



ZELINKA PRIAMO LTD
A Professional Planning Practice

January 26, 2012

Chair and Members, City of London Planning & Environment Committee
City Hall
300 Dufferin Avenue
London, ON

Attention: Heather Lysynski, Committee Secretary

**Re: Growth Management Implementation Strategy
2012 Annual Review & Update**

On behalf of Tridon Group Limited (Tridon) and Thames Village Joint Venture (TVJV), we write with respect to the draft Growth Management Implementation Strategy (GMIS) update currently before the Committee. We appreciate the work that City staff have put into revising the GMIS update, but our clients continue to believe that the update does not properly consider or accommodate the proposed development of their lands constituting the easterly portion of the Old Victoria Area Plan (OVAP). The lands within Old Victoria East (OVE) proposed for development by Tridon include 1742 & 1697 Hamilton Road, and 1990 Commissioners Road.

In our previous letter commenting on this matter, dated October 17, 2011, we made note of the significant steps our clients have made to advance their subdivision proposal including the preparation of numerous studies and reports supporting the development. These steps included detailed discussions with the City's urban design specialists to ensure the projects consistency with the Placemaking Guidelines as well as discussions with the City's ecology specialists about proper land preservation and dedication. This is all in addition to all the prior work done on the studies required to develop the OVAP itself. We also noted that the recently installed sanitary sewer and water pipe on Hamilton road that service the City's new industrial park were designed to provide service to all of Old Victoria East.

In the planning for the City's new industrial park, it was always the intention that full value for the high cost to taxpayers of these critical service extensions would be derived from the additional development they made possible within the OVE area. The costs paid to provide the existing infrastructure are much larger than the relatively insignificant costs (ultimately borne by the developers) of establishing the storm water facilities required to service development in the OVE area.

Part of the general concept of growth management as intended to be implemented by the GMIS is to provide for needed opportunities for residential growth within the City, without over-extending or prematurely extending infrastructure. The major servicing risk associated with having fewer restrictions on development is in the potential outlay of expense for infrastructure that will remain unused for long periods due to unexpected market changes or other factors.

While we agree that it is important for such risks to be considered and managed through policy, we suggest that it is just as critical for such policies to be developed in a way that also has respect the need to obtain maximum benefit from previous infrastructure expenditures. If the various real estate sub-markets within London are not properly recognized, potential residential development could be lost to areas outside of the City, deferring the local benefits associated with efficient use of infrastructure.

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Although it is the main focus for new industrial development in the City, Southeast London has very limited opportunity for residential growth. The Summerside Subdivision is the only significant location for growth in Southeast London. [As a single owner project, the pace of growth and type of product may be dictated as much by internal factors as by market forces.] Despite the size of the Summerside Subdivision, the pace of residential growth in Southeast London could be increased by allowing the development lands within the Old Victoria East area with access to the market.

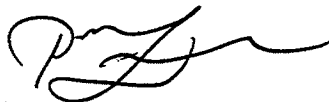
We are concerned that the single-source residential market for this quadrant of the City is restricting the ability of growth to respond naturally to market forces. As a result, it is likely that residential growth potential is being drained by smaller settlements outside of the City, such as Dorchester, Thamesford and Belmont. Other markets such as those of Ingersoll and St. Thomas may also benefit from the limited development options available for Southeast London. Development of the OVE area will stimulate interest in Southeast London and provide an important option for retaining growth in the City and provide increased opportunities for living in a planned community close to a developing major employment area.

It is for these reasons that we continue to assert our conclusion that the GMIS update recommended by staff does not adequately consider the development proposed for the Old Victoria East lands and will needlessly delay the subdivision proposed by our clients. Given the potential benefits to the City that would result from the proposed development and the fact that TVJV has been working in good faith with the City and agencies, we suggest that the GMIS should be revised in a way that provides funding for Old Victoria East stormwater management at an early date.

Please provide our office with a copy of any decision made by Council regarding the GMIS.

Yours very truly,

ZELINKA PRIAMO LTD.



Richard Zelinka, MES, MCIP, RPP
Principal Planner