

## Report to Planning and Environment Committee

**To:** Chair and Members  
Planning and Environment Committee

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

**Subject:** The London Plan Comprehensive Review: Preliminary  
Approach and Timeline

**Date:** February 21, 2023

## Recommendation

That, on the recommendation of the Director, Planning and Development, the following report regarding a preliminary approach and framework of The London Plan Comprehensive Review **BE RECEIVED** for information.

## Executive Summary

In response to recent economic, population, and housing trends that are anticipated to continue over the long-term, it is an appropriate time to undertake a comprehensive review of the City's official plan, The London Plan. The purpose of this report is to provide a preliminary overview of the upcoming municipal comprehensive review process and next steps.

## Linkage to the Corporate Strategic Plan

The Comprehensive Review of The London Plan directly aligns with the "Building a Sustainable City" Strategic Area of Focus of Council's strategic plan. This alignment includes ensuring London's infrastructure is built, maintained, and operated to meet the long-term needs of our community; and, that London's growth and development is well planned and sustainable over the long term.

## Analysis

### 1.0 Background Information

#### 1.1 What is a Comprehensive Review?

The *Planning Act* requires that every municipality periodically review their official plan to ensure it conforms with provincial plans, has regard for matters of Provincial Interest, and is consistent with policy statements, including the Provincial Policy Statement (PPS). The legislation also directs that such reviews be undertaken within the first ten (10) years of a new official plan coming into effect, and then within every five (5) years thereafter.

The London Plan has not yet been in force for ten (10) years and as such the City is not obligated to undertake a review; however, given recent population and housing trends and legislative changes, the need to undertake a review of the Plan is considered appropriate at this time. Under the PPS, an official plan review enables the use of a comprehensive review which is the mechanism to ensure there is sufficient land available over the long-term to accommodate projected growth.

A Comprehensive Review is both a policy and growth management review. In addition to policy changes associated with updates to legislation, the review also requires an evaluation of lands to meet projected needs, as defined in the PPS. The PPS defines a Comprehensive Review as follows:

- An official plan review that is initiated by a municipality.
- Based on a review of population and employment projections.

- Considers alternative directions for growth or development; and determines how best to accommodate that development while protecting provincial interests.
- Accommodates projected growth and development through intensification and development; and considers physical constraints to accommodate proposed development within the existing urban growth boundary (UGB).
- Is integrated with planning for infrastructure, public service facilities, water resource planning, and water/wastewater services; and
- Considers cross-jurisdictional issues.

In accordance with Section 26 of the *Planning Act*, the Ministry of Municipal Affairs and Housing is the approval authority for a Comprehensive Review. Ministry, stakeholder, and public consultation will be an important component of this review.

## **1.2 Proposed Approach and Scope of the Comprehensive Review**

The proposed approach is to maintain the Vision, Goals, Key Directions and organizing structure of the recently OLT-approved version of The London Plan, while ensuring that The London Plan policies implement that structure. The proposed process would include broad input from the Ministry, industry and community stakeholders, and the public, while also satisfying legislated technical requirements related to land needs and the City's ability to accommodate projected growth in population, housing, and employment.

The proposed approach and scope are anticipated to include the following, subject to consultation with the Ministry and public:

### 1. Review Population and Employment Projections (2022)

The first step is for a municipality to undertake projections for growth, consistent with provincial guidelines. These projections include population, housing, and employment lands for non-residential uses. This task has been completed. A 2021-2051 Growth Projections study, prepared by Watson and Associates, was approved by Council in December 2022.

### 2. Confirm Approach and Scope (Q1 2023)

Prior to updating an official plan and undertaking a municipal comprehensive review, the *Planning Act* requires consultation with the Ministry and that a special public meeting of council be held to discuss the revisions that may be required. Ministry consultation has begun and a public open house will be held in early March to present the project to the public and seek input on the approach and scope. The required special meeting to initiate the project is anticipated on April 11, 2022 at Planning and Environment Committee to seek broad public input on the scope and terms of this project.

### 3. PPS Conformity Exercise (Q1-Q4, 2023)

Consistent with the *Planning Act*, a review of The London Plan is required to ensure it conforms with Provincial Legislation and the Provincial Policy Statement, 2020.

Potential matters to review include PPS policies amended in 2020 that now require municipalities to maintain the ability to accommodate a minimum of 15 years of residential growth as well as allow municipalities the ability to identify sufficient lands to accommodate growth for a time horizon of up to 25 years. The London Plan currently identifies a horizon of 20 years. This means that the Urban Growth Boundary (UGB), which delineates lands planned for urban uses versus lands planned for agriculture and other rural uses, is to be planned to accommodate 20 years of projected growth. While the 20-year horizon currently used is consistent with the PPS, the City can now consider accommodating up to 25 years of projected growth. This policy review will be brought forward early in the process for Council direction.

Through the conformity review, staff may determine that additional policy matters may need to be reviewed and amended. A public consultation process will be associated with any proposed amendments to The London Plan.

#### 4. Land Needs Assessment: Land Capacity to Accommodate Supply (Q1-Q4, 2023)

Policy 1.1.2 of the PPS states that 'within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas.' As such, urban lands must be inventoried and evaluated for their ability to accommodate projected growth. This exercise takes the housing demand that is determined through the forecast and applies it to the supply. Supply will be determined by considering opportunities for housing units to be created either through intensification within the existing built-up area or through development on designated growth areas, (i.e., greenfield sites) identified in The London Plan for urban uses.

Building on previous master planning work, a review of existing and planned municipal services will be undertaken to confirm that infrastructure is available to accommodate growth. This work will also be beneficial as it would form the basis for reviewing the infrastructure component of an alternative directions for growth exercise, if required.

A land needs assessment presenting the findings and providing residential intensification target options for Council consideration is anticipated by the end of 2023. Should any land supply shortfall be determined, the allocation of additional supply would then be considered through the review of alternative directions process discussed below.

##### 4a. Employment Area Review (Q1-Q4, 2023)

Parallel with this work, an Employment Area Review will be undertaken. Under the PPS, a comprehensive review also enables the review industrial land needs and the opportunity to convert Employment (industrial) lands to non-employment uses, provided the evaluation of the lands determines that they are not required for employment purposes over the long-term and that there is a need for the conversion (PPS s. 1.3.2.4). This process will include identifying employment land needs, reviewing the function of existing employment areas, receiving conversion requests from landowners and reviewing requests based on established criteria. Any recommended conversions and/or land supply shortfalls would be incorporated into the land needs assessment noted above for Council consideration.

#### 5. Alternative Directions for Growth, if required (Q4,2023 – Q2, 2024)

If the land needs analysis determines there is insufficient land to accommodate projected growth over the planning horizon, then alternative directions for growth can be investigated through a potential urban growth boundary (UGB) expansion. Once a shortfall is confirmed, the first step would be to present criteria for Council consideration that would be used to evaluate potential urban expansion areas against. A review of alternative directions would then be undertaken, and the findings and recommendations presented for Council consideration. The criteria would be developed consistent with the PPS. Matters to be evaluated for each proposed direction for growth may include, but are not limited to:

- logical extensions of the existing settlement area;
- servicing complexity and costs that build on the municipal servicing analysis completed as part of the Land Needs Assessment phase;
- compliance with Minimum Distance Separation (MDS) between existing livestock operations and new urban land uses; and
- impacts on prime agricultural areas and agricultural operations.

Requests to be included in the UGB may also be submitted from interested landowners during this process and will be evaluated based on the same criteria.

## 6. The London Plan Amendments, if required (Q2, 2024)

Any amendments to implement Council’s decision on the alternative directions for growth exercise would occur next as the existing policies of The London Plan and mapping may only be changed through an amendment to The London Plan. An amendment to The London Plan must demonstrate consistency with the PPS. Public engagement and notice, including a statutory public participation meeting before the Planning and Environment Committee, are also required before Council may amend mapping or relevant policies. The timeline and matters to be addressed in any subsequent London Plan Amendments will be contingent upon the results of the “Alternative Directions for Growth” analysis.

The Table below summarizes timelines for key activities of the Comprehensive Review.

Key Activities	2022	2023				2024	
		Q1	Q2	Q3	Q4	Q1	Q2
1. Review Population and Employment Projections	<input type="checkbox"/>						
2. Confirm Approach and Scope		<input type="checkbox"/>					
3. PPS Conformity Exercise		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4. Land Needs Assessment – Land Capacity		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4a. Employment Areas Review		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
5. Alternative Directions for Growth (if required)					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. The London Plan Amendments							<input type="checkbox"/>

### 1.3 Consultation Opportunities

Before revising The London Plan through a comprehensive review, the City is required to consult with the Ministry and Agencies. The Ministry is the approval authority for the comprehensive review. A special public meeting is also required regarding Amendments to the Plan that may be required. Prior to the special meeting, Staff will be holding a public open house to present information to the general public and solicit feedback.

Stakeholder and public consultation will occur throughout the Comprehensive Review process, including information meetings and the special public meeting of Council. Consultations will include public meetings as well as meetings of identified stakeholder committees or advisory groups.

Reports to Council will be targeted at least quarterly and may include subjects such as: Terms of Reference public meeting, evaluation criteria for conversions of employment lands; policy conformity review results; vacant land inventory update results; intensification and redevelopment capacity analysis and associated intensification targets; and the recommendation report regarding results of the land needs analysis.

Also, if additional land is required to meet projected demand, then a public review process to amend The London Plan will be undertaken. If a UGB expansion is deemed warranted, then public meetings will be held regarding evaluation criteria and analysis of lands for potential expansion of the UGB, which are ultimately approved by the Ministry of Municipal Affairs and Housing.

## 2.0 Potential for Further Provincial Legislation Changes

Proposed project timing is based on the current legislation and provincial policy framework. It is important to note that the Province is also currently undertaking a

review of the PPS. The Province has stated that it is considering integrating the PPS and the Growth Plan for the Greater Golden Horseshoe into one policy document (note: the City of London is currently not subject to this Growth Plan).

At the time of writing of this report, the Province had not provided specific changes being considered, but has stated that this may include possible changes to directions regarding various municipal land use actions, including Urban Growth Boundary expansions, employment area conversions, rural housing development, intensification policy, natural heritage policy, and/or infrastructure supply directions.

All of the above may present possible implications for the reviews or amendments that are required as part of the City's Comprehensive Review. If the Provincial Government makes further changes to the legislative framework governing land use planning, or to the requirements for a Comprehensive Review, then the deliverables or timelines identified may be impacted in order to incorporate the legislative changes through this comprehensive review process.

## **Conclusion**

In December 2022, Council endorsed 2021-2051 growth projections for London. This included projected population growth, employment growth, housing units, and non-residential floor space growth. Now that projections are approved, the City is in a position to review and update The London Plan to ensure the policy approach is meeting the Key Directions and goals of the plan, to ensure consistency with Provincial policies, and to align The London Plan policies with recent growth and development trends that have occurred since approval of The London Plan.

In accordance with Section 26 of the *Planning Act*, the Ministry of Municipal Affairs and Housing is the approval authority for a Comprehensive Review. The City will consult with the Ministry and public to determine the matters to be addressed in the review. Following an initial consultation with Ministry partners, a public open house will be held to present the project to the public and seek input on the approach and scope. The required special meeting to formally initiate the project is anticipated to be held April 11, 2022 at Planning and Environment Committee to seek broad public input and Council direction on the scope and terms of this project.

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