

**London Development Institute  
and  
London Home Builders' Association**

November 12, 2018

Mr. John Fleming  
Managing Director, Planning & City Planner

Mr. George Kotsifas  
Managing Director, Development and Compliance Services & Chief Building Official

Chair and Members of the Planning & Environmental Committee

Re: Upper Thames Conservation Authority - Dingman Creek Subwatershed  
Screening Area Mapping

As there is no accompanying documentation provided by the UTRCA to explain the relevance of the recently released Screening Area mapping, it is impossible for the industry to determine its intentions, except to conclude that the areas being suggested to have some form of designation, are a radical change from prior accepted flood plain areas.

The industry is aligned with the City in its concern that the areas identified within the 'screening area' include significant lands that the City has already identified as growth or development lands and on which the future vision and community planning has been based.

However, as there is no definition or legislative status for the terminology of 'Screening Area', there is also no legislative guidance or indication of the implications for development approvals and municipal infrastructure works within this area. This begs the question of why this report is being flagged as areas where UTRCA will comment and/ or provide approvals on the acceptability of development applications before any City approval. This is a change from the current process for any lands (including these) that are within UTRCA regulated areas.

This also raises the question of how and why were decisions reached by the City with respect to the urban growth boundary, the London Plan, SWAP plans, major infrastructure investments in South London, BRT routing, industrial land strategy, etc with the absence of such critical decision making information. There are serious consequences to altering these significant planning processes at this late date.

City staff have indicated the "Screening Area" preliminary mapping report has not been reviewed and that the UTRCA has provided no documentation to support the 'screening area' findings. City staff have also indicated that a peer review needs to be completed to determine the validity of the modeling that was completed to develop this mapping. The Industry agrees that a comprehensive review is necessary to confirm whether the assumptions, parameters and science used to determine the 'screening area' is in accordance with Provincial guidelines and the generally accepted scientific principles for this watershed modeling.

The City needs to take a proactive approach to mitigate any potential conflicts that this 'screening area' will have on current and future planning applications or planned capital works projects, planning applications and including the issuance of building permits. The City has a vested interest in the development of the lands affected by this 'new' preliminary mapping and should not defer decisions on City of London growth planning and approvals to an outside agency.

The industry is concerned that this report appears to indicate that the City is taking a stance to comply with the "screening area" without the important and justified review of it.

The London Development Industry and the London Home Builders' Association will support the City and the UTRCA to firstly validate the revised Dingman creek watershed modeling and secondly to mitigate consequences of changes to the current regulatory flood plain area.

We ask that the City:

- respond to the UTRCA in an urgent manner that is fitting the significance this unprecedented report will have on the very core of our community's future growth plans;
- encourage and require that the UTRCA immediately provide appropriate information to allow for its review in the hope to resolve the threat this poses to the years of City planning, approved expenditures and works that are already in place, and lastly,
- encourage all parties to immediately work together in an expedient effort to determine a mechanism that will not shut the city down and jeopardize the interests of London taxpayers.

On behalf of the members of the  
London Development Institute and the London Home Builders' Association

Bill Veitch, President, LDI  
Lois Langdon, CEO, LHBA

cc:  
Minister Yakabuski, Ministry of Environment, Conservation & Parks  
Mr. Rick Martens, President, Ontario Home Builders' Association  
Mr. Joe Vaccaro, CEO, Ontario Home Builders' Association