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March 15 2013

The Corporation of the City of London
P.O. Box 5035
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**Attention: Councillor Bud Polhill, Chair, Planning and Environment Committee and
Members of Planning Committee**

**Regarding: Application by Sifton Properties – 1311, 1363 and 1451 Wharncliffe Road South,
Application OZ- 8087**

Dear Sir/Madam:

We have reviewed the Staff Planning Report for the above-referenced OPA/ZBA application and wish to express several concerns with both the proposal submitted by Sifton Properties Limited and the processing of the application. Our key concerns in this respect are itemized below:

Summary of Key Concerns:

1. **Application Processing.** We noted that Development Services Division processed the OPA/ZBA application rather than the Community Planning section of the Planning Division. This was surprising, considering Community Planning is responsible for long-range planning matters and is also coordinating the Southwest Area Plan (SWAP) process.

Staff have advised that Development Services processed the application as the property is part of an approved draft plan of subdivision. However, based upon the analysis of the staff report, it would appear that Community Planning did not have direct input into the assessment of this application. Given that this proposal impacts upon the commercial framework established through OPA 438 and the Council-approved SWAP, it is imperative that the opinion of Community Planning be obtained in relation to the nature and intent of this application.

2. **Commercial Structure.** The application would introduce a nodal configuration into the commercial corridor applying to virtually the entire length of Wharncliffe Road South. This would fundamentally change the existing commercial structure developed through OPA 438 and retained through the SWAP. It would also represent a significant departure from the policy direction and development permissions prescribed for the site.

3. **Southwest Area Plan (SWAP).** The OPA/ZBA application was accepted in August 2012 during the course of the SWAP planning process. Several modifications were made to the SWAP land use plan between the submission date and Council's approval of the Secondary Plan (November 2012). We believe staff should clarify why the proposal was not integrated into the SWAP and why the Secondary Plan does not include any other new Community Commercial Nodes.
4. **Retail Market Demand.** The staff report does not contemplate the implications of this proposal in relation to the retail market analysis conducted by Kircher Research for the SWAP. Furthermore, the market study prepared for this application does not address the findings of the Kircher report or the potential impacts of this proposal on the planned Wonderland Road Community Enterprise Corridor. These details are essential to permit a full review of the proposal.
5. **Planned Function.** The application proposes large format commercial anchors similar to those permitted in the existing Southdale/Wonderland 'New Format Regional Commercial Node' and proposed for the Enterprise Corridor designation. In effect, the trade areas for the proposed 'Community Commercial Node' will directly compete with these regional commercial nodes. This is not in keeping with the intent of the commercial hierarchy developed as part of OPA 438.
6. **High-Density Residential Uses.** The requested zoning and associated concept plans do not contemplate high density residential development. As the SWAP provides limited opportunities for high density residential units, further analysis is needed to assess the impacts of the proposal on the housing targets developed for the Southwest Planning Area.

In summary, the proposal will substantially increase the range and scale of retail uses on the subject lands while also facilitating large format commercial activities on lands planned for high-density residential development. In our opinion, the intended uses for this site are not consistent with the types of auto-oriented enterprises existing and planned for this corridor. These uses would also conflict with the commercial hierarchy set out in the Official Plan and the Council-approved SWAP.

Given these considerations, we request the Committee deny the proposal in its current form. We also request notification on any decision with respect to the application. Should you have any questions or concerns, please contact the undersigned at your earliest convenience.

Respectfully submitted,

Yours Very Truly,



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