
1782 KILALLY RD

PLANNING JUSTIFICATION & DESIGN REPORT

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1. INTRODUCTION

This Planning Justification & Design Report (PJDR) is being submitted by Drewlo Holdings Inc. to support Draft Plan of Subdivision (DP) and combined Official Plan/Zoning By-law Amendment (OPA/ZBA) applications for the property located on the north side of Kilally Road between Highbury Avenue North and Clarke Road; known municipally as 1782 Kilally Road and known legally as Part of Lot 7, Concession 4 (Geographic Township of London) and Part of Lots 10 and 17, Registered Plan No. 91 in the City of London, County of Middlesex.

The applications are being submitted to facilitate a plan of subdivision consisting of 225 single detached lots, three (3) medium density residential blocks, five (5) streets, a park block, walkway blocks, open space block, and five (5) blocks for to satisfy 0.3m reserves and road widening. The proposal is consistent with the intentions of the area, and supportive of Provincial and Municipal policies.

1.1. OVERVIEW

The “subject lands”, municipally known as 1782 Kilally Road, have frontage along Kilally Road, and are connected to an existing subdivision to the west via Agathos Street. They are bordered to the north by an Environmentally Sensitive Area (ESA) and the Thames River. The subject lands are 36.752ha (90.8162ac) in size, with an approximate frontage of 686.03m (2,250.76ft) along Kilally Road; roughly 22.281ha (55.0576ac) is considered developable land.

1782 Kilally Road is located within the Neighbourhoods Place Type of the London Plan, which allows for a variety of land uses ranging from single detached dwellings to low-rise apartment buildings. Majority of the Lands are zoned Urban Reserve (UR4); a portion of the lands associated with the ESA along the north portion are zoned Open Space (OS5). Lands to the north, corresponding to the ESA and Thames River are within the Green Space and Environmental Review Place Types.

The proposal seeks draft plan of subdivision approval for 225 single detached lots, three (3) medium density blocks, an open space block, road widening block, multiple 0.3m reserve blocks, three (3) walkway blocks and a park block. A combined official plan and zoning by-law amendment request is also being sought to support the proposed development.

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2. PLANNING FRAMEWORK

2.1. THE LONDON PLAN

1782 Kilally Road is located within the Neighbourhood Place Type, with Green Space and Environmental Review designations applying to the ESA feature along the north boundary of the property. Surrounding lands also fall within the Neighbourhoods Place Type.

The subject lands are located along Kilally Road which is classified by Map 2 as a Civic Boulevard. A cycling/walking route is contemplated by Map 4 along the Thames River, connecting to the existing Thames Valley Parkway (TVP) to the west.

On Map 5, Unevaluated Wetland features are shown in the southwest corner of the property. The “Kilally Forest ESA” is also shown, corresponding to the Green Space Place Type designation on Map 1. An Unevaluated Vegetation Patch slightly extends from the east, consistent with the Environmental Review designation on Map 1. Two (2) Potential Naturalization Areas are also shown.

As shown on Map 6, the area is within a Significant Groundwater Recharge Area and an area considered to contain Highly Vulnerable Aquifers. A portion of the site is shown to be regulated by the Conservation Authority (discussed in further detail under Section 3.3) with hazard and regulatory flood lines potentially impacting the property.

The subject lands are not associated with any Specific Policy Areas (Map 7), Community Improvement Project Areas (Map 8), or Heritage Conservation Districts and Cultural Heritage Landscapes (Map 9), and are not located within a PMTSA (Map 10).

The proposed Official Plan Amendment seeks to remove the area designated Environmental Review and to align the limits of the Neighbourhoods/Green Space Place Type with the proposed development limit, consistent with the findings of the Environmental Impact Study (EIS).

2.2. ZONING BY-LAW

Under the City of London Zoning By-law (Z.-1), the subject lands are currently zoned “Urban Reserve (UR4)” and “Open Space (OS5)”. The proposed development will require a Zoning By-law amendment to permit the proposed land uses, heights and densities consistent with the policies of the Neighbourhood Place Type as per the London Plan.

The proposed zoning will permit uses such as low density residential (single detached dwellings) and medium density residential (cluster and stacked townhomes, and low-rise apartment buildings), while implementing additional height and density permissions.

The UR4 (Urban Reserve) zone variation is applied to areas which have not completed the Community Plan process which are intended for residential development over the long term.

As outlined in Section 5.4 the Kilally South Area Plan was completed in 2003. The proposed Zoning By-law Amendment seeks to replace the UR4 zone to facilitate residential development consistent with the direction of the Kilally South Area Plan.

The OS5 (Open Space) is one of the most restrictive open space zone variations and is applied to hazard lands. It is proposed that the area of the OS5 zone be expanded to match the extent of the lands defined by the Draft Plan as open space.

3. SITE LOCATION AND SURROUNDING USES

3.1. SITE DESCRIPTION AND CONTEXTUAL ANALYSIS

1782 Kilally Road is located in the north eastern part of the City of London and is bordered by the Thames River to the north, existing residential development to the West (33M-757) and future development/natural heritage features to the east; it is north of Kilally Road, roughly situated between Webster Street and Sandford Street. The site is currently vacant.

The Site is irregular in shape and is approximately 36.752ha (90.8162ac) in size, with roughly 690m (2,263.78ft) of frontage along Kilally Road. The proposed development occupies approximately 22.281ha (55.0576ac). The existing natural area, equating to approximately 14.471ha (35.7586ac), along the north boundary will remain. The topography across the site is variable but generally slopes to the north.



Adjacent land uses are as follows:

- NORTH** Kilally Woodland ESA, Thames River; beyond the Thames River is existing residential development known as the Cedar Hollow Subdivision which extends to Fanshawe Park Road East;
- EAST** MN #1840 Kilally Road; previous guest quarters for the adjacent estate (MN# 1880 Kilally Road) known as 'The Spinney'. Based on City information and the indications of the Kilally South Area Plan, MN# 1840 Kilally Road does not hold heritage value/interest;
- SOUTH** vacant, future development lands (owned by Drewlo Holdings Inc.) and MN#1745 Kilally Road a listed heritage resource;
- WEST** existing residential development (33M-757), more commonly referred to as "Kilally on the Thames, Phase 1".

3.2. SPATIAL ANALYSIS

Lands within 400m of 1782 Kilally Road are designated for varying forms and scales of development.

Lands to the west include Phase 1 of the Kilally on the Thames subdivision (33M-757), this includes 130 single detached lots, a townhome development at 177 Edgevalley Road, developing low-rise apartment buildings (475 & 480 Edgevalley Road), and high-rise purpose-built apartment building currently under construction at 170 Edgevalley Road.

Lands to the north include the Thames River corridor and the Cedar Hollow development, including Cedar Hollow Public School. To the north east, lands are zoned for future extraction activities. While 1885 Fanshawe Park Road East is located within 400m of the property limits for 1782 Kilally Road, it is more than 450m away from the proposed development limit.

To the east is 1840 Kilally Road, surrounded by existing natural heritage areas, and 1880 Kilally Road, which is a designated heritage property.

Lands to the south are predominantly farmland/future residential development with the exception of the designated heritage property municipally known as 1745 Kilally Road.

Within 800m of the proposed development is more low density residential to the north and west, additional farmland/future development lands to the southeast, highway commercial uses along Highbury Avenue North, the Agriculture and Agri-food Canada London Research and Development Centre located at 1391 Sandford Street, and active extraction activities on the property municipally known as 1865 Clarke Road.

3.3. UTRCA REGULATION

The UTRCA regulates lands within its watershed under Ontario Regulation 157/06, pursuant to Section 28 of the *Conservation Authorities Act*. The UTRCA has jurisdiction over riverine flooding and erosion hazards, wetlands and the surrounding area, and requires that landowners obtain written approval from the Authority prior to undertaking any site alteration or development within the regulation limit.

A Section 28 Permit will be required to support the proposed development.

3.4. ARCHAEOLOGICAL/BUILT HERITAGE

As discussed in Section 5.3.1, the City of London's Archaeological Management Plan (Figure 5: Composite Archaeological Potential Layer, Archaeological Management Plan, 2017) indicates that this area has been 'cleared of Archaeological Concern'.

Archaeological potential for the subject property and lands to the west (3M-757) were evaluated through Stage 1 and 2, Stage 3 and Stage 4 investigations completed in October 2003, June 2004 and August 2006, respectively. In January 2007, the Ministry reviewed the assessments and provided a clearance letter for the work completed; they agreed with the report(s) findings that no additional work for the subject lands was required.

Copies of the completed reports and Ministry clearance were provided to the City (via email) on November 30, 2020 and October 28, 2020, respectively.

4. DESCRIPTION OF PROPOSAL

The proposed subdivision consists of 225 single detached residential lots, three (3) medium density residential blocks, one (1) park block, three (3) walkway blocks, one (1) open space block, four (4) 0.3m reserve blocks and one (1) road widening block. Proposed single detached dwellings are consistent with the size and form of the development (33M-757) to the west.

Agathos Street is proposed to extend into the development, bending north and then continuing east to service future development on the adjacent parcel of land. Four (4) new local streets are being proposed, creating two access points along Kilally Road.

Existing service connections are available for sanitary, storm and water. Sanitary connections are provided via proposed Block 229 and storm via proposed Block 230.

4.1. PRE-APPLICATION CONSULTATION

A pre-application consultation meeting took place with City of London Staff on September 16, 2020.

4.2. PROPOSED OFFICIAL PLAN AMENDMENT (OPA)

An Official Plan Amendment (OPA) is being sought to remove the area designated Environmental Review consistent with the findings of the submitted EIS, and to modify the Neighbourhoods and Green Space Place Types to reflect the proposed development limit.

It is requested that the Neighbourhoods Place Type be extended slightly to match the proposed development limit.



4.3. PROPOSED ZONING BY-LAW AMENDMENT (ZBA)

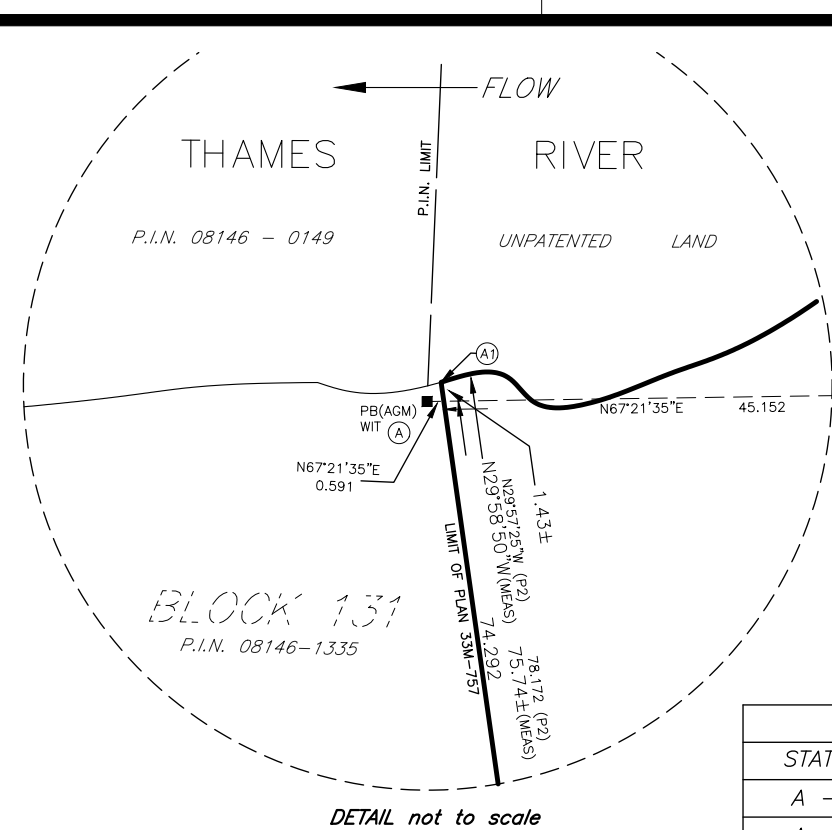
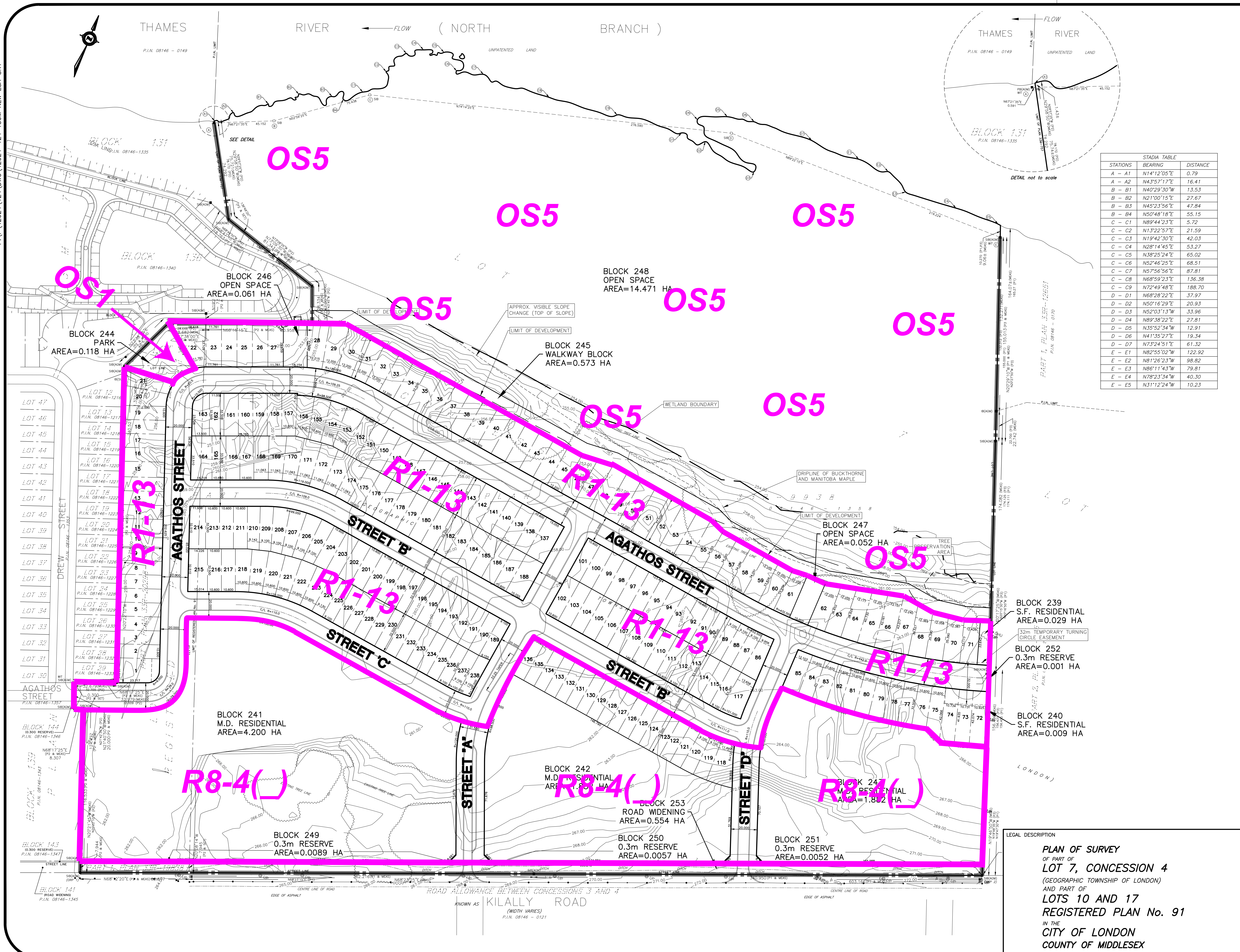
A Zoning By-law Amendment (ZBA) is being requested to facilitate the proposed development consistent with the permissions of the London Plan. The proposed zoning will permit uses such as low density residential (single detached dwellings) and medium density residential (townhomes, stacked townhomes, low-rise apartments), as well as properly reflect the extents of the proposed natural area.

Under the City of London Zoning By-law (Z.-1), the subject lands are currently zoned “Urban Reserve (UR4)” and “Open Space (OS5)”.

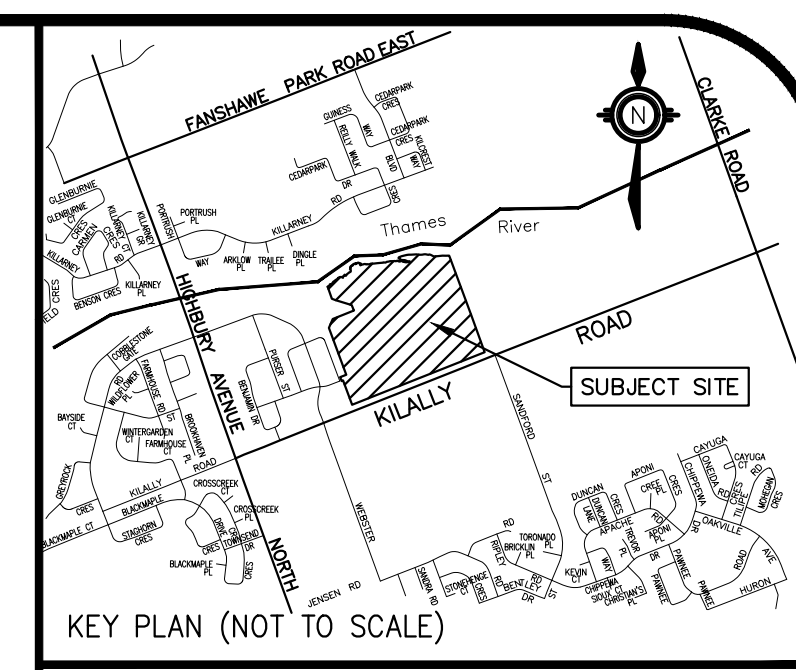
The following zones are being requested:

- Residential R1-13 Zone Variation;
- A special provision of the Residential R8-4(□) Zone Variation; and
- Open Space Zones (OS5 and OS1).

Limits of the Proposed Zones are depicted below. Details of the zone regulations are further discussed below.



STATIONS	BEARING	DISTANCE
A - A1	N14°12'05"E	0.79
A - A2	N43°57'17"E	16.41
B - B1	N40°29'30"W	13.53
B - B2	N21°00'15"E	27.67
B - B3	N45°23'56"E	47.84
B - B4	N50°48'18"E	55.15
C - C1	N89°44'23"E	5.72
C - C2	N13°22'57"E	21.59
C - C3	N19°42'30"E	42.03
C - C4	N28°14'45"E	53.27
C - C5	N38°25'24"E	65.02
C - C6	N52°46'25"E	68.51
C - C7	N57°56'56"E	87.81
C - C8	N68°59'23"E	136.38
C - C9	N72°49'48"E	188.70
D - D1	N68°28'22"E	37.97
D - D2	N50°16'29"E	20.93
D - D3	N52°03'13"W	33.96
D - D4	N89°38'22"E	27.81
D - D5	N35°52'34"W	12.91
D - D6	N41°35'27"E	19.34
D - D7	N73°24'51"E	61.32
E - E1	N82°55'02"W	122.92
E - E2	N81°26'23"W	98.82
E - E3	N86°11'43"W	79.81
E - E4	N78°23'34"W	40.30
E - E5	N31°12'24"W	10.23



OWNER'S CERTIFICATE
 I HEREBY AUTHORIZE:
 MTE CONSULTANTS INC.
 TO PREPARE AND SUBMIT THIS DRAFT PLAN
 OF SUBDIVISION TO THE CITY OF LONDON

ALLAN DREWLO DATE _____
 DREWLO HOLDINGS INC.

SURVEYOR'S CERTIFICATE
 WE HEREBY CERTIFY THAT THE BOUNDARIES OF THE LANDS
 TO BE SUBDIVIDED, AS SHOWN ON THE PLAN, AND
 THEIR RELATIONSHIP TO ADJACENT LANDS ARE
 ACCURATELY AND CORRECTLY SHOWN.

PATRICK LEVAC DATE _____
 ONTARIO LAND SURVEYOR
 MTE OLS LTD.

REQUIREMENTS OF SECTION 51(17) OF THE PLANNING ACT

(A) SEE PLAN	(E) SEE PLAN	(I) SLOPE LOAD
(B) SEE PLAN	(F) SEE PLAN	(J) SOIL POROSITY
(C) SEE PLAN	(G) SEE PLAN	(K) FULL MUNICIPAL SERVICES
(D) SEE PLAN	(H) MUNICIPAL WATER	(L) NONE

	(IN Ha)
LOTS 1-238 - SINGLE FAMILY RESIDENTIAL	8.692 ha
BLOCKS 239, 240 - SINGLE FAMILY RESIDENTIAL	0.038 ha
BLOCKS 241-243 - MED. DENSITY RESIDENTIAL	7.964 ha
BLOCK 244 - PARK	0.118 ha
BLOCK 245 - WALKWAY BLOCK	0.573 ha
BLOCKS 246-248 - OPEN SPACE	14.584 ha
BLOCKS 249-252 - 0.3m RESERVE	0.021 ha
BLOCK 253 - ROAD WIDENING	0.554 ha
ROADS	4.208 ha
TOTAL	36.752 ha

No.	REVISION	BY	DATE
6.			
5.			
4.			
3.			
2.			
1.			

City of London

MTE
 Engineers, Scientists, Surveyors

519-204-6510 www.mte85.com

OWNER: DREWLO HOLDINGS INC.

PROJECT: EDGEVALLEY SUBDIVISION PHASE 2 LONDON ONTARIO

Proposed Zoning

Project Manager	JPF	Project No.	42024-124
Design By	MTE	Checked By	
Drawn By	MTE	Checked By	
Surveyed By	MTE	Drawing No.	
Date	MAR/22		DP1
Scale	1:1250	Sheet 1 of 1	

LEGAL DESCRIPTION

PLAN OF SURVEY
 OF PART OF
LOT 7, CONCESSION 4
 (GEOGRAPHIC TOWNSHIP OF LONDON)
 AND PART OF
LOTS 10 AND 17
REGISTERED PLAN No. 91
 IN THE
CITY OF LONDON
COUNTY OF MIDDLESEX

PROPOSED R1-13 ZONE VARIATION

It is requested that Lots 1-225 be zoned R1-13. No special provisions are being requested.

The R1 Residential zone provides for and regulates single detached dwellings. The R1-13 zone deals with smaller lots in suburban areas of the City.

BY-LAW RESTRICTIONS	REQUIRED (PROPOSED ZONE)	AS SHOWN ON PLAN
(a) Use	A single detached dwelling	Single detached dwelling
(b) Lot Area (m ²) Min	270m ²	270m ²
(c) Lot Frontage (m) Min	9.0m	9.0m
(d) Front Yard Depth (m) Main Building/Garage (m) Min	To Local Street/Secondary Collector... 4.5m / 6.0m	Neighbourhood Street... 4.5m / 6.0m
(e) Rear Yard Depth (m) Min	7.0m	7.0m
(f) Interior Yard Depth (m) Min	1.2m	1.2m
(g) Exterior Yard Depth (m) Min	To Local Street/Secondary Collector... 4.5m / 6.0m	Neighbourhood Street... 4.5m / 6.0m
(h) Lot Coverage (%) Max	45%	45%
(i) Landscape Open Space (% Min)	30%	30%
(j) Height (m) Max	9.0m	9.0m
(k) Off-street Parking Min (rate/number)	1 per unit	1 per unit
(l) Bicycle parking Min (rate/number)	N.A.	N.A.
(m) Parking Area Coverage (%) Max	25%	25%

 PROPOSED SPECIAL PROVISION OF R8-4 VARIATION

The R8 Residential Zone provides for an regulates medium density development in the form of low-rise apartment buildings.

BY-LAW RESTRICTIONS	REQUIRED (PROPOSED ZONE)	AS SHOWN ON PLAN
(a) Use	a) Apartment buildings b) Handicapped person's apartment buildings c) Logging house class 2 d) Stacked townhousing e) Senior citizen apartment buildings f) Emergency care establishments g) Continuum-of-care facilities	a) Apartment buildings b) Handicapped person's apartment buildings c) Logging house class 2 d) Stacked townhousing e) Senior citizen apartment buildings f) Emergency care establishments g) Continuum-of-care facilities h) Townhouse
(b) Lot Area (m ²) Min	1,000m ²	1,000m ²
(c) Lot Frontage (m) Min	30m	30m
(d) Front Yard Depth (m) Main Building/Garage (m) Min	6m plus 1m per 10m of main building height or fraction thereof above the first 3m	2.0m minimum 6.0m maximum
(e) Rear Yard Depth (m) Min (f) Interior Yard Depth (m) Min	1.2m per 3m of main building height or fraction thereof above 3m but in no case less than 4.5m	1.2m per 3m of main building height or fraction thereof above 3m but in no case less than 4.5m
(g) Exterior Yard Depth (m) Min	6m plus 1m per 10m of main building height or fraction thereof above the first 3m	6m plus 1m per 10m of main building height or fraction thereof above the first 3m
(h) Lot Coverage (%) Max	40%	40%
(i) Landscape Open Space (% Min)	30%	25%
(j) Height (m) Max	13.0m	22.0m (72.2 ft)
(k) Off-street Parking Min (rate/number)	0.5 per apartment unit 1 per townhouse, cluster unit 1 per stacked townhouse unit	0.5 per apartment unit 1 per townhouse, cluster unit 1 per stacked townhouse unit
(l) Bicycle parking Min (rate/number)	Apartment: 0.9 long-term spaces per unit, 0.1 short-term spaces per unit Townhouses: 0.1 short-term spaces per unit	Apartment: 0.9 long-term spaces per unit, 0.1 short-term spaces per unit Townhouses: 0.1 short-term spaces per unit

(m) Parking Area Coverage (%) Max	N.A.	N.A.
(n) Density Max (rate/number)	75 upha	100 upha

It is requested that Block 226, 227 and 228 be zoned R8-4(), with special provisions:

- to add Townhouses as a permitted use;
- to establish Kilally Road as the front yard;
- to establish a front yard depth of 2.0m (minimum) and 6.0m (maximum);
- to establish a landscape open space (minimum) requirement of 25%;
- to establish a maximum height of 22.0m (72.2 ft); and
- to establish a maximum density of 100 units per hectare.

R8-4() Block 226, 227 & 228

- a) The front lot line is considered to be Kilally Road for the purpose of development.
- b) No parking is to be permitted within the front and exterior side yard in front of any proposed buildings.
- c) Additional Permitted Use:
 - i. Cluster Townhouse Dwelling
- d) Regulations
 - i. Front Yard Depth (m):

(Minimum)	2.0m
(Maximum)	6.0m
 - ii. Landscape Open Space (%):

(Minimum)	25%
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 - iii. Height:

(Maximum)	22.0m (72.2ft)
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 - iv. Density:

(Maximum)	100 upha
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PROPOSED OPEN SPACE ZONES

It is proposed that Block 233 will be zoned OS5. The OS5 zone is applied 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.

It is proposed that Block 229 will be zoned OS1. The OS1 zone is intended to be applied to areas located outside of conservation lands (hazard lands, floodplain and steep slopes) and areas which are not environmentally significant, and is typically applied to City and private parks with no or few structures.

4.4. SUPPORTING STUDIES

ENVIRONMENTAL IMPACT STUDY

MTE Consultants Inc. have prepared an Environmental Impact Study (EIS), dated June 27, 2022. The report evaluates the potential for impacts to natural heritage features and functions to result from the Project, and provides recommendations for avoidance or mitigation of impacts, potential restoration and enhancement measures, and a monitoring program to protect significant natural heritage features and functions.

It is concluded that the proposed development avoids direct impact to the features and functions of the significant natural heritage features, including the Kilally Forest ESA, as well as the species and habitat associate with this feature. Appropriate setbacks and buffers have been recommended to mitigate indirect impacts to the adjacent natural heritage features. Buffer area should be landscaped with native species to establish enhanced buffers and provide additional wildlife habitat. Three small disturbed wetland communities within the Subject Lands are proposed for removal, and off-site wetland creation/enhancement along with invasive species management in the ESA is recommended as compensation.

The EIS sets out recommendations to protect the adjacent significant natural heritage features from indirect impacts, such as erosion and sediment control measures. Ultimately, it was concluded that so long as the recommendations are followed, the proposed development can proceed.

WATER DISTRIBUTION ANALYSIS

MTE Consultants Inc. have prepared a Water Distribution Analysis, dated January 24, 2024, to complete a preliminary Water Distribution Analysis in support of the Plan of Subdivision.

It concluded and recommended the following:

1. Connections to the proposed City's watermains will adequately service the proposed water distribution network for the proposed Edgevalley Phase 2 Subdivision. It is expected that the future 400mm diameter watermain extension will be undertaken within the next year prior to servicing the Subject Lands.
2. The proposed water distribution network will provide system pressures within the respective pressure guidelines and will not require pressure reducing valves.
3. Water model results indicate that the proposed water distribution system will adequately provide the recommended fire flows at the minimum MECP pressure of 140kPa.
4. Pipe velocities were less than the City's allowable maximum of 1.5m/s for all domestic scenarios. Under fire flow conditions minor exceedances of the City's maximum criteria of 2.4m/s were modelled however these exceedances are not considered significant.
5. It is recommended that flushing be completed in accordance with the recommended flushing volumes and locations noted herein during buildout of the subdivision. Under full buildout condition there will be sufficient demand to provide quality turnover for the site.

STORMWATER SERVICING (SWM) REPORT

MTE Consultants Inc. have prepared a preliminary Stormwater Management report, dated January 25, 2024, to review preliminary stormwater management design for Phase 2 of the Edgevalley Subdivision.

It was concluded that:

- i. Quantity control for the Phase 2 lands will only be required for the medium density blocks to control to levels accounted for in the design of the existing regional SWM Facility;
- ii. Quality control for the development is provided by the existing SWM facility;
- iii. The post-development infiltration deficit for the site can be mitigated by implementing active infiltration measures within the proposed medium density development blocks, passive measures can be applied within the residential lots and City right of ways to provide further mitigation.

It was recommended that:

- i. The site grading and erosion control measures be fully detailed as part of the detailed design stage of the development process;
- ii. The final design and conveyance capacity for Block 230 be finalized as part of the detailed design process; and
- iii. The block level infiltration measures be detailed at the time of site plan approval.

HYDROGEOLOGICAL INVESTIGATION REPORT

A Hydrogeological Assessment and Water Balance report was completed by EXP Services Inc., dated April 7, 2022, to assess the hydrogeological characteristics of the Site, including soil conditions, groundwater flow and quality, as well as an assessment of potential impacts to the groundwater as a result of the proposed development.

In addition to the Water Balance discussion with the Preliminary Stormwater Management Report, a Water Balance Assessment is provided in Section 5 of the EXP report.

The following findings were presented in the Hydrogeological Assessment and Water Balance Report:

- The proposed development Site is located 200m south of the Thames River in The Forks sub-watershed;
- Topography across the Site is variable but generally slopes to the north. Shallow groundwater flow is to the north-northwest across the Site;
- The Site is generally covered with surficial layers of fill, sand, and/or sand and gravel overlying a thick sequence of clayey silt till. An underlying confined sand and gravel unit is found at depth underlying the thick till unit;
- An upper aquifer within the overlying sand/sand and gravel unit is found primarily within the easter area of the Site. This upper aquifer is found discharging along the slop located along the northern edge of the development Site;

- Groundwater levels were found to be above ground surface in a number of the piezometers on the Site, and closest to ground surface at BH8/MW where they ranged from 1.92 to 3.02 mbgs;
- MTE identified a number of vegetation communities across the Site, including areas of Mineral Thicket Swamp (SWT2-2) and Gray Dogwood Thicket Swamp/Phragmites/Cattail Marsh (SWT2-9/MAM2). Shallow piezometers were installed in these areas;
- Single Well Response Tests (SWRT) were completed on three (3) monitoring wells and resulted in estimated hydraulic conductivities ranging from 3.5×10^{-3} to 5.4×10^{-4} m/s for the sand and sand and gravel, and from 1.2×10^{-8} to 8.9×10^{-9} m/s for the clayey silt till;
- Areas of thick sand and gravel deposits are found closest to Kilally Rod, in the southern portion of the Site. These areas have been identified as the best locations for implementing secondary infiltration facilities during development;
- In-situ infiltration testing was completed across the Site in January 2021. One test pit (TP3) had a valid result and resulted in a hydraulic conductivity of 5.4×10^{-4} m/s. The remaining test pits either had materials which were too coarse to test or thick sequences of till which could not be tested. Grain size analyses were completed on selected locations which could not be effectively tested in the field;
- Design infiltration rates for areas within sand and gravel are roughly 150 mm/hr and areas within sand are roughly 54 mm/hr;
- Groundwater quality testing showed exceedances of nitrate at BH4/MW and of dissolved lead at P3S and P3D. Surface water analysis showed exceedances of total phosphorous at SW1 and SW2, and a total aluminum and total iron during select sampling events;
- The entire Site is considered a Significant Groundwater Recharge Area (SGRA) and a Highly Vulnerable Aquifer (HVA);
- Water balance calculations were carried out for the post-development environment and show that a 17% reduction in runoff in Area A and a 35% reduction in runoff in Area B will be necessary to meet the target of 80% of pre-development infiltration volumes.

WATER BALANCE ANALYSIS

Section 3.3 of the completed Preliminary Stormwater Management Report by MTE Consultants Inc. addressed elements of Water Balance based on the hydrogeological investigation completed by EXP in December 2019.

The preliminary water balance calculation showed a post-development infiltration deficit under the post development conditions and recommends that LID measures be implemented to mitigate the deficit.

GEOTECHNICAL AND SLOPE STABILITY STUDY

EXP Services Inc. completed a Slope Stability Assessment, dated February 3, 2021, to determine the top of stable slope and setback (if any) associated with the proposed residential development.

It was concluded that the site slopes are generally very gradual with inclinations ranging from 4.3H:1V to flatter than 5H:1V. The Thames River watercourse is located over 200m towards the north of the base of the slope at the Site. Based on the slope stability analyses the slope is

generally stable, no potential erosion hazards were identified, and the slope inclinations are flatter than the criteria outlined in the MNRF's Technical Guide to require any development setback. No development setback from the slope is required for the development from a geotechnical standpoint.

TRANSPORTATION REQUIREMENTS

A Transportation and Traffic Planning Study was completed with the *Kilally South Area Plan – Update* in 2003 in anticipation of full development.

Interior streets are proposed as 'Local' roads (referred to as 'Neighbourhood Streets' under the London Plan) with a right-of-way (ROW) width of 20m. An increased ROW has been proposed for a portion of Agathos St. and Street 'A' to accommodate the oversized storm sewer.

	Road Classification	Right-of-way Width (m)
Agathos Street (extension)	Local	20.0m*
Street 'A'	Local	20.0m*
Street 'B'	Local	20.0m
Street 'C'	Local	20.0m
Street 'D'	Local	20.0m

* to accommodate the oversized storm sewer portions of the street have been widened to 21.5m

PARKS

- Block 229 is proposed parkland also containing the trunk/oversized sanitary sewer connection;
- Block 230 is proposed oversized storm sewer connection;
- An Open Space block (Block 233) will accommodate a continuation of the Thames Valley Parkway within the buffer; and
- Block 232 will serve as a walkway connection from Agathos Street to the proposed extension of the TVP.

Parkland requirements for this development have already been satisfied through previous agreements between the Matthews Group and the City of London. As stated in the *Kilally South Area Plan - Update (2003)*:

"Park land credits were given to Matthews Group for larger public park dedications in the Kilally area west of Highbury along the Thames River. The result of the credits is that there is no further public park land dedication requirement of Drewlo Holdings."

As a result, parkland blocks within the proposed development will be purchased by the City.

5. PLANNING FRAMEWORK AND ANALYSIS

5.1. PLANNING ACT, RSO 1990

Section 51 of the *Planning Act* addresses the legislative requirements with regards to Plan of Subdivision Approvals. Section 51(24) specifically addresses the matters with which regard should be had. The proposed draft plan of subdivision addresses the items as follows:

Clause (a) the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;

Response: The proposed development is consistent with the matters of provincial interest referred to in Section 2. The proposed development has regard for: the protection of ecological systems, features and functions; the orderly development of safe and healthy communities; the provision of a full range of housing; and the promotion of well-designed built form, with a sense of place and high quality, accessible public spaces.

A full analysis of the applications consistency with the Provincial Planning Statement can be found in Section 5.2 of this report.

Clause (b) whether the proposed subdivision is premature or in the public interest;

Response: The Subject Lands are within a built-up area in the City of London, within the established Urban Growth Boundary limit. There is existing development to the west; and planned development to the south and east. The proposed development is a logical continuation of the “Kilally on the Thames” development (33M-757) to the west.

The lands are designated for a variety of residential uses through the Neighbourhoods Place Type of the London Plan. It has been demonstrated that sufficient servicing capacity exists for the proposed development. As such, the proposed development is not premature and is in the public interest.

Clause (c) whether the plan conforms to the official plan and adjacent plans of subdivision, if any;

Response: The proposed draft plan of subdivision is consistent with the London Plan. The proposed layout is also generally consistent with the Kilally South Area Plan (June 2003). The proposal is consistent with development patterns of the adjacent subdivision (33M-757), which locates higher intensity uses adjacent higher order roads.

Clause (d) the suitability of the land for the purposes for which it is to be subdivided;

Response: The subject lands are currently vacant; with approximately 14.5ha at the north limit being vegetated area.

Area within the Green Space Place Type of the London Plan is proposed to remain as Open Space in addition to approximately 0.67ha of walkway/buffer space, separating the proposed development from the ecological features.

The remaining +/- 21.6ha is well suited for development. The topography is variable, having been previously altered for aggregate extraction activities; however, the overall grading pattern slopes toward the Thames River.

Clause (d.1) if any affordable housing units are being proposed, the suitability of the proposed units for affordable housing;

Response: No discounted/subsidized units are being provided.

Consistent with policy of the London Plan (518_), 40% of new housing units will be provided in forms other than single detached dwellings, to achieve a 25% affordable housing component through a mix of housing types and sizes.

It is anticipated that approximately +/-75% of new housing units in the proposed plan of subdivision will be in a form other than SFD.

The subject lands and proposed development are well suited for affordability and attainability, as community integration is desired as a matter of Provincial Interest (Section 2 (j) the adequate provision of a full range of housing).

Clause (e) the number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;

Response: Access to the proposed subdivision will come from two (2) new connections (Street 'A' and Street 'D') along the existing highway (Kilally Road). Additional access is provided through the extension of Agathos Street from the west. Internal road connections (Street 'B' and Street 'C') are also provided.

All proposed roads are consistent with the City of London's standards, based on their road classification.

Clause (f) the dimensions and shapes of the proposed lots;

Response: The proposed lot/block layout is appropriate for the subdivision. The single detached lots are consistent with the adjacent low-density neighbourhood to the west and block sizes are consistent with a development project of this scale.

Clause (g) the restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land;

Response: Current ESA lands are to remain as Open Space, north of the proposed development area. Adequate buffers have been provided to ensure the area is not negatively impacted by the proposed development.

This area is part of a greater ESA which extends onto lands to the east. The ESA has been discussed in detail through the submitted EIS.

Clause (h) conservation of natural resources and flood control;

Response: Approximately 14.5ha at the north end of the site is green space. This area is to remain 'as-is', furthering the conservation of natural resources.

The proposed development is well outside the flood limit of the Thames River. Additional flood control will be provided through storm sewers that will direct stormwater to an existing SWMF west of the site.

Clause (i) the adequacy of utilities and municipal services;

Response: It has been confirmed that the subject lands can be serviced by existing sanitary and water services. A SWMF to the west will handle majority of stormwater from the subject lands; it is anticipated a small percentage of clean water will be directed to the north to maintain pre-development water balance to existing features.

Clause (j) the adequacy of school sites;

Response: The subject lands are well serviced by various school boards, with existing schools already within the surrounding communities.

No comments were received from TVDSB or LDCSB in response to pre-consultation documents.

Clause (k) the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;

Response: Several Open Space blocks are proposed to be conveyed to the City of London, in addition to a small Park block. The area of these blocks is detailed on the submitted draft plan of subdivision.

Parkland requirements for these lands were satisfied through previously plans of subdivision to the west.

Clause (l) the extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy;

Response: The proposed development promotes active mobility through pedestrian and cycling facilities and supports higher order transit. The plan creates direct and efficient vehicle connections to the higher order street system. Energy saving construction materials will be used where possible in the construction process, as required by OBC (Ontario Building Code).

Clause (m) the interrelationship between the design of the proposed plan of subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area designated under subsection 41(2) of this Act.

Response: Several blocks within the Plan of Subdivision will require Site Plan Approval (SPA) at a later date once development schemes have been prepared for the individual blocks. The Block layout has been designed to support Urban Design/City Building

policies of the *London Plan* to ensure that when SPA is sought for any block, the development can achieve the goals and objectives of the *London Plan* and Site Plan Control By-law. The single detached lots within the plan are not subject to Site Plan Approval.

5.2. PROVINCIAL PLANNING STATEMENT, 2024 (PPS)

The proposed development is consistent with the policies of the Provincial Planning Statement (2024). 1782 Kilally Road is within the Urban Growth Boundary and is identified by the London Plan as lands intended for mixed-use, residential development. The site has full access to City services and is intended to be developed as a comprehensive, transit-oriented residential development, while protecting on-site and adjacent natural heritage areas.

The following is an analysis of applicable PPS policies relating to the proposed Plan of Subdivision, Official Plan and Zoning By-law Amendment.

Policy 2.1.4 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 lands which are designated and available for residential development;*
- 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, including units in draft approved or registered plans.*

Response: The subject site is located within London's Urban Growth Boundary. Existing services have been determined to have capacity to accommodate the proposed development.

Policy 2.1.6 Planning authorities should support the achievement of complete communities by:

- a) *accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;*
- b) *improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and*
- c) *improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.*

Response: The proposed land uses within the subdivision provide for a range of housing types from low-density, single detached residential to low-to-mid-rise, residential apartment buildings, as well as provides open space/parkland uses. The proposed development is estimated to include up to 950 units, +/-75% of which will be in a form

other than single detached dwellings; promoting a range of attainability and affordability to meet the long-term needs of the immediate community and overall City. Higher densities have been oriented toward major streets to optimize transit investments, and to provide a transition of intensity from Kilally Road toward the Thames River/natural area. The neighbourhood will be designed to allow people of all ages and abilities to be able to fully participate within society, being created to allow for universal accessibility.

Policy 2.3.1.2 Land use patterns within settlement areas should be based on densities and a mix of land uses which:

- a) efficiently use land and resources;*
- b) optimize existing and planned infrastructure and public service facilities;*
- c) support active transportation;*
- d) are transit-supportive, as appropriate; and*
- e) are freight-supportive.*

Response: The proposed development has a range of proposed residential densities from low density, single detached dwellings and townhomes, to medium density apartment buildings. The proposed range of residential uses and densities creates attainable, 'age-in-place' opportunities, and also diversifies the housing market within this area of the City. The development uses lands within London's Urban Growth Boundary and makes efficient use of existing infrastructure and services.

The proposed development incorporates higher density uses along Kilally Road, consistent with policy direction of the London Plan. The mix and transition of housing types and forms will provide a buffer between potential traffic noise and lower density uses. The proposed variety of housing types and forms will support the long-term housing needs of the community, allowing residents the opportunity to 'age-in-place'.

2.8.1.1 Planning authorities shall promote economic development and competitiveness by:

- a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;*
- b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;*
- c) identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;*
- d) encouraging intensification of employment uses and compatible, compact, mixed-use development to support the achievement of complete communities; and*
- e) addressing land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses.*

Response: There are no employment blocks proposed as part of this development; however, the subject lands are proximate to the Highbury Avenue North and Fanshawe Park Road East intersection which is a planned and developing community commercial node.

In the short term, the development and construction of the subject lands will facilitate economic investment in local job markets such masonry, framing, carpentry, etc. Over the long term, economic stimulation will continue to provide for a wide range of economic uses including insurance, furniture sales, telecommunication, etc.

The addition of housing supply represents necessary infrastructure which will provide residences for a variety of employees across various sectors to support current and projected needs of industry within the City of London; allowing those industries to grow, and attracting new employers/economic investment.

Policy 3.9.1 Healthy, active, and inclusive communities should be promoted by:

- a) *planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate active transportation and community connectivity;*
- b) *planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources;*

Response: The proposed development is an example of a community which promotes healthy and active lifestyles as well as inclusivity. The proposed street network of the subdivision has been designed following the City of London's "Complete Streets Approach" where applicable. The subdivision features a connection to the existing Drew Park, from Phase 1 of the "Edgevalley on the Thames" subdivision, as well as open space blocks connecting to the trails found in the Edgevalley Stormwater Pond area. These trails connect to the Thames Valley Parkway, providing residents access to other areas of the city, and facilitating high levels of safe active transportation options.

Policy 4.1.1 Natural features and areas shall be protected for the long term.

Response: Existing natural features north of the site, extending to the Thames River, are proposed to be protected for the long term.

Policy 4.1.2 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.

Response: The diversity and connectivity of natural features in the area, including the long-term ecological function and biodiversity of natural heritage systems, will be maintained as the existing natural area is proposed to remain. Appropriate buffers have been applied to ensure impacts to the existing natural areas are avoided.

Policy 4.6.2 Planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the significant archaeological resources have been conserved.

Response: The lands have been cleared on any archaeological potential. Ministry clearance indicating no further work was required, was issued January 24, 2007.

5.3. CITY POLICY OVERVIEW – THE LONDON PLAN

The following is a planning analysis of the applicable *London Plan* policies and how they relate to the proposed development and proposed amendments.

LP Policy 55_ Direction #1 Plan strategically for a prosperous city

5. Invest in an infrastructure system that is sustainable, reliable, secure, affordable, and in compliance with regulatory criteria.

Response: The proposed development connects to existing infrastructure. The details of which have been discussed in the submitted Servicing Report(s).

11. Plan for cost-efficient growth patterns that use our financial resources wisely.

Response: The proposed development represents a cost-efficient growth pattern. It is within the Urban Growth Boundary and utilizes existing services constructed “just in time” as part of the City’s GMIS process.

13. Invest in, and promote, affordable housing to revitalize neighbourhoods and ensure housing for all Londoners.

Response: Consist with London Plan Policy 518_, more than 40% of the new housing units proposed are in forms other than single detached dwellings, contributing to a mix of housing types and sizes.

LP Policy 58_ Direction #4 Become one of the greenest cities in Canada

9. *Strengthen our urban forest by monitoring its condition, planting more, protecting more and better maintaining trees and woodlands.*

Response: Existing ESA at the north end of the property is proposed to be maintained. Additional trees will be planted along the proposed walkway, in park areas, and along streets consistent with the City of London's Design Specification & Requirements manual.

10. *Continually expand, improve, and connect our parks resources.*

Response: The proposed development would serve to expand, improve and connect park resources by providing a continuation of the TVP, connecting to available park resources and further trail connections to the west. The proposed location will provide a possible future connection for continuation to the east.

11. *Implement green infrastructure and low impact development strategies.*

Response: Green infrastructure and low impact development strategies will be implemented consistent with the City of London's Design Specifications and Requirements Manual.

LP Policy 59_ Direction #5 Build a mixed-use compact city

2. *Plan to achieve a compact, contiguous pattern of growth – looking “inward and upward”.*

Response: The proposed development represents a compact, contiguous pattern of growth. The proposed implementation of the Upper Maximum Height for blocks abutting Kilally Road would successfully fulfill the desire for “upward and inward” growth.

LP Policy 60_ Direction #6 Place a new emphasis on creating attractive mobility choices

1. *Create active mobility choices such as walking, cycling, and transit to support safe, affordable, and healthy communities.*

Response: Consistent with the City's Complete Streets Manual, the proposed development will help to create active mobility choices to support safe, affordable and healthy communities.

2. *Ensure that our mobility infrastructure is accessible and accommodates people of all abilities.*

Response: Mobility infrastructure within the proposed development will be accessible and accommodate individuals of all abilities.

5. Focus intense, mixed-use development to centres that will support and be served by rapid transit integrated with walking and cycling.

Response: The proposed development focuses higher density forms of development toward Kilally Road, the higher order street. The proposed development has available transit within an 800m walk, and is well services by infrastructure to support walking and cycling.

7. Utilize a grid, or modified grid, system of streets in neighbourhoods to maximize connectivity and ease of mobility.

Response: The proposed development implements a modified grid system to maximize connectivity and ease mobility.

LP Policy 61_ Direction #7 Build strong, healthy and attractive neighbourhoods for everyone

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.

Response: Drewlo is committed to creating diverse communities; offering a range of housing forms in every neighbourhood we develop. The proposed range of complementary densities creates the opportunity for mixing demographic sectors, offers a range of economic selections, and contributes to a diversity of choice in relation to life cycle needs – ensuring the long-term sustainability of the community.

The proposed development is well connected to surrounding amenities, facilities and services.

3. Implement “placemaking” by promoting neighbourhood design that creates safe, diverse, walkable, healthy, and connected communities, creating a sense of place and character.

Response: As discussed in Section 5.3.2 below, the proposed development has incorporated elements of placemaking to create a safe, diverse, walkable, healthy, and connected community with a sense of place and character.

9. Integrate well-designed public spaces and recreational facilities into all of our neighbourhoods.

Response: Various well-designed public spaces and recreational facilities are or will be available in the neighbourhood.

Drew Park and Edgevalley Park, and branches of the Thames Valley Parkway were established as part of the adjacent development. Additional recreational uses are anticipated to be introduced and development within this area progresses.

10. Integrate affordable forms of housing in all neighbourhoods and explore creative opportunities for rehabilitating our public housing resources.

Response: As discussed in response to London Plan Policy 55_13., consist with London Plan Policy 518_, more than 40% of the new housing units proposed are in forms other than single detached dwellings, contributing to a mix of housing types and sizes.

There are no public housing resources proposed within the development.

LP Policy 62_ Direction #8 Make wise planning decisions

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

Response: This Planning Justification Report demonstrates conformity with The London Plan and the Provincial Planning Statement (2024).

3. Think “big picture” and long-term when making planning decisions – consider the implications of a short-term and/or site-specific planning decision within the context of this broader view.

Response: The proposed development is consistent with the “big picture” and long-term vision of the City and this area, as demonstrated throughout this report when considering conformity with The London Plan and South Kilally Area Plan.

8. Avoid current and future land use conflicts – mitigate conflicts where they cannot be avoided. AND LP Policy 62_9. Ensure new development is a good fit within the context of an existing neighbourhood.

Response: The proposed development fits well within the context of the existing and planned neighbourhood.

The Draft Plan of Subdivision and requested Official Plan/Zoning By-law Amendment will not create current or future land use conflicts.

LP Policy 198_ All proposals for new neighbourhoods will be required to establish a vision to guide planning for their character and sense of place.

Response: The proposed development continues the neighbourhood character established in “Kilally on the Thames” to the west. This includes a strong sense of place and identity established by the neighbourhood’s connection to the Thames River and associated ESA/environmental areas.

The proposed development will continue the diversity of housing choices established in the adjacent subdivision (33M-757), and will further enhance trail connections to the downtown via the TVP.

The vision of the proposed development is further discussed in Section 5.3.2 in relation to the City of London's Placemaking Guidelines.

LP Policy 201_ New neighbourhoods should be designed with consideration for the character of existing landscapes and topography. The street network and civic infrastructure will be established in consideration of this goal.

Response: The topography of the subject lands contributes to the character of the development. Additionally, the Kilally Forest ESA is a focal point which establishes a 'sense of place' for this development, and the adjacent developments (existing and proposed).

Consideration for the landscape is evident in the placement of the TVP extension. This trail network has been sited adjacent the ESA to take advantage of the natural heritage and to also provide a buffer to development.

LP Policy 202_ Buildings and public spaces at key entry points into neighbourhoods will be designed to help establish a neighbourhood's character and identity.

Response: The character and identity establish in the development to the west will be continued through the proposed development. Medium density blocks along Kilally Road will be designed such that buildings are blocks to frame the entry points of the neighbourhood.

LP Policy 203_ Neighbourhoods should be planned to include one or more identifiable and accessible focal points that contributes to the neighbourhood's character and allows for community gathering.

Response: There are three (3) major focal points within the "Kilally on the Thames" Development (33M-757 & subject lands); these are the Kilally Forest ESA, the Edgevalley SWMF, and the Thames River.

All three (3) focal points are accessible via the TVP and provide opportunities for community gathering.

LP Policy 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, or building placement.

Response: Views of the Kilally Forest ESA are maintained along the proposed extension of the TVP. Connections to this pathway have been provided at various locations within the proposed development.

Further views of the overall natural heritage system will be optimized from upper levels of future low-rise apartment buildings within MDR blocks.

LP Policy 212_ *The configuration of streets planned for new neighbourhoods will be of a grid, or a modified grid, pattern. Cul-de-sacs, deadends, and other street patterns which inhibit such street networks should be minimized. To ensure connectivity and integration with existing and planned neighbourhoods, new neighbourhood street networks will generally be designed to have connections to existing and future neighbourhoods.*

Response: The proposed street network is a modified grid pattern which provides necessary connection to future development lands east of the subject lands.

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

Response: The proposed development includes a range lot sizes. Further, the proposed medium density blocks are anticipated to be developed with a variety of townhouse and low-to-mid-rise apartments. The overall mix of the proposed development will accommodate residents with a range of ages and abilities.

LP Policy 349_ *To support walkability, sidewalks shall be located on both sides of all streets, with possible exemptions in the following instances. In most of these instances a sidewalk will be required on one side of the street.*

Response: Consistent with the City's Complete Street Manual and Design Specifications & Requirements Manual sidewalks will be provided as required.

LP Policy 495_ *Providing accessible and affordable housing options for all Londoners is an important element of building a prosperous city. Quality housing is a necessary component of a city that people want to live and invest in. Housing choice is influenced by location, type, size, tenure, and accessibility. Affordability and housing options are provided by establishing variety in these factors.*

Response: The proposed development offers a variety of housing types, sizes and levels of accessibility; both for sale and purpose-built rental units will be provided.

LP Policy 518_ *Secondary plans and larger residential development proposals should include a 25% affordable housing component through a mix of housing types and sizes. In keeping with this intent, 40% of new housing units within a secondary plan, and lands exceeding five hectares in size outside of any secondary plan, should be in forms other than single detached dwellings.*

Response: over 76% of the proposed development, well beyond the 40% target, is proposed to be in forms other than single detached dwellings.

LP Policy 916_3. *A diversity of housing choices allowing for affordability and giving people the opportunity to remain in their neighbourhoods as they age if they choose to do so.*

Response: The proposed development will provide a variety of housing forms, types and levels of affordability. Single detached dwellings, an assortment of townhome products, and low-rise apartment buildings are proposed. It is anticipated that there will be a range of for-sale and purpose-built rental product within the proposed development.

Drewlo is committed to creating diverse communities, offering a range of housing forms and attainability's in every neighbourhood we develop. The range of complementary densities proposed will create opportunities for the mixing of demographic sections, offer a range of economic selections and contribute to a diversity of choice in relation to life cycle needs – ensuring the long-term sustainability of the community.

The proposed development will provide a variety of housing forms, types and levels of affordability. Single detached dwellings, an assortment of townhome products, and low-to-mid-rise apartment buildings are proposed. It is anticipated that there will be a range of for-sale and purpose-built rental product within the proposed development. This range will offer residents the opportunity to age-in-place as their needs change and evolve over time.

LP Policy 918_ *We will realize our vision for the Neighbourhoods Place Type by implementing the following in all the planning we do and the public works we undertake:*

2. *Neighbourhoods will be planned for diversity and mix and should avoid the broad segregation of different housing types, intensities, and forms.*

3. *Affordable housing will be planned for, and integrated into, all neighbourhoods.*

7. *Street networks within neighbourhoods will be designed to be pedestrian, cycling and transit-oriented, giving priority to these forms of mobility.*

12. *Neighbourhoods will be designed to protect the Natural Heritage System, adding to neighbourhood health, identity and sense of place.*

Response: The proposed development is planned to provide a diversity and mix of housing choice. As discussed in response to Policy 518_ this helps to introduce choice and affordability into the neighbourhood.

The proposed street networks will be designed to be pedestrian, cycling and transit-oriented as required by the City's Design Specifications & Requirements Manual.

Additionally, the existing Natural Heritage System is maintained and protected.

LP Table 10 – Range of Permitted Uses in Neighbourhoods Place Type

Response: Consistent with the permissions of Table 10, higher densities (low-rise apartments and townhomes) are being proposed along the Civic Boulevard (Kilally Road).

The remainder of the development, fronting Neighbourhood Streets is proposed to be single detached dwellings.

LP Table 11 – Range of Permitted Heights in Neighbourhoods Place Type

Response: Consistent with the permissions of Table 11, lots fronting onto Neighbourhood Streets will not exceed 2.5 storeys in height.

Zoning is being requested for the MDR blocks along Kilally Road (Civic Boulevard) that would facilitate heights up to 6 storeys consistent with the 'upper maximum height' permitted along a Civic Boulevard.

LP Policy 1638 *The maximum height in the applicable Place Type may include a standard maximum and upper maximum height. Zoning on individual sites may be permitted up to the standard maximum height. Applications to exceed the standard maximum height will be reviewed on a site-specific basis and will not require an amendment to this Plan. Heights exceeding the upper maximum will require an amendment to this Plan.*

Response: Consistent with Table 11, the requested R1-13 zone are consistent with the Standard Maximum Height permitted for lots fronting a neighbourhood street.

The requested maximum height of 6 storeys through the modified R8-4 zone is consistent with the Upper Maximum Height permitted for Blocks fronting a Civic Boulevard. It is appropriate within the neighbourhood context as it is consistent with the approved height for the abutting block (west).

Buildings above 4 storeys (i.e. 5 or 6 storeys in height) will be directed toward Kilally Road, ensuring lower density forms are not impacted by the increased height.

Drewlo Holdings Inc. owns future development lands to the south. It is anticipated development blocks on the lands to the south will proceed under similar policy permissions. It is not anticipated that the proposed increases in height (above the Standard Maximum) will negatively impact lands to the south.

All MDR blocks within the proposed development will be subject to Site Plan Approval in the future, which will review potential impacts in detail and ensure that mitigating measures are implemented.

LP Policy 759_ *Our vision is to protect the Green Space Place Type, create new green linkages throughout the city and increase our tree cover. Our Green Space policies together with our Environmental Policies will protect and conserve our natural areas and their delicate ecosystems, keep development an appropriate distance from our hazard lands, and offer a variety of parks that contribute significantly to the quality of life for Londoners.*

Response: The proposed development limit has been set to protect and conserve the existing natural area. The submitted EIS further addresses the proposed buffer and establishment of the development limit.

LP Policy 761_1. *Provide a continuous linear green space network which generally follows the Thames River and its tributaries.*

Response: The Kilally Forest ESA is part of the continuous linear green space network along the Thames River. The proposed development will not encroach on this system.

As indicated in **LP Policy 1713_**, Planning and development applications shall be reviewed to determine their consistency with the provisions of any applicable guideline document. The following listed guideline documents are applicable to the proposed development;

- City of London Placemaking Guidelines;
- Kilally Open Space Master Plan;
- Thames River Valley Corridor Plan; and
- Archaeological Management Plan.

ARCHAEOLOGICAL MANAGEMENT PLAN (AMENDED APRIL 2018)

Figure 1 of the AMP (Archaeological Management Plan, 2018), depicting the Indigenous Archaeological Site Potential, identifies portions of the property as an area of “Pre-Contact Archaeological Potential”.

Figure 5 of the AMP indicates that the area assessed as part of the Kilally South Area Plan has been “cleared of Archaeological concern”; this area includes the subject lands.

The Ministry of Culture provided Archaeological Clearance for the subject lands in January 2007, indicating “no further investigations are warranted for the subject property”.

A few Historical Domestic/Industrial/Commercial/Institutional Features are identified along Kilally Road on Figure 4 of the AMP. Within proximity to the development; 1880 Kilally Road and 1745 Kilally Road are still identified as Heritage Resources. The proposed development is not anticipated to impact either property.

CITY OF LONDON'S PLACEMAKING GUIDELINES (NOVEMBER 2007)

The design of the proposed development was established with consideration for the physical context, with the most prominent feature being the Thames River and associated ESA located along the north boundary. Consistent with the adjacent development, it is proposed that the TVP (Thames Valley Parkway) will run along the length of this feature providing a passive recreational amenity through which the community can enjoy the existing natural feature. The River and ESA contribute to the identity and character of the area.

The first phase of Kilally on the Thames (33M-757) was marketed as a subdivision with an assortment of traditional and contemporary single family homes steps from the Thames River. It was established as a community for the outdoor enthusiast; offering opportunities for outdoor adventure, scenic views, paths and parks, with good access to shopping, restaurants, pharmacies and major transportation routes. The vision was to create a neighbourhood surrounded by nature in proximity to basic amenities.

The proposed development is an extension of that community. It will continue to build on the vision of Phase 1, offering an assortment of traditional and contemporary single-family homes on a variety of lot sizes; in addition to a diversity of housing opportunities to be provided in the form of townhomes and low-rise apartment buildings. Phase 2 – Kilally on the Thames will provide further opportunity for outdoor adventure through the extension of the TVP along the established Kilally Woodland ESA and Thames Corridor, connecting the proposed development to parkland and the expansive Edgevalley SWM facility.

The sense of place created in Phase 1 has been continued through the design of Phase 2. Similar to the first phase of Kilally on the Thames, the limits of the proposed development are clearly identified by the Thames River and associated ESA to the north, and Kilally Road to the south. A pattern of focal entry points is continued along Kilally Road, as higher intensity forms are proposed similar to the approval development located at 475 & 480 Edgevalley Road (also known as Block 139 & 140, 33M-757).

Similar to the adjacent development, buildings are anticipated to be sited at the corners of Street 'A' and Kilally Road to create a defined point of entry. The architectural design will address both street frontages, creating visual interest within the streetscape.

Agathos Street continues through the proposed development, ensuring the new community is both physically and visually integrated into the existing fabric of the area. Design elements and building forms will be similar and complementary to those constructed in Phase 1, establishing a common design connection between the two phases.

The proposed development offers a mix of land uses, densities, scale, building types, architectural designs, and housing opportunities;

- The subject lands provide a good mix and interaction of residential development with open space;
- The development is proposed to offer a range of complementary densities ranging from single-family detached homes to townhomes and low-rise apartment buildings. This range creates opportunities for the mixing of demographic sectors, and offers a range of economic selections – furthered through the combination of ownership and tenant/rental options. The proposed range also provides a diversity of choice in relation to life cycle needs, which contributes to the long-term sustainability of the development and overall neighbourhood;
- The mix of scale, height and building type proposed within this development - along with varied approaches to architectural and landscape design, will ensure that interesting streetscapes are created. The proposed development will have both a variety of building scale as well as a range of building heights. Single family detached dwellings will include both bungalows and 2-storey homes; towns are anticipated to range from 2-storey “traditional” forms with individual garages to 3-storey back-to-back units or 4-storey stacked units; and low-rise apartment buildings are anticipated to range in height from 4-storeys to 6-storeys. A gradual decrease in height/scale will occur across the site, moving north from Kilally Road to the Thames River;

Consistent with the vision of the development, the extension of the TVP establishes a visually and physically stimulating interface for residents with the natural environment. It further contributes to the attractive, inviting and functional pedestrian environment established in Phase 1 (33M-757), taking advantage of the views and vistas along the Thames River Corridor and providing residents with an active mobility option which is fully separated from automobile traffic.

As outlined above, the proposed development represents smart growth and incorporates a variety of placemaking elements that contribute to a liveable and healthy community.

KILALLY OPEN SPACE MASTER PLAN (MARCH 1999)

The subject lands are outside the limits of the Kilally Open Space Master Plan study.

THAMES RIVER VALLEY CORRIDOR PLAN (DECEMBER 2011)

The City recognizes the Thames Valley Corridor as its most important natural, cultural, recreational and aesthetic resource. The Thames River Valley Corridor (TRVC) Plan establishes a vision to preserve and enhance the natural environment, Thames River health, vistas, beauty and cultural heritage of the Thames Valley Corridor, while accommodating compatible infrastructure, accessibility and recreation.

The subject lands are part of the ‘North Branch’ of the Thames Valley Corridor. Its Character Areas are shown on Figure 4c of the Plan; they include the existing ESA, a potential valley access point, proposed TVP extension and an edge zone area (which is outside the corridor area but

within 100m of normal water line). A “natural area” is also shown in the middle of the subject lands, consistent with a vegetated area that was previously removed as part of Site Alteration (Agreement executed in 2010, removal occurred between 2012-2013 based on aerial imagery).

Consistent with the Key Strategies of the TRVC Plan, the features and functions of the Kilally Meadows ESA are protected. This has been further discussed in the submitted EIS (MTE).

The proposed TVP extension will create an appropriately located and designed pathway that directs access around the natural area to protect its ecological attributes. This extension will contribute to the “filling” of a gap identified in the TRVC Plan, being the connection from Highbury Avenue to Clarke Road.

5.4. KILALLY SOUTH AREA PLAN

The subject lands were reviewed as part of the Kilally South Area Plan Update (June 2003). Land use schedules in the 1989 Official Plan were adopted based on the findings of this Community Plan. The Kilally South Area Plan is an important part of the Site’s history; however, policy direction would come from the London Plan.

6. CONCLUSIONS

In summary, the requested Official Plan and Zoning By-law Amendment and proposed Plan of Subdivision for 1782 Kilally Road are consistent, and in general conformity with, the framework of planning policy; including the *Planning Act*, Provincial Planning Statement (PPS, 2024), the *London Plan* and associated Guideline Documents.

The proposed development is compatible with existing development, and will be compatible with the future surrounding development; it will increase the range of housing opportunities by providing a diversity of housing types and forms; and represents efficient growth patterns.

Given the noted and discussed considerations, it is recommended that the City of London approve the requested Plan of Subdivision and combined Official Plan/Zoning By-law Amendment.