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September 16, 2021

Heather Lysynski
Committee Clerk
City Clerk's Office
City of London, City Hall
300 Dufferin Avenue
London, ON N6B 1Z2

Attention: Planning and Environment Committee

**Re: Proposed Zoning By-law Amendment, City of London File: Z-9356
755 – 785 Wonderland Road South, Westmount Mall**

We act on behalf of Farhi Holdings Corporation (the “**Client**” or “**FHC**”) and have been retained to review and comment on the proposed zoning by-law amendment as it relates to the 755 – 785 Wonderland Road South (the “**Westmount Mall**”) to: (i) add business service establishment as a permit use to permit call centres, customer service field offices or other businesses that operate on a fee or contract basis such as advertising, mailing, building maintenance, employment services, or (ii) increase the maximum cap for office space in the zone (the “**Proposed Zoning By-law Amendment**”).

We ask that the Planning and Environment Committee (“**PEC**”) receive and review these written comments when considering the Proposed Zoning By-law Amendment. FHC is submitting these comments for consideration at the public participation meeting scheduled for Monday, September 20, 2021. We reiterate and rely on our submissions to the City of London (the “**City**”) on the Proposed Zoning By-law Amendment dated June 29, 2021 and attached to the City’s staff report.

We have reviewed the City’s staff report and support the recommendation that the Proposed Zoning By-law Amendment be refused.

We also enclose a letter from Scott Allen, MA, RPP, of MHBC, Planning Urban Design & Architecture, advising that Westmount Mall may currently have approximately twice the permitted gross leasable floor area permitted under the City’s policies and plans to be

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allocated to office uses. This supports the position set out in the City's staff report that the existing office space in Westmount Mall does not comply, and exceeds, what is permitted. The limit of suburban office space is set out in The London Plan, 1989 Official Plan, Council's Strategic Plan, the Downtown London Plan and the numerous other plans, policies and City endorsed documents to support the protection of Downtown office space market including but not limited to the Community Improvement Plan and Core Area Action Plan.

The protection of the Downtown office market is consistent with the City's policy framework requiring that any suburban office space be restricted to protect the important Downtown office market.

In light of these considerations, we support the City's refusal of the Proposed Zoning By-law Amendment. The Proposed Zoning By-law Amendment does not align with the policy direction and permissions of the City's applicable planning framework, fails to protect the Downtown Core Area and Downtown office market, and does not represent good planning.

Our opinion is based on the information submitted to date and we preserve our Client's right to raise any additional issue that may arise upon further review and consideration. Should you have any questions or concerns, please do not hesitate to contact us.

Yours very truly,

Siskinds LLP



e-signature

Per:

Paula Lombardi
Partner

c: Client
C. Parker