



PLANNING JUSTIFICATION **REPORT**

1766 WILTON GROVE ROAD

LONDON / ON



Client

Dancor Construction Ltd.

Contact

Michael Davis, MCIP, RPP
mdavis@siv-ik.ca | 905.921.9029 | siv-ik.ca

PREPARED BY
Siv-ik Planning and Design Inc.

PREPARED FOR
Dancor Construction Ltd.

VERSION 1.0

ISSUED
08.30.2025

CONTACT
Michael Davis | Partner
905.921.9029
mdavis@siv-ik.ca

COPYRIGHT NOTICE
Copyright © 2025 by Siv-ik Planning and Design Inc. The content of this document is the intellectual property of Siv-ik Planning and Design Inc. Reproduction or redistribution of this document by the City of London or other stakeholders through the planning application process is permitted. Reproduction or redistribution of any portion of this document or use of the intellectual ideas contained within it for any other purpose is prohibited without the consent of Siv-ik Planning and Design Inc.

CONTENTS

S1: Introduction	01
S2: Planning Framework	05
S3: Site Analysis	07
S4: Planning Applications	09
S5: Concept Plan	11
S6: Planning Analysis	17
S7: Conclusions	27

ABOUT THIS REPORT
This report has been prepared by Siv-ik Planning and Design Inc. for Dancor Construction Ltd. as part of our CREATE process. The report provides an overview of the physical context, planning framework and technical requirements applicable to the proposed development at 1766 Wilton Grove Road. The graphics and supporting text are intended to highlight links between those factors the specific planning/design response proposed for the site. The report describes the relevant details of the proposed Official Plan and Zoning By-law Amendments and an independent professional planning opinion on their merits.

1. INTRODUCTION

1.1 Background

This report has been prepared by Siv-ik Planning & Design Inc. for Dancor Construction Ltd. (the registered owner of the property) in support of an Official Plan and Zoning By-law Amendment application for the lands municipally described as 1766 Wilton Grove Road, in London, ON. This report provides an independent professional analysis and opinion regarding the merits of the proposed Official Plan and Zoning By-law Amendment and has been prepared to satisfy the City of London’s complete application requirements. The report explains how the proposed Official Plan and Zoning By-law Amendment aligns with the objectives of the Provincial Policy Statement (2024), the London Plan, represents sound planning and is in the public interest. This report is meant to be read in conjunction with the conceptual Site Plan (08-30-2025) prepared by Siv-ik Inc.

1.2 Project Site

The subject property is municipally known as 1766 Wilton Grove Road and is located on the north side of Wilton Grove Road, approximately 300 metres east of Cheese Factory Road and immediately south of Highway 401 in south London. The site is located within the City’s Urban Growth Boundary within a large cluster of existing and planned industrial development in southeast London commonly referred to as the “Forest City Industrial Park”. The property has an area of approximately 26.6 hectares (65.7 acres) and currently contains an existing dwelling and a cluster of agricultural buildings. Large portions of the site remain under active agricultural cultivation. A watercourse bisects the property, and the northeast portion contains an existing patch of natural vegetation. Overall, the site is relatively flat, with an average elevation of approximately 270 metres above sea level (masl) and a slight drop in elevation along the on-site watercourse.

1.3 Area Context

The land use pattern within approximately 400 metres of the subject site consists of a mix of existing industrial uses, future industrial development, and agricultural lands. The site is located at the southeastern extent of the City’s Urban Growth Boundary, marking the transition between the urban industrial area and the surrounding rural landscape. Lands to the east and south remain agricultural, characterized by actively cultivated fields and natural features. Lands to the west, situated southeast of the intersection of Highway 401 and Highbury Avenue, are developed with large-scale industrial operations, including logistics, warehousing, and light manufacturing uses. Notably, approximately 400 metres southwest of the site is the Maple Leaf Foods processing facility, a 650,000 square foot food processing plant that opened in 2022. Immediately west of the site is a vacant, City-owned property designated for future industrial development. Given its proximity to Highway 401 and the Veterans Memorial Parkway corridor, the subject site is strategically positioned to support future industrial growth in this area of the city.

AT-A-GLANCE

Site Area	26.6 Hectares
Frontage	297.5 Metres
Depth	890.5 metres
Existing Use	Agricultural
Servicing	Unserviced

-  Highway 401 Corridor
-  Agricultural
-  Future Industrial (City-Owned Parcel)
-  Agricultural

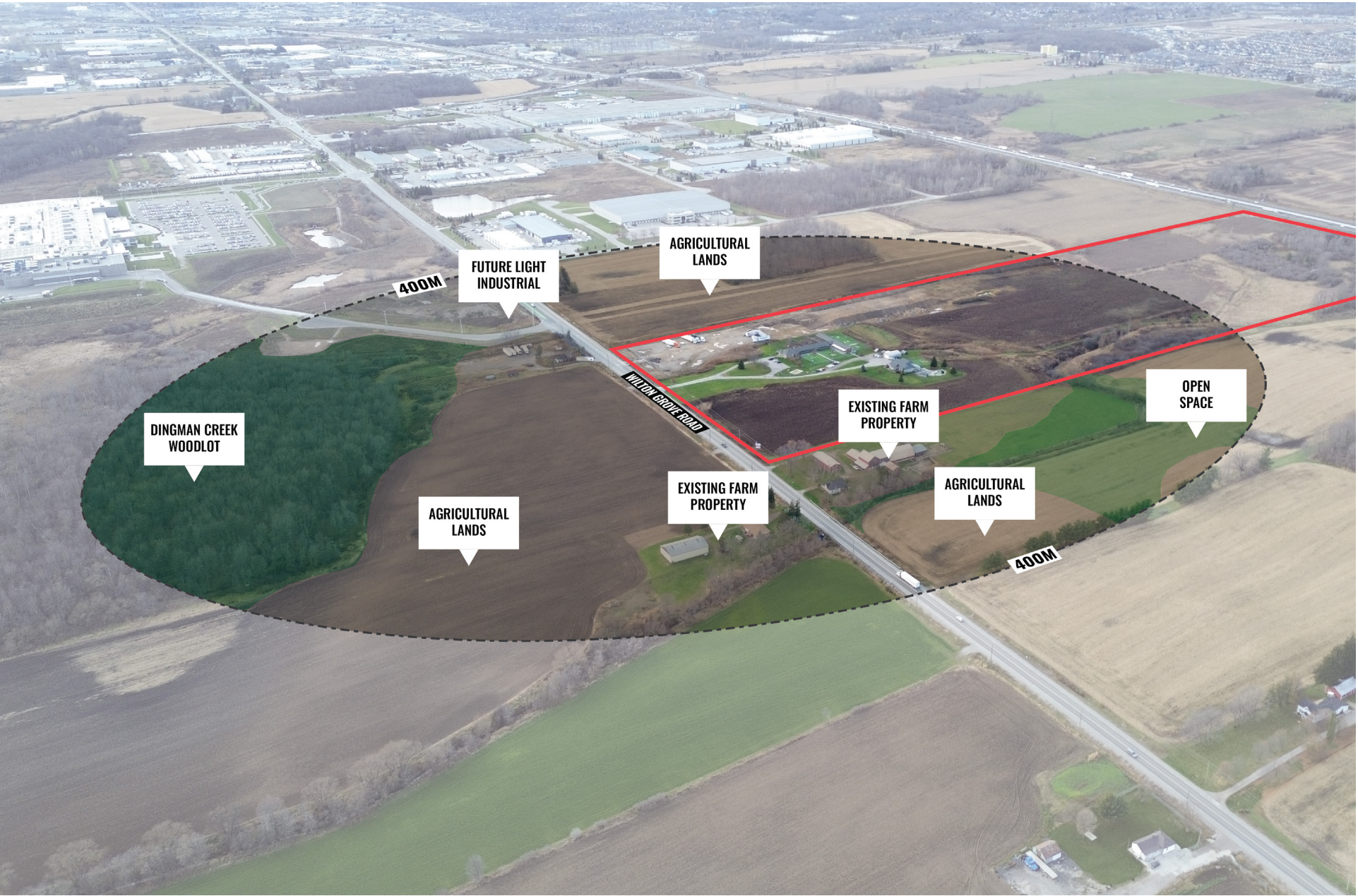


Figure 1: Site Overview



Figure 2: Top-down aerial view of 1766 Wilton Grove Road (south portion)



Figure 3: Top-down aerial perspective of 1766 Wilton Grove Road (north portion)

2. PLANNING FRAMEWORK

2.1 City of London Official Plan

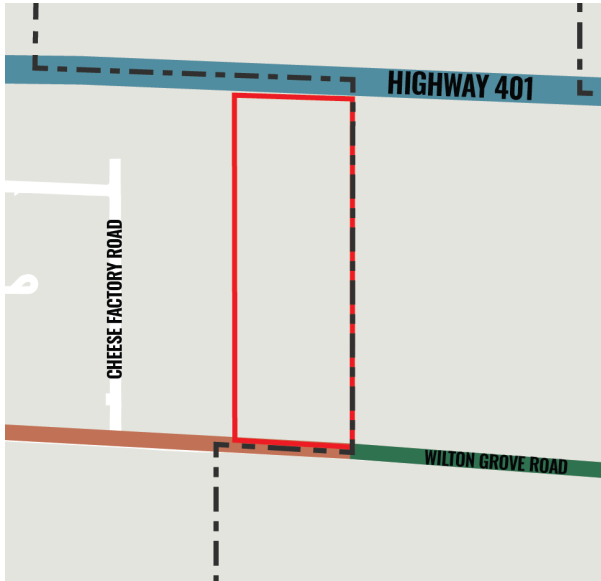
The project site is located within the City of London’s Urban Growth Boundary. The mapping excerpts below are taken from Maps 1, 2, and 5 of The London Plan - specifically illustrating Place Types, Street Types, and Natural Features applicable to the site. According to Map 1 – Place Types, the property is designated “Future Industrial Growth.” This designation is applied to lands identified for future industrial development, where it is anticipated that specific Industrial Place Types will be assigned at a later date. While this is often achieved through detailed studies or secondary plans, site-specific applications may also be considered appropriate to establish future land use permissions. Wilton Grove Road is identified as a Civic Boulevard on Map 2 – Street Types and is also recognized as a Truck Route in the City’s Mobility Master Plan, supporting the development of industries reliant on truck transportation. In addition, Map 5 – Natural Features identifies several environmental features on the property, including a watercourse, wetlands, woodlands and valleylands. The presence of these features has prompted the preparation of an Environmental Impact Study (EIS), which evaluates the site’s physical and environmental conditions and provides recommendations for developable areas, open space designations, and appropriate setbacks to ensure the long-term protection of key natural features and ecological functions.

Map 1 - Place Types



- Green Space
- Farmland
- Future Industrial Growth
- Environmental Review
- Light Industrial
- Urban Growth Boundary

Map 3 - Street Types



- Provincial Highway
- Rural Thoroughfare
- Civic Boulevard
- Urban Growth Boundary

Map 5 - Natural Features



- Significant Wetlands
- Significant Woodlands
- Significant Valleylands
- Valleylands
- Watercourse
- Urban Growth Boundary

2.2 City of London Zoning By-law Z.-1

The subject lands are currently zoned Agricultural (AG2) and Open Space (OS4 and OS5) under the City of London Zoning By-law. The AG2 Zone reflects the property’s existing/historical agricultural use and functions primarily as an “interim” designation. It permits only agricultural and limited non-farm uses and is not intended to provide a long-term regulatory framework for urban development. This zoning does not align with the future intentions established through the London Plan, which identifies the lands for future employment uses within the Urban Growth Boundary. As such, the AG2 Zone effectively serves as a holding zone, maintaining the existing use of the property until a site-specific Official Plan and Zoning By-law Amendment is brought forward with the necessary technical studies to establish a zoning framework consistent with the London Plan’s vision for the area. The Open Space (OS4 and OS5) Zones have been applied to portions of the site that contain or are adjacent to identified natural heritage features. These zones serve to recognize and protect environmentally sensitive areas by restricting development and site alteration.

2.3 Planning History

In 2012, the City of London initiated a comprehensive review of its employment land needs to ensure an adequate long-term supply to support population and job growth. As part of this review, approximately 300 hectares of additional industrial lands were brought into the Urban Growth Boundary (UGB) in southeast London, strategically located near Highway 401 to strengthen the City’s role as a regional hub for logistics, manufacturing, and goods movement. The subject property at 1766 Wilton Grove Road was among the parcels included in this expansion. At that time, the lands were designated “Urban Reserve – Industrial Growth (now “Future Industrial Growth”) to recognize their long-term industrial potential while deferring detailed planning until servicing, transportation, and environmental matters could be fully assessed. This designation served as an interim framework, reserving the lands for future employment uses pending site-specific planning applications and supporting studies.

Nearby, the Forest City Industrial Park, located north of Wilton Grove Road between Highbury Avenue and Highway 401, exemplifies the area’s successful industrial development. Initially developed by the City on 178 acres acquired in 2001, the park was fully serviced by 2003, offering 134 developable acres to the market. As of July 2021, 130 acres have been sold, with only one 3.2-acre parcel remaining pending additional environmental review.

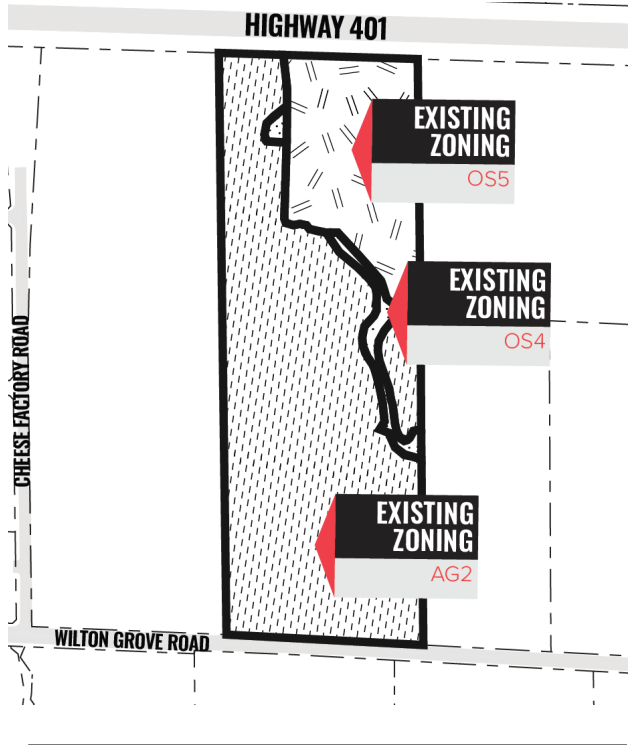


Figure 4: Existing Zoning Map

3. SITE ANALYSIS

The subject property at 1766 Wilton Grove Road is located within the Forest City Industrial Park, a broader area of light industrial development situated southeast of Highway 401 and Highbury Avenue. The surrounding area is characterized by a high proportion of developed industrial lands, particularly within 300 metres west of the site along Cheese Factory Road. The site is positioned at the eastern edge of the City of London’s Urban Growth Boundary, beyond which the landscape transitions to agricultural uses.

From a transportation perspective, the site benefits from significant connectivity. It fronts onto Wilton Grove Road, an identified “Truck Route” within the City of London, and is immediately adjacent to the Highway 401 corridor to the north, with convenient access via Wilton Grove Road and Highbury Avenue. This proximity to major transportation infrastructure supports the site’s suitability for logistics, warehousing, and transport-oriented industrial uses. In addition, the site is serviced by the London Transit Commission, with Route 30 operating along Wilton Grove Road and Cheese Factory Road, providing connections to the broader city transit network for employees.

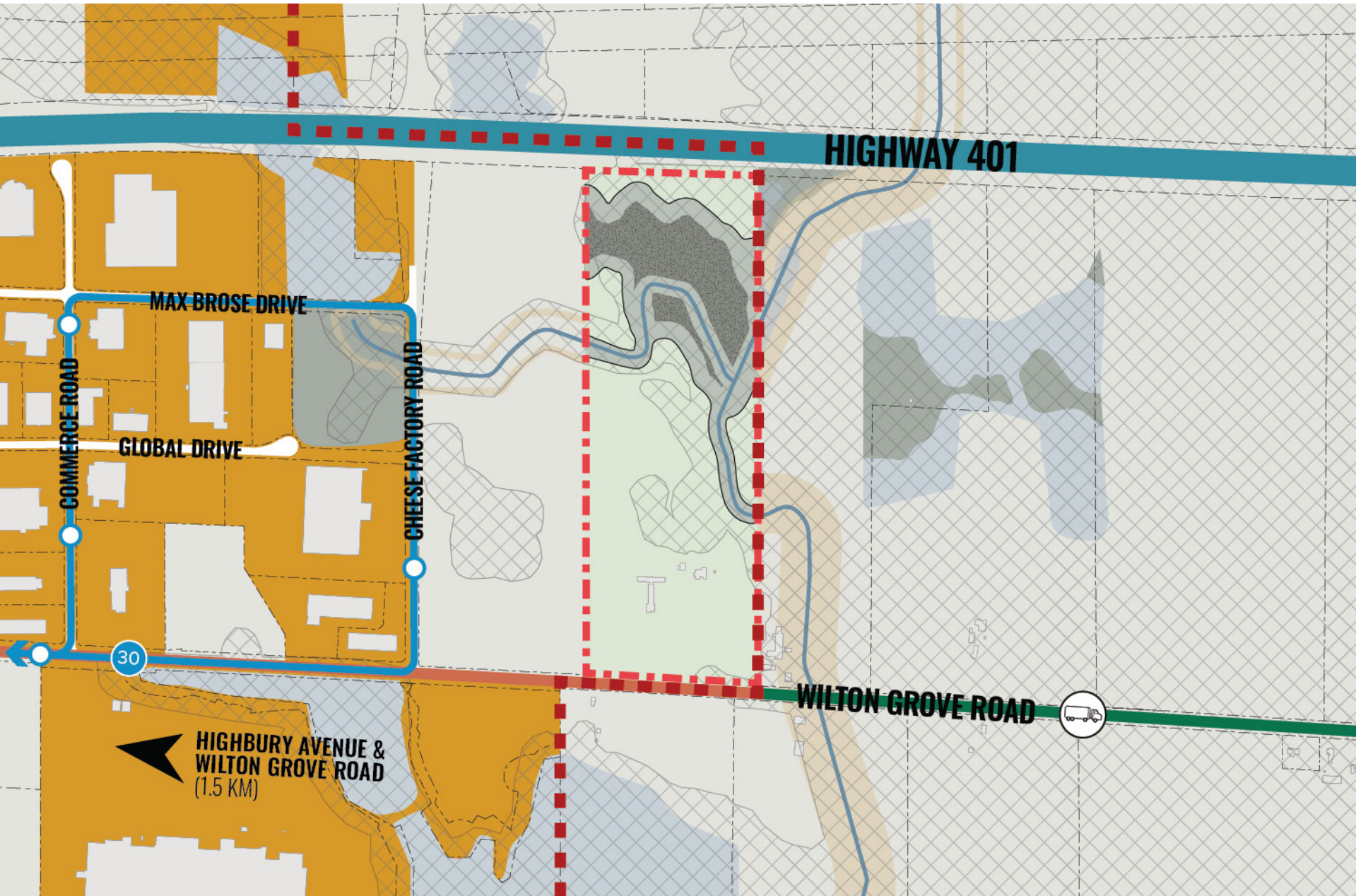
The site itself is relatively flat, which facilitates efficient industrial development and circulation. The main developable portion encompasses over 14 hectares and provides approximately 300 metres of frontage along Wilton Grove Road. This extensive frontage allows for multiple access points, enabling safe and efficient circulation for large trucks and minimizing potential conflicts with surrounding traffic.

Significant portions of the property are constrained by natural features, including a watercourse, valleylands, woodlands, and a provincially significant wetland. The presence of these features, and associated development buffers established through an Environmental Impact Study (EIS) prepared by Pinchin Environmental, informs the planning and design of the site. The specific nature of these features and the recommended buffers are discussed in further detail in Section 6 of this report.

Overall, the site represents a highly suitable location for light industrial development, with opportunities arising from its strategic location within the Forest City Industrial Park, strong transportation connections, flat topography, and ample frontage on Wilton Grove Road. The key constraints relate to the protection of natural features and the need to maintain compatibility with adjacent agricultural lands. The site analysis highlights the balancing of development efficiency with environmental and land use considerations, which has informed the planning and design approach for the property outlined further in this report.

LEGEND

- Urban Growth Boundary
- Watercourse
- LTC Bus Route
- LTC Bus Stop
- Total Development Limit
- Provincial Highway
- Civic Boulevard
- Rural Thoroughfare
- Ecologically Sensitive Area
- Ecological Buffer Setback
- UTRCA Regulated Area
- Existing Industrial Development



4. PLANNING APPLICATIONS

4.1 Official Plan Amendment

The primary intent of the planning application is to re-designate the lands from their current “Future Industrial Growth” Place Type to the “Light Industrial Place Type on Map 1 - Place Types of the London Plan. The Future Growth Place Types establish City Council’s intent for future urban development on the lands to which they are applied. The Future Growth Place Types establish this intent, while ensuring that development does not occur until such time as the necessary background studies are completed and a comprehensive and coordinated plan is prepared for the entire area that conforms with the policies of this Plan. Given the “build-out” of nearby industrial lands to the west, Dancor’s intention for the site and the assigned Place Types to Forest City Industrial Park lands at the southeast corner of the 401 & Highbury, the Light Industrial Place Type represents an appropriate long-term designation for the property. A complete analysis of the background studies and the planning evaluation that supports the re-designation of the lands from Future Industrial Growth to Light Industrial is contained with Section 6 of this report. No site-specific special policies are contemplated by way of this amendment.

In addition to the proposed amendment to Map 1, a detailed Environmental Impact Study has been completed for the property which has determined the specific characteristics and delineation of on-site natural features. The EIS provides a basis for amendments to Map 5 - Natural Features of the London Plan. Through this application, it is proposed that adjustments be made to Map 5 to reflect the applicable findings of the EIS.



Figure 5: Existing Map 1 - Place Types



Figure 6: Proposed Map 1 - Place Types

4.2 Zoning By-law Amendment

The proposed Zoning By-law seeks to align the zoning on the property with the proposed Official Plan Amendment and allow for a range of appropriate light industrial/employment uses to be developed on the lands. Accordingly, the proposed Zoning By-law Amendment seeks to re-zone the unconstrained lands from their current Agricultural (AG2) Zone category to the Light Industrial (LI6) Zone and the Urban Reserve (UR5) Zone. The proposed amendment also seeks to modify the current extents of the OS4 and OS5 Zone to reflect the findings of a site-specific Environmental Impact Assessment which has resulted in a refined delineation of the key features and establishment of appropriate development buffers. The proposed LI6 zone maintains an appropriate set of built form standards to guide future development and site alteration through the Site Plan Control application process. The UR5 zone has been applied to select “pockets” of the site that could be suitable for future urban development but are not currently accessible given the natural heritage constraints. Overall, the proposed ZBA will facilitate the redevelopment of a multi-tenant light industrial development proposed by Dancor described in Section 5.0 of this report below. Additionally, the proposed amendments will secure the long-term protection of significant natural heritage features and their associated ecological functions. No special provisions are requested as part of the proposed Zoning By-law Amendment as the base regulations of the LI6 Zone provide appropriate guidance and flexibility to allow for the conceptual development plan and other desirable outcomes.

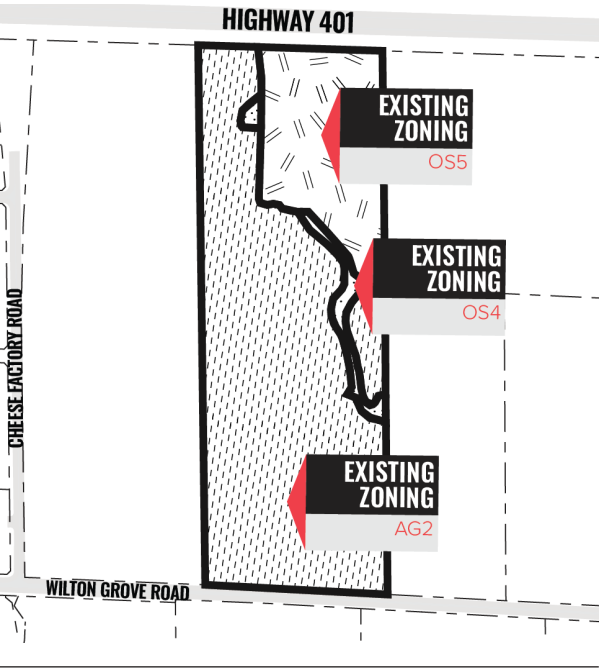


Figure 7: Existing Zoning

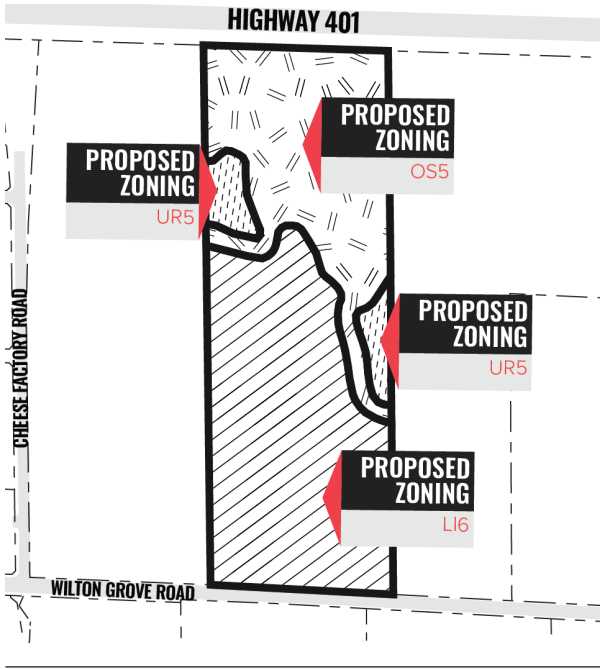


Figure 8: Proposed Zoning

5. CONCEPT PLAN

5.1 Multi-Tenant Light Industrial Complex

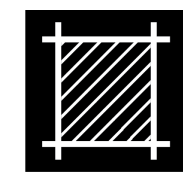
The proposed development at 1766 Wilton Grove Road envisions the construction of three (3) large-scale light industrial buildings on the southern, developable portion of the site. The are proposed for development is a total of 14.71 hectares (36.35 acres) in size. The total proposed gross floor area is approximately 54,755 square metres (approx. 589,400sf), complemented by an additional 2,000 square metres of accessory office space. The buildings are designed to accommodate a range of light industrial uses, including logistics and transport terminals, advanced warehousing operations, and light manufacturing or processing industries, consistent with the intended function of the Light Industrial Place Type. The specific uses will be established by future leasing/sales to the end users and confirmed through the Site Plan Approval process.

Vehicular access to the site will be provided directly from Wilton Grove Road, with two access points proposed, one on the east side and one on the west side, to facilitate efficient truck and employee traffic circulation across the property. The concept plan incorporates 463 surface parking stalls along with dedicated loading areas and hard-surfaced truck circulation routes, ensuring the site can accommodate both employee and heavy-vehicle movements safely and efficiently. The northern portion of the property, delineated by an existing watercourse and 15-metre buffer, will remain largely naturalized to protect identified natural heritage features and associated buffers. This approach ensures a clear transition between developed and natural areas and aligns with the recommendations of the site-specific Environmental Impact Study.

Overall, the proposed development represents a strategic and market-responsive addition to London’s inventory of industrial lands, providing high-quality, employment-generating space with excellent proximity to Highway 401 and the city’s major goods-movement network.

A series of simplified supporting illustrations have been prepared by Siv-ik Planning and Design Inc. to highlight key elements of the conceptual site and building design in a manner that enables a more seamless evaluation by stakeholders and decision-makers. A dimensioned conceptual site plan has been prepared and provided with the complete Official Plan and Zoning By-law Amendment application. The detailed conceptual site plan should be referred to where detailed dimensions and specifications are required for review or evaluation.

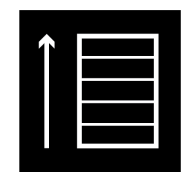
SITE AREA (PROPOSED FOR DEVELOPMENT)



14.71

HECTARES

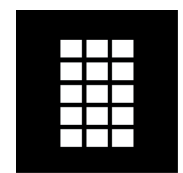
BUILDINGS



3

LIGHT INDUSTRIAL

GROSS FLOOR AREA



54,755

SQUARE METRES

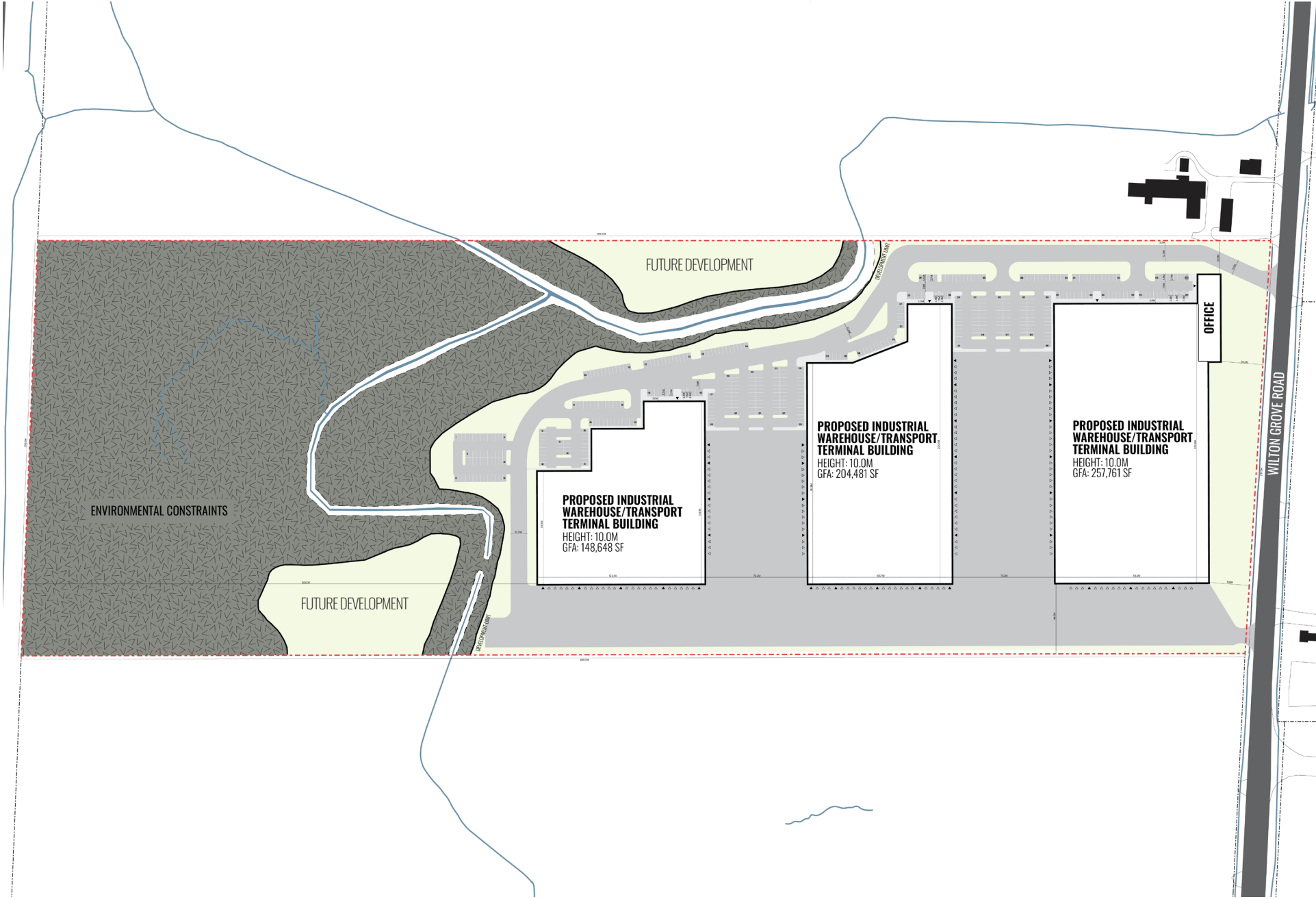


Note: Massing Diagram of Conceptual Building Forms/Site Layout

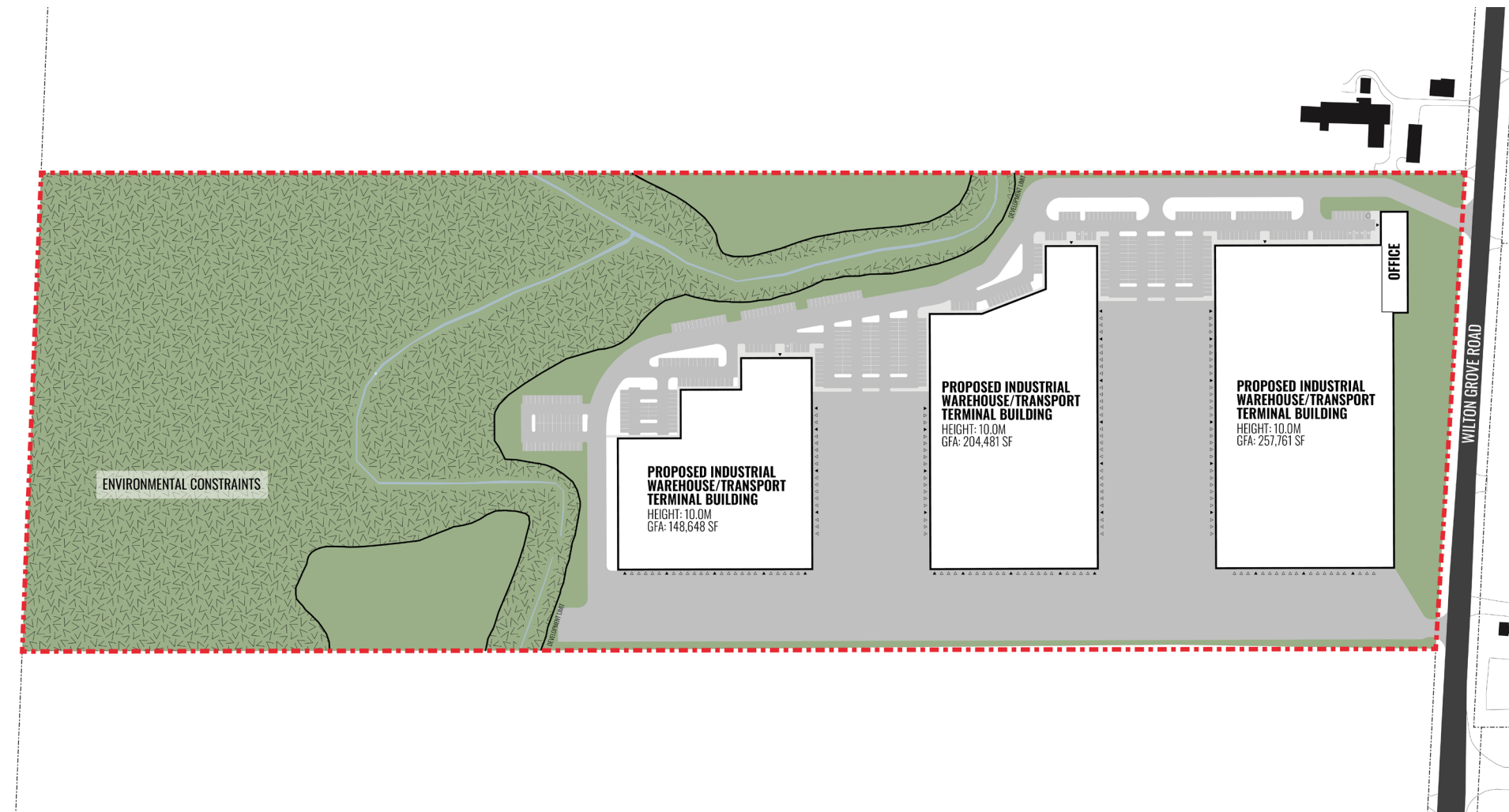
5.2 1766 Wilton Grove Road - Concept Plan Statistics

LI6 Zone Requirements	Regulations	Concept Plan (LI6 Area)	Special Provision Required (Y/N)
Permitted Uses	See detailed list in Section 40.2	Transport Terminal	N
Lot Area (min.)	2,000.0m2	14.71 hectares	N
Frontage (min.)	30.0m	297.5m	N
Front and Exterior Yard Depth (min.)	1.5m	30.1m	N
Interior and Rear Yard Depth (min.)	Abutting a Residential Zone: 25.0m Abutting a Non-Residential Zone: 1.2m per 3m of main building height.	23.9m	N
Lot Coverage (max.)	60%	37.2%	N
Landscaped Open Space (min.)	10%	15.8%	N
Height (max.)	15.0m	10.0m	N
Open Storage (max.)	25%	0%	N
Total GFA for Office Uses (max.)	2,000m2	2,000m2	N
Parking (min.)	1 per 500.0m2	453 (1 per 120.0m2)	N

Table 1. Zoning Data Table



Note: Conceptual Site Plan

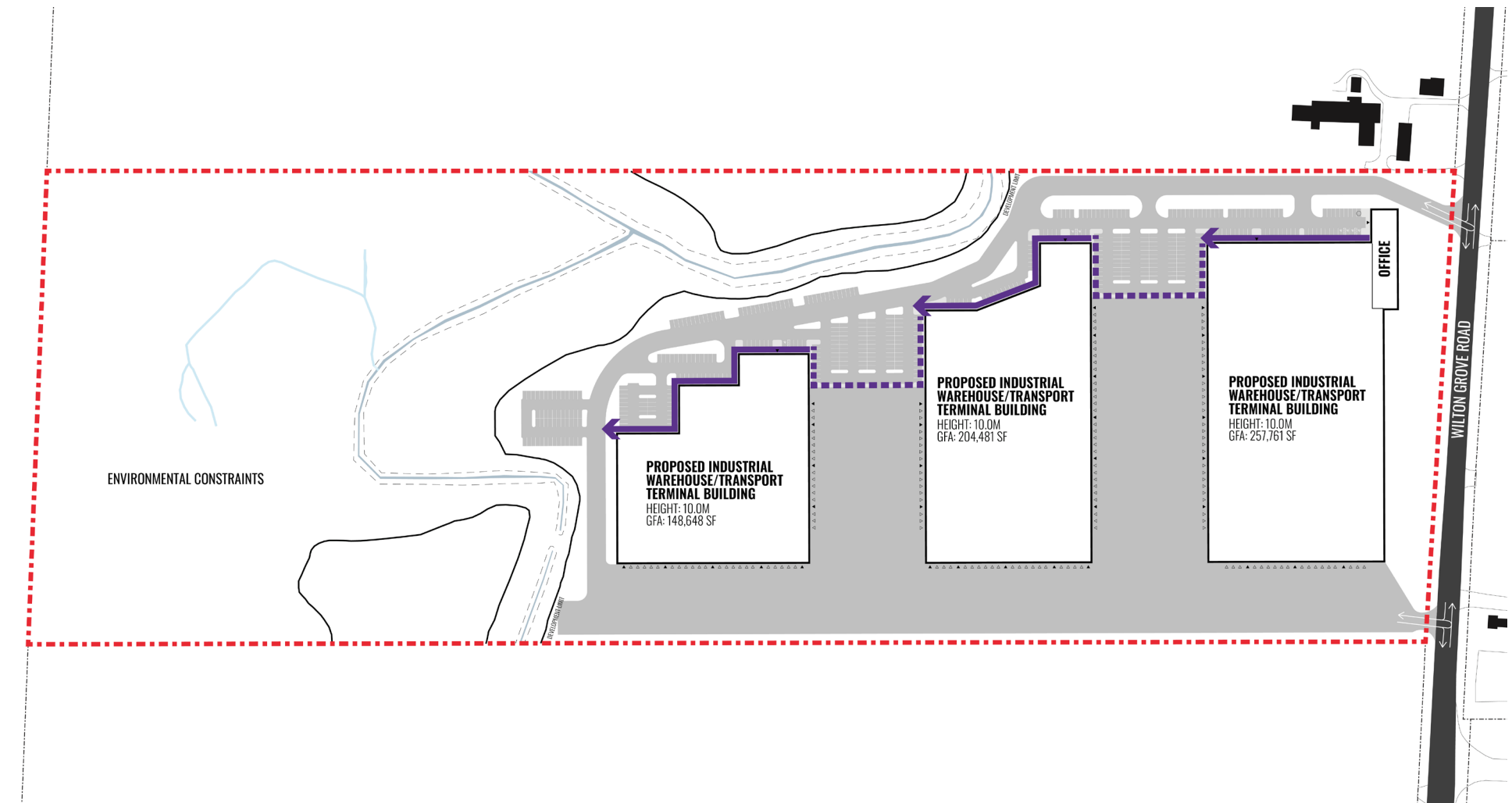


LEGEND

- ▲ Individual Unit Entrances
- ▲ Garage Entrances
- Existing Building Footprint
- Site Boundary
- Landscaped Area
- Development Limit

NOTE: This simplified site plan has been prepared based on the detailed site concept plan by Siv-ik Planning & Design. It is meant to aid in illustrating the parameters for the site redevelopment which will be formalized during subsequent stages of the planning process and reviewed through the Site Plan Control application.

Figure 9: Simplified Site/Landscape Plan



LEGEND

- ▲ Individual Unit Entrances
- ▲ Garage Entrances
- Existing Building Footprint
- Site Boundary
- Pedestrian Connection
- Vehicular Circulation

NOTE: This simplified site access and circulation plan has been prepared based on the detailed site concept plan by Siv-ik Planning & Design. It is meant to aid in illustrating the key attributes and functions of the development concept related to vehicular and pedestrian movements. For dimensions and full site details, please refer to the 08-30-2025 conceptual site plan.

Figure 10: Simplified Site Access & Circulation Plan

6. PLANNING ANALYSIS

6.1 Preface

The following section provides a comprehensive planning analysis in support of the proposed Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) for the lands municipally known as 1766 Wilton Grove Road. The analysis evaluates the proposal in the context of the City of London’s policy framework, including The London Plan, the Zoning By-law, and other relevant municipal and provincial planning documents.

The purpose of the Official Plan Amendment is intended to re-designate developable portions of the subject lands from the “Future Industrial Growth” Place Type to the “Light Industrial” Place Type within The London Plan. This change will allow the lands to be brought into the City’s urban industrial structure and developed for employment uses consistent with surrounding and planned development in the area.

In conjunction with the proposed OPA, a Zoning By-law Amendment is proposed to rezone the developable portions of the property from the Agricultural (AG2) Zone to a Light Industrial (LI6) Zone and Urban Reserve (UR5) Zone. The proposed LI6 zoning category appropriately implements the Light Industrial Place Type by permitting a range of light manufacturing, warehousing, and related industrial uses in a form compatible with the surrounding industrial context. A concept plan prepared by Dancor demonstrates how the lands can be developed in full compliance with the standard provisions of the LI6 Zone. The proposed Zoning By-law Amendment also includes the application of the Open Space (OS5) Zone to portions of the site containing natural heritage features and associated buffers. Additional areas of the site proposed for ecological enhancement/restoration are also included within the proposed OS5 Zone. These areas are to be protected and managed in accordance with the recommendations of the Environmental Impact Study (EIS) prepared for the site, ensuring the long-term conservation of ecological functions associated with on-site features.

The analysis that follows demonstrates that the proposed amendments are consistent with the PPS, 2024, conform to the intent of The London Plan, conform to the City’s broader planning objectives, and represent a logical and compatible extension of existing industrial development in southeast London.

6.2 Provincial Planning Statement (2024)

The Provincial planning policy framework is established through the Planning Act (Section 3) and the Provincial Planning Statement (PPS 2024). The Planning Act requires that all municipal land use decisions affecting planning matters be consistent with the PPS. The primary mechanism for the implementation of the Provincial plans and policies is through the City of London Official Plan. Through the preparation, adoption and provincial approval of the City of London Official Plan, there is an established the local policy framework for the implementation of the Provincial planning policy framework. As such, matters of provincial interest are largely addressed in the Official Plan discussion in this report. However, acknowledging the scope of the proposed development and the nature of the applications being submitted (i.e., Official Plan Amendment), it is important to highlight some of the key objectives and policy directions of the PPS.

2.1 Planning for People and Homes

The PPS encourages the creation of complete communities by accommodating a range and mix of land uses, housing options, transportation choices, employment opportunities, public service facilities, and open space. The proposed re-designation of the site from “Future Industrial Growth” to “Light Industrial” Place Type directly supports these objectives by providing lands for employment uses within the City’s Urban Growth Boundary, contributing to a balanced and sustainable land use pattern that supports long-term economic growth and community needs.

2.3.1 General Policies for Settlement Areas

Settlement areas are intended to be the focus of growth and development, with land use patterns that efficiently utilize land and infrastructure, support active transportation, and are transit- and freight-supportive. The subject site is located within the City’s Urban Growth Boundary and is adjacent to major transportation corridors, including Highway 401, Highbury Avenue and Wilton Grove Road. By facilitating light industrial development on a site that is strategically located for goods movement, the proposal promotes the efficient use of existing infrastructure while maintaining compatibility with surrounding industrial uses.

2.8 Employment

The PPS emphasizes the importance of planning for and preserving employment areas to support a modern and diversified economy. Policies 2.8.1 and 2.8.2 highlight the need to provide market-ready sites for a broad range of employment uses, including manufacturing, warehousing, and logistics; to protect employment areas in proximity to major goods movement facilities and corridors; and to ensure long-term operational and economic viability by managing land use compatibility with adjacent non-employment areas. The proposed Official Plan Amendment and Zoning By-law Amendment for 1766 Wilton Grove Road advance these objectives by re-designating the site to a Light Industrial Place Type, enabling industrial uses that align with the City’s employment growth strategy, and rezoning the site to LI6, which permits a range of light industrial uses consistent with the planned function of the area. Environmentally sensitive lands are proposed to be zoned Open Space (OS5) in accordance with recommendations from the site-specific Environmental Impact Study, ensuring the protection of significant on-site natural features. By adding strategically located, developable employment lands in southeast London, the proposal also supports the City’s broader economic competitiveness and the long-term viability of industrial development within the urban structure.

6.3 City of London Official Plan (The London Plan)

In general, the Future Growth Place Types establish City Council’s intent for future urban development on the lands to which they are applied. The Future Growth Place Types establish this intent, while ensuring that development does not occur until such time as the necessary background studies are completed and a comprehensive and coordinated plan is prepared that conforms with the policies of the Plan and demonstrates the developability and appropriateness of development on a given site. The Future Industrial Growth Place Type is applied where there is an expectation that Industrial Place Types will be assigned to the area in the future, pending further study. In most cases, a secondary plan will be completed to establish where the Heavy Industrial, Light Industrial and Commercial Industrial Place Types will be applied and to plan comprehensively for development of the area.

Policy 1164 of the London Plan provides guidance for situations where future growth lands can be re-designated to other urban Place Types outside of a Secondary Plan process. In general, the future industrial growth lands surrounding and including 1766 Wilton Grove Road are limited in size and do not require a high degree of coordination to support the build-out of each parcel, given the intent for industrial use (i.e., no coordination of parks or other key civic infrastructure such as schools). The other parcels within the Future Growth Place Type can confidently develop and would not be hindered by the development of 1766 Wilton Grove Road. Specifically, lands to the west (1710 Wilton Grove Road) maintain dual street frontage on Wilton Grove Road and Cheese Factory Road and have direct access to municipal services without cross-connections from 1766 Wilton Grove Road.

It is our opinion that the proposal meets the relevant criteria outlined in Section 1164 of the London Plan and that re-designation of 1766 Wilton Grove Road to the Light Industrial Place Type can proceed via the proposed amendment, without a broader secondary plan for the area.

1164_Proposals to amend the Future Growth Place Type in favour of another Urban Place Type will require a secondary plan, unless it can be clearly demonstrated that all of the following criteria are met: :

Policy Criteria		Rationale		Meets	
				Y	N
1.	The subject lands are limited in size and/or the lands represent a small remnant portion of a larger Future Growth Place Type that has since been changed to other Urban Place Types.	The subject site is one of only two parcels of land along Wilton Grove Road (east of Cheese Factory Road) designated within the Future Industrial Growth Place Type. Given the intent of this designation - to accommodate large-scale industrial facilities and users on substantial tracts of land - the site and the other Future Industrial Growth parcels together represent a relatively limited land area. In contrast, all other lands located southeast of the intersection of Highbury Avenue and Highway 401 are designated Light Industrial. The subject property at 1766 Wilton Grove Road is directly adjacent to a large municipally owned property to the west, which has been identified in the City's Industrial Land Development Strategy as a key area for future employment growth. The prior re-designation of 1577 Wilton Grove Road by the City has established an overarching intent for future planning in the area.		●	○
2.	The lands are separated by physical barriers from any other lands that are within a Future Growth Place Type.	Lands to the east of the subject site are designated Agricultural, while the Highway 401 corridor forms the northern boundary and Wilton Grove Road defines the southern edge. Physical barriers effectively enclose the site on three sides, limiting direct connectivity to surrounding lands. The property to the west is contiguous with 1766 Wilton Grove Road but benefits from two street frontages and full access to municipal services. As such, the proposed development of 1766 Wilton Grove Road will not constrain or negatively impact the future development potential of the adjacent lands.		●	○
3.	The lands can be adequately planned without the need for a secondary plan to coordinate community design, natural heritage preservation, street layout, civic infrastructure, parks, conservation of cultural heritage resources, or other matters that a secondary plan would address.	1766 Wilton Grove Road can be confidently planned without the need for complex, coordinated studies. Only one other parcel east of Cheese Factory Road is designated within the Future Industrial Growth Place Type, with that adjacent parcel being municipally owned by the City of London. Given the intended use for large-scale industrial facilities, the lands are not intrinsically interconnected and do not require a secondary plan. Access to the site will be provided directly from Wilton Grove Road, which is designated as a Truck Route. Furthermore, consistent with the industrial land use designation, there are no interconnecting parks or pathway networks required. Natural heritage features have been protected and established through the completed Environmental Impact Study (EIS) and only a minor component of the natural heritage system		●	○
4.	The proposed development would not adversely affect the long-term planning of the surrounding lands.	The development of 1766 Wilton Grove Road will not hinder or preclude the future development of other parcels within the Future Industrial Growth Place Type. The properties to the immediate east and south are Agricultural. Lands to the west benefit from dual frontage on both Wilton Grove Road and Cheese Factory Road, ensuring multiple access and subdivision opportunities remain. The application of the Light Industrial Place Type on the subject lands will not introduce uses that limit the developability of 1710 Wilton Grove Road, which also have full, uninterrupted access to municipal services. The prior re-designation of 1577 Wilton Grove Road has established an overarching intent for future planning in the area. Accordingly, light industrial development on the subject site will not negatively affect the development potential of surrounding lands, particularly given the prevalence of light industrial uses in this area.		●	○



Figure 11: OPA Rationale - Explanatory Graphic

6.3 Light Industrial Place Type

Industrial Place Types represent a critical part of London’s City Structure where one-third of Londoners work and where many of the goods and services we produce as a city are designed, manufactured, processed, assembled and then transported to the world. Through the London Plan, industrial lands have been strategically located where there is a strong demand for them and where they are well connected to the region and the world. This includes a variety of locations that have easy access to rail, the airport, major highways, and the existing industrial sectors that have evolved over time.

The London Plan establishes three separate Industrial Place Types that are shown on Map 1 – Place Types, to recognize their collective role in providing industrial opportunities in London: 1. Heavy Industrial; 2. Light Industrial; and, 3. Commercial Industrial.

The Official Plan Amendment for 1766 Wilton Grove Road, detailed in Section 4 of this report, intends that the site be re-designated to the Light Industrial Place Type. In accordance with Policy 1110_ of the London Plan, the Light Industrial Place Type is where industries generating more minimal planning impacts will be permitted. It is appropriate to separate these uses from heavier industrial users, to avoid land use conflicts and to allow for positive industrial environments. Additionally, Policy 1111_ provides that the Light Industrial Place Type may also contain Innovation Parks that focus on such things as light manufacturing, research and development, and the integration of knowledge-based functions with industrial production. These Innovation Parks need to provide a context that is attractive to the knowledge-based workers that these businesses recruit, and also to provide an environment that can support and enhance the image of the businesses that locate within them.

It is important to note that the existing “Future Industrial Growth” Place Type that applies to the lands already signals that it is the City’s intention that these lands be planned and developed for industrial uses. The Future Industrial Growth Place Type reflects the area’s proximity and accessibility to the Highway 401 Corridor and the fact that the majority of the lands within this segment of the City, southeast of Highbury/401 are already developed with industrial uses, limiting the viability of other uses such as new community growth.

In consideration of the various Industrial Place Types, it is our opinion that the Light Industrial Place Type is the appropriate designation for 1766 Wilton Grove Road. Given that 1766 Wilton Grove Road is currently at the eastern terminus of the Urban Growth Boundary, the Light Industrial Place Type will ensure the range of uses does not generate significant adverse affects that could pose negative impacts to the urban/rural interface. As per Map 1 - Place Types of the London Plan, all other existing Industrial lands to the southeast of Highbury/401 within the Urban Growth Boundary are designated Light Industrial (not Heavy Industrial) and thus the application of the light industrial place type will fit with the context and planned function of this area. Additionally, the Light Industrial Place Type will provide for a range of uses that leverages the accessibility to the Highway 401 corridors and aligns with a strong market needs for transportation, warehousing and logistics uses. The Light Industrial Place Type provides a suitable framework to enable the range of uses being sought by Dancor through the Zoning By-law Amendment application.

Policy 1113 of The London Plan establishes a range of objectives intended to implement the overall vision for the City’s Industrial Place Types. In relation to these objectives, the proposed designation of 1766 Wilton Grove Road as a Light Industrial Place Type will:

- Respond to the needs and demands of the industrial sectors the City seeks to attract by providing strategically located and well-connected industrial lands;
- Support a diverse industrial land base within the City of London by offering a broad range of lot sizes, services, and access options—including road and rail connections—to accommodate various industrial sectors and uses; and
- Capitalize on the site’s proximity to the Highway 401 and 402 corridors by offering opportunities for highway frontage and highly accessible locations that enhance the attractiveness of the City’s industrial land supply.

Use

Policy 1115 of the London Plan outlines the range of uses both permitted and contemplated within the Light Industrial Place Type. In general, this includes a broad range of industrial uses that are unlikely to impose significant impacts on surrounding light industrial land uses due to their emissions such as noise, odour, particulates and vibration. Industrial uses with large amounts of outdoor storage may not be permitted in the Light Industrial Place Type, dependent upon the character of the surrounding industrial area, specific policies at the end of this chapter, or any applicable guideline documents.

With regard to the policy 1115, the proposed Zoning By-law Amendment seeks to re-zone the developable portion of the subject lands from Agricultural (AG2) Zone to the Light Industrial (LI6) Zone category. The various Light Industrial Zone categories in Zoning By-law Z.-1 are generally meant to implement the Light Industrial Place Type in the Official Plan. Accordingly, the Light Industrial Zones provide for a range of uses that are permitted by the Place Type. Specifically, the LI6 Zone permits light manufacturing and large-scale warehousing/transport terminals.

With respect to the proposed Light Industrial designation, the proposed LI6 Zone provides for an appropriate range of uses to ensure compatibility with surrounding uses and the planned function of the broader Industrial area southeast of Highbury/401. It is important to note that the large majority of existing developed properties within the broader area are zoned some combination of LI1, LI2 and/or LI6. The LI6 Zones captures the permitted uses of both the LI1 and LI2 category and also allows for Storage Depots, Terminal Centres and Transport Terminals. Given the identification of Wilton Grove Road as a key Truck Route and Goods movement corridor and the proximity to the Highway 401, the LI6 provides an appropriate range of uses for the site and would allow for the development contemplated by Dancor Construction Ltd.

Intensity

Policy 1124 of the London Plan provides direction for the “intensity” of Development within the Industrial Place Types. Specifically, Industrial uses will be encouraged to utilize land efficiently. High building coverage ratios and high employment densities will be sought wherever possible. The Zoning By-law will include regulations to ensure that the intensity of development is appropriate for individual sites.

With respect to policy 1124, the LI6 Zone category provides for a range of development standards including maximum lot coverage, setbacks, building heights, etc. that are specifically intended to address the intensity of development on given sites. The conceptual plan for development of 1766 Wilton Grove Road envisions three large-scale industrial buildings on the southern portion of the project site. The total proposed gross floor area of warehousing is approximately 54,755m2, with an additional 2,000m2 of accessory office space. The concept plan fits within the standard regulations of the LI6 Zone. It is important to note that the development of 1766 Wilton Grove Road will be subject to Site Plan Control under Section 41 of the Planning Act. The site plan process will provide an opportunity for a complete review of the final plans. The plans will be required to conform with the applicable development regulations of the LI6 Zone.

Form

The conceptual design for 1766 Wilton Grove Road aligns with the intent of Policy 1125 of The London Plan by promoting a high-quality, functional, and visually cohesive form of industrial development. The site layout has been organized to present an attractive and orderly built form along Wilton Grove Road, with building massing and orientation reinforcing the streetscape while maintaining appropriate setbacks for loading and operational needs. The principal façades incorporate modern architectural detailing and high-quality materials, ensuring a professional appearance that enhances the image of the Industrial Place Type. Additionally, through the preservation of significant existing natural areas/features on the northern portion of the site, the development will maintain a green interface with the Highway 401 corridor, supporting an attractive gateway along this major route. Overall, the proposed concept demonstrates sensitivity to the surrounding industrial context and fulfills the functional, aesthetic, and design expectations established by Policy 1125 for new development within the Industrial Place Type.

6.4 Natural Heritage

As outlined on Map 5 of The London Plan, portions of the subject site contain a range of natural heritage features, including a Provincially Significant Wetland (PSW), Significant Woodland, Significant Valleyland, and a Watercourse. The site also falls within the Upper Thames River Conservation Authority (UTRCA) Regulation Limit and is therefore subject to the provisions of the Conservation Authorities Act. In accordance with The London Plan, development is not permitted within significant valleylands, woodlands, or wetlands unless it can be demonstrated that there will be no negative impacts on these natural features or their ecological functions.

Large portions of the property are already zoned Open Space (OS4 and OS5) to provide for the long-term protection of these environmental features based on their previously identified extents. To confirm and refine the delineation of these features, Dancor retained Pinchin Environmental Ltd. to prepare an Environmental Impact Study (EIS) for 1766 Wilton Grove Road. The purpose of the EIS was to evaluate existing environmental conditions, identify and assess natural features on and adjacent to the property, and determine appropriate measures to protect them in accordance with the Environmental Policies of The London Plan. Specifically, the EIS aimed to:

- Identify and characterize natural heritage features and their ecological functions;
- Evaluate potential effects of the proposed development on those features; and
- Recommend appropriate avoidance, mitigation, and enhancement measures to ensure long-term ecological integrity.

Pinchin completed an EIS scoping exercise with the City of London and the UTRCA in 2023 to confirm the scope of field studies and analyses prior to undertaking the full assessment. Field investigations were conducted throughout 2023 in accordance with the agreed-upon scope and timing requirements. Full details of these studies and findings are contained in the EIS submitted in support of the concurrent Official Plan Amendment and Zoning By-law Amendment applications.

To minimize environmental impacts, the proposed development will avoid direct disturbance to the on-site watercourses, recognizing that avoidance is the most effective form of mitigation. The EIS recommends 30 m buffer from the PSW, a 15 m buffer from the valleylands and watercourse, and a 10 m buffer from the woodland, as shown on Figure 4B of the Pinchin EIS. The EIS also recommends restoration planting in appropriate areas on the Site to maintain ecological functions and ensure adverse effects are avoided.

With implementation of the environmental management measures outlined in the EIS - alongside the recommendations of the Stormwater Management Plan and Landscape Plan - the proposed development will preserve the ecological functions of adjacent natural features and enhance the site’s natural landscape through potential restoration and enhancement works post-construction.

To secure these protections, the proposed Zoning By-law Amendment seeks to apply the Open Space (OS5) Zone to all identified natural heritage features and their associated buffer areas and proposed restoration areas in accordance with the recommendations of the EIS. The implementation of the restoration strategy and other detailed mitigation measures will occur through the Site Plan Approval which will require Dancor to enter into a Development Agreement with the City of London.

6.5 Other Issues & Requirements

Servicing & Infrastructure:

A Functional Servicing and Stormwater Management Report prepared by Greck and Associates (Sept 2024) confirms that the proposed industrial development at 1766 Wilton Grove Road can be fully serviced with municipal water, sanitary, and stormwater systems in accordance with the City of London Design Specifications and Requirements Manual (Jan 2024) and all applicable MOECP and UTRCA standards.

Water Servicing

Municipal water supply will be provided via a new 200 mm diameter PVC watermain connected to the existing 900 mm concrete watermain at the intersection of Wilton Grove Road and Cheese Factory Road, requiring approximately 330 m of external servicing. Within the site, the 200 mm main will loop through the property to supply three proposed industrial buildings and ten (10) private hydrants, meeting fire coverage requirements. Domestic water demands were calculated at 5.96 L/s (ADD), 20.88 L/s (MDD), and 46.52 L/s (PHD). Fire flow requirements range from 217 L/s to 283 L/s, exceeding the existing system’s available 158 L/s at 20 psi; this matter is under review with City staff, and the design will be refined at detailed design. The overall servicing strategy meets City standards for pressure, redundancy, and fire protection.

Sanitary Servicing

No existing sanitary infrastructure is available along Wilton Grove Road. The site is proposed to be serviced by a new internal sanitary sewer system discharging via an approximately 390 m external connection to the existing 375 mm municipal sewer at Max Brose Drive and Cheese Factory Road. Due to elevation constraints, flows cannot be conveyed entirely by gravity; therefore, a municipal pumping station is proposed within the right-of-way at the Max Brose/Cheese Factory intersection. The system is designed to convey a total sanitary flow of 17.96 L/s, consistent with City design criteria for industrial land uses (25,000 L/ha/day, 100 persons/ha). All pipe sizes, slopes, and velocities conform to municipal minimum standards and will be finalized through detailed design and City review. Further coordination regarding the specific alignment and design of the external sanitary servicing will be coordinated with the City of London through the Site Plan Approval process.

Stormwater Management

The site lies within the Dingman Creek Subwatershed and is subject to its SWM targets for quality, quantity, erosion, and water balance. The proposed SWM system employs a treatment-train approach including debris/sediment traps at all catchbasins, an Oil-Grit Separator (OGS) providing Level 1 (Enhanced) treatment with 80% TSS removal, and multiple storage components (oversized pipes, ponding areas, dry pond, and roof storage). Post-development flows will be attenuated below pre-development levels for the 2-year to 100-year storm events using orifice and weir controls and distributed storage. As groundwater is encountered between 0.86 m and 1.5 m below grade, infiltration is not feasible; however, a water-balance assessment confirms that clean roof runoff will be directed to the adjacent wetland to maintain hydrologic function. Extended detention and erosion control are achieved with drawdown times of 24–48 hours, satisfying MOECP guidelines.

Conclusion

The proposed servicing and stormwater management strategy provides reliable and efficient municipal servicing consistent with City standards. The system ensures adequate domestic and fire water supply, safe and controlled wastewater conveyance, and sustainable stormwater treatment and attenuation that protect downstream conditions and the adjacent Dingman Creek system.

Archaeological Resources:

Lincoln Environmental Consulting Corp. (LEC) was retained by Dancor Construction Inc. to complete a Stage 1-2 archaeological assessment of 1766 Wilton Grove Road. The Stage 2 property assessment consisted of pedestrian survey at 5m and 1m intervals and test pit survey at 5m and 2.5 intervals. The property assessment was conducted on May 27-28th, 2022, under archaeological consulting license P1289issued to Kara Adams, MSc, of LEC by the MHSTCI. A total of two archaeological sites were located, all identified as undiagnostic surface scatters. Location 1 was identified during pedestrian survey and consists of 26 pieces of lithic material distributed over an approximately 15-meter (East-West) by 50-meter (North-South). The assemblage includes 25 pieces of chipping detritus and 1 undiagnostic projectile point. Location 1 was registered and issued Borden Number AfHg-382. Location 1 (AfHg-382) fulfills Section 2.2 Standard 1.a.i(3) of the 2011 Standards and Guidelines for Consultant Archaeologists (Government of Ontario 2011). Location 1 (AfHg-382) was deemed to retain further heritage value and interest and Stage 3 site specific assessment was recommended.

Location 2 was identified during pedestrian survey and consists of 19 pieces of lithic material distributed over an approximately 10-meter (East-West) by 10-meter (North-South). The assemblage includes 17 pieces of chipping detritus, 1 undiagnostic projectile point, and one undiagnostic biface. Location 2 was registered and issued Borden Number AfHg-383. Location 2 (AfHg-383) fulfills Section 2.2 Standard 1.a.i(3) of the 2011 Standards and Guidelines for Consultant Archaeologists (Government of Ontario 2011). Location 2 (AfHg-383) was deemed to retain further heritage value and interest and a Stage 3 site specific assessment was recommended.

Built Heritage Considerations:

1766 Wilton Grove Road is adjacent to a LISTED property on the City’s Register of Cultural Heritage Resources at 1741 Wilton Grove Road (1865 – vernacular). Per Policy 565 of The London Plan, a heritage impact assessment is required for new development on, and adjacent to, heritage designated properties and properties listed on the Register to assess potential impacts and explore alternative development approaches and mitigation measures to address any impact to the cultural heritage resource and its heritage attributes. Dancor Construction (the proponent) retained Stantec Consulting Ltd. (Stantec) to prepare a Scoped Heritage Impact Assessment (HIA) Memo (Scoped HIA) for the proposed development. A property may only be protected under the OHA when it meets two or more criteria of O. Reg. 9/06. The Study Area at 1741 Wilton Grove Road was found to meet one evaluation criterion and therefore is not considered to have sufficient CHVI to warrant an assessment of impacts, preparation of mitigation measures, or further study.

D-6 Considerations:

The subject property at 1766 Wilton Grove Road is planned for light industrial uses, including a transport terminal, warehousing, and logistics operations. The site is located within the City of London’s Urban Growth Boundary and was previously identified for future industrial growth, reflecting its intended role in supporting the city’s employment lands strategy. As such, the general intent of Development Policies D-6 - designed to provide transitional measures and buffers between sensitive land uses and industrial development - has largely been addressed through the City’s prior designation of this area for industrial purposes.

Immediately to the east of the property is a farm with an associated farm dwelling. While D-6 policies emphasize the need for compatibility between new development and existing sensitive uses, the City’s Official Plan already recognizes the subject site as appropriate for industrial use. Accordingly, potential impacts on adjacent agricultural uses can be mitigated through standard measures such as building orientation, landscaping, and appropriate site planning, rather than through strict application of D-6. For example, adequate setbacks, screening, and site layout will ensure that the proposed light industrial operations function efficiently while minimizing disruption to the neighbouring farm. The proposed LI6 Zone contains enhanced interior side yard setbacks adjacent to residential uses. The proposed Concept Plan complies with those interior yard setback provisions.

In summary, while D-6 considerations are acknowledged, the prior planning framework and designation of the site for industrial development indicate that the property is generally suitable for its intended uses. The proposed development respects adjacent sensitive land uses through thoughtful design and site planning, providing a balance between facilitating industrial growth and addressing interface considerations.

7. CONCLUSIONS

The proposed Official Plan and Zoning By-law Amendments for 1766 Wilton Grove Road will facilitate the logical expansion of Light Industrial lands in a manner consistent with the Provincial Planning Statement (2024), The London Plan, and the City's Industrial Land Development Strategy. The applications support the City's goal of ensuring sufficient supply of market-ready, well-located employment lands that support long-term economic growth.

The requested amendments will redesignate the property from the Future Industrial Growth Place Type to the Light Industrial Place Type and rezone the lands from Agricultural (AG2) to Light Industrial (LI6), Urban Reserve (UR5), and Open Space (OS5). This combination of designations and zones provides an appropriate regulatory framework that balances development opportunities with environmental protection. The Light Industrial Place Type aligns with the intended function of this portion of the Urban Growth Boundary - serving as a transition between the City's existing industrial areas and the surrounding rural landscape while providing flexibility to accommodate a range of light manufacturing, warehousing, and logistics uses in accordance with the conceptual plan prepared on behalf of Dancor.

From an environmental perspective, the project has been carefully designed to conserve the site's key natural heritage features. The accompanying Environmental Impact Study (EIS) prepared by Pinchin Environmental has confirmed the location and ecological significance of these features and established appropriate setbacks and buffers to ensure their long-term protection. All identified features and buffers are proposed to be zoned Open Space (OS5), thereby permanently securing their conservation through the City's zoning framework. The proposed development avoids encroachment into sensitive areas and incorporates ecological restoration and enhancement measures recommended by the EIS, ensuring that the site continues to support ecological function while accommodating compatible industrial use.

Servicing and stormwater management have also been comprehensively addressed through the Functional Servicing and Stormwater Management Report prepared by Greck and Associates. The report confirms that the site can be fully serviced with municipal water, sanitary, and stormwater systems that meet City standards and regulatory requirements. Detailed design and coordination with City staff will occur through the Site Plan Control process to ensure servicing implementation.

Overall, the proposed amendments and conceptual development plan will deliver high-quality employment space in proximity to Highway 401, strengthen the City's industrial base, and contribute to London's economic competitiveness. By respecting and protecting natural heritage features, aligning with all applicable planning policies, and demonstrating feasible municipal servicing, the proposal embodies the principles of good planning and public interest. Accordingly, the proposed Official Plan and Zoning By-law Amendments for 1766 Wilton Grove Road are consistent with the Provincial Planning Statement (2024), conform to The London Plan, and represent sound planning.

REFERENCES

1. Provincial Planning Statement, 2024.
2. City of London Official Plan (2016).
3. City of London Zoning By-law Z.-1.
4. City of London, London City Map (Last updated October 1, 2020).
5. City of London, Record of Pre-Application Consultation, dated August 9, 2022.
6. City of London, Record of Site Plan Consultation (SPC-25012), dated March 3, 2025.
7. Functional Servicing & SWM Report, prepared by Greck & Associates Ltd., dated September 16, 2024.
8. Scoped Environmental Impact Study, prepared by Pinchin Ltd., dated February 21, 2025.
9. Preliminary Geotechnical Investigation, prepared by EXP Services Inc., dated August 5, 2022.
10. Hydrogeological Assessment, prepared by EXP Services Inc., dated February 20, 2025.
11. Stage 1-2 Archaeological Assessment, prepared by Lincoln Environmental Corp., dated May 2023.
12. Scoped Heritage Impact Assessment, prepared by Stantec Consulting Ltd., dated March 2025.



Note: Aerial view of existing conditions at 1766 Wilton Grove Road.

