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City of London Planning Committee and Municipal Council
c/o City Clerks Office
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Request for Industrial Land Conversion Through Land Needs Assessment/Official Plan Review Process

I am submitting this letter on behalf of 1803299 Ontario Inc. who are the owners of the properties outlined in red on Figure 1. They make up approximately 25 acres of land and are occupied by a number of former industrial buildings – including the former Kellogg’s factory on the south side of Dundas Street and the former EMCO factory on the north side.

All of these buildings have been converted to non-industrial uses such as entertainment, office, retail and service uses, which would not meet the new definition of “employment area” under the revised Planning Act and the draft Provincial Planning Statement. One warehouse use remains on these lands (one tenant within the former Kellogg’s factory), which has shown to be highly compatible with the transition of the other spaces over to non-industrial uses.

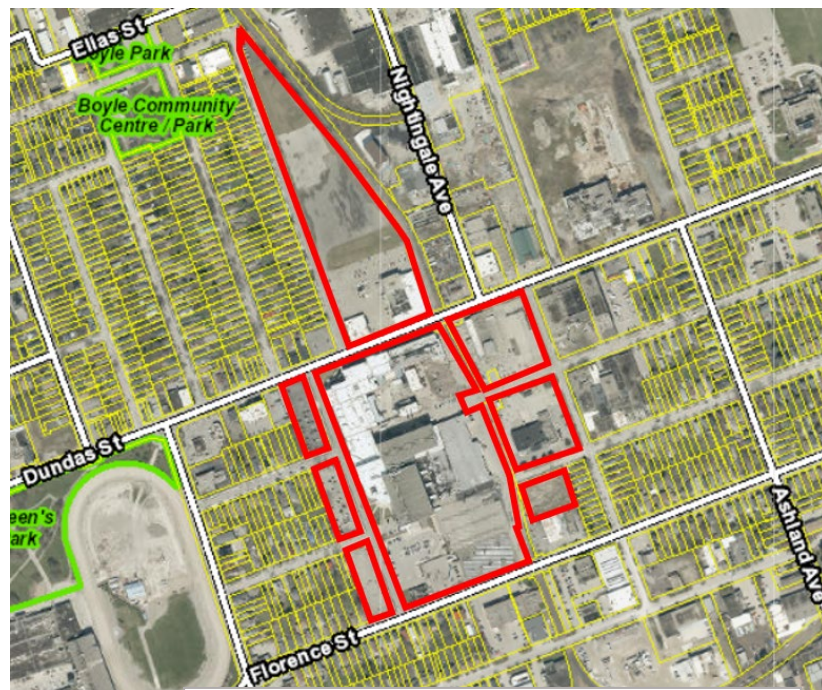
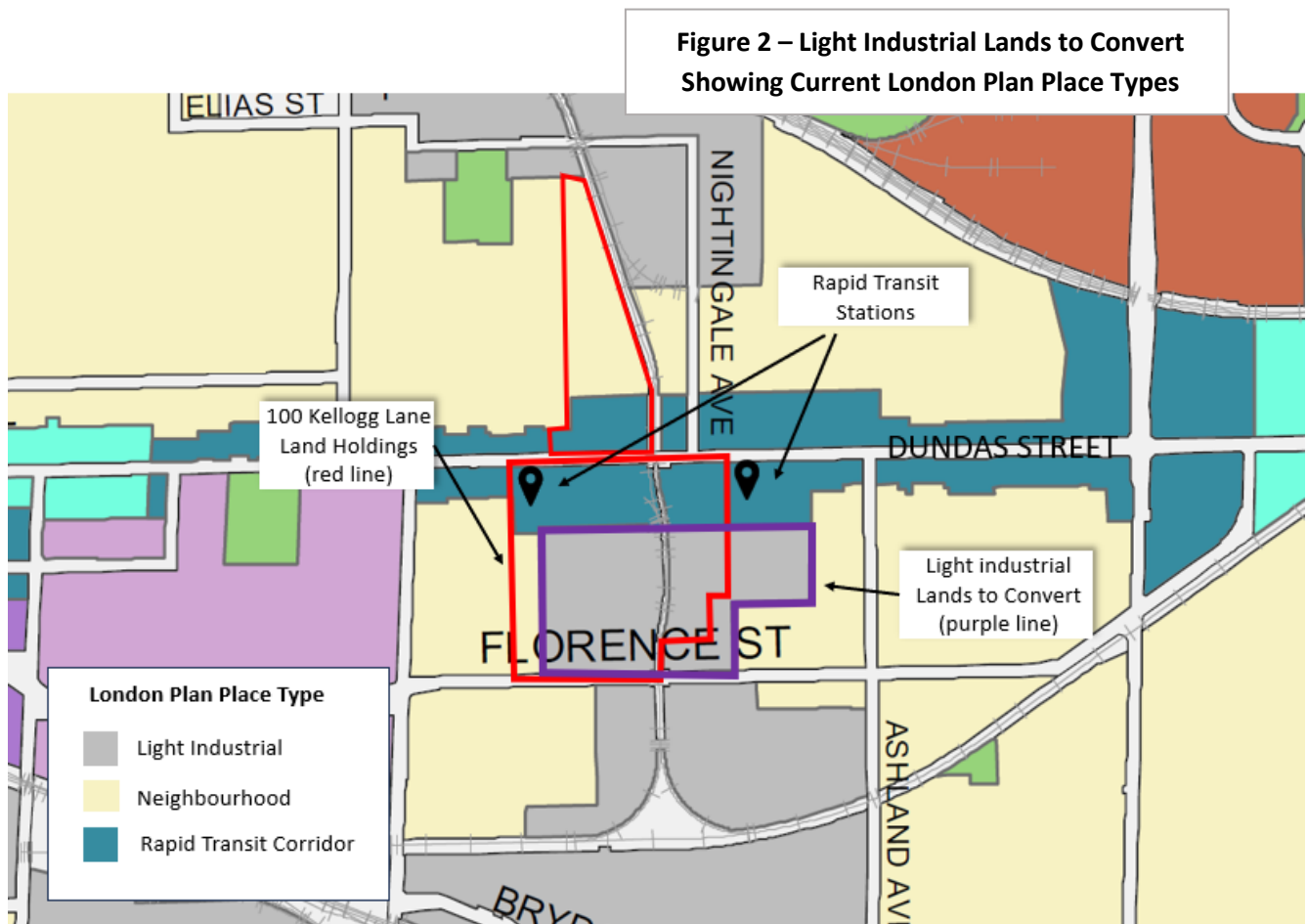


Figure 1 – Lands Owned by 1803299 Ontario Inc.

Official Plan Review Process, Land Needs Assessment and Industrial Land Conversion

It has come to our attention that the City of London intends to launch a review of the London Plan – initially adopted by City Council and approved by the Province in 2016. This process will involve an evaluation of land supply required to meet projected growth needs for the next 25 years. As part of this land needs assessment, we understand that the City will consider whether there are industrial lands in the London Plan that would be better designated for other purposes, such as mixed use residential.

Figure 2 shows the properties owned by 1803299 Inc., overlaid on top of “Map 1 – Place Types” from the London Plan. We are requesting that the Light Industrial lands shown within the purple outline, between Kellogg Lane (west), Dundas Street (north), Ashland Ave (east) and Florece Street (south) be re-designated to recognize the major commercial, office and entertainment uses that have been zoned for and now established on the site and to allow for the future development of a range of intense residential uses.



Existing major mixed-use entertainment and employment centre

A major mixed-use entertainment and employment centre has been established in and around the former Kellogg's Factory, creatively utilizing previously vacant industrial spaces. The hub includes such things as:

- The Factory – Canada's biggest indoor family entertainment centre, including the world's largest indoor ropes course, zip lines, trampoline park, arcade, virtual reality experiences and escape rooms
- The Clubhouse – state-of-the-art indoor sport, dining and lounge experience with multi-sport simulators, minigolf, bocce ball and other gaming areas
- Powerhouse Brewery – making a wide variety of craft beers sold on site and in LCBO locations
- Paradigm Spirits Co – a destination distillery location and restaurant, producing gin, vodka, rum and whiskey
- The Canadian Medical Hall of Fame – sharing the story of excellence in Canada's medical history
- An outdoor courtyard that hosts authentic markets, live music, and various social events.
- An indoor concourse of retail and food spaces within the repurposed Kellogg's Factory
- A large event centre that has accommodated a variety of high-profile events, including the Van Gough Exhibition and the Immersive Disney Animation Experience.
- A variety of different office spaces, including large employers such as Compass Group and CARFAX Canadian headquarters.

The existing businesses and activity in the centre will soon be complimented by exciting new development including such things as:

- The Hard Rock Hotel, currently under construction – with over 160 rooms in Phase 1 and another 200 rooms in Phase 2
- The London Children's Museum – with an average of 80,000 visits per year
- A food hall/ major restaurant, currently under construction

Mixed-use Residential Community

In addition to converted industrial buildings, there are several vacant blocks on the subject lands. Planning is currently underway for an intense mixed-use residential community, with the entertainment centre at its core. The plans call for the development of high-rise and mid-rise residential towers, with a variety of commercial uses integrated into the base of several buildings. The highest intensity of development will occur within or close to the existing Rapid Transit Corridor.

Definition of Employment Area – Planning Act and draft Provincial Planning Statement

We are of the opinion that the subject lands do not meet the definition of an "employment area" as defined by the Planning Act and proposed Provincial Planning Statement. Both of these documents include definitions of "employment area" that exclude office and retail uses unless they are directly associated with an industrial use. The subject lands are almost exclusively used for retail, commercial and office uses that are not associated with specific manufacturing, research and development or warehousing uses. This suggests that these lands should not be considered as an industrial employment area and are ready for re-designation to a non-industrial place type.

Request for Industrial Land Conversion

The purple line in Figure 2 highlights the Industrial Place Type that we believe should be converted to a non-industrial Place Type – allowing for a mix of intense residential, entertainment, commercial and office uses. The following outlines the brief rationale, which will be expanded upon through the upcoming land needs assessment process:

1. The Light Industrial Place Type no longer adequately describes the current or future land uses for this area.
2. These lands have lost their amenity for industrial purposes and are transitioning to a higher order land use. They are surrounded by residential, commercial and office uses, access by truck is limited, and significant congestion at this busy central London location makes them difficult to access.
3. Re-designation of these lands to a non-industrial use may create the opportunity for the City to substantiate the designation of new industrial lands which are more conducive to attracting and retaining valuable industrial employers in London.
4. As noted above, the subject lands do not represent an employment area as defined by the Planning Act.
5. As noted above, the majority of this area has already been converted from industrial to non-industrial uses and the Place Type designation should reflect this (ie. major retail, entertainment, office and service uses).
6. As shown on Figure 2, these lands are bracketed by rapid transit stations. A new designation to support intense forms of residential development, together with a mix of office, retail and service commercial uses would take advantage of those stations and drive ridership for rapid transit.
7. As shown on Figure 2, there are Neighbourhood Place Types on either side of the lands currently designated Light Industrial. The proposed conversion would remove the Light Industrial “wedge” between these two communities and allow for a meaningful reconnection of these neighbourhoods.
8. There is an undersupply of housing in London and the development of these lands for residential purposes will allow for construction of a significant number of housing units that could meaningfully affect supply.
9. Housing development at this location would be consistent with the 15 Minute City concept, whereby the majority of the daily needs of residents would be offered within a 15-minute walk, ride or transit trip.
10. A significant amount of municipal infrastructure – transit, roads, sewer, water – have been constructed in this area and the proposed changes would take advantage of this costly infrastructure much more effectively.
11. Additional housing on the subject lands will offer support for continued revitalization the Old East Village and the Dundas Street Commercial Corridor.

Summary

The Light Industrial Place Type no longer represents the existing or future land uses on the subject lands. We are requesting that the Place Type be changed through the Official Plan review process, so that it supports the existing entertainment, office, retail and service commercial uses in addition to a range of intense residential uses to be developed in the near future. Doing so would allow for a better use of the land that takes advantage of existing servicing infrastructure, supports rapid transit, creates complete communities and offers the opportunity for a substantial supply of new housing within an existing urban area of London. Furthermore, re-designating these lands to a non-industrial land use may “open the

door” for establishing new industrial lands elsewhere that are more conducive to attracting industrial employers to London.

We look forward to participating in the upcoming land needs assessment process and we would appreciate the opportunity to work with Planning Staff and provide a more complete planning analysis in support of this industrial land conversion at a future date.

Thank you very much,

A handwritten signature in black ink, appearing to read "John Fleming". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Fleming".

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cc: Len Leith – Commercial and Industrial Project Manager -100 Kellogg Lane