

No.	Comment	Commentary and Response
Development Engineering (City of Waterloo)		
Sanitary		
1	The City must be satisfied that the downstream sewer network including the section located along the Hydro Corridor and the Laurel Creek Trunk Sanitary Sewer can accommodate discharge from the proposed development. As indicated by Section 6.3 of the Functional Servicing and Stormwater Report (FSSR), the receiving municipal sanitary system cannot accommodate increased flows without surcharging. Please demonstrate a solution that provides adequate capacity in the FSSR prior to draft plan approval. The required upgrades may be made a requirement under the subdivision agreement for which securities may be held.	Please refer to hydraulic modeling presented in section 6.3 of the report. In existing conditions, wet weather surcharging extend to Conestogo Road. Approximately 15 L/s of flow (~700 units) can be accommodated without extending the surcharging further on Conestogo (Block 1 and 2 or Block 3 of revised Draft Plan of Subdivision).
Storm		
2	Per the Functional Servicing Plan (C2-1) and Proposed Plan & Profile (C4-1) drawings, sufficient cover (1.2m) is not achieved in the lower reaches of the storm sewer. Reconfigure storm networks to achieve 1.2m or greater of cover.	Drawings have been revised to achieve cover of 1.2m in most areas. The design will be further refined with accurate pipe sizing during detailed design and cover reevaluated at the time.
Stormwater Management		
3	Include a storm catchment plan for pre- and post-development conditions, including both interim and ultimate conditions within the FSSR.	Refer to Figures 6 and 7 in the revised FSSR.
4	Infiltration is not discussed within the FSSR. The subject lands fall within the Forwell Creek Subwatershed which has a volume control target of 12.5mm across the entire site per Section 5.1 of the Stormwater Volume Criteria and Targets established in the Municipal Class EA Integrated Stormwater Management Master Plan by Aquafor Beech (2021) (SWM-MP). Revise the FSSR to include a strategy for volume control.	A discussion and approach to infiltration is presented in Section 9.6 of revised FSSR
5	Where 12.5mm isn't feasible through capture and retention, the maximum extent possible (MEP) shall be retained and the remaining volume shall be filtered, or project elements should be relocated to account for varying conditions and constraints across the site.	Infiltration volume for the full build out can be provided within the right-of-way.
6	Where feasible, new developments are encouraged to propose clean water collection pipe systems within the municipal road right of way designed to infiltrate clean runoff from roof and landscaped areas.	A clean water collection pipe has been replaced with a linear infiltration gallery.
7	Show the proposed OGS location on the Functional Servicing Plan.	OGS locations have been identified on revised Functional Servicing Plan
8	Show how runoff from the central park/ rooftops will be discharged downstream of the OGS unit per section 9.5 of the FSSR.	Connected to Clean Water Infiltration system
9	Note that per Section 5.2 of the Stormwater Volume Criteria and Targets in the SWM-MP, the site must target Enhanced-Level 1 protection which equates to the reduction of average long-term annual load of suspended sediment by 80% or greater. Revise FSSR to accommodate this requirement.	Please refer to update in Section 9.5 of revised FSSR
10	Treatment methods for reaching the minimum water quality targets for the Forwell Creek Subwatershed as described within the Laurel Creek Watershed Study by the GRCA (1993) should be demonstrated at a minimum to a conceptual level within the FSSR. Monitored proof of these targets may be included as term(s) within the subdivision agreement. These targets include: - May 1 – October 31 instream temperature: <29 deg.C. - June 1 – August 1 instream temperature: <26 deg.C - Instream E. coli: <200 counts/100mL - Instream DO: > 6mg/L - Instream phosphorus: 0.05-0.08 mg/L - BMPs remove 90% phosphorus - Storage discharge: <25 mg/L suspended solids (event mean concentrations and flow proportional sampling)	Refer to Section 9.5 of revised FSSR for discussion on water quality and how the parameters within the LCWS study have been addressed.
Right of Way		

11	The suggested road right of way deviates from the City's standard cross section. Kindly refer to Standard Drawing CW-201 in the City's Standard Drawing package available at: https://www.waterloo.ca/en/government/development-engineering-manual.aspx/ . Please modify the section to conform to CW-201. In rare instances where a component of CW-201 cannot be accommodated due to factors clearly specify and justify why a deviation should be considered. If alternative configurations for utilities are proposed, please include correspondence showing agreement by the third party agencies with the proposed deviations from.	Updated 18 metres right of way submitted to the City on September 19, 2023
12	Please Refer to Table V4-2 in Volume 4 of the CELM for Minimum Pavement Design Requirements. Local roads require 60mm HL8 Asphalt or 90mm HL8 Asphalt for staged construction, and 40mm HL3 Asphalt (surface).	Pavement thicknesses have been updated to minimum city standards.
Staging		
13	Include pre- and post-development peak stormwater discharge rates for the interim condition in Section 9.4 of the FSSR.	Interim conditions have been added to Table VII in the report.
14	Provide a schematic and explanation of the operation of the OGS unit during the interim condition and how the water quality objectives will be met.	A note has been added regarding an OGS prior to discharge to the outlet. The OGS will be removed as part of the next phase of development.
15	Please provide a section showing the interim storm outlet to ensure adequate cover will be provided.	Please refer to revised Servicing Plan and Profile (Drawing C4-1)
16	Please revise the Functional Servicing Plan to show a hydrant at the end of the Phase 1 boundary, in place of the proposed blow-off.	Please refer to revised Functional Servicing Plan
Transportation Services (City of Waterloo)		
Proposed Internal Roadway		
17	The City of Waterloo requires a minimum right-of-way width of 18 metres as per City Standards for the following reasons: - The sidewalk must be a minimum of 1.8 metres for accessibility. Due to the land use, we recommend a 2.1 metre sidewalk. - The lane widths should be a minimum of 3.5 metres for the function of this road to allow for service, delivery and bus (school) vehicles. - A minimum of 3.0 metres should be accommodated for on-street parking. We recommend that the parking be accommodated along the outside of the proposed road to permit deliveries, drop off, pick up and other curbside management uses. - A minimum boulevard width of 4.5 metres is required to accommodate a 1.8 metre wide sidewalk and hydro vaults/transformers including their required grounding grid. Confirmation with Enova Power Corp. is required for all new hydro installations. - A minimum of 1.0 metre boulevard must be provided on the inside of the proposed roadway (if the MUP is not within the right-of-way). - Road Design must conform to the Development Engineering Manual, standard drawing CW-201 as recently approved by Council. - Gas Utilities requires a 2.0 metre easement between the City property line and the building face.	Updated 18 metres right of way submitted to the City on September 19, 2023, including provisions for sidewalks/trails and on-street parking
18	The radius of the curves on the internal roadway must accommodate a City of Waterloo Fire Services vehicle. A turning template using a design vehicle of SU-9 should be used to confirm.	Updated 18 metres right of way submitted to the City on September 19, 2023, including updated radius of curves; Updated right of way included as part of revised draft plan of subdivision
19	The proposed MUP on the inside of the proposed roadway does not appear to connect to Conestogo Road. The City requires the MUP to connect to our existing active transportation network, therefore we request that the MUP be within the City of Waterloo right-of-way. This will also ensure that any maintenance will be to City standards.	Updated 18 metres right of way submitted to the City on September 19, 2023, including provisions for sidewalks/trails and on-street parking
Conestogo Road		
20	The Official Plan designates Conestogo Road between Northfield Drive and Dotzert Court as 20 metres, 23 metres with warranted improvements. The left turn lane on Conestogo Road at Northfield Drive and turn lanes into the site can be accommodated within the existing right-of-way width. As such the City will not require a road widening. The current right-of-way width is approximately 21 metres.	Noted
21	Road improvements identified in the TIS along Conestogo Road will be at the cost of the developer.	Noted; To be addressed as a condition of draft approval, based on recommendations provide by Paradigm Transportation Solutions.
Lighting		
22	Developers are also required to pay a one-time fee for future maintenance or replacement of lighting. This fee will be paid to the City of Waterloo prior to assuming the road. This amount will be calculated at 10% of the development lighting cost (i.e., Poles, fixtures and required lighting infrastructure) or a minimum of \$30,000.	Noted; To be addressed as a condition of draft approval
23	The City will be responsible for 100% of the maintenance costs for street lighting within the right-of-way once all conditions are cleared and the road has been assumed.	Noted; To be addressed as a condition of draft approval

Waterloo Region District School Board		
24	The Waterloo Region District School Board (WRDSB) has reviewed the resubmission of the above-noted application that proposes the development of a maximum of 3980 residential units, increased from the previous proposal of 2534 residential units. The WRDSB's previously provided comments on July 13, 2021, these comments continue to apply and The WRDSB has no additional comments to provide at this time.	Updated submission to be provided to WRDSB under separate cover; City to be copied on future submission
Waterloo Catholic District School Board		
25	The WCDSB's previous comment letter sent in July 2021 continue to apply to this resubmission, as the updated information does not address the Board's concerns regarding the pick-up and drop off of students, or the lack of pedestrian connectivity beyond the subject property. The proposed development remains disconnected from a fully urban road network complete with sidewalks, which would support active transportation for walk-eligible students. Notably, there is no pedestrian infrastructure until Bauer Place.	Updated submission to be provided to WCDSB under separate cover; City to be copied on future submission
26	The following standard conditions are provided and the Board reserves the right to provide additional conditions subject to further exploration of its interests as conveyed herein. • That Education Development Charges shall be collected prior to the issuance of a building permit(s). • 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 permanent development sign advising prospective residents about schools in the area. • That the developer shall agree in the subdivision agreement to advise all purchasers of residential units and/or renters of same, by inserting the following clause in all offers of Purchase and Sale/Lease: <i>"In order 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."</i>	Noted; To be addressed as a condition of draft approval
Canada Post		
27	Canada Post has reviewed the proposal for the above noted Development Application and has determined that the project adheres to the multi-unit policy and will be serviced by developer/owner installed Lock Box Assembly. <i>Multi-unit buildings and complexes (residential and commercial) with a common lobby, common indoor or sheltered space, require a centralized lock box assembly which is to be provided by, installed by, and maintained by the developer/owner at the owner's expense.</i> Buildings with 100 units or more MUST have a rear loading Lock Box Assembly with dedicated secure mail room. Should the description of the project change, please provide an updated plan in order for us to assess the impact of the change on mail service.	Noted; To be addressed as a condition of draft approval
Grand River Conservation Authority		
28	Region staff advise that Grand River Conservation Authority (GRCA) comments will be provided under separate cover after the required fees have been submitted to the GRCA.	GRCA comments provided on June 9, 2023, recommending draft plan approval with the following conditions: 1. Prior to any grading or construction on the site and prior to the registration of the plan, the Owners or their agents submit the following plans and reports to the satisfaction of the Grand River Conservation Authority: a. A detailed stormwater management report in accordance with the 2003 Ministry of the Environment Report entitled "Stormwater Management Planning and Design Manual" b. A detailed lot grading, servicing and storm drainage plan c. An erosion and siltation control plan in accordance with the Grand River Conservation Authority's Guidelines for sediment and erosion control, indicating the means whereby erosion will be minimized and silt maintained on-site throughout all phases of grading and construction

		d. The submission and approval of a Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Permit from the Grand River Conservation Authority prior to the construction of a wetland and/or grading in a regulated area and/or construction of the stormwater management outlet in a regulated area
Enova Power		
29	Enova Power requests that as a next step, the Developer submit a site plan showing proposed locations for the Enova transformers and the duct bank easements.	Noted; To be addressed as a condition of draft approval
Ministry of Transportation Ontario (MTO)		
525 & 565 Conestogo Road		
30	MTO has requested that the City of Waterloo undertake a Comprehensive TIS in this area. This development would be included in the requested comprehensive TIS. MTO and the City are working out the exact details and requirements of this study.	Additional commentary provided by Paradigm Transportation Solutions confirms proposed development will have no impact on King Street and Highway 85 interchange
31	The subject property is located adjacent to Highway 85, within MTO's Permit Control Area (PCA), and as such, MTO permits are required before any demolition, grading, construction or alteration to the site commences	Noted; To be addressed as a condition of draft approval
32	Highway 85 at this location is classified as a 1A Freeway in MTO's Access Management Classification System. As such, all requirements, guidelines and best practices in accordance with this classification shall apply.	Noted; To be addressed as a condition of draft approval
Multi-Use Pedestrian Structure		
33	Although the intent of this new multi-use facility is to provide a more direct connection to the Northfield LRT Station, the current sidewalks and cycle lanes at the Highway 85/Northfield Road interchange provides the same connectivity for the Northfield Properties Development with minimal out of way travel. As a result, the ministry does not support the construction of this multi-use facility structure	Future pedestrian connection over Highway 85 does not impact proposed development and associated OPA, ZBA and Draft Plan of Subdivision; Continued discussions to be pursued with MTO separate from current OPA, ZBA ad Draft Plan of Subdivision process
Stormwater Management Report		
34	The SWM design uses the existing site drainage outlets, which direct runoff to the MTO ditch on the east side of Highway 85 out letting to Forwell Creek approximately 300 m downstream. The general SWM plan for the site is acceptable.	Noted; To be addressed as a condition of draft approval
35	The MTO does not recognize any benefit from attenuation of stormwater runoff using parking lot storage where the control is achieved through an 'orifice plate' devices. MTO does not accept orifice plates as a method of control as the continued functionality of such a control device cannot be guaranteed. MTO will consider an alternate form of control device (e.g. a short segment of storm sewer, equal in diameter of the required orifice, that leads from a manhole to the storm sewer system).	This comment is a carry over from when parking lot storage was proposed on the south side of the hydro corridor. This parcel has been removed from the application and no parking lot storage is proposed any more. This comment is deemed to be not applicable.
36	It should be demonstrated that the failure of a storage facility will not result in any damage to the Highway Drainage System. The proponent should include a detail of the alternative control device with their next submission.	This comment is a carry over from when parking lot storage was proposed on the south side of the hydro corridor. This parcel has been removed from the application and no parking lot storage is proposed any more. This comment is deemed to be not applicable.
37	The MTO will not provide an approval that will contravene the mandate of other regulatory agencies. As a result, the proponent must obtain approval from all other jurisdictional agencies.	Noted
Traffic Impact Study		
38	Comments on the TIS and "TIS Addendum from Paradigm" are not yet available from MTO's Traffic Office, however they will be provided as soon as they are made available.	Noted
Draft Plan of Subdivision		
39	Prior to final approval the owner shall submit to MTO for review and approval, a copy of the Stormwater Management Report/Plan	Noted; To be addressed as a condition of draft approval
40	That prior to final approval, the owner shall submit to MTO for review and approval, a copy of a Traffic Impact Study. Highway improvements as a result of the development are the financial responsibility of the developer.	Noted; To be addressed as a condition of draft approval
41	An MTO Building and Land Use Permit is required. As a condition of MTO permits, the following will be required: The Proponent shall submit an acceptable Site Plan, Grading Plans, Drainage Plan and Site Servicing Plan for MTO review and approval. These plans shall clearly identify all structures/works and parking (existing and proposed).	Noted; To be addressed as a condition of draft approval

	- MTO requires all buildings, structures and features integral to the site to be located a minimum of 14 metres from the highway property limit, inclusive of landscaping features, fire-lanes, parking and storm water management facilities. - MTO notes the proposed Trail / Dog run is proposed within the 14m setback. MTO may permit this item so long as no permanent structures are located in this area, and that the Trail / Dog run is not an integral/required component of the development.	
42	The grading/drainage plans shall identify any storm drain infrastructure including - outlets, swales, tiles, direction of flow, etc.	Noted
43	No access will be permitted to Northfield Drive or Highway 85 from the subject site.	Noted
44	Proposed grading and earth works shall not extend onto MTO owned lands.	Noted
45	The property owners are required to erect a security fence along MTO's property limits, extending along the entire east and south boundaries of the subject lands. The security fence shall be a minimum of 1.8 metres in height, shall be offset a minimum 0.3 metres away from the existing designated highway property limit, and shall be clearly identified on all plans.	Noted
46	Any/all signage visible from Highway 85, including temporary development signs, must be identified on the plans, must conform to MTO policies and guidelines, and will require a valid MTO Sign Permit before installation.	Noted
General Comment		
47	MTO would appreciate receiving a copy of the decision on these applications as well as a copy of the conditions of Draft Approval for our records.	Noted
48	The Minister of Municipal Affairs and Housing approved Regional Official Plan Amendment No. 6 (ROPA 6) with amendments on April 11, 2023. ROPA 6 did NOT identify the subject lands that are north of the hydro corridor as part of the Region's employment area, as shown on Modified Map 3 of the Minister's decision. The hydro corridor and the lands south of the hydro corridor have been designated as Regional Employment Area on Modified Map 3 of the Region Official Plan. Region staff note that the draft plan has been revised to exclude the lands south of the hydro corridor from the current applications, as previously requested.	Noted
49	In general, the proposed development conforms to the ROP policy for MTSAs. Region staff reiterate that as part of these development applications, it will be important to provide/enhance pedestrian connections from these lands to the Northfield ION Station if possible, and more importantly to the Conestoga ION Station. Regional staff are of the opinion that there are still unresolved issues with pedestrian connectivity to either ION Station that will need to be addressed through a subsequent submission.	Future pedestrian connection over Highway 85 does not impact proposed development and associated OPA, ZBA and Draft Plan of Subdivision; Continued discussions to be pursued with MTO separate from current OPA, ZBA ad Draft Plan of Subdivision process
50	Region staff understand that the applicant has decided to re-design the draft plan of subdivision to include a municipal road that would provide the proposed blocks with municipal road frontage, access and servicing and have no further concerns with respect to the creation of landlocked Blocks without frontage on or access to a municipal road or without any established legal access to a municipal road or services.	Draft plan of subdivision revised to include 18.0 metre right of way, and frontage for all blocks
51	Region staff request clarification on what the dashed line across Block 3 is.	Draft plan of subdivision revised to address comment
52	Region staff confirm that the previously labelled Block 10 Road widening has been removed from the draft plan as requested. Region staff reiterate that some type of road widening may be required along Conestoga Road up to Northfield Drive to facilitate any intersection improvements as recommended in the TIS, once the TIS has been approved by the City/Region. Once determined, any required road widening will need to be identified on the draft plan.	Draft plan of subdivision revised to address comment
53	Region staff understand that the hydro corridor block, which forms part of the Regional Employment Area, has been included in the Draft Plan of Subdivision for the sole purpose of the City imposing a condition that indicates that the Owner will continue to work collaboratively with the Region and City in pursuit of Ministry of Transportation ("MTO") approvals. Region staff confirm that the hydro corridor has been excluded from the submitted OPA and ZBA Schedules, and is no longer shown as an Open Space Zone, nor shown to be used for parking/ landscaping. Region staff reiterate that the hydro corridor lands are to be maintained as employment lands in accordance with Region Official Plan policies and the Regional Employment Area land use designation.	Noted; Hydro corridor lands remain included as part of draft plan of subdivision but not subject to OPA or ZBA at this time
54	Region staff confirm that the Draft Plan of Subdivision has been revised to identify the existing Waterloo North Hydro easement (Block 1) and have no further comment in this regard.	Noted
55	Region staff recommend that the City and applicant confirm that one temporary turning circle as shown on the draft plan to serve Stage A, would provide sufficient vehicular access in and out of the subdivision for the number of units proposed in Stage A. Is an emergency access proposed?	Noted; To be addressed as a condition of draft approval
Stationary Noise Study		
56	Region staff advise that comments regarding Stationary Noise and a response to the Noise Study Addendum will be provided under separate cover.	Awaiting comments from the Region

Record of Site Condition		
57	Region staff received an RSC and Ministry acknowledgement letter from the applicant on May 24, 2023. Region staff confirm that the majority of the lands were covered by the filed RSC. Region staff confirm that a portion of the lands on block 1 and 3, at the northeasterly corner of the property (at Northfield and Conestogo) were not included in the RSC. Region understand that the small portion of lands remaining are currently undergoing assessment, and staff would support a holding provision that would prohibit the proposed development until submission of the RSC is acknowledged by the Ministry.	Acknowledgment letter has been received from the MECP regarding filing of the RSC for the majority of the lands. We are awaiting a similar confirmation from the MECP for a small portion of the site (northeast corner at Northfield Drive and Conestogo Road) subject to a risk assessment and awaiting same. Confirmation is expected shortly.
Hydrogeology and Water Programs		
58	Region staff advise that as a condition of draft plan approval, the Owner/Developer will be required to enter into a Development Agreement with the Region / City to complete a Salt Management Plan (SMP) as part of a future Site Plan application for each block within the draft plan.	Noted; To be addressed as a condition of draft approval
Water Services		
59	Region staff have no concerns and offer no comments on the resubmission.	Noted
Housing Services		
60	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.	Noted
61	Staff continue to 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.	Noted
62	In order for an owned unit to be deemed affordable, the maximum affordable house price is \$385,500.	Noted
63	In order for a rental unit to be deemed affordable, the average rent for the proposed units which have fewer than 3 bedrooms must be at or below the average market rent in the regional market area as shown above. For proposed units with three or more bedrooms, the average rent for the units must be below \$1,470.	Noted
64	Region staff advise that the Traffic Impact Study Addendum only recommends improvements to Municipal Roads, and as such, Region staff have no comments.	Noted
65	Region staff reiterate that should the final TIS recommend any additional road improvements on Northfield Drive West, a functional design, cost estimate, letter of credit/certified cheque along with a signed agreement for the road works may be required. Any work within the Regional road allowance will be required to be completed under a Regional Road contract. Region staff understand that no improvements to Northfield Drive West are currently proposed.	Noted
66	Region staff advise that comments regarding environmental noise and the submitted noise study addendum will be provided under separate cover.	
67	The Owner/Developer should be advised that receipt of these preliminary post circulation comments does not constitute a draft or final approval of this application. Region staff will provide comments on the submitted noise study addendum under separate cover. Prior to draft approval by the Region, the Owner/Developer must satisfactorily address the above noted agency and Regional comments, as well as the City of Waterloo comments. Further, the City of Waterloo must provide a recommendation in support of draft plan approval, including the City's conditions of draft approval. The proposed OPA and ZBA must be approved and the By-law be in force and effect prior to the Region issuing draft plan approval for the proposed plan of subdivision.	Noted
68	Further, prior to draft approval, the Owner/Developer must submit to the Region 5 copies of the plan to be draft approved. The plan must be signed by the Owner and Surveyor. Once the 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 <i>Planning Act</i> .	Noted
69	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.	Noted