

F I N A L
P R O P O S A L
R E P O R T

1944 BRADLEY AVENUE
CITY OF LONDON

JULY 2023
FILE #10574

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1. INTRODUCTION

1.1 LOCATION OF SUBJECT LANDS

Weston Consulting has been retained to provide planning advice and assistance to Bradley Elite Developments Inc, the legally registered owner of the property municipally known as 1944 Bradley Avenue, in the City of London (herein referred to as the “subject lands”). The owner is proposing to develop the subject lands with a residential draft plan of subdivision consisting of 49 single-detached lots, 22 townhouse blocks to allow 144 units and future townhouse condominium block which is anticipated to accommodate 90 back-to-back townhouses. A total of 283 units are proposed. The draft plan of subdivision will also include new local roads that will provide access to the future residential dwellings. New east-west connections are proposed through adjacent lands as well as a new access through the south portion of the lands which are not included as part of the development plan.

This Final Proposal Report is intended to support the enclosed Draft Plan of Subdivision application. The additional supporting materials are submitted in accordance with the Pre-application consultation (PAC) held with planning staff, constituting a complete application as described in Section 34(10) and 51(17) of the *Planning Act*. It is acknowledged that future official plan and zoning by-law amendments are required to implement the proposed plan of subdivision.

The subject property are located along Bradley Avenue, east of Highbury Avenue South in the City of London. The subject lands have an approximate area of 72.11 hectares (104.06 acres), with an approximate frontage of 412.57 metres along Bradley Avenue. The lands are legally described as:

- SOUTH 1/2 LOT 11 CONCESSION 1 AS IN 131297; SUBJECT TO WU53488, 128155LONDON/WESTMINSTER.

The majority of the lands are occupied by an agricultural field and also include a significant woodlot at the northern portion of subject lands. The southeast corner of the subject lands also features a residential dwelling, a barn, and several accessory structures. The subject lands are also bisected by a Hydro corridor which is identified by the dashed red line in Figure 1. The proposed development is limited to lands north of this corridor which is 9.5 ha.



Figure 1: Air Photo

1.2 DESCRIPTION OF PROPOSED DEVELOPMENT

The proposed development envisions 49 single detached residential dwellings, 144 street townhouses and a condominium townhouses; 90 back to back townhouses are anticipated for this block and will be refined through a future planning application. It is expected that a future site plan application will be required for the condo block following approval of Official Plan and Zoning amendments and registration of the draft plan of subdivision.

The proposed development integrates with the existing and planned built-form and neighbourhood characteristics. The subject lands are surrounded by built and draft- approved residential subdivisions to the north, east and west of the subject lands. The landowner has entered preliminary discussions to construct Street 'N' of the adjacent registered plan of subdivision to provide access to Jackson Road. The landowner is also exploring a temporary access south through the Agricultural portion of the lands to Bradley Avenue.

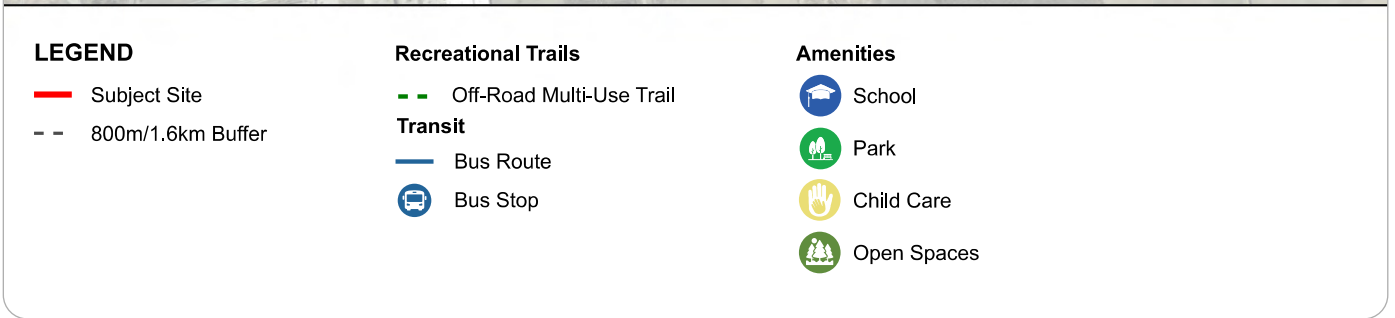
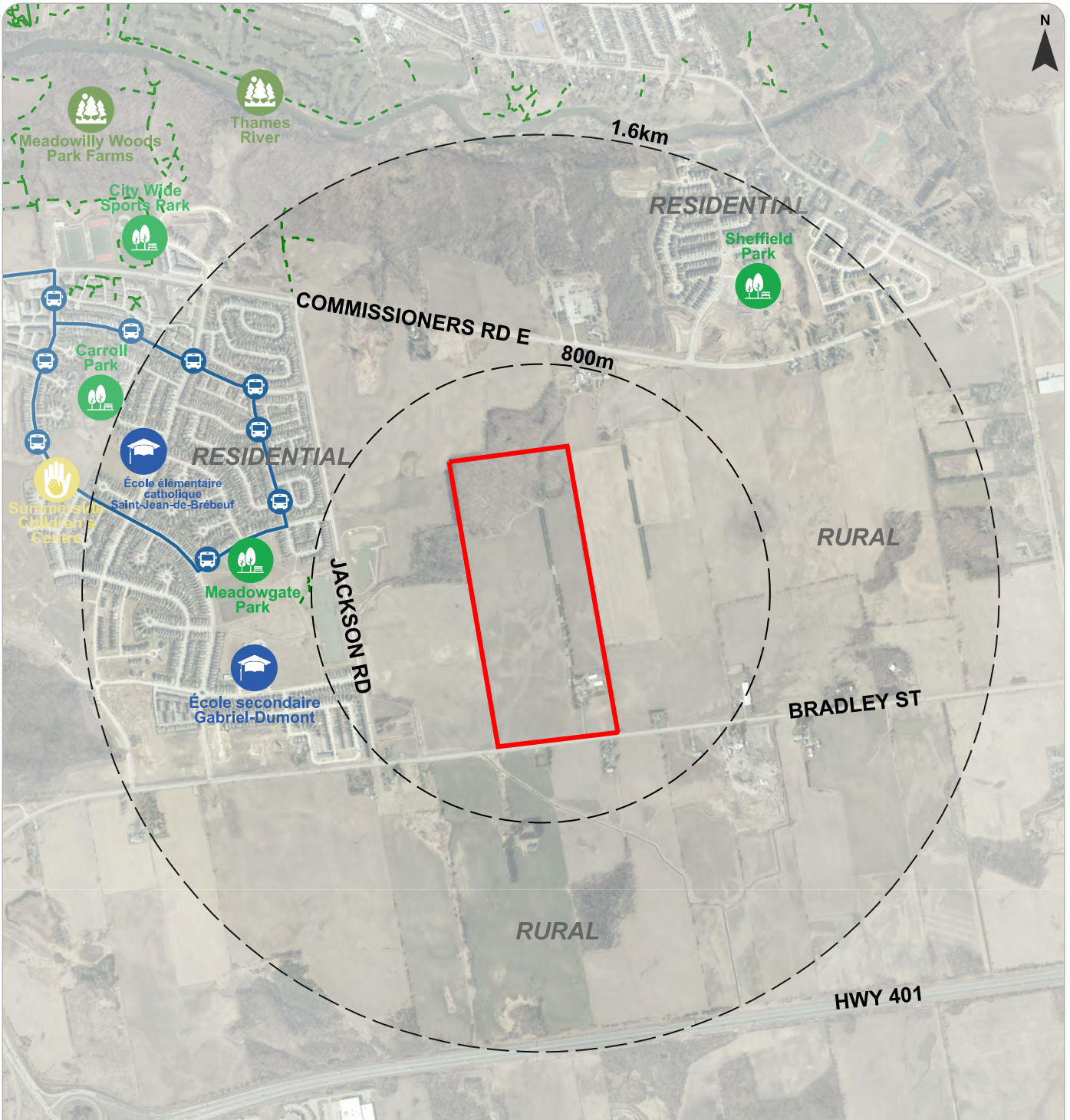


Figure 2: Context Map

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2. PLANNING POLICIES

2.1 PLANNING ACT

The following sections include detailed information regarding the applicable planning policy regime, to determine whether the proposed development is supported by the applicable planning framework and represents good planning. These documents include the Planning Act (as amended 2019), Provincial Policy Statement (2020), Growth Plan (2020), The London Plan (2022) and the City of London Zoning By-law Z-1.

In consideration of the proposed land use planning applications, Section 2 of the *Planning Act* must be considered as it provides the general direction to all land use planning decisions made in the Province of Ontario.

The Planning Act (the Act) is the provincial legislation that governs the ground rules for land use planning in Ontario. It describes how land uses may be controlled, and who may control them.

The act provides for planning processes that are fair by making them open, accessible, timely and efficient. They promote sustainable economic development and a provincial policy framework for a land use planning system. The Act integrates matters of provincial interest into provincial and municipal planning decisions by requiring that all decisions be consistent with the Provincial Policy Statement and conform/not conflict with provincial plans.

Section 2 Provincial Interest

The Minister, the council of a municipality, a local board, a planning board and the Municipal Board, in carrying out their responsibilities under this Act, shall have regard to, among other matters, matters of provincial interest such as:

- a. *the protection of ecological systems, including natural areas, features and functions;*
- c. *the conservation and management of natural resources and the mineral resource base;*
- d. *the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;*
- e. *the supply, efficient use and conservation of energy and water;*
- f. *the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;*
- h. *the orderly development of safe and healthy communities;*

- h. 1. *The accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;*
- j. *the adequate provision of a full range of housing, including affordable housing;*
- k. *the adequate provision of employment opportunities;*
- o. *the protection of public health and safety;*
- p. *the appropriate location of growth and development;*
- q. *the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians.*
- r. *the promotion of built form that,*
 - i. *is well-designed,*
 - ii. *encourages a sense of place,*

The policies and direction of Section 2 of the *Planning Act* inform the Provincial Policy Statement, thereby ensuring that consistency with the PPS equates to consistency with Section 2. The Provincial Policy Statement is given consideration in Section 6.2 of this Report.

Section 34(10) Zoning By-law Amendments

Section 34(10) of the *Planning Act* authorizes Zoning by-law Amendments and regulates the process, specifically consultation, materials required and notice to the public.

Consultation

(10.0.1) The council,

- a. *shall permit applicants to consult with the municipality before submitting applications to amend by-laws passed under this section; and*
- b. *may, by by-law, require applicants to consult with the municipality as described in clause (a). 2006, c. 23, s. 15(3).*

The project team attended a Proposal Review Pre-Consultation meeting with the appropriate City of London staff to discuss the proposed development, as described in Section 4.1 of this Report.

Prescribed Information

(10.1) A person or public body that applies for an amendment to a by-law passed under this section or a predecessor of this section shall provide the prescribed information and material to the council. 1996, c. 4, s.20 (5).

As determined at the Proposal Review Pre-Consultation, the City requested various materials be submitted in support of the rezoning application, those materials have been submitted and are summarized in Section 5 of this Report.

Written and oral submissions

(10.11) Clause (10.10)(a) applies to,

- a. *any written submissions relating to the application that were made to the council before its decision; and v*
- b. *any oral submissions relating to the application that were made at a public meeting. 2015, c. 26, s. 26(3).*

Section 34 (10.11) authorizes members of the public to submit written submissions to Council prior to a decision being made on the application. Members of the public are also able to provide oral comments and/or questions at the statutory public meeting prior to a decision being made.

It is our opinion that the proposed development has appropriate regard to the above provisions of the *Planning Act*.

Section 51(17) Plan of Subdivision Approvals

Section 51(17) of the *Planning Act* mandates the applicant to provide the approval authority with prescribed information and material as required by

the approval authority of a draft plan of the proposed subdivision drawn to scale and showing

- (a) *the boundaries of the land proposed to be subdivided, certified by an Ontario land surveyor;*

Topographical survey enclosed.

- (b) *the locations, widths, and names of the proposed highways within the proposed subdivision and of existing highways on which the proposed subdivision abuts;*

Not applicable however Transportation Impact Assessment enclosed.

- (c) *on a small key plan, on a scale of not less than one centimetre to 100 metres, all of the land adjacent to the proposed subdivision that is owned by the applicant or in which the applicant has an interest, every subdivision adjacent to the proposed subdivision and the relationship of the boundaries of the land to be subdivided to the boundaries of the township lot or other original grant of which the land forms the whole or part;*

Concept Plan enclosed.

- (d) *the purpose for which the proposed lots are to be used;*

Urban Design Brief and Cover Letter enclosed detailing purpose of proposed lots.

- (e) *the existing uses of all adjoining lands;*

Draft Plan of Subdivision enclosed detailing existing uses of all adjoining lands

- (f) *the approximate dimensions and layout of the proposed lots;*

Draft Plan of Subdivision enclosed detailing dimensions and layout of the proposed lots.

- (g) *natural and artificial features such as buildings or other structures or installations, railways, highways, watercourses, drainage ditches, wetlands and wooded areas within or adjacent to the land proposed to be subdivided;*

EIS enclosed detailing the location of natural and artificial features.

- (h) *the availability and nature of domestic water supplies;*

A Hydrogeological Assessment is enclosed and details the available water supplies.

- (i) *the nature and porosity of the soil;*

A Geotechnical Report is enclosed and details the soil conditions of the site.

- (j) *existing contours or elevations as they may be required to determine the grade of the highways and the drainage of the land proposed to be subdivided;*

Topographical survey enclosed

- (k) *the municipal services available or to be available to the land proposed to be subdivided and*

A Functional Servicing Report is enclosed with this submission. The report concluded that the site is serviceable utilizing the future allocated sanitary, storm and watermain infrastructure that will be constructed in Phase 4 of the westerly Parker Jackson Subdivision.

- (l) *the nature and extent of any restrictions affecting the land proposed to be subdivided, including restrictive covenants or easements.*

Refer to enclosed survey

2.2 PROVINCIAL POLICY STATEMENT, 2020

The current version of the Provincial Policy Statement (PPS) came into effect on May 1, 2020 and provides policy direction on matters of provincial interest related to land use planning and development. The PPS aims to promote appropriate development while ensuring that resources of provincial interest, public health and safety, and the quality of the natural environment are protected. All decisions affecting planning matters in Ontario “shall be consistent with” the policy statements issued under the *Planning Act*.

The PPS encourages efficient land use planning and growth management to create and maintain strong communities and a healthy environment while encouraging economic growth over the long term. The PPS also encourages the efficient use of existing infrastructure and public service facilities and requires that municipalities plan for an appropriate range and mix of land uses and built forms throughout the Province. The PPS supports intensification, infill and redevelopment where appropriate in order to promote the efficient use of land where infrastructure and public services

Building Strong Healthy Communities

Section 1.0 of the PPS provides direction related to “Building Strong Healthy Communities” and is applicable to the subject lands. It generally encourages a variety of land uses within communities and encourages initiatives that make efficient use of development by promoting strong, livable, healthy and resilient communities.

Managing and Directing Land Use

Section 1.1.1 contains requirements for managing and directing land use to achieve efficient and resilient development and land use patterns. This Section directs that “*healthy, liveable and safe communities are sustained by:*

- a. *promoting efficient development and land use patterns which sustain the financial wellbeing 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;*
- 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;*
- f. *improving accessibility for persons with disabilities and older persons by addressing land use barriers which restrict their full participation in society;*
- g. *ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;*

The above noted policies in Section 1.1.1 directly apply to the proposed development. These policies encourage development which supports a range of land uses including residential uses, the efficient use of land and accessibility to servicing to meet the projected needs of a community. The proposed development provides 47 single detached dwellings, 146 street townhouses and 90 condo townhouses.

Housing

The PPS encourages a range and mixture of housing types and densities in order to meet the current and projected needs of residents. The following policies are relevant:

Section 1.4.1

To provide for an appropriate range and mix of housing types and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:

- a. Maintain at all times the ability to accommodate residential growth for a minimum of 10 years through residential intensification and redevelopment and, if necessary lands which are designated and available for residential development; and*
- b. Maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned to facilitate residential intensification and redevelopment, and land in draft approved and registered plans.*

Section 1.4.3

Planning authorities shall provide for an appropriate range and mix of housing types and densities to meet projected requirements of current and future residents of the regional market area by:

- 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;*
- d. promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;*

The PPS directs development of new housing towards locations where an appropriate level of infrastructure and public service facilities exist in order to accommodate anticipated residential growth.

The proposed development will assist the City of London by adding an appropriate range and mix of residential units that has access to municipal infrastructure and public facilities. The proposal will contribute 47 single detached dwellings, 146 street townhouses and potentially an additional 90 condo townhouses in an area that predominantly consists of single detached dwellings.

Long-Term Economic Prosperity

Section 1.7 of the PPS includes policies relating to the supporting long-term economic prosperity.

Section 1.7.1

Long-term economic prosperity should be supported by:

- 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;*
- e. encouraging a sense of place, by promoting well-designed built form and cultural planning, and by conserving features that help define character, including built heritage resources and cultural heritage landscapes;*

The proposed development provides for a range of housing options ranging from single detached dwellings, street townhouses and condo townhouses.

Natural Heritage

The Province's long-term prosperity and environmental health depend on conserving biodiversity and protecting natural heritage, water, agricultural, mineral and cultural heritage and archaeological resources for their economic, environmental and social benefits. The following policies are of relevance:

2.1.1 *Natural features and areas shall be protected for the long term.*

2.1.2 *The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.*

2.1.5 *Development and site alteration shall not be permitted in:*

- a. *significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E1;*
- b. *significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)1;*
- c. *significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)1;*
- d. *significant wildlife habitat;*
- e. *significant areas of natural and scientific interest; and*
- f. *coastal wetlands in Ecoregions 5E, 6E and 7E1 that are not subject to policy 2.1.4(b)*

The proposed development includes an Environmental Impact Statement that assesses the natural heritage features within the subject lands. Feature stakings were undertaken with City and Thames River Conservation Authority to establish appropriate buffers and development limit from the existing Significant Woodlands and Wetlands. The proposed development incorporates a 30m buffer to protect the natural heritage feature on the lands. No development is proposed within significant natural features.

Cultural Heritage and Archaeology

The City of London Proposal Review meeting discussed the archaeological potential of the subject lands. It was understood that there was some potential as identified on the Archaeological Management Plan. It was indicated that the proposed draft plan of subdivision would result in soil disturbance due to construction.

The subject lands are also listed on the Register of Cultural Heritage Resources as it features a Georgian Farmhouse dated to 1840. A Heritage Impact Assessment and Archaeological Assessment (Stage 1-2) has been prepared for the entire property. The Heritage Impact Assessment determined that the fields and complex of farm buildings are not historically significant. The Heritage Impact Assessment concluded that the proposed development will not have an adverse impact on adjacent cultural heritage resources.

Summary

The submitted applications facilitate the development of residential uses on lands which are appropriately designated for residential uses. The applications contribute to providing a range of residential units comprised of 47 single detached dwellings, 146 street townhouses and 90 condo townhouses, which will assist long term housing needs.

Based on our review of the applicable policies of the PPS, it is our opinion that the proposed development is consistent with the PPS. The proposal has access to existing infrastructure. The proposal provides for residential intensification and contributes additional residential units in the City of London. Lastly, the proposal respects the natural heritage features by preserving the natural heritage features at the north of the subject lands and providing an adequate buffer. Cultural heritage features were not identified through the Heritage Impact Assessment.

2.3 OFFICIAL PLAN (THE LONDON PLAN)

The London Plan was adopted by City Council on June 23, 2016 and was adopted by the Ministry of Municipal Affairs and Housing on December 28, 2016. The approved London Plan is in-force with respect to the subject lands, and the applicable policies as discussed below. At the time of preparing this report, the most recent version of the document available is the May 2022 consolidation, which has been considered in the context of the proposed development.

The London Plan is a municipal policy document that guides economic, environmental and community building decisions to guide and manage growth. The Plan promotes compact forms of development to address the rising costs of infrastructure and the preservation of prime agricultural areas.

Map 1 – Place Types of the London Plan identifies the subject lands as being located within the Urban Growth Boundary. According to the London Plan, Urban Place Types shall not be permitted outside of the Urban Growth Boundary.

As illustrated by Figure 2, the subject lands are located by streets classified Urban Thoroughfare (Bradley Avenue) and Civic Boulevard (Commissioners Road East and Jackson Road). The London Plan's City Building Policies (Table 6: Street Classification Design Features) identifies the Planned Street Widths for the Urban Thoroughfare (45m) and Civic Boulevard (36m). The Concept Plan envisions the proposed development being serviced by streets classified Neighbourhood Connector. Connections to the proposed development will be made through the Parker Jackson Subdivision.

Managing Growth

The population of London is forecast to grow by more than 77,000 people and 41,000 housing units from 2020 to 2035 (Section 64). The City has developed five frameworks to guide this change through the City Structure Plan (Section 68):

1. The growth framework
2. The green framework
3. The mobility framework
4. The economic framework
5. The community framework

The Growth Framework establishes a plan for shaping growth over the next 20 years. Policies are in place through the Growth Framework to not permit Urban Place Types outside of the Urban Growth Boundary (Section 72). The north parcel of the property is located within the Urban Growth Boundary whereas the south parcel is located outside.

The Green Network indicates the green spaces within London and includes the Natural Heritage System which is to be protected, enhanced and conserved. The Green Framework also includes the City's Subwatersheds, Thames Valley Corridor, and Park System.

The Subwatersheds are identified as areas of lands that collect water and channel it to a specific watercourse. The subject lands are located within the Dingman Creek Subwatershed which is the focus of an ongoing Environmental Assessment (EA) to evaluate stormwater management solutions. The intent of the EA is to help facilitate development in South London for lands within the Urban Growth Boundary. Policies in the plan (Section 115) address Subwatershed Plans as the best method of incorporating an ecosystem approach into land-use planning as they incorporate the human environment, the physical environment, and the living natural environment components.

Natural Heritage areas are identified as lands that will be protected, enhanced, restored and conserved for their long-term sustainability. As per the Initial Proposal Review Meeting and IPR Summary, the subject lands contain natural heritage features which are designated primarily as "Environmental Review" with a portion that is designated as "Open Space".

The Open Space lands on the subject lands are identified as comprised of public and private open space, natural hazard lands, natural heritage and lands containing other natural physical features which are desirable for open space use or preservation in a natural state.

City Design

Section 189 of the Official Plan identifies policies to promote the design of the city shaped by both its natural setting and its built form. Section 193 states that the City in all of its planning and development and its initiatives, 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.

The following policies encourage designs that promote active transportation and pedestrian oriented neighbourhoods:

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.

The following policies encourage a mix and range of housing within the City:

7. A mix of housing types to support aging 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.

The proposed development conforms to these policies by promoting a well-designed built form that is consistent with the City's Design vision by promoting a mix of housing types and a development that supports a positive pedestrian environment. A high-quality, distinctive and memorable image is possible through leveraging the strengths of the adjacent Natural Heritage Systems and by promoting pedestrian connections to these lands from the neighbourhood. A mix of housing types will also be key to the London Plan's goal of providing affordable housing that can support aging in place.

The subject lands are designated as *Neighbourhoods, Green Space and Farmland* as per the policies of the London Plan.

Neighbourhoods

Section 143 of the London Plan provides the following policies to promote the City's Neighbourhood Place Type:

"The Plan identifies neighbourhoods as geographic areas where people live, that are typically bounded by major streets, rail lines, rivers, creeks, natural heritage features, or other major physical features".

The Plan specifies that Neighbourhoods often includes places where people shop, work, worship, go to school and recreate. The proposed development is adjacent to a significant number of lands designated Light Industrial and will provide a strong opportunity for residents to live close to the same places they work at.

Section 789_6. of the London Plan specifies the following policies on the determination of the range of permitted uses for Neighbourhood Place designation types:

"that the intensity of development and range of uses that may be permitted varies, depending upon the street classification that a property fronts onto, in addition to a number of other factor".

The street classification of the proposed development is Neighbourhood Connector. The London Plan currently does not identify Neighbourhood Connectors east of Jackson Road however Street 'N' in the Parker Jackson Subdivision is identified as such in the draft approved plan. Street 'N' will be extended through the proposed development as illustrated on the draft plan of subdivision. The Neighbourhood Connector street designation will allow for the development townhouses in the proposed development.

Green Space

The Green Space Place Type policies of the London Plan promote the preservation of environmentally significant lands. Section 1206 of the London Plan states the following on the Green Space designation:

"Green space and conservation uses will support the retention, enhancement, and conservation of natural heritage features and areas and their ecological functions".

The proposed development strongly promotes these policies by providing strong buffers from the environmentally significant lands on the property. The enclosed Concept Plan indicates the range of these buffers and also indicate enhancements of the natural heritage features through the promotion of pedestrian connections to these features. Conservation of the Green Space designated lands will help strengthen the resiliency of the Dingman Creek Subwatershed. In addition, 30m open space corridor/ pathway has been introduced to connect the proposed development to a planned trail system within the proposed 30m natural herniate buffer. This connector will allow residents to enjoy the environment through passive recreational activities.

Environmental Policies

Section 1319 of the London Plan states the following natural heritage features that could be included in an EIS:

1. Fish Habitat
2. Habitat of Endangered Species and threatened Species
3. Provincially Significant Wetlands and Wetlands
4. Significant Woodlands and Woodlands
5. Significant Valleylands
6. Significant Wildlife Habitat
7. Areas of Natural and Scientific Interest
8. Water Resource Systems
9. Environmentally Significant Areas
10. Upland Corridors
11. Naturalization Areas
12. Other lands as identified through an environmental study

An EIS was prepared for the subject property that speaks to 3. Provincially Significant Wetlands and Wetlands, 4. Significant Woodlands and Woodlands that were identified on, or adjacent to the subject property.

Section 1332 states that "Development and site alteration shall not be permitted in provincially significant wetlands as identified on Map 5 or determined through environmental studies consistent with the Provincial Policy Statement and in conformity with this Plan. Wetlands evaluated using the Ontario Wetland Evaluation System are classified on the basis of scores determined through the evaluation. Wetlands meeting the criteria set forth by the Ministry of Northern Development, Mines, Natural Resources and Forestry shall be confirmed by the Ministry of Northern Development, Mines, Natural Resources and Forestry, and shall be mapped as provincially significant wetlands on Map 5 and included in the Green Space Place Type on Map

1. Wetlands can be identified using Ecological Land Classification. Where a wetland is identified through Ecological Land Classification, the significance of the wetland must be evaluated using the Ontario Wetland Evaluation System".

As outlined in the enclosed EIS, the proposed development includes a 30 metre buffer has been placed from the provincially significant wetlands and there will be no negative impacts on the natural features or their ecological functions.

Section 1342A states that “Development and site alteration shall not be permitted in significant woodlands unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.”

As outlined in the enclosed EIS, the proposed development includes a 30 metre buffer has been placed from the significant woodlands and there will be no negative impacts on the natural features or their ecological functions. The EIS concludes that the Draft Plan of Subdivision is environmentally feasible and would result in negligible negative impacts to the natural heritage features provided that the recommended mitigation measures described in this report are implemented.

Farmland

The Farmland Place Type policies of the London Plan promote the continuation of areas of intense agricultural production and vibrant economic activity. Policies within Section 1179 of the London Plan specify the following:

“The Farmland Place Type is the prime agricultural area of London, and consists of prime agricultural land (Canada Land Inventory Classes 1, 2, and 3 soils) and associated Class 4 through 7 soils that will be protected and maintained for the long term as the base to support a healthy, productive, and innovative agricultural industry as a key component of the city’s economic base and cultural heritage”.

The Farmland designation applies to the lands south of the hydro corridor outside of the City’s Urban Boundary. This application does not seek to alter this designation for that portion of the subject lands. The proposed development envisions continuation of the lands for their agricultural uses.

The proposed development at 1944 Bradley Avenue considers the Place Type and Key Direction policies and is in conformity with the policies of the Plan and consistent with the Provincial Policy Statement. They reflect patterns of development and a mix of housing types that will better use London’s natural and financial resources so as to create sustainable forms of development within London’s neighbourhoods.

2.4 ZONING BY-LAW (CITY OF LONDON, ZONING BY-LAW Z.-1)

The subject lands are zoned as Agricultural (AG-1) Zone. The AG-1 Zone is intended to be applied to agricultural and farmland areas. The AG1 Zone permits a range of non-intensive agricultural uses. These subject lands are to be rezoned through a future Zoning By-law Amendment application. The subject lands are intended to be rezoned as R6-5 Zone with site specific development standards and will permit the following uses: Street Townhouse, Condo Townhouse and Single Dwelling.

The future Zoning By-law Amendment application will provide rationale for the R6 Zone and development permissions related to number of dwelling units, height, storeys, parking spaces, minimum landscaped open space, maximum density (uph), lot area, lot frontage, lot coverage, front yard depth, exterior side yard depth, rear yard depth and interior side yard depth.

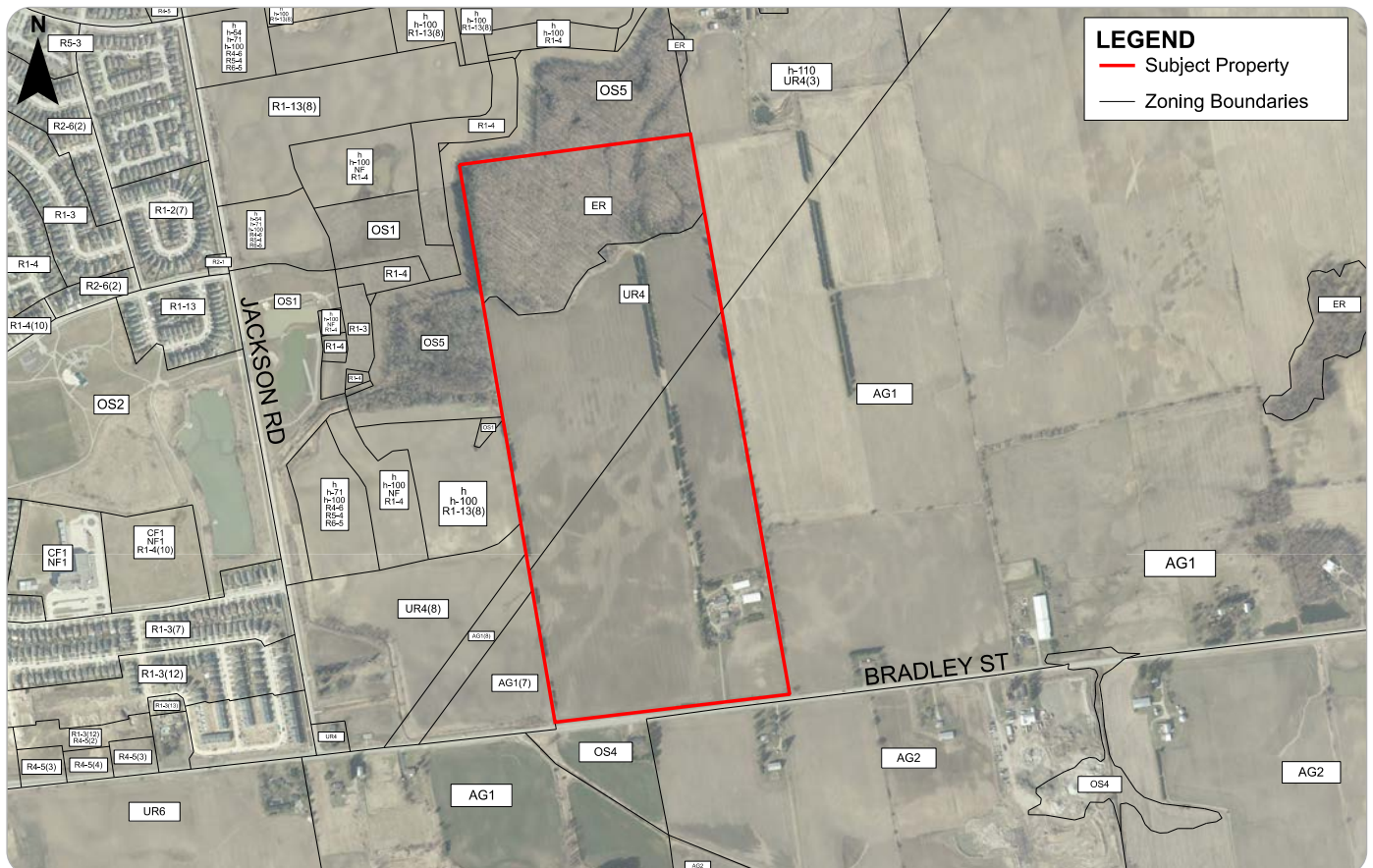


Figure 4: Zoning

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3. EXISTING CONDITIONS

3.1 ARCHAEOLOGICAL/ BUILT HERITAGE CONCERNS

The enclosed Preliminary Environmental Impact Study (EIS) was prepared by Palmer dated July 24, 2023. The purpose of the EIS is to inventory and evaluate the sensitivity of the existing natural heritage features and ecological functions associated with the subject lands. The purpose of the EIS is also to assess the impacts of the proposed development. The EIS proposes avoidance and mitigation measures where appropriate for natural heritage features requiring protection. The EIS evaluates the following: Physiography and Soils, Vegetation Communities, Flora, Aquatic Habitat, Breeding Amphibians and Incidental Wildlife. Palmer Environmental is the Consulting Ecologist and met with City and Conservation Authority staff on July 5, 2023 to further delineate the dripline of the woodlot. This limit will be incorporated into the draft plan of subdivision.

A Stage 1 Archaeological Assessment was prepared by Earthworks Archaeological Services Inc. dated October 6, 2022. The assessment was conducted as part of the requirement defined in Section 616 of *The London Plan*, which requires an archaeological assessment where a proposal involves development or site alteration, and if it is determined through the application of the *Archaeological Management Plan* model that any part of a subject area possesses archaeological resource potential or known archaeological resources.

Evaluation criteria that indicate archaeological potential include the following:

- Location of the study area within 300 metres
- Location of the study area within 300 metres of four registered archaeological sites
- Location of the study area at the boundary of Bradley Avenue, a historically mapped transportation route
- Location of the study area within an area of archaeological potential as documented in the City of London *Archaeological Master Plan*
- The property (Rae farmhouse) is listed on the City of London *Register of Cultural Heritage Resources*

As a result of the identification of these features Earthworks has determined that the study area contains archaeological potential and a Stage 2 archaeological assessment is recommended and forthcoming. Based on email correspondence enclosed from Michael Greguol it is understood that the City a Stage 2 archaeological assessment can be received separately and is not required to be submitted at this time.

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4. SUBDIVISION DESIGN

As depicted in the Draft Plan of Subdivision prepared by Weston Consulting, the design for the proposed development includes residential units ranging from single detached dwellings, street townhouses and future back-to-back townhouses. The complete breakdown in the number of units with the total area is provided in the table below.

It is important to note that Block 73 as illustrated on the draft plan of subdivision is intended to accommodate 90 back to back townhouses. The submitted supporting studies reflect this planned unit mix, however it is understood that this block will undergo a future site plan application for detailed design.

In addition to the proposed lotting pattern proposed on the draft plan of subdivision, new 23m. public roads are proposed to service this development. Street 'C' is intended to be an extension of Street 'N' which is part of the adjacent draft approved plan of subdivision. The Applicant is in discussions with the neighbour to make appropriate arrangement for the construction of Street 'N' to obtain access to Jackson Road. To provide a secondary access to this development, Street 'A' is proposed to extend south to Bradley Ave. No development is proposed with the agricultural lands south of the hydro corridor.

The proposed development will also seek to protect the natural heritage features at the north end of the subject lands. As noted earlier in this report, a 30m protective buffer is proposed to protect the features from the planned residential development. A new trail is proposed through this buffer to provide connections to the existing trail network. The EIS states that some discussions and options for trail placement is included.

Table 1: Subdivision table

Location	Number of Units	Area
Single Detached	49	2.246ha
Street Townhouse	144	2.748ha
Future Back-to-Back Townhouse (condo)	90	1.862ha
Total	283	6.856 ha



Figure 5: Site Plan of Subdivision

4.1 EXISTING SERVICES

Existing servicing infrastructure will be provided through the west of the subject lands, along Jackson Road and the adjacent Phase 4 of the Parker Jackson Subdivision (39T-06507). Enclosed with this development application is a Functional Servicing Report which outlines the proposed development scheme. Primary service connections are proposed through Street 'C' which will extend through the adjacent lands via Street 'N'. The watermain will be looped north through the proposed 30m buffer and connect back into the proposed development to west via Street 'L'.

4.2 SUBDIVISION PHASING/ STAGING

As depicted in the Draft Plan of Subdivision drawing, the development is anticipated to occur in one phase for the entire northern portion. Future development of the southern portion will be explored at the time when the lands are brought into the urban boundary. Phase 2 has not been considered within the submitted supporting studies.

4.3 URBAN DESIGN

A scoped Urban Design Brief (UDB) was prepared by Weston Consulting dated April 2023. The UDB provided design rationale for the proposed development of the subject lands and was prepared in support of a Draft Plan of Subdivision.

The Urban Design Brief responds to the City's request to follow the design guidelines described in the sections "Urban Design Briefs for Subdivisions" and "Vision and Analysis". The Brief describes conformity of the proposed development with the London Plan as well as the City's Urban Design Brief Terms of Reference.

As requested by City staff, a detailed conceptual design of future condominium back to back townhouse block has been provided to illustrate the potential configuration. This design will be further refined as part of a future site plan application.

The Urban Design Brief indicates that the proposed development supports the policies of the London Plan and the relevant urban design policies of the draft City-Wide Design guidelines. The proposed development adheres to key policy direction through a strategically located residential subdivision that is in-line with nearby low-rise residential developments while protecting green space within the immediate vicinity.

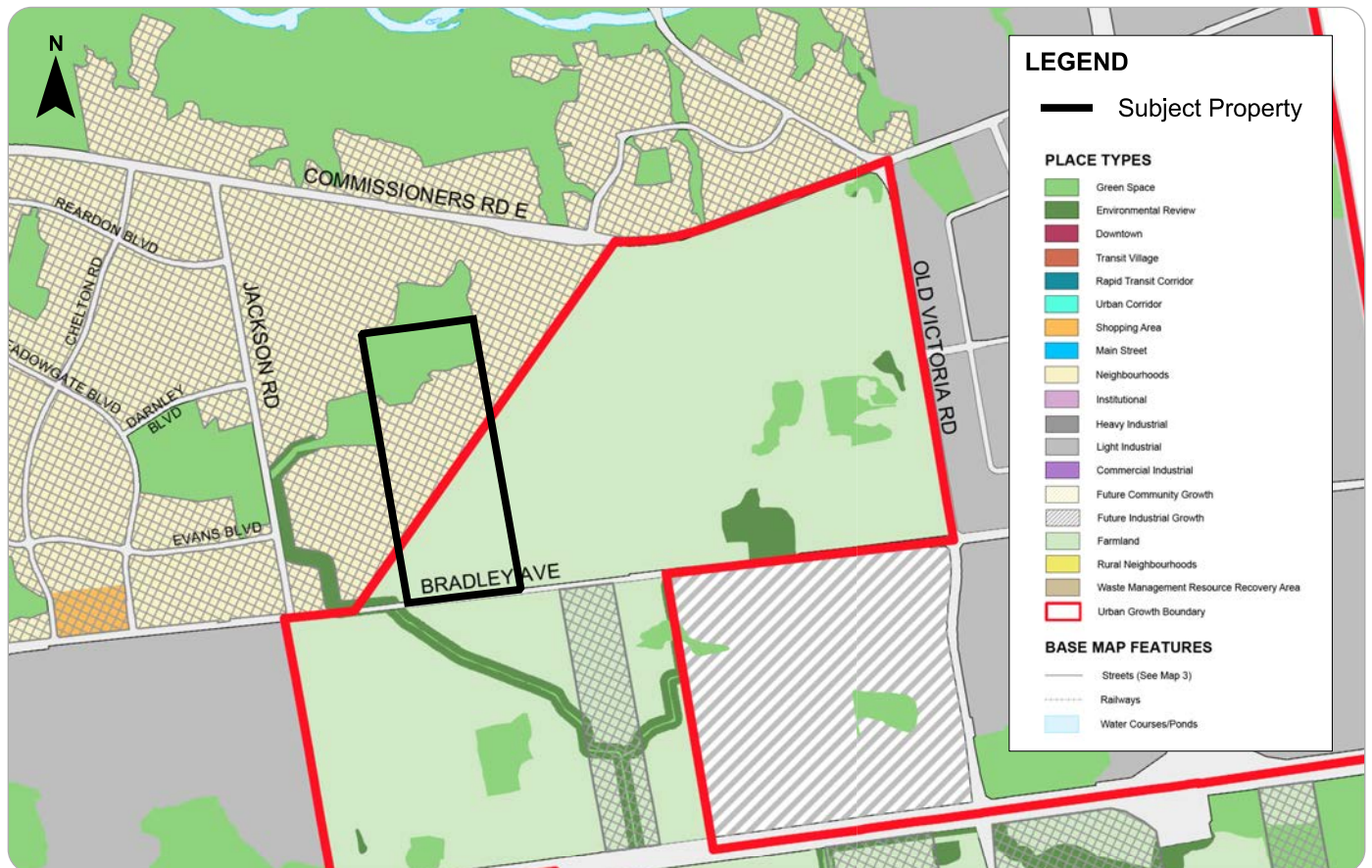


Figure 6: Place Types

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5. STORMWATER MANAGEMENT (SWM)

5.1 SANITARY SERVICING

A Functional Servicing and Stormwater Management Report was prepared by Odan-Detech Consulting Engineers dated March 15, 2023. The report evaluated the serviceability of the subject lands with respect to sanitary, water and stormwater services and also conceptual grading of the proposed development. The SWM report indicates that the subject lands are serviceable utilizing the future allocated sanitary, storm and watermain infrastructure that will be constructed in the Phase 4 of the westerly Parker Jackson subdivision.

The report notes that the proposed development will have an outlet for sanitary services based on the projected allocation and the construction of the downstream sanitary sewer on the neighbouring lands. The report indicates a peak sanitary flow from the proposed development totalling 9.12 L/s. The total generated expected sanitary flow and population from the subject lands is less than the allocated values assigned to the allocated sanitary sewer downstream within the future Phase 4 of the Parker Jackson Subdivision. No changes to the existing downstream design is required.

All sanitary sewers within the development will be sized at 250mm diameter which is the minimum City of London standard.

5.2 WATER SERVICING

The water servicing for the subject lands will be provided by connecting to the future 300mm watermain which will be stubbed to the site at the connecting Street 'N' /Evans Blvd.

Looping of municipal watermains through the site back to future Street 'L' /Lyndsay Street through the proposed connector green spaces along the north and west boundary is proposed to maintain pressure and flows to the site and will also provide a secondary water source in case of temporary shut downs of watermains within the subject lands. A WaterCAD model completed by Development Engineers for the proposed neighbouring Parker Jackson Subdivision (dated August 1, 2021) included conceptual modeling for the subject site with consideration for looping to the 600mm watermain on Commissioners Road to the north of the 600mm watermain on Bradley Avenue to the south. The loop to Street L has been proposed however due to the distance to complete these connections. Further analysis of the looping requirements will be completed to confirm available flows within the proposed development.

5.3 STORMWATER SERVICING

The existing site is located within the Dingman Creek catchment area and drains towards the Thames River through the Hampton-Scott Municipal Drain. The area of development within the subject lands has been allocated to the Parker Stormwater Management Facility located to the westward, on the east side of Jackson Street between Darnley Blvd and Evans Blvd within the Parker Jackson Subdivision. The constructed pond provides quantity and quality control for 78.1 ha of land which includes the proposed subdivision.

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6. PLANNING ANALYSIS AND JUSTIFICATION

6.1 TRANSPORTATION IMPACT ASSESSMENT

A Transportation Impact Assessment was prepared by Paradigm Transportation Solutions Limited dated January 2023. The TIA included an analysis of existing traffic conditions, traffic forecasts for five years from the date of development completion (2029), and assessment of traffic impacts with recommendations to accommodate the proposed development as appropriate.

The TIA utilized the following study area intersections:

- Bradley Avenue and Jackson Road
- Jackson Road and Evans Boulevard/ Proposed Road; and
- Bradley Avenue and proposed Road Connection

The TIA determined that the existing traffic conditions are operating at acceptable levels of service. The development is forecast to generate 154 and 187 trips during the AM and PM peak hours. All study area intersections are forecast to operate at acceptable levels of service in 2029. Both site access intersections are forecast to operate at acceptable levels of service under 2029 total traffic conditions. An eastbound left-turn lane with 25 metres of storage is forecast to be warranted on Bradley Avenue at the new road connection under 2029 total traffic conditions.

The TIA recommends that the development be considered for approval as proposed, with an eastbound left-turn lane with 25 metres of storage constructed on Bradley Avenue at the new road connection. The TIA also recommends the provision of sidewalks on both sides of all internal roadways and connections to sidewalks in the adjacent Parker Jackson subdivision. Bike lanes are not currently provided in vicinity of the development however a designated facility is planned for Bradley Avenue and an Off-Road Secondary Route is planned north of the subject lands.

6.2 INTERNAL ROAD NETWORKS

Internal Road Networks for the proposed development of the subject lands are indicated on the Draft Plan of Subdivision. A proposed road connection from the Parker Jackson subdivision to the west has been identified as Street 'C'. Two further streets are proposed for the subdivision which are identified as 'Street A' and 'Street B'. The proposed Street 'B' will provide a further potential road connection to the lands to the east as indicated on the Draft Plan of Subdivision.

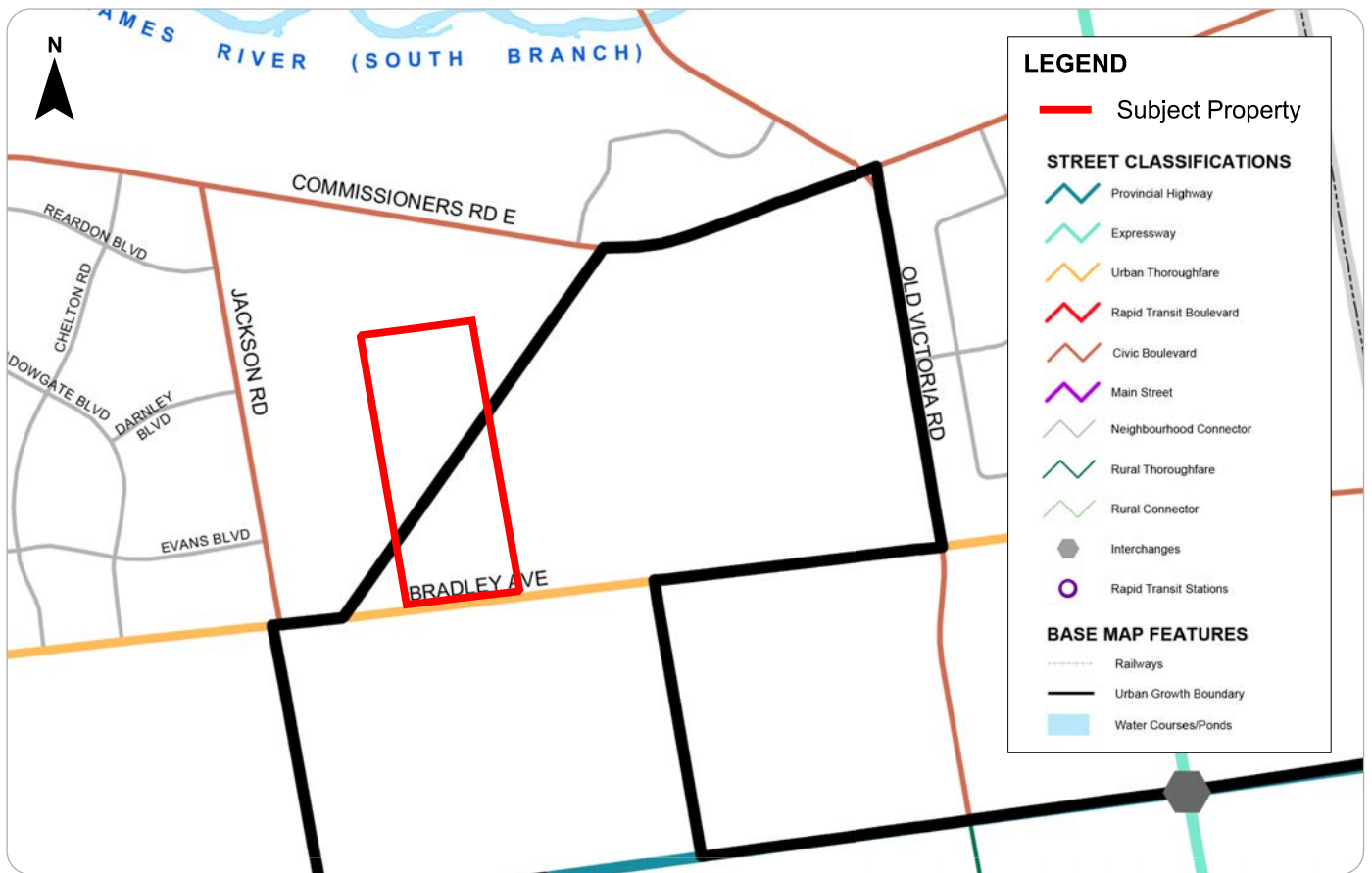


Figure 7: Street Classifications

6.3 FOCUSED ENVIRONMENTAL IMPACT STUDY

A Focused Environmental Impact Study was prepared by Palmer to inventory and evaluate the sensitivity of the existing natural heritage features and ecological functions associated with the subject property and assess the impacts of the proposed development. As per the enclosed correspondence with Margot Ursic, it was understood that only a Focused EIS would only be required to be submitted. The Focused EIS concluded that the proposed Draft Plan of Subdivision is environmentally feasible and would result in negligible negative impacts to the natural heritage features provided that the recommended mitigation measures described in this report are implemented.

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