

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	"The buildings and public spaces constructed within the study area will directly respond to the design of the public right-of-way."	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)	"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> .	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.
20.5.3.9 iii)	"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> <ul style="list-style-type: none"> • <i>the principal public entrance should provide direct access onto the public sidewalk;</i> • <i>the primary windows and signage should face the street;*</i> 	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.
20.5.3.9 iii)	"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>	This refers to the second e) in the current draft; it should be referenced as g) in keeping with the lettering.
20.5.6 iii)	"a) Any expansions or additions to the Commercial or Office designations shall be limited to the lands fronting Wonderland Road South,	This policy would have to be revisited, and modified as necessary, to reflect the designation of Greenhills' site as "Commercial" within the

	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 120,000m² 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" "j) <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>
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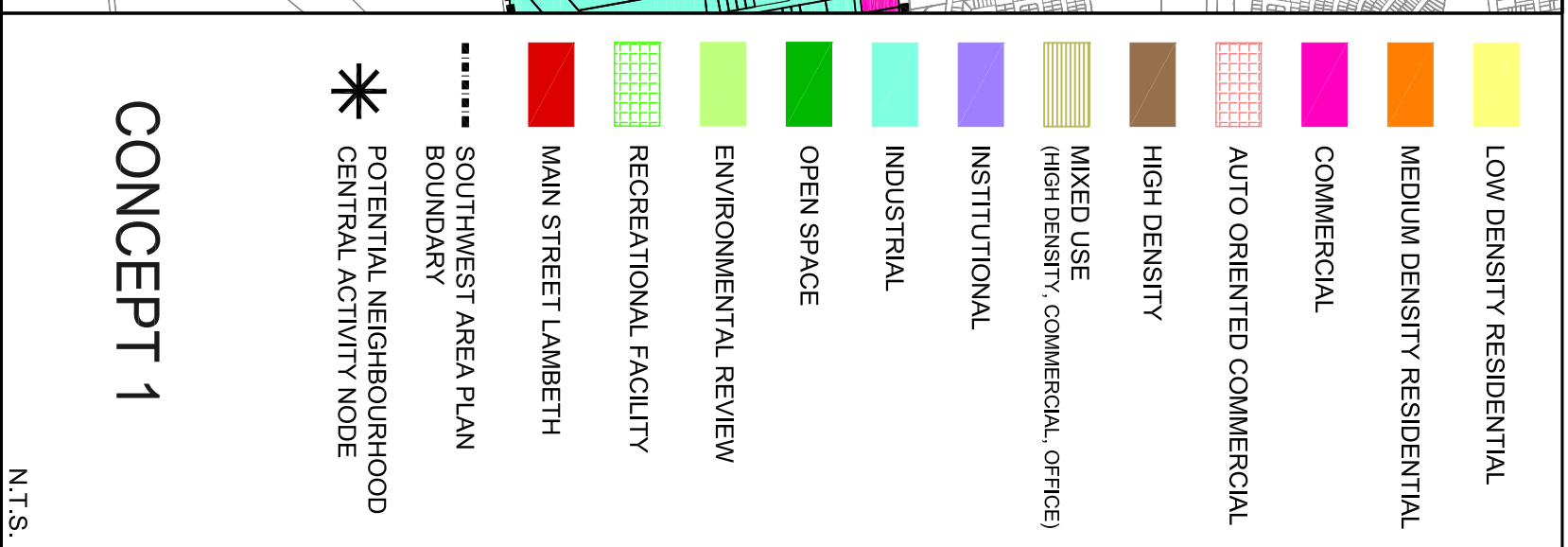
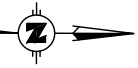
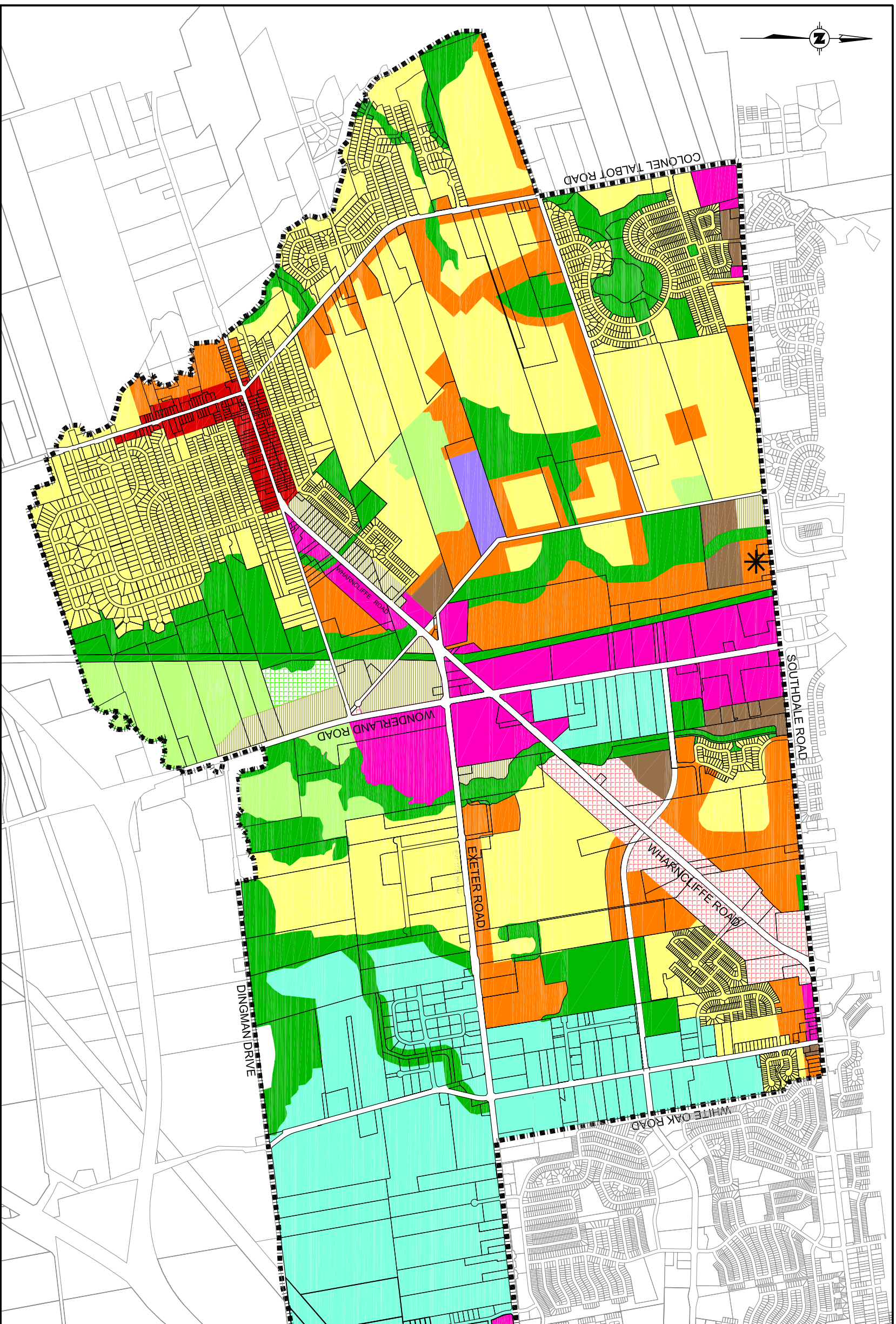
Appendix B

Southwest Landowners Plan



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CONCEPT 1

N.T.S.

Client/Project
 SOUTHWEST LAND OWNERS GROUP
 & LAMBETH COMMUNITY ASSOCIATION

Figure No.
 1.0

Title
 LAND USE PLAN
 AUGUST 27, 2012

Appendix C

Retail Market Demand Commentary



Mr. Joshua Kaufman
Vice President, Development
Greenhills Shopping Centre
700 Applewood Cres., Suite 100
Vaughan, ON
L4K 5X3

August 31, 2012

**Re: Greenhills Shopping Centre
Retail Market Demand Commentary
Southwest Area Plan, City of London**

Dear Mr. Kaufman:

Greenhills Shopping Centre (Greenhills) is proposing a 670,000 square foot retail development on its lands located at the southeast corner of Wonderland Road and Exeter Road in the City of London (Greenhills Site). These lands are located within the City's South West Area Plan (SWAP). Tate Economic Research Inc. (TER) has been providing retail market analysis services to Greenhills since 2006.

The purpose of this letter is to summarize TER comments relating to the following:

- Market demand for retail space in Southwest London;
- Allocation of Dingman Drive / Wellington Road retail space to SWAP; and,
- Role of retail commercial space in Lambeth.

Market Demand for Retail Space in Southwest London

Kircher Research Associates Ltd. (Kircher) was retained by the City of London to prepare a report entitled "Retail Market Demand Analysis for the South West Area Plan (SWAP), City of London, Ontario". This report is dated May 15th 2012. TER has a number of concerns with the methodology and conclusions of this report. However, only one of our concerns will be addressed in this letter.

One of the major issues TER has with respect to the Kircher report is that the full residential buildout is not accounted for in the Kircher analysis. Kircher's recommendations for the warranted space in the SWAP are based on a 2026 population of 22,500 persons. However Kircher notes a full build out population of 48,770 persons. The Kircher recommended 995,000 square feet is based on

46.1% of the full build out population. No longer term, or full build out, forecasts have been undertaken. In our opinion, this approach is inappropriate and has resulted in significantly understating the amount of warranted retail space in the SWAP. Notwithstanding the Kircher recommendation of 995,000 square feet of additional commercial space in the SWAP, City staff has recommended 3,055,482 square feet.

Allocation of Dingman Drive / Wellington Road retail space to SWAP

The SWAP presented at the public open house on June 27, 2012 indicates existing commercial designations near Wellington Road, south of Highway 401. There are two designations, Wellington / 401 with 788,705 square feet and Wellington / Dingman with 272,529 square feet (Wellington South of 401 Sites). Combined, these two sites represent 1,061,234 square feet of designated but not built commercial space.

Currently, the only anchor tenant in the Wellington / 401 area is Costco. On the west side of Wellington Road, there is a freestanding Home Hardware store and a strip retail centre formerly anchored by a department store which has been remerchandised into Value Village (used goods store), World Class Carpets and Gold's Gym among others. On the east side of Wellington Road is the Superstore Mall, formerly anchored by a large supermarket. The enclosed portion of the Superstore Mall has retail store, some office uses and is predominantly vacant.

With the exception of Costco, retailers have not been successful operating near the Wellington South of 401 Sites. There are no existing or planned residential communities located in the vicinity of the Wellington South of 401 Sites.

We recognize that the Wellington South of 401 Sites are located within the boundaries of SWAP. However, geographically, these sites are somewhat isolated from the balance of the SWAP. These sites are located south of Highway 401 with a significant portion of industrial lands existing and planned between the new residents of SWAP and these sites. Furthermore the Wellington South of 401 Sites will have a regional customer draw due to the existence of Costco and the Highway 401 visibility and accessibility.

It is our opinion that the Wellington South of 401 sites will not predominantly serve residents of the SWAP. Existing and new SWAP residents are more likely to shop along Wonderland Road than at Wellington South of 401. Therefore, it is inappropriate to include the entire 1,061,234 square feet of designated space as commercial space likely to serve residents in the SWAP.

This opinion is supported by research in the Kircher report. Kircher conducted a licence plate survey of vehicles in the parking lot of the Costco located on Wellington Road, south of Highway 401. The Kircher licence plate survey results indicated that less than 50% of Costco customers live in the entire City of London. Only 3% come from the SWAP. It is reasonable to expect that any of

the proposed 1,061,234 square feet of commercial retail south of Highway 401 at Wellington would have a similar dispersed customer draw.

The following table has been prepared by TER. It summarizes our estimate of the “effective” retail commercial space that will be supported by SWAP residents.

SWAP Presentation			
	SWAP Retail Space	SWAP Assumption	Total Space Supported by SWAP
Existing Designated Commercial ⁽¹⁾			
Wellington South of 401	1,061,234	100%	1,061,234
Other SWAP	970,619	100%	970,619
Proposed New Commercial	1,023,629	100%	1,023,629
Total	3,055,482		3,055,482
	SWAP Retail Space (A)	TER SWAP Assumption	Total Space Supported by SWAP (B)
Existing Designated Commercial ⁽¹⁾			
Wellington South of 401 ⁽²⁾	1,061,234	15%	159,185
Other SWAP	970,619	100%	970,619
Proposed New Commercial	1,023,629	100%	1,023,629
Total	3,055,482		2,153,433
Total Residual Space (A-B)			902,049

Source: TATE ECONOMIC RESEARCH INC.

¹⁾ Based on South West Area Plan Public Open House presentation, June 27, 2012. Slide 42.

²⁾ TER estimate based on portion of London residents in SWAP assuming full build out of SWAP in 2041 (48,770 / 572,100 = 8.5%). This estimate also recognizes that the Kircher Research Associates Ltd. licence plate survey indicated 49.6% of Costco shoppers reside in the City of London. To estimate the portion of support at Wellington South of 401, TER applied 8.5% to 49.6% = 4.2%. In order to recognize proximity to the site and ease of access for SWAP residents, TER has estimated that SWAP residents will ultimately support approximately 15.0% of the retail space designated at Wellington South of Highway 401

The analysis indicates that approximately 15.0% of the commercial space designated at the Wellington South of 401 Sites will be supported by SWAP residents. If one were to assume that the 3,055,482 square feet of commercial designated and proposed in the SWAP is the appropriate figure, this analysis indicates demand for an additional 902,049 square feet of commercial space in other areas of the SWAP more proximate to the residential development within SWAP.

The Greenhills Site is an appropriate location to accommodate a portion of this commercial space. It is located at the intersection of two major roads in the SWAP, Exeter and Wonderland. The Site will have future residential units nearby, in all directions. Retail space at the Greenhills Site would be more

accessible to SWAP residents than the Wellington South of 401 Sites, which can be expected to serve a market that is City-wide and beyond.

Role of Lambeth Retail Commercial Space

Lambeth has a retail commercial role and structure that is differentiated from the existing retail centres on Wonderland Road and what is proposed in the SWAP. Lambeth's role as a retail commercial area can be described as convenience oriented and primarily focused on serving local customers.

TER conducted an inventory of competitive retail and service space in the community of Lambeth in 2009. In 2012, we conducted an inspection of each retail and service unit in Lambeth. Based on this review and the vacancy figures outlined below, it is TER's opinion that the Lambeth market is underserved with respect with retail offerings.

There is a limited range of retail space in Lambeth, although there appears to be a variety of successful retailers and service providers. Much of the retailing in Lambeth tends to be convenience oriented. However, there are some unique stores in Lambeth, such as Greenhawk Harness and Equestrian Supplies and Lambeth Rod and Tackle, that, we expect, are not convenience oriented and, instead, attract customers from a wide area. In addition, local residents tend to shop elsewhere in London for comparison type goods such as clothing.

The retail commercial space in Lambeth is more service oriented than the retail centres on Wonderland Road. The Kircher inventory indicates that service space in Lambeth represents approximately 40.0% of occupied space. Service space at Wonderland Corners and Westwood Power Centre represents approximately 12.7% of occupied space. Services tend to be convenience oriented and this variation in the tenant composition indicates the different nature of the retail commercial space in Lambeth compared to Wonderland Road.

The existing retail centres on Wonderland Road and proposed in the SWAP will tend towards national chains and larger format stores. For example, TER's research indicated that the average retail commercial unit in Lambeth is less than 2,000 square feet. Wonderland Corners and Westwood Power Centre include some large stores such as Loblaws at 127,000 square feet and Home Depot at 130,000 square feet. The average unit size at these two centres is approximately 18,000 square feet. This variation in unit size reflects the different role of Lambeth compared to the Wonderland Road area.

Vacancy levels are one of the performance measures of any retail commercial area. The Kircher report indicates that Lambeth has a total of 213,000 square feet of retail and service space and 11,400 square feet of vacant space, resulting in a vacancy level of 5.4%. TER considers this level of vacancy to be in the lower ranges of a balanced market, which normally is between 5.0% and 7.5%. Therefore, this vacancy level indicates a healthy, balanced market.

The retail commercial role of Lambeth is differentiated from the retail centres existing and proposed in the SWAP. These differences include personalized customer service, unit sizes, the portion of the retail commercial space occupied by services and unique stores versus national chains. As a result, we expect there will be little impact on the Lambeth retail commercial area as a result of the new retail proposed in SWAP.

Conclusion

This letter has outlined the following points relating to retail commercial planning in the SWAP:

- The Kircher report has understated demand for retail space;
- Taking into consideration the additional space identified by staff, It is inappropriate to include most of the 1,061,234 square feet of commercial space designated at Wellington South of 401 as it will serve a regional market much broader than the SWAP and will not be attractive to future residents of the SWAP in comparison with retail facilities along Wonderland Road;
- Lambeth retailing is primarily convenience oriented and serves a different function than the existing and proposed retail centres on Wonderland Road. Further commercial development along Wonderland Road will have little impact on Lambeth retail commercial areas.

When these factors are jointly considered, 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 670,000 square foot retail development, as proposed.

Yours truly,
TATE ECONOMIC RESEARCH INC.



James P. Tate
President