

Report to Planning and Environment Committee

To: Chair and Members
Planning and Environment Committee
From: Scott Mathers, MPA, P.Eng.
Deputy City Manager, Housing and Community Growth
Subject: Official Plan Review of The London Plan: Draft Industrial Land
Needs Assessment (Employment Areas) and Process Update
File Number: O-9595
Public Participation Meeting
Date: April 8, 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:

- (a) That the Draft Industrial Land Needs Assessment (Employment Areas) attached hereto as Appendix “A” **BE RECEIVED** for continued consultation with the community and development industry;
- (b) That Civic Administration **BE DIRECTED** to receive landowner requests for candidate industrial properties to be evaluated for potential inclusion within the urban area of the city as part of the Urban Growth Boundary Review, noting an expansion is warranted based on the findings of the draft Industrial Land Needs Assessment (Employment Areas) contained in Appendix “A”;
- (c) That Civic Administration **BE DIRECTED** to undertake a review of Ineligible and Unsuitable industrial lands, as identified through the Draft Industrial Land Needs Assessment (Employment Areas), for possible land use redesignation; and
- (d) That this report **BE RECEIVED** for information.

IT BEING NOTED, that following consultations, the Industrial Land Needs Assessment for Employment Areas will be presented to future meetings of Council.

IT BEING FURTHER NOTED, the findings of the Urban Growth Boundary Review, including evaluation of landowner requests and blocks identified for evaluation by Civic Administration, are to be brought forward to a future meeting of the Planning and Environment Committee for Council adoption and circulation to the Ministry of Municipal Affairs and Housing for Ministry Approval.

IT BEING FURTHER NOTED THAT the development of lands within the Urban Growth Boundary Review expansion area will proceed as approved by Council through future planning approvals and the annual Growth Management Implementation Strategy process.

Executive Summary

The purpose of this report is to present the findings of the draft Industrial Land Needs Assessment (Employment Areas) (referred to hereafter as “ILNA”). This draft is for continued consultation with the community and development industry partners, noting that the 30-year planning horizon and 2024 Ministry of Finance population growth forecast have been incorporated into the draft for review. The draft ILNA reviewed land use demands and supply exclusively for employment lands. The Land Needs Assessment (Community Growth) previously adopted by Council in December 2024 includes the review for residential, institutional, and commercial (including Commercial Industrial) land uses.

The draft ILNA has identified a need for an additional 88 hectares of land be added to the municipality's urban area for new industrial uses while recognizing that an additional 468 hectares of industrial land are deemed to be unsuitable or ineligible for industrial development. The latter includes lands that do not conform with the *PPS 2024* (policy 2.8.1.1.(c)) which requires planning authorities to promote economic development through the identification of strategic sites and monitoring the suitability of sites based on market-readiness and barriers to investment. The need for an additional 88 hectares of developable land area is net of natural heritage or natural hazard, therefore the total hectareage of the parcels included for urban expansion may vary greatly compared to the number of hectares identified as the industrial need if such parcels included a developable and naturalized component. The findings of the draft ILNA will be subject to continuing consultation prior to finalization.

As per direction from the Minister of Municipal Affairs and Housing, the Urban Growth Boundary (UGB) Review will contemplate a 30-year planning horizon, consistent with the *PPS 2024*. Candidate industrial lands are now eligible to be submitted for consideration in the UGB Review. Following adoption of the final ILNA, the UGB Review will undertake a comprehensive evaluation of lands to be brought into the expanded UGB.

This report also provides a process update on the Section 26 Official Plan Review. First, this includes a response from the Minister of Municipal Affairs and Housing regarding Council's request for Provincial support for the UGB Review for Community Growth land uses based on the Housing Supply Marketplace Analysis received in December 2024, rather than the *PPS 2024*. Second, this report identifies additional policy reviews to be considered during next steps of the Official Plan Review of The London Plan based on recent Provincial policy directions.

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 considers 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, in association with related Housing Accelerator Fund (HAF) projects address 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; and
- 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 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. 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. may be considered at the site plan phase.

Analysis

1.0 Background Information

1.1 Previous Reports Related 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.

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 existing land supply can accommodate projected population and employment growth over the defined planning horizon.

Following the release of the draft *Provincial Policy Statement* issued by the Province in April 2023, the Official Plan Review was paused in July 2023. However, the LNA component of the review was continued to address housing and land supply needs. Due to uncertainty related to potential changes in provincial policy, Ministry of Municipal Affairs and Housing (MMAH) staff were consulted on the continuation of the Official Plan Review. In March 2024 the City reinitiated the Section 26 Official Plan Review as a phased review, with the LNA for Community Growth intended as the first phase.

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 *Provincial Planning Statement (PPS 2024)* came into force and effect replacing the *Provincial Policy Statement 2020*. The new provincial policy framework included significant changes to growth management planning. *PPS 2024* permitted the use of a time horizon between 20 to 30-years of projected land needs and required planning authorities to base growth forecasts on Ministry of Finance population projections. On December 17, 2024, Council adopted the final LNA for Community

Growth and initiated an Urban Growth Boundary Review contemplating a 30-year planning horizon of approximately 1,476 hectares, which is the maximum permitted under the PPS. Council also directed Staff to develop an alternate UGB Review scenario of approximately 2,000 hectares based on the Housing Supply Marketplace Analysis, if Provincial support was received for the alternate scenario.

The ILNA has been concurrently undertaken and includes an analysis of the suitability and market-readiness of industrial lands in conformity with policy 2.8.1.1 of the *PPS 2024*. To remain in alignment with Council directions related to the LNA for Community Growth, the ILNA was presented separately allowing for updates to incorporate 2024 Ministry of Finance population projections and a 30-year planning horizon.

1.3 Financial Impact

The ILNA is expected to have financial impacts to the City; however, the costs associated will not be known until the forthcoming UGB Review. 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 identified as part 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 Methodology

In alignment with the Land Needs Assessment (Community Growth), the ILNA considered assumptions from the Council-endorsed Reference Growth Scenario for industrial growth projections, including anticipated intensification rate for industrial development, employment activity rate, floor space per worker, and floor area ratio. These demand assumptions were applied to the 2024 Ministry of Finance population projections to align with the requirements of the *PPS 2024*. The ILNA also applies a 30-year planning horizon, as directed by Council on December 17, 2024.

2.2 Demand Calculations

The industrial sector is expected to maintain steady growth post-pandemic with an annual employment growth rate of 1.5% over the 30-year planning horizon. In response to this anticipated growth, the sector is projecting gross floor area (GFA) growth with an average of 67,562 m² of development annually. Land demand calculations assumed an average floor space per worker (FSW) of 111m², a floor area ratio (FAR) of 0.23, and an intensification rate of 25%.

The resulting demand for industrial land use was calculated as 886 ha total, with 221 ha occurring as intensification and 664 ha requiring vacant industrial land for new development.

2.3 Land Supply

The foundation for the ILNA is the City's Vacant Land Inventory (VLI). The 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 point in time. The VLI includes categories of development for vacant lands as well as development applications within the "development pipeline".

The two categories of vacant land considered for the ILNA include:

- **Vacant land**, meaning the entire parcel has not been previously developed upon for its current planned function and this land is available for new developments, and
- **Underutilized land**, meaning a portion of an existing developed parcel is vacant. Underutilized 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. For the purposes of the ILNA, intensification is considered development that occurs on underutilized industrial land.

For the ILNA, 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 *PPS 2024* 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]. This analysis removed industrial land that met the Ineligible Land Criteria, which negatively impacts the capability of lands to accommodate industrial development; additionally, this process removed industrial land that met the Unsuitable Land Criteria, which negatively impact the suitability of lands to meet the requirements of the market.

2.4 Resulting Land Need

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 Industrial land uses is warranted.

There is also approximately 259 ha of land that meets the Ineligible Land Criteria and 209 ha of land that meets the Unsuitable Land Criteria; these lands should be evaluated for potential redesignation to a more suitable place type in The London Plan.

2.5 Urban Growth Boundary Expansion

Based on the results of the draft ILNA, the City must consider including additional land within the UGB. A set of evaluation criteria, in alignment with policy 76 of The London Plan, is attached as Appendix B to this report. Consistent with the *PPS 2024*, the criteria are intended to support the evaluation of the most appropriate lands to be considered for inclusion within the UGB.

Certain landowners have already submitted requests for sites to be evaluated, and those requests previously submitted to Staff are shown in Appendix C. Following this update to Council, further requests can be submitted to Staff to be evaluated against the evaluation criteria identified in Appendix B to this report.

2.6 Request for Minister Zoning Order

At a February 19, 2025, meeting of the Planning and Environment Committee, a landowner requested City support for their 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 uses. It should be noted that the identified lands had been previously submitted as a candidate site and were to be evaluated within the context of the UGB Review. The site is approximately 29 hectares in size, with approximately 24.7 developable hectares (21.5 ha of developable land North of Dingman Creek and 3.2 ha of developable land South of Dingman Creek with area contingent on Dingman Creek floodplain mitigation). The MZO request received Council endorsement on March 4, 2025, and will require Ministerial approval in accordance with the zoning order framework requirements. Notwithstanding the departure taken by the applicant, the lands at 4423 Highbury Avenue South will continue to be evaluated through the Industrial UGB Review, noting the decision of the provincial MZO process will be applied towards the Industrial component of the UGB Review.

3.0 Update on Official Plan Review of The London Plan

3.1 Minister of Municipal Affairs and Housing Response

On December 17, 2024, Council approved the final Land Needs Assessment (Community Growth) and directed an expansion of the current UGB to designate additional lands for urban uses. Council endorsed two UGB expansion scenarios. First, a scenario of approximately 1,476 ha of developable land, corresponding to a 30-year planning horizon in conformity with the maximum time horizon permitted in the *PPS 2024*. Second, a scenario of 2,000 ha of developable land based on the Housing Supply Marketplace Analysis findings, if provincial support is received for this alternate scenario.

On January 28, 2025, a letter was received from the Minister of Municipal Affairs and Housing regarding the request to support the expansion identified in the Housing Supply Marketplace Analysis. The Minister's letter directed that the decisions of the City are to be consistent with the *PPS 2024*. Specifically, the Minister recommended that "the City of London consider all the available information, including adjustments for matters like the local market contingency factor, and make a determination that is in accordance with the policies in *PPS 2024*". The letter states that the Province considers the policies of the *PPS 2024* to provide municipalities with additional flexibility regarding Settlement Area Boundary Expansions, considering housing needs and land use demands.

The forthcoming Urban Growth Boundary Review for Community Growth land uses will be consistent with the *PPS 2024* and as a result of the Minister's response, the City will pursue a UGB expansion to include 1,476 ha of new lands into the urban area. The letter received from the Ministry of Municipal Affairs and Housing is attached as Appendix D to this report.

3.2 Private Urban Growth Boundary Expansion Amendments: Community and Industrial Growth

PPS 2024 introduced significant changes to provincial growth management policies and the settlement area expansion process. The Municipal Comprehensive Review is no longer a defined process under *PPS 2024* and private applications to expand the settlement area are now permitted outside of a comprehensive review. Staff have directed interested parties to submit requests for evaluation through the UGB Review process, which is currently ongoing. A report related to private applications for UGB expansions is anticipated in Q3 2025 and may consider amendments to planning application and growth management policies within The London Plan. With Council direction amendments would identify considerations for the additional 526 hectares of developable land consistent with the findings of the Council-approved Housing Supply Marketplace Analysis.

3.3 Employment Area Amendments

PPS 2024 amended the definition for Employment Areas and excluded "institutional and commercial [uses], including retail and office not associated with the primary employment use".

A subsequent phase of the Official Plan Review will undertake a policy conformity review, including a review of the new Employment Area definition. This is currently anticipated for Q4 of 2025. Amendments to the Industrial Place Types within The London Plan may be contemplated to ensure conformity with *PPS 2024* and updated provincial direction.

For the purposes of the ILNA attached in Appendix A to this report, lands designated as Light Industrial, Heavy Industrial, and Future Industrial Growth Place Types were evaluated in accordance with the amended Employment Area definition. Similarly, lands designated under the Commercial Industrial Place Type were evaluated as part of the commercial land supply within the LNA for Community Growth.

4.0 Next Steps

The following is a summary of next steps that will be taken related to the Official Plan Review and Land Needs Assessment:

- Receive and evaluate landowner requests related to industrial land use for inclusion within the UGB, submission deadline May 30, 2025.
- Continue Indigenous, Community, and Development Industry consultations as part of the UGB Review, ongoing Q1 and Q2 2025.
- Final Industrial Land Needs Assessment (Employment Areas) report, targeted Q2 2025.
- Private Urban Growth Boundary Expansion Amendments report, targeted Q3 2025.
- Final Urban Growth Boundary Review report (Community and Industrial Growth), targeted Q4 2025.
- Review Ineligible and Unsuitable industrial lands and make recommendations on appropriate redesignation of identified lands.
- Subsequent phases of the Official Plan Review are anticipated to include policy conformity exercise under the *Provincial Planning Statement*.

Conclusion

This report presents the draft ILNA, which identifies the need for a **UGB expansion of 88 hectares for industrial land uses**. This report recommends additional consultation on the draft ILNA noting that the draft has contemplated a 30-year planning horizon based on the Ministry of Finance growth forecast. A final ILNA will be presented to Council, anticipating a meeting in Q2 2025, and incorporating any feedback received through the forthcoming consultations. This report recommends that staff receive and evaluate industrial landowner requests for sites to be evaluated as part of the industrial component of the UGB Review. A finalized list of landowner requests for expansion will be presented with the final ILNA. Evaluation results related to the UGB Review will be presented in a separate report to Council, targeted for Q4 2025.

In addition, this report recommends an assessment of Ineligible and Unsuitable industrial lands to be considered for a change in land use place type.

The Minister of Municipal Affairs and Housing has also confirmed, by letter dated January 28, 2025, that consistency with the *PPS 2024* is required for the City of London's UGB Review for Community Growth (non-Industrial) land uses. Recommendations in forthcoming UGB Review reports will therefore align with the *PPS 2024* and correspond to a 30-year planning horizon.

Additional policy reviews will also be included within subsequent phases of the Section 26 Official Plan Review. Based on recent changes to Provincial policy directions, these will include reviews of the definition and permitted uses in Employment Areas, and requirements for private UGB expansion applications.

Prepared by: **Darcy Vander Pryt**
Planner, Strategic Land Development

Felipe Parra Hein
Planner, Planning Policy (Growth Management)

Brandon Coveney
Senior Planner, Planning Policy (Growth Management)

Reviewed by: **Travis Macbeth, MCIP, RPP**
Manager, Planning Policy (Growth Management)

Recommended by: **Heather McNeely, MCIP, RPP**
Director, Planning and Development

Submitted by: **Scott Mathers, MPA, P.Eng.**
Deputy City Manager, Housing and Community Growth

Copy:

Justin Adema, Manager, Long Range Planning

Nancy Pasato, Manager, Planning Policy (Research)

Jeff Shaughnessy, Manager, Planning Policy (GIS Planning and Communication
Supports)

Matt Feldberg, Director, Municipal Housing and Industrial Development

Michael Tomazincic, Manager, Strategic Land Development

Appendix A – Draft Industrial Land Needs Assessment (Employment Areas)

2024-2054

Industrial Land Needs Assessment: Employment Areas

**Housing and Community Growth
City of London**

April 2025

Table of Contents

1	INTRODUCTION	3
1.1	Policy Context	3
1.1.1	The <i>Planning Act</i>	4
1.1.2	<i>Provincial Planning Statement, 2024</i>	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)	6
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	9
1.5	Land Needs Assessment for 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	38

1 INTRODUCTION

This report documents the findings of the City of London's Industrial Land Needs Assessment for Employment Areas (ILNA). 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 2024)* 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 UGB Review or expansion. Instead, this report will analyze the supply of industrial land within the city's UGB 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 UGB 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 ILNA was developed within the context of the provincial legislation, *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*. The new *PPS 2024* 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 2024* 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 2024* 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 required 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 LNA for Community Growth and directed staff to apply a 30-year planning horizon, which is consistent with the *PPS 2024*.

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 UGB is justified to meet required land needs through an ILNA, 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 *PPS 2024*.

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 ILDS, 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 ILNA include land use changes and natural heritage loss / disconnection. In evaluating candidate locations for UGB 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 UGB 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 ILNA applies the 2024 Ministry of Finance population projections for land use purposes, which is now required as part of the *PPS 2024* 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 ILNA 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 (6) 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 ILNA, 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 UGB.

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 ILNA allocates industrial land supply into two categories of vacant land and underutilized land as identified in the 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, 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 *PPS 2024* 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 ILNA, 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 *PPS 2024*, 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 LNA for Community Growth report.

Intensification

Intensification, as defined in the *PPS 2024*, 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 ILNA, 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 ILNA.

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 VLI 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 *PPS 2024* 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 ILNA 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 UGB 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 UGB 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 for Community Growth

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

land into the UGB 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 UGB 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 UGB 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.

Map 1 - 13	Vacant									
Map 1 - 14	Vacant									
Map 1 - 15	Vacant									
Map 1 - 16	Vacant									
Map 1 - 17	Vacant									
Map 1 - 18	Vacant									
Map 1 - 19	Vacant									
Map 1 - 20	Vacant									
Map 1 - 21	Vacant									
Map 1 - 22	Unsuitable									X
Map 1 - 23	Underutilized									
Map 1 - 24	Vacant									
Map 2 - 25	Underutilized									
Map 2 - 26	Underutilized									
Map 1 - 27	Ineligible						X			
Map 1 - 28	Vacant									
Map 1 - 29	Vacant									
Map 1 - 30	Vacant									
Map 1 - 31	Vacant									
Map 1 - 32	Vacant									
Map 1 - 33	Vacant									
Map 1 - 34	Vacant									
Map 1 - 35	Vacant									
Map 2 - 36	Vacant									
Map 2 - 37	Ineligible						X			
Map 2 - 38	Underutilized									
Map 2 - 39	Underutilized									
Map 2 - 40	Underutilized									
Map 2 - 41	Underutilized									
Map 1 - 42	Vacant									

Map 1 - 43	Vacant									
Map 1 - 44	Vacant									
Map 1 - 45	Vacant									
Map 1 - 46	Underutilized									
Map 1 - 47	Underutilized									
Map 1 - 48	Vacant									
Map 1 - 49	Ineligible	X								
Map 1 - 50	Vacant									
Map 1 - 51	Vacant									
Map 1 - 52	Vacant									
Map 1 - 53	Vacant									
Map 1 - 54	Vacant									
Map 1 - 55	Vacant									
Map 1 - 56	Vacant									
Map 1 - 57	Vacant									
Map 1 - 58	Vacant									
Map 1 - 59	Underutilized									
Map 1 - 60	Underutilized									
Map 1 - 61	Vacant									
Map 1 - 62	Underutilized									
Map 1 - 63	Vacant									
Map 1 - 64	Ineligible	X								
Map 1 - 65	Vacant									
Map 1 - 66	Vacant									
Map 1 - 67	Underutilized									
Map 1 - 68	Vacant									
Map 1 - 69	Vacant									
Map 1 - 70	Vacant									
Map 1 - 71	Vacant									
Map 2 - 72	Underutilized									

Map 2 - 73	Underutilized									
Map 2 - 74	Vacant									
Map 2 - 75	Underutilized									
Map 2 - 76	Underutilized									
Map 2 - 77	Underutilized									
Map 2 - 78	Underutilized									
Map 2 - 79	Underutilized									
Map 2 - 80	Underutilized									
Map 2 - 81	Underutilized									
Map 2 - 82	Unsuitable								X	
Map 2 - 83	Underutilized									
Map 2 - 84	Unsuitable								X	
Map 2 - 85	Unsuitable								X	
Map 2 - 86	Underutilized									
Map 2 - 87	Underutilized									
Map 2 - 88	Underutilized									
Map 2 - 89	Underutilized									
Map 2 - 90	Unsuitable								X	
Map 2 - 91	Underutilized									
Map 8 - 92	Underutilized									
Map 8 - 93	Ineligible						X			
Map 8 - 94	Unsuitable								X	
Map 8 - 95	Unsuitable								X	
Map 8 - 96	Unsuitable								X	
Map 8 - 97	Unsuitable								X	
Map 8 - 98	Unsuitable								X	
Map 8 - 99	Unsuitable								X	
Map 8 - 100	Unsuitable								X	
Map 8 - 101	Unsuitable								X	
Map 8 - 102	Unsuitable								X	

Map 8 - 103	Ineligible		X							
Map 8 - 104	Ineligible		X							
Map 8 - 105	Ineligible		X							
Map 8 - 106	Ineligible		X							
Map 8 - 107	Ineligible		X							
Map 8 - 108	Ineligible		X							
Map 8 - 109	Ineligible		X							
Map 8 - 110	Ineligible		X							
Map 8 - 111	Ineligible		X							
Map 8 - 112	Unsuitable		X							
Map 8 - 113	Underutilized									
Map 8 - 114	Unsuitable						X			
Map 8 - 115	Ineligible	X								
Map 8 - 116	Unsuitable							X		
Map 8 - 117	Underutilized									
Map 8 - 118	Ineligible					X				
Map 8 - 119	Unsuitable							X		
Map 8 - 120	Underutilized									
Map 8 - 121	Underutilized									
Map 8 - 122	Unsuitable							X		
Map 8 - 123	Unsuitable							X		
Map 8 - 124	Unsuitable							X		
Map 8 - 125	Underutilized									
Map 8 - 126	Unsuitable							X		
Map 8 - 127	Underutilized									
Map 8 - 128	Underutilized									
Map 8 - 129	Underutilized									
Map 8 - 130	Underutilized									
Map 8 - 131	Underutilized									
Map 3 - 132	Underutilized									

Map 3 - 133	Underutilized									
Map 3 - 134	Underutilized									
Map 3 - 135	Vacant									
Map 3 - 136	Underutilized									
Map 3 - 137	Vacant									
Map 3 - 138	Unsuitable									X
Map 3 - 139	Underutilized									
Map 3 - 140	Underutilized									
Map 3 - 141	Vacant									
Map 3 - 142	Vacant									
Map 3 - 143	Vacant									
Map 3 - 144	Vacant									
Map 3 - 145	Underutilized									
Map 3 - 146	Underutilized									
Map 3 - 147	Unsuitable									X
Map 3 - 148	Vacant									
Map 3 - 149	Underutilized									
Map 3 - 150	Underutilized									
Map 3 - 151	Vacant									
Map 3 - 152	Underutilized									
Map 3 - 153	Underutilized									
Map 3 - 154	Underutilized									
Map 3 - 155	Underutilized									
Map 3 - 156	Underutilized									
Map 3 - 157	Vacant									
Map 3 - 158	Underutilized									
Map 2 - 159	Unsuitable								X	
Map 2 - 160	Unsuitable								X	
Map 2 - 161	Unsuitable								X	
Map 2 - 162	Underutilized									

Map 3 - 163	Vacant									
Map 3 - 164	Underutilized									
Map 3 - 165	Underutilized									
Map 3 - 166	Underutilized									
Map 3 - 167	Underutilized									
Map 3 - 168	Unsuitable									X
Map 3 - 169	Underutilized									
Map 3 - 170	Vacant									
Map 3 - 171	Unsuitable							X		
Map 3 - 172	Underutilized									
Map 3 - 173	Unsuitable							X		
Map 3 - 174	Unsuitable							X		
Map 3 - 175	Underutilized									
Map 3 - 176	Unsuitable							X		
Map 3 - 177	Underutilized									
Map 3 - 178	Unsuitable								X	
Map 3 - 179	Underutilized									
Map 3 - 180	Vacant									
Map 3 - 181	Underutilized									
Map 3 - 182	Underutilized									
Map 3 - 183	Unsuitable							X		
Map 3 - 184	Unsuitable							X		
Map 3 - 185	Unsuitable							X		
Map 3 - 186	Underutilized									
Map 3 - 187	Underutilized									
Map 3 - 188	Vacant									
Map 3 - 189	Underutilized									
Map 3 - 190	Vacant									
Map 3 - 191	Underutilized									
Map 3 - 192	Underutilized									

Map 3 - 193	Underutilized									
Map 3 - 194	Underutilized									
Map 3 - 195	Unsuitable							X		
Map 3 - 196	Ineligible	X								
Map 4 - 197	Underutilized									
Map 4 - 198	Vacant									
Map 4 - 199	Ineligible			X						
Map 4 - 200	Underutilized									
Map 4 - 201	Underutilized									
Map 4 - 202	Underutilized									
Map 4 - 203	Underutilized									
Map 4 - 204	Underutilized									
Map 4 - 205	Underutilized									
Map 4 - 206	Underutilized									
Map 4 - 207	Ineligible		X							
Map 4 - 208	Ineligible		X							
Map 4 - 209	Ineligible		X							
Map 4 - 210	Underutilized									
Map 4 - 211	Underutilized									
Map 4 - 212	Underutilized									
Map 4 - 213	Unsuitable							X		
Map 4 - 214	Unsuitable							X		
Map 4 - 215	Underutilized									
Map 4 - 216	Underutilized									
Map 4 - 217	Underutilized									
Map 4 - 218	Underutilized									
Map 4 - 219	Vacant									
Map 4 - 220	Underutilized									
Map 4 - 221	Underutilized									
Map 4 - 222	Unsuitable							X		

Map 4 - 223	Unsuitable							X		
Map 4 - 224	Unsuitable							X		
Map 4 - 225	Unsuitable							X		
Map 4 - 226	Unsuitable							X		
Map 4 - 227	Unsuitable							X		
Map 4 - 228	Unsuitable							X		
Map 4 - 229	Underutilized									
Map 4 - 230	Underutilized									
Map 4 - 231	Vacant									
Map 4 - 232	Underutilized									
Map 4 - 233	Underutilized									
Map 4 - 234	Underutilized									
Map 4 - 235	Underutilized									
Map 4 - 236	Underutilized									
Map 4 - 237	Underutilized									
Map 4 - 238	Underutilized									
Map 6 - 239	Unsuitable									X
Map 6 - 240	Ineligible	X								
Map 6 - 241	Unsuitable									X
Map 6 - 242	Ineligible	X								
Map 6 - 243	Underutilized									
Map 6 - 244	Underutilized									
Map 6 - 245	Underutilized									
Map 6 - 246	Underutilized									
Map 6 - 247	Underutilized									
Map 6 - 248	Vacant									
Map 5 - 249	Underutilized									
Map 5 - 250	Unsuitable							X		
Map 5 - 251	Underutilized									
Map 5 - 252	Underutilized									

Map 5 - 253	Underutilized									
Map 5 - 254	Underutilized									
Map 5 - 255	Underutilized									
Map 5 - 256	Underutilized									
Map 5 - 257	Unsuitable								X	
Map 5 - 258	Underutilized									
Map 5 - 259	Underutilized									
Map 5 - 260	Underutilized									
Map 5 - 261	Underutilized									
Map 5 - 262	Underutilized									
Map 5 - 263	Underutilized									
Map 5 - 264	Underutilized									
Map 5 - 265	Unsuitable							X		
Map 5 - 266	Unsuitable							X		
Map 5 - 267	Unsuitable								X	
Map 5 - 268	Unsuitable								X	
Map 5 - 269	Unsuitable								X	
Map 5 - 270	Underutilized									
Map 5 - 271	Unsuitable								X	
Map 5 - 272	Unsuitable								X	
Map 5 - 273	Underutilized									
Map 5 - 274	Vacant									
Map 5 - 275	Unsuitable								X	
Map 5 - 276	Unsuitable								X	
Map 5 - 277	Unsuitable									X
Map 8 - 278	Unsuitable							X		
Map 8 - 279	Underutilized									
Map 8 - 280	Underutilized									
Map 8 - 281	Underutilized									
Map 8 - 282	Unsuitable							X		

Map 8 - 283	Unsuitable							X		
Map 8 - 284	Unsuitable							X		
Map 8 - 285	Ineligible						X			
Map 8 - 286	Unsuitable							X		
Map 8 - 287	Underutilized									
Map 8 - 288	Ineligible	X								
Map 6 - 289	Vacant									
Map 6 - 290	Vacant									
Map 6 - 291	Vacant									
Map 6 - 292	Ineligible					X				
Map 6 - 293	Unsuitable							X		
Map 6 - 294	Ineligible					X				
Map 6 - 295	Unsuitable									X
Map 6 - 296	Ineligible			X						
Map 6 - 297	Unsuitable									X
Map 7 - 298	Vacant									
Map 7 - 299	Vacant									
Map 7 - 300	Vacant									
Map 7 - 301	Ineligible			X						
Map 7 - 302	Vacant									
Map 7 - 303	Vacant									
Map 7 - 304	Vacant									
Map 7 - 305	Vacant									
Map 7 - 306	Vacant									
Map 7 - 307	Vacant									
Map 7 - 308	Vacant									
Map 7 - 309	Vacant									
Map 7 - 310	Vacant									
Map 7 - 311	Ineligible			X						
Map 7 - 312	Underutilized									

Map 7 - 313	Underutilized									
Map 7 - 314	Underutilized									
Map 7 - 315	Underutilized									
Map 7 - 316	Vacant									
Map 7 - 317	Underutilized									
Map 7 - 318	Underutilized									
Map 7 - 319	Underutilized									
Map 7 - 320	Underutilized									
Map 7 - 321	Unsuitable			X						
Map 7 - 322	Unsuitable			X						
Map 7 - 323	Unsuitable			X						
Map 7 - 324	Vacant									
Map 7 - 325	Underutilized									
Map 7 - 326	Vacant									
Map 7 - 327	Vacant									
Map 7 - 328	Vacant									
Map 7 - 329	Vacant									
Map 7 - 330	Vacant									
Map 7 - 331	Vacant									
Map 7 - 332	Vacant									
Map 7 - 333	Vacant									
Map 7 - 334	Vacant									
Map 7 - 335	Ineligible				X					
Map 7 - 336	Vacant									
Map 7 - 337	Ineligible				X					
Map 7 - 338	Vacant									
Map 7 - 339	Vacant									
Map 7 - 340	Underutilized									
Map 7 - 341	Unsuitable									X
Map 7 - 342	Unsuitable									X

Map 7 - 343	Unsuitable									X
Map 7 - 344	Unsuitable									X
Map 7 - 345	Ineligible				X					
Map 7 - 346	Ineligible				X					
Map 7 - 347	Unsuitable									X
Map 7 - 348	Ineligible				X					
Map 7 - 349	Unsuitable									X
Map 7 - 350	Ineligible				X					
Map 7 - 351	Ineligible				X					
Map 7 - 352	Ineligible				X					
Map 9 - 353	Vacant									
Map 9 - 354	Vacant									
Map 9 - 355	Ineligible				X					
Map 9 - 356	Vacant									
Map 9 - 357	Ineligible				X					
Map 9 - 358	Vacant									
Map 9 - 359	Ineligible				X					
Map 9 - 360	Unsuitable									X
Map 9 - 361	Ineligible				X					
Map 9 - 362	Unsuitable									X
Map 9 - 363	Unsuitable									X
Map 9 - 364	Unsuitable									X
Map 9 - 365	Ineligible				X					
Map 9 - 366	Unsuitable									X
Map 9 - 367	Ineligible				X					
Map 9 - 368	Unsuitable									X
Map 9 - 369	Ineligible				X					
Map 9 - 370	Ineligible						X			
Map 9 - 371	Ineligible				X					
Map 9 - 372	Ineligible						X			

Map 9 - 373	Ineligible						X			
Map 9 - 374	Ineligible						X			
Map 9 - 375	Ineligible				X					
Map 9 - 376	Ineligible				X					
Map 9 - 377	Vacant									
Map 9 - 378	Ineligible				X					
Map 9 - 379	Ineligible			X						
Map 9 - 380	Ineligible				X					
Map 9 - 381	Ineligible			X						
Map 9 - 382	Vacant									
Map 9 - 383	Vacant									
Map 9 - 384	Ineligible				X					
Map 9 - 385	Ineligible				X					
Map 9 - 386	Vacant									
Map 9 - 387	Ineligible				X					
Map 9 - 388	Vacant									
Map 9 - 389	Ineligible				X					
Map 9 - 390	Ineligible				X					
Map 9 - 391	Ineligible	X								
Map 9 - 392	Ineligible				X					
Map 9 - 393	Vacant									
Map 9 - 394	Underutilized									
Map 9 - 395	Underutilized									
Map 9 - 396	Underutilized									
Map 9 - 397	Underutilized									
Map 9 - 398	Underutilized									
Map 9 - 399	Underutilized									
Map 9 - 400	Underutilized									
Map 9 - 401	Underutilized									
Map 9 - 402	Underutilized									

Map 9 - 403	Underutilized									
Map 9 - 404	Underutilized									
Map 9 - 405	Underutilized									
Map 9 - 406	Underutilized									
Map 9 - 407	Underutilized									
Map 9 - 408	Ineligible				X					
Map 9 - 409	Vacant									
Map 9 - 410	Vacant									
Map 9 - 411	Ineligible				X					
Map 9 - 412	Ineligible				X					
Map 9 - 413	Ineligible					X				
Map 9 - 414	Underutilized									
Map 9 - 415	Underutilized									
Map 9 - 416	Underutilized									
Map 9 - 417	Vacant									
Map 9 - 418	Ineligible				X					
Map 9 - 419	Vacant									
Map 9 - 420	Ineligible				X					
Map 9 - 421	Vacant									
Map 9 - 422	Ineligible				X					
Map 9 - 423	Vacant									
Map 9 - 424	Ineligible	X								
Map 9 - 425	Vacant									
Map 9 - 426	Ineligible	X								
Map 9 - 427	Vacant									
Map 9 - 428	Ineligible	X								
Map 9 - 429	Underutilized									
Map 9 - 430	Underutilized									
Map 9 - 431	Underutilized									
Map 9 - 432	Underutilized									

Map 9 - 433	Underutilized									
Map 9 - 434	Underutilized									
Map 9 - 435	Underutilized									
Map 9 - 436	Underutilized									
Map 9 - 437	Underutilized									
Map 9 - 438	Underutilized									
Map 9 - 439	Underutilized									
Map 9 - 440	Underutilized									
Map 9 - 441	Underutilized									
Map 9 - 442	Underutilized									
Map 9 - 443	Vacant									
Map 9 - 444	Ineligible				X					
Map 9 - 445	Underutilized									
Map 9 - 446	Underutilized									
Map 9 - 447	Underutilized									
Map 9 - 448	Underutilized									
Map 9 - 449	Ineligible				X					
Map 9 - 450	Vacant									
Map 10 - 451	Ineligible				X					
Map 10 - 452	Underutilized									
Map 10 - 453	Underutilized									
Map 10 - 454	Underutilized									
Map 10 - 455	Underutilized									
Map 10 - 456	Underutilized									
Map 10 - 457	Underutilized									
Map 10 - 458	Underutilized									
Map 10 - 459	Ineligible				X					
Map 10 - 460	Ineligible				X					
Map 10 - 461	Underutilized									
Map 10 - 462	Underutilized									

Map 10 - 463	Underutilized									
Map 10 - 464	Ineligible				X					
Map 10 - 465	Ineligible				X					
Map 10 - 466	Ineligible	X								
Map 10 - 467	Ineligible				X					
Map 10 - 468	Ineligible				X					
Map 10 - 469	Unsuitable								X	
Map 10 - 470	Ineligible			X						
Map 10 - 471	Ineligible				X					
Map 10 - 472	Ineligible	X								
Map 10 - 473	Underutilized									
Map 10 - 474	Ineligible				X					
Map 10 - 475	Ineligible				X					
Map 10 - 476	Ineligible				X					
Map 10 - 477	Ineligible					X				
Map 10 - 478	Ineligible				X					
Map 10 - 479	Ineligible					X				
Map 10 - 480	Ineligible				X					
Map 10 - 481	Ineligible				X					
Map 10 - 482	Ineligible					X				
Map 10 - 483	Ineligible				X					
Map 10 - 484	Ineligible				X					
Map 10 - 485	Ineligible					X				
Map 9 - 486	Underutilized									
Map 9 - 487	Underutilized									
Map 9 - 488	Underutilized									
Map 9 - 489	Underutilized									
Map 9 - 490	Underutilized									
Map 9 - 491	Underutilized									
Map 9 - 492	Underutilized									

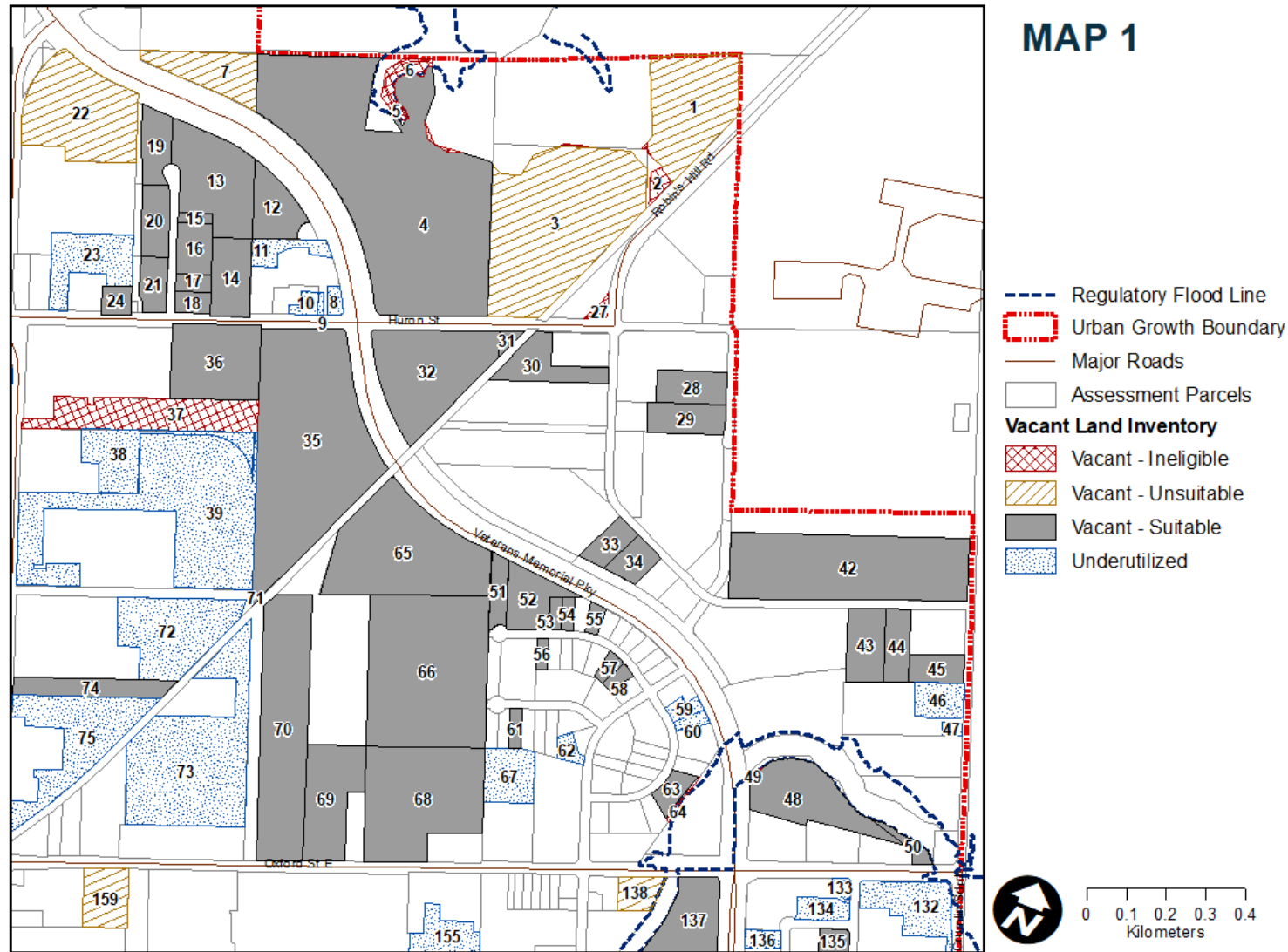
Map 10 - 493	Underutilized									
Map 10 - 494	Underutilized									
Map 10 - 495	Underutilized									
Map 10 - 496	Underutilized									
Map 10 - 497	Underutilized									
Map 10 - 498	Ineligible				X					
Map 10 - 499	Underutilized									
Map 10 - 500	Underutilized									
Map 10 - 501	Vacant									
Map 10 - 502	Underutilized									
Map 10 - 503	Underutilized									
Map 10 - 504	Ineligible				X					
Map 10 - 505	Ineligible				X					
Map 10 - 506	Ineligible			X						
Map 10 - 507	Ineligible				X					
Map 10 - 508	Ineligible	X								
Map 10 - 509	Ineligible	X								
Map 10 - 510	Ineligible	X								
Map 10 - 511	Ineligible	X								
Map 11 - 512	Underutilized									
Map 11 - 513	Underutilized									
Map 11 - 514	Unsuitable							X		
Map 11 - 515	Unsuitable							X		
Map 11 - 516	Unsuitable							X		
Map 11 - 517	Unsuitable							X		
Map 11 - 518	Underutilized									
Map 11 - 519	Underutilized									
Map 11 - 520	Ineligible					X				
Map 11 - 521	Ineligible				X					
Map 11 - 522	Ineligible				X					

Map 11 - 523	Ineligible				X					
Map 11 - 524	Ineligible				X					
Map 11 - 525	Ineligible	X								
Map 11 - 526	Ineligible				X					
Map 11 - 527	Ineligible				X					
Map 11 - 528	Ineligible	X								
Map 11 - 529	Ineligible				X					
Map 11 - 530	Ineligible	X								
Map 11 - 531	Ineligible	X								
Map 11 - 532	Ineligible				X					
Map 11 - 533	Ineligible	X								
Map 11 - 534	Ineligible	X								
Map 11 - 535	Ineligible				X					
Map 11 - 536	Ineligible				X					
Map 11 - 537	Ineligible				X					
Map 11 - 538	Ineligible				X					
Map 11 - 539	Underutilized									
Map 11 - 540	Underutilized									
Map 11 - 541	Underutilized									
Map 11 - 542	Underutilized									
Map 11 - 543	Underutilized									
Map 11 - 544	Unsuitable							X		
Map 11 - 545	Unsuitable							X		
Map 11 - 546	Underutilized									
Map 11 - 547	Unsuitable							X		
Map 11 - 548	Ineligible				X					
Map 11 - 549	Unsuitable							X		
Map 11 - 550	Ineligible				X					
Map 11 - 551	Underutilized									
Map 11 - 552	Underutilized									

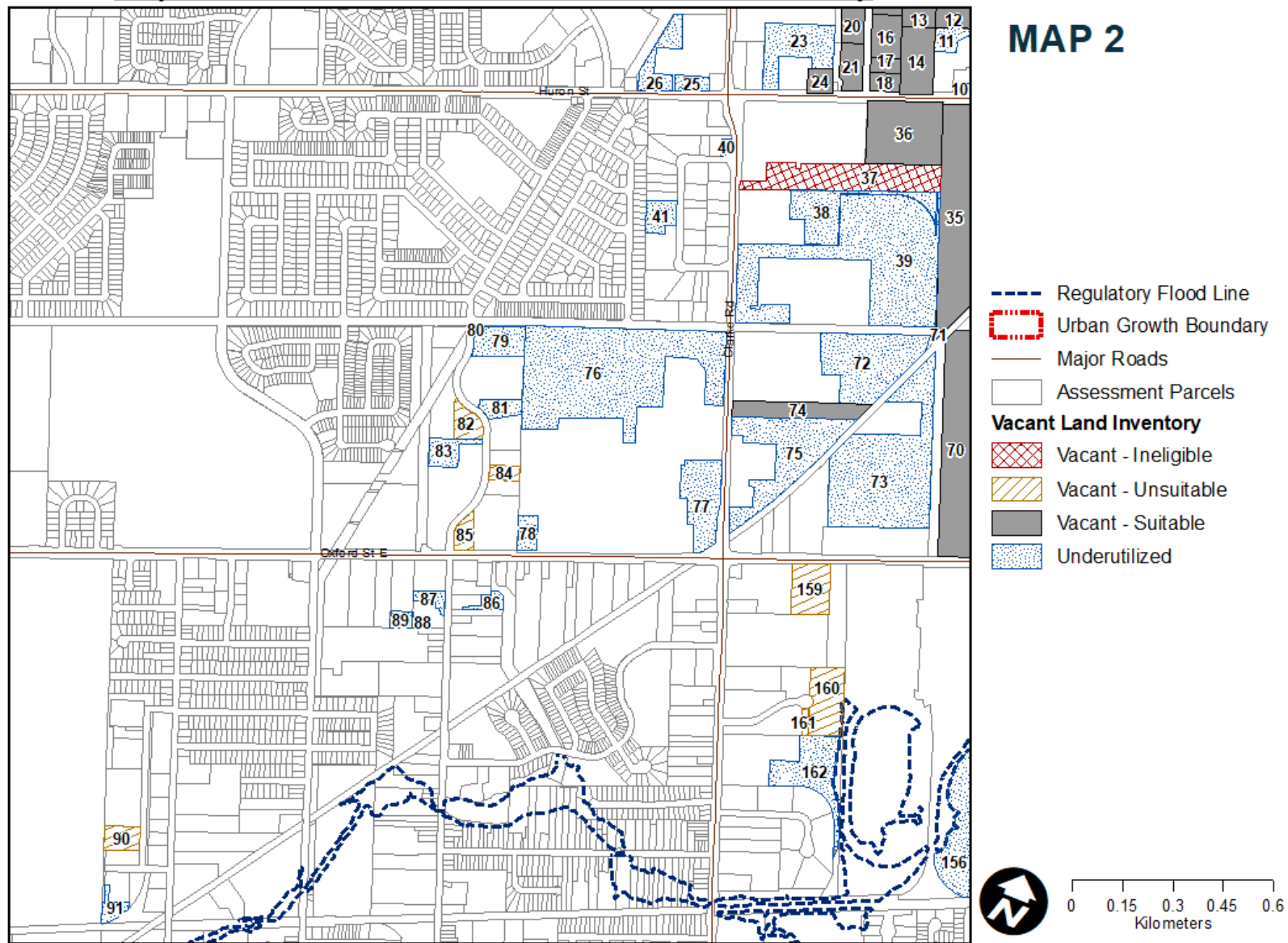
Map 11 - 553	Unsuitable								X	
Map 11 - 554	Ineligible				X					
Map 11 - 555	Unsuitable								X	
Map 11 - 556	Unsuitable								X	
Map 11 - 557	Unsuitable								X	
Map 11 - 558	Unsuitable							X		
Map 11 - 559	Underutilized									
Map 11 - 560	Ineligible				X					
Map 11 - 561	Ineligible			X						

5 APPENDIX B – VLI Supply Maps

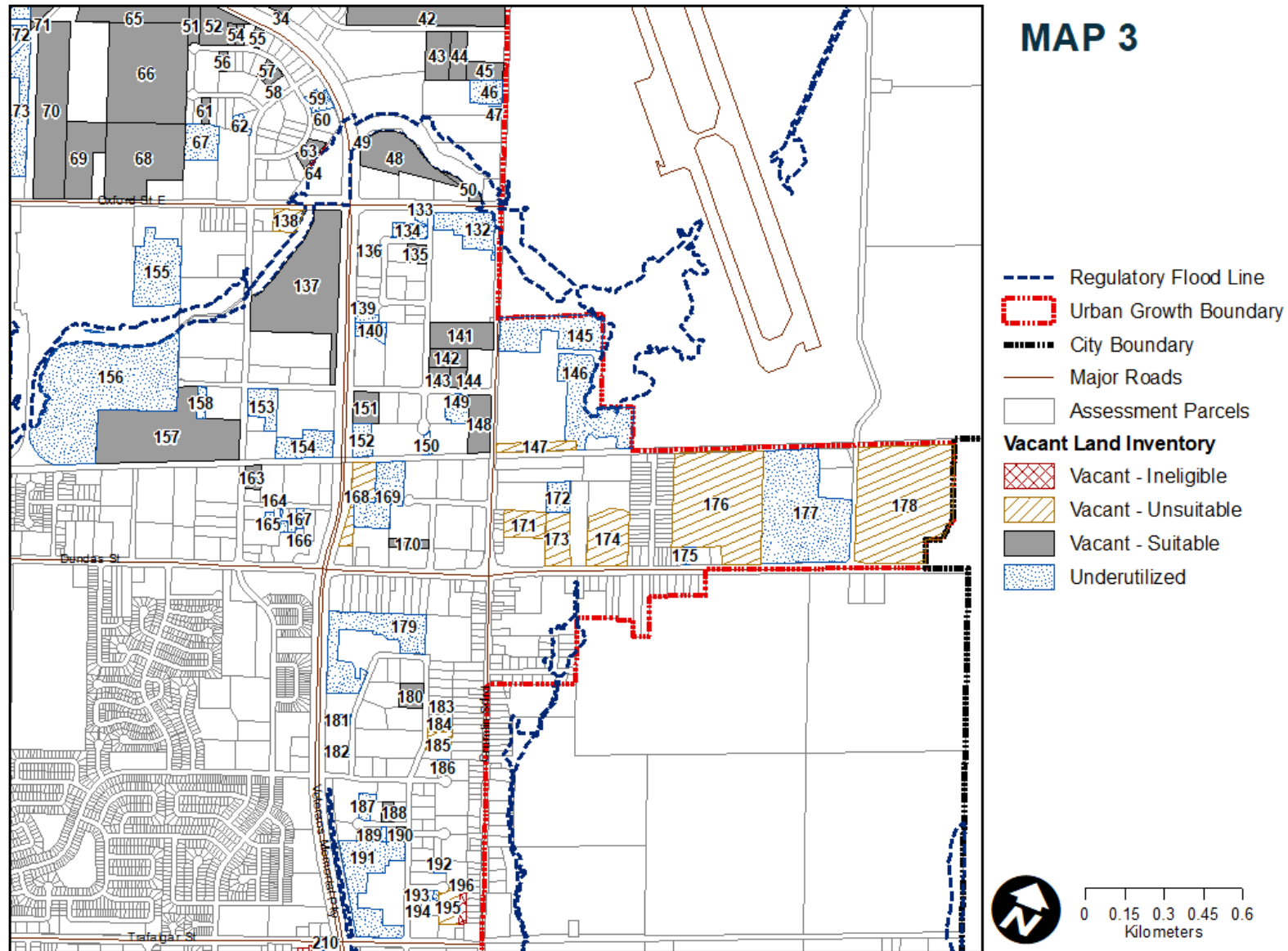
City of London Industrial Vacant Land Inventory



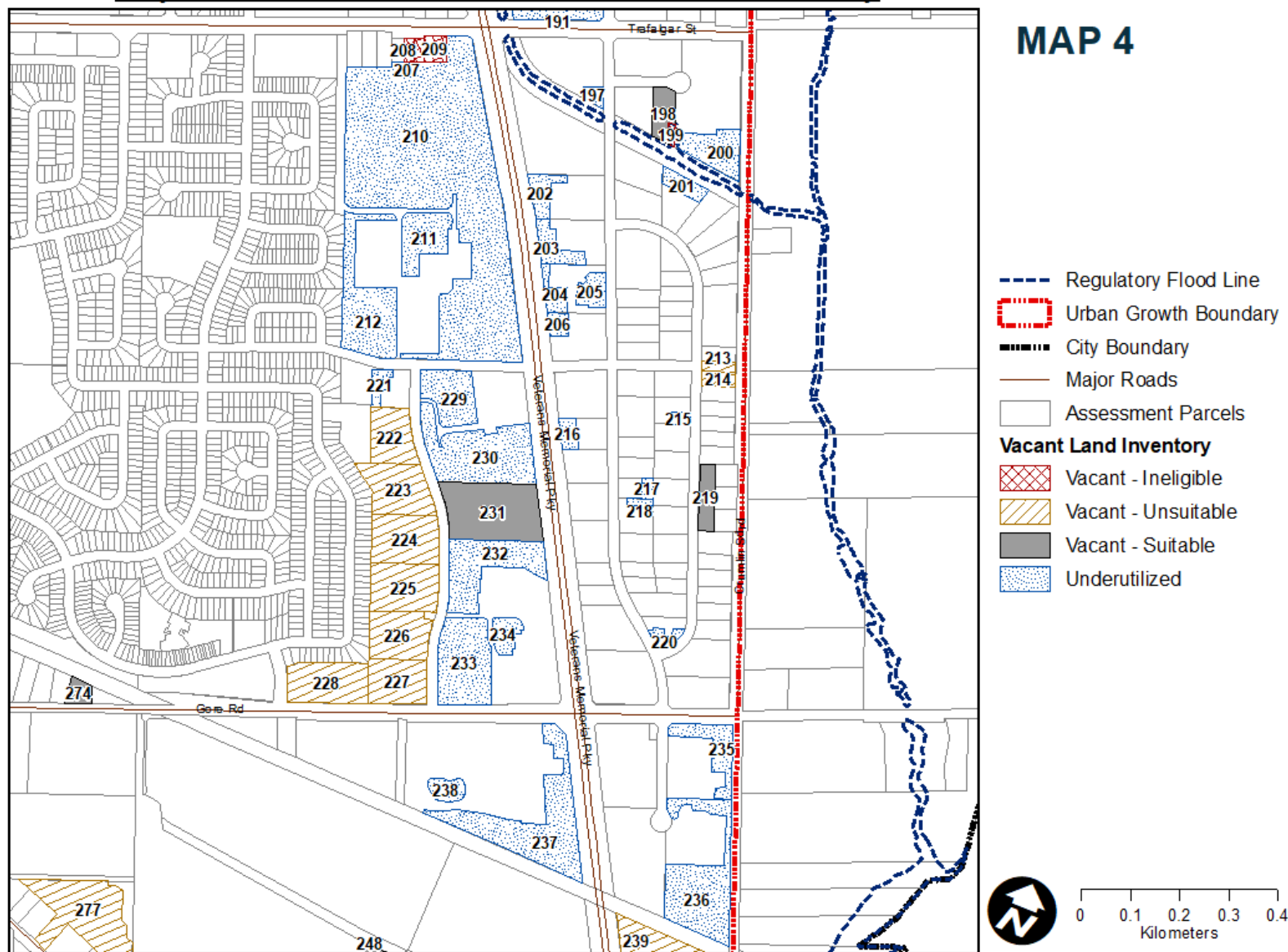
City of London Industrial Vacant Land Inventory



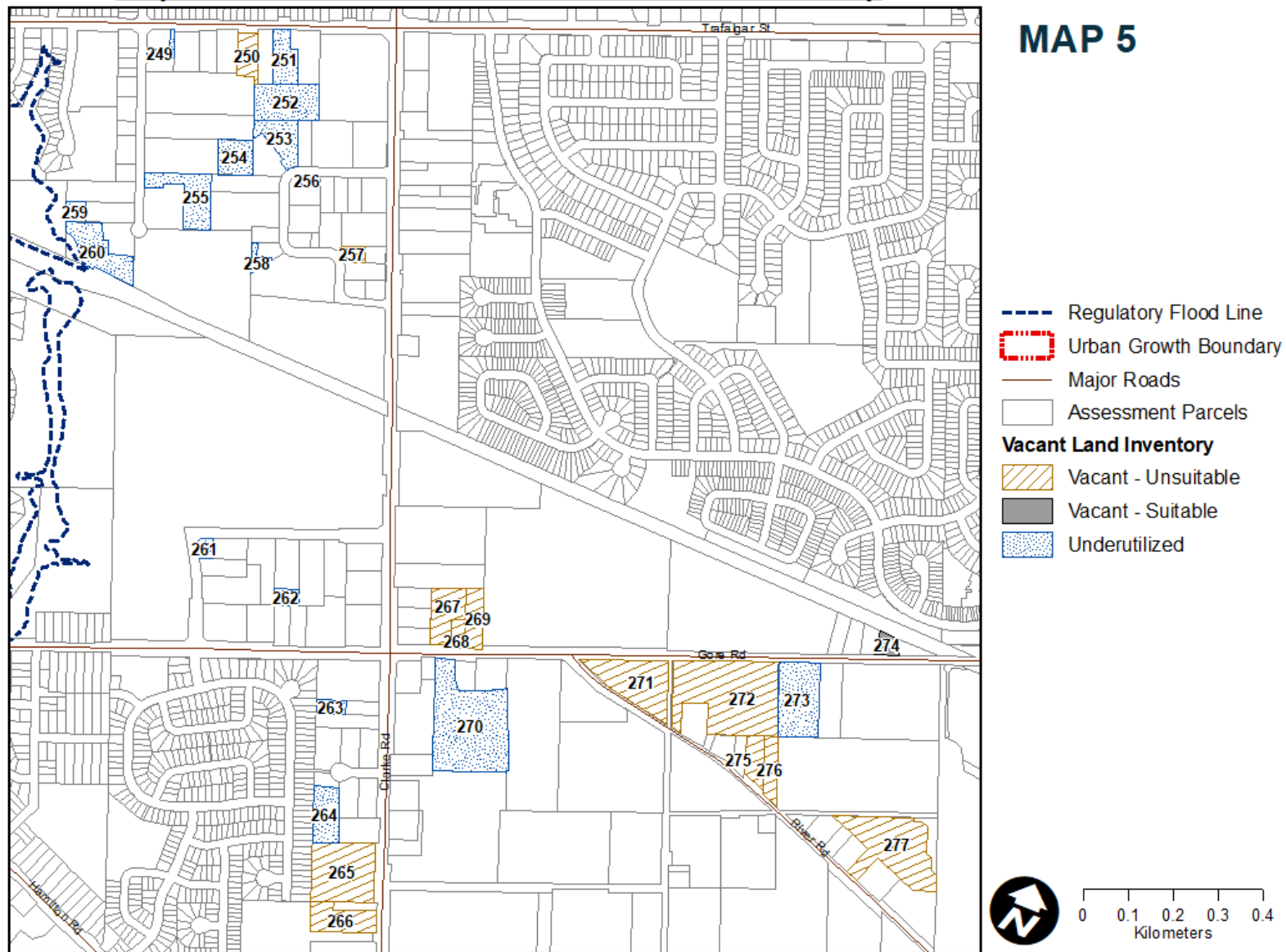
City of London Industrial Vacant Land Inventory



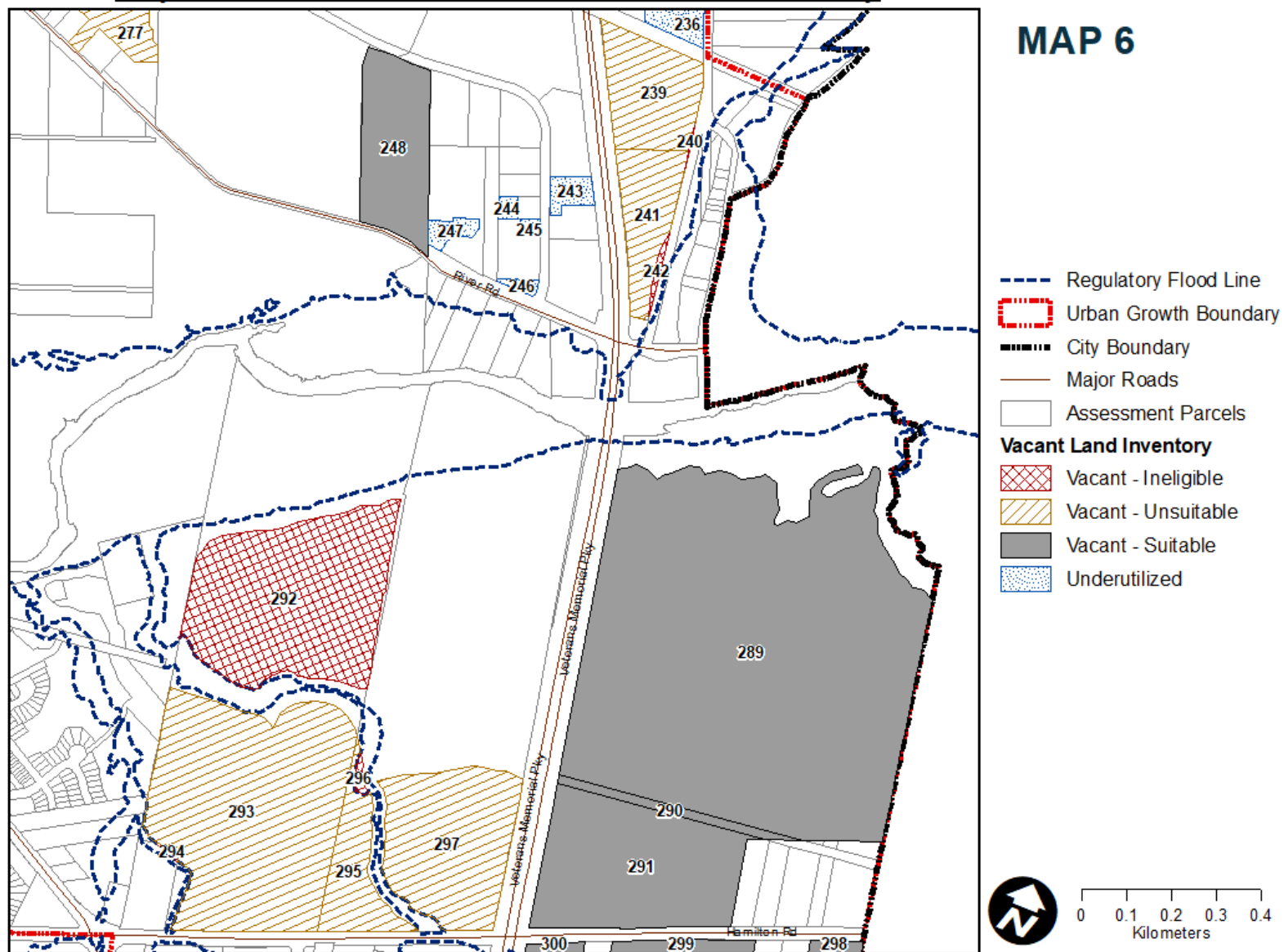
City of London Industrial Vacant Land Inventory



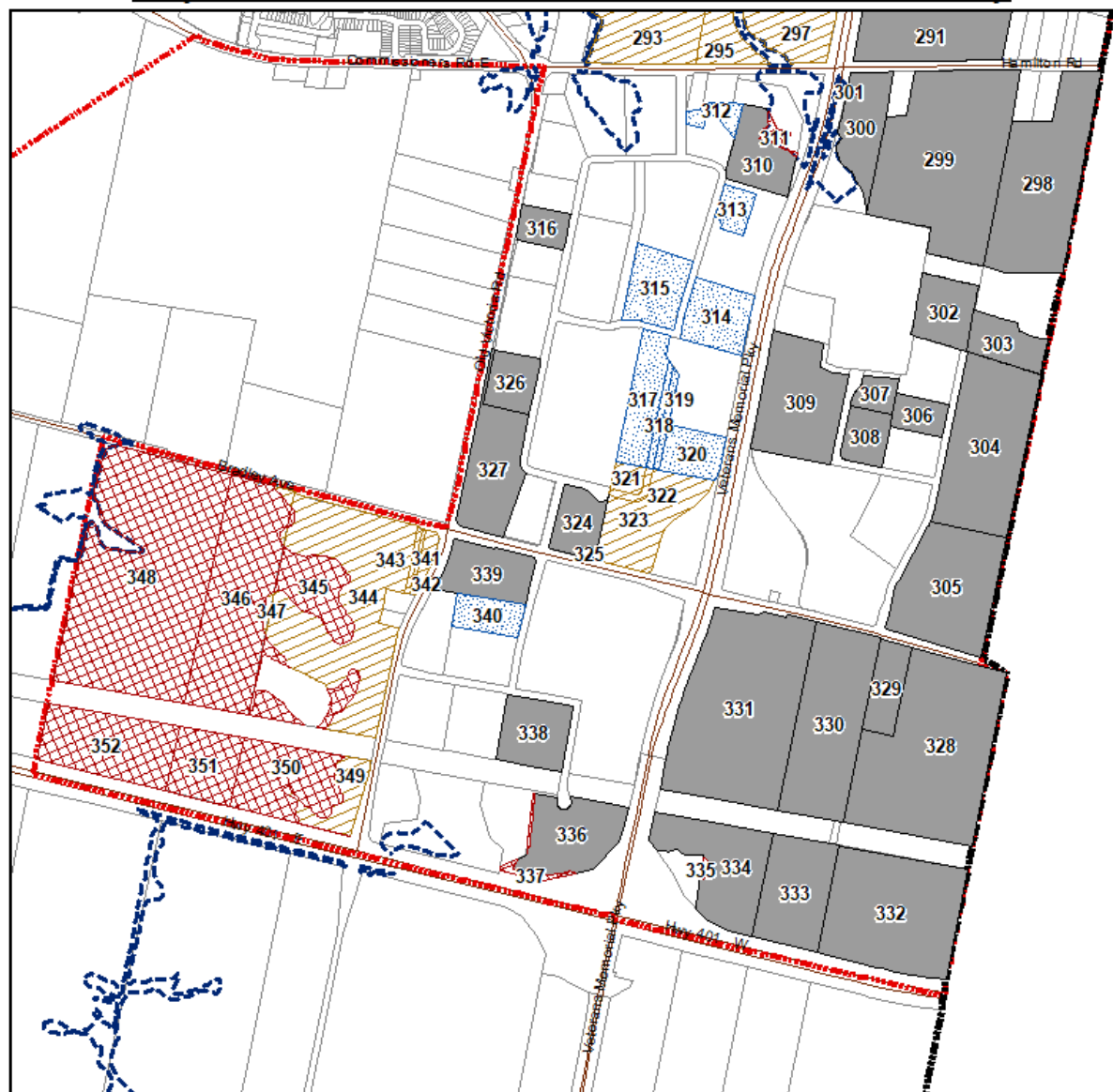
City of London Industrial Vacant Land Inventory



City of London Industrial Vacant Land Inventory



City of London Industrial Vacant Land Inventory



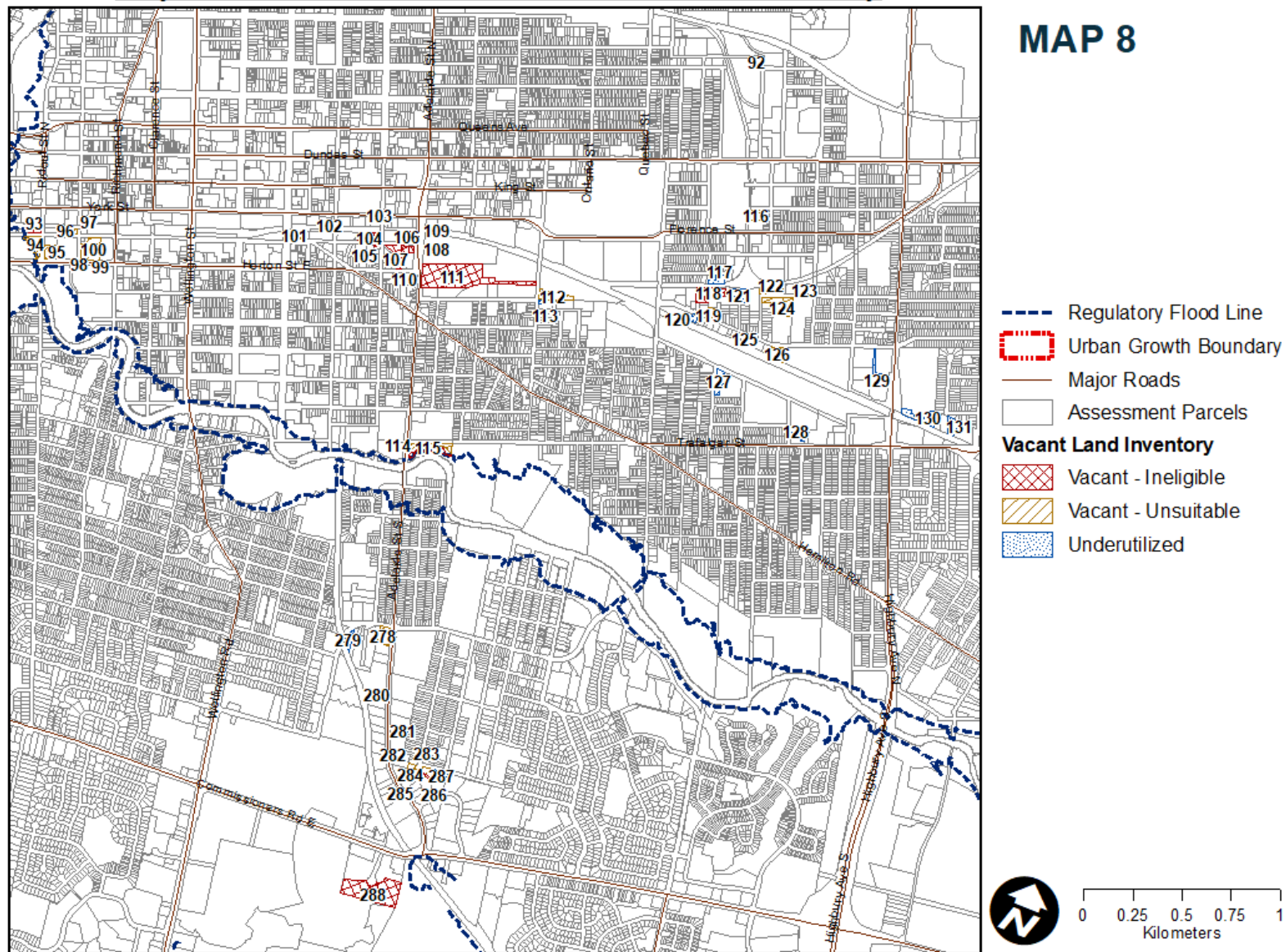
MAP 7

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



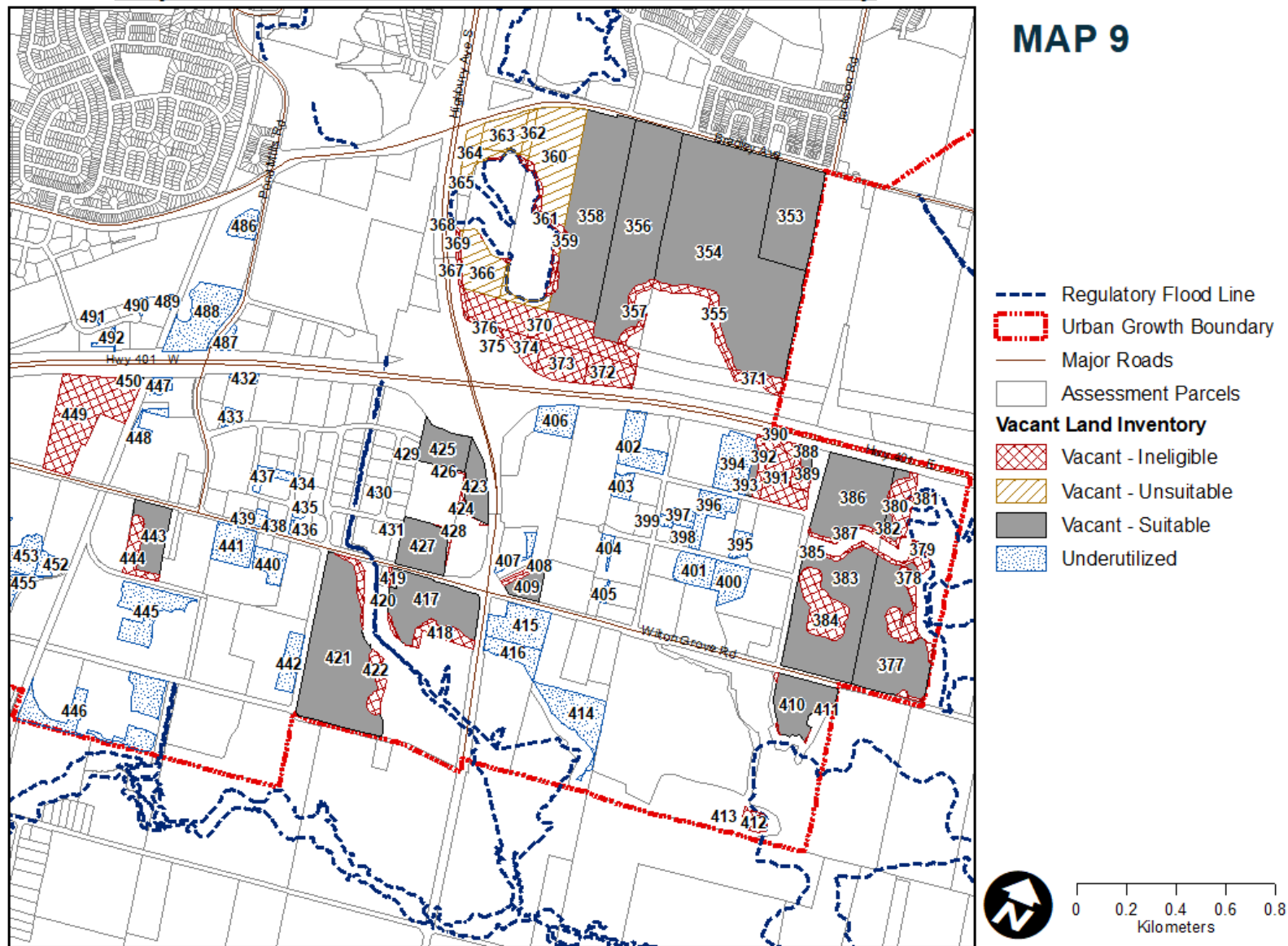
0 0.15 0.3 0.45 0.6
Kilometers

City of London Industrial Vacant Land Inventory



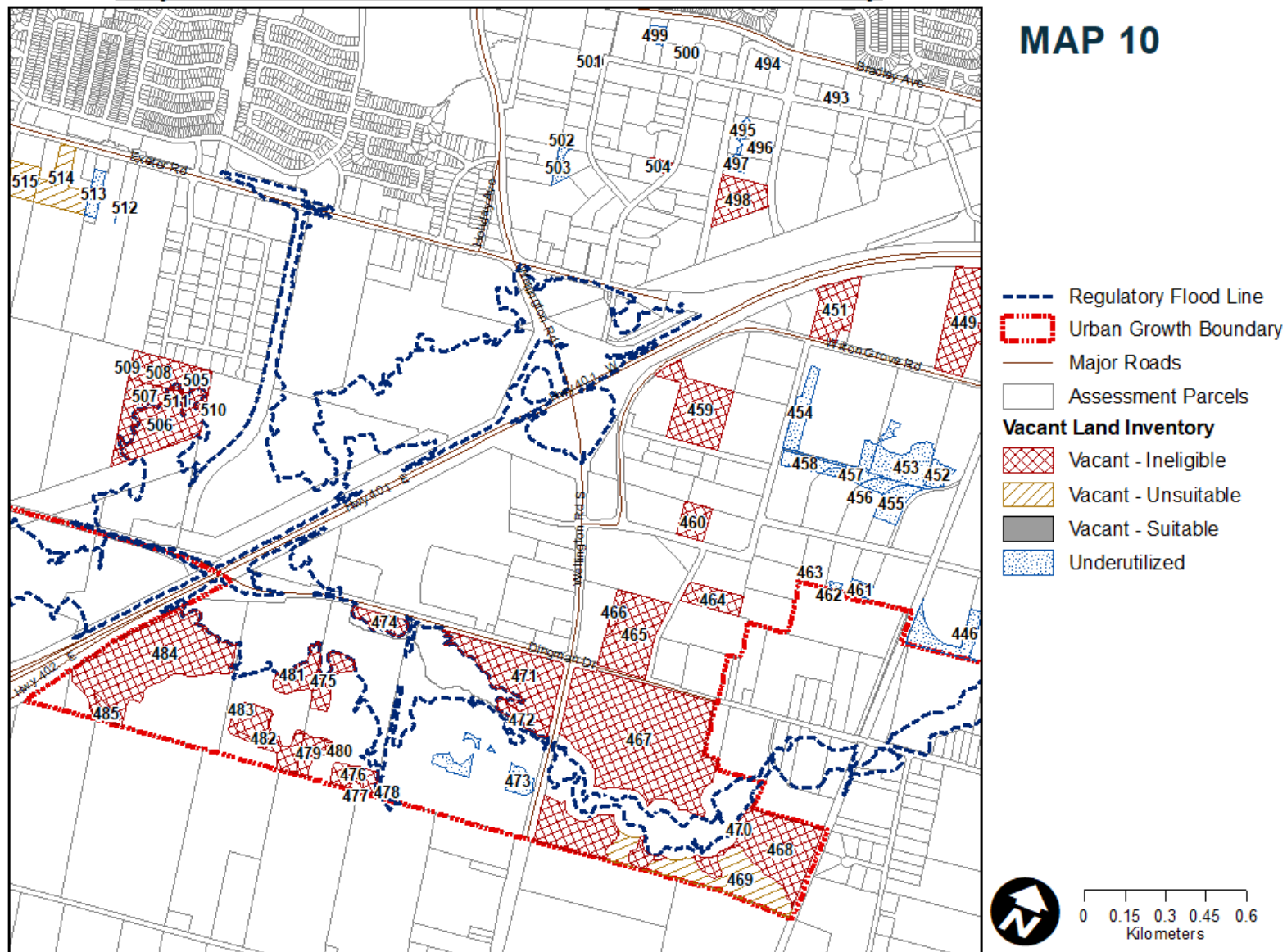
City of London Industrial Vacant Land Inventory

MAP 9



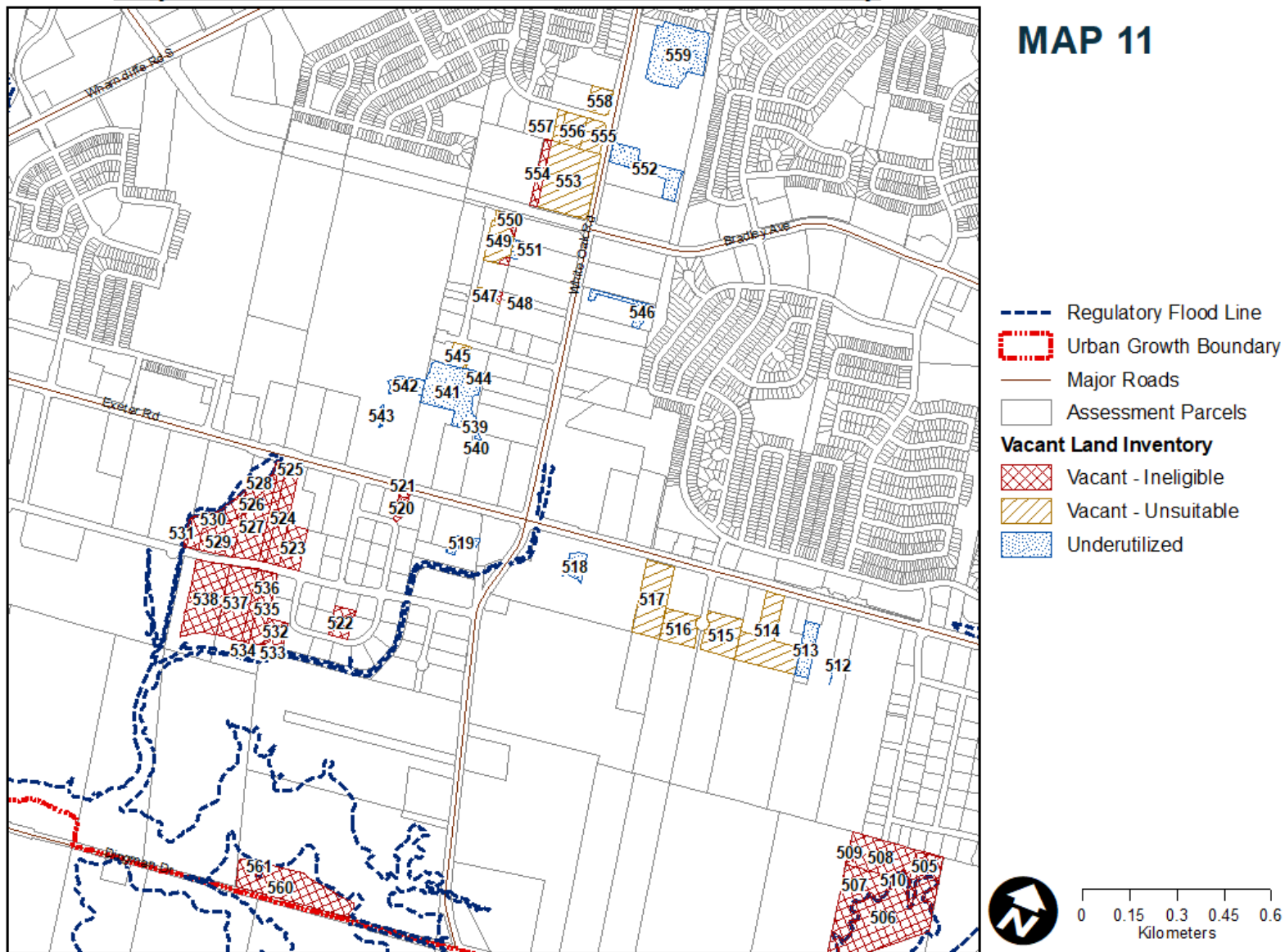
City of London Industrial Vacant Land Inventory

MAP 10



City of London Industrial Vacant Land Inventory

MAP 11



Appendix B – Evaluation Criteria for UGB Expansion Area

Consistent with policies of the *PPS 2024* and The London Plan, below are the criteria for evaluation of candidate industrial properties and blocks of lands to be considered for potential inclusion within an expanded Urban Growth Boundary:

- 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.
- Logical extension of an existing industrial area and/or will be large enough area to accommodate a complete new industrial area (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.

Appendix C – List of Requests for Expansion Area

Below is the preliminary list of sites requested by landowners (or agents) for evaluation for potential inclusion within an Urban Growth Boundary expansion, which have been received as of time of writing of this report.

Requested Property	Applicant / Agent	Category
1620 Fanshawe Park Rd E	Orange Rock Developments <i>[applicant]</i>	Community Growth
3231 Colonel Talbot Rd, 3293 Colonel Talbot Rd, 3323 Colonel Talbot Rd, 7184 Pack Rd, 7220 Pack Rd, 7290 Pack Rd	INCON <i>[applicant]</i>	Community Growth
2425 Old Victoria Rd	Adam Hiemstra <i>[applicant]</i>	Community Growth
1431 Sunningdale Rd W	Ali Jomaa <i>[applicant]</i>	Community Growth
1640 Fanshawe Park Rd E, 2012 Oxford St W	Orange Rock Developments <i>[applicant]</i>	Community Growth
1871 and 1913 Bradley Ave	Alex Sumner <i>[applicant]</i>	Community Growth
1944 Bradley Ave	Elite Bradley Development Inc <i>[applicant]</i>	Community Growth
1996 Bradley Ave	Weston Consulting <i>[agent]</i>	Community Growth
3681 Homewood Lane	Angelo and Brenda Fortese <i>[applicant]</i>	Community Growth
2613 and 2679 Dundas St	Farhi Holding Corporation <i>[applicant]</i>	Community Growth
2106 Fanshawe Rd E, 1885 Fanshawe Park Rd E, 1795 Clarke Rd	Farhi Holding Corporation <i>[applicant]</i>	Community Growth
1739 Sunningdale Rd W	MHBC <i>[agent]</i>	Community Growth
1181-2031 Commissioners Rd E	MHBC <i>[agent]</i>	Community Growth
1701 Fanshawe Park Rd W	Zelinka Priamo Ltd <i>[agent]</i>	Community Growth
300 Crumlin Sdrd	Katie Rudavsky <i>[applicant]</i>	Community Growth
360 Crumlin Sdrd	Gray Angel Holdings Inc <i>[applicant]</i>	Community Growth
2329 Dingman Dr	Gray Angel Holdings Inc <i>[applicant]</i>	Community Growth
2387 Dingman Dr	Brian and Mel Murray <i>[applicant]</i>	Community Growth
2145-2135 Dingman Dr	Woodhurst Farm Ltd. <i>[applicant]</i>	Community Growth
1741 Wilton Grove Rd	Amandeep Bajwa <i>[applicant]</i>	Community Growth
2329 Wonderland Rd N	Corlon Properties Inc <i>[applicant]</i>	Community Growth
2497 Dingman Dr	Corlon Properties Inc <i>[applicant]</i>	Community Growth
1731 Fanshawe Park Rd W	Barbara Comfort <i>[applicant]</i>	Community Growth
2543 Wickerson Road	1000357055 Ontario Inc <i>[applicant]</i>	Community Growth
2624 Jackson Rd	Franco and Annette Bortolussi <i>[applicant]</i>	Community Growth
2017 Bradley Avenue	Drewlo Holdings <i>[applicant]</i>	Community Growth
7390 & 8156 Longwoods Road	Farhi Holding Corporation	Community Growth

Requested Property	Applicant / Agent	Category
	<i>[applicant]</i>	
2465 Westminster Dr	Westminster Trails Inc <i>[applicant]</i>	Community Growth
1962 Oxford Street West	Westdell Development Corp <i>[applicant]</i>	Community Growth
2440 Westminster Drive	Franco Ditrollo <i>[applicant]</i>	Community Growth
120 Gideon Dr	AbdelRahman Lawendy <i>[applicant]</i>	Community Growth
Not Available (GIS ID# 121319 - City Map)	Mor Holding (London) Corporation <i>[applicant]</i>	Community Growth
4866 Wellington Rd S, 3618 Westminster Dr, 3386 Westminster Dr	Hisham Badawi <i>[applicant]</i>	Community Growth
1697 Byron Baseline Road	William L. Derks and Henny P. Derks <i>[applicant]</i>	Community Growth
5371 - 5369-5371 Wellington Rd S, 3287 Westminster Dr, 3298 Scotland Dr	Nathan Caranci <i>[applicant]</i>	Community Growth
3700 Old Victoria Rd, 2214 Wilton Grove Rd, 1811 Wilton Grove Rd, 2471 Wilton Grove Rd, 2034-2094 Wilton Grove Rd, 2338-2350 Wilton Grove Rd	Tommy Faulkner <i>[applicant]</i>	Community Growth
2448 Dundas St E	Westdell Development Corp <i>[applicant]</i>	Community Growth
2001 Sunningdale Rd W	Westdell Development Corp <i>[applicant]</i>	Community Growth
2093 Commissioners Rd E	Westdell Development Corp <i>[applicant]</i>	Community Growth
1720 Sunningdale Road West, 1525 and 1557 Fanshawe Park Road West, 1185 Sunningdale Road West, 1217 Gainsborough Road	Auburn Developments <i>[applicant]</i>	Community Growth
1269 Gainsborough Road, 1992 Fanshawe Park Road W, 1380-1440 Gainsborough Road (two parcels / north and south of CP Rail Line)	Southside Group of Companies <i>[applicant]</i>	Community Growth
2535 Westdel Bourne	Southside Group of Companies <i>[applicant]</i>	Community Growth
1017 Sunningdale Rd W	Issam Thabit <i>[applicant]</i>	Community Growth
4680 Wellington Road South	761030 Ontario Ltd. <i>[applicant]</i>	Community Growth
2556 Wilton Grove Road	Nathan Caranci <i>[applicant]</i>	Community Growth
1803 Bradley Avenue, 3575 Dingman Dr, 2774 Dingman Dr, 2816 Dingman Dr	Gurwinder Mangat <i>[applicant]</i>	Community Growth
1753 Fanshawe Park Road West	Costantinos Ioannidis <i>[applicant]</i>	Community Growth
2760 Dingman Drive	SSP Group <i>[applicant]</i>	Community Growth
1185 Southdale Road West	Lecram Inc. <i>[applicant]</i>	Community Growth
1316 Gainsborough Road	Bellamere Developments Inc <i>[applicant]</i>	Community Growth

Requested Property	Applicant / Agent	Category
1950 & 2140 Sunningdale Road West	West_Maple Lynch Farms & 2725237 Ontario Inc. <i>[applicant]</i>	Community Growth
2426 Wickerson Road	Kape Developments Ltd. <i>[applicant]</i>	Community Growth
9070, 9120 and 9150 Elviage Drive	Bill and Tonya Groenewegen <i>[applicant]</i>	Community Growth
1007 Sunningdale Rd West	Karim Kouta <i>[applicant]</i>	Community Growth
7511 Longwoods Rd	Patzer Homes Inc. <i>[applicant]</i>	Community Growth
1342 & 1420 Tote Road	2158508 Ontario Ltd. & Provo Leasing Inc. <i>[applicant]</i>	Community Growth
5044 Wellington Road South	David Chromczak <i>[applicant]</i>	Community Growth
2690 Westminster Drive	761030 Ontario Ltd. <i>[applicant]</i>	Community Growth
1682 Byron Baseline and 2420 Westdel Bourne	Sifton Properties Limited <i>[applicant]</i>	Community Growth
2166 Oxford Street West	Sifton Properties Limited <i>[applicant]</i>	Community Growth
1896 Sunningdale Road East	Sifton Properties Limited <i>[applicant]</i>	Community Growth
1976 Oxford Street West	Sifton Properties Limited <i>[applicant]</i>	Community Growth
2270 Highbury Avenue North and 2380 Highbury Avenue North	Sifton Properties Limited <i>[applicant]</i>	Community Growth
2133 & 2197 Westdel Bourne	York Developments <i>[applicant]</i>	Community Growth
4570 Westminster Drive	Reid Crinklaw <i>[applicant]</i>	Community Growth
6295 Westminster Drive & 6134 Westminster Drive	Mark and Carol Crinklaw <i>[applicant]</i>	Community Growth
1029 Southdale Road W, 3087 Colonel Talbot Road, 3133 Colonel Talbot Road, 7086 Pack Road, 7056 Pack Road	Old Oak Properties Inc. <i>[applicant]</i>	Community Growth
3219 Westdel Bourne and 3303 Westdel Bourne	Tricar Properties <i>[applicant]</i>	Community Growth
9220, 9246, 9258, 9282 and 9298 Elviage Drive and 1435 Tote Road	Steve Plunkett <i>[applicant]</i>	Community Growth
1424 Southdale Road	Mike Meddaoui <i>[applicant]</i>	Community Growth
3101 Westdel Bourne	Brendan Ryan <i>[applicant]</i>	Community Growth
9320 Elviage Road	Dean Soufan <i>[applicant]</i>	Community Growth
764, 772, 774 Crumlin Sideroad	New London Group <i>[applicant]</i>	Community Growth
4737 and 4763 Col Talbot Road	Joe Fortese <i>[applicant]</i>	Community Growth
7451 Pack Road & 3708 Homewood Lane.	Phil Pattyn <i>[applicant]</i>	Community Growth
1035 Sunningdale Rd. W	Irwin Zaifman <i>[applicant]</i>	Community Growth
4380 Murray Road, 4410 Murray Road, 4519-4557 Colonel Talbot Road, 4638 Murray Road, 4740 Murray Road, 5619 Colonel	Farhi Holding Corporation <i>[applicant]</i>	Community Growth / Employment Areas

Requested Property	Applicant / Agent	Category
Talbot Road, 4798 Murray Road, 4956 Murray Road, 7673 Westminster Drive, 7541 Westminster Drive, 7541, 7527 Westminster Drive, 5246 Cook Road, 5315 Colonel Talbot Road		
3565 Westdel Bourne	Antonio Bagnara [applicant]	Employment Areas
1806 & 1874 Wilton Grove Rd	Tom Grieve [applicant]	Employment Areas
2700 Trafalgar Rd	Stantec [agent]	Employment Areas
4423 Highbury Ave S	Dancor Consultation Ltd [applicant]	Employment Areas
2049-2055 Bradley Ave	2035723 Ontario Limited [applicant]	Employment Areas
754 Westminster Dr (Thames Centre, Middlesex County)	Tommy Faulkner [applicant]	Annexation*
21497 Wonderland Rd. North (Middlesex Centre, Middlesex County)	Peter Stavrou [applicant]	Annexation*
3950 Dundas Street (Thames Centre, Middlesex County)	Dale Sports Ltd. (Golf North Properties) [applicant]	Annexation*

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

Appendix D – Response from Minister of MMAH

**Ministry of
Municipal Affairs
and Housing**

Office of the Minister

777 Bay Street, 17th Floor
Toronto ON M7A 2J3
Tel.: 416 585-7000

**Ministère des
Affaires municipales
et du Logement**

Bureau du ministre

777, rue Bay, 17^e étage
Toronto (Ontario) M7A 2J3
Tél. : 416 585-7000



234-2025-29

January 28, 2025

Scott Mathers
Deputy City Manager
Planning and Economic Development
City of London
smathers@london.ca

Dear Scott Mathers:

Thank you for your letter requesting support for an Urban Growth Boundary expansion of approximately 2,000 hectares of developable land to increase London's supply of new housing. I appreciate the time you have taken to write.

It is my understanding that the Urban Growth Boundary expansion you are contemplating is based on a third-party Housing Supply Marketplace Analysis, which is being assessed by Council in parallel with the findings of a Land Needs Assessment done in accordance with the Provincial Planning Statement (PPS 2024). I also understand that your Land Needs Assessment supports a 1,476-hectare Urban Growth Boundary expansion for community growth and housing over a 30-year planning horizon.

Our government's priority remains to increase housing supply and remove barriers to home construction by ensuring municipalities have sufficient urban lands to meet their current and future housing needs. PPS 2024 provides municipalities with a streamlined and simplified set of criteria for consideration when undertaking Settlement Area Boundary Expansions which can be done at any time, as needed, in response to housing and other land use demands.

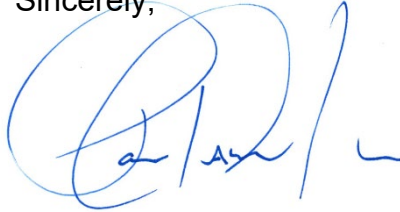
As you know, local municipalities are responsible under the *Planning Act* for making decisions on most land-use planning matters. Regarding the Urban Growth Boundary expansion, it is recommended that the City of London consider all the available information, including adjustments for matters like the local market contingency factor, and make a determination that is in accordance with the policies in PPS 2024.

Ministry staff are available to assist in this process and look forward to reviewing and providing feedback on your draft Official Plan Amendment. Please feel free to contact Ian Kerr, Regional Director – Western Municipal Services Office at ian.kerr@ontario.ca or 519-873-4026 for more information on our one-window land-use planning process.

I look forward to continuing to work with the City of London to ensure that residents in your community have a place to call home, while making it easier to build more homes to address the on-going housing crisis.

Once again, thank you for your letter. Please accept my best wishes.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Paul Calandra', with a large, stylized initial 'P' and 'C'.

Hon. Paul Calandra
Minister of Municipal Affairs and Housing