



May 23, 2019

Municipality of Middlesex Centre
10227 Ilderton Road
Ilderton, Ontario
N0M 2A0

Attention: Kelly Henderson
Planner

Response to Agency Comments on the Proposed Changes to Draft Plan of
Subdivision 39T-MC0902 for the Edgewater Estates Development

Dear Ms. Henderson:

As you are aware, South Winds Development Co. Inc. (South Winds) proposed changes to Draft Plan of Subdivision (39T-MC0902) in the form of a red-line amendment.

The purpose of this letter is to address comments provided by the Ministry of Natural Resources and Forestry (MNRF), Ontario Parks and the Ministry of the Environment, Conservation and Parks (MECP).

Below, we've provide the aforementioned agency comments followed by our response.

Comment 1 - MNRF Parks: Komoka Provincial Park is situated to the west and south of this development. In order to buffer the provincial park lands from the development footprint, and to maintain a somewhat natural corridor to/from the Thames River valley, Ontario Parks supported the design concept of establishing Street B as walkway connecting the development to Glendon Drive. The proposal to create Street Four and develop residential lots 182-199 along the property line would impact the extent of this buffered corridor by removing any functional setback, and could contribute to increased impacts to the provincial park via unauthorized access, residential encroachment and dumping. Appropriate property limit fencing (e.g. six foot height with no gates or other openings) along the entire westerly boundary of the development area will be important to mitigate these risks. Having the residential lots directly about the park boundary in this area will also more negatively affect the movement of wildlife between the park woodland property that fronts Glendon Dr. and the larger park habitat areas to the south. As a result some additional and/or visual barrier fencing will need to be considered to reduce the impact of residential noise and activities on adjacent wildlife patterns.

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Response 1. Consistent with best management practices, South Winds is willing to implement chain link fencing with no gates along the western boundary of the development area as a mechanism to mitigate unauthorized access, residential encroachment and/or dumping on Komoka Provincial Park (Park) lands.

South Winds is interested in maintaining wildlife patterns between the Park lands to the west and the Park lands to the south (i.e. Blk 147) of the development. For this reason, as part of the development South Winds is willing to enhance (e.g. plantings, unobstructed passage, etc.) and maintain the existing wildlife corridor between the Park land to the west and Blk 147.

West of the development includes Park and agricultural lands with direct access to the larger Park habitat areas to the southwest of the development. As a result, the development is not anticipated to have a negative impact on wildlife patterns to and from the Park woodland that fronts Glendon Drive and the larger Park habitat areas to the south along the Thames River corridor.

Comment 2 - MNRF Parks: The wooded area immediately south of the development and north of the Thames River (identified as Blocks 145 and 147 on the draft plan) is identified as Public Park/Open Space on the draft plan. This designation is appropriate in that the majority of wooded area is designated as part of the Komoka Park Reserve Provincially Significant Life Science Area of Natural and Scientific Interest. Block 145 is also immediately adjacent to Komoka Provincial Park and provides a natural buffer to the Thames River. These areas are known to support species at risk and other significant species. Uncontrolled access to these areas has the potential to negatively impact these species and their habitats and will likely create management issues for Komoka Provincial Park resulting from unauthorized access to park and river.

Response 2. Condition 34.b of the February 15, 2016 Redlined Revision of Draft Plan of Subdivision states that "fencing will be required to limit access to the natural heritage features and to lands owned by the Province of Ontario to the satisfaction of the Municipality". South Winds remains committed to working with the Municipality to satisfy this condition which will provide mitigation against uncontrolled access to the Park lands and the Area of Natural and Scientific Interest (ANSI).

Comment 3 - MNRF: It is MNRF's expectation that phase 2 of the Edgewater Estates development would include habitat compensation for species at risk habitat that was removed during previous site alteration work which was not registered under the Endangered Species Act, 2007. This was indicated to the proponent in the Letter of Advice (AYL-L-076-18) sent on June 15h, 2018, specifically, "It is MNRF's expectation that additional discussion will take place between the Ministry and the



proponent regarding future phases of the Edgewater Estates development and habitat compensation for SAR habitat (e.g. creation of a natural grassland area) to account for habitat removed during previous site alteration work that was not registered under the ESA". The draft plan of subdivision does not currently indicate any areas where habitat compensation will take place.

Response 3. Although the draft plan of subdivision does not currently indicate areas where habitat compensation will take place, South Winds intends to utilize the buffer setbacks from the development and the natural features associated with Phase 1 (13,913 m² or 1.39 ha) and Phase 2 (8,439 m² or 0.84 ha) to create SAR habitat for a total of 2.23 ha of contiguous habitat. The intent is to revegetate these areas using native grass species to create edge grassland habitat for SAR snakes. In addition, South Winds is committed to implementing snake basking and thermoregulation features (e.g. rock and log piles) within the buffer areas to enhance the edge grassland habitat.

In addition to the above, the planting plan for the stormwater management (SWM) pond includes an area of 13,850 m² (or 1.39 ha) of contiguous/linear grassland based on a native seed mix. Similar to Phase 1 and Phase 2 buffers, South Winds is committed to implementing snake and turtle basking and thermoregulation features (e.g. rock and log piles) in association with the SWM pond. Holistically, the proposed habitat creation/enhancements promote wildlife usage/connectivity between the development and the existing natural features to the south and west of the development.

Comment 4 - MECP: I understand that the applicant has recently proposed changes to the plan in the form of a red-lined amendment. The MECP London District office was recently contacted by MMAH and requested to review the proposed changes to the plan and provide comment. We have completed a review of the information provided to us by MMAH. The only issue MECP would like to bring to the attention of the Municipality and the Developer pertains to stormwater management and the potential need to apply for and receive an amended Environmental Compliance Approval (ECA) for stormwater management from MECP. The attachment to this e-mail contains the current ECA issued by this ministry. The documentation provided to us speaks to a boundary adjustment to a revised stormwater management design. This being the case, it is conceivable that an amended ECA may need to be applied for and issued with respect to Stormwater Management. Please ensure that the Developer is aware of the requirements.

Response 4. Following the completion of detail design for Phase 2, South Winds together with their engineer will review the ECA to confirm whether Phase 2 meets the current approval.



However, as noted in the response letter from MacNaughton Hermesen Britton Clarkson Planning Limited (MHBC), there are no revisions proposed to the layout of the stormwater management block as part of these current redline revisions. The layout of the SWM ponds is in accordance with the engineering plans submitted and approved under the ECA.

We hope that this letter helps to address the comments received by MNRF, Ontario Parks and MECP on the proposed changes to draft plan of subdivision 39T-MC0902.

Sincerely,

DILLON CONSULTING LIMITED

Daniel Bourassa
Project Manager

DJB:tlm

cc: Stacey Graham, Bob Stanley – South Winds; Carol Wiebe – MHBC; Rick Dykstra –
Dillon Consulting Limited
Our file: 18-7920