

597 Kildare Road
London ON N6H 3H8
June 14, 2015

Ms. Cathy Saunders
City Clerk
City of London

Dear Ms. Saunders:

Re: London Plan – Public Participation Meeting

Following are my comments on the second draft of the London Plan. Please include these comments in the agenda package for the Planning and Environment Committee meeting scheduled for June 22, 2015.

I have a long-standing interest in the protection of natural areas in the City of London. My first submission to City Council was in 1970, when I addressed the protection of Westminster Ponds. Since that time, I have provided input to Council on many occasions regarding matters of environmental policy.

First, I commend the city for the consultation process it has undertaken in the development of the London Plan. Consultation is an essential part of the development of a new Official Plan, and the process undertaken for the London Plan has provided considerable opportunity for input.

In my review of the draft plan, I have concentrated on matters relating to protection of natural features. In this letter I am highlighting a few key concerns.

- I find it somewhat confusing to have information relating to protection of natural heritage features and areas in more than one location. Environmentally Significant Areas and Woodlands are discussed in Part 4, Sections 4.1 and 4.2, although the principal policies relating to these areas are presented in Part 6.
- In Section 4.2, policy 344 contains a clear statement that Environmentally Significant Areas are subject to the Natural Heritage policies, i.e., the policies in Part 6. Why is there not a comparable statement in Section 4.1.7 (policies 341 through 343)? Policies 341 through 343 address a group of city-owned lands that have natural values. I urge Council to add a statement in policy 341 stating, “These lands will be subject to the Natural Heritage policies of this Plan.”
- There is an error in the map reference in policy 341 – “Place Types” are shown on Map 1 as opposed to Map 4.
- In Part 6, I generally support the intent and the language relating to protection of the Natural Heritage System. There are many places, however, where the phrasing could be improved to enhance clarity. One example is in policy 1240, where the final sentence should be revised to read:
 - ***Where natural heritage features and areas are within the Green Space or Environmental Review Place Type, the Natural Heritage policies shall be read...***
- In policy 1326, paragraph 3, “aones” should be replaced with **zones**.

- Before the final plan is approved, a thorough review of the entire text must be completed, in order to remove confusing phrasing, misplaced pronouns, incorrect spellings, incorrect cross-references, etc.

In reviewing Map 4, I have identified some specific concerns relating to the Westminster Ponds area.

- The large pond immediately to the east of Wellington Road is labelled *Walkers Pond*. Although Walkers Pond is one of the historic names for this pond, the name applied in recent decades is **Saunders Pond**. The Saunders name was confirmed through the *Westminster Ponds – Pond Mills Conservation Master Plan Update*, approved by Council in 2005. Please change the label on Map 4 to read **Saunders Pond**.
- On a positive note, I see that the boundary of the Environmentally Significant Area to the north of Saunders Pond has been revised, in accordance with the recent consultant report. Conversely, I question the extent of the “Institutional” designation on the city-owned lands immediately east of Saunders Pond. The triangle-shaped parcel of land to the east of Saunders Pond was the subject of a cultural landscape plan entitled *Western Counties Health and Occupational Centre*. This plan was approved by Council in 2013, following earlier planning approvals that designated this land as Open Space. I would expect the lands around the foundations of the former veterans’ buildings to be Open Space, as approved by Council in April 2000. Please review and revise this designation.

I note that the comment period for the London Plan continues until early October. If, during the coming weeks, I identify additional issues, I will provide further comments.

Yours truly,

David Wake