



**Stantec Consulting Ltd.**  
600-171 Queens Avenue, London ON N6A 5J7

September 15, 2022  
File: 161403241

**Attention: Mr. Matt Feldberg**  
Development Services, City Hall  
300 Dufferin Avenue  
London ON N6A 4L9

Dear Matt,

**Reference: Colonel Talbot East Subdivision – Assessment of Need for an EA**

Further to the proposal review meeting held April 13, 2022, this letter shall serve to evaluate the Municipal Class Environmental Assessment requirements for the Colonel Talbot East Subdivision located at 3924 Colonel Talbot Road, in London ON.

The following provisions of services to be constructed by Auburn Developments are subject to the above noted condition.

- A. The extension and construction of a local road (Savoy Street) which is required to provide access to the proposed Subdivision as condition of approval for the plan of subdivision, which will come into effect under the Planning Act prior to the construction of the road extension.
- B. The construction of a sanitary sewer extension to serve this development. The sanitary sewer will be connected to the existing sanitary trunk sewer just south of the site limits, located at Savoy Street, near the intersection of Bakerville Street. Connection to this outlet will require the construction of sewers over lands external to this plan, located within future Savoy Street Extension at Foxwood Crossing Subdivision
- C. The construction of storm sewers to serve this plan, outletting to the existing City owned Lambeth Meadows - Pond 1 Cell 2 SWM dry Facility via internal storm sewer servicing for this plan of subdivision and the existing storm sewer on Bakerville Street and overland flow routes of the Foxwood Crossing Subdivision. Connection to this outlet will require the construction of sewers over lands external to this plan, located within future Savoy Street Extension at Foxwood Crossing Subdivision.
- D. The construction of stormwater quality control measures for subject subdivision post-development stormwater quality improvement to downstream Lambeth Meadows – Pond 1 Cell 2 SWM dry Facility.
- E. The construction of a watermain to serve this plan and connect them to the existing low-level municipal system. The watermain to serve this plan will be extended from the existing water main located at the intersection of Savoy Street and Bakerville Street to the north and shall be terminated immediately after the water service to lot 1. Connection at Savoy

**Design with community in mind**



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Street will require the construction of watermain over lands external to this plan, located within future Savoy Street Extension at Foxwood Crossing Subdivision

Ontario Regulation 345/93, made under the EA Act, designates private sector developers as proponents of infrastructure projects, however, provides exemptions to such developers to undertake the infrastructure work unless **a private sector developer is proposing an undertaking listed in Schedule C** and the undertaking listed in Schedule C involves the provision of roads, water or wastewater facilities for the residents of a municipality. Using the accepted interpretation that private sector developers are exempt from the EA Act except when projects are listed under Schedule C for residential developments, it is our opinion that Auburn Developments acting as the proponent for the provision of services noted above, being items A through E, would not be subject to the requirements for a Class Environmental Assessment since the aforementioned works would not qualify as Schedule C activities. In our opinion the implementation of these services are considered either **Schedule A or B activities**, in accordance with the following MEA guidelines:

- 1) MEA guideline document page 1-11 item 10,

*"Establish, extend or enlarge a sewage collection system and all works necessary to connect the system to an existing sewage outlet, where it is a condition of approval on a site plan, consent plan, or plan of subdivision or plan of condominium, which will come into effect under the Planning Act prior to the construction of the collection system" and*

- 2) MEA guideline document page 1-15 item 1,

*"Establish, extend or enlarge a sewage collection system and all works necessary to connect the system to an existing sewage outlet, where such facilities are not in an existing road allowance of an existing utility corridor" and*

- 3) MEA guideline document page 1-14 item 5,

*"Modify, retrofit, or improve a retention/detention facility including outfall or infiltration system for purpose of stormwater quality control. Biological treatment through the establishment of constructed wetlands is permitted." and*

- 4) MEA guideline document page 1-14 item 1,

*"Establish, extend or enlarge a water distribution system and all works necessary to connect the system to an existing system or water service, provided all such facilities are in either an existing road allowance or an existing utility corridor, including the use of Trenchless Technology for water crossings." and*



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- 5) MEA guideline document page 1-13 item 6,

*“Establish, extend or enlarge water distribution system and all works necessary to connect the system to an existing system, where it is a condition of approval on a site plan, consent plan, or plan of subdivision or plan of condominium, which will come into effect under the Planning Act prior to the construction of the collection system” and*

- 6) MEA guideline document page 1-5 item 23,

*“Construction of local roads which are required as condition of approval of a site plan, consent, plan of subdivision or plan of condominium which will come into effect under the Planning Act prior to the construction of the road”.*

Furthermore, as the Colonel Talbot East Subdivision is being developed under the Draft Plan of Subdivision Approval process of the Planning Act, it is our opinion that an Environmental Assessment under the Class EA requirements is not required by Auburn Developments for this development. We trust this adequately addresses the aforementioned requirement. Should you have any questions or concerns please contact the undersigned.

Sincerely,

**STANTEC CONSULTING LTD.**

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Development

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