



Planning Justification Report

Meadowbrook Business Campus London, Ontario

BlueStone Properties Inc.

December 11, 2024



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1.0 INTRODUCTION AND SUMMARY

This Planning Justification Report has been prepared in support of an application for a Zoning By-law Amendment on behalf of the proponent, BlueStone Properties Inc., to expand the permitted range of uses within the Meadowbrook Business Campus at 4023 - 4096 Meadowbrook Drive, 4474-4500 Blakie Road, and 169 - 207 Exeter Road (the “subject lands”). The proposal will expand the range of compatible commercial and light industrial use permissions across the entirety of the subject lands, in addition to the existing uses within the established business park.

In February 2024, Planning Act applications were submitted for an Official Plan Amendment (“OPA”) and a Zoning By-Law Amendment (“ZBA”) (File No. OZ-9706) to allow a greater range of compatible commercial and office uses on the subject lands. The applications were approved by City of London Council in May, 2024, and are now in full force and effect.

BlueStone Properties Inc. intends to expand the range of permitted commercial and light industrial uses within the existing buildings in the business park. The Zoning By-Law Amendment intends to accommodate a shift in market demand from industrial to commercial uses in the short-term future, while retaining flexibility to permit redevelopment for residential uses in the long-term future. There are no redevelopment plans for the subject lands at this time. Rather the present application seeks to allow a broader range of uses in existing buildings.

This report concludes that:

- The proposed Zoning By-law Amendment is consistent with the Provincial Planning Statement (2024);
- The proposed Zoning By-law Amendment is in conformity with the *London Plan*, which is reflected in the proposed additional range of uses; limited potential for land use conflicts; and ability of the lands to transition to residential uses over the long-term;
- The proposed Zoning By-Law Amendment conforms with the applicable policies in the Southwest Area Secondary Plan (“SWAP”), and facilitates appropriate flexibility for the existing business park to adapt to changing market demands in the short- to medium-term; and,
- The proposed expansion of uses will facilitate the adaptability and re-use of existing buildings within a thriving economic area to ensure the business park remains viable until comprehensive redevelopment occurs.

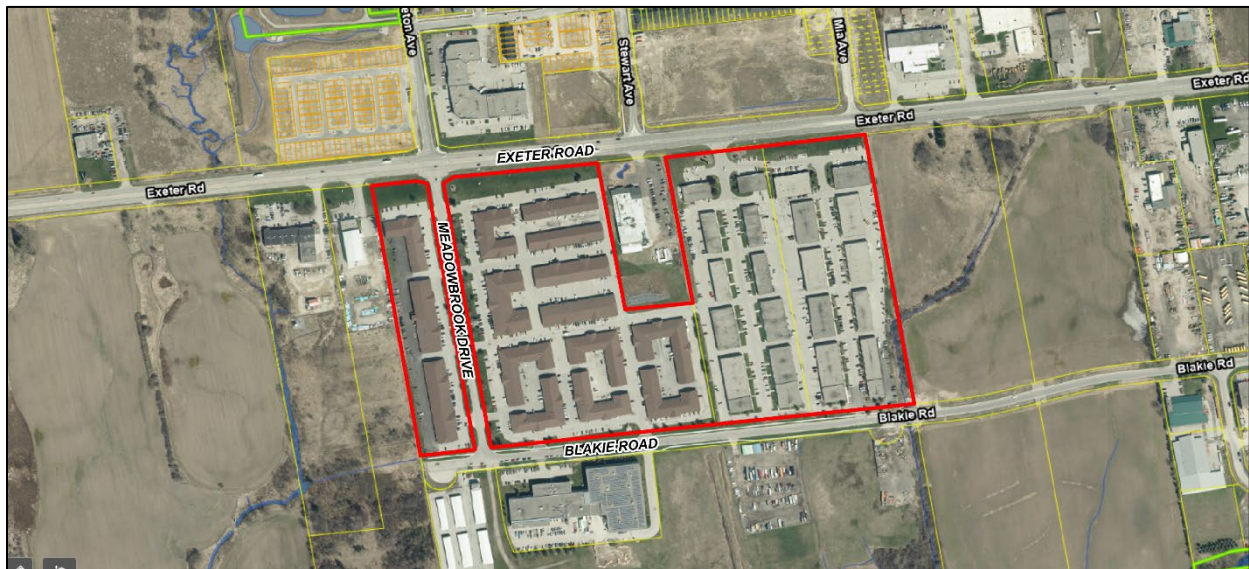
2.0 SUBJECT LANDS

2.1 SITE DESCRIPTION

The 19.6ha subject lands are located between Exeter Road and Blakie Road, on either side of Meadowbrook Drive (Figure 1). The subject lands are comprised of four property parcels, each containing several buildings with a variety of uses, including commercial and light industrial uses, restaurants, support offices, and professional offices, together which are known as the Meadowbrook Business Park.

There are multiple vehicular entrances to the subject lands from Meadowbrook Drive, Blakie Road, and Exeter Road. An internal private road network accommodates vehicular movement to individual units, where parking is provided in front of each unit.

Figure 1 – Subject Lands Aerial Photo



2.2 SPATIAL ANALYSIS AND NEIGHBOURHOOD CHARACTER

The subject lands are located within an area undergoing a transition from historically light industrial uses to residential uses as the broader area begins to develop on full municipal services. Public transportation travelling east-west is available on Exeter Road (Route #28: White Oaks Mall – Lambeth). Exeter Road and Meadowbrook Drive, developed when the area was primarily industrial, do not have pedestrian sidewalks. Blakie Road has been recently redeveloped, and does provide pedestrian sidewalks on both sides of the road.

The subject lands are proposed to be utilized for a mix of light industrial and commercial uses within the existing buildings. The primary public interface of the subject lands is defined by the existing street-facing multi-unit commercial buildings, which are set back from Exeter Road and have minimal pedestrian activity. Landscaping features abutting Exeter Road provide minimal visual screening of parking and other hardscaped surfaces. Pedestrian features, such as walkways and seating areas, are located throughout the site to provide a pedestrian realm and dedicate

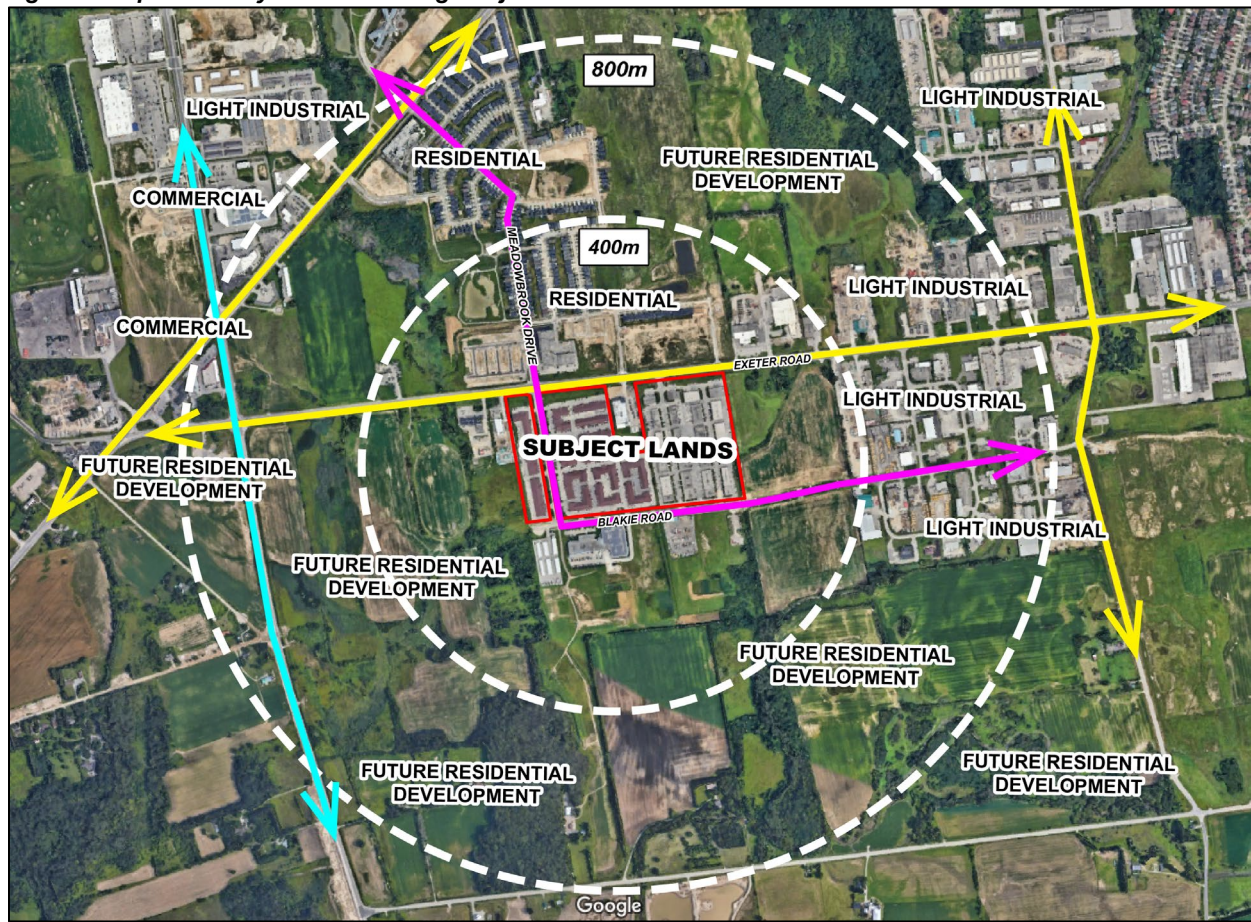
outdoor amenity space for customers and employees. Loading and refuse areas are located on a laneway internal to each grouping of buildings, to the rear of the uses to provide visual screening from main vehicular and pedestrian traffic areas.

The subject lands are already connected to full municipal services. A Sanitary Capacity Brief was completed in December 2023 in support of the previously-approved OPA-ZBA applications, which confirmed adequate downstream capacity within the sanitary sewers to accommodate proposed additional uses within the existing building supply (see Section 5.0 below). The existing watermain and storm sewers have capacity to supply the proposed commercial uses. Garbage will be stored externally near the loading areas of each building to eliminate adverse visual and potential odour impacts.

Figure 2 below shows the subject lands, and notable features and land uses within 400m and 800m radii of the site. The two radii represent walking distances of approximately 5 and 10 minutes, respectively, although due to incomplete sidewalk networks and other barriers, the radii may not represent true walking times.

Road designations in the *London Plan* are depicted on Figure 2 as: “Urban Throughfare” in blue; “Civic Boulevard” in yellow; and “Neighbourhood Connector” in pink.

Figure 2 – Spatial Analysis Surrounding Subject Lands



400m Radius

Areas within 400m (approximately 5 minutes walking distance) are comprised primarily of established light industrial and service uses, vacant lands used for agricultural purposes, and newly developed residential uses. In the immediate vicinity of the subject lands, residential and commercial uses are located to the north across Exeter Road, recently developed with single-storey, large-floorplate commercial uses, and medium-density residential uses typically in the form of townhouses. Additional residential units are under construction. Public transportation is available, however, there are no pedestrian sidewalks available.

Lands to the south of Blakie Road are vacant and currently used as cultivated fields, but are planned for future development. SWAP plans that this future development area will have a similar character to the residential uses to the north of Exeter Road. Watercourses tributary to Dingman Creek flowing north-south are located to the east and west of the subject lands. Lands located to the east and west also contain agricultural uses, and are planned for residential development. The subject lands are, in effect, a historical land use now surrounded by existing, developing, and future residential lands.

800m Radius

Lands within an 800m radius (approximately 10 minutes walking distance) are comprised of a similar mix of land uses, including light industrial uses, residential uses, agricultural uses and vacant lands. Some commercial uses are also found within the 800m radius.

The northern extent of the 800m radius contains additional lands designated for future residential development, and some open spaces associated with environmentally sensitive areas. It is anticipated that future residential development will contain similar characteristics and densities to those found in the 400m radius. Further to the south, lands are currently utilized for agriculture (cash crops), but are planned for future residential development.

Lands further to the east are comprised of light industrial uses, reflecting the character of the existing business park toward White Oak Road with single-storey, large-floorplate buildings. Internal road networks provide for convenient vehicular movement, with little pedestrian infrastructure. The western extent of the 800m area contains lands utilized for agricultural purposes (cash cropping), with the LTC bus depot and some commercial uses in the Wonderland Corridor.

Given the applicable land use policy framework, availability of servicing, and location of the subject lands, the site provides an opportunity to incorporate a greater range of uses within the existing development to support the character and planned function of the area. The subject lands have convenient vehicular access, maintain the historically industrial character of the area, and seek increased flexibility to adapt for a range of more sensitive uses as the neighbourhood continues to transition to residential uses.

3.0 PROPOSED AMENDMENT

A Zoning By-law Amendment (“ZBA”) is requested to rezone all parts of the subject lands to include the “*Light Industrial (LI2)*” and “*Light Industrial (LI3)*” zones, in addition to the existing zoning permissions, to provide standardization across the Meadowbrook Business Campus.

The following uses are permitted within the various standard “*Light Industrial (LI)*” zones which would apply to all of the subject lands (see Figure 5):

LI1

- Bakeries;
- Business service establishments;
- Laboratories;
- Manufacturing and assembly industries;
- Offices support;
- Paper and allied products industries excluding pulp and paper and asphalt roofing industries;
- Pharmaceutical and medical product industries;
- Printing, reproduction and data processing industries;
- Research and development establishments;
- Warehouse establishments;
- Wholesale establishments;
- Custom workshop;
- Brewing on premises establishments;
- Service trade;
- Existing self-storage establishments;
- Artisan workshop;
- Craft brewery; and,
- Tow truck business.

LI2

- Any use permitted in the LI1 variation;
- Dry cleaning and laundry plants;
- Food, tobacco and beverage processing industries excluding meat packaging;
- Leather and fur processing excluding tanning;
- Repair and rental establishments;
- Service and repair establishments;
- Service trades; and,
- Textile processing industries.

LI3

- Assembly halls;
- Commercial recreation establishments;
- Day care centres;
- Private clubs; and,
- Private parks.

LI4

- Any use permitted in the LI1 variation;
- Automotive uses, restricted;
- Clinics;
- Convenience service establishments;
- Convenience stores;
- Day care centres;
- Financial institutions;
- Medical/dental offices;
- Personal service establishments; and,
- Restaurants.

LI4 (10)

- All uses permitted in the LI4 zone;
- Office, business;
- Office, professional; and,
- Office, service.

LI7

- Automobile body shops;
- Automobile repair garages;
- Building or contracting establishments;
- Repair and rental establishments;
- Service and repair establishments;
- Service trades; and,
- Truck sales and service establishments;
- Custom workshops;
- Tow truck business.

Note that the requested zone variations to apply to the entirety of the subject lands (“LI2” and “LI3”) are already applicable to the southwest quadrant. The ZBA seeks to apply these zone variations to the portions of the subject lands which do not currently have those permissions, while retaining all other zone variations across the subject lands, resulting in the same zoning applied to the entire business park.

4.0 LAND USE POLICY AND REGULATORY ANALYSIS

The following sections of this Planning Justification Report provide analysis of the proposed application with respect to applicable policy and regulatory documents, including the Provincial Planning Statement (2024), the *London Plan* (2016), the Southwest Area Secondary Plan (2014) and the City of London Zoning By-law (Z.-1).

4.1 PROVINCIAL PLANNING STATEMENT, 2024

The Provincial Planning Statement (PPS) is issued under Section 3 of the *Planning Act* and “provides policy direction on matters of provincial interest related to land use planning and development.” In accordance with the *Planning Act*, all decisions affecting land use planning matters shall be consistent with the policies contained in the PPS. The application is generally consistent with applicable PPS policies as follows:

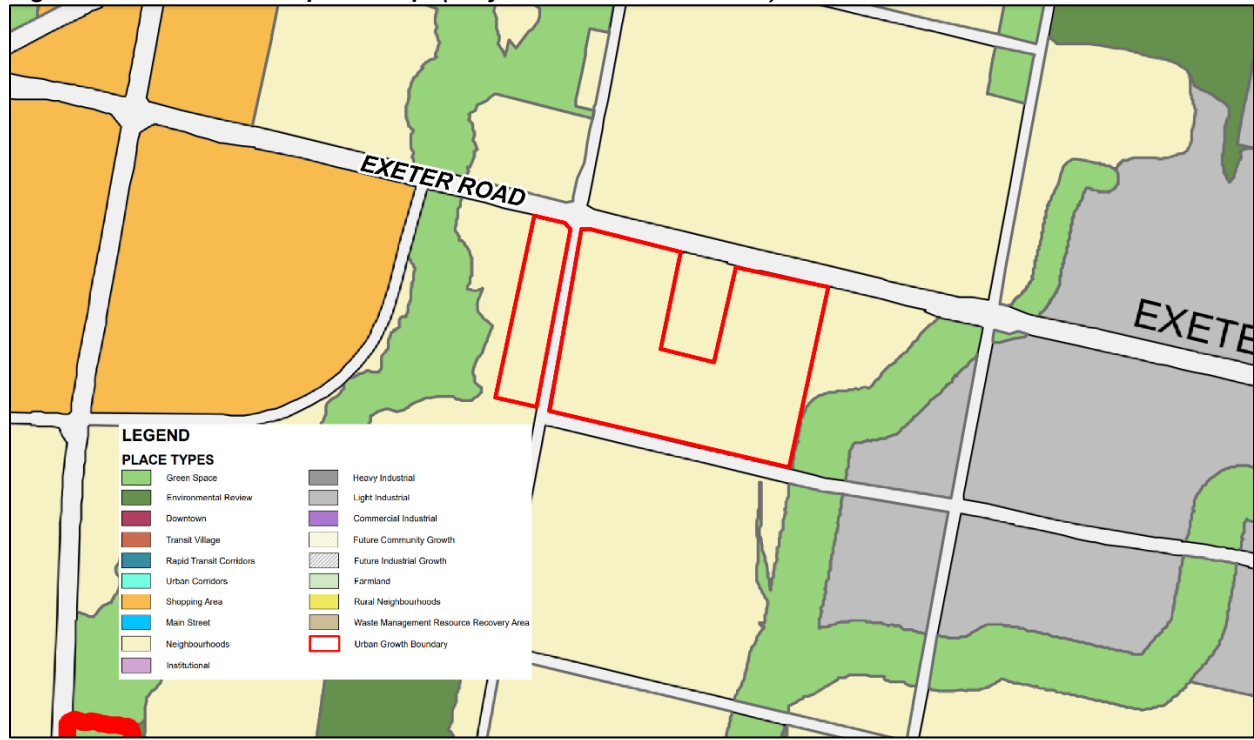
- The proposed range of uses efficiently utilizes land and municipal infrastructure within a settlement area, enhancing the existing commercial business park. The subject lands are serviced by existing public infrastructure, and no infrastructure expansion is required (2.3.1.2);
- The subject lands present an opportunity for the reuse of existing buildings and/or redevelopment, which effectively minimizes land consumption and servicing and construction costs without causing public health and safety concerns to support the growth and long-term needs of the public (2.3.1.4);
- The proposal for the subject lands directs commercial and light industrial uses to a location that has appropriate separation from existing sensitive land uses and avoids potential adverse impacts, including noise and contaminants that could arise from an abrupt transition in land use (3.5); and,
- The proposal will increase economic diversity and competitiveness by facilitating efficient and adaptive reuse of existing buildings and infrastructure for a greater range of uses that will contribute to a liveable and resilient community (2.8.1.1).

Based on the above analysis, the proposed changes in use are consistent with the objectives and policies of the PPS.

4.2 LONDON PLAN, 2016

The *London Plan*, adopted in 2016, provides a policy framework that plans for vibrant, healthy and fulfilling neighbourhoods with a focus on compact development and revitalization in the community. The proposed development is located within the “*Neighbourhoods*” Place Type as identified on Figure 3, following page. The subject lands have frontage on Exeter Road, identified as a “*Civic Boulevard*” in the *London Plan*.

Figure 3 – London Plan Map 1 Excerpt (subject lands outlined in red)



The following details the consistency of the proposed expansion of permitted uses with applicable policies of the *London Plan*:

Policy 154.1

Through our urban regeneration efforts, we will stimulate the repurposing of the existing building stock, where the previous use of such buildings is no longer viable.

The proposed addition in uses would allow for the simple repurposing of existing buildings on the subject lands without detracting from the existing light industrial uses. While the current uses are still viable on the subject lands, there are opportunities to transition the existing building stock to accommodate a greater range of uses which fit with the intended future use of the lands.

Policy 1556

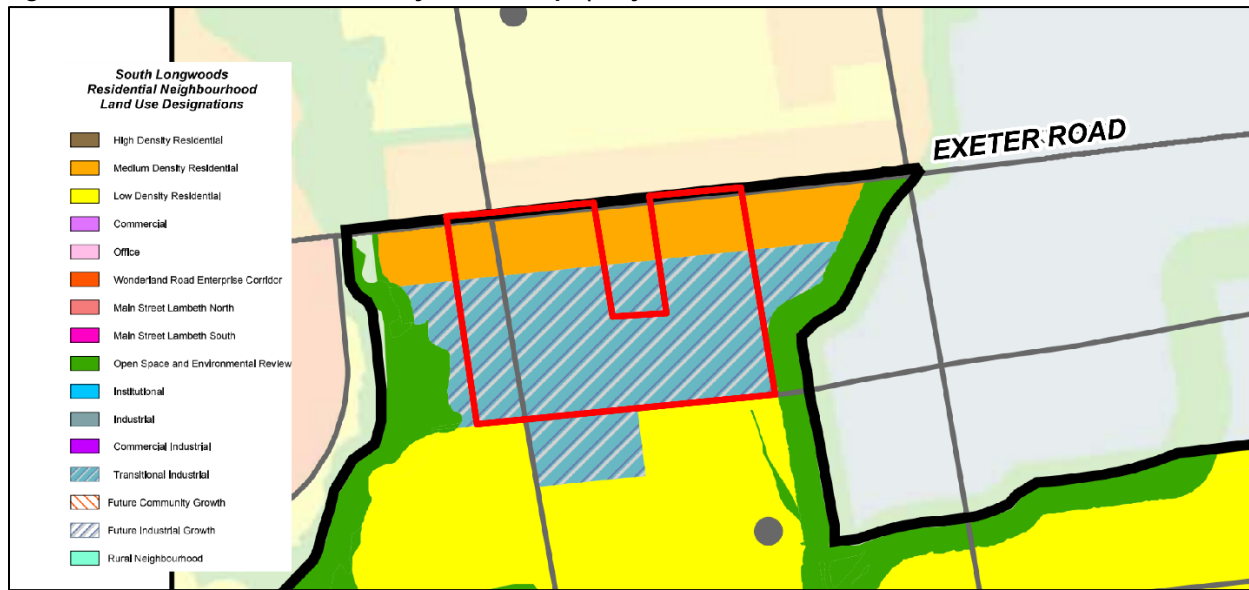
Where there is a need to elaborate on the parent policies of The London Plan, or where it is important to coordinate the development of multiple properties, a secondary plan may be prepared by the City of London. Secondary plans will allow for a comprehensive study of a secondary planning area, considering all of the City Building and Environmental Policies of this Plan. It will also allow for a coordinated planning approach for the secondary planning area and the opportunity to provide more detailed policy guidance for the area, that goes beyond the general policies of the London Plan.

The proposed added uses are consistent with the policies of the Southwest Area Secondary Plan (“SWAP”), which takes precedence over the policies of the *London Plan*. The following section provides a more detailed analysis of how the proposal meets the intent of the SWAP policies.

4.3 SOUTHWEST AREA SECONDARY PLAN, 2014

The Southwest Area Secondary Plan (“SWAP”) is a policy document which forms part of the *London Plan* and is intended to provide more specific policy direction in the southwest part of the City of London. The policies of the SWAP take precedent over the more general policies of the *London Plan* in the event of a conflict. The SWAP establishes a vision, principles and policies to develop the area with mixed-use development and sustainable designs to create a vibrant, liveable community. The subject lands are designated “*Medium Density Residential*” and “*Transitional Industrial*” in the SWAP (Figure 4). Site-specific policies in both designations apply to the subject lands, which are discussed in the following section.

Figure 4 – Southwest Area Secondary Plan Excerpt (subject lands outlined in red)



The intent of the “*Medium Density Residential*” designation is to encourage a mix of housing types and forms at an intensity that is higher than more recent suburban neighbourhoods. This portion of the subject lands recently received a special policy which permits a range of non-residential uses, and is discussed in more detail below.

The intent of the “*Transitional Industrial*” designation is to allow existing uses and properties to develop and evolve for Light Industrial uses, with the long-term intent to achieve a mix of residential uses, as permitted in the “*Medium Density Residential*” designation. Site-specific policies apply to the subject lands which permit limited commercial, and office uses, which do not adversely impact existing light industrial uses within the business park.

The following policy analysis outlines the intent and purpose of the applicable SWAP policies and describes how the proposed additional uses maintain the intent and purpose of the current designation in the Southwest Area Secondary Plan:

Policy 10.1 iv)

In the “Medium Density Residential” designation at 4023-4500 Meadowbrook Drive and 169-207 Exeter Road, limited commercial and office uses, which do not adversely impact existing light industrial uses, may be permitted.

The above-permitted uses meet the intent of the site-specific “Medium Density Residential” policy, as the proposed expansion of permitted commercial and light industrial uses within all parts of the subject lands will not adversely impact existing light industrial uses nor inhibit the eventual long-term redevelopment of the lands.

Policy 10.3 i)

The Transitional Industrial designation is intended to accommodate a potential shift in market demand from industrial to residential uses over the long term, while allowing the existing uses and properties in this area to develop and evolve for Light Industrial uses over the shorter term. The longer-term intent would be to achieve a mix of residential uses as described in the Medium Density Residential section.

The above policy recognizes the changing market demand in this area away from traditionally automobile-oriented, light industrial uses. The proposed zoning amendment seeks to accommodate additional uses to all parts of the subject lands based on the shifting market resulting from new development in the surrounding area.

Currently, the business park is a strong, economically viable area of the City that is facing pressure to adapt in place rather than be redeveloped for residential purposes. The present proposal meets the “Transitional Industrial” designation as it will expand the range of permitted commercial and light industrial uses to all parts of the subject lands within existing buildings in the business park without adversely impacting existing light industrial uses. In essence, the proposal of applying the “LI2” and “LI3” zones to all portions of the subject lands directly implements the policy intent of allowing the evolution of the subject lands for light industrial uses.

As part of a long-term strategy, permission for the wider range of commercial and light industrial uses, compatible with both existing light industrial and future residential uses, will facilitate future phased redevelopment to residential uses. The long-term intent to transition the lands to residential uses may be considered when redevelopment of the business park is proposed. In the interim, allowing consistent commercial and light industrial uses on all parts of the subject lands would allow the existing business park to develop and evolve for a range of compatible uses over the short-term.

Policy 10.3 ii) a)

The primary permitted uses in the “Light Industrial” Place Type of the London Plan shall be limited to light industrial uses that are located within enclosed buildings, require no outdoor storage, and are unlikely to cause adverse effects with respect to such matters as air, odour, water pollution, dust, or excessive vibration and noise levels.

These include such uses as warehousing; research and communication facilities; laboratories; printing establishments; warehouse and wholesale outlets; technical, professional and business services such as architectural, engineering, survey, or business machine companies; commercial recreation establishments; private clubs; private parks; restaurants; hotels and motels; service trades; and contractor's shops that do not involve open storage.

Office uses and retail outlets subject to policy 1140 of the London Plan, which are ancillary to any of the above uses, are also permitted.

The SWAP permitted uses, as listed above, are generally consistent with the uses permitted in the proposed Zoning By-law Amendment, as they allow for the existing property to evolve in place in response to the changing market prior to future redevelopment. The proposed zoning amendment to expand the range of permitted commercial and light industrial uses is compatible with the existing light industrial uses and complementary uses in the evolution of the subject lands. The proposed additional uses will attract a variety of tenants to the business park and will ensure the area continues to be economically viable and diverse before comprehensive redevelopment is undertaken.

Policy 10.3 ii) d)

Where lands are transitioning from industrial to residential use, the permitted uses in the "Medium Density Residential" designation, as set out in Section 10.1, are permitted.

The business park is not proposing a swift transition away from the current industrial uses at this time. Residential uses are premature for the industrial business park as it is a viable and thriving entity. The intent of the proposed amendment seeks to expand the range of compatible uses within the existing buildings to avoid land use conflicts and to achieve a comprehensive transition from industrial to residential use in the future.

Policy 10.3 iv)

In the "Transitional Industrial" designation at 4023-4500 Meadowbrook Drive and 169-207 Exeter Road, limited commercial and office uses, which do not adversely impact existing light industrial uses, may be permitted.

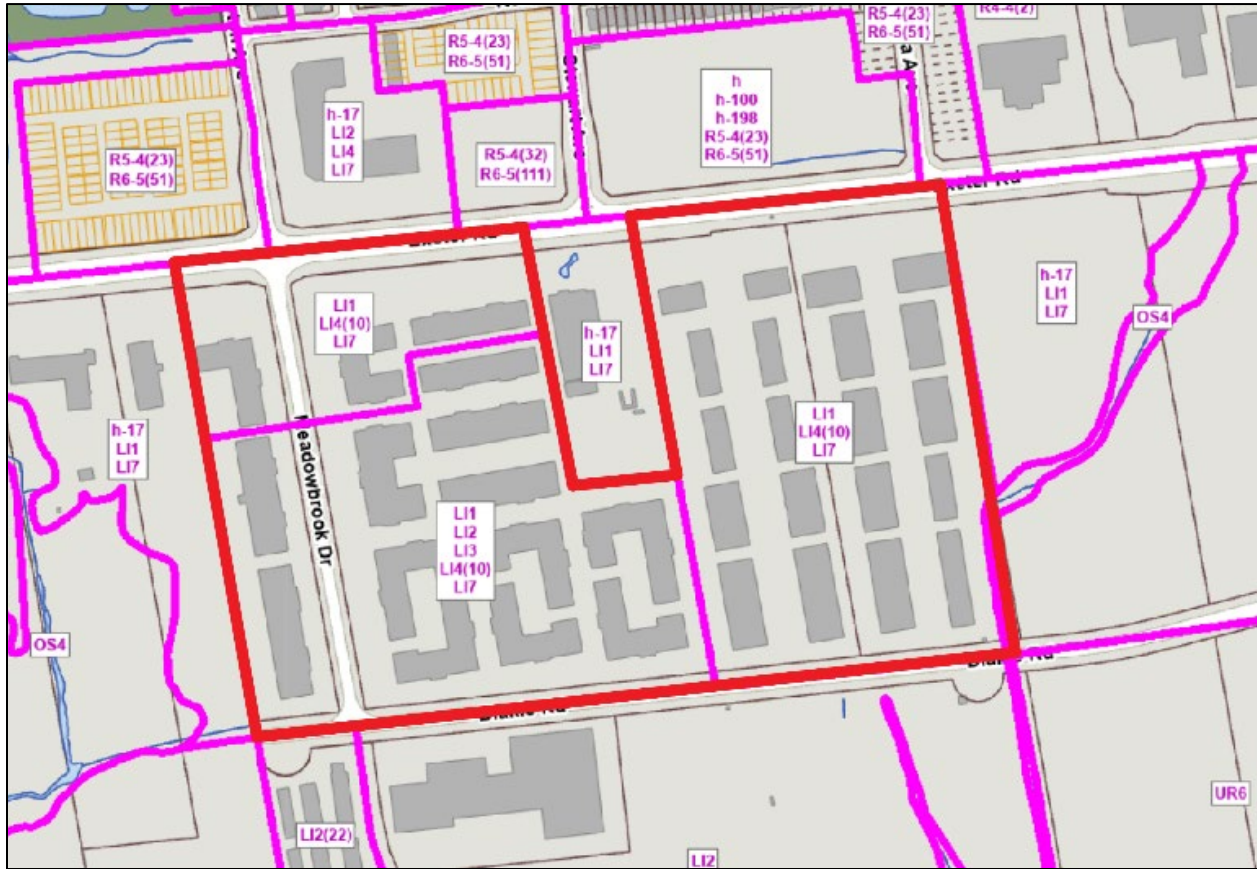
This policy reflects the previously approved intent to permit a broader range of commercial uses on the subject lands, whereas the present proposal is to add the "LI2" and "LI3" uses to the remainder of the subject lands. Therefore the standard policies of the "Transitional Industrial" designation are the appropriate policies that contemplate the enhancement of light industrial uses across the lands.

Based on the above analysis of applicable policies of the Southwest Area Secondary Plan, the proposed amendment is in conformity with the Plan.

4.4 CITY OF LONDON ZONING BY-LAW Z.-1

The subject lands are currently zoned “Light Industrial”, with different variations of the zone applying to different areas: variations 1, 4 and 7 apply to the entire subject lands; and variations 2 and 3 apply to the southwest section (Figure 5).

Figure 5 – Zoning By-law Z.-1 Excerpt (subject lands outlined in red)



The permitted uses in each zone variation applicable to the subject lands are as follows:

L11

- Bakeries;
- Business service establishments;
- Laboratories;
- Manufacturing and assembly industries;
- Offices support;
- Paper and allied products industries excluding pulp and paper and asphalt roofing industries;
- Pharmaceutical and medical product industries;
- Printing, reproduction and data processing industries;
- Research and development establishments;
- Warehouse establishments;
- Wholesale establishments;
- Custom workshop;
- Brewing on premises establishments;
- Service trade;
- Existing self-storage establishments;
- Artisan workshop;

- Craft brewery; and,

- Tow truck business.

LI2

- Any use permitted in the LI1 variation;
- Dry cleaning and laundry plants;
- Food, tobacco and beverage processing industries excluding meat packaging;

- Leather and fur processing excluding tanning;
- Repair and rental establishments;
- Service and repair establishments;
- Service trades; and,
- Textile processing industries.

LI3

- Assembly halls;
- Commercial recreation establishments;
- Day care centres;

- Private clubs; and,
- Private parks.

LI4

- Any use permitted in the LI1 variation;
- Automotive uses, restricted;
- Clinics;
- Convenience service establishments;
- Convenience stores;

- Day care centres;
- Financial institutions;
- Medical/dental offices;
- Personal service establishments; and,
- Restaurants.

LI4(10)

- Any use permitted in the LI4 variation;
- Office, business;
- Office, professional; and,
- Office, service.

LI7

- Automobile body shops;
- Automobile repair garages;
- Building or contracting establishments;
- Repair and rental establishments;
- Service and repair establishments;

- Service trades;
- Truck sales and service establishments;
- Custom workshops; and,
- Tow truck business.

The current zoning of the subject lands permits a range of specific commercial and light industrial uses, however, in order to apply consistent permissions across all parts of the subject lands, a Zoning By-law Amendment (“ZBA”) is required to apply the “Light Industrial (LI2)” and “Light Industrial (LI3)” zones to the portions of the subject lands to which these zones do not already apply. The proposed zoning will extend the permitted light industrial and commercial uses to all parts of the subject lands.

The zone regulations proposed in the “*Light Industrial*” zone are standard. As noted previously, there is no development being proposed along this application, just the rezoning of the subject lands.

Light Industrial (LI2 & LI3) Uses

The proposed re-zoning seeks to facilitate the logical evolution of the existing developed lands in order to expand and achieve consistency in the range of permitted uses for all parts of the subject lands. The proposed uses are transitional in nature and are compatible with future and existing uses. In the proposed “*Light Industrial (LI2)*” and “*Light Industrial (LI3)*” zones, a range of light industrial and commercial uses are permitted, which currently apply to the southwest quadrant of the subject lands. Permitting these light industrial and commercial uses across the entirety of the subject lands will allow for flexibility for the evolving business park to adapt in place, while maintaining the ability to transition away from industrial use in the future as part of a comprehensive redevelopment. The proposed uses are compatible with the changing form of the business park and of the surrounding land uses.

No adverse impacts are anticipated from the expansion of commercial and light industrial uses to the existing buildings within the business park. These uses generate minimal impacts and will utilize the existing loading and refuse collection areas within the existing development. Pedestrian and vehicle traffic may increase during daytime hours as a result of the additional uses; and this increased traffic will benefit adjacent service and retail units within the business park.

Based on the zoning analysis of the proposal and the existing site conditions, the requested “*Light Industrial (LI2)*” and “*Light Industrial (LI3)*” zones are appropriate implementing zones for the proposed additional uses. The requested amendment is consistent with the Provincial Planning Statement 2024, in conformity with both the *London Plan* and the Southwest Area Secondary Plan.

5.0 SUPPORTING SUBMISSION MATERIALS

This Planning Justification Report relies in part on supporting materials, as outlined below.

Sanitary Capacity Brief

A Sanitary Capacity Brief, prepared by Development Engineering Ltd., dated December 14, 2023, was prepared to evaluate the downstream servicing capacity for the subject lands based on the proposed changes in use from the previous OPA/ZBA applications, approved in May 2024. The report assessed the existing sanitary capacity in the context of the existing and proposed additional commercial uses, and confirmed that the Blakie Road sewer, constructed in 2023, allocated design capacity for surrounding developments based on the standard allotment for typical water-using Industrial-Commercial-Institutional (ICI) development within the City of London's Design Specifications and Requirements Manual (DSRM, 2022).

The brief concludes that the existing municipal sanitary sewer system on Blakie Road has been designed with sufficient capacity to accommodate light industrial and commercial space uses. It is further recommended that if a tenant or developer has water demand requirements in excess of 25,000L/ha/day gross area (approximately equivalent to 100 persons/ha equivalent residential population), the development must be supported by a supplementary Sanitary Capacity Analysis.

Since no physical development is taking place on the subject lands at this time, the conclusions of the above-mentioned report remain accurate. Therefore, it can be confirmed that there is satisfactory servicing available for the subject lands.

6.0 CONCLUSIONS

The proposed uses are permitted across portions of the subject lands; however, given the findings of this report it is concluded that the existing development is well-suited to permit the proposed commercial and light industrial uses in all parts of the subject lands. The Zoning By-law Amendment will facilitate appropriate re-use within the existing business park, with expanded land use permissions to allow a range of compatible uses on the subject lands. The proposed amendment is consistent with the Provincial Planning Statement, 2024, in conformity with the *London Plan* and conforms to the Southwest Area Secondary Plan.