



March 14, 2024

Planning Services
The Corporation of the City of London
300 Dufferin Avenue, 6th Floor
London, Ontario
N6A 4L9

Attention: Mike Corby, Manager, Development Services

**Re: Planning Justification Letter - Zoning By-Law Amendment
Olde School Professional Properties Inc
743 Wellington Road
London, ON**

Our File: FPG/LON/24-01

Zelinka Priamo Ltd., on behalf of Olde School Professional Properties Inc, is pleased to submit a Zoning By-law Amendment application for the above-noted lands (the 'subject lands'), known municipally as 743 Wellington Road (hereinafter referred to as the "subject lands"). The intent of this Zoning By-law Amendment application is to add additional uses, being "*Emergency Care Establishments*" and "*Clinics*", to the subject lands' list of permitted uses.

The subject lands are intended to become a potential "*Hub*" location as a part of the "*London's Health & Homelessness Response: Proposed Hubs Implementation Plan*". This plan intends to help the most marginalized Londoners move safely inside, become stabilized, supported, and connected to the right housing resources to help them stay housed. Permitting "*Emergency Care Establishments*" and "*Clinics*" through the proposed Zoning By-law Amendment will allow for the existing building to become equipped with the necessary facilities to appropriately serve London's community members currently experiencing homelessness. A pre-application consultation meeting took place with City of London Staff on February 6, 2024 in which the intention for the subject lands was expressed.

The purpose of this Planning Justification Report is to evaluate the proposed Zoning By-law Amendment application within the context of existing land use policies and regulations, including the Provincial Policy Statement, the City of London Official Plan (The London Plan), and the City of London Zoning By-law.

This report concludes that the proposed Zoning By-law Amendment application to permit the additional requested uses is appropriate and desirable for the following reasons:

- The proposed Zoning By-law Amendment is consistent with the policies of the 2020 Provincial Policy Statement and The London Plan;
- The proposed Zoning By-law Amendment will permit needed and necessary uses in an established built-up area of the city, well-suited to support “*Emergency Care Establishments*” and “*Clinics*”; and,
- The proposed Zoning By-law Amendment will allow for appropriate and desirable uses, which are compatible with, and complimentary to the surrounding area, to occupy and efficiently utilize the existing vacant building and features of the subject lands.

SUBJECT LANDS

The subject lands are located on the west side of Wellington Road, approximately 360m from the Wellington Road and Southdale Road East intersection (Figure 1).

Figure 1 – Subject Lands (Outlined in red)



The generally rectangular-shaped parcel of land has an approximate frontage of 71.5 m (234.5 ft) along Wellington Road, a depth of approximately 64.8 m (212.5 ft) and an approximate area of 4,624.7 m² (0.46 ha).

The subject lands are currently occupied by a vacant office building, with associated landscaping and surface parking areas. Vehicular access to the subject lands is provided directly from Wellington Road to an associated parking lot on the westernmost section of the parcel; and, directly from Wellington Road to another small associated parking lot on the northernmost portion of the parcel. Currently, there are a total of 46 vehicular parking spaces

on the site. Full turns access is available to the subject lands from Wellington Road. The subject lands' relationship to Wellington Road is illustrated in Figure 2.

Figure 2 – View of the subject Lands from Wellington Road



The subject lands are within the “*Rapid Transit Corridor*” Place Type along a “*Rapid Transit Boulevard* (Wellington Road) in The London Plan; and, are zoned “*Restricted Office -RO1*” in the City of London Z.1 Zoning By-Law, as amended.

SURROUNDING LAND USES

The subject lands are in an area characterized by a range of Place Types including “*Neighbourhoods*”, “*Green Space*”, “*Institutional*”, and “*Rapid Transit Corridor*”, according to Map 1 – of The London Plan. Land uses within the surrounding Place Types generally consist of commercial/retail, office, residential, service, and recreational/open space uses.

The lands abutting the subject lands to the north primarily consist of commercial/retail uses as shown in Figure 3.

Figure 3 – Abutting commercial lands to the north (looking northwest, subject lands at left)



Land uses abutting the subject lands to the west and south consist of residential uses in the form of single detached dwellings as shown in Figures 4 and 5.

Figure 4 – Abutting residential to the south (looking southwest, subject lands at right)



Figure 5 – Abutting residential to the west (looking east)

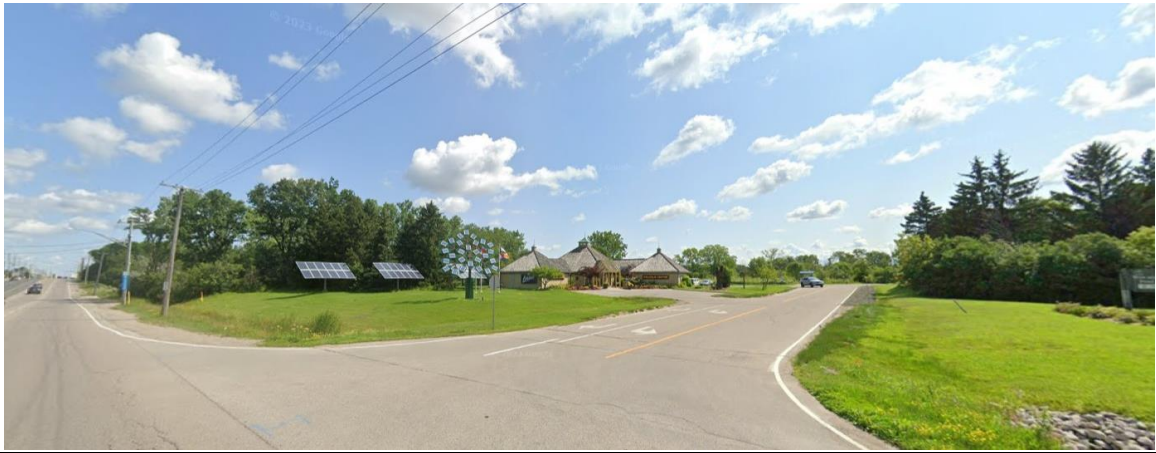


Lands located directly across Wellington Road consist of a London Fire Station and the Westminster Ponds Conservation Area's Welcome Centre, as shown in Figures 6 and 7.

Figure 6 – London Fire Station, across Wellington Road from the subject lands (looking southeast)



Figure 7– Westminster Ponds Conservation Area Welcome Centre, across Wellington Road from the subject lands (looking northeast)



Notably, the London Health Sciences Centre (LHSC) and Parkwood Institutes' mental health care building are located approximately 650m north of the subject lands (Figure 8-9).

Figure 8– London Health Sciences Centre, north of the subject lands on Wellington Road

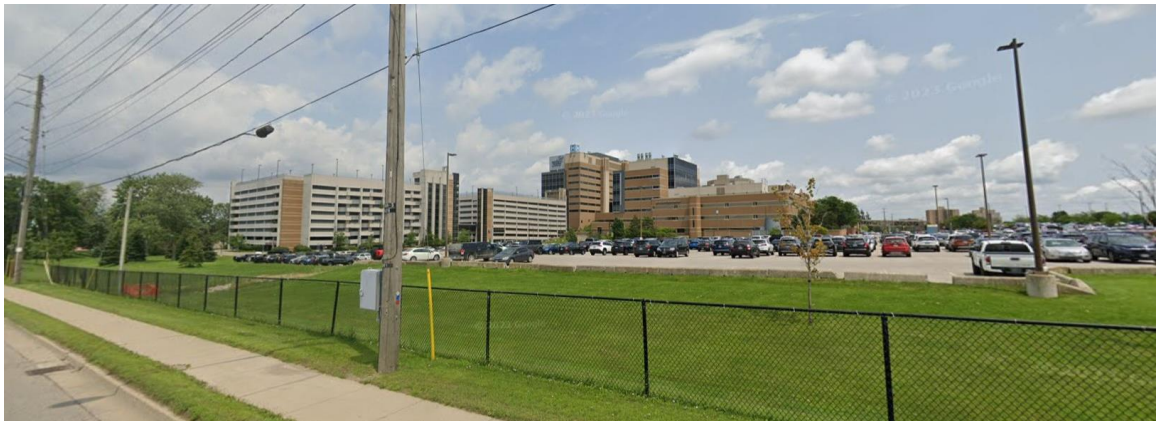


Figure 9– Parkwood Institute, north of the subject lands on Wellington Road



PROPOSED REDEVELOPMENT

No substantial physical changes to the exterior of the building or site layout are proposed. Rather, the subject lands are proposed to be re-zoned to permit additional uses, being “Emergency Care Establishments” and “Clinics”, which may require internal modifications to support the intended uses.

PROPOSED ZONING BY-LAW AMENDMENT

To include “Emergency Care Establishments” and “Clinics” as permitted uses on the subject lands, a Zoning By-law Amendment is required. The proposed Zoning By-law Amendment seeks to rezone the subject lands to a site-specific “Restricted Office (RO1 (_))” Zone to add “Emergency Care Establishments” and “Clinics” as permitted uses on the subject lands.

PLANNING ANALYSIS

Provincial Policy Statement (PPS):

The proposed Zoning By-law Amendment is consistent with the 2020 Provincial Policy Statement, including the following policies:

Provincial Policy Statement (2020) Policy Analysis Table	
<i>Policy</i>	<i>Response</i>
<p>Section 1.1.1 Healthy, live able 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 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; c) avoiding development and land use patterns which may cause environmental or public health and safety concerns; 	<p>The proposed Zoning By-Law Amendment will add appropriate institutional uses to help meet the immediate and long-term needs of the community’s most vulnerable populations, thereby providing much needed support to a wide range of demographics and populations with appropriate emergency care and/or health care services.</p>
<p>Section 1.3.1 Employment Planning authorities shall promote economic development and competitiveness by:</p> <ul style="list-style-type: none"> a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs; 	<p>The proposed use will add appropriate and vital community resources to help meet the long-term needs of the White Oaks community and City of London as a whole.</p>

<p>Section 1.6.4 Infrastructure and public service facilities should be strategically located to support the effective and efficient delivery of emergency management services, and to ensure the protection of public health and safety in accordance with the policies in Section 3.0: Protecting Public Health and Safety.</p>	<p>The subject lands, being located along a planned bus rapid transit corridor in the City of London, are at an appropriate location for the proposed uses given the presence of other major health care establishments, such as the London Health Sciences Centre and Parkwood Hospital located approximately 650m to the north of the subject lands on Wellington Road.</p>
<p>Section 1.6.5 Public service facilities should be co-located in community hubs, where appropriate, to promote cost-effectiveness and facilitate service integration, access to transit and active transportation.</p>	<p>A broader range of uses on a site will effectively utilize existing land and resources that will subsequently support the use of existing public transportation infrastructure, public service facilities and active transportation routes.</p>
<p>Section 1.6.6.2 Planning for sewage and water services shall:</p> <p>Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services.</p>	<p>The subject lands will continue to utilize existing municipal sewage services and municipal water services. There are no risks to human health and safety.</p>
<p>Section 1.7.1 Long-term economic prosperity should be supported by:</p> <ul style="list-style-type: none"> a) promoting opportunities for economic development and community investment-readiness; 	<p>The request for additional permitted uses on the subject lands will help to ensure this location can be activated and remain economically viable with a variety of appropriate and desirable uses to help support opportunities for economic development and readiness for community investment.</p>

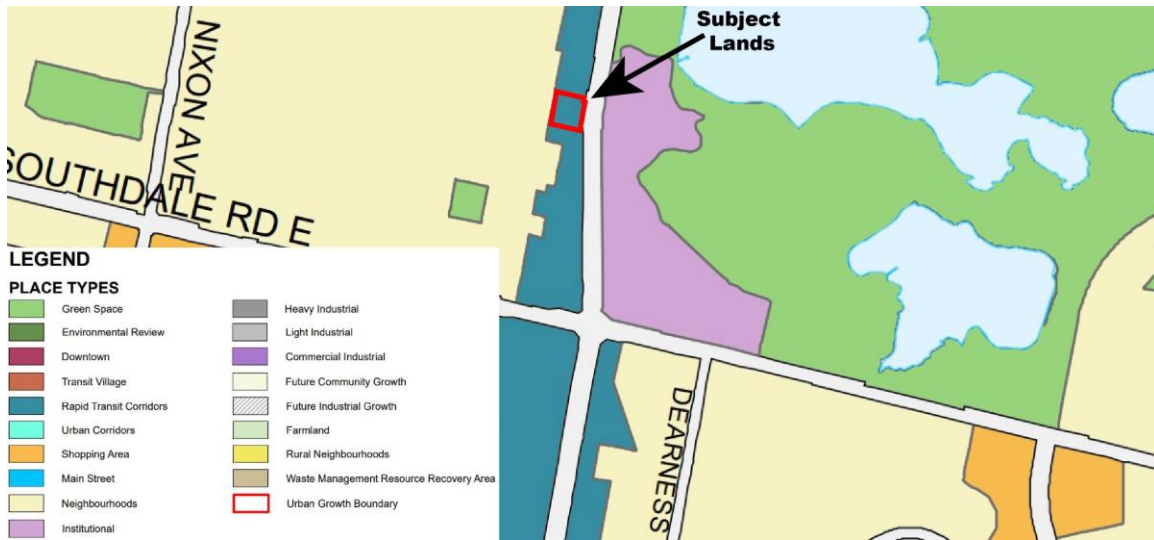
Given the above, the proposed use and associated amendments are consistent with the 2020 Provincial Policy Statement.

The London Plan (Official Plan):

The 2016 Official Plan (The London Plan) is the policy framework for all planning in London. It emphasizes growing inward and upward, to reduce the costs of growth, create walkable communities, revitalize urban neighbourhoods and business areas, protect farmlands, and reduce greenhouse gases and energy consumption. At the root of *The London Plan* is the goal of building a city that will be attractive as a place to live and invest in a highly competitive world and one that will offer the opportunity of prosperity to everyone. A strong and recurring theme of the Plan is to encourage appropriate, adaptive reuse of existing land and resources to facilitate desirable development.

The subject lands are identified within the “Rapid Transit Corridor” Place Type along a “Rapid Transit Boulevard” (Wellington Road) Street Classification in The London Plan (Figure 10).

Figure 10 – The London Plan – Place Types Map



The following table contains a policy analysis detailing how the proposed development conforms with The London Plan:

The London Plan (Official Plan) - Place Type Policies	
Policy	Response
<p>Section 837 – Range of Permitted Uses in the Rapid Transit Corridor Place Type</p> <p>1. A range of residential, retail, service, office, cultural, recreational, and institutional uses may be permitted within the Corridor Place Type.</p>	<p>According to The London Plan, “Institutional” uses are contemplated within the “Rapid Transit Corridor” Place Type, which includes “Emergency Care Establishments” and “Clinics”.</p>
<p>Section 497 - Homelessness Prevention and Housing. What Are We Trying to Achieve</p> <p>Through all the planning we do and the initiatives we pursue, our goal is to:</p> <ol style="list-style-type: none"> 1. Ensure that all members of our community have access to housing that is safe, secure, and suitable to their needs and ability to pay. 2. Deliver a coordinated and integrated individual and family-centered housing stability approach that is outcome-focused and designed to address, reduce, and prevent homelessness in London. 3. Provide an integrated mixture of affordable and adequate housing options for the greatest number of people in need. 4. Ensure that individuals and families experiencing homelessness obtain and 	<p>The intent of requesting “Emergency Care Establishments” and “Clinics” as permitted uses on the subject lands is have the appropriate zoning in place to potentially establish a “Hub” location as a part of the “London’s Health & Homelessness Response: Proposed Hubs Implementation Plan”.</p> <p>As previously mentioned, this plan intends to help the most marginalized Londoners move safely inside, become stabilized, supported, and connected to the right housing resources to help them become sustainably housed.</p> <p>Permitting “Emergency Care Establishments” and “Clinics” through the proposed Zoning By-law Amendment will allow for the existing building to</p>

<p>retain housing, and that individuals and families at risk of homelessness remain housed.</p> <ol style="list-style-type: none"> 5. Ensure quality housing is attainable for our most vulnerable populations, including affordable and supportive housing, housing needs of persons requiring specialized care, and related services. 6. Facilitate an adequate and appropriate supply of housing to meet the economic, social, health, and well-being requirements of Londoners. 7. Promote a choice of housing types so that a broad range of housing requirements is satisfied in a wide range of locations. 	<p>become equipped with the necessary facilities to appropriately serve London's community members currently experiencing homelessness.</p>
<p><u>Section 1092 - Emergency Care Establishments</u></p> <p>Emergency care establishments may be located on Civic Boulevards and Urban Thoroughfares and will be subject to the policies associated with the Place Type they are located in and the Planning and Development Applications policies in the Our Tools part of this Plan.</p>	<p>Given that the subject lands are located on the highest order street in The London Plan (Rapid Transit Boulevards) with the greatest accessibility and current/planned transit connections across the City of London, the proposed uses are appropriate and desirable in this highly convenient and valuable location.</p>

Given the above, the proposed use and associated amendments are consistent with The London Plan.

THE CITY OF LONDON ZONING BY-LAW

The subject lands are zoned “*Restricted Office (RO1)*” in the City of London Z.1 Zoning By-Law, as amended (Figure 11). Permitted uses within the RO1 Zone are currently limited to medical/dental offices and offices, therefore, a Zoning By-law Amendment will be required to permit the proposed uses.

Figure 11 – City of London Z.-1 Zoning By-law



It is proposed that the “*Restricted Office (RO1)*” Zone be amended to permit the following additional uses:

- Emergency Care Establishments; and,
- Clinics.

The above noted uses are appropriate for the subject lands and will allow for efficient utilization of the existing building, which is located on and near existing major commercial corridors and other established health care facilities (i.e. LHSC & Parkwood Hospital). As the proposed uses will not intensify the subject lands by any means, the existing parking will adequately serve the proposed uses and the existing permitted medical/dental and office-related uses.

Based on the findings of this report, the proposed range of uses are appropriate and desirable for the subject lands as the proposed Zoning By-law Amendment will allow for a more efficient utilization of the existing building within an area that is well suited to support “*Emergency Care Establishments*” and “*Clinics*”.

CONCLUSIONS

The request to permit “*Emergency Care Establishments*” and “*Clinics*” on the subject lands through the proposed Zoning By-law Amendment will allow for the existing building to become equipped with the necessary facilities to appropriately serve London’s community members currently experiencing homelessness.

It is our professional opinion that the location of the proposed uses within the existing building will not result in any significant undue impacts to the surrounding neighbourhood and proximate land uses. It is also our opinion that the proposed use represents a “good fit” within the area and recognizes and reflects the intent of The London Plan to locate “*Emergency Care Establishments*” and “*Clinics*” within primary and central locations, such as within the “*Rapid Transit Corridor*” Place Type. As no substantial changes to the exterior of the building or site layout are proposed, there are no anticipated or undue land use conflicts/impacts associated with the interior alternation of the building.

The proposed Zoning By-law Amendment is consistent with the PPS; the planned function for the subject lands, as prescribed by the London Plan; and does not substantially deviate from the current zoning of the property in accordance with the City of London Z.1 Zoning By-Law. It is our opinion that the subject lands can support the proposed use and is an appropriate location for “*Emergency Care Establishments*” and “*Clinics*”; and that the proposed Zoning By-law Amendment represents sound land use planning principles.

SUBMISSION PACKAGE

Please find enclosed copies of the following materials:

- The completed application form, including authorizations; and,
- The application fee cheque in the amount of \$14,417.00 made payable to the City of London.

We trust that the enclosed information is satisfactory and we look forward to working with Staff on this file. If you have any questions, or require further information, please do not hesitate to call.

Yours very truly,

ZELINKA PRIAMO LTD.



Aliyah Richards, BEDP
Planner

cc. Olde School Professional Properties Inc