

Chair and Members
Planning and Environment Committee
City of London

Re: Conservation Master Plan, Medway Valley Heritage Forest ESA (South)

I am writing to provide comments on the *Conservation Master Plan Phase II Medway Valley Heritage Forest ESA (March 2018)*.

First, I can assure committee members that I am very familiar with the City of London *Guidelines for Management Zones and Trails in Environmentally Significant Areas (2016)*. I participated in the development of that document as well as the city's previous trail guideline document.

The March 2018 version of the Conservation Master Plan (CMP) recommends two bridges crossing Medway Creek. I do not support this recommendation. Through a series of policy documents over the past three decades the City of London has recognized the importance of Environmentally Significant Areas (ESAs), including the Medway Valley Heritage Forest. The Official Plan states that ESAs "are to be maintained in their natural state through appropriate management for the purposes for which they have been recognized." It is especially important to note that the Official Plan states that ESAs "are not programmed or managed as parkland." The rationale provided in the CMP for construction of the two bridges would be suitable for a trail system in parkland, but certainly not in an ESA. Improving neighbourhood connectivity and providing connectivity over Medway Creek should not be priority goals for management of an ESA.

It is important to note key aspects of the policy direction given in *Guidelines for Management Zones and Trails in Environmentally Significant Areas (2016)*:

- The ecological integrity and ecosystem health of the ESA shall have priority in any use or design-related decision.
- A properly designed and implemented trail system appropriate to specific management zones and reflecting sensitivity of the natural features will be implemented to achieve the primary objective of protection and the secondary objective of providing suitable recreational and educational opportunities (emphasis added).

The application of any guideline requires interpretation and judgement. Unfortunately, in the case of the Medway CMP 2018, the emphasis has shifted towards recreation rather than protection of ecological integrity and ecosystem health. The impacts of construction of two bridges across the main channel of Medway Creek are not adequately described in the CMP. The proposed bridges would need to provide capacity to handle major flows, and piers would need to be out of the floodway. Construction would be very disruptive to the valley and would cause further impact through increased visitation in future.

I urge Planning and Environment Committee to reject the CMP proposal for two bridges across Medway Creek.

Yours truly,

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