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File No. 703061

December 14, 2015

By Email Only to csaunders@london.ca

Chair Phil Squire and
Members of the Planning and Environment Committee
City of London
300 Dufferin Avenue
London, Ontario
N6A 4L9

Attention: Ms. Cathy Saunders, City Clerk

Chair Squire and Members of the Committee,

**Re: Public Participation Meeting - December 14, 2015
Item 13: Urban Growth Boundary Expansion for
Future Industrial Growth
File No.: O-8014**

We are counsel to TSI International Group Inc. ("TSI"). TSI and related companies own approximately 380 acres of land located in the area between Highways 401 and 402, west of Wonderland Road, as well as 160 acres of land located east of Highbury Ave South and north of Dingman Drive.

TSI, through its planning consultant, Mainline Planning Services Inc., has participated in the planning processes for the City's Industrial Land Review and Industrial Urban Growth Boundary Expansion and the London Plan.

We have reviewed the report prepared by City planning staff for this meeting (the "Report") with our client and its consultants. While our client agrees with staff's recommendation that the deferred 80 hectare Urban Growth Boundary expansion should not proceed in the location previously proposed, there are fundamental flaws with the findings of the Report and more generally, with the City's Industrial Land Review.

Provincial policy and the principles of good planning direct the expansion of urban boundaries to be carried out on the basis of a comprehensive review, taking into account land availability and need for both population and employment growth.



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The implementation of the City's Industrial Land Review through the adoption of a series of individual area and use specific Official Plan Amendments represents a piecemeal approach to planning that fails to meet the direction and intent of these policies and principles.

The flaw in the City's implementation of its Industrial Lands Review is highlighted, for example, by the uncertainty in the total amount of industrial land available for future industrial uses given the appeals of OPAs 606 and 607, as is now reported by staff. Had the City's Urban Growth boundary expansions been undertaken as part of one comprehensive amendment, the impacts of any appeals could be considered and dealt with by the Ontario Municipal Board through a single hearing process.

The City's review of its Official Plan through the London Plan process is the proper forum for determining urban boundary expansions and associated land use designations on a comprehensive, City-wide basis.

Our client also has serious concerns with the findings of the Industrial Land Review and the ranking of land options therein. Comments in the Report suggesting a lack of market interest in lands west of Highbury Avenue are unfounded, not supported by evidence and, in our respectful view, premised on specious assumptions about the preference of other lands. TSI's lands in the Wonderland Road and Highway 401/402 area are well suited and represent highly desirable locations for employment uses given their close proximity to two major transportation corridors, with recently upgraded underpass and interchange access to one of the major 400 series highways. Further, the long-term protection of these lands for employment uses is mandated by the *Provincial Policy Statement, 2014*.

The approach taken thus far to expand the City's Urban Growth Boundary by way of piecemeal, individual amendments should not continue. Rather, the City should ensure that any necessary expansions are implemented on comprehensive basis through the new London Plan.

We therefore request that the Committee recommend to Council that staff be directed to further study the appropriate location for future industrial growth in conjunction with the London Plan process and to bring forward a comprehensive Official Plan that will address all required urban boundary expansions and designations for the City, including the deferred 80 hectares of industrial land.

Please provide us with notice of any future meetings, reports and decisions made with respect to this matter and the London Plan process.



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Yours truly,
DAVIES HOWE PARTNERS LLP

A handwritten signature in blue ink, appearing to read "M. Alati".

for: John M. Alati

JMA:mem
encl.:

copy: Mr. Joseph Plutino, Mainline Planning Inc.
Mr. Jim Uram, Mainline Planning Inc.
Client