

Report to Planning and Environment Committee

To: Chair and Members
Planning and Environment Committee

From: Scott Mathers, MPA, P.Eng.

Subject: Deputy City Manager, Housing and Community Growth
Official Plan Review of The London Plan: Final Industrial Land
Needs Assessment (Employment Areas) with Draft Urban
Growth Boundary Review and Process Updates
File Number: O-9595
Public Participation Meeting

Date: October 1, 2025

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the Section 26 Official Plan Review of The London Plan and Land Needs Assessment:

- (a) That the Land Needs Assessment (Employment Areas) attached hereto as Appendix "A" **BE ADOPTED** for use as part of the Section 26 Review of The London Plan.
- (b) That the Draft Urban Growth Boundary Review (Employment Areas) and revised Draft Urban Growth Boundary Review (Community Growth) attached hereto as Appendix "B" **BE RECEIVED**.
- (c) That Civic Administration **BE DIRECTED** to continue consultation on the Draft Urban Growth Boundary Review (Employment Areas) with the community, development industry, and local Indigenous communities.
- (d) That the Draft Privately Initiated Urban Growth Boundary Expansion Application Policies and Guidelines, attached hereto as Appendix "D", **BE RECEIVED**;
- (e) That Civic Administration **BE DIRECTED** to continue consultation on the Draft Privately Initiated Urban Growth Boundary Expansion Application Policies and Guidelines with the community, development industry, and local Indigenous communities;
- (f) That Civic Administration **BE DIRECTED** to consult with the development industry regarding a revised Natural Heritage System buffer methodology, consistent with Council-adopted Environmental Management Guidelines (2025).
- (g) That this report **BE RECEIVED** for information.

IT BEING NOTED that following additional consultations, the Urban Growth Boundary Review and the Privately Initiated Urban Growth Boundary Expansion Application Policies and Guidelines will be presented to a future meeting of Council and forwarded to the Ministry of Municipal Affairs and Housing for approval.

IT BEING FURTHER NOTED that Civic Administration will continue to work with interested Indigenous communities to explore opportunities for Additions to Reserve for potential new urban reserve lands, which may accommodate Indigenous economic development opportunities or community growth.

Executive Summary

The purpose of this report is to present the findings of the draft Urban Growth Boundary Review (Employment Areas) and to receive approval of the final Industrial Land Needs Assessment (ILNA), which identifies the need for an Urban Growth Boundary (UGB)

expansion of 88 hectares for industrial land uses. The draft UGB Review (Employment Areas) is for continued consultation with the community, Indigenous communities, and development industry, noting that the preliminary locations for growth are based on landowner requests and evaluation criteria. The expansion represents an addition of approximately 88 developable hectares for Employment Areas to be approved by Council. Lands outside of the existing urban area were assessed based on criteria consistent with the *Provincial Planning Statement, 2024* (PPS) and policies regarding UGB expansion within *The London Plan*. Further key considerations in the evaluation are presented in Appendix "E" of this report.

To date, 45 submissions have been received and evaluated for Employment Areas (i.e., industrial land use). These submissions represent approximately 2,172 hectares of land evaluated through the UGB Review process. Draft mapping related to the proposed UGB expansion for Employment Areas was made publicly available on the City's website in late August.

The draft expansion area is 147 hectares. After excluding Green Space and Environmental Review lands, as well as an undevelopable hydro corridor, the expansion area is 94 hectares. Then, following buffering of the natural features, the expansion area has an estimated range from 85 to 92 hectares of developable land, pending the size of the buffer adjacent to the Natural Heritage System components and potential environmental areas requiring further environmental review.

This report also provides several process updates on the Official Plan Review and UGB Review. First, the Ministry of Finance (MOF), released updated Ontario Population Projections that represents a significant downward adjustment in comparison to the 2024 release, which Council approved for the basis for this review. Notably, the 2025 update would result in the need for a UGB expansion of 1,054 hectares for Community Growth (down from 1,476 ha.) and no additional land required for Employment Area UGB expansion (down from 88 ha.). However, for consistency with earlier Council direction, the 2024 MOF projections will continue to be used for land need calculations for the purposes of this review.

Second, a revised draft UGB expansion for Community Growth has been prepared in response to the proposed draft expansion for Employment Areas. Third, a revised ecological buffer methodology has been applied to reflect Council approval of updated Environmental Management Guidelines (EMG). The revised buffers which are based on Natural Heritage System (NHS) features will be considered alongside 20 metres generalized buffers for developable land calculations. Fourth, the Minimum Distance Separation calculations will be updated based on further consultation with agricultural landowners.

Finally, draft material related to complete application study and process requirements for Privately Initiated Urban Growth Boundary Expansion Applications is being presented for the purpose of continued consultation.

Preliminary public, development industry, and Indigenous engagement has been held to identify issues and receive comments on the draft UGB area. The draft UGB is for the purposes of continued consultation. Civic Administration will return to Council with the final recommended UGB expansion sites for Council's consideration. The final UGB Review (Community Growth and Employment Areas), targeted for Q4 2025, will include the final recommended UGB expansion for Council's adoption and circulation to the Ministry of Municipal Affairs and Housing for Ministerial approval under Section 26 of the *Planning Act*.

Linkage to the Corporate Strategic Plan

The Official Plan Review under Section 26 of the *Planning Act* will contribute to the advancement of Municipal Council's 2023-2027 Strategic Plan in the following ways:

- **Strategic Plan Area of Focus: Housing and Homelessness**, by ensuring London's growth and development is well-planned and consider use, intensity, and form.
- **Strategic Plan Area of Focus: Climate Action and Sustainable Growth**, by ensuring infrastructure is built, maintained and secured to support future growth and protect the environment.
- **Strategic Plan Area of Focus: Economic Growth, Culture, and Prosperity**, by ensuring London has a sufficient supply of serviced lands in strategic locations.

A Climate Change Emergency was declared by City Council on April 23, 2019. The subsequent Climate Emergency Action Plan (April 2022) states several goals being undertaken simultaneously. The Official Plan Review addresses several Areas of Focus for climate change mitigation and adaptation, including:

- Transforming Buildings and Development.
- Reducing emissions from new and existing buildings and building London towards a low-carbon, equitable and inclusive future.
- Transforming Transportation and Mobility.
- Reducing emissions associated with the movement of people and goods.
- Adapting and Making London More Resilient.
- Improving the physical and social resilience of existing community in the face of climate change.

Through consultation with the City of London Climate Change, Environment, and Waste Management Division, it was determined that the relevant major climate change considerations for the ILNA include land use changes and natural heritage loss / disconnection. In evaluating candidate locations for urban expansion, minimization of impacts to natural heritage features have been considered. Many of the other climate change considerations that are relevant to industrial land development, such as carbon sequestration potential, embedded carbon, biodiversity loss, waste creation, etc. will be addressed at the site plan phase.

Discussion and Analysis

1.0 Background

1.1 Previous Reports Relating to this Matter

- April 11, 2023, Comprehensive Review of The London Plan: Terms of Reference, File Number O-9595, Public Participation Meeting, Staff Report to Planning and Environment Committee.
- July 17, 2023, Update on Comprehensive Review of The London Plan, File Number: O-9595, Staff Report to Planning and Environment Committee.
- March 19, 2024, Official Plan Review of The London Plan and Land Needs Assessment Update, File Number: O-9595, Public Participation Meeting, Staff Report to Planning and Environment Committee.
- June 11, 2024, Draft Land Needs Assessment of The London Plan, File Number: O-9595, Public Participation Meeting, Staff Report to Planning and Environment Committee.
- December 3, 2024, Final Land Needs Assessment (Community Growth), File Number: O-9595, Public Participation Meeting, Staff Report to Planning and Environment Committee.

- April 8, 2025, Official Plan Review of The London Plan: Draft Industrial Land Needs Assessment (Employment Areas) and Process Update, File Number: O-9595, Public Participation Meeting, Staff Report to Planning and Environment Committee.
- June 23, 2025, Official Plan Review of The London Plan: Draft Urban Growth Boundary Review (Community Growth), File Number: O-9595, Public Participation Meeting, Staff Report to Planning and Environment Committee.

1.2 Planning History

In December 2022, Council approved the 2021-2051 growth projections for the City of London. An Official Plan Review of *The London Plan* under Section 26 of the *Planning Act* was formally initiated in early 2023 and Terms of Reference were presented at a special meeting of Council on April 11, 2023. The Official Plan Review includes a Land Needs Assessment (LNA) to determine whether the existing land supply can accommodate projected population and employment growth over the defined planning horizon.

On June 11, 2024, a draft LNA for Community Growth (i.e., non-industrial lands) was presented to Planning and Environment Committee. Following presentation of the draft LNA, additional consultations were undertaken by staff. Community and Indigenous consultations were held, and development industry feedback was received through the Housing Supply Reference Group (HSRG) including 5 meetings and 2 technical consultations.

On October 20, 2024, the new *PPS* came into force and effect replacing the *Provincial Policy Statement, 2020*. The new provincial policy framework included significant changes to growth management planning. The new *PPS* permitted use of 20 to 30-year planning horizons for official plan updates and required planning authorities to base growth forecasts on MOF population projections. On December 17, 2024, Council adopted the final LNA for Community Growth and initiated an UGB Review contemplating a 30-year planning horizon of approximately 1,476 hectares, which is the maximum permitted under the *PPS*.

On April 8, 2025, a draft ILNA was presented to Planning and Environment Committee which included an analysis of the suitability and market-readiness of industrial lands in conformity with policy 2.8.1.1 of the *PPS*. To remain in alignment with Council directions related to the LNA for Community Growth, the ILNA incorporates the 2024 MOF Ontario Population Projections and a 30-year planning horizon.

On June 23, 2025, a draft UGB for Community Growth was presented to Planning and Environment Committee. The draft UGB Review includes an evaluation of site requests by landowners for potential inclusion within the UGB and identifies candidate blocks of land representing logical extensions of requested lands or existing neighbourhoods for potential inclusion.

1.3 Financial Impact

The ILNA is expected to have financial impacts to the City; however, the order of magnitude of cost to service various blocks of land added to the city's urban area will not be known until the specific blocks are established through the adoption of the UGB Review. Costs and feasibility of servicing and infrastructure are part of the UGB Review evaluation criteria, which are appended to this report.

2.0 Industrial Lands Needs Assessment (Employment Areas)

2.1 Resulting Land Need

Based on the 2024 MOF population projections, at the end of the 30-year planning horizon, there is a deficit of 88 ha of suitable vacant land supply for new industrial

developments. There is an identified need for additional industrial lands by 2054, and therefore a UGB Review for Employment Areas is warranted.

The deficit of 88 ha of suitable vacant land results from approximately 259 ha of land being deemed “Ineligible” and 209 ha of land that being deemed “Unsuitable”. These lands will be evaluated for the potential to redesignate to a more suitable Place Type in *The London Plan*. Following the completion of the UGB Review potential redesignations will be evaluated, discussed with landowners, and presented to Planning and Environment Committee in 2026.

2.2 Request for Minister Zoning Order

On February 19, 2025, a landowner requested City support for the initiation of a Minister’s Zoning Order (MZO) for the lands at 4423 Highbury Avenue South. The landowner is requesting an MZO for inclusion of land within the UGB and designation of the subject lands for Light Industrial use. It should be noted that the subject lands had been previously submitted as a candidate site to be evaluated within the context of the UGB Review. The MZO request received Council endorsement on March 4, 2025, and will require Ministerial approval in accordance with the zoning order framework requirements. For consistency, the lands at 4423 Highbury Avenue South were evaluated using the criteria identified in Appendix “C”; however, a decision on the MZO for inclusion within the UGB will be at the discretion of the Minister of Municipal Affairs and Housing.

3.0 Urban Growth Boundary Review

Based on Council Direction to initiate the UGB Review, a set of evaluation criteria, in alignment with policy 76 of *The London Plan*, is attached as Appendix “C” to this report. Consistent with guidance from the provincial planning policy framework, the criteria are intended to guide the evaluation of the most suitable industrial lands to be considered for inclusion within the UGB expansion.

Following Council Direction, Civic administration has identified blocks of land adjacent to the existing UGB for evaluation against the same criteria noted above. Requests for inclusion have been received from interested landowners identifying sites to be evaluated for potential inclusion within the UGB Review, and those requests submitted to Staff and evaluated for industrial inclusion are shown in Appendix “C”.

Certain landowners have submitted requests for sites to be evaluated, and those Employment Area requests, as well as seven (7) late submissions for Community Growth evaluation submitted to Staff are shown in Appendix “L”. These submitted requests have been evaluated against the evaluation criteria identified in Appendix “C” to this report.

Following continued consultation with the community, Indigenous communities, and development industry, the Final UGB Review will be presented at a future PEC meeting for Council adoption and circulation to the MMAH for Approval under Section 26 of *The Planning Act*.

3.1 Evaluation Criteria

A comprehensive evaluation process was undertaken to identify recommended locations for expansion. Staff have identified areas for growth based on the results of the ILNA. Lands outside of the existing urban area were assessed based on criteria consistent with PPS (ss. 2.3.2.1) and policies related to UGB expansion in *The London Plan* (policy 76). The evaluation criteria were applied to all candidate properties submitted by landowners and to surrounding blocks of lands outside of the existing UGB, and includes the following criteria:

- Addressing the need to designate and plan for land to accommodate an appropriate range and mix of land uses.

- Parcel shapes, size, configuration, topography, and potential for planned urban uses.
- Existing and planned infrastructure will be optimized: a logical integration with master servicing strategies.
- Logical and financial viability of servicing new parcels or areas.
- Impact on agricultural operations will be minimized, including directing expansions to lower classes of prime agricultural land categories to the extent possible, or mitigation where avoidance is not possible.
- Meets the Province's Minimum Distance Separation requirements (for separation between existing livestock operations and new sensitive land uses).
- Logical extension of an existing neighbourhood and/or will be large enough area to accommodate a complete new neighbourhood (Future Industrial Growth) through phased progression of urban development.
- Protection of components of the Natural Heritage System and built heritage.
- Alignment with economic development objectives and priorities, including the City of London's 2023 Industrial Land Development Strategy.

Detailed evaluation results are included in Appendix "C" of this report.

The downstream impact on wastewater treatment plant (WTP) capacity was identified as a major cost and constraint related to the serviceability of lands. While both plants and pumping station capacity demonstrate constraints in different urban areas, the WTP upgrades at full build-out demonstrate the largest cost and constraint. Key servicing considerations include the speed and certainty of process timing (e.g. Environmental Assessment, land acquisition, intergovernmental agreements); minimizing costs and WTP upgrades; minimizing environmental impact; minimizing impact on Indigenous communities; minimizing impact on neighbouring municipalities; ensuring a servicing solution is addressed in the sewer shed and not leapfrogging to a further sewer shed; and recognizing both intensification and greenfield development with some plants primarily treating growth in the form of intensification and infill.

An assessment of agricultural impact related to UGB expansion was undertaken to ensure lands planned for farmland can maintain their viability as agricultural areas. In order to remove agricultural land for urban expansions, municipalities are to evaluate alternative locations which avoid prime agricultural areas and, when avoidance is not possible, consider reasonable alternatives in lower priority agricultural lands (*PPS* ss. 2.3.2d). Consistent with provincial direction, the draft proposal for expansion contemplates the avoidance of fragmented farmland patterns and loss of prime agricultural land, where possible. An MDS study has been completed for barns located on or in proximity to the landowner requested sites, and other candidate expansion blocks (See Appendix "F" for MDS related to Employment Area evaluations). The calculations have been prepared based on the Ministry of Agriculture, Food and Agribusiness (OMAFA) Implementation Guidelines and are made available for further consultation purposes. MDS Policies of *The London Plan* and OMAFA's Implementation Guidelines will be applicable for lands entering future development application processes.

The Environmental Policies in *The London Plan* provide clear guidance on how the natural heritage system should be protected, conserved, and enhanced. Natural Heritage policies outlined in *PPS* subsection 4.1.1 state that natural features and areas shall be protected for the long term. Consistent with the above noted policies, submissions were evaluated based on features identified on Map 5 (Natural Heritage) and Map 6 (Hazards and Natural Resources) of *The London Plan*. Evaluation criteria considered the presence of natural and human-made hazards related to the feasibility of development. The evaluation results are representative of both presence and scale of natural features. Where avoidance is not possible, it is expected that mitigation efforts will be undertaken through the complete application requirements through planning application process. Both Green Space and Environmental Review lands have been discounted from the developable land supply. Buffers were then applied to lands immediately surrounding these natural heritage features. As noted above, future development application processes may require an EIS. The EIS may determine that

certain Environmental Review lands do not include an environmental feature and therefore are developable lands. Additional developable lands may be found through such studies, which in turn have the potential to increase the size of developable area in the lands identified in draft UGB expansion.

More detailed evaluations of servicing considerations, agricultural impact assessment, and natural heritage from Section 2.0 of the June 23, 2025, Staff Report have been included in Appendix "E" of this report.

4.0 Consultation

4.1 Public Engagement

The City of London is undertaking ongoing consultation on the Official Plan Review with the development industry and local community. Following the presentation of the Draft ILNA on April 8, 2025, staff have met with two (2) interested parties regarding the ILNA and proposed UGB Review (Employment Areas). One (1) Community Information Meeting was held on September 3, 2025, and one (1) meeting with the development industry was held on September 5, 2025.

Themes of consultation on the ILNA and draft UGB expansion related to the following topics:

- Concerns related to industrial parcels identified as "ineligible" or "unsuitable"
- Clarification of next steps for review of ineligible and unsuitable industrial lands
- Evaluation methodology and process related to the proposed areas for UGB expansion including timeline and next steps
- Clarification of MDS methodology and impacts related to development potential
- Current timeline for property associated with ongoing MZO request
- Clarification of the difference between the Development Charges Background Study and Urban Growth Boundary Review processes
- Concerns related to certain landowners' properties not being included in draft industrial expansion mapping
- Concerns related to impact of Ministry of Finance 2025 population projections and further impacts of population shifts
- Clarification of industrial strategy for attracting large-scale industry / employers
- Clarification related to allocation for future school blocks within Council-adopted Land Needs Assessment and draft expansion mapping
- Clarification of timing and land inventories for future 5-year reviews following Official Plan Review
- Clarification on Place Types for land areas included within the UGB expansion
- Confirmation of coordination between complete application requirements and recent changes regarding Ministry approvals
- Clarification on evaluation criteria to determine the recommended Place Types
- Clarification on scope and process of subsequent neighbourhood/area plans and development phasing
- Request for City's mapping associated with privately initiated UGB Expansion application submissions.

To date, 45 submissions have been received for evaluation related to Employment Areas. These submissions represent approximately 2,172 ha of land to be evaluated through the UGB Review. Draft mapping related to the proposed UGB expansion for Employment Areas was made publicly available on August 26, 2025. Additionally, Civic Administration has circulated notice to two (2) property owners where expansion has been considered without an associated request.

Consistent with July 22, 2025, Council Direction, staff have continued consultation related to the UGB Review (Community Growth). Staff have received 10 additional comments including two (2) submissions requesting exclusion from the UGB draft expansion areas, and a joint formal submission from the Old Victoria Road Community Association requesting inclusion. A meeting with the development industry was held on

June 25, 2025. Opportunities for further engagement will be made available prior to the final recommendations related to the UGB Review.

Detailed notes from Community Information Meetings and public comments are included in Appendix "K" of this report.

4.2 Indigenous Engagement

The City of London remains committed to ensuring that the Official Plan Review and UGB Review are aligned with strategies and actions outlined within the 2025-2035 ReconciliAction Plan. Civic Administration has continued to circulate notifications to eight (8) local Indigenous communities and offer opportunities for engagement with any interested community. Following circulation of the draft UGB Expansion for Community Growth, a meeting was held with the Chippewas of the Thames First Nation on July 2, 2025, and three (3) communications have been received. The communications include an email dated June 6, 2025, from Chippewas of the Thames First Nation; a letter dated June 19, 2025, from Chief R. K. Joe Miskokomon, Chippewas of the Thames First Nation; and a letter dated June 19, 2025, from Chief J. Todd Cornelius, Oneida Nation of the Thames. Themes of discussion have included:

- Request to pause UGB Review until wastewater treatment concerns are resolved
- Request for Council to formally oppose development south of Dingman Creek
- Obligations outlined under Section 35 of the *Constitution Act, 1982*
- Protection of ecological corridors associated with the Thames River and its tributaries including Dingman Creek
- Concerns related to westward expansion toward Komoka Provincial Park and the surrounding ecological and cultural landscape
- Renewed collaboration related to watershed monitoring and management
- Clear plans to prioritize infill development before expanding outward
- Formal inclusion of Indigenous perspectives, traditional ecological knowledge in long-term land use planning, use of "Seven Generations" principle, and outreach campaigns to highlight value of natural lands at risk from development.
- Interest in investigating opportunities for new urban reserve lands or "Addition to Reserves".

4.2.1 Opportunities for Additions to Reserve

During recent meetings, it has been indicated to City Staff that there may be an interest in Additions to Reserve (ATR). ATR is the process of adding land to an existing reserve of an Indigenous community, or the creation of new reserve land. ATR can provide land to support community growth, or for Indigenous economic development initiatives.

Through ongoing engagement, the City of London will work with interested Indigenous communities and the Federal Government to explore opportunities for urban reserve lands in the City of London. The ATR process is administered by the Federal Ministry of Indigenous Services Canada and policies of the *Addition of Lands to Reserves and Reserve Creation Act*.

5.0 Candidate Industrial Expansion Area Evaluation

The draft proposal represents a total urban area expansion comprised of 147.2 ha of land to be included within the UGB boundary for future Industrial land uses. Based on the criteria presented in Section 3.1 of this report, approximately 94.4 ha of land has been identified to accommodate demand related to Employment Areas, excluding lands within Green Space and Environmental Review place type designations, as well as an undevelopable hydro corridor. Consistent with the ILNA, attached as Appendix "A" of this report, from the proposed UGB expansion for Employment Areas, an estimated range of 85 ha (20m buffer) to 92 ha (EMG-based buffer) is considered developable land based on buffering from the Natural Heritage System components.

The draft expansion represents proposed locations based on logical extensions of the existing urban area and infrastructure. Following evaluation of lands outside the UGB, Dingman Creek and Highway 401 were identified as appropriate boundary features for urban area expansion. Both features represent logical transitions between London's urban and rural fabric and would avoid substantive loss of prime agricultural lands which are largely associated with Rural London's southern extent, thus minimizing agricultural fragmentation and agricultural impact. Dingman Creek is an environmental constraint for urban expansion and the servicing strategy required to cross the watercourse would have substantial financial and environmental impacts, as well as time for required environmental studies and consultations. Highway 401 is a major goods movement corridor as defined in the *PPS* and adjacent lands are identified as prime strategic locations in the City's Industrial Land Development Strategy (ILDS). These areas would require broad-based servicing and represent a planning approach inconsistent with policies 55 and 59 of *The London Plan* related to cost efficient growth and compact, contiguous pattern of growth.

The following are summary evaluations by various candidate growth areas of the city. Figure 2 shows mapping of the candidate blocks referred to below. Detailed evaluations by property are included in Appendix "C".

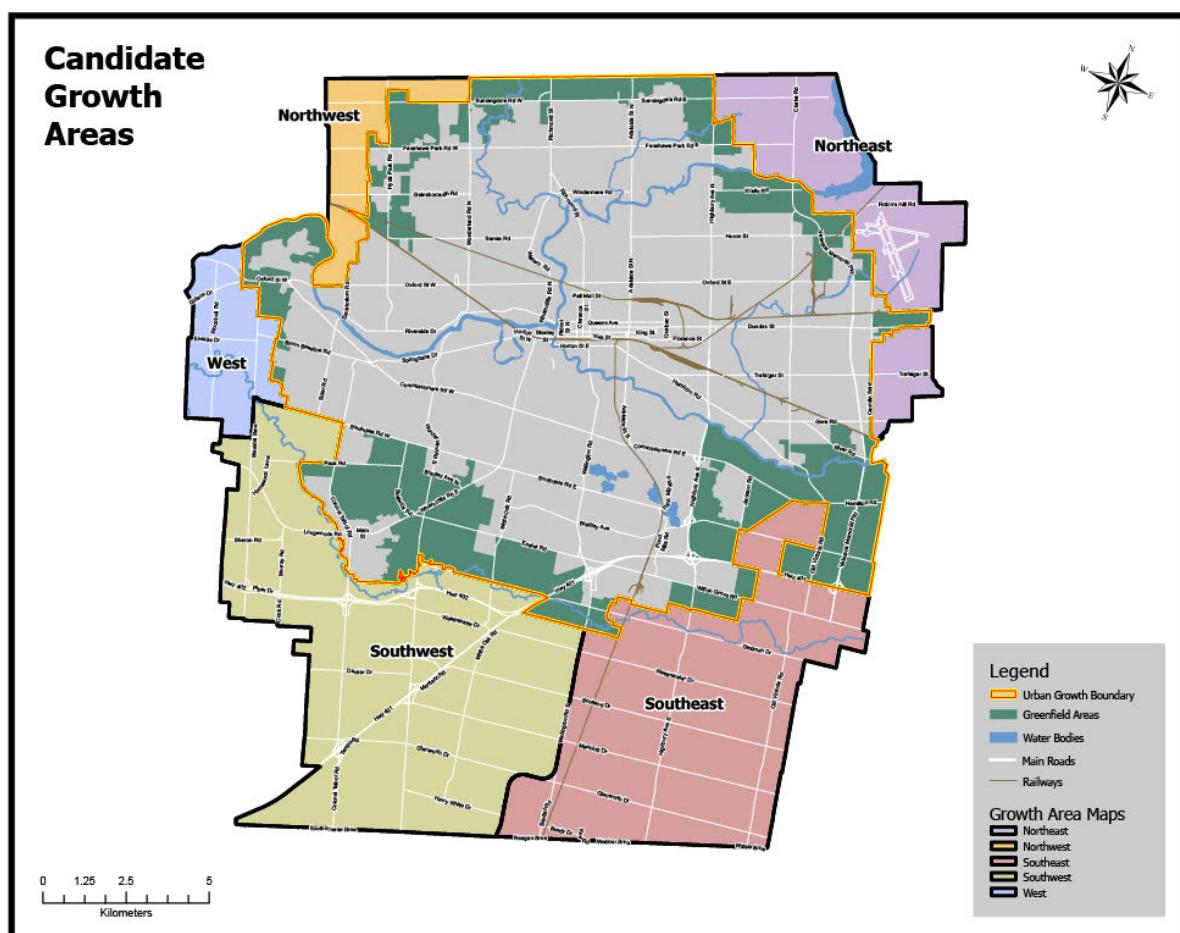


Figure 1: Candidate Growth Areas for Urban Growth Boundary Expansion

5.1 North

The current North Greenfield Area is bounded by the municipal boundary to the north, the Northwest Candidate Area to the west, Northeast Candidate Area to the east, and Built Area Boundary to the south. Further expansion of existing North Greenfield Area would require annexation of lands outside the municipality and therefore Figure 2 does not include a North candidate expansion area. Annexation is under Provincial jurisdiction and therefore outside of the scope for the UGB Review.

5.2 Northwest

The Northwest area received no submissions for industrial evaluation. Evaluation of this candidate growth area can be found in Section 4.0 of the Official Plan Review of *The London Plan: Draft Urban Growth Boundary Review (Community Growth)*, File Number: O-9595 Staff Report to Planning and Environment Committee on June 23, 2025.

5.3 Northeast

The Northeast area received 11 submissions comprised of 19 properties for industrial evaluation, totalling an estimated 370 ha of developable land. An industrial expansion in the Northeast area is not recommended at this time.

The area is divided into two blocks separated by London International Airport and a segment of the furthest eastern extent of the current UGB. These blocks have distinct and differing land use characteristics which were accounted for in the evaluation process. The block south of London International Airport has notable constraints related to existing land uses and within the context servicing capacity. The block is largely comprised of prime agricultural land including Class 1 and Class 2 soils, as noted in the OMAFA Soil Survey. Seven (7) livestock facilities were identified through the MDS Study with one (1) facility subject to a landowner submission for inclusion. The area is serviced by the Pottersburg WTP which, as noted in Appendix "E" of this report, the magnitude of costs associated with expansion of capacity for Pottersburg WTP is substantial at \$200 Million growth cost or roughly twice the cost of other treatment plant upgrades, and large-scale industrial expansion within this sewer shed would not be deemed optimal use of planned or future infrastructure. The lack of planned infrastructure east of Crumlin Sideroad also creates conditions which are less ideal for expansion; however, viable servicing solutions could be identified through a master servicing study.

The north block of the Northeast candidate growth area is located above the London International Airport. The north block is comprised of a mix of soil classifications; however, the timing of redevelopment of certain lands may be constrained due to the presence of active aggregate operations. Unlike the southern block of the Northeast Candidate Growth Area, this northern block is serviced by the Adelaide WTP. This distinction results in a substantially lower magnitude of costs associated with the provision of sanitary capacity and represents a financially viable sanitary servicing strategy. The Adelaide WTP has the lowest estimated cost at full build out, at approximately \$28 million.

Market demands for industrial land require proximity to transportation corridors, such as Highway 401 and Highway 402. The north block of the Northeast candidate growth area does not provide ease of access to these transportation corridors and is therefore not ideal for industrial expansion. Additionally, this area represents logical extension of residential uses, and a significant portion of this area has been identified for Community Growth expansion; therefore, industrial expansion in this area would create potential competing interests and is not recommended.

5.4 Southeast

The Southeast area received 18 submissions comprised of 27 properties for industrial evaluation, totalling an estimated 494 ha of developable land. Staff are supportive of five (5) requested properties within the candidate growth area and are recommending the addition of two (2) additional parcels for contiguity.

The Southeast area contains prime industrial land along the Veterans Memorial Parkway and Highway 401 corridors allowing for logical extension of industrial land on the north side of Highway 401. It is anticipated that the Southeast area in proximity to Highway 401 and Veterans Memorial Parkway will present a transitional area between future Community Growth and future Industrial Growth land uses, for any areas included within the UGB.

Lands south of Highway 401 are comprised of prime agricultural land with Class 1 to Class 3 soils and a significant presence of livestock facilities and active agricultural operations. Portions of Highway 401 and the Dingman Creek comprise a logical division between Rural London and the city's urban area, and expansion beyond these obstacles would be inconsistent with Rural Neighbourhood policies 1179 and 1180 in

The London Plan pertaining to the protection of farmland and mitigation of negative impacts to agricultural operations where feasible.

Given the limited amount of land available for expansion to accommodate industrial uses, it is recommended that UGB expansion be allocated to the north of Highway 401 to avoid the introduction of incompatible land uses and preserve established agricultural land use. The recommended location of expansion area represents logical extensions of existing industrial lands utilizing Bradley Avenue as separation between the proposed Employment Area expansion and the proposed Community Growth expansion and avoids conflict with an existing large-scale livestock operation.

5.5 Southwest

The Southwest area received 16 submissions comprised of 33 properties for evaluation, totalling an estimated 736 ha of developable land. It is not recommended that a UGB expansion to include industrial uses in the Southwest area occur at this time.

This area presents significant challenges related to sanitary capacity and the accommodation of substantial urban area expansion. Significant concerns were also expressed during engagements with Indigenous communities related to negative downstream impacts along the Thames River associated with the wastewater treatment plants and urbanization of Rural London south of Dingman Creek.

The Southwest area is comprised of prime agricultural land with a mix of soil classifications primarily ranging from Class 1 to Class 3 soils. The MDS Study identified a significant presence of livestock facilities, and several active agricultural operations were also noted during evaluation. Dingman Creek and its associated floodplain represents a logical southern boundary for urban expansion due to its significance as a Natural Heritage System and constraints for the extension of servicing across the watercourse.

The Southwest candidate area is subject to existing infrastructure constraints related to an appropriate sanitary servicing strategy for further development. Oxford WTP serves the western portion of the City and does not have sufficient capacity to accommodate cumulative growth expected from full build-out of the Southwest, West, and Northwest areas. The construction of a new wastewater treatment plant to service the southwest area was previously refused by Council as the appropriate servicing solution because of financial costs, and related environmental concerns and concerns expressed by Indigenous communities associated with the effluent outlets along the Thames River. An alternate strategy to divert flows to other wastewater treatment plants would constitute leapfrogging of sewer sheds and would not be supported as a viable strategy.

5.6 West

The West area received no submissions for industrial evaluation. Evaluation of this candidate growth area can be found in Section 4.0 of the Official Plan Review of The London Plan: Draft Urban Growth Boundary Review (Community Growth), File Number: O-9595 Staff Report to Planning and Environment Committee on June 23, 2025.

6.0 Process Updates

6.1 Update to Draft UGB Review (Community Growth)

A revised UGB expansion for Community Growth has been prepared in response to the proposed expansion for Employment Areas along the south side of Bradley Avenue. Noting favourable evaluation results, and a joint submission from the Old Victoria Road Community Association, the Southeast was selected for further expansion. The expanded area is directly adjacent to lands previously identified for proposed expansion and is a logical extension of existing neighbourhoods to the north and west. The expansion allows for orderly development in the area and avoids a “donut hole” of agricultural land surrounded by urban uses, and avoids leapfrog development resulting

from the proposed Employment Area expansion. The inclusion of lands along Old Victoria Road and the north side of Bradley Avenue allows for an Employment Area expansion along the entirety of the south side of Bradley Avenue and provides an appropriate boundary for residential-industrial interface. The revised expansion is presented for continued consultation, and further revisions may be considered to ensure conformity with PPS requirements for urban expansion.

Revised mapping and detailed evaluations are included in Appendix "B" and Appendix "C" of this report.

Appendix "J" shows mapping of draft expansion areas with environmental lands.

6.2 Natural Heritage System Buffers and Revised Methodology

On July 22, 2025, Council adopted the updated EMG, with revisions to ecological buffers informed by development industry and public consultation. The update included a revised minimum buffer width for Woodlands and Significant Woodlands and addressed priority issues raised by the development industry and local resource partners.

The Proposed Urban Growth Boundary Expansion (Community Growth) mapping brought forward in June 2024 was prepared by excluding Green Space and Environmental Review lands and by applying generalized buffers to natural features. The buffering approach used standardized widths of 20 metres and 30 metres based on the largest buffers required.

The updated EMG requires a 30-metre buffer width only for the most sensitive protected NHS components. The revised methodology would align with the 2025 EMG and would apply buffers to individual Natural Heritage System features rather than excluding all Green Space and Environmental Review place types. This feature-based approach would more accurately estimate the developable area within the draft expansion area and reduce the risk of underestimating developable land.

Overall, the revised methodology is anticipated to result in a net reduction in the area included within the new Urban Growth Boundary.

Further consultation with the development industry is recommended on the revised Natural Heritage System buffer methodology. This additional consultation would likely require four to five working group sessions and may extend the final report timeline by approximately two months. Civic Administration is seeking direction to continue consultation on applying a feature-based buffer calculation consistent with the Council adopted EMG (2025).

6.3 Minimum Distance Separation (MDS) Data Collection

In the June 23, 2025 staff report, an MDS study was completed for livestock facilities and unoccupied barns located on or in proximity to the landowner requested sites, and other candidate expansion blocks, as part of an assessment of agricultural impact related to UGB expansion for Community Growth. The preliminary calculations were made based on the OMAFA Implementation Guidelines and presented for further consultation purposes. Consistent with OMAFA Guideline #16, staff have continued consultation related to MDS setbacks and obtaining information to be used in revised calculations. On July 9, 2025, a Letter of Notice was mailed out directly to farm operator(s) or owner(s) of 201 properties previously identified as livestock facilities or unoccupied barns, with the purpose of confirming livestock and manure type as well as design capacity. This request sent to operators is for confirmation or revision of MDS I calculations. In addition, complementary information was considered in preliminary MDS calculations such as aerial photography including shape of buildings, auxiliary buildings, and building area to reflect existing conditions, consistent with other sources of independent information provided within OMAFA Guideline #16.

Staff have received additional information from farm owners or operators within the UGB Review (Community Growth) MDS study area and setback calculations will be revised, if applicable, in conformity with the communications received to date. The requested information is consistent with Section 6.1 MDS Calculation Form within OMAFA Implementation Guidelines including, but not limited to: livestock type, number of livestock, and manure system. Revised MDS I calculations and mapping by growth areas will be presented as part of the Final UGB Review (Community Growth and Employment Areas), targeted Q4 2025.

MDS preliminary calculations for the Employment Areas evaluations are shown in Appendix "G" of this report.

The livestock facility and unoccupied barns data collection form circulated is included in Appendix "H" of this report.

6.4 Ministry of Finance Population Projections

On August 5, 2025, the Ministry of Finance (MOF) released the annual update of population projections for Ontario census divisions. The update considers longer-term shifts in demographic trends and the decrease in Federal immigration targets. Assumptions for population growth includes recent trends in net migration (net international migration, net interprovincial migration and net intraprovincial migration), evolution of long-term fertility and mortality patterns in each census division. Key contributing factors to the 2025 MOF projected growth methodology appear as follows:

- Decreasing levels of Non-Permanent Residents (NPR) due to Federal Government policies, considering a decrease from a projected 52,000 in 2024-25 to 26,000 in 2025-26.
- Provincial population growth scenario considers a slow increase in the short term, at a projected annual rate of 0.2 per cent in 2025-26. 2025 MOF assumptions account for an average around 1.0 per cent annually by the end of the projection period 2050-51.
- Net migration is projected to rebound to 162,000 in 2029-30 and increase gradually, reaching 225,000 by 2050-51.
- The 2025 MOF growth forecast accounts for a 29 per cent reduction of NPRs in Ontario's population projection, in a five-year timeline (2024 – 2029), according to the 2024 Federal Government Immigration Policies.
- The province of Ontario is also expecting lower levels of natural increase, considering a negative contribution to population growth starting in 2031-32. Moreover, projected net migration will be the only positive contributing factor to Ontario's population growth after 2032, according to MOF assumptions.
- The projected growth relies on the current national immigration targets of 500,000 being met annually until 2030.
- MOF projections account for the immigration rate to gradually increase after 2026-27, reaching 1.2 per cent by 2041.
- Longer-term outlook of the 2025 MOF growth forecast considers these adjusted demographic trends, compared to the 2024 released forecast, which included more optimistic net immigration levels.
- The reference scenario outlined projected net immigration to account for all population growth in Ontario, with a 2031-32 starting point.

The assumptions in the 2025 MOF forecast are representative of a significant downward adjustment in comparison with the 2024 growth forecast, which reflected optimistic growth exceeding previous MOF annual releases and Council-approved projections. There is a corresponding decrease of 55,000 persons in the City of London population share, by the end 2050-51, compared to the 2024 projection. The updated MOF forecast has resulted in decreased land demands across non-industrial and industrial uses. A deficient supply at the end of the planning horizon results in the requirement for a UGB expansion (see Table "2" below).

Based on the 2025 MOF forecast, there is a land need for UGB expansion by approximately 1,054 hectares of developable land, to accommodate planned Community Growth over the 30-year planning horizon. This is 422 hectares less than the required UGB expansion based on the 2024 MOF projections. For Employment Areas, the 2025 MOF forecast decreases the land need enough that no UGB expansion is required over the 30-year planning horizon (compared to an 88 ha expansion under 2024 MOF projections).

Total Growth	2024 MOF	2025 MOF	Resulting Change
Population (2024-2054)	272,900	224,600	-48,300
Housing Units (2024-2054)	117,270	97,540	-19,730

Table 1. Total Growth – Population and Housing Units – 2024 vs 2025 MOF Projections

Land Use Category	2024 MOF	2025 MOF	Resulting Change
Community Growth	1,476	1,054	-422
Industrial	88	No need for expansion	No need for expansion

Table 2. Land Needs Assessment Updates – 2024 vs 2025 MOF Projections

The updated LNA calculation incorporating the 2025 MOF population projections are appended to this report; however, for the purposes of the finalized LNA for Community Growth and Employment Areas, 2024 MOF will serve as methodological basis, recognizing Council Direction received on December 17, 2024, for the adoption of the LNA for Community Growth.

Calculations based on the 2025 MOF population projections, for Community Growth and Employment Areas, are included in Appendix “M” of this report.

6.5 Draft Privately Initiated UGB Expansion Policies and Guidelines

Significant policy changes related to process and timing for settlement area boundary expansions were introduced through *PPS 2024* and Bill 185, *Cutting Red Tape to Build More Homes Act, 2024*. The legislated changes remove the requirement for municipalities to complete a Municipal Comprehensive Review prior to settlement area boundary expansion and permit privately initiated applications for expansion. Civic Administration have prepared a draft Official Plan Amendment and Guideline document for continued consultation. Targeting Q4 2025, Civic Administration will return to Council with the final recommended Privately Initiated UGB Expansion Policies and Guidelines for endorsement and circulation to MMAH for Ministerial approval under Section 26 of the *Planning Act*.

The draft amendments would establish the Official Plan Amendment complete application requirements, evaluation criteria, and application submission and review process for Privately Initiated Urban Growth Boundary Expansion Applications. A Record of First Nations Consultation would be required as a complete application requirement to ensure early and meaningful Indigenous engagement related to proposed urban growth boundary expansion. A new study, “Growth Projections Assessment”, prepared by a Professional Land Economist (PLE) or qualified Registered Professional Planner (RPP) with experience in growth projections and land needs assessments would be required, and a valid peer review may also be required to satisfy complete application requirements. A new guideline document would identify data

requirements and considerations for a Growth Projections Assessment and Privately Initiated Urban Growth Boundary Expansion Application.

The Privately Initiated Urban Growth Boundary Expansion Application would be required to address policy 76 and the revised policy 78 of *The London Plan* by demonstrating that the proposed application:

- Protects public health, safety, and the environment.
- Minimizes financial impact on the municipality.
- Promotes compact growth within the existing Urban Growth Boundary.
- Represents a logical extension of existing neighborhoods or as a complete new neighborhood.
- Optimizes existing and planned infrastructure.
- Complies with Minimum Distance Separation requirements.
- Avoids expanding onto prime agricultural land, and prioritizing lower-class lands if expansion is unavoidable.
- Minimizes negative impacts on agriculture.
- Prohibits expansion onto specialty crop lands.
- Protects natural heritage areas.
- Considers market demand for housing, commercial, and industrial land needs not met by current supply.
- Is needed to meet PPS requirements for projected growth and minimum land required to accommodate future growth.

The Growth Projections Assessment would specifically address the revised policy 78 by evaluating the need for the boundary expansion to accommodate future community growth and/or future industrial growth for the defined planning horizon of *The London Plan*, and evaluating the conformity of the proposed expansion area with *The London Plan* policies, including the City Structure Plan.

This London Plan Amendment is intended as a policy review to determine appropriateness for inclusion of lands within the Urban Growth Boundary. All other subsequent development steps, such as secondary planning, plan of subdivision and site plan application, would be addressed through separate, existing City processes for planning and development applications.

The draft Official Plan Amendment with planning rationale and Guidelines Document are included in Appendix "D" of this report.

7.0 Next Steps

The following is a summary of next steps that will be taken related to the Official Plan Review and Urban Growth Boundary Review:

- Continue Indigenous, Community, and Development Industry consultations as part of UGB Review, ongoing Q3 and Q4 2025.
- Final Urban Growth Boundary Review (Community Growth and Employment Areas), targeted Q4 2025.
- Review of "ineligible and unsuitable" industrial lands and subsequent recommendations on appropriate redesignation of identified lands, if available, targeted Q1 2026.
- Continue to work with interested Indigenous communities to explore potential opportunities for urban reserves, including through the Federal Government's Additions to Reserve (ATR) policies.
- Subsequent phases of the Official Plan Review may include additional policy conformity exercises under the *Provincial Planning Statement*.

Conclusion

This report presents the final ILNA, which identifies the need for a UGB expansion of 88 hectares for Employment Areas, based on the Council approved 2024 Ministry of Finance Ontario Population Projections. This report also presents the draft UGB Review for Employment Areas and recommends an expansion of an estimated 85 ha to 92 ha of developable land in the Southeast candidate growth area to accommodate industrial land use.

The Ministry of Finance has released updated 2025 Ontario Population Projections which present significant reduction to the projected land needs when compared to the Land Needs Assessment methodology which is based on 2024 MOF projections. For consistency in process based on Council Direction in December 2024, the 2024 MOF projections will continue to be used for the purposes of the Land Needs Assessment.

In addition, this report presents a revised draft UGB expansion for Community Growth for continued consultation in response to the proposed Employment Area expansion. Updated Minimum Distance Separation calculations are presented based on further information provided by agricultural landowners.

Draft materials related to Privately Initiated Urban Growth Boundary Expansion Applications are presented for continued consultation. Final recommendations are targeted for Q4 2025.

A Final UGB Review will be presented to Council, anticipating Q4 2025, and incorporating any feedback received through the forthcoming consultations.

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Appendix A – Industrial Land Needs Assessment (Employment Areas)

2024-2054

Industrial Land Needs Assessment: Employment Areas

**Economic Services and Supports
City of London**

September 2025



Table of Contents

1	INTRODUCTION	3
1.1	Policy Context	4
1.1.1	The <i>Planning Act</i>	4
1.1.2	Provincial Planning Statement, 2024	4
1.1.3	City of London's Official Plan (<i>The London Plan</i>)	4
1.1.4	City of London's 2023 Industrial Land Development Strategy	5
1.1.5	Climate Emergency Screening Tool	6
1.2	Population and Employment Growth Forecast	6
1.2.1	Reference Growth Scenario (2021-2051)	6
1.2.2	Ministry of Finance Population Projections (2024-2054)	7
1.3	Methodology	7
1.3.1	Industrial Assumptions	7
1.3.2	Vacant Land Inventory	8
1.3.3	Contingency Land Supply	9
1.4	Key Definitions	10
1.5	Land Needs Assessment: Community Growth	12
2	INDUSTRIAL DEMAND AND SUPPLY	13
2.1	Population and Employment Growth and Forecast	13
2.2	Industrial Growth Forecast	14
2.3	Industrial Demand	15
2.4	Industrial Supply	16
2.4.1	Underutilized Supply	16
2.4.2	Vacant Supply	16
3	CONCLUSIONS	17
4	APPENDIX A – VLI Supply Analysis	18
5	APPENDIX B – VLI Supply Maps	50

1 INTRODUCTION

This report documents the findings of the City of London's Industrial Land Needs Assessment (ILNA) for Employment Areas. The ILNA has been undertaken as part of the Section 26 Official Plan Review of the City of London's Official Plan, *The London Plan*. The overall purpose of the Official Plan Review is to comprehensively update *The London Plan* to ensure its consistency with the *Provincial Planning Statement (PPS)* and other Provincial legislation. As such, the purpose of the ILNA is to evaluate the existing industrial land supply against projected demand based on growth in population and employment over the planning horizon of *The London Plan*.

The basis of the ILNA is population growth, employment, and industrial space projections for the 30-year planning horizon from 2024 to 2054. The Ministry of Finance 2024 population growth forecast was incorporated into the land need calculations to conform with new direction under the 2024 *Provincial Planning Statement* (effective October 2024) and represent higher growth trends than anticipated in prior forecasts. Assumptions approved by Municipal Council on December 13, 2022, were included to calculate land required to accommodate the anticipated population growth prepared by the province.

Undertaking the ILNA provides timely opportunity for the City of London to address the balance of land supply. Results from this study will also assist in the alignment of infrastructure and engineering requirements related to anticipated growth.

Based on the result of the ILNA, an analysis will be prepared to determine whether the Urban Growth Boundary (UGB) should be expanded to include additional lands into the City's urban area to accommodate the projected growth consistent with the provisions of the *PPS* and *The London Plan*. Should the result of the ILNA demonstrate the need for expansion, City Staff will bring forward a recommendation to Municipal Council requesting direction to initiate an Urban Growth Boundary Review. This report will not make specific recommendations on the areas to be considered for a subsequent Urban Growth Boundary Review or expansion. Instead, this report will analyze the supply of industrial land within the city's Urban Growth Boundary to determine how much additional industrial land will be required to meet projected demand. The location(s) of any approved UGB expansion will be analyzed once the Urban Growth Boundary Review has been initiated.

Finally, it should be noted that the community growth land needs (residential, commercial, and institutional) were evaluated in parallel with this ILNA and the findings have been presented in a separate Final Land Needs Assessment (Community Growth) report.

1.1 Policy Context

This Industrial Land Needs Assessment was developed within the context of the provincial legislation, new *Provincial Planning Statement* (2024), and the City of London's Official Plan (*The London Plan*).

1.1.1 The *Planning Act*

The *Planning Act* is provincial legislation governing land use planning in Ontario and outlines the statutory requirements for municipal planning documents and processes. The *Planning Act* also identifies matters of provincial interest in key areas, including the appropriate location of growth and development, the orderly development of safe and healthy communities, and the adequate provision of employment opportunities.

Section 26 of the *Planning Act* requires municipalities to undertake an official plan review within 10 years after a new plan is in effect, and no less frequently than every 5 years thereafter. The official plan review requires that all policies of the plan be updated to ensure they have regard to matters of provincial interest and are consistent with all legislation and policy statements issued by the Province.

1.1.2 *Provincial Planning Statement, 2024*

On April 10, 2024, the Province introduced a new draft *Provincial Planning Statement (PPS)*. The new 2024 *PPS* came into effect on October 20, 2024, and includes significant changes to growth management policy framework and additional direction on land needs assessment.

Policy 2.1.1 of the new *PPS* requires municipalities to base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance and allows them to modify the forecasts as appropriate.

Policy 2.1.3 provides that sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a minimum 20-year time horizon and a maximum of 30 years, however planning for infrastructure, public service facilities, strategic growth areas, and employment areas may extend beyond this time horizon.

The new *PPS* carries forward that municipalities shall protect employment areas that are located in proximity to major goods movement facilities and corridors for employment uses that require those locations (policy 2.8.2.2) and that municipalities shall also promote economic development and competitiveness by identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment (policy 2.8.1.1).

1.1.3 City of London's Official Plan (*The London Plan*)

The London Plan was adopted by City Council and approved by the Province in 2016. *The London Plan* horizon was first prepared under the 2014 *PPS* which required a maximum planning horizon of 20 years but was approved based on the 2020 *PPS* that requires a

planning horizon of up to 25 years. In April 2024, Council directed staff to apply a 25-year planning horizon for the purposes of the Land Needs Assessment. In December 2024, Council reevaluated the planning horizon based on the Community Growth Land Needs Assessment and directed staff to apply a 30-year planning horizon, which is consistent with the 2024 *PPS*.

The London Plan established a policy framework for growth management over the planning horizon and places an emphasis on growth of the industrial sector as a big part of London's prosperity, with almost one-third of all employment in London occurring on industrial land (policy 1104). To realize the vision for London's industrial land, there must first be an understanding of the needs and demands of the market, and planning for industrial lands in strategically attractive locations (policy 1113.2).

Where it is determined that an expansion of the City's Urban Growth Boundary is justified to meet required land needs through an Industrial Land Needs Assessment, criteria outlined in *The London Plan* (policy 76) must be satisfied. The criteria determine the preferred location for settlement area expansion and are consistent with the 2024 *PPS*.

Given that portions of *The London Plan* first came into effect in 2017, a review of the Plan is not required until 2027. However, the phased approach for the Section 26 Official Plan Review will create flexibility to meet the statutory requirement for the review by 2027 and expedite the ILNA process to determine the land required to accommodate the projected growth.

1.1.4 City of London's 2023 Industrial Land Development Strategy

The Industrial Land Development Strategy (ILDS) has guided the City in its planning, acquisition, servicing, and marketing of industrial land since 2001. This has led to an increase in attracting supplier companies and other investments that generate spin-off benefits for those living and working in London and allowed for the growth of London's industrial sector.

The first goal of the 2023 ILDS is to invest in developing the inventory of shovel-ready sites. The objective of this goal is to maintain a 10-year supply (494 acres / 200 hectares) of municipally-owned shovel-ready industrial land in prime strategic locations ensuring London is competitively situated to attract industrial investment. In order to achieve this objective, the following priority actions have been identified:

- Purchase lands that are suited to the needs of our targeted industries;
- Have a continuous budget to maintain inventory;
- Regularly identify lands which are ideal for development;
- Expand the UGB, as needed, to ensure the City has consistent and constant supply of marketable industrial lands;
- Develop lands, including budgeting, planning, and executing development of sites;
- Initiate all necessary Zoning By-law and Official Plan amendments to maximize the value of sites before land is put on the market;
- Ensure sites are adequately serviced to meet the needs of target industries;

- Ensure that UGB expansions align with the land needs requirements of our targeted industries; and
- Complete the Industrial Land Needs Assessment: Employment Areas that is currently underway

On May 9, 2023, Municipal Council adopted the 2023 Industrial Land Development Strategy, and resolved:

- a) the 2023 Industrial Land Development Strategy, as appended to the staff report dated May 9, 2023 as Appendix "A", BE ADOPTED as City Council's strategy for developing municipally-owned industrial land; it being noted that the Strategy is based on continuing the goal of developing and maintaining an ongoing supply of 200 hectares of strategically-located serviced industrial land; and
- d) the Civic Administration BE DIRECTED to undertake an Industrial Land Needs Assessment, which shall include the use of the Climate Emergency Screening Tool.

1.1.5 Climate Emergency Screening Tool

Through consultation with the City of London Climate Change, Environment, and Waste Management Division, it was determined that the relevant major climate change considerations for the Industrial Land Needs Assessment include land use changes and natural heritage loss / disconnection. In evaluating candidate locations for urban growth boundary expansion, minimization of impacts to natural heritage features will be considered. Land use changes that urbanize previously undeveloped land uses are an unavoidable part of making lands available for development, but consideration will be made for locations that will mitigate this impact at the time of the Urban Growth Boundary Review.

Many of the other climate change considerations that are relevant to industrial land development, such as carbon sequestration potential, embedded carbon, biodiversity loss, waste creation, etc. would be addressed at the site plan phase. Beginning in March 2023, development application reports presented to the Planning and Environment Committee contain a climate and environmental impact summary appendix where pertinent information to evaluate a proposed development's alignment with London's climate action commitments are made readily available.

1.2 Population and Employment Growth Forecast

1.2.1 Reference Growth Scenario (2021-2051)

In December 2022, Municipal Council endorsed the Reference Growth Scenario in the final report prepared by Watson and Associate Economists, entitled "Population, Housing and Employment Growth Projection Study, 2021-2051". The Reference Growth Scenario was endorsed as the City of London's corporate growth forecast, including for use in the *Planning Act* and *Development Charges Act* initiatives. Among other analyses, the Reference Growth Scenario updated the City of London's population, housing, and employment growth forecast

as well as projecting the employment activity rate and average floor space per worker being occupied by the growing employment sector.

1.2.2 Ministry of Finance Population Projections (2024-2054)

Notwithstanding that Council approved growth projections in December 2022, the Industrial Land Needs Assessment applies the 2024 Ministry of Finance population projections for land use purposes, which is now required as part of the 2024 PPS direction.

As per the new policy direction, the Ministry of Finance annual population projections (2024 to 2049) were applied to the land demand calculations. However, in order to assess the future land need requirements for the city, the assumptions from the Reference Growth Scenario related to employment activity rates, floor space per worker calculations, and gross floor area calculations continued to be utilized and were applied to the 2024 Ministry of Finance population projections.

The Ministry of Finance projects population growth for Middlesex County, in which the City of London is embedded. The share of London's population has been 84% of the Middlesex County population from 2001 to 2021, which is considered in the Council-endorsed projection scenario. For the purposes of the ILNA, the 84% of Middlesex County's growth projection was applied to determine the city's population growth forecasts over the 30-year planning horizon.

1.3 Methodology

The methodology applied to the Council-endorsed Reference Growth Scenario was both peer-reviewed and applied to previous iterations of growth modelling for City of London. The approach incorporated both the “top-down” cohort-survival forecast methodology and a “bottom up” household formation methodology. Noting the rigor behind the growth methodology, the demand assumptions have been maintained and applied to the Ministry of Finance 2024 population projections for the purposes of this land needs assessment.

1.3.1 Industrial Assumptions

Assumptions taken from the Council-endorsed Reference Growth Scenario for industrial growth accounted for the total space needs and density trends observed in London and across Ontario. Key variables incorporated into the land calculations included: anticipated intensification rate for industrial development, employment activity rate, floor space per worker, and floor area ratio.

To determine the potential impact of intensification, historic building permit activity was reviewed to verify the extent of intensification for industrial development. Industrial land demand calculations contemplated that 25% of the demand will be met through intensification of underutilized lands over the 30-year horizon, based on review of historic building permit activity.

An employment activity rate is defined as the number of local jobs per capita for a municipality. The employment activity rate within the sector is expected to remain relatively consistent over the planning horizon, ranging from 0.081 in 2024 to 0.076 in 2054. The average floor space per worker (FSW) is a calculated value indicative of expected space needs per employee. The industrial sector FSW assumption is 111m² (1,200ft²) which is representative of industrial density trends noted in historic data and comparable municipal examples. This assumption accounts for varying characteristics and scales of land uses within the industrial sector, noting that space requirements are not consistent across the sector. Both the employment activity rate and average floor space per worker were incorporated into the gross floor area (GFA) required to accommodate industrial employment growth. Gross floor area is defined in the City of London Zoning By-law No. Z.-1 as the sum total of the gross horizontal areas of the several floors of the building or buildings on a lot, measured from the exterior faces of the exterior walls or from the centreline of the common wall separating two buildings.

To convert the demand for industrial GFA to a demand for land, floor area ratio (FAR) assumptions were utilized. FAR is defined in the City of London Zoning By-law No. Z.-1 as the gross floor area, in square metres, divided by the area of the lot, in square metres, and is expressed in a ratio of gross floor area to one square metre of lot area. An average FAR of 0.23 was assumed for the sector, again noting variations depending on form and use. The industrial FAR and intensification rate were established in previous land needs assessments based on a review of existing sites and building permits. The FAR and intensification rate were carried forward for the purposes of this Industrial Land Needs Assessment based on continued relevancy and industry trends.

Table 1 shows the industrial assumptions incorporated into the GFA calculations.

	Intensification	Floor Space per Worker Assumption	Floor Area Ratio (FAR) Assumption
Industrial	25%	111m ² (1,200ft ²)	0.23

Table 1. Industrial GFA calculations (2021-2051)

1.3.2 Vacant Land Inventory

The City's Vacant Land Inventory (VLI) tracks vacant land for potential development within the City's Urban Growth Boundary and is comprised of two different studies: residential and non-residential (i.e., industrial, commercial, and institutional). The VLI is updated quarterly to reflect the most up-to-date capacity for future residential and non-residential development at a snapshot in time. The VLI includes categories of development for vacant lands as well as development applications within the "development pipeline".

It should also be noted that the VLI supply includes six sites for industrial land conversion to a non-industrial use that were approved by Council on April 2, 2024.

VLI Supply Analysis

For the purposes of the Industrial Land Needs Assessment, further analysis of the VLI was conducted to determine the suitability and market-readiness of London's vacant industrial land supply, in conformity with policy 2.8.1.1 in the 2024 PPS which states that municipalities “...shall promote economic development and competitiveness by...identifying strategic sites for investment, **monitoring the availability and suitability of employment sites, including market-ready sites**, and seeking to address potential barriers to investment.” [Emphasis added].

To evaluate the amount of developable industrial land in the City of London, the first step of the VLI supply analysis removed ineligible land (see Definitions below for list of criteria) from consideration. The ineligible land, if left in the vacant industrial land supply, would inflate the supply calculations by including land that cannot be developed upon. The second step of the VLI supply analysis removed unsuitable land (see Definitions below for list of criteria) from consideration. The unsuitable land, if left in the vacant industrial land supply, would also inflate the supply calculations with land that is not suitable or market ready. The VLI supply analysis can be found in Appendix A.

2012 Industrial Lands Study

In 2012, R.W. Panzer, a planning consultant for the City of London, conducted an industrial lands study (Panzer Report) to determine the supply and demand for industrial land as part of the City of London's previous Comprehensive Review. In the Panzer Report, it is noted that a large portion of the VLI is not suitable to market requirements, and that much of this land is unlikely to be developed for industrial uses.

For the purposes of the Industrial Land Needs Assessment, an analysis was conducted to determine how much of the current VLI has been vacant since the Industrial Lands Study in 2012 to evaluate the validity of the Panzer Report's conclusions about the lack of suitability of these lands. Through this analysis, it was calculated that approximately 89% of the suitable land inventory has been vacant since at least 2012. This data suggests that although it appears the City of London has a robust inventory of vacant industrial land, there is no market uptake on much of these lands, and consideration should be given to including additional land that better meets market-readiness.

1.3.3 Contingency Land Supply

As part of this Section 26 Official Plan review, the planning horizon has been extended from 20 years to 30 years. This means that an additional ten years of growth is required to be included within population, housing, and employment space forecasts and an additional ten-year supply of land is also required to be available within the City's Urban Growth Boundary.

The City is required to review and update its Official Plan at a frequency of no more than every five years after the initial review, which must occur within ten years after an Official Plan comes into effect (*Planning Act*, s. 26(1.1)(b)). By introducing a 30-year planning horizon, flexibility is built into the growth management process.

1.4 Key Definitions

The Industrial Land Needs Assessment allocates industrial land supply into two categories of vacant land and underutilized land as identified in the Vacant Land Inventory (VLI). Appendix B illustrates the locations of land in the categories of underutilized, vacant, vacant but ineligible, and vacant but unsuitable for the City of London's industrial land identified in the VLI. Some of the terms used in this report are defined below, such as Urban Growth Boundary, Employment Areas, Intensification, Underutilized Land, Vacant Land, Eligible Industrial Land Supply, and Suitable Industrial Land Supply. It should be noted that both vacant and underutilized do not represent specific land use designations but are intended for use as planning and monitoring tools.

Urban Growth Boundary

The Urban Growth Boundary (UGB), as defined in *The London Plan*, means the boundary beyond which urban uses will not be permitted. Generally, the UGB separates the urban areas of the city from the rural areas of the city.

Employment Areas

The 2024 *PPS* defines Employment Areas as those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. An employment area also includes areas of land described by subsection 1(1.1) of the *Planning Act*. Uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above.

For the purposes of the Industrial Land Needs Assessment, Employment Areas include the Place Types of Light Industrial, Heavy Industrial, and Future Industrial Growth. The Commercial Industrial Place Type was not included in the definition of Employment Areas in accordance with the above Employment Area definition in the 2024 *PPS*, as well as subsection 1(1.1) of the *Planning Act*.

The Commercial Industrial Place Type was instead evaluated under the Commercial Land Supply in the concurrent Land Needs Assessment: Community Growth report.

Intensification

Intensification, as defined in the 2024 *PPS*, means the development of a property, site, or area at a higher density than currently exists through:

- a. Redevelopment, including the reuse of brownfield sites and underutilized shopping malls and plazas;
- b. The development of vacant and/or underutilized lots within previously developed areas;
- c. Infill development; and
- d. The expansion or conversion of existing buildings.

For the purpose of the Industrial Land Needs Assessment, intensification is considered development that occurs on underutilized industrial land.

Underutilized Land

Underutilized Land means a portion of an existing developed parcel is vacant. This land is in excess of what was initially required and is typically retained for use in potential future expansions. Underutilized land is owned by the existing user and is not available to the general market for new developments. Development on this land is considered intensification for the purpose of the Industrial Land Needs Assessment.

Vacant Land

Vacant Land means the entire parcel has not been previously developed upon for its current planned function. This land is available for new developments.

Eligible Industrial Land Supply

Eligible Industrial Land Supply means the land that remains after the below Ineligible Land Criteria are applied to the Vacant Land Inventory supply and removed from supply calculations. Ineligible Land Criteria negatively impact the capability of lands to accommodate industrial development. The removal of these lands meets the 2024 PPS criteria in policy 2.8.1.1(b) which states that municipalities “*...shall promote economic development and competitiveness by...providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities...*”.

Ineligible Land Criteria

1. Included non-conforming Place Types (such as environmental land).

Note: Only the land area of the non-conforming Place Types was removed, the industrial portions were not removed.

2. Converted to other place types through the industrial land conversions.
3. Located within the Regulatory Flood Line.
4. Located within the Dingman Creek Screening Area.
5. Large environmental features eliminated frontage or access to the developable industrial portions of the property, making them unfit for development.
6. Are generally small in size and did not meet the minimum Light Industrial zoning requirements of 0.25 acres in area and / or 30 metres frontage (Section 40, Table 40.3, Zoning By-law No. Z.-1).

Note: Parcels that did not meet the zoning requirements but were able to develop contiguously with adjacent parcels (such as those that share common ownership with abutting lands) or will likely be able to develop with a minor variance are not considered ineligible.

Suitable Industrial Land Supply

Suitable Industrial Land Supply means the land that remains after the below Unsuitable Land Criteria are applied to the Eligible Industrial Land Supply and removed from supply calculations. Unsuitable Land Criteria negatively impact the suitability of lands to meet the requirements of the market. The removal of these lands meets the 2024 *PPS* criteria in policy 2.8.1.1(c) which states that municipalities “...shall promote economic development and competitiveness by...identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment.”

Unsuitable Land Criteria

1. Adjacent to sensitive land uses, such as Residential Place Types (2024 *PPS* policy 2.8.1.1).
2. More than 1km from any major goods movement corridor, specifically Veterans Memorial Parkway, Highway 401, or Highway 402 (2024 *PPS* policy 2.8.1.2).
3. Lack of available water or sewer infrastructure, with no plans for service extension to the area (2024 *PPS* policy 2.8.2.1).

The Industrial Land Needs Assessment uses the data collected in the VLI to quantify the available supply of vacant land and underutilized land to evaluate overall land requirements to determine whether an expansion of the Urban Growth Boundary is justified. While the underutilized land is the focus of intensification with 25% of industrial developments occurring as infill development, the demand for vacant land to accommodate the projected growth is the primary factor determining whether additional lands will be required. If opportunities to accommodate growth do not exist within the Suitable Vacant Land Inventory, then the City will need to consider an expansion to the Urban Growth Boundary to add additional lands.

Dingman Creek Screening Area

The Upper Thames River Conservation Authority is updating its floodplain modelling for the Dingman Creek. Until completion of the modelling, a broader “screening area” has been identified for the floodplain and surrounding area. Due to timing of the updated floodplain modelling associated with the Dingman Creek Environmental Assessment, the screening area is included in the Ineligible Land Criteria. All potential industrial development within the Dingman Creek Screening Area has been removed from the Suitable Industrial Land Supply due to uncertainty around the ability to meet the requirements for Conservation Authority permitting. Continued monitoring will follow approval of the floodplain mapping.

1.5 Land Needs Assessment: Community Growth

A review of residential, commercial, and institutional land requirements has been undertaken in a separate study to determine if there is a need to consider the inclusion of additional land

into the City's Urban Growth Boundary to accommodate projected strategic community growth. This report was approved by Municipal Council on December 17th, 2024.

2 INDUSTRIAL DEMAND AND SUPPLY

2.1 Population and Employment Growth and Forecast

The most recent Ministry of Finance projections indicate that the Middlesex County permanent population was approximately 592,902 in 2024, an increase from 517,900 in 2021. The City of London accounted for approximately 84% of total population growth in the Middlesex County from 2001 to 2021. Accordingly, the City's permanent population is estimated to be 497,219 people in 2024.

The City of London is anticipated to grow to approximately 770,100 people in 2054, increasing by approximately 272,900 people. This represents an average annual growth rate of 1.8% over the 30 years. Table 2 below shows projected growth and annual growth rates for each 5-year period.

There are considerations related to demographic, economics and socioeconomics that are anticipated to influence population growth trends in the City of London, as follows:

- The City's population is aging, driven by the Baby Boomer age group. The 75 years plus age group (including Baby Boomers) is expected to increase from 9% to 12% over the forecast. The adult population of 20 to 54 years old is projected to be the largest age cohort group but is projected to decline in relative terms from 48% to 47% of total population.
- The City is anticipated to be reliant on net migration as a source of population growth as opposed to natural increase (births minus deaths). Net migrations are higher than the 20-year historical average and assume the National Target of 500,000 international entrants will be met and later exceeded over the course of the growth forecast – reaching levels 250% higher than local historic trends. The Ministry of Finance growth forecast does not contemplate a longer-term reduction in immigration levels.
- Forecasted net migration trends are reflective of steady growth anticipated in local and regional economies and forecasted work-at-home opportunities with over 90% of migrants projected to be working-aged adults and children. Net migration is also reflective of the perceived attractiveness of the City to “empty nesters” and retired/semi-retired persons re-locating from other communities.
- Population growth associated with natural increase (births minus deaths) is forecast to continue decline due to the aging of the City's population.

Year	Population	Annual Growth	Annual Growth Rate
2024	497,200	-	-
2029	534,000	7,400	1.5%
2034	580,400	9,300	1.7%
2039	626,600	9,200	1.6%
2044	673,400	9,400	1.5%
2049	721,100	9,500	1.4%
2054	770,100	9,800	1.4%
Total (2024-2054)	272,900	9,100	1.8%

Table 2. Population Growth Forecasts (2024-2054)

The most recent 2024 Ministry of Finance population forecast projects an additional 6,900 persons at the end of 2046, the final year for the 2023 Ministry of Finance projection. With an additional 10 years added to the 2024 growth forecast, there is a population increase of 104,100 compared to the previous release. Correspondingly, the employment growth demand is forecast to increase over the 30-year period.

2.2 Industrial Growth Forecast

The unprecedented magnitude of the COVID-19 pandemic was understandably not predicted nor accounted for within original growth assumptions included in *The London Plan*. The pandemic was a significant disruptive force which resulted in a dramatic shift in operational processes, work stoppages, and job losses. However, the Reference Growth Scenario endorsed by Council in 2022 did consider the impacts of the pandemic. Through the 2021-2051 growth projections, City Staff have been able to incorporate post-pandemic data trends into refined estimates for the future growth planning – most notably the strong recovery following the pandemic.

The Reference Growth Scenario indicates that as of 2021, the largest employment sector in the City of London was healthcare and social assistance (16%), followed by retail trade (11%), educational services (10%), and manufacturing (8%) – the remainder is divided amongst sectors with smaller shares. Under the Reference Growth Scenario, the City of London's industrial employment base was projected to grow from 35,300 jobs in 2021 to 49,300 jobs by 2051 at an average annual increase of roughly 1.3%. This represents approximately 14,000 additional jobs between 2021 and 2051.

As previously noted, the Ministry of Finance growth forecast is representative of a more optimistic growth scenario compared to previous population growth forecasting and as such, the employment base is anticipated to grow at a higher rate. Under the Ministry of Finance population forecast, there is projected growth from 40,270 industrial jobs in 2024 to 58,530 industrial jobs by 2054 at an average annual increase of roughly 1.5%. This represents approximately 18,260 additional industrial jobs between 2024 and 2054, approximately 4,260

more than previously projected by the Reference Growth Scenario. Industrial employment growth and the annual growth rate are noted in Table 3. The industrial sector is expected to account for 14% of the total employment growth share, noting that manufacturing (8%) is the fourth largest employment source within the City of London.

5-Year Period	Employment Growth	Annual Growth
2024-2029	2,450	1.2%
2029-2034	3,130	1.5%
2034-2039	3,020	1.3%
2039-2044	3,660	1.5%
2044-2049	2,990	1.1%
2049-2054	3,010	1.1%
Total (2024-2054)	18,260	1.5%

Table 3. Industrial Growth Forecasts (2024-2054)

2.3 Industrial Demand

The industrial sector is projected to experience strong demands for new floor area to service population growth. The sector is projecting to grow by an average of 67,562m² of new floor area annually over the 30-year planning horizon. This growth rate is expected to result in approximately 2,026,860m² of new industrial GFA to be developed over the 30-year forecast. Given a floor area ratio assumption of 0.23, it is anticipated that 885 hectares of industrial land will be required to accommodate new industrial floor area, with 25% of new floor area (221 hectares) occurring as a result of intensification of existing underutilized industrial land, and the remaining 664 hectares of industrial demand requiring vacant industrial land for new developments.

5-Year Period	GFA Required (m ²)	Total Land Required (ha)	Vacant Land Required (ha)
2024-2029	271,950	119	89
2029-2034	347,430	152	114
2034-2039	335,220	146	110
2039-2044	406,260	177	133
2044-2049	331,890	145	109
2049-2054	334,110	146	109
Total (2024-2054)	2,026,860	886	664

Table 4. Industrial Land Needs (2024-2054)

2.4 Industrial Supply

2.4.1 Underutilized Supply

This section of the report provides a summary of the supply of land within the Underutilized Land category to accommodate industrial intensification. The Underutilized Supply includes land within the Light Industrial, Heavy Industrial, and Future Industrial Growth Place Types that is in excess of the need required by the existing development on a given parcel. This land is allocated for future expansions to existing developments and accounts for the 25% intensification contemplated for industrial development.

The VLI underutilized industrial land supply was calculated at 290 hectares. Based on the results of this study, there is sufficient underutilized land available to accommodate the approximate demand of 221 hectares of industrial intensification.

2.4.2 Vacant Supply

This section of the report provides a summary of the supply of land within the Vacant Land category to accommodate new industrial developments. The Vacant Supply includes land within the Light Industrial, Heavy Industrial, and Future Industrial Growth Place Types that is currently vacant.

The VLI vacant industrial land supply was initially calculated at 1043 hectares. After removing the areas that met the Ineligible Land Criteria (see Definitions), the eligible VLI vacant industrial land supply was calculated at 784 hectares. After removing the areas that met the Unsuitable Land Criteria (see Definitions), the suitable VLI vacant industrial land supply was calculated at 575 hectares. It is important to use the suitable land supply for industrial land needs calculations because promoting economic development and competitiveness (2024 PPS policy 2.8.1.1) is not conducive within the unsuitable industrial land supply.

Table 5 identifies the available vacant industrial land supply over the 30-year planning horizon. Based on the results of this study, the City of London is anticipated to have a deficit of 88 hectares of industrial land for development by 2054.

5-Year Period	Suitable Vacant Land Required (ha)	Remaining Suitable Vacant Land Supply (ha)
-	-	575
2024-2029	89	486
2029-2034	114	372
2034-2039	110	262
2039-2044	133	129
2044-2049	109	21
2049-2054	109	- 88

Table 5. Industrial Vacant Land Supply (2024-2054)

3 CONCLUSIONS

Based on the assumptions and methodology, there is a need for approximately 664 hectares of vacant land within the Urban Growth Boundary for industrial development over the 30-year planning horizon under *The London Plan*.

There will be a deficit of 88 hectares of suitable vacant industrial lands to accommodate the projected industrial growth in the City of London. This demonstrates that there is an identified need for an expansion to the City's Urban Growth Boundary to accommodate industrial growth by 2054.

There is also approximately 259 hectares of land that meets the Ineligible Land Criteria and 209 hectares of land that meets the Unsuitable Land Criteria; these lands should be evaluated for potential redesignation to a more suitable Place Type.

4 APPENDIX A – VLI Supply Analysis

X
Ineligible 1
Ineligible 2
Ineligible 3
Ineligible 4
Ineligible 5
Ineligible 6
Unsuitable 1
Unsuitable 2
Unsuitable 3

Criteria applicable to site.

Criteria not applicable to site.

Criteria not considered – underutilized sites were not evaluated for their eligibility or suitability; ineligible sites were not evaluated for their suitability.

Place Type is not industrial.

Place Type has been converted and is no longer industrial.

Within the Regulatory Flood Line.

Within the Dingman Creek Screening Area.

No access to developable area due to environmental features.

Does not conform with the Light Industrial zoning requirements for size (0.25 ac) and / or frontage (30 m).

Adjacent to Residential Place Type.

More than 1 km from a Transportation Corridor.

Lack of readily available water or sewer infrastructure.

Map 1 - 8	0.25	Underutilized											
Map 1 - 9	0.08	Underutilized											
Map 1 - 10	0.32	Underutilized											
Map 1 - 11	0.88	Underutilized											
Map 1 - 12	1.84	Vacant											
Map 1 - 13	4.50	Vacant											
Map 1 - 14	1.99	Vacant											
Map 1 - 15	0.20	Vacant											
Map 1 - 16	1.16	Vacant											
Map 1 - 17	0.40	Vacant											
Map 1 - 18	0.49	Vacant											
Map 1 - 19	1.36	Vacant											
Map 1 - 20	1.28	Vacant											
Map 1 - 21	0.95	Vacant											
Map 1 - 22	6.21	Unsuitable											X
Map 1 - 23	2.69	Underutilized											
Map 1 - 24	0.56	Vacant											
Map 2 - 25	0.47	Underutilized											

Map 2 - 26	1.31	Underutilized										
Map 1 - 27	0.16	Ineligible							X			
Map 1 - 28	1.48	Vacant										
Map 1 - 29	1.47	Vacant										
Map 1 - 30	1.89	Vacant										
Map 1 - 31	0.22	Vacant										
Map 1 - 32	5.99	Vacant										
Map 1 - 33	0.90	Vacant										
Map 1 - 34	0.90	Vacant										
Map 1 - 35	14.90	Vacant										
Map 2 - 36	4.30	Vacant										
Map 2 - 37	4.36	Ineligible							X			
Map 2 - 38	2.60	Underutilized										
Map 2 - 39	12.41	Underutilized										
Map 2 - 40	0.14	Underutilized										
Map 2 - 41	0.81	Underutilized										
Map 1 - 42	9.94	Vacant										
Map 1 - 43	1.76	Vacant										

Map 1 - 44	1.20	Vacant										
Map 1 - 45	1.00	Vacant										
Map 1 - 46	1.11	Underutilized										
Map 1 - 47	0.17	Underutilized										
Map 1 - 48	3.74	Vacant										
Map 1 - 49	0.02	Ineligible	X									
Map 1 - 50	0.39	Vacant										
Map 1 - 51	0.78	Vacant										
Map 1 - 52	1.80	Vacant										
Map 1 - 53	0.26	Vacant										
Map 1 - 54	0.26	Vacant										
Map 1 - 55	0.27	Vacant										
Map 1 - 56	0.24	Vacant										
Map 1 - 57	0.29	Vacant										
Map 1 - 58	0.25	Vacant										
Map 1 - 59	0.37	Underutilized										
Map 1 - 60	0.25	Underutilized										
Map 1 - 61	0.30	Vacant										

Map 1 - 62	0.37	Underutilized										
Map 1 - 63	0.64	Vacant										
Map 1 - 64	0.11	Ineligible	X									
Map 1 - 65	8.34	Vacant										
Map 1 - 66	11.65	Vacant										
Map 1 - 67	1.76	Underutilized										
Map 1 - 68	7.75	Vacant										
Map 1 - 69	3.64	Vacant										
Map 1 - 70	8.10	Vacant										
Map 1 - 71	0.05	Vacant										
Map 2 - 72	4.80	Underutilized										
Map 2 - 73	9.62	Underutilized										
Map 2 - 74	1.82	Vacant										
Map 2 - 75	5.00	Underutilized										
Map 2 - 76	13.94	Underutilized										
Map 2 - 77	2.59	Underutilized										
Map 2 - 78	0.59	Underutilized										
Map 2 - 79	1.31	Underutilized										

Map 2 - 80	0.04	Underutilized										
Map 2 - 81	0.65	Underutilized										
Map 2 - 82	0.76	Unsuitable									X	
Map 2 - 83	0.84	Underutilized										
Map 2 - 84	0.41	Unsuitable									X	
Map 2 - 85	0.56	Unsuitable									X	
Map 2 - 86	0.37	Underutilized										
Map 2 - 87	0.37	Underutilized										
Map 2 - 88	0.13	Underutilized										
Map 2 - 89	0.32	Underutilized										
Map 2 - 90	0.75	Unsuitable									X	
Map 2 - 91	0.44	Underutilized										
Map 8 - 92	0.15	Underutilized										
Map 8 - 93	0.06	Ineligible								X		
Map 8 - 94	0.52	Unsuitable									X	
Map 8 - 95	0.37	Unsuitable									X	
Map 8 - 96	0.24	Unsuitable									X	
Map 8 - 97	0.05	Unsuitable									X	

Map 8 - 98	0.05	Unsuitable								X	
Map 8 - 99	0.17	Unsuitable								X	
Map 8 - 100	0.76	Unsuitable								X	
Map 8 - 101	0.14	Unsuitable								X	
Map 8 - 102	0.12	Unsuitable								X	
Map 8 - 103	0.04	Ineligible		X							
Map 8 - 104	0.30	Ineligible		X							
Map 8 - 105	0.03	Ineligible		X							
Map 8 - 106	0.45	Ineligible		X							
Map 8 - 107	0.30	Ineligible		X							
Map 8 - 108	0.21	Ineligible		X							
Map 8 - 109	0.08	Ineligible		X							
Map 8 - 110	0.10	Ineligible		X							
Map 8 - 111	4.16	Ineligible		X							
Map 8 - 112	0.70	Unsuitable		X							
Map 8 - 113	0.08	Underutilized									
Map 8 - 114	0.32	Unsuitable								X	
Map 8 - 115	0.70	Ineligible	X								

Map 8 - 116	0.35	Unsuitable								X	
Map 8 - 117	0.25	Underutilized									
Map 8 - 118	0.83	Ineligible						X			
Map 8 - 119	0.22	Unsuitable								X	
Map 8 - 120	0.11	Underutilized									
Map 8 - 121	0.69	Underutilized									
Map 8 - 122	0.43	Unsuitable								X	
Map 8 - 123	0.29	Unsuitable								X	
Map 8 - 124	0.79	Unsuitable								X	
Map 8 - 125	0.04	Underutilized									
Map 8 - 126	0.42	Unsuitable								X	
Map 8 - 127	0.44	Underutilized									
Map 8 - 128	0.21	Underutilized									
Map 8 - 129	0.66	Underutilized									
Map 8 - 130	0.72	Underutilized									
Map 8 - 131	0.40	Underutilized									
Map 3 - 132	2.58	Underutilized									
Map 3 - 133	0.21	Underutilized									

Map 3 - 134	0.73	Underutilized										
Map 3 - 135	0.53	Vacant										
Map 3 - 136	0.41	Underutilized										
Map 3 - 137	11.08	Vacant										
Map 3 - 138	0.88	Unsuitable										X
Map 3 - 139	0.42	Underutilized										
Map 3 - 140	0.73	Underutilized										
Map 3 - 141	2.45	Vacant										
Map 3 - 142	1.02	Vacant										
Map 3 - 143	0.63	Vacant										
Map 3 - 144	0.51	Vacant										
Map 3 - 145	4.70	Underutilized										
Map 3 - 146	5.45	Underutilized										
Map 3 - 147	1.01	Unsuitable										X
Map 3 - 148	1.89	Vacant										
Map 3 - 149	0.89	Underutilized										
Map 3 - 150	0.30	Underutilized										
Map 3 - 151	1.18	Vacant										

Map 3 - 152	0.91	Underutilized											
Map 3 - 153	1.47	Underutilized											
Map 3 - 154	2.01	Underutilized											
Map 3 - 155	4.58	Underutilized											
Map 3 - 156	17.60	Underutilized											
Map 3 - 157	10.87	Vacant											
Map 3 - 158	0.41	Underutilized											
Map 2 - 159	1.72	Unsuitable										X	
Map 2 - 160	2.00	Unsuitable										X	
Map 2 - 161	0.15	Unsuitable										X	
Map 2 - 162	2.81	Underutilized											
Map 3 - 163	0.56	Vacant											
Map 3 - 164	0.12	Underutilized											
Map 3 - 165	0.16	Underutilized											
Map 3 - 166	0.09	Underutilized											
Map 3 - 167	0.19	Underutilized											
Map 3 - 168	1.94	Unsuitable											X
Map 3 - 169	3.08	Underutilized											

Map 3 - 170	0.54	Vacant										
Map 3 - 171	1.58	Unsuitable								X		
Map 3 - 172	1.05	Underutilized										
Map 3 - 173	1.95	Unsuitable								X		
Map 3 - 174	3.24	Unsuitable								X		
Map 3 - 175	0.22	Underutilized										
Map 3 - 176	13.43	Unsuitable								X		
Map 3 - 177	12.35	Underutilized										
Map 3 - 178	15.38	Unsuitable									X	
Map 3 - 179	5.59	Underutilized										
Map 3 - 180	0.87	Vacant										
Map 3 - 181	0.38	Underutilized										
Map 3 - 182	0.35	Underutilized										
Map 3 - 183	0.31	Unsuitable								X		
Map 3 - 184	0.31	Unsuitable								X		
Map 3 - 185	0.32	Unsuitable								X		
Map 3 - 186	0.16	Underutilized										
Map 3 - 187	0.51	Underutilized										

Map 3 - 188	0.34	Vacant									
Map 3 - 189	0.12	Underutilized									
Map 3 - 190	0.20	Vacant									
Map 3 - 191	5.00	Underutilized									
Map 3 - 192	0.21	Underutilized									
Map 3 - 193	0.12	Underutilized									
Map 3 - 194	0.08	Underutilized									
Map 3 - 195	1.06	Unsuitable							X		
Map 3 - 196	0.36	Ineligible	X								
Map 4 - 197	0.14	Underutilized									
Map 4 - 198	0.45	Vacant									
Map 4 - 199	0.05	Ineligible			X						
Map 4 - 200	0.87	Underutilized									
Map 4 - 201	0.29	Underutilized									
Map 4 - 202	0.40	Underutilized									
Map 4 - 203	0.47	Underutilized									
Map 4 - 204	0.29	Underutilized									
Map 4 - 205	0.37	Underutilized									

Map 4 - 206	0.19	Underutilized											
Map 4 - 207	0.09	Ineligible		X									
Map 4 - 208	0.09	Ineligible		X									
Map 4 - 209	0.24	Ineligible		X									
Map 4 - 210	12.91	Underutilized											
Map 4 - 211	0.98	Underutilized											
Map 4 - 212	2.00	Underutilized											
Map 4 - 213	0.15	Unsuitable								X			
Map 4 - 214	0.21	Unsuitable								X			
Map 4 - 215	0.11	Underutilized											
Map 4 - 216	0.21	Underutilized											
Map 4 - 217	0.10	Underutilized											
Map 4 - 218	0.08	Underutilized											
Map 4 - 219	0.44	Vacant											
Map 4 - 220	0.18	Underutilized											
Map 4 - 221	0.23	Underutilized											
Map 4 - 222	0.99	Unsuitable								X			
Map 4 - 223	1.32	Unsuitable								X			

Map 4 - 224	1.35	Unsuitable							X		
Map 4 - 225	1.36	Unsuitable							X		
Map 4 - 226	1.18	Unsuitable							X		
Map 4 - 227	1.07	Unsuitable							X		
Map 4 - 228	1.34	Unsuitable							X		
Map 4 - 229	1.07	Underutilized									
Map 4 - 230	2.44	Underutilized									
Map 4 - 231	2.23	Vacant									
Map 4 - 232	1.72	Underutilized									
Map 4 - 233	1.86	Underutilized									
Map 4 - 234	0.37	Underutilized									
Map 4 - 235	0.77	Underutilized									
Map 4 - 236	2.30	Underutilized									
Map 4 - 237	2.78	Underutilized									
Map 4 - 238	0.30	Underutilized									
Map 6 - 239	4.83	Unsuitable								X	
Map 6 - 240	0.01	Ineligible	X								
Map 6 - 241	3.61	Unsuitable								X	

Map 6 - 242	0.19	Ineligible	X									
Map 6 - 243	0.68	Underutilized										
Map 6 - 244	0.22	Underutilized										
Map 6 - 245	0.15	Underutilized										
Map 6 - 246	0.19	Underutilized										
Map 6 - 247	0.54	Underutilized										
Map 6 - 248	6.01	Vacant										
Map 5 - 249	0.14	Underutilized										
Map 5 - 250	0.45	Unsuitable								X		
Map 5 - 251	0.60	Underutilized										
Map 5 - 252	1.16	Underutilized										
Map 5 - 253	0.70	Underutilized										
Map 5 - 254	0.61	Underutilized										
Map 5 - 255	0.99	Underutilized										
Map 5 - 256	0.05	Underutilized										
Map 5 - 257	0.20	Unsuitable									X	
Map 5 - 258	0.15	Underutilized										
Map 5 - 259	0.20	Underutilized										

Map 5 - 260	1.02	Underutilized											
Map 5 - 261	0.15	Underutilized											
Map 5 - 262	0.20	Underutilized											
Map 5 - 263	0.20	Underutilized											
Map 5 - 264	0.71	Underutilized											
Map 5 - 265	1.84	Unsuitable											
Map 5 - 266	0.81	Unsuitable											
Map 5 - 267	0.81	Unsuitable											
Map 5 - 268	0.19	Unsuitable											
Map 5 - 269	0.54	Unsuitable											
Map 5 - 270	3.33	Underutilized											
Map 5 - 271	1.54	Unsuitable											
Map 5 - 272	3.45	Unsuitable											
Map 5 - 273	1.51	Underutilized											
Map 5 - 274	0.23	Vacant											
Map 5 - 275	0.42	Unsuitable											
Map 5 - 276	0.44	Unsuitable											
Map 5 - 277	2.28	Unsuitable											

Map 8 - 278	0.57	Unsuitable							X		
Map 8 - 279	0.23	Underutilized									
Map 8 - 280	0.30	Underutilized									
Map 8 - 281	0.15	Underutilized									
Map 8 - 282	0.11	Unsuitable							X		
Map 8 - 283	0.13	Unsuitable							X		
Map 8 - 284	0.17	Unsuitable							X		
Map 8 - 285	0.04	Ineligible						X			
Map 8 - 286	0.16	Unsuitable							X		
Map 8 - 287	0.24	Underutilized									
Map 8 - 288	2.88	Ineligible	X								
Map 6 - 289	53.15	Vacant									
Map 6 - 290	1.05	Vacant									
Map 6 - 291	11.84	Vacant									
Map 6 - 292	14.79	Ineligible						X			
Map 6 - 293	19.66	Unsuitable							X		
Map 6 - 294	0.09	Ineligible						X			
Map 6 - 295	3.42	Unsuitable									X

Map 6 - 296	0.14	Ineligible			X							
Map 6 - 297	9.11	Unsuitable										X
Map 7 - 298	12.71	Vacant										
Map 7 - 299	18.42	Vacant										
Map 7 - 300	4.09	Vacant										
Map 7 - 301	0.05	Ineligible			X							
Map 7 - 302	3.37	Vacant										
Map 7 - 303	2.74	Vacant										
Map 7 - 304	11.62	Vacant										
Map 7 - 305	9.91	Vacant										
Map 7 - 306	1.60	Vacant										
Map 7 - 307	1.22	Vacant										
Map 7 - 308	2.12	Vacant										
Map 7 - 309	8.09	Vacant										
Map 7 - 310	3.49	Vacant										
Map 7 - 311	0.47	Ineligible			X							
Map 7 - 312	1.00	Underutilized										
Map 7 - 313	1.21	Underutilized										

Map 7 - 314	3.61	Underutilized										
Map 7 - 315	3.67	Underutilized										
Map 7 - 316	1.61	Vacant										
Map 7 - 317	3.74	Underutilized										
Map 7 - 318	0.69	Underutilized										
Map 7 - 319	0.53	Underutilized										
Map 7 - 320	2.42	Underutilized										
Map 7 - 321	0.79	Unsuitable				X						
Map 7 - 322	0.41	Unsuitable				X						
Map 7 - 323	5.55	Unsuitable				X						
Map 7 - 324	2.63	Vacant										
Map 7 - 325	0.04	Underutilized										
Map 7 - 326	2.43	Vacant										
Map 7 - 327	5.93	Vacant										
Map 7 - 328	18.74	Vacant										
Map 7 - 329	2.67	Vacant										
Map 7 - 330	11.35	Vacant										
Map 7 - 331	19.69	Vacant										

Map 7 - 332	13.34	Vacant										
Map 7 - 333	6.45	Vacant										
Map 7 - 334	7.33	Vacant										
Map 7 - 335	0.15	Ineligible					X					
Map 7 - 336	5.66	Vacant										
Map 7 - 337	0.49	Ineligible					X					
Map 7 - 338	4.04	Vacant										
Map 7 - 339	3.98	Vacant										
Map 7 - 340	2.07	Underutilized										
Map 7 - 341	0.64	Unsuitable										X
Map 7 - 342	0.18	Unsuitable										X
Map 7 - 343	0.29	Unsuitable										X
Map 7 - 344	16.66	Unsuitable										X
Map 7 - 345	5.68	Ineligible					X					
Map 7 - 346	13.21	Ineligible					X					
Map 7 - 347	0.44	Unsuitable										X
Map 7 - 348	27.52	Ineligible					X					
Map 7 - 349	2.37	Unsuitable										X

Map 7 - 350	6.21	Ineligible				X						
Map 7 - 351	4.04	Ineligible				X						
Map 7 - 352	7.45	Ineligible				X						
Map 9 - 353	8.06	Vacant										
Map 9 - 354	34.77	Vacant										
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Map 9 - 356	15.93	Vacant										
Map 9 - 357	1.00	Ineligible				X						
Map 9 - 358	16.19	Vacant										
Map 9 - 359	0.36	Ineligible				X						
Map 9 - 360	8.26	Unsuitable										X
Map 9 - 361	1.21	Ineligible				X						
Map 9 - 362	0.64	Unsuitable										X
Map 9 - 363	2.34	Unsuitable										X
Map 9 - 364	1.30	Unsuitable										X
Map 9 - 365	0.03	Ineligible				X						
Map 9 - 366	3.92	Unsuitable										X
Map 9 - 367	0.33	Ineligible				X						

Map 9 - 368	0.05	Unsuitable											X
Map 9 - 369	0.18	Ineligible				X							
Map 9 - 370	7.73	Ineligible							X				
Map 9 - 371	1.21	Ineligible				X							
Map 9 - 372	2.13	Ineligible							X				
Map 9 - 373	2.73	Ineligible							X				
Map 9 - 374	1.35	Ineligible							X				
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Map 9 - 376	0.13	Ineligible				X							
Map 9 - 377	10.40	Vacant											
Map 9 - 378	3.29	Ineligible				X							
Map 9 - 379	0.10	Ineligible			X								
Map 9 - 380	1.98	Ineligible				X							
Map 9 - 381	0.05	Ineligible			X								
Map 9 - 382	0.68	Vacant											
Map 9 - 383	11.41	Vacant											
Map 9 - 384	3.42	Ineligible					X						
Map 9 - 385	0.52	Ineligible					X						

Map 9 - 386	8.33	Vacant									
Map 9 - 387	0.53	Ineligible				X					
Map 9 - 388	0.48	Vacant									
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Map 9 - 390	0.30	Ineligible				X					
Map 9 - 391	3.19	Ineligible	X								
Map 9 - 392	0.74	Ineligible				X					
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Map 9 - 395	0.74	Underutilized									
Map 9 - 396	2.00	Underutilized									
Map 9 - 397	0.35	Underutilized									
Map 9 - 398	0.22	Underutilized									
Map 9 - 399	0.26	Underutilized									
Map 9 - 400	1.97	Underutilized									
Map 9 - 401	1.91	Underutilized									
Map 9 - 402	2.76	Underutilized									
Map 9 - 403	0.76	Underutilized									

Map 9 - 404	0.38	Underutilized										
Map 9 - 405	0.20	Underutilized										
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Map 9 - 408	0.35	Ineligible					X					
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Map 9 - 410	4.28	Vacant										
Map 9 - 411	0.22	Ineligible					X					
Map 9 - 412	0.71	Ineligible					X					
Map 9 - 413	0.05	Ineligible						X				
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Map 9 - 415	3.30	Underutilized										
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Map 9 - 417	7.07	Vacant										
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Map 9 - 419	0.26	Vacant										
Map 9 - 420	0.04	Ineligible					X					
Map 9 - 421	15.46	Vacant										

Map 9 - 422	1.88	Ineligible				X					
Map 9 - 423	2.38	Vacant									
Map 9 - 424	0.36	Ineligible	X								
Map 9 - 425	2.99	Vacant									
Map 9 - 426	0.06	Ineligible	X								
Map 9 - 427	3.70	Vacant									
Map 9 - 428	0.21	Ineligible	X								
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Map 9 - 430	0.12	Underutilized									
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Map 9 - 432	0.33	Underutilized									
Map 9 - 433	0.49	Underutilized									
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Map 9 - 441	2.46	Underutilized											
Map 9 - 442	1.65	Underutilized											
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Map 10 - 456	0.59	Underutilized											
Map 10 - 457	0.71	Underutilized											

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Map 10 - 467	21.09	Ineligible					X						
Map 10 - 468	11.61	Ineligible					X						
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Map 10 - 475	1.56	Ineligible					X						

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Map 10 - 477	0.15	Ineligible					X					
Map 10 - 478	0.02	Ineligible				X						
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Map 9 - 487	0.46	Underutilized										
Map 9 - 488	4.86	Underutilized										
Map 9 - 489	0.26	Underutilized										
Map 9 - 490	0.19	Underutilized										
Map 9 - 491	0.13	Underutilized										
Map 9 - 492	0.26	Underutilized										
Map 10 - 493	0.09	Underutilized										

Map 10 - 494	0.03	Underutilized											
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Map 10 - 505	1.05	Ineligible					X						
Map 10 - 506	4.56	Ineligible				X							
Map 10 - 507	2.39	Ineligible					X						
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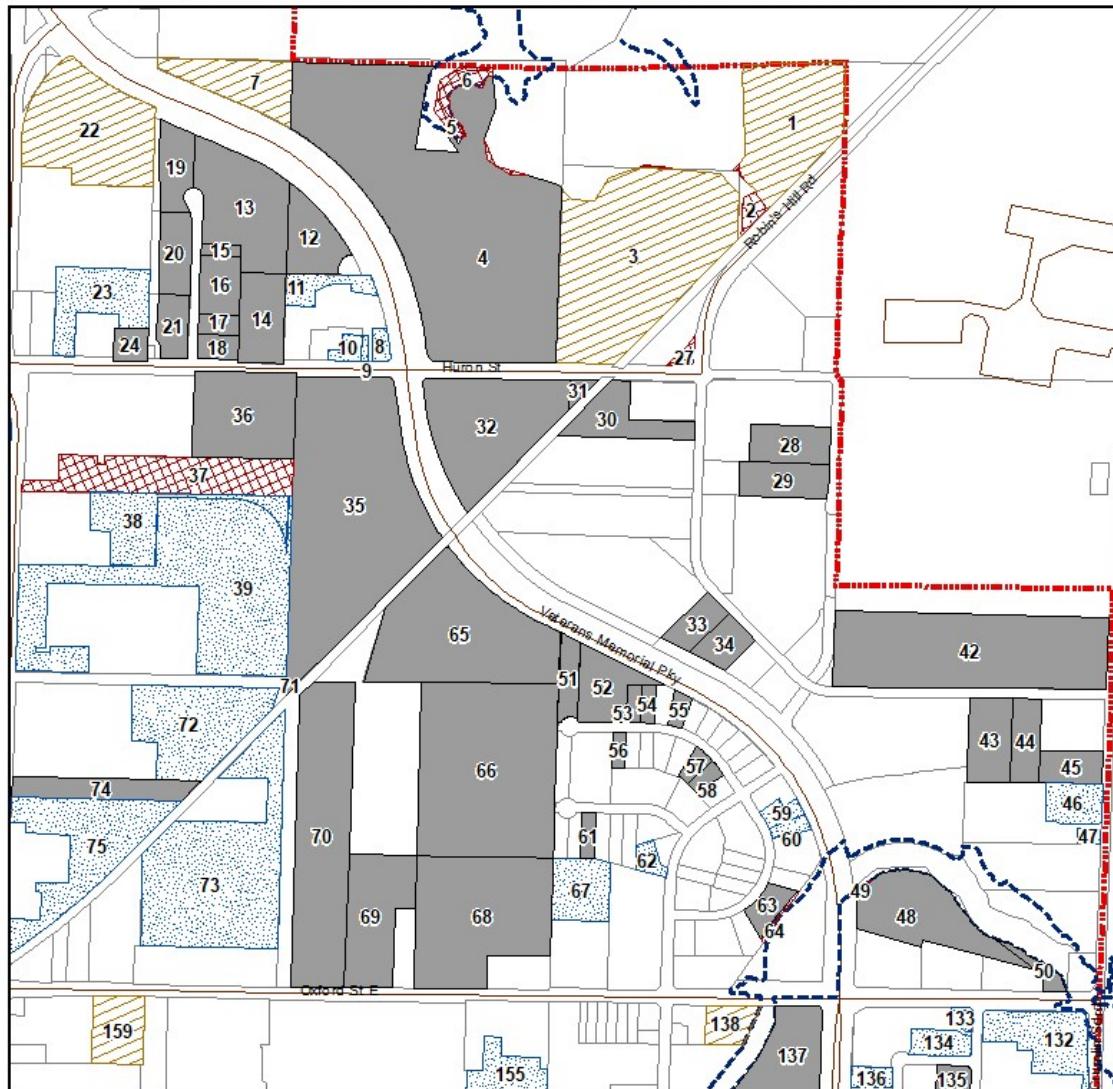
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Map 11 - 517	2.15	Unsuitable										X	
Map 11 - 518	0.45	Underutilized											
Map 11 - 519	0.35	Underutilized											
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Map 11 - 521	0.06	Ineligible								X			
Map 11 - 522	0.60	Ineligible								X			
Map 11 - 523	0.89	Ineligible								X			
Map 11 - 524	1.32	Ineligible								X			
Map 11 - 525	0.07	Ineligible	X										
Map 11 - 526	0.69	Ineligible								X			
Map 11 - 527	1.78	Ineligible								X			
Map 11 - 528	0.42	Ineligible	X										
Map 11 - 529	1.08	Ineligible								X			

Map 11 - 530	1.12	Ineligible	X									
Map 11 - 531	0.08	Ineligible	X									
Map 11 - 532	0.39	Ineligible					X					
Map 11 - 533	0.13	Ineligible	X									
Map 11 - 534	0.02	Ineligible	X									
Map 11 - 535	1.03	Ineligible					X					
Map 11 - 536	0.53	Ineligible					X					
Map 11 - 537	1.95	Ineligible					X					
Map 11 - 538	2.57	Ineligible					X					
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Map 11 - 540	0.04	Underutilized										
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Map 11 - 542	0.51	Underutilized										
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Map 11 - 545	0.34	Unsuitable									X	
Map 11 - 546	0.54	Underutilized										
Map 11 - 547	0.23	Unsuitable									X	

Map 11 - 548	0.06	Ineligible				X						
Map 11 - 549	1.00	Unsuitable									X	
Map 11 - 550	0.25	Ineligible				X						
Map 11 - 551	0.15	Underutilized										
Map 11 - 552	1.33	Underutilized										
Map 11 - 553	3.48	Unsuitable									X	
Map 11 - 554	0.53	Ineligible				X						
Map 11 - 555	0.66	Unsuitable									X	
Map 11 - 556	0.69	Unsuitable									X	
Map 11 - 557	0.26	Unsuitable									X	
Map 11 - 558	0.55	Unsuitable									X	
Map 11 - 559	2.98	Underutilized										
Map 11 - 560	3.07	Ineligible				X						
Map 11 - 561	0.07	Ineligible				X						

5 APPENDIX B – VLI Supply Maps

City of London Industrial Vacant Land Inventory

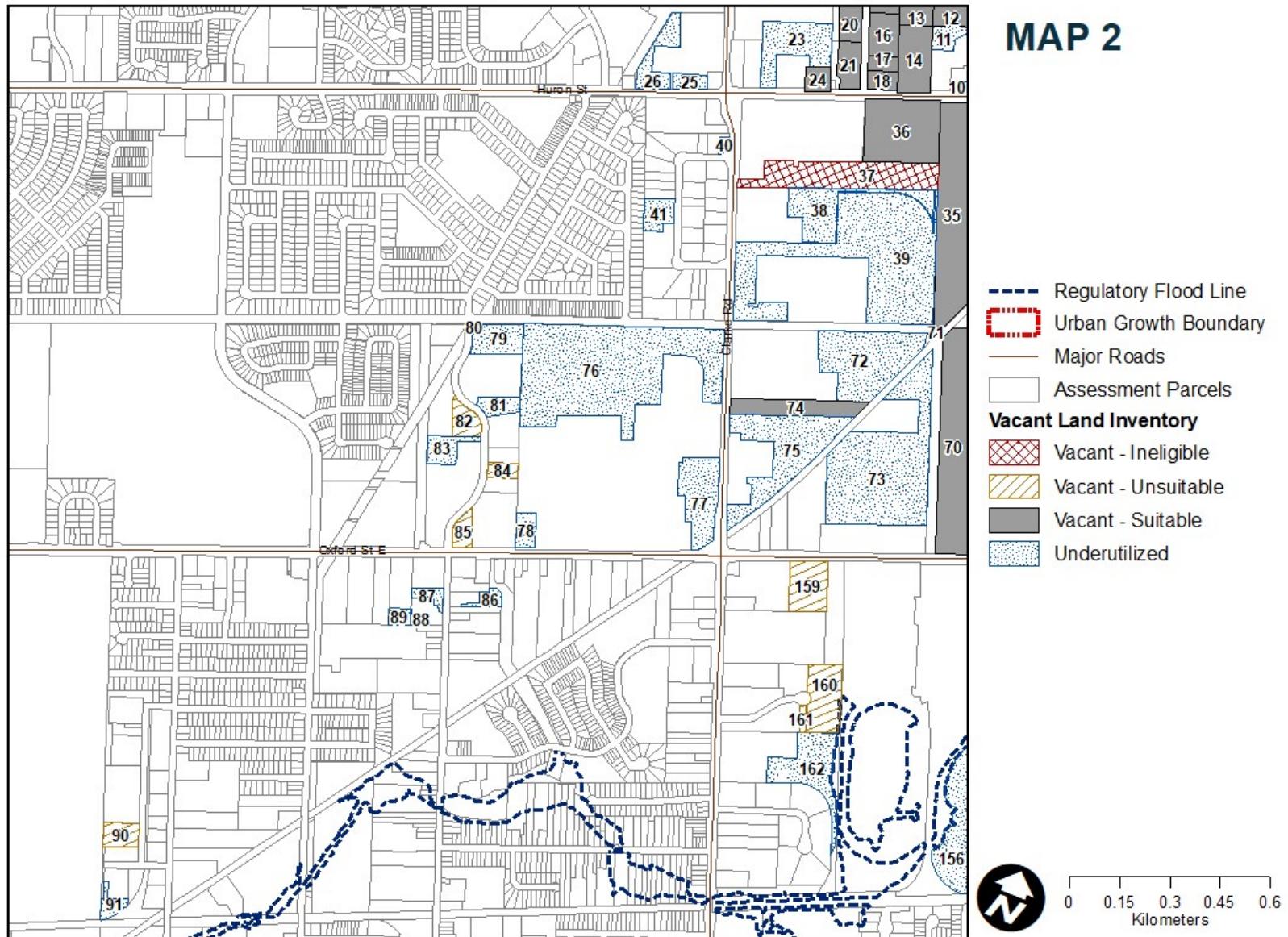


MAP 1

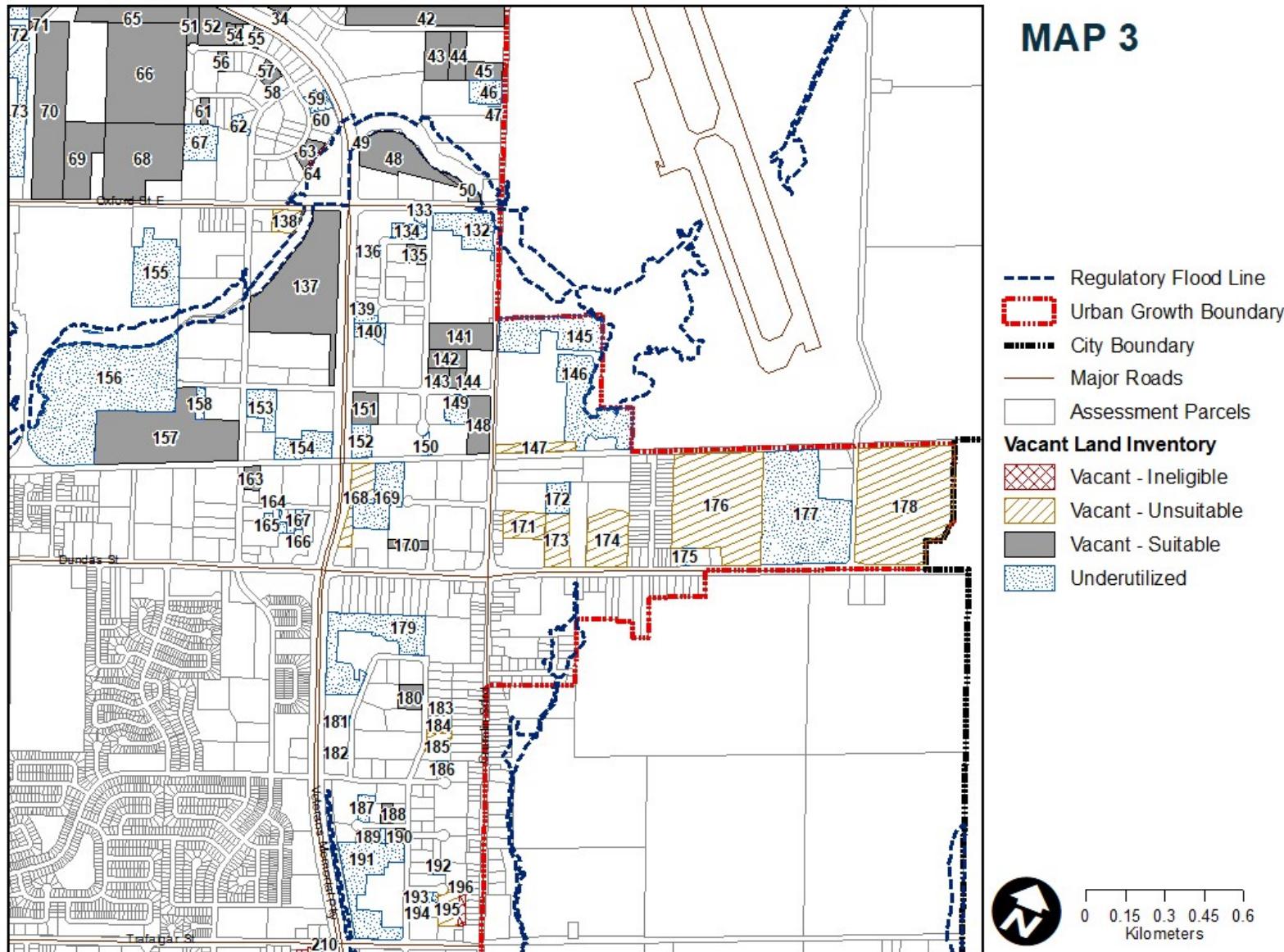
- Regulatory Flood Line
- Urban Growth Boundary
- Major Roads
- Assessment Parcels
- Vacant Land Inventory**
- Vacant - Ineligible
- Vacant - Unsuitable
- Vacant - Suitable
- Underutilized

0 0.1 0.2 0.3 0.4
Kilometers

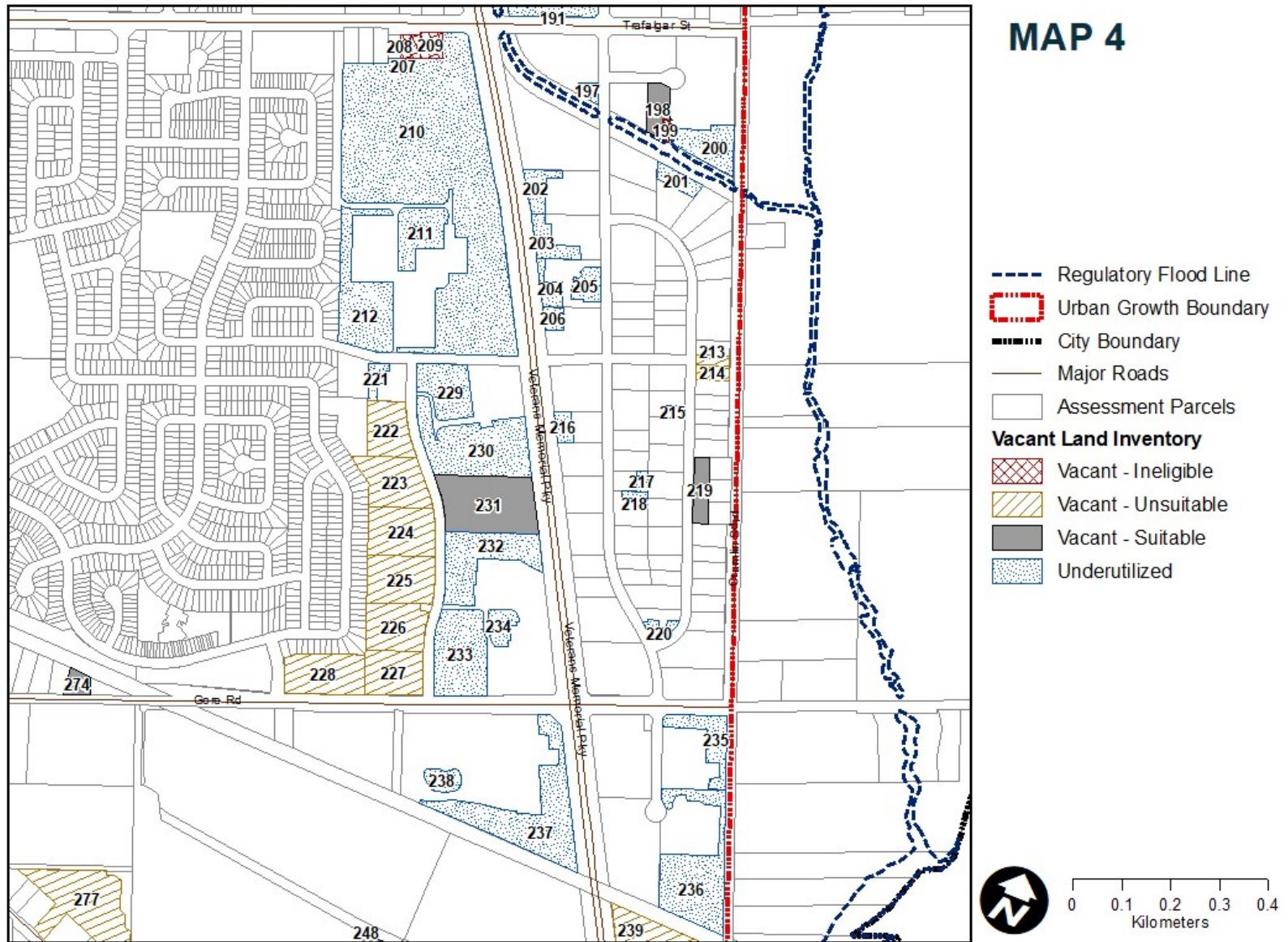
City of London Industrial Vacant Land Inventory



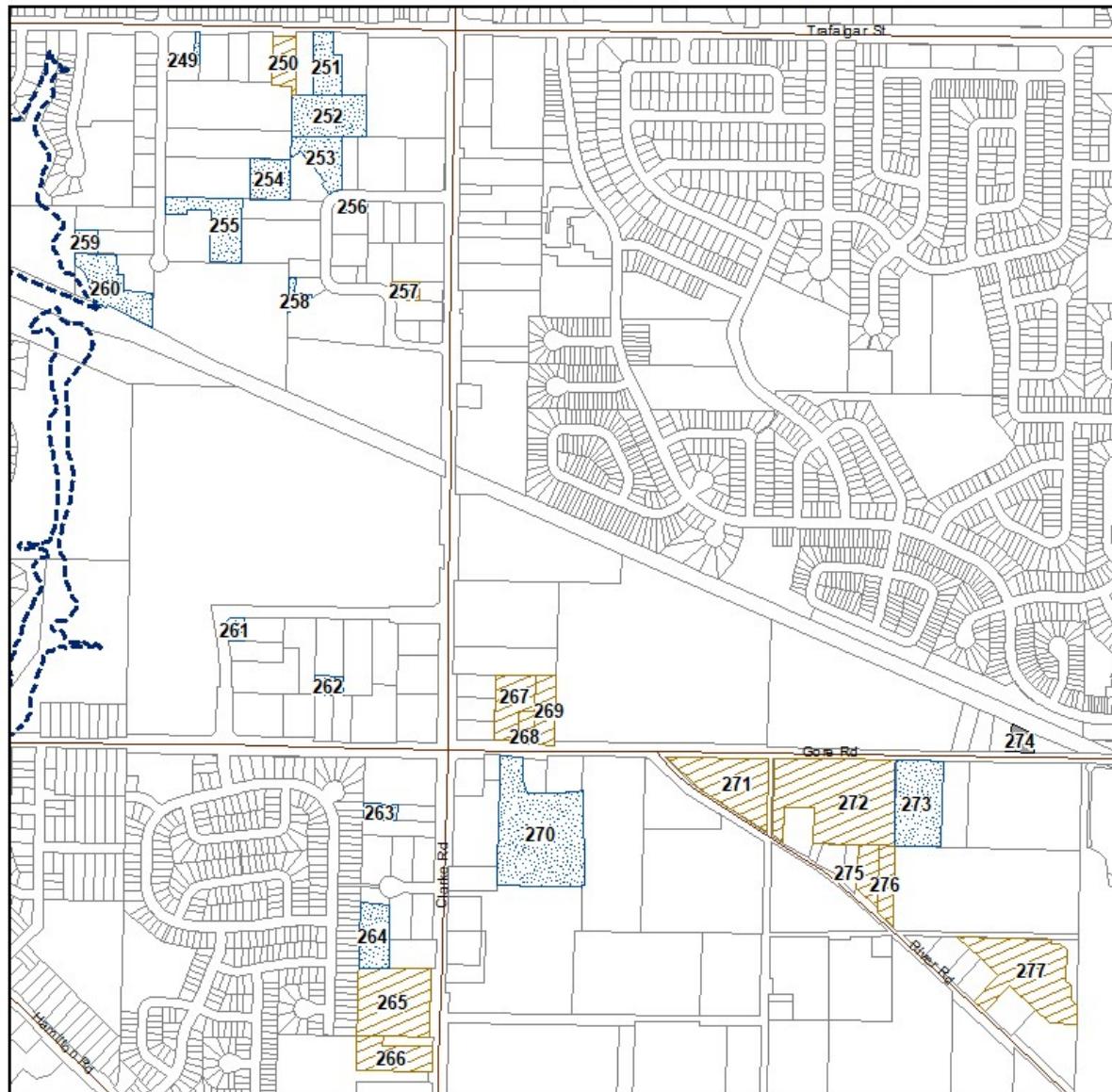
City of London Industrial Vacant Land Inventory



City of London Industrial Vacant Land Inventory

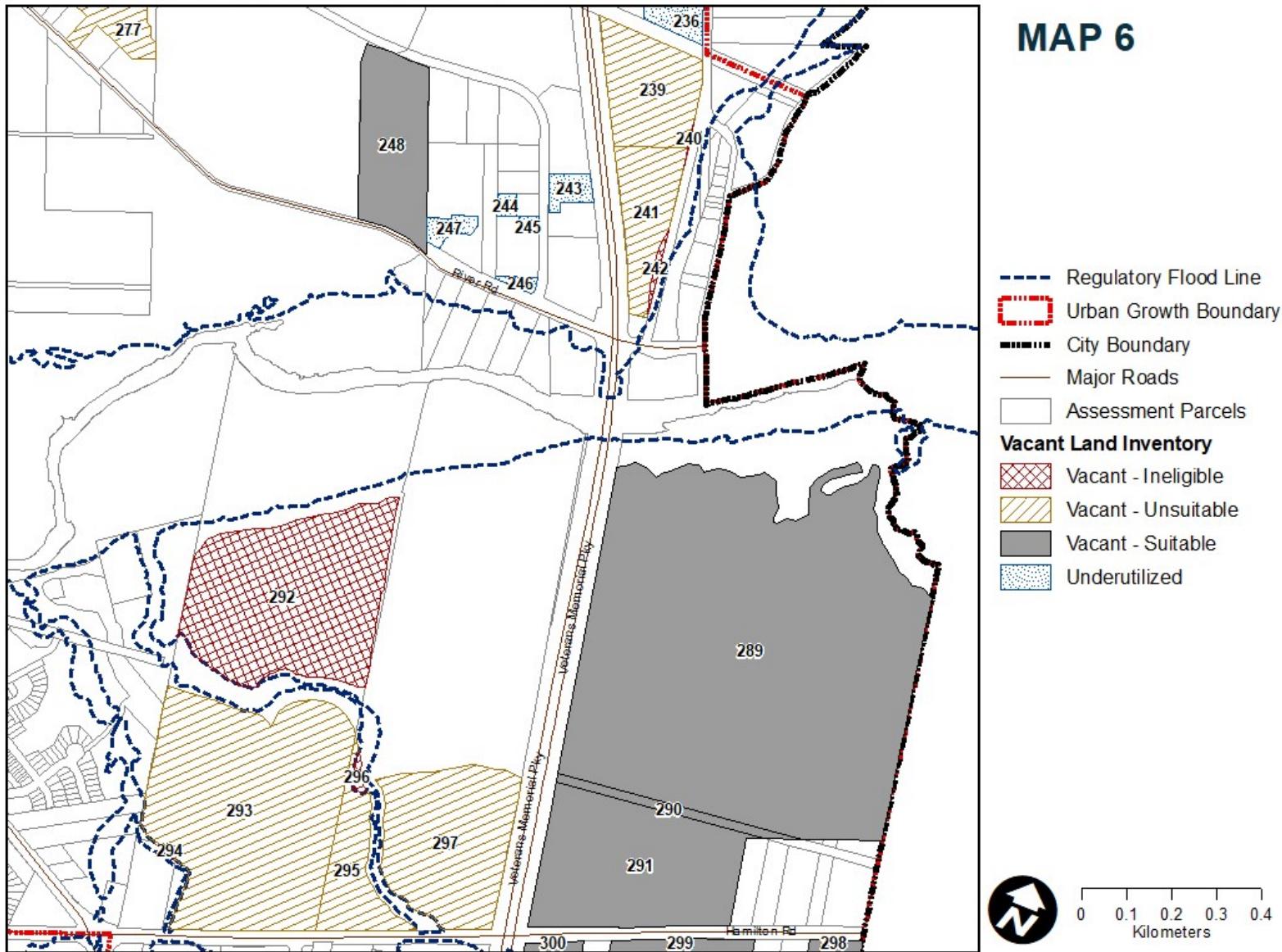


City of London Industrial Vacant Land Inventory

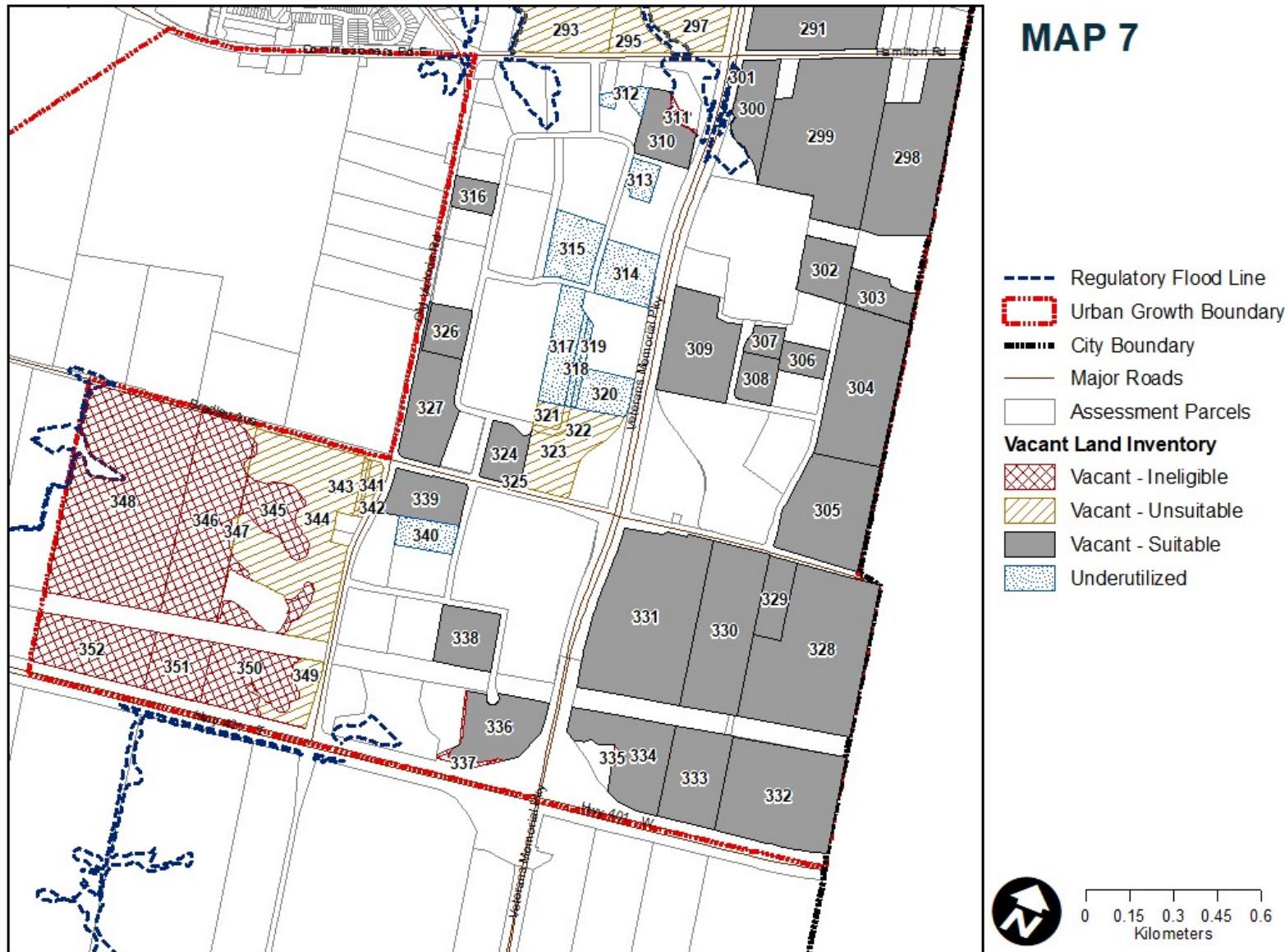


MAP 5

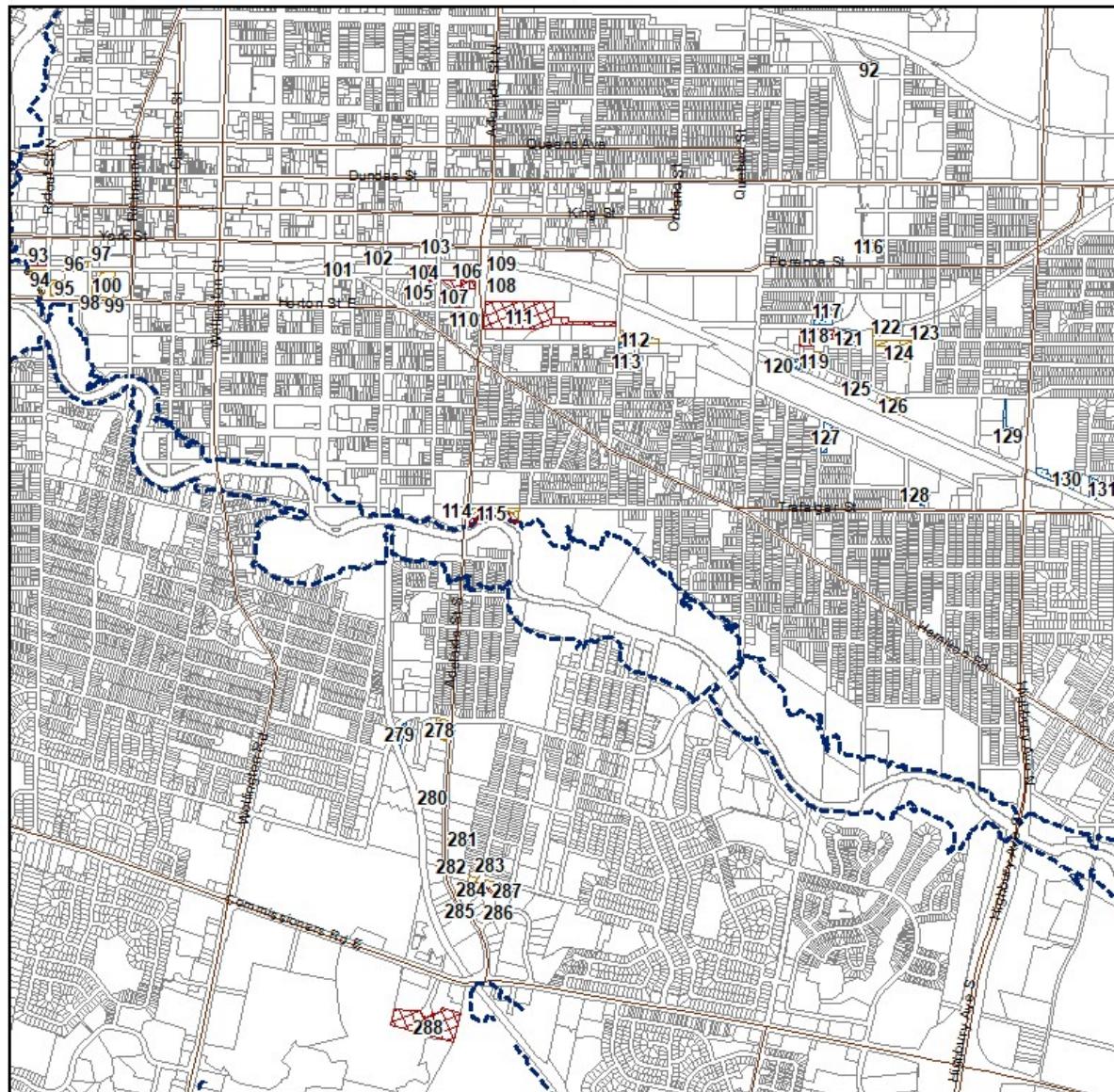
City of London Industrial Vacant Land Inventory



City of London Industrial Vacant Land Inventory



City of London Industrial Vacant Land Inventory

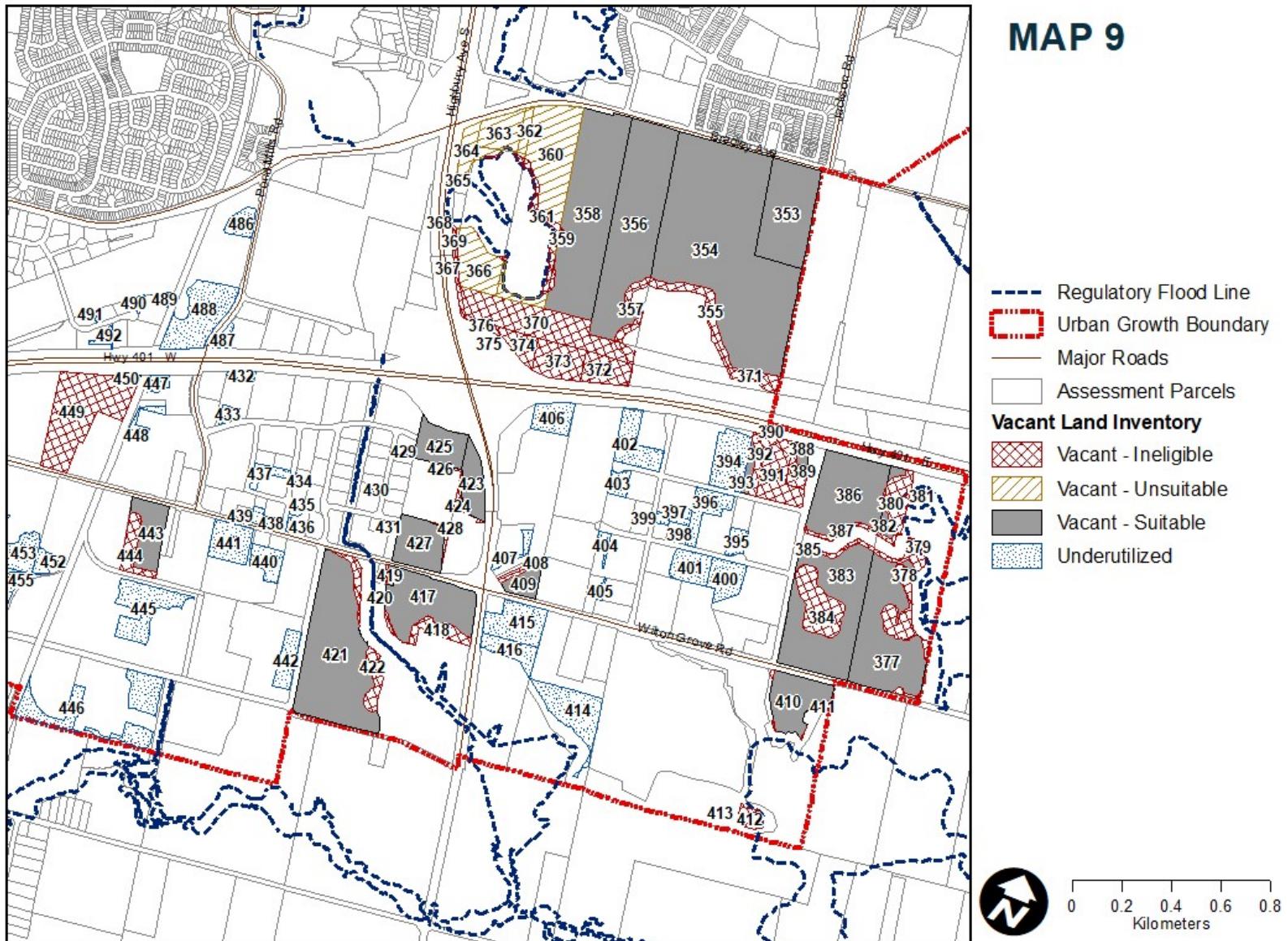


MAP 8

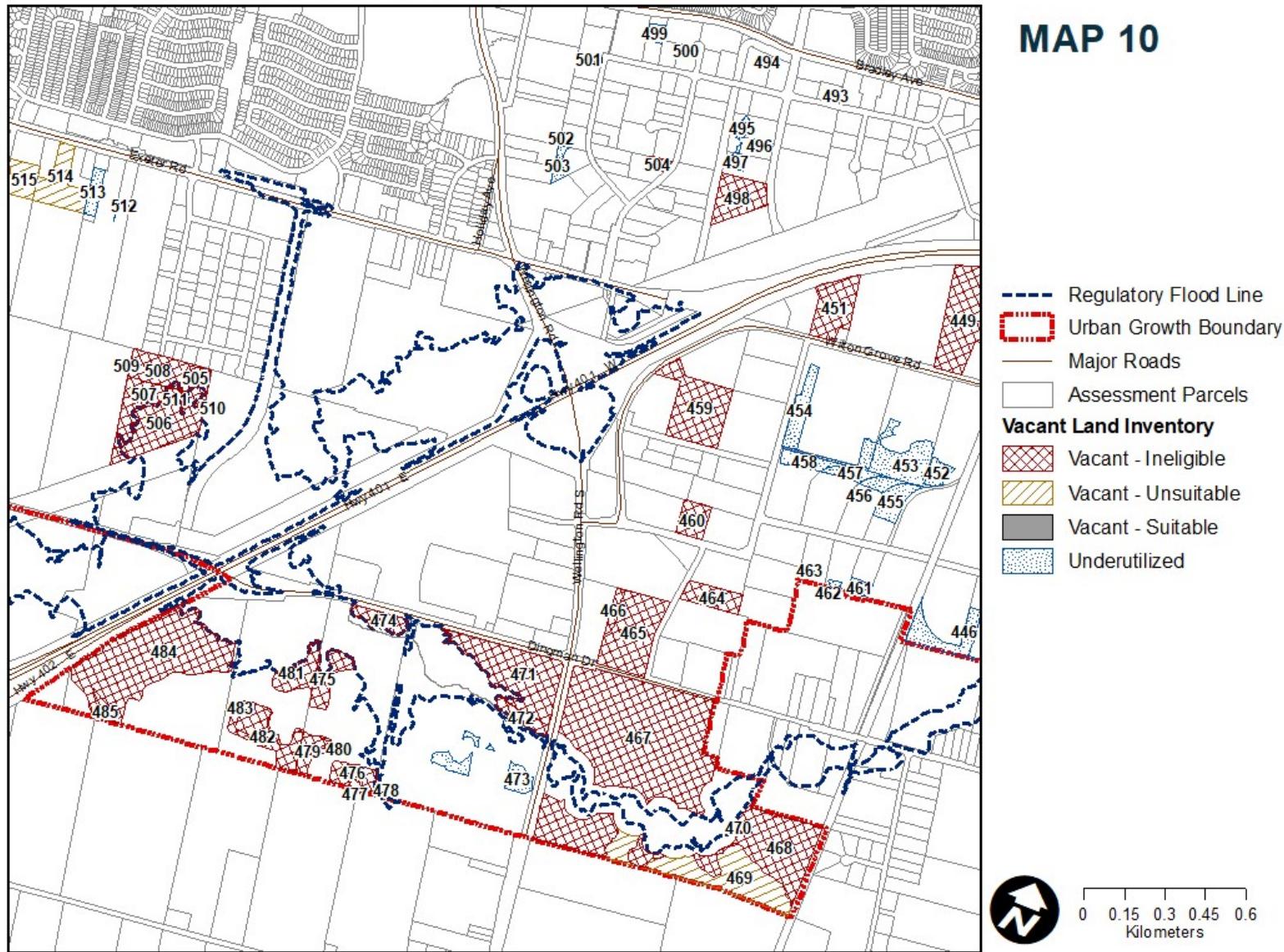


0 0.25 0.5 0.75 1
Kilometers

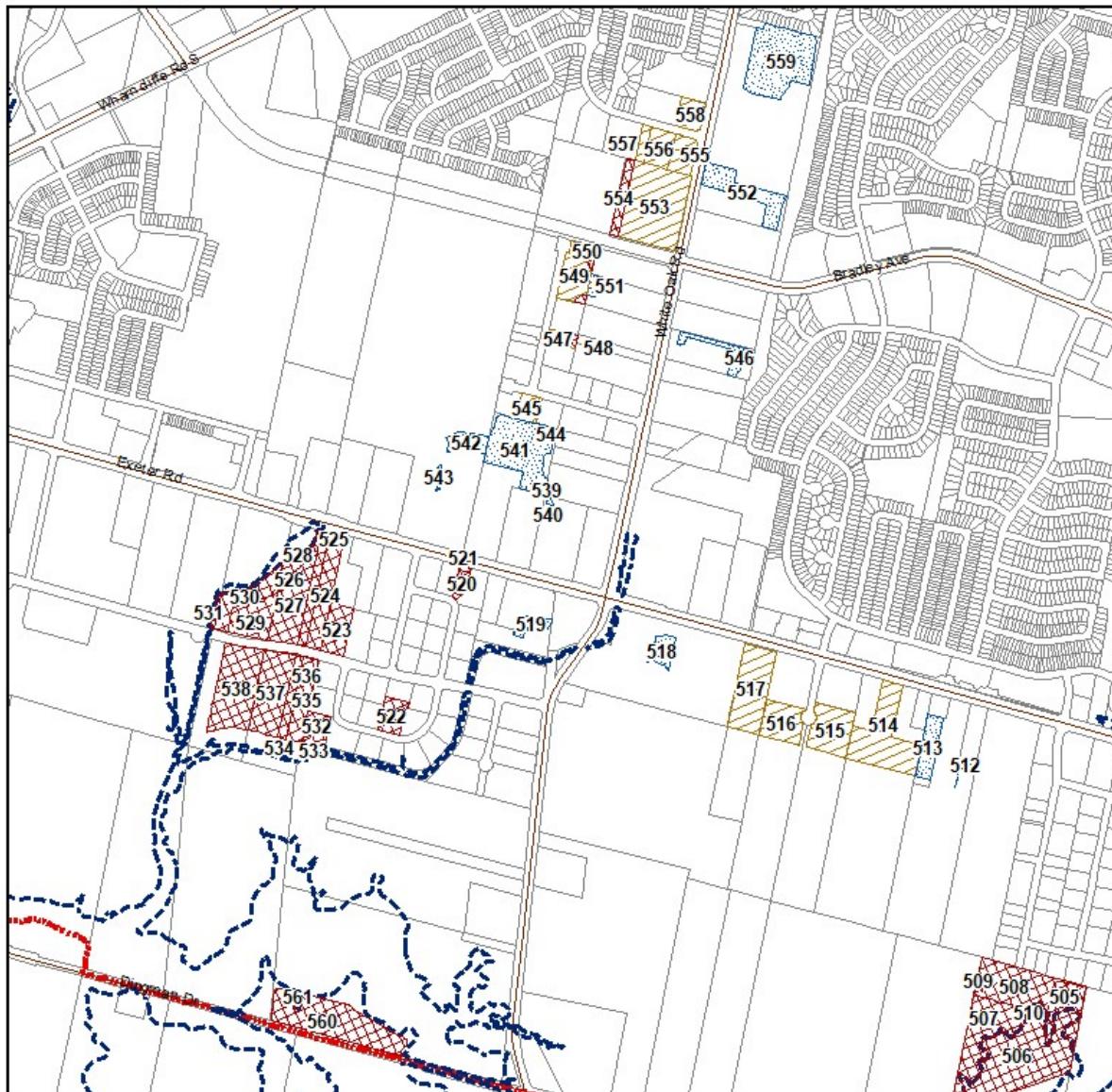
City of London Industrial Vacant Land Inventory



City of London Industrial Vacant Land Inventory



City of London Industrial Vacant Land Inventory



MAP 11



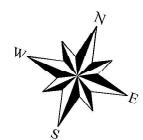
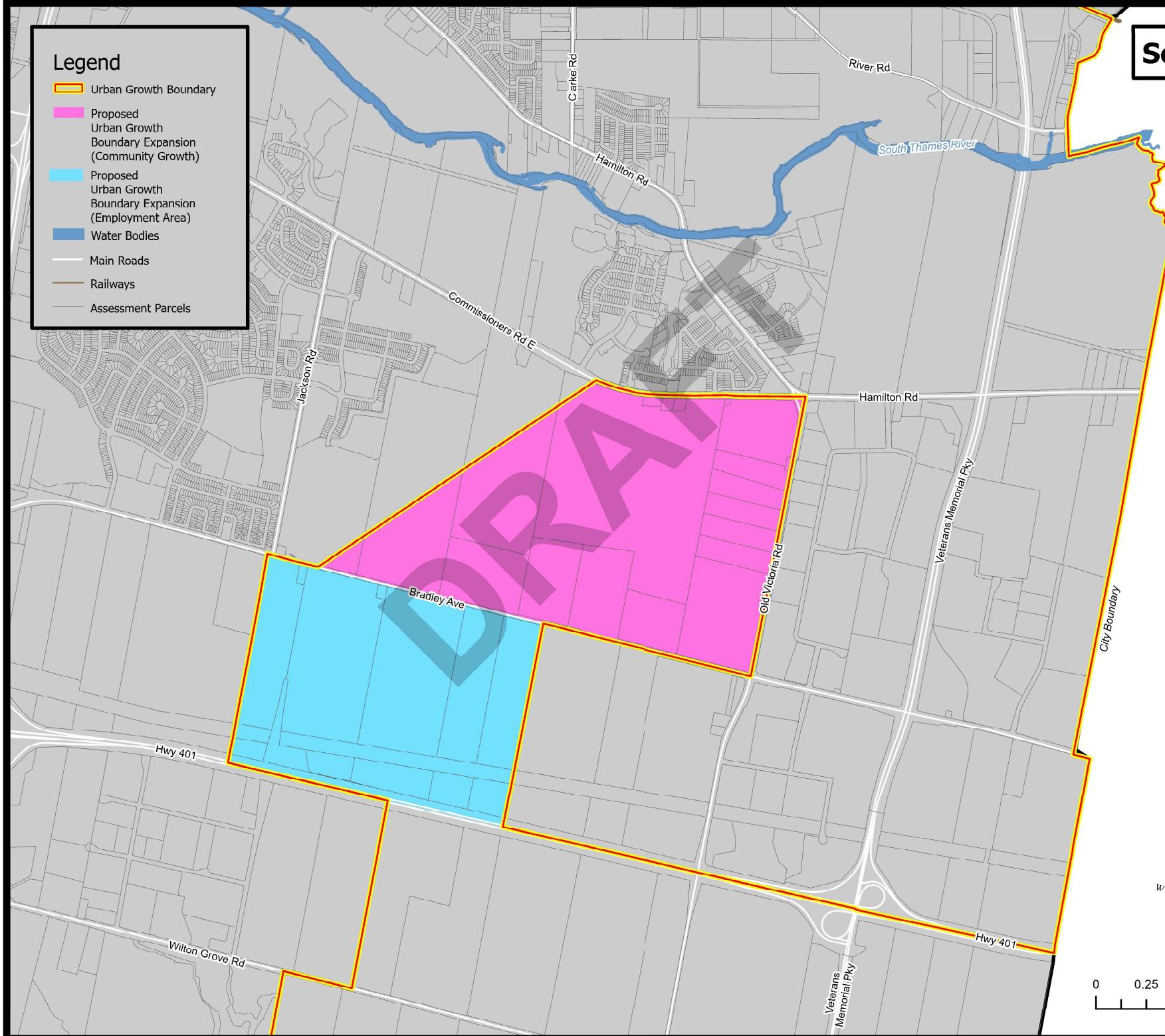
0 0.15 0.3 0.45 0.6
Kilometers

Appendix B – Draft Urban Growth Boundary Review (Employment Areas)

Southeast

Legend

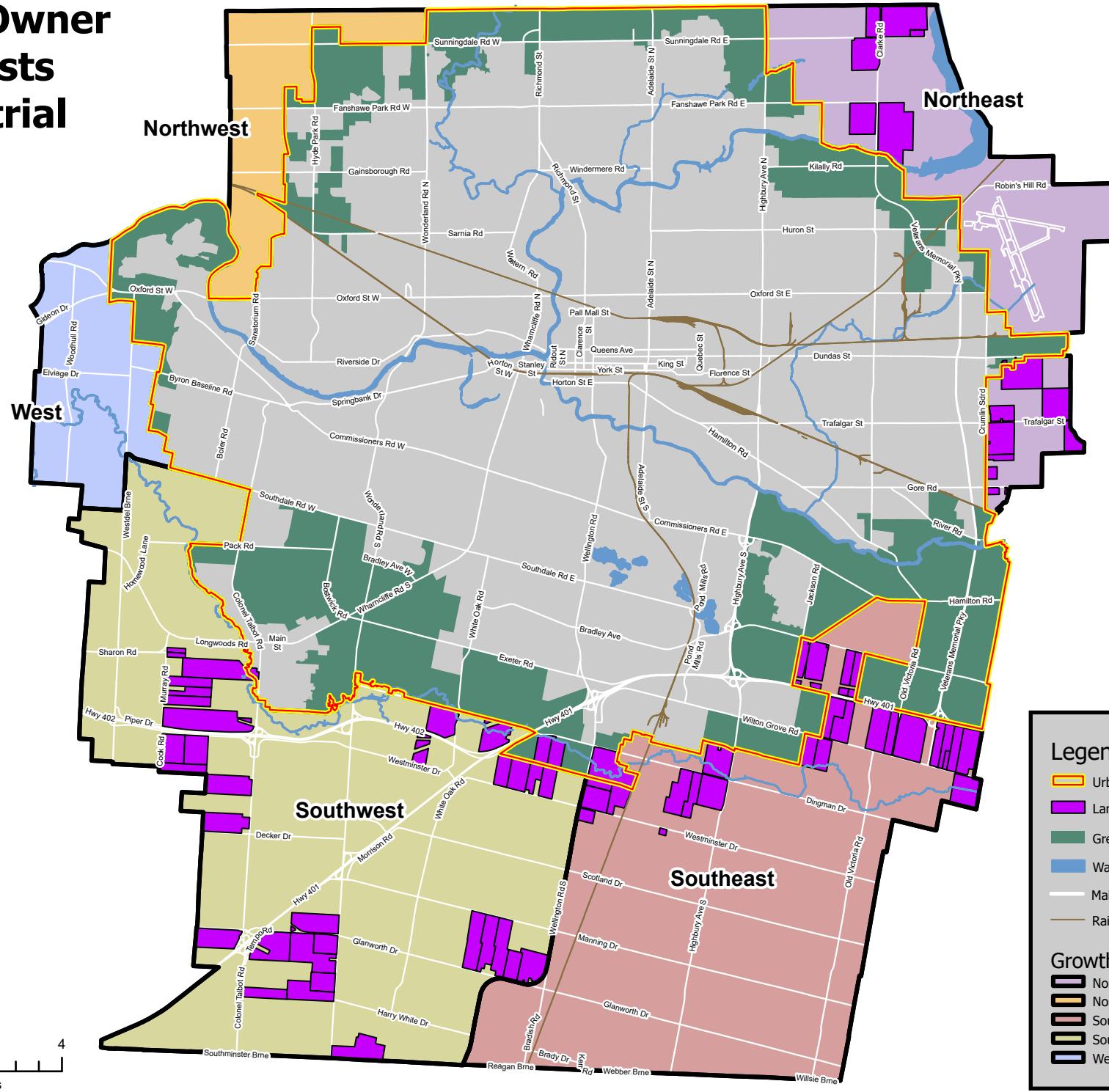
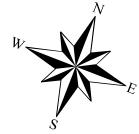
- Urban Growth Boundary
- Proposed Urban Growth Boundary Expansion (Community Growth)
- Proposed Urban Growth Boundary Expansion (Employment Area)
- Water Bodies
- Main Roads
- Railways
- Assessment Parcels



0 0.25 0.5 1
Kilometers

Appendix C – Landowner Request Evaluations for Employment Areas

Land Owner Requests Industrial



Legend

- Urban Growth Boundary
- Land Owner Requests
- Greenfield Areas
- Water Bodies
- Main Roads
- Railways

Growth Area Maps

- Northeast
- Northwest
- Southeast
- Southwest
- West

0 1 2 4
Kilometers

Community Growth

Criteria Number	Evaluation Criteria
1	Meets the Province's Minimum Distance Separation requirements (for separation between existing livestock operations and new sensitive land uses).
2	Logical extension of an existing neighbourhood and/or will be large enough area to accommodate a complete new neighbourhood (Future Community Growth) through phased progression of urban development.
3	Addressing the need to designate and plan for land to accommodate an appropriate range and mix of land uses.
4	Parcel shapes, size, configuration, topography, and potential for planned urban uses.
5	Existing and planned infrastructure will be optimized: a logical integration with master servicing strategies.
6	Logical and financial viability of servicing new parcels or areas.
7	Impact on agricultural operations will be minimized, including directing expansions to lower classes of prime agricultural land categories to the extent possible, or mitigation where avoidance is not possible.
8	Protection of components of the Natural Heritage System and built heritage.

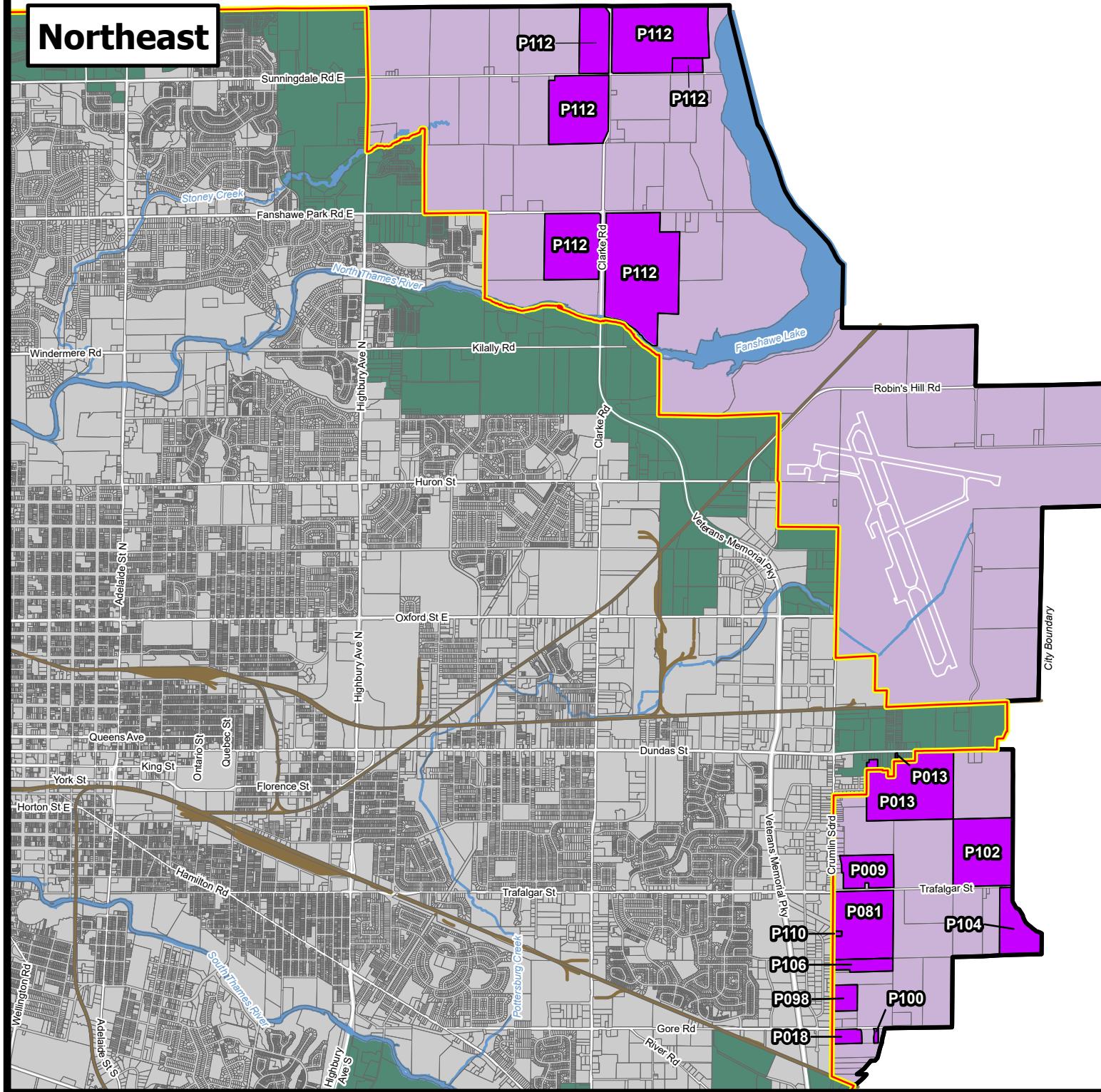
- Criteria not met
- Criteria conditionally met
- Criteria met

Employment Areas

Criteria Number	Evaluation Criteria
1	Meets the Province's Minimum Distance Separation requirements (for separation between existing livestock operations and new sensitive land uses).
2	Logical extension of an existing neighbourhood and/or will be large enough area to accommodate a complete new neighbourhood (Future Industrial Growth) through phased progression of urban development.
3	Addressing the need to designate and plan for land to accommodate an appropriate range and mix of land uses.
4	Parcel shapes, size, configuration, topography, and potential for planned urban uses.
5	Existing and planned infrastructure will be optimized: a logical integration with master servicing strategies.
6	Logical and financial viability of servicing new parcels or areas.
7	Impact on agricultural operations will be minimized, including directing expansions to lower classes of prime agricultural land categories to the extent possible, or mitigation where avoidance is not possible.
8	Protection of components of the Natural Heritage System and built heritage.
9	Alignment with economic development objectives and priorities.

- Criteria not met
- Criteria conditionally met
- Criteria met

Northeast

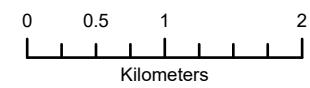
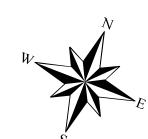


Legend

- Urban Growth Boundary
- Land Owner Requests
- Greenfield Areas
- Water Bodies
- Main Roads
- Railways
- Assessment Parcels

Growth Area Maps

- Northeast
- Northwest
- Southeast
- Southwest
- West



Employment Areas

Parcel ID	Address / Location	Criteria 1	Criteria 2	Criteria 3	Criteria 4	Criteria 5	Criteria 6	Criteria 7	Criteria 8	Criteria 9
P009	2700 Trafalgar Rd	●	○	●	●	○	○	○	○	○
P013	2613 & 2679 Dundas St	●	●	○	●	○	○	○	○	○
P018	360 Crumlin Sdrd	●	○	○	●	○	○	○	●	○
P081	764, 772, 774 Crumlin Sdrd	○	○	○	○	○	○	○	○	○
P098	488 Crumlin Sdrd	●	●	○	●	○	○	○	●	○
P100	3345 Gore Road	●	○	○	○	○	○	○	●	○
P102	3050 Trafalgar St	●	○	○	●	○	○	○	○	○
P104	3085 Trafalgar St	●	○	○	●	○	○	○	○	○
P106	610 Crumlin Sdrd	●	●	○	○	○	○	●	●	○
P110	706 Crumlin Sdrd	○	○	○	●	○	○	●	●	○
P112	2538 & 2760 Sunningdale Rd E	●	○	○	○	○	○	●	●	○
P112	2400 Sunningdale Rd E	●	○	○	○	○	○	●	●	○
P112	2325 Sunningdale Rd E	●	○	○	○	○	○	●	●	○
P112	1788 Clarke Rd	●	○	○	○	○	○	●	●	○
P112	1865 Clarke Rd	●	○	○	○	○	○	●	●	○

Community Growth

Parcel ID	Address / Location	Criteria 1	Criteria 2	Criteria 3	Criteria 4	Criteria 5	Criteria 6	Criteria 7	Criteria 8
P112	2538 & 2760 Sunningdale Rd E	●	○	○	○	○	○	●	●
P112	2400 Sunningdale Rd E	●	●	○	○	○	○	●	●
P112	2325 Sunningdale Rd E	○	●	○	○	○	○	●	●
P112	1788 Clarke Rd	●	○	○	○	○	○	●	●
P112	1865 Clarke Rd	●	●	●	○	○	○	●	●

Requests received after Community Growth submission deadline

○ Criteria not met

○ Criteria conditionally met

● Criteria met

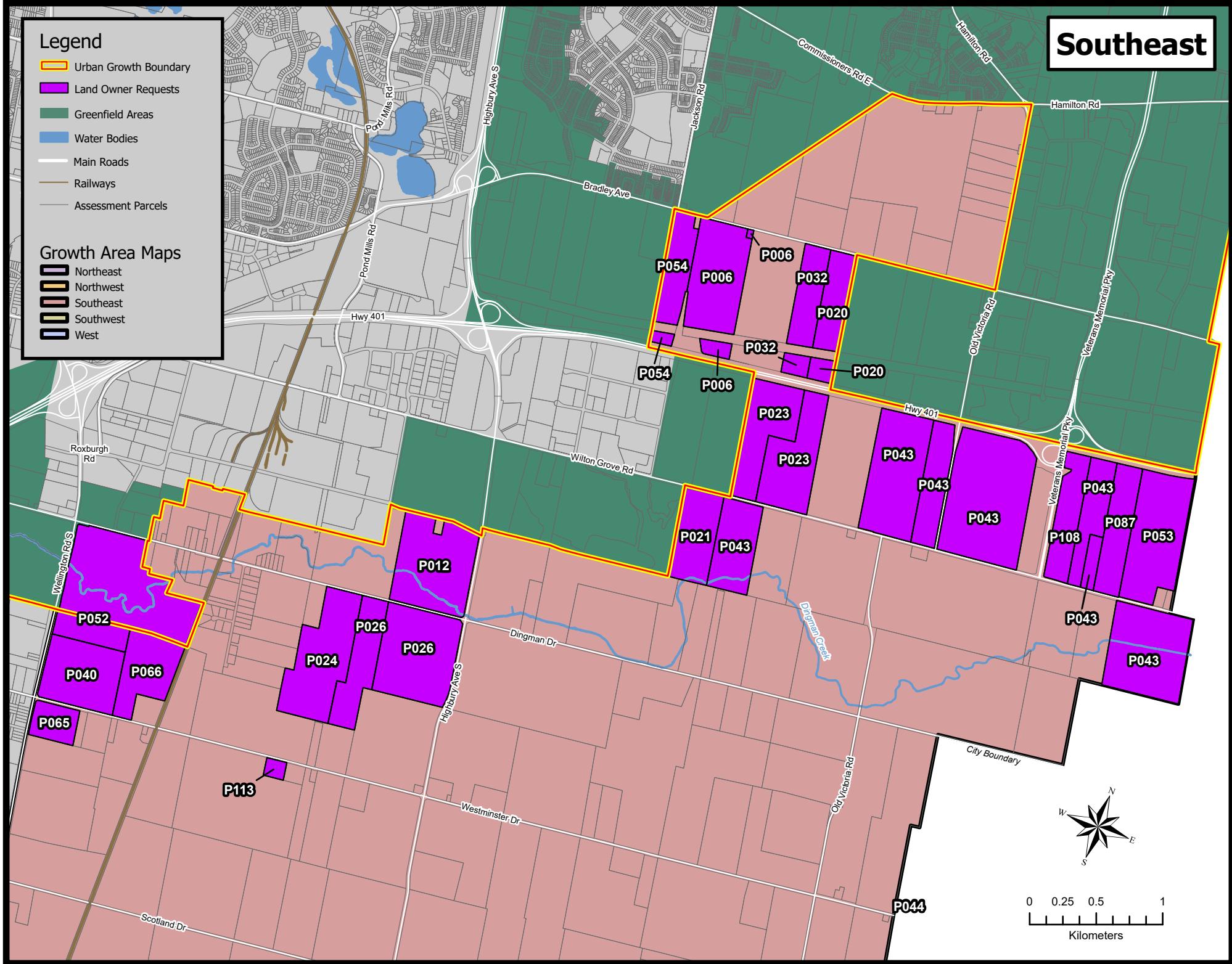
Southeast

Legend

- Urban Growth Boundary
- Land Owner Requests
- Greenfield Areas
- Water Bodies
- Main Roads
- Railways
- Assessment Parcels

Growth Area Maps

- Northeast
- Northwest
- Southeast
- Southwest
- West



Employment Areas

Parcel ID	Address / Location	Criteria 1	Criteria 2	Criteria 3	Criteria 4	Criteria 5	Criteria 6	Criteria 7	Criteria 8	Criteria 9
P006	1871 and 1913 Bradley Ave	●	●	●	●	●	●	●	●	●
P012	4423 Highbury Ave S	●	●	●	●	●	●	●	●	●
P020	2049-2055 Bradley Ave	●	●	●	●	●	●	●	●	●
P021	1741 Wilton Grove Rd	●	●	●	●	●	●	●	●	●
P023	1806 & 1874 Wilton Grove Rd	●	●	●	●	●	●	●	●	●
P024	2329 Dingman Dr	●	●	●	●	●	●	●	●	●
P026	2134-2145 Dingman Dr	●	●	●	●	●	●	●	●	●
P032	2017 Bradley Ave	●	●	●	●	●	●	●	●	●
P040	4866 Wellington Rd S	●	●	●	●	●	●	●	●	●
P043	3700 Old Victoria Rd	●	●	●	●	●	●	●	●	●
P043	2214 Wilton Grove Rd	●	●	●	●	●	●	●	●	●
P043	1811 Wilton Grove Rd	●	●	●	●	●	●	●	●	●
P043	2471 Wilton Grove Rd	●	●	●	●	●	●	●	●	●
P043	2034-2094 Wilton Grove Rd	●	●	●	●	●	●	●	●	●
P043	2338-2350 Wilton Grove Rd	●	●	●	●	●	●	●	●	●
P052	4680 Wellington Rd S	●	●	●	●	●	●	●	●	●
P053	2556 Wilton Grove Rd	●	●	●	●	●	●	●	●	●
P054	1803 Bradley Ave	●	●	●	●	●	●	●	●	●
P065	5044 Wellington Rd S	●	●	●	●	●	●	●	●	●
P066	2690 Westminster Dr	●	●	●	●	●	●	●	●	●
P087	2396 Wilton Grove Rd	●	●	●	●	●	●	●	●	●
P108	2316 Wilton Grove Road	●	●	●	●	●	●	●	●	●
P113	2359 Westminster Dr	●	●	●	●	●	●	●	●	●

Community Growth

Parcel ID	Address / Location	Criteria 1	Criteria 2	Criteria 3	Criteria 4	Criteria 5	Criteria 6	Criteria 7	Criteria 8
P113	2359 Westminster Dr	●	●	●	●	●	●	●	●

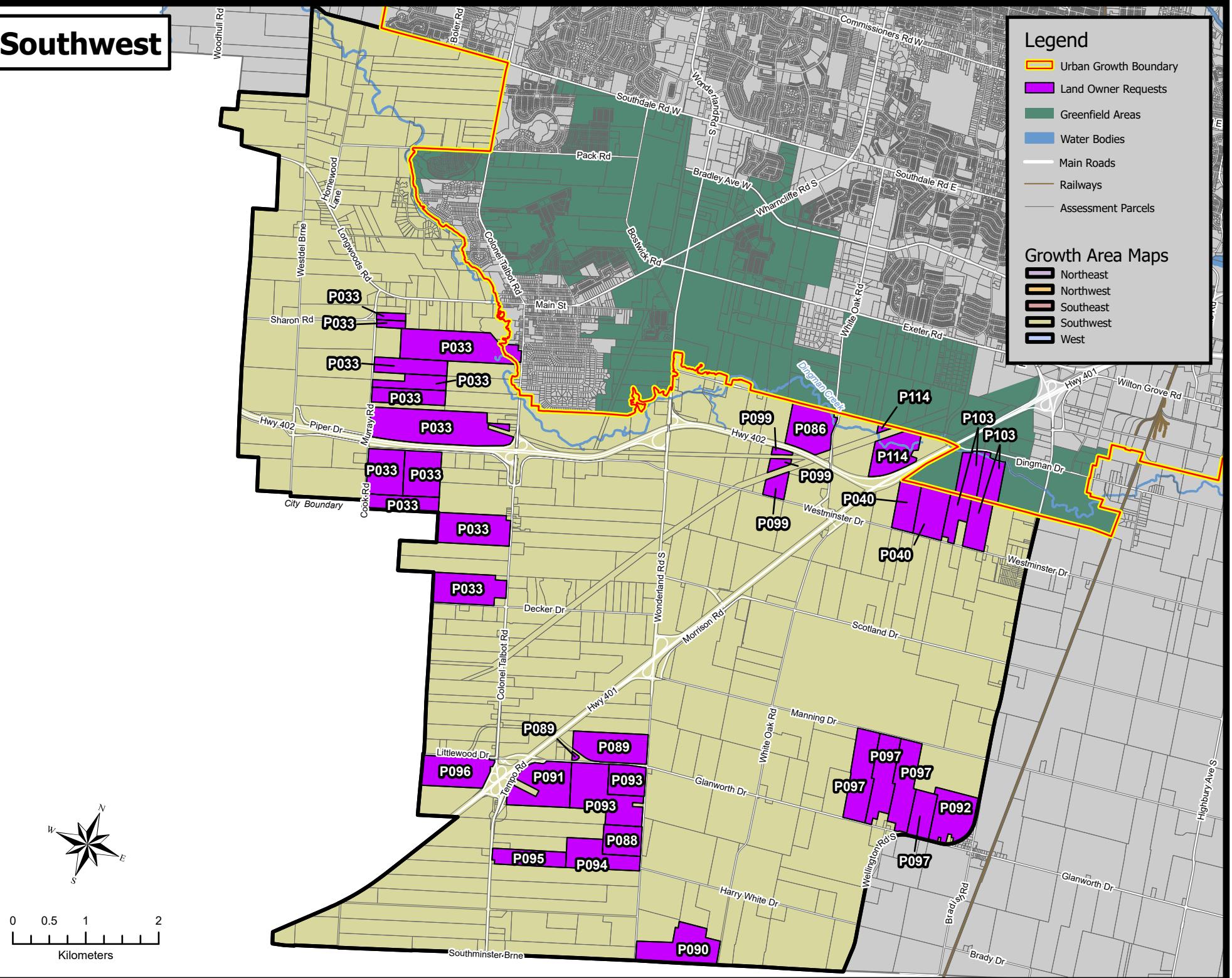
Request received after Community Growth submission deadline

○ Criteria not met

● Criteria conditionally met

● Criteria met

Southwest



Employment Areas

Parcel ID	Address / Location	Criteria 1	Criteria 2	Criteria 3	Criteria 4	Criteria 5	Criteria 6	Criteria 7	Criteria 8	Criteria 9
P033	4380 Murray Rd	●	○	○	○	○	○	●	●	○
P033	4410 Murray Rd	○	○	○	○	○	○	●	●	○
P033	4519-4557 Colonel Talbot Rd	●	○	○	○	●	●	●	●	○
P033	4638 Murray Rd	○	○	○	○	○	○	●	●	○
P033	4740 Murray Rd	●	○	○	○	○	○	●	●	○
P033	5619 Colonel Talbot Rd	●	○	○	○	○	○	●	●	○
P033	4798 Murray Rd	○	○	○	○	○	○	●	●	○
P033	4956 Murray Rd	○	○	○	○	○	○	●	●	○
P033	7673 Westminster Dr	○	○	○	○	○	○	●	●	○
P033	7541, 7527 Westminster Dr	○	○	○	○	○	○	●	●	○
P033	5246 Cook Rd	●	○	○	○	○	○	●	●	○
P033	5315 Colonel Talbot Rd	●	○	○	○	○	○	●	●	○
P040	3618 Westminster Dr	●	●	●	●	○	○	●	●	○
P040	3386 Westminster Dr	●	●	●	●	○	○	●	●	○
P086	4563 White Oak Rd	●	○	○	○	○	●	●	●	○
P088	6831 Wonderland Rd S	●	○	○	○	○	○	●	●	○
P089	6304 Glanworth Drive	○	○	○	○	○	○	●	●	○
P090	4040 Southminster Bourne	●	○	○	○	○	○	●	●	○
P091	6333 Glanworth Dr	●	○	○	○	○	○	●	●	○
P092	6421 Wellington Rd South	●	○	○	○	●	○	●	●	○
P093	6567 Wonderland Rd South	●	○	○	○	○	○	●	●	○
P093	6249 Glanworth Dr	●	○	○	○	○	○	●	●	○
P094	6929 Wonderland Rd South	●	○	○	○	○	○	●	●	○
P095	6926 Colonel Talbot Rd	●	○	○	○	○	○	●	●	○
P096	7031 Littlewoods Drive	●	○	○	○	○	○	●	●	○
P097	6597 Wellington Rd	○	○	○	○	○	○	●	●	○
P097	6601 Wellington Rd	○	○	○	○	○	○	●	●	○
P097	3540 Glanworth Dr	●	○	○	○	○	○	●	●	○
P097	3476 Glanworth Dr	●	○	○	○	○	○	●	●	○
P099	4236 Westminister Drive	○	○	○	○	○	○	●	●	○
P103	3226 Westminster Drive	●	●	●	●	●	●	●	●	○
P103	3356 Westminster Drive	●	●	●	●	●	●	●	●	○
P114	3699 Dingman Drive	○	○	○	○	●	●	●	●	○

Community Growth

Parcel ID	Address / Location	Criteria 1	Criteria 2	Criteria 3	Criteria 4	Criteria 5	Criteria 6	Criteria 7	Criteria 8
P114	3699 Dingman Drive	○	○	○	○	○	●	●	●

Request received after Community Growth submission deadline

○ Criteria not met

● Criteria conditionally met

● Criteria met

Appendix D – Draft Text Amendments for Privately Initiated UGB Expansion Applications (with Track Changes)

Policy	Proposed Changes (Delete, Add)	Rationale/summary of changes
1. 78_	<p><u>Privately Initiated Applications for expansion of the Urban Growth Boundary Expansion Applications</u> between comprehensive official plan review periods, may be supported only where there is a demonstrated need and public benefit and all other policies of this Plan relating to urban growth boundary expansion are met.</p> <p><u>The application shall be reviewed in accordance with the Our Tools Chapter. In addition to the criteria provided in Policy 76, the following criterion shall apply:</u></p> <ul style="list-style-type: none"> • <u>The boundary expansion is required in order to meet projected growth over the planning horizon and meet provincial requirements for the minimum land required to accommodate future community growth and future industrial growth;</u> 	<p>Revised to specify when Privately Initiated Urban Growth Boundary Expansion Applications can be submitted and identifies specific criteria and requirements that shall be considered for Privately Initiated Urban Growth Boundary Expansion Applications.</p>
2. 1580_	<p>In order to ensure that all the relevant and required information pertaining to a planning application is available at the time of submission of the application, to enable City Council and its delegated approval authorities to make informed decisions within the prescribed period of time, and to ensure that the public and other stakeholders have access to all relevant information early in the planning process, any or all the following information may be requested from applicants who apply for a <u>Privately Initiated Urban Growth Boundary Expansion</u>, amendments to <i>The London Plan</i>, amendments to the <i>Zoning By-law</i>, site plan approval, consents to sever, and approvals of plans of subdivision, including condominiums.</p>	<p>Revised to add Privately Initiated Urban Growth Boundary Expansion as a specific type of application.</p>
3.	<p><u>Reports/Studies To Address the Privately Initiated Urban Growth Boundary Expansion Application</u></p> <p><u>1609A The submission of reports and studies related to the Privately Initiated Urban Growth Boundary Expansion Application is to demonstrate that a proposed</u></p>	<p>Add new report/study title to specify the new category of report/study</p> <p>Add a new policy that establishes requirements for the reports and studies as being required prior to deeming an application complete</p>

Policy	Proposed Changes (Delete, Add)	Rationale/summary of changes
	<p><u>application is required to meet projected growth over the planning horizon and meet provincial requirements for minimum land to accommodate future growth. Further guidance is provided in the Other Guidelines part of the Our Tools of this Plan.</u></p> <p><u>1609B The required reports/studies are to specifically address Urban Growth Boundary Policies.</u></p> <p><u>1609C Studies required to evaluate the need for the Privately Initiated Urban Growth Boundary Expansion Application will be determined by the City at the time of the request based on site specific context. The studies will be prepared and may be peer reviewed at the owner/applicant's expense. The peer review, if required, is to be prepared by a Professional Land Economist (PLE) or qualified Registered Professional Planner (RPP) with experience in growth projections and land needs assessments, to the satisfaction of the City of London. The Our City Chapter of this Plan and Guideline Documents part of this Plan provide more guidance on evaluation criteria.</u></p> <p><u>1609D In addition to the Neighbouring Municipalities And First Nations Communities section of the Our Tools Chapter, the appropriate Indigenous communities shall be invited to participate early in the community engagement process. A Record of Indigenous Consultation shall be submitted as part of a complete application and shall include all documents provided to and received by the appropriate Indigenous communities that demonstrates that the applicant has:</u></p> <ul style="list-style-type: none"> • <u>Informed the appropriate Indigenous communities of the proposed application and requested feedback;</u> • <u>Held meetings and/or received comments from the Indigenous communities and provide the City with a record of comments received.</u> 	<p>Add a new policy that references the Urban Growth Boundary Policies to be addressed.</p> <p>Add a new policy that ensures appropriate studies are submitted and prepared and peer-reviewed by qualified professionals.</p> <p>Add a new policy that ensures early and inclusive engagement with the appropriate Indigenous Communities. Establishes that the Record of Indigenous Consultation be submitted to form a complete application submission.</p>

	Policy	Proposed Changes (Delete, Add)	Rationale/summary of changes
4.	1722_	<p>The following is the list of Other guideline documents:</p> <ul style="list-style-type: none"> • Condominium Submission, Review and Approval Guidelines • <u>Guidelines for Privately Initiated Urban Growth Boundary Expansion Application Growth Projections Assessment</u> 	Add a new sub policy to specify the Guidelines for Privately Initiated Urban Growth Expansion Application Growth Projections Assessment
5.	1795_	<p>Comprehensive Review means a review of the London Plan to ensure that the Plan has regard to the matters of provincial interest identified in the <i>Planning Act</i> and is consistent with the <i>Provincial Policy Statement</i>. Any comprehensive review of the London Plan will be conducted consistent with the definition of a “comprehensive review” in the <i>Provincial Policy Statement</i>.</p> <p>...</p> <p>Official Plan Review means a review of the London Plan to ensure that the Plan has regard to the matters of provincial interest identified in the <i>Planning Act</i> and is consistent with the <i>Provincial Planning Statement</i>.</p> <p>...</p> <p>Privately Initiated Urban Growth Boundary Expansion Application means an official plan amendment application submitted under the <i>Planning Act</i> to the City of London to amend the location of the Urban Growth Boundary.</p>	<p>Clarifies that the definition is removed for consistency with the Provincial Planning Statement, 2024.</p> <p>Clarifies that the City undertaking an Official Plan Review and update to the urban growth boundary is supported in the Official Plan.</p> <p>Clarifies that privately initiated urban growth boundary expansion applications are distinct from the City undertaking an Official Plan Review and update to the urban growth boundary.</p>

Guidelines for the Privately Initiated Urban Growth Boundary Expansion Application Growth Projections Assessment

Purpose

The Guidelines for the Privately Initiated UGB Expansion Application Growth Projections Assessment outline the requirements for the Growth Projections Assessment, which shall be submitted with a Privately Initiated UGB Expansion Application under the *Planning Act*.

The purpose of the Growth Projections Assessment is to evaluate the need for the boundary expansion to accommodate future community growth and/or future industrial growth for the defined planning horizon of *The London Plan*.

Content

The Growth Projections Assessment shall:

1. Address Policy 78 of the London Plan by providing the growth projections, assumptions, methodology, targets and detailed calculations that were applied to assess projected demand and projected land supply for comparison with the existing designated land supply as identified in the current Land Needs

Assessment to determine whether adequate land supply is available for the planning horizon of the London Plan. The Growth Projections Assessment will contain the following information:

- a. Population data from one of the following sources:
 - The Ministry of Finance population projections for Middlesex County includes the City of London; or
 - Current Council-approved Growth Projections Study.
- b. Macro-economic outlook as the foundation for the projection in five year increments for the defined planning horizon of the London Plan. Provide data and commentary on the following:
 - Provincial and regional trends and review of recent City of London economic development initiatives and anticipated impacts on the economic outlook and employment projection.
- c. Employment projection in five year increments for the defined planning horizon of the London Plan. Provide data and commentary on the following:
 - Analysis of employment trends by sector;
 - Overview of historic and projected place of work employment; and,
 - Historic employment figures and employment projection by industry for Ontario, the London Census Metropolitan Area and the City of London.
- d. Population projection by age and sex in five year increments for the defined planning horizon of the London Plan. Provide data and commentary on the following for the City of London:
 - Historic and projected trends for births and deaths, natural increase, migration and historic population.
- e. Household formation and residential units projection by total type and tenure in five-year increments for the defined planning horizon of the London Plan, including the following:
 - Provide historic and projected trends related to headship rates, propensities by structure type and sub-type, household growth by structure type, people per unit and density assumptions, and overview of Provincial policies on intensification and affordability;
 - Review of historic and projected unit construction by type and tenure for the City of London including a review of the City of London vacant land inventory, Growth Management Implementation Strategy;
 - Commentary related to Provincial Plans and City of London housing and jobs targets; and
 - Commentary on adjustments made from housing demand model and/or employment growth forecast, if applicable.
- f. Allocation modelling by population change in existing and new units in five-year increments for the defined planning horizon of the London Plan including historical and projected persons per unit by housing type.
- g. Projection of non-residential space requirements by sector (industrial, office, retail, and institutional) in five year increments for the defined planning horizon of the London Plan, including the following
 - Overview of trends in construction by sector;
 - Review of non-residential vacant land inventory and existing land supply; and
 - Assumptions used to determine required non-residential space based on historical and projected trends;
- h. Scenarios: Provide low, medium and high scenarios for the projections described in items c, d, e and g above. Provide brief descriptions of the

changes from the baseline projections and tables for population, employment, residential unit construction and non-residential space construction for each scenario.

- i. Expected deliverables:
 - Study Report including executive summary and description of methodology used for projections, and citations of sources used for assumptions in report for commentary and tables;
 - Graphical representation of forecast model showing steps in sequence and interdependencies of various steps including technical appendix of assumptions used in model and report and master file providing digital versions of all tables used in the final report (hardcoded and without proprietary information);
 - Geographic Information Systems files (where applicable); and,
 - Other applicable materials.
2. Evaluate the consistency of the proposed expansion area with the London Plan, including the City Structure Plan.

Resources

The Growth Projections Assessment shall be based on and informed by the following documents:

- The London Plan;
- Current Vacant Land Inventory provided by the City of London;
- Current Land Needs Assessment for Community Growth and/or Employment Area completed by the City of London;
- Current Council-approved Growth Projections Study;
- “Projection Methodology Guideline” provided by the Province of Ontario; and
- Current population projections provided by the Ministry of Finance.

Preparation

The Growth Projections Assessment shall be prepared by a Professional Land Economist (PLE) or Qualified Registered Professional Planner (RPP) with experience in completing Growth Projections Assessments, to the satisfaction of City of London.

A peer review of the Growth Projections Assessment may also be required to the satisfaction of the City of London.

Appendix E – Key Considerations for Evaluation

Servicing Considerations

Infrastructure to support growth was a key consideration for the evaluation of lands to be brought forward for proposed expansion. *PPS* policy 2.3.2.1b states that planning authorities shall consider sufficient capacity in existing or planned infrastructure and public services for settlement area expansion. Consistent with provincial direction, staff determined a hierarchy of servicing infrastructure and identified appropriate extensions for servicing based on current Master Servicing Plans and full build out of candidate expansion areas. Given the large scale of the expansion, significant infrastructure works would be required to meet the demands of the projected population including transportation, water, wastewater, and stormwater services.

The downstream impact on wastewater treatment plant (WTP) capacity was identified as a major cost and constraint related to the serviceability of lands. While both plants and pumping station capacity demonstrate constraints in different urban areas, the WTP upgrades at full build-out demonstrate the largest cost and constraint. Key servicing considerations include the speed and certainty of process timing (e.g. Environmental Assessment, land acquisition, intergovernmental agreements); minimizing costs and WTP upgrades; minimizing environmental impact; minimizing impact on Indigenous communities; minimizing impact on neighbouring municipalities; ensuring a servicing solution is addressed in the sewer shed and not leapfrogging to a further sewer shed; and recognizing both intensification and greenfield development with some plants primarily treating growth in the form of intensification and infill.

A magnitude of costs associated with full build-out of the candidate UGB areas was calculated to determine the ranking of servicing costs by sewer shed (see Figure 1).

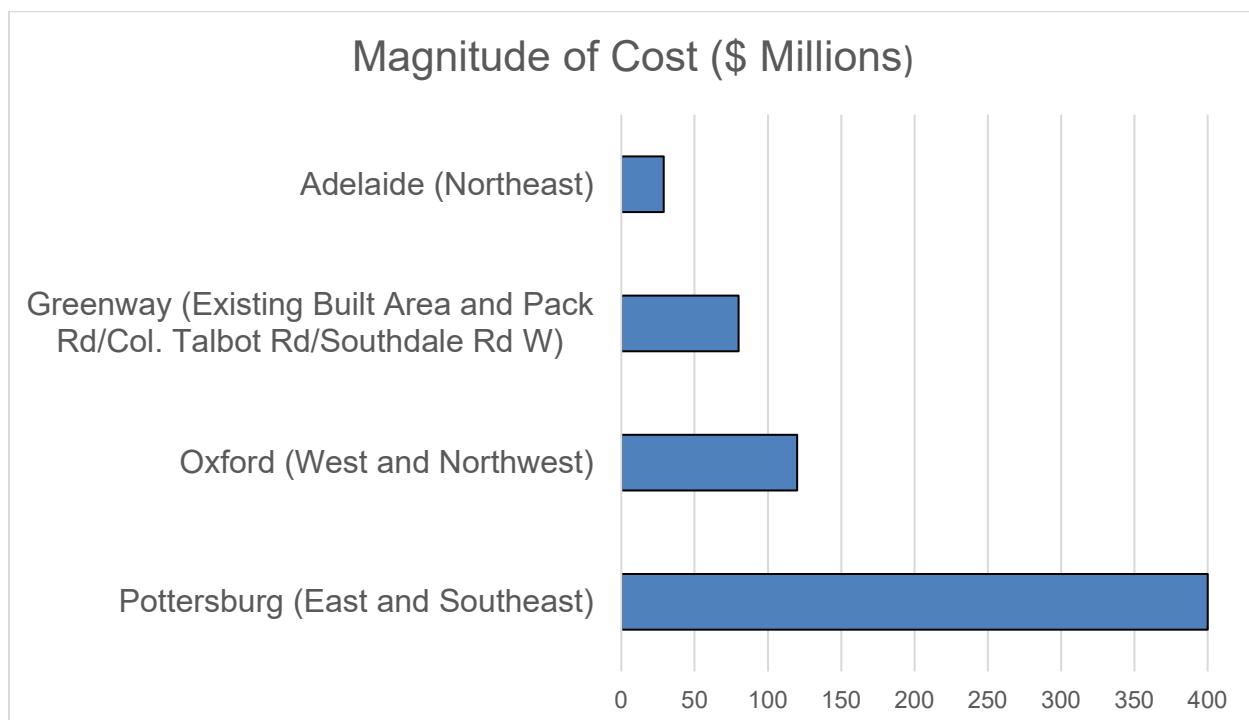


Figure: Wastewater Treatment Plant Expansion Costs (per \$ Million)

The financial impact associated with urban expansion is dependent on the location growth within the City's boundaries. Notably, urban expansion in East and Southeast London carries the highest financial impact due to the costs associated with capacity upgrades for Pottersburg WTP.

It should be noted that the Pottersburg WTP upgrade estimate includes the decommissioning of the Vauxhaull WTP; however, approximately half of the Pottersburg upgrade cost is anticipated to be a growth cost (i.e. roughly \$200 Million of the \$400 Million). As a result, servicing the East and Southeast areas is roughly

twice as expensive as upgrades to Oxford and Greenway WTPs which service the West and Northwest. The Northeast sewer shed attributed to Adelaide WTP is the most cost-effective area for servicing growth cost.

In addition to upgrades at existing plants, there was also consideration of the previous “Southside” wastewater treatment plant. This plant was previously refused by Council as the servicing solution for the southern and westernmost areas of the municipality south of Dingman Creek. It continues to not be supported for reasons that include:

- The requirement for a 5.5 km pipe outlet from the proposed plant site to an outlet in the Thames River, which would be located outside of the municipality;
- Requirement for the City to enter agreements with external municipalities;
- Possible land acquisitions or expropriations with uncertainty of timing;
- A significant Environmental Assessment (EA) and predesign process (for a new plant) not consistent with City objectives of acceleration of housing development;
- Significant Indigenous consultation required through the EA;
- Significant impacts on Indigenous communities with location of the sewer/effluent outlets in proximity to Indigenous communities on the Thames River (Oneida, Chippewas and Munsee-Delaware); and
- Unresolved concerns of Indigenous groups regarding the “Southside” WTP and location, particularly related to effluent outlets, environmental impact, and health associated with drinking water (certain communities are not on municipal water).

These considerations were factored into the draft UGB and determination of appropriate locations and quantity of growth by area of the city.

Beyond the noted financial considerations, factors such as: environmental impacts, Indigenous concerns, certainty of process timing, and appropriateness of servicing strategy were also included within the evaluation. Staff have made recommendations which attempt to provide opportunities for growth throughout the candidate block areas while limiting negative impacts associated with the allocation of growth-related infrastructure and capacity.

Agricultural Impact Assessment

An assessment of agricultural impact related to UGB expansion was undertaken to ensure lands planned for farmland can maintain their viability as agricultural areas. Where new urban areas are proposed, urban uses are directed to areas that avoid prime agricultural soils and livestock facilities, where possible. Where avoidance is not possible, mitigation measures are to be undertaken.

The London Plan identifies the vision for the farmland place types as landscapes characterized by viable agricultural fields which support general farming, livestock farming, cash crop farming, market gardening, specialty crops, nurseries, forestry, aquaculture, and agricultural research. Furthermore, policy 1179 in *The London Plan* recognizes the farmland place type as the prime agricultural area of London, consisting of prime agricultural (Canada Land Inventory Classes 1, 2, and 3 soils, which are the highest ranking soils) and then associated class 4 through 7 soils.

In order to remove agricultural land for urban expansions, municipalities are to evaluate alternative locations which avoid prime agricultural areas and, when avoidance is not possible, consider reasonable alternatives in lower priority agricultural lands (PPS s. 2.3.2d). Consistent with provincial direction, the draft proposal for expansion contemplates the avoidance of fragmented farmland patterns and loss of prime agricultural land, where possible.

As identified on the OMAFA (Ministry of Agriculture, Food and Agribusiness) Soil Survey Map in Appendix “D” [of the Official Plan Review of *The London Plan*: Draft Urban Growth Boundary Review (Community Growth), File Number: O-9595 Staff Report to Planning and Environment Committee on June 23, 2025], the urban area of London is surrounded primarily by soil Classes, 1, 2 and 3 (i.e. prime agricultural

soil classes). Soil classification is, therefore, not a determining factor in evaluating the direction for growth for the UGB expansion. Where feasible, lower-class soils are identified in the draft expansion areas, but avoidance of prime agricultural soil classes is not possible.

In addition to soil classification, setbacks from livestock barns are also a means to ensure protection and compatibility with existing farm operations. These setbacks are known as “Minimum Distance Separation” (MDS). For the purposes of expanding an urban boundary, *PPS* subsection 2.3.2 (e) directs that municipalities are to consider whether the expanded settlement area complies with the minimum distance separation formulae. Guidelines for calculating MDS formulae are provided by OMAFA. Consistent with Provincial requirements, policy 1773 in *The London Plan* directs that proposed planning and development applications for lands outside the UGB, and proposals to expand the UGB, shall meet the required odour setbacks in accordance with MDS (I) Implementation Guidelines and Formulae. Moreover, policy 1775 provides application criteria regarding MDS I compliance.

An MDS study has been completed for barns located on or in proximity to the landowner requested sites, and other candidate expansion blocks (See Appendix “C” [of the Official Plan Review of *The London Plan*: Draft Urban Growth Boundary Review (Community Growth), File Number: O-9595 Staff Report to Planning and Environment Committee on June 23, 2025, for MDS related to community growth]. The calculations have been prepared based on the OMAFA Implementation Guidelines and are made available for further consultation purposes. MDS Policies of *The London Plan* and OMAFA’s Implementation Guidelines will be applicable for lands entering future development application processes.

Provincial agricultural impact assessment guidance also identifies that if avoidance is not possible, a number of measures can be taken to mitigate impacts. Mitigation measures include phasing of development to prevent premature loss of agricultural land, maintaining of farm parcels, and expanding the UGB in a manner that minimizes fragmentation of agricultural land.

The purpose of the draft UGB and future planning initiatives to phase growth is to align with the goals of minimizing fragmentation, including maintaining a cohesive, planned rural area of the municipality (Rural London) south of Dingman Creek.

Natural Heritage

The Environmental Policies in *The London Plan* provide clear guidance on how the natural heritage system should be protected, conserved, and enhanced. Natural Heritage policies outlined in *PPS* subsection 4.1.1 state that natural features and areas shall be protected for the long term. Consistent with the above noted policies, submissions were evaluated based on features identified on Map 5 (Natural Heritage) and Map 6 (Hazards and Natural Resources) of *The London Plan*. Evaluation criteria considered the presence of natural and human-made hazards related to the feasibility of development. The evaluation results are representative of both presence and scale of natural features. Where avoidance is not possible, it is expected that mitigation efforts will be undertaken through the complete application requirements through planning application process.

Consistent with December 17, 2024, Council Direction, staff have identified approximately 1,476 ha of developable land to accommodate planned growth. The developable area is approximately 1,431 to 1,530 hectares, if applying a buffer range of 20 to 30 metres from natural features. Developability was determined based on minimum buffer widths for protected natural heritage components. Consistent with the determination process outlined in the Environmental Management Guidelines (EMG), ultimate buffer widths can only be confirmed at the site-specific Environmental Impact Study (EIS) stage. As such, realized buffers will vary depending on the presence of significant natural features.

Both Green Space and Environmental Review lands have been discounted from the developable land supply. Buffers were then applied to lands immediately surrounding these natural heritage features. As noted above, future development application processes may require an EIS. The EIS may determine that certain Environmental Review lands do not include an environmental feature and therefore are developable lands. Additional developable lands may be found through such studies, which in turn have the potential to increase the size of developable area in the lands identified in draft UGB expansion.

Maps showing Natural Heritage Systems within the proposed areas for expansion are included in Appendix "E" of [the Official Plan Review of The London Plan: Draft Urban Growth Boundary Review (Community Growth), File Number: O-9595 Staff Report to Planning and Environment Committee on June 23, 2025].

Appendix F – Minimum Distance Separation Study

Below is the preliminary list of livestock facilities and unoccupied barns included for Minimum Distance Separation calculations within the draft Urban Growth Boundary Review (Employment Areas). Type A land uses (less sensitive) were determined as part of the settlement area boundary expansion. OMAFA's AgriSuite software was utilized for MDS I setbacks calculations.

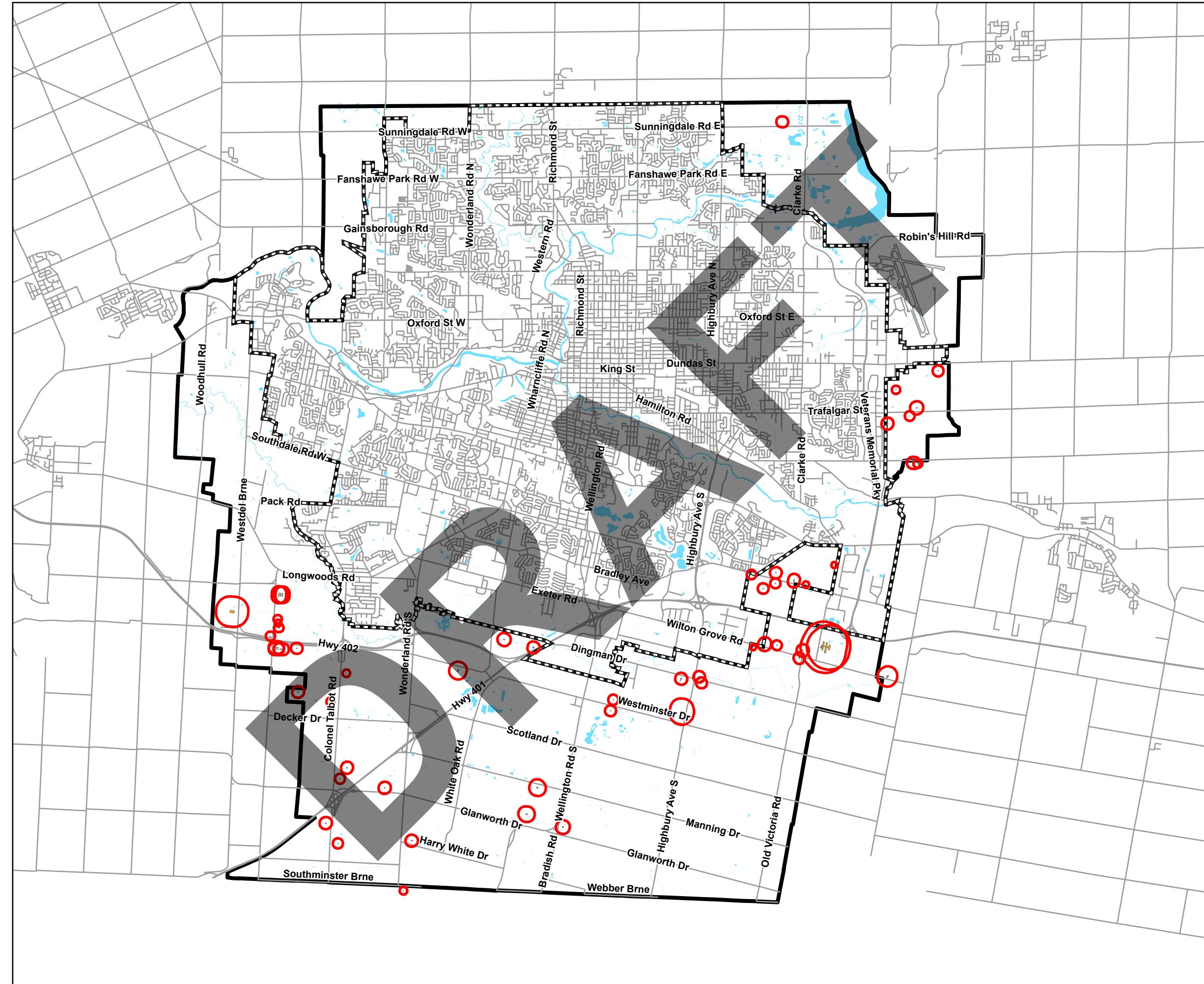
Municipal Address	Type of Livestock / Material	Estimated Maximum Capacity	Required setback (m) from nearest livestock building MDS I Type A
4522 Highbury Ave S	Dairy, Milking-age Cows (dry or milking) Large Frame (545 - 658 kg) (eg. Holsteins), 3 Row Free Stall	38	145
4231 Westminster Dr	Dairy, Milking-age Cows (dry or milking) Large Frame (545 - 658 kg) (eg. Holsteins), 3 Row Free Stall	165	230
7673 Westminster Dr	Chickens; Broiler breeder layers (males/females transferred in from grower barn); Cages	10458	173
4598 Murray Rd	Chickens; Broiler breeder layers (males/females transferred in from grower barn); Cages	15938	200
4598 Murray Rd	Chickens; Broiler breeder layers (males/females transferred in from grower barn); Cages	14603	194
2700 Westminster Dr	Unoccupied Livestock Barn	NA	137
4454 Highbury Ave S	Dairy, Milking-age Cows (dry or milking) Large Frame (545 - 658 kg) (eg. Holsteins), 3 Row Free Stall	45	153
4594 White Oak Rd	Unoccupied Livestock Barn	NA	175
5503 Colonel Talbot Rd	Horses; Large-framed, mature; > 680 kg (including unweaned offspring)	12	103
4842 Murray Rd	Horses; Large-framed, mature; > 680 kg (including unweaned offspring)	6	87
2907 Dundas St	Unoccupied Livestock Barn	NA	149
3489 Gore Rd, Dorchester	Horses; Large-framed, mature; > 680 kg (including unweaned offspring)	17	112
3401 Gore Rd, Dorchester	Unoccupied Livestock Barn	NA	170
2735 Trafalgar St	Unoccupied Livestock Barn	NA	133
764 Crumlin Sideroad	Unoccupied Livestock Barn	NA	161
7527 Westminster Dr	Unoccupied Livestock Barn	NA	153
4798 Murray Rd	Horses; Large-framed, mature; > 680 kg (including unweaned offspring)	14	108
2145 Dingman Dr	Dairy, Milking-age Cows (dry or milking) Large Frame (545 - 658 kg) (eg. Holsteins), 3 Row Free Stall	52	158

Municipal Address	Type of Livestock / Material	Estimated Maximum Capacity	Required setback (m) from nearest livestock building MDS I Type A
2145 Dingman Dr	Dairy, Milking-age Cows (dry or milking) Large Frame (545 - 658 kg) (eg. Holsteins), 3 Row Free Stall	NA	167
1741 Wilton Grove Rd	Horses; Large-framed, mature; > 680 kg (including unweaned offspring)	1	81
1806 Wilton Grove Rd	Dairy, Milking-age Cows (dry or milking) Large Frame (545 - 658 kg) (eg. Holsteins), 3 Row Free Stall	76	175
1874 Wilton Grove Rd	Dairy, Milking-age Cows (dry or milking) Large Frame (545 - 658 kg) (eg. Holsteins), 3 Row Free Stall	30	132
1871 Bradley Ave	Unoccupied Livestock Barn	NA	144
1963 Bradley Ave	Unoccupied Livestock Barn	NA	137
2034 Wilton Grove Rd	Dairy, Milking-age Cows (dry or milking) Large Frame (545 - 658 kg) (eg. Holsteins), 3 Row Free Stall	63	165
1944 Bradley Ave	Unoccupied Livestock Barn	NA	156
2090 Bradley Ave	Horses; Large-framed, mature; > 680 kg (including unweaned offspring)	54	159
2122 Bradley Ave	Horses; Large-framed, mature; > 680 kg (including unweaned offspring)	5	85
2556 Wilton Grove Rd	Unoccupied Livestock Barn	NA	258
4811 Highbury Ave South	Dairy, Milking-age Cows (dry or milking) Large Frame (545 - 658 kg) (eg. Holsteins), 3 Row Free Stall	377	307
2017 Wilton Grove Rd	Dairy, Milking-age Cows (dry or milking) Large Frame (545 - 658 kg) (eg. Holsteins), 3 Row Free Stall	40	148
4811 Highbury Ave South	Dairy, Milking-age Cows (dry or milking) Large Frame (545 - 658 kg) (eg. Holsteins), 3 Row Free Stall	377	NA
5224 Colonel Talbot Rd	Horses; Large-framed, mature; > 680 kg (including unweaned offspring)	10	98
7673 Westminster Dr	Chickens; Broiler breeder layers (males/females transferred in from grower barn); Cages	10357	172
7673 Westminster Dr	Chickens; Broiler breeder layers (males/females transferred in from grower barn); Cages	9614	168
4931 Murray Rd	Unoccupied Livestock Barn	NA	126
4956 Murray Rd	Horses; Large-framed, mature; > 680 kg (including unweaned offspring)	19	115
4775 Westdel Bourne	Dairy, Milking-age Cows (dry or milking) Large Frame (545 - 658 kg) (eg. Holsteins), 3 Row Free Stall	835	405
1084 Crumlin Sideroad	Horses; Large-framed, mature; > 680 kg (including unweaned offspring)	14	108

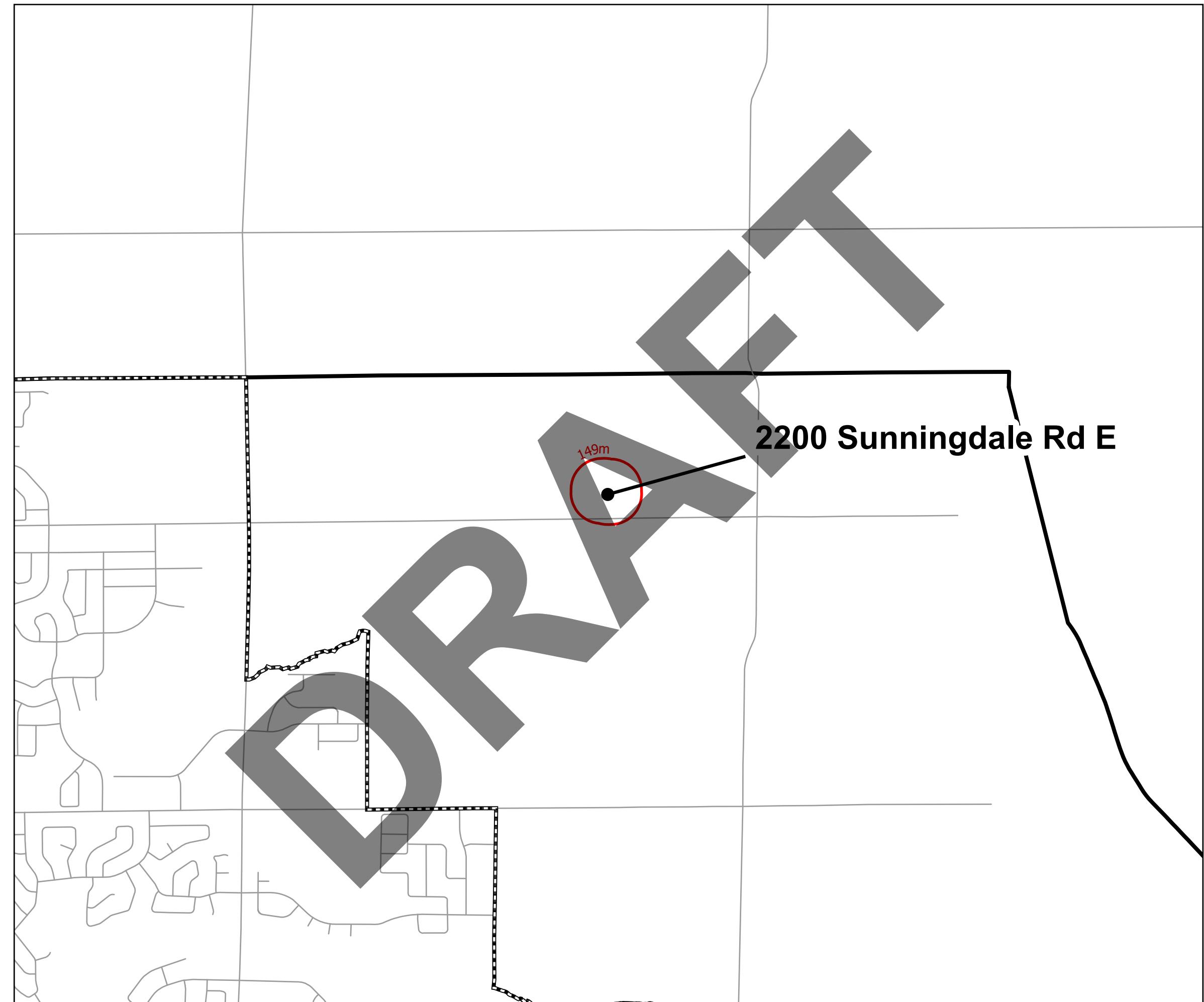
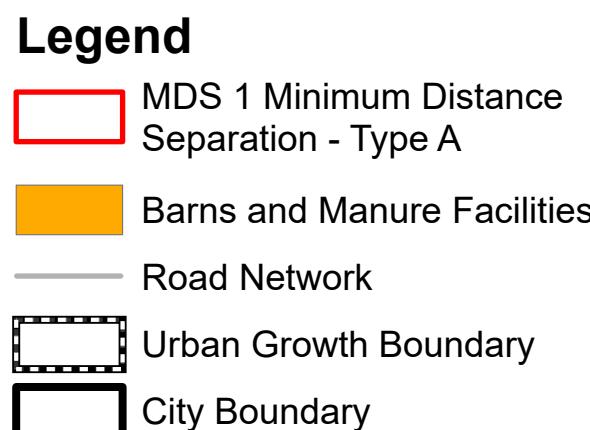
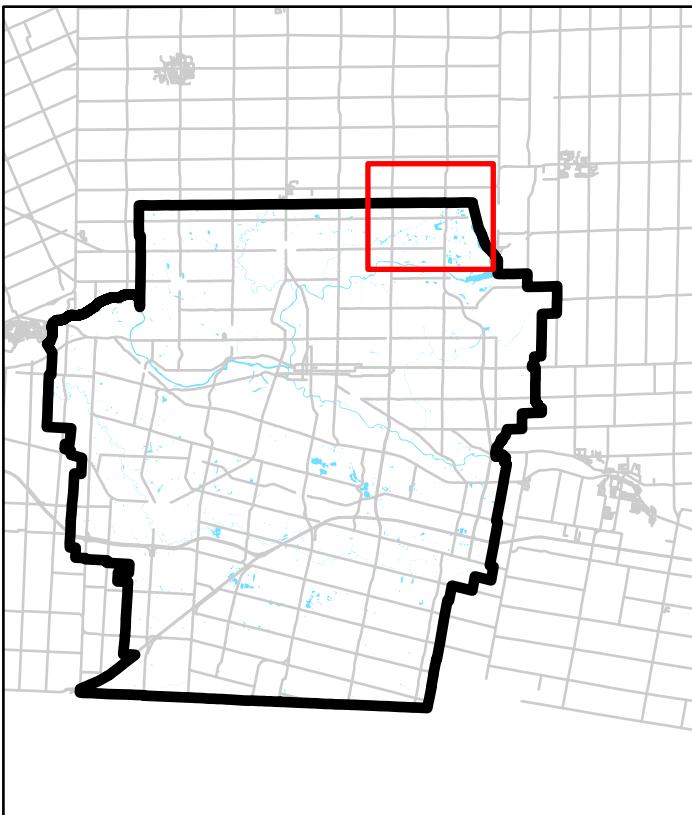
Municipal Address	Type of Livestock / Material	Estimated Maximum Capacity	Required setback (m) from nearest livestock building MDS I Type A
2806 Trafalgar St	Unoccupied Livestock Barn	NA	177
2759 Westminster Dr	Unoccupied Livestock Barn	NA	147
3243 Manning Dr	Unoccupied Livestock Barn	NA	218
1803 Bradley Avenue	Unoccupied Livestock Barn	NA	129
2539 Old Victoria Rd	Horses; Large-framed, mature; > 680 kg (including unweaned offspring)	3	81
3575 Dingman Dr	Horses; Large-framed, mature; > 680 kg (including unweaned offspring)	44	152
5461 Colonel Talbot Rd	Unoccupied Livestock Barn	NA	158
4598 Murray Rd	Chickens; Broiler breeder layers (males/females transferred in from grower barn); Cages	14531	194
2200 Sunningdale Rd E	Dairy, Heifers Large Frame (182 - 545 kg) (eg. Holsteins), Deep Bedded	117	149
6356 Bradish Rd	Beef, Backgrounders (7 - 12.5 months), Yard/Barn	227	181
6601 Wellington Rd S	Unoccupied Livestock Barn	NA	210
40970 County Rd 48, St Thomas	Horses; Large-framed, mature; > 680 kg (including unweaned offspring)	11	100
4262 Harry White Dr	Unoccupied Livestock Barn	NA	162
7002 Colonel Talbot Rd	Unoccupied Livestock Barn	NA	138
6787 Colonel Talbot Rd	Unoccupied Livestock Barn	NA	163
6272 Colonel Talbot Rd	Unoccupied Livestock Barn	NA	135
6172 Colonel Talbot Rd	Unoccupied Livestock Barn	NA	161
6304 Glanworth Dr	Unoccupied Livestock Barn	NA	163

Appendix G – Minimum Distance Separation (Employment Areas)

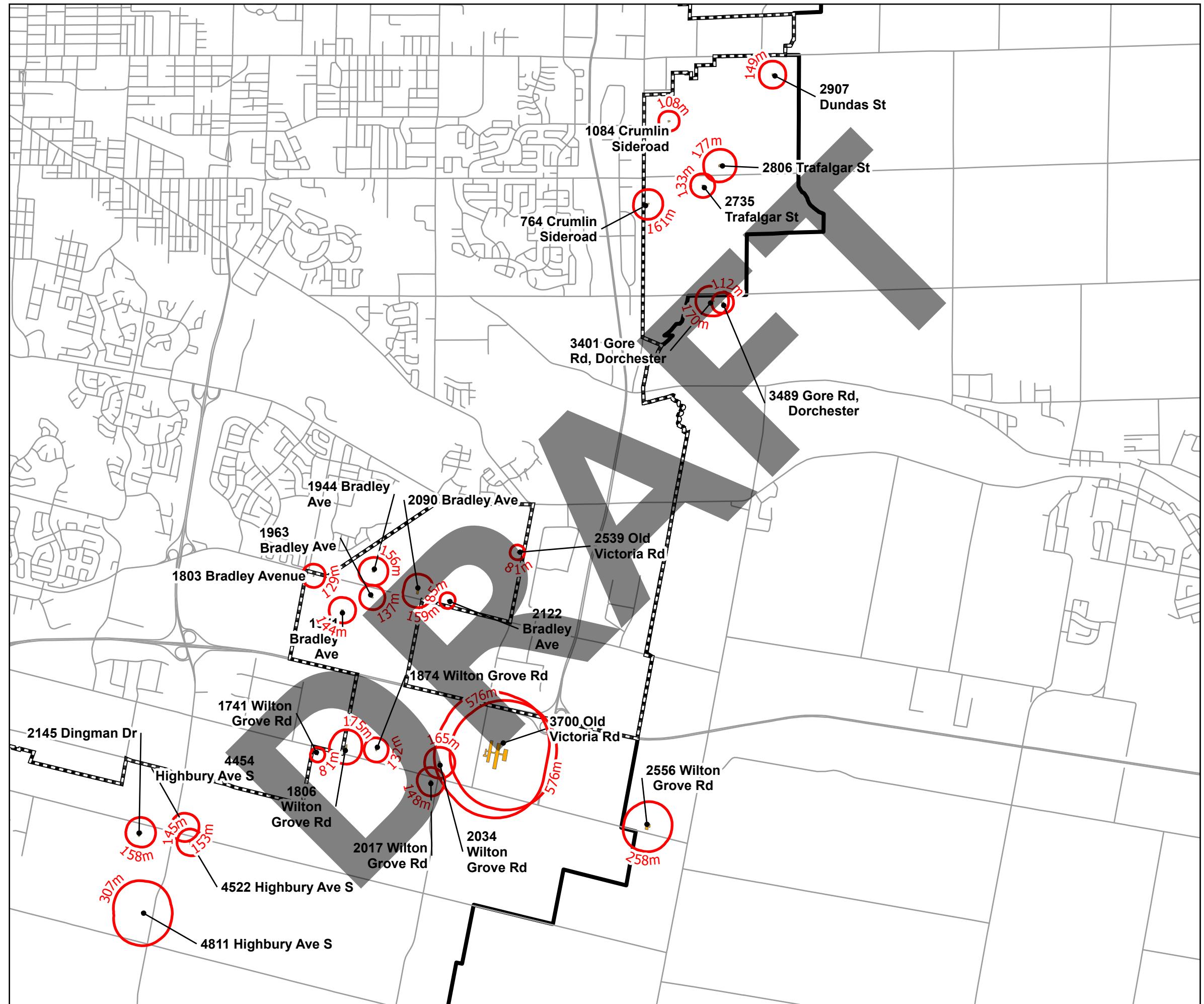
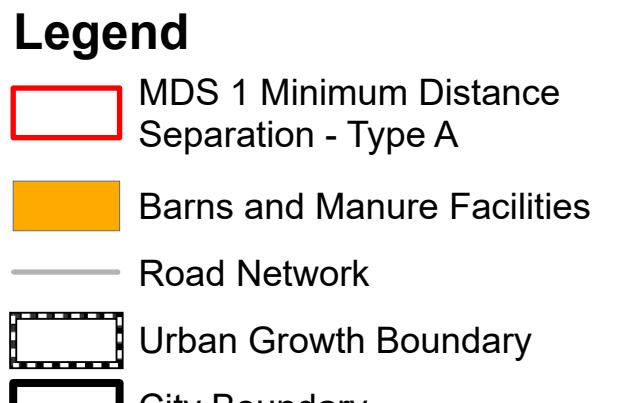
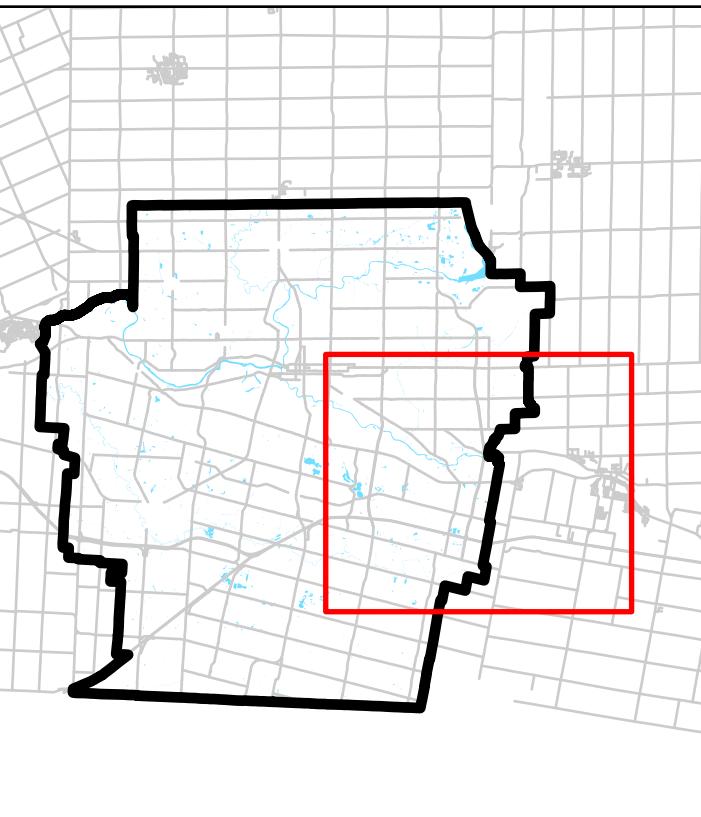
Preliminary Minimum Distance
Separation (MDS) Calculations
For Continued Consultation



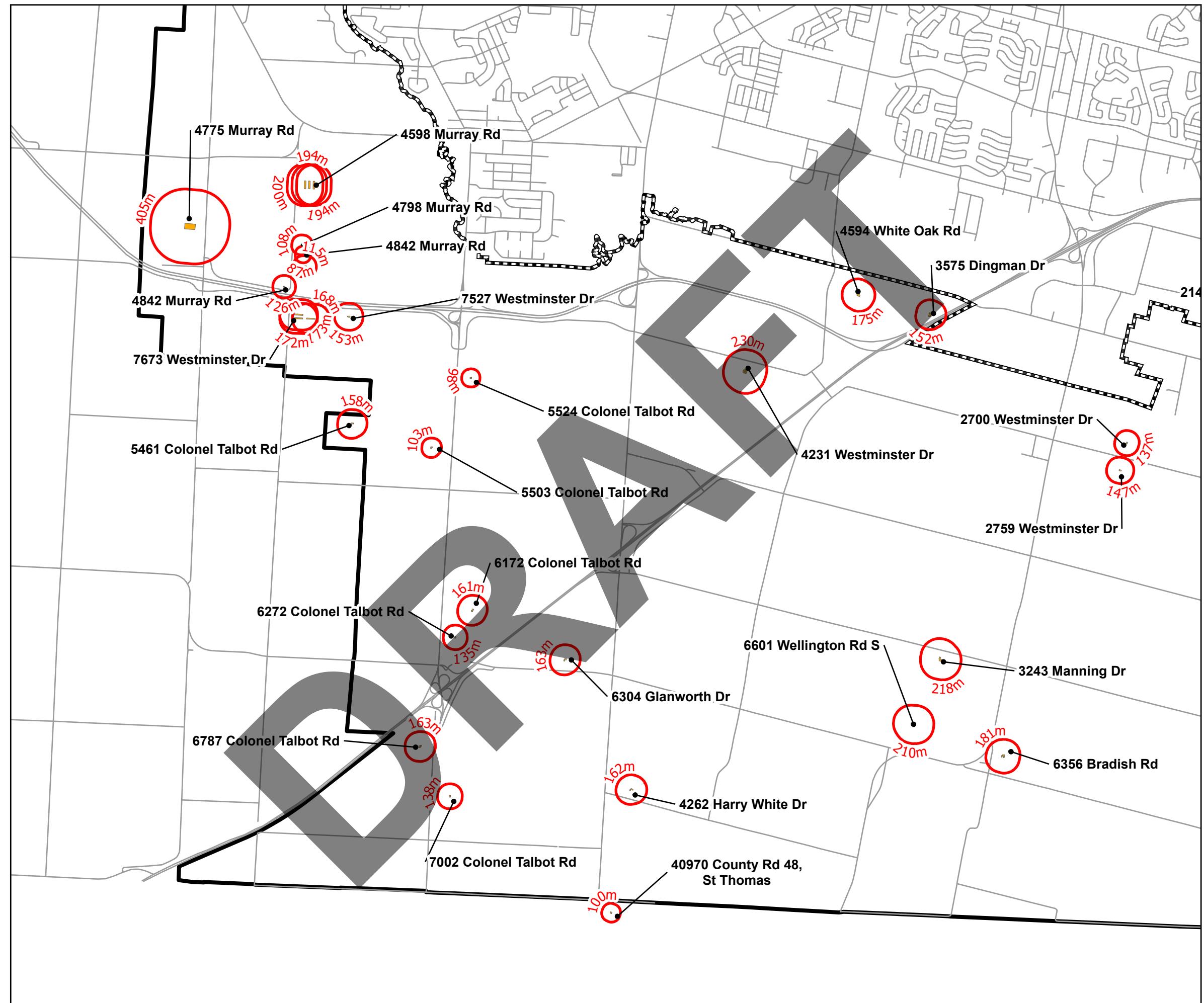
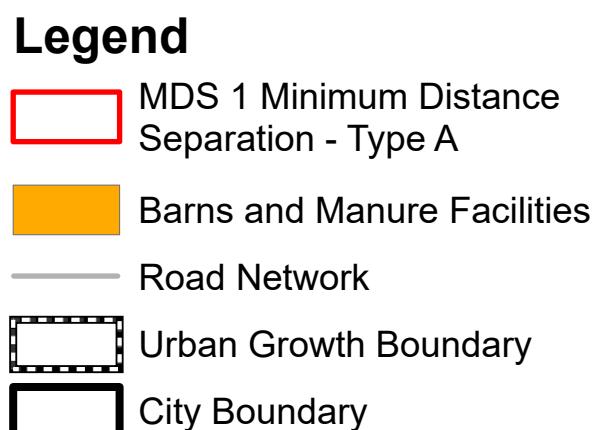
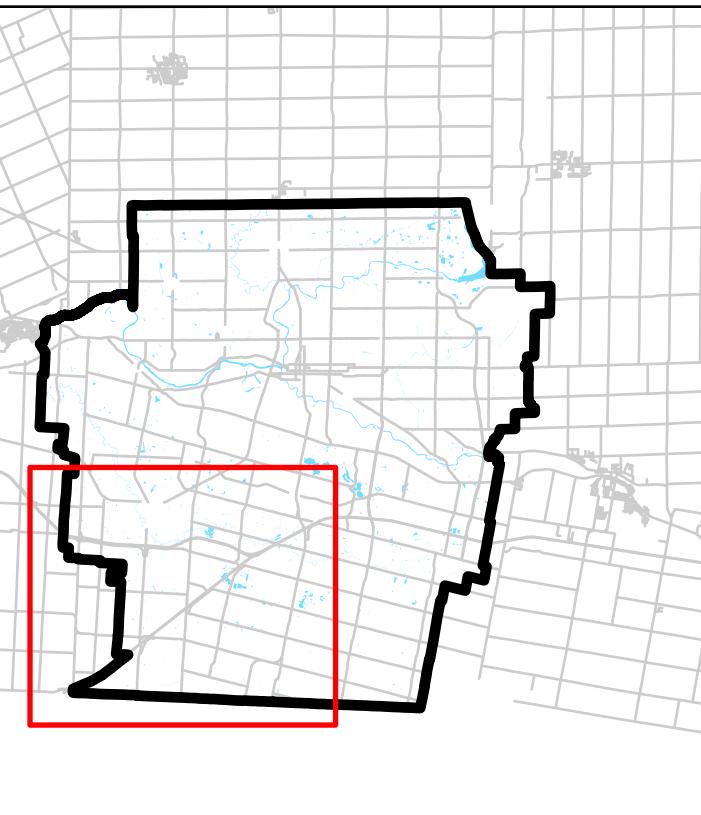
**Preliminary Minimum Distance Separation (MDS) Calculations:
North
For Continued Consultation**



**Preliminary Minimum Distance Separation (MDS) Calculations:
East
For Continued Consultation**



**Preliminary Minimum Distance Separation (MDS) Calculations:
Southwest
For Continued Consultation**



Appendix H – Minimum Distance Separation Data Collection Form



LETTER OF NOTICE - OFFICIAL PLAN REVIEW OF THE LONDON PLAN

City-wide - Draft Urban Growth Boundary Review (Community Growth)

The City of London is undertaking an Official Plan Review of The London Plan under Section 26 of the Planning Act.

Community Growth Land Uses

On December 17, 2024, Council directed an expansion of the current Urban Growth Boundary to designate more lands for urban land uses. The purpose and effect of the draft UGB Review is to identify a preliminary expansion area for the purposes of continued consultation. A map of the draft UGB expansion areas is attached to this letter and available on <https://getinvolved.london.ca/london-plan-review>. As part of a UGB expansion, municipalities are to consider OMAFA Minimum Distance Separation (MDS) from livestock barns, to ensure protection and compatibility with existing farm operations.

Data Collection - Information Regarding Livestock Facility

Staff has prepared preliminary calculations consistent with OMAFA Implementation Guidelines, Staff are respectfully reaching out to collect further information regarding livestock facilities within the MDS study area.

As a farm owner or operator within the MDS area, Staff are requesting information about livestock barns on your farm. Information requested is in the tables below.

Information regarding the existing facilities:

Facility Type	Present on the Lot? (yes or no)
Livestock barn and/or manure storage	

If the previous response was yes, please complete the following chart

Livestock Type	Livestock Description	Number of Livestock	Manure System (Solid or Liquid)

Contact Information – Farm Owner or Operator

First name	
Last name	
Telephone number	
Email	

For further details and to send existing livestock facilities information, please contact:

Felipe Parra Hein

Planner, Planning Policy (Growth Management)

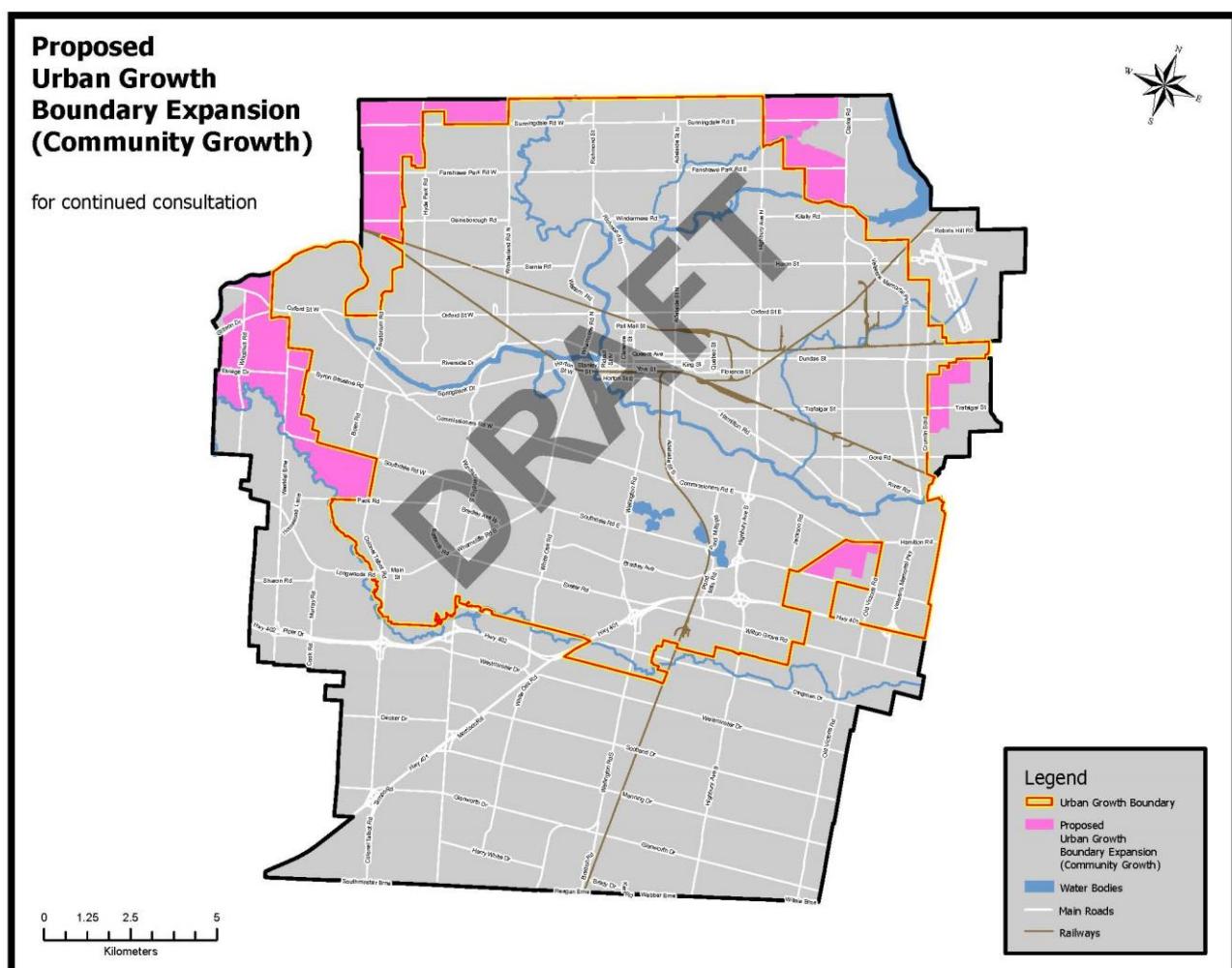
Email: fparra@london.ca

Phone: 519-661-2489 ext. 7049

201 Queens Ave, London, ON N6A 1J1

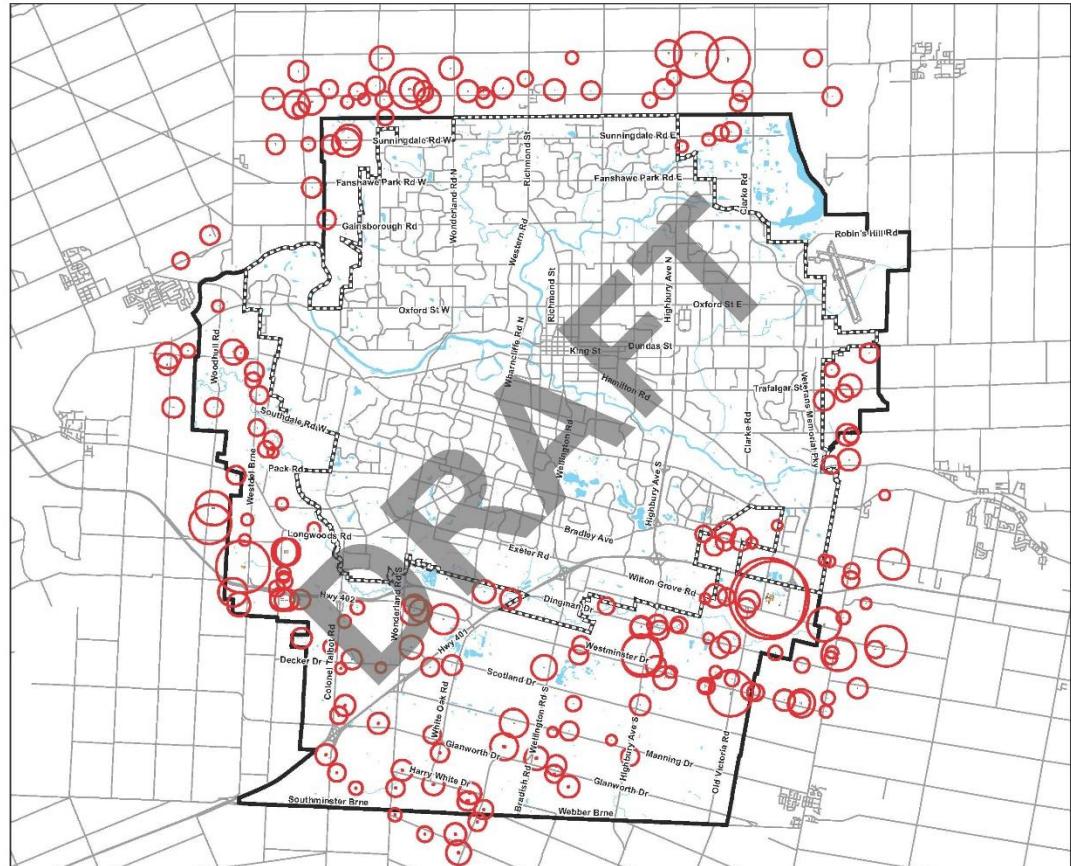
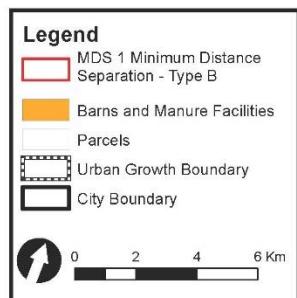
Proposed Urban Growth Boundary Expansion (Community Growth)

for continued consultation



Preliminary Minimum Distance Separation (MDS) Calculations

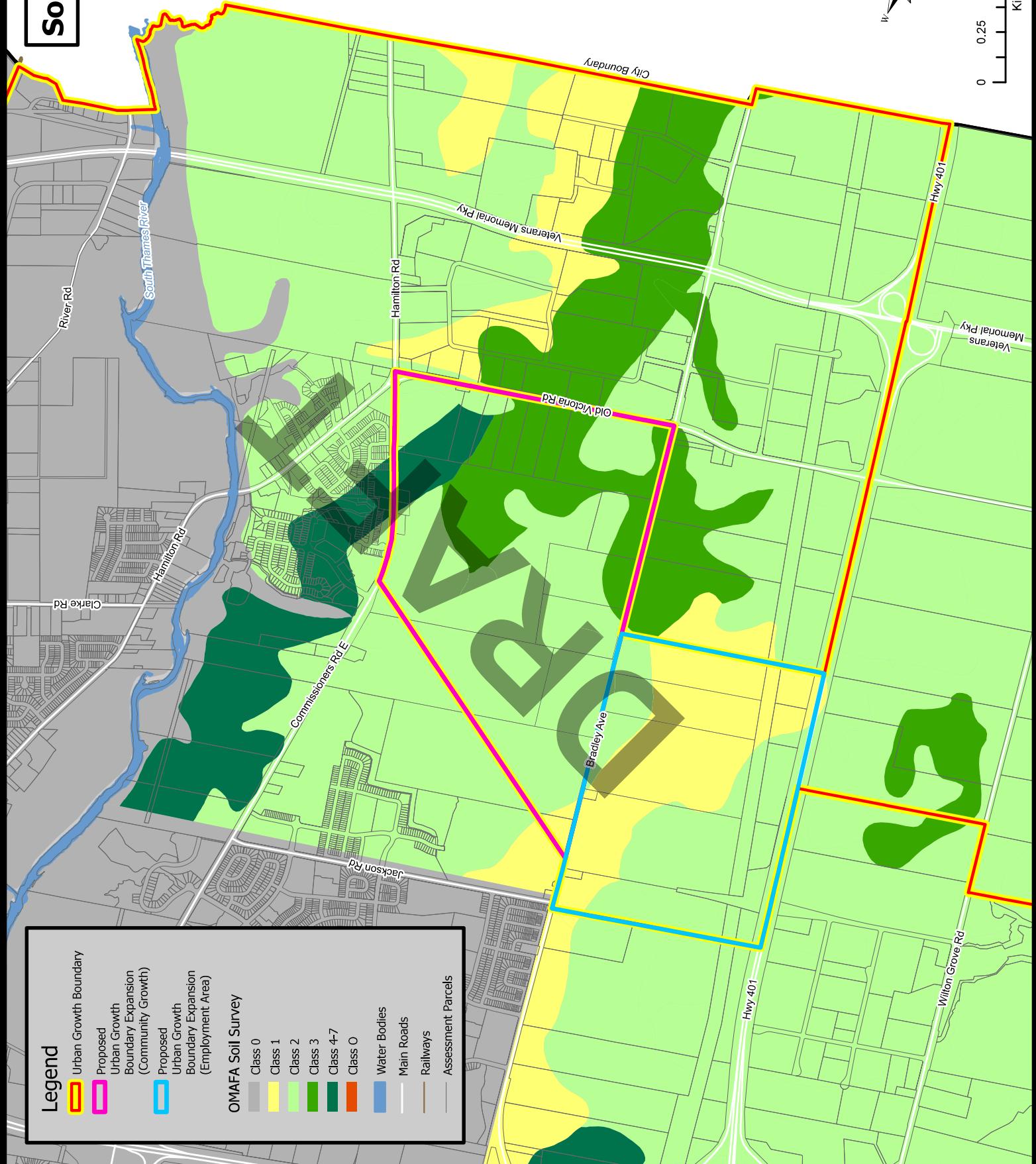
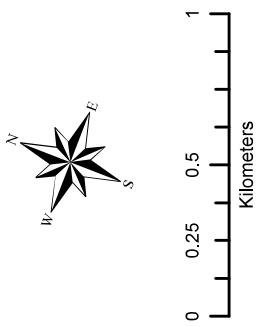
For Continued Consultation



Date of Notice: July 9, 2025

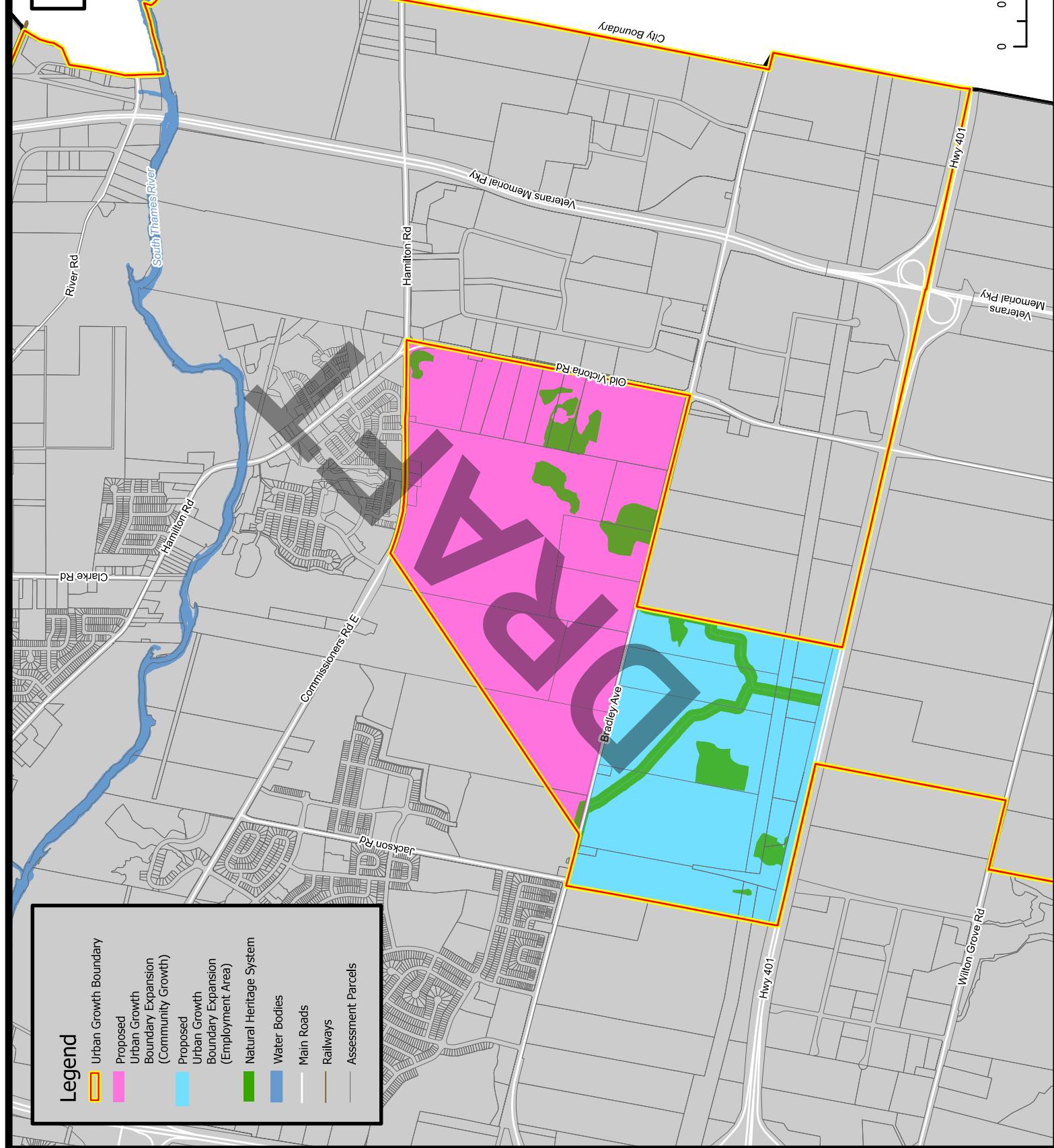
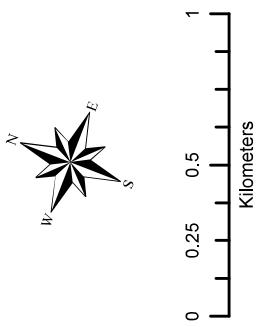
Appendix I – Soil Classification Survey

Southeast



Appendix J – Natural Heritage System

Southeast



Legend

- Urban Growth Boundary
- Proposed Urban Growth Boundary Expansion (Community Growth)
- Proposed Urban Growth Boundary Expansion (Employment Area)
- Natural Heritage System
- Water Bodies
- Main Roads
- Railways
- Assessment Parcels

Appendix K – Public Engagement

Public Comments

Public Comment #1 – K. and D. Gowanlock

Received: June 13, 2025

Dear Planning and Environmental Committee,

We are writing to you with our concerns with the proposed urban growth boundary expansion that encompasses our property at [REDACTED], London. On the map provided by the city on your website, the proposed growth area includes our property, which runs North of Dingman Creek along Woodhull Road to the city limits on the west city boundary engulfing all the land to the North along Woodhull Road.

We appreciate that London needs to expand its growth boundary, but at what cost. We oppose the expansion of this urban growth area for the following reasons:

- The proposed growth area, north of Dingman Creek, and east of Woodhull, is all forests and wildlife with some homes up to Elvage. This is an area of significant erosion potential and a vast floodplain. There is no potential for development in this area due to the landscape.
- On the west side of Woodhull is prime farmland, presently farmed as rotating crops. It would be a shame to eliminate this farmland for the purpose of building homes. Good farmland is becoming scarce, and we must remember, we still need to feed people.
- A significant amount of this proposed growth area is protected by the Upper Thames Conservation Area. This is an area with significant amount of wildlife, including the protected bald-headed eagles.
- Building this far from the London core would take significant investment in infrastructure. Given the horrible state of our downtown core, the city should be making investments to improve and revitalize the downtown, where a significant investment is already being made in the Bus Rapid Transit.
- Logically it makes far more sense to develop to the south of London, where the 400 series highway and major arteries and transit system already exist.

We would appreciate it if you considered the above points.

Thank you for the opportunity to provide feedback.

Public Comment #2 – Chief J. Todd Cornelius Oneida Nation of the Thames Elected Council

Received: June 19, 2025

RE: Comments on Proposed Urban Growth Boundary Expansion

Introduction

The Oneida Nation of the Thames is a sovereign Haudenosaunee Nation located immediately southwest of the City of London. As treaty holders, we are stewards of the land guided by the principles of sustainability, spiritual responsibility, and intergenerational care—often referred to as the “Seven Generations” principle. We respectfully submit the following comments on the City of London’s proposed Urban Growth Boundary (UGB) expansion, with specific concern regarding proposed development south of Dingman Creek.

1. Dingman Creek Corridor – Ecological and Cultural Significance

Oneida Nation opposes any expansion of the Urban Growth Boundary south of Dingman Creek. This corridor is not only a vital watershed and ecological buffer, but

also part of our cultural landscape. It holds spiritual and environmental significance for our people, and any urban development in this area threatens the integrity of the land and the health of future generations.

Our requests:

- That City Council take a formal position opposing development south of Dingman Creek;
- That Indigenous perspectives, including traditional ecological knowledge (TEK), be formally embedded into long-term land-use planning;
- That this area be designated as a protected cultural and ecological corridor under municipal planning frameworks.

2. Respecting Inherent and Treaty Rights

We recognize that land-use planning falls under the jurisdiction of the City of London. However, this authority must be exercised in balance with the inherent rights of First Nation Peoples and Canada's constitutional obligations under Section 35 of the Constitution Act, 1982. The lands in and around the Dingman Creek corridor are part of our historic and contemporary use area. As such, decisions about growth and expansion must reflect the spirit and intent of treaty relationships and uphold the Honour of the Crown.

3. Collaboration Opportunities

We are ready to work in partnership with the City of London to:

- Develop joint environmental monitoring protocols for the Dingman Creek corridor in collaboration with the Upper Thames River Conservation Authority;
- Co-create culturally informed planning tools, including the identification of sensitive cultural landscapes and protocols for engagement;
- Lead public education and outreach campaigns that highlight the cultural, historical, and ecological value of areas at risk from development.

4. A Call for a Precautionary and Future-Oriented Approach

We urge City Council to apply a precautionary planning lens guided by the "Seven Generations" principle. The decisions made today will impact not only the current population but the wellbeing of generations to come—both Indigenous and non-Indigenous. We call for planning that respects the limits of ecological systems, acknowledges Indigenous laws and worldviews, and prioritizes the protection of sacred lands and waters.

Conclusion

The Urban Growth Boundary is more than a technical planning tool—it reflects values. Oneida Nation of the Thames asks that London's future growth reflect a shared commitment to reconciliation, sustainability, and Indigenous rights. We look forward to working together to ensure that the lands surrounding both our communities are protected, respected, and cherished.

Respectfully,
Chief J. Todd Cornelius
Oneida Nation of the Thames Elected Council

[end of attached PDF]

Public Comment #3 – P. Lombardi

Received: June 22, 2025

Re: Urban Growth Boundary and Proposed Expansion Area

We are legal counsel Mandeep Singh Sahi (the "Client"). Our Client owns a parcel of land situated at [REDACTED], City of London, Province of Ontario (the "Subject Property") and provides an opportunity for the City to expand its Urban Growth Boundary in the south easterly area of the City.

The Subject Property is uniquely situated immediately outside of the City's Urban Growth Boundary and presents a significant development opportunity for the City of London.

The Subject Property has easy and convenient access to the Highway 401 transportation corridor and is situated immediately to the south of the existing Urban Growth Boundary. The development of the Subject Property represents a logical progression of development for the City, utilizing the existing major transportation corridor situated at Highway 401 and Veterans Memorial Parkway.

There is no rationale for the exclusion of the Subject Property from being incorporated into the Urban Growth Boundary. Further, the progression of the development in the south easterly portion of the City allows for ease of access to the existing major transportation corridor.

The inclusion of the Subject Property in the Urban Growth Boundary is consistent with the Provincial Policy Statement 2024 that encourages the use of existing infrastructure and ability to provide a range of housing opportunities. The "squaring out" of the Urban Growth Boundary to include the Subject Property represents good planning, ensures cohesive growth in a manner that provides a range of housing types and development opportunities, and is consistent with the Provincial Policy Statement, 2024.

The Subject Property is situated immediately to the south of Highway 401, north side of Wilton Grove Road and just east of Old Victoria Road. The inclusion of the Subject Property in the south easterly quadrant of the City avoids further urban sprawl occurring at the northeast and northwest quadrants of the City and allows for the development of a broad range of housing types or alternatively an industrial park.

Summary

The Subject Property has easy access to the Highway 401 transportation corridor and due to its unique location and proximity to the existing Urban Growth Boundary should be properly included into the City of London's Urban Growth Boundary.

We trust this information is of assistance and are available to respond to any questions or provide clarification.

Yours truly,

Siskinds LLP

[end of attached PDF]

Public Comment #4 – P. Lombardi

Received: June 22, 2025

Re: Urban Growth Boundaries and Proposed Expansion Areas

We are legal counsel to Mt. Elgin Dairy Farms Ltd., London Dairy Farms Ltd., Sequin / Farhi Holdings Corporation (collectively the "Clients"). Our Clients own, operate and control a significant number of landholdings that provide opportunities for the City's growth through the expansion of the City of London's urban growth boundary.

Our Clients properties are uniquely situated immediately outside of the City's urban growth boundary and presents significant development opportunities for the City of London. This letter is further to our email of January 14, 2025 and letter of February 2, 2025 identifying the properties for inclusion into the City's urban growth boundary.

Our Clients properties are municipally identified as:

1. 3700 Old Victoria Rd London ON N6N 1R2

2. 2214 Wilton Grove Rd London ON N6N 1M7
3. 2034 Wilton Grove Rd London ON N6N 1M8
4. 2094 Wilton Grove Rd London ON N6N 1M8
5. 2338 and 2350 Wilton Grove Rd London ON N6N 1M6
6. 1811 Wilton Grove Rd London ON N6N 1M5
7. 2471 Wilton Grove Rd London ON N6N 1M8

All these properties have easy access to the Highway 401 transportation corridor with one property being situated on the south side of Bradley Avenue; and all the other properties being situated on the north or south side of Wilton Grove Road. The properties are all situated to the east of Highbury Avenue and to the west of Highway 74 (Westchester Borne).

All the properties provide a unique opportunity for the City to develop an industrial park and/or residential development on the north and south sides of the Highway 401 and Veterans Memorial Parkway. These properties have easy access to three major transportation routes to the City of London, surrounding areas and major transportation corridors including: the Highway 401, Highbury Avenue, Veterans Memorial Parkway and Westchester Borne (Highway 74).

All of the properties described below are situated in the immediate area of the urban growth boundary and proposed urban growth boundary expansion. These lands in close proximity to the Highway 401 transportation corridor and Veterans Memorial Parkway as recently upgraded by the City are appropriately identified for development opportunities.

The properties are more appropriately suited to development opportunities due to their unique location and existing transportation network as opposed to continuing to encourage urban sprawl in the northeast and northwest quadrants of the City.

The carves out in the urban growth boundary to exclude our Clients lands to the south of Bradley Avenue do not represent good planning nor reflect the Provincial Policy Statement 2024 encouraging the use of existing infrastructure and provision of a range of housing opportunities. The “squaring out” of the urban growth boundary as shown in red on the map below represents good planning and ensures cohesive growth in a manner that provides a range of housing types and development opportunities consistent with the Provincial Policy Statement, 2024.

We have described the properties proposed for inclusion in the urban growth boundary in more detail below.

[attached image]

Properties 1, 2, 3 and 4:

The two properties identified as 3700 Old Victoria Road and 2214 Wilton Grove Road are one contiguous block of land situated on the south side of Highway 401, north side of Wilton Grove Road and the east side of Old Victoria Road (approximately 136 acres of land).

The properties identified as 2034 / 2094 Wilton Grove Road are one contiguous block of land situated on the south side of Highway 401, north side of Wilton Grove Road, and the west side of Old Victoria Road (approximately 140 acres of land).

All these properties together provide approximately 276 acres of developable land. These properties are the largest landholding situated immediately to the south of Highway 401 and the existing urban growth boundary and abuts the Highway 401 and Veterans Memorial Parkway interchange.

These properties are situated immediately to the south of the Urban Growth Boundary just north of the Highway 401. There is significant development occurring in this area and ease of access to the Highway 401 corridor presents a unique opportunity for development potential. This area represents a natural progression of the Urban Growth Boundary that is situated immediately to the north and west of these properties.

[attached image]

Property 5

The properties identified as 2338 and 2350 Wilton Grove Road are one contiguous block of land situated to the south side of Highway 401, just east of Veterans Memorial Parkway. This property is located and one farm lot to the east of Veterans Memorial Parkway and Highway 401 interchange (approximately 50 acres of land). Again, these properties are situated immediately to the south of the existing urban growth boundary and have ease of access to the major transportation corridor via the Highway 401 and Veterans Memorial Parkway.

[attached image]

Property 6

The property identified as 1811 Wilton Grove Road is situated on the south side of Wilton Grove Road, mid-way between the Highbury Avenue and Veterans Memorial Avenue interchange providing access to Highway 401.

This property is located one farm lot east of the existing Maple Leaf Foods facility (approximately 50 acres of land) and uniquely situated to accommodate development opportunities.

[attached image]

Property 7

The property identified as 2471 Wilton Grove Rd London is situated on the south side of Wilton Grove Road, and mid-way between the Veteran's Memorial and Highway 401 interchange and the Westchester Borne and Highway 401 interchange. This property abuts the west side of the Mustang Drive-In (approximately 100 acres in area). Again, this property is situated immediately to the south of the urban growth boundary located to the north of Highway 401.

[attached image]

Property 8

The property identified as 2017 Bradley Avenue is situated on the north side of Highway 401, south side of Bradley Avenue, and mid-way between Highbury Avenue and Highway 401 interchange and Veterans Memorial Parkway and Highway 401 interchange (approximately 50 acres).

These lands should not be excluded from the proposed urban growth boundary expansion. The inclusions of these lands in the urban growth boundary represent a logical progression of growth given that inclusion of the lands on the north side of Bradley Avenue.

[attached image]

Summary

All these properties have easy access to the Highway 401 transportation corridor and due to their unique location should be properly included into the City of London's Urban Growth Boundary. We trust this information is of assistance and are available to respond to any questions or provide clarification.

Yours truly,

Siskinds LLP

[end of attached PDF]

Public Comment #5 – V. Jeffery

Received: July 16, 2025

Perhaps, I can add that I do not support this road being included in the urban development as that will force me to move, to keep my horses safe.

Public Comment #6 – V. Jeffery

Received: July 16, 2025

Thanks, for your response! I did attend a recent discussion of this proposal at City Hall and understand that development will not be quick due to the need to first build infrastructure, 5 to 10 years was mentioned as a minimum time frame. This does give me lots of time to revise my longterm plans...I am in my 60's and dreaming of riding to 100. If this development goes forward, I will simply have to accept my dream will not happen here, in the timber frame we built and love. However, I do understand that life is unpredictable and sometimes the unexpected and unwanted can actually lead to something good.

Public Comment #7 – J. and N. O'Brien

Received: July 16, 2025

Good afternoon

Please see attached our response to the data collection.

We have to say that it is so sad to see all of our farmland going to urban development. We know farmers who are bidding to get land for crops. It is too much for Lambeth - no schools or proper roads to accommodate the increase of people. The traffic is crazy and a child lost their life up the road because someone was in a hurry in traffic on Longwoods Road as Col Talbot was closed.

Where are we going to grow our food? Where are the children going to go to school? We have homeless people coming this way as they are being turned away in the city.

Enough is enough

I know you are only collecting the data so I apologize you have to read this.

Public Comment #8 – G. Reid

Phone Call: July 17, 2025

Landowner did not submit request however they noted a non supportive position regarding the Urban Growth Boundary Review and proposed expansion.

Public Comment #9 – E. Miles

Received: July 31, 2025

Attn: Scott Mathers,

The following comments are in response to the City of London's Draft Urban Growth Boundary (UGB) Review.

As new residential development is proposed and the population of London continues to grow, it is essential that adequate land be designated for new schools. Ensuring access to education is a fundamental element of building complete, vibrant, and livable communities.

We respectfully request that the City ensure that the Urban Growth Boundary review and subsequent land-use planning processes account for sufficient land to accommodate new school sites. In this regard, we want to ensure that enough land is available in the urban growth expansion areas to accommodate future school needs based on projected population growth, and that these lands are appropriately zoned and designated for elementary and secondary school uses.

Based on our needs, new elementary school sites should be 8 acres, and secondary school sites should be 12 acres to accommodate buildings, playfields, parking, and other facilities such as child-care centres. These needs must be anticipated early in the land-use planning process to avoid future challenges in securing appropriately sized and located parcels of land.

New elementary schools are generally 500 pupil places or larger. On average, a 1,600 unit mixed use development consisting of low and medium density residential types would yield approximately 500 students.

Thank you for your attention to this matter. We look forward to continued engagement as London plans for its future.

[end of attached PDF]

Public Comment #10 – K. Nunn

Received: August 11, 2025

RE: Preliminary Minimum Distance Separation Calculations Response Letter
1944 Bradley Avenue
City of London

Weston Consulting is the authorized planning consultant for Elite Bradley Development Inc. ("Elite Developments"), the owner of the lands municipally known as 1944 Bradley Avenue in the City of London (herein referred to as the "the subject lands"). Weston Consulting has been monitoring the City of London's Official Plan Review ("OPR") process on behalf of Elite Developments. The purpose of this letter is to provide formal comments on the Preliminary Minimum Distance Separation ("MDS") calculation mapping presented at the community information meeting held on May 20, 2025.

Background

The northern portion of the subject lands are located within the Urban Boundary and received Draft Plan of Subdivision approval for File 39T-23505 on May 16, 2024, subject to conditions of approval. A Complete Design Studies Submission was submitted to the City on May 5, 2025, and was deemed complete on May 9, 2025. The southern portion of the subject lands are currently located outside of the Urban Boundary. On behalf of Elite Developments, Weston Consulting has been actively monitoring and participating in the Land Needs Assessment ("LNA") process to request that the southern portion of the subject lands be considered for inclusion within the City's future Urban Growth Boundary ("UGB") as part of the OPR process. A Letter requesting inclusion of the subject lands within the UGB was most recently submitted on January 28, 2025.

Official Plan Review: Draft Urban Growth Boundary Community Growth

The draft UGB expansion mapping was released on May 14, 2025, and was presented at a community information meeting on May 20, 2025. The draft mapping represents a proposed expansion of 1,476 hectares for community growth and is intended for continued consultation. It is our understanding that a finalized UGB expansion recommendation will be presented to Council in forthcoming meetings.

Based on our review of the draft UGB expansion mapping, the southern portion of the subject lands are proposed to be included within the Urban Boundary Expansion as Community Growth areas. Also forming part of the materials presented at the community information meeting was mapping pertaining to Preliminary MDS calculations. It is our understanding that the MDS calculations were prepared as part of the assessment of agricultural impact to assess alternative directions for determining growth areas. Additionally, the City is accepting feedback on the MDS calculations to review and confirm the separation distances illustrated for the identified barns. This letter is in response to that request.

Based on our review of the MDS mapping, two livestock barn and manure facilities have been shown to have an impact on the subject lands: 1944 Bradley Avenue (the subject lands) and 1963 Bradley Avenue (adjacent lands); see Figure 1.

[attached image]

Minimum Distance Separation

Figure 1 identifies a 312 metre buffer has been applied around the existing barn located on the subject lands at 1944 Bradley Avenue. Through discussions with Elite Developments, it has been confirmed that there are currently no active livestock uses occurring on the subject lands. Furthermore, there is no intent to maintain the existing barn for livestock related purposes in the future as noted in Attachment 1 to this letter, which provides a tenant and owner declaration to the same. If the southern portion of the subject lands are brought into the Urban Boundary, it is the intention of the owner that the existing barn will be removed to facilitate Community uses which would allow for a logical and contiguous extension of the draft approved subdivision on the northern portion of the subject lands.

Regarding the adjacent lands at 1963 Bradley Avenue, we note that a portion of the 275 metre MDS buffer encroaches onto the southeast corner subject lands. This may pose potential constraints on the planned redevelopment. However, Attachment 2 to this letter is an owner declaration from 1963 Bradley Avenue indicating there is currently no active livestock uses occurring on the property and no intention to be used for said purpose in the future.

It is our understanding that the City is preparing to engage landowners and farm operators to confirm barn inventory and validate MDS calculations as part of the upcoming planning review process. We would appreciate being kept informed as new information becomes available regarding the status of 1963 Bradley Avenue. Considering that the livestock operations are no longer active we would be interested in exploring opportunities for a reduction or removal of the MDS buffers impacting this property.

Conclusion

We respectfully request that the comments contained herein be considered as part of the City of London OPR process. Weston Consulting requests notice of any future Public Meetings, Council Meetings, Staff Reports, draft Official Plan documents and/or decisions related to the OPR and reserves the right to provide further comments.

Thank you for the opportunity to provide this submission. Should you have any questions regarding this submission, please do not hesitate to contact the undersigned at extension 361.

Yours truly,
Weston Consulting
[attached image]

[attached image]

[end of attached PDF]

Public Comment #11 – S. Williamson

Received: August 14, 2025

Hi city of London planning friends

My name is Sara Williamson, I'm a 35 year resident of London who owns a property in Woodfield and works for a longtime tech company in the city's core.

I have always been a believer in supporting our city's culture and community by promoting and attending downtown events for the arts, doing my shopping downtown, participating in city feedback opportunities and more.

It brings me no joy to write this email today. But when I learned about counsels Urban Growth Boundary proposal I was compelled to reach out immediately. How could counsel consider this in any way positive for our community? Do they dream of becoming the next Brampton Ontario? Ew!

I'm deeply saddened when thinking about how much investment these new suburban sprawls have received, while our beautiful, historic downtown is neglected in so many ways.

Let's build up and invest in our core. Better services, an actual grocery chain, full storefronts! People want to move to a city with strong culture and values. They want to be proud of where they're from. Gas guzzling shopping centers and overpriced matching subdivisions are the antithesis of city spirit.   

Please reply and let me know if there is any other way I can contribute to this conversation.

Thank you in advance.

Public Comment #12 – P. Lombardi

Received: August 21, 2025

We are legal counsel to Mt. Elgin Dairy Farms Ltd., London Dairy Farms Ltd., Sequin / Farhi Holdings Corporation (collectively the "Clients"). Our Clients' own, operate and control a significant number of landholdings that provide opportunities for the City's growth through the expansion of the City of London's urban growth boundary. This letter is being submitted in advance of the public meeting scheduled for Wednesday, September 3, 2025, to reiterate our Clients' request that their lands listed below be included in the City's urban growth boundary (collectively referred to as the "Subject Properties").

1. 3700 Old Victoria Rd London ON N6N 1R2
2. 2214 Wilton Grove Rd London ON N6N 1M7
3. 2034 Wilton Grove Rd London ON N6N 1M8
4. 2094 Wilton Grove Rd London ON N6N 1M8
5. 2338 and 2350 Wilton Grove Rd London ON N6N 1M6
6. 1811 Wilton Grove Rd London ON N6N 1M5
7. 2471 Wilton Grove Rd London ON N6N 1M8
8. 2017 Bradley Avenue, London, ON N6M 1E4

The location of the Subject Properties provides the City with a unique opportunity to expand its Urban Growth Boundaries to include all these lands within the City's Urban Growth Boundary. The Subject Properties provide easy and convenient access to the Highway 401 transportation corridor and are situated just outside of the existing urban growth boundary.

All the Subject Properties have easy access to the Highway 401 transportation corridor with one property being situated on the south side of Bradley Avenue; and the remaining properties being situated on the north or south side of Wilton Grove Road. The Subject Properties are all situated to the east of Highbury Avenue and to the west of Highway 74 (Westchester Borne).

The inclusion of the Subject Properties within the urban grown boundary provides the City with an opportunity to include a significant tract of land to facilitate development in the area that proceeds in a comprehensive manner, on lands situated within close proximity to significant transportation corridors, represents good planning and is in the public interest.

Our Client would like to further discuss this matter with the City at your earliest convenience.

Yours truly,
Siskinds LLP

Paula Lombardi
Partner

Summary of Comments – Development Interest Group Meeting, June 25, 2025 Process

- Notice of PPM noted appeals process, is this appealable?
- Clarifications requested related to Natural Heritage System and buffer methodology for 20m and 30m approaches.
- There is an affordability and housing crisis and opportunity for lower costs through “end of pipe” connections. How do we create a system to focus on short term wins without a cumbersome process?
- Concern that City has not previously undertaken a land supply review until the current LNA and UGB Review process.

Consultation

- The CSPI is ineffective due to size, LDI membership interested in a smaller working group to focus on implementation for key properties in the 10-year planning horizon.
- Is the industrial side of the review having a separate consultation similar to the Community Growth portion?
- Where will the decision point be related to First Nations concerns heard in letter to June 23, 2025 PEC?
- Concerns voiced regarding landowner opposition noting that ownership changes over time and planning horizon is long term.

Urban Growth Boundary Expansion

- Clarification requested related to Place Type designation for expansion lands
- Concern related to the secondary plan or area plan process. Has the City considered the scope and magnitude of the process?
- Concern related to scoping to ensure expedition of process for expansion areas. Note that schools, stormwater management, street connectors, and community facilities as factors requiring collaboration between development industry and local government.

- Existing Urban Growth Boundary feels arbitrary to meet expansion requirements rather than following property lines. Concern that expansion will repeat this.

Summary of Comments – Community Information Meeting, September 3, 2025

General Discussion

- Do we expect the Urban Growth Boundary expansion to expedite development?
- Will site specific evaluations be made publicly available?
- Is there an industrial strategy to attract large-scale industry?
- Clarification related to the difference between the Development Charges Background Study and the Urban Growth Boundary Review.
- Why would someone approach the City to request lands for inclusion in the Urban Growth Boundary?
- Will revised EMG-based buffers be forwarded to Planning staff for site specific reviews following approval of expansion?
- Clarification requested related to feature-based buffers.

Ministry of Finance Ontario Population Projections

- Will a revised Urban Growth Boundary expansion be prepared using the latest Ministry of Finance population projections?
- Is the impact on industrial land need related to a decline in employment projections tied to population trends?
- Concern related to global population trends and lasting impact of return-to-office mandates impacting urban growth.
- Why does the City need to use the Ministry of Finance population projections?
- City should advocate for different source of growth projections other than the Ministry of Finance.

Results of Industrial Evaluation for Expansion

- Landowner not included within proposed expansion expressed concern related to their ability to develop their lands.
- Questions raised regarding the strategic location of Highway 401/402 and other locations for industrial location.
- Did the City consider or put additional weight on situations where properties are bisected by the existing Urban Growth Boundary?

Land Needs Assessment Methodology

- If the Land Needs Assessment process is being updated every 5 years is there an option for Council to add or remove land from the boundary based on demands related to subsequent Ministry of Finance population projection releases?
- Clarification requested related to the allocation of land for new school blocks within expansion areas citing new housing units over the next 30-year planning horizon.
- Are brownfield sites considered within the land supply inventory?
- Have industrial land needs adjusted over time, for example, due to increased automation?

Urban Growth Boundary Review Methodology

- Why is the former “Southside” wastewater treatment plant being shown if it is not supported? Is there updated costing available for this option?
- How much industrial land does the City of London currently own and does the City own any of the proposed industrial expansion lands?
- Clarification related to whether ecological studies would be required noting that developable land calculations consider Environmental Management Guidelines.
- Does the evaluation and review process consider loss of food production or the lands ability to feed the increased population?

- How much weight does the availability of servicing hold in the evaluation of lands for expansion?
- What is the purpose of completing the Minimum Distance Separation calculations if they buffer no longer applies when the lands are brought inside the boundary?
- Do we still have vacant land available from the last urban expansion?
- Why would Minimum Distance Separation be applied to industrial properties?
- How much land will be designated Neighbourhoods vs other place types?
- Can the background information related to future school needs provided by the local school boards be shared?

Privately Initiated Applications for Expansion

- Is there precedence for the private expansion request process? Are other municipalities also undertaking this process?

Summary of Comments – Development Interest Group Meeting, September 5, 2025

General Discussion

- Minister's Zoning Order (MZO) for the lands at 4423 Highbury Avenue South are included within the proposed 88 ha of industrial expansion?
- Confirming size of proposed expansion in Southeast (North of Bradley Ave and East of Old Victoria Rd).
- Commentary regarding the Housing Needs Assessment and how to match housing growth versus population growth.
- Changes in Bill 17 related to complete application requirements and Ministry's approval authority.

Ministry of Finance Ontario Population Projections

- Seeking confirmation of whether Staff report will recommend MOF 2024 or MOF 2025.
- Confirming whether City's intention is to revisit the Land Needs Assessment (LNA) with every MOF annual population projection updates?
- Question of how MOF 2025 vs MOF 2024 population decrease compares to similar population shifts in other Ministry of Finance population projection releases.

Land Needs Assessment Methodology

- Question regarding process to discount lands from the non-industrial expansion, if Council direction is to revise Land Needs Assessment to use 2025 MOF.

Urban Growth Boundary Review Methodology

- Is there public access to Staff evaluation results of lands by block area?
- Clarification related to place type for all areas for potential non-industrial expansion.
- Clarification related to the future Community Growth (CG) place types and differences between Secondary Plans and other area planning work.
- Clarification on the evaluation criteria to determine the recommended Place Types for lands to be brought into UGB, including location, infrastructure proximity and size.
- Clarification requested regarding the future CG place type designation and potential implications for landowners.
- Question regarding timing of neighbourhood/area plans.
- Question whether phasing policies are part of area plans.
- Request to access revised draft UGB mapping once available.
- Clarification on discounting floodline or the regulated flood area from developable land inventory.

Privately Initiated Applications for Expansion

- Request to access City's mapping shapefiles, as part of potential privately initiated applications.

Appendix L – List of Landowner Requests

Landowner requests for evaluation (including Community Growth and Employment Area), received as of August 15, 2025:

Property ID	Municipal Address	Applicant
P001	1620 Fanshawe Park Rd E	Orange Rock Developments
P002	7290 Pack Rd	INCON
P002	7220 Pack Rd (proposed)	INCON
P002	7184 Pack Rd (proposed)	INCON
P002	3323 Colonel Talbot Rd	INCON
P002	3293 Colonel Talbot Rd	INCON
P002	3231 Colonel Talbot Rd (proposed)	INCON
P003	2425 Old Victoria Rd	Adam Hiemstra
P004	1431 Sunningdale Rd E	Ali Jomaa
P005	2012 Oxford St W	Orange Rock Developments
P006	1871 Bradley Ave (north of hydro corridor)	Alex Sumner
P006	1913 Bradley Ave	Alex Sumner
P006	1871 Bradley Ave (south of hydro corridor)	Alex Sumner
P007	1944 Bradley Ave	Elite Bradley Development Inc
P008	1996 Bradley Ave	Weston Consulting
P009	2700 Trafalgar St	Stantec
P010	3681 Homewood Lane	Angelo and Brenda Fortese
P011	3950 Dundas St (Thames Centre, Middlesex)*	Dale Sports Ltd. (Golf North Properties)
P012	4423 Highbury Ave S	Dancor Consultation Ltd
P013	2679 Dundas St	Farhi Holding Corporation
P013	2613 Dundas St	Farhi Holding Corporation
P014	1795 Clarke Rd	Farhi Holding Corporation
P014	1885 Fanshawe Park Rd E	Farhi Holding Corporation
P014	2106 Fanshawe Park Rd E	Farhi Holding Corporation
P015	1739 Sunningdale Rd W (west of park corridor)	MHBC
P015	1739 Sunningdale Rd W (east of park corridor)	MHBC
P016	1959 Commissioners Rd E	MHBC
P016	1983 Commissioners Rd E	MHBC
P016	1811 Commissioners Rd E	MHBC
P016	2003 Commissioners Rd E	MHBC
P016	2031 Commissioners Rd E	MHBC
P017	1701 Fanshawe Park Rd W	Zelinka Priamo Ltd
P018	360 Crumlin Sdrd	Gray Angel Holdings Inc
P020	2049 Bradley Ave (south of hydro corridor)	2035723 Ontario Limited
P020	2049 Bradley Ave (north of hydro corridor)	2035723 Ontario Limited
P021	1741 Wilton Grove Rd	Amandeep Bajwa
P022	3565 Westdel Brne	Antonio Bagnara
P023	1806 Wilton Grove Rd	Tom Grieve
P023	1874 Wilton Grove Rd	Tom Grieve
P024	2329 Dingman Dr	Gray Angel Holdings Inc
P025	2387 Dingman Dr	Brian and Mel Murray
P026	2135 Dingman Dr	Woodhurst Farm Ltd
P026	2251 Dingman Dr	Woodhurst Farm Ltd

Property ID	Municipal Address	Applicant
P027	2329 Wonderland Rd N	Corlon Properties Inc
P028	2497 Dingman Dr	Barbara Comfort
P029	1731 Fanshawe Park Rd W	1000357055 ONTARIO INC (Mina Abdel Sayed)
P030	2543 Wickerson Rd	Franco and Annette Bortolussi
P031	2624 Jackson Rd	Drewlo Holdings
P032	2017 Bradley Ave	Farhi Holding Corporation
P032	2017 Bradley Ave	Farhi Holding Corporation
P033	4380 Murray Rd	Farhi Holding Corporation
P033	4410 Murray Rd (proposed)	Farhi Holding Corporation
P033	4638 Murray Rd	Farhi Holding Corporation
P033	4557 Colonel Talbot Rd	Farhi Holding Corporation
P033	4740 Murray Rd	Farhi Holding Corporation
P033	4798 Murray Rd	Farhi Holding Corporation
P033	4956 Murray Rd	Farhi Holding Corporation
P033	7673 Westminster Dr	Farhi Holding Corporation
P033	7541 Westminster Dr	Farhi Holding Corporation
P033	5315 Colonel Talbot Rd	Farhi Holding Corporation
P033	5246 Cook Rd (proposed)	Farhi Holding Corporation
P033	5619 Colonel Talbot Rd	Farhi Holding Corporation
P034	8156 Longwoods Rd	Farhi Holding Corporation
P035	2465 Westminster Dr	Westminster Trails Inc
P036	1962 Oxford St W	Westdell Development Corp
P037	2440 Westminster Dr	Franco Ditrolio
P038	120 Gideon Dr	Abdel Rahman Lawendy
P039	Roll No - 090460137550000 (Fanshawe Park Rd W)	Mor Holding (London) Corporation
P040	4866 Wellington Rd S	Hisham Badawi
P040	3618 Westminster Dr	Hisham Badawi
P040	3386 Westminster Dr	Hisham Badawi
P041	1697 Byron Baseline Rd	William L. Derks and Henny P. Derks
P042	5369 Wellington Rd S	Nathan Caranci (Farhi Holding Corporation)
P042	3298 Scotland Dr	Nathan Caranci (Farhi Holding Corporation)
P042	5371 Wellington Rd S	Nathan Caranci (Farhi Holding Corporation)
P042	3287 Westminster Dr (proposed)	Nathan Caranci (Farhi Holding Corporation)
P043	1811 Wilton Grove Rd	Tommy Faulkner
P043	2471 Wilton Grove Rd	Tommy Faulkner
P043	2350 Wilton Grove Rd	Tommy Faulkner
P043	2034 Wilton Grove Rd	Tommy Faulkner
P043	2094 Wilton Grove Rd (proposed)	Tommy Faulkner
P043	3700 Old Victoria Rd	Tommy Faulkner
P043	2338 Wilton Grove Rd	Tommy Faulkner
P044	754 Westminster Dr*	Tommy Faulkner
P045	2448 Dundas St E	Westdell Development Corp
P046	2001 Sunningdale Rd W	Westdell Development Corp
P047	2093 Commissioners Rd E	Westdell Development Corp
P048	1217 Gainsborough Rd	Auburn Developments
P048	1557 Fanshawe Park Rd W	Auburn Developments
P048	1525 Fanshawe Park Rd W	Auburn Developments
P048	1720 Sunningdale Rd W	Auburn Developments

Property ID	Municipal Address	Applicant
P048	1185 Sunningdale Rd W	Auburn Developments
P049	1380 Gainsborough Rd (south of rail corridor)	Southside Group of Companies
P049	1440 Gainsborough Rd	Southside Group of Companies
P049	1380 Gainsborough Rd (north of rail corridor)	Southside Group of Companies
P049	1269 Gainsborough Rd	Southside Group of Companies
P049	1992 Fanshawe Park Rd W	Southside Group of Companies
P050	2535 Westdel Brne	Southside Group of Companies
P051	1017 Sunningdale Rd W	Issam Thabit
P052	4680 Wellington Rd S	761030 Ontario Ltd.
P053	2556 Wilton Grove Rd	Nathan Caranci
P054	2774 Dingman Dr	Gurwinder Mangat
P054	2816 Dingman Dr	Gurwinder Mangat
P054	1803 Bradley Ave (north of hydro corridor)	Gurwinder Mangat
P054	1803 Bradley Ave (south of hydro corridor)	Gurwinder Mangat
P054	3575 Dingman Dr	Gurwinder Mangat
P055	1753 Fanshawe Park Rd W	Costantinos Ioannidis
P056	2728 Dingman Dr	SSP Group
P057	1185 Southdale Rd W	Lecram Inc.
P058	1316 Gainsborough Rd	Bellamere Developments Inc
P059	2140 Sunningdale Rd W	West Maple Lynch Farms & 2725237 Ontario Inc.
P059	1950 Sunningdale Rd W	West Maple Lynch Farms & 2725237 Ontario Inc.
P060	2426 Wickerson Rd	Kape Developments Ltd.
P061	9120 Elviage Dr	Bill and Tonya Groenewegen
P061	9070 Elviage Dr	Bill and Tonya Groenewegen
P061	9150 Elviage Dr	Bill and Tonya Groenewegen
P062	1007 Sunningdale Rd W	Karim Kouta
P063	7511 Longwoods Rd	Patzer Homes Inc.
P064	1420 Tote Rd	2158508 Ontario Ltd. & Provo Leasing Inc.
P064	1342 Tote Rd	2158508 Ontario Ltd. & Provo Leasing Inc.
P065	5044 Wellington Rd S	David Chromczak
P066	2690 Westminster Dr	761030 Ontario Ltd.
P067	1682 Byron Baseline Rd	Sifton Properties Limited
P067	2420 Westdel Brne	Sifton Properties Limited
P068	2166 Oxford St W	Sifton Properties Limited
P069	1896 Sunningdale Rd E	Sifton Properties Limited
P070	1976 Oxford St W	Sifton Properties Limited
P071	2270 Highbury Ave N	Sifton Properties Limited
P071	2380 Highbury Ave N	Sifton Properties Limited
P072	2197 Westdel Brne	York Developments
P072	2133 Westdel Brne	York Developments
P073	4570 Westminster Dr	Reid Crinklaw
P073	4570 Westminster Dr	Reid Crinklaw
P074	6295 Westminster Dr	Mark and Carol Crinklaw
P074	6134 Westminster Dr (proposed) (south of hydro corridor)	Mark and Carol Crinklaw
P074	6134 Westminster Dr (proposed) (north of hydro corridor)	Mark and Carol Crinklaw

Property ID	Municipal Address	Applicant
P075	7056 Pack Rd	Old Oak Properties Inc.
P075	7086 Pack Rd	Old Oak Properties Inc.
P075	3133 Colonel Talbot Rd	Old Oak Properties Inc.
P075	3087 Colonel Talbot Rd	Old Oak Properties Inc.
P075	1029 Southdale Rd W	Old Oak Properties Inc.
P076	3303 Westdel Brne	Tricar Properties
P076	3219 Westdel Brne	Tricar Properties
P077	9298 Elviage Dr	Steve Plunkett
P077	9258 Elviage Dr	Steve Plunkett
P077	9246 Elviage Dr	Steve Plunkett
P077	9282 Elviage Dr	Steve Plunkett
P077	9220 Elviage Dr	Steve Plunkett
P077	1435 Tote Rd	Steve Plunkett
P078	1424 Southdale Rd W	Mike Meddaoui
P079	3101 Westdel Brne	Brendan Ryan
P080	9320 Elviage Dr	Dean Soufan
P081	774 Crumlin Sdrd	New London Group
P082	4763 Colonel Talbot Rd	Joe Fortese
P083	3708 Homewood Lane	2445727 Ontario Inc
P083	7451 Pack Rd	Therese Hibbs
P084	21497 Wonderland Rd N (Middlesex Centre)*	Peter Stavrou
P085	1035 Sunningdale Rd W	Irwin Zaifman
P086	4563 White Oak Rd	White Oak Developments Inc.
P087	2396 Wilton Grove Rd	1000003058 ONTARIO INC
P088	6831 Wonderland Rd S	1068788 Ont Ltd
P089	6304 Glanworth Dr	1068788 Ont Ltd
P089	6304 Glanworth Dr	1068788 Ont Ltd
P090	4040 Southminster Brne	Jeff Ferguson / John Ferguson / 1068788 Ont Ltd
P091	6333 Glanworth Dr	1068878 Ont Ltd
P092	6421 Wellington Rd S	Jeff Ferguson / John Ferguson
P093	6249 Glanworth Dr (proposed)	Jeff Ferguson / John Ferguson / Joanne Ferguson
P093	6567 Wonderland Rd S	Jeff Ferguson / John Ferguson / Joanne Ferguson
P094	6929 Wonderland Rd S	Jeff Ferguson / John Ferguson / Joanne Ferguson
P095	6926 Colonel Talbot Rd	1068788 Ont Ltd
P096	7031 Littlewoods Dr	Jeff Ferguson / John Ferguson / Joanne Ferguson
P097	6597 Wellington Rd S	Jeff Ferguson / John Ferguson / Joanne Ferguson
P097	6601 Wellington Rd S	Jeff Ferguson / John Ferguson / Joanne Ferguson
P097	3540 Granworth Dr	Jeff Ferguson / John Ferguson / Joanne Ferguson
P097	3476 Granworth Dr	Jeff Ferguson / John Ferguson / Joanne Ferguson
P098	488 Crumlin Sdrd	John Brun
P099	4236 Westminister Dr	Eric Thompson
P100	3345 Gore Rd	Alexandra Lam
P101	1431 Gainsborough Rd	1342964 Ontario Inc. & DeKay Holdings Ltd.
P101	1445 Gainsborough Rd	1342964 Ontario Inc. & DeKay Holdings Ltd.

Property ID	Municipal Address	Applicant
P102	3050 Trafalgar St	Scott McLaren
P103	3405 Dingman Dr	Jug Manocha
P103	3356 Westminster Dr (proposed)	Jug Manocha
P103	3226 Westminster Dr	Jug Manocha
P104	3085 Trafalgar St	Betty Jean O'Reilly & Suzanne McLaren
P105	2643 Old Victoria Rd	Old Victoria Road Community Association
P105	2617 Old Victoria Rd	Old Victoria Road Community Association
P105	2597 Old Victoria Rd	Old Victoria Road Community Association
P105	2539 Old Victoria Rd	Old Victoria Road Community Association
P105	2493 Old Victoria Rd	Old Victoria Road Community Association
P105	2459 Old Victoria Rd	Old Victoria Road Community Association
P106	610 Crumlin Sdrd	Joe and Aldina Demelo
P107	1857 Fanshawe Park Rd W	Robert Hewitt
P108	2316 Wilton Grove Rd	940 On The Park Limited
P109	1241 Staffordshire Pl	2658049 Ontario Inc.
P110	706 Crumlin Sdrd	Victor Da Silva
P111	3023 Westdel Brne	Mike Meddaoui
P112	2538 & 2760 Sunningdale Rd E	Amrize Canada Inc.
P112	2400 Sunningdale Rd E	Amrize Canada Inc.
P112	2325 Sunningdale Rd E	Amrize Canada Inc.
P112	1788 Clarke Rd	Amrize Canada Inc.
P112	1865 Clarke Rd	Amrize Canada Inc.
P113	2359 Westminster Dr	Yovanny Marin-Ariza
P114	3699 Dingman Dr	Victor Danylchenko

*Applicant notified that annexations are provincial jurisdiction and are not contemplated within the context of a potential Urban Growth Boundary expansion.

Appendix M – 2025 Ministry of Finance Update

1.0 Ministry of Finance – Ontario Population Projection Update

1.1 Population Growth Projections

The Ministry of Finance projections provide updated population estimates for the years between 2024 and 2051. Based on the patterns identified in the Ministry's dataset, the population forecast is further imputed to the expanded period ending 2054 for the 30-year planning horizon starting from 2024. From 2030 to 2051, the Middlesex County population growth rate decreases somewhat annually. It is assumed that the downward trend would continue to 2054 when London is projected to reach a population of 710,600.

Table M-1 below shows projected population growth for each 5-year period in the 2024 and 2025 projection datasets.

Year	Population – 2024 MoF	Population – 2025 MoF	Change between 2024 and 2025
2024	497,200	486,000	(11,200)
2029	534,000	510,000	(24,000)
2034	580,400	549,400	(31,000)
2039	626,600	588,600	(38,000)
2044	673,400	628,500	(44,900)
2049	721,100	669,100	(52,000)
2054	770,100	710,600	(59,500)
Total Growth (2024-2054)	272,900	224,600	(48,300)
Average Annual Growth	9,100	7,500	(1,600)
Average Annual Growth Rate	1.5%	1.3%	(0.2%)

Table M-1. Population Growth Forecasts (2024-2054)

1.2 Housing Units

To convert the Ministry of Finance population projections released in 2025 to the City's housing demand in the 30-year planning horizon, the persons per unit (PPU) assumptions, updated by Watson & Associates Economists Ltd in October 2024, were applied. Assuming an average PPU of 2.53 over the 2024 to 2054 period, the City's permanent households are forecast to increase from 191,320 to 288,860, growing at a rate of 1.4% annually.

Table M-2, below, shows projected household growth in the 2024 and 2025 projection datasets.

Year	Housing Units – 2024 MOF	Housing Units – 2025 MOF	Change between 2024 and 2025
2024	195,760	191,320	(4,440)
2029	209,430	200,010	(9,410)
2034	226,730	214,630	(12,110)
2039	245,740	230,810	(14,930)
2044	265,110	247,430	(17,680)
2049	288,460	267,650	(20,810)
2054	313,030	288,860	(24,170)
Total Growth (2024-2054)	117,270	97,540	(19,730)
Average Annual Growth	3,910	3,250	(660)
Average Annual Growth Rate	1.6%	1.4%	(0.2%)

Table M-2. Housing Growth Forecasts (2024-2054)

1.3 Land Demand - Summary

Below is a table summarizing the growth projection demand by greenfield land area for the 30-year planning horizons utilizing the 2024 and 2025 population projection datasets:

Land Use Category	Greenfield Demand (ha) – 2024 MOF	Greenfield Demand (ha) – 2025 MOF	Change between 2024 and 2025
Residential – Low Density	1,974	1,640	(334)
Residential – Medium Density	502	418	(84)
Residential – High Density	113	94	(19)
Institutional	112	94	(18)
Commercial	51	43	(8)
Industrial	664	532	(132)

Table M-3. Summary of City of London's Residential and Non-Residential Land Demand

1.4 Resulting Land Supply

a. Residential

At the end of the 30-year planning horizon, there is a deficit of 1,017 hectares for LDR which includes the SWM factor, and 37 hectares discounted for future school blocks, and a land surplus of 16 hectares for MDR, as well as a land surplus of 114 hectares for HDR developments, as indicated in Table M-4.

There is an identified need for additional residential lands by 2054.

Structure Type	Greenfield Units Supply	Greenfield Land (ha) remaining by 2054 – 2024 MOF	Greenfield Land (ha) remaining by 2054 – 2025 MOF
LDR	10,589	(1,366)	(1,017)
MDR	19,631	(73)	16
HDR	26,586	94	114
School Blocks	-	(37)	(37)

Table M-4. Residential Greenfield Land Needs

b. Commercial

There is a continued expectation that most of the commercial demand will be absorbed into mixed-use development rather than standalone commercial uses. Calculations of commercial lands include the Commercial Industrial Place Type of The London Plan, consistent with the new *PPS* definition related to Employment Lands. At the end of the 30-year planning horizon, there will be remaining a balance of 16 hectares of lands to accommodate commercial growth.

There is **no** identified need for additional commercial lands by 2054.

c. Institutional

The high intensification rate applied to the land calculation is representative of development trends and has resulted in much of the demand being accommodated within the Built Area. As such, at the end of the 30-year planning horizon there will be a remaining balance of 32 hectares of land to accommodate institutional growth.

There is **no** identified need for additional institutional lands by 2054.

d. Industrial

The lower population projection from the 2025 MOF dataset reduces the employment projections related to demand for industrial land consumption. As such, at the end of the 30-year planning horizon there will be a remaining balance of 43 hectares of land to accommodate industrial growth.

There is **no** identified need for additional institutional lands by 2054.

The table below summarizes the non-residential greenfield land needs based on a 30-year planning horizon.

Sector	Greenfield Land Supply (ha)	Greenfield Land (ha) remaining by 2054 – 2024 MOF	Greenfield Land (ha) remaining by 2054 – 2025 MOF
Commercial	62	8	16
Institutional	130	13	32
Industrial	575	(88)	43

Table M-5. Non-residential Greenfield Land Needs

Detailed Land Demand and Supply Resulting from the 2025 Ontario Population Projection

1.5 Residential Overall Demand

Tables M-6 and M-7 summarize the 5-year and annual housing demand forecast by structure type over the 2024 to 2054 period. The overall new housing development is expected to comprise 27% LDR, 28% MDR and 45% HDR units.

5-Year Period	LDR	MDR	HDR	Total
2024-2029	2,410	2,420	3,860	8,690
2030-2034	4,040	4,080	6,500	14,620
2035-2039	4,470	4,520	7,200	16,190
2040-2044	4,590	4,640	7,390	16,620
2045-2049	5,580	5,640	8,990	20,210
2050-2054	5,860	5,920	9,430	21,210
Total (2024-2054)	26,950	27,220	43,370	97,540

Table M-6. 5-Year Housing Demand by Structure Type (2024-2054)

5-Year Period	LDR	MDR	HDR	Total
2024-2029	480	480	770	1,730
2030-2034	810	820	1,300	2,930
2035-2039	890	900	1,440	3,230
2040-2044	920	930	1,480	3,330
2045-2049	1,120	1,130	1,800	4,050
2050-2054	1,170	1,180	1,890	4,240
Total (2024-2054)	900	910	1,450	3,250

Table M-7. Annual Housing Demand by Structure Type (2024-2054)

To achieve the 45% intensification target over the 2024-2054 period, approximately 43,890 units will need to be constructed within the BAB, averaging 1,460 units per year as shown in Table M-8. The portion of units inside the BAB will be 5% LDR, 23% MDR and 72% HDR units. The annual average of 72% of HDR units is expected to continue over the 30-year horizon. Roughly 150 out of 26,950 LDR units are expected to be in rural area over 2024 and 2054, averaging 5 units per year.

Number of Units	LDR	MDR	HDR	Total
Built Area Units	2,200	10,090	31,600	43,890
Greenfield Units	24,610	17,120	11,770	53,500
Total	26,810	27,210	43,370	97,390

Table M-8. Built Area and Greenfield Housing Growth Forecast based on 45% Intensification Scenario (2024-2054)

1.6 Residential Greenfield Demand

The City of London is expected to require approximately 2,152 hectares of greenfield lands to accommodate 53,500 units over 2024 to 2054 period, as shown in Table M-9. The calculated requirement is based on the assumptions noted above and contemplate The London Plan intensification target of 45%. The land requirements shown in Table M-9 do not include stormwater management facilities, school blocks, nor any buffering required adjacent to natural features.

5-Year Period	Greenfield Units	Greenfield Lands Required (ha)
Low Density Residential	-	-
2024-2029	2,190	146
2030-2034	3,690	246
2035-2039	4,080	272
2040-2044	4,190	280
2045-2049	5,110	340
2050-2054	5,350	357
Total (2024-2054)	24,610	1,641
Medium Density Residential	-	-
2024-2029	1,520	37
2030-2034	2,560	62
2035-2039	2,840	69
2040-2044	2,920	71
2045-2049	3,550	87
2050-2054	3,730	91
Total (2024-2054)	17,120	417
High Density Residential	-	-
2024-2029	1,050	8
2030-2034	1,760	14
2035-2039	1,950	16
2040-2044	2,010	16
2045-2049	2,440	20
2050-2054	2,560	20
Total (2024-2054)	11,770	94
Grand Total	53,500	2,152

Table M-9. Greenfield Residential Demand and Land Requirements (2024-2054)

1.7 Residential Greenfield Supply

A summary of the residential inventory, based on the status of the land (registered plan, draft approved plan, designated residential, urban reserve community growth) presented in the Land Needs Assessment report dated December 2024, has been provided below (see Table M-10).

Category	LDR Units	MDR Units	HDR Units	Total Units
Registered Subdivision, Condominium and Reference Plans	1,375	2,055	1,089	4,519
Draft Approved Subdivision and Condominium Plans	1,494	3,691	3,519	8,704
Draft Subdivision and Condominiums Plans Under Review	1,227	6,123	3,479	10,829
Site Plans	0	2,717	2,709	5,426
Potential Development	109	579	968	1,656
Official Plan Designations	6,384	3,466	14,822	24,672
Total	10,589	18,631	26,586	55,806

Table M-10. Adjusted Residential Vacant Land Inventory as of September 30, 2024

1.8 Greenfield Residential Lands Analysis

Future residential land needs were determined by evaluating the ability of greenfield lands to accommodate projected demand for residential land over the planning horizon. The total supply of residential minus the projected residential demand yields a surplus of 2,310 greenfield units at the end of the 30-year planning period (2054). For the purposes of this planning exercise, the residential greenfield lands were categorized by structure type to ensure adequate supply based on market demands.

Prior to supply deductions from development industry feedback, there is sufficient land at the end of the planning period to accommodate approximately 17,120 MDR units and 11,770 HDR units with a shortage of land available to accommodate the projected LDR development. Demand calculations contemplated a 5% land requirement for stormwater management facilities and a 50% reduction to the 150 UPH residential value for the Shopping Area Place Type. An additional 37.3 hectares (92.2 acres) was discounted from the residential supply for school blocks based on capital planning needs provided by the two major local school boards. The final calculation indicates there is a surplus of 16 hectares of lands for MDR units and a surplus of 114 hectares of lands for HDR units but a deficit of 1,054 hectares of lands to accommodate LDR units as well as school blocks. Table M-11 shows available land supply broken down by structure type.

Structure Type	Greenfield Unit Supply	Greenfield Unit Demand	Greenfield Units remaining in 2054	Greenfield Land (ha) remaining in 2054
LDR	10,590	24,610	(14,020)	(1,017)
MDR	18,630	17,120	1,510	16
HDR	26,590	11,770	14,820	114
School Block	-	-	-	(37)

Table M-11. Residential Greenfield Land Needs (2024-2054)

1.9 Commercial Growth Forecasts

The growth forecast for the commercial sector represents a combined calculation of future office and retail needs, as shown in table M-12 below.

5-Year Period	Employment Growth	COVID-19 Job Loss Recovery – Allocated	Annual Growth Rate
2024-2029	12,950 (18,470)*	5,520	3.2%
2030-2034	7,790	-	1.6%
2035-2039	7,910	-	1.5%
2040-2044	7,880	-	1.4%
2045-2049	7,990	-	1.3%
2050-2054	8,320		1.3%
Total (2024-2054)	52,840	-	1.7%

Table M-12. Commercial Growth Forecasts (2024-2054)

* Inclusive of employment loss recovery

1.10 Institutional Growth Forecasts

The institutional sector anticipates moderate growth over the 30-year planning horizon and is projected to grow from roughly 53,810 to 97,350 total employees. Employment growth and the annual growth rate are noted in Table M-13. It should be noted that GFA creation within the institutional sector does not traditionally follow a linear annual growth, and large-scale projects will often lag behind population-based demands due to external funding mechanisms and decision-making processes.

5-Year Period	Employment Growth	Annual Growth Rate
2024-2029	5,760	1.8%
2030-2034	5,650	1.6%
2035-2039	5,470	1.4%
2040-2044	5,410	1.3%
2045-2049	5,570	1.3%
2050-2054	5,680	1.2%
Total (2024-2054)	33,540	1.4%

Table M-13. Institutional Growth Forecasts (2024-2054)

1.11 Commercial and Institutional Greenfield Demand

The commercial sector is projected to experience strong GFA demands to service population growth. The sector is projecting an average of 60,540m² of development annually over the 30-year planning horizon. This growth rate is expected to result in approximately 1,816,260m² of new GFA to be developed over the 30-year forecast. Despite this strong growth, it is expected that 13% of commercial demand will be accommodated through standalone commercial whereas the remaining balance will be incorporated into mixed-use development. It is anticipated that 333 hectares of commercial land will be required, with 43 hectares of greenfield land required when factoring in the assumed 45% intensification rate and the 13% share for standalone commercial demand.

Over the 30-year planning horizon, the institutional sector is projecting GFA growth with an average of 72,720m² of development annually. This growth rate is expected to result in approximately 2,181,440m² of new GFA to be developed over the 30-year forecast. It is anticipated that 519 hectares of institutional land will be required, with 94 hectares of greenfield land required when factoring in the assumed 82% intensification rate. Table M-14 summarizes the assumptions related to GFA calculations for commercial and institutional land use. Table M-15 summarizes the demands for the commercial and institutional sectors.

Sector	Floor Space per Worker Assumption	Floor Area Ratio (FAR) Assumption	GFA Required (m ²)
Commercial	34m ² (370ft ²)	0.30	1,816,260m ²
Institutional	65m ² (700ft ²)	0.42	2,181,440m ²

Table M-14. Commercial and Institutional GFA calculations (2024-2054)

Sector	Total Land Required (m²)	Total Land Required (ha)	Greenfield Required (ha)
Commercial (total)	6,054,200	605	333
Commercial (standalone)	787,050	79	43
Institutional	5,193,900	519	94

Table M-15. Commercial and Institutional Greenfield Demand

1.12 Commercial and Institutional Land Supply

The commercial and institutional inventory was categorized by land status (registered plan, draft approved plan, designated residential, urban reserve community growth) and has been provided in the Land Needs Assessment dated December 2024, as below (see Table M-16). The non-residential VLI identified lands for potential development within the UGB and includes lands within the BAB and Greenfield Area. The VLI land supply calculation included standalone and mixed-use commercial land use based on The London Plan place type designations. This includes commercial uses in Commercial Industrial Place Type but does not consider other industrial place types.

Category	Commercial (ha)	Institutional (ha)	Total (ha)
Registered Subdivision, Condominium and Reference Plans	2	9	11
Draft Approved Subdivision and Condominium Plans	5	2	7
Draft Subdivision and Condominiums Plans Under Review	10	8	18
Site Plans	22	3	25
Potential Development	20	9	29
Official Plan Designations	53	143	196
Total	112	174	286

Table M-16. Non-Residential Vacant Land Inventory as of September 30, 2024

1.13 Greenfield Commercial and Institutional Lands Analysis

Future commercial and institutional land needs were determined by evaluating greenfield land supply and the capacity to accommodate projected demand over the 30-year planning horizon. The current greenfield land supply for commercial was calculated at 61 hectares whereas the institutional supply was calculated at 130 hectares.

There is land available within the greenfield area to accommodate the approximate demand of 43 hectares of standalone commercial noting that most of the commercial demand will be accommodated through mixed-use development, and 94 hectares of institutional lands. Demand calculations contemplated a 5% land requirement for stormwater management facilities. Based on these calculations, there is no demonstrated need for further expansion to the Urban Growth Boundary to accommodate growth on commercial or institutional land over the 30-year planning horizon. Table M-17 shows available greenfield land supply by sector.

Sector	City-Wide Supply (ha)	Greenfield Supply (ha)	Adjusted greenfield Demand (ha)	Greenfield (ha) remaining in 2054
Commercial	112	61	45	16
Institutional	174	130	98	32

Table M-17. Commercial and Institutional Greenfield Land Needs

1.14 Industrial Demand

The City of London is expected to require approximately 532 hectares of vacant land to accommodate employment growth of 14,630 industrial jobs from 2024 to 2054, as shown in Table M-19. The calculated requirement is based on the Council-endorsed assumptions of an average floor space per worker of 111m², a floor area ratio of 0.23, and an intensification rate of 25%. The land requirements shown in Table M-19 do not include any buffering required adjacent to natural features.

Year	Population	Activity Rate	Employment
2024	486,000	0.081	39,370
2029	510,000	0.08	40,800
2034	549,400	0.079	43,400
2039	588,600	0.078	45,910
2044	628,500	0.078	49,020
2049	669,100	0.077	51,520
2054	710,585	0.076	54,000

Table M-18. Industrial Growth Forecasts (2024-2054)

Year	Employment Growth	GFA (m ²)	Land Required (ha)	Greenfield Land Required (ha)
2024-2029	1,430	158,730	69.32	51.99
2029-2034	2,600	288,600	126.03	94.52
2034-2039	2,510	278,610	121.67	91.25
2039-2044	3,110	345,210	150.75	113.06
2044-2049	2,500	277,500	121.18	90.89
2049-2054	2,480	275,280	120.21	90.16
Total	14,630	1,623,930	709.15	531.86

Table M-19. Industrial Vacant Land Needs (2024-2054)

1.15 Industrial Supply

A summary of the vacant industrial land inventory has been provided below (see Table M-20). After removing the areas that met the Ineligible Land Criteria and the Unsuitable Land Criteria, the suitable VLI vacant industrial land supply was calculated at 575 hectares. It is important to use the suitable land supply for industrial land needs calculations because promoting economic development and competitiveness (PPS policy 2.8.1.1) is not conducive within the unsuitable industrial land supply.

Year	Hectares
2024	575.09
2029	523.11
2034	428.59
2039	337.34
2044	224.28
2049	133.39
2054	43.23

Table M-20. Industrial Vacant Land Supply (2024-2054)