

*"Inspiring a Healthy Environment"*

June 13, 2016

City of London – City Clerk's Office  
P.O. Box 5035  
London, Ontario N6A 4L9

**Attention: Heather Lysynski** (sent via e-mail)

Dear Ms. Lysynski:

**RE: UTRCA Comments – London Plan (May 2016)**

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The Upper Thames River Conservation Authority (UTRCA) appreciates the opportunity to provide input on the May 2016 London Plan and our staff would be pleased to meet to review the comments.

**OUR CHALLENGE**

P.43 – Bullet 2 – please include *wetlands* which are also regulated natural hazard lands.

**CITY BUILDING POLICIES**

Civic Infrastructure

P.476 f) – please be advised that no new development shall be permitted on septic systems in a Wellhead Protection Area WHPA 'A' or WHPA 'B' (Score of 10). Please include stronger wording to this effect.

Rapid Transit & Urban Corridors

P. 830 – 5 – greater intensities - Rapid Transit Corridor Place Types (Map 1) and potential Rapid Transit Boulevards (Map 3) are proposed within regulated natural hazard lands. As noted in our comments dated September 30, 2015 one proposed route/area is situated along Richmond Street between Epworth Avenue and Windermere Avenue in the flood plain of the Thames River. Another route/area is in the potential Again the UTRCA expresses concern regarding the potential conflict between the proposed policies which may allow for greater intensity and height of development in hazard lands which would not be consistent with the PPS.

**ENVIRONMENTAL POLICIES**

Natural Heritage

P.1283 – please incorporate Source Water Terminology – Highly Vulnerable Aquifers, Significant Groundwater Recharge Areas.

P. 1342 – please capitalize Significant Groundwater Recharge Areas (SGRA) and Highly Vulnerable Aquifers (HVA). Please note that the 'A' in HVA stands for Aquifer – not Area.

P.1342 – Map 6 which identifies the Source Water layers should include a note that this information comes from the Source Protection Plan which will be updated from time to time and that the information on the Map may be out of date and the local Source Protection Authority should be contacted to obtain the most current information.

Natural and Human Made Hazards

P.1425 - Bullet 1 – please add *wetlands* as they are natural hazards that are regulated by the local Conservation Authorities.

P.1431 – please revise the last sentence - *The approximate boundaries of the flood plain are identified on Map 6.*

P.1438 – please revise as the methodology for identifying the flood fringe has changed. Please refer to paragraph P.1440, sub paragraph 2 which correctly explains how the limit of flood fringe areas is determined.

P.1439 – please replace *some new* development with *limited* development.

P.1442 – 2. Please remove the terms *safe* (access) and *dry* (access) as the determination of the required level of access is the responsibility of the local conservation authority and will be made on a site by site basis, subject to the completion of appropriate technical studies.

P. 1443 – please consider replacing Upper Thames River Conservation Authority with the local conservation authority.

P. 1450 – please insert flood after Regulatory

P.1452 – 5. – last word *sites* to be replaced with *sides*.

P.1452 – 6 – please add sentence at the end – *Under the current PPS, institutional uses include hospitals, long-term care homes, retirement homes, pre-schools, school nurseries, day cares and schools.*

P. 1474 – 4. – Recently, there appears to have been some confusion regarding the interpretation of the six metre erosion access allowance. In accordance with Section 3.4 of the *Technical Guide – River and Stream Systems: Erosion Hazard Limit* OMNR 2002, “The erosion access allowance is the last component used to determine the landward limit of the erosion hazards and should be applied within all confined, unconfined and terrain-dependent river and stream systems.”

While we appreciate that City Planning Staff would like to provide clarity regarding this component of the riverine erosion hazard by simplifying the term to erosion allowance, the UTRCA recommends that the Provincially approved term *erosion access allowance* be incorporated into the London Plan. We are concerned that removal of the word "access" might lead some to wonder if a new term or phrase has been adopted either locally or Provincially. We will work with the City of London to pursue other means of addressing concerns related to the understanding of the constraints associated with erosion hazard lands.

Natural Resources

P.1532 – hydrogeological study (not hydrological study)

**OUR TOOLS**

p.1615. 5. – the UTRCA continues to recommend the term *activities* replace the term *land use*.

**MAPS**

Spelling - watercourse – to replace “water course”

**Map 5 Natural Heritage**

The blue shading of the Provincially Significant Wetlands makes them look like ponds or lakes – consider

changing.

As indicated in earlier comments on the London Plan, does the map include the features identified as being significant in the *Middlesex Natural Heritage System Study* (2014) which the City partnered on with the UTRCA? Difficult to see all of the features as the layering blocks some of them out.

### **Map 6 Hazards and Natural Resources**

Map 6 is very difficult to read. The UTRCA strongly recommends that the Source Protection layers and the Natural Hazard layers be presented on two different maps.

Please include a note advising that the most current Source Water Protection information is available from the local Source Protection Authority.

### **Natural Resources**

The Highly Vulnerable Aquifers should be outlined.

### **Hazards**

**Regulatory Flood Line** – please delete Note 2. The UTRCA does not have flood fringe mapping available.

**Riverine Erosion Hazard Limit for Confined Systems** – the note should be moved to Steep Slopes Outside of the Riverine Erosion Hazard Limit.

**Riverine Erosion Hazard Limit for Unconfined Systems** –difficult to locate these areas on the map due to all of the shading/hatching.

**Conservation Authority Regulation Limit** – the shading does not match up with the legend. On the map, the regulation limit is outlined with a heavy reddish/pinkish line. Please revise.

**Conservation Authority Regulation Limit**– please includes a note that the most current version of the Regulation Limit is available from the local Conservation Authority.

**Special Policy Areas & Potential Special Policy Area** – please include under hazard lands section of the legend.

Thank you for the opportunity to provide feedback on the London Plan. If there are any questions regarding our comments please contact the undersigned at extension 293.

Yours truly,  
UPPER THAMES RIVER CONSERVATION AUTHORITY



Christine Creighton  
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