



Stantec Consulting Ltd.
600 - 171 Queens Avenue, London ON N6A 5J7

July 18, 2014
File: 1614-01246

Attention: Committee Chair and Members of Committee

Planning and Environment Committee
Corporation of the City of London
300 Dufferin Avenue
P.O. Box 5035
London ON N6A 4L9

Dear Chair and Members of Committee,,

Reference: Greenhills Shopping Centres Ltd., OZ-8324, Public Participation Meeting July 22, 2014

This letter is with reference to Item #30 on the Planning and Environment Committee Agenda for July 22, 2014. We are writing on behalf of our client, the Aarts Group of Companies who own the land located at 17 and 31 Exeter Road. This site is on the west side of Wonderland Road immediately opposite the Greenhills property. The Aarts property and the Greenhills property are both located within the Wonderland Road Community Enterprise Corridor (WRCEC) and both are subject to a cap on permitted office and commercial building area. While we wish to state at the outset that we are not opposed to the development of the Greenhills property, we are concerned with the direction of this application. If this application is approved, it will use up the remaining commercial allocation in the WRCEC and a significant portion of the office allocation. This action will greatly reduce the development potential of the Aarts property and affect the integrity of the Wonderland corridor.

On April 29, 2014, the Ontario Municipal Board approved the City of London long term vision and policy framework for the WRCEC through the Southwest Area Plan (SWAP). This planning exercise is the result of significant review, analysis and consultation over several years. The intent for the WRCEC is *"to provide for a wide range of large scale commercial uses, medium scale office development, high density residential uses, and institutional uses. Both stand-alone and mixed-use developments are permitted."* (Policy 20.5.6.1).

Our client was a party to the OMB hearing in order to maintain their designation and place within the WRCEC. As there was no certainty until the Board decision was rendered, our client awaited that decision before moving forward with their development plans. Following the board decision, our client has been undergoing market research with the intent to create a high quality, mixed use development at this important focal node.

The Southwest Area Plan states within *Policy 20.5.16.8 Fair Distribution of Responsibilities and Resources*:

"The successful completion of the Southwest Planning Area depends on the co-operation of the owners and land developers to share in the equitable and fair distribution of commercial uses, residential density, affordable housing, unit types, community park /ands, community



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facilities, affordable housing, open space, tree canopy cover, municipal infrastructure, etc. as required by this Plan. All Official Plan, subdivision, Zoning By-law amendment and site plan applications shall be required to include a statement of conformity with the requirements of this Plan, as part of a complete application."

The Southwest Area Plan also has specific polices for 17 and 31 Exeter Road found in Section 20.5.6.5. The plan clearly indicates that the function and purpose of these lands is as follows:

Policy 20.5.6.6 ii

"The property known as 17 and 31 Exeter Road is located at the southwest corner of two major arterial roads (Exeter Road and Wonderland Road) within the Southwest Area Plan. The intersection of Exeter Road and Wonderland Road is identified as a Focal Node in the Southwest Area Plan. The land uses on these properties will contribute to the function of the Focal Node as a gateway to the Southwest Area of London and the Wonderland Road Community Enterprise Corridor, as well as provide a transition from other areas, such as the Lambeth Community, to the uses located within the Wonderland Road Community Enterprise Corridor while supporting the Wonderland Road Community Enterprise Corridor uses. "

"The lands will develop as a mixed use area through a comprehensive planned approach. Development on the lands may include a range of land uses including mixed use buildings with ground floor retail commercial, free standing high density Southwest Area Plan residential buildings, free standing office buildings, free standing institutional buildings and some smaller scale free standing commercial buildings including automobile oriented commercial buildings. "

iv) Permitted Uses

- a) *Commercial/institutional land uses including but not limited to retail commercial uses; service and repair establishments, food stores; convenience commercial uses; personal and business services; pharmacies; restaurants; financial institutions; professional and personal service offices; entertainment uses; galleries; studios; automobile oriented commercial uses; community facilities such as libraries and day care centres.*
- b) *Office Uses*
- c) *High Density Residential Uses*
- d) *Mixed Use Buildings that include two or more of the following uses: Office Uses, Residential Uses, Commercial Uses, Institutional Uses*



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v) Special Use Provisions

- a) No individual commercial use on these lands is to exceed 2,800 square metres gross floor area. (30,139 square feet).*
- b) Mixed use commercial/office/ residential buildings shall not exceed 75 residential units per hectare and a maximum height of 4 storeys.*
- c) High density residential buildings shall not exceed 150 residential units per hectare and 10 to 12 storeys in height*

Based on the above specific policies for 17 and 31 Exeter Road, there is a clear intent to develop portions of these lands for commercial uses. In addition, the staff recommendation does not address the overall policy 20.5.16.8: *Fair Distribution of Responsibilities and Resources* and we do not believe that it is in the public interest or in conformity with Policy 20.5.16.8 to allocate approximately 20 years of commercial development within 2 months of the Board decision. In our opinion, this is contradictory to the intent, purpose and policy framework of the Official Plan.

Additionally, and on review of the proposed site plans submitted by York Developments and Greenhills, it is apparent that both of these developments are intended to be developed as large format regional commercial nodes. It is our opinion that using all of the commercial allocation for a singular format of commercial development does not constitute good planning. Our client's application, in particular, envisions a mix of uses including ground floor commercial and auto-oriented commercial which is lacking in both the York and Greenhills plans. Proceeding with approval of the Greenhills plan precludes a proper mix of commercial uses in this corridor.

If this application is approved, all other proposed developments which propose to implement the Official Plan would be limited to land uses of residential and some office but no commercial.

Summary

In summary, we wish to be clear that our client does not oppose the development plans of Greenhills. In fact, they support the opportunity and the economic development that this application represents for this area of London. They do however have serious concerns regarding the allocation of the commercial and office space to this development as it affects the ability of the property at 17 and 31 Exeter Road to develop. It is surprising to us that the staff report recommends allocating all of the commercial development potential in the WRCEC a mere two months after the board decision and before a single building has even started construction.

We respectfully request that the application before the Committee be deferred so that staff, the applicant and other stakeholders (including our client) can have the opportunity to determine the fair distribution of commercial and office uses.



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We also request that our client be consulted on the design of the site plan as the proposed entrances along Wonderland Road will impact our client's development plans and will have significant impact upon the development potential of their property.

Regards,

STANTEC CONSULTING LTD.

Krista Walkey, BA, MCIP RPP
Senior Planner
Phone: (519) 575-4133
Fax: (519) 579-8664
krista.walkey@stantec.com

Attachment

c. Mr. Kevin Aarts

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