

Dear Chair and Members of the Planning and Environment Committee, and Planning Department Staff:

Thank you for the opportunity to provide comments on Draft 2 of The London Plan. I understand these comments will be added to the agenda for the PEC meeting of June 22, 2015.

I am mainly interested in the Natural Heritage and other environmental policies that will guide planning decisions for London's Natural Heritage. Therefore, the following comments mostly concern policies in Parts 4 and 6, and Map 4 of The London Plan.

Sincerely,  
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**COMMENTS ON DRAFT 2 OF THE NEW OFFICIAL PLAN, THE LONDON PLAN**  
(by Anita Caveney)

**A. General Comments**

1. The Table of Contents needs more formal formatting. The titles of the Parts, Sub-parts, Chapters, Sections and Sub-sections should be numbered, in order to facilitate quick access to and cross-referencing among different Parts, Chapters, Sections and Sub-sections of the Plan.
2. This is a comprehensive Plan, which contains many sound policies for London, and appears to reflect many of the wishes of Londoners who participated in the ReThink London consultation process. I commend the drafting team of The London Plan, especially on the environmental policies in Part 6 — Environmental Policies. (London's Natural Heritage is my major focus of interest.)
3. In my Specific Comments below, I use "Item" to refer to numbered statements and policies in The London Plan.

**B. Specific Comments**

**Part 1 — Our Challenge**

- Item 42: "Our Challenge" should be in bold font. The second sentence needs correcting because there is punctuation and text missing after "Council". I assume the sentence was meant to have a comma followed by the word "who" after "Council".
- Item 47, **Part 1**: "Our Challenge" should be in bold font.

## **Part 4— City Building Policies**

### **Forest City**

- The policies in this Chapter are well drafted and should result in a much greener and healthier London.
- Item 324, 3: Thank you for giving the long-term sustainability and multiple woodland benefits, goods, and services of woodlands in parks priority over public access and recreation. This is a commendable policy.

### **Parks and Recreation**

- Item 341: Line 10 should say “recreational” (not “recreation”). The last sentence should say “Map 1— Place Types” (not Map 4). Please insert a cross-reference to Natural Heritage policies in Part 6, where more detailed descriptions of Natural Features are covered.
- Item 342: The wording of this Item is confusing and doesn’t clearly distinguish between significant and non-significant woodlands. I suggest that the first sentence should start with “Some”, and the second sentence should start with “Other, smaller woodlands . . .”. The last sentence may be less confusing if woodland areas in other park categories were referred to as “wooded areas” instead.
- Item 343: The second sentence should say “multi-use pathway systems” (i.e., singular “pathway”). I am very pleased to see the inclusion of the sentence that states “City-owned and/or managed ESAs are included in the City’s green space inventory; however, they are not programmed or managed as parkland.” Use a semicolon instead of a comma in front of, and a comma after, “however”, for clarity. In the last sentence, what does “dedicated above the normal parkland requirements . . .” mean?
- Items 341, 342 and 343: These natural heritage features should be shown on one of the Maps.
- Item 344: I suggest leading capitals be used for **Environmentally Significant Areas** (ESAs) in the London Plan, because they are commonly referred to as ESAs in the City and their significance should be emphasized.

## **Part 6 — Environmental Policies**

### **Natural Heritage**

- Item 1229: This policy can be used to support a “Big Picture” meta-corridor green space connection between Westminster Ponds/Pond Mills ESA and Tenants Pond ESA and Dingman Creek. See comment under **Part 9 — Maps**.
- Item 1235, 8: The wording is confusing. I suggest more restrictive wording be used to protect ecological sensitivities, such as “ Provide opportunities for appropriate recreational activities **only where** ecological sensitivities will not be adversely impacted.”

- Item 1243, 10: This item should be placed immediately following Item 1243, 3 (Provincially Significant Wetlands) on the Green Space PlaceType list.
- Item 1246: See comment on 2.1.5 Item 344 above.
- Item 1252: I suggest using leading capitals for **Provincially Significant Wetlands** (PSW), as used by the Ministry of Natural Resources and Forestry.
- Item 1255: Why is the Dingman Creek Fen Wetland Complex ESA not listed as a provincially significant ANSI, whereas it is delineated as such on Map 4, though the map legend doesn't show the classification?
- Item 1260: In the first sentence, the word "habitat" should be plural in Line 1, and the word "habitat" on Line 2 is redundant.
- Item 1269: Re-word the last sentence to say "Significant woodlands will be included in the Green Space Place Type on Map 1 and identified as significant woodlands on Map 4." (i.e., use plural with plural).
- Item 1272: Why is the Medway Creek in Medway Valley Heritage Forest ESA not shown in orange as "significant valleylands" on Map 4? It is listed as one of the creeks in Policy 1272 but is not shown on Map 4.
- Item 1274, 7: The wording of this sentence is too pro-recreation for a valleyland area, which likely has environmental sensitivities to be considered. I do not agree that there is necessarily an opportunity for a "logical extension" of the City's trail and pathway systems through a valleyland rather than an upland area nearby. This Item seems to be an incompatible consideration under Section 5.6.1 (Identification of Significant Valleylands).
- Item 1281, 1: "specialized habitat for wildlife" is listed twice in the list.
- Item 1286: The words in the first line need spaces added between them.
- Item 1300, 2: With regard to ESAs, I suggest adding a reference to the guideline document *Planning and Design Standards for Trails in Environmentally Significant Areas* (2012).
- Item 1321, 2.e: This policy supports my suggested extension of a "Big Picture" meta-corridor from Westminster Ponds/Pond Mills ESA to Tenants Pond ESA and Dingman Creek. See also comment 3.1.1 Item 1229 above, and under **Part 9— Maps**.
- Item 1326, 3: In the first sentence change "aones" to "zones".
- Table 15— Areas requiring Environmental Study: 4th bullet should say "Environmentally . . ."

## Natural and Human-made Hazards

Item 1350: Amend Map 5 to show the boundary of "Lower Thames **Valley** Conservation Authority"

## Part 9— Maps

### Map 4 — Natural Heritage

- Why does the City of London continue to misspell "Killaly" by using "Kilally"? This is disrespectful to Hamilton Hartley Killaly, an eminent Upper Canada politician and engineer, for whom the road and ESA in London were named. My understanding is

that London politicians who changed the spelling were uncomfortable with a word starting with “Kill” and decided to switch the position of the double “ll” to spell Kilally. This was an unfortunate decision.

- Why has Westdel Bourne Rd been shortened to “WESTDEL BRNE”?
- Change “Lower Thames Region Conservation Authority” to “Lower Thames **Valley** Conservation Authority” along the CA boundary.
- Why are there overlapping ESA boundary lines for Killaly Meadows ESA south of the Thames River and north of Kipps Lane, and for part of the East Lambeth ESA?
- Why is the name “Walkers Pond” used on the Maps instead of “Saunders Pond” in Westminster Ponds ESA? The Westminster Ponds/Pond Mills ESA Master Plan Update (2005) uses “Saunders Pond”.
- Why is the Significant Woodland west of Warbler Woods ESA, in the southeast quadrant of the Oxford St W—Westdel Bourne Rd intersection, not shown on Map 4? According to Schedule B1 Map 4 of the current Official Plan, there is also an Unevaluated Vegetation Patch in this quadrant to the west of the Significant Woodland, but it is also not shown on Map 4 of The London Plan.
- It would make sense to have a “Big Picture” meta-corridor linking Westminster Ponds/ Pond Mills ESA to Tenants Pond ESA and Dingman Creek. It would allow a “green” connection between the south branch of the Thames River and Dingman Creek. This would be shown as a pale grey corridor on Map 4. There is already a Provincially Significant Wetland south of Hwy 401 and north of Tenants Pond ESA. The connecting corridor would include an upland corridor already shown as a green triangle on Map 4. The connecting corridor would qualify as a linkage area, as described in policy 1321, 2e. On Map 5, this area is marked as “Highly Vulnerable Aquifer” and “Very Significant Groundwater Recharge”, giving further support to the concept of connecting Westminster Ponds/Pond Mills ESA with Tenant’s Pond ESA and Dingman Creek. Further support can be found in Policy 1229, which says “surface and groundwater features and hydrological functions are to be considered as a part of the systems approach to land use planning, consistent with the Provincial Policy Statement.” The Place Type of this connecting area would have to be changed from “Future Industrial Use” to Green Space.

### **Map 5— Natural Hazards and Natural Resources**

- Change “Lower Thames Conservation Authority” to “Lower Thames **Valley** Conservation Authority” on Map 5.