Comment Tracking Table – April 2025 Draft Plan Resubmission
Meritech Engineering Responses Only
556, 560, and 576 Conservation Drive

Planning		
No.	Comment	Response
Official Plan		
1	The subject lands are designated “Low Density Residential” and “Open Space” on Schedule ‘A’ of the Official Plan. A minor node is identified at the intersection of Beaver Creek Road and Conservation Drive. The low-density residential designation allows for consideration of a range of low-rise buildings as well as community uses such as public schools and open spaces. The maximum density of any one site shall not exceed 150 bedrooms per hectare and the maximum height of building shall not exceed 10 metres.	To be addressed by others.
SPA 37		
2	The subject lands are designated “Low Density Residential” and “Open Space” on Schedule ‘A’ of the Official Plan. A minor node is identified at the intersection of Beaver Creek Road and Conservation Drive. The low-density residential designation allows for consideration of a range of low-rise buildings as well as community uses such as public schools and open spaces. The maximum density of any one site shall not exceed 150 bedrooms per hectare and the maximum height of building shall not exceed 10 metres.	To be addressed by others.
3	Planning staff previously noted that the Blocks identified as 27 and 28 form part of the BCM node. Development within these blocks is permitted to be as tall as 20 metres and are permitted to have a density of up to 300 bedrooms per hectare.	To be addressed by others.
4	SPA 37 encourages a mixture of uses. The current version of the draft plan continues to not identify any non-residential uses as permitted uses for the BCM node area. Previous drafts had proposed zoning that allowed for some live/work units. While this development form does not appear to be proposed currently, Planning staff continue to support the potential for a wider range of non-residential uses, as well as slightly larger scale built-forms, consistent with the	To be addressed by others.

	BCM Plan and SPA 37. Zoning for the subject lands should be consistent with proposed zoning for other parts of the BCM District Plan area, which also forms part of the BCM node.	
Updated Official Plan		
5	In December 2024, City Council approved updates to various portions of the Official Plan including policies and land use schedules. The land use for the subject lands remains unchanged from the existing framework. Changes that affect the subject lands are administrative in nature. The existing “Low Density Residential” designation has been changed to “Low Rise Residential”. This change in name will not affect the permitted uses for the subject lands.	To be addressed by others.
6	The proposed development includes a Park Block as part of the draft plan. Should this development be approved, the Land Use schedule (A1) and the Open Space Schedule (A3) of the Official Plan will be subsequently updated (by the City) to show the park block in later phases of the Official Plan Review.	To be addressed by others.
7	The existing Specific Provision Areas 37 (SPA 37) and Specific Provision Area 62 (SPA 62), pertaining to density, remain in the updated Official Plan. These and all SPAs have been renamed to Area Specific Policies (ASPs).	To be addressed by others.
Beaver Creek Meadows District Plan		
8	Overall, this current resubmission is similar to previous resubmitted drafts that have already addressed the majority of the comments in earlier versions of the draft Plan of Subdivision. In general, the layout of the site is consistent with the intent of Beaver Creek Meadows District (BCM) District Plan. The submitted information provided additional detail related to planned densities. As previously noted for the node area, a slightly larger scale multiple residential built form and mixed uses are encouraged. A high standard of design should be maintained to ensure the overall vison of the Beaver Creek Meadows District Plan is achieved.	To be addressed by others.
9	The subject lands are within the Council-adopted Beaver Creek Meadows (BCM) District Plan area. The District Plan was developed through a public planning process, which refined the land use direction outlined within the Official Plan. The proposed development lands within the District Plan area are designated as ‘Low Density 1’, ‘Low Density 2’, ‘Elementary School’, ‘Mixed-Use Medium Density Residential’, and ‘Stormwater Management Facility’ in the	To be addressed by others.

	District Plan. The lands designated as 'Mixed-Use Medium Density Residential' also form part of the Mixed-Use Node.	
Mixed-Use Node		
10	The current submitted subdivision plan still does not appear to provide for non-residential uses for Blocks 26, 27 and 28, located within the mixed-use node area, which are identified on Maps 2 and 3 of the District Plan. Policy 3.4.14 of the District Plan outlines the range of commercial uses that are permitted and encouraged for the node area. Planning staff previously recommend that consideration for limited commercial uses as well as allowing for live-work style units as per policy 3.4.13 of the District Plan should be added to the zoning permissions where appropriate within the node area. The inclusion of limited commercial uses and/or live-work units, well integrated with residential uses within the node, was an important component of the overall vision and structure of the BCM District Plan.	To be addressed by others.
11	The BCM plan further directs that there should be a range of uses within the node area and that a high degree of pedestrian orientation is required.	To be addressed by others.
12	Live-work and commercial uses are encouraged along street facing frontages in particular. Planning staff continue to encourage updated proposed zoning for the node area to allow for opportunities for commercial uses and live-work units.	To be addressed by others.
13	As previously noted, Policy 3.6.2 of the District Plan encourages planning for a range of residential uses and a broad income and social mix. Further, the proposed development should be consistent with policies 3.6.3 and 3.6.4, which requires a high-quality urban design as well as visually interesting spaces that consider pedestrian movement and streetscapes.	To be addressed by others.
Neighbourhood Park		
14	The location of the proposed park remains consistent with the District Plan.	To be addressed by others.
Block layout, land use and density		
15	Planning staff continue to support the proposed land use and block layout as it is consistent with the BCM Plan. Staff maintain that coordination be continued with the lands to the east, which also forms part of the node, and will likely be developed concurrently with this proposed development.	To be addressed by others.

16	The density of the Mixed-Use Medium Density Residential uses within the node should be in the range of 60-100 units per hectare as per policy 3.4.11 of the District Plan.	To be addressed by others.
17	It is noted that the proponent has submitted an updated density and population assessment projections for the subject lands. It appears that the number of units shown on the draft plan of subdivision does not match the number of units noted in Table 1 of the submitted “Supplementary Planning Commentary for Density”. As such, some of the density calculations are likely to be incorrect. The applicant staff should ensure the submitted information is accurate before we can confirm if the density calculations are correct. Generally, the density ranges for various land uses within the subject lands are consistent with the BCM plan, though some blocks located within the node appear to be lower than the proposed density minimum ranges outlined in the BCM District Plan. Planning staff acknowledge that some deviation from the BCM District Plan is expected based on developability of the site.	To be addressed by others.
18	Overall, the proposed development appears to be consistent with overall planned minimum density of 58 people and jobs per hectare required for the entirety of the BCM area. Planning staff will confirm updated densities for the site once the Applicant has submitted updated/corrected unit estimates on the final draft plan of subdivision.	To be addressed by others.
<u>School Block</u>		
19	A school block is provided in the draft plan, consistent with the BCM Plan. Planning staff support the location and size of the school block as it is consistent with policy 3.7.5 b) of the District Plan.	To be addressed by others.
<u>Design considerations</u>		
20	As previously noted, development of the subject lands should be consistent with urban design policies of the District Plan (Section 4 of the District Plan). Generally, the design of the Beaver Creek area should achieve a complete community, high quality design, and a high degree of connectivity, in addition to the urban design considerations for specific uses such as townhouses and single detached buildings. In particular, townhouses should be consistent with policies 3.4.17-19 of the District Plan, which outlines several considerations	To be addressed by others.

	including variety of roof design, variation in elevation and preferred length of townhouse blocks among other matters.	
21	Policies 3.2.10 and 3.2.19 b) discourage back lotting onto municipal streets such as Conservation Drive and Beaver Creek Road.	To be addressed by others.
Traffic Considerations		
22	As previously noted, Planning staff recommend that traffic calming considerations and design measures be integrated into the detailed subdivision design stage to avoid retrofitting the roads once development has already occurred (i.e., adding traffic calming along Esker Lake Dr).	Traffic calming measures will be included in the detailed design.
Proposed Zoning Categories		
23	The proposed zone categories are generally appropriate for the form of development proposed in each block. However, consider how live-work units or ancillary commercial uses could be integrated into Blocks 27 and 28 in accordance with the Beaver Creek node. Note: the RBC zones will be updated to align with recent amendments to the low density residential zones city-wide (re: additional residential units) and will be circulated ASAP.	To be addressed by others.
Applicant Requested Site Specific Zoning Provisions		
24	Various site specific zoning amendment have been requested through application Z-16-14, including reductions to the front/flankage, side, and rear yard setbacks. The latest set of amendments have been revised to reflect previous comments from Planning staff, such as increasing the front yard setback from a minimum of 3.0 metres to a minimum of 5.0 metres. These changes to the application are appreciated and acknowledged.	To be addressed by others.
25	However, some of the amendments that continue to be requested are not supported by Planning staff. In particular, the side yard setback of 0.6 metres on one side each dwelling has significant impact to the function of the lot (i.e., repairs to the side façade, snow storage, access to the rear yard, space for air conditioning units, stairwells for access to additional units in basements, etc.).	To be addressed by others.
26	Rather than addressing each amendment in this letter, please refer to the letter issued by Planning Staff on July 17, 2023 (attached as Appendix C). The opinions in the letter continue to apply and have not changed.	To be addressed by others.

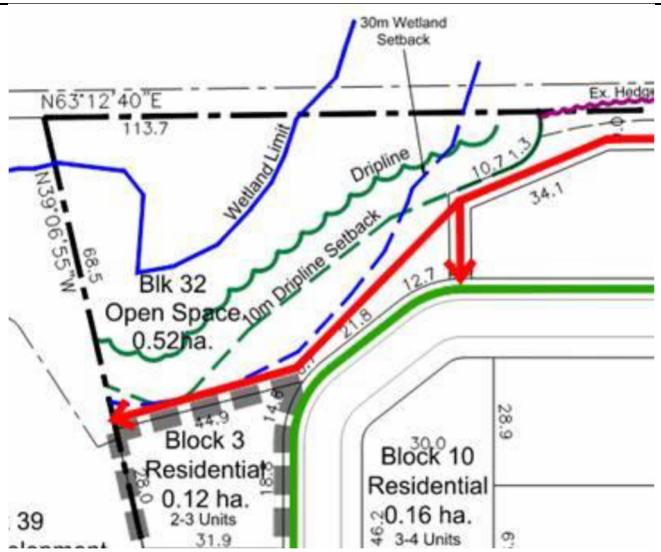
27	Note: Additional site-specific zoning amendments may be required. For example, the Zoning By-law (ZBL) currently limits the number of townhouse units to 6 per row, whereas some of the townhouses in Block 27 and 28 propose 8 units in a row.	To be addressed by others.
Additional Residential Units		
28	On December 9, 2024, City Council approved a general amendment to the Zoning By-law (ZBL) to permit up to four (4) units on residential properties in low density zones. This also included updates to the terminology and regulations for 'additional residential units', coach houses, parking configuration, and building height. You can find more information about this amendment here.	To be addressed by others.
29	However, these changes were not applied to the current versions of the Residential Beaver Creek zones (i.e., RBC2 and RBC3) as they do not currently form part of the ZBL. Planning Staff are reviewing these zones and will make the appropriate changes. Updated versions will be provided to you in the coming weeks.	To be addressed by others.
Lot Depth		
30	A lot depth of 29 metres is proposed for several blocks. Planning Staff do not object to this request.	To be addressed by others.
31	However, please review the depth of Blocks 1, 2, 4, 7, 9, 10, 11, 22, 27 as several of these blocks appear to be less than 29 metres. For example, the western edge of Block 2 tapers to 15 metres which is not adequate for a single detached dwelling.	To be addressed by others.
Draft Plan Layout		
32	The layout of the draft plan is generally acceptable, with the caveat that further review of Stage 2 will be required to ensure adequate access is provided to the adjacent lands.	To be addressed by others.
33	The current layout proposes two driveway accesses (Blocks 39 and 40), rather than extending a municipal road into the lands (i.e., temporary turning circle). This does not provide adequate frontage onto a municipal road for the adjacent lands, and it predetermines that the lands will be developed as a condominium.	To be addressed by others.
34	Further review is required and could include the extension of Pinery Trail or Rideau River St to abut the adjacent lands. This should be discussed with the	To be addressed by others.

	adjacent property owner (or their representatives) to ensure development is not restricted.	
Area Measurements		
35	Please provide at least three (3) decimal places for all area measurements as two decimals is not accurate enough when calculating density, parkland, etc.	To be addressed by others.
Statistics		
36	The Land Use Schedule on the Draft Plan indicates a total of 414-623 units (combined totals for Stage 1 and Stage 2). However, when I add up the unit counts in each block I get a total of 417-618 units. Please confirm the final number of units reflects the sum of each block.	To be addressed by others.
Staging		
37	The staging of the plan is acceptable with the school and park being constructed in the first phase of the development. As noted above, the design of Stage 2 will need to be reconsidered.	To be addressed by others.
Temporary Turning Circle		
38	A temporary turning circle (as shown below) should be added at the east end of Rushing River Street where it connects to Roy Schmidt Road as an easement over either Block 23 or 28, or a combination of both blocks. The easement would be lifted once Roy Schmidt Road is constructed and opened as a public highway. The temporary turning circle will be secured in case the road construction is delayed (due to cost sharing or due to the timing of the adjacent subdivision).	No longer necessary, as this section of street has been eliminated. Coordination with Stantec (Activa's engineer) will continue through to construction to ensure the subdivision designs are coordinated.

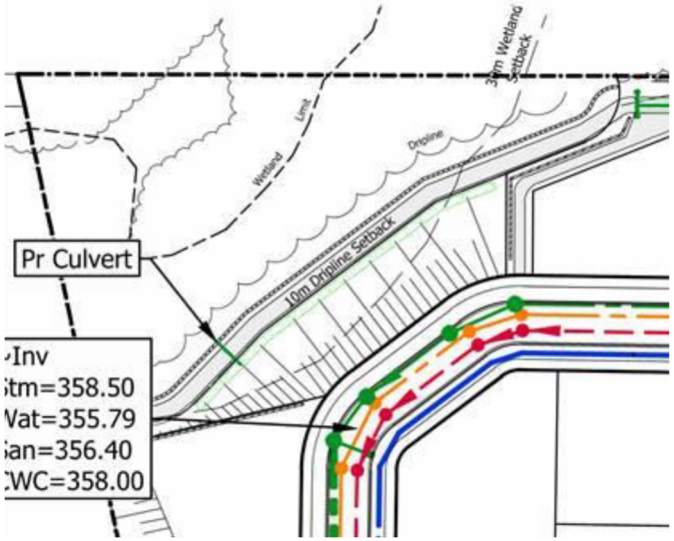
		
Conditions of Draft Plan Approval		
39	Staff are currently finalizing the conditions of draft plan approval and will provide a copy for your review/comment in the coming weeks. These conditions will be provided to City Council for their consideration as part of the final recommendation report.	To be addressed by others.
Block 27		
40	Mixed-Use Medium Density Residential Designation in BCMDP contemplates a minimum building height of 9 metres and a density range of 60 to 100 units per hectare.	To be addressed by others.
41	Confirm if the walk-out townhouses along the west side of the block will achieve the minimum height requirement	To be addressed by others.
42	The concept plan for Block 27 proposes 91 units on a block with an area of 1.71 hectares, or a density of 53.2 units per hectare. Consider redesigning the walk-out townhouses as back-to-back or stacked townhouses in order to achieve the minimum density target (60 units per hectare).	To be addressed by others.
43	The draft plan indicates that Block 27 can accommodate a minimum of 121 units and a maximum of 202, while the concept plan only shows 91 units. Please confirm the density target and the number of units that can realistically be developed.	To be addressed by others.
Block 28		

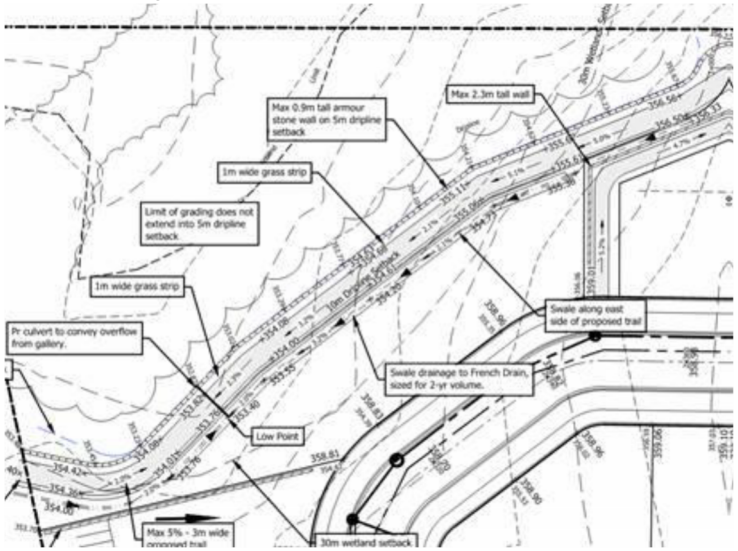
44	As noted above, the BCMDP contemplates a density range of 60 to 100 units per hectare. The concept plan for Block 28 proposes 28 units on a block with an area of 0.66 hectares which equates to a density of 42.4 units per hectare. Please consider how the plan can be redesigned to increase the number of units in the block.	To be addressed by others.
45	The district plan indicates that Block 28 can accommodate a minimum of 39 units and a maximum of 66 units, while the concept plan shows only 28 units. Please confirm the density target and the number of units that can realistically be developed.	To be addressed by others.
<u>Former Structures and Driveway</u>		
46	The structures (houses and a barn) shown in Blocks 21 and 27 can be removed from the draft plan since they have been demolished, along with the former gravel driveway.	To be addressed by others.
<u>Parkland</u>		
47	Parkland Dedication is proposed to be provided as Block 30 on the draft plan which has an approximate area of 1.4094 ha.	To be addressed by others.
48	The Parkland Dedication By-law requires a minimum of 5% of the net land area (gross land area minus land of any environmental features and associated buffers), or approximately 1.191 ha.	To be addressed by others.
49	A sanitary sewer passes through a portion of the park block thereby encumbering the park. The encumbered portion of the park (including the strip of lands west of the sewer will not count towards the parkland dedication. The encumbered land has an area of approximately 0.3176 ha. As such, the portion of land that will be accepted as parkland dedication has a net area of approximately 1.0918 ha. This is deficient by 0.0992 ha and may be provided as cash-in-lieu at the discretion of the City's Commissioner of Integrated Planning and Public Works.	To be addressed by others.
50	Parkland Calculation: Gross Land Area: 28.65 ha Environmental Lands (and buffers): 4.83 ha Net Land Area: 23.82 ha **5% Parkland Required: 1.191 ha** Area of Block 30 (Park): 1.4094 ha	The sanitary "easement" (now referred to as a maintenance access) has been shifted to the west to increase the unencumbered area.

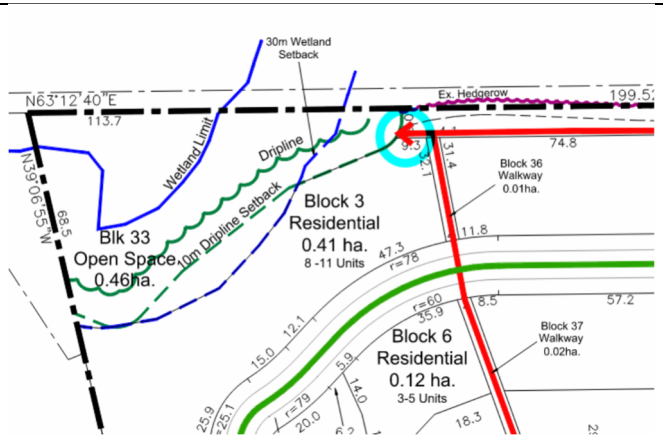
	Encumbered Area of Block 30*: 0.3176 ha **Net Parkland Contribution: 1.0918 ha** Parkland Deficiency: -0.0992 ha * for a sanitary sewer and inadequate lands west of the sewer	Note that the Draft Plan area has been reduced due to the widening along Conservation Drive having been taken; the Draft Plan has been updated to reflect.
Environmental Planning		
51	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 (May 26, 2023) and the natural heritage policies of the Regional Official Plan, in addition to the City's previous comments and Official Plan.	To be addressed by others.
52	The Blocks in the northwest corner of the Draft Plan have been reconfigured such that Block 32, Stage 1 (Open Space) is now slightly larger, abuts the road and only a portion of Block 3, Stage 2 (Residential), and includes a multi-use trail connection. The Active Transportation Plan (last revised November 28, 2024) shows the multi-use trail connection outside of, or on the very edge, of the wetland buffer, and the Comment-Response Table (October 31, 2024) states "Draft plan of subdivision revised adjacent to Open Space Block 32; Pedestrian connection located outside of wetland setback", however, the engineering drawings (October 2024) show the trail, as well as an infiltration gallery and retaining wall, well within the wetland buffer, as shown below. Active Transportation Plan:	All plans have been updated to show the elimination of the trail to the west; infiltration galley; retaining wall. The Draft Plan lotting has been revised to ensure the trail connection to Rideau River Street can be constructed without the need for any retaining walls. As noted, the EIS does not need to be updated.



Preliminary Servicing Plan:



	Trail Grading Details and Cross Section:  A trail in this location was proposed two submissions ago. At that time, through comments issued on March 3, 2023, Environmental Planning staff noted that a trail in this location had not been explicitly contemplated in the EIS and that the EIS would need to be updated to demonstrate that a trail would not reduce the integrity and functionality of the buffer. In response, through the last submission, the trail was removed and Environmental Planning staff noted, through comments provided in 2024, that the Active Transportation Plan still showed a connecting arrow (circled in light blue below), suggesting the trail will continue westward, and requested that the arrow be removed.	

	 Based on this, and the grading challenges that exist with the property to the west, it is unclear why the trail is once again proposed. If the trail, infiltration galley, and retaining wall continue to be proposed and are within the wetland buffer, as shown on the engineering drawings, the EIS needs to be updated to address them. If the trail, infiltration galley, and retaining wall are eliminated, or if the engineering drawings are revised to move them outside the buffer, then the EIS does not need to be updated.	
53	Environmental Planning Staff note that the EIS has not been updated to include the most current Draft Plan or Block numbers. Ideally, these updates would be made. However, if the trail, infiltration gallery, and retaining wall associated with Block 32 (discussed above) are eliminated or it is confirmed that they will be outside of the wetland buffer, and the engineering drawings are updated to reflect this, then the EIS does not need to be updated.	To be addressed by others.
54	Consistent with previous comments, as part of detailed design, a Terms of Reference for the during-construction (Stage II) monitoring program will need to be prepared that specifies/confirms monitoring activities and locations for the surface water, groundwater, and biological aspects of the program. If the landowners in the area continue to combine and share the broader monitoring work for the 'North Waterloo Subwatershed Lands', it is suggested that the broader Terms of Reference be updated as necessary and that a property-specific appendix/attachment be included that addresses the monitoring that will	A TOR for the Stage II (during-construction) stage is currently being prepared by NRSI/Meritech/Stantec for environmental, civil, and hydrogeological considerations. As the Stage II monitoring plan will be a separate document, wording regarding the monitoring will be removed from Meritech's SWM report when it is revised and resubmitted in

	be focused solely on the Cook-Mattamy property (e.g. inlet and outlet of the SWM facility, winter by-pass system, infiltration galleries, etc.). For the post-construction phase (Stage III), the details will be confirmed closer to when 90% buildout will be achieved. Environmental Planning staff note that while the Preliminary Stormwater Management Report (October 2024) states that "to facilitate the transition from Stage I to Stage II, this report should be approved, and considered an addendum to the Terms of Reference that was approved by the agencies for Stage I", the report is not considered a Terms of Reference for the during-construction phase.	support of clearing DP conditions; and a reference added to the stand-alone document.
55	As noted through previous comments and acknowledged by the applicant, the following will need to be included as draft plan conditions and have been included here for consistency and to ensure all relevant/active comments remain easily accessible:	To be addressed by others.
55.1	Approval and implementation of a pre-, during-, and post-construction monitoring program	To be addressed by others.
55.2	Requirement to remove any refuse and/or garbage from the natural heritage features and buffers	Meritech will also add wording to their drawings.
55.3	Approval and implementation of a Landscape Plan that includes: - measures to enhance the habitat and connection of the hedgerow/trail block - clean up/restoration of the historic farm dump - educational signage in the buffer areas - buffer enhancements and plantings	To be addressed by others.
55.4	Approval and implementation of an Invasive Species Management Plan	To be addressed by others.
55.6	Approval and implementation of a Vegetation Management Plan that specifies measures for removal, retention, and replacement using a 2:1 ratio that is coordinated with the design of the SWM facility	A VMP has been prepared and submitted to the City and GRCA in support of a permits. The GRCA had no comments; City comments are outstanding.
55.7	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	Noted in the VMP and drawings prepared by Meritech in support of pre-grading permits.
55.8	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	Already noted in the VMP and drawings prepared by Meritech in support of pre-grading permits.

55.9	Dedication of the environmental lands and their buffers to the City free of charge and without any encumbrances	To be addressed by others.
55.10	Requirement to prepare a standard operating procedures for the opening and closing of the winter bypass valve for the stormwater management facility, with the standard operating procedures considering water quality and quantity data and/or seasonal conditions to optimize the timing of the seasonal valve operations	Will be included in the O&M manual (next comment).
55.11	X.X Stormwater Management Facility (Block 33) a. After construction and prior to assumption of the stormwater management facility in Stage 1 of Draft Plan of Subdivision 30T-16402, the Owner shall prepare an operations maintenance plan for the stormwater management facility, to the satisfaction of the City, the Grand River Conservation Authority (the "GRCA"), and the Ministry of the Environment, Conservation and Parks (the "MECP").	This future requirement will be added to the Final SWM report (to be submitted to clear conditions).
55.12	b. The maintenance plan required in Condition a) shall specify that in-water maintenance work should not be undertaken between May 1 and August 31 to ensure no negative impact to Blanding's Turtle.	Will be included in the O&M manual. In practice, this will force the City to perform maintenance such as cleaning out the forebay in the Fall.
55.13	c. Notwithstanding Condition b), where maintenance work cannot be avoided, wildlife salvage shall be implemented immediately prior to the maintenance work commencing, to the satisfaction of the Ministry of the Environment, Conservation and Parks and the City.	Will be included in the O&M manual.
55.14	X.X Prior to the stripping of topsoil, area grading, land clearing, earthen works, servicing works, infrastructure works, tree removal, and registration, the Owner shall, at its expense, implement the fencing required by the Blanding's Turtle Habitat Mitigation Plan as approved, to the satisfaction of the Ministry of the Environment, Conservation and Parks and the City. The implementation of the Blanding's Turtle Habitat Mitigation Plan shall be coordinated with the City's road reconstruction works.	Already noted on the drawings prepared by Meritech in support of pre-grading permits.
55.15	X.X Further to Standard Subdivision Condition X, the Comprehensive Fencing Plan shall indicate the location of all temporary and permanent fencing, include all applicable details, and include and/or demonstrate: a. 1.5 metre high black vinyl chain-link fencing;	Meritech will be preparing this drawing in support of final approvals.

	b. Turtle barrier fencing required under the Blanding's Turtle Habitat Mitigation Plan; c. Property demarcation posts and living fences; d. Erosion and sediment control fencing; e. Vegetation protection fencing; f. Any retaining walls including indications of height; g. Any other fencing that may be required by the City; and h. Be coordinated between types and extents to avoid redundancies, unnecessary/unintended barriers, parallel/duplicate fencing. This plan shall be coordinated with the Comprehensive Trails Network Plan and the Landscape Plan. The Owner shall, at its expense, design, install, maintain, and monitor the approved Comprehensive Fencing Plan, to the satisfaction of the City.	
55.16	X.X Prior to the removal of any trees on the Lands in accordance with the accepted Vegetation Management Plan, all trees shall be reviewed and assessed for bird nests/potential bat roosting habitat in accordance with the Endangered Species Act and Migratory Birds Convention Act.	To be addressed by others.
<u>Zoning</u>		
Residential Beaver Creek Two (RBC2) Zone		
56	Proposed Amendment: To reduce the minimum Lot Area for Semi-Detached from 450 square metres to 400 square metres. Reply: No objection to the proposed, having regard to the proposed amendments to Lot Frontage and Lot Depth. Likewise, no objection to reduce the minimum Lot Area for Freehold Semi-Detached from 204 to 200 square metres. However, we note that the proposed 200 square metres would prevent a Freehold Semi-Detached from being constructed on a 29 metre deep lot.	To be addressed by others.
57	Proposed Amendment: To reduce the minimum Lot Frontage for Semi-Detached from 15 metres to 14 metres. Reply: No objection to the proposed.	To be addressed by others.
58	Proposed Amendment: To reduce the Average Lot Depth from 30 metres to 29 metres.	To be addressed by others.

	Reply: No objection to the proposed 29 metres via site specific exemption. The regulation in the RBC2 zone is to remain 30 metres, with site specific exemptions to permit 29 metres for select blocks within the Plan of Subdivision. A corresponding exemption to Lot Area for Single Detached will be required, from 255 square metres to 246 square metres for an interior lot, and from 330 square metres to 319 square metres for a corner lot. Note, a minimum 30 metre lot depth is required along the northern limit of the Plan of Subdivision, as previously communicated by Planning staff.	
59	Proposed Amendment: To reduce the Front Yard Setback from 6 metres to 3 metres, provided the garage is setback a minimum 6 metres from the street line. Reply: This proposed amendment is not supported by Planning staff. The minimum 6 metre setback in the RBC2 zone is to remain, which is the City's standard in most low rise residential areas. Vehicles parked in driveways must not obstruct or interfere with the municipal sidewalks or multi-use trails. The zoning provision enabling a minimum 5 metre setback from the street line to the habitable portion can remain, where a minimum 7 metre setback to the garage is provided. This provision in intended to provide a minor degree of flexibility to accommodate home purchasers with larger vehicles (e.g., Ford F-350 Super Cab), using a give and take approach.The minimum 6 metre front yard setback is established for various reasons, including to: » accommodate landscaping and trees » accommodate snow storage, particularly from the driveway and abutting sidewalk » facilitate at-source infiltration » maintain streetscape character and a consistent street edge » maintain consistency with the residential lands to the east and elsewhere in the City of Waterloo » create separation from municipal infrastructure and utilities (including the 2.0 metre wide easement along the street line)	To be addressed by others.
60	Proposed Amendment: To reduce the Side Yard Setback from 1.2/1.2 metres to 1.2/0.6 metres.	To be addressed by others.

	Reply: This proposed amendment is not supported by Planning staff. The minimum 1.2/1.2 metre setback in the RBC2 zone is to remain. The minimum 1.2/1.2 metre side yard setback is established for various reasons, including to: » manage drainage and facilitate at-source infiltration » facilitate access to rear yards » facilitate maintenance of the house » accommodate utilities and mechanical equipment (e.g., air conditioners) in side yards » enable more windows (natural light), including window wells, on the side facades of the house » avoid the need for easements » reduce neighbour disputes » create reasonable separation between homes, including eaves » enable architectural projections, such as an exterior chimney breast » accommodate side door landings for garages	
61	Proposed Amendment: To reduce the minimum Rear Yard Setback from 7.5 metres to 6.5 metres. Reply: No objection to the proposed 6.5 metres via site specific exemption. The regulation in the RBC2 zone is to remain 7.5 metres, with site specific exemptions to permit 6.5 metres for select blocks within the Plan of Subdivision, specifically those with reduced lot depth (i.e., minimum 29 metres versus the required minimum 30 metres).	To be addressed by others.
62	Proposed Amendment: To increase the maximum width of a private garage attached to the main building from 58% to 60%. Reply: No objection to the proposed, which is minor in nature.	To be addressed by others.
63	Proposed Amendment: To increase permitted porch encroachment into the Front Yard and/or Flankage Yard from 0.6 metres to 1.5 metres. Reply: This proposed amendment is not supported by Planning staff.	To be addressed by others.

64	Proposed Amendment: To amend regulation 7.17.10 to read: “Where a LOT LINE abuts a RESERVE, the LOT LINE shall be considered a STREET LINE for the purposes of applying setbacks and building entrance regulations.” Reply: Planning staff request clarification regarding this proposed amendment, as there are no regulations in the RBC2 zone related to “building entrances” nor relevant regulations in Zoning By-law 2018-050 based on an initial review. Please elaborate on the intent of this amendment. Also, please clarify which block(s) in the Draft Plan of Subdivision that this proposed amendment applies to.	To be addressed by others.
Residential Beaver Creek Three (RBC3) Zone		
65	Proposed Amendment: To reduce the Side Yard Setback from 1.8 metres to 1.5 metres for Stacked Townhouse, Freehold Townhouse, and Triplex. Reply: No objection to the proposed.	To be addressed by others.
66	Proposed Amendment: To reduce the minimum Rear Yard Setback from 7.5 metres to 6.5 metres. Reply: No objection to the proposed 6.5 metres via site specific exemption. The regulation in the RBC3 zone is to remain 7.5 metres, with site specific exemptions to permit 6.5 metres for select blocks within the Plan of Subdivision with a Lot Depth of between 29 and 30 metres.	To be addressed by others.
67	Proposed Amendment: To increase the maximum Lot Coverage from 55% to 60%. Reply: No objection to the proposed, recognizing that some blocks in the proposed subdivision are anticipated to have a minimum Lot Depth of 29 metres.	To be addressed by others.
68	Proposed Amendment: To reduce the Front Yard Setback from 6 metres to 5 metres, provided the garage is setback a minimum 6 metres from the street line. Reply: This proposed amendment is not supported by Planning staff. See comments above (#4).	To be addressed by others.

69	Proposed Amendment: To increase permitted porch encroachment into the Front Yard and/or Flankage Yard from 0.6 metres to 1.5 metres. Reply: This proposed amendment is not supported by Planning staff.	To be addressed by others.
Residential Beaver Creek Four (RBC4) Zone		
70	Proposed Amendment: To reduce the Rear Yard Setback from 7.5 metres to 5 metres for Multiple Residential Buildings. Reply: No objection to the proposed, as it maintains a consistent minimum setback relative to the street line, provided that a minimum 7.5 metre setback is maintained adjacent to Block 109 (Open Space). Building placement can be refined through Site Plan Control.	To be addressed by others.
71	Proposed Amendment: To increase the permitted density from 150 bedrooms per hectare to 350 bedrooms per hectare. Reply: As set out in the City's Official Plan and the Beaver Creek Meadows District Plan, the maximum permitted density is 300 bedrooms per hectare. Planning staff would support an amendment to 300 bedrooms per hectare.	To be addressed by others.
72	In addition to the above, regulation may be applied to implement the Beaver Creek Meadows District Plan, including: a. Minimum building height of 9 metres. b. Minimum height of the first storey for buildings along Conservation Drive. Such regulations are typically in the minimum 4 metre range. c. Provisions for live-work units and various non-residential uses contemplated in Policy 3.4.14 of the District Plan, if determined to be appropriate. Please advise of any concerns with the above.	To be addressed by others.
73	Assurances will be required confirming that single car garages are functional. Stairs and other encroachments must not obstruct a standard vehicle (such as a Honda Accord or Honda CRV) from functional parking within the garage with reasonable degrees of buffer, nor prevent the resident from entering/exiting their vehicle while parked in the garage, nor accessing any stairs to/from the	To be addressed by others.

	residence. Garages should also be sized to accommodate refuse bins and similar storage.	
Engineering		
No.	Comment	Response
General Comments		
1	City Development Engineering is satisfied with the design for the purposes of the Draft Plan of Subdivision, provided that all items outlined in the "Prior to Draft Plan Acceptance" section are addressed. If road or block configurations are changed in any subsequent submissions, you must obtain written confirmation from the Senior Project Engineer in Engineering Services on whether a complete or partial resubmission will be required from Engineering.	Rushing River between Esker Lake and Roy Schmidt has been removed. This change has been circulated and discussed in several meetings.
2	These comments focus on ensuring that servicing and grading are feasible within the proposed blocks. They are not a comprehensive review; a more detailed design assessment will be conducted during the detailed design stage.	No response required.
3	The applicant must review **CELM Volume 2, Section 4.1.3 – Submission of Engineering Design** for a complete list of detailed design submission requirements. Incomplete submissions will not be reviewed. Submissions that are not coordinated across disciplines (e.g., inconsistent base drawings between engineering and landscape architecture plans) will also not be reviewed. **All engineering and landscape architecture drawings must be coordinated and submitted as one package.**	The resubmission has been coordinated.
4	The following comments must be addressed prior to Draft Plan Approval. The applicant is responsible for providing a written response to each engineering-related comment.	This document.
5	The **City of Waterloo's Development Engineering Manual** has been superseded by the **Comprehensive Engineering and Landscape Manual (CELM)**, which can be accessed at: https://www.waterloo.ca/en/government/development-engineeringmanual.aspx. The applicant must adhere to the most up-to-date version of the CELM unless otherwise directed by the City.	No response necessary.
6	During detailed design, ensure compliance with **CELM Volume 3, Section 4.6.p**, which requires the perimeter of subdivision developments to have **heavy-**	The ESC plans show OPSD 219.131.

	duty sediment control fencing per OPSD 219.131. The applicant must revise the Erosion and Sediment Control (ESC) Plan accordingly.	
7	Engineering services acknowledges that the trails shown in the **7th submission**, particularly in the northwest corner of the site, are not desirable as noted in other city comments. Revisions in this area will be required. Additionally, retaining walls should be minimized or eliminated where possible during detailed design.	Trails have been removed.
8	The applicant should review comments provided by all City departments prior to making changes to ensure a coordinated approach.	Complete.
<u>Prior to Draft Plan Acceptance</u>		
Grading and Drainage Requirements		
9	Per **CELM Table V5-1 – Lot Grading and Drainage Criteria**, the maximum allowable embankment slope is **4:1**. Additionally, grading between waterbodies and walkways should be minimized to enhance public safety.	Separation between the sidewalk along Pinery Trail and the top of slope (down into the SWM facility) has been increased. This, along with plantings and visual barriers provides an appropriate level of safety. Refer to Pinery Trail & SWM facility cross-section B-B figure.
10	To mitigate risks, grading shall not exceed **4:1** from the pond's spill elevation up to the property line. Furthermore, a **3.0m buffer** is required between any trail and the property line or top of an adjacent open space (**CELM Volume 7, Section 3.2.5.10**).	See response to item 9 above. The 3:1 slope on the SWM block is not a safety concern due to the separation, plantings, and visual barriers.
11	The current design, which includes a **3:1 slope** along the northern and eastern limits of **Block 33 (Stormwater Management)**, does not comply with these requirements.	See response to items 9 and 10 above.
12	Additional buffers, further reduced slopes, or other measures should be proposed by the applicant as needed to safeguard the public.	See response to items 9 and 10 above.
13	**Action**: Revise the design to meet the required **4:1 slope** and **3.0m buffer** or demonstrate a more comprehensive alternative solution that ensures pedestrian safety within the existing block size. If necessary, adjust the **pond block size and/or configuration** to maintain public safety.	See response to items 9 and 10 above.
Easement Sufficiency in Block 30 (Park)		

14	The applicant must provide written confirmation that the **easement within Block 30 (adjacent to Block 33 - Stormwater Management)** is sufficient to accommodate all potential construction disturbances, including future underground servicing replacement or repairs.	The sanitary sewer is ±4.8m deep at Pinery Trail, ±3.3m deep at the southwest corner of the park block, and ±5.8m deep at Rushing River Street. The proposed 8m-wide maintenance access (as discussed in a meeting on April 9, the City will likely not require an easement over its own land) is sufficient to ensure that the sewer can be maintained/replaced, with the use of trench boxes. The trail has intentionally been located on top of the sewer, so that it can be replaced rather than needing to remove trees.
15	**Action**: If additional width is required, adjust the servicing easement accordingly.	Additional width is not required.
Stormwater Management Facility – Maintenance Access		
16	Prior to draft plan acceptance, the applicant must confirm that the pond block can accommodate the following maintenance access requirements:	
17	Maintenance access roads shall be **at or above the high-water level** to provide access to inlet and outlet structures.	The maintenance access road is above the 100-year design storm ponding elevation.
18	A **minimum 3.0m wide surface** must be provided to accommodate maintenance vehicles, with a **minimum 10m turning radius (inside radius)** and a **flat 10m loading area**.	The listed requirements have been used to design the access road.
19	Ramps from the maintenance access road must extend to the facility bottom elevation for access to the forebay and main cell. Maintenance access routes shall not exceed a **maximum slope of 10:1**.	Ramp to the bottom: not required as per Darren Scott in email on Aug 13, 2024. Access route does not exceed 10%.
20	Maintenance access routes that double as trail connections shall be **paved**; otherwise, they must be constructed using an **Articulated Concrete Block System (e.g., Cable Concrete G2).**	The proposed access road through the SWM Pond block doubles as a trail connection and will therefore be paved. The access road down a slope toward the berm between forebay and wet pond will be a concrete block system (as will the weir between the forebay and pond itself).

21	**Action:** Provide revised grading plan of the pond block with the above design elements or written confirmation that the above design elements are feasible for implementation during detailed design	The revised Figure 9 shows the design elements requested and meets the provided requirements.
Coordination of Submission Changes		
22	Comments from other City departments may result in modifications to the engineering submission, including but not limited to: ・Revisions to baseline figures and drawings ・Area takeoffs and calculations ・Servicing plans ・Grading plans	All comments have been reviewed.
23	**Action**: Prior to Draft Plan Acceptance, incorporate all necessary changes and submit a **change log** to City Engineering Services, clearly outlining the modifications made.	An Excel file has been prepared and forms part of the resubmission package.
Landscape		
No.	Comment	Response
1	Please ensure that comments are addressed and provide a comment response specific to landscape items. A fully coordinated submission with written response to all comments will help expedite review. Staff note that the response matrix provided (dated October 31, 2024) is based on the March 3, 2023 comments, not the March 2024 circulation comments. Where applicable, March 2024 comments have been refined to reflect a review of the current plans.	To be addressed by others.
2	Please note that the previous landscape manual has been consolidated with the previous Development Engineering Manual to form the Comprehensive Engineering and Landscape Manual (CELM). All forthcoming landscape submissions, including the park design, shall be required to adhere to the current version of the CELM at the time of development. CELM can be found on the City's website: Engineering and landscape manual - City of Waterloo	To be addressed by others.
<u>Block 30 – Park</u>		
3	Per previous comment, provide a current/revised Landscape Sketch for Park Block30. The revised plan shall include accurate and coordinated information, such as the proposed sanitary sewer and associated easement and coordinated trail width and alignments. **Prior to Draft Plan Approval,**	To be addressed by others.

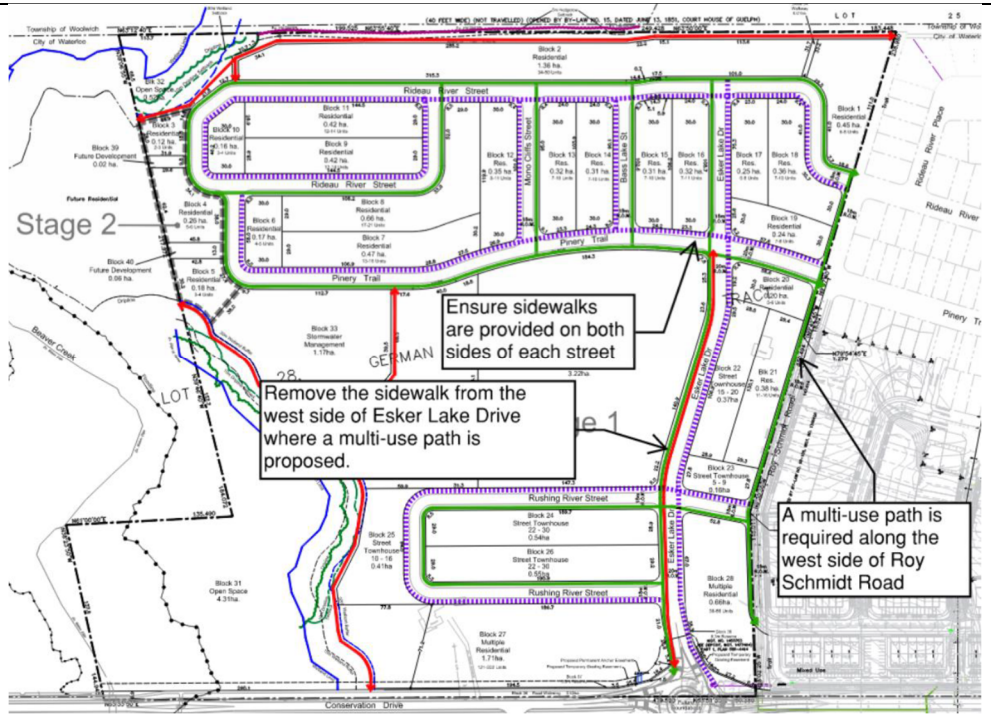
3.a	Revise the plan to clearly show the limits of the proposed sanitary easement and remove the label for PROPOSED ALTERNATIVE SANITARY SEWER CONNECTION.	To be addressed by others.
3.b	Confirm the exact areas of all servicing easement encumbrances within the Park Block.	To be addressed by others.
3.c	Confirm the width of the pathway over the sanitary easement. It is currently labelled as 4.0m WIDE STORMWATER POND ACCESS but measures at 3.0m.	To be addressed by others.
3.d	Remove the reference to the soccer pitch extending from neighbouring school property.	To be addressed by others.
3.e	All pipes and other encumbrances should be strategically planned to permit shade trees along the trails and throughout the park. Please confirm that trees will be planted on the south and west sides of the trails, considering the proposed location of the sanitary easement. Currently, the alignment of the service within the easement (close to the east edge) would result in encroachment beyond the easement for any future maintenance and would also impact tree planting adjacent to the pathway. Please demonstrate this on the revised Landscape Sketch. Trees shall be planted as part of park construction within Stage 1. Provide the sanitary depth and accurate easement limits for the Park Block.	To be addressed by others.
4	Further to the above, it appears that many other comments dated June 29, 2023 by Daniella Giovanatto were not reflected in the revised park concept plan despite the comment response noting the Preliminary Park Plan has been revised in accordance with comments provided by the City on June 29, 2023. Staff note that as per the Comprehensive Engineering and Landscape Manual (CELM), a City-approved Park Concept Plan shall be in place prior to the formal public meeting and registration of the subdivision. This will be a standard condition of Draft Plan Approval.	To be addressed by others.
4.a	Examples of items that will need to be refined include the school block trail location, buffer between rink and Pinery Trail, the location of water and hydro services aligning with future rink, buffer and space for tree planting between senior play equipment and basketball court, shifting pathway to maximize the passive open space in the middle of the park, and more.	To be addressed by others.

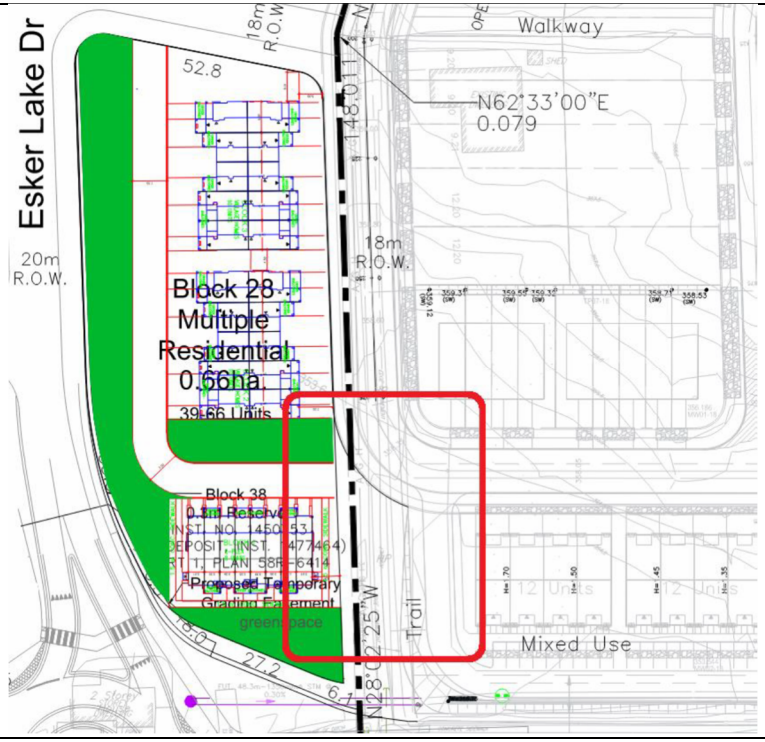
4.b	Once the refined Park Concept Plan is complete, please send to the Development Engineering Landscape Architect to discuss the overall design including conceptual layout, required landscape features, and more. A meeting to review this can be set up as required. Refer to the CELM for further information on this standard process.	To be addressed by others.
5	Where previous comments relating to future Park Concept refinement are not critical to Draft Approval, they have been removed from this comment document. Some details worth noting at this point include.	To be addressed by others.
5.a	City standard 1.5 meter height black vinyl chain-link fencing shall be provided at all public-private interfaces where private lands abut wetlands, buffer lands, environmental lands, woodlots and open spaces meant to be naturalized, and park interfaces to minimize encroachments. All fencing will need to be coordinated with the Blanding's Turtle Mitigation Plan. Staff note the Fence Layout Plan provided as part of the Preliminary Servicing Report and acknowledge that the Comprehensive Fencing Plan will be required in accordance with Draft Plan Conditions.	To be addressed by others.
<u>Block 33 – Stormwater Management</u>		
6	Sufficient deterrents need to be designed into the shared property line between Block 30 (Park) and Block 33 (SWM) to maintain safety given the slopes of the pond and the proximity to the pond. Given the pond's grading and the proposed sanitary sewer easement, demonstrate where planting and other deterrents will be located. We understand that slopes will be generally naturalized and that a swale has been added on either side of pathway. The swale location shall be coordinated to maximize tree planting along the trail without disrupting function of the swales. **This can be coordinated through detailed design.**	To be addressed by others.
7	Address the previous comments dated June 29, 2023, as outlined below. **These can be addressed through detailed design.**	To be addressed by others.
7.a	Show the permanent pool / normal flood elevation in relation to lower tree plantings	To be addressed by others.
7.b	Continue to show trail alignment as well as associated detailed grading	To be addressed by others.
7.c	Include a schedule of tree quantities broken down by large and small canopy forms and planned planting size and condition (i.e., caliper/wire basket, etc.)	To be addressed by others.

7.d	Maximize tree planting to demonstrate that required compensation targets can be met.	To be addressed by others.
7.e	Clearly identify the existing dripline and associated 10m setback	To be addressed by others.
8	Staff appreciate that the pond design and elevations have been adjusted so that the low point of the access pathway is closer to the 100 year storm level; however, there are items related to sloping and setbacks that are not compliant with City standards. As a reminder, a minimum 1.0 m wide mow strip is required along all public pathways. Further, a 3.0m buffer is required between any trail and the property line or top of an adjacent open space (CELM Volume 7, Section 3.2.5.10). The mow strips shall be 4% slope maximum grade for maintenance and safety. City standard maximum sloping for open space areas is 4:1. Considering the adjacency of the pathways and sidewalks to the pond slopes, the 4:1 max. sloping is particularly important in this context. The Applicant must demonstrate that these constraints have been addressed prior to Draft Plan Approval.	Meritech has discussed the 4:1 slopes with the City (March 25) and circulated preliminary sketches for comment (March 28). Further to that, Michael Stewart confirmed (April 3) that the proposed modifications to the Pinery Trail right of way (shifting sidewalk; adding a mow strip, planting buffer, and visual markers) are supported, and that through detailed design the possibility of flattening 3:1 slopes is further reviewed. We believe that the increased separation between the sidewalk and the top of slope, along with the proposed plantings and visual barriers, provides an appropriate level of safety.
9	Please refer to Engineering comments provided by Michael Stewart for further SWM pond comments/information.	No response required in this location; refer to responses to Engineering comments.
10	Per previous comments, given the proposed tree removals and required 2:1 compensation rate, ensure there is adequate space for tree planting within SWM Block. This reiterates previous comments regarding removal of trees around the hedgerow and woodland ‘knob’. For clarity, required compensation numbers as per the EIS are outlined below. Confirm there is adequate space for minimum of 108 trees to be planted within the Park Block, SWM Block, and Open Space Blocks. Compensation planting shall be primarily large canopy species. **Prior to Draft Plan Approval, confirm that adequate space will be provided for tree planting.** a. 39 trees removed from the hedgerow b. 15 trees removed from the woodland knob c. Total of 54 trees removed, at 2:1 compensation rate equals 108 trees to be planted	To be addressed by others.

Block 35 – Trail		
11	Provide a clear plan that demonstrates the trail, 1.0 m wide mow strips, grading, proposed infiltration galleries, planting, and buffer to residential property will all fit within the proposed trail block. Please include slope labels as required confirming the trail will meet AODA requirements. If possible, trails should be designed within ideal range of 2-4%. Per previous comment, the 2.5m trail (Avon Trail) width is acceptable in the trail block, however Engineering Services staff need to confirm that the proposed grading is acceptable and the slopes are stable, provide sufficient growing area and are able to be planted and maintained. As previously noted, the Trail Planting Concept Plan (dated May 9, 2019) prepared by GSP does not show Block 3 (Walkway). Please refer to Engineering comments provided by Michael Stewart for further trail block comment/information.	Trail concept has been updated. AODA (max. 5% trail slopes) is not able to be met; refer to response to another comment.
Block 31 – Open Space		
12	The 3m buffer between the proposed 3m asphalt trail and the residential block is defined by the 1m mow strip and the drainage swale. Staff have concerns regarding establishment of plant material between the trail and the future residential rear yards to create a meaningful buffer. Per previous comment, grassed swale between trail and property line does not meet City standard requirements of 3.0m buffer between trail and property limits. Staff need to be confident that the trail, mow strips, any required grading (including swales/CBs as needed), buffers and tree planting can be accommodated within the space provided. Since the required compensation tree planting may occur within the Open Space blocks, the swale, any required culverts and fencing will restrict planting opportunities. Where feasible, trails should be designed to meet AODA requirements within an ideal range of 2-4%. **Further coordination and detail will be required through the Buffer Landscape Plan, Comprehensive Fencing Plan, and Engineering plans as Conditions of Draft Plan Approval.**	We acknowledge that details of plantings can be finalized through detailed design, following Draft Plan Approval. To provide additional land for City trees, some of the slope on the east side of the trail has been added to the open space block.
Block 32 – Open Space		
13	Formerly a trail was proposed encroaching the wetland setback. This alignment was adjusted based on feedback and is shown outside of the wetland buffer on the current Active Transportation Plan; however, a trail, infiltration galleries and	To be addressed by others.

	a retaining wall are shown on the current civil plans, well within the buffer. Please ensure that all plans are coordinated and show the current proposal for trail alignment. Refer to Environmental Planning comments regarding the trail alignment in this block and potential EIS implications, pending the proposed block configuration.		
<u>Front Yard Setbacks</u>			
14	Landscape staff note that Front Yard setbacks are still proposed to be reduced for the single detached and townhouse lots. Whereas the reduction was down to 3m as part of the last submission, the current proposed reduction is from 6m down to 5m. While the amount of proposed reduction is an improvement from the previous design, the priority for this setback from a landscape perspective is the accommodation of tree planting. The applicant's consultant shall demonstrate that the 5m setback will support the planting of canopy trees including sufficient soil volumes. Tree planting shall also be prioritized throughout the detailed design stage through coordination with servicing and utility layouts to ensure maximum tree planting through the subdivision. **This shall be a condition of Draft Plan Approval.**	To be addressed by others.	
15	The previous comment read "If the Developer would like the City to plant the street trees, documentation must be provided which indicates that the City Forester has approved this request." This is no longer an option. Please provide a street tree planting plan for city approval at the detailed design stage. **This will be a Condition of Draft Plan Approval.**	To be addressed by others.	
Transportation and Active Transportation			
No.	Comment	Responsible	Response
1	Please confirm that sidewalks will be provided on both sides of each street in the subdivision. Except for Esker Lake Drive and Roy Schmidt Road where a multi-use path will be constructed on one side of the street and a sidewalk on the other. The Active Transportation plan only shows sidewalks (green lines) on only one (1) side of each street. Additional side walks are required, as shown by the purple lines on the image below:	To be addressed by others.	

		
2	A mutli-use path is required along the west side of Roy Schmidt Drive, in place of the proposed sidewalk.	City staff subsequently confirmed via email that sidewalks are acceptable along Roy Schmidt Road – a MUT is not required other than north of Rideau River.
3	Staff have reviewed the concept plans for Block 27 and 28. Please note that driveway access will not be permitted within the curve of a road. As such, these concepts should be revised. a. Block 27: The proposed west access must not be within the curve of Rushing River Street. b. Block 28: The proposed access must not be within the curve of Roy Schmidt Road or the trail (as shown below).	To be addressed by others.

		
4	Drawing “Conservation Dr. Roundabout” (page 42, Preliminary Servicing Report) includes a cross-section drawing from Conservation Drive to Rushing River Street. Please note that this cross-section should continue up to Pinery Trail (20m).	Please refer to the second cross-section (Esker Lake from Rushing River to Pinery) - the underground services are in different locations on the two cross-sections.
5	Drawing “Proposed Street Sections -2 556 & 576 Conservation Drive” shows a vehicle lane width of 3.7m. The lane widths shall be 3.5m wide with the additional 0.4m reallocated to the boulevard.	Lane widths on all streets have been reduced to 3.5m. This will be shown on the engineering drawings submitted for approval following DPA.
6	The south section of Roy Schmidt Road is to be upgraded to a municipal standard and opened as a public highway (currently a temporary emergency access). The cost of this works is to be shared fully between 30T-17403 (Activa) and 30T-16402 (Cook/Mattamy) for the cost of upgrading the south portion of Roy Schmidt Drive to a municipal right-of-way.	Acknowledged; coordination with Activa/Stantec will continue on design and construction matters.

Archeology		
No.	Comment	Response
1	I have received two (2) letters from the Ministry of Tourism, Culture and Sport and the Ministry of Citizenship and Multiculturalism confirming that archeological assessment reports for Findspot 3 and Findspot 4 have been entered into the Ontario Public Register. As a result, no further archaeological assessments are recommended at the study areas.	To be addressed by others.
Grand River Conservation Authority		
No.	Comment	Response
<u>GRCA Draft Plan Comments</u>		
1	Our previous concerns have now been addressed at this stage in the subdivision process. As a result, we are now in a position to recommend draft plan approval with the following conditions: Prior to any grading or construction on the site and prior to registration of the plan, the owners or their agents submit the following plans and reports to the satisfaction of the Grand River Conservation Authority.	To be addressed by others.
1.a	A detailed stormwater management report in accordance with the 2003 Ministry of the Environment Report entitled "Stormwater Management Planning and Design Manual".	A “Final” SWM report will be submitted in support of permit and clearance. The report will address all GRCA comments received.
1.b	A detailed Lot Grading, Servicing and Storm Drainage Plan.	Grading drawings have already been submitted in February in support of a Schedule “A” permit application. GRCA comments received on that submission do not require any modifications to the grading drawings. Servicing drawings will be submitted.
1.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.	E&S control drawings have already been submitted in February in support of a Schedule “A” permit application. GRCA comments received on that submission do not require any modifications to these drawings.

1.d	The submission and approval of a permit under the Prohibited Activities, Exemptions and Permits Regulation from the GRCA prior to construction and/or grading in a regulated area and/or construction of the Stormwater Management outlet in a regulated area.	A Schedule "A" permit application was submitted in February; a second submission is forthcoming to address GRCA comments.
Detailed Design Comments		
2	As part of detailed design and prior to draft plan clearance, the GRCA requests that the applicant provides the following:	
2.a	Orifice sizing and conveyance capacity calculations for the stormwater management (SWM).	A Final SWM report will be submitted in support of permit and clearance. Orifice calculations (an integral part of the MIDUSS modeling) will be described in the report.
2.b	Demonstration of safe conveyance of the regulatory storm (e.g. through rights-of-way, at pond inlet/outlet, and conveyance swale to wetland).	A Final SWM report will be submitted in support of permit and clearance. A fuller description of the safe conveyance of the Hazel event will be provided.
2.c	Additional detail in the water balance analysis to demonstrate that the hydrologic conditions within the northwest "wetland finger" and the southwest swamp unit will not be adversely impacted; current calculations appear to treat the wetlands as a single unit.	Infiltration within the trail block along the north boundary line will ensure that infiltration volumes to the northwest "wetland finger" are maintained; the overall approach of a distributed CWC (third-pipe) system will assist in ensuring that infiltration is distributed and annual contributions to both Beaver Creek and the southwest swamp unit are maintained. This will be further described in the Final SWM report, and calculations provided for each of the three receivers (NW wetland finger / creek / SW swamp).
2.d	Detailed landscaping plans for the wetland buffer areas and SWM pond adjacent to Beaver Creek.	Landscaping plans will be submitted in the detailed design phase. As discussed with GRCA staff, these may be to clear a condition of approval.
Advisory Comment		
3	The boundary of the wetland located toward the northwest portion of the site was last verified in September 2015. The GRCA will request re-delineation when development plans on the adjacent property proceeds.	We acknowledge that if/when the adjacent "Brohman" lands are designed (by others), re-delineation will be required.
4	We wish to acknowledge receipt of the remaining fees for this subdivision ($7,500). Additional fees will be required for draft plan clearance, and a separate fee will be required for a GRCA permit.	Please confirm the fee for DP clearance. GRCA permit fee is believed to have already been provided.

Region of Waterloo			
No.	Comment	Responsible	Response
1	Regional staff has reviewed the above-noted re-circulation and provide the following comments for your consideration at this time. Staff comments were first issued June 12, 2018 with re-submissions of the plan by the applicant in 2020 (plan dated June 25, 2020) and 2022 (plan dated December 15, 2021). The December 15, 2022 plan is proposing between 423 - 609 units comprising single detached, street-townhouses, and two multiple residential blocks.	To be addressed by others.	
<u>Density</u>			
2	Staff is currently reviewing the density for this development relative to the up-to-date PPUs assumed in the recently approved Region Official Plan amendment No. 6.	To be addressed by others.	
<u>Environmental Planning</u>			
3	Environmental Planning staff has reviewed the revised report, “2115881 Ontario Limited, North Waterloo Environmental Impact Statement” (NRSI, September 2022). Without having to repeat comments provided by others, staff supports the comments provided through the City of Waterloo response (March 10, 2023) under the heading “Environment”, and the GRCA response (November 18, 2022), and does not have additional separate comments at this time. Please provide the Region with a copy of the responses to the concerns identified, as well as copies of the associated updated materials, specifically the revised Environmental Impact Statement.	To be addressed by others.	
<u>Water Services</u>			
	Water Services Engineering and Planning staff has reviewed the Preliminary Servicing Report dated September 2022 prepared by Meritech and provide the following comments:	The Preliminary Servicing Report was reissued in October 2024. A number of minor comments have already been addressed.	
4	The report references Region of Waterloo model results from July 2021. Since that time, the Region has provided update model results from October 2022. The Preliminary Servicing Report should be updated to reflect the current model results.	The Preliminary Servicing Report issued in October 2024 was updated to include reference to the October 2022 model results. No further changes are required at this time. Table 4 of the October 2024 report shows that AFF increases with full implementation of the Region’s planned work.	

5	It is acknowledged that the proposed water servicing strategy alone does not meet the fire demand requirements for the proposed development. Specifically, Location E (Townhouse Block) has a fire demand of 133 L/s, and the results indicate that 111 L/s is the maximum available fire flow. It is acknowledged in the report that building specific requirements (fire wall, alternative construction materials) may be required but it is not clear for where that may be required. The consultant must provide a plan that clearly shows where there is deficient fire protection available and outlined what must be done to achieve the required fire flow. It may be possible that certain blocks/phases of the subdivision may not be able to proceed until the ultimate water servicing strategy is completed (external watermains on Conservation Dr, Beaver Creek Rd and Erbsville Rd as outlined in the Waterloo North Pressure Zone Consolidation Report).	The Final Servicing Report (and/or supplemental addendums) that will be submitted for clearance of Draft Plan Conditions will include a more detailed description of any building-specific requirements that may be required, as this is dependent on both timing (i.e. when the subdivision is constructed vs. external works being completed) and phasing (i.e. how large each phase of development is).
6	Furthermore, the fire protection for the school block is similar, and there may be holding provisions for the blocks/phases related to the school block.	Acknowledged.
7	It is recommended that the consultant submit detailed water distribution reports with each phase of development in order to ensure that the proposed phase can be supported by the existing infrastructure constructed at the time of submission. Alternatively, there may be some restrictions to certain types of higher fire flow demand developments until the ultimate water servicing strategy is complete.	Agreed. A Final Servicing Report (and/or supplemental addendums) will be prepared in support of each phase of development/construction.
<u>Hydrogeology and Water Programs</u>		
8	Water Services HWP staff previously requested that a chloride impact assessment be completed (comments June 12, 2018). To our knowledge this has not been completed. Staff await this assessment, before completing its review of this latest 2022 recirculation. In the meantime HWP staff provided comments to Planning staff related to its review of the updated Preliminary Stormwater Management Report (Meritech, 2020). These were inadvertently missed and never passed along to you. These comments are now provided below,	The Preliminary Stormwater Management Report that was reissued in October 2024 includes a section entitled ”Salt Impact Assessment”. The Final SWM report that will be submitted to clear conditions will refine this work and demonstrate that the slight exceedance of sodium currently noted is able to be eliminated by adding some additional catch basins, as described on page 20 of the 2024 report.
9	Clarification of the proposed strategy for the rear yard roof drains in catchments 504 and 505. Will they connect directly to the rear-yard infiltration galleries? A	Figure 4 will be updated (elimination of the “disconnection”) to match the description in the body of the report.

	Figure [no number] appears to show that rear yard roof drains will discharge to grade, rather than directly to the rear-yard infiltration gallery. The figure also notes that rear roof drains will be “disconnected”. And in catchment 503 & 701 the entire roof will be connected to the CWC.	
10	That the proposed Stage II Monitoring Program groundwater chemistry include sodium and chloride.	The Stage II monitoring program will include sodium and chloride. A TOR is currently being prepared and will be circulated for approval prior to finalization (and approval) of the program report.
11	A significant volume of infiltration is proposed from runoff originating from paved surfaces (via EOP infiltration gallery). As previously requested, HWP asks that a Chloride Impact Assessment to be completed prior to DPA, which may be included as a new section within an updated Preliminary SWM Plan, to the satisfaction of the Region. Alternatively this could be provided as a separate report or memo.	The Preliminary Stormwater Management Report that was reissued in October 2024 includes a section entitled ”Salt Impact Assessment”.
12	A Salt Management Plan (SMP) will be required for the proposed school block at Site Plan Control. In the event that future revised Draft Plan of Subdivision applications include multi-residential, commercial, institutional, industrial, or community uses properties with private parking lots and/or private roads, a SMP will be required for those properties at Site Plan Control.	This will be added to the Final SWM report as a recommendation.
13	Proposed conveyance and EOP infiltration galleries will need to be designed to have a separation between the bottom of the infiltration gallery and the maximum groundwater elevation observed at each respective location. The high water table across the site may influence where lot-level and 3rd pipe conveyance systems are feasible. This will need to be verified prior to approval of the Final SWM Report, to the satisfaction of the Region, City and GRCA.	Detailed design drawings will show the seasonally high groundwater elevations to demonstrate sufficient separation to proposed infiltration measures.
14	As now noted in the SWMR, building sump pumps should be connected to the 3rd pipe CWC system.	Acknowledged.
15	Any proposed lot-level infiltration galleries and / or 3rd pipe collector systems should be oversized by 15% to account for decreased performance over time and/or private homeowner disconnection	This will be added to the Final SWM report as a recommendation.
16	Finally staff notes that the CWA mapping has been updated since the submission in 2018 and that an S59 notice is no longer required.	To be addressed by others.

Noise Study		
17	Staff has reviewed the report entitled, “Preliminary Environmental Noise Impact Assessment” (Meritech, Revised August 2022), and concur with the report conclusions and recommendations. The report notes the 2035 traffic forecast assumed in the assessment (for Conservation Drive) is taken from the 2015 environmental assessment completed for Beaver Creek Road and Conservation Drive, and which is beyond the 10-year forecast required by the Region’s noise guideline. As a result, the assessment would represent a conservative prediction of future noise levels at the points of assessment assumed in the report.	No response required.
18	The recommendations include provision for central air conditioning and noise warning clauses for all residential dwellings within 40m of the centre-line of Conservation Drive. At 40m from the cente-line of Conservation Drive, predicted noise levels are 55 dBA (outdoor living area), 45 dBA (indoor daytime) and 39 dBA (indoor nighttime), all meeting noise level criteria under the Region’s noise guideline and the MECP NPC-300 noise guideline.	No response required.
19	Based on the latest draft plan (December 15, 2021) no noise mitigation is required for any of the street towns shown on the plan. A detailed noise study will be required for multiple residential Blocks 105 and 106 prior to site plan approval.	No response required. Due to the slight modifications to the Draft Plan, the detailed noise study will now also cover some of the townhouses nearest the roundabout.
Agency Re-circulation		
20	2020 Re-circulation A re-circulation of the plan was completed for the 2020 resubmission. Comments were received from Bell Canada dated December 7, 2020 which noted that easements will be required at applicant’s cost. In addition, any relocation of existing Bell facilities or easements will also be at Developer’s cost. Comments attached. Comments were also received from the Grand River Conservation Authority dated July 8, 2021. Comments attached. No other agency comments were received from the 2020 re-circulation.	
21	2022 Re-circulation A re-circulation of the 2022 resubmission was not undertaken by Regional staff. However, staff acknowledges the comments provided by the Grand River	

	Conservation Authority (November 18, 2022) and the Waterloo Region District School Board (February 6, 2023) through the City's re-circulation of the latest plan. These comments are also attached for ease of reference.	
Waterloo Region District School Board		
No.	Comment	Response
Student Accommodation		
1	Currently, the subject lands are designated as a "Development Area" and are assigned to temporary Holding Schools. As such, the property is currently within the boundaries of the following WRDSB schools: Northlake Woods PS (Junior Kindergarten to Grade 8) - approximately 2.5 km away; and Waterloo CI (Grade 9 to Grade 12) - approximately 5.2 km away.	To be addressed by others.
2	The WRDSB's 2020-2030 Long-Term Accommodation Plan provides information on student enrolment and accommodation at these schools. Portable classrooms may be located on-site to provide additional capacity on an interim basis. Further, following approvals for capital funding and site acquisition from the Ministry of Education, a boundary study will be conducted to determine appropriate attendance area boundaries before the opening of a new school.	To be addressed by others.
Student Transportation		
3	The WRDSB supports active transportation and asks that pedestrians be considered in the review of all development applications to enhance safety and connectivity. The WRDSB acknowledges that a multi-use trail (separated from the road) is designed to run along the Esker Lake Drive frontage of the school block (Block 29) and that it will be the responsibility of the WRDSB to provide winter maintenance of this trail.	To be addressed by others.
4	Student Transportation Services of Waterloo Region (STSWR)'s school buses will not travel privately owned or maintained rights-of-way to pick-up/drop-off students. Transported students will be required to meet the bus at a congregated bus pick-up point. STSWR may have additional comments about student pick-up point(s) placement on municipal rights-of-way.	To be addressed by others.

WRDSB Elementary School Site Needs		
5	On May 10, 2021, WRDSB adopted a new Education Development Charges (EDC) By-law, 2021, amended in 2022. The rates in the By-law were calculated based on the 2021 EDC Background Study completed by Watson & Associates Economists Ltd. This Background Study contains updated growth and enrolment projections across the Region of Waterloo and identifies future school facility needs for student accommodation. Within this area of the City of Waterloo (Review Area PEW1) and directly resulting from residential growth, a pupil place deficiency is projected to substantiate over the 15-year planning horizon. Furthermore, the limited availability of alternative school site locations within the area has resulted in the WRDSB identifying the need for an elementary school block located within this application.	To be addressed by others.
WRDSB Draft Conditions		
6	That the Owner must agree in the Subdivision Agreement and/or Site Plan Agreement to notify all purchasers of residential units and/or renters of same, by inserting the following clauses in all offers of Purchase and Sale/Lease:	To be addressed by others.
6.a	“Despite the best efforts of the Waterloo Region District School Board (WRDSB), accommodation in nearby facilities may not be available for all anticipated students. You are hereby notified that students may be accommodated in temporary facilities and/or bussed to a school outside the area, and further, that students may, in future, be transferred to another school.”	To be addressed by others.
6.b	“For information on which schools are currently serving this area, contact the WRDSB Planning Department at 519-570-0003 ext. 4419, or email planning@wrdsb.ca. Information provided by any other source cannot be guaranteed to reflect current school assignment information.”	To be addressed by others.
6.c	“To limit liability, public school buses operated by the Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up students, and potential busing students will be required to meet the bus at a congregated bus pick-up point."	To be addressed by others.

7	That, in cases where Agreements of Purchase and Sale have already been executed, the Owner sends a letter to all purchasers, including the above statements;	To be addressed by others.
8	That the Owner supplies, erects and maintains a sign (at the Owner/Developer ’ s expense and according to the WRDSB's specifications), near or affixed to the development sign, advising prospective residents about schools in the area and that prior to final approval, the Owner shall submit a photo of the sign for review and approval of the WRDSB;	To be addressed by others.
9	That an elementary school site (the “School Site”) be set aside and designated in the Plan, (Block 29), being comprised of approximately 3.22 hectares (7.96 acres);	To be addressed by others.
10	That the School Site be appropriately zoned (EI - Educational Institution) in accordance with the City of Waterloo Zoning By-law No. 2018-050, as amended, or any successor thereof;	To be addressed by others.
11	That the School Site shall be developed and registered within Stage 1 and concurrent with the registration of ‘Rushing River Street’, ‘Esker Lake Drive ’ and Block 31 (Park) adjacent to the School Site;	To be addressed by others.
12	That prior to final approval of the phase that includes the School Site, or of any phase of the Plan that is registrable at the same time as or later than the phase including the School Site, the Owner and the City of Waterloo shall be advised by the Waterloo Region District School Board that satisfactory arrangements regarding the adequate provision and distribution of educational facilities have been made between the owner and the WRDSB for the phase for which approval is sought;	To be addressed by others.
13	That the Owner agrees to submit to the satisfaction of the Waterloo Region District School Board appropriate soil and environmental investigations, site grading plans, stormwater management plans, site servicing plans (sanitary, water and utilities) and archaeological investigations and pipeline details (if necessary). In the event of an identified concern, the WRDSB may commission its own studies at the cost of the Owner. Prior to registration of the Plan, the Owner shall certify that all properties to be conveyed to the Waterloo Region District School Board are free of contamination;	To be addressed by others.

14	That prior to final approval, the Owner shall submit to the Waterloo Region District School Board for review a copy of the final engineering plans as approved by the City of Waterloo, which indicates the storm drainage system that will service the School Site and the overall grading plans for the complete subdivision area;	To be addressed by others.
15	That the Owner agrees to rough grade the School Site to the satisfaction of the Waterloo Region District School Board, to ensure that it meets the grades of adjacent lots/ blocks;	To be addressed by others.
16	That the Owner obtains written permission from the Waterloo Region District School Board prior to placing any fill on the School Site;	To be addressed by others.
17	That if, prior to final approval, the Waterloo Region District School Board has elected to waive its interest in the School Site, the Waterloo Catholic District School Board, Conseil Scolaire Viamonde, and/or Conseil Scolaire Catholique MonAvenir shall also have the opportunity to acquire the School Site, subject to the same terms and conditions of approval, unless it has given notification in writing that its interest in the School Site has similarly been waived;	To be addressed by others.
18	That the City of Waterloo and prospective purchasers of property within the Plan be advised that, notwithstanding the designation of a School Site, there can be no assurance as to the timing of new school construction nor a guarantee that elementary school accommodation will be provided within the subject Plan;	To be addressed by others.
19	That all proposed pedestrian facilities be secured by letters of credit or other municipal agreements to ensure that installation occurs prior to demand (i.e., hard-surfaced municipally maintained pedestrian walks);	To be addressed by others.
20	That prior to final approval, STSWR be contacted to provide any relevant comments on transportation requirements, including school vehicle routes and infrastructure needs (including pedestrian facilities), and requests for student travel plans to area schools;	To be addressed by others.
21	That the Owner shall agree to provide the WRDSB with a digital file of the plan of subdivision in either ArcGIS Shapefile, ArcGIS File Geodatabase, or AutoCAD Drawing format containing parcel fabric and street network;	To be addressed by others.
22	Prior to final approval, the WRDSB advises in writing to the Approval Authority how the above conditions have been satisfied.	To be addressed by others.

Education Development Charges		
23	Please be advised that any development on the subject lands is subject to the provisions of the WRDSB's Education Development Charges By-law, Amended in 2022 or any successor thereof and may require the payment of Education Development Charges for these developments before building permit issuance.	To be addressed by others.
Bell Canada		
No.	Comment	Response
1	We have reviewed the circulation regarding the above noted application. The following paragraphs are to be included as a condition of approval: “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.	To be addressed by others.
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.”	To be addressed by others.
3	The Owner is advised to contact Bell Canada at planninganddevelopment@bell.ca during the detailed utility design stage to confirm the provision of communication/telecommunication infrastructure needed to service the development.	To be addressed by others.
4	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.	To be addressed by others.
5	If the Owner elects not to pay for the above noted connection, Bell Canada may decide not to provide service to this development.	To be addressed by others.