

November 13, 2024

Rita Szilock MCIP, RPP, Senior Development Planner
City of Waterloo

Dear Ms. Szilock:

**RE: Official Plan Amendment, Zoning By-law Amendment & Draft Plan of Subdivision
Submission #1– Response to Comments
400 Millennium Boulevard, Waterloo
OUR FILE 8784CX**

On behalf of our client, Activa Holdings Inc., and in conjunction with Stantec (who have authored the responses to engineering and environmental comments) and other members of the project team, we have reviewed the consolidated comments provided on June 21, 2024. The following table includes the comments and a response.

City of Waterloo		
Planning Comments		
Official Plan	Response	
1. The subject lands are designated Employment on Schedule 'A' of the Official Plan and Business Employment on Schedule 'A2'. The Official Plan limits residential uses within Employment designations and contemplating non-employment uses require a Comprehensive Municipal Review (MCR).	Acknowledged	MHBC
2. As such, the Region of Waterloo undertook a MCR as part of the Regional Official Plan (ROP) Review. The employment review identified which employment lands should be included or excluded from the Regional Employment Area. The recommended Regional Employment Area framework was approved through Regional Official Plan Amendment 6 (ROPA 6).	Acknowledged	MHBC
3. The subject lands at 400 Millennium Blvd were specifically included in the Region's MCR process and recommended by Regional staff for conversion (to allow consideration for non-employment land use). City staff did not contest the Regional findings that this site may be appropriate for non-employment uses, due	Acknowledged	MHBC

to the location of the subject lands, being far removed from other employment areas within the City and located along a collector road rather than an arterial road, the site is not conducive for the visibility and access needed for larger employment uses. The Region's employment review findings were that the subject lands are not needed to meet the long-term Regional employment land use needs.		
4. Staff are pleased to see some non-residential uses incorporated through the Convenience Commercial designation to meet the day-to-day needs of residents. Additionally, staff encourage the applicant to incorporate opportunities for live-work units and low impact employment uses into the development.	The proposed RMU-20 zone permits mixed-use buildings. Further, the proposed SPA for Block 1/Stage 2 includes permissions for additional non-residential uses in a standalone building. We note that the City proposed the 'Low Rise Residential' designation for the entire property (outside the Open Space designation) in the June 2024 draft of the Official Plan, notwithstanding the active OPA. We oppose this designation for the entire property and provided separate correspondence in this regard.	MHBC
5. Staff request that in the resubmission the applicant revise Figure 5 of the Planning Justification Report by including the Stormwater Management Pond block and the environmental buffer area within the Open Space category of Schedule A. Please refer to the Environmental Planning comments for further details.	Please see the enclosed Figure 5, which proposes the Open Space designation for Block 15/Stage 1 (the SWM Block) and for the recommended buffers.	MHBC
Rural East District Plan	Response	
6. Similarly to the above, in the resubmission the proposed amendments to Map 1 of Rural East District Plan should be revised on Figure 6 of the Planning Justification Report to include the natural heritage buffers and the SWM pond within the Open Space category.	Noted – the proposed amendment to the District Plan has been revised to include the buffers and stormwater management facility within the Open Space designation.	MHBC
Zoning Comments		
Zone Boundary where Two or more Zones Exist within a Single Lot or Block	Response	
7. The applicant has requested to not have a zone boundary constitute a lot line for the purposes of zoning regulations where two or more zone boundaries exist within a single lot or block. The request is to address the Environmental Buffers (zoned OS3) located within the proposed R5, R7 and RMU-20 zones along the westerly portion of the site. Specifically, within	Acknowledged	MHBC

Further clarification is required. The revised zoning schedule and zoning amendment is not consistent with this comments.

Block 1 (Stage 3), Block 13 (Stage 1) and Block 1 (Stage 2).		
8. Staff have concerns with the request to allow the zone boundary to not constitute a lot line as this would allow the OS3 zoned environmental lands to be used to satisfy the zoning requirement of the R5, R7 and RMU-20 zones. Staff are concerned that this request would not meet the intent of the Core Natural Features designation and OS3 zone. There would be no clear restrictions to prevent property owners and homeowners from encroaching into the OS3 zone environmental lands to meet their private amenity area needs or even build structures like sheds within these areas. Therefore, staff are not supportive of the applicant's site specific request related to the interpretation of the zone boundaries.	We do not agree. The OS3 zone encompasses the natural feature limits identified through the EIS and the recommended buffer. If an additional setback were required from the limit of the buffer, it would effectively amount to a buffer from a buffer. The revised Zoning By-law Amendment proposes a site-specific setback for certain Blocks from the recommended buffer.	MHBC
9. Staff are of the opinion that the natural heritage features and associated environmental buffers should be placed within its own Block and the Block should be conveyed to the City. Please refer to the environmental planning comments for details	The owner is not opposed to placing the surveyed limits of the natural features and the recommended buffer within a separate Block or Blocks, provided that reduced Zoning setbacks are applied so as not to require a buffer from the buffer.	MHBC
10. By conveying the natural heritage features and associated environmental buffers at no cost to the City these conveyed environmental lands and associated buffers can be discounted from the total land area being used to calculate the parkland dedication requirements. For reference, please see below definition of "net land area", from the City's Parkland Dedication By-law: (13) "net land area" means the gross land area minus the land area of any environmental features and associated buffers within the gross land area that are being conveyed to the City at no cost:	Noted.	MHBC
Increase Building Height and Deck Height	Response	
11. Within the Residential Five (R5) zone and Residential Seven (R7) zone, a maximum building height of 12 m (3 storey) has been requested, whereas the By-law limits building heights to 9.5 m within the R5 zone and to 10 m in the R7 zone. Additionally, the applicant has requested to permit decks to be located 4 m above grade, whereas the By-law limits deck height to 3 m above grade. Staff would like to receive further information related to these requests a) Please provide further clarification as to the need for the additional height. Based on the submission the height in storeys	A) The subject lands have a high-water table, which restricts the ability to construct the basements of buildings below grade. As a result, typical 3-storey townhouse and detached dwellings are all above grade, rather than having one storey fully or mostly below grade (the basement). This results in a taller building height, as measured by the Zoning By-law. Front entrances to these dwellings will be accessed by	MHBC

remains unchanged at 3 storeys. Staff are wondering what the contributing factor is to the increase in height in metres if the storeys remain unchanged? A 3 storey residential building can be built within the 10 m or 9.5 m height limit. Will these units have to be walk up units to ensure building footings have sufficient clearance from the high water table? b) Staff would like to better understand the visual impact of the requested 12 metre (3 storey) singles detached homes and townhouse buildings and the proposed decks at 4 metres above grade. Please submit an elevation or cross-section to help demonstrate the need for the additional height request and to illustrate the impact of the additional height request. The elevation or cross-section should show the elevation of the high water table, the elevation of the footings, the location of grade adjacent to dwelling/deck, location/height of deck and height of building in storeys and metres. Also, show 1.2 metre side yard setback on elevation/cross-section. c) For clarity, the current deck provisions in the By-law permit decks to be located 3 metres or a full storey above grade. Thereby allowing for a walkout basement scenario where the basement is fully above grade and the deck is off of the main floor of the house. Effectively allowing decks to be off of the 2nd storey when dwelling is a walk-up with fully exposed basement. Please provide further rationale as to why the requested 4 metre deck height is needed for the proposed development. In your resubmission, please provide elevation or cross-section of single detached dwelling and townhouse dwelling illustrating proposed decks and the proposed grade around the dwellings and deck.	more stairs than a typical 3 storey dwelling. Please refer to the attached cross-section which illustrates the proposed building height and deck height in relation to the high groundwater table. The cross-sections generally can be accommodated with an 11 m building height, to allow for variation in rooflines, including peaked roofs. B) With regard to the visual impacts, the townhouse and detached dwellings will appear as three storey dwellings, which are common in new subdivisions in the City (e.g. Vista Hills) and in the Region. As the majority of the dwellings will be of similar or the same height, there would be no 'visual impact'. The lands are not developed and there are no existing dwellings or buildings on or immediately adjacent to the subject lands that would be impacted. The Carriage Crossing development to the south is separated by Millennium Blvd and includes multi-storey buildings along much of its shared frontage across from the subject lands. The requested additional height relates to the townhouse and detached dwellings only, which are internal to the subdivision. C) With regard to potential decks, they would be accessed from the second floor of the dwellings, as are many such decks. While they may be slightly higher above grade due to the aforementioned high water table, all of the dwellings would have decks off the second floor, which is common in other subdivisions where homes are either built	
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	on grade or where they have walkout basements. We propose a reduction in the deck height from 4 m to 3.5 m to accommodate a slightly taller ground floor height, which is commonly requested by new home purchasers.	
1.2 meter Side Yard Setback for Freehold Townhouses (R7 zone)	Response	
12. In resubmission, please demonstrate that appropriate access can be maintained to the rear yards of the freehold townhouse buildings. With freehold townhouse buildings it is likely that air conditioning units will be located within both side yards, limiting access to the rear of the property if side yards are reduced from 1.8 metres to 1.2 metres.	It is not necessary that air conditioning units be located within the side yard for freehold townhouse units. Most units will have their air conditioning units in their rear yards. We also note that heat pumps are becoming more common in new construction and take up less space, further reducing the need for large side yards. We do not anticipate an access issue with a 1.2 m side yard, as it has functioned in other communities developed by Activa in Kitchener and Waterloo.	MHBC
13. To remedy the above will there be reciprocal easements along the length of side yards to ensure that access can be maintained even in instances where air conditioning units are located within the 1.2 metre side yards?	Noted – easements are commonly required on end units to provide access to rear yards of internal units. The requirement for such easements can be included as a condition of approval and illustrated on the required Easement Plan.	MHBC
Permit a One Storey Unenclosed Porch Projection to a Maximum of 0.6 m in the Front/Flankage Yard	Response	
14. Staff have no concerns with this request. Please note that any stairs that are greater than 0.6 metres above grade will also have to meet these setback requirements	Acknowledged.	MHBC
Additional Planning Rationale/Justification Requested	Response	
15. There was minimal or no planning rationale provided for some of the requested amendments. In your resubmission, please provide additional rationale and justification for the following requested Zoning Amendments: a) R5 and R7 zones - increase maximum deck height to 4.0m above grade from permitted 3.0m above grade.	a) Please see above for rationale regarding the deck height. We propose a reduction to 3.5 m b) As we noted, this percentage was previously thoroughly evaluated and discussed with City staff for the same housing type in Beaver Creek Meadows. As staff was supportive of the percentage for the same housing type in a	MHBC

b) R5 zone - permit a maximum width of a garage to be 58% of the front building façade. c) R7 zone - increase maximum lot coverage for all building (Freehold Townhouses) from 40% to 55% d) R7 zone - allow a private garage to be up to 60% of the front building façade length for a FREEHOLD TOWNHOUSE or TOWNHOUSE BUILDING e) R7 zone - minimum Lot Area (Freehold Townhouses): i. Interior Lots: reduce min. lot area from 185 sq. m. to 155 sq. m. ii. Corner Lots: reduce min. lot area from 400 sq. m. to 345 sq. m.	greenfield development context and it was discussed thoroughly, we expected that staff would not need to revisit this matter again. We also note the R6 zone (Vista Hills) permits the same percentage. Notwithstanding those discussions and the established width in the R6 zone, the proposed 58% width of the garage allows for 2-car garages on smaller single detached lots, alleviating the need for tandem parking in driveways. Furthermore, as the City is aware, the Region of Waterloo is moving to a large bin collection system for household recycling and waste. These large bins will need to be stored inside garages, which in turn requires larger/wider garages to allow for this storage. c) Similar to the garage width, this matter was thoroughly discussed. An internal townhouse lot with a building that complies with all setbacks would result in a lot coverage of 55%. In this regard, the minimum 40% coverage is overly restrictive and does not allow for the efficient use of the land. d) This would permit a 10 ft garage on a typical townhouse lot, and allow for a 2-car garage on larger townhouse lots. For the smaller lots, it would permit a parking space in the garage, with storage (e.g. for the above noted large recycling and household waste bins), thereby leaving more space in the rear yard for amenity/landscaped area. The same percentage was supported in the Beaver Creek Meadows community for the same housing types. e) As discussed, the minimum frontage and area requirements do not align with a standard lot depth of 30 metres. A 5.5 metre wide townhouse lot with a depth of 30 metres results in a minimum lot	
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	area of 165 square metres. The same principle applies for corner lots. We believe this may have been an oversight in the development of the regulation.	
Block 3, Stage 1 and Block 2, Stage 3 (R7 zone)	Response	
16. These two blocks appear to contain Townhouse Buildings, please clarify if that is the intent or is the intent for these blocks to contain Freehold Townhouse Buildings? The applicable zoning regulations differ for each and in this instance if Townhouse Buildings are proposed then the Cluster Development regulations under section 3.C.10 of the Zoning By-law will also apply.	Neither Block is proposed for 'Townhouse Buildings' – they are proposed for Freehold Townhouse Buildings. In this regard, the Cluster regulations do not apply.	MHBC
17. The R7 Zone requires a parking rate of 1.4 parking spaces per dwelling unit for Townhouse Buildings resulting in a parking deficiency for these blocks. As part of the resubmission staff encourage the applicant to redesign the blocks to eliminate the parking deficiency. If a parking reduction is required for these blocks, then an appropriate parking justification should be included as part of the resubmission.	This comment is not applicable, as neither Block is proposed for 'Townhouse Buildings.'	MHBC
18. In the resubmission verify that the townhomes in these blocks meet the required 7.5 metre rear yard setback. Some of the units appear to have a slightly deficient rear yard.	No reduction in the rear yard setback is required or proposed.	MHBC
19. Block 2, Stage 3 – if Townhouse Buildings are proposed then a 7.5 metre interior lot line setback will be applicable along the shared property line with Block 1, Stage 3. The Cluster Development regulations under section 3.C.10 apply in this instance. As part of the resubmission staff encourage the applicant to redesign the block to eliminate any zoning deficiency, alternatively include appropriate planning justification for any additional amendments required.	As discussed 'Townhouse Buildings' are not proposed.	MHBC
20. Block 3, Stage 1 – 6 metre street line setback applies along Street One. Based on staff's review the street line setback appear to be slightly deficient along the north and southern property line. As part of the resubmission staff encourage the applicant to redesign the block to eliminate any zoning deficiency, alternatively include appropriate planning justification for any additional amendments required.	The Street Line setback on the corner lots will be met for the Freehold Townhouse Buildings in Block 3/Stage 1	MHBC
Block 14, Stage1; Block 1, Stage2; Block 2, Stage2; Block1, Stage 4 (RMU-20 Zone)	Response	

21. Please note that as per section 7.10.12 of the Zoning By-law the regulations of the R8 zone (including parking) shall apply to Townhouse Buildings and Stacked Townhouse Buildings within lands zoned RMU-20	Noted – based on the comments included below, we are requesting a site specific provision to have the regulations of the RMU-20 zone apply to all building types, including Stacked Townhomes.	MHBC
22. In your next submission please review the zoning compliance for all RMU-20 blocks to ensure that the proposed Stacked Townhouse Buildings and Townhouse Buildings comply with the stricter of either the R8 zone (section 7.8) or Cluster Development (section 3.C.10) regulations.	As noted above, we are requesting that the RMU-20 zone regulations apply to all multi-unit residential building types, including stacked townhomes. The Blocks and conceptual plans comply with the Cluster Development regulations.	MHBC
23. Should any additional site specific amendments be required for the RMU-20 zoned blocks please clearly identify these in resubmission and include appropriate planning rationale for additional amendments in the Planning Justification Addendum report. Staff recommend that the applicant consider a site specific amendment to not have s. 7.10.12 apply to the RMU-20 zoned lands	We concur with the noted recommendation. Separate correspondence is included with regard to other proposed site specific regulations.	MHBC
24. Based on staff's quick review of the R8 Zone regulations the following appear to be noncompliant with the RMU-20 zoned blocks: a) Parking (residential 1 space/dwelling unit + visitor 0.33 spaces/dwelling unit) b) Density (max.) 150 bedrooms/ha c) Height (max) 10 metres	Noted – we concur with applying the RMU-20 regulations accordingly.	MHBC
25. As part of the resubmission, please submit a data chart for each RMU-20 zoned block and for each R7 zoned block containing townhouse buildings. The data charts would allow staff to more efficiently review zoning compliance and identify any overlooked site specific amendments	The RMU-20 charts are included. We note the designs are conceptual and would be subject to site plan approval. The only Block where Townhouse Buildings (R7 zone) are proposed is Block 1/Stage 3. A data chart is included.	MHBC
26. Please note that if no data charts are submitted with the resubmission then staff will assume that the applicant has conducted a detailed zoning review and the proposed development will be fully compliant with all zoning requirements other than those amendments that are identified within Planning Justification Addendum report.	Relevant data charts are included. We also note the request to have the RMU-20 zone regulations apply to all building types in Blocks with that zone. It is recognized that the designs of these Blocks are subject to further refinement as the development progresses and that future minor variances may or may not be required, as site plan applications are advanced. The absence of a site-specific request at this time does not suggest that each development within each Block will be 'fully compliant' when they proceed through detailed design.	MHBC

Lot Line Setback for Blocks Containing Multi-Residential and Townhouse Buildings	Response	
27. To aid current and future zoning reviews of the Multi-Residential Blocks and Townhouse Building Blocks, staff have marked up Plan A1 - Max. Unit Yield Plan with appropriate lot line setbacks identified for the purposes of zoning review. See Appendix 4 for details.	Noted	MHBC
28. Prior to the resubmission the applicant should double check these Blocks for zoning compliance taking into consideration the lot lines identified by staff. Based on staff's review the follow additional zoning amendment may be required: a) Stage 2, Block 1 - interior lot line setback will be deficient once the environmental buffer is placed in its own block and conveyed to City. b) Block 1, Stage 3 - interior lot line setback may be deficient once the environmental buffer is placed in its own block and conveyed to City. c) Block 2, Stage 3 - interior lot line setback is deficient. d) Block 3, Stage 1 - street line setback may be deficient	a) The Stage 2, Block 1 has been revised to identify the interior lot line setback to the environmental buffer block. A site specific amendment is required to permit a reduced interior lot line setback in this condition. The proposed interior lot line setback will maintain sufficient space for access around the proposed stacked townhouse buildings and there are no overlook concerns, since the adjacent block is a recommended mitigation measure (buffer). As discussed earlier, imposing a full 7.5 m setback from a recommended buffer amounts to a buffer from a buffer and unnecessarily reduces the development potential and optimization of this Block. b) Per the design, each townhome achieves a 7.5 m setback from an interior lot line and from the dripline setback – except for the southern most townhome, which is 5.6 metres from the proposed Open Space Block. In this regard, a site specific provision is proposed for this one lot line setback. c) As Block 2/Stage 3 is planned for Freehold Townhouse Buildings, there is no 'interior lot line setback' d) The street line setback of 6 m is met for the front and flankage yards.	MHBC
Block 13, Stage 1 (R5 Zone)	Response	
29. The westerly lot within Block 13, Stage 1 will have a constrained irregular shape once the environmental buffers are placed in a separate block. As part of the resubmission, the lots within Block 13 should be reconfigured to ensure that a standard building footprint can be accommodated within this westerly lot without requiring a zoning amendment. Please	The lot has a width of 12+ metres (36+ feet), with an average lot depth of 30+ metres outside of the 10 metre dripline setback. While one side is shorter, the southerly lot line is significantly longer, allowing for building placement with a generous rear yard. The lot lines have been	

incorporate an overlay of a standard building footprint on this lot to demonstrate how a standard house would fit on the westerly lot within Block 13, Stage 1.	modified within the Block to provide additional space for each future lot.	
Additional Clarifications	Response	
30. In resubmission, please provide the number of bedrooms proposed in each block to allow staff to calculate the proposed density.	We understand this to mean the Blocks proposed to be zoned RMU-20 and/or R7 where a Townhouse Building is proposed. The house and multi-unit buildings have not been designed to the extent that interior floor plans and unit layouts are finalized. We note both are subject to site plan approval, and no request to increase density for any of the above noted Blocks is proposed or required. As no change is proposed to either zone in terms of permitted density, we do not believe this level of detail is required.	MHBC
31. Please confirm total commercial floor area proposed in Block 3, Stage 2 to allow staff to verify parking compliance. Similar to staff comment No. 26, if no data chart is submitted for Block 3, Stage 2 then staff will assume that the applicant has conducted a detailed zoning review and the proposed development will be fully compliant with all zoning requirements other than those amendments that are identified within Planning Justification Addendum report	It is premature to 'confirm' commercial floor area this early in the process. No request is being advanced for site specific parking. If such a reduction is required in the future when detailed plans are proposed, the owner will have the opportunity to file and justify a reduction through a separate planning process.	MHBC
Site Design Comments/ Draft Plan of Subdivision Comments		
North/South Trail Connection and Sidewalk along Country Squire Road	Response	
32. In accordance with the connectivity principles outlined in the City's Official Plan, the Rural East District Plan and the design principles described on page 15 of the submitted Urban Design Brief, staff request that a pedestrian/active transportation connection be incorporated along the westerly portion of the subject site (along the length of the environmental buffer). In addition, to ensure that the pedestrian/active transportation connection creates a walking loop around the development, staff request that the applicant extend the existing sidewalk along the Country Squire Rd frontage. The pedestrian/active transportation connection should be conveyed to the City. Please refer to Transportation Services' comments for further details.	We note that this trail would not provide any particular connection, other than from Millennium Blvd, which does have sidewalks and multi-use pathways to Country Squire Road, which has neither. Providing a trail within Open Space Block 6/Stage 2 from Millennium Blvd to Park Block 5/Stage 2 is possible, however it is redundant, as a connection is provided via Street Two, which is less than 100 m to the east.	MHBC

33. Creating this larger walking loop around the proposed development will enhance the walkability of the neighbourhood and it will encourage active transportation within the proposed subdivision and surrounding area.	We note the 'loop' does not enhance 'walkability' any more than the existing pedestrian routes available within the Draft Plan and in the surrounding area, as it does not lead to any particular destination. Nor does it improve active transportation, as active transportation connections are already provided to Millennium Blvd (from the Draft Plan), which allows for connections to RIM Park, Manulife Sportsplex, the East Side Library and transit and other active transportation connections on University Avenue.	MHBC
Private Servicing Easement to 515 Country Squire Rd	Response	
34. With respect to the private servicing easement proposed to provide servicing to 515 Country Squire Rd, staff recommend that Block 17 be widened to incorporate the 5 metre servicing easement. This will ensure that the servicing easement runs through City owned lands (Block 17 and the environmental buffer Block) rather than the private condominium lands.	Block 17 has been deleted. Access to the Park Block 5/Stage 2 is available directly from Street Two.	MHBC
Retaining wall along Country Squire Road	Response	
35. There is a substantial retaining wall proposed along Country Squire Road, with its highest portion at 2.2 metres above grade. At full build out the proposed retaining wall will span along the rear of 15 different properties. All efforts should be made to either remove the retaining wall or significantly reduce the height of the retaining wall.	Noted. Grading along the lots backing onto Country Squire Road will be further reviewed and adjusted as needed during detailed design stage	MHBC
36. Please advise how the maintenance of the retaining wall will occur in the future when at full build out the wall will span over 15 different properties?	Each landowner will be responsible for their own respective section of wall. This will be further confirmed during detailed design.	MHBC
Easements	Response	
37. Please submit an Easement Plan as part of your resubmission. Staff would like to better understand where access easements and maintenance easements will be located within the Draft Plan of Subdivision.	An Easement Plan is a typical requirement through a condition of approval. The revised engineering drawings illustrate where servicing easements are proposed. These will be further confirmed through detailed design and shown on the Easement Plan prior to registration.	MHBC

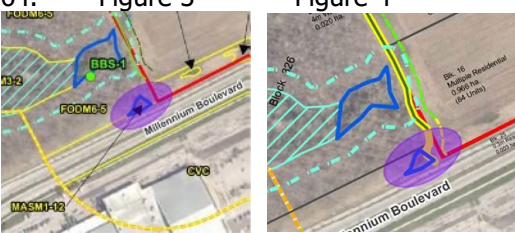
Driveways	Response	
38. Driveways shall be paired within the proposed subdivision to maximize on-street parking and opportunities boulevard trees.	Noted – this is typically addressed through a condition of draft plan approval.	MHBC
Street Names	Response	
39. As per the Rural East District Plan, street names in new plans of subdivision shall be based on a theme of “Rural Landscapes”. Please refer to Appendix A of the Rural East District plan for a list of possible street names and submit your preferred street name choices with your resubmission.	Noted – the requirement to provide street names is typically required as a condition of draft plan approval.	MHBC
Coordination of Studies and Plan	Response	
40. All plans and studies should be coordinated. Staff have noticed that block labeling is inconsistent between the submitted plans. For example, block labeling on the Draft Plan does not match the block labeling on the Max. and Min. Unit Yield Draft Plan and the references to the blocks within the proposed Site-Specific Zoning By-law.	Noted. Please refer to the revised Draft Plan submitted, which includes renumbered Blocks to accommodate the proposed Open Space Blocks adjacent to the natural feature.	MHBC
41. In your resubmission, please ensure that all submission materials are consistent and coordinated.	Noted.	MHBC
Subdivision Agreement Approach	Response	
42. Given that 400 Millennium Blvd is part of the Carriage Crossing subdivision (30T-08401) the existing subdivision agreement would apply to the subject lands. To simplify the drafting and clearance of subdivision conditions, it is the intent of staff to start on a clean slate and incorporate a clause at the beginning of the 400 Millennium Blvd subdivision agreement stating that this subdivision agreement supersedes any other existing subdivision agreement applicable to the lands.	Noted.	MHBC
Urban Design		
General	Response	
43. The design framework for the community results in a functional, walkable, mixed-use neighbourhood with thoughtful density transition, and a public realm strategy that urban design staff supports	Acknowledged	MHBC
44. Consider breaking up larger parking areas into smaller parking courts to reduce heat island effect and provide additional areas for clusters of trees and other landscaping. As stated in Sustainable Development Strategy 5.1 within the submitted Urban Design Brief (UDB), see below	Any Blocks that require or propose ‘parking areas’ will be subject to site plan approval where this comment can be further considered.	MHBC

Sustainable Development Strategy - Section 5: ENERGY AND EMISSIONS						
#	Required or Voluntary	Directive	Rationale	Implementation		
5.3	Required	Urban Heat Island: Provide vegetated landscape areas in hard surface areas associated with townhouse blocks that are subject to site plan approval.	Rationale: Vegetation can reduce the urban heat island effect to improve human comfort and energy efficiency in the surrounding areas.	Site Plan		
45. Parking areas front on streets. Staff would like to see an effort to move parking behind or beside buildings to keep out of public view					See above	MHBC
Implementation					Response	
46. As suggested on Page 17, and the Implementation section of the UDB - An overall streetscape plan should be a requirement of Draft Plan of Subdivision Approval. The Streetscape Plan will ensure a well-coordinated and visually attractive streetscape. The streetscape plan will address boulevard planting, the location of driveways, on-street parking, and pedestrian crossings.					Acknowledged, the requirement for a Streetscape Plan can be addressed through an appropriately worded condition of draft plan approval.	MHBC
47. Require on-street parking, driveways and on-street utilities to be coordinated and integrated as part of streetscape plan(s).					Acknowledged, this can be addressed through a condition of draft plan approval.	MHBC
48. Collaborate with the developer in the design and implementation of traffic calming measures with the details to be incorporated on final engineering plans to be approved by the City of Waterloo					The requirement for a Traffic Calming Plan can be secured through an appropriately worded condition of draft plan approval.	MHBC
49. Implement a Priority Lot Plan in accordance with the Priority Lot Guidelines contained within Section 8.0 of the UDB					Appropriate wording in the subdivision agreement referencing the Urban Design Guidelines can implement the Priority Lot Guidelines.	MHBC
50. The subdivider is to retain a qualified design professional who shall certify compliance with the Priority Lot, townhouse and stacked townhouse guidelines in the UDB in support of building permit applications					Please clarify who the qualified professional would be and how they would 'certify' compliance with Guidelines? The Townhouse Buildings and Stacked Townhouse buildings would be subject to site plan approval. It is not clear why this extra requirement is necessary.	MHBC
51. The design of the subdivision must be anchored by the design vision, the preferred Neighbourhood Concept Plan and related design considerations found in the UDB that include but are not limited to: a) Provide for housing types and a range of lot widths consistent with these design guidelines; b) Include zoning provisions that regulate garage projections, the maximum width of driveways and garages, require a minimum landscaped area between driveways and adjacent lots/ blocks.					The subdivision design achieves these objectives.	MHBC

c) Direct higher density forms of housing in proximity to the neighbourhood park and to locations where grades and/or block configuration is best suited for higher density d) Restrict street fronting townhouses to a maximum of 6 units per building block as per the requirements of the Zoning By-law. Please update the Urban Design Brief to ensure consistency with the Zoning By-law. e) Direct driveways to the opposite side of adjacent parks and walkways		
Environmental Planning	Response	
52. With respect to the Draft Plan of Subdivision, the buffer area identified to protect natural heritage features and functions must be placed in its own Block. In addition, and consistent with Official Plan policies 8.2.4(11) and 8.2.5 (11), the Block should be conveyed to the City. Further, and consistent with policies 8.2.4(12) and 8.2.5(12), the buffer area is not to be considered as contributing to parkland dedication requirements.	The recommended buffers have been placed in separate Blocks. Although there is no obligation to convey Open Space Blocks, the owner is prepared to convey the Blocks as a condition of draft plan approval. We note that such lands would then be subtracted from the lot area for the purposes of calculating parkland dedication.	MHBC
53. With respect to the Draft Plan of Subdivision, and specifically the proposed 5 metre servicing easement in the natural heritage buffer, it is the preference of Environmental Planning staff that the easement be located outside of the buffer to avoid encumbering the buffer and to better align with the following policy of the Rural East District Plan: 6.11.3 No development shall be permitted within woodlands and their buffer area with the exception of the following: 6.11.3.1 municipally-approved woodland management such as, but not limited to the planting of species native to Waterloo Region and the removal of invasive or diseased plant species; 6.11.3.2 provision of a community trail and associated amenities (e.g. interpretive signage); and, 6.11.3.3 underground public services; If the easement cannot be relocated, the EIS needs to be revised to address the limitations and/or constraints posed by the servicing easement. See related Comments 11 and 13 below	The owner is not proposing to service the adjacent lands. The City has requested the service connection. It cannot be provided to the adjacent property without going through both the buffer and the feature. The owner has removed the easement and does not believe it is incumbent upon them to justify the servicing connection and easement through an Addendum to the EIS when the connection is not required for the development. The City is developing the lands immediately to the west of 515 Country Squire Road. The City could provide a service connection to the lands from their own development of 2025 University Avenue, which would eliminate the need for the easement. The EIS has been updated to address impacts related to the Draft Plan and associated grading (see EIS Appendices A and G for details).	MHBC / Stantec

54. With respect to the proposed OPA, Figure 5 of the Planning Justification Report shows the proposed amendments to Schedule A. The buffer area identified to protect natural heritage features and functions needs to be included in the Open Space category. Including the buffer as Open Space on Schedule A will align with designating it as 'Parks and Other Green Space' on Schedule A3, which the report recommends on page 17. The report also recommends that Schedule A4 be amended to show the proposed park and buffer as 'Other Open Space Land Uses' (i.e. as light grey hatching), which staff agree is appropriate. Staff do, however, note that through the ongoing Official Plan Review, the light grey hatching that appears on Schedule A3 and A4 will be removed. If this change has been made by the time the proposed OPA is brought to Council for a decision, the amendment to Schedule A4 to show the proposed park and buffer as 'Other Open Space Land Uses' (i.e. as light grey hatching) will not be necessary	OPA figure has been revised and is included with this resubmission as Figure 26 and 27.	MHBC
55. With respect to the Rural East District Plan, Figure 6 of the Planning Justification Report shows the proposed amendments to Map 1. These amendments should include the addition of the natural heritage buffer into the Open Space category.	The Figure has been revised and is included with this resubmission.	MHBC
56. In the fourth paragraph on page 1 of the EIS, the unevaluated wetland is noted as being located to the west, but there is no reference to the designated Significant Woodland that is on and adjacent to the subject property. Further, Figure 2 in Appendix A labels it as "Wooded Area". This label should be revised to read "Significant Woodland" and the boundary shown should align with the Regional Official Plan mapping and the dripline staked on site.	The introduction provides a high-level review of features previously identified in the Study Area. The introduction was not meant to be an executive summary of the results of the EIS. The referenced paragraph has been updated to address the comment "... Manulife Financial Sportsplex; and an unevaluated wetland and woodland feature to the west." Note paragraph 5 speaks to the EIS addressing Project conformance with the PPS, which addresses potential impacts to Significant Woodlands. The results of the policy review and EIS identify the feature as a Significant Woodland. Figure 2 shows features in the context of Section 4.3 of the EIS (background review data, i.e. secondary source data, not existing conditions) and shows LIO provincial data. Wooded Areas is a LIO data layer that was added to the figure to show natural	Stantec

	heritage features identified by the province. Section 4.3 and 4.7 speaks to the evaluation of previously identified features for significance.	
57. One of the footnotes on page 5 of the EIS notes that "Due to the timing of the application submission, the results of the fall botanical surveys will be included in an updated version of this report or addendum." Based on the comments provided by the City, GRCA and Region, a revised EIS will need to be submitted. Please ensure the results of the fall botanical surveys are included in that revised EIS.	Acknowledged, the report has been updated accordingly.	Stantec
58. Near the top of page 20 in the EIS, it is stated that "Core Natural Features are mapped adjacent (west) of the Subject Lands." Based on the mapping used in the Regional Official Plan and mirrored in the City's Official Plan, and as confirmed through the dripline staking, a portion of the Core Natural Feature (i.e. Significant Woodland) does extend on to the subject property. Also, towards the bottom of page 20, Supporting Natural Features are discussed. For clarity, Significant Wildlife Habitat is a Supporting Natural Feature, as are Other Wetlands.	Acknowledged, the report has been updated accordingly.	Stantec
59. On page 22 of the EIS, at the end of Section 4.3, it is stated that "No other natural heritage features or areas, as defined by the PPS, have been previously identified in the Study Area." Staff note that in the EIS that was completed in 2008, it was stated on page 5.4 that "the woodland on the western part of the subject lands provides significant wildlife habitat for breeding amphibians."	The second bullet states that the woodland feature has been previously identified as Significant Woodlands (Stantec 2008). The title of the bullet has been updated for clarity / up front communication of the significance of this feature.	Stantec
60. Candidate and confirmed Significant Wildlife Habitat are discussed on pages 30-31 of the EIS. Significant Wildlife Habitat should also be mapped on Figures 3 and 4 of Appendix A.	Detailed locations of the confirmed and candidate SWH were not completed as part of the assessment. It is known the SWH (candidate and confirmed) is confined to the limits of the feature (Significant Woodlands / Swamp system). It is Stantec's opinion that it is inappropriate to map the exact locations, when additional detailed investigations have not taken place to further refine boundaries. The SWH will not be impacted and buffer has been applied to support long-term protection.	Stantec

61. Recommended mitigation measures are outlined on pages 33-34 of the EIS, and include erosion and sediment controls, buffers, an Edge Management Plan and timing windows for breeding birds. Minimally, recommendations related to invasive species and lighting should also be included.	Acknowledged, Section 6.3 has been updated accordingly.	Stantec
62. The proposed natural heritage buffers are discussed on page 34 of the EIS. Minimal discussion/analysis is provided to demonstrate the technical basis of the proposed buffers and how the proposed widths will ensure the protection of the natural heritage features and their ecological functions. For example, there is no discussion related to grading encroachments, ability to accommodate tree and/or limb fall, or the drainage swale outfall that is proposed at the dripline. Further, the discussion presented does not address the limitations or constraints that the proposed 5 metre servicing easement could pose. The EIS needs to be revised accordingly.	The 5 m servicing easement is no longer proposed as part of the development. Additional discussion has been provided in Section 6.3.3.	Stantec
63. The MASM1-12 community, circled in purple below, is not accounted for in the proposed wetland buffer discussed on page 34 of the EIS and shown on Figure 4 of Appendix A. The EIS needs to be revised accordingly.	The report and figures have been updated accordingly.	Stantec
64. Figure 3 Figure 4  Legend - Subject Lands - Study Area (120 m) - Woodland Feature Limit (Stantec 2023) - Woodland Dripline (Staked by City and Region, June 14, 2023) 10 m Setback from Woodland Dripline 10 m Setback from Woodland Feature Limit 15 m Setback from Wetland - Proposed Development - Provincially Significant Wetland - Wetland - Not evaluated per OWES - Wetland (Staked by GRCA and Stantec, June 14, 2023)	See above.	Stantec
65. The proposed Edge Management Plan is discussed on page 34 of the EIS and included as Drawing L-101 in Appendix G. While the details of the Edge Management Plan will be determined at the detailed design stage in accordance with conditions of draft plan approval, consideration needs to be given now to if and how the implementation of the Edge	The 5 m easement is no longer proposed. The Edge Management Plan will be updated accordingly at the detailed design stage. Invasive species management has been recommended in the updated EIS.	Stantec

Management Plan will be impacted by the proposed 5 metre servicing easement (e.g. timing of planting, restrictions on planting, recommendations for servicing installation, etc.). The EIS needs to be revised accordingly.		
66. Environmental Planning staff understand that Transportation Services staff have requested a north-south pedestrian/active transportation connection (i.e. a trail) along the westerly portion of the development. If the trail is to be accommodated within the buffer, the EIS will need to be revised to incorporate consideration of the trail.	The development does not propose a trail – please see previous responses.	Stantec
67. It was noted through the pre-submission consultation process that monitoring in accordance with the City's Development Monitoring Protocol was required. It was also noted a proposed Terms of Reference for the pre-construction stage needed to be submitted for review and acceptance and that staff anticipated the monitoring program could likely be informed by and/or make use of the monitoring data that was collected on site prior to 2011. To date, a Terms of Reference has not been submitted. While Section 8.9 of the Functional Servicing and Stormwater Management Report (dated November 2023) states that a detailed during-construction (Stage II) and postconstruction (Stage III) monitoring plan will be prepared for the proposed SWMF during detailed design, this will only address the SWMF component of the requirement monitoring. Details related to how the pre-, during- and post-construction stages of the terrestrial/biological and groundwater components will be addressed remain outstanding. Staff do, however, anticipate that the eight monitoring wells installed in March 2022 and three drive-point piezometers installed in April 2023, as outlined in the Hydrogeological Technical Memorandum, Supplementary Groundwater Monitoring and Wetland Assessment (dated October 2023), will be used to address the pre-construction groundwater monitoring component.	Note, an EIS TOR was prepared and sent to and approved by agency reviewers (City, Region and GRCA). A groundwater monitoring Terms of Reference (TOR) will be prepared as per City of Waterloo's Engineering and Landscape Manual (Volume 2: Process) protocols for the Stage I (pre-construction), Stage II (during construction) and Stage III (post-construction) phases of the development. Groundwater levels and chemistry will be monitored at the Subject Property, with this TOR prepared during detailed design. Stantec notes that Stage I monitoring of groundwater levels in the eight on-site monitoring wells (MW101-22 to MW108-22) and three wetland drive-point piezometers (DP101-23 to DP103-23) started at the Subject Property in March 2022 and April 2023, respectively, and is currently on-going at the time of this submission (refer to revised Hydrogeological Technical Memorandum for the results of this groundwater level monitoring up to July 2024).	Stantec
68. Environmental Planning staff acknowledge that, as outlined in CAO2024-008, Activa is conveying the adjacent property that contains a large portion of the Significant Woodland to the City as part of the transaction involving the remnant parcel on Millennium Boulevard.	Noted.	Stantec

Transportation Services		
Draft Plan of Subdivision	Response	Responsibility
69. As part of the resubmission, right-of-way cross section drawings shall be provided. Please refer to the Comprehensive Engineering and Landscape Manual (CELM).	Cross-sections are included. The approval of cross sections can be secured through an appropriately worded condition of draft plan approval.	MHBC
70. Traffic calming measures shall be included in the final road design.	Acknowledged. The requirement for a Traffic Calming Plan can be secured through an appropriately worded condition of draft plan approval.	MHBC
71. All daylight triangles at corner lots, intersections and roundabouts shall be conveyed to the City.	The City has Zoning regulations for daylight triangles for corner lots. No change to these regulations are proposed. Daylight triangles are proposed to be conveyed as part of the road allowance at the intersection of Street Two and Millennium Blvd and Street Three and Millennium Blvd. The lands required for the roundabout at Crossgate Blvd and Millennium Blvd were secured when the Carriage Crossing subdivision was registered, which included the subject lands.	MHBC
72. All streets will have a posted speed of 40 km/h as per the City of Waterloo Speed Management Plan.	Noted.	MHBC
73. As part of the resubmission an Active Transportation Plan shall be submitted indicating if streets will have sidewalks/MUPs.		MHBC
74. Prior to final approval, a driveway location plan shall be submitted to the satisfaction of the Director of Transportation.	Acknowledged, the requirement for a driveway location plan can be secured through an appropriately worded condition of Draft Plan Approval.	MHBC
75. Prior to final approval, a traffic calming plan shall be submitted to the satisfaction of the Director of Transportation.	Acknowledged. The requirement for a Traffic Calming Plan can be secured through an appropriately worded condition of draft plan approval.	MHBC
76. Staff appreciate the walkway connection shown in block 16. In the resubmission, a mid-block connection to Country Squire Rd should also be incorporated.	A walkway connection to Country Squire Road is not required. There is no pedestrian infrastructure on the rural cross section, nor any streetlights. There is pedestrian infrastructure within the development that provide safe connections to the internal Park, SWM pond and Millennium Blvd.	MHBC
77. A 1.8m sidewalk shall be constructed along Country Squire Road at the cost of the	The owner does not support this new sidewalk. The sidewalk does not lead	MHBC

developer. The offset location from the property line shall be determined by the landscape planting buffer.	to any destination, other than back to Millennium Blvd. The Draft Plan includes multiple pedestrian connections to Millennium Blvd and in turn, the other key destinations in the area (RIM Park, East Branch of the Library, Manulife Sportsplex, commercial plaza). A sidewalk on Country Squire Rd does not improve any of these connections.	
78. An additional north-south pedestrian/active transportation connection should be provided between Millennium Rd and Country Squire Rd. The pedestrian/active transportation connection should run along the westerly portion of the development, parallel to the woodland/wetland buffer or potentially within in the woodland/wetland buffer subject to environmental analysis.	This connection is not required. The Draft Plan includes internal connections to the Park Block and to the SWM Pond.	MHBC
Transportation Impact Study	Response	Responsibility
79. If the scope of the application changes an updated TIS may be required.	Noted – the scope is not proposed to change.	Paradigm
80. Staff request an updated signal warrant analysis at the University Avenue at Millennium Boulevard intersection with more recent traffic counts. There are inconsistencies between the turning movement count volumes shown in the TIS compared to the most recent counts the City has. The City requests that the warrant analysis be run again utilizing the most recent counts. Please contact traffic@waterloo.ca for this information.	Paradigm contacted City staff in early July 2024 and obtained the revised traffic counts identified by staff. The City counts conducted in April 2023 showed that while the AM peak hour values were quite similar, the through volumes on University Avenue during the PM peak hour were somewhat higher than the December 2022 counts while the turns to and from University via Millennium Boulevard were quite similar. The updated analysis confirmed that traffic signal control is not justified through 2036. Please see enclosed letter from Paradigm.	Paradigm
81. RIM Park Lane and Park Road are driveway accesses/private roads to access the Golf Course and RIM Park. These are not alternatives for drivers turning left onto University Avenue. The Street Two at Millennium Boulevard intersection shall be redesigned to incorporate the eastbound left-turn lane as warranted in the TIS. This design should also include elements to restrict drivers from travelling straight through to RIM Park Lane from Street Two. Examples of designs have been provided below. The applicant shall provide preliminary designs for this improvement. All works shall be at the cost of	Please see the enclosed letter from Paradigm that provides a response to this comment. In Paradigm's opinion, the use of Park Road offers little advantage to area residents over Millennium Boulevard. Further that restricting movements at the intersection of Street Two with Millennium Boulevard will have unjustified and negative impacts on existing system users including area residents and patrons of RIM Park.	Paradigm

the applicant. The design must consider winter maintenance operations.



82. Staff note that an extension of the west-bound right-turn lane at University Avenue and Millennium Boulevard is warranted. All costs related to design and implementation is the responsibility of the applicant.	There exists sufficient platform width to extend the westbound right turn lane via a re-striping exercise. Please see enclosed letter from Paradigm.	Paradigm
Development Engineering	Responses Provided by Stantec	
General	Response	
83. The following comments are required to be addressed prior to Draft Plan Approval. Please ensure that comments are addressed and provide a comment response specific to engineering items (i.e., not to be completed by others).	Please see responses below.	
84. The City of Waterloo's Development Engineering Manual has been superseded by the Council approved Comprehensive Engineering and Landscape Manual (CELM) located: https://www.waterloo.ca/en/government/development-engineering-manual.aspx	Noted. Engineering design reviewed in conjunction with CELM.	
85. The applicant should follow the most up to date version of the CELM at the time of Development unless otherwise directed by the city.	Noted.	
86. Please ensure that comments are addressed and provide a comment response specific to both engineering and landscape items. A fully	Acknowledged, submission materials coordinated with project team.	

coordinated submission with written response to all comments will help expedite review.		
87. The City of Waterloo now has a Combined Linear Infrastructure – Environmental Compliance Approval (CLI-ECA). Details on the CLI-ECA may be found on the city's website located: https://www.waterloo.ca/en/living/water-utilities-alterations.aspx	Acknowledged – CLI ECA applications will be prepared as part of the Detail Design stage of the subdivision.	
88. If proposed infrastructure does not meet design criteria in the city's CLI-ECA, the city does not have authority to approve it. These exceptions require the developer's consultant to go directly to the MECP for approval	Acknowledged – see response to Comment 87.	
89. Complete "Revision/ Issue" section of drawings	Revision/Issue block completed for resubmission.	
90. Minor drawing issues including label overlap will need to be addressed during detailed design stages.	Acknowledged. Label overlap has been addressed as part of this submission.	
91. Retaining walls should be avoided where possible. When required, retaining walls must be located entirely within private property	Acknowledged – where grading transitions require retaining walls, the retaining wall will be located 0.15m into private property. Further review will be done a detailed design stage to mitigate the use of retaining walls.	
92. Remove reference to the Development Engineering Manual (DEM) in sections 8.1 and 8.9. The DEM has been superseded by the Comprehensive Engineering and Landscape Manual at the City of Waterloo. Development Monitoring may be found in CELM Volume 2 Section 8 and appendix V2-E Development Monitoring Protocol.	Report references to DEM have been replaced by relevant references and details from CELM	
Servicing	Response	
93. Ensure the servicing easement for Block 1, Stage 3 is clearly shown on the General Servicing Plan (Drawing C-100).	There is no servicing easement required for Block 1/Stage 3. The servicing easement for lands to the west has been eliminated. A service to the existing property located to the west of this development will not be provided.	
94. The current plan indicates condominium water service routing through the easement. The city will not approve this configuration. Please relocate all condominium service infrastructure outside the designated easement area.	Watermains are no longer routed within easements.	
95. The city may require servicing stubs be brought to the western property line in the servicing easement within Block 1, Stage 3 during detailed design	Acknowledged.	

96. The minimum slope for the first reach of permanent dead-end sewers shall be 1%, where feasible per DGSSMS B.4.2.4 Pipe Slope. Revise or provide justification for shallower pipe slopes.	Acknowledged. This has been addressed. Please note that further confirmation will be done at detailed design stage.	
97. The minimum service slope for a catch basin is 2% per DGSSMS B.4.5.3 Slope. Revise or provide justification for shallower pipe slopes.	Acknowledged. Slope for catchbasins within the municipal right-of-way has been set to minimum 2%. RYCBs adjacent to Country Squire Road (Stage 1, Blocks 1 and 2) are lower than 2% due to shallow cover at the rear of walkout units.	
98. At a functional level, the city supports the proposed stormwater, sanitary, and water servicing in the subdivision, with detailed comments to follow during detailed design.	Acknowledged.	
99. Storm and sanitary services passing from Street Two to Street Three through Block 2, Stage 2 is not preferable to the city. If the servicing can not go around via Street One, a servicing easement is needed for all city infrastructure passing through Block 2, Stage 2.	Servicing easement provided on drawings between Street Two and Street 3. Servicing cannot be routed to Street 1 due to cover limitations.	
100. The city will not accept a city watermain line passing through Block 2, Stage 2. Only one municipal connection will be allowed, either from Street Two or Street Three.	Watermain in Block 2, Stage 2 is capped at property line from Street Two – intended to service only Block 2.	
Stormwater Management	Response	
101. Revise the design to include a ramp in the secondary cell of the pond. Controlled access routes for maintenance vehicles should be provided to both inlet and outlet structures and forebays	Pond design adjusted to accommodate ramp into secondary cell.	
102. The trail/maintenance access within the pond block needs to be a minimum of 4.0m wide.	Through correspondence with the City of Waterloo (August 15, 2024), it has been agreed upon that the trail/maintenance access can remain as 3m in width.	
103. A turning analysis is required for draft plan approval to ensure maintenance vehicles have sufficient access to the pond. A minimum inside turning radius of 10m and a flat 10m loading area are needed within the SWM block. Maintain a maximum slope of 10:1 for maintenance access routes.	Through discussions with the City of Waterloo (August 09, 2024), it has been concluded that a turning analysis is not required as the revised design provides a minimum inside turning radius of 10 metres and a maximum slope of 10:1. Furthermore, it was discussed that the 10 metre flat loading area is not required as sediment loading during the maintenance activities of the pond can be performed using the already provided trail/maintenance access.	

Road and Grading	Response	
104. Please provide typical sections for each road with the next submission	Cross sections included on the revised Plan and Profile drawings.	
105. Include labels for seasonally high groundwater and proposed basement elevations on the General Grading Plan.	The approximate high groundwater levels are shown on the Plan and Profile drawings based on the Hydro-G Study. At the detail design stage, elevations of basement/finished floor will be confirmed such that the required separation distance from the SHGWL is provided.	
106. Per CELM Table V5-1 Lot Grading & Drainage Criteria, the maximum embankment slope is 4:1. Provide justification if a steeper slope is unavoidable.	4:1 maximum sloping included for resubmission. In cases where 3:1 slope is shown on Site Plan Blocks. This is to be further reviewed and adjusted as part of the Site Plan Approval process.	
Retaining Wall	Response	
107. Reduce the size of the retaining wall in the northwest corner of the subdivision as much as possible. All retaining walls must be designed and stamped by a geotechnical engineer and selected materials must be accepted by the city.	Acknowledged. The grading in this area as well as the retaining wall will be further reviewed as part of the detailed design stage.	
108. Provide a plan for retaining wall maintenance and access. Demonstrate how homeowners will be informed about retaining wall ownership and maintenance obligations, whether through a common condo element or other means.	At the detail design stage the retaining wall access and maintenance will be determined.	
Landscape Architecture	Response	
109. Please note that all current Site Plan, Subdivision and Capital Project applications and development processes have been compiled into the recently implemented City of Waterloo Comprehensive Engineering and Landscape Manual (CELM). Please visit the CELM (https://www.waterloo.ca/en/government/development-engineering-manual.aspx) for all standard guidance, standards and requirements. All forthcoming submissions shall meet the requirements/follow the processes set out in the CELM.	Noted – comment made previously.	
110. Please ensure that comments are addressed and provide a comment response specific to landscape items. A fully coordinated	Noted – comment made previously.	

submission with written response to all comments will help expedite review.		
111. The subject development area consists of mostly agricultural land and will result in the removal of a limited number of existing trees. These appear to be located in the south portion of the site, adjacent to Millennium Boulevard. Per the City's policy to replace existing trees that are removed to facilitate development and further to the pre-consultation comments, proposed tree removals should be identified as part of the detailed design process. Additionally, there are several recently planted City trees on the north side of Millennium boulevard, along the entire south side of the proposed development. Pending site servicing, phasing and construction staging for the subdivision, tree protection measures may be required in order to protect any existing City trees that are within immediate proximity of future works. Both existing trees to be removed and potentially impacted City trees should be captured in the form of a Vegetation Management Plan, during the detailed design stage.	Noted – the requirement for a Vegetation Management Plan can be secured through an appropriately worded condition of draft plan approval.	
112. There is a separation between the open space elements within the subdivision (SWMF and Park Blocks). To improve connectivity between the spaces, City Staff recommend that the pedestrian experience is enhanced between the SWMF and the Park. Considerations include but are not limited to the following: a) Widened sidewalk along the Townhouse Blocks connecting the SWMF and Park b) Pedestrian crossings along this walkway alignment c) Wayfinding Signage within the SWMF and Park Blocks emphasizing the connection These opportunities can be further explored at the detailed design stage.	Noted – Streets Three, Two and One provide connections between the Park and SWM Blocks, as does Millennium Blvd, which already contains pedestrian infrastructure.	
113. Based on the 18 and 20m cross sections proposed, ample space should be available for the incorporation of street trees into the future boulevards. These details are to be demonstrated through the detailed design stage in accordance with City standards and requirements. Every effort should be made during that detailed design coordination to maximize tree planting within the context of	Noted.	

site servicing constraints and will be required as a condition of Draft Plan Approval.		
Block 4 - Park	Response	
114. Staff has reviewed the proposed park block in terms of overall area, location, orientation and preliminary grading within the subdivision and finds it to be acceptable. Based on the size of the park block and proposed general grading and considering the adjacent community facilities (RIM Park sports fields), City Staff would like to see some specific amenities provided in the Neighbourhood Park that are complementary to the current context and appropriate to the scale of the development. The Urban Design Brief should include language in the Neighbourhood Park section that lists the following program elements to be considered in the future design: a) Walkway loop with provisions for connections to buffer trail b) Shade tree planting c) Junior and senior play area/play structure d) Seating node with shade structure e) Multi-sport court f) Adult fitness equipment g) Open lawn area	The requirement for a Park Plan can be secured through an appropriately worded condition of draft plan approval, or through the submission and approval of final Urban Design Guidelines, also as a condition of draft plan approval.	
115. Provide a Park Landscape Concept that demonstrates the feasibility of the program elements noted above. This will be a condition of Draft Plan Approval.	Noted.	
Block 15 - SWMF	Response	
116. Based on a review of the General Grading Plan, the layout of the pond will require refinement at the detailed design stage to ensure conformance with the CELM (In addition to any Engineering comments/requirements provided by City Staff). Please refer to section 3.2.5 of the CELM for requirements related to SWMF trail layout, buffer from property lines, width, access, planting and associated amenities for implementation at the detailed design stage. The revised General Grading Plan should reflect these considerations. Some specific items noted by Staff for further consideration include the following: a) Trail Amenities: As per CELM 3.2.5, the trail surrounding the stormwater management facility should include	a) Trail amenities will be implemented during detail design process as requested. b) i) Trail buffer incorporated into resubmission design. Described in greater detail under c), below b) ii) Increased trail offset for mature growth accommodated in resubmission design. Planting to be developed during detailed design stage b) iii) Planting species to be developed during detailed design stage	

amenities like standard benches, trash receptacles, bike racks, and/or access points during detailed design. These amenities should be strategically placed for optimal use. b) Trail Offsets: The current design doesn't meet CELM V7: 3.2.5.10 Buffering requirements. Consider the following: i. A minimum 3.0m buffer is required between the trail and the property line or top bank of the open space. ii. When planting trees and shrubs, consider a 2.0m offset from the trail edge to accommodate mature plant growth. Maintain a 1.0m clear mow strip on both sides of the trail. iii. The City of Waterloo encourages planting trees along the trail for shade. c) Sidewalks Adjacent to Trail: Further to the above regarding 3m minimum buffer between trail and property line, the current plan provides limited space between the pond trail and the abutting sidewalks. Revised plan should demonstrate increased offsets to allow for tree planting and buffering between the street and the pond.	c) Revised stormwater pond block provides 2.5 metres from trail edge to property line. Further expansion of grassed area interferes with pond capacity requirements in conjunction with the greater stormwater strategy (including Carriage Crossing ponds, previously constructed)	
Woodland Buffer	Response	
117. Refer to Environmental Planning comments regarding the creation of a separate Block for the woodland feature and associated buffer.	Noted. Please refer to the revised Draft Plan.	
118. Staff notes that a 10m dripline setback has been shown from the staked woodland feature flanking the west portion of the subject lands. Provide a trail along the length of the buffer from Millennium Boulevard to Country Squire Road (refer to comments provided by Active Transportation Services for more information). EIS is to be updated accordingly with consideration for this connection and associated impacts required to accommodate City trail standards. Final material, layout and grading etc. will be determined through the detailed design stage, but feasibility of the trail along the buffer shall be demonstrated on the functional grading plan, prior to Draft Plan Approval. The trail shall be designed in accordance with the CELM and in consultation with the City's Environmental Planning, Landscape Architecture, Engineering and Active Transportation Staff. It should also be	A trail is not proposed. See previous comments.	

located as far as possible from the feature dripline while adhering to CELM standards.		
119. Staff have reviewed the woodland buffer Landscape Plan and Details, prepared by Stantec and appended to the EIS. Generally, the plan is acceptable in terms of species selection and density. Staff recommend the following refinements to the plant list: a) Introduce a range of tree stock between 100cm ht. and 60mm caliper trees (e.g. 40mm cal., 250cm ht., 150cm ht.) b) Introduce some caliper Oak species c) Include Ironwood trees (Eastern Hop-hornbeam) d) Shift Beech trees away from outside edge of buffer as much as possible.	Acknowledged; the Landscape Plan will be updated accordingly at Site Plan / Detailed Design.	
120. Please note that refinements to the buffer Landscape Plan will be required through the detailed design stage, pending proposed trail alignment review/coordination as well as inputs from Engineering and Environmental Planning Staff related to the constraints of the proposed servicing easement within the east-west section of the buffer. The plan is also subject to review by Forestry Staff at the detailed design stage and prior to final approval.	Acknowledged.	
121. Additionally, the buffer Landscape Plan stipulates protection and management of existing trees during the construction timeline; however, edge management should also outline a stewardship plan to be implemented following construction works for the purposes of monitoring and mitigating potential tree hazards that may arise in proximity to future residential, park or trail lands	This will be covered in the construction package stage through specifications for tree management and protection and maintenance and warranty for the trees.	
122. Per CELM requirements, the woodland feature and associated buffer/trail shall be delineated with a chain link fence to prevent encroachment from adjacent residential blocks. This requirement can be demonstrated at the detailed design stage.	Acknowledged. City to confirm through detailed design if they require a chain link fence between Park and Open Space Block.	
123. Proposed Walkway Block 17 connecting Street One to the Park Block may require refinement pending servicing easement constraints and the coordinated location of the trail and buffer. The park connection will likely be completed by way of the buffer trail. This item can be coordinated through the detailed design stage, but feasibility of the trail and associated walkway block and servicing	The Block has been removed. The Park Block is accessible directly from Street Two.	

easement will be demonstrated as part of the resubmission (refer also to comments provided by Engineering Staff related to the servicing easement).		
Country Squire Road	Response	
124. Refer to comments provided by Active Transportation Services as it relates to the requirement for a 1.8m sidewalk along the south side of Country Squire Road.	The owner does not support this connection or the installation of sidewalks on a rural road. The 'loop' provides no benefit for walkability or active transportation connections beyond those which already exist in the planned subdivision or on Millennium Blvd.	MHBC
125. Considering the future sidewalk condition along Country Squire Road, City Staff would also like to see walkway block connections from the subdivision to Country Squire. Currently, the plan proposes Walkway Block 16 between blocks 4-7, as a mid-block connection. Staff note in addition to this mid-block connection, a connection to Country Squire Rd would be beneficial and provide continuous pedestrian routes through the subdivision. Potential connection opportunities are as follows: a) Walkway block as an extension of Street 3 through Residential Block 1 (Stage 1) b) Walkway block as an extension of Street 2 through Blocks 4 and 5 (Stage 1) and Block 2 (Stage 1) Please consider the feasibility of these connections and demonstrate them on the revised Draft Plan.	Per earlier comments, the owner does not support this connection or new sidewalk.	MHBC
126. Per comments provided at pre-consultation, the City will require a landscape treatment along the south side of Country Squire Road. Considering the rural cross section of Country Squire, it is anticipated that there will be a small ditch separating the gravel shoulder and the new sidewalk which will not be conducive to tree planting. As an alternative, the City will require a planted landscape condition on the south side of the sidewalk, between the sidewalk and the property line, creating a buffer between the flanking rear yards and the road. Pending grading, retaining wall and space constraints, this landscape strip should contain a combination of shrub and perennial planting as well as intermittent shade trees and be delineated by post and wire farm fencing (or an	The requirement for a landscape plan along this interface can be addressed through an appropriately worded condition of approval, taking into consideration some of the grading challenges. The submitted Urban Design Brief referenced the proposed landscape treatment along this interface.	MHBC

approved alternative) along the property line. This treatment can be coordinated through the detailed design stage, but provision/feasibility of the sidewalk and associated landscape strip will be demonstrated through plans and cross-sections as a condition of Draft Plan Approval. Per the pre-consultation comments, please provide a conceptual landscape treatment reflective of these requirements as part of the resubmission.		
Parks, Forestry and Cemetery Services	Response	
127. Where public lands abut private lands, a chain link fence should be provided on City lands without a provision for gates for access from private lots. Specific areas: a) Around the stormwater management pond (Stage 1 between Blks 14 and 15) b) Adjacent to the woodlot (Stage 1, Blk 13; Stage 2, Blk 1; Stage 3, Blk 1)	For clarification – the City requires a chain link fence along the shared Block line boundary between Blocks 14 and 15 and along the entire boundary of the Open Space Blocks – even the boundary between Park Block 5/Stage 2?	MHBC
Building Standards	Response	
128. Ensure compliance with Building Code article 7.1.5.4 Shared Services.	Shared services are not proposed.	MHBC
129. Where shared services are proposed between properties, support of a shared servicing agreement should be obtained by the Director of Engineering at the earliest stages of development.	Shared services are not proposed between properties.	MHBC
130. Where new sanitary service are installed for an existing dwelling on adjacent lands, a septic decommissioning permit is required through the building department.	Activa Holdings Inc. is not proposing a service connection to 515 Country Squire Rd. Any requirements related to matters pertaining to existing services on 515 Country Squire Rd are the responsibility of that property owner.	MHBC
Economic Development	Response	
131. The subject property was considered as part of the Comprehensive Municipal Review (MCR), undertaken by the Region of Waterloo. The MCR recommended that the subject property would be appropriate for conversion considerations, to allow non-employment land uses. The current proposal is to redesignate the lands from Business Employment to a mix of Residential, Commercial and Open Space designations.	Agreed.	MHBC
132. The study undertaken by Urban Metrics for the City's Official Plan review identified that it is unlikely the existing supply of employment lands can support the 10,200 employees	No response required.	MHBC

projected by the Region. This means that the City will need to rely upon intensification predominantly for the bulk of its future employment land.		
133. These lands are located within a minor corridor and lands within corridors designated for residential or employment uses may include a limited amount of commercial uses, as described in appropriate land use designations.	Noted.	MHBC
134. The consideration of integrating jobs and employment opportunities is always something we encourage in any development and the opportunities for this is something we strongly encourage and support in the proposed development.	The development includes permissions for commercial uses.	MHBC
Comments From Members of the Public	Response	
135. Staff appreciated the applicant's help in addressing comments received from members of the public prior to the Informal Public Meeting. The below is a summary of comments received from members of the public after the Informal Public Meeting. In your resubmission, please address the below comments received from members of the public: a) <i>Concerned that natural habitat area is being converted into a residential zone. The proximity of the land to the shores of Conestoga river creates a natural sanctuary for the variety of species, some of which are protected by law. The land is the home to deer, beavers, opossums, wild turkeys and variety of other birds. By permitting construction on this site, not only cherished habitat will be destroyed, but further, the noise and pollution will affect all the species living on the shores of Conestoga river.</i> b) <i>Concerned that the proposed development does not have any road or pedestrian connections to Country Squire Road. This decision impacts the developments success in reaching it's goals, notably "pedestrian connectivity". For example, a person living in the North part of the proposed development who works at BlackBerry would be able to bike or walk along Country Squire, and use the hiking trail connecting to Millennium Blvd. This route would not only be faster, but less busy for a cycle/walking commuter. At</i>	A) There are no lands within the Core Natural Feature designation that are proposed for residential development. B) The City's policies do not permit vehicular connections to Country Squire Rd, which has a rural cross section. The route to the Northfield Technology Campus via Country Squire Rd and Country Squire Lane is similar in distance to a route taken through the development, out Street Two and along Millennium Blvd. We also note that Country Squire Rd does not have bicycle lanes, does not have streetlights and does not have sidewalks through to Country Squire Lane, making is less desirable and safe than a route via Millennium Blvd.	MHBC

<i>bare minimum, a pedestrian/cycle connection should be added.</i>		
Grand River Conservation Authority		
Recommendation	Response	
The GRCA recommends that draft plan approval is deferred to allow the applicant to adjust the draft plan based on GRCA Comments	The Draft Plan has been revised to include the feature and recommended buffer within Open Space Blocks.	MHBC
GRCA Comments	Response	
1. Stage 2, Block 1 is shown as encompassing the 15 metre setback from the wetland. The block must be adjusted outside of this buffer to ensure its long-term protection, and allow the GRCA to snap the Regulation Limit to the lot line.	An Open Space Block has been added to encompass the feature and recommended buffer. Please refer to the revised Draft Plan.	MHBC
2. The Environmental Impact Statement (EIS) update requires more details and discussion on the wetland water balance information provided in the stormwater management (SWM) report. Details on the quantification of the predicted changes in hydrology, and the potential for these changes to impact the wetland community, based on degree of change and community sensitivity are requested. a) This should include consideration for the water balance's assumption that runoff does not occur on months with negative average temperature; previous and impervious runoff in those months is non-zero. b) It is requested that a minimum of one year of piezometer data is collected for characterization the hydrology of the wetland on site. Only one month of data was used in the submitted reports.	The proposed wetland water balance strategy for the site is to direct the parkland and a portion of clean landscaped / rooftop runoff to the wetland with the goal of maintaining monthly surface water runoff rates from pre- to post-development. As a portion of the post-development runoff comes from impervious surfaces, the post-development runoff during the summer months is non-zero, resulting in a slight runoff surplus. However, the water balance analysis does not consider the interception of this impervious runoff over pervious area prior to entering the wetland under post-development, thus reducing the monthly runoff rates during the summer months. a) The Water balance is updated such that runoff will not occur during months with negative average temperature. b) The Hydrogeological Technical Memorandum (Stantec, 2024) has been updated and now presents groundwater and surface water elevation data collected from the wetland drive-point piezometers for the period extending from April 2023 to July 2024 (15 months of data). c) The EIS has been updated to include discussion surrounding the	Stantec

	results of the Hydrogeological Technical Memorandum.	
3. Please revise the SWM report to speak to how the regulatory storm would be conveyed through the subdivision	Acknowledged, a conveyance analysis will be completed to show that the regulatory/100-year storm can be conveyed through the subdivision. Major flow discussion has been added in Section 8.7.2 of the FSR.	Stantec
4. The following revisions are requested in the next submission: a) Please include groundwater level on the infiltration gallery detail drawing. b) The existing plan schematic on page 59/219 of the SWM report should have catchment 104 draining to catchment 100 first before draining to the SWM facility, as per the existing condition SWMHYMO parameters.	a) No infiltration galleries are proposed for the site. b) The existing plan schematic will be updated to reflect the existing condition drainage patterns.	Stantec
As the SWM facility is discharging to municipal infrastructure, we defer all other SWM comments to the City.	Noted.	Stantec
Advisory Comment to the Region and City	Response	
In addition to Stage 2 - Block 1, Stage 3 – Blocks 1 and 13 are shown as being within the surveyed woodland dripline and/or its 10 metre setback.	An Open Space Block has been added to include the feature and recommended buffer. Please refer to the revised Draft Plan.	MHBC
In accordance with the GRCA's 2024 Plan Review Fee Schedule, this subdivision requires a base fee of \$2,505 and a per hectare fee of \$1,305, for a total fee of \$22,258.79. We will invoice the client for \$15,581.15, which covers 70% of the fee. The remaining 30% (\$6,677.64) is required prior to issuance of conditions of draft plan approval. The net hectare fees may be adjusted if blocks are revised for natural hazards, natural heritage areas and buffers. Additional fees will be required for final clearance, and a separate fee will be required for a GRCA permit	Acknowledged	
Waterloo Region District School Board		
Student Accommodation	Response	
At this time, the subject lands are within the boundaries of the following WRDSB schools: - Lincon Heights Public School (Junior Kindergarten to Grade 8) - Bluevale CI (Grade 9-Grad 12)	Noted	MHBC

The WRDSB's 2020-2030 Long-Term Accommodation Plan projects steady utilization at these facilities. Interim student accommodation measures, including portable classrooms, may be required in the future. Alternatively, the WRDSB may conduct a boundary study or designate this property as a "Development Area" and assign it to Holding Schools before occupancy or sales	Noted	MHBC
Student Transportation	Response	
The WRDSB supports active transportation, and we ask that pedestrians be considered in the review of all development applications to ensure the enhancement of safety and connectivity. WRDSB staff are interested in engaging in a conversation with the City/Region and applicant to review the optimization of pedestrian access to public transit, and municipal sidewalks so students may access school bus pick-up points. Student Transportation Services of Waterloo Region (STSWR)'s school buses will not travel privately owned or maintained rights-of-way to pick-up/drop-off students. Transported students will be required to meet the bus at a congregated bus pick-up point. STSWR may have additional comments about student pick-up point(s) placement on municipal rights-of-way.	Pedestrian infrastructure is included in all roads, which are proposed as public roads. All three streets connect with Millennium Blvd, which has existing pedestrian infrastructure leading out to University Avenue. There are no private roads that would require bus travel.	MHBC
WRDSB Draft Conditions	Response	
Concerning any future declaration or agreement, the WRDSB requests the following inclusions in the conditions of Draft Approval:		
1. That the Owner/Developer must agree in the Subdivision Agreement and/or Site Plan Agreement to notify all purchasers of residential units and/or renters of same, by inserting the following clauses in all offers of Purchase and Sale/Lease: a. "Despite the best efforts of the Waterloo Region District School Board (WRDSB), accommodation in nearby facilities may not be available for all anticipated students. You are hereby notified that students may be accommodated in temporary facilities and/or bussed to a school outside the area, and further, that students may, in future, be transferred to another school." b. For information on which schools are currently serving this area, contact the WRDSB Planning Department at 519-570-0003 ext. 4419, or email planning@wrdsb.ca. Information provided	Acknowledged	MHBC

by any other source cannot be guaranteed to reflect current school assignment information. c. "To limit liability, public school buses operated by the Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up students, and potential busing students will be required to meet the bus at a congregated bus pick-up point."		
2. That the Owner/Developer supply, erect and maintain a sign (at the Owner/Developer's expense and according to the WRDSB's specifications), near or affixed to the development sign, advising prospective residents about schools in the area and that prior to final approval, the Owner/Developer shall submit a photo of the sign for review and approval of the WRDSB.	Acknowledged	MHBC
3. Prior to final approval, the WRDSB advises in writing to the Approval Authority how the above condition(s) has/have been satisfied.	Acknowledged	MHBC
Please be advised that any development on the subject lands is subject to the provisions of the WRDSB's Education Development Charges By-law, 2021 or any successor thereof and may require the payment of Education Development Charges for these developments prior to issuance of a building permit. The WRDSB requests to be circulated on any subsequent submissions on the subject lands and reserves the right to comment further on this application. The Region will require the Owner/Developer to satisfy the above requirements as a condition of draft plan approval. Additionally, a development agreement with the Region and/or Subdivision Agreement with the City of Waterloo will be required to secure the above noted requirements/advisory clauses.	Acknowledged	MHBC
Waterloo Catholic District School Board		
	Response	
The Waterloo Catholic District School Board has reviewed the subject application and based on our development circulation criteria have the following comment(s)/condition(s):	Acknowledged	MHBC

A. That any Education Development Charges shall be collected prior to the issuance of a building permit(s). B. That the developer and the Waterloo Catholic District School Board reach an agreement regarding the supply and erection of a sign (at the developer's expense and according to the Board's specifications) affixed to the development sign advising prospective residents about schools in the area. A sign specifications document can be found at the bottom of the board's planning department web page (https://www.wcdsb.ca/about-us/cs/planning/). C. That the developer shall include the following wording in the subdivision agreement to advise all purchasers of residential units and/or renters of same: "In order to limit risks, public school buses contracted by Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up and drop off students, and so bussed students will be required to meet the bus at a congregated bus pick-up point."		
The Region will require the Owner/Developer to satisfy the above requirements as a condition of draft plan approval. Additionally, a development agreement with the Region and/or Subdivision Agreement with the City of Waterloo will be required to secure the above noted requirements/advisory clauses.	Acknowledged	MHBC
Region of Waterloo		
Delegated Authority Comments		
Telecom (Telus)	Response	
Telecom (Telus) noted there is no underground infrastructure in the area in their letter dated January 31, 2024 (Attachment 1).	Acknowledged	MHBC
Enova Power Corp.	Response	
In a letter dated February 5, 2024, attached to these comments as Attachment 2, Enova Power Corp. ("Enova") provided the following comments:	Acknowledged	MHBC
1. Conditions of Services: Enova standard conditions in effect at the time of servicing will apply.	Acknowledged	MHBC
2. Existing System: Enova has 2- existing 3-phase primary overhead distribution lines running along Millennium Blvd that Enova intends to maintain. To accommodate the proposed new	Acknowledged	MHBC

subdivision at 400 Millennium Blvd, the infrastructure installed will be Enova owned 3-phase underground distribution lines as well as underground transformation equipment.		
3. Relocation of Existing Facilities: Any relocation of existing Enova facilities, if possible, will be at 100% of the applicant's cost.	Acknowledged, provided the relocation is as a result of the development.	MHBC
4. Expansion and Upgrade: If modifications or additions to Enova existing distribution system triggered by a subdivision development are necessary otherwise customer connections cannot be made, Enova will conduct an economic evaluation outlined in OEB Distribution System Code. Such expansion cost will be stated in a Subdivision Agreement between Enova and the Customer and shall be signed by both parties prior to construction.	Acknowledged	MHBC
5. Set Back: The proposed building(s) must be set back a minimum of 5.0m from all overhead primary conductors. Decreased setbacks (if proposed) may necessitate the installation of non-combustible barrier walls between Enova padmount transformers and the housing unit as per the Ontario Electrical Safety Code, Section 26-014. This installation would be at 100% the developer's cost and may require a revised right of way cross section to facilitate the installation due to the proximity of the padmount transformer to the sidewalk.	Acknowledged	MHBC
6. Clearance: Any objects (crane, similar hoisting device, backhoe, power shovel or other vehicle or equipment) shall not be brought closer than 3 meters to an energized overhead conductor owned by Enova.	Acknowledged	MHBC
7. Access to Meters: Enova requires a minimum 1.2 m (4') wide clear access in front of and around a meter location that is within 3 m (10') of the front corner of the building and is on the side of the lot where the service stub is located. If less than 1.2m (4') is provided, a registered easement on the adjacent lot must be granted at no cost to WNH. If this access/easement cannot be provided, the meter must be placed on the front face of the house. For on-street townhouse blocks, ganged meter bases must be placed on the end units in accordance with Enova's final design.	Acknowledged	MHBC
8. Easement: In a townhouse blocks subdivision if there is no public right-of-way, a blanket easement over all townhouse blocks is required by Enova in order to construct and maintain hydro owned facilities. Whereas there is public right-of-way in a townhouse block subdivision,	Acknowledged	MHBC

individual easement to ganged meter base is required. Easement shall be at no cost to Enova and be free of encumbrances, including fences and shall be granted to Enova prior to connection.		
9. Road Widening: The Regional Municipality of Waterloo should review the pole locations in relation to any planned road widening. A larger building set back may be required to facilitate the relocation of Enova's poles.	There are no Regional roads and no widenings are required.	MHBC
10. Grading: Any grading changes by the developer which will affect existing Enova facilities shall be reviewed and approved by Enova prior to starting any site grading.	Noted	MHBC
11. Landscaping: The customer is to ensure any landscaping that will be within the vicinity of Enova infrastructure complies with the ESA Planting Under or Around Powerlines & Electrical Equipment guideline.	Noted	MHBC
12. What Happens Next: Enova may conduct a high level hydro plan once receiving the 1st submission package. Enova will only start the detail engineering design upon the reception of the 2nd submission package. Typical 14 weeks is required from the date of Enova receiving the 2nd submission package to the date of Enova issuing the subdivision agreement to Customer. Customer shall install road crossings as per Enova design and then install road base and curbs prior to start of hydro civil construction.	Acknowledged – detailed design will follow draft plan approval.	MHBC
Enbridge	Response	
Enbridge Gas does not object to the proposed application(s) however, we reserve the right to amend or remove development conditions.	Acknowledged	MHBC
As a condition of draft plan approval , the Owner/Developer will need to provide Enbridge Gas with the necessary easements and/or agreements for the provision of gas services to these plans.	Acknowledged	MHBC
Bell Canada	Response	
Bell Canada has reviewed the circulation regarding the above noted application. The following paragraphs are to be included as a condition of approval: 1. The Owner acknowledges and agrees to convey any easement(s) as deemed necessary by Bell Canada to service this new development. The Owner further	Acknowledged	MHBC

agrees and acknowledges to convey such easements at no cost to Bell Canada. 2. The Owner agrees that should any conflict arise with existing Bell Canada facilities where a current and valid easement exists within the subject area, the Owner shall be responsible for the relocation of any such facilities or easements at their own cost.		
Upon receipt of this comment letter, the Owner is to provide Bell Canada with servicing plans/CUP at their earliest convenience to planninganddevelopment@bell.ca to confirm the provision of communication/telecommunication infrastructure needed to service the development.	Acknowledged – servicing plans will be sent to Bell Canada during detailed design.	MHBC
It shall be noted that it is the responsibility of the Owner to provide entrance/service duct(s) from Bell Canada's existing network infrastructure to service this development. In the event that no such network infrastructure exists, in accordance with the Bell Canada Act, the Owner may be required to pay for the extension of such network infrastructure.		
If the Owner elects not to pay for the above noted connection, Bell Canada may decide not to provide service to this development.	Acknowledged	MHBC
As a condition of draft plan approval, the Owner/Developer will be required to make arrangements with a telecommunications provider for the provision of any necessary telephone services/infrastructure.	Acknowledged	MHBC
HydroOne	Response	
HydroOne Networks Inc. has reviewed the draft plan of subdivision and has indicated that they have no comments or concerns.	Acknowledged	MHBC
Canada Post	Response	
In a letter dated February 1, 2024, Canada Post determined that the completed project will be serviced by centralized mail delivery provided through Canada Post Community Mailboxes.	Acknowledged	MHBC
Canada Post's centralized delivery policy will apply for any buildings of 3 or more self-contained units with a common indoor area. For these units the owner/developer will be required to install a mail panel and provide access to Canada Post. In order to provide mail service to this development, Canada Post requests that the owner/developer comply with the following conditions: The owner/developer will consult with Canada Post to determine suitable permanent locations for the placement of Community Mailboxes and to indicate	Acknowledged; however, the temporary Community Mailbox location and permanent concrete pads at each of the Community Mailbox locations will be constructed at the cost of Canada Post.	MHBC

these locations on appropriate servicing plans. • The Builder/Owner/Developer will confirm to Canada Post that the final secured permanent locations for the Community Mailboxes will not be in conflict with any other utility; including hydro transformers, bell pedestals, cable pedestals, flush to grade communication vaults, landscaping enhancements (tree planting) and bus pads. • The owner/developer will install concrete pads at each of the Community Mailbox locations as well as any required walkways across the boulevard and any required curb depressions for wheelchair access as per Canada Post's concrete pad specification drawings. • The owner/developer will agree to prepare and maintain an area of compacted gravel to Canada Post's specifications to serve as a temporary Community Mailbox location. This location will be in a safe area away from construction activity in order that Community Mailboxes may be installed to service addresses that have occupied prior to the pouring of the permanent mailbox pads. This area will be required to be prepared a minimum of 30 days prior to the date of first occupancy. • The owner/developer will communicate to Canada Post the excavation date for the first foundation (or first phase) as well as the expected date of first occupancy. • The owner/developer agrees, prior to offering any of the residential units for sale, to place a "Display Map" on the wall of the sales office in a place readily available to the public which indicates the location of all Canada Post Community Mailbox site locations, as approved by Canada Post and the Region of Waterloo. • The owner/developer agrees to include in all offers of purchase and sale a statement, which advises the prospective new home purchaser that mail delivery will be from a designated Community Mailbox, and to include the exact locations (list of lot #s) of each of these Community Mailbox locations; and further, advise any affected homeowners of any established easements granted to Canada Post.		
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The owner/developer will be responsible for officially notifying the purchasers of the exact Community Mailbox locations prior to the closing of any home sales with specific clauses in the Purchase offer, on which the homeowners do a sign off.		
Canada Post further requests the owner/developer be notified of the following:	Response	
1. The owner/developer of any condominiums will be required to provide signature for a License to Occupy Land agreement and provide winter snow clearance at the Community Mailbox locations.	Acknowledged	MHBC
2. Enhanced Community Mailbox Sites with roof structures will require additional documentation as per Canada Post Policy	No enhanced Community Mailbox Sites are proposed.	MHBC
3. There will be no more than one mail delivery point to each unique address assigned by the Municipality.	Acknowledged	MHBC
4. Any existing postal coding may not apply, the owner/developer should contact Canada Post to verify postal codes for the project.	Acknowledged	MHBC
5. The complete guide to Canada Post's Delivery Standards can be found at: https://www.canadapost.ca/cpo/mc/assets/pdf/business/standardsmanual_en	Acknowledged	MHBC
Township of Woolwich		
Township Planning staff request clarification regarding the following:	Response	
The Township requests confirmation if any reconstruction works are proposed along Country Squire Road? If works are proposed, accommodation should be made for the existing trails.	No connections or impacts to the Country Squire Road right-of-way are anticipated.	Stantec
The hydrogeological study does not appear to consider any adjacent wells and ensure that development that will not impact the same. Wells should be identified, and monitoring should take place prior to and during the development to ensure there are no impacts as a result of the development.	A preliminary review of the MECP Water Well Information System (i.e., water well records) indicates that residential properties located to the north of Country Squire Road are likely serviced by private wells. However, groundwater flow direction is confirmed to move from the northwest to southeast below the Site from the areas where private wells may be present. As such, future development activities occurring on the Site are not likely to affect / interfere with the usage (i.e., groundwater quantities) of these private wells.	Stantec

	If further investigation / monitoring of private wells is required, this work would be completed during detailed design.	
For the adjacent lands at 515 Country Squire Rd, how will these lands develop in the future? Should a future road access to the lands from the subject development be provided?	The lands at 515 Country Squire Road are outside of the development area and are under separate ownership. The project team is not aware of any plans for the development of this site and a new site access was not requested by City staff.	MHBC
Is a walkway being proposed along the south side of Country Squire to connect to the existing sidewalk?	No walkway is proposed – it does not lead to any destination and is a duplication of the pedestrian infrastructure proposed within the subdivision.	MHBC
The applicant is advised of the following	Response	
Avon Trail follows Country Squire road from the west to Glasgow Street, then north into Conestogo; and	Acknowledged	MHBC
the Walter Bean Trail follows Country Squire Road from the east to Glasgow Street, then north into Conestogo, use Country Squire Road. The on road trails do not appear to be impacted by the development.	Acknowledged	MHBC
Township staff request the following as conditions of draft approval:	Response	
Warning clauses should be registered on title for future landowners to be made aware that the lands are in proximity to farms, and that normal farming activities (noise, odours etc.) are to be anticipated, which may impact the use of their property. Suggested wording: "Purchasers/tenants are advised that the property is located within close proximity to agricultural operations and that normal operations may at times produce noise, odours, etc. which may impact use of this property at times."	Acknowledged – suggested wording to be incorporated as warning clauses registered on title.	MHBC
The rear of the lots along Country Squire Road will require fencing to delineate the property line.	This can be addressed through an appropriately worded condition of approval, with flexibility regarding the type of fencing.	MHBC
The reserve block, Block 337, should be acquired by the City and maintained to prevent access from the rear of the lots to Country Squire Road.	The reserve Block is not part of this Draft Plan.	MHBC
The Region will require the Owner/Developer satisfy all the Township's requirements through the resubmission of a revised plan of subdivision and/or supporting documents to address the Township's requests for additional information/clarification.	Acknowledged	MHBC

As a condition of draft approval , the owner will be required to enter into a development agreement with the Region and/or Subdivision Agreement with the City of Waterloo to secure the above noted requirements/advisory clauses.	Acknowledged	MHBC
Regional Comments	Response	
The following planning matters were evaluated by Regional staff based on Provincial and Regional policies, and detailed comments with respect to each matter and/or study that was submitted in support of the proposed applications are provided below.	Acknowledged	MHBC
Community Planning	Response	
Region staff have reviewed the report entitled "Planning Justification Report: Official Plan Amendment, Zoning By-law Amendment & Plan of Subdivision, 400 Millennium Boulevard, City of Waterloo", dated December 2023 and authored by MHBC Planning	Acknowledged	MHBC
Consistency with Provincial Legislation		
Provincial Policy Statement	Response	
The Provincial Policy Statement, 2020 (PPS) promotes building strong, healthy communities by encouraging the development of liveable and resilient neighbourhoods that protect the environment, public health and safety of Ontarians. Settlement areas are intended to accommodate the majority of growth within the province and provide a range of development opportunities to efficiently use under utilized sites. The proposed application is consistent with the PPS.	Acknowledged	MHBC
A Place to Grow: Growth Plan for the Greater Golden Horseshoe	Response	
The Growth Plan for the Greater Golden Horseshoe (Growth Plan) prescribes minimum density targets for each municipality to achieve regarding residents and jobs per hectare. The proposed amendment will result in a greater residential density within the subdivision by allowing townhouse development in addition to single detached dwellings, which will contribute to the achievement of Growth Plan density target of 50 residents and jobs combined per hectare. The proposed application conforms to the Growth Plan for the Greater Golden Horseshoe.	Acknowledged	MHBC
Regional Official Plan	Response	
As noted above, the subject lands are within the 'Designated Greenfield Area' as illustrated on Map 2 in the ROP. Designated Greenfield areas within the City of Waterloo are required to meet or exceed	Acknowledged	MHBC

a minimum density of 54 residents and jobs per hectare. The Planning Justification Report entitled, "Planning Justification Report: Official Plan Amendment, Zoning By-law Amendment & Plan of Subdivision, 400 Millennium Boulevard, City of Waterloo" prepared by MHBC Planning and dated December 2023 notes that the proposed amendment will help achieve the minimum requirement of 59 residents and jobs per hectare with a proposed minimum density of 106 people and jobs per hectare and maximum density of 117 people and jobs per hectare. The proposed official plan amendment and zoning by-law amendment would permit 579-630 dwelling units, where 61-77 dwelling units would be single/semidetached dwellings, 60-83 units would be street townhouses and the remaining 458-470 units would be stacked townhouses. Regional staff calculated the proposed density to be a minimum of 82.30 people and jobs per hectare and maximum density of 91.02 people and jobs per hectare (not including commercial floor area) which exceeds to minimum density targets set out in Table 4 of ROP Section 2.G.		
Additionally, a minimum target of 30 percent of new ownership and rental housing is to be affordable and accommodate a variety of housing options to address the needs of range of income and household incomes, sizes and ages. All developments proposing residential uses utilizing 1 hectare or more of developable land are required to accommodate a minimum of 30% of the new residential units in forms other than single detached dwelling, semi-detached dwelling and single unit townhouse units. The Region will promote the inclusion of additional built forms including duplexes, triplexes, fourplexes, multiple dwellings and apartments. The proposed development includes several blocks of stacked townhouses for a total of approx. 458-470 units, equivalent to approximately 72% of the overall units.	Acknowledged	MHBC
ROP policy 2.G.1.2 provides key objectives that includes an approach to accommodate the forecasted growth within 15-minute neighbourhoods, which are compact, well-connected places where the everyday needs of residents for goods, services and employment can be met. A well-designed 15-minute neighbourhood will contain a mix of land uses that provide for a variety of incomes and household sizes. The development densities will support a range of services and high quality public spaces.	Acknowledged	MHBC

Developments are to be planned to prioritize walking, cycling and rolling in addition to establishing a street network with frequent connections and pathways to surrounding areas.		
15-minute neighbourhood is defined in the ROP as: <i>"Compact, well-connected places such as mixed-use neighbourhoods or other areas within the Urban Area and Township Urban Areas. They are places that offer support and opportunities for people of all ages and abilities and at all times of year to conveniently access the necessities for daily living with a 15-minute trip by walking, cycling, and rolling, and where other needs can be met by taking direct, frequent, and convenient transit, wherever possible. 15-minute neighbourhoods include an appropriate mix of jobs, local stores, and services, a full range of housing, transportation options and public service facilities. They are also age-friendly places and may take different shapes and forms appropriate to their contexts."</i>	Acknowledged	MHBC
The amendment proposes to include a park block and 2 walkway blocks for ease of access to the parks and open spaces. The amendment has oriented the higher density stacked townhouse/multi-unit residential and commercial blocks to be along Millennium Blvd to support higher densities along the corridor while single detached blocks are oriented towards the outer streets. This configuration could contribute to transit supportive development if transit services were to be extended to the area in the future and Millennium Blvd provides access to transit routes and cycling infrastructure that run along University Ave E.	Acknowledged	MHBC
The proposed development is well served by a range of land uses, active transportation and transit, and will contribute to the available housing stock in the existing neighbourhood.	Acknowledged	MHBC
Record of Site Condition (RSC)	Response	
An RSC is not required for the subject property according to the Region of Waterloo's Implementation Guideline for the Review of Development Applications on or Adjacent to Known and Potentially Contaminated Sites	Acknowledged	MHBC
Hydrogeology and Water Programs (HWP)	Response	
Hydrogeology and Water Programs (HWP) staff reviewed the development proposal for 400 Millennium Blvd, Waterloo.	Acknowledged	MHBC
Regional Staff require the developer enter into an agreement to complete a Salt Management Plan to the satisfaction of the Region at Site Plan Control.	Acknowledged, a Salt Management Plan will be prepared as part of the future site plan application.	MHBC

A Salt Management Plan will be required for any area containing eight (8) or more parking spaces and/or a paved area equivalent in size and scale (i.e. private roads) requiring winter maintenance. As part of the plan, HWP would encourage the proponent to incorporate design considerations with respect to salt management, including: • Ensure that cold weather stormwater flows are considered in the site design. Consideration should be given to minimize the transport of meltwater across the parking lots or driveway. This also has the potential to decrease the formation of ice and thereby the need for de-icing. • Directing downspouts towards pervious (i.e. grassy) surfaces to prevent runoff from freezing on parking lots and walkways. • Locating snow storage areas on impervious (i.e. paved) surfaces in close proximity to catch basins. • Using winter maintenance contractors that are Smart About Salt™ certified. • Using alternative de-icers (e.g. pickled sand) in favour of road salt.		
The proponent is eligible for certification under the Smart About Salt™ program for this property. Completion of the Salt Management Plan is one part of the program. To learn more about the program and to find accredited contractors please refer to: http://www.smartaboutsalt.com/. Benefits of designation under the program include cost savings through more efficient use of salt, safe winter conditions by preventing the formation of ice, and potential reductions in insurance premiums.	Acknowledged	MHBC
As a condition of draft approval for the related draft plan of subdivision application, Regional staff will require that the developer enter into an agreement to complete Salt Management Plan (SMP) for the multiple residential and commercial blocks, to the satisfaction of the Region, as part of a future Site Plan application.	Acknowledged, a Salt Management Plan will be prepared as part of the future site plan application.	MHBC
Notice of Source Protection Plan Compliance (Section 59 Notice)	Response	
Region staff have reviewed the proposed development, the subject property is not in a source protection area under the 2022 Grand River Source Protection Plan. A Notice of Source Protection Plan Compliance (Section 59 Notice) is not required.	Acknowledged	MHBC

Environmental Impact Study	Response	
The Region obtained a third-party to conduct a peer review of the Environmental Impact Study (EIS) titled Environmental Impact Study Update prepared by Stantec dated November 3, 2023 which was submitted in support of the Official Plan Amendment, Zoning Bylaw Amendment and Draft Plan of Subdivision applications. The peer review comments identified revisions and/or clarifications required to the Environmental Impact Study before the study can be accepted by the Region. A revised EIS, to the satisfaction of the Region will be required prior to City of Waterloo Council considering the Official Plan Amendment and Zoning Bylaw Amendment application and prior to draft plan approval being issued.	Acknowledged; responses provided under the LGL Peer Review section of the matrix	Stantec
Noise Study	Response	
The Region obtained a third-party to conduct a peer review of the noise study submitted titled Proposed Millennium Lands – Block 320, Plan 58M-506 331 – City of Waterloo, ON - Noise Impact Study, dated November 9, 2023. The peer review identified several revisions and/or clarifications required to the noise study before the noise study can be accepted by the Region. A copy of the peer review comments have been attached to this letter. A revised Noise Study, to the satisfaction of the Region will be required prior to City of Waterloo Council considering the Official Plan Amendment and Zoning Bylaw Amendment application.	Through discussions with the Region of Waterloo (see attached correspondence, dated October 3, 2024), Stantec has provided written responses to the Peer Review comments. It is recommended that any updates to the Noise Study be completed as a condition of Draft Plan Approval.	Stantec
Housing Services	Response	
The following Regional policies and initiatives support the development and maintenance of affordable housing: • Regional Strategic Plan ◦ Strategic Priority 1 is “Homes for All” in the 2023-2027 Strategic Plan. • 10-Year Housing and Homelessness Plan ◦ contains an affordable housing target which is that 30% of all new residential development between 2019 and 2041 in Waterloo Region is to be affordable to low and moderate income households. • Building Better Futures Framework ◦ shows how the Region plans to create 2,500 units of housing affordable to people with low to moderate incomes by 2025. • Region of Waterloo Official Plan	Acknowledged	MHBC

○ Section 3.A (Range and Mix of Housing) contains land use policies that ensure the provision of a full and diverse range and mix of permanent housing that is safe, affordable, of adequate size, and meets the accessibility requirements of all residents.		
The Region supports the provision of a full range of housing options, including affordable housing. Should these amendments and plan of subdivision be approved, staff recommend that the applicant consider providing a number of affordable housing units on the site, as defined in the Regional Official Plan. Rent levels and house prices that are considered affordable according to the Regional Official Plan are provided below in the section on affordability.	A range of unit types have been proposed for the subject lands, which will include a range of unit costs.	MHBC
In order for affordable housing to fulfill its purpose of being affordable to those who require rents or purchase prices lower than the regular market provides, a mechanism should be in place to ensure the units remain affordable and establish income levels of the households who can rent or own the homes.	A range of unit types have been proposed for the subject lands, which will include a range of unit costs.	MHBC
Staff further recommend meeting with Housing Services to discuss the proposal in more detail and to explore opportunities for partnerships or programs and mechanisms to support a defined level of affordability.	A range of unit types have been proposed for the subject lands, which will include a range of unit costs.	MHBC
Policy 3.A.6 in the Regional Official Plan Amendment 6 applies to this site. It states: "Where a development application proposing residential uses is submitted for a site containing one hectare or more of developable land, the Region and the area municipalities will require, a minimum of 30 percent of new residential units to be planned in forms other than single-detached, semi-detached, and street fronting and single unit condominium townhouse units. Examples of other potential housing forms may include, but are not limited to: duplexes; tri-plexes; four-plexes; multi-plexes; stacked and back-to-back townhouses; and apartments."	Acknowledged	MHBC
A review of the proposed unit types shown in Table 1 in the Planning Justification Report indicates that this proposal adheres to Policy 3.A.6.	Acknowledged	MHBC

Affordability		Response	
For the purposes of evaluating the affordability of an ownership unit, based on the definition in the Regional Official Plan, the purchase price is compared to the least expensive of:		A range of unit types have been proposed for the subject lands, which will include a range of unit costs.	MHBC
Housing for which the purchase price results in annual accommodation costs which do not exceed 30 percent of gross annual household income for low and moderate income households	\$418,100		
Housing for which the purchase price is at least 10 percent below the average purchase price of a resale unit in the regional market area	\$679,300		
In order for an owned unit to be deemed affordable, the maximum affordable house price is \$418,100.		A range of unit types have been proposed for the subject lands, which will include a range of unit costs.	MHBC
For the purposes of evaluating the affordability of a rental unit, based on the definition of affordable housing in the Regional Official Plan, the average rent is compared to the least expensive of:		A range of unit types have been proposed for the subject lands, which will include a range of unit costs.	MHBC
A unit for which the rent does not exceed 30 per cent of the gross annual household income for low and moderate income renter households	\$1,960		
A unit for which the rent is at or below the average market rent (AMR) in the regional market area	Bachelor: \$1,075 1-Bedroom: \$1,245 2-Bedroom: \$1,469 3-Bedroom: \$1,631 4+ Bedroom: n/a		
In order for a rental unit to be deemed affordable, the average rent for the proposed units must be at or below the average market rent in the regional market area as shown above.		A range of unit types have been proposed for the subject lands, which will include a range of unit costs.	MHBC
Water Services		Response	
Engineering and Planning staff have reviewed the above noted application(s)		Acknowledged	MHBC
We have reviewed the Functional Servicing and Stormwater Management Report dated November 2023 and have no comments.		Acknowledged	MHBC
Corridor Management			
Environmental Noise		Response	
Corridor Planning staff have reviewed the report entitled Proposed Millennium Lands – Block 320, Plan 58M-506 331 – City of Waterloo, ON – Noise Impact Study, dated November 9, 2023, prepared by Stantec and provide the following comments regarding transportation noise.		Acknowledged	Stantec
The report indicates that there will be transportation noise impacts from Millennium Boulevard.		Acknowledged	Stantec
The report indicates that where the acoustical impacts are above acceptable levels mitigation such as the provision for central air conditioning and a noise warning clause are required to ensure		Noted	Stantec

indoor noise levels do not exceed acceptable levels noted in NPC-300. The location, installation and sound ratings of future air conditioning devices should comply with NPC-300.		
The report notes that the noise levels in the Outdoor Living Area (OLA) will not exceed the limit and no mitigation or a noise warning clauses will not be required. The report notes that all dwelling units Block A and B will require the provision to install central air conditioning and a Type C noise warning clause. Construction meeting the Ontario Building Code (OBC) will provide sufficient sound insulation for all dwelling units	Acknowledged	Stantec
Since the noise source, Millennium Boulevard, is a roadway under the jurisdiction of the City of Waterloo, staff as a condition of draft approval, the owner/developer will be required to enter into an agreement with the City of Waterloo to implement the recommendations of the noise study	Noted	Stantec
The report recommends the following noise warning clause be registered on title for all dwelling units in Blocks A and B. As a condition of draft approval , the owner will be required to enter into an agreement with the City of Waterloo and that the following clause be included in agreements of Offers of Purchase and Sale, lease/rental agreements and condominium declarations.	Noted	Stantec
All Dwelling Units in Blocks A and B	Response	
Type C: This dwelling unit has been designed with the provision for adding central air conditioning at the occupant's discretion. Installation of central air conditioning by the occupant in low and medium density developments will allow windows and exterior doors to remain closed, thereby ensuring that the indoor sound levels are within the sound level limits of the Municipality and the Ministry of the Environment, Conservation and Parks.	Acknowledged	Stantec
Prior to the issuance of any building permits, the City of Waterloo's Building Inspector will certify that the noise attenuation measures are incorporated in the building plans and upon completion of construction, the City of Waterloo's Building Inspector will certify that the dwelling units have been constructed accordingly.	Noted	Stantec
Regional Fees	Response	
Regional staff confirm receiving and depositing the Official Plan Amendment & Zoning By-law Amendment Regional Review Fee as well as the applicable Draft Plan of Subdivision application fees.	Acknowledged	

Any future development on the lands subject to the above-noted application will be subject to the provisions of Regional Development Charges By-law 19-037 or any successor thereof.	Acknowledged	
General Comments and Next Steps	Response	
The Owner/Developer should be advised that receipt of these post circulation comments does not constitute a draft or final approval of this application.	Acknowledged	MHBC
Prior to draft approval of the subdivision by the Region, the Owner/Developer must address the above noted agency and Regional comments, as well as the City of Waterloo comments. Prior to City of Waterloo Council considering the Official Plan Amendment and Zoning By-law Amendment applications the Region requires resubmission of the Environmental Impact Study and Noise Study with revisions to address the above comments. Further, the City of Waterloo must provide a recommendation in support of draft plan approval, including the City's conditions of draft approval.	Acknowledged	MHBC
Further, prior to draft approval, the Owner/Developer must submit to the Region 5 copies the plan to be draft approved. The plan must be signed by the Owner and Surveyor. Once each plan of subdivision is draft approved, the draft approval will take effect 21 days after the day the notice of decision is issued, provided no appeals are received in accordance with Section 51(39) of the Planning Act.	Acknowledged	MHBC
Telus		
Comments	Response	
Telus has no infrastructure between Pavement Centerline & RWO line on the same side as the proposal. Permit expires six (6) months from approval date. If the location of your proposal design changes, it will be a necessary to re-apply.	Acknowledged	MHBC
Remarks	Response	
You are required to contact Telus for route locates prior to digging/construction. You must hand trench to expose Telus infrastructure at all locations, pressurized water technology (Hydro-Vacuuming) is not permitted as alternate form of hand trenching.	Acknowledged	MHBC
Enova		
Comments	Response	
1. Conditions of Services: Enova standard conditions in effect at the time of servicing will apply	Acknowledged	MHBC

2. Existing System: Enova has 2-existing 3-phase primary overhead distribution lines running along Millennium Blvd that Enova intends to maintain. To accommodate the proposed new subdivision at 400 Millennium Blvd., the infrastructure installed will be Enova owned 3-phase underground distribution lines as well as underground transformation equipment.	Acknowledged	MHBC
3. Relocation of Existing Facilities: Any relocation of existing Enova facilities, if possible, will be at 100% of the applicant's cost	Acknowledged	MHBC
4. Expansion and Upgrade: If modifications or additions to Enova existing distribution system triggered by a subdivision development are necessary otherwise customer connections cannot be made. Enova will conduct an economic evaluation outlined in OEB Distribution System code. Such expansion cost will be stated in a Subdivision Agreement between Enova and the Customer and shall be signed by both parties prior to construction.	Acknowledged	MHBC
5. Set Back: The proposed building(s) must be set back a minimum of 5.0m from all overhead primary conductors. Decreased setbacks (if proposed) may necessitate the installation of non-combustible barrier walls between Enova padmount transformers and the housing unit as per the Ontario Electrical Safety Code, Section 26-2014. This installation would be at 100% the developer's cost and may require a revised right of way cross section to facilitate the installation due to the proximity of the padmount transformer to the sidewalk.	Acknowledged	MHBC
6. Clearance: Any objects (crane, similar hoisting device, backhoe, power shovel or other vehicle or equipment) shall not be brought closer than 3 meters to an energized overhead conductor owned by Enova.	Acknowledged	MHBC
7. Access to Meters: Enova requires a minimum 1.2 m(4') wide clear access in front of and around a meter location that is within 3 m (10') of the front corner of the building and is on the side of the lot where the service stub is located. If less than 1.2m (4') is provided, a registered easement on the adjacent lot must be granted at no cost to WNH. If this access/easement cannot be provided, the meter must be placed on the front case of the house. For on-street townhouse blocks, ganged meter bases must be placed on the end units in accordance with Enova's final design.	Acknowledged	MHBC

8. Easement: In a townhouse blocks subdivision if there is no public right-of-way, a blanket easement over all townhouse blocks is required by Enova in order to construct and maintain hydro owned facilities. Where as the is public right-of-way in a townhouse block subdivision, individual easement to ganged meter base is required. Easements shall be at no cost to Enova and be free of encumbrances, including fences and shall be granted to Enova prior to connection.	Acknowledged	MHBC
9. Road Widening: The Regional Municipality of Waterloo should review the pole locations in relation to any planned road widening. A larger building set back may be required to facilitate the relocation of Enova's poles.	Acknowledged	MHBC
10. Grading: Any grading changes by the developer which will affect existing Enova facilities shall be reviewed and approved by Enova prior to starting any site grading.	Acknowledged	MHBC
11. Landscaping: The customer is to ensure any landscaping that will be within the vicinity of Enova infrastructure complies with the <i>ESA Planting Under or Around Powerlines & Electrical Equipment</i> guidelines.	Acknowledged	MHBC
12. What Happens Next: Enova may conduct a high level hydro plan once receiving the 1 st submission package. Enova will only start the detailed engineering design upon the reception of the 2nd submission package. Typical 14 weeks is required from the date of Enova receiving the 2 nd submission package to the date Enova issuing the subdivision agreement to the Customer. Customer shall install road crossings as per Enova design and then install road base and curbs prior to start of hydro civil construction.	Acknowledged	MHBC
Hydro One Letter		
Comments	Response	
No comments or concerns at this time. Our preliminary review considers issues affecting Hydro One's High Voltage Facilities and Corridor Land's only.	Acknowledged	MHBC
Natural Heritage Peer Review	All Responses Prepared by Stantec	
LGL Comments		
1. Terms of Reference and Approach to Review	Response	
The terms of reference was reviewed by the County and City of Waterloo and GRCA. The report contains the materials noted in the TOR	Acknowledged, thank you. No report updates required.	

2. Approach and Methods	Response	
The approach and methods are well described and include approaches to confirming the data from the 2008 study.	Acknowledged, thank you. No report updates required.	
The methods are generally consistent with those described in the Greenlands Network Implementation guideline. The report would, however, benefit from additional language on:	Acknowledged.	
Existing and potential to enhance connectivity between the core natural feature to the west and other features within the Natural Heritage System, and	Acknowledged however, additional opportunities for connectivity in this regard is outside of the scope of this Study (outside of the proposed development Area and EIS Study Area). The Town and Region's EEAC committee are likely to support this initiative.	
An analysis and justification for the recommended buffer size to ensure the protection and enhancement of the ecological functions of the woodland and wetland to the West.	Acknowledged; additional discussion has been provided in the updated EIS.	
3. Feature Identification, Species Lists and Status Ranks	Response	
The technical review and assessments completed appear accurate and complete.	Acknowledged, thank you. No report updates required.	
The report identified Regionally Significant Woodland and Locally Significant Wetland to the west of the property (on "other lands owned by the applicant").	Acknowledged.	
The EIS notes that no natural features, fish habitat, aquatic habitat, significant wildlife habitat, or species at risk were identified on the lands subject to the subdivision proposal. The proposed Draft Plan, however, appears to include portions of the significant woodland in the areas which will be part of the Plan. Clarification regarding this discrepancy is required.	Acknowledged; the report has been updated accordingly.	
Significant Wildlife Habitat and a variety of Species of Concern are noted within the woodland/wetland area to the west.	Acknowledged. Please refer to revised EIS for details	
4. Impact Assessment and Recommended Mitigation Measures	Response	
Based on the Hydrogeological Assessment and the SWM report, the EIS concludes the wetlands within the study area (i.e., to the west) will remain unaffected, hydrologically. It is unclear whether the Provincially Significant Wetland east of the subject lands would, however, be affected by the reduced groundwater infiltration and transition to surface water runoff. Though not located within 120 metres of the site, the PSW could be considered a "sensitive surface water area" as	Full response to this comment provided in Section 6.1 of the updated EIS report. In summary, the PSW is not identified as a groundwater discharge area and, as such, does not receive groundwater inputs from the Subject Property. Subsequently, any loss of infiltration potential on the Subject Property will not affect the	

identified under Section 2.2 of the PPS, indicating that potential impacts to this feature should be mitigated. The report would benefit from language regarding impacts to this feature due to the loss of infiltration on the site and modified surface water runoff flows.	existing hydrogeological form and/or function of the PSW. Surface water runoff discharging to the PSW under the pre-development (existing) condition from the Subject Property will be matched under the post-development condition, resulting in no notable impact to the existing hydrological form and/or function of the PSW.	
The recommended mitigation measures in the EIS are isolated to the Plan of Subdivision area and include erosion and sediment controls and associated monitoring, respect of timing windows for breeding birds (or additional biological review), and the protection and enhancement (with an edge management plan) of a 10-metre buffer (the minimum buffer size) from the surveyed woodlands treeline. This setback also encompasses the recommended 15 metre buffer from the wetland.	No comment, just a statement / prelude to subsequent comments	
Additional mitigation measures are recommended for the protection of Core Environmental Feature, including the use of directional lighting to prevent light pollution, ensuring that Core Environmental Features are fenced at the outermost edge of the buffer to prevent rear lot encroachment. Consideration for homeowner brochures on good stewardship practices for natural heritage features nearby, potential encroachment issues and how to prevent or reduce impacts is recommended.	Acknowledged; the report has been updated accordingly	
The proposed Draft Plan encroaches into portions of the significant woodland and the recommended 10 metre buffer. The Planning Justification Report proposes to apply an OS3 zone for the area where the development encroaches into the features to prevent development. This is contrary to typical recommendations that these areas be kept separate from residential blocks. Adjustment to the Draft Plan to accommodate these features in the Open Space block is therefore recommended, as are additional mitigations measures such as fencing to protect the enhanced buffer (as previously mentioned).	The Draft Plan has been revised to include areas within the 10m buffer as open space blocks	
Details regarding what is proposed for the "additional lands owned by the applicant" and any mitigative measures are absent from the Environmental Impact Report, other than general prohibition of development. It is our understanding, however, that a remnant, non-developable lot, is not advisable or supportable. As such, further details on how this remnant lot is to	No development is proposed. Those lands are not part of the development and through a separate agreement, are proposed to be conveyed to the City.	

be developed or protected in perpetuity (e.g., conveyance to the municipality or application of a conservation easement) is requested along with associated mitigation measures, if applicable.		
Summary	Response	
The draft plan layout and the applications are dependent on the demonstration that there will be no negative impacts on natural heritage and sensitive surface water features/functions. The report was well structured and technical information was well organized. We would request the following information be provided:		
1. Discussion and confirmation that no hydrologic impacts to the PSW to the southeast (as a sensitive surface water feature under the PPS) or confirm that the PSW is not a sensitive surface water feature indicating that Section 2.2 of the PPS does not apply.	Section 6.1 of the updated EIS report for response.	
2. Mitigation measures that confirm light pollution impacts are mitigated (such as through recommendations for use of directional lighting); the outermost buffer to the Core Environmental Feature is fenced to prevent encroachment; and information is provided to adjacent and nearby landowners to support good stewardship practices	At the detailed design stage mitigation measures for light pollution will be implemented. Also, the need for any fencing will be further discussed at that time.	
3. Explanation of how the proposed buffer and woodlands will be protected in perpetuity, particularly in consideration of the current layout which encroaches on the woodland and buffer features – it is recommended that the Draft Plan be revised to ensure these features are within the proposed Open Space Block;	Please refer to the revised Draft Plan. The report has been updated accordingly	
4. Plans for the remnant lot, which will contain the protected features including associated mitigation measures and/or protection mechanisms, if required.	The EIS addresses protection to the natural heritage features and functions associated with the remnant lot. Developments are not proposed in the remnant lot.	
5. Discussion of connectivity and potential connectivity enhancements between adjacent natural areas features and the overall Greenlands network	Acknowledged however, additional opportunities for connectivity in this regard is outside of the scope of this Study (outside of the proposed development Area and EIS Study Area). The Town and Region's EEAC committee are likely to support this initiative.	
Noise Study Peer Review		
RWDI Comments	All Responses Provided by Stantec	
Assessment Approach	Response	

1. The Noise Study reviews the potential sources of environmental noise in the area. a. Transportation noise from the surrounding roadways and railway, which is considered appropriate. b. Offsite stationary sources were assessed from surrounding facilities, which is considered appropriate.	Acknowledged	
2. The submission package includes the appropriate Owners Declaration Statement, as required by the Region. The Consultant's Declaration Statement does not appear to be included, and is required to be provided. As a reminder, the Consultant's Declaration Statement is required to be commissioned by a Commissioner of Oaths (or notarized by a Notary Public).	Noted, statutory declaration to be included in the updated, final noise report. It is our recommendation that Final Noise Report will be provided as a condition of Draft Plan Approval.	
Surface Transportation Noise	Response	
3. Indoor sound level limits for transportation noise are summarized in Section 3.1 of the Noise Study, which appropriately align with the guidance documents.	Noted	
4. Noise Warning Clause and Ventilation requirements for transportation noise are summarized in Section 6.1 of the Noise Study, which appropriately align with the guidance documents.	Noted	
5. Transportation noise levels were evaluated at 6 locations shown in Figure 1 and summarized in Table 4-1 of the Noise Study. The 6 locations are considered to be representative of worst-case locations for each of the Noise Study block IDs (which differ from the Site Plan IDs) covering Block A, to E, and the Amenity Area/Planned Park. The 6 locations are considered acceptable representations of worst-case impacts for the development.	Noted	
6. Aircraft noise was excluded from the assessment, as the development is located outside of the local airport NEF 25 noise contours. This exclusion is considered appropriate.	Noted	
7. Road Data is summarized in Table 5-1 of the Noise Study. The following is noted: a. The future road traffic information for Millenium Boulevard was provided by the Region. The data remains valid at this time. b. County Squire Drive was excluded from the transportation assessment, as traffic data was not provided and volumes were assumed to have an insignificant impact.	Noted	

This is considered an acceptable assumption for exclusion.		
8. Modelling of transportation noise was completed using the STAMSON software package for each worst-case receptor identified. The following is noted: - In general, the STAMSON modelling was completed appropriately with no major concerns. - A sample modelling file for Block C does not appear to be included. Future submissions/revisions to the Noise Study should include all sample modelling files. - Future submissions/revisions of the Noise Study should ensure modelled inputs are correct. For example, the Amenity Area STAMSON file (file AAMHBC.te) was assessed at a receptor height of 7.5 m. Although the corrected height will not affect the results, modelling inputs should reflect the receptor as accurately as possible. - Additional STAMSON Files from another report (600olaaar.te and 600POWNA.te) are included in Appendix E and should be removed.	Stantec estimated noise impacts of Block C using modelled impacts from Block B with an estimated acoustic shielding factor. Stantec will include sample Stampson modelling outputs for Block C in future revisions of the noise study. Regarding modelled receptor heights, Stantec conservatively modelled road traffic noise impacts using reflective ground as a Stampson modelling input. Receptor heights have no impacts on modelled noise levels when using the reflective ground assumption. Stantec notes the comment and will update modelling files to match heights presented in Table 4-1 of the study. Additional modelling files will be removed from report appendices	
9. Table 7-1 summarizes the transportation modelling results for all predicted locations of facades and OLAs. The following is noted: - The results align with the STAMSON modelling results in Appendix E, with minor typos. - Although a STAMSON modelling file was not provided for Block C, the results seem appropriate. - The requirement for the Provision for Air Conditioning is considered appropriate for Block A and B of the development, based on the Noise Study block labelling. - Façade construction meeting the minimum requirements of Ontario Building Code for all development blocks is considered appropriate for the development. - Warning clauses are summarized in Table 7-1 and Section 8.1 of the Noise Study. The following is noted: - The inclusion of a Type C warning clause is considered appropriate for Block A and Block B the development, based on the Noise Study block labelling.	Noted	

ii. No warning clauses are recommended for the amenity areas, which is considered appropriate, based on the results of the Noise Study.		
Stationary Noise – Off Site Sources	Response	
10. The Noise Study initially identifies the surroundings as a Class 2 area, based on observations and measurements during a site visit on September 20, 2024. This is considered appropriate.	Noted	
11. The default NPC-300 guideline limits were applied and summarized in Table 3-2, which is considered appropriate.	Noted	
12. Receptor heights are summarized in Table 4-1 and are considered appropriate based on the anticipated building types within the development.	Noted	
13. A review of the stationary noise sources included in the Noise Study was completed. The following is noted: a. Potential sources of stationary noise considered in the Noise Study were identified during site visits within the area on September 20, 2022 and September 26, 2022. b. Identified significant noise sources include: i. Rooftop HVAC equipment associated with RIM Park, Enova Power/ Alliance Metering Solutions, Container Building (southeast of Enova Power), and commercial facilities southeast of the site; ii. Vehicle noise associated with the Enova Power facility; iii. Cooling towers associated with the Rim Park complex. In general, inclusion of the above equipment is considered appropriate. c. In addition to the above, the following continuous noise sources were noted: i. The Enova Power (formerly Waterloo North Hydro Inc. and Kitchener-Wilmot Hydro Inc.)/Alliance Metering Solutions facility is understood to be operating under the CofA (Air) No. 4794-8K6K5C, which includes an emergency generator. As the emergency generator is visible in available on-line imagery on the south-west portion of the site, an	A. Noted B. Noted C. i) As is visible from satellite imagery, there is an existing two storey residence at 515 Country Squire Road which is located 337 meters east of the emergency generator operated by Enova Power. The closest potential receptor at the Millennium Lands Development given required setback distances from the edge of the property line is 345 meters east of the Enova Power emergency Generator. The Millennium Lands Development receptor location is at the western edge of Block D. As the Enova Power corporation must meet applicable NPC-300 sound level limits at existing receptors, and the Millennium Lands Development receptors are further away than the 515 Country Squire Road existing receptor, by inference then the generator (which is assessed as an independent emergency testing scenario) is considered in compliance. Stantec has excluded the generator based on this assessment. ii) Stantec confirms that the structure identified by RWDI southeast of the Enova Power facility is an emergency generator operated by a separate legal entity. Stantec has included this generator using O.Reg. 524/98 and	

assessment of generator testing noise impacts is required to confirm the NPC-300 guideline limits are met at the proposed development. ii. The container building, located outside of the Enova Power/Alliance Metering Solutions site to the south-east, appears to include an emergency generator. Confirmation is required regarding the type of equipment and included in the assessment, if identified as a significant noise source. d. On review the Enova Power (formerly Waterloo North Hydro Inc. and Kitchener-Wilmot Hydro Inc.)/Alliance Metering Solutions yard, stockpiles are visible in available on-line imagery and appear to be piping. A review of Alliance Metering Solutions yard activities is required, to confirm impulsive noise is not applicable and/or a concern for the proposed development. Documented communications with Alliance Metering Solutions are to be included in future revisions/updates to the Noise Study. e. Representative sound level data for the modelled equipment was taken from Stantec's sound database and measurements during the September 22nd 2022 site visit, which is acceptable. However, source sound level data was not provided. Reference sound level data is required to confirm assumptions are considered appropriate. f. In addition to the sound level data, modelling parameters such as the number of trucks and speeds applied in the noise modelling are to be provided. In general, future submissions/revisions to the noise study are required to include assumptions and inputs covering all types of noise sources. g. HVAC duty cycling of 100% during the daytime (assumed to include evening) and 50% during the night-time is considered acceptable.	that the generator meets the acoustic specifications required for the exemption as the generator does not have a registered environmental approval. D. Per MECP publication NPC-101 "Definitions" the Ministry defines "impulsive sound" as a single pressure pulse or single burst of pressure pulses as defined by IEC I79A. Further, MECP publication NPC-103 procedures, Section 3, "Procedures for Measurement of Steady or Impulsive Sound" provides examples of impulsive sounds which include gunshots, certain explosive pest control devices, and certain industrial metal working operations (e.g. forging, hammering, punching, cutting, forming and molding). Stantec conducted three (3) site visits on September 20th, 2022, September 26th, 2022 and July 7th, 2023 and did not identify any sources of impulsive sound at the Enova Power facility which meet the above definition. Operations observed at the Enova Power facility during the site visit were limited to vehicles entering and exiting the site, picking and loading of electrical equipment onto company vehicles, and unloading of vehicles at the warehouse portion of the facility. E. Noted, Stantec will include reference sound power data for modelled sources F. Noted, input parameters for truck speed and quantity will be included in updated report G. Noted	
14. A review was completed of the sound level measurement procedure. The following is noted:	Noted, Stantec will include weather conditions during site visits	

a. Measurements were completed using a Larson Davis LXT Type 1 sound level meter, following NPC-103. This is considered appropriate. b. Future submissions/revisions to the noise study are required to include weather conditions during the measurement period.		
15. Modelling was completed in the Cadna/A software package. The following is noted: a. The ISO 9613 sound propagation algorithms in Cadna/A are a suitable model. b. The application of a 0.2 general ground absorption factor with 0.8 ground absorption factor applied to areas covered in vegetation. This is considered acceptable. c. The Noise Study indicated that the modelling was completed "consistent with MECP accepted practice", which is considered appropriate. Confirmation is required regarding the Cadna/A options "No Subtraction of negative Ground Attenuation" and "No negative path difference" are selected in the noise modelling, to be consistent with MECP practices.	Noted, Stantec has confirmed that the selection of "No Subtraction of Negative Ground Attenuation" and "No negative path difference" in the Cadna calculation configuration results in no changes of contours of predicted noise impact at the development.	
16. Modelled daytime sound level contours are shown in Figure 2 of the Noise Study. The following is noted: a. Noise contours were provided at a height of 4.5 m, which is considered generally acceptable. As the receptor heights vary from 1.5 m to 10.5 m above grade, the worst case noise contour height should be provided. b. As the OLA height is lower than the provided noise contours, impacts are considered worst-case and acceptable. c. Noise contours are shown for daytime only, and indicated as applicable for night-time periods. This is considered conservative and acceptable.	Noted	
17. Modelled results are discussed as daytime and night-time only, where daytime is assumed to include the evening period. Future submissions/revisions to the Noise Study are required to include the evening period with the results/conclusions. In general, a table of results should be provided, similar to Table 7-1 for Transportation impacts, showing	Noted, Stantec provided assumption in report that daytime noise impacts are representative of evening noise impacts. Stantec will update tables, results and conclusions to include mention specific evening conditions.	

compliance for each section of the development.		
18. The Class 2 sound level limits are shown to be met, based on the 4.5 m noise contours. A comment cannot be provided on compliance from the surrounding stationary noise sources, as insufficient information is currently provided in the Noise Study regarding source sound level data and assumptions. In addition, emergency generator testing and yard activity is required to be considered in the noise assessment.	Reference Stantec comment response 13 c) i) above	
19. A sample calculation for all sources at a representative worst-case point of reception is required, particularly since source data and locations are not provided in the Noise Study.	Noted, Stantec will provide sample calculations for worst-case points of reception.	
20. As the Enova Power/Alliance Metering Solutions facility has the potential to be audible at the development, an MECP Type E warning clause is required to be included.	Based on site visits and existing residences which are in closer proximity to the Enova Power facility, Stantec does not recommend a Type E warning clause. The Enova Power facility was not audible at the Site during site visits.	
Stationary Noise – On Site sources	Response	
21. An assessment of development mechanical systems on the proposed development was not included in the Noise Study. In the absence of specific information, a general discussion should be included in future revisions/submissions of the Noise Study.	Noted, Stantec will provide a general discussion on this topic in the updated report.	
22. When the applicable information becomes available, the Region of Waterloo requires an assessment of the development mechanical systems on itself and its surroundings. Reference to this requirement should be made in the Noise Study. Demonstrated compliance with applicable sound level limits for these sources must be shown prior to final planning approval.	Stantec notes this comment and will provide a recommendation in the updated report that an assessment on on/off site noise impacts from on-site noise sources be conducted when additional mechanical information becomes available	
Conclusions	Response	
23. The Recommendation section of the Noise Study summarizes the mitigation requirements in the Noise Study.	Noted	
24. The report provides no specific concluding statement concerning feasibility of the development. A concluding statement regarding feasibility of the development is needed.	Noted, concluding statement recommending that the Development is feasible will be included in the conclusion	
Summary	Response	

The environmental noise study provided for the 400 Millennium Boulevard development in Waterloo presents an assessment for transportation and surrounding stationary noise sources. The Region of Waterloo seeks assurance that the sound levels and impacts are accurate and complete. Comments provided in this review have the potential to change the outcomes and conclusions of the Noise Study. Revised analysis, additional information, clarification and supporting justification is required.	Noted. A revised report is not included with this submission package in light of additional correspondence with Region staff. An updated report will be provided with future submission	
Key items with the potential to affect the results and conclusions of the Noise Study include the following: • A copy of the reference sound level data and assumptions applied in the noise modelling is required. • A figure showing the stationary noise source locations is required. • Stationary noise modelling is required to consider: ○ The Enova Power/Alliance Metering Solutions emergency generator testing; ○ Alliance Metering Solutions yard activity for the potential of impulsive noise; and ○ Confirmation of the source located outside of the container building (west side), south-east of the Enova Power/Alliance Metering Solutions facility, and if necessary, included in the assessment.	Please refer to above response. In conjunction with future conversation with Region and/or RWDI personnel, these comments will be addressed or taken under consideration as determined to be suitable.	
Without addressing these items, it is not possible to provide assurance that the values, results, and conclusions are reasonable.	Acknowledged	
As revisions to the Noise Study are required for stationary noise only, an addendum is considered to be sufficient. Alternatively, a revised Noise Study can be provided.	Our anticipation is that a revised noise report will be provided with future submission	
The provided rationale is appropriate that the existing receptor at 515 Country Squire Road will be more limiting for the Enova emergency generator than the proposed development based on separation distance. However, the current development plans do not include sufficient detail to support the expected separation distance of 345 m to the nearest development sensitive receivers, including outdoor points of reception. Support for the distance assertion must be demonstrated (ideally visually) in an updated noise assessment	A site plan outlining noise sensitive buildings including the locations of outdoor points of reception and the plane of window of noise sensitive spaces on the site will be submitted with the updated noise study at site plan approval, when it is available	

The provided rationale is reasonable that the emergency generator southeast of Enova Power is assumed to meet the exemption requirements of Section 4.(1) of O.Reg. 524/98. However, item 7 of these requirements is to meet a sound level of 75 dBA at a distance of 7 m from the generator. The sound contours included in the original noise assessment (i.e., Figure 2 of Appendix A) appear to use a sound emission for this source that is much lower than the O.Reg. 524/98 specification (i.e., about 12 dB); hence why reference sound power information must be included per comment 13 (e). Currently, the proposed rationale in the Response Letter and results of the noise assessment appear to be at odds with one another.	A reference sound power level matching a 75 dBA at 7-meter contour will be provide in the updated noise study. The emergency gensets have a daytime noise criterion of 55 dBA at sensitive receptors based on the acoustic area surrounding the site. The approximate setback distance from the genset to the nearest building façades of the Development is over 70 meters. Based on the setback distance and sound power level, the noise impact of the genset will be less than the daytime criteria for emergency source testing	
The observations made of the Enova Power yard during the site visits are noted, including the lack of impulsive noise activity. However, site visits are only representative of conditions at the time and may not capture worst-case operations. The operations described and nature of this facility indicate that such impulses must be assumed to be probable (i.e., the bangs associated with loading heavy equipment). Appropriate worst-case conditions can be confirmed through communication with the facility owner, as requested in the peer review. The Response Letter provides no indication of communication with the facility as requested	The Enova power facility is a storage yard for electrical equipment including transformers, spools of wire, and electrical poles. Loading of electrical materials is typically done with the utmost care to prevent damage during loading and transportation. It is not reasonable to assume that impulse noise is typical of loading operations given the nature and purpose of the materials stored on site. This is further supported by Stantec's three site visits during which no impulse noise was observed during yard activities. Communication with the Enova may not be able to confirm or deny the existence of impulsive sound sources on site as it requires an understanding of the acoustic definition as defined by MECP guidance documents NPC-101 and NPC-103. Further, as identified in our response letter dated July 26, 2024, the MECP provide examples of impulsive sound which include gunshots, certain explosive pest control devices, and certain industrial metal working operations. As none of these activities or similar activities occur at the Enova Facility an assessment of impulsive noise is not required in this case.	

The list of required resubmission items to address comments include but is not limited to:

1. One (1) copy of a Resubmission Letter/Response Matrix addressing all comments received.
2. One (1) copy of a Planning Justification Addendum Letter

3. One (1) copy of a revised Draft Plan of Subdivision (11" by 17")
4. One (1) copy of the revised Max. Unit Yield and Min. Unit Yield Plans
 - a) Incorporate an overlay of a standard building footprint on the westerly lot within Block 13/Stage 1.
5. One (1) copy of Data Charts for each multi-residential block, townhouse building block, and commercial block (RMU-20, R7, C3 zones)
6. One (1) copy of revised Environmental Impact Study
7. One (1) copy of revised Functional Servicing and SWM Report
8. One (1) copy of revised Engineering Plans
9. One (1) copy of revised Transportation Impact Study
 - b) Include updated signal warrant analysis at the University Avenue at Millennium Boulevard intersection with more recent traffic counts
10. One (1) copy of Right-of-Way Cross Section drawings
11. One (1) copy of an Active Transportation Plan