



629 BASE LINE ROAD EAST, LONDON, ON.

PLANNING JUSTIFICATION **REPORT**

Official Plan Amendment & Zoning By-law
Amendment Application

[siv-ik] PLANNING
/ DESIGN



VERSION 1.0

ISSUED

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PREPARED FOR

629 Base Line Ltd.

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1.0 INTRODUCTION

This report has been prepared by Siv-ik Planning & Design Inc. for 629 Base Line Ltd. (the registered owner of the property) in support of an Official Plan and Zoning By-law Amendment application for the property municipally known as 629 Base Line Road East in the City of London. This report provides an independent professional analysis and opinion regarding the merits of the proposed Official Plan and Zoning By-law Amendment and has been prepared to satisfy the City of London's complete application requirements. The report explains how the proposed Official Plan and Zoning By-law Amendment aligns with the objectives of the Provincial Policy Statement (2020), the London Plan, represents sound planning, and is in the public interest.

The applications seeks to legally establish two additional dwelling units within the finished lower-level of the existing fourplex building, formalizing the conversion of the existing building to a legal 6-unit multiple-dwelling. An Official Plan Amendment is proposed through the addition of a Special Policy Area within the Neighbourhoods Place Type to allow for an apartment building use to be contained within the existing building. A Zoning By-law Amendment is also being sought to rezone property from the existing Residential R3 (R3-1) Zone that applies to the property to a site specific Residential R8-3() Zone. The proposed Zoning By-law amendment also includes special provisions to recognize the existing site conditions (i.e., setbacks, frontage, driveway width, and lot area). Overall, the proposed amendments are intended to allow for an efficient and appropriate use of the existing building.

Figure 1: Site Overview



The subject site is municipally identified as 629 Base Line Road East in the City of London and is located within the Highland Planning District in South London. The site is located on the south side of Base Line Road East, approximately 200m west of the intersection of Base Line Road East and Wellington Road. The site is approximately 953m² in size, rectangular in shape, and contains an existing two-storey fourplex building and accessory structure. Access to the second floor units are provided through exterior stairways, whereas first floor units have direct access to their units. The building contains additional finished space in the lower-level/basement that exhibits the physical characteristics generally required for legal residential dwelling units. Existing primary vehicle entry to the site is provided via a driveway connection accessed from Base Line Road East, leading to a five-stall vehicle parking area in the rear yard.

Additional details about the site and the context are summarized in Table 1 below.

Table 1: Site Statistics

Project Site Attributes	
Site Area	953.51m ² (0.09ha)
Frontage	21.9 metres (Base Line Road East)
Depth	43.0-44.6 metres
Existing Use(s)	Residential
Existing Buildings	Fourplex
Servicing	Full Municipal Services
Existing Zoning	Residential R3 (R3-1)
Official Plan (The London Plan)	Neighbourhoods
Street Classification	Neighbourhood Collector

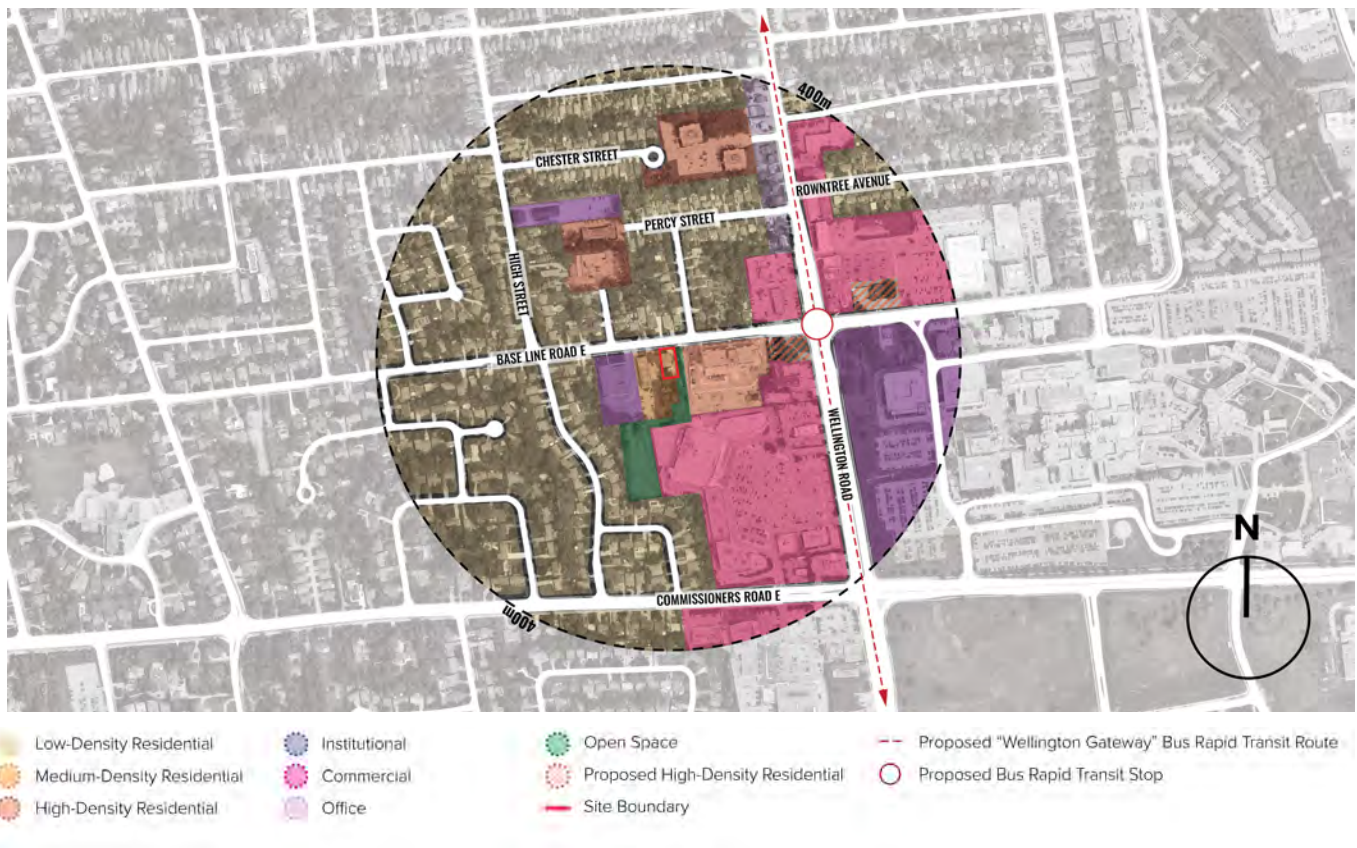
Note: An “Existing Conditions Plan” has been prepared by Siv-ik Planning & Design Inc. and is attached as Appendix ‘A’ to this report for further reference. The existing conditions information has been prepared based on publicly available data from the City of London and on-site observation.

2.0 SITE CONTEXT

2.1 Surrounding Land Use

As noted in Section 1.0 of this report, the site is located within the Highland Planning District. This neighbourhood encompasses the area generally bounded by Wharncliffe Road South, Commissioners Road West, Southdale Road West, and Wellington Road. The area within 400 meters (a 5-minute walk) of the site features a mix of residential types, including single-detached homes, mid-rise buildings, and auto-oriented commercial uses. To the north is Base Line Road East, an east-west connector with access to public and active transit. The surrounding area to the north and west includes mainly single-detached homes, some institutional uses, and isolated mid-rise buildings (4-6 storeys). To the east is a recently built 9-storey retirement building, commercial plazas, and lands recently rezoned for a 23-storey apartment building. Further east is Victoria Hospital and Children’s Hospital . South of the site is a large commercial shopping centre with grocery stores, personal services, and restaurants. The site is highly accessible, being near Wellington Road, a Rapid Transit route, with a planned station at Base Line Road East and Wellington Road, scheduled for construction from 2025 to 2027, and multiple LTC routes connecting to key areas and facilities.

Figure 2: Surrounding Land Use Map (400m)



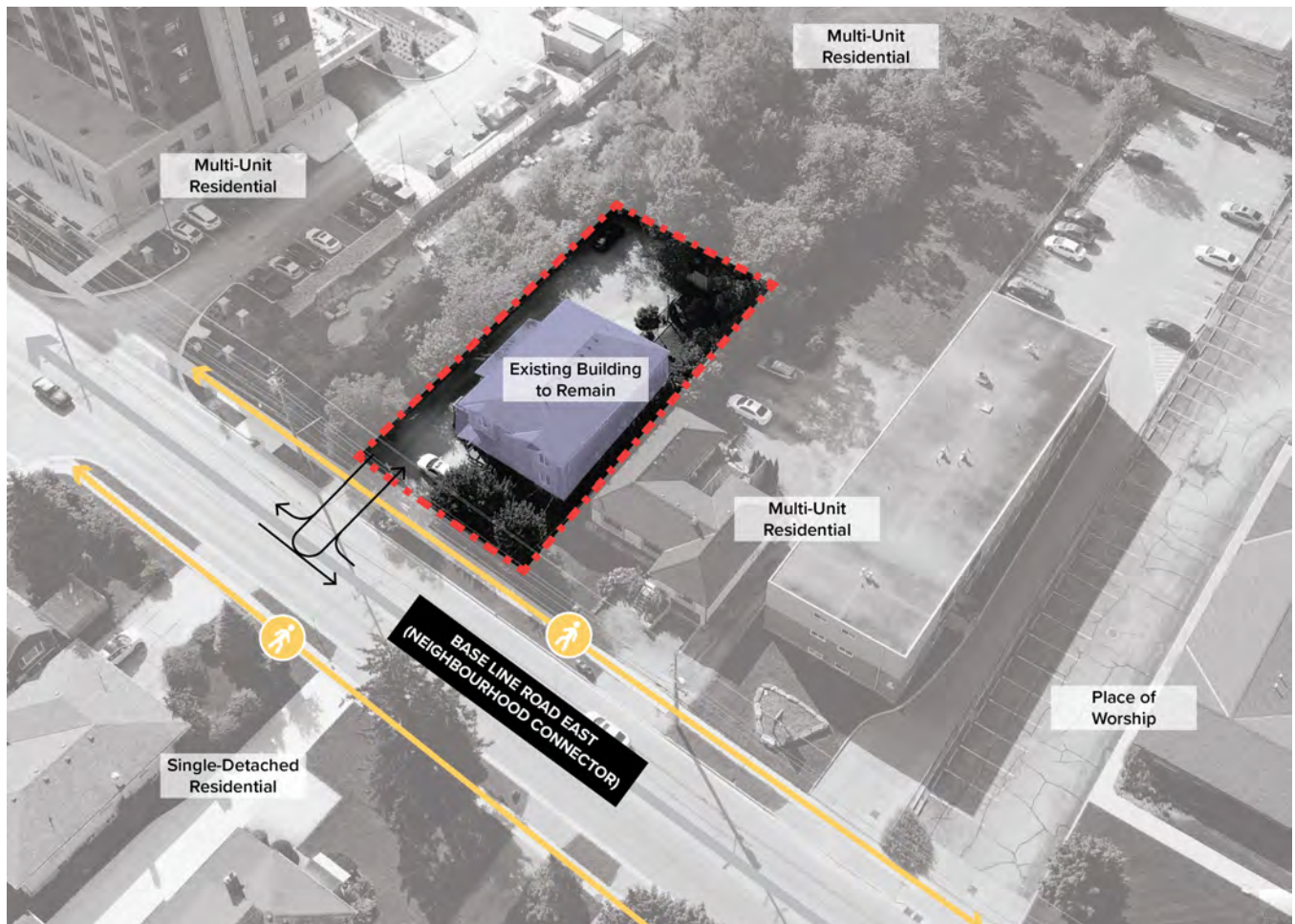
2.2 Site Analysis

The site analysis graphic below represents the existing physical characteristics of the site and the lands immediately surrounding the site. The site consists of a rectangular-shaped parcel with nearly 22 metres of frontage along Base Line Road East. The site is occupied by a two-storey fourplex dwelling and an accessory shed structure located in the rear yard. Vehicular access to the site is provided by an existing driveway accessed from Base Line Road East. Existing common outdoor amenity space (i.e., landscaped lawn) is located within the rear yard along the west property line.

In accordance with Map 3 – Street Classifications in the London Plan, the site has direct frontage onto a Neighbourhood Connector, Base Line Road East, consisting of a two-lane cross section with a single travel line in each direction and a series of intermittent centre left turn lanes. Municipal sidewalks are located on both sides of Base Line Road East. The site is well serviced by public transit, with a westbound LTC bus stop located 140m east of the site, and an eastbound LTC stop located approximately 180m west, near the intersection of Base Line Road East and Wellington Road.

From a servicing perspective, the existing building is served by full sanitary and water services.

Figure 3: Site Analysis



3.0 POLICY & REGULATORY FRAMEWORK

The following section of this report provides an overview of the applicable planning policy & regulatory framework that currently guides land use and development on the subject site. In this case, the key applicable statutory documents include the Provincial Policy Statement (2024), the London Plan, and City of London Zoning By-law (Z. -1). The following policies and regulations inform and guide the professional analysis of the proposal provided in Section 5.0 below.

3.1 Provincial Policy Statement, 2024:

The Provincial Policy Statement (PPS) provides policy direction on matters of Provincial interest regarding land use planning and development. The PPS is issued under Section 3 of the Planning Act. Section 3 of the Planning Act requires that land use planning decisions be consistent with the PPS, ensuring that matters of provincial interest, as identified in Chapter 2 of the Planning Act, are addressed. The PPS is a broad provincial policy document that is generally implemented through local municipal planning documents.

Although it is to be interpreted broadly, the following policy guidance is important to consider in the context of the Official Plan Amendment and Zoning By-law Amendment application for 629 Base Line Road East.

- ▶ Section 2.1.5 of the PPS encourages an appropriate range and mix of housing options with access to multimodal transportation options;
- ▶ This is further established within Section 2.2.1, which details that all housing options to meet the social, health, economic and well-being requirements of current and future residents should be permitting, including all types of residential intensification;
- ▶ The proposed development efficiently utilizes land and municipal infrastructure within a settlement area to enhance the existing neighbourhood. The subject lands are serviced by existing public infrastructure with no expansion required (2.2.1.c);
- ▶ The subject lands present an opportunity for the residential intensification of an existing buildings which effectively minimizes land consumption and servicing and construction costs without causing public health and safety concerns to support growth and long-term needs of the public (2.3.1.2);

In view of the PPS policies noted above, the proposed Official Plan Amendment and Zoning By-law Amendment will serve to enhance the viability and utility of an existing residential building. Allowing for the the conversion of the existing fourplex to a 6-unit multiple dwelling (i.e. apartment building), and rezoning the site to the R8 zone category, aligns with the Provincial Policy Statement by promoting efficient land use, economic development, and sustainability.

3.2 The London Plan:

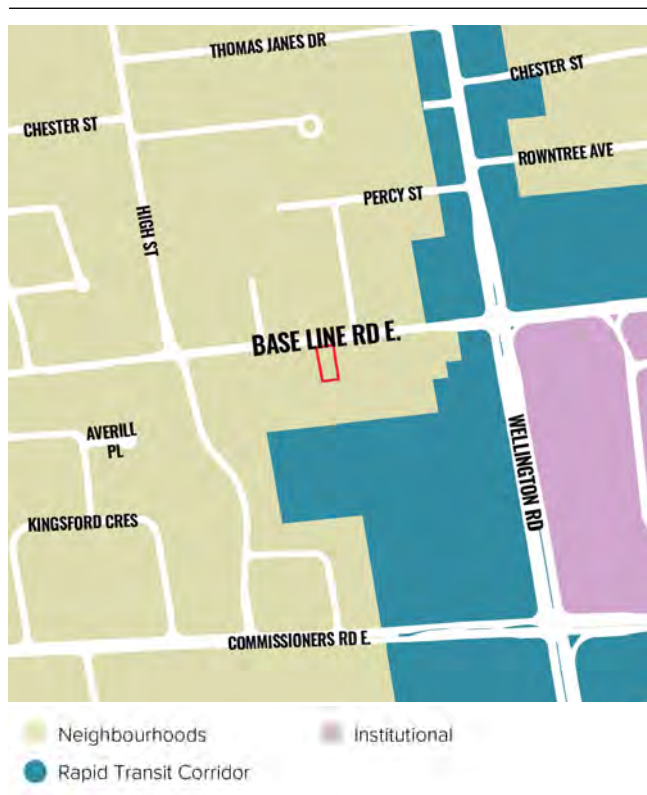
The figures on the next page represent excerpts from Maps 1 & 3 (Place Types and Street Types) of the London Plan. The project site contains direct frontage on Base Line Road East, which is identified as a Neighbourhood Connector, on Map 3.

Place Type Policies:

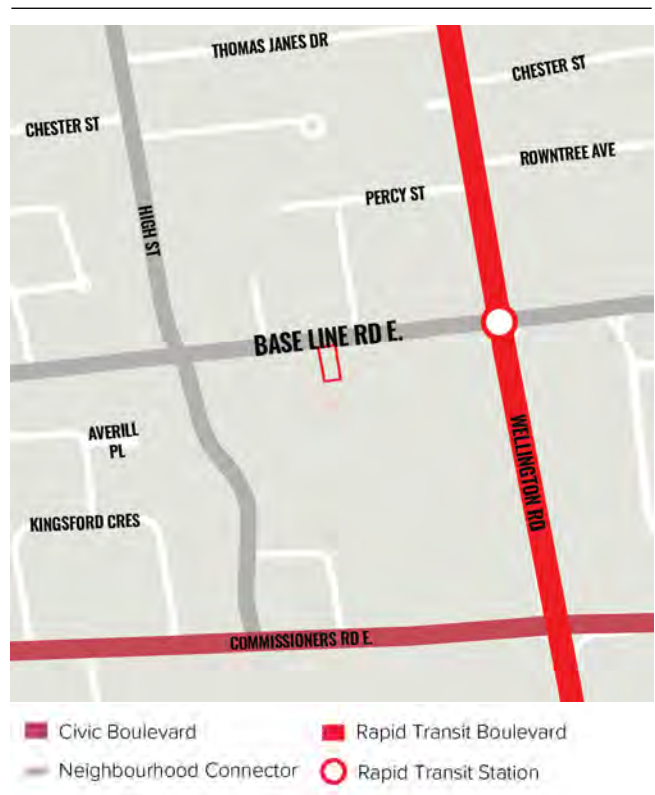
In accordance with Map 1 – Place Types, the project site is within the “Neighbourhoods” Place Type. Neighbourhoods are envisioned as diverse places that include a broad range of housing opportunities. Neighbourhoods are places that encourage intensification over the life of the London Plan with respect to existing character, while providing for strategic ways to create dynamic, lively and engaging places to live. Table 10 within the London Plan outlines the permitted uses within the Neighbourhoods Place Type based on street classification. In light of this context, the applicable London Plan policies permit a range of housing types including single-detached, duplexes, converted dwellings, triplexes and townhouses, with building heights of up to 3-storeys permitted.

For lands within Central London, within the Neighbourhoods Place Type and with primary frontage on a Neighbourhood Connector, fourplexes, stacked townhouses and low-rise apartment buildings are permitted with maximum heights of 4-storeys permitted.

Place Types (Map 1)



Street Types (Map 3)



Our Tools Policies:

All planning and development applications within the City of London are to be evaluated with consideration of the use, intensity, and form that is being proposed (1578_). With respect to the proposed Official Plan Amendment and Zoning By-law Amendment at 629 Base Line Road East, the proposal is sensitive to, and compatible with the surrounding existing residential, commercial and institutional context, and its planned context in proximity including future Rapid Transit route and mixed-use developments. The proposal fits the policy goals and objectives of the Place Type, by adding to the on-going functionality of the existing building through the addition of two dwelling units located in the lower level, while not creating adverse impacts on the surrounding lands.

3.3 City of London Zoning By-law (Z. -1)

The subject lands are currently zoned Residential R3 (R3-1) as per the City of London Z. -1 Zoning By-law. The R3 zone provides for and regulates low to low-medium density residential development. The R3-1 zone is generally applied to existing inner-city developments on smaller lots, as well as being applicable to newer developments where off-site amenities are present. There are 4 variations to the R3 Zone, differentiated on the basis of site requirements to provide for a range of lot sizes and dwelling styles throughout low-medium density areas in the City. The applicable regulations of the R3-1 Zones are listed in Table 2 below.

Table 2: Existing Zoning Breakdown

Regulation	R3-1
Permitted Uses	Single detached dwellings; Semi-detached dwellings; Duplex dwellings; Triplex dwellings; Converted dwellings; Fourplex dwellings.
Lot Area (min.)	550m ² (Residential Type: Fourplexes)
Lot Frontage (min.)	12.0m (Fourplexes)
Front & Exterior Yard Depth (min.)	6.0m (Secondary Collector)
Interior Side Yard Depth (min.)	1.2 metres (3.9 feet) plus 0.6 metres (2.0 feet) for each storey or part thereof above one storey on one side and 3.0 metres (9.8 feet) on the other side. (Fourplexes)
Rear Yard Depth (min.)	6.0m (Fourplexes)
Landscaped Open Space (min.)	20% (Fourplexes)
Lot Coverage (max.)	45% (Fourplexes)
Height (max.)	12.0m (Fourplexes)

Section 4.19 - Parking:

Section 4.19 (10) of the Zoning By-law outlines the parking supply requirements for the various land uses listed and defined in Section 2 of the By-law. As shown on Appendix A - Existing Conditions Plan, the site has capacity to accommodate approximately 5 parking stalls in its rear parking area. As the site is not within the "Area Exempt from Minimum Parking Requirements" the minimum parking rates as per Section 4.19 apply. Fourplexes and apartment dwellings require 0.5 parking stalls per dwelling. To accommodate the proposed and existing residential units, and as shown on the attached Existing Conditions Plan, the site has capacity to accommodate 5 parking stalls in the rear yard parking area.



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4.0 THE PROPOSAL

4.1 Official Plan Amendment:

Policy 25 of the London Plan emphasizes that, as a long-term overarching plan, the plan itself cannot possibly contemplate how each property within all parts of the city may develop. Because of this, it is acknowledged and expected that the London Plan will change over time. As per policy 25, privately or municipally initiated Official Plan Amendments that relate to an individual site or series of properties is one of the ways in which it is anticipated that the plan will be modified to remain responsive to opportunities that arise. While changes can be made, it is important that such modifications remain consistent with the policy framework that has been established to evaluate such change and that the change should not undermine the purpose and intent of the plan overall. Through our planning and design analysis, we have conducted a critical review of the relevant local and provincial planning objectives in conjunction with a detailed analysis of the context of this portion of the Highland Neighbourhood.

In order to recognize the special/unique characteristics of this site and potential within the existing building for intensification, a site specific policy is proposed which would establish an additional permitted use on the project site. The following language represents the proposed Official Plan Amendment:

Specific Policies for the Neighbourhoods Place Type:

629 Base Line Road East

XXXX_ For the lands in the Neighbourhoods Place Type located at 629 Base Line Road East, the existing building shall be permitted to be used as an apartment building as of the date of the passing of this amendment.

4.2 Zoning By-law Amendment

The proposed Zoning By-law seeks to establish a framework to support the conversion of the existing fourplex to a legal 6-unit multiple dwelling. The proposed R8-3() Zone will allow for the desired apartment building use within the existing structure, while also including special provisions that recognize the existing conditions of the site (i.e., setbacks). The existing R3-1 Zone category is maintained to provide for low-density uses in addition to a set of built form standards for low-density residential form.

PROPOSED ZONING

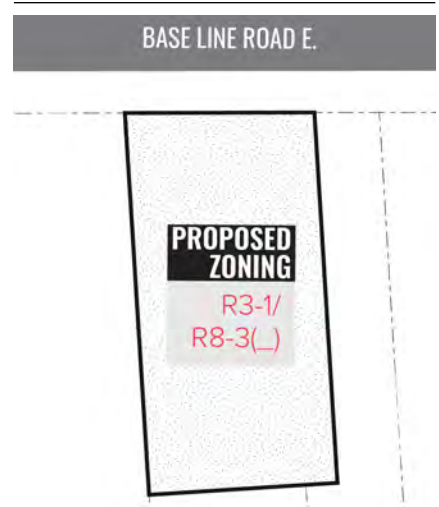


Table 3: Proposed Zoning By-law Regulations

Regulation	Existing Standard R8-3	Proposed R8-3()
Permitted Uses	Section 12.2	Apartment Building (within existing building)
Lot Area (min.)	1,000m ²	953m ² (as existing)
Lot Frontage (min.)	25.0m	21.9m (as existing)
Front & Exterior Yard Depth (min.)	6 metres (19.7 feet) plus 1 metre (3.3 feet) per 10 metres (32.8 feet) of main building height or fraction thereof above the first 3.0 metres (9.8 feet)	6.0m (as existing)
Interior Side & Rear Yard Depth (min.)	1.2 metres (3.9 feet) per 3 metres (9.8 feet) of main building height or fraction thereof above 3 metres (9.8 feet), but in no case less than 4.5 metres (14.8 feet)	Interior Side Yard: 1.5m (as existing)
Landscaped Open Space (min.)	30%	-
Lot Coverage (max.)	35%	-
Height (max.)	13.0m	-
Density (max)	65uph	-
Off-Street Parking (min.)	0.5/unit (Apartment)	-
Driveway Width (min.)	6.0m	3.0m (as existing)

- : No Change

4.3 Purpose of the Application

The purpose of the proposed Official Plan and Zoning By-law Amendment is to establish permissions for an additional two dwelling units within the building's lower-level/basement space, effectively converting the existing fourplex to a 6-unit multiple dwelling. This proposal is not intended to facilitate any expansion, enlargement, or significant exterior modifications to the existing buildings at 629 Base Line Road East.

5.0 PLANNING ANALYSIS

The following analysis examines the impacts and implications of the proposed Official Plan Amendment and Zoning By-law Amendment with respect to use, intensity, form and function. As explained in Section 4.0 – The Proposal – of this report, the proposed Official Plan Amendment and Zoning By-law Amendment is not intended to facilitate any addition or expansion to the existing building at 629 Base Line Road East. The scope of this analysis is focused on the general proposed Special Policy Area and zoning framework and how it has been structured to ensure desirable outcomes, consistent with the applicable policies for the site.

5.1 Official Plan Amendment Rationale

To better recognize the existing built form and support residential intensification goals while addressing the unique context and characteristics of the neighbourhood, a site-specific policy for the site is being proposed. This policy would allow an additional permitted use (an apartment building) limited to the existing fourplex structure.

The overarching objective of the Neighbourhoods Place Type is to encourage a variety of housing options that promote affordability, support a compact and efficient built form, and enable residents to stay in their communities if they choose. Policy 918_2 further emphasizes that neighbourhoods should be designed for diversity and should avoid separating different housing types, intensities, and forms. According to the London Plan's street classification approach to use and intensity, townhouses and triplexes up to 3 storeys are typically permitted. However, low-rise apartment buildings are also contemplated and permitted along Neighbourhood Connectors within Central London, as indicated by Table 10. While the project site is not located in Central London, many of the same amenities and services located there exist within proximity of the project site. The site is within walking distance of a future rapid transit station, located at Base Line Road East and Wellington Road, in addition to a significant commercial and institutional land uses. This gentle form of intensification provides additional opportunities for residents to utilize public and active transportation options within an increasingly walkable and well-connected neighbourhood.

The London Plan encourages intensification within existing neighbourhoods to help support aging in place, diversity of built form, affordability, vibrancy, and the effective use of land in neighbourhoods (937_-958_). In addition to the general City Design policies, the Neighbourhoods Place Type policies provide additional form-based policy direction for intensification proposals. The overall goal of the policies is to ensure that intensification projects are sensitive to, compatible with, and fit within the existing and planned neighbourhood context. The proposed development is intended to be entirely located within the existing 2-storey fourplex building on the site, with no exterior modifications or site alterations required or proposed to accommodate the two additional units. In this regard, the proposed development is compatible with the surrounding neighbourhood context.

As detailed in Section 3 - Planning Framework (pg. 7) of this report, the "Our Tools" policies of the London Plan provide guidance for considering special exceptions and policies when existing policies do not fully align with City Council's vision for a specific site. According to policy 26, the London Plan is not intended to review each site individually. Instead, it offers a general approach to intensification and redevelopment in the Neighbourhoods Place Type. Through detailed review and site analysis conducted by Siv-ik, specific characteristics have been identified that require additional guidance for the built form on this site, which do not fit neatly within the existing Place Type policies. Below are the relevant policies of 1730_, along with our professional planning opinion on how these policies have been addressed through the proposed site-specific policy.

1730_The adoption of policies for Specific Areas may be considered in limited circumstances where the following conditions apply:

Condition	Rationale	Meets	
		Y	N
1. The proposal meets all policies of the Plan beyond those that the specific policy identifies.	The proposed Site Specific Policy only alters the permitted uses on the site and sets a defined requirement relating to the location of said use which ensures that the proposed intensification adheres to all other policies of the plan.	●	○
2. The proposed use cannot be reasonably altered to conform to the policies of the place type.	The proposed additional use of a low-rise apartment building is to occur within the existing fourplex building on the site. The existing structure contains space within the finished lower level that exhibits the physical characteristics generally required for legal residential dwelling units, presenting a unique opportunity for intensification within Neighbourhoods. The purpose of proposed special policy area is to establish the permissions for these additional dwelling units.	●	○
3. The proposed policy is in the public interest, and represents good planning.	The proposed special policy provides for a suitable framework for an appropriate level of residential intensification within an existing structure without negative impacts on adjacent properties. It is fully supported by the overall intention of the London Plan and by provincial planning objectives for housing and intensification within existing Neighbourhoods.	●	○
4. The proposed use is sufficiently unique and distinctive enough that it does not establish an argument for a similar exception on other properties in the area.	Given the special policy is limiting the proposed additional use to the existing fourplex building, which exhibits suitable interior space for two additional dwelling units, on this specific parcel, the proposed special policy represents a sufficiently unique situation.	●	○
5. The proposed policy does not have an adverse impact on the integrity of the place types policies or other relevant parts of this Plan.	The overall proposal remains consistent with the permitted uses and intensities permitted along Neighbourhood Connectors in certain conditions in the Neighbourhoods Place Type. Given the uniqueness of this site, the special policy which allows for an apartment building will not undermine the integrity of the plan and the purpose of Table 10.	●	○

Based on the above, the proposed Special Policy Area for the development at 629 Base Line Road East meets the public interest, and represents sound planning.

5.2 Zoning By-law Amendment

The following analysis examines the impacts and implications of the proposed Zoning By-law Amendment with respect to use, intensity, form, and function. As explained in Section 4.0 - The Proposal - of this report, the proposed Zoning By-law Amendment is not intended to facilitate any addition or expansion to the existing building at 629 Base Line Road East. The scope of this analysis is focused on the general proposed zoning framework and how it has been structured to ensure desirable site outcomes, consistent with the applicable policies for the site.

The proposed Zoning By-law seeks to establish a framework to support the conversion of the existing fourplex to an apartment building. The proposed R8-3(⌒) Zone will provide for the apartment building uses to occur within the existing building. The proposed zoning framework enables the additional apartment building use while recognizing existing site conditions (i.e., lot area, lot frontage, setbacks, etc.). The existing R3-1 Zone Category is maintained to provide for low-density uses in addition to a set of building form standards for low-density residential development.

It is important to note that, should this Zoning By-law Amendment be approved, it would not be subject to the City's Site Plan Control By-law, as the total number of units contemplated is less than 10.

5.3 Land Use

Policy 916_ of the London Plan describes the intended function and purpose of the Neighbourhoods Place Type. As per 916_, Neighbourhoods are intended to be vibrant and diverse places that include a broad range of housing opportunities. Intensification within the Neighbourhoods is fundamentally important to achieve this direction for the Place Type. The proposal to convert the existing 2-storey fourplex structure into a 6-unit apartment building represents "light" forms of intensification within an established neighbourhood. The building can accommodate the two additional dwelling units in the lower-level with no exterior modifications required.

The site can also accommodate the additional dwelling units in terms of available parking and outdoor landscaped amenity space. There are currently five (5) surface parking stalls located in the rear yard. The applicable parking requirements for an apartment building in the Zoning By-law require 0.5 parking stalls per unit. The addition of 2 dwelling units would result in a parking rate of 0.8 parking stalls per unit, compliant with zoning regulations and supportive of active and public transportation opportunities.

The site is made up of 37.6% landscaped open space, which exceeds the 30% required in the R8 zone, and nearly doubles the requirements of the existing R3-1 Zone (20%). The site is able to accommodate the proposed two dwelling units within the lower-level of the existing building from a functionality perspective.

5.4 Existing Site Conditions

The proposed Zoning By-law contains special provisions to recognize the existing conditions of the project site with respect to the requested R8-3 Zone. Special provisions are required to address deficiencies in lot area, lot frontage, front yard setback, and minimum driveway width, all of which are existing conditions and have remained unaltered since their construction.

The size and shape of the project site has demonstrated that it can accommodate intensification in its current configuration by meeting lot coverage, landscaped open space and parking requirements required by the proposed R8 zone, as well as the existing R3-1 Zone. In order to implement the proposed intensification, the existing lot configuration must be recognized through the By-law. The existing lot configuration provides for sufficient space to accommodate the existing and proposed dwelling units and maintain site functionality.

The existing drive aisle width is 3.0m. Due to the nature of the proposed development, there is insufficient space for enlargement of the drive aisle to facilitate the required 6.0m width. There is no enlargement of the surface parking area nor an increase in provided parking stalls. The current configuration of the parking area sees little to no conflict with two-way traffic and meets the needs of the current residents. The addition of two residential units to the existing building is not anticipated to create any additional vehicular conflicts through the drive-aisle.

5.5 Site Servicing

The project site is currently serviced by municipal water and sanitary systems, which have been confirmed to support the four existing residential units. The two additional units are of similar size to the existing units, and are not anticipated to create any issues or exceed the existing infrastructure capacity.

In this way, the proposal represents an efficient use of existing municipal infrastructure, supporting cost-effective residential intensification on the project site. By leveraging the existing servicing, this development avoids the need for significant new servicing investments, in addition to aligning with sustainable development principles within the PPS and London Plan by minimizing resource use and disruption.



6.0 CONCLUSIONS

The policies for the Neighbourhoods Place Types envisions these places as vibrant and diverse, with a range of housing options. The policies within the Place Type also contemplates and encourages residential intensification, so long as it is sensitive to the existing context. The proposed Official Plan Amendment and Zoning By-law Amendment provides for an appropriate and specific special policy area and zoning framework to guide intensification at 629 Base Line Road East, in a manner that supports the continued use of the existing building stock through additional land use permissions and special provisions to recognize existing site conditions. The proposed Special Policy Area limits the proposed higher intensity use to the existing building, and the corresponding proposed R8-3() zone would permit the apartment building use and higher density. This proposed development is small-scale in nature, limited to the existing conditions, and is not intended to be a major traffic generator that would lead to compatibility issues.

In light of the foregoing, the proposed Official Plan Amendment and Zoning By-law Amendment represents sound land use planning, is in the public interest and implements the applicable municipal planning framework.

Dan Murphy, MA, BAA

APPENDICES

Existing Conditions Plan A



APPENDIX A: EXISTING CONDITIONS PLAN

