



KITCHENER
WOODBRIDGE
LONDON
KINGSTON
BARRIE

October 12, 2012

The Corporation of the City of London
P.O. Box 5035
300 Dufferin Avenue
London, ON N6A 4L9

Attention: Councillor Bud Polhill, Chair, Planning and Environment Committee and Members of Committee

Dear Sir/Madam:

**RE: City of London Southwest Area Secondary Plan
1279059 Ontario Inc. (York Developments), CLF 1 (Wonderland Road) Inc.,
1699259 Ontario Inc., and E. and E. McLaughlin
3313 - 3405 Wonderland Road South
OUR FILE 1094'A'**

MHBC has been retained by the ownership group noted above to evaluate the draft Southwest Area Plan (SWAP), dated October 2012. Their land holdings comprise approximately 50 acres along the west side of Wonderland Road between Southdale Road and Wharncliffe Road. We have been actively involved in the review of the previous draft documents and have provided comments throughout this process.

Based upon our review, to date, of the current Secondary Plan, it would appear that some of our previous concerns with the SWAP have been addressed in this revised document. In this respect, City staff should be commended for their efforts to design a comprehensive plan which balances the diverse interests of all stakeholders.

Summary of Identified Concerns:

Notwithstanding, in relation to this development site we have identified three components of the Secondary Plan which, we believe, require further consideration by the Committee:

- 1. Wonderland Road Enterprise Corridor.** The Enterprise designation has been introduced to create opportunities for a broad mix of commercial, office, residential and institutional uses without specific locations for these uses. However, the plan

establishes a 100,000 m² gross floor area 'cap' on commercial development (with certain exceptions). This restriction does not appear to be in keeping with the overall intent of this flexible land use designation. Additionally, the policy does not appear to be derived from the findings of the Retail Market Demand Analysis prepared by Kircher Research Associates. The introduction of a floor area cap is an arbitrary limit that does not further the objectives of the enterprise corridor and should be removed.

2. Wonderland Road South Reconstruction. The SWAP proposes to reconstruct a section of Wonderland Road to provide a six-lane road cross section incorporating features such as through lanes, 'slip off' lanes, on-street parking and extensive landscaping. We have previously expressed concerns with this design concept, most notably:

- The road widening required for this 'main street' design represents a significant burden for adjacent landowners and should not proceed without adequate compensation;
- The channelization of through traffic will limit the viability of adjacent lands for commercial enterprises;
- The success of this concept is entirely contingent upon the City's commitment to complete this roadwork in the near term.
- The extensive cross section does not create a 'pedestrian friendly' environment which is one of the guiding principles of the SWAP document.

3. Conceptual Local Street Network

The Plan proposes a local road network to ultimately connect into the Wonderland Road corridor. These local road connections are shown to traverse our clients lands which are intended to develop as a mixed commercial centre. The Plan prescribes how road rights-of-way would be dedicated and where encroachments would be permitted to allow property owners to use rights-of-way in advance of local street construction. We question both the practicality and feasibility of establishing a series of local streets through a commercial complex. This will create a patch work of development parcels and introduce unnecessary traffic into a pedestrian focused centre.

Recommendations:

To address these concerns, we offer the following recommendations:

- **Wonderland Road Enterprise Corridor.** We propose that in keeping with the purpose and intent of the new Enterprise designation, the policy restricting total commercial/retail space should be removed from the Plan. Given the City's long standing policies regarding office development, we see merit in keeping some limitation on office floor area along this corridor in order to maintain the downtown as the primary office area in the City.

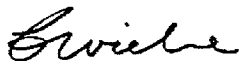
- **Wonderland Road Reconstruction.** In our opinion, a prominent gateway could be created utilizing a 40 m wide arterial road allowance and supported by enhanced design features. We recommend that this proposal be investigated further. This represents a more efficient utilization of infrastructure and land that can be implemented at a significantly more affordable cost.
- **Conceptual Local Street Network.** The policies and concept plans intended to promote a local street network should be considered in the context of 'second generation' redevelopment plans. Over time, as densities increase and residential opportunities are explored, the introduction of local streets can be considered. However, it does not reflect market realities in the short term.

The enclosed Schedule 1 illustrates how the draft Secondary Plan could be amended to implement the noted recommendations.

We trust that the information presented will assist with the Committee with its review of the Southwest Area Plan. Should you need additional clarification on the matters discussed, please contact the undersigned at your earliest convenience.

Respectfully Submitted,

MHBC Planning



Carol M. Wiebe, BES
Partner

Schedule 1
PROPOSED AMENDMENTS

to the

DRAFT SOUTHWEST AREA PLAN FOR THE CITY OF LONDON

A. THE AMENDMENT

1. Draft Policy 20.5.6.1 v) - 'Built Form and Intensity – Commercial Development'

As a result of this amendment, the proposed Built Form and Intensity – Commercial Development policies are modified by removing the following draft policy:

- a) ~~Commercial development for the entire Wonderland Road Enterprise Corridor designation shall not exceed 100,000m² gross floor area. For the purposes of this limit, this shall not include those lands generally located north of the Bradley Avenue extension that are currently developed or are approved/under construction as of October, 2012.~~

2. Draft Policy 20.5.3.8 iv) - 'Design for Wonderland Road South'

As a result of this amendment, the intent of the policies and design concepts proposed for Wonderland Road South are modified by amending the following draft policy:

a) Intent

As the primary gateway to Central London from the 400 series Highways, Wonderland Road South will be developed with an ~~non-standard six-lane~~ arterial road cross section. The intent of this design is to fulfill the two functions of this major transportation corridor – as a major arterial designed to carry high volumes of traffic in a safe and efficient manner, and as a major gateway and arrival corridor into the City. Wonderland Road South will serve as the spine of the Southwest Area, and will link both the existing and newly developing neighbourhoods within the area to one another and to the rest of the City. For these reasons, a high design standard, including landscaping, medians, opportunities for on-street parking and bicycle lanes, and local street connections will be provided within the ~~a widened~~ road allowance.

~~Based on a six-lane profile, conceptual designs have a minimum of two through-lanes in each direction within the Southwest Planning Area to carry traffic through the area in a safe and efficient manner. Where feasible, the third lane in each direction is designed as a parallel frontage street, allowing for local streets to run to the east and west directly from the arterial road right-of-way.~~

~~This design allows for the slowing of traffic, and the creation of an intimate pedestrian street environment adjacent to the development along the corridor. Bicycle lanes and onstreet parking within the frontage street, and a wide landscaping strip planted with trees and other vegetation between the through-lanes and the frontage street lane, will contribute to the sense of enclosure and the pedestrian feel for this area, while~~

~~supporting street oriented development and front door opportunities. Building setbacks and design elements as set out in Section 20.5.3.9 of this Plan, will relate to this design to provide an effective interface between the public and private realms.~~

The through lanes in either direction ~~may~~ will be divided by a wide raised median developed as a showcase of landscaping and trees, providing amenity for the street and enhancing this corridor as a significant gateway to the city that is representative of the Forest City. The anticipated minimum right-of-way width requirement is ~~40~~ 57 metres.

~~b) Design Concepts~~

This draft policy is deleted in its entirety.

3. Draft Policy 20.5.6.1 iii) - 'Development Pattern/Local Street Connections'

As a result of this amendment, the policies for the proposed local street connections for the 'Wonderland Road Enterprise Corridor' are modified by amending the following draft policy:

iii) Development Pattern/Local Street Connections

In order to establish an organizing structure for ~~the present and future~~ development for lands within the "Wonderland Road Enterprise Corridor" land use designation, local street connections shall be established perpendicular to Wonderland Road South for the full width of the blocks adjacent to both the east and west sides of Wonderland Road South as part of the ~~development or~~ redevelopment of any lands within the Wonderland Road Enterprise Corridor. Local street right-of-way dedications shall be consistent with the Conceptual Network of this Plan. The City may enter into an encroachment agreement with the property owner for the use of the local street right-of-way in advance of its development as a local street.

Local street right-of-ways shall be dedicated for any ~~development or~~ redevelopment within the Wonderland Road Enterprise Corridor. The dedication shall occur as a condition of a plan of subdivision or consent. Where the ~~development or~~ redevelopment of the site is subject to site plan control, land area dedicated to the city for right-of-way will be included in the lot area calculation permitted density, coverage and floor area. Internal access and shared internal driveways across adjacent lands shall be required.

B. PROVISIO

The amendments to the draft policies of the Southwest Area Plan apply to any other modifications necessary to give the full effect to the amendments described herein.