



**Friends of Meadowlily Woods Community
Association
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**"Our Mission: To Preserve and Protect
the Integrity of Meadowlily Woods."**

City Clerk's Office

Attn: Heather Lysinski

Planning and Environment Committee

London City Hall

300 Dufferin Street

London, Ontario

Sunday September 27, 2020

Members of London Planning and Environment Committee,

We, the members of the Friends of Meadowlily Woods Community Association, would like to give comments and feedback regarding the development application, 39CD-20502; OZ9192, for a lot in our neighbourhood otherwise known by the address, 101 Meadowlily Road South. We have numerous concerns and issues with this plan that we would like to put forward to the Planning and Environment Committee as stated in the recently circulated notice of application via the city's website and in the public notices in the Londoner.

The first area of concern is with regard to the issue buffers and setbacks not for the area west or north of this site, but to the East, the part of the Meadowlily Woods Environmentally Significant Area on the other side of Meadowlily Road South itself. Meadowlily Road South is a narrow, small country road without sidewalks. We like it that way because it reflects the green and country-like landscape of our neighbourhood. With the applicant/owner wanting to build 37 small houses and 13 four-plexes to a rather small lot, that means in all

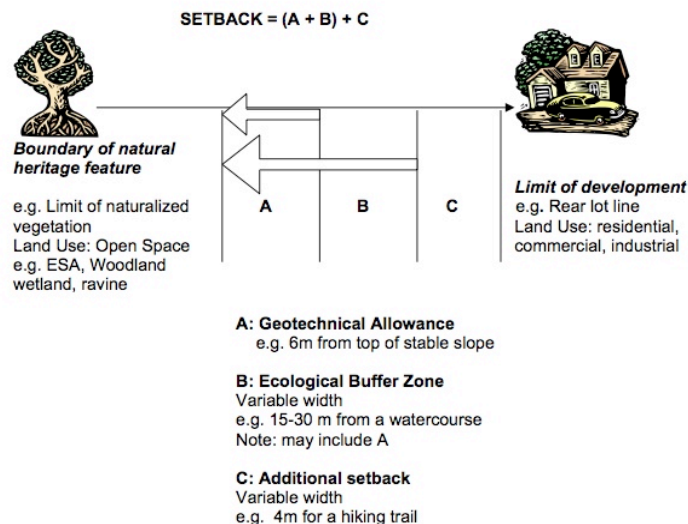
likelihood the impact on the significant woodland across the road would be very negative unless all of the allowed buffers and setbacks were taken into account and reflected in the plan for this site. In the city document entitled ***Guidelines for Determining Setbacks and Ecological Buffers*** from April 20, 2004 it states on Page 2:

Impacts generally expected from urban development can often be avoided or mitigated if a very broad area of land is maintained in an undeveloped state or as green space. This area of land, called a setback is defined as the physical distance separation measured from a rear lot line or edge of developed area to an identifiable natural heritage feature. Examples of natural features include, but are not limited to, Environmentally Significant Areas, woodlands, wetlands, river, stream and ravine corridors, watercourses, aquifers and ground water recharge areas.

It further states that:

The purpose of a setback is to separate two different land uses to minimize the impact of development on natural heritage features and functions, to protect individuals and property from natural hazards, and to control access and encroachment within adjacent natural areas. The ecological buffer is an important part of the setback (Figure 1).

Figure 1 : Schematic representation of buffers and setbacks



The main feature of Meadowlily Woods Environmentally Significant Area in this area is a sizable and valuable woodland area of large mature trees and hedges that form a buffer for the larger internal forest behind this feature. At one point in the Setbacks and Buffers Guidelines it also states on Page 13 what falls within these three zones, A, B and C:

- Zone A: ESA (environmentally significant areas) and potential ESAs
PSW (provincially significant wetland)
ANSI (areas of natural and scientific interest)
VTE (vulnerable, threatened, and endangered species)
- Zone B: Stream/ravine corridors (stream flood plain, valley wall, riparian vegetation, etc.)
Woodlands
LSW (locally significant wetland)
Fish habitat
Headwater recharge areas
Recharge and discharge areas
- Zone C: Upland corridors
Naturalization areas
Open space

And on Page 12 of the same document it gives the recommended buffers for these three zone features:

- NHS (natural heritage system) Feature (consider drip-line):
 - Zone A: 30m+
 - Zone B: 15-30m
 - Zone C: 2-15m

So it seems to us that such large-scale infrastructure like a sewer system would violate these sensitive areas and do harm to such an important and protected resource. In order to install and construct such a vast project would violate a buffer that in the one way of looking at these buffers: where with Zone A involving such distances as 30 metres for an environmentally significant area, pages 12-13 of this document or even the minimal distances of 10 meters from the drip line

of trees in significant woodlands (see Page 6 of this document for woodlands “10 m beyond the drip line of trees {protects the rooting zone’}— the front-door neighbour to this site for OZ-9192— would actually be on the other (west side) of the road given that many of the trees from the east side of Meadowlily Woods near Park Farm area overhang the east side of the road sometimes by an additional metre or more!



Aerial view of 101 Meadowlily Road South from Google Earth 2020

If you look carefully at this photo from Google satellite from earlier this year one can see that the trees on the east side of the road overhang the road area at numerous places and that a drip line from these trees plus 10 meters— the minimum buffer— would end up on the other side of Meadowlily Road South given that at many places the road itself isn't 10 metres wide but more like 8-9 metres in places. Any construction project the size of a sewer installation would violate these buffers and threaten the Meadowlily Woods Environmentally Significant Area on the east side of the road.

The origins of a lot of those trees in that woodland go back to a grove of sugar maple trees that were planted by the Fraser family when they first moved to Park Farm in 1909. This area is seen by the Friends of Meadowlily Woods Community Association as a heritage feature of this landscape not just a stand of trees. They deserve all the protection and conservation we can give to this area. Also given the quality and extent of this environmentally significant area has been given recently by studies by Natural Resource Solutions that did the environmental impact study for this site, it seems to be a significant weakness of their study that they did an additional letter attached to the study about buffers and could not see this limitation.

There is another element to this issue to setbacks and buffers that we'd like to address about this site and this proposal: in the same document the issue of creeks, streams and watercourses is discussed. Please note from the portions already quoted that these important features of such natural areas is also set out: from Page 2 again with emphasis on this issue—

This area of land, called a setback is defined as the physical distance separation measured from a rear lot line or edge of developed area to an identifiable natural heritage feature. Examples of natural features include, but are not limited to, Environmentally Significant Areas, woodlands, wetlands, river, stream and ravine corridors, **watercourses**, aquifers and ground water recharge areas. The purpose of a setback is to separate two different land uses to minimize the impact of development on natural heritage features and functions, to protect individuals and property from natural hazards, and to control access and encroachment within adjacent natural areas.

And from the other portions not noted thus far from Page 6:

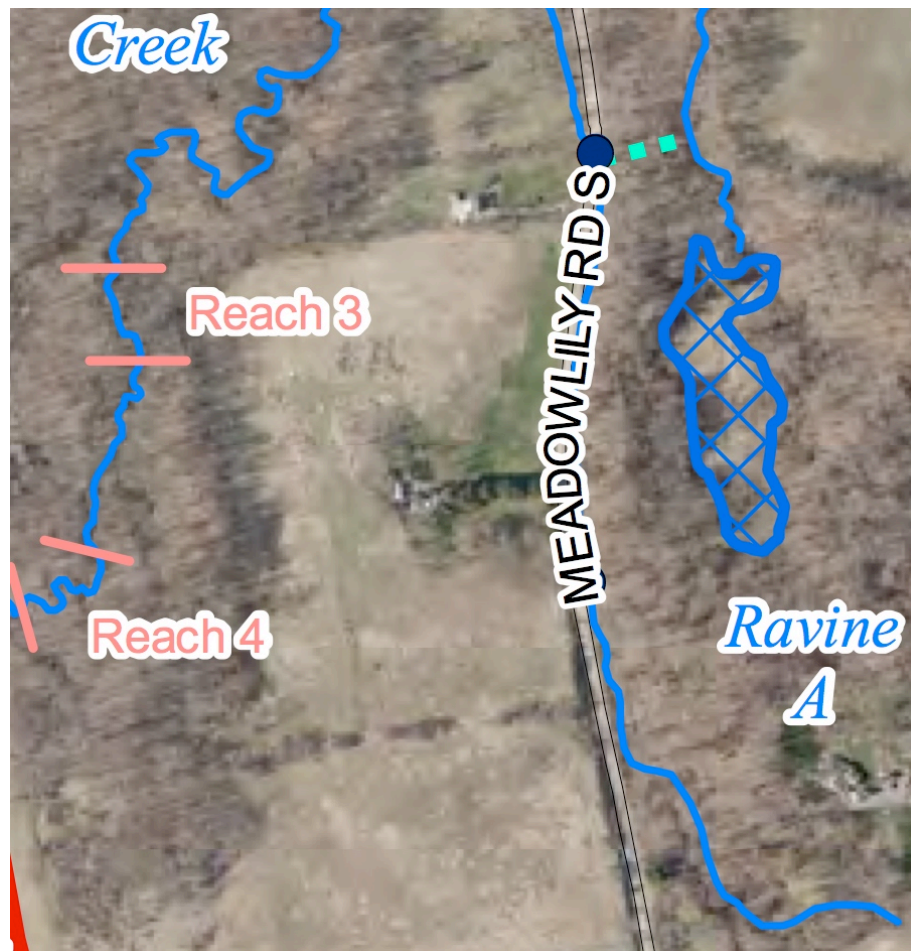
Watercourses

*Permanent: 30 m from the high water mark; or 30 m + 0.5 m per 1% of slope

*Intermittent: 15 m from high water mark; or 15 m + 0.5 m per 1% slope

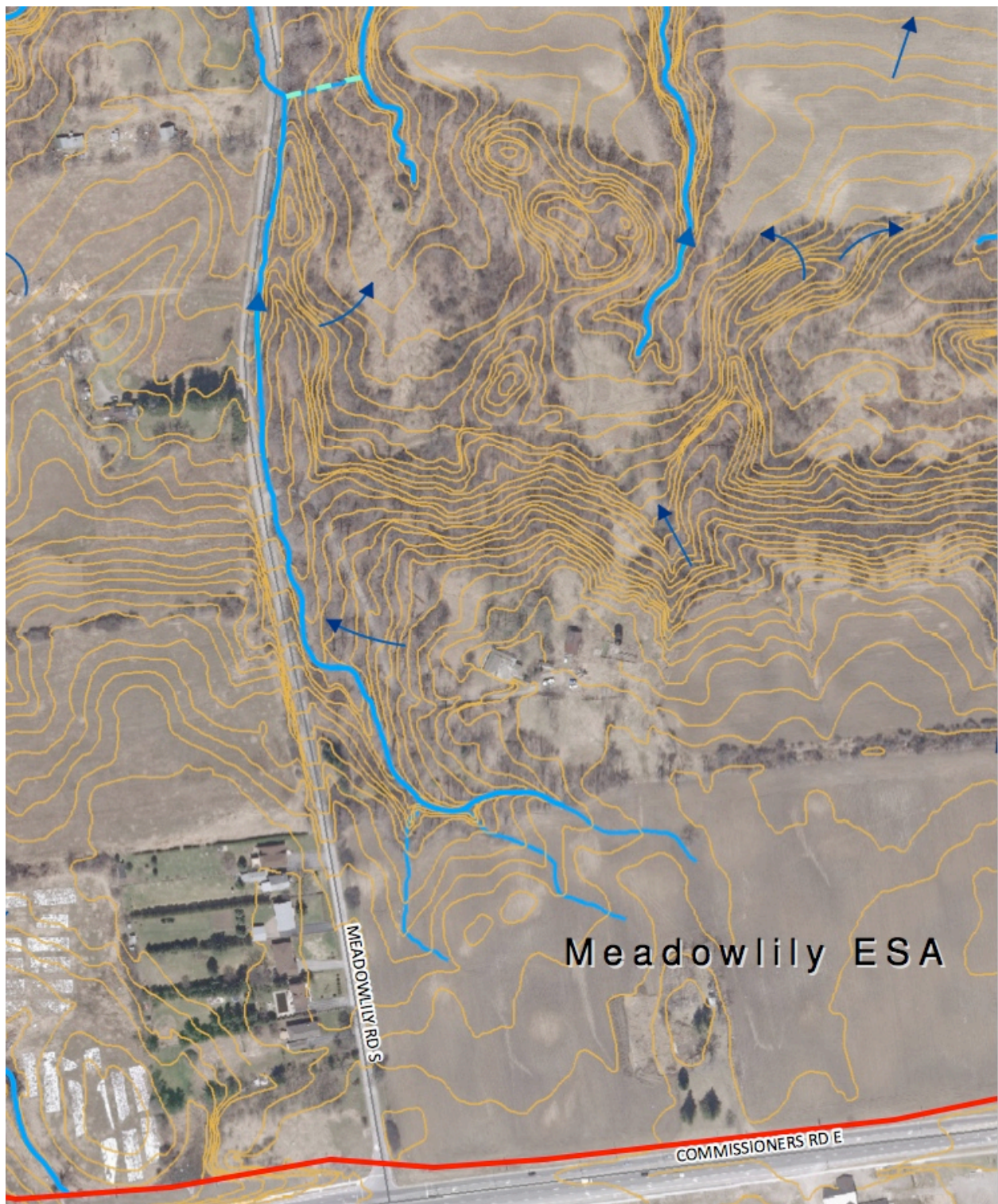
And to quote from Page 3 again Figure 1: "B: Ecological Buffer Zone Variable width e.g. 15-30 m from a watercourse."

There is such a watercourse in this area right along the same boundary of the Meadowlily Woods Environmentally Significant Area on the east side of Meadowlily Road South: a creek that starts in the three ravines just to the south of the Park Farm area and goes all the way down to the north until it reaches the Thames River. It is shown on Map 8 of the NRSI study for the Meadowlily Woods Conservation Master Plan:



And even more clearly from the 2011 Natural Heritage Study from

AECOM noted in the NRSI study as well:



AECOM Natural Heritage Study Map 2, watercourses

This creek has now been diverted to a culvert that runs along the east

side of the road but from Park Farm until enters the catch basin, it is still an open watercourse, a creek. It has overflowed that catch basin numerous times. It is a watercourse! It is just on the east side of Meadowlily Road South and according to this policy on setbacks and buffers deserves to have a 15-30 meter buffer which would go well into the lot at 101 Meadowlily Road South. An infrastructure project of such size as the construction of a sewer would seriously violate such a buffer-setback! This project of this size (89 condo units) does not belong here. What would work would be 10-16 single dwelling units like the ones at the top of the hill. This project needs to be seriously downsized and made to fit in with the existing houses and neighbourhood.

We already sent into the department dealing with this proposal, OZ-9192, that we have definite concerns and issues about the construction and installation of sanitary sewers for this site. Such a project would involve the digging and tearing up of our road might be involved in all of given that it was entirely rebuilt as of 2018-19. This project needs to be redesigned to be in context with the rest of the Meadowlily Road South area and neighbourhood.

We ask that this matter be rejected as it stands because of these various issues related to the buffers and setbacks normally related to Meadowlily Woods Environmentally Significant Area and the creek that runs along the east side of Meadowlily Road South. This plan needs to be downsized to be more in proportion to the neighbourhood and community around it.

Respectfully Submitted,

Gary Smith
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