



June 5, 2012

Planning Division, City of London
P.O. Box 5035
300 Dufferin Avenue
London, ON N6A 4L9

sent via email to: GBarrett@london.ca

Attention: Mr. Gregg Barrett

Re: Southwest Area Plan ("SWAP") / Andover Additional Commercial – southwest corner Wharnccliffe Road and Bradley Avenue 27 acre site (the "New Urban Site")

Dear Mr. Barrett:

I have been following the SWAP activities of the planning department with great interest and concern and thought it appropriate to formally address these concerns to your attention.

I am the President of New Urban Retail Inc. and the controlling entity of lands totalling approximately 27 acres of land located on the south west corner of Wharnccliffe Road and the future Bradley Avenue (the "New Urban Site"). I have been working with the current owner of these lands, Sifton Properties Limited, on completing an application for a rezoning of these lands. It is my intention to pursue the development of a high quality retail shopping centre on these lands.

I would like to highlight the importance of ensuring that the existing designated commercial node located at the intersection of the New Urban Site is appropriately protected against the arbitrary expansion of commercial retail supply in south west London. My company's decision to pursue the New Urban Site was based on a thorough investigation of the existing planning designation hierarchy in the City of London Official Plan and identified it as the only serviced site in the south west that had the most of the appropriate land use permissions to facilitate commercial retail development of in excess of 300,000 square feet. Based on recent drafts of the SWAP there appears to be little regard to the availability of existing designated lands and the realities of retail demand in south west London. One of the clear objectives of the official plan is to ensure the utilization of existing lands and facilities that are in or adjacent to existing neighborhoods. This goal, clearly, is paramount to the alternative of expanding or creating new zones that require significant infrastructure expenditure and in turn re-designating or rezoning lands that are tantamount to encouraging urban sprawl. Further still, the potential for re-designating other lands from industrial/office employment to permit significant new retail development at the expense of existing designated sites or facilities is unsustainable planning and counter to provincial employment land policy.

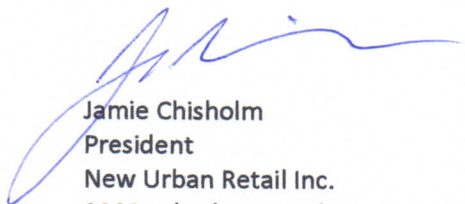
My key points of concern that I would like the planning department to consider are as follows:

- Approximately 20 acres of land on the subject site is zoned for retail commercial and has servicing allocation in place. The additional 7 acres are immediately adjacent and have sewer allocation. A site of this size will more than adequately accommodate known near term demand for south west London.
- The extension and creation of Bradley Avenue between Wonderland and Wharncliffe fulfills a long standing transportation planning objective and creates an effective link to the existing neighbourhood and commercial facilities. It is also worth noting that the benefit of creating this link will be profound during the anticipated construction and widening of Southdale Road alleviating what will be significant congestion during construction. It will also help to mitigate business disruption to existing area businesses during construction.
- Municipal revenue/cost implications: In order to facilitate the potential retail and commercial expansion being considered in the SWAP, it has been estimated that municipal infrastructure expenditures would be in excess of not less than \$85 million. Other than the Bradley Avenue extension, the costs of which will be more than offset by the development charge revenue created by the subject site, no further public works or expenditure are required to accommodate the development of in excess of 300,000 square feet at the New Urban site.
- Further retail lands expansion will have potentially significant economic impact to the value and viability of the New Urban Site and other existing retail nodes. Approval of new large parcel commercial tracts along Wonderland and Exeter could encourage a hollowing out of existing retail nodes along Wharncliffe Road extending north from Southdale Avenue. In addition, a disproportionate amount of commercial retail approvals in the south west area could also have weakening impacts to the Wellington Road corridor.
- Insisting that existing serviced and designated parcels be developed first in advance of approving new areas does not preclude expansion of commercial retail areas when demand is warranted in the future. Leap frogging development permissions for new sites at the expense of existing sites and that are further removed from existing residential and commercial neighbourhoods is simply not sound planning.
- By ensuring the priority development of the New Urban Site, it provides the opportunity to connect the existing retail nodes along both Wonderland and Wharncliffe thereby enhancing and protecting each node and creating the opportunity for effective traffic links and direct connection to existing neighbourhoods.
- The subject site provides an immediate opportunity for the known demand for home improvement, department store, and neighbourhood commercial uses with effective transportation links and adjacency to both residential and retail areas. Again, all of this can happen without expensive and potentially unsustainable expansion of public works.

In conclusion, it is our hope and reasonable expectation that priority consideration be given to the New Urban Site to ensure the timely delivery of "in demand" retail without the necessity for the City to incur significant capital expenditures and risking weakening existing designated, zoned, and serviced nodes.

I would be please to meet or discuss this matter further with you or members of your team at your convenience.

Sincerely,



Jamie Chisholm
President
New Urban Retail Inc.
2999 Lakeshore Boulevard West
Toronto, Ontario M8V 1J8
Email: Jamie.chisholm@cogeco.ca

416-317-1330

Cc Mr. Phil Masschelein, Sifton Properties Limited