



March 23, 2015

City of London  
Planning Division  
P.O. Box 5035  
300 Dufferin Avenue  
London, ON, N6A 4L9

Re: Re-Think London  
Industrial Lands Urban Expansion  
Public Meeting presentation  
March 23, 2015

Thank you for the opportunity to comment on the direction proposed in this, the latest policy step in the expansion of the industrial lands base. As we have indicated in previous correspondence, we represent TSI International, owner of significant lands in the Wonderland Road area, between Provincial Highway 401 and 402 rights of way.

This area has recently seen the introduction of a new and up to date interchange at Highway 401 and Wonderland Road. A second existing interchange at Highway 401 and Colonel Talbot Road is to be upgraded in the near future to a standard consistent with up to date transport turning requirements. Both Wonderland Road and Colonel Talbot Road have been identified in your Transportation Master Plan as subject of right of way improvements to provide better access to the west end of London. These improvements place the City of London in a unique position to utilize the transportation importance of the entire 401/402 corridor on the south side of London to generate increased economic development particularly in the form of expanded industrial development lands as identified by the Industrial Lands Study, taking advantage of the investments in the transportation infrastructure both existing and planned.

Although the general importance of transportation and the 401/402 corridor is recognized by both this amendment and your new draft official plan, there are few policies that link the importance to the overall economic health of the city and in particular to the potential industrial employment base, even though this factor has been raised on numerous occasions in the industrial study process. It is our opinion that this lack of recognition of this importance has had the effect of reducing the importance of the ability of London to compete with other communities and regions in relation to economic growth.

The 401/402 corridor and its importance to the City should play a much more prominent role in the layout and structure of the new Official Plan and the potential created for new industrial land uses. The 401/402 corridor provides the greatest potential possible within the context of the Provincial and Regional policy framework to enable industrial growth while maintaining intensification directions for other critical uses, such as residential development, which do not have the specific location and transportation needs of industry. At the minimum, lands adjacent to the 401/402 corridor should, where previously identified in your background documents, be protected for future industrial purposes, taking advantage of the improvements that have been made and planned, recognizing the ability to establish suitable buffers between industrial use

patterns and other sensitive uses.

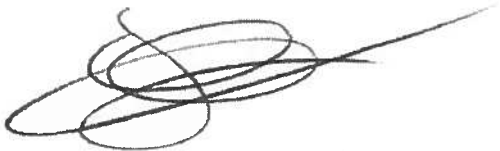
This amendment, in its current form and content identifies a limited new industrial area as being approximately 300 hectares, leaving the identification of any further lands to a future potential process. This creates the need to repeat the entire industrial land study process at the next 5 year review period in order that additional lands may be added to the inventory.

A variety of real estate forecast journals indicate that this type of process will limit the inventory for economic development lands, and have the effect of creating delays and ensuring that other more aggressive centres with more accessible inventory gain more prominent consideration by those seeking suitable locations for new development, particularly in the transportation focused industrial use. As a result we would encourage both staff and Council to reconsider the information and potentials contained in the various background documents that were originally commissioned to support an industrial land base expansion and more fully consider not only the Urban Boundary and time frame limitations of the PPS as they relate to this plan, but also consider that this lack of foresight will slow or negate the potential for valid proposals by the private development sector.

We would be pleased to meet with staff and Planning Committee to expand on our position and provide potential policy options that may resolve these concerns. This is a matter that appears to be confronting many jurisdictions and a number of options have been included in the policies of other jurisdictions to elevate options for industrial lands and economic development that more appropriately fit within the time and process parameters that can reduce impact on ultimate implementation by the private sector.

We thank you for this opportunity. Please provide us with notification of any further progress or approvals as they relate to this amendment and to the adoption and approval of the new Official Plan.

Sincerely,  
**mainline planning services inc.**



for

Joseph P. Plutino, M.C.I.P., R.P.P.

cc TSI International