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I see that the "Faulkner Family", of 3700 Old Victoria Road, London, is on the agenda for the September 23 PEC meeting. I understand that you will be attending the meeting on your own behalf. Hopefully, staff will be proposing to eliminate the expansion east of your property. If not you will be on the record and able to submit an appeal.

I have written to the Laidlaws to confirm my understanding (received through you) that staff are making an amendment which will satisfy their concerns. I do not have any information with respect to the two other owners listed on the agenda: Grieve and Plutino.

If the document placed before the committee is satisfactory to you, that will hopefully be the end of the matter, however, you should make a written request to receive notice of the OPA in the form adopted by the Council. This is advisable because sometimes changes, not discussed at a public meeting, are made at the Council meeting.

If the proposed OPA is not to your satisfaction, please contact me and we can discuss the advisability of an appeal. The time for making an appeal is 20 days after notice of adoption has been mailed out by the City Clerk. That is why you want to be sure that you are on the mailing list.

As you know, I try to avoid PEC meetings like the plague. Unfortunately, I have been to the last two of them (the first was a marathon, last week wasn't too bad because they were nearly on schedule).

Last week my attendance at the PEC was on behalf of Sifton, in connection with a proposed change to the designation of certain land south of Exeter Road and east of White Oak Road. There is about 230 ha of land affected by the proposed OPA and interestingly, the change is out of an industrial land-use designation. Staff say that this land is not suited to current industrial land requirements. They are recommending that the designation be changed to urban reserve-community growth, a change which I termed "unusual", because it is actually a down designation from a procedural standpoint.

The urban reserve designations apply to land within the settlement area boundary, but they are very much a holding arrangement, because they allow only existing uses until further planning study has been completed. What was even more surprising was that many of the affected owners, particularly Bluestone, supported the proposed change, putting their own land that is already designated end zone for industrial use, into limbo. That is how desperate private owners are to escape from the industrial land-use designations. There is no private sector market for this land because the city controls the acquisition, planning and sale of industrial land at prices which the private sector could not possibly match.

In my comments on behalf of Sifton, I suggested to the committee that the proposed removal of

213  
industrial land (also known as, "employment land" in provincial policy terms) had not been justified on the basis of a comprehensive review, as required by the PPS. I said that the recommendation for removal appeared to have more to do with the settlement area expansion proposal that was scheduled to return for committee consideration at the September 23 meeting. Staff actually confirmed the connection. Both Mr. Fleming and Mr. Barrett said that this is the approach which Ministry staff had recommended to them (that is, that they should take out unwanted industrial land from the City's inventory of industrial land, so that this inventory would fall below the provincial maximum). A tad artificial, no?

In any event, at the PEC meeting, Councillor Polhill was wise enough to see that changing the designation of industrial land in the White Oak area to other land-use designations, would inflate already high inventories for those other land use categories, particularly the residential category, and would preempt the possibility of additions to the settlement area for residential purposes in the east part of the city. To make matters worse, he also wisely predicted that the suitability of the White Oak land for residential purposes had not been established. Staff are proposing to undertake a secondary plan process to consider future land uses in the southern White Oak area. That study will come hard on the heels of the Southwest area plan (the SWAP). The ink is hardly dry on the OMB order approving the SWAP.

The bottom line, for your purposes is this. One of the objections identified in the correspondence which I drafted for you was that an expansion of the settlement area could not be justified for industrial or any purpose due to an oversupply of land in all categories. Staff believe that they have eliminated this objection in a manner that would be supported by MMAH staff. I think this conclusion is suspect for three reasons:

1. The oversupply of industrial land has not been eliminated yet. The expected White Oak OPA is subject to the possibility that there will be appeals to the OMB. That is possible because a number of parties made oral or written submissions in connection with the proposal. My estimate is that there will be at least two appeals.
2. Whether or not the proposed reduction in the industrial land inventory would attract support of Ministry staff, such conclusions are both premature and inconsistent with the intent and purpose of provincial policy restrictions on the addition of settlement area land. Moreover, inflating the inventory of other land-use designations by including the White Oak land will have unlooked for impacts on the city's ability to properly plan for those uses.
3. And thirdly, quite apart from the provincial restriction on adding settlement area land in excess of provincial limits, the proposed location to the east of you is simply the wrong place. It is the wrong place for the reasons that we have previously discussed, including: it is detached from other industrial lands in all material respects, it will generate traffic past the farm gate, it will increase the potential for conflict between agricultural and nonagricultural uses by maximizing the boundary between these uses. There is simply no need for any of these things.

If you require any further information about this background, please contact me. Staff may have a package that will be attractive to you, but that would be a surprise. What I don't want is for you to be surprised about the actions they have taken to try to ditch excess industrial land in favor of the proposed addition next to you. They are really putting the ox behind the cart in this case.

Rest regards,