

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: Comprehensive Review of The London Plan: Terms of Reference
Public Participation Meeting

Date: April 11, 2023

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions **BE TAKEN** with respect to the London Plan Comprehensive Review:

- a) That Civic Administration **BE DIRECTED** to initiate the Comprehensive Review, based on the Terms of Reference attached hereto as Appendix 'A'; and
- b) That the Terms of Reference attached hereto as Appendix "A" **BE CIRCULATED** to the Ministry of Municipal Affairs and Housing, Prescribed Agencies, and to development and community stakeholders.

Executive Summary

The preliminary approach and timeline of the Comprehensive Review of The London Plan was outlined in a February 21, 2023 report to the Planning and Environment Committee. The purpose of this report is to present Terms of Reference for the Comprehensive Review. This report also identifies public and stakeholder feedback on the Comprehensive Review that has been received to date. Additional public input on the scope and matters to be addressed in the comprehensive review is being sought through the public participation meeting associated with this report.

The *Planning Act* requires that a special public meeting be held to discuss the revisions that may be associated with a review of the municipal official plan. The public meeting associated with this report constitutes a meeting required under s. 26(3) of the *Planning Act*.

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.

Climate Emergency

On April 23, 2019, Council declared a Climate Emergency. A Climate Emergency Action Plan has been developed that provides a city-wide approach to addressing three main goals of mitigation, adaptation, and equity. The Climate Emergency Action Plan identifies the comprehensive review of The London Plan as an opportunity to consider how well policies are aligned with the climate emergency response. Specifically, the Climate Emergency Action Plan identifies that during the comprehensive review the city should "Incorporate the detailed review of intensification targets, permitted heights, and other measures of intensity in relation to growth trends" (Area of focus 3, workplan item #2). This and other implications on the climate response will be addressed in the comprehensive review of The London Plan.

1.0 Comprehensive Review

Municipalities are mandated under the *Planning Act* (section 26) to periodically update their official plans. The purpose of these official plan reviews is to ensure municipal official plans conform with provincial plans and policies.

Official plan reviews under the *Planning Act* also enable municipalities to undertake a “Comprehensive Review,” as defined in the Provincial Policy Statement (PPS). PPS section 6.0 defines a Comprehensive Review for the purpose of completing a land needs review of its urban growth boundary or considering the conversion of employment lands as including the following:

- A 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 redevelopment; and considers physical constraints to accommodating the 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.

The Comprehensive Review is the only means by which the City can consider an expansion of its Urban Growth Boundary, subject to insufficient land being available to accommodate planned growth in its current UGB. The Comprehensive Review also provides an opportunity for the City to evaluate Employment Lands (i.e. Industrial Lands) for the purposes of conversion to other non-Employment Place Types.

1.1 Scope of Comprehensive Review

Further to the February 21, 2023 report to Planning and Environment Committee, the proposed Terms of Reference (Appendix ‘A’) serve to outline the scope of work, define general tasks, and identify the sequence and anticipated timing. It is anticipated that the work plan may be modified, as required, based on public input or any changes in Provincial legislation.

The intent for this Comprehensive Review is to limit its scope to the Land Needs Assessment and related policies. Policy 73 of The London Plan provides a framework for the evaluation of land requirements to accommodate forecasted growth. The three ways in which growth is accommodated are: through intensification within existing urban area; the development of vacant, designated lands within the existing UGB; and, if required, the identification of lands suitable for urban area expansions to accommodate community and industrial growth needs.

1.2 Scope of Policy Conformity Exercise

The goal of the policy review component of the Comprehensive Review is to ensure The London Plan policies conform with Provincial policy, as well as ensure that the Vision, Goals, Key Directions, and organizing structure of the recently OLT-approved version of The London Plan are maintained. The scope of policy matters proposed to be reviewed in this Comprehensive Review is reflective of this objective. The following policy matters are intended to be reviewed:

- The ‘Planning Horizon’, which is the number of years’ worth of growth that the Plan accommodates; and

- The ‘Intensification Target’, which is the proportion of new development targeted to be built within the Built Area Boundary, or the lands substantively built-out at the time The London Plan was approved by the Province in 2016.

1.3 Recent Growth in the City

The London Plan was approved by the Province in December 2016. It was appealed at the time of its approval. The London Plan came into force in stages, with decisions received from the Ontario Land Tribunal (OLT) following each phase of hearings. The final phase of city-wide appeals was resolved in May 2022. The Land Needs Study that was the basis of The London Plan’s growth management approach was completed in 2012 and was based on 2011 census data.

There have been significant changes to the local population, economy and employment since The London Plan was approved by the Province. Employment changes include increased prevalence of remote work and hybrid arrangements. The period since 2016 also demonstrated a market shift to higher density housing forms being constructed, with medium-density and high-density forms predominating. This time period has also showed a significant increase in the city’s population growth rate.

The economic, population, and housing trends are anticipated to continue, and warrant the review of whether there is an adequate supply of designated land (in Place Types of The London Plan) to meet the projected growth in population, employment, and housing.

1.3.1 Land Needs Assessment (LNA)

The LNA is an evaluation of the existing land supply against the projected demand based on growth in employment and population over the life of the plan. The LNA will take into consideration any policy changes associated with this review, including potential changes to the intensification target.

The Land Needs Assessment will identify the capacity of the existing urban area (i.e. intensification), as well as update the City’s vacant land inventory, which general identifies “greenfield”, vacant, and underutilized sites within the existing UGB. The key steps associated with the LNA are identified in the Terms of Reference, attached as Appendix ‘A’.

One significant aspect to note in a LNA is the potential conversion of Industrial Place Type lands to non-Industrial uses. The Comprehensive Review is the main means by which a municipality can convert Employment Lands to other uses. PPS section 1.3.2.4 states:

Planning authorities may permit conversion of lands within employment areas to non-employment uses through a comprehensive review, only where it has been demonstrated that the land is not required for employment purposes over the long term and that there is a need for the conversion.

In some exceptional circumstances conversions may occur outside of the Comprehensive Review process; however, separation and mitigation of sensitive land uses like residential must be maintained, as well as maintaining and not adversely affecting the overall viability of the existing employment area.

More detailed criteria for the evaluation of potential conversion of Industrial lands will be brought forward in a subsequent report to the Planning and Environment Committee. A public meeting to solicit landowner requests for their properties to be evaluated by the City for potential conversion will also take place at the same Committee meeting.

2.0 Public Input

An initial Community Information Meeting/Public Open House was held on March 9, 2023, at City Hall. Community meetings and public participations meetings before Council will continue to be held throughout the various stages of the Comprehensive Review.

The initial community meeting sought input on preliminary questions being asked as the basis for the Comprehensive Review. Approximately 15 members of the public attended this open house, including development industry stakeholders and community members.

Preliminary questions being asked by Civic Administration included:

- Is the current intensification target of 45%, with 75% of which being directed to the Primary Transit Area, appropriate for 'inward and upward' growth;
- Should the current 20-year planning horizon be revised (up to 25 years);
- Should certain 'Employment Lands' (Industrial lands) be converted to permit other land uses (Place Types);
- Are there sufficient lands to meet projected needs over the planning time horizon; and
- What if there are insufficient lands to meet needs of projected growth?

Themes and questions from the community meeting discussion included:

- Are there sufficient servicing and land use permissions to accommodate the 45% intensification target in the 2016 Built Area Boundary?
- Is market interest sufficient to meet the intensification target?
- It will be important for ReThink Zoning to update the Zoning By-law to implement the policy framework of The London Plan, but in the meantime, Zoning applications are required for intensification that conforms with the Plan.
- Climate emergency and agriculture needs should be recognized and factored into the analysis. The legislation and Provincial policy focuses on urban land needs for outward urban growth.
- There are relative merits of a shorter or longer planning horizon (with fewer or more years of projected population required to fit within the urban area);
- Would Council be willing to remove or replace lands in the current Urban Growth Boundary, regardless of whether an expansion of the UGB is warranted, if they have not proceeded to develop in an established timeline?
- Does an employment land conversion require landowner consent?
- Can employment land conversions be considered site-by-site or must it include larger areas?

More detail on public comments and responses from Civic Administration are identified in Appendix 'B' to this report.

Conclusion

Provincial legislation and policies of The London Plan provide opportunity for Council to review The London Plan. The legislation enables the City to undertake a 'Comprehensive Review' as defined by the Provincial Policy Statement. This Comprehensive Review under the PPS is a Land Needs Assessment (LNA). The LNA determines if there is enough land designated in existing urban areas to accommodate the projected growth in employment, population, and housing over the planning horizon of the Plan.

The proposed review will also evaluate The London Plan's policy conformity with Provincial legislation. The structure of the recently OLT-approved Plan is intended to be maintained and The London Plan policies proposed to be reviewed are those that will inform the Land Needs Assessment.

Subsequent reports will seek Council's direction on the Planning Horizon, Intensification Target, and provide landowners an opportunity to request Employment Land sites and areas be evaluated for potential conversion to other land uses.

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March 16, 2023
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Appendix A: London Plan Comprehensive Review Terms of Reference

1. Comprehensive Review Tasks

Below are identified tasks required to complete the Comprehensive Review, based on the current legislative context:

a) Review Population and Employment Projections

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. The “reference scenario” projection was approved for use as the basis of the Comprehensive Review.

Deliverable: Growth Projections Study 2021-2051 (completed Q4, 2022)

b) Confirm Approach and Scope

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. A public community meeting was held on March 9, 2023 to present the project to the public and seek input on the approach and scope. The required special meeting to initiate the project is held on April 11, 2023 at Planning and Environment Committee to seek broad public input on the scope and terms of this project.

Deliverable: February 21, 2023 (Approach) and April 11, 2023 (Terms of Reference) reports to Council.

c) Policy Review Exercise

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. Matters to review include the “Planning Horizon” of The London Plan, and the “Intensification Target”.

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.

i. Planning Horizon

The timeframe of an official plan is known as a “Planning Horizon”. The Provincial Policy Statement (PPS) was amended in 2020 and now requires 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. Specifically, PPS section 1.1.2 states:

Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of up to 25 years [emphasis added].

The London Plan is consistent with the PPS as it 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.

Deliverable: Report to Council, targeted for Q2, 2023.

ii. Intensification Target

A target of The London Plan is for 45% of new residential development to be achieved through intensification within the Built-Area Boundary (BAB) (policy 81). The BAB delineates lands that were substantively built out at the time of approval of The London Plan (i.e. by 2016). The BAB is a “snapshot in time” and is used for London Plan policy and development monitoring. The BAB does not change during the life of the Plan.

The London Plan approach is consistent with Provincial Policy Statement, which directs cities to establish and implement minimum targets for intensification and redevelopment within their built-up areas (PPS 1.1.3.6).

The Primary Transit Area (PTA) is a geographic subset of the BAB. It is an objective of The London Plan for 75% of the 45% intensification target to be achieved within the PTA area (i.e. almost 34% of new development as intensification within the PTA and 11% in the BAB but outside the PTA). Municipal infrastructure must also be planned consistent with these intensification targets.

The Comprehensive Review asks whether the current intensification targets of The London Plan are appropriate to direct new development in a manner that achieves “inward and upward” growth of the city.

Sites and areas within the existing PTA and BAB will be evaluated for potential infill, intensification and redevelopment, consistent with the uses, intensities and forms permitted in Place Types of The London Plan.

Any change to intensification target policies will be applied to the Land Needs Assessment and assumptions regarding the capacity of the current built area to accommodate growth.

Figure 1 (below) shows a map of the Primary Transit Area, 2016 Built Area Boundary, and Urban Growth Boundary.

**CITY OF LONDON
PRIMARY TRANSIT AREA, URBAN GROWTH BOUNDARY
& BUILT AREA BOUNDARY**

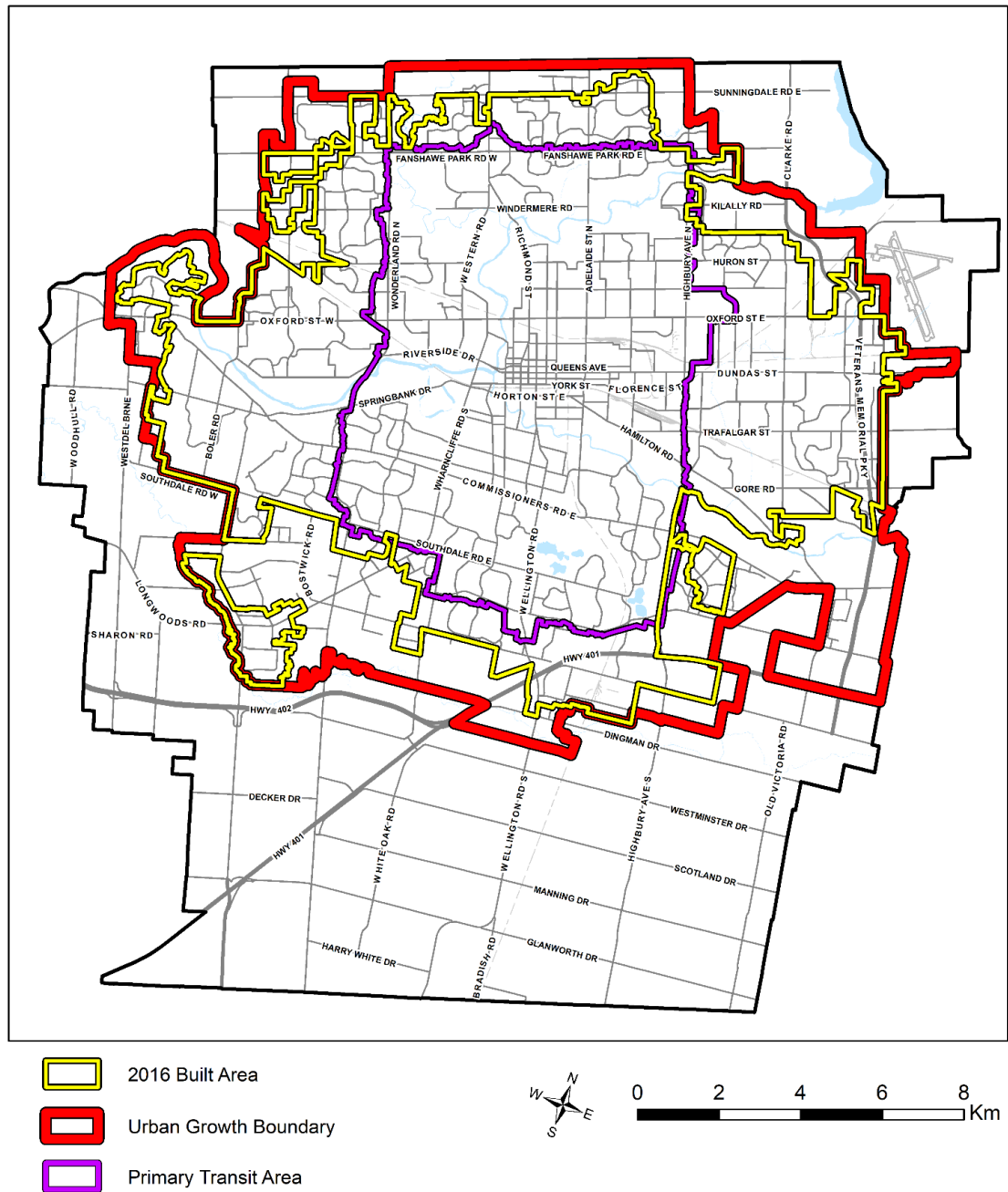


Figure 1 – Map of the Urban Growth Boundary, Built Area Boundary, and Primary Transit Area

Deliverable: Report to Council, targeted for Q4, 2023 (Capacity review).

d) Land Needs Assessment

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”. Designated growth areas are vacant “greenfield” areas located outside of the BAB but within the Urban Growth Boundary. Greenfields are planned for growth and urban land uses.

Existing urban lands must be inventoried and evaluated for their ability to accommodate projected growth in population. This exercise takes the housing demand that is determined through the 2021-2051 Growth Projections Study

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 greenfield sites identified in The London Plan for urban uses.

In sum, the steps in the Land Needs Assessment include:

- Determining projected growth (completed, December 2022);
- For vacant and underutilized urban sites: preparing methodology and analyzing capacity of current urban lands to accommodate growth through infill, intensification and redevelopment;
- Factoring in BAB Intensification target to allocations;
- Factoring in Place Type permissions, and trends in density and forms of development for greenfield areas;
- Applying the 'Planning Horizon' for number of years' growth;
- Evaluating potential conversion of industrial lands (see next section) towards inventory of land supply;
- Updating City's Vacant Land Inventory to reflect current land use permissions. This update is concurrent with other steps.

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.

Deliverable: Completed LNA with report to Council targeted for Q4, 2023.

e) Employment Area Review (Industrial Land Needs Assessment)

Parallel with the non-Industrial Land Needs Assessment, a review of Employment Areas will be undertaken. Under the PPS, a comprehensive review also enables the review of 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 based on projected employment growth from the Growth Projections Study. This includes employment growth projections and floor space per worker (FSW), as well as reviewing the function of existing employment areas. Requests from landowners to evaluate their lands for potential conversion (to non-Industrial uses) will be evaluated against established criteria.

Deliverable: Any recommended conversions and/or land supply shortfall identified would be incorporated into the overall LNA report to Council, targeted for Q4, 2023.

f) Servicing Review

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 within the planning horizon of The London Plan. Initiated in parallel to the Land Needs Assessment and the City's update of the Vacant Land Inventory, the servicing review will identify high-level servicing needs and the current servicing capacity within the Built Area Boundary and Greenfield area. This work will be beneficial as it would form

the basis for reviewing the infrastructure component of an alternative directions for growth exercise, if required.

Deliverable: Reports to Council concurrent with the intensification target/built area capacity review (Q4, 2023), and with the Alternative Directions for Growth review if required (Q2, 2024)

g) Alternative Directions for Growth (if required)

If the land needs assessment 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.

If 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 and policy 76 of The London Plan.

Also, consistent with the Climate Emergency Action Plan (CEAP) and City's Climate Emergency declaration, a climate lens will be applied to a review of the Alternative Directions for growth. This will include an analysis of climate adaptation and mitigation measures associated with a UGB expansion.

Matters to be evaluated for each proposed direction for growth may include, but are not limited to:

- Logical extensions of the UGB that extends an existing neighbourhood or sufficient land to accommodate a complete new neighbourhood;
- Servicing complexity and costs that build on the municipal servicing analysis completed as part of the Land Needs Assessment phase;
- Optimizing existing and planned infrastructure with logical integration with the Growth Management Implementation Strategy (GMIS);
- Compliance with Minimum Distance Separation (MDS) between existing livestock operations and new urban land uses; and
- Impacts on prime agricultural areas and agricultural operations;
- Protection of components of the Natural Heritage System;
- Climate Emergency mitigation and adaptation; and
- Market demands for certain types of housing, commercial, or industrial uses that are not well met by available land supply.

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.

Deliverable (if required): Report to Council Q2, 2024

h) The London Plan Amendments

Any amendments to implement Council's decision on the Alternative Directions for growth exercise would follow, because 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.

Additional amendments will be required for the growth projections identified in policy 67 (Growth Forecasts) of The London Plan, as well as other policy or mapping amendments that may be identified through the Comprehensive Review process.

Deliverable: Report to Council Q2, 2024

2. Timeline

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. Policy 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. Servicing Review			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Alternative Directions for Growth (if required)					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. The London Plan Amendments (if required)							<input type="checkbox"/>

The timeline for the Comprehensive Review is based upon the current provincial legislation and Provincial Policy Statement, 2020. If there are changes to Provincial Legislation, Ontario Regulations, or the Provincial Policy Statement, 2020 (PPS), there may be impacts to the proposed timing or deliverables required to complete the Comprehensive Review.

Appendix B: Public Consultation (March 9, 2023 Public Meeting)

A community information meeting/public open house was held at City Hall on March 9, 2023. The purpose of the meeting was to solicit initial feedback on the range of issues and questions being asked as part of the Comprehensive Review of The London Plan. Below are tables identifying the comments received at the public meeting and responses from Civic Administration. Additional public and stakeholder commentary will continue to be considered throughout the Comprehensive Review process.

1. Intensification Target

Comment Received	Civic Administration response
<ul style="list-style-type: none"> Is there sufficient infrastructure and land use permissions (height/density) to meet the 45% intensification target within the 2016 Built Area Boundary. 	<p>The servicing base line is to be determined as part of a servicing review. This would identify the order of magnitude of upgrades (if required) to align servicing with planned uses.</p> <p>The London Plan provides opportunity for many forms of intensification, throughout various Place Types. The Land Needs Assessment (LNA) will also include review of the intensification and redevelopment capacity of the existing Built Area Boundary 2016, based on permitted uses of The London Plan.</p>
<ul style="list-style-type: none"> What if the market does not demand intensification sufficient to meet the 45% target over the life of the Plan. 	<p>The Intensification Target is for the purposes of monitoring development activity since 2016 and aligning infrastructure requirements. This purpose is consistent with PPS requirements for intensification targets.</p>
<ul style="list-style-type: none"> Recent development (i.e. outside the Built Area Boundary) are often denser than earlier developments in the city. 	<p>Noted that as part of the LNA, a review of density assumptions in greenfield areas will occur in order to update the Vacant Land Inventory (VLI).</p>
<ul style="list-style-type: none"> Will redesignations or changes to land uses or intensities be considered in this Comprehensive Review. 	<p>The structure of the recently OLT-approved version of The London Plan is intended to be maintained. Redesignations/conversions of lands may occur through the Industrial land review of the LNA.</p>
<ul style="list-style-type: none"> Are minimum densities required for London Transit Commission (LTC) ridership considered in reviewing densities of land use. 	<p>Development trends towards greater density and more intensive forms of development will be included in the LNA and in the update to the VLI.</p>
<ul style="list-style-type: none"> Suggestion that areas planned for higher intensity permissions (e.g. Transit Village and Rapid Transit Corridor Place Types) should be “pre-zoned” to educate public and encourage development that conforms to policies of The London Plan. 	<p>Through the ReThink Zoning project, a new Zoning By-law is being written that implements the policy permissions of the new official plan (The London Plan). Upon completion of the new Zoning By-law, Zoning regulations will align with policies across the city, including permissions for more intensive land uses in locations where intensification is planned.</p>
<ul style="list-style-type: none"> Suggestion that the intensification policies should make further clarifications, especially if the target is increased above 45%. 	<p>This will be considered by Staff, noting that the ReThink Zoning project is preparing a new Zoning By-law that will implement policies of The London Plan.</p>

2. Planning Horizon

Comment Received	Civic Administration response
<ul style="list-style-type: none"> The City's annual Growth Management Implementation Strategy (GMIS) schedules outward infrastructure investments, so GMIS functions to prevent "leapfrog" development. 	<p>Staff recognize that the GMIS process schedules outward extension of municipal services.</p>
<ul style="list-style-type: none"> Longer planning horizon and larger UGB would still build out in same manner. 	<p>Staff noted that a larger projected population must be accommodated in a longer planning horizon (i.e. five more years of projected population in a 25 year horizon versus a 20 year horizon).</p> <p>Staff also noted that past experience in previous Comprehensive Reviews showed that a larger UGB was less nimble to respond to changes in market direction/demands for growth in different areas of the city. Example provided is that if one quadrant of the city builds out faster than another, the legislation still requires a calculation of the entire land area available within the Boundary. So, a larger boundary may not be as able to respond to shifts in market's interest and different rates of development in different areas of the city. A shorter horizon with a smaller boundary could be adjusted to match changes in market demand more easily.</p>
<ul style="list-style-type: none"> Suggestion that larger UGB boundary provides 'flexibility' to development industry, as Council is not expected to undertake Comprehensive Reviews more often than necessary. 	<p>Comment noted.</p>
<ul style="list-style-type: none"> Suggestion that the UGB is as 'nimble' as Council wishes it to be: Council could direct a Comprehensive Review be undertaken at any time, and so Council can add lands, remove lands, and adjust the Urban Growth Boundary at any time. 	<p>A larger boundary could be adjusted, or lands removed without the need for an expansion. This would be subject to Council's direction during a Comprehensive Review process. This is also consistent with policy 75 of The London Plan.</p>
<ul style="list-style-type: none"> Will a Climate Emergency lens be applied to the Comprehensive Review. 	<p>A climate lens will be applied, consistent with the Climate Emergency Action Plan (CEAP).</p>

3. Employment Land Conversions (Industrial Land Conversions)

Comment received	Civic Administration response
<ul style="list-style-type: none"> Industrial review needs to ask both: is an area suitable for Industrial uses long-term, and, if it is going to be converted to non-Industrial uses then what other land uses would the area be appropriate for. 	<p>For the Industrial Lands LNA and conversion evaluation, the suitability of lands for (1) future Industrial use and (2) suitability for alternative land uses will both be evaluated. Evaluation criteria will reflect both considerations.</p>
<ul style="list-style-type: none"> Suggestions that City consider drafting Area Plans for the future non-Industrial uses prior to the conversion. 	<p>Civic administration find it would be premature to prepare plans for non-Industrial land uses prior to a redesignation that would permit the non-Industrial use.</p>
<ul style="list-style-type: none"> Do entire areas need landowners interested in order for sites to be recommended for conversion, or only certain major property owners. 	<p>Landowners are encouraged to participate in the Industrial Land Conversion process once it is initiated. Civic Administration anticipate that the process will be based upon landowner interest, but evaluations will be on a case-by-case basis.</p>
<ul style="list-style-type: none"> Will evaluations be site-by-site or larger Industrial areas. 	<p>Civic administration anticipate that it will be larger areas that will be evaluated, rather than individual properties; however, it may depend on various factors, such as the nature of the industrial use, industrial area, adjacent uses, and the setbacks or topography around a site or area.</p>
<ul style="list-style-type: none"> Is there opportunity for re-use of some older industrial sites for different Industrial uses (e.g. Operations/Works yards). 	<p>If lands are required for an industrial use, then no conversion or redesignations would be recommended by Civic Administration.</p>

4. Land Needs Sufficient for Growth/ Urban Growth Boundary Review (if required)

Comment received	Civic Administration response
<ul style="list-style-type: none"> Suggestion that Council consider adjustments to the Urban Growth Boundary regardless of whether an expansion is warranted. 	<p>This would be subject to Council's direction during a review of "Alternative Directions" for growth.</p>
<ul style="list-style-type: none"> Concern was expressed that the legislation appears to be written only to consider urban growth and urban land use needs, not any consideration of agriculture or the amount of agricultural production needed to support the growing population. 	<p>Civic Administration recognize that Provincial interests and the PPS include protection of agricultural lands and the natural heritage system. However, the focus of the Comprehensive Review is the accommodation of projected population within urban areas.</p>
<ul style="list-style-type: none"> Question asked about whether operational costs are considered in outward expansions (e.g. snowplowing). 	<p>Civic Administration identified that Service Areas undertake financial planning through the budgeting processes, and this would include services for projected new population.</p>
<ul style="list-style-type: none"> Discussion with industry needs to be ongoing through the review, as certain policy changes like Planning Horizon or Intensification Target may impact the land needs evaluations. 	<p>Industry and public consultations will be held throughout the Comprehensive Review process, including through the Land Needs Assessment components of the review.</p>