

Report to Planning and Environment Committee

To: Chair and Members
Planning and Environment Committee

From: Scott Mathers, MPA, P.Eng.
Deputy City Manager, Housing and Community Growth

Subject: Auburn Developments
845-875 Commissioners Road East
File Number: Z-25141, Ward 14
Public Participation Meeting

Date: April 14, 2026

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of Auburn Developments relating to the property located at 845-875 Commissioners Road East:

- (a) The proposed by-law attached hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting April 28, 2026 to amend Zoning By-law No. Z.-1, in conformity with the Official Plan, The London Plan, to change the zoning of the subject property **FROM** a Restricted Service Commercial (RSC1/RSC3/RSC4) Zone, a Light Industrial (LI1) Zone and Open Space (OS5) Zone **TO** a Holding Residential R10 Special Provision (h-1*h-5*h-8*R10-4(_)) Zone, a Holding Residential R10 Special Provision (h-1*h-5*h-8*h-193*R10-4(_)) Zone, and an Open Space (OS5) Zone;
- (b) The Site Plan Approval Authority **BE REQUESTED** to consider the following design issues through the site plan process:
- i) A private easement and joint use maintenance agreement be entered into to access the municipal sanitary sewer;
 - ii) Building entrances are to be oriented towards the public street with pedestrian connections to Commissioners Road East;
 - iii) Consideration of a maximum floor plate of 1000m² above the 8th storey to mitigate shadowing and provide a slender tower portion;
 - iv) The recommendations and mitigation measures from the Air Quality Assessment be included in the Development Agreement; and
 - v) Engage with Realty Services to facilitate a land transfer to acquire the Environmentally Significant Area in exchange for the unopened municipal right-of-way.

IT BEING NOTED, that the above noted amendment is being recommended for the following reasons:

- i) The recommended amendment is consistent with the *Provincial Planning Statement, 2024*;
- ii) The recommended amendment conforms to The London Plan, including but not limited to the Key Directions, Neighbourhoods Place Type, and the Our Tools policies; and
- iii) The recommended amendment would permit an appropriate form of development at a scale and intensity that is appropriate for the site and surrounding context.

Executive Summary

Summary of Request

The applicant has requested an amendment to the Zoning By-law Z.-1 to rezone the property from a Restricted Service Commercial (RSC1/RSC3/RSC4) Zone, Light

Industrial (LI1) Zone and Open Space (OS5) Zone to a Residential R10 Special Provision (R10-4(_)) Zone and Open Space (OS5) Zone with special provisions to implement the proposed development.

Purpose and the Effect of Recommended Action

Staff are recommending approval of the requested Zoning By-law amendment with special provisions to implement the proposed development and holding provisions to ensure necessary updates to the EIS and compensation strategy, access to the municipal sewer and a methane gas study be completed through a future Site Plan application. The recommended action will permit four (4) 14-storey (50 metre) apartment buildings with a total of **868 residential units** and a maximum density of 275 units per hectare.

Linkage to the Corporate Strategic Plan

This recommendation will contribute to the advancement of Municipal Council's 2023-2027 Strategic Plan in the following ways:

- **Housing and Homelessness**, by ensuring London's growth and development is well-planned and considers use, intensity and form.
- **Wellbeing and Safety**, by promoting neighbourhood planning and design that creates safe, accessible, diverse, walkable, healthy, and connected communities.
- **Housing and Homelessness**, by supporting faster/ streamlined approvals and increasing the supply of housing with a focus on achieving intensification targets.

Analysis

1.0 Background Information

1.1 Previous Reports Related to this Matter

39T-86006 – 845 and 865 Commissioners Road East

1.2 Planning History

The subject lands are part of an existing industrial Draft Plan of Subdivision (39T-86006) which applies to the lands at 845 and 865 Commissioners Road East. The conditions of draft approval were issued in 1986, and revisions were issued in 1991. The draft Plan of Subdivision is still an active file and has no lapse date.

The subject lands were part of a site-specific appeal to the Local Planning Appeal Tribunal (now the Ontario Land Tribunal) against the City of London's adoption of the new Official Plan, The London Plan. Through a settlement, the Neighbourhoods Place Type (with the High Density Residential overlay) was applied to the front portion of the site, and the Open Space Place Type applied to the rear. The appeal further settled the boundary of the Environmentally Significant Area (ESA), agreed to by both parties and provided three (3) segments reflecting variations in the approach to be taken with development applications on the subject lands adjacent to the ESA boundary.

1.3 Property Description and Location

The subject lands, municipally known as 845-875 Commissioners Road East, are located on the south side of Commissioners Road East, between Wellington Road to the west and Adelaide Street South to the east, in the Westminster Planning District. The subject lands are mostly undeveloped aside from an existing vacant building at 865 Commissioners Road East. The subject lands are partially vegetated and contain a Provincially Significant Wetland (PSW) and an ESA. The subject lands contain an unopened municipal right-of-way through the centre of the subject lands, terminating in a cul-de-sac.

Surrounding land uses include Victoria Hospital infrastructure and Parkwood Institute to the west, high-density residential to the north in the form of apartment buildings, an ESA and CN Railway to the east, and Westminster Ponds and associated open space to the south. Access to the subject lands is proposed from two (2) access points off Commissioners Road East, in line with other accesses on the opposite side of Commissioners Road East.

Site Statistics:

- Current Land Use: Vacant with one (1) existing building
- Frontage: 275 metres (902 feet)
- Area: 6.88 hectares (17.0 acres)
- Shape: Regular (rectangle)
- Located within the Built Area Boundary: Yes
- Located within the Primary Transit Area: Yes

Surrounding Land Uses:

- North: High-density residential development
- East: Environmentally Significant Area and CN Rail
- South: Westminster Ponds
- West: Victoria Hospital infrastructure and Parkwood Institute

Existing Planning Information:

- The London Plan Place Type: Neighbourhoods and Green Space Place Type fronting a Civic Boulevard (Commissioners Road East)
- The London Plan: High Density Residential Overlay
- Existing Zoning: Restricted Service Commercial (RSC1/RSC3/RSC4) Zone, a Light Industrial (LI1) Zone and Open Space (OS5) Zone



Figure 1 Aerial Photo of 845-875 Commissioners Road East and surrounding lands.



Figure 2 Streetview of 845-875 Commissioners Road East (view looking south)

2.0 Discussion and Considerations

2.1 Development Proposal

The applicant is proposing four (4) 14-storey apartment buildings containing a total of 868 residential units, with a maximum height of 50 metres and density of 275 units per hectare. The development is proposed to be completed in three (3) phases. Phase 1 includes two 14-storey, 208-unit towers (Buildings “A” and “B”) connected by a 2-storey podium and 127 surface parking spaces. Phase 1 is located at the northwest corner of the subject lands with Building “A” fronting Commissioners Road East. Phase 2 includes, a 14-storey, 218-unit apartment building (Building “C”), associated surface parking, and a 3-storey parking structure containing 519 parking spaces in the southwest corner to service all three (3) towers. Phase 3 includes a 14-storey, 206-unit apartment building (Building “D”) and a 2-storey parking structure containing 268 parking spaces.

The remainder of the lands are proposed to be retained for the existing ecological buffers and associated Environmentally Significant Area.

The proposed development includes the following features:

- Land use: Residential
- Form: Apartment buildings
- Height: 14-storeys (50 metres)
- Residential units: 868
- Density: 275 units per hectare
- Building coverage: 43%
- Parking spaces: 933 total structured and surface (1.07 per unit)
- Bicycle parking spaces: 894 long-term (1.02 per unit) / 87 short-term (0.1 per unit)
- Landscape open space: 34%

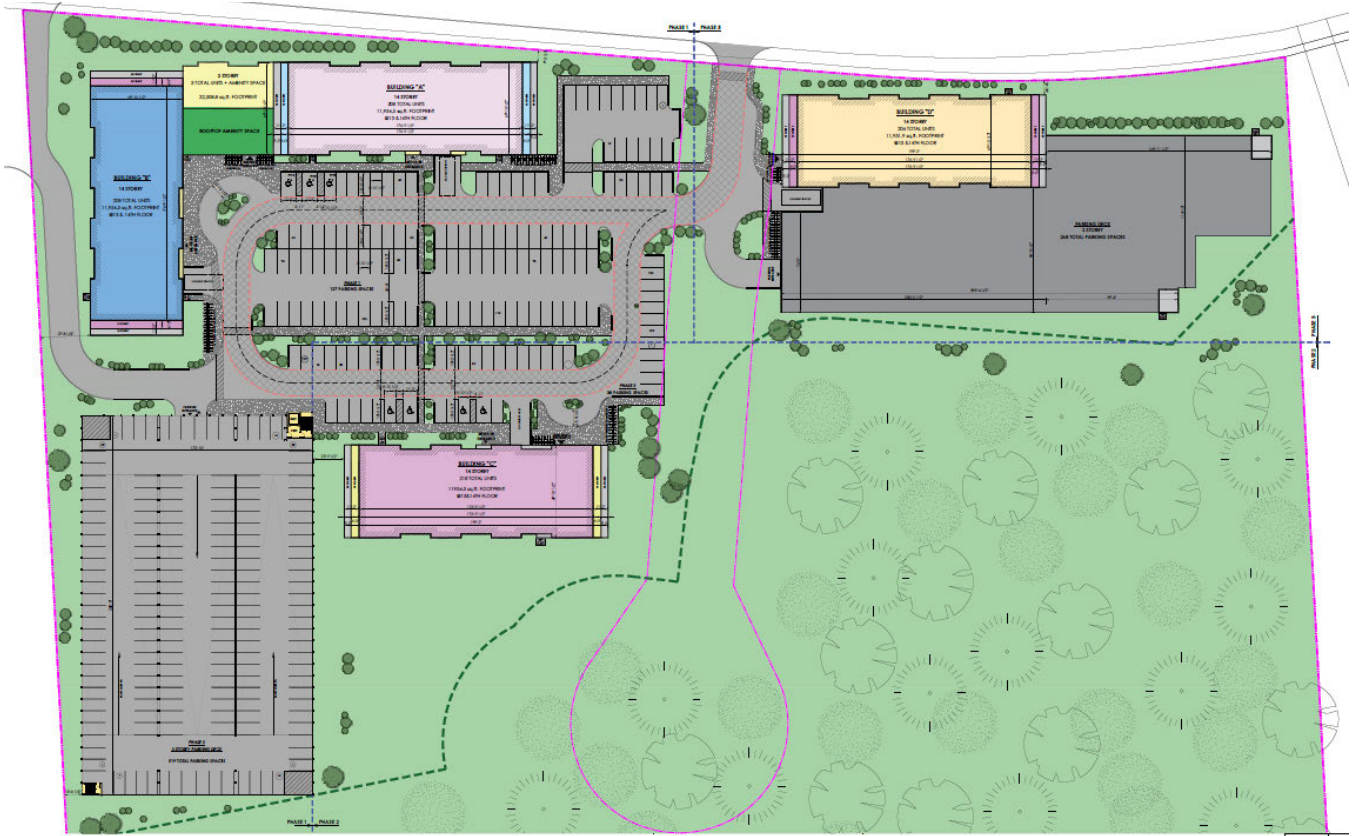


Figure 3 Conceptual Site Plan (November 2025)



Figure 4 Concept Rendering – View facing northwest (November 2025)



Figure 5 Concept Rendering – View facing southeast (November 2025)

Additional plans and drawings of the development proposal are provided in Appendix “B”.

2.2 Requested Amendment

The applicant has requested an amendment to the Zoning By-law No. Z.-1 to rezone the property to a Residential R10 Special Provision (R10-4(_)) Zone and an Open Space (OS5) Zone with special provisions to implement the proposed development.

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

R10-4(_) Zone	Required	Proposed	Recommended
Front Yard Depth (minimum)	13.0 metres	2.0 metres	3.0 metres
Rear Yard Depth (minimum)	20.0 metres	1.0 metres to the OS5 Zone boundary line	3.0 metres
Interior Side Yard Depth (minimum)	20.0 metres	3.0 metres	4.0 metres
Height (maximum)	N/A	Lesser of 50m or 14-storeys	As proposed
Indoor Amenity Space at Rooftop Level	Included in height calculation	Excluded from height calculation	As required (included in height calculation)
Step-back Above the 3 rd storey (minimum)	N/A	N/A	1.5 metres along Commissioners Road East

2.3 Internal and Agency Comments

The application and [associated materials](#) were circulated for internal comments and public agencies to review. Comments received were considered in the review of this application and are addressed in Section 4.0 of this report.

Key issues identified by staff and agencies included:

- Access to the municipal sanitary sewer requires an Application for Consent to establish an easement.
- The lands are within the Regulatory Limits of the landfill methane influence area and the closed landfill impact zone.

- The submitted EIS is insufficient to deem acceptable and requires additional information.

Detailed internal and agency comments are included in Appendix “C” of this report.

2.4 Public Engagement

On November 10, 2025, Notice of Application was sent to 204 property owners and residents in the surrounding area. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on November 20, 2025. A “Planning Application” sign was also placed on the site.

On March 6, 2026, Notice of Public Meeting was sent to 204 property owners and residents in the surrounding area. Notice of Public Meeting was also published on the *Public Notices Webpage* on the City’s website on March 26, 2026.

Seventeen (17) responses and one petition containing 55 signatures, on file at the Clerk’s office, were received during the public consultation period. Comments received were considered in the review of this application and are addressed in Section 4.0 of this report.

Concerns expressed by the public relate to:

- Traffic
- Ecological impacts
- Impacts on average market rents
- Infrastructure

Detailed public comments are included in Appendix “D” of this report.

2.5 Policy Context

The Planning Act and the Provincial Planning Statement, 2024

The Provincial planning policy framework is established through the *Planning Act* (Section 3) and the *Provincial Planning Statement, 2024 (PPS)*. The *Planning Act* requires that all municipal land use decisions affecting planning matters shall be consistent with the *PPS*.

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

As the application for a Zoning By-law amendment complies with The London Plan, it is staff’s opinion that the application is consistent with the *Planning Act* and the *PPS*.

The London Plan, 2016

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

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

Staff are of the opinion that all the above criteria have been satisfied.

3.0 Financial Impact/Considerations

The subject lands contain an unopened municipal right-of-way that are owned by the City of London but were never dedicated as public highway. Through the subsequent Site Plan application, a land swap is proposed by the applicant to obtain the right-of-way in exchange for the ESA lands. Details regarding the extent of lands dedicated to the City will be determined through the subsequent Site Plan process.

4.0 Key Issues and Considerations

4.1 Land Use

The subject lands are in the Neighbourhoods Place Type and Green Space Place Type, fronting a Civic Boulevard in accordance with Map 1 – Place Types and Map 3 – Street Classifications in The London Plan. The Neighbourhoods Place Type contemplates a range of residential uses, dependent upon the street classification on which the property has frontage. As set out in Table 10, the range of permitted uses along a Civic Boulevard include stacked townhouses, apartments, emergency care establishments, rooming houses and supervised correctional residences (TLP Table 10 – Range of Permitted Uses in the Neighbourhoods Place Type).

The proposed residential use aligns with the vision of the Neighbourhoods Place Type by contributing to a diversity and mix of different housing types, intensities and forms (TLP 918_2). The proposed residential use aligns with Key Direction #5 – Building a mixed-use compact city, by planning for infill and intensification of various types and forms to take advantage of existing services and facilities to reduce our need to grow outward (TLP 59_4) and to ensure a mix of housing types within our neighbourhoods so that they are complete and support aging in place (TLP 59_5). On this basis, staff are satisfied the proposed apartment use is in conformity with the policies of The London Plan.

D-6 Land Use Compatibility Assessment

A D-6 Land Use Compatibility Assessment was prepared by EXP Services Inc. (February 2026) and submitted to assess the compatibility of the proposed development with surrounding land uses. Three (3) facilities were identified for further assessment; Victoria Hospital Heating Plant at 825 Commissioners Road; Canadian Linen and Uniform at 155 Adelaide Street South; and APEX Fabrication & Supply at 160 Adelaide Street South. The Victoria Hospital Heating Plant, which directly abuts the subject lands to the west, is classified as a Class I industry requiring a minimum separation distance of 20 metres. The heating plant is located inside the minimum distance separation and inside the area of influence as defined in the D-6 Guidelines. Canadian Linen and Uniform is classified as a Class II industry and APEX Fabrication and Supply is classified as a Class I industry. Both are located outside of the minimum separation distance and area of influence.

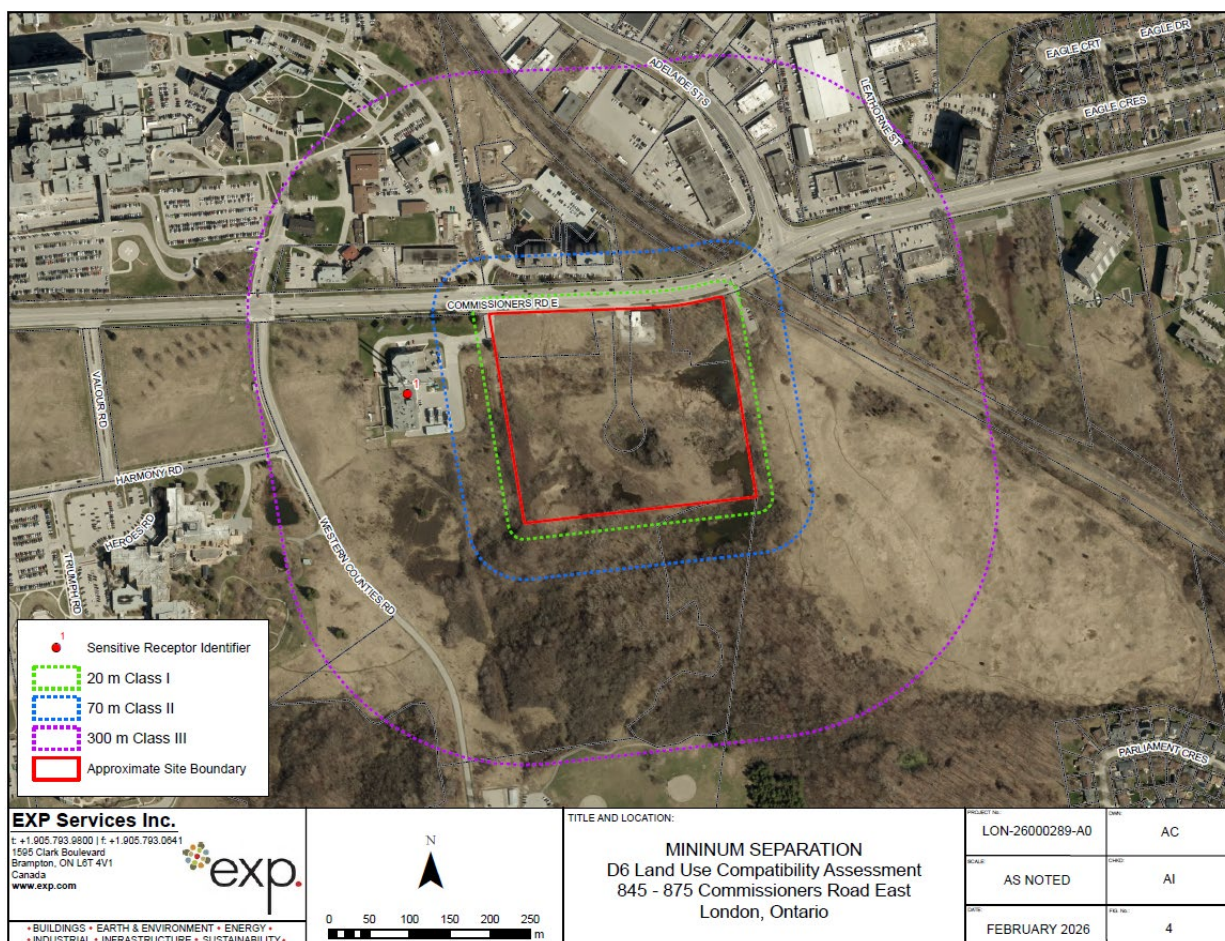


Figure 6 D-6 Land Use Compatibility Minimum Separation Distance

The Air Quality Assessment evaluated the Victoria Hospital Heating Plant which is registered on the Environmental Activity and Sector Registry (EASR) on the Ontario database. As such, it is required to operate and be maintained in accordance with the Environmental Protection Act (EPA). Based on current emissions regulated under the EPA, the assessment found that potential air quality impacts on the proposed development can be managed for compatibility within the regulatory EASR framework or building best ventilation and design practices.

The D-6 Land Use Compatibility Assessment considered the potential impact of surrounding facilities to be low. Through the Site Plan Approval application, a Noise Study will also be submitted, reviewed and the recommendations implemented to mitigate any impacts on the proposed development.

4.2 Intensity

In the Neighbourhoods Place Type, Table 11 provides for a range of permitted heights based on street classification. Where a site has frontage on a Civic Boulevard in the Primary Transit Area, a minimum height of 2 storeys and a maximum height of 8 storeys is contemplated (Table 11 – Range of Permitted Heights in the Neighbourhoods Place Type).

The subject lands are identified on Map 2 – High Density Residential Overlay (From 1989 Official Plan). The London Plan recognizes High Density Residential areas that were designated in the previous Official Plan whereby Map 2 is an overlay that permits high-rise apartment buildings, in addition to the policies of the underlying Urban Place Types identified in Map 1 (TLP 955_). Notwithstanding the height and intensity policies of the underlying place type, inside the Primary Transit Area, residential development may be permitted up to 14 storeys in height within the HDR overlay (TLP 958_1). The proposed high-rise apartment building is a permitted use, in conformity with the HDR Overlay policies of The London Plan and is appropriate for the subject lands.

The London Plan contemplates residential intensification for properties in the Neighbourhoods Place Type including infill development (TLP 939_5). The policies seek to ensure that proposals for intensification respect existing neighbourhood character

while being appropriately located to fit well within their neighbourhood (TLP 918_13, 940_). The proposed residential intensity will facilitate an appropriate form and scale of development that is compatible within the existing and future neighbourhood context. The subject lands are of sufficient size and shape to support the use and intensity while ensuring the height is compatible with and fits within the existing and planned neighbourhood context (TLP 953_).

On this basis, staff are satisfied the proposed 14 storey building height is in conformity with the policies of The London Plan.

4.3 Form

It is the intent of The London Plan to plan for neighbourhoods with a diversity and mix of built forms that avoids the broad segregation of different housing types, intensities, and form (TLP 918_2). Thus, residential intensification is fundamentally important to achieve this vision and key directions of The London Plan but will respect existing neighbourhood contexts and offer a level of certainty, while providing strategic ways to realize our vision for aging in place, diversity of built form, affordability, vibrancy, and the effective use of land in neighbourhoods (TLP 497_).

Pursuant to Policy 953_, the following urban design considerations apply to the Neighbourhoods Place Type and are relevant to this application. Compatibility and fit, from a form perspective, will be evaluated based on factors such as:

- Site layout within the context of the surrounding neighbourhood, considering such things as access points, driveways, landscaping, amenity areas, building location, and parking.
- Building and main entrance orientation.
- Building line and setback from the street.
- Character and features of the neighbourhood.
- Height transitions with adjacent development.
- Massing appropriate to the scale of the surrounding neighbourhood.

The proposed form is generally consistent with the Neighbourhoods Place Type policies and the City Design policies of The London Plan. These policies direct all planning and development to foster a well-designed built form, and ensure development is designed to be a good fit and compatible within its context (TLP 193_1 & 193_2). The site layout of new development should be designed to respond to its context, the existing and planned character of the surrounding area, and to minimize and mitigate impacts on adjacent properties (TLP 252_ & 253_). Buildings should be sited close to the street to maintain and reinforce the prevailing street wall and create an inviting and comfortable pedestrian environment (TLP 254_ and 259_). To reduce the visual impact of parking, parking for large buildings, such as high-rise residential buildings should be located underground, or integrated within the building design (TLP 275_).

The London Plan directs high rise buildings to be designed to express three (3) defined components: a base, middle, and top (TLP 289_):

1. The base should establish a human-scale façade with active frontages including, where appropriate, windows with transparent glass, forecourts, patios, awnings, lighting, and the use of materials that reinforce a human scale.
2. The middle should be visually cohesive with, but distinct from, the base and top.
3. The top should provide a finishing treatment, such as roof or a cornice treatment, to hide and integrate mechanical penthouses into the overall building design.

The proposed development consists of four (4) 14-storey residential apartment buildings with a maximum height of 50.0 metres for all buildings. Three (3) of the proposed apartment buildings are oriented towards Commissioners Road East with setbacks to define the street edge and allow for inviting, active, and a comfortable pedestrian environment (TLP 259_). The fourth building is located towards the rear of the site with sufficient setbacks from the abutting Open Space (OS5) Zone. Buildings “A” and “B” are proposed to be connected by a 2-storey podium in the northwest corner of the site,

while Buildings “C” and “D” are to be constructed as stand-alone 14-storey towers. To break up the massing and define the “top”, the applicant is proposing a step back above the 10th storey with a second step back above the 12th storey for floors 12-14 for all buildings. To provide a comfortable environment for pedestrians, a step back above the 3rd storey of 1.5 metres is being recommended by staff as outlined in Section 4.4 of this report. The staff recommended step back will help define the base and establish an appropriate human-scale along Commissioners Road East.

Specifically, the following site layout and building design features are recommended and should be carried forward through special provisions and direction to the Site Plan Approval Authority in the future development of the subject lands:

- A minimum front yard setback of 3.0m from the ultimate road widening to ensure the proposed built form is street-oriented and respond to planned character of the surrounding neighborhood (TLP 252, 256, 259).
- Orient the built forms to the public street (Commissioners Road East) with front facades and principal entrances fronting the public street (TLP 291).
- A minimum ground floor height of 4.0m to give prominence to the base of all buildings fronting Commissioners Road East, to provide additional opportunities for increased glazing to activate the street and provide passive surveillance (TLP 289_1, 291).
- Provide a high degree of transparent glazing for the ground floor façades abutting Commissioners Road East to allow visibility, wayfinding and offer passive surveillance (TLP 285, 291).
- A minimum step-back of 1.5m above the 3rd or 4th storey along Commissioners Road East to foster a human-scale and comfortable environment for pedestrians (TLP 268, 287, 292).
- Provide tower portions of the buildings (portion above the 8th storey) to be designed as slender towers with a maximum floor plate size of 1000m² to ensure shadowing and privacy impacts are minimized on adjacent properties and public areas (TLP 293).
- Provide active uses for the podium level such as residential units, amenities, lobby, etc. of the proposed development along Commissioners Road East to further activate the street and offer passive surveillance (TLP 285, 289).
- Provide a minimum separation distance of 25.0m between all "tower" component of the proposed development (TLP 293).
- Prohibit front yard parking to minimize the visual exposure of parking area to the street and create an inviting, active and comfortable pedestrian environment along Commissioners Road East. Parking should be located to the interior and/or rear of the property (TLP 259, 269, 272).
- Design the ground floor for all buildings fronting Commissioners Road East to establish a prominent base with a high degree of transparent glazing that provides enhanced street activation and opportunities for visibility, wayfinding and passive surveillance (TLP 289_1, 291).

On this basis, staff are satisfied the proposed form is appropriate subject to additional special provisions as recommended by staff. All other matters can be sufficiently addressed through the subsequent Site Plan application.

4.4 Zoning

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

Front Yard Depth

The applicant is requesting a reduced front yard depth of 2.0 metres whereas 13.0 metres is the minimum required. Planning and Development staff are recommending a front yard depth of 3.0 metres to provide a built form that is street-oriented and responses to the planned character of the surrounding neighbourhood. Further, the special provision will also allow opportunities for patios and landscaping to extend into

the setback, creating active amenity spaces and a vibrant, engaging streetscape (TLP 259_, 286_, 288_).

Rear Yard Depth

The applicant is requesting a reduced rear yard depth of 1.0 metre to the Open Space (OS5) Zone boundary line whereas 20.0 metres is the minimum required. Planning and Development staff are recommending a minimum rear yard depth of 3.0 metres. The reduced 3.0 metre setback is to the proposed parking structure and will allow for sufficient space for access, maintenance and landscaping abutting the natural heritage features and buffers in the Open Space (OS5) Zone.

Interior Side Yard Depth

The applicant is requesting a reduced interior side yard depth of 3.0 metres whereas 20.0 metres is the minimum required. Planning and Development staff are recommending a minimum interior side yard depth of 4.0 metres to provide adequate setback for landscaping and provide additional buffers between the proposed development and existing natural features.

Height

The applicant is requesting a special provision to permit a maximum building height of 14 storeys or 50 metres, whichever is less. As the subject site is located in the High Density Residential Overlay, staff are of the opinion the proposed maximum building height is appropriate and compatible with the surrounding neighbourhood based on The London Plan policies (TLP 958_). The impacts of additional height have been appropriately mitigated as identified in Section 4.3 above.

Indoor Amenity Space at Rooftop Level

The applicant is requesting a special provision to exempt indoor amenity space from the height calculation whereas rooftop indoor amenity space is included in the permitted height. Planning and Development staff are not supportive of this request. By excluding indoor amenity space at rooftop level from the overall height calculation, the building can be constructed at 14 storeys with additional storeys that include indoor amenity space at the rooftop level. This results in a building being constructed at 15-storeys or greater, exceeding the height permissions of the High Density Residential Overlay and resulting in a building not in conformity with The London Plan policies.

Step back above the 3rd Storey

Staff are recommending a special provision to include a step back above the 3rd storey of 1.5 metres to create a pedestrian-scale along Commissioners Road East, as identified in Section 4.3 in this report.

4.5 Traffic

As part of the complete application, a Transportation Impact Assessment (TIA) was prepared by Paradigm Transportation Solutions (July 2025) to analyze existing traffic conditions along Commissioners Road East, forecast future traffic conditions and assess traffic impacts of the proposed development. Commissioners Road East is a Civic Boulevard, designed to move medium to high volumes of vehicular traffic (TLP 371_5).

The TIA concluded the proposed development can be accommodated by the study area road systems and intersections. The existing access intersections currently operate with significant delays and poor levels of service for outbound site traffic under existing and future background traffic conditions without the proposed development, as well as under future total traffic conditions with the subject development in place. To remediate current delays in the area, the TIA recommended Transportation Demand Management (TDM) measures such as internal sidewalks with connections to the adjacent roadway network, bicycle parking in accordance with the Zoning By-law Z.-1, access to existing and future transit routes on adjacent roadways, and unbundled parking (parking costs are separated from sale or rent of residential unit) as part of the Site Plan approval process.

Based on the submitted TIA and Transportation Planning & Design's review of the proposed development, staff have no concerns with the proposed development and increased traffic.

4.6 Ecology

The subject lands are identified as being within 120 metres of a Provincially Significant Wetland (PSW), an Environmentally Significant Area (ESA), unevaluated wetlands and a Regional Life Science Area of Natural and Scientific Interest (ANSI), per Map 5 – Natural Heritage Features in The London Plan.

As part of a complete application an Environmental Impact Study (EIS) was prepared by MTE Consultants Inc. (September 2025) to analyze the proposed development and site alteration on the subject lands and adjacent lands within 120 metres to evaluate ecological functions and determine negative impacts on natural heritage features or areas as a result of the proposed development. The EIS has identified natural heritage features within or adjacent to this property and has recommended buffers and mitigation measures to avoid direct and indirect impacts on the natural heritage system.

Staff have reviewed the submitted EIS in conjunction with the Local Planning Appeal Tribunal, now the Ontario Land Tribunal (OLT), decision regarding the buffers from the ESA boundary and require additional information in order to accept the submitted EIS. On this basis, a Holding (h-1) Zone is recommended, as outlined in Section 4.7 of this report, to ensure an updated EIS is submitted and accepted as part of a future Site Plan process. It is noted that staff and the applicant have determined the appropriate buffers and associated setbacks to proceed with the current Zoning By-law amendment application.

4.7 Holding Provisions

As outlined in Section 4.0 of this report, staff are supportive of the proposed development and are requesting the following holding provisions be applied:

- h-1 - *Purpose*: To determine the extent to which development will be permitted and ensure that development will not have a negative impact on relevant components of the Natural Heritage System of the Official Plan, an agreement shall be entered into specifying appropriate development conditions and boundaries, based on an Environmental Impact Study or Subject Lands Status Report that has been prepared in accordance with the provisions of the Official Plan and to the satisfaction of the City of London, prior to removal of the "h-1" symbol.
- h-5 - *Purpose*: The "h- 5" symbol shall not be deleted until a methane gas study is completed and mitigation measures are implemented, if required, to the satisfaction of City Engineer.
- h-8 - *Purpose*: To ensure the orderly development of lands and the adequate provision of municipal services, the "h-8" symbol shall not be deleted until appropriate servicing arrangements are provided to the satisfaction of the City
- h-193 - *Purpose*: To ensure the ecological replacement of natural heritage features, the "h-193" symbol shall not be deleted until an Ecological Replacement and Compensation Plan has been reviewed and accepted by the City that demonstrates the replacement of the ecosystem features and functions to be removed in a manner that enhances the Natural Heritage System on at least a one-to-one land area basis and is implemented to the satisfaction of the City.

The recommended holding provisions will facilitate further discussions regarding the compensation strategy and necessary updates to the EIS at Site Plan. Further, the holding provisions requested by Engineering will ensure access to the municipal sewer is obtained and a methane gas study is completed prior to the issuance of Site Plan Approval.

Conclusion

The applicant has requested an amendment to the Zoning By-law Z.-1 to rezone the property from a Restricted Service Commercial (RSC1/RSC3/RSC4) Zone, a Light Industrial (LI1) Zone and Open Space (OS5) Zone to a Residential R10 R10-4() Zone and an Open Space (OS5) Zone. Staff are recommending approval of the requested Zoning By-law amendment with special provisions.

The recommended action is consistent with the PPS 2024, conforms to The London Plan and will facilitate residential intensification at a scale and intensity that is appropriate for the site and surrounding context.

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Manger, Planning Implementation

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

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Appendix A – Zoning By-law Amendment

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

By-law No. Z.-1-

A by-law to amend By-law No. Z.-1 to
rezone an area of land located at 845-
875 Commissioners Road East

WHEREAS this amendment to the Zoning By-law Z.-1 conforms to the Official Plan;

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

1. Schedule "A" to By-law No. Z.-1 is amended by changing the zoning applicable to lands located at 845-875 Commissioners Road East, as shown on the attached map **FROM** a Restricted Service Commercial (RSC1/RSC3/RSC4) Zone, a Light Industrial (LI1) Zone and Open Space (OS5) Zone **TO** a Holding Residential R10 Special Provision (h-1*h-5*h-8*R10-4()) Zone, a Holding Residential R10 Special Provision (h-1*h-5*h-8*h-193*R10-4()) Zone, and an Open Space (OS5) Zone.
2. Section Number 14.4 of the Residential R10 Zone is amended by adding the following Special Provisions:

R10-4() 845-875 Commissioners Road East

- a) Regulations
 - i) Front Yard Depth (minimum) – 3.0 metres
 - ii) Rear Yard Depth (minimum) – 3.0 metres
 - iii) Interior Side Yard Depth (minimum) – 4.0 metres
 - iv) Height (maximum) – 14-storeys or 50.0 metres, whichever is less
 - v) Step Back Above the 3rd storey – 1.5 metres along Commissioners Road East
3. This Amendment shall come into effect in accordance with Section 34 of the *Planning Act, R.S.O. 1990, c. P13*, either upon the date of the passage of this by-law or as otherwise provided by the said section.

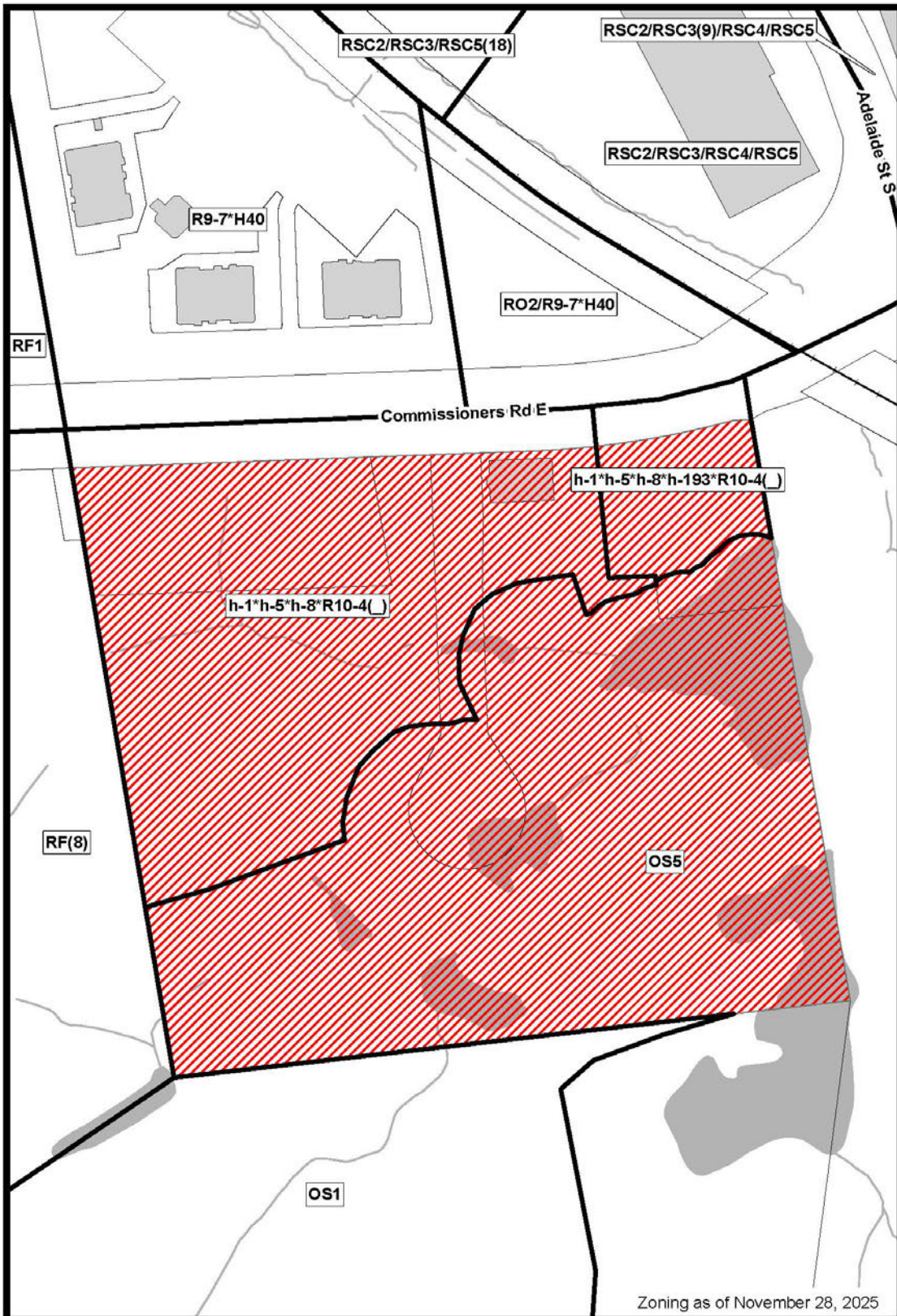
PASSED in Open Council on April 28, 2026 subject to the provisions of PART VI.1 of the *Municipal Act, 2001*.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – April 28, 2026
Second Reading – April 28, 2026
Third Reading – April 28, 2026

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



File Number: Z-25141
Planner: MV
Date Prepared: 2026/02/11
Technician: JI
By-Law No: Z.-1-

SUBJECT SITE 

1:2,000

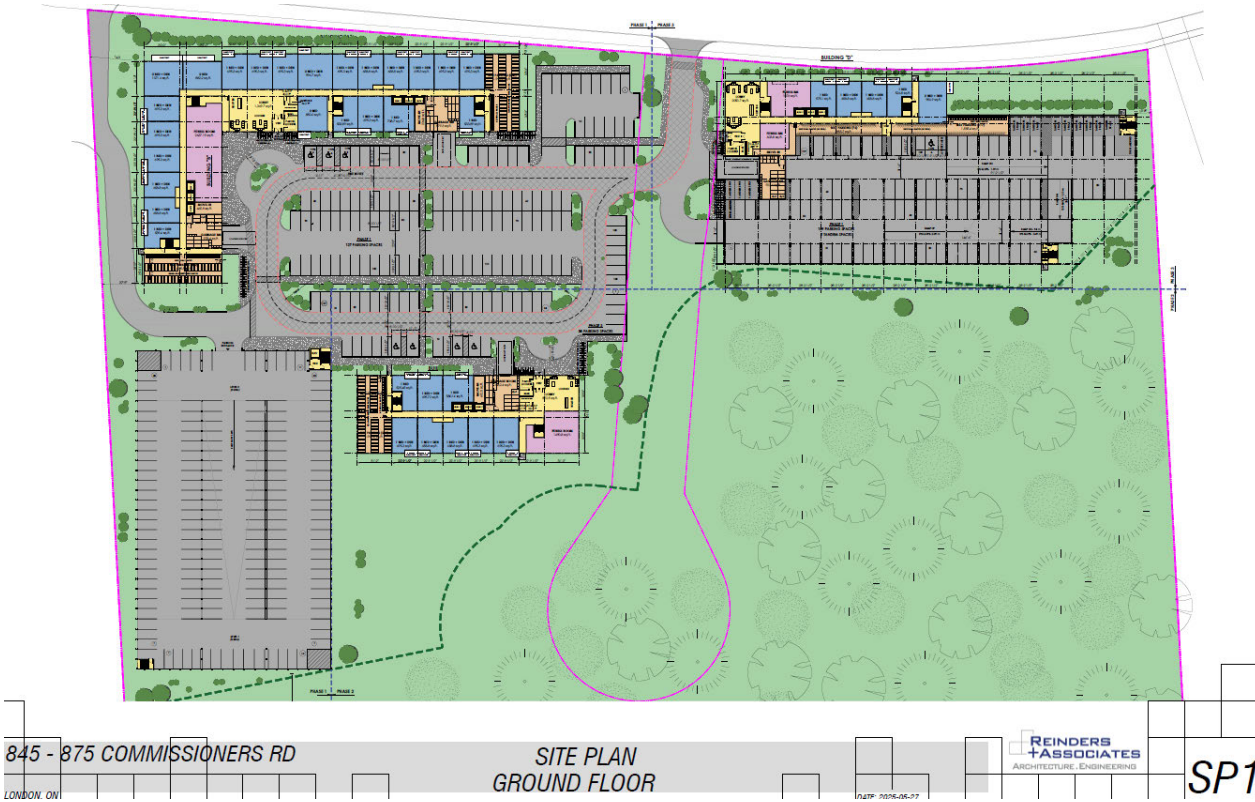
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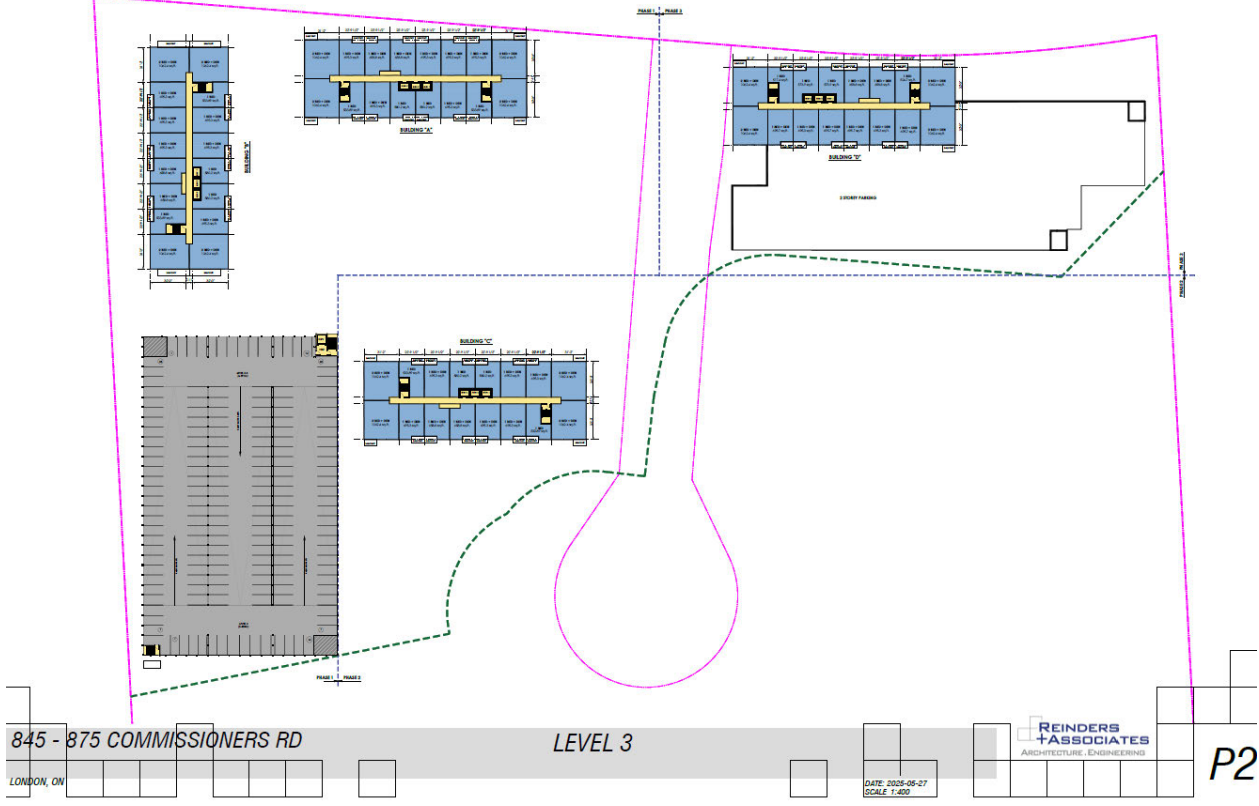
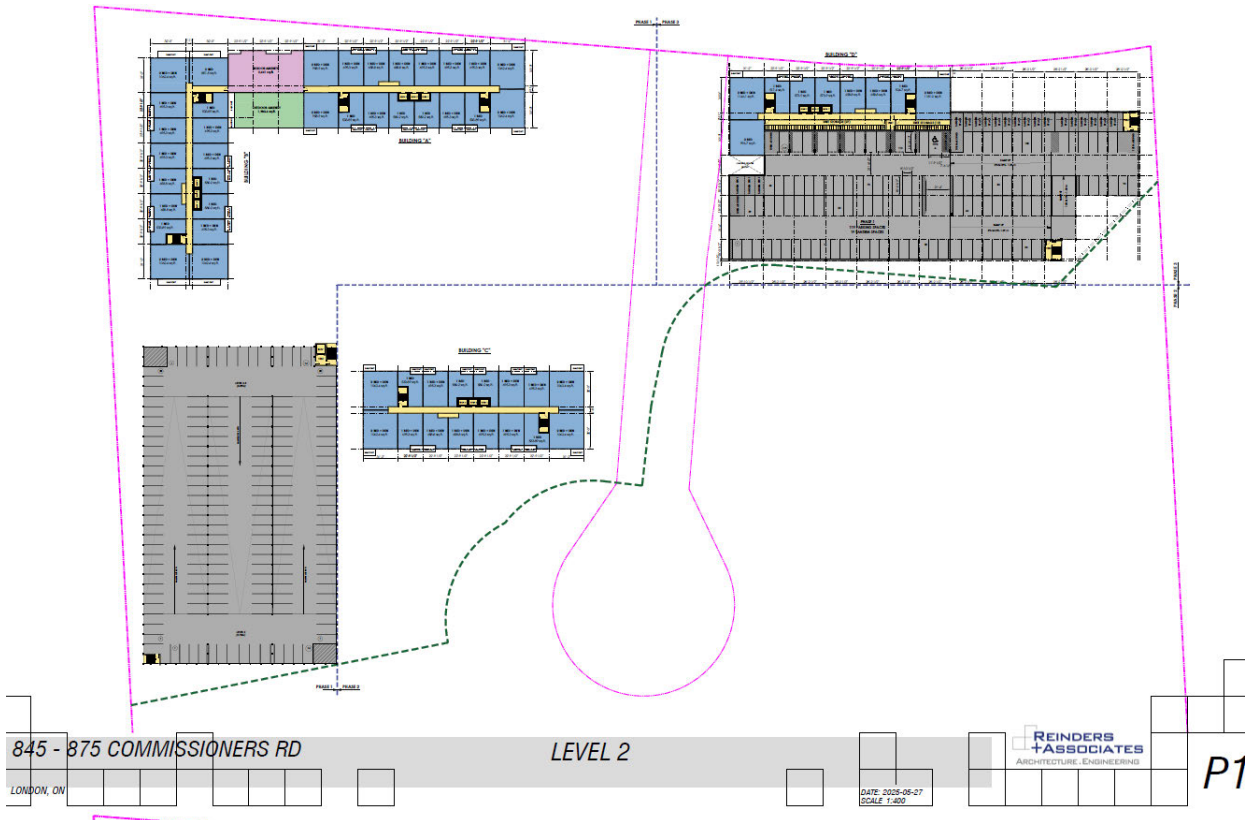


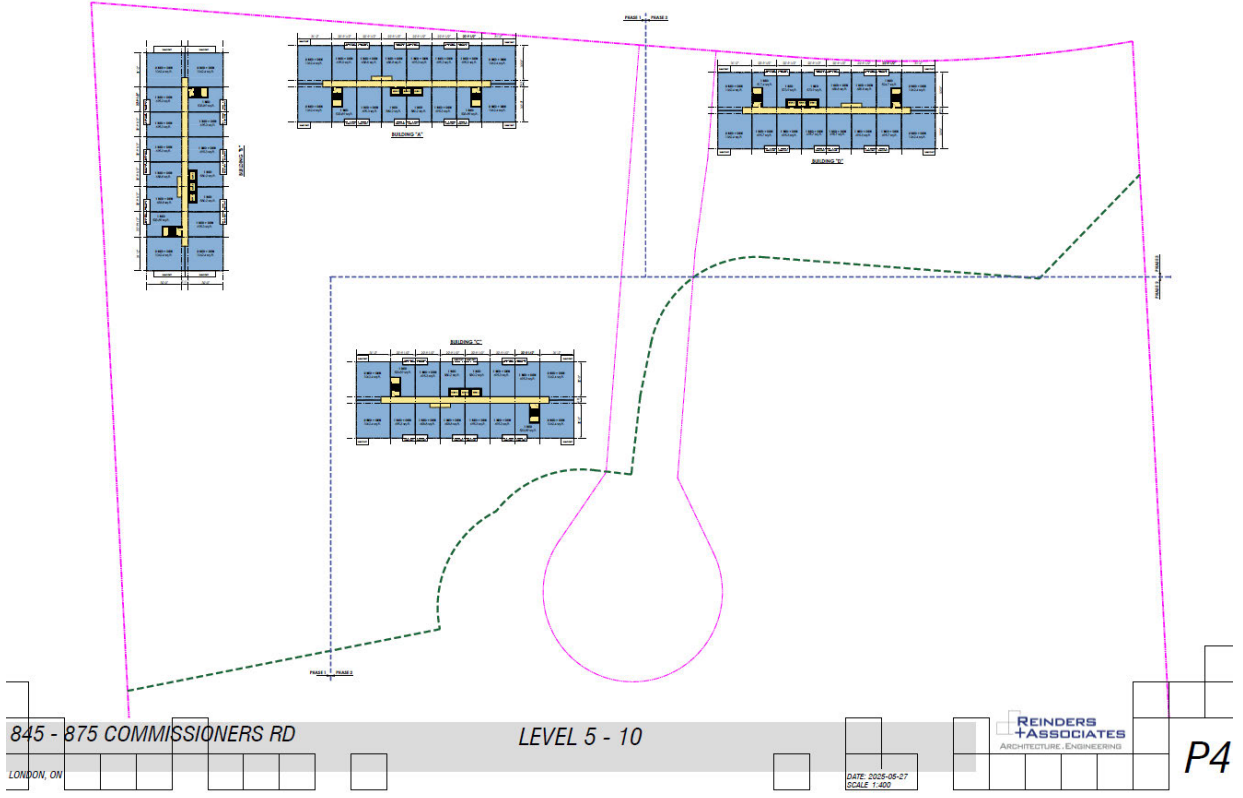
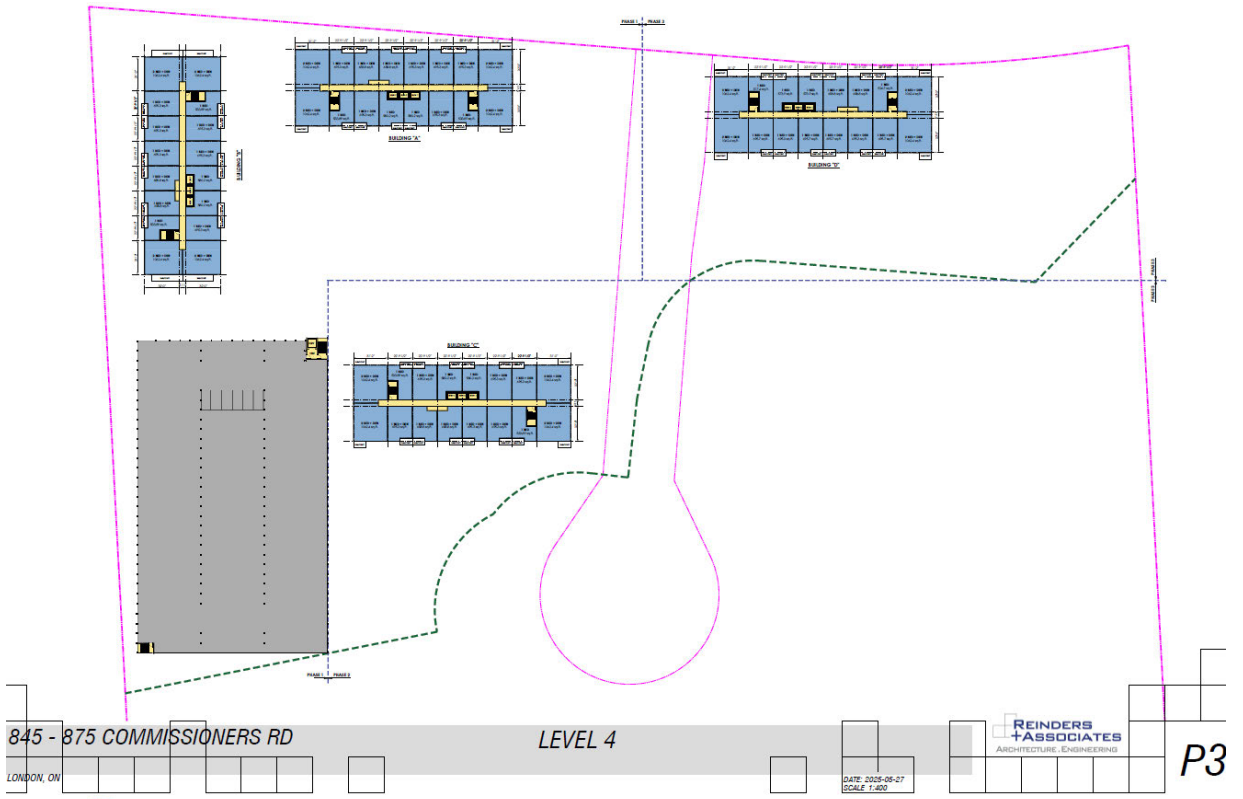
Appendix B – Additional Plans and Drawings

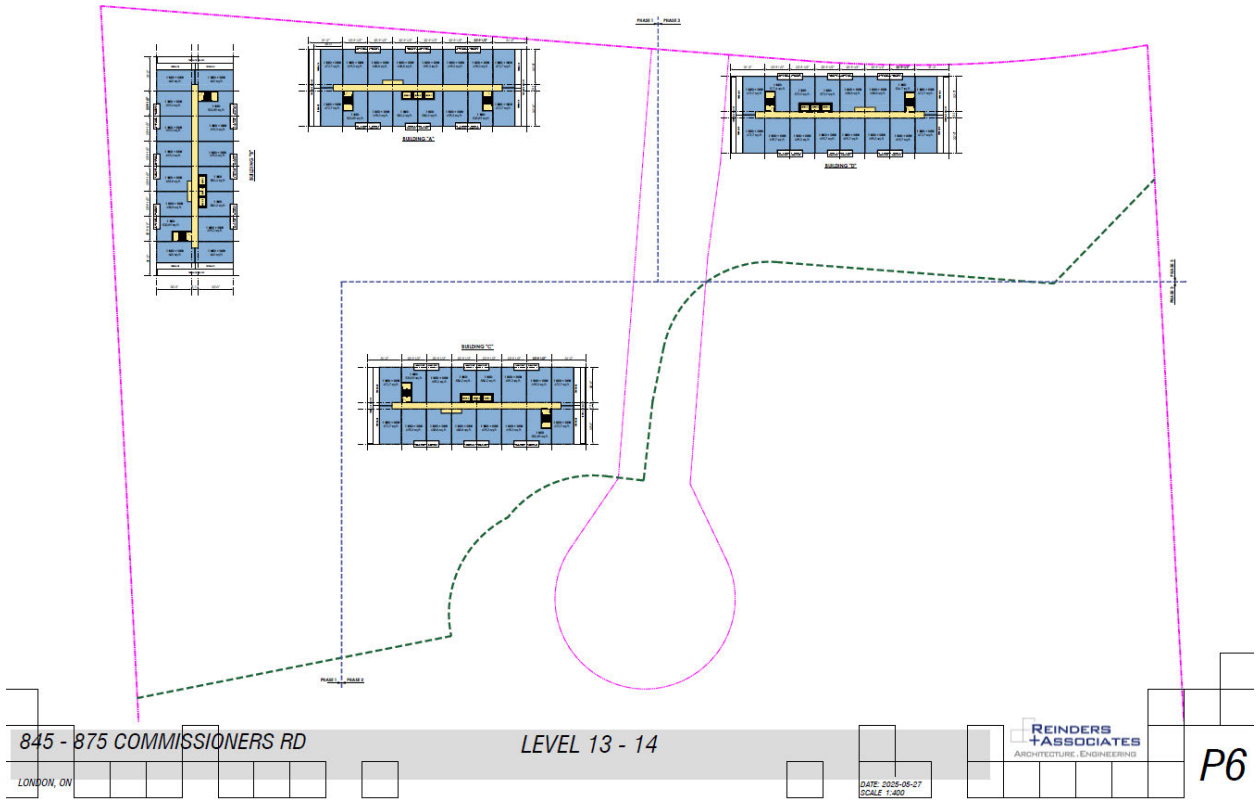
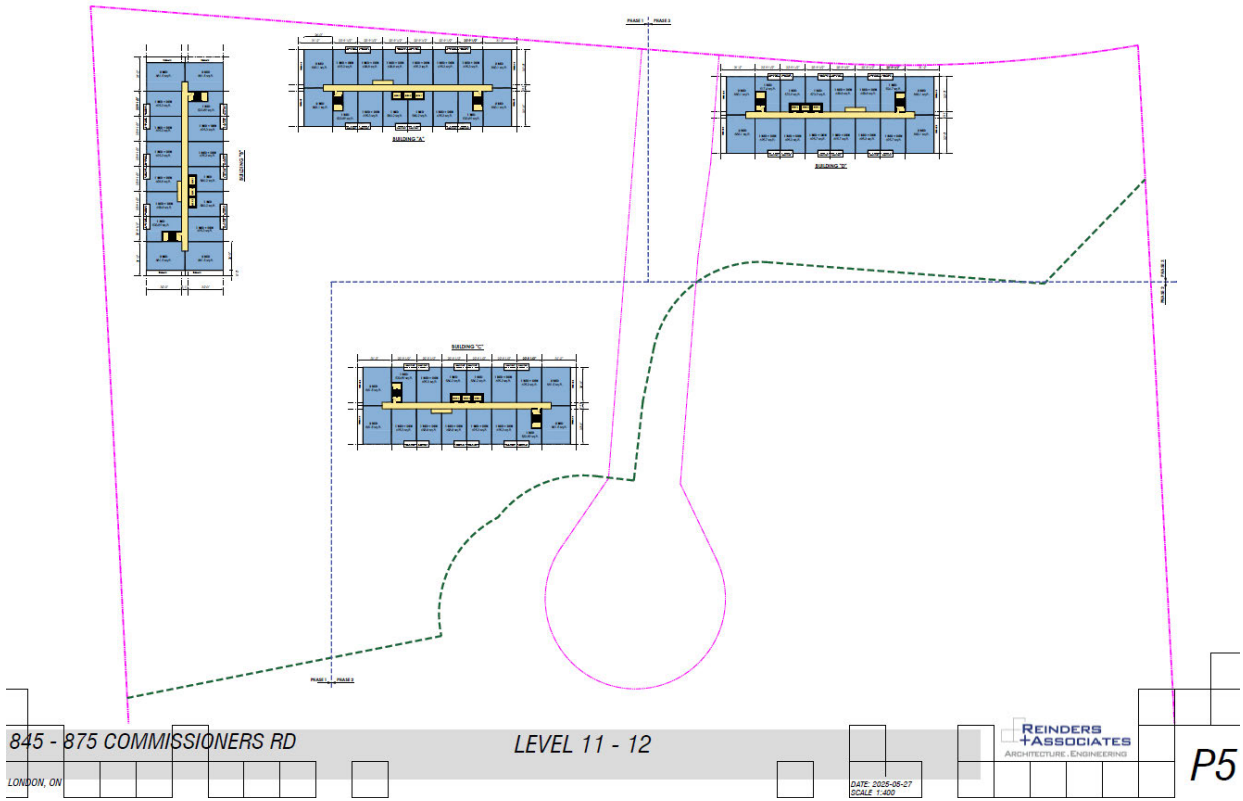


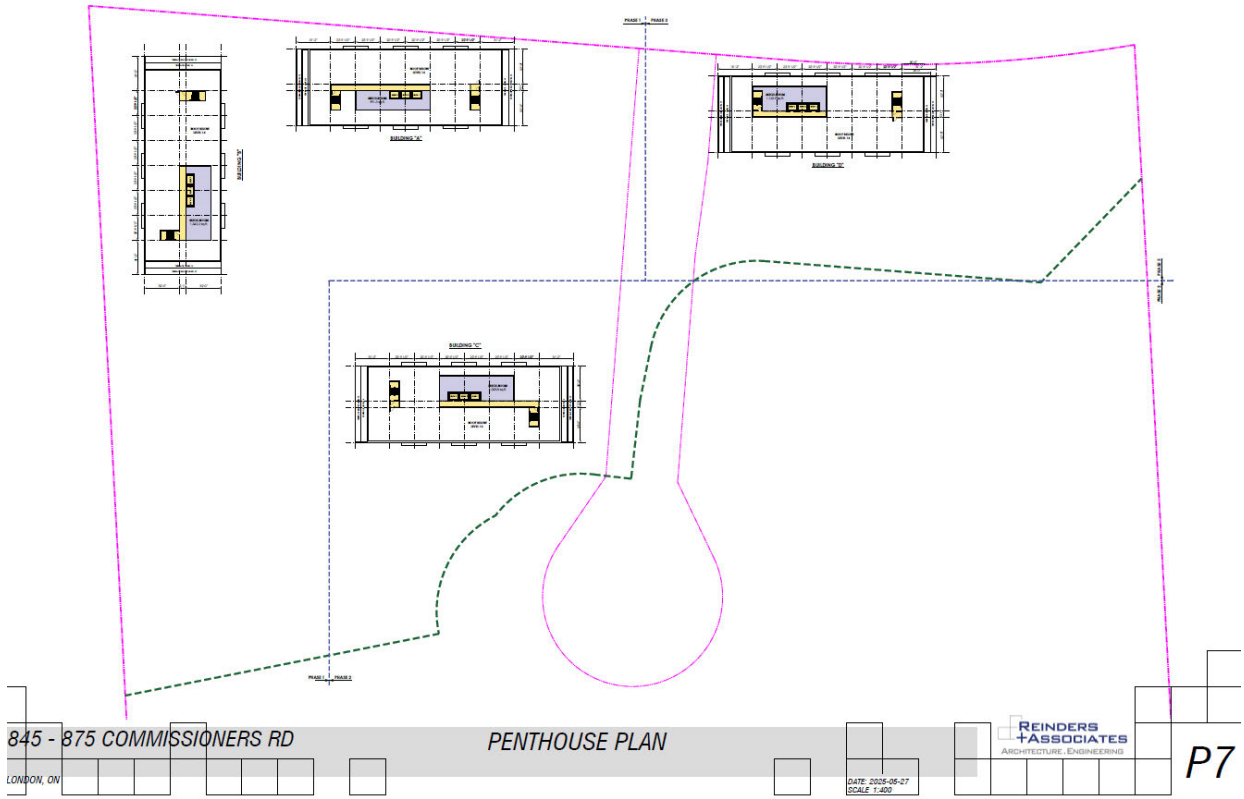












845 - 875 COMMISSIONERS RD

PENTHOUSE PLAN

REINDERS
ASSOCIATES
ARCHITECTURE ENGINEERING

DATE 2025-05-27
SCALE 1:100

P7

Appendix C – Internal and Agency Comments

Planning & Development

- Planning and Development staff are generally supportive of the proposed development. Staff, however, are not supportive of the requested special provision to exclude the indoor amenity space at rooftop level from the height calculation. This is consistent with previous development applications.
- The unopened municipal right-of-way and proposed land swap will be reviewed through the Site Plan Approval process.
- An Application for Consent may be required at the time of Site Plan Approval to enter into a private easement and joint-use and maintenance agreement to access the municipal sanitary sewer.
- As noted in Engineering Comments below, the site is located within regulatory limits of the landfill methane influence area and the closed landfill impact zone. Waste Management comments will be provided upon receipt.
- A revised concept plan is required to address Ecology Comments related to providing adequate buffers to capture the appropriate zoning boundaries and special provisions.

Urban Design

Major Issues:

- The proposed development is located in the Neighbourhoods and Green Space Place Type fronting onto a Civic Boulevard with High Density Residential Overlay where a 14-storey residential development are contemplated in *The London Plan* (TLP). Urban Design is generally supportive of residential intensification on the site. However, current site layout is not supported, as it does not adequately address the public realm and site context. It is recommended that the applicant explore an improved site layout with an increased front yard setback to ensure built form is street-oriented and respects the surrounding context, orienting built forms towards public street, and step-back for the high rise buildings fronting public street as envisioned in *The London Plan*.

Matters for Zoning:

- Urban Design recommends the following Special Provisions be incorporated into the proposed R10-4() Zone to foster a safe, comfortable and accessible public realm, and to reduce potential impacts on neighboring properties:
 - **Provide a minimum front yard setback of 3.0m** from the ultimate road widening to ensure the proposed built form is street-oriented and respond to planned character of the surrounding neighborhood [TLP 252, 256, 259].
 - **Orient the built forms to the public street** (Commissioners Road East) with front facades and principal entrances fronting the public street [TLP 291].
 - **Provide minimum ground floor height of 4.0m** to give prominence to the base of all buildings fronting Commissioners Road East, to provide additional opportunities for increased glazing to activate the street and provide passive surveillance [TLP 289_1, 291].
 - **Provide a high degree of transparent glazing** for the ground floor façades abutting Commissioners Road East to allow visibility, wayfinding and offer passive surveillance [TLP 285, 291].
 - **Provide a minimum step-back of 3.0m above the 3rd or 4th storey along Commissioners Road East** to foster a human-scale and comfortable environment for pedestrians [TLP 268, 287, 292].
 - **Provide tower portions of the buildings (portion above the 8th storey) to be designed as slender towers with a maximum floor plate size of 1000m²** to ensure shadowing and privacy impacts are minimized on adjacent properties and public areas [TLP 293].
 - **Provide active uses for the podium level such as residential units, amenities, lobby, etc.** of the proposed development along Commissioners Road East to further activate the street and offer passive surveillance [TLP 285, 289].

- **Provide a minimum separation distance of 25.0m between all "tower" components** of the proposed development [TLP 293].
- **Prohibit front yard parking** to minimize the visual exposure of parking area to the street and create an inviting, active and comfortable pedestrian environment along Commissioners Road East. Parking should be located to the interior and/or rear of the property [TLP 259, 269, 272].

Direction to Site Plan:

- Orient the built forms to the public street (Commissioners Road East) with front facades and principal entrances fronting the street [TLP 291].
- Design the ground floor for all buildings fronting Commissioners Road East to establish a prominent base with a high degree of transparent glazing that provides enhanced street activation and opportunities for visibility, wayfinding and passive surveillance [TLP 289_1, 291].
- Provide a minimum step-back of in the building design above the 3rd or 4th storey along Commissioners Road East to foster a human-scale and comfortable environment for pedestrians [TLP 268, 287, 292].
- Provide active uses for the podium level such as residential units, amenities, lobby, etc. of the proposed development along Commissioners Road East to further activate the street and offer passive surveillance [TLP 285, 289].
- Design the site to mitigate the visual presence of parking along Commissioners Road East and provide an inviting, active and comfortable pedestrian environment. Parking areas should contribute to an enhanced streetscape character by being visually screened and located away from the primary street edge [TLP 259, 269, 272].

Matters for Site Plan:

Base (Ground Floor) -

- Provide minimum ground floor height to give prominence to the base of all buildings fronting Commissioners Road East, to provide additional opportunities for increased glazing to activate the street and provide passive surveillance [TLP 289_1, 291].
- Provide a high degree of transparent glazing for the ground floor façades abutting Commissioners Road East to allow visibility, wayfinding and offer passive surveillance [TLP 285, 291].
- Orient the buildings fronting to Commissioners Road East by locating the principal unit entrances on the street-facing elevation with direct walkway access to the public sidewalk from the individual building entrances. [TLP 291]
 - Provide direct entrances with lockable 'front doors' from the public sidewalk along the Commissioners Road East for all ground floor units to promote walkability, wayfinding, pedestrian comfort and safety'.
 - Ensure the principal building entrances to the proposed residential buildings are emphasized through signage and other architectural elements with clear distinction for residential access points as a way of wayfinding and accessibility. Include architectural details to distinguish the principal entrance, such as:
 - Double-doors;
 - A high degree of transparent glazing;
 - Weather protection, such as canopies and/or awnings above the building/unit entrances;
 - Other architectural details such as signage, human-scale lighting, landscaping, building articulation, etc.

Podium (2nd floor - 3/4th floor) -

- Provide active uses for the podium level such as residential units, amenities, lobby, etc. of the proposed development along Commissioners Road East to further activate the street and offer passive surveillance [TLP 285, 289].
- Provide a high degree of transparent glazing for podiums of the façades along public street to foster a safe, comfortable and active public realm for Commissioners Road East [TLP 285, 291].

Tower Portion -

- Design tower portions of the buildings (portion above the 7th storey) to achieve slender built form that minimizes shadowing and enhances privacy for adjacent properties and public spaces. [TLP 293].
- Provide a high degree of glazing and architectural detail in the towers and top portions of the buildings to break up the overall massing and add interest to the skyline.
- Ensure the rooftop mechanical equipment are screened from view and integrated into the overall building design [TLP 296].

Site Design -

- Provide a safe and continuous pedestrian circulation throughout the overall property connecting the principal building entrances, parking area and the sidewalk along public street [TLP 255, 268].
- Provide a centrally located and adequately sized common outdoor amenity space [TLP 295].
- Ensure retaining walls, noise walls and non-transparent fencing (i.e., board on board) are not be proposed along the street frontages and the open space block [TLP 230, 241].
- Screen any surface parking or loading areas exposed to a public street with enhanced all-season landscaping, including low landscape walls, shrubs, and trees [TLP 278].
- Locate garbage, loading areas, and associated uses away from any public street frontages and ensure these uses do not detract from or have a negative impact on pedestrian connections [TLP 266].
- Avoid long expanses of blank façades that extends the entire length of building parallel to the public street by including articulation of building walls, use of windows and projections, changes in building material and color to add visual interest to long elevations [TLP 285, 291].
- Include weather protection (canopies or awnings) above the entrances of the proposed buildings to ensure safe and comfortable access for pedestrians.
- Explore opportunities to reduce the amount of gravel/paved area on site to the minimum required for vehicular movement and parking in favour of more landscaped area [TLP 282].
- Incorporate green development initiatives in the design of the site and building, such as white and/or green roofs, etc. [TLP 294].
- Ensure Crime Prevention Through Environmental Design (CPTED) principles are considered in the overall property through site design and circulation (e.g., lighting, transparent glazing, improved sightlines, etc.) to promote pedestrian safety and comfort [TLP 228].
- Provide a full set of dimensioned elevations for all sides of the proposed building(s) as well as a fully dimensioned and labelled site plan. Further comments may follow upon receipt of the drawings.

Parks Planning

Major Issues

- None.
-

Matters for OPA/ZBA

- None.

Matters for Site Plan

- Parkland dedication has not been taken for this proposed residential development. It is to be noted that the applicant, as a condition of site plan approval, the required parkland dedication will be taken in the form of cash-in-lieu pursuant to By-law CP-25.
- The ESA lands are to be acquired by the City through the land transfer required for the applicant to obtain the City owned unassumed road allowance.

Site Plan

Major Issues:

- Staff are not supportive of excluding the indoor amenity space at rooftop level from the height calculation.

Matters for Zoning:

- Special Provisions identified:
 - To permit a front yard depth of 2.0 metres, whereas 13.0 metres is the minimum required.
 - To permit a rear yard depth to the OS5 Zone of 1.0 metres, whereas 20 metres is the minimum required.
 - To permit an interior side yard depth of 3.0 metres, whereas 20 metres is the minimum required.
 - To permit an exterior side yard depth of 2.0 metres, whereas 13.0 metres is the minimum required.
 - To permit a maximum height lesser of 50.0 metres or 14 storeys.

Matters for Site Plan

- Provide a full set of dimensioned elevations, a detailed site plan, landscape plan, rooftop plan, parking deck plans, and floor plans (Site Plan Control By-law, Section 1.5.).
- Provide a Site Plan that includes the dimensions of all the parking spaces, driving aisles, driving access, landscaped areas and sidewalks in metric. (Site Plan Control By-law, Section 1.5.)
- Specify the waste pickup & storage location. Clarify how waste collection will be handled on site (Site Plan Control By-Law, Section 10).
- Specify the snow storage location on the site plan. Ensure that the proposed snow storage location(s) do not impact any existing/proposed landscaping (Site Plan Control By-law, Section 1.5.p.).
- Specify the location of any proposed freestanding light posts and lighting fixtures (Site Plan Control By-law, Section 8.).
- Provide an outdoor amenity area at grade for subject site users (ex. benches, picnic tables, shade structures).
- Ensure a minimum of 1.5 metres is provided along all property boundaries where parking is provided for screening and tree planting purposes (Site Plan Control By-law, Section 9).
- Identify the location of the required accessible parking spots. Show the location and design of the accessible parking signage on the site plan. (Site Plan Control By-law, Figure 7.1.)
- Provide turning radii for truck movements and turnaround on the subject lands. Ensure trucks can maneuver on site and there is no reversing onto the public street. (Site Plan Control By-law, Section 6.2.i.).
- Dimension the proposed paratransit lay-by to ensure that it complies with the Site Plan Control By-law (Site Plan Control By-law, Section 6.8.1.).
- Provide fire route signage and details on the site plan, with signage being provided on both sides of the drive aisle at a maximum distance of 30 metres between signs (Site Plan Control By-law, Table 6.3).
- Provide dimensions of all encroachments (balconies, terraces & canopies) as part of the site plan application to confirm compliance with the Zoning By-law (Zoning By-law, Section 4.27).
- For apartment buildings over 40 units, EV parking stalls are required at a rate of 5% of the provided parking (Zoning By-law, Section 4.19.16).
- Identify the locations of long-term and short-term bicycle stalls on the subject lands (Zoning By-law, Section 4.19.14).
- A Noise Study is required to be provided and reviewed during the Site Plan Approval process.

Engineering

The City of London's Environmental and Engineering Services Department offers the following comments with respect to the aforementioned application:

Planning & Development

- The site is located within Regulatory limits of the landfill methane influence area and the closed landfill impact zone. Waste Management comments will be provided upon receipt.
- Water Engineering requires the Holding Provision "h-8" to be applied to the site to ensure the orderly development of lands and the adequate provision of municipal services. The holding provision shall remain until the lands (845 – 875 Commissioners Road East) have been consolidated to a single parcel to ensure site servicing adheres to City Standard and that the proposal does not create a regulated drinking water system.
- A Noise and vibration Study is required through the Site Plan Approval process.

Matters for Site Plan

Wastewater

- The Municipal sanitary outlet is to the 450mm sanitary sewer crossing Commissioners Road East just west of the site.
- The sanitary report done by MTE dated August 20, 2025 for the site stated that there is capacity in the Municipal 450mm sanitary sewer identified above for the proposed new development of Four (4) 14-storey apartment buildings (868 units x 1.6) = 1389 population
- Access to the municipal 450mm sanitary sewer is through a private sanitary maintenance hole number OS894 which is on lands west of 845 Commissioners Road east which is privately Owned by Victoria Hospital. The Applicant will need a private easement and or joint use and maintenance agreement to access this sanitary maintenance hole for construction and access purposes.
- Sewer Engineering has no objection to this rezoning.

Water

- Water Engineering requires the holding provision "h-8" to be applied to the site to ensure the orderly development of lands and the adequate provision of municipal services. The holding provision shall remain until the lands (845 – 875 Commissioners Road East) have been consolidated to a single parcel to ensure site servicing adheres to City Standard and that the proposal does not create a regulated drinking water system.

Stormwater

- As per the submitted hydrogeological assessment report by EXP (Sept 26, 2025), the Consultant is to identify if the proposed development is appropriate for the subject site due to the high groundwater table. The Consultant is to provide discussion and support from a geotechnical report regarding constructability, functionality and long-term implication of high ground water to any proposed underground structure such as footings, SWM detention chambers, basements, etc.
- As per section 6.9 of the DSRM, Permanent Private Stormwater Systems (PPS) are a mandatory part of a regional stormwater servicing strategy for all Medium and High Density Residential, Institutional, Commercial and Industrial (ICI) site plan developments. A standalone Operation and Maintenance manual document for the proposed SWM system is to be included as part of the system design and submitted to the City for review. This application falls under PPS case #3a.
- As part of a complete development application, the owner will be required to have a professional engineer submit to and have approved by the City Engineer the design of a PPS system, including a Storm/Drainage Servicing report and drawings which should include calculations, recommendations, and details to

demonstrate compliance with the below identified SWM criteria and environmental targets:

- The Consultant shall provide a storm pdc in accordance with Drainage bylaw (WM-4) and DSRM requirements. SWED cannot confirm a storm pdc exists to service the property.
- As per drawing 11071.tif, the site is partially tributary to the 300mm storm sewer on Commissioners Road East toward Adelaide Street (at C=0.25); and partially tributary to 375mm storm sewer toward Dayus SWMF (at C=0.25). Due to grading and limited capacity at Dayus SWMF, SWED recommends connection to the fronting 300mm storm sewer on Commissioners Road East.
- The flows from a site being developed are to be restricted to those flows which were allowed for the site in the design of the receiving storm sewer.
- Site grading is to safely convey up to the major storm event (100-year event flows factored by 1.3, ref. 2024 DSRM 6.2.3), including control of external drainage areas.
- Proposed development peak flows in exceedance of the approved C-value of the downstream storm sewer design shall be managed by onsite SWM control design including, but not limited to, bioswales, infiltration galleries/systems, storage volume calculations, flow restrictor sizing, etc. It is suggested that primarily “clean” roof runoff be directed to infiltration features.
- The major flows are to be controlled on site up to the 100-year event and the site grading is to safely convey up to the major storm event (130% of the 100-year event, 2024 DSRM 6.2.3), including control of external drainage areas.
- As per DSRM 6.2.1, all discharges to the Thames River and major tributaries will be required to meet a Normal (70% TSS removal) water quality standards.
- A Stormwater Management checklist for Site Plan shall be signed and submitted with the initial application. Please refer to DSRM Section 6.1.5 & 6.12.
- As the number of proposed surface parking spaces exceeds 29, the Owner shall be required to have a consulting Professional Engineer confirming how the water quality will be addressed to the standards of the Ministry of the Environment, Conservation and Parks (MECP) with a minimum of 70% TSS removal to the satisfaction of the City Engineer. Applicable options are outlined in the Stormwater Design Specifications & Requirements Manual.
- The Owner agrees to promote the implementation of SWM Best Management Practices (BMP's) within the plan to the satisfaction of the City Engineer, including, but not limited to, decreasing impervious areas and water balance mitigation. Additionally, as part of climate change resiliency objectives the Consultant is to use best efforts to maximize the provided site storage, and is encouraged to consider options, such as but not limited to, optimized grading for ponding areas, roof flow control drains, and orifice controls.
- Grading and Disposal of Storm, Surface and Wastewater shall be in accordance with Section 12 of the Site Plan Control By-Law (SPCB).
- The Owner shall ensure that increased and accelerated Stormwater runoff from this site shall not cause damage to downstream lands, properties or structures beyond the limits of this site (e.g. the Dayus Creek).
- Storm sewers on private property are regulated by the Ontario Building Code (OBC). Where there are no specific regulations in the OBC, applicable design guidance from Chapter 5 & 6 of the City of London, 2024 Design Specifications and Requirements Manual (DSRM) shall apply.
- An E&SC for the subject site shall be prepared by the owner's consultant as part of a complete site plan application. The plan is to include measures to be used during all phases of construction, should identify all erosion and sediment control measures for the subject site, and be in accordance with City of London and MECP standards and requirements. These measures are to also be identified in the Storm/Drainage Servicing Report. For further information on the requirements of the E&SC Plan, please refer to DSRM Section 10.

Hydrogeology

- Exp Services Inc., Hydrogeological Assessment, Final Report – 845, 865, 875 Commissioners Road East (Ross Lands), London, Ontario. September 26, 2025.

- Although a detailed review of the hydrogeological assessment report is deferred to the site plan application (SPA) stage, the following comments should be reviewed and considered by the applicant and their consultant and part of any future submissions to the City of London.
- It is noted in Section 1.2, “At the Client’s request, a scoping meeting with the City of London and the UTRCA has not been completed”. While it is acknowledged that development limits have been established through a decision of the Ontario Land Tribunal (OLT), that decision does not eliminate the requirement to have the applicant and their consultant conduct a scoping meeting with City of London staff to address technical requirements of a complete hydrogeological assessment. As part of a complete SPA application, a short scoping meeting between the applicant’s consultant and the City of London will be required.
- City staff have noted that the Site lies within, and adjacent to, a historical closed landfill area and evidence of methane gas in the area has been documented. Further, infrastructure associated with a historical closed landfill area is present in proximity to the Site. The applicant will be required to assess potential for unacceptable impacts related to the presence of the historical and whether methane mitigation measures are required such as passive or active methane venting or monitoring.
- Based on the City of London’s interpretation of Ontario Regulation 153/04, the change in land use proposed by for the Site from industrial/commercial to residential would require the filing of a Record of Site Conditions (RSC) with the Ministry of Environment, Conservation and Parks (MECP). This requirement is alluded to in Section 1.4, however status of the RSC is not addressed. Please provide approximate timing of filing of the RSC, and impacts on development approval(s).
- There is no water balance assessment presented in the report, and the City has not received any water balance assessment calculations as part of this submission. Please include a detailed and complete feature-based water balance assessment as part of any future submission to the City. Please note, any post-development enhanced infiltration and mitigation measure will also need to be considered in the final water balance assessment. Details and objectives of the water balance assessment can be discussed with City of London staff during the scoping meeting.
- Further to the comment above, if Low Impact Development (LID) measures are proposed for the site, these must be described in detail, including location, size, type, depth, cross section, groundwater separation, etc. Further, infiltration testing results from LID footprint(s) must be undertaken and considered in the overall LID design.
- Based on the development concept provided in Appendix B, all parking structures appear to be raised structures and underground parking is not being contemplated for the Site. Please provide confirmation that the City’s interpretation on the parking structures is correct.
- There is currently no information related to construction dewatering contained in the report. Please note, the City would require a preliminary dewatering assessment as part of future submission to the City, including identification of any potential dewatering discharge locations. Further, any formal construction dewatering assessments to support EASR registration will need to be provided to the City. Finally, if any City of London infrastructure is proposed as a dewatering discharge location, written approval from City Staff will be required, regardless of any permits required to support construction dewatering.

Transportation

TIA

- Section 2.1 – Western Counties Road south of Commissioners Rd is listed as a 40km/h road in our data. Report to be updated to reflect.
- Section 5 - The Transportation Master Plan: smart moves, January 2013 is outdated and no longer the appropriate reference. The current goal is to reach 32.5% mode share targets by 2050 as per the Mobility Master Plan, July 2025.
- Appendices & synchro files to be provided.

Conceptual Plan

- Waste collection vehicle turn around movements and swept path analysis shall be provided.
- Any site plan dimensions regarding engineering shall be provided in metric units.
- Parking spaces for vehicles and long/short term bicycle parking shall be provided in a table. The table shall have required vs proposed columns.
- Accessibility parking shall be included in the table. Follow the Zoning By-Law Z-1 section 4.19.c.iv.
- Lay-bys will be reviewed at the site plan.
- To meet 18m from C/L along 845-875 Commissioners Rd E., the only widening required is as described by Part 1, Plan 33R-7981.

Ecology

Major Issues

- Natural heritage features on, or adjacent to the site have been identified on Map 5 of the London Plan or based on current aerial photo interpretation, including, but not limited to Environmentally Significant Areas (Westminster Ponds ESA), Provincially Significant Wetlands, Areas of Natural and Scientific Interest, and Vegetation Patches greater than 0.5 ha.
- Ecological buffers shall be applied to natural heritage features identified on/adjacent to the subject lands in accordance with the OMB Settlement results (PL170100), Table 5-2 of the Environmental Management Guidelines (2025), and London Plan Policies (LP) 1412_ to 1414_, as applicable.

Matters for Zoning

- All ecological buffers shall be updated based on the comments provided in the EIS review memo (dated November 25, 2025) and included in the appropriate Open Space (OS) zone, as per Section 5.4 of the EMGs and LP_1415.
- A holding provision to the R10-4 zone is suggested for planning to implement on the subject lands to ensure that development will not have a negative impact on relevant components of the Natural Heritage System (PSW, ESA). An agreement shall be entered into specifying appropriate development conditions and boundaries, based on an updated Environmental Impact Study, to be submitted as a part of a complete Site Plan Application, prior to removal of the holding provision.
- A holding provision to the R10-4 zone is suggested for planning to implement subject lands, to ensure a suitable location for the compensation of the proposed natural heritage feature removals (wetland community 2a and Significant Woodland Community 6) is established and protected for the long-term. The holding provision shall not be deleted until an identified compensation area has been designated on Map 1 and Map 5 of The London Plan and zoned in a manner that will ensure its long-term protection, consistent with an accepted Ecological Replacement and Compensation Plan (ERCP), all to the satisfaction of the City.

Matters for Site Plan

- Although a detailed review of the Environmental Impact Study (MTE, 2025) is deferred to the site plan application (SPA) stage, the following comments should be reviewed and considered by the applicant and their consultant and addressed as part of any future submissions to the City of London.
- Submission of the following reports will be a requirement for Site Plan Approval:
 - An updated EIS submission (or EIS addendum) addressing the matters outline in the “SLSR Components” and “EIS Components” sections of the EIS review memo dated November 20th, 2025.
 - An Ecological Replacement and Compensation Plan (ERCP) detailing the location and design of 0.02 ha of wetland compensation and 0.22 ha of significant woodland compensation.

- An Environmental Management Plan detailing the implementation of all EIS recommendations and/or including drawing references where applicable. If changes to the EIS recommendation numbers are made, please provide a table highlighting the changes to aid cross-referencing.
 - A detailed and complete feature-based water balance assessment with consideration for any required post-development mitigation measures. Details and objectives of the water balance assessment can be discussed with City of London staff during the scoping meeting.
 - An Erosion Sediment Control Plan with additional protection measures where development is proposed close to slopes above the Provincially Significant Wetland (PSW).
- If Low Impact Development (LID) measures are proposed for the site, these must be described in detail, including location, size, type, depth, cross section, groundwater separation, maintenance requirements, anticipated impacts on NHS etc. Any anticipated impacts to the existing NHS and compensation areas must be considered and addressed in a future EMP submission.

Other Issues

- The site falls within the Upper Thames Conservation Authority Regulation Limit and is subject to the *Conservation Authorities Act*. The proponent is encouraged to reach out to UTRCA to determine if permits are required.

Upper Thames River Conservation Authority

- Portions of the subject lands are regulated by the UTRCA due to riverine flooding hazards, erosion hazards, a wetland and the associated 30m adjacent lands. A Section 28 permit will be required for the proposed development.
- See provided memo from the UTRCA for detailed comments.

Heritage

- Heritage staff have reviewed the following HIA submitted as a part of Z-25141 – “Stantec, Scoped Heritage Impact Assessment, 845-875 Commissioners Road East, November 5, 2025.”. The HIA determined the following: “The assessment of impacts determined that there are no direct or indirect impacts anticipated to the Western Counties CHL or the Meeting Tree associated with the proposed development of 845-875 Commissioners Road East. As a result, mitigation and conservation measures are not required with respect to the development application.”
- Heritage staff agree with the findings of the Scoped HIA and have no further comments on the application.

Landscape Architecture

Matters for Zoning:

- Provide a minimum 1.5m setback along interior property lines to allow for tree plantings at a rate of 1 tree per 15m, as per Section 9 of the Site Plan Control By-law.
- Provide a minimum 3m setback along Commissioners Road East with tree plantings at a rate of 1 tree per 12m, as per section 9 of the Site Plan Control By-law.
- Portions of this site are located within the Tree Protection Area. Efforts should be made to maintain as many mature trees as possible. An inventory of trees being proposed for removal outside of the designated Natural Heritage Feature is required to get a summary of the diameter of tree to be removed to calculate a tree replacement number.
 - As part of the Focused Design Studies, the Owner shall have a **Tree Preservation Report** prepared for lands within the site and outside of significant Natural Heritage Features.
 - Tree preservation shall be established prior to grading/servicing design and shall focus on the preservation of quality specimen trees within Lots and Blocks and shall be completed in accordance with the Design Specifications and Requirements Manual, Chapter

12 Tree Planting and Protection Guidelines Section

12.2.2 <https://www.roadauthority.com/Standards>

- Determine the total Diameter at Breast Height (DBH) proposed for removal to determine tree replacement. The City will be using the following for tree replacements: for an Individual tree proposed to be removed, the calculation of replacement trees shall be 1 replacement tree for a trunk diameter of 50 centimetres measured at a height of 1.4 metres above ground, 2 replacement trees for a trunk diameter between 51 centimetres and 60 centimetres, and 1 additional replacement tree for every 10 centimetres of trunk diameter thereafter to a maximum of 11 replacement trees.

Matters for Site Plan:

- Provide enhanced vegetative screening for any portion of the parking lots, garbage areas or loading zones that are visible from the street with low walls and low-level all-season landscape treatments. Refer to The London Plan, Policy 282.
- Ensure proposed trees are not located within the snow storage area due to potential damage (salt, weight, etc.). Required tree plantings should not be compromised to accommodate snow storage areas.
- Ensure all parking islands have a minimum area of 10 square metres and 0.9 metres in depth with a minimum of one tree and shrubs at the base per planted island. Refer to Section 9 of the Site Plan Control By-law.
- Further landscape comments will be provided through the Site Plan process.

London Hydro

- London Hydro has no objection to this proposal or possible official plan and/or zoning amendment. Any new or relocation of the existing service will be at the expense of the owner.

ExxonMobil

- There is no Imperial infrastructure in the vicinity of this location, and there is no need for further engagement.

Chippewas of the Thames First Nation

- We have received the Notice of Planning Application concerning 845-875 Commissioners Road East, dated 10-Nov-2025. The proposed project is located within the London Township Treaty area, to which Chippewas of the Thames First Nation (COTTFN) is a signatory. It is also located within the Big Bear Creek Additions to Reserve (ATR) land selection area, as well as COTTFN Traditional Territory.
- After reviewing 845-875 Commissioners Road East, we have minimal concerns with the proposed Zoning By-law Amendment. If there are any changes to the application please notify this First Nation. If there is an Archaeology Assessment conducted, we require notification and the opportunity to actively participate by sending First Nation Field Liaisons on behalf of this First Nation.

Chippewas of Kettle and Stony Point Consultation

- Thank you for sharing information regarding the proposed project: 845-875 Commissioners Road East. We have minimal concerns about this specific project based on community perspectives and priorities. However, we are concerned about the cumulative impacts of all development and land use change in our territory. While this concern extends beyond this individual project, we want proponents to be aware and welcome collaboration or support in our community-led assessments on cumulative impacts. We do not foresee any negative impacts with this proposed project but do wish to stay informed of any changes.

CN Rail

Thank you for consulting CN on the application mentioned in subject. It is noted that the subject site is within 75 meters to CN's Spur line. CN has concerns of

developing/densifying residential uses in proximity to railway operations. Development of sensitive uses in proximity to railway operations cultivates an environment in which land use incompatibility issues are exacerbated. The [Guidelines for New Development in Proximity to Railway Operations](#) reinforce the safety and well-being of any existing and future occupants of the area. Please refer to these guidelines for the development of sensitive uses in proximity to railway operations. These policies have been developed by the Railway Association of Canada and the Federation of Canadian Municipalities. CN encourages the municipality to pursue the implementation of the following criteria as conditions of an eventual project approval:

- The Owner shall engage a consultant to undertake an analysis of noise. Subject to the review of the noise report, the Railway may consider other measures recommended by an approved Noise Consultant.
- Ground-borne vibration transmission to be evaluated in a report through site testing to determine if dwellings within 75 metres of the railway rights-of-way will be impacted by vibration conditions in excess of 0.14 mm/sec RMS between 4 Hz and 200 Hz. The monitoring system should be capable of measuring frequencies between 4 Hz and 200 Hz, ± 3 dB with an RMS averaging time constant of 1 second. If in excess, isolation measures will be required to ensure living areas do not exceed 0.14 mm/sec RMS on and above the first floor of the dwelling.
- The following clause should be inserted in all development agreements, offers to purchase, and agreements of Purchase and Sale or Lease of each dwelling unit within 300m of the railway right-of-way:

“Warning: Canadian National Railway Company or its assigns or successors in interest has or have a rights-of-way within 300 metres from the land the subject hereof. There may be alterations to or expansions of the railway facilities on such rights-of-way in the future including the possibility that the railway or its assigns or successors as aforesaid may expand its operations, which expansion may affect the living environment of the residents in the vicinity, notwithstanding the inclusion of any noise and vibration attenuating measures in the design of the development and individual dwelling(s). CNR will not be responsible for any complaints or claims arising from use of such facilities and/or operations on, over or under the aforesaid rights-of-way.”

- The Owner shall through restrictive covenants to be registered on title and all agreements of purchase and sale or lease provide notice to the public that the noise and vibration isolation measures implemented are not to be tampered with or altered and further that the Owner shall have sole responsibility for and shall maintain these measures to the satisfaction of CN.
- The Owner shall enter into an Agreement stipulating how CN's concerns will be resolved and will pay CN's reasonable costs in preparing and negotiating the agreement.
- The Owner shall be required to grant CN an environmental easement for operational noise and vibration emissions, registered against the subject property in favour of CN.
- The storm water management facility must be designed to control storm water runoff to pre-development conditions including the duration and volume of the flow and accordingly have no impacts on CN right of way, including ditches, culverts and tracks. Any proposed alterations to the existing drainage pattern affecting railway property must receive prior concurrence from CNR and be substantiated by a drainage report to the satisfaction of the Railway.

We request that CN rail and the proximity@cn.ca email be circulated on any and all public notices and notice of decisions with respect to this and future land use planning applications with respect to the subject site.

CN anticipates the opportunity to review a detailed site plan, a noise and vibration study taking into consideration the [Guidelines for New Development in Proximity to Railway Operations](#) developed by the Federation of Canadian Municipalities and the Railway Association of Canada.

Appendix D – Public Engagement

From: Kathy Kinrade
Sent: Monday, November 17, 2025 11:15 AM
To: Vivian, Melanie <mvivian@london.ca>
Subject: [EXTERNAL] Zoning application

Hi, I talked to you on the phone this morning about the zoning application for 845-875 Commissioners Rd E.

I live [redacted]

I am against this purposely as there is already too much congestion in this area. You cannot turn left at rush hour which is from 3-6pm Monday to Friday. Putting another 4 apartments in this area would be a nightmare

You do have my permission to use what I have said.

Thank you.

kathy k

From: Amy Sullivan
Sent: Tuesday, November 25, 2025 4:14 PM
To: Vivian, Melanie <mvivian@london.ca>
Subject: [EXTERNAL] File Z-25141 845-875 Commissioners Rd E

Hi Melanie,

My name is Amy Sullivan and I am a resident of [redacted], London. I wanted to share some feedback regarding file Z-25141 845-875 Commissioners Rd E.

I have lived at [redacted] for 15 years and have increasingly had issues exiting my parking lot onto Commissioners rd turning east or west especially during peak times. In some cases traffic is backup from Wellington and commissioner to the front of my apartment. We have a new building being added to the back of our lot so it will now be four buildings of people all attempting to get onto commissioner rd. Adding four more buildings as proposed would make it impossible to leave the parking lot during peak time furthering the issue we already struggle with to allow emergency vehicles access to the hospital. Eight large apartment buildings in one already extremely congested area would be poor planning.

Wanted to provide feedback, please let me know if you have any questions.

Thanks
Amy Sullivan.
Sent from my iPhone

From: s.levin s.levin
Sent: Saturday, November 29, 2025 6:29 PM
To: Vivian, Melanie <mvivian@london.ca>
Subject: [EXTERNAL] File: Z-25141

Please find attached comments and suggestions following my review of the EIS.

Regards

Sandy Levin
[redacted]
former chair ECAC

EIS: 845, 865, and 875 Commissioners Road East
SUMMARY

In its present form, the EIS does not prove there will be no negative impacts on the Provincially Significant Wetland as per the PPS and City of London policy. As shown in the work done by Beacon as of 2012, (Table 7 attached) there is risk of human disturbance and that risk increases with a smaller buffer and, of course, the more people (and their pets) introduced to an area (868

residential units in the proposed development).

Also, no field work was undertaken outside of the Legal Parcel (see EIS page 1). This would make it difficult for anyone to then claim no negative impacts on the PSW.

This means the EIS has **not** shown there will be no negative impacts.

It is also unlikely that there will be no impacts to the PSW during construction (see EIS Figure 11 which “contemplates” grading in the buffer during construction of Building D and its related parking deck despite recommendation 29 of the EIS). Also given the number of people (868 units to be constructed) who will be living adjacent to this part of the Natural Heritage System, a minimum 30m buffer as per City policies should be required where permitted under the Minutes of Settlement. This would be consistent with my reading of the Minutes of Settlement in relation to Segment A (para 5a) which indicates that the City **may** accept a reduced buffer in Segment A in accordance with the EMGs and a future EIS. My interpretation of that clause is both the EMGs **and** the EIS apply, and that the EIS does not necessarily have priority.

Figure 11 also does not appear to properly measure the distance from the parking area and the ESA boundary. It oversimplifies the buffering by showing the maximum distance and ignores the shortest. It also labels the length of what is labeled Segment A. (To this casual reader, it is not clear if the Segments mentioned in the Minutes of Settlement were areas or simply lines on a map. Schedule A of the Minutes is not included in the EIS).

Whenever the EIS is accepted by the City, the following recommendations should be adopted at the appropriate stage of planning and development.

HOLDING PROVISIONS and DEVELOPMENT AGREEMENTS

There are a variety of recommendations in the EIS that must be included in the various legal agreements as conditions of the development proceeding. In addition, the following need to be added.

WETLAND HABITAT CREATION (INCLUSION 2A)

It is unclear where in Community 2 the inclusion will be recreated.

RECOMMENDATION: The appropriate legal agreement include the metrics for identifying where is the best location for the new feature. At the end of this document is a suggested approach. The checklist was developed by EEPAC/ECAC. It may also assist in implementing EIS recommendation #7 on page 28 – creating an Ecological Replacement and Compensation Plan (ERCP).

RECOMMENDATION: The ERCP require the approval of the City.

HYDROLOGY AND SURFACE WATER

Neither report is on the City’s website. There appears to be both surface and groundwater inputs to the part of the PSW to the south of the Legal Parcel. It is unclear without reviewing the JFM report referenced in the EIS as to the changes in hydroperiod and water balance resulting from the development.

There is only one reference to water balance in the EIS (page 37) which states:

“If the wetland does not contain wet habitat in the spring, then additional hydrogeological study and water balance strategies may need to be implemented.”

RECOMMENDATION: The requirement for additional hydrogeological and water balance calculations be determined by the City’s Hydrogeologist. If additional work is required, it be included in the conditions of development.

RECOMMENDATION: No later than at detail design, there must be an evaluation of the impact of the development and change in drainage on Community 7 (of which a small section is on current City land (901 Commissioners Road E) and if negative, then there must be changes to the proposed development.

RECOMMENDATION: The EIS clarify the meaning of the following in Recommendation 18 page 30 so that it can be included in the conditions of development:

“Prior to removal of the vegetation cover surrounding the drain, effective mitigation techniques for erosion and sedimentation should be in place to protect water quality. This is especially important as the east side of the drain connects to the Westminster Ponds/Pond Mills PSW.”

It is presumed that this wetland is also supported by beaver damming of the drainage feature as there has been past efforts to clear the beaver works and the size of this Community varies

annually based on the recent air photos. There will be a change to surface water flows due to development (as noted in Recommendation 18 of the EIS) which almost most certainly will have a negative impact on this part of the PSW. It is unclear from the EIS if any of the other investigative work to date (JFM's perhaps?) has addressed this issue.

Page 25 of the EIS notes that: "Additional servicing and stormwater management details are to be determined at a later stage." It is unclear when that is to happen.

RECOMMENDATION: Determining the need for and impacts of dewatering be a requirement of additional studies of hydrogeology and surface water drainage.

Dewatering is mentioned in the EIS obliquely:

EIS Recommendation 21: "Dewatering operations must be managed to prevent erosion and/or release of sediment into the Westminster Ponds/Pond Mills PSW downstream."

The EIS has no information on any dewatering requirements. Will this be determined after additional hydroG and water balance work?

RECOMMENDATION: A one three, five and ten year monitoring requirement be included that captures triggers for adaptive management and preventing encroachment as well as sets out responsibilities for monitoring and implementation of mitigation needed if any as shown in monitoring reports.

A reason for this is that there has not been any development this close to a PSW in London in memory. As a significant part of London's Natural Heritage System, unique requirements for monitoring are called for. The proponent and its consultant should support these in support of its assurances of no negative effects.

Another reason for this recommendation is because of the weak monitoring recommendation included on page 37 section 8.3 of the EIS. In particular, the following:

"Implement adaptive management strategies if needed, such as supplemental plantings, and/or control of non-native invasive species. Adaptive management maybe triggered by poor survival/germination of planted material (80% natural groundcover is target) or the presence of unacceptable non-native and invasive species."

It is unclear whether this is a recommendation to the proponent or to the municipality. If it occurs after the end of the third year of monitoring, does it fall into a grey area?

Similarly, it is unclear what would compel the proponent or its successor or property manager to implement the following from the EIS, page 36:

"Encroachment Monitoring – Monitor for human encroachment into the ESA as a result of the development (e.g., litter present in natural features, informal trail creation). Monitoring is recommended for two years starting once phases one and two are complete. Annual reports should be provided to the City of London, and additional strategies should be implemented if required. "

RECOMMENDATION: The requirement to implement adaptive management strategies be a requirement of the proponent and this be included in the relevant development agreements and site plan approval.

RECOMMENDATION: The issue and location of permanent fencing be determined after the buffers are confirmed and the locations and requirement for emplacing the fencing be included in writing in the appropriate legal agreement.

Page 37 of the EIS is part of the Net Effects table. It is the only place where fencing post construction is mentioned. It is mentioned as a way to mitigate human disturbance to the ESA/PSW. However, It is **not** included as a recommendation in the list of recommendations included in the EIS. Therefore, one would assume that it would not be included in the special provisions or similar legal agreement with the City. Without permanent fencing that is maintained, there is an extreme likelihood that human disturbance will have a net negative impact on the natural heritage feature. For example, goldfish were introduced to the recreated wetland at 905 Sarnia Road by adjacent residents. Given the number of future residents and their pets at this site, there is a high likelihood of invasive species like goldfish being introduced to the PSW as well as predation by cats. Again, this is a negative impact missed by the EIS report and a reason for rejecting the smaller buffer.

Fencing can reduce occurrences of encroachment by humans. It can also help reduce trash blowing into the ESA by trapping some items blown against the fence.

RECOMMENDATION: A holding provision be used to ensure that the geotechnical work is carried out before the buffer is formalized.

RECOMMENDATION: The following be requirements of a holding provision rather than delayed to Site Plan as proposed by the EIS (page 40).

“Next steps include review of detailed reports (Hydrogeological Assessment, SWM Report, Geotechnical Report) and more detailed recommendations may be needed at the time of Site Plan Application. Removal of the east-west drain through the Subject Lands may require a DFO Request for Review and/or Licence to Collect Fish for Scientific Purposes.”

Page 26 also leaves this actual buffer to later steps in the development process:

“Slope setbacks here may need to be revisited as part of detailed design once geotechnical work is complete, and some grading and site clean-up may be needed within the buffer prior to development.”

It is also noted that the buffer, particularly in the eastern most section of the site is tentative as there is a slope and the geotechnical data referenced on page 3 of the EIS is almost 20 years old and may not have included the entire site. Recommendations 27 and 28 of the EIS are for additional geotechnical work to be undertaken before work on the site proceeds.

RECOMMENDATION: All buffers be staked after detail design is accepted by the City and before construction starts

This is consistent with Recommendation 28 page 32 of the EIS:

“Recommendation 28:

Finalize buffer limits along Segment C at detailed design when site cleanup and grading requirements are known along with detailed geotechnical review of the structure in this location. This structural limit will help identify the extent of proposed enhancement measures and the limits of vegetation removal.”

PRIOR TO CONSTRUCTION

RECOMMENDATION: As per EIS recommendation 34, a detailed interim SWM Plan subjected to the approval of the City, be required as a condition of development.

“Recommendation 34: A detailed interim stormwater management plan is needed to guide the construction phase and protect the adjacent PSW and other wetland features. Stormwater must be discharged away from the adjacent ESA or treated appropriately prior to discharge. This is expected to be provided along with LID measures at detailed design.”

DURING CONSTRUCTION

RECOMMENDATION: A qualified biologist, preferably from the City, be onsite during any construction that may encroach into the buffer or affect wildlife. This person needs to have the ability to halt construction to ensure avoidance or mitigation activities can be initiated and completed before construction resumes.

This would be more effective than EIS recommendation 32 on page 32

“Recommendation 32: Make workers aware of potential incidental encounters with wildlife and the necessary protections. If any animal enters the work site, work at that location must stop and the animal must be permitted to leave without being harassed.”

OTHER

COMMUNITY 6: There is a discrepancy in the EIS which should be clarified as it will relate to any adjustments to the buffer related to possible regrading in the northeastern section of the proposed development.

Page 26 includes this: “The cultural woodland (Community 6) will continue to stabilize the slope adjacent to the PSW.” However, page 25 includes: “Based on the Concept Plan presented in **Figure 9**, the proposed development will require removal of cultural vegetation cover, including Community 6 (cultural woodland) and 3 (cultural thicket). These removals are within the approved area of development as determined through the Settlement but outside the buffers discussed in feature-specific features below.”

BATS (page 17): Are there new protocols requiring acoustic surveys for bats prior to development? None are noted in the EIS.

CITIZEN SCIENCE: It appears that the consultant did not review any citizen science data sources.

CRITICAL FUNCTION ZONE: It is mentioned on page 26 and 31 of the EIS. These pages seem to be contradictory. Page 26 suggests the buffer will protect the CFZ of a SAR species that may be present, and page 31 suggests there is no Critical Function Zone outside of the buffer. No CFZ is included in the Figures nor does the EIS meet the EMG requirement of an explanation if it is determined that a Critical Function Zone is not needed.

TURTLES BASKING: It is unclear why no shoreline surveys were done for Community 10 (see page 16 of EIS) which is where the smallest buffer is permitted by the Minutes of Settlement. Many Painted Turtles were noted in Community 7. Which species is not noted in the EIS. If Midland Painted Turtle, it is not listed as Provincial at risk but included as Special Concern Federally.

REFERENCES

Table 7, Ecological Buffer Review, Beacon Environmental, 2012 (following)

Checklist for Wetland Relocation (following)

Evaluation of Buffer Width on Hydrologic Function, Water Quality, and Ecological Integrity of Wetlands

John Nieber, Principal Investigator

Department of Bioproducts and Biosystems Engineering

University of Minnesota

February 2011

Abstract:

Human activities including agricultural cultivation, forest harvesting, land development for residential housing, and development for manufacturing and industrial activities can impair the quality of water entering the wetland, thereby detrimentally affecting the natural ecological functions of the wetlands. This can lead to degradation of biota health and biodiversity within the wetland, reduced water quality in the wetland, and increased release of water quality degrading chemicals to receiving waters. Under natural conditions wetlands develop buffer areas that provide

some protection from the natural processes occurring on adjacent areas of the landscape. Buffers serve the function of enhancing infiltration of surface runoff generated on adjacent areas, thereby promoting the retention of nutrients in the soil, and retention of sediment suspended in the runoff water, while still allowing runoff water to reach the wetland through subsurface flow routes. To protect wetlands and receiving waters downstream from the wetlands it is important that wetlands in areas disturbed by human activities be provided with sufficient buffer to prevent degradation of wetland biotic integrity as well as degradation of wetland water quality. The question arises, "How much buffer is sufficient?"

The question raised by many involved in prescribing wetland buffers is what size, or more specifically what width, should the buffer be to provide adequate protection to ecosystem services of wetlands. A buffer that is too short will allow surface runoff to enter the wetland without adequate pre-treatment of dissolved and suspended constituents as well as without adequate attenuation of water flux. As a result, the water quality of the wetland can be degraded to the point where the normally expected cycling of nutrients and other constituents is upset and the aquatic habitat for both flora and fauna is degraded to the point where the ecosystem does not function adequately. Manifestations of this degraded condition are seen in the apparent transformation of a biologically diverse aquatic ecosystem into a system dominated by monocultures of more tolerant plants and animals. (p. 90)

Ecological Buffer Guideline Review

(December 2012)

Page 88

Table 7. Ranges for buffer widths to natural heritage features based on the current science.

**Natural
Heritage
Feature
Category**

Buffer Function Category

< 5 m

5 – 10 m

11 – 20 m

21 – 30 m

31 – 40 m

41 – 50 m

51 – 60 m

61 – 70 m

71 – 80 m
81 – 90 m
91 – 100 m
101 – 110 m
111 – 120 m

> 120 m WATERCOURSES and WATER BODIES

- A. Water Quantity data indicate that this is not mitigated by site specific buffer
- B. Water Quality
- C. Screening of Human Disturbance / Changes in Land Use
- D. Hazard Mitigation Zone should be based on consideration of hazards, but may overlap with buffers
- E. Core Habitat Protection

WETLANDS

- A. Water Quantity data indicate that this is not mitigated by site specific buffer
- B. Water Quality
- C. Screening of Human Disturbance / Changes in Land Use
- D. Hazard Mitigation Zone should be based on consideration of hazards, but may overlap with buffers
- E. Core Habitat Protection

UPLAND WOODLANDS and FORESTS

- A. Water Quantity insufficient data
- B. Water Quality insufficient data
- C. Screening of Human Disturbance / Changes in Land Use
- D. Hazard Mitigation Zone should be based on consideration of hazards, but may overlap with buffers
- E. Core Habitat Protection

MEADOWS

- A. Water Quantity insufficient data
- B. Water Quality insufficient data
- C. Screening of Human Disturbance / Changes in Land Use insufficient data
- D. Hazard Mitigation Zone insufficient data
- E. Core Habitat Protection*

*data available for area-sensitive grassland birds only

Note 1: In all cases the buffer is to be applied from the Critical Function Zone limit, not strictly the feature boundary.

Note 2: Supporting literature is identified in Appendix A.

Key: Risk of Not Achieving the Desired Buffer Function

HIGH

MODERATE

LOW

A CHECKLIST FOR WETLAND RELOCATIONS

The London Plan provides protection of all wetlands, however [it] does permit relocation/recreation of non-provincially significant wetlands in certain circumstances (see Policy 1334). This document provides best practises for each of the five steps of wetland relocation including: 1) measuring baseline conditions to provide targets for re-located wetland; 2) site selection; 3) planning in the context of the proposed development; 4) construction of the wetland, and 5) post-construction monitoring. The first section describes best practises using a check list format, which is followed by

an actual check list that can be used in planning and executing a wetland relocation project.

Best Practises: Five Checklists

Checklist 1. Measuring Baseline Conditions to Provide Targets for Re-Located Wetland State

The decision to move a wetland should only be made after the wetland site has been adequately studied to have an accurate measure of the pre-existing or baseline conditions. It is critical that there is in-depth knowledge of the site prior to inform any decisions regarding relocation of the preexisting

wetland. Such knowledge is also critical to ensuring a successful relocation and providing knowledge of pre-existing (baseline) conditions of the wetland for monitoring of the relocated wetland. The following questions should be addressed:

1. What is the bathymetry (area, water depth) of the wetland?

2. What is the sediment type and depth of the wetland?

3. What species live in the wetland? A minimum of a three season survey will be required to identify what is living in the wetland. Specifics of which surveys will be included will be determined at the EIS scoping meeting, but should include reptiles, amphibians, birds, fish, aquatic vegetation, including floating, submerged and emergent macrophytes and algae, and macro invertebrates. The latter have been shown to be useful indicators of wetland ecosystem health and are useful in biomonitoring (Anamaet et al., 2005; Spieles and Mitsch, 2000; USEPA, 2002). Surveys need to be balanced with minimizing disturbance to

wildlife. Therefore, it will be important to assume that there is more there than identified by surveys to avoid surprises.

4. What is the quality and character of the wetland waters, and surficial and groundwaters flowing into the wetland? Water temperature and chemistry measurements are required to determine the pre-existing (baseline or pre-disturbance) conditions of the wetland. Water chemistry should be done following an approved design that captures both spatial and seasonal variability. This should include, at a minimum, pH, specific conductivity, TDS, nutrients (i.e., TP and TN), but could also include major ions, metals, organic pollutants etc. Data loggers could be used to gain daily measurements of some variables.

5. What is the relative importance of groundwater versus surficial flows to the wetland? To understand the wetlands hydrologic budget, and particularly whether it is groundwater fed, a hydrogeological report must accompany the other surveys.

6. What is the function of the wetland? Assess the function of the wetland in terms of impact on flood management, water purification (removal of fertilizers), drought alleviation and mitigation of climate change.

Checklist 2. Site Selection for Relocation

Wetland site location must be carefully considered and informed by the studies done in checklist 1.

The following provides a checklist of critical considerations for site selection:

7. Site selection is based on the availability of land and on policies that require the restored or created wetland to be in close proximity of a wetland loss (usually due to migration considerations).

8. Site selection must consider both present and future land uses. Site selection is exceedingly important in terms of influencing the structure and function of the wetland and guaranteeing its longevity. It is imperative that once a wetland has been moved for one project that the “relocated” or offset wetland should not then itself become the subject of another development project and be relocated again.

9. Select a site with similar water depth. The floor of the new wetland should be excavated such that it has varying depths to encourage the growth of various types of vegetation. New vegetation will grow in water depths of 1 metre or less. To achieve the ideal ratio of vegetation and open water, Ducks Unlimited advises that approximately 25 percent of the created wetland area be 1 m or more in depth. Excavating some deeper areas will allow some areas to remain free of vegetation and provide habitat for native fish.

10. Select a site with a larger catchment and wetland area than the wetland being replaced. To address the problem that restoration or re-creation projects rarely, if ever, produce an equally biodiverse and functional wetland, multipliers are employed to determine the scope of an offset project. Since wetlands are particularly valuable, the offset multiplier for wetlands is usually higher compared to other areas. Studies show that larger wetlands recover faster than smaller ones, and that smaller restored or created wetlands often become more isolated. Moreover, their lack of connectivity to larger systems greatly hinders the ability of local biota to restore the wetland to pre-impact functioning (Moreno-Mateos et al., 2012).

11. Site investigations for the new wetland must include visits during spring runoff to better understand water flows, and to calculate a more accurate estimate of the catchment area.

12. Plan a wetland with an irregular shape. Ducks Unlimited suggests that the new wetland be irregularly shaped such that it closely resembles a natural wetland (as opposed to a storm pond), providing coves to shelter species.

13. A topographic survey is recommended to provide more accurate data about surface flow. Should the survey determine that the site has less than 0.6 m drop, then excavating a basin is advised to ensure adequate surface flows to maintain the wetland.

14. Test the soil/sediments at the potential site. Wetlands are characterized by impermeable soils/sediments. Fine-textured soils/sediments -- not sandy or gravelly -- are suitable. Should the soil for the new site not prove suitable, clay soils can be brought in to line the basin so that the wetland can hold water. Although a created wetland may be structurally similar to a natural wetland, its hydrology may differ greatly if the permeability of the substrates is different (Kentula, 2002). Often the soils in created wetlands contain less organic matter than natural wetlands, which may affect plant growth. Using soils from a “donor” wetland or the impacted wetland to help create the new wetland may be able to increase the soil organic matter and provide the nutrients necessary for plant species, microbes and invertebrates (Kentula, 2002). Microbes in the wetland play a crucial role in biogeochemical reactions which cause nutrient cycling and sustain other higher plants and animals (Bodelier and Dedysh, 2013).

15. **The new wetland should be located near a significant woodland or other natural feature (i.e. stream) such that it is not isolated and can be an integral part of the natural landscape.**

16. **Select a site with similar hydrogeology to the original wetland (as identified in 1.2 and 1.5) to ensure similar water chemistry and water quality (as identified in 1.4) to safeguard the relocated species.** Ideally the new wetland site will be located in close proximity to the original site, or when that is not possible within the same watershed.

17. **Site selection will require a hydrogeologic survey of the new site to demonstrate that a wetland can be sustained.** These include inflows and outflows of groundwater and surface water, the resulting water levels and the timing and duration of soil saturation and flooding (Kentula, 2002).

18. **Site selection must ensure that the water quality of the wetland is maintained.** If there are chemical inputs from the surrounding area, these can overwhelm a wetland. Chemicals can alter the productivity and composition of the plant community of the wetland, possibly favouring nuisance species, and they may harm animal species that cannot survive and breed in chemically altered waters. For example, avoid locating a wetland near roads where de-icing salts are used or near a golf course or yards where fertilizers are used.

Checklist 3. Planning of a New Wetland in the Context of the Proposed Development Project

After the decision to create a new wetland is made, the location determined, the following elements should be discussed with the proponent and included in the conditions of development (checklist 4 includes many details useful to this section):

19. **Timeline.** Timing is critical and there needs to be an agreed upon timeline with consideration of the wetland development timelines, stabilization period, timing of species transfers (see below for additional information) in consideration of the planned development project timing as well as parks planning timelines.

20. **An accepted report on baseline conditions:** including any direct sampling required such as tadpole counts, “mucking about in the muck for turtles” – (it is also acceptable to assume such wildlife is present so that no in wetland sampling will be required to avoid harm to wetland species).

21. **Width of critical function zone, buffer and composition of buffer vegetation** (see additional details below).

22. **Transfer protocols for wildlife and plants (terrestrial and aquatic), including timing of transfers.**

23. **Agreed to indicators of successful relocation.**

24. **Pre-construction requirements.** Development buildout requirements including but not limited to customized erosion and sedimentation controls and monitoring of the site, timing of species transfers (e.g., waiting for aquatic vegetation to be established), avoiding the establishment of invasive species including but not limited to phragmites and goldfish.

25. **Post construction compliance /adaptive monitoring.** This should include, but not be limited to duration, frequency, and reporting.

26. **Amount of any holdbacks or securities.** These are required to ensure successful implementation of the relocation of the wetland.

27. **There should be a requirement that any changes to the timeline or development phasing be subject to approval of the City.**

28. **Other conditions based on the preliminary work noted in previous steps may be required by the City.**

Checklist 4. Planning and Construction of the New Wetland Site

Planning and careful construction is critical to the success of the wetland and should include the following considerations:

29. **The construction of the new wetland site must be undertaken by a person with experience who has the required wetland knowledge base.** Ducks Unlimited may be a useful resource. See

<https://storymaps.arcgis.com/stories/c6d9fdf598b246dfbb21feca516fa6d4>

30. **Considerations during the design phase should be based on the information and knowledge reported in Checklists 1 and 2.**

31. **Relocate the organic salvaged marsh surface (or SMS) from the impacted wetland to the new wetland.** The SMS contains a seed bank of marsh vegetation that could prove immensely beneficial to establishing a healthy and ecologically diverse wetland. SMS provides suitable chemical substrate for wetland seed germination and survival, as well as moist physical substrate (Hunt et al., 1996).

32. **Remove perimeter soil from new wetland site before spreading the excavated soil.** This new site perimeter soil should be removed from the site as it may alter the chemistry of the transferred wetland soil.

33. **Use small and lightweight excavation equipment for both the new and old location during the project and avoid as much of the perimeter area as possible;** a narrow alleyway to the excavation area will help prevent significant soil compaction.
34. **The newly established wetland should be surrounded by a pollinator habitat and other habitat enhancements (ex. nesting boxes, hibernacula).** For example, strategically placing branches or logs in and around the wetland will provide basking areas for frogs, turtles and ducklings.
35. **Plants for the re-created wetland should be native, fast colonizing and drought resistant to account for fluctuations in weather and climate and should closely resemble those of similar, local wetlands.** Where possible, plants should be transferred from the original wetland to the new location. A variety of submergent and emergent plants should be planted, including a variety of shrubs and trees in the buffer areas to provide habitat for species as well as to ensure that water quality in the wetland is maintained. In the early years, the wetland must be closely monitored to ensure that invasive species are not permitted to colonize the area, particularly *Phragmites*.
36. **The Critical Function Zone (CFZ) is an important factor that should be included in any wetland relocation project.** The CFZ describes non-wetland areas within which biophysical functions and attributes directly related to the wetland occur. This could, for example, be adjacent upland grassland nesting habitat for waterfowl (that use the wetland to raise their broods). The CFZ could also encompass upland nesting habitat for turtles that otherwise occupy the wetland, foraging areas for frogs and dragonflies, or nesting habitat for birds that straddle the wetland-upland ecozone (e.g. Yellow Warbler). A groundwater recharge area that is important for the function of a wetland but located in the adjacent lands could also be considered part of the CFZ.
37. **Relocated wetlands require buffers** -- undisturbed vegetation adjacent to a wetland – to ensure a healthy wetland (Ducks Unlimited Canada (B)). Buffers provide habitat, food, corridors and breeding areas for species while also reducing the harmful effects of nearby development or activities on wetlands. A buffer of 20-50 meters beyond the CFZ will decrease sedimentation and improve water quality, while a buffer that extends beyond 50 meters is best for wildlife and water quality (Ducks Unlimited Canada (B)). The minimum buffer width will depend on the size of the wetland, the purpose of the buffer, the land use of the surrounding area, soil type (less permeable soil will require larger buffers) and slope (Ducks Unlimited Canada (B)). For instance, a smaller, deeper, excavated wetland with minimal wildlife or hydrological value could require a buffer of only ten metres, while a wetland where the slope of the land is greater than 5 percent would require a buffer greater than 20 meters (Ducks Unlimited Canada, (B)). All these factors should be considered together when determining the buffer size. The buffer should consist of diverse, multi-layered vegetation, incorporating trees and shrubs. In all instances of created wetlands and their associated buffers, the vegetated buffer areas must be managed and maintained over the long-term to ensure that they are providing the maximum benefit to the wetland (Ducks Unlimited Canada (B)).
38. **Species transfers must be carefully planned and appropriate timelines developed to ensure that relocation of species occurs after the pond has stabilized and is occurring in a “safe” season to avoid interference of breeding species.** Species transfer should not occur until a year has passed since the creation of the new wetland to allow the environment to settle and to ensure that the water quality and nutrients can safely support wildlife. The planning phase should also consider timelines for species moves. For example, as learned from Sarnia 905, establishing appropriate aquatic vegetation ahead of the introduction of other species is critical. Monitoring of the site should confirm ideal conditions before any species transfers take place.
39. **Species transfer should occur slowly.** Species transfer should not occur during a single day or even week, but should be carried out over an extended period of time - and slowly - to ensure minimal negative impact and to increase the possibility of capturing more individuals from the original wetland site. Options for manual transfer for species include baited minnow trapping, dip netting, seine netting and hand picking. Once the individuals are captured, they are transferred to the new wetland in buckets. If insufficient resources are available to do manual transfers of species, other options are possible. For instance, if the new wetland site is sufficiently close to the old one, a trench could be dug from one site to the other to allow species to transfer naturally. Alternatively, the new wetland location could be situated near a stream or other water source to allow species to populate the created wetland on their own.
40. **Timing of the transfer is crucial.** The breeding time of certain species (i.e. the Western Chorus frog) as well as the schedules of burrowing animals (i.e. crayfish) must be accounted for throughout the process.

41. Wetland relocation plans need to be carefully coordinated with development plans.

This will have to be planned and coordinated with the development construction plans. For example, fences, pathways and landscaping that might impact the new wetland must be completed efficiently to ensure wetland success.

42. Appropriate signage is in place at the start of wetland construction to reduce the introduction of invasive species and provide nearby residents with a reason to protect the site. Such signage should include education about wetlands and by-law enforcement should provide enforcement of relevant by laws.

Checklist 5. Monitoring the New Wetland Site

A recent review done to inform Ontario policy on wetland offsetting, recognized that relocated wetlands can take up to 30 years to fully establish (Maron et al., 2012). With this in mind, long-term monitoring is a critical part of wetland relocation. All wetland relocations must include a monitoring

plan which are required to be included in the conditions of development. This recommendation is critical given: 1) the lack of evidence that such altered and/or created wetlands recover full functionality; 2) the long lags associated with wetlands' maturation, and 3) the important ecosystem services and ecological integrity provided by wetlands. Before the monitoring process begins, developers and the City must clearly define what a "successful" relocation or restoration would entail for each *individual* project and outline a clear set of objectives to be included in the conditions of development.

For example, Wetland birds are one of 6 key indicators of wetland health used by the Great Lakes Coastal Wetland Monitoring Program (the other 5 indicators are: frogs, fish, macroinvertebrates, vegetation, and water quality), a globally-renowned well-established bi-national monitoring program of Great Lakes coastal wetland health. The link to the program's website is immediately below, and a link to

a peer-reviewed paper that describes and justifies the program is below that.

<https://www.greatlakeswetlands.org/Home.vbhtml>

https://www.greatlakeswetlands.org/docs/Publications/Uzarski_et_al_2016_methods.pdf

Monitoring plans should be based on:

43. Defining what a "successful" relocation or restoration would entail for each individual project and outline a clear set of objectives. For instance, even if a site has revegetated, it could be functionally inadequate, and/or the plant composition may differ from the initial targets.

44. Establishing the methods to determine the success of wildlife transfer and establishment. Monitoring plans must include measures of success and failure, and accountability and consequences for failed wetlands based on baseline conditions (identified in checklist 1).

45. Monitoring plans that include surveys and measurements identical to those done in section 1 should be done at a minimum 1, 3 and 5 years after the establishment of the wetland and compared to the baseline conditions determined in checklist 1. Ideally there would be measurements taken 10 years after the establishment of the wetland.

46. Monitoring plans that include remediation plans. For example, if monitoring indicates that certain populations are in decline, additional individuals can be transferred into the compensation wetland (e.g. import tadpoles or broadcast more native seeds).

47. Monitoring plans that include a rapid detection and rapid response for problems such as invasive goldfish. Rapid detection may provide an opportunity for citizen science.

48. Monitoring plans that consider nutrient controls. For example, yard fertilizers could contribute unwanted nutrient loads to wetlands.

Check Lists for Planning and Executing Wetland Relocation Projects

Checklist 1. Measuring Baseline Conditions to Provide Targets for Re-Located Wetland State

1. What is the bathymetry (area, water depth) of the wetland?

2. What is the sediment type and depth of the wetland?

3. What species live in the wetland?

a. Three season survey will be required to identify what is living in the wetland.

b. Specifics of which surveys will be included will be determined at the EIS scoping meeting

i. Reptiles

ii. Amphibians,

iii. Birds

iv. Fish

v. Aquatic vegetation (including floating, submerged and emergent macrophytes and algae)

vi. Macro invertebrates.

4. What is the quality and character of the wetland waters, and surficial and groundwaters flowing into the wetland?

- a. Water temperature
- b. Water chemistry measurements (provide number of measurements and timing)
 - i. pH
 - ii. specific conductivity
 - iii. TDS
 - iv. nutrients (i.e., TP and TN)
 - v. major ions
 - vi. metals
 - vii. organic pollutants
 - viii. Data loggers could be used to gain daily measurements of some variables.

5. What is the relative importance of groundwater versus surficial flows to the wetland?

- a. Hydrologic budget, and particularly whether it is groundwater fed
- b. A hydrogeological report must accompany the other surveys.

6. What is the function of the wetland? Assessments need to be scientifically rigorous.

- a. Assess the function of the wetland in terms of impact on flood management
- b. Assess the function of the wetland in terms of water purification (removal of fertilizers),
- c. Assess the function in terms of drought alleviation
- d. Assess the function in terms of mitigation of climate change.

Checklist 2. Site Selection for Relocation

7. Site selection is based on the availability of land and on policies that require the restored or created wetland to be in close proximity of a wetland loss (usually due to migration considerations).

- a. What is the distance of the relocated wetland from the old wetland?

8. Site selection must consider both present and future land uses.

Is the new site in an area targeted for future development?

9. Select a site with similar water depth.

- a. What is the depth proposed for the relocated wetland? Provide mean depth and maximum depth.
- b. What is the difference in depth between the relocated and old wetland?
- c. Provide a bathymetric map for the new wetland.

10. Select a site with a larger catchment and wetland area than the wetland being replaced.

- a. What is the catchment area of the relocated wetland?
- b. What is the difference in catchment area between the relocated and old wetland?

11. Site investigations for the new wetland must include visits during spring runoff to better understand water flows, and to calculate a more accurate estimate of the catchment area.

- a. Spring runoff waterflows

12. Plan a wetland with an irregular shape.

- a. Provide a sketch of the new wetland.

13. A topographic survey is recommended to provide more accurate data about surface flow.

- a. Provide the topography of the catchment of the relocated wetland.

14. Test the soil/sediments at the potential site.

- a. What are the soils/sediments at the old wetland (bottom of the wetland and CFZ)?
- b. What are the soils/sediments at the relocated wetland (bottom of the wetland and CFZ)?
- c. Will soils from the old wetland be relocated to the new? Why or why not?
- d. If old wetland soils/sediments will not be used, how will appropriate soils/sediments be found?

15. The new wetland should be located near a significant woodland or other natural feature (i.e. stream) such that it is not isolated and can be an integral part of the natural landscape.

- a. Provide a description of the lands surrounding the old and relocated wetland.

- i. soils
- ii. vegetation
- iii. CZ and upland areas

16. Select a site with similar hydrogeology to the original wetland (as identified in 1.2 and 1.5) to ensure similar water chemistry and water quality (as identified in 1.4) to

safeguard the relocated species. Identify targets for relocated wetland for

- a. Temperature (min, max, mean)
- b. Water chemistry
 - i. pH
 - ii. specific conductivity
 - iii. TDS
 - iv. nutrients (i.e., TP and TN)
 - v. major ions
 - vi. metals
 - vii. organic pollutants

17. Site selection will require a hydrogeologic survey of the new site to demonstrate that a wetland can be sustained.

18. Site selection must ensure that the water quality of the wetland is maintained.

- a. Will there be potential contamination from de-icing salts?
- b. Will there be potential contamination from fertilizers?
- c. Will there be potential contamination from pesticides?
- d. Will there be potential contamination from organopollutants?
- e. Others?

Checklist 3. Planning of a New Wetland in the Context of the Proposed Development Project

After the decision to create a new wetland is made, the location determined, the following elements should be discussed with the proponent and included in the conditions of development (checklist 4 includes many details useful to this section):

19. Timeline.

- a. Provide a timeline for wetland relocation with consideration of development project timing.

20. An accepted report on baseline conditions:

- a. Provide a report on baseline conditions for city review.

21. Width of buffer and composition of buffer vegetation.

- a. Provide a plan and justification for buffers and CFZ

22. Transfer protocols for wildlife and plants (terrestrial and aquatic), including timing of transfers.

- a. Provide a plan for transfers (timing and methods).

23. Agreed to indicators of successful relocation.

- a. Provide a list of indicators for success/failure. Some examples:

- i. Species Indexes
- ii. Biodiversity Measures

24. Pre-construction requirements to protect wetlands.

- a. Development buildout requirements including but not limited to customized

- i. erosion and sedimentation controls and monitoring of the site
- ii. timing of species transfers (e.g., waiting for aquatic vegetation to be established)

- iii. avoiding the establishment of invasive species including but not limited to phragmites and goldfish.

25. Post construction compliance /adaptive monitoring.

- a. This should include, but not be limited to

- i. duration
- ii. frequency
- iii. reporting
- iv. other

26. Amount of any holdbacks or securities.

27. A requirement that any changes to the timeline or development phasing be subject to approval of the City.

28. Other conditions based on the preliminary work noted in previous steps may be required by the City.

Checklist 4. Planning and Construction of the New Wetland Site

Planning and careful construction is critical to the success of the wetland and should include the following considerations:

29. Who is responsible for wetland construction?

30. Will the organic salvaged marsh surface (or SMS) from the impacted wetland to the new wetland? If not what sediment will be used and why.

31. Remove perimeter soil from new wetland site before spreading the excavated soil.

32. Use small and lightweight excavation equipment for both the new and old location during the project and avoid as much of the perimeter area as possible

33. The newly established wetland should be surrounded by a pollinator habitat and other habitat enhancements (ex. nesting boxes, snakes).

a. Provide detailed plans for terrestrial vegetation species to be planted and the location.

b. How will invasives be prevented and controlled

c. Provide details about other habitat enhancements

34. The Critical Function Zone (CFZ) is an important factor that should be included in any wetland relocation project.

a. Provide detailed plans for the CFZ.

35. Relocated wetlands require buffers.

a. What is the width of the buffer? Does this include the CFZ?

36. Species transfers must be carefully planned and appropriate timelines developed to ensure that relocation of species occurs after the pond has stabilized and is occurring in a “safe” season to avoid interference of breeding species.

a. **What species will be transferred and when**

i. Reptiles

ii. Amphibians

iii. Fish

iv. Aquatic vegetation (including floating, submerged and emergent macrophytes and algae)

v. Macro invertebrates.

7. Species transfer should occur slowly.

a. Provide a plan for species transfers.

8. Appropriate signage is in place at the start of wetland construction to prevent invasive species.

a. How will signage be used?

b. What communications will be made to residents and others and what will be included in these communications.

Checklist 5. Monitoring the New Wetland Site

Monitoring plans should be based on measures of success described in checklist 3.

49. Provide measures of success and of failure.

50. Monitoring plans that include surveys and measurements identical to those done in section 1 should be done at a minimum 1, 3 and 5 years after the establishment of the wetland and compared to the baseline conditions determined in checklist 1.

a. Water temperature

b. Water chemistry measurements (provide number of measurements and timing)

i. pH

ii. specific conductivity

iii. TDS

iv. nutrients (i.e., TP and TN)

v. major ions

vi. metals

vii. organic pollutants

viii. Data loggers could be used to gain daily measurements of some variables.

51. Monitoring plans that include remediation plans.

a. Describe remediation plans.

52. Monitoring plans that include a rapid detection and rapid response.

a. **Describe plans for invasives (e.g. goldfish, phragmites)**

53. Monitoring plans that consider contaminant controls.

a. Describe plans for excessive nutrients, salts, other contaminants.

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Nov 23/2025

To Whom It May Concern:

Yes, we need housing in London. I live at [redacted]. There is a building going up behind this one. It makes four total in this area, 14 floors in each. I am not complaining but the Victoria hospital maintenance yard is busy on one side. Sounds of trucks backing up, ding, ding, ding, are loud. The railway line north and south of Adelaide S, a stream next to the new bldg. and noisy ambulances going to the hospital from Adelaide Street South.

I think the bldg. will be blocking my sunlight in the afternoon. I may face someone else's balcony across from me. Joy to the world. I would rather have had a 4 floor parking garage for the hospital staff instead. Since the construction started, there is no use in my perspective. However, I wanted you to know how I feel about it all. Thanks for listening, have a great day.

Sincerely yours,

Marrion Jeffery

From: Pavlina Faltynek

Sent: Tuesday, December 2, 2025 8:39 PM

To: Hillier, Steve <shillier@london.ca>; Vivian, Melanie <mvivian@london.ca>

Subject: [EXTERNAL] Requested Feedback on File Z-25141

Hello Ms. Vivian,

My name is Pavlina Faltynek, and I'm a property owner at [redacted]. Like many residents/owners, I received notice of a proposed by-law amendment at an adjacent site to our property, and would like to submit the following documents as part of Council's request for feedback on the proposed amendment.

Attached, please find my personal statement on this issue, as well as an objection letter signed by 43 residents at [redacted].

I respectfully request that these documents be added to the public record on this issue.

Please do not hesitate to get in touch with any questions, and I look forward to discussing this matter further with City Council on January 6th, 2026.

Thank you,

Pavlina Faltynek

December 1st, 2025

To: London City Council, Planning and Environmental Committee

c/o Melanie Vivian, Planning & Development

London ON PO Box 5035

N6A 4L9

From: Pavlina Faltynek, MSc, PhD(c)

[redacted]

Re: File: Z-25141 Zoning By-law Amendment 845-875 Commissioners Rd E.

To London City Council, Planning and Environmental Committee,

As a property owner at [redacted], I wish to respond to the London City Council's request for community feedback on the proposed by-law amendment for 845-875 Commissioners Rd E. Please accept this document as a summary of my concerns regarding the proposed amendment.

London's Housing Crisis

In June 2025, it was reported that approximately 2000 people in London were experiencing homelessness. The number of individuals sleeping rough in London has increased by 19% since 2022, with an estimated cost to the city of over \$100 000, per person, per year. This can only be described as a crisis. As London's population continues to grow, so does its need for affordable housing. The average one-bedroom apartment for rent in London costs approximately \$1700/mo. With the mean income in London just over \$50,000 per year (before tax), many Londoners are already finding the cost of living unaffordable. We know that unstable housing leads to increased service use and cost in other areas, such as increased usage of the London Food Bank, Emergency and First Responder Services, as well as Child and Social Services.

The private corporation, Auburn Developments, seeking this by-law amendment, has made it clear they are a builder of luxury homes and condominiums. With a 2.9% residential vacancy rate (the highest seen in over a decade), landlords offering incentives to lease existing units, and a 6% increase in the cost of rent, luxury condominiums are not the housing solution London needs right now. City Council has pledged 47,000 new units by 2031 in its housing strategy, but supporting Londoners means affordable housing. London's plan for a network of 600 highly supportive housing units would go much farther in directly meeting the needs of Londoners than luxury condominiums.

One of the things I love most about London is our unique yellow-bricked buildings, from clay indigenous to our region. Every season, I see more of our lovely structures deteriorating, being boarded up, and remaining empty. My concern is that the proposed development will ultimately increase the cost of average rent in London and contribute to our high vacancy rates, while existing space continues to go unused and our residents' needs remain unmet.

Environmental Impact

The proposed by-law amendment refers to a space located directly next to one of London's most important ecological systems and protected natural spaces, Westminster Ponds/Pond Mills Conservation Area.

This Environmentally Significant Area (ESA) is home to more than 200 vegetation communities, 757 vascular plants (30 are nationally rare), over 200 bird species, 19 species of fish, 14 species of reptiles, and dozens of mammal species, including rabbits, foxes, and deer. The potential impact of the proposed development on this ESA is

significant. Collisions with windows and buildings kill approximately 42 million birds per year in Canada. London has one of the highest rates of vehicle and deer collisions in the province due to our surrounding green space. I remember several occasions looking out my window across the street at Commissioners Rd E and seeing deer and foxes on the proposed development site. This development would significantly increase the volume of negative animal-human interactions. Ontario's Provincial Policy Statement, 2020 states that development and site alteration shall not be permitted on adjacent lands to ecologically significant areas unless it has been demonstrated that there will be no impact on the natural features or ecological functions of that protected area.

Although Auburn Developments claims to be environmentally friendly by using energy-efficient windows and other 'carefully sourced' materials, these measures are significantly behind what is considered environmentally conscious by today's standards. Meanwhile, London has declared an environmental crisis. As the City Council has stated in their London Climate Emergency Action Plan "City Council continues to recognize the importance of climate change mitigation, sustainable energy use, and the need for a more sustainable and resilient city", this includes greenhouse gas reduction goals, improved climate resiliency, reducing loss of biodiversity, and encouraging low-impact developments. This development would directly increase greenhouse gas emissions next to an ESA and produce significant amounts of non-recyclable building scrap waste.

I strongly agree with the principles and goals already laid out by Council with respect to mitigating climate change and urge Council to remain steadfast in supporting these goals. Green technology and resources exist to retrofit existing structures for habitation, without creating unnecessary waste and negatively impacting our green spaces. The approval of this by-law amendment would be in direct conflict with the thoughtful climate strategy already laid out by Council.

Lack of Supportive Infrastructure

The site related to the proposed by-law amendment is located in an area where there is already a strain on existing infrastructure and resources, making a high-density complex impractical at this site. Two major hospitals are steps away from 845-875 Commissioners Rd E, where traffic is already highly congested and emergency vehicles struggle to get through. Combined with the shortage of family doctors in London, individuals at this site are more likely to visit the Emergency Department at Victoria Hospital than drive to a walk-in clinic or go see a family doctor when needing care. This would add to the overcrowding we see in the Emergency Department every day at Victoria Hospital.

Other necessary resources for a high-density development are also lacking, such as schools/school spaces and childcare spaces. Thames Valley District School Board is one of the fastest-growing school board in Ontario, and an additional 8700 spaces are needed to meet demand by 2033. More than half of London's schools need repairs, and many in the South and East ends of London are shut down during the Spring/Summer months due to high internal temperatures from a lack of air conditioning. According to the Financial Accountability Office of Ontario, the cost of repairs and meeting demand for school spaces will exceed \$490 million over the next ten years. Mary Henry, President of CUPE Local 4222, representing Thames Valley employees, has expressed serious concerns about keeping up with increasing enrollment as 40% of London schools are already over capacity. Over-capacity schools mean more children are in portables (which have unstable temperatures), and need to travel to schools outside of their neighbourhood using personal or public transportation. For infants and toddlers, London is already considered a childcare desert according to a 2023 report by the Canadian Centre for Policy Alternatives. London ranked in the bottom 25% of cities across Canada for available childcare coverage. This means that only one in ten children in London can find a childcare spot in the city. Parents are having to apply to over 40 daycare waitlists, and waiting 8-14 months to secure a place. This means parents may be delaying returning to work after parental leave, and experiencing economic hardship due to a lack of childcare resources.

Soil Contamination and Noxious Gas

Last, and perhaps most importantly, the adjacent property of 955 Commissioners Rd E, was found to have surface levels of methane gas above the lower explosive limit according to a Methane Gas Study conducted by EXP Services dated 2022. This covers areas which were part of the City of London's Glen Cairn Fill Site. In addition to household waste, this site also accepted other toxic materials such as light bulbs and batteries. Raw sewage has also been an issue in the past at this site.

Sufficient testing needs to be carried out prior to any amendment consideration to determine if a change in land use is safe, and any associated risks. The spread of methane gas, toxic chemicals, and sewage through the earth is a known effect of landfill sites. The disruption of this site may have significant consequences on the safety of residents at this location, as well as a serious negative impact on the ESA of Westminster Ponds.

Conclusion

Ontario's Provincial Policy Statement, 2020, encourages the development of appropriate and affordable market-based housing. Communities must be healthy, liveable, and safe through informed patterns of land use which stimulate the financial well-being of the Province and Municipalities in the long term. I understand that growth is a key component of economic stability. An increased population means more working-aged individuals, ideally more skilled workers in the city, and more individuals putting tax dollars back into London's resources. However, unstable growth, as we've seen over the last several years, can have the opposite effect on a city. London is currently struggling to meet the demands and needs of its residents. City Council has already discussed this several times and put forward many thoughtful proposals to address the long-term needs of London's communities. I once again urge City Council to remain steadfast in its mission to address the existing gaps in resources for Londoners, and to take action in the best interest of Londoners by rejecting this proposed by-law amendment. With municipal

elections taking place in October of 2026, demonstrating a commitment to overcoming London's challenges, no matter how complex, is at the forefront of our community's mind.

I hope City Council will consider this feedback thoughtfully, and I look forward to supporting Council's discussion of this matter further, and providing any additional information to Council on January 6th, 2026.

Sincerely,

Pavlina Faltynek

References

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declaration

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<https://london.ca/sites/default/files/2023-03/FINAL%20955%20Commissioners%20Road%20East%20-%20Z-9572%20%28BH%29.pdf>

From: Sarah Ann

Sent: Monday, December 1, 2025 12:27 PM

To: Vivian, Melanie <mvivian@london.ca>

Cc: Hillier, Steve <shillier@london.ca>

Subject: [EXTERNAL] Formal Objection to Planning Application Z-25141 (845–[875 Commissioners Rd E](#)) – Environmental & Wildlife Impacts

Dear Ms. Vivian and the Planning & Development Department,

I am writing to submit a formal objection to Planning Application Z-25141 for 845–[875 Commissioners Road East](#). After reviewing the Environmental Impact Study (EIS) submitted with this application, I am extremely frustrated and deeply concerned by both the findings and the significant ecological damage this project will cause.

1. The EIS confirms that this development will permanently destroy wildlife habitat

The EIS clearly identifies wetlands, wooded patches, and multiple wildlife habitats on and adjacent to the site. It also confirms the presence of numerous species, including deer, coyotes, rabbits, beavers, wild turkeys, raptors, and other mammals and birds that regularly use this area for foraging, nesting, and movement.

Despite this, the proposal involves extensive vegetation clearing, grading, and the removal of entire sections of habitat. Even the consultant acknowledges that habitat loss and wildlife displacement are **unavoidable**. That alone should warrant serious reconsideration.

2. The study identifies several ecological impacts that cannot be mitigated

While the EIS lists generic mitigation strategies, it also makes clear that key impacts cannot be avoided, including:

- Loss of tree canopy and wooded areas
- Disruption of hydrology and wetland function
- Fragmentation of natural corridors used by wildlife

- Permanent displacement of species currently living in and around the site

Replacing a thriving natural area with four 14-storey buildings and 868 units is an irreversible change.

No buffer or tree-replacement plan can replicate the habitat that exists today.

3. The mitigation measures proposed are insufficient and largely superficial

Most of the proposed mitigation — fencing during construction, sediment control, limited replanting, seasonal timing — does nothing to address long-term ecological destruction. It simply helps the developer meet minimum requirements rather than truly preserve environmental function.

The EIS does not evaluate meaningful alternatives, such as reduced density, a smaller development footprint, or preserving larger portions of natural habitat. It is troubling that a report meant to protect sensitive environmental features instead rationalizes their removal.

4. The conclusion of “acceptable impacts” is not supported by the data

The report acknowledges the presence of wetlands, forest patches, wildlife habitat, hydrologically sensitive areas, and multiple species — yet still concludes the development can proceed. This conclusion feels predetermined rather than evidence-based.

5. This project contradicts the City’s stated environmental priorities

London frequently promotes its commitment to sustainability, biodiversity, and the protection of natural heritage features. Approving a project that destroys functioning habitat and displaces wildlife moves in the opposite direction.

Our community should not have to lose natural lands and wildlife so easily — especially for a development of this size and intensity.

Request

Given the environmental findings in the EIS and the significant gaps in its analysis, I respectfully request:

1. That this application be reconsidered in its current form.
2. That a more rigorous, independent review of environmental impacts be completed.
3. That alternatives with substantially lower ecological impact be explored.
4. That my comments be added to the official public record for Application Z-25141.

I urge the City to take these ecological concerns seriously and to recognize that once these natural habitats are gone, they are gone forever. Our wildlife and our community deserve better stewardship.

Thank you for your time and consideration.

Sincerely,

Sarah Sousa

[redacted]

From: Mark Wilson

Sent: Tuesday, December 2, 2025 5:42 PM

To: Vivian, Melanie <mvivian@london.ca>

Cc: Hillier, Steve <shillier@london.ca>

Subject: [EXTERNAL] Zoning By-law Amendment File: Z-25141

Mark Wilson

[redacted]

London ON [redacted]

Zoning By-law Amendment File: Z-25141

Good Afternoon,

I would like to provide you with my comments and observations as to why I oppose the proposed re-zoning of property 845-875 Commissioners Rd E. I've lived at [redacted] for 25 years, and the increase in traffic, noise, and congestion has been significant. Despite these issues, there have been no improvements to the current transportation infrastructure to accommodate more than 2 decades of the growing volume of vehicles.

Per the Transportation Impact Assessment, Page 43, Section 6, Conclusions and Recommendations, subsection 6.1 Conclusions, the impact on traffic is also a concern.

The report acknowledges delays and poor service levels (LOS F) for northbound and southbound outbound traffic at the current access intersections, yet still recommends approving the proposed changes. However, I'm concerned that the traffic study doesn't consider the two developments directly across Commissioners Road:

1. - A 14-story development with 110 units and 252 parking spaces is already under construction at 852 Commissioners Rd E, with a projected completion date of 2027.
2. - A 5-story development with approximately 45 units is planned to the east of 856 Commissioners Rd E, at 874/876 Commissioners Rd E.

Both of these developments will also contribute to further congestion.

Additionally, I'm not aware of any mention of the CN railroad tracks that is within the 700-meter zone between Adelaide St S and Western Counties Rd. These tracks are

used daily and significantly impact traffic along Commissioners Rd already

Furthermore, as suggested in the Transportation Impact Assessment, a future possibility of adding more traffic signals in a 700-meter distance between Western Counties Road and Adelaide St S, intersections controlled by signals, is not a viable solution. It will only exacerbate existing delays and congestion. If merging onto Commissioners is impossible, whether eastbound or westbound, this solution won't address the root cause. The only potential "viable" solution I see might be to put in a round-about, thus allowing traffic to keep flowing east and west as well as allowing ingress/egress from both sides of Commissioners, This would also allow pedestrians safer access, on designated crosswalks, possibly raised, to cross to the opposite sides of Commissioners eg: for access to public transportation. This will not help residents of 874/876 Commissioners as their only ingress/egress as set out in the Joint Use and Maintenance Agreement with 856 is the use of the east entranceway on Commissioners on the property of 856.

Regarding the environmental impact study, Westminster Ponds, the city's largest Environmentally Significant Area and Cultural Heritage Landscape, is directly adjacent to this development. While I appreciate the assessment of land, flora, fauna, and wildlife, I didn't see any mention of the increased environmental pollution, including noise pollution and greenhouse gases from the buildings and vehicles. It's a nice idea that unbundling parking spaces from residential units will reduce vehicle numbers, but with 909 parking spaces, they'll likely be filled. Otherwise, why offer 909 spaces for 868 residential units?

I appreciate you taking your time to review my thoughts and look forward to the in person meeting in January.

Thank you

Mark Wilson

From: Ray Stanton
Sent: Monday, March 16, 2026 1:21 PM
To: Vivian, Melanie <mvivian@london.ca>; Hillier, Steve <shillier@london.ca>
Subject: [EXTERNAL] 845-875 Commissioners Road East

Hello Melanie and Steven: I am writing concerning the Zoning Amendment application for this property as I received a Notice of Public Meeting today. I will not be able to attend this meeting but I just wanted to let you know that I am fully supportive of this project, it appears to be an attractive development and it will hopefully breathe new life into this area. Please let me know if I can be of any further assistance. All the best, Ray Stanton, London Property Corp.

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From: Heather Popham
Sent: Monday, March 23, 2026 8:19 PM
To: Vivian, Melanie <mvivian@london.ca>
Subject: [EXTERNAL] OBJECTION: Z-25141 - 845-875 Commissioners Road East

Heather Popham

[redacted]

March 23, 2026

I am writing to formally express strong opposition to the proposed rezoning and high density residential development associated with Application Z-25141, which contemplates the construction of four 14-storey apartment buildings at 845-875 Commissioners Rd. East.

While I understand the need for housing intensification, this proposal raises serious and unacceptable environmental concerns.

1. Loss of Green space. The scale of this development will inevitably result in significant removal of existing vegetation, including mature trees that play a critical role in carbon sequestration, urban cooling and air quality improvement. Although the Environmental Impact Study states there is an abundance of invasive species, such as common buckthorn, that is not the only vegetation and a cultural woodland and thicket will be affected.

2. Impact on Local Ecosystems and Biodiversity. This site is a wildlife corridor and includes a provincially significant wetland. Threatened species, including the Eastern Meadowlark and Blandings Turtle, are found in this area, and this development will fragment the habitat. A reptile hibernaculum was found on site, and the recommendation is to build a new one. No matter what mitigation efforts are made, once something is lost you cannot recreate it, it will never be the same or as effective.

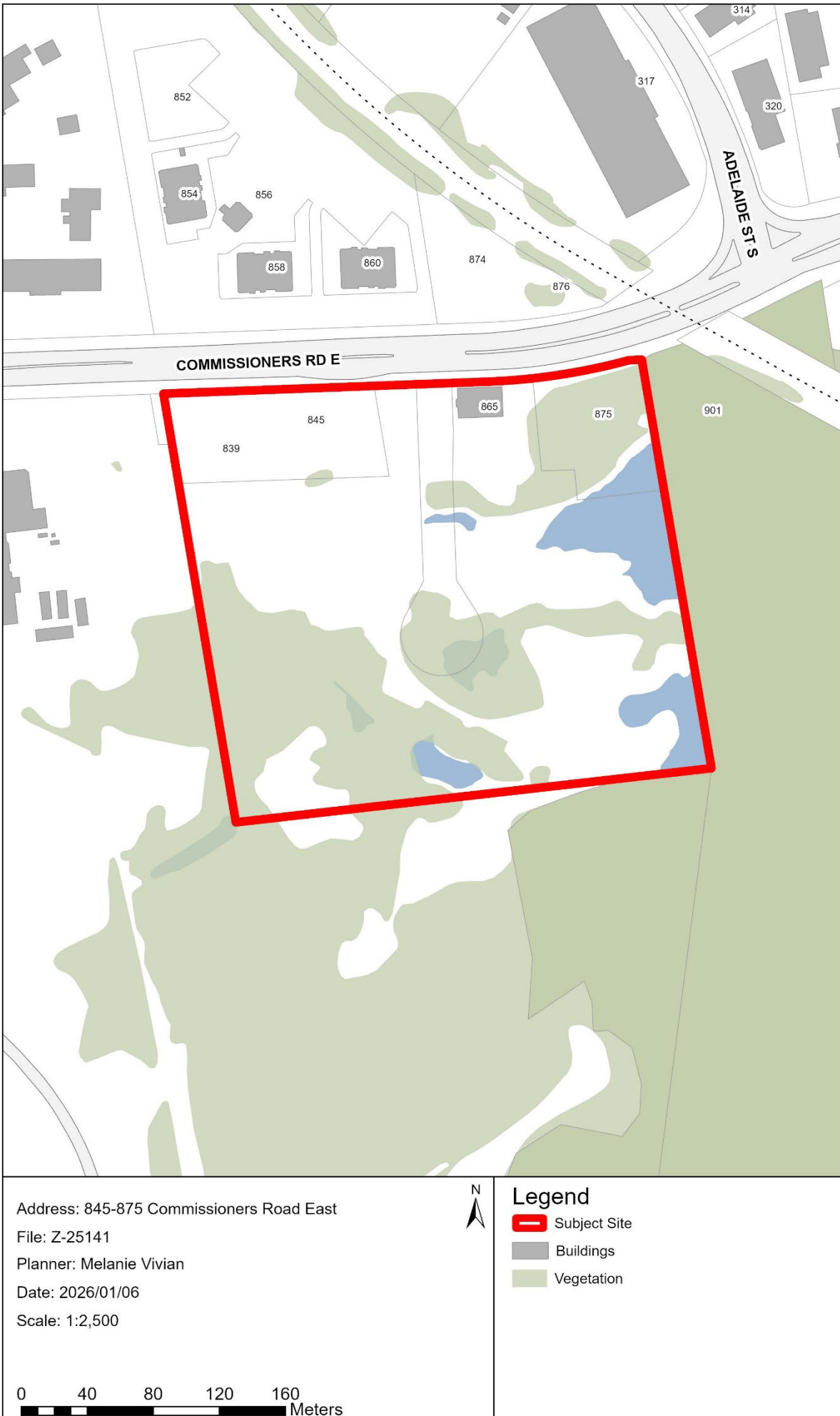
3. Increased Emissions and Traffic. There will be an increase in emissions that will negatively impact air quality, contradicting broader municipal and provincial climate objectives.

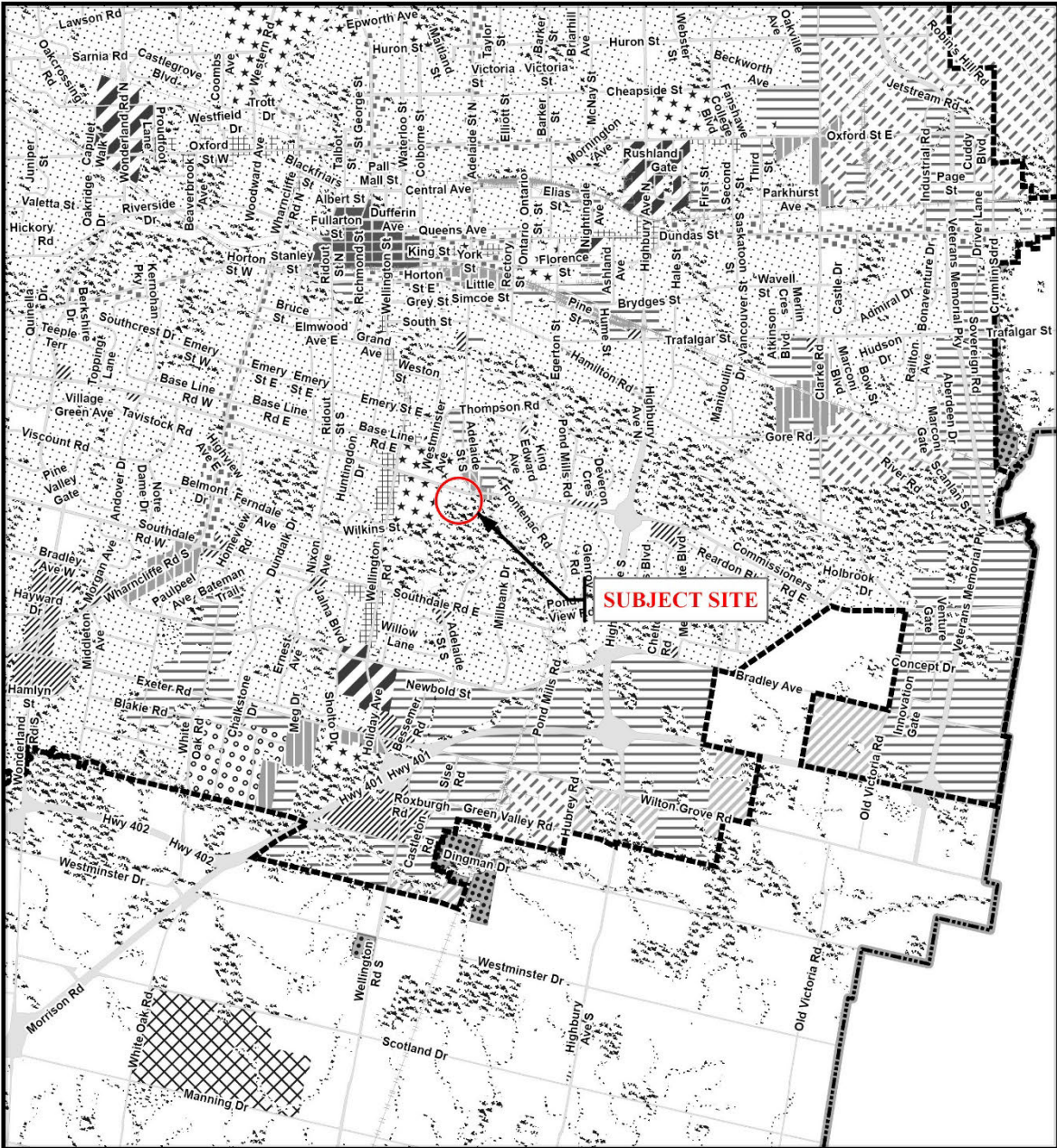
In its current form, this proposal does not reflect responsible or sustainable urban planning. I strongly urge the City to reconsider the scale and environmental implications of this rezoning application, and to prioritize development approaches that genuinely balance growth with environmental protection.

Thank you for your time,

Heather

Appendix E - Additional Background





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 | |

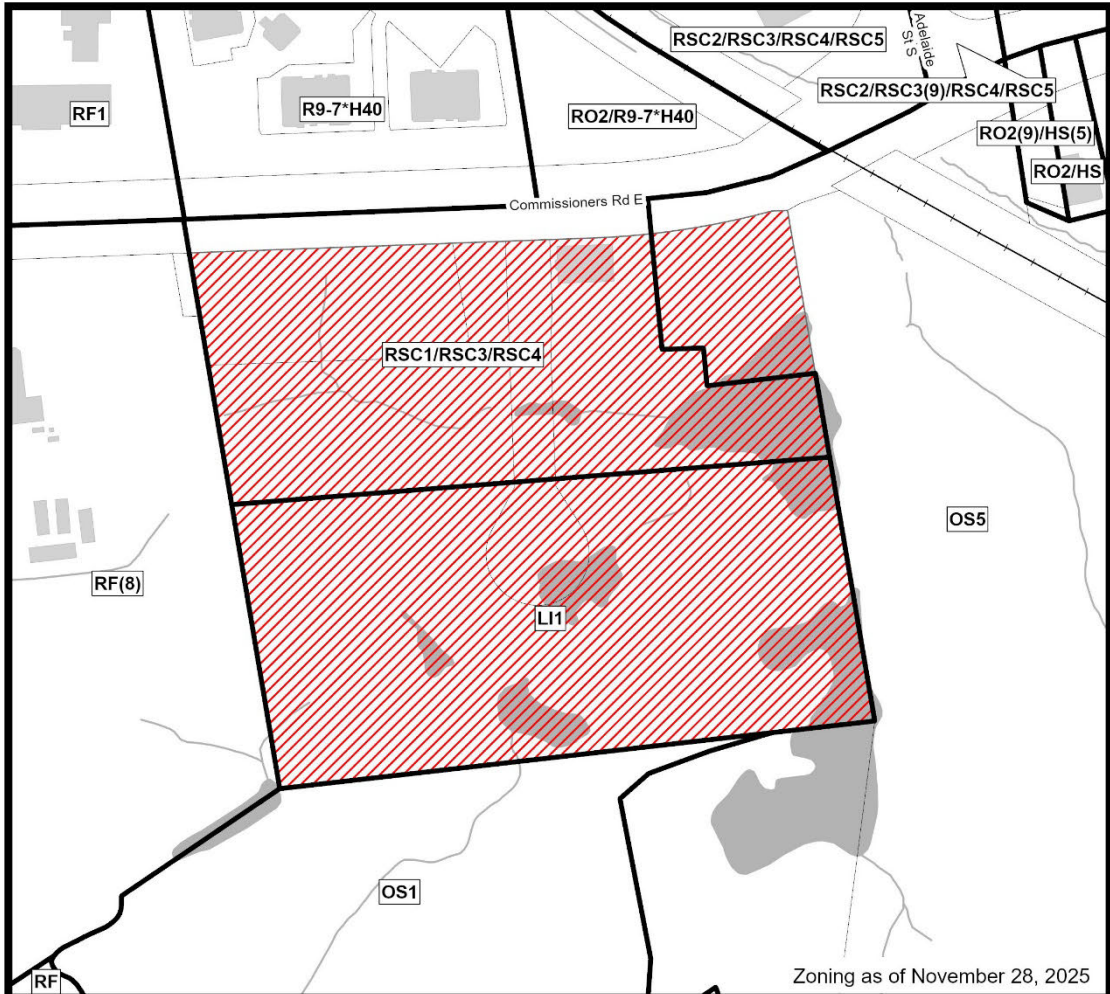
This is an excerpt from Planning & Development's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

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

Scale 1:30,000

 Meters

File Number: Z-25141
Planner: MV
Technician JI
Date: 2026/01/06



 **COUNCIL APPROVED ZONING FOR THE SUBJECT SITE: RSC1/RSC3/RSC4, LI1, OS5**

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

- | | |
|---|-----------------------------------|
| R1 - SINGLE DETACHED DWELLINGS | RF - REGIONAL FACILITY |
| R2 - SINGLE AND TWO UNIT DWELLINGS | CF - COMMUNITY FACILITY |
| R3 - SINGLE TO FOUR UNIT DWELLINGS | NF - NEIGHBOURHOOD FACILITY |
| R4 - STREET TOWNHOUSE | HER - HERITAGE |
| R5 - CLUSTER TOWNHOUSE | DC - DAY CARE |
| R6 - CLUSTER HOUSING ALL FORMS | |
| R7 - SENIOR'S HOUSING | OS - OPEN SPACE |
| R8 - MEDIUM DENSITY/LOW RISE APTS. | CR - COMMERCIAL RECREATION |
| R9 - MEDIUM TO HIGH DENSITY APTS. | ER - ENVIRONMENTAL REVIEW |
| R10 - HIGH DENSITY APARTMENTS | |
| R11 - LODGING HOUSE | OB - OFFICE BUSINESS PARK |
| | LI - LIGHT INDUSTRIAL |
| DA - DOWNTOWN AREA | GI - GENERAL INDUSTRIAL |
| RSA - REGIONAL SHOPPING AREA | HI - HEAVY INDUSTRIAL |
| CSA - COMMUNITY SHOPPING AREA | EX - RESOURCE EXTRACTIVE |
| NSA - NEIGHBOURHOOD SHOPPING AREA | UR - URBAN RESERVE |
| BDC - BUSINESS DISTRICT COMMERCIAL | |
| AC - ARTERIAL COMMERCIAL | AG - AGRICULTURAL |
| HS - HIGHWAY SERVICE COMMERCIAL | AGC - AGRICULTURAL COMMERCIAL |
| RSC - RESTRICTED SERVICE COMMERCIAL | RRC - RURAL SETTLEMENT COMMERCIAL |
| CC - CONVENIENCE COMMERCIAL | TGS - TEMPORARY GARDEN SUITE |
| SS - AUTOMOBILE SERVICE STATION | RT - RAIL TRANSPORTATION |
| ASA - ASSOCIATED SHOPPING AREA COMMERCIAL | |
| OR - OFFICE/RESIDENTIAL | "h" - HOLDING SYMBOL |
| OC - OFFICE CONVERSION | "D" - DENSITY SYMBOL |
| RO - RESTRICTED OFFICE | "H" - HEIGHT SYMBOL |
| OF - OFFICE | "B" - BONUS SYMBOL |
| | "T" - TEMPORARY USE SYMBOL |

CITY OF LONDON

PLANNING SERVICES / DEVELOPMENT SERVICES

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



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

FILE NO:

Z-25141

MV

MAP PREPARED:

2025/01/06

JJ

1:2,800

0 12.5 25 50 75 100

Meters