

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

MARCH 2024
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 a residential subdivision including 47 single detached dwellings, 134 street townhouse units, and a future townhouse condominium block. A Draft Plan of Subdivision application was submitted to the City of London on July 26, 2023 with draft approval conditions and a red-lined plan was received from staff in February, 2024. This Final Proposal Report (FPR) is provided as an update to the FPR submitted with the Draft Plan of Subdivision in support of a Rezoning application. This application and supporting materials are submitted in accordance with the Proposal Review meeting (IPR) held with planning staff on February 21, 2024, constituting a complete application as described in Section 34(10) and 51(17) of the *Planning Act*.

We note that a City initiated Official Plan Amendment is also required to implement the road framework on the subject lands. While this is not part of this application, it's our understanding that Staff will be bringing forward this application to City Council in conjunction with this Zoning By-law application.

The purpose of this letter is to outline and evaluate the proposed development in the context of the applicable Planning policy framework. A review of the Planning Act (2019), Provincial Policy Statement ('PPS') (2020), the London Plan (2022), the City's Zoning By-Law Z.-1, and other relevant policies relating to the subject lands has been conducted. This report provides analysis and justification for this development in accordance with good planning principles and a basis for the advancement of the planning applications through the planning process.

The subject lands 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.

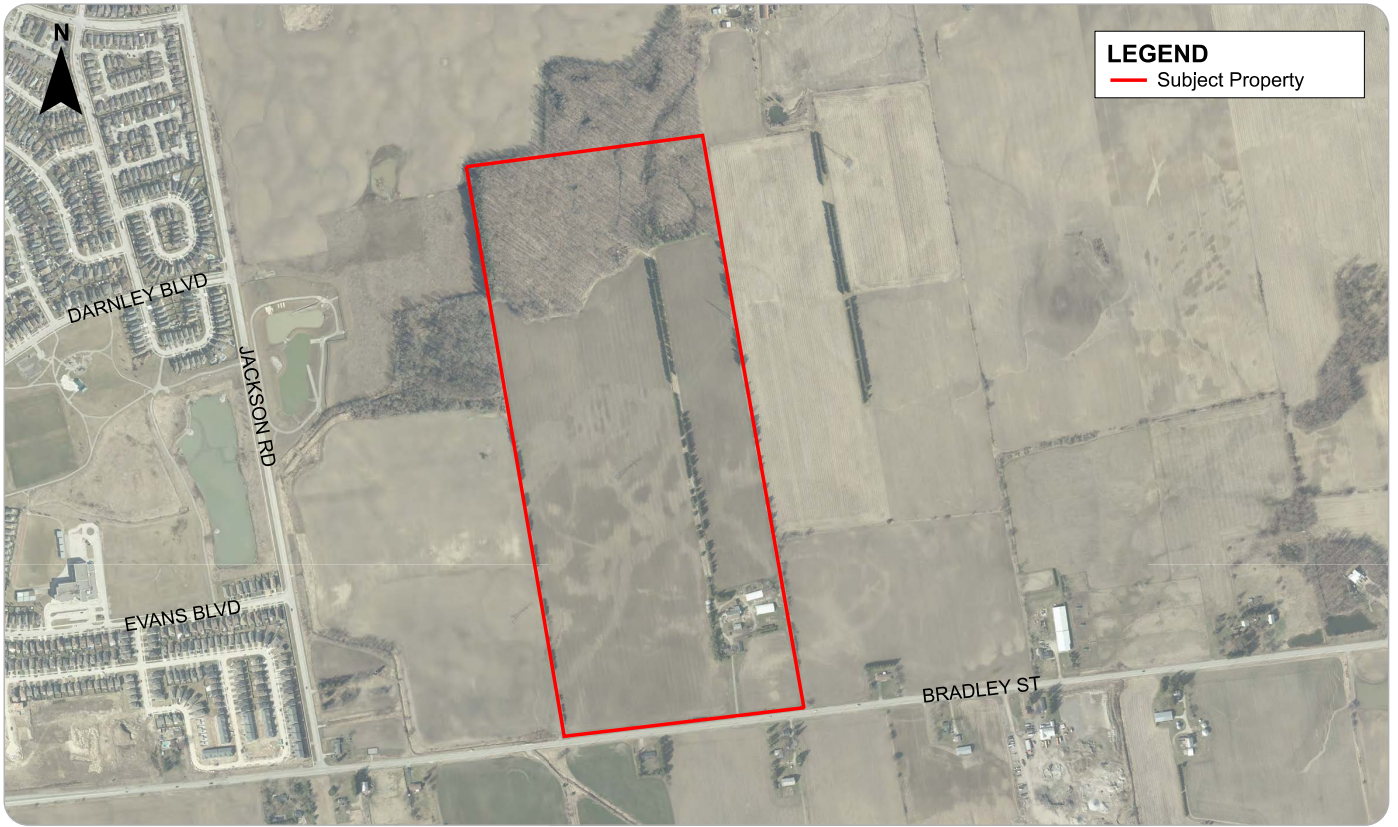


Figure 1: Aerial Photo

1.2 DESCRIPTION OF PROPOSED DEVELOPMENT

The proposed development contemplates 47 single detached residential dwellings and 134 street townhouses. A development will also be created through the subdivision that is intended to accommodate approximately 90 condominium townhouses; it should be noted that the design and number of units of this block will be determined through a future Site Plan Control application following registration of the subdivision. The proposed development integrates with the surrounding neighbourhood characteristics as it ties in to approved neighbouring subdivisions of similar built forms.

The Applicant has entered into preliminary discussions with the adjacent developer to construct Street 'C' and 'D' of the adjacent registered plan of subdivision to provide access to Jackson Road to the west. The Applicant will also provide a temporary turning circle on the eastern edge of the Neighbourhood Connector Street 'B' as requested by the Draft Plan of Subdivision conditions process. At the appropriate time this road will connect eastward to a potential subdivision to the east of the site.

We note that this is Phase 1 of a larger development. This application seeks to develop the lands within found within the urban boundary and north of the hydro corridor bisecting the property. The areas outside of the urban boundary to the south are intended to be redevelopment in the future.



Figure 2: Draft Plan of Subdivision

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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 of features of significant architectural, cultural, historical, archaeological or scientific interest;*
- d. *the supply, efficient use and conservation of energy and water;*
- e. *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;*

2.2 PROVINCIAL POLICY STATEMENT, 2020

- j. *the adequate provision of a full range of housing, including affordable housing;*
- 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,*
 - iii. *provides for public spaces that are of high quality, safe, accessible, attractive and vibrant,*

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

This application is supported by plans and reports as outlined in the informal Pre-Consultation Application Meeting held with planning staff in February, 2024 and constitutes a complete application under Section 34(10) of the *Planning Act*.

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

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, 134 street townhouses and potentially an additional amount of condo units in the condo block in an area that predominantly consists of single detached dwellings.

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 valley lands 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 application includes an Environmental Impact Statement (the EIS) 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 an approximate 30m buffer to protect the natural heritage feature on the lands. No development is proposed within significant natural features themselves. As part of the Subdivision application, the EIS was generally accepted with condition of approval to address refinements to the report.

Cultural Heritage and Archaeology

Section 2.6 of the PPS sets the policy for protecting cultural heritage and archeological features throughout the development process. The following policies apply to the subject lands:

2.6.1. Significant built heritage resources and significant cultural heritage landscapes shall be conserved.

The subject lands are listed on the Register of Cultural Heritage Resources as they feature 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. The Stage 1-2 Archaeology Report has been filed with the Ministry of Tourism, Culture and Sport, and an expedited review has been requested.

2.6.2. Development and site alteration shall not be permitted on lands containing archaeological resources or areas of archaeological potential unless significant archaeological resources have been conserved.

The City of London Proposal Review meeting (IPR) for the Draft Plan discussed the archaeological potential of the subject lands as identified in the City's Archaeological Management Plan, and that the proposed draft plan of subdivision would result in soil disturbance due to construction. Since this time, a Stage 1 and Subsequent Stage 2 Assessment have been completed. The findings from said report are that the study area contains 10 archaeological sites of no further cultural heritage value and interest and no additional archaeological assessments are recommended for the sites or for the surveyed area. This report, prepared by Earthworks Archaeological Services Inc, dated January 30th, 2024, has been filed with the Ministry. Further an expedited review request form has been filed with the Ministry to better align with the development timelines.

It should be noted that Engineering Draft Plan condition #36 requires the Ministry of the Environment to provide clearance on the proposed ultimate storm/ drainage and SWM servicing works for the northerly portion of the subject lands. This confirmation will be provided at the appropriate time when available.

Summary

The submitted application facilitates 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, 134 street townhouses and 90 condominium townhouses, which will assist with the Province's 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 of 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. Within the Urban Growth Boundary, the subject lands are designated *Neighbourhoods* and *Green Space* as further described below. 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.

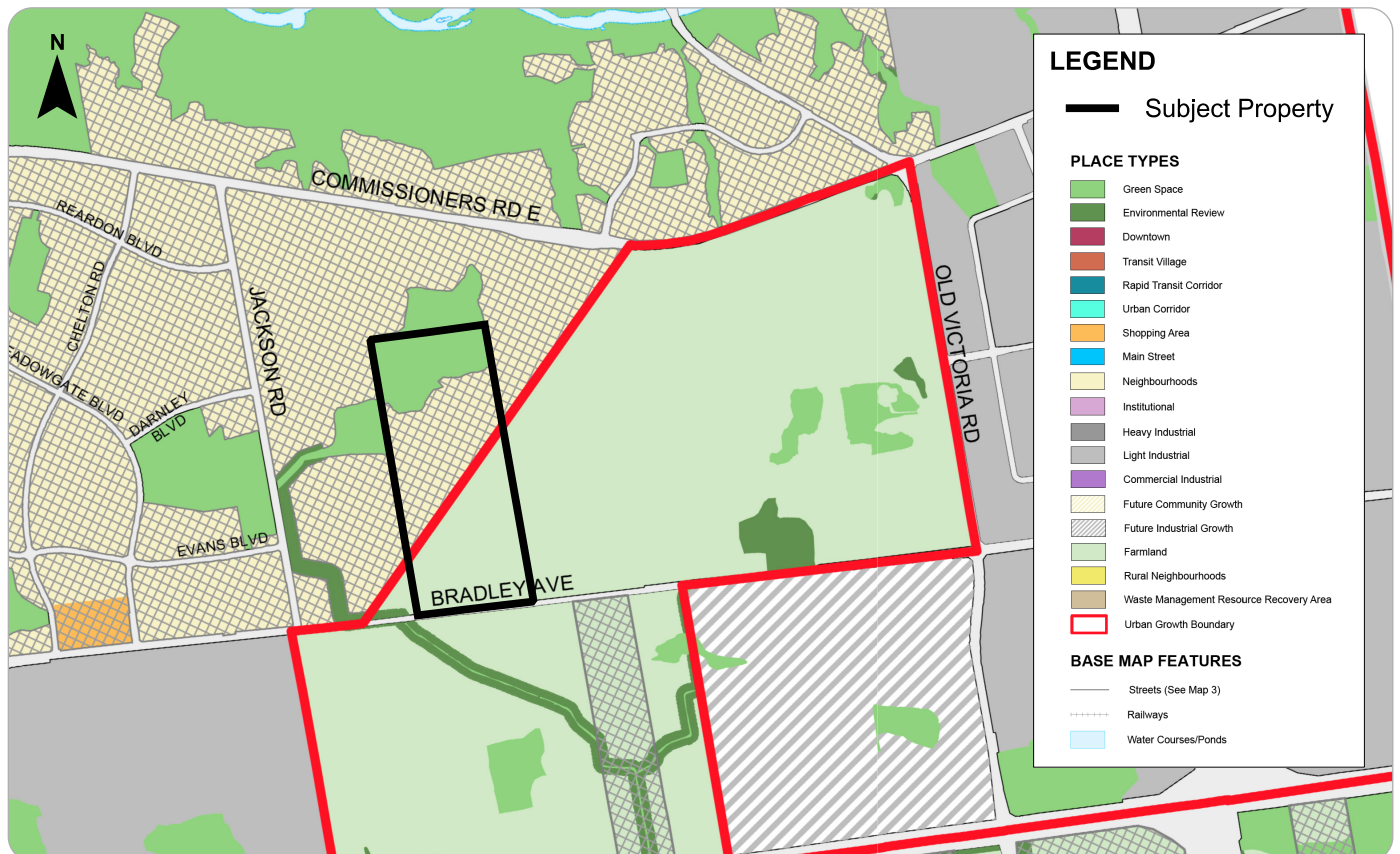


Figure 3: Map 1 – Place Types

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 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

The London Plan characterizes the Neighbourhoods place type 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”.

Section 916 of The London Plan identifies key elements of the vision associated with the Neighbourhoods Place type. The following elements are relevant to the proposed development:

- A strong neighbourhood character, sense of place and identity.
- Well-connected neighbourhoods, from place to place within the neighbourhood and to other locations in the city such as the downtown.

- Parks, pathways, and recreational opportunities that strengthen community identity and serve as connectors and gathering places.

The proposed residential subdivision provides a mix of housing options that are planned in a way that can be considered logical based on the surrounding development and associated built form. The parkette being proposed represents a gathering place within the neighbourhood and the proposed connections/pathways will help strengthen community identity as per the objectives of the Neighbourhoods place type.

The permitted range of uses and intensity allowances are based on the classification of street onto which the property has frontage, as per Section 919.2 of the London Plan. The subject lands have frontage along Jackson Road, which is classified as a Neighbourhood Connector (Figure 3).

As per the policies of Table 10, the following primary permitted uses apply to properties designated *Neighbourhoods* that have frontage along a street classified as a Neighbourhood Connector outside of Central London: *single detached; demi-detached; duplex; converted dwellings; townhouses; additional residential units; home occupations; group homes; triplexes; and small-scale community facilities*. The proposed development is consistent with these built forms.

Table 1: Table 10 Range of Permitted Uses in Neighbourhoods Place Type

Street onto which the property has frontage	Range of primary permitted uses	Range of secondary permitted uses conditional on classification of intersecting street				Range of secondary permitted uses
		Intersects with Neighbourhood Street	Intersects with Neighbourhood Connector	Intersects with Civic Boulevard	Intersects with Urban Thoroughfare	Fronting onto Park
Neighbourhood Street	<ul style="list-style-type: none"> • Single detached • Semi-detached • Duplex • Converted dwellings • Townhouses • Additional residential units • Home occupations • Group homes 	N/A	N/A	N/A	N/A	N/A
Neighbourhood Connector	<p>As per Neighbourhood Street plus:</p> <ul style="list-style-type: none"> • Triplexes • Small-scale community facilities <p>Only in Central London:</p> <ul style="list-style-type: none"> • Fourplexes • Stacked townhouses • Low-rise apartments 	N/A	<p>Secondary Uses:</p> <ul style="list-style-type: none"> • Mixed-use buildings • Fourplexes • Stacked townhouses • Low-rise apartments 	<p>Secondary Uses:</p> <ul style="list-style-type: none"> • Mixed-use buildings • Fourplexes • Stacked townhouses • Low-rise apartments 	<p>Secondary Uses:</p> <ul style="list-style-type: none"> • Mixed-use buildings • Fourplexes • Stacked townhouses • Low-rise apartments 	<p>Secondary Uses:</p> <ul style="list-style-type: none"> • Mixed-use buildings • Fourplexes • Stacked townhouses • Low-rise apartments
Civic Boulevard and Urban Thoroughfare	<p>As per Neighbourhood Connector plus:</p> <ul style="list-style-type: none"> • Stacked townhouses • Fourplexes • Low-rise apartments • Emergency care establishments • Rooming houses • Supervised correctional residences 	N/A	<p>Secondary Uses:</p> <ul style="list-style-type: none"> • Mixed-use buildings 	<p>Secondary Uses:</p> <ul style="list-style-type: none"> • Mixed-use buildings • Stand-alone retail, service, office 	<p>Secondary Uses:</p> <ul style="list-style-type: none"> • Mixed-use buildings • Stand-alone retail, service, office 	N/A

Properties designated *Neighbourhoods* that have frontage along a street classified as a Neighbourhood Connector outside of Central London must conform to a maximum height of 3 storeys.

The street classification of Street 'C', Street 'A', and the portion of Street 'B' east of the intersection of Street 'A' and 'B' within the proposed development is being proposed as 'Neighbourhood Connector' and meets the required design standards. 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.

Street 'D' and the smaller Western remaining portion of Street 'B' is being proposed with a smaller tapered 20m ROW and reduced radii as per Engineering Standards. A Redlined Draft Plan of Subdivision is currently being discussed with City Staff outside of this application.

A City-initiated OPA is underway to apply the Neighbourhood Connector street classification on Map 3 of The London Plan to the designated streets in the subdivision draft plan, which is required in order to justify implementing the proposed zoning.

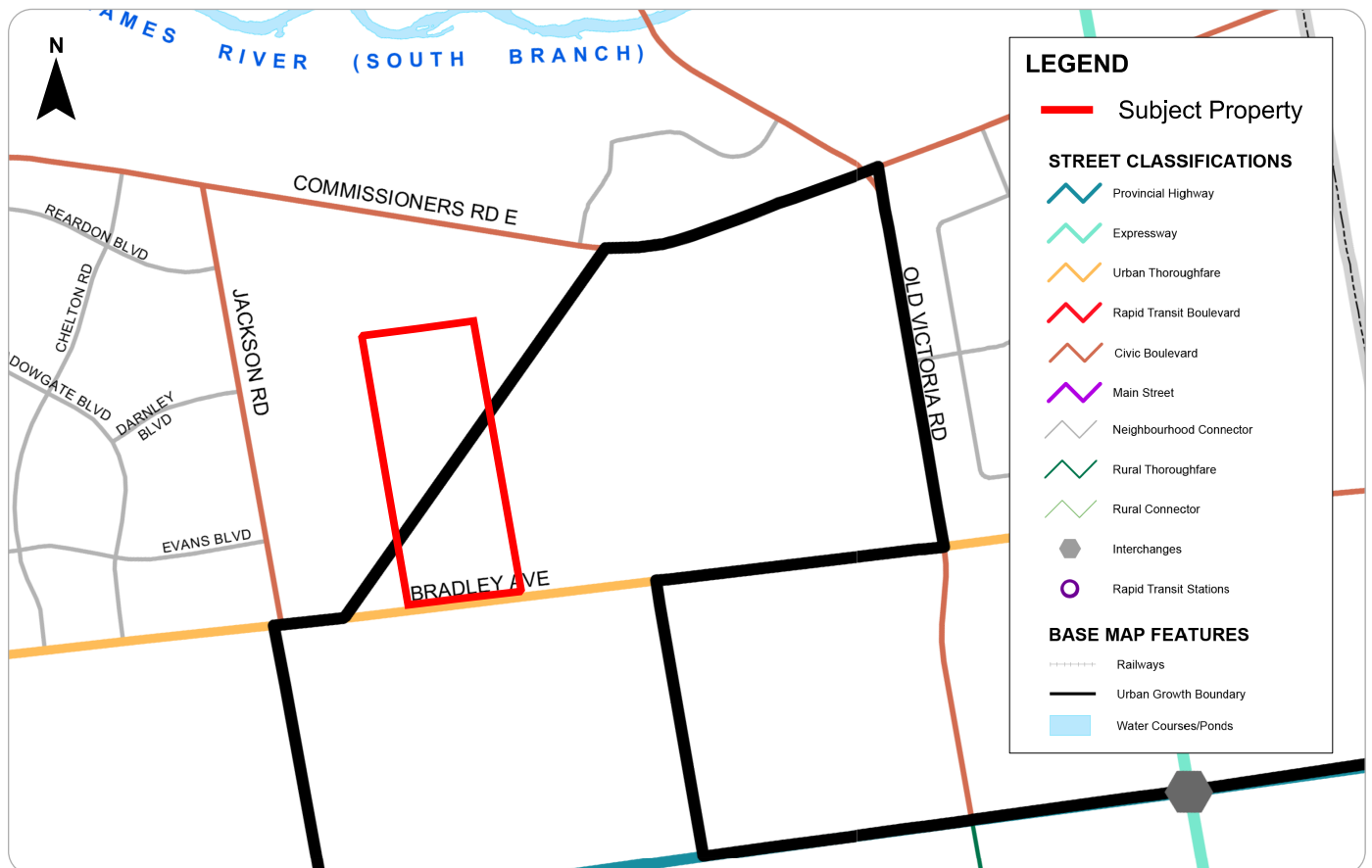


Figure 4: Map 3 – Street Classifications

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 regarding 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”. Further, Section 757 notes that “the Green Space Place Type is made up of a system of public parks and recreational areas, private open spaces, and our most cherished natural areas. It encompasses a linear corridor along the Thames River, which represents the natural heritage and recreational spine of our city. It also encompasses our hazard lands, including our valleylands and ravines, and the floodplains associated with our river system.”

The proposed development strongly promotes these policies by providing protection and strong buffers from the environmentally significant lands on the property. The enclosed Concept Plan indicates enhanced protection and connects to the natural heritage features through the promotion of pedestrian connections. Conservation of the Green Space designated lands will help strengthen the resiliency of the Dingman Creek Subwatershed. In addition, a 30m buffer and open space corridor will have a pathway introduced to connect the proposed development to a planned trail system along with a new parkette. This connector and additional park land will allow residents to enjoy the environment through passive recreational activities while protecting the natural integrity of the feature. This plan is therefore in alignment with the Section 247 policy which asserts that *public spaces should be located and designed within neighbourhoods to ensure access, visibility, safety, and connectivity to the adjacent street network.*

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 lands that speaks to 3. Provincially Significant Wetlands, 4. Significant Woodlands and Woodlands that were identified on, or adjacent to the subject lands.

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”.

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 an approximate 30 metre buffer from the significant woodlands to ensure that there will be no negative impacts on the natural features or their ecological functions. The EIS concludes that the proposed development 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.

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

The proposed Zoning By-law Amendment is required to rezone the subject lands from its current UR4 – Urban Reserve Zone, and Environmental Review (ER) to the following Place Types (zones):

- **Residential R1 (R1-3) Zone**
- **Residential R4 Special Provision (R4-6(XX)) Zone**
- **Residential R6 Special Provision (R6-5(XX)) Zone**
- **Open Space 1 (OS1)**
- **Open Space 5 (OS5)**
- **Urban Reserve 4 (UR4)**

For the residential component, the Urban Reserve Zone permits existing dwellings; agricultural uses; conservation lands; managed woodlot; wayside pit; passive recreation use; and farm gate sales. The Residential R1 (R1-3) Zone permits single detached dwellings on lots with a minimum lot frontage of 10 metres and a minimum lot area of 300 square metres. The Residential R4 (R4-6) Zone permits street townhouse dwellings having a lot area per unit minimum of 145 square metres. The Residential R6 (R6-5) Zone permits the following residential uses: cluster single detached, semi-detached, duplex, triplex, and fourplex dwellings; townhouses and stacked townhouses; and low rise apartment buildings.

Table 1 shows a breakdown of a the zoning that is requested to be applied to each of the blocks. Site-specific exceptions are required for frontage and density, the specificities of which are outlined in the table and in the draft Zoning By-law Amendment.

Table 2: Zoning Comparison Table

Subdivision Lots / Blocks	Zoning Request	Special Provision
Lots 1 – 47	From UR4 to R1-3	N/A
Blocks 48 – 67	From UR4 to R4-6(XX)	Minimum Frontage of 6.7 metres per unit
Block 68	From UR4 to R6-5(XX)	Maximum Density of 50 units per hectare
Block 69	From UR4 to OS1	N/A
Block 70	Remaining UR4 Zone	N/A
Blocks 71 and 72	From ER to OS5	N/A

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3. EXISTING CONDITIONS

3.1 ARCHAEOLOGICAL / BUILT HERITAGE CONCERNS

The 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 has been incorporated into the development. Comments on this report have been generally accepted and will be refined through the conditions of draft approval.

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 was recommended. Based on the results of the Stage 1 background investigation and the subsequent Stage 2 archaeological assessment dated January 30th, 2024, the study area contains 10 archaeological sites of no further cultural heritage value and interest, and no additional archaeological assessments are recommended for the sites or for the surveyed area. This report has been filed with the Ministry along with an expedited review request letter in order to align with the planned development timelines.

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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 townhouse condominium block. The complete breakdown in the number of units with the total area is provided in the table below.

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 a road within the adjacent approved subdivision (Street 'N'). In addition, Street 'D' will connect through the adjacent subdivision to provide a secondary access. The Applicant is in discussions with the neighbour to make appropriate arrangement for the construction of Street 'N' to obtain access to Jackson Road.

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 3: Subdivision table

	Number of Units	Area
Single Detached Residential	47	2.029 ha
Street Townhouses	134	2.956 ha
Condo Townhouse Block	Approx. 90 (tbd)	1.871 ha
Total	271	23.341 ha. (total site area)

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' and looped through Street 'D'.

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 the Draft Plan of Subdivision. A detailed conceptual design of a future condominium townhouse block was provided to illustrate the potential configuration. This design will be further refined as part of a future site plan and condo applications.

This report was found to be acceptable by Planning staff.

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5. CIVIL ENGINEERING DESIGN

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 Functional Servicing and Stormwater Management Report was submitted as part of the Draft Plan of Subdivision application (July 26, 2023).

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 are 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.

It should be noted that the civil design was prepared prior to the addition of Street 'D' through the adjacent lands. The engineering design will need to be revised to incorporate revised looping of infrastructure. This is also captured within the draft conditions of approval.

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6. TRANSPORTATION

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. The TIA was submitted as part of the first Draft Plan of Subdivision application (July 26, 2023).

6.2 INTERNAL ROAD NETWORKS

Internal Road Networks for the proposed development of the subject lands are indicated on the Draft Plan of Subdivision and further described in this letter. Like the engineering design, the transportation analysis will need to be revised to accommodate Street 'D'.

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7. ENVIRONMENTAL STUDY

7.1 FOCUSED ENVIRONMENTAL IMPACT STUDY (EIS)

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 lands 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. The Focused Environmental Impact Study was submitted as part of the first Draft Plan of Subdivision application (July 26, 2023).

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8. PUBLIC CONSULTATION STRATEGY

In accordance with the policies outlined in the Planning Act, a Public Consultation Strategy is required for the Zoning By-law Amendment Application which is undertaken as part of a public process.

Once the application has been deemed complete, it will be scheduled for a Statutory Public Meeting before the Planning, Design and Development Committee. Once the date is identified, a notice sign will be posted on the subject lands. The notice sign will articulate the date, time, and location of the public meeting, the application submitted, the proposed development concept, and provide contact information for citizens wishing to submit written comments regarding the application.

In addition, City Staff will circulate meeting notices to all property owners within 120 metres (400 feet) of the subject lands. Notice will also be posted by the City on the website and made available through local media postings.

At the Statutory Public meeting, all interested persons will be given the opportunity to express concerns and opinions by way of a deputation. All deputations will be made a matter of the public record. The applicant will work with City Staff to address, to the extent possible, any and all concerns articulated at the Statutory Public Meeting. Comments and input received will be considered by the applicant and any appropriate revisions to the plans will be made through a resubmission.

We trust that the foregoing Public Consultation Strategy is satisfactory and in compliance with provincial legislation. Weston Consulting remains committed to facilitating additional public engagement, if required.

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9. PLANNING ANALYSIS AND CONCLUSION

The proposed residential development plan will make efficient use of these lands for community uses located within the Urban Growth Boundary. The development of the subject lands provides for a logical extension of the adjacent development. The proposed development conforms to Provincial policies, the City of London Official Plan, and the general purpose of the Zoning By-law. Specifically, the proposed following Place Types (zones) are being proposed:

- **Residential R1 (R1-3) Zone:** The R1-3 Zone provides for and regulates single detached dwellings. This Zone variation specifically deals with existing inner-City smaller lot single dwelling developments. This is the most appropriate zone for the single detached dwellings located in lots 1 – 47.
- **Residential R4 Special Provision (R4-6(XX)) Zone:** The R4 Zone provides for and regulates medium density residential development in the form of street townhouses. Different intensities are permitted through the zone variations. The R4-6 zone variation is the most appropriate for the townhouses located in Blocks 48 – 67. A site-specific exemption is being sought as shown in the enclosed draft Zoning By-law Amendment.
- **Residential R6 Special Provision (R6-5(XX)) Zone:** Generally, the R6-5 zone and its variations are intended to provide for and regulate low-rise development in various forms of cluster housing, single detached dwellings and townhouses. The R6(5) variation is the most permissive in terms of permitted housing typologies and will be applied to Block 68 which will be occupied by condominium townhouses. A site-specific exemption is being sought as shown in the enclosed draft Zoning By-law Amendment.
- **Open Space 1 (OS1):** The OS1 Zone variation is typically applied to City and private parks with no or few structures.

This is the most appropriate place type for the park block as shown in the enclosed draft Zoning By-law Amendment

- **Open Space 5 (OS5):** The OS5 Zone variation applies to important natural features and functions that have been recognized by Council as being of City-wide, regional, or provincial significance and identified as components of the Natural Heritage System of the Official Plan. In order to protect the identified features and functions, permitted activity is limited to a range of low-impact uses associated with passive recreation, conservation and ecosystem management. This is the most appropriate place type in this application to protect the natural heritage feature and associated buffer as shown in the enclosed draft Zoning By-law Amendment.
- **Urban Reserve 4 (UR4):** This Zone provides for and regulates existing uses on lands which are primarily undeveloped for urban uses. Generally, these uses have limited structures. The Urban Reserve Zone is intended to protect large tracts of land from premature subdivision and development to provide for future comprehensive development on those lands. This proposal contemplates maintaining the portion of the hydro corridor within the urban boundary.

The accompanying draft Zoning By-law Amendment seeks to implement the land uses to the above noted Place Types to permit the proposed development which mirrors the existing Draft Plan of Subdivision for the subject lands. The proposed Zoning By-law Amendment conforms to the policy framework and is the mechanism required to bring the zoning for the subject lands into conformity with the existing policy regime. It is our opinion that the proposed development represents good planning and urban design principles. The proposed Zoning By-law Amendment has merit and should be processed in accordance with the approvals process prescribed by the Planning Act.

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