

November 9, 2018

Chair & Members  
Planning and Environment Committee  
City of London  
300 Dufferin Avenue  
London, ON N6A 4L9

**RE: UTRCA – Dingman Creek Subwatershed Screening Area Mapping – Item 2.7  
OUR FILE 13184A, 1402A**

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We are submitting this letter on behalf of Bluestone Properties and Tradewinds Properties & Exeter Dingman Investments. Combined, they own considerable land holdings throughout the City including a portfolio of developed and undeveloped properties.

The purpose of this letter is to identify major concerns with the potential impacts of the UTRCA Regulatory Floodplain Update on large tracts of lands within the City's urban boundary. Based on our review of the staff report and associated mapping, it is our understanding that hundreds, if not thousands of properties could be impacted should the floodplain mapping now encompass these parcels. These properties are comprised of vacant, future development lands as well as fully developed residential, commercial and industrial lands.

Further, major arterial roadways within the south quadrant of the City could now be within floodplain and/or hazard lands. This has significant and far reaching implications on how existing and future development will be accessed as some roads will no longer be considered to provide 'safe access' during major storm events. In addition, the implications on financing, insurance, liability and other related impacts have not yet been assessed but could impose significant challenges well into the future.

While we acknowledge that the updated floodplain mapping and associated "screening areas" are being undertaken by the UTRCA, we strongly urge the City to obtain more detailed information to fully assess the methodology and assumptions that resulted in these preliminary findings.

We support the conclusions outlined in the staff report that indicates the City will continue to work and assist the UTRCA in implementing their floodplain regulation mandate **however, as a first step, all of the stakeholders (City and landowners) need sufficient time to fully review the screening area designation and understand how it was determined.**

As it stands now, the entire planning approval process within the Dingman Creek Subwatershed is stalled until engineered flood mitigation and/or policy solutions are assessed through a subsequent phase of the Dingman EA.

By way of background, MHBC was retained in 2013 by Bluestone and Tradewinds to investigate whether a conversion of these lands from industrial to non-industrial uses was appropriate and warranted. We undertook extensive research and evaluated the potential employment land conversion in the context of

both the PPS and the City of London Official Plan. These documents provided clear direction and criteria for conversion of employment lands. Ultimately, City Council approved Official Plan Amendments that redesignated the majority of lands within the White Oak-Dingman study area for non – employment uses.

A Secondary Plan was to be undertaken following these Official Plan amendments to establish the most appropriate range of uses. In September 2014, we appeared before the Planning and Environment Committee to request that the Secondary Plan be considered a priority and that a report be brought back as soon as possible for Council consideration. It is now November 2018 and we have been advised that advancement of this Secondary Plan will be impacted by the updated floodplain mapping and the screening area approach.

Our concerns are that these lands could remain in the Urban Reserve designation for a prolonged time frame and worse, that the majority of lands may be sterilized from development as a result of this updated floodplain mapping. On a broader basis, many developed properties may be impacted by this screening area designation so as to limit or preclude any future redevelopment. This could have a significant economic impact on the City if extensive areas are constrained due to natural hazard impacts.

**For this reason, it is imperative that the science and technical analysis that formulated these screening areas is thoroughly vetted and verified.**

Our clients have not been able to have any of this floodplain information verified. It is our understanding that City staff has also not been able to review and evaluate the modelling undertaken by the UTRCA. We support the recommendations and conclusions in the staff report that further analysis must occur to identify potential options to mitigate the increased hazard limits. This analysis needs to be open and transparent and, as a minimum, involve all affected stakeholders.

We request that these findings be independently reviewed and that an extensive public consultation process be established before any of these findings are approved.

We find it incomprehensible that such extensive lands areas throughout the entire southern part of the City could be so severely impacted and urge the City to fully examine these findings more thoroughly. As noted above, this could have significant negative impacts on existing developed areas of the City.

In conclusion, we request that direction be given to Civic Administration to undertaken whatever means are available to fully and thoroughly analyse the findings to date and to ensure that affected landowners are brought into the process in a meaningful way. We will be in attendance at the Planning & Environment Committee on Monday November 12<sup>th</sup> and would be available to speak to this matter further and/or respond to questions.

Yours truly,

**MHBC**



Carol Wiebe  
Partner

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