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July 23, 2013

Planning and Environment Committee
City of London
300 Dufferin Avenue
London, Ontario N6A 4L9

Attention: Chair B. Polhill and Committee Members

RE: Land Needs Background Study: 2011 Official Plan Review (ReThink London) - Request for Inclusion in Urban Growth Boundary – 1620 – 1640 Fanshawe Park Road - J-Aar Excavating Ltd.

MHBC appeared before London Planning Committee in July 2007 on behalf of J-Aar Excavating to request consideration of their lands being included within the Urban Growth Boundary. Six years later, we are once again asking for consideration and continue to believe that there is merit in this request.

The lands in question are located on the north side of Fanshawe Park Road and to the east of Highbury Avenue. The majority of the lands (approximately 40 hectares) are currently licensed for gravel extraction. They are referred to as the Box Pit. Some rehabilitation of the pit is currently taking place where extraction has been completed. **(See air photo)**

The Official Plan currently shows the Urban Growth Boundary falling along the west and south property limits of the Box Pit. The lands are designated as Agriculture with an underlying extractive zoning. The lands immediately to the west and south are designated and zoned for residential purposes. Since last appearing before Planning Committee on this matter a significant amount of new residential development has occurred in the immediate area.

This property is adjacent to the Kilally North Area Plan. The Area Plan anticipated that existing collector roads would connect through this property and that the ultimate development of this property would effectively round out the area plan. **(See attached Area Plan)** When these surrounding lands were developed, water, storm and sanitary services were oversized to accommodate the Box Pit property so no additional infrastructure is required. The only exception would be that the northerly half of the site will likely drain to a new SWM pond on the property but all other municipal services are in place.

Upon review of the Land Needs Study, we believe that there is warranted demand for additional lands to be included in the UGB. The projections for intensification within the built areas of the City are very optimistic and do not appear to consider the limited amount of land available for such purposes. While the majority of high density residential development will likely occur within the built area, it is questionable whether significant amounts of low density residential will occur through intensification.

Further, the supply of residential units within the UGB also appears to be overstated. The staff report indicates that approximately 60,000 new housing units can be accommodated within the vacant land inventory as of 2011. In order to achieve these figures, residential densities within greenfield areas would have to be significantly higher than past practice and current trends. In short, we do not feel these figures have been thoroughly reviewed and verified.

It is our opinion that additional lands will need to be included within the UGB and that this property should be considered for the following reasons:

- The subject lands are relatively small and it is likely that the northerly half of the site will remain relatively undeveloped for SWM purposes and other open space uses. A limited amount of new development is being introduced within the UGB;
- The land use planning on adjacent parcels identifies a key secondary collector road connecting lands to the west and south through the subject lands. The construction of this collector road becomes increasingly compromised as extraction on the property continues thereby resulting in grades that are significantly lower than abutting lands;
- Further servicing of the lands through gravity sewers becomes increasingly difficult if the finished grades are lower than adjacent properties due to continued extraction;
- Existing infrastructure on surrounding lands has been designed and constructed to accommodate this property – significant monies have been spent in anticipation of these lands being developed;
- The inclusion of the Box Pit into the urban area of the City represents a minor rounding off of the urban growth boundary and is in conformity with intended land use planning for the area;
- The development of these lands will bring significant revenues while requiring minimal expenditure. The adjacent development has already constructed the necessary infrastructure to develop these lands.
- The continued extraction of gravel creates land use conflicts. The continued operation of the gravel pit is protected in accordance with Provincial Policy and therefore the onus is on adjacent developers to incorporate mitigative measures such as noise and dust warning clauses, phasing of development and construction of berms. Should J-Aar Excavating be allowed to proceed with development plans on their lands, these land use conflicts would no longer remain and such mitigative measures would no longer be necessary;
- Both the 2005 Provincial Policy Statement and the Official Plan contain policies to minimize land use conflicts and to create rehabilitation plans for pits and quarries that allow for an appropriate after-use. As noted previously, the continued operation of the Box Pit will limit the options for J-Aar Excavating to create a viable residential development.

It does not make sense to continue to extract gravel from the site for another 5 to 10 years and then have to haul new fill back to the site for development purposes. If the lands are to be developed as anticipated in the Official Plan and Kilally North Area Plan, then J-Aar must wind down their aggregate operations in the near future.

We believe it is in the best interests of the City to ensure that these lands remain viable for future development in accordance with the long term planning that has occurred. In order to do this, the lands should be incorporated into the urban growth boundary at this time such that J-Aar Excavating can make the necessary strategic planning for their rehabilitation plans.

We request your support and further direction to staff to consider this request for inclusion in the urban growth boundary.

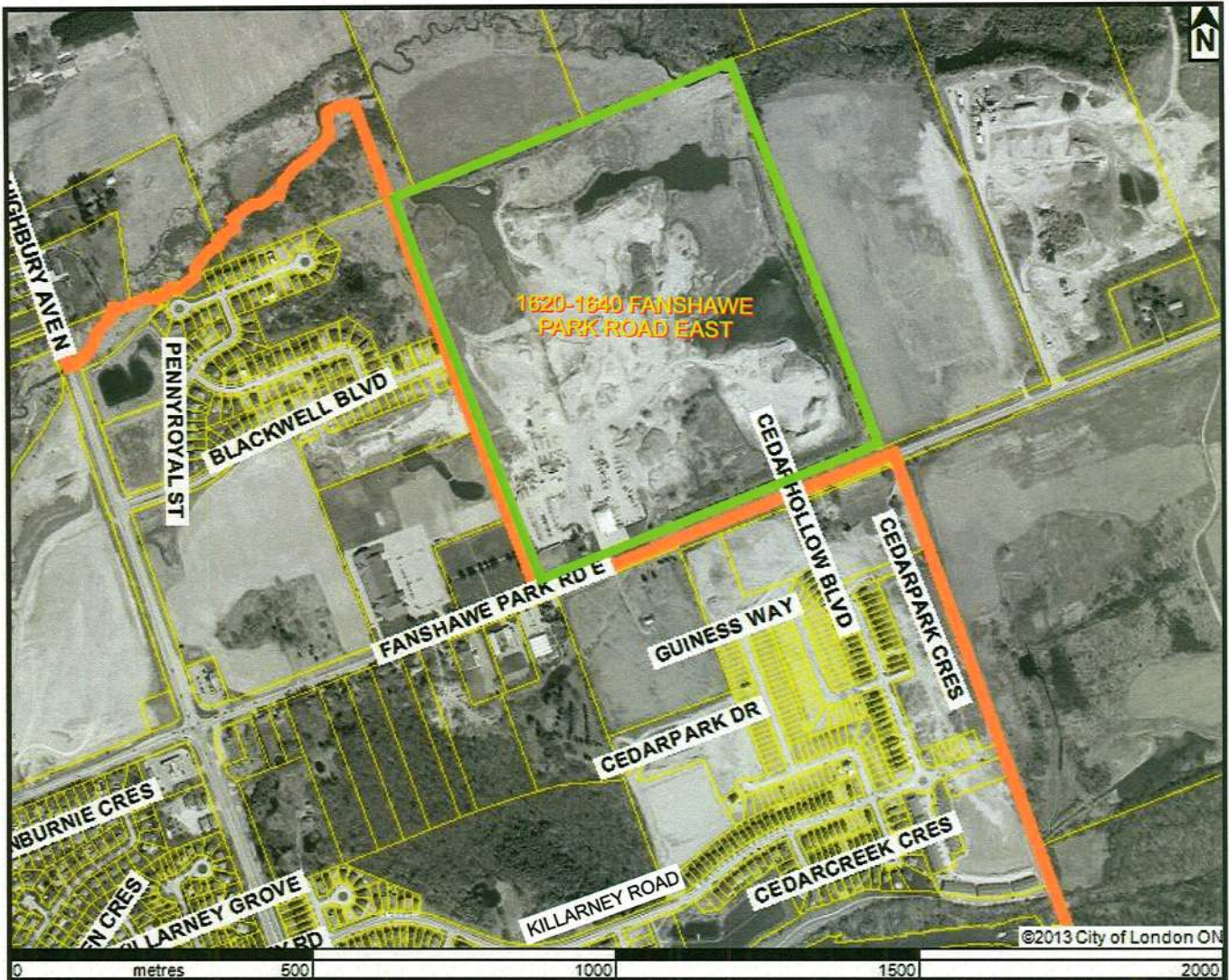
Yours truly,

MHBC

A handwritten signature in black ink, appearing to read "C. Wiebe".

Carol M. Wiebe, BES
Partner

cc Matt Falls, J- Aar Excavating



SOURCE: CITY OF LONDON INTERACTIVE DIGITAL MAPPING 2012 AERIAL PHOTO

-  SUBJECT LANDS
-  URBAN GROWTH BOUNDARY




**PLANNING
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& LANDSCAPE
ARCHITECTURE**
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LOCATION MAP

