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**BY E-MAIL**  
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To: Mayor Brown and City of London Councillors

Please accept this letter in regard to the upcoming item at Planning Committee on March 19, 2018 regarding the commercial cap on the Wonderland Enterprise corridor. We have submitted a communication to Planning Committee from our counsel and experts.

I am writing to summarize the concern we have with removal of the cap. The supporting report with the staff report by Coriolis in some instances works against the recommendations by staff. And with the discussion around the corridor, the cap, the regional and local demand, capacity in general, existing vacancies, this all gets quite complex. We have spent considerable time working on this issue and feel the points below are the key issues. Please consider:

1. The Enterprise Corridor was intended to create "opportunities for a broad mix of commercial, office, residential and institutional uses" and not be a single retail strip. The City planners have fundamentally misinterpreted the Corridor policies.
2. There is currently, right now, 176,300 sq. m (1,900,000 sq.ft.) of region serving commercial supply that will provide for the next 30 years in South London with the cap in place.
3. Contrary to the Coriolis Report, mixed use development in the Enterprise Corridor is viable considering Greenhills' current plans for residential development with their commercial lands. This conforms with the intent of the SWAP as found by the OMB in its decision: "Simply put, the permitted amount of commercial space will be spread over a wider area and, consequently, there will be room for as of right development of other complementary uses, thereby resulting in a mix of uses throughout the corridor".
4. With removal of the cap, the supply of commercial space grossly exceeds demand to 2047. Since supply greatly exceeds demand, the Coriolis Report recommends redesignating five Commercial sites – Greenhills (Walmart), Aarts, and 3 others to a non-commercial use. However, no market or planning assessment, or public process has been carried out to determine if this recommendation is implementable.
5. Since the proposed OPA recommended by staff does not account for the redesignation of the five commercial sites for other uses that have capacity of approximately 600,000 sq. ft., there will be significant negative impact on existing shopping centres and areas and implies that there

would be closures of approximately 600,000 sq.ft. of existing commercial space. This is a significant amount of space, almost the size of White Oaks Mall.

6. Removing the commercial cap causes significant negative impact and the planned function of commercial areas would be undermined. Those areas include: the Enterprise Corridor, SWAP, the downtown, Transit Villages, and other commercial areas. There is a significant amount of vacant commercial space in southwest London (over 700,000 sq.ft.).
7. Removal of the cap is not consistent with either the London Plan or the Provincial Policy Statement. Those policies were well considered in the development of the Enterprise Corridor concept including the cap.
8. If too much space is permitted too soon, then the City risks having a commercial development pattern of partly developed/partly undeveloped commercial sites and vacancies in existing shopping centres and areas. This is not conducive to properly serving residents and shopping needs nor does it provide a balanced distribution of retail commercial space.

We believe staff recommendations are not well justified and not suitable to South London. The cap should not be removed or in the alternative, this matter should be sent back to City staff requiring the planners to produce a report that addresses the following, which is missing from the current staff report:

- (a) Recommendations for new planning approvals for the five sites listed in the Coriolis Report for which Coriolis states that notwithstanding their current permissions for retail uses, these sites are recommended to be redesignated for uses other than commercial.
- (b) A full and proper analysis of whether this proposed Official Plan Amendment conforms with the London Plan. The Staff report does not address this at all.
- (c) A full and proper analysis of whether this proposed Official Plan Amendment conforms with the Provincial Policy Statement. The analysis in the Staff Report is superficial and erroneous.
- (d) Evidence that, in fact, mixed use development will not occur on the Enterprise Corridor thereby frustrating the intent of SWAP, which is to provide for a mix of uses within the corridor with not each use being based on retail permissions.
- (e) An appropriate analysis on the potential impact of lifting the cap on existing retail designations in South London, including the Pen Equity / Ikea / Costco site, Westmount Mall, Pond Mills Square, and the planned function of retail corridors, the Downtown, Transit Villages, and other commercial areas in London.

I hope this communication is of value to highlight why we have significant concerns with adjusting a commercial cap on a key corridor in South London. Please contact me directly if you have any questions.

Yours Truly,



Ali Soufan  
President, York Developments