

Report to Planning and Environment Committee

To: Chair and Members
Planning and Environment Committee

From: Scott Mathers, MPA, P. Eng.
Deputy City Manager, Planning and Economic Development

Subject: Sifton Properties Limited
2331 Kilally Road and 1588 Clarke Road
File Number: OZ-9244, Ward 3
Public Participation Meeting

Date: April 30, 2024

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of Sifton Properties Limited relating to the properties located at 2331 Kilally Road and 1588 Clarke Road:

- (a) the proposed by-law attached hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting on May 14, 2024 to amend the Official Plan, The London Plan to:
- i) REVISE Map 1 – Place Types – to redesignate a portion of the subject lands **FROM** a Neighbourhoods Place Type **TO** a Green Space Place Type.
 - ii) REVISE Map 3 – Street Classifications - to **ADD** Neighbourhood Connector and Civic Boulevard street classifications;
 - iii) REVISE Map 5 – Natural Heritage - to **AMEND** the limits of the Environmentally Significant Area (ESA) boundary;
 - iv) **ADD** a new Specific Policy to the Neighbourhoods Place Type on the westerly portion of the subject lands to permit triplexes, fourplexes, stacked townhouses, low-rise apartments, small-scale community facilities, emergency care establishments, and rooming houses, and to permit a maximum height of six (6) storeys or 20 metres;
 - v) **ADD** the westerly portion of the subject lands to Map 7 – Specific Policy Areas;
- (b) the proposed by-law attached hereto as Appendix "B" **BE INTRODUCED** at the Municipal Council meeting on May 14, 2024 to amend Zoning By-law No. Z.-1, in conformity with the Official Plan, The London Plan as amended in part (a) above, to change the zoning of the subject lands **FROM** an Urban Reserve (UR4) Zone, an Urban Reserve/Temporary (UR4•T-56) Zone and a Holding Urban Reserve (h-2•UR4) Zone **TO** a Holding Residential R1 (h-17•h-100•R1-4) Zone; a Holding Residential R1 Special Provision (h-17•h-100•R1-4(21)) Zone; a Holding Residential R1/Residential R3 Special Provision (h-17•h-100•R1-3/R3-1(*)) Zone; a Holding Residential R1/Residential R3 Special Provision/Residential R4 Special Provision (h-17•h-100•R1-1/R3-1(**)/R4-6(_)) Zone; a Holding Residential R1/Residential R3 Special Provision/Residential R4 Special Provision (h-17•h-100•R1-2/R3-1(**)/R4-6(_)) Zone; a Holding Residential R3/Residential R4 Special Provision/Residential R5/Residential R6/Residential R7/Residential R8 (h-17•h-100•R3-3/R4-6(_)/R5-7/R6-5/R7•H20•D100/R8-4•H20•D100) Zone; an Open Space (OS1) Zone; and an Open Space (OS4/OS5) Zone; and an amendment to Subsection 4.21 of the Zoning By-law General Provisions to delete the street classification of Kilally Road, 200 metres east of Clarke Road, as a 'Proposed Arterial';

- (c) The Planning and Environment Committee **REPORT TO** the Approval Authority the issues, if any, raised through the application review process for the property located at 2331 Kilally Road and 1588 Clarke Road. In addition, the Site Plan Approval Authority **BE REQUESTED** to consider the following design issues through the site plan process:
- i) A noise impact assessment and appropriate attenuation measures are incorporated into the design of future residential development blocks with exposure to road noise on Clarke Road;
- (d) The Approval Authority **BE ADVISED** that Municipal Council supports issuing draft approval of the proposed plan of residential subdivision subject to draft plan conditions recommended by the Approval Authority, submitted by Sifton Properties Limited, prepared by Monteith Brown Planning Consultants (Project No. 12-824), certified by Jason Wilband O.L.S., dated February 29, 2024, **as red-line amended**, which shows a total of thirteen (13) low density residential blocks; eight (8) low-medium density residential street townhouse blocks; three (3) large medium density residential blocks; six (6) park blocks; one (1) future development block; one (1) block for Stormwater Management (SWM) Pond; seven (7) road widening and reserve blocks; served by a neighbourhood connector and several neighbourhood streets (Kilally Road extension and Streets A, B, C, D & E).

Executive Summary

Summary of Request

The request is to amend The London Plan and Zoning By-law Z.-1 to facilitate the development of a residential plan of subdivision with a range and mix of low density single detached, semi-detached, triplex and fourplex dwellings, various forms of cluster dwellings, townhouses and street townhouse dwellings, low-rise apartment buildings, parkland, multi-use pathways and a stormwater management facility, served by six (6) public streets.

This Official Plan amendment, Zoning amendment and Draft Plan of Subdivision will add approximately **570 to 1,115** new residential dwelling units in the City of London. The range is presented as the applicant has come forward with a variety of zones that includes a range of housing choices.

Purpose and Effect of Recommended Action

The purpose and effect of the recommended action is for Municipal Council to approve the recommended Official Plan and Zoning By-law Amendments to permit the range of uses, intensity and form associated with the proposed plan of subdivision, which is being considered by the Approval Authority.

Linkage to the Corporate Strategic Plan

Housing and Homelessness - A well planned and growing community.

Wellbeing and Safety – London has safe, vibrant, and healthy neighbourhoods and communities.

Analysis

1.0 Background Information

1.1 Previous Reports Related to this Matter

April 19, 2021 – Report to Planning and Environment Committee – Kilally South, East Basin, Environmentally Significant Area (1918 to 2304 and 2005 to 2331 Kilally Road) - Public Participation Meeting.

September 18, 2023 – Report to Planning and Environment Committee – Demolition Request for the Heritage Listed Property at 1588 Clarke Road - Public Participation Meeting.

1.2 Planning History

Demolition Permit Application - 1588 Clarke Road

An application for demolition of the farm dwelling at 1588 Clarke Road was considered at a Planning and Environment Committee meeting on September 18, 2023. At the Council meeting held on September 26, 2023, Municipal Council resolved: That, on the recommendation of the Director, Planning and Development, with respect to the demolition request for the heritage listed property located at 1588 Clarke Road:

- a) the Chief Building Official BE ADVISED that Municipal Council consents to the demolition of the built resources on the property;
- b) the property located at 1588 Clarke Road BE REMOVED from the Register of Cultural Heritage Resources; and,
- c) the property owner BE ENCOURAGED to commemorate the historic contributions of the Tackabury family in the future development of this property;

Sifton Properties Limited and their consultants have brought forward several suggestions for commemoration of the history of the property and dwelling, including interpretive plaques and panels, dedicating a location in a park or open space block for an interpretive sign, or consideration of naming a street, public walking trail, or SWM pond feature after the family. These suggestions and others will be considered further as the subdivision development proceeds through the detailed planning and design process.

Kilally South, East Basin Municipal Class Environmental Assessment

In August 2020, a report was received by the Civic Works Committee recommending the Kilally South, East Basin Municipal Class Environmental Assessment be accepted. The purpose of this Municipal Class EA was to evaluate potential stormwater servicing alternatives in the Kilally South, East Basin catchment area to service future neighbourhood developments planned for lands within the area of Clarke Road and Kilally Road in northeast London.

The study area consisted of approximately 124 hectares of predominantly agricultural, rural residential, and open space lands. The preferred stormwater management strategy was to create two infiltration and attenuation SWM facilities and one dry attenuation SWM facility with LIDs (Low Impact Development solutions). SWM Facility 1 (identified as an Open Space block on the subdivision draft plan) is proposed to be a dry infiltration pond providing water quantity and water balance control to residential development within the study area east of Clarke Road.

As part of its motion to accept the Municipal Class EA, Municipal Council directed Civic Administration to initiate an Official Plan Amendment and Zoning By-law Amendment to implement the recommendations of the Subject Lands Status Report and Environmental Impact Study (EIS) prepared in conjunction with the Municipal Class EA (File No. OZ-9275). A report was brought forward to the Planning and Environment Committee on April 19, 2021 recommending the City-initiated amendments to establish the ESA boundaries and unevaluated wetland and vegetation patch delineations identified in the EIS.

Clarke Road Improvements - Environmental Study Report

On June 25, 2019, Municipal Council passed a motion to accept the Clarke Road Improvements Schedule C Municipal Class Environmental Assessment and direct the City Clerk to file a notice of study completion. The study area for this Class EA included the Clarke Road corridor from its intersection with the recently completed Veterans Memorial Parkway/Fanshawe Conservation Area access road to Fanshawe Park Road East.

Widening Clarke Road to provide additional through lanes, cycling facilities, pedestrian pathways and intersection improvements was identified by the study as the preferred solution to accommodate future travel demands. The recommended road widening along Clarke Road consists of widening the road to accommodate four lanes, with consideration to an ultimate build out to six lanes. The 2021 Development Charges Background Study Update indicates the Clarke Road – Veterans Memorial Parkway Extension to Fanshawe Park Road (2 to 4 through lanes) is currently anticipated to commence construction in 2033.

Veterans Memorial Parkway Interchange Environmental Assessment

The Veterans Memorial Parkway Interchange Environmental Assessment was undertaken by the City in 2008 as a long-term planning exercise to identify interchange locations along the entire length of the Veterans Memorial Parkway from Wilton Grove Road to Kilally Road. The VMP EA identified a future interchange (modified single point diamond) at the intersection of Clarke Road/VMP/Fanshawe Conservation Area entrance road, and a future flyover at the intersection of Kilally Road and Clarke Road.

Kilally Road Design – Growth Management Implementation Strategy (GMIS)

In addition to the SWM facilities discussed above, other infrastructure projects planned through the GMIS and DC background studies to service future growth and development in this area include an oversized sanitary sewer along Kilally Road extending from just west of Sandford Street to Clarke Road, extension of a new municipal watermain along Kilally Road to Clarke Road, and a two-lane upgrade of Kilally Road between Webster and Sandford. The sanitary sewer is proposed to outlet through the Edge Valley – Phase 2 subdivision being developed by Drewlo Holdings Inc. An application for draft plan of subdivision for the Phase 2 lands is expected to be submitted very shortly. As part of Staff's discussions with the development industry during the annual GMIS update, the City is looking to advance projects in this area to accelerate growth within the Urban Growth Boundary.

1.3 Property Description

The site consists mostly of tableland with cultivated fields above a steep, vegetated slope along the Thames River to the northeast. An older farm dwelling and several outbuildings previously occupied the northwest corner of the property at 1588 Clarke Road together with a small area of deciduous trees and vegetation cover. A single detached bungalow previously occupied the north end of the property at 2331 Kilally Road. The dwelling and accessory outbuildings including a garage, small barn and shed, and an inground swimming pool have recently been removed.

1.4 Current Planning Information

- The London Plan Place Type – “Neighbourhoods” and “Green Space”
- Existing Zoning – Urban Reserve UR4, Urban Reserve UR4/Temporary (T-56), Holding Urban Reserve (h-2•UR4), and Open Space OS5

1.5 Site Characteristics

- Current Land Use – rural residential, agriculture, and open space
- Frontage – approx. 395 metres on Kilally Road
- Depth – approx. 530 metres
- Area – approx. 27.8 hectares
- Shape – Irregular

1.6 Surrounding Land Uses

- North – rural residential, open space, Thames River, aggregate resource extraction and accessory asphalt/concrete batching plant north of the river
- East – conservation area, outdoor recreation, and open space
- South – open space, conservation area entrance, future industrial
- West – hydro transmission corridor, Clark Road/Veterans Memorial Parkway, existing agriculture, and future residential development lands

1.7 Location Map



LOCATION MAP

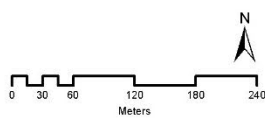
Address: 2331 Kilally Road and 1588 Clarke Road

File Number: OZ-9244/39T-20502

Planner: Larry Mottram

Date: 2024/03/28

Corporation of the City of London
Prepared By: Planning and Development



Scale 1:6000

Legend

-  Subject Site
-  Assessment Parcels
-  Submitted Under Review Subdivisions

2.0 Discussion and Considerations

2.1 Development Proposal

The proposed residential subdivision consists of a mix of low density single detached and semi-detached dwellings, various forms of cluster dwellings, townhouse and street townhouse dwellings, low-rise apartment buildings, parkland, multi-use pathways and a stormwater management facility, served by six (6) public streets. The draft plan in front of Committee and Council has undergone several revisions over the course of this application process in terms of revised block configurations and road layout, and adjustments to the limits of the draft plan. The most recent submission consists of thirteen (13) low density residential blocks; eight (8) low-medium density residential street townhouse blocks; three (3) large medium density residential blocks; six (6) park blocks; one (1) future development block; one (1) block for Stormwater Management (SWM) Pond; seven (7) road widening and reserve blocks; served by a neighbourhood connector and several neighbourhood streets.

The Official Plan and Zoning By-law Amendments and Draft Plan of Subdivision application was first accepted on July 16, 2020, there have been several revisions and resubmissions made (March 2021, May 2022 and August 2023) in order to address issues and concerns raised through the departmental/agency circulations. As noted above, the internal road network, block configuration and sizing, park and pathway alignments, and zoning have been revised several times. One of the main challenges during the application review process has been provision for an acceptable second public road access to serve the subdivision from the south.

2.2 Requested Amendments

Requested Official Plan (The London Plan) Amendments

Map 1 – Place Types to redesignate certain lands from “Neighbourhoods” to “Green Space” to align with the proposed park and open space uses.

Map 4 * – Active Mobility Network to incorporate the proposed alignment for the Thames Valley Parkway.

Map 5 – Natural Heritage to revise the limits of the ESA to reflect the findings of the Environmental Impact Study (EIS) completed in support of the proposed Draft Plan of Subdivision application.

Map 6 ** – Hazards and Natural Resources to redesignate the Maximum Hazard Line.

* The TVP multi-use pathway extension along the north branch of the Thames River will be applied to Map 4 at such time as the planned routing of the pathway is finalized. Map 4 currently shows a cycling and walking route at a conceptual level. The park/pathway blocks meet the intent of Map 4 and conform with the Active Mobility policies supporting walking and cycling. Therefore, it is staff’s opinion that an amendment to Map 4 will not be necessary.

** As per The London Plan policies (1493_ and 1500_) the Erosion Hazard Limits identified on Map 6 are subject to interpretation and refinement without an amendment to the Plan based on technical studies prepared in conformity with the Maximum Hazard Line policies and to the satisfaction of the City and UTRCA. A Geotechnical Investigation and Slope Stability Assessment was submitted and has been reviewed by City and UTRCA in conjunction with the application review.

Requested Zoning Amendments

Possible Amendment to Zoning By-law Z.-1 to change the zoning from an Urban Reserve UR4 Zone, an Urban Reserve/Temporary (UR4•T-56) Zone, and a Holding Urban Reserve (h-2•UR4) Zone to:

- Residential R1 (R1-4) Zone – to permit single detached dwellings on lots with a minimum lot area of 360 square metres and minimum lot frontage of 12 metres;
- Residential R1 Special Provision (R1-4(21)) Zone – to permit single detached

dwellings on lots with a minimum lot area of 360 square metres and minimum lot frontage of 12 metres, together with a special provision for a dwelling setback from a high-pressure pipeline of 20 metres (minimum);

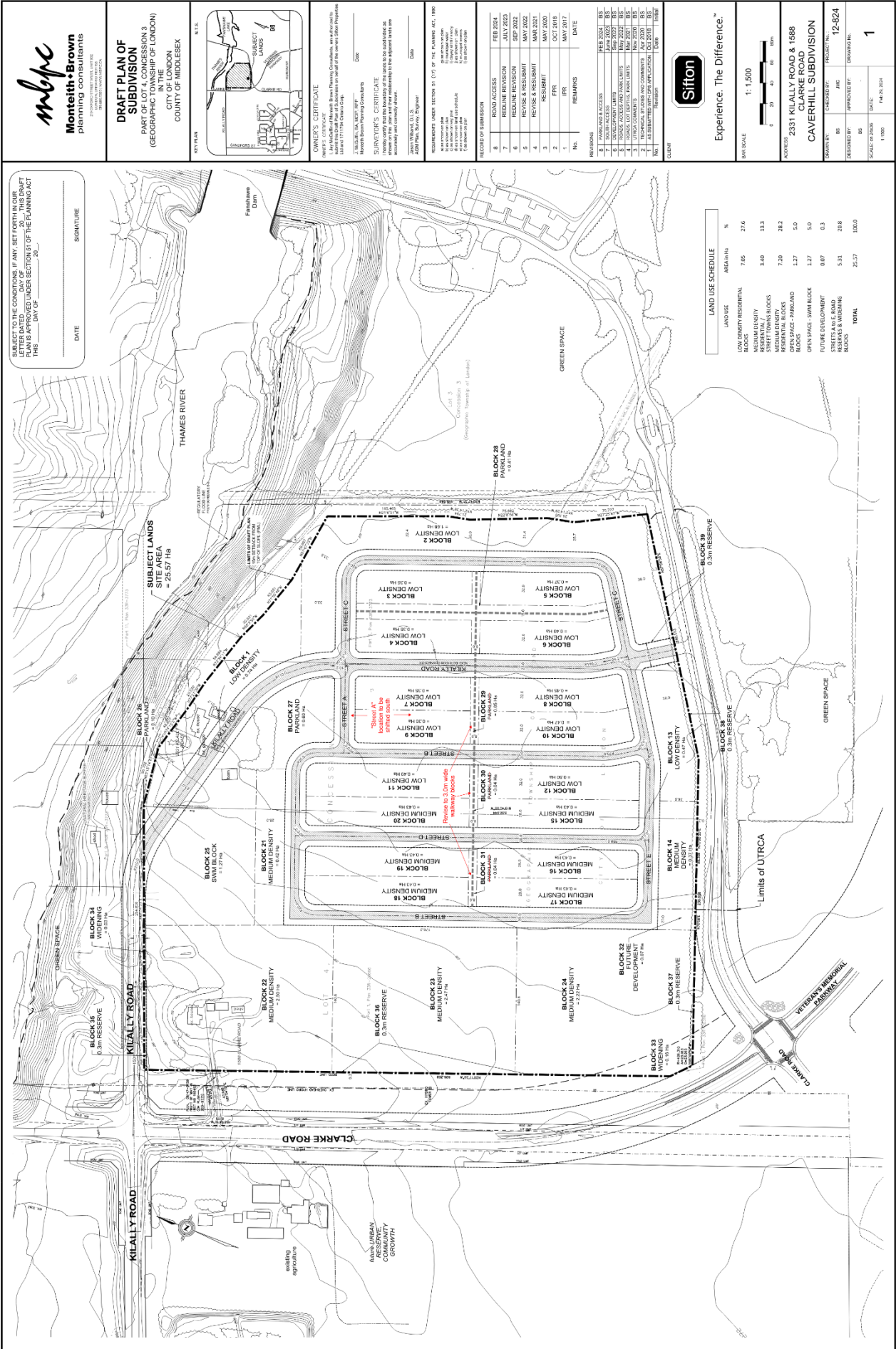
- Residential R1/Residential R3 (R1-3/R3-1) Zone – to permit single detached dwellings on lots with a minimum lot area of 300 square metres and minimum lot frontage of 10.0 metres; in addition to a range of dwelling types including semi-detached, duplex, triplex and fourplex dwellings;
- Residential R1/Residential R3/Residential R4 Special Provision (R1-1/R3-1/R4-6(*)) Zone – to permit single detached dwellings on lots with a minimum lot area of 250 square metres and minimum lot frontage of 9.0 metres; a range of dwelling types including semi-detached, duplex, triplex and fourplex dwellings; and street townhouses with a minimum lot area of 145 square metres per unit and a minimum lot frontage of 5.5 metres per unit, together with a special provision for a lot coverage of 50 percent (maximum);
- Residential R1/Residential R3/Residential R4 Special Provision (R1-2/R3-1/R4-6(*)) Zone – to permit single detached dwellings on lots with a minimum lot area of 300 square metres and minimum lot frontage of 9.0 metres; a range of dwelling types including semi-detached, duplex, triplex and fourplex dwellings; and street townhouses with a minimum lot area of 145 square metres per unit and a minimum lot frontage of 5.5 metres per unit, together with a special provision for a lot coverage of 50 percent (maximum);
- Residential R3/Residential R4/Residential R5/Residential R6/Residential R7 Special Provision/Residential R8 Special Provision/Residential R9 Special Provision (R3-3/R4-6/R5-7/R6-5/R7•H20•D100(*)/R8-4•H20•D100(*)) Zone – to permit a broad range of dwelling types such as single detached, semi-detached, duplex, triplex and fourplex dwellings; street townhouse dwellings; townhouses and stacked townhouses up to a maximum density of 60 units per hectare and maximum height of 12 metres; various forms of cluster housing including single detached, semi-detached, duplex, triplex, fourplex, townhouse, stacked townhouse, and apartment buildings up to a maximum density of 35 units per hectare and maximum height of 12 metres; senior citizen apartment buildings, handicapped persons apartment buildings, nursing homes, retirement lodges, continuum-of-care facilities, and emergency care establishments up to a maximum density of 100 units per hectare and maximum height of 20 metres; apartment buildings, stacked townhouses, and lodging house class 2 up to a maximum density of 100 units per hectare and maximum height of 20 metres;
- Open Space OS1 Zone – to permit such uses as conservation lands, conservation works, golf courses, public and private parks, recreational buildings associated with conservation lands and public parks, campgrounds, and managed forests; and,
- Open Space OS4/OS5 Zone – to permit conservation lands, conservation works, golf courses without structures, public and private parks without structures, cultivation or use of land for agricultural/horticultural purposes, and passive recreation uses which include hiking trails and multi-use pathways.

Holding (h-108 and h-109) provisions have been requested to be applied to the R1-1/R3-1/R4-6(*) Zone proposed for Medium Density Block 14 and to the Future Development Block 32 to ensure these parcels are developed in conjunction with abutting lands, to the satisfaction of the City, prior to removal of the holding symbols.

The following table summarizes the special provisions that have been proposed by the applicant and those that are being recommended by Staff.

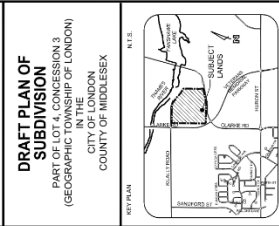
Blocks	Zone	Special Provisions
Blocks 4, 6, 7 & 8	R3-1(*)	<ul style="list-style-type: none"> Prohibited Use: Fourplex dwellings (Staff recommended)
Blocks 9 – 21 & 32	R3-1(**)	<ul style="list-style-type: none"> Prohibited Uses: Triplex dwellings; Fourplex dwellings (Staff recommended)
Blocks 9 – 24 & 32	R4-6(_)	<ul style="list-style-type: none"> Lot Frontage (Minimum): 6.7 metres per unit; (Staff recommended) Lot Coverage (Maximum): 50 percent (Applicant requested)
Blocks 22 - 24	R7*H20*D100 R8-4*H20*D100	<ul style="list-style-type: none"> Maximum height: 20 metres; Maximum density: 100 units per hectare (both Applicant requested)

2.3 Proposed Draft Plan of Subdivision



monteith brown
Monteith·Brown
 planning consultants

DRAFT PLAN OF SUBDIVISION
 PART OF LOT 4, CONCESSION 3
 (GEOGRAPHIC TOWNSHIP OF LONDON)
 IN THE
 CITY OF LONDON
 COUNTY OF MIDDLESEX



OWNER'S CERTIFICATE
 I, the undersigned, being the owner of the land shown on the plan of subdivision, do hereby certify that the boundaries of the lands to be subdivided are correctly shown on the plan of subdivision, and that the same are correctly shown on the plan of subdivision.

SURVIVOR'S CERTIFICATE
 I, the undersigned, being the survivor of the persons named in the certificate of the owner of the land shown on the plan of subdivision, do hereby certify that the boundaries of the lands to be subdivided are correctly shown on the plan of subdivision, and that the same are correctly shown on the plan of subdivision.

REVISIONS

No.	REVISIONS	DATE
1	ISSUED	MAY 2017
2	REVISED	OCT 2018
3	REVISED	MAY 2020
4	REVISED & RESUBMIT	MAR 2021
5	REVISED & RESUBMIT	MAY 2022
6	REVISED	NOV 2022
7	REVISED	NOV 2022
8	REVISED	NOV 2022
9	REVISED	NOV 2022
10	REVISED	NOV 2022
11	REVISED	NOV 2022
12	REVISED	NOV 2022
13	REVISED	NOV 2022
14	REVISED	NOV 2022
15	REVISED	NOV 2022
16	REVISED	NOV 2022
17	REVISED	NOV 2022
18	REVISED	NOV 2022
19	REVISED	NOV 2022
20	REVISED	NOV 2022
21	REVISED	NOV 2022
22	REVISED	NOV 2022
23	REVISED	NOV 2022
24	REVISED	NOV 2022
25	REVISED	NOV 2022
26	REVISED	NOV 2022
27	REVISED	NOV 2022
28	REVISED	NOV 2022
29	REVISED	NOV 2022
30	REVISED	NOV 2022
31	REVISED	NOV 2022
32	REVISED	NOV 2022
33	REVISED	NOV 2022
34	REVISED	NOV 2022
35	REVISED	NOV 2022
36	REVISED	NOV 2022
37	REVISED	NOV 2022
38	REVISED	NOV 2022
39	REVISED	NOV 2022

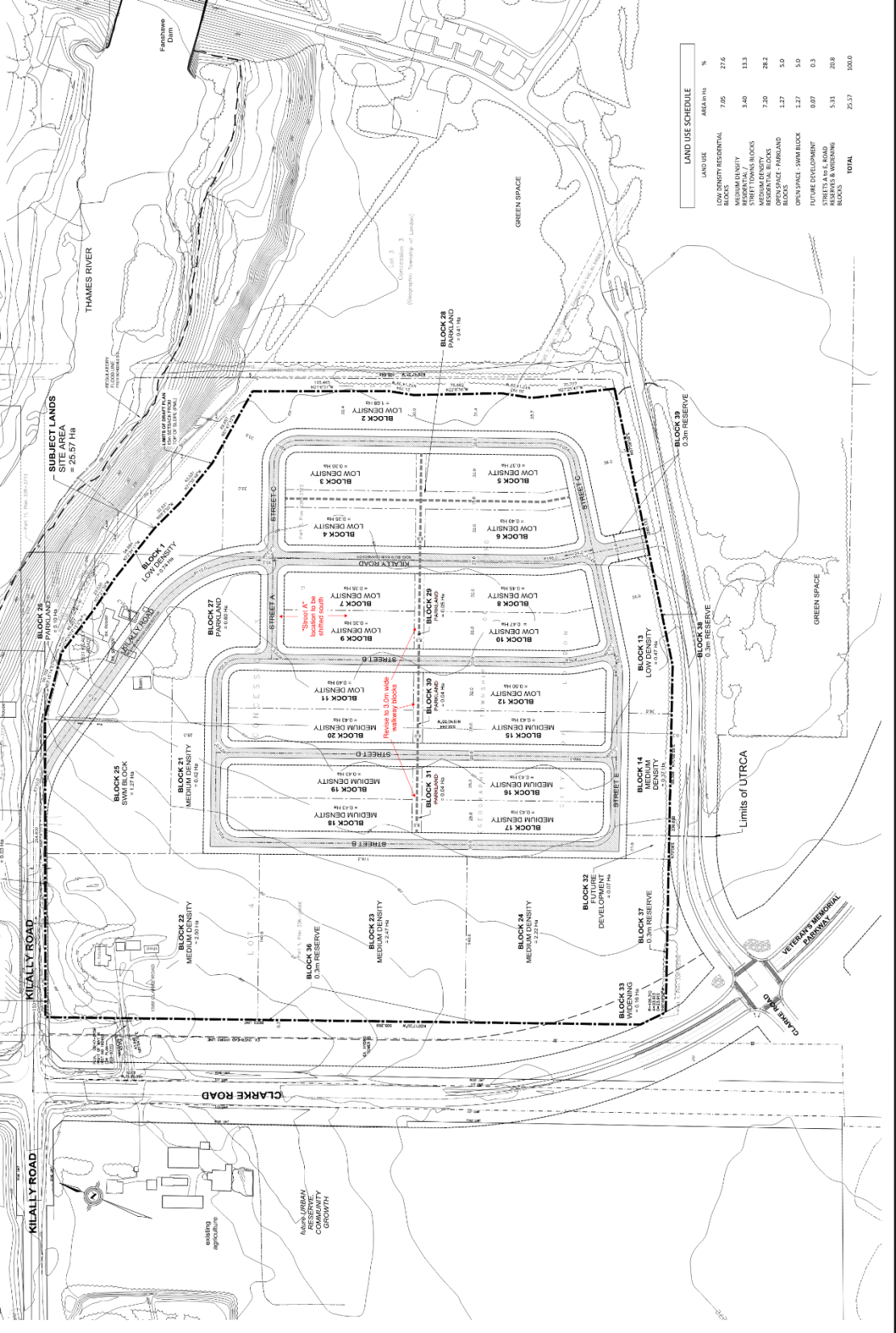
Sifton
 Experience. The Difference.™

2331 KILALLY ROAD & 1588 CAVERHILL SUBDIVISION

DRAWN BY: BS
 CHECKED BY: BS
 DESIGNED BY: BS
 SCALE OF PLAN: 1:1000
 DATE: 14th JULY 2024
 PROJECT No.: 12-824
 DRAWING No.: 1

SUBJECT TO THE CONDITIONS, IF ANY, SET FORTH IN OUR LETTER DATED _____ DAY OF _____ 20____. THIS DRAFT PLAN IS APPROVED UNDER SECTION 51 OF THE PLANNING ACT 1990 ON _____ DAY OF _____ 20____.

DATE: _____
 SIGNATURE: _____



2.4 Community Engagement (see more detail in Appendix C)

2.4.1 Public Comments

Two (2) telephone inquiries and seven (7) written responses were received from the public. In addition, there were five (5) email requests for clarification and further information. The main concerns expressed are summarized below in italics with Staff's responses to these concerns:

- *Concerns with subdivision access from Kilally Road, the increased traffic, impacts on privacy, treed slopes and natural environment.*

Kilally Road east of Clarke Road will require widening and upgrading to a fully serviced public road to service the proposed subdivision. The alignment of the future extension of Kilally Road through the subdivision must also meet the City's design standards which provides for a minimum of 110 metres centerline radii for a Neighborhood Connector. The subdivision road layout has undergone several revisions, in particular revisions to the alignment and location of the main Neighbourhood Connector which must ensure that a future public road connection to the south will have sufficient separation distance to protect for the future Clark Road/VMP interchange. The minimum offset spacing between an interchange and intersection should be 400 metres in accordance with the Veteran's Memorial Parkway Interchange EA and the City's Access Management Guidelines. Consideration must also be given in the subdivision design to protecting for the future Kilally Road "fly-over" of the VMP in terms of road widening dedications, grade separation, and access restrictions. It is expected that a section of the treed slope on the north side of Kilally Road will be impacted because of required upgrades and eventual construction of the fly-over. However, in terms of traffic and privacy impacts on the existing residence north of Kilally Road, the curvature of the road has been re-aligned to meet minimum standards which has shifted the road connection further to the west from what had been previously shown.

- *Concerns for how driveway access to the existing residential property on Kilally Road will be maintained and made safe.*

The subdivider will be required to demonstrate how access for the existing property at 2304 Kilally Road will be maintained in a safe manner. This will be addressed as part of the conditions of draft plan approval, and details of the driveway access will be reviewed in conjunction with the engineering drawings and subdivision agreement.

- *Protection for an existing aggregate operation in the area from incompatible development that could otherwise hinder or preclude its expansion and continued use.*

The aggregate operation is located north of the Thames River, separated from the subject lands by an open space corridor that is approximately 300 to 400 metres wide and heavily forested. A noise feasibility study was prepared by HGC Engineering Ltd. (March 2020) and submitted with the application which undertook a screening assessment of potential noise impacts from existing commercial/industrial activities in the surrounding area. The report indicates this operation is located greater than 300 metres from the site, outside the potential influence area for Class II facilities per the Ministry of the Environment, Conservation and Parks (MECP) D6 guidelines and therefore unlikely to cause significant impact.

- *Potential noise and visual impacts from the existing aggregate operation and asphalt plant on medium density residential development blocks. Request site-specific noise and visual impact studies be completed; and,*
- *Impact from fugitive fumes and odours from nearby asphalt production facilities.*

When details of the medium density development blocks closest to Clarke Road are available, a detailed noise study providing acoustic recommendations for the blocks will

be performed. As noted in the above recommendation clause, the Site Plan Approval Authority will be requested to ensure noise impact assessments are undertaken and appropriate attenuation measures are incorporated into the design of future residential developments. The Noise Feasibility Study also recommends warning clauses be used to inform future residents of potential traffic noise issues and the presence of nearby commercial/industrial facilities. As part of the preparation of conditions of draft plan approval for the proposed subdivision, staff will draft site-specific warning clauses to inform future occupants for all residential lots and blocks in the subdivision of the nearby aggregate operation and asphalt plant.

- *Concern for potential PCB contaminated soils on-site.*

This concern was reviewed with staff from the City's Engineering and Environmental Services Department and an email response was provided to the resident early in the process. Most of the historical PCB related impacts are known to have been identified in the Pottersburg Creek and Walker Drain to the south. City staff are not aware of any data records or other information that would suggest migration of PCB contaminants as far north as the subject lands at 1588 Clarke Road and 2331 Kilally Road.

The subject lands are located approximately a kilometre away from the former Westinghouse property and have historically been used for residential and agricultural uses. Intervening land uses on the east side of Clarke Road are characterized by agricultural and a mix of small-scale industrial, commercial, and institutional uses closer to Huron Street. The recently extended Veteran's Memorial Parkway now traverses the area to connect with Clarke Road, just south of the main entrance to Fanshawe Conservation Area.

Given the history of land use on the subject lands, adjacent land uses, and distance from the former Westinghouse property, there was no reason to suspect soils contamination or require a Record of Site Condition as part of a complete application submission.

2.4.2 UTRCA Landowner Comments:

The main concerns expressed from the Conservation Authority are summarized below in italics with Staff's responses to these concerns:

- ***Permanent Subdivision Access*** - *The UTRCA owns approximately 470 metres of laneway from the Clarke Road/Veterans intersection (City owned right-of-way) to the Fanshawe Conservation Area gatehouse. The proposed secondary access to the subdivision will result in a significant reduction to the Authority's laneway and therefore negative impacts on our daily operations. In order to ensure these impacts are negated, relocation of the gatehouse needs to be evaluated. A preliminary list of impacts that could arise as a result of gatehouse relocation are as follows:*
 - i. Insufficient stacking and proper queueing for patrons visiting the Conservation Area;*
 - ii. Costs associated with the relocation of all servicing, including but not limited to roads/paving, hydro, water, gas, telecommunication, lighting, sanitary/septic, etc.*
 - iii. Increased traffic and flow due to residents utilizing roadway and services offered at the Conservation Area;*
 - iv. The Memorial Forest and tree-lined laneway may be impacted should the gatehouse relocation result in a revised laneway location; and,*
 - v. The historic entrance pillars may need to be re-aligned.**Request third party consultants be retained to determine feasibility of this alternative and to study the various options, including servicing needs, architectural/engineering, geotechnical report, cultural heritage and archaeological assessment, ecological opinion letter, and other studies as deemed necessary, completed to the satisfaction of the UTRCA, and at no cost to the UTRCA.*

As part of the Conditions of Draft Plan Approval, Planning and Development staff are supportive of a condition that prior to final approval of any portion of the subdivision plan above 80 units, the Owner shall retain a qualified consultant to complete a study of the entrance configuration to Fanshawe Conservation Area, including options for relocating the gatehouse, traffic congestion issues and patterns, and road design, in consultation with and to the satisfaction of the City and the UTRCA. Multiple studies will likely be required, and the onus should not be placed on the UTRCA or City to carry the burden for the costs of these studies.

- ***Temporary Subdivision Access for Construction*** – Concerns regarding the impact construction will have on the daily functions of the Conservation Authority business should a temporary construction access be allowed in the southwesterly extent of the subdivision. Also, concerns should this temporary access be utilized during the subdivision build-out.

The recent revised version of the draft plan of subdivision shows a 20m wide future development block (Block 32) intended for the purpose of providing temporary access at the southwest corner of the subject lands. The draft plan is expected to be red-line revised to remove the block based on Planning and Development Staff's position that a second access at this location should not be assumed to be acceptable at this time, as a permanent second access is planned 400 metres from the intersection of Clarke/VMP as per the Veteran's Memorial Parkway Interchange EA.

- ***Municipal Street*** – Concerns regarding the impact of municipal street name and property address changes on the UTRCA Watershed Conservation Centre and Fanshawe Conservation Area.

Staff do not foresee a change to the current street name and municipal property addressing. The recently re-aligned Clark Road continues a short distance east of the new intersection of Clark Road and VMP terminating at the UTRCA property limits. It is the future northerly extension of Veterans Memorial Parkway to Fanshawe Park Road that will likely replace Clarke Road over the long term and result in municipal address changes affecting existing property parcels further to the north.

- ***Encroachment, Connection and Fencing*** – Concerns that fencing be placed along all property boundaries adjacent to UTRCA owned lands to reduce encroachment into naturalized areas and private lands.

Requirements for the installation of fencing along the property boundaries adjacent the UTRCA owned land will be implemented through the conditions of draft plan approval and the Subdivision Agreement.

- ***Land Conveyance*** – Concerns regarding a narrow buffer strip along the rear yards on the eastern extent of the subdivision adjacent UTRCA owned lands. Trespassing, encroachment, and maintenance issues. Is it the proponent's intent to convey this strip of land to the UTRCA?

This narrow strip of remnant land is outside the limits of the draft plan of subdivision and proposed to be retained by the landowner. It was included in the zoning amendment application as it provides an open space buffer to a natural heritage feature and naturalized woodland, as well as providing separation distance from the Sun-Canadian pipeline easement. The recommended zoning is a compound Open Space (OS4/OS5) Zone. The EIS recommends the buffer be enhanced with native tree and shrub plantings to increase the density of vegetation cover between the residential development and the woodland ESA. As part of the conditions of draft plan approval, continuous chain link fencing without gates will be required for all residential lots backing onto this open space strip. As the strip of land is proposed to be retained by the owner, they will have the full responsibility for maintaining it.

2.5 Policy Context

The Planning Act, 1990 and The Provincial Policy Statement, 2020

The Provincial planning policy framework is established through the Planning Act (Section 3) and the Provincial Policy Statement, 2020 (PPS). The Planning Act requires that all municipal land use decisions affecting planning matters shall be consistent with the PPS.

The mechanism for implementing Provincial policies is through the Official Plan, The London Plan. Through the preparation, adoption and subsequent approval of The London Plan, the City of London has established the local policy framework for the implementation of the Provincial planning policy framework. As such, matters of provincial interest are reviewed and discussed in The London Plan analysis below.

As the application for Official Plan and Zoning By-law amendments is consistent with the general intent and purpose of The London Plan, it is staff's opinion that the application is consistent with the Planning Act and the PPS.

The London Plan, 2016

The London Plan constitutes the Official Plan for the City of London, prepared and enacted under the authority of the provisions of Part III of the *Planning Act, R.S.O. 1990, c. P. 13*. It contains goals, objectives, and policies established primarily to manage and direct physical change and the effects on the social, economic, and natural environment of the city.

Neighbourhoods Place Type

The proposed subdivision lands are located within the Neighbourhoods Place Type which permits a range of low-density residential uses including single detached, semi-detached, duplex, and townhouse dwellings for properties fronting on Neighbourhood Streets. Additional uses may be permitted including triplexes and small-scale community facilities on properties fronting a Neighbourhood Connector (Table 10). Heights between one (1) and three (3) storeys are permitted (Table 11).

An Official Plan amendment is proposed to amend Map 1 – Place Types to apply the Green Space Place Type to recognize open space uses, such as a SWM facility, neighbourhood park, and multi-use pathway that are proposed within the subdivision plan. Staff recommend an amendment to Map 3 – Street Classifications which would add a Neighbourhood Connector aligned with the future extension of Kilally Road through the subdivision plan, as well as adding a Civic Boulevard to a short section of public right-of-way east of the intersection of Clarke Road and Veterans Memorial Parkway which are classified as Urban Thoroughfare and Expressway, respectively. This intersection is also identified on Map 3 as a future Interchange.

An amendment to Map 5 – Natural Heritage would delineate the ESA boundary in the northeast portion of the subject lands based on the recommendations of the Environmental Impact Study (EIS) and EIS Addendum. The ESA boundary line as currently shown adjacent the Thames River will be expanded further south to include a portion of table lands above the top of slope. A natural heritage buffer on the agricultural tableland adjacent the ESA boundary is proposed to be re-naturalized with native trees and shrubs, and native seed mix.

An Official Plan amendment is also recommended to add a Specific Policy to the Neighbourhoods Place Type and Map 7 – Specific Policy Areas for the westerly portion of the subdivision lands which are adjacent an existing hydro transmission corridor and future Clarke Road/VMP which is classified on Map 3 as a future Expressway. The specific policy area would permit the multi-family development blocks within this portion of the subdivision to be developed for a mix of low and medium density residential uses such as triplexes, fourplexes, townhouses, street townhouses, stacked townhouses,

and low-rise apartments, and allow for increased density and building height up to 6 storeys (20 metres).

Criteria for Specific Policy Areas

The London Plan includes conditions for evaluating the appropriateness of Specific Area Policies where the applicable Place Type policies would not accurately reflect the intent of City Council with respect to a specific site or area (TLP 1729-1734).

The following conditions apply when considering a new Specific Policy Area:

1. The proposal meets all other policies of the Plan beyond those that the specific policy identifies.
2. The proposed policy does not have an adverse impact on the integrity of the place type policies or other relevant parts of this Plan.
3. The proposed use is sufficiently unique and distinctive such that it does not establish an argument for a similar exception on other properties in the area.
4. The proposed use cannot be reasonably altered to conform to the policies of the place type.
5. The proposed policy is in the public interest and represents good planning.

Staff are of the opinion that the proposed Specific Policy Area conforms to the evaluation criteria as discussed under Key Issues and Considerations section below.

Evaluation of Planning and Development Applications

The London Plan also includes evaluation criteria for all planning and development applications with respect to use, intensity and form, as well as with consideration of the following (TLP 1577-1579):

1. Consistency with the Provincial Policy Statement and all applicable legislation.
2. Conformity with the Our City, Our Strategy, City Building, and Environmental policies.
3. Conformity with the Place Type policies.
4. Consideration of applicable guideline documents.
5. The availability of municipal services.
6. Potential impacts on adjacent and nearby properties in the area and the degree to which such impacts can be managed and mitigated.
7. The degree to which the proposal fits within its existing and planned context.

Staff are of the opinion that all the above criteria have been satisfied, and that appropriate zones and special provisions have been applied.

3.0 Financial Impact/Considerations

Through the completion of the works associated with this application, fees, development charges and taxes will be collected. There will be increased operating and maintenance costs for works being assumed by the City.

4.0 Key Issues and Considerations

4.1 Use

Map 1 – Place Types identifies the subject lands being within the Neighbourhoods Place Type which permits a range of low-density residential uses including single detached, semi-detached, duplex, and townhouse dwellings for properties fronting on Neighbourhood Streets. Additionally, triplexes and small-scale community facilities may be permitted on properties fronting a Neighbourhood Connector, in accordance with Table 10 of The London Plan. Kilally Road extending through the subdivision is proposed to be classified as a Neighbourhood Connector. The balance of the road network is comprised of Neighbourhood Streets.

Below is a summary of the recommended zoning and permitted uses by block number and street classification:

Low Density Residential Blocks 1, 2, 3 & 5 (fronting on a Neighbourhood Connector and Neighbourhood Street) - Residential R1 (R1-4) Zone to permit single detached dwellings on lots with a minimum lot area of 360 square metres and minimum lot frontage of 12 metres. A portion of Block 2 is proposed to be zoned Residential R1 Special Provision (R1-4(21)) with a special provision to incorporate the standard safety setback from a high-pressure pipeline of 20 metres (minimum). This is recommended as a precautionary measure recognizing the presence of the Sun-Canadian pipeline easement on adjacent lands to the east.

Low Density Residential Blocks 4, 6, 7 & 8 (fronting on a Neighbourhood Connector) - Residential R1/Residential R3 Special Provision (R1-3/R3-1(*)) Zone to permit single detached dwellings on lots with a minimum lot area of 300 square metres and minimum lot frontage of 10.0 metres. The R3-1(*) Zone permits a range of dwelling types including single detached, semi-detached, duplex, and triplex dwellings. Fourplex dwellings would be removed from the list by a special provision in the zoning as Table 10 does not permit this use specifically on a Neighbourhood Connector, except in Central London and lands fronting on higher order street classifications.

Low Density Residential Blocks 9, 10, 11, 12 & 13 (fronting on Neighbourhood Streets) - Residential R1/Residential R3 Special Provision/Residential R4 Special Provision (R1-2/R3-1(**)/R4-6()) Zone to permit single detached dwellings on lots with a minimum lot area of 300 square metres and minimum lot frontage of 9.0 metres. The R3-1(*) Zone would permit a range of dwelling types including single detached, semi-detached, and duplex dwellings. However, triplex and fourplex dwellings would be removed through a special provision as Table 10 does not permit these uses on a Neighbourhood Street. Street townhouses are permitted, and a special provision R4-6() Zone is recommended that would include the requested lot coverage of 50 percent (maximum) allowing a slightly higher coverage than the current regulation of 45 percent; as well as a minimum lot frontage of 6.7 metres per unit rather than the current 5.5 metres minimum. The increased frontage has been recommended by staff to ensure adequate separation of underground utility and servicing connections to the street for street fronting townhouses.

Medium Density Residential Blocks 14, 15, 16, 17, 18, 19, 20, & 21 (fronting on Neighbourhood Streets) - Residential R1/Residential R3 Special Provision/Residential R4 Special Provision (R1-1/R3-1(**)/R4-6()) Zone to permit single detached dwellings on lots with a minimum lot area of 250 square metres and minimum lot frontage of 9.0 metres. The block depths are somewhat shallower at 28 metres and suitable for smaller single detached lots. Triplex and fourplex dwellings would be removed through a special provision as Table 10 does not permit these uses on a Neighbourhood Street. Street townhouses are permitted, and a special provision R4-6() Zone is recommended that would include the requested lot coverage of 50 percent (maximum) as well as a minimum lot frontage of 6.7 metres per unit instead of 5.5 metres consistent with the City's engineering requirements as recommended above.

Medium Density Residential Blocks 22, 23 & 24 (fronting on a Neighbourhood Street) - Residential R3/Residential R4/Residential R5/Residential R6/Residential R7 Special Provision/Residential R8 Special Provision (R3-3/R4-6/R5-7/R6-5/R7•H20•D100/R8-4•H20•D100) Zone to permit a broad range and mix of residential types recognizing the development potential of these large blocks which range from 2.2 to 2.5 hectares in size. Permitted uses, densities and heights would include single detached, semi-detached, duplex, triplex and fourplex dwellings; street townhouse dwellings; townhouses and stacked townhouses up to a maximum density of 60 units per hectare and maximum height of 12 metres; various forms of cluster housing including single detached, semi-detached, duplex, triplex, fourplex, townhouse, stacked townhouse, and apartment buildings up to a maximum density of 35 units per hectare and maximum height of 12 metres; senior citizen apartment buildings, handicapped persons apartment buildings, nursing homes, retirement lodges, continuum-of-care facilities, and emergency care establishments up to a maximum density of 100 units per hectare and

maximum height of 20 metres; apartment buildings, stacked townhouses, and lodging house class 2 up to a maximum density of 100 units per hectare and maximum height of 20 metres.

Recognizing the westerly portion of the subdivision lands are located adjacent an existing hydro transmission corridor and future Clarke Road/VMP expressway, a site-specific policy amendment to the Neighbourhoods Place Type policies is considered appropriate and would permit triplexes, fourplexes, stacked townhouses, low-rise apartments, small-scale community facilities, emergency care establishments, and rooming houses in addition to the uses identified in Table 10 for properties fronting on a Neighbourhood Street.

SWM Block 25 and Park Blocks 26, 27 & 28 - Open Space OS1 Zone to permit such uses as conservation lands, conservation works, golf courses, public and private parks, recreational buildings associated with conservation lands and public parks, campgrounds, and managed forests. The uses are consistent with the requested amendment to Map 1 – Place Types to apply the Green Space Place Type to recognize active recreational and open space uses within the subdivision plan which include a SWM facility, neighbourhood park, and multi-use pathway system.

Remnant Lands Outside of the Draft Plan Limits - Open Space OS4/OS5 Zone to permit conservation lands, conservation works, golf courses without structures, public and private parks without structures, cultivation, or use of land for agricultural/horticultural purposes, and passive recreation uses which include hiking trails and multi-use pathways. The zoning also implements the proposed amendment to Map 5 – Natural Heritage which delineates the ESA boundary in the northeast portion of the subject lands based on the recommendations of the Environmental Impact Study (EIS) and EIS Addendum. The ESA boundary line as currently shown adjacent the Thames River will be shifted further south to include a portion of table lands above the top of slope. A natural heritage buffer on the agricultural tableland adjacent the ESA boundary is proposed to be re-naturalized with native trees and shrubs, and native seed mix.

Overall, the recommended zoning and range of permitted uses are considered appropriate and compatible with existing and future land uses in the surrounding area, consistent with the Provincial Policy Statement, and conform with the policies of The London Plan.

4.2 Intensity

Table 11 - Range of Permitted Heights in the Neighbourhoods Place Type, provides the range of permitted building heights based on street classification. Heights of between one (1) and three (3) storeys would be permitted on the Neighbourhood Connector and Neighbourhood Streets within the subdivision plan. The maximum height regulations in the recommended zoning for most of the residential blocks generally range from 9 to 12 metres within the range of height limits as provided in Table 11.

The three multi-family development blocks along the westerly limit of the subdivision will have frontage and access on the internal subdivision streets. Although separated by the hydro corridor, these blocks will also have exposure to potentially high volumes of traffic along Clarke Road and future Veterans Memorial Parkway. Allowing medium density forms and higher intensity of development is considered appropriate and aligns with policies in The London Plan for neighbourhood design and noise (TLP 1768_). These policies provide for residential uses with a medium to high level of intensity to be sited adjacent to higher order streets. This form of development provides for greater flexibility in building orientation thereby allowing front facing buildings with amenity space in the rear. These development blocks are subject to Site Plan Approval and Development Agreements which will ensure noise impact assessments are undertaken and appropriate attenuation measures are incorporated into the design of future residential developments. The location of the proposed subdivision in proximity to an existing transportation and hydro transmission infrastructure corridor makes the site sufficiently unique to warrant the proposed uses and intensity, and a specific area policy is therefore considered appropriate and in the public interest.

Overall Potential Lot/Unit Yield

Below is an estimate of the potential lot/unit yield range for all residential development blocks within the subdivision plan based on zoning and under different build-out scenarios:

Range	Number of Dwelling Type	Total Number of Lots/Units
Low	320 single detached lots 250 cluster housing units	570
Medium	188 single detached lots 178 freehold street townhouse 430 conventional townhouses	796
High	118 single detached lots 280 freehold street townhouses 717 apartment units	1,115

Under the “Low” scenario Blocks 1 – 21 could be developed for future single detached dwelling lots consistent with the recommended zoning, street pattern and block configuration. Blocks 22 - 24 would have zoning and be of sufficient size to support a variety of cluster forms of housing which may be attached or detached dwellings, with densities of approximately 35 units per hectare.

The “Medium” scenario envisions Blocks 1 – 13 being developed for future single detached lots and Blocks 14 – 21 for rows of street townhouse dwellings meaning a type of dwelling unit where each unit sits on a separate lot having legal frontage on a public street. Block 22 – 24 would be developed for conventional townhouses at an assumed density of 60 units per hectare.

The “High” scenario envisions Blocks 1 – 8 developing for single detached lots, Blocks 9 – 21 for street townhouses, and Blocks 22 - 24 for low-rise apartment buildings up to a maximum density of 100 units per hectare based on the ability of these larger parcels to support more intensive development. These blocks will be subject to future site plan approvals where design measures relating to building height, scale and massing can be reviewed and incorporated to provide a transition to uses of lesser intensity.

The height, scale and intensity of the proposed development is found to be appropriate within the context of the subdivision and adjacent surrounding lands.

4.3 Form

The proposed subdivision has been laid out on a modified grid pattern as contemplated by the City Building and Street Network policies of The London Plan. There are no cul-de-sacs or dead-ending streets except for the south end of Kilally Road extension where a road stub has been provided for a future public road access. The UTRCA owns the abutting lands to the south, which serves as their main access road to the entrance of Fanshawe Conservation Area and Watershed Conservation Centre. The road stub is approximately 400 metres distance from the signalized intersection and future interchange of Clarke Road and Veterans Memorial Parkway which meets the City’s minimum requirements for intersection spacing. Clarke Road currently extends a short distance of approximately 145 metres east of the intersection ending at the property limits of the UTRCA. The remainder of lands would need to be acquired from the UTRCA and dedicated as a future public road right-of-way.

As the policies require the neighbourhood street network and block sizes to be designed to ensure connectivity and support transit and active mobility, a series of pedestrian mid-block connections have been provided from east to west through the middle of the subdivision plan significantly enhancing neighbourhood connectivity and linkages. The widths of the blocks which are shown as parkland can be adjusted from 8.0 metres to 3.0 metres wide which will maintain their function as pedestrian corridors.

The other recommended adjustment is to shift Street 'A' further south to where Block 29 is shown at the mid-block location providing a public road connection to Kilally Road. This results in a slightly larger park with the amount of frontage on public streets reduced from three streets to two. The recommended revision continues to maintain the policy intent that parks and open spaces will be designed to be safe and open to casual public surveillance. Parks will have wide exposure to streets and rear-lot development onto parks shall be discouraged (TLP 422_1). The street layout here has been designed to allow for easy, safe, and attractive pedestrian access from all parts of the subdivision to the neighbourhood park (TLP 422_3). The park will serve as a focal point for neighbourhood residents and include such amenities as seating/gathering areas, multi-use play pad, basketball court, and pathway loops for the TVP multi-use pathway. The proposed alignment of the TVP is expected to enter along the south side of Kilally Road, traverse around the SWM facility and neighbourhood park, and continue on through a 15 metre open space corridor and ultimately connect with Fanshawe Conservation Area.

4.4 Holding Provisions

The holding (h-17) provision is recommended to be applied to the zoning for all residential lots and blocks within the proposed subdivision to ensure orderly development and adequate provision of municipal services. The "h-17" symbol shall not be deleted until full municipal sanitary sewer and water services are available to service the site. In addition, a holding (h-100) provision is recommended be applied to all residential development blocks in order to ensure there is adequate water service and appropriate access, a looped watermain system must be constructed and a second public access must be available. This would be achieved through completion of a public road connection to the subdivision from the south, satisfactory to the City of London. Permitted interim uses are allowed up to a maximum of 80 residential units.

Conclusion

The proposed Official Plan, Zoning By-Law Amendment and Draft Plan of Subdivision are consistent with the Provincial Policy Statement, 2020 which promotes densities for new housing which efficiently use land, resources, and infrastructure; and neighbourhood developments that foster social interaction, facilitate active transportation and community connectivity. The recommended amendments are also consistent with the general intent and purpose of The London Plan. Staff recommend approval of the amendments to facilitate the proposed draft plan of subdivision, subject to conditions of draft approval together with holding provisions in the zoning by-law.

Prepared by: Larry Mottram, MCIP, RPP
Senior Planner, Subdivision Planning

Reviewed by: Bruce Page, MCIP, RPP
Manager, Subdivision Planning

Recommended by: Heather McNeely, MCIP, RPP
Director, Planning and Development

Submitted by: Scott Mathers, MPA, P.Eng.
Deputy City Manager, Planning and Economic Development

cc: Peter Kavcic, Manager, Subdivisions and Development Inspections
Michael Harrison, Manager, Subdivision Engineering
Travis MacBeth, Manager, Planning Policy (Growth Management)
Michael Pease, Manager, Site Plans

SM/HM/BP/lm

Appendix A – Official Plan Amendment

Bill No. (Number to be inserted by
Clerk's Office)
2024

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

A by-law to amend the Official Plan,
The London Plan for the City of
London, relating to 2331 Kilally Road
and 1588 Clarke Road.

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

Amendment No. (to be inserted by Clerk's Office) to the Official Plan, The London Plan, for the City of London as contained in the text attached hereto and forming part of this by-law, is adopted.

This Amendment shall come into effect in accordance with subsection 17(27) of the *Planning Act, R.S.O. 1990, c.P.13*.

PASSED in Open Council on May 14, 2024 subject to the provisions of PART VI.1 of the *Municipal Act, 2001*.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading - May 14, 2024
Second Reading - May 14, 2024
Third Reading - May 14, 2024

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

A. PURPOSE OF THIS AMENDMENT

The purpose of this Amendment is to facilitate a proposed residential subdivision development by amending portions of the Neighbourhoods Place Type and applying a Green Space Place Type on Map 1; adding Neighbourhood Connector and Civic Boulevard on the street classifications Map 3; delineating the Environmentally Significant Area (ESA) boundary on Map 5; and adding a Specific Policy Area to Map 7 applying to the westerly portion of the subject lands to permit a broad range of dwelling types and allow for increased building height.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to lands located at 2331 Kilally Road and 1588 Clarke Road in the City of London as shown on "Schedule 1" attached hereto.

C. BASIS OF THE AMENDMENT

The subject of this amendment is a 26 hectare site located within the City's Urban Growth Boundary consisting of a former farmhouse and accessory buildings at 1588 Clarke Road, and a former rural estate dwelling at 2331 Kilally Road, with the balance of the lands made up of relatively flat, open fields. An application for approval of a draft plan of subdivision has been submitted for development of a proposed low-to-medium density residential subdivision (File No. 39T-20502).

The proposed amendment to Map 1 – Place Types is to apply the Green Space Place Type to recognize open space uses, such as a SWM facility, neighbourhood park, and multi-use pathway that are proposed for the subdivision plan. Map 3 – Street Classifications would be amended by adding a Neighbourhood Connector aligned with the future extension of Kilally Road through the subdivision plan, and by adding a Civic Boulevard to a short section of public right-of-way east of the intersection of Clarke Road and Veterans Memorial Parkway which are classified as Urban Thoroughfare and Expressway, respectively. This intersection is also identified on Map 3 as a future interchange.

An amendment to Map 5 – Natural Heritage would delineate the ESA boundary in the northeast portion of the subject lands based on the recommendations of the Environmental Impact Study (EIS) and EIS Addendum. The ESA boundary line as currently shown adjacent the Thames River will be shifted further south to include a portion of table lands above the top of slope. A natural heritage buffer on the agricultural tableland adjacent the ESA boundary is proposed to be re-naturalized with native trees and shrubs, and native seed mix.

Finally, a site-specific policy amendment to the Neighbourhoods Place Type policies is recommended for the westerly portion of the subdivision lands adjacent an existing hydro transmission corridor and future Clarke Road/VMP expressway. The specific policy area would permit the multi-family development blocks within the subdivision to be developed for a broad range of low and medium density residential uses and allow for some increased building height and density.

D. THE AMENDMENT

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

1. Map 1 - Place Types, to the Official Plan, The London Plan, for the City of London Planning Area is amended by redesignating a portion of the

subject lands from a Neighbourhoods Place Type to a Green Space Place Type, as indicated on “Schedule 2” attached hereto.

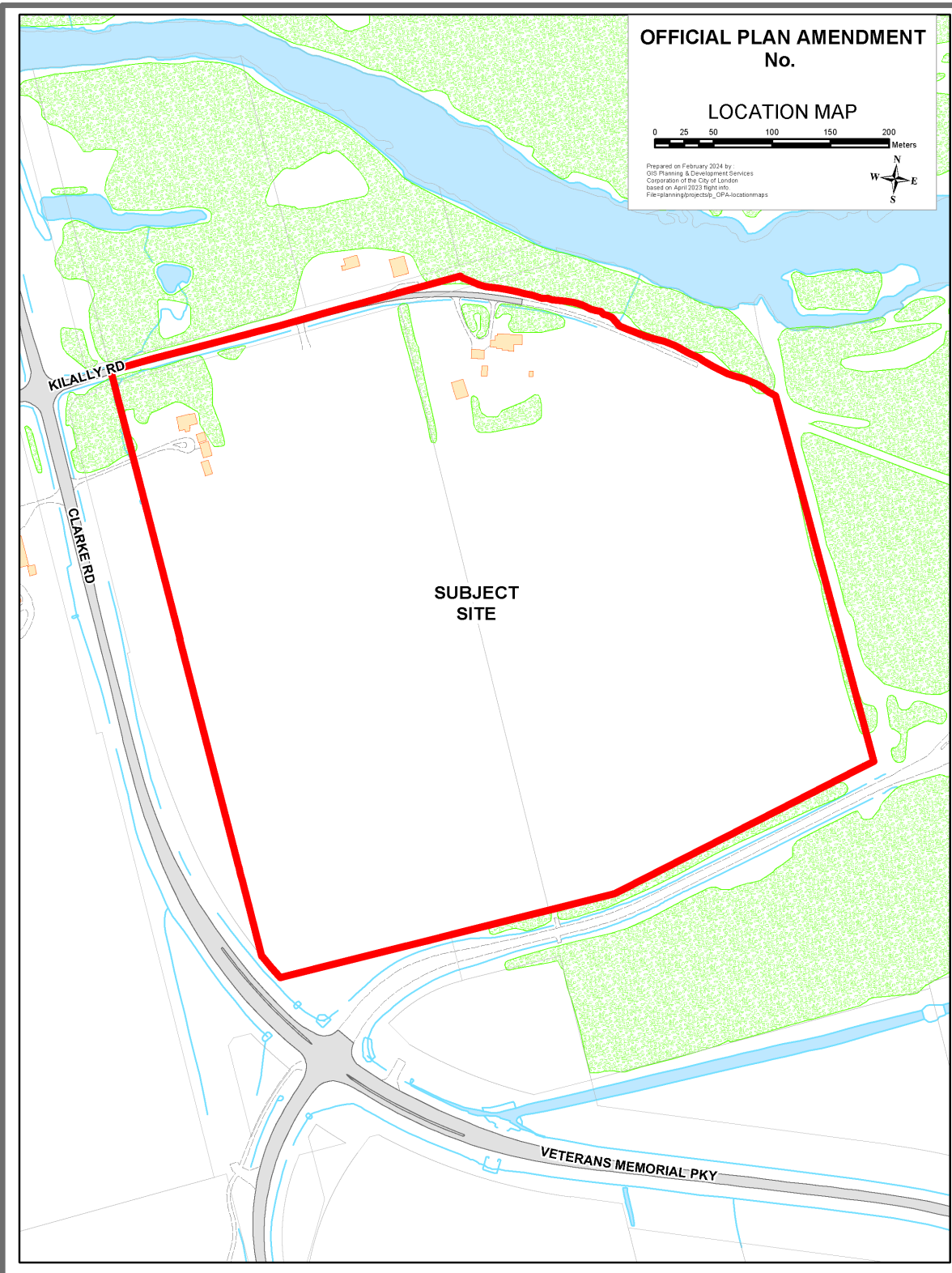
2. Map 3 – Streets Classification, to the Official Plan, The London Plan, for the City of London Planning Area is amended by adding Neighbourhood Connector and Civic Boulevard street classifications, as indicated on “Schedule 3” attached hereto.
3. Map 5 – Natural Heritage, to the Official Plan, The London Plan, for the City of London Planning Area is amended by delineating the limits of the Environmentally Significant Area (ESA) boundary, as indicated on “Schedule 4” attached hereto.
4. Specific Policies for the Neighbourhoods Place Type of the Official Plan, The London Plan, for the City of London is amended by adding the following:

() 2331 Kilally Road and 1588 Clarke Road

For the lands in the Neighbourhoods Place Type located at 2331 Kilally Road and 1588 Clarke Road, as shown on Map 7 – Specific Policy Areas, triplexes, fourplexes, stacked townhouses, low-rise apartments, small-scale community facilities, emergency care establishments, and rooming houses shall be permitted in addition to the uses identified in Table 10, with an upper maximum height of 6 storeys or 20 metres.

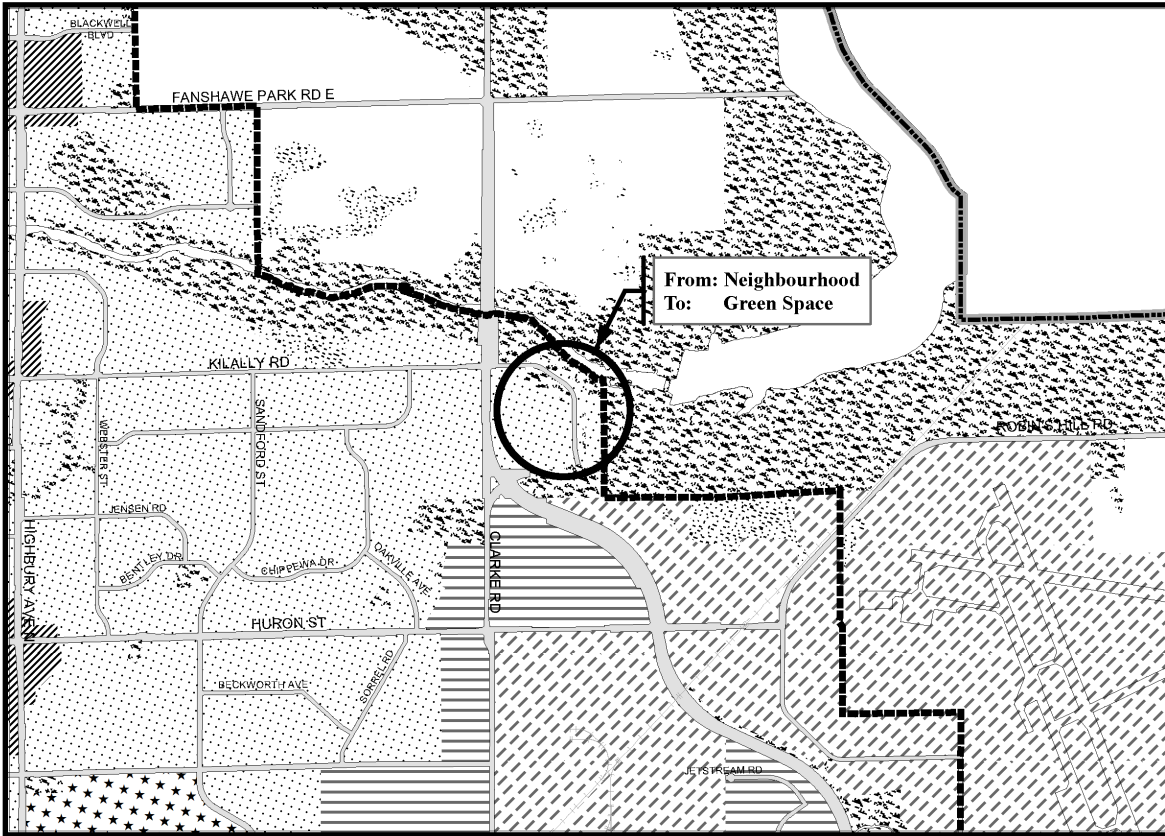
5. Map 7 - Specific Policy Areas, to the Official Plan, The London Plan, for the City of London Planning Area is amended by adding a Specific Policy Area along the westerly portion of the lands located at 2331 Kilally Road and 1588 Clarke Road in the City of London, as indicated on “Schedule 5” attached hereto.

“Schedule 1”



“Schedule 2”

AMENDMENT NO:



Legend

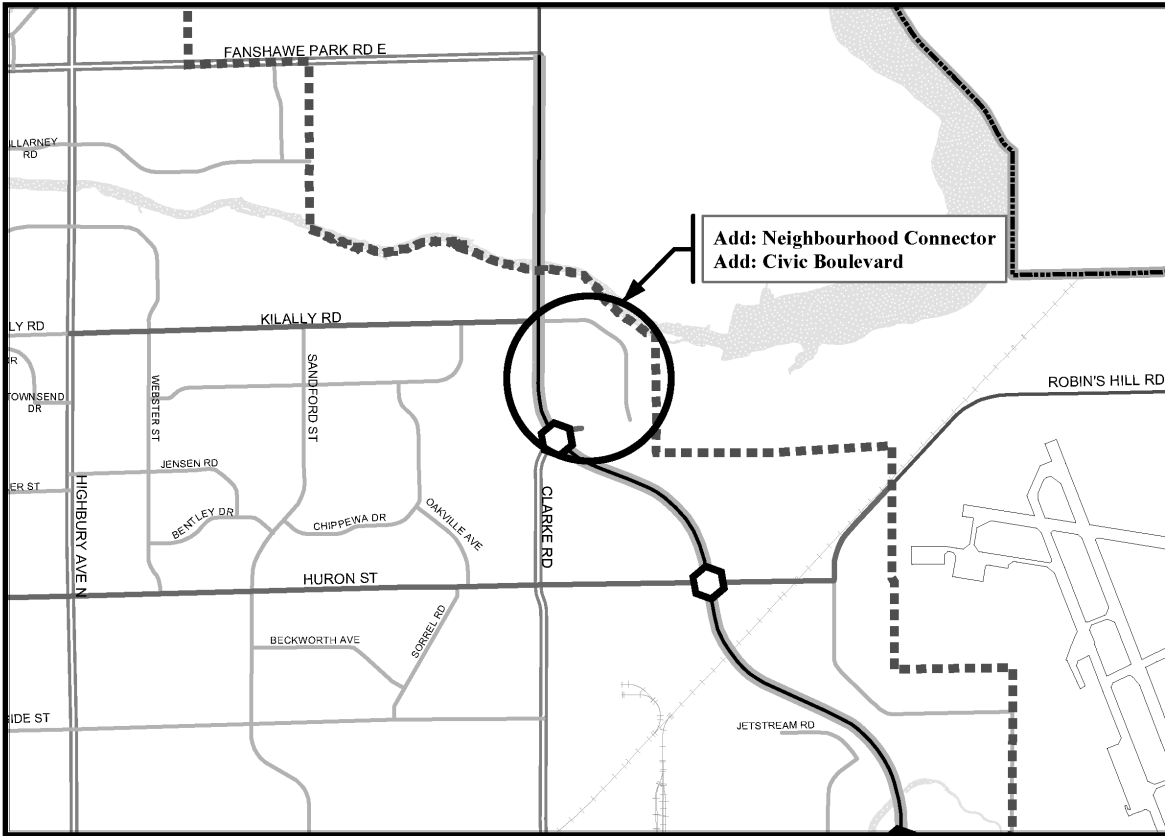
Downtown	Future Community Growth	Environmental Review
Transit Village	Heavy Industrial	Farmland
Shopping Area	Light Industrial	Rural Neighbourhood
Rapid Transit Corridor	Future Industrial Growth	Waste Management Resource Recovery Area
Urban Corridor	Commercial Industrial	Urban Growth Boundary
Main Street	Institutional	
Neighbourhood	Green Space	

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

<p>SCHEDULE 1 TO</p> <p>OFFICIAL AMENDMENT NO. _____</p> <p>PREPARED BY: Planning & Development</p>	<p>Scale 1:30,000</p> <p>Meters</p>	<p>FILE NUMBER: OZ-9244/39T-20502</p> <p>PLANNER: LM</p> <p>TECHNICIAN: RC</p> <p>DATE: 3/14/2024</p>
---	-------------------------------------	---

“Schedule 3”

AMENDMENT NO:



Legend

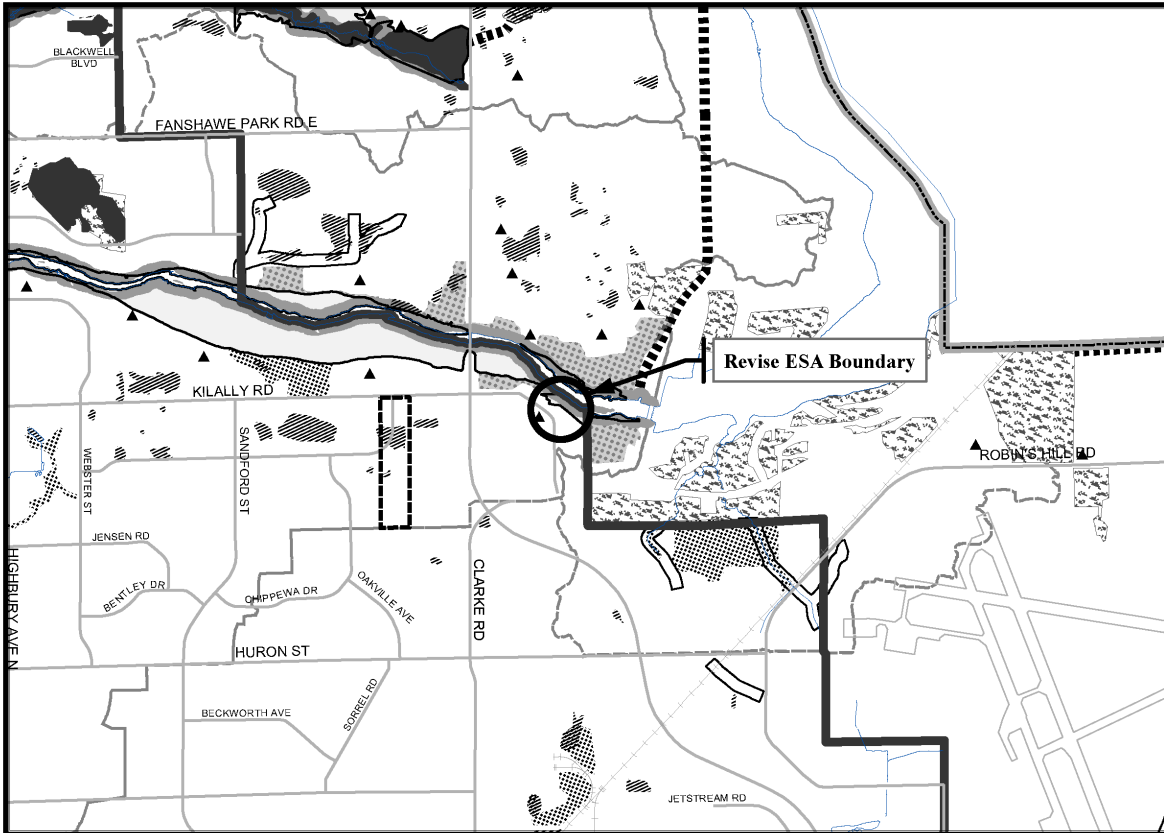
- | | | | | | |
|--|-------------------------|--|-------------------------|--|------------------------|
| | Provincial Highway | | Main Street | | Interchanges |
| | Expressway | | Neighbourhood Connector | | Rapid Transit Stations |
| | Urban Thoroughfare | | Rural Thoroughfare | | Urban Growth Boundary |
| | Rapid Transit Boulevard | | Rural Connector | | |
| | Civic Boulevard | | | | |

This is an excerpt from the Planning Division's working consolidation of Map 3 - Street Classifications of the London Plan, with added notations.

<p>SCHEDULE 2 TO</p> <p>OFFICIAL AMENDMENT NO. _____</p> <p>PREPARED BY: Planning & Development</p>	<p>Scale 1:30,000</p> <p>Meters</p>	<p>FILE NUMBER: OZ-9244/39T-20502</p> <p>PLANNER: LM</p> <p>TECHNICIAN: RC</p> <p>DATE: 3/14/2024</p>
---	-------------------------------------	---

“Schedule 4”

AMENDMENT NO:



NATURAL HERITAGE SYSTEM

- Provincially Significant Wetlands
- Wetlands
- Unevaluated Wetlands
- Significant Woodlands
- Woodlands
- Significant Valley Lands
- Valley Lands

- Areas of Natural and Scientific Interest
- Environmentally Significant Areas (ESA)
- Potential ESAs
- Upland Corridors
- Potential Naturalization Areas
- Unevaluated Vegetation Patches

Base Map Features

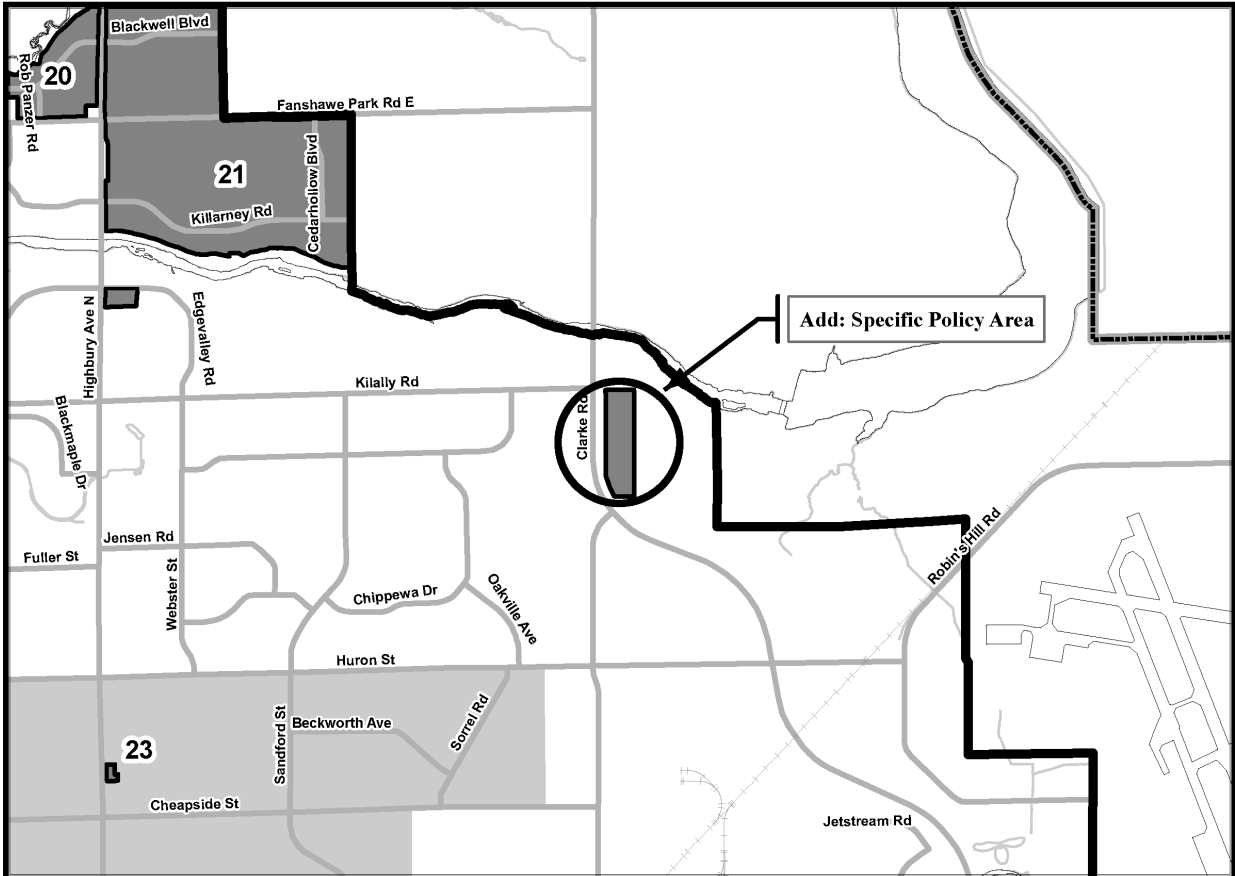
- Railways
- Water Courses/Ponds
- Streets (see Map 3)
- Conservation Authority Boundary
- Subwatershed Boundary
- Subject to Site Specific Appeals (LPAT Appeal PL170100)

This is an excerpt from the Planning Division's working consolidation of Map 5 - Natural Heritage of the London Plan, with added notations.





<p>SCHEDULE 3 TO</p> <p>OFFICIAL AMENDMENT NO. _____</p> <p><small>PREPARED BY: Planning & Development</small></p>	<p>Scale 1:30,000</p> <p>Meters</p>	<p>FILE NUMBER: OZ-9244/39T-20502</p> <p>PLANNER: LM</p> <p>TECHNICIAN: RC</p> <p>DATE: 2/26/2024</p>
--	-------------------------------------	---

“Schedule 5”





AMENDMENT NO:



LEGEND

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

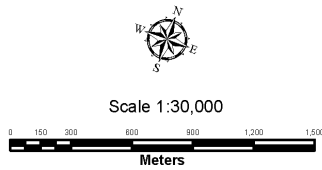
BASE MAP FEATURES

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

This is an excerpt from the Planning Division's working consolidation of Map 7 - Special Policy Areas of the London Plan, with added notations.

**SCHEDULE 4
TO
OFFICIAL AMENDMENT NO. _____**

PREPARED BY: Planning & Development



FILE NUMBER: OZ-9244/39T-20502

PLANNER: LM

TECHNICIAN: RC

DATE: 3/14/2024

Appendix B

Bill No. (number to be inserted by
Clerk's Office)
2024

By-law No. Z.-1-24_____

A by-law to amend By-law No. Z.-1 to
rezone an area of land located at 2331
Kilally Road and 1588 Clarke Road.

WHEREAS Sifton Properties Limited has applied to rezone an area of land located at 2331 Kilally Road and 1588 Clarke Road, as shown on the map attached to this by-law, as set out below;

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

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

- 1) Schedule "A" to By-law No. Z.-1 is amended by changing the zoning applicable to lands located at 2331 Kilally Road and 1588 Clarke Road, as shown on the attached map comprising part of Key Map No. A104, from an Urban Reserve UR4 Zone, an Urban Reserve/Temporary (UR4•T-56) Zone and a Holding Urban Reserve (h-2•UR4) Zone to a Holding Residential R1 (h-17•h-100•R1-4) Zone; a Holding Residential R1 Special Provision (h-17•h-100•R1-4(21)) Zone; a Holding Residential R1/Residential R3 Special Provision (h-17•h-100•R1-3/R3-1(**)) Zone; a Holding Residential R1/Residential R3 Special Provision/Residential R4 Special Provision (h-17•h-100•R1-1/R3-1(**)/R4-6(_)) Zone; a Holding Residential R1/Residential R3 Special Provision/Residential R4 Special Provision (h-17•h-100•R1-2/R3-1(**)/R4-6(_)) Zone; a Holding Residential R3/Residential R4 Special Provision/Residential R5/Residential R6/Residential R7/Residential R8 (h-17•h-100•R3-3/R4-6(_)/R5-7/R6-5/R7•H20•D100/R8-4•H20•D100) Zone; an Open Space OS1 Zone; and an Open Space OS4/OS5 Zone.
- 2) Section Number 4.21 Street Classifications – Specific Roads is amended by deleting the street classification of Kilally Road, from Clarke Road to 200 metres east of Clarke Road, as a 'Proposed Arterial'.
- 3) Section Number 7.4 of the Residential R3 Zone is amended by adding the following Special Provision:

R3-1(*)
 - a) Prohibited Use
 - i) Fourplex dwellings
- 4) Section Number 7.4 of the Residential R3 Zone is amended by adding the following Special Provision:

R3-1(**)
 - a) Prohibited Uses
 - i) Triplex dwellings
 - ii) Fourplex dwellings
- 5) Section Number 8.4 of the Residential R4 Zone is amended by adding the following Special Provision:

R4-6()

a) Regulations

- | | |
|-------------------------------|---------------------|
| i) Lot Frontage
(Minimum) | 6.7 metres per unit |
| ii) Lot Coverage
(Maximum) | 50 percent |

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

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

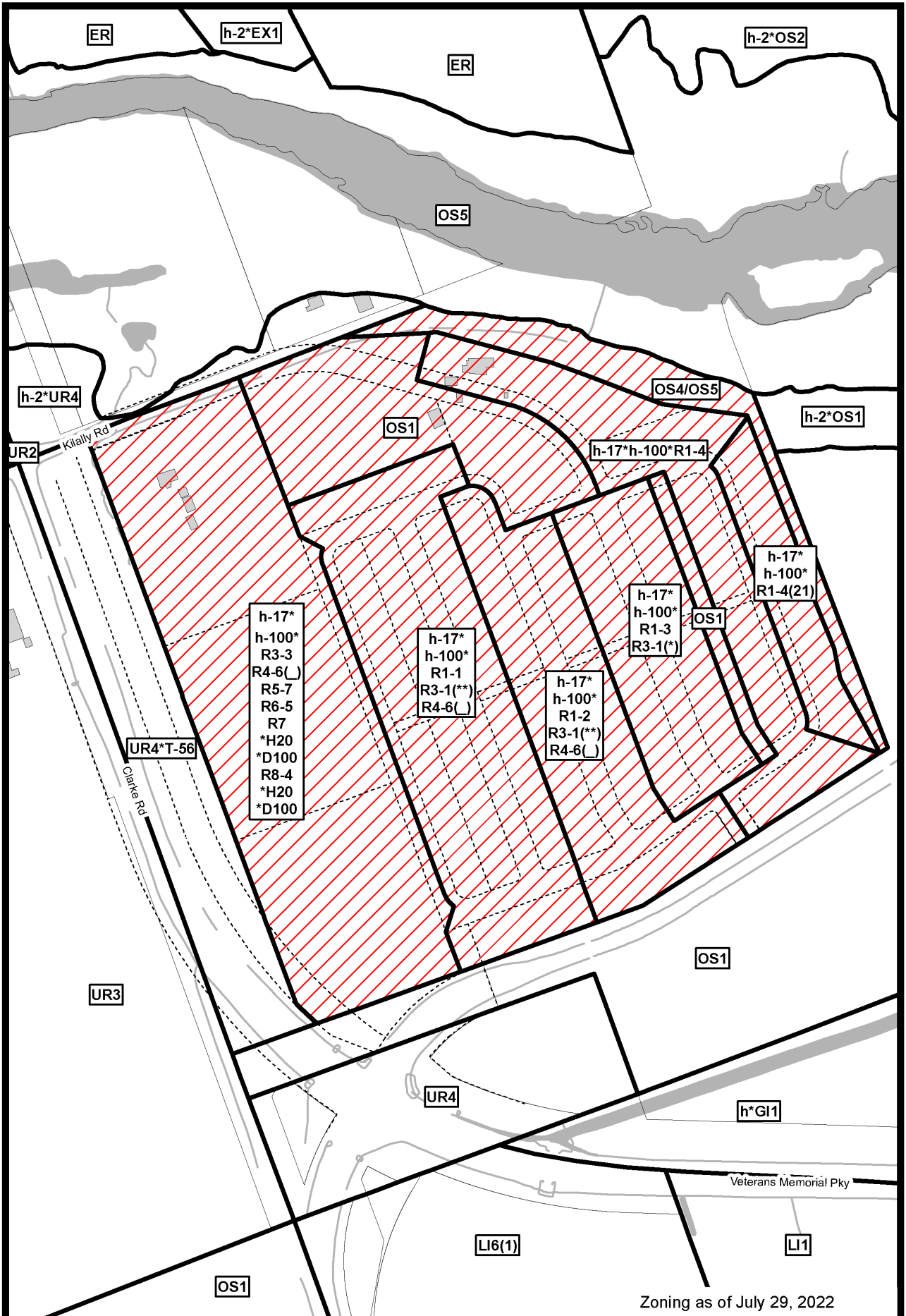
PASSED in Open Council on May 14, 2024, subject to the provisions of PART VI.1 of the *Municipal Act, 2001*.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – May 14, 2024
Second Reading – May 14, 2024
Third Reading – May 14, 2024

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



Zoning as of July 29, 2022

File Number: OZ-9244/39T-20502

Planner: LM

Date Prepared: 2024/03/25

Technician: RC

By-Law No: Z.-1-

SUBJECT SITE 

1:4,000

0 20 40 80 120 160 Meters



Appendix C – Public Engagement

Community Engagement

Public liaison: On September 6, 2023, a Notice of Revisions to Application for Draft Plan of Subdivision, Official Plan and Zoning By-law Amendments was sent to 14 property owners in the surrounding area. A Notice was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on September 14, 2023. A “Planning Application” sign was also posted on the site. Previous Notice of Application and Notices of Revised Application were circulated to the public on August 18, 2020, July 6, 2021, June 13, 2022 and September 6, 2023.

Responses: Two (2) telephone inquiries and seven (7) written responses were received (see below). In addition, there were five (5) email requests for further information.

Nature of Liaison: To consider a proposed draft plan of subdivision, Official Plan and zoning amendment to allow a residential subdivision consisting of low density single detached and semi-detached dwellings, medium density cluster dwellings, street townhouse dwellings, low-rise apartment buildings, parkland, multi-use pathways and a stormwater management facility, served by six (6) public streets. **Draft Plan of Subdivision** – Consideration of a proposed revised draft plan of subdivision consisting of eleven (11) low density residential blocks; nine (9) low-medium density residential street townhouse blocks; three (3) medium density residential blocks; two (2) park blocks; one (1) block for Stormwater Management (SWM) Pond; three (3) road widening and reserve blocks; served by a neighbourhood connector and several neighbourhood streets (Streets A, B, C, D, E & F). **Official Plan Amendment** – Consideration of possible amendments to The London Plan: Map 1 – Place Types to redesignate certain lands from “Neighbourhoods” to “Green Space”; Map 4 – Active Mobility Network to incorporate the proposed alignment for the Thames Valley Parkway; Map 5 – Natural Heritage to revise the limits of the ESA to reflect the findings of the Environmental Impact Study (EIS) completed in support of the proposed Draft Plan of Subdivision application; and Map 6 – Hazards and Natural Resources to redesignate the Maximum Hazard Line. **Zoning By-law Amendment** - Consideration of an amendment to the zoning by-law to change the zoning from an Urban Reserve UR4 Zone, an Urban Reserve UR4/Temporary (T-56) Zone and a Holding Urban Reserve (h-2•UR4) Zone to Residential R1 (R1-1) Zone to permit single detached dwellings on lots with a minimum lot area of 250 square metres and minimum lot frontage of 9.0 metres; Residential R1 Special Provision (R1-1(*)) Zone to permit single detached dwellings on lots with a minimum lot area of 250 square metres and minimum lot frontage of 9.0 metres, together with a special provision for a dwelling setback from a high pressure pipeline of 20 metres (minimum); Residential R1/Residential R3/Residential R4 Special Provision (R1-1/R3-1/R4-6(*)) Zone to permit a range of dwelling types such as single detached dwellings on lots with a minimum lot area of 250 square metres and minimum lot frontage of 9.0 metres; semi-detached dwellings with a minimum lot area of 430 square metres, minimum lot frontage of 18 metres, maximum lot coverage of 45%, and maximum height of 10.5 metres; and street townhouses with a minimum lot area of 145 square metres per unit and a minimum lot frontage of 5.5 metres per unit, together with a special provision for a lot coverage of 50 percent (maximum); Residential R5/Residential R6/Residential R7/Residential R8 (R5-7/R6-5/R7•H20•D75/R8-4•H20•D100) Zone to permit such uses as townhouses and stacked townhouses up to a maximum density of 60 units per hectare and maximum height of 12 metres; various forms of cluster housing including single detached, semi-detached, duplex, triplex, fourplex, townhouse, stacked townhouse, and apartment buildings up to a maximum density of 35 units per hectare and maximum height of 12 metres; senior citizen apartment buildings, handicapped persons apartment buildings, nursing homes, retirement lodges, continuum-of-care facilities, and emergency care establishments up to a maximum density of 75 units per hectare and maximum height of 20 metres; apartment buildings, stacked townhouses, and lodging house class 2 up to a maximum density of 100 units per hectare and maximum height of 20 metres; an Open Space OS1 Zone to permit such uses as conservation lands, conservation works, golf courses,

public and private parks, recreational buildings associated with conservation lands and public parks, campgrounds, and managed forests; and, an Open Space OS1(3) Special Provision Zone to permit conservation lands, conservation works, golf courses, public and private parks, recreational buildings associated with conservation lands and public parks, campgrounds, and managed forests, together with a special provision for no minimum lot frontage or minimum lot area requirement. An amendment to Subsection 4.21 of the Zoning By-law General Provisions is also requested to amend the street classification of Kilally Road, 200 metres east of Clarke Road, from a 'Proposed Arterial' to 'Local Road', and amend the road allowance limit as measured from the centre line from 18 metres to 10 metres to reflect existing conditions (the steep slopes and vegetation on the north side of Kilally Road will impede any road-widening plans), and to be consistent with the transportation network vision established in The London Plan.

Response to Notice of Application, Notices of Revised Application and Publication in "The Londoner"

Good Evening Larry,

In response to the most recent written notice of planning application for 2331 Kilally Road and 1588 Clarke Road, we are providing our comments in point form below. Please bring them forward for consideration.

- We wish to emphasize that we remain completely opposed to the location of the subdivision access from Kilally Road. The access to hundreds of houses via Street A is directly across from our home and this will be detrimental for us. The traffic, noise and light pollution, and impact to our privacy are increasingly concerning. The negative impact to the natural heritage of Kilally Road is significant with the potential pollution, noise, roadkill, impact to northern slopes and runoff. Access to the subdivision from Kilally Road as far west as possible is preferable to decrease the impact to us and the natural environment as it is today.
- We are concerned with the road junction in front of our home and regular, safe access to our driveway via the existing road. If a motor vehicle collision were to occur on the bend, it could potentially result in damage to our property, vehicles, and/or home, given the slope of our property.
- For consideration when planning road construction, we will continue to require driveway access to our property to the west: Concession 4, Lot 4, Part 8.
- We are requesting that all trees in good health bordering the south side of Kilally Road be left in place so long as they do not impact subdivision access. (At a minimum, the coniferous trees across from our barn and home)
- We are concerned with the significant financial implications that this development will create for us: to maintain privacy, to preserve the safety of our children and pets, and to deter trespassers (fencing, plantings, additional signage), and the potential impact to the integrity of our well and safety of our drinking water.

We will attend a public participation meeting when scheduled. We wish to be notified of the Approval Authority's decision in respect of the proposed draft plan of the subdivision. We also wish to be notified of the decision of the City of London on the proposed official plan amendment and zoning by-law amendment. As such, we have copied the Director of Planning and Development and the City Clerk on this email.

Thank you for taking the time to consider our concerns. You are welcome to visit our property and meet with us any time.

Kind regards,
Chris and Katie de Hart
2304 Kilally Road

Larry Mottram, Senior Planner
Subdivisions & Condominiums
Planning and Development
6th Floor, 300 Dufferin Ave
London, ON, N6A 4L9

DELIVERED VIA ELECTRONIC MAIL TO: LMottram@london.ca
RE: 2331 Kilally Road and 1588 Clarke Road (Sifton Properties Limited)
Proposed Draft Plan of Subdivision, Official Plan Amendment and Zoning By-Law Amendment
File # 39T-20502 / OZ-9244

Dear Mr. Mottram,

Lafarge Canada Inc. ("Lafarge") owns the property immediately north of the subject lands proposed for a Draft Plan of Subdivision, Official Plan Amendment, and Zoning By-Law Amendment located at the intersection of Clarke Road and Fanshawe Park Road East. These lands (74.8 ha) are zoned as Extractive Industrial (EX1) in the City of London and licensed under the Aggregate Resources Act (ARA). The site is referred to as Lafarge's Carpenter-Dobinson Pit (Lic. # 2120), and includes an asphalt plant that is operated by Dufferin Construction.

The application package issued for File # 39T-20502 / OZ-9244 states that the proponent plans to construct a mixture of low-density and medium-density homes with open space features. The Lafarge Carpenter-Dobinson Pit is within the vicinity of the proposed development and is an active operation. As such, Lafarge is of the opinion that the City of London must ensure our uses are protected from incompatible development through appropriate mitigation and other conflicts that are to be avoided as required by Local and Provincial land use planning policy.

The Provincial Policy Statement (PPS) protects aggregate operations from development that would preclude or hinder their expansion and continued use (PPS 2.5.2.4). Lafarge has reviewed the supporting technical studies of this application, and offers the following preliminary comments:

- As part of the supporting technical studies, the proponent completed a Noise Feasibility Study (HGC Engineering, 2020). Staff from the City of London specifically requested this report due to the proximity of the subject lands to existing aggregate operations. However, HGC focused on an assessment of the impacts of road traffic on the proposed development, and included a review of noise from the nearby commercial and industrial uses as per the MECP D-6 Guidelines. While the report evaluates the potential impact of the asphalt plant on new sensitive uses, there was no evaluation of Lafarge's existing aggregate operations. Lafarge asks that the City of London ensure Lafarge's aggregate operations are also considered and protected from incompatible development that could otherwise hinder or preclude its expansion and continued use.
- In addition to the above, we note that in Blocks 166, 167, 168, 169, 170 and 171, the plan includes medium-density homes. We note these are 13 metres in height and were not addressed in HGC's report. Therefore, we request that site specific noise and visual impact studies be completed for the medium-density homes which are proposed on Kilally Road and Clarke Rd as the height and orientation of these buildings may lead to impacts on the existing aggregate and asphalt plant operations.
- We are pleased to see that HGC recommended that warning clauses be included in the property and tenancy agreements and offers of purchase and sale for all dwellings to inform future occupants of noise and other impacts from the aggregate operations, asphalt plant and ancillary uses. Lafarge requests to be involved in the drafting and review of warning clauses for the proposed development to confirm that these clauses inform future occupants of the nearby aggregate operation and asphalt plant. Lafarge would also appreciate reviewing

any other provisions in the development and/or subdivision agreement(s) that address land use compatibility.

Overall, Lafarge appreciates that the City of London has tried to ensure compatibility of the subject lands in proximity to a legally zoned and licenced aggregate operation. Once the application has been resubmitted we ask that staff from the City of London undertake appropriate peer reviews of the relevant supporting technical studies to confirm consistency with planning policies and ensure new sensitive uses do not preclude or hinder the operation of the asphalt plant and Carpenter-Dobinson Pit.

Thank you for the opportunity to provide comments on this application. We ask that Lafarge is kept informed of any further developments on this file and that we are notified in advance of any meetings before Planning Committee and/or Council. Please do not hesitate to contact me should you require clarification on any of the above.

Respectfully,
LAFARGE CANADA INC.

David Bazargan, MES
Land Manager, Southwest Ontario

City of London - Development Services
P.O. Box 5035
London, Ontario N6A 4L9

Attention: Larry Mottram (sent via e-mail)

Dear Mr. Mottram:

Re: UTRCA LANDOWNER Comments
File No.: 39T-20502 and OZ-9244
Notice of Application for Draft Plan of Subdivision and Zoning By-law
Amendment
Applicant: Sifton Properties Limited
2331 Kilally Road and 1588 Clarke Road, London

The Upper Thames River Conservation Authority (UTRCA) has received the aforementioned application and proposed revisions to the Draft Plan of Subdivision, dated September 6, 2023.

In response to the initial Notice of Application circulated on June 13, 2022, UTRCA provided landowner comments dated December 13, 2022 that outlined a number of significant adjacent landowner concerns and challenges with the development proposal. UTRCA staff encouraged the opportunity to meet with City staff and the developer to undertake efforts to address these challenges.

With reference to the revised draft plan that was circulated on September 6, 2023, UTRCA landowner comments and concerns remain outstanding and have not been discussed or addressed. Most notably, the City of London transportation requirements have yet to be clarified or confirmed, and the revisions to the Draft Plan of Subdivision has resulted in the proposed addition of a roundabout on UTRCA-owned lands in the most recent circulation.

UTRCA requests a written response to landowner comments provided to the City/Developer on December 13, 2022. As noted above, this information will assist UTRCA staff in evaluating the impacts of the proposed development to management of UTRCA lands and Fanshawe Conservation Area operations.

Thank you for the opportunity to comment.

Yours truly,
UPPER THAMES RIVER CONSERVATION AUTHORITY

Brent Verscheure
Manager of Lands, Facilities and Conservation Areas

City of London - Development Services
P.O. Box 5035
London, Ontario N6A 4L9
Attention: Larry Mottram (sent via e-mail)

Dear Mr. Mottram:

Re: UTRCA LANDOWNER Comments
File No.: 39T-20502 and OZ-9244
Applications for Draft Plan of Subdivision, Official Plan and Zoning By-Law Amendment
Applicant: Sifton Properties Limited
Agent: MBPC
2331 Kilally Road and 1588 Clarke Road, London

The Upper Thames River Conservation Authority (UTRCA) has reviewed the aforementioned applications to consider our interests as an adjacent landowner. The UTRCA owns the lands at 1424 Clarke Road, home to the Fanshawe Conservation Area (FCA) and Watershed Conservation Centre (WCC). Our staff, clients and patrons have accessed our grounds and facilities from our private entrance road at the intersection of Clarke Road and Veterans Memorial Parkway (the "entrance") for over 70 years. The current proposal will have both direct and indirect impacts to our existing entrance and our business operations. The Authority has been involved in the review of this application since its onset and previously provided comments on this application in correspondence dated December 14, 2020 and September 15, 2021, the latter being specific to the access from our existing entrance.

In addition to the Authority's concerns from a landowner perspective, additional comments have been submitted under separate cover to address our role as a technical review agency.

The UTRCA is of the opinion that Sifton's proposed development has progressed significantly through the planning process without having proper regard for the current land ownership and future land acquisition needs to support a subdivision with greater than 80 units. It is still unclear to Authority staff whether the City of London will require Sifton to acquire and service a secondary entrance off Authority owned private lands at our Conservation Area entrance. Further, applicants are required to engage in meaningful discussion with adjacent landowners, in this case the UTRCA, prior to requesting and/or accepting draft conditions.

Conservation Authority staff have met with City Planning staff on numerous occasions to express our landowner interests and the significant challenges this proposed development will have on our business operations. UTRCA staff has continually been reassured that all of our concerns will be resolved once the development has been draft approved. It is our position and opinion that the land acquisition matters required to accommodate the proposed development should be resolved prior to the draft plan being approved and in effect. Ultimately, the application which is being advanced for approval requires additional information and confirmation prior to proceeding. The details of our concerns are outlined below:

1. Permanent Subdivision Access

As per City standards, new subdivisions are required to have two (2) vehicular access points where the proposal contains greater than 80 residential units. As this proposal is in excess of that amount, a secondary access is required. The City's transportation

division has identified the private laneway to Fanshawe Conservation Area as a suitable alternative given the long-term plans for Veterans Memorial Parkway. This was identified early on in the planning process yet Sifton has not consulted the Authority or initiated any form of discussion to acquire our laneway for the subdivision design.

The Authority owns approximately 470 metres of laneway from the Clarke Road/Veterans intersection (City owned right-of-way) to the Fanshawe Conservation Area gatehouse. This laneway is critical to the Conservation Area business operations and allows for the stacking of vehicles entering the park for camping, events, recreation, and employment.

The proposed secondary access to the subdivision, Block 31, will result in a significant reduction to the Authority's laneway and therefore negative impacts on our daily operations. In order to ensure these impacts are negated, relocation of the gatehouse needs to be evaluated. Sifton shall be required to demonstrate how they are able to mitigate these impacts, likely through the relocation of the Fanshawe Conservation Area gatehouse closer to the Fanshawe Dam.

A preliminary list of impacts that could arise as a result of gatehouse relocation are as follows:

- i. Insufficient stacking and proper queueing for patrons visiting the Conservation Area;
- ii. Costs associated with the relocation of all servicing, including but not limited to roads/paving, hydro, water, gas, telecommunication, lighting, sanitary/septic, etc.
- iii. Increased traffic and flow due to residents utilizing roadway and services offered at the Conservation Area;
- iv. The Memorial Forest and tree-lined laneway may be impacted should the gatehouse relocation result in a revised laneway location; and,
- v. The historic entrance pillars may need to be re-aligned.

To determine if this is a feasible alternative, Sifton/UTRCA shall retain qualified third party consultants to study the various options, completed to the satisfaction of the UTRCA at no cost to the UTRCA. A list of studies may include:

- Servicing Needs Assessment – existing inventory and future needs assessment
- Architectural, Engineering and Landscape Design Plans
- Geotechnical Report (construction based, not related to a slope)
- Cultural Heritage Assessment
- Archaeological Assessment
- Ecological Opinion Letter
- Other studies as deemed necessary to accommodate any future design, planning or engineering associated to the relocation and/or entrance realignment

Please revise Draft Condition 115 to identify that multiple studies are required and shall be completed with no financial burden to the City or the Conservation Authority.

Based on the comments provided by MBPC on September 9, 2022, it is clear that Sifton is unaware of the undue consequences that will be placed on the Authority's operations should an access location be required along our private laneway. We are of the opinion that a Draft Condition is a minimum requirement for this application to progress to ensure protection of the viability and success of our business. Should an alternative arrangement for made for a secondary access at a different location, this condition will be easily cleared.

2. Temporary Subdivision Access for Construction

A temporary construction access is proposed at the south-west extent of the subdivision, future Street 'G', fronting on the municipal right-of-way at Clarke Road. While this access is on City-owned lands, there are concerns regarding the impacts construction will have the daily functions of the Conservation Authority's business. The

UTRCA is supportive of Condition 77 to relocate the construction access to Kilally Road, contrary to the MBPC position in their letter dated September 9, 2022.

Furthermore, this temporary access will be utilized during the subdivision build-out, as a right-in-right-out, until the Veterans Memorial Parkway flyover is completed. The anticipated timeline for the flyover construction is a project far into the future. A third party traffic consultant shall undertake additional study on this access based on the projected traffic volumes until the City's anticipated construction of the flyover, to determine the significance of the impacts on the Conservation Authority entrance and operations.

3. Municipal Street

Following the installation of a new intersection at Clarke Road and Veterans Memorial Parkway, a new municipal right-of-way extended along the former Fanshawe Conservation Area private laneway. At this time, this right-of-way is considered to be Clarke Road. It is our understanding that a new road name may be required should this right-of-way be turned into a municipal street/public road as a result of the potential subdivision access that is required.

This change may result in a new address for the long-standing Upper Thames River Conservation Authority, Watershed Conservation Centre and Fanshawe Conservation Area. This change is substantial to the Authority and will result in many administrative changes that will cause further business interruption and cost. Please provide information in this regard at your earliest convenience.

4. Encroachment, Connection and Fencing

The subdivision proposal includes a paved pathway connection and other areas that could be utilized by foot traffic. Fencing shall be placed along all property boundaries adjacent to UTRCA owned lands to reduce encroachment into naturalized areas and private lands. Fencing shall be installed to the satisfaction of the Authority and at no cost to the Authority. Please revise Condition 128 accordingly.

5. Land Conveyance

The proposed Draft Plan identifies a small buffer strip along the rear yards at the eastern extent of the subdivision, identified as Block 32. A portion of this area is directly adjacent to UTRCA owned lands and is proposed to be conveyed to the Authority.

- a) Please provide additional details on this proposed transfer of lands.
- b) Details on the long-term maintenance of this area have not been discussed and shall not place any unnecessary burdens onto the Conservation Authority to deal with trespassing, encroachment or maintenance.
- c) Authority has not agreed to accept this proposed transfer and will consider this transfer based on the information provided above.

6. Draft Conditions

Comments on the draft conditions are based on those provided to the Authority dated August 18, 2022.

- a) Condition 35:

The Owner shall acquire land from the Upper Thames River Conservation Authority (UTRCA) from the Street 'A' connection over Block 31 in this plan to the UTRCA lands for a second public access to Clarke Road to be dedicated and built out as a fully serviced public street as part of this plan of subdivision.

Contrary to the comments provided by MBPC on September 9, 2022, the UTRCA agrees that this condition is necessary to ensure land that is required to accommodate the proposed development is acquired from the Conservation Authority through appropriate mechanisms. This condition should not be removed until confirmation of the access requirements are finalized.

- b) Condition 50:

Prior to issuance of any Certificate of Conditional Approval, the Owner shall undertake external works on Kilally Road, Clarke Road and the current Fanshawe Conservation Area access to the satisfaction of the Deputy City Manager, Environment and Infrastructure, at no cost to the City.

Please revise this wording to include the UTRCA, as any works on the Fanshawe Conservation Area access roadway that come as a result of this proposed subdivision shall not result in financial burden to the Authority.

c) Condition 115:

Prior to final approval of any portion of the subdivision plan above 80 residential units, the Owner shall retain a qualified consultant to complete a study of the entrance configuration to Fanshawe Conservation Area, including options for relocating the gatehouse, traffic congestion issues and patterns, and road design, in consultation with and to the satisfaction of the City and the UTRCA.

As per the comments above in Comment 1, we recommend modifying the wording of this condition to identify that multiple studies will be required to undertake this *third party* assessment, and no financial burden shall be placed on the UTRCA to undertake the studies. Further, these studies shall be required immediately and prior to the subdivision plan approval for the initial 80 units. The Authority and business operations need sufficient time to plan, design, and communicate any changes to the appropriate stakeholders.

d) Condition XX (New/Proposed):

As part of the Focused Design Studies submissions, a third party shall provide a revised Traffic Impact Assessment, which addresses the Conservation Authority's outstanding comments and concerns (as noted in their correspondence dated November XX, 2022), to the satisfaction of the UTRCA. Further red-line revisions to the draft plan may be required to address those concerns/comments.

e) Condition XX (New/Proposed):

The Owner shall undertake further consultation with the Upper Thames River Conservation Authority to address their concerns as a landowner. A written summary of this consultation and any resulting agreements shall be documented and prepared to the satisfaction of the UTRCA at no cost.

Please circulate a revised version of the proposed draft conditions of approval for our review before the staff report is finalized.

As noted above, the UTRCA has clearly identified and consistently communicated our major concerns as an adjacent landowner since the onset of this application. The Authority is of the opinion that the approval process for this proposed development by Sifton has not fully considered our interests as a neighbouring and adjacent landowner. While the UTRCA is not supportive of approving the proposed draft plan in its' current state, we offer the aforementioned conditions to ensure our concerns are addressed prior to the development progressing any further.

Based on the Draft Conditions dated August 18, 2022, it is apparent that the City and the UTRCA agree that the applicant is responsible for addressing the Conservation Authority's concerns, interests and requirements with respect to our business operation and the impacts being caused or realized from the proposed development. Despite commenting on and providing Draft Conditions, our position shall not be construed that we are supportive of or in agreement with the proposed development.

UTRCA staff would appreciate the opportunity to meet with the City and the applicant to engage in further

Thank you for the opportunity to comment.

Yours truly,

UPPER THAMES RIVER CONSERVATION AUTHORITY

Brent Verscheure

Good afternoon Larry.

I am writing you about Official Plan / Zoning Applications: OZ-9244 - 2331 Kilally Road and 1588 Clarke Road for residential housing.

I live in North East London (Cedar Hollow neighbourhood to be exact) and I wanted to draw your attention to an issue with putting residential housing at 2331 Kilally Road and 1588 Clarke Road. COCO Paving and Dufferin Construction both operate aggregate operations and more concerning pavement/asphalt production facilities about 500 meters to the north and north west of the proposed properties. This is an issue because production of pavement/asphalt produces fumes which will likely cause conflicts with the residential area proposed. I ride my bike and hike at Fanshawe Conservation area and regularly smell the pavement/asphalt fumes due to the prominent winds from the North West direction. When the wind blows from the east, I can smell the pavement/asphalt fumes at my house which is over 1.5km away and even with that distance, it bothers me. I can't imagine living only 500 meters from these facilities.

I think if the city is to expand residential housing any closer to these two facilities, that they wait until the facilities have stopped pavement/asphalt production permanently so there are not any conflicts with the health and wellbeing of the residents.

Best regards,
Chris Johnston

Subject: [EXTERNAL] re: Clarke Rd and Killally Subdivision Development

Hello, seen the sign posted today, please don't let this happen and ruin the beautiful entrance to Fanshawe Park, not to mention the effects on the park itself. I see deer and other wildlife cross the entrance road to Fanshawe daily. The construction that is currently ongoing is disturbing enough (although is very necessary).

Dan Silverthorn

Subject: RE: [EXTERNAL] 1588 Clarke Rd. Development

Good afternoon,

I just wanted to remind you of my request for 1588 Clarke rd. PCB soil test. I spoke with MLHU and they told me it would be unlikely the city would develop on that land and the Ministry of Environment said the land would be required to be tested for PCB's, being so close to Westinghouse. Therefore this information should be readily available, although Sifton seems unaware of this.

I am extremely disappointed not once was I told I was exposed to this for 21 years of my life. I would like this information for my appointment with my doctor and neurologist on December 24th. The soil being tested would give us a better understanding of why my family tested the highest in the city and explain the many health issues we have had, that correlate with the effects of PCB contamination.

Thank you,
Angela Tackabury

Significant Agency/Departmental Comments

Hydro One Networks Inc. – September 25, 2023

Please be advised that Hydro One Networks Inc. (“HONI”) has completed a preliminary review of the proposed plan of the above noted subdivision application. As the subject land is abutting and/or encroaching onto a HONI high voltage transmission corridor (the “transmission corridor”), HONI does not approve of the proposed subdivision **at this time**, pending review and approval of the required information.

Please be advised that the transmission corridor lands affected by the proposed development and identified as such herein are subject to a statutory right in favour of HONI pursuant to Section 114.5(1) of *The Electricity Act, 1998*, as amended. The owner of these lands is Her Majesty, The Queen In Right of Ontario, as represented by The Minister of Infrastructure (“MOI”). Ontario Infrastructure & Lands Corporation (“OILC”) as agent for the Province, must review and approve all secondary land uses such as roads that are proposed on these lands. HONI is currently acting as a service provider to OILC, and undertakes this review on their behalf.

The comments detailed herein do not constitute an endorsement of any element of the subdivision design or road layout, nor do they grant permission to access, use, proceed with works on, or in any way alter the transmission corridor lands, without the express written permission of HONI.

Should the developer require any use of and/or access to the transmission corridor at any time, the developer must contact **Breanna Rozon, Real Estate Coordinator** at **breanna.rozon@hydroone.com** in order to ensure all of HONI’s technical requirements are met to its satisfaction, and acquire any applicable agreements.

The following should be included as **Conditions of Draft Approval**:

1. Prior to HONI providing its final approval, the developer must make arrangements satisfactory to HONI for lot grading and drainage. Digital PDF copies of the lot grading and drainage plans (true scale), showing existing and proposed final grades, must be submitted to HONI for review and approval. The drawings must identify the transmission corridor, location of towers within the corridor and any proposed uses within the transmission corridor. Drainage must be controlled and directed away from the transmission corridor.
2. Any development in conjunction with the subdivision must not block vehicular access to any HONI facilities located on the transmission corridor. During construction, there must be no storage of materials or mounding of earth, snow or other debris on the transmission corridor.
3. At the developer’s expense, temporary fencing must be placed along the transmission corridor prior to construction, and permanent fencing must be erected along the common property line after construction is completed.
4. The costs of any relocations or revisions to HONI facilities which are necessary to accommodate this subdivision will be borne by the developer. The developer will be responsible for restoration of any damage to the transmission corridor or HONI facilities thereon resulting from construction of the subdivision.
5. This letter and the conditions contained therein should in no way be construed as permission for or an endorsement of proposed location(s) for any road crossing(s) contemplated for the proposed development. This permission may be specifically granted by OILC under separate agreement(s). Proposals for any secondary land use including road crossings on the transmission corridor are processed through the Provincial Secondary Land Use Program (PSLUP). HONI, as OILC’s service provider,

will review detailed engineering plans for such proposals separately, in order to obtain final approval. Should approval for a road crossing be granted, the developer shall then make arrangements satisfactory to OILC and HONI for the dedication and transfer of the proposed road allowance directly to the City of London

Access to, and road construction on the transmission corridor is not to occur until the legal transfer(s) of lands or interests are completed.

In addition, HONI requires the following be conveyed to the developer as a precaution:

6. The transmission lines abutting the subject lands operate at either 500,000, 230,000 or 115,000 volts. Section 188 of Regulation 213/91 pursuant to the *Occupational Health and Safety Act*, require that no object be brought closer than 6 metres (20 feet) to an energized 500 kV conductor. The distance for 230 kV conductors is 4.5 metres (15 feet), and for 115 kV conductors it is 3 metres (10 feet). It is the developer's responsibility to be aware, and to make all personnel on site aware, that all equipment and personnel must come no closer than the distance specified in the *Act*. They should also be aware that the conductors can raise and lower without warning, depending on the electrical demand placed on the line.

Our preliminary review only considers issues affecting HONI's transmission facilities and transmission corridor lands. For any proposals affecting distribution facilities (low voltage), the developer should consult the local distribution supplier.

Upper Thames River Conservation Authority – November 3, 2022

The Upper Thames River Conservation Authority (UTRCA) has reviewed these applications and the supporting technical submissions with regard for Section 28 of the *Conservation Authorities Act*, the Provincial Policy Statement (2020) and the Environmental Planning Policy Manual for the Upper Thames River Conservation Authority (June 2006). These comments and conditions of draft plan approval are provided in our role as a Technical Agency providing advice to the municipality on the applications. Please note that the UTRCA is also an adjacent landowner and will be providing our Landowner comments under separate cover.

UTRCA TECHNICAL AGENCY COMMENTS

Further to our correspondence dated December 14, 2020 and October 27, 2021 [enclosed], the UTRCA offers the following comments regarding the proposed development and the supporting technical information/submissions.

Hydrogeological Assessment

Kilally Development Hydrogeological Study prepared by AECOM, dated December, 2021

The City of London's Hydrogeologist has completed a cursory review of the submitted report on behalf of both the municipality and the Conservation Authority. We understand that there are substantial grading concerns associated with the proposed development but that those matters will not impact the development limits of the subdivision.

At the present, it seems that the proposed stormwater management pond and most of the subdivision are proposed within the uppermost portion of the groundwater table. The landowner has been advised of the City's concerns and that those conditions cannot be supported given that the baseflow to the downstream receivers could be cut off. City staff have advised that the applicant will be required to raise the grade on most of the site which will likely impact other aspects of the development such as the road connections, servicing elevations, etc. Given that there may be significant changes to the subdivision layout, a detailed review of the Final Hydrogeological Assessment will be completed as part of Focussed Design Studies. The UTRCA agrees with this approach and is in a position to offer a draft condition in regards to the preparation of a Final Hydrogeological Assessment and Water Balance Analysis.

Environmental Impact Study

Kilally Lands - Environmental Impact Study Addendum – Caverhill Plan of Subdivision dated March 17, 2021 prepared by AECOM

Response Table – ***Responses to UTRCA Comments on the Draft Plan of Subdivision File 9T-20502 – 2331 Kilally Road and 1588 Clarke Road*** prepared by AECOM (undated).

Based on the December 6, 2021 meeting with the ecological consultant, it was our understanding that a letter response was going to be submitted which would address the UTRCA's outstanding comments on the EIS. Those responses would then be incorporated into a Final EIS through the Focussed Design Studies process. All of the Conservation Authority's outstanding ecological comments must be addressed to our satisfaction in a Final EIS. The submission shall include a covering memo indicating how each of the comments has been addressed.

Stormwater Management Report

Sifton Properties Limited Kilally Subdivision Conceptual Stormwater Servicing Report prepared by AECOM dated June 20, 2020

The following comments were provided by the UTRCA on December 14, 2020 –

- 1. In Section 1.1, it is mentioned that proposed stormwater management (SWM) pond will provide quantity control and infiltration retention volume to meet on-site SWM and water balance targets. The UTRCA strongly recommends the infiltration of clean runoff only. Please consider.*
- 2. Please consider the groundwater interaction with the proposed SWM pond. The groundwater recharge shall not affect the operation of the pond.*
- 3. The conveyance of major overland flows through the ROWs within the subdivision should be supported by calculations and cross-sections showing depths under the 100-year and 250-year storm to ensure that the proposed ROW has enough capacity to convey major flows.*
- 4. Block 175 shows the proposed SWM facility. The proposed SWM pond shall be outside the development limit established by the greater of the natural hazard and heritage setback and the supported by the geotechnical report/analysis.*
- 5. The future SWM facility outlet shown on the conceptual storm servicing plan in Appendix B shall not cause erosion and any effect on the steep slope of the confined system. The proposed outlet including velocities under the minor and major system shall not cause any erosion that may affect the stability of the slope and energy dissipation to avoid erosion at the bottom of the slope.*
- 6. Page 66 of the **Final Proposal Report** by Monteith Brown Planning Consultants dated June 2020 shows approximately 4.8 ha area contributing runoff the existing woodland to the east on the UTRCA's property. The UTRCA recommends undertaking a water balance analysis and maintaining the base flow to the woodland on the east. Please address.*
- 7. The UTRCA strongly recommends that education materials be provided to the residents of the proposed subdivision related to living near natural areas such as river and parks to inform them about the importance of the natural feature and ecosystem.*

As part of the Focused Design Studies, we request that the foregoing comments be addressed in a Functional Stormwater Management Report and SWM Monitoring, Maintenance and Operation Manual prepared to the satisfaction of the UTRCA.

Geotechnical Investigation/Slope Stability Assessment

Geotechnical Investigation and Slope Stability Assessment Proposed Caverhill Subdivision

Development 2331 Kilally and 1588 Clarke Road London, Ontario [Revised: 2] prepared by Peto MacCallum dated July 21, 2022

Conservation Authority staff met with the consultants on May 17, 2021 to discuss the comments on the 2018 slope stability assessment as well as the submission

requirements noting that the study should be prepared consistent with the Ministry of Natural Resources **Technical Guide – River & Stream Systems: Erosion Hazard Limit** [2002]. A revised Geotechnical Investigation/Slope Stability Assessment was received electronically on Friday July 22, 2022.

1. In Section 4 it is noted that during the site reconnaissance in the fall of 2017 some localized slope failure near the top of the slope and localized erosion channels down the slope were observed. Please confirm that these slope conditions were considered in the Factor of Safety [FOS] analysis and that the proposed development will not affect the existing slope conditions including surface drainage and erosion.
2. In Section 4.1 it is mentioned that surficial fill and topsoil were encountered between 0.15 and 2.2 m depth in Boreholes 11, 13 and 15. Please confirm if the fill was considered in the FOS analysis for the stable slope.
3. In Section 4.5 it is mentioned that during drilling, seepage from the wet and saturated sand/sand and gravel/silt till deposits was observed below 20.4 and 25.2 m depth (Elevation 254.4 to 249.4) in Boreholes 11, 13 and 15. Also, saturated conditions were observed at 0.8 m depth (Elevation 249.37) in Borehole 12. Please confirm that the local groundwater fluctuations including recharging were considered in the FOS analysis for the stable slope.
4. In a table, please report the local soil properties such as the unit weight and strength etc. that was used in the FOS analysis.
5. The provided slope W cross-sections show several FOS for slope failure. For example, in the case of cross-section AA, the FOS ranges from 1.365 to 1.765 however, the report suggested a safe and stable FOS of 1.5. Please provide an explanation.

The UTRCA is generally satisfied with the Geotechnical Investigation/Slope Stability Assessment. The foregoing comments can be addressed in a Final Slope Stability Assessment as part of the Focused Design Studies process.

Multi-Use Paved Pathway

We understand that a multi-use, paved pathway is to be implemented as part of this proposed plan of subdivision. On a recent concept plan dated September 8, 2022, the applicant has identified the proposed pathway alignment located along Kilally Road and Street 'G'. It is our understanding that the City of London will be implementing the pathway and we are not certain if the pathway layout meets the City's requirements. Should the pathway be located within a regulated area, a Section 28 permit and additional technical studies may be required.

UTRCA AGENCY RECOMMENDATIONS/DRAFT CONDITIONS OF APPROVAL

The UTRCA is generally satisfied with the provided technical information and is of the opinion that the remaining concerns can be addressed in Final reports as part of the Focused Design Studies process. We have reviewed the *DRAFT* Conditions of Draft Plan Approval which were prepared and circulated by City Planning Staff. We offer the following modified conditions [numbering from the original document has been maintained].

UTRCA - Conditions 131- 135

131. As part of the Focused Design Studies submissions, the Owner shall provide a Final EIS Report which addresses the Conservation Authority's outstanding comments and concerns, to the satisfaction of the UTRCA. Further red-line revisions to the draft plan may be required to address those concerns/comments.

132. As part of the Focused Design Studies submissions, the Owner shall provide a Final Geotechnical Investigation and Slope Stability Assessment Report which is prepared consistent with the Ministry of Natural Resources Technical Guide – River & Stream Systems: Erosion Hazard Limit [2002], to the satisfaction of the UTRCA.

133. As part of the Focused Design Studies submissions, the Owner shall provide a Final Hydrogeological Assessment and Water Balance Analysis prepared in accordance with the Conservation Ontario Hydrogeological Assessment Guidelines [2013] to the satisfaction of the UTRCA.

134. As part of the Focused Design Studies submissions, a Final Functional Stormwater Management Report and SWM Monitoring, Maintenance and Operation Manual shall be

prepared and submitted to the satisfaction of the UTRCA.

135. In accordance with Ontario Regulation 157/06 made pursuant to Section 28 of the Conservation Authorities Act, the Owner shall obtain the necessary permits/approvals from the UTRCA prior to undertaking any site alteration or development within the UTRCA Regulated Area including filling, grading, construction, site alteration to watercourse and/or interference with a wetland.

The UTRCA requests both an electronic and a hard copy of all of the Final reports/studies.

Urban Design – October 23, 2023

Comments for Zoning:

- Ensure the proposed zoning for each block implements the policies of The London Plan. This may include, but is not limited to setbacks, orientation, garage maximum widths, minimum and maximum densities, etc.:
 - Include a minimum front and exterior side yard setback from proposed Neighbourhood Streets and Neighbourhood Connectors in order to encourage street-orientation while avoiding encroachment of footings and canopies. Best practice is a maximum setback of 6.0m and a minimum setback of 1.0m;
 - Garage widths for residential units (low and medium density blocks) shall not exceed 50% of the overall façade width and shall not protrude beyond the front face of the building;
 - The front façade and primary entrance of all dwelling units shall be oriented to adjacent public streets and/or open spaces with direct pedestrian connections to the public sidewalk or walkway;
 - The layout of all medium density sites should ensure surface parking areas are located away from public street frontages;
 - Ensure pedestrian circulation through the medium density blocks connects all buildings and unit entrances to the public sidewalk and/or walkway, and provide connections between blocks/sites.

Appendix D – Applicant Responses to EEPAC Comments

Responses to EEPAC Comments on the Draft Plan of Subdivision File 9T-20502 - 2331 Kilally Rd and 1588 Clarke Rd.

RESPONSE FROM AECOM	
<p>GENERAL COMMENTS FROM EEPAC</p> <p>The lack of reference to the work done for the Kilally Basin EIS and the Clarke Road Bridge EA is a glaring fault with the report. Although it is clear the field work was done prior to those two reports, the Clarke Road Bridge EA was placed on the public record well before the publication date of this EIS, and the Kilally Basin EIS was well advanced [EEPAC received an update from the consultants last year]. To ignore both the Clarke Road Bridge EA and the Kilally Basin EIS in the long term impacts section means the comments about long term direct impacts in this EIS understate impacts because impacts are cumulative and not isolated from one another. For example, the emergency overland flow from the SWM facility on this site is not shown in this EIS, even though it appears in the City lead EA for the SWM system.</p> <p>It is extremely unfortunate the Clarke Rd Bridge replacement and Kilally development projects aren't being considered jointly given that the SWM construction will precede the development. This piecemeal approach is undesirable at best, actively detrimental at worst. The City must consider the "big picture" in terms of these coincident development projects. There should be crosstalk between these projects to ensure the resulting development projects do not have unintended consequences.</p>	<p>The Environmental Impact Study (EIS) prepared by North-South Environmental as part of the Kilally South East Basin Municipal Class EA was not complete until September 2020. The AECOM Kilally Lands Plan of Subdivision Environmental Impact Study was completed in March 2020, therefore the information from the Kilally South East Basin (EIS) could not have been incorporated into our report. Notwithstanding this, we will incorporate information from the Kilally South East Basin (EIS) and the Clarke Rd Bridge EA into an updated EIS for the Kilally Lands Plan of Subdivision.</p> <p>See above</p>
RESPONSE FROM AECOM	
<p>EEPAC RECOMMENDATIONS</p> <p>BUFFERS</p> <p>EEPAC emphatically disagrees with Recommendation 2 (buffers) on page 45 and summarized on page 49.</p> <p>pg 49 "Recommendation 2 – the recommended buffer zones outlined above and delineated on Figure 8 should be implemented as protection measures and established as "no development" areas. Buffers may include multi-use trails."</p> <p>How are multi-use (i.e. paved) trails - that require tree removal (in a significant woodland no less) considered "no development"?</p> <p>The proposed buffer is insufficient given the sensitivity of the floodplain. Section 9.2.1 is the consultant's buffer justification however, EEPAC believes this is the first time it has seen this "backwards" rationale for a buffer:</p> <p>p. 45 - "The determination of buffer area dimensions is most dependent upon which activities will be permissible within the buffer. The nature of the development also affects how extensive the buffer zone should be, based on noise, dust, and lighting levels produced, and the degree of alteration of the existing habitat."</p> <p>There is no citation for this statement (We assume this is Castelle 1993 who is mentioned on page 44).</p> <p>Given the high sensitivity of the Thames River Valley as shown in the EAs for the SWM works and for the Clarke Road Bridge replacement, EEPAC would have expected the consultant to indicate the width of the buffer was based on the habitat being protected rather than the nature of the development.</p> <p>In addition to site-specific biophysical factors (i.e., soils, slopes, local hydrology), Adamus (2007) asserts that buffer widths must be determined with consideration for:</p> <p>Adjacent land use activities; The amount and configuration of development in the adjacent lands and landscape; The structure and type of vegetation in the buffer; and The particular species the buffer is being designed to protect.</p>	<p>The buffer section of the EIS did not articulate the full extent of the buffers as shown on Figure 8. AECOM has reviewed the buffer section, clarified the recommended buffers and provided rationale for the buffer widths in the enclosed addendum.</p> <p>Note that the buffer width for the eastern property limits is 25m from rear lot-line to the woodland (this includes the 5m from the tree row), along the north eastern limits the buffer is 20m from the rear lot-line to the ESA boundary, and 20m along the north side. The buffers are predominately 20 m + from the proposed ESA boundary (only exception is a small stretch in the SE Subject Lands).</p> <p>see above</p>

EEPAC RECOMMENDATIONS, CONTINUED	RESPONSE FROM AECOM
<p>BUFFERS</p> <p>Significant work has been done on buffers and was summarized by Beacon Environmental in 2012 in work done for the Credit Valley CA, where Adamus is cited. For example: Beacon Environmental on buffers (hyperlink to report)</p> <p>Page 48 of Beacon cites a study McWilliam et al. (2010), of over 180 areas adjacent to 40 different publicly owned forests in southern Ontario. These studies documented encroachments in 99% of areas within 20 m of the forest edge, with the most obvious and severe encroachments recorded within the first 10 m.</p> <p>Page 23 of Beacon also points out that "...studies underscore two important and related points for riparian systems: (1) that forest cover and land uses upstream tend to have a significant impact downstream, so that the benefits of buffers cannot simply be assessed on site-specific scale, and (2) depending on the upstream conditions, even substantial site-specific buffers may not be enough to compensate for broader, landscape-level habitat loss and degradation."</p> <p>Beacon summarized its recommendations in the following table [included in the original letter from EEPAC], which synthesized the work it reviewed and considered buffer widths as high, medium, and low risk of avoiding impacts on adjacent natural features. As indicated on the table, a 10-20 m buffer means a moderate degree of risk to the natural features. 10m is certainly on the low end of that range and 5 m is high risk.</p> <p>RECOMMENDATION 1: A 20 m buffer should be the minimum buffer from the ESA. Furthermore, if only a 10 m buffer is the final figure, any multi-use pathway should be outside the buffer and be in the setback not the buffer.</p>	<p>see above</p>
<p>EEPAC suggests that an even wider buffer is indirectly supported by the consultants on page 37 of the EIS when AECOM points out damage to the ESA is likely during construction.</p> <p>p. 37 "Damage to Adjacent Natural Features - roots may be damaged by machinery and soils may be compacted during grading and construction along the edge of the Kilaly Forest, thereby affecting the health of edge plants. In order to address root damage, it will be necessary to prune roots of adjacent trees during grading and excavation. To avoid compaction of soils, root zones around trees within natural heritage features will need to be fenced. Most areas will be avoided by restricting construction to areas outside the features."</p>	<p>see above</p>
<p>BUFFER ZONE PLANTINGS</p> <p>p. 40 and section 9 discusses plantings of vegetation. Is it going to be required or not? Some places say will (section 9) and in others, 'should be considered'. P. 38 - creation of Ad-hoc Trails - An increase in human presence in natural features adjacent to residential development. Fencing, education, and dense buffer plantings should be considered during the final design stage to deter human intrusion into natural areas." It is not enough to say that people stay on paved trails. It also takes time for native vegetation to grow in and it is not any guarantee of compliance.</p>	<p>Native plantings within the buffers will be a requirement for the development's Site Plan. Furthermore, fencing (without gates) along the rear lot-lines of the residential properties backing onto the ESA and its buffers will be required.</p>
<p>Recommendation 4 on page 46 and Recommendation 10 on page 49 regarding buffer zone plantings are contradictory. Recommendation 10, planting for the multi-use pathway, ignores that multi use pathways are a min of 4 m wide along with a 1 m mowed strip on either side. Therefore there really is no 5 m buffer and the so-called 10 m buffer is in reality nothing of the sort.</p>	<p>The EIS will be updated to address compensation measures. It is suggested that compensation plantings could be done within the ESA within exposed portions of the southwest slope, to improve slope stability in this area.</p>
<p>Infill plantings in the ESA shown on Figure 8 on UTRCA lands is supported provided done in consultation with UTRCA's Forester. A donation from the proponent to the UTRCA to fund this work should be considered to maximize the amount of money towards plantings. (The after tax benefit of a donation might exceed a straight cash requirement)</p>	<p>We have revised the areas for ESA infill plantings to an area along an exposed slope within the ESA community FOM4.</p>
<p>Recommendation 6 includes an edge management plan. There is nothing in the report that states what such a plan is, who does it, when, and who approves it.</p> <p>RECOMMENDATION 2: An edge management plan must be prepared and approved by the City and the UTRCA as a specific condition in the development agreement.</p>	<p>An Edge Management Plan can be part of implementation recommendations for detailed design.</p>

<p>SPECIES AT RISK</p> <p>RECOMMENDATION 3: – EEPAC supports page 37 which recommends consultation with MECF to address potential mitigation measures for American Chestnut and candidate SAR habitat within the Study Area for Chimney Swift, Northern Myotis, Little Brown Myotis and Tri-colored Bat, noting that a permit will be required for removal of barn swallow habitat.</p>	<p>Noted.</p>
<p>RECOMMENDATION 4: EEPAC adds that the UTRCA Forester as well as UTRCA biologist be consulted. The Forester is involved in a variety of tree preservation and tree banks in the Province.</p>	<p>Agreed.</p>
<p>Even though the provincial recovery strategy for American Chestnut (MNRF 2012) recommends “that trees planted for horticulture, landscaping or research be exempt from the habitat regulation, EEPAC points out the Government’s response statement (2013) to the Recovery Strategy for American Chestnuts stated:</p> <p>Identify and assess planted populations of American Chestnut across Ontario to:</p> <ul style="list-style-type: none"> • determine the genetic parentage (i.e., which one or more species of chestnut the tree is derived from) and geographical source of the trees, where possible; • act as potential sources of genetically-resistant trees for future restoration efforts and research purposes; and • reduce the risk of spreading blight from planted chestnut trees to naturally-occurring American Chestnuts. 	<p>The American Chestnut trees recorded were found on the property on the northside of Kilially Road and were confirmed to be planted by the property owner.</p> <p>A letter was sent to MNRF Jan 2019 regarding these trees, however, no response was received.</p> <p>Any further actions with regards to these trees would be the responsibility of the private landowner.</p>
<p>RECOMMENDATION 5: Any change in land use must have a holding provision that requires a detailed environmental management plan that is produced in conjunction with the City plans for the SWM project which will proceed the development.</p>	<p>Noted.</p>
<p>LOSS OF BARN SWALLOW HABITAT</p>	
<p>It is specious to say that a loss of 20 barn swallow nests will result in no net loss because they will be replaced with kiosks. Given the lack of success of kiosks in the London area, it is not supported by the data to say no net impact.</p>	<p>Noted. We will review and consider the location of nesting structures in relation to foraging habitat.</p>
<p>RECOMMENDATION 6: The NE patch of Study Area has meadow habitat and is further from Clarke Rd and the Veterans Memorial Parkway expansion. Consideration should be given to locating the nesting structure(s) there as it falls within the proposed 10 m buffer and includes suitable foraging habitat already.</p>	
<p>RECOMMENDATION 7: Any structures must have capacity for a minimum of 20 nests. A greater number would be better to allow for growth of the colony if the structures prove successful.</p>	<p>Agreed.</p>
<p>EEPAC questions how will success of the structure be monitored? What steps will be taken to promote colonization of the artificial structures if the swallows don't move in on their own (playback of BASW calls etc. could be used in conjunction with monitoring to determine effectiveness of structures). Consideration should be given to reviewing the work of Cole noted in the following web site: https://www.coleengineering.ca/blog/2017/07/saving-ontarios-barn-swallow-population</p>	<p>We will review the linked website. Monitoring of Barn Swallow structures will be added to the Environmental Monitoring Program/Plan. The plan will identify corrective measures for potential failures.</p>
<p>RECOMMENDATION 8: The monitoring plan include the monitoring of replacement barn swallow habitat and other compensatory mitigation be required if the replacement nesting habitat fails before the subdivision is assumed.</p>	
<p>RECOMMENDATION 9: The subdivision, perhaps in the park, contain educational signage / plaques to discuss SAR including the purpose of the barn swallow structures. This seems an excellent opportunity for educating the community living so near the CA and can instill a sense of community pride in the swallows and their habitat.</p>	<p>We agree. We will recommend installation of signage for the barn swallow structures to both decrease disturbance and provide education.</p>
<p>REDUCING HUMAN INTRUSION INTO THE ESA</p>	
<p>The EIS points out on p. 34 Compacted Soils – “A small well used trail is located at the northern edge of the Subject Lands. The trail surface is compacted soil which creates a small void in vegetation and also contributes to the potential for human intrusion into the natural areas further compacting soil within them.”</p>	<p>We will consider including recommendations to rehabilitate the areas where the existing foot trail has resulted in compacted soils.</p>
<p>RECOMMENDATION 10: A condition of the development agreement require the proponent to scarify this trail so that it is visually eliminated to reduce the likelihood of encroachment.</p>	

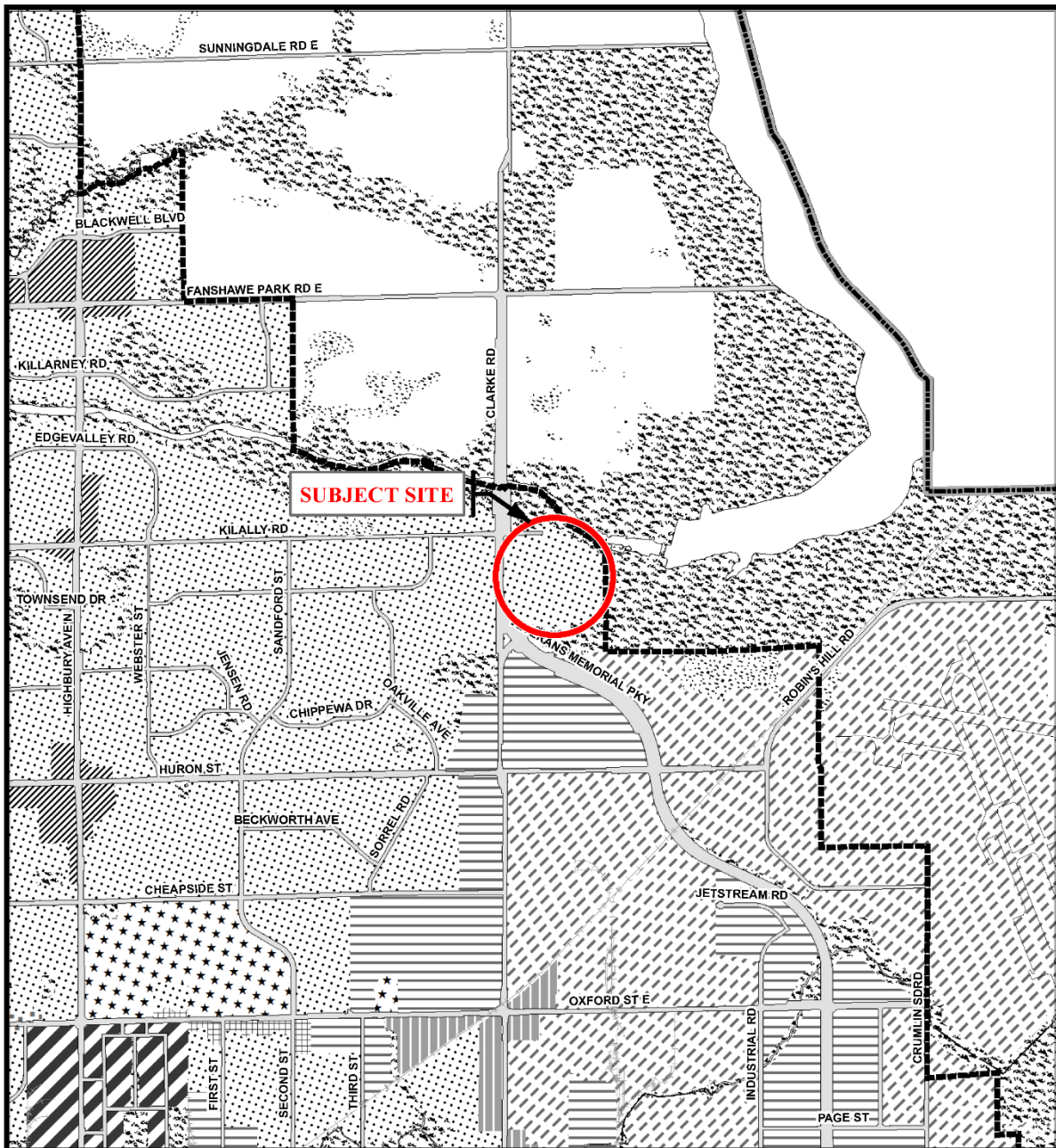
REDUCING HUMAN INTRUSION INTO THE ESA, CONTINUED	
<p>The EIS further notes on page 38 that an increase in human presence in natural features adjacent to residential development. Fencing, education, and dense buffer plantings should be considered during the final design stage.</p> <p>What is "education"? Simply handing people information is not education. Constant reminders in the form of permanent signage would likely be more effective. Signage should explain the significant of the river valley in this location, why it should be protected (left alone). Regular mailings about the ESA including the City's Living with Natural Areas should be provided to residents.</p> <p>EEPAC notes that Figure 7 shows lots within Regulation limits. Can Section 28 approval require signage?</p> <p>EEPAC also notes another reason for signage and significantly more buffering is the presence in the river valley of endangered species.</p> <p>RECOMMENDATION 11: All properties adjacent to the buffer and setback be required to be fenced with no gates.</p> <p>RECOMMENDATION 12: Once 70% of the units are constructed, each unit must receive a copy of the City's Living with Natural Areas brochure. This should be a condition of the development agreement or the City's responsibility</p> <p>EEPAC agrees with the installation of protective fencing during construction as per recommendation 3 of the EIS. However, this is a standard condition.</p> <p>Recommendation 5 of the EIS is standard and supported.</p> <p>EEPAC agrees with Recommendation 1 on p. 44 of the EIS that the delineation of the Kilalily Forest Environmentally Significant Area be amended on Schedule B-1 of the City of London's Official Plan and Map 5 of the London Plan to reflect the boundaries shown on Figure 5 of this report. EEPAC believes this recommendation is already in progress as a result of Council's actions related to the Kilalily Basin SWM EA.</p> <p>RECOMMENDATION 13: If the City has not amended the delineation of the Kilalily Forest ESA, it should be part of the change in land use and zoning related to this application.</p> <p>Recommendation 11 of the EIS proposes that a detailed Environmental Monitoring Program should be prepared prior to the initiation of construction. The questions are: at what point in the process does this occur, who reviews and approves it and what are warranty periods? Further, if encroachment is noted, the program must have some recommendations for how to pay for fixes. Monitoring should be done in conjunction with the City which is building the storm facility. Ideally, such monitoring could be funded from DCs as well as by the proponent.</p> <p>However, Beacon p. 3 noted that monitoring:</p> <p>While monitoring can readily document what is happening within the buffer (e.g., increases in wildlife use or vegetation development for example), and within the core natural area (e.g., shifts in bird species abundance and diversity), only a very carefully designed and well-replicated study with controls may be able to detect if any changes (or lack thereof) in the core habitat are related to the presence (or absence) of a buffer. Often, in real world situations, there are not opportunities to create adequate replicates, or set aside control sites. In addition, monitoring (particularly long-term monitoring) requires both a financial and resource commitment that is beyond the means of most jurisdictions. It also requires individuals who understand the importance of good study design, and are able to make sense of intensive and temporally extensive data, something that is seldom, if ever, undertaken in Ontario for projects under the Planning Act</p>	<p>Agreed. We will revise this section of the EIS to be specific and include signage.</p> <p>Section 28 approval is the jurisdiction of the Upper Thames River Conservation Authority (UTRCA).</p> <p>Noted</p> <p>Fencing without gates will be a condition of the Site Plan Approval for the development.</p> <p>Agreed. Homeowner's packages should include a copy of the City of London's "Living with Natural Areas" brochure.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>To be addressed by the City of London.</p> <p>Noted. This is at the discretion of the City of London.</p>
<p>RECOMMENDATION 14: EEPAC be circulated on the proposed environmental management plan for comment prior to its acceptance by the City.</p> <p>RECOMMENDATION 15: The study design for monitoring be reviewed by the City and UTRCA as a condition of the development agreement.</p>	<p>Agreed.</p>

<p>INDIRECT IMPACTS</p> <p>"Lighting and Noise Impacts – The proposed development will result in an increase in lighting and noise within the Study Area. The introduction of lighting can influence wildlife in natural areas, particularly nocturnal species. The effects of lighting on natural areas may cause certain species of wildlife to move away from the natural areas within the subject lands. In order to limit the potential impacts of light on the adjacent natural heritage features, recommendations will be made to limit or relocate lighting in areas adjacent to natural heritage features and to select lighting standards that minimize diffuse light. Light standards and fixtures can also be shielded to reduce the direct light exposure to natural areas. Dense planting in buffer areas may be considered for noise reduction in select areas."</p> <p>EEPAC is unclear when "recommendations will be made to limit or relocate lighting in areas adjacent to natural heritage features..." It is also unclear what these recommendations will be based on.</p> <p>RECOMMENDATION 16: A condition of the development agreement include shielded light standards and fixtures to reduce direct light exposure by requiring the new City of London Bird Friendly Skies lighting design criteria are followed http://www.london.ca/business/Planning-Development/Pages/Bird-Friendly-Skies.aspx</p>	<p>We will review the recommendation and clarify.</p>
<p>Glass windows placed near an ESA are going to be especially prone to bird collisions. Therefore, EEPAC recommends:</p> <p>RECOMMENDATION 17: Bird-friendly glass materials be used for homes in the development especially those along the outer border facing the ESA. EEPAC or The Advanced Facility for Avian Research at Western University would be pleased to provide detailed information on suitable materials and their application/installation.</p>	<p>Agreed that the requirement for bird friendly glass material be used for homes along the ESA side of the development.</p>
<p>SUBDIVISION DESIGN</p> <p>Is the entrance off Kilally Road necessary? It seems to require eliminating environmentally significant land and will increase traffic on Kilally along the natural heritage leading to increased noise, pollution, runoff, roadkill, and other negative impacts.</p> <p>RECOMMENDATION 18: Have an entrance from Clarke Rd directly on the west side, and leave the north side closed to road traffic from Kilally.</p> <p>EEPAC notes that missing from the EIS is any discussion or mention of the temporary sewage pumping station to be located at the northwest corner of the site. The Sanitary Servicing Report for the site found on the City web site is silent on where any overflows from the pumping station will go. EEPAC assumes it would be to the Thames which would result in negative impacts at the point of discharge and downstream. This missing element from the EIS leaves EEPAC to recommend the following.</p> <p>RECOMMENDATION 19: The application not be accepted until the EIS is modified to deal with the impacts of having a sewage pumping station adjacent to a sensitive habitat.</p>	<p>A direct entrance to the proposed subdivision from Clarke Road is not possible for several reasons: the property does not have frontage on Clarke Road, a Hydro Transmission line runs along Clarke Road, and a direct entrance from Veteran's Memorial Parkway would not be possible.</p> <p>We will add text to address any potential impacts from the temporary pumping station.</p>
<p>CRITIQUE OF EIS FINDINGS</p>	
<p>This document contains vital but missing information that reinforces many of the gaps we considered as part of the EMG review. There are recommendations for pre-construction plans that have not materialized yet. EEPAC would appreciate the opportunity to review these plans.</p>	<p>RESPONSE FROM AECOM</p>
<p>1.1 pg 1 – It is unclear where property access was available and how much of the Study Area and Subject Lands it covered. Did access permit adequate assessment of Study Area? How was this evaluated & assessed?</p>	<p>We will revise figures and text to show where property access was granted and where we assessed.</p>

CRITIQUE OF EIS FINDINGS, CONTINUED	RESPONSE FROM AECOM
<p>Figure 3 pg 11 – How were wildlife monitoring locations determined and deemed sufficient to capture wildlife within the Study Area sufficiently?</p>	<p>Breeding bird point counts were established at three locations (at least 200 m apart to reduce double counting) near the edge of the Subject Lands each adjacent to a different vegetation community to capture the diversity of birds in the Study Area.</p> <p>The amphibian station was established on Kilially Rd adjacent to and within range of the OAO communities, where it was safe for staff to conduct night surveys. No other suitable amphibian breeding sites were identified.</p> <p>Snake cover-boards were placed among tall grasses and forbs in locations with open canopy that would receive significant sunlight throughout the day spaced out along the edges of the Subject Lands.</p>
<p>3.2.3.2 Results pg 20 – It is unfortunate that there were no survey dates in mid-May. July 11 is late for a breeding bird survey as many early breeding species would be finished breeding at this time and may have started to move more widely than during peak breeding activities (mid- May to late June).</p>	<p>This survey, occurring only one day outside of the breeding bird season, did not seem to influence the results. The survey on July 11, 2017 resulted in a large diversity and density of bird species.</p>
<p>3.2.4.2 Results pg 21 – How confident are the surveyors in their survey results given road noise obscured their ability to hear calls? This would appear to be contrary to the accepted protocols for amphibian surveys and calls into question the reliability of the results.</p>	<p>Survey staff were able to hear amphibian species outside of the 100m survey area during a high background noise evening. This shows that if amphibians were present and calling within the 100m survey area, they would have been heard and recorded.</p>
<p>4.2 Provincially Recognized Features and Species. There are recognized bird species observed at Fanshawe CA that are not represented here. Full list on eBird: https://ebird.org/hotspot/1459666</p>	<p>We did not use eBird in our background analysis. We will review and revise the EIS to include any relevant information.</p>

Appendix E – Relevant Background

Map 1 – Place Types

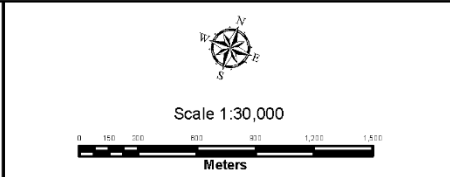


Legend

Downtown	Future Community Growth	Environmental Review
Transit Village	Heavy Industrial	Farmland
Shopping Area	Light Industrial	Rural Neighbourhood
Rapid Transit Corridor	Future Industrial Growth	Waste Management Resource Recovery Area
Urban Corridor	Commercial Industrial	Urban Growth Boundary
Main Street	Institutional	
Neighbourhood	Green Space	

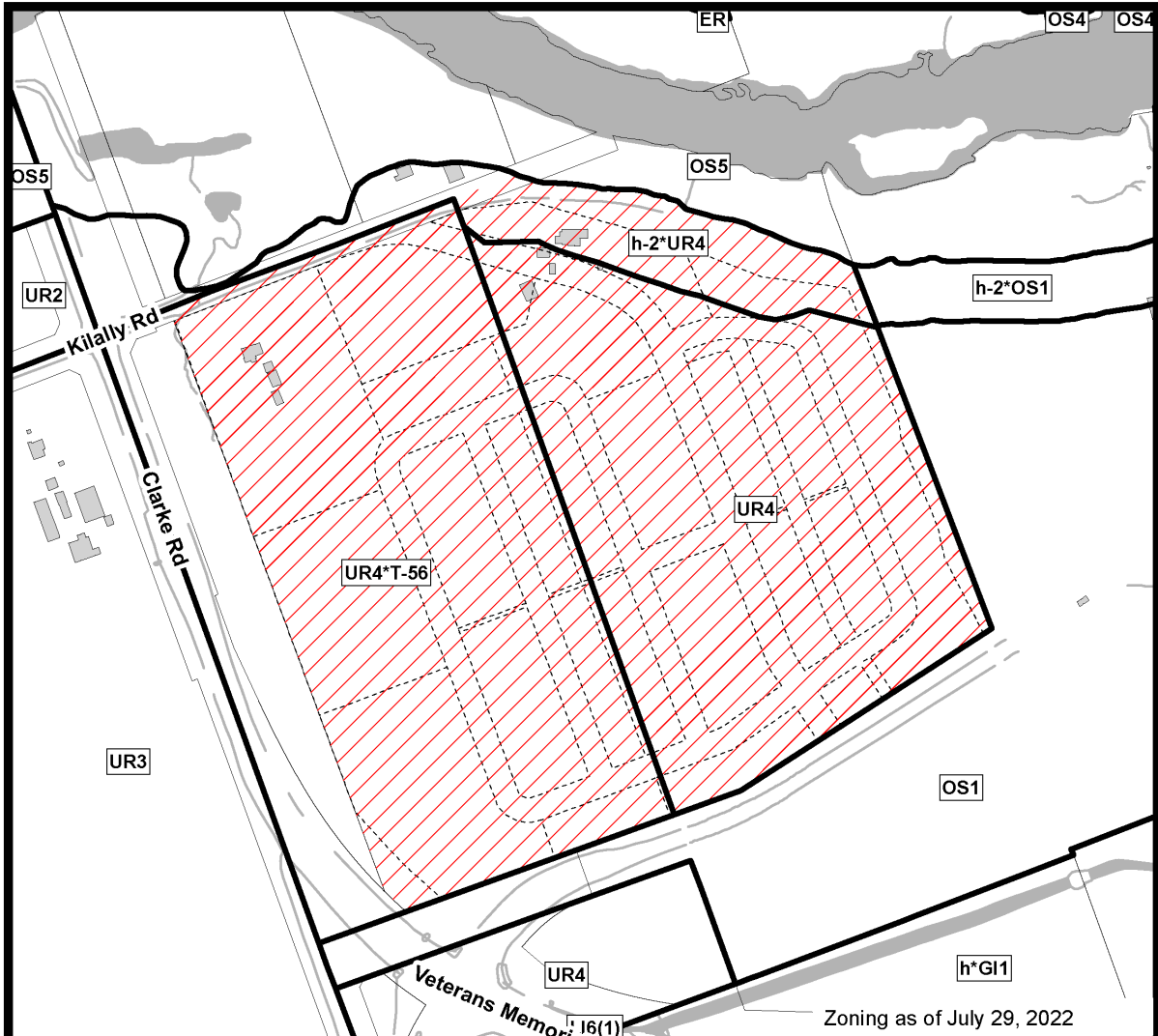
This is an excerpt from Planning & Development's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

CITY OF LONDON
Official Plan
LONDON PLAN MAP 1
- PLACE TYPES -
 PREPARED BY: Planning & Development



File Number: OZ-9244/39T-20502
Planner: LM
Technician: RC
Date: 2022/08/09

Z-.1 Zoning By-law Map Excerpt



 **COUNCIL APPROVED ZONING FOR THE SUBJECT SITE:**

1) **LEGEND FOR ZONING BY-LAW Z-1**

- | | |
|--|---|
| <ul style="list-style-type: none"> R1 - SINGLE DETACHED DWELLINGS R2 - SINGLE AND TWO UNIT DWELLINGS R3 - SINGLE TO FOUR UNIT DWELLINGS R4 - STREET TOWNHOUSE R5 - CLUSTER TOWNHOUSE R6 - CLUSTER HOUSING ALL FORMS R7 - SENIOR'S HOUSING R8 - MEDIUM DENSITY/LOW RISE APTS. R9 - MEDIUM TO HIGH DENSITY APTS. R10 - HIGH DENSITY APARTMENTS R11 - LODGING HOUSE
 DA - DOWNTOWN AREA RSA - REGIONAL SHOPPING AREA CSA - COMMUNITY SHOPPING AREA NSA - NEIGHBOURHOOD SHOPPING AREA BDC - BUSINESS DISTRICT COMMERCIAL AC - ARTERIAL COMMERCIAL HS - HIGHWAY SERVICE COMMERCIAL RSC - RESTRICTED SERVICE COMMERCIAL CC - CONVENIENCE COMMERCIAL SS - AUTOMOBILE SERVICE STATION ASA - ASSOCIATED SHOPPING AREA COMMERCIAL
 OR - OFFICE/RESIDENTIAL OC - OFFICE CONVERSION RO - RESTRICTED OFFICE OF - OFFICE | <ul style="list-style-type: none"> RF - REGIONAL FACILITY CF - COMMUNITY FACILITY NF - NEIGHBOURHOOD FACILITY HER - HERITAGE DC - DAY CARE
 OS - OPEN SPACE CR - COMMERCIAL RECREATION ER - ENVIRONMENTAL REVIEW
 OB - OFFICE BUSINESS PARK LI - LIGHT INDUSTRIAL GI - GENERAL INDUSTRIAL HI - HEAVY INDUSTRIAL EX - RESOURCE EXTRACTIVE UR - URBAN RESERVE
 AG - AGRICULTURAL AGC - AGRICULTURAL COMMERCIAL RRC - RURAL SETTLEMENT COMMERCIAL TGS - TEMPORARY GARDEN SUITE RT - RAIL TRANSPORTATION
 "h" - HOLDING SYMBOL "D" - DENSITY SYMBOL "H" - HEIGHT SYMBOL "B" - BONUS SYMBOL "T" - TEMPORARY USE SYMBOL |
|--|---|

CITY OF LONDON

PLANNING SERVICES / DEVELOPMENT SERVICES

**ZONING
BY-LAW NO. Z.-1
SCHEDULE A**



THIS MAP IS AN UNOFFICIAL EXTRACT FROM THE ZONING BY-LAW WITH ADDED NOTATIONS

FILE NO:
OZ-9244/39T-20502 LM

MAP PREPARED:
2024/02/28 RC

1:5,000
0 25 50 100 150 200
Meters