

Woods Edge Subdivision

Mount Brydges, Ontario, N0L1W0

September 15, 2025

Municipality of Strathroy-Caradoc

Attn: Mayor Colin Grantham, Deputy Mayor Mike Maguire,  
Councillors B. Derbyshire, Greg Willsie, Sandi Hipple,  
Frank Kennes, John Brennan, Donna Palmer, Steve Pelkman,  
and Clerk Jennifer Pereira

52 Frank Street

Strathroy, Ontario, N7G2R4

Upper Thames River Conservation Authority

Attn: Tracy Annett, General Manager

1424 Clarke Road

London, Ontario, N5V 5B9

Subject: Action and Compliance Required – Woods Edge Stormwater Management Ponds

Dear Mayor Grantham, Deputy Mayor Maguire, Councillors Derbyshire, Willsie, Hipple, Kennes, Brennan, Palmer, Pelkman, Clerk Pereira, and Upper Thames River Conservation Authority General Manager Tracy Annett,

We, the residents of the Woods Edge neighbourhood in Mount Brydges, are writing collectively to express urgent concerns regarding the two stormwater management ponds in our subdivision. We respectfully request that this matter be formally placed on the next available Council agenda for discussion and direction, given its significance for regulatory compliance, public health, property values, and municipal accountability.

These facilities were approved by Council and assumed by the Municipality both as critical stormwater infrastructure and as integrated aesthetic community features, forming part of the subdivision's design and approval process [13]. Their current unmanaged state, characterized by shallow standing water, extensive cattail and potentially invasive vegetation overgrowth, possible sediment accumulation, and a lack of inspection or oversight, undermines both of these intended purposes.

This neglect places the Municipality in direct conflict with its own Master Plan [1], provincial standards [2], and the Environmental Compliance Approval [12] under which the ponds were constructed and are legally required to be maintained.

This matter cannot be dismissed as one of aesthetics alone. It is fundamentally about regulatory compliance, public health and safety, the protection of property values, and the Municipality's accountability for infrastructure it has formally approved and assumed.

## Concerns

### 1. Conflict with the Municipality's Own Master Plan

The 2024 Strathroy-Caradoc Water, Wastewater, and Stormwater Master Plan [1] clearly defines stormwater management ponds as municipal infrastructure requiring active operation and maintenance:

- The Municipality owns and manages multiple stormwater management ponds ([1], p. 67–68).
- Vegetation growth and the presence of invasive species reduce storage capacity and impair water quality ([1], p. 68).
- Proper operation requires removing invasive vegetation, dredging sediment, and ensuring ponds remain “thriving and free of invasive species” ([1], p. 68–69).
- The Plan acknowledges that no condition assessment program currently exists and recommends implementing an industry-standard inspection cycle ([1], p. 68–69).

The Municipality cannot reasonably maintain that the ponds were intended to be maintenance-free, given that its own Master Plan requires them to be actively managed [1]. Allowing invasive species and sediment to accumulate significantly is, by the Municipality's own policy, mismanagement.

### 2. Non-Compliance with Environmental Compliance Approval

The Environmental Compliance Approval ([12], ECA #4605-9D6N3K) for the Woods Edge subdivision explicitly specifies that the two stormwater ponds must provide a combined permanent pool of 1,530 m<sup>3</sup>, an extended detention volume of 8,115 m<sup>3</sup>, and a total storage volume of 10,146 m<sup>3</sup> at a total depth of approximately 3.8 metres ([12], p. 2).

Current resident observations suggest pond depths that are considerably shallower. Even if approximate, such a discrepancy suggests that the ponds may no longer provide the required storage and treatment volumes specified in the ECA. If confirmed, this would mean the ponds are not operating in accordance with their approved design.

Furthermore, the ECA requires that the Municipality, which is identified as the Owner, inspect the stormwater management ponds at least once per year, clean and maintain them to prevent excessive build-up of sediments and vegetation, and keep a logbook recording the results of inspections and maintenance ([12], p. 3-4). If no formal inspections or records exist, then the Municipality is in direct violation of these approval conditions.

Failure to maintain approved storage depths and to document inspection and maintenance activities is not a discretionary matter; it is a breach of a legal approval under the Environmental Protection Act. Such non-compliance exposes the Municipality to possible provincial enforcement, regulatory orders, and liability in the event of flooding, water quality failure, or public health risks.

### 3. Provincial Standards Require Active Maintenance

The Ontario Stormwater Management Planning and Design Manual [2] (endorsed by MECP) requires municipalities to:

- Conduct regular inspections and sediment removal to maintain function ([2], s. 6.3).
- Actively manage vegetation to prevent invasive species from spreading ([2], s. 6.3.3).
- Undertake aesthetic and contextual maintenance, considering adjacent land use ([2], s. 6.3.2).

The Manual supports controlled naturalization, not abandonment. The current approach of allowing unchecked cattail monocultures and potentially invasive phragmites is not supported anywhere in provincial policy or guidance.

### 4. Public Health, Safety, and Liability

The current unmanaged state raises significant health and safety risks:

- Flooding & Water Quality: Sediment and excess vegetation reduce storage, undermining the ponds' primary stormwater function ([2], s. 6.4.2).
- Mosquitoes & West Nile Virus: Stagnant water and overgrowth increase mosquito breeding; Public Health Ontario emphasizes stormwater maintenance as a key prevention tool [5].
- Ticks & Lyme Disease: Dense cattail and tall grass growth create ideal habitats for ticks. The Middlesex-London Health Unit confirms this region is a Lyme risk area [6].
- Child Safety: With a new public park to be built beside one pond, unmanaged vegetation reduces sightlines, elevating risks for children.

Now that these risks have been formally raised, the Municipality cannot later claim a lack of awareness.

## 5. Failure to Enforce Subdivision Assumption Standards

The Master Plan [1] requires that, before assumption, developers must:

- Deliver ponds free of sediment and fully operational ([1], p. 65-66).
- Provide an Operational SWM Report on vegetation, sediment, and obstructions ([1], p. 65-66).
- Include recommendations for future inspection and maintenance ([1], p. 65–67).

The lack of post-assumption inspection and maintenance represents a double failure: first in enforcing developer obligations, and second in long-term municipal stewardship.

## 6. Practices in Ontario Municipalities

Ontario municipalities, including Richmond Hill [7], Vaughan [8], and Waterloo [9], have established structured pond maintenance programs that include sediment removal, vegetation management, and public reporting.

Strathroy-Caradoc's Master Plan recognizes these same best practices but has failed to apply them. This is not a matter of discretionary cost savings; it is a failure to apply standards already acknowledged by the Municipality itself.

## 7. Resident Expectations and Property Value Impacts

These ponds were designed, approved, and marketed as integrated community features, not hidden utility basins [11]. Allowing these facilities to degrade into unmanaged swamps:

- Undermines property values.
- Breaches the design intent under which the subdivision was approved.
- Erodes public trust in municipal stewardship.

## 8. Requests for Action

We respectfully but firmly request the following actions, consistent with the Master Plan [1], provincial standards [2], and the ECA [12]:

1. Conduct a comprehensive inspection program, consistent with the Municipality's Master Plan [1], the Ontario Stormwater Management Planning and Design Manual [2], and the Environmental Compliance Approval [12]. This must include:
  - a. Formal survey of pond depths to confirm compliance with the approved 3.8 m design depth and required storage volumes.
  - b. Sediment assessments (including depth and quality) to determine dredging requirements.
  - c. Ecological inspection of vegetation, with identification of invasive versus native species, and recommendations for removal and replanting.
  - d. Water quality testing for parameters affecting stormwater performance, as referenced in provincial standards.
  - e. Structural inspection of outlet controls, embankments, and forebays to ensure operational integrity.
2. Remediation
  - a. Remove invasive vegetation and excess cattails, consistent with Master Plan requirements to keep ponds "free of invasive species" [1].
  - b. Undertake sediment removal and dredging as required by inspection results, ensuring ponds are restored to their approved capacity and treatment volumes under the ECA [12].
  - c. Repair or replace structural components (inlets, outlets, embankments, forebays) where inspection identifies deficiencies.
  - d. Implement corrective actions without delay, recognizing that failure to remediate constitutes non-compliance under the Environmental Protection Act.
3. Restoration

- a. Replant using provincially recommended, non-invasive native species, consistent with TRCA guidelines [3, 10] and the City of Toronto's SWM pond standards [4].
  - b. Ensure replanting is context-sensitive, taking into account adjacent infrastructure, the residential character of the neighbourhood, and the need for open sightlines near the upcoming public park.
  - c. Include a diverse planting strategy (native emergent plants, shrubs, shade trees, and groundcover) that balances ecological function, stormwater performance, and community aesthetics.
  - d. Prohibit the re-establishment of invasive monocultures through ongoing monitoring and selective removal.
4. Structured Maintenance Program
- a. Establish and publish a formal maintenance schedule, including:
  - b. Annual inspections (minimum) with sediment and vegetation assessments.
  - c. Sediment dredging schedule based on provincial best practices and inspection results.
  - d. Vegetation management intervals to prevent the invasive spread of invasive species.
  - e. Periodic water quality monitoring aligned with MECP guidelines.
  - f. Assign clear responsibility for long-term stewardship, with designated municipal staff or departments accountable for inspection, reporting, and maintenance activities.
  - g. Provide transparent public reporting, including posting inspection reports, maintenance logs, and upcoming schedules on the municipal website, as practiced in other Ontario municipalities.
  - h. Integrate pond maintenance into the Municipality's asset management system, ensuring long-term budgeting and compliance with both the Master Plan [1] and the Ontario SWM Manual [2].

The Woods Edge stormwater management ponds are not discretionary landscaping features. They are regulated municipal infrastructure, approved and assumed by the Municipality [13], and subject to explicit requirements under the Strathroy-Caradoc Master Plan [1], the Ontario Stormwater Management Planning and Design Manual [2], and the subdivision's Environmental Compliance Approval [12].

At present, their unmanaged condition represents a failure of compliance, a risk to public health and safety, a threat to property values, and a breach of the trust placed in Council when it approved and assumed these facilities as part of our community.

Council now faces a clear choice: either act promptly to bring these ponds into compliance with governing documents and provincial standards, or knowingly allow continued non-compliance, with the associated liabilities and consequences.

We request written confirmation of receipt of this letter, along with a timeline for inspection and remedial action.

Respectfully submitted,

Residents of the Woods Edge Neighbourhood

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## Appendix

- [1] [Strathroy-Caradoc Water, Wastewater, and Stormwater Master Plan](#)
- [2] [Stormwater Management Planning and Design Manual](#)
- [3] [Toronto and Region Conservation Stormwater Management Pond Planting Guidelines](#)
- [4] [Landscape Design Guidelines for Stormwater Management Ponds – City of Toronto](#)
- [5] [West Nile Virus Preparedness and Prevention Plan](#)
- [6] [Middlesex London Health Unit Lyme Disease Information](#)
- [7] [Richmond Hill Stormwater Management](#)
- [8] [Vaughan Stormwater Management](#)
- [9] [Waterloo Stormwater Management](#)
- [10] [Stormwater Management Pond Planting Guidelines \(Toronto and Region Conservation\)](#)
- [11] [Woods Edge Brochure](#)
- [12] [Ministry of the Environment - Environmental Compliance Approval Number 4605-9D6N3K](#)
- [13] [The Corporation of the Municipality of Strathroy-Caradoc By-Law No. 29-24](#)