

Report to Planning and Environment Committee

To: Chair and Members
Planning & Environment Committee

From: George Kotsifas, P. Eng.
Managing Director, Development and Compliance Services
And Chief Building Official

Subject: Public Participation Meeting Report
Sunningdale Golf and Country Ltd.
600 Sunningdale Road West

Public Participation Meeting on: November 12, 2018

Recommendation

That, on the recommendation of the Senior Planner, Development Services, the following actions be taken with respect to the application of Sunningdale Golf and Country Ltd., relating to a portion of the property located at 600 Sunningdale Road West:

- (a) The comments received from the public during the Public Engagement process attached as Appendix "A" to the staff report dated November 12, 2018, **BE RECEIVED**
- (b) **IT BEING NOTED** that staff will continue to process the application and will consider the public, agency, and other feedback received during the review of the subject application as part of the staff evaluation of the subject application.

Executive Summary

Summary of Request

The requested amendment is to permit a draft plan of subdivision and Zoning By-law Amendments to allow for 114 single detached lots, 4 park blocks and numerous one foot reserve blocks serviced by 3 local streets.

Purpose and the Effect of Recommended Action

The purpose and effect of the recommended action is to:

- i) Present the details of the requested amendment in conjunction with the statutory Public Meeting;
- ii) Preserve the appeal rights of the public and ensure the Municipal Council has had the opportunity to review the requested draft plan of subdivision and Zoning By-law Amendments prior to the expiration of the 180 day timeframe legislated for draft plan of subdivision and accompanying *Planning Act* applications;
- iii) Introduce the proposed development and identify matters raised to-date through the technical review and public consultation period; and
- iv) Bring forward a future recommendation report for consideration by the Planning and Environment Committee, once the technical review is complete.

Analysis

1.0 Site at a Glance

1.1 Property Description

The subject site consists of 20.6 ha of land that is currently operating as a part of the Sunningdale Golf course operations, with approximately 650 meters of frontage on Sunningdale Road West. The subject site is located on the south, side of Sunningdale Road West between Richmond Street and Wonderland Road North.

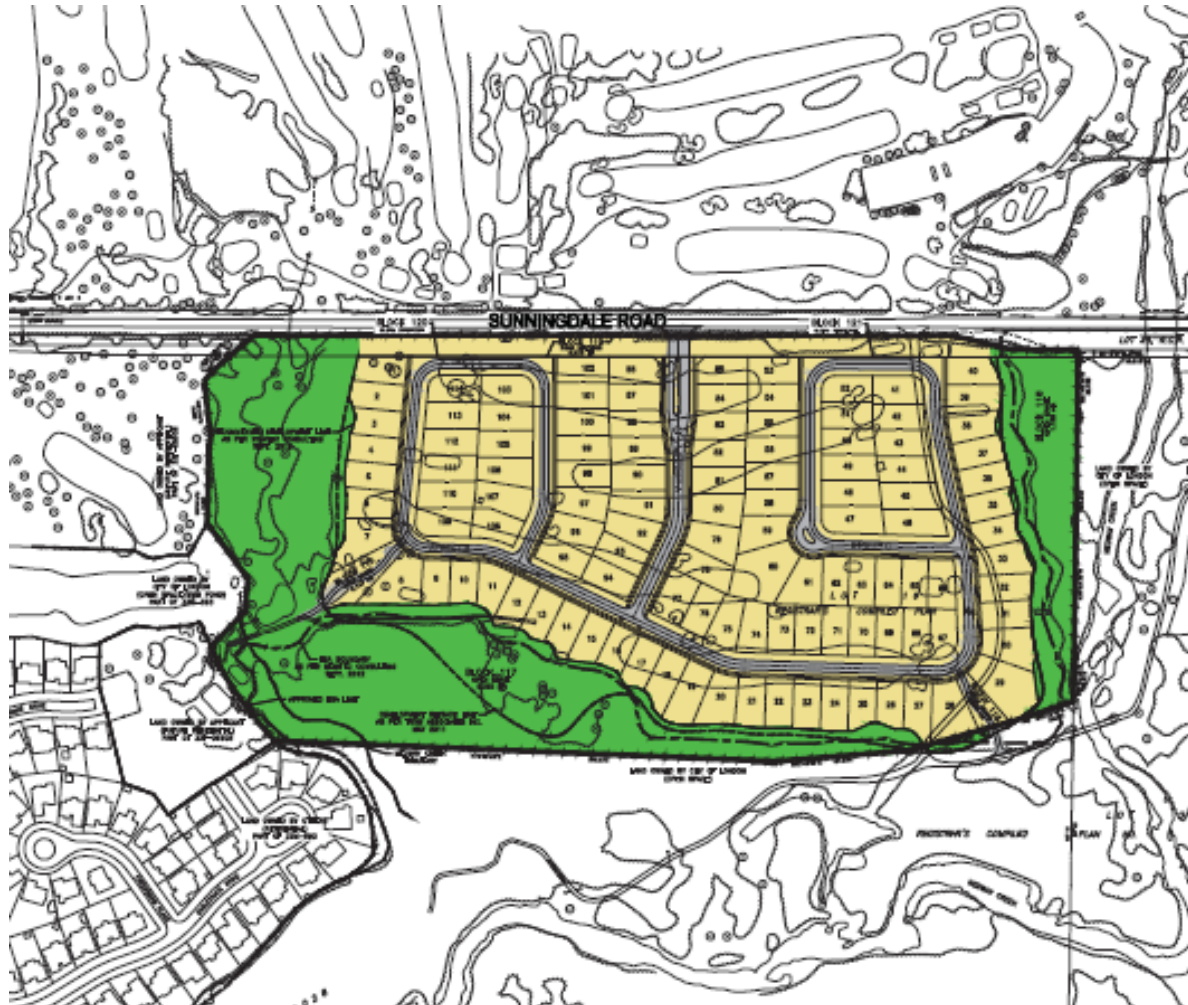


Figure 1: Proposed Master Development Plan

1.2 Current Planning Information (see more detail in Appendix C)

- The London Plan Place Type – Neighbourhoods and Green Space
- Official Plan Designation – Low Density Residential (LDR) & Open Space (OS)
- Secondary Planning Area - Sunningdale Area Plan
- Existing Zoning – Urban Reserve (UR3) Zone, Holding Urban Reserve (h-2*UR3) Zone, Open Space (OS4) Zone, and Open Space (OS5) Zone

1.3 Site Characteristics

- Current Land Use – Golf Course
- Frontage – +/- 650m
- Depth – varies
- Area –20.6ha
- Shape – Irregular

1.4 Surrounding Land Uses

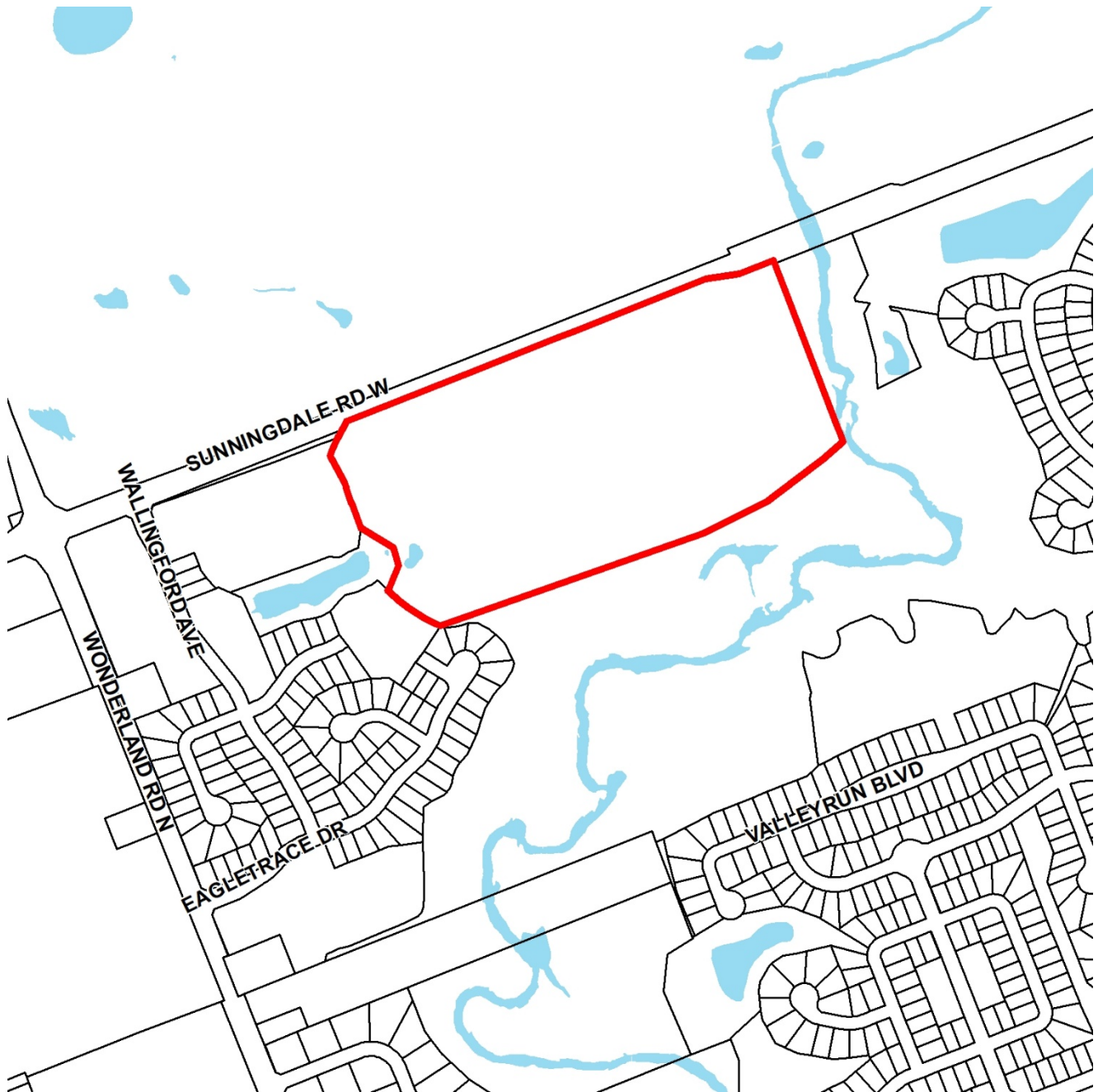
- North – Golf Course
- East – Medway Valley Heritage Forest Environmentally Significant Area

- South Medway Valley Heritage Forest Environmentally Significant Area
- West – Medway Valley Heritage Forest Environmentally Significant Area

1.5 Intensification (identify proposed number of units)

- 114 residential units are being proposed within the subject site which is located outside of the Built-area Boundary, and Primary Transit Area

1.6 Location Map



2.0 Description of Proposal

2.1 Development Proposal 39T-18501/Z-8888

The proposed draft plan of subdivision consist of 114 single detached lots, 4 park blocks and numerous one foot reserve blocks serviced by 3 local streets.

Figure 2: Proposed Draft Plan of Subdivision 39T-18501/Z-8888



2.2 Submitted Studies

A number of reports and studies were submitted to support the requested amendment, including:

- Final Proposal Report
- Hydrogeological Study
- Slope Stability Assessment
- Environmental Impact Study
- Functional Stormwater Management Report
- Environmental Noise Assessment
- Stage 2 Archaeological Assessment

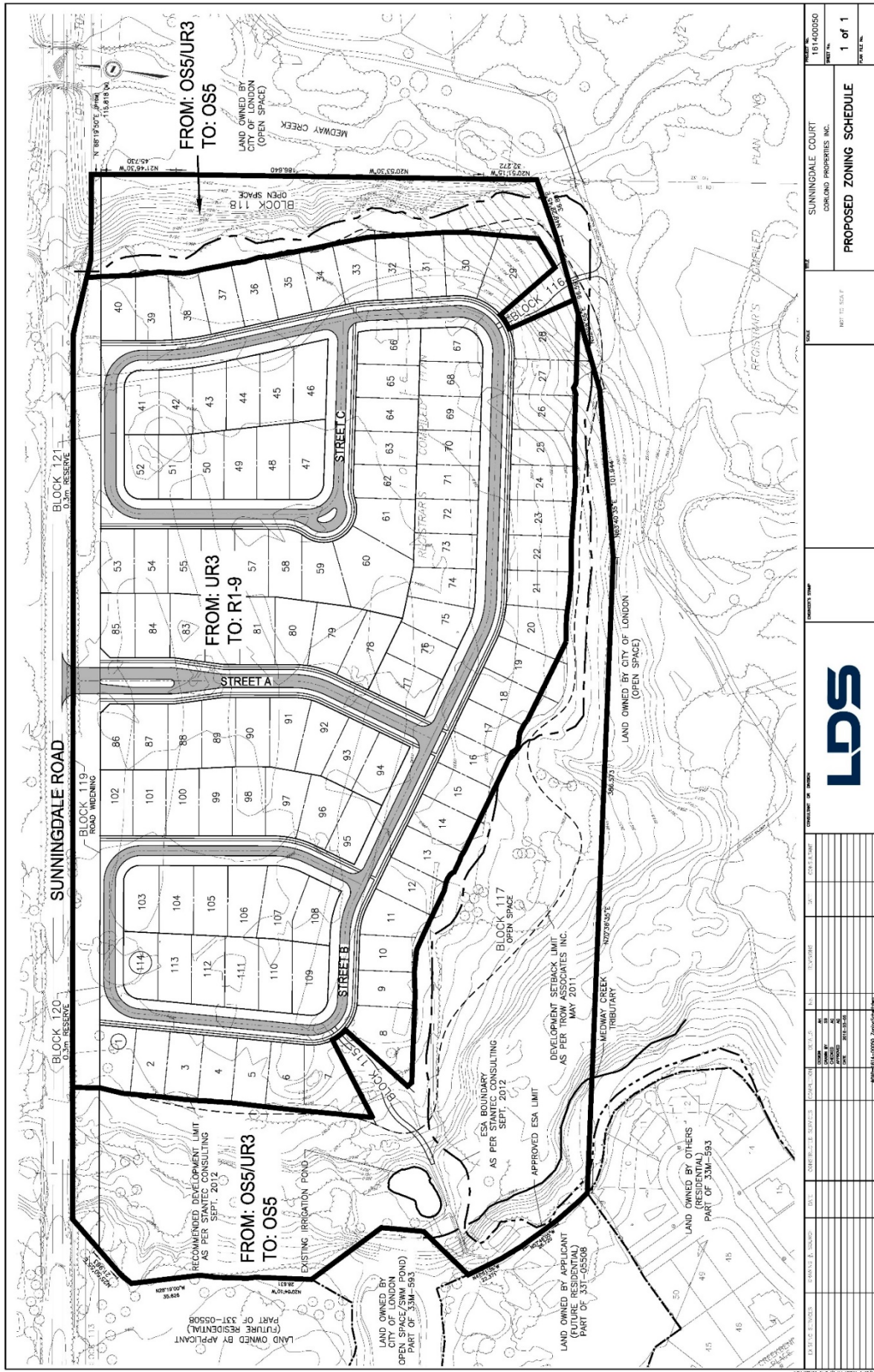
2.5 Requested Amendment

To change the zoning from an Urban Reserve (UR3) Zone, a Holding Urban Reserve (h.2*UR3) Zone and an Open Space (OS4) Zone to a Residential R1 (R1-9) Zone and an Open Space (OS5) Zone. Changes to the currently permitted land uses and development regulations are summarized below.

Zone(s): Residential R1 (R1-9) Zone that permits single detached dwellings with:

- Minimum Lot Frontage of 18.0 metres
 - Minimum Lot Area of 690 square metres
 - Maximum Height of 12.0 metres; and
- An Open Space (OS5) Zone that permits passive recreational uses only.

Figure 3: Proposed Zoning Amendment Map



PROJECT NO.	181400050
PROJECT NAME	SUNNINGDALE COURT CORLAND PROPERTIES INC.
DATE	MAY 10, 2014
SCALE	AS SHOWN
COMPILED BY	AS SHOWN
DATE	AS SHOWN
DESIGNED BY	AS SHOWN
DATE	AS SHOWN
CHECKED BY	AS SHOWN
DATE	AS SHOWN
APPROVED BY	AS SHOWN
DATE	AS SHOWN
PROJECT NO.	181400050
PROJECT NAME	PROPOSED ZONING SCHEDULE
DATE	MAY 10, 2014
SCALE	AS SHOWN
COMPILED BY	AS SHOWN
DATE	AS SHOWN
DESIGNED BY	AS SHOWN
DATE	AS SHOWN
CHECKED BY	AS SHOWN
DATE	AS SHOWN
APPROVED BY	AS SHOWN
DATE	AS SHOWN



3.0 Relevant Background

3.1 Planning History

In 1996, the City initiated an Area Study which included the subject lands. The Sunningdale Area Plan was adopted by Council June 1998. Through the Area Planning process this 20.6ha site was identified for Low Density Residential and Open Space land uses.

3.2 Community Engagement (see more detail in Appendix A)

Notice of Application was circulated on April 3, 2018, and notice was published in The Londoner on April 5, 2018. There were four (4) responses provided through the community consultation period. All 4 responses support the proposed draft plan as submitted. One person did include in their support comments that there be less lots and more green space.

3.3 Policy Context (see more detail in Appendix B)

Provincial Policy Statement, 2014

Section 51(24) of the *Planning Act* provides municipalities with criteria which must be considered prior to approval of a draft plan of subdivision. The Act notes that in addition to the health, safety, convenience, accessibility for persons with disabilities and welfare of the present and future inhabitants of the municipality, regard shall be had for,

- the effect of development of the proposed subdivision on matters of provincial interest;
- whether the proposed subdivision is premature or in the public interest;
- whether the plan conforms to the official plan and adjacent plans of subdivision, if any;
- the suitability of the land for the purposes for which it is to be subdivided;
- the number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity, and the adequacy of them;
- the dimensions and shapes of the proposed lots;
- the restrictions or proposed restrictions, if any, on the land proposed to be subdivided the buildings and structures proposed to be erected on it, and the restrictions, if any, on adjoining land;
- conservation of natural resources and flood control;
- the adequacy of utilities and municipal services;
- the adequacy of school sites;
- the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;
- the extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy; and
- the interrelationship between the design of the proposed plan of subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area.

The London Plan and City of London Official Plan contains Council's objectives and policies to guide the short-term and long-term physical development of the municipality. The policies promote orderly urban growth and compatibility among land uses. While the objectives and policies in the London Plan and City of London Official Plan primarily relate to the physical development of the municipality, they also have regard for social, economic and environmental matters.

The London Plan

The London Plan directs that all of the relevant policies of the Plan that relate to a planning and development applications should be read in their entirety and form the basis for evaluating consistency with the Plan (1577-1578). Proposed plans of subdivision will be evaluated based on all of the policies of The London Plan, including such policies as (1688):

1. Our Strategy
2. City Building Policies
3. Our Tools
4. Place Type Policies
5. Availability of Municipal Services
6. Potential impacts on adjacent and nearby properties
7. The degree to which the proposal fits within its context and policy goals
8. Relevant secondary plans and specific policies
9. Relevant guideline documents

Our Strategy

Relevant planning strategies to support key directions to guide planning and subdivision development include the following:

59_ Direction #5 Build a mixed-use compact city

- *Ensure a mix of housing types within our neighbourhoods so that they are complete and support aging in place.*
- *Build quality public spaces and pedestrian environments that support walking.*

61_ Direction #7 Build strong, healthy and attractive neighbourhoods for everyone

- *Plan for healthy neighbourhoods that promote active living, provide healthy housing options, offer social connectedness, afford safe environments, and supply well-distributed health services.*
- *Design complete neighbourhoods by meeting the needs of people of all ages, incomes and abilities, allowing for aging in place and accessibility to amenities, facilities and services.*
- *Implement “placemaking” by promoting neighbourhood design that creates safe, diverse, walkable, healthy, and connected communities, creating a sense of place and character.*
- *Create social gathering places where neighbours can come together, such as urban parks and public spaces, community centres, family centres, community gardens, cafés, restaurants, and other small commercial services integrated within neighbourhoods.*
- *Protect what we cherish by recognizing and enhancing our cultural identity, cultural heritage resources, neighbourhood character, and environmental features.*
- *Identify, create and promote cycling destinations in London and connect these destinations to neighbourhoods through a safe cycling network.*
- *Support programs that give communities the ability to improve their neighbourhoods in creative and positive ways.*
- *Distribute educational, health, social, cultural, and recreational facilities and services throughout the city so that all neighbourhoods are well-served.*
- *Integrate well-designed public spaces and recreational facilities into all of our neighbourhoods.*
- *Integrate affordable forms of housing in all neighbourhoods and explore creative opportunities for rehabilitating our public housing resources.*

City Building Policies

201_ *New neighbourhoods should be designed with consideration for the character of existing landscapes and topography. The street network and civic infrastructure will be established in consideration of this goal.*

202_ *Buildings and public spaces at key entry points into neighbourhoods will be designed to help establish a neighbourhood's character and identity.*

203_ *Neighbourhoods should be planned to include one or more identifiable and accessible focal points that contributes to the neighbourhood's character and allows for community gathering.*

204_ *Natural heritage is an important contributor to the character of an area and influences the overall street network. Neighbourhoods should be designed to preserve view corridors to natural heritage features and landmarks through lotting patterns, window streets, and building placement.*

211_ *The City's street network will be designed to ensure high-quality pedestrian environments, maximized convenience for mobility, access to focal points and to support the planned vision for the place type.*

212_ *The configuration of streets planned for new neighbourhoods will be of a grid, or modified grid, pattern. Cul-de-sacs, dead-ends, and other street patterns which inhibit such street networks will be minimized. New neighbourhood street networks will be designed to have multiple direct connections to existing and future neighbourhoods.*

213_ *Street patterns will be easy and safe to navigate by walking and cycling and will be supportive of transit services.*

219_ *Neighbourhoods will incorporate a grid or modified grid street network that supports the delivery of emergency services.*

220_ *Neighbourhoods should be designed with a diversity of lot patterns and sizes to support a range of housing choices, mix of uses and to accommodate a variety of ages and abilities.*

228_ *Neighbourhood streets and all infrastructure will be planned and designed to enhance safety by implementing the principles of Crime Prevention Through Environmental Design, encouraging greater levels of passive surveillance, and providing sidewalks of sufficient width to support planned levels of activity.*

242_ *Public spaces will be designed to support the planned vision of the place type by enhancing views and vistas, providing places to meet and gather, and establishing connections.*

243_ *Public facilities, parks, trails, seating areas, play equipment, open spaces and recreational facilities should be integrated into neighbourhoods to allow for healthy and active lifestyles.*

244_ *Public spaces will be located and designed to help establish the character and sense of place of the surrounding area and, where applicable, the positive image of our city.*

247_ *Public spaces should be located and designed within neighbourhoods to ensure that a minimum of 50% of their perimeter will be bounded by a public street.*

518_ *Secondary plans and larger residential development proposals should include a 25% affordable housing component through a mix of housing types and sizes. In keeping with this intent, 40% of new housing units within a secondary plan, and lands exceeding five hectares in size outside of any secondary plan, should be in forms other than single detached dwellings.*

Neighbourhoods Place Type

The subject site is within the Neighbourhoods Place Type in The London Plan and located with frontage onto a Civic Boulevard (Sunningdale Road West). The range of permitted uses include: single detached, semi-detached, townhouses, triplexes, small-scale community facilities, stacked townhouses, fourplexes, and low-rise apartment buildings. The development form is intended between a minimum of 2 storeys and a maximum of 4 storeys, with a potential to bonus up to 6 storeys (Tables 10-12).

Environmental Policies

1412_ 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.

1413_ Ecological buffers will be required on lands contiguous to a specific natural heritage feature or area.

1414_ The location, width, composition and use of ecological buffers necessary to protect natural heritage areas from the impacts of development on adjacent lands will be specified through application of the City Council approved Guidelines for Determining Setbacks and Ecological Buffers as part of an approved secondary plan and/or an environmental impact study.

1415_ 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:

- 1. Discourage rear-lotting adjacent to the Natural Heritage System, and the use of site planning to orient the development away from natural heritage features and areas.*
- 2. The acceptance of lands immediately adjacent to natural heritage areas as part of the required parkland dedication for the proposed development.*
- 3. The use of a geotechnical setback from the boundary of natural heritage areas or natural hazard areas for construction purposes.*
- 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.*
- 6. Development and site alteration on lands identified and delineated as an ecological buffer shall be prohibited unless specified as a permitted use in the Zoning By-law.*
- 7. Setbacks shall apply from any lands identified as an ecological buffer.*
- 8. The creation of individual lots that include lands identified and delineated as ecological buffers is not permitted.*
- 9. Fencing (without gates) along all private lands abutting natural features.*
- 10. Other measures, as determined through a detailed environmental study.*

1416_ Where different components of the Natural Heritage System overlap, the limit of development shall be set at the limit of the maximum ecological buffer as determined through an approved environmental impact study. Where the limits of a natural hazard overlap with the limits of an ecological buffer determined for a natural heritage feature, the development limit shall be set as the greater of the limit of the natural hazard corridor or the limit of the ecological buffer.

Our Tools

1768_ In the review of all planning and development applications, including the review of secondary plans, for residential development adjacent to Civic Boulevards, Urban Thoroughfares, Rural Thoroughfares, Rapid Transit Boulevards, Expressways and Provincial Highways will be subject to all of the following criteria, to ensure that

residential development does not rear or side-lot onto the adjacent streets, as appropriate:

- *Place types that permit residential uses with a medium to high level of intensity will, wherever practical, be sited adjacent to these streets. This form of development provides for greater flexibility in building orientation thereby allowing front facing buildings with amenity space in the rear.*
- *If there is no practical place type alternative, and sensitive place types must locate adjacent to these streets, then subdivision design measures will be encouraged to eliminate the need for noise walls. These subdivision design measures could include, but are not limited to neighbourhood design with window or lay-by streets or service streets; subdivisions with rear lanes; subdivisions on private service streets; or alternative measures that conform with the policies of this Plan*

The 1989 Official Plan

The subject site is within Low Density Residential (LDR) designation, which primarily permits single detached; semi-detached; and duplex dwellings. Multiple-attached dwellings, such as row houses or cluster houses may also be permitted subject to the policies of this Plan and provided they do not exceed the maximum density of development permitted under policy 3.2.2 (30uph).

3.1.2. Low Density Residential Objectives

- *Enhance the character and amenities of residential areas by directing higher intensity uses to locations where existing land uses are not adversely affected.*
- *Encourage the development of subdivisions that provide for energy conservation, public transit, and the retention of desirable natural features.*

3.1.1. General Objectives for all Residential Designations

- *Provide for a supply of residential land that is sufficient to accommodate the anticipated demand for a broad range of new dwelling types over the planning period.*
- *Support the provision of a choice of dwelling types according to location, size, affordability, tenure, design, and accessibility so that a broad range of housing requirements are satisfied*
- *Support the distribution of a choice of dwelling types by designating lands for a range of densities and structural types throughout the City.*
- *Support the development of residential facilities that meet the housing needs of persons requiring special care.*
- *Direct the expansion of residential development into appropriate areas according to availability of municipal services, soil conditions, topographic features, environmental constraints; and in a form which can be integrated with established land use patterns.*
- *Minimize the potential for land use compatibility problems which may result from an inappropriate mix of: low, medium and high density housing; higher intensity residential uses with other residential housing; or residential and non-residential uses.*
- *Support the provision of services and amenities that enhance the quality of the residential environment.*
- *Promote residential development that makes efficient use of land and services.*

15.3.6. Ecological Buffers

- *Ecological buffers serve to protect the ecological function and integrity of the*

Natural Heritage System. Ecological buffers will be required around, or adjacent to, and other components of the Natural Heritage System, based upon the recommendations of an approved Environmental Impact Study. (Clause i) amended by OPA 438 Dec. 17/09)

- *The location, width, composition and use of ecological buffers necessary to protect natural heritage areas from the impacts of development on adjacent lands will be specified through application of the Council approved Guidelines for Determining Setbacks and Ecological buffers as part of a secondary plan and/or an environmental impact study. (Clause ii) amended by OPA 438 Dec. 17/09)*
- *In addition to buffer lands, additional techniques may be required to assist in minimizing the impact of development on the Natural Heritage System, including but not limited to:*
 - *The use of site planning to orient the development away from natural heritage areas;*
 - *The acceptance of lands immediately adjacent to natural heritage areas as part of the required parkland dedication for the proposed development;*
 - *The use of a setback from the boundary of natural heritage areas for construction purposes;*
 - *Restriction of public access by providing a limited number of access points to natural heritage areas;*

19.9.6. Additional Noise Attenuation Policies for Residential Land Uses Adjacent to Arterial Roads.

- *If there is no practical land use alternative, and sensitive land uses must locate adjacent to an arterial road, then subdivision design measures will be encouraged to eliminate the need for noise walls. These subdivision design measures could include, but are not limited to:*
 - *Subdivisions with window or lay-by streets or service roads;*
 - *Subdivisions with rear lanes;*
 - *Subdivisions on private service roads.*
- *The main objective of these design measures is to ensure that residential development does not rear or side-lot onto the adjacent arterial roads.*

4.0 Matters to be Considered

A complete analysis of the applications is underway and includes a review of the following matters, which have been identified to date:

Range of Uses

- If the range of residential, open space and park uses are appropriate

Design

- Location and orientation of residential units along Sunningdale Road West
- Access and orientation of uses to the Medway Valley Heritage Forest Environmentally Significant Area.
- If the proposed subdivision design is consistent with the Our City, Our Strategy, City Building, City Structure, and Place Type policies
- Mix of housing type/form and affordable housing considerations
- Access and connectivity (both vehicular and pedestrian)

Technical Review

- Limits of Environmental Significant Area and Buffer delineations to protect the Medway Valley Heritage Forest Environmentally Significant Area.
- Complete hydrogeological information
- The acceptance of the Environmental Impact Study including rationale for buffering widths and mitigation measures.

More information and detail is available in the Appendices of this report.

5.0 Conclusion

Development Services staff will continue to review the merits of the draft plan of subdivision and Zoning By-law Amendment applications and the comments received with respect to the requested planning applications. A subsequent planning report will be prepared when the review is complete, including a recommended action for the consideration of the Planning and Environment Committee and Municipal Council.

Recommended by:	Craig Smith, MCIP, RPP Senior Planner, Development Services
Reviewed by:	Lou Pompilii, MCIP RPP Manager, Development Planning (Subdivision)
Concurred in by:	Paul Yeoman, RPP, PLE Director, Development Services
Submitted by:	George Kotsifas, P.ENG Managing Director, Development and Compliance Services and Chief Building Official
Note: The opinions contained herein are offered by a person or persons qualified to provide expert opinion. Further detail with respect to qualifications can be obtained from Development Services	

November 6, 2018
/sw

CC: Matt Feldberg, Manager, Development Services (Subdivisions)

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Appendix A – Public Engagement

Community Engagement

Public liaison: On April 3, 2018, Notice of Application was sent to 10 property owners and residents in the surrounding area. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on April 5, 2018. A “Planning Application” sign was also posted on the site.

4 replies were received

Nature of Liaison: The purpose and effect of this application is to permit the development of a subdivision with 114 single detached lots, 4 park blocks and numerous one foot reserve blocks serviced by 3 local streets. **Draft Plan of Subdivision** – Consideration of a draft plan of subdivision consisting of 114 single detached lots, 4 park blocks and numerous one foot reserve blocks **Zoning By-law Amendment** - Possible Amendment to Zoning By-law Z.-1 to change the zoning **FROM** a Urban Reserve (UR3) Zone, a Holding Urban Reserve (h.2*UR3) Zone and an Open Space (OS4) Zone **TO** a Residential R1 (R1-9) Zone which permits single detached dwellings with a minimum lot frontage of 18.0 metres, a minimum lot area of 690 square metres and maximum height of 12.0 metre and an Open Space (OS5) Zone permits passive recreational uses only. The City may also consider the use of holding provisions, to ensure development is street oriented, discourage the use of noise walls, that waterlooping and a second public access is provided and a development agreement will be entered into to the satisfaction of the City

Responses: All 4 responses support the proposed draft plan as proposed. One person did include in their support comment the concern that there be less lots and more green space

Responses to Public Liaison Letter and Publication in “The Londoner”

From: Doug Wastell <[REDACTED]>
Sent: Thursday, April 26, 2018 11:47 AM
To: Smith, Craig; Sue Wastell
Subject: 600 Sunningdale Road West

Hi Craig,

My wife (Sue) and I live at 2429 Waterside Close and back onto this future project. We can see the property directly out the back of our house.

We are writing in support of this development because it will be a great fit for our neighbourhood.

Thank you for your consideration.

Doug Wastell

From: Laura Marshall [REDACTED]
Sent: Friday, April 27, 2018 9:00 AM
To: Smith, Craig
Subject: 600 Sunningdale Rd West Proposal

Hello Mr Smith,

I am a current residence in the north neighborhood of the proposed land development at 600 Sunningdale Road West and I am writing to you to offer my support of the project. I think turning that area of the current golf course into a residential subdivision is a great use of the land as long as it preserves the beautiful medway valley forest. In addition, the only other hesitation I see with the current proposal as it stands is the number of houses to be built - I would like to see fewer houses in order to preserve more green space and also limit the amount of traffic in/out of the subdivision and onto Sunningdale. Other than that, the proposal is a nice change to see rather than having to worry about golfers crossing busy Sunningdale Road.

Sincerely,
Laura Marshall

From: Crown Homes [REDACTED] >
Sent: Monday, May 07, 2018 10:08 AM
To: Smith, Craig
Subject: 600 Sunningdale Rd. W. File: 39T-18501/Z-8889 Applicant: Sunningdale Golf and Country Club

Good morning Craig,

As custom home builders, we have built homes in all Sunningdale developments in London. We have enjoyed an excellent working relationship with Sunningdale and they have been responsible and thoughtful developers of the area.

We are very supportive of the above noted new development as we have several clients looking for good sized lots in the north end of London but no inventory. We are confident that Sunningdale will once again develop this area in a responsible and thoughtful way that will benefit London.

Regards,

Merv

Merv Bell
President
Crown Homes of London Inc.

From: Peter McClure <[REDACTED]>
Sent: Wednesday, May 16, 2018 3:39 PM
To: Smith, Craig
Subject: 600 Sunningdale Road West

Mr Smith,

I would like to express my support of the proposed Draft Plan of Subdivision and Zoning Amendment put forward by Sunningdale Golf and Country Ltd (Corlon Properties Inc.).

This is a much needed development in the north end of London where we have seen the number of available building lots being unable to keep up with demand.

Sunningdale G&C (Corlon) has shown themselves to be one of the premier land development companies in the City and the Neighbourhoods of Sunningdale is one of the most attractive and well thought out subdivisions in London. They have also taken great care during the construction of their previous sites to minimize the impact of construction on the existing neighbourhoods.

Thank You,
Peter McClure

Agency/Departmental Comments

Archaeological

As follow up to our phone conversation earlier this week, please be advised that for the property at 600 Sunningdale Road West (Sunningdale Court, 39T-18501) I have received:

- Stage 1 Archaeological Assessment (P438-0116-2017, dated June 12, 2017 by AECOM) – requiring further archaeological work
- Stage 2 Archaeological Assessment (P131-0063-2017, dated January 24, 2018 by AECOM) – requiring further archaeological work. Note: the greens were not assessed.

There is at least one significant archaeological site (Location 2; AgHh-259) requiring further mitigation. As this is an active golf course, it is not possible to properly assess this site or complete the archaeological fieldwork on the greens. I understand that Stage 3 archaeological assessment for Location 2 (AgHh-259) is being completed presently.

To ensure that the Stage 4 mitigation of impacts for Location 2 (AgHh-259) are completed and the greens are assessed prior to ground disturbing activities, the h-18 holding provision should be placed on the subject property through the Zoning By-law Amendment and conditions included in the Draft Plan of Subdivision to ensure that all archaeological assessments are completed for the subject property and that the Ministry of Tourism, Culture and Sport has concurred that all archaeological concerns on the property have been addressed.

Development Services- Engineering

Please advise the Owner that it is Development Services (engineering) position that the Final Proposed Report provided with this application has not addressed or adequately addressed all of the issues identified in the Initial Proposal Review meeting comments such as, but not limited to, the sight lines, sanitary routing, hydrogeological information.

On that basis Development Services (engineering) propose that the outstanding issues be resolved as indicated in the comments in this memo and in the attached Draft Plan conditions through the recommended revisions to the draft plan and through the next stages of the approval process such as the Focused Design Studies or engineering drawings review stage.

Information

The Wastewater and Engineering Division has the following comments:

1. The subject lands are previously included as part of the sanitary drainage area plans for the Medway Trunk Sanitary Sewer (MTSS) as external area 6 being 18 Ha in size with a maximum population of 990 connecting to the existing 200 mm diameter sanitary sewer at the southeast corner of these lands tributary to the 750mm diameter MTSS.

The IPR and FPR from the applicant mentions a possible future SWM conflict on lands outside the growth boundary and they are proposing that there may be a need to revise the existing accepted sanitary drainage area plans and designs. WADE as part of the IPR process asked for additional detail to be included as part of the FPR but this was not addressed in any detail. As such WADE has included draft plan conditions that require this information at focused design studies.

The applicant and engineering consultant can contact WADE directly so we may better understand their concerns.

2. As part of engineering drawings submission there is the private forcemain from the Sunningdale Golf Course club house that crosses Sunningdale Rd that goes south as mentioned in the FPR. The preference would be to cut the private forcemain back on private lands connected to a private manhole on the Sunningdale Golf Course Golf lands and flow by a gravity connection to the future sanitary manhole on future Sunningdale Court.

The Transportation and Planning Division have the following comments:

1. The sight distance analysis provide in Appendix "H" of the FPR, proposes to fill Sunningdale Road which is not in keeping with the Sunningdale Road Environmental Assessment (EA). The EA ultimate profile in this location is to cut the road. The Owner is to resubmit a site distance analysis recognizing the future ultimate configuration. Furthermore, the City standard for site distance analysis is to achieve the desirable decision site distance as per section 2.1.13 of the Design Specifications and Requirements Manual.
2. The City currently has identified Sunningdale Road West between Wonderland Road and Richmond Street for a road widening project in 2020. Coordination of construction activities may be required to avoid constructor/contractor issues.
3. The City is currently undertaking detailed design for Sunningdale Road West, and as a part of this assignment will be undertaking the design of turn lanes to accommodate this development

The following information has been provided by the Stormwater Management Unit with regards to the report prepared by LDS Consultants Inc., "Hydrogeological Desktop Study – Proposed Residential Subdivision, Sunningdale Court, London Ontario, February 8, 2018".:

As per the attached draft plan conditions (See Condition k), please ensure that an appropriate hydrogeological assessment is completed by a Qualified Professional (QP). Specific elements that the City of London would like addressed in the hydrogeological assessment include, but may not necessarily be limited to the following:

- Installation of boreholes and monitoring wells, to assess the groundwater conditions and hydrogeological regime.
- Evaluation of the hydrogeological environment, including specific aquifer properties (e.g., hydraulic conductivity), groundwater levels, groundwater flow direction, etc.

- Evaluation of water quality characteristics (both groundwater and surface water), and the potential interaction between shallow groundwater and surface water features, including any seeps located within the banks of the creek.
- A completed water balance.
- Evaluation of construction related impacts, and their potential effects on the shallow groundwater system.
- Evaluation of construction related impacts, and their potential effects on local significant features.
- Discussion regarding monitoring plans (if applicable).
- Discussion regarding contingency plans (if applicable).
- Discussion related to the water taking requirements to facilitate construction (i.e., PTTW or EASR be required to facilitate construction?). What is the anticipated radius of influence?
- Discussion regarding mitigation measures associated with construction activities specific to the development (e.g., specific construction activities related to dewatering).
- Discussion regarding the existing PTTW issued by the MOECC for Sunningdale Golf and Country Club (PTTW No. 5340-A7TRPH), and potential interference effects to either of these sources as a result of the development (i.e., short-term or long-term).
- Discussion regarding LID considerations proposed for the development.
- Discussion regarding the presence of fertilizers, herbicides, and pesticides based on historical land use.

Please note the City does not support gateway islands; therefore, please remove the gateway island on Street 'A' at Sunningdale Road from the face of the plan. Since the City does not support gateway islands, Street 'A' road width may be revised to be 21.5 metres wide tapered to 20.0 metres. See condition ac).

Zoning By-law Amendment

Development Services and the above-noted engineering divisions have no objection to the proposed Zoning By-law Amendment for the proposed revised draft plan of subdivision subject to the following:

1. 'h' holding provision is implemented with respect to servicing, including sanitary, stormwater and water, to the satisfaction of the City Engineer and the entering of a subdivision agreement.
2. 'h-100' holding provision is implemented with respect to water services and appropriate access that no more than 80 units may be developed until a looped watermain system is constructed and there is a second public access is available, to the satisfaction of the City Engineer.

Required Revisions to the Draft Plan

Note: Revisions are required to the draft plan as follows:

- i) red line this plan to include 6.0m straight tangents at the intersection of Street "C" & Street "B" opposite lots 33 & 34 to the satisfaction of the City Engineer
- ii) red line this plan to include a 6.0m straight tangent between the two horizontal curves on Street "C" opposite lots 39 & 38 to the satisfaction of the City Engineer
- iii) red line this plan to provide a second access to the site to allow for emergency services access, the access is to be restricted to right in / right out through the construction of a centre island median to the satisfaction of the City Engineer – **MAY BE REVISED BASED ON REVIEW OF SUBDIVISION DESIGN**
- iv) Revise to separate road widening block, Block 119, into two parts east and west of Street 'A'
- v) Clearly delineate block/lot limits
- vi) Remove 'eyebrow' island on Street 'C'

- vii) Remove gateway island from Street 'A' as this City does not support gateway islands
- viii) Revise Street 'A' at Sunningdale Road West to be a minimum right of way width of 21.5 metres for a minimum length of 30.0 metres tapered back over a distance of 30 metres to the standard local right-of-way width of 20.0 metres, to the satisfaction of the City Engineer.
- ix) Label Street 'C', east of Street 'A'
- x) Ensure all geotechnical issues and all required (structural, maintenance and erosion) setbacks related to slope stability for lands within this plan are addressed and make any necessary revisions, to the satisfaction and specifications of the City.
- xi) The Owner shall ensure all streets with bends of approximately 90 degrees shall have a minimum inside street line radius with the following standard:

<u>Road Allowance</u>	<u>S/L Radius</u>
• 20.0 m	9.0 m
• 19.0 m	9.5 m
• 18.0 m	10.0 m

Please include in your report to Planning and Environment Committee that there will be increased operating and maintenance costs for works being assumed by the City.

Note that any changes made to this draft plan will require a further review of the revised plan prior to any approvals as the changes may necessitate revisions to our comments.

Environmental Ecological Planning Advisory Committee (EEPAC)

Sunningdale Court EIS (600 Sunningdale Road West)

October 12, 2017

Reviewed by C. Dyck and S. Levin

MAJOR CONCERNS:

Size of buffers where the buffer is less than 10 m

Lack of information on protection of S2 plant (Two flowered Cynthia) – we believe this omission is sufficient grounds to reject the current version of the EIS

Date of field work predates the construction of the multi-use pathway and bridges

Lack of detail on restoration plans and insufficient monitoring period post restoration

BUFFERS

The rationale for a “relatively small buffer areas” given on page 7.7 is unclear, particularly in explaining why 5 m is sufficient. No explanation is given as to why the construction buffer is only 5 m. Page 7.7 indicates that final buffer requirements are to be determined as part of a site specific EIS. Were these words written at a different time? Isn't the document a final EIS? Regardless, there is no explanation of the buffer widths or a clear buffer management plan (very limited information appears in Table 7-2).

RECOMMENDATION 1: Either the EIS be revised to explain why the buffer widths are as narrow as 5 m. Otherwise, 10 m buffers should be the minimum requirement.

RECOMMENDATION 2: A buffer management plan with ecosite specific native planting recommendations be a condition of the development agreement.

Figures 6 and 7 note there is a 30 m buffer for fish habitat but the legend indicates “no buffer for the golf course pond.” EEPAC assumes this refers to the pond at the west end of the development in an area that, according to the zoning map that went out with the

public notice, will be lands zoned OS5. Therefore, EEPAC is unclear how the pond is not buffered.

RECOMMENDATION 3: EEPAC requests that staff ensure that this pond is retained.

TWO FLOWERED CYNTHIA

In Appendix B, two CC of 10 plants are noted. There is some discussion in the text about one of the plants – Twinleaf. Its general location is noted in the report (7.6). This plant is listed as S4. However, there is absolutely no mention in the text of the other CC 10 plant – Two-Flowered Cynthia. This plant is listed as S2 which means Very Rare (page 3.5 uses the word ‘imperiled’ for S2) in Ontario; usually between 6 and 20 occurrences in the province, or found in only a few remaining hectares. For comparison, False Rue Anemone, which is listed as Threatened, also has an S2 ranking.

RECOMMENDATION 4: Until it is clarified if this plant is off the development site and protected from disturbance, the EIS be considered incomplete.

EDUCATION

It is unclear to the reviewers how access to the ESA from Block 115 will be limited. Although many will stay on the paved path, there are others who will stray. The EIS mentions in a number of places “education” but does not detail what steps will be taken to “educate.” It is also unclear how fencing will help homeowners avoid fertilizer and herbicide use, or avoid planting invasive species (p. 7.6, section 7.1.6)

EEPAC believes the following recommendation would address both of these.

RECOMMENDATION 5:

As a condition of development

- the proponent be required to install signage at Block 115 and 116 with information on the ESA including why it is significant and with normative messages consistent with behaviour science (‘nudges’), that encourage people to do the right thing and stay on designated paths, keep dogs on leash, etc. This is more likely to be considered “ongoing public education” (pgs 7.6 and 7.7). In return, EEPAC recommends the requirement for a home owner “package” be deleted from the development agreement.

- 6 months after assumption, the City send each resident the “Living With Natural Areas” brochure

NET EFFECTS ASSESSMENT (Section 7)

RECOMMENDATION 6: Page 7.13 - EEPAC strongly discourages installing bird boxes as a means of mitigating the impacts of this development and recommends that this be removed from the EIS.

As the EIS points out domestic pets are a threat to birds. It is unlikely that birds will “learn” to avoid domestic pets and installing bird boxes simply makes it easier for cats to find nesting birds. Numerous studies indicate that domestic animals increase stress in wildlife populations as they devote energy to avoidance and flight rather than on reproduction.

ENVIRONMENTAL MANAGEMENT PLAN (Section 8)

The report is very general in terms of the restoration and compensation plantings and plans. For example, page 7.4 says “...buffer management techniques will be used to reduce indirect impacts during construction and over the long term.” There is no clear explanation for this assertion.

In Table 7-3 under “ground disturbance and grading” the report recommends “regular inspection and repair of erosion and sediment control measures” and “regular inspection

of the outlet and downstream for evidence of erosion.” It is unclear how often “regular” inspection will be and who or what agency will be responsible for monitoring and repair.

The EIS has two different proposed monitoring periods, neither of which, in EEPACs opinion and from examples from other developments, is sufficient.

RECOMMENDATION 7: An Environmental Management Plan be prepared for approval by the City and the UTRCA as a condition of development. The EMP must include a clear explanation for how the Plan will minimize indirect impacts on the Natural Heritage features and functions over the long term as well as how often inspections will occur during construction. EEPAC recommends the following elements be included in the EMP:

- a. The areas north and to the south (including the area south of the pathway) of the proposed outlet spillway be restored. It is unclear why this area was not restored when the sewer or the path were built. However, it does provide an opportunity for compensation, given the rip-rap spillway will not provide much opportunity for riparian habit replacement.
- b. Post construction monitoring be for three springs and three falls subsequent to the buffer and restoration plantings.
- c. An Invasive Species Management Plan be required as part of the development agreement, including for lands to be dedicated to the City as part of the City owned ESA (see Table 4-1)
- d. All restoration be with species that are native and appropriate for each ecosite.
- e. Clarification of the proposed “qualitative vegetation monitoring” be provided to EEPAC and if necessary, City staff. Does “quality” refer to the individual plants (i.e. poor health of planted species due to stressors like drought) or does it refer to the “quality” of the overall species composition (i.e. heavy presence of invasive species)? This recommendation should perhaps read “qualitative and quantitative” to determine the degree to which the newly planted vegetation has survived and is thriving. Indicators of overall plant health should be clearly outlined, such that when individual plants do not thrive the warranty period would be triggered, and the vegetation would be replaced.

CONSTRUCTION RECOMMENDATIONS

In section 8.3, it states "while the site is actively being developed/constructed with a log of dates when the facilities (i.e. erosion and sediment controls, construction fencing) were inspected, the condition of the facilities at the time and remedial actions, if any, that were taken." This also appears on page 9.2, recommendation #8. Are these activities that get reported to Development Services? It is unclear which City department receives these reports, or if there any random site visits to see if there is compliance specifically when the development is adjacent to a part of the Natural some other point in time?

As a result of this lack of clarity, EEPAC recommends:

RECOMMENDATION 8:

- a) The city conduct random visits to ensure sediment control measures are in place, particularly when the outlet channel is being constructed.
- b) Clean Equipment Protocol be followed.
- c) No equipment shall be stored or refuelled within 30 m of any natural feature or watercourse.
- d) Gates with no fences must (not should as shown on page 7.4) be erected between the development and the ESA.

e) Removal of vegetation must (not should as stated on page 8.2) take place outside the nesting period of migratory birds.

f) Invasive plants be removed.

STORMWATER

Page 7.3 indicates at the bottom that the proposed outflow is at “an appropriate spot for discharge to Medway Creek.” Nowhere does the report explain why the proposed location is better there than any other spot along the Creek.

RECOMMENDATION 9: A clear rationale for this location be provided before the EIS is accepted.

RECOMMENDATION 10: The development agreement be clear in who (the proponent or the City) is responsible for the ongoing maintenance of the OGS and outlet after assumption (see page 7.11, Table 7-3)

TO BE FORWARDED TO TRANSPORTATION DIVISION

EEPAC notes on page 4.10 that there is a perched culvert preventing fish passage. This should be rectified with the road widening. A box culvert is the preferred option.

QUALITY OF DATA COLLECTION - AMPHIBIAN SURVEYS

EEPAC questions if the frog call count surveys were done in a manner consistent with the Marsh Monitoring Protocol. Although the stations are located in areas off the developable lands, it is unusual to see the 3 required surveys done in two different years. It was also unclear as to when the three minute samples were taken, given the wide range of times shown in Table 3-2 on page 3.4. EEPAC notes that sundown on June 16, 2011 was roughly one hour prior to the time period shown in the Table. As well, two of the survey stations were closer than the 500 m recommended in the Protocol.

OTHER EDITS, ERRORS and OMISSIONS

The legend in Figure 7 notes ‘Fence’ but it is not clearly shown on the Figure. It would be helpful to know if the proposed fencing with no gates is actually along all properties particularly the ones abutting Blocks 115 and 116.

- References to UTRCA Watershed Report Card for the Medway should be updated to the most recent version, released this year.
- The first three paragraphs on page 4.2 appear to be unnecessary as:
 - the proponent will not be addressing the lack of interior forest in the watershed.
 - it is unclear when the benthic survey after 2001 was conducted
 - there is little in this EIS that will implement the recommendations in the third paragraph which seem to relate to needs in other parts of the Medway Creek Subwatershed.

EEPAC believes Table 7.1 on pages 7.2/7.3 includes fewer direct impacts than is likely.

Page 9.2 ends abruptly. It is unclear whether a ‘period’ is simply missing to end the sentence, or whether a portion of the sentence/page is missing.

Environment and Parks Planning

Environmental and Parks Planning has reviewed the submission for the above noted plan of subdivision and offers the following comments:

NATURAL HERITAGE SYSTEM

- The data collection for this project occurred in 2011 and 2012, over 6 years ago. Technically this data must be confirmed through additional field studies, however given the already identified significance of the features and functions this will not be necessary to recollect all of the inventory data.
- However, an inventory of potential snag trees on the golf course is required and the need to address endangered bat species, which are known to occur in the Medway Valley ESA. Compensation for any snag trees on the golf course must be compensated for with bat boxes. This methodology needs to be confirmed with the MNR. Endangered Bat Species are not addressed under Section 5.2 of the EIS.
- The determination of the ESA feature limit has not properly used the Environmental Management Guideline document Boundary Delineation (Section 3.0). For example, portions of the cultural meadow along the rear of many of the proposed lots would be included in the boundary of the ESA due to SWH for Monarch. It would meet criteria 1 of the guideline document for including important habitat zones as part of the feature. Another example would be Guideline 7 applying to some of the cultural communities.
- Section 7.0 impacts to not properly attribute the potential magnitude of impact that the land use change brings through new residential homes, street development, lighting and sound.
- Section 7.0 does not properly apply the City's guideline for determining buffer setbacks and ecological buffers (Section 5.0 of the EMG). Buffer requirements adjacent to ESAs and features which contain sensitive features are larger than what is identified. Provide buffer calculations based on the known features and functions.
- The Significant Stream Corridor narrows substantially around the wetland (pond) habitat located along the west. This is not consistent with minimum Significant Corridor width requirements identified in the Official Plan of 30m.
- Identify the requirement for the pathway located along the rear of the southern lots to be located outside of the ESA and buffer areas.
- Provide data sheets for the field work conducted during the 2011 and 2012 field seasons.
- Based on the above, municipally approved buffers and the ultimate development limit shall be established prior to this application further proceeding to draft approval.

PARKS AND OPEN SPACE

- Required parkland dedication shall be calculated pursuant to section 51 of the Planning Act at 5% of the lands within the application or 1 hectare per 300 units, whichever is greater for residential uses. Parkland dedication calculations for the proposed development are listed in the table below.
- It is the expectation of E&PP that the required parkland dedication will be satisfied through the dedication of parkland and natural heritage lands. Red line revisions will be required to the proposed plan.
- Staff have indicated that the multi-use pathway system is to connect from the existing storm pond on lands immediately west of the subject site to the existing multi-use pathway on the east of the site. This linear park/open space block is to be located adjacent to the rear of lots 9 to 28.
- The two proposed park blocks are to be modified and a third block is to be added.

- Block 115 is to have a minimum frontage of 15 meters;
 - Block 116 is to be reduced to a standard municipal walkway;
 - A third block is to be created at the terminus of Street A (lot 16) with a minimum width of 20 meters to provide a vista into the ESA and connection to the multi-use pathway.
- Based on recommended redline revisions **approximate** parkland land dedication requirements are calculated on the table listed below. It is recognized that buffers and a development limit must be established prior to finalizing these values.
 - In accordance with By-law CP-9, natural heritage and hazard lands will be deducted from the land area used for the calculation of parkland dedication. Within this subdivision, Blocks 117 and 118 were emitted from the area calculation.

Land Use	Area (ha)		Expected Dedication (ha)
Subject Lands	20.695		
Less Open Space Land	6.583		
Total Dedication Required	14.112 @ 5%		0.706
Proposed Park Blocks	Area	Rate	Dedication
115 Park (to be revised)	0.147	1:1	0.147
New Park (to be calculated)	~0.077	1:1	~0.077
117 Open Space	5.385	1:27	0.200
118 Open Space	1.198	1:27	0.044
Total Dedication on Plan (Blocks 115, new, 117, 118)			0.468
Outstanding Balance			0.238
Existing Parkland Credit from 39T-10502			1.049
Balance of Parkland Credit			0.811

- The Official Plan requires neighbourhood parks to be flat and well drained in order to accommodate recreational activities. However, in certain situations Council may accept parkland dedication that contains significant vegetation and topography. The Official Plan notes that these lands will be accepted at a reduced or constrained rate. By-law CP-9 establishes and implements these rates as follows:

- **2.1.3 Land - for park purposes - conveyance – Hazard, Open Space and Constrained Land**

The Corporation retains the right not to accept the conveyance of land that is considered not suitable or required for park and recreation purposes including but not limited to the size of the parcel, hazard lands, wet lands, hydro lands, easements or other encumbrances that would restrict the Corporation's use of the land. Where the Corporation does not request the Owner to convey table land, the Corporation may in lieu accept constrained land at the following ratios:

- 1) Hazard land - 27 hectares of hazard land for every 1 hectare of table land;
- 2) Open space or other constrained lands - 16 hectares of open space or constrained lands for every 1 hectare of table land.

Blocks 117 and 118 will be considered as a portion of the parkland dedication based on the Council approved rate of 27:1 because of the Environmental Significant Area and Hazard

- As part of Focused Design Studies submission, the Owner's Landscape Architect shall prepare and submit a conceptual plan for all park blocks and pathway alignments, to the satisfaction of the City Planner.
- The Owner shall construct 1.5m high chain link fencing without gates in accordance with current City park standards (SPO 4.8) or approved alternate, along the property limit interface of all existing and proposed private lots adjacent to existing and/or future Park and Open Space Blocks. Fencing shall be completed to the satisfaction of the City Planner, within one (1) year of the registration of the plan.
- As part of Focused Design Studies, the Owner shall prepare and submit an implementation plan for recommendations (including a monitoring program) within the approved EIS prepared by Stantec (2017).
- As part of Focused Design Studies, the Owner's qualified consultant shall prepare and submit a tree preservation report and plan for lands within the proposed draft plan of subdivision. The tree preservation report and plan shall be focused on the preservation of quality specimen trees within lots and blocks, and completed in accordance with current approved City of London guidelines for the preparation of tree preservation reports and tree preservation plans, to the satisfaction of the City Planner. Tree preservation shall be established first and grading/servicing design shall be developed to accommodate maximum tree preservation as per the Council approved Tree Preservation Guidelines.
- In conjunction with the first submission of engineering drawings, the Owner's qualified consultant shall undertake, by a Registered Professional Forester, a Hazard Tree Assessment Study for Blocks 117 and 118. The study will undertake a tree risk assessment to identify hazard trees or hazardous parts of any trees within falling distance of residential blocks, park lot lines (this being the hazard tree management zone) and trails (as approved by the city), this also taking into account wind-firmness of adjacent trees affected by any recommended hazard tree removals, and ensure that those hazard trees, or parts thereof, are abated or removed in a timely manner by competent, certified arborists prior to any other persons (workers) entering the hazard tree management zone, or within one year of registration, whichever is sooner.
- The Owner shall prepare and deliver to all homeowners an education package which explains the stewardship of natural area, the value of existing tree cover and the protection and utilization of the grading and drainage pattern on these lots. The educational package shall be prepared to the satisfaction of the City Planner.
- The Owner shall not grade into any open space areas. Where lots or blocks abut an open space area, all grading of the developing lots or blocks at the interface with the open space areas are to match grades to maintain exiting slopes, topography and vegetation. In instances where this is not practical or desirable, any grading into the open space shall be to the satisfaction of the City Planner.
- Prior to construction, site alteration or installation of services, robust silt fencing/erosion control measures must be installed and certified with site inspection reports submitted to the Environmental and Parks Planning Division monthly during development activity along the edge of the woodlot.

Urban Design



Memo

To: Craig Smith, Senior Planner,
Development Services

From: Jerzy Smolarek, Urban Designer

Date: June 22, 2018

RE: 39T-18501: 600 Sunningdale Rd W.

Craig,

Planning Services has reviewed the latest plans for the subdivision located at the above noted address and provide the following comments:

1. In accordance with the London Plan, include a public street along 50% of the perimeter of the open space in order to provide views and physical connection to the existing open space corridor and existing and future pathway network. The following suggested design changes would aid in achieving this policy:
 - a. Design the neighbourhood to create a focal point at the south end of the main entry street incorporating the Open Space, to provide visual connection to the open space as people enter the neighbourhood.
 - b. Include wide pathway blocks (min. 15m) aligned with the ends of public streets to create view corridors and maintain visual connection with the natural feature for safety.
 - c. Alternatively, incorporating a portion of window street along the open space.
2. Ensure lots located along Sunningdale Road W and the proposed window streets adjacent to Sunningdale Road W. are oriented to the arterial road to minimize the need for noise attenuation fencing; shield rear yards with building mass; and increase the amount of active building facades.
3. Incorporation of more intense building forms (i.e. townhouses) along Sunningdale Rd West be considered.

Please feel free to contact me is you have any questions or concerns.

Sincerely,

Jerzy Smolarek, MAUD
Urban Designer

Upper Thames River Conservation Authority (UTRCA)



"Inspiring a Healthy Environment"



June 21, 2018

City of London - Development Services
P.O. Box 5035
London, Ontario N6A 4L9

Attention: Craig Smith (sent via e-mail)

Dear Mr. Smith:

Re: File No. 39T-18501/Z-8888 Application for Approval of Draft Plan of Subdivision & Zoning By-Law Amendment
Applicant: Sunningdale Golf and Country Ltd.
600 Sunningdale Road West, London

The Upper Thames River Conservation Authority (UTRCA) has reviewed this application with regard for the policies in the *Environmental Planning Policy Manual for the Upper Thames River Conservation Authority (June 2006)*. These policies include regulations made pursuant to Section 28 of the *Conservation Authorities Act*, and are consistent with the natural hazard and natural heritage policies contained in the *Provincial Policy Statement (2014)*. The *Upper Thames River Source Protection Area Assessment Report* has also been reviewed in order to confirm whether these lands are located in a vulnerable area. The Drinking Water Source Protection information is being disclosed to the Municipality to assist them in fulfilling their decision making responsibilities under the Planning Act.

PROPOSAL

The applicant is proposing a residential plan of subdivision comprised of 114 single detached dwellings, 3 new local streets and 4 new open space blocks.

CONSERVATION AUTHORITIES ACT

As shown on the enclosed mapping, the subject lands are regulated by the UTRCA in accordance with Ontario Regulation 157/06 made pursuant to Section 28 of the *Conservation Authorities Act*. The regulation limit is comprised of riverine flooding and erosion hazards and although not shown on the Regulation Mapping, there are also regulated wetland features and the associated surrounding areas of interference. The UTRCA has jurisdiction over lands within the regulated area and requires that landowners obtain written approval from the Authority prior to undertaking any site alteration or development within this area including filling, grading, construction, alteration to a watercourse and/or interference with a wetland.

UTRCA Comments
File No.39T-18501/Z-8888

UTRCA ENVIRONMENTAL PLANNING POLICY MANUAL (2006)

The UTRCA's Environmental Planning Policy Manual is available online at:

<http://thamesriver.on.ca/planning-permits-maps/utrca-environmental-policy-manual/>

3.2.2 General Natural Hazard Policies

These policies direct new development and site alteration away from hazard lands. No new hazards are to be created and existing hazards should not be aggravated. The Authority also does not support the fragmentation of hazard lands through lot creation which is consistent with the Provincial Policy (PPS).

3.2.3 Riverine Flooding Hazard Policies

These policies address matters such as the provision of detailed flood plain mapping, floodplain planning approach, and uses that may be allowed in the flood plain subject to satisfying UTRCA permit requirements.

3.2.6 & 3.3.2 Wetland Policies

New development and site alteration is not permitted in wetlands. Furthermore, new development and site alteration may only be permitted in the area of interference and /or adjacent lands of a wetland if it can be demonstrated through the preparation of an Environmental Impact Study (EIS) that there will be no negative impact on the hydrological and ecological function of the feature.

TECHNICAL PEER REVIEW OF SUPPORTING STUDIES

Slope Assessment

UTRCA staff completed a high level review of the submission titled ***Slope Assessment, Sunningdale Court Subdivision*** prepared by exp date March 2015. We advised the applicant by email on May 14, 2018 that there are a number of deficiencies with the geotechnical submission including but not limited to:

- The 2015 Slope Assessment (exp) does not appear to have been updated to reflect the seepage areas that have been identified in the EIS.
- We requested confirmation that the submission has incorporated the responses that were provided by exp in correspondence date May 24, 2011, July 4, 2011 and August 3, 2011 to address the Conservation Authorities interests.
- The cross-sections should be on 11x17 paper and should be accompanied by a full size plan.

It was also noted in Section 4.1 Slope Stability – General that “details regarding the proposed development, layout and site grading have not been examined as part of the current scope of work.” As part of a complete application, an updated geotechnical study was requested by the UTRCA. We seek clarification as to why the actual development was not considered in the updated geotechnical assessment. The UTRCA has advised the it will undertake a review of the geotechnical study once a satisfactory report has been submitted.

UTRCA Comments
File No. 39T-18501/Z-8888

Hydrogeological Assessment & Water Balance Analysis

In the UTRCA's September 18, 2017 comments regarding the Initial Proposal Report for the proposed development, we provided the following advice regarding the preparation of the Hydrogeological Assessment & Water Balance Analysis (italicized text) –

P.20 – Existing Background Studies - a Hydrogeological Study has been prepared. This report was not scoped with the UTRCA. Ideally the EIS and Hydrogeological Assessment (including water balance analysis) should be scoped and prepared in tandem. It is the ecologist's role to identify the features which need to be evaluated and protected. This information is then used by the hydrogeologist to help determine where the monitoring wells need to be installed to evaluate the amount and timing of groundwater input to the features. The water resources engineer's role is to identify/delineate the area contributing surface runoff to the feature for the water balance. This sets up the analysis for the hydrogeological assessment and water balance which shall be prepared consistent with the Hydrogeological Assessment Submissions, Conservation Authority Guidelines to Support Development Applications (June, 2013) by a qualified professional.

The hydrogeological assessment and water balance should be completed on a catchment area basis. For the hydrogeological assessment, a minimum of three monitoring wells (piezometers), not placed in a straight line, in each hydrostratigraphic unit to be investigated, at locations and in a manner appropriate to interpret horizontal flow directions are required. Fluctuations of ground water flow direction need to be considered so that water level measurements from these wells are representative of ground water flows from the aquifer to the nearest water body. Screened intervals of monitoring wells shall be positioned within the geologic horizon (aquifer) which may be in communication with the natural heritage feature (can also be a natural hazard feature e.g. wetland, watercourse). A minimum of one year of monitoring is required.

Once the hydrogeological assessment and water balance analysis have been accepted, the information is then handed off to the ecologist to incorporate into the EIS analysis. The water resources engineer interprets the amount of pre and post development flow coming from the surface water using a water balance analysis, the hydrogeologist determines the volume and timing of groundwater contributing to the feature, while the ecologist uses the information from the water resources engineer and hydrogeologist to determine whether changes in the amount and timing of surface and groundwater from pre to post will impact the natural heritage and natural hazard features that need protecting.

*We note that some consultants do not understand the difference between a water **budget** analysis and a water **balance** analysis and that is why it is important that a water resources engineer complete the water balance analysis in conjunction with the hydrogeologist.*

We remind the proponent that the UTRCA's peer review fee for technical reports is \$1025.00 which includes one comprehensive review and one revised report review. Furthermore, in accordance with our Environmental Policy Manual, the Authority reserves the right to charge additional report review fees. If the submitted Hydrogeological Report (including Water Balance Analysis) does not meet our submission requirements, the UTRCA will return the report to the applicant as incomplete and the incomplete submission will be deemed to be the first review.

UTRCA Comments
File No.39T-18501/Z-8888

The UTRCA has completed a high level review of the **Hydrogeological Desktop Study Proposed Residential Subdivision Sunningdale Court London, Ontario** prepared by LDS dated February 8, 2018. This study was not scoped with the Conservation Authority. We offer the following comments.

As illustrated on Drawing 3 and indicated on page 6, the Site is surrounded on 3 sides (south, east and west) by UTRCA regulated lands. Similarly, a site walk with representatives of the City and UTRCA was conducted on August 13, 2015. The consultation process resulted in confirmation of the boundary of the Medway Creek Valley Heritage Forest ESA as shown on Figure 2, Appendix A completed by Stantec dated October 12, 2017. Wetlands and groundwater dependent ecosystems are present on the Site.

Geotechnical boreholes are useful for defining 'subgrade soils' on Site but are not utilized to assess groundwater conditions on Site. The geotechnical boreholes will be useful to locate a minimum of three boreholes in each aquifer on Site.

Based on the statements in the EIS completed for the Site, e.g. Patches of watercress were noted throughout the length of the watercourse, indicating groundwater discharge throughout the system (p. 4.9 EIS). Further noted on p.4.11 of the EIS, the prevalence of groundwater seeps and watercress are a better indicator of thermal regime. It is stated on page 1-2 of the Hydrogeological Desktop Study, that Mr. David Schmidt authorized a desktop study on March 8, 2017. Given the regulated lands, the adjacent ESA, the general of the EIS that has been submitted for the Site and the direction that was provided but the Conservation Authority at the September 13, 2017 Proposal Review meeting (documented in our correspondence dated September 18, 2017), a desktop study does not meet the requirements of the UTRCA to address the wetland features and natural heritage and groundwater dependent ecosystems on Site. The report is deemed to be unacceptable.

An integrated approach between the EIS and hydrogeological assessment which details the hydrogeological components on Site with the regulated lands and groundwater dependent ecosystems present is required. Again, the Conservation Authority recommends that the applicant arrange a scoping meeting with the UTRCA to establish the terms of reference for the Hydrogeological Assessment and Water Balance Analysis.

Functional Stormwater Management Report

The UTRCA has completed a review of **The Functional Stormwater Management Report Sunningdale Court** dated February 13, 2018 prepared by LDS . We offer the following comments.

1. A portion of the west side of the site contributes runoff to a Tributary of Medway Creek known as the Wonderland Tributary. The UTRCA strongly recommends controlling the storm runoff based on the catchment areas. Approximately a 3.42 ha area is flowing into the Wonderland Tributary to the west under the existing conditions however, only 0.91 ha of the 3.42 ha has been proposed to direct runoff to the Wonderland Tributary under the proposed conditions. The decrease in the catchment area will reduce the runoff contribution to the Wonderland Tributary under the proposed condition thus reducing the base flow contribution to the tributary.

The UTRCA requires that the base flow to the Wonderland Tributary be maintained in order to sustain the benthic and other species within the creek. Please revise the SWM design to

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maintain and control the runoff under the post-development conditions to both the Medway Creek and its Tributary.

Also, Table 3 and Table 6 present the flows to the Wonderland Tributary under the pre- and post-development conditions. The area contributing runoff to the tributary decreases from 3.42 ha to 0.9 ha under the post-development condition but the flows increase under the post-development conditions. Please explain how the runoff increases while the area contributing runoff decreases.

2. It is mentioned that 60 m³/ha erosion control storage is provided for all of the lands that discharge to the Wonderland Tributary. However, it is also mentioned that the majority of the land contributing flow to the Wonderland Tributary will be intercepted and as result, flows to the tributary will be limited to sheet flow only. The report fails to demonstrate how the 60 m³/ha erosion control will be provided on the site under the proposed condition. Please address.
3. Please provide justification for why quantity control is not required and how the runoff from the site will be conveyed safely without causing erosion and local flooding. The referenced study Group 1 Subwatershed Study (Marshall Macklin Monaghan, 1995) was undertaken in the mid 1990's and since that time, significant development has occurred in the catchment of Medway Creek and near this property which may require the need for quantity control.
4. The report generally mentions a variety of SWM LIDs measures in Table 1. Please identify the SWM LIDs that will be used on the site for this development and provide detailed designs of the LID features at the detailed design stage of the project.
5. In Section 1.2 it is mentioned that an enhanced level protection will be provided for water quality using an Oil Grit Separator (OGS). In Section 3.1.3 it is indicated that only one OGS will treat the runoff from catchment areas 201 through 204 which roughly accounts for 10 hectares of the site. Keeping in view the performance of OGS devices, the efficiency of which is reduced over a period of time in the absence of proper and timely operation and maintenance issue, the UTRCA is concerned about the potential impact of the water quality from the site on the natural heritage features of the Medway Creek Corridor and the ESA. Accordingly, please provide an opinion regarding the use of an OGS for water quality.

It is also noted that any flows which exceed the treatment capacity of the OGS facility will bypass the OGS and flow directly to the outlet channel to Medway Creek. Given the ecological significance of the Medway Creek Corridor, please provide more details regarding the potential impacts of the untreated runoff on the natural heritage system. Please also provide more details including the operation and maintenance plan for the proposed OGS at the detailed design stage of the project.

6. On Figure 3, the proposed outlet shows a 750 mm diameter storm sewer with an almost 90 degree bend to convey the flows to the outlet. The UTRCA recommends that a manhole be incorporated before the runoff gets into the outlet in order to avoid the sudden turn and its impact.

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7. In Section 3.1.1 it is indicated that the rear yard drainage of catchment areas 206 and 207 having an area of 2.2 hectares will be conveyed as sheet flow off site. Please provide confirmation that the grading and sheet flow will not have any impacts on the slope.
8. Figure 4 shows drainage area 209 under the post-development conditions but the report mentions area 209i. Please correct the report or update the Figure to accurately represent the drainage areas on the site under the proposed conditions.
9. The proposed measures (i.e. rain barrels and reducing lot grading) mentioned in the water balance which are intended to balance the infiltration deficit on the site will not compensate for the infiltration deficit under the proposed development such etc. Please provide details as to how the infiltration deficit will be compensated.
10. It is indicated that there will be a decrease of 65% runoff contribution to the Wonderland Tributary but that this will have no negative impact on the tributary. The UTRCA does not agree with the statement. Please explain.
11. Please provide riprap sizing at the outlet for the maximum velocity under the 250-year storm. Also, please provide a cross-section of the riprap showing thickness details etc.
12. Please provide a schematic of the hydrologic model under the pre and post-development condition showing the routing of the flows on the site.
13. Please submit a hydrograph for the outlets for the 2, 10, 100 and 250-year storm event under the pre and post-development conditions.
14. Table 1 in Appendix D shows an infiltration of 190 mm for the hydrologic soil C and 310 mm for the same hydrologic soil C. If the consultant is not planning on changing the local soil, then please provide an explanation as to why the infiltration has changed from 190 mm to 310 mm. Please explain.

Also, the infiltration values from the pervious areas under the post-development condition do not make sense as shown in Appendix D Sheet 1. Please check the infiltration values.

15. Please add the land use type next to the soil conditions column in Table 1 in Appendix D for easy comparison of the land uses under the pre- and post-development conditions.
16. Please submit a detailed sediment and erosion control plan at the detailed design stage of the project.

Environmental Impact Study

The UTRCA is still reviewing the EIS and we will provide our comments under separate cover.

Final Proposal Report

References to hazard lands should be revised to natural hazard lands.

P.8 & P. 16 it is indicated that an EIS and Geotechnical Slope Stability Assessment have been completed. As per the UTRCA's comments on the Initial Proposal Report (IPR), a Hydrogeological

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Assessment & Water Balance Study is also required for a complete application. Please revise accordingly.

P.15 & 22 - Make reference to recreational amenities including a system of walkways and trails. Blocks 115 and 116 are proposed to provide a neighbourhood connector to an existing multi-use trail which is located in the Medway Valley Heritage ESA. However, the Record of Consultation from the Proposal Review Meeting (dated November 2, 2017) includes comments from Parks Planning and Open Space indicating that *the multi-use pathway is to be located at the rear of lots 8 to 28.*

The UTRCA requests more details regarding the proposed pathway/multi-use trail alignment, design and grading such that we can confirm whether the necessary Section 28 approvals could be issued. Consistent with UTRCA policy, the pathway/multi-use trail must be located outside of the riverine erosion hazard which includes the 6 metre erosion access allowance.

P.26 – it is indicated that portions of the ESA contains unstable slopes. Please provide clarification regarding the location of the unstable slopes.

DRINKING WATER SOURCE PROTECTION

Clean Water Act

The *Clean Water Act* (CWA), 2006 is intended to protect existing and future sources of drinking water. The Act is part of the Ontario government's commitment to implement the recommendations of the Walkerton Inquiry as well as protecting and enhancing human health and the environment. The CWA sets out a framework for source protection planning on a watershed basis with Source Protection Areas established based on the watershed boundaries of Ontario's 36 Conservation Authorities. The Upper Thames River, Lower Thames Valley and St. Clair Region Conservation Authorities have entered into a partnership for The Thames-Sydenham Source Protection Region.

The Assessment Report for the Upper Thames watershed delineates three types of vulnerable areas: Wellhead Protection Areas, Highly Vulnerable Aquifers and Significant Groundwater Recharge Areas. We wish to advise that the subject lands are identified as being within a vulnerable area. Mapping which shows these areas is available at:

http://maps.thamesriver.on.ca/GVH_252/?viewer=tsrassessmentreport

Provincial Policy Statement (PPS, 2014)

Section 2.2.1 requires that: *"Planning authorities shall protect, improve or restore the quality and quantity of water by: e) implementing necessary restrictions on development and site alteration to:*

- 1. protect all municipal drinking water supplies and designated vulnerable areas; and*
- 2. protect, improve or restore vulnerable surface and ground water features, and their hydrological functions."*

Section 2.2.2 requires that *"Development and site alteration shall be restricted in or near sensitive surface water features and sensitive ground water features such that these features and their related hydrologic functions will be protected, improved or restored."*

Municipalities must be consistent with the Provincial Policy Statement when making decisions on land use planning and development.

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Policies in the *Approved Source Protection Plan* may prohibit or restrict activities identified as posing a *significant threat* to drinking water. Municipalities may also have or be developing policies that apply to vulnerable areas when reviewing development applications. Proponents considering land use changes, site alteration or construction in these areas need to be aware of this possibility. The *Approved Source Protection Plan* is available at:

<http://www.sourcewaterprotection.on.ca/source-protection-plan/approved-source-protection-plan/>

RECOMMENDATION

Given the UTRCA's outstanding concerns regarding the proposed development and the supporting technical studies, we recommend that this application be deferred in order to provide the applicant with the opportunity to respond to the comments and prepare the appropriate studies. Again, we encourage the applicant to arrange a scoping meeting for the Hydrogeological Assessment and Water Balance Analysis.

UTRCA REVIEW FEES

Consistent with UTRCA Board of Directors approved policy, Authority Staff are authorized to collect fees for the review of Planning Act applications. Our fee to review this application is \$5125.00. Our fee to peer review the Technical Reports (Hydrogeological Assessment & Water Balance, Functional Stormwater Management Report, Geotechnical Report and EIS) is \$1025.00 per report for a total of \$4100.00. We will invoice the applicant under separate cover.

We remind the applicant that the Conservation Authority's peer review fee includes **one comprehensive review and one revised report review** and that additional fees will be collected for subsequent reviews.

Thank you for the opportunity to comment. If you have any questions, please contact the undersigned at extension 293.

Yours truly,
UPPER THAMES RIVER CONSERVATION AUTHORITY



Christine Creighton
Land Use Planner
LN/IS/CC/cc

Enclosure – Regulations Mapping (please print on legal size paper to ensure that the scales are accurate)

c.c. Sent via e-mail -
Applicant – Sunningdale Golf and Country Ltd. – Dave Schmidt
UTRCA – Mark Snowsell & Brent Verscheure, Land Use Regulations Officers



July 30, 2018

City of London - Development Services
P.O. Box 5035
London, Ontario N6A 4L9

Attention: Craig Smith (sent via e-mail)

Dear Mr. Smith:

Re: File No. 39T-18501/Z-8888 – UTRCA Comments on EIS
Applicant: Sunningdale Golf and Country Ltd.
600 Sunningdale Road West, London

Further to our comments dated June 21, 2018, the Upper Thames River Conservation Authority (UTRCA) has completed its review of ***Sunningdale Scoped Environmental Impact Study*** dated October 12, 2017 prepared by Stantec. We offer the following comments.

1. Please provide rationale as to why this is a scoped EIS rather than a full EIS.
2. Please determine the catchment areas of the natural features and discuss whether the land use change will affect surface water and groundwater quantity and quality to these areas under the post-development scenario. Include a discussion about the subsurface drains and ponds that, according to Section 4.3.2, currently control surface flow from the existing golf course holes. Also consider that reaches of Medway Creek are known to contain both fish and mussel Species at Risk and that downstream reaches of Medway Creek have been identified as critical mussel habitat. Furthermore, consider that patches of watercress were noted throughout the length of the coldwater Wonderland Road tributary, indicating groundwater discharge throughout the system. How will these features and functions be maintained in the post-development scenario? Show where all surface flows will discharge.
3. The EIS makes reference to the Sunningdale Community Plan which was completed 20 years ago (in 1998). Since that time, new policies and science about buffers have been approved occurred since the
4. In Section 2.6, please describe what CA policies and regulations apply to the subject lands.
5. In Section 2.8, please discuss whether the development meets the DFO self-assessment criteria and whether DFO review is required. Also, in Section 5.7, please provide discussion as to whether the proposed development will result in serious harm to a CRA fishery, and if not, why not.
6. Tables 3-1 and 3-2 lists amphibian call count surveys as June 16 (2011), April 20 (2012) and May 16 (2012). Section 3.2.2 lists amphibian call count surveys as April 29 (2011), May 16 (2011) and

UTRCA Comments on EIS
File No.39T-18501/Z-8888

June 16 (2011). Please confirm the dates and provide the field data sheets in an appendix.

7. In Section 3.2.2, please provide rationale as to why MAM2 and MAM2-2 were not surveyed for amphibians.
8. Please ensure that all recommendations in the last paragraph of Section 4.2.1 are included in Section 9.2. As well, please discuss how road salt and pool drainage will be mitigated, especially since the rear yards will be draining into the natural areas.
9. The MAM2 and MAM2-2 wetlands communities should be listed in Section 4.3.1.
10. In Section 4.3.3 it is indicated that LDS has advised that no significant seepage or infiltration areas were detected in, or directly adjacent to, the subject property. However, this comment is based on a desk top hydrogeological assessment prepared by LDS which has been deemed to be unacceptable. The UTRCA has requested that a proper hydrogeological assessment be submitted as was required during the pre-consultation for the proposed development. Once completed and accepted, the findings of the hydrogeological assessment will need to be incorporated into the EIS.

Note that Stantec recorded locations of significant groundwater seeps and springs, as well as indicators of groundwater seeps such as watercress and skunk cabbage, within and adjacent to the subject lands. LIO also classifies the Wonderland Road Tributary as a cold water watercourse. Please discuss this discrepancy.

11. Section 4.4.2 mentions the importance of Twinleaf as a species with a CC value of 10, yet does not mention the importance of Two-flowered Cynthia, which is also a species with a CC value of 10 and a provincial rank of S2 (imperiled). Please discuss the locations of both of these species, and how they will be protected from the impacts of the proposed development.
12. Section 5.5.2 states that vegetation communities with SRANKS of S1 to S3 could qualify as rare or specialized habitats. Please explain why this section further states that "no rare habitat occurs within the Study Area" when both the S2/S3 FOD7-4 Black Walnut Lowland Deciduous Forest and the S3 FOD7-5 Black Maple Lowland Deciduous Forest occur within the study area. The same concern applies to Appendix D under "other rare vegetation communities".
13. Please provide a discussion as to how the location of the stormwater management outlet was determined. The construction of the outlet will require the necessary approvals pursuant to the Conservation Authorities Act.

In Section 7.1.1, please explain how "an appropriate spot for discharge" was determined.

14. Figure 5 shows the trail connection arrow extending beyond the existing pathway and into FOD 7-4. Please explain.
15. Please include the potential impact and mitigation measure for backyard pools in Section 7.1.6.
16. The boundary of the ESA was established based on the features and functions present on site (as stated in Section 5.8). This includes more than just the woodland features and therefore, it is misleading to state in Section 7.2 that "the ESA boundary includes some areas of successional habitat that in themselves function to buffer the effects on adjacent land uses on established forest edges". These successional areas have many more features and functions than simply as a buffer to adjacent features. In other words, the ESA does not buffer itself. The boundary of the ESA

does NOT include a buffer or a setback and we therefore require additional rationale for the buffers around the ESA. To assist with this, Table 7-2 must include a discussion of buffers in relation to the natural features found in the different sections and an analysis of buffer sizes based on City of London buffer guidelines. The buffer analysis shall also incorporate the findings of the hydrogeological assessment once a proper study has been completed.

Please be sure to consider the following:

- a. Sections A – D, I and J: located near steep wooded slopes (significant valleylands), locally significant wetlands, fish habitat, significant corridors and vegetated floodplain areas. These sections are also located near forest communities adjacent to Medway Creek and to cool-cold water in Wonderland Road Tributary, which are both considered SWH for seeps and springs.
 - b. Sections E-G: located near wetland communities (MAM2, MAM2-2 and OA) which are also confirmed SWH for wetland amphibian breeding habitat and confirmed SWH for Snapping Turtle, a Species of Conservation Concern.
 - c. Sections H and I: located near FOD5-5 Sugar Maple – Hickory Deciduous Forest where Butternut, an endangered Species At Risk, was observed.
 - d. Sections A-G: located near S2/S3 FOD7-4 Black Walnut Lowland Deciduous Forest.
 - e. Sections I and J: located near S3 FOD7-5 Black Maple Lowland Deciduous Forest.
 - f. Section E: located near candidate SWH for Monarch and giant Swallowtail, both considered Species of Conservation Concern.
 - g. Sections A-E: located near candidate SWH for Eastern Wood-Pewee, a Species of Conservation Concern and near the Medway Creek Valley, which is considered SWH as an animal movement corridor for wetland amphibian breeding habitat.
 - h. All Sections: located near FOD communities, which are candidate SWH for bat maternity colony habitat and foraging habitat for Giant Swallowtail, a Species of Conservation Concern.
 - i. The locations of, and appropriate buffers for, Twinleaf and Two-flowered Cynthia.
17. Section 7.1.3 indicates that one of the potential effects of the development is a change to timing, volumes and location of surface water flows into Medway Creek and the Wonderland Road Tributary, yet there is no discussion as to whether these effects will impact the fish populations in the study area and / or downstream. This is needed to determine if the effect is an acceptable impact or requires mitigation.
18. In Table 7-3:
- a. The cool-cold water Wonderland Road Tributary should be considered as a potential impact under hydrology / groundwater.
 - b. Timing windows for birds, bats, turtles and fish should be considered under site grading and construction.
19. Sections 8.1 and 8.2 do not include a discussion pertaining to the protection and mitigation measures for the Wonderland Road Tributary.
20. The UTRCA's preference would be to prohibit grading and/or construction within the buffer areas and the development setbacks. The works should occur within the development envelope, once the development limit has been accepted. If this is not feasible, we require that potential

UTRCA Comments on EIS
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encroachment and works in the buffer and development setback areas be minimized. Please provide more details in this regard including a discussion on the restoration works that would be required in the disturbed areas post-construction.

21. In Section 9.2, please include the timing for the construction recommendations. Also note that recommendation 1 and 2 should refer to Figure 5, not Figure 6.
22. Please separate the plant list in Appendix B by vegetation community.
23. Editorial comments:
 - a. Please ensure that the Upper Thames *Region* Conservation Authority is changed to Upper Thames **River** Conservation Authority in the document.
 - b. Please include the approved 2011 Issues Summary Report (ISR) in an Appendix
 - c. Please include Eastern Wood Pewee under Significant Wildlife Habitat (bullet 4) in Section 5.9
 - d. Appendix D states that areas turtle wintering areas are candidate SWH, whereas Section 5.5 states that "SWH for turtle wintering areas is considered present in this feature". Please change the word "candidate" to "confirmed".
 - e. Appendix D states that seeps and springs are candidate SWH, whereas Section 5.5.2 states that "SWH for seeps and springs is known to occur along the lower slopes of Medway Creek and Tributaries in the Study Area" and that "forest communities adjacent to Medway Creek and the Wonderland Road Tributary are therefore considered as SWH for seeps and springs". Please change the word "candidate" to "confirmed".
 - f. Under Amphibian Movement Corridor in Appendix D, amphibian breeding habitat (wetland) is considered candidate. Please change the word "candidate" to "confirmed".

RECOMMENDATION

As was previously conveyed, given the UTRCA's outstanding concerns regarding the proposed development and the supporting technical studies, we recommend that this application be deferred.

Thank you for the opportunity to comment. If you have any questions, please contact the undersigned at extension 293.

Yours truly,
UPPER THAMES RIVER CONSERVATION AUTHORITY



Christine Creighton
Land Use Planner
TT/CC/cc

Enclosure – Regulations Mapping (please print on legal size paper to ensure that the scales are accurate)

- c.c. Sent via e-mail -
Applicant – Sunningdale Golf and Country Ltd. – Dave Schmidt
UTRCA – Mark Snowsell & Brent Verscheure, Land Use Regulations Officers

Appendix B – Policy Context

The following policy and regulatory documents were considered in their entirety as part of the evaluation of this requested land use change. The most relevant policies, by-laws, and legislation are identified as follows:

Provincial Policy Statement, 2014

- 1.1 Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns
 - 1.1.3 Settlement Areas
- 1.7 Long-term economic prosperity

London Plan

- 54 Our Strategy
- 79 Our City – City Structure Plan
- 193 City Design Policies
- 309 City Building Policies
- 516 Affordable Housing
- 916 Neighbourhoods
- 1556 Secondary Plans
- 1577 Evaluation of Planning Applications

Sunningdale Area Plan

Official Plan

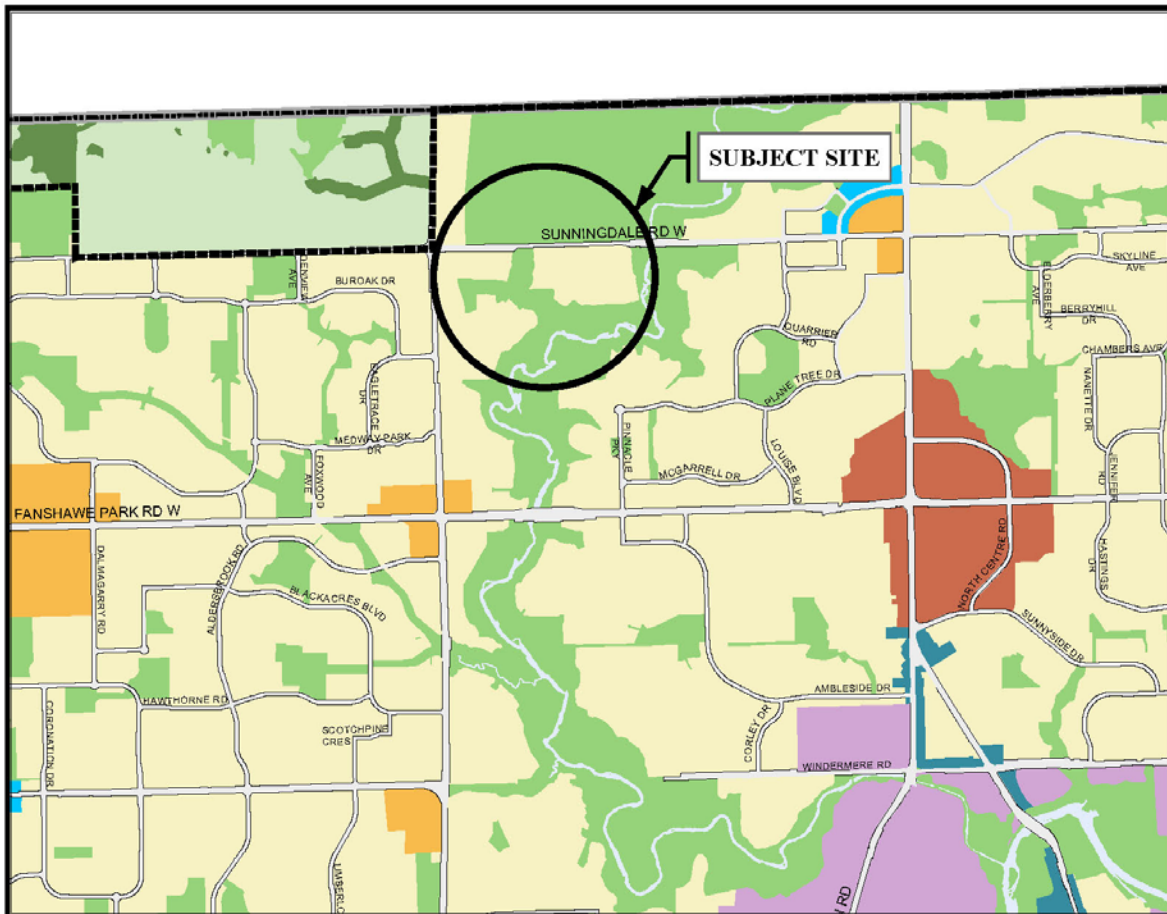
- 2.1 Council Strategic Plan
- 3.1. Low Density Residential
 - 11.1 Urban Design
- 12 Housing
- 15 Environmental Policies
- 16 Parks & Recreation Policies
- 20 Secondary Plans

Z.-1 Zoning By-law

- Section 3: Zones and Symbols
- Section 4: General Provisions
- Section 5: Residential R1 Zone
- Section 36: Open Space

Appendix C – Additional Information

Additional Maps



Legend

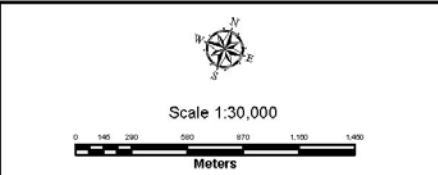
Downtown	Future Community Growth	Environmental Review
Transit Village	Heavy Industrial	Farmland
Shopping Area	Light Industrial	Rural Neighbourhood
Rapid Transit Corridor	Future Industrial Growth	Waste Management Resource Recovery Area
Urban Corridor	Commercial Industrial	Urban Growth Boundary
Main Street	Institutional	
Neighbourhood	Green Space	

This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

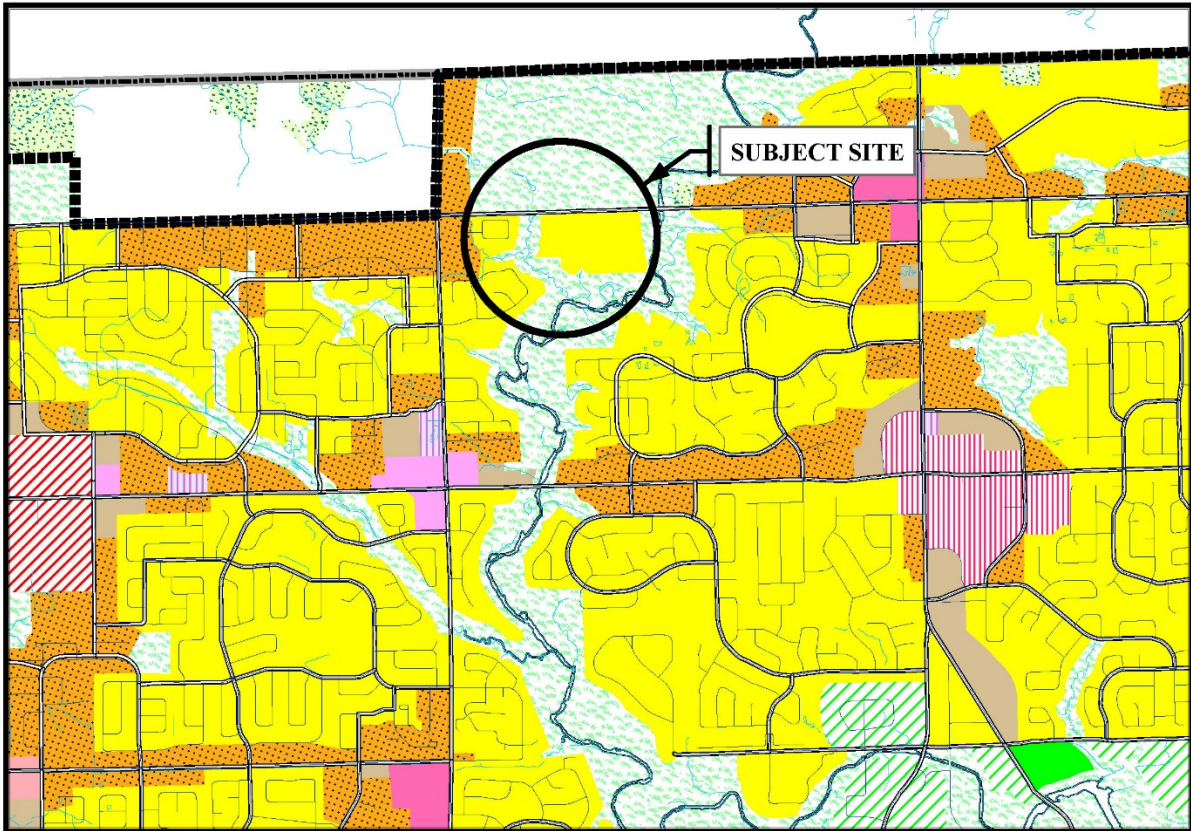
At the time of the printing of this map, the Rapid Transit EA is in progress. This map shows the Rapid Transit Corridors and Urban Corridors to recognize potential alignments. These Place Types will be modified to align with the results of the EA process for the final version of The London Plan.

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**LONDON PLAN MAP 1
- PLACE TYPES -**
PREPARED BY: Planning Services



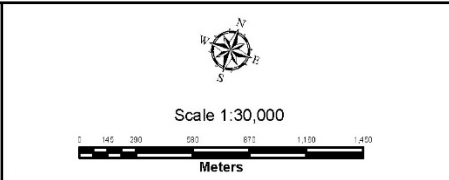
File Number: 39T-18501/Z-8888
Planner: CS
Technician: RC
Date: 10/15/2018



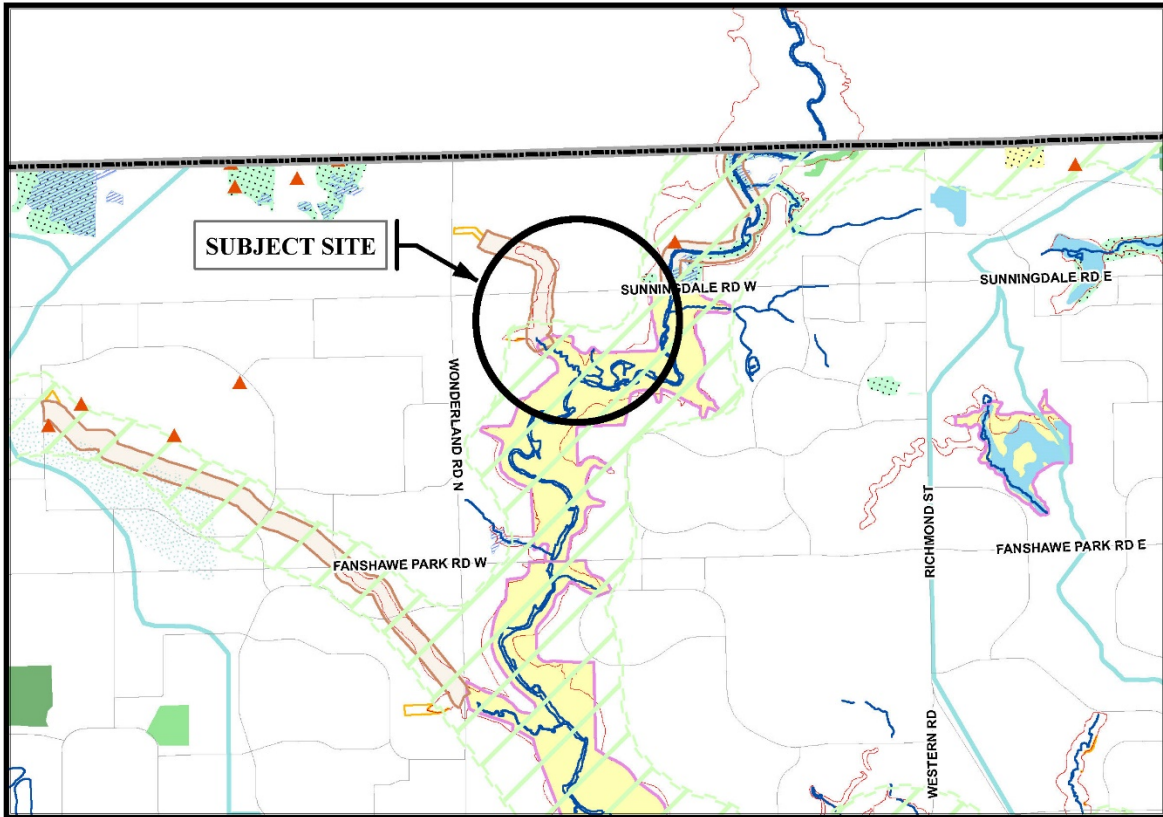
Legend					
	Downtown		Multi-Family, Medium Density Residential		Rural Settlement
	Wonderland Road Community Enterprise Corridor		Low Density Residential		Office Business Park
	Enclosed Regional Commercial Node		Office Area		General Industrial
	New Format Regional Commercial Node		Office/Residential		Light Industrial
	Community Commercial Node		Regional Facility		Commercial Industrial
	Neighbourhood Commercial Node		Community Facility		Transitional Industrial
	Main Street Commercial Corridor		Open Space		Environmental Review
	Auto-Oriented Commercial Corridor		Urban Reserve Community Growth		Agricultural
	Multi-Family, High Density Residential		Urban Reserve Industrial Growth		Urban Growth Boundary

This is an excerpt from the Planning Division's working consolidation of Schedule A to the City of London Official Plan, with added notations.

CITY OF LONDON
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OFFICIAL PLAN SCHEDULE A
- LANDUSE -
 PREPARED BY: Graphics and Information Services




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TECHNICIAN: RC
DATE: October 15, 2018










NATURAL HERITAGE SYSTEM

-  ESAs
-  Potential ESAs
-  Significant Woodlands
-  Woodlands
-  Unevaluated Vegetation Patches
-  Significant River, Stream, and Ravine Corridors
-  Unevaluated Stream and Ravine Corridors
-  Provincially Significant Wetlands
-  Locally Significant Wetlands
-  Unevaluated Wetlands
-  Potential Naturalization Areas
-  Potential Upland Corridors
-  Ground Water Recharge Areas

NATURAL HAZARDS

-  Maximum Hazard Line
- NOTE 1: Hazard Lines shown on this map are approximate. The precise delineation of hazard line mapping available from the Conservation Authority having jurisdiction.*
- NOTE 2: Flood Fringe mapping for certain areas of the city is available from the Upper Thames River Conservation Authority.*

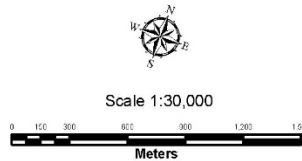
Base Map Features

-  Railways
-  Water Courses/Ponds
-  Streets (refer to Schedule "C")
-  Conservation Authority Boundary
-  Subwatershed Boundary
-  Big Picture Meta-Cores and Meta-Corridors
-  Provincial ANSI Boundary

CITY OF LONDON
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OFFICIAL PLAN SCHEDULE B1
- NATURAL HERITAGE FEATURES -

PREPARED BY: Graphics and Information Services

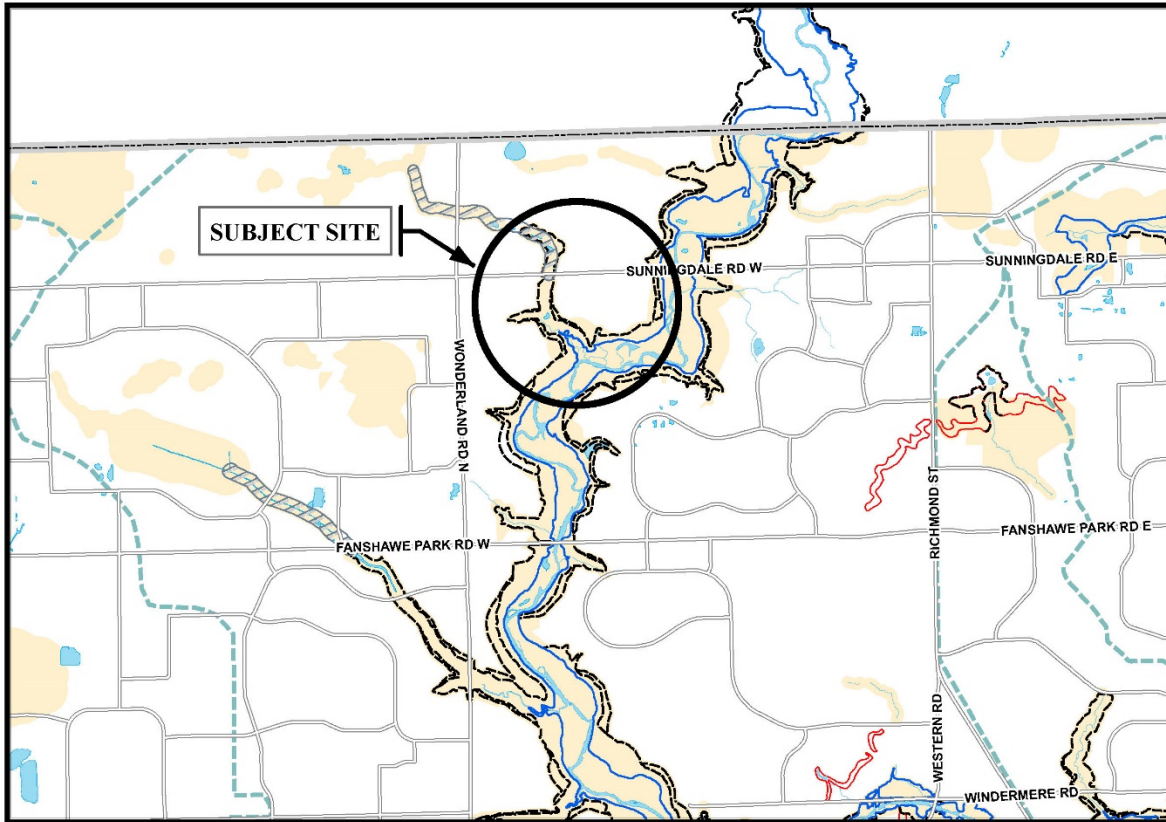


FILE NUMBER: 39T-18501/Z-8888




PLANNER: CS

TECHNICIAN: RC








DATE: October 15, 2018



NATURAL RESOURCES

-  Aggregate Resource Areas
-  Extractive Industrial
-  Emergency Municipal Water Wells

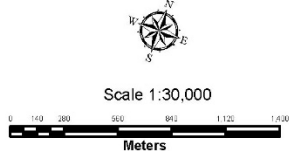
Base Map Features

-  Railways
-  Water Courses/Ponds
-  Streets (refer to Schedule "C")
-  Conservation Authority Boundary
-  Subwatershed Boundary
-  Potential Special Policy Areas
-  Special Policy Area

NATURAL HAZARDS

-  Regulatory Flood Line
NOTE 1: Flood Lines shown on this map are approximate. The precise delineation of flood plain mapping is available from the Conservation Authority having jurisdiction.
NOTE 2: Flood Fringe mapping for certain areas of the city is available from the Upper Thames River Conservation Authority.
-  Riverine Erosion Hazard Limit For Confined Systems
-  Riverine Erosion Hazard Limit For Unconfined Systems
-  Steep Slopes Outside of the Riverine Erosion Hazard Limit
-  Abandoned Oil/Gas Wells
-  Conservation Authority Regulation Limit

CITY OF LONDON
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OFFICIAL PLAN SCHEDULE B2
NATURAL RESOURCES
AND
NATURAL HAZARDS
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PLANNER: CS
TECHNICIAN: RC
DATE: October 15, 2018