

PLANNING JUSTIFICATION REPORT

1338-1388 SUNNINGDALE ROAD EAST

Auburn Developments Inc. on behalf of Auburn Homes Inc.

May, 2024



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1.0 Introduction

Auburn Developments Inc. on behalf of Auburn Homes Inc. is seeking approval of a Zoning By-law Amendment (ZBA) to implement the City of London’s Official Plan (The London Plan or TLP). The ZBA requests the application of several residential zone categories to allow for flexibility in determining an appropriate use through an eventual development application.

The Subject Lands are comprised of four former single-family lots which have been assembled for comprehensive redevelopment. Previous municipal addresses were (from west to east):

- 1338 Sunningdale Road East
- 1352 Sunningdale Road East
- 1376 Sunningdale Road East
- 1388 Sunningdale Road East

This Planning Justification Report has been prepared for submission to the City of London and includes discussion of the relevant policy framework within the City of London and the province of Ontario, as well as brief discussion of the supplementary studies which have been prepared in support of the Application. The proposed rezoning is consistent with Provincial and Municipal policies.

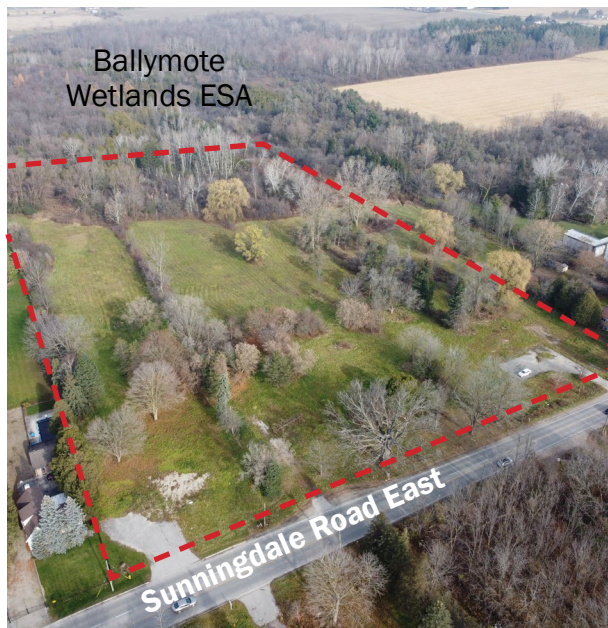


Figure 1: Aerial view of the Site, looking north with Ballymote Wetlands ESA to the north of the site



Figure 2: Aerial view of the Site, looking northwest with Ballymote Wetlands ESA to the north of the site

1338-1388 Sunningdale Road East



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- | | |
|----------------------------|-------------------------------------|
| Subdivision Applications | Zoning Applications |
| Under Review | Official Plan / Zoning Applications |
| Draft Approved | Site Plan Applications |
| Condominium Applications | Minor Variance Applications |
| Under Review | Consent Applications |
| Draft Approved | Removal of Holding Provisions |
| Official Plan Applications | Part Lot Control Applications |

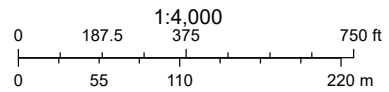


Figure 3: Subject Lands Context Plan, City of London

2.0 Description of Subject Lands and Surrounding Land Uses

The Subject Lands have been assembled for redevelopment and intensification. Demolition permits for the former single family residences were issued in February of 2021 and the lands have been maintained in their present state since demolition occurred.

The Subject Lands are located north of Sunningdale Road East and west of Highbury Avenue North in the Stoney Creek Planning District. The closest street intersection is at Sunningdale Road East and North Wenige Drive, approximately 65m west of the property. The Subject Lands have a total area of 4.68 hectares with a lot frontage along Sunningdale Road East of approximately 170 metres and a lot depth of approximately 275m. The site is rectangular in shape.

Given that Sunningdale Road East is identified in The London Plan as a Civic Boulevard, a land dedication along the frontage of Sunningdale Road East (8.2m) will be required as part of a future development application to implement the designated right-of-way width of 36 metres (Figure 4).

DESIGN FEATURES	STREET CLASSIFICATION				
	Provincial Highway	Expressway	Rapid Transit Boulevard	Urban Thoroughfare	Civic Boulevard
Planned Street Width (Width of Right-of-Way)	x	100m	50m	45m	36m

Figure 4: Excerpt from The London Plan, Chapter 5 - City Building Policies (Table 6)

Within and abutting the Subject Lands are the Ballymote Wetland Environmentally Sensitive Area and the Arva Moraine Wetland Complex which extends north and east of the site. A provincially significant wetland (PSW) within the Arva Moraine Wetland Complex is present on the northern portion of the site. The PSW and its associated buffer total approximately 1.87 hectares, being approximately 40% of the overall site area.

The surrounding area is predominantly developed with ground-related housing consisting of single detached homes and multiple forms of townhomes. There are future development lands across Sunningdale Road East to the south (39T-07502) which have received Draft Plan Approval at the Ontario Land Tribunal (OLT-22-004106). They are shown in relation to the site on Figure 3 on page 2.

The related Official Plan Amendment and implementing Zoning By-law Amendment for 39T-07502 provide for medium density residential uses on the south side of Sunningdale Road East in proximity to the Subject Lands. Zoning By-law designations for those lands include R6-5(89) and R8-4(86) allowing for development up to 100 units per hectare at 6 storeys / 22 metres in height.

Development to the west consists of a contemporary greenfield subdivision (33M-631) which is primarily made up of freehold and condominium single family dwellings. The Ballymote Wetland ESA and Arva Moraine Wetland Complex extends to the north and west, abutting subdivision 33M-631 and has been buffered from that development with a 10 metre trail corridor which can be seen in the aerial photo below (Figure 5).

The Subject Lands had previously been used as four individual single family residences and the physical features on site are typical of such use. Anthropogenic tree plantings, large areas of maintained turf and some hard surfacing including asphalt and concrete are present. There is a parcel containing a single family dwelling abutting the Subject Lands to the west.

Most trees associated with past residential uses would be required to be removed to support an eventual development application. No development application is being advanced at this stage and as such a Tree Preservation Plan has not been prepared for the ZBA application.

Trees located within and immediately adjacent to the wetland feature will be retained within a buffer to the wetland as is described within the Environmental Impact Study, prepared by MTE Consultants (April, 2024) and included in the application package.



Figure 5: Aerial photo of the subject site looking north and adjacent greenfield development with 10m buffer to Ballymote Wetland ESA and Arva Moraine Wetland Complex

3.0 Content of the Application

Currently, the lands are zoned R1-14, UR3/UR3*h-2, and OS5. The residential R1-14 zoning is reflective of the past use of the lands as large lot single family dwellings on private services. The UR3 and UR3*h-2 zones reflect the status of the lands in The London Plan as Neighbourhoods-designated lands adjacent a natural heritage feature requiring further evaluation. The portion of the lands zoned OS5 contains the wetland at the northern limit of the property.

A map identifying the existing zoning on the Subject Lands and surrounding area is provided on the following page as Figure 6. A figure showing the proposed zoning being requested through this application is included as Figure 7 on page 7.

Auburn Developments Inc. is seeking approval of a ZBA to implement the following zone categories:

R5-4

Cluster Townhomes and Cluster Stacked Townhomes at a density not exceeding 40 units per hectare

R6-5(*)

Ground-related housing forms and low-rise apartments at a density not exceeding 75 units per hectare

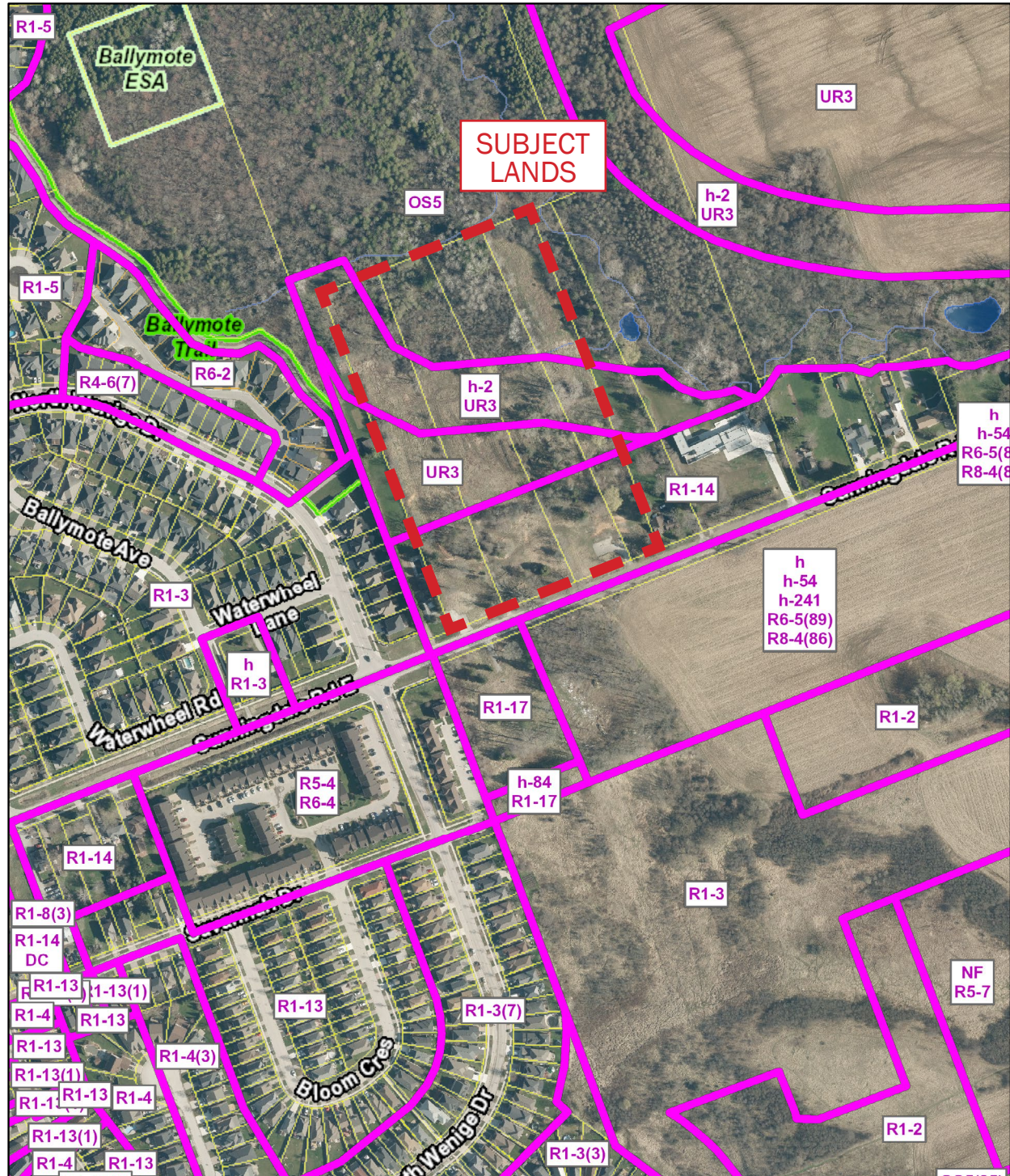
Proposed Special Provision

Density (maximum) - 75 units per hectare


R7*H15*D75

Senior living and care homes at a height not exceeding 15 metres and a density not exceeding 75 units per hectare

1338-1388 Sunningdale Road East



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 Z.-1 Zones

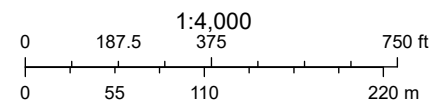


Figure 6: City of London Zoning Map - Current Zoning (R1-14/UR3/UR3*h-2/OS5)

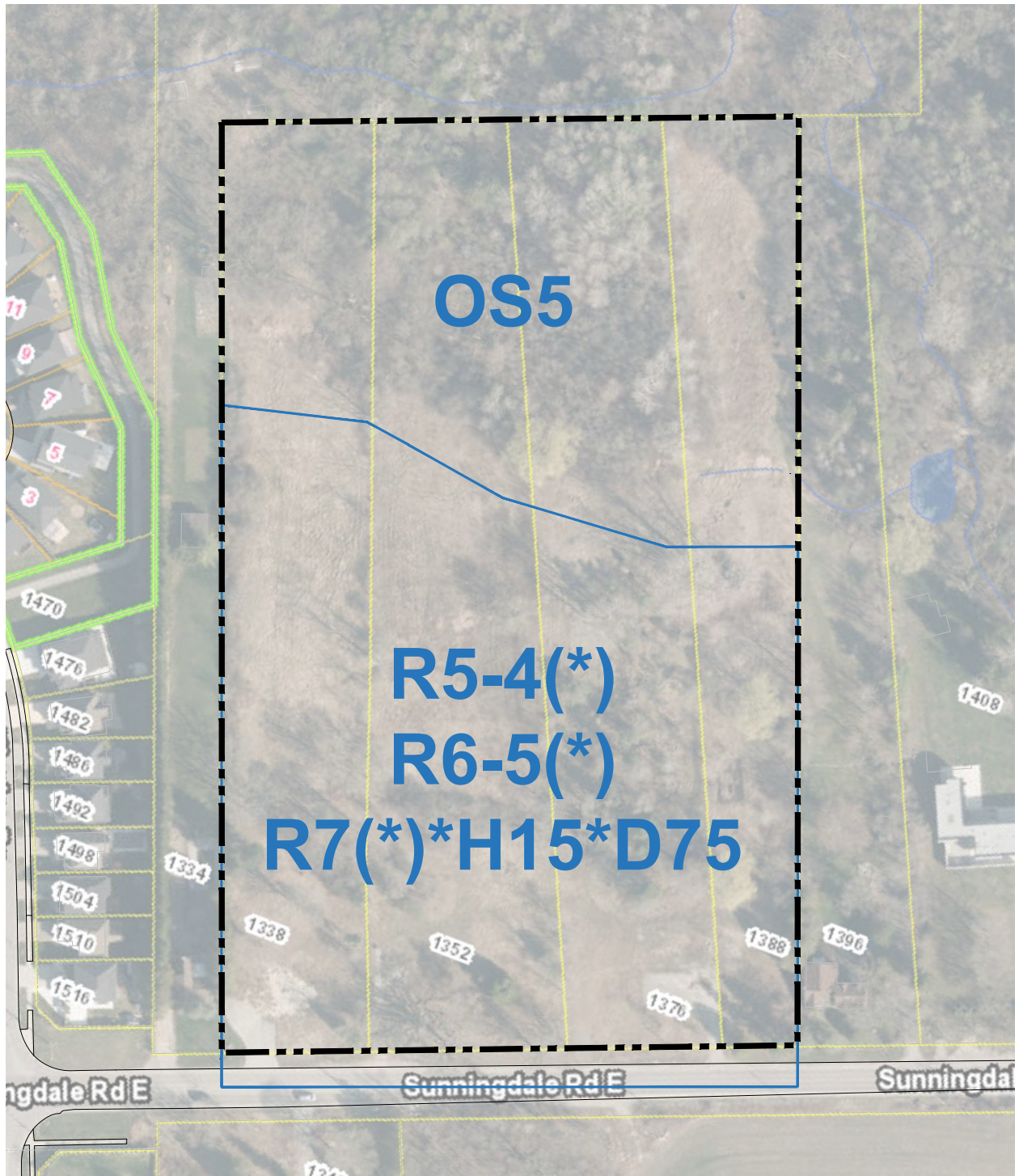


Figure 7: Proposed Zoning

4.0 Planning Policy Analysis

4.1 Provincial Policy Statement (PPS, 2020)

In accordance with Section 3 of the Planning Act, the Province of Ontario issued the latest iteration of the Provincial Policy Statement (PPS) in May of 2020. The PPS is a guiding document for all planning and land use matters in Ontario.

The following is an analysis of relevant Provincial policy with respect to the subject application for 1338-1388 Sunningdale Road East. All land use planning decisions made in Ontario must conform to the PPS.

PPS Section 1.1.1 - Healthy, Livable and Safe Communities

- a. promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;
- b. accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;
- c. avoiding development and land use patterns which may cause environmental or public health and safety concerns;
- d. avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas which are adjacent or close to settlement areas;
- 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;
- h. promoting development and land use patterns that conserve biodiversity; and
- i. preparing for the regional and local impacts of a changing climate.

The subject application will implement the current land use designations within The London Plan of Neighbourhoods and Green Space. The Subject Lands represent an underutilized site where the proposed increase in residential land use permissions would allow for the efficient use of existing infrastructure to create additional housing supply on lands designated for growth.

There are many significant amenities located within the Stoney Creek and larger north London community including the Stoney Creek Community Centre and Masonville Mall. Opportunities to live, shop, work, and play within this community warrant residential intensification where appropriate.

PPS Section 1.1.2

Section 1.1.2 of the PPS requires that sufficient land supply be made available to accommodate a mix of land uses which will meet the needs of the City of London for a period of up to 25 years.

The Subject Lands are identified as a future development parcel through the application of the Neighbourhoods Place Type on Map 1 of The London Plan. The expansion of land use permissions per the proposed rezoning will allow for creation of a wider range of housing at higher densities than existed previously.

PPS Section 1.1.3 - Settlement Areas

Section 1.1.3 of the PPS requires that settlement areas be the focus of growth and development in Ontario. It directs that communities establish patterns of development to conserve land and ensure efficiency of land use. This includes making efficient use of existing infrastructure, promoting green spaces, and minimizing unnecessary public expenditures.

1.1.3.2 Land use patterns within settlement areas shall be based on densities and a mix of land uses which:

- a. efficiently use land and resources;
- b. are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;
- c. minimize negative impacts to air quality and climate change, and promote energy efficiency;
- d. prepare for the impacts of a changing climate;
- e. support active transportation;
- f. are transit-supportive, where transit is planned, exists or may be developed; and
- g. are freight-supportive.

Land use patterns within settlement areas shall also be based on a range of uses and opportunities for intensification and redevelopment in accordance with the criteria in policy 1.1.3.3, where this can be accommodated.

Intensification is defined within the PPS as:

the development of a property, site or area at a higher density than currently exists through:

- a. redevelopment, including the reuse of brownfield sites;
- b. the development of vacant and/or underutilized lots within previously developed areas;
- c. infill development; and
- d. the expansion or conversion of existing buildings.

This proposal would allow for significant intensification of underutilized lands by increasing the site density of approximately 0.8 units per hectare to between 30 and 75 units per hectare, dependent on the use proposed through a future development application.

PPS Section 1.1.3.3 requires that municipalities promote and facilitate transit-supportive development. Although the Subject Lands are not within the City’s Primary Transit Area as defined within The London Plan, there is existing transit service in proximity to the site. The nearest transit stop is approximately 150m away on South Wenige Drive south of Sunningdale Road East (Figure 8). London Transit Route 19 (Stoney Creek to Downtown) provides access to the Stoney Creek Community Centre, Masonville Mall, a large commercial development at Hyde Park Road and Fanshawe Park Road, and to downtown London.

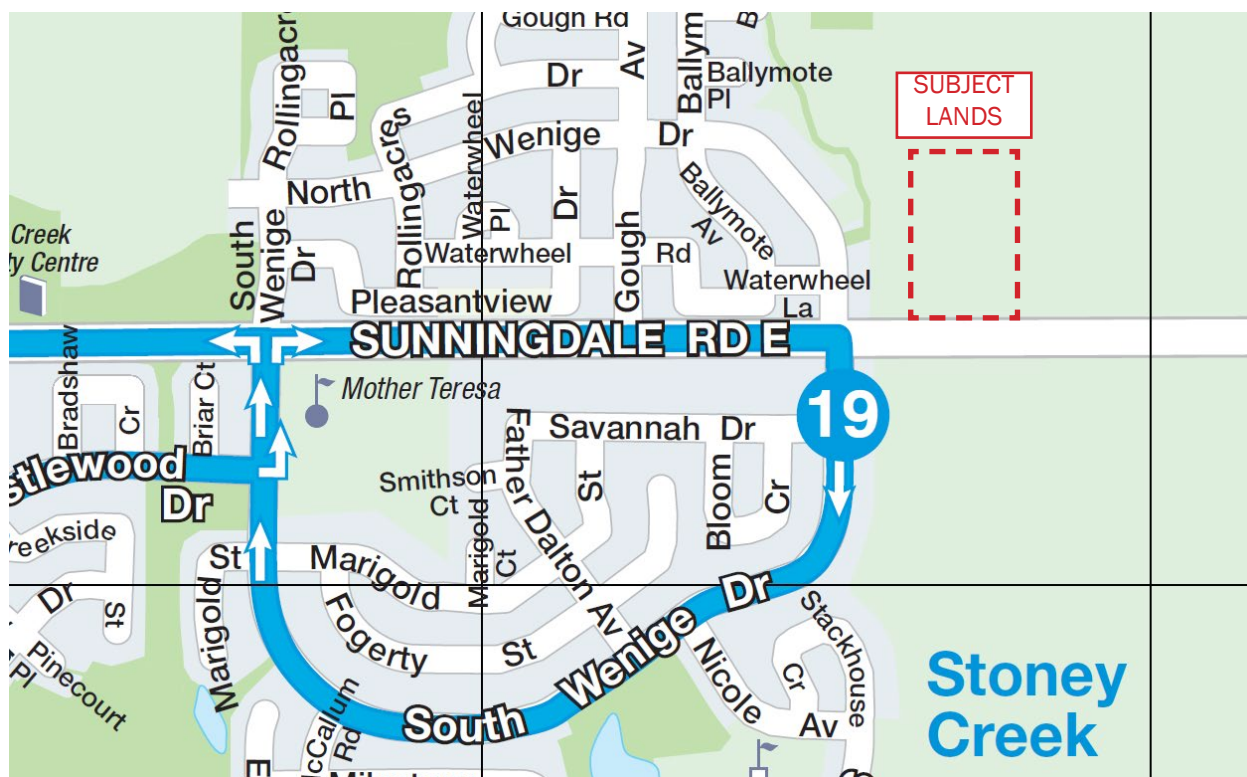


Figure 8: London Transit Route Mapping, Route 19

PPS Section 1.4 - Housing

1.4.1 To provide for an appropriate range and mix of housing options 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 15 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.

The proposed ZBA would expand the range of residential land use permissions for the Subject Lands, increasing the City's supply of land suitable for housing development in the immediate term.

The various zone categories being sought through this application will provide for flexibility in developing the site in keeping with the Provincial priority to establish a range and mix of housing options across communities.

Established land use permissions and existing development in proximity to the site includes low and medium rise residential housing forms. A similar range of permissions is being requested for the Subject Lands, ensuring compatibility with existing and future neighbourhoods and furthering the City's ability to provide for housing within designated growth areas.

PPS Section 1.6 - Infrastructure and Public Service Facilities

1.6.1 Infrastructure and public service facilities shall be provided in an efficient manner that prepares for the impacts of a changing climate while accommodating projected needs.

Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they are:

- a. financially viable over their life cycle, which may be demonstrated through asset management planning; and
- b. available to meet current and projected needs.

As discussed previously, there are substantial existing public service facilities in proximity to the Subject Lands including Mother Theresa Secondary School and Stoney Creek Community Centre, the latter of which includes a public library in addition to various active recreation amenities. Stoney Creek Community Centre is an example of the implementation of PPS Policy 1.6.5 which recommends co-location of various public service facilities to promote cost-effectiveness in program delivery and public access.

Through a short extension of existing infrastructure to the site from the intersection of Sunningdale Road East and North Wenige Drive, the site can be serviced by the City's existing infrastructure network with no downstream capacity upgrades required. This is discussed briefly in Section 7.0 of this report and in full detail within the Preliminary Servicing Report prepared by MTE Consultants (March, 2024).

Section 2.1 - Natural Heritage

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.

2.1.4 Development and site alteration shall not be permitted in:

- a. significant wetlands in Ecoregions 5E, 6E and 7E1; and
- b. significant coastal wetlands.

2.1.8 Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 2.1.4, 2.1.5, and 2.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.

The Environmental Impact Study (EIS) prepared by MTE Consultants (April, 2024) has confirmed that no negative impacts on the natural heritage features will occur as a result of residential development on site by developing a set of recommended mitigation measures.

The EIS details a recommended buffer which has been incorporated into the proposed rezoning of the site with the proposed expansion of the existing OS5 zone. The establishment of the OS5 zone limit confirms that no residential development will occur within the PSW and further that any eventual development will be an appropriate distance away from the feature so as to mitigate any potential impacts.

Summary of Analysis - Provincial Policy Statement

The proposed rezoning of the Subject Lands to facilitate a mix of housing types at significantly greater densities than existed previously represents good planning, efficient use of land and municipal infrastructure, and is in conformity with the Provincial Policy Statement, 2020.

4.2 City of London Official Plan (The London Plan, 2016)

The London Plan, London’s official plan, is the highest order planning policy document within the City of London. It emphasizes intensification, efficiency of land use in redevelopment, high quality design and walkable neighbourhoods, and protection of agricultural and natural heritage resources.

This section includes discussion of policies within The London Plan which are implemented by and/or support the proposal to rezone the Subject Lands.

As depicted in Figure 10 on the following page, the Subject Lands have been split designated as Neighbourhoods and Green Space Place Types on Map 1 of The London Plan.

In conjunction with the classification of Sunningdale Road East as a Civic Boulevard on Map 3 of The London Plan, the Neighbourhoods Place Type qualifies the Subject Lands for a broad range of residential land use permissions in accordance with Table 10 (Figure 9, right) and Table 11 of The London Plan.

The following figures depict the location of the Subject Lands on select maps from The London Plan:

Figure 10: Map 1 - Place Types

Figure 11: Map 3 - Street Classifications

Figure 12: Map 4 - Active Mobility Network

Figure 13: Map 5 - Natural Heritage

Figure 14: Map 6 - Hazards and Natural Resources

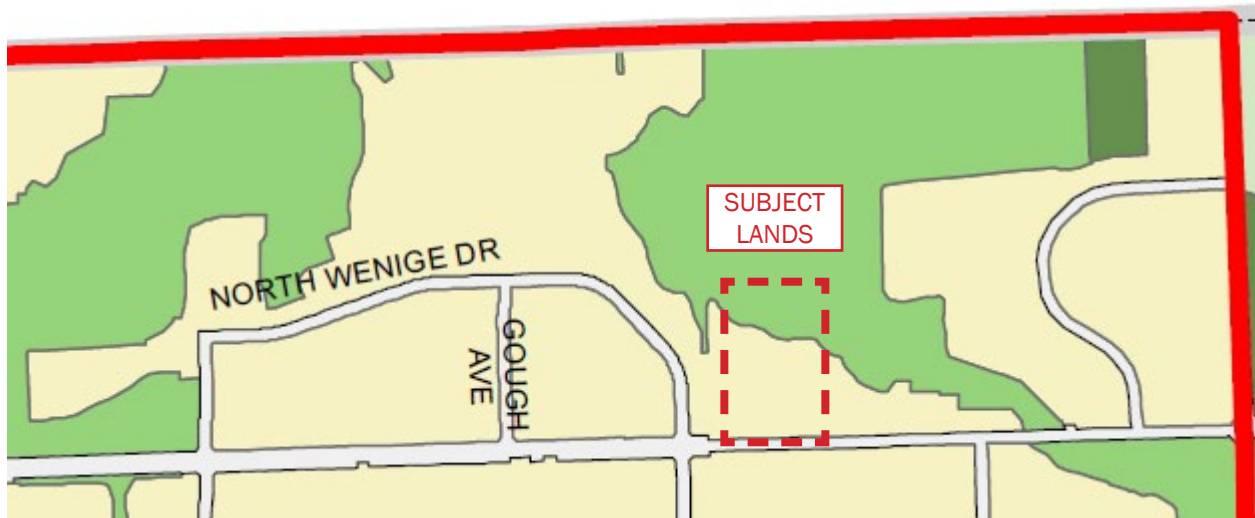
Overlay comparisons with the proposed zone limit are provided in context with the following London Plan Maps:

Figure 15: Map 1 - Place Types

Figure 16: Map 5 - Natural Heritage

Street onto which the property has frontage	Range of primary permitted uses
Neighbourhood Street	<ul style="list-style-type: none"> • Single detached • Semi-detached • Duplex • Converted dwellings • Townhouses • Additional residential units • Home occupations • Group homes
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
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

Figure 9: Excerpt from The London Plan, Chapter 6 - Place Type Policies (Table 10)



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PLACE TYPES




















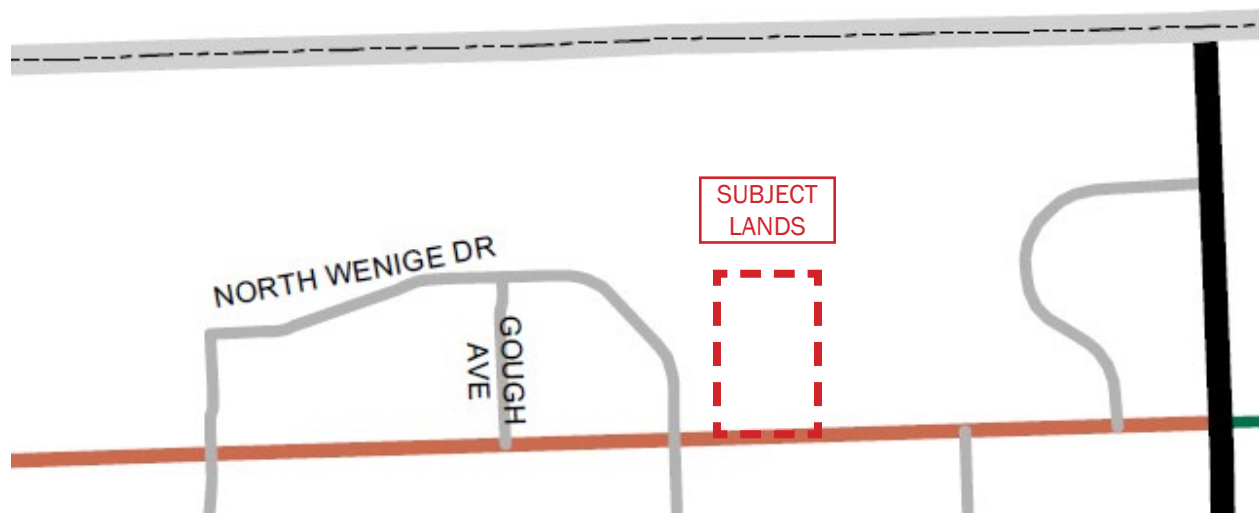
	Green Space		Heavy Industrial
	Environmental Review		Light Industrial
	Downtown		Commercial Industrial
	Transit Village		Future Community Growth
	Rapid Transit Corridors		Future Industrial Growth
	Urban Corridors		Farmland
	Shopping Area		Rural Neighbourhoods
	Main Street		Waste Management Resource Recovery Area
	Neighbourhoods		Urban Growth Boundary
	Institutional		

Figure 10: The London Plan, Map 1 - Place Types



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STREET CLASSIFICATIONS












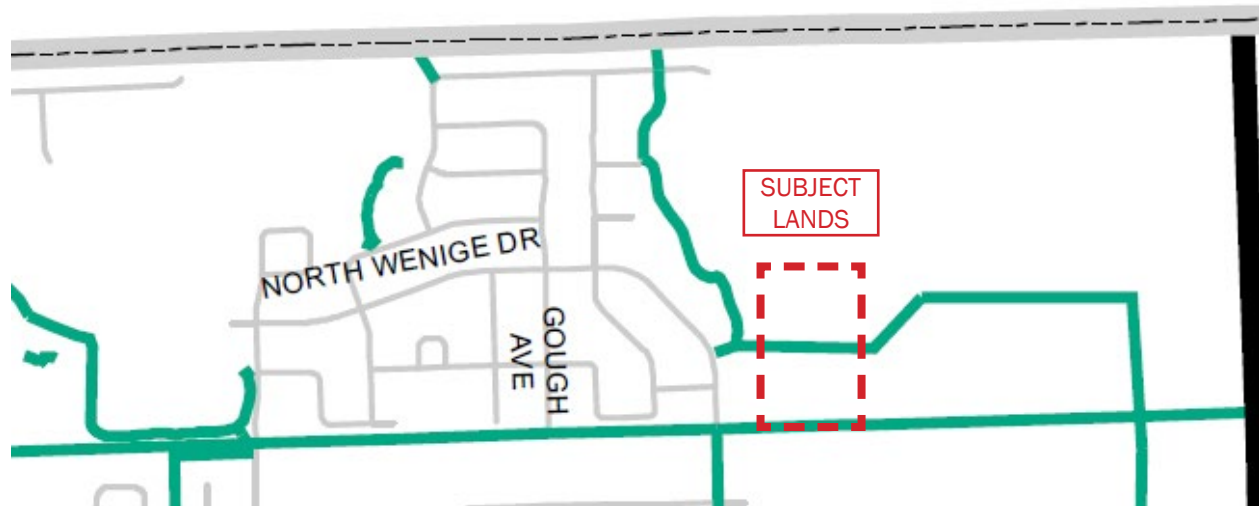
	Provincial Highway		Neighbourhood Connector
	Expressway		Rural Thoroughfare
	Urban Thoroughfare		Rural Connector
	Rapid Transit Boulevard		Interchanges
	Civic Boulevard		Rapid Transit Stations
	Main Street		

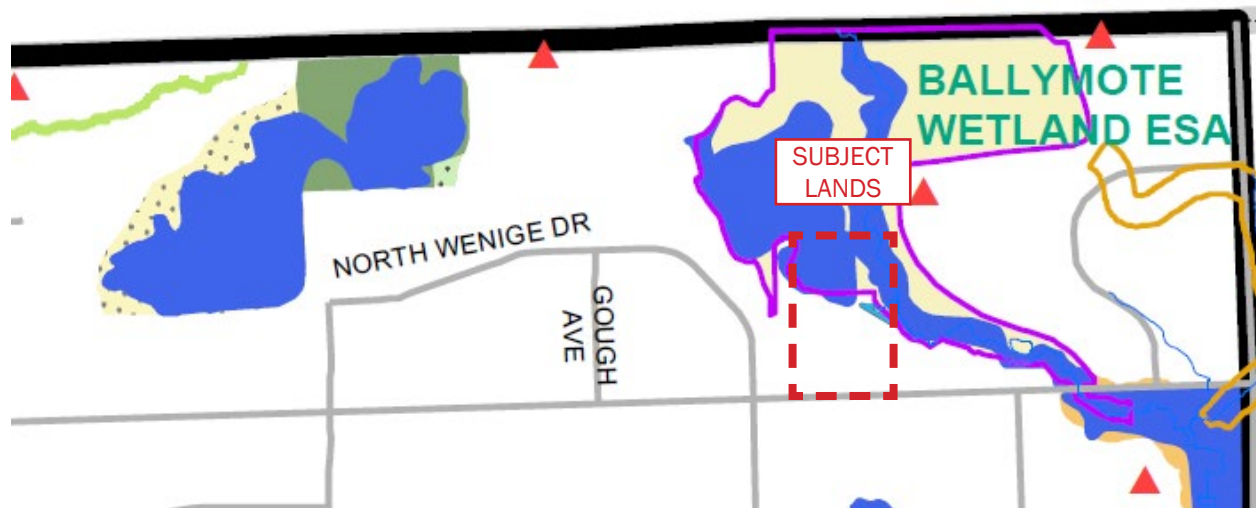
Figure 11: The London Plan, Map 3 - Street Classifications



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- Thames Valley Parkway
- Cycling and Walking Routes

Figure 12: The London Plan, Map 4 - Active Mobility Network



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NATURAL HERITAGE SYSTEM













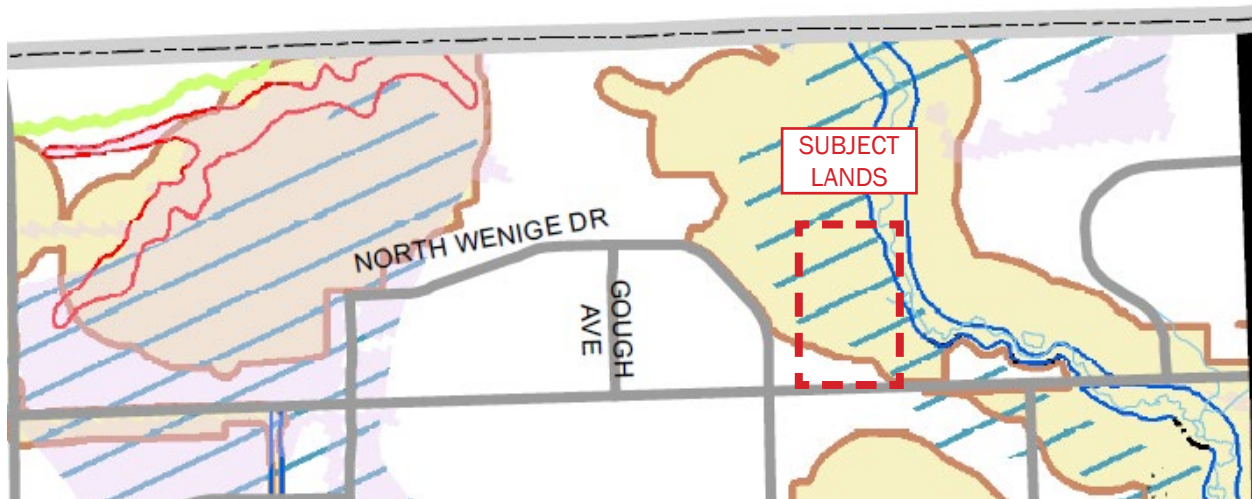
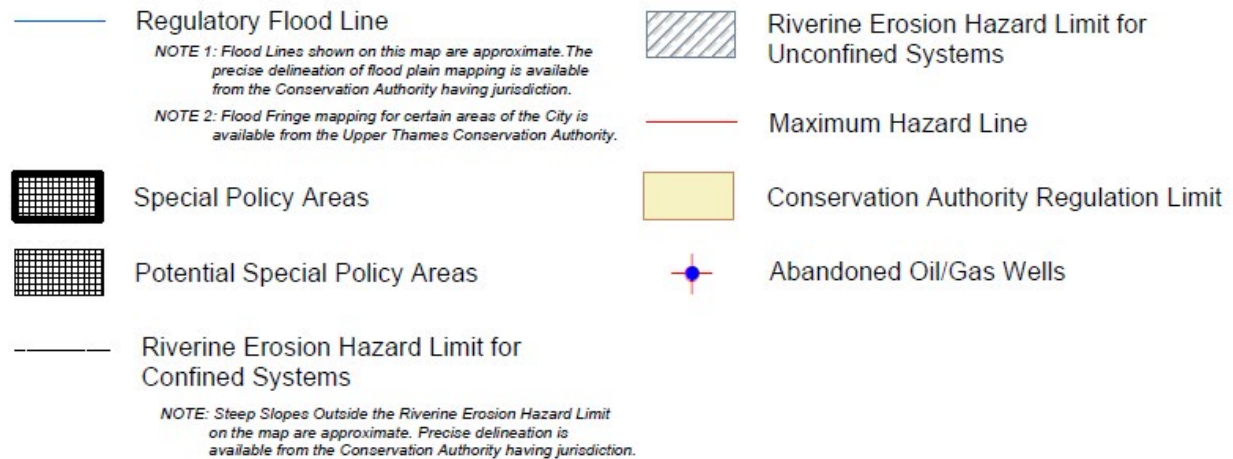
	Provincially Significant Wetlands		Areas of Natural and Scientific Interest
	Wetlands		Environmentally Significant Areas (ESA)
	Unevaluated Wetlands		Potential ESAs
	Significant Woodlands		Upland Corridors
	Woodlands		Potential Naturalization Areas
	Significant Valleylands		Unevaluated Vegetation Patches
	Valleylands		

Figure 13: The London Plan, Map 5 - Natural Heritage



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HAZARDS



NATURAL RESOURCES



Figure 14: The London Plan, Map 6 - Hazards and Natural Resources

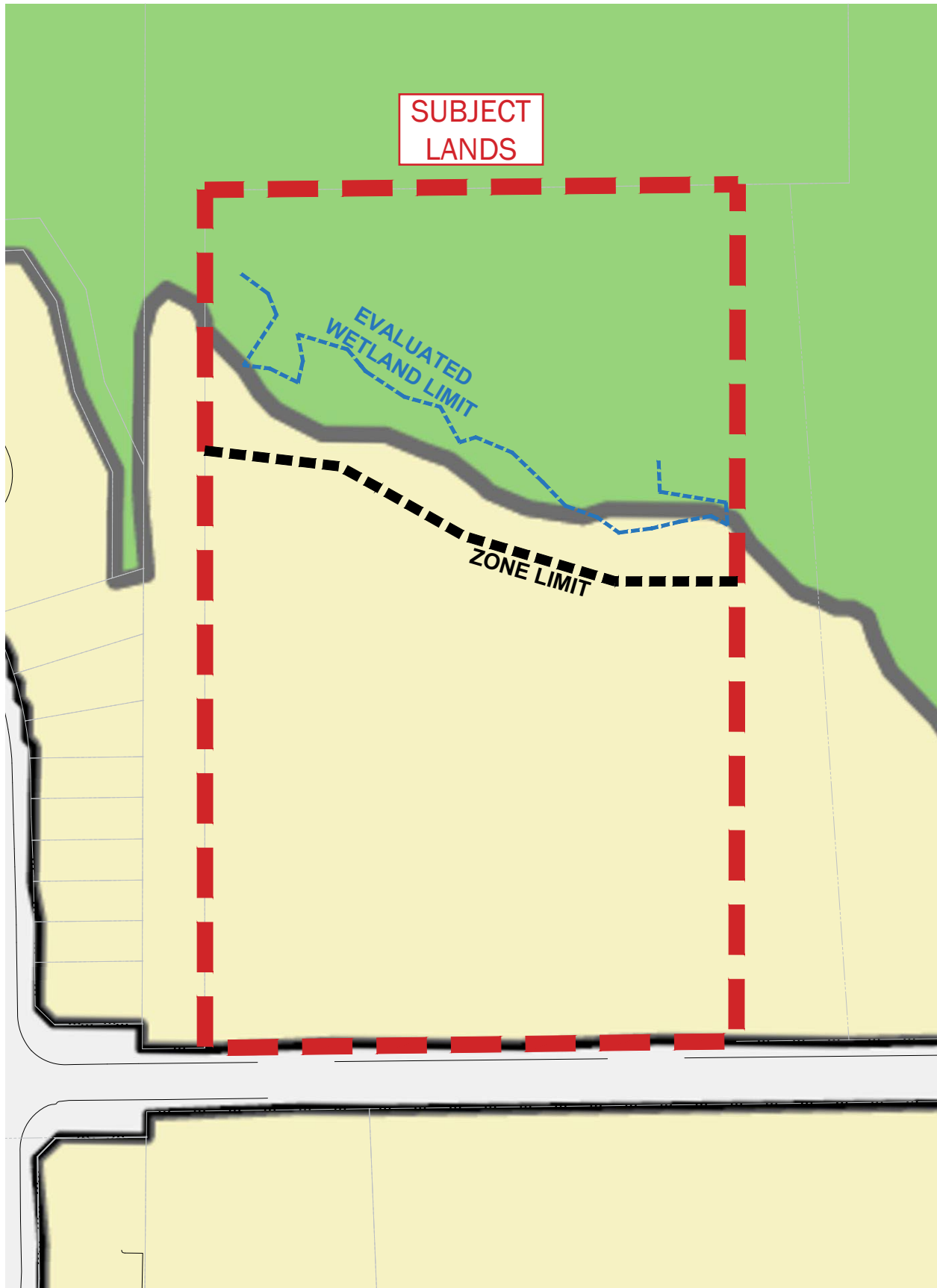


Figure 15: Proposed Zone Limit overlay with Map 1, Place Types



Figure 16: Proposed Zone Limit overlay with Map 5, Natural Heritage

Applicable Policy from TLP - Key Direction Policies

TLP 55_11: Plan for cost-efficient growth patterns that use our financial resources wisely.

TLP 57_1: Consider and support new Canadians through all the planning processes that we undertake.

TLP 57_11: Develop affordable housing that attracts a diverse population to the city.

TLP 58_4: Protect and enhance the health of our Natural Heritage System.

TLP 59_4: Plan for infill and intensification of various types and forms to take advantage of existing services and facilities to reduce our need to grow outward.

TLP 59_5: Ensure a mix of housing types within our neighbourhoods so that they are complete and support aging in place.

TLP 59_8: Manage outward growth through the use of an Urban Growth Boundary and by supporting infill and intensification in meaningful ways.

TLP 61_2: Design complete neighbourhoods by meeting the needs of people of all ages, incomes and abilities, allowing for aging in place and accessibility to amenities, facilities and services.

TLP 61_5: Protect what we cherish by recognizing and enhancing our cultural identity, cultural heritage resources, neighbourhood character, and environmental features.

TLP 62_1: Ensure that all planning decisions and municipal projects conform with The London Plan and are consistent with the Provincial Policy Statement.

TLP 62_9: Ensure new development is a good fit within the context of an existing neighbourhood.

Discussion of Key Directions

The Subject Lands are well-suited to accommodate new residential development and contribute to the range and mix of housing in Stoney Creek over and above their historical use as single family lots.

With the proposal to rezone the lands to accommodate a range of medium density residential uses, these lands have potential to yield a varied and affordable housing product which will be accessible to new Canadians and first-time home buyers in London.

The proposal to rezone the lands and refine the OS5 zone limit will provide for the protection and preservation of an existing ecological feature being the PSW and associated Ballymote ESA. As the site is located within the Urban Growth Boundary, no outward expansion or conversion of agricultural land is required to enhance the City's inventory of build-ready sites for new housing.

Much of the surrounding community is comprised of single family homes, and the proposed zoning would permit varied forms of housing for those looking to downsize or age in place. Stoney Creek is home to significant community amenities including the Stoney Creek Community Centre. The ability to transition through different stages in life within the same community by accessing different forms of housing will improve social connections and the sense of community within Stoney Creek. This application will create land inventory which is suitable for the delivery of unique and alternative housing forms in this community.

Applicable Policy from TLP - Our City

TLP 84_: Intensification may occur in all of the Place Types that allow for residential uses.

TLP 118_: Our natural heritage sets the context for conservation and protection when developing our growth plans. In conformity with the policies of this Plan, these lands will be protected, enhanced, restored, and conserved for their long-term sustainability.

TLP 170_: Development will be allowed, within the Urban Growth Boundary, only where the City has the ability and financial capacity to provide infrastructure services in accordance with the Development Charges By-law and capital budget to meet provincial environmental standards governing municipal services.

TLP 172_: The City shall be satisfied that adequate municipal infrastructure services can be supplied prior to any development or intensification proceeding and, where technically and economically possible, the City shall require such services to be located underground.

TLP 173_: Planning and development approvals will be discouraged where planned servicing capacity to accommodate the proposed use is not expected to become available within a five year time frame.

TLP 174_: Changes in place type and zoning that would result in the underutilization of previously planned and constructed municipal infrastructure will be discouraged.

Discussion of Our City Policies

The Subject Lands are split designated as Green Space and Neighbourhoods on Map 1 of The London Plan. The proposed ZBA will bring zoning into conformity with The London Plan and will facilitate implementation of these Place Type designations and policies through a future development application. These lands are identified as future growth lands and represent an opportunity to intensify existing residential lands within the Urban Growth Boundary.

As discussed in MTE's Preliminary Servicing Report (March, 2024), there is sufficient downstream capacity to accommodate medium density residential uses at up to 75 units per hectare. No downstream capacity upgrades are required, however there is an existing sanitary service located west of the site at Sunningdale Road East and North Wenige Drive which needs to be extended approximately 100 metres eastward to service the site.

The City may wish to implement a Holding (h) provision related to servicing availability to control development applications until such time as adequate servicing has been made available to the site through the extension of services to the east from North Wenige Drive.

Applicable Policy from TLP - City Building Policies

TLP 197_: The built form will be designed to have a sense of place and character consistent with the planned vision of the place type, by using such things as topography, street patterns, lotting patterns, streetscapes, public spaces, landscapes, site layout, buildings, materials and cultural heritage.

TLP 204_: Natural heritage is an important contributor to the character of an area and influences the overall street network. Neighbourhoods should be designed to preserve or create views to natural heritage features and landmarks through lotting patterns, street patterns, and building placement.

TLP 220_: Neighbourhoods should be designed with a variety of lot sizes to support a range of housing choices, mix of uses and to accommodate a variety of ages and abilities.

TLP 256_: Buildings should be sited so that they maintain and reinforce the prevailing street wall or street line of existing buildings. Where a streetscape has not been built out, buildings should be sited with regard for the planned street wall or street line.

TLP 313_5: Plan for development (use, intensity and form) that is conducive to the efficient operation and increased usage of public transit, walking and cycling.

TLP 347_: The active mobility network is shown on Map 4 of this Plan. This planned network will be considered in the evaluation of all planning and development applications.

TLP 357_: Cycling routes and pedestrian pathways will provide linkages between open space areas, neighbourhoods, centres, corridors, employment areas and the public transit services and will enhance the convenience, safety and enjoyment of walking and cycling.

TLP 381_: Lands may be acquired by the City for mobility purposes in conformity with the Our Tools part of this Plan and in accordance with the Planning Act.

TLP 616_: An archaeological assessment is required 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.

TLP 617_: Archaeological assessments shall be undertaken to the applicable level of assessment by a consultant archaeologist in compliance with provincial requirements and standards.

TLP 618_: All archaeological assessments shall be provided to the Ministry of Heritage, Sport, Tourism and Culture in accordance with the Ontario Heritage Act. The assessment report shall be provided to the City for comment to ensure that the scope is adequate and consistent with the conservation objectives of the City.

Discussion of City Building Policies

The proposal to zone the Subject Lands for medium-density and low-rise residential uses is consistent with the built and planned function and form of the surrounding community. There are large blocks of land with permissions for varied forms of townhomes, low-rise apartments and senior's care facilities in proximity to the site. The context of the site, designated as Neighbourhoods with frontage on a Civic Boulevard (Sunningdale Road East), warrants such zoning as has been requested through the subject application.

The north side of Sunningdale Road East in proximity to the Subject Lands is generally populated with low-rise buildings set back approximately 18-22 metres from the Sunningdale Road East street line through the provision of window streets (Waterwheel Road and Pleasantview Drive).

Preservation and enhancement of the existing ecological feature and functions associated with the PSW and Ballymote ESA is being implemented through the expansion of the OS5 zone and refinement of a future development limit.

Map 4 of The London Plan (Figure 12, p. 16 of this report) identifies a conceptual alignment of a future Cycling and Walking Route through the Subject Lands. The alignment would connect through the adjacent single family home parcels east and west of the Subject Lands to the existing Ballymote Trail within Subdivision 33M-631. The Ballymote Trail runs within a 10 metre buffer between the PSW/Ballymote Wetland ESA and Subdivision 33M-631 (yellow highlight on Figure 17 below).

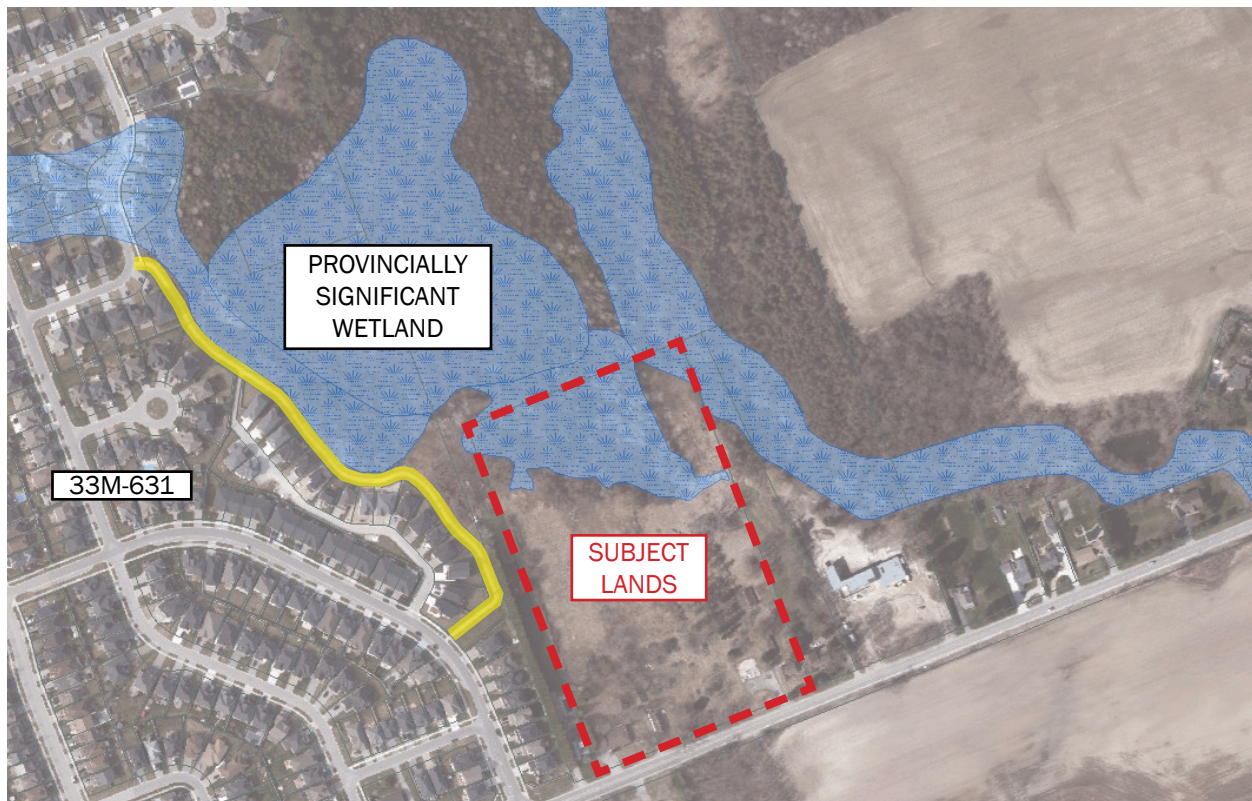


Figure 17: Ontario Ministry of Natural Resources and Forestry, Aerial Mapping - PSW and adjacent Ballymote Trail (yellow highlight)

The proposed OS5 zone limit provides for a buffer which, at its narrowest, is in excess of 15 metres in width. Most of the buffer ranges from 25-30 metres in width. Given the alignment of a potential trail shown on Map 4 of The London Plan, it is understood that the City intends to implement a trail corridor at the rear (north) of the site at some point in time, presumably when an opportunity arises to acquire lands from adjacent single-family homeowners. A future development application on the Subject Lands will necessitate discussion between the proponent and the City on the topics of parkland dedication and the creation of a trail network.

Given the construction of the Ballymote Trail within a 10 metre buffer separating low-rise development from the Arva Moraine Wetland Complex (PSW) / Ballymote Wetland ESA, the City should not have any spatial constraints in designing and constructing a trail within the proposed buffer on the Subject Lands should it choose to do so. The City would need to acquire the buffer and associated environmental feature from the landowner through a future development application in accordance with The Planning Act and The London Plan.

An archaeological assessment (January, 2019) was completed for the Subject Lands in 2019 by Lincoln Environmental Consulting, prior to the demolition of the four single family residences in 2021. The report, which was accepted by the Ministry, confirmed that there were no archaeological resources on site and that no further study was required. A copy of the report and associated Ministry clearance letter is included with this application.

The identification and clearance of the northern portion of the site for archaeological potential was conducted in accordance with Section 2.1.2.a. of the Standards and Guidelines for Consultant Archaeologists, 2011.

Applicable Policy from TLP - Place Type Policies

TLP 761_7: Provide for the protection of natural heritage features and areas which have been identified, studied and recognized by City Council as being of city-wide or regional significance, and/or by the Ministry of Northern Development, Mines, Natural Resources and Forestry as provincially significant.

TLP 918_2: Neighbourhoods will be planned for diversity and mix and should avoid the broad segregation of different housing types, intensities, and forms.

TLP 918_4: Housing forms will be encouraged that support the development of residential facilities that meet the housing needs of persons requiring special care.

TLP 918_12: Neighbourhoods will be designed to protect the Natural Heritage System, adding to the neighbourhood health, identity and sense of place.

TLP 918_13: Intensification will respect existing neighbourhood character and offer a level of certainty, while providing for strategic ways to accommodate development to improve our environment, support local businesses, enhance our physical and social health, and create dynamic, lively, and engaging places to live.

TLP 919_3. In conformity with tables 10 to 12 properties fronting onto major streets may allow for a broader range of uses and more intense forms of development than those fronting onto minor streets.

TLP 936_4: With the exception of properties located on Civic Boulevards or Urban Thoroughfares, large amounts of on-site parking will not be permitted on properties within the Neighbourhoods Place Type to accommodate the parking requirements of mixed-use buildings. Front yard parking will not be permitted on properties fronting a Neighbourhood Street or Neighbourhood Connector. The City Design policies of this Plan will provide direction for parking for other locations within the Neighbourhoods Place Type. On-street parking may be permitted to address parking requirements where it is demonstrated that there is capacity for such parking and it is appropriate and permitted.

TLP 938_: Residential intensification means the development of a property, site, or area at a higher residential density than currently exists. Intensification adds one or more residential units to a site, or creates one or more additional lots from an existing lot. The following policies relate to intensification on those lands that are within the Neighbourhoods Place Type.

Discussion of Place Type Policies

Given that the Subject Lands are designated as both Neighbourhoods and Green Space on Map 1 of The London Plan (Figure 9, p. 12 of this report), redevelopment of the previous four single family residences has been contemplated within London's policy framework. The subject application to establish final zoning for both environmental protection and residential development implements the policy direction and land use designations of The London Plan.

As is described in the EIS (April, 2024), the existing provincially significant wetland is to be preserved and protected through any future development application. This is to be secured through the refinement and expansion of the existing OS5 zone limit to include the buffer as recommended within the EIS.

The surrounding community is partially in transition with recent subdivision development to the west and future subdivision development to the south across Sunningdale Road East (39T-07502). Existing and approved land uses include a range of housing from low-rise, single family homes and townhomes up to 6 storey apartment buildings at densities up to 100 units per hectare. Abutting the site on both the east and west sides are existing single family homes. In this context, a medium density, low-rise residential form is warranted to increase densities while not overwhelming existing residential uses.

Given the Subject Lands frontage on a Civic Boulevard, access to transit, and proximity to a secondary school and district-scale community facility (Stoney Creek Community Centre), the proposed rezoning of the lands for low-rise, medium density residential uses is appropriate.

Applicable Policy from TLP - Environmental Policies

TLP 1332_: 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.

TLP 1390_: Development and site alteration shall not be permitted within a provincially significant wetland.

TLP 1393_: Development and site alteration shall not be permitted on adjacent lands to natural heritage features and areas until appropriate studies have been completed to satisfy provincial and municipal policy and the ecological function of adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural heritage features or on their ecological functions.

TLP 1413_: Ecological buffers will generally be required on lands contiguous to a specific natural heritage feature or area. Ecological buffer requirements shall be determined as part of an Environmental Impact Study.

TLP 1431_: Environmental impact studies are required to determine whether, or the extent to which, development may be permitted in areas within, or adjacent to, specific components of the Natural Heritage System. They will confirm or refine the boundaries of components of the Natural Heritage System, and will include conditions to ensure that development does not negatively impact the natural features and ecological functions for which the area is identified in accordance with the Environmental Management Guidelines.

TLP 1552_: For areas identified as significant groundwater recharge areas or Highly Vulnerable Aquifers on Map 6, a hydrological study may be required to determine the potential impacts of the proposed development on the quality and quantity of the groundwater resource as part of a planning or building permit application. This could result in a prohibition, restriction or other regulation on activities within these areas.

Discussion of Environmental Policies

The proposed rezoning of the Subject Lands will establish the limit of development for the Neighbourhoods Place Type and the limit of protected lands within the Green Space Place Type.

The natural heritage feature on site, being the PSW at the north end of the Subject Lands, was delineated using the Ontario Wetland Evaluation System on September 24, 2019 and a submission was made to the Province on December 24, 2019 to update provincial mapping. The Province responded in March of 2020 that they had accepted the findings of the updated evaluation and that mapping updates in Land Information Ontario would be made accordingly. The Province's online mapping now reflects the accurate boundary of the wetland. Correspondence relating to the evaluation process and approval by the Province is included within the EIS prepared by MTE (April, 2024).

A future development application should include an environmental implementation plan which describes the proposed development in detail to ensure that no impacts on the natural heritage features are being realized. The City may wish to implement a Holding (h) provision on the lands requiring an environmental implementation plan when a development application comes forward.

MTE Consultants has prepared an EIS (2024) for the ZBA application, confirming the limits of the PSW and outlining recommended mitigation measures for future development on the residential portion of the Subject Lands to ensure there are no negative impacts to the feature. The EIS prescribes the appropriate buffer to the PSW which is to be included in the OS5 zone. No residential development will be permitted within the OS5 zone, ensuring protection of the wetland and conformity with Municipal and Provincial policy.

Applicable Policy from TLP - Our Tools

TLP 1567_: The City will adopt a Growth Management Implementation Strategy (GMIS) to set a plan for staging growth and financing the required infrastructure. Within the context of the City's servicing master plans, the GMIS will plan for the orderly progression of development within the Urban Growth Boundary and the timely provision of infrastructure required to support fully serviced and functional communities and employment areas on a financially sustainable basis.

TLP 1570_: The GMIS will be prepared to meet the following objectives:

TLP 1570_5: Support growth in areas that are, or can be, served by existing infrastructure and existing public services and facilities.

TLP 1570_6: Focus growth in areas that have existing servicing capacity or comparatively lower costs for required infrastructure, rather than those that do not have available servicing capacity or are relatively expensive to service.

TLP 1570_9: Maintain, at all times, 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 of subdivision.

TLP 1570_13: Support the extension and use of transit services.

Discussion of Our Tools Policies

The Subject Lands, with the proposed rezoning for a variety of residential use permissions, will afford the City an opportunity to diversify housing supply and increase the number of available residential units within the City to be developed through intensification. These lands are identified in the 2024 GMIS as development lands with provision of services anticipated in 2025.

As confirmed within MTE's Preliminary Servicing Report (March, 2024), no downstream capacity upgrades are required to facilitate development of the lands. Once the lands are rezoned to implement the Place Type designations within The London Plan and services are extended to the site, the Subject Lands will become part of the City's Vacant Land Inventory for immediate development opportunities.

Summary of Analysis - The London Plan

The proposed ZBA will implement the existing Place Type designations on Map 1 of The London Plan. The Subject Lands, with frontage on a Civic Boulevard, are eligible for a broad range of residential land use permissions. The requested zone categories will allow flexibility in determining an ultimate use for the site as the surrounding community builds out.

The existing natural heritage feature on site, a PSW within the Arva Moraine Wetland Complex, is to be retained and protected through the introduction of a buffer as determined through an EIS (MTE, 2024).

The lands are within a 2 minute walking distance of a transit stop with access to schools and some of London's highest order commercial and recreational facilities. The intensification of residential lands within London is a priority of The London Plan. The proposed application for rezoning is in conformity with and implements The London Plan.

6.0 Response to Consultation Comments

6.1 Record of Pre-application Consultation, June, 2018

Summary of Major Issues Identified for Rezoning

- Development limit to be established/supported by EIS and hydrogeological study/water balance study
- Identify how lands can be serviced via internal road connections
- Demonstrate how the lands can be serviced by sanitary sewer
- Demonstrate compliance with SWM criteria and environmental targets identified within the Stoney Creek Subwatershed Study
- Requirement for minimum two storey building heights along Sunningdale Road East

Response to Issues Raised in 2018 Consultation Process

- EIS and hydrogeological reports as submitted with this application establish the development limit and confirm the suitability of the proposed zone limit for development of the Subject Lands.
- MTE's Preliminary Servicing Report (March, 2024) includes a functional servicing design of the Demonstration Plan which confirms serviceability of the block for a range of design outcomes based on varied zoning permissions.
- MTE has included brief commentary within their Preliminary Servicing Report (March, 2024) on the extension of sanitary services to the Subject Lands from the intersection of North Wenige Drive and Sunningdale Road East.
- MTE has included commentary within their Preliminary Servicing Report (March, 2024) regarding the requirements of the Stoney Creek Subwatershed Study (1995) and has confirmed compliance with the requirements of the subwatershed study.
- The requirement for minimum building heights along Sunningdale Road East are noted. The proposed zoning scheme for the site provides for a range of medium density housing forms and a future site plan application will be required to conform with the in-force policy framework at time of application.

6.2 Stage 2 Pre-Application Review, January 2024

6.2.1 City of London Heritage Planning

Staff are of the opinion that there is remaining archaeological potential on the Subject Lands

- The archaeological clearance letter from the Ministry confirmed the findings of the Stage 1-2 Report that there was no archaeological potential in the northern portion of the site given the wet conditions. Our archaeologist has provided a letter confirming this, a copy of which has been included in the ZBA submission package along with the report and Ministry clearance.

6.2.2 City of London Ecology Planning

Staff request site walk and SLSR

- Email from Britt O'Hagan (February 6, 2024) confirmed that the SLSR components could be satisfied within the EIS.

Staff suggest MECF consultation is required with respect to the completed Butternut Health Assessment (BHA)

- The BHA was submitted to the MNRF previously and was accepted. No further consultation required.

Questions regarding presence of Monarch habitat on site

- EIS confirms Monarch habitat is not present and that no Monarch species were encountered on 4 separate site visits.

Ecological buffers cannot be determined until the feature and its significance are confirmed through a SLSR

- The components of an SLSR are included within the EIS as directed by staff. Justification for the proposed buffer has been included within the EIS. Acknowledgment of need to reconfirm mitigation requirements for a specific development application when an application is submitted.

Staff position is that the proposed buffer does not conform with the EMGs, specifically the minimum buffers included within Table 5-2

- Table 5-2 minimum buffers are for a Focused EIS, the submission includes a Scoped EIS with justification for the width of the buffer.

6.2.3 Upper Thames River Conservation Authority (EIS)

Requirement to revise EIS based on latest comments from this round of consultation

- EIS has been updated to reflect comments from both the UTRCA and the City of London.

Development is generally not permitted within 30m of a PSW or wetland greater than 2 ha in size, UTRCA may consider this based on evaluation of alternative options and with understanding of the multi-use pathway that the City identifies on Map 4 of the London Plan, point out encroachment of a proposed unit on previous concept in the northeast corner of the site

- Approach has been to provide a 30m average buffer. Acknowledgement that the EIS does not consider alternative designs to the presented implementation plan given this is for a rezoning and not a development application. Pinch point in northeast corner is more generous in proposed zoning than the version to which the UTRCA was responding with this comment.

UTRCA believes the City will require a multi-use pathway through the site and potentially within the buffer.

- Future development application will require parkland dedication based on the specific application. Discussion of multi-use pathway in this area is included within the revised EIS.

Technical studies indicate a decrease in post-development infiltration and corresponding increase in runoff, questions about where specific design elements are to be located

- There are recommendations in the hydrogeological report for LID measures, to be designed and reviewed as part of a future development application.

Proposed wetland creation in the northeast corner of the subject lands would require detailed review by UTRCA

- No longer included in proposal.

6.2.4 Upper Thames River Conservation Authority (Hydrogeology)

There was confusion about data which did not correlate and suggestion that data may have been disorganized in the report with a request for a review and update if mistakes had been made in initial report.

- Confirmed that there had been mistakes in organizing the data and new report includes correct information to address the questions/confusion of UTRCA reviewer.

Request inclusion of temperature data to better interpret trends in groundwater levels.

- Updates made to report to include this data.

Questions regarding presence of a headwater feature on site.

- Hydrogeological response is that this has been addressed in EIS. EIS confirms no headwater feature on site.

Request for installation descriptions for piezometers on site as well as borehole logs.

- Details added to report. No soil sampling was conducted on site with the installation of the piezometers, but field notes regarding soil qualities are now included in the report.

Note that the soil samples taken on site cannot be used for water taking calculations from the shallow aquifer or for infiltration estimates.

- Acknowledged that detailed calculations regarding water taking from the discontinuous upper confined aquifer has not been completed and that infiltration testing has not been completed for this application.

Questions regarding interactions between surface water in the wetland and shallow groundwater, and requested to analyze piezometers within groundwater and surface water to compare the chemical signature of each.

- Surface water and shallow groundwater elevations were similar through the winter and spring months with drier conditions in the summer showing reduced groundwater levels. A new section has been added to the report regarding groundwater flows to the wetland. and chemical signatures of water samples are discussed in Section 4.7 of the hydrogeological report.

Conflicting information on plans and in reports regarding the setback/buffer to be established between the wetland and residential lands.

- A new concept plan is included in the updated report showing a buffer ranging from approximately 15m to 37.5m.

Request for additional information regarding groundwater flows and questions regarding the methodology to determine groundwater flow direction in the shallow unconfined aquifer.

- Groundwater flow drawings have been included in the updated report. A new section has been included in the hydrogeological report to address this comment (4.4.1)

Request for a wetland risk assessment.

- A wetland risk assessment is now included in the hydrogeological report as section 6.0.

Request for maps illustrating pre- and post-development scenarios illustrating catchment areas.

- These have been added to the revised report.

Request to address shallow groundwater contribution to the wetland.

- Section 4.5.1 of the hydrogeological report includes information on this topic.

Discussion of natural features and an impact assessment for the headwater feature for Stoney Creek not included in report. Request to update report to include this.

- It has been confirmed with the ecology consulting team that there is no headwater drainage feature on this Site, nor was it identified in any scoping discussions with the City or UTRCA

Discussion of the impact assessment is missing the potential to impact adjacent water supply wells.

- Section 7.1 of the hydrogeological report includes an assessment of local supply wells. The presence and use of two wells with unknown status should be confirmed prior to development.

Requirement for a wetland monitoring and mitigation plan as part of the submission.

- As this is a zoning application rather than a development application, this is not included in the hydrogeological report.

Requirement for water balance assessment as part of complete application and shall demonstrate how deficit in infiltration will be compensated for.

- The water balance has been updated with details included in the Functional Servicing Report prepared by MTE (March, 2024).

Note that the SWM report should consider and incorporate the proposed LID measures referenced in the hydrogeological report.

- SWM strategies to be finalized at the detailed design stage of a development application.

Questions regarding proposed wetland enhancement/creation proposed in previous iteration of the report.

- No longer proposed.

Request for more information on catchment areas for water balance in pre- and post-development conditions.

- As discussed previously these have now been included in report.

7.0 Supporting Studies

The following studies have been prepared in support of the application for rezoning:

- Preliminary Servicing Report - MTE Consultants (March, 2024)
- Environmental Impact Study - MTE Consultants (April, 2024)
- Stage 1-2 Archaeological Assessment - Lincoln Environmental Consulting (January, 2019)
- Hydrogeological Assessment - EXP (April, 2024)

Concluding statements from the above reports are included in this section.

7.1 Preliminary Servicing Report Summary (MTE, March 2024)

The proposed site is a residential development located within the Stoney Creek subwatershed in North London.

Water servicing is available from the existing 1200mm water main on Sunningdale Road and adequate pressure and flow is available for both domestic and fire suppression purposes.

The site was allocated for in the design of the downstream sanitary sewers and the proposed density of development does not exceed the population allocated for in the sewer design. An extension of the trunk sanitary sewer will be required to service the site.

Stormwater management can be completed on-site and runoff from the majority of the site will be released to the northeast. Allocation for a portion of the site was provided for in the design of the storm sewers on South Wenige Drive. Stormwater management controls will be provided in keeping with the targets identified in the Stoney Creek Subwatershed Report.

Final servicing will be analyzed and detailed in full as part of the detailed design process

7.2 Environmental Impact Study Summary (MTE, March 2024)

Auburn Homes Inc. (the Proponent) is proposing a Zoning By-Law Amendment at 1338, 1352, 1376, and 1388 Sunningdale Road East, near the northeast intersection of North Wenige Drive and Sunningdale Road East in the City of London. The south Subject Lands are proposed to be re-zoned for future residential development, with the remaining north area to be re-zoned OS5 for the protection of the natural heritage system.

The proposed zoning avoids direct impact to the features and functions of the Arva Moraine PSW and Ballymote Wetland ESA at the north edge of the Subject Lands. A revision of the Ballymote Wetland ESA boundary and update of the PSW boundary are recommended

for the City of London. The evaluation of natural heritage features in this EIS support the proposed zoning limit. Mitigation measures (e.g., naturalized buffer, fencing, vegetation removal timing, bat habitat compensation, ESC fencing, public education) have been recommended in this EIS to protect the adjacent natural heritage features from direct and indirect impacts of future residential development within the re-zoned area. These recommendations should be reviewed at the site plan stage, with any updates being provided in an EMP. Water balance requirements are discussed in the Hydrogeological Assessment Report (EXP, 2024) and recommended mitigation strategies should be followed to maintain infiltration and water quality to the PSW. The PSW, ESA, and buffer will be protected for the long term as Open Space (OS5).

This EIS has set out recommendations to protect the adjacent significant natural heritage features from indirect and direct impacts. Provided these are met, it is our opinion that the proposed development can proceed.

7.3 Stage 1-2 Archaeological Assessment Summary (LECC, January 2019)

The Stage 2 archaeological assessment was carried out in accordance with the Ministry of Tourism, Culture, and Sport's Standards and Guidelines for Consultant Archaeologists (Government of Ontario 2011). Roughly 50% of the study area consists of overgrown manicured lawn, overgrown meadow, and woodlot and was subject to test pit survey at 5-metre intervals in accordance with Section 2.1.1 of the MTCS' 2011 Standards and Guidelines for Consultant Archaeologists (Government of Ontario 2011).

Approximately 10% of the study area consisted of visual disturbance. These areas were not deemed to retain archaeological potential and were subject to photographic documentation. Approximately 40% of the study area consisted of low lying and wet woodlot and overgrown meadow. These areas were not deemed to retain archaeological potential and were subject to photographic documentation.

The Stage 2 assessment did not result in the identification of any archaeological resources.

7.4 Hydrogeological Assessment (EXP, April 2024)

EXP Services Inc. (EXP) was retained by Auburn Homes Inc. (Auburn) to conduct a Hydrogeological Assessment on to the proposed Applewood Hills Subdivision development to be located at 1338 to 1388 Sunningdale Road in London, Ontario. The proposed development is to include medium density residential townhomes, all constructed as slab on grade.

The objective of the Hydrogeological Assessment was to examine the hydrogeological characteristics of the Site by reviewing the MECP well records and reviewing the soils and groundwater information provided from a series of sampled boreholes, monitoring wells, and surface water stations completed at the Site. It is understood that the Hydrogeological Assessment will be submitted for review and approval by the City of London (the City) and the Upper Thames River Conservation Authority (UTRCA). This report provides results of the investigation completed on Site from November 2018 to July 2021.

Based on the results of the Hydrogeological Assessment, the following findings are presented:

- The site hydro-stratigraphy interpreted from the borehole drilling program generally consists of a thin layer of silty sand overlying a thick sequence of clayey silt till, and underlain by sandy silt in the southwest portion of the Site;
- The Ballymote Wetland Environmentally Significant Area (ESA) is located in the northern portion of the Site and extends to the north and to the southeast. This ESA area contains a Provincially Significant Wetland (PSW) which is partially located in the northern portion of the Site. The Ballymote Tributary flows through the wetland area to the southeast and crosses Sunningdale Road East, flowing south towards Stoney Creek;
- Surficial runoff from the Site is expected to follow topography and drain towards the east and
- connect with the existing water course (Ballymote Tributary to Stoney Creek);
- Groundwater elevations are generally higher in the southern portion of the Site and are perched within a silty sand shallow aquifer. Artesian conditions are noted in the eastern portion of the Site;
- Single Well Response Tests (SWRTs) were carried out in BH3/MW and BH4/MW and resulted in an estimated hydraulic conductivity ranging from 2.7×10^{-6} m/s in the underlying sandy silt and 2.1×10^{-8} m/s in the underlying silt;
- Potable wells in the area are typically sourced from intermediate and deep overburden aquifers. Three shallow wells used for domestic water supply were identified within 500 m of the Site and one was confirmed to still be in use. A well survey to identify any shallow wells was completed with seven (7) responses received to date;
- The clayey silt till deposits found near surface have a very low permeability and act as an effective barrier to minimize vertical groundwater movement. The water supply wells in the area that are screened into deeper overburden formations are not expected to be impacted by construction of site services or typical excavations associated with the residential development of the site;
- At this time it is assumed that all construction will be slab on grade with limited excavations required during the residential housing construction. Dewatering requirements will be assessed in the detailed design stage;
- Water balance volumes indicate some Low Impact Development (LID) strategies will be required to balance the post-development infiltration rates on Site;
- The Site is outside of any designated Significant Groundwater Recharge Area (SGRA) but within a Highly Vulnerable Aquifer (HVA);

- The use of best management practices and spill contingency plans will assist in minimizing potential impacts to the groundwater at the Site; and,
- Groundwater and surface water samples collected on Site show different chemical signatures, indicating minimal surface water-groundwater interaction is occurring between the deeper confined aquifers on Site and the surface water within the natural features.

8.0 Summary of Planning Analysis

The proposed ZBA application to zone the lands for a range of residential use permissions which can all be classified as medium density in a low rise form is in conformity with the Provincial Policy Statement and The London Plan.

The technical studies accompanying this report within the Complete Application package have confirmed that the proposed zoning to accommodate low rise medium density housing can be implemented on the Subject Lands without issue.

A demonstration plan has been included as Figure 17 on the following page as an example of how the site may develop following implementation of the requested rezoning.

A future development application will potentially require updates and/or additional technical studies to demonstrate suitability on the site and compliance with any policy changes of the day.

No development application is being advanced at this stage by the landowner. Through evaluation of this application, the City may find it advantageous to establish additional Holding (h) zone categories for the site to ensure suitable development occurs on the subject lands.



SUNNINGDALE ROAD EAST

Figure 18: Demonstration Plan, 1338-1388 Sunningdale Road East