

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: Draft Land Needs Assessment of The London Plan
File O-9595
Public Participation Meeting

Date: June 11, 2023

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the Section 26 Official Plan Review of The London Plan and Land Needs Assessment:

- (a) That the proposed by-law attached hereto as Appendix "A" to adopt Phase 1A of the Section 26 Review of The London Plan, **BE INTRODUCED** at the Municipal Council meeting being held on June 25, 2024 and **BE FORWARDED** to the Ministry of Municipal Affairs and Housing for approval;
- (b) That the Minister of Municipal Affairs and Housing **BE ADVISED** that Municipal Council declares that Phase 1A of the Section 26 Review of The London Plan does not conflict with provincial plans, has regard to the matters of provincial interest, and is consistent with the Provincial Policy Statement.
- (c) That the draft Land Needs Assessment (Community Growth) attached hereto as Appendix "B" **BE RECEIVED** for continued consultation with the community and development industry, and during future meetings of the Housing Supply Reference Group.
- (d) That notwithstanding the Council-approved corporate growth projections for 2021-2051, the 2023 Ministry of Finance population projections **BE ENDORSED** for use as the basis for the Land Needs Assessment of The London Plan and Urban Growth Boundary Review; and
- (e) That this report **BE RECEIVED** for information.

IT BEING NOTED THAT Appendix "A" under clause (a) above, which is adopting Phase 1A of the Section 26 Review of The London Plan, incorporates the following matters and materials:

1. Changes to references to the planning horizon of The London Plan from 20 years to 25 years;
2. Greenfield density target (as set out in the draft Provincial Policy Statement, 2024); and
3. Industrial Conversion amendments, including changes from Industrial Place Types or adjacent Place Types within Industrial nodes or corridors to other non-Employment Place Types of The London Plan.

IT BEING FURTHER NOTED that following additional consultations, the Land Needs Assessment for Community Growth will be presented to future meetings of Council. The Industrial Land Needs assessment will also be presented to a future meeting of Council.

IT BEING FURTHER NOTED the Council-approved Growth Projections will be used for all other corporate initiatives, including the 2028 Development Charges Background

Study.

Executive Summary

The purpose of this report is to seek Council direction on Phase 1A of the Official Plan Review of The London Plan and Land Needs Assessment for Community Growth. Phase 1A includes a greenfield density target consistent with the draft Provincial Planning Statement (PPS) and recommended Industrial Conversions from Industrial Place Types or adjacent Place Types within industrial nodes or corridors to other non-Industrial Place Types of the London Plan.

Following Council direction on April 2, 2024, it is recommended that amendments related to a 25-year planning horizon and approved industrial land conversions be adopted by Council and forwarded to the Ministry of Municipal Affairs and Housing for Provincial approval under Section 26 of the Planning Act. The new draft Provincial Planning Statement (PPS) also introduces growth management changes which are recommended to be incorporated into the Official Plan review of The London Plan. The Phase 1A amendment attached to this report includes a London Plan Amendment for a greenfield density target, consistent with the Provincial policy direction.

Second, this report includes a draft Land Needs Assessment (LNA) for community growth land uses. This draft is for continued consultation with the community and development industry partners, noting that the 25-year planning horizon and 2023 Ministry of Finance population growth forecast have been incorporated into the draft review. The Province's minimum greenfield density target is also included in the draft LNA for community growth uses, and this minimum value has a significant impact on the land need that is identified in the draft LNA. A separate Industrial land needs assessment will be presented to a future meeting of Council, targeting Q3 2024. As such, the draft LNA in this report reviewed land use demands for residential, institutional, and commercial land uses.

The draft LNA has identified an overall need of a minimum of 450 hectares of additional lands to be added to the municipality's urban area for new residential uses. The 450 hectares value is for fully developable lands and does not include natural heritage, natural hazard, and other community land uses to create complete communities, so depending on the lands added to the Urban Growth Boundary in future, the total hectareage of the urban expansion has the potential to vary greatly compared to the number of hectares identified as the residential need. The findings of the Draft LNA (Community Growth) will be subject to continuing consultation.

Staff are recommending extending the consultation period for this project based on comments that have been received to date. Part of this consultation will include a series of further meetings with the Housing Supply Reference Group. As such, the LNA is presented as a draft for the purposes of additional community and housing industry review.

Lastly, this report notes several related City of London initiatives, such as the Targeted Actions to Increase London's Housing Supply and policy reviews related to the Federal Housing Accelerator Fund (HAF). These initiatives will continue in parallel with the forthcoming phases of the Official Plan Review and will inform future recommendations to Council.

The amendments in Appendix A constitute Phase 1A of the Section 26 Official Plan Review of The London Plan. In Accordance with the *Planning Act*, the approval authority is the Provincial Ministry for Council-adopted Official Plan Reviews. The amendments do not conflict with provincial plans, have regard to the matters of public interest, and are consistent with the Provincial Policy Statement 2020 and proposed new PPS, as well as the vision and key directions of The London Plan.

Linkage to the Corporate Strategic Plan

The Official Plan Review under Section 26 of the *Planning Act* will contribute to the

advancement of Municipal Council's 2023-2027 Strategic Plan in the following ways:

- **Strategic Plan Area of Focus: Housing and Homelessness**, by ensuring London's growth and development is well-planned and consider use, intensity, and form.
- **Strategic Plan Area of Focus: Climate Action and Sustainable Growth**, by ensuring infrastructure is built, maintained and secured to support future growth and protect the environment.

Discussion and Analysis

1.0 Background

In December 2022, Council approved growth projections for the 2021-2051 time period. Subsequently, an Official Plan Review of The London Plan was initiated under Section 26 of the *Planning Act*. Terms of Reference for the Review were presented at a special meeting of Council on April 11, 2023.

Noting proposed changes to the Provincial Policy Statement issued by the Province in April 2023, the Official Plan Review was paused in July 2023; however, the Land Needs Assessment component of the review was continued to address housing and land use supply needs.

After consulting with Ministry of Municipal Affairs and Housing staff, the City reinitiated the Section 26 Official Plan Review as a phased review in March 2024. A future special meeting before Council will be held if updates to the review's 2023 terms of reference are required based on any changes to the PPS or other legislation.

The following report includes phase 1A of the review for Council's adoption and circulation to the Ministry for provincial approval. It also includes a draft LNA for further consultation.

2.0 Draft 2024 Provincial Planning Statement

On April 10, 2024, the Province released an updated draft Provincial Planning Statement (PPS) on the Environmental Registry of Ontario with a commenting deadline of May 12, 2024.

While not yet approved as of the time of writing of this report, the draft 2024 PPS identifies Provincial direction for the land use policy framework in Ontario, and includes significant changes pertaining to the Official Plan Review and Land Needs Assessment as follows:

- Municipalities' population and employment growth forecasts shall be based on Ministry of Finance 25-year projections and may be modified as appropriate (draft 2024 PPS policy 2.1.1).
- Municipalities are encouraged to establish density targets for "designated growth areas" (i.e. Greenfield areas), while a target of 50 residents and jobs per gross hectare is encouraged in these areas for large and fast-growing municipalities (including London). Municipalities may go beyond the minimum target and revisit it at the time of each official plan update (draft 2024 PPS policy 2.3.1.5).
- Designated growth area is redefined to include lands added to settlement areas that have not yet been fully developed.

Additionally, the draft 2024 PPS proposes several changes to Industrial lands, which will be brought forward in the subsequent Industrial Land Needs report. Those changes include a new definition of "Employment Area" in alignment with the *Planning Act* definition of "area of employment", which is:

“those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. An employment area also includes areas of land described by subsection 1(1.1) of the Planning Act. Uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above.”

Stand-alone institutional, commercial, retail and office uses are not considered part of Employment Area. The Industrial Place Types of The London Plan currently permit many of the uses that would be excluded from the definition of “Employment Areas”.

The draft 2024 PPS encourages industrial, manufacturing and small-scale warehousing uses in strategic growth areas and other mixed-use areas outside of employment areas. Such light industrial uses are permitted in the Commercial Industrial Place Type of The London Plan. The Commercial Industrial Place Type permits primarily commercial uses (i.e., retail and office), and therefore has been evaluated as commercial in the draft Land Needs Assessment land calculations.

Additional review of Industrial Place Type policies is anticipated in a subsequent phase of the Official Plan Review. Subject to a new PPS, the potential changes to The London Plan may include, but are not limited to, the definition of “Employment Areas”, mapping and policies pertaining to the employment areas.

Phase 1A of the Official Plan Review does not conflict with provincial plans, has regard to matters of provincial interest, is consistent with the Provincial Policy Statement 2020 and consistent with direction of the proposed 2024 Provincial Planning Statement.

3.0 Growth Projections

On December 13, 2022, Council endorsed the Reference Growth Scenario outlined in final report prepared by Watson and Associates Economists entitled “Population, Housing and Employment Growth Projection Study, 2021-2051”. The Reference Scenario was endorsed as the City of London’s corporate growth forecast, including for use in *Planning Act* and *Development Charges Act* initiatives.

On April 2, 2024, Council directed staff to apply the 25-year planning horizon to the Land Needs Assessment.

On April 12, 2024, the Province released a new draft *Provincial Planning Statement* on the Environmental Registry of Ontario. The new draft policy proposed further changes to the growth management policy framework and added direction related to the application of growth forecasts:

As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ministry of Finance 25-year projections and may modify projections, as appropriate. (Policy 2.1.1)

Notwithstanding that Council approved corporate growth projections in December 2022, the draft LNA applies the 2023 Ministry of Finance population projections for land use purposes, consistent with the new PPS direction. Noting the Council-approved Growth Projections will be used for all other corporate initiatives, including the 2028 Development Charges Background Study.

As per the new draft policy direction, the Ministry of Finance annual population projections (2022 to 2046) were applied to the land demand calculations. To combine the Ministry of Finance projections with the Council-endorsed projections, the land demand calculations incorporate the most recent Ministry of Finance population dataset while maintaining the Council-endorsed assumptions related to employment activity rates, gross floor area calculations, and housing splits.

The Ministry of Finance population projections for the Middlesex County includes the City of London. The share of London’s population has been 84% of the Middlesex

County population from 2001 to 2021, which was considered in the Council-approved projections. For the purposes of the LNA, the City's population share was maintained over the planning horizon.

3.1 Land Demand – Residential

Residential land demand contemplates the 45% intensification target over the Council approved 25-year planning horizon. The expected housing share (or "housing split") factored into the demand calculation city-wide includes 27% low density residential (LDR), 28% medium density residential (MDR), and 45% high density residential (HDR). Furthermore, the anticipated housing unit per hectare (UPH) applied in the Vacant Land Inventory (VLI) results in 20 UPH for LDR, 44 UPH for MDR, and 125 UPH for HDR. These density assumptions are reflective of current housing trends and assumptions of mixed housing forms to create new complete neighbourhoods. The density assumptions are in conformity with new draft PPS direction related to 50 residents or jobs per gross hectare, and meet the minimum 20 units per hectare (averaging 2.5 persons per unit).

The resulting land demand for residential land use was calculated as 1,866 hectares in Greenfield, comprising 1,335 hectares for LDR, 426 hectares for MDR and 106 hectares for HDR development.

3.2 Land Demand – Institutional

The Institutional sector is expected to maintain steady growth post-pandemic with the annual employment growth rate of 2.2% over the 25-year planning horizon. In response to this anticipated growth, the sector is projecting Gross Floor Area (GFA) growth with an average of 91,951m² of development annually. Land demand calculations assumed an average floor space per worker (FSW) of 65m², an assumed Floor Area Ratio (FAR) of 0.42, and an assumed intensification of 82%. The above noted assumptions are representative of non-residential density trends and account for the varied land uses within the sector. It should also be noted that the GFA creation for the sector does not follow a linear annual growth rate due to the nature of the sector and external funding mechanisms impacting capital funding decisions for institutional organizations.

The resulting demand for institutional land use was calculated as 547 hectares and 99 hectares in Greenfield.

3.3 Land Demand – Commercial

The Commercial sector anticipates a strong recovery through the 2021 - 2026 timeframe following the significant upheaval within the sector due to high unemployment rates through the COVID-19 pandemic. It should be noted that the recovered employment numbers were not included in GFA calculations understanding that the recovery would be accommodated in pre-existing commercial space. The sector is representative of the combined calculation of future office and retail needs due to the highly similar trends in greenfield development. In response to the service needs associated with population growth, the sector is projecting GFA growth averaging 66,702m² of development annually over the 25-year planning horizon. Land demand calculations assumed an average FSW of 34m² an average FAR of 0.3, and an assumed intensification of 45% to correspond with residential trends. Based on Key Directions in The London Plan (policy 59) and a review of current commercial Place Types, a commercial split of 87% mixed-use and 13% standalone commercial development by Place Type was incorporated into the land calculations. The assumptions account for the shift to smaller commercial footprints, a significant change in office usage, and the policy-based focus on mixed-use development and inward growth.

The resulting demand for commercial land use was calculated as 72 hectares and 40 hectares in Greenfield.

3.4 Land Demand - Summary

Below is a table summarizing the growth projection demand by greenfield land area:

Land Use Category	Greenfield Demand (Ha)
Residential – Low Density Residential	1,335
Residential – Medium Density Residential	426
Residential – High Density Residential	106
Institutional	99
Commercial	40

Table 1. City of London's Residential and Non-Residential Land Demand (2022-2046)

4.0 Land Supply

4.1 Vacant Land Inventory

The City's Vacant Land Inventory (VLI) tracks vacant land for potential development within the City's Urban Growth Boundary and is comprised of two different studies: residential and non-residential (i.e., industrial, commercial, and institutional). The VLI is updated quarterly and released annually to reflect the most up-to-date capacity for future residential and non-residential development at a snapshot in time. The VLI includes categories of development with density assumptions for vacant lands as well as development applications within the "development pipeline".

For the purposes of the draft Land Needs Assessment, the VLI has been updated to align with street typologies and place types in The London Plan. The maintenance of the VLI is consistent with policy direction conforming with the new draft PPS (draft policy 2.1.4) and current PPS (policy 1.4.1) related to residential land supply to accommodate growth. Additionally, density assumptions applied to the VLI conform with new draft PPS direction (draft policy 2.3.1.5) which states that large and fast-growing municipalities are encouraged to plan for a target of 50 residents and jobs per gross hectare.

4.2 Land Supply: Contingency and Market Responsiveness

On April 23, 2024, Council approved the Targeted Actions to Increase London's Housing Supply: Supporting Council's Pledge for 47,000 Units by 2031. The Targeted Actions report notes that the LNA will include consideration of housing supply contingency to ensure an appropriate supply is available in the short and long-term and able to meet periods of higher-than-anticipated growth.

As part of this Section 26 Official Plan review, the planning horizon has been extended from 20 years to 25 years. This means that an additional five years of growth is required to be included within population, housing, and employment space forecasts. The additional 5 years is also required within the vacant land supply within the City's Urban Growth Boundary. This change to 25-years was made in response to the first draft of the PPS released in 2023, which identified a minimum of 25-years planning horizon. The 2024 draft PPS released in April 2024 identifies a range of planning horizon from at least 20 years but not more than 30 years. The 25-years horizon which Council approved in April 2024 is consistent with both the in-force PPS and the draft PPS.

The 2020 PPS (policy 1.4.1.a) directs municipalities to maintain a minimum of 15 years of designated land available for development. The draft 2024 PPS continues this policy requirement of a minimum 15 years of land supply (draft policy 2.1.4.a).

The City is required to review and update its official plan within every five years (*Planning Act*, s. 26(1.1)(b)) for the rest of the planning horizon. The Targeted Actions Report also states the City will conduct a housing supply review every 5 years or less. By introducing a 25-year planning horizon, flexibility is built into the growth management process. This exceeds the PPS requirement of 15 years designated supply, and is intended to address periods of higher-than-expected growth in population, housing or employment. The Targeted Actions report also identifies the development of an

intensification inventory for monitoring opportunities within the existing built-up area, which may impact future land supply and recommendations on land needs reviews.

As well as the additional land supply required to be accommodated in the UGB through an extended Planning Horizon, the MOF projections are able to be responsive to changes in market demands. There is responsiveness built into the projections, with the projections demonstrating higher growth than has been seen when compared to actual built units per year in the city. The annual average of actual builds has been 2,530 units per year over the last ten years (2014-2023), whereas the MOF projection is for 4,466 units per year for the 25-year planning horizon. (Noting that the first time period for MOF is 4 years in length rather than 5). By comparison, the Council-approved projection is for 3,294 units per year over the planning horizon. Below in Figure 1 is a chart showing a comparison of annual actual builds versus annual projected growth (with projections grouped in 5-year brackets).

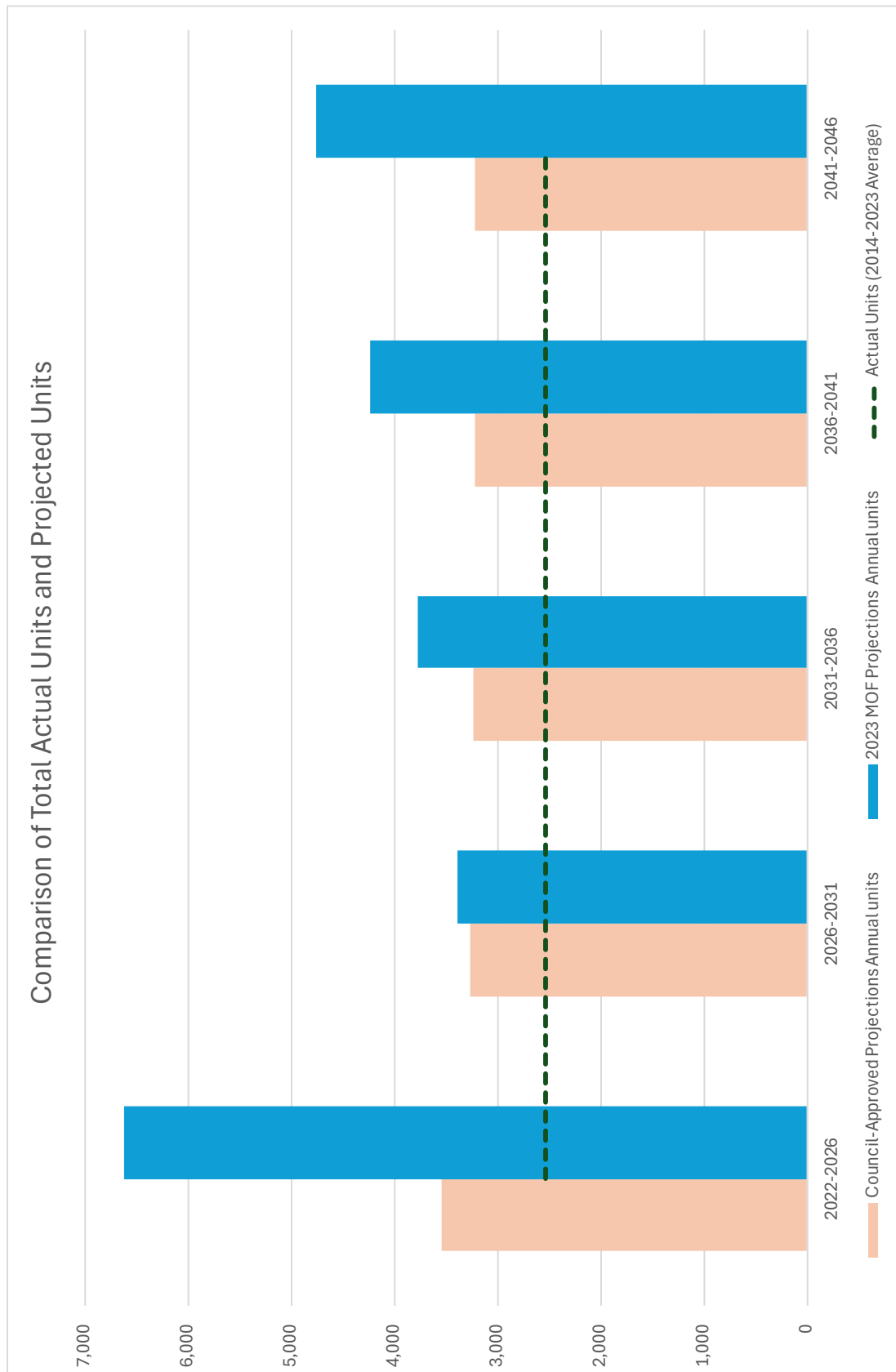


Figure 1: Comparison of Actual Builds (10-year Annual Average) versus Annual Averages of Growth Projections

The current contingency amount that has been included in the draft land needs analysis includes:

- a) Council approval of change of the planning horizon from 20 years to 25 years. Based on the Council-approved projections, this requires accommodation of an additional 16,070 units.
- b) Moving from the 2022 Council-approved population projections totals to the 2023 Ministry of Finance population projections. This change requires accommodation of an additional 28,374 units.

The total contingency amount identified in this report is 44,444 units (16,070 units + 28,374 units as noted above) based on interpretations of the current and draft PPS documents, and the Council-approved extension of the planning horizon to 25 years.

5.0 Resulting Land Need

5.1. Residential

At the end of the 25-year planning horizon, the City has a surplus of 49 hectares of MDR lands and 213 hectares of HDR lands but has a deficit of 462 hectares of lands for LDR units, as indicated on Table 2.

There is an identified need for additional residential lands by 2046.

Structure Type	Greenfield Units Supply	Greenfield Units Demand	Greenfield Units remaining at 2046	Greenfield Land (Ha) remaining at 2046
Low Density Residential	17,461	26,705	-9,244	-462
Medium Density Residential	20,869	18,726	2,144	49
High Density Residential	39,816	13,196	26,621	213

Table 2. Residential Greenfield Land Needs (2022-2046)

5.2 Commercial

At the end of the 25-year planning horizon, there will be remaining a balance of 18 hectares of lands to accommodate commercial growth. As noted in the land calculation assumptions, it is expected that most of the commercial demand will be absorbed into mixed-use development rather than standalone commercial development. As such, despite high growth expected in the sector, there will be sufficient greenfield lands.

Calculations of commercial lands include the Commercial Industrial Place Type of The London Plan, consistent with the draft PPS.

There is **no** identified need for additional commercial lands by 2046.

5.3 Institutional

At the end of the 25-year planning horizon, there will be a remaining balance of 38 hectares of lands to accommodate institutional growth. The high intensification rate applied to the land calculation is representative of development trends and has resulted in much of the demand being accommodated within the Built Area.

There is **no** identified need for additional institutional lands by 2046.

Below is a table summarizing the commercial and institutional greenfield land needs over the planning horizon.

Type	Greenfield Land Supply (Ha)	Greenfield Land Demand (Ha)	Greenfield Land (Ha) remaining at 2046
Commercial	58	40	18
Institutional	137	99	38

Table 3. Commercial and Institutional Greenfield Land Needs (2022-2046)

5.4. Urban Growth Boundary Expansion

Based on the results of the draft LNA, the City needs to consider including additional land within the Urban Growth Boundary (UGB). A set of evaluation criteria, in alignment with policy 76 of The London Plan, is attached as Appendix C to this report. Consistent with the current PPS and the new draft PPS, the criteria are intended to support the evaluation of the most appropriate lands to be considered for inclusion within the UGB.

Certain landowners have already submitted requests to the City for sites to be evaluated, and those requests previously submitted to Staff are shown in Appendix D. Further requests will be received at the time of adoption of a finalized LNA.

6.0 Amendments to The London Plan

As noted in section 3.0 of this report, in April 2024 Council approved the extension of the planning horizon for the basis of The London Plan. Schedule 1 of Appendix A to this report contains amendments to the Plan to change the planning horizon from 20 years to 25 years.

Also attached to this report in Schedule 2 of Appendix A, is an amendment to add a new policy that is consistent with the new draft PPS direction regarding a greenfield target of 50 residents and jobs per gross hectares (policy 2.3.1.5). As previously mentioned, the greenfield target was considered in the land needs calculations. The inclusion of the greenfield target in The London Plan supports building a mixed-use compact city (policy 59 of the Plan), by encouraging a mix of housing types and planning to achieve a compact, contiguous pattern of growth.

7.0 Industrial Land Conversion

On April 2, 2024, Council approved the inclusion of six (6) sites for industrial land conversion to a non-industrial place type and deferred the final evaluation of one (1) site noting that additional background materials were being submitted. Following the March 19, 2024, Planning and Environment Committee, further requests were received related to evaluation for industrial conversion. These additional requests were submitted after the September 8, 2023, deadline however the additional sites have been evaluated and included within this report. Schedules 3 through 10 of Appendix A contain applicable Official Plan Amendments for adoption. Appendix E contains the completed evaluation criteria matrix for the additional Industrial conversions.

7.1. 2496 Dundas Street

On April 2, 2024, Council approved an amended motion (clause c) to defer evaluation of the requested Dundas Street lands pending receipt of background materials. Staff have since received the background materials, and the request has been re-evaluated against the industrial land conversion criteria.

A Noise Exposure Forecast (NEF) identifies compatible land uses adjacent to airports. The subject site is adjacent to the London International Airport. A boundary delineation exercise for the NEF contour lines indicated that the property is located between the 28 and 30 contours noting that the potentially developable lands are located below the 30 NEF contour. Residential use could be permitted with required warning clauses and

design features as noted in the submitted Noise and Vibration Impact Assessment Report.

The submitted Subdivision Development Environmental Impact Study/Subject Land Status Report does not meet the evaluation criteria which states, “property does not demonstrate significant environmental constraint for reuse as another land use/Place Type”. The subject lands contain unevaluated features, and the submission does not meet the application of Environmental Management Guidelines (EMG). Updated studies would be required as part of a subsequent development application process. Confirmed components of a standalone Subject Land Status Report (SLSR) to verify the delineation of the presumed Significant Woodland is a required component of a complete application. An Environmental Impact Study (EIS) applying appropriate buffers and assessing the environment impact of development on the feature is a requirement of approval.

The proposed design strategy for municipal servicing will involve substantial costs as well as traffic management plans along an Arterial Road. The proposed design does not represent orderly development because it does not account for additional and/or adjacent lands. Engineering Division noted that these constraints could be resolved through a Secondary Plan or through evaluation as part of a master servicing review.

Recommendation: Based on the industrial land conversion evaluation criteria, conversion is **recommended**, noting that redesignation to Neighbourhoods Place Type is not an approval of the conceptual development submitted in the background materials (See Appendix E). The industrial conversion amendment is attached to this report (see Schedule of 3 Appendix A).

7.2. 2251, 2253, and 2257 Trafalgar Street

On April 2, 2024, Council approved an amended motion (clause e) to include the Trafalgar Street lands for industrial conversions to non-Industrial Place Types. Staff recommended refusal based on the industrial land conversion evaluation criteria. On April 12, 2024, the Province released a new draft Provincial Planning Statement which included notable amended policies related to the approved industrial land conversion:

Planning authorities shall protect employment areas that are located in proximity to major goods movement facilities and corridors, including facilities and corridors identified in provincial transportation plans, for the employment area uses that require those locations (Policy 2.8.2, subsection 2)

Planning authorities may remove lands from employment areas only where it has been demonstrated that:

a) there is an identified need for the removal and the land is not required for employment area uses over the long term;

b) the proposed uses would not negatively impact the overall viability of the employment area by:

1. avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts to existing or planned employment area uses in accordance with policy 3.5;

2. maintaining access to major goods movement facilities and corridors (Policy 2.8.2, subsection 5)

The inclusion of the Trafalgar lands is not consistent with draft provincial policy based on the proximity to a major goods movement corridor and the potential negative impact to viability of an adjacent existing or planned employment area use. Notwithstanding, the Industrial conversion amendment is attached to this report (see Schedule 4 of Appendix A), at the direction of Council, April 2, 2024.

7.3. York Street – Colborne Street to Rectory Street

On April 2, 2024, Council approved the industrial conversion of York Street's Commercial Industrial Place Type parcels to Urban Corridor Place Type, between Colborne Street and Rectory Street. To implement the vision of the Urban Corridor Place Type along York Street, Civic Administration recommend redesignation of the

entire corridor from Colborne Street to Rectory Street. This primarily includes Commercial Industrial Place Type parcels as directed on April 2, 2024, but also adds certain parcels designated as Neighbourhoods Place Type. Schedule 9 of Appendix A includes mapping amendments for the entirety of this corridor.

7.4. Former Kellogg Lands

On April 2, 2024, Council approved the conversion of the Light Industrial former Kellogg factory area. The attached bylaws for these lands are to convert to Neighbourhoods Place Type (Schedule 5 to Appendix A) and to Transit Village Place Type (Schedule 6 to Appendix A). The conversion to Neighbourhoods Place Type applies to the properties at 311 – 335 Eleanor St, 1178 – 1182 York St, and 1181 King St. The remainder of the Light Industrial area is converted to Transit Village Place Type. It being noted that a Transit Village Policy review is separately underway for policy 817. Policy 817 notes that new Transit Villages are not anticipated, based on growth forecasting. However, there are fundamental changes to projections and growth management, as are identified in this Land Needs Assessment. The results of the Transit Village policy review are anticipated to be brought to Council in Q3 2024.

7.5. Additional Site Evaluations

Following the March 19 Planning and Environment Committee report, staff received additional requests to be considered for industrial land conversion. Two (2) additional requests were received from interested parties. The evaluation and recommendations on these additional sites have been included in this report.

7.5.1 2550 Dundas Street

Landowner has requested conversion from Light Industrial Place Type to an urban residential place type. The vacant property is approximately 5.18 hectares and is comprised of farmland and a deciduous swamp containing unevaluated natural features. The site does not have access to municipal servicing however, as noted in the re-evaluation of the 2496 Dundas Street property, fulsome servicing works could be included for consideration in future infrastructure strategy. The majority of the property is located above the 30 NEF contour, adjacent to the London International Airport. The *Provincial Policy Statement* (policy 1.6.9.2a) prohibits new residential development and other sensitive land uses in areas near airports above 30 NEF – the new draft Provincial Planning Statement maintains this prohibition (policy 3.4.2a). Staff informed the landowner of this prohibition during a meeting on April 19, 2024.

Recommendation: Based on the industrial land conversion evaluation criteria, conversion is **not recommended**.

7.5.2 3317 White Oak Road

On November 7, 2023, Council approved a zoning by-law amendment submitted by the current landowner of 3317 White Oak Road for the property to be amended to a holding Light Industrial zone from an Urban Reserve zone. This recent zone change conforms with the existing Light Industrial Place Type under *The London Plan* and Industrial designation under the *Southwest Area Secondary Plan*.

Landowner has now submitted a request for conversion of the Light Industrial Place Type to Shopping Area Place Type or a similar designation to permit mixed-use residential development. On April 30, 2024, the landowner met with staff and indicated interest in pursuing a highly intensive mixed-use residential development of sixteen (16) storeys. The property is approximately 4.02 hectares and comprised of vacant land.

The subject lands are roughly 30m from an existing Class III industrial operation that requires a Minimum Separation Distance (MSD) as prescribed under the Province's *D-series Guidelines*. The purpose of the separation distances is to ensure safe and compatible use of land adjacent to Industrial users and the continued operation of the planned Industrial uses. Policy 1115_9 of *The London Plan* requires implementation of the Province's *D-series Guidelines* to ensure that industrial use and sensitive land uses are not located inappropriately close. The Class III MSD setback prohibits the residential use on 3317 White Oak Road.

The abutting industrial operation at 3300 White Oak Rd has consistently been categorized as a Class III industrial facility, per Provincial direction, since the approval of the original North Longwoods Area Plan (adopted July 7, 2003). Class III setbacks were confirmed in a recent AECOM study from January 22, 2021, related to a residential development located north of the subject lands.

Staff also conducted a phone conversation with the industrial facility operator on April 30, 2024, which confirmed that business hours have changed but that there has been no change to the nature of on-site industrial business operations since the 2021 study. The operations are Class III Industrial operations related to paint manufacturing.

On April 26, 2024, the applicant provided a D-Series report to Staff, which proposed downgrading the classification from Class III to Class II. Staff have significant concerns related to the results of the D-series Study provided by the applicant. Under the *D-series Guidelines*, The applicants' D-Series Study provided insufficient evidence to demonstrate a change in the operations of the abutting paint plant. There is insufficient evidence to indicate that the classification of the industrial facility should be lowered compared to previous direction from the Province and evidence from previous studies completed in this area. A Class III facility requires a 300m buffer to ensure land use compatibility whereas a Class II facility requires a 70m buffer. Buffers are required to be measured from the Industrial property line. Concerns related to Minimum Separation Distance buffers and land-use compatibility have not been resolved and therefore no recommendation can be made for conversion.

Additionally, a proposed new mixed-use high-density place type such as Shopping Area Place Type does not conform with the Shopping Area policies in *The London Plan*. Policy 880 states that it is not expected that the Shopping Area Place Type will need to be expanded and applications for new areas designation will be discouraged. Policy 881 requires both the clear demonstration of need for proposed designation as well as demonstration that the proposal will not detract or undermine the planned function of an existing Shopping Area or another other place type. A special policy area in under another Place Type is also not appropriate based on D-Series requirements for sensitive land uses adjacent to the paint manufacturing.

The landowner was made aware of preliminary concerns and was provided opportunity to respond prior to final evaluation. Staff note that the response materials did not provide adequate evidence to justify their inconsistent classification of the industrial facility nor the introduction of an incompatible high-density sensitive land use within an industrial-designated area under The London Plan and Southwest Area Plan.

Recommendation: Based on the industrial land conversion evaluation, conversion is **not recommended**.

8.0 Consultations

The City of London has undertaken ongoing consultations with the development and homebuilding industries. Feedback has been received through the Housing Supply Reference Group (HSRG) and through the Growth Management Implementation Strategy (GMIS) annual update interview process.

The HSRG met monthly for approximately the last year. One-on-one GMIS developer interviews were held over April 2024. Additional industry and community consultations were held on May 23, 2024 and May 29, 2024 to discuss land needs process, the implications of the new draft PPS, and to identify preliminary findings.

Through these consultations, development partners have been clear that increasing the land supply for residential land uses is essential to ensuring a sufficient housing supply. Feedback received through the Housing Supply Reference Group and Growth Management Implementation Strategy (GMIS) also focused on vacant land inventory methodology and the creation of a land supply contingency to be able to accommodate higher than anticipated population growth. Feedback has also focused on the

methodology applied in the VLI and the creation of a land supply contingency to accommodate higher than anticipated population growth forecasts.

As noted in Sections 3 and 4 of this report, recent changes to Provincial direction have resulted in land demands being calculated based on MOF 25-year population projections. Greenfield density assumptions are also based on consistency with the recent Provincial direction for municipal density targets. Land supply contingency and market responsiveness have been incorporated through Council's direction to apply an extended planning horizon and through these projections being based on MOF 25-year population projections. Additional land contingency beyond 25-years is not consistent with the current in-force Provincial Policy Statement. Guidance available through the Ministry of Finance growth projections is also for 25-years, up to 2046.

Any further rationale for additional contingency would require a third party to be engaged to undertake an analysis of housing supply in London. Council direction would be required to engage a third party to undertake this work.

The consultation period for this project is being extended based on comments that have been received to date. As such, the LNA attached as Appendix B to this report is a draft for the purposes of additional community and developer consultation. Part of this consultation will include a series of further meetings with the Housing Supply Reference Group. The final LNA (Community Growth) is targeted to return to Council in fall 2024.

9.0 Other Related Initiatives

As identified in the recent "Targeted Actions" report to Strategic Priorities and Policy Committee on April 16, 2024, there are several planned or ongoing reviews related to land supply, policy, and process.

- The Growth Management Implementation Strategy (GMIS) annual update will report on growth funding requirements and timing.
- A GMIS process review will ensure continued alignment with the goals of the 47,000 housing target with an added focus on intensification.
- An Intensification Inventory is scheduled to identify redevelopment potential. ReThink Zoning has been re-prioritized to address regulations impeding housing supply target goals.
- Through the Housing Accelerator Fund Program several reviews have been scheduled for 2024: Heights Framework Review of The London Plan, a review of the Transit Village Place Type, and a review of as-of-right zoning within Protected Major Transit Station Areas.

10.0 Next Steps

The following is a summary of next steps that will be taken related to the Official Plan Review and Land Needs Assessment:

- Circulating the Council-adopted Phase 1A of the Official Plan Review for Ministry approval.
- Hold additional consultations on the draft Land Needs Assessment (Community Growth).
- Return to Council with a finalized LNA, as Phase 1B of the Section 26 Official Plan Review.
- Review the Urban Growth Boundary, including requested sites, against the evaluation criteria.
- Report on Land Needs for Employment land uses. The Industrial Land Needs

Assessment report, targeted for Q3 2024, is anticipated to include consideration related to Employment Lands definition change under the new draft Provincial Policy Statement, and identify the need for an Industrial Urban Growth Boundary review, as required.

- Initiate a subsequent phase of the Official Plan Review, anticipated to include conformity with provincial policies and legislation. The next phase is anticipated to take place following provincial approval of a new Provincial Planning Statement policy framework. If the matters to be considered through the Section 26 Official Plan Review change as a result of new provincial policies, then a special public meeting will be held before Council to discuss the scope of work relative to the Terms of Reference.
- The Intensification Target will continue to be monitored and future changes may be recommended based on the outcome of these policy reviews and servicing and infrastructure projects.

Conclusion

This report recommends adoption of Phase 1A of the Official Plan Review, including amended growth management policies, a 25-year planning horizon, and industrial land conversions to applicable land use designations. The report recommends additional consultation on the draft Land Needs Assessment (Community Growth), noting the draft has included the industrial conversions, 25-years planning horizon, and MOF Projections into the growth demands and land supply calculations.

Industrial land needs will be assessed in a separate report to Council, targeted for Q3 2024.

Land use permission, policy, and servicing reviews associated with the Housing Accelerator Fund (HAF) are being undertaken in parallel to the ongoing Official Plan Review. HAF projects anticipated to impact land supply include a review of the Transit Village Place Type and Heights Framework Review of The London Plan.

Prepared by: Brandon Coveney
Planner, Planning Policy (Growth Management)

Prepared by: Joanne Lee
Planner, Planning Policy (Growth Management)

Prepared by: Darcy Vander Pryt
Planner, Strategic Land Development

Reviewed by: Travis Macbeth, MCIP, RPP
Manager, Planning Policy (Growth Management)

Reviewed by: Justin Adema, MCIP, RPP
Manager, Long Range Planning

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

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

BC/JL/DVP/bc/jl/dvp

Cc Chris McIntosh, Acting Director Economic Services and Supports
Michael Tomazincic, Manager, Strategic Land Development

Appendix A – Phase 1A of Section 26 Official Plan Review

Bill No. (number to be inserted by Clerk's Office)
2023

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

A by-law to adopt phase 1A of the Official
Plan Review of The London Plan.

WHEREAS Section 26.(1.1) of the *Planning Act* requires the council of the municipality that has adopted an Official Plan to, not less frequently than ten years after the plan comes into effect, review and revise the Official Plan.

AND WHEREAS the Municipal Council held a special meeting, open to the public, on April 11, 2023 to determine the need to revise the Official Plan.

AND WHEREAS the Municipal Council confirmed the need for a revision and adopted terms of reference for the Official Plan review on April 25, 2023.

AND WHEREAS the Municipal Council held a public meeting on June 11, 2024 for public representations in respect of phase 1A of the Official Plan review.

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

1. That the Amendments to The London Plan constituting Phase 1A of the Official Plan Review of The London Plan under Section 26 of The *Planning Act*, as attached as Schedule "1" through Schedule "10" is hereby adopted.
2. That Clerk of the Municipality is authorized and directed to make application to the Minister of Municipal Affairs for approval of the aforesaid Phase 1A of the Official Plan Review of The London Plan, including amendments contained within Schedule "1" through Schedule "10" of Appendix A.

PASSED in Open Council on June 25, 2024

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – June 25, 2024
Second Reading – June 25, 2024
Third Reading – June 25, 2024

Schedule 1 to Appendix A – Planning Horizon Amendment

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 amend the current planning horizon of 20 years to 25 years throughout this Plan.

B. LOCATION

The amendment is a city-initiated text amendment which applies to all lands within the City of London.

C. BASIS OF THE AMENDMENT

The amendment would extend the planning horizon from 20 years to 25 years for The London Plan. The amendment includes associated housekeeping changes, including the current 20-year growth forecasts and references to 20 years and the year 2035. The amendment is consistent with the current 2020 Provincial Policy Statement.

D. THE AMENDMENT

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

1. The Our Challenge part of The London Plan for the City of London is amended by deleting the words “20 years” in the following policies and replacing them with “25 years”:
 - a. Policy 4
 - b. Policy 7
 - c. Policy 10
 - d. Policy 20
 - e. Policy 21
 - f. Policy 28
 - g. Policy 29
 - h. Policy 47_3
2. The Our Challenge part of The London Plan for the City of London is amended by deleting the word “2035” and replacing it with “2046” in the following policies:
 - a. Policy 10
 - b. Policy 16
 - c. Policy 24
 - d. Policy 27
 - e. Policy 29

3. The Our Challenge part of The London Plan for the City of London is amended by deleting policy 6 in its entirety and replacing it with the following:

239,000 NET NEW PEOPLE

London's population will increase substantially over the next 25 years. We forecast that our city's population will grow by over 239,000 people and our employment will grow by 134,000 net new jobs between 2022 and 2046. It is possible that growth could be higher if London is able to exceed our forecasts of net migration. Where will these people come from and what opportunities will they generate? How will these new jobs be created? With this growth, what kind of housing will we need to accommodate all Londoners?

4. The Our Challenge part of The London Plan for the City of London is amended by deleting policy 8 in its entirety and replacing it with the following:

As the "Baby Boom" generation enters into retirement, their collective impact will be pronounced. In 2001, 21% of the population, or almost 1-in-5 Londoners, were aged 55+. This percentage rose to 30% by 2022 and we forecast that 3-in-10 Londoners will be 55 years old or more by 2046. How can we build an age-friendly city that allows people of all ages and abilities to experience health, wellness and an exceptional quality of life?

5. The Our Challenge part of The London Plan for the City of London is amended by deleting policy 45 in its entirety and replacing it with the following:

The London Plan is a 25-year plan that sets out the vision, principles, priorities, strategies, policies and directions to the year 2046. It should be recognized that the Plan is not intended to necessarily reflect the use, intensity or form of development that currently exists today, but rather is intended to plan for what is envisioned over the next 25 years. The need to update the Plan will be reviewed within the first ten years and every five years thereafter to ensure that it is in keeping with changes in the social, economic and environmental context of the city.

6. The Our Challenge part of The London Plan for the City of London is amended by revising years and numbers on a diagram located after policy 10, as indicated on "Schedule 1" attached hereto.

7. The Our Challenge part of The London Plan for the City of London is amended by revising years and numbers on a diagram beside policy 16, as indicated on "Schedule 2" attached hereto.

8. The Our Strategy part of The London Plan for the City of London is amended by deleting the words "20 years" in the following policies and replacing them with "25 years":

- a. Policy 52_5

- b. Policy 54

9. The Our Strategy part of The London Plan for the City of London is amended by deleting the word "2035" in the following policies and replacing them with "2046":

- a. Policy 53, including the vision for the London of 2035

- b. Policy 54

10. The Our City part of The London Plan for the City of London is amended by deleting the words “20 years” in the following policies and replacing them with “25 years”:
 - a. Policy 65
 - b. Policy 66
 - c. Policy 69
 - d. Policy 71
 - e. Policy 73
 - f. Policy 74
 - g. Policy 126
 - h. Policy 134
 - i. Policy 144
11. The Our City part of The London Plan for the City of London is amended by deleting policy 64 in its entirety and replacing it with the following:

Our city is forecast to grow by approximately 239,000 people and 107,000 housing units over the life of this Plan. In addition, our commercial uses, offices, institutions, and industries will all grow over the next 25 years. Our economy will expand and the number of people employed in our city will increase significantly.
12. The Our City part of The London Plan for the City of London is amended by deleting policy 67 in its entirety and replacing it with the following:

Growth forecasts were prepared to the year 2046 – the 25-year planning horizon for *The London Plan*. These forecasts, shown in Tables 1 through 5, will be monitored, extended, and revised during any comprehensive review of this Plan.
13. The Our City part of The London Plan for the City of London is amended by deleting the word “2035” in policy 95 and replacing them with “2046”.
14. The City Building Policies part of The London Plan for the City of London is amended by deleting the words “20 years” in the following policies and replacing them with “25 years”:
 - a. Policy 184
 - b. Policy 185
 - c. Policy 192
 - d. Policy 406
15. The City Building Policies part of The London Plan for the City of London is amended by deleting the word “2035” in the following policies and replacing them with “2046”:
 - a. Policy 186
 - b. Policy 192
 - c. Policy 388

- d. Policy 494
 - e. Policy 525
 - f. Policy 526
 - g. Policy 652
16. The Place Types Policies part of The London Plan for the City of London is amended by deleting the word “2035” in policy 746 and replacing them with “2046”:
17. The Place Type Policies part of The London Plan for the City of London is amended by deleting the words “20 years” in the following policies and replacing them with “25 years:
- a. Policy 747
 - b. Policy 1105
 - c. Policy 1127
 - d. Policy 1174

18. The Place Types Policies part of The London Plan for the City of London is amended by deleting the words “of 2035” in policy 797.

19. The Place Types Policies part of The London Plan for the City of London is amended by deleting the first paragraph in policy 916 and replacing it with the following:

The Neighbourhoods Place Type will be vibrant, exciting places to live, that help us to connect with one another and give us a sense of community well-being and quality of life. Some of the key elements of our vision for the Neighbourhoods Place Type include:

20. The Place Types Policies part of The London Plan for the City of London is amended by deleting policy 1079 in its entirety and replacing it with the following:

Our educational, health care and research institutions play an enormous role in shaping our community and our economy. They offer services that Londoners value deeply, they attract talent and knowledge to our city and they contribute significantly to our economic prosperity. They also add tremendous social value to our city, helping those that need it the most. Our institutions will be burgeoning with knowledge, discovery, innovation, and services that benefit all Londoners. Our institutional centres will be well connected with the Downtown and the rest of London, making them easily accessible and integrated into the fabric of our community.

21. The Place Types Policies part of The London Plan for the City of London is amended by deleting the words “in 2035” in policy 1104.

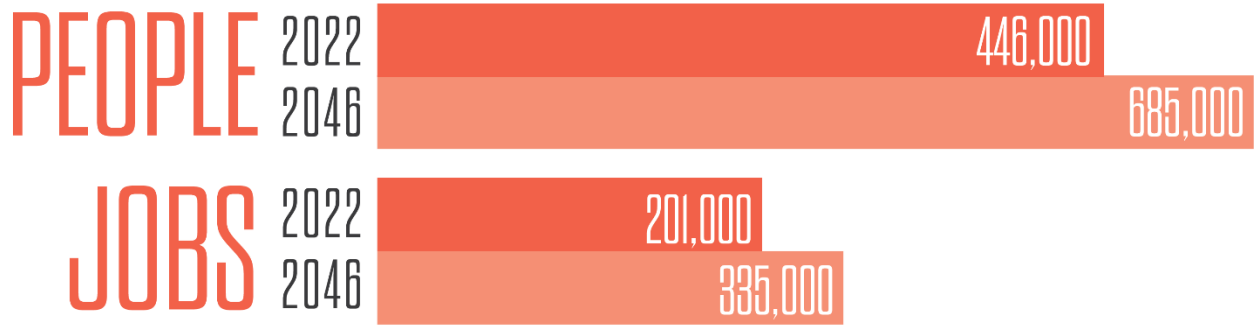
22. The Place Types Policies part of The London Plan for the City of London is amended by deleting policy 1106 in its entirety and replacing it with the following:

Our industrial sector will be burgeoning. Capitalizing on the quality of life in our city as one of our strongest marketing tools, we will be highly attractive to a youthful labour force and the best and the brightest that many companies are looking for. We will be strongly connected to the region and the world with our valuable Highway 401 and 402 corridors which we will use to brand and market to millions of potential investors that pass

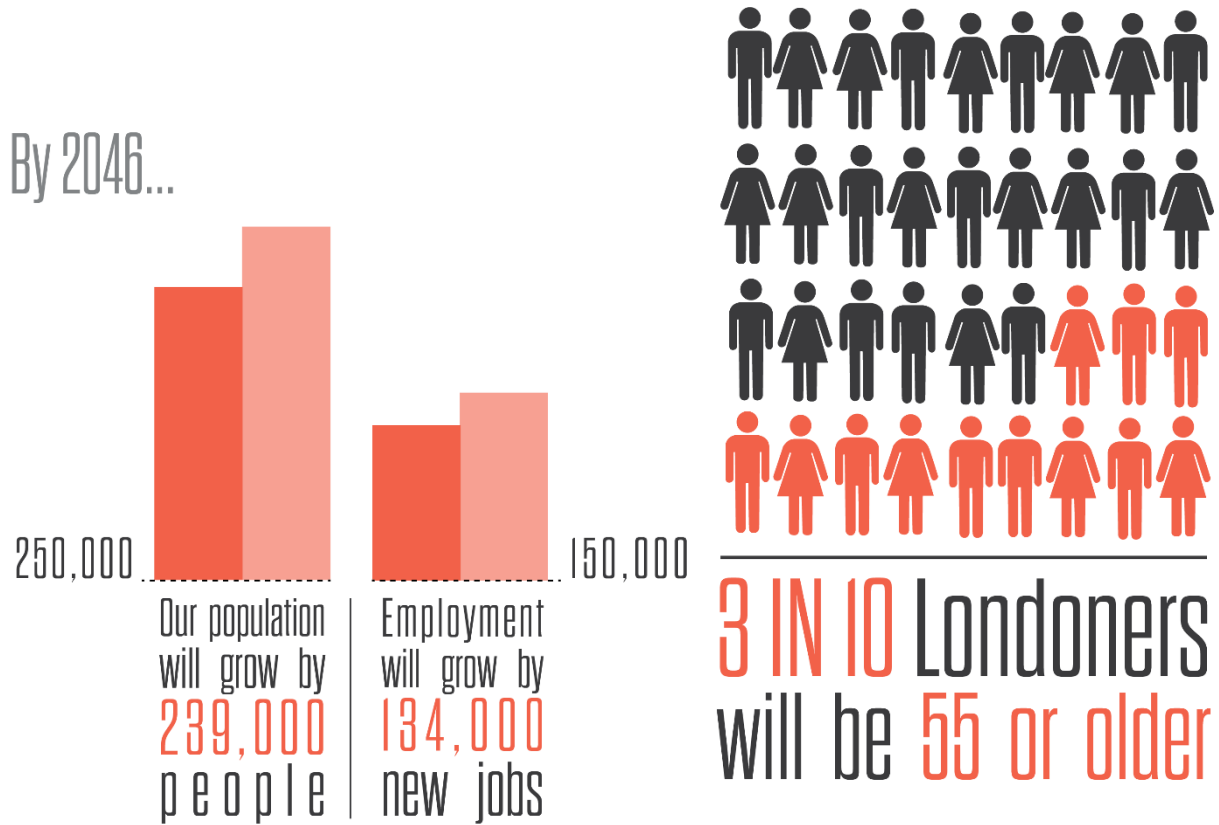
along our part of the NAFTA Superhighway each day. The technology stemming from our hospitals, university, and colleges will shine through to those looking for innovation and excellence and we'll need to make attractive provision for these forms of development within our industrial land offering. We will blend the industrial sectors that have been pillars of growth in London for decades with new sectors that will provide abundant opportunities for economic activity.

23. The Our Tools part of The London Plan for the City of London is amended by deleting by deleting the word "2035" in policy 1566 and replacing it with "2046".

“Schedule 1”



“Schedule 2”



Schedule 2 to Appendix A – Greenfield Density Target Amendment

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

E. PURPOSE OF THIS AMENDMENT

The purpose of this Amendment is to add a greenfield target of 50 residents and jobs per gross hectare to support the vision of The London Plan.

F. LOCATION OF THIS AMENDMENT

This Amendment is a city-initiated text amendment which applies to all lands within the City of London.

G. BASIS OF THE AMENDMENT

The amendment would supports building a mixed-use compact city, by encouraging a mix of housing types and planning to achieve a compact, contiguous pattern of growth.

H. THE AMENDMENT

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

1. The Our City part of The London Plan for the City of London is amended by adding a new policy as follows:

78A_ It is a target of this Plan that the Greenfield lands located within the Urban Growth Boundary will achieve a minimum density of 50 residents and jobs per gross hectare.

Schedule 3 to Appendix A – Industrial Land Conversion

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 change the designation of the subject lands identified in Map 1 – Place Types – of the City of London FROM Light Industrial Place Type TO Neighbourhoods Place Type.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to lands located at 2496 Dundas Street in the City of London.

C. BASIS OF THE AMENDMENT

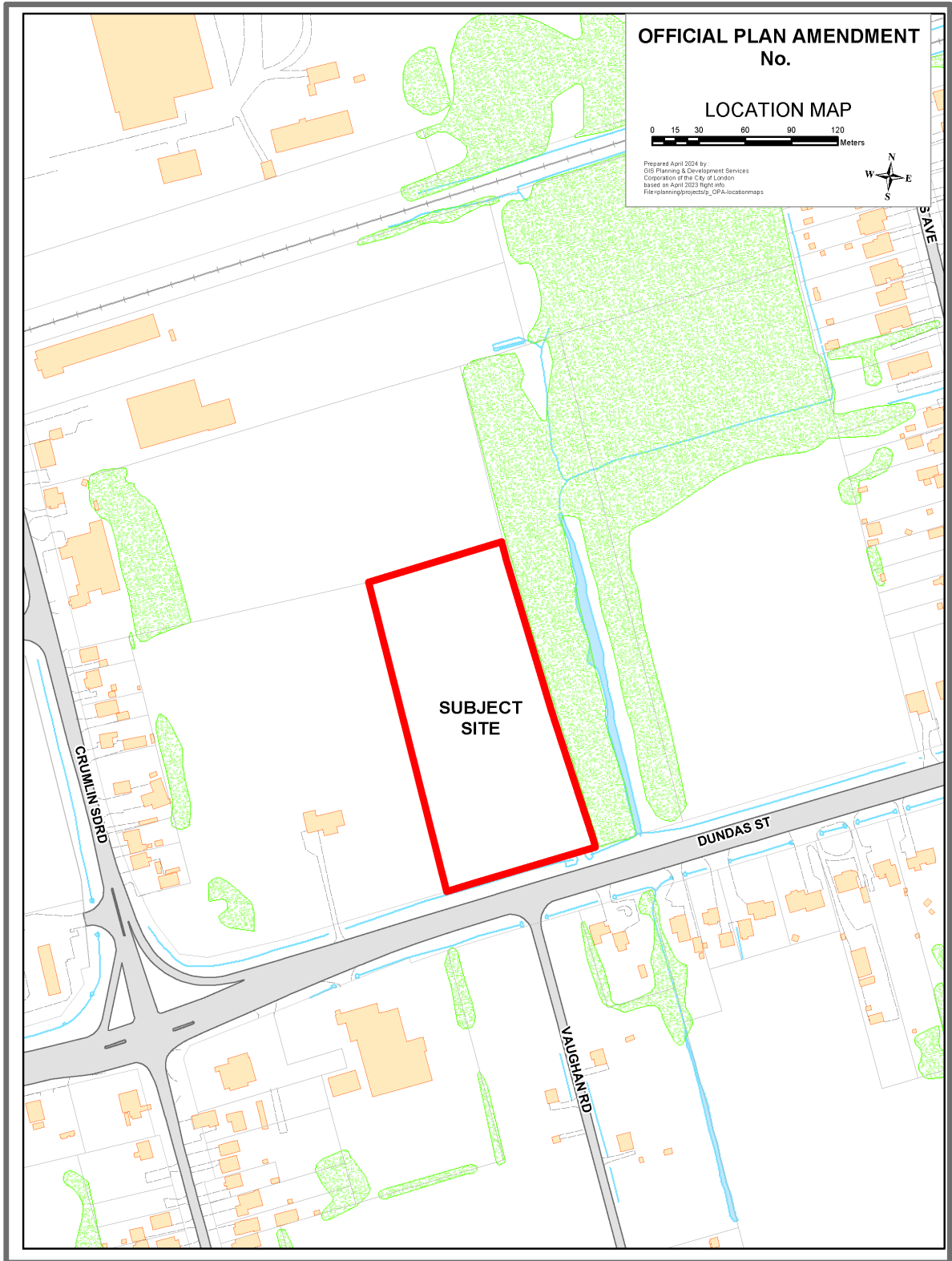
Based on an Official Plan Review and Land Needs Assessment the amendment would convert the subject lands from an industrial land use to a non-industrial land use. The proposed industrial land conversions are based on an evaluation of criteria that includes, but is not limited to, compatibility of proposed land use, economic development initiatives and strategic locations, feasibility of municipal servicing, environmental or other constraints, and adequate parcel size as well as market demands from target industrial sectors.

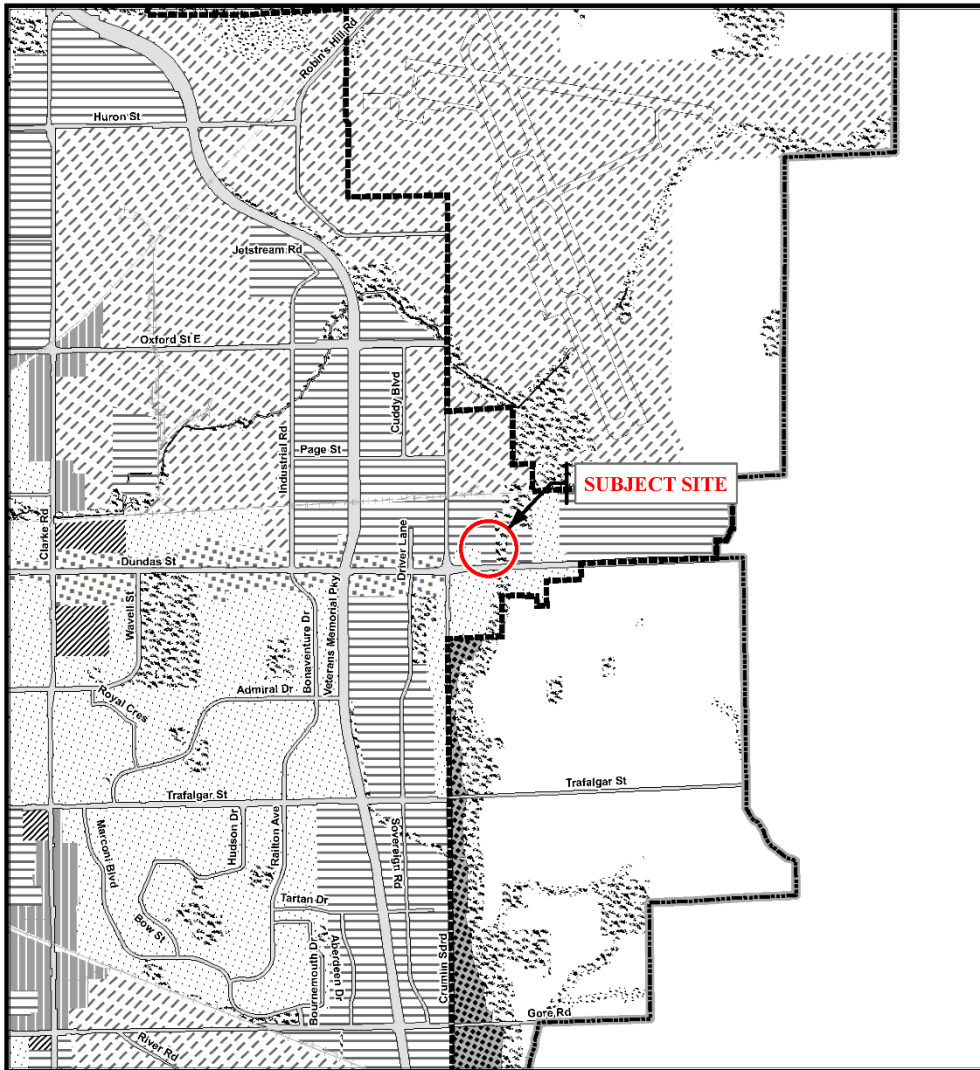
D. THE AMENDMENT

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

- i. Map 1 – Place Types, to the Official Plan, The London Plan, for the City of London Planning Area is amended by changing the designation of the identified subject lands from Light Industrial Place Type to Neighbourhoods Place Type, as indicated on “Schedule 1” attached hereto.

“Schedule 1”





Legend

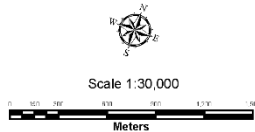
- | | | |
|------------------------|--------------------------|---|
| Downtown | Future Community Growth | Environmental Review |
| Transit Village | Heavy Industrial | Farmland |
| Shopping Area | Light Industrial | Rural Neighbourhood |
| Rapid Transit Corridor | Future Industrial Growth | Waste Management 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.

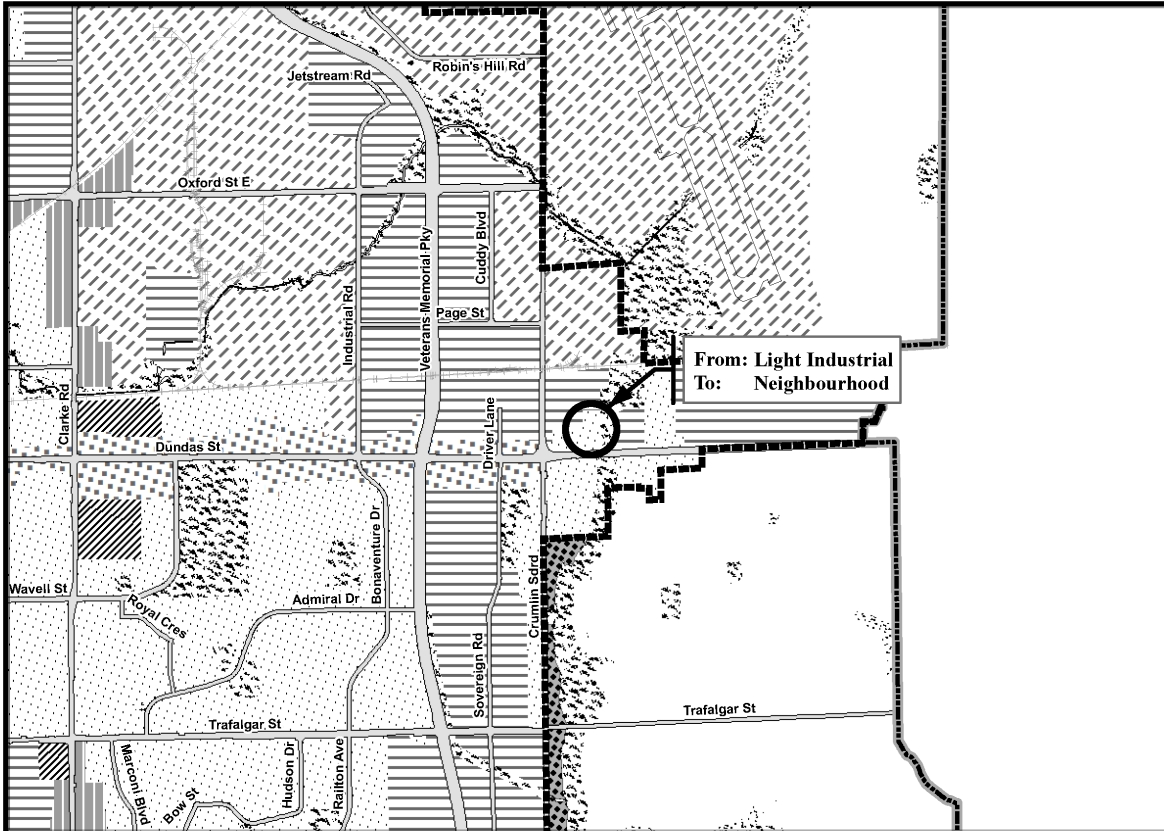
**CITY OF LONDON
Official Plan**

**LONDON PLAN MAP 1
- PLACE TYPES -**

PREPARED BY: Planning & Development



File Number: O-9595
Planner: BC
Technician: RC
Date: 2024/04/25



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 # TO OFFICIAL AMENDMENT NO. _____</p> <p><small>PREPARED BY: Planning & Development</small></p>	<p>Scale 1:30,000</p> <p>Meters</p>	<p>FILE NUMBER: O-9595</p> <p>PLANNER: BC</p> <p>TECHNICIAN: RC</p> <p>DATE: 4/25/2024</p>
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Schedule 4 to Appendix A – Industrial Land Conversion

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 change the designation of the subject lands identified in Map 1 – Place Types – of the City of London FROM Light Industrial Place Type TO Neighbourhoods Place Type.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to all lands located at 2251, 2253, and 2257 Trafalgar Street in the City of London.

C. BASIS OF THE AMENDMENT

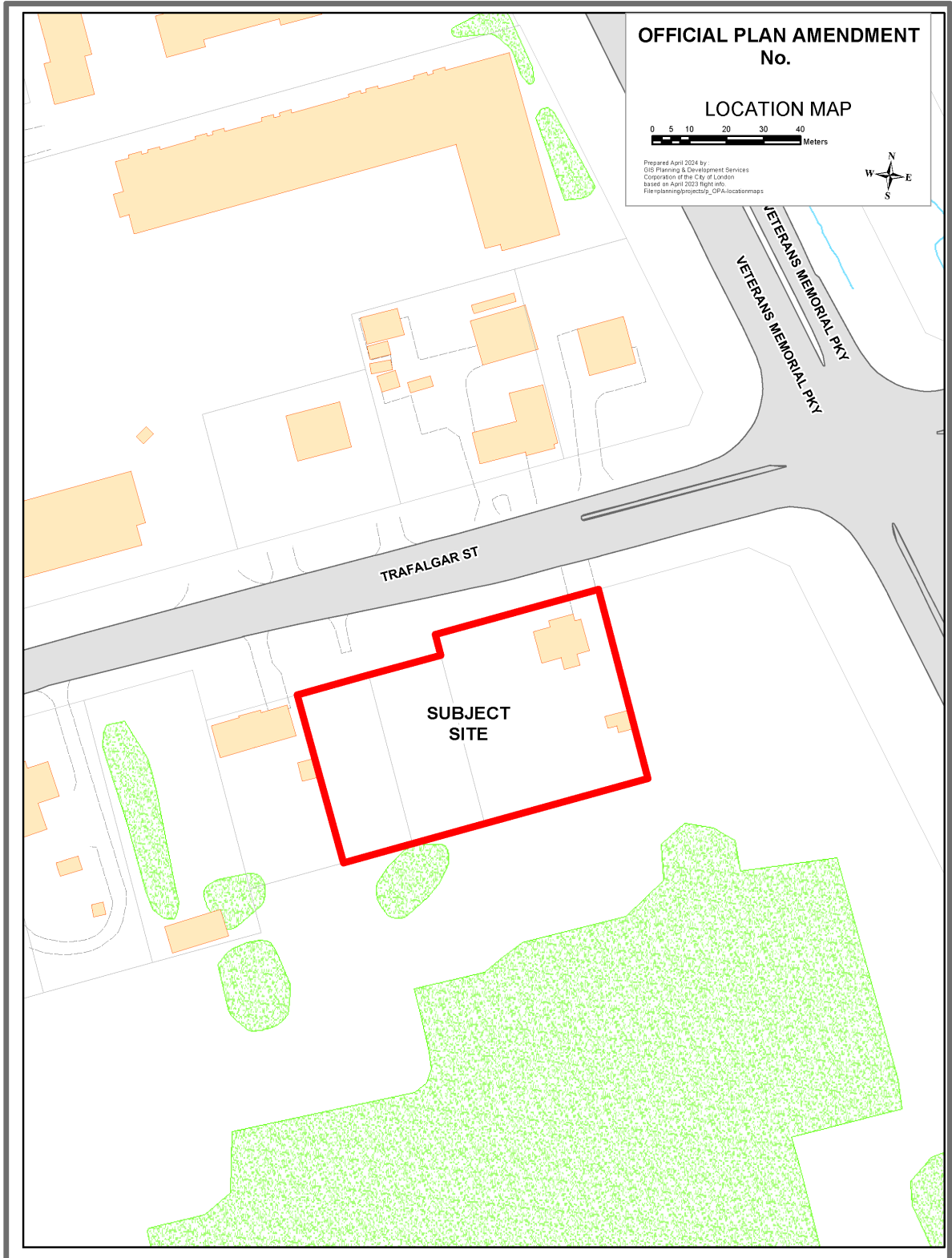
Based on an Official Plan Review and Land Needs Assessment the amendment would convert the subject lands from an industrial land use to a non-industrial land use. The proposed industrial land conversions are based on an evaluation of criteria that includes, but is not limited to, compatibility of proposed land use, economic development initiatives and strategic locations, feasibility of municipal servicing, environmental or other constraints, and adequate parcel size as well as market demands from target industrial sectors.

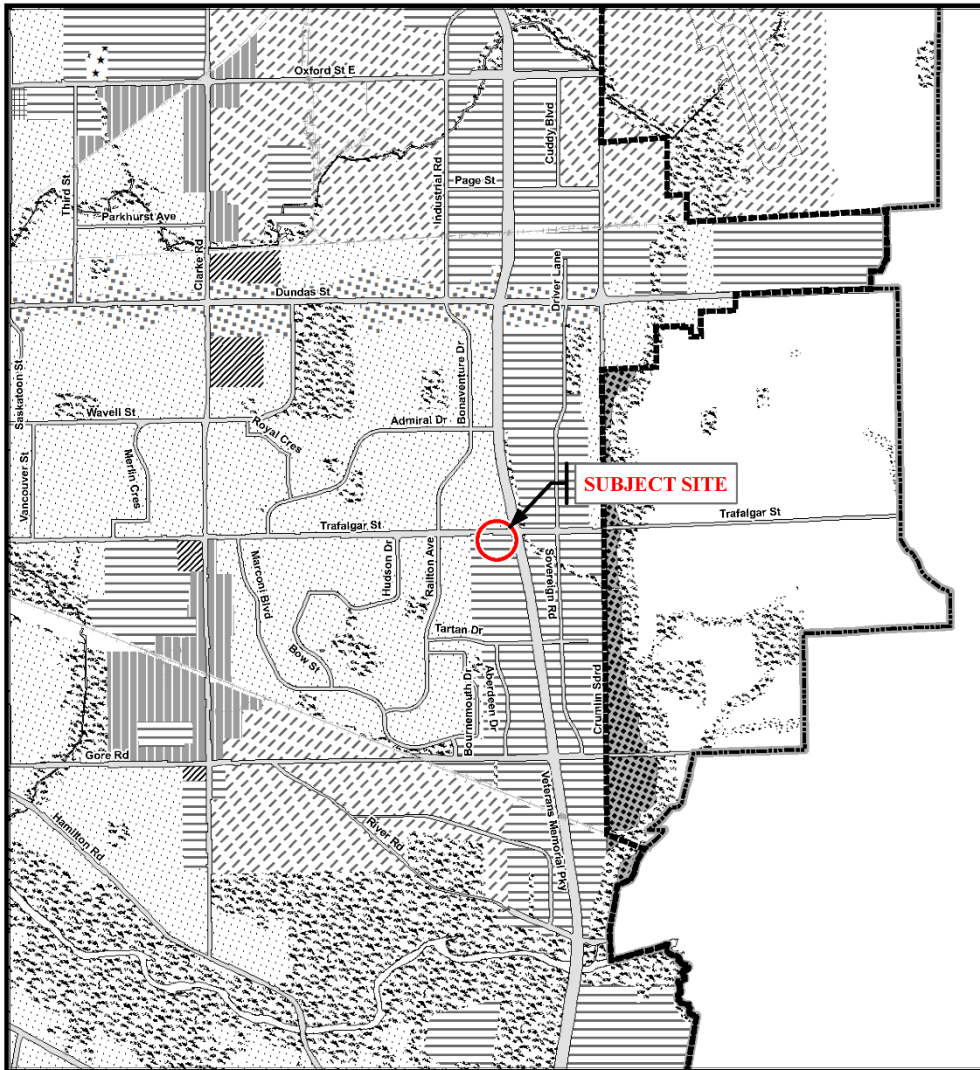
D. THE AMENDMENT

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

- i. Map 1 – Place Types, to the Official Plan, The London Plan, for the City of London Planning Area is amended by changing the designation of the identified subject lands from Light Industrial Place Type to Neighbourhoods Place Type, as indicated on “Schedule 1” attached hereto.

“Schedule 1”





Legend

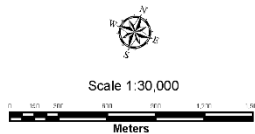
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|------------------------|--------------------------|---|
| Downtown | Future Community Growth | Environmental Review |
| Transit Village | Heavy Industrial | Farmland |
| Shopping Area | Light Industrial | Rural Neighbourhood |
| Rapid Transit Corridor | 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**

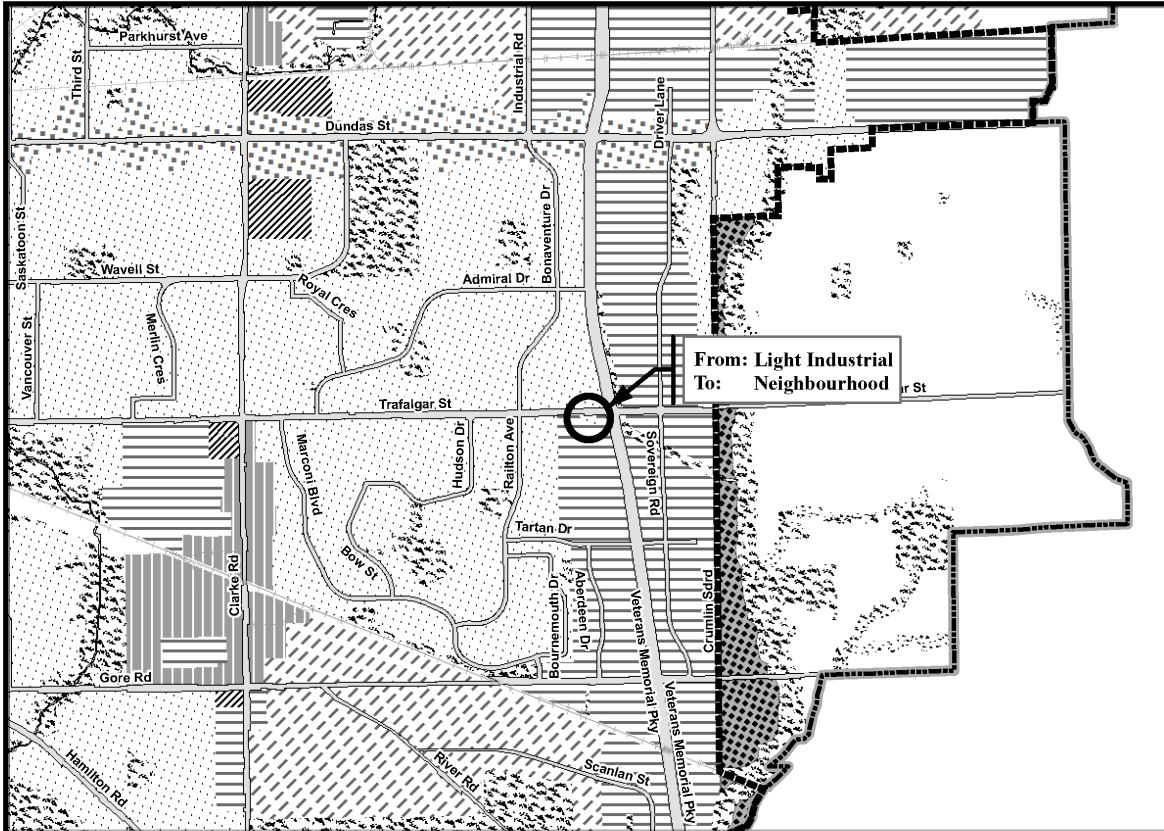
**LONDON PLAN MAP 1
- PLACE TYPES -**

PREPARED BY: Planning & Development



File Number: O-9595
Planner: BC
Technician: RC
Date: 2024/04/25

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 # TO OFFICIAL AMENDMENT NO. _____</p> <p><small>PREPARED BY: Planning & Development</small></p>	<p>Scale 1:30,000</p> <p>Meters</p>	<p>FILE NUMBER: O-9595</p> <p>PLANNER: BC</p> <p>TECHNICIAN: RC</p> <p>DATE: 4/25/2024</p>
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Schedule 5 to Appendix A – Industrial Land Conversion

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 change the designation of the subject lands identified in Map 1 – Place Types – of the City of London FROM Light Industrial Place Type TO Neighbourhoods Place Type.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to all lands located at 311 – 335 Eleanor Street, 1178 – 1182 York Street, and 1181 King Street in the City of London.

C. BASIS OF THE AMENDMENT

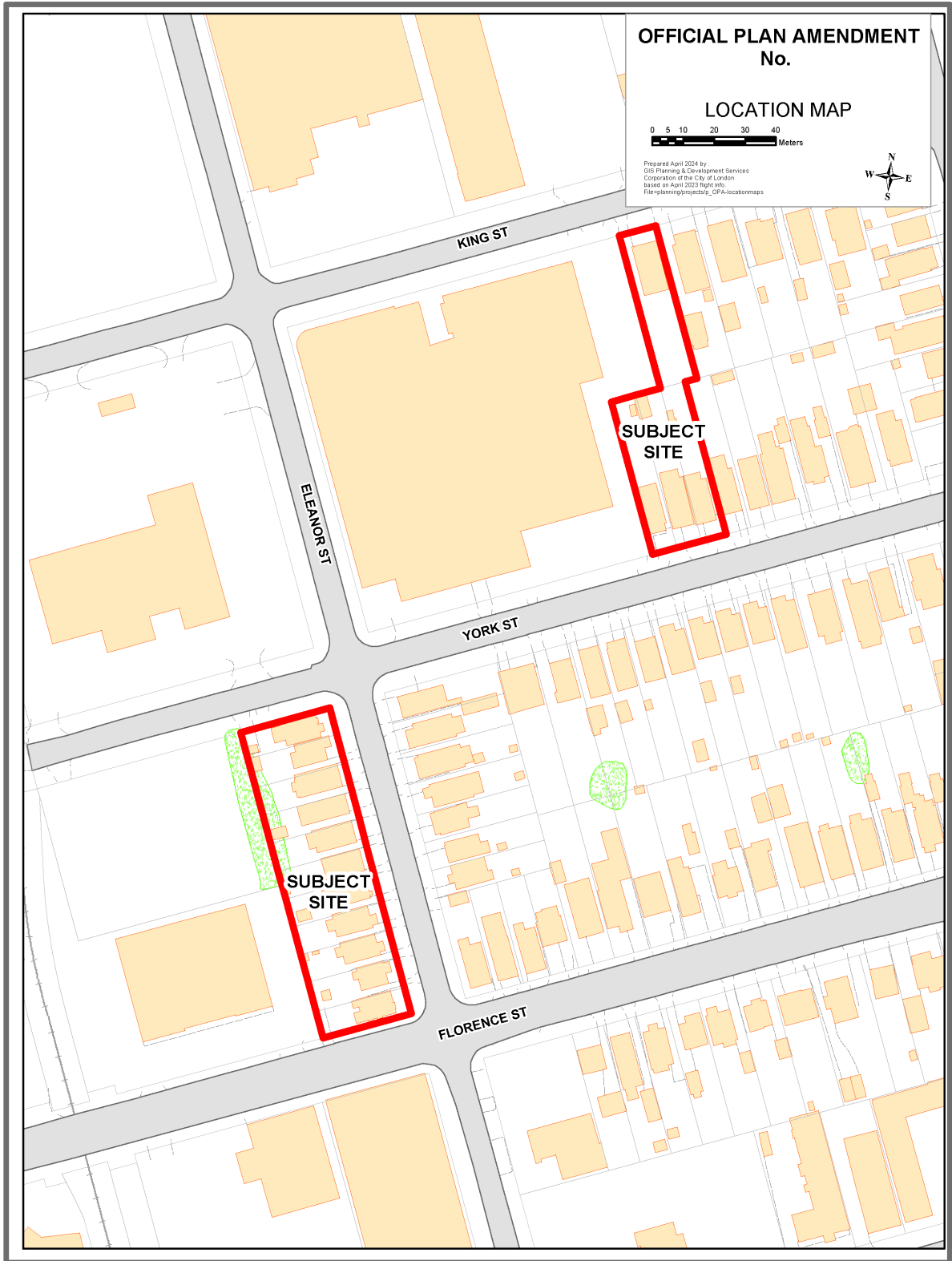
Based on an Official Plan Review and Land Needs Assessment the amendment would convert the subject lands from an industrial land use to a non-industrial land use. The proposed industrial land conversions are based on an evaluation of criteria that includes, but is not limited to, compatibility of proposed land use, economic development initiatives and strategic locations, feasibility of municipal servicing, environmental or other constraints, and adequate parcel size as well as market demands from target industrial sectors.

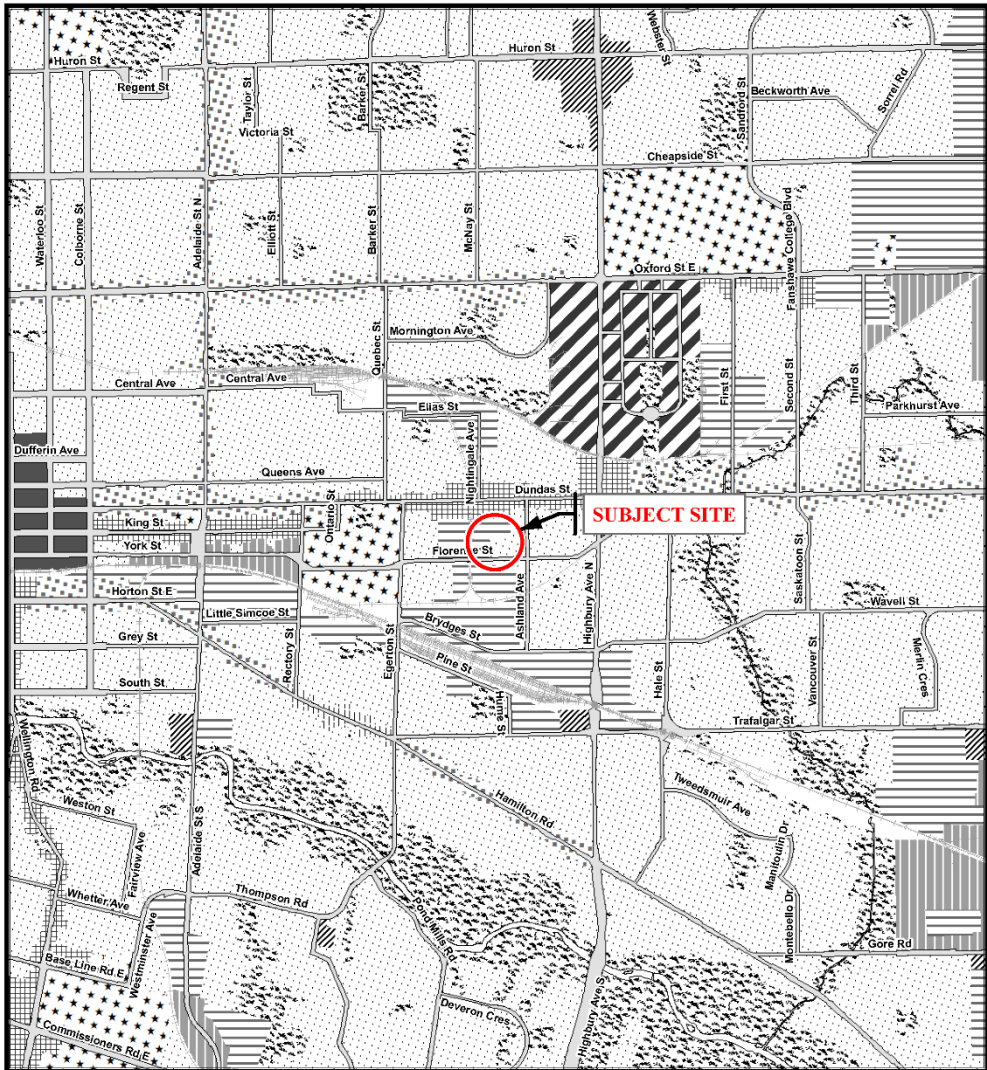
D. THE AMENDMENT

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

- i. Map 1 – Place Types, to the Official Plan, The London Plan, for the City of London Planning Area is amended by changing the designation of the identified subject lands from Light Industrial Place Type to Neighbourhoods Place Type, as indicated on “Schedule 1” attached hereto.

“Schedule 1”





SUBJECT SITE

Legend

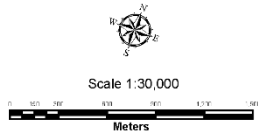
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|------------------------|--------------------------|---|
| Downtown | Future Community Growth | Environmental Review |
| Transit Village | Heavy Industrial | Farmland |
| Shopping Area | Light Industrial | Rural Neighbourhood |
| Rapid Transit Corridor | 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.

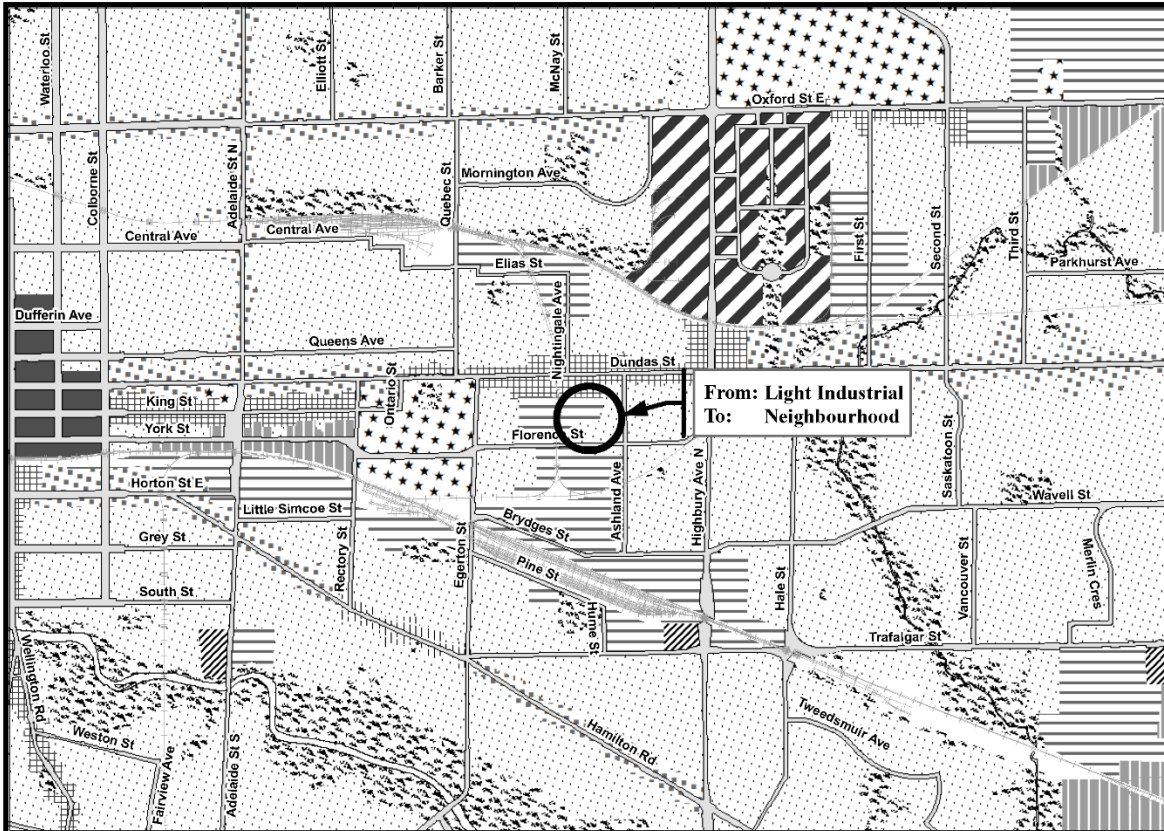
**CITY OF LONDON
Official Plan**

**LONDON PLAN MAP 1
- PLACE TYPES -**

PREPARED BY: Planning & Development



File Number: O-9595
Planner: BC
Technician: RC
Date: 2024/04/25



Legend

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|--|------------------------|--|--------------------------|--|---|
| | 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 align="center">SCHEDULE # TO OFFICIAL AMENDMENT NO. _____</p> <p align="center">PREPARED BY: Planning & Development</p>	<p align="center"> Scale 1:30,000 Meters </p>	<p>FILE NUMBER: O-9595</p> <p>PLANNER: BC</p> <p>TECHNICIAN: RC</p> <p>DATE: 4/25/2024</p>
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Schedule 6 to Appendix A – Industrial Land Conversion

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 change the designation of the subject lands identified in Map 1 – Place Types – of the City of London FROM Light Industrial Place Type TO Transit Village Place Type, and change the designation of the subject lands identified in Map 1 – Place Types – of the City of London FROM Rapid Transit Corridor Place Type TO Transit Village Place Type.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to all lands located at 100 Kellogg Lane, 1097 – 1181 Dundas Street, 1110 Florence Street, 1151 York Street, 1170 York Street, 351 Eleanor Street, 1101 King Street, and 1157 – 1165 King Street in the City of London.

C. BASIS OF THE AMENDMENT

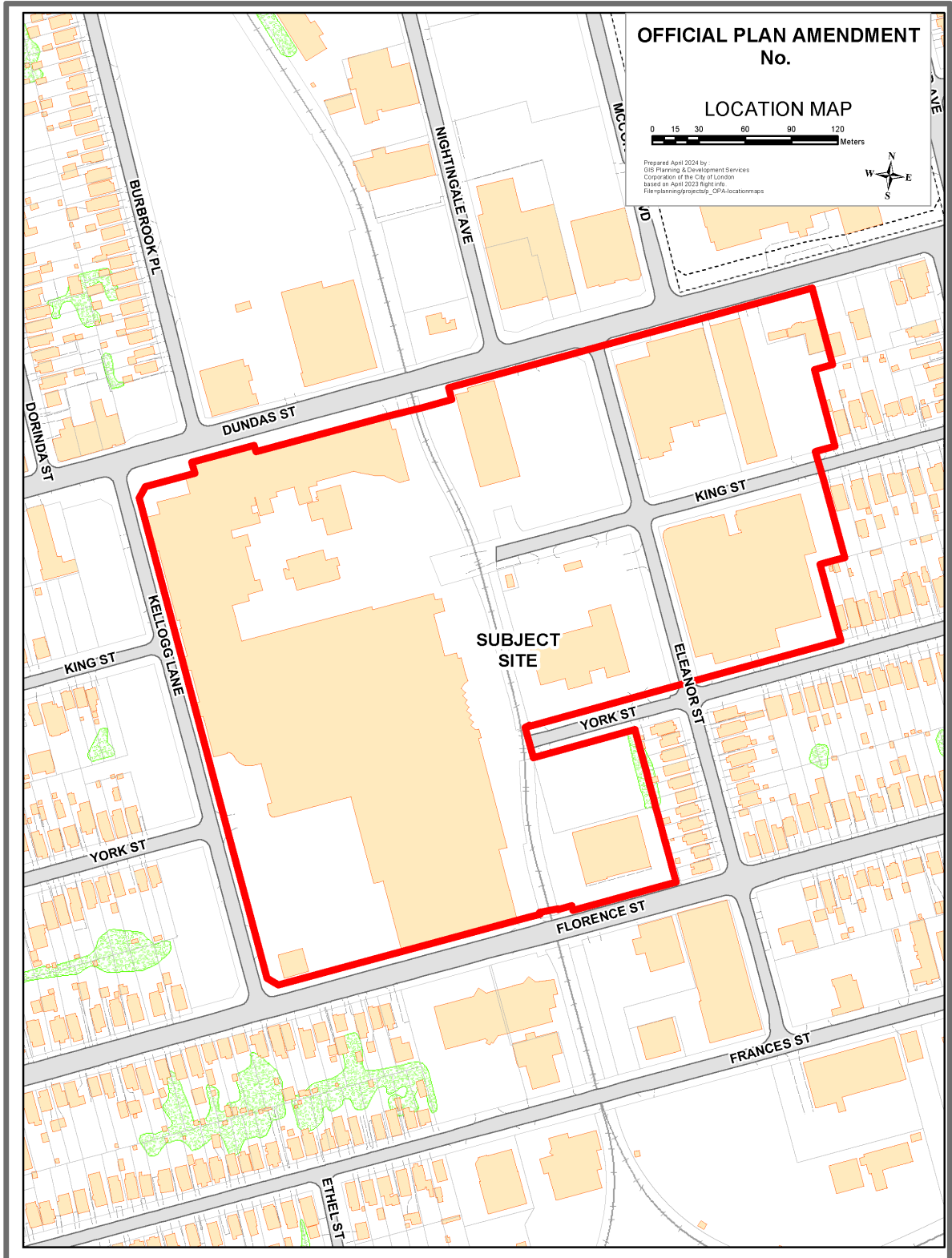
Based on an Official Plan Review and Land Needs Assessment the amendment would convert the subject lands from an industrial land use to a non-industrial land use. The proposed industrial land conversions are based on an evaluation of criteria that includes, but is not limited to, compatibility of proposed land use, economic development initiatives and strategic locations, feasibility of municipal servicing, environmental or other constraints, and adequate parcel size as well as market demands from target industrial sectors.

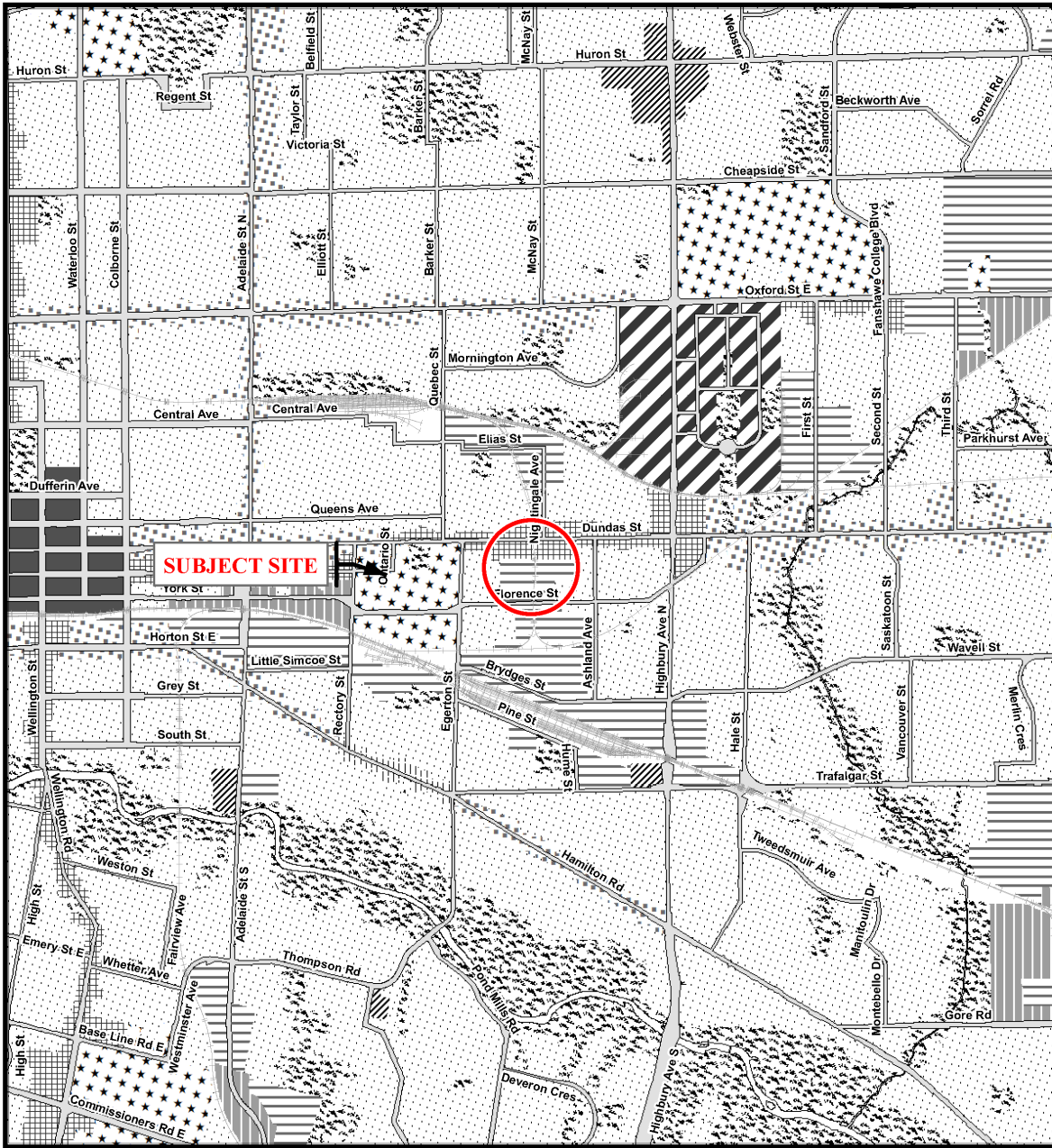
D. THE AMENDMENT

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

- i. Map 1 – Place Types, to the Official Plan, The London Plan, for the City of London Planning Area is amended by changing the designation of the identified subject lands from Light Industrial Place Type to Transit Village Place Type and by changing the designation of the identified subject lands from Rapid Transit Corridor Place Type to Transit Village Place Type, as indicated on “Schedule 1” attached hereto.

“Schedule 1”





Legend

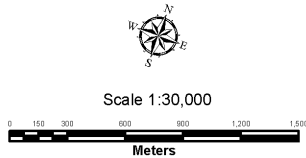
- | | | |
|------------------------|--------------------------|---|
| Downtown | Future Community Growth | Environmental Review |
| Transit Village | Heavy Industrial | Farmland |
| Shopping Area | Light Industrial | Rural Neighbourhood |
| Rapid Transit Corridor | Future Industrial Growth | Waste Management 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.

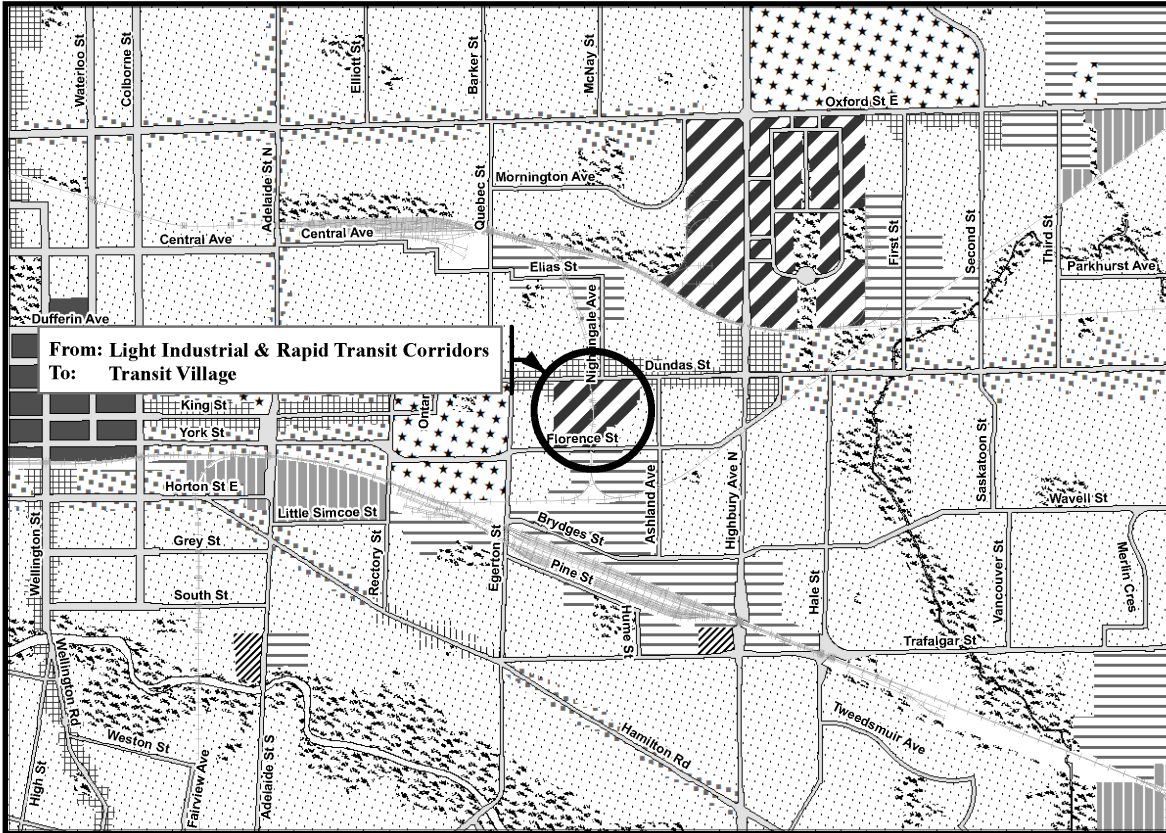
**CITY OF LONDON
Official Plan**

**LONDON PLAN MAP 1
- PLACE TYPES -**

PREPARED BY: Planning & Development



File Number: O-9595
Planner: BC
Technician: RC
Date: 2024/04/25



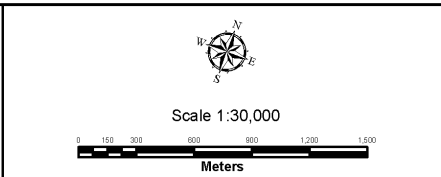
Legend

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.

SCHEDULE #
TO
OFFICIAL AMENDMENT NO. _____

PREPARED BY: Planning & Development



FILE NUMBER: O-9595
PLANNER: BC
TECHNICIAN: RC
DATE: 5/28/2024

Schedule 7 to Appendix A – Industrial Land Conversion

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 change the designation of the subject lands identified in Map 1 – Place Types – of the City of London FROM Commercial Industrial Place Type TO Neighbourhoods Place Type, and add Specific Policies for the Neighbourhoods Place Type of Official Plan, The London Plan, for the City of London.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to all lands located at 1640 Fanshawe Park Road West, 1510 – 1568 Woodcock Street, 1605 Woodcock Place, 1790 – 1848 Blue Heron Drive, and lands legally described as LONDON CON 4 PT LOT 25 RP 33R4235 PT PART 1 RP 33R14936 PT PART 1.

C. BASIS OF THE AMENDMENT

Based on an Official Plan Review and Land Needs Assessment the amendment would convert the subject lands from an industrial land use to a non-industrial land use. The proposed industrial land conversions are based on an evaluation of criteria that includes, but is not limited to, compatibility of proposed land use, economic development initiatives and strategic locations, feasibility of municipal servicing, environmental or other constraints, and adequate parcel size as well as market demands from target industrial sectors. Addition of specific policies for the Neighbourhoods Place Type will permit the continued operation of compatible commercial industrial land uses following redesignation.

D. THE AMENDMENT

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

- i. Map 1 – Place Types, to the Official Plan, The London Plan, for the City of London Planning Area is amended by changing the designation of the identified subject lands from Commercial Industrial Place Type to Neighbourhoods Place Type, as indicated on “Schedule 1” attached hereto.
- ii. Specific Policies for the Neighbourhoods Place Type of Official Plan, The London Plan, for the City of London is amended by adding the following:

() 1510 Woodcock Street

In the Neighbourhoods Place Type located at 1510 Woodcock Street, the following uses may be permitted in the existing building in addition to the use permitted in the Place Type:

1. commercial recreation establishments;
2. commercial schools;
3. electrical and electronic products industries;
4. office, store and business electronic products industries;
5. support office uses up to a maximum gross floor area of 5000m².

() 1568 Woodcock Street

In the Neighbourhoods Place Type located at 1568 Woodcock Street, a service trade, business service establishment, warehouse establishment, or manufacturing and assembly industry use in the existing building may be permitted in addition to the use permitted in the Place Type.

() 1828 Blue Heron Drive

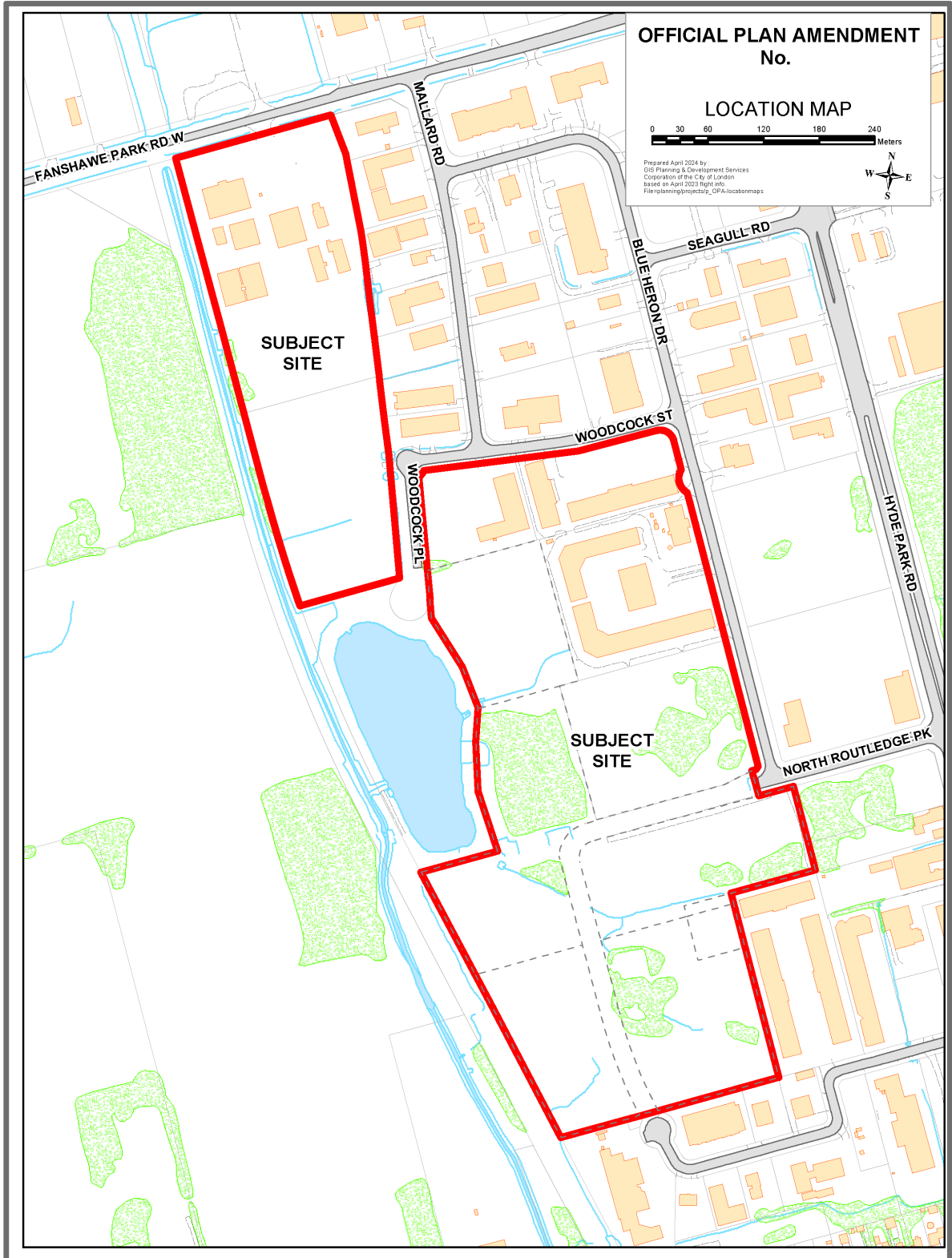
In the Neighbourhoods Place Type located at 1828 Blue Heron Drive, the following uses may be permitted in the existing building in addition to the use permitted in the Place Type:

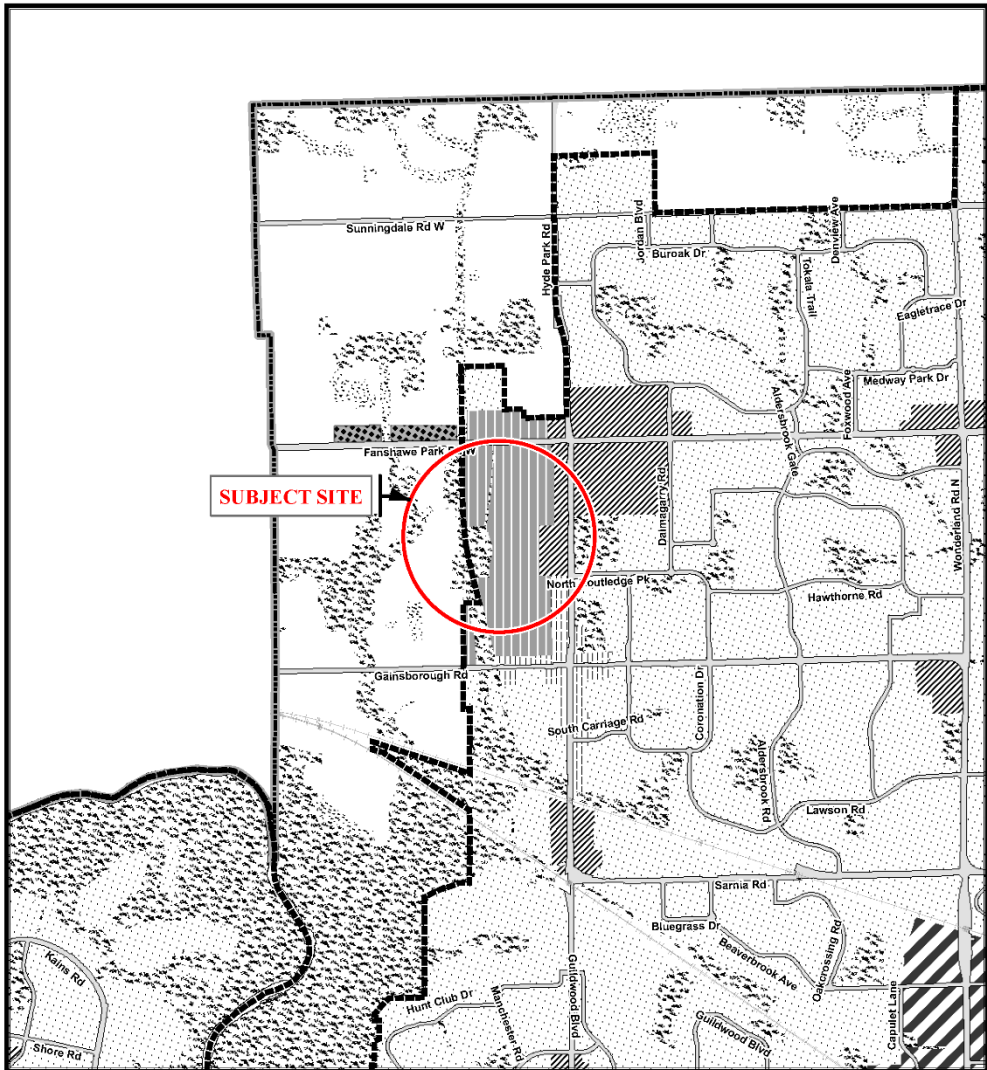
1. business service establishment;
2. clinics;
3. commercial recreation establishments;
4. commercial schools;
5. electrical and electronic products industries;
6. medical/dental offices up to a maximum gross floor area of 150m²;
7. laboratories;
8. office, store and business electronic products industries;
9. pharmaceutical and medical product industries;
10. support and professional office uses up to a maximum gross floor area of 5000m²;
11. wellness centre;
12. wholesale establishment.

() 1848 Blue Heron Drive

In the Neighbourhoods Place Type located at 1848 Blue Heron Drive, a daycare centre may be permitted in the existing building in addition to the use permitted in the Place Type.

“Schedule 1”





Legend

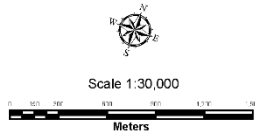
- | | | |
|------------------------|--------------------------|---|
| Downtown | Future Community Growth | Environmental Review |
| Transit Village | Heavy Industrial | Farmland |
| Shopping Area | Light Industrial | Rural Neighbourhood |
| Rapid Transit Corridor | Future Industrial Growth | Waste Management 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

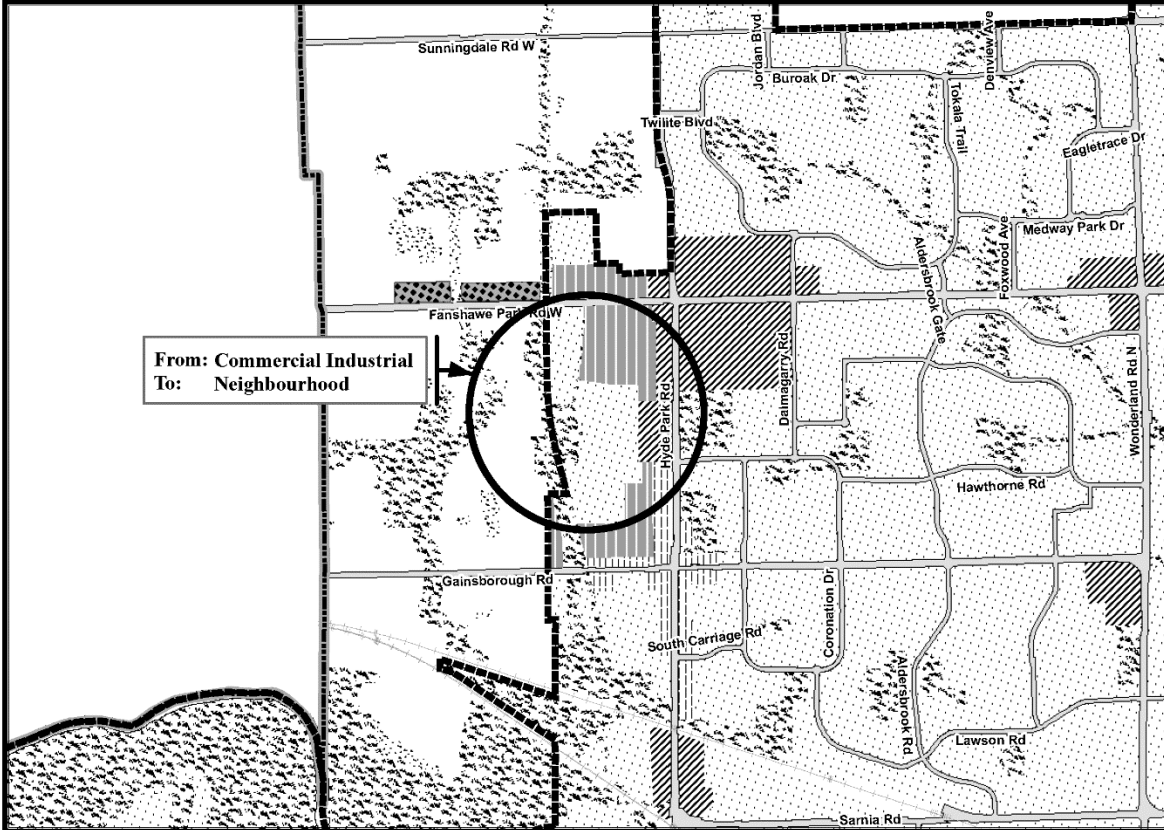


File Number: O-9595

Planner: BC

Technician: RC

Date: 2024/04/25



From: Commercial Industrial
To: Neighbourhood

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 # TO OFFICIAL AMENDMENT NO. _____</p> <p>PREPARED BY: Planning & Development</p>	<p>Scale 1:30,000</p> <p>Meters</p>	<p>FILE NUMBER: O-9595</p> <p>PLANNER: BC</p> <p>TECHNICIAN: RC</p> <p>DATE: 4/25/2024</p>
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Schedule 8 to Appendix A – Industrial Land Conversion

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 change the designation of the subject lands identified in Map 1 – Place Types – of the City of London FROM Commercial Industrial Place Type TO Neighbourhoods Place Type.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to lands located at 1525, 1557, 1579, and 1635 Fanshawe Park Road West in the City of London.

C. BASIS OF THE AMENDMENT

Based on an Official Plan Review and Land Needs Assessment the amendment would convert the subject lands from an industrial land use to a non-industrial land use. The proposed industrial land conversions are based on an evaluation of criteria that includes, but is not limited to, compatibility of proposed land use, economic development initiatives and strategic locations, feasibility of municipal servicing, environmental or other constraints, and adequate parcel size as well as market demands from target industrial sectors.

D. THE AMENDMENT

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

- i. Map 1 – Place Types, to the Official Plan, The London Plan, for the City of London Planning Area is amended by changing the designation of the identified subject lands from Commercial Industrial Place Type to Neighbourhoods Place Type, as indicated on “Schedule 1” attached hereto.
- ii. Specific Policies for the Neighbourhoods Place Type of Official Plan, The London Plan, for the City of London is amended by adding the following:

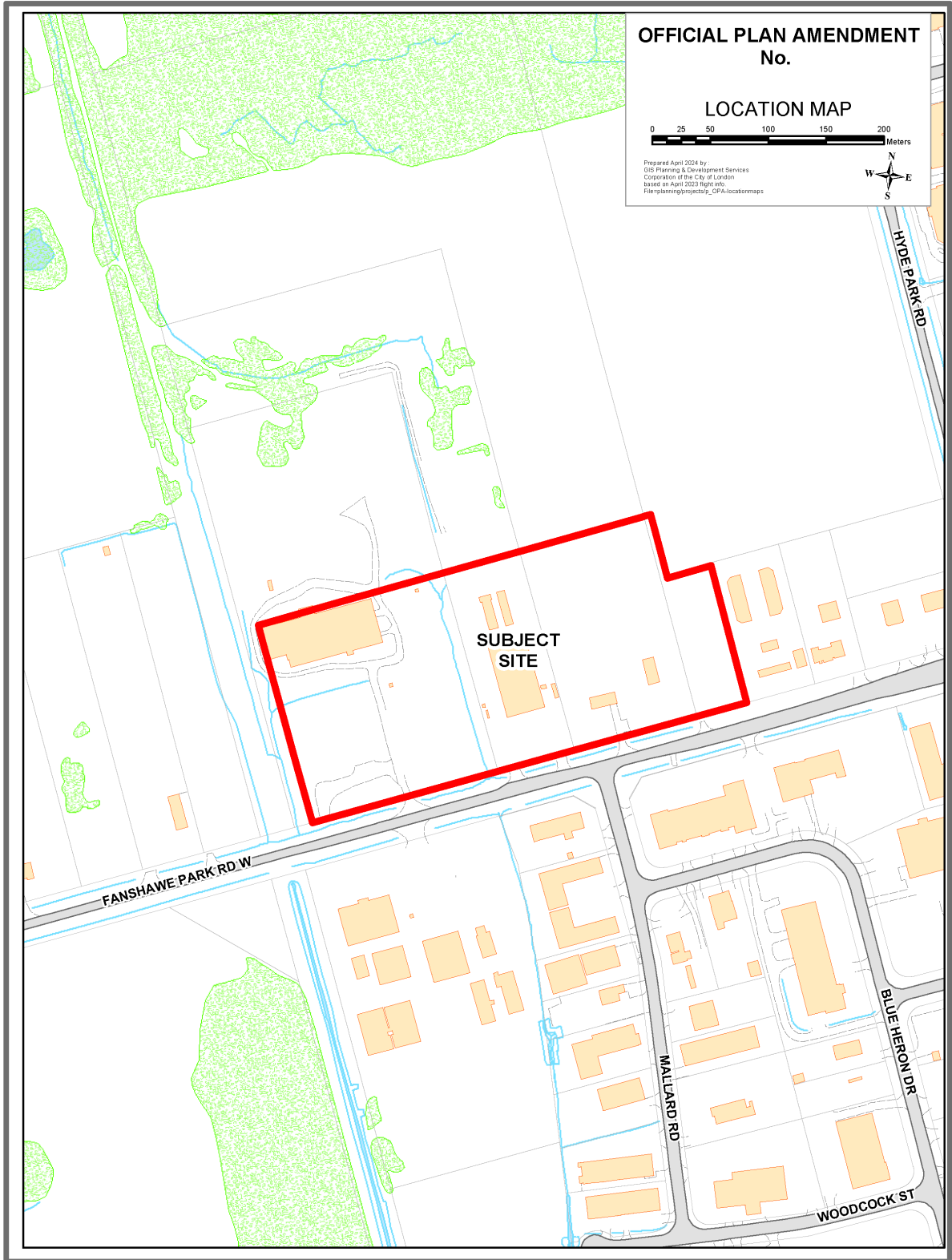
() 1635 Fanshawe Park Road West

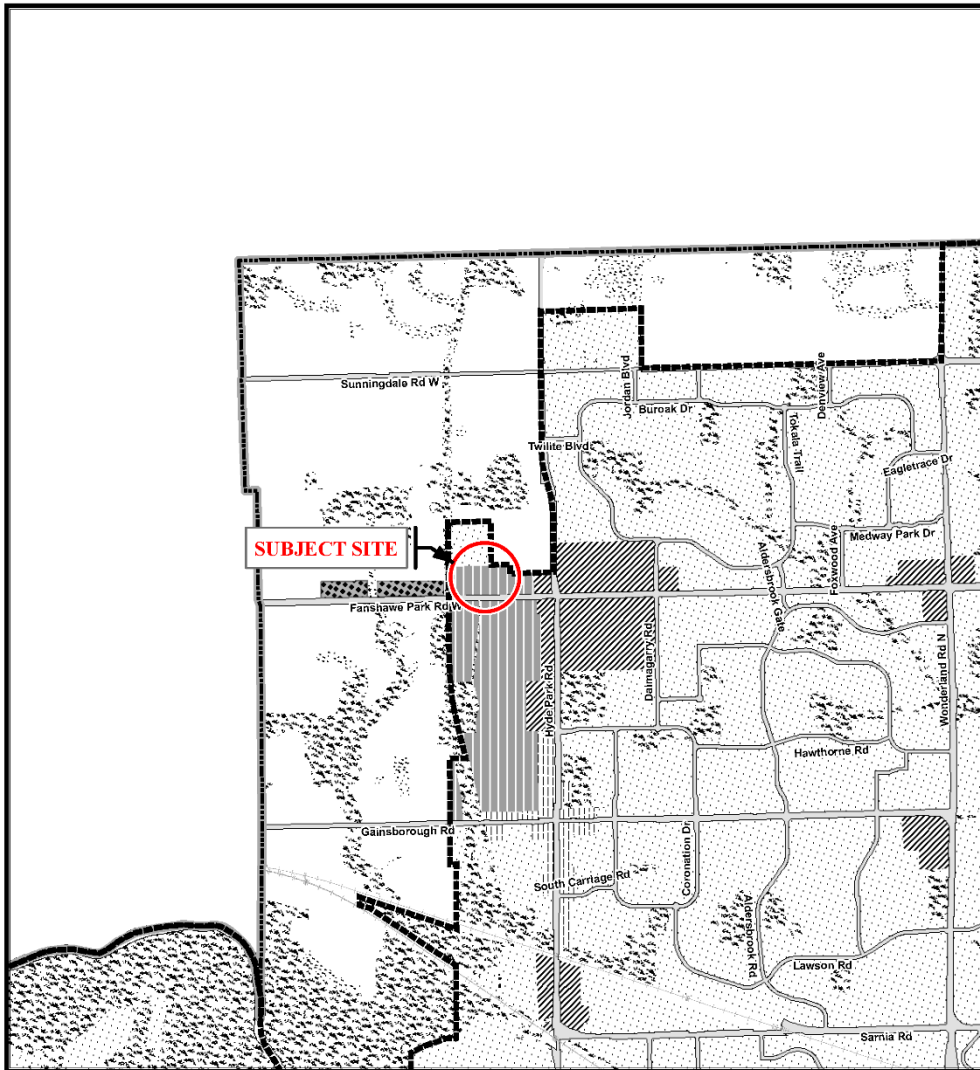
In the Neighbourhoods Place Type located at 1635 Fanshawe Park Road West, a home improvement store and bulk sales establishment may be permitted in addition to the use permitted in the Place Type.

() 1579 Fanshawe Park Road West

In the Neighbourhoods Place Type located at 1579 Fanshawe Park Road West, a repair and rental establishment may be permitted in addition to the use permitted in the Place Type.

“Schedule 1”





Legend

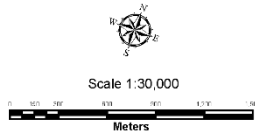
- | | | |
|------------------------|--------------------------|---|
| Downtown | Future Community Growth | Environmental Review |
| Transit Village | Heavy Industrial | Farmland |
| Shopping Area | Light Industrial | Rural Neighbourhood |
| Rapid Transit Corridor | Future Industrial Growth | Waste Management 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.

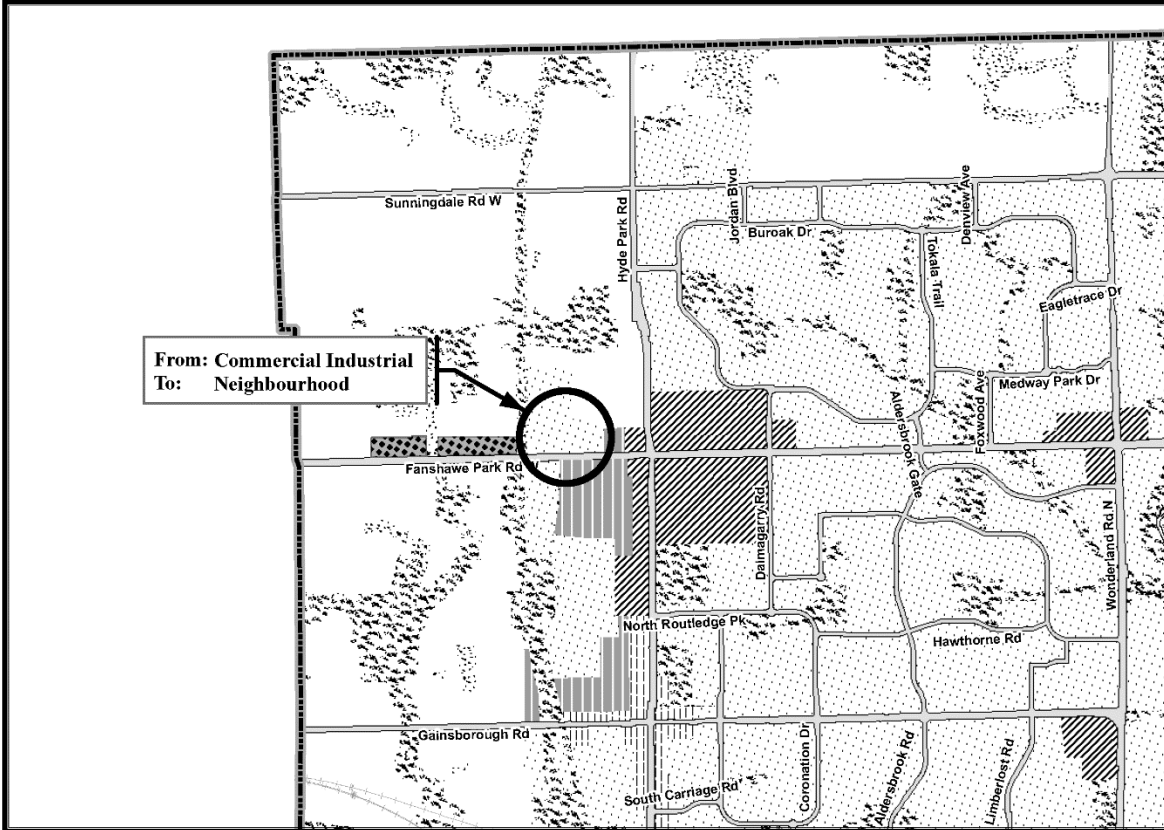
**CITY OF LONDON
Official Plan**

**LONDON PLAN MAP 1
- PLACE TYPES -**

PREPARED BY: Planning & Development



File Number: O-9595
Planner: BC
Technician: RC
Date: 2024/04/25



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 # TO OFFICIAL AMENDMENT NO. _____</p> <p>PREPARED BY: Planning & Development</p>	<p>Scale 1:30,000</p> <p>Meters</p>	<p>FILE NUMBER: O-9595</p> <p>PLANNER: BC</p> <p>TECHNICIAN: RC</p> <p>DATE: 4/25/2024</p>
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Schedule 9 to Appendix A – Industrial Land Conversion

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 change the designation of the subject lands identified in Map 1 – Place Types – of the City of London FROM Commercial Industrial Place Type TO Urban Corridors Place Type, change the designation of the subject lands identified in Map 1 – Place Types – of the City of London FROM Neighbourhoods Place Type TO Urban Corridors Place Type and delete Specific Policies 1150 and 1151 for the Commercial Industrial Place Type of Official Plan, The London Plan, for the City of London related to the York Street Corridor.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to all lands located at 340 Colborne Street, 343 Maitland Street, 330 William Street, 415 – 799 York Street, 400 – 660 York Street, 345 Lyle Street, 341 – 349 Glebe Street, 354 Glebe Street, and 700 – 800 York Street in the City of London.

C. BASIS OF THE AMENDMENT

Based on an Official Plan Review and Land Needs Assessment the amendment would convert the subject lands, including adjacent non-industrial lands within the industrial corridor, from an industrial land use to a non-industrial land use. The inclusion of a non-industrial land use conversion is consistent with the land use conversion along the industrial corridor. The proposed industrial land conversions are based on an evaluation of criteria that includes, but is not limited to, compatibility of proposed land use, economic development initiatives and strategic locations, feasibility of municipal servicing, environmental or other constraints, and adequate parcel size as well as market demands from target industrial sectors. The identified specific policies for the York Street Corridor conform with permitted uses under the Urban Corridors Place Type and are no longer required following redesignation of the subject lands.

D. THE AMENDMENT

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

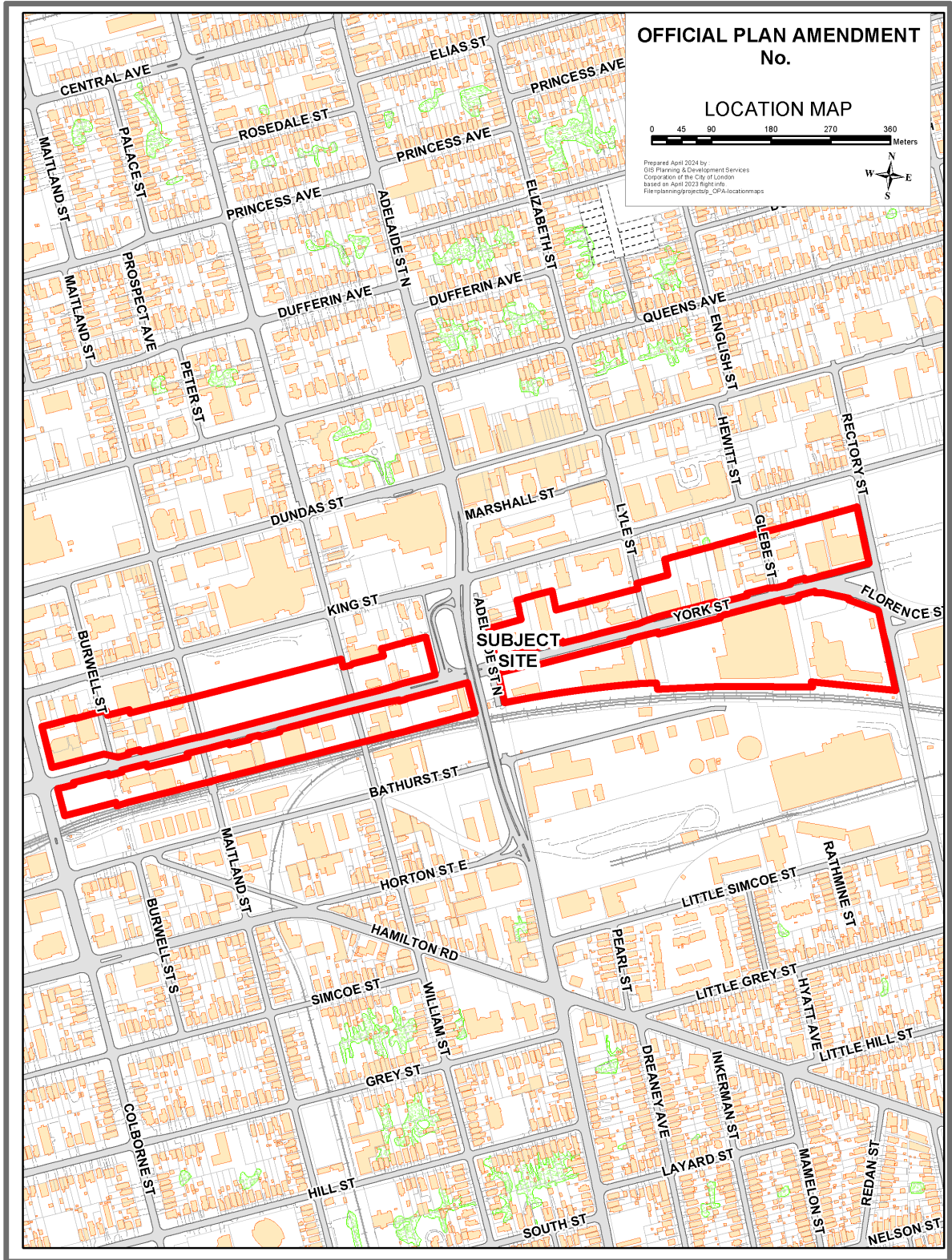
- i. Map 1 – Place Types, to the Official Plan, The London Plan, for the City of London Planning Area is amended by changing the designation of the identified subject lands from Commercial Industrial Place Type to Urban Corridors Place Type and by changing the designation of the identified subject lands from Neighbourhoods Place Type to Urban Corridors Place Type, as indicated on “Schedule 1” attached hereto.
- ii. Specific Policies for the Commercial Industrial Place Type of Official Plan, The London Plan, for the City of London is amended by deleting the following:

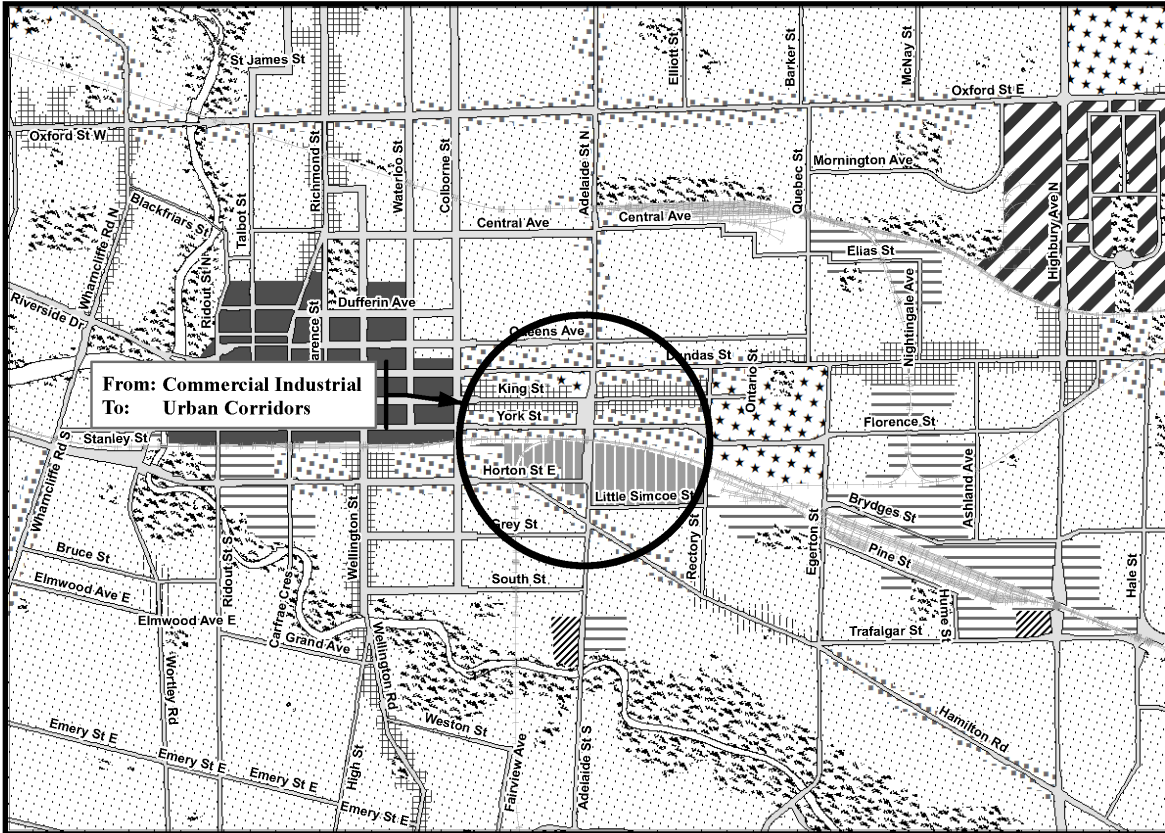
YORK STREET CORRIDOR

1150_ The range of permitted uses will be restricted to uses with low outdoor storage needs or uses that do not generate noise, odour, and/or dust impacts.

1151_ For the portion of the York Street corridor between Maitland and William Streets, in addition to the permitted uses of the Commercial Industrial Place Type, the lands located on the south side of York Street, between Maitland Street and William Street, may also permit small-scale service office uses up to a maximum gross floor area of 2,000m².

“Schedule 1”





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 # TO OFFICIAL AMENDMENT NO. _____</p> <p>PREPARED BY: Planning & Development</p>	<p>Scale 1:30,000</p> <p>Meters</p>	<p>FILE NUMBER: O-9595</p> <p>PLANNER: BC</p> <p>TECHNICIAN: RC</p> <p>DATE: 5/15/2024</p>
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Schedule 10 to Appendix A – Industrial Land Conversion

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

A. PURPOSE OF THIS AMENDMENT

- B. The purpose of this Amendment is to change the designation of the subject lands identified in Map 1 – Place Types – of the City of London FROM Light Industrial Place Type TO Commercial Industrial Place Type.

C. LOCATION OF THIS AMENDMENT

This Amendment applies to all lands located at 295 Rectory Street, 600 - 760 Little Simcoe Street, 220 – 230 Adelaide Street North, 229 Adelaide Street North, 268 - 278 Maitland Street, 663 – 665 Bathurst Street, 558 – 580 Horton Street East, 561 – 573 Horton Street East, 501 – 575 Bathurst Street, 570 Bathurst Street, 270 – 300 William Street, and 273 – 295 William Street in the City of London.

D. BASIS OF THE AMENDMENT

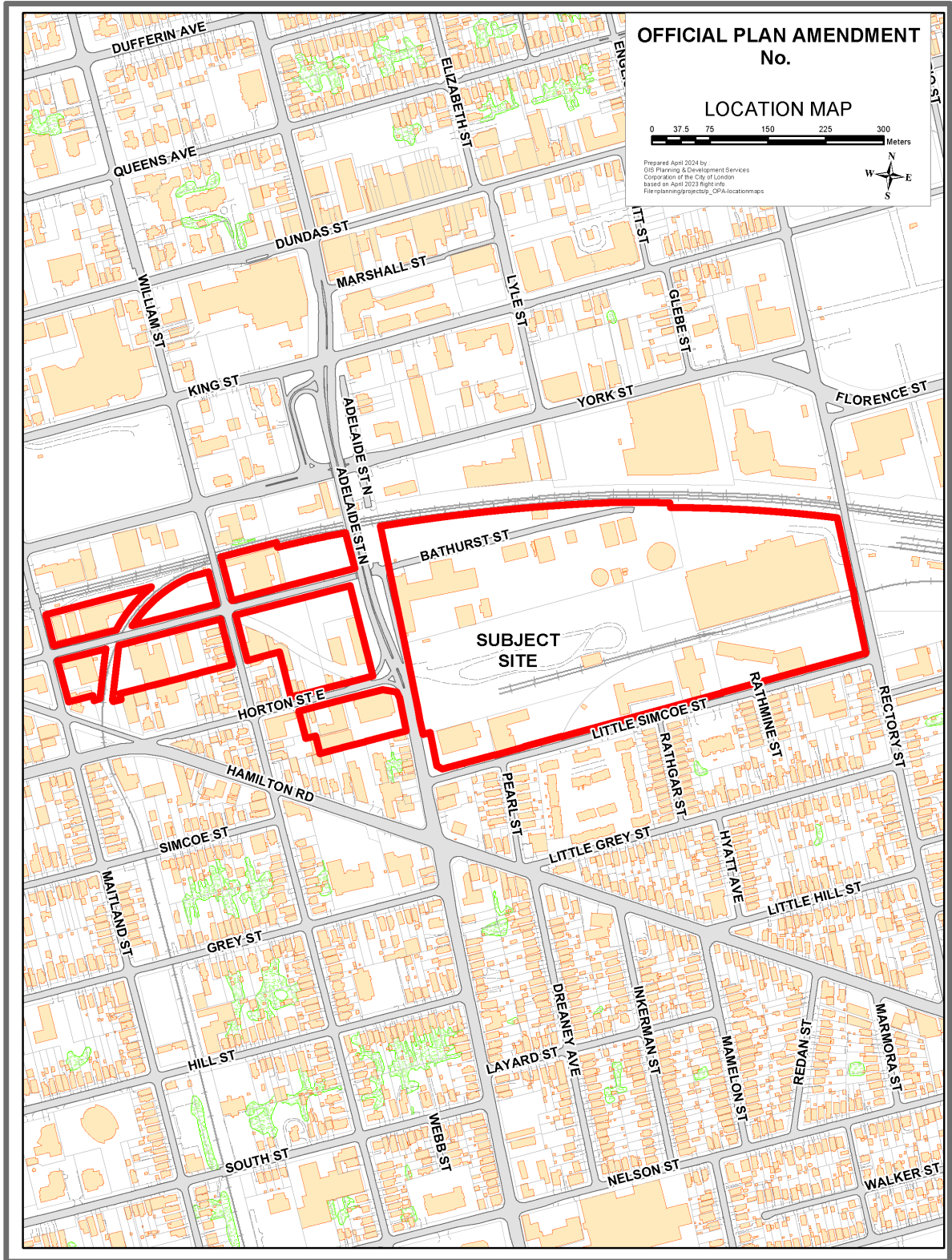
Based on an Official Plan Review and Land Needs Assessment the amendment would convert the subject lands from an industrial land use to a non-industrial land use. The proposed industrial land conversions are based on an evaluation of criteria that includes, but is not limited to, compatibility of proposed land use, economic development initiatives and strategic locations, feasibility of municipal servicing, environmental or other constraints, and adequate parcel size as well as market demands from target industrial sectors.

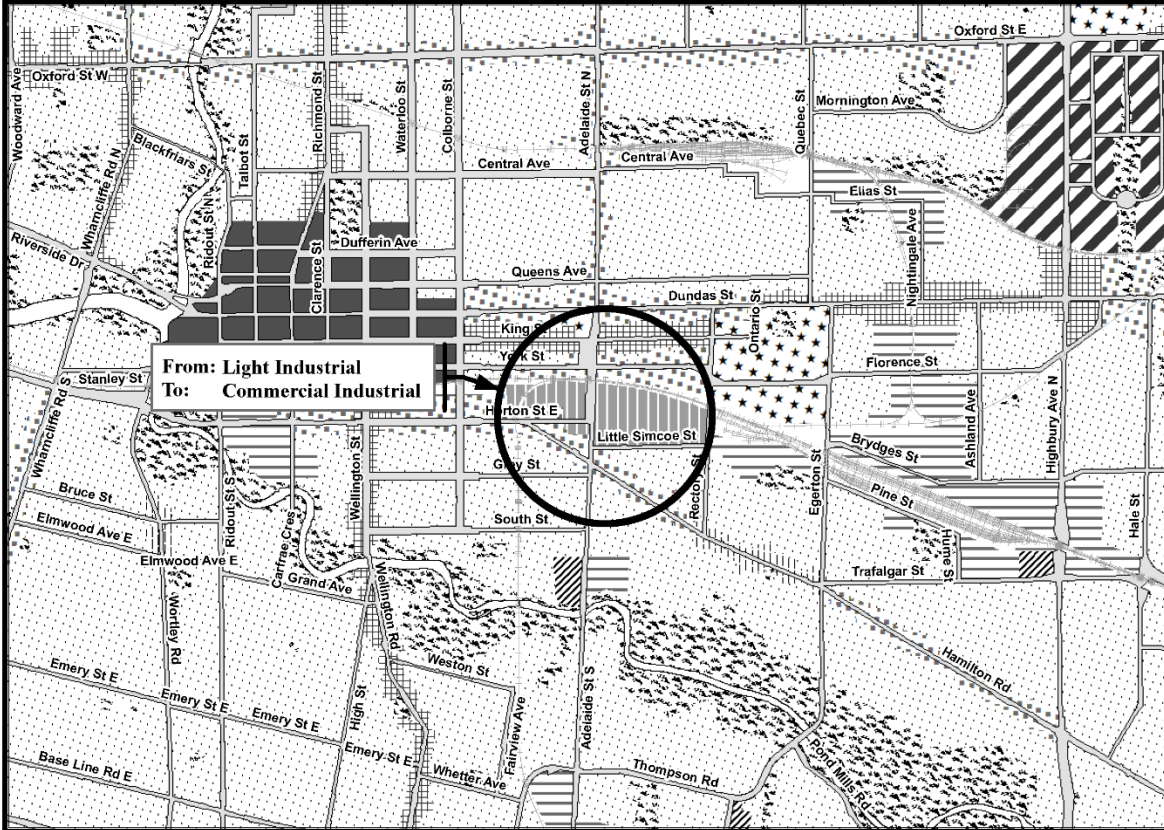
E. THE AMENDMENT

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

- i. Map 1 – Place Types, to the Official Plan, The London Plan, for the City of London Planning Area is amended by changing the designation of the identified subject lands from Light Industrial Place Type to Commercial Industrial Place Type, as indicated on “Schedule 1” attached hereto.

"Schedule 1"





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 style="text-align: center;">SCHEDULE # TO OFFICIAL AMENDMENT NO. _____</p> <p style="font-size: small; text-align: center;">PREPARED BY: Planning & Development</p>	<p>Scale 1:30,000</p> <p>Meters</p>	<p>FILE NUMBER: O-9595</p> <p>PLANNER: BC</p> <p>TECHNICIAN: RC</p> <p>DATE: 5/3/2024</p>
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Appendix B – Draft LNA Community Growth

2021-2046 Draft Land Needs Assessment (Community Growth)



2022-2046

**DRAFT
Land Needs
Assessment:
Community
Growth**

**Planning and Development
City of London**

June 2024 DRAFT



Table of Contents

1	INTRODUCTION.....	3
1.1	Policy Context	3
1.1.1	The <i>Planning Act</i>	4
1.1.2	Provincial Policy Statement, 2020	4
1.1.3	Draft Provincial Planning Statement, 2024	5
1.1.4	City of London's Official Plan (The London Plan)	5
1.2	Housing and Employment Growth Forecast	6
1.2.1	Reference Growth Scenario (2021-2051)	6
1.2.2	Ministry of Finance Population Projections (2022 – 2046).....	6
1.3	Methodology.....	6
1.3.1	Residential Assumptions	7
1.3.2	Non-Residential Assumptions	8
1.3.3	Vacant Land Inventory	10
1.3.4	Contingency Land Supply	11
1.4	Planning Policy Areas.....	11
1.5	Industrial Land Needs Study	13
2	RESIDENTIAL DEMAND AND SUPPLY	13
2.1	Population Growth and Forecast	13
2.2	Housing Growth and Forecast.....	14
2.3	Residential Overall Demand.....	15
2.4	Residential Greenfield Demand.....	17
2.5	Residential Greenfield Supply	17
2.6	Greenfield Residential Lands Analysis	18
3	NON-RESIDENTIAL DEMAND AND SUPPLY	19
3.1	Commercial Growth Forecasts	20
3.2	Institutional Growth Forecasts	20
3.4	Commercial and Institutional Greenfield Demand	21
3.5	Commercial and Institutional Land Supply	22
3.6	Greenfield Non-Residential Lands Analysis	22
4	CONCLUSIONS	23

1 INTRODUCTION

This report documents the findings of the City of London's Land Needs Assessment (LNA) for Community Growth. The LNA has been undertaken as part of the Section 26 Official Plan Review of the City of London's Official Plan, The London Plan. The overall purpose of the Official Plan Review is to comprehensively update The London Plan to ensure its consistency with the Provincial Policy Statement (PPS) and other Provincial legislation. As such, the purpose of the LNA is to evaluate the existing land supply against projected demand based on growth in population, housing, and employment over the planning horizon of The London Plan.

The basis of the LNA is population growth, housing, employment, and non-residential (commercial and institutional) space projections for the 25-year planning horizon from 2022 to 2046. The Ministry of Finance 2023 population growth forecast was incorporated into the land calculations to conform with new direction under the draft Provincial Planning Statement (April 2024) and represent higher than anticipated growth trends. Assumptions approved by Municipal Council on December 13, 2022, were included to calculate land required to accommodate anticipated growth.

Undertaking the LNA provides timely opportunity for the City of London to address housing and land supply concerns. The LNA will support ongoing initiatives related to the Provincial Housing Target of creating 47,000 new units by 2031. Results from this study will also assist in the alignment of infrastructure and engineering requirements related to anticipated growth.

Based on the result of the LNA, a determination will be made regarding justification under the provisions of the PPS and The London Plan to add additional lands into the City's urban area (Urban Growth Boundary) to accommodate the projected growth. Should the result of the LNA demonstrate the need for expansion, City Staff will bring forward a recommendation to Municipal Council requesting direction to initiate an Urban Growth Boundary Review. This report will not make specific recommendations on the areas to be considered for a subsequent Urban Growth Boundary Review or expansion.

Finally, it should be noted that industrial land needs were evaluated in parallel with this LNA and the findings will be presented in a separate report.

1.1 Policy Context

This Land Needs Assessment was developed within the context of the provincial legislation, Provincial Policy Statement, the new draft Provincial Planning Statement, and the City of London's Official Plan (The London Plan).

1.1.1 The *Planning Act*

The *Planning Act* is provincial legislation governing land use planning in Ontario and outlines the statutory requirements for municipal planning documents and processes. The *Planning Act* also identifies matters of provincial interest in key areas, including the appropriate location of growth and development, the orderly development of safe and healthy communities, and the adequate provision of a full range of housing including affordable housing.

Section 26 of the *Planning Act* requires municipalities to undertake an official plan review 10 years after a new plan is in effect, and every 5 years thereafter. The official plan review requires that all policies of the plan be updated to ensure they have regard to matters of provincial interest and are consistent with all legislation and policy statements issued by the Province.

Official plan reviews under the *Planning Act* enable municipalities to undertake a municipal comprehensive review as defined in the Provincial Policy Statement (PPS).

1.1.2 Provincial Policy Statement, 2020

The Provincial Policy Statement (PPS), 2020, provides policy direction on planning for settlement areas as the focus of growth and development. The LNA is intended to meet the requirements set out in Policy 1.1.2 of the PPS which states that:

“Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of up to 25 years, informed by provincial guidelines. ... Within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas.”

Further, municipalities shall maintain lands designated and available for residential growth for a minimum of 15 years and lands with servicing capacity sufficient to provide for at least a 3-year supply of residential units (policy 1.4.1).

Policy 1.1.3 of the PPS provides policy guidance on settlement areas and criteria to ensure that expansions to settlement area boundaries will only be considered through a municipal comprehensive review. The comprehensive review is defined in the PPS as the only means by which municipalities can consider an expansion of their settlement area boundaries or a conversion of employment lands (i.e. industrial lands) to other land uses based on a review of population and employment projections.

Expansions to settlement areas boundaries must consider sufficient opportunities for growth that are not available through intensification, redevelopment and/or new development within designated growth areas, the availability of infrastructure and public service facilities, alternative locations to avoid development in prime agricultural areas, the compliance with the minimum distance separation formulae, and the mitigation of impacts on adjacent agricultural operations (policy 1.1.3.8).

1.1.3 Draft Provincial Planning Statement, 2024

On April 10, 2024, the Province introduced a new draft Provincial Planning Statement (PPS). While still in draft, the new 2024 PPS includes significant changes to growth management policy framework and additional direction on land needs assessment.

Proposed policy 2.2.1 of the draft PPS requires municipalities base population and employment growth forecasts on Ministry of Finance 25-year projections and allows them to modify the forecasts as appropriate.

Proposed policy 2.1.3 provides that sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a minimum 20-year time horizon up to 30 years. The draft PPS maintains the land supply requirements in the 2020 PPS, including a 15-year supply of residential lands and a 3-year supply of lands with servicing capacity.

The draft PPS identifies large and fast-growing municipalities, including the City of London, and encourages them to plan for 50 residents and jobs per gross hectare in designated growth areas also known as Greenfields. (draft policy 2.3.1.5).

1.1.4 City of London's Official Plan (The London Plan)

The London Plan was adopted by City Council and approved by the Province in 2016. The London Plan horizon was first prepared under the 2014 PPS which required a maximum planning horizon of 20 years but was approved based on the 2020 PPS that requires a planning horizon of up to 25 years. For the purposes of the Land Needs Assessment, City Council approved The London Plan horizon to increase from 20 years to 25 years, which is consistent with the 2020 PPS and the new draft 2024 PPS.

The London Plan established a policy framework for growth management over the planning horizon and places an emphasis on “inward and upward” growth to achieve a compact form of development with its intensification target. The Plan targets a minimum of 45% of all new residential units is to be achieved within the Built Area Boundary (BAB). New development within the BAB generally takes the form of infill, intensification or redevelopment.

Where it is determined that an expansion of the City's Urban Growth Boundary is justified to meet required land needs through a Land Needs Assessment, criteria outlined in The London Plan (policy 76) must be satisfied. The criteria determine the preferred location for settlement area expansion and are consistent with the 2020 PPS, as well as the draft 2024 PPS.

Given that portions of The London Plan first came into effect in 2017, a review of the Plan is not required until 2027. However, the phased approach for the Section 26 Official Plan Review will create flexibility to meet the statutory requirement for the review by 2027 and expedite the LNA process to determine the land required to accommodate the projected growth and support the creation of 47,000 new units by 2031.

1.2 Housing and Employment Growth Forecast

1.2.1 Reference Growth Scenario (2021-2051)

In December 2022, Municipal Council endorsed the Reference Scenario in final report prepared by Watson and Associate Economists, entitled “Population, Housing and Employment Growth Projection Study, 2021-2051”. The Reference Scenario was endorsed as the City of London’s corporate growth forecast, including for use in *Planning Act* and *Development Charges Act* initiatives.

In April 2024, Council directed staff to apply the 25-year planning horizon to the Land Needs Assessment.

1.2.2 Ministry of Finance Population Projections (2022 – 2046)

Notwithstanding that Council approved corporate growth projections in December 2022, the Land Needs Assessment applies the 2023 Ministry of Finance populations projections for land use purposes, consistent with the new PPS direction.

As per the new draft policy direction, the Ministry of Finance annual population projections (2022 to 2046) were applied to the land demand calculations. To combine the Ministry of Finance projections with the Council-endorsed projections, the land demand calculations incorporate the most recent Ministry of Finance population dataset while maintaining the Council-endorsed assumptions related to employment activity rates, gross floor area calculations, and housing splits.

The Ministry of Finance population projections for the Middlesex County include the City of London. The share of London’s population has been 84% of the Middlesex County population from 2001 to 2021, which was considered in the Council endorsed projection scenario. For the purposes of the LNA, the 84% share was applied to update the City’s population growth forecasts over the 25-year planning horizon.

1.3 Methodology

The methodology applied to the Council endorsed Reference Growth Scenario was both peer-reviewed and applied to previous iterations of growth modelling for City of London. The approach incorporated both the “top-down” cohort-survival forecast methodology and a “bottom up” household formation methodology. Noting the rigor behind the growth methodology, the demand assumptions have been maintained and applied to the Ministry of Finance 2023 population projections for the purposes of this land needs assessment.

1.3.1 Residential Assumptions

Intensification

Residential land demand calculations contemplate a 45% Intensification Target over the Council approved 25-year planning horizon – as a result the remaining 55% of demand is expected to be accommodated through greenfield development. Housing share and density assumptions (units per hectare or “UPH”) were analyzed against local trends and comparable municipal examples, and feedback from the Housing Supply Reference Group was also considered.

Housing Share

The housing share (or “housing split”) calculation incorporated the 45% intensification rate was analyzed by residential density type for each planning policy area. It is important to note that strong housing demand is projected for the MDR and HDR housing forms. HDR housing share has significantly increased, and the density type projected to comprise a greater proportion of the expected growth compared to historic trends.

The City of London overall housing share assumption for growth was calculated as follows:

- 27% low density residential (LDR) (i.e., single and semi-detached dwellings)
- 28% medium density residential (MDR) (i.e., rowhouses and townhouses)
- 45% high density residential (HDR) (i.e., apartments)

By planning policy area, the housing shares are: 5% LDR, 22% MDR, 73% HDR within the Built-Area Boundary; 46% LDR, 32% MDR, and 22% HDR for designated greenfield; and a small allocation of rural area housing growth being anticipated at 100% LDR.

Historically, LDR units accounted for 42% of all new greenfield development between 2017 and 2023 whereas an assumed 46% LDR share was applied to greenfield demand and supply calculations. This assumption aligns with the projected LDR share (46%) of new greenfield residential development in the endorsed Reference Scenario.

Density (Units Per Hectares)

In the Council-endorsed Reference Growth Scenario, housing unit per hectare (UPH) density assumptions by structure type were identified based on a review of historical density trends in the City of London and a review of trends and assumptions used in other municipalities.

The density assumptions are summarized as follows, and were applied to the land demand and supply calculations:

- A density of 20 units per hectare for LDR units. The density is reflective of the trend towards smaller lots and other low density housing forms, such as semi-detached units and additional residential units.

-
- The MDR density is 44 units per hectare. The density is reflective of a trend towards a wider range of MDR housing options, including stacked-townhouses and back-to-back townhouses, which typically have higher densities than conventional townhouses.
 - The HDR density is 125 units per hectare. The London Plan generally encourages low-rise apartments up to six storeys within the greenfield area of the Neighbourhoods Place Type. Other Place Types in Greenfield Areas may permit higher densities, including various corridors, nodes or shopping areas, subject to further planning study.

Persons Per Unit (PPU)

Following considerable deliberations related to an appropriate UPH application methodology, the new draft PPS was released with direction for “large and fast-growing municipalities”, noting that London is included in this category of municipality. Under the draft policy 2.3.1.5, municipalities are encouraged to apply a target of 50 residents or jobs per gross hectare in designated growth areas.

For the purposes of the LNA report, the greenfield target translates to approximately 2.5 persons per unit (PPU) which represents at least 20 UPH required in the Greenfield Area. This is consistent with an average of 2.5 PPU over the projection period in the endorsed Reference Scenario. By applying the average of 2.5 PPU, it was assumed that a mix of housing forms with the density of 20 UPH for LDR development will meet this proposed policy direction.

1.3.2 Non-Residential Assumptions

Assumptions for non-residential growth accounted for the total space needs and density trends observed in London and across Ontario. Key variables incorporated into the land calculations included: anticipated intensification rate for non-residential development by sector, employment activity rate, floor space per worker, and floor area ratio.

By applying the same approach that was used to determine residential Greenfield demand, it was assumed that a certain proportion of the demand will be met through intensification of lands within the Built Area. To determine the potential impact of intensification, historic building permit activity was reviewed to verify the extent of intensification by sector.

An employment activity rate is defined as the number of local jobs per capita for a municipality. The average floor space per worker (FSW) is a calculated value indicative of expected space needs per employee. Both variables were incorporated into the GFA required to accommodate employment growth by sector.

To convert the demand for institutional and commercial GFA to a demand for land, floor area ratios (FAR) assumptions were utilized. FAR is the area of a building to the total area of the site it occupies. Employment FARs were established in the 2006 Land Needs Background Study based on a review of existing sites and building permits. Those FARs were carried

forward to the 2011 Land Needs Study and were adjusted based on industry trends for the purposes of this Land Needs Assessment.

Institutional

Institutional land demand calculations contemplated an 82% intensification rate over the 25-year horizon, based on historic trends. It should be noted that the sector does not follow a linear growth projection despite the data presented in growth modelling. Development in the sector is less frequent but will build to meet demand, as required and when funding is available. This pattern of development is caused by the sector being primarily reliant on government funding mechanisms and organization-based capital planning. Furthermore, large-scale institutional use (e.g. hospitals, post-secondary schools) are anticipated to develop as intensification whereas community services and hubs (e.g. fire stations, schools) are population serving and tend to follow new growth.

The institutional sector FSW is assumption is 65m² (700ft²) which is representative of non-residential density trends noted in historic data and comparable municipal examples. This assumption accounts for the varying characteristics and scale of land uses within the sector noting that the space requirements for a medical office differ from those of a police station, community centre, or elementary school. An average FAR of 0.42 was assumed for the sector again noting variations depending on form and use. Land calculations considered smaller FAR requirements for neighbourhood streets and larger FAR for higher order streets to reflect to expected land use. The employment activity rate within the sector is expected to remain relatively consistent with growth expected from 0.131 to 0.137 over the planning horizon.

Commercial

The commercial assumptions considered both the retail and office demand due to the highly similar land use trends in greenfield development. It was determined that an intensification rate corresponding to residential land use would be appropriate given the inherent link between population growth and commercial demand. As such, a corresponding 45% intensification rate was incorporated in the commercial land demand calculations over the 25-year planning horizon marking a slight increase in previous growth studies which assumed a rate of 40%.

The scale of commercial growth is anticipated to vary depending on the needs of the service area's population however greenfield development is expected to occur more often within mixed-use development rather than traditional standalone spaces, and to develop with smaller footprints. Current land-use trends were evaluated to determine an appropriate standalone commercial demand assumption and it is anticipated that demand will largely be accommodated through mixed-use development. A commercial form split of 87% mixed-use and 13% standalone commercial was determined to be appropriate for greenfield land requirements and to mitigate the double counting of land requirements. This assumption is consistent with general policies of The London Plan which encourage mixed-use development forms to achieve compact and complete communities. Based on this

assumption, it would be expected that lands identified for residential demand would include commercial elements and mixed-use development.

The blended office and retail FSW assumption is roughly 34m² (370ft²) per employee over the 25-year planning horizon. This FSW assumption is notably lower than the previous assumption 39.5m² (425ft²) from a 2018 Population, Housing and Employment Growth Study and indicative of the trend towards smaller commercial footprints. This assumption is a departure from historical expectations and represents the ongoing shift in space requirements for both retail and office use.

The inherent link between population growth and demands for services have impacted the employment activity rate for the sector. Based on the optimistic population growth forecast provided by the Ministry of Finance, the employment activity rate is expected to climb from 0.159 to 0.190 over the planning horizon due to the recovery from pandemic-related job losses.

An average FAR of 0.30 was assumed for the sector. Land calculations considered a relatively consistent retail FAR between 0.25 and 0.30 based on location. The office portion of the commercial sector varies with prime office space located downtown and lower office floor area expectations (0.05 FAR to 0.10 FAR) outside of the downtown core. The GFA calculation for the commercial sector discounted pandemic-related job recovery from 2022-2026 noting that the recovery would account for pre-existing employment opportunity and not require new floorspace.

Table 1 shows the non-residential assumptions incorporated into the GFA calculations.

	Intensification	Floor Space per Worker Assumption	Floor Area Ratio (FAR) Assumption
Commercial	45%	34m ² (370ft ²)	0.30
Institutional	82%	65m ² (700ft ²)	0.42

Table 1. Commercial and Institutional GFA calculations (2022-2046)

1.3.3 Vacant Land Inventory

The City’s Vacant Land Inventory (VLI) tracks vacant land for potential development within the City’s Urban Growth Boundary and is comprised of two different studies: residential and non-residential (i.e., industrial, commercial, and institutional). The VLI is updated quarterly to reflect the most up-to-date capacity for future residential and non-residential development at a snapshot in time. The VLI includes categories of development with density assumptions for vacant lands as well as development applications within the “development pipeline”.

For the purposes of the Land Needs Assessment, the VLI has been updated to align with street typologies and place types in The London Plan. The maintenance of the VLI is consistent with policy direction conforming with the new draft PPS (draft policy 2.1.4) and current PPS (policy 1.4.1) related to residential land supply to accommodate growth. Additionally, the density assumptions stated in Section 1.3.1 of this report were applied to the

VLI in conformity with new draft PPS direction (draft policy 2.3.1.5) on greenfield target of 50 residents and jobs per gross hectare.

It should also be noted that the VLI supply includes six sites for industrial land conversion to a non-industrial use that were approved by Council on April 2, 2024.

1.3.4 Contingency Land Supply

On April 23, 2024, Council approved the Targeted Actions to Increase London's Housing Supply: Supporting Council's Pledge for 47,000 Units by 2031. The Targeted Actions report notes that the LNA will include consideration of housing supply contingency to ensure an appropriate supply is available in the short and long-term.

As part of this Section 26 Official Plan review, the planning horizon has been extended from 20 years to 25 years. This means that an additional five years of growth is required to be included within population, housing, and employment space forecasts. The additional 5 years is also required within the vacant land supply within the City's Urban Growth Boundary.

The 2020 PPS (policy 1.4.1.a) directs municipalities to maintain a minimum of 15 years of designated land available for development. The draft 2024 PPS continues this policy requirement of a minimum 15 years of land supply (draft policy 2.1.4.a).

The City is required to review and update its official plan within every five years (*Planning Act*, s. 26(1.1)(b)) for the rest of the planning horizon. By introducing a 25-year planning horizon, flexibility is built into the growth management process. This exceeds the PPS requirement and is intended to address any 5-year periods of higher-than-expected growth in population, housing or employment.

1.4 Planning Policy Areas

The Land Needs Assessment allocates residential and non-residential demand forecasts into two planning policy areas of Built Area and Greenfield Area as identified in The London Plan. Figure 1 illustrates the location of each planning policy area for the City of London identified in The London Plan. There are some concepts used in this report that are explained below. It should be noted that both Greenfield and Built Areas do not represent land use designations but are intended for use as planning and monitoring tools.

Built Area / Built Area Boundary

The lands located within the Built Area Boundary (BAB) are referred to as the Built Area. The BAB is defined generally as the line circumscribing all lands that were substantively built out as of the year of Provincial approval of The London Plan (i.e. 2016). The BAB is fixed in time for the purposes of implementing and monitoring the City's target for intensification.

Greenfield Area

The Greenfield Area is the area between the City's Built Area Boundary and Urban Growth Boundary.

Urban Growth Boundary

The Urban Growth Boundary (UGB) means the boundary beyond which urban uses will not be permitted. Generally, the UGB separates the urban areas of the city from the rural areas of the city.

Intensification

Intensification means the development of a property, site, or area at a higher density than currently exists. Development that occurs within the BAB is considered as intensification.

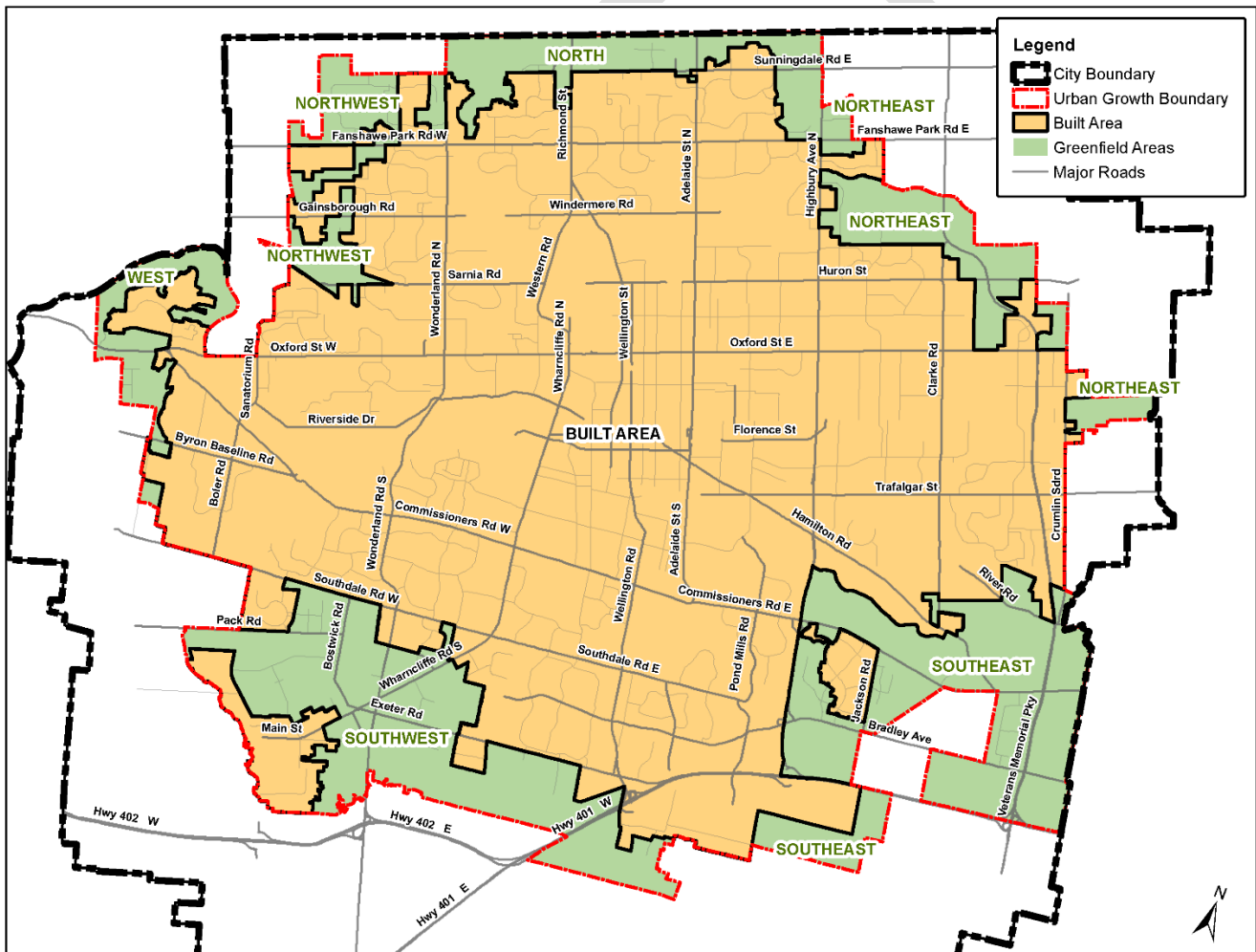


Figure 1. City of London Land Area Classifications (2016)

The Land Needs Assessment focuses on the Built Area and Greenfield Area to evaluate overall land requirements to determine whether an expansion of the Urban Growth Boundary is justified. While the Built Area is the focus of intensification with 45% of new housing units, Greenfield Area demand required to accommodate the projected growth is the primary factor determining whether additional lands will be required. If opportunities to accommodate growth do not exist within the Greenfield Area, then the City will need to consider an expansion to the Urban Growth Boundary.

1.5 Industrial Land Needs Study

A review of industrial land requirements is being undertaken concurrently in a separate study to determine if there is a need to consider the inclusion of additional land into the City's Urban Growth Boundary to accommodate projected strategic employment growth. The report will be targeted for presentation to Municipal Council in Q3 of 2024.

2 RESIDENTIAL DEMAND AND SUPPLY

2.1 Population Growth and Forecast

The most recent Ministry of Finance projections indicate that the Middlesex County permanent population was approximately 531,930 as of 2022, increased from 517,900 in 2021. The City of London accounted for approximately 84% of total population growth in the Middlesex County from 2001 to 2021. Accordingly, the City's permanent population is 446,090 people in 2022.

The City of London is anticipated to grow to 685,490 people in 2046, increasing by approximately 239,400 people. This represents an average annual growth rate of 1.8% over the 25 years. Table 2 below shows projected growth and annual growth rates for each 5-year period.

There are considerations related to demographic, economics and socioeconomics that are anticipated to influence population growth trends in the City of London, as follows:

- The City's population is aging, driven by the Baby Boomer age group. The 75 years plus age group (including Baby Boomers) is expected to increase from 9% to 12% over the forecast. The adult population of 20 to 54 years old is projected to be the largest age cohort group but is projected to decline in relative terms from 48% to 47% of total population.
- The City is anticipated to be more reliant on net migration as a source of population as opposed to natural increase (births minus deaths).

- Net migrations are higher than the 20-year historical average and are more reflective of the recent post-2016 period. Forecasted net migration trends are reflective of steady growth anticipated in local and regional economies and forecasted work-at-home opportunities with over 90% of migrants projected to be working-aged adults and children. Net migration is also reflective of the perceived attractiveness of the City to empty nesters and retired/semi-retired persons re-locating from communities.
- Population growth associated with natural increase (births minus deaths) is forecast to continue decline due to the aging of the City’s population.

Year	Population	Annual Growth	Annual Growth Rate
2022	446,087	-	-
2026	512,187	16,525	3.5%
2031	552,253	8,013	1.5%
2036	594,481	8,446	1.5%
2041	638,831	8,870	1.4%
2046	685,490	9,332	1.4%
Total (2022-2046)	239,403	10,237	1.8%

Table 2. Population Growth Forecasts (2022-2046)

The most recent Ministry of Finance population forecast projects an additional 67,680 persons at the end of 2046 relative to the 2022 Ministry of Finance projection. Correspondingly, the housing and employment growth are forecast to increase over the 25-year period.

The 2022-2026 period has the highest population growth rate over the 25-year planning period, which represents a more aggressive growth rate than the growth rate of 2.0% projected in the endorsed Reference Scenario over the 2021-2026 period.

2.2 Housing Growth and Forecast

To convert the Ministry of Finance population projections to the City's housing demand, the persons per unit (PPU) assumptions in the endorsed Reference Scenario were applied. PPU refers to the number of individuals living in a housing unit and is the same as the term “household size” used by Statistics Canada. The term “household size” refers to the number of persons in a private household.

Assuming an average PPU of 2.5 over the 2022 to 2046 period based on the endorsed Reference Scenario, the City’s permanent households are forecast to increase from 178,440 to 285,620, growing at a rate of 2.0% annually. This represents an additional 24,840 housing units by 2046 compared to the endorsed Reference Scenario. This number translates to an annual average of 1,040 units per year over the 2022 to 2046 period.

Table 3, below, shows projected household growth, including annual growth rates. In total, the City is expected to require the addition of 107,190 new units between 2022 and 2046 to accommodate the projected population. This represents an annual average of 4,466 units, which is significantly higher than the historical average of 2,390 units annually between 2006 and 2021. The City experienced a relatively higher residential growth over the 2016 to 2021 period with an annual average of 3,100 new units.

Year	Housing Units	Annual Growth	Annual Growth Rate
2022	178,435		
2026	204,875	6,610	3.5%
2031	221,788	3,383	1.6%
2036	240,680	3,778	1.6%
2041	261,816	4,227	1.7%
2046	285,621	4,761	1.7%
Total (2022-2046)	107,186	4,466	2.0%

Table 3. Housing Growth Forecasts (2022-2046)

Residential growth from building permits has slowed as of December 2023 relative to previous years. Notwithstanding this trend, the housing growth is anticipated to exceed the growth from the 2016 to 2021 period over the 2022 to 2046 period. The growth is projected to be highest between 2022 and 2026, averaging approximately 6,610 new units annually. The City of London is expected to require the addition of 43,350 units over the 2022-2031 period based on projected growth. The provincial housing target of 47,000 units is greater than projected growth and additional actions to meet the target are being identified through separate reporting.

The City's housing development has shifted towards medium- and high-density housing, largely driven by demographics, including aging population and strong net migration, and declining housing affordability associated with low-density housing options. The low-density share of new units built between 2006 and 2010 was 51% and decreased to 30% over the 2016 to 2021 period. This trend is anticipated to continue in slightly varying degrees over the 25-year planning period.

2.3 Residential Overall Demand

Tables 4 and 5 summarize the 5-year and annual housing demand forecast by structure type over the 2022 to 2046 period. The overall new housing development is expected to comprise 27% LDR, 28% MDR and 45% HDR units.

5-Year Period	LDR	MDR	HDR	Total
2022-2026	7,159	6,382	12,899	26,440
2026-2031	5,077	4,475	7,361	16,914
2031-2036	5,473	5,204	8,215	18,892
2036-2041	5,707	6,114	9,315	21,135
2041-2046	5,836	7,229	10,740	23,805
Total (2022-2046)	29,253	29,404	48,529	107,186

Table 4. 5-Year Housing Demand by Structure Type (2022-2046)

5-Year Period	LDR	MDR	HDR	Total
2022-2026	1,790	1,596	3,225	6,610
2026-2031	1,015	895	1,472	3,383
2031-2036	1,095	1,041	1,643	3,778
2036-2041	1,141	1,223	1,863	4,227
2041-2046	1,167	1,446	2,148	4,761
Average (2022-2046)	1,219	1,225	2,022	4,466

Table 5. Annual Housing Demand by Structure Type (2022-2046)

To achieve the 45% intensification target over the 2022-2046 period, approximately 48,440 units will need to be constructed within the BAB, averaging 2,020 units per year as shown in Table 6. Of these units inside the BAB, 5% will be LDR, 22% MDR and 73% HDR units. The annual average of 72% of HDR units that was experienced between 2017 and 2021 is expected to continue over the 25-year horizon. The new housing growth in the BAB is anticipating a lower share of LDR units and a higher share of MDR units than the historic averages of 16% of LDR units and 15% of MDR units per year during the 2017-2021 period. Greenfield housing demand is projected to be more oriented towards LDR and MDR forms. 120 out of 29,253 LDR units are expected to be in rural area over 2022 and 2046, averaging 5 units per year. The City of London has had an annual average of 6 low density residential units in rural areas between 2019 and 2023.

Number of Units	LDR	MDR	HDR	Total
Built Area Units	2,428	10,678	35,334	48,440
Greenfield Units	26,705	8,726	13,196	58,626
Total	29,253	29,404	48,529	107,186

Table 6. Built Area and Greenfield Housing Growth Forecast based on 45% Intensification Scenario (2022-2046)

2.4 Residential Greenfield Demand

The City of London is expected to require approximately 1,870 hectares of greenfield lands to accommodate 58,630 units over 2022 to 2046 period, as shown in Table 7.

5-Year Period	Greenfield Units	Greenfield Lands Required (ha)
Low Density Residential		
2022-2026	6,544	327
2026-2031	4,631	232
2031-2036	4,994	250
2036-2041	5,208	260
2041-2046	5,327	266
Total (2022-2046)	26,705	1,335
Medium Density Residential		
2022-2026	4,064	92
2026-2031	2,850	65
2031-2036	3,314	75
2036-2041	3,893	88
2041-2046	4,604	105
Total (2022-2046)	18,726	426
High Density Residential		
2022-2026	3,507	28
2026-2031	2,002	16
2031-2036	2,234	18
2036-2041	2,533	20
2041-2046	2,920	23
Total (2022-2046)	13,196	106
Grand Total	58,626	1,866

Table 7. Greenfield Residential Demand and Land Requirements (2022-2046)

These numbers represent an increase of 6,048 LDR units, 4,346 MDR units and 3,105 HDR units relative to the endorsed Reference Growth Scenario. Therefore, an additional 244 hectares of greenfield land is required to accommodate the projected residential growth based on the land needs assumptions. The land comprises 120 hectares for LDR, 99 hectares for MDR and 25 hectares for HDR.

2.5 Residential Greenfield Supply

This section of the report provides a summary of the supply of land within the Greenfield Area to accommodate forecasted demand. The starting point for determining the Greenfield supply is the lands available within the residential Vacant Land Inventory (VLI), prepared as of March 31, 2024.

A summary of this residential inventory, based on the status of the land (registered plan, draft approved plan, designated residential, urban reserve community growth), has been provided below (see Table 8). It should be noted that the residential VLI identifies lands for potential residential development with the Urban Growth Boundary (i.e. it contains lands within the Built Area and Greenfield Area).

Category	LDR Units	MDR Units	HDR Units	Total Units
Registered Subdivision, Condominium and Reference Plans	1,427	2,076	1,151	4,654
Draft Approved Subdivision and Condominium Plans	1,698	4,011	2,224	7,933
Draft Subdivision and Condominiums Plans Under Review	1,395	4,964	1,942	8,301
Site Plans	0	2,874	2,858	5,732
Potential Development	147	723	1,096	1,967
Official Plan Designations	12,794	6,221	30,546	49,561
Total	17,461	20,869	39,816	78,147

Table 8. Adjusted Residential Vacant Land Inventory as of March 31, 2024

2.6 Greenfield Residential Lands Analysis

Future residential land needs were determined by evaluating the ability of Greenfield lands to accommodate projected demand for residential land over the planning horizon. The total supply of residential minus the projected residential demand yields a total supply of 19,521 Greenfield units remaining at the end of the 25-year planning period (2046).

Table 9 shows available land supply broken down by structure type. There will be sufficient land at the end of the planning period to accommodate approximately 2,144 MDR units and 26,621 HDR units whereas there will be a shortage of land available to accommodate the projected LDR development during the planning period.

	Greenfield Unit Supply	Greenfield Unit Demand	Greenfield Units remaining at 2046	Greenfield Land (ha) remaining at 2046
LDR	17,461	26,705	-9,244	-462
MDR	20,869	18,726	2,144	49
HDR	39,816	13,196	26,621	213

Table 9. Residential Greenfield Land Needs (Supply minus Demand) (2022-2046)

There is a surplus of 49 hectares of lands for MDR units and 213 hectares of lands for HDR units but a deficit of 462 hectares of lands to accommodate LDR units..

3 NON-RESIDENTIAL DEMAND AND SUPPLY

The unprecedented magnitude of the COVID-19 pandemic was understandably not predicted nor accounted for within original growth assumptions included in *The London Plan*. The pandemic was a significant disruptive force which resulted in a dramatic shift in operational processes, work stoppages, and job losses. The Reference Growth Scenario endorsed by Council in 2022 considered the impacts of the pandemic. Through the 2021-2051 growth projections, City Staff have been able to incorporate post-pandemic data trends into refined estimates for the future growth planning – most notably the strong recovery following the pandemic.

As of 2021, the largest employment sector in the City of London was healthcare and social assistance (16%), followed by retail trade (11%), educational services (10%), and manufacturing (8%) – the remainder is divided amongst sectors with smaller shares. Under the Reference Growth Scenario, the City of London’s commercial and institutional employment base was projected to increase from 127,000 jobs in 2021 to 202,200 jobs by 2046 at an average annual rate of roughly 2.0%. This represents an increase of approximately 75,200 jobs between 2021 and 2046.

As previously noted, the Ministry of Finance growth forecast is representative of more optimistic growth scenario compared to previous population growth forecasting and as such, the employment base is anticipated to grow at a significantly higher rate. Under the Ministry of Finance population forecast, there is a projected increase from 129,582 jobs in 2022 (noting that the dataset does not include 2021) to 224,463 jobs by 2046 at an average annual rate of roughly 2.7%. This represents an increase of approximately 94,882 jobs between 2022 and 2046. Compared to the Reference Growth Scenario, the growth forecast based on Ministry of Finance data anticipates sustained growth through the 25-year planning horizon instead of a growth projection which tapers off in the latter portions of the horizon.

3.1 Commercial Growth Forecasts

As noted, the growth forecast for the commercial sector represents a combined calculation of future office and retail needs. The sector was significantly impacted by the COVID-19 pandemic due to the introduction of work-from-home mandates and social distancing direction issued by public health authorities. The London Census Metropolitan Area (CMA) unemployment rates peaked at 10.9% in July 2020 due to the COVID-19 pandemic. During this timeframe roughly 11,040 employment losses were recorded within the commercial sector. Following the gradual reduction of pandemic-related restrictions, unemployment rates declined to 4.8% in April 2022. Despite upheaval within the sector, job losses are expected to be recovered through the 2021-2026 timeframe (noted in Table 10), and the long-term forecast anticipates significant demands related to population growth.

The commercial sector is undergoing a notable transition which has resulted in lower space requirements compared to historical floor space needs. Retail spaces within urbanized environments have been significantly impacted by the expansion of e-commerce and the resultant change in consumer habits. There has been a marked decrease in retail footprints in response to mixed-use development trends and intensification targets. Market demand is expected to continue its shift to smaller retail spaces. Similarly, office space requirements have also seen a steady decline over the last decade largely due to rising real estate costs and the advent of remote/hybrid work arrangements. The COVID-19 pandemic accelerated the change in work habits and office usage, but a lower FSW is projected to persist in the long-term.

5-Year Period	Employment Growth	COVID-19 Job Loss Recovery	Annual Growth
2022-2026	14,191 (25,231) *	11,040	8.9%
2026-2031	7,951	-	1.7%
2031-2036	8,499	-	1.6%
2036-2041	8,673	-	1.5%
2041-2046	9,198	-	1.5%
Total (2022-2046)	59,534	-	3.0%

Table 10. Commercial Growth Forecasts (2022-2046)

* Inclusive of employment loss recovery

3.2 Institutional Growth Forecasts

The institutional sector is expected to account for 26% of the employment growth share noting that healthcare and social assistance (16%), and educational services (10%) are two of the largest employment sources of within the City of London. The institutional sector anticipates strong growth over the 25-year planning horizon and is projected to grow from roughly 58,567 to 93,915 total employees. Employment growth and the annual growth rate are noted in Table 11. It should be noted that GFA creation within the institutional sector does not traditionally follow a linear annual growth and large-scale projects will often lag behind

population-based demands due to external funding mechanisms and decision-making processes.

Institutional land uses and space requirements vary depending on the type of use (e.g. post-secondary institutional vs community centre). This was accounted for within the land calculations and FAR values have been applied based on street classifications in The London Plan. The City of London’s population growth will fuel demand that will require further expansion of education facilities (elementary, secondary, and post-secondary), community and social service hubs, and expanded investment in local and regional healthcare facilities.

5-Year Period	Employment Growth	Annual Growth
2022-2026	11,291	4.8%
2026-2031	5,724	1.6%
2031-2036	5,897	1.6%
2036-2041	6,054	1.5%
2041-2046	6,381	1.5%
Total (2022-2046)	35,348	2.2%

Table 11. Institutional Growth Forecasts (2022-2046)

3.4 Commercial and Institutional Greenfield Demand

The commercial sector is projected to experience strong GFA demands to service population growth. The sector is projecting an average of 66,702m² of development annually over the 25-year planning horizon. This growth rate is expected to result in approximately 1,667,544m² of new GFA to be developed over the 25-year forecast. Despite this strong growth, it is expected that only 13% of commercial demand will be accommodated through standalone commercial whereas the remaining balance will be incorporated into mixed-use development. It is anticipated that 72 hectares of commercial land will be required, with 40 hectares of greenfield land required when factoring in the assumed 45% intensification rate and the 13% share for standalone commercial demand.

Over the 25-year planning horizon, the institutional sector is projecting GFA growth with an average of 91,951m² of development annually. This growth rate is expected to result in approximately 2,298,764m² of new GFA to be developed over the 25-year forecast. It is anticipated that 547 hectares of institutional land will be required, with 99 hectares of greenfield land required when factoring in the assumed 82% intensification rate. Table 12 summarizes the assumptions related to GFA calculations for commercial and institutional land use. Table 13 summarizes the demands for the commercial and institutional sectors.

	Floor Space per Worker Assumption	Floor Area Ratio (FAR) Assumption	GFA Required (m ²)
Commercial	34m ² (370ft ²)	0.30	1,667,544m ²
Institutional	65m ² (700ft ²)	0.42	2,298,764m ²

Table 12. Commercial and Institutional GFA calculations (2022-2046)

	Total Land Required (m²)	Total Land Required (ha)	Greenfield Required (ha)
Commercial (total)	5,558,479	556	-
Commercial (standalone)	722,602	72	40
Institutional	5,473,248	547	99

Table 13. Commercial and Institutional Greenfield Demand

3.5 Commercial and Institutional Land Supply

This section of the report provides a summary of the supply of land within the Greenfield Area to accommodate forecasted commercial and institutional demand. The commercial and institutional inventory was categorized by land status (registered plan, draft approved plan, designated residential, urban reserve community growth) and has been provided below (see Table 14). It should be noted that the non-residential VLI identified lands for potential development within the UGB and included both land within the BAB and Greenfield Area.

The VLI land supply calculation included standalone and mixed-use commercial land use based on The London Plan place type designations. This includes commercial uses in Commercial Industrial Place Type but does not consider other industrial place types.

Category	Commercial (ha)	Institutional (ha)	Total (ha)
Registered Subdivision, Condominium and Reference Plans	2	10	12
Draft Approved Subdivision and Condominium Plans	4	1	5
Draft Subdivision and Condominiums Plans Under Review	7	7	14
Site Plans	21	3	24
Potential Development	15	9	24
Official Plan Designations	53	147	200
Total	102	177	279

Table 14. Non-Residential Vacant Land Inventory as of March 31, 2024

3.6 Greenfield Non-Residential Lands Analysis

Future commercial and institutional land needs were determined by evaluating greenfield land supply and the capacity to accommodate projected demand over the 25-year planning horizon. The current greenfield supply for commercial was calculated at 58 hectares of lands whereas institutional land supply was calculated at 137 hectares.

Table 15 identifies the available land supply categorized by city-wide and specific to the greenfield area. Based on the results of this study, there is land available within the greenfield area to accommodate the approximate demand of 40 hectares of standalone commercial noting that the majority of the commercial demand will be accommodated through mixed-use development, and 99 hectares of institutional development. There will be surplus land supply for both commercial and institutional land uses at the end of the planning horizon (2046).

	City-Wide Supply (ha)	Greenfield Supply (ha)	Greenfield Demand (ha)	Greenfield Land (ha) remaining at 2046
Commercial	102	58	40	18
Institutional	177	137	99	38

Table 15. Commercial and Institutional Greenfield Land Needs

Based on these findings, there is no demonstrated need for further expansion to the Urban Growth Boundary to accommodate growth on commercial or institutional land over the 25-year planning horizon.

4 CONCLUSIONS

Based on the assumptions and methodology, there is a need for approximately 1,866 hectares of greenfield residential lands and 139 hectares of greenfield lands for non-residential commercial and institutional uses over the 25-year planning horizon under The London Plan.

There will be a deficit of 200 hectares of lands to accommodate the projected residential growth in the City of London. Although the City has a sufficient supply of MDR and HDR lands (49 hectares and 213 hectares, respectively) at the end of 2046, there is a deficit of 462 hectares of land available for low density residential development. This demonstrates that there is an identified need for expansion of the City's Urban Growth Boundary to accommodate residential growth by 2046.

At the end of 2046, there will be a surplus of 18 hectares of land for commercial growth and 38 hectares of land for institutional growth. Therefore, there is no identified need for further expansion to accommodate commercial and institutional lands by 2046.

Appendix C – Draft Evaluation Criteria for Expansion Areas

1. Parcel shapes, size, configuration, topography, and potential for planned urban uses.
2. Logical and financially viable servicing of new parcels or areas.
3. Logical extension of an existing neighbourhood and/or will be large enough area to accommodate a complete new neighbourhood (Future Community Growth).
4. Existing and planned infrastructure will be optimized: a logical integration with master servicing strategies.
5. Meets the Province's Minimum Distance Separation requirements (for separation between existing livestock operations and new sensitive land uses).
6. Impact on agricultural operations will be minimized, including directing expansions to lower classes of prime agricultural land categories to the extent possible.
7. Protection of components of the Natural Heritage System and built heritage.
8. Addressing market demands by location of housing, commercial and/or industrial uses that are not well met by the available land supply.

Note: forthcoming Industrial Land Needs Assessment may identify separate evaluation criteria specific to Industrial land uses, if required.

Appendix D – List of Requests for Expansion Areas

Below is a list of sites requested for evaluation for potential inclusion within an Urban Growth Boundary expansion.

- Colonel Talbot and Pack Road Properties (3231, 3293 and 3323 Colonel Talbot Road and 7184, 7220 and 7290 Pack Road)
- 1944 Bradley Avenue
- 1996 Bradley Avenue
- 3950 Dundas Street (Thames Centre, Middlesex County)
- 1620 Fanshawe Park Road East
- 4423 Highbury Avenue South
- 3681 Homewood Lane
- 2425 Old Victoria Road
- 1426 Sunningdale Road
- 2700 Trafalgar Road
- 1431 Sunningdale Road West

Appendix E – Industrial Land Conversion Evaluation

Evaluated Sites

- 1) 2496 Dundas Street
- 2) 2550 Dundas Street
- 3) 3317 White Oak Road

Criteria	1	2	3
Landowner interest in conversion to an alternative Place Type	✓	✓	✓
Property not within Prime Industrial Land locations, as referenced in the ILDS, or other municipal/economic development initiatives	✓	✓	✓
Property not required for long-term use as Industrial Lands	✓	✓	X
Would not preclude continued operation of existing industrial uses	✓	X	X
Minimum Separation Distances are to be evaluated and no concerns identified	✓	✓	X
Suitability/affordability of municipal servicing without significant constraints	(*)	(*)	✓
Parcel size and/or potential suitability for land assembly	✓	✓	✓
Property does not demonstrate significant environmental constraint for reuse as another land use/Place Type (i.e. natural heritage system features, natural hazards, or significant brownfield contamination)	X	X	✓
Adequate street frontage for non-industrial use	✓	✓	✓
No major easements/corridors impeding development for non-industrial use	✓	✓	✓
Property has sufficient depth/area to meet guidelines for development of sensitive uses in adjacency to railway operations (i.e. 2013 Federation of Canadian Municipalities/Railway Association of Canada guidelines)	✓	✓	✓
Sufficient setback from pipelines to ensure safety for non-industrial use	✓	✓	✓
Sufficient setback from airport operations to address airport noise exposure forecast (NEF) for non-industrial use	✓	X	✓
Presence of other non-Industrial uses adjacent to the property or within the same area of the Industrial Place Type	✓	✓	X
Property demonstrates potential for long-term use as a non-Industrial Place Type	✓	X	X

(*) Engineering Division indicated that fulsome servicing review and considerations would be required prior to development application.