

Glanworth Community Association

London, Ontario

June 23, 2013

To the Mayor and Councillors:

Re: File OZ-8120: 3130 and 3260 Dingman Drive and Rear 4397/4407 Wellington Rd. and the Application by Pen Equity, specifically Patch 10102

Having attended the public participation meeting on June 18th in which Pen Equity's "Gateway London" Project was under discussion, the Glanworth Community Association (GCA) must reiterate its original position as submitted to the Planning Department in December 2012. We are asking that City Council abide by the City of London's land use policy, which is very clear about the issue of woodlands of significance in the city. To repeat, the City of London's Official Plan Policy 15.4.5 with regard to significant woodlands and reports submitted by consultants and developers, states in section 15.5.2 b:

"If the Subject Lands Status Report identifies any lands that, in the estimation of the City, may meet the criteria for determining significance set out in Section 15.4 for specific components of the Natural Heritage System, the City shall require the preparation of an Environmental Impact Study for these lands in accordance with the requirements of 15.5.2. Lands that satisfy the criteria for significance shall be designated as Open Space in conjunction with any Official Plan amendment required for the proposed development."

On June 18 the Planning Committee was presented with clear recommendations from the City's Planning Department regarding the woods in question, recommendations that met Pen Equity more than halfway by permitting all possibilities to develop their commercial complex yet retain the significant woodland on the property intact.

The Planning Committee also heard from the City's Environmental and Ecological Planning Advisory Committee that same evening. With their technical expertise, EEPAC examined the Subject Land Status Report (SLSR) for Patch 10102 prepared by AECOM and revealed that the conclusions AECOM arrived at are not supported by the findings of their own Report. The AECOM Report actually determined that the Patch in question *is* significant; however, it went on to convince readers otherwise by deftly listing "extenuating circumstances," the majority of which are opinion and speculation rather than hard science.

Both the Environmental & Parks Planning Section and the Ministry of Natural Resources (MNR) state that the next step in the process, given the findings of the AECOM SLSR Report, is the **required** Environmental Impact Study (EIS).

The Glanworth Community Association applauds and supports the visionary Downtown Master Plan. That is precisely how a smart, forward-thinking city should be growing in the 21st century: revitalizing its historic core and creating a dynamic, vibrant city centre in which to live, work and play.

The “Gateway London” Project on the other hand is not visionary; it is a glorified shopping centre. It would be a travesty to lose yet another significant city woodland to a shopping mall that may never be fully occupied, given the high rate of existing commercial vacancies across our city. In fact, there is a shopping complex on the north side of the 401 that has 25,000 sq. ft. of commercial space currently available. It’s worth noting as well that this particular complex has been largely empty for a number of years.

The evidence that Patch 10102 be considered “significant” is overwhelming. AECOM’s SLSR revealed just how significant, as Patch 10102 scored “high” in five criteria and “medium” in two criteria of the City of London’s Woodland Evaluation Guidelines. The City of London Planning Department, the Environmental and Ecological Planning Advisory Committee, the Environmental & Parks Planning Section, and the Ministry of Natural Resources have all reviewed AECOM’s SLSR and concur — there is enough evidence to acknowledge the significance of Patch 10102. The decision for City Council should be clear. There can be no immediate approval of the development as Pen Equity envisions it. The next step in the process **must** be the required Environmental Impact Study.

Victoria White
President, Glanworth Community Association

Barbara Shore
Vice President, Glanworth Community Association