

# 1 Introduction

## 1.1 Background

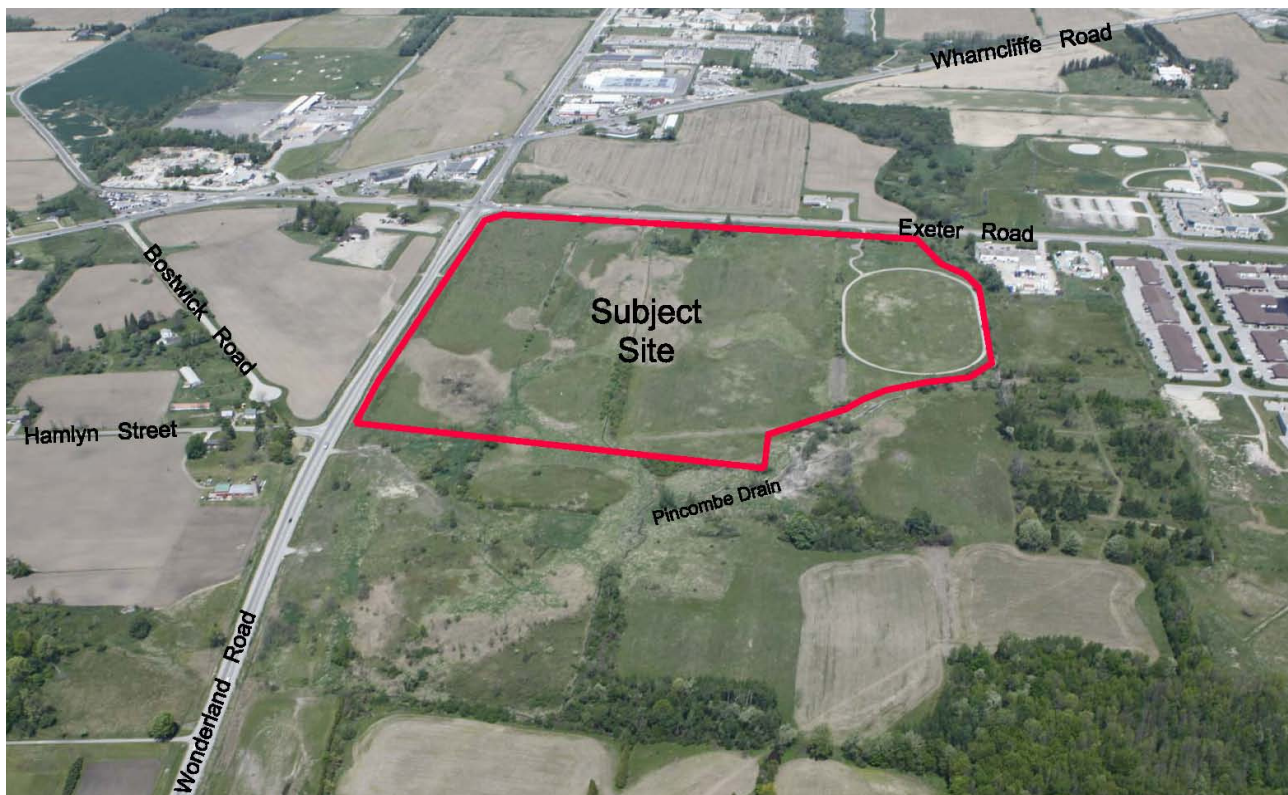
Greenhills Shopping Centres (“Greenhills”) is the owner of approximately 63 hectares (155 acres) of land at the southeast quadrant of Wonderland Road and Exeter Road (see Figure 1). Greenhills is seeking to develop a vibrant, mixed commercial centre in the heart of the Southwest Area that contributes to a well-designed gateway to the City of London. It is envisioned that the Greenhills proposal will include buildings and spaces that reinforce the Wonderland Road corridor as well as internal streets; a fine-grained circulation system on the site that is permeable for all modes of transportation; a rehabilitated and naturalized Pincombe Drain corridor; an open space and trails system connected to the surrounding area; well designed and necessary City infrastructure which will provide benefits to the City’s current and future residents; and an overall “sense of place” that is warranted for this key entry node in the City of London.

## 1.2 Purpose

Greenhills has been an active participant in the South West Area Plan (SWAP) process. They have reviewed the Draft Southwest London Secondary Plan (June 2012) as well as the concept directed by Council on June 26 and 27, 2012. In response, Greenhills provides this detailed submission for the City of London’s consideration, which:

1. Requests Council to extend the contemplated “Enterprise” designation along the Wonderland corridor southwards to Hamlyn Street;
2. Identifies Greenhills’ land use and design vision for their site as part of the Enterprise designation;
3. Provides comments concerning the market demand analysis for the SWAP;
4. Identifies a more logical servicing approach to development of the Wonderland corridor benefitting the City in the short and long term; and
5. Provides comments on the land use policies of the Secondary Plan.

**Figure 1:** Site Location



# 2 Vision

## 2.1 Site Context

The property is strategically located at the intersection of two major arterial roads, Wonderland Road and Exeter Road, at the heart of the Southwest Community (see Figure 2). It is well positioned to provide a mixture of commercial uses, including retail commercial, service commercial, and office uses to serve the current and future residents in Southwest Area. Wonderland Road is a primary entryway into the City from Highway 402 as well as from the future Highway 401 interchange facilitating development of the City's Gateway Business Park. Given this highly visible location, and the City's direction to create an attractive gateway into the City, a high level of urban design is of the utmost importance.

## 2.2 Guiding Principles

Greenhills is seeking to develop a vibrant, attractive, mixed commercial centre in the heart of the Southwest Area that contributes to the establishment of a well-designed gateway to the City of London. This vision is consistent with the guiding principles of Section 20.5.6 of the Secondary Plan regarding the Wonderland Boulevard, which generally extends from Southdale Road to Dingman Drive and includes the Greenhills site. The guiding principles of the Wonderland Boulevard seek to create a spine to the Southwest Area that accommodates: a fine grained network of streets; a mix of residential and employment (commercial and modest office) opportunities; a higher order transportation corridor concerning transit and active transportations; and a pedestrian-oriented, street-oriented form of development.

Figure 2: Site Context



### 2.3 Enterprise Designation

Greenhills supports the Council direction that an Enterprise designation replace the land use designations recommended by staff along Wonderland Road and suggests that the southerly limit of this Enterprise designation include lands on the south side of Exeter Road down to Hamlyn Road (see Figure 3). In accordance with this Council resolution this designation would allow for a mix of commercial, high density residential, office and institutional uses along the Wonderland Road corridor. This designation would permit the development of the site for the mix of uses as proposed by Greenhills.

Such a designation would allow for a mix of commercial, high density residential, office and institutional uses along the Wonderland Road corridor and would provide flexibility for a variety of land uses. A key aspect to Council's direction is a policy approach that would ensure that development in the Enterprise designation would achieve a high level of urban design, recognizing Wonderland Road as an important gateway into the City. Greenhills is committed to working with the City in developing the Enterprise Designation policies to achieve these objectives.

At this time, land use policies for an Enterprise Designation have not been prepared by City Planning staff and released for public review. It is anticipated that Enterprise Designation policies would seek to:

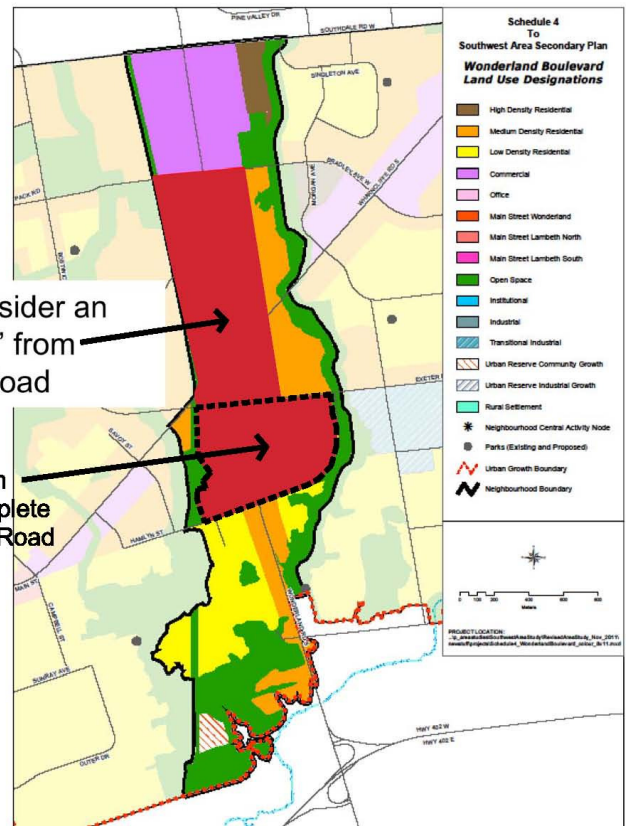
- Attract new development along the Wonderland Road corridor, recognizing it as a key City gateway;
- Provide for a mix of commercial, institutional, office, residential and live/work activities that is market driven rather than policy driven;
- Take advantage of and permit developer reaction to the market opportunities of this prominent corridor;
- Encourage the creation of a good quality working and living environment;
- Achieve coordinated, attractive, and safe streets as well as and high quality open spaces; and
- Site a significant portion of new buildings along major road frontages to frame the street.



Figure 3: Enterprise Designation

Council Direction to consider an "Enterprise Designation" from Bradley Ave to Exeter Road

Land requested to be included in "Enterprise Designation" to complete the four corners at Wonderland Road and Exeter Road



## 2.4 Landowners Plan

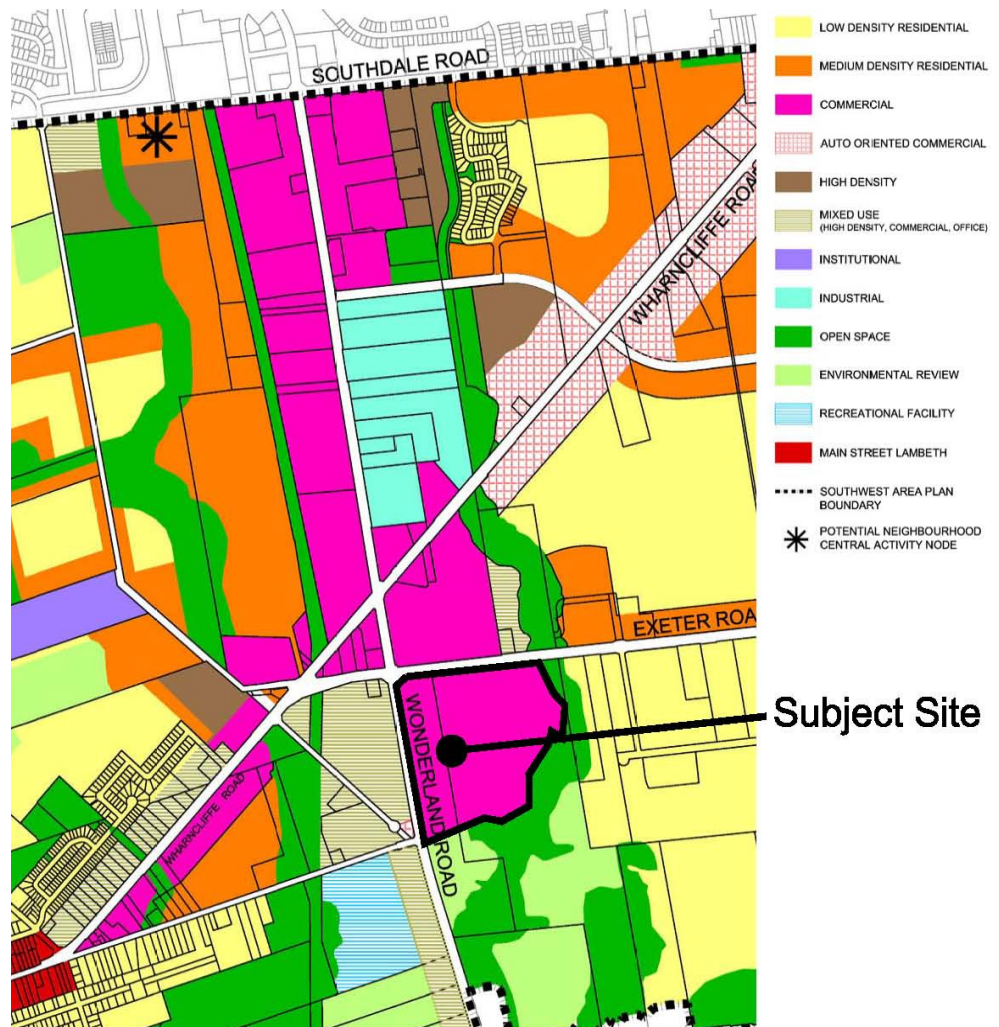
Greenhills does not support the residential land use designation of its property set out in the draft Secondary Plan (June 2012). Greenhills provides more specific comments regarding schedule changes and policies within the draft Secondary Plan in Appendix "A" to this submission.

Greenhills urges that their property should be designated commercial, under the Enterprise designation as directed by City Council. The Greenhills site is a logical commercial location, situated close to the population at the heart of the SWAP. It is well connected to the existing and proposed arterial road network, situated at the intersection of existing high volume roads where commercial development gravitates, and provides easily accessible service to the surrounding area. It is also complementary to the existing retail node at the Southdale Road and Wonderland Road, providing a good distribution of retail commercial service to the area.

Several landowners in the Southwest Area have come together to look at means of appropriately developing the Southwest Area and have prepared a comprehensive land use plan for the area (see Figure 4). The plan shows a "Commercial" land use on the Greenhills property, which is permitted by the Enterprise Designation put forward by Council. This plan provides an appropriate land use for the property that will provide and contribute to an attractive gateway to the City; provide for a commercial development which will serve the needs of the current and future residential population in the Southwest Area; provide significant contributions to the assessment base as well as jobs for the City; and provide for the construction of infrastructure necessary for development of the City providing significant benefits for the area.

**Figure 4:** Southwest Area Landowners Concept

(Refer to Appendix B to this submission for the complete graphic of the Southwest Landowners Plan)



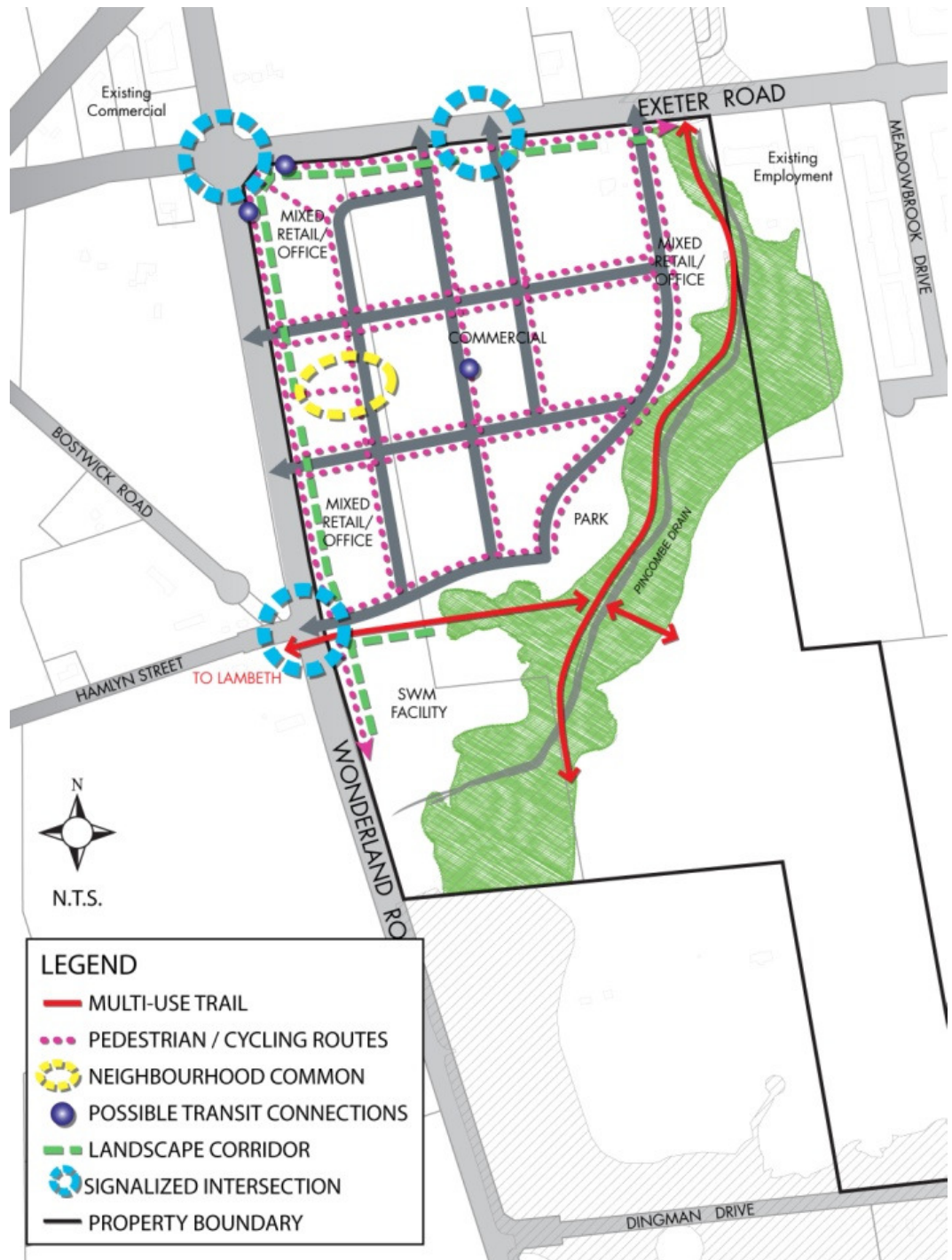
## 2.5 Neighbourhood Concept

In keeping with the concept prepared together with Southwest Area, Greenhills has prepared a neighbourhood structure concept for the development of its site (see Figures 5 and 6).

Figure 5: Neighbourhood Structure Concept



Figure 6: Neighbourhood Structure Concept (Connectivity)



The following are the key components of Greenhills' general neighbourhood structure concept:

**i. Pincombe Drain**

The Pincombe Drain will be protected and enhanced through the site's development. This includes naturalizing the corridor through plantings as well as including multi-use trails for walking and cycling that connect to overall trail network to the north and south.



**ii. Internal Roads / Driveways**

The internal network of roads and private driveways is structured to create logical development blocks that can facilitate a variety of commercial floor plates. The individual blocks also facilitate intensification opportunities and development of other uses envisioned by Council's proposed Enterprise designation as the Southwest Area matures and as market conditions warrant.



**iii. Pedestrian Connections**

A sidewalk system is structured to allow direct and convenient pedestrian movements internally and externally to the site. A grid network of public roads/private driveways facilitates logical traffic, cycling and pedestrian movement and a high degree of connectivity. Possible transit stops can be integrated internally, in addition to those along the Wonderland Road and Exeter Road corridors.



**iv. Open Spaces**

A series of open spaces are distributed throughout the site to provide spaces for site users. This includes a central neighbourhood common, features at the corner of the site along Wonderland Road, and green spaces along the Pincombe Drain corridor. These open spaces can provide a range of different recreation and design functions on the site.



**v. Stormwater management facility**

Accommodation is made of a storm water detention facility in accordance with the Pincombe Drain Class Environment Assessment. It is anticipated that this facility will be significantly landscaped and treated as a visual amenity contributing to the Forest City character of the Wonderland corridor in addition to providing the necessary functional service of managing quantity and quality of outflow into the Pincombe Drain and Dingman Creek.



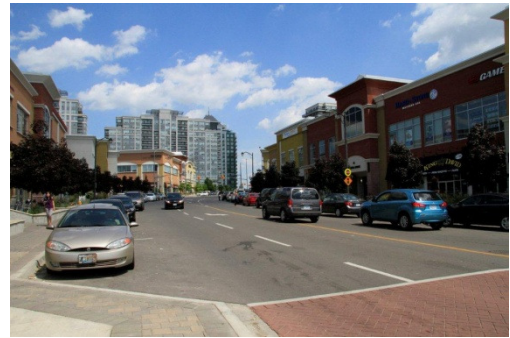
**vi. Mixed Retail / Office precinct**

This precinct will contain a mix of retail, service and office commercial uses, either in stand-alone or mixed-use buildings. This precinct is organized to reinforce the Wonderland Road corridor and the intersection with Exeter Road on the western edge of the site, as well as the Pincombe Drain corridor on the eastern edge of the site. Building floorplates would be smaller in scale to reinforce the pedestrian scale.



**vii. Commercial precinct**

This precinct will contain a mix of retail and service commercial uses, either in stand-alone or mixed-use buildings. This precinct is organized to integrate well with the vehicular and pedestrian connections from the Mixed Retail/Office precinct to ensure the overall site develops in a coordinated fashion. Building floorplates would range in size to accommodate a broad range of tenants.





## 2.6 Demonstration Concept

Greenhills is committed to creating a high quality, well designed commercial project which will provide the City with a visually attractive gateway recognizing the prominent location in the City. With this in mind, Greenhills has prepared a demonstration concept illustrating the future development of the site in keeping with the principles and structure identified above (see Figure 7).

Figure 7: Demonstration Concept



The Demonstration Concept provides for approximately 62,500 square metres (670,000 square feet) of total commercial space, including both retail and office space.

The Demonstration Concept illustrates:

- An interconnected grid network of internal private roads and driveways on the site;
- Buildings massed and oriented toward Wonderland Road and Exeter Road to frame these key streetscapes;
- Retail and mixed-use buildings oriented to internal “main streets” leading from Wonderland Road;
- Parking areas located away from Wonderland Road and Exeter Road and screened by buildings;
- A central common linked to Wonderland Road that can accommodate a range of civic functions;
- Amenity areas at the site’s Wonderland Road intersections that create unique and readily identifiable features in keeping with the prominence of these major intersections;
- Well landscaped and tree lined arterial road rights-of-way that is representative of the “Forest City”;
- Providing integration with walking and cycling paths internal and external to the property providing linkages to the overall community.
- Maintained views through the site to trail access points, open and amenity areas, and building focal points.
- Mixed office and employment buildings fronting the internal collector road, screening the service areas of other buildings.
- A significant portion of the Hamlyn Street extension through the site as a single-loaded route facing the future SWM facility and Pincombe Drain corridor providing views and vistas; and
- Possible trail connections along the south side of the Hamlyn Street extension for an additional active transportation connection point to the Lambeth Community.

Through the development of the Site, Greenhills and its tenants will also implement green design and building technologies that will reduce energy consumption, protect the natural environment and reduce the “heat island” effect. A significant portion of the Greenhills property will be protected open space, including the Pincombe Drain corridor and a significant woodlot along the property’s Dingman Drive frontage. The Pincombe Drain corridor will be naturalized with plantings in addition to accommodating a multi-use trail system linking the broader community and allowing for active transportation through the community.



# 3 Market Demand

## 3.1 Site Appropriateness

The SWAP is planned to accommodate in the order of 50,000 people at full build out. This population will require a significant portion of retail floor space to satisfy the retail shopping needs of the growing population. The Greenhills site is a logical commercial location to fulfill this need, proximate to the population for which the required retail space will serve. It is in the heart of the Southwest Area and is well connected to the existing and proposed arterial road network. It is located at the intersection of existing high volume roads where commercial development gravitates and provides easily accessible service to the surrounding area. It is also complementary to the existing retail node at Wonderland south of Southdale Road providing a good spatial distribution of retail commercial service to the planning area.

The addition of retail commercial along both the Wonderland Road and Exeter Road corridors will provide for an activity node which would generate transit ridership at a variety of times throughout the day and week. For instance, Exeter Road connects the Lambeth Community with employment areas, west of the Pincombe Drain, at Oakdale Road, the Wellington Road Corridor, and employment areas

## 3.2 About the Developer

Greenhills' parent company, SmartCentres, is one of Canada's premier retail commercial developers. SmartCentres have the depth of experience and proven track record required for creating quality projects tenanted by nationally branded tenants. They have become the largest developer of unenclosed shopping centres in Canada, having built over 200 shopping centres across Canada since 1994, with a total leasable area over 47 million square feet. Their client portfolio already includes more than 25 of the World's Top 200 Retailers including Walmart, Winners, Michael's, Reitmans, and Best Buy.

Operating in over 100 communities and all ten Provinces, SmartCentres has invested over \$8 billion in Canadian communities through its shopping centres and have generated over \$1.2 billion of property taxes to communities.

## 3.3 Market Report Review

Tate Economic Research Inc. ("Tate") has reviewed the Kircher Market report, dated May 2012, and the City staff presentation from the June 27, 2012 public open house on behalf of Greenhill. Tate's review is attached to this submission as Appendix C. Key findings of Tate's review include the following:

### i. Kircher Report has Vastly Understated Demand for Retail Space

The full residential build out was not accounted for in the Kircher analysis. The Kircher report based recommendations on a 2026 population. In Tate's opinion, this is inappropriate and has resulted in significantly understating the amount of warranted retail space in the South West Area.

### ii. Wellington and Highway 401 Area

Two vacant commercial land use designations included in the SWAP, Wellington Road and Highway 401 (788,705 sq.ft.) and Wellington Road and Dingman Drive (272,529 sq.ft.), are far removed from the population of the South West Area. These sites are separated from the residential population by a significant distance of land accommodating existing and planned industrial use. In Tate's opinion that this commercial area will not predominantly serve the residents of the SWAP. Therefore it is inappropriate to include this entire 1,061,234 square feet as commercial space serving the needs of the SWAP residents.

**iii. Commercial Supply in Enterprise Corridor  
(Wonderland Road)**

The City's calculations have overstated the amount of available retail commercial land in the proposed Enterprise designation. Development of this entire area for Commercial, in particular retail, uses does not seem realistic. Much of this land is already developed and seen as viable uses (i.e. London Transit Commission, Hully Gully and many others). It is unlikely that these facilities will be purchased, demolished and rebuilt with new retail commercial in the foreseeable future.

**iv. Impact on Lambeth Commercial**

Lambeth is underserved with retail offerings and will not be impacted by new retail proposed in the Southwest Area. Much of the commercial space in Lambeth is oriented to convenience commercial uses, and differentiates the Lambeth commercial from that of Wonderland Road.

Tate's review concludes that in considering the above noted factors and the retail development potential of the Greenhills site, that it is *"reasonable to conclude that there is market demand for additional commercial uses on Wonderland Road and that the Greenhills Shopping Centre Site is an appropriate location for retail development."*

# 4 Servicing

## 4.1 Servicing Approach

The City staff recommended servicing/phasing approach takes the position that developing along Wonderland Road from north of the existing commercial area to the south would allow for the orderly development of the South West Area that is cost effective for the City. Greenhills and other landowners in the Wonderland Road corridor disagree with this proposed servicing strategy.

## 4.2 SWAP Development & Infrastructure Financing Overview

Greenhills, with advice from its consultants, suggests that the City's approach to infrastructure cost analysis and corresponding conclusions prepared for the SWAP is incomplete. The work completed to date by staff and their consultants concentrates too heavily on CSRF costs without revenues and includes too much regional infrastructure work in the overall cost estimates and phasing assumptions.

For example, the proposed regional stormwater management (SWM) facilities on the Dingman Creek are included in some of the cost estimates for the SWAP, but those works will be constructed to the benefit of all of South London regardless of development progress or SWM requirements along Wonderland Road. Therefore, they shouldn't be included, and the overestimate of cost tends to raise the level of concern of senior administration and Council members that development of the area will increase the "DC reserve fund deficit" as well as put additional pressure on the capital budget.

Greenhills and other landowners in the area continue to promote their intention that the required infrastructure financing risk and cash flow requirements can be carried by the developers to the benefit of the City in terms of new revenues and employment growth.

Furthermore, the SWAP 'financials' should include an analysis and summary of gross and net DC revenues, new assessment revenues, and return on investment along with an estimate of the new temporary and permanent direct and indirect employment to be created along with those additional revenues. The absence of this kind of analysis will result in a decision by Council which is not properly informed.

## 4.3 Development Phasing

### i. Alternative to the "North to South" Servicing Strategy

City staff has continued to support a servicing/phasing approach that promotes continued development along Wonderland Road from the existing commercial area near Southdale Road toward the south on the basis that it promotes "orderly development that is cost effective for the City". Greenhills, informed by its consultants, suggests that the staff's proposed 'North to South' servicing strategy is not the preferred approach once all of the relevant considerations are understood and measured on the basis of engineering efficiency and cost.

To more carefully examine the staff position on servicing, Greenhills retained Development Engineering (London) limited (DELL) and ManEngment Engineering Ltd. (Meng) to review the costs and benefits of the City's development phasing strategy and the corresponding proposed policies of the draft Secondary Plan. These two longtime proven London consulting civil engineering companies have studied the municipal servicing and financing of the Southwest London area for over 30 years. Their analysis and north to south servicing strategy shows lower costs than the City staff 'North to South' servicing strategy for the Wonderland Gateway. Accordingly, they have recommended an alternative development phasing approach and supporting financing strategy. Their analysis is based on more detailed

engineering design and cost estimates than the SWAP and it provides for a more appropriate "uphill construction" drainage servicing plan with associated cost-sharing plan.

## ii. Orderly Development

Staff's support for the "North to South" servicing strategy has not taken proper consideration of the significant development that has already occurred in the area in the vicinity of the Greenhills' property and the state of servicing of these lands. The east side of Wonderland Road is already developed by a mix of employment and commercial uses but is also serviced by private septic services. The land in the area of Wonderland Road, Exeter Road, and Wharnccliffe Road intersections is largely developed for retail and service commercial uses and is only served by private septic services. Development of the Greenhills site will help to relieve those existing developments from further possible groundwater contamination, and it will occur within the City's urban growth boundary which has been approved for 20 years.

As well, some of the existing commercial uses in this area have experienced significant inconvenience and septic system maintenance costs which would be eliminated by the sanitary trunk sewer proposed by Greenhills.

## iii. Property Sanitary Servicing

There is another way to look at the Greenhills development proposal from an existing land use and servicing perspective. Development of the Southeast corner of Exeter and Wonderland would actually contribute to infilling between the developed lands to the east and the Lambeth area community to the west.

Equally important is that Greenhills' proposed design and construction of the water, sanitary, storm and road improvement services along Wonderland between Dingman Drive and Exeter Road provides servicing benefits not only

to Greenhills, but also to all of the existing and proposed development in the area, unlike the City's plan 'North to South' servicing proposal.

There is already significant servicing infrastructure in place to service the proposed Greenhills development. This includes the new sanitary pumping station at the southeast corner of Dingman Drive and Wonderland Road which was paid for mostly by growth to solve an existing City problem, and remains largely underutilized by new development which has effectively been frozen in the area for 20 years.

Additionally, the required major arterial roads and right-of-ways i.e. Wonderland, Exeter and Wharnccliffe, are in place, and only minor improvements are needed. Permitting development, where feasible, along the entire Wonderland Gateway will ensure that the ultimate municipal storm and sanitary services are put in place without reliance on temporary, potentially unreliable, or throw-away services.

From a financial perspective, the "South to North" municipal servicing and development phasing and financing strategy proposed by Meng/DELL is less expensive, standard practice, and more beneficial to the City and all of the area landowners.

Greenhills suggests that the entire Wonderland corridor should be allowed to proceed with development in accordance with the servicing strategy provided by Development Engineering as market demand supports. Putting in place appropriate land use designations and zoning will allow for such market driven development of the Wonderland Corridor over the planning period.

## iv. "South to North" Servicing Strategy

Greenhills' suggests that it makes much more financial and technical sense to proceed from Dingman Drive to the north along Wonderland Road. The sewer outlet for all of the Gateway and surrounding land is already in place at

Dingman Drive and Wonderland Road, and Greenhills and other benefitting land owners are prepared to build and front-end the master plan trunk sanitary sewer beginning at this downstream outlet.

Additionally, the required SWM facility for development of all of the broader area is also immediately north of Dingman Drive on land owned by Greenhills. In other words, the primary drainage outlets (sewage and storm water) for development of the Wonderland Gateway are at the south end of the subject corridor. More information on this new, improved, and more accurate engineering analysis is provided in Appendix D.

It should be noted that storm and sanitary drainage systems and sewers are typically built moving uphill from the existing outlet. In this context, the "orderly growth" approach adopted by staff would suggest beginning development servicing and financing from the south limit of the Modified Urban Growth Boundary moving north to Wharnccliffe. The "south up" approach cannot be considered "leapfrogging"

because the south i.e. Dingman Drive is where the storm and sanitary servicing outlets already exist. All of the subject land has been designated for growth inside the Modified Urban Growth Boundary for approximately 20 years; periodically confirmed by 5-year interval Official Plan updates.

The below table was prepared to assist the City in understanding the potential value of this proposal to London overall. This table shows the significant new DC and assessment revenues to the City of London along with an estimate of the temporary and permanent direct and indirect employment that is expected to be created with the requested commercial designations.

Aug. 31, 2012



### Greenhills Shopping Centres

**TABLE 1**

**SUMMARY OF ESTIMATED BUILDING AREAS, COSTS & JOBS<sup>1</sup>**

	Commercial	ft. <sup>2</sup>
	Building Floor Area	670,388
	DC Rate (sq.m) =	\$169.74
	<b>Total DC Revenue =</b>	<b>\$10,450,000</b>
	<b>Total Est. Claims =</b>	<b>\$5,350,000</b>
	<b>Total Est. Net DC revenue =</b>	<b>\$5,100,000</b>
	Total Greenhills Commercial Development Cost <sup>2</sup> =	\$124,021,854
	Est. DC infrastructure const. (temporary) Jobs <sup>3</sup> =	35
	Est. Commercial building const. (temporary) Jobs =	437
	Est. External Road & Servicing const. (temporary) Jobs =	21
	Est. Internal Site Servicing (temporary) Jobs =	98
	<b>Total New Direct Temporary Jobs =</b>	<b>354</b>
	<b>Est. New Permanent Jobs<sup>4</sup>=</b>	<b>1,876</b>
	<b>Total New London Jobs =</b>	<b>2,230</b>
	<b>Total Est. New Annual Tax Revenues to City of London =</b>	<b>\$4,780,203</b>

1. Direct temporary (const.), indirect, and permanent new jobs & new tax revenues to City of London based on LEDC industrial development model.  
 2. Total new commercial development, building, servicing & land cost = \$185/ft<sup>2</sup> including approvals, design, landscaping. Assessment value = \$200/ft<sup>2</sup>.  
 3. Temporary jobs based on 87% (excl. HST) of infrastructure costs incl. DC claims @ 50% labour @ 9 month const. period [75%] @ \$60,000 annual income.  
 4. New Permanent Jobs: Commercial = 20/10,000 ft<sup>2</sup> + indirect jobs = permanent jobs\*1.9 (LEDC Model); 60% London resident for new taxes @ \$500/yr. net.

# 5 Conclusions

Greenhills Shopping Centres is seeking to develop a vibrant, mixed commercial centre on their 63 hectare property located in the heart of the Southwest Area. This commercial project, among other elements, would contain a mixture of commercial uses, including retail and office uses; an integrated and interconnected circulation network; a naturalized Pincombe Drain with multi-use trails; and a design approach that reinforces the edges of the abutting arterial road edges. The project is in keeping with the design intent for the Wonderland Boulevard within the draft Secondary Plan.

Greenhills is supporting the June 27, 2012 Council direction that an Enterprise designation replace the land use designations recommended by staff along Wonderland Road and is requesting that the southerly limit of this Enterprise designation include lands on the south side of Exeter Road down to Hamlyn Road. Furthermore, Greenhills is requesting that their site be designated “Commercial” under this Enterprise designation. Greenhills submits that their site is a logical commercial location given its central location, its connections to surrounding communities, its prominence at the intersection of two high volume roads, and its complementary nature to other commercial developments along Wonderland Road.

Greenhills’ submission includes a retail market commentary that concludes that there is sufficient market demand for commercial space in the Southwest Area over the planning period to support the amount of retail space proposed to be accommodated on their site while at the same time accommodating other proposed retail developments along Wonderland Road.

Greenhills submission also includes an assessment of the servicing strategy proposed in the draft Secondary Plan. This assessment of infrastructure and phasing strategies concludes that the SWAP servicing approach is inadequate

and presents an incomplete picture of the true costs of servicing. The assessment suggests that it makes more financial and technical sense to go forward with municipal servicing from Dingman Drive and proceed to the north along Wonderland Road, rather than the proposed “North to South” strategy presented in the draft Secondary Plan.





# Appendix A

**Comments on Draft Secondary Plan (June 2012)**

Section	Policy	Comment
Schedule 3 Neighbourhood Land Use Designations	Greenhills property is proposed to be designated "Medium Density Residential" and "Low Density Residential"	Greenhills Lands ought to be designated as "Commercial" as part of the "Enterprise Designation", as per the above submission.
Proposed Schedule A Amendments (Official Plan)	Greenhills property is proposed to be designated "Multi-Family, Medium Density Residential" and "Low Density Residential".	Greenhills Lands ought properly be designated as "New Format Regional Commercial Node", as per the above submission.
20.5.1.4.3 ii)	<i>"e) Provide opportunities for the extension of existing commercial areas to meet anticipated population growth based needs."</i>	Greenhills suggests that this policy be amended to also recognize the opportunity to create new commercial areas, not just extending existing areas.
20.5.3.8.3 ii) Design for Wonderland Road South	<i>"a) Condition 1 – Full Local Access Road This condition applies adjacent to the Medium Density Residential designation south of Exeter Road, and adjacent to the High Density Residential and Commercial designations between the London Transit Commission (LTC) site and Bradley Avenue. It consists of four through lanes divided by a median, with a single, one-way local access lane on each side incorporating a landscape median, bicycle lane, sidewalk and green area for utility co-location. The centre median is designed to accommodate one or two left turn lanes at the intersections with Exeter Road and Kilbourne Road, to accommodate potential requirements based on future traffic studies."</i>	Greenhills, as well as other landowners, does not agree with the design direction for the Wonderland Road corridor as presented in the Secondary Plan. Greenhills questions the cost, function, and design impacts of the proposed design approach on this major arterial road corridor. Greenhills urges Council to allow a more fulsome review of the design direction for Wonderland Corridor.
20.5.3.9	<i>"The buildings and public spaces constructed within the study area will directly respond to the design of the public right-of-way."</i>	Greenhills requests that this statement be revised given the meaning of "directly respond" is too vague to provide any development direction.
20.5.3.2 ii)	<i>"As part of a complete application for development within the Southwest Planning Area, a report shall be submitted explaining how the proposed development has incorporated the following goals and objectives: a) New buildings should strive to include green</i>	Given these green practices are "encouraged" by the policies, Greenhills questions the need for such a report. Furthermore, LEED is only one particular "brand" for measuring sustainability practices, and the policy should be

	<p><i>technologies that meet the criteria for sustainable development set out in Section 20.5.3.2 i), and the Owner shall demonstrate how Leadership in Energy and Environmental Design (LEED) principles have been incorporated. The Owner should strive to achieve LEED certification.”</i></p>	<p>modified to reflect a broader range of sustainability measures or brands.</p>
20.5.2	<p><i>“iii) Wonderland Road South shall be designed, constructed, landscaped and maintained as a multi-lane divided street that serves as an appealing gateway to the City, and supports, through non-standard access provisions, intensive residential, commercial and office development.”</i></p>	<p>Greenhills’ comment above regarding the overall design approach for the Wonderland Road corridor, including non-standard access provisions, applies to this policy.</p>
Proposed Schedule A Amendments (Official Plan) 20.5.3.8.1	<p><i>“vi) At the subdivision and/or site plan application stage, where applicable, the Owner shall convey and construct the Primary and/or Secondary Collector roads, identified on Schedule C of the Official Plan, to ensure future opportunities for connectivity between neighbourhoods.”</i></p>	<p>The Hamlyn Street extension onto the Greenhills Lands is identified as a Primary Collector on the Proposed Schedule C Amendment to the Official Plan. Policy 20.5.3.8.1 requires the conveyance of such roads as public roads. Greenhills proposes to develop this road as private road, as per the general alignment as shown, and thus, requests to have this Primary Collector removed from their property.</p>
20.5.3.9 i)	<p><i>“a) All development, particularly in the Wonderland Boulevard, ... , shall be designed in a form that is to be compact, pedestrian oriented and transit friendly. Mixed use development will be encouraged in the areas of Wonderland Boulevard, Lambeth Village Core and the Neighbourhood Central Activity Nodes.”</i></p>	<p>Wonderland Road is a major arterial road, and Greenhills’ experience in London and other jurisdictions is these types of roads have not, in these other locations, become the type of street contemplated by this policy. Therefore, these policies ought to be amended to state “compact, pedestrian-oriented and transit friendly, where appropriate and feasible”.</p>
20.5.3.9 ii)	<p>“Arterial Roads ...A balance must be achieved between their transportation function, including accommodation for transit, and their ability to provide access to adjacent land uses, and to act as socially vibrant public space.”</p>	<p>As per comment above, Greenhills’ requests that these requirements ought to be followed with a statement “where appropriate and feasible”, to ensure that these requirements are not overly restrictive and therefore</p>

		preventing the build-out of the street.
20.5.3.9 ii)	<p>“a) <i>Generally, heights of buildings shall also be related to road widths to create a more comfortable pedestrian environment, so that the wider the road width, the higher the building height</i>”.</p>	<p>The desired sense of enclosure envisioned by this policy contradicts the design approach for Wonderland Road with a 57 metre right-of-way. The desired sense of enclosure (1:1 or 1:2 ratio?) would necessitate buildings that are out of scale with the character of the area. Greenhills suggests that the wording of this policy be revisited and modified where necessary.</p>
20.5.3.9 iii)	<p>“b) <i>These retail and service commercial uses may be in stand-alone stores or in the ground floor of mixed use buildings. In these areas:</i></p> <ul style="list-style-type: none"> <li>• <i>the principal public entrance should provide direct access onto the public sidewalk;</i></li> <li>• <i>the primary windows and signage should face the street;”</i></li> </ul>	<p>Greenhills requests that these policies be modified to indicate “where appropriate and feasible” so as to provide flexibility for different circumstances and sites, in keeping with the overall intent for the Wonderland Boulevard.</p>
20.5.3.9 iii)	<p>“e) <i>Where large-format retail stores are proposed, design alternatives that contribute to the creation of a vibrant and active streetscape, may include, but not limited to, locating large-format retail stores in the interior or at the rear of commercial or mixed use development blocks with smaller stores and buildings oriented to the surrounding public rights-of-way to create a strong street presence. Alternatively, the frontage of the large-format retail store facing the public right-of-way should be lined with smaller stores with entrances oriented to the streetscape. Parking areas will be integrated with development associated with large-format retail stores, in a manner designed to contribute to the objective of a vibrant and active streetscape</i>”</p>	<p>This refers to the second e) in the current draft; it should be referenced as g) in keeping with the lettering.</p>
20.5.6 iii)	<p>“a) Any expansions or additions to the Commercial or Office designations shall be limited to the lands fronting Wonderland Road South,</p>	<p>This policy would have to be revisited, and modified as necessary, to reflect the designation of Greenhills’ site as “Commercial” within the</p>

	between the Ontario Hydro corridor to the west and the Open Space Corridor to the east, extending in a north & south direction, south of Southdale Road West and north of Exeter Road;”	Wonderland Boulevard Neighbourhood.
20.5.6 iii)	“c) <i>An expansion of the Commercial designation south into the High Density Residential designation may be considered. This expansion may be permitted once a minimum of 75% of all of the Commercial lands within the Wonderland Boulevard, North Longwoods and Central Longwoods that were not developed or under development on the date of the adoption of this Secondary Plan, have been developed and are occupied. Any expansion will also be subject to the extension criteria for New Format Regional Commercial Nodes in Section 4.3.6.4 of the Official Plan;</i> ”	This policy would have to be revisited, and modified as necessary, to reflect the designation of Greenhills’ site as “Commercial” within the Wonderland Boulevard Neighbourhood. Development of commercial and other uses in the Enterprise Designation (including Greenhills land) should be allowed to proceed as market conditions warrant. Greenhills has concerns as to how the threshold would be tracked over time.
20.5.6.4 i)	“ <i>The Commercial designation is intended to recognize the existing large-scale, standalone and limited strip commercial uses located on the east and west sides of Wonderland Road South, south of Southdale Road West, and to support the commercial development of a limited area south of Bradley Avenue in order to anchor the commercial node.</i> ”	This intent for the Commercial designation would have to be revisited, and modified as necessary, to reflect the designation of Greenhills’ site as “Commercial” within the Wonderland Boulevard Neighbourhood.
20.5.6.4 iii)	“a) <i>Commercial development for the entire commercial designation shall not exceed 120,000m<sup>2</sup> gross floor area.</i> ”	This policy for the Commercial designation would have to be revisited, and modified as necessary, to reflect the designation of Greenhills’ site as “Commercial”, as well as considering the market demand review presented in Greenhills’ submission.
Schedule 17 Development Phasing Plan  20.5.16 d)	Greenhills property is proposed to be located within the “Wonderland South Corridor”  “i) <i>Development of the Wonderland ‘South Corridor’ shall begin from Wharncliffe Road South and progress southerly to Dingman Drive, including all permanent servicing.</i>	Greenhills disagrees with the Secondary Plan’s “north to south” servicing strategy, as per their submission. Greenhills suggests that it makes much more financial and technical sense to proceed from Dingman Drive to the north along Wonderland Road. The sewer outlet for all of the Gateway and surrounding land is already in

	<p>i) <i>The construction of the trunk sanitary sewer on Wonderland Road shall trigger the development of the Wonderland ‘South Corridor’ and the decommissioning of the pumping station within the Wonderland ‘North Corridor’ service area.</i></p> <p>ii) <i>Timing to service and develop these lands shall be considered in the Growth Management Implementation Strategy and the 2014 Development Charges Study.”</i></p>	<p>place at Dingman Drive and Wonderland Road, and Greenhills and other benefitting land owners are prepared to build and finance the master plan trunk sanitary sewer beginning at this downstream outlet. The primary drainage outlets (sewage and storm water) for development of the Wonderland Gateway are at the south end of the subject corridor.</p> <p>Given this, the reference to Wonderland ‘North Corridor’ and Wonderland ‘South Corridor’ should be deleted, and the combined area ought to be known as the “Wonderland Corridor”. The policies of the servicing approach for the Wonderland Corridor should be reflected accordingly.</p>
--	---	--

# Appendix B

Southwest Landowners Plan

# Appendix C

## Retail Market Demand Commentary



# Appendix D

## Servicing Brief