

October 2, 2015

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Our File #: 13-601

Attention: Mr. John Fleming,
Managing Director, Planning and City Planner

Reference: Comments to the Second Draft of the London Plan (June 2015)

On behalf our client, The London Development Institute (“LDI”), we would like to thank City staff once again for the opportunity to provide comments on the London Plan through the circulation of the Second Draft this past June, 2015. In general, LDI was pleased to see revisions made to the plan which help to make it easier to navigate. LDI is; however, disappointed that many of the issues and comments that we provided through the first draft were not addressed. Perhaps it was that they were lost in translation from the assimilation with comments made by others.

Similar to our previous comments, the comments provided through this submission represent a compilation of issues and matters identified by LDI, its members, and input and analysis from professional consultants retained by the Institute to provide a technical review of the Second Draft of the London Plan on behalf of LDI. Through this review we have identified a number of key over-arching themes of concern as well as policy specific issues and recommendations that our client would like to see addressed in the Final version of the Plan.

The over-arching themes are identified below and the policy specific issues and recommendations have been provided in table format in the order they appear in the Plan with reference to paragraph number, an excerpt of the policy of interest, and identification of the issue, and in certain instances, suggested policy changes to address the concerns of LDI. **These two documents must be read together.** Please note that these comments are not exhaustive, and that additional comments may be provided based on responses to the issues identified and any future versions of the Plan.

Policy

Everything in the London Plan cannot be considered policy, dialogue on growth pattern is not policy, text provided for background information and context is not policy. The Plan needs to be revised accordingly as these matters cannot be implemented.

Prescriptive Language / Flexibility

LDI would like to thank the City for the increased flexibility provided through the modified language in the second draft of the London Plan; however, we believe more work is needed in this regard. In particular, the Plan introduces the word “should” into the policy language and provides a definition of what “should” means, both in the context of the plan as a whole, and again in the context of the City Design policies. We note an error in the definition of should between policy 42 and 199. We further request that reference to “Council” be removed from the definition of should. This will prevent circular visits to Council through the development approval process for the consideration of suitable alternative approaches, where such approaches should be measured against the test of good land use planning.

Cost

Overall we have significant concerns about the costs of implementing this plan, not just from a development position (capital), but from a maintenance position (operational) which results in increased costs for growth and a tax burden to ratepayers.

We believe that it is important to maintain London as an attractive and affordable place to live and work. London is not Toronto or Vancouver, it does not have the gravitational pull that these metropolitan centres do, and as a result the land economics are completely different. London cannot be engineered into being Toronto or Vancouver overnight. Significant economic development and population increases will be required to achieve that, and if taxation increases and the costs of construction skyrocket as a result of the increased costs associated with the implementation of the proposed London Plan policies, how will London achieve its goal?

There are fixed market realities at play in London that must be considered. There is a growing supply of competitively priced and generously sized building lots with well-appointed homes exploding around London’s periphery. If London doesn’t fill the market need for housing and growth, your neighbours will, and they are poised to do so.

Elements that significantly impact development yields such as the rapid transit, enhanced urban design standards as well as an exhaustive list of Guidelines and City Studies that will all create significant cost implications to running the City. These costs should be analyzed and understood before committing to these policy initiatives.

Growth

With regard to the policies for Comprehensive Review and expansions to the Urban Growth Boundary, it isn’t sufficient to simply examine the volume of the supply of designated lands on a five year basis. Provincial interest requires that you also consider the location of supply. The City itself recognized this through its Industrial Land Strategy. Location is as important as supply. The policies of the London Plan need to include provisions to ensure that the proper location and distribution of growth supply lands are provided through each OP review. In considering location, market demands and servicing viability need to be considered.

Active Mobility Network

The City needs to clarify how it proposes to implement this active mobility network. The language is inconsistent and generates confusion. Will this network be planned? what are the standards for its development?; are the components of this network to be maintained as “highways” v. “paths”? In the design of neighbourhoods, public spaces are to be incorporated to serve as mobility linkages. Do public spaces in this instance mean parkland? or will these spaces be “highways”? and how will these spaces be acquired? The mapping of these trails and pathways in the London Plan appears to be an inventory, not a plan.

The language needs to be clear and concise as to how these lands are to be acquired by the City in accordance with applicable law.

Ecological Buffers

LDI has significant concerns over the establishment of buffer widths, their application and use. If the ecological buffers are important their delineation requirements need to be spelled out in the London Plan and not relied upon in Guidelines. The City's guidelines do not contain policy.

Science should determine the ecological buffer width, not arbitrary numbers. Why does the London Plan seek to restrict from locating trails in ecological buffers when it currently promotes trails through ESA's, significant woodlands and valleylands now? Typically these ecological buffers are actively farmed prior to development, what logical and scientific rationale is there to direct pathways outside of buffers, other than the desire to increase the amount of lands buffering these features? Provincial Policy requires that its policies be read in conjunction with each other. While these policies require the protection of SIGNIFICANT natural heritage features, they do allow for development adjacent, or even within significant natural heritage features in certain circumstances. Provincial policy also requires the efficient use of lands and infrastructure and for compact urban form within serviced settlement area boundaries. Unnecessary expansion of open space lands consumes much needed development lands within the established growth boundaries, promoting unwanted sprawl and impacting the ability to maximize compact urban development on the existing infrastructure which is not consistent with the requirements of the Provincial Policy Statement ("PPS").

Consistency of Language

References to specific matters, particularly matters addressed by the PPS, are inconsistently applied through the London Plan,

Natural Heritage for example, references are made in policies to "natural features", "natural heritage features", and "significant natural heritage features". The language surrounding terms like natural features is far too prescriptive and in literal interpretation serves to sterilize lands from development. The Plan needs to be consistent in the application of terms and policies concerning these features and create greater flexibility when not addressing matters of provincial interest.

The same applies to Cultural Heritage, and Significant Cultural Heritage, historical buildings, historical resources and the interchangeable references to a Heritage Register and the Inventory of Heritage Resources. Ensure consistency in language and reduce prescriptive policy language on matters not of provincial significance.

Tree Canopy Cover

Why is the current Tree Cover believed to be inadequate and how did the City arrive at 28% as a Target? Is the inadequacy of tree cover isolated to specific locations in the City? Industrial areas perhaps or newly developing areas? What is the current percentage of tree canopy coverage? At what rate will this identified shortfall be made up? And how will growth be expected to contribute to that target?

Most concerning is what are the implications to development as the City moves to implement these targets. Parking spaces are lost to the provision of trees which result in increased land consumption for parking resulting in reduced land areas for buildings. Retroactive implementation of these targets puts at risk existing development patterns trying to address these matters. History and science has proven these trees don't survive in parking lots.

Bonus Zoning

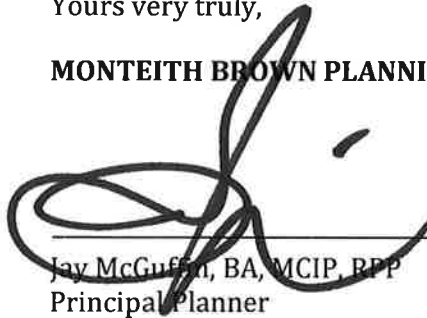
Significant confusion continues to exist around the purpose and implementation of the types of bonus zoning proposed in the Plan. Further discussion and refinement to this approach are necessary to understand the rationale for the proposed Type I and Type II bonusing.

We thank you for the opportunity to provide comments and look forward to the identified matters being addressed. We are available and would be pleased to meet to review these matters in greater detail if so desired.

We also request that MBPC be added to the circulation list and provided Notice with regard to the London Plan and all other related matters.

Yours very truly,

MONTEITH BROWN PLANNING CONSULTANTS



Jay McGuffin, BA, MCIP, RPP
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/att.

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The London Development Institute
Comments to the Second Draft of
The London Plan

(June, 2015)

October 2, 2015

Prepared by:

The logo for Monteith Brown planning consultants, featuring the lowercase letters 'mbpc' in a stylized, handwritten script font.

Monteith ♦ Brown
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Our Challenge			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
35	<i>"All of the text within this Plan will be considered part of the Official Plan and will constitute Official Plan policy. Many of these policies provide specific direction for municipal investment, public works, the evaluation of planning applications, and other actions to manage and direct physical change and the effects on the social, economic, and natural environment of the municipality. Other policies explain meaning or define goals, objectives, and intent. These policies provide valuable context that help the user to interpret the more directive policies of this Plan and help to establish their underlying meaning and purpose."</i>	Everything in the Official Plan cannot be policy, there is text provided for context and background which does not form policy of the Plan.	Please revise this policy to delete the following: " <i>(...)and will constitute Official Plan policy.(...)</i> "
42	<i>"Policies in this Plan that use the words "will" or "shall" express a mandatory course of action. Where the word "should" is used, the requirement will be considered mandatory <u>by</u> Council may consider suitable alternative approaches to meet the intent of the policy. Where the words "encourage" or "may" are used, it indicates that the City requires consideration be given to the policy, but not necessarily compliance in all instances. The term "may" can also be used to express permission or conditional permission for a specified action. The words "promote" or "support" mean that actions will be taken to advocate for and/or achieve a desired result."</i>	"by" should read "but". This policy reads differently than policy 199 in the City Design section of the Plan.	Further discussion required with City Staff/ please revise policy error.

Our Strategy			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
64	<i>"A London Plan Monitoring Program will be created to establish key performance measures and to report on our progress relating to our directions a minimum of once every two years."</i>	This short timeframe may not reflect what is happening in the marketplace where one or two buildings can meet demand for many years.	Further discussion required with City staff/ stakeholders to determine if this is a reasonable timeframe.

Our City			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
68	<i>"The London Plan recognizes the importance of thoughtfully planning for a positive pattern of growth. If London is to develop with a spread pattern of growth over the next 20 years, we will exhaust large amounts of our agricultural land, put greater pressure on the Natural Heritage System and will not take full advantage of the costly infrastructure and municipal services we have developed. We'll also be unable to deliver an affordable mass-transit system and we will have greater difficulty moving around the city as pedestrians and cyclists. Growing in this way will be very expensive – both in terms of capital costs and ongoing operating costs. A spread pattern of growth will use more energy and generate more harmful greenhouse gasses and other pollutants, costing us and our future generations significantly."</i>	This could be portrayed to be fear mongering. In the past history of development of the City over a long period of time, this is not the case (amalgamations, etc.). This statement has no purpose or meaning other than a scare tactic. The current Official Plan and the London Plan do not permit a spread pattern of growth and London has been a well-planned compact city.	Statement should be removed in its entirety.
71	<i>"Growth forecasts were prepared to the year 2035 – the 20-year planning horizon for The London Plan. These forecast, shown in Tables 1 through 5, will be monitored, extended, and revised every five years." (Tables 1-5)</i>	Background study vs. Official Plan – should this type of information be laid out in a document such as the OP?	Provide a Background Study.
73	<i>"The City Structure Plan gives a framework for London's growth and change over the next 20 years. It will inform the other policies of this Plan by illustrating the desired future shape of our city within five frameworks:</i> <ol style="list-style-type: none"> 1. The growth framework 2. The green framework 3. The mobility framework 4. The economic framework 5. The community framework."	The City Structure Plan does not include infrastructure or servicing information – too detailed to include in the OP but should be in a background study. (Where does it exist – i.e. trunk sewers, PCPs) Important to have as knowledge for the decision making process when making wholesale changes to the way the city will grow. What servicing will be required to develop the Transit Villages as proposed?	Infrastructure and Servicing Analysis should be included in the Background Study.
75	<i>"The Growth Framework establishes a plan for shaping growth over the next 20 years." (Figures 1-6)</i>	None of these figures include infrastructure or servicing information – too detailed to include? (Where does it exist – i.e. trunk sewers, PCPs) Important to have as knowledge for the decision making process when making wholesale changes to the way the city will grow. What servicing will be required to develop the Transit Villages as proposed?	Infrastructure and Servicing Analysis should be included in the Background Study.
77	<i>"During every five-year review of this Plan, the need for expansion of the Urban Growth Boundary will be evaluated through a comprehensive review to ensure there is sufficient land available, through intensification, redevelopment, and on vacant lands, to accommodate an appropriate range and mix of employment opportunities, housing, and other land uses to meet projected needs for up to 20 years."</i>	The comprehensive review is not just to ensure that there is a sufficient SUPPLY of land available; this policy needs to be consistent with Section 2 (p) of the Planning Act, being matters of Provincial Interest which also requires growth and development to be in the appropriate LOCATION.	Please revise policy to include changes in bold: <i>"(...)employment opportunities, housing, and other land uses within the appropriate locations to meet projected needs for up to 20 years."</i>
78	<i>"The Urban Growth Boundary will be expanded only if it is demonstrated through a comprehensive review that there is insufficient vacant land supply to accommodate growth needs for up to 20 years, considering this Plan's intensification target of 40%."</i>	The comprehensive review is not just to ensure that there is a sufficient SUPPLY of land available; this policy needs to be consistent with Section 2 (p) of the Planning Act, being matters of Provincial Interest which also requires growth and development to be in the appropriate LOCATION.	Please revise policy to include changes in bold: <i>"(...)will be expanded only if it is demonstrated through a comprehensive review that there is insufficient vacant land supply, or the current location of such lands is considered inappropriate to accommodate growth needs for up to 20 years, considering the Plan's intensification target of 40%."</i>
78	<i>"The Urban Growth Boundary will be expanded only if it is demonstrated through a comprehensive review that there is insufficient vacant land supply to accommodate growth needs for up to 20 years, considering this Plan's intensification target of 40%."</i>	There should be a definition regarding what the time frame is to meet this target. Is it over the 20 year life of the Plan, or should it be reviewed every five years? You will not see 40% every year.	Please revise policy to include the changes in bold: <i>"(...) considering this Plan's intensification target of 40%, over the term of the Plan."</i>
85	<i>"It is a goal of this Plan to accommodate 40% of all new residential development within the Built-area Boundary of the city, as defined by Figure 2. For the purposes of this Plan, this will be referred to as the "intensification target". The Built-area Boundary is defined generally as the line circumscribing all lands that were substantively built out as of June, 2006. This boundary will be used on an on-going basis to monitor intensification and will not change over time."</i>	Why is reference now to the year 2006 Built Area boundary? The Glossary states January 2011.	Please specify which year this policy is based upon, and revise policy and/ or Glossary accordingly and define why it has been chosen.

95	<i>“Directing infill and intensification to this area is a major part of our strategy to manage growth in the city as a whole and to achieve a target of accommodating 40% of all future residential growth in the Built – area Boundary through infill and intensification.”</i>	40% is mentioned but not explained <ul style="list-style-type: none"> - Infill and intensification - Where is this supposed to be located? - How was the 40% value determined? A better explanation and graphic of the Built Area Boundary is required and how I & I related to the BAB	Please provide more detailed information on how and why this value was determined.
104	The Mobility Framework – Figure 7 Rapid Transit	Should this not wait for the SHIFT process to be completed?	Remove until SHIFT is completed.
117	The Green Framework - Figure 11 Subwatersheds	What are they? What is the value of this map other than showing random outlined areas with no detail? These small key maps do not help to reference any of the adjoining policies.	Figure 11 should incorporate the names of the subwatersheds, either on map directly or have an appropriate numbering/legend component.
122	<i>“Our natural heritage sets the context for conservation and protection when developing our growth plans. In accordance with the policies of this Plan, <u>these lands will be protected from development</u>, enhanced, restored, and conserved for their long-term sustainability.”</i>	Should read “protected through the development process”. The Current language of this policy is almost offensive to the development community, as they play a large role in the protection and dedication of such lands.	Please revise policy with the changes in bold: <i>“Our natural heritage sets the context for conservation and protection when developing our growth plans. In accordance with the policies of this Plan, these lands will be protected through the development process, enhanced, restored, and conserved for their long-term sustainability.”</i>
139	<i>“Figure 17 shows employment lands including the majority of existing and planned industrial land in the city. These lands are primarily clustered around the Veterans Memorial Parkway and Highway 401 corridors, which are important connections to the London International Airport and the North American free trade routes. These corridors support the majority of London’s employment areas as fined by the Provincial Policy Statement. They include heavy and light industrial uses as well as a range of innovation parks and research facilities. <u>There are other employment lands throughout the city that are not specifically shown on the City Structure Plan</u>. Industrial lands can be seen on Map 1 – Place Types of this Plan.”</i>	Are they included in the supply inventory?	Please confirm that these ‘other employment lands’ are documented within the supply inventory, or specify where otherwise.
145	The Community Framework – Figure 19 Planning Districts	Lack of reference to Planning Districts – which are located where?	Figure 11 should incorporate the names of the Planning Areas, either on map directly or have an appropriate numbering/legend component.
149	City Structure Plan Composite - Figure 20	The City Structure Composite should have more detail. Why is the built area boundary not shown? Are the High Speed Rail and Trail Connections future or proposed?	Figure 20 legend should specify if the High Speed Rail and Trail Connections are “future” or “proposed” (similar to “Future Rapid Transit Corridors” label).
163	<i>“Existing trees, both public and private shall be retained to the greatest extent possible through the review of redevelopment and intensification projects.”</i>	It should be taken into consideration that not all situations may best be dealt with by the retaining of trees – i.e when a better solution is proposed to replace existing, or the health of such trees is in question. Language of policy should reflect the flexibility required.	Please revise policy with the changes in bold: <i>“Existing trees, both public and private shall be retained to the greatest extent possible through the review of redevelopment and intensification projects where possible and appropriate.”</i>
176	<i>“Planning and development applications will be approved only where there is sufficient existing or planned servicing capacity to accommodate the proposed use within a reasonable timeframe. Planning and development applications may be approved where municipal services are not in place, but where it is expected that such services will become available within a <u>three-year timeframe</u>; In such cases, a holding provision may be applied.”</i>	The policy should reflect the requirement of some flexibility when it comes to the requirement of servicing capacity available as it depends on numerous factors, when it comes to the approval of development applications. Three years should not be considered a reasonable time frame for providing future services.	Please revise policy with the changes in bold: <i>“Planning and development applications will be approved only where there is sufficient existing or planned servicing capacity to accommodate the proposed use within a flexible, reasonable timeframe. Planning and development applications may be approved where municipal services are not in place, but where it is expected that such services will become available within a five –year timeframe:(...)”.</i>

City Building Policies			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
199	<i>"Given that the design of a city can occur in many creative ways and that every site is unique, it is important that there is flexibility in the application of these City Design policies while ensuring that the overall intent of these policies is satisfied. To be clear on which policies are imperative and which have flexibility, the policies in this section use the following words purposefully: will, shall, should, encourage, may, promote and support. The words "will" or "shall" express a mandatory course of action. Where the word "should" is used, the requirement will be considered mandatory, but Council may consider suitable alternative approaches to meet the intent of the policy. Where the words "encourage" or "may" are used, it indicated that the City requires that consideration be given to the policy, but not necessarily compliance in all instances. The term "may" can also be used to express permission or conditional permission for a specified action. The words "promote" or "support" mean that actions will be taken to advocate for and/or achieve a desired result."</i>	The use of "will", "shall", and "should; do these only apply within this section as stated, or is this language to be considered throughout the entire document? This policy reads differently than policy 42 in the Our Challenge section of the Plan.	Revise to identify if this policy is for this Section only vs entire document.
Section 4.1.1. 5	<i>"All properties that are the subject of a planning and development application that are listed on the City of London Inventory of Heritage Resources shall be evaluated for heritage designation, in accordance with the Ontario Heritage Act, through the planning and development process. Neighbourhoods should be designed such that all heritage designated properties and distinctive historical elements are conserved as focal points in the neighbourhood."</i>	Who will be responsible to evaluate properties that are listed in the Inventory for heritage designation? Will this be a requirement of development approval? <i>"all [...] distinctive historical elements are conserved as focal points"</i> is a very broad subjective and prescriptive policy that fails to provide flexibility to design and development. Is the City to designate a property without owner consent? ➤ <i>Section 29 of the Heritage Act – Must submit an intent to owner and clerk, owner and public have opportunity to object</i>	Please revise policy to better specify the requirement of a heritage designation evaluation and provide flexibility with regard to what distinctive historical elements are and how such elements can be recognized and when appropriate.
Section 4.1.1.6	<i>"Existing landscapes and topographical features should be retained and integrated into new neighbourhoods."</i>	This policy is too broad and lacks context. What is an existing landscape? Does it include a development site? Can it not be graded for proper drainage and access? Can a soil deposit on the landscape not be removed? Can a bush not be removed? It should be taken into consideration that not all existing landscapes and topographical features should be retained and integrated – This policy should specify that landscapes and topographical features of significant heritage value should be retained and integrated, <u>where possible and appropriate.</u>	Please revise policy with the changes in bold: <i>"Existing landscapes and topographical features of significant heritage value should be retained and integrated into new neighbourhoods, where possible and appropriate."</i>
Section 4.1.2.6	<i>"Neighbourhoods will be designed to be connected and support active forms of transportation including cycling, walking, blading, boarding and transit. Infrastructure and amenities to support these modes of mobility will be incorporated."</i>	We are still awaiting the City's response on legal authority to require specific infrastructure and amenities for mobility and the standards for such provision?	Please provide legal authority and standards
Section 4.1.3	Edges, Focal Points, Parks and Public Facilities	Does not consider impacts of parks and gathering places next to natural heritage features with respect to unobstructed access, salts, sands, garbage.	Window streets should not be encouraged and mitigation measures need to be considered
Section 4.1.4	Streets and Streetscapes	4.1.4.1 These policies are not consistent with protection of natural heritage features; cul de sacs can help maximize land use and avoid natural features in current configuration.	Street patterns being discouraged by city can help achieve efficient design near natural heritage features
Section 4.1.4.6	<i>"Public pathways and walkways will not be considered an alternative means for establishing necessary street connections when designing new neighbourhoods, recognizing that such walkways are typically not plowed, not lit, and have poor visual exposure."</i>	The suggestion that full public rights-of-ways are required to provide for pedestrian access is contrary to good planning, does not make effective and efficient use of land or municipal tax resources, is contrary to PPS and should be removed. Barry to confirm.	Delete policy

City Building Policies			
Section 4.1.4.10	<i>"The paved portion of streets within neighbourhoods should be as narrow as possible, while meeting required design standards, to calm traffic and emphasize the pedestrian environment. Street rights-of-way should be of adequate size to accommodate all services within an efficient space and allow sufficient room for plentiful planning and growth of mature trees."</i>	"narrow as possible" – not necessarily ideal for safety, maintenance and fire and rescue purposes. What is "plentiful planning and growth of mature trees"?	Has this been reviewed by the Fire Department and EMS? Reword "plentiful planning and growth of mature trees"
Section 4.1.6.2	<i>View corridors and window streets</i>	Does not consider impacts of window streets next to natural heritage features with respect to unobstructed access, salts, sands, garbage.	Window streets should not be encouraged and mitigation measures need to be considered
Section 4.1.6.4	<i>"Retaining walls will only be permitted along street frontages where it can be demonstrated that they will offer a positive contribution to the streetscape and will be superior to matching the grade to the sidewalk from a streetscape quality perspective."</i>	This provision should not be detailed within an Official Plan – retaining walls should be dealt with and considered on a site specific basis through Site Plan or road design.	Remove policy, or rewrite policy to use the term 'may' or 'encourage' to allow for site specific flexibility.
Section 4.2	Site Layout	Passive solar vs. tree shading vs. tree cover Minimal building setbacks from streets	Conflicts as both should be on south facing side Tree planting should be encouraged at street front with sufficient space.
202, point 8	<i>"The layout and grading of a site should retain and incorporate desirable trees."</i>	It should be taken into consideration that in some circumstances it is not feasible nor the best option to retain and incorporate desirable trees; for example when an alternative replacement is more desirable, or the health of such trees is in question.	Please revise policy with the changes in bold: <i>"The layout and grading of a site should retain and incorporate desirable trees where possible and appropriate."</i>
Section 4.5.6	Parking	20-50% tree cover in parking lots does not consider the amount of space required to adequately support a tree long term; conflicts with parking needs and tree preservation and tree risk. This also causes significant issues if applied to redevelopment of sites, placing severe limitations on parking allocation or intensification of development.	City needs to define the objective of this goal. Parking lots are not a good place to gain tree canopy cover.
205, point 12	<i>"Secure, covered bicycle parking should be incorporated into multiple-unit residential, commercial, retail, institutional, and recreational developments."</i>	Why are bicycles being covered? The moment they are utilized they are exposed to the elements?	Please revise policy with the changes in bold: <i>"Secured bicycle parking should be incorporated into multiple-unit residential, commercial, retail, institutional and recreational developments."</i>

Mobility			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
217	<i>"For the purposes of this Plan, the term "street" has been used to describe what the Planning Act would refer to as a "highway" and what is often referred to as a road."</i>	What is a "path" in context of a "highway" as defined by the Planning Act? ➤ <i>Only reference in P.A is Section 51 (25) (b) that "such highways, including pedestrian pathways, bicycle pathways and public transit rights of way, be dedicated as the approval authority considers necessary;"</i>	The problem with the policy as expressed is that it will lead to misunderstandings on the part of staff and the Council: a street is a type of highway, but it is not the only type of highway anticipated by the Planning Act. This policy should be deleted, because it is technically inaccurate and misleading.
239	<i>"Neighbourhoods will be designed to incorporate public spaces that serve as mobility linkages through and between such neighbourhoods."</i>	Does 'public spaces' = parkland? How will this be acquired?	Further clarification from City staff required. This looks like an attempt to justifying parks as "highways" and squeezing out extra free land.
262	<i>"Park-and-ride facilities within the city will be sited in Transit Villages and along Rapid Transit Corridors at transit station areas. These facilities will be designed to fit within the context of the surrounding area and should, where possible, be incorporated with other structures/buildings in the area."</i>	The municipality can provide parking lots. How will lands for these facilities be provided/acquired? What standard will be used for their provision?	Explain how lands are to be acquired and at what standard of provision.

Mobility			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
263	<p><i>"A Transportation Demand Management Program will be required for all site plan applications for office uses greater than 2,000m², residential apartments and/or mixed-use buildings with greater than 100 residential units, commercial development of more than 5,000m² and institutional uses of more than 5,000m². The Transportation Demand Management Program will:</i></p> <ol style="list-style-type: none"> 1. <i>Be integrated with required transportation impact assessments submitted to support the proposed development.</i> 2. <i>Identify design and/or programmatic means to reduce single occupancy vehicle uses.</i> 3. <i>Identify the roles and responsibilities of the property owner with respect to each recommended program and its implementation.</i> 4. <i>Identify the operational and financial roles and responsibilities of the property owner including, but not limited to, program development, implementation and ongoing management and operations of the transportation demand management plan and/or program."</i> 	<p><i>It is of concern that this is to be considered a requirement for all office site plan applications within the defined guidelines – who will be responsible for such a 'program'? The term 'program' also implies that this is an <u>ongoing, updated entity</u> – if so, who is responsible for updating such a program, and for ensuring consistency? If not, the term to define such entity should be revised, i.e. Plan, Study, Report.</i></p> <p><i>Would these elements of the "Management Program" be more suitably incorporated into updated requirements of required transportation impact study/assessments for proposed development applications? Would this not ensure a better, more 'integrated' assessment of the current transportation environment, the effects of the proposed development on that environment, and the elements of the proposed development that will help to tackle the requirements listed (and the list of strategies within the current OP 18.2.10)?</i></p>	<p>Further discussion with City staff required.</p>
265	<p><i>"The active mobility network is shown on Figure 22 of this Plan. This planned network will be considered in the evaluation of all planning and development applications."; also see Figure 22.</i></p>	<p>➤ Figure 22 does not appear to be a 'planned network' as stated. What is planned, proposed, and what is existing?</p>	<p>Please revise policy and/ or Figure 22 to clarify what is existing, planned and proposed.</p>
272	<p><i>"Cycling routes and pedestrian pathways will provide linkages between open space areas, neighbourhoods, centres, corridors, employment areas and the public transit services and will enhance the convenience, safety and enjoyment of walking and cycling."</i></p>	<p>How are these linkages being planned? To what standards? And how are they being acquired?</p>	<p>Where pedestrian and cycling linkages or connections are required for transportation purposes, they need to be shown on the transportation schedule to this official Plan. This will help avoid confusion between the paths that are for recreational and interpretive purposes and those which are required for transportation purpose. Pedestrian and cycling facilities which constitute transportation linkages will be identified as highways on registered plans of subdivision. These linkages will be assumed and maintained by the city as highways (during all weather conditions) to permit them to accomplish their intended transportation function. Bike and pedestrian thoroughfares ("highways") may, if feasible and consistent with the open space policies of this plan, be accommodated with the open space designation. Other linkages will be primarily for recreational purposes and maintained at the city's discretion."</p>
274	<p><i>"A winter maintenance program will be prepared to ensure safe access and usage of the active mobility network."</i></p>	<p>Barry to review. Mobility network vs. pathways ("highways")</p>	<p>What is the Active Mobility network? All pathways and trails or just certain ones? Will these be planned and mapped on the transportation schedule?</p>
296	<p><i>"Through the planning process relating to plans of subdivision and consent, conditions may be established to require that streets, including pedestrian pathways, cycling pathways, and public transit rights-of-way, be dedicated as the approval authority considers necessary. Figure 22, the Active Mobility Network, may be consulted through the planning and development application process to assess such requirements."</i></p>	<p>What is the City legal opinion regarding the dedication of lands, at what rate, and under what authority? Language needs to be consistent with the Planning Act</p>	<p>The policy as written misconceives the power given to municipalities to require such things. Not all pathways will qualify and the City needs to be clear about the boundaries.</p>

Mobility			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
298	<i>"As a condition to the approval of site plans, the municipality may require lands to be dedicated to the municipality at no expense for the widening of streets that abut the land and/or lands for a public transit right-of-way."</i>	In previous Official Plan, portion of road widening to be dedicated was able to be included in overall density calculations for developments as an agreement for providing such lands – is this still the case with this OP?	This policy needs to refer to the requirements as they apply in the Planning Act as the Official Plan doesn't offer the power to do this. The land area dedicated for road widening should be allowed to be used in calculating the density for the adjacent land to meet the density targets of the London Plan.
301	<i>"Park and ride facilities may be established at the Transit Villages to allow for regional traffic to easily connect to the Downtown and high speed rail services."</i>	'Regional traffic' – who is going to build and pay for these?	Further discussion with City staff required.

Forest City			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
317	<i>"It is a target of this Plan to achieve a tree canopy cover of 28% within the Urban Growth Boundary by 2035."</i>	What is the planning policy basis for this? What is the current percentage of tree canopy cover within the Urban Growth Boundary? The picture of now vs. target would be clearer with this information provided within the policy. How is the City going to address these deficiencies? Does the City commit to making up the shortfall? How will growth be expected to accomplish the goals on lands specifically identified for growth?	Please clarify within policy what the current tree canopy cover % is and how these targets will be achieved and what level of commitment the City is going to make to achieve that target?
319	<i>"Specific tree canopy cover and other targets for specific place types will be developed through the Urban Forest Strategy Implementation Plan, the Zoning By-law, and other by-laws and guideline documents."</i>	How is it possible that the Zoning By-law can be used as a tool to control this? The Zoning By-law is used on a site specific basis – not intended or able to incorporate 'targets'.	Please remove the reference to the "Zoning By-Law" within the policy.
320, point 1	<i>"A tree canopy cover analysis will be prepared every five years to determine if tree canopy targets are being achieved."</i>	Why is this analysis required, and how was the 5 year timeline determined?	Further discussion with City staff required.
320, point 3	<i>"An inventory update and analysis of trees in boulevards, rural streets, manicured portions of parks and municipal properties, will be completed at least once every ten years."</i>	Why is this analysis required, and how was the 10 year timeline determined?	Further discussion with City staff required.
323, point 2b	<i>"Except where otherwise specified in City by-laws, trees shall be replaced on the same site, at a ratio of one replacement tree for every ten centimeters of tree diameter"</i>	Development already results in a street tree for every lot created. Why is this needed additional replacement needed for privately held trees when municipal trees are not afforded the same protection?	Further discussion with City staff required
323, point 4	<i>"With respect to individual municipal trees that are removed from a street right-of-way, park or other City property, compensation or mitigation shall be as per the conditions of the appropriate municipal by-law pertaining to the municipal trees. However, this policy will not apply to tree removals connected with City maintenance operations, or a street, municipal infrastructure, or park development project."</i>	What will apply? ➤ What scenarios <u>would</u> allow for this policy to be applied? Relatively loose language when it comes to qualifying the removal of municipal trees to be under either 'maintenance operations' or 'development projects', especially when it is to be determined by the City.	Further discussion with City staff required.
323, point 7	<i>A tree conservation bylaw for private property will be established to prohibit the destruction of trees</i>	This is a bylaw issue and text is too prescriptive until bylaw is finalized and passed	Remove this text
323 point 8	<i>A municipal tree protection bylaw will be established</i>	Far less prescriptive than privately held trees discussed in point 7	Municipal standards are less onerous than for private lands. This needs more discussion with City
323 point 10	<i>Water Balance study may be required</i>	This is covered under the Natural heritage section. Is this section meant to discuss open grown or hedgerow trees?	Remove this point
324, point 11	<i>"Medians and boulevards will be designed with barriers, buffers, irrigation, drainage, or other appropriate systems where tree planting is specified and heavy salt loads are anticipated, to protect trees and support their long-term healthy growth and development."</i>	Irrigating boulevards? ➤ Is the City to be responsible for the initial cost and maintenance of 'irrigation' of medians and boulevards once assumed?	Further discussion with City staff required.

Parks and Recreation				
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions	Noted By
333, point 6	<i>"Where applicable, in accordance with the Planning Act, pedestrian and cycling pathways will be dedicated to the City at no charge through applicable planning and development processes."</i>	The legislation anticipates the dedication of highways. This policy should be deleted because it is an invitation to misunderstanding at both the Council and staff levels.	Delete policy	JMc
343	<i>"Open Spaces may include natural features and are often linear in nature following tributaries of the Thames River, upland corridors, or utility easements. Open Spaces typically include multi-use pathways systems that link neighbourhoods to surrounding parks and community amenities such as schools, business areas, shopping areas and transit corridors and villages, greatly improving active transportation and active living opportunities. Through development approval processes, all or portions of Open Spaces that are acquired for their mobility role are dedicated above the normal parkland requirements as per the Planning Act"</i>	The present wording demonstrates the problem: this suggests that if staff say there is a link, then there is a link. The link is automatically a highway. No study, no specifications. The policy is misconceived and should be deleted.	Delete the policy	JMc
346	<p><i>"In addition to the City Design policies of this Plan, key considerations for the design of City parks and recreational amenities include:</i></p> <ol style="list-style-type: none"> <i>1. Where parks and public spaces are adjacent to urban uses, such as houses, commercial uses, or prominent buildings or facilities, buildings should be designed to provide an active frontage onto these spaces to create a positive interaction with the space. <u>Rear-lot development onto parks shall be discouraged.</u></i> <i>2. Parks and open spaces will be designed to be safe and open to casual public surveillance. Parks will have wide exposure to streets and front-facing development. Parks will be designed to avoid the placement of high berms and other features that impair visual access through a park from the street.</i> <i>3. Narrow pathways will not be relied upon to provide connectivity and main access points to park spaces. Rather, street layouts will be designed to allow for easy, safe, and attractive pedestrian access from all parts of a neighbourhood to each park space.</i> <i>4. Parks and public spaces will be designed to accommodate the City of London Facility Accessibility Design Standards and to adhere to the Accessibility for Ontarians with Disabilities Act.</i> <i>5. Parking facilities will be designed to minimize their impact on the character of the public space. Wherever possible, on-street parking will be used to accommodate a public space's parking requirements.</i> <i>6. Detailed design standards and specifications shall be developed and/or updated to provide direction and consistency within the subdivision development process."</i> 	<p><i>"Rear lot development onto parks shall be discouraged"</i></p> <p>When parkland has more than one street frontage, it becomes an economic loss for developers, and also provides less future taxes for the City. This design is also not necessarily more positive, safe, or the best use of land. This is stemming away from the 'eyes on the park' mentality, which is safer, more beneficial for the community. Older neighbourhoods tend to have fantastic park and parkette spaces which do not typically have more than one or two street frontages.</p>	Remove section of policy.	JK

Civic Infrastructure			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
391	<i>"Planning and development proposals that will not have access to the necessary civic infrastructure <u>within a three year period</u> will be considered premature. The acceleration of infrastructure through a municipal servicing and financing agreement may be considered in accordance with the Our Tools policies of this Plan. Such agreements may merit the consideration of proposals that would otherwise be as much as five years away from necessary access to servicing."</i>	Three year time period is not a very reasonable timeline when taking into consideration the actual planning and engineering approval processes and how long they actually take.	Revise timeline to a five year period.

Food System			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
636	<i>"Protect and preserve the city's farmlands and agricultural-related industries as part of a sustainable food system."</i>	The London Plan speaks to the city recognizing our place in the regional context and by protecting our own farmland, we are encouraging development and growth to locate in the surrounding municipalities taking more farmland from our neighbours.	Further discussion/ clarification with city staff required.

Green and Healthy City			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
674	<i>"Wherever possible, new developments will be planned to be "future ready" to accommodate the future use of solar energy, electric vehicles, and (where applicable) district energy systems. <u>Standards may be developed to require that neighbourhoods or individual buildings are developed to meet specific sustainability measures and standards.</u>"</i>	In regards to " <u>Standards may be developed to require (...)</u> ", who would be required to create and uphold such standards? Will this take form in a new Study or Plan for the city to bring into fruition?	Further discussion/ clarification with City staff required.

Place Type Policies			
City-wide Place Types – Green Space			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
711	<i>"Linkages will be provided between green space areas, where possible, as a means of encouraging continuity and accessibility to and between green space areas and for providing habitat for the easy movement of animals within our city. Examples of such linkages include utility corridors, abandoned railway lines, or physical features such as valleylands. Naturalization may occur to establish new linkages, or widened linkages, within the green space network. Linkages that support the Natural Heritage System are identified as potential naturalization areas and potential upland corridors on Map 4 of this Plan."</i>	The language of 'where possible' declines to assume that potential private land owners have any say in regard to the creation of green space linkages on private lands. Change wording from "where possible" to "where appropriate", which will imply that on a case by case basis, all parties will be involved in the decision making process.	Please revise policy with changes in bold: <i>"Linkages will be provided between green space areas, where appropriate, as a means of encouraging continuity and accessibility to and between green space areas and for providing habitat for the easy movement of animals within our city. Examples of such linkages include utility corridors, abandoned railway lines, or physical features such as valleylands. Naturalization may occur to establish new linkages, or widened linkages, within the green space network. Linkages that support the Natural Heritage System are identified as potential naturalization areas and potential upland corridors on Map 4 of this Plan."</i>
718	<i>"To prevent or mitigate potential impacts due to site alteration and tree cutting in lands identified as Green Space or Environmental Review, or within any other Place Type shown on Map 1 that may contain landscapes or trees that are <u>deemed worthy of protection</u>, Council may adopt appropriate by-laws to prohibit or regulate the placing, dumping, removal or regrading of topsoil or fill, and any <u>human-made disturbance of soil</u>, destruction, removal or injuring of trees."</i>	"Deemed worthy of protection" – by who and how? "human-made disturbance of soil" – farming?	Further clarification from City staff required.

City-wide Place Types – Environmental Review			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
721	<i>“In some cases, lands may contain natural heritage features and areas that <u>have not been adequately assessed to determine whether they are significant and worthy of protection</u> as part of the City’s Natural Heritage System. The Environmental Review Place Type will ensure that development which may negatively impact the value of these features does not occur until such time as the required environmental studies are completed.”</i>	<i>“Have not been adequately assessed to determine whether they are significant and worthy of protection”</i> - Lands outside of UGB - Should be based on ground based science, not table top.	Further discussion/ clarification with City staff required.
722	<i>“In addition to the components of the Natural Heritage System which have been evaluated and shown as Green Space on Map 1 – Place Types, in accordance with the policies of this Plan, additional lands are identified on Map 4 – Natural Heritage, that may contain significant natural features and areas and important ecological functions which should be protected until environmental studies have been completed, reviewed, and accepted by the City. These potential components of the Natural Heritage System, shown within the Environmental Review Place Type on Map 1, will be protected from activities that would diminish their functions pending the completion, review and acceptance of a detailed environmental study.”</i>	Should be based on ground base science, not table top.	Further discussion/ clarification with City staff required.
724	<i>“Environmental Review Place Type lands, or portions thereof, that are determined to satisfy the criteria for significance in accordance with the Natural Heritage policies of this Plan will be included in the Green Space Place Type on Map 1. Other Environmental Review Place Type lands, or portions thereof, which do not satisfy the criteria for significance in accordance with the provisions of the Natural Heritage policies will be included within another appropriate place type, in conformity with the policies of this Plan.”</i>	➤ This guiding principal is good – guidelines and City practices do not follow this guidance of refinement of final Natural heritage feature.	Flexibility needed in text of Natural Heritage policies to accomplish.
725	<i>“In addition to the components of the Natural Heritage System which are within the Green Space Place Type on Map 1, <u>other natural heritage features</u> and areas are identified in the subwatershed studies or in other environmental studies that have been reviewed and accepted by the City. These features and areas may be included within the Environmental Review Place Type and may be identified on Map 4 as one of the following: 1. Unevaluated Vegetation Patches 2. Unevaluated Wetlands 3. Unevaluated Valleylands Potential ESA’s.”</i>	What “other natural heritage features”? Topography?	These other natural heritage features be either identified on the official plan or tested in some appropriate manner before they are identified in the official plan.
729	<i>4. “The City will undertake an environmental study of all lands within the Environmental Review place Type outside of the Urban Growth Boundary. Lands determined not to be significant in accordance with the Natural Heritage Policies of this Plan will be included within the Farmland Place Type.”</i>	Is this study subject to the same type of scrutiny as a study under paragraph 728? The OMB decision from SWAP determined that a desktop analysis was insufficient.	Further clarification from City staff required.
730	<i>“To mitigate potential impacts <u>due to site alteration and tree cutting</u> on lands shown as Environmental Review on Map 1, Council may adopt appropriate by-laws to prohibit or regulate the placing, dumping, removal, or regrading of topsoil or fill, and the destruction or injuring of trees.”</i>	Is this in regard to lands with a planning application? Can farms alter lands for grading?	Further clarification from City staff required.

Urban Place Types - Downtown			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
747	<i>“As shown on Map 1 – Place Types, for the purposes of this Plan, the Downtown is defined as the area bounded by: • Colborne Street to the east</i>	The inclusion of an additional Figure to accompany the Downtown boundary would help make this Section easier to follow, instead of having to refer back to the Map appendices.	Please revise to include inset map with Downtown boundary as reference.

Urban Place Types - Downtown			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
	<ul style="list-style-type: none"> The CN railway tracks to the south The Thames River to the west <p>Kent Street from the Thames River to Richmond Street; Richmond Street from Kent Street to Angel Street; Angel Street from Richmond Street to Clarence Street; Clarence Street from Angel Street to Central Avenue; Central Avenue from Richmond Street to Wellington Street; Wellington Street from Central Avenue to Princess Avenue; Princess Avenue from Wellington Street to Waterloo Street; Waterloo Street from Princess Avenue to the mid-block between Queens Avenue and Dundas Street; and mid-block between Queens Avenue and Dundas Street to Colborne Street, to the north.”</p>		

Urban Place Types – Transit Village			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
Between 756 & 757	Imagery	Imagery on these pages clearly shows an American light rail photo with high rise development in the background.	Remove American imagery to suggest local context.

Urban Place Types – Rapid Transit and Urban Corridors			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
781, point 10	<p>“Planning and development applications will not be supported if they result in the creation of one or more isolated remnant lots that cannot be reasonably developed or assembled with other parcels in the Place Type to develop in accordance with the long-term vision for the Corridor.”</p>	The city should be very careful in the wording of this policy so as not to discourage development and gentrification. Flexibility should be added to this policy. If not, planning applications should not be automatically unsupported because of this.	Further discussion/ clarification with City staff required.
799.1	<p>“To allow for the future redevelopment of large commercial blocks, a grid of driveways that extend through the site, spaced appropriately across the width of the property, will be established through the site plan process. These drive aisles will be designed to include sidewalks and trees. The purpose of establishing this organizational structure on these sites is to:</p> <ol style="list-style-type: none"> Provide a form of large-lot development that can redeveloped more easily in phases at a future date. Allow the opportunity for redevelopment of the rear portion of commercial blocks in the future, ensuring that these connecting streets or driveways are not obstructed from these rear-lot areas by buildings Allow for better connections through the site for pedestrians, transit users, and cyclists <p>Allow the possibility for future neighbourhood connections that could connect transit services, the corridor and the commercial block to the neighbourhood.”</p>	<p>Should state “where appropriate”</p> <ul style="list-style-type: none"> Not every site is going to be able to be developed like this Hyde park development vs. Wonderland and Southdale development <p>Compartmentalized commercial lands (forced to use car) vs. strip style (more walkable between shops)</p>	<p>Please revise policy with the changes in bold:</p> <p>“To allow for the future redevelopment of large commercial blocks, a grid of driveways that extend through the site, spaced appropriately across the width of the property, will be established through the site plan process where appropriate. These drive aisles will be designed to include sidewalks and trees. The purpose of establishing this organizational structure on these sites is to:</p> <ol style="list-style-type: none"> Provide a form of large-lot development that can redeveloped more easily in phases at a future date. Allow the opportunity for redevelopment of the rear portion of commercial blocks in the future, ensuring that these connecting streets or driveways are not obstructed from these rear-lot areas by buildings Allow for better connections through the site for pedestrians, transit users, and cyclists <p>Allow the possibility for future neighbourhood connections that could connect transit services, the corridor and the commercial block to the neighbourhood.”</p>

Urban Place Types – Shopping Area			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
819, point 3	<p><i>"The following form policies apply within the Shopping Area Place Type: (...)</i></p> <p>3. <i>To allow for the future redevelopment of large commercial blocks, a grid of driveways that extend through the site, spaced appropriately across the width of the property, will be established through the site plan process. These driving aisles will be designed to include sidewalks and trees. The purpose of establishing this organizational structure is to: (...)"</i></p>	The term 'established' should be considered too concrete for such a policy like this. Depending upon the location, type of commercial use and other factors, certain design elements will vary from site to site.	Please revise policy with the changes in bold: <i>"(...)To allow for the future redevelopment of large commercial blocks, a grid of driveways that extend through the site, spaced appropriately across the width of the property, will be promoted where appropriate through the site plan process.(...)"</i>

Urban Place Types – Main Street			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
839, point 3	<i>"Office uses will not exceed 2,000m²."</i>	Is this maximum size on a per building or aggregate basis?	Please revise policy to be more specific to address comment.

Neighbourhoods			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
849, point 4a, 4b	<p><i>"Tables 12 to 14 give important guidance to the permitted uses, intensity, and form of development that may be permitted on lands within the Neighbourhood Place Type. The following policies provide direction for the interpretation of these tables: (...)</i></p> <p>4. <i>Where development is being considered at the intersection of two streets of different classifications:</i></p> <p>a) <i>The street onto which the property has frontage, as described above, will be used to establish the permitted uses and intensity of development on Tables 12 and 14.</i></p> <p>b) <i>The development will be oriented towards the higher-order street. (...)"</i></p>	In comparison to point 4a – the development itself will be oriented to the higher order street, but the permitted use will be oriented dependant on which street is considered to have the frontage?	Further discussion/ clarification with City staff required.
863	<i>Table 14 – Retail, Service and Office Floor Area Permitted in Neighbourhood Place Type</i>	How is the 200m ² for the maximum floor area that may be permitted conditional upon classification of intersecting street for Neighbourhood Street and Neighbourhood Connector distributed along the corridor?	Further discussion/ clarification with City staff required.
869, point 13	<i>"A secondary dwelling unit shall be permitted only where the primary unit is owner occupied."</i>	Is this legal? Where does the Planning Act allow for use only by ownership?	Barry to review
874	<i>"Residential intensification proposals will require site plan approval/ Only those secondary dwelling units that will be housed within new or expanded accessory structures will require site plan approval."</i>	Costly and doesn't promote intensification; why does the addition of a secondary unit with no external modifications require site plan approval?	Further discussion/ clarification with City staff required.
878	<i>"The standard site plan approval process shall apply to intensification projects that will result in three or more residential units. However, for intensification proposals that will result in less than three residential units, and for secondary dwelling units in accessory structures that are subject to site plan approval, the following policies allowing for a scoped site plan approval process shall apply unless issues are identified that would warrant the use of the normal site plan approval process:</i>	What if there is no external modification? Site plan requirements for small scale residential infill and intensification projects are restrictive and counter to the Provincial direction to promote opportunities for infill and intensification.	Please revise policy with changes in bold: <i>"(...) The full range of submissions required for the standard site plan approval process will not be required. Rather, the following submissions may be required:</i>
			<p>a. Where appropriate, an urban design brief.</p> <p>b. Where appropriate, Site plan and building elevation drawings (...)"</p>

Neighbourhoods			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
	<p>1. The full range of submissions required for the standard site plan approval process will not be required. Rather, the following submissions will be required:</p> <ol style="list-style-type: none"> An urban design brief, scoped to address relevant design issues. Site plan and building elevation drawings. Where appropriate, a grading certificate and a water service and sewer/drainage connections plan. <p>2. Upon review and approval, the site plan and building elevation drawings will be stamped as approved and constitute applicable law. No development agreement or security will be required unless there is a specific reason for such requirement."</p>		
882	<p>"Not all High Density Residential designations have been carried over as remnant designations on Map 2 of this Plan. Those High Density Residential designations that have not been carried over include:</p> <ol style="list-style-type: none"> Lands that are located within a place type in the London Plan that allows for higher-intensity residential buildings. Lands that have been developed for residential buildings of six storeys or less and are best reflected by the Neighbourhood Place Type." 	If they're carried over – do they have the same 'rights' re: height as outlined in 89 Official Plan?	Further discussion with City staff required.
884	<p>"Development within the Remnant High Density Residential Designation will be monitored and this overlay <u>will be evaluated every five years</u>. Over the long term, this overlay may be removed from the Plan such that only the underlying place type policies will apply."</p>	Every five years- is this enough of a timeline to have something be completed, evaluated and then updated?	Further discussion with City staff required.
891, point 9	<p>"Near-Campus Neighbourhoods will(...)</p> <p>9. Cherish, conserve, and protect heritage resources."</p>	This policy should further define the heritage resources as "significant", and also "where possible and appropriate", as this ensures that there is the flexibility for further analysis on a case by case basis of this policy. Loose language creates a blanket policy which may not always create the ideal results.	Please revise policy with changes in bold: "Cherish, conserve, and protect significant heritage resources where possible and appropriate ."
892, point 11	<p>"All planning and development applications will be reviewed to evaluate the degree to which they meet these goals: (...)</p> <p>11. Conserve heritage resources which contribute to the identity of streetscapes and neighbourhoods."</p>	<p>What is considered to be a 'heritage resource'? Are such resources listed?</p> <p>The addition of "where appropriate".</p>	Please revise policy with changes in bold: "All planning and development applications will be reviewed to evaluate the degree to which they meet these goals: (...) 11. Conserve significant heritage resources which contribute to the identity of streetscapes and neighbourhoods, where appropriate ."
901, point 7	<p>"Within the Near-Campus neighbourhoods in the interior of the Neighbourhood Place Type, defined as those areas fronting neighbourhood streets or neighbourhood connectors, planning applications to allow for residential intensification and residential intensity will be supported only if all of the following criteria are met: (...)</p> <p>7. Significant heritage resources are protected and conserved where appropriate and necessary according to the Cultural Heritage policies of this Plan."</p>	In comparison to previous policy noted – 892.11, what is to be considered the difference between a 'heritage resource' and a 'significant heritage resource'?	Please revise policy and/ or consider the addition of a definition to define how the addition of the word 'significant' changes the implications of this and similar policies within the Plan. The criteria should be used as such, so that intensification applications are evaluated on the basis of the following criteria. The "supported-only" concept does not belong in the official plan.
905	<p>"The heritage building stock within Near-Campus Neighbourhoods is a significant asset to these neighbourhoods, the adjacent educational institutions, and the City of London. It is a goal of these policies to conserve this heritage building stock wherever possible through rehabilitation and conservation."</p>	The addition of "and appropriate" after "wherever possible"	Please revise policy with changes in bold: "The heritage building stock within Near-Campus Neighbourhoods is a significant asset to these neighbourhoods, the adjacent educational institutions, and the City of London. It is a goal of these policies to conserve this heritage building stock wherever

Neighbourhoods			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
			possible and appropriate through rehabilitation and conservation”
906	“The heritage building stock includes properties listed in the City of London Inventory of Heritage Resources as well as those properties designated under Part IV or Part V of the Ontario Heritage Act.”	Is that all that is currently within the complete heritage building stock? The word ‘includes’ implies that there may be other elements in it. It may be worth considering changing ‘includes’ with ‘consists of’.	Please revise policy with changes in bold: “The heritage building stock consists of properties listed in the City of London Inventory of Heritage Resources as well as those properties designated under Part IV or Part V of the Ontario Heritage Act.”

Rural Place Types - Farmland			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
1146, point 2	“Hedgerows and woodlands are to be maintained and, where possible, enhanced to bolster the image of the Forest City, enhance their environmental features and areas and their ecological functions, and connect to the city’s Natural Heritage System.”	Are these hedgerows to be considered ‘significant natural heritage’? Current language may not allow for the removal or relocation of such features for example due to the health of such feature, or human error with location, scale, etc.	Please revise policy with changes in bold: “Hedgerows and woodlands are to be maintained where appropriate and, where possible, enhanced to bolster the image of the Forest City, enhance their environmental features and areas and their ecological functions, and connect to the city’s Natural Heritage System.”

Environmental – Natural Heritage			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
1239	“Watershed report cards produced by the local conservation authorities provide a base level of monitoring for various ecological functions, from water quality to forest cover in each watershed. This information extends beyond London’s boundaries. The City also carries out detailed water quality monitoring on the Thames River and many of its tributaries. Further effort is required to expand and enhance this monitoring to demonstrate the success of the City’s many environmental mitigation and management programs.”	No justification for expansion of monitoring that exists today. Enhanced monitoring to be beneficial and efficient. Is appropriate	Remove “expand” and re-word to suggest the monitoring program should be reviewed and improved to be beneficial and efficient If the purpose is to commit to monitoring, the policy should say that: here is what we need to monitor, here is why we need to do it and this is how the information will be used. That would be a policy.
1241	“Components of the Natural Heritage System that are identified or delineated on Map 4 but not within the Green Space or Environmental Review Place Types on Map 1, will be evaluated to further assess their significance and determine the need for protection under the policies of this Plan. Where appropriate, these features and functions may be protected in whole or in part through measures such as, but not limited to, Open Space zoning, tree preservation plans associated with subdivision or site plan applications, public land acquisition, site alteration and tree conservation by-laws, conservation easements, and private stewardship initiatives”	Map 4 components are not on Map 1 - What features are these? All features on Map 4 should be on Map 1 or they should not be on Map 4. Not all components are a part of Open Space - Agree, but guidelines currently do not permit protection of parts of features. Critical habitat zone text needs to be introduced.	Fix mapping. Fix guidelines or clarify this policy by referring to Boundary delineation guidelines and Critical Habitat zones If they know about such features they should map them, instead of pretending that they have intentionally excluded these features. It would be more honest to say that if unmapped resources are discovered, an applicant may be required to conduct an EIS.
1241	“Components of the Natural Heritage System that are identified or delineated on Map 4 but not within the Green Space or Environmental Review Place Types on Map 1, will be evaluated to further assess their significance and determine the need for protection under the policies of this Plan. Where appropriate, these features and functions may be protected in whole or in part through measures such as, but not limited to, Open Space zoning, tree preservation plans associated with subdivision or site plan	“Not within the Green Space or Environmental Review place Types on Map 1, will be evaluated” - 0.5 ha lands	Further discussion with City staff required.

Environmental – Natural Heritage			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
	<i>applications, public land acquisition, site alteration and tree conservation by-laws, conservation easements, and private stewardship initiatives”</i>		
1243, point 14	<p><i>“Natural heritage areas and other areas included in the Green Space Place Type include: (...)”</i></p> <p><i>14. Council may require or encourage the retention of natural features or functions other than the features listed above, through the secondary planning, subdivision approval, official plan and/or zoning by-law amendment, consent, variance and site plan approval processes.”</i></p>	<p>Intro should read “<i>may include</i>”.</p> <p><i>“Council may require or encourage the retention of natural features(...)”</i> – what filters will be used? 0.5 ha</p> <p>Natural features are not mapped – Council may require retention of feature not identified or part of the Official Plan</p> <p>“Other features” which are not identified have no no evaluation process or natural heritage target listed to properly assess whether or not the feature is important,</p>	<p>Please revise policy with the changes in bold: <i>“Natural heritage areas and other areas included in the Green Space Place Type may include: (...)”</i></p> <p>No mechanism identified for Council to do this.</p> <p>Strike this from the OP. The OP should guide landowners and not present surprises later for sites that are already designated and zoned for the use (not working now; lots of conflict)</p> <p>Further discussion with City staff required.</p>
1244	<i>“The policies in this chapter apply to recognized and potential or unevaluated components of the Natural Heritage System as identified or delineated on Map 4, or features that may be considered for inclusion on Map 4. Not all components of the Natural Heritage System are necessarily mapped on Map 4. In the review of any planning application, an initial review of the lands shall be undertaken to confirm the presence or absence of any natural features that may be present that have not been mapped to determine if further evaluation of the feature is required.”</i>	Potential or unevaluated components that are not mapped – This suggests there are features that have not yet been mapped despite a host of studies leading up to the OP. If they are not mapped, then we need a reasoned approach to evaluate these with the focus on whether or not inclusion is warranted, particularly in areas that have been designated and/or zoned for use.	Strike this from the OP or clarify this is targeted to lands which are currently not designated for specific uses.
1245	<i>“The following policies address the criteria used to identify and evaluate natural heritage areas for their significance, and may be complemented by Environmental Management Guidelines adopted by Council. All significant components of the Natural Heritage System identified or delineated for protection are within the Green Space Place Type on Map 1. Certain components of the Natural Heritage System will be identified and evaluated in accordance with provincial requirements. These policies also address the protection of environmental quality and ecological function with respect to water quality, water quantity, groundwater recharge areas, headwater streams and highly vulnerable aquifers when read in conjunction with the Natural Resource policies of this Plan.”</i>	Environmental Management Guidelines – designed for large woodlands (>4 ha) now expanded to vegetation patches and now expected to evaluate small features not mapped.	Fix to not require EMS guidelines to evaluate features not mapped that are ecologically far too small. This policy needs to be rewritten
1248	<i>“Certain lands adjacent to these recognized environmentally significant areas may have potential for inclusion in the environmentally significant area if warranted on the basis of site-specific evaluation, including the application of the Boundary Delineation Guidelines that shall be undertaken in conjunction with secondary plans, subject lands status reports, or environmental impact studies associated with development applications.”</i>	If a site is ESA, then the boundaries have been mapped and confirmed and this policy is redundant – does this mean buffers?	Delete policy
1250, point 1	<p><i>“Candidate areas that clearly satisfy two or more of the following criteria will be considered for recognition as environmentally significant areas:(...)”</i></p> <p><i>1. The area contains unusual landforms and/or rare or uncommon natural communities within the county, province or London subwatershed region.”</i></p>	<p>Define unusual landforms?</p> <p>Define and/or rare to uncommon natural communities?</p> <p>Give examples in London outside of the Thames River Corridor or existing OS lands.</p>	<p>A table to quantify the guideline filter is needed.</p> <p>Further discussion/ clarification with City Staff required.</p>

Environmental – Natural Heritage			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
		Some of these require quantification i.e. rare to uncommon in London. References an analysis but none area available.	
1250, point 2	<i>“The area contains high-quality natural landform-vegetation communities that are representative of typical pre-settlement conditions of the dominant physiographic units within the London subwatershed region, and/or that have been classified as distinctive in the Province of Ontario.”</i>	What are “high-quality landform vegetation communities”.	Further clarification with City Staff required.
1252	<i>“Development and site alteration shall not be permitted in provincially significant wetlands as identified on Map 4 or determined through environmental studies in accordance with policies of the Provincial Policy Statement and this Plan. Wetlands evaluated using the Ontario Wetland Evaluation System are classified on the basis of scores determined through the evaluation. Wetlands meeting the criteria set forth by the Ministry of Natural Resources and Forestry shall be confirmed by the Ministry of Natural Resources and Forestry, and shall be mapped as provincially significant wetlands on Map 4 and included in the Green Space Place Type on Map 1. Wetlands can be identified using Ecological Land Classification. Where a wetland is identified through Ecological Land Classification, the significance of the wetland must be evaluated using the Ontario Wetland Evaluation System. For wetlands that are evaluated using the Ontario Wetland Evaluation System and confirmed by the Ministry of Natural Resources and Forestry to be not significant, the City of London may identify the wetland on Map 4 as locally significant wetland and include it in the Green Space Place Type on Map 1.”</i>	All wetlands should be mapped as one entity (i.e. not PSW or local), then this allows for re-evaluations, boundary changes etc. and also flags to check MNR status at the time. Otherwise, MNR layers are often inaccurate (typically desktop) and yet places areas automatically as OS.	Fix
Section 5.5	Significant Woodlands and Woodlands	Should be two separate policies for clarity.	Separate into two separate policies for clarity.
1266, points 1,2,4,5	<i>“The significance of woodlands will be based on an evaluation of the following considerations: (...)</i> <i>1. The woodland contains natural features and ecological functions that are important to the environmental quality and integrity of the Natural Heritage System. These include site protection (hydrology and erosion/slope) and landscape integrity (richness, connectivity and distribution).</i> <i>2. The woodland provides important ecological functions and has an age, size, site quality, diversity of biological communities and associated species that is uncommon for the planning area. (...)</i> <i>4. The woodland provides significant habitat for species at risk.</i> <i>5. The woodland contains distinctive, unusual or high quality natural communities or landforms.”</i>	Woodland significance – OP filters 1,2,4,5 are reasonable, but the EMS filters do not reflect this objective, i.e. a woodland that is 40 years old is not rare for London but scores high.	Fix
1266, point 3	<i>“The significance of woodlands will be based on an evaluation of the following considerations: (...)</i> <i>3. The woodland is important for the provision of a balanced distribution of open space amenities and passive recreational opportunities across the urban area.”</i>	This should be considered a Parks policy, given its reference to open space amenities and passive recreational opportunities; not of natural heritage significance.	Remove point 3 in its entirety from policy.
1268	<i>“Woodlands that are not determined to be ecologically significant but are to be retained for public open space or park purposes according to criterion No. 3 above , or woodlands to be retained at the property</i>	Woodlands not significant – any trees outside of the NHS need compensation; no justification for natural heritage.	Remove.

Environmental – Natural Heritage			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
	<i>owner's request as a private woodland, will be included in the Green Space Place Type on Map 1 and identified as woodlands on Map 4. If a woodland is evaluated and confirmed as not being ecologically significant, and the property owner or the city have no interest in their retention, the lands may be changed from the Environmental Review Place Type to another place type in accordance with the policies of this Plan, and the woodlands or unevaluated vegetation patch identified on Map 4 may be removed. Any trees removed outside of the Natural Heritage System will be compensated for in accordance with the Forest City policies of this Plan."</i>		
1270	<i>"Significant valleylands provide a number of important natural heritage values and ecological functions. They also overlap and are an integral part with a number of different natural heritage features and areas, such as woodlands, wetlands, wildlife habitat, etc. Valleylands contain natural habitat, they link many aspects of the Natural Heritage System, and they facilitate species richness, movement and diversity. Valleylands are defined as a natural area that occurs in a valley or other landform depression that has water flowing through or standing for some period of the year, and includes rivers, streams, other water courses and ravines. Valleylands are the water collection systems for watersheds, providing a vital support to the City's natural environment. In addition to these ecological functions, valleylands may also provide protection from flooding and other natural hazard processes."</i>	Valleyland description text is vague and does not really describe a significant valley i.e. Water at some time of year/ landform depression does not = significant valleyland.	Fix wording as this is too all encompassing. A depression is not a valleyland worth preserving. Flowpaths are dealt with elsewhere.
Section 5.6.1	Identification of Significant Valleylands	Significant valleylands - This was formerly called significant river, stream and ravine corridors	Maps identify features not reflected by the guidelines.
1275, point 1	<i>"Significant valleylands are included in the Green Space Place Type on Map 1, and identified on Map 4 with the corridor width to be determined and delineated on the basis of the following criteria: 1. The valleyland width shall be sufficient to accommodate the natural features and ecological functions that contribute to its significance including water resource functions such as flood plain and erosion hazards, riparian buffers for natural features, ecological functions and water quality and quantity, <u>and provision for future pathways or access trails</u>. This will be determined through the preparation of a secondary plan, environmental impact study and/or subject lands status report."</i>	The pathways are not an integral part of valleylands. The minimum width concept is arbitrary. The appropriate width should be determined on the basis of suitable criteria. Pathways and trails are governed generally by the open space policies. The City will run into problems because these pathways will have to be highways, and highways don't typically belong in a natural heritage area.	Delete the policy
1275, point 2	<i>"Significant valleylands are included in the Green Space Place Type on Map 1, and identified on Map 4 with the corridor width to be determined and delineated on the basis of the following criteria: (...) 2. <u>The minimum width of significant valleylands will be generally comprised of 30 metres on each side of the watercourse measured from the high water mark</u>. The ultimate width of a corridor will be established on a case-by-case basis through application of the Guidelines for Determining Setback and Ecological Buffers, as part of an environmental impact study and/or subject lands status report approved by the City."</i>	Remove first sentence of point 2.	<i>Please revise point 2 of policy to the following: 2. The ultimate width of a corridor will be established on a case-by-case basis through application of the Guidelines for Determining Setback and Ecological Buffers, as part of an environmental impact study and/or subject lands status report approved by the City."</i>
1275, point 2	<i>"Significant valleylands are included in the Green Space Place Type on Map 1, and identified on Map 4 with the corridor width to be determined and delineated on the basis of the following criteria: (...) 2. The minimum width of significant valleylands will be generally comprised of 30 metres on each side of the watercourse measured from the high water mark. The ultimate width of a corridor will be established on a case-by-case basis through application of the Guidelines for Determining Setback and Ecological Buffers, as part</i>	This minimum width is excessively large. It was originally designed to be a trigger distance to review and determine impacts and mitigations not a starting point. Studies may find a smaller width is appropriate. Buffer guidelines calculation table is not scientifically supported.	Remove reference to minimum width. Remove reference to the buffer guideline calculation table.

Environmental – Natural Heritage			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
	<i>of an environmental impact study and/or subject lands status report approved by the City.”</i>		
1276	<p>“Council, in consultation with the conservation authority having jurisdiction, may consider alterations to stream corridors to enhance, rehabilitate and restore the system through such measures as:</p> <ol style="list-style-type: none"> 1. Bank stabilization 2. The creation of riffles and pools 3. Restoration of meandering and natural stream fluvial morphology 4. Plantings 5. Removal of barriers.” 	Does not consider relocation.	Add relocation option.
1282	“Areas of significant wildlife habitat outside of any other natural heritage feature will be identified on Map 4 and included in the Green Space Place Type on Map 1.”	“Significant wildlife outside of any other” – Where is this identified, how is this determined?	Further clarification from City staff required.
1282	“Areas of significant wildlife habitat outside of any other natural heritage feature will be identified on Map 4 and included in the Green Space Place Type on Map 1.”	This statement of automatic mapping of SWH as Open Space is inconsistent with line 1280 that allows some considerations.	Change to subject to EIS, mapping will be altered.
1285	<p>“The water resource system consists of groundwater features, hydrologic functions, natural features and areas and surface water features which are necessary for the ecological and hydrological integrity of the watershed. Groundwater features include recharge/discharge areas, water tables, and aquifers. Surface water features include headwaters, rivers, stream channels, seepage areas, recharge/discharge areas, springs, wetlands and associated riparian lands. Groundwater recharge areas, headwaters and aquifers are key components in the functioning of the hydrologic cycle. Significant groundwater recharge areas, and headwater streams, have been identified in the Subwatershed Plans. Significant groundwater recharge areas are identified on Map 5 and are directly linked to ecological features and functions of terrestrial systems. Significant groundwater recharge areas and highly vulnerable aquifers that are identified through Source Protection Plans or subsequent environmental studies may be added to Map 4 through an amendment to this Plan. Streams are shown as a base map feature on Maps 4 and 5 of this Plan. Headwater streams may be identified as a significant valleyland or an unevaluated valleyland on Map 4 – Natural Heritage. The City will require that the hydrological function of these areas be protected and the linkages and related functions of these features be maintained through its planning approval processes.”</p>	<p>Should recognize that SWM ponds are designed to mimic hydrologic functions to a certain extent and development can alter water delivery by virtue of municipal policies (i.e. no open roadside ditches).</p> <p>City has taken position that SWM should not dump to wetland but how do we sustain a wetland?</p>	<p>Remove reference to require protection of and maintenance of features and allow for some modifications to reflect land use change</p> <p>see above</p>
1286	“Water quality and quantity are addressed from a number of perspectives in this Plan. The Natural Heritage chapter addresses water quality and quantity through the protection of: natural heritage features and areas such as significant and unevaluated valleylands; fish habitat; and groundwater features. Water quality and quantity are also protected through the Natural Resource policies, stormwater management policies, water supply and sanitary sewerage policies, and water conservation policies of this Plan.”	Should add wetlands as a source of quality and quantity protection. However, protection of valleylands does not automatically protect water quality or quantity.	Change protection to the recognition of the part these features can play in quality and quantity protection
Section 5.11 (1291-1292)	Other Vegetation Patches larger than 0.5 Hectares.	No indication on how these are to be evaluated. EMS is not appropriate as it was not designed for such small features. EMS filters are way too low.	Fix to determine what makes a small patch significant. Any ecological review would suggest these small patches would have to support something very rare or unique to be a factor for Natural heritage
1303	“New or expanded infrastructure shall be permitted within the Natural Heritage System only where it is clearly demonstrated through an environmental assessment process under the Environmental	Goal for infrastructure is to keep feature significant.	Agree and this should also be permitted for land use changes other than municipal work.

Environmental – Natural Heritage			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
	Assessment Act, including an environmental impact study, that it is the preferred alternative for the located of the infrastructure.”		
1308, point 3	“Compensatory mitigation may be provided in forms such as, but not limited to: (...) 3. Replacement ratios greater than the one-for-one land area required to mitigate the impacts of the proposed works.”	Does not discuss quality habitat over quantity. I.e. buckthorn dominated area should not be replaced; certainly not at greater than 1;1.	Recognize quality and natural heritage objectives over area. Also permit this approach for changes other than municipal work.
1317	“Ecological buffers are required to protect natural heritage features and areas, and their ecological functions and processes, to maintain the ecological integrity of the Natural Heritage System. Ecological buffers will be required around, or adjacent to, components of the Natural Heritage System, based upon the recommendations of an approved environmental impact study.”	Buffers are required is not always true.	Please revise policy with changes in bold: “Ecological buffers are often needed to protect natural heritage features and areas, and their ecological functions and processes, to maintain the ecological integrity of the Natural Heritage System. Ecological buffers will be required around, or adjacent to, components of the Natural Heritage System, based upon the recommendations of an approved environmental impact study.”
1318	“The location, width, composition and use of ecological buffers necessary to protect natural heritage areas from the impacts of development on the adjacent lands will be specified through application of the Council approved Guidelines for Determining Setbacks and Ecological Buffers as part of an approved secondary plan and/or an environmental impact study.”	Science does not support the buffer guidelines calculation table. I.e. A 25 % slope of existing farm field converted to lawn is in fact an improvement to control soil erosion and sedimentation. If the feature is significant with eroding farm land heading in that direction, why does a lawn and site treated with stormwater management facilities need a 20m buffer. There are other examples. Furthermore, studies show that buffers do not address the targeted impacts. There are better and more economical ways to achieve desired goals that need to be recognized and explored.	Remove this paragraph reference to Buffer Guidelines that use the calculation table to guide buffer distances Revise text to indicate buffers based on current science, findings and which recognize mitigation measures adopted.
1319	“In addition to buffer lands, additional techniques may be required to assist in minimizing the impact of development on the Natural Heritage System, including all of the following: (...)”	These techniques listed help to mitigate buffers and should not be considered additive.	Revise text to prior OP that better reflect these measures as assisting with minimizing impacts.
1319, point 4, 5	“In addition to buffer lands, additional techniques may be required to assist in minimizing the impact of development on the Natural Heritage System, including all of the following: (...) 4. Restriction of public access by providing a limited number of access points to natural heritage areas 5. Lands identified and delineated as ecological buffers may be zoned to permit their inclusion in calculating and applying zoning regulations applicable for the lot. However, unless specified in the permitted uses of the Open Space zone, development and site alteration on lands identified and delineated as ecological bugger shall be prohibited; and unless identified in an environmental impact study acceptable to the City, standard setbacks shall apply from any lands identified as an ecological buffer..”	4. Better than requiring one sided streets which don't control access. 5. Should be the same for ROW widening to allow for lands to be used in the density calculations to meet the density targets of the London Plan.	Also, why can't trails be in the buffer as City staff are now suggesting. Trails go through ESA, significant woodlands and valleylands and the City encourages their use. Yet trails in what is currently farm field is not allowed?
1322-1324	Big Picture Corridors	Plan acknowledges these are not part of the Natural heritage system	Remove reference to them
1323	“The big picture meta-cores and meta-corridors have been refined to reflect local conditions and are identified on Map 4 for reference purposes. The core areas and corridors are represented conceptually, and not to be interpreted as rigid boundary delineations.”	The reference to meta-cores and meta-corridors should be removed altogether from the Plan and its associated mapping. As stated in this policy, they are not to be interpreted as boundaries, and thus the addition of these within the Plan is unnecessary.	Remove policy and associated elements on Map 4.
Section 7.7	Subject Lands Status Reports (SLSR)	Does not specify need for detailed life science work. We agree this is not needed at this stage to make decisions but SLSR would guide what studies are needed. Otherwise data can become considered too old by the time development progresses to approval stage.	Make a note that full inventories are not needed for SLSR.

Secondary Plans			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
1459	<p>"Secondary plans will be adopted by resolution of Council and form part of The London Plan. Where there is a conflict or inconsistency between the parent policies or maps of The London Plan and the policies or maps of a secondary plan, the secondary plan policies or maps will prevail. Otherwise, the parent policies and maps of The London Plan will be read together and in conjunction with the secondary plan."</p>	<p>This section should reference that this is done as an amendment to the London Plan.</p>	<p>Please revise policy with changes in bold: "Secondary plans will be adopted by adoption of a By-Law of Council as an amendment and form part of The London Plan. Where there is a conflict or inconsistency between the parent policies or maps of The London Plan and the policies or maps of a secondary plan, the secondary plan policies or maps will prevail. Otherwise the parent policies and maps of The London Plan will be read together and in conjunction with the secondary plan."</p>
1462, point 8	<p>"A secondary plan may include policies, illustrations and maps for such things as: (...) 8. A tree conservation plan and a tree planting plan, including such things as streetscape planting, public space planting, and renaturalization."</p>	<p>Is something as specific as a tree planting plan realistic to be included in a Secondary Plan? Or would this sort of plan only be the focus of public spaces and not private lands?</p>	<p>Further discussion with City staff required.</p>

Our Tools			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
1471, point 1, 10, 12	<p>"The GMIS will be prepared to meet the following objectives: 1. Plan for, develop infrastructure to support, and finance growth that is in conformity with the City Structure Plan. (...) 10. Do not allow for scattered or "leap frog" development patterns and focus growth where it can complete existing communities. (...) 12. Through the GMIS, the city may defer or accelerate infrastructure projects to respond to development charge reserve fund balances, forecasted development charge revenues, market take up and growth rates."</p>	<p>(1) It should not be considered the role of the GMIS to "plan for growth", as that is the role of the Official Plan. The GMIS is to ensure the development of the required infrastructure to support and finance the growth that is in conformity with the City Structure Plan. (10) This policy should reflect circumstances that it is required to develop lands in certain phases in order to properly be serviced, etc. which may cause temporary or 'scattered' development. (12) For the same reason the city wants flexibility.</p>	<p>Please revise the policy with changes in bold: "(...) 10. Do not allow for scattered or "leap frog" development patterns and focus growth where it can complete existing communities, except when taking into consideration the required phasing of a development"</p>
1474, point 2	<p>Growth Financing "The review of proposed secondary plans, subdivisions, and major planning and development applications will include an evaluation of how the proposal conforms with the Growth Management Implementation Strategy or a Council approved municipal service and financing agreement. Where it does not conform, the proposed plans may be refused."</p>	<p>GMIS is used to implement growth identified through OP policy and is revised on an annual basis in response to growth demands. It is quite likely that development applications will not align with GMIS as GMIS responds to development.</p>	<p>Delete "Where it does not conform, the proposed plans may be refused"</p>
1491	<p>"The required report/studies must also identify whether, and if so, how, the proposed development and/or change in land use will be serviced by transit including an analysis of the implications to the London Transit Commission. Where new transportation infrastructure and/or lands are required or an expansion of the existing transportation infrastructure is necessary to accommodate a proposed development and/or change in land use, the transportation reports/studies will demonstrate that the improved transportation infrastructure will be adequate to accommodate all modes of transportation in an efficient manner and minimizes potential impacts on surrounding uses."</p>	<p>What is this? Who is responsible for completing this? How is this done? Scope? Cost?</p>	<p>Further clarification from City staff required.</p>

Our Tools			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
1518	<i>“Consistent with the values in this Plan, the community engagement process will be transparent, accessible, responsive, inclusive and empowering. It is intended that the process will be based on realistic expectations, mutual respect, and trust.</i>	What is meant by empowering? Empower is defined as the conveyance of power. The power of decision making is vested in Council. The statutory public meeting is designed to allow the public the opportunity to provide input to Council so that they can weigh that input with the input from staff in the decision making process. The public are not the approval authority. The term ‘empowering’ may be misinterpreted and imply that the public may have a larger role than what is considered appropriate by the terms outlined in the Planning Act.	Please revise the policy to remove the term “empowering”
1536	<i>“Council may pass a by-law to authorize increases in the height and density of development beyond what is permitted by the by-law, in return for the provision of such <u>facilities, services, or matters</u> as are set out in the by-law.</i>	Facilities, services or matters – what does “matters” entail? How far does this requirement go, as to what can be requested and what is considered to be reasonable? How is this determined?	Further clarification from City staff required.
1537	<i>“Bonus zoning may be utilized to achieve any of the policy objectives to The London Plan. In conformity with the Planning Act, The London Plan establishes two separate classifications of Bonus Zoning. 1. Type 1 Bonus Zoning – where the proposed bonus zone allows for a height or density that is within the standard height or density limit allowed in the applicable place type. 2. Type 2 Bonus Zoning – where the proposed bonus zone allows for a height or density that exceeds the standard height or density limit allowed in the applicable place type.</i>	What are you really ‘bonusing for’ with type 1? Does not read very well. If the height and density is permitted, why should it be deemed inappropriate and by whom?	Further discussion with City staff required.
1540	<i>“In all cases, the standard height and density of the place type will not be exceeded through Type 1 Bonus Zoning.”</i>	Does not read and ‘mesh’ very well with policy 1537 – so there is no type 1 bonus?	Further discussion with City staff required.
1545	<i>“Greater height or density offered through Type 2 Bonus Zoning will be commensurate with the public value of the facility, service of matter that is provided.”</i>	Public value – how is this measured, does the City make the decision as to what this entails?	Further discussion with City staff required.
1565	<i>“Council may establish differentiated processes for site plan applications based on their complexity and scope.”</i>	Should be referred to as ‘streaming’.	Further discussion with City staff required.
Sections 6.7.2, 6.7.4	6.7.2 – Requirements, 6.7.4 – Matters Addressed by Site Plan Control	These sections are very similar – do they both need to exist, or can this be rewritten together to streamline 6.7 – Site Plan Control section?	Further discussion with City staff required.
1579, point 3,4	<i>“The approval authority may require as a condition of draft plan approval, that the property owner satisfy certain conditions prior to final approval and registration of the plan of subdivision, as in the opinion of the approval authority are reasonable, having regard to the nature of the development proposed for the subdivision. In granting a subdivision, the approval authority may attach conditions, as authorized under the provisions of the Planning Act, relating to the dedication of public amenities such as: (...) 3. Pedestrian Pathways, bicycle pathways and public transit rights of ways, as the approval authority considers necessary 4. Land for commuter parking lots, transit stations and related infrastructure for the use of the general public using highways, as the approval authority considers necessary.”</i>	Highways versus amenity areas? Developers to dedicate land for parking lots? Is this not adding to the encouragement of sprawl? The City needs to outline its legal authority to do this as it cannot increase its powers through the Official Plan	Revise to refer to the requirements and application of the legislation
1593, point 3,4	<i>“In granting a consent, the consent authority may attach conditions, as authorized under the provisions of the Planning Act, including but not limited to: (...) 3. The dedication of pedestrian pathways, bicycle pathways and public transit rights of ways, as the consent authority considers necessary.</i>	Highways versus amenity areas? Developers to dedicate land for parking lots? Is this not adding to the encouragement of sprawl?	Revise to refer to the requirements and application of the legislation

Our Tools			
Paragraph	Excerpt or Reference	Issue/Comment	Proposed Solution / Policy Revisions
	4. <i>The dedication of land for commuter parking lots, transit stations and related infrastructure for the use of the general public using highways, as the consent authority considers necessary.</i>		
1623	<i>“Council will acquire lands for use as parkland primarily through the following methods: dedication; purchase; donation or bequest; and expropriation.”</i>	Council may acquire lands (...)	Please revised policy with changes in bold: <i>“Council may acquire lands for use as parkland primarily through the following methods: dedication; purchase, donation or bequest; and expropriation.”</i>
1625	<i>“Alternatively, Council may require the dedication of parkland at a rate of 1 hectare for every 300 dwelling units proposed, as provided for under the Planning Act. The calculation of dwelling unit potential will be established based on approved lotting in a plan and the zoning applied to any blocks in a draft approved plan of subdivision.”</i>	Note: policy may have to be adjusted in regards to Bill 73.	

Glossary of Terms			
Term	Definition	Issue/Comment	Proposed Revisions

Maps			
Map No.	Title	Issue/Comment	Proposed Revisions
3	Street Classifications	Potential/Proposed/Existing – should be better labelled to illustrate what is there now, and what is proposed. i.e. ‘Rapid Transit Boulevard’ - is this proposed?	Please revise legend to read more descriptively as to what is existing, potential, proposed.
4	Natural Heritage	Big Picture Meta-Cores and Meta-Corridors should be removed from Mapping – as per Policy 1323, they are not to be interpreted as boundaries.	Please remove from Map and Legend.