

April 23, 2021

Councilor Phil Squires
Chair of Planning and Environment Committee
Members of City Council
City of London,
300 Dufferin Ave.
London, ON N6A 4L9

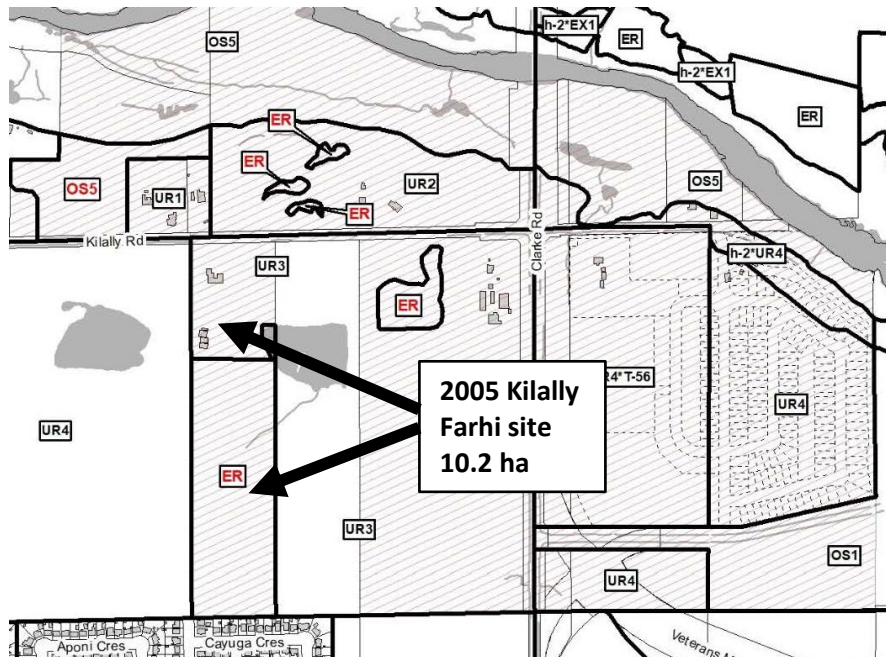
Attn: Councilor Phil Squire (Chair) PEC VIA: e-mail: psquire@london.ca

Re: City of London Application for an Amendment to the Official Plan and zoning Bylaw for the Kilally South ESA-1918 to 2304 and 2005 to 2331 Kilally Road- OPA & ZBA

FOR COUNCIL MEETING OF MAY 4, 2021

Dear Councilor Squires and City Council Members:

Farhi Holdings Inc. owns 10.2 ha (25.3 acres) at 2005 Kilally Road, south side west of Clarke Road. The subject City application proposes to designate and zone approximately 2/3 of the site to ENVIRONMENTAL REVIEW. This would change it from LOW DENSITY RESIDENTIAL in the 1989 Official (from the Kilally South Area Plan of 2007). Plan and from NEIGHBOURHOOD PLACE TYPE in the London Plan. See zoning map excerpt below.



Farhi Holdings asks that the Farhi lands be DEFERRED, in the same way that the easterly abutting Auburn lands at 2065 Kilally was DEFERRED. Farhi Holdings requests that the subject Farhi lands be removed from the ESA defined area and that the respective OPAs and Rezoning do not apply to the Farhi lands at this time.

The reasons for this request are as follows.

1. Farhi Holdings has reviewed their mail receipt and contends it did not receive the Notice of Public meeting at PEC through the mail and therefore missed out on the opportunity to make representation at PEC on April 19, 2021.
2. The hardship created by the City application is significant with approximately 85 single detached lots at risk with 2/3 of the property being zoned ER.
3. The London Plan requires additional studies at the time of application and therefore the City would not miss out on preserving natural heritage if it does exist on the lands.
4. **We understand that the easterly adjacent property at 2065 Kilally Road was removed from the ESA and the ER zoning. It is difficult to see the logic in keeping the subject Farhi Lands within the ESA as it is now a “sliver” of land separated from the larger ESA.**
5. We understand the background supporting information is essentially based on desk-top review which is very insufficient in view of the potential development loss. No one has asked Farhi Holdings for permission to access the property.
6. The site comprises partially a depleted aggregate pit. Often times in these cases rehabilitation of the lands for housing is seen as a excellent opportunity for growth and the supply of housing.
7. The KILALLY SOUTH SECONDARY PLAN prepared and approved in 2006-8 has not been addressed which placed the LDR and MMDR designations on the lands in the 1989 Official Plan.
8. We are completing our own analysis and review of the City’s consultants work and take issue with the methodology as well as the findings.
9. The possible continued decrease of recognizable 'developable lands' is a trend that will only impede directives of this Council regarding affordability.
10. The subject lands are on the westerly limits of the proposed ESA boundary and we suggest consideration be given to focusing ESA efforts along the Thames River north of Kilally Road.

In conclusion, we ask the City to exercise caution in approving such a significant application to impose significant environmental constraints on lands that have highly questionable natural heritage features, and that would be redesignated and rezoned to restrict lands for housing. Thank you.

Respectfully submitted,

Strik, Baldinelli, Moniz Ltd.

Planning • Civil • Structural • Mechanical • Electrical



Laverne Kirkness, BES, RPP, MCIP.

Principal Planner, Planning Division Manager

Encl.

cc. Farhi Holdings Ltd.

cc. George Kotsifas gkotsifa@London.ca

cc. Craig Smith crsmith@London.ca

cc. pec@london.ca.