

File No.: 19-9554

September 24, 2020

Mr. Gary Smith, via email

101 Meadowlily Road South Development  
Response to Comments

On behalf of our clients, 2690015 Ontario Inc., we would like to thank you for providing comments with regards to the development proposal located at 101 Meadowlily Road South, in London, ON. We are pleased to provide you with the following responses to your comments regarding the Planning Applications presented at the Public Information Centres held on Tuesday September 1, and Thursday September 3, 2020.

1. Comment:

“Our area, our neighbourhood & our environmentally significant area of Meadowlily Woods is of extreme importance to our community & we do wish to protect & preserve its unique character & landscape.”

Response:

The developer understands the neighbours' wants and needs to protect and preserve the unique character and landscape of the area. They have done extensive studies, reviews of the area and research on the surrounding ESA and through consultation with the City of London and the Conservation Authority have designed with this in mind. We understand that longtime residents in the area do not want to see the lands develop, however it is our belief that the proposed development is a good fit within the neighbourhood and provides ample protection and enhancement to the character and landscape of the area, including protection for the surrounding ESA.

2. Comment:

“The context & scope of the neighbourhood & the houses and properties in this community is spacious, rural in character & many people have developed their lands and properties with that in mind. ”

Response:

Despite the current 'rural' characteristic of the street, the street is located within the urban boundary and has been identified in the London Plan as Neighbourhood Place Type which permits single detached, semi-detached and townhome units (London Plan Policies 916-974). The proposed single detached and townhome units are permitted without an Official Plan Amendment (OPA).



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The area adjacent to the site to the north and west are designated Green Space in the London Plan. The proposed development will not only avoid these Green Space designated lands but will provide the necessary buffers and setbacks to help provide for a continuous linear green space network which generally follows the Thames River and its tributaries, as discussed in Policy 761 of the London Plan. The proposal provides new linkages that will create a more continuous and connected green space network and allows for a balanced distribution of locations for passive naturalized areas. The development will also provide for the protection of natural heritage features and areas which have been identified as part of the completed EIA, all in accordance with the London Plan (Policy 761).

3. Comment:

"The setbacks from the road, which are between 25-61 metres from the side of the road making for an open & green vista from the time one turns on to our road down to the Thames River."

Response:

The developer respects that many of the houses are setback 25 - 61 metres from the roadway, however, they were developed as farm dwellings, which typically were setback further. The lands are designated for residential development and under most zoning provisions within the City would only require 6 metres for the front yard setback. That being said, the applicant has designed the development to provide larger than usual setbacks (16 - 23 metres) to respect the character but still allow for the lands to be redeveloped efficiently and effectively.

4. Comment:

"Paragraph 1577: it will need to be shown that the proposal is sensitive to, and compatible with, its context. It should be recognized that the context consists of existing development as well as the planning policy goals for the site and surrounding area." It goes on to say that the following issues include such things as:

1. Consistency with the Provincial Policy Statement and in accordance with all applicable legislation.
2. Conformity with the Our City, Our Strategy, City Building, and Environmental policies of this Plan.
3. Conformity with the policies of the place type in which they are located.
4. Consideration of applicable guideline documents that apply to the subject lands.

Response:

It is our professional opinion that the proposed development application thoroughly addresses and meets all of the evaluation criteria, as laid out in Policy 1578 of the London Plan.



According to the PPS, healthy, livable and safe communities are sustained by promoting efficient development and land use patterns, while accommodating a range and mix residential, employment, institutional and other uses, which sustain the financial well-being over the long term, and promote cost effective development patterns to minimize land consumption and servicing costs. The proposed development is consistent with these policies by encouraging the use of underutilized lands, by proposing a land use that can exist in harmony with the surrounding land uses, and by creating opportunities for increased municipal taxes.

The PPS also identifies that settlement areas should be the focus of growth and development and that their regeneration shall be promoted. Within settlement areas, which the subject site is located in, sufficient lands for a mix of land uses shall be made available through intensification and redevelopment. The subject site is currently residential in nature with one single detached dwelling and associated accessory structures. The rest of the subject site is primarily agricultural and has been maintained this way for several decades. Through the London Plan policies, residential intensification is permitted in the Neighbourhood Place Type designation. The applicant has already shown generous sensitivity to surroundings by proposing a plan of only 89 dwelling units, where otherwise a maximum density allowed of more than 200 units could have been proposed.

From an environmental perspective, the proposed development is consistent with the PPS, as listed in Section 2.1 of the PPS. It is our opinion that there is no negative impact on significant natural heritage resources. The EIS addresses the PPS (see Table 1 and Section 9 of the EIS). There is no direct impact on any provincially significant resources protected by the PPS. The EIS identifies ways to avoid, minimize, and mitigate other potential negative impacts, so there will be no impact on the natural heritage features and functions.

As discussed in Policy 918.2, the neighbourhoods place type designations are to be planned for a diverse mix of housing types and should avoid the broad segregation of different housing types, intensities, and forms. The proposed development provides both the diverse mix of housing types and introduces townhomes as a way to achieve the avoidance of the segregation of different housing types in the neighbourhood. Neighbourhoods are also to be designed to protect the Natural Heritage System, adding to neighbourhood health, identity and sense of place (Policy 918.12). The subject site is, as you know outside of the ESA boundary but has paid close attention to the characteristics and environmental requirements of developing adjacent or near any ESA.

The applicant realizes that the neighbourhood is one of primarily single detached dwellings and has reduced the overall density and is proposing more single detached dwellings than townhomes on the site to maintain the overall character old the area.



As per the requirements in Policy 1578, the applicants completed extensive studies, in addition to the Planning Justification Report, including the following:

- an Environmental Impact Assessment;
- a Stormwater Management Report;
- an Heritage Impact Assessment;
- a Geotechnical Report;
- a Water Balance Review;
- a Tree Protection Plan;
- an Archeological Assessment Reports (Stage 1 & 2); and
- a Noise Compliance Review.

Through consultation with the City of London and the Conservation Authority and the recommendations provided in the above noted reports, the applicants have designed the development to meet the intent and the requirements of this policy as well as many others.

5. Comment:

“We find that the density and volume of this proposal violates what we see as the natural and cultural heritage value of our neighbourhood and community. It does impose too much on the views and vistas of our road and natural landscape of Meadowlily Road South. The size, scope and intensity of this proposal are inconsistent with and insensitive to this setting, context and landscape..... The Architectural Conservancy of Ontario recognized this value in 2013 by awarding its first provincial cultural heritage landscape award to Friends of Meadowlily Woods at its annual meeting in November in Toronto of that same. I would also remind this forum and the Planning Committee of the City of London that we applied to be designated as a Cultural Heritage Landscape in the early fall of that year and was approved in principle but never recognized or finalized.”

Response:

The applicant has completed a Heritage Impact Assessment as part of the submission package. The approved scope of the Heritage Impact Assessment includes designated heritage properties under Part VI of the Ontario Heritage Act, which have been identified as No. 10 and No. 120 Meadowlily Road South. The Heritage Impact Assessment does not include the general vicinity of Meadowlily Road South as a Cultural Heritage Landscape as no such Cultural Heritage Landscape has been recognized or designated through by-law by the City of London. As directed in the London Official Plan, the HIA scope is limited to potential impacts to adjacent properties resulting from the development application for 101 Meadowlily Road South. Unfortunately, if the Cultural Heritage Landscape is not recognized or finalized, it is cannot be part of the scope of the review.



6. Comment:

"The Natural Heritage section of the Provincial Policy Statement suggests on Pages 22-23 that significant natural features like valley lands, upland forests, significant wetlands and water resources fall within the protections of this policy! See in particular on Page 22, "The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features."

Response:

The EIS addresses the PPS (see Table 1 and Section 9 of the EIS). There is no direct impact on any provincially significant resources protected by the PPS. The EIS identifies ways to avoid, minimize, and mitigate other potential negative impacts, so there will be no impact on the natural heritage features and functions.

7. Comment:

"Meadowlily area is identified in many studies and documents as being a provincially significant wetland and in the area of this proposal it seems likely that due to the creek and areas around it, this part of Meadowlily is a groundwater recharge zone and disturbance of this feature could have negative impacts on the natural habitats of this part of Meadowlily or perhaps disturb the wells and groundwater resources of the adjacent properties: 85, 65 and 25 Meadowlily Road South, See Paragraphs of the London Plan: 475h, 1301-3, 1318, 1331, 1347.1, 1362-64, 1555 and Table 12. We find that the hydrology study attached to this report does not adequately address these impacts to our area."

Response:

The Meadowlily Woods Provincially Significant Wetland (PSW) is found in the ESA, along the Thames River, 690m east of the subject property. The closest wetland to the subject property is a small (0.56ha) Forb Mineral Meadow Marsh (MAM2-10) on the east side of Meadowlily Road South, located 45m east of the subject property boundary. This wetland is not part of the mapped PSW, but would likely meet PSW criteria as it could be complexed with the existing PSW, as it is less than 750m from the PSW. The proposed development is well outside of the standard 30m buffer from a PSW, as well as across Meadowlily Road South from the wetland. There will be no impact to this wetland from the proposed development.

Section 4.1 of the EIS acknowledges that "Significant groundwater recharge areas and highly vulnerable areas are identified within the subject property, primarily within the northern half of the property."



The regards to groundwater concerns, typically, development decreases groundwater recharge as a result of additional impervious areas that directs runoff to sewer systems. The design approach for the development is to direct runoff to subsurface infiltration galleries in an effort to maintain the amount of groundwater contribution that the existing site generates. Section 5.3 in the Stormwater Management Draft Report (Water Balance) explains this in more detail.

As indicated in the Geotechnical & Hydrogeological Report and the Water Balance Report, the northern portion of the Site is located within a Significant Groundwater Recharge Area (SGRA) and within a Highly Vulnerable Aquifer (HVA). Groundwater seepage into the Unnamed Creek south of the Site was identified during a Site Visit. Groundwater chemistry of the shallow groundwater table on site and the Unnamed Creek were compared and varied significantly which indicate that the groundwater seepage provides only minor recharge to the creek. Also as indicated in the Water Balance report, LID features are proposed for the development which are anticipated to maintain the existing infiltration quantity after development. Through the use of the LID features, it is anticipated that there will not be negative impacts on downstream receivers.

A review of the MECP well records within close proximity of the Site (~500m) was conducted as part of the Geotechnical & Hydrogeological Report. No wells (residential or otherwise) in the reviewed area, in particular 25, 65 and 85 Meadowlily Road South, were identified as drawing from the shallow unconfined aquifer identified in the northern part of the Site. Therefore it is not anticipated there will be any negative impacts by the proposed development on nearby wells.

8. Comment:

"The Environmental Impact Study seems to be a bit too quick and easy about the impact on the site with regard to significant birds and other plants and features in terms of mitigation actions that would be more thorough and intensive in providing habitat and protection for these species: Eastern Meadowlark, barn swallow, butternut and the bat study seems inadequate to the potential for important nesting areas being disturbed there. The Conservation Master Plan for this area goes into considerable detail about protecting a vulnerable species of bat for our immediate area, 4.4.3, Page 37. The study seems too rushed and incomplete to deal with these concerns: How many site visits were conducted and for how many seasons?"

Response:

The EIS was completed in accordance with the City's Environmental Management Guidelines (2007) and as per the Issues Summary Checklist Report (i.e. Terms of Reference) that was prepared during the Site Suitability and Scoping meeting held with representatives from NRSI, Dillon Consulting Limited, the City of London, and the



Environmental and Ecological Planning Advisory Committee (EEPAC) (see the Introduction of the EIS, as well as Appendix I of the EIS).

As outlined in Table 2 of the EIS, the subject property was visited on 8 occasions between June and September, 2019 (three seasons), by biologists from NRSI to assess the natural heritage within the subject property and on adjacent lands. In addition, NRSI staff that undertook the EIS also completed the Meadowlily Woods ESA Conservation Master Plan, Phase 1 (NRSI 2019) study, so are very familiar with the area.

The EIS will be reviewed by the City and EEPAC to ensure it was completed in a fulsome manner. NRSI has corresponded with the Ministry of Environment, Conservation and Parks (MECP) to ensure no impact to Butternut and potential Species at Risk bats.

To assess whether or not Species at Risk bats are using the subject property, a bat habitat assessment and bat exit surveys were undertaken, as described in Section 3.1.6 of the EIS. These surveys were completed following the most recent protocols set out by the Ministry of Natural Resources and Forestry (MNRF). The surveys were very thorough.

Breeding bird surveys were undertaken by NRSI as per standard and accepted protocols. Eastern Meadowlark (*Sturnella magna*) was not observed. A single Barn Swallow (*Hirundo rustica*) was observed foraging over the subject property, but this species is not nesting on the subject property (a search for Barn Swallow nests was completed). Butternut (*Juglans cinerea*) was observed and is being addressed through the Endangered Species Act, Ontario Regulation 242/08 Section 23.7. The one Butternut on the subject property that is protected by the Endangered Species Act is within the ESA and is to be retained. Impact to 0.27ha of its habitat will require compensation in accordance with O. Reg. 242/08, as addressed in the EIS (Section 5.6).

9. Comment:

"It seems that there ought to be more discussion with the northern neighbour to this property on the part of the Thames-Talbot Nature Reserve and a review of the plan by the Upper Thames Conservation Authority and the Environmental and Ecological Advisory Committee ought to be consulted."

Response:

EEPAC attended the Scoping meeting for the EIS and will review the EIS. The Upper Thames Conservation Authority (UTRCA) was invited to participate in the study, however, delegated review on this matter to the City of London, as they have minimal regulated lands within the subject property, entirely contained within the ESA and approximately 25m from the development boundary.



10. Comment:

“Given the proximity of this to the Thames River and the impacts this might have on runoff and potential for direct or inadvertent pollution from such an intense and drastic change in surface coverage, paving materials and disturbance underground with foundations and digging for new buildings of this size and scope, more depth and scope ought to be taken.”

Response:

Stormwater management best practices dictate that runoff generated within a development are managed within that footprint. This approach was followed for the development to mitigate the impacts of changes to surface coverage (See response to comment 8.). Buildings of this size will not require deep foundations that are commonly associated with aquifer damage. Underground disturbance will be limited to the depth of excavation for a typical house foundation. This depth is still sufficiently shallow relative to the groundwater conditions across the site (typically 4-10m). Refer to Section 5.1, Table 10 in the Stormwater Management Report.

11. Comment:

“In this regard we believe that the rural, green and spacious views and vistas of Meadowlily Road South and the environs of Meadowlily Woods Environmentally Significant Area and its surrounds ought to be protected and respected more or less as they are. It is an important part of our neighbourhood and community to retain its present conditions. The aerial views of this property at 101 Meadowlily from Google Earth or the city’s vegetation views shows that this property is already covered with 40-50% forest, hedgerows and valuable large and mature trees of an indigenous nature that perhaps should have been recommended to be added to the Environmentally Significant Area as a whole”

Response:

The vegetation communities within the subject property were delineated as part of the EIS, and are described in Section 4.3.1 of that document. A two-season vegetation inventory was also completed, as well as a tree inventory, which are detailed in Sections 4.3.2 and 4.3.3 of the EIS. 91% of the trees that were inventoried within the subject property are native (i.e. indigenous) species. Trees range in size from 10cm to 96.7cm DBH, with 3 larger trees as they have multiple stems.

The subject property is described in the EIS as “comprised primarily of a cultural meadow community as well as scattered trees around the house” (p. 1). The edge of the ESA’s significant woodland (5-10m) is located within the subject property, however the subject property is not covered with much forest.



The boundary of the ESA was recently reviewed through an extensive, multi-year project that included public consultation (NRSI 2019). The boundary review was undertaken using the City's Guideline Documents for Environmentally Significant Areas Identification, Evaluation and Boundary Delineation (1997), with a lot of back and forth with City staff and review by EEPAC. The ESA boundary was identified at 24.5m from the woodland edge within the subject property.

The ESA will be protected fully. Highbury Woods, within the ESA, is protected from the proposed development by a 35.5m buffer, which includes a 24.5m mantel within the ESA, as well as an 11m buffer from the ESA boundary. Additional best management practices are recommended in the EIS to avoid impact, such as fencing rear yards, dense vegetative plantings of native species, public education, monitoring, compensation for tree removal, and low impact development, among others.

As for the suggestion that 40-50% of the site is forest, hedgerows and valuable large and mature trees of an indigenous nature we offer the following. It should be first noted that the trees within the subject property, outside of Highbury Woods in no way constitute a "forest". The percentage of "treed areas" in the subject property, based on Map 3 of the EIS, is approximately 10.3% of the property area. This is based on the observed treed area of 0.53 ha as compared to the total site area of 5.15 ha. This measurement is fairly conservative and takes into account all of the hedgerows around the perimeter of the property, the edge of Highbury Woods, the cultural woodland around the residence as well as small stands of woody vegetation around the subject property. It also doesn't take into account the composition of these treed areas, with much of the vegetation around the residence (including the mature Norway Spruces which account for much of the tree cover in this area) being comprised on non-native vegetation. This property would have been considered for inclusion into the ESA during the preparation of the Meadowlily Woods ESA Conservation Master Plan; however, it does not meet the criteria described in Section 3.0 of the City of London's Environmental Management Guidelines to be included as a part of this feature. Additionally, analysis was undertaken as part of this EIS to determine if the woodland around the residence should qualify as a Significant Woodland, which it did not. This analysis is provided in Section 5.2 of the EIS as well as in Appendix XI.

12. Comment:

"The environmental polices of conservation master plans and the polices of the enhancement of ESAs suggests this as a normal course of treating and dealing with such areas so close to the Green Space Type (Paragraphs 757-74, especially Paragraphs 767-68 and 773) in the London Plan and open space and natural areas and corridors in the Official Plan. The large number of mature trees on the property and especially the large row right in the centre of the site are viewed by us as a significant environmental feature and ought to be treated as distinctive trees within a tree protection zone, which Meadowlily area is."



Response:

The “large row [of trees] right in the centre of the site” that is referred to is a hedgerow of Norway Spruce, a non-native species, but typical for farm lanes. The Norway Spruce range in size between 33.9 and 96.7cm DBH. Hedgerows, especially of non-native species, are generally not given special consideration from an environmental perspective, although tree removal is to be compensated for as per the City’s Tree Protection By-Law. As outlined in the 101 Meadowlily Road South Tree Protection Plan (NRSI 2019), the “compensation plantings, or total amount of cash contribution required will need to be approved by the City at the detailed design stage” (p. 6).

The entire subject property falls within the City’s Tree Protection Area (Schedule D-8) of the Tree Protection Bylaw, meaning that trees within the subject property do not qualify as ‘distinctive trees’. ‘Distinctive trees’ within the City of London are only identified outside of Tree Protection Areas.

The site has been designed to ensure that the natural heritage area will be protected and development and site alteration will only be permitted once the EIS has been reviewed and accepted by the City and the Ministry of Environment, Conservation and Parks. Where feasible, existing trees will be retained on site. A tree preservation plan has been undertaken. Portions of the subject site are located within an erosion hazard, and have been set back +/-11 metres with no development proposed within this boundary.

Landowner information packages with information regarding living adjacent to an Environmentally Significant Area will be distributed to all buyers of the dwelling units in the development. The information packages will encourage the property owners, through education, to contribute to the maintenance of the natural heritage system.

All the trees within the subject property, but outside of Highbury Woods, were inventoried by NRSI arborists. Of the 280 trees inventoried, 92 trees (32.9%) may be considered “mature” with a DBH of at least 20cm. 67 (23.9%) of the total number of trees are less than 15cm DBH.

Table 2 of the Tree Protection Plan (NRSI 2019) provides a summary of the overall health and condition of the trees within the subject property. 205 trees (73.2%) are in fair to excellent condition, with the remaining 75 (26.8%) being in poor or very poor condition (and 1 being dead).

13. Comment:

“Under Paragraph 1578, Section 6, Item K: “Loss of trees and canopy cover.” The loss of these trees and the large hedgerows and corridors of this site are a valuable part of the Meadowlily landscape and ought to be maintained and protected. We object to the removal of such a large environmental feature.



Section M of the same Paragraph (1578) says, "Impact on natural heritage features and areas." We see these trees as an important part of the natural components of Meadowlily Road South and our neighbourhood."

Response:

Tree removal is addressed in the EIS (NRSI 2020) and Tree Protection Plan (NRSI 2019) for the proposed development in accordance with the City's Environmental Management Guidelines (2007) and Tree Protection Bylaw, respectively. Trees from Highbury Woods are all retained, as are all trees within the ESA. In addition, trees around the perimeter of the subject property are also being retained. The trees to be removed for the proposed development are the hedgerow along the driveway to the footprint of the vacant house, as well as the scattered trees that are located around the footprint of the former residence.

As part of the submission package, a comprehensive landscape plan has been developed which will plant more trees and plants than what are to be removed. Under the planting plan, a total of 280 trees were inventoried on the site of a 4 inch at breast height. Of those 73 trees are to be retained and 207 trees are to be removed as part of the development. Upon the completion of the development, 209 trees are proposed to be planted to compensate those lost.

14. Comment:

"There are a host of other issues with this application as well: Given a front length in about 271 meters or so, think about the houses at the top of the hill from 171-135 Meadowlily Road South, given the size and proportion of these houses and lots, the proponent could build 8-10 single family dwellings in a similar manner and show respect for the community and the neighbours that will be a part of this area for years to come. That would show some sensitivity to the present situation and circumstances on our road."

Response:

As previously discussed, the London Plan and the PPS support and encourage residential intensification. The proposed development would redevelop the site for 89 dwelling units, well under the maximum density of over 200 units, which could have been developed on the site under the policies and provisions within the OP. We understand the desire of the neighbours to maintain the large, single detached lots within the area, however the need of the market is for standard sized, single detached dwellings and townhome style units. The suggestion of 8-10 single detached dwellings on the property is not feasible at this time. Both the PPS and OP support the intensification of infill residential uses on the property and every reasonable effort has been made to maintain some sensitivity to existing neighbours. The homes along Meadowlily Road South are proposed to be set back further than typically required to



maintain the views and sightlines as well as the setbacks and protection from the ESA boundary and Highbury Woods Park.

15. Comment:

"Also the Heritage Study for the application seems inadequate in terms of attention to detail around the pioneers and settlers that established this area not to mention the likelihood of First Nations' material that would likely be a part of looking deeper into that lot's history. One former neighbour says that there were likely longhouses on that site years ago. The Sumner Family has an extensive history in this area and it noted in the two-volume history of the Delaware-Westminster Township books (2006), especially Volume Two, Together in History, Pages 599-601. It is suggested that one of the ancestors of that family might have been the first settler on 101 Meadowlily Road! More attention needs to be given to the west side of the road not the east at Park Farm, which has numerous studies done."

Response:

A Heritage Impact Assessment (HIA) was requested by the Heritage Planner at the City of London to any potential effect of the proposed development on the properties at 10 and 120 Meadowlily Road South. The request is initiated under 13.2.3.1. of the Official Plan for the City of London, 1989. The London Plan restates the requirement for a HIA under Policy 565. These both state that where development occurs on adjacent land, the heritage values, attributes and integrity of the protected heritage property are retained. Adjacent lands include lands that are contiguous, and that are directly opposite a protected heritage property, separated only by a laneway or municipal road.

The subject site is not listed, designated on any registry or currently has any heritage attributes that would be required to be assessed under a Heritage Impact Assessment and thus only the neighbouring properties were analyzed as part of the report.

Through the Archaeological Impact Assessment, required as the site is located in an area deemed of high potential, as Stage 1 and 2 were conducted. In accordance with Section 1.3.1 of the Ministry of Tourism, Culture and Sport's (MTCS) 2011 Standards and Guidelines for Consultant Archaeologists (Government of Ontario 2011), the Stage 1 archaeological assessment of 101 Meadowlily Road has determined that the study area exhibits high potential for the identification and recovery of archaeological resources and a Stage 2 Archaeological Assessment is recommended.

The Stage 2 assessment was conducted on July 18th, 2019 under archaeological consulting license P344 issued to Derek Lincoln, MA, of LEC by the MTCS. No archaeological resources were identified during the Stage 2 archaeological assessment of the study area, and as such no further archaeological assessment of the property is recommended.



The two reports, were submitted to Ministry of Tourism, Culture and Sport as a condition of licensing in accordance with Part VI of the Ontario Heritage Act, R.S.O. 1990, c 0.18, and has been entered into the Ontario Public Register of Archaeological Reports.

16. Comment:

"We also object to the size and scale of this proposal of 84 condo units on the basis that this would constitute in all likelihood somewhere between 168-280 new residents on Meadowlily Road South with a commiserate amounts of vehicles given this population increase of between 336-560 vehicles on this road, which is much more like a rural or country road not designed or adequate to such a huge volume and increase in traffic and decrease in safety for cyclists and walkers who use this road for recreation and exercise. See Paragraph 1578 of the London Plan again for this, especially Page 410. The increase exceeds normal conditions and space requirements. In that regard it seems the project needs to be scaled back in order to provide enough on-site parking for that many vehicles and drivers. The visual impact of this plan has already been commented on above and the reduction of views of the Meadowlily area would be negatively affected by such an intensive plan."

Response:

As per the City of London's Transportation Impact Assessment Guidelines, dated April 2012, a TIA is required if the development proposal will add more than 100 peak-hour vehicle trips to the transportation system. Through the pre-consultation process, a Traffic Impact Assessment (TIA) is not typically required as less than 100 peak-hour vehicle trips will be generated from the proposed 89 dwelling units and it is well within acceptable limits of current road conditions. The applicant however, engaged Dillon Consulting Limited to complete a Transportation Impact Assessment Memo, provided under separate cover, which identified that the proposed development will generate less than the minimum threshold to require a full TIA, thus addressing Policy 1578.6 of the London Plan.

The subject site is also located within walking distance of an existing transit route and various commercial developments. As a result, an internal sidewalk network is proposed within the development. The applicant has also proposed a north/south multi-use pathway along the edge of the buffer lands that will connect the dwelling units to the natural heritage features abutting the subject site. The pathway will extend to Meadowlily Road South. The pathway will promote public access to recreation, parklands, open space areas and trails and linkages as encouraged in Section 1.5 of the PPS.



With regards to the parking concerns, the required parking for this type of development, under the zoning by-law is a minimum of 2 spaces (including in the driveway and garage) for both the single detached and townhome units. All lots/units provide the minimum number of 2 spaces with some lots providing up to 3 and 4 spaces, which is unmatched by any known new development in London with single car garage townhomes providing more than 2 spaces/unit. This generous parking space is 35% more than minimum required.

In addition to the private spaces within the driveways and garages, there are 10 additional proposed visitor parking spaces for the townhome blocks. These additional spaces can be used by any of the condominium visitors at any time and exceeds the required parking for the proposed development.

Any concerns with regards to the issues with parking along Meadowlily Road South currently will not increase due to the development. The proposed development, as indicated above, will provide ample parking for all units on site, within the individual garages and driveways as well as additional visitor parking, which is not currently required under the by-law to help to alleviate any neighbourhood concerns. The parking that is occurring along Meadowlily Road South today is from people wishing to access the Highbury Woods Park and the Meadowlily Road ESA. This is not as a result of the proposed development nor will it worsen once development occurs. In addition, there is a potential that once development is complete, many of the new residents, who may be currently accessing both natural features by parking on the road, will utilize their direct access and close proximity to the features without requiring their vehicles, thus reducing their need for parking on Meadowlily Road South.

17. Comment:

"Also under Paragraph 1578 it says in Section 7: That issues regarding Items C, D, F, G and J: Neighbourhood character, Streetscape character, height, density, massing, placement of building and setback and step-back (Page 410) from the road and closeness to the other property to the north or future development to the south are not consistent with or compatible with the context and landscape of Meadowlily Road South as a whole. These properties have a deeper setback, more open space and lawns that comprise the character and green space of this neighbourhood. The whole project ought to be scaled down to be more sensitive and consistent with the rest of the neighbourhood and landscape."

Response:

The applicant has designed the development to fit within the general characteristics of the neighbourhood by setting back the dwellings from Meadowlily Road South further than required under the zoning by-law as well as providing additional trees and buffering to respect the streetscape of the area. A natural screening (mature street trees) are proposed along Meadowlily Road South to maintain the current landscape



of the right-of-way. The proposed units, are not only permitted within the Neighbourhood Place Type designation but will meet most of the provisions of the R6-5\* zone as proposed.

It is important to understand that Policy 1578.7 indicates that "it must be clear that this not intended to mean that a proposed use must be the same as development in the surrounding context. Rather, it will need to be shown that the proposal is sensitive to, and compatible with, its context. It should be recognized that the context consists of existing development as well as the planning policy goals for the site and surrounding area." The applicant has increased the typical setbacks along Meadowlily Road South to allow for the property to develop within the parameters of the PPS, London Plan and Zoning By-Law while paying respect to the setbacks of the existing homes. The proposed 16 - 23 metre setbacks will allow for the larger vista-like views while allowing for development to occur.

Once again, on behalf of our clients, 2690015 Ontario Inc., we would like to thank you for providing comments with regards to the development proposal located at 101 Meadowlily Road South, in London, ON. We hope that the above responses to your concerns provide you with some comfort regarding the proposed development and the care that has been taken to design the development in such a way to be compatible with not only the existing homes in the area but also respecting Highbury Woods Park and Meadowlily Road ESA.

We believe that through the extensive studies conducted and the thorough review of the local and provincial policies in place, the proposed development is not only compatible but will ultimately help to enhance and protect the surrounding environment as well the character of the neighbourhood.

Should you have any question or concerns, please do not hesitate to contact the undersigned at (519) 948-4243, Ext. 3239.

Sincerely,

DILLON CONSULTING LIMITED

Melanie Muir, MCIP RPP  
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