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March 18, 2024

City of London
300 Dufferin Avenue
London, ON, N6A 4L9

Attention: Members of Planning and Environment Committee

**RE: City of London: Official Plan Review of The London Plan and Land Needs Assessment Update
(Employment Lands Conversion) File Number: O-9595**

To Members of Planning and Environment Committee,

Please consider this letter as a summary of comments regarding recommended conversion of Employment Lands as part of the on-going Official Plan Review and Land Needs Assessment Update.

Lands Needs Assessment

It is in our opinion that recommendations for employment land conversions should not take place until after completion of the ongoing Official Plan Review and Land Needs Assessment (LNA). It is our understanding that the LNA will include Industrial, Commercial, Institutional and Residential land needs. In addition, the Staff Report does not thoroughly analyze the existing servicing and infrastructure capacity for each of the recommended conversions. As such, it is premature to recommend employment lands for conversion when it is not known if the City has sufficient land inventory to meet identified growth forecasts. Further, it is our understanding that the Industrial Land Development Strategy (ILDS) from March 2014 was utilized to evaluate the properties identified in the Staff Report. It is in our opinion that the ILDS should be updated to reflect current data since this is an outdated document which informs and directs decisions recommended in the Staff Report.

Employment Land Conversions

Based on our review of the Staff Report, it is understood that Staff have identified three (3) properties recommended for conversion from an Industrial to Non-Industrial Place Type. Sifton has concerns with the following recommendations.



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1525, 1557, 1579 and 1635 Fanshawe Park Road West

The above noted lands recommended for conversion from Commercial Industrial to Neighbourhoods Place Type, contains existing commercial industrial uses. For the lands within the northern portion of 1635 and 1579 Fanshawe Park Road West (designated Neighbourhoods Place Type) to redevelop for residential uses, the existing commercial industrial uses could no longer continue to operate. The lands within the northern portion 1557 Fanshawe Park Road West are designated as Farmland and located outside of the current urban growth boundary. As such, these lands, in their present state, could not be utilized to support residential development within the northern portions of 1635 and 1579 Fanshawe Park Road West.

Further, we have concerns with the analysis prepared for these lands as outlined in Appendix A. It is noted that the re-designation from Commercial Industrial to Neighbourhoods Place Type would not preclude continued operation of the existing industrial uses. It is our interpretation that the existing land uses would not be permitted within the Neighbourhoods Place Type and would therefore be deemed non-conforming. Additionally, it is noted that the property does not demonstrate significant environmental constraint for re-use. Understanding existing operations include a car rental agency and vehicle storage, soil and/or groundwater contamination is possible in this location in which case a Phase I and II Environmental Site Assessment should be completed to determine potential impacts.

York Street Commercial Industrial Corridor between Maitland Street and Rectory Street

The above noted lands have been recommended for conversion from Commercial Industrial to Urban Corridor Place Type. In review of policies of the Urban Corridor Place Type, it is understood, per Policy 837_, that a range of residential, retail, service, office, cultural, recreational and institutional uses may be permitted. Further, mixed use buildings will be encouraged. Residential uses may be permitted to a standard maximum height of 8 stories or upper maximum height of 10 stories.

It is to be noted that the majority of the properties as identified on Map 5 of the Staff Report, back onto the CN Rail Line that runs east/west along the south property line of these parcels. Per Section 3.3 of the Guidelines for New Development in Proximity to Railway Operations, prepared by the Federation of Canadian Municipalities and the Railway Association of Canada, the standard recommended building setback for new residential development in proximity to railway operations is 30 meters (m) for a principle main line. This 30 m setback is to be measured from the mutual property line to the nearest face of the building to ensure that the entire rail right of way is protected for potential rail expansion in the future.

The analysis prepared as outlined in Appendix A of the Staff Report with respect to these lands identifies that the property has sufficient depth/area to meet guidelines for development of sensitive uses in adjacency to



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railway operations. Per Map 5 of the Staff Report, a number of the properties inclusive of 485-551, 575-623, 639, 675 and 679 York Street are quite shallow, ranging from 45-75 m in depth, and therefore, would not have sufficient area to provide for the necessary 30 m setback as well as other required development setbacks.

Further, it is identified that there is suitability/affordability of municipal servicing without significant constraints. It is understood by Sifton that the City is undertaking a review of available servicing capacities of existing infrastructure within the Downtown to confirm suitability for intensification. It is in our opinion that recommendations for land use conversions to support a greater level of intensity should run in tandem with confirmation of sufficient servicing capacities within existing systems.

In our opinion, it is imperative that market analysis be completed to confirm the need and suitability of these sites to accommodate future residential demand and meet projected growth forecasts over the 25-year planning horizon.

In summary, we respectfully request the following:

1. That members of committee re-consider Staff's request to re-designate the above noted lands from an Industrial to Non-Industrial Place Type;
2. That members of committee request the Industrial Land Development Strategy (ILDS) be updated from the 2014 version with relevant data; and
3. That members of committee consider deferring conversion of Industrial Lands to a Non-Industrial Place Type until completion of the Land Needs Assessment including a full servicing and infrastructure capacity review.

We appreciate the opportunity to submit comments.

Sincerely,

Sifton Properties Limited

Lindsay Clark, BES
Manager, Planning and Development

Cc: Phil Masschelein, Senior VP Neighbourhood Developments, Sifton Properties Limited

