

ECAC COMMENTS ON LONDON PLAN CHANGES

B. Krichker, S. Levin, April 28, 2024

ECAC supports the changes to Map 5. We have consistently recommended that such land use and zoning changes take place concurrently with other land use changes because of an EIS or an EA. We continue to encourage the City staff to make this change in its process. This is already part of Policy 1335 of the London Plan.

Regarding Environmental Policy changes (Section 7 London Plan)

ECAC has no concerns with the “housekeeping” wording changes to reflect the relevant Ministry.

ECAC strongly recommends additional policies for the sections beginning with 1447 Flood Plain Lands and 1487 Riverine Erosion, in particular, as they relate to climate change. Although policy 1445(6) states: “Consider the potential impacts of climate change that may result in an increase of the risk associated with natural hazards,” neither the Flood Plain Lands policies nor the Riverine Erosion policies integrate climate change effectively. ECAC recommends that the following be included as a specific policy:

In order to monitor the changing climate, Subwatershed Studies must be updated and adopted by City Council at least once every ten years.

We are unclear as to whether the proposed changes to the hazard policies starting at policy 1442, are consistent with the Conservation Authorities Act. For example, it is our understanding that under the Conservation Authorities Act, a CA would be the authority to approve flood proofing measures in the flood fringe (policies 1448, 1462_2) or riverine or slope hazards (policy 1489, 1493) and wetlands (policy 1498).

Also, in 1452, 1460 and 1461, the City does not have the mapping. How can it be responsible for the delineation of the floodplain? Mapping across the Province has been done piecemeal since the 1980s, including in the local watersheds. It is known to be out of date for climate change. As well it is our understanding that legislatively, the CA has responsibility for this, not the City.

1463_4 – recently this was removed from Section 28 of the CA Act. The question will be what guidance will the City use to determine what is minor?

1485 what is the difference between consultation and cooperation?

1335 does the Ministry still need to approve an OWES evaluation?

1336 why does the amendment remove the part related to the London Plan policies on Natural and Human made Hazards? The City policies should continue to apply even if the Conservation Authorities no longer have regulatory authority.

1499 – there are two parts to this. If the first part related to mapping is removed, who then is responsible for identification? The second part may fall under the all-encompassing new 1444A, but not the first part.

ECAC would recommend that a policy be added such that an application that is required to conduct an EIS, that such application not be deemed complete until the City approves the required EIS.

1398, it is unclear why this change is necessary. Won't there be approvals from other public agencies from time to time? Perhaps better wording would be:

The City shall include methods for minimizing impacts when reviewing proposals to construct mobility, communication, sewerage or other infrastructure in the Natural Heritage System. The City shall consultation with other public authorities as required or advisable.

1441 re Sunningdale North

As the Area Plan and works preceded changes to the CA Act, no change is needed to this section.