



2206 BRADLEY AVENUE, LONDON, ON. (COUNTRY PAWS)

PLANNING JUSTIFICATION **REPORT**

Official Plan & Zoning By-law Amendment Application

[siv-ik] PLANNING
/ DESIGN



VERSION 1.0

ISSUED

07.03.2026

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Country Paws Boarding Inc.

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1.0 INTRODUCTION

1.1 Project Background and Purpose of Report

This Planning Justification Report has been prepared by Siv-ik Planning & Design Inc. on behalf of Country Paws Boarding Inc. (the "Applicant") in support of applications for an Official Plan Amendment and Zoning By-law Amendment affecting the lands municipally known as 2206 Bradley Avenue in the City of London. The purpose of this report is to provide an independent professional planning analysis and opinion regarding the proposed amendments and to satisfy the City of London's complete application requirements. The report evaluates the proposal in the context of the Provincial Planning Statement, 2024, The London Plan, and other applicable planning policies and considerations.

The subject property contains a recently constructed large-scale kennel facility (approx. 20,000sf GFA). Country Paws Boarding has provided boarding, daycare, grooming and related animal care services to London-area residents for approximately 30 years. They have recently relocated operations to 2206 Bradley Avenue following the closure of their original facility at 1766 Wilton Grove Road. With the new facility, Country Paws is proposing to evolve the operation into an integrated pet-focused destination known as the "DogPlex", which would include a limited range of complementary commercial and animal-related uses operated in conjunction with the principal kennel use. The proposed additional uses include a pet-related retail component, animal clinic, restaurant/café and other small-scale accessory uses that support and enhance the kennel operation. The proposed concept is intended to function as a unified animal care, recreation and service destination rather than a collection of independent commercial uses.

To facilitate the proposal, an Official Plan Amendment is required to add a site-specific policy to the Farmlands Place Type permitting a limited range of complementary small-scale commercial and animal-related uses operated in conjunction with a principal Kennel use. A corresponding Zoning By-law Amendment is proposed to establish site-specific zoning provisions that recognize and regulate the additional uses while ensuring they remain subordinate and complementary to the principal Kennel use.

As discussed throughout this report, the subject lands possess a unique planning context. While currently designated within the Farmlands Place Type and located outside the City of London's Urban Growth Boundary, City Council has approved Official Plan Amendment No. 166 which would bring the lands into the Urban Growth Boundary and designate them as Future Community Growth Place Type. OPA 166 has been approved by the City of London and is pending approval from the Ministry of Municipal Affairs and Housing. The proposed amendments have been carefully structured to recognize both the current and future planning framework applicable to the lands while ensuring that the proposal does not prejudice future comprehensive planning or urban development opportunities.

This report should be read in conjunction with the supporting application materials, including the Site Concept Plan, Agricultural Impact Assessment, and draft Official Plan and Zoning By-law Amendments.

1.2 Site Overview

The site is municipally described as 2206 Bradley Avenue. The subject lands are located on the north side of Bradley Avenue, approximately 375 metres west of Old Victoria Road within the Bradley Planning District. The site is approximately 7.77 hectares (19.20 acres) in size and contains approximately 310 metres of frontage along Bradley Avenue. From a physical perspective, prior to development, the eastern portion of the site was comprised of open tablelands while the western portion of the site includes an unevaluated woodland feature. Within the wooded area is an existing single detached dwelling. Accordingly, portions of the site are regulated by the Upper Thames River Conservation Authority.

In 2026, the site was developed with the kennel facility which is a permitted use under the existing Agricultural (AG1) Zone that applies to the site. The Kennel facility includes a one-storey kennel building (approx. 1,825m² GFA) outdoor dog runs, two parking lots and a network of mulched trails (refer to SPA-25090). The facility includes direct vehicular access from Bradley Avenue. The proposed site plan has been developed to be entirely outside of a 30m buffer that was established through the Site Plan review process, for the adjacent woodland feature.

Additional details about the site, existing conditions and planning context are summarized in Table 1 below.

Table 1: Site Statistics

Project Site At-A-Glance			
Site Area	7.77ha (19.20 ac.)		
Frontage	310m (1,017 ft.)		
Depth	251.6m (825.4 ft.)		
Existing Use	Single Detached Dwelling & Kennel		
Existing Buildings	Building A	Single Detached Dwelling	Approx. 390m ²
	Building B	Kennel Building	Approx. 1,825m ²
Servicing	Partial Services (Municipal water & private on-site sanitary system)		
Existing Zoning	Agricultural (AG1) Zone		
Official Plan (Map 1)	Farmlands Place Type		

Note: An "Conceptual Site Plan" has been prepared by Siv-ik Planning & Design Inc. and is attached as Appendix 'A' to this report for further reference. The concept plan has been prepared based on the as-built conditions of the property documented during the recent construction and final approval process for the Kennel Building (SPA24-065).

Figure 1: Site Overview



Site Photos: Top-down aerial view



Site Photos: SE perspective.



1.3 Planning History

The subject lands were formerly located within the Township of Westminster and became part of the City of London through the municipal boundary restructuring that occurred in 1993. Following annexation, the property was incorporated into the City's Zoning By-law and zoned AG1 (Agricultural). Importantly, both at the time of annexation and today, the AG1 Zone has permitted a Kennel as-of-right. The Zoning By-law defines a Kennel as a *lot, building or structure where three or more domesticated animals are housed, groomed, bred, boarded, trained or sold, and which may also provide minor medical treatment.*

The continued recognition of a kennel as a permitted use in the AG1 Zone is significant in the context of this application. While provincial planning policy has evolved considerably since 1993 with increasing emphasis on protecting Prime Agricultural Areas from non-agricultural development, the existing zoning framework has consistently recognized a kennel as an appropriate permitted use on these lands. Accordingly, the proposed Official Plan and Zoning By-law Amendments do not seek to establish a new principal non-agricultural land use within the agricultural area, but rather facilitate the incremental evolution and expansion of an already permitted use through the introduction of complementary, site-specific ancillary uses.

Country Paws acquired the property in 2014 with the intention of relocating and expanding its existing operation from 1766 Wilton Grove Road. The relocation was necessary as the Wilton Grove property had previously been incorporated into London's Urban Growth Boundary and identified for future industrial development. Following the sale of the 1766 Wilton Grove property, Country Paws proceeded with the design of a purpose-built kennel facility for 2206 Bradley Avenue that complied with the permissions of the existing AG1 Zone.

In 2024, the owners submitted Site Plan Approval application SPA24-065 for the development of a new 1,825 m² kennel building together with extensive outdoor play areas, walking trails and supporting site infrastructure. The proposal reflected Country Paws' vision of creating a destination pet care facility, commonly referred to as the "Dogplex." The Site Plan application was approved in 2025, with construction commencing later that year. At the time of writing, construction of the new facility is nearing completion.

As the project has evolved, the owners have identified a market opportunity to introduce a limited range of complementary uses, including pet-oriented retail, a café/restaurant, veterinary clinic and other ancillary services that would enhance the overall operation and customer experience. Through discussions with City staff, it was determined that some of the proposed complementary uses, while functionally integrated with the kennel, exceeded the scope of what could be considered "accessory" under Section 4.1 of the City of London Zoning By-law. Consequently, in April 2026, Country Paws initiated a pre-application consultation for the Official Plan and Zoning By-law Amendments that are the subject of this report.

The lands are currently designated Farmlands Place Type under The London Plan. However, in December 2025, City Council adopted Official Plan Amendment 166, which proposes to incorporate the property into the Urban Growth Boundary and re-designate the lands to Future Community Growth Place Type, subject to Provincial approval. Given the current status of OPA 166, this Planning Justification Report evaluates the proposal primarily against the existing Prime Agricultural and Farmlands Place Type policy framework. Nevertheless, where relevant, the report also considers the new policy context established through OPA 166, recognizing that it represents Council's adopted long-term planning vision for the subject lands.



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2.0 SITE CONTEXT

2.1 Surrounding Land Use

As noted in Section 1.0 of this report, the site is located on the north side of Bradley Avenue, approximately 375 metres west of Old Victoria Road. The subject site is located within the Bradley Planning District in the southeast portion of the City of London. The surrounding area is predominantly agricultural in character, although it is situated immediately adjacent to several of the City's planned urban growth areas. The property has frontage along Bradley Avenue, which is identified in The London Plan (Map 3) as an Urban Thoroughfare and designated as a "truck route".

The lands immediately east of the subject property (2643 Old Victoria Road) consist of a 46-acre agricultural parcel containing actively cultivated farmland and a single detached dwelling. Further to the northeast, beyond the adjacent agricultural parcel, is a cluster of rural residential estate lots located approximately 240 metres from the subject property's northern boundary, extending in a linear fashion along Old Victoria Road northward to Commissioners Road E/Hamilton Road.

The lands immediately north include a large (171-acre) agricultural holding comprised mainly of actively cultivated farmland. This parcel extends north to Commissioners Road East, which currently forms the limit of the Urban Growth Boundary.

To the west, the adjacent property is occupied by an agricultural operation that includes a single detached dwelling and a collection of agricultural buildings and structures including a small horse barn.

On the south side of Bradley Avenue are three large agricultural parcels extending south toward Highway 401. While these lands remain in agricultural use today, they have been identified for future employment growth within the City's Official Plan. Further east, beyond Old Victoria Road, the surrounding area transitions into the Innovation Park employment area, which contains a mix of existing industrial, research and employment uses together with lands planned for future industrial development.

Overall, the area within approximately 800 metres of the subject site is characterized by a predominance of agricultural uses interspersed with rural residential properties, natural heritage features and future urban development lands. Consistent with City Council's adoption of Official Plan Amendment No. 166, the broader area is anticipated to transition over the long term, with lands north of Bradley Avenue planned for future residential and community growth and lands south of Bradley Avenue planned for future industrial development.

Several livestock facilities (active & unoccupied) are located within the surrounding area (1.5km). Minimum Distance Separation (MDS) calculations have been completed as part of the accompanying Agricultural Impact Assessment to evaluate potential land use compatibility considerations.

Figure 2: Surrounding Land Use Map (800m)



2.2 Site Analysis

The subject property comprises approximately 7.77 hectares with approximately 310 metres of frontage along Bradley Avenue. The lands are generally rectangular in configuration and benefit from direct access to Bradley Avenue through a single, purpose-built entrance designed to accommodate both customer and service vehicles. The site is serviced by municipal water and an approved private on-site sewage system that were established through the recently approved Site Plan application.

The property is currently occupied by a newly constructed, purpose-built dog boarding and daycare facility that is nearing completion. The development centres around a one-storey kennel building containing approximately 1,825 m² of gross floor area together with supporting site infrastructure, including outdoor enclosed activity areas, walking trails, parking areas, stormwater management facilities, internal drive aisles and a proposed storage building. An existing detached dwelling remains on the western portion of the property and is physically separated from the principal kennel operation. The proposed veterinary clinic, café, retail area and other complementary uses are all intended to be accommodated within or immediately adjacent to this established development area, without requiring a significant expansion of the overall development footprint.

A defining characteristic of the site is the significant investment that has already been made to establish the kennel operation. The recently approved facility, together with its associated outdoor activity areas and supporting infrastructure, occupies the majority of the developable portion of the property and represents a substantial long-term investment in the site. As a result, much of the property has already transitioned from its historic agricultural condition to a specialized rural animal care/recreation facility specifically designed to accommodate the principal kennel use.

The western portion of the property contains a mature woodland. Through the Site Plan Approval process, the development was intentionally designed to avoid this environmental feature by maintaining a 30-metre ecological buffer together with an Environmental Management Plan that protects the retained woodland during both construction and ongoing operation. This feature provides a permanent edge to the developed portion of the site while contributing to visual buffering and separation from adjacent properties.

The overall site design has clustered buildings, parking areas and active outdoor facilities within a compact development envelope located toward the frontage of the property, while maintaining substantial setbacks from surrounding agricultural lands and rural residential uses. The proposed complementary uses will be integrated within this existing development envelope and utilize the site's established access, servicing and parking infrastructure. Consequently, no significant expansion of the site's physical footprint is required to accommodate the uses being enabled by the Official Plan and Zoning By-law Amendments.

Overall, the physical characteristics of the property reflect a site that has already been comprehensively planned and developed around a modern kennel operation. Existing servicing, access, environmental protection measures, site layout and substantial separation distances collectively provide a strong physical framework for accommodating the limited range of complementary uses proposed through this application.

Figure 3: Site Analysis



3.0 POLICY & REGULATORY FRAMEWORK

The following section of this report provides an overview of the applicable planning policy & regulatory framework that currently guides land use and development on the subject site. In this case, the key applicable statutory documents include the Provincial Planning Statement (2024), the City of London Official Plan (The London Plan) and the City of London Comprehensive Zoning By-law Z.-1. The following policies and regulations inform and guide the professional planning analysis of the proposal provided in Section 5.0 below.

3.1 Provincial Planning Statement, 2024:

The Provincial Planning Statement, 2024 (PPS) came into effect on October 20, 2024 and provides the overarching provincial land use policy framework governing planning decisions across Ontario. The PPS establishes policies intended to promote strong communities, a competitive economy and a healthy natural environment while recognizing the diversity of communities across the Province. Pursuant to Section 3 of the Planning Act, decisions affecting planning matters "shall be consistent with" the Provincial Planning Statement.

The PPS addresses a broad range of planning matters, including settlement areas, infrastructure, housing, economic development, agriculture, natural heritage, cultural heritage and public health and safety. The policies are intended to be read in their entirety, recognizing that individual policies are interconnected and are to be applied in a manner that supports the overall policy direction of the document.

Given the location of the subject lands within a Prime Agricultural Area, the agricultural policies contained within Section 4.3 of the PPS provide the principal policy framework applicable to the proposed Official Plan and Zoning By-law Amendments. In particular, Section 4.3 establishes policies respecting permitted uses within Prime Agricultural Areas and identifies the circumstances under which non-agricultural uses may be considered.

In addition to the agricultural policies, Section 2.5 establishes policies respecting rural areas and economic development, including opportunities for economic activities within Prime Agricultural Areas in accordance with Section 4.3. Further, Section 3.6 establishes the provincial policy framework respecting the provision of sewage and water services to support development. Collectively, these policies provide the broader provincial planning context within which the proposed Official Plan and Zoning By-law Amendments are to be evaluated. The relevant provisions of Sections 2.5, 3.6 and 4.3 are reviewed in greater detail in Section 5.0 of this report.

3.2 The London Plan:

The subject lands are designated Farmlands Place Type in The London Plan, as illustrated on Figure 4. The Farmlands Place Type applies to lands comprising the City's Prime Agricultural Area and establishes the principal municipal policy framework governing land use and development within these areas.

The Farmlands Place Type recognizes agriculture as the predominant land use and identifies the agricultural land base as an important long-term resource for the City of London. The policies are intended to support a productive and economically sustainable agricultural sector while providing direction for land use planning, development, infrastructure, environmental protection and other activities occurring within the agricultural area.

The Farmlands Place Type includes policies respecting its overall vision and objectives, permitted land uses, agricultural operations, lot creation, servicing, natural heritage features, infrastructure, transportation and land use compatibility. Together, these policies provide the framework for managing growth and development within the City's Prime Agricultural Area while maintaining its long-term agricultural function.

The policies of the Farmlands Place Type provide the principal municipal policy framework applicable to the subject lands and are reviewed in greater detail in Section 5.0 of this report.

Figure 4: Official Plan - Place Types (Map 1)



Although the subject lands are currently designated Farmlands Place Type, they are also affected by Official Plan Amendment No. 166 (OPA 166), which was adopted by London City Council in December 2025 and is currently awaiting Provincial approval. As illustrated on Figure 5, OPA 166 proposes to incorporate the subject lands into the City's Urban Growth Boundary and re-designate them Future Community Growth Place Type.

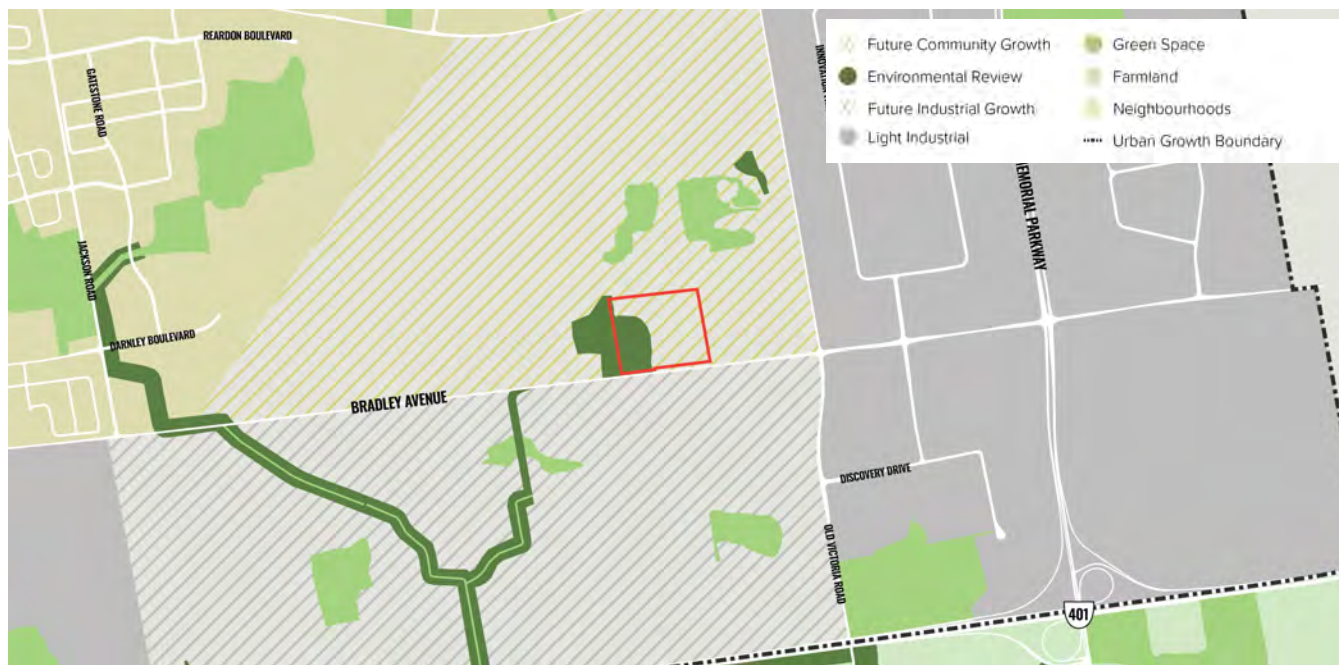
The Future Community Growth Place Type applies to lands identified for long-term urban expansion but which have not yet been comprehensively planned for development. The policies recognize that these lands represent future urban communities and establish a framework intended to preserve planning flexibility until more detailed planning has been completed.

The Future Community Growth Place Type contemplates the preparation of comprehensive secondary plans and related planning studies to establish the future road network, land use pattern, servicing strategy, parks and open space system, environmental protection measures and other community infrastructure required to support urban development. Until such planning has been completed, the policies are intended to ensure that development occurring within these areas does not compromise or prejudice the orderly and coordinated planning of future communities.

As OPA 166 has not yet received Provincial approval, the Farmlands Place Type remains the current policy framework applicable to the subject lands. Nevertheless, the proposed Future Community Growth designation provides important planning context with respect to City Council's adopted long-term vision for the property and

the surrounding area. Accordingly, where appropriate, Section 5.0 of this report considers the proposal within both the existing policy framework and the future planning context established through OPA 166.

Figure 5: OPA 166 - Future Place Types/Urban Growth Boundary



In addition to the Place Type policies, The London Plan provides a framework for the establishment of Specific Area Policies. These policies recognize that, in certain circumstances, site-specific planning considerations may warrant an alternative policy approach while maintaining the overall intent and integrity of the broader Official Plan.

Policies 1729 through 1734 establish the purpose, application and evaluation criteria for Specific Area Policies. These policies provide direction respecting the circumstances in which a site-specific policy may be considered, the matters that should be addressed through such policies, and the relationship between a Specific Area Policy and the broader policy framework of The London Plan.

Specific Area Policies are implemented by identifying the subject lands on Map 7 – Specific Policy Areas and establishing site-specific policy direction applicable only to those lands. The policies are intended to address unique site circumstances while ensuring that the objectives and policy framework of the surrounding Place Type continue to apply generally.

As discussed in Section 4.0 of this report, the proposed Official Plan Amendment seeks to establish a site-specific policy for the subject lands through the Specific Area Policy provisions of The London Plan. The applicable policies respecting Specific Area Policies are reviewed in greater detail in Section 5.0 of this report.

3.3 City of London Comprehensive Zoning By-law Z. -1:

The subject lands are currently zoned Agricultural (AG1) under the City of London Zoning By-law No. Z.-1. The AG1 Zone is the implementing zoning applicable to lands designated Farmlands Place Type and establishes the permitted uses and performance standards governing development on the subject property.

The AG1 Zone is intended to recognize and protect agricultural lands while permitting a range of agricultural, agriculture-related and rural land uses that are compatible with the agricultural area. In addition to agricultural uses, the zone permits a variety of rural uses, including a Kennel, which has been a permitted use on the subject lands since the property was incorporated into the City of London following municipal annexation in 1993.

Section 2 of the Zoning By-law defines a Kennel as:

"Any lot, building or structure, on or within which three or more domesticated animals are housed, groomed, bred, boarded, trained or sold and which may offer provisions for minor medical treatment."

In addition to identifying permitted uses, the AG1 Zone establishes regulations respecting minimum lot area and frontage, building setbacks, lot coverage, building height and other development standards applicable to lands within the zone. The Zoning By-law also contains general provisions applicable to all zones, including Section 4.1 respecting accessory uses, buildings and structures.

The AG1 Zone, together with the general provisions of the Zoning By-law, establishes the regulatory framework applicable to the subject lands. The proposed Zoning By-law Amendment would retain the underlying AG1 Zone while introducing a site-specific Special Provision applicable only to the subject property. The relevant zoning provisions are reviewed in greater detail in Section 5.0 of this report.

Table 2: Existing Zoning Breakdown

Regulation	AG1
Permitted Uses	a) Agricultural uses; b) Livestock facilities provided that such facilities are located at least 300 metres from the City's Urban Growth boundary; or in accordance with the MDS regulations, whichever is greater; c) Farm dwelling; d) Forestry uses; e) Kennels ; f) Conservation lands; g) Wayside pits; h) Nursery; i) Passive recreation use; j) Farm market; k) Small Wind Energy Conversion System; l) Greenhouse Farm
Lot Area (min.)	40.0 ha.
Lot Frontage (min.)	200.0 m
Front & Exterior Yard Depth (min.)	15m
Interior Side & Rear Yard Depth (min.)	15m
Residential Building Height (max.)	12m
Other Building Height (max.)	15m
Lot Coverage (max.)	20%

4.0 THE PROPOSAL

4.1 Existing & Proposed Development:

As generally described in Section 1.0 of this report, the subject lands are currently being developed as a purpose-built dog boarding and daycare facility (i.e. kennel) in accordance with Site Plan Approval application SPA24-065. Construction of the approved development is substantially complete and includes a one-storey kennel building containing approximately 1,825 m² of gross floor area, outdoor fenced activity areas, walking trails, parking areas, a storage building, stormwater management facilities, an existing detached dwelling and associated site servicing. The principal kennel operation, including boarding, daycare, grooming and related animal care services, is already permitted within the existing AG1 Zone and is not the subject of the current planning applications.

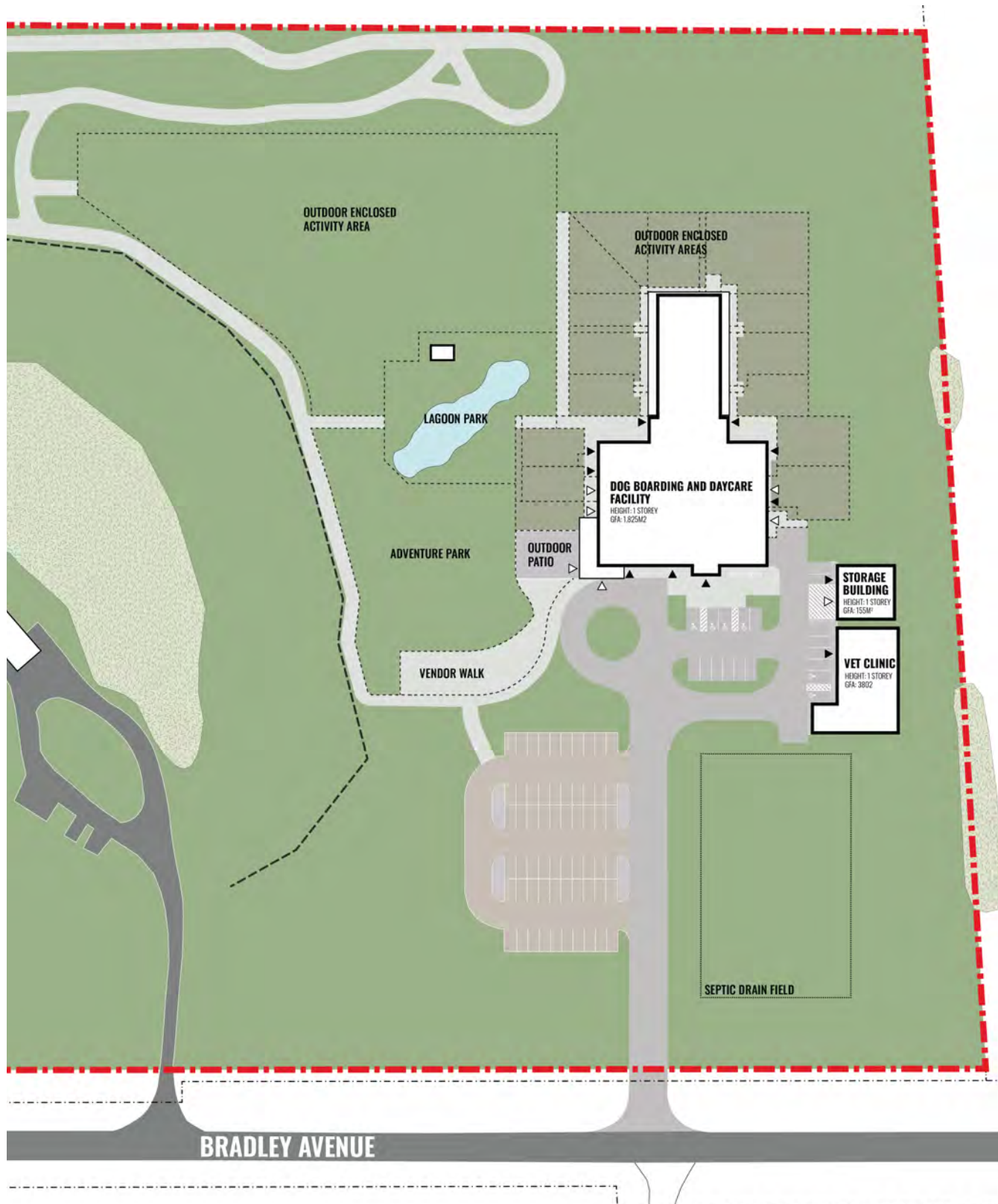
The Official Plan and Zoning By-law Amendments are intended to build upon this approved development by permitting a carefully defined range of complementary commercial and animal-related uses that enhance the overall operation of the facility while remaining subordinate to the principal kennel use. The proposed additional uses include a small-scale veterinary clinic, café/restaurant with outdoor patio, and limited outdoor vendor areas for the seasonal sale of food/beverage and pet-related products. These complementary uses are designed to support visitors/patrons utilizing the kennel and its recreational facilities. Collectively, these complementary uses are intended to create an integrated destination for pet owners while improving the long-term functionality and viability of the existing business.

- ▶ Animal Clinic: 380m²
- ▶ Restaurant/Cafe: 190m²
- ▶ Outdoor Vendor Area: 500m²

Importantly, the proposal does not contemplate a significant expansion of the approved site development. The proposed uses are intended to be accommodated within a cluster of buildings and outdoor areas in close proximity to the main building and as part of an integrated overall site design. Existing site access, parking areas, servicing infrastructure, landscaping and environmental protection measures established through the approved Site Plan will remain the same and are sufficient support the proposed additional uses/development.

The accompanying Official Plan Amendment and implementing site-specific AG1 Special Provision have been intentionally drafted to ensure that the proposed complementary uses remain secondary to, and functionally integrated with, the principal kennel operation. The proposed zoning establishes detailed regulations respecting the scale, location and operation of the complementary uses and expressly requires that they operate only in conjunction with the kennel. Accordingly, the proposal represents an evolution of an already approved and legally established use rather than the establishment of a new standalone commercial development.

Figure 6: Simplified Site Plan Excerpt



4.2 Proposed Official Plan Amendment:

The proposed Official Plan Amendment is intended to establish a site-specific policy for the subject lands within the Farmlands Place Type through the addition of a Specific Policy Area to Map 7 – Specific Policy Areas – of The London Plan. The complete draft Official Plan Amendment is included in Appendix B of this report.

Rather than modifying the broader policy framework applicable to the Farmlands Place Type, the amendment has been intentionally structured as a site-specific policy recognizing the unique circumstances of the subject lands. The existing kennel is already a permitted use within the implementing AG1 Zone and has recently been established through the approved Site Plan process. The proposed Official Plan Amendment therefore focuses exclusively on permitting a limited range of complementary commercial and animal-related uses that support and enhance the principal kennel operation without altering the broader intent of the Farmlands Place Type.

The proposed policy does not establish broad commercial permissions. Instead, it identifies a limited range of complementary uses, including an animal clinic, pet-related retail, restaurant/café and other similar uses, while requiring that they operate in conjunction with the principal kennel use. The amendment further establishes the overarching policy direction that these uses are to remain subordinate and complementary in both scale and function and are to operate as part of an integrated animal boarding and care establishment rather than as independent commercial uses.

The proposed Official Plan Amendment intentionally establishes the policy framework rather than prescribing detailed operational requirements. Instead, the amendment directs the implementing Zoning By-law to include regulations that ensure the additional uses remain subordinate to the principal kennel operation, that their scale and intensity remain appropriately limited, and that they continue to operate as an integrated component of the overall facility. This two-tiered approach recognizes the distinct roles of the Official Plan and Zoning By-law by establishing the overall planning intent at the policy level while relying upon the implementing zoning to regulate the detailed operation of the proposed uses.

Collectively, the proposed Official Plan Amendment establishes a tailored policy framework that recognizes the unique circumstances of the subject property while ensuring that the additional permissions remain intrinsically linked to the principal kennel operation. The amendment is therefore intended to facilitate the continued evolution of an already established and lawfully permitted use without creating broader commercial land use permissions or undermining the overall intent of the Farmlands Place Type.

4.3 Proposed Zoning By-law Amendment:

The proposed Zoning By-law Amendment is intended to implement the site-specific Official Plan Amendment through the application of an Agricultural Special Provision (AG1(□)) Zone. The complete draft Zoning By-law Amendment is included in Appendix B of this report.

The amendment has been intentionally structured to retain the existing AG1 Zone while introducing a limited range of additional permissions specific to the subject property. The principal kennel use and all existing AG1 regulations will continue to apply. Rather than fundamentally altering the Agricultural Zone, the proposed Special Provision establishes a narrowly tailored regulatory framework that permits a limited range of complementary commercial and animal-related uses while ensuring they remain secondary to, and integrated with, the principal kennel operation.

To achieve this objective, the proposed Special Provision incorporates several site-specific regulations intended to appropriately contain the scale, function and operation of the additional uses, including:

- **Additional Permitted Uses:** Animal Clinic, Restaurant and Retail Store shall only be permitted in conjunction with a principal Kennel use and shall not operate on a standalone basis.

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- **Maximum Gross Floor Area:** The combined gross floor area of the proposed restaurant/cafe and animal clinic shall not exceed **35%** of the gross floor area of the principal kennel building.
 - **Outdoor Vendor Area:** Outdoor vendor areas associated with the principal kennel use shall be permitted for the sale of food, beverages and pet-related merchandise, to a maximum area of **500 m²**.
 - **Site Organization:** All buildings associated with the complementary uses shall be clustered within **60 metres** of the principal building and shall not include separate vehicular access points from Bradley Avenue.

Collectively, these regulations have been developed to reinforce the complementary nature of the proposal while preventing the evolution of the property into an independent commercial destination. The proposed zoning intentionally limits both the scale and physical extent of the additional uses, ensures they remain functionally integrated with the principal kennel operation, and requires that they rely upon the existing site layout, access and servicing infrastructure. In doing so, the proposed Special Provisions establish a clear and enforceable regulatory framework that supports the continued evolution of the kennel while maintaining the overall intent of the Agricultural Zone and protecting against unintended future commercial expansion.

5.0 PLANNING ANALYSIS

The following planning analysis examines the proposed Official Plan and Zoning By-law Amendments with respect to the Provincial Planning Statement, 2024, The London Plan and the City of London Zoning By-law. The analysis focuses on the planning rationale for permitting a limited range of complementary commercial uses in association with the existing lawfully permitted kennel use on the subject lands.

As outlined in Section 4.0 of this report, the proposed amendments are not intended to establish a new standalone commercial development on the site. Rather, they are intended to facilitate the evolution of an existing kennel operation through the introduction of carefully tailored ancillary uses that support the primary operation, enhance the overall customer experience and support the long-term viability of the business. The proposed Official Plan and Zoning By-law have been intentionally structured to ensure that these complementary uses remain subordinate to, and functionally integrated with, the principal kennel use.

It is also important to recognize that the subject lands have already received Site Plan Approval for the development of the new kennel facility, and construction is substantially complete. Accordingly, this application does not seek approval for a new principal land use or a significant expansion of the approved development footprint. Instead, the focus of the planning analysis is on whether the proposed complementary uses represent good planning, having regard for the existing and future policy framework applicable to the lands, and whether the proposed policy and zoning framework has been appropriately structured to ensure desirable long-term planning outcomes.

5.1 Provincial Planning Statement, 2024

The Provincial Planning Statement, 2024 ("PPS") came into effect on October 20, 2024 and provides policy direction on matters of provincial interest relating to land use planning and development in Ontario. Issued under Section 3 of the Planning Act, all decisions affecting planning matters shall be consistent with the policies of the PPS.

The PPS establishes a policy framework intended to support healthy and complete communities, promote economic development, protect resources of provincial interest, and facilitate long-term prosperity while balancing social, environmental and economic considerations.

The subject lands are currently located within a Prime Agricultural Area and therefore the agricultural land use policies of Section 4.3 of the PPS are particularly relevant to the evaluation of the proposed Official Plan and Zoning By-law Amendments. In addition, policies related to economic development, land use compatibility, and servicing are applicable to the proposal.

As discussed throughout this report, the proposal does not seek to establish a standalone commercial development within the agricultural area. Rather, it seeks to permit a limited range of accessory commercial and animal-related uses that are complementary to, integrated with, and operated in association with an existing Kennel (non-agricultural use) on the property.

The following sections provide an analysis of the relevant PPS policies and demonstrate that the proposed amendments are consistent with the Provincial Planning Statement, 2024.

4.3 Agriculture

Chapter 4 of the Provincial Planning Statement, 2024 addresses the wise use and management of resources, including the protection of Ontario's prime agricultural land base for long-term agricultural use. Consistent with this objective, Section 4.3.2 establishes the range of uses that are generally contemplated within Prime Agricultural Areas and states:

"In prime agricultural areas, permitted uses and activities are: agricultural uses, agriculture-related uses and on-farm diversified uses based on provincial guidance. Proposed agriculture-related uses and on-farm diversified uses shall be compatible with, and shall not hinder, surrounding agricultural operations."

The proposed accessory commercial and animal-related uses do not constitute agricultural uses, agriculture-related uses, or on-farm diversified uses as contemplated by Section 4.3.2.1 of the PPS. While the proposed uses are intended to operate in conjunction with and remain subordinate to the existing Kennel use, they are not directly related to agricultural production and therefore do not fall within the categories of uses expressly contemplated by Section 4.3.2.1.

Accordingly, the proposal must be evaluated as a non-agricultural use within a Prime Agricultural Area. The PPS expressly contemplates the establishment of non-agricultural uses in Prime Agricultural Areas, provided that the criteria of Section 4.3.5 can be satisfied. Therefore, the relevant policy question is not whether the proposed use qualifies as an agricultural use, but rather whether the proposal satisfies the applicable tests for non-agricultural development within a Prime Agricultural Area.

The following section evaluates the proposal against the criteria of Section 4.3.5 of the PPS, 2024.

Limited Non-Residential Use?

Section 4.3.5.1 b) of the PPS permits limited non-residential uses within Prime Agricultural Areas, subject to the satisfaction of a number of criteria. Within the context of the PPS, a limited non-residential use may include commercial, industrial, institutional or recreational uses but excludes residential development.

OMAFRA Publication 851 – Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas provides that the term "limited" should be evaluated in the context of the amount of land removed from agricultural production, the scale of development proposed, and the extent to which the use remains appropriately contained and does not result in broader patterns of non-agricultural development within the agricultural area.

With respect to the guidance above, the proposal constitutes a limited non-residential use.

The proposed amendment does not establish a new standalone commercial node or permit a broad range of independent commercial uses. Rather, it permits a limited range of accessory commercial and animal-related uses that are complementary to and operated in conjunction with an existing Kennel use on the property. The proposed Official Plan and Zoning By-law Amendments contain specific provisions requiring that all additional uses remain accessory, subordinate and integrated with the principal Kennel operation. The proposed uses cannot operate as standalone uses independent of the existing Kennel.

The subject property already contains an established large-scale kennel operation, associated buildings, parking areas, outdoor play areas and supporting infrastructure. The proposal largely builds upon and enhances an existing operation rather than introducing a new land use pattern into the agricultural area. Furthermore, the

additional uses are intended to occupy a limited portion of the site and are subject to site-specific zoning controls respecting scale, location and operation.

The proposal will not result in the fragmentation of a farm operation or the loss of actively cultivated agricultural land. The existing kennel operation, associated buildings and extensive outdoor recreation areas already occupy the lands and eliminate the property's suitability for conventional agricultural production. As demonstrated in the Agricultural Impact Assessment, no actively farmed lands will be removed from agricultural production as a result of the proposed amendments.

Accordingly, the proposal represents a limited non-residential use for the purposes of Section 4.3.5.1 b) of the PPS, 2024.

Do the Lands Constitute a Specialty Crop Area?

Within the context of the PPS, 2024, Specialty Crop Areas are defined as areas within the agricultural land base where specialty crops such as tender fruits, grapes, greenhouse crops, vegetable crops, and other similar high-value agricultural products are predominantly grown.

The subject lands do not comprise a Specialty Crop Area, nor are they identified within any provincially recognized Specialty Crop Area.

Accordingly, this criterion is satisfied.

Does the Proposal Comply with the Minimum Distance Separation Formulae?

The Minimum Distance Separation ("MDS") Formulae are a land use planning tool intended to minimize land use conflicts between livestock operations and sensitive land uses. The PPS requires that new or expanding land uses within Prime Agricultural Areas comply with the applicable MDS Formulae.

An independent MDS review has been completed as part of the Agricultural Impact Assessment and confirms that the proposed development complies with the applicable MDS requirements.

The lands immediately west of the subject property at 2122 Bradley Avenue contain a small equestrian facility with a horse barn. In accordance with the OMAFRA Minimum Distance Separation (MDS I) Formulae and Guidelines, the applicable minimum separation distance from the existing livestock facility to a proposed Type B land use is approximately 162 metres.

The proposed complementary commercial uses, including the veterinary clinic and café/restaurant, are all located in excess of 280 metres from the existing horse barn. Accordingly, these components of the proposal satisfy the applicable MDS I separation requirements.

Furthermore, the proposed complementary uses are clustered around the existing kennel building within the developed portion of the property, thereby maximizing separation and minimizing the potential for land use conflicts. The proposal will not constrain the continued operation of the adjacent livestock facility or its ability to undertake normal farm practices.

Accordingly, the proposal complies with the applicable Minimum Distance Separation Formulae and satisfies this criterion of Section 4.3.5.1 b) of the PPS, 2024.

Is There an Identified Need for Additional Land to Accommodate the Proposed Use?

Section 4.3.5.1 b)(3) of the PPS requires that there be an identified need within the planning horizon established by the applicable Official Plan for additional land to accommodate the proposed use.

Unlike many applications involving non-agricultural uses in Prime Agricultural Areas, the proposal does not require the designation, rezoning, or development of additional lands to accommodate the use. The subject property is an existing lot of record containing an established Kennel operation which is already permitted by the existing AG1 Zone. Furthermore, the property has been the subject of recent planning approvals establishing the overall site layout, buildings, parking areas, servicing infrastructure and outdoor activity areas associated with the principal Kennel use. The proposed Official Plan and Zoning By-law Amendments do not seek to expand the site boundary, create additional development parcels, or remove additional agricultural lands from production.

Rather, the proposal seeks permission for a limited range of accessory commercial and animal-related uses that are integrated with and complementary to the existing Kennel operation. These uses are intended to occur within the context of an already established and approved development footprint and do not create a demand for additional land beyond that already occupied by the principal use.

In this regard, the proposal differs fundamentally from a typical non-agricultural use application where agricultural lands are being converted to accommodate a new use. The lands have already been converted to a non-agricultural use and the proposed amendments merely expand the range of activities that may occur in conjunction with that existing operation.

Accordingly, it is my opinion that the proposal satisfies the intent of Section 4.3.5.1 b)(3) as no additional agricultural land is required to accommodate the proposed use and no additional land is being removed from agricultural production as a result of the application.

Are There Reasonable Alternative Locations Which Avoid Prime Agricultural Areas or Utilize Lower Priority Agricultural Lands?

Section 4.3.5.1 b)(4) of the PPS requires consideration of alternative locations and requires that:

- i. there are no reasonable alternative locations which avoid Prime Agricultural Areas; and
- ii. there are no reasonable alternative locations in Prime Agricultural Areas with lower priority agricultural lands.

With regard to the criteria above, the principal Kennel use is already permitted by the existing AG1 Zone and is lawfully established on the subject property. Furthermore, the property has been the subject of recent planning approvals establishing the overall development concept, buildings, parking areas, servicing infrastructure, outdoor recreation areas and other site improvements associated with the Kennel operation. The proposed Official Plan and Zoning By-law Amendments do not seek to relocate the use, establish a new commercial development area, or introduce an independent land use unrelated to the existing operation. Rather, the amendments seek to permit a limited range of accessory commercial and animal-related uses that are integrated with and complementary to the principal Kennel use.

The proposed additional uses derive their purpose and function from the existing Kennel operation. The proposed animal clinic, pet-related retail uses, restaurant/café and other complementary uses are primarily intended to serve kennel patrons, visitors and pet owners utilizing the facility and are specifically intended to operate as part of a unified animal care and recreation destination. The proposed Official Plan and Zoning By-law Amendments have been structured to ensure these uses remain subordinate to and operate in conjunction with the principal Kennel use.

Given that the principal use is already established and permitted on the subject lands, it is my opinion that there are no reasonable alternative locations that would achieve the intended planning objective. Relocating the complementary uses to another property would sever their functional relationship with the Kennel operation and undermine the integrated nature of the proposal.

Furthermore, the proposal does not require the identification or conversion of additional agricultural lands. The lands required to accommodate the principal Kennel operation have already been approved and developed. The proposed amendments merely permit an expanded range of complementary activities within the context of an existing and approved development.

Accordingly, it is my opinion that there are no reasonable alternative locations that would better satisfy the objectives of the proposal and that the subject property represents the most appropriate location for the proposed complementary commercial and animal-related uses.

Furthermore, while alternative location analysis is largely academic in this instance given that the principal Kennel use is already established on the subject lands, it is also my opinion that the property exhibits many of the characteristics commonly associated with lower priority agricultural lands.

The subject property is an existing lot of record that is substantially smaller than a typical agricultural parcel and is already occupied by an established Kennel operation and associated site improvements. In addition, a significant portion of the property is constrained by environmental features and associated ecological buffers, further limiting the amount of land available for agricultural production and reducing the site's overall agricultural capability. The Agricultural Impact Assessment confirms that the proposal will not remove actively cultivated agricultural lands from production.

It is also noteworthy that City Council has adopted Official Plan Amendment No. 166 which would bring the subject lands into the Urban Growth Boundary and designate them as Future Community Growth, subject to final Provincial approval. While the current planning framework remains applicable until such time as provincial approval is obtained, Council's decision reflects a long-term planning determination that these lands are intended to accommodate future urban growth rather than remain part of the City's long-term agricultural land base. Accordingly, the proposed amendments do not create or introduce a new constraint on lands intended for long-term agricultural preservation.

These considerations further support the conclusion that the subject property represents an appropriate location for the proposed accessory commercial and animal-related uses.

Avoidance, Minimization and Mitigation of Agricultural Impacts

Section 4.3.5.2 of the PPS requires that impacts from any new or expanding non-agricultural uses on the agricultural system be avoided or, where avoidance is not possible, minimized and mitigated through an Agricultural Impact Assessment or equivalent analysis.

An Agricultural Impact Assessment has been prepared in support of the application and demonstrates that any potential impacts on the surrounding agricultural system are largely avoided. The Agricultural Impact Assessment also recommends a series of measures and land use controls which have been incorporated into the proposed planning framework, including site-specific Official Plan and Zoning By-law provisions intended to ensure the scale and operation of the proposed uses remain appropriately limited and compatible with the surrounding agricultural area.

In evaluating potential agricultural impacts, it is important to distinguish between impacts associated with the principal Kennel use and impacts associated with the proposed accessory commercial and animal-related uses. The principal Kennel use is already permitted by the existing AG1 Zone and has been established on the subject property through a separate planning approval process. The site has also been the subject of recent site plan approvals establishing the overall development footprint, buildings, parking areas, servicing infrastructure and outdoor activity areas associated with the Kennel operation. Accordingly, the vast majority of any potential agricultural impact considerations associated with the proposal are attributable to the principal Kennel use rather than the accessory uses proposed through this application.

The proposed Official Plan and Zoning By-law Amendments do not introduce a new standalone non-agricultural use, create a new development parcel, or significantly expand the approved development footprint of the site. Rather, they permit a limited range of complementary commercial and animal-related uses that are integrated with and subordinate to the principal Kennel operation. As such, the proposed amendments do not materially alter the relationship between the site and surrounding agricultural operations.

Furthermore, the proposal does not remove actively cultivated agricultural lands from production, does not create Minimum Distance Separation conflicts, and does not result in the fragmentation of agricultural lands. The proposed site-specific planning framework contains additional controls intended to ensure that the accessory uses remain subordinate to the principal Kennel use and do not evolve into an independent commercial development.

Finally, it is noteworthy that City Council has adopted Official Plan Amendment No. 166 which would bring the subject lands into the Urban Growth Boundary and re-designate the lands for Future Community Growth, subject to Provincial approval. While the current agricultural policy framework remains applicable until such time as provincial approval is obtained, Council's decision reflects a long-term planning determination that these lands are intended to accommodate future urban growth rather than remain part of the City's permanent agricultural land base. Consequently, the proposal does not create a meaningful long-term constraint on lands intended for agricultural production.

Based on the findings of the Agricultural Impact Assessment and the proposed planning controls, it is my opinion that impacts on the agricultural system have been appropriately avoided and, where necessary, minimized and mitigated in accordance with Section 4.3.5.2 of the PPS, 2024.

3.6 Sewage and Water Services

Section 3.6 of the PPS establishes policies respecting the provision of sewage and water services. The subject lands are serviced by a municipal water connection and an individual on-site sewage system, both of which were reviewed and approved through Site Plan Approval application SPA24-065. The proposed Official Plan and Zoning By-law Amendments do not alter the approved servicing strategy for the site or require the extension of new municipal infrastructure. Rather, the proposal continues to rely on servicing arrangements that have already been demonstrated to be appropriate for the intended development. Accordingly, it is my opinion that the proposal is consistent with the servicing policies of Section 3.6 of the PPS.

2.5 Rural Economic Development

Section 2.5 of the PPS recognizes the importance of supporting healthy, integrated and viable rural areas by promoting diversification of the rural economic base and providing opportunities for economic activities within Prime Agricultural Areas, where appropriate and in accordance with Section 4.3. The proposed complementary uses are intended to support and enhance an existing, lawfully permitted kennel operation by expanding the range of services available to customers while remaining subordinate to the principal use. As demonstrated throughout this report, and particularly in the analysis of Section 4.3.5, the proposed site-specific policy framework has been carefully structured to ensure that these uses remain complementary to the existing kennel operation while maintaining consistency with the broader objectives of the PPS respecting the protection of Prime Agricultural Areas.

5.2 City of London Official Plan (The London Plan):

Farmlands Place Type Policies

The subject lands are currently designated Farmlands Place Type in The London Plan. The Farmlands Place Type is intended to protect the City's agricultural land base, support agricultural and agriculture-related activities, minimize land use conflicts, and ensure that non-agricultural development does not undermine the long-term viability of agricultural operations.

The proposed Official Plan Amendment seeks to establish a site-specific policy permitting a limited range of accessory commercial and animal-related uses in association with an existing Kennel use. As such, the proposal does not conform to the currently permitted use framework of the Farmlands Place Type and requires an amendment to The London Plan.

Notwithstanding the need for a site-specific policy, it is my opinion that the proposal generally aligns with the broader intent of the Farmlands Place Type. The proposal does not result in the creation of new lots, the fragmentation of agricultural lands, or the removal of actively cultivated agricultural land from production. The principal Kennel use is already established on the property and the proposed amendments are limited to permitting complementary uses that are integrated with and subordinate to that existing operation.

Furthermore, the proposal has been structured to avoid and mitigate impacts on surrounding agricultural operations through site-specific policy and zoning controls, compliance with Minimum Distance Separation requirements, and the implementation of recommendations contained within the Agricultural Impact Assessment. A significant portion of the property is also constrained by environmental features and associated buffers, which will continue to be protected through the City's environmental policy framework.

Finally, City Council has adopted Official Plan Amendment No. 166 which would re-designate the broader area for future urban growth purposes, subject to Provincial approval. While the Farmlands Place Type remains in force at the present time, this broader planning context provides additional support for a limited and site-specific amendment that does not compromise the long-term objectives of the agricultural system.

Accordingly, while an amendment to the Farmlands Place Type is required, the proposal maintains the fundamental intent of the Place Type by protecting agricultural resources, minimizing land use conflicts, and ensuring compatibility with the surrounding rural landscape.

Specific Area Policies (Policies 1729–1734)

As discussed in the preceding sections of this report, the proposed complementary commercial uses do not strictly conform to the list of permitted uses within the Farmlands Place Type. Accordingly, this application includes a site-specific Official Plan Amendment to establish a Specific Area Policy pursuant to Policies 1729 through 1734 of The London Plan. In my opinion, the use of a Specific Area Policy is both appropriate and justified in this instance.

The London Plan recognizes that there will be circumstances where the standard place type policies do not accurately reflect City Council's planning intent for a particular property. In these situations, a Specific Area Policy provides an appropriate planning mechanism to address unique site circumstances while maintaining the overall integrity of the broader policy framework.

The subject lands represent precisely this type of circumstance. Unlike a typical proposal seeking to introduce a new commercial use into the Prime Agricultural Area, the lands already benefit from a lawfully permitted kennel use established through the City's AG1 Zone. That permission has existed since the lands were annexed into the City of London in 1993 and has recently been implemented through the approval and construction of a new purpose-built kennel facility. The current application does not seek to replace the principal use of the property or

establish an independent commercial destination. Rather, it seeks to permit a carefully defined range of complementary uses that are intended to support, enhance and remain functionally integrated with the existing kennel operation.

In this regard, the proposal satisfies the criteria for a Specific Area Policy established by Policy 1730. First, the proposal conforms with the broader objectives and applicable policies of The London Plan beyond the specific permitted use policies of the Farmlands Place Type. Second, the proposed amendment does not undermine the integrity of the Farmlands Place Type, as the principal kennel use will remain unchanged and the complementary uses are narrowly tailored through both the Official Plan and Zoning By-law to ensure they remain subordinate to the primary operation. Third, the circumstances of this site are sufficiently unique that they do not establish a planning precedent for other agricultural properties. The distinguishing characteristic of this property is the existence of a lawfully permitted kennel use, combined with a purpose-built facility that has already received planning approval and is substantially constructed. Finally, it is my opinion that the proposed policy is in the public interest and represents good planning by supporting the continued viability of an existing rural business while ensuring that the additional uses remain appropriately limited in scale and function.

Policy 1731 further provides that Specific Area Policies should not be applied where there are no distinguishing site characteristics or where they would establish a precedent for similar exceptions. In my opinion, neither concern arises in this case. The proposal is founded upon a unique historical and planning context that is unlikely to be replicated elsewhere. Furthermore, the proposed site-specific policy has been intentionally drafted to apply only to these lands and includes operational limitations that maintain the complementary relationship between the additional uses and the existing kennel. As such, approval of this amendment would not diminish the integrity of the Farmlands Place Type or create a reasonable expectation that similar permissions should be extended to other agricultural properties.

Future Community Growth Place Type and Official Plan Amendment No. 166

Although the subject lands are currently designated Farmland Place Type, City Council has adopted Official Plan Amendment No. 166, which identifies the property for inclusion within the Urban Growth Boundary as Future Community Growth, subject to Provincial approval. The purpose of the Future Community Growth Place Type is to preserve planning flexibility while comprehensive secondary planning is undertaken to determine the appropriate long-term land use pattern, transportation network, servicing strategy, parks system, environmental protection measures and community structure prior to urban development occurring. The Urban Growth Boundary Review similarly recognizes that subsequent area planning will generally be required before urban development proceeds.

Planning staff have expressed concern that the proposed amendment may be premature because the lands are anticipated to transition to the Future Community Growth Place Type and that additional planning work will ultimately be required before the long-term urban land use pattern is established.

While this is a legitimate planning consideration, it is my opinion that the proposed Official Plan and Zoning By-law Amendments do not frustrate or undermine the objectives of the Future Community Growth Place Type.

The principal factor influencing the future planning of these lands is not the proposed complementary commercial uses, but rather the existing kennel operation itself. The kennel has already received all necessary planning approvals, has been substantially constructed, represents an investment in excess of \$10 million, and occupies the overwhelming majority of the developable portion of the property. Consequently, the presence of the kennel will remain the defining consideration for any future secondary planning exercise regardless of whether the proposed complementary uses are approved.

Importantly, the current application does not authorize additional standalone commercial development or establish broader commercial land use permissions that could prejudice future planning decisions. Instead, the

proposed Official Plan and Zoning By-law amendments have been intentionally drafted so that each complementary use is expressly accessory to, and functionally dependent upon, the principal kennel operation. The additional uses cannot operate independently of the kennel and are intended solely to enhance the overall operation and patron experience associated with that use. Should the kennel cease to operate in the future, the complementary commercial permissions would likewise cease to exist. Accordingly, the proposed amendments do not create residual commercial development rights that could compromise future secondary planning or create pressure for independent commercial redevelopment.

Furthermore, no expansion of the site's physical development envelope is proposed. The application does not seek additional buildings, increased site coverage, expanded servicing requirements, new access arrangements or a pattern of development that would prejudice the future design of roads, parks, servicing infrastructure or surrounding neighbourhoods. Rather, the proposal represents an operational refinement of an already approved and legally established use.

In my opinion, the proposal therefore maintains the fundamental intent of the Future Community Growth Place Type. It does not pre-determine the ultimate urban structure of the surrounding lands, nor does it diminish the City's ability to undertake comprehensive secondary planning in the future. Instead, it recognizes the practical reality that a significant institutional-scale kennel has already been established on the property and permits a limited range of carefully regulated ancillary uses that neither materially increase planning constraints nor compromise the orderly and coordinated planning of the broader Future Community Growth area.

5.3 Zoning By-law Z.-1 (1993):

The subject lands are currently zoned Agricultural (AG1), which permits a kennel as-of-right together with a range of agricultural and rural land uses. The proposed Zoning By-law Amendment would retain the existing AG1 Zone while applying a site-specific Special Provision to permit a limited range of complementary commercial and animal-related uses in association with the existing kennel operation. The proposal does not alter the underlying intent or function of the AG1 Zone. Rather, it recognizes the evolution of an existing, legally established kennel operation through carefully controlled, site-specific permissions.

The principal use of the property will continue to be a kennel. The proposal neither changes nor expands the fundamental nature of that use. The existing operation continues to satisfy the Zoning By-law definition of a kennel as a facility established for the boarding, care and accommodation of animals, with all proposed improvements intended to enhance the overall operation and customer experience associated with that principal use.

Planning staff have correctly noted that the proposed complementary uses do not fit squarely within the conventional accessory use framework established by Section 4.1 of the Zoning By-law. However, it is important to recognize that the purpose of the current application is not to reinterpret or rely upon the City's general accessory use provisions. Rather, the application proposes a site-specific AG1 Special Provision that expressly establishes a unique planning framework tailored to the circumstances of this property. While the proposed uses may not satisfy every technical component of the City's generic accessory use provisions, the implementing zoning has been intentionally drafted to reflect the underlying planning intent of those regulations by ensuring that the additional uses remain subordinate, integrated with, and functionally dependent upon the principal kennel operation.

Unlike a conventional commercial development, the proposed animal clinic, restaurant and outdoor vendor areas cannot operate independently. The implementing zoning expressly requires that these uses operate only in conjunction with the principal kennel and prohibits their establishment on a standalone basis. Should the kennel cease to exist, the complementary uses would likewise cease to be permitted. Consequently, the proposed zoning does not establish independent commercial development rights or create an opportunity for

future standalone commercial redevelopment of the property. Instead, the additional permissions are intrinsically linked to the continued operation of the principal kennel.

The proposed site-specific regulations further reinforce the complementary nature of the development by imposing several limitations on the scale, location and operation of the additional uses. Specifically, the zoning limits the combined gross floor area of the restaurant and animal clinic uses to a maximum of 35% of the principal kennel building, restricts outdoor vendor areas to a maximum area of 500 m², requires all buildings to be clustered within 60 metres of the principal building, and prohibits separate vehicular access points from Bradley Avenue. These provisions ensure that the complementary uses remain clearly subordinate to the principal kennel operation and prevent the gradual evolution of the site into an independent commercial destination.

The proposal does not seek relief from the remaining performance standards applicable to the AG1 Zone. Existing and proposed development will continue to comply with the applicable zoning regulations respecting setbacks, building height, lot coverage, parking, landscaping, minimum distance separation requirements and all other applicable provisions of the Zoning By-law. The proposed Special Provision therefore represents a targeted modification to the list of permitted uses while maintaining the overall development framework established by the AG1 Zone.

In my opinion, the proposed AG1 Special Provision Zone represents an appropriate and measured planning response to the unique circumstances of this site. The zoning recognizes the evolution of an existing, legally established kennel operation while incorporating comprehensive safeguards that ensure the complementary uses remain subordinate in scale, integrated in function and inseparable from the continued operation of the principal kennel. As such, the proposed zoning amendment maintains the overall intent of the Agricultural Zone while providing a clear and enforceable regulatory framework that prevents unintended commercial expansion in the future.

6.0 CONCLUSIONS

The proposed Official Plan and Zoning By-law Amendments present a unique planning circumstance that is not directly contemplated by the existing planning policy framework. Unlike a typical application involving the introduction of a new non-agricultural use within a Prime Agricultural Area, the subject lands already contain a recently approved and substantially completed kennel facility that is lawfully permitted by the existing AG1 Zone. Accordingly, the fundamental planning question is not whether a new non-agricultural use should be introduced into the agricultural area, but rather whether a limited range of complementary commercial and animal-related uses can appropriately be permitted in association with an existing and legally established principal use.

The proposed Official Plan and Zoning By-law Amendments have been intentionally structured to recognize this unique circumstance while ensuring that the proposal remains appropriately limited in scale, function and long-term planning implications. In particular:

- ▶ **The principal Kennel use is already permitted by the existing AG1 Zone and has recently been established through the Site Plan Approval process.** The proposed amendments do not introduce a new principal land use or establish a standalone commercial development within the Prime Agricultural Area.
- ▶ **The proposal satisfies the intent and requirements of Section 4.3.5 of the Provincial Planning Statement, 2024.** The proposed complementary uses are limited in scale, remain physically clustered within the existing development envelope, and are expressly required through the implementing zoning to operate only in association with the principal kennel use.
- ▶ **The proposal does not result in additional impacts to the agricultural land base.** The subject lands already constitute an existing non-agricultural lot of record occupied by a purpose-built kennel facility. No additional agricultural lands are removed from production, the lands do not comprise a Specialty Crop Area, and the proposal complies with the applicable Minimum Distance Separation requirements.
- ▶ **No reasonable alternative location exists for the proposed complementary uses.** Their function, viability and purpose are intrinsically tied to the operation of the principal kennel and they cannot reasonably be separated from that use.
- ▶ **The proposal does not undermine the intent of Official Plan Amendment No. 166 or future comprehensive planning efforts.** The existing kennel facility already represents the defining long-term land use on the property. The zoning framework ensures that the complementary uses remain subordinate to the principal kennel and cannot evolve into independent commercial development that would prejudice future secondary planning or coordinated community design.
- ▶ **The proposed Official Plan Amendment appropriately utilizes the Specific Area Policy provisions of The London Plan** to recognize the unique circumstances of the site while maintaining the overall intent of the broader planning policy framework.

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- **The proposal supports the broader objectives of the Provincial Planning Statement by promoting economic development within a rural area** while utilizing existing municipal water servicing and an approved on-site sewage system established through the recently approved Site Plan process.

Ultimately, this application is not about creating a new commercial destination in the agricultural area. It is about recognizing the incremental evolution of an existing, lawfully established kennel operation through a carefully crafted policy and zoning framework that contains, regulates and limits the scale of the complementary uses while ensuring they remain inseparable from the principal use.

Country Paws Boarding has made a significant long-term investment in creating what will become one of Southwestern Ontario's premier pet care facilities. The proposed "DogPlex" concept represents an innovative economic development opportunity and a unique regional destination that is not directly contemplated by the City's current planning policy framework, yet can be accommodated without undermining the agricultural system, prejudicing future growth planning, or creating unintended commercial development rights.

For these reasons, it is my professional opinion that the proposed Official Plan and Zoning By-law Amendments represent sound land use planning, are consistent with the Provincial Planning Statement, conform to the overall intent of The London Plan, and are in the public interest. Accordingly, the applications should be approved.

Michael Davis, MCIP, RPP

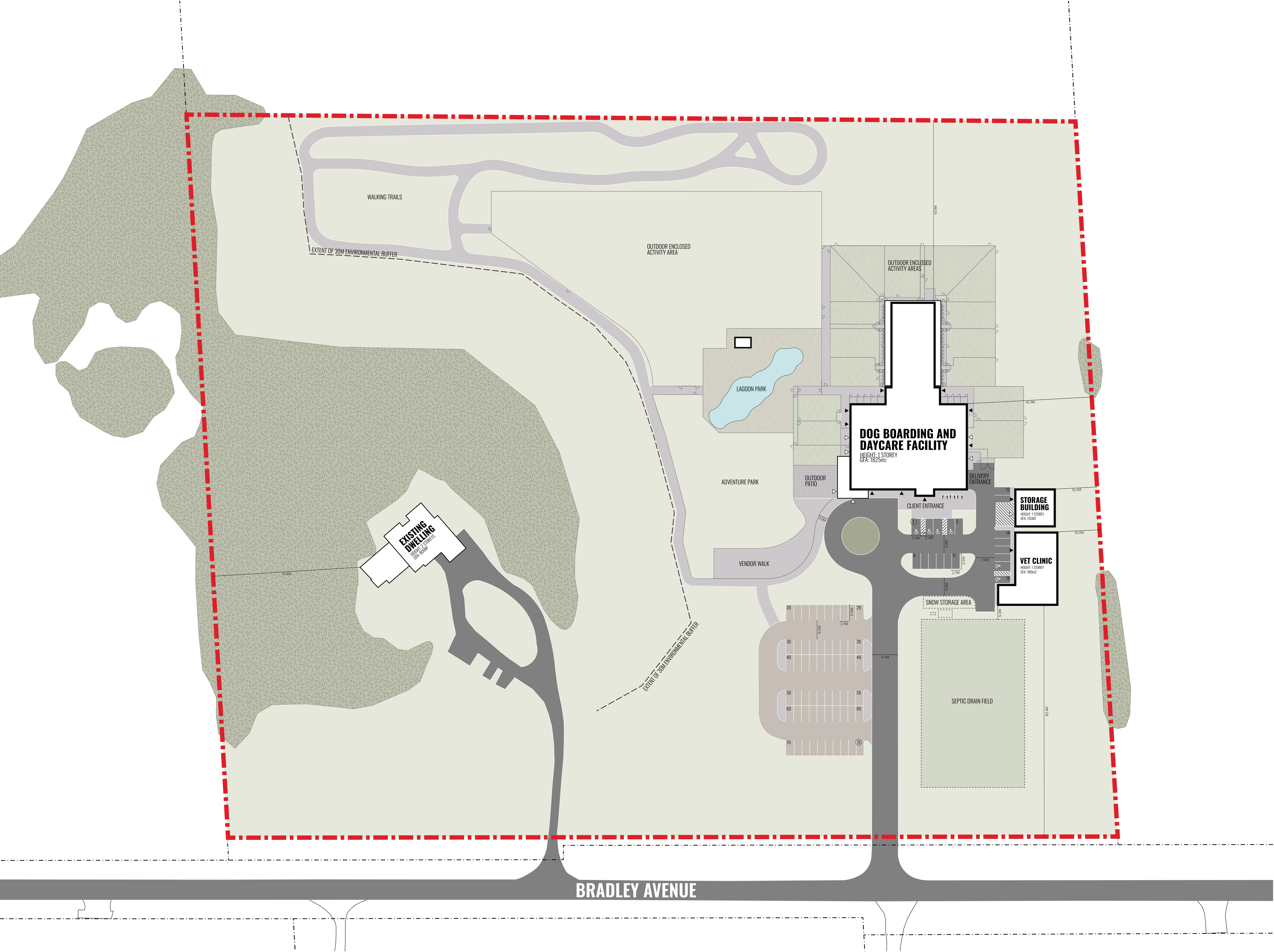


APPENDICES

Site Plan	A
Draft OPA/ZBA	B



APPENDIX A: SITE PLAN



CONCEPT PLAN

PROJECT SITE
2206 Bradley Avenue, London ON



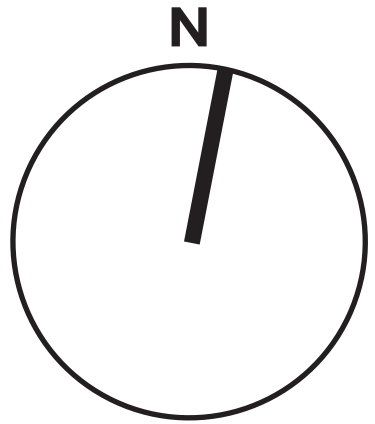
SITE DATA



Regulations	Required	Proposed
Permitted Uses:	See subsection 45.2	Kennels & Accessory Uses
Lot Area:	40 hectares (min)	777 hectares
Lot Frontage:	200m (min)	310.0m
Front Yard Depth:	15m (min)	90.9m
Rear Yard Depth:	15m (min)	63.1m
Interior Side Yard Depth:	15m (min)	East: 15.0m West: 51.8m
Residential Height:	12m (max)	7.0m
All Other Buildings Height:	15m (max)	7.0m
Lot Coverage:	20% (max)	3.6%

* Requires Special Provision

Client: Country Paws
Date: 07.02.2026
Drawn By: C. Taylor
Plan Scale: nts
File No: 2206B
Version: 1.0



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Lot Boundary Disclaimer: Site dimensions have been assumed based on data provided by the City of London. Siv-ik planning and design inc. makes no warranties or guarantees regarding the accuracy of the lot boundaries.



APPENDIX B: DRAFT OFFICIAL PLAN & ZONING BY-LAW AMENDMENT

Official Plan Amendment

Bill No. (number to be inserted
by Clerk's Office) 2026

By-law No. C.P.-XXXX-

A by-law to amend the Official
Plan, The London Plan for the
City of London, 2016 relating to
2206 Bradley Avenue.

The Municipal Council of The Corporation of the City of London enacts as follows:

1. Amendment No. (to be inserted by Clerk's Office) to the Official Plan, The London Plan for the City of London Planning Area – 2016, as contained in the text attached hereto and forming part of this by-law, is adopted.
2. This Amendment shall come into effect in accordance with subsection 17(27) or 17(27.1) of the Planning Act, R.S.O. 1990, c.P.13.

PASSED in Open Council on September 22, 2026, subject to the provisions of PART VI.1 of the Municipal Act, 2001.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – September 22, 2026
Second Reading – September 22, 2026
Third Reading – September 22, 2026

AMENDMENT NO.
to the
OFFICIAL PLAN (THE LONDON PLAN) FOR THE CITY OF LONDON

A. PURPOSE OF THIS AMENDMENT

The purpose of this Amendment is to add a policy to the Specific Policies for the Farmlands Place Type and add the subject lands to Map 7 – Specific Policy Areas – of the City of London Official Plan to permit a limited range of commercial and animal-related uses that are complementary to and operated in association with a principal Kennel use.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to lands located at 2206 Bradley Avenue in the City of London, as shown in Schedule 1 below.

C. BASIS OF THE AMENDMENT

The proposed amendment seeks to permit a limited range of commercial and animal-related uses that are complementary to and operated in association with a principal Kennel use. The Kennel use is permitted within the implementing AG1 Zone for the Farmlands Place Type. The subject property is an existing lot of record that contains a large-scale kennel operation supporting animal care, boarding and grooming services.

The subject lands do not comprise a specialty crop area, and the proposed development complies with the provincial Minimum Distance Separation (MDS) Formulae. The proposed additional uses derive their purpose and function from the existing Kennel operation. The proposed animal clinic, pet-related retail uses, restaurant/café and other complementary uses are primarily intended to serve kennel patrons, visitors and pet owners utilizing the facility and are specifically intended to operate as part of a unified animal care and recreation destination. The proposed Official Plan and Zoning By-law Amendments have been structured to ensure these uses remain subordinate to and operate in conjunction with the principal Kennel use.

Given that the principal use is already established and permitted on the subject lands, there are no reasonable alternative locations that would achieve the intended planning objective. Relocating the complementary uses to another property would sever their functional relationship with the Kennel operation and undermine the integrated nature of the proposal.

Further, the existing kennel use, including the existing structures and associated outdoor play areas eliminate the site's suitability for conventional agricultural production, and no actively cultivated agricultural lands will be removed from production as a result of the proposed complementary land uses.

The proposed uses are generally compatible with the surrounding area and do not further exacerbate any issues with respect to compatibility or agricultural impact. Site conditions also demonstrate the capacity to accommodate the necessary on-site servicing required to support the uses.

Finally, site-specific policies and implementing zoning provisions have been incorporated to ensure orderly development, appropriately contain the use, and prevent adverse impacts on neighbouring properties or the broader agricultural area.

Overall, the proposal is consistent with the Provincial Policy Statement, 2024, and specifically satisfies the criteria for the establishment of non-agricultural uses in prime agricultural areas set out in Section 4.3.5 of the PPS.

Upon provincial approval of OPA166, the lands will be brought into the City of London Urban Growth Boundary. Thus, any agricultural impacts would be largely redundant as the lands are not planned/reserved for long-term agricultural use. Furthermore, given the scale of the principal kennel use and the additional controls within the site-specific Official Plan and Zoning By-law Amendment, the implementation of additional small-scale commercial and pet-related uses, in association with the Kennel use, will not have an impact on the future comprehensive planning and development of these lands and will not create a further/additional barrier to the future comprehensive planning and development of the lands.

D. THE AMENDMENT

The London Plan for the City of London is hereby amended as follows:

1. Specific Policies for the Farmland Place Type of Official Plan, The London Plan, for the City of London is amended by adding the following:

() 2206 Bradley Avenue

For the lands municipally known as 2206 Bradley Avenue, in addition to the uses permitted in the Farmland Place Type, a limited range of accessory commercial and animal-related uses that are complementary to and operated in association with a principal Kennel use may be permitted, including uses such as an animal clinic, pet-related retail, restaurant, and other similar complementary uses.

Such uses shall be developed and operated in an integrated manner with the principal Kennel use and shall remain subordinate and complementary in scale and function to the primary use of the property.

The Zoning By-law shall include appropriate regulations to ensure that:

- additional permitted uses remain accessory, complementary, and subordinate to the principal Kennel use;
- the scale and intensity of additional permitted uses are limited in relation to the principal Kennel operation; and,
- additional permitted uses are developed and operated in an integrated manner as part of a unified animal boarding and care establishment.

2. Map 7 - Specific Policy Areas, to the Official Plan, The London Plan, for the City of London Planning Area is amended by adding a Specific Policy Area for the lands located at 2206 Bradley Avenue in the City of London, as indicated on "Schedule 1" attached hereto.

Schedule 1:



Zoning By-law Amendment

Bill No.(number to be inserted by
Clerk's Office) 2026

By-law No. Z.-1-_____

A by-law to amend By-law No. Z.-1 to
rezone an area of land located at 2206
Bradley Avenue

WHEREAS Country Paws Boarding Inc. has applied to rezone lands located at 2206
Bradley Avenue as shown on the map attached to this by-law, as set out below;

AND WHEREAS upon approval of Official Plan Amendment Number (number to be
inserted by Clerk's Office) this rezoning will conform to the Official Plan;

THEREFORE the Municipal Council of The Corporation of the City of London enacts as
follows:

1. Schedule "A" to By-law No. Z.-1 is amended by changing the zoning
applicable to the lands located at 2206 Bradley Avenue, as shown on the
attached map comprising part of Key Map No. A113, **FROM** an Agricultural
(AG1) Zone **TO** an Agricultural Special Provision (AG1(_)) Zone.
2. Section Number 45.4 a) of the AG1 Zone is amended by adding the following
Special Provisions:

AG1(_) 2206 Bradley Avenue

Additional Permitted Uses:

- i) The following uses shall be permitted in conjunction with a kennel use
and shall not operate on a standalone basis:
 - a. Animal Clinic
 - b. Restaurant
 - c. Retail Store

Regulations:

- ii) The combined gross floor area of the restaurant and animal clinic shall not exceed 35% of the principal kennel facility/building.
- iii) Outdoor vendor areas associated with the principal kennel use shall be permitted for the sale of food, beverages and pet-related merchandise.
- iv) The maximum size of the outdoor vendor area shall be 500m².
- v) All primary buildings associated with the additional permitted uses shall be clustered/grouped such that they are located within 60m of the main kennel building and shall not include separate vehicular access points from Bradley Avenue.
- vi) Notwithstanding Section 4.1 of Zoning By-law Z.-1, accessory buildings shall be permitted within the front yard.
- vii) Notwithstanding Table 45.3, the minimum lot area shall be 7.7 hectares.

The inclusion in this By-law of imperial measure along with metric measure is for the purpose of convenience only and the metric measure governs in case of any discrepancy between the two measures.

This By-law shall come into force and be deemed to come into force in accordance with Section 34 of the Planning Act, R.S.O. 1990, c. P13, either upon the date of the passage of this by-law or as otherwise provided by the said section.

PASSED in Open Council on September 22, 2026

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – September 22, 2026
Second Reading – September 22, 2026
Third Reading – September 22, 2026

AMENDMENT TO SCHEDULE "A" (BY-LAW NO. Z.-1)

