

March 31, 2021



Development Services  
City of London  
300 Dufferin Avenue  
London, ON  
N6A 2L9

**Attention:** **Larry Mottram, Senior Planner, Development Services & Bruce Page, Manager, Development Services**

Our File #: 12-824

**Reference:** **Sifton Properties Limited  
Responses to City of London and Upper Thames River Conservation Authority  
Comments Regarding the Proposed Caverhill Subdivision (File #TS2017-004)  
Official Plan & Zoning By-law Amendment and Draft Plan of Subdivision  
2331 Kilally Road and 1588 Clarke Road**

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**Monteith Brown Planning Consultants** (“MBPC”), on behalf of our client, **Sifton Properties Limited** (‘Sifton’) and in partnership with **AECOM**, is pleased to submit our response to comments received from the City of London, the Upper Thames River Conservation Authority (‘UTRCA’), the City of London Environmental and Ecological Planning Advisory Committee (‘EEPAC’), and members of the public for the proposed ‘Caverhill’ development at 2331 Kilally Road and 1588 Clarke Road (“the subject lands”). MBPC submitted applications on behalf of our client for amendments to the City of London 1989 Official Plan and the City of London Zoning By-law Z.-1 and Draft Plan of Subdivision approval for the subject lands in June 2020.

The intent of this letter is to respond to questions and comments from the following City departments and commenting agencies:

- Development Services, City of London;
- Stormwater Engineering and Design, City of London;
- Environmental and Ecological Planning Advisory Committee, City of London;
- Upper Thames River Conservation Authority;
- as well as members of the public.

A revised Draft Plan of Subdivision, Official Plan Amendment sketch, and Zoning By-law Amendment sketch are enclosed with this submission for the City’s review and comment, in advance of a Planning and Environment Committee meeting to consider the applications. We are looking forward to working with the City to move the applications forward to ensure our client obtains timely approvals for the proposed Draft Plan, Official Plan Amendment, and Zoning By-law Amendment.

## SUBDIVISION DESIGN CHANGES

In response to comments received from the City of London and the UTRCA and internal discussions on how to optimize the site design, Sifton has made the following major changes to the proposed Draft Plan of Subdivision:

1. The subdivision's internal road network has been redesigned to relocate the southern access from the UTRCA-owned lands to the City-owned road allowance, as the UTRCA has indicated they are not supportive of a road connection onto their lands;
2. The northern entrance to the subdivision has been brought closer to the western property line, to allow for the placement of a parkland block on the northeast side of the site;
3. The low-density portion of the subdivision are shown as 'blocks' rather than lots. Lots may be created through the part-lot control process at a later date, to allow our client the flexibility to respond to shifts in market demand;
4. The proposed SWM block has shifted slightly to the west, and now extends to the western property line, with the proposed location generally aligning with the proposed location for the SWM block shown in the Kilally South, East Basin EA;
5. The proposed Thames Valley Parkway extension (TVP) has been removed from the ESA buffer area, and now runs along the proposed Street 'C' to avoid impacts on environmentally-sensitive areas;
6. The 15-metre parkland access block to the north of Street 'C' has been removed and absorbed into Block 2;
7. The proposed TVP extension now exits the subdivision at Clarke Road, rather than continuing onto UTRCA lands. It is expected that the UTRCA will be responsible for designing a TVP connection onto their property, to connect with the Fanshawe Conservation Area trails.

As a result of these revisions, the Draft Plan block sizes and numbering have changed from the previous submission, as identified in red on the list below:

- ~~Lots 1 to 164~~ **Blocks 1 to 16: Low-Density Residential, 7.98 Ha 9.53 Ha**
- ~~Blocks 165 to 174~~ **17 to 21: Medium-Density Residential, 10.9 Ha 8.42 Ha**
- ~~Blocks 172 to 174~~ **22 to 24: Open Space – Parkland, 1.37 Ha 1.25 Ha**
- ~~Blocks 175 & 176~~ **25 & 26: Open Space – Sanitary Pump Station and SWM Pond, 1.38 Ha 1.28 Ha;**
- **Blocks 27 & 28: Road Reserves, 0.23 Ha;**
- **Streets A to E: 4.76 Ha**
- ~~Block 177~~ **29: Open Space, ESA Buffer, 0.71 Ha 0.91 Ha**
- ~~Block 178~~ **30: Open Space, ESA, 1.44 Ha**
- ~~Streets A to D & Block 179 (VMP Extension): 4.06 Ha~~

The Official Plan and Zoning By-law Amendment sketches have also been updated to reflect the proposed changes to the Draft Plan of Subdivision, and a Parkland sketch has been provided to show the proposed parkland, ESA and ESA buffer land, and the proposed SWM pond area.

## CITY OF LONDON COMMENTS

### *City of London Stormwater Engineering and Design*

The Hydrogeological Assessment Report prepared by AECOM has been updated to include data from new monitoring wells that were installed across the site in 2018, as well as comments on the Kilally South, East Basin Environmental Assessment report that was completed by Blumetric. A copy of the updated Hydrogeological Assessment Report is enclosed with this submission.

### *City of London Development Services*

The City's Ecological Planner has provided comments on the EIS prepared by AECOM in 2020 for the proposed subdivision, primarily addressing the proposed buffer, trail placement, and study methodology. Detailed responses to each comment are provided in the enclosed table, as well as an addendum to the EIS prepared by AECOM with more information on ecological buffers, management of parkland blocks, the

alignment of the multi-use trail, and infill planting. It is anticipated that a final EIS addressing the comments provided by the City of London Development Services will be included as a condition of Draft Plan approval. *Environmental and Ecological Planning Advisory Committee Comments*

EEPAC provided general comments and recommendations regarding the Environmental Impact Study prepared by AECOM to Sifton in September 2020. A detailed response from AECOM is enclosed with this submission, with the main issues addressed in brief in this letter.

Although EEPAC was concerned that the EIS did not reference the Kilally South, East Basin EIS and the Clarke Road Bridge EA, AECOM noted that the EIS prepared by North-South Environmental as part of the Kilally South, East Basin Municipal Class EA was not complete until September 2020, **after** the AECOM EIS was completed in March 2020. Notwithstanding, AECOM will prepare an updated EIS for the subject lands incorporating information from both studies.

EEPAC made several recommendations for how the EIS could be updated to address their comments and concerns. Brief responses to each recommendation are provided below, with more detail shown on the attached spreadsheet.

1. AECOM has clarified the recommended buffers and provided rationale for the buffer widths in the enclosed addendum. The buffers are predominantly 20 metres or more from the proposed ESA boundary (with the only exception of a small stretch in the southeast portion of the subject lands).
2. An Edge Management Plan can be part of implementation recommendations for detailed design.
3. It is noted that a permit from MECP will be required for the removal of barn swallow habitat.
4. It is noted that a UTRCA forester and UTRCA biologist should be consulting re: removal of barn swallow habitat.
5. It is noted that any change in land use must have a holding provision that requires a detailed environmental management plan that is produced in conjunction with the City plans for the SWM project which will proceed the development.
6. AECOM will review and consider the location of nesting structures in relation to foraging habitat.
7. It is agreed that any nesting structures must have capacity for a minimum of 20 nests.
8. The Environmental Monitoring Program/Plan will include monitoring of barn swallow structures.
9. AECOM will recommend the installation of signage for barn swallow structures to decrease disturbance and provide education
10. AECOM will consider including recommendations to rehabilitate the areas where an existing informal trail has resulted in compacted soils.
11. A requirement that all properties adjacent to the ESA buffer and setback be fenced without gates will be included as a condition of Site Plan Approval.
12. It is agreed that Homeowner's Packages should include a copy of the City's 'Living with Natural Areas' brochure.
13. AECOM has noted EEPAC's recommendation that if the City has not amended the delineation of the Kilally Forest ESA, it should be part of the change in land use and zoning related to this application
14. AECOM noted that EEPAC's request to be circulated on the proposed environmental management plan is at the discretion of the City of London.
15. AECOM agreed that the study design for monitoring be reviewed by the City and UTRCA as a condition of the development agreement.
16. AECOM will review the recommendations for lighting and noise impacts and clarify what the recommendations will be based on.
17. It is agreed that bird-friendly glass materials be used for homes along the ESA side of the development.
18. A direct entrance to the proposed subdivision from Clarke Road (versus Kilally Road) is not possible because the property does not have frontage on Clarke Road.
19. The EIS will be updated to address any potential impacts from the temporary pumping station at the northwest corner of the site.

## UTRCA COMMENTS

UTRCA staff have provided comments on a number of studies submitted with this application, as well as comments reflecting their position as the owner of lands directly adjacent to the proposed Draft Plan of Subdivision. MBPC has coordinated with other members of the project team to provide responses to the comments on the technical studies and would also be pleased to coordinate a meeting with the UTRCA, as a landowner, to address any remaining concerns.

### *Environmental Impact Study*

Detailed responses to the UTRCA's comments on the Kilally South, East Basin SWM Servicing Strategy, methodology, the proposed buffer and pathway, and indirect impacts of the proposed development are provided by AECOM in the enclosed table and EIS addendum.

### *Geotechnical/Slope Assessment*

Our client has engaged Peto MacCallum Ltd. ('PML') to respond to the UTRCA's comments pertaining to the Slope Stability Assessment, and their response will also be provided to the City and the UTRCA once complete.

### *Hydrogeological Assessment & Water Balance Analysis*

AECOM has updated the Hydrogeological Assessment to address the UTRCA's high-level comments.

### *Traffic Impact Assessment*

Our client has engaged Paradigm Transportation Solutions Limited ('Paradigm') to update the Traffic Impact Assessment ('TIA') that was originally completed in July 2018 for the proposed subdivision, and this report will be submitted to the City once complete.

## MEMBERS OF THE PUBLIC

The City has forwarded public comments from four people regarding the proposed application, who have questions regarding the Heritage Impact Assessment; the northern and southern access points; development timing; and impacts to the nearby active dairy farm. MBPC has provided responses to these comments in the attached table.

### Summary

In support of this submission, please find enclosed:

- One (1) copy of a revised Draft Plan of Subdivision;
- One (1) digital CAD file of the Draft Plan tied to UTM coordinates;
- One (1) copy of a revised Official Plan Amendment Sketch;
- One (1) copy of a revised Zoning By-law Amendment Sketch;
- One (1) copy of a Parkland Sketch;
- One (1) copy of an Environmental Impact Study Addendum and revised Figure 8 prepared by AECOM;
- One (1) copy of a revised Hydrogeological Assessment Report (2021) prepared by AECOM;
- One (1) copy of a letter prepared by AECOM regarding public comments on the Heritage Impact Assessment; and
- One (1) copy of tables prepared by MBPC and AECOM with comprehensive responses to comments received thus far from the City of London, UTRCA, EEPAC, and members of the public.

We trust that the enclosed information is satisfactory to address the City, EEPAC, and UTRCA's comments at this time, and would be pleased to coordinate separate meetings with the City and the UTRCA (as an adjacent landowner) to review the revised Draft Plan. If you have any questions regarding this matter or require any additional information, please do not hesitate to contact me. We look forward to working with staff to continue to advance this application.

Respectfully submitted,

**MONTEITH BROWN PLANNING CONSULTANTS**



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