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January 10, 2020
File No.: 129002.1001

By E-mail
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City Council
City of London
300 Dufferin Avenue
London, ON N6A 4L9

Attention: Ms. Lauren Morris, Administrative
Assistant

Dear Mayor Holder and Members of Council:

**Re: Item 8.1(3.3) – 1830 Wharncliffe Road South (the “Shanaa Lands”)
File No. Z-9107
Letter of Concern**

We are counsel to York Developments and North American Development Group, the developers of the lands municipally known in the City of London as 3313-3405 Wonderland Road South and 1789 Wharncliffe Road South. Our clients' properties are located at the northwest corner of the Wonderland Road South / Wharncliffe Road South intersection, to the north of the Shanaa Lands.

On behalf of our clients, we wish to express concerns regarding the Zoning By-law Amendment proposed for the redevelopment of the Shanaa Lands.

As noted in the staff report, dated January 6, 2020, the Shanaa Lands are located within the Southwest Area Plan (the “**SWAP**”), which establishes a 100,000 m² cap on commercial gross floor area across the entirety of the SWAP lands (the “**Commercial Cap**”). The Commercial Cap has already been fully allocated across the SWAP area.

We note that with respect to the Commercial Cap, staff have apparently allocated 1,745.5 m² of commercial GFA to the Shanaa Lands, based on a 30% lot coverage calculation—but that the zoning by-law amendment advanced before Council does not contain any restrictions on maximum GFA. There is therefore no mechanism in the zoning to ensure that the redevelopment of the Shanaa Lands respects the Commercial Cap.

As well, we note that the redevelopment proposal for the Shanaa Lands provides insufficient parking to meet the required parking for several of the uses proposed in conjunction with the requested zoning. It is troubling that the applicant has not conducted a parking study to evaluate the transportation impacts of its proposal, nor has the applicant provided any justification for the additional uses in the absence of adequate parking supply.

In our view, absent a parking and transportation analysis in support of the additional development permissions sought, this development application for the Shanaa Lands is premature and should be refused.

Stikeman Elliott

Please provide us with notice of all upcoming meetings of Council and Committees of Council at which the Shanaa Lands will be considered, and we ask to be provided with notice of Council's decision with respect to this item.

Yours truly,



For Patrick G. Duffy

PGD/jsc

cc. Client