



Planning Services
206 Dundas Street
London, ON
N6A 1G7

London
CANADA

FILE COPY

December 19, 2104

Middlesex County, Planning Services
399 Ridout Street North
London, ON N6A 2P1

Attention: Durk Vanderwerff, Manager of Planning

Re: City of London Comments, Municipality of Thames Centre Official Plan

Dear Mr. Vanderwerff:

Please accept the following as comments from the City of London regarding the Municipality of Thames Centre Official Plan (Official Plan Amendment No. 12) that was recently adopted by Municipal Council. Please note that the City previously provided comment on March 12, 2014. These previous comments are attached for reference. In general, the City has few comments regarding the amendment, except for our previously noted concerns regarding the identification of new lands for industrial development.

In review the adopted amendment, it would appear that there were no revisions to the redesignation of Agricultural lands to Rural Industrial, particularly the addition of approximately 140 ha. adjacent to the Donnybrook Business Park north of Highway 401 at the Westchester Bourne interchange. While the City acknowledges that the additional lands have been identified as a result of the redesignation of lands previously intended for industrial development to other land uses, the addition of this much land for future industrial purposes without the requirement full municipal services is inappropriate. The City of London is undertaking a similar exercise to identify opportunities for industrial development along the 400 series highway corridors, however any such expansion would be subject to full municipal servicing, consistent with the Provincial Policy Statement, 2014 that would direct growth and development to settlement areas on full municipal services. No such requirement exists in the Official Plan for the Municipality of Thames Centre as it relates to these lands, however we note the revised Section 1.5 (11) Purpose of the Plan that added the following:

"establish policies to ensure a logical and orderly pattern of development in accordance with the servicing capabilities of the Municipality with the intent that new development is generally to occur on full municipal services" (emphasis added).

We also note that this addition represents much more than a 20 year land supply for industrial development, based upon the Municipality's growth estimates and land needs.

The Corporation of the City of London
Office: 519-661-4980
Direct Line: 519-661-2500 ext. 4652
Fax: 519-661-5397
gbarrett@london.ca
www.london.ca

Finally, in its comments of March 29, 2014, the City suggested that a new policy should be included for these new industrial lands limiting permitted land uses to industrial land uses only, and not permitting any non-industrial uses or uses often considered as appropriate secondary uses in industrial areas. Highway service commercial uses and any other similar uses should also not be permitted within the Rural Industrial land use designation.

If you have any questions, please feel free to contact me at 519-661-2500 ext.4652.

Sincerely,



Gregg Barrett, AICP
Manager, Long Range Planning and Research
GB/

"Attach"

Y:\Shared\policy\CORRES\14CORRES\ThamesCentreOPCommentsDec14.docx

The Corporation of the City of London
Office: 519-661-4980
Direct Line: 519-661-2500 ext. 4652
Fax: 519-661-5397
gbarrett@london.ca
www.london.ca



Planning Services
206 Dundas Street
London, ON
N6A 1G7

London
CANADA

FILE COPY

March 29, 2014

Middlesex County, Planning Services
399 Ridout Street North
London, ON N6A 2P1

Attention: Durk Vanderwerff, Manager of Planning

Re: City of London Comments, Municipality of Thames Centre Official Plan

Dear Mr. Vanderwerff:

Please accept the following as comments from the City of London regarding the Municipality of Thames Centre Official Plan. In general, the City is in support of the proposed policies, particularly as they direct future growth towards the two predominant settlement areas of Thorndale and Dorchester where future urban growth would occur on full municipal services.

The City also supports the identification of settlement area boundaries around the smaller settlement areas (Hamlets). We note that the proposed boundary revisions for the Dorchester settlement area would add two new areas for future residential growth. Two large areas would also be added to the settlement area boundaries adjacent to Thorndale; "Area 2" for future residential development, and "Area 1" for future industrial development. Additional policies in the Plan propose that future urban development will be on full municipal services. Policies 7.4.3 Thorndale Water and 7.4.4 Thorndale Wastewater speak to extension of the water distribution service and a PCP west of the settlement area to address future servicing. Similar policies (7.4.1 and 7.4.2) direct the expansion of water and wastewater services for Dorchester. It should be noted that policy 7.4.1 Dorchester Water does recommend connection to the City of London water supply once capacity is reached at the current water treatment facility, with the potential decommissioning of the water treatment facility after that time. The policies would prohibit new private wells in urban areas. Future development within the identified Hamlet areas will continue on private services.

The City does have specific concerns with the proposed Industrial policies and land use schedules of the Official Plan. The Plan speaks to both "Settlement Industrial" and "Rural Industrial". Lands designated as "Settlement Industrial" represent the primary employment areas in the Municipality, and are intended for a broad range of industrial uses and a limited range of non-industrial uses. The Plan further states that "all (emphasis added) development in this designation is to be fully serviced by municipal or communal water and sewage systems". Conversely, lands designated as "Rural Industrial" are outside settlement areas, and are intended to recognize existing designated lands from previous official plans. Uses are limited to dry industrial uses.

The City supports the designation of the "Settlement Industrial" lands in Dorchester and Thorndale, noting that there are currently some servicing constraints.

The Corporation of the City of London
Office: 519-661-4980
Direct Line: 519-661-2500 ext. 4652
Fax: 519-661-5397
gbarrett@london.ca
www.london.ca

The Plan proposes to add approximately 140 ha to the Donnybrook Industrial Park between Highway 401 and Donnybrook Road, west of Dorchester Road. The intent is to redesignate these lands from "Agriculture" to "Rural Industrial" to provide for new industrial development near Highway 401. The basis for this redesignation is the removal of lands currently designated as "Rural Industrial" and redesignating those lands as "Agriculture". The lands to be redesignated are identified in Table 6-1. The City supports the redesignation of these surplus lands to "Agriculture".

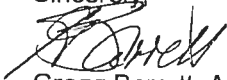
The City has concerns with this addition of these new industrial lands, noting the following:

- The County's Employment Land Needs Study (2012) estimates an annual absorption rate of 2 ha per year, or 40 ha for the 20 year planning period for Thames Centre.
- The Employment Land Needs Study notes a surplus of 213 ha of industrially designated lands in the Municipality, and a total supply of 703 ha in the County.
- These lands are intended to be designated "Rural Industrial". They are not adjacent to the primary settlement areas of Dorchester or Thorndale, nor are they remnant industrial lands from previous Official Plans, which is the basis for the designation of "Rural Industrial" lands.
- These lands are not presently serviced with municipal or communal water or sewage systems.
- These lands would also provide opportunities for commercial, as well as industrial uses.

If such an expansion is proposed, policies should be added that would prohibit new industrial uses until such time as municipal or communal services are available. The amount of the lands to be added for industrial purposes should also be reduced. Given the estimated absorption rates of 2 ha per year, the 140 ha expansion represents a 70 year supply. The expansion should be limited to 40ha, the estimated 20 year demand. Also, consideration should be given to not permitting any commercial development on these lands if they are in fact intended to provide for long term industrial opportunities.

If you have any questions, please feel free to contact me at 519-661-2500 ext.4652.

Sincerely,



Gregg Barrett, AICP
Manager, Long Range Planning and Research
GB/

Y:\Shared\policy\CORRES\14CORRES\ThamesCentreOPReview.docx

The Corporation of the City of London
Office: 519-661-4980
Direct Line: 519-661-2500 ext. 4652
Fax: 519-661-5397
gbarrett@london.ca
www.london.ca