

TO: Ms. Cathy Saunders, City Clerk, City of London

FROM: Carol Agocs, 1454 Sprucedale Avenue, London N5X1J4

Date: June 15, 2015

**RE: London Plan – Public Participation Meeting  
Planning and Environment Committee**

I would like to commend the City's citizen engagement process concerning the London Plan. There have been ongoing opportunities for interested individuals and groups to be informed and to comment and make suggestions, and I appreciate that staff are engaging with public input.

My comments focus on the discussion of the Green Space Type and Natural Heritage Lands in Parts 4 (City Building Policies) and 6 (Environmental Policies) of the draft London Plan. The fact that natural heritage lands are discussed in two separate parts of the draft, Part 4 dealing with parks and Part 6 with environmental policies, creates confusion unless linkages are made between these two parts by cross-referencing.

The classification of lands within the Green Space Type includes Public Parkland and Natural Heritage – categories which overlap. Natural features that are owned by the City are classified as parks (Part 4), but I am pleased that the draft clearly states that these are “managed to protect, preserve and maintain their ecological function.” (sec. 4.17) For greater clarity I suggest that Sec. 341 contain wording to the effect that “city-owned components of the natural heritage system, while classified as part of the parks system, are governed and managed in accordance with the Environmental Policies section of the Plan (see Environmental Policies, Natural Heritage, sec. 1225-1230, 1240-1243)”.

Part 4.1.7.1, “Woodlands”, does not define Significant Woodlands or distinguish them from other woodlands. Clarity could be improved by adding a statement in Sec. 342 that refers the reader to Environmental Policies, Sec. 5.5, 1263-1269, where this information is provided.

Part 4.3, sec. 344, addresses Environmentally Significant Areas owned by the City. The statement that “these lands will be subject to the Natural Heritage policies of this Plan” could be further clarified by adding: “see Environmental Policies”, 4.0, sec. 1223, and 5.1, sec. 1246-1250, and 1325-1326”. I am pleased that Sec. 344 states that City-owned and/or managed ESAs “are not programmed or managed as parkland.”

Prior to the tabling of the final draft there is a need for careful reading to ensure accuracy, clarity and consistency throughout this complex document. With this in mind I look forward to the opportunity for citizens to assist by commenting on the final draft before it is presented to Council for approval.

I am also hopeful that the City will establish a robust system of monitoring and compliance measures to ensure that the leading Environmental Policies contained in the Plan will be implemented as intended.