Report to Planning and Environment Committee

To: **Chair and Members**
Planning and Environment Committee
From: **Scott Mathers, MPA, P. Eng.**
Deputy City Manager, Planning and Economic Development
Subject: **Corlon Properties Inc.**
465 Sunningdale Road West
File Number: OZ-9623, Ward 7
Public Participation Meeting
Date: **August 26, 2024**

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of Coron Properties Inc. relating to the property located at 465 Sunningdale Road West:

(a) the proposed by-law attached hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting on September 24, 2024 to amend the Official Plan, The London Plan to:

i) REVISE Map 1 – Place Types - to redesignate portions of the subject lands **FROM** Green Space and Neighbourhoods Place Types **TO** Neighbourhoods and Green Space Place Types;

ii) REVISE Map 3 – Street Classifications - to **ADD** Neighbourhood Connector Street Classifications;

iii) REVISE MAP 7 – Specific Policy Areas – to **ADD** a Specific Policy to the Neighbourhoods Place Type to permit low-rise apartment buildings (4 storeys maximum) with frontage on a Neighbourhood Connector street classification;

(b) the proposed by-law attached hereto as Appendix "B" **BE INTRODUCED** at the Municipal Council meeting on September 24, 2024 to amend Zoning By-law No. Z.-1, in conformity with the Official Plan, The London Plan as amended in part (a) above, to change the zoning of the subject lands **FROM** an Open Space OS1 Zone, an Environmental Review ER Zone, and an Open Space OS5 Zone **TO** a Residential R1 Special Provision (R1-9(*)) Zone; a Residential R1 Special Provision (R1-9(**)) Zone; a Residential R1 Special Provision/Neighbourhood Facility/Community Facility (R1-9(*)/NF/CF1)) Zone; a Residential R5 Special Provision (R5-3( )) Zone; a Residential R5 Special Provision/Residential R9 Special Provision (R5-4(*)/R9-4(*)) Zone; a Residential R5 Special Provision/Residential R9 Special Provision (R5-4(**)/R9-4(***)) Zone; a Residential R5 Special Provision/Residential R9 Special Provision (R5-6(*)/R9-4(**)) Zone; a Residential R5 Special Provision (R5-6(**)) Zone; a Residential R5 Special Provision (R5-6(***)) Zone; a Residential R9 Special Provision (R9-7( )) Zone; an Open Space OS1 Zone; and an Open Space OS5 Zone;

(c) The Planning and Environment Committee **REPORT TO** the Approval Authority the issues, if any, raised through the application review process for the property located at 465 Sunningdale Road West;

(d) The Approval Authority **BE ADVISED** that Municipal Council supports issuing draft approval of the proposed plan of residential subdivision, subject to draft plan conditions recommended by the Approval Authority, as submitted by Corlon Properties Inc., prepared by LDS (Drawing No. 00143-Draft_Plan (230306).dwg), certified by Jake Surgenor O.L.S., dated March 6, 2023, **as red-line amended,** which shows 156 single detached residential lots, 1 future residential/public road access block, 1 school block, 6 multi-family residential blocks, 1 multi-family

residential/mixed use block, 4 blocks for neighbourhood park and multi-use pathways, 1 open space block for the reconstructed Axford Drain corridor, 1 road widening block, 6 reserve blocks, served by 8 public roads (File No. 39T-23503).

IT BEING NOTED, that the above noted amendments are being recommended for the following reasons:

i. The recommended amendments are consistent with the *Provincial Policy Statement 2020* which promote densities that efficiently use land, resources, and infrastructure, and neighbourhoods that foster social interaction, facilitate active transportation and community connectivity.
ii. The recommended amendments conform to the policies of *The London Plan*, including, but not limited to, the Neighbourhoods Place Type, City Building and Design, Environmental, Our Tools, and all other applicable policies of *The London Plan*.
iii. The recommended amendments are appropriate and compatible with existing and future land uses surrounding the subject lands.
iv. The recommended zoning will support the proposed Draft Plan of Subdivision and facilitate an appropriate form, height, and mix of residential development in conformity with *The London Plan,* as amended.

Executive Summary

Summary of Request

The request is to amend the Official Plan, The London Plan and Zoning By-law Z.-1 to facilitate the development of a residential plan of subdivision consisting of single detached dwellings, multiple-attached dwellings including townhouses, low-rise apartment and mixed-use buildings, neighbourhood facilities, parks, open spaces, multi-use pathways, stormwater management facilities, and a reconstructed/realigned drain corridor; served by eight (8) public streets.

Purpose and Effect of Recommended Action

The purpose and effect of the recommended action is for Municipal Council to approve the recommended Official Plan and Zoning By-law Amendments to permit the range of uses, intensity and form associated with the applicant's proposed draft plan of subdivision application. The amendments and proposed draft plan of subdivision will add approximately **1,360 new residential dwelling units** in the City of London.

Linkage to the Corporate Strategic Plan

This recommendation will contribute to the advancement of Municipal Council's 2023-2027 Strategic Plan in the following ways:

Housing and Homelessness - A well planned and growing community.

Wellbeing and Safety – London has safe, vibrant, and healthy neighbourhoods and communities.

Analysis

1.0 Background Information

1.1 Previous Reports Related to this Matter

July 22, 2019 – Report to Planning and Environment Committee – Application by Sunningdale Golf and Country Club Ltd. for approval of Draft Plan of Subdivision and Zoning By-law Amendments - 600 Sunningdale Road West (File No. 39T-18501/Z-8888).

1.2 Planning History

On July 30, 2019, Municipal Council adopted Zoning By-law Amendments in conjunction with a proposed Draft Plan of Subdivision submitted by Sunningdale Golf and Country Club

Ltd. for lands consisting of approximately 20.6 hectares on the south side of Sunningdale Road West, between Richmond Street and Wonderland Road North. On October 11, 2019, the City of London Approval Authority issued Draft-Approval of the subdivision plan. Phase 1 of the draft plan, consisting of 42 single detached lots, 3 Open Space blocks, 1 road widening block and 4 reserve blocks served by Creekview Chase and Robbie's Way, was granted final approval by the Approval Authority on September 22, 2022 and is registered as Plan 33M-827. A three-year extension of the remaining lands within the draft-approved plan was granted by the Approval Authority on March 2, 2023.

1.3 Property Description and Location

The subject lands for this Official Plan and Zoning By-law amendment is a 51 hectare site with a large portion consisting of an existing golf course property located at 465 Sunningdale Road West. The site is bounded by Sunningdale Road West on the south, Wonderland Road North on the west, the City of London boundary with the Municipality of Middlesex Centre on the north, and the remaining golf course lands and facilities owned by Sunningdale Golf and Country Club Ltd. on the east. The site is also bounded by the City's Urban Growth Boundary formed by Wonderland Road North and the east-west municipal boundary and current City Limits. An existing Sun-Canadian oil pipeline easement also runs along the municipal boundary just inside the northerly limits.

Approximately 150 metres in from Wonderland Road West is a strip of land surplus to the existing golf course operations consisting mostly of cultivated fields. Further east is the landscaped and manicured golf course characterized by gently rolling topography, mature stands of trees lining the golf course fairways, and a man-made irrigation pond at the far north end of the site which will eventually be filled in. An intermittent watercourse and series of ponds known as the Axford Drain crosses Wonderland Road North and extends in a southeasterly direction across the golf course lands to a culvert crossing under Sunningdale Road West, continuing south and eventually making its way to the Medway Creek and Medway Valley Heritage Forest ESA. A re-alignment and reconstruction of the Axford Drain is proposed to be incorporated as a complete corridor and open space feature as part of the subdivision development.

Located within a suburban setting on the edge of the City's built area boundary, the surrounding land uses consists mostly of open space, agriculture, and residential neighbourhoods. Large portions of the area are still developing and there are multiple approved developments in the vicinity of the site. The residential development to the south and east are part of the earlier phases of Corlon's "Neighbourhoods of Sunningdale" development.

Site Statistics:

- Current Land Use – private golf course
- Frontage – approx. 990 metres on Sunningdale Road West and 695 metres on Wonderland Road North
- Area – 51.07 hectares
- Shape – irregular

Surrounding Land Uses:

- North – agriculture/field crops and oil pipeline easement
- East – private golf course
- South – residential single detached homes and open space
- West – agriculture/field crops

Existing Planning Information

- The London Plan Place Type – "Neighbourhoods" and "Green Space"
- Existing Zoning – Open Space (OS1 & OS5) and Environmental Review ER

1.4 Location Map

2.0 Discussion and Considerations

2.1 Development Proposal

The Official Plan and Zoning Amendment will facilitate development of a residential plan of subdivision consisting of single detached dwellings, multiple-attached dwellings including townhouses, low-rise apartment and mixed-use buildings, an elementary/secondary school block, a neighbourhood park connected to multi-use pathways and open space linkages, stormwater management facilities, and a reconstructed/realigned municipal drain corridor; all served by eight (8) public streets.

The proposed subdivision consists of 156 single detached residential lots, one (1) future residential/public road access block, one (1) school block, six (6) multi-family residential blocks, one (1) multi-family residential/mixed use block, four (4) blocks for neighbourhood park and multi-use pathways, one (1) open space block for the reconstructed/realigned Axford Drain corridor and two (2) associated dry pond SWM facilities, all served by eight (8) public roads. Estimated total yield of residential dwelling units is 1,360 (156 single detached lots, 356 cluster townhouse units, and 848 low-rise apartment units). In addition, there will be opportunities for neighbourhood commercial/retail uses (approx. 1400 m²) on the ground floor within mixed-use buildings oriented to the intersection of Sunningdale Road West and Wonderland Road North.

2.2 Requested Amendments

Requested Official Plan, The London Plan Amendments

Map 1 – Place Types to change the designation on a portion of the property from the Green Space Place Type to the Neighbourhoods Place Type to permit a range of uses including single detached, semi-detached, and duplex dwellings, triplexes, fourplexes, townhouses, stacked townhouses, low-rise apartments, mixed-use buildings, community facilities, and stand-alone retail, service and office uses. The Neighbourhoods Place Type would be applied to all residential lots/blocks, the school block, and all public road rights-of-way. The Green Space Place Type would be applied to all parkland and open space blocks as shown on the proposed draft plan of subdivision.

Map 7 - Specific Policy Areas to add a specific policy for the Neighbourhood Place Type to permit low-rise apartment buildings (4 storeys max.) on Block 159 which will have frontage on a Neighbourhood Connector (Street “L” as shown on the draft plan).

City Staff have included an amendment to Map 3 – Street Classifications to add the Neighbourhood Connector street classifications to correspond with the Neighbourhood Connector roads in the proposed subdivision draft plan.

Requested Zoning Amendments

An amendment to Zoning By-law Z.-1 is required to change the zoning from an Open Space OS1 Zone, Environmental Review ER Zone, and Open Space OS5 Zone to the following zones:

- **Lots 1 – 156 and Block 164:** a Residential R1 Special Provision (R1-9( )) Zone to permit single detached dwellings on lots with a minimum lot area of 690 square metres and minimum lot frontage of 18 metres, together with a special provision for an interior side yard for main dwelling of 1.2 metres, except where no private garage is attached to the dwelling, one yard shall be 3.0 metres.

- **Block 157 –** a Residential R5 Special Provision (R5-3( )) Zone to permit townhouses and stacked townhouses up to a maximum density of 35 units per hectare, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 3.0 metres (north), 3.0 metres (west), 1.5 metres (south), and 1.0 metre for every 1.0 metres of main building height (east), maximum height of 1 to 3 storeys,

front face and primary entrance of all dwellings adjacent a public street shall be oriented to the public street, and townhouse blocks shall be a maximum of 8 units in length.

- **Block 158 –** a Residential R5 Special Provision (R5-4( )) Zone to permit townhouses and stacked townhouses up to a maximum density of 40 units per hectare, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 3.0 metre (north), 3.0 metres (maximum 8.0 metres) (west), 3.0 metres (maximum 8.0 metres) (south), and 1.0 metre for every 1.0 metres of main building height (east), minimum landscaped open space of 30%, maximum lot coverage of 30%, maximum height of 2 to 4 storeys, no parking or drive aisles shall be located between a building and the adjacent street line, and where more than one building is developed, the maximum yard depths shall only apply to the building nearest the lot line shared with the street; and, a Residential R9 Special Provision (R9-4( )) Zone to permit such uses as apartment buildings and senior citizens apartment buildings, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 3.0 metres (north), 3.0 metres (maximum 8.0 metres) (west), 3.0 metres (maximum 8.0 metres) (south), and 1.0 metre for every 1.0 metres of main building height (east), maximum height of 2 to 4 storeys, maximum density of 120 units per hectare, no parking or drive aisles shall be located between a building and the adjacent street line, and where more than one building is developed, the maximum yard depths shall only apply to the building nearest the lot line shared with the street.

- **Block 159 –** a Residential R5 Special Provision (R5-6( )) Zone - to permit townhouses and stacked townhouses up to a maximum density of 50 units per hectare, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 1.2 metres (north), 6.0 metres (west), 3.0 metres (southwest), and 6.0 metres (southeast), minimum landscaped open space of 30%, maximum lot coverage of 30%, maximum height of 1 to 4 storeys, front face and primary entrance of all dwellings adjacent a public street shall be oriented to the public street, and townhouse blocks shall be a maximum of 8 units in length; and, a Residential R9 Special Provision (R9-4( )) Zone to permit such uses as apartment buildings and senior citizens apartment buildings up to a maximum density of 115 units per hectare, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 1.2 metres (north), 6.0 metres (west), 3.0 metres (southwest), and 6.0 metres (southeast), maximum height of 1 to 4 storeys, front face and primary entrance of all dwellings adjacent a public street shall be oriented to the public street, and townhouse blocks shall be a maximum of 8 units in length.

- **Block 160** - a Residential R5 Special Provision (R5-4( )) Zone to permit townhouses and stacked townhouses up to a maximum density of 40 units per hectare, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 1.0 metre for every 1.0 metres of main building height (north), 3.0 metres (maximum 8.0 metres) (west), 3.0 metres (maximum 8.0 metres) (south), and 3.0 metres (east), minimum landscaped open space of 30%, maximum lot coverage of 30%, maximum height of 2 to 4 storeys, no parking or drive aisles shall be located between a building and the adjacent street line, and where more than one building is developed, the maximum yard depths shall only apply to the building nearest the lot line shared with the street; and, a Residential R9 Special Provision (R9-4( )) Zone to permit such uses as apartment buildings and senior citizens apartment buildings, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 1.0 metre for every 1.0 metres of main building height (north), 3.0 metres (maximum 8.0 metres) (west), 3.0 metres (maximum 8.0 metres) (south), and 3.0 metres (east), maximum height of 2 to 4 storeys, maximum density of 120 units per hectare, no parking or drive aisles shall be located between a building and

the adjacent street line, and where more than one building is developed, the maximum yard depths shall only apply to the building nearest the lot line shared with the street.

- **Block 161** - a Residential R9 Special Provision (R9-7( )) Zone to permit such uses as apartment buildings and senior citizens apartment buildings up to a maximum density of 150 units per hectare, together with a special provision to permit a range of Neighbourhood Shopping Area Commercial uses from the NSA1, NSA2 & NSA5 Zones within the ground floor of a mixed-use building, minimum front, exterior side, interior side and rear yard depths of 1.0 metre (maximum 8.0 metres) (north), 3.0 metres (maximum 8.0 metres) (west), 3.0 metres (maximum 8.0 metres) (south), and 3.0 metres (maximum 8.0 metres) (east), maximum height of 1 to 6 storeys, a maximum of 2000 square metres commercial gross floor area shall be permitted within the zone boundaries, commercial gross floor area shall be confined to portions of the site within 100 metre radius of intersection of Wonderland Road North and Sunningdale Road West, no parking or drive aisles shall be located between a building and the adjacent street line, and where more than one building is developed, the maximum yard depths shall only apply to the building nearest the lot line shared with the street.

- **Blocks 162 & 163** - a Residential R5 Special Provision (R5-6( )) Zone to permit townhouses and stacked townhouses up to a maximum density of 50 units per hectare, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 6.0 metres (north), 1.5 metres and 3.0 metres (west) for Blocks 162 and 163 respectively, 3.0 metres (south), and 3.0 metres (east), maximum height of 1 to 4 storeys, front face and primary entrance of all dwellings adjacent a public street shall be oriented to the public street, and townhouse blocks shall be a maximum of 8 units in length.

- **Block 165** – a Residential R1 Special Provision (R1-9( )) Zone to permit single detached dwellings on lots with a minimum lot area of 690 square metres and minimum lot frontage of 18 metres, together with a special provision for an interior side yard for main dwelling of 1.2 metres, except where no private garage is attached to the dwelling, one yard shall be 3.0 metres; and, a Neighbourhood Facility NF/Community Facility CF1 Zone to permit such uses as elementary schools, secondary schools, private schools, places of worship, and day care centres.

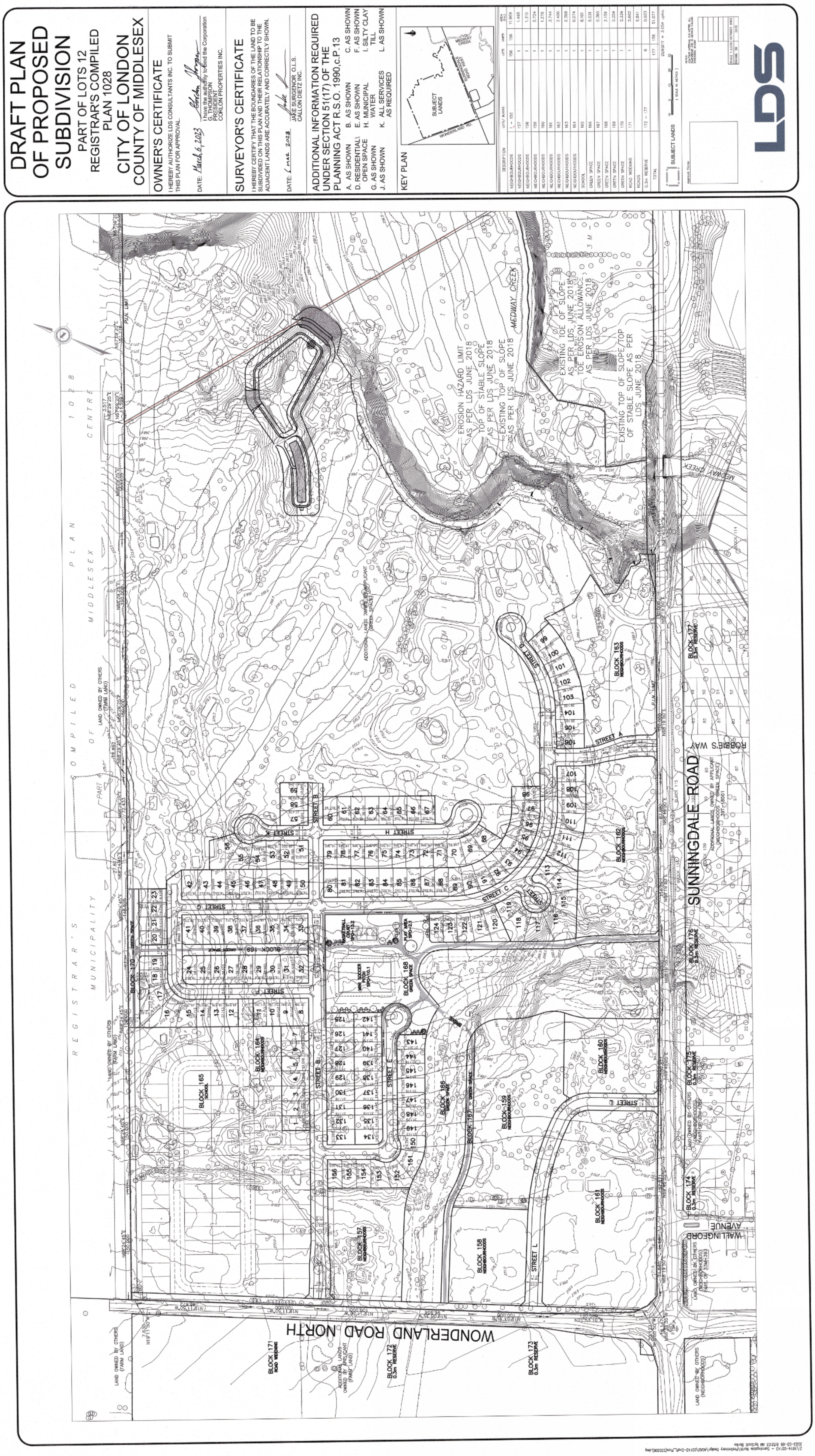
- **Block 166** – an Open Space OS5 Zone to permit conservation lands, conservation works, passive recreation uses which include hiking trails and multi-use pathways, and managed woodlots.

- **Blocks 167, 168, 169 & 170** – an Open Space OS1 Zone to permit such uses as conservation lands, conservation works, golf courses, public and private parks, and recreational buildings associated with conservation lands and public parks.

The following table summarizes additional special provision zones that are being recommended by Staff:

Lots	Zone	Special Provisions
Lots 24 - 32 Lots 33 – 41 Lots 57 & 60	R1-9( )	• Interior side yard for main dwelling of 1.2 metres, except where no private garage is attached to the dwelling, one yard shall be 3.0 metres. • The required exterior side yard for corner lots shall be subject to the regulations of an interior side yard.

2.3 Proposed Draft Plan of Subdivision



2.4 Community Engagement (see more detail in Appendix C)

Two (2) telephone inquiries and seven (7) written responses were received from the public. In addition, there were two (2) email requests for further information. The main concerns expressed are summarized below in italics with Staff's responses to these concerns:

- *Residents were informed that the golf course on the north side of Sunningdale Road would be staying. Instead of facing a golf course, they will be facing a mid-rise or high-rise building. This will add to the overcrowding on Sunningdale Road with multiple high-rise buildings.*

The densest area of the development would centre around the intersection of Wonderland Road North and Sunningdale Road West. Concept plans provided in conjunction with the applicant's Urban Design Brief indicate apartment building forms ranging from 4 to 6 storeys in height. The intent is that there would be a variation in building heights with the tallest (6-storey) buildings located at the intersection of Wonderland/Sunningdale and gradually stepping down to the north and east.

In terms of increase in traffic and congestion, an Environmental Assessment of Sunningdale Road has been completed by the City. This section of Sunningdale Road West between Wonderland Road North and Richmond Street is part of a future phase of planned improvements including widening from two to four through lanes to meet projected transportation requirements in the area, with auxiliary turn lanes at intersections where warranted; cycling infrastructure throughout the Environmental Study Area; sidewalks on both sides of Sunningdale Road West; and a three-metre pathway under the Medway Creek Bridge to allow future connections to the multi-use pathway system.

- *Increase in construction traffic on Wonderland Road and impact from dust, dirt, and debris (stones, rocks. etc.) on pavement surface, bike lanes, boulevard and sidewalks; noise from construction vehicles coming and going; cut-through traffic and excessive speeds.*

The Subdivision Agreement between the City and the subdivider will include conditions that are the developer's responsibility to sweep City streets and undertake regular maintenance of the public right-of-way so that it's clean and free of mud, dirt, and debris transported to and from the development site, as well as adhering to construction access routes which must be approved by the City. It should be noted that Wonderland Road North between Sunningdale Road West and Fanshawe Park Road West is also planned to be widened from two to four lanes in the future to accommodate traffic volumes, provide smoother traffic flows, and lessen cut-through traffic problems on neighbourhood streets.

- *If this development goes forward, there will be need for more retail services, safe access to greenspace, sidewalks for pedestrians on Sunningdale Road, safe access for cyclists, and a larger traffic circle.*

As described above, the proposed development intends to provide opportunities for small-scale retail/commercial uses limited to the ground floor of apartment buildings oriented to the intersection of Wonderland Road North and Sunningdale Road West. The recommended zoning will include a range of uses from the Neighbourhood Shopping Area (NSA) Zone. Community shopping needs including grocery stores are located approximately 1.5 kilometres to the south at Fanshawe Park Road West and Wonderland Road North, as well as large format retail shopping centres are located within close proximity at Masonville Mall and the Hyde Park Power Centre.

The proposed subdivision includes a dedicated multi-use trail network, providing linkages from the existing higher-order streets (Wonderland Road North and Sunningdale Road West) to the interior of the neighbourhood. The trail from Wonderland Road North will provide an important pedestrian connection across the realigned stream corridor into the proposed central park block. Additionally, the trail network will also provide connections to a future multi-use pathway extending along the City's northern municipal boundary. These

trails converge at the neighbourhood park, which is centrally located and accessible to the proposed neighbourhood street network for the subdivision.

- *Concerns expressed from upstream property owners that the drain is not blocked, closed, disturbed, and is properly maintained, and continues to function properly.*

Improvements to the drain (also referred to as the Taylor Drain or Ward-Taylor Drain) are being proposed including realignment through the subject property. City staff will ensure that construction mitigation measures are included in the final design with a focus on upstream and downstream properties not being negatively affected.

- *More attention to conservation and natural spaces, tree preservation, community gardens, communal forms of transportation, and public transit.*

An Environmental Impact Study (EIS) has been completed for all the subdivision lands as part of the application submission. Much of the focus is on the Axford Drain from Wonderland Road North to Sunningdale Road West which is proposed to be rehabilitated to a more natural system promoting fish passage. The drain is currently piped throughout parts of the golf course lands, including online ponds, which over time has resulted in sediment accumulation and overall poor aquatic habitat. The new corridor will remove all piping and fish passage barriers and incorporate improved natural riparian habitat along the Axford Drain through the installation of large natural buffers including woodland, wetland and meadow habitat; provide shrub and tree planting with native trees; incorporate created wetlands of different shapes, sizes and water depths; and improve wildlife movement and natural habitat linkages.

Currently, the Wonderland Road North and Sunningdale Road West area is not serviced directly by London Transit bus routes. The closest route is the No. 34 - Masonville Mall to Western University route with stops approximately one (1) kilometre east, at Sunningdale Road West and Meadowlands Way. However, as more lands to the west develop and the area builds out over time, and with future improvements to Sunningdale Road West, it is anticipated that transit service will be extended to the area.

- *High and medium density apartments will result in more overcrowding and congestion, added strain on schools and healthcare facilities, and alter the character of the community.*

While a range of dwelling types including single detached homes, attached townhouses, and low-rise apartment buildings (4 to 6 storeys) are proposed, the development does not contemplate any high-rise apartment buildings. There is a block identified in the subdivision draft plan which will be reserved for a future elementary or secondary school.

Municipal departments and external agencies were also circulated as part of the Community Engagement process. Significant departmental/agency comments and the applicant's response tables are contained within Appendix C.

2.5 Policy Context

The Planning Act, 1990 and The Provincial Policy Statement, 2020

The Provincial planning policy framework is established through the Planning Act (Section 3) and the Provincial Policy Statement, 2020 (PPS). The Planning Act requires that all municipal land use decisions affecting planning matters shall be consistent with the PPS.

The mechanism for implementing Provincial policies is through the Official Plan, The London Plan. Through the preparation, adoption and subsequent approval of The London Plan, the City of London has established the local policy framework for the implementation of the Provincial planning policy framework. As such, matters of provincial interest are reviewed and discussed in The London Plan analysis below.

As the application for Official Plan and Zoning By-law amendments is consistent with the general intent and purpose of The London Plan, it is staff's opinion that the application is consistent with the Planning Act and the PPS.

The London Plan, 2016

The London Plan constitutes the Official Plan for the City of London, prepared and enacted under the authority of the provisions of Part III of the *Planning Act, R.S.O. 1990, c. P. 13*. It contains goals, objectives, and policies established primarily to manage and direct physical change and the effects on the social, economic, and natural environment of the city.

A strip of land approximately 150 metres in width fronting the east side of Wonderland Road is currently within the Neighbourhoods Place Type; however, most of these lands are within the Green Space Place Type in The London Plan. The proposed residential subdivision requires an amendment to Map 1 – Place Types to change the developable portions of the existing golf course from Green Space, which recognizes and permits the existing golf course as a private open space use, to a Neighbourhoods Place Type.

The Neighbourhoods Place Type permits a range of low-density residential uses including single detached, semi-detached, duplex, and townhouse dwellings for properties fronting on Neighbourhood Streets. Additional uses may be permitted including triplexes and small-scale community facilities on properties fronting a Neighbourhood Connector. Where a Neighbourhood Connector intersects with a Neighborhood Connector, Civic Boulevard or Urban Thoroughfare, a range of secondary permitted uses may be permitted including mixed-use buildings, fourplexes, stacked townhouses and low-rise apartments. In addition, where a Civic Boulevard and Urban Thoroughfare intersect, such as at the intersection of Sunningdale Road West and Wonderland Road North, stand-alone retail, service, and offices may be permitted as secondary uses (Table 10).

Green Space is a city-wide place type that is applied to public and private lands which are part of the City of London's Natural Heritage System, parks and recreational/open space system, hazard lands and natural resources. Permitted uses on lands with the Green Space place type are dependent upon the natural heritage features, hazards, and resources to be protected and the recreational amenities to be provided. An amendment to Map 1 – Place Types is required to apply the Green Space Place Type to recognize and permit open space uses, including the proposed re-aligned and reconstructed Axford Drain corridor and associated dry ponds, a neighbourhood park, and multi-use pathways that are planned as part of the subdivision development.

Staff recommend an amendment to Map 3 – Street Classifications which would add Neighbourhood Connector street classifications aligned with the Neighbourhood Connector roads in the proposed subdivision draft plan.

A site-specific policy amendment to the Neighbourhoods Place Type policies is recommended applying to one of the development blocks (Block 159) within the subdivision plan to permit low-rise apartment buildings (4 storeys maximum) with frontage on a Neighbourhood Connector. The special policy is considered appropriate and would permit uses compatible with the adjacent blocks immediately to the west and south.

<u>Criteria for Specific Policy Areas</u>
The London Plan includes conditions for evaluating the appropriateness of Specific Area Policies where the applicable Place Type policies would not accurately reflect the intent of City Council with respect to a specific site or area (TLP 1729-1734).

The following conditions apply when considering a new Specific Policy Area:

1. The proposal meets all other policies of the Plan beyond those that the specific policy identifies.
2. The proposed policy does not have an adverse impact on the integrity of the place type policies or other relevant parts of this Plan.
3. The proposed use is sufficiently unique and distinctive such that it does not establish an argument for a similar exception on other properties in the area.

4. The proposed use cannot be reasonably altered to conform to the policies of the place type.
5. The proposed policy is in the public interest and represents good planning.

Staff are of the opinion that the proposed Specific Policy Area conforms to the evaluation criteria as discussed under Key Issues and Considerations section below.

Evaluation of Planning and Development Applications

The London Plan also includes evaluation criteria for all planning and development applications with respect to use, intensity and form, as well as with consideration of the following (TLP 1577-1579):

1. Consistency with the Provincial Policy Statement and all applicable legislation.
2. Conformity with the Our City, Our Strategy, City Building, and Environmental policies.
3. Conformity with the Place Type policies.
4. Consideration of applicable guideline documents.
5. The availability of municipal services.
6. Potential impacts on adjacent and nearby properties in the area and the degree to which such impacts can be managed and mitigated.
7. The degree to which the proposal fits within its existing and planned context.

Staff are of the opinion that all the above criteria have been satisfied, and that appropriate zones and special provisions have been applied.

Sunningdale Community Plan / Sunningdale North Area Study

The Sunningdale Community Plan was adopted by Council in June 1998. The Sunningdale North Area Plan was prepared by the City's Planning Division in November 2006 and was subsequently adopted by Council. These guideline documents were prepared to assist in the review of planning and development applications, planning for municipal services, and provide the basis for amendments to the Official Plan and Zoning By-law.

The applicant's Final Proposal Report (FPR) noted that while the Sunningdale North Area Plan did not specifically include the lands occupied by Sunningdale Golf & Country Club, the lands surplus to the golf operation along Wonderland Road (between Sunningdale Road and the municipal boundary) were proposed to accommodate "Multi-Family, Medium Density Residential" development. The proposed uses were consistent with the eventual Official Plan Amendments which provided for the MFMDR land use designation on Schedule 'A' – Land Use, of the City's 1989 Official Plan, and eventually amended as per Map 1 – Place Types within The London Plan.

3.0 Financial Impact/Considerations

Through the completion of the works associated with this application, fees, development charges and taxes will be collected. There will be increased operating and maintenance costs for works being assumed by the City.

4.0 Key Issues and Considerations

4.1 Use

Below is a summary of the recommended zoning and permitted uses by lot and block number and street classification where applicable:

Lots 1 – 156 and Block 164 (fronting on Neighbourhood Connectors and Neighbourhood Streets) - Residential R1 Special Provision (R1-9( )) Zone to permit single detached dwellings on lots with a minimum lot area of 690 square metres and minimum lot frontage of 18 metres, together with a special provision for an interior side yard for main dwelling of 1.2 metres, except where no private garage is attached to the dwelling, one yard shall be 3.0 metres. Most of the proposed lots are in the range of 18 to 20+ metre frontages and

approximately 700 square metres lot area on average. This zone variation is considered appropriate and desirable for the lower density interior portion of the subdivision. The requested minimum interior side yard special provision is considered appropriate and represents the standard yard setback regulation in the R1-9 zone except without the increase in setback proportional to building height above one (1) storey.

The corner lots (Lots 24, 32, 33, and 41) fronting Street F and Street G do not meet the exterior side yard condition under Section 4.29 of the Z.-1 Zoning By-law: …. "When a corner lot is sited so that its rear lot line abuts an adjacent rear lot line, the exterior side yard shall be subject to the regulations of an interior side yard." The condition is such that they will be backing onto an Open Space and pathway corridor block (Block 169). Therefore, staff are recommending a separate R1-9( ) zone be applied with an added special provision that the required exterior side yard specific to these corner lots be subject to the regulations of an interior side yard. Corner Lots 57 and 60 have also been included.

Blocks 157 (frontage on a Neighbourhood Connector and Urban Thoroughfare) - Residential R5 Special Provision (R5-3( )) Zone to permit townhouses and stacked townhouses up to a maximum density of 35 units per hectare. The concept plans for Block 157 indicates a total of approximately 51 dwelling units including a mix of 2-storey and 3-storey, rear-laned townhouses and typical 2-storey townhouses with individual driveway and garage at the front of each unit.

Blocks 158 and 160 (frontage on Neighbourhood Connector and Urban Thoroughfare/Civic Boulevard) will be zoned similarly with a Residential R5 Special Provision (R5-4( )) / Residential R9 Special Provision (R9-4( )) Zone to permit a range of dwelling types including townhouses, stacked townhouses, apartment buildings, and senior citizens apartment buildings. The applicant's Urban Design Brief indicates the concept for both Blocks 158 and 160 includes two (2) 4-storey apartment buildings with a total of 152 units each, having a mix of surface and underground parking. Buildings will be situated close to the intersection and adjacent streets with minimal setbacks, principal building entrances facing the public street, and minimal exposure to parking areas from Wonderland and Sunningdale Roads.

Block 159 (frontage on Neighbourhood Connector (Street 'L')) – The proposed site-specific policy amendment to the Neighbourhoods Place Type applies to this block. The proposed zoning is Residential R5 Special Provision (R5-6( )) Zone / Residential R9 Special Provision (R9-4( )) Zone to permit a range of dwelling types including townhouses, stacked townhouses, apartment buildings, and senior citizens apartment buildings. The concept plans include a mix of 4-storey, back-to-back townhouses, 3-storey, rear-laned townhouses and typical front-garage 2-storey townhouses having a total of 108 units.

Block 161 (frontage on Urban Thoroughfare, Civic Boulevard, and Neighbourhood Connector) – The intent of the zoning is to create a more intensive activity centre around the intersection of Wonderland Road North and Sunningdale Road West. The concept plans include seven apartment buildings ranging from 4 to 6 storeys in height with the higher building forms oriented towards the intersection. The recommended zoning is Residential R9 Special Provision (R9-7( )) Zone to permit apartment buildings and senior citizens apartment buildings up to a maximum density of 150 units per hectare, together with a special provision to permit a range of Neighbourhood Shopping Area Commercial uses from the NSA1, NSA2 & NSA5 Zones within the ground floor of a mixed-use buildings. Zoning regulations would limit the commercial gross floor area to a maximum of 2000 square metres (consistent with Table 12 in Neighbourhoods Place Type policies), as well as to confine these uses to within 100 metres of the intersection of Wonderland Road North and Sunningdale Road West.

Blocks 162 and 163 (frontage on Neighbourhood Connector (Street 'A') and Civic Boulevard) – These blocks will each have their own Residential R5 Special Provision (R5-6( )) Zone to permit townhouses and stacked townhouses up to a maximum density of 50 units per hectare. The concept for Block 162 is a mix of 4-storey back-to-back townhouses with integrated rear garages, 2 and 3-storey rear-laned townhouses, and typical front-garage 2-storey townhouses. There will be street-oriented forms of development along Sunningdale Road West and the future Street 'A', as well as front-facing townhouse units

towards the multi-use pathway and open space corridor. The development concept for Block 163 is intended to permit the same types of townhouse units having similar building siting and orientation.

Block 165 – This is identified on the draft plan as a school block with the potential for residential development as an alternative in the future should the School Boards ultimately decide not to acquire the property. The recommended dual zoning is a Residential R1 Special Provision (R1-9( )) / Neighbourhood Facility NF / Community Facility CF1 Zone which would permit single detached dwellings as well as elementary schools, secondary schools, private schools, places of worship, and day care centres.

Block 166 – Open Space OS5 Zone to permit conservation lands, conservation works, passive recreation uses which include hiking trails and multi-use pathways, and managed woodlots. This zoning is typically applied to important natural heritage features and functions and is appropriate for the open space corridor consisting of the proposed reconstructed / realigned Axford Drain.

Blocks 167, 168, 169 & 170 – Open Space OS1 Zone is recommended to permit such uses as conservation lands, conservation works, golf courses, public and private parks, and recreational buildings associated with conservation lands and public parks. This zone is appropriate for the centrally located neighbourhood park, multi-use pathways, and green space connections. The 2.16 hectare neighbourhood park is expected to include active recreation uses such as a mini soccer pitch, basketball court, and a children's play structure.

Overall, the recommended zoning and range of permitted uses are considered appropriate and compatible with existing and future land uses in the surrounding area, consistent with the Provincial Policy Statement, and conform with the policies of The London Plan.

4.2 Intensity

Table 11 - Range of Permitted Heights in the Neighbourhoods Place Type provides for building height restrictions that are based on street classification. For the subject lands a range of building heights of between one (1) and three (3) storeys are permitted for properties fronting on Neighbourhood Streets and Neighbourhood Connectors; a minimum two (2), standard maximum three (3) and upper maximum four (4) storeys where Neighbourhood Connectors intersect; and a minimum two (2), standard maximum four (4) and upper maximum six (6) storeys where a Neighbourhood Connector intersects with a Civic Boulevard or Urban Thoroughfare. Similarly, where a property has frontage on a Civic Boulevard or an Urban Thoroughfare, a minimum two (2), standard maximum four (4) and upper maximum six (6) storeys may be permitted along these street classifications.

The minimum and maximum height regulations in the special provision zones for the proposed development blocks have been reviewed and are generally in keeping with the range of heights permitted in Table 11 of The London Plan, as outlined above. Intensity in terms of building height and density based on the recommended zoning will be the highest at the intersection of the Wonderland Road North and Sunningdale Road West, gradually transitioning to 4 and 5 storey buildings to the north and east, and then 1 to 3 storeys for the interior residential lots within the subdivision plan.

The following table summarizes the estimated residential unit count based on the applicant's submitted development concept plans and Urban Design Brief analysis.

Lots/Blocks	Units	Dwelling Type
1 - 156	156	Single Detached Dwellings
157	51	2-Storey and 3-Storey Townhouses
158	152	4-Storey Apartments
159	108	2-Storey and 3-Storey Townhouses and Back-To-Back Townhouses (4-Storeys)
160	152	4-Storey Apartments

161	544	4, 5, and 6-Storey Apartments
162	108	2-Storey and 3-Storey Townhouses and Back-To-Back Townhouses (4-Storeys)
163	89	2-Storey and 3-Storey Townhouses and Back-To-Back Townhouses (4-Storeys)
Total	**1,360**	

Overall, the proposed height, scale and intensity is considered appropriate based on the location at the intersection of higher order streets and consistent with the principle of gradually transitioning down in intensity as you move away from the intersection.

4.3 Form

This principle of transition applies in a similar way to the subdivision design and form of development. The special provision zoning includes site specific setback regulations that ensures a strong building orientation and massing to adjacent streets and intersections of subdivision streets with Sunningdale Road West and Wonderland Road North, as well as opportunities for principal entrances oriented towards the public streets. Including some townhouse units oriented towards the multi-use pathway and naturalized corridor has also been considered.

The draft plan of subdivision includes 156 single detached lots, seven (7) multi-family blocks, four parkland blocks, one open space block and a school block. The subdivision has been laid out in a modified grid pattern framed by existing Wonderland Road North and Sunningdale Road West, and the realigned Axford Drain corridor. A series of multi-family development blocks are established along Wonderland Road North and Sunningdale Road West. Single detached residential lots are located internal to the site, along the proposed Neighbourhood Connectors and Neighbourhood Streets.

The draft plan includes a network of streets connected with multi-use pathways. This network consists of five new Neighbourhood Connectors (Streets ‘A’, ‘B’, ‘C’, ‘D’ and Street ‘L’) with a 23m right-of-way and six Neighbourhood Streets (Streets ‘E’, ‘F’, ‘G’, ‘H’, ‘I’ and ‘K’) with a 20.0m right-of-way. The plan includes four new public road accesses to the site, two accesses from Wonderland Road North and two accesses from Sunningdale Road West. Neighbourhood Connectors and Neighbourhood Streets will include 1.5 metre sidewalks on both sides.

Three new pedestrian connections to the site are also planned through a multi-use pathway network. The pathway connects from the proposed park block west to Wonderland Road North and south to Sunningdale Road West. A connection to the City’s planned pathway network along the northern municipal boundary has also been accommodated for. The subdivision plan exhibits not only neighbourhood connectivity but also elements of a complete community, including residential and small-scale commercial uses, highly accessible neighourhood park and multi-use pathway network, naturalized channel feature, and neighbourhood facilities including a future elementary or secondary school.

4.4 Technical Revisions to the Draft Plan

The draft plan of subdivision provided in this report is undergoing further refinements and technical revisions which City staff are working through with the applicant. A number of red-line revisions are being recommended, a few of which include a realignment of Street ‘L’ to have minimum centreline radii that meets City design standards; removing cul-de-sacs and providing easements for temporary turning circles noting that there are several dead-ending streets which are intended to extend into a future subdivision phase; adjusting the eastern limits of Block 163 in accordance with the revised EIS recommendations; providing 6m x 6m daylighting triangles at the intersections of all streets; and adding 0.3 metre reserves to various block within the plan. It is expected that a final “clean” version of the draft plan will be brought forward for draft approval by the City of London Approval Authority.

Conclusion

The proposed Zoning By-Law and Official Plan Amendments are consistent with the Provincial Policy Statement, 2020 which promotes densities for new housing which efficiently use land, resources, and infrastructure. The recommended amendments are also consistent with the general intent and purpose of The London Plan. Staff recommend approval of the amendments to facilitate the proposed residential development.

Prepared by:	**Larry Mottram, MCIP, RPP** **Senior Planner, Subdivision Planning**
Reviewed by:	**Bruce Page** **Manager, Subdivision Planning**
Recommended by:	**Heather McNeely, MCIP, RPP** **Director, Planning and Development**
Submitted by:	**Scott Mathers, MPA, P.Eng.** **Deputy City Manager, Planning and Economic Development**

cc: Peter Kavcic, Manager, Subdivisions and Development Inspections
Michael Harrison, Manager, Subdivision Engineering
Britt O'Hagan, Manager, Current Development
Mike Corby, Manager, Site Plans
Brent Lambert, Manager, Development Engineering

SM/HM/BP/lm

Appendix A – Official Plan Amendment

Bill No. (Number to be inserted by Clerk's Office)
2024

By-law No. C.P.-XXXX-__

A by-law to amend the Official Plan, The London Plan, for the City of London, 2016 relating to 465 Sunningdale Road West.

The Municipal Council of The Corporation of the City of London enacts as follows:

1. Amendment No. (to be inserted by Clerk's Office) to the Official Plan, The London Plan, for the City of London Planning Area – 2016, as contained in the text attached hereto and forming part of this by-law, is adopted.

2. This Amendment shall come into effect in accordance with subsection 17(27) of the *Planning Act, R.S.O. 1990, c.P.13*.

PASSED in Open Council on September 24, 2024 subject to the provisions of PART VI.1 of the *Municipal Act*, 2001.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – September 24, 2024
Second Reading – September 24, 2024
Third Reading – September 24, 2024

AMENDMENT NO.
to the
OFFICIAL PLAN, THE LONDON PLAN, FOR THE CITY OF LONDON

A. PURPOSE OF THIS AMENDMENT

The purpose of this Amendment is to facilitate a proposed residential subdivision development by amending Map 1 – Place Types by applying the corresponding Neighbourhoods and Green Space Place Types; amending Map 3 – Street Classifications and adding Neighbourhood Connector streets; and adding a Specific Policy to the Neighbourhoods Place Type, together with a corresponding amendment to Map 7 – Specific Policy Areas, to permit low-rise apartment buildings (4 storeys maximum) with frontage on a Neighbourhood Connector Street.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to lands located at 465 Sunningdale Road West, north side, east of Wonderland Road North, in the City of London as shown on "Schedule 1" attached hereto.

C. BASIS OF THE AMENDMENT

The subject of this amendment is a 51 hectare site consisting of an existing golf course property located at 465 Sunningdale Road West. The site is bounded by Sunningdale Road West on the south, Wonderland Road North on the west, the City of London boundary with the Municipality of Middlesex Centre on the north, and the remaining golf course lands and facilities owned by Sunningdale Golf and Country Club Ltd. on the east. The site is also bounded by the City's Urban Growth Boundary formed by Wonderland Road North and the east-west municipal boundary and current City Limits. An existing Sun-Canadian oil pipeline easement also runs along the municipal boundary just inside the northerly limits of the site. An application for approval of a draft plan of subdivision has been submitted for development of a proposed low to medium density residential subdivision (File No. 39T-23503).

A narrow strip fronting along the east side of Wonderland Road is currently within the "Neighbourhoods" Place Type in The London Plan. However, most of the subject lands are currently within the "Green Space" Place Type. The proposed residential subdivision requires an amendment to Map 1 – Place Types to change the developable portions of the existing golf course from Green Space, which presently recognizes and permits the golf course as private open space lands, to a Neighbourhoods Place Type. The Green Space Place Type would be applied to recognize open space uses, including a proposed re-aligned and reconstructed Axford Drain corridor and associated dry ponds, a neighbourhood park, and multi-use pathways that are planned as part of the subdivision development.

Map 3 – Street Classifications would be amended by adding "Neighbourhood Connector" classifications that generally corresponds with the Neighbourhood Connector roads in the proposed subdivision draft plan. Finally, a site-specific policy amendment to the Neighbourhoods Place Type policies and an amendment to Map 7 – Specific Policy Area is recommended for one of the development blocks (Block 159) with the subdivision plan to permit low-rise apartment buildings (4 storeys maximum) with frontage on a Neighbourhood Connector. The special policy is considered appropriate and would permit uses compatible with the adjacent blocks immediately to the west and south.

D. THE AMENDMENT

The Official Plan, the London Plan, for the City of London is hereby amended as follows:

1. Map 1 - Place Types, to the Official Plan, The London Plan, for the City of London Planning Area is amended by redesignating a portion of the subject lands from a Neighbourhoods Place Type to a Green Space Place Type, and

from a Green Space Place Type to a Neighbourhoods Place Type, as indicated on “Schedule 2” attached hereto.

2. Map 3 – Streets Classification, to the Official Plan, The London Plan, for the City of London Planning Area is amended by adding Neighbourhood Connectors, as indicated on “Schedule 3” attached hereto.

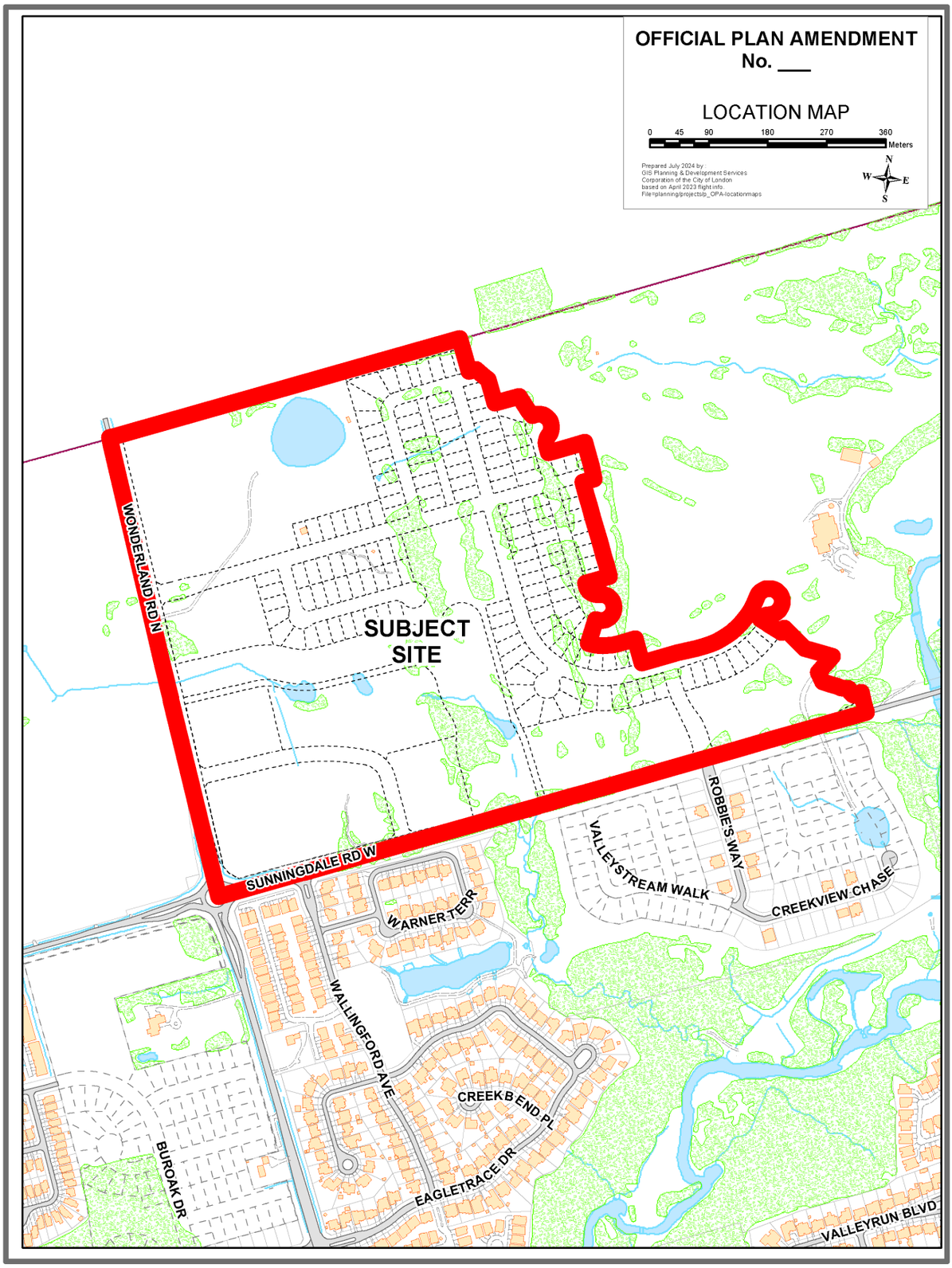
3. Specific Policies for the Neighbourhoods Place Type of the Official Plan, The London Plan, for the City of London is amended by adding the following:

    (__) 465 Sunningdale Road West

    For the lands in the Neighbourhoods Place Type located at 465 Sunningdale Road West, as shown on Map 7 – Specific Policy Areas, low-rise apartment buildings (4 storeys maximum) with frontage on a Neighbourhood Connector may be permitted.

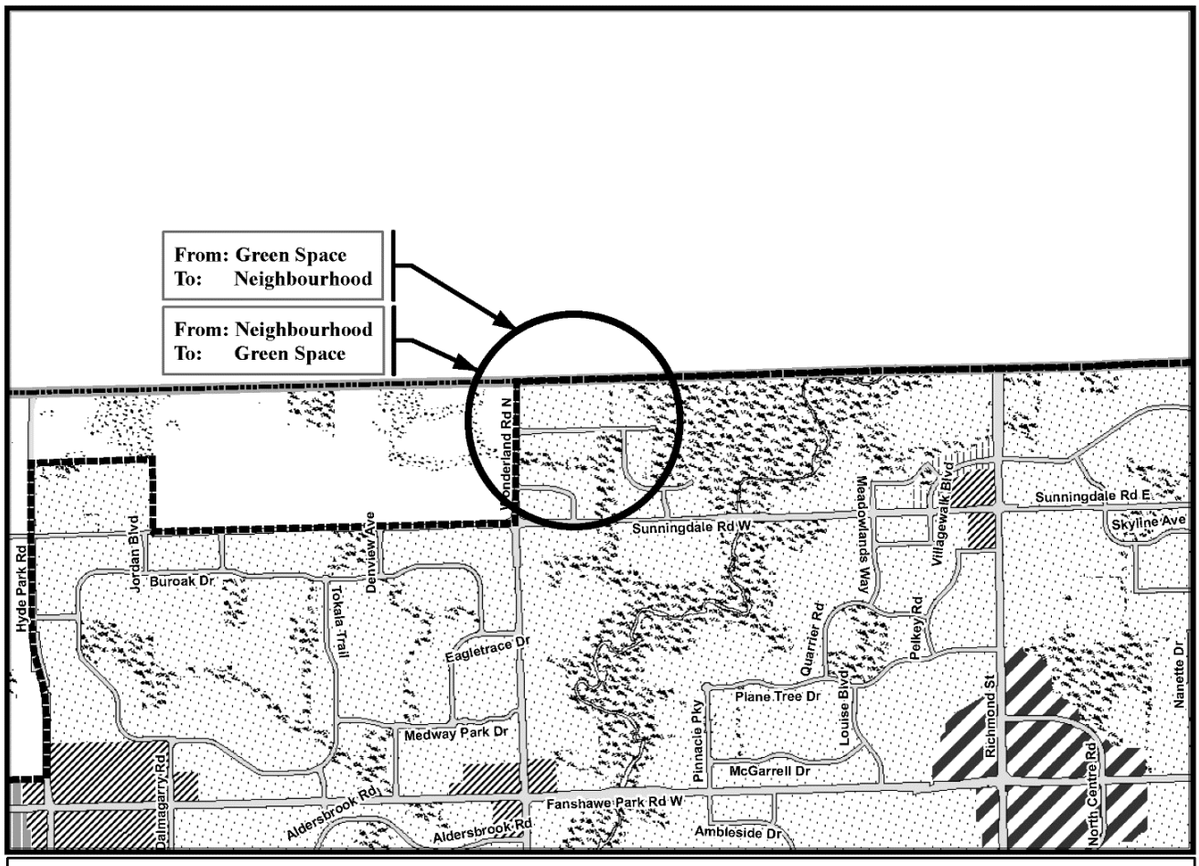
4. Map 7 - Specific Policy Areas, to the Official Plan, The London Plan, for the City of London Planning Area is amended by adding a Specific Policy Area for the lands located at 465 Sunningdale Road West in the City of London, as indicated on “Schedule 4” attached hereto.

“Schedule 1”


OFFICIAL PLAN AMENDMENT
No. ___
LOCATION MAP
0 45 90 180 270 360
Meters
Prepared July 2024 by :
GIS Planning & Development Services
Corporation of the City of London
based on April 2023 flight info.
File=planning/projects/p_OPA-locationmaps
N
W E
S
SUBJECT SITE
WONDERLAND RD N
SUNNINGDALE RD W
WARNER TERR
WALLINGFORD AVE
CREEK B END PL
EAGLETRACE DR
BUR OAK DR
VALLEYSTREAM WALK
ROBBIE'S WAY
CREEKVIEW CHASE
VALLEYRUN BLVD

“Schedule 2”

AMENDMENT NO:



Legend

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

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

SCHEDULE 1
TO

OFFICIAL AMENDMENT NO. _____

PREPARED BY: Planning & Development

Scale 1:30,000

0 150 300 600 900 1,200 1,500

Meters

FILE NUMBER: OZ-8310

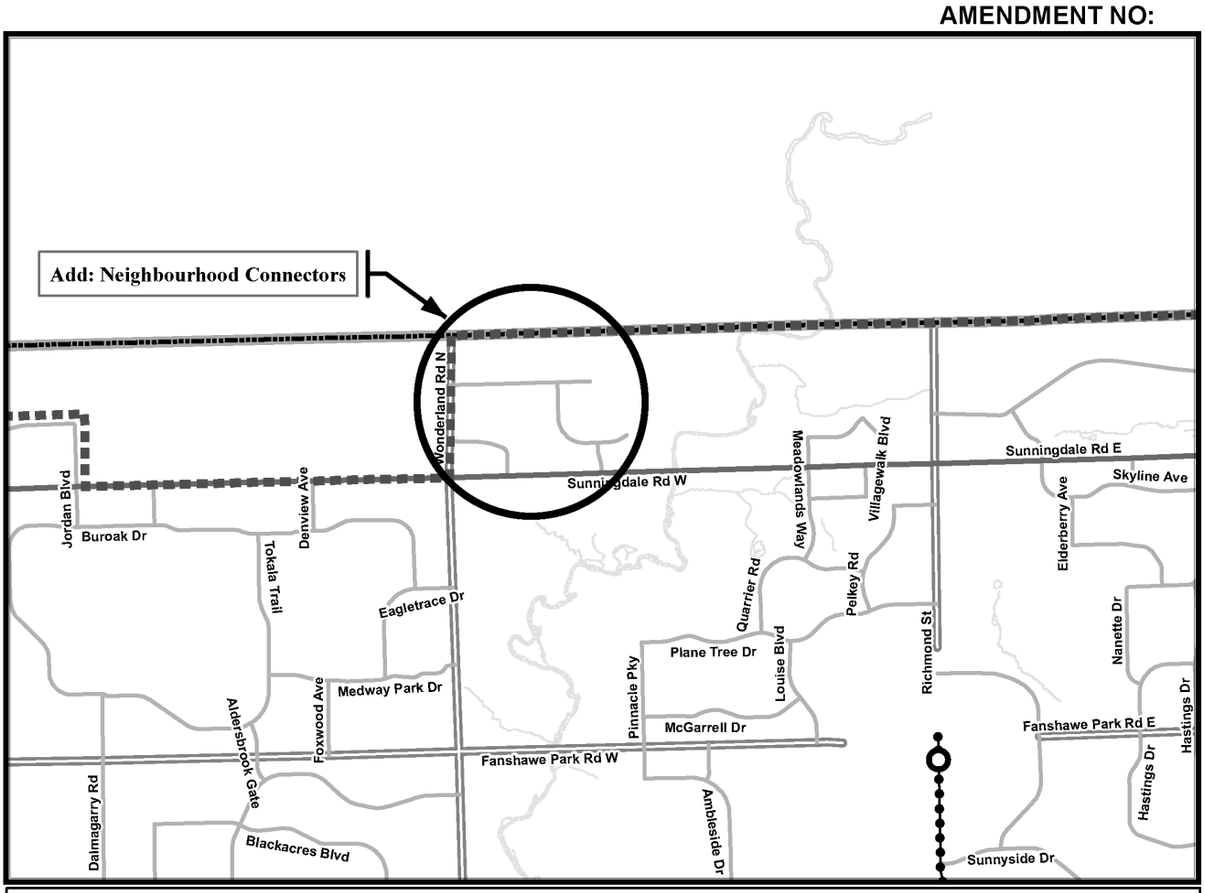
PLANNER: MD

TECHNICIAN: MB

DATE: 7/23/2024

“Schedule 3”

AMENDMENT NO:



Legend

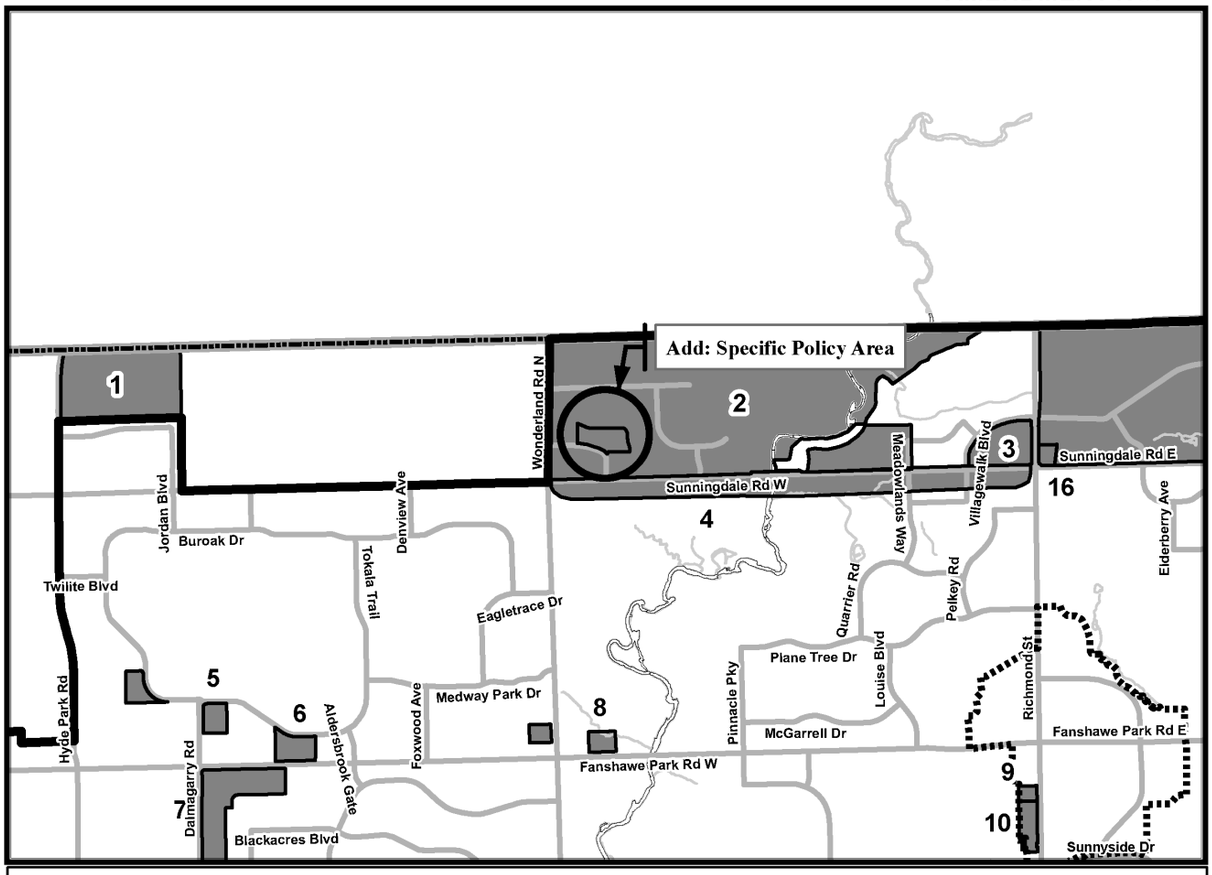
- Provincial Highway
- Expressway
- Urban Thoroughfare
- Rapid Transit Boulevard
- Civic Boulevard
- Main Street
- Neighbourhood Connector
- Rural Thoroughfare
- Rural Connector
- Interchanges
- Rapid Transit Stations
- Urban Growth Boundary

This is an excerpt from the Planning Division's working consolidation of Map 3 - Street Classifications of the London Plan, with added notations.

SCHEDULE 2 **TO** **OFFICIAL AMENDMENT NO. _____** PREPARED BY: Planning & Development	Scale 1:30,000 0 150 300 600 900 1,200 1,500 Meters	**FILE NUMBER:** OZ-9623 **PLANNER:** LM **TECHNICIAN:** RC **DATE:** 7/23/2024

“Schedule 4”

AMENDMENT NO:



LEGEND

- Specific Policies
- Rapid Transit and Urban Corridor Specific-Segment Policies
- Near Campus Neighbourhood
- Secondary Plans

BASE MAP FEATURES

- Streets (See Map 3)
- Railways
- Urban Growth Boundary
- Water Courses/Ponds

This is an excerpt from the Planning Division's working consolidation of Map 7 - Special Policy Areas of the London Plan, with added notations.

SCHEDULE 3
TO

OFFICIAL AMENDMENT NO. _____

PREPARED BY: Planning & Development

Scale 1:30,000

0 150 300 600 900 1,200 1,500

Meters

FILE NUMBER: OZ-9623

PLANNER: LM

TECHNICIAN: RC

DATE: 7/23/2024

Appendix B

Bill No. (number to be inserted by Clerk's Office)
2024

By-law No. Z.-1-24_____

A by-law to amend By-law No. Z.-1 to rezone an area of land located at 465 Sunningdale Road West.

WHEREAS Corlon Properties Inc. has applied to rezone an area of land located at 465 Sunningdale Road West, as shown on the map attached to this by-law, as set out below;

AND WHEREAS upon approval of Official Plan Amendment Number (number to be inserted by Clerk's Office) this rezoning conforms to the Official Plan;

THEREFORE the Municipal Council of The Corporation of the City of London enacts as follows:

1) Schedule "A" to By-law No. Z.-1 is amended by changing the zoning applicable to lands located at 465 Sunningdale Road West, as shown on the attached map comprising part of Key Map No. A102, from an Open Space OS1 Zone, an Environmental Review ER Zone, and an Open Space OS5 Zone to a Residential R1 Special Provision (R1-9(*)) Zone; a Residential R1 Special Provision (R1-9(**)) Zone; a Residential R1 Special Provision/Neighbourhood Facility/Community Facility (R1-9(*)/NF/CF1)) Zone; a Residential R5 Special Provision (R5-3( )) Zone; a Residential R5 Special Provision/Residential R9 Special Provision (R5-4(*)/R9-4(*)) Zone; a Residential R5 Special Provision/Residential R9 Special Provision (R5-4(**)/R9-4(***)) Zone; a Residential R5 Special Provision/Residential R9 Special Provision (R5-6(*)/R9-4(**)) Zone; a Residential R5 Special Provision (R5-6(**)) Zone; a Residential R5 Special Provision (R5-6(***)) Zone; a Residential R9 Special Provision (R9-7( )) Zone; an Open Space OS1 Zone; and an Open Space OS5 Zone.

2) Section Number 5.4 of the Residential R1 Zone is amended by adding the following Special Provision:

R1-9(*)

a) Regulations:

i)	Interior Side Yard Depth (Minimum)	1.2 metres, except where no private garage is attached to the dwelling, one side yard shall be 3.0 metres.

3) Section Number 5.4 of the Residential R1 Zone is amended by adding the following Special Provision:

R1-9(**)

a) Regulations:

i)	Interior Side Yard Depth (Minimum)	1.2 metres, except where no private garage is attached to the dwelling, one side yard shall be 3.0 metres.
ii)	The required exterior side yard for corner lots shall be subject to the regulations of an interior side yard.	

4) Section Number 9.4 of the Residential R5 Zone is amended by adding the following Special Provision:

R5-3( )

a) Regulations:

i)	West Yard Depth (Minimum)	3.0 metres
ii)	North Yard Depth (Minimum)	3.0 metres
iii)	South Yard Depth (Minimum)	1.5 metres
iv)	East Yard Depth (Minimum)	1.0 metre for every 1.0 metre of main building height, or fraction thereof;
v)	Height	1 storey (Minimum) 3 storeys (Maximum)
vi)	Front face and primary entrance of all dwelling units located adjacent to a public street shall be oriented to the public street.	
vii)	Townhouse blocks shall be a maximum of eight (8) units in length.	

5) Section Number 9.4 of the Residential R5 Zone is amended by adding the following Special Provision:

R5-4(*)

a) Regulations:

i)	West Yard Depth	3.0 metres (Minimum) 8.0 metres (Maximum)
ii)	North Yard Depth (Minimum)	3.0 metres
iii)	South Yard Depth	3.0 metres (Minimum) 8.0 metres (Maximum)
iv)	East Yard Depth (Minimum)	1.0 metre for every 1.0 metre of main building height, or fraction thereof;
v)	Landscaped Open Space (Minimum)	30%
vi)	Lot Coverage (Maximum)	30%
vii)	Height	2 storeys (Minimum) 4 storeys (Maximum)
viii)	No parking or drive aisles shall be located between a building and the adjacent street line.	

ix) Where more than one building is to be developed, the maximum yard depths shall only apply to the building nearest to the lot line shared with the street.

6) Section Number 9.4 of the Residential R5 Zone is amended by adding the following Special Provision:

R5-4(**)

a) Regulations:

i)	South Yard Depth	3.0 metres (Minimum) 8.0 metres (Maximum)
ii)	East Yard Depth (Minimum)	3.0 metres
iii)	West Yard Depth	3.0 metres (Minimum) 8.0 metres (Maximum)
iv)	North Yard Depth (Minimum)	1.0 metre for every 1.0 metre of main building height, or fraction thereof;
v)	Landscaped Open Space (Minimum)	30%
vi)	Lot Coverage (Maximum)	30%
vii)	Height	2 storeys (Minimum) 4 storeys (Maximum)

viii) No parking or drive aisles shall be located between a building and the adjacent street line.

ix) Where more than one building is to be developed, the maximum yard depths shall only apply to the building nearest to the lot line shared with the street.

7) Section Number 9.4 of the Residential R5 Zone is amended by adding the following Special Provision:

R5-6(*)

a) Regulations:

i)	Southwest Yard Depth (Minimum)	3.0 metres
ii)	Southeast Yard Depth (Minimum)	6.0 metres
iii)	West Yard Depth (Minimum)	6.0 metres
iv)	North Yard Depth Depth (Minimum)	1.2 metres
v)	Landscaped Open Space (Minimum)	30%

vi) Lot Coverage (Maximum) — 30%

vii) Height — 1 storey (Minimum)
4 storeys (Maximum)

viii) Front face and primary entrance of all dwelling units located adjacent to a public street shall be oriented to the public street.

ix) Townhouse blocks shall be a maximum of eight (8) units in length.

8) Section Number 9.4 of the Residential R5 Zone is amended by adding the following Special Provision:

R5-6(**)

a) Regulations:

i) North Yard Depth (Minimum) — 6.0 metres

ii) West Yard Depth (Minimum) — 1.5 metres

iii) South Yard Depth (Minimum) — 3.0 metres

iv) East Yard Depth (Minimum) — 3.0 metres

v) Height — 1 storey (Minimum)
4 storeys (Maximum)

vi) Front face and primary entrance of all dwelling units located adjacent to a public street shall be oriented to the public street.

vii) Townhouse blocks shall be a maximum of eight (8) units in length.

9) Section Number 9.4 of the Residential R5 Zone is amended by adding the following Special Provision:

R5-6(***)

a) Regulations:

i) North Yard Depth (Minimum) — 6.0 metres

ii) West Yard Depth (Minimum) — 3.0 metres

iii) South Yard Depth (Minimum) — 3.0 metres

iv) East Yard Depth (Minimum) — 3.0 metres

v) Height — 1 storey (Minimum)
4 storeys (Maximum)

vi) Front face and primary entrance of all dwelling units located adjacent to a public street shall be oriented to the public street.

vii) Townhouse blocks shall be a maximum of eight (8) units in length.

10) Section Number 13.4 of the Residential R9 Zone is amended by adding the following Special Provision:

R9-4(*)

a) Regulations:

i)	West Yard Depth	3.0 metres (Minimum) 8.0 metres (Maximum)
ii)	North Yard Depth (Minimum)	3.0 metres
iii)	South Yard Depth	3.0 metres (Minimum) 8.0 metres (Maximum)
iv)	East Yard Depth (Minimum)	1.0 metre for every 1.0 metre of main building height, or fraction thereof;
v)	Height	2 storeys (Minimum) 4 storeys (Maximum)
vi)	Density (Maximum)	120 units per hectare

vii) No parking or drive aisles shall be located between a building and the adjacent street line.

viii) Where more than one building is to be developed, the maximum yard depths shall only apply to the building nearest to the lot line shared with the street.

11) Section Number 13.4 of the Residential R9 Zone is amended by adding the following Special Provision:

R9-4(**)

a) Regulations:

i)	Southwest Yard Depth (Minimum)	3.0 metres
ii)	Southeast Yard Depth (Minimum)	6.0 metres
iii)	West Yard Depth (Minimum)	6.0 metres
iv)	North Yard Depth (Minimum)	1.2 metres
v)	Height	1 storey (Minimum) 4 storeys (Maximum)

vi) Front face and primary entrance of all dwelling units located adjacent to a public street shall be oriented to the public street.

vii) Townhouse blocks shall be a maximum of eight (8) units in length.

12) Section Number 13.4 of the Residential R9 Zone is amended by adding the following Special Provision:

R9-4(***)

a) Regulations:

i)	South Yard Depth	3.0 metres (Minimum) 8.0 metres (Maximum)
ii)	East Yard Depth (Minimum)	3.0 metres
iii)	West Yard Depth	3.0 metres (Minimum) 8.0 metres (Maximum)
iv)	North Yard Depth (Minimum)	1.0 metre for every 1.0 metre of main building height, or fraction thereof;
v)	Height	2 storeys (Minimum) 4 storeys (Maximum)
vi)	Density (Maximum)	120 units per hectare

vii) No parking or drive aisles shall be located between a building and the adjacent street line.

viii) Where more than one building is to be developed, the maximum yard depths shall only apply to the building nearest to the lot line shared with the street.

13) Section Number 13.4 of the Residential R9 Zone is amended by adding the following Special Provision:

R9-7( )

a) Additional Permitted Uses:

i) Permitted uses of the NSA1, NSA2 and NSA5 Zone may be permitted within the ground floor of a mixed-use building.

b) Regulations:

i)	North Yard Depth	1.0 metre (Minimum) 8.0 metres (Maximum)
ii)	West Yard Depth	3.0 metres (Minimum) 8.0 metres (Maximum)
iii)	South Yard Depth	3.0 metres (Minimum) 8.0 metres (Maximum)
iv)	East Yard Depth	3.0 metres (Minimum) 8.0 metres (Maximum)
v)	Height	1 storey (Minimum) 6 storeys (Maximum)

vi) A maximum of 2000 square metres commercial gross floor area may be permitted within the zone boundaries.

vii) Commercial gross floor area shall be confined to portions of the site within a 100 metre radius of the intersection of Wonderland Road North and Sunningdale Road West

viii) No parking or drive aisles shall be located between a building and the adjacent street line.

ix) Where more than one building is to be developed, the maximum yard depths shall only apply to the building nearest to the lot line shared with the street.

The inclusion in this By-law of imperial measure along with metric measure is for the purpose of convenience only and the metric measure governs in case of any discrepancy between the two measures.

This By-law shall come into force and be deemed to come into force in accordance with Section 34 of the *Planning Act*, *R.S.O. 1990, c. P13,* either upon the date of the passage of this by-law or as otherwise provided by the said section.

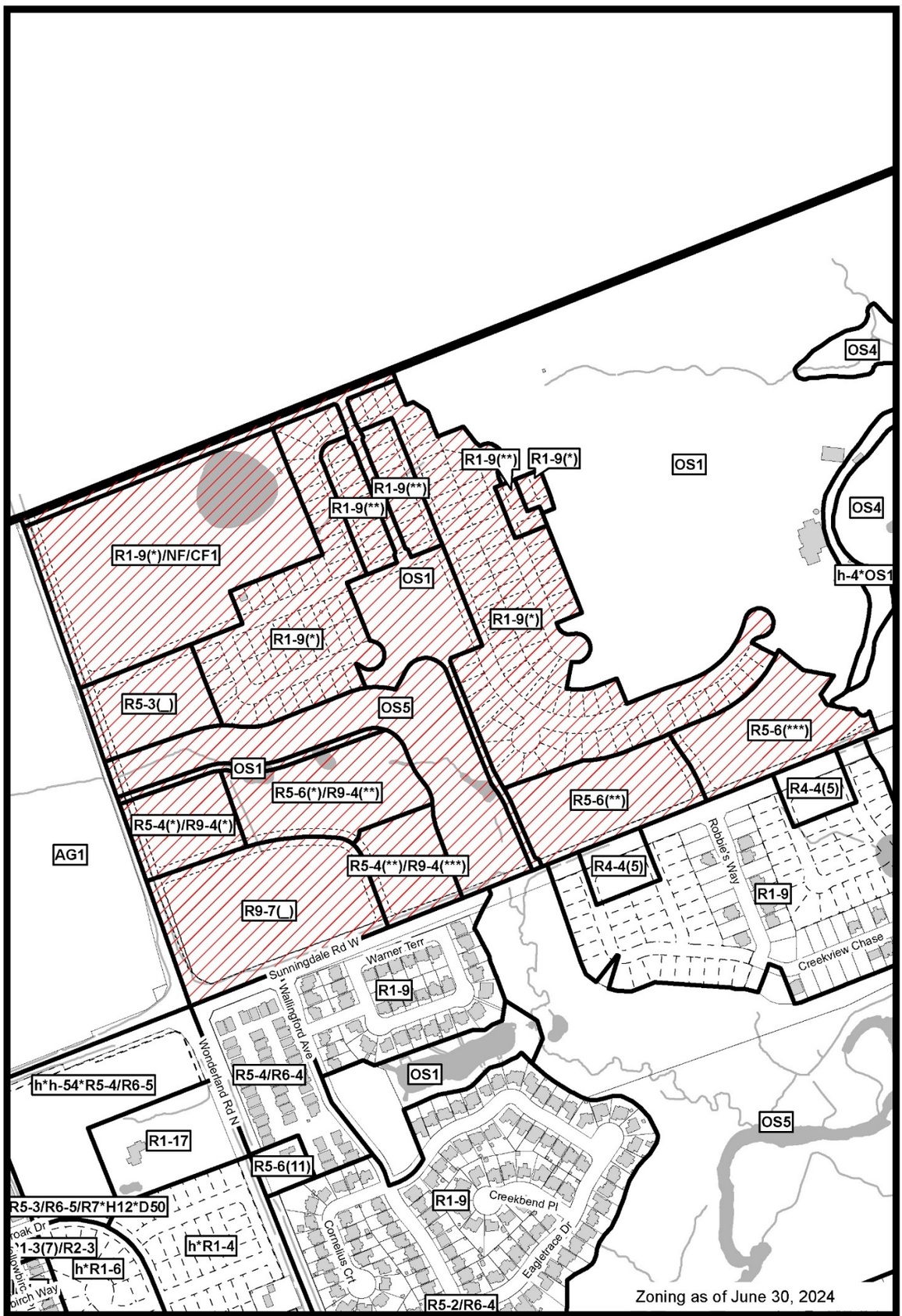
PASSED in Open Council on September 24, 2024, subject to the provisions of PART VI.1 of the *Municipal Act*, 2001.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First Reading – September 24, 2024
Second Reading – September 24, 2024
Third Reading – September 24, 2024

AMENDMENT TO SCHEDULE "A" (BY-LAW NO. Z.-1)



File Number: OZ-9623

Planner: LM

Date Prepared: 2024/07/19

Technician: RC

By-Law No: Z.-1-

SUBJECT SITE

1:6,500

0 30 60 120 180 240 Meters

Appendix C – Public Engagement

Community Engagement

Public liaison: On June 28, 2023, a Notice of Application was sent to 81 property owners in the surrounding area. A Notice was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on June 29, 2023. “Planning Application” signs were also posted on-site.

Responses: Two (2) telephone inquiries and seven (7) written responses were received (see below). In addition, there were two (2) email requests for further information.

Nature of Liaison: The purpose and effect of this application is to consider a proposed draft plan of subdivision, Official Plan and zoning amendments to allow a residential subdivision consisting of single detached dwellings, multiple-attached dwellings including townhouses, low-rise apartment and mixed-use buildings, neighbourhood facilities, parks, open spaces, multi-use pathways, stormwater management facilities, and a reconstructed/realigned drain corridor; served by eight (8) public streets.

Draft Plan of Subdivision – Consideration of a Draft Plan of Subdivision consisting of 156 single detached residential lots, one (1) future residential/public road access block, one (1) school block, six (6) multi-family residential blocks, one (1) multi-family residential/mixed use block, four (4) blocks for neighbourhood park and multi-use pathways, one (1) open space block for the reconstructed/realigned Axford Drain corridor and two (2) associated dry pond SWM facilities, all served by eight (8) public roads.

Official Plan Amendment – Consideration of possible amendments to The London Plan to change the designation on a portion of the property from the “Green Space” Place Type to the “Neighbourhoods” Place Type to permit a range of uses including single detached, semi-detached, and duplex dwellings, triplexes, fourplexes, townhouses, stacked townhouses, low-rise apartments, mixed-use buildings, community facilities, and stand-alone retail, service and office uses. The Neighbourhoods Place Type would be applied to all residential lots and blocks, the school block, and all public road rights-of-way. The Green Space Place Type would be applied to all parkland and open space blocks as shown on the proposed draft plan of subdivision. A specific policy for the Neighbourhood Place Type is also requested to permit low-rise apartment buildings (4 storeys max.) on Block 159 which fronts on a “Neighbourhood Connector” street.

Zoning By-law Amendment - Consideration of an amendment to the zoning by-law to change the zoning from an Open Space OS1 Zone, an Environmental Review ER Zone, and an Open Space OS5 Zone to the following zones: **Lots 1 to 156 inclusive and Block 164** – a Residential R1 Special Provision (R1-9( )) Zone to permit single detached dwellings on lots with a minimum lot area of 690 square metres and minimum lot frontage of 18 metres, together with a special provision for an interior side yard for main dwelling of 1.2 metres, except where no private garage is attached to the dwelling, one yard shall be 3.0 metres; **Block 157** - a Residential R5 Special Provision (R5-3( )) Zone to permit townhouses and stacked townhouses up to a maximum density of 35 units per hectare, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 3.0 metres (north), 3.0 metres (west), 1.5 metres (south), and 1.0 metre for every 1.0 metres of main building height (east), maximum height of 1 to 3 storeys, front face and primary entrance of all dwellings adjacent a public street shall be oriented to the public street, and townhouse blocks shall be a maximum of 8 units in length; **Block 158** - a Residential R5 Special Provision (R5-4( )) Zone to permit townhouses and stacked townhouses up to a maximum density of 40 units per hectare, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 3.0 metre (north), 3.0 metres (maximum 8.0 metres) (west), 3.0 metres (maximum 8.0 metres) (south), and 1.0 metre for every 1.0 metres of main building height (east), minimum landscaped open space of 30%, maximum lot coverage of 30%, maximum height of 2 to 4 storeys, no parking or drive aisles shall be located between a building and the adjacent street line, and where more than one building is developed, the maximum yard depths shall only apply to the building nearest the lot line shared with the street; and, a Residential R9 Special Provision (R9-4( )) Zone to permit such uses as apartment buildings and senior

citizens apartment buildings, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 3.0 metres (north), 3.0 metres (maximum 8.0 metres) (west), 3.0 metres (maximum 8.0 metres) (south), and 1.0 metre for every 1.0 metres of main building height (east), maximum height of 2 to 4 storeys, maximum density of 120 units per hectare, no parking or drive aisles shall be located between a building and the adjacent street line, and where more than one building is developed, the maximum yard depths shall only apply to the building nearest the lot line shared with the street; **Block 159** – a Residential R5 Special Provision (R5-6( )) Zone to permit townhouses and stacked townhouses up to a maximum density of 50 units per hectare, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 1.2 metres (north), 6.0 metres (west), 3.0 metres (southwest), and 6.0 metres (southeast), minimum landscaped open space of 30%, maximum lot coverage of 30%, maximum height of 1 to 4 storeys, front face and primary entrance of all dwellings adjacent a public street shall be oriented to the public street, and townhouse blocks shall be a maximum of 8 units in length; and, a Residential R9 Special Provision (R9-4( )) Zone to permit such uses as apartment buildings and senior citizens apartment buildings up to a maximum density of 115 units per hectare, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 1.2 metres (north), 6.0 metres (west), 3.0 metres (southwest), and 6.0 metres (southeast), maximum height of 1 to 4 storeys, front face and primary entrance of all dwellings adjacent a public street shall be oriented to the public street, and townhouse blocks shall be a maximum of 8 units in length; **Block 160** - a Residential R5 Special Provision (R5-4( )) Zone to permit townhouses and stacked townhouses up to a maximum density of 40 units per hectare, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 1.0 metre for every 1.0 metres of main building height (north), 3.0 metres (maximum 8.0 metres) (west), 3.0 metres (maximum 8.0 metres) (south), and 3.0 metres (east), minimum landscaped open space of 30%, maximum lot coverage of 30%, maximum height of 2 to 4 storeys, no parking or drive aisles shall be located between a building and the adjacent street line, and where more than one building is developed, the maximum yard depths shall only apply to the building nearest the lot line shared with the street; and, a Residential R9 Special Provision (R9-4( )) Zone to permit such uses as apartment buildings and senior citizens apartment buildings, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 1.0 metre for every 1.0 metres of main building height (north), 3.0 metres (maximum 8.0 metres) (west), 3.0 metres (maximum 8.0 metres) (south), and 3.0 metres (east), maximum height of 2 to 4 storeys, maximum density of 120 units per hectare, no parking or drive aisles shall be located between a building and the adjacent street line, and where more than one building is developed, the maximum yard depths shall only apply to the building nearest the lot line shared with the street; **Block 161** - a Residential R9 Special Provision (R9-7( )) Zone to permit such uses as apartment buildings and senior citizens apartment buildings up to a maximum density of 150 units per hectare, together with a special provision to permit a range of Neighbourhood Shopping Area Commercial uses from the NSA1, NSA2 & NSA5 Zones within the ground floor of a mixed-use building, minimum front, exterior side, interior side and rear yard depths of 1.0 metre (maximum 8.0 metres) (north), 3.0 metres (maximum 8.0 metres) (west), 3.0 metres (maximum 8.0 metres) (south), and 3.0 metres (maximum 8.0 metres) (east), maximum height of 1 to 6 storeys, a maximum of 2000 square metres commercial gross floor area shall be permitted within the zone boundaries, commercial gross floor area shall be confined to portions of the site within 100 metre radius of intersection of Wonderland Road North and Sunningdale Road West, no parking or drive aisles shall be located between a building and the adjacent street line, and where more than one building is developed, the maximum yard depths shall only apply to the building nearest the lot line shared with the street; **Blocks 162 & 163** - a Residential R5 Special Provision (R5-6( )) Zone to permit townhouses and stacked townhouses up to a maximum density of 50 units per hectare, together with a special provision for minimum front, exterior side, interior side and rear yard depths of 6.0 metres (north), 1.5 metres and 3.0 metres (west) for Blocks 162 and 163 respectively, 3.0 metres (south), and 3.0 metres (east), maximum height of 1 to 4 storeys, front face and primary entrance of all dwellings adjacent a public street shall be oriented to the public street, and townhouse blocks shall be a maximum of 8 units in length; **Block 165** – a Residential R1 Special Provision (R1-9( )) Zone to permit single detached dwellings on lots with a minimum lot area of 690 square metres and minimum lot frontage of 18 metres, together with a special provision for an interior side yard for main dwelling of 1.2 metres, except where no private garage is

attached to the dwelling, one yard shall be 3.0 metres; and, a Neighbourhood Facility NF/Community Facility CF1 Zone to permit such uses as elementary schools, secondary schools, private schools, places of worship, and day care centres; **Blocks 167, 168, 169 & 170** – Open Space OS1 to permit such uses as conservation lands, conservation works, golf courses, public and private parks, and recreational buildings associated with conservation lands and public parks; **Block 166** – Open Space OS5 to permit conservation lands, conservation works, passive recreation uses which include hiking trails and multi-use pathways, and managed woodlots..

Responses to the Notice of Application and Publication in "The Londoner"

Dear Corrine Rahman and Larry Mottram,

I, Lauren Fazio and Jose Campos Reales, live at 418 Warner Terrace, London, Ontario, N6G 0E6.

Thank you for your time to discuss my deep concerns and objection for the planning application of Zoning By-Law Amendment 465 Sunningdale Road West. This notice was shocking for our Neiborhood for many reasons, and I would like to focus on 2 main reasons in this letter.

1- Most of us received a confirmation from the developer and the builders of our subdivision which build recently that golf course on the north of Sunningdale will be staying.
We understand that the city of London trying to facilitate developing new houses, however, protection of the house buyers from such behavior should be considered. I was shocked when I came to know from the councilor when I spoke to her that the city of London was aware about this initiative long time ago while the developing company was giving completely different information to the buyers.

2- Instead of facing a golf course, I will be facing mid- or high-rise building. You can imagine the degree of disappointment and the financial loss. This to add to the overcrowded Sunningdale road with multiple high-rise buildings with a very short distance between them. It is going to be a challenge even if this road become wider in the future.

Please note that all the lots in the next phase of Sunningdale are not closed yet, so nobody will receive your notice to respond to it. Even our subdivision is not fully occupied yet. This may affect the number of the objection letters you receive,

At the end, I hope that. City of London will take in consideration the concerns I referred to in this email. I also hope we do not get pushed toward the road of legal actions to challenge this application, the thing that add more stress on the Neiborhood.

Please let me know should you have any question.

Dear Corrine Rahman and Larry Mottram,

I, Qutaiba Tawfic, live at 410 Warner Terrace, London, Ontario, N6G 0E6.

Thank you for your time to discuss my deep concerns and objection for the planning application of Zoning By-Law Amendment 465 Sunningdale Road West. This notice was shocking for our Neiborhood for many reasons, and I would like to focus on 2 main reasons in this letter.

1- Most of us received a confirmation from the developer and the builders of our subdivision which build recently that golf course on the north of Sunningdale will be staying. Personally, my lawyer got such confirmation in this regard from the developing company and the golf course management. The developing company denied any plan for medium or high rise building in the area in the future specifically they were in the process of developing the other part of the golf course east to our subdivision. Simply we paid high price for property close to Sunningdale golf club. The developing company waited till they sold all the south of the golf course before they came up with the new plan. Please find attached recent listing

by the builders for 2 houses on the market now. The same happened when we bought our houses and the developer confirmed what the builders claimed. I trust that this may be considered as a Freud.

We understand that the city of London trying to facilitate developing new houses, however, protection of the house buyers from such behavior should be considered. I was shocked when I came to know from the councilor when I spoke to her that the city of London was aware about this initiative long time ago while the developing company was giving completely different information to the buyers.

2- Instead of facing a golf course, I will be facing mid- or high-rise building, especially my house is facing the block 161. You can Imagin the degree of disappointment and the financial loss. This to add to the overcrowded Sunningdale road with multiple high-rise buildings with a very short distance between them. It is going to be a challenge even if this road become wider in the future.

Please note that all the lots in Sunnungdale court are not closed yet, so nobody will receive your notice to respond to it. Even our subdivision is not fully occupied yet. This may affect the number of the objection letters you receive,

At the end, I hope that. City of London will take in consideration the concerns I referred to in this email. I also hope we do not get pushed toward the road of legal actions to challenge this application, the thing that add more stress on the Neiborhood.
Please let me know should you have any question.

Best,
Dr. Qutaiba Tawfic

Dear Larry.

Thank you for the opportunity to provide input on this proposed development. I live at 2081 Wallingford Avenue, Unit #17.

I understand development is necessary, now more than ever, but I do have concerns with this region of London currently that will be complicated by new construction from my perspective. Here are my concerns with the region as it stands today:

- My backyard backs onto Wonderland Road. The traffic noise and vehicular behaviours around the traffic circle have had an impact on my enjoyment of my backyard. I've raised concerns previously about the speed accelerations of those aggressive drivers coming off the traffic circle, like an elastic band that catapults their vehicles easily touching 80+km/hr. That creates noise. I know the concept of traffic circles reduces accidents and speeds up traffic but it's speeding up traffic in ways the concept didn't design for. We have seen such a huge decline in police traffic controls that is only inviting more of the same behaviour.

- Currently, there are two major construction sites, both on the west side of Wonderland between Fanshawe and Sunningdale, both are creating a substantial amount of new traffic with construction vehicles and illustrating just how impactful construction can be on a neighbourhood.
    - The construction vehicles bring dirt and more noise.
        - The dirt is circulating in the air and coming through my open windows (I'm trying to reduce my air conditioner use for the benefit of the environment), my back patio and windows.
        - I've seen the 'attempt(s)' to clean the roads leaving the construction area and the most recent attempt simply pushed rocks and dirt into the bike lanes making their use practically impossible.
        - Corlon Properties, the same developer proposing the new development, developed the other site here just off Wallingford and they were not responsive in their dirt mitigation attempts. I needed to call several times (city and the developer) to have them clean our roadway as the rocks were accumulating and traffic speeding by were throwing those rocks up

onto the boulevard and on the sidewalks where I walk, 2 times those rocks hit me in the legs. Their responsibilities here shouldn't need neighbours remind them but should be done a regular cadence. If they do develop this new area, they need to be more regimented in this regard.
    - The noise of the construction vehicles coming and going is extraordinary. I've stopped counting at 50 dump trucks that have gone north and south before 1 p.m. today. Those trucks are easily accelerating beyond the speed limits both ways and especially when they are leaving the traffic circle heading south. Regular acceleration is noisy, excessive acceleration is making the enjoyment of my space impossible.

- Drivers heading north on Wonderland, in a desire to avoid the traffic circle, are cutting through our Wallingford neighbourhood to cut over to Sunningdale heading east. These drivers are hitting 60, 70, 80+ KM through the neighbourhood to beat the traffic. Traffic calming measures are needed to mitigate this behaviour on our street today but I'm predicting this behaviour will be exacerbated by the proposed construction.

If this development goes forward, I'm concerned about all the experiences above plus:

- access to retail resources will continue to push traffic into already congested areas south of Sunningdale. There needs to be alternative retail options developed north of Sunningdale ahead of any new residential development.
- Safe access to the new greenspace by residents south of Sunningdale and vice-versa. While there are sidewalks around the traffic circle, crossing the circle as a pedestrian, child or adult, including those with walking devices or wheelchairs, needs to be solved for.
- Sunningdale road needs pedestrian sidewalks and 'safe' bike access as I see many folks navigating those areas which just are not safe currently.
- The traffic circle is too small. It should be expanded like the circle on Sunningdale and Hyde Park. It provides broader space for vehicles.

I would be interested in attending a public meeting should your team decide is warranted.

One last question. Do I have access to see what other submissions community members have made? If yes, how do I access those submissions?

Regards,
Dianne Ebear

Dear Larry Mottram and Corrine Rahman,

I am emailing you in regards to the Notice of Planning Application for 465 Sunningdale Road West, file: 39T-23503 / OZ-9623.

We are the owners of the 97-acre farm on the north west corner of Wonderland Road and Medway Road.

Should our concerns with regards to the **Taylor Drain** be addressed, we would have no objections to this planning application. The **Taylor Drain** is important to the drainage of the farmland. Improvements had been made to this drain to ensure proper drainage, and it functions very well at the present time.

The **Taylor Drain** will be affected by the proposed development. As long as the **Taylor Drain** is not blocked, closed, disturbed, and is properly maintained, and continues to function properly, we have no objections to this planning application. Our only objection to the application would be if the construction development at 465 Sunningdale Road West, impedes the present function of the **Taylor Drain**, in any way.

Thank you, for bringing our concerns with regards to the **Taylor Drain**, to the attention of the applicant, Corlon Properties, and the appropriate engineers and planners.

Sincerely,
Janice and W. Tom Jones

Attention: Planning and Development at the City of London

This email is in regards to the Notice of Planning Application for 465 Sunningdale Road West, file: 39T-23503 / OZ-9623.

I am the owner of the 2 acre property on the north side of Medway Road, just west of Wonderland Road.

Should my concerns with regards to the **Taylor Drain** be addressed, I would have no objections to this planning application.

The **Taylor Drain** is important to the drainage of my home and property. Improvements had been made to this drain to ensure proper drainage, and it functions very well at the present time.

The **Taylor Drain** will be affected by the proposed development. As long as the **Taylor Drain** is not blocked, closed, disturbed, and is properly maintained, and continues to function properly, I would have no objections to this planning application. My only objection to the application will be if the construction development at 465 Sunningdale Road West, impedes the present function of the **Taylor Drain**, in any way.

Thank you, for bringing my concerns with regards to the **Taylor Drain**, to the attention of the applicant, Corlon Properties, and the appropriate engineers and planners.
Sincerely,

Keith Heard
13772 Medway Rd
Arva, ON

Hello,

I noticed this planning application posted on the north side of Sunningdale Rd. this week and after reviewing the details online I have a few comments to share. Thank you for this opportunity.

My comments are related to moving away from the kinds of subdivision design that have dominated the landscape in London and other cities for the past 5 decades, and towards communities that are prepared to handle the weather and climate events that we're already experiencing, that are resilient and ultimately more liveable.

1. I'm glad to see lands set aside for Open Space uses (OS1 and OS5) - I would strongly push for those uses to be more about conservation and natural spaces and less about golf courses and the landscaped parks (featuring large swaths of manicured grass that needs to be maintained) which we know are not climate resistant and in fact add to our carbon footprint. This is an opportunity to allow as much of the space as possible to return to its natural state. Naturalized and conserved spaces are incredibly important as places to connect and learn about the ecosystems to which we belong and they have a deeply positive impact on our mental and physical health. It is worth the effort to protect these spaces properly throughout the construction phase rather than flattening and attempting to re-create them.
2. The same holds for trees. At the start of construction on the subdivision on the south side of Sunningdale Rd. directly across the street from this development, all of the mature trees lining the road were removed – for no reason that I can see, as they would not have interfered with the fence that is currently being built. The value of mature trees as carbon sinks and canopies to lower heat has been proven many times – developers need to be held accountable to making the least impact on

existing trees, especially in areas where there are workarounds available. I would urge the city to make conservation of the trees and natural spaces that exist in the area a compulsory condition of development.

3. Food security is a growing problem, even here in the heart of the country's prime agricultural land. With housing, roads and commercial development taking up more of that land every day, and with extreme weather events and unpredictable weather patterns, growing enough food close enough to home for the growing population here is a serious consideration. Community gardens and urban farms need to be part of every community development that is approved by the city, starting immediately.
4. Our city is far too dependent on personal vehicles for transportation. I didn't see anything in the planning application about how this subdivision, which is currently beyond the boundaries of any LTC bus route, will be connected with any other community or with the shopping centres on Fanshawe Park Road, Hyde Park or Richmond. Along with heavy construction traffic, once the subdivision is finished, hundreds of cars would be traversing a section of the Medway Creek, a significant conservation area that is already under stress from traffic and ongoing construction in the area. It's beyond time to look at building in features like communal forms of transportation and public transportation before approving housing projects.

I would be happy to expand on any of these comments if that would be helpful. I would also appreciate hearing about any public meetings at which this application will be addressed.

Thank you again for the opportunity to provide input.

Regards,
Lella Blumer

Zack & Shannon Amaral
405 Warner Terrace
London, ON N6G 0E6

July 4, 2023

Larry Mottram
Planning & Development
300 Dufferin Avenue
London, ON N6A 4L9
Subject: File: 39T-23503/OZ-9623 Corlon Properties

Dear Larry Mottram,

I hope this letter finds you well. I am writing to express my deep concern and opposition to the proposed subdivision plan that includes high-rise apartments and mixed-use buildings within our community. As a resident and stakeholder, I believe it is crucial to voice my apprehensions regarding this development.

Shame on you Corlon Developments and City of London. Before finalizing our sale of purchase, I inquired with the developer Dave S. numerous times and we were advised NO high-wise apartments. Interesting enough, we receive a letter now that our subdivision complete and the newest subdivision across the golf course is now ALL SOLD. Please tell me why I'm paying double the property tax in comparison to many East of Sunningdale, how is this justified? There are more than enough apartments along this Sunningdale stretch.

First and foremost, the size and scale of the apartments included in the proposed subdivision plan raise several issues that may have a significant impact on the character and quality of our neighborhood. I am worried that this plan may lead to overcrowding and congestion, as the density of the apartments could be disproportionate to the existing infrastructure and amenities.

Additionally, I am concerned about the potential strain on our community's resources, such as schools – St Catherine of Siena, healthcare facilities, and public transportation, as a result of an influx of new residents. The medium to high size apartments might attract a different demographic, potentially altering the fabric of our close-knit community and affecting the peaceful ambiance that we currently enjoy. My children aren't bused and have to walk to and from school due to the high volume and you imagine what it will be like with the proposed plan?

Furthermore, the aesthetics of Sunningdale has become a Brampton. Where is the Forest City? Preserving the unique character of our community is essential, and I worry that the subdivision plan may not adequately consider this aspect.

While I recognize the need for responsible development and affordable housing options, I firmly believe that the proposed plan needs to be reconsidered and modified to better align with the existing neighborhood's values and requirements. As a concerned citizen, I urge the city to consider the opinions and preferences of the community before finalizing any decisions regarding this development.

I respectfully request that a public consultation be organized to allow residents like myself to express their concerns and contribute to a more transparent and collaborative decision-making process. Engaging in meaningful dialogue with the community will not only foster a sense of ownership but also lead to more balanced and well-informed decisions regarding the future of our neighborhood.

In conclusion, I implore the city to reconsider the current subdivision plan containing high and medium size apartments and to involve the community in a thorough and inclusive discussion about the future of our neighborhood. I am confident that together, we can arrive at a solution that respects both the needs of the community and the principles of responsible urban development.

Thank you for your attention to this matter. I look forward to hearing from you and participating in the public consultation process.

Sincerely,

The Amaral's
Zack & Shannon

Significant Agency/Departmental Comments

City of London Ecologist Planner – May 31, 2024

Thank you for circulating the final EIS dated for review and comment. Please address the following items in the next submission.

1. SECTION 3.7.2 – Please update the EIS through addendums, as necessary, according to direction received from MECP related to Bat Habitat loss and any compensatory requirements.

2. SECTION 7.3.1 – Table 7-1 Include only features that will be impacted by the current subdivision development limit as shown on Figure 4-1. Table 7-1 assumes that no further development will take place on the subject lands. Unless the developer intends to protect the retained features in perpetuity, these features should not be included in the totals in Table 7-1 as it is misleading. If the owner intends to protect the features outside the current subdivision limits indefinitely, please disregard this comment.

3. SECTION 12 – Add recommendation to incorporate bird-friendly glass treatments to windows and or deck (glass) railings that face naturalized areas or where they are in proximity to trees.

4. SECTION 12 – Maintaining the naturalized buffer areas and any compensation areas is the responsibility of the Owner until the features are conveyed or assumed by the City. These activities include management for invasive species, maintaining the health and success of restoration/compensation plantings, addressing encroachments, garbage cleanup and overseeding when necessary. Features to be assumed by the City are to be conveyed in a condition that is consistent with the goals of the restoration/compensation plans, including succession of the feature relative to the age of the feature. Please update the recommendations to reflect these responsibilities.

Note: 5 years of monitoring with reports is a recommendation in the EIS and is sufficient. However, the five years does not need to take place consecutively within a 5 year period. It should be noted that the Owner is responsible for management of any naturalized features remaining in their ownership, in perpetuity, and or until the time that the City assumes the features. As such, the 5 years of monitoring should be spaced out over a longer period of time and act as a record of management activities as well as the record of success for the features.

5. GENERAL – As per the direction in the EIS, please submit an Environmental Management Plan that supports the components outlined in the guideline. Note that the reports are to be completed in coordination with detailed design development and included in the IFT design package. Please include the plans as appendices to the EIS.

Upper Thames River Conservation Authority – November 27, 2023

PROPOSAL
A residential draft plan of subdivision is proposed for the subject lands which have an area of approximately 51 hectares. The site is located in North London, on the north side of Sunningdale Road West, east of Wonderland Road North. The lands are currently used for open space and feature a portion of the Sunningdale Golf Course operation.

The proposed development will be comprised of single detached dwellings as well as multiple attached dwellings including townhouses, low-rise apartments and mixed use buildings. The proposed development will also feature a realigned watercourse/complete corridor that will include park and open space, a paved multi-use recreational pathway and stormwater management facilities.

The intent is to redevelop a portion of the golf course lands which are currently designated and zoned “Green Space” and “Open Space” respectively. The applicant is proposing to redesignate the lands as “Neighbourhoods Place Type to permit a variety residential uses. A range of residential zones is requested for the proposed mix of residential uses and various open space zones are also requested.

TECHNICAL REPORTS & COMMENTS
The following technical reports were submitted in support of the Planning Act applications –

i. ***Hydrogeological Report – Sunningdale North – 465 Sunningdale Road West, London, Ontario*** prepared by LDS dated February 28, 2023;

ii. ***Geotechnical Report – Sunningdale North – 465 Sunningdale Road West, London, Ontario*** prepared by LDS dated February 3, 2023;

iii. ***Sunningdale North Environmental Impact Study*** prepared by Ecosystem Recovery dated February 2023;

iv. ***Sunningdale North Stormwater Management and Axford Drain Restoration*** prepared by Ecosystem Recovery dated March, 2023;

v. ***Sunningdale North – Conceptual SWM Facility No. 10 Design*** prepared by LDS dated April 3, 2023; and

vi. ***Final Proposal Report – Sunningdale North*** prepared by Corlon Properties Inc. dated April 6, 2023.

We offer the following comments.

HYDROGEOLOGICAL ASSESSMENT

Hydrogeological Assessment

H1. Section 4.2 notes that "*A continuous broad shallow groundwater aquifer was not identified at the site, since borehole conditions recorded at the site also indicate dry conditions, where no groundwater accumulation or groundwater seepage was observed within the predominantly silt till soils, in the open borehole excavations*". However, except for BH/MW5, shallow groundwater was noted at various depths, from 0.09 m (BH/MW20) above ground surface to 3.67m (BH/MW21) below the ground surface. BH/MW5 is screened from 7.62 to 9.14 m below the ground surface within a deeper sand layer and was reportedly dry during 2020 and 2021. Therefore, the lack of groundwater in the deeper sand layer in this monitoring well is not indicative of uncontinuous groundwater flow within the entire site. Please address.

H2. The locations of the water samples collected from Pond 2 and Pond 3 are not currently marked on any site map. Please identify these locations on a site map for clarity.

H3. According to the EIS (Ecosystem Recovery Inc. February 2023), groundwater indicative species (i.e. watercress) were observed in various locations including Reach WT6, WT7-a, WT8, Reach Tributary A, and Reach Forgotten Creek. A reduction in the groundwater contribution to the Axford Drain and Medway Creek is expected. Are there any anticipated construction and post-development impacts to Axford Drain and Medway Creek resulting from the reduced groundwater infiltration and its contribution to these features?

H4. The screen length (6.1m) for BH/MW6 mentioned in Table 3 does not align with the information provided in the borehole log for BH/MW6. Please revise the corresponding text to reflect the accurate monitoring well construction details.

H5. Have there been any observations of groundwater seepage along the slopes within the property or the golf course to the east of the development?

H6. Upon comparing the chemistry of the surface and groundwater samples, it is evident that the surface water samples from all three ponds exhibit similar chemistry to the groundwater. The groundwater sample collected from 6/MW was obtained from a sand layer below a silt till, which functions as an aquitard. These findings strongly indicate a substantial contribution of groundwater to these ponds as well as Axford Drain and Medway Creek. Consequently, given the presence of groundwater indicator species and the similarities in groundwater and surface water chemistry, it appears that the estimation of groundwater contribution to the existing natural features may not be accurate. Please confirm if this is the case.

H7. Please confirm that the quantity of the post-development runoff water directed towards the Axford Drain and Medway Creek will be sufficient to maintain the downstream natural features at a level similar to the existing conditions.

H8. Please provide the monitoring plan when the detailed design for the development is available.

Water Balance

W1. Under the proposed condition, the water balance shows deficit in the infiltration and increased runoff. The SWM strategy should be revised to consider the deficit in the infiltration.

Stormwater Management – SWM Facility 10

S1. Proposed SWMF 10 is located outside of the limits of the proposed plan of subdivision. The wet pond and the outlet are located within natural hazard lands associated with the Medway Creek valley which is contrary to UTRCA policy. A slope stability/geotechnical analysis will be required to establish the location and design of the proposed SWM infrastructure outside of the natural hazard lands. The erosion hazard limit shall be identified on the design drawings in the SWM report.

S2. In Section 1.1, under the interim condition, it is noted that SWMF 10 can serve a dual function as both a SWM facility for the Sunningdale North development area and as an irrigation reservoir for Sunningdale Golf & Country Club's consolidated golf course facility. The water accumulated in the pond is wastewater and may contain dissolved pollutants. The use of the wastewater in the pond for irrigation purposes may not be suitable. Please address.

Also, the taking of water for irrigation may affect the permanent pool levels in the pond which may impact its operation and performance in providing water quality. Please address.

S3. Please provide details of how the proposed existing storage volumes and daily demands, presented in Table 1, will be incorporated into the design of the proposed pond in addition to the permanent pool volume required for quality control and if it will have any effect on the permanent pool levels.

S4. In Section 1.2, please reference the most recent Geotechnical and Hydrogeological Assessment reports.

S5. In Section 1.3, it is mentioned that "Water Quantity Control Storage - Provide for the safe conveyance of flows to Medway Creek based on the findings of previous studies, no peak flow attenuation for flood control is required". The reported contributing areas to the proposed SWMF 10 is 119 hectares which is a very large area. Also, the cited report is from 1995 and is more than 20 years old. Please consider quantity control.

S6. Section 2.1 mentions that shallow groundwater conditions are typically reported in weathered soils and water-bearing sand seams. Please consider the effects of the groundwater on the proposed SWM infrastructure including the SWM ponds.

S7. Please report on and revise the areas referred to as "C101" and "C102" rather than areas "101" and "102" respectively. The names of the areas in the report should match with the areas shown in the Figures.

S8. Please provide details of how runoff under the major storm events will be conveyed from the proposed interim eastern riprap spillway into the SWMF10 without causing erosion and local flooding issues.

S9. The Curve Number (CN) shown for the areas on Figure 3 do not match with the CN for the same areas presented in Table 4. Please use the correct CN values and revise the modelling accordingly.

S10. In Section 3.5, it is noted that the undeveloped areas will be directed away from the SWM facility and the proposed conveyance system and will flow uncontrolled to the rear of the lots. Please provide more details of how the uncontrolled area will be drained during the interim conditions.

S11. In Section 4.2, it is mentioned that due to the site's topography, a portion of the medium-density residential blocks adjacent to the north and south of SWMF 10 will drain uncontrolled to the existing wooded area, eventually outletting to Medway Creek. Please provide details including the size of the uncontrolled area site.

S12. Please provide details of how under the ultimate development conditions, the minor and major flows from area EX-1 and EX-2 will be conveyed to SWMF10.

S13. Please check the size of areas C201 and C301 under the interim and ultimate conditions respectively. It appears that area C201 is smaller than area C301 as shown on the Figure 3 and 4.

S14. Section 5.3.2 notes an enhanced level of water quality control, based on a wet pond using an imperviousness of 16%, which requires a unit storage volume of 93 m3/ha. The 16% over all imperviousness may not be appropriate given the large, pervious upstream areas. The UTRCA recommends using a volume per unit ha from areas EX-1 and EX-2 and adding that with the volume calculated based on the actual imperviousness under the interim conditions for water quality consideration. The same concept can be used under the proposed ultimate conditions.

S15. The proposed 450 mm diameter conveyance culverts being proposed at 0.6 m above the pond bottom may affect the suspension of the pollutants settling at the bottom of the forebay and may thereby affect the performance of the pond providing water quality. Please address.

S16. In Section 5.4.1 it is mentioned that the SWM basin has been designed to accept the inflow from the OLFR - designed to convey up to the 250-year storm.

The subject lands are regulated by the UTRCA and the regulatory storm is the 250-year storm.

In accordance with Section 6 - Stormwater Management Requirements (p. 6-1) of the ***Design Specifications & Requirements Manual*** prepared by the Corporation of the City of London, dated August 2019 –

The City of London design standards are not exhaustive and ***there may be additional design criteria*** *that emerge through consultation with internal partners…..*

The UTRCA regulatory storm is the 250-year storm. Accordingly, please design the SWM basin to control the 250-year storm.
S17. Please ensure that the SWM report is properly signed, sealed, and dated by P.Eng.

S18. The existing conditions SWMHYMO model schematic provided as Figure 5 may not represent the actual routing of the flows on the site as per Figure 2. Please update the schematic to represent the routing of the flows. Also, please check Figure 7 representing the ultimate conditions.

S19. Please consider the maintenance access road and sediment drying area for proposed SWMF10 and show it on the Drawings.

S20. Please provide details about the fate of the existing irrigation pond in the north.

Sunningdale North Stormwater Management & Axford Drain Restoration
S21. In Section 3.3, it is noted that watercress, which is an indicator species for potential groundwater inputs, was identified in several locations throughout the site, including the existing wetland features and the Axford Drain channel. Please provide details of how the sources of groundwater will be maintained.

S22. In Section 4.2, it is mentioned that water quantity control (peak flow attenuation) is not required for the Medway Creek sub watershed as per the Group 1 Sub watershed study (London, 1995).

Also, in Section 5.2.2, it is noted that similar to the proposed development scenario, water quantity control would not be provided, and that the development would increase peak flows in the Axford Drain. The 1995 studies are more than 20 years old and may not be relevant anymore with the new City standards, hydrology and hydraulics including site conditions. The UTRCA strongly recommends that consideration be given to providing quantity control.

S23. The UTRCA strongly recommends that the proposed 10 metre wide multi-use pathway be located outside of the 250-year flood plain of the Axford Drain. Please consider.

S24. The UTRCA requires a minimum 6 metre setback between the limit of the 250-year flood plain and the limit of the development. Please address.

S25. Figure 5-2 shows proposed SWMF 6C both the East and West Cells located within the 250-year floodplain. The UTRCA does not permit SWM facilities in natural hazards lands. We also do not permit online ponds which are more prone to sediment accumulation during frequent rainfall events specifically during major storm events and may affect the operation of the proposed ponds. Also, the operation and maintenance cost may increase because of more frequent maintenance due to sediment accumulation. Please locate proposed SWMF 6C outside the 250-year floodplain. Also, the proposed SWMF 6C will act as a large pond upstream of the Sunningdale Road with the proposed 1800 x 2400 culvert acting as the only outlet. If the culvert is not sized appropriately to convey the 250-year storm with a free board, this may cause a backwater effect in the pond and within the Drain upstream. Please address.

S26. The HEC RAS model shows approximately 5 metre depth of floodwater under the 250-year storm just upstream of the Sunningdale Road which may be acting as dam holding the flood water. Please consider the effects of the proposed flooding on the stability of the Sunningdale Road.

S27. Please consider the stability of the proposed SWM 6C embankments during the 250-year storm event and recurrent major flows.

S28. The UTRCA strongly recommends that the flows downstream of the Sunningdale Road not be increased in order to avoid erosion and any effects on the toe erosion of the slope downstream. Please address.

S29. Please report the Time to Peak (Tp) for both ponds on the east and west side of Axford Drain.

S30. Table 5-1 shows the proposed stormceptor model with a TSS removal rate of less than the basic requirement. The maximum TSS removal is 49%. The UTRCA strongly recommends using 80% TSS removal by an OGS based on their performance and the absence of operation and maintenance. Please consider an enhanced level with minimum TSS removal of 80%.

S31. In Section 5.5.1.4, it is mentioned that the active storage outlets in each cell will consist of a ditch inlet catch basin and a 300 mm diameter outlet orifice plate to provide partial attenuation of the peak flows up to the 100-year storm event and an overflow spillway will provide discharge for flows greater than the 100-year storm event. The UTRCA regulatory storm is the 250-year storm and as previously noted, we strongly recommend controlling the 250-year storm within the pond.

S32. It is noted that the proposed Axford Drain corridor provides "expanded floodplain storage". Please provide additional details quantifying the pre-development 250 year floodplain storage volumes versus the proposed floodplain storage volumes.

S33. Considering recent development pressures, it is recommended that an additional "Ultimate Development" scenario be considered. What are the impacts on the 250 year flood hazard if the entire Axford Drain watershed is developed?

S34. It is recommended that any proposed structures within the corridor (including the proposed pedestrian bridge) be included in the hydraulic modelling.

S35. Wonderland Road is shown to overtop during the 250 year flood event. Will the flow coming over the road be contained within the downstream proposed Axford drain corridor? Is there potential for spill outside the corridor?

Geotechnical/Slope Stability
G1. In Section 4.3.2, a 4 metre toe erosion component is recommended for the complete realignment of the Drain. The UTRCA strongly recommends that this recommendation be considered for the realigned Axford Drain.

G2. The proposed stable slope inclination of 1.8:1 for cross- section AA is the same as the existing slope inclination shown on the Figure E2. The UTRCA does not agree with the proposed Factor of Safety (FOS) of 1.4 for the slope having the same inclination as the existing slope. Please consider a suitable inclination thus considering the stable slope allowance and stable top of slope.

G3. In our correspondence dated August 28, 2019, the UTRCA provided comments on the ***Geotechnical Report – Sunningdale North 465 Sunningdale Road West, London, Ontario*** prepared by LDS dated April 23, 2019. It does not appear that a response was received. Please address.

Ecology/EIS
As per *Ontario Regulation 596/22* which came into effect on January 1, 2023, Conservation Authorities have been prohibited from providing comments related to natural heritage matters. Accordingly, the UTRCA will not be providing any further natural heritage comments and will defer any responses on outstanding natural heritage matters to the City of London.

Referencing UTRCA's August 28, 2019 comment letter, and Ecosystem Recovery's August 30, 2019 response letter, the final EIS has been reviewed and we offer the following comments:

A. **Deferred**. This comment relates to natural heritage and no further comments will be provided.

B. **Deferred**. This comment relates to natural heritage and no further comments will be provided.

C. **Addressed**. Thank you. Plant species list have been separated by vegetation community in the updated Appendix C.

D. **Addressed**. Thank you. The species list has been provided in Appendix C, and the Floristic Summary Assessment for Study Area has been provided in Table 3-3 for each vegetation community.

E. **Addressed**. Thank you. All vegetation communities are labelled on Figure 3-3 Ecological Land Classification

F. **Acknowledged**. The UTRCA is satisfied that the Hydrogeological Report, prepared by LDS, dated February 28, 2023, has been provided as a part of the submission.

G. **Deferred**. This comment relates to natural heritage and no further comments will be provided.

H. **Deferred**. This comment relates to natural heritage and no further comments will be provided.

I. **Deferred**. This comment relates to natural heritage and no further comments will be provided.

J. **Deferred**. This comment relates to natural heritage and no further comments will be provided.

Clarifications
1. **Addressed**. Thank you. Section 3.6.1 includes the CA Act definition of a wetland. Section 2.2.2 includes 'wetlands' under the definition of regulated features. Regulated status of the individual wetlands has not been discussed in the report, however it is noted in section 4.3.5 that UTRCA must be consulted regarding compensation for removal of any wetlands.
2. **Addressed**. Thank you. The UTRCA is satisfied that the groundwater and surface water contributions for the site are discussed in the hydrogeological report.

3. **Addressed.** Thank you. Section 4.3.5 notes there are 9 individual wetland patches totaling 0.88 ha in size, and 5 man-made ponds having a total area of 1.24 ha with no connectivity to each other. As indicated, the UTRCA is satisfied that the groundwater and surface water contributions are discussed in the hydrogeological report.
4. **Deferred**. This comment relates to natural heritage and no further comments will be provided.
5. **Deferred**. This comment relates to natural heritage and no further comments will be provided.
6. **Deferred**. This comment relates to natural heritage and no further comments will be provided.
7. **Deferred**. This comment relates to natural heritage and no further comments will be provided.
8. **Addressed**. Thank you. The UTRCA is satisfied that the constraints have been identified in section 5.2 of the EIS.
9. **Deferred**. This comment relates to natural heritage and no further comments will be provided.
10. **Not Addressed**. The requested details have not been shown on any of the figures in the EIS. However the UTRCA is satisfied that the list of sensitive plant species is included in section 3.5.2, and the plant species list has been separated by vegetation community in Appendix C.
11. **Deferred**. This comment relates to natural heritage and no further comments will be provided.

Comments from UTRCA's Aquatic Biologist
Deferred. This comment relates to natural heritage and no further comments will be provided.

New Comments on the EIS
E1. Typo: Please note that in Table 2-1, Ontario Regulation 150/06 pertains to the Grand River Conservation Authority. Please revise to Ontario Regulation 157/06 for UTRCA's regulation. The regulation is referenced correctly in Section 2.2.2.

E2. The proposed area of wetland being created (0.24 ha) is less than half of what is being removed (0.514 ha), while the open aquatic area is proposed to be created within the stormwater management ponds. We acknowledge that the created wetland is intended to be of a higher quality and function, however the UTRCA typically does not accept less than a 1:1 replacement ratio for removal of wetlands. Please provide additional justification as to why the proposed channel cannot be widened to provide additional area for wetland compensation.

E3. The Environmental Monitoring Plan should include mitigation measures and subsequent Monitoring Reports should be submitted to UTRCA.

E4. The UTRCA policy does not permit online SWM ponds within natural hazard lands, in this case the flood plain. Please refer to and address the detailed comments on the proposed SWM plan.

SUBDIVISION DESIGN
SD1. The proposed multi-use pathway should be located outside of natural hazard lands, including the 6 metre access allowance associated with the realigned Axford Drain channel.

SD2. The existing golf course access is located within the proposed Block 163. Please confirm how the retained golf course and clubhouse will be accessed under interim buildout conditions.

SECTION 28 PERMIT REQUIREMENTS
P1. A Conservation Authorities Section 28 permit will be required for the proposed subdivision. A separate permit review fee will be communicated at the time of application.

P2. Further details will be required for the pedestrian bridge crossing as part of a future Section 28 permit application. The bridge must be sized to accommodate the 250-yr regulatory flood flows through the realigned Axford Drain corridor.

P3. Erosion and Sediment Control (ESC) measures including detailed ESC drawings with staging, construction timing and sequence of works, rehabilitation/revegetation plan, grading plan, access and construction laydown areas will be required at Detailed Design and for the Section 28 permit approval process. The Engineering Design drawings must clearly indicate how all project works (e.g. development, drainage, grading works, etc.) will conform to the recommendations and mitigation measures outlined in the supporting studies including the Slope Assessment/Geotechnical and other technical submissions.

RECOMMENDATION

Given the outstanding matters, the UTRCA recommends that the application be **deferred**. We request that a response memo/table be submitted to indicate how the comments have been addressed along with the revised reports.

Appendix D – Applicant Responses to UTRCA Comments

No.	UTRCA Comments: Hydrogeological Assessment	Response
H1.	Section 4.2 notes that "*A continuous broad shallow groundwater aquifer was not identified at the site, since borehole conditions recorded at the site also indicate dry conditions, where no groundwater accumulation or groundwater seepage was observed within the predominantly silt till soils, in the open borehole excavations*". However, except for BH/MW5, shallow groundwater was noted at various depths, from 0.09 m (BH/MW20) above ground surface to 3.67m (BH/MW21) below the ground surface. BH/MW5 is screened from 7.62 to 9.14 m below the ground surface within a deeper sand layer and was reportedly dry during 2020 and 2021. Therefore, the lack of groundwater in the deeper sand layer in this monitoring well is not indicative of uncontinuous groundwater flow within the entire site. Please address.	**LDS Consultants Inc.:** In our experience with previous geotechnical and hydrogeological work and inspection and testing services where LDS staff have witnessed open-cut excavations through the Sunninglea development (east of Sunningdale North) and Sunningdale Court (south of Sunningdale North), the soil and groundwater conditions identified in the boreholes and monitoring wells drilled at the site appear very similar. Through those adjacent development projects, groundwater has been encountered intermittently, often in localized sand seams or near-surface weathered soils, and sustained groundwater infiltration from these soils has not been observed. At depth (such as the deep well screen depth at BH/MW5), the deeper sand layer also demonstrates similar characteristics, where both wet and dry conditions have been documented. Based on our experience with the soil and groundwater conditions in the area and the information collected through manual and continuous groundwater measurements at the site, the characterization of the groundwater conditions at the site is considered accurate and appropriate.
H2.	The locations of the water samples collected from Pond 2 and Pond 3 are not currently marked on any site map. Please identify these locations on a site map for clarity.	**LDS Consultants Inc.:** As noted in Section 4.3, the two pond samples were taken at the following locations. In addition, Figure 1 is provided below, showing the sample locations. This information was also provided in September 2019, following a meeting with the City of London and UTRCA staff. • Pond 2: Axford Drain Pond (west) • Pond 3: Axford Drain Pond (east) **Figure 1: Pond Sample Locations**

No.	UTRCA Comments: Hydrogeological Assessment	Response
		
H3.	According to the EIS (Ecosystem Recovery Inc. February 2023), groundwater indicative species (i.e. watercress) were observed in various locations including Reach WT6, WT7-a, WT8, Reach Tributary A, and Reach Forgotten Creek. A reduction in the groundwater contribution to the Axford Drain and Medway Creek is expected. Are there any anticipated construction and post-development impacts to Axford Drain and Medway Creek resulting from the reduced groundwater infiltration and its contribution to these features?	**LDS Consultants Inc.:** The groundwater regime is highly modified by golf course irrigation activities. It is not proposed to replicate the existing groundwater regime. The EIS has determined that groundwater indicative features are not significant and will not be protected. There may be an impact to those features from a loss of groundwater contribution. However, the EIS has determined that the impact is low and proposed mitigation and compensation plan demonstrates an overall net benefit.
H4.	The screen length (6.1m) for BH/MW6 mentioned in Table 3 does not align with the information provided in the borehole log for BH/MW6. Please revise the corresponding text to reflect the accurate monitoring well construction details.	**LDS Consultants Inc.:** Table 3 identifies the screen length as 3.05 m, with the well installation depth at 6.10 m. These same measurements are provided on the borehole log for BH/MW6. It is unclear what discrepancy UTRCA is referring to in their comment.
H5.	Have there been any observations of groundwater seepage along the slopes within the property or the golf course to the east of the development?	**LDS Consultants Inc.:** As noted in the Geotechnical Report (Section 4.1), LDS did not observe seepage areas on the site slopes during the site reconnaissance; however, it is noted that where intermittent water-bearing sandy soils are present, some local seepage would be expected to occur.
H6.	Upon comparing the chemistry of the surface and groundwater samples, it is evident that the surface water samples from all three ponds exhibit similar	**LDS Consultants Inc.:**

No.	UTRCA Comments: Hydrogeological Assessment	Response
	chemistry to the groundwater. The groundwater sample collected from 6/MW was obtained from a sand layer below a silt till, which functions as an aquitard. These findings strongly indicate a substantial contribution of groundwater to these ponds as well as Axford Drain and Medway Creek. Consequently, given the presence of groundwater indicator species and the similarities in groundwater and surface water chemistry, it appears that the estimation of groundwater contribution to the existing natural features may not be accurate. Please confirm if this is the case.	As noted previously, it is important to note that the site is an active golf course with frequent and regular irrigation activities. The site's shallow groundwater and existing surface water features are highly influenced by subsurface tile drains and irrigation systems that are currently and historically functioning throughout the golf course. The proposed mitigation strategy and compensation that demonstrates a net benefit does not include replication of the existing groundwater regime. There may be some adaption of the natural features as a result.
H7.	Please confirm that the quantity of the post development runoff water directed towards the Axford Drain and Medway Creek will be sufficient to maintain the downstream natural features at a level similar to the existing conditions.	**LDS Consultants Inc.:** The impact of the relatively small contribution of the site to the to the quantity of flows in Medway Creek would be insignificant. Water taking from Medway Creek for irrigation purposes will also be reduced. Any change in the quantity of flows in the Axford Drain may result in some adaption of the natural features. However as demonstrated in the EIS the proposed development will result in an overall net benefit. Reduction of infiltration-based baseflow contributions to the Medway Creek and Axford Drain receiving systems downstream of the site will be offset by an increase in run-off directed to both systems contributing to base flows.
H8.	Please provide the monitoring plan when the detailed design for the development is available.	**LDS Consultants Inc.:** Preliminary monitoring recommendations are provided in Section 6.6 of the Hydrogeological Report. In addition, detailed monitoring plans and recommendations are provided in Section 11 of the EIS.

No.	UTRCA Comments: Water Balance	Response
W1.	Under the proposed condition, the water balance shows deficit in the infiltration and increased runoff. The SWM strategy should be revised to consider the deficit in the infiltration.	**LDS Consultants Inc.:** The predominantly silt and silt till soils and areas with perched shallow groundwater are not conducive to the effective functioning of infiltration-based LID structures. Limitations are identified in Section 5.7.1 of the February 2023 Geotechnical Report. To suggest that incorporating these measures for the sake of increasing infiltration-based contributions when site conditions would not allow a beneficial outcome is not appropriate or consistent with sound engineering design. Regardless, as noted in the EIS, replicating the existing water balance contributions is not part of the design criteria, due to the highly influenced contributions associated with the existing golf course operations.

No.	UTRCA Comments: Stormwater Management – SWM Facility 10	Response
S1.	Proposed SWMF 10 is located outside of the limits of the proposed plan of subdivision. The wet pond and the outlet are located within natural hazard lands associated with the Medway Creek valley which is contrary to UTRCA policy. A slope stability/geotechnical analysis will be required to establish the location and design of the proposed SWM infrastructure outside of the natural hazard lands. The erosion hazard limit shall be identified on the design drawings in the SWM report.	**LDS Consultants Inc.:** As noted in the Sunningdale Area Storm Drainage & Stormwater Management Servicing for Undeveloped Land Municipal Class Environmental Assessment (AECOM, 2009), the SWM facility location has been placed in the recommended location per the conclusions and recommendations of that study. The location and orientation of the pond will tie into the surrounding grades and require localized cutting and fill placement to achieve design grades. Through the detailed design of the pond geometry, the design and surrounding natural slope features will be reviewed from a geotechnical standpoint to ensure that stable slope conditions are not adversely impacted or compromised.
S2.	In Section 1.1, under the interim condition, it is noted that SWMF 10 can serve a dual function as both a SWM facility for the Sunningdale North development area and as an irrigation reservoir for Sunningdale Golf & Country Club's consolidated golf course facility. The water accumulated in the pond is wastewater and may contain dissolved pollutants. The use of the wastewater in the pond for irrigation purposed may not be suitable. Please	**LDS Consultants Inc.:** Stormwater run-off is proposed to be directed to SWMF 10 through the stormwater system, including water quality treatment measures (including OGS systems). Groundwater conservation measures support the use of the SWM facility, providing both a stormwater and irrigation function to support continued golf course operations. As illustrated in the SWM report and on Drawing No. 1, the irrigation system's pump intake elevation of 262.58 m is above the elevation corresponding to the required permanent pool

No.	UTRCA Comments: Stormwater Management – SWM Facility 10	Response
	address. Also, the taking of water for irrigation may affect the permanent pool levels in the pond which may impact its operation and performance in providing water quality. Please address.	volume of 6348 m^3 necessary for water quality control. Thus, enhanced water quality is provided as described in the SWM report.
S3.	Please provide details of how the proposed existing storage volumes and daily demands, presented in Table 1, will be incorporated into the design of the proposed pond in addition to the permanent pool volume required for quality control and if it will have any effect on the permanent pool levels.	**LDS Consultants Inc.:** Please see the response to comment S2. Tables 1 and 7 in the SWM report show similar irrigation storage volumes.
S4.	In Section 1.2, please reference the most recent Geotechnical and Hydrogeological Assessment reports.	**LDS Consultants Inc.:** This will be updated in the functional SWM report during the detailed design phase of the project.
S5.	In Section 1.3, it is mentioned that "Water Quantity Control Storage - Provide for the safe conveyance of flows to Medway Creek based on the findings of previous studies, no peak flow attenuation for flood control is required". The reported contributing areas to the proposed SWMF 10 is 119 hectares which is a very large area. Also, the cited report is from 1995 and is more than 20 years old. Please consider quantity control.	**LDS Consultants Inc.:** The Sunningdale Area Storm Drainage & Stormwater Management Servicing for Undeveloped Lands, Municipal Class EA (AECOM, 2009) includes the recommendation that where the natural channel no longer exists and the overland drainage channel will be reconstructed or re-established (i.e. in the western tributary from Wonderland Road through Sunningdale golf course to Sunningdale Road), that peak flow control will not be required as long as the conveyance system is constructed to convey post-development flows. The Sunningdale North SWM and Axford Drain Corridor design is consistent with these recommendations. Hydrologic modelling for the site (refer to Section 6.4.1 of the SWM Report), indicates that peaks flows from the site at the Sunningdale Road outlet will not be increased more than 12% in proposed conditions and 16% in ultimate conditions compared to existing conditions for the 2-year through 250-year events. It is noted that this is a significant improvement to the uncontrolled proposed and ultimate development scenarios.
S6.	Section 2.1 mentions that shallow groundwater	**LDS Consultants Inc.:**

No.	UTRCA Comments: Stormwater Management – SWM Facility 10	Response
	conditions are typically reported in weathered soils and water-bearing sand seams. Please consider the effects of the groundwater on the proposed SWM infrastructure including the SWM ponds.	Please see LDS's response to comments H1 and H5. The Geotechnical and Hydrogeological Reports include provisions for SWM infrastructure, including liners (if site conditions merit using an impermeable liner system) in the SWM facility and trench collars in service trenches. During site servicing, proper construction practices and onsite geotechnical monitoring will be provided to ensure that groundwater interactions are appropriately handled.
S7.	Please report on and revise the areas referred to as "C101" and "C102" rather than areas "101" and "102" respectively. The names of the areas in the report should match with the areas shown in the Figures.	**LDS Consultants Inc.:** Acknowledged. Please note that "C" is a short abbreviation for "catchment." This will be updated in the functional SWM report during the detailed design phase of the project.
S8.	Please provide details of how runoff under the major storm events will be conveyed from the proposed interim eastern riprap spillway into the SWMF10 without causing erosion and local flooding issues.	**LDS Consultants Inc.:** As described in Sections 3.2 and 5.4.1 of the conceptual SWM report, all runoff flows up to the 250-year event will be conveyed to SWMF 10 by the storm sewer (proposed 1800 mm Ø depicted on Sheet No. 3 "Interim Attenuation Basin" within Appendix E of the conceptual SWM report) without creating localized flooding or erosion issues.
S9.	The Curve Number (CN) shown for the areas on Figure 3 do not match with the CN for the same areas presented in Table 4. Please use the correct CN values and revise the modelling accordingly.	**LDS Consultants Inc.:** The CN values in Figure 3 are based on the weighted land cover for the catchment, whereas the values presented in Table 4 represent the pervious landcover for that catchment area.
S10.	In Section 3.5, it is noted that the undeveloped areas will be directed away from the SWM facility and the proposed conveyance system and will flow uncontrolled to the rear of the lots. Please provide more details of how the uncontrolled area will be drained during the interim conditions.	**LDS Consultants Inc.:** This will be determined during the project's construction phase, requiring standard construction methods. Also, water will infiltrate through the topsoil cover and into the weathered near-surface soils; ponding water will evaporate naturally as part of the water cycle.
S11.	In Section 4.2, it is mentioned that due to the site's topography, a portion of the medium-density residential blocks adjacent to the north and south of SWMF 10 will drain uncontrolled to the existing wooded area, eventually outletting to Medway	**LDS Consultants Inc.:** The specific sizing will be determined during the detailed design phase; however, it is anticipated that overland flow will occur through landscaped areas and buffer areas adjacent to the existing wooded area, which is being maintained.

No.	UTRCA Comments: Stormwater Management – SWM Facility 10	Response
	Creek. Please provide details including the size of the uncontrolled area site.	
S12.	Please provide details of how under the ultimate development conditions, the minor and major flows from area EX-1 and EX-2 will be conveyed to SWMF10.	**LDS Consultants Inc.:** This will be determined during the detailed design phase. Catchbasin inlet structures and area grading will convey minor and major flows to SWMF 10.
S13.	Please check the size of areas C201 and C301 under the interim and ultimate conditions respectively. It appears that area C201 is smaller than area C301 as shown on the Figure 3 and 4.	**LDS Consultants Inc.:** The size of areas C201 and C301 under interim and ultimate conditions has been verified.
S14.	Section 5.3.2 notes an enhanced level of water quality control, based on a wet pond using an imperviousness of 16%, which requires a unit storage volume of 93 m3/ha. The 16% over all imperviousness may not be appropriate given the large, pervious upstream areas. The UTRCA recommends using a volume per unit ha from areas EX-1 and EX-2 and adding that with the volume calculated based on the actual imperviousness under the interim conditions for water quality consideration. The same concept can be used under the proposed ultimate conditions.	**LDS Consultants Inc.:** The proposed concept overcomplicates the calculation. LDS is unaware of any technical requirements that justify the need for this approach.
S15.	The proposed 450 mm diameter conveyance culverts being proposed at 0.6 m above the pond bottom may affect the suspension of the pollutants settling at the bottom of the forebay and may thereby affect the performance of the pond providing water quality. Please address.	**LDS Consultants Inc.:** As per the MOE SWM Manual (2003), the pipes set 0.6m above the bottom of the forebay will prevent siphoning.

No.	UTRCA Comments: Stormwater Management – SWM Facility 10	Response
S16.	In Section 5.4.1 it is mentioned that the SWM basin has been designed to accept the inflow from the OLFR - designed to convey up to the 250-year storm. The subject lands are regulated by the UTRCA and the regulatory storm is the 250-year storm. In accordance with Section 6 - Stormwater Management Requirements (p. 6-1) of the ***Design Specifications & Requirements Manual*** prepared by the Corporation of the City of London, dated August 2019 – *The City of London design standards are not exhaustive and **there may be additional design criteria** that emerge through consultation with internal partners….* The UTRCA regulatory storm is the 250-year storm. Accordingly, please design the SWM basin to control the 250-year storm.	**LDS Consultants Inc.:** Control of the 250-year storm is required by neither the City of London SWM Design Requirements, the previous SWM studies including the Group 1 Subwatershed Study, or the Sunningdale SWM EA. In proposed conditions, site flows up to the 250-year storm event will be contained within the SWMF 6C facility and safely conveyed to the Axford Drain corridor. Flood flows for the 250-year event will be conveyed through the proposed Axford Drain corridor with a minimum of 0.5 m freeboard without impact to the adjacent development lands. Designing the SWM facilities to control the 250-year storm event would result in an unnecessarily oversized facility, and is not an effective or efficient land use. Refer to additional comments in the Matrix Response under item S31.
S17.	Please ensure that the SWM report is properly signed, sealed, and dated by P.Eng.	**LDS Consultants Inc.:** Acknowledged.
S18.	The existing conditions SWMHYMO model schematic provided as Figure 5 may not represent the actual routing of the flows on the site as per Figure 2. Please update the schematic to represent the routing of the flows. Also, please check Figure 7 representing the ultimate conditions.	**LDS Consultants Inc.:** Figure 2 illustrates the routing per the SWMHMYO hydrologic model. The figures have been checked, and no issues have been identified. If UTRCA has identified a specific issue or concern, additional information is required to explain their concern.
S19.	Please consider the maintenance access road and sediment drying area for proposed SWMF10 and show it on the Drawings.	**LDS Consultants Inc.:** SWM 10 is proposed to be integrated into the landscape of the existing golf course. As such, no Planning Act approvals have been requested for the lands upon which SWM 10 is proposed or the lands immediately around SWM 10. These lands will remain in the ownership of Sunningdale Golf & Country Club. It is envisioned that the City of London and the golf club will

No.	UTRCA Comments: Stormwater Management – SWM Facility 10	Response
		enter into an Operation and Maintenance Agreement for SWM 10, similar to what existed previously in "Sunningdale West Phase 1" (33M-593) and at the River Bend Golf Club. Additionally, should Planning Act approvals be desired in the future to implement ultimate development conditions, then the appropriate block size to accommodate SWM 10 to provide sediment drying areas will be evaluated at that time. The maintenance access is illustrated in Sheets No. 1 and 4.
S20.	Please provide details about the fate of the existing irrigation pond in the north.	**LDS Consultants Inc.:** The irrigation pond will be decommissioned, which will involve the removal of sediment, inspection of the subgrade, and restoration with structural fill placement under the guidance and direction of the geotechnical engineer. This will include screening and approval of soils proposed for use as structural fill.

No.	UTRCA Comments: Stormwater Management & Axford Drain Restoration	Response
S21.	In Section 3.3, it is noted that watercress, which is an indicator species for potential groundwater inputs, was identified in several locations throughout the site, including the existing wetland features and the Axford Drain channel. Please provide details of how the sources of groundwater will be maintained.	**Matrix Solutions Inc.:** The existing sources of groundwater are the result of a highly managed system established for the purpose of golf course operation. The existing wetland features and the existing Axford Drain through the site are not proposed to be retained. The net natural heritage benefit and compensation for removed features are outlined in the EIS. Accordingly, the sources of groundwater to these features will not be maintained. Reduction of infiltration-based baseflow contributions to the Medway Creek and Axford Drain receiving systems downstream of the site will be offset by an increase in run-off directed to both systems contributing to base flows. In alignment with findings of the hydrogeological assessment and EIS, infiltration-based LID measures are not recommended or proposed as a SWM mechanism to increase infiltration-based contributions.

No.	UTRCA Comments: Stormwater Management & Axford Drain Restoration	Response
		Refer also to hydrogeology/water balance comment response #H3, #H7, and #W1.
S22.	In Section 4.2, it is mentioned that water quantity control (peak flow attenuation) is not required for the Medway Creek sub watershed as per the Group 1 Sub watershed study (London, 1995). Also, in Section 5.2.2, it is noted that similar to the proposed development scenario, water quantity control would not be provided, and that the development would increase peak flows in the Axford Drain. The 1995 studies are more than 20 years old and may not be relevant anymore with the new City standards, hydrology and hydraulics including site conditions. The UTRCA strongly recommends that consideration be given to providing quantity control.	**Matrix Solutions Inc.:** Acknowledged. While it is true that the Group 1 Subwatershed Study (G1SS) is more than 20 years old, its expectations for ultimate development conditions remain generally consistent with current expectations, considering a basin-wide scale. Requirement for quantity control for the Medway Creek tributary lands was not recommended in the G1SS given marginal impact to flooding in the Creek due to the large size of the upstream watershed relative to the size of urbanized areas. It was determined that due to the timing of the peak flows from the upstream rural and downstream urban areas, implementing quantity control in the urban areas could potentially result in increased peak flows and subsequently have an adverse impact on flooding in Medway Creek. More recently, the Sunningdale Area Storm Drainage & Stormwater Management Servicing for Undeveloped Lands, Municipal Class EA (AECOM, 2009) (here referred to as Sunningdale SWM EA) was completed for the City. SWM planning recommendations for the Medway Creek Subwatershed from the G1SS were reviewed in the EA to establish requirements for future development of the subject lands. The EA concluded that: "*In areas where the natural channel no longer exists and the overland drainage channel will be reconstructed or re-established (i.e. in the western tributary from Wonderland Road through Sunningdale golf course to Sunningdale Road), peak flow control will not be required as long as the conveyance system is constructed to convey post-development flows.*" The Sunningdale North SWM and Axford Drain Corridor design is consistent with these recommendations. Hydrologic modelling for the site (refer to Section 6.4.1 of the SWM Report), indicates that peaks flows from the site at the Sunningdale Road outlet will not be increased more than 12% in proposed conditions and 16% in ultimate conditions compared to existing conditions for the 2-year through 250-year events. This is a significant improvement to the uncontrolled proposed and ultimate development scenarios. The proposed development will result in no adverse impact on flooding downstream.
S23.	The UTRCA strongly recommends that the proposed 10 metre wide multi-use pathway be located outside of the 250-year flood plain of the	**Matrix Solutions Inc.:** Acknowledged. As illustrated on Figures 5-2, 5-3, and 5-4, the 10 m multi-use pathway block is located outside the 250-year Regulatory Flood Hazard Limit with 0.5 m Freeboard.

No.	UTRCA Comments: Stormwater Management & Axford Drain Restoration	Response
	Axford Drain. Please consider.	
S24.	The UTRCA requires a minimum 6 metre setback between the limit of the 250-year flood plain and the limit of the development. Please address.	**Matrix Solutions Inc.:** Acknowledged. As illustrated on Figures 5-2, 5-3, and 5-4, a 6 m erosion access allowance is provided outside the 250-year Regulatory Flood Hazard Limit with 0.5 m Freeboard. A minimum 10 m setback is provided between the Flood Hazard Limit and the limit of development.
S25.a)	Figure 5-2 shows proposed SWMF 6C both the East and West Cells located within the 250-year floodplain. The UTRCA does not permit SWM facilities in natural hazards lands.	**Matrix Solutions Inc.:** The proposed SWMF 6C and Axford Drain Corridor designs have been prepared with extensive consideration of current planning practices and developments within the City of London, including guidance for the complete corridor approach in the form of the memorandum titled "Implementation Guidance for Creating a New Complete Corridor in Development Lands" (City of London, 2021) drafted for the Dingman Creek Tributary 12 Complete Corridor. This document has been used to inform the Sunningdale North SWM strategy and design considerations for the Axford Drain corridor, including incorporation of SWMF 6C cells within the natural hazard lands. The complete corridor approach provides the benefit of increased connectivity between Natural Heritage System features and opportunity for construction of stormwater erosion controls within the floodplain rather than in the adjacent table lands. This approach should be seen to provide a net benefit considering ecological, cultural and land use factors. It is noted that the UTRCA EPPM (2017), Section 2.5.3 Guiding Principles includes that natural designs for stormwater management are supported. The proposed complete corridor approach described above is consistent with this UTRCA guiding principle. It is noted that the UTRCA EPPM (2017), Section 3.5.2 indicates that "SWM facilities and associated measures may only be permitted in the flood plain if it can be demonstrated that there is a net public benefit in selecting the flood plain location and if all other potentially viable locations have been dismissed." The following principals have been applied: • Floodplain function has been maintained as demonstrated by the hydraulic analysis included in the supporting documentation. • There is a net environmental benefit as indicated in the supporting EIS.

No.	UTRCA Comments: Stormwater Management & Axford Drain Restoration	Response
		• There is a cultural benefit providing an integrated and aesthetically pleasing natural design for stormwater management.
S25.b)	We also do not permit online ponds which are more prone to sediment accumulation during frequent rainfall events specifically during major storm events and may affect the operation of the proposed ponds. Also, the operation and maintenance cost may increase because of more frequent maintenance due to sediment accumulation. Please locate proposed SWMF 6C outside the 250-year floodplain.	**Matrix Solutions Inc.:** Acknowledged. The SWMF 6C Erosion Control cells are not proposed as online ponds. Stormwater runoff from the proposed development upstream catchments during frequent rainfall events and major storm events up to the 100-year check flow event will be conveyed to the cells. The flows are contained within the Axford Drain corridor grading and are separate to upstream flows. Outflows from the cells are discharged to the Axford Drain low flow channel through the facility outlets and spillways (refer to Table 6-14 of the SWM report). Restoration of the existing Axford Drain channel will provide opportunity to remove existing man-made online ponds from the watercourse and establish a continuous low flow channel following natural channel design principles. The proposed SWMF 6C cells will provide erosion control and water quality enhancement to pre-treated effluent from the upstream storm sewer system, including OGS pre-treatment units. The majority of the maintenance relating to sediment accumulation will occur through cleanout of the OGS units. The SWMF 6C cells are designed with hard-lined maintenance forebays to further reduce future cleanout costs and disturbance to the wetland cells.
S25.c)	Also, the proposed SWMF 6C will act as a large pond upstream of the Sunningdale Road with the proposed 1800 x 2400 culvert acting as the only outlet. If the culvert is not sized appropriately to convey the 250-year storm with a free board, this may cause a backwater effect in the pond and within the Drain upstream. Please address.	**Matrix Solutions Inc.:** Design for the Sunningdale Road culvert is being prepared by AECOM through the Sunningdale Road Improvements Detailed Design. These works will be coordinated in consideration of the modeling and grading efforts for the Sunningdale North development, including flooding elevations for consideration in the Sunningdale Road culvert sizing. Matrix's HEC-RAS modeling for the proposed 1800 x 2400 culvert indicates that the culvert will adequately convey flows from storm events up to the controlled 250-year event in ultimate development conditions, without causing negative backwater effects for the SWMF 6C cells and upstream Axford Drain (refer to Figure 7-8 of the SWM report). The ultimate uncontrolled 250-year event will not overtop Sunningdale Road, though will overtop the SWMF 6C berms and access floodplain storage fully within the corridor limits.
S26.	The HEC RAS model shows approximately 5 metre depth of floodwater under the 250-year storm just	**Matrix Solutions Inc.:**

No.	UTRCA Comments: Stormwater Management & Axford Drain Restoration	Response
	upstream of the Sunningdale Road which may be acting as dam holding the flood water. Please consider the effects of the proposed flooding on the stability of the Sunningdale Road.	Design for the Sunningdale Road embankment is being prepared by AECOM through the Sunningdale Road Improvements Detailed Design. These works will be coordinated in consideration of the modeling and grading efforts for the Sunningdale North development, including flooding elevations for consideration in embankment stability calculations under flooding conditions.
S27.	Please consider the stability of the proposed SWM 6C embankments during the 250-year storm event and recurrent major flows.	**Matrix Solutions Inc.:** Acknowledged. Stability of the SWM 6C embankments will be considered during detailed design
S28.	The UTRCA strongly recommends that the flows downstream of the Sunningdale Road not be increased in order to avoid erosion and any effects on the toe erosion of the slope downstream. Please address.	**Matrix Solutions Inc.:** Acknowledged. Based on erosion assessment of the receiving system the proposed SWM 6C cells provide erosion control storage volumes (230 m3/ha). This exceeds the requirements of the Group 1 Sub Watershed Study (60 m3/ha) to mitigate the increase in flows downstream of Sunningdale Road and associated erosion impacts. Section 6.4.2 of the SWM Report discusses results of the erosion index analysis for existing, proposed development and ultimate development conditions. This analysis demonstrated that any further increase to the provided erosion control storage results in diminishing improvements to erosion conditions in the receiving system. The continuous modelling indicated marginal increases to downstream erosion indices compared to existing (4-6%) with 230 m3/ha erosion control storage provided in the proposed SWM 6C cells.
S29.	Please report the Time to Peak (Tp) for both ponds on the east and west side of Axford Drain.	**Matrix Solutions Inc.:** A table of Tp values for each design storm / duration can be added to the SWM report during functional / detailed design.
S30.	Table 5-1 shows the proposed Stormceptor model with a TSS removal rate of less than the basic requirement. The maximum TSS removal is 49%. The UTRCA strongly recommends using 80% TSS removal by an OGS based on their performance and the absence of operation and maintenance. Please consider an enhanced level with minimum	**Matrix Solutions Inc.:** The proposed water quality control strategy for the development lands draining to SWM 6C involves a treatment train approach consisting of OGS pre-treatment and downstream water quality enhancements through wetland storage in the SWM 6C cells. The TSS removal rates shown in Table 5-1 are estimates of pre-treatment rates based on the CA ETV particle size distribution. This distribution is now required by the City of London and is

No.	UTRCA Comments: Stormwater Management & Axford Drain Restoration	Response
	TSS removal of 80%.	understood to represent more conservative removal rates than the MECP 'fine' distribution. The OGS removal rates have been selected based on optimal efficiency and practicality. Permanent pool storage has been included in wetland cells (Table 5-2) to provide the remaining TSS removal to achieve a combined enhanced level 80% TSS removal for stormwater entering the Axford Drain.
S31.	In Section 5.5.1.4, it is mentioned that the active storage outlets in each cell will consist of a ditch inlet catch basin and a 300 mm diameter outlet orifice plate to provide partial attenuation of the peak flows up to the 100-year storm event and an overflow spillway will provide discharge for flows greater than the 100-year storm event. The UTRCA regulatory storm is the 250-year storm and as previously noted, we strongly recommend controlling the 250-year storm within the pond.	**Matrix Solutions Inc.:** Control of the 250-year storm is required by neither the City of London SWM Design Requirements nor the previous SWM studies including the Group 1 Subwatershed Study and the Sunningdale SWM EA. Peak flows should not increase flood risk, and existing potential flood risk should be mitigated where feasible. The 250-year storm will be conveyed safely to Medway Creek. In proposed conditions, site flows up to the 250-year storm event will be contained within the SWMF 6C facility and safely conveyed to the Axford Drain corridor. Flood flows for the 250-year event will be contained within the proposed Axford Drain corridor with a minimum of 0.5 m freeboard without impact to the adjacent development lands. Designing the SWM facilities to control the 250-year storm event would result in an unnecessarily oversized footprint and restrict use of the land for other beneficial purposes.
S32.	It is noted that the proposed Axford Drain corridor provides "expanded floodplain storage". Please provide additional details quantifying the pre-development 250-year floodplain storage volumes versus the proposed floodplain storage volumes.	**Matrix Solutions Inc.:** The existing Axford Drain channel varies in form including a narrow upstream cross-section, man-made pond features and buried culverts. As a result, the Regulatory Flood in existing conditions overtops the channel and extends broadly at a shallow depth across the tablelands east of Wonderland Road, as illustrated in Figure 7-4 of the SWM Report. The total flooding volume associated with these extents is 30,364 m3 (between Wonderland Road and Sunningdale Road). The proposed Axford Drain Corridor incorporates a widened floodplain to contain the Regulatory Flood with minimum 0.5 m freeboard, in ultimate conditions, as illustrated in Figure 7-9 of the SWM Report. The proposed floodplain storage is 54,075 m3 (including storage above the top of facility elevations for the SWM 6C cells, which is only accessed for the ultimate development uncontrolled 250-year event).
S33.	Considering recent development pressures, it is	**Matrix Solutions Inc.:**

No.	UTRCA Comments: Stormwater Management & Axford Drain Restoration	Response
	recommended that an additional "Ultimate Development" scenario be considered. What are the impacts on the 250-year flood hazard if the entire Axford Drain watershed is developed?	Based on our understanding of long-range land use planning for the Axford Drain watershed and discussions with City London SWED, we find no justification for considering a full watershed development scenario. The external Axford Drain catchments north of the Sunningdale North site boundary are outside of the Urban Growth Boundary and City limits and should not be considered for development within the range of this application, in proposed and ultimate conditions. To ensure all reasonable planning assumptions are considered in the ultimate conditions modelling, Matrix has revisited previous assumptions for the external lands west of Wonderland Road which are currently outside the Urban Growth Boundary but within City limits (existing catchment AXF-2 and portions of SUN-1). These lands were assumed to be developed into residential neighbourhoods (37.4 ha) which convey run-off to SWMF 8E within a central realigned corridor, consistent with the Sunningdale SWM EA and similar in approach to Sunningdale North. A portion of existing agricultural and forest lands was assumed to remain undeveloped in ultimate conditions (AXF-2, 13.5 ha), with the external run-off captured and conveyed to SWMF 8E via storm sewer system. Matrix has revised these assumptions to additionally include development of the remaining AXF-2 catchment into residential neighbourhoods (C= 0.62), maintaining the existing woodland and assuming run-off is conveyed to SWMF 8E via a naturalized corridor between catchments 8E-2 and 8E-3. Results of the updated ultimate conditions modelling indicate a small increase in uncontrolled 250-year flood flows (16.1 m^3/s vs 15.5 m^3/s at Wonderland Road), resulting in a maximum increase of 3 cm to the Regulatory Flood elevation in the corridor. **This presents no impacts to the proposed Axford Drain Corridor limits as flood levels continue to be safely contained in the corridor grading.** The update results in no adverse impacts to downstream flooding conditions, and the ultimate Sunningdale Road culvert is not overtopped by the Regulatory event. In more the frequent events, increased runoff from the developed catchments can be offset by increased level of erosion control storage at SWMF 8E to account for the increased runoff volumes. The SWM Report will be revised during functional design to include the updated model results.
S34.	It is recommended that any proposed structures within the corridor (including the proposed	**Matrix Solutions Inc.:**

No.	UTRCA Comments: Stormwater Management & Axford Drain Restoration	Response
	pedestrian bridge) be included in the hydraulic modelling.	Acknowledged. Details for the proposed pedestrian bridge crossing over the Axford Drain Corridor have not yet been established but will be considered in subsequent modelling updates to support detailed design.
S35.	Wonderland Road is shown to overtop during the 250-year flood event. Will the flow coming over the road be contained within the downstream proposed Axford drain corridor? Is there potential for spill outside the corridor?	**Matrix Solutions Inc.:** The proposed Axford Drain Corridor design does not include upsizing of the Wonderland Road culvert; thus, overtopping conditions associated with capacity of the culvert will remain as in existing conditions. The hydraulic models for the Axford Drain Corridor between Wonderland and Sunningdale assume that all flow spilling over the culvert is conveyed downstream within the corridor. Final grading for the development lands will ensure spills from the culvert for flows up to the 250-year event are safety conveyed towards Axford Drain and contained within the corridor. Future improvements to Wonderland Road should have consideration for capacity improvements to the culvert and appropriate grading to contain spills within the corridor.

No.	UTRCA Comments: Geotechnical/Slope Stability	Response
G1.	In Section 4.3.2, a 4-metre toe erosion component is recommended for the complete realignment of the Drain. The UTRCA strongly recommends that this recommendation be considered for the realigned Axford Drain.	**LDS Consultants Inc.:** Acknowledged. **Matrix Solutions.:** The realigned Axford Drain includes a meander belt allowance and natural channel design that has been developed in consultation with water resources engineers, fluvial geomorphologist that consider toe erosion. Toe erosion has been captured in the design.
G2.	The proposed stable slope inclination of 1.8:1 for cross- section AA is the same as the existing slope inclination shown on the Figure E2. The UTRCA does not agree with the proposed Factor of Safety	**LDS Consultants Inc.:**

No.	UTRCA Comments: Geotechnical/Slope Stability	Response
	(FOS) of 1.4 for the slope having the same inclination as the existing slope. Please consider a suitable inclination thus considering the stable slope allowance and stable top of slope.	Acknowledged. The report identifies that as part of the reconfiguration and realignment of the Axford Drain, the final grading design will be reviewed to assess the stable slope configuration and any applicable setbacks which are required.
G3.	In our correspondence dated August 28, 2019, the UTRCA provided comments on the ***Geotechnical Report – Sunningdale North 465 Sunningdale Road West, London, Ontario*** prepared by LDS dated April 23, 2019. It does not appear that a response was received. Please address.	**LDS Consultants Inc.:** The comments provided on August 28, 2019, and correspondence were reviewed, and appropriate updates and additional comments were provided in preparing the more recent Geotechnical Report issued in February 2023. However, to facilitate UTRCA review in the context of their previous comments, excerpts from UTRCA's August 28, 2019 letter are provided below, along with LDS Response comments G3.1 – G3.10.
G3.1	The UTRCA strongly recommends that a Hydrologic and Hydraulic model be prepared for the Axford Drain if the area west of Wonderland Road to the culvert upstream is greater than 120 ha in order to identify the width of the 250-year flood plain and its elevation across the property.	**LDS Consultants Inc.:** Hydrologic and Hydraulic modelling of the Axford Drain is outside of the scope of LDS' geotechnical assessment for the site. As part of the geomorphologic review and assessment of the Axford Drain, Matrix has carried out hydraulic modelling in the conceptual design of the reconstructed Axford Drain corridor.
G3.2	The MNR rating chart for cross-section C-C is titled *Slope Stability Rating chart 6*. Please correct the name of the cross-section on the MNR chart.	**LDS Consultants Inc.:** The MNR Rating Chart (in Appendix D of the February 2023 report) for Cross Section C-C is correctly labelled.
G3.3	Appendix A has 4 figures. Please revise.	**LDS Consultants Inc.:** Refer to Appendix E of the February 2023 report for the most recent Slope Stability figures.
G3.4	In Section 4.1, it is mentioned that "the survey included a detailed review and observations of vegetation, seepage zones, sloughing and surface erosion, and included a survey of three cross sections". The MNR rating chart however reported a score of zero for seepage which means no seepage for all the cross-sections that were considered for the site. Please confirm whether seepage was observed and also report the seepage location(s).	**LDS Consultants Inc.:** As noted under comment H5, LDS did not observe seepage areas on the site slopes during the site reconnaissance – this is consistent with the values assigned to the presence of seepage in the slope rating chart. However, in the discussion of the slope stability analysis presented in the February 2023 report, it is noted that some local seepage would be expected to occur where intermittent water-bearing sandy soils are present. As such, localized groundwater seepage was incorporated into the analysis, establishing the stable slope geometry.

No.	UTRCA Comments: Geotechnical/Slope Stability	Response
	The UTRCA also recommends that seepage be considered in the Factor of Safety (FOS) analysis for the stable slope.	
G3.5	Cross-sections A-A, B-B AND C-C only show half of the valley/one side of the creek. Please extend the cross-sections so that they cover the entire creek valley in order to establish the development limit.	**LDS Consultants Inc.:** The critical sections are included in the cross sections, where the steepest sections of the slopes have been documented onsite and verified through the topographic data. A full valley profile is not required to determine the development setback limits, as the current analysis has utilized the worst-case scenarios. Furthermore, it is noted that the valley slopes along the Axford Drain will be reconstructed as part of the Axford Drain corridor enhancements. The setbacks will be based on the reconstructed slopes, not the existing slopes, which are expected to be reconfigured. It is not appropriate to establish setbacks based on slopes that will not exist in their current form since the valley lands associated with the drain alignment are being reconfigured.
G3.6	The creek enters the site from the west, exits in the south and appears to be an unconfined system in the upstream reach, becoming what appears to be a confined system just upstream of Sunningdale Road. Please consider the meandering of the creek where it is not confined and a stable slope analysis for reaches which are confined.	**LDS Consultants Inc.:** As noted above, these comments are no longer appropriate, given the intended reconstruction and reconfiguration of the Axford Drain corridor. Meandering considerations have been incorporated into the geomorphological review of the drain and considered with the conceptual design of the corridor realignment.
G3.7	On Page 13, it is mentioned that "if the slope can be graded to a gentler inclination in the range of 1.8H : 1.0V or more gently inclined, a stable slope setback would not be applicable". The UTRCA does not agree with this statement. Please identify the top of the stable slope and apply a 6 metre erosion access limit as per the MNR guideline and UTRCA policy.	**LDS Consultants Inc.:** Acknowledged – however, the current version of the report identifies that as part of the reconfiguration and realignment of the Axford Drain, the final grading design will be reviewed to assess the stable slope configuration and any applicable setbacks which are required.
G3.8	In Section 4.3.2, it is indicated that a 2 metre toe erosion allowance is considered appropriate however, cross-sections A-A, B-B and C-C show that the toe of the slope is located more than 15 meters from the bank of the Creek. Please explain.	**LDS Consultants Inc.:** In the February 2023 report, the new complete corridor is expected to have a toe erosion setback of 4 m along each channel side. This exceeds the previously noted 2 m setback, which was identified for the current condition of the Axford Drain since the corridor will not have the same piped restraints to the flow capacity in the new corridor configuration. Where the new

No.	UTRCA Comments: Geotechnical/Slope Stability	Response
		corridor is not located in a valley, the erosion hazard will be defined by the meander belt, as outlined through the Geomorphic Report by Matrix (formerly Ecosystems Recovery Inc.).
G3.9	Please resubmit Drawing Plan Sheet No E1 supported by contour information as a full size drawing having a suitable scale. The submitted drawing says NTS (Not to Scale) which makes it difficult to compare the various slope components with the submitted cross-sections.	**LDS Consultants Inc.:** Drawing E1 in the February 2023 report has topographic contours included, and a scale bar is provided on the drawing for reference.
G3.10	Please resubmit cross-sections A-A, B-B and C-C signed, sealed and dated by P.Eng.	**LDS Consultants Inc.:** The cross-section drawings provided in the February 2023 report are sealed and signed by an engineer.

No.	UTRCA Comments: Ecology/EIS	Response
Clarifications 10.	**Not Addressed**. The requested details have not been shown on any of the figures in the EIS. However, the UTRCA is satisfied that the list of sensitive plant species is included in section 3.5.2, and the plant species list has been separated by vegetation community in Appendix C.	**Matrix Solutions Inc.:** Matrix has incorporated a figure with the locations of sensitive plant species within the revised EIS.
E1.	Typo: Please note that in Table 2-1, Ontario Regulation 150/06 pertains to the Grand River Conservation Authority. Please revise to Ontario Regulation 157/06 for UTRCA's regulation. The regulation is referenced correctly in Section 2.2.2.	**Matrix Solutions Inc.:** Acknowledged, the EIS text has been revised with the correct reference.
E2.	The proposed area of wetland being created (0.24 ha) is less than half of what is being removed (0.514 ha), while the open aquatic area is proposed to be created within the stormwater	**Matrix Solutions Inc.:** The proposed Axford Drain corridor compensation features have been revised in the EIS text and figures to reflect a 1:1 aerial replacement ratio for removed wetlands. The proposed

No.	UTRCA Comments: Ecology/EIS	Response
	management ponds. We acknowledge that the created wetland is intended to be of a higher quality and function, however the UTRCA typically does not accept less than a 1:1 replacement ratio for removal of wetlands. Please provide additional justification as to why the proposed channel cannot be widened to provide additional area for wetland compensation.	SWM features within the Axford Drain Corridor and the proposed SWMF10 have been removed from the compensation calculations.
E3.	The Environmental Monitoring Plan should include mitigation measures and subsequent Monitoring Reports should be submitted to UTRCA.	**Matrix Solutions Inc.:** Acknowledged and the revised EIS has been updated to include mitigation measures and outlines that monitoring reports will be submitted to UTRCA in Recommendation 11.
E4.	The UTRCA policy does not permit online SWM ponds within natural hazard lands, in this case the flood plain. Please refer to and address the detailed comments on the proposed SWM plan.	**Matrix Solutions Inc.:** Please refer to SWM comment response #S25 b) above.

No.	UTRCA Comments: Subdivision Design	Response
SD1.	The proposed multi-use pathway should be located outside of natural hazard lands, including the 6-metre access allowance associated with the realigned Axford Drain channel.	**Matrix Solutions Inc.:** The location of the proposed multi-use pathway has been established with consideration to previous consultation with the City and UTRCA (incl. comments from the November 26, 2019 project update meeting). The proposed pathway is located outside the 250-year Regulatory Flood Hazard Limit with 0.5 m freeboard and is proposed to meander within the 10 m top of slope setback, which incorporates the required 6 m erosion access allowance. Encroachment of the multi-use pathway into the erosion access allowance would not restrict emergency/maintenance access to the slope for purposes outlined in Section 3.4 of the MNRF Erosion Hazard Limit Technical Guide and should thus be considered an appropriate use of the space.
SD2.	The existing golf course access is located within the proposed Block 163. Please confirm how the	**LDS Consultants Inc.:**

No.	UTRCA Comments: Subdivision Design	Response
	retained golf course and clubhouse will be accessed under interim buildout conditions.	The existing entrance will remain until Block 163 is developed as part of the phasing of the subdivision. Subsequently, a new golf course access will be created from Street 'D'.

No.	UTRCA Comments: Section 28 Permit Requirements	Response
P1.	A Conservation Authorities Section 28 permit will be required for the proposed subdivision. A separate permit review fee will be communicated at the time of application.	**LDS Consultants Inc.:** Acknowledged.
P2.	Further details will be required for the pedestrian bridge crossing as part of a future Section 28 permit application. The bridge must be sized to accommodate the 250-yr regulatory flood flows through the realigned Axford Drain corridor.	**Matrix Solutions Inc.:** Acknowledged. Details for the proposed pedestrian bridge crossing over the Axford Drain corridor will be developed through detailed design, including consideration of flood flow modelling. These details will be provided to support a future Section 28 permit application.
P3.	Erosion and Sediment Control (ESC) measures including detailed ESC drawings with staging, construction timing and sequence of works, rehabilitation/revegetation plan, grading plan, access and construction laydown areas will be required at Detailed Design and for the Section 28 permit approval process. The Engineering Design drawings must clearly indicate how all project works (e.g. development, drainage, grading works, etc.) will conform to the recommendations and mitigation measures outlined in the supporting studies including the Slope Assessment/Geotechnical and other technical submissions.	**LDS Consultants Inc.:** Acknowledged.

Appendix E – Applicant Responses to ECAC Comments

May 1, 2024

Sandy Levin

Chair of the Ecological Community Advisory Committee

Dear Mr. Levin,

Corlon Properties Inc. received the Ecological Community Advisory Committee (ECAC) comments on August 15, 2023 in response to their review of:

- Hydrogeological Report – Sunningdale North – 465 Sunningdale Road West, London, Ontario prepared by LDS dated February 28, 2023;
- Sunningdale North Environmental Impact Study prepared by Ecosystem Recovery dated February 2023;

We have reviewed the comments/concerns provided by ECAC and have prepared the responses below as they pertain to the Sunningdale North Hydrogeological and EIS reports.

Corlon Properties Sunningdale North
465 Sunningdale Road West (Sunningdale North Subdivision) File No. 39T-23503

ECAC Comment	Response
Draft Plan of Subdivision not complete at this time. Geotechnical Investigation Report not received. Stormwater study not received.	Complete Planning Act applications package (including draft plan of subdivision, Geotechnical Report, and Stormwater Management Reports) submitted to the City of London on April 6, 2023.
Hydrogeological Report from LDS February 2023 and Ecosystem Recovery EIS February 2023 received by ECAC by email from file planner after June 2023 meeting.	Acknowledged.
Reviewed by S. Evans, S. Hall, S. Levin and submitted to ECAC meeting of August 17, 2023	Acknowledged.

SUMMARY RECOMMENDATION

ECAC Comment	Response
There are many recommendations in the Hydrogeological Report (LDS) and the EIS.	Acknowledged.
All must be conditions to draft plan approval. This will provide the City of London the authority to ensure that such recommendations are implemented before final plan approval is granted.	We look forward to working with the City of London on the finalization of the conditions of draft approval. Through this process, we are confident that the City of London will ensure that all recommendations of the approved EIS are included as conditions of draft approval, as appropriate, to appropriately obligate the Owner / Applicant to fulfill all prior to final approval.

KEY ISSUE

ECAC Comment	Response
Does the Axford Drain naturalization project provide for no net	Section 13 (Conclusion) of the EIS (Ecosystem Recovery Inc,

ECAC Comment	Response
loss of ecological features and functions?	February 2023) indicated that: *Based on the above evaluations of the aquatic and terrestrial environments, the Sunningdale North Development will result in the loss of habitat of low ecological value given its disturbed and anthropogenically influenced setting and will not result in a net negative impact. The loss of habitat and vegetation communities can be mitigated through the planting of native trees, shrubs and herbaceous species along the Axford Drain corridor maintaining the overall habitat coverage and ecological function for any resident wildlife. With the implementation of the proposed mitigation and the realignment/naturalization of the Axford Drain corridor, a net environmental benefit is anticipated as a result of the proposed works.* Additionally, the EIS net effects calculation and compensation plan have been revised to incorporate feedback received from Grounded Solutions and UTRCA. In the revised EIS, wetland compensation will be 1:1 and woodland compensation greater than 1:1 as part of the Axford Drain Corridor design.
ECAC is of the opinion that there are benefits although it is unconvinced there will be no net loss of ecological functions over time.	The EIS was completed based upon an Issues Summary Checklist Report prepared with the City of London. Numerous discussions, including a site visit, were completed with the City of London and the UTRCA to discuss the subject lands and realignment / recreation of the complete Axford Drain corridor concept. From a very high-level conceptual perspective, all parties are on board with the approach (contingent upon the completion of the field work findings and completion of the EIS) of removing small, low quality natural heritage features that have been highly disturbed and anthropogenically influenced as a result of the presence of the golf course for the past seventy (70) plus years, in favour of recreating a new, continuous corridor in association with the Axford Drain. We have

ECAC Comment	Response
	addressed review comments received from the City of London (Grounded Solutions, October 10, 2023) and the UTRCA (November 28, 2023), it does not appear that the City and UTRCA believe that a net loss will result in what is proposed.

RECOMMENDATION #1

ECAC Comment	Response
ECAC supports requiring a detailed Environmental Management Plan as a condition of approval of the draft plan. The plan must be approved by a City Ecologist and the UTRCA as part of the approval process.	An Environmental Management Plan has been developed, including a Wildlife Management Plan and is being submitted for approval. As such, we are in support that this recommendation and all others be carried forward as a condition of draft approval.
As per page 59 of the EIS "The detailed plan will identify the plant species selection, location and quantities to be planted within the Axford Drain corridor and will include wildlife habitat creation."	Acknowledged.
As per Page 39 LDS, elements of an Environmental Management Plan are outlined: "An environmental monitoring program will be prepared, to help ensure that site activities during construction, and in post-development conditions do not have a detrimental impact to natural heritage features, from an ecological and hydrologic perspective. The main objectives of the Environmental Monitoring Plan are expected to include: ▪ Providing an early indication should any environmental control measures (such as sediment and erosion ▪ control measures) or practices fail to achieve prescribed	All acknowledged. Page 39 of the Hydrogeological Report (LDS, February 2023) outlines the main objectives of an Environmental Monitoring Plan, as it related to Sediment and Erosion Control. We would anticipate a condition of draft plan approval that would require the submission of Erosion and Sediment Control monitoring reports (including turbidity measurements for stormwater runoff, where appropriate) are to be submitted to the City on April 1, July 1 and November 1 of each year until all works and services in this Plan are assumed by the City.

ECAC Comment	Response
standards; ▪ Monitoring the performance and effectiveness of mitigation measures; ▪ Determining project compliance with regulatory requirements and standards and outlining reporting ▪ requirements, including timing and distribution; ▪ Identifying an emergency contact list and response protocol to respond to any issues or concerns ▪ identified during construction; and, ▪ Taking remedial actions if unexpected problems or unacceptable interference or negative impacts arise. From a preliminary standpoint, the following comments are provided regarding monitoring efforts which are expected to be confirmed and refined as detailed design information becomes available. The Monitoring Plan should be prepared by a Qualified Person (QP) and periodically reassessed and updated by the QP, as appropriate, to ensure that the objectives stated above are effectively and efficiently achieved".	

BACKGROUND

ECAC Comment	Response
The existing Axford Drain which crosses through the southwest part of the site (currently in a closed piped system) is expected to be reconstructed and enhanced through the proposed development, and set within a constructed corridor, which will also incorporate stormwater management features which will help to contribute base flows to the reconstructed drain alignment. Drawing 2, in Appendix A of LDS shows the Draft Plan	Acknowledged.

of Subdivision.	
The future development area will include the future stormwater management facility, identified as SWMF10, expected to convey flows to Medway Creek.	Acknowledged.

COMMENT

ECAC Comment	Response
It is encouraging to see the proposed daylighting and renaturalization along a 30 m corridor as it will be an amenity for new residents (likely allowing for a higher demand for lots) as well as better for the ecosystem. ECAC is encouraged by the opportunities outlined in the EIS on page 55.	The complete Axford Drain corridor, as proposed within the EIS will vary in width from 62.5 meters to 110.8 meters (as per Figures 6-3 and 6-4 of the EIS). Section 5 of the EIS outlines numerous elements / opportunities to deliver a net benefit to the existing degraded corridor by reconstructing, realigning and natural channel restoration of the Axford Drain
It was interesting to note that the presence (page 42, EIS) of watercress during the field work. Watercress is an indicator of groundwater inputs.	Acknowledged.

RECOMMENDATION #2

ECAC Comment	Response
If at all possible utilize these locations as part of the location decision of how best to improve the watercourse post development.	It is unclear as to what this ECAC comment is referring to.

OBSERVATION

ECAC Comment	Response
We do point out that some recent alteration (c. 2013-4) to the watercourse seems to have taken place without authorization that appear to have purposefully prohibited upstream fish	The observation outlined below (excerpt from Sunningdale Road EA), indicates that "there has been some recent construction to the drain and receiving watercourse". This was work completed

ECAC Comment	Response
movement. See extract following from the Sunningdale Road EA. ECAC hopes the works planned for the watercourse do result in a net benefit.	by the City of London, some years ago, as a large storm event created problems with this culvert and Sunningdale Road.
From Road EA *3.2.2.3 Axford/McCallum Drain* "The Axford Drain is described as an intermittent watercourse. The drain follows a south easterly direction before flowing into Medway Creek. The section of the drain in the Study Area runs primarily through rural and agricultural land uses including a golf course. Upstream of Sunningdale Road, the drain runs through an underground channelized system before opening into a plunge pool. There is no direct fish habitat noted upstream of Sunningdale Road. The drain flows underneath Sunningdale Road through a culvert into a plunge pool located at the perched outlet, which represents a barrier to upstream fish movement. Observations indicate there has been some recent construction to the drain and receiving watercourse. A new culvert and riprap channel have been constructed, including a rock berm which purposefully prohibits fish movement upstream. The channel flows south through a narrow grassy cattail channel. There is evidence of erosion near the culvert as well as approximately 10 m downstream of the culvert along the left bank facing upstream. The downstream section of the Axford/McCallum Drain provides little to no direct fish habitat." (It is interesting to note that according to page 44 of the EIS, the Drain does contain direct fish habitat).	Section 3.13.3 of the EIS outlines the findings of the aquatic assessment completed on the Axford Drain. Reach WT6 starts 185 m downstream of Sunningdale Road and extends to the perched culvert under Sunningdale Road and is a total length of 278 m. Fish and minnow species were noted in the pool just below the perched culvert under Sunningdale Road. Upstream, in addition to this perched culvert, there are many barriers to fish passage. No fish were visible during the assessment, within the reaches upstream of the culvert under Sunningdale Road. As previously mentioned, (above) the City of London completed some work on this culvert, some years ago, as a large storm event created problems with Sunningdale Road.

CULVERT AT SUNNINGDALE ROAD – TIMING OF CONSTRUCTION

ECAC Comment	Response
The Sunningdale Road EA is also relevant to this subdivision as the Axford Drain Corridor Plan drawing in the EIS (Figure 6-2) refers to the box culvert under Sunningdale being improved as part of detail design. PROPOSED 1800x2400mm BOX CULVERT UNDER SUNNINGDALE ROAD TO BE CONFIRMED PER SUNNGINGDALE ROAD IMPROVEMENTS DETAILED DESIGN (AECOM).	All acknowledged. The City's Sunningdale Road widening project (anticipated to occur in 2025) will replace the existing culvert.
LDS p. 3 also notes that: "The existing culvert crossing at Sunningdale Road is set approximately 20 cm above the bottom of the watercourse channel on the south side of the culvert. Although improvements to the Sunningdale Road culvert crossing are expected, it is currently anticipated that flows will be conveyed through a box culvert, and that the culvert elevation will not change significantly, due to potential conflicts with existing services which extend along Sunningdale Road, including high-pressure gas and a large- diameter watermain." This begs the question which comes first, the road works or the subdivision? And if the subdivision goes first, will the proponent be required to install the box culvert as part of the watercourse works?	Presently, it is our understanding that the Sunningdale Road widening project is anticipated to proceed in 2025. Considering this, it is highly unlikely that a first phase of this subdivision will occur before the road widening / culvert replacement, as draft approval has yet to be achieved. Notwithstanding this, conditions of draft approval will ensure that the City and the Owner / Applicant work cooperatively to implement the necessary works and services that are required in a timely manner. Should the box culvert need to be installed as part of the subdivision, then the City will confirm that these works are fully claimable, pursuant to the Development Charges By-law.

RECOMMENDATION #3

ECAC Comment	Response
City staff clarify timing and responsibilities for the proposed box culvert work.	Acknowledged.
ECAC supports rec 11 page 88 of the EIS regarding the need for exclusionary fencing of this culvert.	Acknowledged.

CONSTRUCTION IMPACTS

ECAC Comment	Response
ECAC would hope that construction will manage stormwater better than was done at one point in the development on the south side of Sunningdale Road. The following is from a March 2022 communication to city staff, via an ECAC member, from citizens who were walking along the multi-use path. A link to a brief video is also included. "They have built a culvert on the side of the hill close to walkway bridge closest to the Sunningdale parking lot). The pipes etc., have likely not been connected yet (i think), so I was shocked to see runoff of water and mud cascading down the hill, right next to the concrete culvert, straight into Medway Creek. The creek is now being flooded by a lot of muddy water which cannot be good for the water and for life in the creek." https://drive.google.com/file/d/1j8QvqkvOl2XBWJrHzdZ73rEeZE8F4uiU/view There is always a requirement to stop work while active construction dewatering results in increased turbidity. The question is whether monitoring occurs and if so, who does it. And does it result in a halt in activity when such halts are costly?	While unrelated to ECAC's review of the Sunningdale North EIS, the development (on the south side of Sunningdale Road) mentioned above, has all approved sediment and erosion control (SEC) measures in place, during the storm event referenced. It is not accurate to presume that performance issues identified in the comments above where solely reported by members of the public and/or ECAC members, when the contractor and consultant had already identified the issues and were in discussions on remedial measures, and effective timing to carry out said work. SEC measures are designed for typical design storm events, and may, on occasion, become overwhelmed on both private and public development / infrastructure projects during prolonged rain events. Also, the description that "water and mud" was "cascading down the hill…straight into the Medway Creek", does not accurately reflect the fact that numerous / various SEC measures were in place to intercept, divert and partially filter stormwater run-off, and that they were unfortunately overwhelmed due the magnitude and duration of this particular storm event. Monitoring reports with a log of dates when the facilities were inspected (during each storm event), the condition of the facilities at that time, and what remedial action, if any, was

ECAC Comment	Response
	needed and taken are submitted to the City on April 1, July 1, and November 1 of each year until all works and services are assumed by the City. Inspections are carried out by consulting staff with CISEC training. The Owner shall correct any deficiencies of the erosion and sediment control measures forthwith. In addition, immediate communication occurs between the proponents' consultants, City of London and UTRCA staff, during or immediately following storm events which exceed the SEC measures capabilities. As a result, deficiencies within the approved SEC measures are corrected and enhanced SEC measures are prescribed and implemented.

RECOMMENDATION #4

ECAC Comment	Response
ECAC encourages the city to have more site inspections given this site will not be as easily observable by the public.	The proponents consulting engineers are independent professionals who monitor all site conditions through construction with specific attention being provided during storm events. Suggesting that monitoring by the public is required, overstates the significance of the supplemental review function performed by casual observers and lay people. Between the independent professionals and the City of London's Planning and Development, Development Inspections, standard inspection processes are in place, for this proposed development and all developments, to ensure that approved SEC measures are established, maintained, and enhanced, as appropriate.
Page 33 of LDS has a number of related recommendations that ECAC supports "Temporary short-term diversions are anticipated as work is	Acknowledged. The detailed engineer design drawings will include the appropriate / necessary sediment and erosion control (SEC) measures, consistent with the Ministry of Natural Resources Guidelines on Erosion and Sediment Control for

ECAC Comment	Response
undertaken to replace piped sections of the drain into an open watercourse. The use of erosion control protection measures (such as erosion control blankets or addition of bonded fibre matrix on bare soils within the newly constructed channels will be required to prevent sediment loading of stormwater passing through the drain. Interceptor measures may also be required, such as fibre rolls, to slow the flow under short term conditions, which allow for sediment accumulation and removal as needed, in strategic locations. During site construction and site grading work, suitable sedimentation controls will be required to help control and reduce the turbidity of run-off water which may flow towards the surface water features. As construction work progresses at the site, regular maintenance and additional sedimentation measures will be required to limit the effect of siltation of run- off water in localized areas. If deficiencies are identified in the performance of the sediment and erosion control measures through regular inspection, enhancements beyond the recommended design may be required."	Urban Construction Sites, to the satisfaction of the City of London.
Page 27 of LDS also has a number of recommendations supported by ECAC. Additional Considerations "Development at the site and the construction of a realigned drain corridor for the Axford Drain is expected to alter the current groundwater and surface water interactions. As part of grading works, subdrains and drainage tiles which have been installed across the site to improve drainage and redirect water from the golf features, will be removed. It is important to ensure that proposed development at the site has consideration for providing clean stormwater run-off towards	Acknowledged. The Sunningdale North Stormwater Management and Axford Drain Restoration (ERI, March 2023) Report recommends Level 1 'Enhanced' water quality control through a combination of upstream oil and grit separator (OGS) pre-treatment, maintenance forebays, and shallow wetland treatment cells that will primarily function as a combined erosion control facility to mitigate the erosive flows to the Axford Drain. This proposed treatment train will ensure clean stormwater run-off is discharged to the Axford Drain.

ECAC Comment	Response
the Axford Drain, and the naturalized features which will be located within the constructed corridor. There is a risk that surface water run-off from the site could be responsible for increased salt loading during late winter and early spring periods. As such, consideration should be given to identifying appropriate mitigation measures to reduce potential salt loading associated with the development and control / maintenance during the winter months under post-development conditions."	
ECAC agrees that the salt and salt management ideas on page 36 of LDS are sound, it is unclear how salt and other contaminates can be avoided or mitigated post construction.	Acknowledged. Management of salt-impacts is a challenge faced by all developments, since there must be a balance between the safe application of salts in winter conditions, and not over-salting the environment.

RECOMMENDATION #5

ECAC Comment	Response
ECAC supports the following from LDS and strongly recommends them as conditions of draft plan approval. As noted on page 27 of LDS, "It is important to ensure that proposed development at the site has consideration for providing clean stormwater run-off towards the Axford Drain, and the naturalized features which will be located within the constructed corridor." Once the final proposed layout and design information is provided, detail design and the detailed stormwater management design during construction must address this to the satisfaction of the City and the UTRCA. Ideally, a flow can be	Acknowledged. Detailed design drawings will need to demonstrate that clean stormwater is being directed to the Axford Drain, consistent with the submitted stormwater management reports.

ECAC Comment	Response
maintained throughout dry weather periods. (See water balance in LDS starting on page 28).	
LDS notes on page 29: "It is also noted that the analysis presented in the following sections is based on the proposed layout and design information which has been provided by the developer and their civil design team. As detailed design occurs, updates to this analysis may be required to reflect specific changes to the proposed site grading, LID features and other design aspects of the site."	"As detailed design occurs, updates to this analysis *may* (emphasis added) be required to reflect specific changes to the proposed site grading, LID features…" in the event LID features have been recommended. However, it is important to note that silt and silt till soils and areas with perched shallow groundwater are not conducive to the effective functioning of infiltration-based LID structures; and, the EIS has not identified the need to replicate the existing water balance contributions as part of the design criteria.
However, ECAC notes page 32 of LDS indicates soil conditions are unlikely to be conducive to effective LID measures.	Acknowledged and confirmed - Soil and/or shallow groundwater conditions throughout much of the site are not conducive to LID measures.

RECOMMENDATION #6

ECAC Comment	Response
ECAC supports LDS page 31. This should be more than a consideration – it must be a requirement of development approval: "As the detailed design of the Axford Drain corridor is prepared, consideration should be given to re-assessing the infiltration and run-off components which contribute base flows to the newly constructed feature are adequate to sustain the natural features which are created within the corridor. The detailed stormwater management design will also factor into this analysis, with portions of the site being directed through future SWM facilities which will outlet to the drain."	Acknowledged. However, as referenced on LDS page 32, "the design objectives of the Axford Drain reconfiguration does not require sustained post-development groundwater infiltration volumes". As such, it may not be possible to sustain flows within the Axford Drain through dry weather periods. This is consistent with the predevelopment condition that exists.

RECOMMENDATION #7

ECAC Comment	Response
ECAC supports LDS page 34 "To help reduce dewatering requirements, consideration should be given to optimizing design depths for site servicing and building excavations. Where possible, construction during the drier summer months is preferred to carry out excavations when stabilized groundwater levels are not elevated under seasonal conditions. If construction occurs during wet-weather conditions or when seasonal water levels are elevated, monitoring the water levels within the monitoring wells during construction can be helpful to determine the zone of influence, and to identify changes in the water level while construction dewatering is actively occurring."	These are standard recommendations within all Hydrogeological Reports. Having said that, based on our experience with Sunningdale West and Sunningdale Court (to the south of Sunningdale Road) it is not anticipated that significant construction dewatering will be required.

RECOMMENDATION #8

ECAC Comment	Response
ECAC agrees with and supports including list of avoidance measures starting on page 72 of the EIS in the construction documents. They should also be included in the conditions of draft plan approval and/or of development.	It is unclear exactly what is being referred to here by ECAC. Nonetheless, conditions of draft approval will require the proponent to implement all recommendations to the approved EIS.

RECOMMENDATION #9

ECAC Comment	Response
The construction documents also include having on site monitoring and inspection by either City and/or UTRCA staff. We add this because page 84 discusses monitoring only at detailed	Page 84 indicates that "Ecosystem Recovery Inc. shall develop a pre-development, development and post development monitoring plan at the Detailed Design stage of the project". To

ECAC Comment	Response
design stage.	be clear, this is when the detailed monitoring plan will be developed. Onsite monitoring will be required, daily, as the Axford Drain reconstruction / realignment proceeds. Pursuant to standard subdivision agreement clauses, the City of London is permitted on site, as they may desire. In addition, as previously stated herein, the proponents independent professional consulting engineers will be on site daily to administer the construction contract and verify that all proposed mitigation measures have been constructed and to ensure environmental management systems are installed and performing as designed.

SPECIES AT RISK AND SIGNIFICANT WILDFLIFE HABITAT

ECAC Comment	Response
BUTTERNUT Page 24 EIS One butternut (Juglans cinerea) and a potential sapling was found within the 120 m study area, which is a species at risk and classified as Endangered. No butternut health assessment or genetic testing was undertaken on this tree as it is not anticipated to be affected by the proposed works.	Acknowledged. The location of the butternut is outside of the proposed development limit and construction will have no impact on the species.

RECOMMENDATION #10

ECAC Comment	Response
Given the sensitivity of the species, and its location near the golf cart parking lot it would be helpful if the proponent would agree to a site specific management plan for these two trees. If the	A site-specific management plan is not necessary, as these butternut trees will not be impacted by the proposed

ECAC Comment	Response
mature tree is healthy Cat 3 as per the Ministry MECP species at risk web site, the tree could be useful in determining how to prevent or resist Butternut Canker.	development.
Also, as noted on page 71 of the EIS and recommendation 5 on page 86, a tree preservation plan will be developed as a condition of the draft plan approval. This plan could incorporate recommended measures for the protection of the butternut tree and sapling.	Acknowledged. The conditions of draft approval will require the proponent to implement all recommendations of the approved EIS. This will include the requirement to complete a tree preservation plan. Notwithstanding this, the butternut tree and sapling will not require any protective measures as they will be well removed from the limits of proposed development and will not be impacted.

PONDS

RECOMMENDATION #11

ECAC Comment	Response
ECAC notes that the amount of land to replace the lost wetland features is smaller than current. This should be reviewed in light of the no net loss of ecological features requirement.	The revised EIS compensation for wetland is a 1:1 ratio and will be of higher ecological value than existing wetland features.

TURTLES

ECAC Comment	Response
The EIS notes on page 45 "Turtle Wintering Area – Turtle wintering habitat is present within the study at multiple locations including Pond A, B and C and the Irrigation Pond. No turtles were observed within at these locations, but historical records, and golf course staff communication identify snapping turtle have been historically present within the golf course lands south of Sunningdale Rd. Snapping turtle are able to travel long distances over land in	Acknowledged.

ECAC Comment	Response
search of food, mates, and wintering habitat."	
It is unclear what steps were taken to protect turtles during construction of the subdivision south of Sunningdale.	The subdivision south of Sunningdale Road is not the subject of the EIS under review. Notwithstanding this, no turtle habitat was located within the limits of the development south of Sunningdale Road, and preconstruction inspections confirmed that no turtles were on site.
Page 34 of the EIS notes "Overwintering habitat for turtles is present within Ponds A, B, C and the Irrigation pond due to the soft substrate, deep water levels and open water features."	Acknowledged. Compensation wetlands within the corridor are being designed to include turtle overwintering habitat.
ECAC believes there is a possibility that one or more of these ponds are home to a wider variety of biologic species as was the case for the anthropologic pond at 905 Sarnia Road. As noted on page 25 of the EIS, the largest pond referred to as the irrigation pond (also called Bass Pond in the EIS) is a man-made feature, which gets its water from Medway Creek has been stocked with bass. Water from this pond is pumped for irrigation and therefore is affected by fluctuating water levels. Page 25 of the EIS appears to suggest only visual observation was conducted by the consultants.	We appreciate ECAC thoughts / beliefs on this possibility. Notwithstanding this, as a result of the years of onsite study and analysis required by the scoped EIS, we are quite confident in our knowledge and description of the biological species which reside within the irrigation pond. In addition, Section 3.13.4 of the EIS confirmed that a fish community assessment was conducted on Axford Drain, the Irrigation Pond, Ponds A, B, C, Forgotten Creek, and Tributary A. The assessments were conducted utilizing a backpack electrofishing unit and minnow traps.

RECOMMENDATION #12

ECAC Comment	Response
Sampling of the ponds that have not been recently dredged (some have not been dredged in over 10 years according to the reports), be conducted to determine if they provide habitat, especially for terrestrial crayfish and turtles. If it is determined that these and other sensitive biota are present, a plan for relocation must be prepared and implemented before the features are removed.	As part of the EIS, amphibian call surveys, reptile basking surveys, aquatic habitat assessments and fish community survey / assessment was completed along the entire length of all streams, the irrigation Pond, Ponds A, B, C, Forgotten Creek, and Tributary A. As such, a solid understanding of the existing habitat and the species that they support is in hand. A wildlife management plan has been developed which includes both a fish a wildlife salvage requirement and associated agency permit

ECAC Comment	Response
	acquisitions prior to construction to protect the existing wildlife on the site.

RECOMMENDATION #13

ECAC Comment	Response
ECAC recommends that Scott Gillingwater at the UTRCA be consulted at detailed design regarding the establishment of turtle overwintering habitat in the corridor (See page 87, recommendation 10 of the EIS) and that he be consulted in the preparation of the Environmental Management Plan as it relates to turtle habitat.	Turtle overwintering habitat has been included within the Axford Drain Corridor design update.
It is unclear to ECAC as to the timing of works and impact on habitat. If in winter, it could harm overwintering turtles. If in the spring, work would impact amphibian breeding habitat potentially eliminating it.	The developed wildlife management plan outlines all the requirements for timing of construction works to avoid impacts to wildlife and the requirements of a wildlife and fish salvage for the site.
ECAC notes that Golf course turf maintenance staff have identified snapping turtles using sand bunkers for laying eggs historically year after year in areas just outside of the study area. ECAC wonders what the golf course has been doing to avoid harm to this species at risk? Hopefully it has been notifying the turtle team at the UTRCA to come and get the eggs before they are damaged. If this has not been standard procedure we have this separate recommendation for the proponent:	Section 3.10.1 of the EIS indicates that golf course turf maintenance staff have identified snapping Turtle using sand bunkers for laying eggs historically year after year in areas just outside of the study area. To clarify, this was a single snapping turtle and the sand bunker was located south of Sunningdale Road. The snapping turtle was witnessed year after year, confirming that the golf course did not cause any harm to this species at risk.

RECOMMENDATION #14:

ECAC Comment	Response
When staff see a turtle laying eggs in a sand trap, immediately call the UTRCA and ask the turtle team to come out and collect	Acknowledged. The golf course will be advised to contact the UTRCA turtle team, to understand the appropriate protocol,

ECAC Comment	Response
the eggs.	when turtles are found nesting in sand traps.

AMPHIBIAN BREEDING HABITAT – CONFIRMED SIGNIFICANT WILDLIFE HABITAT

ECAC Comment	Response
It is also noted that the amphibian surveys found significant activity that is to be eliminated by the development (page 32 EIS).	Page 32 of the EIS and Table 3-7 (Amphibian Call Results) confirmed the presence of amphibians within the study area.
Page 68 of the EIS sounds hopeful about replacing amphibian breeding habitat and turtle overwintering habitat. "While the removal of the wetlands are required as part of the development design, the creation of wetlands as part of the Axford Drain Corridor design will compensate for the removed wetlands. These will be designed to include turtle overwintering habitat, amphibian movement and different sizes, shapes, and depths to allow for wildlife use."	There is nothing "hopeful" about the statements made on page 58 of the EIS.

RECOMMENDATION #15

ECAC Comment	Response
Because recreational use is indicated (Drawing 2 LDS and Axford Drain Corridor Plan in the EIS show a 3.2 m wide paved path) it is recommended that signage be installed along the feature to explain the Medway environment as well as the objectives of the Drain Corridor Plan. An example of information that can be included can be found on the sign at the trail head below the Sunningdale parking lot and on signage along the multiuse pathway starting at the parking lot and going south.	The recommendation for signage is noted and will be taken into consideration.

ECAC Comment	Response
The signage can explain what the EMP and Corridor Plan are trying to achieve, the number for the UTRCA and / or the City to report sightings, the use of eBird and INaturalist and the like.	
Page 56 of the EIS points out the constraints. All of these losses are proposed to be compensated by the work done to remediate the watercourse. It is subjective to conclude that there is a direct compensation for loss of amphibian breeding habitat for example, by improving the watercourse. Even page 65 of the EIS points to this being a potential loss." Potential to impact amphibian breeding habitat;"	The EIS acknowledges that based on the above evaluations of the aquatic and terrestrial environments, the Sunningdale North development will result in the loss of habitat of low ecological value given its disturbed and anthropogenically influenced setting and will not result in a net negative impact. The loss of habitat and vegetation communities can be mitigated through the planting of native trees, shrubs, and herbaceous species along the Axford Drain corridor to maintain the overall habitat coverage and ecological function for any resident wildlife. With the implementation of the proposed mitigation and the realignment/naturalization of the Axford Drain corridor, a net environmental benefit is anticipated to result from the proposed works. It is subjective to suggest that this is not achievable. Woodland area will experience a net increase and wetland area will be compensated at a 1:1 ratio.
It is difficult to understand how you remove ponds identified as breeding habit and expect to replace them with smaller areas within the remediated corridor in an area that will become a neighbourhood with more people, 12 months of road use and maintenance including sand and possibly salt, more pets and more lighting than the current golf course use.	The new complete corridor will offer extensive natural heritage features, including breeding habitat, which will provide a net environmental benefit over the features that will be replaced, which are fragmented, have low ecological value, and are routinely disturbed and anthropogenically influenced as a result of past and ongoing golf course maintenance practices (daily cutting, herbicide and pesticide use, piped watercourses, etc.).

RECOMMENDATION #16

ECAC Comment	Response
ECAC agrees that lots abutting the naturalized watercourse should (actually, must) be fenced with no gates. This is	Acknowledged. The EIS recommends that all lots, adjacent to Open Space / Green Space blocks are fenced without gates,

ECAC Comment	Response
consistent with EIS recommendation #17 page 89.	consistent with London Plan policy 1415.

SIGNIFICANT WOODLANDS

RECOMMENDATION #17

ECAC Comment	Response
It is noted that the amount of compensation for loss of significant woodland is less than the amount lost. This should be revised otherwise, there is net loss of ecological features.	Policy 1401 of the London Plan indicates that mitigation shall mean the replacement of the natural heritage feature removed or disturbed on a one-for-one land area basis. As such, the revised EIS is removing a total of 3.49 ha and replacing it with 3.88 ha of compensation area which consists of wetland, woodland, meadow, and aquatic habitat. As such, the policy requirement has been fulfilled. In addition, the revised EIS will reduce the area of the meadow compensation cells, proposed with the realigned / reconstructed Axford Drain, in favour of increased areas of wetland and woodland compensation cells. As such, the revised EIS will provide 0.863 ha of woodland compensation cell to offset the 0.353 ha of woodlands removed.

RECOMMENDATION #18

ECAC Comment	Response
As noted on page 50 of the EIS, the woodlands identified as meeting the city criteria for significance be designated Green Space and zoned as such on Map 1 and changed on Map 5 from Unevaluated to Significant Woodland. This must be done as part of the subdivision process and related changes to the OP and zoning by law. (Also note this is Recommendation 1 of the EIS on page 86).	Acknowledged. The EIS recommends this in recommendation 1.

BUFFERS

ECAC Comment	Response
Page 56 of the EIS refers to Figure 4-1 and the features on the site. Page 56 of the EIS also notes that “Associated buffer and setbacks for these valuable natural resources are required” however, none are shown on Figure 4-1.	All required / proposed buffers are depicted on Figure 4-1. They are also depicted in Figure 6-2.
Nor are they indicated in section 7.3.4 on page 69.	Section 7.3.4 is related to Significant Woodlands. The woodlands designated as significant are identified on Figure 4-1 (which is referenced in Section 7.3.4) complete with the required / proposed buffers.
The drawing for the Axford Drain corridor clearly shows hard surfaces and a SWM facility within the 30 m corridor. (With minimal ecological buffers). In fact, the cross sections shown in the EIS (Figure 6-3) indicate that the proposed 10 m multi use pathway block is also labelled as a “10 m Nature Heritage Feature buffer.” This is simply not acceptable.	This is consistent with past discussions with the City of London and the UTRCA and is consistent with Buffer guidelines set based on the specifications in the City of London Guidelines for Determining Setbacks and Ecological Buffers (2004) and Environmental Management Guidelines from the City of London (2021).
The buffer widths are not consistent with the current Environmental Management Guidelines. It is unclear to ECAC why page 70 of the EIS refers to the prior version of the EMG.	When the EIS was originally scoped and the vast majority of the field work completed, the previous version of the City of London’s EMG was in force and effect. It was rightly pointed out, through the City’s EIS review comments, that the EIS would need to be consistent with the most current EMG. As such, the revised EIS has been updated appropriately.

RECOMMENDATION #19

ECAC Comment	Response
The current Environmental Management Guidelines must be used to determine buffer width for the Axford Drain Corridor Plan and for the Significant Woodlands.	Acknowledged. The revised EIS has been updated appropriately.

MONITORING

ECAC Comment	Response
As per p. 41 LDS "Coordination with the ecological consultant will be required to document the conditions within the wetland features, and the general health of the flora and fauna within the natural features. The frequency of these inspections will be guided by the ecological consultant, to ensure that seasonal variations are suitably documented through the spring, summer and fall periods. Inspection reports should be generated, for circulation to the City (and other approval authorities, as appropriate) on a regular (seasonal) basis. Monitoring of native species plantings in buffer areas is also recommended. More specifically, this will include inspection of tree and shrub stock and herbaceous vegetation plantings to evaluate survival and success of establishment and identify need for replacement plantings for any dead material. It is anticipated that the City of London will want the opportunity to comment on the monitoring plan prior to construction."	Acknowledged. Section 11 of the revised EIS provided extensive information on the required pre-construction, construction, and post-construction monitoring requirements. These requirements are captured within EIS recommendation 11, which will be carried forward as a condition of draft approval.
ECAC notes that page 84 includes the following: "Ecosystem Recovery Inc. shall develop a pre-development, development and post development monitoring plan at the Detailed Design stage of the project. The intent is to monitor the biophysical parameters and environmental management systems throughout the project. This environmental monitoring plan will be prepared in consultation with the UTRCA and City of London staff."	Acknowledged. Please refer to the response provided immediately above.

RECOMMENDATION #20

ECAC Comment	Response
The city should do more than just comment. The city needs to approve the monitoring plan as a condition of draft approval and / or development. The approval must require concurrence by a City Ecologist and the UTRCA.	Acknowledged.
ECAC notes recommendation 12, page 88 of the EIS suggests a 5 year monitoring plan.	Acknowledged, the revised EIS recommends a five (5) year monitoring plan in recommendation 11.

RECOMMENDATION #21

ECAC Comment	Response
The Environmental Management Plan also include remediation requirements. For example, amphibian surveys be required and if amphibian surveys note a reduced population of amphibians, there should be a requirement for compensation. Although the loss of SWH features is supposed to be compensated by the watercourse improvement, only time will tell if the ecological FUNCTIONS have been compensated for. Experience from the 905 Sarnia wetland compensation site cited by Stantec, points to ongoing monitoring in 2 to 3 year intervals beyond the initial period (see the last page in the following 2021 presentation to EEPAC by Stantec).	Compensation habitat is designed to provide suitable wildlife habitat. If monitoring shows that compensation habitat is not functioning as intended, discussions with agencies will occur.

OTHER – RECOMMENDATION 8 of the EIS

ECAC Comment	Response
"The detailed design process will also consider the inclusion of raptor perch poles, osprey platforms and barn swallow nesting cups underneath the multi-use trail bridge, if appropriate, for this size of the restored green space corridor."	Acknowledged. However, upon further review, it has been determined that the size of the green space corridor is not appropriate for raptor perch poles and osprey platforms. As such, these will not be included in the final design for the realigned / reconstructed Axford Drain. Barn swallow nesting

ECAC Comment	Response
	cups will be included in the detailed design of the multi-use trail bridge.
ECAC has done some preliminary consultation with a PhD candidate at the Advanced Facility for Avian Research at Western who has the following comments: "Most barn swallow mitigation that follows the Ontario provincial guidelines (e.g., wooden huts along highways) will never be used. I (AFAR) can provide design specs based on recommended practice and historical successes from Birds Canada, like the one we built in the Medway. The nest cups under the bridge may or may not be appropriate depending on the design of the site and the density of traffic. Is a standalone structure possible? Birds won't use a new structure right away. Building it as early as possible (i.e., before the breeding season one year prior to site modification/construction) is recommended so that post-fledgling birds wandering the site before migrating may find it and return the following year to use it.	No barn swallows are being harmed as a result of the proposed development. As such, the addition of barn swallow cups underneath the multi-use trail bridge are not being provided as a result of a mitigation requirement, but rather as an enhancement measure. It is acknowledged that the success of the nest cups enhancement is largely dependent upon the design of the site and density of traffic. With this in mind, barn swallow presently nest under the golf course bridges over Medway Creek. As such, while it may take a few years for birds to use these nest cups, once post-fledgling birds find and use the nest cups, then this will be a significant additional enhancement to the Axford Drain corridor.
I'm skeptical of the raptor perches being used. If birds are accustomed to using trees, are they going to switch to built infrastructure? These designs should be based on evidence. Osprey platforms generally seem good for this area, but their placement needs to be thought through carefully."	As previously discussed herein, upon further review, it has been determined that the size of the green space corridor is not appropriate for raptor perch poles and osprey platforms. As such, these will not be included in the final design for the realigned / reconstructed Axford Drain.

OTHER – PRIVATE SWM

ECAC Comment	Response
Stormwater facility 10 which is proposed to be operated by the Golf course (page 63 of the EIS). Given the history of privately built and operated storm facilities,	For years, all storm facilities were privately built and privately maintained, until assumed by the City of London. Developers use the same servicing contractors that the City of London uses to construct storm facilities. It is anticipated that the City will

ECAC Comment	Response
ECAC questions if this is the right decision although it does appreciate that the proposal does reduce water taking from the Medway Creek.	require the golf club to enter into a maintenance and management agreement, in association with SWM facility No. 10, not dissimilar to the agreement that was previously in place for the stormwater management facility south of Sunningdale Road and what is in place in Riverbend.

We trust that the above responses have clarified ECAC's comments and concerns. Should further clarification be required, please do not hesitate to contact the undersigned.

Sincerely,

Corlon Properties Inc., Matrix Solutions Inc., and LDS Consultants Inc.

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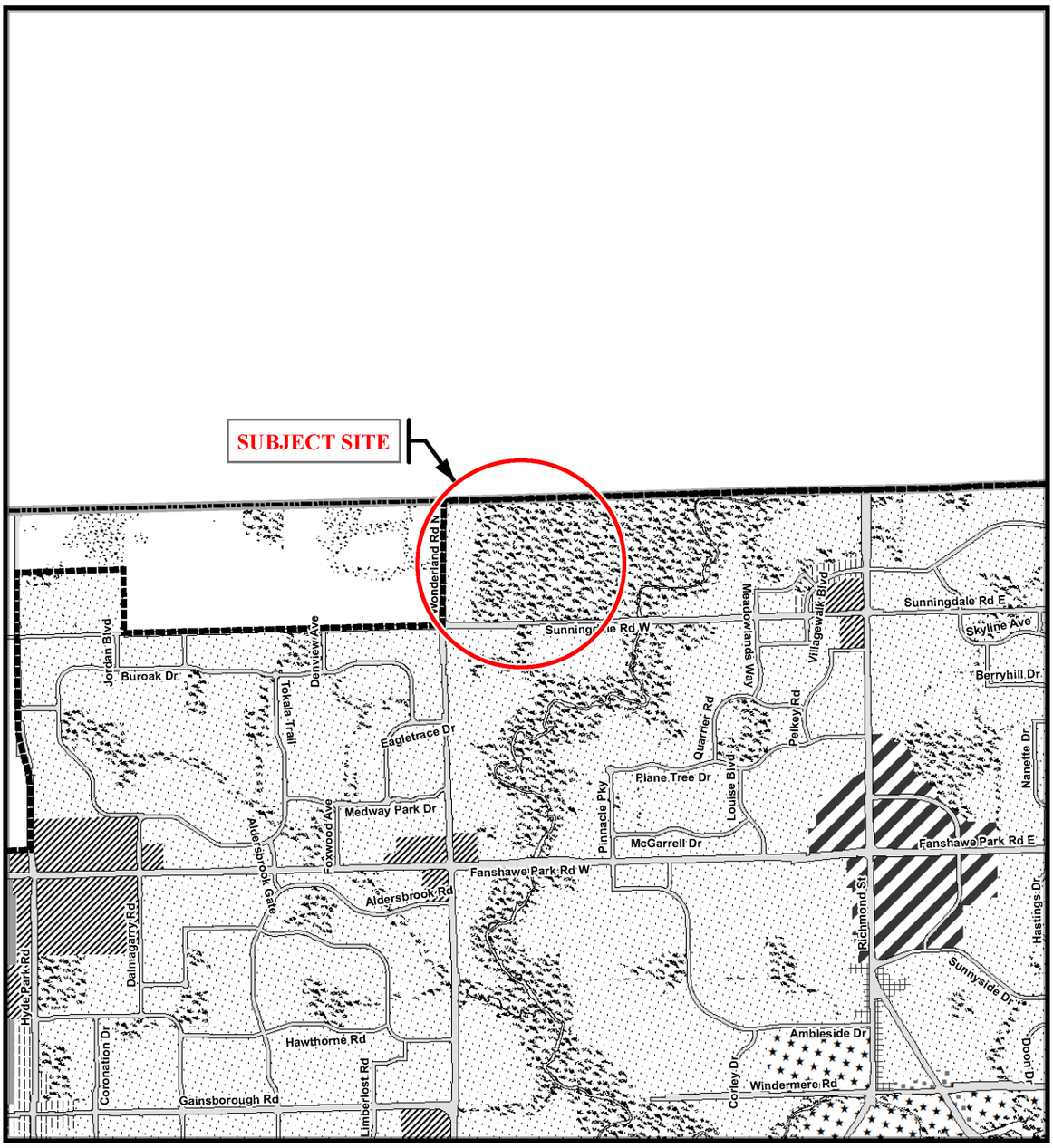
Appendix F – Relevant Background

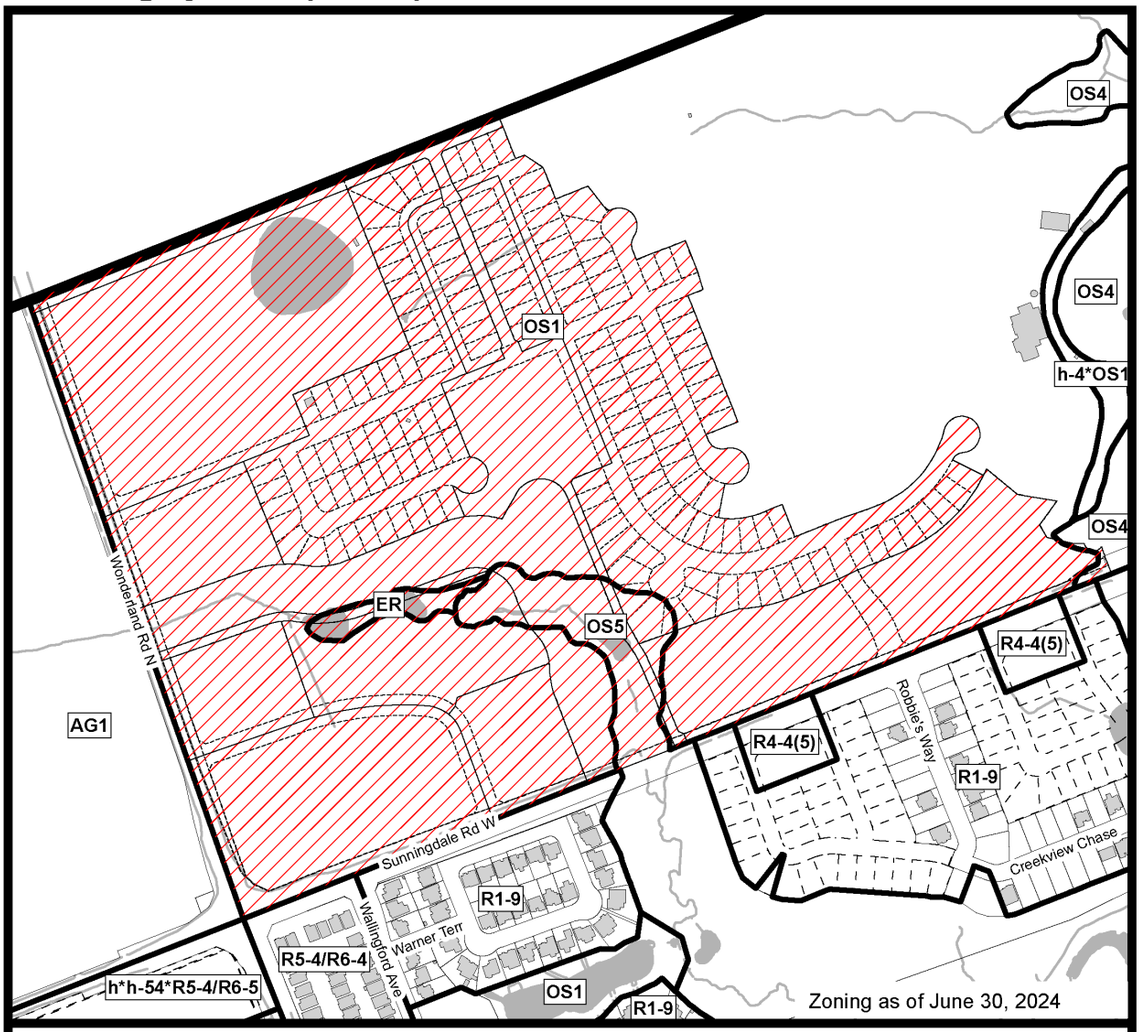
Map 1 – Place Types



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

CITY OF LONDON **Official Plan** **LONDON PLAN MAP 1** **- PLACE TYPES -** PREPARED BY: Planning & Development	Scale 1:30,000 0 150 300 600 900 1,200 1,500 Meters	**File Number:** OZ-9623 **Planner:** LM **Technician** RC **Date:** 2024/7/22

Z-.1 Zoning By-law Map Excerpt



COUNCIL APPROVED ZONING FOR THE SUBJECT SITE: OS1, OS5 & ER

1) *LEGEND FOR ZONING BY-LAW Z-1*

R1 - SINGLE DETACHED DWELLINGS
R2 - SINGLE AND TWO UNIT DWELLINGS
R3 - SINGLE TO FOUR UNIT DWELLINGS
R4 - STREET TOWNHOUSE
R5 - CLUSTER TOWNHOUSE
R6 - CLUSTER HOUSING ALL FORMS
R7 - SENIOR'S HOUSING
R8 - MEDIUM DENSITY/LOW RISE APTS.
R9 - MEDIUM TO HIGH DENSITY APTS.
R10 - HIGH DENSITY APARTMENTS
R11 - LODGING HOUSE

DA - DOWNTOWN AREA
RSA - REGIONAL SHOPPING AREA
CSA - COMMUNITY SHOPPING AREA
NSA - NEIGHBOURHOOD SHOPPING AREA
BDC - BUSINESS DISTRICT COMMERCIAL
AC - ARTERIAL COMMERCIAL
HS - HIGHWAY SERVICE COMMERCIAL
RSC - RESTRICTED SERVICE COMMERCIAL
CC - CONVENIENCE COMMERCIAL
SS - AUTOMOBILE SERVICE STATION
ASA - ASSOCIATED SHOPPING AREA COMMERCIAL

OR - OFFICE/RESIDENTIAL
OC - OFFICE CONVERSION
RO - RESTRICTED OFFICE
OF - OFFICE

RF - REGIONAL FACILITY
CF - COMMUNITY FACILITY
NF - NEIGHBOURHOOD FACILITY
HER - HERITAGE
DC - DAY CARE

OS - OPEN SPACE
CR - COMMERCIAL RECREATION
ER - ENVIRONMENTAL REVIEW

OB - OFFICE BUSINESS PARK
LI - LIGHT INDUSTRIAL
GI - GENERAL INDUSTRIAL
HI - HEAVY INDUSTRIAL
EX - RESOURCE EXTRACTIVE
UR - URBAN RESERVE

AG - AGRICULTURAL
AGC - AGRICULTURAL COMMERCIAL
RRC - RURAL SETTLEMENT COMMERCIAL
TGS - TEMPORARY GARDEN SUITE
RT - RAIL TRANSPORTATION

"h" - HOLDING SYMBOL
"D" - DENSITY SYMBOL
"H" - HEIGHT SYMBOL
"B" - BONUS SYMBOL
"T" - TEMPORARY USE SYMBOL

CITY OF LONDON

PLANNING SERVICES / DEVELOPMENT SERVICES

ZONING
BY-LAW NO. Z.-1
SCHEDULE A

THIS MAP IS AN UNOFFICIAL EXTRACT FROM THE ZONING BY-LAW WITH ADDED NOTATIONS

FILE NO: OZ-9623 LM

MAP PREPARED: 2024/07/22 RC

1:6,500
0 30 60 120 180 240 Meters