

City of London
Planning and Development
300 Dufferin Avenue
London, ON
N6E 1L3

July 28, 2026
File 10574

Attn: Nicole Musicco
Manager, Subdivision Planning

RE: Planning Justification Letter – Official Plan Amendment and Zoning By-law Amendment
1944 Bradley Avenue, City of London
Related File Numbers: 39T-23505, Z-9724 & OPA 113

Weston Consulting is the authorized planning consultant for Elite Bradley Development Inc. (“Elite Developments”), the registered owner of the property municipally known as 1944 Bradley Avenue, in the City of London (herein referred to as the “subject property”). The City of London issued conditional Draft Plan of Subdivision Approval (File No. 39T-23505) on May 16, 2024. The applicant is currently working closely with City staff to address detailed site design comments and to satisfy the outstanding conditions.

During application review and Detailed Design processes, modifications were initiated by City planning staff to refine the boundaries of the proposed residential lots located in the northern portion of the subject property, creating a linear boundary between the open space area to the north. As a result, minor adjustments are required to the boundary of the *Green Space* land use designation in the London Official Plan, as well as the corresponding *Open Space (OS5)* zone under the City of London Zoning By-law No. Z.-1.

This matter has been discussed with City staff, and the following planning justification has been prepared in support of the proposed Official Plan Amendment and Zoning By-law Amendment applications associated with these minor adjustments.

Description of the Subject Property

The subject property is located along Bradley Avenue, east of Highbury Avenue South with an approximate site area of 72.11 hectares (104.06 acres), and an approximate frontage of 412.57 metres along Bradley Avenue (Figure 1). The subject property is legally described as:

SOUTH 1/2 LOT 11 CONCESSION 1 AS IN 131297; SUBJECT TO WU53488, 128155LONDON/WESTMINSTER.

The majority of the subject property is occupied by agricultural lands. A large open space area is located on the northern portion of the property, containing significant woodlots and wetlands. The southeast corner of the subject property features a residential dwelling, a barn, and several accessory structures. The subject property is also bisected by a Hydro corridor. The conditionally approved Draft Plan of Subdivision is limited to the lands north of the Hydro corridor.



Figure 1: Aerial Image of Subject Property

Project Background and Status

In July 2023, a Draft Plan of Subdivision application was submitted to facilitate residential development on the northern portion of the subject property. Following the submission, a pre-consultation meeting was held with City staff in January 2024 to discuss the need for a technical Official Plan Amendment (“OPA”) and a Zoning By-law Amendment (“ZBA”) application. The technical OPA was required to facilitate a new public road connection with the adjacent subdivision road network to the west, and future extension of Evans Boulevard. The OPA add a Neighbourhood Connector classification that generally corresponds with the Neighbourhood Connector roads that were proposed through the Draft Plan of Subdivision. The ZBA application was required to rezone the lands to establish site specific zoning permissions to facilitate the various built forms of the proposed development. The formal ZBA application was submitted in March 2024. In May 2024, a Notice of Draft Approval was issued for the Draft Plan of Subdivision Application. Further, the OPA and ZBA applications were approved by City Council in June 2024.

Following approval of the ZBA and the conditional approval of the Draft Plan of Subdivision application, a Design Studies Pre-Submission Meeting was held with the City in January 2025 to clarify the Draft Plan Conditions and to confirm the design studies and other required materials to be submitted. A Design Studies Submission was made in May 2025 in accordance with the list of required reports and design studies received from City staff. Following receipt of the comments received through the Design Studies Submission, a First Detailed Engineering Design submission was made in November 2025.

During application review and Detailed Design processes, modifications were initiated by City planning staff to refine the boundaries of the proposed residential lots located in the northern portion of the subject property, creating a linear

boundary between the open space area to the north. On January 27, 2026, City planning staff advised that an OPA and ZBA would be required to ensure that the lots and the open space area are appropriately designated and zoned. While City planning staff acknowledged that they have no significant planning concerns regarding the proposed amendments, the applications are nevertheless required to satisfy procedural and conformity requirements.

Purpose of the Applications

The following minor, technical refinements are required to implement the conditionally approved Draft Plan of Subdivision and to reflect the Detailed Design work completed in consultation with City staff:

Official Plan Amendment

The purpose of the OPA is to redesignate a portion of the lands from the *Neighbourhoods* designation to the *Green Space* designation (illustrated in green in Figure 2), and a portion of the lands from the *Green Space* designation to the *Neighbourhoods* designation (illustrated in yellow in Figure 2). This amendment is required to reflect the creation of a linear boundary, permitting a variable buffer, as determined through the Detailed Design work associated with the conditionally approved Draft Plan of Subdivision, between the proposed rear lot lines of the proposed single detached dwellings along the northern portion of the property and the open space area further to the north.

Zoning By-law Amendment

The purpose of the ZBA application is to rezone a portion of the lands from the *Holding Residential R1 Special Provision (h-17*R1-3(26)) Zone* to the *Open Space (OS5) Zone* (illustrated in green in Figure 2), and rezone a portion of the lands from the *Open Space (OS5) Zone* to the *Holding Residential R1 Special Provision (h-17*R1-3(26)) Zone* (illustrated in yellow in Figure 2). In line with the OPA, this amendment is required to reflect the creation of a linear boundary, permitting a variable buffer, as determined through the Detailed Design work associated with the conditionally approved Draft Plan of Subdivision, between the proposed rear lot lines of the proposed single detached dwellings along the northern portion of the property and the open space area further to the north.

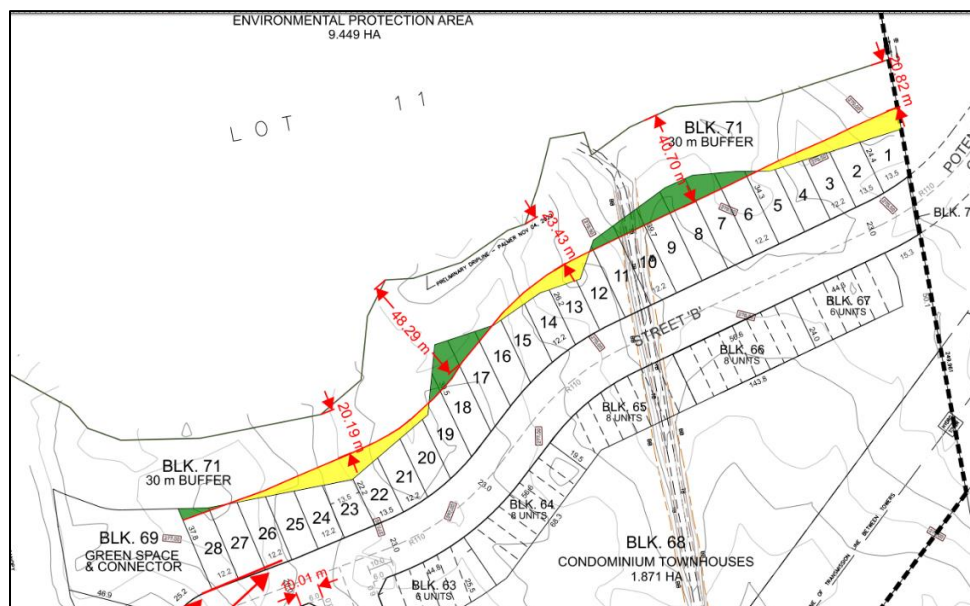


Figure 2: Variable Buffer Area

Policy Analysis

The following section includes detailed information regarding the applicable statutory policy documents to determine whether the proposed amendments are supported by the applicable planning framework and represent good planning. The documents include the *Planning Act*, R.S.O. 1990, c. P.13, (the “*Planning Act*”), the Provincial Policy Statement, 2024 (“PPS”), The London Plan, 2022 (the “Official Plan”), and the City of London Zoning By-law Z-1 (“ZBL Z-1”).

It is important to note that Final Proposal Reports were prepared in support of the Draft Plan of Subdivision application 39T-23505 (dated July 2023) and ZBA application Z-9724 (dated March 2024) to provide justification for the proposed development and initial ZBA application (together referred to as the “2023 and 2024 Reports”). The following policy analysis expands on the analysis provided in the 2023 and 2024 Reports, in the context of the enclosed OPA and ZBA applications.

Planning Act, R.S.O. 1990, c. P.13

Land use planning in Ontario is governed by the *Planning Act*, which establishes the legislative framework for regulating land use, development approvals, and the preparation and implementation of planning policy documents such as Official Plans and Zoning By-laws. Under the *Planning Act*, municipalities are responsible for preparing Official Plans to guide long term land use patterns and growth management within their jurisdiction. Zoning By-laws are subsequently enacted to implement Official Plan policies and to regulate the use of land, buildings, and structures.

The proposed OPA and ZBA applications are limited in scope and seek to creating a linear boundary between the residential lands and the open space area to the north. The Draft Plan of Subdivision has been conditionally approved by the City, confirming the overall appropriateness of the development proposal, and has been supported by the required technical studies, including an Environmental Impact Assessment. As the applications do not alter the intent of the approved development, and instead refine the lot configuration and open space boundary, it is our opinion that the proposed OPA and ZBA have appropriate regard for the applicable matters of provincial interest set out in Section 2 of the *Planning Act*, including the orderly development of safe and healthy communities, the appropriate location of growth and development, the provision of housing, and the protection of public health, safety, and natural features.

Provincial Planning Statement

The PPS provides the overarching provincial policy framework for land use planning in Ontario under the *Planning Act*. Municipal planning decisions are required to be consistent with the policies of the PPS. The PPS promotes efficient land use patterns, the protection of natural resources, and the orderly development of communities through coordinated planning of land use and infrastructure. The policies direct growth to settlement areas where Municipal services are available, or planned, and support the efficient use of existing infrastructure and public service facilities.

The proposed OPA and Zoning By-law Amendment ZBA are consistent with the applicable policies of the PPS. The amendments are limited to refining the boundary between the proposed residential lots and the open space lands to the north and do not alter the overall intent of the development concept, density, housing supply, or servicing strategy established through the conditionally approved Draft Plan of Subdivision. The environmental buffer and development limits to the significant woodland remain appropriate, and no development is proposed within the natural heritage features or their associated protection areas. Accordingly, the proposed amendments continue to support the PPS objectives for efficient development within settlement areas, while maintaining the long-term protection of natural heritage features. It is our opinion that the proposed OPA and ZBA are consistent with the applicable policies of the PPS, 2024.

Section 4.1 of the PPS addresses Natural Heritage features and policies related to their protection, including prohibiting negative impacts on significant woodlands, significant wetland, significant wildlife habitat, and other identified natural heritage features:

4.1. Natural Heritage

4. Development and site alteration shall not be permitted in:

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

5. Development and site alteration shall not be permitted in:

- a) significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E1;
- b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)1;
- c) significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)1;
- d) significant wildlife habitat;
- e) significant areas of natural and scientific interest; and f) coastal wetlands in Ecoregions 5E, 6E and 7E1 that are not subject to policy 4.1.4.b), unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.

6. Development and site alteration shall not be permitted in fish habitat except in accordance with provincial and federal requirements.

7. Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.

8. Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.

Environmental feature stakings were undertaken with the City and Upper Thames River Conservation Authority ("UTRCA") to establish appropriate buffers and development limit from the existing Significant Woodlands and Wetlands. The approved 30 metre variable environmental buffer and development limits are maintained through the applications, and no development is proposed within the natural heritage features or their associated protection areas. The environmental buffer has been designed to serve as a transition area between the proposed residential development and the significant woodland, thereby providing protection for these natural features and associated wildlife habitat. In addition, the buffer is proposed to be protected by a fence.

An Environmental Impact Assessment and Environmental Management Plan have been prepared by SCS in support of the conditionally approved Draft Plan of Subdivision, outlining restoration and management measures that will be

implemented to ensure no significant impacts occur to the natural features and to ensure that these features are appropriately monitored and protected. The Environmental Impact Assessment and Environmental Management Plan are under review by the reviewing departments and agencies through the on-going Detailed Design process for the conditionally approved Draft Plan of Subdivision.

The proposed amendments continue to support the PPS objectives for efficient development within settlement areas while maintaining the long-term protection of natural heritage features. It is our opinion that the proposed OPA and ZBA are consistent with the applicable policies of the PPS.

City of London Official Plan "London Plan"

The Official was adopted by City Council on June 23, 2016 and was adopted by the Ministry of Municipal Affairs and Housing on December 28, 2016. At the time of preparing this letter, the most recent version of the document available was the January 2026 consolidation, which has been considered in the context of the proposed amendments. The Official Plan is a municipal policy document that guides economic, environmental and community building decisions to guide and manage growth. The Official Plan promotes compact forms of development to address the rising costs of infrastructure and the preservation of natural areas.

Map 1 (Place Types) identifies the northern portion of the subject property, subject to the conditionally approved Draft Plan of Subdivision, as being located within the Urban Growth Boundary and designates the lands as *Green Space* and *Neighbourhoods*. The southern portion of the subject property is located outside of the Urban Growth Boundary and is designated *Farmland*. The proposed amendments are not applicable to the southern portion of the subject property.

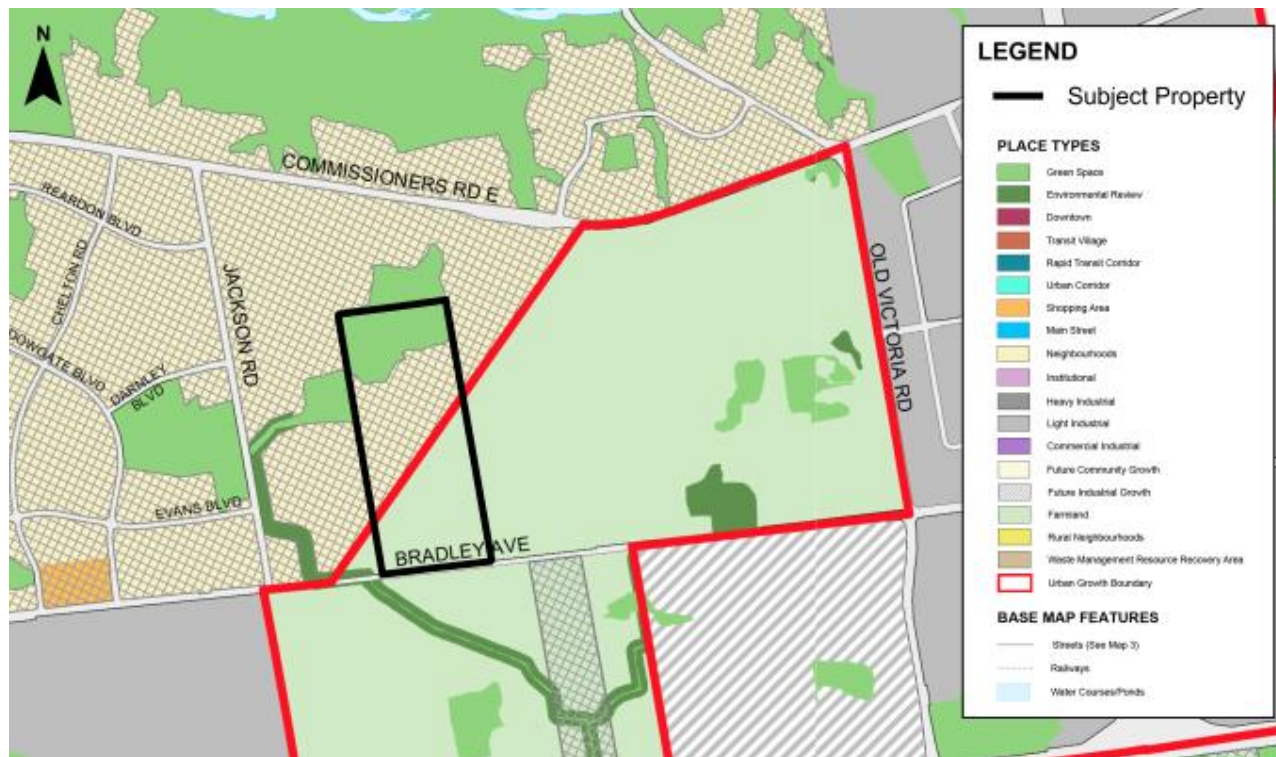


Figure 3: Map 1 – Place Types

The purpose of the OPA application is to redesignate a portion of the lands from the *Neighbourhoods* designation to the *Green Space* designation and a portion from the *Green Space* designation to the *Neighbourhoods* designation, as illustrated in the enclosed Draft OPA instrument (Figure 3). This amendment will reflect the creation of a linear boundary, permitting a variable buffer, as determined through the Detailed Design process, between the rear lot lines of the proposed single detached dwellings along the northern portion of the property and the open space area further to the north.



Figure 3: Draft Official Plan Amendment Schedule

Green Space

Policies 757–774 describe the general objectives, components, and permitted uses for the *Green Space* designation. The proposed OPA amendment does not alter the overall vision or land use structure established through the conditionally approved Draft Plan of Subdivision and continue to maintain the integrity of the *Green Space* designation by proposing an appropriate variable environmental buffer and associated mitigation measures that have been supported by the reviewing departments and agencies through the Detailed Design process of the conditionally approved Draft Plan of Subdivision. These details are further established through the Environmental Impact Study

and Environmental Management Plan prepared by SLR. No development is proposed within the *Green Space* designation, and the identified natural heritage features have been appropriately protected. The revised boundary continues to provide an appropriate transition between the future residential community and the natural heritage system, in accordance with the objectives of the Official Plan.

Neighbourhoods

Policies 916–960 of the Official Plan outline the general intent, objectives, and permitted uses within the *Neighbourhoods* designation. These policies aim to create a strong sense of place, provide a range of housing options, and support well-connected, livable communities. Policies 937–959 further emphasize an approach to intensification that supports infill and development on underutilized lands, particularly where existing servicing and infrastructure are available.

The proposed OPA amendment also maintains the intent of the *Neighbourhoods* designation by improving the configuration of the northern residential lots without changing the approved housing mix, development pattern, or development design. The conditionally approved Draft Plan of Subdivision will continue to conform to the objectives and policies of the Official Plan, as it introduces a mix of housing types on an underutilized site, provides neighbourhood connections, and contributes to a high quality of life for future residents without negatively impacting the surrounding area.

Summary

The proposed OPA represents a minor refinement to an already conditionally approved Draft Plan of Subdivision and continues to conform to the applicable policies of the Official Plan respecting urban growth, neighbourhood development, and natural heritage protection. The proposed revisions to the northern *Neighbourhoods* designation limit will facilitate a more consistent and efficient lot pattern while maintaining an appropriate environmental buffer, supporting the long-term protection of the natural heritage features and the livability of the future residential community. Additionally, the OPA supports an appropriate transition between the *Neighbourhoods* and *Green Space* areas through a design that respects the environmental features while maintaining connectivity between the future neighbourhood and the natural areas.

City of London Zoning By-law No. Z.-1

ZBL Z-1 as amended by By-law No. Z.-1-243222, zones the subject property as:

- *Holding Residential R1 Special Provision (h-17*R1-3(26));*
- *Holding Residential R6 Special Provision (h-17*R6-5(105));*
- *Holding Residential R4 Special Provision (h-17*R4-6(20));*
- *Open Space 1 (OS1);*
- *Open Space 5 (OS5);*
- *Urban Reserve (UR4); and,*
- *Agricultural (AG1) (Figure 7).*

The *Residential* zones include site-specific permissions for the residential development proposed through the conditionally approved Draft Plan of Subdivision. The *Open Space* (“OS5”) *Zone* consists of the environmental area, located within the northern portion of the subject property, and its associated buffer. The *Holding Residential R1*

*Special Provision (h-17*R1-3(26)) Zone borders the Open Space ("OS5") Zone to the south. This is illustrated in Figure 4.*

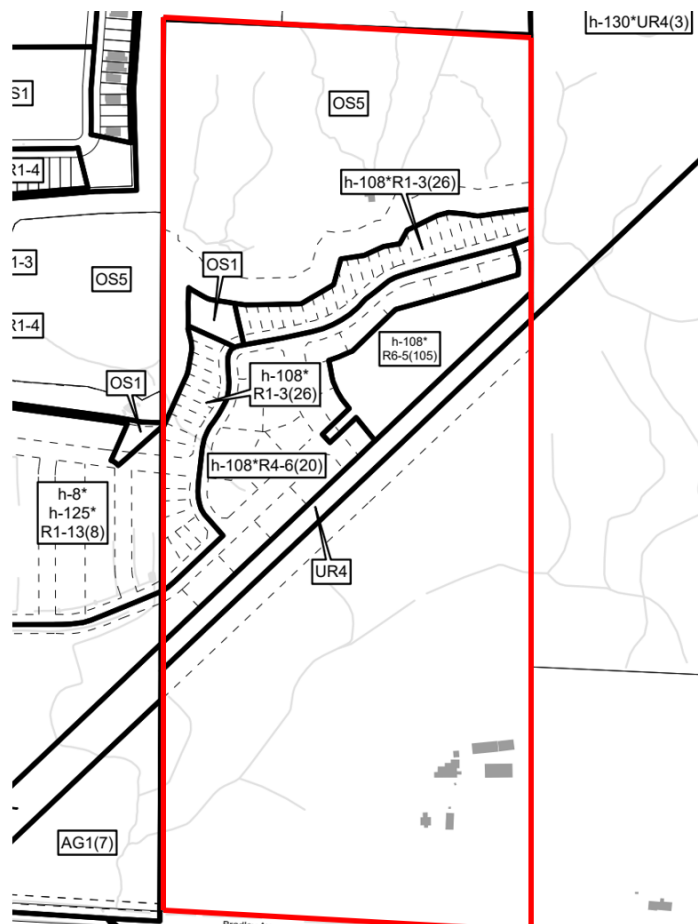


Figure 4: Zoning By-law No. Z.-1 Schedule A (Key Map 113)

The proposed ZBA seeks to amend Schedule "A" of ZBL Z-1 and rezone a portion of the lands from the *Holding Residential R1 Special Provision (h-17*R1-3(26)) Zone* to the *Open Space (OS5) Zone* and a portion from the *Open Space (OS5) Zone* to the *Holding Residential R1 Special Provision (h-17*R1-3(26)) Zone*, as illustrated in Figure 5. In line with the OPA, this amendment is required to reflect the creation of a linear boundary, permitting a variable buffer, as determined through the Detailed Design process, between the rear lot lines of the proposed single detached dwellings along the northern portion of the property and the open space area further to the north.

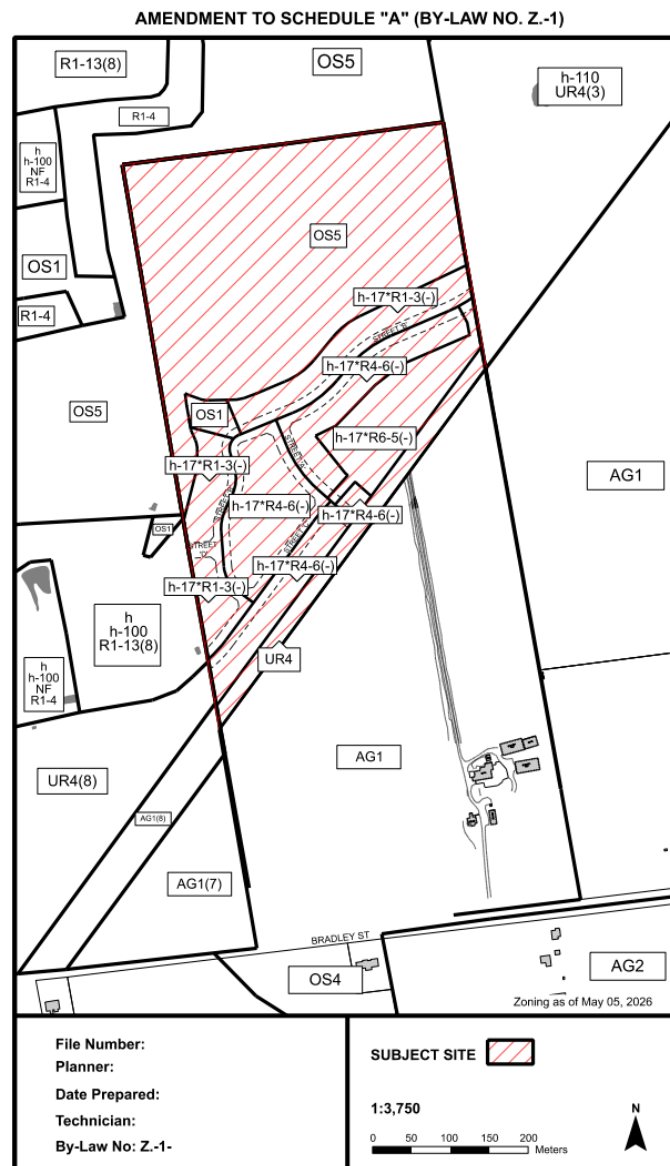


Figure 4: Draft Official Plan Amendment Schedule

This amendment is technical in nature and does not propose any changes to the permitted uses or definitions of the applicable zones but rather adjusts the zoning boundaries. The intent and purpose of both zones will remain unchanged. The OS5 zone will continue to provide protected natural space and maintain an appropriate buffer from the residential area, while the residential zone will continue to accommodate residential uses in conformity with the applicable zoning provisions. Please refer to the enclosed Draft ZBA for further details.

Upper Thames River Conservation Authority

The subject property is partially located within the regulated area of the UTRCA. The UTRCA regulates hazard lands, including watercourses, valleylands, shorelines, wetlands, and lands adjacent to these features, pursuant to the Conservation Authorities Act. During the Draft Plan of Subdivision review process, the UTRCA reviewed the proposed Draft Plan of Subdivision and associated buffer area and provided acceptance of the proposed variable 30 metre buffer. Conditions to be met by the applicant for the UTRCA will be addressed through the on-going Detailed Design process.

Public Consultation Strategy

In accordance with the requirements of the *Planning Act*, a Public Consultation Strategy is required for the OPA and ZBA applications and will be undertaken through a public planning process.

Once the applications have been deemed complete, they will be scheduled for a Statutory Public Meeting before the Planning, Design and Development Committee. Once the meeting date has been confirmed, a notice sign will be posted on the subject property. The notice sign will identify the date, time, and location of the public meeting, summarize the submitted applications, and provide contact information for members of the public wishing to submit written comments regarding the applications.

In addition, City staff will circulate notice of the meeting to all property owners within 120 metres (400 feet) of the subject property. Notice will also be posted on the City's website and made available through local media postings.

At the Statutory Public Meeting, all interested parties will have the opportunity to express comments, concerns, and opinions through deputations, which will form part of the public record. The applicant will work collaboratively with City Staff to address, where possible, any concerns raised through the public consultation process. Comments and input received will be reviewed by the applicant, and any appropriate revisions to the proposed amendments may be incorporated through subsequent resubmissions.

We trust that the foregoing Public Consultation Strategy is satisfactory and consistent with the requirements of provincial legislation. Weston Consulting remains committed to facilitating additional public engagement, if required.

Conclusions

The proposed OPA and ZBA applications represent minor technical refinements required to implement the conditionally approved Draft Plan of Subdivision and reflect the Detailed Design work completed in consultation with City staff. The applications do not alter the approved development concept, land use pattern, density, housing supply, servicing strategy, or natural heritage protection measures. The proposed amendments have been informed by technical review, including environmental investigations, and maintain the environmental protection measures established through the Environmental Impact Study and Environmental Management Plan. The approved buffer has been modified while maintaining the long-term ecological function of these lands, while ensuring that no development is proposed within the *Green Space* lands or natural heritage features.

It is our opinion that the proposed amendments represent good planning, have appropriate regard for the matters of provincial interest identified in the *Planning Act*, are consistent with the PPS, conform to the intent and policies of Official Plan, and appropriately implement ZBL Z-1. The applications refine the limits of the *Neighbourhoods* and *Green Space* designations and their corresponding zones while preserving the environmental, community, and land use planning objectives that have been established through previous approvals.