



FINAL PROPOSAL REPORT

PREPARED FOR:

**Draft Plan of Subdivision
Zoning By-Law Amendment
Kreative Development Inc.**
2004 Hamilton Road

File no. 13198B

**June 2025 –
Revised April 2026**



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1.0 Introduction

1.1 Overview

MacNaughton, Hermesen, Britton, Clarkson Planning Limited ("MHBC") has been retained by Kreative Development Inc. (the "property owner") to assist with the preparation of a Draft Plan of Subdivision (the "Draft Plan") application and Official Plan Amendment and Zoning By-law Amendment applications for the property municipally addressed as 2004 Hamilton Road (the "subject lands") in the City of London.

The subject lands are located at the northwest corner of the intersection of Veterans Memorial Parkway and Hamilton Road in eastern London and comprise 45.55 hectares in area, of which 7.61 hectares are proposed to be developed through the proposed Draft Plan, Official Plan Amendment, and Zoning By-law Amendment applications (collectively, the "Applications"). The remainder of the subject lands contain natural heritage features and are not proposed for development. The Feteke Drain, extends from the north and crosses under Hamilton Road. This Drain has been abandoned under the Drainage Act and has natural heritage, steep slope, and flood elevation impacts on the subject lands.

The subject lands are designated Light Industrial and Green Space and are located along a Civic Boulevard in The London Plan. The lands are located within the Airport Road South Innovation Park Special Policy Area and are zoned Urban Reserve (UR6), Open Space (OS4), and Environmental Review (ER).

The proposed Applications facilitate the development of a light industrial subdivision which will provide multiple Blocks for future light industrial uses permitted within the light industrial (LI1/LI4/LI5) zones.

The Draft Plan includes five Blocks oriented towards Veterans Memorial Parkway, Hamilton Road and a new internal public road (Street A). As access to the subject lands is restricted from Veterans Memorial Parkway and is not permitted within 300 metres of the Veterans Memorial Parkway right-of-way, access to the proposed subdivision is proposed via an interim street (Street B). Street B is intended to be temporary in nature and would be removed once the lands to the west are developed and Street A can be extended into those lands, providing an alternative permanent access out to Hamilton Road opposite Venture Gate. An easement is proposed over Street B for access and would be lifted in the ultimate condition. Street B, along with a permanent easement for municipal servicing, are proposed within Block 3.

The proposed Street A crosses the Feteke Drain. The project team has coordinated review of this crossing and the Draft Plan incorporates development limits that have been established in supporting technical studies to delineate the existing natural heritage features, natural hazards, updated floodlines, crossing requirements, and appropriate buffers and compensation blocks to protect the features and hazards.

This Final Proposal Report supports the required Applications and assesses the proposal in the context of the applicable planning framework. In support of the application, this Report includes:

- An introduction and general description of the subject lands, surrounding uses and existing conditions, to provide an understanding of the locational context;
- An overview of the proposed development;
- A description of the overall land use planning and design elements of the proposed development;
- A description of the proposed Applications;
- A review of existing policy framework in relation to the proposed development and assessment of consistency with the Provincial Planning Statement and conformity with The London Plan;
- An overview of the supporting reports and implications on the Draft Plan; and,
- A review and summary of technical reports and assessments prepared in support of the Applications.

1.2 Formal Consultation and Submission Requirements

An Initial Proposal Report was submitted to City staff on March 17, 2023 outlining the proposed development. A Proposal Review Meeting was held on May 10, 2023 and a Proposal Review Meeting Summary and Record of Consultation was subsequently issued on June 23, 2023. The Record of Consultation was reviewed and updated by City staff on September 10, 2024.

City staff identified the following submission requirements for a complete Draft Plan of Subdivision and Zoning By-law Amendment application:

- Final Proposal Report
- Transportation Impact Assessment
- Subject Lands Status Report
- Conceptual Stormwater Servicing Report
- Geomorphic Study
- Hydrogeological Study
- Geotechnical Investigation
- Feature-based Water Balance Assessment
- Water Servicing Report
- EA Opinion Letter

The aforementioned requirements were previously submitted and accepted by the City on August 6, 2025. City staff provided comments on September 22, 2025 and a subsequent memorandum dated October 20, 2025, wherein staff indicated that an Official Plan Amendment is required to align the proposal with Maps 1, 3, 4, and 5 of The London Plan. The applications and this Report have been

revised to include the Official Plan Amendment, address comments raised by staff and to remove permissions for standalone commercial uses. As part of the revisions, the Hydrogeological Study, Geotechnical Investigation, and Draft Plan of Subdivision were revised. Paradigm Transportation Solutions prepared a Sight Distance Memorandum to provide additional information requested by staff. This Report includes updated engineering responses, and a comment response matrix has been prepared to address additional staff comments.

The findings of these technical reports are summarized in this Report. A Water Servicing Report has not been completed at this stage, however, a description of the proposed water servicing strategy is provided in this Report. Detailed water modeling and a functional water servicing report will follow the Applications as part of a Focused Design Study submission.

2.0 Site Description and Existing Conditions

2.1 Site Description and Surrounding Uses

The subject property is bound by Hamilton Road to the south, Veterans Memorial Parkway to the east, agricultural lands to the west, and the Thames River to the North. The site is legally described as Concession 1, Part Lot 5, Concession BF, Part Lot 5. The site is rectangular in shape, comprises approximately 45 hectares and has a frontage of approximately 393 metres along Hamilton Road and 1.12 kilometres along Veterans Memorial Parkway. Approximately 80% of the subject lands are not proposed for development due to existing natural heritage features, natural hazards, and the Fekete Drain (abandoned under the Drainage Act). The property also contains the downstream most section of the smaller Hudson Drain (also a former Municipal Drain) which conflues the former Fekete Drain near the west limit of the site.

The lands previously contained a residential dwelling (now removed), surrounded by mix of wooded area and grassed open space.

The site is located near the easterly edge of the City and is surrounded by agricultural and industrial uses. The site forms part of a developing employment area, with a variety of uses established or planned in the vicinity of the subject property (see **Figure 1**). The following provides a review of surrounding land uses:

North: The Thames River, beyond which are residential and light industrial uses.

South: Hamilton Road, beyond which is an industrial subdivision, interim rural residential, and isolated institutional uses (Bostwick Pioneer Cemetery).

East: Interim agricultural (horse stable and topsoil supplier), institutional (London First Korean Presbyterian Church), and residential uses.

West: Veterans Memorial Parkway, beyond which are agricultural and rural residential use.



Figure 1: General Location Plan

 Subject Lands



2.2 Subject Lands Status Report

A Subject Lands Status Report ("SLSR") has been prepared by Natural Resource Solutions Inc. (NRSI). The SLSR includes background species information for the subject lands, the results of original field surveys and identifies the sensitive and significant features of the study area. The SLSR was prepared in accordance with the updated City of London Environmental Management Guidelines and is consistent with The London Plan. An environmental scoping meeting was held on June 7, 2022 with staff from the City of London, Upper Thames River Conservation Authority, LDS Consultants (now closed, with the supervising engineer who oversaw the original work now with Stonecairn Consulting), Development Engineering, and NRSI.

A total of 12 site visits were conducted in 2021 and 2022, including site visits with agency staff on May 20 and June 21, 2022 to verify woodland and wetland boundaries.

The SLSR summarizes the natural features on the subject lands as follows (**Figure 2**):

- "Significant Woodland associated with Meadowlily ESA including CUP;
 - 7 Regionally Significant Plants observed;
 - CUP features included within Significant Woodland designation, although they provide less diversity and significance than interior forested areas;
- Significant Valleyland associated with Fekete Drain;
 - Linkage Corridor associated with Fekete Drain;
- Wetland (non-provincially significant);
- Fish Habitat associated with Fekete Drain and Unnamed Tributary to Fekete Drain;
- Habitat for Endangered or Threatened Species;
 - Potential for Bat SAR within forested area;
- Significant Wildlife Habitat;
 - Confirmed Terrestrial Crayfish SWH within subject lands;
 - Candidate Raptor Wintering Area within subject lands;
 - Candidate Bat Maternity Roosts within subject lands (small area of FOD3-1);
 - Additional Candidate and Confirmed SWH for SCC within the study area;
- Meadowlily Woods Environmentally Significant Area within study area; and,
- Significant Groundwater Recharge Areas and Highly Vulnerable Aquifers"

2.3 Archaeological/Built Heritage Concerns

As noted in the Proposal Review Meeting Summary and Record of Consultation, City of London staff stated that there are no cultural heritage or archaeological concerns related to the property or the associated proposal. As such an archaeological assessment was not required.

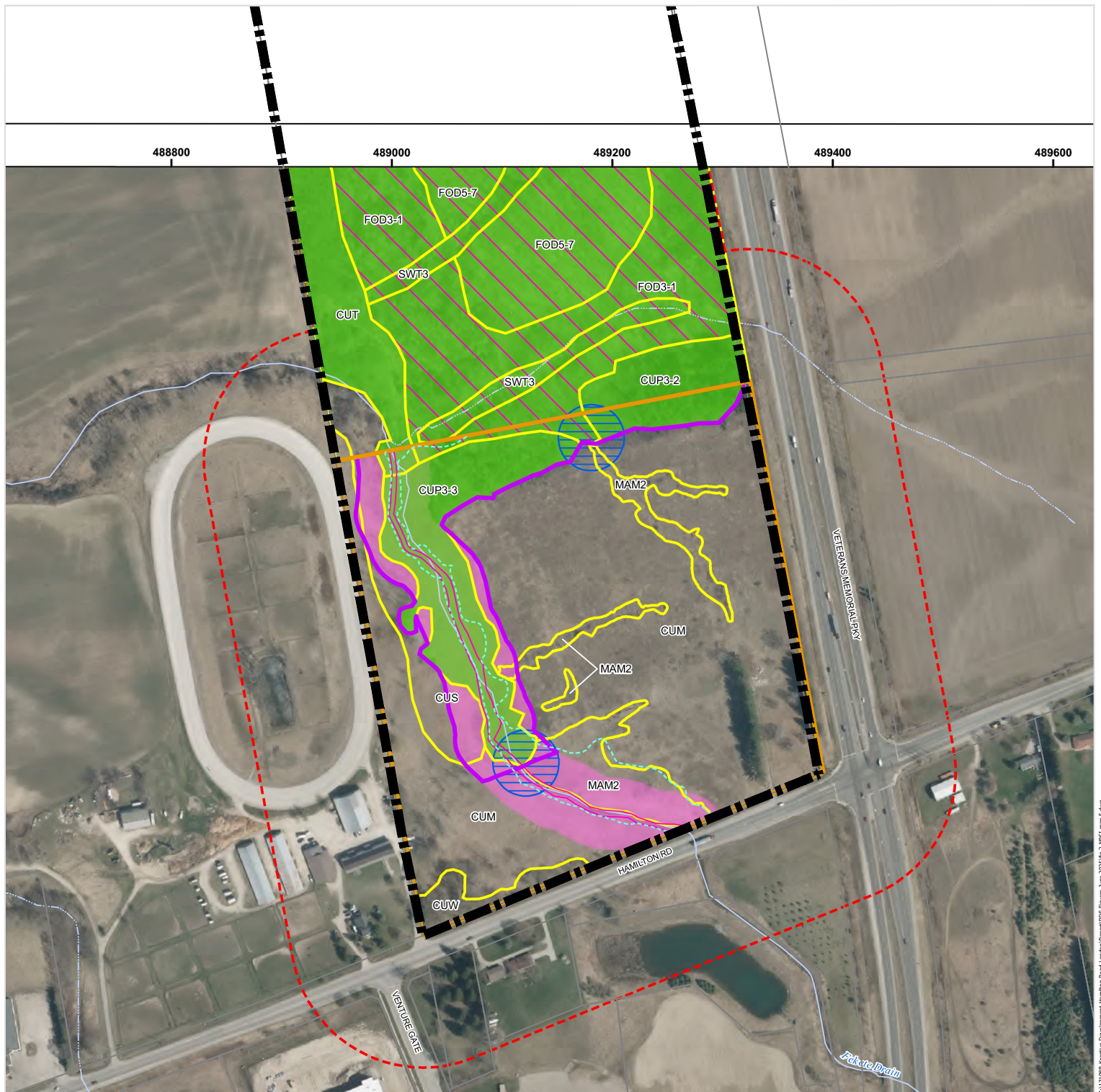
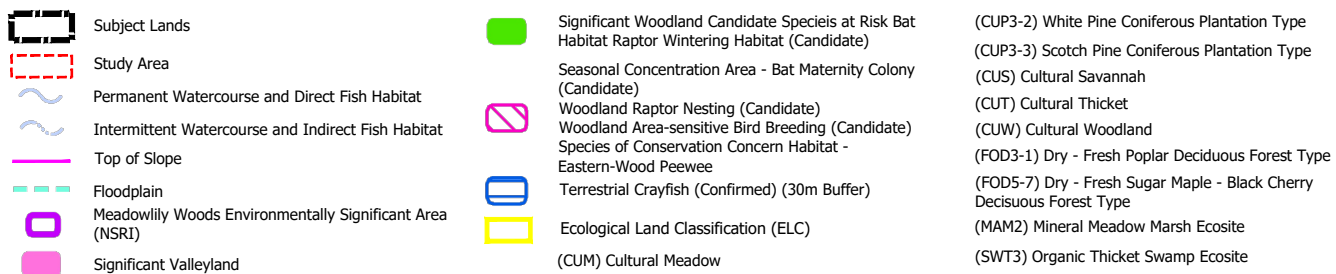


Figure 2: NRSI Map 5 - Significant Natural Features



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3.0 Subdivision Design

3.1 Development Concept

3.1.1 Primary Components

The Draft Plan (**Figure 3**) included with this Report has been designed to accommodate light industrial uses with a road and Block pattern that efficiently uses the lands outside of the natural features, with proposed and future road connections to Hamilton Road and the adjacent lands to the west. The Draft Plan has been updated in consideration of comments from municipal and agency staff provided from the Initial Proposal Report and the first submission comments, and reflects conclusions of the technical studies prepared in support of the Applications.

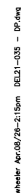
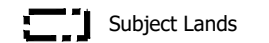
The proposed Draft Plan supports a range of light industrial uses within varying Block sizes, allowing for a variety of light industrial uses/buildings. The layout also considers the City's plan for providing vehicular access to the site from the west as the ultimate access is proposed through a new collector road which extends Venture Gate to the north on the adjacent site. The interim solution for access to the site is proposed through Street B, which connects to Hamilton Road and provides vehicular access to all of the proposed blocks. In the ultimate condition, Street A will connect to the extension of Venture Gate and Street B will be removed. A permanent servicing easement is proposed proximate to Street B to avoid relocation of municipal services when the ultimate road network is established. Both Street B and the utility easement are part of Block 3, and will be comprehensively redeveloped in the ultimate condition.

Street A is proposed to cross the Feteke Drain via a box culvert. The culvert will include a local sanitary sewer and watermain, as well as a local storm drainage outlet. Minor improvements to the Drain are proposed to remove an accumulation of sediment immediately downstream of Hamilton Road.

The Draft Plan incorporates development limits that have been established based on a combination of studies to delineate the existing natural heritage features, natural hazards, updated floodlines, crossing requirements, and appropriate mitigation measures to protect the features and hazards.

The Draft Plan incorporates these principal elements:

- All development Blocks are proposed to be zoned light industrial (LI1/LI4/LI5). This includes:
 - Block 1, located north of Street A and 0.65 hectares in size,
 - Block 2, located south of Street A and west of Street B at 0.67 hectares in size,
 - Block 3, located south of Street A and 0.22 hectares in size;
 - Block 4, located in the northwest corner of Veteran's Memorial Parkway and Hamilton Road, being 1.71 hectares in size; and



- Block 5, being 3.68-hectares in size and located at the cul-de-sac of the proposed Street A;
- 33.62 hectares of open space (Blocks 14 and 15) which will protect the various onsite features such as the Fekete Drain and the woodlot on the property. These lands are intended to be environmentally protected through the appropriate zoning designation (OS5);
- Two 1.4-hectare natural heritage blocks (Blocks 12 and 13), providing a 30-metre-wide buffer around natural heritage features;
- 1.53 hectares of compensation lands (Blocks 6-11), being lands to be converted into natural heritage areas to provide compensation at a 1:1 ratio for existing natural heritage features that are proposed to be removed to accommodate the development;
- 0.68 hectares for Street A, which provides access to the individual development blocks and crosses the Feteke Drain, avoiding multiple access points along Hamilton Road; and,
- A 1.381-hectare road widening (Block 13) along Veteran's Memorial Parkway and Hamilton Road.

Additionally, a 5-metre-wide conceptual trail is provided within the natural heritage buffer, as shown on Figure 7C to the Environmental Impact Study.

3.2 Design Considerations

The Draft Plan has been designed with the following core elements:

- Five light industrial blocks are proposed, conforming to the City's vision for these lands to be used for Light Industrial uses. A variety of block sizes are provided which can accommodate a variety of uses;
- Protection of natural heritage features, including the Fekete Drain and the identified woodlot on the site, has been a key factor in the design of the subdivision. The proposed draft plan incorporates development setbacks, Natural Heritage System buffers, and delineates key open space/compensation areas along the channel and other site features as identified by NRSI;
- The Block sizes have been created to be consistent with those in the Venture Gate subdivision to the south; and,
- The subdivision has been designed to limit vehicular access to Hamilton Road and to prohibit access to Veterans Memorial Parkway in order to facilitate the efficient flow of traffic.

Additionally, the proposed Draft Plan has regard for several City of London policies and guidelines relating to industrial subdivision design. The design has considered the Airport Road South Innovation Park Policies and respective Urban Design Guidelines and incorporates the findings of the supporting technical studies. In this respect, several 'best practices' have been incorporated into the subdivision layout including the following:

- Create an inclusive, diverse and unique subdivision that integrates a mix of industrial uses and has a high level of connectivity;
- Provide a mixture of employment opportunities to meet the needs of the City;

- Utilize efficient development patterns to minimize land consumption and servicing/maintenance costs;
- Propose building densities and land uses along higher order streets that support transit services;
- Design integrated street and development patterns to support pedestrian-oriented development patterns, transit and cycling with strong relationships to natural heritage features (recognizing that a significant natural corridor traverses the site and Significant Woodlands are located on the northern portion of the property);
- Provide opportunities for visual connections and ease of public access to adjacent streets, parks and other public areas;
- Design vehicular traffic movements to minimize the use of local streets as by-pass routes between the arterial and collector road systems;
- Incorporate efficient servicing design by accommodating the majority of primary servicing (storm and sanitary sewers, watermains, private utilities) within rights-of-ways and by minimizing underground services within easements; and
- Integrate on-site stormwater management controls into the subdivision design, including a combination of LIDs on private lands and open space lands.

3.3 Civil Engineering

This Section was prepared by Development Engineering (London) Limited.

3.3.1 Existing Services

Sanitary Drainage

As of the date of this Report the subject site is not serviced for sanitary by Municipal sanitary sewer infrastructure. The nearest existing Municipal sanitary sewer is 675mm diameter located 450m to the west of the subject site near the corner of Hamilton Road and Commissioners Road East. Based on current City of London Mapping, this 675mm diameter sanitary sewer conveys drainage from the Innovation Industrial Park to the south and combines with flows from residential properties adjacent to Hamilton Road northwest across the South Branch of the Thames River and west towards the East Park Sanitary Pumping Station (SPS). The SPS pumps effluent north and west along Hamilton Road and ultimately to the Pottersburg Pollution Control Plant (PCP). There was originally a single detached residential dwelling on the site serviced for sanitary by a private wastewater treatment (septic) system but it is assumed that system was decommissioned/removed as part of demolition of the building in 2019-2020.

It is our understanding based on a review of existing City record drawing #19919 (**Appendix A**) and confirmed by the City of London's IPR comments, the subject site is tributary to the trunk 675mm diameter sanitary sewer on Hamilton Road. While the site is identified on the record drawing as an area requiring a pumping station, it is anticipated based on preliminary design that this only applies to the northern environmentally sensitive portion of the site. The southern portion of the site proposed to be developed is anticipated to be serviceable by gravity given the depth of the existing outlet.

Water Supply

Existing Municipal potable water infrastructure in the vicinity of the subject site consists of a 600mm diameter Municipal watermain located on the south (far) side of Hamilton Road and a 600mm diameter Municipal watermain located on the east (far) side of Veterans Memorial Parkway. It is our understanding (confirmed by the City's IPR comments) both watermains are part of the City's Low-Level pressure zone (HGL=301.80m). There was originally a single family residential dwelling on the site serviced for water by a private potable water well but it is assumed that system was decommissioned/removed as part of demolition of the building in 2019-2020.

Storm Drainage

There is no existing Municipal storm sewer fronting the subject property on either Hamilton Road or Veterans Memorial Parkway. There is an existing open drainage channel roughly bisecting the site (formerly the Fekete Drain) which transports drainage flows from lands south of Hamilton Road including the Innovation Business Park and its associated Stormwater Management Facilities north and west towards the south branch of the Thames River.

Transportation (Arterial Road Connectivity)

As discussed, the Site integrates frontage on Hamilton Road as the primary access to the site. Although the site is adjacent to Veterans Memorial Parkway, no access is proposed to the site from the Parkway, in compliance with City requirements.

The section of Hamilton Road traversing the Site is designated as a Civic Boulevard pursuant to Map 3 of The London Plan. Veterans Memorial Parkway is designated as an Expressway. Policy 371 of The London Plan identifies that Civic Boulevards are to prioritize pedestrian, cycle and transit movements and to accommodate medium to high volumes of vehicular traffic whereas Expressways are to prioritize for vehicles and freight movement and move high volumes of vehicular traffic. The subdivision design has multiple Blocks fronting on Hamilton Road, which will assist in addressing the street and provide pedestrian and cycling connections into the development.

Subdivision Phasing and Staging

The proposed Draft Plan is intended to be registered in a single Phase, creating 5 development Blocks. The remaining lands are intended to remain for open space purposes and details are provided through the EIS.

3.3.2 Proposed Sanitary Servicing

Proposed Sanitary Sewershed

The Existing and proposed municipal sanitary sewershed in the vicinity of the subject site is identified in **Appendix A**.

The proposed Subdivision has a total area of approximately 45.6 ha, of which 36.6 ha has been identified as open space blocks due to existing environmental and hydrogeological features restricting development, as well as areas proposed for ecological compensation. This leaves approximately 9.0 ha of developable area, which will contribute to sanitary infrastructure. According to City Record Drawing #19919, the subject site is part of a larger area proposed to be serviced for sanitary via pump stations.

However, a pump station would only be necessary on the subject site specifically to service the northern environmentally sensitive areas which are not proposed for development. The proposed ICI blocks are anticipated to be serviceable by gravity.

The Developer is anticipating densities in line with the City of London's Design Specifications and Requirements Manual (DSRM, last updated January, 2025). The total population for the development have been estimated and are summarized below in Table 1. It is notable the proposed ICI area includes assumed future expansion of Block 2 to include Block 3 following establishment of the ultimate subdivision entrance across from Venture Gate as a worst-case scenario. Refer to the design sheet provided in **Appendix A**.

Table 1: Summary of Assumed Design Population / Sanitary Flows

Type of Development	Development Area (ha)	Estimated Population	Q _{people} (L/s)	Q _{infiltration} (L/s)	Q _{total} (L/s)
ICI	6.93	693	1.84	0.69	
Open Space/Roadways	2.06	0	0	0.21	
Total:	8.99	693	1.84	0.90	8.81¹

Note 1 – Q_{total} includes Harmon Peaking Factor and Uncertain Development Factor of 1.1 per DSRM

Sanitary Servicing Strategy

It is currently anticipated the sanitary drainage from the proposed development will be collected via a gravity Municipal sanitary sewer on Street 'A' underneath the Fekete drain (anticipated 4-9m depth) to the existing 675mm municipal gravity sanitary sewer located 450m to the west of the subject site near the corner of Hamilton Road and Commissioners Road East (as described in Section 7.1.1). This includes an approximately 490m external sewer extension along Hamilton Road from the site to the existing outlet.

Based on preliminary design it is anticipated that this development will consist of a combination of cut and fill conditions (ref Section 10.2). It is anticipated that the final construction grades will generally fall from south to northwest across the site, mimicking the existing site topography. Due to the existing profile of Hamilton Road, portions of the external road extension are anticipated to be very deep (6-8m depth), while the on-site sewers will be closer to standard depths. The subdivision is currently being presented as a single phase development.

The developer's Civil Engineering consultant has been in contact with the City of London's Sewer Engineering division regarding the extension of a gravity sewer from the existing 675mm diameter outlet to service the subject site. It is anticipated the sewer will need to be 375-450mm diameter to convey drainage from both the subject site and surrounding external lands per City Record Drawings #19919, #19920 and #22307. A portion of the proposed sewer (to a point approximately 300m east of the centerline of Old Hamilton Road) was originally anticipated to be installed by the City of London as part of an upcoming reconstruction of the intersection of Old Hamilton Road and Commissioners Road East to include a roundabout. However, following a meeting with the City's road recon team on March 10, 2025, it was determined there was minimal overlap between the two projects and as such the sewer extension is anticipated to be entirely developer constructed. As portions of the sewer are anticipated

to be greater than 250mm in diameter and service external areas within the Urban Growth Boundary of the City, it is anticipated the sewer will be eligible for an oversizing subsidy per Chapter 3.2 of the City's Development Charge by-law. However, the developer also intends to present the project as a CSRF funded Regional Trunk sewer at an upcoming Growth Management Implementation Strategy (GMIS) meeting. Preliminary area plans, design sheets and plan/profile drawings are included in this report as Figures 8.2, 8.3, 8.4 and 8.5 in **Appendix A**.

Given the gravity sanitary outlet will not be easily relocated once complete, it is anticipated the proposed utility easement and future development Block (Block 3) will be revised to a municipal servicing easement following the establishment of the ultimate site access to the west across from Venture Gate. The proposed Municipal watermain within this corridor is also anticipated to remain to provide additional looping in the ultimate site condition. Final sizing of the easement will be confirmed at detailed design.

Sanitary Outlets

The proposed development is anticipated to drain to a proposed 375-450mm diameter sewer extension along Hamilton Road towards the existing Municipal Gravity sanitary sewer on Hamilton Road approximately 450m to the west of the subject site near the corner of Hamilton Road and Commissioners Road East. Per direction from the City, this sewer will be sized to service not only the proposed development, but also external lands to the west (MN#22307 Hamilton Road, ~5 ha) and east (MN#2084-2176 Hamilton Road, ~79 ha) of the subject site. The subject site itself is identified on the area plan/design sheet for the aforementioned gravity sewer (City Record Drawing #19919) in accordance with the proposed ICI land usage (100 persons per hectare). Sewage leaving the development will be drained via the aforementioned gravity sewers towards the East Park SPS and ultimately the Pottersburg PCP. Timing of the external sanitary sewer extension construction by the developer will be dependent on the approvals process and market trends driving servicing of the subdivision, but ideally could be completed in tandem with the City's Hamilton Road Improvements project in 2027-2028. Anticipated trench restoration limits for the proposed extension are identified on the P&P Figures 8.3 and 8.4 in **Appendix A**.

As noted previously, in accordance with City record drawing #19919 the subject site has been allotted capacity within the City's Municipal sanitary sewer system up to a maximum density of 100 persons/ha in accordance with the proposed ICI land usage. It is notable that the catchment area on drawing #19919 (part of catchment BP-1) includes the entire 45.6 ha property which includes portions of the site identified as Environmental Reserve and unsuitable for development. As such, the maximum allotted population for this development of 4,560 is considerably higher than the proposed population of 693.

3.3.3 Proposed Water Servicing

Water Servicing Strategy

The entire development will be serviced for potable water and fire protection by connecting to the existing 600mm diameter Municipal watermain located on Hamilton Road. This system is looped both west to the intersection of Hamilton Road and Commissioners Road East and to the east to the intersection of Hamilton Road and Veterans Memorial Parkway. All existing municipal watermain in proximity to the site has been confirmed by the City to be part of the low-level pressure system with a hydraulic grade line (HGL) of 301.80m. The existing and proposed water network in proximity to the proposed development is identified on Figure 9.1 (**Appendix A**).

The subject site is surrounded to the north by existing Environmental Reserve lands unsuitable for development and to the east and south by existing Arterial Roadways. There is an existing horse ranch located to the west of the subject site which is identified in the London Plan as future light industrial property. Based on this, it is anticipated that a future extension of a Municipal watermain may be required through the western branch of Street 'A' if and when those lands are developed.

Given the gravity sanitary outlet will not be easily relocated once complete, it is anticipated the proposed utility easement and future development block (Block 3) will be revised to a municipal servicing easement following the establishment of the ultimate site access from the western property across from Venture Gate. The proposed municipal watermain within this corridor is also anticipated to remain to provide additional looping in the ultimate site condition. Final sizing of the easement will be confirmed at detailed design.

Projected Water Demands

No special design considerations are anticipated for the successful completion of this development.

Based on the water design flows and peaking factors as outlined in the City of London's DSRM and the MECP Design Guidelines for Drinking Water Systems, the projected water demands for the subject site are approximated in Table 2 below. It is notable the proposed ICI area includes assumed future expansion of Block 2 to include Block 3 following establishment of the ultimate subdivision entrance across from Venture Gate as a worst-case scenario. Refer to the design sheet provided in **Appendix A**.

Table 2: Summary of Assumed Design Population/Water Demands Flows

Type of Development	Development Area (ha)	Estimated equivalent residential Population	Average Day Demand (L/s)	Max Day Demand (L/s)	Peak Hour Demand (L/s)	Fire Flow Demand (L/s)
ICI	6.93	764	2.25	7.86	17.52	150.0
Open Space/Roadways	2.06	0	N/A	N/A	N/A	N/A
Total:	8.99	764	2.25	7.86	17.52	

Detailed hydraulic modeling has not yet been undertaken for the proposed development but will be completed during the Design Studies phase.

3.3.4 Stormwater Management

Background

The subject site is 45.6 ha, of which only approximately 9.0 ha (including municipal ROW widenings) is anticipated to be developed due to a substantial portion of the property being designated as Environmental Reserve lands (refer to the attached Draft Plan). The site is located within the South Thames Subwatershed and more specifically the former Fekete Drain (channel) which bisects the site. See Figure 10.1 in **Appendix A** for the location of the overall Fekete channel in relation to the subject site. The upstream lands to the south (Innovation Park Industrial Subdivision) are serviced by multiple wet pond Stormwater Management Facilities (SWMF's), three (3) of which discharge directly into the former Fekete drain.

Grading/Strom Servicing

The subject site has moderate existing topographic variation with elevations ranging from approximately 262.0m at the southwest corner to approximately 253.4m within the former Fekete drain in line with the northern boundary of Block 5. The existing site topography is generally rolling outside of the embankments on either side of the former drain, draining toward the channel.

The site is anticipated to include a mixture of cut and fill areas to support the proposed servicing and roadworks strategy. A preliminary grading design and cut/fill prepared for the development identified that fill operations will primarily occur on the southwest corner of the property (including Street 'A', Street 'B' and part or all of the proposed development blocks) and cuts will primarily occur along the east end of the property (primarily within parts of Blocks 3 4 and 5). The geometry of the proposed open space and compensation Blocks (Blocks 6, 7, 8, 9, 10 and 11) were selected in accordance with direction from the developer's ecological consultant, including setbacks and buffers from the various ecological features on the site. These blocks are intended to remain generally undisturbed from a grading perspective. A copy of the proposed preliminary grading design, the anticipated road profiles for the Interim and Ultimate Hamilton Road connections and a cut/fill tick plan are appended to this report as Figures 10.2, 10.3, and 10.4 respectively.

It is anticipated based on existing site topography that a single municipal storm sewer outlet will be required, discharging on the east side of the existing Fekete channel. The outlet will service both the higher topographic lands on the southwest corner of the Draft Plan (including the west section of Street 'A', Street 'B' and Blocks 1, 2, and 3), and the lower topographic lands on the northeast corner of the Draft Plan (including the east section of Street 'A' and Blocks 34 and 5), discharging either at a headwall to be integrated in the downstream wingwall (or directly inside) of the proposed box culvert crossing on the east side of the former drain. The existing and proposed storm sewer network is identified on Figure 10.1 (**Appendix A**).

Stormwater Management Strategy

The following SWM documents and criteria are understood to be applicable to the subject site related to the South Thames Subwatershed:

- Thames Valley Areas Study – Recommended Subwatershed Plan (1995, Aquafor Beech et. al):
 - Subject lands are Part of Tributary B2;
 - Study indicates that "in general there is very little need for flood control within the Thames valley areas" unless development results in flood risk for existing structures;
 - Identifies a minimum of 225m³/ha for quality control for Developments within Tributary B (equivalent of "enhanced" quality control (80% TSS Removal) for 70% imperviousness per MECP Stormwater Management Planning & Design Manual, March, 2003 – applicable for typical wet pond quality control strategies); and,
 - Identifies a requirement of 20mm of roof runoff infiltration required "on permeable soils subject to further works confirming feasibility at area plan/site plan stage."
 - Identified 110m³/ha of Erosion Control storage contingent on infiltration potential for future development.

- Functional SWM Servicing Report Innovation Park Subdivision Phase 4 (2008, AECOM):
 - Recommended 150m³/ha of Erosion Control Storage for SWMFs (suitable for Simplified Design Approach)
- DSRM Chapter 6 SWM (2025, City of London):
 - Section 6.9 Permanent Private Stormwater Systems (PPS) Case 3b.

The proposed storm sewer and stormwater management servicing strategy across the subject lands is identified in Figure 10.1 (**Appendix A**). The proposed subdivision will incorporate municipal storm sewers that include “Etobicoke” style infiltration systems under the main storm sewer (per CoL Standard Drawing SK-1, DSRM Figure 6.1) along Street ‘A’ that are anticipated to be assumed by the City. All minor flow drainage from the development will be collected within local storm sewers and discharged directly into the Fekete channel via the culvert structure which approximately bisects the site. Major system overland drainage will also follow the proposed road network and be conveyed to the drain where feasible. SWM control for the subdivision will be primarily provided through onsite PPS given the limited municipal roadway length and spatial constraints and proximity to the channel, supplemented by the proposed Etobicoke systems. Each block will be provided with a private storm sewer network and overland flow route that discharges both controlled minor and major storm flows either into the Municipal Right-of-way (Street ‘A’) or directly to the former Fekete Drain. Along the length of the Fekete channel that will remain open, buffers and setbacks have been applied to proposed development blocks in accordance with direction from the Developer’s Ecologist (NRSI).

Stormwater Management Quantity Controls

Stormwater Management quantity controls on the proposed development can be generally separated into two categories: the proposed Development Blocks (PPS – comprising storage volume, infiltration opportunities and flow controls) and the Municipal road network (comprising minor flow controls).

Development Blocks

Within each of the development blocks, PPS controls are anticipated to apply. Such systems are to be designed in accordance with the applicable subwatershed Study and the City’s DSSRM guidelines (PPS Case 3B). As of the date of this report, it is anticipated the requirements for such developments would be as follows:

- Quantity Control – Ensure that peak flow from the site does not exceed pre-development conditions;
- The major flows to be controlled on site up to the 100-year event and the site grading is to safely convey the 250-year storm event; and,
- 100% of quality (Enhanced - Level 1) and erosion controls are to be provided for the lands to be developed, as per the applicable subwatershed Study.

Block level PPS controls are also anticipated to include various Low Impact Development (LID) controls to encourage infiltration where feasible in accordance with current best management practices. It should be recognized that implementation of lot level storm recharge measures is typically contingent on native soil types. Based on prior investigations by the Developer’s Geotechnical consultant, site subsoils are anticipated to be primarily silt till which is generally not conducive to groundwater recharge, with some

localized deposits of more porous sand and gravel materials. Implementation of LID infiltration measures should be assessed on a site-by-site basis as part of the PPS design, where soils are conducive.

Municipal Roadways

Due to the comparatively small catchment area represented by the proposed road network (~0.8 ha), the PPS measures being proposed on the tributary private site blocks and the fact that the 1995 Thames Valley Recommended Subwatershed Plan does not identify flood storage as a requirement within the Thames Valley areas, it is anticipated an end-of-pipe solution to provide quantity control (SWMF) will not be necessary for the Municipal roadworks. However, the proposed Etobicoke systems are anticipated to provide a measure of quantity control to supplement the PPS systems within the development blocks (treatment train approach), generally targeting flows during minor events 25mm-2yr.

Stormwater Quality

Stormwater Management quality controls on the proposed development can similarly be separated into proposed Development Blocks and the Municipal road network.

Development Blocks

Based on the criteria identified in Section 6.2.1.1 of the DSRM and direction from the City, it is anticipated an enhanced (80% TSS removal) level of quality control is required for storm runoff leaving the subject site. This criterion should be followed for the sizing of the anticipated on-site PPS controls such as Oil-Grit Separators (OGS units) designed on the proposed development blocks.

Municipal Roadways

Due to the comparatively small catchment area represented by the proposed road network (~0.8 ha), quality control for the Municipal roadworks are anticipated to be provided by the proposed Etobicoke systems rather than utilizing OGS units to provide a measure of quality control with some ROW inlet pre-treatment to supplement the OGS units within the development blocks (treatment train approach).

3.3.5 Stormwater Related Studies

Natural Hazards – Flood Delineation Study

Pursuant to the Feb. 2024 UTRCA IPR comments, a Flood Line Delineation Study including model (DevEng) has been completed to assess both the existing (pre) and post-development flood line limits, and is included in this submission under separate cover. The post-development condition model includes a proposed roadway crossing and culvert, along with localized channel conveyance improvements. The proposed channel improvement works primarily related to sediment deposit removal downstream of Hamilton Rd. to provide a positive channel centerline slope with some minor centerline realignment. The channel and culvert are suitably sized to safely convey the Regional Flood (250yr) event without impact to safe access. Confirmation of the culvert size (1.8m H x 3.9m W box), length slope and integration of the subdivision storm sewer outlets into the culvert wingwall is anticipated through future detailed design.

Drainage Act

Based on information received from the City, (Drainage Abandonment Assessment, By-law No. DR-96, Bill No. 255, 2007), the portions of the former Fekete and Hudson Drains on the site have been abandoned under the Municipal Drainage Act. As such, no further drainage assessments are applicable. Relevant information is included under the Flood Delineation Study included in this submission under separate cover.

Fluvial Geomorphic Study

A Fluvial Geomorphic study (Momentum Earth Inc.) has been completed to assess erosion and natural channel design elements related to the proposed site storm design, culvert crossing and channel conveyance improvements. The study is included in this submission under separate cover.

Feature-Based Water Balance Analysis

Refer to the Geotechnical and Hydrogeological assessment Report (Stonecairn Inc.) which includes a feature-based water balance assessment component to address UTRCA/City comments related to annual volume targets and recharge initiatives. The report has been included in this submission under separate cover.

Slope Stability Study

Refer to the Geotechnical and Hydrogeological Report assessment (Stonecairn Inc.) which includes a slope stability study component to address UTRCA natural erosion hazard and setbacks along the channel. The report has been included in this submission under separate cover.

EIS for Buffers to Watercourse

Refer to Section 6 for discussions related to EIS impacts and buffer setbacks (NRSI Inc.) to the channel which have been accommodated in the Draft Plan and above noted studies.

4.0 Supporting Technical Studies

4.1 Environmental Impact Assessment

NRSI prepared and Environmental Impact Assessment ("EIA") to assess impacts of the proposed development on natural heritage features of the subject lands. The EIA was updated in March 2026 in response to comments provided by City staff and the Upper Thames River Conservation Authority.

NRSI summarizes the EIA as follows:

"Natural Resource Solutions Inc. (NRSI) was retained in April 2021 by Kreative Development Inc. to complete an Environmental Impact Study (EIS) for a proposed development on the east side of London, Ontario. The proposed development includes a mixture of commercial and industrial development blocks and associated roads, which includes a proposed crossing over Fekete Drain.

The subject lands are approximately 16ha in size. The lands currently consist of cultural meadow, cultural woodland, small wetlands, a mature contiguous woodland in the north, and the Fekete Drain and associated riparian habitat that crosses the property in a north-south direction. Hedgerows and landscape trees in the southeast corner of the subject lands indicated the location of a former homestead. The subject lands are located within the Dorchester Corridor subwatershed and are within Ecoregion 7E.

Natural heritage information was collected and reviewed to identify key natural heritage features, habitats and species that are reported from, or have the potential to occur within the study area. A comprehensive suite of terrestrial and aquatic surveys was conducted in 2021 and 2022 to characterize the subject lands, which included but were not limited to Ecological Land Classification (ELC), a three-season vegetation inventory, woodland and wetland boundary delineations, snake coverboard surveys, anuran call surveys, breeding and migratory bird surveys, aquatic habitat assessment, benthic invertebrate surveys, and fish community surveys. Field surveys meet the City's requirements, as discussed during a scoping meeting held November 13, 2024.

Several significant and sensitive natural features are present within the subject lands and study area. Several small wetlands are present, which are not considered provincially significant. These features were delineated with the UTRCA on June 21, 2022. A large woodland in the north of the subject lands and study area, as well as woodlands along the Fekete Drain have been identified as significant in accordance with the London Plan. The boundary of the woodland was determined in consultation with the City of London on June 21, 2022. Significant Valleyland associated with the Fekete Drain bisects the western half of the subject lands. A Cultural Savannah community and Cultural Woodland community were determined to not meet the City's definition of significance. The limits of the Meadowlily Woods Environmentally Significant Area were revised to only include the greatest limit of either the Significant

Woodland, and or the revised Significant Valleyland where the feature overlaps the Significant Woodland as per the guidance received from the City of London ecology staff.

Based on the site review, no candidate bat roosting trees were identified within the area where tree removals are anticipated (southeast and southwest corners). Candidate SAR bat habitat is located within the woodland, including all treed communities (FOD, CUP, CUS). Significant Wildlife Habitat (SWH) has been confirmed for Terrestrial Crayfish and Eastern Wood-Pewee. Candidate SWH has been identified in the study area for Bat Maternity Colonies, Woodland Raptor Nesting Habitat, and Woodland Area-Sensitive Bird Breeding Habitat. Additionally, regionally significant vascular plant species have been identified from vegetation communities within the subject lands.

Comprehensive buffers have been identified for significant and sensitive natural features within the subject lands. A 30m buffer has been identified on either side of the Fekete Drain, notwithstanding the proposed crossing. A 30m buffer has been identified from the Significant Woodland and both Terrestrial Crayfish habitats, except for one small area of buffer encroachment due to the proposed drain crossing. Several small wetlands and portions of wetlands are proposed for removal from the subject lands in support of the proposed development. Four small MAM2 communities are proposed to be partially removed / impacted, which will be compensated for at a ratio of more than 1:1 within the subject lands. The removal of treed vegetation communities will be compensated for within the additional compensation lands. A pathway is proposed to be integrated into the outer buffer of the natural heritage features and will connect through the proposed Fekete Drain crossing.

An assessment of potential impacts resulting from the proposed development has been completed as part of this study. No significant negative impacts are anticipated as long as recommended mitigation, compensation, and restoration measures are implemented. Restoration plantings will provide a robust corridor along the Fekete Drain and further improve the ecological function of the Meadowlily Woods Environmentally Significant Area to result in a net positive effect.

At this stage of the proposed project, the intent and requirements of all environmental policies of the City of London Plan, the Provincial Planning Statement, and other relevant legislation have been met. Recommendations are provided within this report for the detailed design stage of the development to ensure that all relevant policies and regulations continue to be met, which include, but are not limited to:

- Development of a comprehensive Grading Plan for the proposed development.
- Development of a Tree Inventory and Preservation Plan (TIPP) to address tree removals and compensation requirements for the proposed development.
- Development of a detailed Stormwater Management (SWM) Plan and updated feature-based water balance to ensure the post-development water budget is within 10% of the pre-development water budget.
- Development of a Restoration Plan to include a planting plan for the buffer areas within the subject lands.
- Development of a wetland compensation plan addressing hydrologic requirements for the wetland and potential Low Impact Development measures, as well as a planting plan for the wetland.

- Development of an Environmental Monitoring Plan (EMP) to identify management and monitoring requirements during and post-construction.
- Development of a detailed Erosion and Sediment Control (ESC) Plan by a qualified engineer.
- Development of a detailed Salt Management Plan by a qualified specialist.

Figure 4 identifies compensation areas.

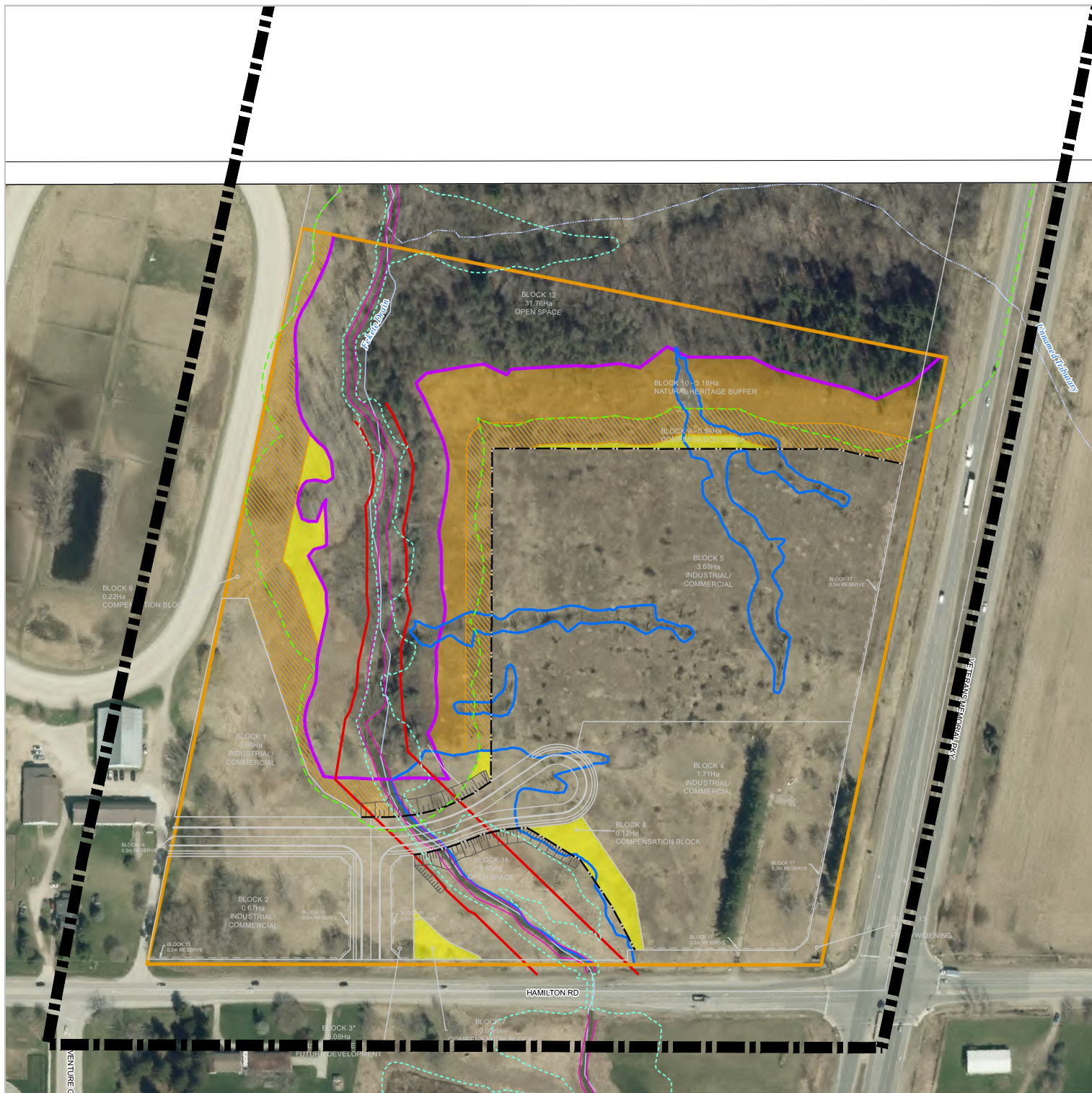


Figure 4: NRSI Map 7B - Compensation Areas (March, 2026.)



4.2 Hydrogeological Investigation and Geotechnical Assessment

Stonecairn Consulting ("Stonecairn") prepared a combined Geotechnical Investigation and Hydrogeological Assessment. Nine boreholes were advanced to depths ranging from 5.0 metres to 8.1 metres below existing grade, and monitoring wells were installed in three of the boreholes. Two piezometers were installed within the tributary drain in the southwest of the subject lands to confirm shallow groundwater and surface water levels. All samples were provided to a lab for detailed examination and selective testing.

Stonecairn states: "The boreholes generally revealed a layer of surficial topsoil which is underlain by interlayered deposits of sand and silt till. Shallow groundwater is present in the near-surface sandy soils, perched above the less permeable silt till, with stabilized water levels measured some 0.4 to 3.2 m below existing ground surface (generally below Elevation 257.0 m). Depending on the timing of construction, it is anticipated that seasonal conditions may cause variations in the stabilized groundwater level." Additionally, the groundwater measurements indicate that the shallow flow generally follows a north-westerly direction, towards the Thames River.

Water quality sample results for groundwater and surface water samples collected onsite do not indicate adverse water quality or significant groundwater contamination. Stonecairn notes that near surface samples indicate salt-related impacts, which is not unexpected, given the proximity of Hamilton Road, stormwater runoff within the existing drain, and typical winter safety / salt application.

Regarding hydrogeological impacts, Stonecairn states: "Given the naturally low permeability of the predominant silt till soils which underlie the site, the intermediate and deep overburden aquifers are not expected to be exposed to contamination from surface sources. However, shallow groundwater contained within the near surface sandy soils may be susceptible to water quality impacts as a result of surface activities during construction, since it does not have the benefit of a low-permeability protective soil layer above it.

A tributary of the south branch of the Thames River (identified as the Fekete Drain) transects the southwestern section of the site. The shallow groundwater which exists near surface is expected to be influenced by the restrictions which will exist for surface water to infiltrate directly into the near surface soils.

Where possible, clean stormwater runoff (from roof-tops and landscaped areas) may be able to be directed towards the channel and naturalized areas along the drain). Filtration and treatment of any stormwater runoff from the site pavements is recommended, to prevent the introduction of contaminants into the subsurface. Providing this surface water contribution is recommended to sustain base flows to the watercourse, and to support the wildlife and vegetation within the feature."

Additional commentary and recommendations are provided in the report regarding potential impacts from construction equipment, uncontrolled erosion/sediment discharge, snow removal and salt management, and well decommissioning.

Stonecairn prepared a feature-based water balance assessment for the north woodlot and for the Fekete Drain. The assessment concludes that "The proposed development at the site does not alter the water

balance assessment for the north woodlot. Based on the results of the assessment, the proposed development will result in a decrease in annual infiltration Fekete Drain. Run-off volumes increase as a result of the urbanization of the site, and as a result of the stormwater management strategy, the stormwater run-off will change by 166%. Consideration may be given to incorporating low-impact development (LID) measures during the detailed design stage to attenuate or provide temporary storage of stormwater, and/or promote infiltration. Any design of LID features must have regard for soil and groundwater conditions at the site.”

A slope stability assessment was also conducted along the valley slopes of the Fekete Drain and to establish an Erosion Hazard Limit, in consultation with the geomorphological assessment of the watercourse. The Erosion Hazard Limit has been incorporated into the Draft Plan. Stonecairn provides the following summary regarding slope stability:

“The overall slope stability is considered to be in a stable condition, as indicated by the slope stability analyses presented previously. From a geotechnical standpoint, development outside of the erosion hazard limit can be carried out without detrimental impact to the long-term slope stability, provided that some care is taken by the contractors doing the work, and by adhering to the following recommendations.

- Where possible, uncontrolled surface water flows over the face of the slope should be minimized, to reduce the risk of surface erosion. Erosion control measures may be required during construction, to reduce the risk of concentrated surface water flows from causing surface erosion.
- Excavated soils should not be placed over the tableland near the crest of the slope. Any fill placement or changes to existing grades in proximity to the site slope may be subject to review and approval by the UTRCA.
- Care must be taken when excavating for building footings and foundations in proximity to the top of the slope, to ensure that excavations are provided with adequate sidewall support. The design of any excavation support system should be prepared by a certified engineer, and should consider the loading associated with the sloped surface.
- In the event that existing drains are exposed during the excavation and site work for the proposed residence, the drains should be restored and re-routed to ensure continued controlled flows into an appropriate discharge location away from the slope face.
- Vegetation on the slope should be maintained. A program of plantation where appropriate, including deciduous trees and deep-rooted vegetation is recommended.
- Final design drawings including final building locations should be reviewed by this office to ensure that the comments and recommendations provided in this report have been properly interpreted.

It is also noted that portions of the drain alignment may be subject to larger setback values based on the geomorphological review work for the site, as well as the ecological setbacks which are identified through the EIS. Where greater setbacks are identified, they should take precedent in determining the final development setback limits.”

Stonecairn provides detailed geotechnical comments and recommendations to assist with the design and construction of the proposed development, including for the proposed Fekete Drain crossing. These considerations will be addressed through detailed design. Refer to the full report for additional details.

4.3 Geomorphic Assessment

This section was prepared by Momentum Earth Sciences Ltd.:

"Momentum Earth Sciences Ltd. conducted a geomorphic assessment to evaluate the erosion hazard limit of the Fekete Channel and provide recommendations related to the proposed draft plan. The study was undertaken in accordance with the Proposal Review Meeting Summary & Record of Consultation (June 2023) and the Environmental Study Scoping Checklist developed in collaboration with the City of London and the Upper Thames River Conservation Authority (UTRCA). It also considered key natural hazard policies and regulations, including the Provincial Planning Statement (2024), The London Plan (2020), the Upper Thames River Conservation Authority regulations, and the Environmental Planning Policy Manual (2006).

Background

The Fekete Channel, which originates approximately 2 km upstream of Hamilton Road, is situated in the Dorchester watershed and ultimately joins the South Thames River roughly 1 km downstream from the subject property. The South Thames River runs along the northern limit of the property, with adjacent lands consisting of floodplain and well-vegetated valley slopes. The Fekete Channel subwatershed spans approximately 2.77 km² and is underlain primarily by silt till soils, with sand and gravel deposits near the Thames River.

Historical aerial photograph assessments indicate that land use in the drainage area and surrounding lands was predominantly agricultural, transitioning over time to include urban expansion, commercial developments, and stormwater management facilities, particularly between 1999 and 2014. The Fekete Channel within the subject property has historically lacked wooded vegetation due to past agricultural clearing, and modifications such as channel realignments (i.e., straightening and disturbances) have limited natural channel migration.

Field assessments conducted in November 2024 involved standardized rapid visual assessments, verification of reach extents, and photographic documentation of historical and current channel conditions. Four reach extents were identified from the South Thames River confluence to Hamilton Road, with Reaches F-C3 and FC-4 within the subject property.

Geomorphic Characterization

- Reach FC-1: At the confluence with the South Thames River, this reach is a moderately sinuous, perennial watercourse within a confined valley. Vegetation includes a mid-aged deciduous forest community and wetland grasses near the confluence.
- Reach FC-2: Located downstream of the subject property, this reach is moderately sinuous and situated in a partially confined valley. Vegetation includes scattered deciduous trees and wetland grasses, particularly in area of a former on-line pond.

- Reach FC-3: A straightened, perennial watercourse within a partially confined valley, this reach exhibits a moderate gradient and high degree of entrenchment, limiting floodplain interaction. Vegetation includes White Pine and Scot's Pine, with signs of active erosion and disturbances such as an existing beaver dam at the upstream reach break.
- Reach FC-4: A historically straightened, perennial watercourse within an unconfined valley, displaying a low gradient and high entrenchment. The east side of the channel bank exhibits more confinement than the west floodplain area. Riparian vegetation is continuous, dominated by Broad-leaved Cattail and Common Reed. Indicators of active erosion and planform adjustments are present, and sediment deposition is influenced by backwater conditions from the beaver dam.

Rapid geomorphic assessments determined that the reaches were 'in transition', with evidence of planform adjustments and widening. The sensitivity scores for Reaches FC-3 and FC-4 were 0.32 and 0.30, respectively, while downstream reaches F-C2 and FC-1 had lower sensitivity, with scores of 0.27 and 0.25.

Erosion Hazard Limit Determination

Reach FC-4, an unconfined system, required a meander belt assessment per applicable guidelines. Based on empirical modeling, historical data, and observed planform adjustments over a 56-year period, a recommended meander belt width of 29 m was established.

Reach FC-3 transitions into a confined valley, requiring a slope stability assessment. This study provided a 5 m toe erosion allowance based on soil structure and watercourse stability conditions to support the geotechnical assessment on the subject property.

Additionally, an erosion access allowance of 6 m was applied, consistent with the Technical Guide – Rivers and Streams: Erosion Hazard Limit document (MNR 2002).

Draft Plan Considerations

Street A Crossing

To support the proposed development, additional geomorphic recommendations were provided for a culvert crossing structure in Reach FC-4. The City of London Design Specifications & Requirements Manual outlines standards for storm culverts, emphasizing the need to account for channel characteristics, erosion potential, and future channel migration. The proposed structure—a 1.8 m H x 3.9 m W concrete box culvert—is designed to meet the City's hydraulic requirements, including conveyance of the 250-year regional flood. The final dimensions for culvert will be confirmed through detailed design and include additional considerations for aquatic and terrestrial requirements as outlined in the City's Manual.

Stormwater Management Recommendations

Stormwater management strategy on the subject property was able to achieve the erosion control objectives outlined in the City's manual. In this regard, the erosion control criterion of 150 m³/ha for the Fekete Channel subwatershed, established in previous studies, remains valid for the subject property. The proposed stormwater strategy integrates on-site storage and infiltration facilities to achieve the erosion control targets, with future potential refinements to address water balance

requirements for sensitive features. If stormwater management strategies are modified, and the target is not achieved, additional erosion potential analyses downstream may be required.

To minimize grading impacts, proposed stormwater outfalls have been integrated into the culvert structure's wing walls. Final culvert dimensions, headwall/wingwall details, and environmental integration will be confirmed during detailed design, including measures to mitigate increases in erosion.

This geomorphic assessment provides a foundation for future land use planning, environmental considerations, and infrastructure development within the subject property. Further discussions with the City of London may be needed to discuss the site constraints and environmental requirements."

4.4 Flood Delineation Study

Development Engineering prepared a Flood Delineation Study to "... determine the existing regulatory flood line to supersede the generic flood line mapping, and to provide technical justification for a proposed roadway crossing and culvert, and address engineering-related concerns in advance of a future Section 28 Permit application. This report includes preliminary sizing of a culvert to suitably convey the Regional Event (250yr), and design coordination for channel geomorphic, environmental, geotechnical/hydrogeological and engineering servicing subdisciplines."

The Study was coordinated with the other technical reports, including consideration for downstream erosion and naturalized channel design, channel geomorphic recommendations, EIS recommendations, and water balance.

The Study concludes:

- "Existing conditions and post-development models are completed to assess the localized change in flood line for subject site with proposed channel cleanout (remediation) and culvert crossing works to safely convey the Regional Event (250yr).
- Event peak flows were taken from the 2008 AECOM Innovation Park (Post-Dev.) peak flows for 2yr to 250yr events.
- The post-development model includes the proposed roadway crossing embankment with culvert and the results show the regional flood is generally contained within the channel slopes except for localised depressed overbank areas.
- The proposed 1.8m H x 3.9m W box culvert has adequate flow capacity to safely convey the regional flood flow without adverse impacts and in combination with the restored channel profile and improved conveyance sections, lowers flood line elevations across the site."

It is notable that review of the Flood Delineation Study (Dated May, 2025) by the City of London and the Upper Thames River Conservation Authority (UTRCA) has resulted in minor comments which are not anticipated to change the recommendations of the report and thus will be addressed during detailed design (Design Studies).

4.5 Transportation Impact Assessment

Paradigm Transportation Solutions ("Paradigm") prepared a Transportation Impact Assessment in support of the proposed development. Paradigm summarizes their Assessment as follows:

"TIA Scope

The scope of the Transportation Impact Assessment for the proposed development includes:

- Study Area Intersections:
 - Hamilton Road and Venture Gate (unsignalized);
 - Hamilton Road and Veterans Memorial Parkway (signalized); and
 - Hamilton Road and Site Access (Street 'B') (new).
- Analysis Periods: Weekday AM and PM peak hours.
- Traffic Conditions: Existing (2025) and five years after development completion (2035).

Conclusions

Based on the investigations carried out, it is concluded that:

- Existing Traffic Conditions: All study area intersections are currently operating at acceptable levels of service.
- Development Trip Generation: The development is forecast to generate 263 AM peak hour trips and 339 PM peak hour trips.
- 2035 Background Traffic Conditions: All study area intersections are forecast to operate within acceptable levels of service, except for the following critical movements:
 - Veterans Memorial Parkway and Hamilton Road
 - The eastbound left-turn movement is forecast to operate with LOS E and F during the AM and PM peak hours, respectively, as well as a v/c ratio greater than 0.90 during both peak hours; and
 - The southbound through movement is forecast to operate with LOS E and a v/c ratio greater than 0.90 during the PM peak hour.
- 2035 Total Traffic Conditions: All study area intersections are forecast to operate similar to background traffic conditions with the addition of the following critical movements:
 - Veterans Memorial Parkway and Hamilton Road
 - The eastbound left-turn movement is forecast to operate with 95th percentile queues exceeding the available storage of 95 metres during the AM and PM peak hours.
 - Hamilton Road and Site Access

- The southbound left-turn movement is forecast to operate with LOS F and a v/c ratio greater than 0.90 during the PM peak hour.
- Site Access (North-South Road, Street B):
 - Left-Turn Lanes: An eastbound left-turn lane with 40 metres of storage is warranted on Hamilton Road at the proposed site access under total traffic conditions. The required eastbound left-turn lane could be implemented as a back-to-back left-turn arrangement with the existing westbound left turn lane at Venture Gate, and both having the same storage length of 45 metres as the existing WBLT lane at Venture Gate.
 - Right-Turn Lanes: A westbound right-turn lane should be considered at the site access intersection as the westbound right-turn volumes under total traffic conditions are forecast to exceed the warrant threshold of 60 vph. The added lane could be part of the planned future widening of Hamilton Road to a four-lane cross-section.
- Transportation Demand Management: The following TDM measures should be considered at the subject development:
 - Site design to include internal walkways to facilitate active transportation and transit access;
 - Bicycle parking in accordance with the City's Zoning By-Law; and
 - Transit and active transportation information provided in a welcome package to new employees and/or posted in
 - central locations on-site.

Recommendations

Based on the findings of this study, it is recommended that the subject subdivision be considered for approval as proposed, with the following turn-lane improvements:

- An eastbound left-turn lane with 40 metres of storage on Hamilton Road at the Site Access; and
- A westbound right-turn lane on Hamilton Road at the Site Access."

Review of the Transportation Impact Assessment by the City of London has resulted in minor comments which staff have confirmed are to be addressed during detailed design.

5.0 Planning Policies

5.1 Planning Act

Section 51 of the *Planning Act* sets out the requirements for the legal division of land and/or property. Specifically, Section 51(24) outlines the criteria that an approval authority shall have regard to when making decisions on the legal division of land or property. The applicable criteria and the justification are outlined in the table below.

Table 3: Criteria for the Evaluation of a Draft Plan of Subdivision

Section	Criteria	Response
51(24)	In considering a draft plan of subdivision, regard shall be had, among other matters, to the health, safety, convenience, accessibility for persons with disabilities and welfare of the present and future inhabitants of the municipality	The Draft Plan incorporates development limits that have been established based on a combination of studies to delineate the existing Natural Heritage Features, Natural Hazards, updated Floodlines, crossing requirements, and appropriate buffers and compensation blocks to protect the features and hazards.
a	The effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;	The proposed development addresses matters of Provincial interest: • Natural heritage features and functions of the subject lands have been evaluated and all recommendations from the Environmental Impact Study will be implemented. • The subject lands are within the Urban Growth Boundary, conserving agricultural resources and facilitating the orderly development and safe and healthy communities. The lands are proximate to educational, health, social, cultural, and recreational facilities. • The subject lands do not contain any features with architectural, cultural, historical, archeological, or scientific interest.

Section	Criteria	Response
		• The proposed development implements the Official Plan designation, representing orderly development. • The proposed development can be adequately serviced using existing municipal infrastructure (sanitary services to be extended to the subject lands at developer cost), protecting the financial and economic well-being of the Province and City of London. • Natural hazards have been delineated and no development is proposed within natural hazard lands. • The light industrial development will provide employment opportunities. • The proposed development can be serviced by transit, should transit be made available to this area of the City.
b	Whether the proposed subdivision is premature or in the public interest;	The proposed development is within the Urban Growth Area on lands designated for light industrial development in the Official Plan.
c	Whether the plan conforms to the official plan and adjacent plans of subdivision, if any;	The proposed development conforms to The London Plan and is compatible with, and complementary to, adjacent land uses.
d	The suitability of the land for the purposes for which it is to be subdivided;	The site is designated for light industrial uses. The land can be adequately serviced. Natural heritage features and hazards have been evaluated and appropriate development limits have been implemented in the Draft Plan. Vehicular access has been consolidated into one interim access, and the Draft Plan provides for connections to the extension of Venture Gate (the ultimate condition).

Section	Criteria	Response
d.1	If any affordable housing units are being proposed, the suitability of the proposed units for affordable housing;	Not applicable. No residential uses are proposed.
e	The number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;	The proposed public street network will connect with Hamilton Road. An interim and ultimate road network are identified on the Draft Plan.
f	The dimensions and shapes of the proposed lots;	All proposed Blocks meet the minimum lot and area requirements of the proposed zone and are appropriately sized for light industrial development. All proposed lots have frontage on the proposed internal street network.
g	The restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land;	N/A
h	Conservation of natural resources and flood control;	An Environmental Impact Study and Flood Delineation Study were prepared in support of the development. Recommendations from the Studies will be implemented and have been incorporated into the Draft Plan as development limits.
i	The adequacy of utilities and municipal services;	The proposed development will be municipally serviced. Sanitary services will be extended to the subject lands at the developer's cost.
j	The adequacy of school sites;	Not applicable.
k	The area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;	The required road widenings and ultimate street network will be conveyed to the City.
l	The extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy; and	The new buildings will be constructed in accordance with the latest Building Code, which establishes standards for energy efficiency.

Section	Criteria	Response
m	The interrelationship between the design of the proposed plan of subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area designated under subsection 41 (2) of this Act or subsection 114 (2) of the <i>City of Toronto Act, 2006</i> .	Site Plan Control applications will be required for each block and will address detailed design.

The criteria of Section 51(24) of the *Planning Act* have been considered in the design of the proposed development.

5.2 Provincial Planning Statement

The Provincial Planning Statement, 2024 ('PPS') was issued under section 3 of the Planning Act and came into effect October 20, 2024. The PPS provides overall policy direction on matters of provincial interest related to land use planning and development and sets the policy foundation for regulating the development and use of land province-wide. Generally, Chapter 1 of the PPS details that this policy instrument provides a vision for land use planning in Ontario that: prioritizes growth in urban and rural settlements; prioritizes compact and transit-supportive design, where locally appropriate; and optimizes investments in infrastructure and public service facilities to support convenient access to housing, quality employment, services and recreation.

The role of the PPS is also defined in Chapter 1:

"The Provincial Planning Statement provides policy direction on matters of provincial interest related to land use planning and development. As a key part of Ontario's policy-led planning system, the Provincial Planning Statement sets the policy foundation for regulating the development and use of land province-wide ..."

The proposed Applications have been evaluated with regard to the policy direction and provisions of the PPS, as discussed below.

5.2.1 Assessment of Proposal

The proposed development has been evaluated with regard to the policy direction and provisions of the PPS. Based on this analysis, it is our opinion that specific policies in Chapter 2 (Building Homes, Sustaining Strong and Competitive Communities), Chapter 3 (Infrastructure and Facilities), Chapter 4 (Wise Use and Management of Resources) and Chapter 5 (Protecting Public Health and Safety) are particularly relevant to this proposal. The following commentary demonstrates how this project is consistent with the identified policies.

Chapter 2: Building Homes, Sustaining Strong and Competitive Communities

The PPS provides a vision for land use planning in Ontario that focuses growth within settlement areas, and encourages an efficient use of land, resources, and public investment in infrastructure. To support this vision, the PPS defines a number of policies to promote strong and competitive communities. These policies are set out in Section 1.0, and address such matters as efficient development and land use patterns, employment areas, housing, public spaces/open space, infrastructure and public service facilities, long-term economic prosperity, and energy and air quality.

Given the nature and scale of the proposed light industrial development, in our opinion, the following policies contained within Section 2.1 (Planning for People and Homes), Section 2.3 (Settlement Areas and Settlement Area Boundary Expansions), Section 2.8 (Employment) and Section 2.9 (Energy Conservation, Air Quality and Climate Change) are germane to this proposal.

Policy Review

1. Policy 2.1.6 sets out several policies to support the achievement of complete communities, including:
 - a. Policy a), which generally prescribes that an appropriate range and mix of land uses, housing and transportation options, employment, public services facilities, other institutional uses, recreation, parks, open space and other uses should be accommodated to meet long-term needs.
2. Policy 2.3.1 directs that settlement areas shall be the focus of growth and development areas. Policy 2.3.1.2 further prescribes that land use patterns within settlement areas are to be based on a density and mix of uses that achieve several objectives, including:
 - a. “efficiently use land and resources;
 - b. optimize existing and planned infrastructure and public service facilities;
 - c. support active transportation;”
3. Economic development and competitiveness are supported under Policy 2.8.1.1, which sets out several objectives for planning authorities including:
 - a. “providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;
 - b. providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;”
4. Further, Policy 2.8.2.1 states that planning authorities are to plan for, protect and preserve designated employment areas for current and future uses, and ensure that the necessary infrastructure is provided to support current and projected needs.

5. Policy 2.8.2.2 requires planning authorities to protect employment areas that are located in proximity to major goods movement facilities and corridors for the employment uses that require those locations.
6. Policy 2.9 addresses energy conservation, air quality, and climate change, requiring planning authorities to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through a number of initiatives including the following with applicability to this project:
 - a. “support the achievement of compact, transit-supportive, and complete communities;
 - d. promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality;”

Policy Analysis

With respect to Policies 2.1.6 a) and Policy 2.8.2.1, the proposed Draft Plan is intended to encourage the efficient use of designated employment lands for light industrial purposes on lands designated for these purposes and within the City’s Urban Growth Boundary. The applications promote an appropriate mix of land uses within the subject lands and contribute to the further development of the Old Victoria planning district as a complete community.

Implementation of this proposal would facilitate an industrial development which is compatible with the local development context and supports the preservation of the City’s employment lands. The proposal provides opportunities for employment uses in proximity to major goods movement corridors (Highway 401) and residential uses to the west of the subject property along Hamilton Road and north of the subject property along Trafalgar Street.

Additionally, in our opinion, the application satisfies the other referenced policies of Chapter 2 given these considerations:

- The proposed land use pattern and road system promotes an efficient use of land and resources; permits densities that support efficient development;
- The property is supported by the City’s road network, municipal servicing infrastructure (existing and planned) and public service facilities;
- The subject lands are situated within a development area that includes a variety of industrial development, residential uses and public facilities. The site’s location relative to this mix of uses would help future employees minimize the length and frequency of vehicle trips. The Site’s layout would also support alternative transportation modes (walking, cycling) and future transit connections as the development in the area advances. Additionally, both Hamilton Road and Veterans Memorial Parkway are designated heavy truck routes that are appropriate for industrial development;
- Preliminary servicing reviews have been completed and confirm that adequate servicing capacity is available to accommodate the intended uses on the subject lands. It is also anticipated that the development associated with the Draft Plan proposal can be accommodated by existing public service facilities (Policies 2.3.1 and 2.9); and,

- The industrial permissions intended for the Subject Lands would promote economic development opportunities on vacant employment lands and respond to market demand for these types of uses. Economic benefits would also be derived from construction activities associated with site development (Policy Policies 2.8.1.1 and 2.8.2.1).

Taking these matters into consideration, it is our opinion that the proposal satisfies the referenced policies of Section 2.0 of the PPS.

Chapter 3: Infrastructure and Facilities

Based on our assessment of Chapter 3 of the PPS, it is our opinion that specific policies within Section 3.1 (General Policies for Infrastructure and Public Service Facilities), Section 3.2 (Transportation Systems) and Section 3.6 (Sewage, Water and Stormwater) have relevance to this proposal. The identified policies are described below.

Policy Review

1. Policy 3.1.1 requires infrastructure and public service facilities to be provided in an efficient manner, while accommodating projected needs and being coordinated and integrated with land use planning and growth management.
2. Further, Policy 3.1.2 sets out that prior to consideration of developing new infrastructure and public service facilities:
 - a. "the use of existing infrastructure and public service facilities should be optimized; and
 - b. opportunities for adaptive re-use should be considered, wherever feasible."
3. Policy 3.2 provides objectives for transportation systems, including the following which are relevant to this proposal:
 - a. Policy 3.2.1 directs that transportation systems should be provided that are safe, energy efficient, facilitate the movement of people and goods, and are appropriate to address projected needs and support the use of zero- and low-emission vehicles; and,
 - b. Policy 3.2.2 states that efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.
4. Policy 3.5.1 requires major facilities and sensitive land uses to be planned and developed to avoid, or if avoidance is not possible, to minimize and mitigate any potential adverse effects from odour, noise, and other contaminants, minimize risk to public health and safety, and to ensure long-term operational and economic viability of major facilities." Policy 3.5.2 applies when avoidance is not possible in accordance with Policy 3.5.1, and states: "... planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses is only permitted if potential adverse affects to the proposed sensitive land use are minimized and mitigated, and potential impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures."

5. Policy 3.6.1 prescribes policies guiding planning for sewage and water services, including the following that have particular importance to this project:
 - a. “accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services and existing private communal sewage services and private communal water services;
 - c. promote water and energy conservation and efficiency;
 - d. integrate servicing and land use considerations at all stages of the planning process;”
6. Policy 3.6.8 integrates policies guiding planning for stormwater management, including several that are germane to this proposed stormwater management strategy, as set out below:
 - a. “be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle;
 - b. minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads;
 - c. minimize erosion and changes in water balance including through the use of green infrastructure;
 - d. mitigate risks to human health, safety, property and the environment;
 - f. promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development”

Policy Analysis

Respecting Policies 3.1.1 and 3.1.2, implementation of this proposal would facilitate a compact development pattern that supports the efficient use of existing infrastructure and transportation systems and, for planned infrastructure, integrates cost-effective water/wastewater servicing.

Additionally, a Transportation Impact Assessment (“TIA”) has been prepared by Paradigm Transportation Solutions Limited (“Paradigm”) and confirms that the proposed road system addresses the objectives of Policy 3.2.

With respect to policies Policy 3.6.1 and 3.6.8, preliminary servicing reviews have been completed to confirm that the necessary servicing infrastructure would be available to meet projected needs. In particular, Development Engineering has prepared a servicing strategy which demonstrates that adequate municipal servicing is available for the proposed subdivision.

Chapter 4: Wise Use and Management of Resources

Chapter 4 of the PPS provides policy direction for natural heritage, water, agriculture, minerals and petroleum, mineral aggregate resources, cultural heritage and archaeology.

Pursuant to Map 5 (Natural Features) of the City of London Official Plan, the subject property contains Significant Valleylands and Unevaluated Wetlands, as well as forming part of the Meadow Lily ESA. Map 5 identifies that the Significant Valleyland extends east from the Thames River (South Branch) through

the subject property and towards the City's eastern boundary. The Unevaluated Wetland is located towards the centre of the site.

Given the existing site context, in our opinion, the following policies of Section 4.1 (Natural Heritage), Section 4.2 (Water) and Section 4.6 (Cultural Heritage and Archaeology) of the PPS have relevance to this development proposal.

Policy Review

1. Policy 4.1.1 states that natural features and areas shall be protected for the long term.
2. Policy 4.1.8 generally prescribes that development and site alteration shall not be permitted on lands adjacent to significant natural heritage features unless it has been demonstrated that the development would have no negative impacts on these natural features or their ecological functions.
3. Policy 4.2.1 e) states that planning authorities shall implement necessary development and site alternation restrictions (1) to protect drinking water supplies and designated vulnerable areas and (2) to protect, improve or restore sensitive surface and ground water features, and their hydrologic functions.
4. Policy 4.2.2 provides that development and site alteration are to be restricted in or near sensitive surface water features and sensitive ground water features, such that these features and their related hydrologic functions will be protected, improved or restored. It is further stated in this Policy that mitigative measures and/or alternative development approaches may be required in order to protect, improve or restore sensitive features and their hydrologic functions.
5. Policy 4.6.2 directs that planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential, unless the significant archaeological resources have been conserved.

Policy Analysis

Respecting Policies 4.1.1 and 4.1.8, the Environmental Impact Study prepared by NRSI documents existing natural heritage features and functions within the study area, considers potential impacts resulting from the proposed development, and provides recommendations for mitigation measures to minimize potential impacts and enhance ecological features and functions. Development limits to protect natural heritage features and functions have been incorporated into the Draft Plan as recommended by NRSI.

Regarding Policies 4.2.1 e) and 4.2.2, a hydrogeological investigation has been completed by Stonecairn in support of the Draft Plan application and to satisfy the direction of the identified Policies. Findings and recommendations in relation to hydrogeological considerations are detailed in the associated study report, which is included with the Draft Plan application.

Chapter 5: Protecting Public Health and Safety

In our opinion, the policies of Chapter 5 set out below are relevant to this Draft Plan and serve to protect public health and safety:

1. Policy 5.1.1 prescribes that development is to be directed from areas where there is an unacceptable risk (1) to public health or safety or (2) of property damage, and that development is not to create new hazards or aggravate existing hazards.
2. Policy 5.2.2 generally directs development to areas outside of hazardous lands adjacent to river, stream and small inland lake systems impacted by flooding and/or erosion hazards, and to areas outside of hazardous sites; and
3. Policy 5.2.3 d) prescribes that development and site alteration are not to be permitted within a floodway regardless of whether the area of inundation contains high points not subject to flooding.

Policy Analysis

A Geomorphic Assessment, Flood Line Delineation Study, and Hydrogeological Assessment were prepared to determine the erosion hazard limit and post-development flood limit associated with the Subject Lands. The proposed development limits have been established based on a combination of studies to delineate the existing Natural Heritage Features, Natural Hazards, updated Floodlines, crossing requirements, and appropriate buffers and compensation blocks to protect the features and hazards. Accordingly, with implementation of mitigation measures recommended in these studies, in our opinion the Draft Plan satisfies the referenced policies of Chapter 5.

Conclusion

In light of these considerations and our broader evaluation of this proposal relative to the policies of the PPS, it is our opinion that the Applications and provided development are consistent with this land use planning policy document.

5.3 Official Plan

5.3.1 Framework

Policy 4.6 of the PPS states that Official Plans are the most important vehicle for implementation of the Provincial Policy Statement. It is further stated that Official Plans shall identify provincial interests and set out appropriate land use designations and policies. Accordingly, this proposal has been assessed relative to the applicable policies set out by the City of London Official Plan framework.

5.3.2 The London Plan

The City of London Council adopted a new Official Plan on June 23, 2016 and the Ministry of Municipal Affairs and Housing (MMAH) issued its approval of The London Plan, with modifications, on December 30, 2016. Through OLT decision May 25, 2022, the final phase of policy appeals were resolved, although several site-specific appeals remain.

The following mapping and Official Plan Designations apply to the site:

Table 4: Applicable Official Plan Designations

Title	Designation	Report Figure
Map 1: Place Type	Light Industrial, Green Space	Please refer to Figure 5
Map 3: Street Classifications	Commissioners Road East – Civic Boulevard Veterans Memorial Parkway - Expressway	Please refer to Figure 6
Map 4: Active Mobility Network	Cycling and Walking Route	Please refer to Figure 7
Map 5: Natural Heritage	Water Body, Potential ESA (Meadow Lily Woods ESA), Significant Valley Lands, Water Courses, Ponds	
Map 6: Hazards and Natural Resources	Conservation Authority Limit, Significant Groundwater Recharge Areas, Highly Vulnerable Aquifers	Please refer to Figure 8
Map 7: Specific Policy Areas	Specific Policy Area 42 – Airport Road South Innovation Park	Please refer to Figure 9

The proposed Official Plan Amendment would revise Maps 1, 3, 4, and 5 of The London Plan to be consistent with the proposed Draft Plan and development limits identified in the report summaries. Specifically, Map 1 would be amended to align the 'Industrial' and 'Green Space' place types with the proposed zoning and Draft Plan of Subdivision, Map 3 would be amended to designate Street A as a 'Neighbourhood Connector', Map 4 would be amended to identify the proposed pathway through the subject lands, and Map 5 would be amended to reflect the boundaries of the natural heritage features and compensation areas.

Policy Overview

Considering these applicable designations and the scope of this proposal, the Our Strategy, Our City, City Building, Place Type Policies and Secondary Plans sections of The London Plan contain policies applicable to the development and open space components of this project.

The following discussion summarizes the core policies of The London Plan respecting this proposal and evaluates the merits of this project relative to this policy framework.

Our Strategy

Policies: The Our Strategy section of The London Plan contains a series of policies that address the core values, vision, and key directions of the Plan to help guide planning and city building activities. The core values of the Official Plan are set out in Policy 52 and include a number of themes relating to development proposals (e.g., be collaborative, be innovative, think sustainable). Further, Policy 53 defines the vision for The London Plan to provide a focus for planning decisions: "London 2035: Exciting, Exceptional, Connected".

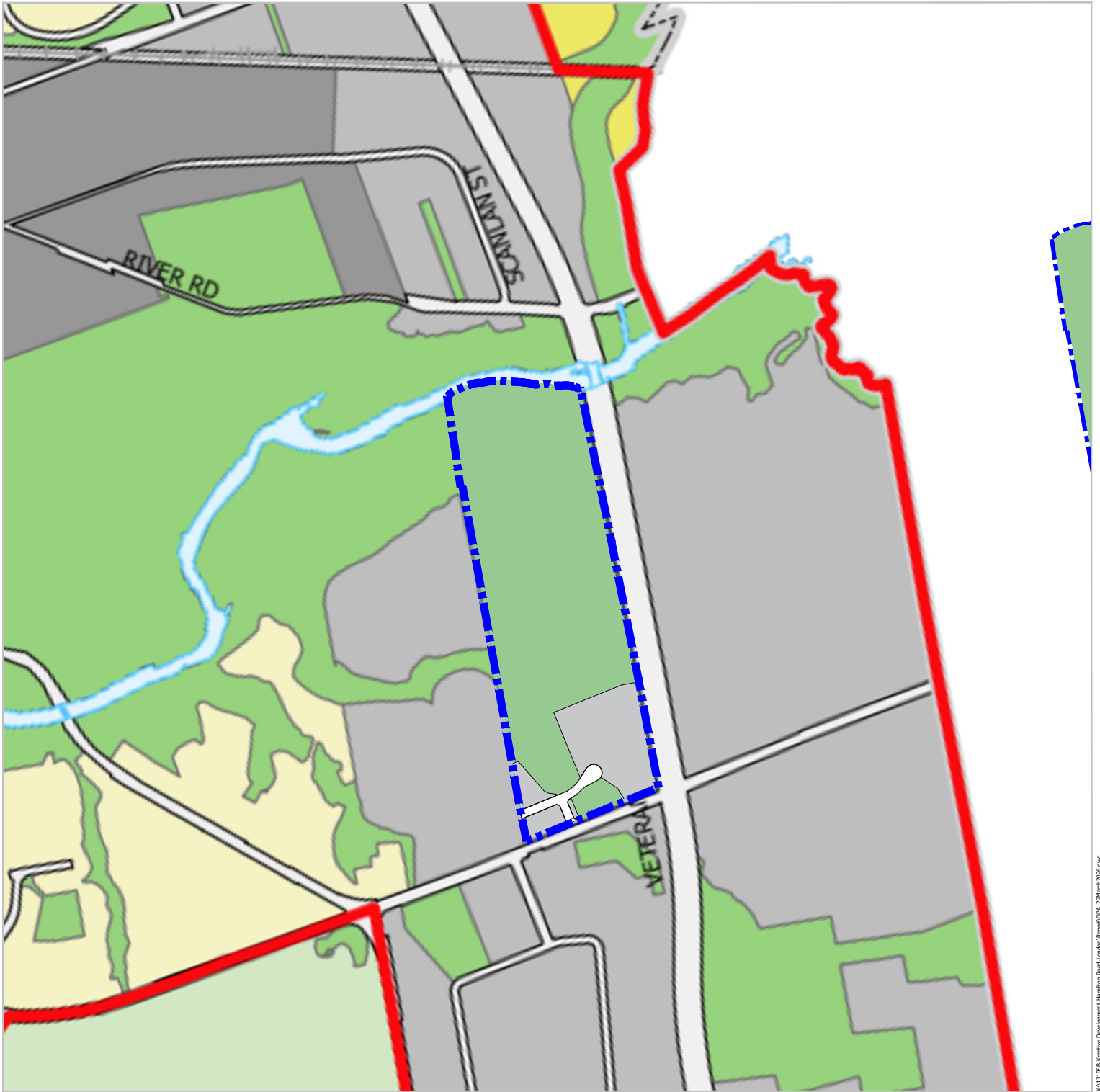


Figure 5: Official Plan Amendment to The London Plan Map 1 - Place Type



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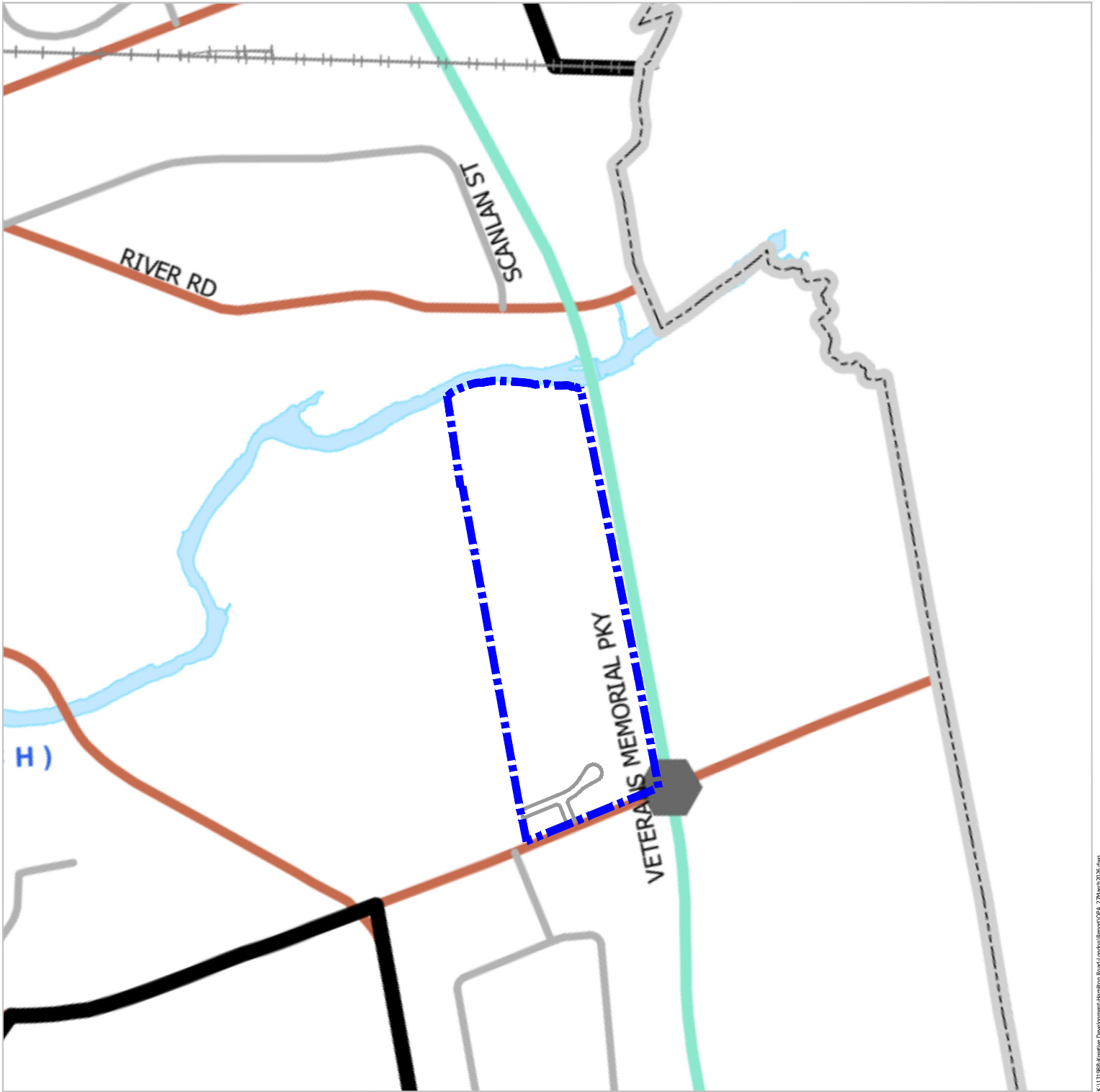


Figure 6: Official Plan Amendment to The London Plan Map 3 - Street Classifications

- | | |
|--|---|
|  Subject Lands |  Railways |
|  Expressway |  Urban Growth Boundary |
|  Civic Boulevard |  Water Courses/Ponds |
|  Neighbourhood Connector | |
|  Interchanges | |



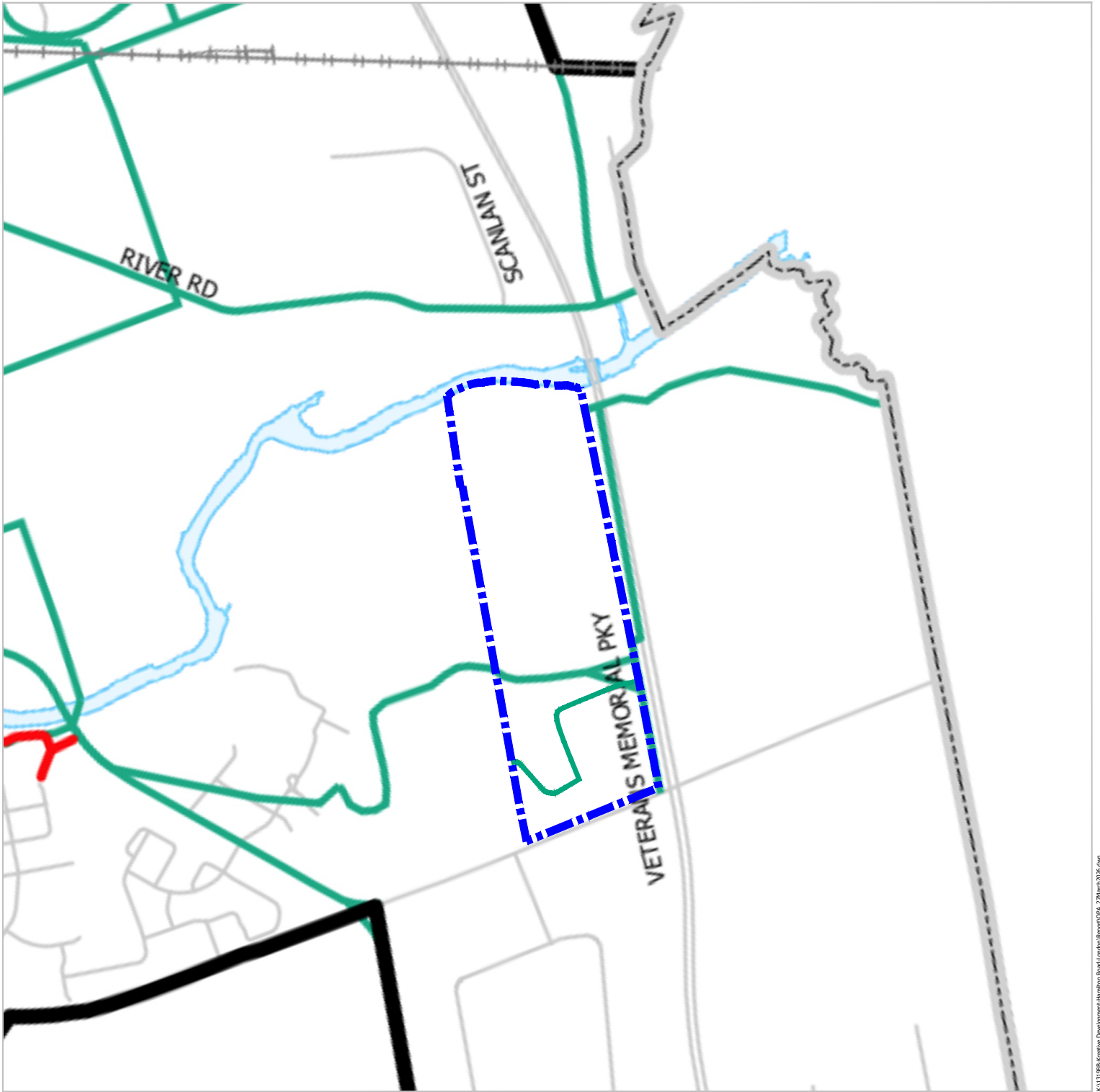


Figure 7: Official Plan Amendment to The London Plan Map 4 - Active Mobility Network

- Subject Lands
- Water Courses/Ponds
- Thames Valley Parkway
- Cycling and Walking Routes
- Railways
- Urban Growth Boundary



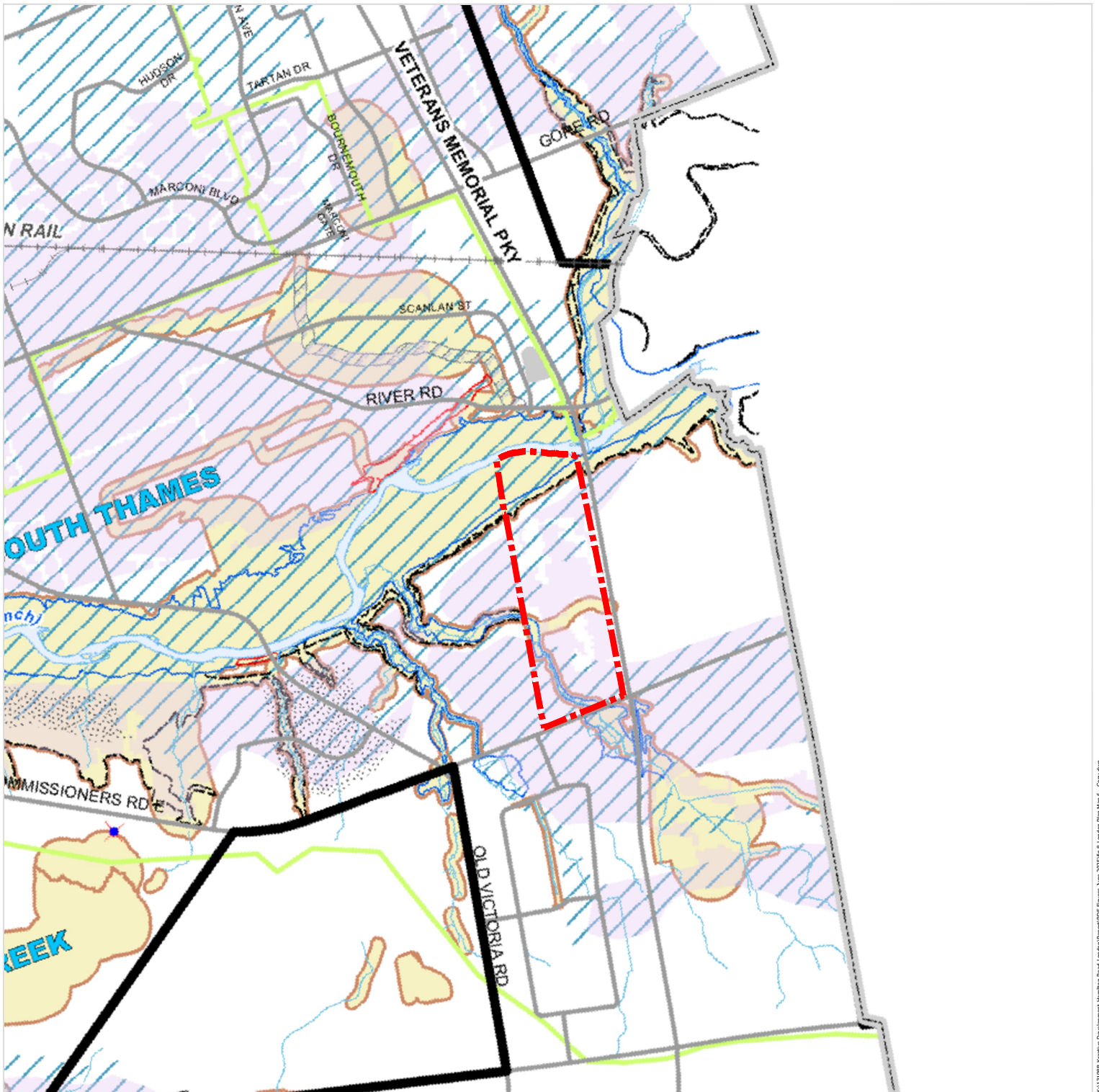


Figure 8: The London Plan Map 6 - Hazards and Natural Resources



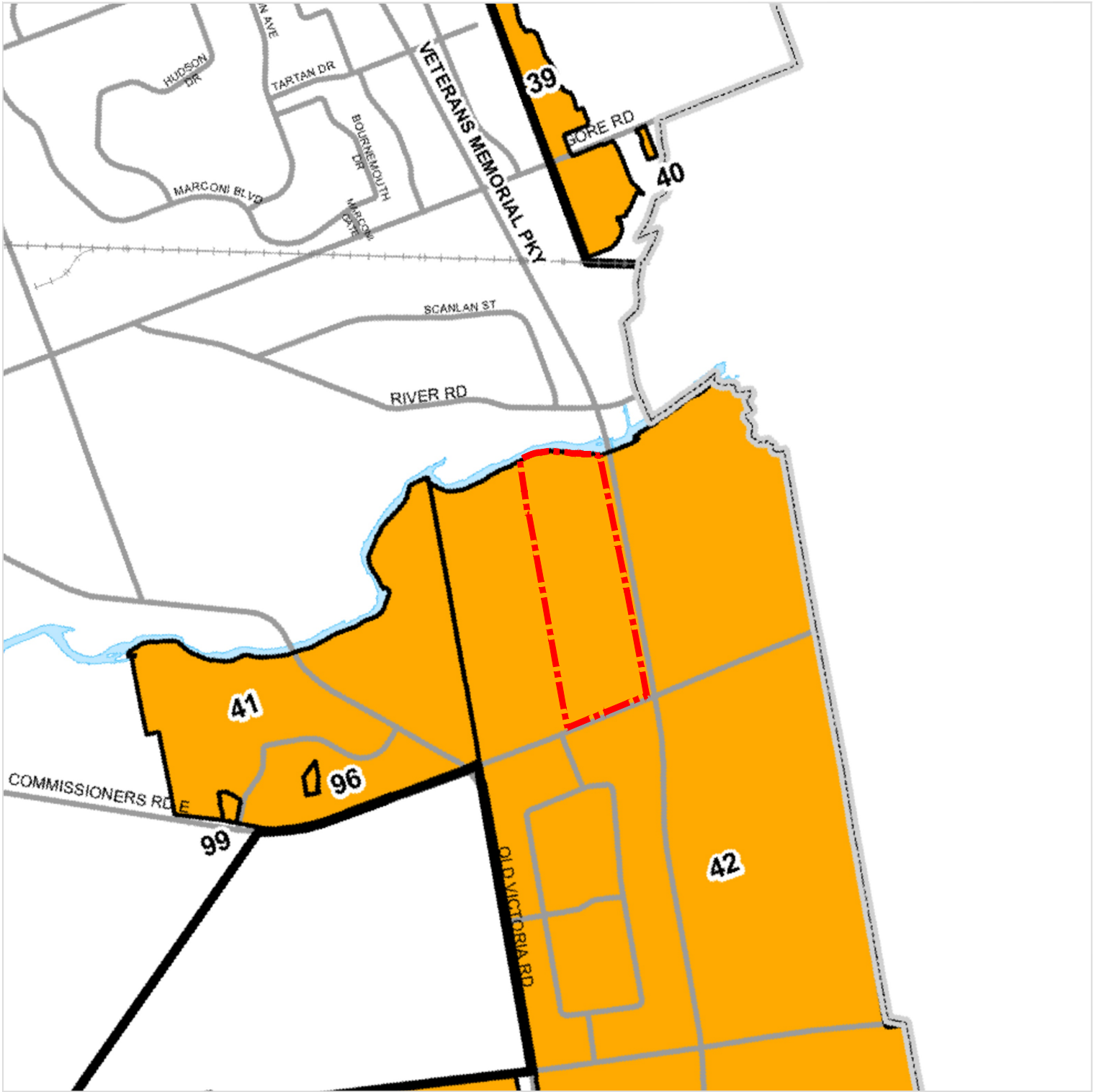


Figure 9: The London Plan Map 7 - Specific Policy Areas

-  Subject Lands
-  Specific Policies
-  Rapid Transit and Urban Corridor Specific-Segment Policies
-  Near Campus Neighbourhood
-  Secondary Plans

BASE MAP FEATURES

-  Streets (See Map 3)
-  Railways
-  Urban Growth Boundary
-  Water Courses/Ponds



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Policies 54 to 63 define the eight key directions to help achieve this broad vision and to guide planning development to the year 2035 (being The London Plan's 20-year planning horizon). In our opinion, the following key directions and associated planning strategies have particular relevance to this Draft Plan proposal:

55_ Direction #1 Plan strategically for a prosperous city

1. Plan for and promote strong and consistent growth and a vibrant business environment that offers a wide range of economic opportunities.
5. Invest in an infrastructure system that is sustainable, reliable, secure, affordable, and in compliance with regulatory criteria.
9. Identify and strategically support existing and emerging industrial sectors.
10. Ensure an adequate supply of employment lands.
11. Plan for cost-efficient growth patterns that use our financial resources wisely.

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

3. Protect and enhance our Thames Valley corridor and its ecosystem.
4. Protect and enhance the health of our Natural Heritage System.
5. Manage growth in ways that support green and active forms of mobility.
11. Implement green infrastructure and low impact development strategies.

62_ Direction #8 Make wise planning decisions

1. Ensure that all planning decisions and municipal projects conform with The London Plan and are consistent with the Provincial Policy Statement.
2. Plan for sustainability – balance economic, environmental, and social considerations in all planning decisions.
6. Plan for an affordable, sustainable system of infrastructure that will support the implementation of this Plan.
8. Avoid current and future land use conflicts – mitigate conflicts where they cannot be avoided.
9. Ensure new development is a good fit within the context of an existing neighbourhood.”

Analysis

It is our opinion that the Applications support the key directions set out in the referenced policies, as the development would:

- Promote cost-effective development that efficiently utilizes existing and new servicing infrastructure to accommodate projected needs;
- Integrate a compact and contiguous growth pattern;
- Broaden available employment opportunities within the City;

- Protect and enhance the City's Natural Heritage System by locating development outside the limits of identified features and implementing the recommendations of technical studies to protect natural heritage features and functions;
- Incorporate a land use pattern that is in keeping with Provincial and City planning policies; is compatible with the existing development context; and should not generate adverse land use impacts; and,
- Evaluate sustainable development features in conjunction with the detailed design phase of the subdivision approval process, including BMPs and LID technologies.

Our City

Policies: The Our City part of The London Plan contains policies and schedules relating to the City Structure Plan that, in our opinion, have particular relevance to the proposed Draft Plan.

Policy 69 of the Official Plan states that the City Structure Plan establishes a framework for London's growth for the 20-year planning horizon and informs other policies of the Plan. Policy 70 further prescribes that, "All of the planning we do will be in conformity with the City Structure Plan ... Planning and development applications will only be approved if they conform with the City Structure Plan."

Policy 69 also identifies that the City Structure Plan is set out in five associated frameworks: growth, green, mobility, economic, and community. Policies 71 to 146 provide policy direction relating to each of these frameworks.

In our opinion, the development proposal is in keeping with the City Structure Plan and has regard for the policies and/or schedules relating to the five frameworks. Most notably, the plan addresses the Urban Growth Boundary (Figure 1), the Street Network (Figure 3), and subwatershed planning (Policy 115).

Policies: Additionally, Our City policies detail the City's strategy for growth servicing and financing (Policies 166 to 183). The principal objective of these policies is described in Policy 166, "The city's structure could not operate successfully without sustainable, secure, reliable, and affordable infrastructure". Further, Policy 168 states that municipal services will be planned on a long-term basis to support the City Structure Plan.

In our opinion, the following policies of this section are also pertinent to this proposal:

"172_ The City shall be satisfied that adequate municipal infrastructure services can be supplied prior to any development or intensification proceeding

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

177_ A fundamental principle that will be followed for growth financing is that growth will pay for growth, meaning that growth-related capital costs will be recovered from revenues generated from new development."

Analysis

Sections 3.3 and 6 of this Report address the servicing and financial strategy associated with the proposed Draft Plan. In our opinion, the details provided in these Sections illustrate that the servicing and financial arrangement being developed for this project would support the intent, and components, of the aforementioned policies.

City Building

City Design Policies

Policies: Within the City Building Section of the Official Plan, the City Design chapter provides a series of urban design policies. Policies 189 to 306 define the City Design policies that are intended to guide the character and form of development.

The overarching objectives of these policies are outlined in Policy 193:

"In all of the planning and development we do and the initiatives we take as a municipality we will design for and foster:

1. A well-designed built form throughout the city.
2. Development that is designed to be a good fit and compatible within its context.
3. A high-quality, distinctive and memorable city image.
4. Development that supports a positive pedestrian environment.
5. A built form that is supportive of all types of active mobility and universal accessibility.
6. High-quality public spaces that are safe, accessible, attractive and vibrant.
7. A mix of housing types to support ageing in place and affordability.
8. Sustainably designed development that is resilient to long-term change.
9. Healthy, diverse and vibrant neighbourhoods that promote a sense of place and character."

Analysis

In our opinion, the Draft Plan presented in this Report demonstrates that the proposed development has been designed to achieve these broad objectives. The development is compatible with other planned and/or existing employment/commercial uses in the area and appropriately utilizes its frontage along Hamilton Road by locating multiple blocks that will allow buildings to address and frame the street.

Place Type Policies

As stated in Table 4, the subject lands are within the Light Industrial and Green Space place types.

Light Industrial Place Type

Vision and Objectives:

Map 1: Place Type as designated the south part of the site as Light Industrial. Policy 1110 sets out an overall vision for development in the Light Industrial place type: “the Light Industrial Place Type is where industries generating more minimal planning impacts will be permitted.”

Multiple principal elements for Industrial Place Types are defined in Policy 1113 to help achieve the vision statement, including:

1. “Separate heavy and light industrial uses to avoid land use conflicts.
3. Promote a broad industrial land base in the City of London through the provision of a wide choice of locations, lot sizes, services, and streets and rail access in order to accommodate a wide range of target industrial sectors and industrial uses.
6. Design and develop industrial parks that have strong amenities for employees and attractive settings for industrial development.
10. Beautify the Veterans Memorial Parkway, creating a strong linkage of industrial opportunity between the airport and Highway 401.
11. Create strong north-south connections on the eastern and western extremities of our city.”

Analysis

In our opinion, the Draft Plan integrates several components to support the broad vision of the Light Industrial place type and the related objectives of Policy 1110. Most notably:

- The land use pattern is intended to allow for a mix of uses permitted within the light industrial zone;
- The development plan includes a large employment block that provides flexibility to suit future users and their needs; and,
- The road design is intended to align with Venture Gate to the south, provide a connection to the lands to the west and allow for an access to Hamilton Road in compliance with the required separation distance from the intersection of Hamilton Road and Veterans Memorial Parkway.

Use, Form and Intensity:

Policy 1115 outlines the permitted uses in the Light Industrial Place Type. These uses include 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. Additionally, policy 1115 provides the following direction regarding permitted uses in the Light Industrial Place Type:

- Industrial uses with large amount of outdoor storage may not be permitted;
- Warehouses, small-scale service office uses, service trades and contractors shops, automotive body shops, small-scale retail and service uses, and outdoor patios in association with draft brewery and artisan workshop establishments may be permitted;

- Automobile service stations or gas bars may be permitted if they are located on a Civic Boulevard;
- Accessory office uses of any scale will be permitted;
- General offices will not be permitted; and,
- The Province's D-series Guidelines will be implemented to ensure that industrial uses and sensitive land uses are not located inappropriately close to one another.

Policy 1125_4 states: "Industrial sites along the Veterans Memorial Parkway will be developed with high-quality design and enhanced landscaping with an abundance of tree planting to contribute to the iconic parkway image as a monument to Canada's war veterans." Policy 1125_5 requires large open storage areas to be screen with fencing and landscaping.

Analysis

The Draft Plan has been designed to permit the land uses contemplated in the Official Plan, and the proposed zoning by-law amendment includes site-specific regulation that require a landscaping strip along Veterans Memorial Parkway and screening of outdoor storage areas.

The Compatibility between Industrial Facilities and Sensitive Land Use guidelines, known as the D-6 Guidelines, ("Guidelines") are a provincial document intended to minimize nuisance by preventing the encroachment of sensitive land uses (i.e. residential) on industrial lands and vice versa. The Guidelines categorize industry into Class I, II, or III based on operations, emissions, and size, with each classification having a recommended minimum separation distance and an area of influence.

Class I industries are light industrial and are defined as "A place or business for a small scale, self-contained plant or building which produces/stores a product which is contained in a package and has low probability of fugitive emissions. Outputs are infrequent, and could be point source or fugitive emissions for any of the following: noise, odour, dust and/or vibration. There are daytime operations only, with infrequent movement of products and/or heavy trucks and no outside storage."

Class II industries are medium industrial and are defined as "A place of business for medium scale processing and manufacturing with outdoor storage of wastes or materials (i.e. it has an open process) and/or there are periodic outputs of minor annoyance. There are occasional outputs of either point source or fugitive emissions for any of the following: noise, odour, dust and/or vibration, and low probability of fugitive emissions. Shift operations are permitted and there is frequent movement of products and/or heavy trucks during daytime hours."

Class III industries create the most nuisance and are defined as "A place of business for large scale manufacturing or processing, characterized by: large physical size, outside storage of raw and finished products, large production volumes and continuous movement of products and employees during daily shift operations. It has frequent outputs of major annoyance and there is high probability of fugitive emissions."

Class I industries have a recommended minimum separation distance of 20 metres and a potential influence area of 70 metres. Class II industries have recommended minimum separation distance of 70 metres and an influence area of 300 metres, and Class III industries have a recommended minimum separation distance of 300 metres and an influence area of 1,000 metres.

The proposed Zoning By-law Amendment would rezone the developable portion of the subject lands from Urban Reserve (UR6) to the Light Industrial (LI1/LI4/LI5) zone to implement the Light Industrial place type.

The City of London has three industrial zones: Light Industrial (LI), General Industrial (GI), and Heavy Industrial (HI), which implement the Light Industrial and Heavy Industrial place types of The London Plan. Generally, the uses permitted in the Light Industrial place type and zone permit Class I industries such as bakeries, business service establishments, printing and data processing industries, wholesale operations, craft breweries, and restricted automotive uses. Manufacturing and assembly industries are permitted in the LI zone, which the Zoning By-law defines as: "... a building or part thereof used for a broad range of manufacturing, fabricating and assembly industries, including processing ancillary to the permitted manufacturing and assembly uses and includes household waste recycling depots, but excludes paper and allied products industries, food, tobacco and beverage processing, processed goods industries, raw materials processing industries, primary metals industries, waste treatment industries, armaments, munitions and explosive manufacturing industries, and any obnoxious use." The definition excludes obnoxious uses and specific industries with significant land use compatibility concerns, aligning manufacturing and assembly industries with Class I or Class II industries in the Guidelines.

As such, the majority of uses permitted in the proposed LI1/LI4/LI5 zone are Class I industries which have a recommended minimum separation distance of 20 metres, while some uses (manufacturing and assembly) could be Class II industries with a recommended minimum separation distance of 70 metres.

There are several single detached dwellings proximate to the subject lands, all of which are zoned for redevelopment (all are zoned Urban Reserve). In each case, the dwellings are surrounded by existing non-residential uses, including horse stables and sod production (on the same lands as the dwelling), light industrial uses along Venture Gate and Innovation Drive, or agricultural uses. Dwellings located on 1918 Hamilton Road, adjacent to the subject lands to the west, and 1939 and 1943 Hamilton Road, on the south side of Hamilton Road, are approximately 50 metres from the western and southern boundaries of the subject lands, respectively. Dwellings located on 2035 Hamilton Road and 2047 Hamilton Road are a minimum of 175 metres from the southeast boundary of the subject lands and are located on the east side of the Veterans Memorial Parkway right-of-way.

The proposed development addresses the Guidelines as:

- Most of the uses permitted within the LI1/LI4/LI5 zone are Class I industries. Each of the dwellings proximate to the subject lands is beyond the recommended minimum separation distance of 20 metres for Class I industries.
- The three dwellings on the west side of Veterans Memorial Parkway are within the 70-metre minimum separation distance of a Class II industry. To ensure that any future manufacturing and assembly use is assessed related to the sensitive uses within proximity to the subject lands, a Holding provision is proposed that will require a Land Use Compatibility Study prior to the development.
- The residential dwellings are zoned for redevelopment and surrounded by existing non-residential uses, the proposed light industrial use is appropriate for the subject lands.

- Any specific land compatibility uses can be addressed through site plan approval, where matters such as landscaping and fencing will be addressed.
- Environmental Compliance Approval permits are required for certain activities with air, noise, or vibration emissions and can further address land use compatibility concerns.

As such, the proposed Light Industrial zone implements the Light Industrial place type and meet the intent of the D-6 Series Guidelines regarding land use compatibility between sensitive land uses and industrial uses.

Green Space Place Type

Map 1: Place Type identifies the north part of the site as a Green Space Designation. Policy 762 generally prescribes that lands in the Green Space place type can be utilized for passive/active recreational uses, community facilities, private green space, agricultural, woodlot management, conservation and stormwater management (depending on the natural heritage features contained on the lands and potential hazards).

Analysis

The Environmental Impact Study confirmed the extent of the natural features and included recommendations regarding the development and required mitigation measures. It is anticipated that intended uses of the natural corridor would align with Policy 762 (e.g., conservation, stormwater management, passive/active recreational space).

The proposed Official Plan Amendment would align the Green Space place type on Map 1 with the conclusions of the Environmental Impact Study.

Light Industrial – Innovation Parks Specific Policies

Map 7: Specific Policy Areas identifies the site as being located in Special Policy Area 42 which relates to the Airport Road South Innovation Park. The London Plan polices 1141 through 1149 provide specific policy to direct development in the Airport Road South Innovation Park. A summary of these policies are as follows:

- "1142_ It is expected that these lands will develop as a high-quality, well-designed prestige innovation park, including an appropriate mix of light industrial, research and development, and high-tech uses. The park will have a high standard of building and site design that is sensitive to the natural environment and promotes economic growth and energy efficiency for the city. The review of planning and development applications will have regard for the Airport Road South Business Park Urban Design Guidelines.
- 1143_ Areas adjacent to Highway 401 and Veterans Memorial Parkway (formerly Airport Road) have convenient access as well as a high degree of visibility for major entryways to the City. These areas are intended for a high standard of light industrial development and promoted and designed to also attract research and high tech industries. This gateway corridor will develop in accordance with the subdivision and site design guidelines and function as a prestige business park.

- 1144_ Lands in the Light Industrial Place Type will also accommodate the traditional light manufacturing and warehousing types of uses; however, consideration will be given to how these uses can be clustered within the overall development scheme to ensure that they are functionally and visually compatible with the desired character of the innovation park and do not undermine the ability of this park to attract prestige industrial and technology-related uses over the long term. The park will be designed to offer a high level of amenity for employees, including comfortable walking environments for physical activity and for easy access to amenity areas incorporated into development of individual sites and the overall park. Some limited commercial development may be permitted on portions of Bradley Avenue and Hamilton Road to provide the opportunity for business services to locate in close proximity to the various industries and employers in the business park.
- 1145_ Within the Airport Road South Innovation Park, lands in the Light Industrial Place Type, north and east of Hamilton Road and west of Veterans Memorial Parkway are expected to develop as a prestige of business park area with a high standard of building and site design that is sensitive to the natural environment and promotes economic growth and energy efficiency for the City of London.
- 1149_ Existing rural residential development will be protected from industrial development in accordance the Province's D-series Guidelines to ensure that industrial uses and existing and planned sensitive land uses are not located inappropriately close to one another."

Analysis

The proposed development conforms to the Special Policy Area. The Applications implement The London Plan's vision for the subject lands to develop as a light industrial subdivision with a high standard of urban design, which will be ensured through site-specific zoning provisions (i.e. enhanced landscaping along Veterans Memorial Parkway) and through future site plan approval applications. The subdivision proposes a variety of block sizes, providing the opportunity to accommodate a variety of uses along Hamilton Road and clustering potential light manufacturing and/or warehousing uses on the east side of the subdivision.

The subdivision incorporates recommendations from various technical studies to ensure the proposed development does not negatively impact the natural environment and respects natural hazards.

As discussed, the proposed development adequately protects existing interim residential uses from industrial use.

Environmental Policies

Map 5: Natural Heritage identifies that a water body, Meadow Lily Woods ESA, Significant Valley Lands, Water Courses and Ponds are located on the site.

Map 6: Hazards and Natural Resources identify that the subject lands are within a Conservation Authority Limit, Significant Groundwater Recharge Area and a Highly Vulnerable Aquifer.

Policy 1308 states that the policies of this place ensure that London's Natural Heritage System is protected, conserved, enhanced and managed through various strategies which include the identification and protection of wetlands, groundwater recharge areas and headwater streams. Policy

1309 speaks to requirements for an Environmental Impact Study (EIS) to confirm provide long term protection of these natural heritage systems.

Analysis

A Subject Lands Status Report and Environmental Impact Study have been prepared in support of the Applications. These documents are summarized in Section 2.2 and 4.1 of this Report, respectively. The EIS identified all natural heritage features on the site and recommended buffers, all of which are incorporated into the proposed draft plan. The EIS concludes that the proposed development can proceed without negatively impacting natural heritage features provided the recommended mitigation measures are implemented.

Our Tools

Policy 1716 lists urban design guidelines, which includes the Airport Road South Business Park Urban Design Guidelines (2004). The guidelines have been provided to create a district and strong sense of place and to encourage a high quality of building and site design throughout the Airport Road South Business Park.

Section 3.1.1 provides guidelines for street design. Section 3.1.1.1 states that new streets in business parks should follow the approved street sections, which are 20-metre-wide rights-of-way with street trees and sidewalks. The proposed subdivision provides a 23-metre-wide right-of-way which incorporates sidewalks and provides ample room for street trees.

Section 3.2.1.1 requires final width of buffers from natural heritage areas to be determined through an Environmental Impact Study. NRSI prepared an Environmental Impact Study and the recommended buffers have been incorporated into the Draft Plan.

Section 3.4.1 states that pedestrian routes should be provided throughout the business park on a system of sidewalks along public streets and off-road trails along the major collector road and along natural features. Sidewalks are included along Streets A and B, and a conceptual trail is identified through the subject lands (refer to Map 7C of the EIS).

Section 3.5.1 addresses stormwater management ponds, requiring such features to be integrated into trail systems and park areas where appropriate should be landscaped. In this case, stormwater is directed to the Feteke Drain and a pond is not proposed (refer to Section 3.3.4 of this Report for additional detail).

Section 4 provides policies for site development and Section 5 provides building and design policies, both of which will inform Site Plan Approval for each of the blocks. Landscaping along Veterans Memorial Parkway and screening of open storage areas are proposed to be incorporated into the site-specific zone for the subject lands (Section 4.5.1). Site design adjacent to the residential dwelling to the west will be developed in accordance with Section 6.5.1 (Guidelines for Development Next to Residential Areas).

It is our opinion that the proposed Applications have considered and provided a design consistent with Special Policy Area 42 – Airport Road South Innovation Park.

Conclusion

The Applications are consistent with The London Plan as described above. In summary:

- The proposed development implements light industrial development on the subject lands within the Urban Growth Boundary in accordance with the Light Industrial place type.
- The development will be municipally serviced.
- The proposed uses will be compatible with surrounding uses and will implement the Airport Road South Business Park Urban Design Guidelines.
- Natural heritage features and hazards have been evaluated and recommended buffers have been incorporated into the Draft Plan.
- The proposed Official Plan Amendment will align Maps 1, 3, 4, and 5 of The London Plan with the proposed Draft Plan and development limits identified in the report summaries (see **Figures 10 – 13**).

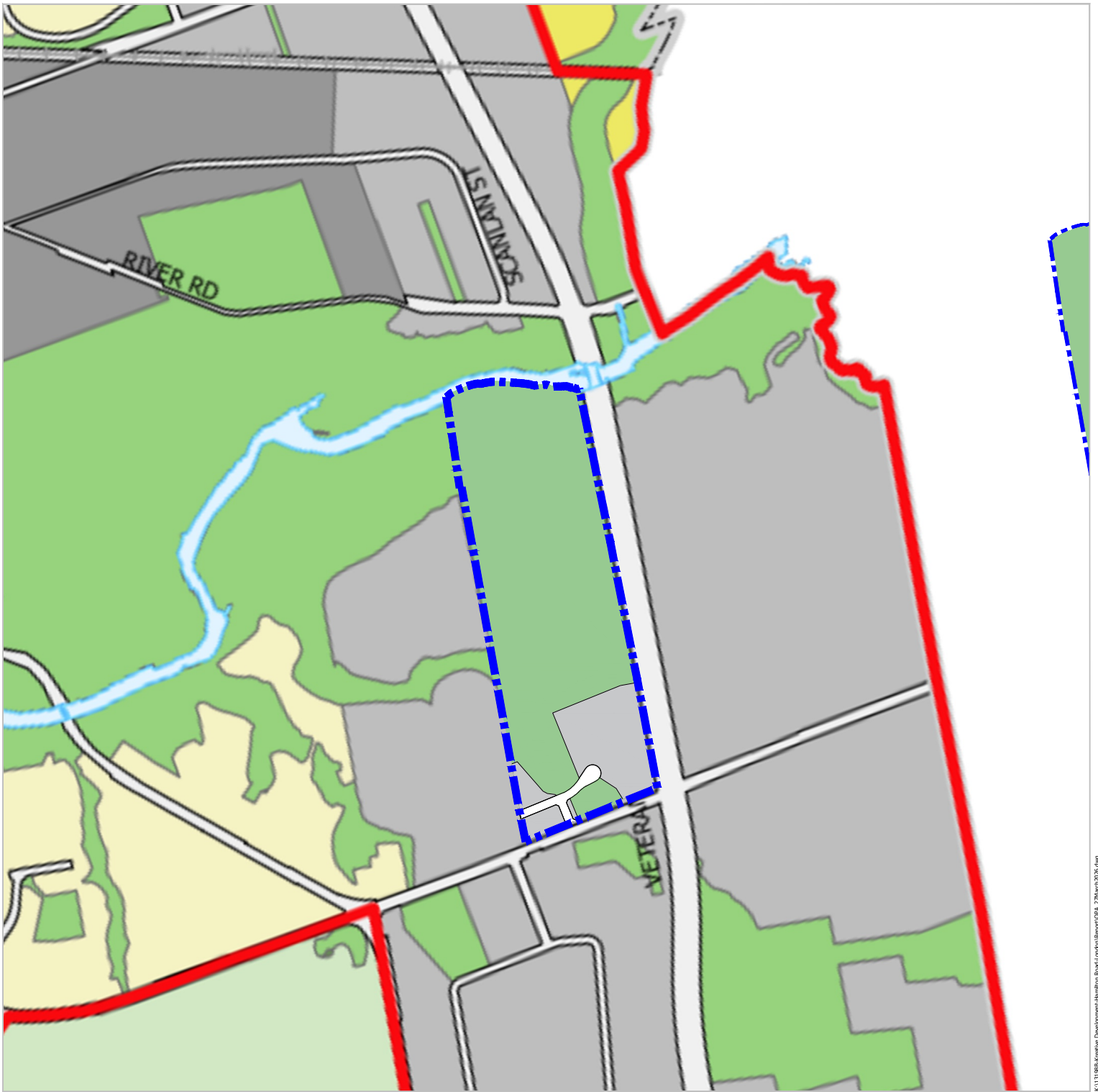


Figure 10: Official Plan Amendment to The London Plan Map 1 - Place Type



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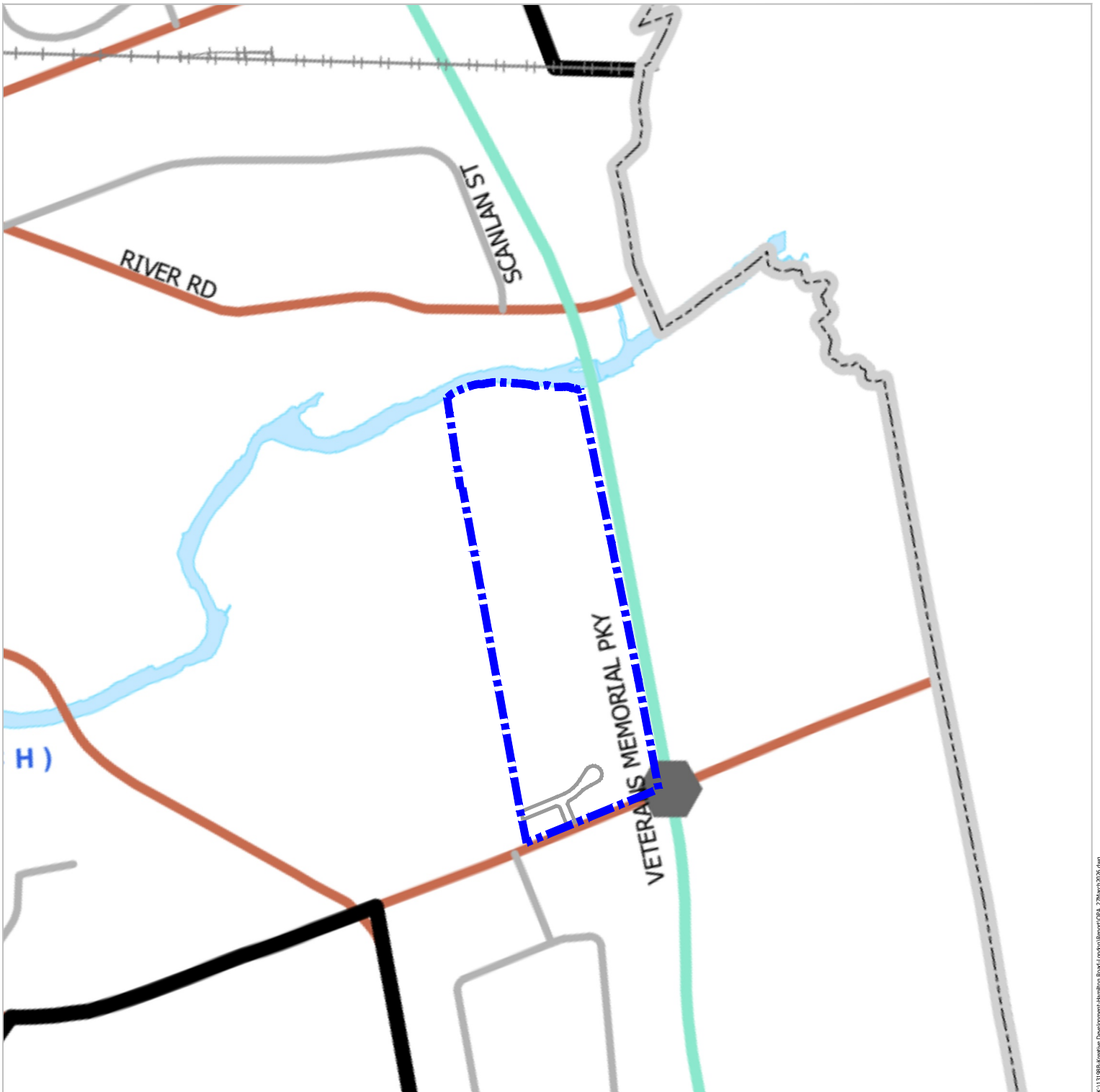


Figure 11: Official Plan Amendment to The London Plan Map 3 - Street Classifications

- | | |
|--|---|
|  Subject Lands |  Railways |
|  Expressway |  Urban Growth Boundary |
|  Civic Boulevard |  Water Courses/Ponds |
|  Neighbourhood Connector | |
|  Interchanges | |



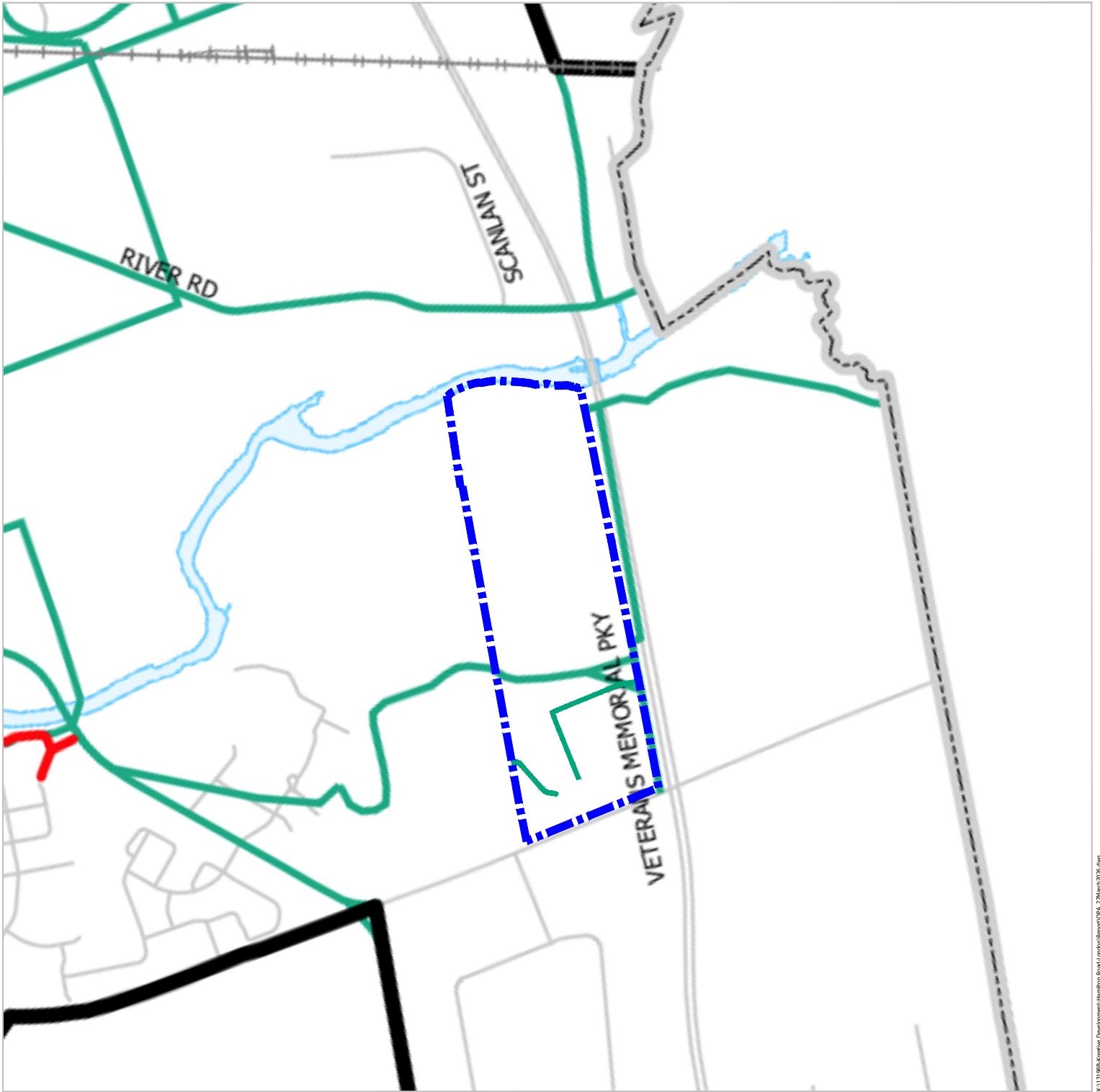


Figure 12: Official Plan Amendment to The London Plan Map 4 - Active Mobility Network

- Subject Lands
- Water Courses/Ponds
- Thames Valley Parkway
- Cycling and Walking Routes
- Railways
- Urban Growth Boundary



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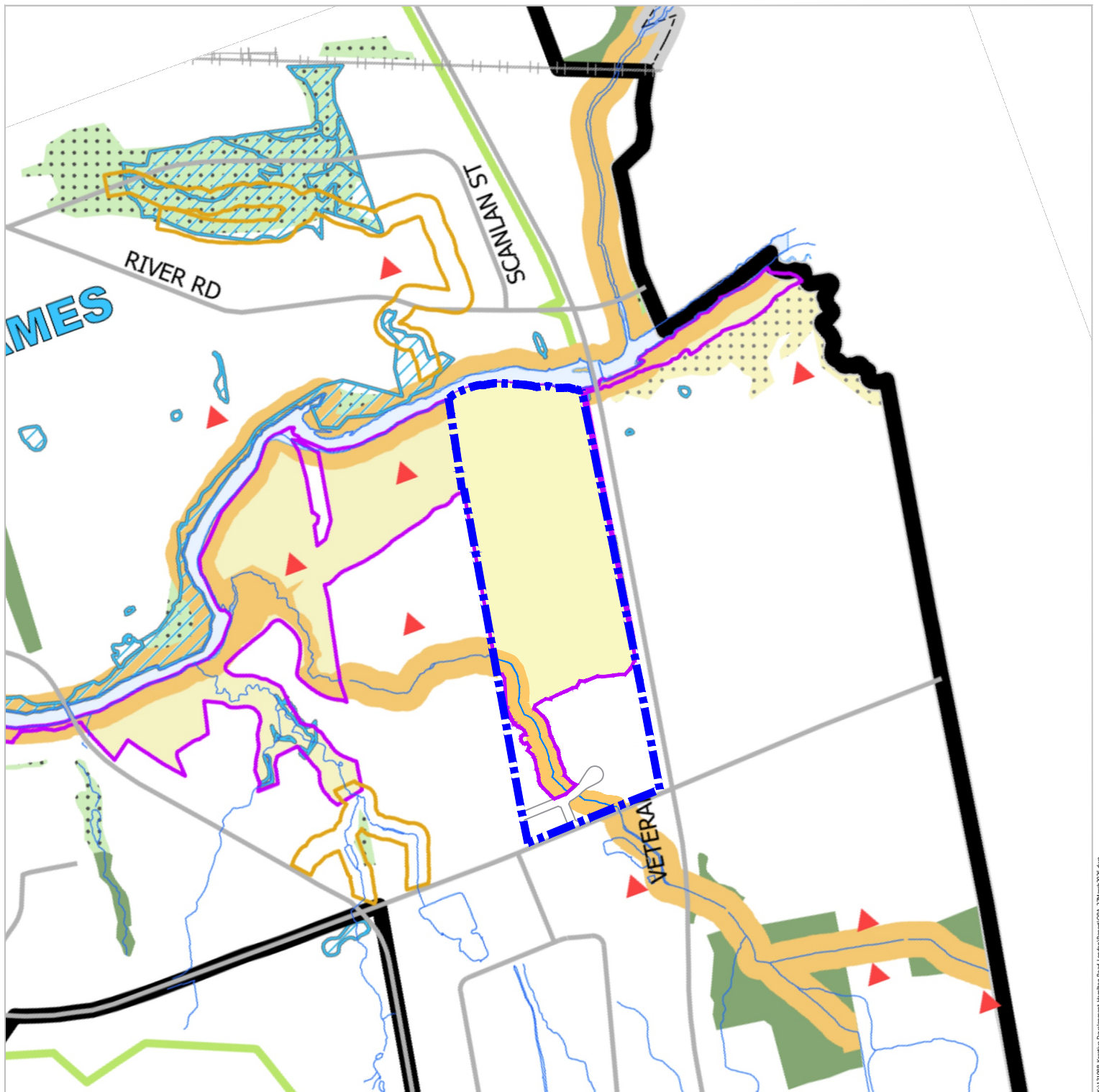
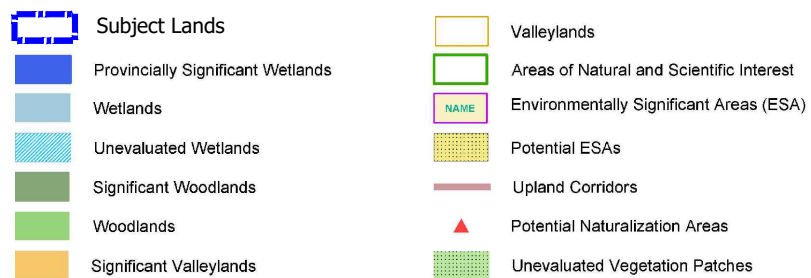


Figure 13: Official Plan Amendment to The London Plan Map 5 - Natural Heritage



5.4 Zoning By-law Z.-1

5.4.1 Existing Zoning

The subject lands currently incorporate three separate zones as defined in the City's Zoning By-law No. Z.-1 and itemized below (see **Figure 14**):

1. Urban Reserve (UR6) Zone, which is applied to majority of the Site;
2. Open Space (OS4) Zone, which is applied to the portion of the Site within the watercourse corridor; and,
3. Environmental Review (ER) Zone, which is applied to the portion of the subject lands adjacent to the Thames River and the woodlot.

The lands being considered for development are predominately zoned UR6. Section 49.1 of the Zoning By-law describes that the Urban Reserve Zone regulates existing uses on lands that are primarily undeveloped for urban uses. The By-law further states that the UR6 Zone is generally applied to areas where industrial development is anticipated over the long term.

Pursuant to Section 49.2, permitted uses in the UR6 Zone include:

- Existing dwellings;
- Agricultural uses;
- Conservation lands;
- Managed woodlots;
- Wayside pits;
- Passive recreation uses;
- Farm gate sales;
- Kennels;
- Private outdoor recreation clubs;
- Riding stables; and,
- Existing defined industrial uses.

Section 36.1 of the Zoning By-law states that the OS4 Zone is a restrictive open space zone variation applied to lands that have physical and/or environmental constraints to development. Permitted uses in the OS4 Zone are set out in Section 36.2 4) and are summarized below:

- Conservation lands;
- Conservation works;
- Golf courses without structures;

- Private parks without structures;
- Public parks without structures;
- Recreational golf courses without structures;
- Cultivation or use of land for agricultural/horticultural purposes; and
- Sports fields without structures.

Section 37.1 prescribes that the ER Zone is applied to lands that are intended to remain in a natural condition until their significance is determined through detailed environmental studies. Permitted uses in the ER Zone are set out in Section 37.2 and summarized below:

- Conservation lands;
- Conservation works;
- Passive recreation uses;
- Managed woodlots; and
- Agricultural uses.

5.4.2 Proposed Zoning

A Zoning By-law Amendment is proposed to rezone the subject lands to implement the Light Industrial place type and facilitate the proposed light industrial subdivision. The revised Zoning By-law Amendment also incorporates comments received from City staff during review of the first submission. The proposed Amendment would rezone the subject lands as follows (**Figure 15**):

- Blocks 1, 2, 3, 4, and 5: These development blocks are proposed to be zoned Light Industrial (LI1/LI4/LI5) as recommended by City staff during review of the Initial Proposal Report and first submission:
 - **Block 1:** A Special Provision LI1/LI4/LI5(a)) is proposed for Block 1. The following special provisions are proposed:
 - Retaining walls are not permitted along the public street frontage of Street A.
 - **Block 2:** A Special Provision and a holding provision (H-XXX*LI1/LI4/LI5(b)) are proposed for Block 2. The Holding provision would require a Land Use Compatibility Study for a 'manufacturing and assembly industries use' to ensure compatibility is assessed relative to sensitive uses in proximity prior to development. The following special provisions are also proposed:
 - Retaining walls are not permitted along the public street frontage of Street A or Hamilton Road;
 - The maximum setback from Hamilton Road is 25 metres; and,
 - Parking is not permitted between the building and Hamilton Road.

- **Block 3:** A Special Provision (LI1/LI4/LI5(b)) is proposed for Block 3 (note: this is the same special provision that applies to Block 2). The following special provisions are proposed:
 - Retaining walls are not permitted along the public street frontage of Street A or Hamilton Road;
 - The maximum setback from Hamilton Road is 25 metres;
 - Parking is not permitted between the building and Hamilton Road.
- **Block 4:** A Special Provision (LI1/LI4/LI5(c)) is proposed for Block 4. The following provisions are proposed:
 - Parking is not permitted between the building and Hamilton Road;
 - The maximum setback from Hamilton Road is 25 metres;
 - Retaining walls are not permitted along the public street frontage of Street A or Hamilton Road;
 - Where a loading space and/or open storage area is located in a yard adjacent to Veterans Memorial Parkway, lateral screening is required. Lateral screening shall be the full length of the loading space and open storage area and at least 3 metres in height above the finished grade to effectively conceal the view of these areas from Veterans Memorial Parkway. The lateral screening shall be compatible with the colour and materials of the main buildings.
 - A minimum 5-metre-wide landscape strip shall be located on the portions of any yard adjacent to the Veterans Memorial Parkway corridor.
- **Block 5:** A Special Provision (LI1/LI4/LI5(d)) is proposed for Block 5. The following provisions are proposed:
 - Retaining walls are not permitted along the public street frontage of Street A;
 - Where a loading space and/or open storage area is located in a yard adjacent to Veterans Memorial Parkway, lateral screening is required. Lateral screening shall be the full length of the loading space and open storage area and at least 3 metres in height above the finished grade to effectively conceal the view of these areas from Veterans Memorial Parkway. The lateral screening shall be compatible with the colour and materials of the main buildings.
 - A minimum 5-metre-wide landscape strip shall be located on the portions of any yard adjacent to the Veterans Memorial Parkway corridor.
- **Blocks 6 - 15:** These blocks include the natural heritage features, buffers, and compensation areas and are proposed to be zoned Open Space (OS5). The OS5 zone permits conservation and passive recreation including the proposed trail.

The LI1/LI4/LI5 variation permits the following permitted uses:

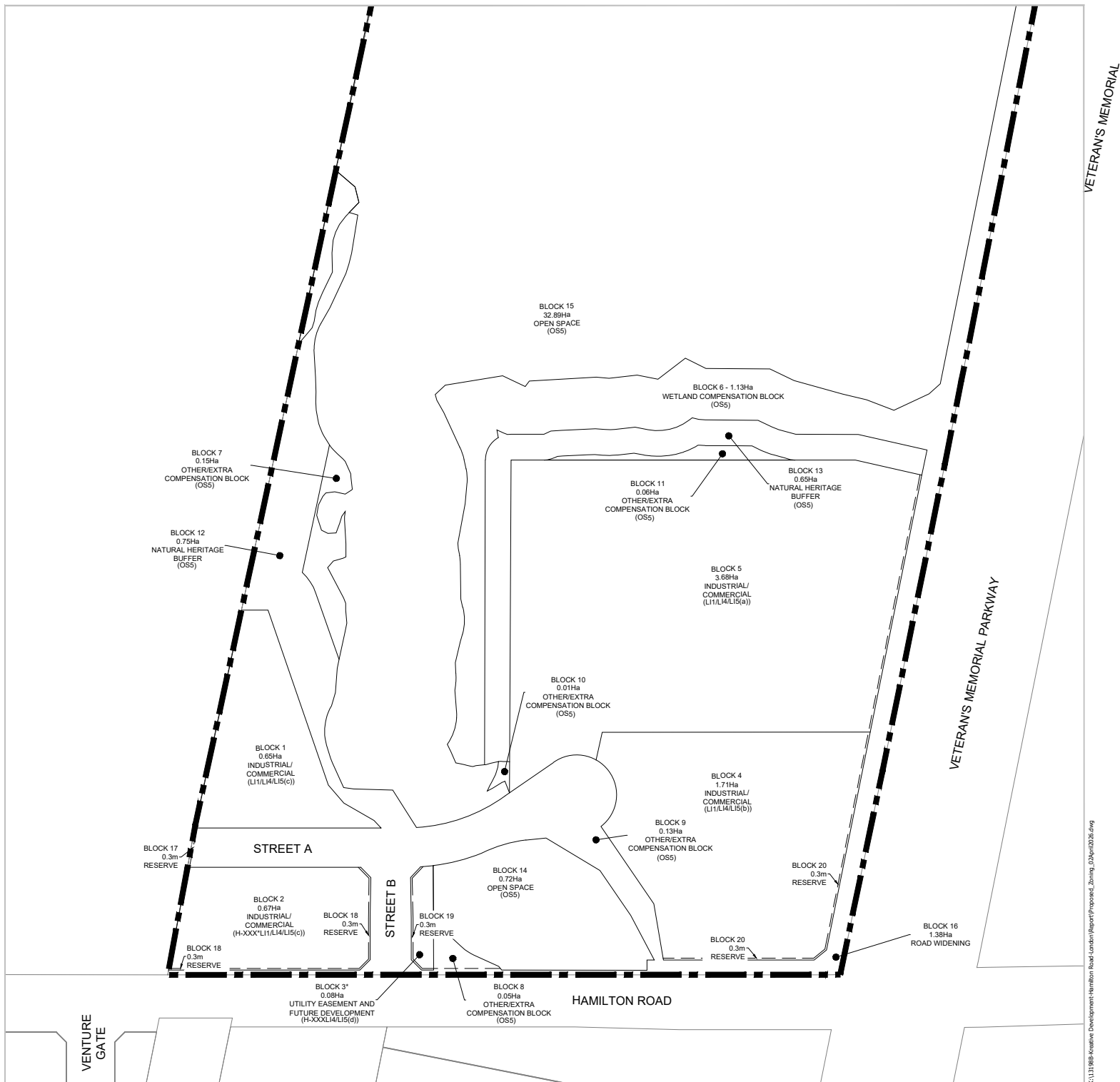
- Artisan workshop
- Automotive uses, restricted
- Bakeries
- Brewing on premises establishments
- Business service establishments
- Clinics
- Convenience service establishments
- Convenience stores
- Craft brewery
- Custom workshop
- Day care centres
- Existing self-storage establishments
- Financial institutions
- Hotels
- Laboratories
- Manufacturing and assembly industries
- Medical/dental offices
- Motels
- Offices support
- Paper and allied products industries excluding pulp and paper and asphalt roofing industries
- Personal service establishments
- Pharmaceutical and medical product industries
- Printing, reproduction and data processing industries
- Research and development establishments
- Restaurants
- Service trade
- Tow truck business
- Warehouse establishments

- Wholesale establishments

As described above, a Holding provision is proposed for Block 2 to require a land use compatibility assessment for a *manufacturing and assembly industries* use due to sensitive uses within the influence area.

Analysis

The proposed development and proposed special provisions are appropriate as they implement the Light Industrial place type and the applicable policies of the Airport Road South Business Park Urban Design Guidelines, while considering and implementing the D-6 Series Guidelines.



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6.0 Financial Implications

Details for the preliminary financial calculations are provided on the Estimate of Claimable Works and Revenues Worksheet enclosed in **Appendix B**. A summary is provided in Table 5 below.

6.1 Summary of Revenues

A summary of the anticipated revenues, based on the developable area within the proposed development, is summarized in Table 3 below. Key assumptions applied during the financial review are as follows:

- ~34,650 m² (~50% of 6.93 ha blocks) of non-residential (commercial) space

Table 5: Summary of estimated DC Claims and CSRF Revenues

Estimated DC Claims	Estimated CSRF Revenues
\$170,000.00	\$14,242,536.00

6.2 Summary of Cost Sharable Works

At this preliminary stage of the planning process and subject to City review, potential claimable works costs for this subdivision development are anticipated to include the following:

- Sewer upsizing (storm and sanitary) per DC bylaw provisions.

As noted in Table 5 above, the estimated DC claim value is based upon high level assumptions and will need to be refined during detailed design and work plan review stage.

As previously noted in Section 8.2, given the substantial regional benefit it would bring for development in the area, the developer intends to present the Hamilton Road sanitary extension project as a CSRF funded Regional Trunk sewer at an upcoming Growth Management Implementation Strategy (GMIS) meeting.

7.0 Public Consultation Strategy

The Planning Act (specifically O. Reg. 544/06, amended by O. Reg. 178/16) requires that applicants submit a proposed strategy for consulting with the public with respect to an application as part of the 'complete' application requirements. This section summarizes the proposed Public Consultation Strategy.

The public consultation process for the proposed Draft Plan of Subdivision and Zoning By-law Amendment applications are anticipated to follow the Planning Act statutory requirements. The following points of public consultation are proposed:

- A Notice of Application setting out the intent of the proposed Applications will be circulated to local property owners and placed on the City's corporate website for consideration and requesting comment. The Notice will also identify that a future Planning and Environment Committee ("PEC") will be held respecting the application;
- The City will prepare a staff report, with the report to be available to the public in advance of the PEC meeting;
- A PEC meeting, which is the statutory public meeting, at which time public input will be received;
- The consultant team will co-ordinate a response to any questions from members of the public or Committee that could not be answered during the public meeting and will provide this information to County staff for consideration;
- A Council Meeting, at which time the City Staff Report, the PEC recommendation, all available information, and public input will be considered in Council's final decision. A Notice of Council Decision will subsequently be issued to interested parties.

The consultation strategy proposed will provide members of the public with opportunities to review, understand, and comment on the proposed Applications. The consultation strategy will be coordinated with City Staff and additional opportunities for consultation will be considered and may be warranted based on the input received.

8.0 Conclusions

This Final Proposal Report evaluates the proposed Draft Plan of Subdivision and Zoning By-law Amendment for the subject lands in the context of land use policies and regulations including the Planning Act, Provincial Planning Statement, The London Plan, and Zoning By-law Z.-1. Additionally, this Report summarizes the technical studies that have been prepared in support of the Applications and describes the proposed servicing strategy for the development.

The analysis contained within this Report demonstrates that the Applications represent good planning because:

1. The proposed development has appropriate regard to Section 2 of the Planning Act;
2. The proposed development is consistent with the Provincial Planning Statement;
3. The proposed Zoning By-law Amendment will implement the Light Industrial designation of The London Plan;
4. The proposed development facilitates the development of lands that are designated for industrial development and are within the Urban Growth Boundary;
5. The proposed light industrial uses will be compatible with surrounding development;
6. Natural heritage features and hazards have been identified and recommended buffers have been incorporated into the Draft Plan of Subdivision;
7. The proposed development can be adequately serviced; and,
8. The proposed development can be supported from a transportation perspective.

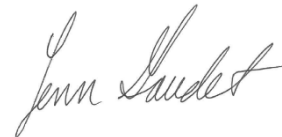
In summary, it is our opinion that the applications for a Zoning By-law Amendment and Draft Plan of Subdivision should be approved.

Respectfully submitted,

MHBC



Trevor Hawkins, M.PL, MCIP, RPP
Partner



Jennifer Gaudet, BES, MCIP, RPP
Associate

A

Appendix A: Engineering Calculations and Figures

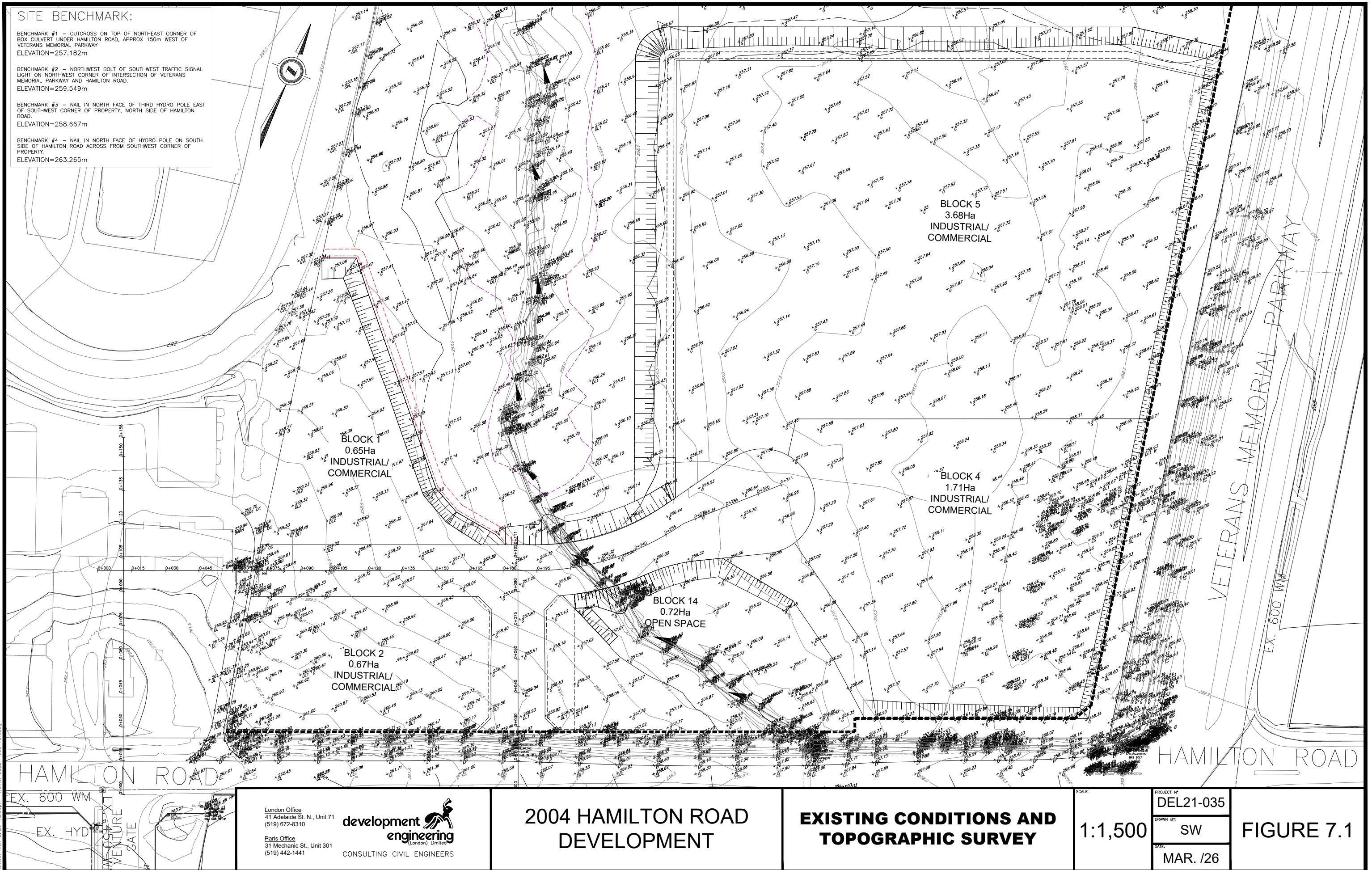
SITE BENCHMARK:

BENCHMARK #1 - CUTCROSS ON TOP OF NORTHEAST CORNER OF BOX CULVERT UNDER HAMILTON ROAD, APPROX 150m WEST OF VETERANS MEMORIAL PARKWAY
ELEVATION=257.182m

BENCHMARK #2 - NORTHWEST BOLT OF SOUTHWEST TRAFFIC SIGNAL LIGHT ON NORTHWEST CORNER OF INTERSECTION OF VETERANS MEMORIAL PARKWAY AND HAMILTON ROAD.
ELEVATION=259.549m

BENCHMARK #3 - NAIL IN NORTH FACE OF THIRD HYDRO POLE EAST OF SOUTHWEST CORNER OF PROPERTY, NORTH SIDE OF HAMILTON ROAD.
ELEVATION=258.667m

BENCHMARK #4 - NAIL IN NORTH FACE OF HYDRO POLE ON SOUTH SIDE OF HAMILTON ROAD ACROSS FROM SOUTHWEST CORNER OF PROPERTY.
ELEVATION=263.265m



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(London) Limited
CONSULTING CIVIL ENGINEERS

**2004 HAMILTON ROAD
DEVELOPMENT**

**EXISTING CONDITIONS AND
TOPOGRAPHIC SURVEY**

SCALE

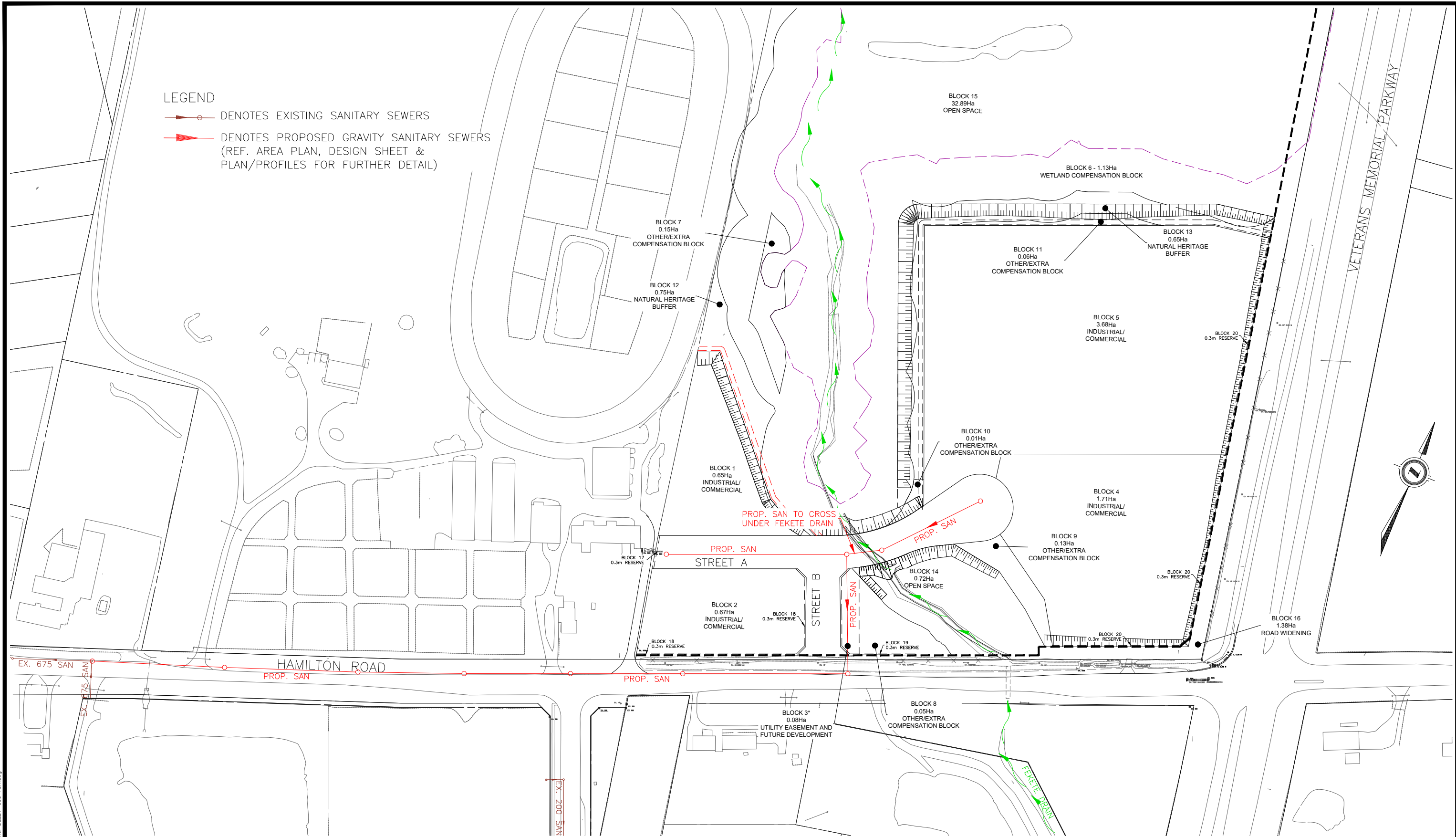
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DEL21-035

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MAR. /26

FIGURE 7.1

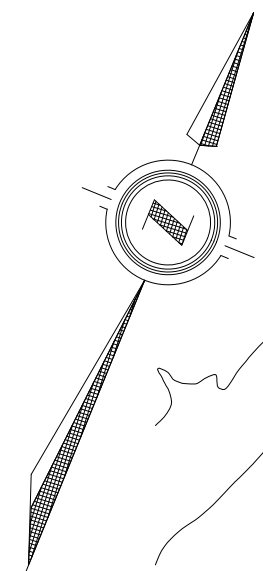


BENCHMARK #1 - CUTCROSS ON TOP OF NORTHEAST CORNER OF
BOX CULVERT UNDER HAMILTON ROAD, APPROX 150m WEST OF
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ELEVATION=257.182m

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ROAD.
ELEVATION=258.667m

BENCHMARK #4 - NAIL IN NORTH FACE OF HYDRO POLE ON SOUTH
SIDE OF HAMILTON ROAD ACROSS FROM SOUTHWEST CORNER OF
PROPERTY.
ELEVATION=263.265m



1918 HAMILTON ROAD
UNABLE TO BE SERVICED
BY GRAVITY
~46.19 Ha

1918 HAMILTON ROAD
ABLE TO BE SERVICED
BY GRAVITY
~5.14 Ha

2004 HAMILTON ROAD



VETERANS MEMORIAL PARKWAY

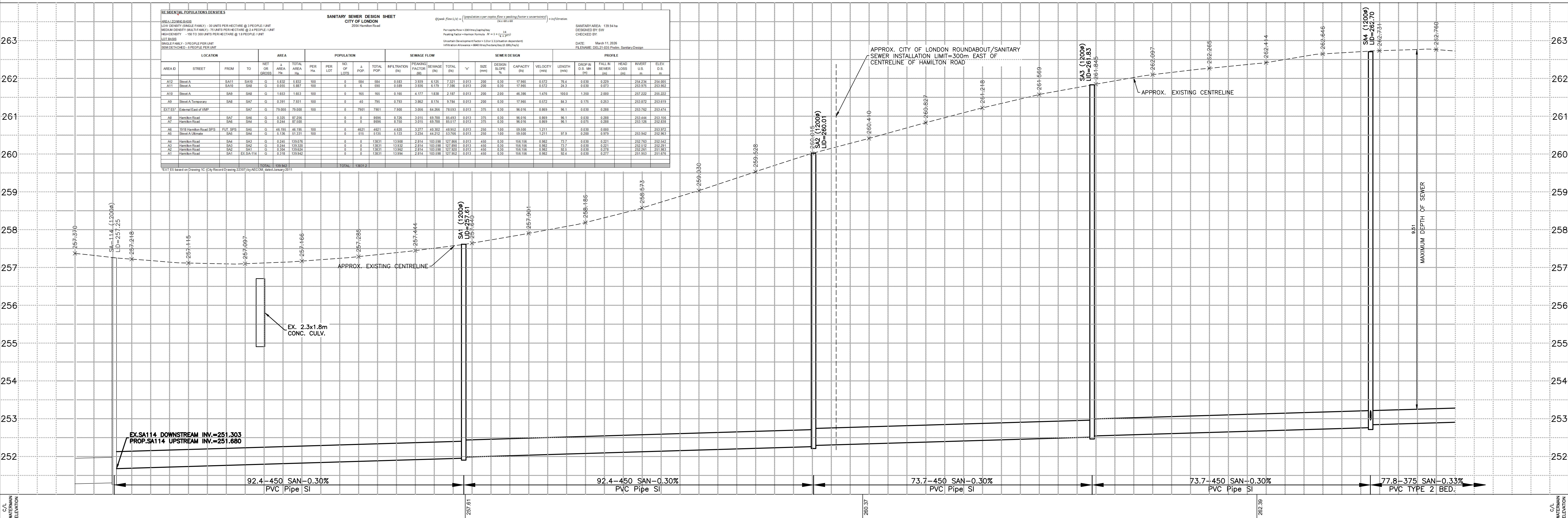
HAMILTON ROAD

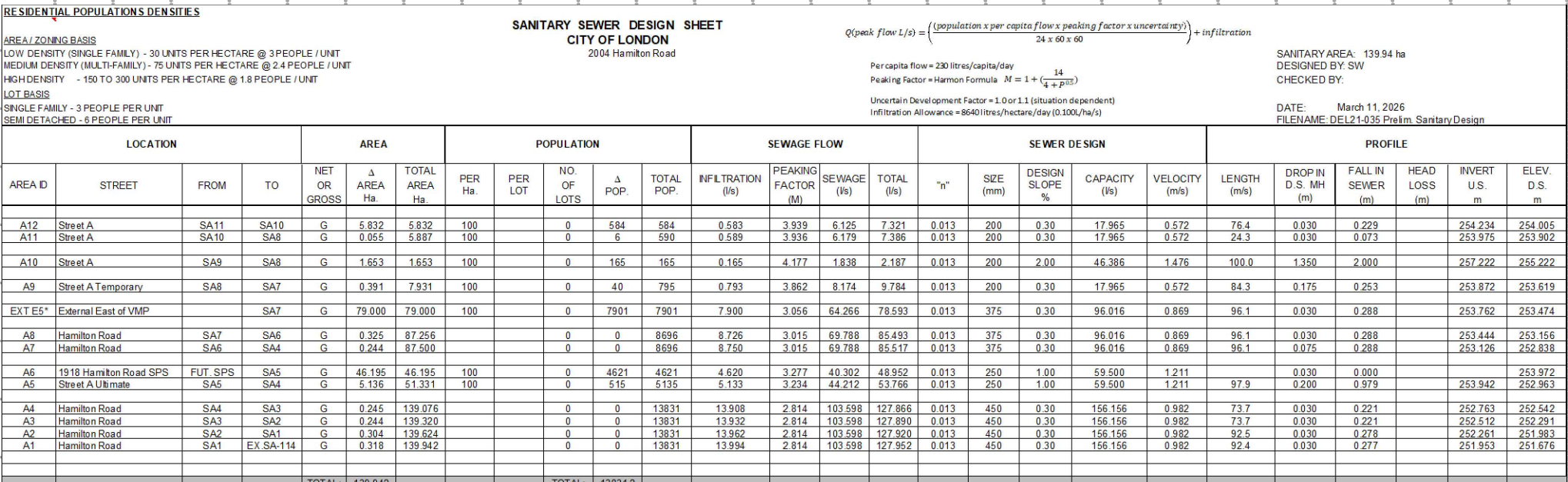
RESIDENTIAL POPULATIONS DENSITIES				SANITARY SEWER DESIGN SHEET										$Q(\text{peak flow } L_f) = \left(\frac{\text{population } x \text{ per capita flow } x \text{ peaking factor } x \text{ uncertainty}}{24 \times 60 \times 60} \right) + \text{infiltration}$																
AREA / ZONING BASIS				CITY OF LONDON																										
LOW DENSITY (SINGLE FAMILY) - 30 UNITS PER HECTARE @ 3 PEOPLE / UNIT				2004 Hamilton Road										SANITARY AREA: 139.94 ha																
MEDIUM DENSITY (MULTI-FAMILY) - 75 UNITS PER HECTARE @ 2.4 PEOPLE / UNIT														DESIGNED BY SW																
HIGH DENSITY - 150 TO 300 UNITS PER HECTARE @ 1.8 PEOPLE / UNIT														CHECKED BY:																
LOT BASIS																														
SINGLE FAMILY - 3 PEOPLE PER UNIT														DATE: March 11, 2026																
SEMI DETACHED - 6 PEOPLE PER UNIT														FILE NAME: DEL21-035 Prelim Sanitary Design																
LOCATION				AREA			POPULATION				SEWAGE FLOW				SEWER DESIGN				PROFILE											
AREA ID	STREET	FROM	TO	NET OR CROSS	Δ AREA Ha.	TOTAL AREA Ha.	PER Ha.	PER LOT	NO. OF LOTS	Δ POP.	TOTAL POP.	INFILTRATION (l/s)	PEAKING FACTOR (M)	SEWAGE (l/s)	TOTAL (l/s)	"n"	SIZE (mm)	DESIGN SLOPE %	CAPACITY (l/s)	VELOCITY (m/s)	LENGTH (m/s)	DROP IN D.S. (m)	FALL IN SEWER (m)	HEAD LOSS (m)	INVERT U.S.	ELEV. D.S.				
A12	Street A	SA11	SA10	G	5.832	5.832	100		0	584	584	0.583	3.938	6.125	7.321	0.013	200	0.30	17.965	0.572	78.4	0.030	0.228		254.234	254.005				
A11	Street A	SA10	SA8	G	0.055	5.887	100		0	6	590	0.589	3.938	6.179	7.396	0.013	200	0.30	17.965	0.572	24.3	0.030	0.073		253.975	253.902				
A10	Street A	SA9	SA8	G	1.653	1.653	100		0	165	165	0.165	4.177	1.838	2.187	0.013	200	2.00	46.386	1.476	100.0	1.350	2.000		257.222	255.222				
A9	Street A Temporary	SA8	SA7	G	0.391	7.931	100		0	40	795	0.793	3.862	8.174	9.784	0.013	200	0.30	17.965	0.572	84.3	0.175	0.253		253.872	253.619				
EXTES*	External East of VMP	SA7	SA7	G	79.000	79.000	100		0	7901	7901	7.900	3.056	64.266	78.933	0.013	375	0.30	98.016	0.869	96.1	0.030	0.288		253.762	253.474				
A8	Hamilton Road	SA7	SA6	G	0.325	87.256	100		0	8696	8.726	3.015	69.788	85.493	0.013	375	0.30	96.016	0.869	96.1	0.030	0.288		253.444	253.156					
A7	Hamilton Road	SA6	SA4	G	0.244	87.500	100		0	8696	8.750	3.015	69.788	85.517	0.013	375	0.30	96.016	0.869	96.1	0.030	0.288		253.126	252.838					
A6	1918 Hamilton Road SPS	FUT. SPS	SA5	G	46.195	46.195	100		0	4621	4621	4.620	3.277	40.302	48.952	0.013	250	1.00	59.500	1.211					253.972					
A5	Street A Ultimate	SA5	SA4	G	5.136	51.331	100		0	515	5135	5.133	3.234	44.212	53.766	0.013	250	1.00	59.500	1.211					253.942	252.963				
A4	Hamilton Road	SA4	SA3	G	0.245	139.076	100		0	0	13831	13.908	2.814	103.598	127.866	0.013	450	0.30	156.156	0.882	73.7	0.030	0.221		252.763	252.542				
A3	Hamilton Road	SA3	SA2	G	0.244	139.320	100		0	0	13831	13.932	2.814	103.598	127.690	0.013	450	0.30	156.156	0.882	73.7	0.030	0.221		252.512	252.291				
A2	Hamilton Road	SA2	SA1	G	0.304	139.624	100		0	0	13831	13.962	2.814	103.598	127.516	0.013	450	0.30	156.156	0.882	92.5	0.030	0.221		252.261	251.983				
A1	Hamilton Road	SA1	EX SA-114	G	0.318	139.942	100		0	0	13831	13.994	2.814	103.598	127.952	0.013	450	0.30	156.156	0.882	92.4	0.030	0.227		251.953	251.676				
TOTAL:				139.942			TOTAL:				13831.2																			

*EXTE5 based on Drawing 1C (City Record Drawing 22307) by AECOM, dated January 201

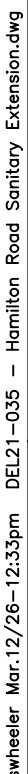
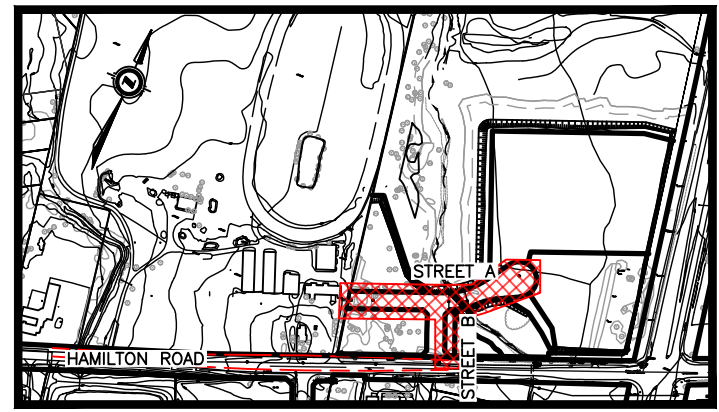
Mar. 12/26-12:33pm DEL21-035 - Hamilton Road Sanitary Extension.dwg

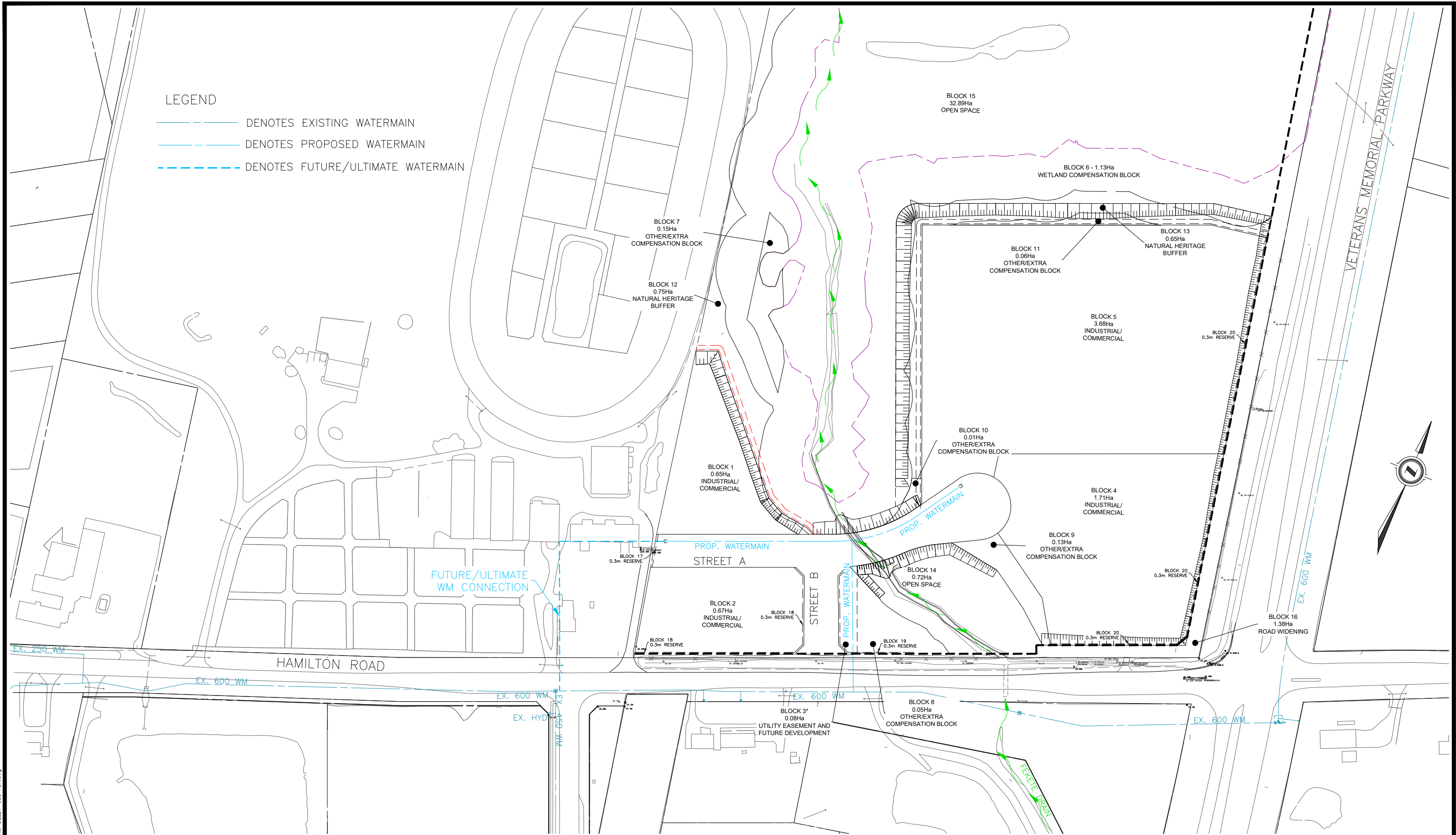
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*EXT E5 based on Drawing 1C (City Record Drawing 22307) by AECOM, dated January 2011





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2004 HAMILTON ROAD DEVELOPMENT

PROPOSED WATER SERVICING STRATEGY

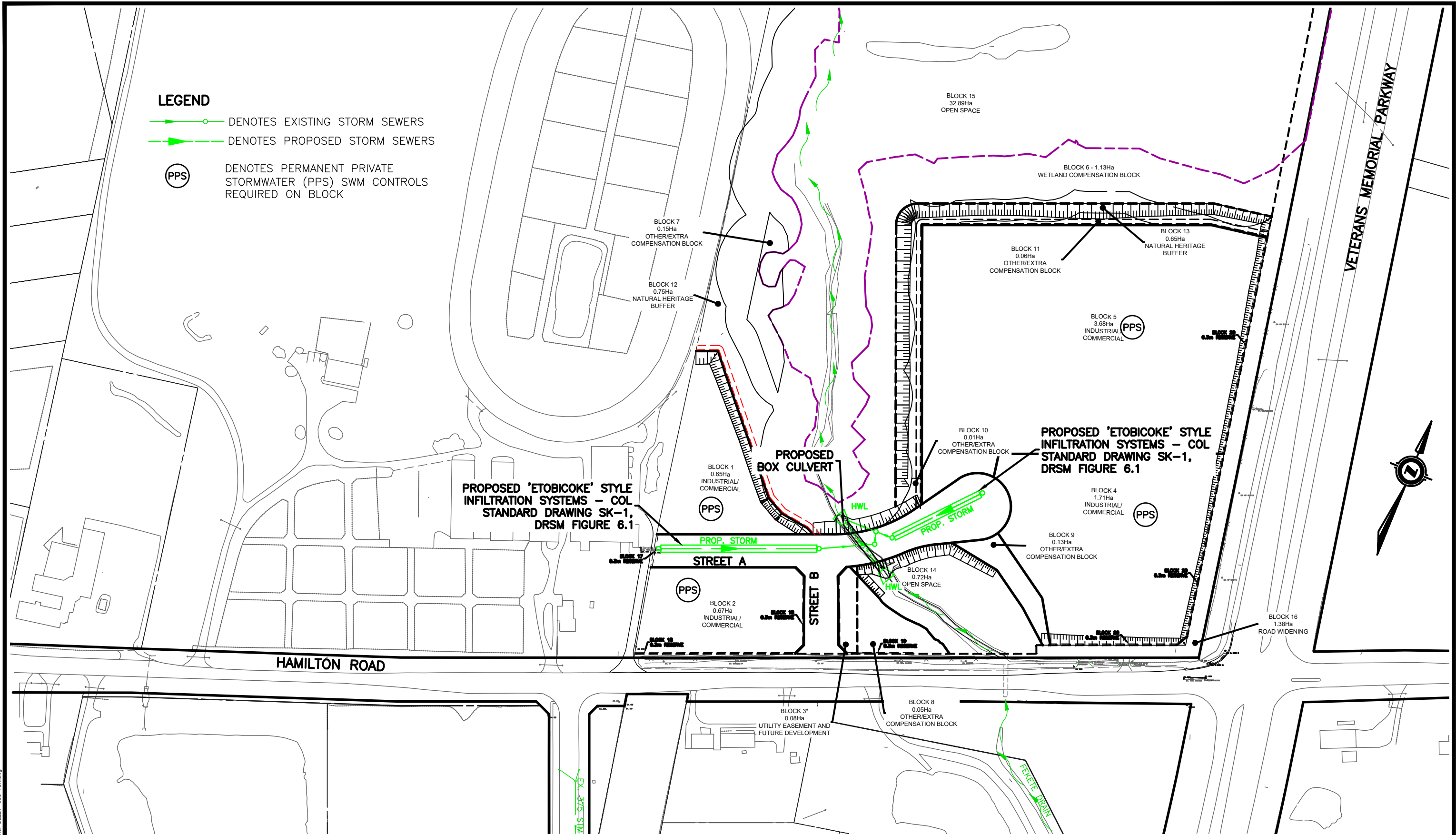
SCALE
1:2,500

PROJECT N°
DEL21-035

DRAWN BY:
SW

DATE:
MAR. /26

Figure 9.1



Plotted: Mar 12/26 - 12:54pm Name: DEL21-035 FSR.dwg

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**2004 HAMILTON ROAD
DEVELOPMENT**

**PROPOSED STORM/SWM
SERVICING STRATEGY**

SCALE
1:2,500

PROJECT N°
DEL21-035

DRAWN BY:
SW

DATE:
MAR. /26

Figure 10.1

SITE BENCHMARK:

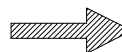
BENCHMARK #1 - CUTCROSS ON TOP OF NORTHEAST CORNER OF BOX CULVERT UNDER HAMILTON ROAD, APPROX 150m WEST OF VETERANS MEMORIAL PARKWAY
ELEVATION=257.182m

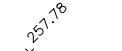
BENCHMARK #2 - NORTHWEST BOLT OF SOUTHWEST TRAFFIC SIGNAL LIGHT ON NORTHWEST CORNER OF INTERSECTION OF VETERANS MEMORIAL PARKWAY AND HAMILTON ROAD.
ELEVATION=259.549m

BENCHMARK #3 - NAIL IN NORTH FACE OF THIRD HYDRO POLE EAST OF SOUTHWEST CORNER OF PROPERTY, NORTH SIDE OF HAMILTON ROAD.
ELEVATION=258.667m

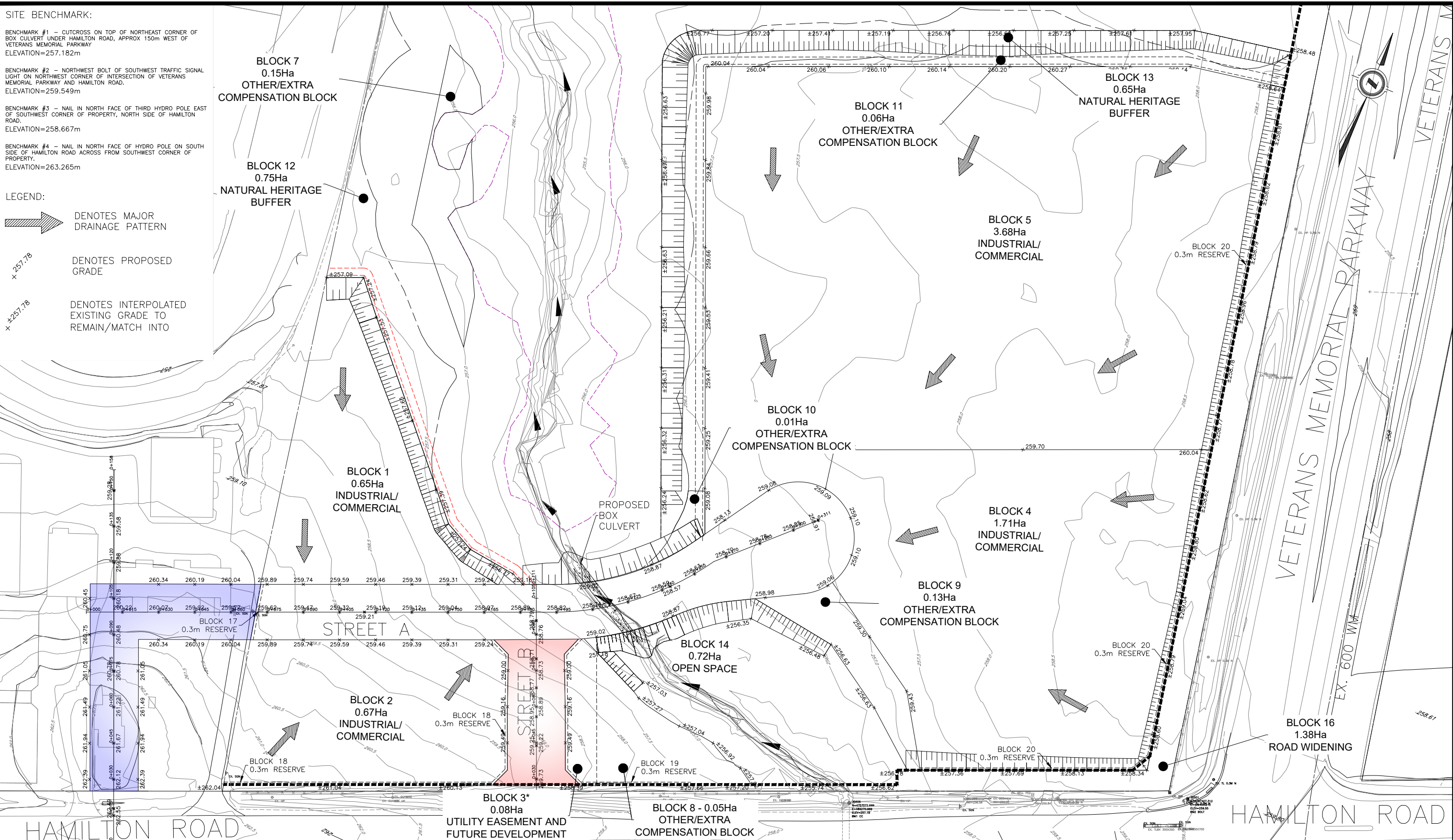
BENCHMARK #4 - NAIL IN NORTH FACE OF HYDRO POLE ON SOUTH SIDE OF HAMILTON ROAD ACROSS FROM SOUTHWEST CORNER OF PROPERTY.
ELEVATION=263.265m

LEGEND:

 DENOTES MAJOR DRAINAGE PATTERN

 DENOTES PROPOSED GRADE

 DENOTES INTERPOLATED EXISTING GRADE TO REMAIN/MATCH INTO



Plotted: Mon 12/26 - 12:35pm Name: DEL21-035 FSR.dwg

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**2004 HAMILTON ROAD
DEVELOPMENT**

**PRELIMINARY GRADING
DESIGN**

SCALE

1:1,500

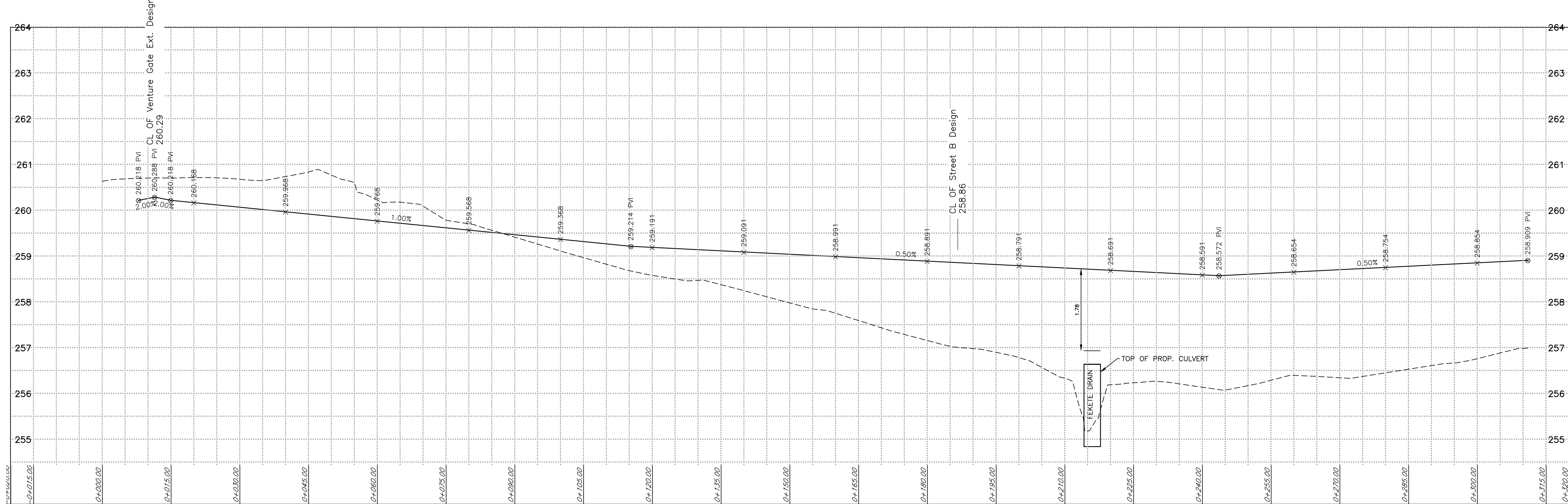
PROJECT N°
DEL21-035

DRAWN BY:
SW

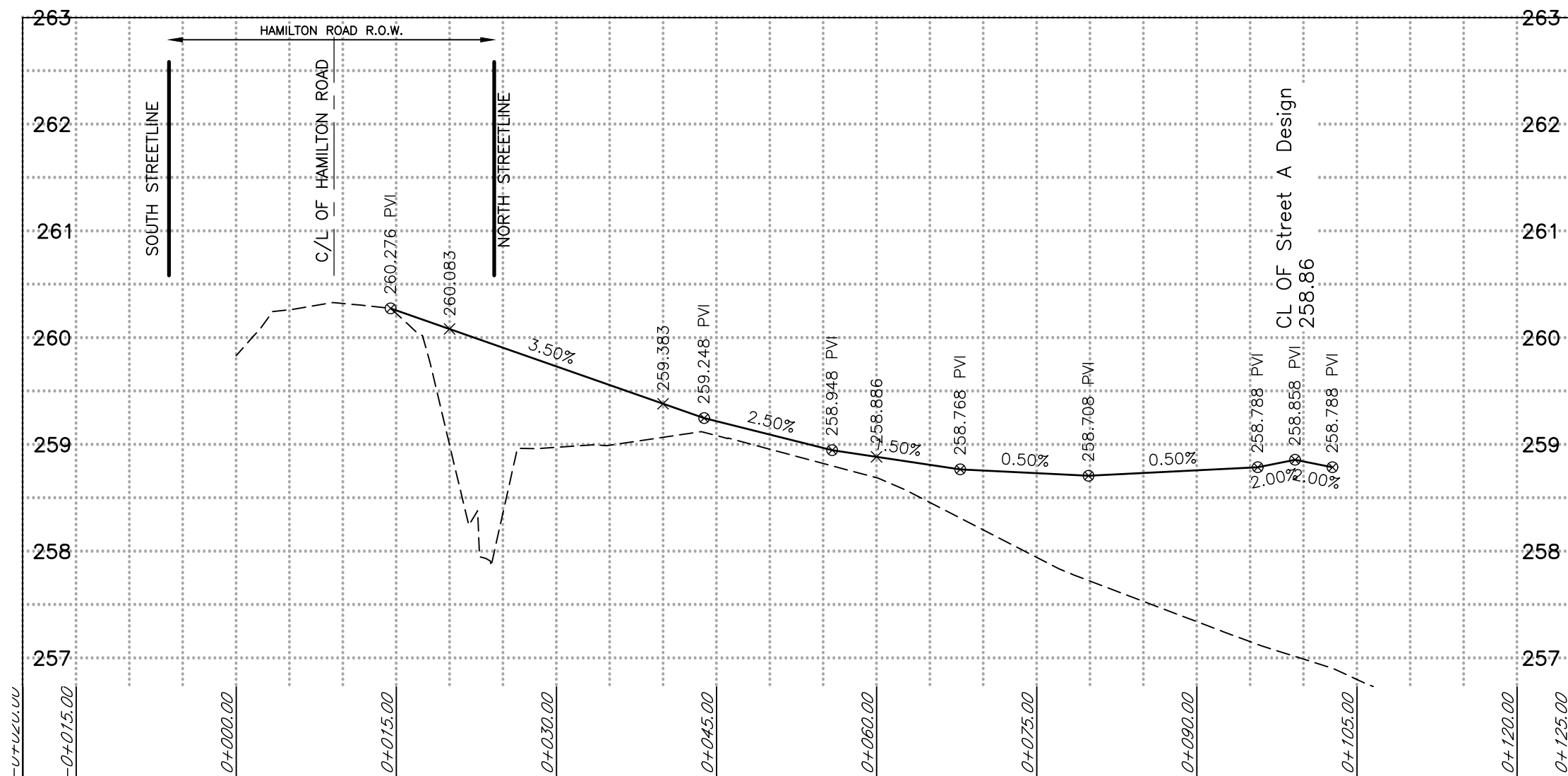
DATE:
MAR. /26

Figure 10.2

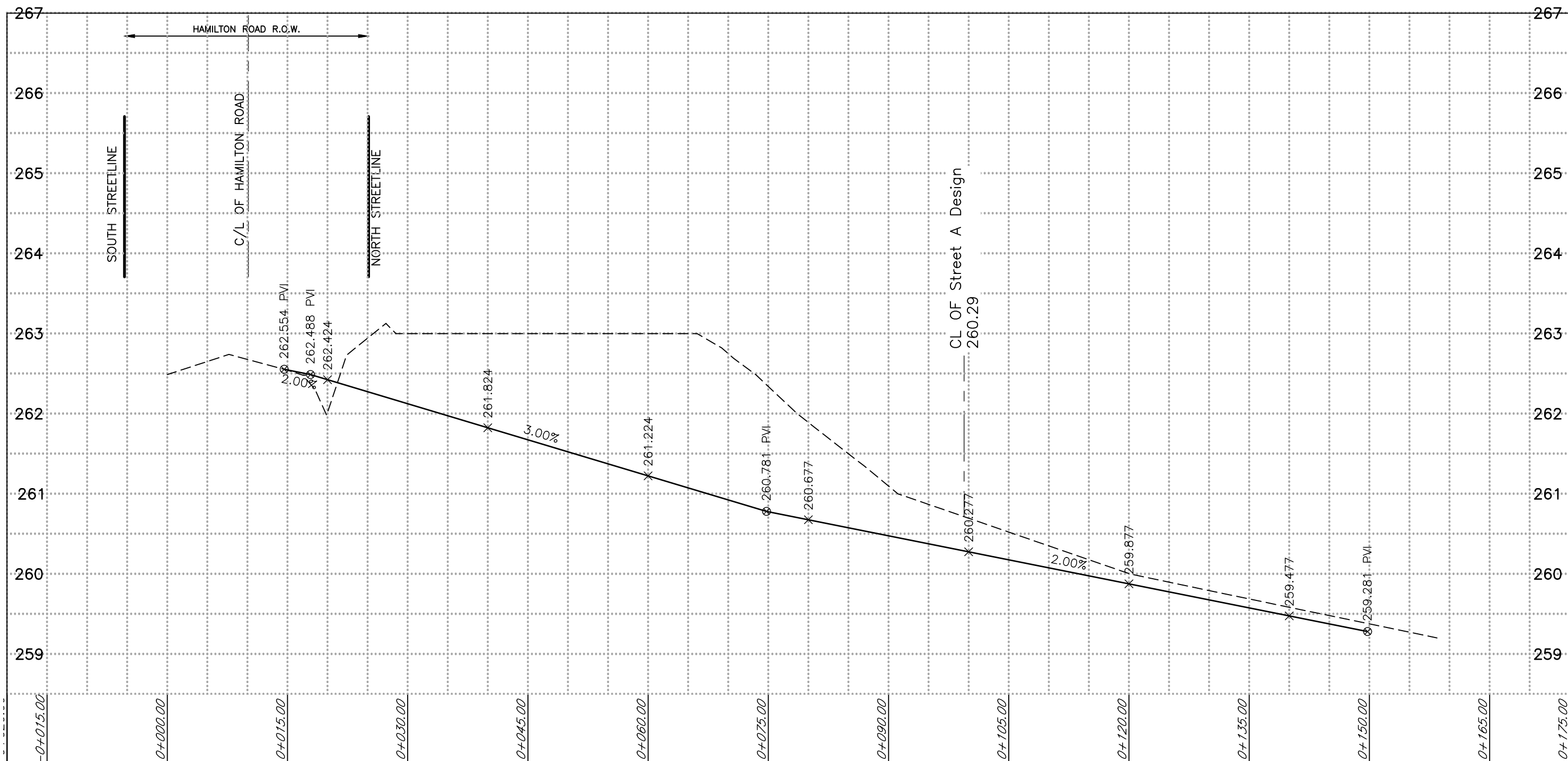
STREET A PROFILE



STREET B PROFILE



VENTURE GATE EXTENSION PROFILE



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2004 HAMILTON ROAD
DEVELOPMENT

PRELIMINARY PROFILES

1:500

PROJECT N°
DEL21-035
DRAWN BY:
sw
DATE:
MAR. /26

Figure 10.3

SITE BENCHMARK:

BENCHMARK #1 - CUTCROSS ON TOP OF NORTHEAST CORNER OF BOX CULVERT UNDER HAMILTON ROAD, APPROX 150m WEST OF VETERANS MEMORIAL PARKWAY
ELEVATION=257.182m

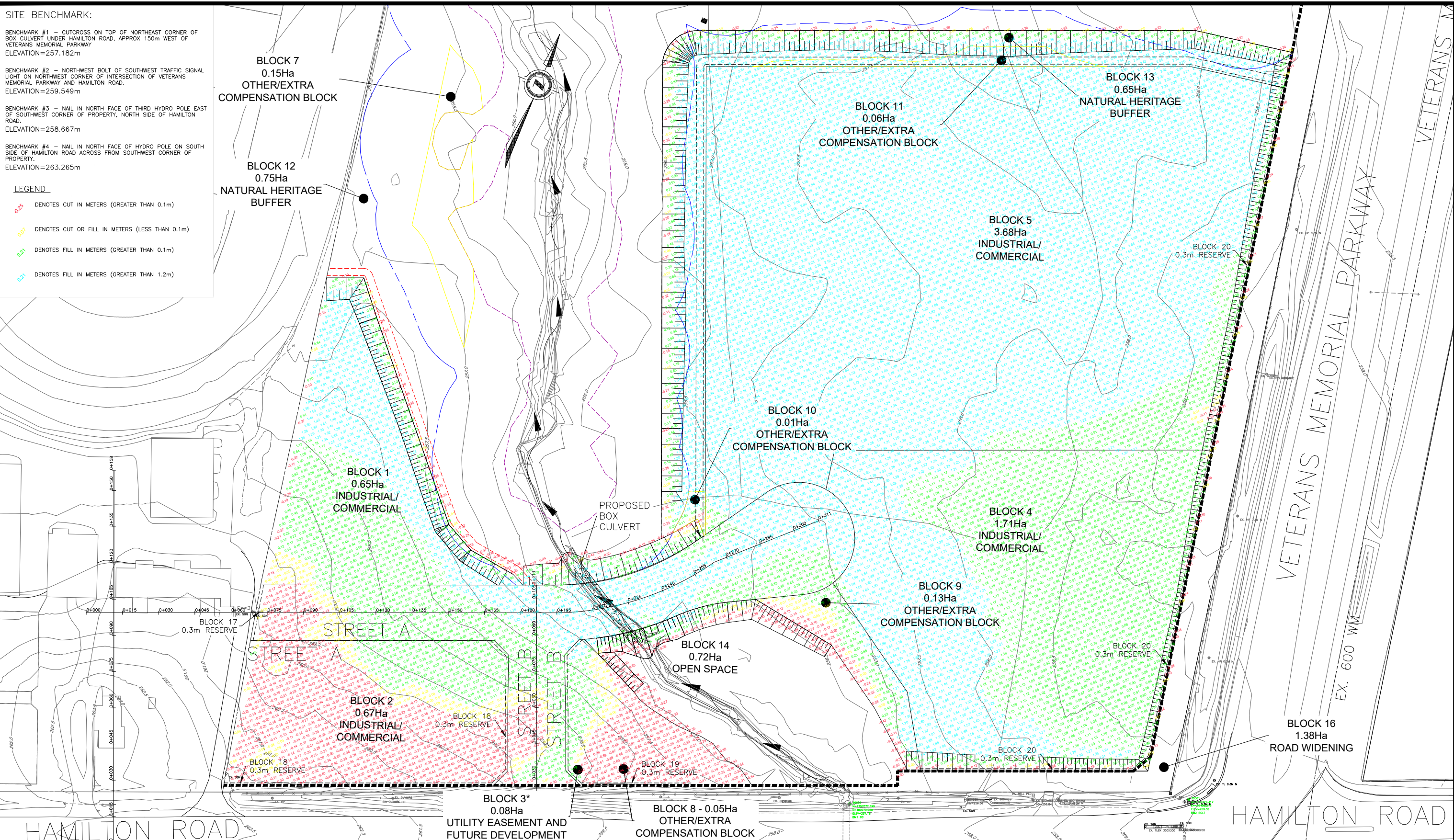
BENCHMARK #2 - NORTHWEST BOLT OF SOUTHWEST TRAFFIC SIGNAL LIGHT ON NORTHWEST CORNER OF INTERSECTION OF VETERANS MEMORIAL PARKWAY AND HAMILTON ROAD.
ELEVATION=259.549m

BENCHMARK #3 - NAIL IN NORTH FACE OF THIRD HYDRO POLE EAST OF SOUTHWEST CORNER OF PROPERTY, NORTH SIDE OF HAMILTON ROAD.
ELEVATION=258.667m

BENCHMARK #4 - NAIL IN NORTH FACE OF HYDRO POLE ON SOUTH SIDE OF HAMILTON ROAD ACROSS FROM SOUTHWEST CORNER OF PROPERTY.
ELEVATION=263.265m

LEGEND

- 0.25 DENOTES CUT IN METERS (GREATER THAN 0.1m)
- 0.07 DENOTES CUT OR FILL IN METERS (LESS THAN 0.1m)
- 0.21 DENOTES FILL IN METERS (GREATER THAN 0.1m)
- 0.21 DENOTES FILL IN METERS (GREATER THAN 1.2m)



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2004 HAMILTON ROAD DEVELOPMENT

PRELIMINARY DESIGN VOLUME CALCULATION

SCALE
1:1,500

PROJECT N°
DEL21-035
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DATE:
MAR. /26

Figure 10.4

B

Appendix B: Estimate of Claimable Works and Revenues Worksheet



Initial Proposal Report (IPR) Claimable Works & DC Revenue Estimate Worksheet
City of London - Development Finance
Development Charges By-law C.P.-1551-227

Development:	2004 Hamilton Road	TS File #:	TS2023-003
Address:	2004 Hamilton Road	Prepared By:	Development Engineering (London) Ltd.
Applicant:	Kreative Development Inc.	Date Prepared:	April, 2026

Claimable Works			
Provide a current cost estimate and construction year of anticipated DC claimable works required to facilitate the proposed development.			
DC Claimable Works	Current Cost Estimate (\$)	Current DC Study / GMIS Construction Year	Notes / Description
Minor Roadworks ¹			
Road Oversizing ¹			
Wastewater Oversizing	\$170,000	2026	Apprx. 330m 450mm dia. & 160m 375mm dia. SAN on Hamilton Rd.
Storm Sewer Oversizing			
Watermain Oversizing			
LID Subsidy			
Trunk Watermain / Sewer ¹			
Major SWM Works ¹			
SWM Facility Land			
Other			
Total	\$ 170,000		

DC Revenue Estimate						
Provide summary of proposed units/floor space to calculate estimated revenue. Use typical unit/ha densities for blocks and actual lot counts if available.						
Residential		Hectares	Units per Hectare	Proposed Units	CSRF Rate (\$/unit)	CSRF Revenue
Low Density Single & Semi Detached				0.0	\$50,564	\$ -
Medium Density Multiples / Row Housing				0.0	\$34,195	\$ -
High Density	Apartment < 2 bedroom			0.0	\$22,364	\$ -
	Apartment >= 2 bedroom			0.0	\$30,306	\$ -
Non-Residential		Hectares	Sq m. per Hectare	Proposed Floor Space	CSRF Rate (\$/m2)	CSRF Revenue
Commercial				0.0	\$428.30	\$ -
Institutional				0.0	\$264.21	\$ -
Industrial		6.9	5,000.0	34,650.0	\$305.33	\$ 10,579,684.50
Total						\$ 10,579,684.50

Notes:

1. Claimable works subject to submission of a Work Plan by the Owner's consulting engineer for City review and approval at time of first submission of Engineering drawings.
2. Development Charges By-Law C.P.-1551-227 rates effective from January 1, 2026 to December 31, 2026
3. The City employs a "citywide" approach to cost recovery for eligible growth services, therefore the estimated Claimable Works & DC Revenues are not directly comparable.

C

Appendix C: Zoning Data Sheet

ZONING DATA SHEET – ZONING BY-LAW AMENDMENT

To be completed by Applicant as part of Complete Application

File No.

Municipal street address: 2004 Hamilton Road	
Legal Description: Part of Lot 5, Concession 1	
Street Frontage / Street Flankage (name): Hamilton Road	
Existing Zone(s) in Z.-1 Zoning By-law: UR6, OS4, ER	Proposed Zone(s) in Zoning By-law: LI1/LI4/LI5 with site-specific provisions. Block 2 subject to an H

(a) Use	Varies	As permitted in requested zones
(b) Lot Area (m²) Min	2,000 m2	0.22 ha
(c) Lot Frontage (m) Min	30	60 m
(d) Front Yard Depth (m) Main Building/ Garage (m) Min		
(e) Rear Yard Depth (m) Min		
(f) Interior Yard Depth (m) Min		
(g) Interior Yard Depth (m) Min		
(h) Exterior Yard Depth (m) Min		
(i) Lot Coverage (%) Max		
(j) Landscaped Open Space (% Min)		
(k) Height (m) Max		
(l) Off-street Parking Min (rate/number)		
(m) Bicycle Parking Min (rate/number)		
(n) Parking Area Coverage (%) Max		
(o) Parking Set Back Min		
(p) Gross Floor Area (m²) Max		
(q) Gross Floor Area For Specific Uses (m²) Max		
(r) Yard Encroachments (if applicable)		
(s) Density Max (rate/number) (see Section 3.4 1) for mixed-use)		
(t) Special Provisions		Holding provision for Block 2 (refer to FPR)
(u) Other By-law Regulations		Special provisions (refer to FPR)

NOTE:

- Please be sure to carefully review and include data / details related to:
 - General Provisions (Section 4) of the Zoning By-law
 - Zones and Zone Symbols (Section 3) of the Zoning By-law
 - Regulations Section and Table for Proposed Zone
 - Zoning By-law Definitions
- The Applicant is responsible for submitting complete & accurate information on the Zoning Data Sheet and associated plans.
- Failure to provide complete & accurate information on the Zoning Data Sheet and associated plans will result in processing delays, and may require the submission of a revised Zoning By-law amendment application.

