

May 15, 2025

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

Dear Ms. Szilock:

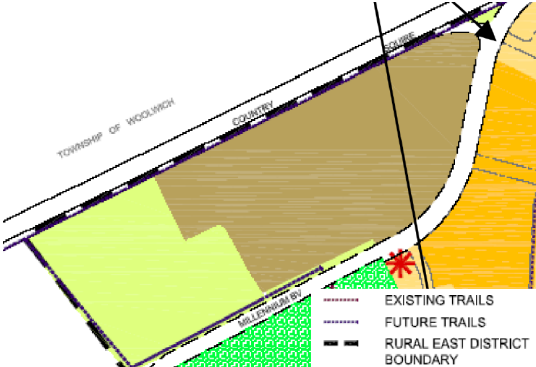
**RE: Official Plan Amendment, Zoning By-law Amendment & Draft Plan of Subdivision
Resubmission #2– Response to Comments
400 Millennium Boulevard, Waterloo
OUR FILE 8784CX**

On behalf of our client, Activa Holdings Inc., and in conjunction with Stantec and Paradigm Transportation Solutions, we have reviewed the consolidated comments provided on March 3, 2025. The following table includes the comments and a response.

City of Waterloo	Project Team Response
Planning Comments	
Provincial Planning Statement 2024	
1. The Provincial Planning Statement 2024 (the "PPS2024") came into effect on October 20, 2024. It replaces the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019.	Noted
2. In your resubmission provide an updated policy analysis determining consistency with the PPS 2024.	Please see included analysis in this letter
Official Plan	Response
3. The Official Plan policy 10.3.1 (9) speaks to employment land conversions through a municipal comprehensive review (MCR), initiated by the Region. Given that the subject lands are being requested to be redesignated from Employment to Low Density Residential, Mixed-use Medium Density Residential and Commercial and have gone through the MCR process, it should be demonstrated how the proposed development conforms to policy 10.3.1 (9).	This matter has not changed from the original application submission. Through OPA 58, staff were originally proposing to designate the entire property Low Rise Residential. Although this matter has been discussed multiple times with City staff, comments are included in this letter to conclude this discussion.
4. In your resubmission, please include an updated policy analysis demonstrating how the	The City did not request such an analysis through the original submission or the response to the first set of City

proposed development addresses OP policy 10.3.1 (9).	comments. This comment is late in the process – however we have included comments in this letter
Node and Corridor Policies	Response
5. It is unclear whether the intent is to maintain the entire site as a Minor Corridor or to designate only the blocks fronting onto Millennium Blvd as a Minor Corridor. Please clarify.	The intent is not to retain the Minor Corridor designation for the entire property. Please see enclosed figure for clarity.
Specific Provision Area 26	Response
6. Wording of SPA 26 should be updated to reflect the proposed development concept. The proposed wording for SPA 26 has not been revised to reflect the changes in the updated draft plan.	We understand the only revisions are one Block reference (now Block 1/Stage 2) and the height (11 m vs 12 m) for lands designated Low Rise Residential. These very minor revisions can be captured in the staff report.
Land Use Schedules	Response
7. Clearly identify all changes proposed to the City Official Plan Schedules by submitting the Maps being reference in the proposed OPA	Figures enclosed for clarity as they relate to Schedule A and Schedule B. The OPA also proposes to remove the lands from Schedule A2. We previously provided Figures as they relate to Schedules A3 and A4 and staff did not have concerns with those Figures.
Zoning Comments	Response
Environmental Buffers and Zoning Setbacks	Response
8. Thank you for placing the environmental buffers associated with the natural heritage features within their own blocks. In this instance, staff do not have any concerns with the requested zoning amendments to allow a reduced interior lot line setback/rear yard setback of 5.5 metres along the side building façades of townhouse buildings and stacked townhouse buildings adjacent to OS3 zoned lands within the R7 and RMU-20 zones. As described in the Planning Justification Report Addendum, the requested reduced interior lot line/ rear yard setback will effectively function as side yards.	Noted
9. Staff will include a site-specific zoning amendment to ensure that the reduced interior lot line setback would only be applicable to side building facades.	Noted
RMU-20 and C3-20 Zoned Blocks – Zoning Matrix	Response
10. Thank you for the submitted Zoning Matrix, it is helpful as it clearly identifies the proposed site-specific zoning amendments for each of proposed zone categories.	Noted
11. However, it must be noted that the Zoning Matrix does not provide sufficient information, generally included in site data charts, to allow staff to conduct a detailed zoning review of the RMU-20 and C3-20 zoned blocks. Therefore,	The plans are not a site plan application and it was previously discussed that the level of detail requested by the City was not possible.

staff will rely on the Zoning Matrix provided to determine any required zoning amendments and will assume that the only required zoning amendments are those identified in the Zoning Matrix.	
12. Staff do agree with the applicant's statement that the detailed designs of these blocks will be further refined as the development progresses, which may or may not result in the need for future minor variances.	Agreed
Freehold Townhouses fronting onto Common Element Road – Block 3, Stage 2 (RMU-20 Zone)	Response
13. The applicant has requested to permit Freehold Townhouse Buildings (Block 3, Stage 2) to front onto a Common Element Road (Block 2, Stage 2), whereas the Zoning By-law requires each individual Freehold Townhouse lot to front onto a municipal road.	Please see revised Draft Plan.
14. As per the submission materials, the intent of the requested amendment is to permit individual lots to be created through Part Lot Control, with access to a common element road. The proposed Freehold Townhouse lots would be parcels of tied land to the common element condo road for road maintenance purposes.	Please see revised Draft Plan.
15. Planning staff have the following concerns/comments regarding the applicant's proposed zoning amendment to permit Freehold Townhouse Buildings to front onto a Common Element Road: • It is unclear how the townhouses within Block 3, Stage 2 can be serviced in compliance with the Building Code. • According to Building Standards staff the proposed servicing of Block 3, Stage 2 is in contravention of the Ontario Building Code. • Planning staff are not supportive of any of the zoning amendments that would facilitate the creation of lots that cannot be serviced. • In your resubmission, reconfigure the proposed development to ensure that all lots can be serviced in compliance with the Building Code.	Please see revised Draft Plan.
Site Design Comments/Draft Plan of Subdivision Comments	Response

North-South Trail Connection and Multi-use Path along Country Squire Road	Response
16. The proposed development should be redesigned to incorporate a north-south recreational trail between Millennium Blvd and Country Squire Rd along the westerly portion of the site. A multi-use path (MUP) should also be incorporated along Country Squire Rd as well as a walkway connection to the MUP from Street One. Please refer to Transportation Services comments and Landscape Architecture comments for details.	The Draft Plan does not need to be 're-designed' to accommodate a trail in the open space blocks. The blocks are wide enough to accommodate a 2.5 m wide trail (as preferred by staff). The owner does not object to the City constructing a MUP on Country Squire Rd. The MUP is not part of the development and should be funded through development charges, as were the MUPs in Beaver Creek Meadows.
17. Creating multiple different walking loops within the proposed development will promote the creation of a healthy lifestyle for residents in accordance with OP policy 3.9.2 (2) (e) providing "integrated and comprehensive cycling and pedestrian systems" and (g) providing "easily accessible and interconnected parks, trails and public gathering spaces".	No response required.
18. Providing residents with recreational trails in different settings (north-south recreational trail and MUP along Country Squire Rd) will better serve the needs of residents and will encourage residents to walk and use other forms of active transportation, improving the overall health of residents.	The owner agrees to include a trail in the open space blocks on the west side of the plan. The MUP on Country Squire Road is not part of the development and is not the responsibility of the owner. It should be funded through development charges.
19. Map 1: Concept Plan of Development of the Rural East District Plan identifies a "Future Trail" connection along Country Squire Rd. See below (purple dashed line), excerpt from Map 1: 	The map is not clear. The Trail should be funded through development charges. It clearly benefits the broader community, including the Township of Woolwich and is not directly related to or within this subdivision.
20. According to policy 6.7.2 Community Trail/Access Link Systems of the Rural East District Plan the "intent of the Community Trail system within the Rural East District is to provide residents and visitors with the opportunity to experience passive and active recreational pursuits, as well as an alternate transportation function along a continuous and connected trail system".	See response above.

21. The incorporation of the north-south recreational trail along the westerly portion of the site and the MUP along Country Squire Rd with a walkway connection from Street One would help to meet the intent of the Rural East District Plan policies, encouraging physical activity and improving the quality of life of residents.	See previous responses.
Park Block (Block 5, Stage 2)	Response
22. The required parkland dedication is 5% for residential development, having a density of less than 100 units per hectare. Staff have confirmed that the applicant has already contributed parkland and cash-in-lieu of parkland at the non-residential rate of 2% through the Carriage Crossing subdivision (30T-08401) for the subject site, therefore the outstanding parkland dedication requirement is 3% for the residential development on the subject lands. The 3% parkland dedication requirement for the subject lands is 0.42936 ha in accordance with the Planning Act and the City's Parkland Dedication By-law, whereas the Park Block is 0.406 ha in size. Please refer to the Parks, Forestry and Cemetery Services (PFCS) comments as it relates to the parkland needs for the subject lands	The Park Block has been increased in size such that it represents the required conveyance. Please refer to the revised Draft Plan.
23. Should the Park Block be moved adjacent to the SWM ponds as requested by PFCS, a walkway connection should be provided to the north-south recreational trail between Block 2, Stage 3 and Block 13, Stage 1.	The Park Block is not proposed to be moved.
Servicing Connection to 515 Country Squire Rd	Response
24. 515 Country Squire Road is currently on private services and only has access to municipal water services along Country Squire Road.	Noted
25. In your resubmission, please demonstrate that a functional sanitary servicing connection is feasible through Multiple Residential Block 2, Stage 3 to service 515 Country Squire Road.	Through discussions with the City, it has been concluded that a gravity sanitary connection to 515 Country Squire Road cannot be achieved due to low cover at property line (~0.3m cover). A future forcemain connection is shown on the revised Servicing Plan, connecting to proposed MH 174A, from which it flows by gravity to the subdivision sanitary sewer system
26. Provide a servicing easement in favour of the City, which would allow the owner of 515 Country Squire Road to connect to municipal sanitary services in the future. When the owner of 515 Country Squire Road is ready to connect to sanitary services the City's easement will be replaced with a private easement in favour of 515 Country Squire Road.	Easement does not need to be shown on the Draft Plan. It is shown on the applicable engineering plans. A condition of approval can require the conveyance of the easement.

27. Every property in the City should be connected to municipal services when there is an opportunity and ability to connect. Staff are trying to ensure services are available to the property owner of 515 Country Squire Rd when they are ready to connect.	No response required.
28. Staff notes that during a follow-up discussion the applicant had suggested a 5 metre wide servicing easement in favour of the City	The engineering plans illustrate the easement. A condition of approval can be included that requires the conveyance to the City.
Retaining wall along Country Squire Road	Response
29. Staff continue to have some concerns with the 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. Staff are concerned that it will be difficult to maintain such a substantial retaining wall given that it spans 15 separate owners. Coordinating efforts to maintain the wall overtime may be problematic given that it is in separate ownership. All efforts should be made to either remove the retaining wall or significantly reduce the height of the retaining wall.	As discussed during our meeting on March 5, 2025, there are several site constraints driving the need for the proposed retaining wall. The proposed Street One right of way elevation sits much higher than Country Squire Road due to the need to maintain minimum cover over the storm sewer system to direct site drainage to the proposed SWM pond, as well as achieving minimum depths for the sanitary sewer system. The grade differential is being mitigated with transition slopes at walkout lots and a retaining wall. At the detail design stage, when building footprints will be known, the location of the transition sloping and retaining wall heights will be reviewed in greater detail to look for opportunities to mitigate the retaining wall heights. It was also discussed during our meeting that the retaining wall will be owned by each individual landowner and maintenance responsibilities will be registered on title. The retaining wall would be maintained in a similar fashion to how a homeowner would maintain their section of roof in a street fronting townhome.
30. As part of the first submission post-circulation comments Engineering Staff asked that a plan be provided for the "retaining wall maintenance and access. Demonstrate how homeowners will be informed about the retaining wall ownership and maintenance obligations, whether through a common element condo or other means" (Comment No. 108, post circulation comments dated June 21, 2024).	The subdivision agreement can include a clause for the affected Blocks providing the owners notice of their responsibility to maintain their portion of the retaining wall.
31. The following response was proved in the 1st Submission Response Matrix: "at the detail design stage the retain wall access and maintenance will be determined." Planning staff are of the opinion that this response does not sufficiently address the concerns raised.	Retaining wall maintenance access can be provided via Country Squire Road as the open face of the wall will face Country Squire Road – this would be the most logical access point and does not require an easement. Furthermore, as each homeowner will be responsible to maintain their share of the wall, access to the backyard through the lot is also an option.
32. In your next resubmission, please fully address the following questions: a. How will the maintenance of the retaining wall occur overtime, given that there are potentially 15 different property owners?	Each homeowner will be responsible for maintaining their portion of the retaining wall. They will be advised through clauses in the subdivision agreement. The wording of the clauses can be determined after draft approval and would be subject to City review and approval.

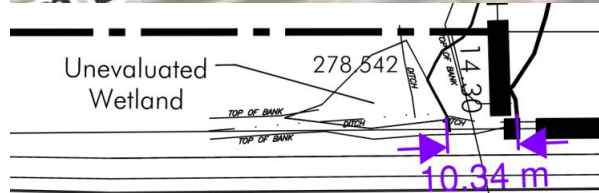
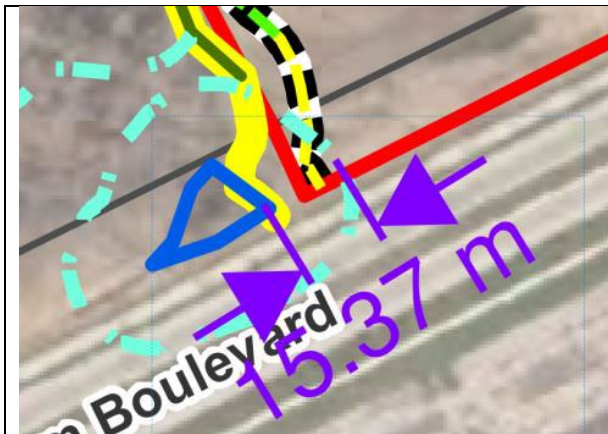
b. How will future homeowners be informed about the retaining wall ownership and maintenance obligations?	Furthermore, maintenance responsibilities of the retaining wall will be registered on title for each lot.
Urban Design	Response
33. Further to Planning and Transportation comments, the provision of a multi-use trail for recreation is strongly encouraged along the Country Squire frontage as well as along the western site boundary to create a loop around community.	See previous responses.
34. Urban design staff argue that a perimeter loop would not be redundant, as it would offer a recreational loop within a natural setting without the need to cross a multitude of driveways on a suburban street. They would be provided for different functions beyond circulation and offer wholly different experiences for quality of life.	See previous responses.
35. Midblock connections should be strongly considered between Country Squire and Street One – ideally at the terminus of north-south streets.	Connection can be included in Stage 4 through future site plan application on the understanding the city will construct the MUP on Country Squire Rd funded through development charges.
36. For consideration at Site Plan - The grade change along Country Squire could be dealt with through a stepped naturalized landscape that could both account for the grading needs while providing a vegetated buffer between the community and agricultural lands to the north. Here is an example of such a treatment: 	Please see response to Comment No. 29. Once the house footprints are known at the detail design stage, opportunities to introduce transition slopes/naturalized landscape will be explored. We kindly note that this will take up additional space to implement than the traditional retaining wall, as such, there could be special constraints prohibiting us from implementing this approach. We will review further at detail design.
Environmental Planning	Response
37. As a result of the recent shift in planning responsibilities from the Region to the City, which took effect January 1, 2025, City staff have reviewed the resubmission in the context of the Region's previous Environmental Planning comments and the natural heritage policies of the Regional Official Plan, in addition to the City's previous comments and Official Plan.	Noted
38. The Draft Plan of Subdivision has been revised to place the natural heritage buffer within separate Blocks (Block 16, Stage 1, Block 6, Stage 2, and Block 3, Stage 3). Further,	Noted

through the Comment-Response Table, MHBC has confirmed that the buffer Blocks will be conveyed to the City as a condition of draft plan approval, noting that the buffer Blocks will then be subtracted from the lot area for the purposes of calculating parkland dedication. This addresses staff's previous comment. However, per Comment #47 below, the configuration of Block 6, Stage 2 may need to be modified.	
39. The servicing easement for 515 Country Squire Road has been eliminated. If the easement is re-introduced and is within the natural heritage buffer, the EIS will need to be revised to address the limitations and/or constraints posed by the servicing easement. Staff also note that while MHBC suggests the City could provide a service connection from 2025 University Avenue, this would be less preferable due to the length of connection through the Core Natural Feature and wetland.	The owner of 515 Country Squire Rd can provide an EIS if they connect to municipal services. The easement itself does not include any site works that would impact the buffer or feature – it is merely a legal reference.
40. With respect to the proposed OPA, Figure 5 of the Planning Justification Report Addendum, which shows the proposed amendments to Schedule A, appropriately maps the natural heritage buffer areas as 'Open Space'. Similarly, Figure 26, which shows the proposed amendments to Schedule A3, appropriately maps the natural heritage buffer areas as 'Parks and Other Green Space', and Figure 27, which shows the proposed amendments to Schedule A4, appropriately maps the natural heritage buffers areas as 'Other Open Space Land Uses'. Staff note, however, that through OPA 58, which was adopted by Council on December 2, 2024, the 'Other Open Space Land Uses' category on Schedule A4 is removed. If the Province approves OPA 58 prior to these applications being brought to Council for a decision, the amendment to Schedule A4 will not be necessary. Staff also note that per Comment #47 below, the configuration of Block 6, Stage 2 may need to be modified.	Noted re OPA 58.
41. With respect to the Rural East District Plan, Figure 6 of the Planning Justification Report Addendum, which shows the proposed amendments to Map 1, appropriately maps the natural heritage buffer areas as 'Open Space'. To be consistent with how the other amendments are shown, the 'Open Space' lands should be hatched and labelled as 'Lands to be Designated Open Space'. Staff also note	Noted – staff can address if required in their report to Council.

that the amendment text in 'Appendix 2: Draft Rural East District Plan Amendment & Schedule' only references the change from 'Employment' to 'Residential (Medium Density), Convenience Commercial and Parks', not 'Open Space'. While this wording should be modified to include 'Open Space', since the 'Open Space' areas are mapped correctly (subject to resolution of Comment #47 below), and the District Plan is a non-statutory document, it is not imperative.	
42. Through previous comments, staff noted that while the EIS referred to a Core Natural Feature being mapped adjacent to the subject lands, based on the mapping 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. the Significant Woodland) does extend on to the subject lands. Staff appreciate that the reference has been corrected on page 18 of the EIS, but note pages 17, 23, 28, and 34 still reference the feature as being adjacent (west) of the subject lands rather than present within the subject lands.	The references have been changed throughout. It is noted that this text-based comment does not affect the conclusions of the EIS.
43. Through previous comments, staff noted that while the EIS stated under Section 4.3 that "No other natural heritage features or areas, as defined by the PPS, have been previously identified in the Study Area", the EIS completed in 2008 confirmed that "the woodland on the western part of the subject lands provides significant wildlife habitat for breeding amphibians." However, no reference to the previously identified SWH for amphibian breeding has been included in the updated EIS. Since anuran surveys were not undertaken for the current EIS, it is reasonable to include the results of the previous EIS. Within the current EIS, only "potential" amphibian breeding habitat is referenced. Reference should be made to the habitat determined present during the 2008 EIS if surveys for that habitat type were not conducted and evaluated more recently. Staff are comfortable proceeding with the understanding that the habitat determined to be present during the 2008 EIS is present.	Acknowledged; the report has been updated accordingly.
44. There appears to be a minor discrepancy in Section 4.4.2 of the EIS with respect to the total number of 149 plant species observed and the numbers of native (91) and non-native (50) species, and while a total of 6 Regionally rare species are listed in Appendix C, mention of	Section 4.4.2 has been updated accordingly.

Yellow-seed False Pimpernel is missing from the discussion in Section 4.4.2.	
45. Through the Comment-Response Table, Stantec confirmed that detailed locations of the confirmed and candidate SWH were not completed as part of the assessment and that it is inappropriate to map the exact locations when additional detailed investigations have not taken place to further refine boundaries. Staff are comfortable proceeding with the understanding that the SWH will be assumed significant throughout the suitable ELC communities within the Core Natural Feature.	Acknowledged.
46. While some additional discussion has been included under Section 6.3 of the EIS to demonstrate how the proposed buffers will ensure the protection of the natural heritage features and their ecological functions, there remains no specific discussion regarding the proposed drainage feature (clean water collector/swale) and outfall in Block 3, Stage 3, as shown on Drawing C-100 in the Functional Servicing and Stormwater Management Report (FSR). No details on the form of the drainage feature have been provided and while Sections 5 and 6.2 of the EIS note that minor grading is proposed within the 10 metre woodland buffer, no discussion related to the outfall within the buffer (outletting into the feature itself) is provided. The EIS needs to be revised to address the following: Impacts to Significant Woodland/Wetland – Although Appendix G of the EIS discusses the groundwater and surface water level monitoring conducted, no discussion of the results of the water balance assessment contained within the FSR is included in the EIS. The EIS needs to be updated to relate the results of this hydrological study to the environmental considerations associated with the outlet of the drainage feature into the Core Natural Feature. The FSR concludes that feature water balance is achieved through conveying 'clean' surface water runoff to the wetland with the goal of maintaining annual existing condition runoff rates. In order to reach the wetland, the runoff will need to flow through the woodland (>50m), and it is also unclear whether the	Additional detail is provided in Section 5 regarding proposed developments and grading to support the Project. The results of the water balance and an updated impact analysis concerning potential changes to wetland hydrology have been included in the updated EIS under Section 6. Consideration will be given to modifying the edge management plan to accommodate the conditions of draft plan approval. The EIS has been updated accordingly throughout concerning reference to the Edge Management Plan. Maintenance of the drainage feature would be split along ownership lines.

potential tolerance of the Significant Woodland has been considered in relation to the change from dispersed to concentrated flow. Potential impacts associated with the outfall into the Core Natural Feature need to be addressed from a natural heritage perspective, including the form of the outlet as well as quantity and quality of water conveyed into the feature. • Edge Management Plan – The Edge Management Plan shows proposed plantings located through this alignment. It is unclear whether the Edge Management Plan has been prepared in consideration of the location or long term-maintenance of the drainage feature and outfall. Consistent with previous comments, 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 Management Plan will be impacted by the proposed drainage feature (e.g. timing of planting, restrictions on planting, recommendations for servicing installation, etc.). • Maintenance Responsibilities – Details on who will be responsible for the long-term maintenance of the drainage feature and outfall where it exists on lands to be conveyed to the City have not been provided. Is it proposed that there will be split ownership and maintenance responsibilities or that there be an access easement over the City-owned portion?	
47. The MASM1-12 community was previously flagged as not being accounted for in the proposed wetland buffer. While the Comment-Response Table notes that the report and figures have been updated accordingly, and Figure 4 of the EIS shows a 15 metre buffer, the buffer is not accounted for on Figure 3 and, based on the Draft Plan, the buffer appears to be approximately 10 metres.	Upon further consideration, the EIS has been updated, whereby a 10m buffer is considered appropriate for this feature. Additional text rationale and consistent figures have been included in this update. Please note the MASM1-12 is dominated by invasive species (Common Reed; <i>Phragmites australis</i>) with limited standing water observed during all site visits and as such, exhibits low habitat quality. The feature is small (0.02ha) and borders the FOD unit and cultural meadow / manicured grass vegetation associated with the road right-of-way. This feature was staked in the field as we were unsure of



If a 10 metre buffer to this feature continues to be proposed, the EIS must demonstrate that it is suitable. Alternatively, Block 6, Stage 2 would need to be modified to accommodate a 15 metre buffer.

its size at the time. It is classified as "Other Wetlands" in accordance with the City's OP. In accordance with OP Policy 8.2.5, development or site alteration is not proposed within the feature. It is Stantec's opinion that a 10m buffer is considered appropriate to protect this feature from disturbance associated with the proposed development. If the feature is being used by local wildlife, it is anticipated that the habitat is more likely to be impacted more negatively by noise pollution and pedestrian traffic associated with the adjacent road and sidewalk, which are closer in proximity (~5m).

48. Although Transportation Services staff had previously requested a north-south pedestrian/active transportation connection (i.e. a trail) along the westerly portion of the development, no trail is proposed. If a trail is introduced and is within the natural heritage buffer, the EIS will need to be revised to address the trail, and the trail should be located as far as possible towards the outside edge of the buffer, away from the feature.

Trail accommodated in Open Space Blocks – outer edge, 2.5 m wide per staff direction.

49. Through the pre-submission consultation process and through previous comments, it was noted that monitoring in accordance with the City's Development Monitoring Protocol would be required for terrestrial/biological resources, groundwater, and stormwater management, and that a proposed Terms of Reference (TOR) for the pre-construction stage (i.e. the two years prior to grading) would need to be submitted for review and acceptance.

Acknowledged. A TOR for the terrestrial/biological component of the Development Monitoring Program will be prepared under separate cover as a condition of Draft Plan approval. To support advanced monitoring prior to grading, we propose completing two site visits using transect surveys to inventory the wetland and terrestrial vegetation within a 60m radius of the proposed outlet location in 2025. One survey will be completed in spring/early summer 2025 and one in fall 2025. The program will also focus efforts on the natural heritage feature boundary/transition zone on the Subject Property to support additional documentation of existing conditions prior construction. The natural heritage feature (woodland/swamp) feature boundary/transition zone as it currently exists located west of the existing agricultural field, will include monitoring up to 15m (i.e. monitoring of the vegetation from the feature limit extending to 15m to the interior habitat).

With respect to the terrestrial/biological component, through the Comment-Response Table, Stantec notes that an EIS TOR was prepared and approved by the agencies. Development monitoring following the City's Development Monitoring Protocol is separate from the monitoring/field work associated with an EIS, although there may be some overlap.

Each visit will consist of a photographic inventory of vegetation units (i.e. species and health) and general

A TOR for the terrestrial/biological component remains outstanding. With respect to the groundwater component, through the Comment-Response Table, Stantec notes that a groundwater monitoring TOR will be prepared for the pre-construction (Stage I), during-construction (Stage II), and post-construction (Stage III) phases during detailed design, and that both groundwater levels and chemistry will be monitored. This will address the groundwater component. Stantec also notes that pre-construction 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 in March 2022 and April 2023, respectively, and is on-going, with the results included in the Hydrogeological Technical Memorandum. With respect to the stormwater component, Section 8.9 the FSR states that a detailed during-construction (Stage II) and post-construction (Stage III) monitoring plan will be prepared for the proposed stormwater management facility during detailed design (Section 8.9) and, as previously confirmed, this will address the stormwater component. The Development Monitoring Protocol was previously provided as a PDF and can be provided again, but it is also available here: https://www.waterloo.ca/en/government/appendices.aspx.	<i>documentation of site conditions. Data collected will identify:</i> <i>1. Condition (health) of vegetation including individual trees;</i> <i>2. Evidence of local soil movement;</i> <i>3. Evidence of development and human activity encroachments;</i> <i>4. General fish and wildlife observations; and,</i> <i>5. Overall conditions of the unit observed.</i>
50. Based on the review undertaken to date, the following will need to be included as conditions of draft plan approval: • Conveyance of Block 16, Stage 1, Block 6, Stage 2, and Block 3, Stage 3 to the City, free of charge and clear of any encumbrances, for open space and buffer purposes (subject to the resolution of Comment #47 above) • Removal of refuse/garbage from the natural features and buffers that are being conveyed to the City (Block 16, Stage 1, Block 6, Stage 2, and Block 3, Stage 3)	<i>Noted – also note that the Open Space Block in Stage 2 is Block 5, not Block 6.</i>

• Assessment of any trees approved for removal for bird nests/bat roosting habitat in accordance with the Migratory Birds Convention Act and the Endangered Species Act • Prohibition of clearing of vegetation during breeding bird season (April 1 – August 31) unless it can be ascertained that the clearing will not have the potential to disturb or destroy migratory birds or their active nests • Prohibition of grading within open space buffers during breeding bird season (April 1 – August 31) unless it can be ascertained the proposed works will not have the potential to disturb or destroy migratory birds or their nests • Approval and implementation of a pre-, during- and post-construction monitoring program • Approval and implementation of a Landscape Plan that includes buffer plantings and enhancement/restoration measures • Approval and implementation of an Invasive Species Management Plan	
Transportation Services	Response
51. Drawing C-200 of the engineering drawing set provides proposed cross-sections diagrams. Please revise the cross section as per the following comments: • Vehicle travel lanes shall be 3.5m wide. The extra 1.2m of each travel lane should be reallocated to the boulevard.	Cross sections revised as requested. These were circulated to the City on May 5, 2025 and found satisfactory
52. As per the Sidewalk Policy, the applicant is required to construct a 3m wide multi-use path (MUP) along Country Squire Road. In the future when 2025 University Avenue is developed, this will provide a desirable walking loop for all residents in this area.	See previous responses. The owner is not required to construct multi-use pathways external to the development that serve the broader community and the adjacent Township.
53. Given that an MUP is required along Country Squire Road, a second connection from Street One to Country Squire Road should be provided to facilitate access to the MUP.	Stage 4 can include a pathway easement at the time of site plan approval to provide a second access to the City's MUP on Country Squire Road if constructed. An appropriately worded condition can require the easement.

54. All costs associated with re-striping the westbound right turn lane on Millennium Boulevard will be at the cost of the Owner.	Noted.
55. Staff appreciate the updated signal warrant analysis provided by the applicant and acknowledge that a signal is not forecast to be warranted as a result of this development.	Agreed.
56. Staff recognize that a Traffic Calming Plan shall be required through an appropriately worded draft plan approval condition. This plan should consider opportunities to introduced raised crossing near the Block 17 walkway connection.	The following can be included: "Prior to final approval, the owner shall prepare and submit a Traffic Calming Plan for public roads within the limits of the Draft Plan, to the satisfaction of the Director of Transportation. Any recommendations in the Traffic Calming Plan shall be implemented through the subdivision agreement, at the owner's expense."
57. All walkway connections shall be 3m wide as per the Comprehensive Engineering and Landscape Manual.	Noted. The walkway block is 4 metres wide to allow 0.5 mow strip on either side, per City standards.
58. Ensure all infrastructure complies with the CELM.	Noted – at the detailed design stage, the infrastructure will be designed per CELM
59. An additional north-south Recreation Trail should be provided between Millenium Rd and Country Squire Road. The recreational trail connection should run along the westerly portion of the development, parallel to the woodland/wetland buffer or potentially within the woodland/wetland buffer subject to environmental analysis. - Implementing this recreational trail and MUP along Country Squire Road provide opportunities for recreation and provide future connections to adjacent parcels. - Chapter 3 City Form of the Official Plan Section 3.9.2 Neighborhoods outlines that individual neighborhoods will contribute to the City of Waterloo as a complete community by providing safe and healthy environments that are well connected, facilitate social intersection and foster a sense of community. The City will plan for neighborhoods that provide safe and healthy living environments, and promote healthy lifestyles by: g) providing easily accessible and interconnected parks, trails and public gathering spaces that feature a high standard of design, and provide for four-season accessible recreational opportunities, balanced with conservation of the environmental attributes.	A trail can be accommodated within the open space blocks (recommended buffer). Please refer to the Grading Plan prepared by Stantec. The trail is proposed to connect to the City's MUP along Country Squire Rd.

60. Prior to the initial registration, the Owner shall pay \$50,000 to the City of Waterloo for the construction costs of any traffic calming measures, that the City deems necessary, within the laneway of RIM Park (2001 University Avenue East) between Millenium Blvd and University Avenue East, as a result of cut-through traffic caused by the development at 400 Millenium Blvd through the RIM Park facility. Traffic calming measures may include, but not be limited to, speed humps, raised crosswalks or pedestrian crossovers and shall be determined by City staff on or before two (2) years post full build out.	In consideration of this request and to avoid a scenario where the owner provides upfront payment for units that may not be constructed for many years on Street Two, we propose the following wording for a draft plan condition: "Prior to the Registration of Stage 3, the owner shall conduct traffic counts, to the satisfaction of the City, on Park Lane, for vehicles that originate from or are travelling to the subdivision. If the traffic counts conclude that unacceptable levels of cut-through traffic from the subdivision are using Park Lane to access University Avenue East (or are using Park Lane as a route from University Avenue East to the subdivision), the owner shall provide the City with securities, in a format equivalent to a Bond or Letter of Credit, in accordance with the accepted Traffic Calming Plan for Park Lane, to the satisfaction of the Director of Transportation."
Development Engineering	Response
61. During detailed design, the City requests an analysis of any point discharge locations (including CWC discharge) to evaluate their potential impacts on the wetland. This analysis should ensure that the reconfiguration from dispersed to concentrated flow does not lead to adverse erosion or other environmental impacts along the discharge path, including within the forested area before the wetland	Acknowledged, this will be addressed at detailed design stage
62. Note that Development Engineering does not support freehold townhomes as noted in the Planning Justification Report if they are proposed to be fronting onto a private easement.	Please see revised Draft Plan
63. The documentation provided has been reviewed to a level appropriate for this stage. More detailed and comprehensive feedback will be provided during the detailed design phase.	Noted
64. Development Engineering is generally satisfied with this submission and supports the approval of the Draft Plan of Subdivision provided the following: • Provide a servicing easement to 515 Country Squire Road. Please relocate all condominium service infrastructure outside the designated easement area.	Please refer to Servicing Plan for the location of the easement
Landscape Architecture	Response
65. As a reminder, 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	Noted

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.	
Open Space Connectivity	Response
66. Comment response indicates that the revised Urban Design Brief will be provided in a future submission. Please ensure that the connectivity between the SWMF and the Park is identified in the subdivision fabric between blocks 2 and 3. As has been acknowledged in the comment response, connection opportunities shall be identified and refined at the detailed design stage.	Final Guidelines can be required as a condition of draft plan approval.
Block 15 - SWMF	Response
67. Staff appreciate the adjustments that were made to the SWM pond to better align with the standards outlined in the CELM (Section 3.2.5). Staff note that the revised space between the trail/access and the north limit of the pond (to be defined by chain link fence) is currently ~1600mm which is not wide enough to accommodate a mow strip and tree planting. Staff understand that there may be constraints preventing a wider setback between the trail and the pond lot line; however, in order to ensure that tree planting is provided adjacent to the pond feature and trail, a portion of Block 14 that abuts the storm block shall be wide enough to support large growing shade tree planting at an appropriate offset from the fence and to the satisfaction of Landscape Staff. This requirement shall be noted in an appropriately worded Draft Plan condition, for example: • <i>As part of the submission of a site plan application for Block 14, Stage 1, pursuant to Section 41 of the Planning Act, the Owner shall demonstrate to the satisfaction of the Director of Engineering that Block 14, Stage 1 can be designed with a landscape strip wide enough to support large growing shade trees (as outlined in the CELM), planted at an appropriate offset from</i>	Per discussions with the City in the meeting on March 5, 2025, a 3.0m wide vegetated strip will be provided along the southerly limit of Block 14. This along with the 1.6m vegetated strip along the northerly boundary of the SWM pond will form a 4.6m wide vegetated strip that can be used to support tree plantings.

<i>the fence abutting the Stormwater Management Block (Block 15, Stage 1).</i> Finally, Staff expect that the minimum 1600m setback will not be further reduced at the detailed design stage considering the level of Draft Plan detail provided for pond function (Refer to Civil Engineering Staff comments for further feedback).	
Woodland Buffer	Response
68. Refer to Transportation Services comments regarding the request for trail within the 10m woodland buffer creating a complete connection between Millennium Boulevard and Country Squire Road. Engineering Landscape Staff support this directive. In the interest of minimizing impacts to the feature, Staff request that a slightly narrower asphalt trail (2.5m wide) is incorporated. For minimum maintenance considerations, this trail should be offset 1.05m from the east (development) side of the buffer with a 900mm wide mow strip provided on both sides (buffer chain link fence posts set 150mm within buffer per CELM). Additionally, enhanced planting shall be provided on the feature side of the trail, discouraging pedestrian movement into the woodland (details to be reviewed through the engineering stage). Final material, layout and grading etc. will be determined through the detailed design stage, but feasibility of the trail to be demonstrated on the functional grading plan, prior to Draft Plan Approval. It shall be designed in accordance with the CELM and in consultation with the City's Environmental Planning, Landscape Architecture, Engineering and Active Transportation Staff.	The design has been updated to include the proposed trail within the Woodlot Buffer – please refer to revised grading plan
69. Staff have reviewed the Edge Management Plan for the woodland buffer and note that the comments related to plant list and species locations have been addressed. As highlighted previously, refinements to this plan will be required through the detailed design stage, pending the alignment of the trail, required enhancements to discourage pedestrian entry into the feature and any other feedback from Engineering, Environmental Planning and Forestry Staff prior to final approval.	Noted
70. As noted previously, a stewardship plan should also be included as supplement to the tree protection and management notes. This plan would be implemented following construction works for the purpose of monitoring and	Noted

mitigating potential tree hazards that may arise in proximity to future residential, park or trail lands. As noted in the consultant's comment response, this plan can be provided and reviewed during the detailed design stage.	
71. Further, refer to Environmental Planning comments regarding modifications to the Edge Management Plan that may be required in relation to the constraints associated with the new drainage feature. As noted, the specifics of this plan will be refined during the detailed design stage, but these constraints should be examined now to determine overall scope and feasibility of the proposed buffer works. Please demonstrate these conceptually and through notations as required on the Edge Management Plan.	
Country Squire Road	Response
72. Refer to comments provided by Active Transportation Services as it relates to the requirement for a 3m MUP along the south side of Country Squire Road (per Sidewalk Policy) as well as a connection to the MUP from proposed Street One. Feasibility of the MUP and Street One connection to be demonstrated on the revised Draft Plan.	See previous response
73. As a follow up to the previous comments, Staff requested a concept for the landscape treatment along the south side of Country Squire Road at the pre-consultation stage. Please refer to item #126 (page 20) of the City's post-circulation comments dated January 21, 2024 for details. Further, this concept should now consider the required 3m wide MUP per Transportation comments. Staff acknowledge that the future submission of this concept has been referenced in MHBC's cover letter dated November 22, 2024. Staff look forward to reviewing this plan, once provided.	The City will be constructing a MUP on Country Squire Rd. The rear yards of the Lots in Blocks 2 and 3 abut Country Squire Rd. Landscaping treatments in these rear yards would be determined by the homeowners. As staff is aware, there are also retaining walls that would impact landscaping treatments. Block 2/Stage 3 and Block 1/Stage 4 are subject to Site Plan Approval. Landscape Plans for both Blocks can be provided and ultimately approved by the City through that process. The owner is not responsible for landscaping the boulevard along Country Squire Rd.
Parks, Forestry and Cemetery Services	Response
Parks, Forestry & Cemetery Services (PFCS) staff have reviewed the submitted material and provide feedback below:	
74. The parkland dedication shall be in accordance with the Planning Act and the City of Waterloo Parkland Dedication bylaw (2022-073). The total parkland dedication required is 0.42936 ha, however, the second submission indicates 0.406 ha of parkland will be provided. PFCS requires 100% parkland dedication and does not support the collection of any cash-in-lieu of parkland.	Agreed – Block 5 has been adjusted accordingly – please see revised Draft Plan.

75. PFCS requests that the applicant consider exchanging the proposed Stage 2, Block 5 (park) with the Stage 1, Block 14 (multiple residential) so that the subdivision parkland and SWM pond are adjacent and future residents may enjoy the combined, complimentary uses. Block 14 being 0.423 ha in size would satisfy the parkland dedication requirement.	This matter was considered. The Park in Stage 2 assists with maintaining water balance.
76. For clarification, fencing is required where private property abuts public lands. When referencing the current draft plan submission (September 2024), fencing will be required: a) Stage 1, between i. Block 14 (multiple residential) and block 15 (stormwater management pond) b) Stage 2, between i. Block 1 (multiple residential) and block 6 (open space) ii. Block 5 (park) and abutting block 1 (multiple residential) iii. Block 5 (park) and abutting block 13 (residential) iv. Block 13 (residential) and abutting block 16 (open space) c) Stage 3, between i. Block 2 (multiple residential) and abutting block 3 (open space) Fencing is not required in Stage 2, between block 5 (park) and block 6 (open space).	Noted – this can be addressed through a condition of approval.
Building Standards	Response
77. Applicants should ensure compliance with OBC article 7.1.2.4. can be achieved.	No building permits are proposed at this time.
78. In regard to the sanitary and storm running east to west through block 3, if municipally owned further details will be required to confirm if a temporary shared private servicing agreement (SPSA) with alternative solution (AS) would be required. • An SPSA & AS would be required if there is a period of time where services are privately owned with multiple buildings connecting into services on separate properties before public services. In this scenario should it be proposed, a temporary SPSA and AS would be required which would	Noted, this was discussed in the meeting on March 5, 2025. Blocks 2 and 3 in Stage 2 have been merged into a single Block

dissolve upon city assumption of the services. (Similar to a phased condo approach)	
79. The CBO would be open to further discussion regarding this design approach.	Not required.
80. If the proposal is for these services to be on private property with the condominium application imposing property lines in accordance with the condominium act, (more than one building on more than one property connecting to services before it reaches public services) - it is in contravention of the building code 7.1.2.4.	This is not proposed.
81. There is little appetite in new development applications for the city to enter into a 3rd party agreement with alternative solution unless there are extenuating circumstances where it would prohibit development. In this subdivision, it would appear that compliance could be achieved.	Noted, this was discussed in the meeting on March 5, 2025. Blocks 2 and 3 in Stage 2 have been merged into a single Block
82. No Water service is shown servicing internal units. The applicant should provide plans to indicate how water will be provided for further comment. 7.1.2.4. Separate Services (1) Except as provided in Sentences (2) and (3), piping in any <i>building</i> connected to the public services shall be connected separately from piping of any other <i>building</i> , except that an ancillary <i>building</i> on the same property may be served by the same service. (See Note A-7.1.2.4(1)) (2) No <i>plumbing</i> serving a <i>dwelling unit</i> shall be installed in or under another unit of the <i>building</i> unless the piping is located in a tunnel, pipe corridor, common <i>basement</i> or parking garage, so that the piping is <i>accessible</i> for servicing and maintenance throughout its length without encroachment on any private living space, but this Sentence does not prevent <i>plumbing</i> serving a unit located above another unit from being installed in or under the lower unit. (3) <i>Water service pipes</i> or <i>building sewers</i> serving <i>buildings</i> located on the same property may connect into a <i>private water supply</i> or a <i>private sewer</i> conforming to Article 7.1.2.5.	Please see revised Draft Plan. Blocks 2 and 3/Stage 2 have been merged into a single Block.
Noise Peer Review Comments	Response
83. The noise peer review comments are still outstanding and will be forwarded under a separate cover. Please note that staff comments are subject to change based on the results of the noise peer review comments.	We understand noise related matters have been satisfied, with any required additional analysis implemented through an appropriately worded condition of approval.
Region of Waterloo	
Hydrogeology and Water Program (HWP)	Response
Regional Staff require the developer to enter into an agreement to complete a Salt Management Plan to the satisfaction of the Region at Site Plan control. A Slat Management Plan will be required for any area containing eight (8) or more parking spaces and/pr 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	This can be implemented through an appropriately worded condition of approval.

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 previous (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. picked sand) in favour of road salt.	
The proponent is eligible for certification under 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://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.	Noted
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	Noted
Draft Plan of Subdivision Conditions	Response
The Region has no objections to draft approval of Plan of Subdivision 30T-23401, subject to the inclusion of the following conditions of Draft Approval set out below.	Noted – no concerns with the Region’s proposed conditions
1. That this approval applies to Plan of Subdivision 30T-23401 for Activa Holdings Inc. in the City of Waterloo, File No.: 8784CX by MHBC dated September 3, 2024 which shows the following:	

Stage 1 Blocks 1, 2, 4, 7-9, 13 Blocks 3, 5, 6, 10-12 Block 14 Block 15 Block 16 Block 17 Blocks 18-21 Residential – Single Detached (61-77 units) Residential – Street Townhouses (54-74 units) Multiple Residential (32 units) Stormwater Management Block Open Space Walkway 0.3m Reserve Stage 2 Blocks 1-3 Block 4 Block 5 Block 6 Blocks 7-9 Multiple Residential (202-208 units) Commercial Park Open Space 0.3m Reserve Stage 3 Block 1 Block 2 Block 3 Residential – Street Townhouses (6-9 units) Multiple Residential (20-26 units) Open Space Stage 4 Block 1 Block 2 Multiple Residential (208 units) 0.3m Reserve Roads Street One, Street Two and Street Three Total Units: 583-634 residential units	
2. That prior to final approval, the Owner/Developer agrees to stage the development of this plan of subdivision in a manner satisfactory to the City of Waterloo and the Regional Municipality of Waterloo	
3. That prior to final approval, the streets be named to the satisfaction of the City of Waterloo and the Regional Municipality of Waterloo	
4. That prior to final approval, the subdivision agreement be registered by the City of Waterloo against the land to which it applies and a copy of the registered agreement be forwarded to the Regional Municipality of Waterloo prior to final approval of the subdivision plan	
5. That prior to final approval, the Owner/Developer enter into a registered development agreement with the Regional Municipality of the Waterloo requiring that the Owner/Developer complete, prior to Sit Plan Approval, a Salt Management Plan for Stage 1 Block 14; Stage 2 Block 1, 2, 3 and 4; Stage 3 Block 2; Stage 4 Block 1, to the satisfaction of the Regional Municipality of Waterloo.	
6. a) That prior to final approval, the Owner/Developer enters into an Agreement for Servicing with the Regional Municipality of Waterloo to preserve access to municipal water supply and municipal wastewater treatment services prior to final	

approval or any agreement for the installation of underground servicing with the area municipality, such agreement shall be amended to provide a Regional Agreement for Servicing prior to registration of any part of the plan. The Regional Commissioner of Engineering and Environmental Services shall advise prior to an Agreement for Servicing that sufficient water supplies and wastewater treatment capacity is available for this plan, or the portion of the plan to be registered. b) That the Owner/Developer include the following statement in all agreements of lease or purchase and sale that may be entered into pursuant to Section 52 of the Planning Act, prior to the registration of this plan: <i>"The block or blocks which are the subject of this agreement of lease or purchase and sale are not yet registered as a plan of subdivision. The fulfillment of all conditions of draft plan approval, including the commitment of water supply and sewage treatment services thereto by the Region and other authorities, has not yet been completed to permit registration of the plan. Accordingly, the purchaser should be aware that the vendor is making no representation or warranty that the block or blocks which are the subject of this agreement of lease or purchase and sale will have all conditions of draft plan approval satisfied, including the availability of servicing, until till the plan is registered."</i>	
Grand River Conservation Authority	
We would ask for additions discussion to confirm that the expected 152m3/year (7%) increase in runoff to the southwest wetland will not negatively impact the vegetation community. This response can be provided directly by email, and included in a revised EIS prior to draft plan clearance.	
Waterloo Catholic District School Board	
Student Accommodation	Response

A) That any Education Development Charges shall be collected prior to the issuance of a building permit(s).	Noted
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/).	This can be implemented through an appropriately worded condition of approval
c) That the developer shall include the following wording in the subdivision agreement to advise all purchases of residential units and/or renters of same: <i>"in order to limit risks, public school buses contracted by Student Transportation Services of Waterloo Region (STSWR), or its assigned or successors, will not travel on privately owned or maintained rights-of-way 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."</i>	This can be implemented through an appropriately worded condition of approval
Bell Canada	
Bell Canada Condition(s) of Approval	Response
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 agrees and acknowledges to convey such easements at no cost to Bell Canada.	Noted
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.	Noted
Upon receipt of this comment letter, the Owner is to provide Bell Canada with servicing plans/CUP at their earliest convenience to	This can be dealt with through detailed design

planninganddevelopment@bell.ca to confirm the provision of communication/telecommunication infrastructure needed to service the development.	
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.	This can be dealt with through detailed design
If the Owner elects not to pay for the above noted connection, Bell Canada may decide not to provide service to this development.	Noted

Additional Planning Analysis Requested by City Staff

Provincial Planning Statement

The 2024 Provincial Planning Statement (PPS) replaced the Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe. The PPS came into force and effect on October 20, 2024. The PPS provides policy direction on matters of provincial interest related to land use planning and development. As a key part of Ontario's policy-led planning system, the PPS sets the policy foundation for regulating the development and use of land province-wide, helping achieve the provincial goal of meeting the needs of a fast-growing province while enhancing the quality of life for all Ontarians.

Chapter 2 of the PPS includes policies related to building homes and sustaining strong and competitive communities. Section 2.2.1 requires that planning authorities provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

- a. (subsection c) – promoting densities for new housing which efficiently use land, resources, infrastructure and public facilities, and support the use of active transportation; and
- b. (subsection d) – requiring the transit supportive development and prioritizing intensification, including potential air rights, in proximity to transit, including corridors and stations

The proposed development provides for a wide range of housing choice, and efficiently uses existing infrastructure, including Millennium Blvd and the infrastructure installed when the Carriage Crossing community was constructed. Furthermore, Millennium Blvd contains an existing multi-use pathway readily accessible by the future residents. This pathway provides connections throughout RIM Park, the City's premier indoor and outdoor recreation facility. Millennium Blvd provides a direct connection to University Avenue, which also includes active transportation infrastructure.

Subsection 2.3.1.2 states that land use patterns within settlement areas should be based on densities and a mix of land uses which:

- a. Efficiently use land and resources
- b. Optimize existing and planned infrastructure and public service facilities

- c. Support active transportation
- d. Are transit-supportive, as appropriate; and
- e. Are freight supportive

The subject lands efficiently use land and optimize existing infrastructure, as noted above. Furthermore, the Proposed Development supports active transportation by providing connections to existing pedestrian and cycling infrastructure on Millennium Blvd and throughout RIM Park. Should the City construct a multi-use pathway along Country Squire Road, connections within the development to this new pathway can be provided.

Subsection 3.6.2 states that municipal sewage and municipal water services are the preferred form of servicing for settlement areas. The subject lands will be serviced with municipal water and sanitary sewage services.

Section 3.9 refers to public spaces, recreation, parks, trails and open space. More specifically, healthy, active and inclusive communities should be promoted by planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages. The policy is not intended to be fully achieved on each individual development.

The Subject Lands contribute to a healthy and active community by augmenting the substantial amount of public open space in the immediate area through the inclusion of a new public park and pathway around a new municipal stormwater management facility.

The subject lands were previously removed from the Regional Employment Area through ROPA 6.

In my opinion, the Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision are consistent with the PPS.

City Official Plan Policy 10.3.1(9)

This policy states that:

Where an employment land conversion occurs through the municipal comprehensive review, initiated by the Region, the implementing Official Plan framework to facilitate the conversion will include:

- (a) appropriate minimum employment densities required to be developed in conjunction with non-employment uses;
- (b) built form requirements, including requirements for developments to feature mixed-use buildings;
- (c) the permitted heights and densities;
- (d) requirements to ensure that any new sensitive uses are appropriately phased based on the surrounding land use context. Permission for sensitive uses may require the application of holding provisions

The following provides responses to each of the subsections of the policy:

- a) The lands are located in a residential area and in proximity to the City's largest indoor/outdoor recreation facility. Commercial uses are proposed within the development to support the increase in residential population. In my opinion imposing a minimum amount of employment

floor area in this context would not contribute positively to the development. The policy acknowledges that some areas may require minimum employment densities and others may not through the use of the term 'appropriate.' In this instance, no minimum is appropriate.

- b) The Zoning By-law includes built form regulations for the portion of the development planned for multi-storey development. These areas, along Millennium Blvd permit mixed-use buildings. In my opinion, it is not appropriate to require mixed-use buildings in this location and in its context.
- c) The Official Plan and Zoning Bylaw regulate density and height.
- d) There are no existing industrial operations in the immediate area. Land use compatibility with regard to the Enova office to the west and the RIM Park building to the south were assessed and it was concluded that the proposed development was compatible with both. A condition can be included with regard to a detailed Stationary Noise Assessment for Block 2/Stage 3, as required.

In my opinion, the Official Plan Amendment, Zoning Bylaw Amendment and Draft Plan of Subdivision satisfy Subsection 10.3.1(9).

Respectfully,



Trevor Hawkins, M.PL, MCIP, RPP

Please find enclosed (digitally) the following:

- 1. One (1) copy of a **Resubmission Letter/Response Matrix addressing** all comments received, including an assessment of the 2024 PPS and Subsection 10.3.1(9) of the City Official Plan.
- 2. One (1) copy of the updated **OPA Schedule B**
- 3. One (1) copy of the updated **proposed OPA amendment, District Plan amendment and Draft Zoning By-law Amendment text**
- 4. One (1) copy of a revised **Draft Plan of Subdivision** (11" by 17")
- 5. One (1) copy of revised **Environmental Impact Study**
- 6. One (1) copy of revised **Engineering Plans**
- 7. One (1) copy of **Right-of-Way Cross Section drawings**

We note:

- No update is required to the min and max unit yields;
- An Easement Plan is a standard condition of approval – it is not necessary to prepare such a Plan prior to draft approval
- An Active Transportation Plan can be provided as a condition of approval, which is also standard. The revised design accommodates a trail within the Open Space buffer Blocks along the west side of the Draft Plan
- A revised Functional Servicing and Stormwater Management Report was not required to address the provided comments

- The owner is not responsible for landscaping an existing public road (Country Squire Rd). As such a Landscape Plan for Country Squire Rd is not provided. Site Plan approval for the adjacent Blocks can explore landscaping within private property at the interface. The individual homeowners for the adjacent single detached dwellings will landscape their rear yards with due consideration to the proposed retaining walls