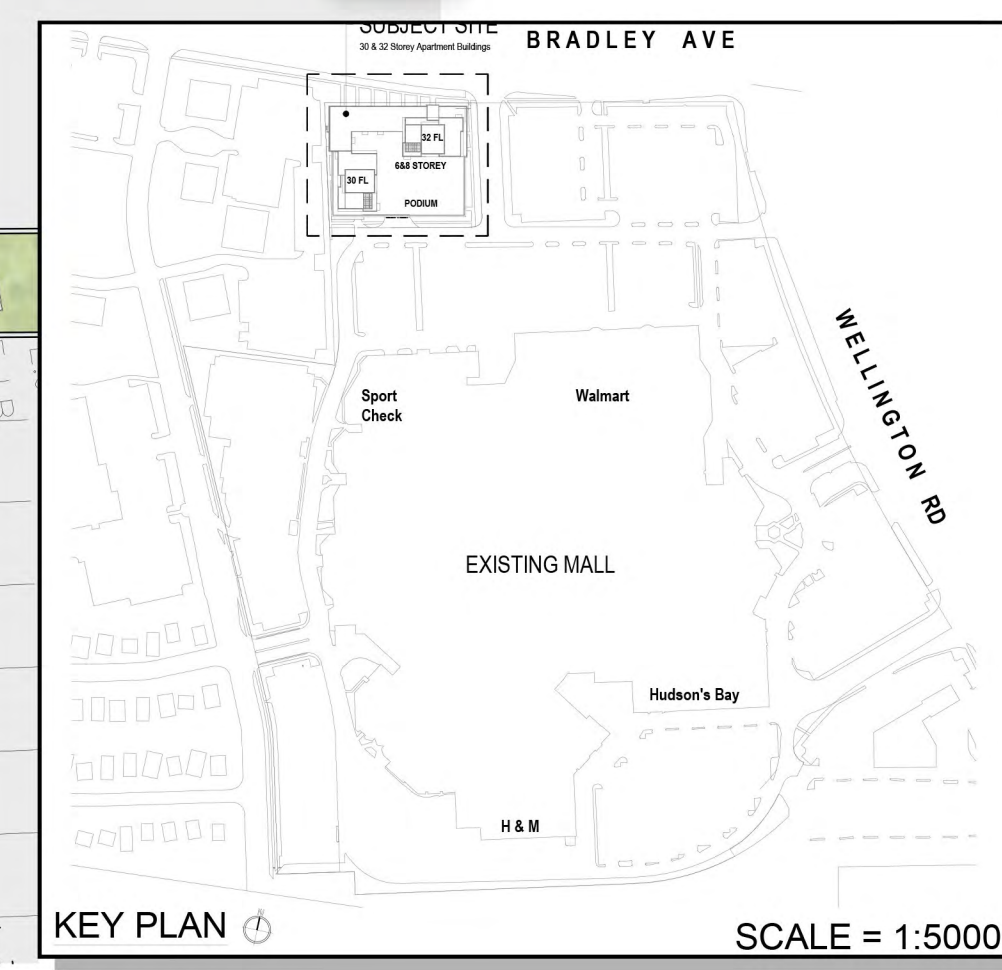
PLOTTING INFORMATION
PLOTTED DATE: FEB2024
PLOTTED SCALE: 1/1



PROJECT TITLE
WHITE OAKS APARTMENTS SITE 1
1105 WELLINGTON ROAD
LONDON, ONTARIO

DRAWING TITLE
PRESENTATION PLAN

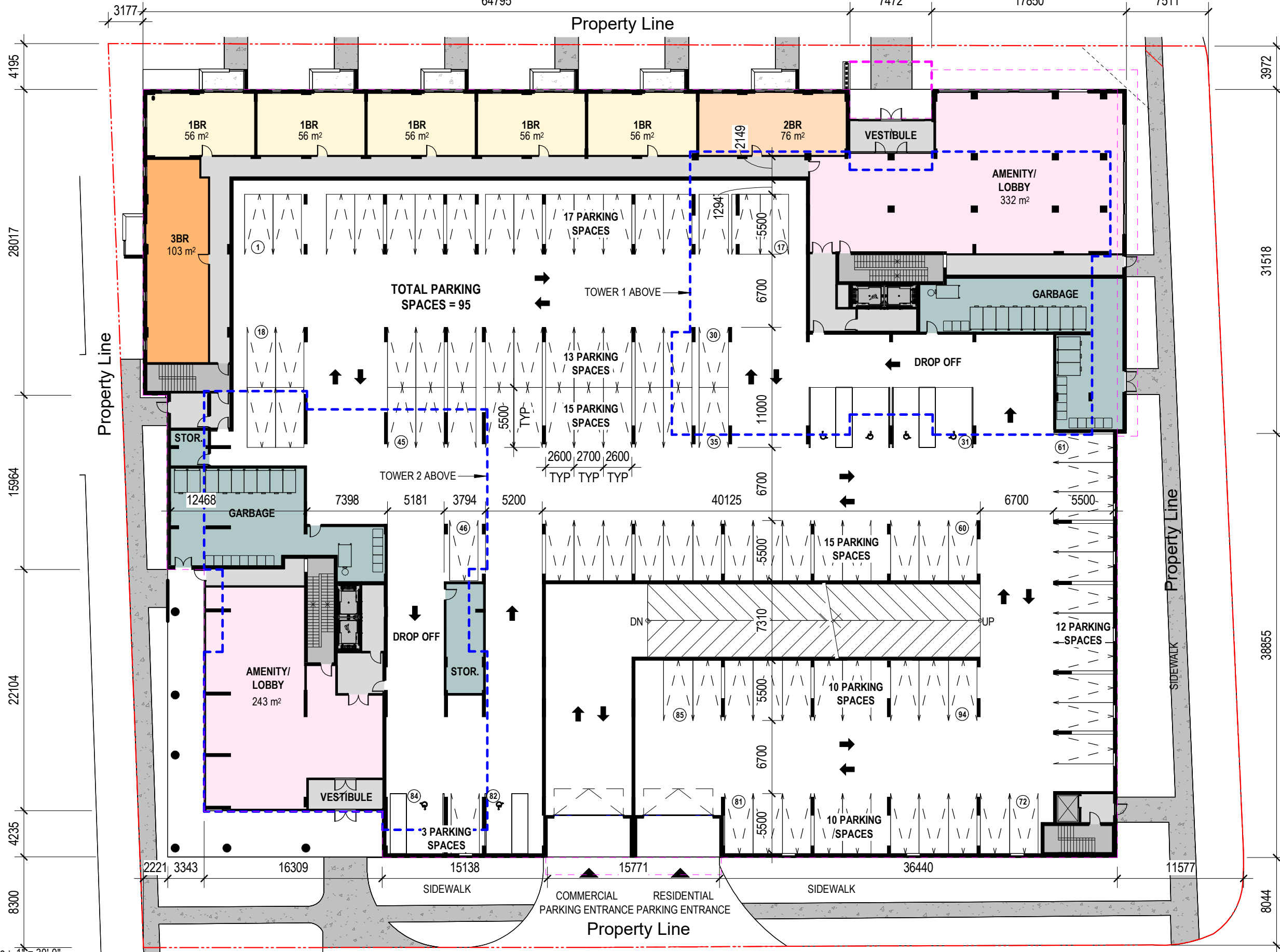
DATE: JANUARY 2024	SCALE: AS NOTED	DRAWING No: P-1
DRAWN: RKL/A Inc.	CHECKED BY: B.R.M.	
PROJECT No: 24-109S1-Lg ZBA		



KEY PLAN SCALE = 1:5000

Appendix B: Selected Floor Plans (Towers 1 and 2)

BRADLEY AVE



AREA CALCULATION

LEVEL 1
 Residential: 1614 m²
 7 Units :5(1BD)+1(2BD)+1(3BD)
 Parking: 4368 m²
 Total Area: 5982 m²
 Total Parking Spaces = 94
 +2 Tandem spaces

PRIVATE RD.



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Scale : 1" = 30'-0"

23-026 White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

L1 Level

12/31/19

SD2.2

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AREA CALCULATION
LEVEL 7
 Residential: 2965m²
 28Units: 17(1BD)+6(2BD)+4(2BD+D)+1(3BR)

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Scale : 1" = 30'-0"



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 ARCHITECTURE

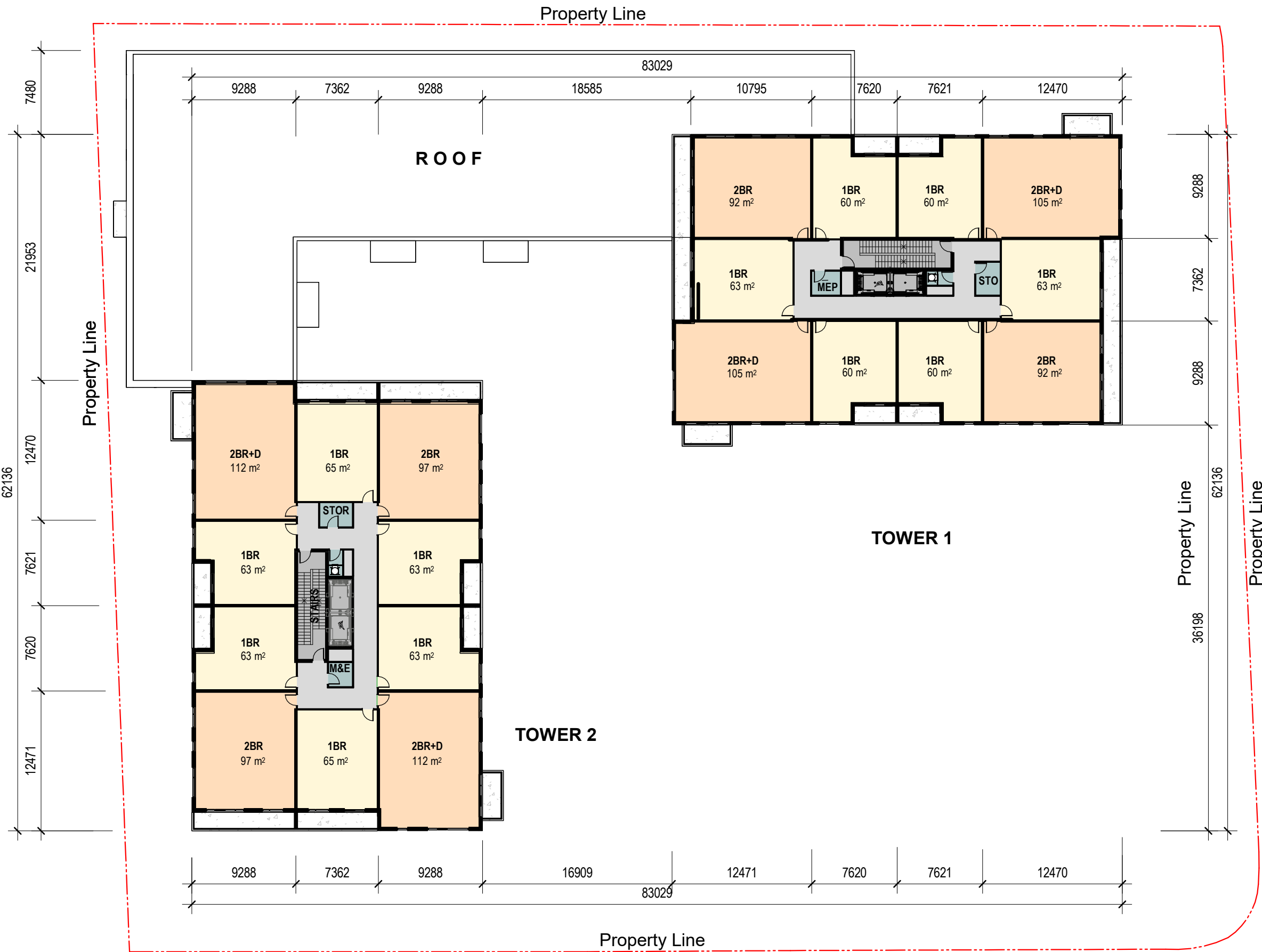
23-026 White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

Level 7

10/18/23 SD2.5

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AREA CALCULATION

BLDG 1: LEVELS 9-29
 Residential: 961m²
 6(1BD)+2(2BD)+2(2BD+D)Each FL

BLDG 2: LEVELS 9-29
 Residential: 961m²
 6(1BD)+2(2BD)+2(2BD+D)Each FL

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Scale : 1" = 30'-0"



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Property Line



AREA CALCULATION

BLDG 1: LEVEL 31
 Residential: 961m²
 10 Units: 6(1BD)+2(2BD)+2(2BD+D)

BLDG 2: LEVEL 31
 Mechanical Penthouse: 282m²



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23-026 White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

Level 31

10/18/23

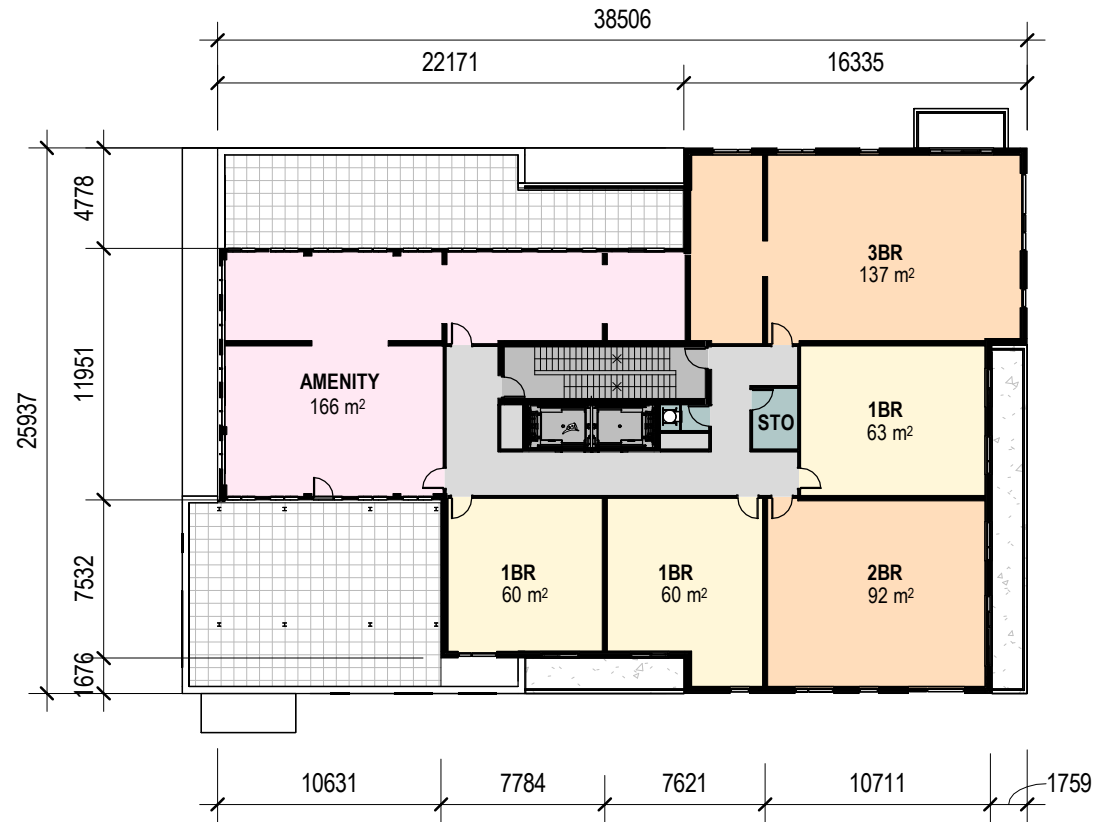
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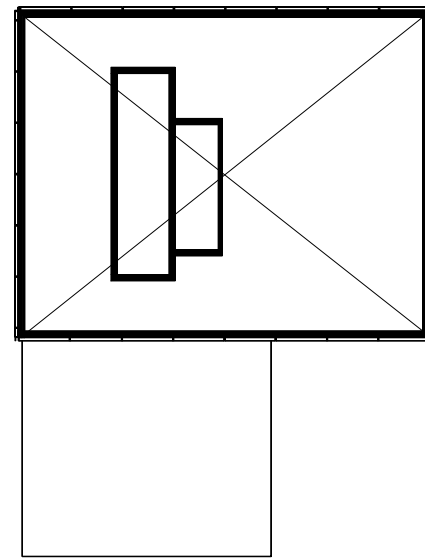
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Property Line



TOWER 1



TOWER 2

Property Line

Property Line

AREA CALCULATION

BLDG 1: LEVEL 32

Residential: 752m²

5 Units: 3(1BD)+1(2BD)+1(3BD)

Including 166m² Amenity

Scale : 1" = 30'-0"

23-026

White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

Level 32

10/18/23

SD2.10



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Appendix C: Architectural Perspectives and Renderings



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Scale :

23-026

White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

Northeast corner

2024.01.31

SD6.5

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Scale :

23-026

White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

Northwest Rendering

2024.01.31

SD6.12

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Scale :

23-026

White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

Southwest Rendering

2024.01.31

SD6.16

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Scale :

23-026

White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

Street View (Night) Rendering

2024.01.31

SD6.19

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White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

Podium View (Night) Rendering

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Scale :

23-026

White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

Northeast Rendering

2024.01.31

SD6.17

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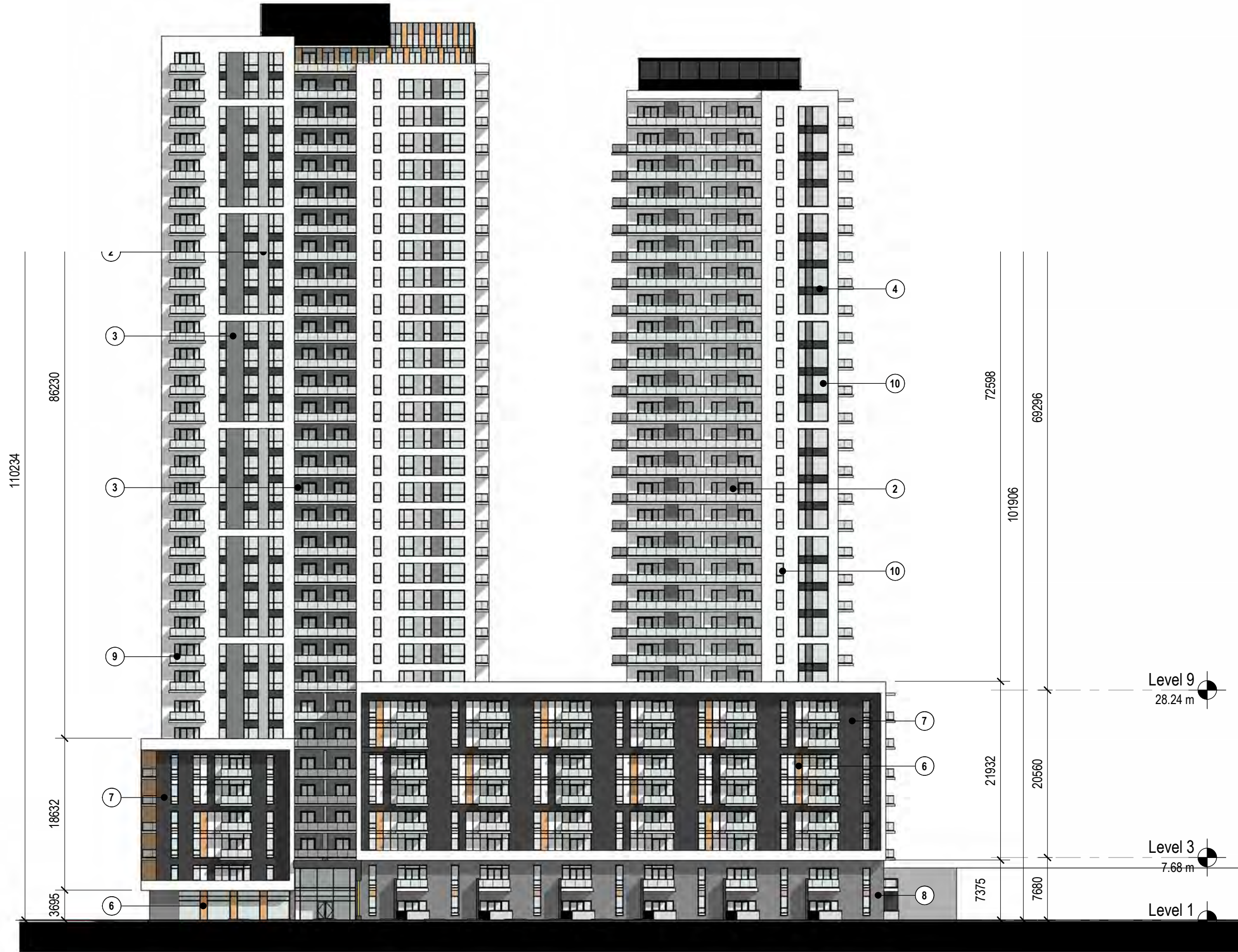
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Appendix D: Building Elevations/Section Drawings

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(2)		PAINT MANUFACTURER : TBD COLOUR : MEDIUM GREY
(3)		ARCHITECTURAL PANEL MANUFACTURER : TBD COLOUR : DARK GREY
(4)		ARCHITECTURAL PANELS MANUFACTURER : TBD COLOUR : ROCKMELON, DARK GREY, WHITE
(5)		ARCHITECTURAL PANELS MANUFACTURER : TBD COLOUR : ROCKMELON, DARK GREY, WHITE
(6)		PAINTED SPANDREL PANEL MANUFACTURER : TBD COLOUR : GREY
(7)		BRICK MANUFACTURER : TBD COLOUR : DARK GREY
(8)		MASONRY UNIT MANUFACTURER : TBD COLOUR : BLUE GREY
(9)		PREFINISHED GLASS RAILING SYSTEM MANUFACTURER : TBD COLOUR: TBD
(10)		PREFINISHED WINDOW/ DOOR CURTAIN OR WINDOW WALL MANUFACTURER : TBD COLOUR: SLATE GREY
(11)		EXTRUDED ALUMINUM PENTHOUSE MANUFACTURER : TBD COLOUR : GREY

Scale : As indicated



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	PAINT MANUFACTURER : TBD COLOUR : MEDIUM GREY
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	BRICK MANUFACTURER : TBD COLOUR : DARK GREY
	MASONRY UNIT MANUFACTURER : TBD COLOUR : BLUE GREY
	PREFINISHED GLASS RAILING SYSTEM MANUFACTURER : TBD COLOUR: TBD
	PREFINISHED WINDOW/ DOOR CURTAIN OR WINDOW WALL MANUFACTURER : TBD COLOUR: SLATE GREY
	EXTRUDED ALUMINUM PENTHOUSE MANUFACTURER : TBD COLOUR : GREY

Level 7
21.26 m

Level 1

Scale : As indicated

23-026 White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

South Elevation

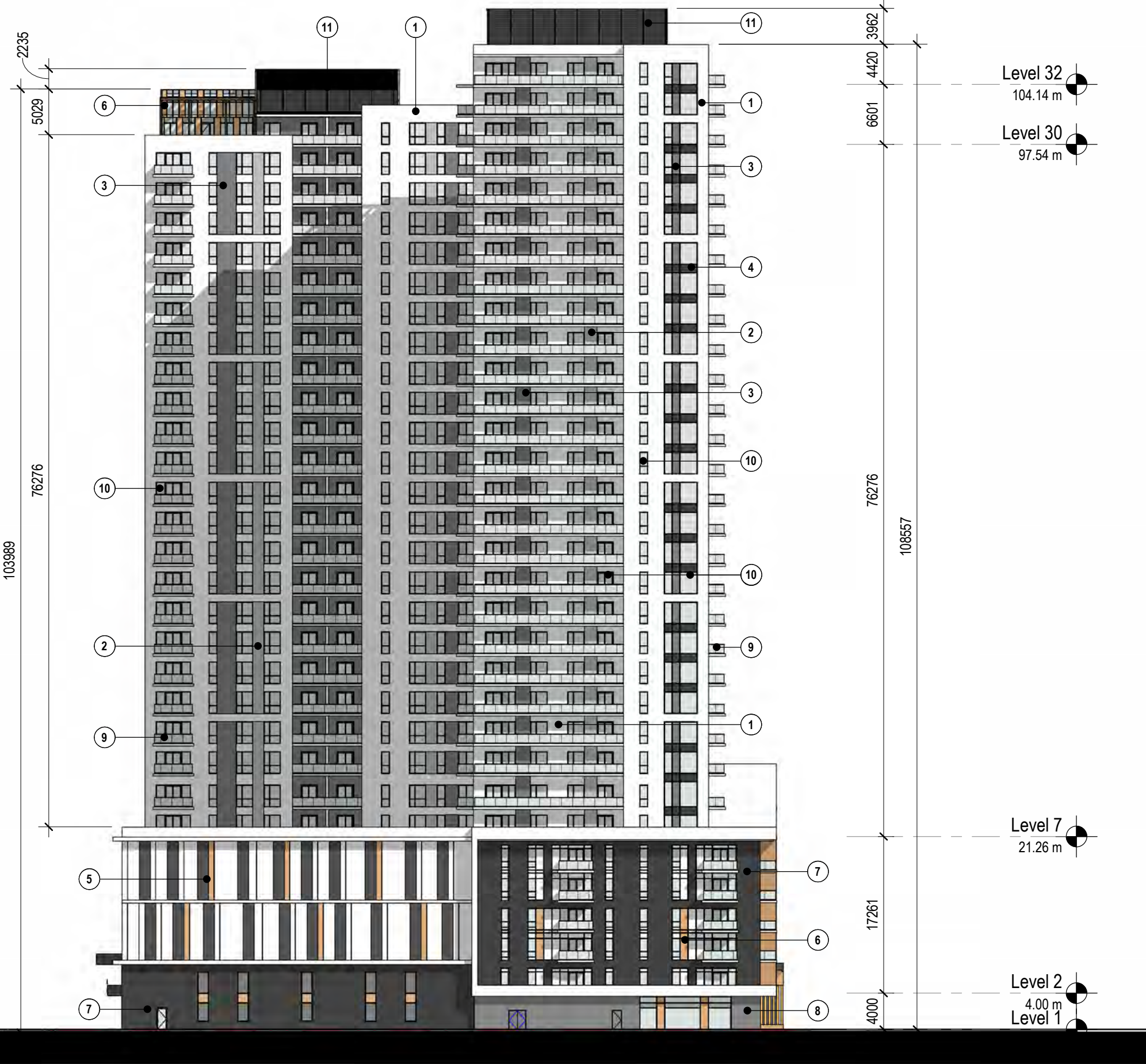
12/31/19

SD4.2

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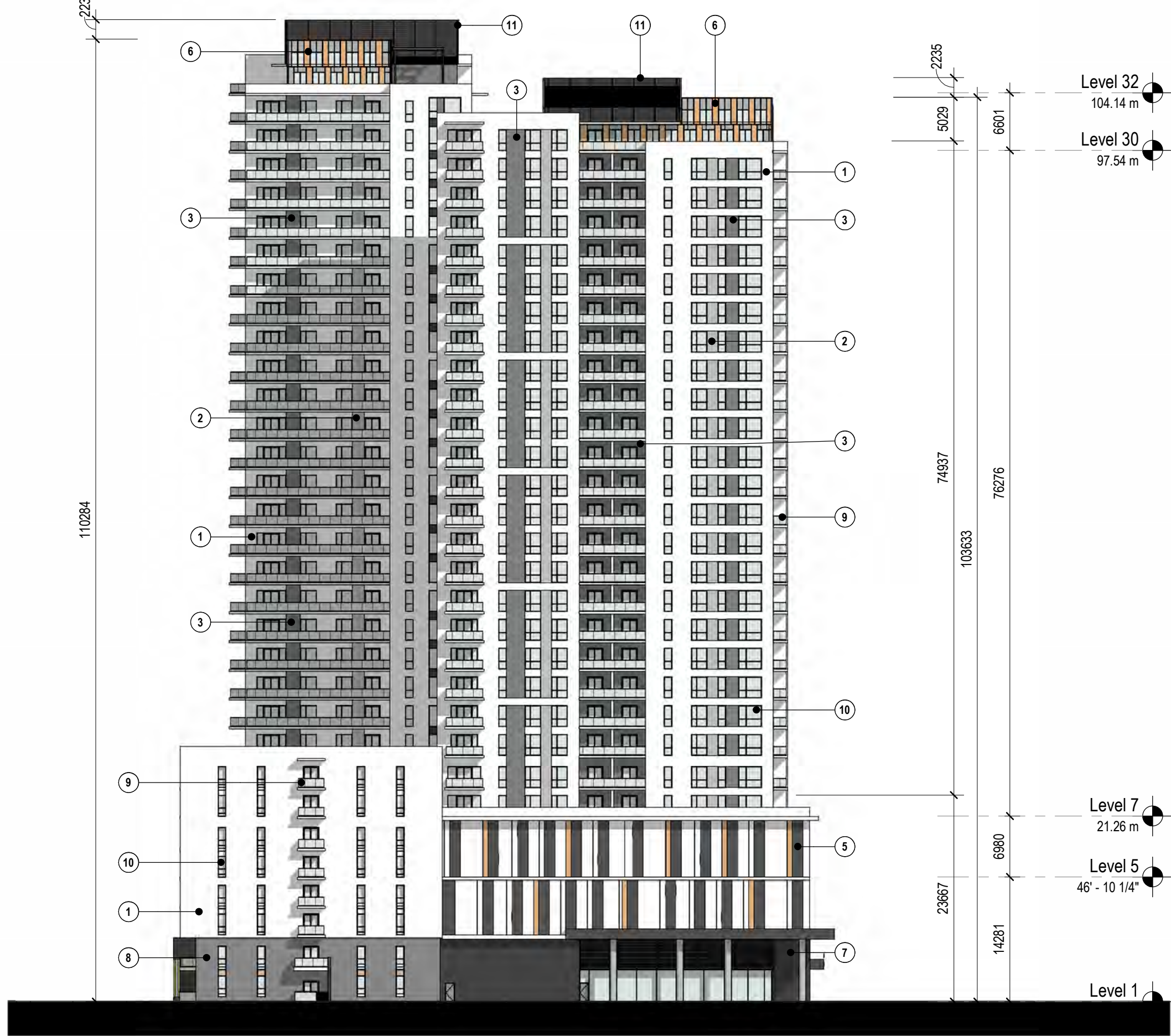
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Exterior Finish Legend	
Symbol	Panel Type
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	PAINT MANUFACTURER : TBD COLOUR : LIGHT GREY
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	ARCHITECTURAL PANELS MANUFACTURER : TBD COLOUR : ROCKMELON, DARK GREY, WHITE
	PAINTED SPANDREL PANEL MANUFACTURER : TBD COLOUR : GREY
	BRICK MANUFACTURER : TBD COLOUR : DARK GREY
	MASONRY UNIT MANUFACTURER : TBD COLOUR : BLUE GREY
	PREFINISHED GLASS RAILING SYSTEM MANUFACTURER : TBD COLOUR: TBD
	PREFINISHED WINDOW/ DOOR CURTAIN OR WINDOW WALL MANUFACTURER : TBD COLOUR: SLATE GREY
	EXTRUDED ALUMINUM PENTHOUSE MANUFACTURER : TBD COLOUR : GREY

Scale : As indicated

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Exterior Finish Legend	
Symbol	Panel Type
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	PAIN MANUFACTURER : TBD COLOUR : LIGHT GREY
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	PAINTED SPANDEL PANEL MANUFACTURER : TBD COLOUR : GREY
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	MASONRY UNIT MANUFACTURER : TBD COLOUR : BLUE GREY
	PREFINISHED GLASS RAILING SYSTEM MANUFACTURER : TBD COLOUR : TBD
	PREFINISHED WINDOW/ DOOR CURTAIN OR WINDOW WALL MANUFACTURER : TBD COLOUR : SLATE GREY
	EXTRUDED ALUMINUM PENTHOUSE MANUFACTURER : TBD COLOUR : GREY

Scale : As indicated

23-026

White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

West Elevation

11/24/23

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Scale : 1" = 60'-0"

23-026

White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

North-South Section

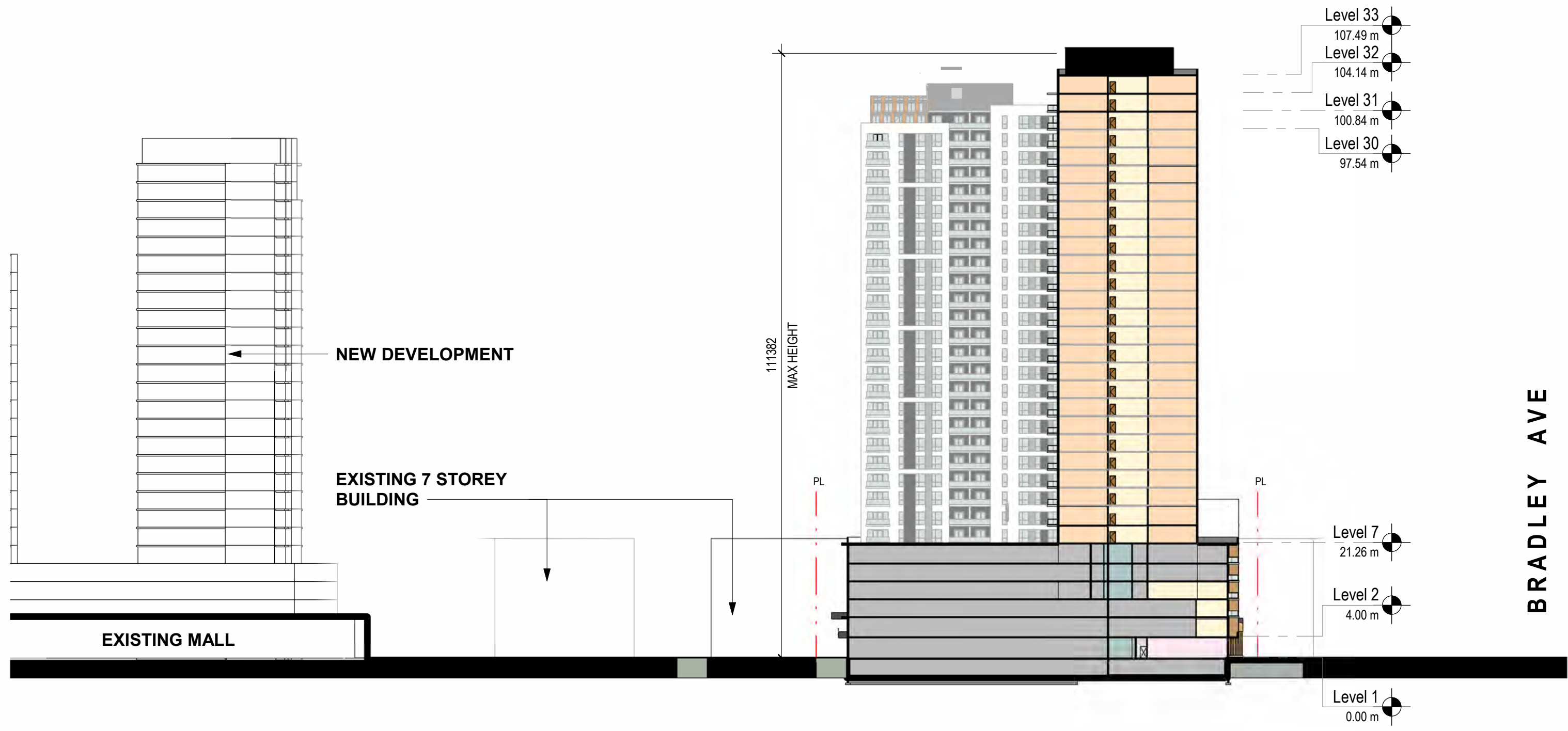
12/31/19

SD5.1

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NEW DEVELOPMENT

EXISTING 7 STOREY BUILDING

EXISTING MALL

111.382
MAX HEIGHT

Level 33

107.49 m

Level 32

104.14 m

Level 31

100.84 m

Level 30

97.54 m

Level 7

21.26 m

Level 2

4.00 m

Level 1

0.00 m

BRADLEY AVE

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Scale : 1" = 60'-0"

23-026

White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

East - West Section

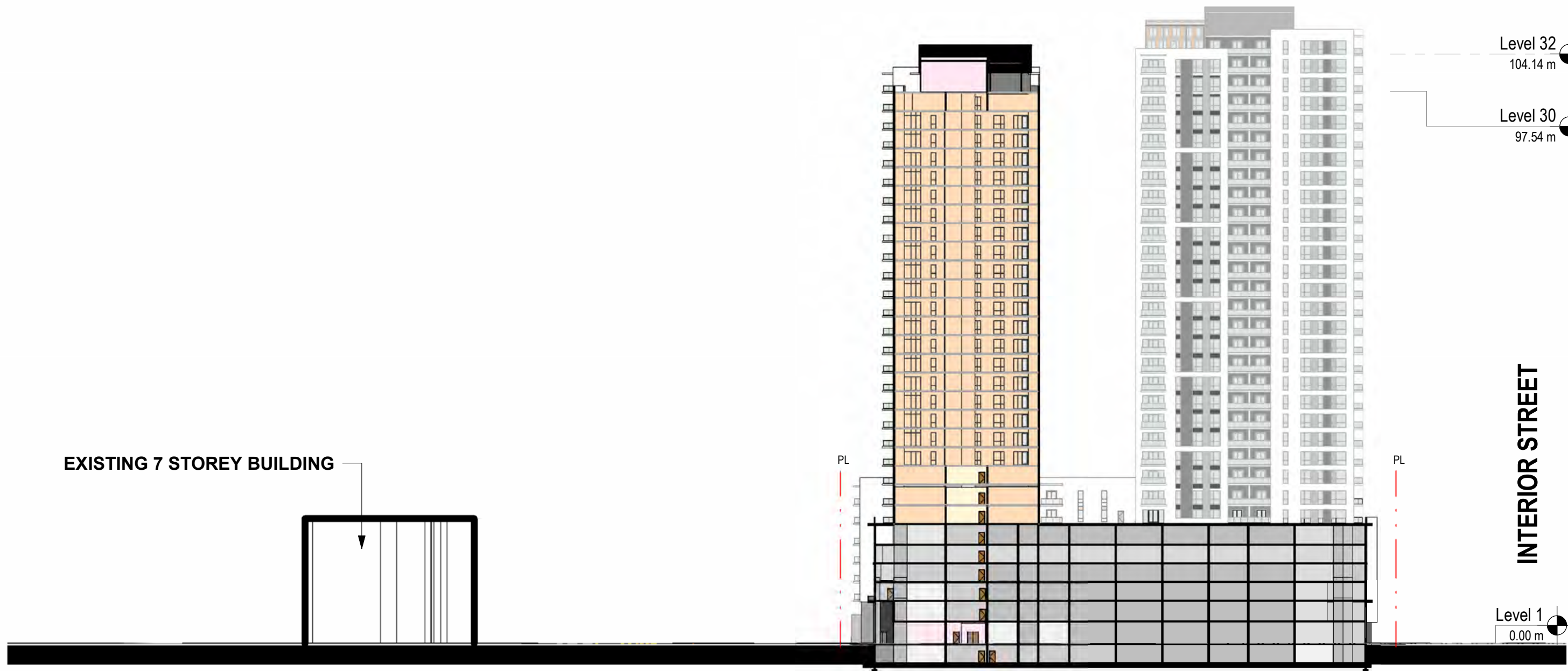
12/31/19

SD5.2

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Appendix E: Shadow Study

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MARCH 21 9:00AM



MARCH 21 12:00PM



MARCH 21 3:00PM

Scale :

23-026

White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

Shadow Study - March

11/25/23

SD7.1

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JUNE 21 9:00AM



JUNE 21 12:00PM



JUNE 21 3:00PM

Scale :

23-026

White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

Shadow Study - June

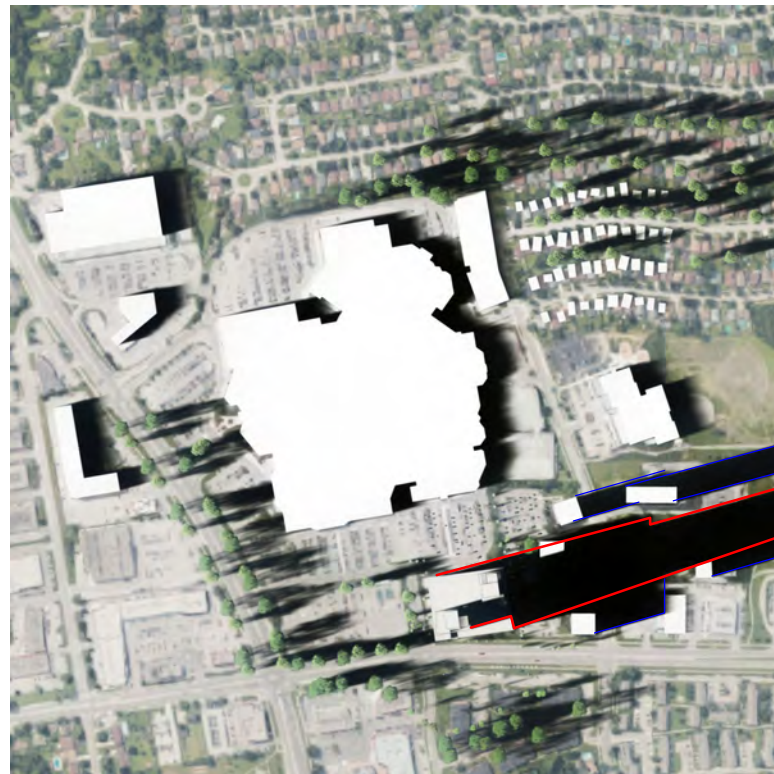
11/25/23

SD7.2

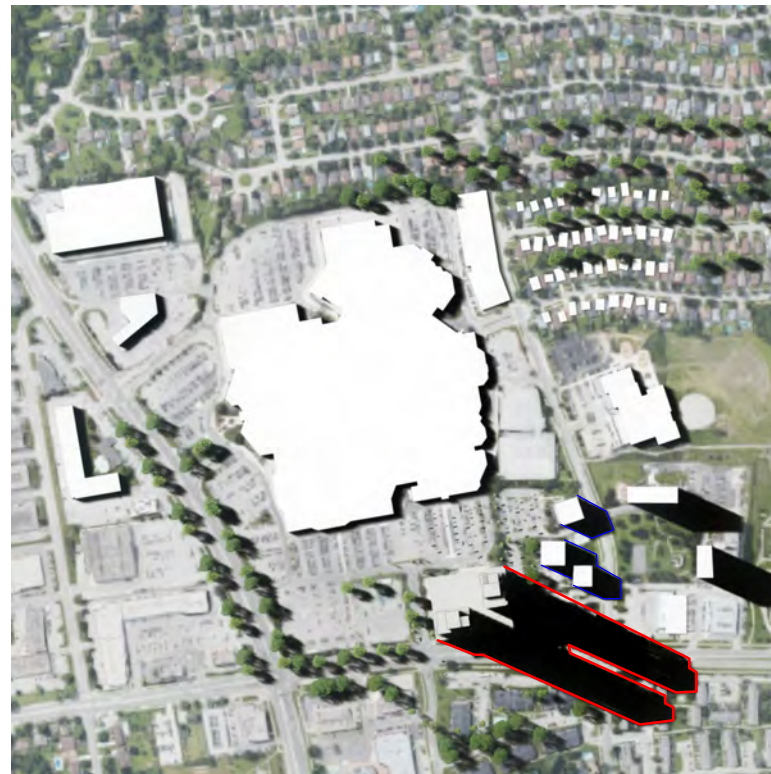
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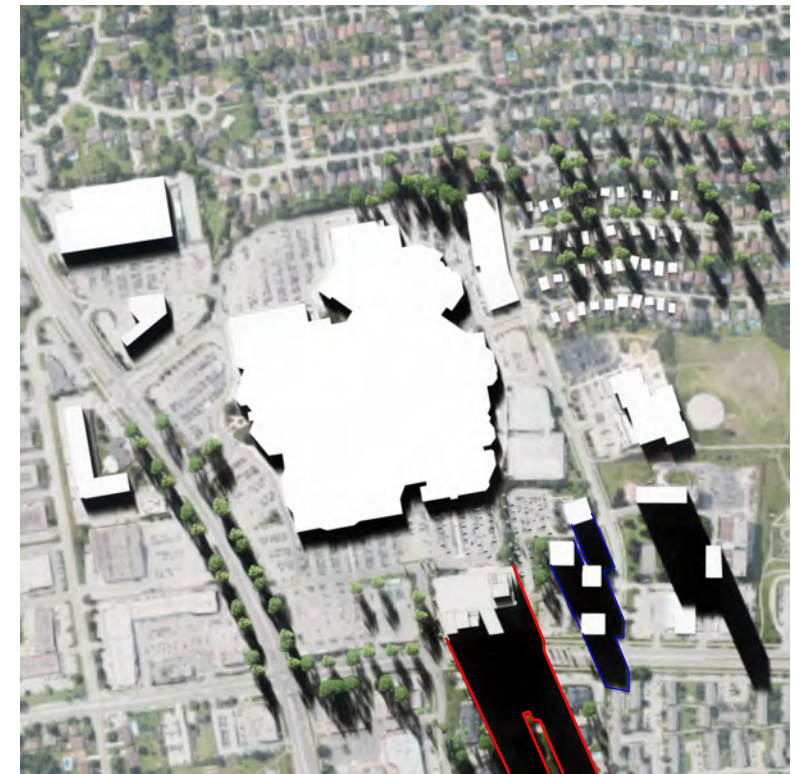
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DECEMBER 21 9:00AM



DECEMBER 21 12:00PM



DECEMBER 21 3:00PM

Scale :

23-026

White Oaks Apartments-Site 1

1105 Wellington Rd, London Ontario

Shadow Study - December

11/25/23

SD7.3

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Appendix F: Zoning Data Sheet

ZONING DATA SHEET – ZONING BY-LAW AMENDMENT

To be completed by Applicant as part of Complete Application

File No.

Description of Land	
Municipal street address: 1105 Wellington Road , London (White Oaks Mall)	
Legal Description:	
Street Frontage / Street Flankage (name): Bradley Avenue (for Site)	
Existing Zone(s) in Z.-1 Zoning By-law: RSA4	Proposed Zone(s) in Zoning By-law:RSA4/R10-5()*D750*H115

BY-LAW RESTRICTIONS	REQUIRED (PROPOSED ZONE)	AS SHOWN ON PLAN
(a) Use	Apartment Building	Apartment Building
(b) Lot Area (m ²) Min	1,000	8,328
(c) Lot Frontage (m) Min	30	100.5
(d) Front Yard Depth (m) Main Building/ Garage (m) Min	8 m + 1 m/10 m of height above first 3 m = 18.8	2.1
(e) Rear Yard Depth (m) Min	1.2 m / 3 m of height = 44.4 m	8.2
(f) Interior Yard Depth (m) Min	1.2 m / 3 m of height = 44.4 m	1.6 (west)
(g) Interior Yard Depth (m) Min		2.5 (east)
(h) Exterior Yard Depth (m) Min	8 m + 1 m/10 m of height above first 3 m = 18.8 m	N/A
(i) Lot Coverage (%) Max	50%	76%
(j) Landscaped Open Space (% Min)	20%	29.5%
(k) Height (m) Max	Site-specific	115 m
(l) Off-street Parking Min (rate/number)	Exempt	734 (residential); 141 Commercial
(m) Bicycle Parking Min (rate/number)	1 / unit = 568	568
(n) Parking Area Coverage (%) Max		
(o) Parking Set Back Min		
(p) Gross Floor Area (m ²) Max		
(q) Gross Floor Area For Specific Uses (m ²) Max		
(r) Yard Encroachments (if applicable)		
(s) Density Max (rate/number) (see Section 3.4 1) for mixed-use)	350 units/ha	750 units/ha
(t) Special Provisions		
(u) Other By-law Regulations		

COMMENTS**NOTE:**

- Please be sure to carefully review and include data / details related to:
 - General Provisions (Section 4) of the Zoning By-law
 - Zones and Zone Symbols (Section 3) of the Zoning By-law
 - Regulations Section and Table for Proposed Zone
 - Zoning By-law Definitions
- The Applicant is responsible for submitting complete & accurate information on the Zoning Data Sheet and associated plans.
- Failure to provide complete & accurate information on the Zoning Data Sheet and associated plans will result in processing delays, and may require the submission of a revised Zoning By-law amendment application.

